



# **Golden Gate National Recreation Area**

## **Dog Management Plan/EIS**

### ***Public Scoping Comment Analysis Report***

August 2006



# TABLE OF CONTENTS

INTRODUCTION AND GUIDE.....	1
<i>INTRODUCTION</i> .....	1
<i>THE COMMENT ANALYSIS PROCESS</i> .....	1
<i>DEFINITION OF TERMS</i> .....	2
<i>GUIDE TO THIS DOCUMENT</i> .....	2
CONTENT ANALYSIS REPORT .....	4
PUBLIC SCOPING COMMENT SUMMARY .....	7
<i>AG1000 - AGENCY RULEMAKING: NEED FOR EMERGENCY ACTION</i> .....	7
<i>AL1000 - ALTERNATIVES: ELEMENTS COMMON TO ALL ALTERNATIVES</i> .....	8
<i>AL4000 - ALTERNATIVES: NEW ALTERNATIVES OR ELEMENTS</i> .....	9
<i>AL5000 - ALTERNATIVES: 1979 PET POLICY</i> .....	23
<i>AW1000 - ANIMAL WELFARE: IMPACT ON/TO DOGS</i> .....	25
<i>CC2000 - CONSULTATION AND COORDINATION: REG-NEG PROCESS</i> .....	28
<i>GA1000 - IMPACT ANALYSIS: IMPACT ANALYSES</i> .....	30
<i>GA3000 - IMPACT ANALYSIS: GENERAL METHODOLOGY FOR ESTABLISHING IMPACTS/EFFECTS</i> .....	34
<i>LP1000 - LAWS AND POLICIES: IMPACT OF GGNRA ACTIONS ON OTHER NPS UNITS' ENFORCEMENT OF SERVICEWIDE POLICIES AND REGULATIONS</i> .....	35
<i>LU1000 - LAND USE: POLICIES AND HISTORICAL USE</i> .....	36
<i>LU2000 - OTHER AGENCIES POLICIES AND MANDATES REGARDING DOG MANAGEMENT</i> .....	37
<i>LU3000 - LAND USE: DOG PARKS PROVIDED BY SAN FRANCISCO AND OTHER MUNICIPALITIES</i> .....	38
<i>LU4000 - LAND USE: SAN FRANCISCO SIGNIFICANT NATURAL RESOURCES AREA MANAGEMENT PLAN</i> .....	39
<i>ON1000 - OTHER NEPA ISSUES: GENERAL COMMENTS</i> .....	40
<i>ON1100 - OTHER NEPA ISSUES: SCOPE OF PLANNING PROCESS</i> .....	40
<i>PN1000 - PURPOSE AND NEED: PLANNING PROCESS AND POLICY</i> .....	43
<i>PN2000 - PURPOSE AND NEED: PARK PURPOSE AND SIGNIFICANCE</i> .....	44
<i>PN4000 - PURPOSE AND NEED: PARK LEGISLATION/AUTHORITY</i> .....	45
<i>PN7000 - PURPOSE AND NEED: ADEQUACY OF EIS PURPOSE AND NEED</i> .....	47
<i>PN8000 - PURPOSE AND NEED: OBJECTIVES IN TAKING ACTION</i> .....	48
<i>PN9000 - PURPOSE AND NEED: ISSUES AND IMPACT TOPICS SELECTED FOR ANALYSES</i> .....	51
<i>PN11000 - PURPOSE AND NEED: OTHER POLICIES AND MANDATES</i> .....	52
<i>PO1000 - PARK OPERATIONS: GUIDING POLICIES, REGS AND LAWS</i> .....	53
<i>PO4050 - PARK OPERATIONS: IMPACTS OF NO ACTION/CURRENT CONDITIONS</i> .....	53
<i>RF1000 - REFERENCES: GENERAL COMMENTS</i> .....	54
<i>SE4000 - SOCIOECONOMICS: IMPACT OF PROPOSAL AND ALTERNATIVES</i> .....	58
<i>TE5000 - THREATENED AND ENDANGERED SPECIES: IMPACT OF NO ACTION/ CURRENT CONDITIONS</i> .....	59
<i>TE6000 - THREATENED AND ENDANGERED SPECIES: CUMULATIVE ACTIONS AND EFFECTS</i> .....	61
<i>VC1010 - AFFECTED ENVIRONMENT: IMPACTS TO MULTIPLE RESOURCES</i> .....	62
<i>VC11000 - AFFECTED ENVIRONMENT: SPECIES OF SPECIAL CONCERN</i> .....	63
<i>VC1110 - AFFECTED ENVIRONMENT: IMPACTS TO LANDS AND PARKS SURROUNDING GGNRA</i> .....	63
<i>VC6000 - AFFECTED ENVIRONMENT: MARINE AND ESTUARINE RESOURCES</i> .....	64
<i>VC9000 - AFFECTED ENVIRONMENT: VEGETATION</i> .....	64
<i>VE4050 - VISITOR EXPERIENCE: IMPACTS OF NO ACTION/CURRENT CONDITIONS</i> .....	65
<i>VE4060 - VISITOR EXPERIENCE: ROLE OF PARK IN PROVIDING VISITORS AN EXPERIENCE OF AREAS WHERE DOGS ARE NOT ALLOWED</i> .....	68
<i>VR2050 - VEGETATION AND RIPARIAN AREAS: IMPACTS OF NO ACTION/CURRENT CONDITIONS</i> .....	69
<i>VR5000 - VEGETATION AND RIPARIAN AREAS: CUMULATIVE ACTIONS AND EFFECTS</i> .....	69
<i>VS2000 - VISITOR CONFLICTS AND SAFETY: METHODOLOGY AND ASSUMPTIONS</i> .....	69
<i>VS4050 - VISITOR CONFLICTS AND SAFETY: IMPACTS OF NO ACTION/CURRENT CONDITIONS</i> .....	70
<i>VS4060 - VISITOR CONFLICTS AND SAFETY: ASPECTS OF VISITOR CONFLICTS ON GUIDE DOGS/ SERVICE DOGS</i> .....	74
<i>VU1000 - VISITOR USE: GUIDING POLICIES, REGS AND LAWS</i> .....	75
<i>VU2000 - VISITOR USE: METHODOLOGY AND ASSUMPTIONS</i> .....	76
<i>VU4010 - VISITOR USE: ACTIONS OF DOG OWNERS</i> .....	76
<i>VU4020 - VISITOR USE: PROFESSIONAL DOG WALKERS</i> .....	78
<i>VU4050 - VISITOR USE: IMPACTS OF NO ACTION/CURRENT CONDITIONS</i> .....	79

<i>VU5000 - VISITOR USE: CUMULATIVE IMPACTS</i> .....	82
<i>WH2000 - WILDLIFE AND WILDLIFE HABITAT: METHODOLOGY AND ASSUMPTIONS</i> .....	82
<i>WH4050 - WILDLIFE AND WILDLIFE HABITAT: IMPACT OF NO ACTION/CURRENT CONDITIONS</i> .....	83
<i>WH5000 - WILDLIFE AND WILDLIFE HABITAT: CUMULATIVE ACTIONS AND EFFECTS</i> .....	87
<i>WQ4000 - WATER RESOURCES: IMPACT OF PROPOSAL AND ALTERNATIVES</i> .....	88
APPENDIX 1. CORRESPONDENCE INDEX OF ORGANIZATIONS.....	89
APPENDIX 2. CORRESPONDENCE INDEX OF INDIVIDUAL COMMENTERS .....	90
APPENDIX 3. INDEX BY ORGANIZATION TYPE .....	102
APPENDIX 4. INDEX BY CODE .....	113

## INTRODUCTION AND GUIDE

### ***INTRODUCTION***

On March 3, 2006, Golden Gate National Recreation Area (GGNRA) released the Public Scoping Brochure for the Dog Management Plan/EIS for public review and comment. The public was invited to submit comments on the scope of the planning process and potential alternatives through April 24, 2006. During the scoping period, two public scoping workshops were held. The first was held at the Bay Model Visitor Center in Sausalito on April 4<sup>th</sup>, and the second was held at the Fort Mason Officers Club on April 5<sup>th</sup>. Both workshops presented information about current GGNRA dog management and the planning and negotiated rulemaking processes. Park staff and other National Park Service (NPS) specialists were on hand to answer questions and provide additional information to workshop participants. During the scoping period, over 500 pieces of correspondence were entered into the Planning, Environment, and Public Comment (PEPC) system either from direct entry by the commenter, or uploading of emails, faxes, and hard copy letters by NPS staff.

### ***THE COMMENT ANALYSIS PROCESS***

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers and the Dog Management Plan/EIS team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to *National Environmental Policy Act* (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- developing a coding structure
- employing a comment database for comment management
- reading and coding of public comments
- interpreting and analyzing the comments to identify issues and themes
- preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondences and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters, email messages, and written comment forms. All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the content of the comment rather than the number of times a comment was received.

## ***DEFINITION OF TERMS***

Primary terms used in the document are defined below.

**Correspondence:** A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, open house transcript, or petition.

**Comment:** A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis.

**Code:** A grouping centered on a common subject. The codes were developed during the scoping process and are used to track major subjects throughout the EIS process.

**Concern:** Concerns are subdivisions of codes. Each code was further separated into several concern statements to provide a better focus on the content of comments. For example, "Elements Common to All Alternatives" was broken down into four concern statements, while "Agency Rulemaking: Need for Emergency Action" did not need further refinement and only has one concern statement. In cases where no comments were received on an issue, the issue was not identified or discussed in this report.

All scoping comments were considered to be important as useful guidance and public input to the scoping process, but only substantive comments were analyzed in the Public Scoping Comment Summary Report. At this phase of the project, almost all comments are treated as being substantive, but four nonsubstantive codes were also identified. These codes represented general public opinion surrounding the issue of allowing dogs in GGNRA and whether there should be areas allowed for on or off leash recreation in GGNRA. If comments provided further details, such as specific areas where certain activities should be allowed, they were also assigned a substantive code and were analyzed further.

## ***GUIDE TO THIS DOCUMENT***

This report is organized as follows:

**Content Analysis Report-** This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

**Public Scoping Comment Summary**- This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and further organized into concern statements. Below each concern statement are representative quotes, which have been taken directly from the text of the public's comments and further clarify the concern statements.

**Correspondence Index of Organizations**- This provides a listing of all groups that submitted comments, arranged and grouped by the following organization types as defined by PEPC (and in this order): businesses; churches and religious groups; civic groups, conservation/preservation groups; federal government; NPS employees; non-governmental groups; recreational groups; state government; town or city government; tribal government; unaffiliated individuals; university/professional society. Each piece of correspondence was assigned a unique identification number upon entry into PEPC. This number can be used to assist the public in identifying the way NPS addressed their comments.

**Correspondence Index of Individual Commenters**- This provides a listing of all of the individuals who submitted comments during the public scoping period. Like the previous index, each correspondence was assigned a unique identification number which can be used to assist individuals in identifying the way in which NPS addressed their comments. This list is organized alphabetically.

**Index By Organization Type**- This list identifies all of the codes that were assigned to each individual piece of correspondence and is arranged by organization type. Individual commenters are also included in this report and are identified as Unaffiliated Individuals.

**Index by Code**- This lists which commenters or authors (identified by PEPC organization type) commented on which topics, as identified by the codes used in this analysis. The report is organized by code, and under each code is a list of the authors who submitted comments that fell under that code, and their correspondence numbers. Those correspondences identified as N/A represent unaffiliated individuals.

## CONTENT ANALYSIS REPORT

## Comment Distribution by Code

Code	Description	Number of Comments
AG1000	Agency Rulemaking: Need for Emergency Action	7
AL1000	Alternatives: Elements Common To All Alternatives	17
AL4000	Alternatives: New Alternatives Or Elements	197
AL5000	Alternatives: 1979 Pet Policy	54
AW1000	Animal Welfare: Impact on/to dogs	99
CC2000	Consultation and Coordination: Reg-Neg process	15
GA1000	Impact Analysis: Impact Analyses	23
GA2000	Impact Analysis: Use Trends And Assumptions	8
GA3000	Impact Analysis: General Methodology For Establishing Impacts/Effects	22
GC1000	Off-leash dogs: Support (non-substantive)	234
GC2000	Off-leash dogs: Oppose (non-substantive)	28
GC3000	General Comment: Support current management (non-substantive)	7
GC4000	General Comment: Continue to allow dogs within GGNRA (non-substantive)	22
GC4010	General Comment: Ban all dogs from GGNRA	13
LP1000	Laws and Policies: Impact of GGNRA actions on other NPS units' enforcement of servicewide policies and regulations	4
LU1000	Land Use: Policies and Historical Use	35
LU2000	Other Agencies Policies and mandates Regarding Dog Management	3
LU3000	Land Use: Dog Parks Provided by San Francisco and Other Municipalities	9
LU4000	Land Use: San Francisco Significant Natural Resources Area Management Plan	3
ON1000	Other NEPA Issues: General Comments	9
ON1100	Other NEPA Issues: Scope of planning process	24
PN1000	Purpose And Need: Planning Process And Policy	9
PN2000	Purpose And Need: Park Purpose And Significance	18
PN4000	Purpose And Need: Park Legislation/Authority	13
PN6000	Purpose And Need: Land Management Laws, Exec Orders	2
PN7000	Purpose and Need: Adequacy of EIS Purpose and Need	3
PN8000	Purpose And Need: Objectives In Taking Action	37
PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	23
PN11000	Purpose And Need: Other Policies And Mandates	3
PO1000	Park Operations: Guiding Policies, Regs And Laws	5
PO4050	Park Operations: Impacts of No Action/Current Conditions	21

RF1000	References: General Comments	17
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	8
TE2000	Threatened And Endangered Species: Methodology And Assumptions	3
TE5000	Threatened and Endangered Species: Impact of No Action/ Current Conditions	20
TE6000	Threatened and Endangered Species: Cumulative Actions and Effects	3
VC1010	Affected Environment: Impacts to multiple resources	18
VC1110	Affected Environment: Impacts to lands and parks surrounding GGNRA.	8
VC6000	Affected Environment: Marine And Estuarine Resources	3
VC9000	Affected Environment: Vegetation	8
VC11000	Affected Environment: Species Of Special Concern	10
VE4050	Visitor Experience: Impacts of No Action/Current Conditions	99
VE4060	Visitor Experience: Role of Park in Providing Visitors an Experience of Areas where Dogs are Not Allowed	1
VR2050	Vegetation and Riparian Areas: Impacts of No Action/Current Conditions	1
VR5000	Vegetation and Riparian Areas: Cumulative Actions and Effects	2
VS2000	Visitor Conflicts And Safety: Methodology And Assumptions	6
VS4050	Visitor Conflicts and Safety: Impacts of No Action/Current Conditions	71
VS4060	Visitor Conflicts and Safety: Aspects of Visitor Conflicts on Guide Dogs/ Service Dogs	3
VU1000	Visitor Use: Guiding Policies, Regs And Laws	7
VU2000	Visitor Use: Methodology And Assumptions	2
VU4010	Visitor Use: Actions of dog owners	126
VU4020	Visitor Use: Professional dog walkers	13
VU4050	Visitor Use: Impacts of No Action/Current Conditions	47
VU5000	Visitor Use: Cumulative Impacts	1
WH2000	Wildlife And Wildlife Habitat: Methodology And Assumptions	8
WH4050	Wildlife and Wildlife Habitat: Impact of No Action/Current Conditions	74
WH5000	Wildlife and Wildlife Habitat: Cumulative Actions and Effects	8
WQ4000	Water Resources: Impact Of Proposal And Alternatives	1

**Correspondence Distribution by Correspondence Type**

<b>Type</b>	<b>Number of Correspondences</b>
E-mail	32
Fax	1
Letter	178
Other	3
Park Form	21
Web Form	308
<b>Total</b>	<b>543</b>

**Correspondence Distribution by Organization Type**

<b>Organization Type</b>	<b>Number of Correspondences</b>
Business	1
Conservation/Preservation	23
Non-Governmental	6
Recreational Groups	6
State Government	1
Town or City Government	3
Unaffiliated Individual	503
<b>Total</b>	<b>543</b>

**Correspondence Distribution by State**

<b>State</b>	<b>Number of Correspondences</b>
Unspecified	1
AL	1
CA	533
CO	1
CT	1
GA	1
MO	1
NC	1
PA	1
VA	2
<b>Total</b>	<b>543</b>

## PUBLIC SCOPING COMMENT SUMMARY

### AGI000 - Agency Rulemaking: Need for Emergency Action

**Concern ID:** 12368

**CONCERN STATEMENT:** Commenters state legal authority exists to promulgate an emergency rulemaking outside of the negotiated rulemaking process based on threats to sensitive wildlife (such as the snowy plover), visitors and other pets as well as due to the time required to complete the negotiated rulemaking process.

**Representative Quote(s):** **Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31511      **Organization Type:** Conservation/Preservation

**Representative Quote:** Good cause exists to promulgate and enforce 36 C.F.R. § 2.15(a) (2) at the GGNRA on an expedited or emergency basis. As demonstrated by this petition, the voice control agenda has not been adequate to protect people, our pets, wildlife, or the park from harm caused by dogs roaming off-leash, and off-leash incidents are likely to increase due to recent court orders inhibiting the Park Service's ability to enforce park safeguards. As explained by the Humane Society of the United States and the International City/County Management Association, the voice control agenda and other non-physical pet restraint measures are inadequate to protect park visitors.( Geoffrey L. Handy, Humane Society of the United States, International City/County Management Association, Animal Control Management: A Guide for Local Governments (2001) ("Adequate restraint should be defined as physical control of animals; alternative methods such as voice control, electronic fences, and chemical sprays are not reliable for dogs whose basic predatory, sexual, or territorial defense drives have been triggered.") ) The Park Service thus faces an urgent problem that cannot be adequately addressed solely by the voice control agenda currently in place, and under similar circumstances courts have found that good cause exists to promulgate rules on an emergency basis. Hawaii Helicopter Operators Assn. v. FAA, 51 F.3d 212 (9th Cir. 1995).

**Corr. ID:** 187674      **Organization:** NPCA

**Comment ID:** 31562      **Organization Type:** Conservation/Preservation

**Representative Quote:** NPCA plans to engage in the EIS planning process, and looks forward to progress from the Negotiated Rulemaking Committee to implement leash laws. Still, the recommendations from the Committee may not be finalized until 2007, with implementation taking place in 2008. All the while, people, pets, and sensitive wildlife within the park would go unprotected. NPCA urges GGNRA to initiate emergency rulemaking procedures to restore leash law enforcement at the park on an interim basis until a long-term solution is identified.

**Corr. ID:** 185222      **Organization:** National Parks Conservation Association

**Comment ID:** 32045      **Organization Type:** Conservation/Preservation

**Representative Quote:** The National Parks Conservation Association (NPCA) writes in support of the petition filed on August 16, 2005 by a broad coalition of groups, calling for leash law enforcement during the negotiated rulemaking process, in efforts to help protect the resources and provide safe visitor experience at the Golden Gate National Recreation Area (GGNRA).

**Corr. ID:** 187667      **Organization:** Not Specified

**Comment ID:** 31487      **Organization Type:** Conservation/Preservation

**Representative Quote:** An appropriate response to this emergency petition would be to propose, accept 30 days of public comment, and make effective upon final publication in the Federal Register pursuant to 5 U.S.C. 553(d)(3) the following regulation:

36 C.F.R. 7.97 Golden Gate National Recreation Area.  
(d) Pets. The following are prohibited: Failing to crate, cage, restrain on a leash which shall not exceed six feet in length, or otherwise physically confine a pet at all times. Judicial review under the APA requires reviewing courts to "compel agency action unlawfully withheld or unreasonably delayed." 5 U.S.C. 706(1). Accordingly, the National Park Service cannot unreasonably delay action on this emergency petition. Consistent with this mandate, the Department of Interior's petition processing regulations, and the exigent circumstances that currently exist at the GGNRA, we expect a final response to this emergency petition within 60 days.

**AL1000 - Alternatives: Elements Common To All Alternatives**

**Concern ID:** 12369

**CONCERN STATEMENT:** Commenters stress that the plan should include details on how new and existing dog regulations will be implemented, such as stronger penalties and increased enforcement.

**Representative Quote(s):** **Corr. ID:** 185113      **Organization:** *Not Specified*

**Comment ID:** 31942      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I personally feel that as long as dogs are being picked-up after and are under voice control (not harassing people or wildlife) that a special ruling for these areas to remain off-leash should be written. I also believe that there should be very strong penalties and increased enforcement for those who do not pick-up after their pets, and for problem people who do not have their dogs under voice control (allowing them to harass wildlife or other park users).

**Corr. ID:** 185441      **Organization:** Golden Gate Audubon Society

**Comment ID:** 29510      **Organization Type:** Conservation/Preservation

**Representative Quote:** Because lack of enforcement at the park has been an ongoing issue of contention and because there can be no meaningful Dog Management Plan without enforcement, Golden Gate Audubon feels it is absolutely essential that all Alternatives include specific details on how existing and new dog regulations within the GGNRA will be enforced.

**Concern ID:** 12370

**CONCERN STATEMENT:** Commenters state that the following elements should be considered in all alternatives: clearly mark areas indicating acceptable use, establish new and retain existing voice control areas for off leash dogs, incorporate best practices used by other recreation areas, establish a panel to mediate disputes, encourage dog training classes, and require owners to carry leashes and dispose of waste.

**Representative Quote(s):** **Corr. ID:** 185427      **Organization:** *Not Specified*

**Comment ID:** 31936      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Other thoughts:  
-Allow dog-training classes in the GGNRA to reinforce the idea that voice-control does not mean no control.  
-Require that all dog owners carry a leash for each dog and evidence of the means to clean up after their dogs.  
-Require that all dogs are licensed and tagged.  
-Offer additional hiking trails or off-leash opportunities to people & dogs who've passed a higher level of training (a "golden bone" concept).

**Corr. ID:** 185427      **Organization:** *Not Specified*

**Comment ID:** 31933 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Rather than banning any single use, the NEPA study should look at "best practices" used by other recreational areas to reduce the impact of so many visitors. This might include switching trails to let an area "rest" or opening up even more space to distribute the activity. Voice-control areas should be clearly marked so that visitors understand they will encounter off-leash dogs. Conflict increased dramatically after 2001 because the signs that informed visitors about off-leash dogs were removed.

**Concern ID:** 12371

**CONCERN STATEMENT:** Commenter urges NPS to abort its Dog Management Plan rulemaking and EIS process, accept the outcome of the 2005 U.S. District Court ruling, and grandfather the GGNRA 1979 voice control policy as the GGNRA permanent policy.

**Representative Quote(s):** **Corr. ID:** 185003 **Organization:** *Not Specified*

**Comment ID:** 31937 **Organization Type:** Unaffiliated Individual

**Representative Quote:** To the Superintendent, Golden Gate National Recreation Area:

I urge the National Park Service to take the following steps:

- \* Abort its Dog Management Plan rulemaking and related EIS process.
- \* Accept the outcome of the 2005 U.S. District Court ruling without further objection.
- \* Grandfather the 1979 "voice-control" dog walking policy as GGNRA's permanent policy

**Concern ID:** 12372

**CONCERN STATEMENT:** Commenter states GGNRA should sustainably manage all areas of park, and if temporary closures are implemented for restoration purposes, other areas should be made available for off leash use.

**Representative Quote(s):** **Corr. ID:** 185113 **Organization:** *Not Specified*

**Comment ID:** 31943 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As you can probably tell by this point, I am an advocate for off-leash recreation in the GGNRA - not in every area - but certainly in every inch specific in the original 1979 Pet Policy, no less. If some areas are to remain closed that were originally included, than new areas should be opened up - because there are more and more people, these areas will be subjected to more and more use. I agree with reasonable **\*\*temporary\*\*** closures for restoration purposes, but these areas need to be managed sustainably with the users and the ecosystems in mind. For example, if you close off some areas to users, be sure to open other areas so that the remaining open areas are not trashed by concentrated, higher impact usage. Review some of the sustainable farming practices, as some of these management techniques may be useful in managing these heavily used areas.

### **AL4000 - Alternatives: New Alternatives Or Elements**

**Concern ID:** 12374

**CONCERN STATEMENT:** Commenters suggested numerous new alternatives or alternative elements to be considered during the development of the dog management plan, for example: fenced dog runs, limited hours for off leash dog walking, limited numbers of dogs per walker, protection of native wildlife, educational outreach, prohibition of certain breeds and behaviors, methods of enforcement, etc.

**Representative Quote(s):** **Corr. ID:** 165386 **Organization:** *Not Specified*

**Comment ID:** 29485 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am responsible for the management of over 2700 acres of public open space in Contra Costa County. The dog use rules I inherited are similar to those of East Bay Regional Parks, dogs allowed off-leash under voice and sight command. This regulation is a disaster for the natural resource and the non dog walking public.

In those areas where dogs are allowed, dogs should be on leash at all times in the GGNRA and if the Federal Government feels it needs to provide an off-leash area for the residents of San Francisco then that area must be fenced and dedicated for that use. Our experience with both parks and open space is that off-leash areas cannot safely be shared use.

**Corr. ID:** 183957 **Organization:** *Not Specified*

**Comment ID:** 30834 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In my opinion, Crissy Field strikes the perfect balance, allowing dogs to play on the beach but roping off the protected wetland areas. This could be used as a model for other areas.

**Corr. ID:** 184296 **Organization:** *Not Specified*

**Comment ID:** 30824 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The rules I have imposed upon myself for visiting the beach area are as follows: observing the density of visitors on the beach immediately adjacent to parking, especially visitors with small children. If it is crowded, I immediately opt to proceed on past the bridge to the adjacent beach, before letting my dog off-leash. The dog is always on leash in the parking area. Generally, I do not visit the beach on weekends unless it is before 10:00am or after 4pm to give ample time for families, picnickers or whomever to enjoy the beach area without fear of encountering off-leash dogs. If you are considering limitations on off-leash dogs, I would suggest implementing some kind of regulations limiting off-leash dogs to the further beach on weekends and holidays between the hours of 11-4.

**Corr. ID:** 184553 **Organization:** *Not Specified*

**Comment ID:** 29450 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I feel the main beach area, directly in front of the parking lot, is not a good place for this as well as the parking lot itself. I have seen dog charge kids, adults and other dogs there. There is way too much opportunity for conflict in this area. The spot that would work best would be the upper part of the beach. The bay beach past the pedestrian bridge and runs parallel with the marsh. There is less traffic and less conflict would occur. Also I think that dog owners should have to carry some sort of insurance to have their goes off leash when thing go wrong.

**Corr. ID:** 184717 **Organization:** *Not Specified*

**Comment ID:** 29562 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I hope the planners will consider the needs of disabled park users when negotiating the new dog management plan.

**Corr. ID:** 184777 **Organization:** GGA Conservation Committee

**Comment ID:** 31462 **Organization Type:** Unaffiliated Individual

**Representative Quote:** ALTERNATIVES

-The NPS-wide pet regulation requiring dogs to be restricted by cage or leash should be included as one of the alternatives.

-An alternative that establishes fenced, or otherwise physically separated, dog play areas within areas of the GGNRA that have no current or potential wildlife habitat value - including for breeding, for nesting, for feeding, or for roosting - should be included.

**Corr. ID:** 184817      **Organization:** *Not Specified*

**Comment ID:** 31153      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As far as Dog designated trails - I suggest that there is a map at all trail heads illustrating which trails are dog permissible - the problem with the trail system right now, is that once a dog owner heads out on an "allowed" trail they then come to a junction where the trail is not marked, even though on the other end it may be, and very likely they are not supposed to use it, but as it is not marked, and there was no guide at the road trailhead, they, sometimes quite innocently, end up on "non-allowable" trails.

**Corr. ID:** 184830      **Organization:** *Not Specified*

**Comment ID:** 31219      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I think the GGNRA could help keep dogs out of these areas by updating the signs that notify people that off limit areas are bird sanctuaries. Many of these signs are so faded that they are barely legible. The GGNRA should also mend the fences which have fallen in many spots. If the budget does not allow for these measures, I am confident that a fundraising campaign at the park would be successful in rising the necessary funding (especially if this is critical to maintaining off leash recreation).

**Corr. ID:** 184834      **Organization:** *Not Specified*

**Comment ID:** 31252      **Organization Type:** Unaffiliated Individual

**Representative Quote:** In general I would recommend elements be considered as part of an off leash dog policy:

-All dog owners should be required to get a \$50 annual permit from the GGNRA to use off leash areas. This should come in the form as a tag wearable around the dog's neck. The funds from this permit program should be sufficient to cover the salary for 1-2 additional park police, improvements to the fences protecting sensitive areas, new signage which will make it clear to dog owners and non-dog owners alike of the off leash areas, and more trash cans.

-Professional dog walkers (as defined as anyone entering the GGNRA with more than 3 dogs at the same time) should be required to get an annual permit (\$250) and should be prohibited from entering the GGNRA with more than 6 dogs at a time. Each of the dogs they bring to the GGNRA must also have GGNRA permits (or they are liable).

-Very high fines for any dog owner that does not pick up their dog's solid waste

-Very high fines for any dog owner that appears to be allowing their dog to enter marked sensitive areas or non off leash areas

-As an alternative to fines for violations, the park should consider "community service hours" where the violators would spend a several hours cleaning up trash from the beach

-Certain types of dangerous breeds should not be allowed to exercise off leash or without a protective muzzle

-Any breeding grounds for endangered species should be well marked and off limits to any dogs AND HUMANS during the breeding season

**Corr. ID:** 184834      **Organization:** *Not Specified*

**Comment ID:** 29954      **Organization Type:** Unaffiliated Individual

**Representative Quote:** alternative to fines for violations, the park should consider "community service hours" where the violators would spend a several hours cleaning up trash from the beach

**Corr. ID:** 184864      **Organization:** *Not Specified*

**Comment ID:** 30910      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The park MUST come up with an ENFORCED policy that allows dog owners some areas to run their pets off leash, but at the same time the park has been neglecting enforcing existing policies for areas where pets should have been on leash. Take a look at the Fort Mason meadow ANY TIME and see how many people comply with the posted regulation - in view of the superintendent's office! When my wife

couldn't even get a Park Police officer out of their vehicle to follow up on a complaint about a dog off leash, when my daughter (who has worked for several vets and is very comfortable with pets) had to restrain a loose pit bull until we could get an LE officer to respond (by the time they did she had walked the dog back to the owners apartment in the Presidio and tied it up in their yard), when there are entire areas of the park we can no longer visit due to the irresponsible actions of some dog owners who seem to be more interested in their morning Starbuck's coffee and their cell phone conversations, rather than controlling their pets - well - it's a sad state of affairs.

Dog run areas SHOULD be available, and in my opinion should be fenced for the protection of other park visitors and wildlife. Consider these areas sacrifice zones, if necessary. But just as important - regulations need to be aggressively enforced as well for the protection of other park visitors and natural residents. Too many dog owners in San Francisco seem to think that their dog's rights supersede all others.

**Corr. ID:** 184952      **Organization:** *Not Specified*

**Comment ID:** 29332      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Santa Cruz has a beach that before 10am and after 4pm dogs are allowed off leash. Central Park in NYC has something similar. Please consider that much of GG NRA is city parks. We really can co-exist peacefully. I would like to see Fort Funston be an off leash park all the time. Perhaps one section of Ocean Beach (as it was in the past) and then limited hours at Baker Beach. China Beach is always no dogs. I think this kind of compromise is realistic.

**Corr. ID:** 184959      **Organization:** *Not Specified*

**Comment ID:** 31091      **Organization Type:** Unaffiliated Individual

**Representative Quote:** With regard to dog management, the prime consideration should be any danger posed to native wildlife by dogs. I especially have in mind the snowy plover, which as you know is especially vulnerable because it nests on beaches. Dogs should not be allowed to run in any area that the snowy plover nests in. Certain species of swallow also require to be protected from being disturbed by dogs. And obviously there should be no free-running dogs in an area where seals pup.

Limantour Beach is a good example of the balancing of several needs, with dogs allowed to run free on one part of the beach and not the other.

**Corr. ID:** 184996      **Organization:** Nature in the City

**Comment ID:** 29440      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The current leash law in which all dogs should be on leash in National Parks is a good one. San Francisco is a special case to be sure. Any modification to this law to accommodate off-leash dog walking as a result of the Negotiated Rule-making process should result in dog play areas, not dissimilar to those created by SF Recreation and Parks, in which the dogs are contained in an area where they cannot do damage to the natural, cultural, recreational, and scenic resources of the GGNRA. Any area should be 100% fenced and patrolled to the extent possible.

**Corr. ID:** 185028      **Organization:** Golden Gate Audubon

**Comment ID:** 30992      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please create and enforce a dog management program that supports the important migratory bird corridor for our Pacific Flyway. Dog owners need to be educated and the rules enforced so that their pets don't continue to erode the safety for our birds. My husband and I enjoy these open areas but we truly wonder what it will look like for the future generations if we don't invoke meaningful measures to protect our birds i.e., the Western Snowy Plover, Northern Spotted Owl, our Brown Pelicans and Bank Swallows. Along with clear rules, education and funding for enforcement, we could make great progress toward everyone enjoying our shared beautiful surroundings.

**Corr. ID:** 185074      **Organization:** *Not Specified*

**Comment ID:** 31436      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I hope that the EIS will focus on management of resources so that recreational users will be able to continue to enjoy large areas of the GGNRA. For example, rotating areas for restoration can be done in high use areas. High use areas should also emphasize ground covers that can take high use (wasn't that the original reason for planting ice plant!), and trees and bushes that can protect to some degree against the wind.

**Corr. ID:** 185237      **Organization:** *Not Specified*

**Comment ID:** 29432      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Some commonsense rules should apply to all dog owners using GGNRA lands, whether on or off leash:

1. All dogs must have current rabies tags and current registration and these should be visible to Park officials.
2. All dogs allowed in the general property of the Park are to be restrained by a leash held firmly by a responsible person.
3. Punitive fines should be levied and collected for infractions of Park laws
4. Vicious or barking dogs should not be allowed in the Park and should be evicted by Park officials.
5. Educational materials should be made available to dog owners so they better understand the value of the National Park and why it needs their protection and cooperation. I would suggest dog owners be drafted to write the preponderance of the information.

In addition to items 1-4, above, add the following:

1. No dog under 4 months should be allowed into an off leash area.
2. Owner should have proof that his/her dog has passed obedience training including voice control; no exceptions. Demonstrations should be required that the dog will obey commands.
3. Dog owners should pay a permit fee for being allowed to use the off leash area in the National Park, offsetting the cost of policing the off leash area and cleaning it up. This should be priced at "market rate" and must be both current and visible at all times while in off leash areas.
4. No professional dog walkers should be allowed to have their dogs in the Presidio at all and should be fined very heavily/per dog, for breaking the laws.
5. All off leash users must carry a leash per dog.

**Corr. ID:** 185256      **Organization:** *Not Specified*

**Comment ID:** 31308      **Organization Type:** Unaffiliated Individual

**Representative Quote:** There is a small area within the Presidio whose existence is never mentioned in discussions of pet management problems, namely, West Pacific Avenue between the Fifth Avenue gate and the entrance to Mountain Lake (City) Park. This area provides a model pet/people/NPR environment which could be replicated in other locations at very modest expense.

The minimum requirements are:

- 1) A rectangular strip approximately 5 blocks long, 40 feet wide, with no through motor traffic.
- 2) A paved (or crushed recycled concrete) portion 12 feet wide to accommodate maintenance trucks, bicyclists, strollers, and Little Old Ladies (and Gents) who need a firm surface to walk on.
- 3) Dirt, weeds and wildflowers for the remainder of the strip, to accommodate joggers, dogs and small children who need room to run.
- 4) Covered trash cans at reasonable intervals (1-2 blocks) that are emptied twice a week.
- 5) Poop-bag dispensers at each entrance point to the area.
- 6) Absolute fencing, which might include:

- a- existing walls (we have part of the Historic South Wall of the Presidio)
  - b- chain link fence (which the NPR considers to have "negative visual impact"). Ours is covered with blackberry (native) and ivy (non-native, but there must be a native substitute), and there are wildflowers (native) at the base of the fence in spring, and nasturtiums (non-native, but self-sowing and pretty) in summer and fall, making quite a "positive" visual impact.
  - c- "Withies", made of native willow boughs, such as the local Native Americans used to build enclosures. (Surely there is a Historian/Ranger on your staff who could teach local school children to make these from pruned or fallen branches; they could be used to mask the chain link fence and might even take root. Or they can be bought at Smith & Hawken.)
- 7) No place to sit, because this is not a mini-park, it's for walkers, 2, 3, & 4-legged.

**Corr. ID:** 185257      **Organization:** *Not Specified*

**Comment ID:** 31359      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Although we are very much in favor of off-leash recreation, preserving the integrity of the area is also a priority, especially if there are endangered species. One solution would be to fortify the fencing around protected areas and post more signs indicating it is an off-limit area. Many of the signs at Ft. Funston indicating areas that are protected because of the bank swallows have been knocked down by the weather or are so faded they are unreadable. One suggestion would be to post signs at the entrance to the park stating that the area is an off-leash area so that visitors are warned ahead of time. If the signs could be in other languages that would be a tremendous help. I've noticed several foreign visitors in the park, especially in the summer; and they seem to be surprised by dog's off-leash. Maybe along with the sign, there could be a map indicating where there are other areas that do not allow dogs at any time or, if they do, they must be on-leash.

**Corr. ID:** 185278      **Organization:** *Not Specified*

**Comment ID:** 30964      **Organization Type:** Unaffiliated Individual

**Representative Quote:** You seem to be set on educating people about the Park and how to take care the environment. Why not require dog owners to take a class on the Park, care of the land, fire prevention, etc and then issue a GGNRA leash that will allow them to be in the Park educated and watching out for the Park.

