

From: "Levitt, Howard" howard_levitt@nps.gov
Subject: April 29, 2016 at 1:01 PM America/Los_Angeles
Date: Wendy Scheffers howandwen@(b) (b)
To:



--
Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
415-561-4730

Attachments:
[FOIA NPS 2016 00154 Stephens acknowledgement.docx](#) (57.27 kB)

From: Howard Levitt and Wendy Scheffers howandwen@nps.gov (b) (6)
Subject: Fwd:
Date: April 29, 2016 at 1:02 PM America/Los_Angeles
To: Neal Desai ndesai@npca.org



----- Forwarded message -----

From: Levitt, Howard <howard_levitt@nps.gov>
Date: Fri, Apr 29, 2016 at 1:01 PM
Subject:
To: Wendy Scheffers <howandwen@nps.gov (b) (6) >

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Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
[415-561-4730](tel:415-561-4730)

Attachments:

[FOIA NPS 2016 00154 Stephens acknowledgement.docx](#) (57.27 kB)

From: Neal Desai ndesai@npca.org
Subject: another request - san mateo related
Date: July 09, 2015 at 2:55 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Howard,

Where do I obtain the dog walking regulations that were on GGNRA San Mateo lands at the time they were acquired by NPS. I could use this ASAP, either through telling me where I could find it via phone or pointing me to any documents where I could find them, such as the SDEIS. Thanks,

Neal

From: Neal Desai ndesai@npca.org
Subject: RE: another request - san mateo related
Date: July 09, 2015 at 3:20 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Per below email, I need to know the status of dog walking on these specific properties at the time of acquisition:

San Mateo County

Currently On leash:

- Milagra Ridge trails
- Mori Point trails
- Rancho Corral de Tierra
- Sweeney Ridge trails, except for the Notch Trail which is closed to dog walking

Currently No dogs:

- Phleger Estate
- Notch Trail at Sweeney Ridge

From: Neal Desai
Sent: Thursday, July 09, 2015 2:53 PM
To: 'Howard Levitt and Wendy Scheffers'
Subject: another request - san mateo related

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Neal

From: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Subject: Re: another request - san mateo related
Date: July 09, 2015 at 9:44 PM America/Los_Angeles
To: Neal Desai ndesai@npca.org



Neal, on vacation near Yosemite... I assume your question is in regards to Speier's scary move. Best thing would be to contact Paul Ringgold at POST. He would know the rules POST applied before NPS acquired RCDT. I believe they permitted folks to walk dogs on RCDT, but never off-leash. SM Co Park rules are the most restrictive of any agency - no dogs in most parks, and never off leash. Those rules are still in effect. I believe I had sent you a doc that showed SM Co rules. I'll be back on Monday for a phone call. Thanks, as always, for your help.
Howard

On Thu, Jul 9, 2015 at 2:55 PM, Neal Desai <ndesai@npca.org> wrote:

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Neal

From: Neal Desai ndesai@npca.org
Subject: Re: another request - san mateo related
Date: July 09, 2015 at 9:46 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers [<howandwen@\(b\) \(6\)>](mailto:howandwen@(b) (6))



Sounds good. Let's follow up Monday morning if possible. Enjoy Yosemite!!

On Jul 9, 2015, at 9:44 PM, "Howard Levitt and Wendy Scheffers" [<howandwen@\(b\) \(6\)>](mailto:howandwen@(b) (6)) wrote:

Neal, on vacation near Yosemite... I assume your question is in regards to Speier's scary move. Best thing would be to contact Paul Ringgold at POST. He would know the rules POST applied before NPS acquired RCDT. I believe they permitted folks to walk dogs on RCDT, but never off-leash. SM Co Park rules are the most restrictive of any agency - no dogs in most parks, and never off leash. Those rules are still in effect. I believe I had sent you a doc that showed SM Co rules. I'll be back on Monday for a phone call. Thanks, as always, for your help.
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Neal

From: Amy Meyer amy7w2m@**(b) (6)**
Subject: Change.org petition
Date: February 27, 2016 at 3:28 PM America/Los_Angeles
To: Neal Desai ndesai@npca.org, BeckyE rebecca@**(b) (6)** **(b) (6)** Alan Carlton
carltonal@**(b) (6)** **(b) (6)**, wsheplaw WSHEPLAW**(b) (6)**



According to my neighborhood electronic newsletter, Save Our Recreation has a Change.org petition.

(Alan, "Wsheplaw" above is Bill Shepard, head of NAPP, Neighborhood Associations for Presidio Planning)

Save Our Recreation

21h ago

Patti Twain from NE Outer Richmond

There is a new proposed law to limit dogs in GGNRA, which will affect everyone who enjoys our recreational areas.

"The proposed general management policy will deny significant public use for longstanding activities like hiking, surfing, bike riding, horseback riding, and dog walking... Erecting fences, barriers and compliance signs to foil – and ticket – "trespassers" who cause no harm on land that belongs to all of us achieves no good outcome."

Please review and consider signing the petition at "Change.org". Search for "access to the golden gate recreation area."

Edited 8h ago · Shared with NE Outer Richmond + 5 nearby neighborhoods in General

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www.amywmeyer.com

From: Amy Meyer amy7w2m@**(b) (6)**
Subject: Correct # of GGNRA visitors.URGENT
Date: February 22, 2016 at 5:56 PM America/Los_Angeles
To: howandwen@**(b) (6)**
Cc: Neal Desai ndesai@npca.org



Howard: Neal is using 14.9 million

I heard Chris use 17 million

We need ONE accurate figure right away that we all agree on.

Thanks,
Amy

--

www.amywmeyer.com

From: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Subject: Doc of interest
Date: July 01, 2015 at 1:43 PM America/Los_Angeles
To: Amy Meyer a7w2m@**(b) (6)**, **(b) (6)**, ndesai@npca.org, rebecca@**(b) (6)**



Amy, Neal, and Becky:

Here's something I believe you were interested in seeing. More to come. Respond only to this home email address.

HL

Attachments:

[DOC002.pdf](#) (59.88 kB)

From: Amy Meyer a7w2m@(b) (6)
Subject: Re: Doc of interest
Date: July 01, 2015 at 1:55 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Thank you, HL. On Jul 1, 2015, at 1:43 PM, Howard Levitt and Wendy Scheffers wrote: > Amy, Neal, and Becky: > > Here's something I believe you were interested in seeing. More to come. Respond only to this home email address. > > HL > > > Amy Meyer www.amymeyer.com

From:

A

Amy Meyer a7w2m@(b) (6)

Subject:

Re: Doc of interest

Date:

July 01, 2015 at 3:14 PM America/Los_Angeles

To:

Howard Levitt and Wendy Scheffers howandwen@(b) (6)

Cc:

Neal Desai ndesai@npc.org, Becky Evans rebecca@ (b) (6)

Howard, Now that I've had a chance to study this chart and see how dogs are walking/not walking in various places, what's obviously missing and which I'm sure you'll send us next is how GGNRA's proposed Dog Management Plan provides for them with the same kind of numbers. We will not have a meeting with Dan Bernal until probably the week of July 20. Having these comparative figures all together equivalently will be very useful. Amy On Jul 1, 2015, at 1:43 PM, Howard Levitt and Wendy Scheffers wrote: > Amy, Neal, and Becky: > > Here's something I believe you were interested in seeing. More to come. Respond only to this home email address. > > HL > > >

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Howard Levitt and Wendy Scheffers howandwen@(b) (6)

Subject:

Re: Doc of interest

Date:

July 01, 2015 at 5:52 PM America/Los_Angeles

To:

Amy Meyer a7w2m@(b) (6), ndesai@npc.org, rebecca@ (b) (6)

CONFIDENTIAL.

More.

Howard

On Wed, Jul 1, 2015 at 1:43 PM, Howard Levitt and Wendy Scheffers <howandwen@(b) (6)> wrote:

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Here's something I believe you were interested in seeing. More to come. Respond only to this home email address.

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Date:

July 01, 2015 at 5:54 PM America/Los_Angeles

To:

Amy Meyer [\(b\) \(6\)](mailto:a7w2m@(b) (6)) ndesai@npcs.org, rebecca@[\(b\) \(6\)](mailto:(b) (6))

CONFIDENTIAL

More.

Howard

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CONFIDENTIAL.

More.

Howard

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Amy, Neal, and Becky:

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HL

Attachments:

[Background.docx](#) (14.5 kB)

[Neighboring agencies.doc](#) (32.5 kB)

From:

A

Amy Meyer [\(b\) \(6\)](mailto:a7w2m@(b) (6))

Subject:

Re: Doc of interest

Date:

July 07, 2015 at 11:10 AM America/Los_Angeles

To:

Howard Levitt and Wendy Scheffers [\(b\) \(6\)](mailto:howandwen@(b) (6))

Howard,

The background document you sent is helpful and we have edited it to suit our needs.

But the Neighboring Agencies paper, while helpful, does not give any comparison with what

GGNRA is offering. Chris pointed out that the dog people say they are only getting to use 1% of the GGNRA. But the GGNRA only controls 13,000 acres of its 80,000. And much of the land is unsuited for people to walk on as well as dogs. We don't need a percent, but we do have to be able to show clearly how GGNRA stacks up against the others.

It isn't necessary to use the same format as the Neighboring Agencies paper, but only to have a paper for GGNRA so as to clearly make comparisons.

We have a meeting with Dan Bernal on Monday July 13.

We need something to show this comparison at that meeting. We plan to send him the Background paper and the Neighboring Agencies paper in advance, this Friday. It would be best to have the comparison paper to send in with the other two.

Amy

On Jul 1, 2015, at 5:54 PM, Howard Levitt and Wendy Scheffers <[<howandwen@\(b\) \(6\)>](mailto:howandwen@(b) (6))> wrote:

CONFIDENTIAL

More.

Howard

On Wed, Jul 1, 2015 at 5:52 PM, Howard Levitt and Wendy Scheffers <[<howandwen@\(b\) \(6\)>](mailto:howandwen@(b) (6))> wrote:

CONFIDENTIAL.

More.

Howard

On Wed, Jul 1, 2015 at 1:43 PM, Howard Levitt and Wendy Scheffers <[<howandwen@\(b\) \(6\)>](mailto:howandwen@(b) (6))> wrote:

Amy, Neal, and Becky:

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HL

<Background.docx><Neighboring agencies.doc>

From:

B
BeckyE [<rebecae@\(b\) \(6\)>](mailto:rebecae@(b) (6))

Subject:

Re: Doc of interest

Date:

July 07, 2015 at 11:23 AM America/Los_Angeles

To:

Amy Meyer [a7w2m@\(b\) \(6\)](mailto:a7w2m@(b) (6)) Howard Levitt and Wendy Scheffers
[howandwen@\(b\) \(6\)](mailto:howandwen@(b) (6))

From: Amy Meyer amy7w2m@(b) (6)
Subject: dog comment sample
Date: February 26, 2016 at 4:54 PM America/Los_Angeles
To: howandwen@(b) (6)



Adam Green from Sea Cliff

17h ago

As someone with three dogs, I'm all in favor of restricting dogs.

The problem is the arrogant, self-entitled, obstinately righteous "dog lover" owners, not the dogs. The dogs are fine, even the most poorly socialized dogs that want to bark and bite, it's not the dog, it's the human.

But the restrictions on dogs will give back the beaches to habitat, the wildlife and the people.

It's not just the negligent dog walkers, it's not just the bites, attacks, hospitalizations from severe and permanent injuries, it's not the kids stepping in poop or the damage to the environment, or the indigenous wildlife massacres caused by domesticated cats and dogs, it's all of these plus those imbeciles buying Pit Bulls and other aggressive species as personal weapons.

I'd really like to walk along the beach (or around Lake Tahoe) without having to worry about protecting my children from aggressive dogs or, as happened recently, shooing away a dog that was off-leash and got into the belongings of someone as they were in the lake, then it pissed on their clothes and towels, then I shooed it away again and again till, half an hour later, the "owner" wandered by and pretended to be a dog lover. It's not the dogs, it's the damn owners that think dogs are "people" or even equal to people.

As someone allergic to dogs (yes, you really have to love your dog to be allergic and want to be with him or her ... I'm a mess for half a day after I wash one of our dogs ... runny nose, itchy eyes ... but when that mutt can't rest until he has positioned himself to rest his chin on my foot, it's all worth it times ten ... well, times three, let's say ...) anyway, as someone concerned about health and hygiene, I'm insulted and offended by people carrying their dogs into supermarkets and public spaces or having them in or around cafes -- they're no better than smokers.

It's high time for dog owners to get a clue and stop imposing their lifestyle upon others.

From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: Re: dog comment sample
Date: February 26, 2016 at 9:34 PM America/Los_Angeles
To: Amy Meyer amy7w2m@(b) (6)



This is a great letter. Yes, we have to find a way to get these letters into the record. On Monday, I'll send you a link to pass on to people who comment on the neighborhood blog.

On Feb 26, 2016, at 4:54 PM, Amy Meyer wrote:

[Adam Green](#) from Sea Cliff

17h ago

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It's high time for dog owners to get a clue and stop imposing their lifestyle upon others.

From: Amy Meyer amy7w2m (b) (6)
Subject: Dog comments
Date: February 26, 2016 at 4:51 PM America/Los_Angeles
To: howandwen@ (b) (6)



Howard,

There is a computer-based newsletter in my neighborhood. There are several comments posted today about dog management. They generally favor regulation. I don't know these people and wonder how we can use their comments.

One way would be to post the announcement of the Rule document in the newsletter and the comment period and ask people to let the park know what they are thinking on the official form. If so, please send me a clean copy so I can forward it to the newsletter.

Another way would be to make copies of what is said— but if so, where do I send them?

Amy

--

www.amywmeyer.com

From: Amy Meyer a7w2m@(b) (6)
Subject: Dog Management
Date: September 10, 2015 at 10:14 AM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Cc: Neal Desai ndesai@npca.org, Becky Evans rebecca@(b) (6)



Howard, I have collected one good dog management letter from a neighbor of Sutro Heights Park. It is addressed to you and Chris and it is not electronic but was mailed to me with just your names on it and no park address. Since you wrote yesterday that the best estimate for the Dog Management draft rule is now early November, the subject will not be on the September agenda of P4P/P, and for now I don't see the need to meet about it. But my having one letter brings up the best way to give the park letters to present to the public and legislators. I expect there will be some kind of electronic form attached to the Draft Rule when it is released and that should get a lot of responses from both sides. But in soliciting letters in advance to support the need for a Rule from the people who don't deal with details but are hot about unpleasant dog stories— a process that takes lots of personal contact and time— am I right in thinking that addressing the letters to Chris and you, and getting them sent to me, Becky, or Neal, by snail mail or e-mail, and our passing them on to you is what you will need to begin a pile of letters of support. Please share with us any thoughts you may have as to anything productive we may do during this waiting period. Amy

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To: Amy Meyer a7w2m@ (b) (6)
Cc: Neal Desai ndesai@npca.org, Becky Evans rebecca@ (b) (6)



CONFIDENTIAL Dear Amy (and Neal and Becky, too): Thank you for getting some momentum going on this. Yes, letters addressed to Chris asking her to be firm on protecting park resources and allowing for those who don't want a dog experience would be very useful. Cc to Rep Pelosi would also be good, because she is the one we need to stay away from this issue. Dan Bernal and Robert Edmonson need to be able to report to Nancy that there is a very sizable cohort who do not want Golden Gate to become a dog park. Whenever you three feel up to it, I know Chris and I would like to meet to talk about a strategy to activate non-dog advocates to make their voices heard on the Draft Rule. In deep appreciation. Howard On Sep 10, 2015, at 10:14 AM, Amy Meyer wrote: > Howard, > > I have collected one good dog management letter from a neighbor of Sutro Heights Park. It is addressed to you and Chris and it is not electronic but was mailed to me with just your names on it and no park address. > > Since you wrote yesterday that the best estimate for the Dog Management draft rule is now early November, the subject will not be on the September agenda of P4P/P, and for now I don't see the need to meet about it. > > But my having one letter brings up the best way to give the park letters to present to the public and legislators. I expect there will be some kind of electronic form attached to the Draft Rule when it is released and that should get a lot of responses from both sides. But in soliciting letters in advance to support the need for a Rule from the people who don't deal with details but are hot about unpleasant dog stories— a process that takes lots of personal contact and time— am I right in thinking that addressing the letters to Chris and you, and getting them sent to me, Becky, or Neal, by snail mail or e-mail, and our passing them on to you is what you will need to begin a pile of letters of support. > > Please share with us any thoughts you may have as to anything productive we may do during this waiting period. > > Amy > > >

From: Amy Meyer a7w2m@(b) (6)
Subject: Re: Dog Management
Date: September 11, 2015 at 9:48 AM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Cc: Neal Desai ndesai@npca.org, Becky Evans rebecca@(b) (6)



Howard, Please send all addresses to use, both electronic and snail mail. That makes it easy to inform people and get them moving. Is a Pelosi copy of a letter to Chris best sent locally or to Robert Edmonson or both (easy enough electronically)? If you and Chris will offer us a choice of 3 times to meet next, I'm sure we can agree on one of them. Amy On Sep 10, 2015, at 9:35 PM, Howard Levitt and Wendy Scheffers wrote: > > CONFIDENTIAL > > Dear Amy (and Neal and Becky, too): > > Thank you for getting some momentum going on this. Yes, letters addressed to Chris asking her to be firm on protecting park resources and allowing for those who don't want a dog experience would be very useful. Cc to Rep Pelosi would also be good, because she is the one we need to stay away from this issue. Dan Bernal and Robert Edmonson need to be able to report to Nancy that there is a very sizable cohort who do not want Golden Gate to become a dog park. Whenever you three feel up to it, I know Chris and I would like to meet to talk about a strategy to activate non-dog advocates to make their voices heard on the Draft Rule. > > In deep appreciation. > > Howard > > On Sep 10, 2015, at 10:14 AM, Amy Meyer wrote: > >> Howard, >>> I have collected one good dog management letter from a neighbor of Sutro Heights Park. It is addressed to you and Chris and it is not electronic but was mailed to me with just your names on it and no park address. >>> Since you wrote yesterday that the best estimate for the Dog Management draft rule is now early November, the subject will not be on the September agenda of P4P/P, and for now I don't see the need to meet about it. >>> But my having one letter brings up the best way to give the park letters to present to the public and legislators. I expect there will be some kind of electronic form attached to the Draft Rule when it is released and that should get a lot of responses from both sides. But in soliciting letters in advance to support the need for a Rule from the people who don't deal with details but are hot about unpleasant dog stories— a process that takes lots of personal contact and time— am I right in thinking that addressing the letters to Chris and you, and getting them sent to me, Becky, or Neal, by snail mail or e-mail, and our passing them on to you is what you will need to begin a pile of letters of support. >>> Please share with us any thoughts you may have as to anything productive we may do during this waiting period. >>> Amy >>> >>>

From: H
Howard Levitt and Wendy Scheffers howandwen@npca.org (b) (6)
Subject: Re: Dog Management
Date: September 11, 2015 at 6:31 PM America/Los_Angeles
To: Amy Meyer a7w2m@npca.org (b) (6)
Cc: Neal Desai ndesai@npca.org, Becky Evans rebecca@npca.org (b) (6)

Thanks, Amy. Should have added Chris's info: Christine Lehnertz, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, California 94123 chris_lehnertz@nps.gov Will send you some dates next week. Have a great weekend. Howard On Sep 11, 2015, at 9:48 AM, Amy Meyer wrote: > Howard, > > Please send all addresses to use, both electronic and snail mail. That makes it easy to inform people and get them moving. > > Is a Pelosi copy of a letter to Chris best sent locally or to Robert Edmonson or both (easy enough electronically)? > > If you and Chris will offer us a choice of 3 times to meet next, I'm sure we can agree on one of them. > > Amy > > > On Sep 10, 2015, at 9:35 PM, Howard Levitt and Wendy Scheffers wrote: > >> CONFIDENTIAL >>> Dear Amy (and Neal and Becky, too): >>> Thank you for getting some momentum going on this. Yes, letters addressed to Chris asking her to be

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Cc:

Amy Meyer a7w2m@nps.gov (b) (6) Neal Desai ndesai@npca.org, Becky Evans rebecae@nps.gov (b) (6)

Email to both Dan Bernal and Robert Edmonson is best. On Sep 11, 2015, at 6:31 PM, Howard Levitt and Wendy Scheffers wrote: > Thanks, Amy. Should have added Chris's info: >> Christine Lehnertz, General Superintendent > Golden Gate National Recreation Area > Building 201, Fort Mason > San Francisco, California 94123 >> chris_lehnertz@nps.gov >> Will send you some dates next week. >> Have a great weekend. >> Howard >> >> On Sep 11, 2015, at 9:48 AM, Amy Meyer wrote: >>> Howard, >>> >>> Please send all addresses to use, both electronic and snail mail. That makes it easy to inform people and get them moving. >>> >>> Is a Pelosi copy of a letter to Chris best sent locally or to Robert Edmonson or both (easy enough electronically)? >>> >>> If you and Chris will offer us a choice of 3 times to meet next, I'm sure we can agree on one of them. >>> >>> Amy >>> >>> On Sep 10, 2015, at 9:35 PM, Howard Levitt and Wendy Scheffers wrote: >>> >>>> CONFIDENTIAL >>> >>>> Dear Amy (and Neal and Becky, too): >>> >>>> Thank you for getting some momentum going on this. Yes, letters addressed to Chris asking her to be firm on protecting park resources and allowing for those who don't want a dog experience would be very useful. Cc to Rep Pelosi would also be good, because she is the one we need to stay away from this issue. Dan Bernal and Robert Edmonson need to be able to report to Nancy that there is a very sizable cohort who do not want Golden Gate to become a dog park. Whenever you three feel up to it, I know Chris and I would like to meet to talk about a strategy to activate non-dog advocates to make their voices heard on the Draft Rule. >>> >>>> In deep appreciation. >>> >>>> Howard >>> >>>> On Sep 10, 2015, at 10:14 AM, Amy Meyer wrote: >>> >>>>> Howard, >>>>> >>>>> I have collected one good dog management letter from a neighbor of Sutro Heights Park. It is addressed to you and Chris and it is not electronic but was mailed to me with just your names on it

From: Howard Levitt and Wendy Scheffers howandwen (b) (6)
Subject: Dog Mtg
Date: March 28, 2016 at 10:03 PM America/Los_Angeles
To: Louis Blumberg lblumberg@ (b) (6)



NR Personal

Re the Dog Mtg, location is the Hall of Flowers in GGP near 9th and Lincoln. Doors open at 5:45 PM, presentation and question period starts at 6:15 PM. Would love to hear a voice of reason. Main point we need to hear is that some of the public supports our mission of first protecting park resources and then accommodating recreation. Most of the dog folks who speak suggest that they are the primary users of the park. In fact, at most dog visits constitute 10-12% of total annual visitation throughout the park, though the % is higher in places like Fort Funston (up to 60%) and Crissy Field (up to 24%). Nevertheless, the NPS plan reflects a commonsense approach to allowing a variety of visitor experiences - with and without dogs - and protects resources, reduces conflicts, and makes the park cleaner and safer for everyone. Hope to see you tomorrow night! Howard

From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: Re: Dog Mtg
Date: March 28, 2016 at 10:10 PM America/Los_Angeles
To: Louis Blumberg lblumberg(b) (6)



NR Personal

[REDACTED] ove, Wendy On Mar 28, 2016, at 10:03 PM, Howard Levitt and Wendy Scheffers wrote: > Lou, > > NR Personal

[REDACTED] > Re the Dog Mtg, location is the Hall of Flowers in GGP near 9th and Lincoln. Doors open at 5:45 PM, presentation and question period starts at 6:15 PM. Would love to hear a voice of reason. Main point we need to hear is that some of the public supports our mission of first protecting park resources and then accommodating recreation. Most of the dog folks who speak suggest that they are the primary users of the park. In fact, at most dog visits constitute 10-12% of total annual visitation throughout the park, though the % is higher in places like Fort Funston (up to 60%) and Crissy Field (up to 24%). Nevertheless, the NPS plan reflects a commonsense approach to allowing a variety of visitor experiences - with and without dogs - and protects resources, reduces conflicts, and makes the park cleaner and safer for everyone. > > Hope to see you tomorrow night! > > Howard

From: Bern landsmiths@**(b) (6)**
Subject: dog rules offline conversation?
Date: March 24, 2016 at 8:56 PM America/Los_Angeles
To: "Howard Levitt & Wendy Scheffers" howandwen@**(b) (6)**



Hi Howard -

I'm about to have some time to dig into the docs and put some comments together (will likely tend toward the "still the most liberal policy re: dogs of any national park" and "for the many people who are uncomfortable around dogs, this sets out clear areas to avoid" sort of comments...

What do you think? should we meet for coffee? Or beer?

Bern

From: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Subject: Re: dog rules offline conversation?
Date: March 24, 2016 at 9:07 PM America/Los_Angeles
To: Bern landsmiths@**(b) (6)**



Yes! Let's meet sometime next week. How about Mon after work for a beer? Howard

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Subject: Re: dog rules offline conversation?
Date: March 24, 2016 at 9:09 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**



That works for me - what's a good spot for you (and secure for bike parking?)

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Bern

From: Howard Levitt and Wendy Scheffers [howandwen@\(b\) \(6\)](mailto:howandwen@(b) (6))
Subject: Re: dog rules offline conversation?
Date: March 25, 2016 at 11:23 AM America/Los_Angeles
To: Bern [landsmiths@\(b\) \(6\)](mailto:landsmiths@(b) (6))



Bern, can we make it lunch at FOMA instead - secure bike parking right inside our building? I will need to get home right after work on Monday? Howard

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Bern

From: Bern landsmiths@**(b) (6)**
Subject: Re: dog rules offline conversation?
Date: March 30, 2016 at 3:11 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**



Hi Howard -
Sorry I missed out on Monday
How about Thursday before work or at lunch?

Bern

On Fri, Mar 25, 2016 at 11:23 AM, Howard Levitt and Wendy Scheffers
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From: Howard Levitt and Wendy Scheffers [howandwen@\(b\) \(6\)](mailto:howandwen@(b) (6))
Subject: Re: dog rules offline conversation?
Date: March 30, 2016 at 3:22 PM America/Los_Angeles
To: Bern [landsmiths@\(b\) \(6\)](mailto:landsmiths@(b) (6))



Thurs will be jammed up because I will need to prep for the Pacifica mtg. Unless you're planning on attending the Pacifica mtg and making a comment there, let's push our get-together until the week of Apr 11 - comment period doesn't expire until 5/25. Some time the week of 4/11??
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From: Bern landsmiths@**(b) (6)**
Subject: Re: dog rules offline conversation?
Date: March 30, 2016 at 3:27 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**



Yeah that week works for me (next week I'll be at the state trails conference).

Cheers -
Bern

On Wed, Mar 30, 2016 at 3:22 PM, Howard Levitt and Wendy Scheffers
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What do you think? should we meet for coffee? Or beer?

Bern

From: Amy Meyer a7w2m@**(b) (6)**
Subject: Dogs with Becky's changes.
Date: July 14, 2015 at 11:40 AM America/Los_Angeles
To: Becky Evans rebecca@**(b) (6)**, Neal Desai ndesai@npca.org, Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**



Neal, you can work from this update from Becky.

Howard— I can't send this anywhere until the 7 or 8 issue is settled.

Becky— "Something else that is missing is that off-leash dog walking was not permitted under previous ownership." I was on the Rec Park Commission and owned a dog from 1962 on. There was no city regulation at all. It was when the NPS started to use the national park regulation that it became an issue. I don't understand why there are two limits for commercial dog walking. I don't know because the names of the remaining sites aren't given. There isn't enough trouble from the commercial walkers to worry about it — the problem is so much more the individual dog owners.

REWRITE Amy integrating Becky's changes:

1. Of the 407 areas of the National Park System, not one permits off-leash dogs, and it is a significant stretch for NPS to even consider off-leash dog use.
2. When Golden Gate National Recreation Area took over the ownership of most of the beach areas of San Francisco and southern Marin, the park's administration acknowledged the long tradition of off-leash dog recreation in those areas of the park. This led to a 1979 recommendation by the Federal Advisory Commission for the GGNRA that dogs be allowed off-leash in many areas of the park. GGNRA made that recommendation park policy.
3. By the mid-t990s, the damage caused by off-leash dogs to dunes, habitat, and wildlife had become evident. When the Advisory Commission tried to rescind the 1979 policy, dog owners went to court. The judge ruled there would have to be a formal public removal of the policy, instead of reverting to the national regulations. GGNRA petitioned the NPS regional and national directorate to allow development of a Special Rule for dog management, for this park only. This regulation would meet the preservation and recreation mandates of the park's legislation. This process, with extensive public input and several revisions, has been going on for 15 years. The damage to the park's resources has continued to increase, and dog owners feel ever more entitled to run their dogs off-leash.
4. GGNRA is required to consider the expectations of a broad array of national park users from all over the country and the world, not solely the interests of single-issue stakeholders. Of the 22 park sites originally evaluated for off-leash use, the 5 that are most contested are those which are popular with all users: Fort Funston, Ocean Beach, Crissy Field, Rodeo Beach, and Muir Beach. Under the proposed Special Rule, all but Muir Beach will have off-leash areas. The 7 off-leash areas will be Crissy Field, Fort Funston, and Fort Mason's Great Meadow— each will have 2 areas— and Ocean Beach and Rodeo Beach will each have 1 area— for a total of EIGHT
5. NPS carefully assessed every area governed by the 1979 Pet Policy They later reviewed key San Mateo County sites that were not owned or managed by the park in 1979, to determine if there were any areas where dogs could be permitted off leash without threatening wildlife and habitat, and which also permitted opportunities for those who want a dog-free experience. GGNRA identified 7 ?8 areas where they feel off-leash dog use can occur.

6. In addition to the 7 (8?) proposed off leash areas, there are 21 areas (including some that also permit off leash) that are proposed for on-leash dog walking.

7. Commercial dog walkers are limited to certain areas and are subject to a 3 dog maximum except on Fort Funston, Fort Mason, Baker Beach, and Crissy Field in San Francisco and Fort Baker, Rodeo Beach, and Alta Trail in Marin where they are subject to a 6 dog limit. The 6 dog limit is the same as that for the Presidio and the city parks in San Francisco. The dogs may be off-leash where otherwise permitted. NPS authority to permit this use is contested by several environmental groups.

Amy

From: Neal Desai ndesai@npca.org
Subject: RE: Dogs with Becky's changes.
Date: July 14, 2015 at 12:29 PM America/Los_Angeles
To: Amy Meyer a7w2m@ (b) (6); Becky Evans rebecca@ (b) (6); Howard Levitt and Wendy Scheffers howandwen@ (b) (6)



Amy, please see the attached that contains tracked changes edits. I included several statements, such as in many cases, the original land manager did not allow dog walking and that the 1979 pet policy did not consider scientific research or other park users.