**Corr. ID:** 185284      **Organization:** *Not Specified*

**Comment ID:** 29209      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I like fenced dog runs. If large enough dog runs provide areas to run dogs off leash. Most areas should be leash only. Please protect native plants and animals from dogs. Use fencing to fence off areas to dogs. Gates for people with signs stating 'no dogs' or 'leash only'. Some areas should be no dogs.

**Corr. ID:** 185298      **Organization:** *Not Specified*

**Comment ID:** 29475      **Organization Type:** Unaffiliated Individual

**Representative Quote:**

1. All dogs licensed and wearing dogs tags.
2. Provide fenced/secured area for off leash dog group play or swim.
3. Dogs on leash in all public areas, walking paths and roads-especially where children and families are congregating.
4. Dog walking businesses to follow same rules.
5. offenders to be cited with increases in fines for multiple occasions' non-compliance.
6. Offenders required to attend dog obedience classes & dog management programs to learn best method of training and exercising dogs to provide happy environment and home for them.
7. Suggestion/requirement male dogs are neutered if/when they display aggressive behavior or when owner not responsible in constraining bitches in heat-&/or raising puppies.

**Corr. ID:** 185330      **Organization:** *Not Specified*

**Comment ID:** 31037      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Trail use by dogs on leash at all times and may be off leash only in enclosed designated "dog parks" which have poop scoopers (long handles), water to clean them off and covered poop bins collected daily. Dog parks should be located near parking area and dogs on leash until in park. Enforcement is imperative. To raise money for staff maintenance and volunteer efforts by dog owners, "events" with a fee-a dog show could be a feature each year(run by a dog advisory committee/Humane Society). These fees could help pay for the necessary support of on leash laws.

**Corr. ID:** 185358      **Organization:** *Not Specified*

**Comment ID:** 30965      **Organization Type:** Unaffiliated Individuals

**Representative Quote:** We propose that the NRA Committee for Dog Management (GGNRA) consider that there will be beaches, trails and other areas for "off leash" recreation of dogs by owners or responsible persons and that these be accessible from parking areas.

In addition, we propose that there also be areas, beaches, trails etc which are designated for use of those with dogs on a lash or with dogs "off leash" possessing an Off Leash License or Certificate.

This license would be issued by a certified Humane Society for a fee after the dog had passed an obedience test reflecting appropriate behaviors and training for "off leash" recreation. Humane Societies would, also, and currently do have obedience classes which could prepare dogs for the Off Leash Test. One additional result of this would be a close and mutually satisfying cooperation between the GGNRA and Humane Societies.

**Corr. ID:** 185411      **Organization:** Sequoia Audubon Society

**Comment ID:** 31232      **Organization Type:** Conservation/Preservation

**Representative Quote:** Should the rulemaking committee decide that off leash dog walking is to be allowed on specific portions of GGNRA, our stance will be the following:

Areas open to dogs must be those where there are no endangered or threatened species or species of special concern.

Seasonal closures must be allowed for species needing breeding protection.

GGNRA must have the manpower to enforce compliance in all of the areas where off leash dog walking is allowed.

**Corr. ID:** 185429      **Organization:** *Not Specified*

**Comment ID:** 29427      **Organization Type:** Unaffiliated Individual

**Representative Quote:** In crafting a compromise, please:

1. Acknowledge that off-leash dog walking is a vital use of GGNRA resources for the reasons discussed above and that allowing dogs and people to intermingle is an important educational goal.
2. Educate people how to interact with dogs. Many problems in human-dog interaction have resulted from poorly socialized people. If there is a disagreement between two sentient beings, usually both are at least partly at fault. Hold people to an expected standard of behavior, just as we hold dogs.
3. If possible, allow dogs to play off-leash in the areas that were provided for them in the 1979 dog walking policy.
4. Require that any regulation, e.g., picking up your waste, should apply equally to all those who use the GGNRA.
5. Allow off-leash dogs access to the water. There are other small, fenced in areas in San Francisco where dogs may play. However, they do not have a Bay or an ocean. It is critical for the health and well being of many dogs, particularly large breeds, to be

- allowed unfettered access to play in the surf. Fencing in an area that does not include the water is simply an unacceptable alternative and will cause more problems than it solves.
6. If necessary, limit the number of dogs per human guardian. This will, undoubtedly, be a hardship for the professional dog walkers, who provide an invaluable service to urban dwellers. However, there are only so many dogs one can have under voice control at one time. I have seen dog walkers in small parks bring in 12 or 14 dogs. This upsets everyone in the park, since their dogs constitute a pack and they upset the social hierarchy and these irresponsible dog walkers can not control all the dogs under their care.
  7. Prohibit certain breeds, like pit bulls, from being off-leash. I know this is unacceptable to a fringe element of the dog lover community, but more responsible owners realize that this breed is responsible for most of the serious problems.
  8. Prohibit and punish specific, clearly specified behaviors.
  9. Do not punish everyone for the misdeeds of a minority.

**Corr. ID:** 185445      **Organization:** *Not Specified*

**Comment ID:** 31973      **Organization Type:** Unaffiliated Individual

**Representative Quote:**

16. There should be trash cans available on dog trails
17. Should have poop scooper/containers with water to spray clean for the next dog user as in Sausalito fenced dog park
24. Get and publicize information on dog poop methane conversion program in San Francisco- incentive to pick up poop in biodegradable bags to recycle it into energy rather than have it going into landfills (pilot city program administered by Norcal Waste).
30. There should be free time (early morning) when beaches are open for dogs, however, closed later in the day when human use is more typical to avert problems of interaction, possible liability, etc.
32. Consider using volunteers. Bay Front Park and Remington Park (Sausalito) have dog parks with a volunteer group that maintains them.
33. Require:
  - Off-leash permits issued by the local Humane Society; obedience certification required
  - Designated dog beaches and other where dogs are prohibited for visitors who don't like dogs
  - Designated dog trails with or without leashes (but dogs certified)
  - Logical dog trail connections
  - Reasonable enforcement - flexible and fewer guns

**Corr. ID:** 185440      **Organization:** *Not Specified*

**Comment ID:** 30918      **Organization Type:** Unaffiliated Individual

- Representative Quote:** The parameters for authorized off leash/off trail dog walking areas at Fort Funston should include the following:
- THE OFFLEASH DOG AREA MUST BE ENCLOSED/FENCED. This is the only way to limit the physical area of destruction of wild plants and animal habitat and to allow other users to be able to enjoy the park.
  - THE OFFLEASH DOG AREA MUST BE ADJACENT TO THE MAIN PARKING AREA. If this is done, many people will stay in the off leash area with their dog during their entire visit and this will minimize conflicts with other users and help protect resources. This is also the area that already has the least vegetation and is the most heavily impacted from dog and human use.
  - THERE MUST BE A MONITOR ON THE WEEKENDS AND HOLIDAYS. A monitor is needed to make sure that dogs that leave the designated off leash area and go onto the trails are on a leash, so they do not trample plants and disturb other visitors and so dog owners will not need to make a lot of noise calling their dogs.
  - NO DOGS ON BEACHES. Off leash dogs should not be allowed on beaches at Fort Funston, Rodeo Beach, Stinson Beach and elsewhere. They chase birds, or just cause the birds to leave by being there. It is upsetting to see dogs on the beach chasing birds. It is not possible to stop this, because the dogs run much faster than the owners and simply do not immediately obey commands. I have also seen dogs urinate in the surf zone, near

where kids are wading and surfers are swimming. This is disgusting and totally incompatible with recreation by other users.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31538      **Organization Type:** Conservation/Preservation

**Representative Quote:** Because of the risks associated with running dogs off-leash, responsible animal welfare organizations around the country have established minimum standards and essential safeguards to ensure that dogs can engage in off-leash recreation without harm. These safeguards include (1) adequate fencing that dogs cannot dig under or jump over to ensure that dogs will not get lost or wander into dangerous situations; (2) an appropriate acreage so that if fights or other emergency situations arise dog owners can quickly reach their pets to address the situation; (3) consistent monitoring to ensure that poorly behaved dogs are removed before altercations occur; and (4) regular maintenance to ensure that the area remains a clean and healthy place for dogs to play.

**Corr. ID:** 187672      **Organization:** Guide Dog Users Inc

**Comment ID:** 31554      **Organization Type:** Non-Governmental

**Representative Quote:** I am writing to you on behalf of Guide Dog Users, Inc. (GDUI) an international organization dedicated to advocacy, peer support, public education and all aspects of training, working and living with dogs specially-trained to guide blind and visually-impaired people. GDUI does not train or place guide dogs; but acts as an independent resource network; providing information; support and advice concerning guide dogs; guide; dog training and access laws to its members; the media and the public at large.

GDUI urges you to support the adoption of regulations requiring dogs to be leashed while in the Golden Gate National Recreation Area, as described in the petition dated August 16, 2005 and submitted by a broad coalition of groups.

**Corr. ID:** 187674      **Organization:** NPCA

**Comment ID:** 31561      **Organization Type:** Conservation/Preservation

**Representative Quote:** Federal regulations require dogs to be leashed or otherwise physically restrained in the National Park System. Despite that, GGNRA is the only unit of the National Park System known not to enforce leash laws throughout the park. Leash laws provide important safeguards for people, our pets, wildlife, and our parks, and the National Park System's leash law has effectively protected every other unit within the system while providing responsible access for dogs and owners for decades. In addition to federal regulations, a poll included in the materials with the petition shows that more than 70 percent of Bay Area residents are in favor of leash law enforcement at the park, revealing that the current voice control measures are not the preferred method for pet management.

**Corr. ID:** 187676      **Organization:** ASPCA

**Comment ID:** 31564      **Organization Type:** Non-Governmental

**Representative Quote:** On behalf of the American Society for the Prevention of Cruelty to Animals (ASPCA) and its 111,000 California members and donors, I urge you to support the adoption of regulations requiring dogs to be leashed, or otherwise humanely restrained, while in the Golden Gate National Recreation Area, as described in the petition dated August 16, 2005 and submitted by a broad coalition of groups.

The ASPCA supports enforcement of leash laws in general because such laws provide important safeguards for people and pets. Enforcement of the National Park System's leash law would allow pets reasonable access to the Park while protecting people, pets, wildlife and the park itself from the threats imposed by off-leash dogs.

The petition articulately sets forth the factual basis for enforcement of the National Park System's leash laws. Therefore, I again urge you to support for promulgation and

enforcement of 36 C.F.R. Section 2.15(a) (2) at the Golden Gate National Recreation Area.

**Corr. ID:** 184932      **Organization:** Safe parks for kids

**Comment ID:** 31946      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Dogs should be required to be on leash at all times in the park. This is required for public safety, nuisance, and the protection of the environment (e.g., native animals, vegetation, pollution from excessive dog urine and excrement). The only exception would be in designated off leash areas where these problems can be controlled. The off leash areas would be fenced in on the grass, or designated to one beach with natural barriers. Dog owners have mostly ignored the current leash laws, and they will continue to not leash dog unless there is designated off-leash areas. A strong leash law is needed to protect park visitors from attacks and the continued nuisance of unleashed dogs.

**Corr. ID:** 185445      **Organization:** *Not Specified*

**Comment ID:** 31965      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The dog park is not adequate recreation, thus shouldn't use "dog park" to restrict off-leash. 1. Consider only fenced areas for dogs (free-running), leash enforcement for any trail activity. Separating areas for small and large dogs may be ideal depending on dog population in the area.

2. Dogs should have current license to ensure shots are current

6. Need poop pick-up bags at area and a collection of inexpensive (donated) leashes in case people forget theirs. For example, at Sausalito dog park, they have bags available in any fenced dog area in park and require owner to pick up after their dog(s) immediately.

7. Participant "ownership" and management of area to informally keep standards or a series of violations can close an area

8. Need established standards and a list of behavior that meets/does not meet them and put a kiosk at parking lot

9. Work with humane society to inform people about adopting pets and to help with behavior training.

10. Should ticket dog owners without licenses. Money should go to a fund dedicated to enforcement

11. Establish a standard ratio for staffing to supervise dog areas (i.e., can't open a dog park unless there is adequate staffing).

12. Could work with dog groups and Humane Society to staff parks with volunteers with ID armband (like horse patrol)

13. Dogs should not be on nature trails because people will let them off leash

**Corr. ID:** 185421      **Organization:** Crissy Field Dog Group

**Comment ID:** 32044      **Organization Type:** Recreational Groups

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

**Concern ID:** 12377

**CONCERN STATEMENT:** Commenters suggested off leash dog walking should be permitted in specific areas of the park.

**Representative Quote(s):**

**Corr. ID:** 165502      **Organization:** *Not Specified*

**Comment ID:** 31034      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I believe that making Fort Funston an officially off-leash area

for dogs (both along the upper portion of the forts and along the beach) would provide a good compromise for dog owners and people wishing to stay away from dogs.

**Corr. ID:** 184243      **Organization:** *Not Specified*

**Comment ID:** 30906      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I believe that East Beach is the appropriate place for this "off-leash" area to be established. I have no objections to requiring that dogs be leashed when on the running/walking path from East Beach to the Warming Hut or in fact anywhere else in the San Francisco Presidio portions of the park.

I would also make sure to designate in signage that the dog beach is not the appropriate place for small children to play in the sand. Seeing small children digging in the sand where dogs urinate and defecate is disgusting and I can't imagine the stupidity of any parent who would allow his or her child to play on what is presently the de-facto off leash dog beach.

So, signage at East Beach should clearly explain that this beach is reserved for DOGS, not sunbathing for humans or as a sand play area for small babies. The signs should direct parents who wish to find an area for their children to play in the sand to use the beach area near the Warming Hut, which should be designated 100% off limits to dogs, so the sand may be "good enough to eat" for all our children.

**Corr. ID:** 184554      **Organization:** *Not Specified*

**Comment ID:** 31076      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am hoping you are also including the "great meadow" area of Ft. Mason as a potential off-leash site for dogs.

**Corr. ID:** 184605      **Organization:** *Not Specified*

**Comment ID:** 30867      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Absent any reliable scientific data indicating damage to the environment and biosphere specifically attributed to dog walking, the dog walking under voice control areas should be expanded to include all fire roads in the GGNRA. These are currently used by vehicles and heavy equipment (road graders, dump trucks and small bulldozers) and dog walking should not impact these areas negatively. All dog walking areas should require dog walkers to pick up any dog feces and remove them from the GGNRA. Dog walkers should be instructed to keep their dogs on the fire roads and be limited to three dogs per person.

**Corr. ID:** 184640      **Organization:** Crissy Field Dog Group

**Comment ID:** 30885      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The beach under discussion is divided into three areas: East beach, adjacent to public parking, toilets and benches, it stretches from the St Francis Yacht Club to the bridge over the inlet to the lagoon. This is the most over utilized area of the three, predominantly by families with children (on calm, sunny days), the general public who arrive by car, by wind-surfers and by people who do not want to walk to far from their cars. It is NOT an especially good place for the preferred activities by off-leash dogs. Central Beach, the area running west of the bridge and lagoon inlet to the rocky outcropping where the beach begins to curve north (about a half-mile stretch) is the most isolated from cars and hardly used by the general public except on very warm/sunny days and weekends. On a windy, foggy or cloudy day (which pretty much describes about 90% of the year) you can fire cannon down that beach and only hit a few happy dogs and their owners. This is the ideal stretch of sand at Crissy for dogs. Granted, it's a bit of a walk from the parking lots but then that is why it's called dog walking. Beyond Central Beach, from the curve at the west end of that stretch to the road to Fort Point is West Beach. This area also has parking and is popular with families because of the picnic tables and it is more protected from the prevailing westerlies. It is also an area

claiming itself a bird refuge for endangered species. Again, NOT a good mix with playing dogs. By focusing on Central Beach, which is ideal for healthy dog play, and not competing with the other recreation uses (families, children, older and disabled people, wind surfers) predominant at East and West Beaches, an ideal solution can be achieved for all. I have excluded all reference to the grassy areas because my observation is that they are relatively underutilized compared to the sand.

**Corr. ID:** 184643      **Organization:** *Not Specified*

**Comment ID:** 29229      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am in favor of off-leash dog areas in Crissy Field, Fort Funston, Baker Beach (west part), Lafayette Park, Alta Plaza, the Presidio (near Louis Kahn Playground) and many other parks. I think Lafayette Park should have a fenced in area where the current off leash dog area is, with benches and lighting on Octavia from Sacramento to Washington.

**Corr. ID:** 184782      **Organization:** *Not Specified*

**Comment ID:** 30744      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Ideally, please allow dogs to be off-leash in the upper dunes because the beach is accessible only to those in good health and without any mobility impairments. If you need a compromise measure to accomplish the purpose of addressing variety of use - then restrict off-leash access by time of day.

**Corr. ID:** 184834      **Organization:** *Not Specified*

**Comment ID:** 31256      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Baker Beach:

-Suggestion: Limit off leash use to the area south of the stream. This area is less frequently visited by families with kids because of its distance from the parking lot and there are no dunes that need protecting. Do not allow off leash use at any time in the remainder of the beach area.

-It is critical that the park installs more robust fences along the dunes rather than the single strand of white iron rope that current exists along some, if not all, of the dunes. If the park is serious about protecting the dunes they should be ashamed of the current silly fence.

-In order to make it easier for dog owners to dispose of their pet waste the park should also try to keep trash cans somewhere along the stretch of beach south of the stream. Currently there is one trash can north of the stream behind the roped off fence.

-The park should put up a bigger sign notifying dog owners and parents that the water that comes out of the pipes is often run off from the streets and can be highly polluted. Ocean beach:

-Suggestion: Limit off leash use to times of the day when there are minimal non-dog owning visitors (i.e. before 10 am and after 5:30 pm). Dogs should also be limited to the area north of Lincoln blvd to avoid any possible damage to the dunes.

**Corr. ID:** 184839      **Organization:** *Not Specified*

**Comment ID:** 29489      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The GGNRA sites that I enjoy off-leash now and wish to continue using are: Fort Funston & Burton Beach, Baker Beach, Crissy Field, Ocean Beach, Presidio and West Pacific in San Francisco. I also use Milagra Ridge, Sweeney Ridge in San Mateo County and some GGNRA sites in Marin County

**Corr. ID:** 184942      **Organization:** *Not Specified*

**Comment ID:** 29417      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I think that there should be no dogs allowed in Tennessee Valley, Marin Headlands, Pt. Reyes, Sweeney Ridge, Milagra Ridge, Phleger Estate, Mori Point, Muir Woods, Alcatraz, and Olema Valley.

If dogs are to be allowed on GGNRA land at all, I would propose that areas that should allow dogs on-lead include Crissy Field, parts of Lands End, the cliffs at Fort Funston, and all of Ocean Beach. The only areas where dogs off-lead might be permissible would be areas that are sufficiently urbanized, contained, and accessible and already heavily disrupted by human foot traffic and development: Ocean Beach along the promenade below the Cliff House only, Sutro Heights, Baker Beach, Fort Mason, areas of the Presidio and China Beach.

**Corr. ID:** 184981      **Organization:** PEF

**Comment ID:** 30864      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Pacifica: The area most commonly used for off-leash dog walking is Mori Point. It is one of the most accessible places in Pacifica- not too steep, centrally located, reasonable parking- unlike most of the areas in Pacifica. It should be considered for off-leash walking. I believe environmental issues there could be mitigated. There is little user conflict anywhere in Pacifica.

**Corr. ID:** 184991      **Organization:** *Not Specified*

**Comment ID:** 29476      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As we are play at Crissy Field daily, it is not too difficult to notice that the vast majority of people and dogs use the area of the beach that I will describe as "East of the River that runs under the walking bridge and empties into the Ocean." In fact while at the beach yesterday the West side of the "river" only had two people walking around which is generally the case every time we are at the beach. This area "West of the River" would be the perfect area to designate as the off leash area.

It would be a fair compromise to contain the off leash area of the beach to the area "West of the River that runs under the walking bridge and empties into the Ocean." As this area on the west side of the "river" is mostly under utilized this would be a perfect compromise that would make everyone happy, parents, kids, dogs, wind surfers, etc.

**Corr. ID:** 185226      **Organization:** *Not Specified*

**Comment ID:** 29220      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I send this to tell you that the Ft Funston area is used by primarily dogs. As this is the one site I can take my dogs to off leash I insist that a portion of this area, much used over the years primarily by dogs and owners, be set aside for dogs. If we are to have one area, that is fine, provided that it is large enough to accommodate the enormous numbers of dogs using this site every single day.

**Corr. ID:** 185443      **Organization:** *Not Specified*

**Comment ID:** 31039      **Organization Type:** Unaffiliated Individual

**Representative Quote:** -Allow off leash dog walking at any time on the beach that runs from the stream that flows between the lagoon and the Bay, west, to the first pier. I have observed far more dogs swimming and running on this beach than people over the past 20 years which is certainly understandable, considering the elements.  
-Off leash dog walking should also be allowed on the beach north of the east parking lot during certain morning and evening hours when young children and picnickers are not using the beach. Hours for off leash dog walking could be extended during the week (Monday-Friday) when children are in school.  
-Allow off leash dogs at all times on the meadow from the lagoon to the west bluff picnic area. This area is used infrequently, and is perfect for off leash dogs to run free.  
-Include the Presidio Trust land (area "B") in the Management Plan.

**Corr. ID:** 185445      **Organization:**  
*Not Specified*

**Comment ID:** 31972      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 9. Consider Ft. Baker trail/road to water tower for voice control area

**Concern ID:** 12386  
**CONCERN STATEMENT:** Commenters suggested off leash dog walking should not be permitted in specific areas of the park.

**Representative Quote(s):** **Corr. ID:** 184834 **Organization:** *Not Specified*  
**Comment ID:** 31253 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Crissy Field:  
-Suggestion: Limit "normal hour" off leash use to the beach areas west of the marsh outlet and east of the rock jetty. This area is much less utilized by non dog owners, and more specifically is much less utilized by kids and families because it is a longer walk from the various parking areas.  
-Do not allow off leash use in the heavily visited beach area in front of the east parking lot (east of the marsh outlet) except for early morning hours (prior to 9 am). Very few people other than dog owners and joggers visit Crissy field prior to 9 am.  
-No off leash use at any time on the fields and lawns or on the beach adjacent to the Farallon Islands administration buildings.  
-The park should be responsible for maintaining the fences which are designed to keep dogs and humans out of the restoring dunes. These fences are often washed out by storms, winds and high tides making them ineffective as a deterrent. Assuming the fences are maintained it would be appropriate for the park police to ticket any dog owner who allows their dog to enter these areas AND also any parent that allows their kids to enter these areas. These rules must be equally applied. Kids can do as much if not more damage to restoring dunes relative to dogs.  
-The park should also try to keep trash cans at each beach entrance to make it easier for dog owners to dispose of their pet waste.  
-Please note that for dog owners Crissy field is the by far the most important aspect of the GGNRA. It is the only place that dogs can swim because of the limited surf.

**Concern ID:** 12392  
**CONCERN STATEMENT:** Commenters suggested specific areas within the park be restricted to on leash dog walking.

**Representative Quote(s):** **Corr. ID:** 185411 **Organization:** Sequoia Audubon Society  
**Comment ID:** 31229 **Organization Type:** Conservation/Preservation  
**Representative Quote:** Sequoia Audubon Society wishes to go on record as recommending on leash dog walking in GGNRA managed lands, where dog walking is appropriate at all. Our experience of voice control management of dogs is that it is not an effective way to control dogs on park lands

**Concern ID:** 12393  
**CONCERN STATEMENT:** Commenters suggested specific areas of the park where no dogs should be permitted, on or off leash.

**Representative Quote(s):** **Corr. ID:** 184942 **Organization:** *Not Specified*  
**Comment ID:** 29417 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** I think that there should be no dogs allowed in Tennessee Valley, Marin Headlands, Pt. Reyes, Sweeney Ridge, Milagra Ridge, Phleger Estate, Mori Point, Muir Woods, Alcatraz, and Olema Valley.

If dogs are to be allowed on GGNRA land at all, I would propose that areas that should allow dog's on-lead include Crissy Field, parts of Lands End, the cliffs at Fort Funston,

and all of Ocean Beach. The only areas where dog's off-lead might be permissible would be areas that are sufficiently urbanized, contained, and accessible and already heavily disrupted by human foot traffic and development: Ocean Beach along the promenade below the Cliff House only, Sutro Heights, Baker Beach, Fort Mason, areas of the Presidio and China Beach.

**Concern ID:** 12394  
**CONCERN STATEMENT:** Commenters recommend banning all dogs from GGNRA.

**Representative Quote(s):** **Corr. ID:** 183945 **Organization:** *Not Specified*  
**Comment ID:** 30974 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** I would like to see the GGNRA be dog free. Banning dogs from the area would enhance wildlife and improve the experience for users of the park. If this solution is not practical I would urge a leash law be enforced in the entire park. No exceptions. Unfortunately voice control rarely works and results in dogs running free to harass people and wildlife. A strict leash law with enforcement is the only practical solution short of banning dogs from the GGNRA.

**Concern ID:** 12395  
**CONCERN STATEMENT:** Commenters suggested that alternatives consider people that are scared of dogs.

**Representative Quote(s):** **Corr. ID:** 185007 **Organization:** *Not Specified*  
**Comment ID:** 31904 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Some people are deathly afraid of dogs. Seeing one with no leash literally makes their hearts race in fear. It doesn't matter how gentle your animal is, they are still terrified. Frankly, you can never make these people like your dog. But keeping it under visible control with a leash will help them tolerate its presence. (Be seen with your dog off leash and you can count on these types to circulate petitions and call police at your slightest misstep.)

### **AL5000 - Alternatives: 1979 Pet Policy**

**Concern ID:** 12397  
**CONCERN STATEMENT:** Commenters suggested the GGNRA continue the use of the 1979 Pet Policy.

**Representative Quote(s):** **Corr. ID:** 184997 **Organization:** *Not Specified*  
**Comment ID:** 30875 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** I would just like to let make my request for off leash areas to exercise my dogs as it was originally written in the 1979 Pet Policy. The 1979 Pet Policy allows for historical use of off-leash recreation in just 1% of the GGNRA lands. So we're not asking to take over, just to maintain the original use of our few areas where it has worked in balance with the park's resources and without significant conflict with other park users, for decades.

**Corr. ID:** 185003 **Organization:** *Not Specified*  
**Comment ID:** 31938 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** If the Park Service does proceed with an expensive and unnecessary EIS process, I urge you to restrict its scope to the 1979 "voice-control"

policy only. As the Court noted, the 1979 policy is longstanding and well-established. The evidence is that it has worked well, and continues to work well. In seeking to restrict dogs to leash, cage or closure control, certain interveners are seeking to impose an expensive and unnecessary new enforcement regime on the Park Service.

**Corr. ID:** 185081      **Organization:** *Not Specified*

**Comment ID:** 31446      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The EIS assessment should include all areas that were off leash according to the 1979 Pet Policy when it considers its alternatives. In the 1979 Pet Policy, dogs were allowed off leash on 1% of GGNRA land, including Fort Funston, Ocean Beach, and Crissy Field. It was developed after the GGNRA determined that there would be no adverse impact on the environment or on other park users if off leash dogs were allowed in that 1% of GGNRA land.

**Corr. ID:** 185088      **Organization:** *Not Specified*

**Comment ID:** 31370      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to see ALL areas included in the 1979 Pet Policy -- which came about as a result of extensive public hearings -- included in the dialogue during Negotiated Rulemaking, there being no reason to exclude any areas wholesale at the outset. Each area should be given appropriate scrutiny before determination as to whether it is or is not an appropriate area for off-leash recreation. The Pet Policy allowed off-leash recreation on roughly 1% of the GGNRA's 76,000 acres. That is not an unreasonable amount of space to allot to one of the most popular recreational activities in our culture. The dog community is not asking for anything unreasonable.

**Corr. ID:** 185458      **Organization:** *Not Specified*

**Comment ID:** 31027      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please allow off leash dog walking to continue in designated areas of the Golden Gate Recreation Area (GGNRA), most especially Crissy Field/Beach. Areas for off leash dog walking are described in the July 8, 1996 compendium developed, after careful study, by Superintendent Brian O'Neil. The total area designated for off leash dog walking in the compendium is less than 1/2 of one percent of the 75,000 acres in the GGNRA. The Park Service has over twenty-eight years of data to support the position already taken by its Superintendent. An on leash requirement would contradict promises made in 1979 and 1996 by the Park Service for the continuation off leash dog walking in specified areas of the GGNRA.

Off leash dog walking was one of the continuing use recreations contemplated when the Golden Gate National Recreation Area (GGNRA) was formed in 1972. The GGNRA's February 24, 1979 "Pet Policy" was formalized in the Compendium signed by Brian O'Neil on July 8, 1996.

The recreational value of the Golden Gate National Recreation Area was of the utmost importance to Congress when it established this great urban park. In its words, the GGNRA was to be a "new national urban recreation area that will concentrate on serving the outdoor recreation needs of the people of the metropolitan region." Its objective was not to restrict but, "to expand to the maximum extent possible the outdoor recreation opportunities available in this region."

**Concern ID:**

12398

**CONCERN STATEMENT:**

Commenters suggested that the GGNRA continues the use of the 1979 Pet Policy with amendments.

**Representative Quote(s):**

**Corr. ID:** 183919      **Organization:** *Not Specified*

**Comment ID:** 31451      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I think that the 1979 development of a voice control dog walking policy and off-leash dogs should still remain in affect but limit the areas during high congestions seasons/times.

**AW1000 - Animal Welfare: Impact on/to dogs**

**Concern ID:** 12399

**CONCERN STATEMENT:** Commenters suggested that keeping dogs on leash is in the best interest of the dogs for a variety of reasons.

**Representative Quote(s):** **Corr. ID:** 185030      **Organization:** *Not Specified*

**Comment ID:** 31619      **Organization Type:** Unaffiliated Individual

**Representative Quote:** A common misperception is that dogs on-leash are more aggressive than dogs off-leash. This theory is drawn from the known fact that dogs that are tethered in place in yards or other areas become quite territorial and aggressive, in addition to the fact that tethered dogs are often neglected and lead miserable lives. However, the territorial instinct of dogs is not triggered by leashes; territorial instincts by definition apply to territory, not dog guardians. There is nothing about a leash that makes dogs aggressive. In fact, dogs that act aggressively on leash are generally improperly trained by their guardians, who accept aggressive behavior by their dogs rather than attempting to use positive reinforcement techniques to teach their dog how to interact with society while on a leash. The attached article by Trish King provides more information about this phenomenon. The letter provided to you in a previous e-mail in support of leash law enforcement from Dogs Deserve Better, an organization dedicated to prohibiting the tethering dogs, furthers this assessment.

**Corr. ID:** 185030      **Organization:** *Not Specified*

**Comment ID:** 31618      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Dogs can be injured in a variety of ways when off-leash. Physical injuries from falling off-cliffs, fighting with other dogs, and from running into traffic are obvious, but less obvious are the behavioral and psychological trauma that off-leash dogs can incur. As shown by the attached article by Trish King, behavioral specialist with the Marin Humane Society, off-leash dogs can engage in anti-social behavior in dog parks that can ultimately lead to bad and even dangerous behaviors when dogs are subsequently on-leash or outside of an off-leash play area. Dogs can learn bullying tactics or other inappropriate behaviors when relating to other dogs, and thus off-leash dogs can be behaviorally or psychologically damaged by inappropriate off-leash interactions. Unfortunately, as noted in the article by Trish King, too few dog owners are able to reliably tell the difference between rough play and inappropriate aggression or bullying, so these negative interactions are often commonplace in off-leash dog play areas. This is in part why the American Kennel Club has an active campaign in support of leash laws, and requires guardians of dogs that pass the AKC's good citizen test to leash their dogs whenever they are outside of enclosed areas.

**Concern ID:** 12400

**CONCERN STATEMENT:** Commenters suggested that keeping dogs on leash is not in the best interest of the dogs for a variety of reasons.

**Representative Quote(s):** **Corr. ID:** 184859      **Organization:** The Pooch Coach

**Comment ID:** 31330      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As a professional dog behaviorist, as well as a dog owner, I understand the importance of socialization and play for dogs. They need this type of interaction to keep them healthy and socialized. Without it, we see problems such as

leash-aggression (dogs trying to "attack" other dogs while on leash), due the frustration of not being able to interact properly.

**Corr. ID:** 185452      **Organization:** *Not Specified*

**Comment ID:** 32007      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 38. Dogs provide valuable services to people. They are pack animals and need to socialize with other members of their species. Many problems with dogs have resulted from lack of socialization. Dogs need the opportunity to play off-leash and should be allowed access to the water. We should consider the beneficial psychological effects of observing dogs that play.

**Concern ID:** 12401

**CONCERN STATEMENT:** Commenters suggested that allowing dogs to be off-leash is in the best interest of the dogs for a variety of reasons.

**Representative Quote(s):** **Corr. ID:** 184936      **Organization:** Dog Adventures

**Comment ID:** 30746      **Organization Type:** Recreational Groups

**Representative Quote:** I'd really like to encourage you to keep as many places off-leash accessible as possible. As a dog walker and dog lover, I see the benefit to our pets' health from being able to walk off leash - they are able to play with one another in ways a human simply cannot compare, and their social interaction with other dogs and humans is very much enhanced by being off-leash.

**Concern ID:** 12403

**CONCERN STATEMENT:** Commenters suggested that allowing dogs to be off-leash is not in the best interest of the dogs for a variety of reasons.

**Representative Quote(s):** **Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31537      **Organization Type:** Conservation/Preservation

**Representative Quote:** At Crissy Field, and for that matter, throughout most of the GGNRA the landscape is so large and topography so varied that it is not possible to consistently monitor a dog's off-leash behavior, and has resulted in numerous lost dogs, dog fights, and bites. (For example, on September 1, 2004, a Bull Terrier was lost at the South end of Baker Beach. See ex. 83; on November 16, 2004, a woman was cited for walking at least four off-leash dogs simultaneously at Fort Funston, one of which had previously bitten another dog at the park. See ex. 84. Additional examples are cited below. ) In some portions of the park dogs have even been preyed upon by wild coyotes. See ex. 82.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31539      **Organization Type:** Conservation/Preservation

**Representative Quote:** Off-leash dogs have been injured and killed at the GGNRA falling off steep cliffs. The GGNRA contains several scenic properties with towering, wind-swept cliffs that descend steeply to the ocean below. These cliffs are one of the visual splendors of the park, and were mentioned by Congress on numerous occasions when the GGNRA was established. See, e.g., 1972 U.S.C.C.A.N. 4850, 4852. However, in many places these cliffs are also quite dangerous: their steep windward sides are often hidden from visitors approaching from the leeward side until the last possible moment. Numerous signs warning visitors to stay well away from cliff's edge are thus posted throughout the GGNRA.

However, dogs of course do not derive any benefit from these postings, and numerous visitors have watched in horror as their off-leash dog was injured or killed after bounding off the edge of a cliff. Indeed, on January 15, 2005, a park visitor was

recreating near the cliffs at Mori Point (Mori Point is a relatively recent acquisition to the GGNRA located in Pacifica, CA that links the adjacent National Park lands of Sweeny Ridge and Milagra Ridge. Mori Point is clearly posted with signs explaining that pets must be leashed. See ex. 86. ) with his 1 ½ year old mixed-breed dog. The dog was not wearing a leash. At approximately 2:00 p.m., the dog "ran off" the cliffs at Mori Point, falling nearly 200 feet to the beach below. Although Park Rangers initiated a rescue investigation almost immediately, it took rescuers nearly an hour to locate the dog. At the time it appeared that the dog was in "bad shape but still alive." Unfortunately, by the time the dog was secured for transport and reached the top of the cliffs, "the dog was not moving and appeared to be lifeless." See ex. 86.

Sadly this is not an isolated event at the GGNRA. In the year 2000 alone the GGNRA rescued 15 dogs along with two dog owners who attempted to rescue their dogs but became stranded themselves from the cliffs at Fort Funston, a popular but extremely dangerous place for some park visitors to flout the National Park Service's leash law. See ex. 26. At least two of these dogs were injured, as were two Park Rangers, during the rescue attempts. Id.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31541      **Organization Type:** Conservation/Preservation

**Representative Quote:** Off-leash dogs pose a particularly acute risk to small dogs, which may be victimized by "predatory drift." Because dogs have descended from wolves, they contain an innate instinct to hunt. Generally this instinct is expressed in benign activities such as chasing balls, retrieving sticks, or playing Frisbee. However, evidence is emerging that dogs can have more visceral predatory instincts triggered by other, smaller dogs, particularly when the smaller dog panics or appears injured. This phenomenon is referred to as "predatory drift" because an otherwise well-behaved and obedient dog "drifts" into a predatory mode. According to the San Francisco SPCA, "predatory drift frequently results in serious injury or death" to the smaller prey-dog, because a bite inflicted during predatory drift incidents "is a much more serious kind of bite" than would normally occur in a regular dog fight. See ex. 95. The risk of a predatory drift event is so great that the San Francisco SPCA refuses to allow people to adopt dogs if they currently own a dog that is either less than half the size or twice the size of the new dog they wish to adopt. Id. When dogs are allowed to roam off-leash, the consequences of predatory drift incidents become particularly dire. Without a leash or other physical restraint on the dog, it can become difficult or impossible to prevent the larger dog from attacking and killing the smaller dog. Small dogs are thus particularly vulnerable to people who walk their dogs off-leash, and thus at this time, with off-leash dogs roaming freely at the GGNRA, it is particularly risky to take a small dog to the park, even on-leash.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31535      **Organization Type:** Conservation/Preservation

**Representative Quote:** Running dogs off-leash at the GGNRA puts the welfare of dogs at great risk. Like driving without a seatbelt, walking a dog off-leash is an activity that is inherently risky. While the general public is well attuned to the risks an off-leash dog poses to children, the elderly, and wildlife, few people understand that the greatest risk is often borne by the dog itself. At the GGNRA, this has been particularly true: literally hundreds of off-leash dogs have been lost, injured, or killed while roaming the park off-leash. (This is likely an underestimate of the actual number of dogs harmed by off-leash dog walking since the inception of the GGNRA. This estimate is based solely on incidents that have been reported to the Park Service and subsequently published in an incident report. An unknown number of altercations are never reported to the Park Service; similarly an unknown number of reported altercations are not recorded in incident reports. Thus, it is likely that the actual number of off-leash dogs injured at the GGNRA is substantially higher than the conservative numbers used for the purposes of this petition. )

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity  
**Comment ID:** 31536      **Organization Type:** Conservation/Preservation

**Representative Quote:** The threats facing off-leash dogs in the GGNRA are numerous. High-speed automobile traffic along the Great Highway and Skyline Boulevard borders the park at Ocean Beach and Fort Funston-both of which are places where the National Park Service's leash law is consistently ignored' and dogs have ran into traffic, been struck by cars, and killed while walking in the park off-leash. (For example, on August 13, 2004, a dog was seen in the middle of Skyline Boulevard, causing traffic to swerve out of the way at speeds near 50 miles an hour. See ex. 78. The dog had escaped from its owner after being walked at Fort Funston, apparently without a leash. Id. (noting that no leash was found in the dog owner's possession). Remarkably the dog was returned to its owner unharmed. However, a German Shepard/Standard Poodle mixed-breed dog was not so lucky. After being walked at Fort Funston, the dog was startled by a loud noise and ran away from its handlers. A few days later the dog was found dead on the side of the road, struck and killed by automobile traffic. Another off-leash dog owned by a Presidio YMCA member was hit by a park ranger driving an official vehicle. Ex. 72. )

High, crumbling cliffs at Fort Funston and Mori Point pose a danger to off-leash dogs, and several dogs have fallen off of, or become trapped upon, the sides of these cliffs, requiring rescue. (For example, On December 11, 2004, Park Rangers rescued an off-leash dog that fell off the cliffs at Fort Funston, see ex. 79; on September 26, 2004, an off-leash Doberman Pinscher was rescued from the cliffs at Fort Funston, along with the dog's owner, see ex. 80; and on October 11, 2004, a yellow Labrador Retriever ran off the cliffs at Fort Funston chasing a ball, requiring another rescue attempt. See ex. 81.

**Corr. ID:** 187693      **Organization:** American Humane Association  
**Comment ID:** 31607      **Organization Type:** Non-Governmental

**Representative Quote:** A companion animal is susceptible to a number of diseases including rabies and bubonic plague and parasites that can be carried by wild animals. Many of these diseases can be a threat to human health as well. A person has no way of keeping their unrestrained dog from chasing wildlife, consuming the remains of wild animals, or coming in contact with fecal matter, all potential vectors of contagions.

Additionally, the majority of dogs will chase any species of wildlife if given the opportunity, regardless of whether they are hungry or aggressive, or if they've been bred or trained for hunting. Without being able to physically restrain their dogs, owners have no way of preventing injury or death to their pets when their animals are free to interact with wild animals or race across dangerous terrain.

### ***CC2000 - Consultation and Coordination: Reg-Neg process***

**Concern ID:** 12405  
**CONCERN STATEMENT:** Commenters do not believe that the negotiated rulemaking committee fairly represents all interested parties.

**Representative Quote(s):**

**Corr. ID:** 185106      **Organization:** *Not Specified*

**Comment ID:** 31175      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Furthermore, I find it outrageous that some members of the Negotiated Rulemaking committee have been allowed to remain on the committee despite their blatant attempts to circumvent the Negotiated Rulemaking by submitting "Emergency" petitions to ban off-leash dogs. Several pro-dog advocates (such as members of the Ocean Beach DOG group) were not allowed to sit on the committee because of their alleged attempts to circumvent the NR process, so it seems only fair to dismiss the anti-dog committee members who are guilty of the same alleged offense

**Corr. ID:** 185452      **Organization:** *Not Specified*

**Comment ID:** 32024      **Organization Type:** Unaffiliated Individual

**Representative Quote:**

93. The average, everyday park-goer is not represented on the Committee.

94. There needs to be a "no dogs at all" representative on the Committee.

95. Dogs are not the problem; not even a small part of it. Dog owners are more likely than not to be and act as stewards as opposed to destroyers.

96. The Reg-Neg process is setting up the public with more of the same.

97. The Reg-Neg process is all about dog walkers and how much they can get away with.

98. The Reg-Neg process is not about walking dogs, its about dogs that are so uncontrolled that they control the public.

**Concern ID:**

12406

**CONCERN STATEMENT:**

Commenter feels that the terminology used in the negotiated rulemaking process must accurately reflect all forms of recreation, not merely dog walking.

**Representative Quote(s):**

**Corr. ID:** 185219      **Organization:** *Not Specified*

**Comment ID:** 31477      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Regarding the scoping process ' There is a huge semantic difference between "off-leash dog walking" and "off-leash recreation," and by implication a huge management difference as well A "dog play area" or "off-leash recreation area" is very different from a "dog walking area."

The term "dog walking" as the term employed to discuss a management plan is inappropriate, as well as the use of images depicting only "walking" as shown in the brochure on public scoping workshops. Use of the term "dog walking" limits the scope and perspective of activities involving dogs and their people. This is part of the problem. Off-leash recreation is most definitely NOT about walking. It's about the most basic form of physical activity you can enjoy with your dog - being able to throw a ball or stick or frisbee for your dog to chase, which may involve running, jumping, swimming, and other forms of playing and exercise, but definitely not walking. More organized activities like dog sports (flyball, agility) also involve very little walking. Nor can any of these activities be done on-leash, and only a few can be accommodated in tiny fenced-off areas called "dog parks."

Thus the euphemism "dog walking" is prejudicial and by definition limits the scope of activity under discussion. It suggests that the only form of activity under discussion is walking. Dog walking of course remains an extremely important form of recreation, but the scope of the NR process should be open to other forms of human-dog recreation.

I feel it is important that the terminology used in the NR process will accurately reflect the variety of forms of recreation under discussion. I realize that the English language has not yet generated convenient names for this activity, but even simply adding

"recreation" would be less prejudicial and broader in scope.

**Concern ID:** 12514  
**CONCERN STATEMENT:** Commenters asserted that the negotiated rulemaking process is not in accordance with the law.

**Representative Quote(s):** **Corr. ID:** 185117 **Organization:** Ocean Beach DOG

**Comment ID:** 31341 **Organization Type:** Recreation

**Representative Quote:** I think I have made it clear in the OBDog document requesting Administrative Review of the Negotiated Rulemaking process that I do not believe this current NR or its EIR/EIS process is in compliance with the current law. I am making a formal request to have a copy of the Request for Administrative Review of NR be delivered to the environmental consultants who will be doing the actual EIS/EIS.

**GA1000 - Impact Analysis: Impact Analyses**

**Concern ID:** 12408  
**CONCERN STATEMENT:** Commenters believe the EIS needs to address impacts to the local economy, native wildlife and plant species, human health and safety, topography, soils, and vegetation.

**Representative Quote(s):** **Corr. ID:** 184844 **Organization:** Not Specified

**Comment ID:** 30855 **Organization Type:** Unaffiliated Individual

**Representative Quote:** This document needs to analyze the impacts of off-leash dog use in GGNRA on:

- 1) wildlife and native plants
- 2) general topography (e.g., can off-leash dog use increase erosion?)
- 3) human use--
  - a. are people in general less likely to use the Park because there are off-leash dogs?
  - b. are families with small children less likely to use the park because there are off-leash dogs?
  - c. Would extensive off-leash dog use in certain areas create exclusionary zones which are used only, or predominantly, by off-leash dog use? As an example please consider Point Isabel in The East Bay Regional Park District which is a park specifically allocated for off-leash dog use. It is predominantly used by people with off-leash dogs, although it has great shoreline views that would otherwise attract many other people. It would also be a good reference in determining impacts of off-leash dogs on wildlife and avian use of an off-leash dog area.
- 4) How effective is "voice-control" in controlling dogs?  
 For example, if a child comes up to a dog under voice control and moves abruptly can one be assured that a voice controlled dog will not respond aggressively and potentially injure the child? This needs to be compared to a similar situation with the dog on a leash. Variables in this situation are: 1) how aware of the situation is the dog owner when the dog is subject to voice control or is on leash, 2) How effectively can a dog owner respond when the dog is on leash or subject only to voice control? The same type of analysis should be applied to a situation when a dog is exposed to either a small or large mammal or ground nesting or ground foraging bird.

**Corr. ID:** 184931 **Organization:** Not Specified

**Comment ID:** 30988 **Organization Type:** Unaffiliated Individual

**Representative Quote:** It is crucial that the Dog Management Plan and the EIS include each of the following points:  
 -Acknowledge the importance of the GGNRA as a migratory bird corridor in the Pacific Flyway.

-Analyze carefully past, present and future impacts of dogs to wildlife and habitat in the GGNRA.

-Establish measures to protect and preserve wildlife and habitat for future generations to enjoy. In particular, the National Park Service must maximize protections for special-status species such as the Bank Swallow, Western Snowy Plover, Northern Spotted Owl and Brown Pelican.

**Corr. ID:** 185085      **Organization:** CalDOG

**Comment ID:** 31923      **Organization Type:** Recreational Groups

**Representative Quote:** The environmental study to the extent it addresses endangered species must objectively and transparently describe the specific data relied upon for the site and the recommendation. The environmental study should make certain that if a particular action is recommended that it is clear whether the action is intended to encourage opportunities for an endangered species (e.g. build it they will come) as opposed to taking steps to protect an existing identifiable and quantifiable population of the protected species.

**Corr. ID:** 184967      **Organization:** *Not Specified*

**Comment ID:** 31990      **Organization Type:** Unaffiliated Individual

**Representative Quote:** My review of hundreds of pages of GGNRA dog management documents failed to locate a single document regarding risk assessment or the management of the public health menace of off-leash dogs. In any other NPS unit in the county, NPS staff would have long ago responded to the menace. GGNRA staff has totally sacrificed their professional integrity to appease a thuggish minority of GGNRA users.

**Concern ID:**  
**CONCERN**  
**STATEMENT:**

12410

Commenters believe the EIS should address the social, cultural, and economic benefits to the community of permitting off-leash dog walking at GGRNA, and the impacts of prohibiting off leash dog walking in GGNRA.

**Representative**  
**Quote(s):**

**Corr. ID:** 184854      **Organization:** *Not Specified*

**Comment ID:** 31909      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Banning or further limiting off leash dogs will have a significant negative impact on the community. The community of people recreating with off leash dogs represents a tremendous cultural resource in San Francisco and the GGNRA. Where else can you see people from nearly every ethnic background and race, all socio-economic levels, seniors, teens, families with kids, singles, gays, straights, men, women, disabled, and able-bodied all getting together to socialize together while their dogs play off leash. Walking and playing with off leash dogs brings together (in a positive way) people who otherwise would rarely see or interact with one another.

**Corr. ID:** 184854      **Organization:** *Not Specified*

**Comment ID:** 31910      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Consider the economic and health aspects of providing off leash recreation: The community of dog owners contributes significantly to the local economy - contributing over \$25 million in sales tax alone to the city coffers in San Francisco every year. Dogs provide much-needed companionship to seniors, singles, children, and the sick and disabled, and encourage people who would otherwise stay housebound to get out of the house at least once a day.

**Corr. ID:** 185085      **Organization:** CalDOG

**Comment ID:** 31920      **Organization Type:** Recreational Groups

**Representative Quote:** -The environmental study must measure objectively the benefits to the cultural resources of the GGNRA the social community created by regular urban visitors that share voice command dog recreation.  
-The environmental study must measure objectively the benefits to the cultural resources of the GGNRA of visitors participating in the shared voice command dog recreation.  
-The environmental study must measure the current size of voice command recreation areas and the benefits of dispersed recreation within the GGNRA including dispersed voice command dog recreation.  
-The environmental study must measure the benefits to the cultural resources of the GGNRA of having families from all economic backgrounds able to share voice command dog recreation.

**Corr. ID:** 185456      **Organization:** *Not Specified*

**Comment ID:** 31197      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 3. Please consider if limiting available recreational space by building fences and plantings such as uneven bunch grasses, concentrate visitors into smaller areas thereby causing conflicts between visitors and increasing the impacts of visitor traffic on available areas. In other words, did the GGNRA create conflicts by concentrating activity? Is there any history of conflict prior to the GGNRA that would help to answer this question? A related question is whether or not increasing available off-leash areas could reduce impacts by dispersing the impact over larger areas. At Fort Funston, for example, the number of visitors increased substantially after off-leash recreation was prohibited at Ocean Beach. The impact of off-leash recreation was only visible at Fort Funston after the closures at Ocean Beach, a choice made by the GGNRA, not dog owners.

4. Please consider the impact of prohibiting off-leash recreation on the surrounding communities. In San Francisco, for example, thousands of dogs and their owners would be forced to use our city parks for off-leash recreation. There are already an insufficient number of off-leash areas in the city parks for the number of dog owners who wish to use them and they are therefore often damaged by heavy usage. The city's Recreation and Park Department's Natural Areas Program reports in their management plan that 80% of official off-leash areas are either in or adjacent to designated "natural areas" with "sensitive habitat." What would the impact be of funneling all off-leash recreation to the city parks? Doesn't the GGNRA have an obligation to protect and conserve the environment of the communities in which it exists as well as the properties that it "owns" on behalf of the public? If the habitat in city parks is more rare and fragile than the artificial habitat that has been created by the GGNRA, shouldn't the GGNRA participate in its protection by providing off-leash recreational areas that are an alternative to those in city parks? Since the GGNRA doesn't have the option of prohibiting off-leash recreation outside its jurisdiction, it is not in a position to protect rare and sensitive habitat on city owned properties by extending such a ban to those properties.

**Corr. ID:** 185456      **Organization:** *Not Specified*

**Comment ID:** 31201      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 5. Please consider the increase in driving that would be required if all dog owners were required to drive further away from their homes in search of an opportunity to walk their dog off-leash. What will the environmental impact be of increased driving by the thousands of dog owners throughout the Bay Area who are presently using GGNRA lands to walk with their companions? Please extend your literature search to confirm the commitment that dog owners make to their companions. In other words, dog owners will drive or move as far as it takes to take care of their pets, as they believe they deserve. Banning off-leash recreation merely moves that activity to other locations.

6. Please compare the impact of off-leash dogs to other park usage. Do dogs do more damage than humans or horses, or any other recreational use? Since on-leash dogs are

as likely to urinate as off-leash dogs, how can off-leash dogs do more damage than on-leash dogs?

7. Please consider the cost of enforcement of prohibitions against off-leash recreation in the GGNRA and the opportunity cost of resources used for enforcement. Take into consideration that San Francisco has been trying for about 5 years to limit off-leash recreation to about 20 legal off-leash areas, with little success. San Francisco does not have the resources to increase the enforcement effort substantially. Many dog owners are committed to walking their dogs regardless of the regulations. What will it cost the GGNRA to enforce off-leash prohibitions and can this money benefit the environment more if used another way? For example, if enforcement funding were used to restore areas in which there is no off-leash activity, would this benefit the environment more than the cost of enforcement?

**Corr. ID:** 185456      **Organization:** *Not Specified*

**Comment ID:** 31205      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 8. Please consider the GGNRA's special obligations in an urban environment. Making the urban environment more comfortable for urban dwellers helps to prevent suburban development that destroys habitat. Are urban dwellers more likely to leave the city for less densely populated areas if they are unable to use their urban parks as they wish? If so, is the GGNRA thereby doing more damage to the environment by limiting the use of urban parks?

9. Please include other EIR's for off-leash areas in the Bay Area and elsewhere in your literature search. For example, several new off-leash areas have been created in San Francisco in the past few years. Negative declarations were issued for all of these new off-leash areas. Off-leash areas in Berkeley (Cesar Chavez) and in Richmond (Point Isabel, a State Park) were either created recently or were reviewed when the State acquired Point Isabel. EIR's were done for these dog parks. Since both of these parks are on the shoreline, they are similar to the GGNRA lands in San Francisco. If negative declarations or mitigated negative declarations were made for these EIR's, they should be considered a precedent for the similar conditions in GGNRA lands in San Francisco.

**Concern ID:**  
**CONCERN**  
**STATEMENT:**

12411  
[Commenters want the EIS to recognize GGNRA as an urban park in evaluating impacts.](#)

**Representative**  
**Quote(s):**

**Corr. ID:** 185443      **Organization:** *Not Specified*

**Comment ID:** 31041      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Any restrictions on off-leash dog walking due to concerns about wildlife habitat must be supported by scientific data, and should acknowledge the fact that these areas are located in a densely populated, built environment. Base line studies should be established to provide factual evidence. Consideration of the fact that off-leash dog walking has been an acceptable practice for a long period of time must also be recognized as established public policy.

**Corr. ID:** 185456      **Organization:** *Not Specified*

**Comment ID:** 31195      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 1. Please make a distinction between artificially created and naturally occurring environments when evaluating the impact of dogs on GGNRA lands. The GGNRA has created many artificial environments in San Francisco since the creation of the GGNRA. Areas such as Fort Funston and Crissy Field were almost entirely altered by man prior to the creation of the GGNRA and were traditionally used for off-leash recreation. The GGNRA elected to remove existing non-native vegetation, such as ice plant, in order to plant native plants, thereby establishing their claim that dogs are harming fragile, rare vegetation. Do the National Park Service's

conservation duties apply equally to the artificial environments that it chose to create?  
Related questions are:

-Do the native plants actually "belong" in these locations (in the sense that they are not adapted to the locations in which they have been planted either because they had not occurred there naturally or because the conditions have been substantially altered) and therefore can they survive in the long run, even without recreational use by dogs or humans?

-Are the native plants capable of stabilizing sand and if not, what if any harm can be done to the surrounding urban environment, such as burying roads in sand?

2. Please consider if some of the native vegetation that has been introduced by the GGNRA actually requires more resource inputs than the non-native vegetation it replaces and therefore does more harm to the environment than the vegetation it replaces. For example, the grass meadow at Crissy Field has been replaced with native bunch grasses, which require more water to maintain a year-round green appearance than its non-native predecessor (which is what is being done presently). The native bunch grass is also difficult to walk on because it is uneven, thereby limiting available recreational space and creating unsafe walking conditions, particularly for visitors with limited mobility. A related question is whether or not herbicides are being used to control non-native vegetation in areas where dogs have been banned and if so, whether such use does more harm to the environment than the presence of dogs? Is dog urine more harmful than herbicides? Your literature search should include a recently published study about the harmful effect of herbicides on frog populations.

### **GA3000 - Impact Analysis: General Methodology For Establishing Impacts/Effects**

**Concern ID:** 12412

**CONCERN STATEMENT:** Commenters suggest using objective site specific scientific data to evaluate impacts.

**Representative Quote(s):** **Corr. ID:** 185198      **Organization:** Not Specified

**Comment ID:** 30806      **Organization Type:** Unaffiliated Individual

**Representative Quote:** -NPS needs to use scientific data (not just literature searches) as part of their decision making process in determining where sensitive habitats and/or endangered species are located within the GGNRA. The EIS needs to clearly state what assumptions are for these habitats. The alternatives should consider options for the use of seasonal restrictions, versus year round restrictions, for some areas. If there are perceived increase conflicts surrounding off leash dog walking, the NPS should be able to identify and quantify these conflicts.

-Identify all areas within the GGNRA where people currently walk dogs off leash (both legally and illegally). This should be considered the basis for no change and should be one of the alternatives studied in the EIS, even if this activity is not part of the 1979 Pet Policy. Examples include Mori Point, Milagra and Sweeny Ridges in San Mateo and East Ft. Baker in Marin.

-The EIS needs to include Presidio Area B lands within the project study area.

-The NPS should study scientific evidence of impacts by off leash dog users as compared to other NPS user groups, including recreational users. Identify and consider cumulative impacts of these users groups and options for reducing impacts, including changes to current land use designations.

-The NPS should study the value of dispersing recreational uses and activities across park areas and resources, including off leash recreation.

-Provide the scientific data to establish wildlife protection/wildlife sanctuary areas within the GGNRA.

**Corr. ID:** 185268      **Organization:** Not Specified

**Comment ID:** 31269 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The GGNRA data gathering and recording procedures both in the past and present are limited with respect to the documenting, recording and data retrieval of dog management problems or incidents. As such, it is currently not possible to quantify with reasonable accuracy any dog management problems or incidents.

There exists no substantial, reliable GGNRA data to support claims of significantly worse problems associated with dogs in GGNRA, including Crissy Field and Fort Mason, vs. claims of any other kind of problem.

450 SUTTER STREET SUITE 2336 SAN FRANCISCO 94108 415.986.4664 FAX 415.986.1798 www.perioaccess.com

There are complaints emailed and telephoned in to GGNRA regarding dogs, but these communications have not been systematically input for data analysis. As such, they have not been quantitatively compared to other emailed and telephoned complaints such as those regarding bicyclists and pedestrians. Further, no mechanism exists that allows GGNRA to determine the source of these calls (e.g., individuals vs. special interest groups). I understand that GGNRA does not consider the phone calls and e-mails as objective and valid data.

Going forward, the existing GGNRA data gathering and recording methods could be updated to provide more detailed data. This would allow the issue of dog harm to humans and harm to habitat to be critically appraised in a scientifically valid and objective prospective study.

Existing data regarding dog management problems in GGNRA are lacking, subjective and readily at risk of interpretive bias.

Although hard data is definitely lacking, Ms. Ruan indicated that the GGNRA Law Enforcement Division has "a pretty good feeling and sense" of the significance of the day-to-day problems. I asked her the following question: "With respect to harm to humans and harm to the environment/habitat, which is at greater cause: bicyclists or dogs?" Ms. Ruan informed me that in her experience, bicyclists not dogs are the greatest cause of harm to humans and the habitat in the GGNRA.

**Corr. ID:** 185421 **Organization:** Crissy Field Dog Group

**Comment ID:** 32031 **Organization Type:** Recreational Groups

**Representative Quote:** 13) Identify all areas within the GGNRA where people currently walk dogs off leash (both legally and illegally). This should be considered the basis for no change and should be one of the alternatives studied in the EIS, even if this activity is not part of the 1979 Pet Policy. Examples include Mori Point, Milagra and Sweeny Ridges in San Mateo and East Ft. Baker in Marin.

### ***LP1000 - Laws and Policies: Impact of GGNRA actions on other NPS units' enforcement of servicewide policies and regulations***

**Concern ID:** 12414

**CONCERN STATEMENT:** Commenters want NPS to consider the impact of GGNRA actions on NPS' enforcement of servicewide policies and regulations in other park units.

**Corr. ID:** 185057 **Organization:** Center for Biological Diversity

**Comment ID:** 31559 **Organization Type:** Conservation/Preservation

**Representative Quote:** These impacts must be assessed as well, including the radical departure from national park policy being considered by the GGNRA and how the park intends to justify this departure, including how the park will justify the confusion

and impacts such a policy may place on other units of the national park system.

**Corr. ID:** 185222      **Organization:** National Parks Conservation Association

**Comment ID:** 32046      **Organization Type:** Conservation/Preservation

**Representative Quote:** Federal regulations require dogs to be leashed or otherwise physically restrained in the National Park System. Despite that, GGNRA is the only unit of the National Park System known not to enforce leash laws throughout the park. Leash laws provide important safeguards for people, our pets, wildlife, and our parks, and the National Park System's leash law has effectively protected every other unit within the system- while providing responsible access for dogs and owners- for decades.

**Corr. ID:** 185445      **Organization:** *Not Specified*

**Comment ID:** 31959      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The peculiar history of dog-walking in San Francisco should not set the precedent for other National Parks which do not have such a history.

### ***LU1000 - Land Use: Policies and Historical Use***

**Concern ID:** 12415

**CONCERN STATEMENT:** Commenters request GGNRA recognize the historic use of the land prior to acquisition by NPS.

**Representative Quote(s):**

**Corr. ID:** 185433      **Organization:** *Not Specified*

**Comment ID:** 30995      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As its name implies, the Golden Gate National Recreation Area (GGNRA) was created for, and its mission includes, the maintenance and furtherance of recreation in one of the most heavily populated areas in the country. The Enabling Statutes establishing the GGRNA state clearly it is intended as an urban recreational area. This was a smart and prescient move, particularly as we belatedly recognize the profound value of multiple and varied forms of exercise for the health and welfare of children, families and seniors alike.

Walking with a dog off-leash is and has been an intrinsic part of recreation in the GGNRA. People were walking their dogs off-leash in Fort Funston, Crissy Field, Ocean Beach, Baker Beach and at numerous other sites along the coast for decades before Mayor Alioto approved the transfer of this land to the Federal Government.

The GGNRA management recognized and responded to the importance of this form of recreation with its promulgation of the 1979 Pet Policy, a policy which was created with community input following extensive discussion.

There is no "confusion" concerning the status or importance of dog-walking in the GGNRA, except insofar as the GGNRA itself has sought unilaterally and arbitrarily to nullify its own properly effected policy. The arbitration and litigation which the GGNRA decries, is that which has sought to require the GGNRA to follow its own directives and obey the law. The Federal Court reaffirmed that the Pet Policy is lawful and remains in effect. Therefore, discussion of dog-walking in the GGNRA begins from that basic premise.

**Corr. ID:** 185452      **Organization:** *Not Specified*

**Comment ID:** 31996      **Organization Type:** Unaffiliated Individual

**Representative Quote:**

5. There is no history of off leash dog walking while Fort function was a military

installation.

6. Much of the lands of the park are former military land, dogs are not permitted of-leash in military installations.

7. Former military is the key word here-the public was generally not allowed to recreate on a military base either.

8. One of the park's purposes is to preserve history, 200+ years of military history cannot be ignored.

**Corr. ID:** 185452

**Organization:** *Not Specified*

**Comment ID:** 32023

**Organization Type:** Unaffiliated Individual

**Representative Quote:** 89. Not a question of "dog use" but of the maintenance of traditional recreation in the GGNRA. The bottom line is for the Federal Government to recognize its responsibilities and the promises it made to the people of the Bay Area to maintain recreation in the GGN Recreation Area and to stop treating off-leash recreation as a problem and see it as a healthy and valuable activity.

**Concern ID:**

12417

**CONCERN STATEMENT:**

Commenters state the importance of recognizing GGNRA as a national park that is subject to special protections similar to those in all other National Parks.

**Representative Quote(s):**

**Corr. ID:** 185024

**Organization:** *Not Specified*

**Comment ID:** 30845

**Organization Type:** Unaffiliated Individual

**Representative Quote:** The long-standing policies which have allowed the current situation to exist, where the law is flouted and dogs are free to discourage human visitors while they dig, destroy plants and terrorize the native animals, are a disgrace. This is not a neighborhood park. This a national park with special obligations to protect natural resources. The presence of unleashed dogs in our national parks is contrary to national parks policy and it needs to be stopped...The current situation with regard to dogs at the Golden Gate National Recreation Area is a disgrace. This is a national park. There are policies related to dogs in the parks that are as appropriate at GGNRA as they are in other jewels of the park system such as Yosemite and Glacier.

### ***LU2000 - Other Agencies Policies and mandates Regarding Dog Management***

**Concern ID:**

12418

**CONCERN STATEMENT:**

Commenters request that GGNRA consider the dog management policies and mandates in other state and local natural areas.

**Representative Quote(s):**

**Corr. ID:** 187678

**Organization:** *Not Specified*

**Comment ID:** 31587 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Golden Gate Park, Oak Woodlands (including Whisky Hill, Lily Pond, and Strawberry Hill) - This Natural Area is in the northeast corner of Golden Gate Park. The oak woodlands are one of the few places where a large stands of native trees persist within the Significant Natural Areas System. Red-legged frogs have been reported in the past but now invasive predators occupy the water. Creation of artificial habitat and vegetation management, planting of forage species, as well as predation control, should improve wildlife habitat. Keeping dogs on leash will reduce disturbance.

**Corr. ID:** 187678

**Organization:** *Not Specified*

**Comment ID:** 31592 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Interior Greenbelt -- 6.23

This Natural Area is made up of two disconnected parcels. There is an extensive urban

forest, populations of sensitive species, and suitable habitat for a variety of birds. There is a seasonal creek. The site is mostly blue gum forest. There is sweet cicely here that is one of only two known populations in the City. There is no MA-1 designation at this Natural Area. Dogs must be restricted from sensitive areas.

**LU3000 - Land Use: Dog Parks Provided by San Francisco and Other Municipalities**

**Concern ID:** 12419

**CONCERN STATEMENT:** Commenters request that GGNRA take into consideration the impact of dog parks outside park boundaries on wildlife and wildlife habitat.

**Representative Quote(s):** **Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31550      **Organization Type:** Conservation/Preservation

**Representative Quote:** National Parks such as the GGNRA cannot accomplish this purpose while simultaneously accommodating all forms of recreation enjoyed by the public without restriction. The National Park Service has thus recognized that the role of the National Park System is to "provide opportunities for forms of enjoyment that are uniquely suited and appropriate for the superlative natural and cultural resources found in the parks" and that the park service will "defer to local, state, and other . . . organizations to meet the broader spectrum of recreational needs and demands." 67 Fed. Reg. at 1427. In San Francisco, the GGNRA's reliance on the city of San Francisco to provide off-leash recreation opportunities is well founded. The City of San Francisco now contains approximately 27 designated off-leash areas throughout the city, and in 2002 the city adopted a final "Dog Policy" for expanding off-leash recreation into even more portions of the city. Available at [http://www.parks.sfgov.org/site/recpark\\_index.asp?id=2181](http://www.parks.sfgov.org/site/recpark_index.asp?id=2181)

**Corr. ID:** 187678      **Organization:** *Not Specified*

**Comment ID:** 31586      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Buena Vista Park -- 6.10  
This Natural Area contains one of the most extensive coast live oak forests within the city. The remainder of Buena Vista Park is almost exclusively mixed exotic forest. There is a designated dog play area. The oak forests provide potential nesting habitat for raptors that forage at Twin Peaks and Corona Heights. Five sensitive species are known to breed in this Natural Area, including red shouldered hawks and dark eyed juncos. Evaluate to make sure will not attract undesirable exotics and dogs into wildlife refugia.

**Corr. ID:** 187678      **Organization:** *Not Specified*

**Comment ID:** 31582      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Lake Merced  
One priority for this area is the remaining populations of resident and migratory birds. Free-roaming cats are common (6.1-9). Western pond turtles are present, one of the last populations in San Francisco. Red-legged frogs may have been historically present but surveys in 2000 failed to find any. Introduced predatory fish, turtles, and bullfrogs may be responsible. There are various unique habitats and plant species. There is a lightly used DPA, for which monitoring is proposed. One problem is that the existing Dog Play Area is on MA 1 and MA 2 lands. The proposal recommends monitoring as the only change, as the area is lightly used. More desirable would be shifting off-leash use to an MA-3 area. However, MA-3 areas are rather small at this site. We would recommend, however, that efforts be made to shift dog use to other areas, perhaps through improving dog opportunities and facilities at a more suitable site.

**Corr. ID:** 185452      **Organization:** *Not Specified*

**Comment ID:** 32017 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 77. There are 27 off-leash dog areas in San Francisco. There are more in SF per square mile than any other area in the U.S. The problem is that there aren't enough safe, non-exclusive areas in SF not that there aren't enough areas. We need to improve SF city areas.

**Concern ID:** 12420

**CONCERN STATEMENT:** Commenter states that the city of San Francisco provides ample off leash recreation areas therefore there is no need for off leash areas in the GGNRA.

**Representative Quote(s):** **Corr. ID:** 185030 **Organization:** Not Specified

**Comment ID:** 31620 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Also Attached is a partial spreadsheet showing how San Francisco compares in providing off-leash dog play areas to other major cities. As far as I am aware, San Francisco has the most off-leash dog play areas per square mile of any city in the United States. In addition, as I will provide in a subsequent e-mail, many citizens and scientists believe that San Francisco is doing an inadequate job of providing safe places in city parks to protect people, our pets, wildlife, and parks, making it much more critical that the GGNRA provide leash-only recreational opportunities that city, local, and county parks simply refuse to provide to the populous. There is simply no need for additional off-leash areas in San Francisco.

**Corr. ID:** 185030 **Organization:** Not Specified

**Comment ID:** 31616 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In addition, I include evidence that there is no need for off-leash dog access in San Francisco because San Francisco has more off-leash dog play areas per square mile than any other city in the United States reviewed.

#### **LU4000 - Land Use: San Francisco Significant Natural Resources Area Management Plan**

**Concern ID:** 12421

**CONCERN STATEMENT:** Commenters suggest GGNRA refer to the San Francisco Significant Natural Resources Area Management Plan for guidelines when developing their dog management plan.

**Representative Quote(s):** **Corr. ID:** 187678 **Organization:** Not Specified

**Comment ID:** 31574 **Organization Type:** Unaffiliated Individual

**Representative Quote:** A local study by a Berkeley senior in Environmental Sciences documents some of the interactions of off-leash dogs with wildlife in Berkeley (Abraham 1999). Anecdotal accounts suggest that restricting dogs is an effective way to increase bird use (Birds Australia, nd). Given the small size of the Natural Areas and populations of species of concern, it is most appropriate to enforce the existing leash regulations and to exclude dogs from some small but vital wildlife habitat as proposed in the Plan. The Plan makes the point that dogs and the wildlife and sensitive species of the Natural Areas can share the Natural Areas easily if owners keep their dogs under control. Areas where dogs are proposed to be excluded total less than 36 acres, and include the last remaining habitat in the Natural Areas supporting the federally endangered San Francisco Garter Snake, one of two habitats supporting federally endangered California red-legged frogs and sensitive species western pond turtle, and riparian habitat suitable for California quail. Altogether it is less than 17% of the terrestrial land area of the Natural Areas. Monitoring is proposed for around 10 more acres (5-11, 5-12). This is less than the 100 acres anticipated in the existing Dog Policy (5-10). Two of six existing Dog Play Areas will lose some area. The remainder of the proposals simply call for the enforcement of existing regulations. In

fact, the prioritization of Management Areas in the plan makes it easier to determine the appropriate location of new Dog Play Areas.

**ON1000 - Other NEPA Issues: General Comments**

**Concern ID:** 12423

**CONCERN STATEMENT:** Commenters state the NEPA planning process must involve participation of the Presidio Trust, including non-government personnel to ensure local interests are represented.

**Representative Quote(s):** **Corr. ID:** 185413      **Organization:** *Not Specified*

**Comment ID:** 31024      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The human element is not one to forget. So, I further believe that it is imperative to keep the Presidio Trust (made up of members of the public and not government personnel) involved both in the planning processes for acquiring more lands and in increasing the areas (numerically and in size) for off leash dog recreation. The Presidio Trust's involvement would apply throughout the GGNRA in general and the Presidio holdings particularly. This inclusion of non-government personnel could emphasize local input, and perhaps, interpret federally mandated advisories in a fashion compatible with those interests in "continued use" of the resident population.

**Concern ID:** 12424

**CONCERN STATEMENT:** Commenters feel that GGNRA must provide more notice to the public of opportunities for involvement in the planning process.

**Representative Quote(s):** **Corr. ID:** 185113      **Organization:** *Not Specified*

**Comment ID:** 31171      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I was very pleased to get the notices you sent in the mail about the meetings. However, I don't feel that these notices are enough to gather adequate or fair public opinion on this issue. The GGNRA simply really must provide comment forms and flyers that explain where and how to submit comments \_in the actual areas in question\_. On my walks in these areas and in speaking to people I come across there, the gross majority of the people currently using these areas for off-leash recreation are completely and utterly unaware of the NR process, and none of them knew anything about this particular comment period. These areas really must have flyers and comment forms available to the public onsite. In areas like Crissy Field, one cannot even leave flyers posted or the rangers remove them promptly. The public is simply unaware of this process and the comment periods/deadlines because you have failed to make this more clear to park users.

**Corr. ID:** 185421      **Organization:** Crissy Field Dog Group

**Comment ID:** 32028      **Organization Type:** Recreational Groups

**Representative Quote:** The EIS needs to include Presidio Area B within the project study area.

**ON1100 - Other NEPA Issues: Scope of planning process**

**Concern ID:** 12427

**CONCERN STATEMENT:** Commenters feel that keeping dogs out of GGNRA must be included in the scope of the planning process.

**Representative Quote(s):** **Corr. ID:** 185216      **Organization:** *Not Specified*

**Comment ID:** 29447 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Your proposed "Dog Management Plan" is fatally flawed because it does not even contemplate keeping dogs out of GGNRA. Dogs have no business in any national park area whether it is in an urban environment or wilderness area. The mission of the National Park Service is to protect our national park lands for future generations. Dogs are a menace to a healthy ecology, natural areas, native plants, wildlife, and to humans. I don't see anywhere in your brochure that you even contemplate keeping dogs out of this national park. Why should GGNRA be an exception to the rule in all other parklands that dogs are not allowed on any park trail? Is it because dog owners are the loudest group? There is no good reason why an exception should be made for GGNRA to allow dogs.

**Concern ID:**

12428

**CONCERN STATEMENT:**

Commenters requested specific information regarding the scope of the planning process, including information on how, where, and when impacts will be assessed and evaluated.

**Representative Quote(s):**

**Corr. ID:** 184909 **Organization:** *Not Specified*

**Comment ID:** 31325 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The Dog Management Plan and EIS:

- Must acknowledge the importance of the GGNRA as a migratory bird corridor in the Pacific Flyway.
- Must carefully analyze past, present and future impacts of dogs to wildlife and habitat in the GGNRA.
- Must establish measures to protect and preserve wildlife and habitat for future generations to enjoy.
- Must maximize protections for special-status species such as the Bank Swallow, Western Snowy Plover, Northern Spotted Owl and Brown Pelican.
- Must include specific details on how existing and new dog regulations within the GGNRA will be enforced.
- Must also include funding for enforcement.