Thank you very much for putting this info together. When you have a final set of 4 documents, can you please send them around to us for final review? At this point, it doesn't matter if we send Dan the info by 2 or by 5pm. Thanks!
neal

From: Amy Meyer [mailto:a7w2m@ (b) (6)]
Sent: Tuesday, July 14, 2015 11:41 AM
To: Becky Evans; Neal Desai; Howard Levitt and Wendy Scheffers
Subject: Dogs with Becky's changes.

Neal, you can work from this update from Becky.

Howard— I can't send this anywhere until the 7 or 8 issue is settled.

Becky— "Something else that is missing is that off-leash dog walking was not permitted under previous ownership." I was on the Rec Park Commission and owned a dog from 1962 on. There was no city regulation at all. It was when the NPS started to use the national park regulation that it became an issue. **I don't understand why there are two limits for commercial dog walking.** I don't know because the names of the remaining sites aren't given. There isn't enough trouble from the commercial walkers to worry about it — the problem is so much more the individual dog owners.

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Amy

Attachments:

[neal edits to dogs.docx](#) (19.1 kB)

More than a decade ago, the National Park Service began a public process that would allow for the Golden Gate National Recreation (GGNRA) to become the first and only national park site to welcome off-leash dogs. This unprecedented rule-making process made many national park lovers fear that the GGNRA would continue to be managed as a giant dog park, despite related negative impacts to park wildlife, plants, and visitors. After all, this was during a period when numerous decisions (e.g. snowmobiles in Yellowstone) were made by the Administration that conflicted with science and policy.

Fast-forward to today, the Park Service recently released a proposed dog management rule that follows the law, reflects scientific literature, and affirms that this special place will be managed for long-term public interest and the benefit of all Americans. This new rule updates a nearly 40-year old regulation that was created far before GGNRA became the most visited national park site, offering more diverse forms of recreation than any other in our entire park system. Naturally, since park visitation has grown to 17 million, conflicts between users have also increased.

The GGNRA is the backyard national park to many of us Bay Area residents, including me. It also contains more threatened and endangered species than Yellowstone, Yosemite and Sequoia-Kings Canyon National Parks, combined. This alarming statistic highlights the national importance of these lands and underscores the need to help species recover. GGNRA and all of our 411 National Park System sites are managed to the same standard of care regardless of its classification, such as National Park, National Battlefield, or National Recreation Area.

Such facts are inconvenient and often overlooked by those who would like to see unregulated off-leash dogs throughout our shared national parkland, including trails and picnic areas. Also inconvenient, scientific research does not conclude that impacts from off-leash dogs are beneficial to wildlife, plants, and their habitat.

Yet, the Park Service has recognized that all Americans are stakeholders in our national parks. Through a rigorous public engagement process that considered the views of all park visitors, not just one user group, the Park Service has proposed that it can responsibly accommodate on-leash and off-leash dog walking. The Park Service has successfully struck a balance in its plan that minimizes negative impacts on other park users and resources.

For more than two years, public documents have provided trail-by-trail and beach-by-beach analysis. The documents reference more than 20 studies regarding the negative impacts dogs have on natural resources.

Marin County Parks Department reports dog walking, including dog waste, as a top visitor complaint. Such data directly contradicts claims that conflicts between off-leash dogs and other park users and wildlife in nearby San Francisco or other parts of the country simply don't occur locally.

Already, various off-leash activists who oppose other local planning efforts (e.g. efforts to implement sustainable ranching at Point Reyes National Seashore and reduce traffic congestion at Muir Woods) have threatened to litigate the final dog rule. Such an approach is a disservice to all the other park visitors who would like to enjoy prime

parkland without dogs, or walk their leashed dog without being jumped on by an unknown off-leash dog.

This subject is clearly emotional because people love their dogs and therefore it may be difficult to imagine them harming other visitors or wildlife. But people also love their national parks and the Park Service has a legally-mandated mission to welcome all visitors and to preserve our local and national heritage for years to come. That balance can only be accomplished by the reasonable off-leash rules in the GGRNA plan.

From: Amy Meyer amy7w2m@**(b) (6)**
Subject: Format of the 6 meetings
Date: March 09, 2016 at 10:15 AM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Cc: Neal Desai ndesai@npca.org



Howard,
Thank you for the good conversation yesterday. And also for the delicious oranges!

Neal and I talked about the agreed-upon format with the questions collected as Huffman did. I want to tell you I had been thinking about the Huffman meeting as we talked. If I had made the suggestion, I could see why you should be worrying. But since Martha made the suggestion and since Christine and David both agreed with her it was very much an agreed-upon consensus of all. Which you can say if it becomes necessary.

Amy

--

www.amywmeyer.com

From: Howard Levitt and Wendy Scheffers howandwen(b) (6)
Subject: Re: Format of the 6 meetings
Date: March 09, 2016 at 10:40 AM America/Los_Angeles
To: Amy Meyer amy7w2m@(b) (6)
Cc: Neal Desai ndesai@npca.org



Thanks, Amy and Neal. As always, your presence (and Becky's and Noreen's) was crucial.

I agree completely with you that adjusting the "question" session format makes sense since it came from the dog folks. It was interesting that the corollary to extending the question session is the reduction/elimination of a general "statement" session, which no one seemed to have a problem with.

I've talked with my team about this, and we've identified an ideal staff person (Adrienne Freeman) to do the real-time sort of the questions. This shift will require us to have our experts ready to field questions and provide CONCISE answers to them. I believe this format change will give us our best shot at meetings that achieve the goal of clarifying the rule so that people can submit comments from a position of greater knowledge.

Onward.
Howard

On Wed, Mar 9, 2016 at 10:15 AM, Amy Meyer <[<amy7w2m@\(b\) \(6\)>](mailto:amy7w2m@(b) (6))> wrote:

Howard,

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Amy

--

www.amywmeyer.com

From: Amy Meyer amy7w2m@(b) (6)
Subject: Fwd: Correct # of GGNRA visitors.URGENT
Date: February 22, 2016 at 7:27 PM America/Los_Angeles
To: Neal Desai ndesai@npca.org
Cc: howandwen@(b) (6)



Neal

I would like to stand by 17.5 million. MUWO and FOPO are administered by GGNRA.

Is this OK with you?

Amy

----- Forwarded message -----

From: Howard Levitt and Wendy Scheffers <howandwen@(b) (6) >
Date: Monday, February 22, 2016
Subject: Correct # of GGNRA visitors.URGENT
To: Amy Meyer <amy7w2m@(b) (6) >
Cc: Neal Desai <ndesai@npca.org>

Neal is correct for GGNRA only - figure of 17.5 includes MUWO and FOPO. I explained this to Steve Rubenstein of the Chron and Mark Prado. They seemed to get it. I generally provide both GOGA's # initially, and then go on to point out that there are two other units under GOGA mgt, and the total was 17.5 in 2015, second highest in NPS.

On Mon, Feb 22, 2016 at 5:56 PM, Amy Meyer <amy7w2m@(b) (6) > wrote:

Howard: Neal is using 14.9 million

I heard Chris use 17 million

We need ONE accurate figure right away that we all agree on.

Thanks,
Amy

--

www.amywmeyer.com

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www.amywmeyer.com



From: Amy Meyer amy7w2m@ (b) (6)
Subject: Fwd: FYI re Speier and dog management plan: Responding to your message
Date: June 09, 2016 at 5:07 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@ (b) (6)

Howard,
I thought you'd like to see this.
Let me know if what Lennie has written is in tune with GGNRA's current perceptions.
Amy

----- Forwarded message -----

From: Lennie Roberts <lennie@darwin.ptvy.ca.us>
Date: Thu, Jun 9, 2016 at 3:47 PM
Subject: Re: FYI re Speier and dog management plan: Responding to your message
To: Amy Meyer <amy7w2m@ (b) (6)>
Cc: BeckyE <rebecae@ (b) (6)>, wsheplaw <WSHEPLAW@ (b) (6)>, Paul Wermer <paul@ (b) (6)>

Wow!

I think Jackie has stepped WAY back from previous statements in the press that were very pro-dog.

This was in the Half Moon Bay Review at the time of release of the Rule:

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I'm encouraged by her much more measured tone.

LR

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Lennie,

I know you don't live in Speier's district, but your Committee for Green Foothills ear is to the ground all over the Peninsula. I've had inquiries as to what this letter from Speier to one of her constituents might mean. She's done a couple of things that were ineffective re: dog management and I get the idea that while she's personally in favor of dogs off leash she is more making gestures than taking a hard stand against the proposed Special Rule. At least I hope that's what's happening...

Any insight?

Thanks,
Amy

----- Forwarded message -----

From: Paul Wermer <pw-sc_paul@ (b) (6)>
Date: Fri, Jun 3, 2016 at 12:33 PM
Subject: FYI re Speier and dog management plan: Responding to your message
To: Amy Meyer <amy7w2m@ (b) (6)>, Bill Shepard <WSHEPLAW@ (b) (6)>

----- Forwarded Message -----

Subject: Responding to your message
Date: Fri, 3 Jun 2016 14:30:07 -0400
From: Rep. Jackie Speier <CA14ima-113@mail.house.gov>
To: paul@ (b) (6)

JACKIE SPEIER
14TH DISTRICT, CALIFORNIA

211 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-0512
(202) 225-3531
FAX: (202) 226-4183

155 BOVET ROAD, SUITE 780
SAN MATEO, CA 94402
(650) 542-0300
FAX: (650) 375-8270

WWW.SPEIER.HOUSE.GOV

Congress of the United States
House of Representatives
Washington, DC 20515-0512

COMMITTEE ON ARMED SERVICES
SUBCOMMITTEES:
READINESS
OVERSIGHT AND INVESTIGATION
COMMITTEE ON OVERSIGHT AND
GOVERNMENT REFORM
SUBCOMMITTEES:
RANKING MEMBER, ENERGY POLICY, HEALTH CARE,
AND ENTITLEMENTS
NATIONAL SECURITY
GUN VIOLENCE PREVENTION
TASK FORCE
VICE CHAIR

June 3, 2016

Dear Mr. Wermer:

Thank you for contacting me to express your concerns regarding the Golden Gate National Recreation Area (GGNRA) draft Dog Management Plan. I respect your concerns, and think you make valid points about this plan. I would like to clarify my own beliefs about off-leash policies at GGNRA, and my hopes for an inclusive, thoughtful, environmentally friendly GGNRA for all of us to share.

I believe there should be opportunities for all residents to recreate in the GGNRA, whether one wants to bird watch or ride a horse, walk a path or climb a hill, watch a wave or watch their dog romp. Some of these uses are incompatible, and setting aside areas for non-compatible uses is appropriate.

Let me be clear, I don't think all of GGNRA should be open to off-leash dogs – only designated off-leash areas that don't impact our native wildlife. GGNRA isn't just for humans and dogs; we share it with a diverse ecosystem of creatures. If we want to open parts of the park to off-leash dogs, we will need to post clear guidelines and enforcement measures. It's then up to dog owners to follow those rules and protect the natural beauty of GGNRA for all who visit, with or without their furry friends. We need a Dog Management plan that includes all constituencies, and takes into account the recreational interests of all.

I am confident we can achieve this balance, and the National Parks Service should work on a plan to reflect that balance. Thank you again for taking the time to write to me about this issue. Don't hesitate to contact me in the future if I may be of assistance.

All the best,



Jackie Speier
Member of Congress

--
Paul Wermer Sustainability Consulting

(b) (6)(b) (6)(b) (6) 5

(b) (6)(h) (6)
(b) (6)

www.pw-sc.com

--
www.amywmeyer.com

GGNRA183620



From: Howard Levitt and Wendy Scheffers [howandwer@b\(6\)](#)
Subject: Re: FYI re Speier and dog management plan: Responding to your message
Date: June 09, 2016 at 10:37 PM America/Los_Angeles
To: Amy Meyer [amy7w2m@b\(6\)](#)

Amy, I agree that Jackie had painted herself into a corner as the champion of the underdog (pun intended) in the fight against the imperious NPS, and her letter to Paul reflects a different tone. However, as recently as March 16 she sent a letter to the head of the Approps Committee in Congress that reiterated her desire to block funding for GGNRA to implement a new dog plan. So my personal assessment is that she was simply responding softly to Paul because of his support for NPS, but probably hasn't moved much. H

On Jun 9, 2016, at 5:07 PM, Amy Meyer wrote:

Howard,
I thought you'd like to see this.
Let me know if what Lennie has written is in tune with GGNRA's current perceptions.
Amy

----- Forwarded message -----

From: Lennie Roberts <lennie@darwin.ptvy.ca.us>
Date: Thu, Jun 9, 2016 at 3:47 PM
Subject: Re: FYI re Speier and dog management plan: Responding to your message
To: Amy Meyer <[amy7w2m@b\(6\)](#)>
Cc: BeckyE <[rebecae@b\(6\)](#)>, wsheplaw <[WSHEPLAW@b\(6\)](#)>, Paul Wermer <[paul@b\(6\)](#)>

Wow!

I think Jackie has stepped WAY back from previous statements in the press that were very pro-dog.

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COMMITTEE ON ARMED SERVICES
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All the best,



Jackie Speier
Member of Congress

--

Paul Wermer Sustainability Consulting

(b) (6)(b) (6)(b) (6)

5

(b) (6)(b) (6)

GGNRA183622

paul@**(b) (6)**

www.pw-sc.com

--

www.amymeyer.com

From: Amy Meyer amy7w2m@(b) (6)
Subject: Fwd: Proposed Rule for Dog Management Open for Comment - Feb 24
Date: March 17, 2016 at 3:41 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Howard,

In response to a request from Rich Bartke to send letters to legislators and GGNRA, Paul Jones of the old CAC sent this reply.

If you can think of one brief statement I could make to him, let me know. The San Francisco situation is much better than in the two other counties.

Amy

----- Forwarded message -----

From: Paul Jones <pauljonessailor@(b) (6)>
Date: Thu, Mar 17, 2016 at 11:17 AM
Subject: Re: Proposed Rule for Dog Management Open for Comment - Feb 24
To: Rich Bartke <richbartke@(b) (6)>
Cc: amy7w2m@(b) (6), Lennie Roberts <lennie@darwin.ptvy.ca.us>, gbatmuirb@(b) (6), gimmyparkli@(b) (6), ccserve@(b) (6)

Hi, Folks: I am going to write my own letter and it's going to say that I'm not supportive of the approach they are taking for San Mateo. I'm going to have to respectfully (and I mean very respectfully) disagree. They are eliminating about 70% of the trails to unleash dog access. I don't see the science behind the decision, which means it's a policy desire. This will have the unwanted effect of creating conflicts where there will be access and funneling dog walkers onto City of Pacifica lands, which are already stressed. GGNRA owns over 50% of the land in Pacifica, so it's not a trivial matter in terms of members of the community affected by this potential rule. There are other scientists who agree with me, so I know I'm not alone. There is a former NPS manager who agrees with my view. MMWD allows dogs on leash on almost all of its lands and you can't say they're ecologically less valuable, plus their watersheds are feed the water supply for Marin. If they can do it, the GGNRA can be a bit more lenient.

As it stands now, a Pacifican can't walk a dog up onto Sweeney Ridge without DRIVING over to Sneath Lane to access the fire road up the hill. Then, you can walk to the Nike site and back. That isn't right. There is no reason that a person can't walk on the Baquiano Trail with a dog onleash up to the "discovery site". It won't harm a butterfly or a bee. It's arbitrary or a misapplication of "science".

I strongly believe, after working for EPA for 26 years, that decisions need to be anchored in policy, law, and science. I don't see it for San Mateo. Can't speak for decisions affecting San Francisco or Marin as I haven't paid much attention to it. But for down here, I'm quite certain there will be a significant backlash that could be avoided.

Sincerely,
Paul

On Wed, Mar 16, 2016 at 9:56 PM, <richbartke@(b) (6)> wrote:

I agree, Amy, that the dog issue ought to be addressed by us. But I think a joint letter will take too much time and energy.

I think each of us should write a letter, first explaining our membership on the Commission which held all the public hearings, and then offering our individual opinions.

Is that a workable plan? I'm ready to put pen to paper (so to speak).

Rich

GGNRA183624

-----Original Message-----

From: Amy Meyer <[\(b\) \(6\)](mailto:amy7w2m@(b) (6))>

To: richbartke <[\(b\) \(6\)](mailto:richbartke@(b) (6))>

Cc: Lennie Roberts <lennie@darwin.ptvy.ca.us>; Gordon Bennett <[\(b\) \(6\)](mailto:gbatmuirb@(b) (6))>; gimmyparkli <[\(b\) \(6\)](mailto:gimmyparkli@(b) (6))>

Sent: Wed, Mar 16, 2016 4:16 pm

Subject: Fwd: Proposed Rule for Dog Management Open for Comment - Feb 24

Dear Rich,

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As you may imagine, the dog owners are as contentious as ever, from Crissy Field Dog to Save Our Recreation. Their main argument seems to be this is not a national park but an urban recreation area. There was a fine editorial in the Chronicle in support of the Special Rule. There have been mixed letters in publications. Yesterday the SF Board of Supervisors voted 10 - 1 against the Special Rule (my supervisor, Eric Mar, excepted). Their advisory resolution is just part of the lower levels of government getting into the act and I don't expect anything else from San Mateo and Marin counties.

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First, please let the following members of Congress know that you support the GGNRA's proposed rule that provides recreation for all and protects our at-risk natural resources (for ease, you can include these staffers on one email rather than sending 4 individual ones):

Leader Nancy Pelosi: Robert.edmonson@mail.house.gov

Representative Jackie Speier: Miriam.Goldstein@mail.house.gov

Representative Jared Huffman: Jenny.callaway@mail.house.gov

Senator Dianne Feinstein: sean_elsbernd@feinstein.senate.gov

Second, and equally important, please take as little as 2 minutes to fill out [this form and submit formal comments](#) in support of GGNRA's proposed dog rule.

(This from Amy: I am going to send a longer letter to the park on this form because I think they will need as much substance as they can get. They particularly want personal examples of experiences with dogs, whether about safety, habitat destruction, visitor experience. etc) BUT PLEASE SEND COMMENTS!

Additional Resources:

[Frequently Asked Questions by the NPS](#)

[Frequently Asked Questions by the National Parks Conservation Association](#)

[Public Meetings on the Proposed Rule for Dog Management in the GGNRA](#)

[Dog Management Planning Timeline](#)

[Maps under the Proposed Rule for Dog Management in the GGNRA](#)

If any of you want the underlying policy and legislative support for this Special Rule, just ask and I will forward the information. But this letter is long enough.

Warm regards to all of you,

Amy

----- Forwarded message -----

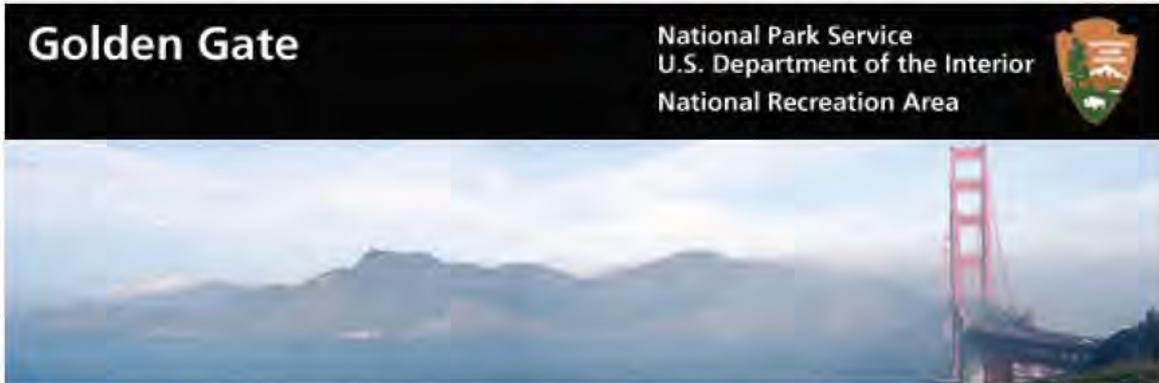
From: **GGNRA Superintendent Chris Lehnertz** <goga_planning@nps.gov>

Date: Tue, Feb 23, 2016 at 11:25 AM

Subject: Proposed Rule for Dog Management Open for Comment - Feb 24

To: amy7w2m@ (b) (6)

Having trouble viewing this email? [Click here](#)



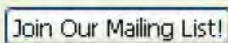
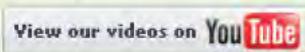
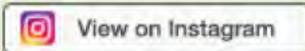
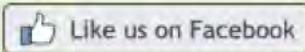
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Proposed Rule for Dog Management in the GGNRA

Open for Public Comment - February 24, 2016

Dear Friends of GGNRA:

I am pleased to announce the **Proposed Rule for Dog Management** in the Golden Gate National Recreation Area (GGNRA) will open for a 60-day public comment period on February 24, 2016. This is an important step in the process to develop a federal rule on dog management in the GGNRA.

The Proposed Rule would amend the park's special regulations designating 22 locations for dog walking in the GGNRA. It is based on the Preferred Alternative described in the Draft Dog Management Plan/Supplemental Environmental Impact Statement (SEIS) that was reviewed and commented on by the public in 2013/14. The Proposed Rule would designate where and how people would be able to enjoy the park with their dogs - both on- and off-leash - as well as places that would be dog free. It would define terms like "voice and sight control" that are essential to dog management. If ultimately implemented, the rule would ensure the protection of the park's natural and cultural resources and continue to provide recreational opportunities for a wide variety of park



recreational opportunities of a wide variety of park users. Comments on the Proposed Rule, along with comments previously received on the SEIS, will be used in developing the final plan and final rule, which are expected later this year.

GGNRA recognizes well-managed dog walking as a healthy and popular way to enjoy park lands. Under the Proposed Rule, the GGNRA would remain the most dog-friendly national park and the only national park in the United States to allow off-leash voice and sight control dog walking.

Under the Proposed Rule, off-leash dog walking would be allowed in seven areas in five different park locations including Fort Funston, the most popular dog walking area in the park. Dog walking would be allowed on almost one-third of the park's beach mileage, mostly off-leash, and one-third of the park's trail mileage would be available for visitors to walk their dogs on-leash. There would also be dog free beach and picnic area options. Specific areas would be identified for commercial dog walking.

Public Meetings

Please join us at a public meeting in Marin, San Francisco, or San Mateo County to discuss the Proposed Rule, ask questions, and learn about the public comment and planning process. [Click here for meeting details](#). If your organization would like us to speak at your next meeting about the Proposed Rule, please call us at [\(415\) 561-4728](tel:4155614728).

Where to find/comment on the Proposed Rule

To download a copy of the Proposed Rule on February 24, 2016, please visit www.regulations.gov (Search RIN: 1024-AE16). It is also available for public inspection on February 23, 2016, at www.federalregister.gov/public-inspection (search: Golden Gate Dog Management). If you have questions about the Proposed Rule or would like to request a hard copy, please call [\(415\) 561-4728](tel:4155614728) or goga_dogmgt@nps.gov. Please note that comments on the Proposed Rule will be accepted through April 25, 2016, at www.regulations.gov (Search RIN: 1024-AE16), or via letter to: Superintendent, GGNRA, Dog Management Proposed Rule, Building 201 Fort Mason, San Francisco, California, 94123.

Your comments on the Proposed Rule will play an important role in the development of the final plan and rule, which are expected later this year. We welcome your participation in the process. For more information on dog management planning and the Proposed Rule, please visit our [website](#).

Sincerely,

Christine Lehnertz
Superintendent

To request alternate formats of this email, or general accessibility information, please visit our [park accessibility website](#), email goga_accessibility@nps.gov or call [\(415\) 561-4958](tel:4155614958). Individuals who are deaf, hard-of-hearing, deaf/blind or have speech disabilities may utilize the Federal Relay Service number [\(800\) 877-8339](tel:8008778339).

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National Park Service
U.S. Department of the Interior

You are receiving this email because you have expressed an interest in receiving updates from Golden Gate National Recreation Area. Don't forget to add goga_planning@nps.gov to your address book so we'll be sure to land in your inbox!

If you'd like to unsubscribe please click the "SafeUnsubscribe" link at the bottom of this email.

Golden Gate National Recreation Area, Building 201 - Fort Mason, San
Francisco, CA 94123

[SafeUnsubscribe™ amy7w2m@gmail.com](mailto:SafeUnsubscribe%20amy7w2m@gmail.com)

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www.amywmeyer.com

From: Amy Meyer amy7w2m@(b) (6)
Subject: Fwd: Proposed Rule for Dog Management Open for Comment - Feb 24
Date: March 18, 2016 at 2:25 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Howard

There seems to be no way in this stupid (b) (6) to send one message, the one right below from Paul Jones, without sending the whole train of e-mails. Or— maybe Yani can give me another computer lesson.

This morning you outlined what might be possible in Pacifica: a combination of a small beach of theirs and 1/3 of an acre at Mori Point. I had heard the same from Frank Dean. Is this the time to tell Paul to start looking into this? If so, would you give me a few sentences for him, please. I could begin with "I've heard there is a small Pacifica beach that could be combined with a tiny piece of Mori Point beach that might accomplish some of the access that you want. [Description] Can you look into this?"

Or, another idea?

You and Chris were just fine this morning.

Amy

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Date: Thu, Mar 17, 2016 at 11:17 AM
Subject: Re: Proposed Rule for Dog Management Open for Comment - Feb 24
To: Rich Bartke <richbartke@(b) (6)>
Cc: amy7w2m@(b) (6), Lennie Roberts <lennie@darwin.ptvy.ca.us>, gbatmuirb@(b) (6), gimmyparkli@(b) (6), ccserve@(b) (6)

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-----Original Message-----

From: Amy Meyer <[\(b\) \(6\)](mailto:amy7w2m@(b) (6))>
To: richbartke <[\(b\) \(6\)](mailto:richbartke@(b) (6))>
Cc: Lennie Roberts <lennie@darwin.ptvy.ca.us>; Gordon Bennett <[\(b\) \(6\)](mailto:gbatmuirb@(b) (6))>; gimmyparkli <[\(b\) \(6\)](mailto:gimmyparkli@(b) (6))>
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Representative Jackie Speier: Miriam.Goldstein@mail.house.gov
Representative Jared Huffman: Jenny.callaway@mail.house.gov
Senator Dianne Feinstein: sean_elsbernd@feinstein.senate.gov

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Additional Resources:

[Frequently Asked Questions by the NPS](#)

[Frequently Asked Questions by the National Parks Conservation Association](#)

[Public Meetings on the Proposed Rule for Dog Management in the GGNRA](#)

[Dog Management Planning Timeline](#)

[Maps under the Proposed Rule for Dog Management in the GGNRA](#)

If any of you want the underlying policy and legislative support for this Special Rule, just ask and I will forward the information. But this letter is long enough.

Warm regards to all of you,

Amy

----- Forwarded message -----

From: **GGNRA Superintendent Chris Lehnertz** <goga_planning@nps.gov>

Date: Tue, Feb 23, 2016 at 11:25 AM

Subject: Proposed Rule for Dog Management Open for Comment - Feb 24

To: amy7w2m@ (b) (6)

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Golden Gate

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



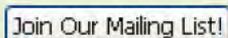
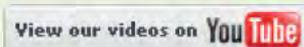
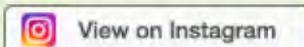
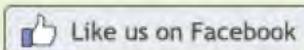
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Proposed Rule for Dog Management in the GGNRA

Open for Public Comment - February 24, 2016

Dear Friends of GGNRA:

I am pleased to announce the **Proposed Rule for Dog Management** in the Golden Gate National Recreation Area (GGNRA) will open for a 60-day public comment period on February 24, 2016. This is an important step in the process to develop a federal rule on dog management in the GGNRA.



The Proposed Rule would amend the park's special regulations designating 22 locations for dog walking in the GGNRA. It is based on the Preferred Alternative described in the Draft Dog Management

Plan/Supplemental Environmental Impact Statement (SEIS) that was reviewed and commented on by the public in 2013/14. The Proposed Rule would designate where and how people would be able to enjoy the park with their dogs - both on- and off-leash - as well as places that would be dog free. It would define terms like "voice and sight control" that are essential to dog management. If ultimately implemented, the rule would ensure the protection of the park's natural and cultural resources and continue to provide recreational opportunities for a wide variety of park users. Comments on the Proposed Rule, along with comments previously received on the SEIS, will be used in developing the final plan and final rule, which are expected later this year.

GGNRA recognizes well-managed dog walking as a healthy and popular way to enjoy park lands. Under the Proposed Rule, the GGNRA would remain the most dog-friendly national park and the only national park in the United States to allow off-leash voice and sight control dog walking.

Under the Proposed Rule, off-leash dog walking would be allowed in seven areas in five different park locations including Fort Funston, the most popular dog walking area in the park. Dog walking would be allowed on almost one-third of the park's beach mileage, mostly off-leash, and one-third of the park's trail mileage would be available for visitors to walk their dogs on-leash. There would also be dog free beach and picnic area options. Specific areas would be identified for commercial dog walking.

Public Meetings

Please join us at a public meeting in Marin, San Francisco, or San Mateo County to discuss the Proposed Rule, ask questions, and learn about the public comment and planning process. [Click here for meeting details](#). If your organization would like us to speak at your next meeting about the Proposed Rule, please call us at [\(415\) 561-4728](tel:4155614728).

Where to find/comment on the Proposed Rule

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(Search RIN: 1024-AE16), or via letter to:
Superintendent, GGNRA, Dog Management
Proposed Rule, Building 201 Fort Mason, San
Francisco, California, 94123.

Your comments on the Proposed Rule will play an important role in the development of the final plan and rule, which are expected later this year. We welcome your participation in the process. For more information on dog management planning and the Proposed Rule, please visit our [website](#).

Sincerely,

Christine Lehnertz
Superintendent

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From: [Amy Meyer](#)
To: [Howard Levitt and Wendy Scheffers](#)
Subject: Fwd: Proposed Rule for Dog Management Open for Comment - Feb 24
Date: Thursday, March 17, 2016 3:41:55 PM

Howard,

In response to a request from Rich Bartke to send letters to legislators and GGNRA, Paul Jones of the old CAC sent this reply.

If you can think of one brief statement I could make to him, let me know. The San Francisco situation is much better than in the two other counties.

Amy

----- Forwarded message -----

From: Paul Jones <[\(b\) \(6\)](mailto:pauljonessailor@(b) (6))>
Date: Thu, Mar 17, 2016 at 11:17 AM
Subject: Re: Proposed Rule for Dog Management Open for Comment - Feb 24
To: Rich Bartke <[\(b\) \(6\)](mailto:richbartke@(b) (6))>
Cc: [\(b\) \(6\)](mailto:amy7w2m@(b) (6)), Lennie Roberts <lennie@darwin.ptvy.ca.us>, [\(b\) \(6\)](mailto:gbatmuirb@(b) (6)), [\(b\) \(6\)](mailto:gimmyparkli@(b) (6)), [\(b\) \(6\)](mailto:ccserve@(b) (6))

Hi, Folks: I am going to write my own letter and it's going to say that I'm not supportive of the approach they are taking for San Mateo. I'm going to have to respectfully (and I mean very respectfully) disagree. They are eliminating about 70% of the trails to onleash dog access. I don't see the science behind the decision, which means it's a policy desire. This will have the unwanted effect of creating conflicts where there will be access and funneling dog walkers onto City of Pacifica lands, which are already stressed. GGNRA owns over 50% of the land in Pacifica, so it's not a trivial matter in terms of members of the community affected by this potential rule. There are other scientists who agree with me, so I know I'm not alone. There is a former NPS manager who agrees with my view. MMWD allows dogs on leash on almost all of its lands and you can't say they're ecologically less valuable, plus their watersheds are feed the water supply for Marin. If they can do it, the GGNRA can be a bit more lenient.

As it stands now, a Pacifican can't walk a dog up onto Sweeney Ridge without DRIVING over to Sneath Lane to access the fire road up the hill. Then, you can walk to the Nike site and back. That isn't right. There is no reason that a person can't walk on the Baquiano Trail with a dog onleash up to the "discovery site". It won't harm a butterfly or a bee. It's arbitrary or a misapplication of "science".

I strongly believe, after working for EPA for 26 years, that decisions need to be anchored in policy, law, and science. I don't see it for San Mateo. Can't speak for decisions affecting San Francisco or Marin as I haven't paid much attention to it. But for down here, I'm quite certain there will be a significant backlash that could be avoided.

Sincerely,
Paul

On Wed, Mar 16, 2016 at 9:56 PM, <[\(b\) \(6\)](mailto:richbartke@(b) (6))> wrote:

| I agree, Amy, that the dog issue ought to be addressed by us. But I think a joint letter will take too much

time and energy.

I think each of us should write a letter, first explaining our membership on the Commission which held all the public hearings, and then offering our individual opinions.

Is that a workable plan? I'm ready to put pen to paper (so to speak). Rich

-----Original Message-----

From: Amy Meyer <[\(b\) \(6\)](mailto:amy7w2m@b(6))>

To: richbartke <[\(b\) \(6\)](mailto:richbartke@b(6))>

Cc: Lennie Roberts <lennie@darwin.ptvy.ca.us>; Gordon Bennett <[\(b\) \(6\)](mailto:gbatmuir@b(6))>; gimmyparkli <[\(b\) \(6\)](mailto:gimmyparkli@b(6))>

Sent: Wed, Mar 16, 2016 4:16 pm

Subject: Fwd: Proposed Rule for Dog Management Open for Comment - Feb 24

Dear Rich,

I feel the Advisory Commission in Exile has one more stand to take, since Dog Management in the GGNRA was going on while we were still in office. Five of us are on this letter, but perhaps one or another of you can suggest people I've lost contact with. Jackie Young and Paul Jones come to mind. Dennis Rodoni is running for office in Marin to replace Supervisor Steve Kinsey who is retiring. I would not bring him into this; if elected he would make a big difference on that board— but part of his district is in east Marin where there is controversy he doesn't need.

Below is the notice that came out a few weeks ago from Superintendent Chris Lehnertz. She is doing a wonderful personable job— this morning one Conservancy person at a small Crissy Field planning session said, "She is a model for all of us." At Congresswoman Pelosi's request, the comment period on this notice has since been extended a month, until May 25.

As you may imagine, the dog owners are as contentious as ever, from Crissy Field Dog to Save Our Recreation. Their main argument seems to be this is not a national park but an urban recreation area. There was a fine editorial in the Chronicle in support of the Special Rule. There have been mixed letters in publications. Yesterday the SF Board of Supervisors voted 10 - 1 against the Special Rule (my supervisor, Eric Mar, excepted). Their advisory resolution is just part of the lower levels of government getting into the act and I don't expect anything else from San Mateo and Marin counties.

I would like to have two letters from the CAC go into this fray. The first is very short and should be sent as soon as possible. Neal Desai of NPCA sent the following instructions. NOTE: the 3 congressional offices have dots between the first and last name of the recipient. Senator Feinstein's aide has an underline. These offices are counting the comments they receive.

First, please let the following members of Congress know that you support the GGNRA's proposed rule that provides recreation for all and protects our at-risk natural resources (for ease, you can include these staffers on one email rather than sending 4 individual ones):

Leader Nancy Pelosi: Robert.edmonson@mail.house.gov

Representative Jackie Speier: Miriam.Goldstein@mail.house.gov

Representative Jared Huffman: Jenny.callaway@mail.house.gov

Senator Dianne Feinstein: sean_elsbernd@feinstein.senate.gov

Second, and equally important, please take as little as 2 minutes to fill out [this form and submit formal comments](#) in support of GGNRA's proposed dog rule.

(This from Amy: I am going to send a longer letter to the park on this form because I think they will need as much substance as they can get. They particularly want personal examples of experiences with dogs, whether about safety, habitat destruction, visitor experience. etc) BUT PLEASE SEND COMMENTS!

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Date: Tue, Feb 23, 2016 at 11:25 AM

Subject: Proposed Rule for Dog Management Open for Comment - Feb 24

To: amy7w2m@(b) (6)

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Christine Lehnertz
Superintendent

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From: [Howard Levitt and Wendy Scheffers](#)
To: [Neal Desai](#)
Subject: Fwd: talking points
Date: Tuesday, March 01, 2016 4:51:50 PM
Attachments: [Talking Point re SF dog access.docx](#)

----- Forwarded message -----

From: **Howard Levitt and Wendy Scheffers** <[howandwen@](#)(b) (6) >
Date: Tue, Mar 1, 2016 at 2:34 PM
Subject: talking points
To: Wendy Scheffers <[wsmobility@](#)(b) (6) >

From: [Howard Levitt and Wendy Scheffers](#)
To: [frank and diane dean](#)
Subject: Fwd: today"s column
Date: Monday, January 20, 2014 3:54:45 PM

Frank, - my Stanford prof, cycling, and football buddy - just fired this off to Tom Stienstra. Written in classic academic English, Tom nevertheless calls Stienstra to task. Not sure what, if any the response will be. HL

Begin forwarded message:

From: Thomas A Ryckman <[<tryckman@\(b\) \(6\)>](mailto:tryckman@(b) (6))>
Date: January 20, 2014 3:00:43 PM PST
To: tstienstra@schronicle.com
Subject: today's column

Dear Mr. Stienstra,

I read your column regularly and usually with enjoyment. Since coming to SF in 1999, my wife and I have learned much from you about the wonderful walks in and around the Bay Area, and from your coverage of the wonders of (by Eastern standards) subtle seasonal changes in California.

However today I was both disappointed and annoyed. As I understand it, the GGNRA dog leash plan has been carefully drafted to balance the interests of dog owners with a mandate that fragile natural habitats must be protected. It is not the arbitrary imposition of government whim or a ukase from a remote faceless bureaucrat. In this matter, which I have followed for some time, dog owner groups are acting like spoiled children, selfishly putting their supposed entitlement (though allegedly speaking for their pets) above the general good of the public, a good that includes passing on to future generations the few remaining strips of wildlife habitat in the Bay Area. As with other areas of environmental protection, past practice or precedent is not, and should not be, an inviolable standard going forward. I do not see, as many dog owners do, that one can legitimately speak here of an infringement of "rights". In this narcissistic society, claims about "rights" are as common as blackberries and just about as meaningful.

Your remarks about government and park rangers may elicit praise from dog owners but they are irresponsible. You might ask the people of Charleston, WV about the necessity of "a lot of new rules and enforcement". And your opinion that "It is common these days that rangers do not live within the community of the parks they patrol" requires evidence. Even if true, the same could be said for many of the police and firemen working in communities in the Bay Area. You do a disservice to your readers to pander to a particular constituency on this issue.

Sincerely,

Thomas Ryckman

From: Neal Desai ndesai@npca.org

Subject: FYI

Date: April 22, 2016 at 9:31 AM America/Los_Angeles

To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Attachments:

[Final Neal Desai MIJ GGNRA Dog Rule OpEd.docx](#) (24.94 kB)

From: Amy Meyer a7w2m(b) (6)
Subject: GGNRA Dog Management History
Date: July 14, 2015 at 1:45 PM America/Los_Angeles
To: Neal Desai ndesai@npca.org, Becky Evans rebecca@ (b) (6)
Cc: Howard Levitt and Wendy Scheffers howandwen@ (b) (6)



Neal and Becky,

Howard confirmed 8 locations. I inserted Neal's corrections.

Now I am waiting for Howard to phone me back again: #5 includes San Mateo County. No off-leash accommodation to that county is shown— and that is where Speier is causing trouble. Please read that paragraph carefully to see whether there is a missing clause or sentence, such as "Some (or number of) on-leash sites have been identified."

Please look this over one more time and then I will prepare our 4 page packet.

This paper now has a title.

GGNRA Dog Management History

1. Of the 407 areas of the National Park System, not one permits off-leash dogs, and it is a significant stretch for NPS to even consider off-leash dog use.
2. When Golden Gate National Recreation Area took over the ownership of most of the beach areas of San Francisco and southern Marin, the park's administration acknowledged the long tradition of off-leash dog recreation in those areas of the park. This led to a 1979 recommendation by the Federal Advisory Commission for the GGNRA that dogs be allowed off-leash in different areas of the park, though the recommendation was not informed by scientific research or consideration of other park users. GGNRA made that recommendation park policy.
3. By the mid-1990s, the damage caused by off-leash dogs to dunes, habitat, and wildlife had become evident. When the Federal Advisory Commission tried to rescind the 1979 policy, dog owners went to court. The judge ruled there would have to be a formal public removal of the policy, instead of reverting to the national regulations. GGNRA petitioned the NPS regional and national directorate to allow development of a Special Rule for dog management, for this park only. This regulation would meet the preservation and recreation mandates of

the park's legislation. This process, with extensive public input and several revisions, has been going on for 15 years. The damage to the park's resources has continued to increase, and dog owners feel ever more entitled to run their dogs off-leash.

4. GGNRA is required to consider the expectations of a broad array of national park users from all over the country and the world, not solely the interests of single-issue stakeholders. Of the 22 park sites originally evaluated for off-leash use, the 5 that are most contested are those which are popular with all users and include habitat for sensitive species: Fort Funston, Ocean Beach, Crissy Field, Rodeo Beach, and Muir Beach. Under the proposed Special Rule, all but Muir Beach will have off-leash areas. The 8 off-leash areas will be at Crissy Field, Fort Funston, and Fort Mason's Great Meadow— each will have 2 areas— and Ocean Beach and Rodeo Beach will each have 1 area— for a total of 8.

5. NPS carefully assessed every area governed by the 1979 Pet Policy. They later reviewed key San Mateo County sites that were not owned or managed by the park in 1979, to determine if there were any areas where dogs could be permitted off leash without threatening wildlife and habitat, and which also permitted opportunities for those who want a dog-free experience. **Some (or number of) on-leash sites have been identified.** GGNRA identified 8 areas where they feel off-leash dog can be provided. In many instances, the original land manager prior to GGNRA did not allow off-leash dog walking, though the use was continuing illegally. When NPS or other federal land management agencies review park uses, they do not grandfather in uses that are conducted against regulations.

6. In addition to the 8 proposed off leash areas, there are 21 areas (including some that also permit off leash) that are proposed for on-leash dog walking.

7. Commercial dog walkers are limited to certain areas and are subject to a 3 dog maximum except on Fort Funston, Fort Mason, Baker Beach, and Crissy Field in San Francisco and Fort Baker, Rodeo Beach, and Alta Trail in Marin where they are subject to a 6 dog limit. The 6 dog limit is the same as that for the Presidio and the city parks in San

Francisco. The dogs may be off-leash where otherwise permitted. NPS authority to permit this use is contested by several environmental groups.

From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: Re: GGNRA Dog Management History
Date: July 14, 2015 at 1:58 PM America/Los_Angeles
To: Amy Meyer a7w2m@(b) (6)
Cc: Neal Desai ndesai@npca.org, Becky Evans rebecca@(b) (6)



Amy, et al: Final minor suggestions in ALL CAPS below. A few words also deleted for clarity.
Howard

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Subject: Re: GGNRA Dog Management History
Date: July 14, 2015 at 2:07 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Cc: Neal Desai ndesai@npca.org, Becky Evans rebecca@**(b) (6)**



Howard,

Thanks for what's in caps— will add.

Please comment on what I wrote in red. A little more has to be said about San Mateo County. Does that clause cover it?

Amy

On Jul 14, 2015, at 1:58 PM, Howard Levitt and Wendy Scheffers <[howandwen@**\(b\) \(6\)**](mailto:howandwen@(b) (6)</b)> wrote:

Amy, et al: Final minor suggestions in ALL CAPS below. A few words also deleted for clarity. Howard

On Tue, Jul 14, 2015 at 1:45 PM, Amy Meyer <[a7w2m@**\(b\) \(6\)**](mailto:a7w2m@(b) (6)</b)> wrote:
Neal and Becky,

Howard confirmed 8 locations. I inserted Neal's corrections.

Now I am waiting for Howard to phone me back again: #5 includes San Mateo County. No off-leash accommodation to that county is shown— and that is where Speier is causing trouble. Please read that paragraph carefully to see whether there is a missing clause or sentence, such as "Some (or number of) on-leash sites have been identified."

Please look this over one more time and then I will prepare our 4 page packet.

This paper now has a title.

GGNRA Dog Management History

1. Of the 407 areas of the National Park System, not one permits off-leash dogs, and it is a significant stretch for NPS to even consider off-leash dog use.
2. When Golden Gate National Recreation Area took over the ownership of most of the beach areas of San Francisco and southern Marin, the park's administration acknowledged the long tradition of off-leash dog recreation in those areas of the park. This led to a 1979 recommendation by the Federal Advisory Commission for the GGNRA that dogs be allowed

off-leash in different areas of the park, though the recommendation was not informed by scientific research or consideration of other park users. GGNRA made that recommendation park policy.

3. By the mid-1990s, the damage caused by off-leash dogs to dunes, habitat, and wildlife had become evident. When the Federal Advisory Commission tried to rescind the 1979 policy, THE PARK MOVED TO IMPLEMENT THE NATIONAL RULE ON DOG WALKING AND dog owners went to court. The judge ruled there would have to be a formal public removal of the policy, instead of reverting to the national regulations. GGNRA petitioned the NPS regional and national directorate to allow development of a Special Rule for dog management, for this park only. This regulation would meet the preservation and recreation mandates of the park's legislation. This process, with extensive public input and several revisions, has been going on for 14 years. The damage to the park's resources has continued to increase, and dog owners feel ever more entitled to run their dogs off-leash.

4. GGNRA is required to consider the expectations of a broad array of national park users from all over the country and the world, not solely the interests of single-issue stakeholders. Of the 22 park sites originally evaluated for off-leash use, the 5 that are most contested are those which are popular with all users and include habitat for sensitive species: Fort Funston, Ocean Beach, Crissy Field, Rodeo Beach, and Muir Beach. Under the proposed Special Rule, all but Muir Beach will have off-leash areas. The 8 off-leash areas will be at Crissy Field, Fort Funston, and Fort Mason's Great Meadow— each will have 2 areas— and Ocean Beach and Rodeo Beach will each have 1 area— for a total of 8.

5. NPS carefully assessed every area governed by the 1979 Pet Policy. They later reviewed key San Mateo County sites that were not owned or managed by the park in 1979, to determine if there were any areas where dogs could be

permitted off leash without threatening wildlife and habitat, and which also permitted opportunities for those who want a dog-free experience. **Some (or number of) on-leash sites have been identified.** GGNRA identified 8 areas where they feel off-leash dog can be provided. In many instances, the original land manager prior to GGNRA did not allow off-leash dog walking, though the use was continuing illegally. When NPS or other federal land management agencies review park uses, they do not grandfather in uses that are conducted against regulations.

6. In addition to the 8 proposed off leash areas, there are 21 areas (including some that also permit off leash) that are proposed for on-leash dog walking.

7. Commercial dog walkers are limited to certain areas and are subject to a 3 dog maximum except on Fort Funston, Fort Mason, Baker Beach, and Crissy Field in San Francisco and Fort Baker, Rodeo Beach, and Alta Trail in Marin where they are subject to a 6 dog limit. The 6 dog limit is the same as that for the Presidio and the city parks in San Francisco. The dogs may be off-leash where permitted. NPS authority to permit this use is contested by several environmental groups.

Amy Meyer
www.amymeyer.com

From: BeckyE rebecca@ (b) (6)
Subject: Re: GGNRA Dog Management History
Date: July 14, 2015 at 2:57 PM America/Los_Angeles
To: Amy Meyer a7w2m@ (b) (6) (b) (6) Neal Desai ndesai@npca.org
Cc: Howard Levitt and Wendy Scheffers howandwen@ (b) (6)



From: David Shaw DShaw@parksconservancy.org
Subject: Hi Howard
Date: February 19, 2016 at 10:30 AM America/Los_Angeles
To: "howandwen@gmail.com" howandwen@(b) (6)



Hi Howard:

Pete made some suggested revisions to the letter from Chris about the draft rule release. See attached. Understand if it is not possible to incorporate revisions but wanted to pass along in case.

Hope this helps!

Cheers,
David

Attachments:

[DRAFT.Supt.Dog.Mgt.2.8.16HL.EH_MH_PB.docx](#) (36.3 kB)

From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: Re: Hi Howard
Date: February 19, 2016 at 12:42 PM America/Los_Angeles
To: David Shaw DShaw@parksconservancy.org



Thanks, David. Good thoughts here, but we had already been moving forward, and it's too late to change directions. I think the letter we've come up with conveys the right tone and content. Will forward it to you shortly. Howard

On Fri, Feb 19, 2016 at 10:30 AM, David Shaw <DShaw@parksconservancy.org> wrote:

Hi Howard:

Pete made some suggested revisions to the letter from Chris about the draft rule release. See attached. Understand if it is not possible to incorporate revisions but wanted to pass along in case.

Hope this helps!

Cheers,
David

From: Amy Meyer amy7w2m@**(b) (6)**
Subject: Huffman
Date: April 12, 2016 at 3:04 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**



I spoke with Jenny in his office this morning. She will try to get him to help with the fire pits. At her request, I sent her the letter I sent to the Commission.

--

www.amywmeyer.com

From: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Subject: Re: Huffman
Date: April 12, 2016 at 3:30 PM America/Los_Angeles
To: Amy Meyer amy7w2m@**(b) (6)**



Amy, your letter was terrific. I will be testifying before the Commission on Friday and hopefully they will provide us an unclouded consistency determination. Howard

On Tue, Apr 12, 2016 at 3:04 PM, Amy Meyer <[amy7w2m@**\(b\) \(6\)**](mailto:amy7w2m@(b) (6))> wrote:

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--

www.amywmeyer.com

From: Amy Meyer amy7w2m@(b) (6)
Subject: Re: Huffman
Date: April 12, 2016 at 4:58 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Are you going to be at P4P/P on Friday morning, Howard?

Here is the **Agenda**. I understand Brian Aviles will be there for the first item. I know Chris can't come so I'm concerned about #2 and #3. What time do you have to be in Santa Rosa?

Amy

- 1) **Crissy Refresh and East Beach parking lot renovation** - Jen Greene, Natalya Blumenfeld - Parks Conservancy - 30 minutes
- 2) **Update on Special Rule for Dog Management** - Howard Levitt - 15 minutes
- 3) **Introduction to the US Park Police** - Lieutenant Timothy Hodge - Relates specially to the Special Rule for Dog Management - 20 minutes
- 4) **SF Maritime National Historical Park - A fantastic acquisition!** - Kevin Hendricks or Lynn Cullivan - 10 minutes

San Francisco Maritime National Historical Park recently acquired the Allen Knight collection from the Museum of Monterey (formerly the Monterey History & Maritime Museum). The collection primarily relates to Pacific and West Coast maritime and includes roughly: 18,500 photographs, prints and negatives; 50 linear feet of archival material (the bulk of which are logbooks); over 200 artifacts related to West Coast ships and maritime industry including: 22 ship models, approximately 100 paintings, prints and drawings, 20 nameboards, 10 life rings, 25 scrimshaw and bone carvings, and a variety of ship furnishings and fittings.
- 5) **How does the Trust keep tenants informed about changes that take place on the Presidio?** Kathryn Inglin, Presidio Trust - 10 minutes
- 6) **People for the Parks/Presidio and social media** - Becky Evans will introduce - We'll continue this at the next meeting - 5 minutes

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www.amymeyer.com

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www.amymeyer.com

From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: Re: Huffman
Date: April 12, 2016 at 5:22 PM America/Los_Angeles
To: Amy Meyer amy7w2m@(b) (6)



I'm planning on staying through the USPP item. Howard

On Tue, Apr 12, 2016 at 4:58 PM, Amy Meyer <amy7w2m@(b) (6)> wrote:
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www.amywmeyer.com

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www.amywmeyer.com

From: Amy Meyer amy7w2m@(b) (6)
Subject: Re: Huffman
Date: April 12, 2016 at 5:26 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Good! Thanks.

On Tuesday, April 12, 2016, Howard Levitt and Wendy Scheffers <howandwen@(b) (6)> wrote:

I'm planning on staying through the USPP item. Howard

On Tue, Apr 12, 2016 at 4:58 PM, Amy Meyer <amy7w2m@(b) (6)> wrote:
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www.amywmeyer.com

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www.amywmeyer.com

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www.amywmeyer.com

From: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Subject: Interesting M and R piece from around a month ago
Date: March 01, 2016 at 7:49 PM America/Los_Angeles
To: Neal Desai ndesai@npca.org, Amy Meyer amy7w2m@**(b) (6)**^{(b) (6)}, BeckyE Evans
rebecae@**(b) (6)**



Katy Tang is the sponsor of the BOS resolution opposing the dog rule. HL

Attachments:

[M and R.docx](#) (96.63 kB)

From: BeckyE rebecca@e(b) (6)
Subject: Re: Interesting M and R piece from around a month ago
Date: March 01, 2016 at 7:57 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)(b) (6) Neal Desai ndesai@npca.org, Amy Meyer amy7w2m@(b) (6)



Very interesting. She was staff for one of the supervisors before she was appointed to fill that seat. -----Original Message----- >From: Howard Levitt and Wendy Scheffers >Sent: Mar 1, 2016 7:49 PM >To: Neal Desai , Amy Meyer , BeckyE Evans >Subject: Interesting M and R piece from around a month ago > >Katy Tang is the sponsor of the BOS resolution opposing the dog rule. HL >

From:

N

Neal Desai ndesai@npca.org

Subject:

Re: Interesting M and R piece from around a month ago

Date:

March 01, 2016 at 10:02 PM America/Los_Angeles

To:

Howard Levitt and Wendy Scheffers [\(b\) \(6\)](mailto:howandwen@(b) (6))

Good to know > On Mar 1, 2016, at 7:50 PM, "Howard Levitt and Wendy Scheffers" wrote: > > Katy Tang is the sponsor of the BOS resolution opposing the dog rule. HL > >

From: Amy Meyer a7w2m@(b) (6)
Subject: Last piece of dog management presentation to Dan Bernal
Date: July 10, 2015 at 4:42 PM America/Los_Angeles
To: chris_lehnertz@(b) (6)
Cc: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Dear Chris, Neal, Becky, and I have pulled together all but the last piece of paper for the meeting with Dan on Wednesday. They are 1) a shortened version of the preamble Howard sent us and 2) the chart he sent showing what neighboring agencies do. I found 3) the CFR citation and will provide Dan with a copy, highlighting sections 1 and 2.. Howard said he'd get on the paper that summarizes the relevant sections of the Dog Management Plan as soon as he returns on Monday. This has to be in bullet or other short form— it's my experience that Dan does not have the time to deal with anything of any length. He will simply want to know the essentials. I need the paper by Tuesday morning because I want to send the 4 papers to Dan ahead of time and want him to be able to share them with the person he is including in our meeting from their Washington office. I also have to go over the paper with Neal and Becky before I use it. I have to leave by 9:30 Monday morning for an event for the opening of the New Presidio Parkway. I will be back about noon. I leave for a doctors appointment at 2:15. Back near 4. Best, Amy

From: Howard Levitt and Wendy Scheffers [howandwen@\(b\) \(6\)](mailto:howandwen@(b) (6))
Subject: Re: Last piece of dog management presentation to Dan Bernal
Date: July 13, 2015 at 4:53 PM America/Los_Angeles
To: Amy Meyer [\(b\) \(6\)](mailto:a7w2m@(b) (6)); Neal Desai ndesai@npca.org,
rebae@[\(b\) \(6\)](mailto:(b) (6))
Cc: [\(b\) \(6\)](mailto:chris_lehnertz@(b) (6))



Amy, Neal, and Becky:

Try this ...

1. Golden Gate petitioned the NPS regional and national directorate to be able to develop a GOGA-specific rule for dog management that both met the preservation and recreation mandates of an NPS site, and also acknowledged the then-30 year tradition of off-leash dog use in areas of the park, and park ownership of most of the beach areas in San Francisco and southern Marin. It is a significant stretch for NPS to even consider off-leash dog use.
2. Of 407 areas of the NPS, not one permits off leash dog use.
2. Unlike single-issue stakeholders, NPS is required to consider the desires of a broad array of park users.
3. The sites that are most contested in the park are those which are popular with all users - Fort Funston, Ocean Beach, Crissy Field, Rodeo Beach, and Muir Beach. Four of these areas have proposed off-leash areas. Others of the 22 areas originally evaluated for use zoning are also used and enjoyed by a broad spectrum of visitors.
4. NPS carefully assessed every area governed by the 1979 Pet Policy, and later added key San Mateo County sites that were not owned or managed by the park in 1979, to determine if there were any areas where dogs could be permitted off leash without threatening sensitive or threatened wildlife and plants, and which also permitted opportunities for those who want a dog-free experience. We identified 7 areas where we feel off leash dog use can occur.
5. In addition to the 7 proposed off leash areas, there are 21 areas (including some that also permit off leash) that propose on-leash dog walking.
6. Commercial dog walking is permitted in many park areas; NPS authority to permit this use is contested by several groups.

Howard

On Fri, Jul 10, 2015 at 4:42 PM, Amy Meyer <[\(b\) \(6\)](mailto:a7w2m@(b) (6))> wrote:
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From: Amy Meyer a7w2m@(b) (6)
Subject: Re: Last piece of dog management presentation to Dan Bernal
Date: July 13, 2015 at 4:59 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Cc: Neal Desai ndesai@npca.org, Becky Evans rebecca@npca.org, chris_lehnertz@(b) (6)



Thanks, Howard.

I know it was a strain to get this out on your first day back.

Will keep you and Chris posted when we have our packet together to send to Dan tomorrow.

Best,
Amy

On Jul 13, 2015, at 4:53 PM, Howard Levitt and Wendy Scheffers <howandwen@npca.org> wrote:

Amy, Neal, and Becky:

Try this ...

1. Golden Gate petitioned the NPS regional and national directorate to be able to develop a GOGA-specific rule for dog management that both met the preservation and recreation mandates of an NPS site, and also acknowledged the then-30 year tradition of off-leash dog use in areas of the park, and park ownership of most of the beach areas in San Francisco and southern Marin. It is a significant stretch for NPS to even consider off-leash dog use.
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www.amymeyer.com

Bay Area Dog Management Zones: Extent of On-leash, Off-leash, and Prohibited Areas

Jurisdiction	City/County of San Francisco	San Mateo County	Marin County Parks	Marin County Open Space	Marin Water District	Point Reyes National Seashore	State of CA	Mid-peninsula Regional Open Space	East Bay Regional Parks	San Francisco Watershed
Area of Managed Land	3,300 acres	16,000 acres; 50 miles of trail	700 acres	15,000 acres; 190 miles of trail and fire road	21,000 acres; 130 miles of trail	71,000 acres	12,000 acres near, adjacent to GGNRA	50,000 acres; 220 miles of trail	95,000 acres; 1,150 miles of trail	63,000 acres; 210 miles of rights-of-way
Areas where dogs permitted On-Leash	3,300 acres minus athletic fields/courts; playgrounds; sensitive habitat areas	None	Approx. 300 acres in McInnis opened to on-leash.	190 miles of trails and fire roads	21,000 acres; 130 miles of trail	150 acres of beach (approx.); most 'developed' areas; 15.4 miles of trail	Parking lots and paved roads only; no beaches or trails	17.5 acres; 50 miles of trail	Approx. 90,000 acres	None
Areas where dogs permitted Off-Leash	114 acres*; .2 miles of trail (recently reduced by 14 acres for natural resource protections)	None	None	70 miles of fire roads	None	None	None	17.5 acres	Most areas, excepting parking lots, picnic areas, camping, etc.	None
Areas where dogs prohibited	Athletic fields/courts; playgrounds; sensitive habitat areas	16,000 acres; 50 miles of trail	400 acres	Approx. 14,800 acres (all areas except trails and fire roads)	None	All undeveloped areas; most beaches and trails	All areas except parking lots and paved roads	Approx. 48,930 acres	Approx. 5000 acres of beaches, wetlands, nature areas/ preserves and golf courses	63,000 acres; 210 miles of rights-of-way

From: Amy Meyer a7w2m@**(b) (6)**
Subject: P4P/P
Date: July 02, 2015 at 1:49 PM America/Los_Angeles
To: howard Wendy Scheffers howandwen@**(b) (6)**



Howard,

Realized when your automatic reply came back this morning that you would not see it for a long while.

Amy

Dear All,

I would like to schedule our next meeting during the week of July 20 or July 27, 8:30 -10 am, at Fort Mason Center. The earlier week would be better. Some of you are essential for this meeting; others are less so or can suggest someone else to attend.

Topics will include:

Changes at the Presidio Trust — Updates on management (brief)

Summary of proposals received by SF Recreation & Parks for the Palace of Fine Arts

New Presidio Parklands — I would like input from the Trust, the GGNRA, and the Parks Conservancy, especially regarding habitat and structures

Design of the Korean War Memorial

Introduction to the Dog Management Plan for the GGNRA

The Trust's Strategy 2020

PLEASE LET ME KNOW YOUR AVAILABILITY AS SOON AS POSSIBLE!