**Corr. ID:** 185083 **Organization:** *Not Specified*

**Comment ID:** 31340 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In regards to the upcoming evaluation, I have some concerns, namely the following:

- what science/ecological impacts will be considered as part of EIS review?
- how will the contractors evaluate off leash dog impacts versus other recreational and animal impacts in the GGNRA?
- where will evaluations (e.g., soil or water samples) be taken from, when and over what period of time?
- how many labs will be used to process environmental samples? What are their records for accuracy in their analysis?
- what will be the EIS reporting process? Will the public be able to review their work during the evaluation process and provide feedback? How transparent will the process be?

**Corr. ID:** 185105 **Organization:** *Not Specified*

**Comment ID:** 30854 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In conducting the environmental review, please consider the following:

- What would be the benefit of using the East Bay Regional Parks as a model? Off-leash recreation with voice control is permitted in most areas of most parks. There seem to be virtually no problems with conflicts or over-crowding.;
- Would permitting off-leash voice control recreation in more areas disperse the use?

Would there be less impact? What would be the environmental benefit to having off-leash opportunities closer to people's homes? Would less automobile use (and thus less fuel use) be an environmental benefit?

-What are the social benefits of off-leash recreation? Is having numbers of people knowing each other because their dogs play together a benefit to the community? What are the benefits of the social inter-action between people who walk with their dogs who are otherwise isolated (people who work from home, live alone, or who are retired)?

-What are the health benefits of off-leash recreation? In an era of obesity, what are the benefits of a daily walk (rain or shine no matter what) with a canine coach?

-In Pacifica, areas have been added to the GGNRA, fought for by people who wanted to prevent development, but who assumed they would be able to continue to walk with their dogs. Are there positive environmental benefits to encouraging dog walkers to continue to walk at Mori Point (where the Park Service's own survey showed that 80% of the visitors were there walking with their dogs)? Are there benefits to encouraging more visits to Milagra Ridge and Sweeney Ridge (both virtually deserted, but quite suited to off-leash recreation)?

-What are the benefits of having rules that dog walkers can support? How does it benefit the GGNRA to have the ever present "dog people" to be the eyes and ears of the park?

-Please consider using "real science", not conjecture or assumption that off-leash recreation causes damage or negative environmental impact. Off-leash recreation enthusiasts ARE environmentalists and support environmental concerns, but are appalled at invalid conclusions and conjectures.

**Concern ID:**

12429

**CONCERN STATEMENT:**

Commenters suggested that the scope of the planning and negotiated rulemaking processes be expanded to include all areas of the GGNRA.

**Representative Quote(s):**

**Corr. ID:** 185113      **Organization:** *Not Specified*

**Comment ID:** 31177      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am also concerned about the "starting point" of areas to be considered. I think that at a minimum, all historically off-leash areas as outlined in the original 1979 Pet Policy should be on the table for consideration and to be very fair, the entirety of the GGNRA should really be carefully considered to look for other options that may work so as to spread out use of daily users, and the impact made on these wildly popular areas. These areas are massively popular with users and tourists of every sort - not just with the off-leash recreationalists. Crissy Field post-renovation is insanely crowded with users of nearly every variety, and new varieties of recreational use being invented on a regular basis! Thankfully, the one group not utilizing these areas are motorized off-road vehicles! But these are very high-impact areas. Not using the current legal Pet Policy as a starting point would not be a fair process to begin with.

**Corr. ID:** 185422      **Organization:** *Not Specified*

**Comment ID:** 31945      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The possible scope of the negotiated rulemaking discussion should include all areas of the GGNRA. If the committee agrees to limit the discussion, or quickly dispose of any discussion regarding sensitive habitat areas, that is its business to do, not the business of the GGNRA to predetermine with environmental analysis before the discussion takes place. Artificial constraints on the scope of discussion by the committee are against the public policy of allowing the committee to fully consider all possibilities in order to balance factors and give the best recommendation.

**Concern ID:**

12430

**CONCERN  
STATEMENT:**

Commenter states that the NEPA process is inappropriate at this time and should only be commenced when and if the negotiated rulemaking committee recommends a change in the current off leash policy.

**Representative  
Quote(s):**

**Corr. ID:** 185113      **Organization:** *Not Specified*

**Comment ID:** 31166      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I don't understand why there is a legitimate requirement for an EIS since designating areas for continued off-leash recreation in the GGNRA is not a change of use (although closing areas off to dogs that have been historically off-leash is), but a continuation of historical use that predates the GGNRA's management of these areas and which was specified after years of consideration in the 1979 Pet Policy.

**Corr. ID:** 185422      **Organization:** *Not Specified*

**Comment ID:** 31944      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I comment that the proposed environmental assessment process is both improper and economically wasteful to the extent it requires environmental analysis even if no change is proposed through the negotiated rulemaking process. Pursuing a formal environmental analysis where unnecessary also needlessly subjects the GGNRA to litigation exposure.

The negotiated rulemaking and suggested EIS process if pursued as suggested ' that environmental assessment will be performed even if there is no change ' improperly stands the environmental impact analysis procedures on their head. It appears biased to reverse the normal process and suggest environmental analysis compliance will be pursued even if the current status is not changed if any off leash dog walking at all is permitted, while avoiding reference to the need to do environmental compliance if the current off leash recreational access status is limited. The environmental assessment process should not be used as a sword to force politically desired change rather than being used in its normal role as a shield to protect against environmentally adverse change.

Moreover, in addition to being uneconomic, creating litigation exposure and creating public comment hassle, the proposed process is illegal to the extent it has the effect of sidestepping the rulemaking requirement recognized by the federal court... The NEPA compliance process must not be flipped such as to improperly interfere with the process by creating a barrier to maintaining the status quo even if the required rulemaking is not completed. [Judge Alsup's ruling requires that off leash pursuant to the 1979 policy remain unless rulemaking is completed, while the GGNRA process suggests that even if the negotiated rulemaking fails, off leash is not allowed without NEPA compliance.]

Hence, the NEPA compliance requirements should be construed to apply only to the extent that the negotiated rulemaking process reaches consensus for a change to the status quo current practice of authorized off leash access in certain areas. If there is no change to the current pattern of use, NEPA compliance is not an issue. If there is a change to the current pattern of use NEPA compliance may be implicated.

**PN1000 - Purpose And Need: Planning Process And Policy**

**Concern ID:** 12533

**CONCERN  
STATEMENT:**

Commenters suggest that the purpose of this process should include restoration of habitats and lands destroyed by dogs and their owners.

**Representative  
Quote(s):**

**Corr. ID:** 184934      **Organization:** *Not Specified*

**Comment ID:** 29499      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Purpose and Need: The purpose of this process should include restoration of habitats and lands destroyed by dogs and their owners. Dog management must incorporate ending dog impacts on our park's resources and repairing the damage done during the past 30 years.

The need for taking action should be apparent at Fort Funston and on Ocean Beach where one can't go without being faced with off-leash dogs, without seeing birds being harassed in violation of who knows how many federal and state laws, and without seeing dogs digging up the natural resource. There is a need to restore this park and return it to the public at large and not keep it as the domain of a single special interest group.

**Corr. ID:** 185441      **Organization:** Golden Gate Audubon Society

**Comment ID:** 29509      **Organization Type:** Conservation/Preservation

**Representative Quote:** Golden Gate Audubon urges the NPS to carefully analyze past, present and future impacts of dogs to wildlife and habitat in the GGNRA and to consider a National Environmental Policy Act (NEPA) Alternative that says no areas within the park are compatible with dog use.

#### PURPOSE OF THE DOG MANAGEMENT PLAN/EIS

According to the presentation, the purpose of the Plan and EIS is to "provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park." This statement assumes that there are some areas within the GGNRA that are appropriate for dog use. Golden Gate Audubon urges the NPS to carefully analyze past, present and future impacts of dogs to wildlife and habitat in the GGNRA and to consider a National Environmental Policy Act (NEPA) Alternative that says no areas within the park are compatible with dog use.

#### ***PN2000 - Purpose And Need: Park Purpose And Significance***

**Concern ID:** 12433

**CONCERN STATEMENT:** Commenters express the need to protect wildlife and wildlife habitat.

**Representative Quote(s):**

**Corr. ID:** 184777      **Organization:** GGA Conservation Committee

**Comment ID:** 31460      **Organization Type:** Unaffiliated Individual

**Representative Quote:** PARK SIGNIFICANCE

-Importance of the GGNRA as a migratory bird habitat component of the Pacific Flyway should be included as a Park Significance.

-In addition to it's historical and cultural significance, Alcatraz Island should also be recognized as a major colonial water bird breeding site.

**Corr. ID:** 184942      **Organization:** *Not Specified*

**Comment ID:** 29418      **Organization Type:** Unaffiliated Individual

**Representative Quote:** A primary purpose of many parklands is to preserve natural areas and historical resources and encourage humans to learn about, appreciate protect these resources, not to provide unrestricted access and accommodation to recreational pursuits at the expense of preservation.

**Corr. ID:** 184965      **Organization:** Center for Biological Diversity

**Comment ID:** 29654      **Organization Type:** Conservation/Preservation

**Representative Quote:** But with the dubious distinction of having the fourth-highest

concentration of imperiled species of any area in the national park system, the GGNRA's species conservation policies have been its most glaring failure.

**Corr. ID:** 185452      **Organization:** *Not Specified*

**Comment ID:** 32015      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 75. GGNRA is a most extraordinary example of biodiversity in continental national Park System. It has the most imperiled species excepting island parks.

**Concern ID:** 12434

**CONCERN STATEMENT:**

Commenters state that the urban location of GGNRA must be taken into consideration in the planning process.

**Representative Quote(s):**

**Corr. ID:** 185421      **Organization:** Crissy Field Dog Group

**Comment ID:** 31398      **Organization Type:** Recreational Groups

**Representative Quote:** The GGNRA is located near a major urban area and therefore, already exist and will be in the future, larger numbers of visitors and types of visitor uses. This needs to be considered in the planning for dog management as well as the upcoming update to the GGNRA GMP.

**Corr. ID:** 185445      **Organization:** *Not Specified*

**Comment ID:** 31958      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 1. Significance statements understates critical role that urban parks play in regard to recreation - i.e. contributing to the quality of life of the residents.

3. Urban parks provide recreation related to history, passive visual enclaves/respice areas from city congestion, educational experiences in natural resources renewal, restoration of habitats for wildlife and endangered species, and opportunities for cooperative management that allows a wide variety of joyful, meditative active sport pleasures

### **PN4000 - Purpose And Need: Park Legislation/Authority**

**Concern ID:** 12435

**CONCERN STATEMENT:**

Commenters state that off leash dog walking should be allowed pursuant to 1979 Pet Policy and the 1996 Superintendent's Compendium.

**Representative Quote(s):**

**Corr. ID:** 185219      **Organization:** *Not Specified*

**Comment ID:** 31478      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am also one of the millions of Americans who view their dog not only as family, but as our main partner in outdoor recreation. We acutely feel the loss of access to open space that has occurred over the past 10-20 years across the U.S., and resent the forces attempting to restrict our partners to private space while fewer of us actually have access to private space. We also view this as an environmental imbalance. We find the 36 CFR 2.15 (a) (2) deeply offensive and anti-democratic, as well as the notion that such rules should apply uniformly across the system, without regard to specific park context or local interests. Worse still, such regulation is being viewed as a model for all federal lands, and we face the threat of bans from other lands, including the National Forest Service. For the majority of Americans who are not wealthy enough to own private acreage, this is becoming a crisis.

**Corr. ID:** 185458      **Organization:** *Not Specified*

**Comment ID:** 30657 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please allow off leash dog walking to continue in designated areas of the Golden Gate Recreation Area (GGNRA), most especially Crissy Field/Beach. Areas for off leash dog walking are described in the July 8, 1996 compendium developed, after careful study, by Superintendent Brian O'Neil. The total area designated for off leash dog walking in the compendium is less than 1/2 of one percent of the 75,000 acres in the GGNRA. The Park Service has over twenty-eight years of data to support the position already taken by its Superintendent. An on leash requirement would contradict promises made in 1979 and 1996 by the Park Service for the continuation off leash dog walking in specified areas of the GGNRA.

Off leash dog walking was one of the continuing use recreations contemplated when the Golden Gate National Recreation Area (GGNRA) was formed in 1972. The GGNRA's February 24, 1979 "Pet Policy" was formalized in the Compendium signed by Brian O'Neil on July 8, 1996.

The recreational value of the Golden Gate National Recreation Area was of the utmost importance to Congress when it established this great urban park. In its words, the GGNRA was to be a "new national urban recreation area that will concentrate on serving the outdoor recreation needs of the people of the metropolitan region." Its objective was not to restrict but, "to expand to the maximum extent possible the outdoor recreation opportunities available in this region."

**Concern ID:**  
**CONCERN**  
**STATEMENT:**

12436  
Commenters believe that off leash dog walking is inconsistent with established laws and policies.

**Representative**  
**Quote(s):**

**Corr. ID:** 185440 **Organization:** *Not Specified*

**Comment ID:** 30915 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I do not believe there should be offleash/offtrail dog walking anywhere in GGNRA. I do not believe it is consistent with the laws and policies that apply to all national parks that provide that resource protection and conservation should take precedence over other uses of a park, including recreation. Creating authorized offleash/offtrail dog walking areas in GGNRA will set a precedent whereby such areas can later be established in any national park.

**Corr. ID:** 187669 **Organization:** Center for Biological Diversity

**Comment ID:** 31549 **Organization Type:** Conservation/Preservation

**Representative Quote:** Nor does the fact that Congress established the GGNRA as a National Recreation Area, rather than a National Park, change the applicable principles of land management. As a preliminary matter, Congress mandated that the GGNRA be managed in accordance with the National Park Service's Organic Act, 16 U.S.C. § 1 et seq., as amended and supplemented. 16 U.S.C. § 460bb-3. The Organic Act itself requires that all units of the National Park System be managed "to conserve the scenery, and the natural and historic objects, and the wildlife therein and . . . leave them unimpaired for the enjoyment of future generations." 16 U.S.C. § 1. Furthermore, in the past when the National Park System attempted to manage Recreation Areas in a less protective manner, Congress amended the Organic Act to prohibit such artificial distinctions:

[T]he national park system, which began with establishment of Yellowstone National Park in 1872, has since grown to include superlative natural, historic, and recreation areas in every major region of the United States . . . ; that these areas, though distinction character, are united through their inter-related purposes and resources into one national park system as cumulative expressions of a single national heritage; . . . and that it is the purpose of this Act to include all such areas in the System.

16 U.S.C. § 1a-1. (emphasis added). As pointed out in *Bicycle Trails Council v. Babbitt*, 1994 U.S. Dist. LEXIS 12805 (N.D. Cal. 1994) (off's, 82 F.3d 1445 (9th Cir. 1996)), a case that dealt specifically with management at the GGNRA, "[the National Park Service] interpreted Congress's amendments to the Organic Act to be clear in the message that [the National Park Service] . . . was to manage all units of the park system so as to effect the purpose of the Organic Act—primarily resource protection." *Id.* at \*18.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31548      **Organization Type:** Conservation/Preservation

**Representative Quote:** The cornerstone of Congress' national urban park experiment was to ensure that the GGNRA was not managed as if it were another city playground or ball field. Instead, Congress commanded that the GGNRA be preserved "as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area." 16 U.S.C. § 460bb (emphasis added). As such, Congress further commanded that recreational and educational uses "shall" only occur if they are "consistent with sound principles of land use planning and management." *Id.*

The legislative history makes clear that Congress suspected, but did not mandate, that certain uses may be compatible with sound management of the park. For example, Congress suggested that park visitors might "fly kits [sic], sunbathe, walk their dogs, or just idly watch the action along the bay" while visiting Crissy Field. 1972 U.S.C.C.A.N. at 4852. However, contrary to assertions made by irresponsible dog owner groups advancing a voice control agenda, nowhere in the National Park Service's Organic Act, the act establishing the GGNRA, or in the relevant legislative history did Congress suggest that off-leash dog walking should be allowed: indeed, given that Congress must have been aware that the National Park System had a nationwide regulation requiring all dogs to be on-leash while visiting National Parks at the time the GGNRA was created, the only reasonable conclusion from this portion of the legislative history is that Congress contemplated people walking their dogs on-leash while visiting Crissy Field. See Miles

*v. Apex Marine Corp.*, 498 U.S. 19, 32 (1990) ("We assume that Congress is aware of existing law when it passes legislation."); *United States v. Hunter*, 101 F.3d 82, 85 (9th Cir. 1996) (Ninth Circuit "presume[s] that Congress is knowledgeable about existing law pertinent to the legislation it enacts.") (internal quotations omitted).

***PN7000 - Purpose and Need: Adequacy of EIS Purpose and Need***

**Concern ID:** 12609

**CONCERN STATEMENT:** Commenters requested the inclusion of additional criteria in the stated purpose and need.

**Representative Quote(s):** **Corr. ID:** 185445      **Organization:** *Not Specified*

**Comment ID:** 31979      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 24. Purpose and need doesn't incorporate human health, but it should. Dogs and cats carry 30 infectious diseases that are transmitted through feces.

**Corr. ID:** 185452      **Organization:** *Not Specified*

**Comment ID:** 32006      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 37. Purpose should include a safe environment for socialization and recreation for dogs and owners who use the park.

**Corr. ID:** 185452      **Organization:** *Not Specified*  
**Comment ID:** 32002      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** 6. Improving the experience of all park visitors needs to be considered in purpose statement.

***PN8000 - Purpose And Need: Objectives In Taking Action***

**Concern ID:** 12438

**CONCERN STATEMENT:** Commenters state that the objectives outlined in the public scoping brochure are already being met, and therefore there is no need to take action.

**Representative Quote(s):**

**Corr. ID:** 184961      **Organization:** *Not Specified*

**Comment ID:** 30930      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The brochure also notes goals of protecting park resources, providing a variety of visitor experiences, reducing visitor use conflicts, ensuring that park resources and values are available for future generations, and increasing the safety of visitors and staff.

I believe these goals are met by the 1979 Pet Policy, which provides areas where people and their off leash dogs can enjoy the National Parks. The variety of visitor experiences for people without pets is endless since 99% of the parks are available if more variety is needed. Ensuring that this park is available for families and their off leash pets is the request, and providing clear signs and boundaries will both help to protect our natural resources and to decrease any use conflicts. If signs indicate an area allows off leash dogs, people who do not wish to participate in this environment can use another park venue. Individual dog owners as well as dog walkers recognize the value of off leash exercise for the physical and mental well being of both the pets and their people. A sense of community has developed, with relationships and social circles developing in these parks that are sadly lacking in today's rushed society.

**Corr. ID:** 184968      **Organization:** *Not Specified*

**Comment ID:** 31216      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The reasons that are stated in the Public Scoping Workshops brochure as objectives for development of alternatives for the dog management plan are bulleted below with responses and input provided for each one.

- Protect native species and habitat, including any threatened, endangered, unique, or rare species from impacts associated with dog walking.

If there are currently any of the above items present at Fort Funston, the signs provided to inform of this are sadly lacking, not well posted, or too infrequent.

- Minimize degradation of soil and water resources by dog walking

If input has been provided to the public to assist with this objective, it has not been distributed or provided by signs in a fashion that is adequate.

- Be enforceable

This would be much appreciated. As noted above, signs in the GGNRA are lacking. Signs to indicate where off leash dog walking is currently allowed are not available, nor are signs indicating ongoing or seasonal fragile plant and wildlife. Fencing, which is mentioned in the document, would also be helpful both to better define boundaries and to aid in enforcement both from the public and the park management's points of view.

**Corr. ID:** 185187      **Organization:** *Not Specified*

**Comment ID:** 29241      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 4. Ensuring that park resources and values are available for future generations:

-Who is asking you to do this?

-What are your values?

-What are current users doing to diminish park resources?

What I have seen at Fort Funston (and at Golden Gate Park) has been nothing short of a social Renaissance. I have witness many acts of kindness from people literally lending a hand to strangers to help with their dogs, feed dogs, cleaning up after one's self, filling in holes, volunteering to pick up litter, volunteering to keep boxes filled with bags for disposal pickup, and generally the enjoyment of helping out others for the sheer joy of it. I don't see how the government is going to create any better values than what is being demonstrated at this time by park users.

This bulleted point indicates members of the GGNRA do not get out to their parks at all. If you did, you would see the resources and values (which is not your job to shape) are being practice daily and visible for all to see.

5. Increasing the safety of visitors and staff:

This is a valid point. Certainly with the recent storms, some areas are more dangerous to pass with downed trees, tree limbs, sink holes, shifting soil and terrain, etc. However, when this has occurred, it has been the daily and weekly users who pass the word around about such dangers. And, at times, we move limbs when possible. Eventually, your staff is informed AFTER and at time posts the necessary signs, etc. And, I do not see members of your staff patrolling to ensure anyone's safety, so please don't start now.

Another valid point your study makes has to do with some dogs that can be violent. However, the users (and I have witnessed this several times) of the GGNRA again get the word out about which dogs to watch out for. Furthermore, when some dogs (and people) are too dangerous, users have ostracized them or have called the authorities to do so. Fortunately, most dog owners are savvy enough to recognize their dog's problem and correct it. Why wouldn't they? Their dogs need the recreation and an owner who will not make the necessary changes will be asked to leave.

Moreover, dogs are protection. The more dogs and dog walkers, the less likely their will be major problems. The more you attempt to close this area off, the fewer visitors will visit and they will become isolated and targets for criminals.

**Corr. ID:** 185187      **Organization:** *Not Specified*

**Comment ID:** 29240      **Organization Type:** Unaffiliated Individual

**Representative Quote:** PURPOSE FOR TAKING ACTION

Your 5-bulleted items noted below make no sense whatsoever. From my experience at Fort Funston, I have yet to see the need for the GGNRA to take any further action.

Users, including this writer, have done their part as noted in the following:

1. Protecting park resources:

-By cleaning up after their dogs and whatever litter they/I may drop

-Respecting fenced off areas by quickly leading dogs out once they cross that line

-Enforcing a code of conduct for each person and his/her dog has been strictly adhered to by dog walkers, horse riders, bicyclists, and other visitors.

-I challenge you to find even a cigarette butt out at Fort Funston.

2. Providing a variety of visitor experiences:

Users are free to get what they want out of any GGNRA area as long as they respect the laws and others. Your attempts to regulate this will only force the public to go elsewhere. And, when we do, and you have less you, won't this reduce the need for

your staff's services, which means a leaner budget?

3. Reducing Visitor Use Conflicts:

Again, you are seeking to enhance your enforcement arm. Allow the public to use these areas and when conflicts arise, we can solve them ad hoc. To date, I have not witnessed so much as an argument about the weather at Fort Funston.

**Concern ID:**

12439

**CONCERN STATEMENT:**

Commenters would like an objective to be included that incorporates enforcement criteria for all dog use in GGNRA.

**Representative Quote(s):**

**Corr. ID:** 184934      **Organization:** *Not Specified*

**Comment ID:** 31364      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plan Objectives: Include an objective that incorporates enforcement criteria for all dog use of GGNRA. Should off leash dogs be permitted in GGNRA, that criteria should specify what is appropriate behavior for dogs and what is inappropriate. It must spell out what voice control is and what it is not. An owner screaming at a running dog to return as the owner chases it down the beach is not an example of voice control and that type of situation should trigger a citation. A satisfactory criterion might be that the dog responds to a command by the second time it is given. If it takes a third command, the dog is beyond voice control and the owner is subject to a citation. Objectives should be developed for the protection of the resource and for the restoration of degraded areas.

**Corr. ID:** 185441      **Organization:** Golden Gate Audubon Society

**Comment ID:** 31379      **Organization Type:** Conservation/Preservation

**Representative Quote:** DOG MANAGEMENT PLAN OBJECTIVES THAT ALL ALTERNATIVES MUST ADDRESS

This portion of the presentation lays out several items that all NEPA Alternatives must address, and begins with the premise that all Alternatives will "create dog walking opportunities." Again, this assumption ignores the possibility that the Naps' findings regarding the impacts of dogs on wildlife will dictate that no areas within the GGNRA are compatible with dog walking. In fact, this statement actually goes a step farther away from this possibility, implying that the Alternatives must actually "create" and open up new dog walking opportunities beyond what currently exists at the GGNRA. Given that nearly the entire GGNRA is effectively already open to dog walking and off-leash dog walking because of lack of enforcement, it is inappropriate to say all NEPA Alternatives must create new dog walking opportunities.

Because lack of enforcement at the park has been an ongoing issue of contention and because there can be no meaningful Dog Management Plan without enforcement, Golden Gate Audubon feels it is absolutely essential that all Alternatives include specific details on how existing and new dog regulations within the GGNRA will be enforced. Any Dog Management Plan or EIS Alternative must also include funding for enforcement.

The fifth bulleted point says any Alternative must address creating, "an enforceable commercial dog walking policy." Golden Gate Audubon believes that the commercial dog walking policy NPS considers must include the possibility of no commercial dog walking at the park, depending on the assessed safety and environmental impacts of such activity.

**Concern ID:**

12440

**CONCERN STATEMENT:**

Commenter states that the objective should be to prevent not minimize degradation of soil and water resources.

**Representative Quote(s):**

**Corr. ID:** 184777      **Organization:** GGA Conservation Committee

**Comment ID:** 31461 **Organization Type:** Unaffiliated Individual

**Representative Quote:** OBJECTIVES

-The objective should be to PREVENT (not "minimize") degradation of soil and water resources. The word "minimize" connotes an acceptable level of degradation of soil and water resources by dog walking.

-Potential Environmental Impact Topics should include:

-Law enforcement resources

-Budget allocation - Funding of dog management should not cut into other park projects.

### ***PN9000 - Purpose And Need: Issues And Impact Topics Selected For Analyses***

**Concern ID:** 12442

**CONCERN STATEMENT:** Commenters suggested numerous issues and impact topics that should be analyzed in the EIS.

**Representative Quote(s):** **Corr. ID:** 184934 **Organization:** *Not Specified*

**Comment ID:** 31365 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Issues: Issues that need to be addressed include protecting restored areas, limiting the number of dogs per person: 2 leashed dogs to 1 person. If off-leash dogs are accommodated the ratio should be 1:1.

Potential impacts: Impacts need to be addressed on natural areas, restored areas, bluffs and cliffs, water, wildlife and the general public.

Resources: An environmental assessment should be developed to identify what has been lost because off-leash dogs and their owners have impacted GGNRA since it's inception. That assessment needs to be historic and needs to assess current conditions. The areas of coverage should include geographic resources such as cliffs, dunes and water; wildlife resources including mammals, birds, reptiles and amphibians, fish, insects, etc.; plants, both specific species and habitat types and zones; resources, historic, cultural and infrastructure.

Public safety: Visitor safety should be addressed. An annual public report should be issued regarding dog-visitor conflicts; dog-wildlife interactions; dog - plant and resource problems; enforcement cost & dog generated revenue; a summary review of citations issued for violation of dog regulations. Such reports could help determine how the next dog management plan evolves.

**Corr. ID:** 185201 **Organization:** *Not Specified*

**Comment ID:** 31407 **Organization Type:** Unaffiliated Individual

**Representative Quote:** General GGNRA Issues

-NPS needs to use scientific data (not just literature searches) as part of their decision making process in determining where sensitive habitats and/or endangered species are located within the GGNRA. The EIS needs to clearly state what assumptions are for these habitats. The alternatives should consider options for the use of seasonal restrictions, versus year round restrictions, for some areas.

-If there are perceived increase conflicts surrounding off leash dog walking, the NPS should be able to identify and quantify these conflicts.

-Identify all areas within the GGNRA where people currently walk dogs off leash (both legally and illegally). This should be considered the basis for no change and should be one of the alternatives studied in the EIS, even if this activity is not part of the 1979 Pet Policy. Examples include Mori Point, Milagra and Sweeny Ridges in San Mateo and East Ft. Baker in Marin.

-The Dog Management Plan should consider the impact of thousands of people at

Crissy Field during high volume events such as Fleet Week or Fourth of July as a large amount of open space (including grassy and dune areas) are heavily disturbed.

-The Dog Management Plan should consider the amount of cleanup and habitat care by already provided by existing dog groups.

Resource Management Issues

-The NPS should study scientific evidence of impacts by off leash dog users as compared to other NPS user groups, including recreational users. Identify and consider cumulative impacts of these users groups and options for reducing impacts, including changes to current land use designations.

-The NPS should study the value of dispersing recreational uses and activities across park areas and resources, including off leash recreation.

-Provide the scientific data to establish wildlife protection/wildlife sanctuary areas within the GGNRA.

**Corr. ID:** 185431      **Organization:** *Not Specified*

**Comment ID:** 31427      **Organization Type:** Unaffiliated Individual

**Representative Quote:** II. Issues to be Considered as Part of the Planning Process and EIS

A. GGNRA lands are and historically have been open to people with off-leash dogs.

B. The majority of dogs require off-leash exercise to be healthy.

C. The presence of walkers with off-leash dogs fosters a safe park environment and discourages crime.

D. The closure of GGNRA lands to walkers with off-leash dogs likely will result in San Francisco parks' having to absorb displaced walkers. City parks are largely unsuitable for off-leash dogs due to the size of the parks and their proximity to traffic.

E. Wild animals, their habitats, and plant species of concern should be protected.

F. Paved and unpaved trails are appropriate for off-leash dog use.

G. The majority of dog walkers take responsibility for the actions of their dogs. The Fort Funston dog group sponsors monthly clean-ups. The conduct of regular walkers exhibits pride of ownership and a great appreciation for the benefits that off-leash dog access at Fort Funston offers.

H. People can and should be held accountable for their use of public lands. Those individuals who do not act responsibly and do not cause their dogs to do so, should be the ones penalized. Responsible dog walkers and their dogs must not be penalized for the actions of the few.

1. Off-leash dogs should be under voice command.

**Corr. ID:** 185445      **Organization:** *Not Specified*

**Comment ID:** 31962      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Under "Potential Environmental Impact Topics," there should be a "Quality of Life for Dogs" impact topic. Add as a "Potential Environmental Impact Topic" quality of life of local residents "both dog owners and non-dog owners.

### ***PN11000 - Purpose And Need: Other Policies And Mandates***

**Concern ID:** 12431

**CONCERN STATEMENT:** Commenters state that any dog management policy should include strict leash law enforcement.

**Representative Quote(s):** **Corr. ID:** 185217      **Organization:** *Not Specified*

**Comment ID:** 30952      **Organization Type:** Unaffiliated Individual

**Representative Quote:** There should be absolutely no dogs permitted on any beach in the GGNRA. The National Parks have strict laws which must be followed. Public safety and protection must come before anything. Enforcement and heavy fines are clearly needed.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity  
**Comment ID:** 31514      **Organization Type:** Conservation/Preservation

**Representative Quote:** The National Park System's leash law is an effective method of ensuring that our pets have reasonable access to National Parks while preserving the parks unimpaired for future generations to enjoy. Unless and until the National Park Service promulgates and enforces the leash law at the GGNRA, the park's ability to protect people, pets, wildlife, and the park itself from the threats imposed by off-leash dogs will be greatly diminished.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity  
**Comment ID:** 31551      **Organization Type:** Conservation/Preservation

**Representative Quote:** Unfortunately recent court decisions have made it even more difficult for the park to cite dog owners who allow their dogs to roam off-leash and impact park resources. For example, on December 12, 2004, a Park Ranger was attempting to explain the importance of the leash law to six dog walkers who had their dogs off-leash. These individuals "surrounded" the Park Ranger and attempted to debate the Park Ranger about the Magistrate's Order in an "openly hostile demeanor." See ex. 105. In order to prevent the contact from escalating "into a fracas requiring additional units, [the ranger] departed the area." Id. Similarly on March 1, 2005, Park Rangers found a dog owner with three off-leash dogs sitting off-trail in sensitive butterfly habitats, only a few hundred yards away from posted signs that contain leash law requirements and information about the endangered mission blue butterfly. See ex. 106. When told of the infraction, the dog owner became argumentative and stated "[w]e beat you at Fort Funston, and at Crissy Field, we don't have to leash our pets." Id. He continued, "the leash law was abolished and only applied to a few parks." Id.

### ***PO1000 - Park Operations: Guiding Policies, Regs And Laws***

**Concern ID:** 12443

**CONCERN STATEMENT:** Commenter states that GGNRA administrators have not been complying with NPS' established leash laws.

**Representative Quote(s):** **Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31512      **Organization Type:** Conservation/Preservation

**Representative Quote:** In the San Francisco Bay Area, home to the Golden Gate National Recreation Area, one of our nation's boldest conservation experiments there is broad support for leash laws in our parks, with over 71% of the general public supporting the leash laws that protect the GGNRA. (See exhibit 107)

Unfortunately the administrators of the GGNRA have not been faithful to the National Park System's leash laws or the public's will to see these laws enforced. For over two decades, GGNRA administrators have pursued a policy of non-enforcement of leash laws at the park, ignoring validly promulgated pet management regulations and instead adhering to a voice control agenda in significant portions of the GGNRA. Perhaps most disturbingly, this policy was implemented without using informal or formal rulemaking procedures, depriving the general public of any opportunity to express its overwhelming support for leash law protections at our parks.

### ***PO4050 - Park Operations: Impacts of No Action/Current Conditions***

**Concern ID:** 12445

**CONCERN STATEMENT:** Commenters state that signs currently provided to inform the public about native species and habitat are inadequate.

**Representative Quote(s):**

**Corr. ID:** 185069      **Organization:** *Not Specified*

**Comment ID:** 29502      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Protect native species and habitat, including any threatened, endangered, unique, or rare species from impacts associated with dog walking.

If there are currently any of the above items present at Fort Funston, the signs provided to inform the public are absent, not well posted, or too infrequent.

**Concern ID:**  
**CONCERN STATEMENT:**

12447

Commenters state that there aren't enough park rangers to administer the park adequately.

**Representative Quote(s):**

**Corr. ID:** 184610      **Organization:** *Not Specified*

**Comment ID:** 31150      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I know that I am a bit long winded, but only because I feel so strongly that Fort Funston needs to remain a haven for dogs. A ban, full or partial, on dogs at the park will be seen as a discriminatory action against the hundreds of San Franciscans who require the space. Moreover, such a ban will stretch the already thin budget even thinner because enforcement of any ban will require the addition of two to four full time staff persons.

**Corr. ID:** 184817      **Organization:** *Not Specified*

**Comment ID:** 31152      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I cannot recall the last time I saw a Park Ranger in the GGNRA - I realize that the Park Service has a severe financial crisis with the huge cutbacks, but here we have one of the most used Parks in the State and we cannot, at least, have a Ranger, either on foot or mountain bike, randomly patrolling the trails, especially on the weekends.

**Corr. ID:** 185016      **Organization:** Center for Biological Diversity

**Comment ID:** 29659      **Organization Type:** Conservation/Preservation

**Representative Quote:** An off-leash dog started to chase and harass this endangered species, so a report was called into the park police. I was told that the park would not be able to respond to the harassment of this endangered species because all of the park rangers were responding to the dog that had fallen off the cliff.

**Corr. ID:** 185089      **Organization:** *Not Specified*

**Comment ID:** 31069      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The absence of enforcement of off leash laws has been a disaster for ordinary, casual visitors to the GGNRA. For the safety of individuals, families and children and the protection of our endangered species you are meant to be protecting, we need strong enforcement of stringent leash laws.

**RF1000 - References: General Comments**

**Concern ID:**  
**CONCERN STATEMENT:**

12546

Commenters recommended numerous references for GGNRA to consider while developing the dog management plan.

**Representative Quote(s):**

**Corr. ID:** 184964      **Organization:** *Not Specified*

**Comment ID:** 31485      **Organization Type:** Unaffiliated Individual

**Representative Quote:** From the San Francisco Chronicle:  
Maybe your dog behaves, but does its owner?

Eileen Mitchell, Special to The Chronicle  
Saturday, April 22, 2006

**Corr. ID:** 184965      **Organization:** *Not Specified*  
**Comment ID:** 31483      **Organization Type:** Conservation/Preservation  
**Representative Quote:** OPEN FORUM  
Stewards of the Earth  
On-leash rules optimal for all  
Brent Plater

Sunday, April 21, 2002

Main Opinion Page  
Chronicle Sunday Insight  
Chronicle Campaigns

SF Chronicle Submissions  
Letters to the Editor  
Open Forum  
Sunday Insight

**Corr. ID:** 185011      **Organization:** *Not Specified*  
**Comment ID:** 31484      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Copyright 2005 SF Weekly, LP  
SF Weekly (California)

February 16, 2005 Wednesday

HEADLINE: San Francisco Dog Court  
Due process, under the law, for every canine

BYLINE: By LUKE O'BRIEN

**Corr. ID:** 185018      **Organization:** Center for Biological Diversity  
**Comment ID:** 31614      **Organization Type:** Conservation/Preservation  
**Representative Quote:**  
Off-leash Dog Harasses Birds at Ft. Funston 4-13-06 small. wavy  
6-6-05 Dog Defecating While Owner Unaware at Fort Funston. jpg  
Bank Swallow Sign with Dog Poop.jpg  
Dog Chases Willets 2.jpg  
Dog Chases Willets.jpg  
Dog in Wildlife Protection Area.jpg

**Corr. ID:** 185022      **Organization:** Center for Biological Diversity  
**Comment ID:** 31552      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** TITLE: Restoration of breeding by snowy plovers following  
protection from  
disturbance  
AUTHORS: Kevin D. Lafferty<sup>1,2</sup>, Darcie Goodman<sup>2</sup> and Cristina P. Sandoval<sup>3</sup>  
ADDRESSES:  
1-United States Geological Survey,  
Western Ecological Research Center  
805.893.8778  
Lafferty@lifesci.UCSB.edu  
2- Donald Bren School of Environmental Science and Management  
University of California, Santa Barbara

Santa Barbara, California 93106  
3- Marine Science Institute  
University of California, Santa Barbara  
Santa Barbara, California 93106  
1Corresponding author

**Corr. ID:** 185030      **Organization:** *Not Specified*  
**Comment ID:** 31622      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Dogster.com%20Forum%20Dogs%20Leash%20Laws(1).pdf  
King, Trish, Dog Parks the good, the bad, and the ugly.pdf  
AKC Good Citizen Agreement.pdf  
AKC Love Your Dog, Leash Your Dog Campaign.pdf  
SF Dog Parks Compared to the Other Major Citys.xls

**Corr. ID:** 185057      **Organization:** Center for Biological Diversity  
**Comment ID:** 31606      **Organization Type:** Conservation/Preservation  
**Representative Quote:** scientificreviewsSFNAP\_huntsigner.pdf  
Lafferty, Kevin D. Birds at a Southern California Beach.pdf  
Lafferty, Kevin D. Disturbance to Wintering Snowy Plovers.pdf  
scientificreviewofSFNAP\_fielder.pdf  
SF DOG Admit barriers required.pdf  
Kathey Diamond Davis Reccomendations on Dog Parks.pdf

**Corr. ID:** 185100      **Organization:** *Not Specified*  
**Comment ID:** 31158      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Also please review the Redwood Creek Watershed Vision Statement which has been repeatedly endorsed by Muir Beach representatives and places resource and wildlife preservation first. The Redwood Creek watershed deserves special dog management, more strict than GGNRA areas near San Francisco, for example, and should not be a "loose regulation" area for dog walkers from the city!

**Corr. ID:** 185187      **Organization:** *Not Specified*  
**Comment ID:** 29243      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** SOLUTIONS  
Throughout the Bay Area are numerous dog parks big-and-small that co-exist with nature trails, bike trails, etc. It is certainly worth your review committee's time to visit these to see that they do work. There is no reason to close one and force users elsewhere.

I would refer you to  
-Canine Commons-Dry Creek Road, Napa, CA as well as to the following listing.  
-I would encourage you to contact local businesses for their input.  
More specifically, local pet stores, large and small, and please include their marketing departments. Again, there has been a proliferation of large pet store chains. This most certainly indicates an upswing in pet ownership. Would it make sense to keep GGNRA areas available?  
-I would encourage you to contact the numerous veterinarians in and about the Bay Area as well as at U.C. Davis for their input.  
-Please see Tim Stienstra's April 13, 2006 article about local Dog Parks. 2-of-the-five parks he references are part of the GGNRA. Someone as influential as Mr. Stienstra would not mention these parks in valuable newspaper space unless he was encouraging use. Have you contacted Mr. Stienstra?

There are more than enough resources for your group to contact to help direct your study to a more mutually beneficial outcome.

**Corr. ID:** 185215      **Organization:** *Not Specified*

**Comment ID:** 31243      **Organization Type:** Unaffiliated Individual

**Representative Quote:** strongly recommend that the Negotiated Rule-making Committee and the GGNRA pay serious attention to the possible health problems created by dog feces which can certainly contaminate soil, sand, grass or other materials. Such materials may be unknowingly ingested by an inquisitive infant or toddler. In addition, certain diseases are spread by contact with human skin thus infecting adults as well as children. The following is a partial list of parasitic and bacterial diseases spread to humans by dog feces:

- 1- Amebiasis
- 2- Ancylostomiasis (dog hookworm)
- 3- Balantidiasis
- 4- Cutaneous larva migrans (creeping eruption hookworm)
- 5- Echinococcosis (hydatid cyst disease)
- 6- Salmonellosis
- 7- Visceral larva migrans (toxocariasis or dog roundworm)

The references for the above include:

1-DISEASES TRANSMITTED FROM ANIMALS TO MAN, ed. 5, edited by T.G.Huil, Charles C. Thomas, Springfield Ill. publisher, 1963.

2 -THE THEORY AND PRACTICE OF PUBLIC HEALTH, ed. 3, edited by W. Hobson, Oxford University Press, London, 1969.

In the interest of public health, the Committee and GGNRA should restrict dogs to areas where they will not expose small children and others to unnecessary health hazards.

**Corr. ID:** 185383      **Organization:** *Not Specified*

**Comment ID:** 30779      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I strongly urge you to consult the following experts who have great knowledge in these matters:

Sgt William Henderson, SFPD

Officer John Denny, SFPD

Carl Friedman, SF animal Care and Control

Vicky Guldbeck, SF animal Care and control

**Corr. ID:** 185445      **Organization:** *Not Specified*

**Comment ID:** 31978      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 21. Consider using as a data source the Beachwatch survey database from Farallone Marine Association (this is the organization that supports the Farallone National Marine Sanctuary). This is hard data that plots the number of birds noted and the number of dogs. This database is updated monthly, and goes back to 1992. It can be accessed at the Marine Sanctuary offices.

**Corr. ID:** 187673      **Organization:** *Not Specified*

**Comment ID:** 31626      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Also included is a copy of recommendations for dog park design from Kathy Diamond Davis that describe how off-leash dogs can harm a dog's socialization process. This impact must be adequately assessed by the park in any alternative that provides for off-leash recreation.

**Corr. ID:** 187697      **Organization:** Center for Biological Diversity

**Comment ID:** 31609      **Organization Type:** Non-Governmental

**Representative Quote:** Video Title:

Off-Leash Dog Lost, Falls Off Cliff, Rescued by NPS 4-13-06.wmv

**Corr. ID:** 187698      **Organization:** Center for Biological Diversity

**Comment ID:** 31610      **Organization Type:** Non-Governmental

**Representative Quote:** Attached is a video and several photos of dogs chasing, harassing and disturbing shorebirds at the GGNRA. Please include these files as part of the comments received by the GGNRA on the scoping for pet management at the park.

Video/Picture Titles:

Off-Leash Dog Harasses Birds at Ft. Funston 4-13-06 small.wmv

6-6-05 Dog Defecating While Owner Unaware at Fort Funston.jpg

Bank Swallow Sign with Dog Poop.jpg

Dog chases willets 2.jpg

dig chases willets.JPG

Dog in Wildlife Protection Area.jpg

**Corr. ID:** 187699      **Organization:** *Not Specified*

**Comment ID:** 31613      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Off-leash dog lost,Falls off cliff, Rescued by NPS 4-13-06.wmv

**Corr. ID:** 185445      **Organization:** *Not Specified*

**Comment ID:** 31978      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 21. Consider using as a data source the Beachwatch survey database from Farallone Marine Association (this is the organization that supports the Farallone National Marine Sanctuary). This is hard data that plots the number of birds noted and the number of dogs. This database is updated monthly, and goes back to 1992. It can be accessed at the Marine Sanctuary offices.

### ***SE4000 - Socioeconomics: Impact Of Proposal And Alternatives***

**Concern ID:** 12451

**CONCERN STATEMENT:** Commenters state that NPS must consider economic impact on the local impact of restricting off leash recreation on the local community.

**Representative Quote(s):** **Corr. ID:** 185187      **Organization:** *Not Specified*

**Comment ID:** 29242      **Organization Type:** Unaffiliated Individual

**Representative Quote:** ECONOMIC IMPACT

Do you realize that if your force people to leash their dogs and reduce or eliminate their use of GGNRA areas, they/we will go elsewhere? Who will immediately suffer the most? The local retailers will lose business. At present, I do most of my dog's shopping after I go to Fort Funston. I often get other items for me elsewhere. Had I not gone to Fort Funston (or another GGNRA for that matter), I would not have done any of this otherwise. If the GGNRA eliminates off leash use, I'll be forced to keep my dog in my neighborhood. Local pet stores (PetSmart, Petco, Pet Food Express, etc) will feel the effects. I won't be going out to shop.

Why are you punishing them?

Many of these stores have expanded to the San Francisco area because we are blessed with so many wonderful areas to exercise our dogs and enjoy this area's beauty. The retailers have recognized this and have set up shop here for that reason. You are now working against business. You are then working against the tax base. You are then further chocking off the area. Please explain why you choose to do this? The economy will suffer.

## ANIMALS

Obviously, we live in an urban area. The many GGNRA areas are the only immediate outdoor experiences people of this area have. Equally important, some of these wide open spaces, especially Fort Funston, are the only areas dogs can run. Why are you denying this to animals? Don't you find your decision cruel? Do you own a dog? Would you want to deny your dog this or your family the enjoyment of sharing their pet's joy at such a place? Please, hands off.

## QUESTIONS

\*Have you consulted with business that would be impacted by this? Pet stores, restaurants, coffee shops, etc?

\*Have you at least consulted with a panel of veterinarians and biologists? Who is making the final decision and what will this be based on?

\*Quite frankly, why are you doing this study? It's already been done. Things are not broken or in need of repair in most GGNRA areas. As the saying goes, "if it aint broken, don't fix it."

**Corr. ID:** 185450      **Organization:** *Not Specified*

**Comment ID:** 31284      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The EIS should also consider the economic costs of trying to enforce any ban on off-leash dogs. Wouldn't the money be better spent restoring areas not in dispute? Which would result in a greater environmental benefit—spending a lot of money to enforce an unpopular ban on off-leash dogs, or spending the same amount of money on restoring areas where dogs are not walked? The community of dog owners contributes significantly to the local economy—contributing over \$25 million in sales tax alone to the city coffers in San Francisco every year.

## ***TE5000 - Threatened and Endangered Species: Impact of No Action/ Current Conditions***

**Concern ID:** 12453

**CONCERN STATEMENT:** Commenters are concerned about the impacts of current dog management to threatened and endangered species present at GGNRA.

**Representative Quote(s):** **Corr. ID:** 184865      **Organization:** *Not Specified*

**Comment ID:** 30970      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Off leash dogs prevent the birds who need to feed at the water's edge from doing so. Because of the presence of dogs near and in the water there were no shore birds feeding, as there normally are when dogs are not present. The absence of shore birds greatly detracted from our experience at the beach. In addition to personally enjoying watching shore birds feed, we wanted my wife's grandchildren to view the feeding and to explain to them what they were seeing. Instead, we had to explain that dogs kept the shore birds from feeding there. Even more important than ruining our experience, the shore birds themselves suffer from being unnaturally forced from this area by non-native dogs.

Dogs also chase and otherwise harass birds that might show up briefly, causing them additional, unnatural stress and causing them to flee the area. Some of these birds are western snowy plovers, a species listed as "threatened" under the Endangered Species Act.

**Corr. ID:** 184873      **Organization:** *Not Specified*

**Comment ID:** 30887      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The most sensitive habitat areas, especially those with endangered or threatened species, should be entirely off limits to dogs. Dogs inevitably

will periodically (through negligence of the owner or the nature of being a dog) be removed from leashes. It will be much easier for law enforcement to simply keep dogs out of an area than try to pick between the leash-law abiding owners and the steadfast believers in leashless dogs. So, keeping them out of certain areas all together seems the only way to reasonably enforce maximum wildlife habitat values.

**Corr. ID:** 185102      **Organization:** *Not Specified*

**Comment ID:** 31074      **Organization Type:** Unaffiliated Individual

**Representative Quote:** A friend has related to me how on a weekly basis, she witnesses a professional dog walker release up to 6 dogs to run and chase each other and wildlife in Oakwood Valley, trampling and tearing up the host plant to the endangered Mission Blue Butterfly.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31545      **Organization Type:** Conservation/Preservation

**Representative Quote:** The Park Service's incident reports of off-leash dogs harassing shorebirds are voluminous. ( To list a few: on November 21, 2004, a Park Ranger witnessed a dog-owner throwing a ball for his off-leash dog at Ocean Beach, which promptly ignored the ball but "started running after [a] bird instead, causing the bird to fly away." See ex. 97. On October 26, 2004, a Park Ranger witnessed an off-leash dog run through a group of shore birds "multiple times, causing the birds to scatter, without the owner noticing." See ex. 98. On January 22, 2002, an off-leash Golden Retriever growled and barked at a horseback rider, and then chased birds off the beach. See ex. 99. On January 9, 2004, an off-leash dog jumped into the Sutro Baths and began chasing after a bird, which had to take flight to avoid being caught by the dog. See ex. 100. And on October 10, 2004, a small off-leash dog chased a shorebird at Ocean Beach for approximately 50 yards. When the dog returned to his owner the dog received a treat. See ex. 101. It is unclear if the dog received the treat for chasing the bird or for returning to its owner. ) For example, on February 1, 2005, during the snowy plover's residence at Ocean Beach, a Park Ranger witnessed an off-leash dog running along the high tide mark and "chasing birds from the flotsam as it went along." See ex. 102. The Park Ranger contacted the owner of the dog, and after ascertaining that the owner was providing false information to him, informed the owner that the park had "concerns with pets off-leash within the Snowy Plover habitat area" and proceeded to write the dog owner a ticket. The dog owner then became "belligerent" and claimed that the Park Ranger was only issuing the citation "because [the dog owner] is Korean." Id.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31543      **Organization Type:** Conservation/Preservation

**Representative Quote:** These impacts are exceptionally acute to shorebirds such as the federally listed Pacific Coast distinct population segment of the western snowy plover ("snowy plover"). The snowy plover is a diminutive shorebird that is in a race against extinction. It is believed that fewer than 2,000 adult birds remain in this population. U.S. Fish and Wildlife Service, Western Snowy Plover Pacific Coast Population Draft Recover Plan, p.7 (2001) (available at <http://pacific.fws.gov/ecoservices/endangered/recovery/snowyplover/>) (hereinafter "Recovery Plan"). However, despite the fact that potential nesting habitat for the snowy plover exists in the GGNRA; despite the fact that between 20 and 85 snowy plovers reside at Ocean Beach during the winter; and despite the fact that snowy plover nests have been found on private lands north and south of the park's boundaries, no snowy plovers are believed to be nesting within the Park. GGNRA, Draft Snowy Plover Management Plan, Ocean Beach, San Francisco, p. 14, 48 (1998). Ex. 96. While pre-nesting activity has occurred at Ocean Beach, the nests have all failed, most likely because of the "intense level of recreation activity on the beach." Id. at 48. Of these recreational activities, "unleashed pets represent the most significant recreational threat to wintering snowy plovers . . . because of the prolonged and repeated

disturbance created when they chase birds." Id. at 21.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31546      **Organization Type:** Conservation/Preservation

**Representative Quote:** Unfortunately it is not only shorebirds that are being impacted by roaming off-leash dogs. The highly imperiled mission blue butterfly, and the habitats upon which the species depends, are also being impacted by off-leash dogs. See ex. 104. Protected marine mammals are regularly harassed and even bitten by off-leash dogs, and the endangered tidewater goby, as well as imperiled salmon, are also believed to be impacted by off-leash dogs. 67 Fed. Reg. 1428.

**Corr. ID:** 187678      **Organization:** *Not Specified*

**Comment ID:** 31579      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Dog waste is less likely to be cleaned up when dogs are off-leash, and it is a highly undesirable augmentation to the landscape, from a recreation as well as ecological point of view. Anecdotal information suggests that nitrogen impacts can change grassland species composition in ways that have a negative impact on dependent species like endangered butterflies (Chui 2005).

**Corr. ID:** 187686      **Organization:** *Not Specified*

**Comment ID:** 31601      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Biological Conservation 101 2001) 315-325  
[www.elsevier.com/locate/biocon](http://www.elsevier.com/locate/biocon)

Disturbance to wintering western snowy plovers

Kevin D. Lafferty\*

USGS, Western Ecological Research Center, c/o

Marine Science Institute, University of California, Santa Barbara, CA 93106, USA

Abstract

In order to better understand the nature of disturbances to wintering snowy plovers, I observed snowy plovers and activities that might disturb them at a beach near Devereux Slough in Santa Barbara, California, USA. Disturbance (activity that caused plovers to move or fly) to wintering populations of threatened western snowy plovers was 16 times higher at a public beach than at protected beaches. Wintering plovers reacted to disturbance at half the distance (□40 m) as has been reported for breeding snowy plovers (□80 m). Humans, dogs, crows and other birds were the main sources of disturbance on the public beach, and each snowy plover was disturbed, on average, once every 27 weekend min and once every 43 weekday min. Dogs off leash were a disproportionate source of disturbance. Plovers were more likely to fly from dogs, horses and crows than from humans and other shorebirds. Plovers were less abundant near trail heads. Over short time scales, plovers did not acclimate to or successfully find refuge from disturbance. Feeding rates declined with increased human activity. I used data from these observations to parameterize a model that predicted rates of disturbance given various management actions. The model found that prohibiting dogs and a 30 m buffer zone surrounding a 400 m stretch of beach provided the most protection for plovers for the least amount of impact to beach recreation.

### ***TE6000 - Threatened and Endangered Species: Cumulative Actions and Effects***

**Concern ID:** 12455

**CONCERN STATEMENT:** Commenters want NPS to evaluate the cumulative effects on threatened and endangered species as a result of actions occurring on lands outside of GGNRA.

**Representative  
Quote(s):**

**Corr. ID:** 187678      **Organization:** *Not Specified*

**Comment ID:** 31576      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Two of the federally endangered species found in the Natural Areas, red-legged frogs and San Francisco Garter snakes, may be predated by feral cats.

**VC1010 - Affected Environment: Impacts to multiple resources**

**Concern ID:** 12456

**CONCERN  
STATEMENT:**

Commenters state that off leash dogs have negative impacts to multiple natural resources including wildlife, plants, and soils.

**Representative  
Quote(s):**

**Corr. ID:** 184335      **Organization:** *Not Specified*

**Comment ID:** 31415      **Organization Type:** Unaffiliated Individual

**Representative Quote:** It is my belief that scientific study will reveal that the practice of off leash dog recreation in our parks is not compatible with use by other people. The intensity of the off leash use with the shouted commands (frequently ignored by the dogs), the dogs fighting, the roving pack mentality, the flushing of wildlife, the excrement and urine deposited, the frenetic ball chasing or frisbee retrieval, the digging in sand and dirt, the barking, the unwanted physical contact between dogs and other people, the aggressive behaviors, the yowling, the territorial behaviors, the leash entanglements, the high speed collisions with unsuspecting pedestrians, the unpleasant social encounters with self-righteous dog owners willfully ignoring rules, the sense of uncertainty as to the dogs intentions, the presence of dogs whose breeding history involves fighting or killing, dog guardians who don't have the capability to control their dogs due to physical limitations, etc., All of these impacts and more need to be considered before any allotment of park lands is made to accommodate this use.

**Corr. ID:** 184996      **Organization:** Nature in the City

**Comment ID:** 29442      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Irresponsible dog guardians permit their dogs to negatively impact myriad natural resources including chasing birds, digging up geologic resources, causing erosion of native soils, trampling rare plants, and creating a scale of HIGH disturbance in which wildlife are unable to live and evolve in a healthy state within the current local ecological framework.

**Corr. ID:** 185107      **Organization:** *Not Specified*

**Comment ID:** 30961      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Off-leash dogs have adversely impacting the plants and wildlife in the park. I have seen off-leash dogs in restoration areas many times, trampling native vegetation, and sometimes chasing after birds.

**Corr. ID:** 185440      **Organization:** *Not Specified*

**Comment ID:** 30916      **Organization Type:** Unaffiliated Individual

**Representative Quote:** NPS must recognize that there is a conflict between protection of wild plants and animal habitat and use of the same area for offleash/offtrail dog walking. The wild plants and animals will eventually be gone from these areas. A finding that there is no conflict would be dishonest and unscientific. NPS must recognize that wild plants and animal habitat will be gone from areas where offleash/offtrail dog walking is allowed -- and should only allow offleash/offtrail dog walking if it is possible to design, locate and limit those areas so that the overall impact on wild plants and animals is insignificant.

Wild animals such as the rabbits and quail that could be seen at Fort Funston about 10 years ago are no longer there -- if offleash/offtrail dog walking is limited, these wild animals will return. NPS must adopt a plan to restrict the area of dog impacts so this can happen.

**VC11000 - Affected Environment: Species Of Special Concern**

**Concern ID:** 12551

**CONCERN STATEMENT:** Commenters state that the NPS must establish measures to protect and preserve species of special concern and their habitat.

**Representative Quote(s):** **Corr. ID:** 184931 **Organization:** *Not Specified*  
**Comment ID:** 30988 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** It is crucial that the Dog Management Plan and the EIS include each of the following points:  
-Acknowledge the importance of the GGNRA as a migratory bird corridor in the Pacific Flyway.  
-Analyze carefully past, present and future impacts of dogs to wildlife and habitat in the GGNRA.  
-Establish measures to protect and preserve wildlife and habitat for future generations to enjoy. In particular, the National Park Service must maximize protections for special-status species such as the Bank Swallow, Western Snowy Plover, Northern Spotted Owl and Brown Pelican.

**Corr. ID:** 184944 **Organization:** *Not Specified*  
**Comment ID:** 29944 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** It's vital that species such as Bank Swallow, Western Snowy Plover, Northern Spotted Owl and Brown Pelican get adequate protection from off leash dogs to nest, forage and thrive.

**VC11110 - Affected Environment: Impacts to lands and parks surrounding GGNRA**

**Concern ID:** 12458

**CONCERN STATEMENT:** Commenters state that NPS must consider the impact to the local community and city parks if dogs are no longer permitted in GGNRA.

**Representative Quote(s):** **Corr. ID:** 185450 **Organization:** *Not Specified*  
**Comment ID:** 31282 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** The EIS should consider the effects that concentrating off-leash dogs in small areas has, as opposed to allowing the same number of off-leash dogs to spread out over larger areas. What impact does forcing thousands of dogs to be in a relatively small area have, especially when compared to having that same number of dogs allowed in a much larger area? In what ways has the GGNRA exacerbated any impacts from off-leash dogs because of its policy limiting off-leash dogs to small areas?

The EIS should consider the impact on the environment around the GGNRA of banning off-leash dogs, especially the impact on San Francisco city parks if all the dogs banned from the GGNRA are forced to walk in city parks instead. Again, the issue of concentrating off-leash dogs in the significantly smaller areas in city parks needs to be considered. The same number of dogs who are spread out over the off-leash areas in the GGNRA with little impact might have much more significant

impacts when forced onto a much smaller area in a city park. Also, consider the environmental impact of people being forced to drive all over the city to take their dog to a park with an off-leash area. This is especially true for neighbors who walk their dogs at Ocean Beach (and walk to the beach from their homes), where there are no nearby parks with of leash access.

**VC6000 - Affected Environment: Marine And Estuarine Resources**

**Concern ID:** 12448

**CONCERN STATEMENT:** Commenters state that dogs negatively impact marine and estuarine resources.

**Representative Quote(s):** **Corr. ID:** 185237 **Organization:** Not Specified

**Comment ID:** 29433 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Is there an effect from dog urine and feces deposits on water quality in the Bay, especially in those areas considered parkland public beach? Are there potential human health issues that may arise near or long term? Are there potential negative effects on the aquatic life of the Bay within 1000 feet of the beach? 7.What is the Park's mandate in terms of protecting marine resources within 1000 feet of the Park? What is the Park's mandate with regard the Golden Gate Biosphere Reserve? Does allowing dog walking or off leash dogs in certain areas fit into the requirements of those mandates?

8.Establish studies and measurements that will take place to describe the health of the Bay within 1000 feet of the parkland and set benchmarks for desired health. What will be the ongoing monitoring process to see that the Bay is healthy? What agencies are involved in such monitoring to ensure compliance? How will long term monitoring be funded and managed?

9.Investigate the ultimate effect of sending all the dog feces collected in park garbage cans to the SF landfill. Does the feces leech through the bag and continue to pollute the ground water and the Bay? Is the Park contributing further to the erosion of the water health of the Bay and Ocean by enabling dogs to use parklands? What are the agencies concerned with the water quality of the Bay and what is their position on the Park's role in maintaining good water quality? What is the Park's legal liability if any?

**VC9000 - Affected Environment: Vegetation**

**Concern ID:** 12444

**CONCERN STATEMENT:** Commenters believe that dogs cause damage to park vegetation.

**Representative Quote(s):** **Corr. ID:** 184294 **Organization:** Not Specified

**Comment ID:** 31126 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I have seen dogs running through the fenced area adjacent to the Marsh, and digging up and destroying planted areas in search of underground rodents. Their masters are unable to prevent such activity notwithstanding what are often very vociferous vocal efforts to control their animals. Inevitably, the resulting damage is costly in terms of time, effort and money by the park in making repairs.

**Corr. ID:** 185331 **Organization:** Not Specified

**Comment ID:** 30747 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Dogs destroy plants. We volunteers are maintaining vegetation in NP. We plant native plants and grow them little by little. These volunteers support help to maintain the national park and the services. However, the

young native plants which NP staff plant are destroyed by unleashed dogs. The dogs are running everywhere and they don't care. After dogs running, the fields that we planted were a mess.

**Concern ID:** 12446  
**CONCERN STATEMENT:** Commenters believe that dogs are not the cause of damage to park vegetation.

**Representative Quote(s):** **Corr. ID:** 185055 **Organization:** *Not Specified*  
**Comment ID:** 29647 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** The major environmental impacts to the park do not come from dogs or people but from nature in the form of invasive non-native species and erosion.

### ***VE4050 - Visitor Experience: Impacts of No Action/Current Conditions***

**Concern ID:** 12432  
**CONCERN STATEMENT:** Commenters state that allowing dogs in GGNRA has a positive impact on members of the surrounding communities.

**Representative Quote(s):** **Corr. ID:** 184838 **Organization:** *Not Specified*  
**Comment ID:** 31053 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** I have lived in San Francisco for 30 years. For over 20 years here I have owned a dog. For the entirety of that time I, along with friends and my partner have enjoyed taking our dog to Fort Funston beach, GGP, or Ocean Beach to walk the beach or park, play ball with our dog, bask in the sun, picnic, socialize with other visitors, both those with or without dogs, and enjoy the scenic beauty we find in these places. We have always found a wide diversity of people at the beach when we have visited, usually on weekends: families, couples, individuals of all ages, those with dogs and those without. Never in the 20 years I have been visiting Fort Funston, GGP or Ocean Beach have I encountered or seen any conflict whatsoever between people or between dogs. The magic of Fort Funston is that all who spend time at the beach enjoy the surroundings and the diverse community of people who may be there at any given time. I have believed that the diversity of people at these parks, including their dogs, brings out the very best in all of us.

In a city like San Francisco we are blessed with a few recreational areas sufficiently large to promote a sense of "community". People visiting a park on a weekend have a shared purpose of enjoying the environment, getting the exercise of hiking throughout the area, playing with their children, their dogs and one another, having picnics, working on sun tans, having a beautiful and refreshing place to sit and think...the entire experience is refreshing because it takes away from the intensity of our urban lives.

San Francisco is somewhat unique in that a very high percentage of residents have dogs...having dogs embellishes our humanity and civility, takes the edge off the stress that comes with living in a high-density urban setting, gets us out of the house and on the sidewalks in our neighborhoods where we walk our dogs and meet one another. We do the same when we visit Fort Funston, GGP or Ocean Beach.

In short, the realities of our lives in San Francisco and the prevalence of dogs amongst us is such that our use of our public lands that make the quality of our lives here so pleasurable cannot be taken from us. To do so would materially degrade the quality of life in this City.

**Corr. ID:** 185088      **Organization:** *Not Specified*

**Comment ID:** 31368      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As to the scope of the EIS, I would like to see strong consideration of the social and cultural impacts of off-leash recreation on the Bay Area populace, including the health-promoting effects of frequent walks in nature, the community- building effects of people from diverse backgrounds connecting each and every day in the otherwise cold environs of a city, and the life-affirming effects of off-leash recreation on the elderly and disabled, many of whom rely on their dogs to get them out of the house

**Corr. ID:** 185450      **Organization:** *Not Specified*

**Comment ID:** 31286      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The EIS has to consider the cultural resource of the community of people who walk dogs. Walk in Fort Funston early in the morning and you will see many seniors and disabled people with dogs. In the middle of the day, women and seniors feel safe walking there because of the presence of all the dogs and the people with the dogs. I have heard mothers with young children say they bring their kids to Crissy Field specifically so the kids can see and play with all the off-leash dogs there. At any time at Fort Funston or Crissy Field or Ocean Beach or elsewhere in the GGNRA, and you will see people from every different community in San Francisco walking dogs - seniors, kids, teens, adults, singles, married couples, gays, straights, and people from every ethnic, religious, racial, economic and social class- all walking, talking, and laughing together. Where else do you see that mix?

**Concern ID:**

12437

**CONCERN STATEMENT:**

Commenters believe the presence of dogs has a positive effect on visitor experience.

**Representative Quote(s):**

**Corr. ID:** 184882      **Organization:** *Not Specified*

**Comment ID:** 30993      **Organization Type:** Unaffiliated Individual

**Representative Quote:** There are numerous (too many too list) cultural and social benefits to allowing dogs off leash. For example, it is important to consider the diversity of people who own dogs and the diverse reasons they own them. Many people with mental health disabilities rely on dogs as companions and care takers. Children who grow up around dogs learn to love them rather than fear them. Additionally, dog walking is an important social activity for myself and many others (again, people with different family sizes, nationalities, and economic backgrounds own dogs). Interacting over a dog is a universal language, an easy way of connecting and bringing people together.

**Corr. ID:** 184981      **Organization:** PEF

**Comment ID:** 30863      **Organization Type:** Unaffiliated Individual

**Representative Quote:** *Diversity:* Off-leash dog walking brings a great diverse group of people. I'm a middle-aged white person and while walking my dogs I have had long conversations with people of all races and ages. Nothing else has brought me together with such a diverse group.

*Loneliness and depression:* Walking my dog off leash helps to cure both. It brings joy to see happy dogs. Dog walkers tend to be friendly and you have an immediate bond. When dogs are on leash, you don't tend to stop and talk with others much, because the dogs get impatient and the leashes get tangled.

**Corr. ID:** 185009      **Organization:** *Not Specified*

**Comment ID:** 30858      **Organization Type:** Unaffiliated Individual

**Representative Quote:** When the sun is shining, there are hundreds of happy families and dogs at Fort Funston and it is a wonderful sight to behold; out-of-town visitors marvel at what a fantastic place it is and they're not talking about the native plants. When the rain is pouring and the wind is howling, when the hang-gliders, environmentalists and Rangers are sitting warm in their homes, I am out there with Robin, along with a small hard-core band of dog-lovers to whom this often inhospitable place is heaven on earth. It's the peoples' land and we have every right to enjoy this area the way people have for decades, its loss would be a truly terrible and traumatic thing.

**Corr. ID:** 185343      **Organization:** *Not Specified*

**Comment ID:** 31049      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Within the first month of taking my dogs to Fort Funston my CD4 cells went up by 100 and within the first 6 months I gained weight and soon found myself in better physical condition than I had been for two years. My doctor then prescribed it for me and I told him so long as I had my dogs I would remain in good physical and emotional shape. That has remained true. But only because I have access to Fort Funston 5 times a week.

I also, for the first time since my diagnosis started to come out of a clinical depression, not only because of my companion dog, but because of the wonderful social climate I found among the Fort Funston Dog Walkers Association, which I joined the day I heard about it from Lee Walker.

What we're saying to you is that Fort Funston has not only prolonged our life, but improved our quality of life because we can go there with our dogs and let them off leash so they can be real dogs and run and get the exercise they need. It fills our heart, conditions our body, and literally keeps us wanting to live. Please, on behalf of senior citizens and people with HIV/AIDS from San Francisco to the South Bay, keep Fort Funston an off-leash area for dogs. For many of us it is the only place we have to keep body and soul together, the only place we have where we feel fully a part of the community

**Corr. ID:** 185417      **Organization:** *Not Specified*

**Comment ID:** 30651      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Under your EIS, please consider all the benefits to the many, many people who use Fort Funston to run and walk dogs off leash. I have taken many family members and friends there over the years, and see many other people doing that as well. I take my young son there - he loves to watch the dogs. Dogs are good for children! And so is the exercise and the beauty of the ocean.

**Concern ID:**  
**CONCERN**  
**STATEMENT:**

12441

[Commenters state the presence of dogs negatively impacts visitor experience.](#)

**Representative**  
**Quote(s):**

**Corr. ID:** 184862      **Organization:** *Not Specified*

**Comment ID:** 30817      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I have 3 children who were so frightened by dogs on the Fort Funston steps that they refuse to go there any more. Dogs run in packs and bark at them because the trails are narrow. Also, we used to go to Crissy Field very often on warm days to play in the sand. We don't go any more now that there are so many dogs running around. The off leash dogs on GGNRA land has greatly impeded our use and enjoyment of these beautiful spaces. It is a shame to be raising 3 young San Franciscans who do not feel they can safely enjoy our greatest natural treasures.

**Corr. ID:** 185233      **Organization:** *Not Specified*

**Comment ID:** 29383      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The noise factor is another problem that no one seems to mention. The barking that many dogs engage in disturbs the peace and quiet one is looking to achieve when walking in a park to enjoy nature.

**Corr. ID:** 185233      **Organization:** *Not Specified*

**Comment ID:** 29381      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The vast majority of people do not get their dogs trained and therefore really cannot control their dogs by voice alone. Public space should be a pleasant experience for all and if you are constantly trying to dodge dogs running at you as your walking along it is not much fun.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31533      **Organization Type:** Conservation/Preservation

**Representative Quote:** Off-leash dogs in the GGNRA create other considerable dangers to people and otherwise ruin their park experiences. There are at least two reports of unleashed dogs creating serious traffic hazards by running onto roads, endangering the animals and causing drivers to swerve in order to avoid hitting them. Ex. 72, 73. There were also two complaints of unleashed dogs potentially causing harm to disabled people. Ex. 11, 74. There was one complaint that an unleashed dog urinated on a visitor's "belongings" (Ex. 35), complaints of unleashed dogs attempting to take food or otherwise disturbing meals (ex.. 57, 69, 4, 15, 75), and a complaint that the presence of unleashed dogs in or near water prevents people from fishing (ex. 76).

**Corr. ID:** 184932      **Organization:** Safe parks for kids

**Comment ID:** 31952      **Organization Type:** Unaffiliated Individual

**Representative Quote:** User Conflicts: There is a serious conflict between dogs taking over beaches, and the public's use of the beach. It is very difficult to enjoy a beach, especially with your small children, when dogs are running off leash. How many people can enjoy Crissy Beach when there are literally hundreds of dogs running on the beach. Very few try, and most leave. If dogs were not allowed on Crissy Beach, that beach would be packed with people enjoying the beach. Dog owners have completely taken over this beach and turned it into a dog run. It is one of the best beaches in the bay, since it is protected from the wind, and high waves.

Enjoyment for future generations: If dogs continue to be allowed on the beaches in GGNRA, my children will never know the pleasure of visiting a beach and relaxing. They will also never see available wildlife on the beaches.

### ***VE4060 - Visitor Experience: Role of Park in Providing Visitors an Experience of Areas where Dogs are Not Allowed***

**Concern ID:** 12426

**CONCERN STATEMENT:** Commenters believe the GGNRA should provide visitors with the opportunity to experience dog free areas.

**Representative Quote(s):** **Corr. ID:** 185030      **Organization:** *Not Specified*

**Comment ID:** 31621      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Furthermore, there is no place in San Francisco that people can go and be sure that they can have either a no-dog or dog-on-leash experiment. Nearly the entire coastline of San Francisco's west and north shores are under federal management, yet almost none of the beaches are accessible to those who wish or need to be free from the interference of off-leash dogs. The park must provide this experience, because city parks simply aren't doing an adequate job of it.

**VR2050 - Vegetation and Riparian Areas: Impacts of No Action/Current Conditions**

**Concern ID:** 12630

**CONCERN STATEMENT:** Commenter stated that the only area where a wide variety of native plants are found is in fenced areas.

**Representative Quote(s):** **Corr. ID:** 184932 **Organization:** Safe parks for kids

**Comment ID:** 31955 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Conservation: The only areas that we see a good variety of native plants in the fenced in portions of the park. We shouldn't have to fence in native areas, just to allow off leash dog walking.

**VR5000 - Vegetation and Riparian Areas: Cumulative Actions and Effects**

**Concern ID:** 12425

**CONCERN STATEMENT:** Commenters state that NPS has to consider all cumulative impacts of other actions on GGNRA vegetation and riparian areas.

**Representative Quote(s):** **Corr. ID:** 187678 **Organization:** Not Specified

**Comment ID:** 31577 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As stated in our introduction, fragmented urban landscapes present special problems (Primack 2004, Newman 1993). Based on biogeographic theory, they are inherently unstable (McCullough 1996) and susceptible to invasion (Soule 1980). There is a natural trend of species loss in these fragmented parks. In fact, about 50% of the plants recorded in the 1958 Flora of San Francisco California (Howell et al. 1958) have gone extinct from San Francisco according to the plan.

**Corr. ID:** 187678 **Organization:** Not Specified

**Comment ID:** 31591 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Balboa Natural Area -- 6.22  
The Natural Area includes an elevated boardwalk, trail connections to GGNRA, a diverse fore dune plant community, and suitable habitat for dune-dependent animals. The soils are primarily sand. increased and more sustainable populations of sensitive plants Augmenting native plants will accomplish this: the area has already had some sensitive species successfully re-introduced. Trampling by people and dogs must be prevented.

**VS2000 - Visitor Conflicts And Safety: Methodology And Assumptions**

**Concern ID:** 12422

**CONCERN STATEMENT:** Commenters state that NPS must accurately identify the scope of user conflicts

**Representative Quote(s):** **Corr. ID:** 185427 **Organization:** Not Specified

**Comment ID:** 31935 **Organization Type:** Unaffiliated Individual

**Representative Quote:** If safety is a consideration for any of the NEPA alternatives, it is important to identify the true scope of user conflicts so dog-related conflicts can be put into perspective. It is one thing to say that there are 100 dog-related conflicts; it is quite another if the context is that there were 900 non-dog related conflicts in the same period.