Thank you,

Amy

From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: Re: P4P/P
Date: July 09, 2015 at 9:57 PM America/Los_Angeles
To: Amy Meyer a7w2m@ (b) (6)



Amy, just back in email range ... still on vacation near Yosemite. Week of 7/20 is best for me.
Howard

On Thu, Jul 2, 2015 at 1:49 PM, Amy Meyer <a7w2m@ (b) (6)> wrote:

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Thank you,

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From: Amy Meyer a7w2m@(b) (6)
Subject: Re: P4P/P
Date: July 10, 2015 at 10:14 AM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Thanks, HOward.

The meeting will be on Monday, 7/20. Announcement will be in your bps mail with the agenda on Monday.

Sorry to bother you on vacation— hope it was good.

Amy

On Jul 9, 2015, at 9:57 PM, Howard Levitt and Wendy Scheffers <[\(b\) \(6\)](mailto:howandwen@(b) (6))> wrote:

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Design of the Korean War Memorial

Introduction to the Dog Management Plan for the GGNRA

The Trust's Strategy 2020

PLEASE LET ME KNOW YOUR AVAILABILITY AS SOON AS POSSIBLE!

Thank you,

Amy

Amy Meyer
www.amymeyer.com

From: Amy Meyer amy7w2m@ (b) (6)
Subject: Pacifica and dogs
Date: March 18, 2016 at 2:32 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwer (b) (6)



Howard,

This is the letter Paul sent that I can't seem to get to you from the stupid mail chain. It connects with this:

Howard
Maybe Yani can give me another computer lesson.

This morning you outlined what might be possible in Pacifica: a combination of a small beach of theirs and 1/3 of an acre at Mori Point. I had heard the same from Frank Dean. Is this the time to tell Paul to start looking into this? If so, would you give me a few sentences for him, please. I could begin with "I've heard there is a small Pacifica beach that could be combined with a tiny piece of Mori Point beach that might accomplish some of the access that you want. [Description] Can you look into this?"

Or, another idea? Or, just leave it alone for now?

You and Chris were just fine this morning.

Amy

Paul Jones <pauljonessailor@ (b) (6) >

Mar 17 (1 day)

to Rich, me, Lennie, gbatmuirb, gimmyparkli, ccserve

Hi, Folks: I am going to write my own letter and it's going to say that I'm not supportive of the approach they are taking for San Mateo. I'm going to have to respectfully (and I mean very respectfully) disagree. They are eliminating about 70% of the trails to unleash dog access. I don't see the science behind the decision, which means it's a policy desire. This will have the unwanted effect of creating conflicts where there will be access and funneling dog walkers onto City of Pacifica lands, which are already stressed. GGNRA owns over 50% of the land in Pacifica, so it's not a trivial matter in terms of members of the community affected by this potential rule. There are other scientists who agree with me, so I know I'm not alone. There is a former NPS manager who agrees with my view. MMWD allows dogs on leash on almost all of its lands and you can't say they're ecologically less valuable, plus their watersheds are feed the water supply for Marin. If they can do it, the GGNRA can be a bit more lenient.

As it stands now, a Pacifican can't walk a dog up onto Sweeney Ridge without DRIVING over to Sneath Lane to access the fire road up the hill. Then, you can walk to the Nike site and back. That isn't right. There is no reason that a person can't walk on the Baquiano Trail with a dog onleash up to the "discovery site". It won't harm a butterfly or a bee. It's arbitrary or a misapplication of "science".

I strongly believe, after working for EPA for 26 years, that decisions need to be anchored in policy, law, and science. I don't see it for San Mateo. Can't speak for decisions affecting San Francisco or Marin as I haven't paid much attention to it. But for down here, I'm quite certain there will be a significant backlash that could be avoided.

Sincerely,
Paul

--

www.amywmeyer.com

From: Amy Meyer amy7w2m@ (b) (6)
Subject: Pacifica and dogs
Date: March 18, 2016 at 2:32 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@ (b) (6)



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Sincerely,
Paul

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www.amywmeyer.com

From: Neal Desai ndesai@npca.org
Subject: public engagement stats
Date: July 07, 2015 at 4:28 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)



Howard,

Any sense of how many meetings/public engagement opportunities the NPS has offered throughout this very long process? We would like to be able to present to Pelosi's office that the NPS has engaged the public, including those that disagree with the need for the plan. And I want to also highlight that listening to someone and doing what they want you to do are two different things. And much of what anti-regulation crowd wants from NPS is not supported by law, policy or science.

Thanks,
Neal

From: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Subject: Re: public engagement stats
Date: July 09, 2015 at 9:54 PM America/Los_Angeles
To: Neal Desai ndesai@npca.org



Sorry Neal, just back in email range. We held at least 10 full public meetings, published at least 3 newsletters, made dozens of presentations at comm org mtgs. We have met with recreational and commercial dog walking groups on at least 10 occasions, and have met with non dogwalking stakeholders another 6-8 times. We have handed out thousands of cards to park visitors inviting them to review and comment on the two versions of the plan, and to attend the public meetings. We have read and evaluated thousands of comments from a full range of stakeholders on two draft dog plans - DEIS and SEIS. We have provided around 50 radio and television interviews on the dog planning process. I could go on, but you get the idea. Thanks for your help with Pelosi. Chris and I will be meeting with Dan Bernal and patching in her WASO office on 7/15. Howard

On Tue, Jul 7, 2015 at 4:28 PM, Neal Desai <ndesai@npca.org> wrote:

Howard,

Any sense of how many meetings/public engagement opportunities the NPS has offered throughout this very long process? We would like to be able to present to Pelosi's office that the NPS has engaged the public, including those that disagree with the need for the plan. And I want to also highlight that *listening to someone* and *doing what they want you to do* are two different things. And much of what anti-regulation crowd wants from NPS is not supported by law, policy or science.

Thanks,
Neal

From: Amy Meyer a7w2m@**(b) (6)**
Subject: Questions
Date: July 13, 2015 at 5:21 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Cc: Becky Evans rebecca@**(b) (6)**, Neal Desai ndesai@npca.org



Howard:

You wrote:

3. The sites that are most contested in the park are those which are popular with all users - Fort Funston, Ocean Beach, Crissy Field, Rodeo Beach, and Muir Beach. Four of these areas have proposed off-leash areas. Others of the 22 areas originally evaluated for use zoning are also used and enjoyed by a broad spectrum of visitors.

Is Muir Beach the one not permitting off-leash dogs?

5. In addition to the 7 proposed off leash areas, there are 21 areas (including some that also permit off leash) that propose on-leash dog walking.

Please give us the names of all 7 off-leash areas.

6. Commercial dog walking is permitted in many park areas; NPS authority to permit this use is contested by several groups.

Does this mean many other National Park areas? Or many of the 21 on-leash areas of this national park? And are all these dogs on leash with their handlers? Or, in areas such as the northern end of Ocean Beach which I am sure is off-leash, can the commercial dogs run off-leash with the others?

General question:

We have to be informed about the commercial dog walkers and their role in this issue. Do you know, are they very active in asserting their interests at this time? Do they argue about the need to have more dogs with one handler?

Amy

From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: Re: Questions
Date: July 13, 2015 at 6:05 PM America/Los_Angeles
To: Amy Meyer a7w2m@(b) (6)
Cc: Becky Evans rebecca@ (b) (6), Neal Desai ndesai@npca.org



See below. in ALL CAPS. Howard

On Mon, Jul 13, 2015 at 5:21 PM, Amy Meyer <a7w2m@(b) (6)> wrote:

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Please give us the names of all 7 off-leash areas.

RODEO BEACH; FORT MASON GREAT MEADOW (TWO AREAS); CRISSY FIELD (TWO AREAS); FORT FUNSTON (TWO AREAS)

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I NEED TO CHECK THIS ONE, BUT HERE'S WHAT I BELIEVE ON THIS.

Does this mean many other National Park areas? NO, ONLY GOGA

Or many SOME of the 21 on-leash areas of this national park? YES

And are all these dogs on leash with their handlers? NO, SOME ARE OFF LEASH, WHERE OTHERWISE PERMITTED.

Or, in areas such as the northern end of Ocean Beach which I am sure is off-leash, can the commercial dogs run off-leash with the others? YES, BUT THERE WOULD BE A 3 DOG MAX LIMIT AT OCEAN BEACH.

IN THE SEIS, COMMERCIAL DOG WALKERS WILL BE LIMITED TO CERTAIN AREAS AND WILL BE SUBJECT TO THE 6 DOG MAXIMUM. IN THE SEIS, ONLY ALTA TRAIL, RODEO BEACH, FORT BAKER, FORT MASON, CRISSY FIELD, BAKER BEACH, AND FORT FUNSTON WOULD PERMIT MORE THAN 3 DOGS.

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AFTER SOME GRUMBLING, MOST OF THE COMMERCIAL DOG WALKERS HAVE COMPLIED WITH THE INTERIM RULE. I'M CERTAIN MOST RESENT THE REQUIREMENTS AND THE FEES. THEY DO NOT APPEAR TO BE ACTIVELY OPPOSING THE PLAN - MOST ARE BUSINESS PEOPLE WHO JUST WANT TO KNOW THE RULES. HOWEVER, I'M SURE SOME OF THE COMM DOG WALKERS ARE ACTIVE WITH THE REC DOG USER GROUPS TO OPPOSE THE PLAN.

Amy

From: Amy Meyer a7w2m@(b) (6)
Subject: Re: Questions
Date: July 13, 2015 at 7:17 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Cc: Neal Desai ndesai@npca.org, BeckyE rebecca@(b) (6)



This helps a lot.
One more? Where is Alta trail?

On Jul 13, 2015, at 6:05 PM, Howard Levitt and Wendy Scheffers <howandwen@(b) (6)> wrote:

See below. in ALL CAPS. Howard

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From: Howard Levitt and Wendy Scheffers howandwen@ (b) (6)
Subject: Re: Questions
Date: July 13, 2015 at 7:23 PM America/Los_Angeles
To: Amy Meyer a7w2m@ (b) (6)
Cc: Neal Desai ndesai@npca.org, BeckyE rebecca@ (b) (6)



On Jul 13, 2015, at 7:17 PM, Amy Meyer wrote:

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RIDGE ABOVE MARIN CITY, UP DONOHUE STREET.

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See below. in ALL CAPS. Howard

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Amy

From: Howard Levitt and Wendy Scheffers [\(b\) \(6\)](mailto:howandwen@(b) (6))
Subject: Re: Correct # of GGNRA visitors.URGENT
Date: February 22, 2016 at 8:37 PM America/Los_Angeles
To: Neal Desai ndesai@npca.org



Can you send a link, Neal? I can't find it online.

On Feb 22, 2016, at 8:33 PM, Neal Desai wrote:

[His story just posted. Doesn't reflect balance and necessary facts](#)

From: Howard Levitt and Wendy Scheffers [[\(b\) \(6\)](mailto:howandwen@(b) (6))]
Sent: Monday, February 22, 2016 8:32 PM
To: Neal Desai
Subject: Re: Correct # of GGNRA visitors.URGENT

Glad he spoke with you. Yes, we shall see. Fingers crossed. Thank you!!

On Feb 22, 2016, at 7:47 PM, Neal Desai wrote:

Just spoke to him. I communicated the balance that this plan strikes. He mentioned that he has been fielding calls from numerous dog walkers. We shall see how this turns out.

From: Howard Levitt and Wendy Scheffers [[\(b\) \(6\)](mailto:howandwen@(b) (6))]
Sent: Monday, February 22, 2016 7:46 PM
To: Neal Desai
Subject: Re: Correct # of GGNRA visitors.URGENT

Wanted to know what % of the park would be closed to off-leash vs current situation. His angle seemed to be what the off-leash community was losing. Said he understood the need for balance, etc, but we shall see. Did you speak with him?

On Mon, Feb 22, 2016 at 6:52 PM, Neal Desai <ndesai@npca.org> wrote:

What did Steve ask about? I sent him our statement and FAQs

On Feb 22, 2016, at 6:49 PM, "Howard Levitt and Wendy Scheffers" <[\(b\) \(6\)](mailto:howandwen@(b) (6))> wrote:

Neal is correct for GGNRA only - figure of 17.5 includes MUWO and FOPO. I explained this to Steve Rubenstein of the Chron and Mark Prado. They seemed to get it. I generally provide both GOGA's # initially, and then go on to point out that there are two other units under GOGA mgt, and the total was 17.5 in 2015, second highest in NPS.

On Mon, Feb 22, 2016 at 5:56 PM, Amy Meyer <[\(b\) \(6\)](mailto:amy7w2m@(b) (6))> wrote:

Howard: Neal is using 14.9 million

I heard Chris use 17 million

We need ONE accurate figure right away that we all agree on.

Thanks,
Amy

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www.amywmeyer.com

From: Howard Levitt and Wendy Scheffers [\(b\) \(6\)](mailto:howandwen@(b) (6))
Subject: Re: Correct # of GGNRA visitors.URGENT
Date: February 22, 2016 at 8:48 PM America/Los_Angeles
To: Neal Desai ndesai@npca.org



Just saw it. Typical coverage for the Chron. Really glad your points made it in, otherwise there would have been zero balance.

On Feb 22, 2016, at 8:33 PM, Neal Desai wrote:

[His story just posted. Doesn't reflect balance and necessary facts](#)

From: Howard Levitt and Wendy Scheffers [[\(b\) \(6\)](mailto:howandwen@(b) (6))]
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www.amywmeyer.com

From: Amy Meyer amy7w2m@(b) (6)
Subject: Re: Dog Management
Date: April 22, 2016 at 11:04 PM America/Los_Angeles
To: Norman LaForce n.laforce@(b) (6)
Cc: BeckyE rebecca@ (b) (6) (b) (6), Alan Carlton carltonal@ (b) (6) (b) (6), Neal Desai ndesai@npca.org



Thanks so much, Norman.
Here's hoping.
Amy

On Fri, Apr 22, 2016 at 8:52 PM, Norman LaForce <n.laforce@(b) (6)> wrote:

I sent this The Chronicle.

Thanks to Tom Stienstra, "Some Bay Area parks throw dog owners a bone, " for reporting on the wide variety of places in the Bay Area where dogs may be locally exercised and enjoyed. He also makes clear the agencies that help make this possible, but notes that further restrictions are intended in the Golden Gate National Recreation Area. He doesn't say why this is happening, which everyone needs to understand. Dogs are almost never allowed in national parks because of their outstanding natural resources. GGNRA has to be administered so as to conform with national policies and regulations and the park's enabling legislation— which is not happening now. By creating a Special Rule for dogs in GGNRA, they will be able to enjoy 22 areas on-leash, and 7 areas off-leash in San Francisco, Marin, and San Mateo counties. Other visitors will have dog-free areas to enjoy. [This is a win-win for everyone.](#)

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From: Howard Levitt and Wendy Scheffers howandwen@ (b) (6)
Subject: Re: Dog Management
Date: April 22, 2016 at 11:19 PM America/Los_Angeles
To: Amy Meyer amy7w2m@ (b) (6)
Cc: Norman LaForce n.laforce@ (b) (6) (b) (6) BeckyE rebecca@ (b) (6) (b) (6) Alan Carlton carltonal@ (b) (6) (b) (6)
Neal Desai ndesai@npca.org



Great letter, Norman. Thanks for passing this on, Amy. Howard

On Apr 22, 2016, at 11:04 PM, Amy Meyer wrote:

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From: Norman LaForce n.laforce@**(b) (6)**
Subject: RE: Dog Management
Date: April 23, 2016 at 8:26 AM America/Los_Angeles
To: "Howard Levitt and Wendy Scheffers" howandwen@**(b) (6)** **(b) (6)** "Amy Meyer"
amy7w2m@**(b) (6)**
Cc: "BeckyE" rebecca@**(b) (6)** **(b) (6)** "Alan Carlton" carltonal@**(b) (6)** **(b) (6)** "Neal Desai" ndesai@npca.org



Amy had a hand in it, too.

From: Howard Levitt and Wendy Scheffers [mailto:howandwen@**(b) (6)**]
Sent: Friday, April 22, 2016 11:20 PM
To: Amy Meyer
Cc: Norman LaForce; BeckyE; Alan Carlton; Neal Desai
Subject: Re: Dog Management

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From: BeckyE rebecca@ (b) (6)
Subject: RE: Dog Management
Date: April 23, 2016 at 9:10 AM America/Los_Angeles
To: Norman LaForce n.laforce@ (b) (6) (b) (6); "Howard Levitt and Wendy Scheffers"
howandwen@ (b) (6) (b) (6) "Amy Meyer" amy7w2m@ (b) (6)
Cc: "BeckyE" rebecca@ (b) (6) (b) (6) "Alan Carlton" carltonal@ (b) (6) (b) (6) "Neal Desai" ndesai@npca.org



Amy had a hand in it, too.

From: Howard Levitt and Wendy Scheffers [mailto:howandwen@ (b) (6)]
Sent: Friday, April 22, 2016 11:20 PM
To: Amy Meyer
Cc: Norman LaForce; BeckyE; Alan Carlton; Neal Desai
Subject: Re: Dog Management

Great letter, Norman. Thanks for passing this on, Amy. Howard

On Apr 22, 2016, at 11:04 PM, Amy Meyer wrote:

Thanks so much, Norman.
Here's hoping.
Amy

On Fri, Apr 22, 2016 at 8:52 PM, Norman LaForce <n.laforce@ (b) (6)> wrote:

I sent this [The Chronicle](#).

Thanks to Tom Stienstra, "Some Bay Area parks throw dog owners a bone, " for reporting on the wide variety of places in the Bay Area where dogs may be locally exercised and enjoyed. He also makes clear the agencies that help make this possible, but notes that further restrictions are intended in the Golden Gate National Recreation Area. He doesn't say why this is happening, which everyone needs to understand. Dogs are almost never allowed in national parks because of their outstanding natural resources. GGNRA has to be administered so as to conform with national policies and regulations and the park's enabling legislation— which is not happening now. By creating a Special Rule for dogs in GGNRA, they will be able to enjoy 22 areas on-leash, and 7 areas off-leash in San Francisco, Marin, and San Mateo counties. Other visitors will have dog-free areas to enjoy. [This is a win-win for everyone.](#)

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From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: Re: Dog Management
Date: April 23, 2016 at 10:55 PM America/Los_Angeles
To: Norman LaForce n.laforce@(b) (6)
Cc: "Amy Meyer" amy7w2m@(b) (6) (b) (6) "BeckyE" rebecca@(b) (6) (b) (6) "Alan Carlton" carltonal@(b) (6) (b) (6)
"Neal Desai" ndesai@npca.org



I suspected as much. Howard

On Apr 23, 2016, at 8:26 AM, Norman LaForce wrote:

Amy had a hand in it, too.

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Sent: Friday, April 22, 2016 11:20 PM
To: Amy Meyer
Cc: Norman LaForce; BeckyE; Alan Carlton; Neal Desai
Subject: Re: Dog Management

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From: [Howard Levitt and Wendy Scheffers](#)
To: [BeckyE](#)
Subject: Re: Fw: Re: Thank you for supporting recreation for all and protection of imperiled wildlife at GGNRA with your vote today
Date: Thursday, March 24, 2016 2:41:29 PM

thanks, Becky!

On Thu, Mar 24, 2016 at 2:28 PM, BeckyE <[<rebecae@\(b\) \(6\)>](mailto:rebecae@(b) (6))> wrote:

-----Forwarded Message-----

From: Cindy Margulis
Sent: Mar 24, 2016 12:25 PM
To: Neal Desai
Cc: Brent Plater , "BeckyE ([<rebecae@\(b\) \(6\)>](mailto:rebecae@(b) (6)))" , "[<amy7w2m@\(b\) \(6\)>](mailto:amy7w2m@(b) (6))"
Subject: Re: Thank you for supporting recreation for all and protection of imperiled wildlife at GGNRA with your vote today

I've returned from being away.

I just wanted to let you all know that Golden Gate Audubon has issued an electronic Action Alert to its thousands of members about the Dog Rule with links to contact the relevant US Congressional legislators.

Here's a weblink to what we'd sent:

<http://goldengateaudubon.org/expired-announcement/news/support-sensible-new-dog-rules-for-the-ggnra/>

There's also a post on our Facebook page, as well.

Feel free to re-post from the Golden Gate Audubon FB, if desired, to make it easy-peasy for folks to comment to our region's federal legislators.

Cindy

On Tue, Mar 15, 2016 at 5:28 PM, Neal Desai <ndesai@npca.org> wrote:

Supervisor Mar,

Thank you for speaking up for the balance that the proposed rule creates for all park users and imperiled wildlife, and for the oppositional, unconstructive nature of the resolution.

Much appreciated, and conservation groups and stakeholders who use the park will continue to push for the approval of the plan. Please let us know what else you may need in the future regarding this matter or the GGNRA generally.

Thanks again,

Neal

p.s. interestingly and ironically, this is what Matier & Ross last month said about Katy Tang and resolutions:

Woods Day: San Francisco Supervisor **Katy Tang** was unusually candid about why she joined her fellow board members in their unanimous vote for a day of remembrance for **Mario Woods**, the man shot to death by five police officers Dec. 2 when he refused to drop a knife.

In an e-mail to constituent **Kathy Lewis**, who was upset by the board's action, **the moderate Tang said she was "not a fan of these nonbinding resolutions."** But if she had voted no, she said, the measure would have gone to committee for debate and "I would have have caused more media attention and more protests and more discord."

"I would have become the next focus of the Black Lives Matter movement," Tang said.

As for why some of her board colleagues pushed for the resolution in the first place?

"It is for the media attention," Tang wrote. "In fact, that's usually the only reason why supervisors introduce resolutions."

--

Cindy Margulis
Executive Director
Golden Gate Audubon Society
2530 San Pablo Ave., Suite G
Berkeley, CA 94702
Tel: [\(510\) 843-9912](tel:(510)843-9912)
www.goldengateaudubon.org

From: [Howard Levitt and Wendy Scheffers](#)
To: [Neal Desai](#)
Subject: Re: reordered #5
Date: Tuesday, July 14, 2015 9:01:40 PM

Sorry I couldn't call you earlier, Neal. Will call tomorrow.

On Jul 14, 2015, at 4:05 PM, Neal Desai wrote:

Reworded and rearranged below.

From: Amy Meyer [mailto:a7w2m@**(b) (6)**]
Sent: Tuesday, July 14, 2015 3:30 PM
To: Neal Desai; Becky Evans
Cc: Howard Levitt and Wendy Scheffers
Subject: reordered #5

5 still doesn't read right, and it must be because of Jackie Speier.

Reordered 5 as follows while still waiting for Howard:

5. NPS carefully assessed every area governed by the 1979 Pet Policy **and additional lands sold or donated to the park since then, such as San Mateo County lands**. GGNRA identified 8 areas where they feel off-leash dog experience can be provided **without threatening wildlife and habitat, and which also permitted opportunities for those who want a dog-free experience. A number of on-leash sites were also identified**. In many instances, the original land manager prior to GGNRA did not allow off-leash dog walking, though the use was continuing illegally. When NPS or other federal land management agencies review park uses, **such as cattle grazing or off-road vehicle recreation**, they do not grandfather in uses that are conducted against regulations.

From: Frank_Dean@nps.gov
To: [Howard Levitt and Wendy Scheffers](#)
Cc: Howard_Levitt@nps.gov
Subject: Re: Sharp post-mortum
Date: Tuesday, October 04, 2011 11:29:31 PM

Howard,

I have been thinking about this as well and thought it had passed. We'll get through it and I know the other parties have not been genuine and we are obviously not in step with "the establishment" on this issue. We should meet with Speier to get her to understand we are not the enemy. Not sure who prompted her to write the letter, but there is a machine of sorts at work on this golf issue.

Don't worry, but let's figure out a measured response or approach. Sharp is not a priority and I let others make it into one for us because we are so busy.

Dogs and AC34 are other issues where we can step on a rake and you have always done good work in communicating our message.

Hey, our jobs would be easy if we just got to tell everyone what they wanted to hear. We do stand for our agency and ethical principles unlike some "allies" named in her letter.

Good park news coming on Thursday!

Thanks,

Frank

Frank Dean
General Superintendent
Golden Gate
National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

----- Original Message -----

From: Howard Levitt and Wendy Scheffers [howandwen@**(b) (6)**]
Sent: 10/04/2011 09:43 PM MST
To: Frank Dean
Cc: Howard Levitt
Subject: Sharp post-mortum

Hi Frank:

I'm completely bummed out about the Speier letter and the fallout from our Sharp statement. I think this will pass, and I'm not imagining any irreparable breaks in our relationships with Dave or Phil. And we did gain cred with some of our best longterm supporters.

But meanwhile, I can't help but replay the scenarios. Neither Phil nor Dave have been entirely communicative on what they were cooking up at Sharp, but regardless, I probably should have given them a heads-up

that the statement was forthcoming, even while holding firm that we would issue it. I apologize to you for not taking that step and contributing to this situation.

We'll deal with Speier's office when we can get a meeting with her, but let's talk tomorrow on the best steps to patch things up with Phil and Dave. As I mentioned, I would like to contact Phil and Dave, but let's talk.

HL

From: [Frank Dean](#)
To: [Howard Levitt and Wendy Scheffers](#); [Howard Levitt](#)
Subject: Re: Stienstra today
Date: Monday, January 20, 2014 1:02:55 PM

Howard,

I know Tom is a regular columnist, but not sure how serious or credible he is taken given his style, but perhaps has a following. Would be nice to have him get to know us. Perhaps Mia can vouch for the park or even a brief meeting with me- an old school ranger, for future consideration in subsequent articles? Frustrating that the other side is planting all these misconceptions.

Frank Dean
General Superintendent
Golden Gate National Recreation Area
201 Fort Mason
San Francisco, CA 94123
(415) 561-4720

On Jan 20, 2014, at 12:40 PM, Howard Levitt and Wendy Scheffers <howandwen@**(b) (6)**> wrote:

> Saw it first thing - despicable I'm corresponding with Frank about asking Neal or someone else to send a letter to the editor in response to this absurd article. Don't let the article bring you down - Stienstra is a dog owner who often writes about enjoying his dog in the wilderness. Howard

>

> On Jan 20, 2014, at 10:42 AM, Amy Meyer wrote:

>

>> Hi Howard,

>>

>> Thanks to Rich Bartke who was writing to me about something else I saw the dog rant in Stienstra's column on p. B2 today.

>>

>> unhappily,

>> Amy

>

From: [Howard Levitt](#)
To: [Frank Dean](#)
Cc: [Howard Levitt and Wendy Scheffers](#)
Subject: Re: Stienstra today
Date: Monday, January 20, 2014 1:06:16 PM

Okay to set Neal or Amy in motion? This one merits a response, esp the slam on rangers.

Sent from my iPhone

On Jan 20, 2014, at 1:02 PM, Frank Dean <frank_dean@nps.gov> wrote:

> Howard,
>
> I know Tom is a regular columnist, but not sure how serious or
> credible he is taken given his style, but perhaps has a following.
> Would be nice to have him get to know us. Perhaps Mia can vouch for
> the park or even a brief meeting with me- an old school ranger, for
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> Frank Dean
> General Superintendent
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> 201 Fort Mason
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>>> unhappily,
>>> Amy

>>

From: [Howard Levitt and Wendy Scheffers](#)
To: [BeckyE](#)
Cc: [Neal Desai](#); [Amy Meyer](#)
Bcc: [chris_lehnertz@](#)(b) (6)
Subject: Re: Thank you for the meeting
Date: Tuesday, July 21, 2015 11:26:58 PM

Dear Becky, Amy, and Neal:

You're marvelous friends - thank you so much! These actions will be hugely important in the next phase, as the draft Rule is completed and released for comment. Let's stay in touch ...
Howard

On Jul 21, 2015, at 10:42 AM, BeckyE wrote:

fyi . . .

-----Forwarded Message-----

From: BeckyE
Sent: Jul 21, 2015 10:41 AM
To: Dan Bernal
Cc: Amy , Neal Desai , Becky Evans
Subject: Thank you for the meeting

Dear Dan,

Thank you for meeting with us for an informative session about the pending GGNRA Dog Management Plan.

You told us that the Leader's Office is receiving many comments from opponents to the Plan.

- In the future, you will hear more from the stakeholders who support the Dog Management Plan.
- Our organizations will continue to educate the public with significant scientific and factual information supporting the balanced NPS decision-making as the misinformation campaign is waged by those that simply oppose regulation. We'll provide key points for your use, such as what we shared with you regarding debunking the "less than 1% of GGNRA for dog walking" claim.
- Our organizations will encourage a maximum comment period on the SEIS - from 60 to 90 days.
- The celebration of all forms of recreation as part of the NPS Centennial and seek people "without baggage? is an excellent

idea and we will explore possibilities to implement this suggestion.

- When the Plan process is done we'll seek ways to celebrate what is being permitted here and nowhere else.
- We'll assist the NPS in enlisting as many different stakeholders as possible to help implement the Plan.

Dan, thank you very much for your time and attention to this complex matter.

Best regards,

Amy Meyer
Becky Evans
Neal Desai

From: [Diane Dean](#)
To: [Howard Levitt and Wendy Scheffers](#)
Subject: Re: today's column
Date: Monday, January 20, 2014 7:04:58 PM

Howard, well done sir! Thanks to you and Thomas.

Frank

On Jan 20, 2014, at 3:54 PM, Howard Levitt and Wendy Scheffers
<[<howandwen@\(b\) \(6\)>](mailto:howandwen@(b) (6))> wrote:

Frank, - my Stanford prof, cycling, and football buddy - just fired this off to Tom Stienstra. Written in classic academic English, Tom nevertheless calls Stienstra to task. Not sure what, if any the response will be. HL

Begin forwarded message:

From: Thomas A Ryckman <[<tryckman@\(b\) \(6\)>](mailto:tryckman@(b) (6))>
Date: January 20, 2014 3:00:43 PM PST
To: tstienstra@sfchronicle.com
Subject: today's column

Dear Mr. Stienstra,

I read your column regularly and usually with enjoyment. Since coming to SF in 1999, my wife and I have learned much from you about the wonderful walks in and around the Bay Area, and from your coverage of the wonders of (by Eastern standards) subtle seasonal changes in California.

However today I was both disappointed and annoyed. As I understand it, the GGNRA dog leash plan has been carefully drafted to balance the interests of dog owners with a mandate that fragile natural habitats must be protected. It is not the arbitrary imposition of government whim or a ukase from a remote faceless bureaucrat. In this matter, which I have followed for some time, dog owner groups are acting like spoiled children, selfishly putting their supposed entitlement (though allegedly speaking for their pets) above the general good of the public, a good that includes passing on to future generations the few remaining strips of wildlife habitat in the Bay Area. As with other areas of environmental protection, past practice or precedent is not, and should not be, an inviolable standard going forward. I do not see, as many dog owners do, that one can legitimately speak here of an infringement of "rights". In this narcissistic society, claims about "rights" are as common as blackberries and just about as meaningful.

Your remarks about government and park rangers may elicit praise from dog owners but they are irresponsible. You might ask the people of Charleston, WV about the necessity of "a lot of new rules and enforcement". And your opinion that "It is common these days that rangers do not live within the community of the parks they patrol" requires evidence. Even if true, the same could be said for many of the police and firemen working in communities in the Bay Area. You do a disservice to your readers to pander to a particular constituency on this issue.

Sincerely,

Thomas Ryckman

From: [Howard Levitt and Wendy Scheffers](#)
To: [Amy Meyer](#); [Greg Moore](#); [Greg Moore](#); [frank and diane dean](#)
Cc: [Howard Levitt](#)
Subject: Re: What's going on with Huey?
Date: Sunday, May 04, 2014 11:38:38 AM

Dear Amy: Huey's way off the deep end, and this deeply offensive piece cannot stand uncontested. Below is a link to the Fimrite article. Maybe all of us can connect by phone today or tomorrow to consider a rejoinder and refutation of this malicious nonsense. Howard

<http://www.sfgate.com/default/article/Golden-Gate-National-Recreation-Area-proposes-5436978.php>

On May 4, 2014, at 10:59 AM, Amy Meyer wrote:

Dear Howard,

Greg Moore just sent this nasty screed by Huey against the Conservancy. I am trying to get my arms around what is going on and am working on what I can do to help.

Do you have the article electronically that Peter Fimrite did last week? I want to see it for context. Probably that has to wait until tomorrow, but please send it to me as soon as you can.

Thanks,
Amy

Marin Voice: Keep recreation in GGNRA

By Huey D. Johnson
Guest op-ed column

Posted: 05/03/2014 06:45:00 PM PDT

SAN FRANCISCO is being highlighted nationally this year with 600 showings on the nation's TV stations of the lovely film, "Rebels with a Cause."

Produced by Santa Rosa's KCRB and local filmmakers Nancy Kelly and Kenji Yamamoto, the documentary tells the story of the struggle to establish the Golden Gate National Recreation Area through the dreams of honorable politicians and the fast-moving land purchases made by small nonprofits that make up the GGNRA today.

That now-preserved recreation landscape includes 40 miles of seashore landscape reaching from Bolinas in the north, across the Golden Gate Bridge, to San Mateo County in the south. Its history goes back to post-World War II, when with the help of a cooperative Congress the federal government sought to ease urban pressure by providing recreation. Under Chairman Laurance Rockefeller, the Outdoor Recreation Review Commission hired hundreds of experts to study how recreation could improve our stressful urban condition.

Results included establishment of the Land and Water Conservation Fund. I recall the fund provided \$113 million. Without it there wouldn't be a GGNRA.

The GGNRA is intended especially for workers and retirees, those living in small apartments with no backyards and no place to walk their dogs. In light of the source and purpose of the LWCF money, the current political maneuvering to end dog walking is absurd. Owners can train, control and pick up after dogs. And there are already clear rules in place with respect to pets in the GGNRA that need to be enforced and supported.

As happens, a nonprofit Golden Gate National Park Conservancy has emerged that wants to limit public use of the GGNRA. This was never the intent or the purpose of the GGNRA. The principal activity of the national parks advocacy group is fundraising, and wealthy donors who are led to believe they are giving to an environmental cause have donated millions of dollars that is given to government.

This is a mistake.

Such groups have wonderful promise as a way of providing volunteers to assist GGNRA needs, but raising money for government isn't sensible. They are overdue in checking out the British National Trust, or the Friend of Austria's Vienna Woods. These two are marvelously successful and they don't send money to government.

Meanwhile, as the parks conservancy skims millions of dollars from San Francisco regional environmental giving, important environmental nonprofits are starving trying to compete with it to do their more important work. It's the efforts of Earth Justice, 350.org and the Sierra Club that are doing the most to fulfill the dreams of the first Earth Day.

We can't afford to let something like an attempt to ban dogs or restrict access in the GGNRA distract us from the true environmental issues of our day — climate

change, fracking, water scarcity — that deserve the vision and leadership of the Bay Area.

True environmental leadership must remain our most important legacy.

We know that the role the GGNRA plays in our regional health and identity is unparalleled. We are obligated to honor its origins, protect its multiple uses, provide a place for hikers, bikers, dogs and kids and show the rest of the country why we deserve to have its bounty so close at hand.

Huey D. Johnson of Mill Valley is the founder of Resource Renewal Institute, a non-profit organization that deals with environmental sustainability. As director of the Nature Conservancy, he helped save the Marin Headlands from development. He was also the founder of the Trust for Public Land and served as secretary of resources during Gov. Jerry Brown's first term.

From: Frank_Dean@nps.gov
To: [Howard Levitt and Wendy Scheffers](#); [Howard Levitt](#)
Subject: Re: Wiener Hearing
Date: Wednesday, April 06, 2011 8:09:41 AM

Okay, let's talk on a break today. I don't feel comfortable waiting until Friday as we may need external advice.

Frank Dean
General Superintendent
Golden Gate
National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

----- Original Message -----

From: Howard Levitt and Wendy Scheffers [howandwen@(b) (6)]
Sent: 04/05/2011 09:58 PM MST
To: Frank Dean
Subject: Wiener Hearing

Hi Frank:

Spoke with Alex tonight about this - I know you're concerned; so am I. I think we will be fine if we stick with some key messages, and position ourselves as empathetic to the city's concerns and concerns of dog users in general, but firm in our commitment to manage the park to create a balance among the desires of various user groups and our mandate to protect resources into the future. We need to emphasize that everyone is contending for the same prime real estate. If we feel we can use any data from the SFSU report, we can say that while dog use is a major activity in the park, it is still a small minority of users. I think we can point out that we will listen to all comments, but that we know that the dog community is disproportionately represented in the comments. We must avoid any discussion of science - this plan is about sound, balanced public policy, but clearly reflects our need to protect known habitats of known species. On Fri, we can fine-tune the powerpoint and rehearse our talking points against the questions we know will be asked.

Howard

From: Gregory Moore mooregreg@ (b) (6)
Subject: Some Thoughts
Date: February 13, 2016 at 10:30 AM America/Los_Angeles
To: "Howard Levitt and Wendy Scheffers" howandwen@ (b) (6)



Hi Howard,

I hope I can be honest with my reactions to the presentation of the staff power point on the DMP and Rule that we previewed yesterday. I found it rather alarming. Additionally, I found the tone was slightly “preachy” and almost propagandist sounding to me. Finally, the graphic presentation was extremely difficult to follow and read. I tried to express my reactions in a positive way and hope I did not offend anyone or cause hurt feelings.

Most of all, it made me wonder about the public facing communications. I believe:

- The tone should be humble, something like. *We are really grateful that so many people enjoy visiting our parks with such a variety of experiences and expectations. We are lucky to have so many people who care so much. We are working with the public to help ensure that everyone has a positive and safe visit, that the park supports a diversity of experiences and that the park’s beauty, history and nature are protected. This isn’t an easy task given how much park visitation has grown and how varied people’s expectations are. After 16 years (?) of consideration with lots of public comment, we want to move to greater clarity and certainty about an issue of intense public expectation and opinion. We are asking our community to help us prepare the park for its future.*
- The information needs key points that are consistent and have a clear “return to message.”
- I do truly believe that the message needs to be simplified. For example, our goals in this plan center on three things:
 1. **THE VISITOR**
 - § Providing for a variety of park experiences
 - § Ensuring a safe visit
 - § Providing a conflict-free experience for visitors
 2. **THE PARK**
 - § Preserving the park’s natural and cultural resources
 - § Protecting rare and endangered plants and wildlife
 - § Providing necessary park stewardship, maintenance and facilities
 3. **CLARITY For PARK VISITORS**
 - § Ensuring that visitors can share the park through approved plans, guidelines and rules
 - § Giving visitors clarity about where and how they can enjoy the park
 - § Providing greater certainty about how people can enjoy the park
- It is important to maintain public empathy with the challenge the NPS faces in the policy debate. If any staff member is imperious, defensive or preachy, this empathy will be lost.
- Are there message points, speaking points or practice sessions for park spokespersons? If not, that is probably needed. There are many skills of active listening, “congruent sending,” etc. that could be useful.

Just some thoughts, Howard. I hope you know my intention is to be supportive, not just critical.

Greg

From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: Re: Some Thoughts
Date: February 13, 2016 at 5:53 PM America/Los_Angeles
To: Gregory Moore mooregreg@(b) (6)



Hi Greg,

Of course you can be candid with me - after all these years, what's the point in dancing and dodging. I also always appreciate your insight ... so thanks.

I don't think Thursday's presentation represented how the staff trainings will go; the presentation has been revamped based on the discussion.

Re the tone and content. Here's the thing about tone - Adrienne is new to this, so she sometimes comes across as a bit didactic ... not preachy, but a little smug. I have already talked to hear about that. I will be attending most of the staff trainings to make sure we don't impart a sense that we're going to be anything but respectful of park visitors, dog advocates, etc.

So... arrogance, aggressiveness, dismissiveness, smugness, rigidity, etc = NO. Empathy, concern, humility, patience, etc = YES.

The purpose of the staff trainings is to alert them to the upcoming release and how it might (or might not) generate feelings or concerns among park visitors, and what they should know in order to be able to keep any encounter positive. For your field staff, and ours non-managers, we will emphasize that all they really want to do is let those who inquire know how to comment, and if necessary to assure the inquirer that the Prop Rule is NOT a decision. Also to let staff know that they should punt quickly to someone on the Comm team if there is any question of substance. Staff will understand that they are not part of the ground game on this issue.

Chris wanted staff to have the big picture - hence all the background, but we'll be certain to frame that as merely background for staff knowledge, not an empowerment to engage with visitors.

Re spokespersons, I will be the primary (almost exclusive) public/media/elected official spokesperson- along with Chris, of course. Mike S will not speak to the media, nor will Adrienne, nor will Alex. I plan to personally deliver all of the stakeholder presentations. I long ago mastered the art of active listening and I am very empathetic re the importance of dogs in peoples' lives and their recreation preferences.

But I will be shifting my approach from past presentations in that I will be making the case for the reasonableness of the Prop rule/plan. I have learned that leading with the statement that we have produced the most dog-friendly plan possible, with accompanying facts on how much dog use will be permitted, but following that with a statement that we cannot view visitor use through a single lens, elicits nods of support from all but the avowed off-leash advocates.

When I get back to the office next week, I will send you the latest version of a Dog Mgt Communications Plan that we have been going back and forth with WASO about. Some of the message points in that look as if they were written by govt lawyers, vs communicators ... because they were. You have no idea how many cooks are in this kitchen.

Enjoy your weekend. Wendy and I are going to Tahoe tonight for some X-try skiing.

Howard

On Feb 13, 2016, at 10:30 AM, Gregory Moore wrote:

Hi Howard,

I hope I can be honest with my reactions to the presentation of the staff power point on the DMP and Rule that we previewed yesterday. I found it rather alarming. Additionally, I found the tone was slightly “preachy” and almost propaganda sounding to me. Finally, the graphic presentation was extremely difficult to follow and read. I tried to express my reactions in a positive way and hope I did not offend anyone or cause hurt feelings.

Most of all, it made me wonder about the public facing communications. I believe:

- The tone should be humble, something like. *We are really grateful that so many people enjoy visiting our parks with such a variety of experiences and expectations. We are lucky to have so many people who care so much. We are working with the public to help ensure that everyone has a positive and safe visit, that the park supports a diversity of experiences and that the park’s beauty, history and nature are protected. This isn’t an easy task given how much park visitation has grown and how varied people’s expectations are. After 16 years (?) of consideration with lots of public comment, we want to move to greater clarity and certainty about an issue of intense public expectation and opinion. We are asking our community to help us prepare the park for its future.*
- The information needs key points that are consistent and have a clear “return to message.”
- I do truly believe that the message needs to be simplified. For example, our goals in this plan center on three things:
 1. **THE VISITOR**
 - § Providing for a variety of park experiences
 - § Ensuring a safe visit
 - § Providing a conflict-free experience for visitors
 2. **THE PARK**
 - § Preserving the park’s natural and cultural resources
 - § Protecting rare and endangered plants and wildlife
 - § Providing necessary park stewardship, maintenance and facilities
 3. **CLARITY For PARK VISITORS**
 - § Ensuring that visitors can share the park through approved plans, guidelines and rules
 - § Giving visitors clarity about where and how they can enjoy the park
 - § Providing greater certainty about how people can enjoy the park
- It is important to maintain public empathy with the challenge the NPS faces in the policy debate. If any staff member is imperious, defensive or preachy, this empathy will be lost.
- Are there message points, speaking points or practice sessions for park spokespersons? If not, that is probably needed. There are many skills of active listening, “congruent sending,” etc. that could be useful.

Just some thoughts, Howard. I hope you know my intention is to be supportive, not just critical.

Greg

From: Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**
Subject: Spencer Michels interviews
Date: September 21, 2015 at 12:27 AM America/Los_Angeles
To: Amy Meyer a7w2m@**(b) (6)**, Neal Desai ndesai@npca.org, Becky Evans
rebecae@**(b) (6)**, cmargulis@goldengateaudubon.org



CONFIDENTIAL Dear All: I spoke with Spencer Michels, who is producing the PBS News Hour story on Golden Gate dog mgt. He told me his interview line up is Chris Lehnertz, Amy Meyer, Cindy Margulis, Sally Stephens of SF Dog and Save Our Recreation, Huey Johnson, speaking on behalf of dog walkers in general, and maybe Martha Walters of Crissy Field Dog. Amy, it's interesting he's got Huey on his list; I wanted you to know, in case Spencer's questions attempt to pit you against Huey. Huey seems to mostly reflect the interests of Muir Beach dog walkers - he apparently is connected in some way to Laura Pandapas, a very hysterical Muir Beach voice. Three key points re Muir Beach are: a) there are very high resource values at Muir Beach that need protecting, including shorebirds riparian habitat, and creek biota; b) Muir Beach is relatively small and it would be impossible to allow both an off-leash and a dog-free experience, which is possible at the other areas NPS proposes for regulated off-leash use; c) NPS proposes on-leash on the entire beach, which means visitors could still enjoy the beach with their dogs very close at hand - 'on leash' is not 'no dogs.' Meanwhile, a big thanks to each of you for helping to assure that more than one side is heard from in this overheated issue. Gratefully, Howard

From: Amy Meyer a7w2m@ (b) (6)
Subject: Re: Spencer Michels interviews
Date: September 21, 2015 at 8:39 AM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen (b) (6)



Howard, Thanks for the Huey warning. I told Spencer of his attacks on the Conservancy but that is not likely to come up here. And thanks for the specific Muir Beach values. This is a national program and I hope Spencer sticks to the broader issues. Amy On Sep 21, 2015, at 12:27 AM, Howard Levitt and Wendy Scheffers wrote: > CONFIDENTIAL > Dear All: > I spoke with Spencer Michels, who is producing the PBS News Hour story on Golden Gate dog mgt. He told me his interview line up is Chris Lehnertz, Amy Meyer, Cindy Margulis, Sally Stephens of SF Dog and Save Our Recreation, Huey Johnson, speaking on behalf of dog walkers in general, and maybe Martha Walters of Crissy Field Dog. Amy, it's interesting he's got Huey on his list; I wanted you to know, in case Spencer's questions attempt to pit you against Huey. > Huey seems to mostly reflect the interests of Muir Beach dog walkers - he apparently is connected in some way to Laura Pandapas, a very hysterical Muir Beach voice. Three key points re Muir Beach are: a) there are very high resource values at Muir Beach that need protecting, including shorebirds riparian habitat, and creek biota; b) Muir Beach is relatively small and it would be impossible to allow both an off-leash and a dog-free experience, which is possible at the other areas NPS proposes for regulated off-leash use; c) NPS proposes on-leash on the entire beach, which means visitors could still enjoy the beach with their dogs very close at hand - 'on leash' is not 'no dogs.' > Meanwhile, a big thanks to each of you for helping to assure that more than one side is heard from in this overheated issue. > Gratefully, > Howard >

From: [Amy Meyer](#)
To: [Howard Levitt and Wendy Scheffers](#); [Howard Levitt](#)
Subject: What's going on with Huey?
Date: Sunday, May 04, 2014 10:59:37 AM

Dear Howard,

Greg Moore just sent this nasty screed by Huey against the Conservancy. I am trying to get my arms around what is going on and am working on what I can do to help.

Do you have the article electronically that Peter Fimrite did last week? I want to see it for context. Probably that has to wait until tomorrow, but please send it to me as soon as you can.

Thanks,
Amy

Marin Voice: Keep recreation in GGNRA

By Huey D. Johnson
Guest op-ed column

Posted: 05/03/2014 06:45:00 PM PDT

SAN FRANCISCO is being highlighted nationally this year with 600 showings on the nation's TV stations of the lovely film, "Rebels with a Cause."

Produced by Santa Rosa's KCRB and local filmmakers Nancy Kelly and Kenji Yamamoto, the documentary tells the story of the struggle to establish the Golden Gate National Recreation Area through the dreams of honorable politicians and the fast-moving land purchases made by small nonprofits that make up the GGNRA today.

That now-preserved recreation landscape includes 40 miles of seashore landscape reaching from Bolinas in the north, across the Golden Gate Bridge, to San Mateo County in the south. Its history goes back to post-World War II, when with the help of a cooperative Congress the federal government sought to ease urban pressure by providing recreation. Under Chairman Laurance Rockefeller, the Outdoor Recreation Review Commission hired hundreds of experts to study how recreation could improve our stressful urban condition.

Results included establishment of the Land and Water Conservation Fund. I recall the fund provided \$113 million. Without it there wouldn't be a GGNRA.

The GGNRA is intended especially for workers and retirees, those living in small apartments with no backyards and no place to walk their dogs. In light of the source and purpose of the LWCF money, the current political maneuvering to end dog walking is absurd. Owners can train, control and pick up after dogs. And there are already clear rules in place with respect to pets in the GGNRA that need to be enforced and supported.

As happens, a nonprofit Golden Gate National Park Conservancy has emerged that wants to limit public use of the GGNRA. This was never the intent or the purpose of the GGNRA. The principal activity of the national parks advocacy group is fundraising, and wealthy donors who are led to believe they are giving to an environmental cause have donated millions of dollars that is given to government.

This is a mistake.

Such groups have wonderful promise as a way of providing volunteers to assist GGNRA needs, but raising money for government isn't sensible. They are overdue in checking out the British National Trust, or the Friend of Austria's Vienna Woods. These two are marvelously successful and they don't send money to government.

Meanwhile, as the parks conservancy skims millions of dollars from San Francisco regional environmental giving, important environmental nonprofits are starving trying to compete with it to do their more important work. It's the efforts of Earth Justice, 350.org and the Sierra Club that are doing the most to fulfill the dreams of the first Earth Day.

We can't afford to let something like an attempt to ban dogs or restrict access in the GGNRA distract us from the true environmental issues of our day — climate change, fracking, water scarcity — that deserve the vision and leadership of the Bay Area.

True environmental leadership must remain our most important legacy.

We know that the role the GGNRA plays in our regional health and identity is unparalleled. We are obligated to honor its origins, protect its multiple uses, provide a place for hikers, bikers, dogs and kids and show the rest of the country why we deserve to have its bounty so close at hand.

Huey D. Johnson of Mill Valley is the founder of Resource Renewal Institute, a non-profit organization that deals with environmental sustainability. As director of the Nature Conservancy, he helped save the Marin Headlands from development. He was also the founder of the Trust for Public Land and served as secretary of resources during Gov. Jerry Brown's first term.

From: [Howard Levitt and Wendy Scheffers](#)
To: [frank and diane dean](#)
Subject: Yes!
Date: Sunday, May 01, 2011 7:38:33 AM

Hi Frank:

At last, the Chronicle piece we've been waiting for! Today's editorial will help change the equation for us with the elected officials. Although it seldom happens these days, in this case the high road was the right road for us.

Walk with Mark Farrell went well yesterday - but I think he will still try to play the deal maker. He posed all sorts of frinstances like, "how about you split East Beach down the middle?" We couldn't have had a better day to tour; Crissy was packed with thousands of users, several dogs were off leash in the WPA, and overall the balance in our prescription at Crissy seemed pretty evident.

I have an idea - what if we offer onsite tours of Crissy, OB and Funston for the interested public in a couple of weeks? Nothing shows the balance like seeing the situation on the ground.

Wendy and I will be at Crissy today at Noon for the Crissy 10th anniversary Conservancy's Members Day.

See you tomorrow.

Howard



Proposed Rule for Dog Management Frequently Asked Questions

1. Why has GGNRA developed a Dog Management Plan and Proposed Rule?

Since GGNRA was established in 1972, annual visitation to the park (including Muir Woods and Fort Point) has grown elevenfold – from around 1.4 million to over 17.5 million visitors. At the same time, dog walking in the park has increased dramatically. GGNRA must establish a Dog Management Plan that addresses current problems and looks to the future. While many people who walk dogs do an excellent job controlling their dogs, and picking up after their dogs (and even after other park visitors) there are too many conflicts that involve dogs, including serious injuries to park visitors and employees. The Proposed Rule would improve the conditions that support the wide variety of recreational activities that park visitors pursue, in a safer and cleaner environment, while protecting natural and cultural resources for future generations.

2. What is a “Rule” for dog management?

A Rule is the specific federal regulation that governs an activity in a national park. In the case of dog management, the Proposed Rule reflects in draft only the NPS preferred alternative from the Draft Dog Management Plan/Supplemental Environmental Impact Statement (SEIS) that was reviewed by the public in 2013/14. The Proposed Rule describes how the preferred alternative would be implemented if selected.

3. What is included in the Proposed Rule?

The Proposed Rule identifies those places in the park where people would be able to enjoy the park with their dogs – both on and off-leash - and those places where dogs would not be allowed. It also defines terms like “voice control” that are essential to dog management, and describes the responsibilities of dog owners to manage their dogs effectively. The Proposed Rule also describes commercial dog walking opportunities and requirements.

4. What was the Preferred Alternative in the SEIS, which the Proposed Rule reflects?

The 2013/14 SEIS considered and evaluated a range of alternatives for the management of dogs in the park, and identified an NPS preferred alternative (Alternative F) that would best meet the objectives for managing dogs:

- Provide a variety of visitor experiences
- Preserve and protect natural and cultural resources and natural processes
- Improve visitor and employee safety
- Reduce visitor conflicts
- Maintain park resources and values for future generations.
- Provide clear, enforceable rules for dog management

5. Have there been any changes made to the SEIS preferred alternative that appear in the Proposed Rule?

- Addition of conditions for walking four to six dogs under an NPS permit
- Changes to two Voice and Sight Control Areas (formerly known as Regulated Off Leash Areas, ROLAs) - Crissy Airfield and upper Fort Funston
- Addition of four new trail segments for on-leash dog walking (Rancho Corral de Tierra)
- Addition of clarifying definitions
- A few minor adjustments to dog walking areas based on new information or public suggestions
- Clarified considerations for the Monitoring and Management Program
- Updated and corrected trail and road names. In some cases, these are different from the names used in the SEIS. These trail and road name changes have no operational impact.
- Two scenarios under which dog walking opportunities may be expanded, including addition of authority for the superintendent to determine whether to allow dogs on-leash where the park adds new trails within the 22 locations

6. In the Proposed Rule, how much of the park would be available to people with dogs?

Under the Proposed Rule the park would be the most dog-friendly of any of the 410 units of National Park system. Significantly, GGNRA would be the only NPS unit that would permit dog walking off-leash. Of the 8.7 miles of beaches, about 2.7 miles (31%) would be available for dog walkers, and 2.3 miles (over 26%) would be available for off-leash dog use. Of the 137 miles of trails addressed in the SEIS, approximately 46 miles (about 34%), will be available for dog walking.

7. Where can I walk my dog off-leash?

Under the Proposed Rule, off-leash dog walking would be permitted in seven areas: Rodeo Beach; Fort Mason; Crissy Field (two areas); Ocean Beach; and Fort Funston (two areas).

8. What about dog access at two of the most popular locations - Fort Funston and Crissy Field?

At these two locations, the area available for dog use is substantial. At Fort Funston, of the total of 180 acres (excluding the 10 acre Bank Swallow Protection Area), approximately 95 acres are steep cliff or dense vegetation, and are not accessible for any use. Of the remaining 85 acres, the Proposed Plan includes 35 acres (41%) for off-leash dog use. In addition, most of the trails and parking lots would be available for dogs on leash. At Crissy Field, dogs will be permitted in most places. Approximately 30% of the airfield, and 40% of the beach front mileage would be available for off-leash dog use. In addition, the rest of the airfield, the East Beach picnic area, and nearly all of the trails would be open to dogs on-leash.

9. Why does the Proposed Rule limit dogs to a maximum of six dogs per dog walker when the City of San Francisco permits up to eight dogs?

A maximum of six dogs per dog walker is the standard limit on public lands throughout the country, and in all jurisdictions surrounding the park, except the City of San Francisco. During the multi-stakeholder Negotiated Rulemaking process in 2006/07, there was a consensus that six dogs is a reasonable maximum. When the matter was being considered by the San Francisco Board of Supervisors in 2013, the San Francisco Animal Care and Control Department advised a six dog limit; the Supervisors decided upon a maximum of eight dogs. GGNRA currently has an interim compendium limit on six dogs and this limit has been very well received by the commercial dog walking community.

10. What is GGNRA doing to protect wildlife and native plants from dogs?

The park considered impacts to wildlife and native vegetation in designating areas where dogs would be permitted. Areas with known or probable sensitive wildlife or plant species were designated as off limits to dogs or for dogs only on-leash. Additionally, trails away from developed areas were designated as dog-free areas because these areas have the highest prevalence of wildlife and native plant species, and are more susceptible to disturbance and damage by dogs on or off-leash. Once a dog rule is implemented, regulations related to the impact of dog use on wildlife and plants would be monitored for compliance.

11. Would access to GGNRA recreational uses be reduced?

Visitors enjoy dozens of different recreational activities in GGNRA, and well-managed dog walking can be a healthy, enjoyable and appropriate experience in many areas of the park. The Proposed Rule will not eliminate any recreational activities. For those who avoid or do not visit an area of the park because they want a dog-free experience, the rule could increase recreational access. For those who want maximum off-leash dog walking, the rule would reduce the area available for that use. Overall, the Proposed Rule would not diminish the recreation opportunities for the more than 17 million annual visitors who use the park for a countless variety of recreation experiences.



12. What is the Monitoring Based Management Program?

All areas open to dog walking would be subject to a Monitoring and Management Program. This program would include regular monitoring and recording of compliance with the Final Rule and other regulations related to potential impacts of dog use of the park. If the Superintendent determines the level of compliance to be approaching unacceptable levels, then primary management action would be taken to address noncompliance. Examples include additional outreach and education, increased area-specific enforcement, fine increases, and additional barriers to increase separation of areas. If primary management actions do not address the problem, secondary actions would be taken, such as short or long term closure of some areas to dog walking, additional use restrictions, or increased buffer zones. The park will involve the public in developing and implementing the Monitoring and Management Program, through workshops and recurring meetings with the public.

13. What are the steps in the overall dog management planning and rulemaking process? Where does the Proposed Rule fit in?

- a. Notice of Proposed Rulemaking (2002)
- b. Scoping for development of a dog management plan – included an Negotiated Rulemaking process (2002-2006)
- c. Release and comment period for Draft Dog Management Plan/Environmental Impact Statement – DEIS – with six alternatives (2011)
- d. Release and comment for Draft Dog Management Plan/Supplemental Environmental Impact Statement – SEIS – with NPS preferred alternative (2013-2014)
- e. **CURRENT STEP:** Release and comment on Proposed Rule based on SEIS preferred alternative (Winter 2016)
- f. Review of comments on SEIS and Proposed Rule (Summer 2016)
- g. Release of Final Environmental Impact Statement – FEIS – incorporating public comments and identifying a final preferred alternative (Fall 2016)
- h. Record of Decision issued that selects the preferred alternative, pending adoption of the final rule (Fall 2016/Winter 2017)
- i. Final Rule published in Federal Register that reflects the selected alternative; the rule may be implemented 30 days thereafter (Winter 2017)
- j. NPS will initiate a public outreach and education effort to increase understanding of and compliance with the new rule.

14. Will there be public meetings on the Proposed Rule? Will there be an opportunity for attendees to make a public statement during the meetings?

There will be six public informational meetings – two each in Marin County, San Francisco, and San Mateo County – during the 60-day public comment period. The dates and times of these meetings will be publicized well in advance and in a variety of ways. At these meetings, there will be opportunities for the public to learn about the content of the Proposed Rule and ask questions, speak directly one-one-one to park staff, and briefly speak publicly to the assembled group if desired. For comments to be officially submitted, they must be submitted either directly to the superintendent by mail, or through regulations.gov as noted in #14 below.

15. If I can't attend one of the public meetings, will I have a chance to hear a presentation on the content of the Proposed Rule?

Yes. We will post a video recording of one of the public information meetings and the subsequent question and answer session on our website during the comment period. Park staff will also answer phone and email questions from individuals throughout the public review period.

16. Where can the public get the Proposed Rule and how can comments be submitted?

The Proposed Rule is available for review and comment for 60 days, from February 24-April 23, 2016. Visit regulations.gov (search, "RIN 1024-AE16") to review and comment on the Proposed Rule online. To have a copy of the Proposed Rule mailed to you, please call 415-561-4728. Copies of the Proposed Rule may also be picked up in person at Golden Gate National Recreation Area headquarters, Building 201, Upper Fort Mason, San Francisco (Bay and Franklin Streets).

Comments may be submitted:

- o Online at regulations.gov (search "RIN 1024-AE16")
- o By mailing comments to Christine Lehnertz, Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123-0022.

Comments will be accepted only as described above, and will not be accepted by fax, email, or in any other way than those specified above. Bulk comments in any format (hard copy or electronic



Background

Authority and Jurisdiction.

The National Park Service (NPS) manages the Golden Gate National Recreation Area (GGNRA or park) as a unit of the National Park System. Units of the National Park System are managed under the statutes commonly known as the National Park Service Organic Act of 1916, the General Authorities Act of 1970, and the Redwood Amendments of 1978 which amended the General Authorities Act (codified at 54 U.S.C. 100101 *et. seq.*). As explained in NPS Management Policies 2006, these interrelated authorities express the fundamental purpose of the National Park System which is to conserve park resources and values and to provide for visitor enjoyment of these resources and values. The mandate to protect park resources and values is complemented by a statutory prohibition on the impairment of park resources and values. To avoid impairment, park managers are directed to seek ways to avoid and minimize adverse impacts on park resources and values to the greatest extent practicable. Where there are conflicts between conserving resources and values and providing for enjoyment of them, conservation is to be the predominant goal. To aid in the regulation of visitor activities within units of the National Park System, 54 U.S.C. §100751(a) authorizes the Secretary of the Interior, acting through the NPS, to “prescribe such regulations as the Secretary considers necessary or proper for the use and management of System units.”