The study should also include alternatives to an outright ban. Increase the fine for dogs which go over the cliffs and must be rescued; increase the signage and other education so that visitors know how dangerous the cliffs are now.

Finally, regarding safety, consider how unsafe some of these GGNRA areas would be if there were no voice-control dogs and their owners. These are urban parks, with all of the problems that brings. If safety is to be considered, it is only fair to consider all aspects of this problem.

**Corr. ID:** 185421      **Organization:** Crissy Field Dog Group

**Comment ID:** 32033      **Organization Type:** Recreational Groups

**Representative Quote:** 17) Safety is always a concern for every visitor and park employees-in order to achieve the planning goal to "reduce visitor conflict", identify all current user conflicts and factors contributing to these conflicts.

**VS4050 - Visitor Conflicts and Safety: Impacts of No Action/Current Conditions**

**Concern ID:** 12449

**CONCERN STATEMENT:** Commenters believe that the presence of dogs increases visitor safety.

**Representative Quote(s):**

**Corr. ID:** 184928      **Organization:** *Not Specified*

**Comment ID:** 30801      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 2. Availability of off-leash areas makes the city safer and more comfortable for people who do not care for dogs.

Virtually any dog is more aggressive when on the leash. This is true because they feel trapped and therefore vulnerable, and because they feel a stronger need to defend their owner. Thus, percentage wise, attacks and other bad behaviors are more likely to come from leashed than unleashed dogs.

If owners don't have the incentive of off-leash parks, they are much more likely to simply walk their dog in their own neighborhood. All else equal, this increases the likelihood of attacks and of dog feces on walkways and other public areas because more dogs are walked in the neighborhood. In addition, because dogs will not be as well exercised and socialized, they are much more likely to have behavioral problems and be more prone toward aggressive behavior.

**Corr. ID:** 184938      **Organization:** *Not Specified*

**Comment ID:** 30769      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Whenever I am out in the Presidio or Crissy Field, safety is of utmost importance to me. I believe that banning or further limiting off leash dogs will have a negative impact on park safety. A well- used park is a safe park. Seniors and women, in particular, are often reluctant to walk alone in parks because of fears of muggings or rapes. The presence of people with well-behaved dogs off leash discourages rapists, muggers, homeless people and drug dealers from hanging out in parks. Many people, especially women like myself and elder folks, walk in the GGNRA precisely because there are so many people with off leash dogs there. The dogs provide a valuable sense of safety and security.

**Corr. ID:** 185295      **Organization:** *Not Specified*

**Comment ID:** 31409      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Not so long ago Ft. Funston was a dangerous area with drug and sexual activity in public. The dog people who began using the area helped discourage this activity.

**Concern ID:** 12450

**CONCERN STATEMENT:** Commenters point out that other uses besides dog walking negatively impact visitor experience.

**Representative Quote(s):**

**Corr. ID:** 184804      **Organization:** *Not Specified*

**Comment ID:** 31004      **Organization Type:** Unaffiliated Individual

**Representative Quote:** First, when I hike, it is critical for me that the experience be with nature. When bikes or any other mechanical devices are allowed on unpaved trails, there is conflict. If I am on the trail, and only one biker comes leisurely peddling through, that is one thing. However, the usual experience is a frantic shout that breaks my experience, "BIKES COMING!" and with that, I had better get out of the way pronto. It's not just one or two bikes; it can be a train of 15 to 20 or more who speed by me, maybe even annoyed that I am on the trail. If there is poison oak, or other reasons for my not moving fast enough off the trail, I am seen as a problem. Please consider banning any type of bike or mechanized device from anything other than paved trails.

**Corr. ID:** 185185      **Organization:** *Not Specified*

**Comment ID:** 30842      **Organization Type:** Unaffiliated Individual

**Representative Quote:** We are concerned about all the possible hazards at Crissy Field; we have almost been run over by speeding cyclists and regularly have to dodge runners on the path to get to the sand. When the wind surfers show up they show up in mass with boards and kites creating obstacles that cover the grass down to the beach. When families leave after spending time with their children the beach is covered with lost toys, shoes and other trash including food wrappers. This seems just as bad for the environment as dog waste left behind by the few thoughtless dog owners who might visit the park. Most people clean up after themselves whatever trash might be created while they are there; dog waste, food wrappers, dirty diapers, etc.

**Corr. ID:** 185349      **Organization:** *Not Specified*

**Comment ID:** 30968      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 2. As a long-time off-leash dog-walker (several decades) on Crissy Field and the Crissy Field Beach, I have NEVER had a seriously unpleasant incident with another person's off-leash dog. One of my smaller dogs, however, was kicked on purpose by a runner who objected to her presence even though she was old and walking quietly next to me.  
3. Far more dangerous to pedestrians (with or without dogs) are the bicyclists who ride FULL SPEED down the Promenade and on the trails crossing the field.  
4. Also FAR more dangerous to pedestrians on the beach are those Kite-Surfers who have not had the experience to control their kites which occasionally swoop down on the beach-walkers. One of my earrings was actually whipped off by one of those out-of-control kites and when I ran into the owner further down the beach 15 minutes later, he said casually, "You were lucky you didn't get seriously hurt:" and never even apologized.

**Concern ID:**  
**CONCERN STATEMENT:**

12452  
Commenters believe that off leash dogs at times interfere with the ability of other visitors to enjoy their use of the park.

**Representative Quote(s):**

**Corr. ID:** 184960      **Organization:** *Not Specified*

**Comment ID:** 30932      **Organization Type:** Unaffiliated Individual

**Representative Quote:** SAFETY AND QUALITY OF LIFE  
Another issue that is often ignored or glossed over by some dog owners is the fact that many people are uncomfortable around dogs. Dog owners I have talked to seem to think that there is something wrong with anyone that has any fear of dogs, but of course we all know here in San Francisco that dogs can at times be dangerous or even lethal. I have no personal fear of dogs myself, but my wife is very uncomfortable around strange dog and when we have been confronted in a park by an off-leash dog she becomes very anxious. This alone is reason enough to have all dogs leashed in any

open area that is accessible to the general public. A person goes to a park to relax and enjoy nature and confronting a strange dog can destroy that experience in an instant. I have been challenged by territorial dogs on park trails and had owners tell me that the dog is "just saying hello." I do not blame the dog but I do blame the incredibly callous dog owner. That particular incident sent my wife off in the opposite direction and ruined her entire afternoon. That is not what a park experience is supposed to be like and one that would not be tolerated in any other National Park. I have talked to people that have attempted to take their children to some of our GGNRA beach areas and had to leave because of the child's understandable fear of dogs. This intolerable situation has been going on far too long!

**Corr. ID:** 185061      **Organization:** Safe Parks Advocates

**Comment ID:** 29203      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Pets carry diseases. Dogs are instinctive animals. Voice control is never absolute. This is a very important point that explains why every Park needs signs stating that no dogs are allowed in children's play areas. Additionally, humans of any age deserve a large pee & poop-free park to lie in, tumble in, run on and play games and enjoy nature. We urban humans clearly have a right to have some natural areas where we and our children can develop our gross motor skills and our appreciation of nature...the scent of grass and the sound of birds in the trees etc. There is nothing more precious to a child than being able to run, roll and lie in nature, daydream and look up at the clouds as they drift by in beautiful, different patterns. With off-leash dogs everywhere, that basic human right is violated. It is a matter of healthy development and health maintenance as well, because this is the first time in human history that, worldwide, more people live in urban areas than in countryside. Scientific studies show clearly that we humans need green natural spaces to remain physically and mentally healthy. Immeasurable large numbers of young children are being massively compromised both mentally and physically because of dogs off leash in their environments.

**Corr. ID:** 187667      **Organization:** *Not Specified*

**Comment ID:** 31489      **Organization Type:** Conservation/Preservation

**Representative Quote:** The NEPA process must also include assessment of the exclusionary nature of off-leash dog-walking, particularly on the disabled and those with guide dogs, and explain how any area where dogs will be permitted to roam off-leash are not public places subject to the Americans with Disabilities Act and other access laws. In addition, the environmental and recreational destruction at the park must be fully assessed.

**Concern ID:**

12454

**CONCERN STATEMENT:**

Commenters believe that off leash dogs pose risks to their physical safety.

**Representative Quote(s):**

**Corr. ID:** 184865      **Organization:** *Not Specified*

**Comment ID:** 30973      **Organization Type:** Unaffiliated Individual

**Representative Quote:** There is also a problem with dog feces on the beach. Whether dogs are leashed is not relevant to this problem; instead, some dog owners are not cleaning up after their pets, regardless of whether they are leashed. While this problem is nowhere near as widespread as the problem with off leash dogs, I have spotted dog feces on the beach on several occasions. This is a very negative experience for everyone visiting the beach, including me, and is also a potential health hazard.

Also, during this visit to Ocean Beach, I was at the water with my wife's grandchildren who were six and eight years old, respectively. A dog was fetching a ball near us, and the dog was virtually running over people to get it. This created a danger to everyone,

especially the young children in the area, such as my wife's grandchildren. In a worst case scenario, a young child in the water could be knocked over by a dog and drowned. Even without a physical touching occurring, a dog running wildly like the one I described caused us fear and apprehension, as we had to constantly watch that the grandchildren were not knocked over.

**Corr. ID:** 185214      **Organization:** *Not Specified*

**Comment ID:** 29891      **Organization Type:** Unaffiliated Individual

**Representative Quote:** When you have small children, as we do, it is not a 'philosophical' issue about appropriate park usage, but the fact that we don't want our children at risk of confrontation with unsafe dogs.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31527      **Organization Type:** Conservation/Preservation

**Representative Quote:** Off-leash dogs, often playfully, jump on people who do not wish to experience that physical contact. In one incident, a woman received a broken arm from being jumped on by an off-leash dog at Fort Point. Ex. 14. Another park user was jogging at Fort Point when an off-leash dog suddenly darted in front of him, causing him to come "crashing down" onto his left hip and both kneecaps. The dog's owner was 25 feet away at the time. Ex. 3. These incidents point out the fact that even "friendly" dogs can cause serious injuries if they are not leashed, as there is no evidence that these dogs meant any harm or were acting in a vicious manner.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31526      **Organization Type:** Conservation/Preservation

**Representative Quote:** Persons walking leashed dogs have been knocked down by unleashed dogs attacking leashed dogs, sometimes causing injury. (Ex. 6 (off-leash dogs knock over person walking leashed dogs), 13 (man knocked down twice by attacking off-leash dogs). ) A man who regularly walks his leashed dogs at Crissy Field was knocked down by off-leash dogs attacking his leashed dogs, injuring his knee. Ex. 13. On a separate occasion while walking his leashed dogs, the same man was knocked down again by attacking off-leash dogs. Id.

Three persons with leashed dogs were bitten by off-leash dogs that attacked their leashed dogs. (Ex. 92 (man and wife walking leashed dogs bitten by off-leash dog attacking the leashed dogs); 24 (woman bitten by one of two off-leash dogs that attacked her leashed dog.) A husband and wife were walking their dog on a leash along Milagra Ridge in the GGNRA when an off-leash dog "came out of the brush" and attacked the leashed dog. The husband was bitten in the upper thigh by the off-leash dog, and the woman was bitten in the finger. Ex. 92. Another woman was walking her leashed dog at Fort Funston when it was attacked by two off-leash dogs. The woman picked up her dog by the collar in an attempt to stop the altercation and was bitten on the leg by one of the attacking off-leash dogs.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31529      **Organization Type:** Conservation/Preservation

**Representative Quote:** Since 2000 alone, there have been dozens of complaints or reports of unleashed dogs frightening people by charging or growling at them. (See, e.g., ex. 38 (off-leash Boxer approached visitor and growled at her continuously); 39 (park visitor chased for over 100 yards by off-leash dog); 40 (large off-leash dog ran straight at naturalist); 41 (park user scared by off-leash dog barking at him); 42 (victim frightened by 40 dogs, almost getting "taken out"); 43 (jogger charged by growling off-leash dog); 44 (park visitor approached "in a menacing way by large dogs"); 45 (off-leash pit bull ran up to children, ages two and five); 46 (park visitor "constantly frightened" by off-leash dogs); 47 (visitor felt life threatened by large off-leash dog); 48 (jogger approached by two large off-leash dogs that growled and barred their teeth

at him); 49 (off-leash dogs at Stinson Beach approached children with food, parent feared that dogs might bite children attempting to get food); and 50 (ranger chased by off-leash dog near Battery Davis). ) One Crissy Field visitor was almost attacked by an off-leash dog. A "handler" had to get between the victim and the dog to prevent the victim from being physically harmed. The victim felt that his life was threatened. Ex. 47. In another incident, a jogger at Fort Funston was approached by two large off-leash dogs that were 100 yards from their owner. The dogs growled and bared their teeth at the jogger. Ex. 48.

**Corr. ID:** 184932      **Organization:** Safe parks for kids

**Comment ID:** 31950      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Visitor experiences (Enjoyment of the park): Unleashed dogs make it very hard to visit beaches in GGNRA. The dogs scare and approach small children, walk across blankets, try to eat food, and shake off water near where people are sitting. Unleashed dogs seriously limit equestrian riding in the park. It is too dangerous to ride horses around dogs that are not familiar with horses. This is especially a problem with children riding horses and they cannot control a horse that spooked. A good example is the Pit Bull that chased the police officer in Golden Gate park. A child would probably have been killed. There is also a lack of natural wildlife for viewing in the park. Dogs routinely chase any bird, sea mammal, or other small animals in the park.

#### ***VS4060 - Visitor Conflicts and Safety: Aspects of Visitor Conflicts on Guide Dogs/ Service Dogs***

**Concern ID:** 12416

**CONCERN STATEMENT:** Commenters believe that off leash dogs negatively impact the experience of disabled visitors by interfering with trained service dogs.

**Representative Quote(s):**

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31534      **Organization Type:** Conservation/Preservation

**Representative Quote:** Off-leash dogs prevent individuals with service animals from using the GGNRA. Off-leash dogs pose a significant challenge to individuals who rely on service animals to help them enjoy the GGNRA. A 2003 survey conducted by a national guide dog user group indicated that 89% of individuals with service animals have had their guide dogs interfered with by off-leash dogs, and 42% of graduates have had their guide dogs attacked by off-leash dogs. Ex. 77. Because of this, organizations such as Guide Dogs for the Blind recommend that their graduates avoid any place where off-leash dogs are known to roam. Thus, the failure to enforce the leash law in the GGNRA has exposed those with service animals to a high-risk of interference or attack, and in most cases have precluded these individuals from enjoying the park altogether.

**Corr. ID:** 187672      **Organization:** Guide Dog Users Inc

**Comment ID:** 31553      **Organization Type:** Non-Governmental

**Representative Quote:** In a 2003 GDUI survey, 89% of guide dog handlers reported incidents of interference from unleashed dogs, placing these visually impaired individuals in serious danger. Even when an interfering pet dog simply wants to play, the team's attention to important elements of safe travel is distracted making the blind person vulnerable to the dangers of traffic and other environmental challenges. 42% of respondents have been the victims of attacks by unleashed dogs causing physical and psychological injury to both members of the team and even death or premature retirement of the guide dog which can cost more than \$50,000 to replace. GDUI supports the enforcement of leash laws in general because such laws provide important safeguards for people, our pets, wildlife, and parks. Enforcement of the National Park System's leash law would insure dogs have reasonable access to the Park

without jeopardizing the safety of disabled individuals partnered with specially trained assistance dogs, pet dogs, wildlife, or park visitors.

**VU1000 - Visitor Use: Guiding Policies, Regs And Laws**

**Concern ID:** 12409

**CONCERN STATEMENT:** Commenters believe the GGNRA must adopt an enforceable dog management policy which includes leash laws.

**Representative Quote(s):**

**Corr. ID:** 184864                      **Organization:** *Not Specified*

**Comment ID:** 30910                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The park MUST come up with an ENFORCED policy that allows dog owners some areas to run their pets off leash, but at the same time the park has been neglecting enforcing existing policies for areas where pets should have been on leash. Take a look at the Fort Mason meadow ANY TIME and see how many people comply with the posted regulation - in view of the superintendent's office! When my wife couldn't even get a Park Police officer out of their vehicle to follow up on a complaint about a dog off leash, when my daughter (who has worked for several vets and is very comfortable with pets) had to restrain a loose pit bull until we could get an LE officer to respond (by the time they did she had walked the dog back to the owners apartment in the Presidio and tied it up in their yard), when there are entire areas of the park we can no longer visit due to the irresponsible actions of some dog owners who seem to be more interested in their morning Starbuck's coffee and their cell phone conversations, rather than controlling their pets - well - it's a sad state of affairs.

Dog run areas SHOULD be available, and in my opinion should be fenced for the protection of other park visitors and wildlife. Consider these areas sacrifice zones, if necessary. But just as important - regulations need to be aggressively enforced as well for the protection of other park visitors and natural residents. Too many dog owners in San Francisco seem to think that their dog's rights supersede all others.

**Corr. ID:** 187673                      **Organization:** *Not Specified*

**Comment ID:** 31623                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please find attached several articles from the scientific literature discussing the impacts off-leash dogs pose on shorebirds such as the snowy plover, as well as two peer reviews of San Francisco's Natural Areas Program that find that the city parks are inadequately managing off-leash dogs to protect natural areas. These documents indicate that the GGNRA must choose an alternative that provides leash law enforcement, because city parks simply are not able or capable of providing on-leash recreation areas and wildlife protection zones. They further indicate that the best choice for pet management are black-and-white rules either permitting dogs on-leash or excluding them from areas in order to ensure enforceability and prevent abuse by irresponsible dog owners.

**Concern ID:** 12413

**CONCERN STATEMENT:** Commenters urge NPS to continue to allow off leash dog walking which has been a permissible form of recreation at GGRNA for many years

**Representative Quote(s):**

**Corr. ID:** 184976                      **Organization:** *Not Specified*

**Comment ID:** 31287                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As the owner of 2 dogs and a 22 yr. resident of SF, I strongly urge the GGNRA to allow off-leash dog walking to continue at Crissy Field, parts of the Presidio and fort Funston. These areas were designated in the late '70s as official off-leash areas and must remain so.

**Corr. ID:** 185404      **Organization:** *Not Specified*  
**Comment ID:** 29615      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** I believe I should be able to walk by dog off-leash at Fort Funston because that was the deal when you received the land.

**VU2000 - Visitor Use: Methodology And Assumptions**

**Concern ID:** 12634  
**CONCERN STATEMENT:** Commenters state that the EIS should consider visitor's actual actions as the baseline for existing conditions and further NEPA analysis.

**Representative Quote(s):** **Corr. ID:** 185445      **Organization:** *Not Specified*  
**Comment ID:** 31980      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** 4. Should consider the effect of enforcement as it would actually happen (e.g., dogs are off-leash where they are required to be "on-leash." Use observational assessment of what is actually happening now for existing NEPA condition)'same for other alternatives. Have to consider will be off-leash unless can enforce "on leash" rule in an area.

**VU4010 - Visitor Use: Actions of dog owners**

**Concern ID:** 12396  
**CONCERN STATEMENT:** Commenters believe that many dog walkers are irresponsible and detrimental to the park.

**Representative Quote(s):** **Corr. ID:** 185224      **Organization:** *Not Specified*  
**Comment ID:** 31334      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** As a hiker and birdwatcher, time and time again I see "Leash Pets" and "No Pets" signs being ignored as inconsiderate owners allow off-leash dogs to chase shorebirds off the beaches, trample plants and nesting birds and drive other park users away.

**Corr. ID:** 185423      **Organization:** *Not Specified*  
**Comment ID:** 31188      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** The various forms of excrement deposited by dogs, at times is not removed by pet owners even when their dog is leashed, contributing to natural resource contamination and a visual blight.

**Corr. ID:** 184932      **Organization:** Safe parks for kids  
**Comment ID:** 31948      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** The most common problem is the park is the issue of nuisance from the off leash dogs. Every time that I have gone to the beaches with my family, we have problems with dogs approaching our children and running across our blankets. The also like to shake off after getting out of the water. The dogs have even tried to eat food that we bring to the beach. Dog owners are rarely in enough control to stop their dogs from approaching our beach set-up. Then they just come over and say they are sorry and continue to allow their dogs to run on the beach. I don't think I have ever seen an owner leash a dog after it has run on our blanket. There is also an environmental impact on allowing the dogs to be off-leash in the park. Dogs are always chasing native birds and other animals. They also run across native vegetation and urinate on the vegetation. Some areas of the park have such heavy concentrations of urine and excrement that they smell (e.g., Crissy Field). Dog owners

are still not picking up excrement in the park. I have seen several dog owners just cover up excrement in the sand on the beaches. The beaches should not be a litter box.

**Concern ID:**

12402

**CONCERN STATEMENT:**

Commenters point out that dog walkers use park resources responsibly and therefore benefit the park and other users.

**Representative Quote(s):**

**Corr. ID:** 184824      **Organization:** *Not Specified*

**Comment ID:** 31161      **Organization Type:** Unaffiliated Individual

**Representative Quote:** My dog and I are respectful of other people, other dogs, horses and riders, hang-gliders and their equipment, Park Service personnel, Scouts on camping and field trips, and volunteers who care for the native plants and other natural resources at Fort Funston. Children, cyclists, picnickers, and photographers get more curious attention from my dog than most other park users, but I have yet to hear any complaints about the presence of a well-behaved dog off-leash in the park. I expect no less good and civil behavior from any other park visitors.

When I see dog owners behaving badly, such as not abiding by the clean-up rules, or not supervising their high-spirited dogs, I say something to them about it. The most typical thing is people not cleaning up after their dogs. I bring my own bags, and always carry extra in order to offer one to the person who "forgets" to bring their own. I pick up, if needed, after those who do not, within reason, while I am cleaning up after my own dog.

**Corr. ID:** 184991      **Organization:** *Not Specified*

**Comment ID:** 29477      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The vast majority of dogs and their "parents" who frequent the GGNRA, Crissy Field and other areas of The City are very responsible and would welcome this compromise as a fair and just solution to the issue of off leash dogs. While there are of course a "few bad apples" (bad apples applies to "human children" as well as "canine children") let's not punish all the hard working, tax paying citizens who are responsible and enjoy daily the beauty and peace that is available for us at Crissy Field.

**Corr. ID:** 185198      **Organization:** *Not Specified*

**Comment ID:** 30805      **Organization Type:** Unaffiliated Individual

**Representative Quote:** We are responsible pet guardians -always mindful of other dogs, people and children. In fact, I think dog owners do a great deal to help cleanup and maintain habit care. We applaud and support the efforts of the Crissy Field Dog Group and their mission to ensure responsible dog ownership and the establishment and upholding of permanent off-leash dog walking rights within the GGNRA.

**Corr. ID:** 185256      **Organization:** *Not Specified*

**Comment ID:** 31309      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The Presidio Trust maintenance people set out poop-bags once a week; when these run out, one or another neighbor contributes a sack full of old grocery bags. If a newcomer tries to ignore his dog's feces, there is usually a "regular" nearby to offer a spare bag and embarrass him into cleaning up. When someone shows up with an aggressive or unsocialized dog, he meets such a barrage of raised eyebrows, frowns, and mild protests that he either leashes his dog or leaves the area forever.

**Corr. ID:** 185325      **Organization:** *Not Specified*

**Comment ID:** 30893      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Regarding clean-up of beaches, etc. Crissy Field Dog Group purchased thousands of "dog litter" bags and fills each station every morning. The group also sponsors 3rd Sat beach clean-ups. I have never seen a jogger pick-up anything! This costs NPS nothing.

**Corr. ID:** 185420      **Organization:** *Not Specified*

**Comment ID:** 31239      **Organization Type:** Unaffiliated Individual

**Representative Quote:** There seems to be a very good relation between unleashed dogs under voice control at Crissy Field. The current group of people in our time there are extremely conscious of dogs who need training or who are unsupervised. Many of us speak to these persons and even jot down license numbers or describe incidents and detailed descriptions of incidents so that repeats can be monitored. We are very impressed with the four or five dog walkers whom we see daily. There have been few or no problems with them. Needless to say, the support group of the owners has been a great personal reward for so many of us. We try and do provide plastic bags for metal containers and have many pick-up days.

**Corr. ID:** 185421      **Organization:** Crissy Field Dog Group

**Comment ID:** 31393      **Organization Type:** Recreational Groups

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

**Corr. ID:** 185430      **Organization:** *Not Specified*

**Comment ID:** 31448      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Dog walkers such as myself are more likely to protect our parks through 1) picking up after our dogs and others 2) reporting suspicious activities of drug and alcohol related 3) reporting vandalisms against the park, and 4) protecting the park from looters. Last year, there were reported incidents that happen early mornings at Fort Funston notify by the early dog walkers. By reporting to the Park Rangers immediately the safety of the park was secured and carried out by warning other dog walkers.

### **VU4020 - Visitor Use: Professional dog walkers**

**Concern ID:** 12384

**CONCERN STATEMENT:** Commenters believe that professional dog walkers benefit the users of the park.

**Representative Quote(s):** **Corr. ID:** 184876      **Organization:** *Not Specified*

**Comment ID:** 31352      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I have found the professional dog-walkers to be a great asset at Ft. Funston. Many of them know a great deal about dogs and offer training advice and companionship.

**Corr. ID:** 185347      **Organization:** *Not Specified*

**Comment ID:** 30962      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Professional dog walkers in San Francisco provide a service to dog owners that is crucial and indispensable. For those of us who work long hours away from home, it would be impossible to own a dog without the availability of someone trusted and capable to take our dogs out during the day. If it becomes too difficult to find appropriate space for them to provide their services, many dog walkers

may give up their profession. Not only would this put many people out of work, but it would have serious consequences for working dog owners and their beloved Best Friends.

**Concern ID:** 12385  
**CONCERN STATEMENT:** Commenters believe that NPS should establish and enforce a limit on the number of dogs per professional walker and require all professional dog walkers to be licensed within the GGNRA.

**Representative Quote(s):** **Corr. ID:** 185039 **Organization:** *Not Specified*

**Comment ID:** 30753 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** As with the case for dog walkers, in my day to day trips, I do see an increase in the number of dog walkers and see no problems with them. Applying a maximum number of dogs per walker at one time though would seem to alleviate any problems others may have to them.

**Corr. ID:** 185277 **Organization:** *Not Specified*  
**Comment ID:** 31116 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Professional dog walkers- restrict their use of GGNRA! Ensure they are licensed, renewed annually with fee or pay a usage fee per dog to conduct their businesses on public land; restrict to maximum of six dogs per outing to GGNRA lands- individual dog owners limit to four dogs per outing. Allow these professional dog walkers to "run" dogs they are exercising only Monday thru Fridays a specific/special parking lot area for these professionals be set aside, then NPS/Park Police can monitor their use, ensure license/ fees are current.

**Concern ID:** 12387  
**CONCERN STATEMENT:** Commenters state that GGNRA for-profit dog walking is incompatible with the purposes of a national park.

**Representative Quote(s):** **Corr. ID:** 184873 **Organization:** *Not Specified*

**Comment ID:** 30888 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Furthermore, use of public lands by for-profit dog-walking business is incompatible with the maximum recreational and aesthetic experience for the park. Movie makers have to make special arrangements to shoot in parks and other companies are charged fees to operate in parks. Yet, professional dog walkers think they can use public facilities. They should be strictly regulated and kept out all together of almost all areas of GGNRA.

**Corr. ID:** 185441 **Organization:** Golden Gate Audubon Society  
**Comment ID:** 29511 **Organization Type:** Conservation/Preservation  
**Representative Quote:** Golden Gate Audubon believes that the commercial dog walking policy NPS considers must include the possibility of no commercial dog walking at the park, depending on the assessed safety and environmental impacts of such activity.

#### ***VU4050 - Visitor Use: Impacts of No Action/Current Conditions***

**Concern ID:** 12457  
**CONCERN STATEMENT:** Commenters do not agree that off leash dogs interfere with other recreational uses of the GGNRA.

**Representative Quote(s):** **Corr. ID:** 184971 **Organization:** *Not Specified*

**Comment ID:** 30946      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** In the many years I've been going to Fort Funston, I have not seen a negative impact to other recreational activities. The Hang Gliders, runners, bikers, walkers, hikers, kite flyers, model plane flyers all seem to be able to enjoy their activities while dogs run free.

**Concern ID:** 12459  
**CONCERN STATEMENT:** Commenters state that banning dogs from GGNRA will decrease visitor use.

**Representative Quote(s):** **Corr. ID:** 185004      **Organization:** Not Specified

**Comment ID:** 31380      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** if you shut dog owners out of GGNRA lands, people will avoid these places completely. We will no longer benefit from the spectacular views at Fort Funston or the relaxation at Ocean Beach. We are only talking about 1% of GGNRA lands being preserved as off leash areas. Given the number of dogs and families that benefit from allowing off leash areas, I do not think 1% is too much to ask for. And if these areas dry up and it becomes harder and harder to find nice places to provide exercise for our dogs, owning dogs will no longer be viable for many. This will put stress on overpopulation by unwanted dogs in the cities, dogs that could otherwise have been placed in good homes.

**Concern ID:** 12462  
**CONCERN STATEMENT:** Commenters state the presence of dogs benefits users of the GGNRA.

**Representative Quote(s):** **Corr. ID:** 184818      **Organization:** Not Specified

**Comment ID:** 31022      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** I have participated in the off-leash debate for many years, and as a parent my views have become even stronger: we need places where families, including our dogs, can fully enjoy our majestic coastline. I support the model in place at Ocean Beach, where a clearly-signed portion of the beach tolerates off-leash access under voice control, and a sensitive ecological habitat is closed to off-leash dogs. This effectively separates families who don't want to be near off-leash dogs from families which include off-leash, well-trained, carefully-supervised dogs.

On a particularly sunny day last July we went to Crissy Field, where my daughter sat in the sand (for the first time) while my husband played fetch with the dogs. We were surrounded by other families with and without dogs; windsurfers; joggers; bikers; tourists; sailors; people of a great diversity of backgrounds, all managing to peacefully cohabit the beach. Please don't deny us and our dogs the opportunity to enjoy this open space -which includes being able to run on the beach and swim.

**Corr. ID:** 185257      **Organization:** Not Specified

**Comment ID:** 31360      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Children learn that dogs should not be feared, and they learn how to approach dogs in the correct way. Fostering this activity teaches children to respect animals, and hopefully it is something they will take into adulthood

**Corr. ID:** 185433      **Organization:** Not Specified

**Comment ID:** 30998      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** While GGNRA literature constantly refers to the "Dog Management Plan" and to "Dog Use" in the GGNRA, what is actually under discussion

is "off-leash dog walking", whereby people may enjoy the trails and the serenity of nature in the company of their canine companions. This is not about dogs, it is about a traditional form of recreation, for many the only form of recreation, which binds people to their environment, improves the physical health of its devotees, and provides pleasure and stress-reduction in the very high-pressure Bay Area.

Again, a primary mission of the GGNRA is to provide access to recreation. Off-leash dog walking is one such form of recreation. Dogs have been described as being "light on the land", and certainly the requirements and impact of dog walking are limited, though any recreational activity has an impact. Dog-walking should not be subjected to a higher level of scrutiny than other forms of recreation (which is what terms such as "dog use" seem to imply). In addition, off-leash dog-walking should be recognized and nourished as the valuable activity it is.

As demographics change, as families become smaller and people live longer, often with a pet as faithful companion, the GGNRA is in a unique position to assist in bettering the health of Bay Area families and individuals and providing broader recreational opportunities in its expanded Bay Area GGNRA lands, while maintaining access of all our residents to the beauty and grandeur of our local environment.

**Concern ID:**  
**CONCERN STATEMENT:**

12464  
Commenters argue that other uses of the park, besides dog walking, cause damage to the GGNRA.

**Representative Quote(s):**

**Corr. ID:** 184790                      **Organization:** *Not Specified*

**Comment ID:** 29467                      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Kids are doing more damage to the park than dogs. They have parties at night and leave trash around. They "sled" down the sand dunes.

**Corr. ID:** 184987                      **Organization:** *Not Specified*

**Comment ID:** 30861                      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** If horses apparently have "free rein" in Marin Headlands, Why aren't dogs afforded the same consideration?? Horses, while perhaps not as numerous, produce a fecal "contribution" which is certainly more voluminous in some instances...speaking from the point of view of an experienced hiker, who has usually attempted successfully to "steer clear" of horse droppings.

**Corr. ID:** 185429                      **Organization:** *Not Specified*

**Comment ID:** 29425                      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** When I walk my dog at Crissy Field or on the beach at Fort Funston, it is my responsibility to pick up after her. I do this assiduously, as do most dog caretakers. Like most dog people, I adhere to the Sierra Club's injunction to take only photos and leave only footprints. It would be wonderful if all other park users were so careful. The detritus left behind by the general population (food and containers, used syringes, condoms, beer cans, glass bottles, etc.) is unsightly, smelly, non-biodegradable, as well as outright dangerous.

Small children can and do leave the same deposits as dogs, unfortunately sometimes in the water. Often, parents are not quite so careful as dog owners, because there are fewer consequences for them. Children also trample plants. Pre-teen and adolescent children, as well as young adults who never grew up often deliberately disobey signs, and cross over and under fences and destroy protective habitats and flora.

I have to be careful that my dog does not disturb anyone else in their enjoyment of the park and ensure that she and I are both considerate to others around us. Would that the

parasailors and wind surfers were so considerate. I can't count the number of times that I have been nearly hit in the head by a giant board, tangled in leads, or been unable to walk along the beach because of the number of boards berthed there.

When playing, my dog doesn't make noise. I can't say that for people who loudly play "music" in the GGNRA or yell and scream at one another.

It would be as unfair to prevent me from enjoying my recreational activity with my dog, who loves to chase sticks in the water, as it would to limit ball playing because people like me are very afraid of getting hit in the head by a stray ball. Although there are no statistics, I would guess that more people have been injured by balls than by dogs.

However, I am arguing that all park users' concerns should be considered and that if a behavior on the part of a dog is egregious, then the behavior is egregious for all. If dog owners must pick up after themselves (as they certainly should), then everyone must pick up after himself. This should not be used as an argument against denying off-leash dog walking. If we limit the rights of people with dogs because some people are afraid of dogs, then we should limit all activities that induce fear in some people.

**Corr. ID:** 185434                      **Organization:** *Not Specified*

**Comment ID:** 29249                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** All users of the park, including bikers, joggers, kite flyers, hikers, and humans (often in automobiles) do some form of damage to these facilities and each other and it is unfair to single out dog owners.

**Corr. ID:** 185436                      **Organization:** *Not Specified*

**Comment ID:** 29471                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I understand that compromise is necessary so that all park users can have an enjoyable experience in the park. I think that the NPS needs to assess usage and the needs of the dog public as well as other park users. I think dogs take a bad rap for impact when other users such as speeding bike riders, kite boarders who take up the whole beach with their gear and major events such as benefit runs, Fleet Week and the Fourth of July also create a significant impact. I have a friend who received a ticket because his dog was digging in the sand, while several yards away children who were doing the same thing were not ticketed. Last year viewers of boats at Crissy during Fleet Week were not ticketed for standing on top of fenced off berms while owners of dogs who venture onto the berms on other days have been ticketed. We ask for fair assessment and fair treatment.

### ***VU5000 - Visitor Use: Cumulative Impacts***

**Concern ID:** 12637

**CONCERN STATEMENT:** Commenter states that the NPS should study the scientific evidence of the impacts of off leash dog users as compared to other user groups.

**Representative Quote(s):** **Corr. ID:** 185421                      **Organization:** Crissy Field Dog Group

**Comment ID:** 32036                      **Organization Type:** Recreational Groups

**Representative Quote:** 19) The NPS should study scientific evidence of impacts by off leash dog users as compared to other NPS user groups, including other recreational users. Identify and consider cumulative impacts of these users groups and options for reducing impacts, including changes to current land use designations.

### ***WH2000 - Wildlife And Wildlife Habitat: Methodology And Assumptions***

**Concern ID:** 12382  
**CONCERN STATEMENT:** Commenters state that any program that impacts wildlife must be supported by scientific research.

**Representative Quote(s):** **Corr. ID:** 185419 **Organization:** *Not Specified*

**Comment ID:** 31217 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The quail reintroduction program, or any other program that's put in place, should be accompanied by scientific research, so that as much as possible it proceeds on genuine data and not just logical assumption. To the extent possible, the public should be encouraged to contribute data.

**Corr. ID:** 185421 **Organization:** Crissy Field Dog Group

**Comment ID:** 31400 **Organization Type:** Recreational Groups

**Representative Quote:** The NPS should study the value of dispersing recreational uses and activities across park areas and resources, including off leash recreation. Provide the scientific data to establish wildlife protection/wildlife sanctuary areas within the GGNRA. Study areas have to be cohesive-no one size fits all. Keep the study areas small so their unique characteristics can be considered

#### ***WH4050 - Wildlife and Wildlife Habitat: Impact of No Action/Current Conditions***

**Concern ID:** 12460  
**CONCERN STATEMENT:** Commenters are concerned about the impacts to sensitive and unique wildlife and habitats as a result of continuing to permit off leash dogs in GGNRA.

**Representative Quote(s):** **Corr. ID:** 184817 **Organization:** *Not Specified*

**Comment ID:** 31151 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Many dog owners totally ignore "No Dogs" posted trails. This is very upsetting as I have seen a big decline in wildlife over the past 15 years - there was a time when it was quite common to see foxes and bobcats and coyotes, and even a mountain lion, and at quite close proximity. With dogs, the majority running unleashed, the wildlife is sure to move on, but to where? The ever encroaching urban development gives them few options, and therefore we are losing valuable wildlife and their habitat.