An additional source of legal authority for the management of GGNRA derives from the park’s enabling legislation, which was enacted in 1972 when Congress created the GGNRA. The enabling legislation states that the GGNRA was established “to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural historic, scenic, and recreational values, and in order to provide for the maintenance of

needed recreational open space necessary to urban environment and planning” (16 U.S.C. § 460bb). The enabling act also directs the Secretary of the Interior, acting through the NPS, to “utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management,” and requires the NPS to “preserve the recreation area, 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).



Communications Plan

Public Review of Proposed Rule for Dog Management

**Golden Gate
National
Recreation Area**

**February 21, 2016
Version 5**

Communications Plan
Public Review of Proposed Rule for
Dog Management at
Golden Gate National Recreation Area

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Purpose and Goals of the Communication Plan

Purpose

For over 13 years, NPS had been working to develop a special rule for dog management at Golden Gate National Recreation Area (GGNRA). This process has engendered high interest among local dog walking advocates, environmental organizations, various user constituencies, and federal, state and local elected officials. California and San Francisco Bay Area media interest in this issue is high.

This Communication Plan provides information about the process and timing of activities related to release of the Proposed Rule for Dog Management for Golden Gate National Recreation Area. It also provides key messages for NPS and DOI staff to use in addressing public questions about the Proposed Rule and about dog management in general at Golden Gate National Recreation Area.

Goals

- Ensure that NPS and DOI deliver consistent messaging about a complicated issue
- Identify strategies for elected official, interested stakeholder, media and general public outreach and information
- Be proactive in communicating dog management messages

Media Spokesperson*

Primary media spokesperson for GOGA-specific questions about proposed rule and dog management plan:

Howard Levitt, Director of Communications and Partnerships

Golden Gate National Recreation Area

(415) 561-4730

Howard_levitt@nps.gov

Primary media spokesperson for national policy related to dogs in parks:

Jeff Olson, Public Affairs Specialist

National Park Service, Washington Office of Public Affairs

202.208.6843

jeffrey_olson@nps.gov

*The individuals identified above will be the primary spokespeople, and the only ones talking to the media. Field staff will be provided a card with some key messages/statements for use with the public (Appendix 4), and will defer questions beyond this back to the lead spokesperson.

Project In Brief

- The number of visitors to GGNRA who are accompanied by dogs has increased significantly over the past decade, and as a result there are an escalating number of conflicts between park users, between dogs, between dogs and visitors, uncontrolled dogs and wildlife, and dog owners/walkers and law enforcement.
- The GGNRA currently operates under a 1979 pet policy which is not consistent with NPS's nationwide regulation regarding pets. In 2005, the U.S. District Court ruled that the GGNRA may not enforce the existing NPS nationwide regulation (36 CFR 2.15) to the degree that it conflicts with the 1979 policy, and must instead follow the 1979 policy until the park completes NEPA and a rulemaking process to make any changes to areas covered by the 1979 policy. The GGNRA issued a DEIS and a subsequent SEIS that proposed alternative approaches for dog management in 22 park locations. These alternatives include adopting the national rule or promulgating a special regulation that would relax the national rule in some areas of GGNRA. The NEPA process and the associated rulemaking process are ongoing.
- The Proposed Rule for Dog Management in Golden Gate National Recreation Area, which would reflect the NPS preferred alternative from the Supplemental Environmental Impact Statement (SEIS) with a few minor modifications, is being released in January 2016 for 60- day public review and comment.
- The SEIS was open for public review from September 6, 2013 through February 18, 2014. It outlined the preferred alternative and five alternatives for dog walking management in 22 distinct locations within Golden

Gate National Recreation Area. It included seven areas where regulated off-leash dog walking could occur, as well as areas for dogs on-leash, and places where dogs would not be permitted.

- Six public information meetings and several additional informal informational briefings will be scheduled during the comment period on the Proposed Rule in local communities in each of the three counties of the park.
- Briefings for neighboring city and county agencies and key stakeholders will also be held.
- A comprehensive media outreach campaign will be undertaken to answer any questions and seek broad public comment.
- Key elected officials will be briefed before and after the release of the Proposed Rule.

Talking Points

Key Talking Points

- The Bay Area population has increased over 40% since the 1979 Pet Policy was put in place, and is expected to grow another 30% by the year 2040 - reaching a population of 9.3 million people. The GGNRA must complete a dog management plan for the future, to protect natural and cultural resources, provide safe, clean and fun recreational experiences for all visitors, and preserve our national heritage for future generations
- GGNRA is home to hundreds of different recreational activities, and well managed dog walking can be a healthy, enjoyable and appropriate experience in many areas of the park.
- Unfortunately, GGNRA has too many conflicts that involve dogs. There are about 300 law enforcement cases every year related to dog issues. In the past few months alone, there have been several very serious dog attacks. In one, a visitor had significant injuries to her calf; in another, a visitor had to undergo painful rabies shots following an attack by two dogs whose owner fled the scene.
- Dog conflicts in GGNRA also include dogs chasing and/or killing wildlife, horses bitten by dogs, dog fights, dogs lost over cliffs or trapped by rising seas, dog abuse, and even visitor-on-visitor violence due to dog-related conflicts.
- Through the Proposed Rule, and working with communities, stakeholders, and elected officials, GGNRA can create safer park visits that meet expectations for all visitors. As one of the public comments on the SEIS reflected, "Dedicating locations for off-leash, on-leash, and dog-free zones gives us the opportunity to experience the park on our terms."
- Under the Proposed Rule, GGNRA would remain the most dog-friendly unit of the national park system, and the only national park in the United States to allow off-leash voice and site control locations for dog walking. There would be seven areas for off-leash dog walking, and dozens more for on-leash use.
- Over 30% of park beach mileage would be available for dog walking, most of it off-leash, and nearly 35% of the park's total miles of trails would be open for on-leash dog walking.
- Importantly, GGNRA is also home to vital natural and cultural resources. Established in part for its critical contiguous habitat, the park is home to 3,968 plant and animal species - including 37 federally listed threatened or endangered species. The Proposed Rule will also help to reduce potential resource impacts that may be associated with dog use and help steward these precious resources for the future.
- The Proposed Rule is not a final decision. Comments on the Proposed Rule, along with those received on the SEIS, will help shape the final dog management plan and final rule, expected later this year.
- And yes, there are more dogs in San Francisco than children – which also reflects nationwide demographics. It's the same across the country. The Humane Society of the United States notes that in 2015 there were an estimated 78 million dogs in America, and the U.S. Census Bureau reported in 2015 that 74 million children were living in the U.S.

Detailed Talking Points

About the Proposed Rule:

- The Proposed Rule is based on the elements of the preferred alternative within the Draft Dog Management Plan/Supplemental Environmental Impact Statement (SEIS) that relate to where, when and under what circumstances dogs may be walked in the park. The Proposed Rule would amend the park's special regulations to designate 22 locations for dog walking. The Proposed rule would govern where and how people would be able to enjoy the park with their dogs – on and off-leash – as well as provides parameters for responsible dog walking within the park, and where to enjoy the park as a dog-free visit.
- The Proposed Rule would establish seven areas within the park for off-leash dog walking, including the most popular dog walking area in the park – Fort Funston. The Proposed Rule would allow dogs on most park beaches, retain many trails in the park for on-leash dog use, and allow for commercial dog walking in some areas. It would also assist the NPS in meeting its mandate to protect resources for the future.
- The Proposed Rule is unique to Golden Gate National Recreation Area. The national regulation for pets in national parks is very protective of our nation's natural and cultural resources, and allows parks to restrict dogs to limited areas of parks. The national regulation does not allow off-leash dog walking in any National Park Service units. This proposed rule would allow for exceptions to the national regulation in certain areas of GGNRA.

Benefits of the draft dog management plan/proposed rule:

- The draft dog management plan, including the associated proposed rule and education and monitoring program, protects endangered species and their habitats, allows for hiking and other experiences that are dog-free, and provides locations where children, elders, and people with disabilities can experience the park free from dogs.
- Under the Proposed Rule, dog walking would be allowed along nearly one-third of the park's beaches, mostly off-leash. In addition, one-third of the park's trail mileage would be available for on-leash dog walking.
- If implemented, the dog management plan and associated rule would reduce conflicts between different groups of park users. It would allow visitors to select an experience that suits them, give everyone a national park experience, provide a safer place for children, protect natural and historic resources, clarify rules and delineate areas for dog use, and provide guidelines for better enforcement of dog walking rules.
- GGNRA would remain the most dog-friendly park in the National Park System while still protecting the natural and cultural resources of the park. Implementation of the proposed rule would ensure the continuation of the wide variety of recreational activities park visitors engage in, but in a safer, healthier, and cleaner environment.
- The GGNRA dog management planning process acknowledges the history of dog walking in the park, recognizes well-managed dog walking as a healthy activity, and designates the only opportunities for off-leash dog walking in any of the 410 units of the national park system.
- The process that has led to the development of a Draft Dog Management Plan and associated Proposed Rule has included a tremendous amount of public dialogue, including numerous hearings, meetings, and briefings held since 2002.

About Golden Gate National Recreation Area:

- When Golden Gate National Recreation Area was established in 1972, it inherited a number of areas which had seen off-leash dog use prior to the establishment of the park. As park visitation has grown over the years, and the number of dogs has increased substantially, the number of conflicts has increased between various user groups, many of whom want to enjoy the same areas of the park for different reasons.

- GGNRA is the second most visited park in the national park system, and, being in a major urban area, hosts a wide variety of recreational uses. As such, it is the only park in the national park system with areas where dogs are allowed to be off-leash. It also provides tremendous opportunities for more natural experiences away from developed areas, where dogs are not allowed.
- Our understanding of the park's sensitive resources has increased since 1979 when the current pet policy was implemented. For example, we now know the park contains more rare and threatened species than all but two other of the nation's national parks. This knowledge helped NPS determine which areas required protection and which areas could be made available for dog walking

Briefing Statement

Bureau: National Park Service
Issue: Proposed Rule for Dog Management
Member: Sen. Dianne Feinstein (D-CA) , Sen. Barbara Boxer (D-CA) , Rep. Nancy Pelosi (D-CA) , Rep. Jackie Speier (D-CA) , Rep. Jared Huffman(D-CA)
Park: Golden Gate National Recreation Area

Key Points:

- Federal regulation (36 CFR 2.15) requires that all pets, where allowed in national parks, be crated, caged or restrained.
- NPS has developed a proposed rule as an exception to the servicewide regulation, which specifies where and under what conditions dogs may be allowed in the park, including off leash. The proposed rule would implement the regulatory aspects of the Preferred Alternative in the Dog Management Plan SEIS.
- The purpose of the park's Dog Management Plan and the associated proposed rule is to provide a clear, enforceable implementation plan for dog walking in appropriate areas of the park, in a manner that protects park resources and values, and provides an enjoyable, national park experience for all members of the public.

Background:

- When the park was established in 1972, it inherited a number of areas which had seen off-leash dog use prior to the establishment of the park.
- The NPS manages dog walking in parts of the park under a 1979 Pet Policy. The rest of the park is managed under the servicewide pet regulation. The 1979 Pet Policy is not consistent with the servicewide regulation, and NPS rescinded the policy in 2001. A lawsuit challenging the rescission resulted in a ruling by the U.S. District Court for Northern California directing the park to follow the 1979 policy until the park could complete a formal rulemaking process.
- A Draft EIS was released in 2011 for a more than four month public review process. A Supplemental EIS (SEIS) was released in 2013 for over five months of public comment. The preferred alternative proposed to allow regulated off-leash dog walking in seven park areas. Adjacent state parks do not allow off-leash dog walking.
- The public planning process has been in underway for over 13 years.
- There are many dog walkers who are opponents of this plan, despite the plan offering approximately one-third of the park's major (non-swimming) beaches and one-third of the trails for dog walking. The proposed rule eliminates off-leash use on all trails, except in the most popular dog walking area at Fort Funston.
- A variety of stakeholders have been active in this issue for decades, in particular the advocates for off-leash dog walking. Several groups have had meetings with DOI decision-makers, local elected officials and federal lawmakers. They will continue to be active and vocal during the upcoming public comment period.
- Stakeholders also include wildlife protection groups, disability access interests, family and children's rights groups, on-leash dog walkers and many others who recreate in the park.

Current Status:

- The proposed rule is based on the preferred alternative described in the SEIS with minor modifications. The SEIS covers 22 distinct park locations and presents a range of alternatives for dog walking in these areas, including off-leash use. Dog walking in the park outside these 22 locations would continue to be regulated under the National Park System-wide pet regulation.
- In general, changes from the SEIS include: modified restrictions on walking four-to-six dogs under an NPS permit; adjustments to two voice and sight control/off-leash areas (i.e. Crissy Airfield and Fort Funston); the addition of four new trail segments for on-leash dog walking in San Mateo County and the elimination of one trail (Drown Fire Road) in Marin County for dog walking; clarifying definitions; and clarified Monitoring and Management Program actions.
- The park is submitting the proposed rule for surnaming and signature and expects to release a Notice of Proposed Rulemaking in mid-late February 2016 for a 60-day public comment period. The Final EIS would be released in Summer or Fall 2016, and a Record of Decision and special regulation in Fall 2016.

Contact Person: Chris Lehnertz, 415-561-4720

Last Updated: February 1, 2015

Schedule of Key Events

Task:	Implemented By:	Implemented
Prior to release of documents		
Email blast to stakeholders alerting them to tentative schedule of release and upcoming meetings on TBD.	GOGA: Howard Levitt	November 3, 2015
Schedule and book Noticed Informational Meetings	GOGA: Howard Levitt	February 2016
Prepare item for DOI Weekly Report	GOGA: Howard Levitt, Alex Picavet, or Adrienne Freeman	February 5, 2016
STAFF/Internal Briefings—including USPP, Presidio Trust, and Conservancy staff	GOGA: Chris Lehnertz, Howard Levitt	February 16-18, 2016
Prepare talking points for phone calls, informational briefings	GOGA: Howard Levitt, Chris Lehnertz	February 16, 2016
Prepare general press material Prepare Op-Ed for publication post-release	GOGA: Howard Levitt, Adrienne Freeman, Alex Picavet,	February 16, 2016
Submit Communications Plan V5 for PWR and WASO review	GOGA: Chris Lehnertz	February 21, 2016
Newsletter for Proposed Rule public review emailed	GOGA: Chuck Plummer (via Constant Contact)	February 22, 2016
Emails or personal or phone call briefings – coordinated among park, PWR, and WASO : <ul style="list-style-type: none"> • Congressional Washington & local staff from CA • Delegations – Pelosi, Speier, Huffman, Boxer, Feinstein • Key Stakeholders and Agency representatives , including SF Mayor Ed Lee • News Media conf call 	GOGA: Howard Levitt; PWR: Stephanie Burkhart and Craig Dalby on Washington briefings Alex Picavet- Media	February 22, 2016
GOGA Press Release #1 issued	GOGA: Alex Picavet	Feb 22, 2016 after 5:00 PM Pacific
NPS Notice of Availability (NOA) submitted to Federal Register (for pre-publication in Federal Register Reading Room on date)	GOGA: Mike Savidge EQD: Michael Edwards	February 23, 2016
Day of document release (February 24, 2016)		
Proposed Rule Published in Federal Register; this formally begins public comment period	WASO: Russ Wilson (Office of Regulations)	1:00 PM Pacific
Proposed Rule made available via Regulations.gov and the Federal Register	WASO: Russ Wilson	1:00 PM Pacific
GOGA press release (# 1), social media release, and publish on websites	GOGA: Alex Picavet, Howard Levitt, PWR: Craig Dalby	1:00 PM Pacific
GOGA Dog Management planning web page update goes live	GOGA: Craig Glassner, Chuck Plummer	9:00 AM Pacific
Place windmaster and A-frame posters and post visitor centers and update when Noticed Meetings are set	SPUG, Maintenance and LE	By 2:00 PM Pacific

Schedule of Key Events (continued)

Task:	Implemented By:	Implemented On:
Personal Calls as needed to PT, Parks Conservancy, Mayor Ed Lee's office, SF Rec and Park, etc.	GOGA: Chris Lehnertz, Howard Levitt	By 1:00 PM Pacific
Submit Op/Ed pieces to San Francisco Chronicle, etc.	GOGA: Howard Levitt, Alex Picavet	ASAP after release, but after Editorial Boards
Three Weeks After release		
Posters/ other materials for public meetings	EQD: Michael Edwards, GOGA: Mike Savidge, Howard Levitt	March 14, 2016
GOGA press release (#2) and social media released tweet and publish on websites about noticed public informational meetings	GOGA: Alex Picavet, Howard Levitt	March 17, 2016
One Month After Release		
Major stakeholder/ County Supervisors meetings	GOGA: Chris Lehnertz, Howard Levitt, Mike Savidge EQD: Michael Edwards	Date, time, and location TBD
Noticed Public meeting – Montara, Farallone View School	GOGA, with assistance from EQD	March 22, 6-8PM
Noticed Public meeting – Sausalito, Bay Model	GOGA, with assistance from EQD	March 23, 6-8PM
Noticed Public meeting – San Francisco, Fort Mason Center Gallery 308	GOGA, with assistance from EQD	March 24, 6-8
Noticed Public meeting – San Francisco, Golden Gate Park	GOGA, with assistance from EQD & PWR	March 29 6-8PM
Noticed Public meeting – Marin County	GOGA, with assistance from PWR	March 30, 6-8 PM
Noticed Public meeting – Pacifica, Ingrid B. Lacy School	GOGA, with assistance from PWR	March 31, 6-8PM
Other Meetings During Public Review Period		
GOGA Business Management Partners	GOGA: Business Management; Public	ASAP after release
Park staff, volunteers, and Conservancy staff & Board update briefing	GOGA: Howard Levitt, Chris Lehnertz, Mike	By March 10, 2016
Editorial boards and individual news media (traditional and web-based)	GOGA: Public Affairs, Chris Lehnertz	Seeking editorial board dates during week of February 29, 2016 first week
Community/organization Informational Briefings	GOGA: Public Affairs, extended team	As requested

Golden Gate National Recreation Area

News Release

Date: February 22, 2016

Contact: Howard Levitt, 415 561-4730

For Immediate Release

Golden Gate National Recreation Area Releases Proposed Rule for Dog Management

*Action Opens 60-day Public Review and Comment Period
Public Meetings Planned in San Mateo, San Francisco, Marin Counties*

San Francisco –The Proposed Rule for Dog Management in Golden Gate National Recreation Area (GGNRA) will be available for public inspection on Tuesday, February 23, 2016 at [regulations.gov](http://www.regulations.gov) (search "RIN 1024-AE16"), and will be open for a 60-day public comment on February 24 through April 23, 2016. If implemented, the rule would ensure the protection of the park's natural and cultural resources and continue to provide recreational opportunities for a wide variety of park users.

The Proposed Rule would amend the park's special regulation by designating 22 locations for dog walking in the GGNRA. It is based on the Preferred Alternative described in the Draft Dog Management Plan/Supplemental Environmental Impact Statement (SEIS) that was reviewed and commented on by the public in 2013/14. It would designate where and how people would be able to enjoy the park with their dogs – both on and off-leash – as well as places that would be dog free. It would define terms like "voice and sight control" that are essential to dog management.

GGNRA recognizes well-managed dog walking as a healthy and popular way to enjoy park lands. Under the Proposed Rule, off-leash dog walking would be allowed in seven areas in five different park locations including Fort Funston, the most popular dog walking area in the park. Dog walking would be allowed on almost one-third of the park's beach mileage, mostly off-leash, and one-third of the park's trail mileage would be available for visitors to walk their dogs on-leash. There would also be dog free beach and picnic area options. Specific areas would be identified for commercial dog walking.

"Under the Proposed Rule, the GGNRA would remain the most dog-friendly national park in the United States," said GGNRA Superintendent Christine Lehnertz. "This rule would ensure the protection of the park's natural and cultural resources and continue to provide recreational opportunities for a wide variety of park users while improving the safety of visitors, employees, and pets."

The park will hold [public meetings](#) on the Proposed Rule during the 60-day review and comment period, in San Mateo, San Francisco, and Marin counties. Dates and locations will be announced separately.

Comments on the Proposed Rule may be submitted in two ways:

- Online through the Federal Register website: www.regulations.gov (search: "RIN 1024-AE16").
- By mail addressed to the Superintendent, GGNRA, Dog Management Proposed Rule, Building 201, Fort Mason, San Francisco, CA, 94123.

Comments cannot be accepted over the phone, by fax, or email. Bulk comments in any format submitted on behalf of others will not be accepted. An electronic copy of the proposed rule, including maps of the areas subject to the rule, is available on www.regulations.gov (search: "RIN 1024-AE16"). Hard copies of the rule can be requested by calling 415-561-4728 or by email at goga_dogmgt@nps.gov.

The Proposed Rule is an important step in the process to develop a federal rule on dog management in the GGNRA. The National Park Service expects to have a final environmental impact statement, a record of decision, and a final regulation in place by late 2016.

Golden Gate National Recreation Area

News Release

Date: March 14, 2016

Contact: Howard Levitt, 415 561-4730

For Immediate Release

Golden Gate National Recreation Area to Hold Public Meetings on Proposed Rule for Dog Walking

San Francisco –Six informational public meetings have been scheduled on a proposed rule for dog management in Golden Gate National Recreation Area. The meetings will provide the public an opportunity to learn more about the proposed rule and provide input during a 60-day public comment period that opened February 23, 2016. Additional informational meetings may be held.

Public meetings are scheduled as follows:

- March 22, San Mateo County, , Farallone View Elementary School, 1100 Le Conte Ave, Montara, CA 94037
- March 23 Marin County, Bay Model, Sausalito, California
- March 24 San Francisco County, Fort Mason Center, [building TBD] San Francisco, CA 94123
- March 29 San Francisco County, Golden Gate Park
- March 30 Marin County, Mill Valley Community Center, 180 Camino Alto, Mill Valley, CA 94941
- March 31 San Mateo County Pacifica, Pacifica Community Center, 540 Crespi Dr, Pacifica, CA 94044
-

Each meeting will run from 6pm to 8pm. Meetings will include a presentation on the proposed rule, opportunities to meet informally with National Park Service (NPS) staff, and an opportunity for participants to present ideas to other meeting participants. One of the meetings will be video-recorded and posted on the dog management website for those who cannot attend a meeting in person.

In addition to these meetings, park staff will provide informational briefings on the proposed rule to interested organizations and community groups. Please call 415-561-4728 for more information.

The proposed rule for dog management describes where and how people would be able to enjoy the park with their dogs – on- and off-leash. It also sets parameters for responsible dog walking within the park.

The Proposed Rule would apply to 22 locations within the park and would designate areas within these locations for on-leash and off-leash dog walking. In these 22 locations, places that are not designated as open to dogs would be closed to dogs, except for service animals in accordance with National Park Service (NPS) regulations. Dog walking in all other park areas would continue to be regulated under the NPS' system-wide pet regulations which do not permit dogs to be off leash. State, city and county lands within the GGNRA boundary will continue to be subject to the rules of those jurisdictions.

The proposed rule reflects the NPS preferred alternative in the 2013-14 Supplemental Draft Environmental Impact Statement for Dog Management (SEIS). The comment period will be open from February 23, 2016 – April 22, 2016. Comments on the proposed rule may be submitted in two ways:

- Online through the [regulations.gov website](#) (search RIN 1024-AE16)
- By mail addressed to the Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA, 94123.

Comments cannot be accepted over the phone, by fax, or email. Bulk comments in any submitted on behalf of others will not be accepted. An electronic copy of the Proposed Rule, including maps of the areas subject to the rule, is available on the [Federal Register website](#) (search RIN 1024-AE16). You can also request a copy of the Proposed Rule on compact disc or in printed form from: National Park Service- GGNRA, Building 201, Fort Mason, San Francisco, CA, 94123 or by calling 415-561-4728.

Frequently Asked Questions [To accompany public facing documents, press releases, etc.]

Golden Gate National Recreation Area Proposed Rule for Dog Management

1. Why has GGNRA developed a Dog Management Plan and Proposed Rule?

Since GGNRA was established in 1972, annual visitation to the park (including Muir Woods and Fort Point) has grown eleven-fold – from around 1.4 million to over 17.5 million visitors. At the same time, dog walking in the park has increased dramatically. GGNRA must establish a Dog Management Plan that addresses current problems and looks to the future. While many people who walk dogs do an excellent job controlling their dogs, and picking up after their dogs (and even after other park visitors) there are too many conflicts that involve dogs, including serious injuries to park visitors and employees. The Proposed Rule would improve the conditions that support the wide variety of recreational activities that park visitors pursue, in a safer and cleaner environment, while protecting natural and cultural resources for future generations.

2. What is a “Rule” for dog management?

A Rule is the specific federal regulation that governs an activity in a national park. In the case of dog management, the Proposed Rule reflects in draft only the NPS preferred alternative from the Draft Dog Management Plan/Supplemental Environmental Impact Statement (SEIS) that was reviewed by the public in 2013/14. The Proposed Rule describes how the preferred alternative would be implemented if selected.

3. What is included in the Proposed Rule?

The Proposed Rule identifies those places in the park where people would be able to enjoy the park with their dogs – both on and off-leash - and those places where dogs would not be allowed. It also defines terms like “voice control” that are essential to dog management, and describes the responsibilities of dog owners to manage their dogs effectively. The Proposed Rule also describes commercial dog walking opportunities and requirements.

4. What was the Preferred Alternative in the SEIS, which the Proposed Rule reflects?

The 2013/14 SEIS considered and evaluated a range of alternatives for the management of dogs in the park, and identified an NPS preferred alternative (Alternative F) that would best meet the objectives for managing dogs:

- Provide a variety of visitor experiences
- Preserve and protect natural and cultural resources and natural processes
- Improve visitor and employee safety
- Reduce visitor conflicts
- Maintain park resources and values for future generations.
- Provide clear, enforceable rules for dog management

5. Have there been any changes made to the SEIS preferred alternative that appear in the Proposed Rule?

- Addition of conditions for walking four to six dogs under an NPS permit
- Changes to two Voice and Sight Control Areas (formerly known as Regulated Off Leash Areas, ROLAs) - Crissy Airfield and upper Fort Funston
- Addition of four new trail segments for on-leash dog walking (Rancho Corral de Tierra)
- Addition of clarifying definitions
- A few minor adjustments to dog walking areas based on new information or public suggestions
- Clarified considerations for the Monitoring and Management Program
- Updated and corrected trail and road names. In some cases, these are different from the names used in the SEIS. These trail and road name changes have no operational impact.
- Two scenarios under which dog walking opportunities may be expanded, including addition of authority for the superintendent to determine whether to allow dogs on-leash where the park adds *new trails* within the 22 locations

6. In the Proposed Rule, how much of the park would be available to people with dogs?

Under the Proposed Rule the park would be the most dog-friendly of any of the 410 units of National Park system. Significantly, GGNRA would be the only NPS unit that would permit dog walking off-leash. Of the 8.7

miles of beaches, about 2.7 miles (31%) would be available for dog walkers, and 2.3 miles (over 26%) would be available for off-leash dog use. Of the 137 miles of trails addressed in the SEIS, approximately 46 miles (about 34%), will be available for dog walking.

7. Where can I walk my dog off-leash?

Under the Proposed Rule, off-leash dog walking would be permitted in seven areas: Rodeo Beach; Fort Mason; Crissy Field (two areas); Ocean Beach; and Fort Funston (two areas).

8. What about dog access at two of the most popular locations - Fort Funston and Crissy Field?

At these two locations, the area available for dog use is substantial. At Fort Funston, of the total of 180 acres (excluding the 10 acre Bank Swallow Protection Area), approximately 95 acres are steep cliff or dense vegetation, and are not accessible for any use. Of the remaining 85 acres, the Proposed Plan includes 35 acres (41%) for off-leash dog use. In addition, most of the trails and parking lots would be available for dogs on leash. At Crissy Field, dogs will be permitted in most places. Approximately 30% of the airfield, and 40% of the beach front mileage would be available for off-leash dog use. In addition, the rest of the airfield, the East Beach picnic area, and nearly all of the trails would be open to dogs on-leash.

9. Why does the Proposed Rule limit dogs to a maximum of six dogs per dog walker when the City of San Francisco permits up to eight dogs?

A maximum of six dogs per dog walker is the standard limit on public lands throughout the country, and in all jurisdictions surrounding the park, except the City of San Francisco. During the multi-stakeholder Negotiated Rulemaking process in 2006/07, there was a consensus that six dogs is a reasonable maximum. When the matter was being considered by the San Francisco Board of Supervisors in 2013, the San Francisco Animal Care and Control Department advised a six dog limit; the Supervisors decided upon a maximum of eight dogs. GGNRA currently has an interim compendium limit on six dogs and this limit has been very well received by the commercial dog walking community.

10. What is GGNRA doing to protect wildlife and native plants from dogs?

The park considered impacts to wildlife and native vegetation in designating areas where dogs would be permitted. Areas with known or probable sensitive wildlife or plant species were designated as off limits to dogs or for dogs only on-leash. Additionally, trails away from developed areas were designated as dog-free areas because these areas have the highest prevalence of wildlife and native plant species, and are more susceptible to disturbance and damage by dogs on or off-leash. Once a dog rule is implemented, regulations related to the impact of dog use on wildlife and plants would be monitored for compliance.

11. Would access to GGNRA recreational uses be reduced?

Visitors enjoy dozens of different recreational activities in GGNRA, and well-managed dog walking can be a healthy, enjoyable and appropriate experience in many areas of the park. The Proposed Rule will not eliminate any recreational activities. For those who avoid or do not visit an area of the park because they want a dog-free experience, the rule could increase recreational access. For those who want maximum off-leash dog walking, the rule would reduce the area available for that use. Overall, the Proposed Rule would not diminish the recreation opportunities for the more than 17 million annual visitors who use the park for a countless variety of recreation experiences.

12. What is the Monitoring Based Management Program?

All areas open to dog walking would be subject to a Monitoring and Management Program. This program would include regular monitoring and recording of compliance with the Final Rule and other regulations related to potential impacts of dog use of the park. If the Superintendent determines the level of compliance to be approaching unacceptable levels, then primary management action would be taken to address noncompliance. Examples include additional outreach and education, increased area-specific enforcement, fine increases, and additional barriers to increase separation of areas. If primary management actions do not address the problem, secondary actions would be taken, such as short or long term closure of some areas to dog walking, additional use restrictions, or increased buffer zones. The park will involve the public in developing and implementing the Monitoring and Management Program, through workshops and recurring meetings with the public.

13. What are the steps in the overall dog management planning and rulemaking process? Where does the Proposed Rule fit in?

- a. Notice of Proposed Rulemaking (2002)
- b. Scoping for development of a dog management plan – included an Negotiated Rulemaking process (2002-2006)
- c. Release and comment period for Draft Dog Management Plan/Environmental Impact Statement – DEIS – with six alternatives (2011)
- d. Release and comment for Draft Dog Management Plan/Supplemental Environmental Impact Statement – SEIS – with NPS preferred alternative (2013-2014)
- e. **CURRENT STEP:** Release and comment on Proposed Rule based on SEIS preferred alternative (Winter 2016)
- f. Review of comments on SEIS and Proposed Rule (Summer 2016)
- g. Release of Final Environmental Impact Statement – FEIS – incorporating public comments and identifying a final preferred alternative (Fall 2016)
- h. Record of Decision issued that selects the preferred alternative, pending adoption of the final rule (Fall 2016/Winter 2017)
- i. Final Rule published in Federal Register that reflects the selected alternative; the rule may be implemented 30 days thereafter (Winter 2017)
- j. NPS will initiate a public outreach and education effort to increase understanding of and compliance with the new rule.

14. Will there be public meetings on the Proposed Rule? Will there be an opportunity for attendees to make a public statement during the meetings?

There will be six public informational meetings – two each in Marin County, San Francisco, and San Mateo County – during the 60-day public comment period. The dates and times of these meetings will be publicized well in advance and in a variety of ways. At these meetings, there will be opportunities for the public to learn about the content of the Proposed Rule and ask questions, speak directly one-one-one to park staff, and briefly speak publicly to the assembled group if desired. For comments to be officially submitted, they must be submitted either directly to the superintendent by mail, or through regulations.gov as noted in #14 below.

15. If I can't attend one of the public meetings, will I have a chance to hear a presentation on the content of the Proposed Rule?

Yes. We will post a video recording of one of the public information meetings and the subsequent question and answer session on our website during the comment period. Park staff will also answer phone and email questions from individuals throughout the public review period.

16. Where can the public get the Proposed Rule and how can comments be submitted?

The Proposed Rule is available for review and comment for 60 days, from February 24-April 23, 2016. Visit regulations.gov (search, "RIN 1024-AE16") to review and comment on the Proposed Rule online. To have a copy of the Proposed Rule mailed to you, please call 415-561-4728. Copies of the Proposed Rule may also be picked up in person at Golden Gate National Recreation Area headquarters, Building 201, Upper Fort Mason, San Francisco (Bay and Franklin Streets).

Comments may be submitted:

- Online at regulations.gov (search "RIN 1024-AE16")
- By mailing comments to Christine Lehnertz, Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123-0022.

Comments will be accepted only as described above, and will not be accepted by fax, email, or in any other way than those specified above. Bulk comments in any format (hard copy or electronic comments submitted on behalf of others) will not be accepted.

QUESTIONS AND ANSWERS [Additional questions for NPS/DOI use only]

About the Proposed Rule

1. **How does the Proposed Rule differ from/relate to the Dog Management Plan?**

The Dog Management Plan was prepared pursuant to the requirements of the National Environmental Policy Act. As a NEPA document, it analyses a range of alternative approaches to dog management in 22 locations of the park. The Proposed Rule is a draft regulation that would govern where and how dogs would be able to use the park. The Proposed Rule reflects the NPS preferred alternative from the Supplemental Environmental Impact Statement (SEIS) with a few minor modifications.

2. **Who developed the Proposed Rule?**

Development of the Proposed Rule was managed by an interdisciplinary team at Golden Gate National Recreation, with advice and assistance from the NPS Environmental Quality Division, the Department of the Interior Solicitor's Office, and others in the NPS Pacific West Regional Office and NPS Washington Office of Regulations.

3. **Who is the decision maker for the Final Rule?**

The final Rule will be reviewed by the Director of the National Park Service with final approval by the Assistant Secretary of the Interior for Fish, Wildlife, and Parks.

4. **Does the Proposed Rule apply to all lands within the boundary of GGNRA?**

The Proposed Rule applies only to 22 specific park locations, all of which are located on land managed by the NPS. It does not address lands within the park boundary managed by other agencies such as the Presidio Trust, California State Parks, Point Reyes National Seashore, Marin Municipal Water District, or the San Francisco Public Utility Commission.

NPS-managed lands within the park boundary that are not in the places specifically covered in the Proposed Rule would continue to be governed by the existing NPS-wide pet regulation which requires dogs to be kept on a leash, or otherwise restrained, where they are allowed. (36 CFR 2.15)

5. **How will the Proposed Rule protect wildlife and plants?**

Approximately 69% of the miles of beaches in the park would be dog-free to protect sensitive habitat and nesting sites, and allow others who seek a dog-free experience to enjoy a beach in this way. Dogs would not be allowed on trails away from generally developed areas, to protect wildlife and plants from disturbance. Other areas, too, are closed to dogs to protect plants and wildlife. The outreach and enforcement that would follow publication of a final rule will also help protect natural resources by ensuring that dog walking is conducted in areas appropriate for that use.

6. **Why do the groups representing off-leash dog interests say that this is the single largest loss of access to GGNRA, and reduces dog access to less than 1% of the park?**

Dog management planning does not affect recreation access to the park in general; it is focused on one type of use – dog walking – and seeks to provide opportunities for a variety of park users and recreational activities. While GGNRA is 80,000 acres in total, the NPS manages only 18,500 acres, including some land that is inaccessible to all visitors due to steep slopes and cliffs or dense vegetation. Of the 8.75 miles of beaches, about 2.7 miles (or 31%) would be available for dog walkers, of which 2.3 miles (over 26%) would be available for off-leash dog use. Of the 137 miles of trails addressed in our planning process, approximately 46 miles (or about 34%) will be available for dog walking.

Rule Implementation and Enforcement

7. Once the rule is finalized, how would it be implemented?

Education about the rule, effective signage to delineate areas for different kinds of uses, the installation of additional receptacles for dog waste, the institution of programs that emphasize appropriate dog use (like the “Bark Ranger” program at Sleeping Bear Dunes National Lakeshore), and an enhanced law enforcement effort would be initiated when the rule is implemented. We would work with community members in developing many of these and other implementation elements.

8. How would the rule be enforced? Would additional funding/staff be allotted to the NPS to enforce the Rule and cover other implementation costs?

Clear rules and improved signage and education would help ensure the success of the rule, and additional law enforcement would be needed during the transition and following the implementation of the rule. Implementation costs are expected to range from \$1.6-2.4 million in the early years of implementation. Among other things, this would fund parkwide signage changes; gates and other use separation measures; outreach and education staff; additional law enforcement, maintenance, and outreach and education, natural resources and other staff needed to support monitoring, signage, education and permitting. Some of these costs are expected to reduce over time, as the rule becomes better understood and compliance increases. Funding would be dedicated by NPS to accomplish these and other implementation tasks.

9. How are you going to monitor compliance with the Final Rule?

All areas open to dog walking would be subject to a Monitoring-Based Management Program. This program would include regular monitoring and recording of noncompliance with the rule, including dog-related violations of other NPS regulations. If the General Superintendent determines the level of noncompliance to be at or approaching unacceptable levels, management action would be taken. Examples include additional outreach and education, increased area-specific enforcement, fine increases, or additional barrier of separation of areas. If primary management actions do not address the problem, secondary action would be taken, such as short or long term closure of some areas to dog walking; additional use restrictions; or increased buffer zones.

10. Would there be a phase-in of the Final Rule?

We anticipate the rule would go into effect 30 days after publication in the Federal Register. A major emphasis would be placed on education to ensure understanding of the rule, but visitors would be expected to adhere to the rule, as well as other regulations concerning protection of resources and visitors.

11. How much is the fine for violating the Rule?

NPS is working with the Department of Justice on a fee schedule for violation of the rule. In general, fines would start at \$125, but may be more depending on the nature of the violation.

12. What is the definition of “voice and sight control” in the Proposed Rule?

Voice and sight control means that dogs must be within direct eyesight of the dog walker, and that dog walkers must be able to immediately recall their dog(s) to their side so that a leash can be attached to the dog’s collar. Dog owners must be able to demonstrate this ability when requested by a law enforcement officer.

13. Would there be a role for stakeholders to help shape implementation of the Dog Management Plan?

Following completion of the NEPA and rule-making processes, NPS would seek input from stakeholders on key implementation components such as location and language of signage, visitor education programs, and design and implementation of data collection.

14. If there is not adherence to the Rule, would restrictions on dog use be tightened?

If the Superintendent determines that compliance with the rule is approaching an unacceptable level, primary and, if needed, secondary management actions would be taken. Increased restriction of dog use is among the secondary management options available to the Superintendent.

15. If the dog management plan proves successful, would the park consider relaxing restrictions on dog use?

If successful, the overall dog management plan which includes the rule and education and monitoring program, would protect park resources, provide for visitor safety, and reduce user conflicts. The proposed rule currently lays out the maximum extent of dog walking the park believes it could provide while meeting its mandates and management responsibilities.

16. What are the current rules governing dog management at GGNRA?

Currently, dog management at GGNRA varies by area, and is a combination of the following:

(1) The NPS regulation found at 36 CFR 2.15 applies to all areas not governed by the 1979 Pet Policy and to newly acquired lands. This regulation requires that dogs be crated, caged or restrained where dog walking is permitted.

(2) The GGNRA Citizen Advisory Commission's 1979 Pet Policy allows off-leash dog walking in certain areas of GGNRA and remains in effect following a 2005 ruling by the U.S. District Court. See *US v. Barley* (405 F.Supp.2d 1121 (N.D. CA 2005)).

(3) The Special Regulation found at 36 CFR 7.97(d), which was issued for the protection of western snowy plovers on Ocean Beach and the Wildlife Protection Area at Crissy Field, prohibits off leash dog walking in these two areas on a seasonal basis.

(4) Interim Compendium requirements (2014) for commercial dog walking.

Adoption of a special regulation would simplify the regulatory scheme by superseding the Pet Policy, the special regulation for Ocean Beach and Crissy Field, and interim restrictions on commercial dog walking.

What's Next?

1. What comes next in the process? When would the Final Rule be released?

Public comments on the Proposed Rule will be analyzed. Then, a Final Dog Management Plan/EIS (FEIS) would be prepared and released. After a thirty day waiting period, a Record of Decision (ROD) would be published, and would include a description of the process of the development of the Dog Management Plan, and a rationale behind the decision on dog management, pending publication of a final rule. After publication of the ROD, a final rule would be published. This is anticipated to be published - known at that point as the "Special Regulation for Dog Walking in GGNRA" - in the Federal Register - in the summer or fall of 2016. We anticipate the special regulation would become effective 30 days after publication in the Federal Register.

Dog Management Planning in General

1. Many people feel that dogs should never be off-leash in a national park, consistent with the rules governing all of the 409 units of the National Park System. Why is off-leash dog walking being considered in GGNRA?

Golden Gate National Recreation Area has a unique set of characteristics that support consideration of off-leash dog walking in some areas of the park:

- The park includes properties which had historically been used for off-leash dog walking
- The 1979 Citizen's Advisory Commission Pet Policy that recommended the continuation of those uses had been in place for over 20 years
- GGNRA parkland is located immediately adjacent to one of the most densely populated urban centers in the United States, and many of the park's visitors come from the nearby communities
- The park manages a significant portion of the public recreational open space – particularly beaches - in San Francisco and Marin Counties.

The Proposed Rule would allow for continued dog walking in the park, including off-leash dog walking in some areas, in a way that is consistent with NPS management policies and statutory mandates.

2. Why not stick with the 1979 Pet Policy as the Rule, but simply enforce it more effectively?

The 1979 Pet Policy, as a whole, would not meet the purpose or need of the plan- even assuming compliance, increased education and enforcement, Voice and Site Control guidelines, and a monitoring management

strategy. A primary reason for this is the geographic scope of the 1979 Pet Policy, which opens many *entire* sites to off-leash dog walking with no restrictions on the areas of use within the sites, including the dog walking areas of Fort Funston, Ocean Beach, and Crissy Field.

3. What is your evidence that there are problems with the current situation?

As documented in the SEIS, dog rule incidents (which include both warnings and citations) constitute a major component of law enforcement activity in many of the areas covered by the Proposed Rule. However citations are not issued for all observed incidents, and many incidents go unreported by park visitors. GGNRA has received comments from visitors reporting that dogs have bitten people, chased wildlife, killed other dogs, dug up plants, scared children, knocked over elderly persons, disrupted picnics, and interfered with bicyclists, joggers and walkers. Park employees and police horses have been bitten by dogs, and park rangers have been put at risk rescuing off-leash dogs from cliff faces in the park.

4. Does GGNRA have site-specific studies on the impacts of dogs on wildlife or natural resources?

NPS relied on a number of peer-reviewed studies that documented the impact of dog walking on natural resources in other park settings, but not specifically at Golden Gate National Recreation Area. The relevant studies are cited in the SEIS.

5. Would the outcomes of the GGNRA dog management planning process likely serve as a precedent for other National Park units?

No. The rule that is instituted at Golden Gate National Recreation Area would apply only to that unit of the National Park System.

Public Involvement

1. How did NPS consider the public comments on the DEIS and SEIS – did the park make any changes as a result of public comment?

The park carefully considered all comments received in the decision-making process.

Examples of changes that were made as a result of public comment include:

- the shape of the off-leash areas in upper Fort Funston was changed to permit off-leash access from the upland area to the beach, and to reduce possible user conflicts;
- the off-leash area on the Crissy Field airfield was moved to the central area to allow a buffer zone for the tidal area marsh birds, less conflict with events, and the visitor flow anticipated from the New Presidio Parklands connection from the Presidio Main post;
- Rancho Corral de Tierra, not considered specifically in the 2010 DEIS, was zoned for dog management, with four new trail segments designated for on-leash use;
- at Fort Baker, a trail in a sensitive habitat area was eliminated as an on-leash location;
- an on-leash dog area was added at Muir Beach;
- an off-leash trail designation was eliminated in Oakwood Valley.

2. Did NPS ignore the resolutions by the boards of supervisors of all three counties, as well as the written comments from other local, state, and federal elected officials that the dog management plan was too restrictive of off-leash dog walking?

NPS carefully considered the input of elected officials at every stage of the dog management planning process, and has met with many of these elected officials to discuss concerns a number of times in the planning process. However, there are fundamental differences in management responsibilities between national parks and local parks. Golden Gate National Recreation Area is part of the 409-unit National Park System, and therefore has the obligation to manage and protect park resources for the benefit of the people of the entire nation for perpetuity.

3. Since the majority of comments favored either maintaining the status quo, or providing even more off-leash dog opportunities, why did the NPS not provide for more off-leash dog opportunities between the Draft and Supplemental EIS?

In preparing the DEIS, starting in 2008, NPS evaluated every area within the scope of the plan and was able to identify seven areas where off-leash dog walking could occur, while meeting the plan objectives of protecting

resources and continuing to provide a variety of visitor experiences. During evaluation of the SEIS preferred alternative, we found one additional area (Fort Mason) where off-leash dog walking could occur, and one area (Oakwood Valley) where resource issues and the potential for visitor conflicts resulted in the area being designated in the rule for on-leash dog walking only.

4. **Why are there no off-leash areas in San Mateo?**

Several sites in Rancho Corral de Tierra – one near Farralone View School in Montara, and another in El Granada - were considered for off-leash use, but ultimately some were dismissed and others were not included in the preferred alternative due to resource-related concerns. We have been working with San Mateo County Parks Department on a regional approach to addressing the local desire for more dog areas.

5. **Why did you eliminate from consideration setting certain times of day for dogs to use certain areas?**

Timed use was not adopted as a general way to manage dog use in the park, except in the case of those walking 4-6 dogs under a permit. Timed use has the potential for problems such as public confusion, difficulties for enforcement, conflicts among user groups, and threats to wildlife, which are often most active during the early morning or late afternoon periods. However, timed use remains an option for dog management in the future if conditions warrant, or as a mitigation measure under the monitoring-based management strategy.

6. **Many feel that commercial dog walking is in no way a purpose of the park. Why are you allowing commercial dog walking in the park at all?**

The NPS is proposing to regulate commercial dog walking through issuance of special use permits. Law and National Park Service policy provide a park superintendent the discretion to allow special uses if they support the mission of the National Park Service, add to the public understanding and enjoyment of the park, promote a sense of ownership and stewardship for the park and its resources, enhance the protection of park resources and values or provide for an increased level of visitor safety. Special use permits cannot be issued if they have unacceptable impacts on park resources and values or visitor experiences. The NPS has evaluated the impacts of dog walking allowed through special use permits (those walking 4 - 6 dogs, including commercial dog walkers) and concluded that these criteria would be met by the preferred alternative and proposed rule. The proposed rule would limit the areas, times, and degree of use by special use permittees, and monitor such use through the monitoring management program to ensure that unacceptable impacts will not occur.

7. **Won't the Draft Dog Management Plan and Associated Proposed Rule result in an increase in the number of dogs in parks in neighboring jurisdictions, displacing them to locations such as the City of San Francisco parks?**

Despite a survey in 2013 by the NPS to assess the potential for displacement of dogs from NPS land to neighboring jurisdictions, it has been difficult to forecast with accuracy what the displacement effect might be. Nevertheless, NPS assumes there could be some displacement and characterized potential impact of displacement as “minor to moderate” in the SEIS. Please see Chapter 4 of the SEIS for additional information. The park would continue to work with neighboring jurisdictions to monitor the impacts of displacement and look for regional solutions to support people with canine companions who live near the park.

8. **Why are no dogs permitted in the less developed areas of the park such as most of the trails in the Marin Headlands 'backcountry,' even on leash? Why are there just a few loop trails?**

The less developed areas of GGNRA are where plants and wildlife tend to be concentrated and are more highly susceptible to disturbance by dogs. Also, many park visitors seek the experience of relative solitude away from developed areas of the park, and that solitude may be impacted by the presence of dogs, on- or off-leash. For these reasons, loop trails are also not considered, except for the Old Bunker Fire Road and Batteries Loop Trail in the Marin Headlands.

9. **How would the Draft Dog Management Plan and Associated Proposed Rule protect stream water quality in the park?**

The Proposed Rule would keep off-leash dogs away from streams, therefore reducing turbidity and dog waste that can degrade water quality and affect wildlife

10. How would the various areas designated for off-leash or on-leash be effectively separated from areas where dogs are not permitted?

Landscape design elements would be researched to identify a range of options for clearly-delineated areas with separations that do not preclude wildlife and would allow wildlife movement, but signal different use areas and support safe visitor experiences. These could include vegetative barriers where feasible and/or landscape forms or fencing. Additionally, new signage would be installed to further define the uses in adjoining areas. We would be looking for more public input in effective area delineation when the planning process is complete.

11. GGNRA is a national recreation area, not a national park. Why do you keep using the term “national park?”

While there are over 30 terms used to describe the 409 units of the National Park System, all are guided by the same NPS Management Policies, regardless of title. Congress amended the 1916 NPS Organic Act in 1970 and again in 1978 to make clear that NPS must manage all units of the National Park System to the same high preservation standard. We sometimes refer to Golden Gate National Recreation Area as a park, or the lands of the park as parklands, for the sake of simplicity; it does not imply that recreation is not among the values Congress cited in establishing the GGNRA. In fact, for the past two years, the park has welcomed more recreational visitors than any other national park in the system.

12. How are the needs of people with disabilities reflected in the Proposed Rule?

The park is continuing to work on accessibility throughout the park. For some visitors with mobility issues – wheelchair users and others – a dog-free experience is preferred, and the Proposed Rule identifies some areas where dogs would not be allowed. For others with disabilities, enjoying the park with a dog is an important recreational pursuit. Many of the on-leash areas are fully accessible, and there are some accessible points of entry to several of the proposed off-leash areas.

13. Did the 2014 General Management Plan (GMP) drive the identification of the NPS preferred alternative in the Dog Management Plan?

No. The Dog Management planning process preceded the GMP by several years, and there is an explicit provision in the Record of Decision on the GMP that indicates that should there be any conflicts between the GMP and the provisions of the Dog Management Plan and Rule, the provisions in the Dog Management Plan would take precedence.

14. Where is the science supporting limits on dog use?

Regulation of dog use in the GGRNA is based on a need to ensure protection of resources, increase safety, and provide for a variety of visitor experiences. The numerous peer-reviewed documents supporting the analysis of the impact of dog use of the park are listed and cited in the SEIS. Scientific information was one of many contributing factors to proposed dog management planning.

15. How long has the planning effort been underway?

An Advanced Notice of Proposed Rulemaking was published in 2002. Planning for dog management has been underway throughout the intervening 13 years.

Appendix 1: Key Elements of the Proposed Rule

Relationship of Proposed Rule to SEIS

The Proposed Rule is based on the preferred alternative (Alternative F) described in the Supplemental Environmental Impact Statement (SEIS), with some minor modifications. The Proposed Rule reflects the operational elements that would be put in place to implement the preferred alternative. The NPS is seeking comments on how the preferred alternative could best be operationalized.

GGNRA locations covered by the proposed Rule

Marin County: Stinson Beach, Muir Beach, Homestead Valley, Oakwood Valley, Alta Trail, Marin Headlands/Rodeo Beach & Vicinity, Marin Headlands/Rodeo Valley, and Fort Baker.

San Francisco County: Fort Mason; Crissy Field; Fort Point National Historic Site; Baker Beach; Lands End; Fort Miley; Sutro Heights Park; Ocean Beach; Fort Funston. Lands managed by the Presidio Trust would continue to be managed in accordance with the Trust's regulations in 36 CFR Part 1001, until such time as they adopt their own special regulation.

San Mateo County: Mori Point, Milagra Ridge, Sweeney Ridge, and Rancho Corral de Tierra. Cattle Hill, though not currently in NPS has been proposed to be managed by GGNRA under an easement, and as such is also included.

Changes from the SEIS preferred alternative to the Draft Rule

- Addition of description of conditions for walking four to six dogs under an NPS permit
- Changes to two Voice and Sight Control Areas (formerly known as Regulated Off Leash Areas, ROLAs) - Crissy Airfield and upper Fort Funston
- Addition of four new trail segments for on-leash dog walking (Rancho Corral de Tierra)
- Addition of clarifying definitions
- Clarified considerations for the Monitoring and Management Program
- Updated and corrected trail and road names. In some cases, these are different from the names used in the SEIS. These trail and road name changes have no operational impact.
- Addition of authority for the superintendent to determine whether new trails in the 22 locations would allow dogs on-leash

Elements Common to all locations

- Dog walking would be prohibited except in the specific areas or on the trails identified in the proposed Rule.
- Dog walking would not be allowed off-trail, in campgrounds, on designated swimming beaches, on informal (aka, "social") trails, in public buildings, or in any area not designated by the proposed Rule as open to dogs.
- Dog walking on-leash would be allowed in parking lots, on sidewalks, and on shoulders of paved, public roads.
- All dogs would be required to have a current rabies vaccination.
- All dogs must be licensed and tagged in accordance with ordinances of the county where the owner resides.
- Each dog walker would be required to have the dog owner's name, home address, and phone number available for each dog walked and must provide this information upon request to any person authorized to enforce the regulation.
- Service animals accompanying a person with a disability would be allowed in the park according to National Park System-wide regulations.
- Informal trails are not listed in the proposed Rule and would be closed to dog walking.
- Dog walking areas would be delineated and marked. Landscape design elements (e.g. vegetative barriers, fencing, signage, landscape contours, paths, etc.) could be installed to aid differentiation of dog walking areas provided that wildlife movement is maintained. Landscape design elements could also be utilized to protect restoration areas, delineate areas that require closure or separation for safety purposes, to reduce user conflicts, or to address other dog management needs.

- No more than six dogs could be walked per dog walker at any one time.
- No more than three dogs could be walked per dog walker without an NPS special use permit, for which there would be a fee; permits would specify the areas, times and conditions under which this activity may occur, and would be required to be displayed.
- Permits would require proof of liability insurance and approved dog-handling training through existing regionally or nationally-accredited training courses.

Monitoring-Based Management Program

- All areas open to dog walking would be subject to a Monitoring-Based Management Program. This program would include regular monitoring and recording of compliance with the Rule, including dog-related violations of other NPS regulations. If the General Superintendent determines the level of compliance to be approaching unacceptable levels, than a variety of primary management actions would be taken including additional outreach and education, increased area-specific enforcement, fine increases, or additional barrier of separation of areas. If primary management actions do not address the problem, secondary actions would be taken, such as short or long term closure of some areas to dog walking; additional use restrictions; or increased buffer zones.

Appendix 2: Stakeholder Outreach

Federal Congressional Delegations			
Name	Position/Organization	Phone	Email
Dianne Feinstein	US Senator		
Jennifer Duck	Chief of Staff	202 224-03841	jennifer.duck@feinstein.senate.gov
Sean Elsbernd	Local POC	415-393-0707	Sean.elsbernd@feinstein.senate.gov
Barbara Boxer	US Senator	202 224 3553	
Laura Schiller	Chief of Staff	202 224-3553	Laura_schiller@boxer.senate.gov
Joshua Quigley	Local POC	510 286-8537	Joshua_quigley@boxer.senate.gov
Nancy Pelosi	Representative/Minority Leader		
Robert Edmondson	Washington Director	202 225-0100	Robert.edmondson@mail.house.gov
Dan Bernal	District Director	415 556-4862	Dan.bernal@mail.house.gov
Jared Huffman	Representative	202 224 5161	
Jerry Callaway	District Director	415 258-9657	Jenny.callaway@mail.house.gov
Jackie Speier	Representative	202 225 3531	
Katrina Rill	District Contact	650 342-0300	Katrina.rill@mail.house.gov
Brian Perkins	District Director	650 342-0300	Brian.perkins@mail.house.gov

Organization	Contact	Contacted By	Email
SF Mayor's Office	Steve Kawa, Chief of Staff	Chris Lehnertz	
SF Parks and Rec	Phil Ginsburg; Sarah Madland	Howard Levitt	
San Mateo County Parks	Marlene Finley	Howard Levitt	
Marin County Parks and Open Space	New Director	Mia Monroe	
California State Parks	Danita Rodriguez	Howard Levitt	
EPA	TBD	Mike Savidge	
SF Supervisors: Eric Mar, Katy Tang, Norman Yee, Aaron Peskin, Scott Wiener	Supervisors or staff directors	Howard Levitt	
SF Mayor Lee, Steve Kava	Steve Kava	Christine Lehnertz	
Marin Co. Supervisors: Steve Kinsey, Kate Sears	Supervisors or staff directors	Howard Levitt	
San Mateo Co. Supervisors: Don Horsley	Supervisor Horsely	Howard Levitt	
Pacifica City Council	TBD	Christine FitzGerald	

CA State Assembly Members: Phil Ting, Mark Levine, David Chiu	TBD	Howard Levitt	
CA State Senate: Mark Leno	TBD	Howard Levitt	

Local Organization and Stakeholder Representatives			
Name	Position & Organization	Contacted by	Phone
Martha Walters Gary Fergus	Crissy Field Dog	Howard Levitt	
Brent Plater	Wild Equity	Howard Levitt	
Andrea Buffa David Emanuel	Save Our Recreation	Howard Levitt	
Cindy Margulis	Golden Gate Audubon Society	Howard Levitt	
Becky Evans	Sierra Club	Howard Levitt	
Sally Stephens	SF Dog Group	Howard Levitt	
Director	SF Unified School District (@Funston)	Howard Levitt	
Bill Bechtell Christina	Montara Dog Group	Christine FitzGerald	
Brent Plater	Wild Equity, Inc	Howard Levitt	
Neal Desai	NPCA	Howard Levitt	
Amy Meyer	People For the Parks/ Presidio	Chris Lehnertz	
Nona Dennis	Marin Conservation League	Mia Monroe	
Bill Robberson	SF Sailboard Club	Howard Levitt	
	Professional Dog Walkers	Katie Beltrano	
	Equestrians	Brian Aviles	
Maria Brown	NOAA	Chris Lehnertz	
Matt/Victor	Access 4 Bikes	Mia Monroe	
Annie Burke	Bay Area Open Space Council	Howard Levitt	
Janet McBride	Bay Area Ridge Trail Council	Mia Monroe	415-561-2595 X8
Jim Nixon	California Alpine Club	Mia Monroe	
Paul DaSilva	California Native Plant Society, Marin Chapter	Mia Monroe	415/457-8811
Stephanie Moulton- Peters	City of Mill Valley	Mia Monroe	415/388-4033
Nancy Graalman/ Huey Johnson	Defense of Place	Mia Monroe	415/928-3774

Mitchell Bridger	Environmental Action Committee of West Marin	Mia Monroe	415/663-9312
Vicki Rupp	Environmental Forum Of Marin	Mia Monroe	415/484-8336
Jim Gannon	Friends of Mt Tam	Mia Monroe	707/525-1052
Sara Tashev	Green Gulch/ San Francisco Zen Center	Mia Monroe	
Brian Spring	Homestead Valley Community Association	Mia Monroe	
	Homestead Valley Land Trust	Mia Monroe	
Barbara Saltzman	Marin Audubon Society	Mia Monroe	415/924-6057
Jim Elias	Marin County Bicycle Coalition	Mia Monroe	415/456-3469
Joel Bartlett	Marin Horse Council	Mia Monroe	415/259-5783
Ann Glasscock	Marin Stables and Trails	Mia Monroe	415/601-3047
Michael Kaufman	Muir Beach Community Association	Mia Monroe	415/388-5018
Peter Hindley	Muir Woods Park Community Association	Mia Monroe	
Ellie Cohen	Point Blue	Mia Monroe	707/781-2555
Todd Steiner	Salmon Protection and Watershed network	Mia Monroe	415/663-8590 X103
Michele Barni	Sierra Club of Marin	Mia Monroe	
Marika Bergsund	Slide Ranch	Mia Monroe	
Steffen Bartchatt	Tam Valley Community Services District	Mia Monroe	
Janice Barry	Tamalpais Conservation Club	Mia Monroe	415/451-19912
STAKEHOLDERS	San Mateo County Orgs	Christine Fitzgerald	

Reporters (*recommended for POSSIBLE individual outreach)

Name	Organization	Specialty	Phone	Email
*Felicity Barringer	NY Times	Environmental reporter	415-644-3314 o	fbarr@nytimes.com
*Robert Semple	NY Times	editorial writer (parks-env. etc.)	212-556-1832 o	semple@nytimes.com
*Julie Cart	LA Times	Environmental Reporter	213-237-7113 o 626-437-6689	julie.cart@latimes.com
*Karen Klein	LA Times	Editorial writer (interest in environment issues)	213-237-5000	karen.klein@latimes.com
*Laura Bly	USA Today	travel writer (covers NPs)	703-854-3400 (switchboard)	lbly@usatoday.com
Veronica Stoddart	USA Today	travel editor, LIFE section	703-854-6405 o	vstoddart@usatoday.com
*Glen Nishimura	USA Today	op-ed page editor,	703-854-4426 o	gnishimura@usatoday.com
*Elizabeth Shogren	NPR	environment reporter	202-513-2000 (main)	eshogren@npr.org
*Ray Ring,	High Country N	senior editor	970-527-4898 o	rayring@hcn.org
*Kurt Repanshek	National Parks Traveler		435-645-8680 o 435-640-0829 c	kurt@nationalparkstraveler.com , kurt@kjrwrites.com
Brian Vastag,	Washington	environment reporter	202-334-7410 o	national@washpost.com
Jonathan Capehart	Washington Post	editorial writer politics/environment)		outlook@washpost.com
LOCAL media to contact		SF Chronicle, Marin IJ, Point Reyes Light, Half Moon Bay Review, SF Examiner, Mercury (Paul Rogers)		
		NBC News		
		ABC News		
		CBS News		
		CNN		
		Fox News		
		MSNBC and MSNBC.com		
		Slate.com		
		Salon.com		
		Outside Magazine		
		Backpacker Magazine		
		Energy & Environment Daily/ Greenwire news service		
		Huffington Post		

Appendix 3: Public Informational Meetings

Public Informational Meetings

Below is the proposed sequencing of the formally noticed public informational meetings. One or more will be held in each county of the park.