**Corr. ID:** 184918 **Organization:** Self

**Comment ID:** 29219 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I strongly support a strict policy to restrict free running dogs on GGNRA property. These lands feature sensitive and unique coastal habitat and flora and fauna that are in increasingly short supply ! Dog owners must be required to restrain and leash their dogs on these public lands. In some cases where there is natural landscape and sensitive habitat, that has often been painstakingly restored, dogs should not be allowed.

**Corr. ID:** 184942 **Organization:** *Not Specified*

**Comment ID:** 29416 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would prefer that most areas be off limits to dogs entirely, especially any areas that include wildlife habitat. Allowing dogs off-leash in these areas sets a bad precedent that endangers all areas within the National Parks to further habitat degradation and wildlife endangerment.

**Corr. ID:** 184942      **Organization:** *Not Specified*

**Comment ID:** 29419      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I've seen areas (Fort Funston) where the ground is dug up and trampled by the feet of thousands of running and digging dogs, where owners allow their pets into areas clearly marked as sensitive habitat. I've watched dogs chasing seabirds along the beach at Ft. Funston and Ocean Beach with their owners full encouragement.

**Corr. ID:** 185024      **Organization:** *Not Specified*

**Comment ID:** 30847      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I want the birds and other natural fauna at Crissy Field and other locations within GGNRA to be free from harassment by unleashed dogs... Unleashed dogs are a menace to native fauna.

**Corr. ID:** 185100      **Organization:** *Not Specified*

**Comment ID:** 31155      **Organization Type:** Unaffiliated Individual

**Representative Quote:** My own observations, as well as those of Rich Stallcup (Muir Beach Bird Study) and PRBO bird surveys, indicate significant wildlife impact due to loose dogs at the beach, which are not under voice control. I have seen deer harassed by dogs owned by specific individuals living near the end of Pacific Way (who let their dogs run free on the beach regularly without voice control). Also there are many off leash dogs on trails with virtually no enforcement. Burrowing Owls, Badger, Gray Fox, and other wildlife on Coyote Ridge trail, especially, are daily stressed by off-leash dogs.

**Corr. ID:** 185118      **Organization:** *Not Specified*

**Comment ID:** 31382      **Organization Type:** Unaffiliated Individual

**Representative Quote:** It is CRUCIAL that bird nesting habitats be protected during egg-laying periods. These nesting cycles should be well advertised...with postings clearly visible along trails so that the owner/caretaker could take notice to act accordingly, but at all other times I feel that the dogs should be given the gift of running free alongside the sea without restraint.

**Corr. ID:** 185419      **Organization:** *Not Specified*

**Comment ID:** 31212      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I support the continuing closure of plover nesting areas to off-leash dogs on Ocean Beach. Because plover nest on the beach itself, they are vulnerable.

The tops of the cliff above the swallow nesting area should also be closed to people and dogs (off- or on-leash). It's a risky place to walk, and it seems probable that this would disturb nesting. Dogs present no other threat to swallows. Existing fences on these cliff tops have been dislodged by erosion from winter storms. (Erosion by people and dogs is insignificant compared to erosion by weather.) The fences should be maintained, because the sight of old fences dangling down the cliff, while unlikely to bother swallows, signifies to humans that no one cares about the area. People may conclude that restrictions in the name of protecting the area are hypocritical.

Until recently the Fort Funston area was one of the last strongholds of the California quail in San Francisco. Within the last several years the population seems to have vanished. I suggest a program to reintroduce quail, and to study the factors that contributed to their loss. This should include a well-publicized effort to support the reintroduction.

Quail need habitat, and ice plant is too low for them. More areas should have ice plant removed, and be planted with native vegetation to provide shelter for quail. Dog

walkers could be recruited to help with this work. In return for the assurance that they will still be able to walk dogs off-leash at Fort Funston, this energetic, well-organized group of people would supply abundant labor, and could be enlisted to support habitat protection. Replanted areas should be created, and temporarily protected on a rotating basis. Thus dog walkers would help create areas from which they are excluded while vegetation takes root, but with paths they will be able to use when the vegetation is better established.

Since many people are fond of ice plant, and some value it as a (recent) historical part of the California landscape, and since it is resistant to foot traffic, some areas should probably continue to be ice plant. (Ice plant versus native vegetation is irrelevant to swallows, since research has shown that they do not feed over either kind of vegetation, but rather at Lake Merced.)

**Corr. ID:** 185441      **Organization:** Golden Gate Audubon Society

**Comment ID:** 29512      **Organization Type:** Conservation/Preservation

**Representative Quote:** While it is especially crucial to maximize protections for special-status species such as the Bank Swallow, Western Snowy Plover, Northern Spotted Owl and Brown Pelican, the NPS does not only have a duty to protect "sensitive" species at the GGNRA, as stated in its Dog Management/EIS document. It also has a responsibility to establish measures to protect and preserve all wildlife and habitat for future generations to enjoy. The fact that some healthy populations of birds and other wildlife currently exist at the GGNRA together with widespread disturbance does not mean these populations are resilient and can sustain further disturbance. Rather, Golden Gate Audubon posits that these birds are there in spite of widespread disturbance and it is, therefore, more important now than ever before to protect all the valuable populations and habitats that remain.

**Corr. ID:** 187669      **Organization:** Center for Biological Diversity

**Comment ID:** 31542      **Organization Type:** Conservation/Preservation

**Representative Quote:** Running dogs off-leash at the GGNRA puts the welfare of wildlife at great risk. The GGNRA contains over 100 rare or special status plants and animals. 67 Fed. Reg. 1424, 1428 (Jan. 11, 2002). In recognition of the critical importance the GGNRA plays in the conservation of these species, the park was designated as part of the Golden Gate Biosphere Reserve in 1989. *Id.* In addition, the park contains literally thousands of other species, many of which find refuge in the park as either localized residents or migrating visitors.

The GGNRA has a "heightened responsibility to preserve and protect those species and their habitat everywhere they occur within the GGNRA." *Id.* Unfortunately, the increasing frequency and intensity of off-leash dog walking at the park has made it exceptionally difficult to ensure that imperiled species in the park are not jeopardized. Because they are physically unrestrained and cannot understand the sensitivity of the GGNRA's parklands, off-leash dogs are more likely to initiate activities that harm or harass wildlife. And once initiated, harmful or destructive behaviors are more difficult to correct than those of dogs that are on-leash.

**Corr. ID:** 187678      **Organization:** *Not Specified*

**Comment ID:** 31571      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Fragmented urban landscapes present special problems (Primack 2004, Newman 1993). Based on biogeographic theory, they are inherently unstable (McCullough 1996) and susceptible to invasion (Soule 1980). Small populations of wildlife confined to small areas lose their ability to rebound from the various kinds of disturbances that inevitably arise, including things like disease, fire, over-predation, natural population cycles of the species or its food, landslides, and so on. Many bird species can make use of several parks for foraging, but local populations can disappear when breeding sites, in some cases found in only one or a

few parks, are disturbed or subject to excessive predation or damage. There is, then, a natural trend of species loss in these fragmented parks. In fact, about 50% of the plants recorded in the 1958 Flora of San Francisco California (Howell et al. 1958) have gone extinct from San Francisco. The "Significant Natural Resource Areas Plan" of the San Francisco Recreation and Parks Department is an attempt to create a plan that will stabilize and in some areas reverse this trend.

**Corr. ID:** 187678      **Organization:** *Not Specified*

**Comment ID:** 31573      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The proposed control of dogs seems appropriate and even conservative to us. Though one study argues that dog impacts are sometimes overstated (Bekoff and Meany 1997), dogs have been implicated as injuring and sometimes killing small animals including reptiles and amphibians (Koenig et al 2002; Shine and Koenig 2001). Research has shown that dogs can extend the zone of human influence and contribute to the annual mortality of some species (Miller, Knight, and Miller 2001). The relatively benign act of running in bird nesting and foraging areas has been shown to disturb bird and mammal activities, potentially change their distributions, and possibly place energetic stress on the birds at crucial times in their annual cycle, reducing reproductive success and survival (Lafferty, 2001; Sime, 1999; Abraham, 1999; Bekoff and Ickes 2001; Thomas et al. 2002).

**Corr. ID:** 184967      **Organization:** *Not Specified*

**Comment ID:** 31987      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The nature of the disturbance of shorebirds and other species at Ocean Beach by off-leash dogs probably makes this situation the worst case of human disturbance of shorebirds I have encountered. A previous study I was involved in found that intermittent disturbance along a beach of similar length to Ocean Beach at a shorebird roosting area resulted in reductions of numbers of shorebird present of up to 50% within a year and probably caused some species to abandon the beach over time. In this situation, however, disturbance only occurred at high tide. Therefore, disturbance at Ocean Beach due to off-leash dogs may be far worse, since shorebirds are subject to maximum disturbance during all of the tidal cycle.

**Concern ID:**

12461

**CONCERN STATEMENT:**

Commenters state that loss of natural habitat in surrounding areas has increased the need for stronger protection of the land within GGNRA.

**Representative Quote(s):**

**Corr. ID:** 184698      **Organization:** *Not Specified*

**Comment ID:** 29224      **Organization Type:** Unaffiliated Individual

**Representative Quote:** One of the main reasons for loss of wildlife is habitat loss. According to Wildcare, most of the injured birds and mammals are the result of cars, gunshots and collisions with windows and high wires. As development continues to grow, the wildlife loses habitat and corridors to get from one place to another. There is plenty of blame to go around.

**Concern ID:**

12463

**CONCERN STATEMENT:**

Commenters believe that impacts caused by dogs are insignificant compared to those caused by natural processes.

**Representative Quote(s):**

**Corr. ID:** 185274      **Organization:** *Not Specified*

**Comment ID:** 29515      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Bank swallows: They are not harmed or disturbed by dogs. Erosion of their habitat by dogs/people is insignificant compared to erosion by yearly winter storms, and swallows are (at present) completely able to cope with either form

of erosion.

**WH5000 - Wildlife and Wildlife Habitat: Cumulative Actions and Effects**

**Concern ID:** 12375

**CONCERN STATEMENT:** Commenters urge the NPS to consider the impacts of dogs on habitat outside of the park.

**Representative Quote(s):** **Corr. ID:** 187678 **Organization:** *Not Specified*

**Comment ID:** 31589 **Organization Type:** Unaffiliated Individual

**Representative Quote:** India Basin Shoreline Park -- 6.18

This is the only Natural Area adjacent to the Bay, and contains one of only a few tidal salt marsh wetlands in the City. It has suitable habitat for a variety of shorebirds and foraging habitat for raptors. Birds using the shore and nesting in wetlands can be highly disturbed by dogs. The experience of other conservation efforts has shown that restricting dog access to important habitat increases bird use (Birds Australia undated). Enforcement of on-leash regulations will help improve nesting area quality.

**Corr. ID:** 187678 **Organization:** *Not Specified*

**Comment ID:** 31584 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Pine Lake -- 6.7

A natural lake supports significant wetland habitat, habitat for a variety of bird species, and habitat for western pond turtles. Turtles may be limited by a lack of shore nesting habitat. Non-native turtles may be preying on the remaining (if any) pond turtles. Wetlands are considered the most sensitive habitats at this Natural Area and are mostly MA-1. The Natural Area is heavily used for recreation. Control of dogs and human traffic is crucial. Providing dedicated access points and enforcing leash requirements is necessary to revegetation and restoration efforts.

**Corr. ID:** 187679 **Organization:** Friends of Animals

**Comment ID:** 31593 **Organization Type:** Non-Governmental

**Representative Quote:** I write on behalf of Friends of Animals, a national advocacy group founded in 1957, in support of the petition filed on August 16, 2005, submitted by a broad coalition of groups. In an effort to protect park visitors, pets, free-living animals, and our parks in San Francisco, we request that you promulgate and enforce leash laws in the Golden Gate National Recreation Area (GGNRA).

The GGNRA is the only national park in the country that does not enforce leash laws. Unfortunately the GGNTA is not a safe place for dogs to run off-leash, because there are no safeguards in place for dogs there. We recommend that this be rectified through the proposed negotiated rulemaking process. In the meantime, leads are imperative in order to stop dogs from straying, being injured, and even killed.

In order to preclude unnecessary threats to other animals, both free-living and domestic, as documented in the petition herein, we hope you will give this petition serious consideration

**Concern ID:** 12378

**CONCERN STATEMENT:** Commenters state that NPS must consider the impacts of feral cats on wildlife populations.

**Representative Quote(s):** **Corr. ID:** 187678 **Organization:** *Not Specified*

**Comment ID:** 31575 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Feral cats are a serious problem for the remaining wildlife

populations in the Natural Areas, and are well known to predate heavily on birds and small mammals (Hawkins 1998). Cats will continue to kill prey species even when populations of prey are low, increasing the chances of extinction for the prey (Churcher and Lawton 1987). In a study of highly fragmented remnant natural areas, the absence of cats in some fragments was highly correlated with increased bird diversity (Crooks and Soule 1999; Soule 1991).

**Concern ID:** 12380

**CONCERN STATEMENT:** Commenters state that NPS must analyze the cumulative impacts of dogs to wildlife.

**Representative Quote(s):** **Corr. ID:** 184883      **Organization:** *Not Specified*

**Comment ID:** 30788      **Organization Type:** Unaffiliated Individual

**Representative Quote:** -Must carefully analyze past, present and future impacts of dogs to wildlife and habitat in the GGNRA.

#### ***WQ4000 - Water Resources: Impact Of Proposal And Alternatives***

**Concern ID:** 12641

**CONCERN STATEMENT:** Commenter states that the environmental study as related to water quality must differentiate between the multiple sources of contamination.

**Representative Quote(s):** **Corr. ID:** 185085      **Organization:** CalDOG

**Comment ID:** 31922      **Organization Type:** Recreational Groups

**Representative Quote:** The environmental study should require that claims related to water contaminants are specifically supported by test data that differentiate between alternative sources of contamination.

## APPENDIX 1. CORRESPONDENCE INDEX OF ORGANIZATIONS

ID	Author	Org.	Form Letter
<b>Business</b>			
187675	Peak, Karen	West Wind Dog Training	No
<b>Conservation/Preservation</b>			
185220	Allevato , Diane	The Marin Humane Society	No
185222	Desai, Neal	National Parks Conservation Association	No
187674	Desai, Neil	NPCA	No
185416	Heath, Mark	California Native Plant Society- Yerba Buena Chapter	No
185441	Murray, Samantha	Golden Gate Audubon Society	No
184964	Plater, Brent	Center for Biological Diversity	No
184965	Plater, Brent	Center for Biological Diversity	No
185018	Plater, Brent	Center for Biological Diversity	No
185022	Plater, Brent	Center for Biological Diversity	No
185030	Plater, Brent	Center for Biological Diversity	No
185057	Plater, Brent	Center for Biological Diversity	No
187667	Plater, Brent	Center for Biological Diversity	No
187669	Plater, Brent	Center for Biological Diversity	No
187673	Plater, Brent	Center for Biological Diversity	No
187678	Plater, Brent	Center for Biological Diversity	No
187697	Plater, Brent	Center for Biological Diversity	No
187698	Plater, Brent	Center for Biological Diversity	No
187699	Plater, Brent	Center for Biological Diversity	No
185411	Smith, Robin	Sequoia Audubon Society	No
185258	Webb, Rosalie	Black Point Environmental Action Committee	No
<b>Non-Governmental</b>			
187684	Boyles, Stephanie	PETA	No
187676	Buckley, Jill A	ASPCA	No
187679	Feral, Priscilla	Friends of Animals	No
187677	Grimes, Tammy	Dogs Deserve Better	No
187672	Styron, Sheila	Guide Dog Users Inc	No
187693	Wheatley, Marie B	American Humane Association	No
<b>Recreational Groups</b>			
185421	Walters, Martha	Crissy Field Dog Group	No
185085	Fergus, Gary S	CalDOG	No
184936	Kept private	Dog Adventures	No
185202	Nancy , Leavers	The Crissy Field Dog Group	No
185240	Wiley , Alice	The Crissy Field Dog Group	No
187685	Reid, Joan G	Sacramento council of dog clubs	No
<b>State Government</b>			
187681	Speier, Jackie	California State Senate	No
<b>Town or City Government</b>			
187680	Sandoval, Gerardo C	City and County of San Francisco	No
187682	Alioto-Pier, Michela	City and Country of San Francisco	No
187689	Peskin, Aaron	City and County of San Francisco	No

**APPENDIX 2. CORRESPONDENCE INDEX OF INDIVIDUAL COMMENTERS**

<b>Correspondence ID</b>	<b>Author</b>	<b>Form Letter</b>
185181	Martin, III, Francis A	No
185061	Kept Private	No
184753	Kept Private	No
185352	Albinson, Paula	No
185284	Allen , Casey	No
184975	Kept Private	Yes (184961)
184993	Andreson, Jean	No
185395	Apple, Grace	No
185280	Asaro, Barbara	No
185368	Asaro, Barbara	No
184851	Kept Private	No
184918	Bakewell, Robert	No
185226	Bakker, Carol	No
185414	Barley, David	No
184707	barnes, jerry f	No
184708	Kept Private	No
184689	Kept Private	No
185033	Barnhart, Matthew	No
184643	Kept Private	No
184966	Beall, Frederick M	No
184690	Beck, Martha	No
185051	Kept Private	No
184614	Kept Private	No
184749	Kept Private	No
184773	Kept Private	No
185187	Bernstein, Mathew A	No
185188	Bernstein, Mathew A	No
185346	Best, Elaine	No
185223	Black, Sheila	No
184712	Blankenship, Kelly A	No
184942	Kept Private	No
185429	Blondis, Linda	No
184989	Kept Private	No
185237	Blum, Jan	No
185111	Kept Private	No
184984	Kept Private	No
184996	Brastow, Peter C	No
185036	Kept Private	No

184858	Kept Private	No
185367	Briggs, Sandy	No
184815	Brodie, Michelle D	No
185216	Brodie, Michelle	No
184553	Kept Private	No
184555	Brown, Christopher S	No
185200	Brown, Joyce	No
184588	Brown, Joyce and Arnold	No
185348	Brownback, Josephin	No
184733	Kept Private	No
185013	Kept Private	Yes (184961)
185314	Buckley, Robin	No
184926	Kept Private	No
185056	Burns, Charles P	No
184969	Kept Private	Yes (184961)
184790	Kept Private	No
185436	Cancelmo, Sally	No
185058	Kept Private	No
185059	Kept Private	No
185298	Carment, Monique	No
184991	carpenter, doug r	No
184803	Kept Private	No
185005	Kept Private	No
184872	Kept Private	No
184825	Casassa, Corrinne	No
184826	Casassa, Michael	No
165386	Kept Private	No
184839	Cawley, Brenda	No
184958	Chai, Benedick	No
185039	Kept Private	No
185303	Christensen, Pat	No
185304	Christensen, Pat	No
185366	Christman, Barbara	No
184870	Kept Private	No
185060	Chua, Teresa E	No
185115	Chung, Civiane	No
184938	Kept Private	No
185439	Church, Emily	No
185110	Kept Private	No
184716	Clough, Fred W	No
184906	Kept Private	No
184956	Kept Private	No
185183	Cohen , Barbara	No

185383	Cole, Jessica	No
184962	Kept Private	No
185043	Kept Private	No
185063	Kept Private	No
185075	Kept Private	No
184875	Kept Private	No
185120	Kept Private	No
184883	Kept Private	No
185454	Copsey , Carol	No
184941	Kept Private	No
184928	Kept Private	No
185045	Kept Private	No
184736	Craw, Frederick G	No
185198	Crutcher, Hanna	No
184881	Currie, Jim	No
184812	Kept Private	No
185431	D'Alonzo, Mary Beth	No
185040	D'Alonzo , Janice J	No
184862	Kept Private	No
185098	Del Campo, Margarita M	No
187692	Diamond, Kathy	No
185293	Dinslage, Joyce	No
185021	Kept Private	No
184296	Dooley, Kathleen	No
185290	Dooley, Kathleen	No
185291	Dooley, Kathleen	No
185078	Dossey, Lisa	No
183951	Kept Private	No
183957	Kept Private	No
185337	Draper, Abby	Yes (185335)
185357	Draper, Ann	Yes (185335)
185335	Draper, James	Master (185335)
185037	Kept Private	No
185279	Dunsmore, Marnie	No
184963	Kept Private	No
185412	Edwards, Jean	No
185185	Ernst, Leslie	No
184737	esteva, michelle l	No
185024	Kept Private	No
185350	Everdell, Elizabeth	No
187691	Ewing, John	No
184481	Kept Private	No
184734	Fader, Jonathan	No

185105	Farrow, Anne	No
184844	Kept Private	No
187688	Fielder, Peggy	No
187690	Fielder, Peggy	No
185009	Fieldhouse, Martin	No
184774	Kept Private	No
184987	Fitch, Michael	No
185001	Kept Private	No
184981	Flinn, Jeri F	No
185299	Floyd, Lydia	No
184605	Fortmann, Richard	No
185359	Foster, Corny	Yes (184905)
185062	Kept Private	No
185398	Funsten, Ann	No
185402	Galloway, Carol	No
184591	Gardner, Angela	No
184997	Kept Private	No
184992	Gaylor, Erika	No
185225	Gean, Gloria	No
184879	Gemmill, Arlene	No
184640	Genelli, Tom	No
184873	George, Daniel	No
185353	Gettman, Catherine	No
185325	Gettman, Catherine	No
184907	Kept Private	No
185296	Gibson, Dorothy	No
184775	Kept Private	No
184243	Kept Private	No
184781	Kept Private	No
184864	Kept Private	No
184760	Goan, Melissa E	No
185103	Kept Private	No
185440	Goldberg, Sandy	No
185065	Kept Private	No
185112	Kept Private	No
184974	Kept Private	No
184980	Kept Private	No
184298	Gray, J c	No
184988	Kept Private	Yes (184961)
184960	Grosjean, M Bruce	No
184682	Kept Private	No
185091	Haavimb, Kerstin M	No
185315	Hagen, Rita	No

184948	Haggerty, Timothy K	No
185276	Hague, Joe	No
184933	Hale, Travis	No
184940	Kept Private	No
185109	Ham, Randall E	No
184971	Hancock, Melissa	No
185035	Hanson, Sonja	No
185403	Hanson, Sonja	No
185400	Harper, Kathleen	No
184945	Kept Private	No
185217	Harrison, Janet	No
185212	Harrison , Janet	No
185211	Harrison , Janet	No
184604	Kept Private	No
185107	Kept Private	No
185053	Heiligman, Margot S	No
185347	Heinemann, Nancy	No
185278	Heller, Margaret	No
185358	Henderson, Simon	No
184645	Kept Private	No
184698	Kept Private	No
185349	Hochschild, Christie	No
185332	Hock, Sue	No
184865	Kept Private	No
183945	Kept Private	No
185283	Horning, Linda	No
184896	Hosemann, Robert P	No
184697	Kept Private	No
185308	Howard, Gordon	No
185306	Howard, Maureen	No
185096	Kept Private	No
185302	Hufz, Alan	No
185207	Hughes, Susan	No
184931	Kept Private	No
185205	Hunter, Elizabeth	No
185028	Hurtig, Barbara G	No
184882	Huston, Whitney	No
185433	Ilene Pittin, Renee	No
185305	Isoda, Shigero	No
184935	Kept Private	No
184804	Jasper, Marilyn	No
185194	Jay, Hu	No
184647	Jay, Meg	No

184620	Jensen, Lauris C	No
184943	jiao, fan	No
185288	Joachim, Sandy	No
184828	Kept Private	No
184687	Kept Private	No
185333	Johnston, Richard	No
184857	Kahan, Jane	No
184818	Kept Private	No
185413	Kales, Nancy	No
185458	Kales, William	No
185084	Kept Private	No
185019	Kept Private	Yes (184961)
185003	Kept Private	No
185422	Keating, John	No
185269	Kefauver, Lindsay	No
165502	Kept Private	No
184688	Kept Private	No
185330	Ketlemon Zagant, Margaret	No
185443	Kieselhorst, Donald	No
184983	Kept Private	Yes (184961)
185090	kirshbaum, stacy r	No
184917	Kept Private	No
184977	Kept Private	Yes (184961)
184740	Kept Private	No
184905	Kept Private	Master (184905)
184852	Kott, Amy	No
185343	Kraus, Krandall	No
184930	Kept Private	No
184854	Kept Private	No
184838	LaBrie, Michael	No
187683	Lafferty, Kevin	No
187686	Lafferty, Kevin	No
185067	Kept Private	No
185052	Kept Private	No
184972	Kept Private	No
185068	Kept Private	No
184694	Leppard, Nancy J	No
184833	Leveille, Simone	No
185089	Kept Private	No
185341	Lim, Donald	Yes (185209)
185102	Kept Private	No
184554	Lorella, Rose P	No
185108	Kept Private	No

184824	Kept Private	No
184827	Lyss, Steven	No
184970	Kept Private	Yes (184961)
185100	MACKENZIE, DAVID M	No
184810	Mahoney, Michael P	No
184994	Maloney, Philip J	No
185272	Malospina, Doreen	No
184610	Kept Private	No
184817	Mather, Vivien	No
185309	Matien, Kathleen	No
185113	Maxwell, Kasie	No
185114	Kept Private	No
185423	Maykel, Ron	No
185456	Kept Private	No
185300	McBaine, Susan	No
185419	McCarthy, Susan	No
185327	Kept Private	No
184932	Kept Private	No
185034	Kept Private	No
184796	Kept Private	No
184600	Kept Private	No
185427	McKay, Linda	No
184295	McLane, James	No
185178	McMeekin, Maureen	No
185399	Meisel, Claire	No
185268	Merijohn, George	No
185273	Merijohn, George	No
184985	meyers, pam	No
184976	Kept Private	No
185286	Michels, Alan	No
185287	Michels, Altavese	No
185092	Kept Private	No
185066	Kept Private	No
184714	miller, judith	No
185242	Miller, Judith	No
185256	Miller, Judith	No
184785	Miller, Luana S	No
185406	Miranda, N/A	No
184840	Kept Private	No
184978	Moeller, Lisa E	No
185434	Moffett, Ursula	No
184990	Kept Private	Yes (184961)
184952	Kept Private	No

184861	Kept Private	No
185409	Morlin, Lucinda	No
185042	Morlin , Lucinda and Michael	No
184835	Morris, Suzanne M	No
185338	Moss, Jennifer	Master (185338)
185233	Moss, Miriam	No
184961	Kept Private	Master (184961)
185270	Munks, Peter	No
185082	Kept Private	No
184845	Murphy, Caroline M	No
184934	Murphy, Dan	No
185002	Murphy, Dan	No
185069	Kept Private	No
185342	Murphy, Michael	Yes (185209)
185209	Murphy, Sheigla	Master (185209)
184805	Murphy , Michael	No
185208	N/A, N/A	No
185271	N/A, N/A	No
185274	N/A, N/A	No
185275	N/A, N/A	No
185281	N/A, N/A	No
185282	N/A, N/A	No
185285	N/A, N/A	No
185311	N/A, N/A	No
185404	N/A, N/A	No
185445	N/A, N/A	No
185452	N/A, N/A	No (185452)
185336	N/A, Tessa	No
184717	Nadler, Susan M	No
184718	Nadler, Susan M	No
184745	Nakayoshi, April A	No
185182	Needham Shields, Mai	No
185221	Nelson, Dorian	No
184609	Newcome , Pete	No
184837	Kept Private	No
185199	Nina, Goodwin	No
185201	no name, No name	No
184567	Noda, Rod	No
184580	Noda, Rod	No
185397	Noda, Rodney	No
185206	none, Elizabeth	No
185408	Kept Private	No
184829	Kept Private	No

184982	O'Donnell, Arthur	No
185363	O'Neil, Brian	No
185210	O'Neil, Sarah	Yes (185209)
185010	Kept Private	No
185360	Orris, David	No
185184	Otsea, Marion	No
185101	Kept Private	No
185097	Kept Private	No
184959	Kept Private	No
185023	Pao, Tina	No
185231	Paphitis, George	No
185048	Kept Private	No
184999	Kept Private	No
184878	Kept Private	No
185000	Kept Private	No
185070	Kept Private	No
184967	Kept Private	No
185055	Pierre, John	No
184979	Pinter, Margaret	No
185007	Kept Private	No
185011	Kept Private	No
185014	Kept Private	No
184454	Kept Private	No
184593	Kept Private	No
185072	Kept Private	No
184294	Kept Private	No
185026	Kept Private	No
185228	Potter, Curtis	No
184946	Kept Private	No
184552	Kept Private	No
184808	Ramsey, Robert A	No
165339	Rector, H M	No
165340	Rector, H M	No
184813	Kept Private	No
184814	Kept Private	No
185095	Kept Private	No
184430	Kept Private	No
184830	Kept Private	No
185190	Reinhold, Teresa	No
185214	Reiss, Hayden	No
185405	Reynolds, Kelsey	No
165522	richardson, karen	No
185356	Robb, Harvey	No

184953	Kept Private	No
185204	Robus, Marion	No
184944	Kept Private	No
184834	Rodgers, Tom L	No
185362	Rohan, Mary	No
184811	Kept Private	No
185361	Roncella, Ailine	No
184228	ROSEBERRY, Walt	No
185093	Kept Private	No
184957	Kept Private	No
185104	Kept Private	No
185384	Ruebstahl, Joanne	No
185046	Kept Private	No
184641	Salisbury, Sharon J	No
185259	Samii, Deborah	No
184761	Kept Private	No
185437	Sanders, Phyllis	No
184782	Sandoval, Cynthia	No
185331	Sasaki, Masahite	No
185339	Sawyer, Esq, Christopher	Yes (185209)
184175	Kept Private	No
185047	Scheff, Lisa	No
185027	Kept Private	No
185020	Schlund, Claus	No
184954	Kept Private	No
184951	Kept Private	No
185038	Kept Private	No
184806	schwartz , andy	No
185277	Scully, Delphia	No
184713	Kept Private	No
184683	Kept Private	No
185087	shea, susan	No
185071	Shepard, Jane C	No
185219	Sherman, Jill	No
185351	Sherwood, Linda	No
185106	Kept Private	No
185079	Kept Private	No
184556	Kept Private	No
185297	Small, Mary	No
185345	Smith, Barbara	No
184968	Kept Private	Yes (184961)
185417	Smith, Megan	No
184841	Kept Private	No

184973	Kept Private	Yes (184961)
185420	Solari, Nancy	No
185215	Solomon, Sevy	No
184783	spitz, marcia	No
185371	Stafford, Nancy	No
184877	Kept Private	No
184807	Steinman, Nina	No
185450	Stevens, Sally	No
184297	Kept Private	No
184909	Stone, Sylvia	No
185428	Stringer, Margaret	No
185224	Strobel , Jeanine E	No
185083	Kept Private	No
185344	Summerford, Christine	No
185354	Sweet, Sara	No
185077	Taboada, Joseph R	No
185049	Kept Private	No
185340	Tan, Samson	Master (185340)
184910	Kept Private	No
185213	Thurber, Rick	No
185088	Kept Private	No
185415	Tilden, Mary	No
184863	Kept Private	No
185004	Tooker, Lori E	No
184778	Torrisi, Michael P	No
185086	Kept Private	No
184871	tran, cam t	No
185116	Tucci, John	No
184859	Ulbrich, Beverly J	No
184589	unk, unk	No
184860	Vaernet, Peter	No
185117	Valente, Suzanne M	No
185076	Kept Private	No
184876	Vanderham, Jo	No
185257	Velez, Paula	No
185099	Vittori, Lisa	No
185119	Vittori, Lisa	No
184986	Kept Private	No
185118	Kept Private	No
184024	Wallace, Sophie	No
184832	Wardell, David	No
184831	Wardell, Dominique	No
185295	Webb, Kent	No

184950	Kept Private	No
185294	Wells, Dan	No
184335	Kept Private	No
185410	Wetzel, Kim	No
184920	Kept Private	No
184836	Kept Private	No
185227	Wiekel, Wendy	No
185074	Wilford, Linda M	No
184998	Kept Private	No
185094	Kept Private	No
185081	Kept Private	No
184739	Kept Private	No
185430	Wong, Benita	No
183919	Kept Private	No
185121	Woodman, Jane B	No
184763	Kept Private	No
184779	Yeung, Pauline	No
185426	Younger, Diane	No
185401	Yungert, Monika	No
185355	Zimmerman, Alan	No
184777	Zlatunich, Matthew	No

## APPENDIX 3. INDEX BY ORGANIZATION TYPE

Org. Type	Organization Name	Corr. ID	Code(s)
<b>Business</b>			
	West Wind Dog Training	187675	AL4000
<b>Conservation/ Preservation</b>			
	Black Point Environmental Action Committee	185258	GC2000
	California Native Plant Society- Yerba Buena Chapter	185416	GC4010, PO1000, VC1010
	Center for Biological Diversity	184964	RF1000, VU4010
		184965	PN2000, RF1000
		185016	PO4050, TE5000
		185018	RF1000, WH4050
		185022	GC2000, RF1000, TE2000
		185030	AW1000, LU3000, PN2000, RF1000, VE4060
		185057	AL4000, AW1000, LP1000, RF1000, WH4050
		187667	AG1000, AL4000, AW1000, CC2000, VS4050
		187669	AG1000, AL4000, AW1000, LU2000, LU3000, PN11000, PN4000, PO1000, TE5000, VE4050, VS4050, VS4060, WH4050
		187673	AL4000, AW1000, RF1000, VU1000, VU4010, WH4050, WH5000
		187678	LU2000, LU3000, LU4000, TE5000, VR5000, WH4050, WH5000
		187697	RF1000
		187698	RF1000
	Golden Gate Audubon Society	185441	AL1000, PN1000, PN8000, PN9000, VU4020, WH4050
	NPCA	187674	AG1000, AL4000
	National Parks Conservation Association	185222	AG1000, LP1000
	Sequoia Audubon Society	185411	AL4000, GC4000, PO4050, VC11000
	The Marin Humane Society	185220	AL4000, GC1000, VE4050
<b>Non-governmental</b>			
	ASPCA	187676	AL4000
	American Humane Association	187693	AW1000, VS4050
	Dogs Deserve Better	187677	AL4000
	Friends of Animals	187679	AL4000, WH5000
	Guide Dog Users Inc	187672	AL4000, VS4060
	PETA	187684	AL4000
<b>Recreational Groups</b>			
	CalDOG	185085	AL4000, GA1000, LU1000, LU3000, ON1100, PN1000, PN2000, SE4000, TE2000, VS2000, VU2000, WQ4000
	Crissy Field Dog Group	185421	AL4000, AL5000, GA3000, ON1100, PN2000, PN4000, VS2000, VS4050, VU4010, VU5000, WH2000, WH5000
	Dog Adventures	184936	AW1000, GC1000
	Sacramento Council of Dog Clubs	187685	AL4000
	The Crissy Field Dog Group	185240	GC1000

<b>State Government</b>			
	California State Senate	187681	AL4000
<b>Town or City Government</b>			
	City and County of San Francisco	187682	AL4000
		187680	AL4000
		187689	AL4000
<b>Unaffiliated Individual</b>			
	Citizen/Pet Owner	184948	AL4000
	Crissy Field Dog Group	184640	AL4000, AW1000
	D5Dog, SFDog	185034	GC1000, ON1000, VE4050
	Dog Owner	184808	GC3000, VU4010
		185026	AW1000
	DogpacSF	185060	AL5000, GC1000
	FF dog walkers	184906	GC1000, VE4050
	Fort Funston Dog Walkers	184966	GC1000
	GGA Conservation Committee	184777	AL4000, PN2000, PN4000, PN8000, VS2000, VS4050, WH4050
	Golden Gate Audubon	185028	AL4000, WH4050
	Nature in the City	184996	AL4000, VS1010, VU4050
	Ocean Beach DOG	185117	CC2000, GC4000
	PEF	184981	AL4000, GC1000, VE4050
	Resident	184994	GC1000, VU4050
	SFDOG Owners	185053	GC1000, ON1100
	SFPUC	184910	VE4050, WH4050
	SPFN	184972	CC2000, GC2000, VE4050
	Safe Parks Advocates	185061	GC2000, VE4050, VS4050
	Safe parks for kids	184932	AL4000, VE4050, VR2050, VS4050, VU4010, WH4050
	Self	184918	GC2000, VC6000, VC9000, WH4050
	The Pooch Coach	184859	AW1000, GC1000
	Urban Estuary Project	184879	GC4010, VC6000, VC11000, WH4050
	citizen	184697	GC1000, VE4050
		185051	GC3000
	local user	184778	AL4000, AW1000, VC1010, VC1110, WH4050
	none	184481	AL4000, AW1000, PO4050
	self	185048	AL4000, VS4050
	self/SF resident	184920	AL4000
	N/A	165339	AL4000, GC1000
		165340	AL4000, PN2000
		165386	AL4000, GC2000
		165502	AL4000, GC1000
		165522	AL4000
		183919	AL4000, AL5000
		183945	AL4000, GC4010
		183951	AL4000, GC1000
		183957	AL4000, LU1000
		184024	AL4000, VS4050
		184175	VS4050
		184243	AL4000, GC1000
		184294	GC2000, VC9000, VU4010, VU4020
		184295	AL4000, VS4050

Public Scoping Comment Summary Report

	184296	AL4000, GC1000, VU4010, WH4050
	184297	AW1000, GA2000, VE4050, VU4010
	184298	GA1000, PO4050, VU4010
	184335	AL4000, GC2000, VC1010, VE4050, VS4050
	184430	AL4000, GC4000, VC1010
	184454	AL4000, AL5000, LU1000
	184552	AL4000, GC1000
	184553	AL4000
	184554	AL4000
	184556	GC2000, VE4050, VU4050
	184567	AL4000, WH4050
	184588	GC1000
	184589	VU4010
	184591	GC4000
	184593	GC2000, WH4050
	184600	TE5000
	184604	VE4050
	184605	AL4000
	184609	GC1000
	184610	AW1000, PO4050, VU4010
	184614	GC1000
	184620	GC1000, VE4050
	184641	AL4000, GC1000
	184643	AL4000, GC1000
	184645	GC1000, VU4010
	184647	GC1000, VE4050
	184682	GC1000, VU4010
	184683	AW1000
	184687	AL4000, GC1000
	184688	GC1000
	184689	GC1000, VU1000
	184690	GC1000
	184694	GC1000, VE4050
	184698	AL4000, GC1000, WH4050
	184708	AW1000, VE4050
	184712	GC1000, LU1000
	184713	AW1000, GC1000
	184716	GC2000, VE4050
	184717	AL4000, GC1000, VE4050
	184733	GC1000, VE4050
	184734	GC1000
	184736	GC1000
	184737	GC1000, VE4050
	184739	VS4050, VU4010
	184740	GC1000, VU4010
	184745	VE4050, VS4050, WH4050
	184749	GC1000
	184753	GC1000, VE4050, VS4050, VU4010
	184760	AL4000
	184761	AW1000, GC1000
	184763	AW1000, VU4050

Public Scoping Comment Summary Report

	184773	GC1000, VU4020
	184774	GC1000
	184775	GC1000, VU4010
	184779	VU4010
	184781	AW1000, GC1000
	184782	AL4000, AW1000, GC1000
	184783	VC1010, VE4050
	184785	AL4000, GC1000
	184790	GC1000, VU4010, VU4050
	184796	GC1000, VE4050, VU4050
	184803	GC1000, ON1100, VC1010
	184804	VS4050, WH4050
	184805	GC1000
	184807	AW1000, GC1000, VE4050
	184810	AL4000
	184811	GC1000
	184812	GC1000, VU4010
	184813	AW1000, GC4000
	184814	GC4000
	184815	GC4010, VC11000
	184817	AL4000, PO4050, VU4010, WH4050
	184818	AL4000, GC1000, VU4050
	184824	GC1000, VE4050, VU4010
	184825	GC1000
	184826	GC1000
	184827	GC1000
	184828	GC1000
	184829	AL4000, GC1000, WH4050
	184830	AL4000, VU4050
	184831	AL5000, VU4010
	184832	GC1000, ON1000
	184833	GC1000, LU1000, ON1000
	184834	AL4000, PN2000, VU4010
	184835	GC1000, VE4050, VU4010
	184836	GC1000
	184837	GC1000
	184838	GC1000, VE4050, VU4010
	184839	AL4000, GC1000, VE4050, VS4050
	184840	AW1000, GC1000
	184841	AL4000, GC1000
	184844	GA1000
	184845	GC1000
	184852	AW1000, GC1000
	184854	AL4000, AL5000, GA1000, LU1000, SE4000, VC1110, VE4050, VS4050, VU4050
	184857	AW1000, GC1000
	184858	AL4000
	184860	AL4000, VS4050
	184861	AL4000, WH4050
	184862	VC9000, VE4050, VS4050
	184863	GC1000, VE4050, VU4010

Public Scoping Comment Summary Report

		184864	AL4000, VS4050, VU1000, VU4010
		184865	GA1000, GC2000, PO4050, TE5000, VE4050, VS4050, WH4050
		184870	AL4000, GC1000, VS4050, VU4010
		184871	GC2000, VE4050, VS4050, VU4010
		184872	GC1000, VU4010
		184873	TE5000, VU4020, WH4050
		184875	AL4000
		184876	AL4000, AW1000, VU4020
		184877	GC1000, VE4050, VU4050
		184878	AW1000, GC1000, VE4050
		184881	GC1000
		184882	GC1000, VE4050
		184883	AL1000, TE2000, WH2000, WH5000
		184896	AL4000, GA3000
		184905	AL1000, GA1000, VC1010, VC11000, WH4050
		184907	AW1000, GC1000, VU4010
		184909	ON1100, VC11000
		184917	AL4000, GC4000, ON1000, VU4050
		184926	AL4000, VC1010, VS4050, WH4050
		184928	AW1000, GC1000, VS4050, VU4050
		184930	GC1000, VU4010
		184931	AL1000, GA1000, VC11000, WH4050
		184933	GC1000, LU1000, VE4050
		184934	AL4000, PN1000, PN8000, PN9000, VC1010, WH4050
		184935	AL1000, GA1000, VC11000, WH4050
		184938	AW1000, GC1000, VC1110, VE4050, VS4050, VU4050
		184940	WH4050
		184941	AW1000, GC1000, VE4050, VS4050
		184942	AL4000, GC2000, PN2000, WH4050
		184943	GC1000, VU4010
		184944	VC11000
		184945	GC4010, VE4050
		184946	AW1000, GC1000, VE4050, VS2000, VU4010
		184950	GA3000
		184951	VU4010
		184952	AL4000, GC1000
		184953	AL4000, GA3000, VS2000, VS4050
		184954	GC4000
		184956	AL4000, GC1000, LU1000
		184957	GC2000, VS4050, WH4050
		184958	GC1000
		184959	AL4000, GC4000, WH4050
		184960	PN4000, VS4050
		184961	AL5000, GC1000, PN8000, PN9000
		184962	WH4050
		184963	GC1000
		184967	AL1000, AL4000, GA1000, VS4050, WH2000, WH4050

Public Scoping Comment Summary Report

		184968	AL4000, AL5000, AW1000, PN8000, PO1000, PO4050, VE4050, VU1000, VU4050
		184971	GC1000, VE4050, VU4050
		184974	VE4050, VU4010
		184976	GC1000, VU1000
		184978	AL5000, VU4050
		184979	AL4000, VE4050
		184980	GC1000
		184982	GC1000, VU4010
		184984	PN1000, VE4050, VU4050
		184985	AL5000, GC1000
		184986	GC1000
		184987	AL4000, VU4050
		184988	AL5000, GC1000, PN8000, PN9000, VE4050
		184989	GC1000, VE4050
		184991	AL4000, VU4010
		184992	AL5000, ON1000, VE4050, VU4010
		184993	VU4010
		184997	AL5000, GC1000, LU1000
		184998	GC1000
		184999	AL5000
		185000	AW1000, VU4050
		185001	AL4000
		185002	ON1100
		185003	AL1000, AL5000, CC2000, PO4050, VU1000
		185004	AL4000, GC1000, VE4050, VU4010, VU4050
		185005	AL5000, GC1000
		185007	AL4000, AW1000, GC2000, VE4050, VU4010
		185009	CC2000, LU1000, VE4050
		185010	AL5000, AW1000, GC1000
		185011	RF1000, VU4010
		185014	AL4000, AW1000, GC2000
		185020	AL5000, PO4050
		185021	GC1000, LU1000
		185023	AW1000, VU4010
		185024	GC2000, LP1000, LU1000, PO1000, VU4020, WH4050
		185027	AL5000, GC1000, GC3000
		185033	GC1000, VU4010
		185035	AL4000, GC1000, VU4050
		185036	GC1000
		185037	GC1000
		185038	VS4050
		185039	GC1000, VU4020
		185040	GC1000
		185042	GC1000
		185043	VU4010
		185045	AL5000, GC1000
		185046	GC1000
		185047	GC4000, VU4050
		185049	GC3000, VU4010
		185052	AL5000

Public Scoping Comment Summary Report

	185055	VC1010, VC9000, VU4010
	185056	GC2000, VS4050
	185058	AW1000, GC1000
	185059	AW1000, GC1000
	185062	AL4000
	185063	VU4010
	185065	WH4050
	185066	GC1000, VE4050
	185067	PN6000
	185068	GC1000, VU4010
	185069	PN1000, PO4050, VU4010
	185070	GC4000, PN2000
	185071	AL5000
	185072	AL4000, VC1110, VU4010, VU4050
	185074	AL4000, GA3000, VS4050
	185075	VE4050, WH4050
	185076	GC1000, VU4050
	185077	GC1000, GC4000
	185078	AW1000, VU4050
	185079	AL5000, AW1000, GC1000, VE4050
	185081	AL5000
	185082	GC1000, VE4050, VU4050
	185083	GC1000, ON1100, VC1110
	185084	VE4050, VU4010
	185086	AW1000, GC1000
	185087	GC4000
	185088	AL5000, GA3000, ON1000, VE4050
	185089	GC2000, PO4050, VS4050, VU4010, WH4050
	185090	AL5000, GC1000
	185091	AL5000, GC1000, LU1000
	185092	AW1000, GC1000
	185093	AL4000, GC3000
	185094	VU4010
	185095	PN6000, VU4010
	185096	PN9000
	185097	AL4000, AW1000
	185098	GC1000, LU1000, VE4050
	185099	ON1100
	185100	AL4000, RF1000, VS4050, WH4050
	185101	AL4000, GC4000
	185102	AL1000, GA1000, GC2000, GC4010, PN4000, TE5000, VC1010, VC11000, VU4020, WH4050
	185103	GC1000, VE4050
	185104	GC2000
	185105	GA3000, ON1100
	185106	AL5000, CC2000
	185107	GC2000, VC1010, VS4050
	185108	CC2000, GA2000, GC1000
	185109	GC1000, VE4050
	185110	GC1000
	185111	GC1000

Public Scoping Comment Summary Report

		185112	GC1000
		185113	AL1000, AL5000, CC2000, GC1000, ON1000, ON1100, PN1000, VU4010
		185115	AW1000, GC1000, VE4050
		185116	AW1000, VU4010
		185118	AL4000, GC1000, GC4000, WH4050
		185119	GC1000, PN2000, PN4000
		185120	AL1000, AL5000
		185178	AL5000, VU4010
		185181	AW1000, GC3000
		185182	AL4000, GC1000
		185183	AW1000, GC1000, VE4050
		185184	GC1000, LU1000
		185185	GA3000, GC1000, VS4050
		185187	PN8000, RF1000, SE4000
		185194	AW1000, GC1000, VE4050, VU4010
		185198	GA3000, VU4010
		185199	GA3000, VE4050
		185200	ON1100, VS4050
		185201	AL4000, GA2000, GA3000, PN9000, VU4050
		185204	GC4000, VU4010
		185205	PO4050, WH4050
		185206	GC1000, VE4050, VU4010
		185207	AW1000, GC1000, VU4010
		185208	GC1000, VE4050
		185209	AW1000, GC1000, VU4010
		185210	AW1000, VU4010
		185211	GA1000, WH4050
		185212	GC4010, VE4050, WH4050
		185213	VU4050, WH4050
		185214	VS4050, VU4010
		185215	CC2000, RF1000, VS4050
		185216	CC2000, GC4010, ON1100
		185217	GC4010, PN11000
		185219	CC2000, GC1000, PN1000, PN4000
		185221	GC4010, WH4050
		185223	AW1000, GC1000, VU4010
		185224	VU4010, WH4050
		185225	VS4050
		185226	AL4000, GC4000
		185227	AL4000
		185228	GC3000
		185231	AL5000, CC2000, LU1000
		185233	VE4050
		185237	AL4000, PN9000, PO4050, VC6000
		185256	AL4000, VU4010, WH4050
		185257	AL4000, VE4050, VU4050
		185259	AL4000, AW1000, GA2000
		185268	AL4000, GA3000, PN8000
		185269	AL4000, AL5000, CC2000, ON1100, VE4050
		185270	AL4000, VU4050, WH2000

Public Scoping Comment Summary Report

	185271	AL5000, GC1000
	185272	PO4050, VU4010
	185273	VC1010, VU4010, WH4050
	185274	WH4050
	185275	GC1000
	185276	GC1000
	185277	AL4000, GC4000, VU4020
	185278	AL4000
	185279	WH4050
	185280	GC1000, VU4010, VU4050
	185281	PN9000, PO4050
	185282	VU4010
	185283	GC1000, LU1000, WH4050
	185284	AL4000
	185285	GA1000, GC1000
	185286	AW1000, PN8000
	185287	GA3000
	185288	AL4000, GC1000
	185290	AL4000, GC1000, VU4020
	185293	AL4000, VU4020
	185294	VU4010
	185295	VS4050, VU4010
	185296	AL4000, GC4010
	185297	GC4010, VE4050, WH4050
	185298	AL4000
	185299	VU4010
	185300	VS4050
	185302	GC1000, VU4010
	185303	GC1000, VU4020
	185304	AW1000, GC1000, VU4020
	185305	AL4000, VU4050
	185306	GC1000
	185308	GC1000
	185309	VU4050
	185311	AL4000, TE5000, VC9000
	185314	GC1000, LU1000
	185315	AL4000
	185325	VS4050, VU4010, VU4050
	185327	AL5000, GA3000, GC1000, ON1000, VU4010
	185330	AL4000
	185331	VC9000, VU4050
	185332	AL4000, GC1000
	185333	VC9000
	185335	GC1000, LU1000
	185336	GC1000
	185338	AW1000, GC1000, VU4010
	185339	AW1000
	185340	AW1000, VU4010
	185343	GC1000, VE4050
	185344	AW1000, VU4010
	185345	AW1000, GC1000, GC4000, VE4050, VS4050,

Public Scoping Comment Summary Report

		VU4010
	185346	AL5000, LU1000
	185347	GC1000, LU1000, VU4020
	185348	GC1000
	185349	GC1000, VS4050
	185350	GC1000, VU4010
	185351	AW1000, GC1000
	185352	AW1000, GC1000, VU4010
	185353	AW1000, GA2000, GA3000, VE4050
	185354	AW1000, GC1000
	185355	AW1000, VS4050
	185356	AL4000, GC2000, GC4010
	185358	AL4000, GC1000
	185361	GC1000
	185362	GC1000, VE4050
	185363	AL4000, VE4050
	185366	GC2000, VS4050, VU4010
	185367	GC1000, VU4010
	185368	GC1000, VE4050
	185371	AL4000, AL5000, GA3000, VE4050
	185383	AL4000, ON1100, RF1000, VU4010
	185384	AW1000
	185395	LU1000
	185397	AL4000, GC2000, VS4050, WH4050
	185398	AW1000, GC1000
	185399	GC1000, VU4050
	185400	GC1000
	185401	PN2000, VU4010
	185402	AW1000, GC1000
	185404	GC1000, LU1000, VU1000
	185405	GC1000, VU4010
	185406	GC1000, VC1110, VE4050, VU4010
	185408	VU4010
	185409	GC1000
	185410	AW1000, PN2000, VU4010
	185412	GC1000, LU1000
	185413	GC1000, ON1000, VE4050
	185414	AL4000, VE4050
	185415	AL4000, AW1000, LU1000, VS4050, VU4010
	185417	GA1000, GC1000, LU1000, VE4050
	185419	TE5000, VC1010, VS4050, WH2000, WH4050
	185420	VU4010, VU4050
	185422	ON1100
	185423	AW1000, GC2000, VC9000, VU4010, WH4050
	185426	PN2000, VU4010
	185427	AL1000, VE4050, VS2000, VS4050, VU4050
	185428	GA2000, GC1000, VE4050, VU4010
	185429	AL4000, AL5000, AW1000, GC1000, LU1000, PN4000, VS4050, VU4050
	185430	AL4000, VU4010
	185431	AL4000, ON1100, PN9000, VU4010

*Public Scoping Comment Summary Report*

		185433	LU1000, ON1100, PN1000, PN4000, VU4050
		185434	AL1000, AL4000, GC1000, GC4000, VU4010, VU4050
		185436	AL5000, LU1000, VU4010, VU4050
		185437	GC1000, VE4050, VU4050, WH4050
		185440	AL4000, PN4000, PO1000, VC1010, VE4050
		185443	AL4000, AL5000, GA1000, VU4010
		185445	AL4000, GA3000, LP1000, LU1000, PN2000, PN7000, PN8000, PN9000, RF1000, SE4000, VS4050, VU2000, VU4050, WH4050
		185450	AL5000, AW1000, GA2000, ON1100, RF1000, SE4000, VC1110, VE4050, VU4010
		185452	AL4000, AW1000, CC2000, GA3000, LU1000, LU3000, ON1100, PN2000, PN7000, PO4050, SE4000, WH2000
		185454	GC1000, ON1100, VE4050, VS4050, VU4050
		185456	GA1000
		185458	AL5000, GC1000, PN4000
		187683	WH4050
		187686	TE5000
		187690	LU4000
		187691	LU3000
		187692	AW1000
		187699	AW1000, RF1000, TE5000

**APPENDIX 4. INDEX BY CODE**

**AG1000 - Agency Rulemaking: Need for Emergency Action**

Center for Biological Diversity - 187667, 187669  
NPCA - 187674  
National Parks Conservation Association - 185222

**AL1000 - Alternatives: Elements Common To All Alternatives**

Golden Gate Audubon Society - 185441  
Unaffiliated individual - 184883, 184905, 184931, 184935, 184967, 185003, 185102, 185113, 185120, 185427, 185434

**AL4000 - Alternatives: New Alternatives Or Elements**

ASPCA - 187676  
CalDOG - 185085  
California State Senate - 187681  
Center for Biological Diversity - 185057, 187667, 187669, 187673  
Citizen/Pet Owner - 184948  
City and Country of San Francisco - 187682  
City and County of San Francisco - 187680, 187689  
Crissy Field Dog Group - 184640, 185421  
Dogs Deserve Better - 187677  
Friends of Animals - 187679  
GGA Conservation Committee - 184777  
Golden Gate Audubon - 185028  
Guide Dog Users Inc - 187672  
NPCA - 187674  
Nature in the City - 184996  
PEF - 184981  
PETA - 187684  
Sacramento council of dog clubs - 187685  
Safe parks for kids - 184932  
Sequoia Audubon Society - 185411  
The Marin Humane Society - 185220  
West Wind Dog Training - 187675  
local user - 184778  
none - 184481  
self - 185048  
self/SF resident - 184920  
Unaffiliated individual - 165339, 165340, 165386, 165502, 165522, 183919, 183945, 183951, 183957, 184024, 184243, 184295, 184296, 184335, 184430, 184454, 184552, 184553, 184554, 184567, 184605, 184641, 184643, 184687, 184698, 184717, 184760, 184782, 184785, 184810, 184817, 184818, 184829, 184830, 184834, 184839, 184841, 184854, 184858, 184860, 184861, 184864, 184870, 184875, 184876, 184896, 184917, 184926, 184934, 184942, 184952, 184953, 184956, 184959, 184967, 184968, 184979, 184987, 184991, 185001, 185004, 185007, 185014, 185035, 185062, 185072, 185074, 185093, 185097, 185100, 185101, 185118, 185120, 185182, 185201, 185226, 185227, 185237, 185256, 185257, 185259, 185268, 185269, 185270, 185277, 185278, 185284, 185288, 185290, 185293, 185296, 185298, 185305, 185311, 185315, 185330, 185332, 185356, 185358, 185363, 185371, 185383, 185397, 185414, 185415, 185429, 185430, 185431, 185434, 185440, 185443, 185445, 185452

**AL5000 - Alternatives: 1979 Pet Policy**

Crissy Field Dog Group - 185421  
DogpacSF - 185060

Unaffiliated individual - 183919, 184454, 184831, 184854, 184961, 184968, 184978, 184985, 184988, 184992, 184997, 184999, 185003, 185005, 185010, 185020, 185027, 185045, 185052, 185071, 185079, 185081, 185088, 185090, 185091, 185106, 185113, 185178, 185231, 185269, 185271, 185327, 185346, 185371, 185429, 185436, 185443, 185450, 185458

**AW1000 - Animal Welfare: Impact on/to dogs**

American Humane Association - 187693  
Center for Biological Diversity - 185057, 187667, 187669, 187673  
Crissy Field Dog Group - 184640  
Dog Adventures - 184936  
Dog Owner - 185026  
The Pooch Coach - 184859  
local user - 184778  
none - 184481

Unaffiliated individual - 184297, 184610, 184683, 184708, 184713, 184761, 184763, 184781, 184782, 184807, 184813, 184840, 184852, 184857, 184876, 184878, 184907, 184928, 184938, 184941, 184946, 184968, 185000, 185007, 185010, 185014, 185023, 185030, 185058, 185059, 185078, 185079, 185086, 185092, 185097, 185115, 185116, 185181, 185183, 185194, 185207, 185209, 185210, 185223, 185259, 185286, 185304, 185338, 185339, 185340, 185344, 185345, 185351, 185352, 185353, 185354, 185355, 185384, 185398, 185402, 185410, 185415, 185423, 185429, 185450, 185452, 187692, 187699

**CC2000 - Consultation and Coordination: Reg-Neg process**

Ocean Beach DOG - 185117  
SPFN - 184972  
Unaffiliated individual - 185003, 185009, 185106, 185108, 185113, 185215, 185216, 185219, 185231, 185269, 185452

**GA1000 - Impact Analysis: Impact Analyses**

CalDOG - 185085  
Unaffiliated individual - 184298, 184844, 184854, 184865, 184905, 184931, 184935, 184967, 185102, 185211, 185285, 185417, 185443, 185456

**GA2000 - Impact Analysis: Use Trends And Assumptions**

Unaffiliated individual - 184297, 185108, 185201, 185259, 185353, 185428, 185450

**GA3000 - Impact Analysis: General Methodology For Establishing Impacts/Effects**

Crissy Field Dog Group - 185421  
Unaffiliated individual - 184896, 184950, 184953, 185074, 185088, 185105, 185185, 185198, 185199, 185201, 185268, 185287, 185327, 185353, 185371, 185445, 185452

**GC1000 - Off-leash dogs: Support**

D5Dog, SFDog - 185034  
Dog Adventures - 184936  
DogpacSF - 185060  
FF dog walkers - 184906  
Fort Funston Dog Walkers - 184966  
PEF - 184981  
Resident - 184994  
SFDOG Owners - 185053  
The Crissy Field Dog Group - 185240  
The Marin Humane Society - 185220  
The Pooch Coach - 184859  
citizen - 184697

Unaffiliated individual - 165339, 165502, 183951, 184243, 184296, 184552, 184588, 184609, 184614, 184620, 184641, 184643, 184645, 184647, 184682, 184687, 184688, 184689, 184690, 184694, 184698, 184712, 184713, 184717, 184733, 184734, 184736, 184737, 184740, 184749, 184753, 184761, 184773, 184774, 184775, 184781, 184782, 184785, 184790, 184796, 184803, 184805, 184807, 184811, 184812, 184818, 184824, 184825, 184826, 184827, 184828, 184829, 184832, 184833, 184835, 184836, 184837, 184838, 184839, 184840, 184841, 184845, 184852, 184857, 184863, 184870, 184872, 184877, 184878, 184881, 184882, 184907, 184928, 184930, 184933, 184938, 184941, 184943, 184946, 184952, 184956, 184958, 184961, 184963, 184971, 184976, 184980, 184982, 184985, 184986, 184988, 184989, 184997, 184998, 185004, 185005, 185010, 185021, 185027, 185033, 185035, 185036, 185037, 185039, 185040, 185042, 185045, 185046, 185058, 185059, 185066, 185068, 185076, 185077, 185079, 185082, 185083, 185086, 185090, 185091, 185092, 185098, 185103, 185108, 185109, 185110, 185111, 185112, 185113, 185115, 185118, 185119, 185182, 185183, 185184, 185185, 185194, 185206, 185207, 185208, 185209, 185219, 185223, 185271, 185275, 185276, 185280, 185283, 185285, 185288, 185290, 185302, 185303, 185304, 185306, 185308, 185314, 185327, 185332, 185335, 185336, 185338, 185343, 185345, 185347, 185348, 185349, 185350, 185351, 185352, 185354, 185358, 185361, 185362, 185367, 185368, 185398, 185399, 185400, 185402, 185404, 185405, 185406, 185409, 185412, 185413, 185417, 185428, 185429, 185434, 185437, 185454, 185458

**GC2000 - Off-leash dogs: Oppose**

Black Point Environmental Action Committee - 185258

Center for Biological Diversity - 185022, 185064

SPFN - 184972

Safe Parks Advocates - 185061

Self - 184918

Unaffiliated individual - 165386, 184294, 184335, 184556, 184593, 184716, 184865, 184871, 184942, 184957, 185007, 185014, 185024, 185056, 185089, 185102, 185104, 185107, 185356, 185366, 185397, 185423

**GC3000 - General Comment: Support current management**

Dog Owner - 184808

citizen - 185051

Unaffiliated individual - 185027, 185049, 185093, 185181, 185228

**GC4000 - General Comment: Continue to allow dogs within GGNRA**

Ocean Beach DOG - 185117

Sequoia Audubon Society - 185411

cheese plus - 184851

Unaffiliated individual - 184430, 184591, 184813, 184814, 184917, 184954, 184959, 185047, 185070, 185077, 185087, 185101, 185118, 185204, 185226, 185277, 185345, 185434

**GC4010 - General Comment: Ban all dogs from GGNRA**

California Native Plant Society- Yerba Buena Chapter - 185416

Urban Estuary Project - 184879

Unaffiliated individual - 183945, 184815, 184945, 185102, 185212, 185216, 185217, 185221, 185296, 185297, 185356

**LP1000 - Laws and Policies: Impact of GGNRA actions on other NPS units' enforcement of servicewide policies and regulations**

Center for Biological Diversity - 185057

National Parks Conservation Association - 185222

Unaffiliated individual - 185024, 185445

**LU1000 - Land Use: Policies and Historical Use**

CalDOG - 185085

Unaffiliated individual - 183957, 184454, 184712, 184833, 184854, 184933, 184956, 184997, 185009, 185021, 185024, 185091, 185098, 185184, 185231, 185283, 185314, 185335, 185346, 185347, 185395, 185404, 185412, 185415, 185417, 185429, 185433, 185436, 185445, 185452

**LU2000 - Other Agencies Policies and mandates Regarding Dog Management**

Center for Biological Diversity - 187669, 187678

**LU3000 - Land Use: Dog Parks Provided by San Francisco and Other Municipalities**

CalDOG - 185085

Center for Biological Diversity - 187669, 187678

Unaffiliated individual - 185030, 185452, 187691

**LU4000 - Land Use: San Francisco Significant Natural Resources Area Management Plan**

Center for Biological Diversity - 187678

Unaffiliated individual - 187690

**ON1000 - Other NEPA Issues: General Comments**

D5Dog, SFDog - 185034

Unaffiliated individual - 184832, 184833, 184917, 184992, 185088, 185113, 185327, 185413

**ON1100 - Other NEPA Issues: Scope of planning process**

CalDOG - 185085

Crissy Field Dog Group - 185421

SFDOG Owners - 185053

Unaffiliated individual - 184803, 184909, 185002, 185083, 185099, 185105, 185113, 185200, 185216, 185269, 185383, 185422, 185431, 185433, 185450, 185452, 185454

**PN1000 - Purpose And Need: Planning Process And Policy**

CalDOG - 185085

Golden Gate Audubon Society - 185441

Unaffiliated individual - 184934, 184984, 185069, 185113, 185219, 185433

**PN11000 - Purpose And Need: Other Policies And Mandates**

Center for Biological Diversity - 187669

Unaffiliated individual - 185217

**PN2000 - Purpose And Need: Park Purpose And Significance**

CalDOG - 185085

Crissy Field Dog Group - 185421

GGA Conservation Committee - 184777

Unaffiliated individual - 165340, 184834, 184942, 184965, 185030, 185070, 185119, 185401, 185410, 185426, 185445, 185452

**PN4000 - Purpose And Need: Park LegislatioUnaffiliated individualuthority**

Center for Biological Diversity - 187669

Crissy Field Dog Group - 185421

GGA Conservation Committee - 184777

Unaffiliated individual - 184960, 185102, 185119, 185219, 185429, 185433, 185440, 185458

**PN6000 - Purpose And Need: Land Management Laws, Exec Orders**

Unaffiliated individual - 185067, 185095

**PN7000 - Purpose and Need: Adequacy of EIS Purpose and Need**

Unaffiliated individual - 185445, 185452

**PN8000 - Purpose And Need: Objectives In Taking Action**

GGA Conservation Committee - 184777

Golden Gate Audubon Society - 185441

Unaffiliated individual - 184934, 184961, 184968, 184988, 185187, 185268, 185286, 185445

**PN9000 - Purpose And Need: Issues And Impact Topics Selected For Analyses**

Golden Gate Audubon Society - 185441

Unaffiliated individual - 184934, 184961, 184988, 185096, 185201, 185237, 185281, 185431, 185445

**PO1000 - Park Operations: Guiding Policies, Regs And Laws**

California Native Plant Society- Yerba Buena Chapter - 185416

Center for Biological Diversity - 187669

Unaffiliated individual - 184968, 185024, 185440

**PO4050 - Park Operations: Impacts of No Action/Current Conditions**

Center for Biological Diversity - 185016

Sequoia Audubon Society - 185411

none - 184481

Unaffiliated individual - 184298, 184610, 184817, 184865, 184968, 185003, 185020, 185069, 185089, 185205, 185237, 185272, 185281, 185452

**RF1000 - References: General Comments**

Center for Biological Diversity - 185018, 185022, 185057, 187673, 187697, 187698

Unaffiliated individual - 184964, 184965, 185011, 185030, 185100, 185187, 185215, 185383, 185445, 185450, 187699

**SE4000 - Socioeconomics: Impact Of Proposal And Alternatives**

CalDOG - 185085

Unaffiliated individual - 184854, 185187, 185445, 185450, 185452

**TE2000 - Threatened And Endangered Species: Methodology And Assumptions**

CalDOG - 185085

Center for Biological Diversity - 185022

Unaffiliated individual - 184883

**TE5000 - Threatened and Endangered Species: Impact of No Action/ Current Conditions**

Center for Biological Diversity - 185016, 187669, 187678

Unaffiliated individual - 184600, 184865, 184873, 185102, 185311, 185419, 187686, 187699

**TE6000 - Threatened and Endangered Species: Cumulative Actions and Effects**

Center for Biological Diversity - 187678

**VC1010 - Affected Environment: Impacts to multiple resources**

California Native Plant Society- Yerba Buena Chapter - 185416

Nature in the City - 184996

local user - 184778

Unaffiliated individual - 184335, 184430, 184783, 184803, 184905, 184926, 184934, 185055, 185102, 185107, 185273, 185419, 185440

**VC11000 - Affected Environment: Species Of Special Concern**

Sequoia Audubon Society - 185411  
Urban Estuary Project - 184879  
Unaffiliated individual - 184815, 184905, 184909, 184931, 184935, 184944, 185102

**VC1110 - Affected Environment: Impacts to lands and parks surrounding GGNRA.**

local user - 184778  
Unaffiliated individual - 184854, 184938, 185072, 185083, 185406, 185450

**VC6000 - Affected Environment: Marine And Estuarine Resources**

Self - 184918  
Urban Estuary Project - 184879  
Unaffiliated individual - 185237

**VC9000 - Affected Environment: Vegetation**

Self - 184918  
Unaffiliated individual - 184294, 184862, 185055, 185311, 185331, 185333, 185423

**VE4050 - Visitor Experience: Impacts of No Action/Current Conditions**

Center for Biological Diversity - 187669  
D5Dog, SFDog - 185034  
FF dog walkers - 184906  
PEF - 184981  
SFPUC - 184910  
SPFN - 184972  
Safe Parks Advocates - 185061  
Safe parks for kids - 184932  
The Marin Humane Society - 185220  
citizen - 184697  
Unaffiliated individual - 184297, 184335, 184556, 184604, 184620, 184647, 184694, 184708, 184716, 184717, 184733, 184737, 184745, 184753, 184783, 184796, 184807, 184824, 184835, 184838, 184839, 184854, 184862, 184863, 184865, 184871, 184877, 184878, 184882, 184933, 184938, 184941, 184945, 184946, 184968, 184971, 184974, 184979, 184984, 184988, 184989, 184992, 185004, 185007, 185009, 185066, 185075, 185079, 185082, 185084, 185088, 185098, 185103, 185109, 185115, 185183, 185194, 185199, 185206, 185208, 185212, 185233, 185257, 185269, 185297, 185343, 185345, 185353, 185362, 185363, 185368, 185371, 185406, 185413, 185414, 185417, 185427, 185428, 185437, 185440, 185450, 185454

**VE4060 - Visitor Experience: Role of Park in Providing Visitors an Experience of Areas where Dogs are Not Allowed**

Unaffiliated individual - 185030

**VR2050 - Vegetation and Riparian Areas: Impacts of No Action/Current Conditions**

Safe parks for kids - 184932

**VR5000 - Vegetation and Riparian Areas: Cumulative Actions and Effects**

Center for Biological Diversity - 187678

**VS2000 - Visitor Conflicts And Safety: Methodology And Assumptions**

CalDOG - 185085  
Crissy Field Dog Group - 185421  
GGA Conservation Committee - 184777  
Unaffiliated individual - 184946, 184953, 185427

**VS4050 - Visitor Conflicts and Safety: Impacts of No Action/Current Conditions**

American Humane Association - 187693  
Center for Biological Diversity - 187667, 187669  
Crissy Field Dog Group - 185421  
GGA Conservation Committee - 184777  
Safe Parks Advocates - 185061  
Safe parks for kids - 184932  
self - 185048  
Unaffiliated individual - 184024, 184175, 184295, 184335, 184739, 184745, 184753, 184804, 184839, 184854, 184860, 184862, 184864, 184865, 184870, 184871, 184926, 184928, 184938, 184941, 184953, 184957, 184960, 184967, 185038, 185056, 185074, 185089, 185100, 185107, 185185, 185200, 185214, 185215, 185225, 185295, 185300, 185325, 185345, 185349, 185355, 185366, 185397, 185415, 185419, 185427, 185429, 185445, 185454

**VS4060 - Visitor Conflicts and Safety: Aspects of Visitor Conflicts on Guide Dogs/ Service Dogs**

Center for Biological Diversity - 187669  
Guide Dog Users Inc - 187672

**VU1000 - Visitor Use: Guiding Policies, Regs And Laws**

Center for Biological Diversity - 187673  
Unaffiliated individual - 184689, 184864, 184968, 184976, 185003, 185404

**VU2000 - Visitor Use: Methodology And Assumptions**

CalDOG - 185085  
Unaffiliated individual - 185445

**VU4010 - Visitor Use: Actions of dog owners**

Center for Biological Diversity - 187669, 187673  
Crissy Field Dog Group - 185421  
Dog Owner - 184808  
Safe parks for kids - 184932  
Unaffiliated individual - 184294, 184296, 184297, 184298, 184589, 184610, 184645, 184682, 184739, 184740, 184753, 184775, 184779, 184790, 184812, 184817, 184824, 184831, 184834, 184835, 184838, 184863, 184864, 184870, 184871, 184872, 184907, 184930, 184943, 184946, 184951, 184964, 184974, 184982, 184991, 184992, 184993, 185004, 185007, 185011, 185023, 185033, 185043, 185049, 185055, 185063, 185068, 185069, 185072, 185084, 185089, 185094, 185095, 185113, 185116, 185178, 185194, 185198, 185204, 185206, 185207, 185209, 185210, 185214, 185223, 185224, 185256, 185272, 185273, 185280, 185282, 185294, 185295, 185299, 185302, 185325, 185327, 185338, 185340, 185344, 185345, 185350, 185352, 185366, 185367, 185383, 185401, 185405, 185406, 185408, 185410, 185415, 185420, 185423, 185426, 185428, 185430, 185431, 185434, 185436, 185443, 185450

**VU4020 - Visitor Use: Professional dog walkers**

Golden Gate Audubon Society - 185441  
Unaffiliated individual - 184294, 184773, 184873, 184876, 185024, 185039, 185102, 185277, 185290, 185293, 185303, 185304, 185347

**VU4050 - Visitor Use: Impacts of No Action/Current Conditions**

GGA Conservation Committee - 184777  
Nature in the City - 184996  
Resident - 184994  
Unaffiliated individual - 184556, 184763, 184790, 184796, 184818, 184830, 184854, 184877, 184917, 184928, 184938, 184968, 184971, 184978, 184984, 184987, 185000, 185004, 185035, 185047, 185072, 185076, 185078, 185082, 185201, 185213, 185257, 185270, 185280, 185305, 185309, 185325, 185331,

185399, 185420, 185427, 185429, 185433, 185434, 185436, 185437, 185445, 185454

**VU5000 - Visitor Use: Cumulative Impacts**

Crissy Field Dog Group - 185421

**WH2000 - Wildlife And Wildlife Habitat: Methodology And Assumptions**

Crissy Field Dog Group - 185421

Unaffiliated individual - 184883, 184967, 185270, 185419, 185452

**WH4050 - Wildlife and Wildlife Habitat: Impact of No Action/Current Conditions**

Center for Biological Diversity - 185018, 185057, 187669, 187673, 187678

GGA Conservation Committee - 184777

Golden Gate Audubon - 185028

Golden Gate Audubon Society - 185441

SFPUC - 184910

Safe parks for kids - 184932

Self - 184918

Urban Estuary Project - 184879

local user - 184778

Unaffiliated individual - 184296, 184567, 184593, 184698, 184745, 184804, 184817, 184829, 184861, 184865, 184873, 184905, 184926, 184931, 184934, 184935, 184940, 184942, 184957, 184959, 184962, 184967, 185024, 185065, 185075, 185089, 185100, 185102, 185118, 185205, 185211, 185212, 185213, 185221, 185224, 185256, 185273, 185274, 185279, 185283, 185297, 185397, 185419, 185423, 185437, 185445, 187683

**WH5000 - Wildlife and Wildlife Habitat: Cumulative Actions and Effects**

Center for Biological Diversity - 187673, 187678

Crissy Field Dog Group - 185421

Friends of Animals - 187679

Unaffiliated individual - 184883

**WQ4000 - Water Resources: Impact Of Proposal And Alternatives**

CalDOG - 185085