Registration:

Upon arrival, attendees will provide their contact information and also sign up to make a comment in front of the public.

Open House period:

Begin with an open house of approximately 30 minutes. Stations organized by county will be set up, with maps and display boards, where meeting participants can learn about the Proposed Rule and ask questions of NPS staff.

Formal Presentation:

The public would be invited to a 30-45 minute presentation by NPS staff on the Proposed Rule.

Public Discussion:

Following the NPS presentation, members of the public can ask questions and make clarifying points for the benefit of other meeting participants. Speakers will be limited to 2 minutes, and no response will be provided. Note that these comments will not be formally captured or considered. Comments must be officially submitted by mail to the superintendent, or online through regulations.gov.

Web Post

One public information briefing will be video recorded and posted on the dog management website for those who cannot attend a meeting in person.

GOGA//EQD Employees Available for Public Meetings

1. Christine Lehnertz, General Superintendent
2. Aaron Roth, Deputy Superintendent
3. Howard Levitt, Director of Communications
4. Alex Picavet, Public Affairs Specialist
5. Mike Savidge, Strategic Planning Chief and Dog Management Project Manager
6. Michael Edwards, EQD Environmental Project Manager
7. Brian Aviles, Acting Chief of Planning
8. Bill Merkle, Wildlife biologist
9. Brian Aviles, Chief of Planning
10. Christine Fitzgerald, San Mateo Community Planner
11. Chuck Plummer, Administration
12. Cpt. Pamela Smith, USPP
13. Daphne Hatch, Chief of Natural Resources
14. Mia Monroe, Marin Community Liaison
15. Randy Lavoisier, Chief Ranger
16. Matt Wallet, Supervisory Law Enforcement Ranger
17. Chad Marin, Deputy Chief Ranger

Appendix 4: Key Messages For Field Staff

The text below would be printed out on cards that could be handed out to visitor as needed.

- Golden Gate National Recreation Area’s Proposed Rule is based on the elements of the preferred alternative within the draft dog management plan that relate to where, when and under what circumstances dogs may be walked in the park. The Proposed Rule is a draft regulation that would govern where and how people would be able to enjoy the park with their dogs – on and off-leash.
- The Proposed Rule is available for review through [date].
- Comments on the Proposed Rule can be made in two ways:
 - Online through the [regulations.gov website](https://www.regulations.gov)
 - By mail addressed to the General Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA, 94123.

- For additional information on the Proposed Rule or the dog management planning process, contact Howard Levitt in the park’s public affairs office at 415-561-4728.

Park Acreage

Bay Area Dog Management Zones: Extent of On-leash, Off-leash, and Prohibited Areas

Jurisdiction	City/County of San Francisco	San Mateo County	Marin County Parks	Marin County Open Space	Marin Water District	Point Reyes National Seashore	State of CA	Mid-peninsula Regional Open Space	East Bay Regional Parks	San Francisco Watershed
Area of Managed Land	3,300 acres	16,000 acres; 50 miles of trail	700 acres	15,000 acres; 190 miles of trail and fire road	21,000 acres; 130 miles of trail	71,000 acres	12,000 acres near adjacent to GGNRA	50,000 acres; 220 miles of trail	95,000 acres; 1,150 miles of trail	63,000 acres; 210 miles of rights-of-way
Areas where dogs permitted On-Leash	3,300 acres minus athletic fields/courts; playgrounds; sensitive habitat areas	None	None	190 miles of trails and fire roads	21,000 acres; 130 miles of trail	150 acres of beach (approx.); most 'developed' areas; 15.4 miles of trail	Parking lots and paved roads only; no beaches or trails	17.5 acres; 50 miles of trail	Approx. 90,000 acres	None
Areas where dogs permitted Off-Leash	114 acres; .2 miles of trail	None	None	70 miles of fire roads	None	None	None	17.5 acres	Most areas, excepting parking lots, picnic areas, camping, etc.	None
Areas where dogs prohibited	Athletic fields/courts; playgrounds; sensitive habitat areas	16,000 acres; 50 miles of trail	700 acres	Approx. 14,800 acres (all areas except trails and fire roads)	None	All undeveloped areas; most beaches and trails	All areas except parking lots and paved roads	Approx. 48,930 acres	Approx. 5000 acres of beaches, wetlands, nature areas/ preserves and golf courses	63,000 acres; 210 miles of rights-of-way

From: "Levitt, Howard" howard_levitt@nps.gov
Subject: Dog Comm Plan
Date: November 13, 2015 at 4:46 PM America/Los_Angeles
To: Howard Levitt Howard_Levitt@nps.gov, Wendy Scheffers howandwen@(b) (6),
Adrienne Freeman adrienne_freeman@nps.gov



Hi Adrienne: Here's my in-progress review -made it through p 14; major changes. Please look these over for consistency and if they seem good, accept the changes. I will keep plowing through this and will develop a few new pieces. Have a good weekend. Howard

--

Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
415-561-4730

Attachments:

[Dog Management Plan Nov13 hl.docx](#) (136.1 kB)

Purpose and Goals and Objectives of the Communication Plan

Purpose Dogwalkers, environmental groups, and affiliated, regional interest groups from SF Society for Prevention of Cruelty to Animals and county humane societies to Wild Equity, Golden Gate Audubon, Coleman Advocates for Families and Youth, Disability Rights Advocates, as well as gateway community groups have stirred the vocal interest of their local county supervisors and therefore also Congressional representatives on this issue, the general public, members of Congress and their constituencies, and other interest groups have substantial—even intense—interest in this issue.

For over 13 years, NPS had been working to develop a special rule for dog management at Golden Gate National Recreation . This process has engendered high interest among local dog walking advocates, environmental organizations, various user constituencies, and federal, state and local elected officials. Media interest in this issue is high.

This communication plan provides information about the process and-timing and strategy of activities relating to release of the Proposed Rule for Dog Management for Golden Gate National Recreation Area. It also provides key messages information for NPS and DOI staff to use in answering-addressing public questions about the Proposed Rule and about dog management in general at Golden Gate National Recreation Area. ¹

Goals

- Ensure that NPS and DOI deliver one-consistent message inge about a very-complicated issue
- ~~Provide accurate information and transparency in decision-making and avenues for public involvement~~
- Identify strategies for elected official, interested stakeholder, media and general public outreach and information
- Be proactive in putting-outcommunicating the-dog management messages

Project In Brief

- The Proposed Rule for Dog Management in Golden Gate National Recreation Area, which would-will reflect the NPS preferred alternative from the Supplemental Draft Environmental Impact Statement (SEIS), is being released in January 2016 for a 60- day public review and comment.
- The Supplemental Draft EIS (SEIS) was open for public review from September 6, 2013 through January 11, 2014. It outlined the preferred alternative and five alternatives for dog walking management in 22 distinct locations within Golden Gate National Recreation Area. It, and included seven areas where regulated off-leash dog walking could an occur, as well as areas where-for dogs must-be on leash, and places where dogs would are not be permitted.
- At least tThree noticed public information meetings and several additional informal informational briefings are-will be scheduled during the comment period on the Proposed Rule in local communities in each of the three counties of the park. Meetings
- Briefings forwith neighboring city and county agencies and key stakeholders will also be held.
- A comprehensive media outreach campaign will be undertaken to clarify the proposal and encourage broad stakeholder participation in the process.
- Key elected officials will be briefed before and after the release of the Proposed Rule.

[±] Please look at Mike Savidge's addition, highlighted above. (I'd personally opt to leave it as is.) His comment is: "WE can be more specific in representing the regional and county interest here. This suggests that there is "broad" public "intense" interest. While we might want to broaden it, I would suggest that it is currently more strong, topical interest amongst different local affiliated dog walker and environmental groups, as well as their local county representatives and therefore has attracted interest of representative congressional members from each county who are being lobbied by intense off-leash dog walking advocates who are broadening the issue to the purpose of a 'national recreation area' to galvanize broader opposition to dog walking limits in this proposed rule."

FUNDAMENTAL KEY MESSAGES

- The Proposed Rule is the operational reflection of the NPS preferred alternative from the SEIS. It translates the regulatory aspects of the preferred alternative into a proposed rule, unique to the GGNRA. It is informed by an analysis of the comments received on the SEIS, as well as further staff review. It will describe in detail where and how people will be able to enjoy the park with their dogs – on and off-leash – as well as parameters for responsible dog walking within the park. The document will be less than 40 pages long.
- The Proposed Rule ~~for Dog Management~~ will reduce conflicts between recreation users, allow visitors to select an experience that suits them, give everyone a national park experience, provide a safer place for children and all users, protect natural and historic resources, clarify rules and delineate areas for dog use, and provide guidelines for better enforcement of dog use rules.
- The Proposed Rule establishes seven areas of the park for off-leash dog walking, allows dogs on most park beaches, retains many trails in the park for onleash dog use, allows for commercial dog walking in some areas, protects endangered species and their habitats, allows for hiking and other experiences that are dog-free, and protects children, elders, and people with disabilities from overzealous dogs. balances the often conflicting desires of a broad spectrum of park users in a way that best accommodates these desires while assuring protection of park resources for the future.
- The Proposed Rule achieves the goals of providing for a variety of visitor experiences, protecting important park resources, and eliminating safety issues and users conflicts to the maximum extent possible.
- The Proposed Rule is the result of 13 years of ~~hard~~ work by thousands of park users and interested stakeholders through hundreds of formal and informal public discussions. It, and is informed by thorough review of relevant studies and reports, and is backed by extensive analysis of environmental issues and impacts.

Table 1: Schedule of Key Release Schedule of Key Events Events: Public Review of Proposed Rule

Task:	Implemented By:	Implemented On:
-Prior to release of documents		
Plan Listening Tour Schedule Notified / Informational briefings Meetings	GOGA: Howard Levitt	Late October ² November 2015
Email blast to stakeholders alerting them to tentative schedule of release and upcoming meetings on TBD.	GOGA: Howard Levitt	Done - November 3, 2015 ³
NPS Notice of Availability (NOA) submitted to Federal Register (for pre-publication in Federal Register Reading Room on date	GOGA: Mike Savidge EQD: Michael Edwards	Submission Date TBD Publication Date TBD
Emails or personal or phone call briefings : Congressional Washington & local staff from CA delegations (see Table 5) Stakeholders and Agency representatives (see Table 6) News Media (see Table 7)	GOGA: Howard Levitt Alex Picavet- Media	Day Day before the release of the Proposed Rule
Develop newsletter for Proposed Rule release and posters / other materials for public meetings, as well as webinar (may want to pre-record) ADD CELL: Submit materials for PWR and WASO review	EQD: Michael Edwards, GOGA: Mike Savidge, Howard Levitt	Date? Date?
Prepare general press material Prepare Op-Ed	GOGA: Adrienne Freeman Alex Picavet, Howard Levitt	Dec 1
Prepare park staff briefing sheet ADD CELL Prepare talking points for phone calls, informational	GOGA: Adrienne Freeman, Alex Picavet, Howard Levitt	Dec 1
Newsletter for Proposed Rule public review and emailed	EQD: Chuck Plummer (via Constant Contact)	Two days prior to release??
Day of document release (Date TBD, 2016⁵)		
Proposed Rule Published in Federal Register; this formally begins public comment period	WASO: Russ Wilson EQD: Michael Edwards	As soon as possible Day of Release; this begins 60/90 day public comment period on proposed Rule)
Proposed Rule made available via Regulations.gov and the Federal Register	EQD: Michael Edwards, GOGA: Chuck Plummer	Day of Release - 10:00 a.m. PST
GOGA press release (# 1), & tweet social media release, and publish on websites for proposed Rule	GOGA: Alex Picavet, Howard Levitt, PWR: Craig Dalby	Day of Release - 10:00 a.m. PST
GOGA Dog Management planning web page update goes live	GOGA: Craig Glassner, Chuck Plummer	Day of Release or evening before- 8:00 a.m. PST ⁴
Courtesy Calls: Agency representatives (see Table 6)	GOGA: Chris Lehnertz, Mike Savidge, Howard Levitt EQD: Michael Edwards	Day of Release - 10:30 AM - to noon 11:30 a.m. PST

² Change to ???????

³ I've changed this to reflect correct date

⁴ Needs to be live at 8am the day of release or even prior, per Michael Edwards

<u>News Media</u> Conference call: News Media (see Table 7)	GOGA:Chris Lehnertz, Howard Levitt, Alex Picavet	<u>Day of Release - 1:00-2:00 PM</u> 12:00 to 1 p.m. PST
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Table 1: Schedule of Key Release Events (continued) - Public Review Proposed Rule

Task:	Implemented By:	Implemented On:
Personal Calls as needed <u>to PT, Parks Conservancy, SF Rec and Park, etc</u>	GOGA: Chris Lehnertz, Howard Levitt	<u>Day of Release</u>
One <u>W</u>week <u>A</u>fter <u>d</u>ocument <u>r</u>elease		
GOGA press release (#2) <u>and social media released & tweet and publish on websites about <u>noticed</u> public meetings informational meetings</u>	GOGA: Howard Levitt, Alex Picavet	date TBD
One <u>M</u>onth <u>A</u>fter <u>R</u>elease <u>P</u>ublic meetings on Proposed Rule (see Table 10 for GOGA staffing)		
Reg Neg/ stakeholder/ County Supervisors meeting –	GOGA: Chris Lehnertz, Howard Levitt, Mike Savidge, Shirwin Smith?	<u>Date, time, and location</u> TBD, <u>9 a.m. to 10 p.m. PST</u> <u>Fort Mason Bldg. 201 1st floor</u>
<u>Noticed</u> Public meeting – San Francisco ⁵	GOGA with assistance from EQD	<u>Date, time, and location</u> TBD, <u>4:00 to 8:00 p.m. PST</u> <u>Fort Mason Center Bldg B (?)</u>
<u>Noticed</u> Public meeting – Marin County	GOGA with assistance from EQD	<u>Date, time and location</u> TBD, <u>4:00 to 8:00 p.m. PST</u> <u>Mill Valley Community Center (?)</u>
<u>Noticed</u> Public meeting – San Mateo	GOGA with assistance from EQD	<u>Date, time and location</u> TBD, <u>4:00 to 8:00 p.m. PST</u> <u>Farallone School (?)</u>
Webinar <u>Social Media session (Webchat?) – San Francisco (hosted at PWR office)</u>	GOGA with assistance from EQD & PWR	<u>Date, time and location</u> TBD, <u>noon to 2 p.m. PST</u>
Place windmaster and A-frame posters and post visitor centers <u>MOVE UP TO DAY OF RELEASE and</u>	SPUG, Maintenance and LE	<u>Day of Release for notice of release and comment period;</u>
Other <u>M</u>meetings <u>D</u>during <u>P</u>ublic <u>R</u>review <u>P</u>period		
GOGA Business Management Partners –	Business Management; <u>Public Affairs</u>	TBD
Park Staff, volunteers, and Conservancy Staff & Board <u>ADD Staff and vol briefing before release</u>	Howard, Chris, Mike S.	<u>Within 2 weeks of release as update and to answer staff questions</u> <u>The week of document</u>
Editorial boards and individual news media (traditional and web-based)	Public Affairs, Chris Lehnertz	Throughout public comment period, with emphasis on first week
LISTENING SESSIONS/INFORMATIONAL BRIEFINGS	<u>Public Affairs, extended team</u>	<u>As requested</u>

⁵ Mike S. brings up point that 4 hours might be too long? Accept change or reject?

NEWS RELEASE 1: Release of rule for pPublic rReview and cComment-Period⁶

Golden Gate National Recreation Area Announces ~~rea~~-Release ~~ofs~~ Proposed Rule for Dog Management for Public Review and Comment

San Francisco – Golden Gate National Recreation Area (GGNRA) has ~~announced that released for public review and comments~~ the Proposed Rule for Dog Management in Golden Gate National Recreation Area (Proposed Rule) ~~is available for public review and comment. This proposed Rule-~~*The Proposed Rule is the operational reflection of the NPS preferred alternative for dog management in the 2013-14 Supplemental Draft Environmental Impact Statement for Dog Management (SEIS). It translates the regulatory aspects of the preferred alternative into a proposed rule, unique to the GGNRA. It is informed by an analysis of the comments received on the SEIS, as well as further staff review. It describes in detail where and how people will be able to enjoy the park with their dogs – on and off-leash – as well as parameters for responsible dog walking within the park.* ~~constitutes a Rule for GGNRA. It reflects the NPS preferred alternative for managing dogs in the park, and specifies where and how dogs will be permitted in 22 visitor destinations in the park.~~

The ~~Proposed~~ Rule would apply to 22 ~~prime visitor~~ locations within the park and would designate areas within these locations for on-leash and regulated off-leash dog walking. In these 22 ~~areas~~locations, places that are not designated as open to dogs would be closed to dogs, except for service animals in accordance with National Park Service regulations. ~~The Rule would modify and, in some circumstances, relax the National Park System wide pet regulations within the 22 areas of GGNRA. National pet regulations do not permit off-leash dog walking in National Park areas.~~ Dog walking in all other GGNRA areas would continue to be regulated under the National Park System-wide pet regulations ~~which do not permit dogs to be off-leash-~~

⁷"The Proposed Rule ~~will establish GGNRA as the most dog-friendly unit of the 409-unit National Park System,~~ " Said Christine Lehnertz, General Superintendent of the Golden Gate National Recreation Area. "But it does so while ~~fulfilling our mandate to protect park resources and values for future generations, and provides clear and enforceable rules, provides a variety of visitor experiences, improves visitor and employee safety, and reduces visitor conflicts,~~" Lehnertz added. ~~balances the often conflicting desires of a broad range of park users with our mandate to protect park resources," said Superintendent Chris Lehnertz. "Every group wants to enjoy many of the same locations, and we need to find a way to help that happen."~~

The park will hold public meetings ~~midway through~~during the comment period in San Mateo, San Francisco and Marin counties. Dates and locations will be announced separately.

The Proposed Rule ~~is XX pages long, and~~ will be available for public review and comment for 60 days. ~~Unlike the SEIS,~~ ~~c~~Comments ~~on the proposed rule~~ may be submitted ~~in only two ways:~~

- ~~Online through the~~ [regulations.gov website](#)⁸ ~~[Provide a link?]~~
- ~~, in-person at any of the three~~⁹ public meetings scheduled during the comment period, or ~~By~~ mail ~~addressed to the General Superintendent, at: National Park Service, Dog Management Planning, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA, 94123. (IS THIS CORRECT? Or is there an ereg mailing address?)-~~

Comments ~~will not~~cannot be accepted over the phone, by fax, or email. ~~No bulk or form letter comments will be accepted.~~

⁶ I removed the headers because the formatting was making the document difficult to read. I will re-insert when this is finalized.

⁷ This quote was projected differently by you, Mike S., and Mike Edwards. Mike Edwards' comment was: "We don't "balance" resources protection — per Barbara Goodyear. We can balance visitor interests while ensuring resource protection remains predominant. Maybe we should ask Chris about her quote?"

⁸ To confirm: PEPC will NOT be where we submit comments. I have replaced that with the regs.gov

⁹ Do we want to be this specific?

An electronic copy of the Proposed Rule, including maps of the areas subject to the rule, is available on the [Federal Register website](#). You can also request a copy of the Proposed Rule on compact disc or in printed paper from: National Park Service- GGNRA, Building 201, Fort Mason, San Francisco, CA, 94123 or by calling XXX-XXX-XXXX.¹⁰

This is an important step in completing the will conclude the 13-4 year dog management planning process at GGNRA. The National Park Service ~~intends-expects~~ to have a Final Environmental Impact Statement, a IS, a Record of Decision, and a Final Rule in place by late 2016. ~~and a final Rule guiding dog walking in place by 2016~~.¹¹

NEWS RELEASE 2: Public Informational Meetings

GOGA-Golden Gate National Recreation Area to Hold Public Meetings on Proposed Rule for Dog Walking

San Francisco – Golden Gate National Recreation Area’s ~~(GGNRA-Proposed Rule for Dog Management in Golden Gate National Recreation Area (Proposed Rule))~~, is ~~now-currently~~ open for public review and comment through January (Exact date ~~better~~). The Proposed Rule is the operational reflection of the NPS preferred alternative for dog management in the 2013-14 Supplemental Draft Environmental Impact Statement for Dog Management (SEIS). It translates the regulatory aspects of the preferred alternative into a proposed rule, unique to the GGNRA. It is informed by an analysis of the comments received on the SEIS, as well as further staff review. It describes in detail where and how people will be able to enjoy the park with their dogs – on and off-leash – as well as parameters for responsible dog walking within the park.

This proposed Rule reflects the NPS preferred alternative for managing dogs in the park, and specifies where and how dogs will be permitted in 22 visitor destinations in the park.¹²

The Proposed Rule would apply to 22 locations within the park and would designate areas within these locations for on-leash and regulated off-leash dog walking. In these 22 locations, places that are not designated as open to dogs would be closed to dogs, except for service animals in accordance with National Park Service regulations. Dog walking in all other GGNRA areas would continue to be regulated under the National Park System-wide pet regulations which do not permit dogs to be off leash

~~The Rule would apply to 22 prime visitor locations within the park and would designate areas within these locations for on-leash and regulated off-leash dog walking, and would identify areas where dogs would not be allowed. The Rule would modify and, in some circumstances, relax (in GGNRA along) the National Park Service system-wide pet regulations, which do not permit off-leash dog walking in National Park areas.~~

Three (to five)¹³ informational meetings on this proposed dog management Rule during the 60/90-day public comment period have been scheduled to give the public an opportunity to learn more about the details of the Proposed Rule and how it relates to the long-term plan for Dog Management Plan.

Public meetings are scheduled as follows:

- [DATE?] San Francisco County, Fort Mason Center, (ROOM) San Francisco, CA 94123

¹⁰ The two news releases had different information. This is a bit confusing to the public, because the info on the SEIS was on PEPC, and people commented through there. Now we will publish on the Federal register site and people will comment on regulations.gov. Are we good with this language? It'd be good to craft something to put out consistently.

¹¹ ~~Is this correct?~~

¹² ~~Mike S. requests changing all the “22” area references to “21”, and adding language about the easement at Cattle Hill. Accept or reject?~~

¹³ ~~Mike S. requests just using “three” as it’s the required amount. My preference would be to not be specific, or say “at least three...” because we’ll likely go beyond that with webinars, etc.~~

- [DATE?] Marin County, Mill Valley Community Center, (ROOM)⁴⁴ CA 94942
- [DATE?] San Mateo County, Farallone View School, San Mateo, CA 94401
- ~~Webinar hosted from PWR~~

Each meeting will run from 4:00 8:00 PM.⁴⁵ [Determine length of mtgs] Meetings will include a presentation on the Proposed Rule ~~for the Dog Management plan, and~~ opportunities to meet informally with National Park Service staff, and an opportunity for participants to ~~to~~ present ideas ~~and comments~~ to other meeting participants.

A webchat will allow those who cannot attend the public meetings to learn about and comment on the Proposed Rule. The webchat is scheduled for TBD, noon to 2 p.m. PST. [How to join?]

In addition to these meetings, NPS will be pleased to provide informational briefings on the Proposed Rule to interested organizations and community groups. Contact [name] at [phone and email contact] for more information.

The Proposed Rule is XX pages long, and will be available for public review and comment for 60 days. Unlike the SEIS, comments on the proposed rule may be submitted in only two ways:

- Online through the regulations.gov website [Provide a link?]
- By mail addressed to the General Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA, 94123. (IS THIS CORRECT? Or is there an ereg mailing address?)

~~Comments cannot be accepted over the phone, by fax, or email. The Proposed Rule will be available for public review and comment for 60 days. Comments may be submitted through the regulations.gov website⁴⁶, in person at any of the three⁴⁷ public meetings scheduled during the comment period, or by mail at: National Park Service, Dog Management Planning, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA, 94123.~~

~~Comments will **not** be accepted over the phone, by fax, or email. No bulk or form letter comments will be accepted.~~

An electronic copy of the Proposed Rule, including maps of the areas subject to the rule, is available on the Federal Register website. You can also request a copy of the Proposed Rule on compact disc or in printed paper from: National Park Service- GGNRA, Building 201, Fort Mason, San Francisco, CA, 94123 or by calling XXX-XXX-XXXX.⁴⁸

~~An electronic copy of the Proposed Rule is available on the Federal Register website. You can also request a copy of the Proposed Rule on compact disc or in printed paper from: National Park Service- GGNRA, Building 201, Fort Mason, San Francisco, CA, 94123 or by calling XXX-XXX-XXXX.⁴⁹~~

History of Dog Walking in Golden Gate National Recreation Area²⁰ [Sub language from the preface to the Proposed Rule]

~~Dog walking in some areas of GGNRA began prior to the establishment of the park, when dog walking, including off-leash dog walking, occurred informally at sites under the jurisdiction of other federal, state, or local entities or when the lands were privately owned. In the park's early years, those practices continued largely uninterrupted, despite the existence of a National Park System wide regulation that prohibited off-leash dog walking and required all pets to be on-leash or under physical restrictive control (36 C.F.R. § 2.8, promulgated in 1966) or crated, caged, restrained on-~~

⁴⁴ ~~Do we want to determine this now? Or simply say "exact location and date to be determined?"~~

⁴⁵ ~~Again, Mike S. questions whether this is too long.~~

⁴⁶ ~~To confirm: PEPC will NOT be where we submit comments. I have replaced that with the regs.gov website.~~

⁴⁷ ~~Do we want to be this specific?~~

¹⁸ ~~The two news releases had different information. This is a bit confusing to the public, because the info on the SEIS was on PEPC, and people commented through there. Now we will publish on the Federal register site and people will comment on regulations.gov. Are we good with this language? It'd be good to craft something to put out consistently.~~

⁴⁹ ~~Again, different information between the two releases. I made them consistent, but would like to double check the language, and can we determine what number to use?~~

²⁰ ~~Michael Edwards suggests removing this section altogether.~~

leash, or otherwise physically controlled at all times (36 C.F.R. § 2.15, promulgated in 1983).

In 1978, the GGNRA Citizens' Advisory Commission, which was established under the park's enabling legislation to coordinate public involvement for the park, considered and proposed a pet policy following input from park staff and the public. The policy provided general guidance on dog walking and recommended certain locations in the park for both on-leash and off-leash, or "voice control," dog walking. In 1979, the Commission recommended the pet policy to the Superintendent for adoption as a local park policy (later known as the 1979 Pet Policy). Although the NPS never promulgated this local policy as a Rule, for more than 20 years the park operated under it despite the National Park System-wide regulation prohibiting off-leash dog walking.

Since 1979, the San Francisco Bay Area population and overall use of GGNRA lands have increased, as have the number of dog walkers in the park based on park staff observation, partly due to the recent growth of the commercial dog walking industry. At the same time, the number of dog-related conflicts between park users with and without dogs has risen, including dog bites and attacks, as has the concern about the effect of uncontrolled dog behaviors on park visitor experiences. Resource concerns have also increased since 1979 as park staff gained greater knowledge of park resources and as a result of the listing of several species with habitat in areas used by dog walkers as threatened, endangered, or special-status species. The NPS has also identified other native plant and animal species that require protection under the NPS's broader conservation mandate.

Dog Management Planning and Environmental Impact Analysis

In 2002, the NPS issued an Advance Notice of Proposed Rulemaking asking for public input on whether the NPS should develop a new regulation for dog walking in GGNRA. Following review of public comments, the NPS initiated a dog management planning process under the National Environmental Policy Act of 1969 (NEPA), together with a Negotiated Rule-making process in an effort to develop a consensus-based proposed Rule. After meeting for a 16-month period, the Negotiated Special Rulemaking Committee, comprised of representative stakeholders, was unable to reach consensus on a proposed rule and elected not to extend its charter. The NPS decided to continue the dog management planning process under NEPA and its associated public involvement process and through the traditional notice and comment rulemaking process.

The NPS released the draft Dog Management Plan/Environmental Impact Statement for public comment in 2011. The resulting public comments, and the addition of a major new tract of land to the park (Rancho Corral de Tierra), prompted the NPS to issue the draft Plan/SEIS. The draft Plan/SEIS was open for public comment from September 6, 2013 until February 18, 2014.

Appendix 1: Key Elements of the Proposed Rule

Relationship of Proposed Rule to draft Plan/SEIS

The Proposed Rule is based on the preferred alternative (Alternative F) described in the Supplemental Draft Plan/SEIS, with some modifications based on public comment on the SEIS and further staff review and analyses. ~~In general, these changes relate to: conditions for walking four to six dogs under an NPS permit; the adjustment of two Voice and Sight Control Areas (Crissy Airfield and upper Fort Funston); the addition of four new trail segments for on-leash dog walking and the elimination of one in sensitive habitat; clarifying definitions; and additional considerations for the Monitoring and Management Program. The Proposed Rule uses updated and corrected trail and road names that are, in some cases, different from the names used in the draft/SEIS. These changes are clearly noted in the proposed rule, and have been implemented to avoid confusion about their use.~~

The national park GGNRA locations covered by the proposed Rule are as follows by County:

Marin County: Stinson Beach, Muir Beach, Homestead Valley, Oakwood Valley, Alta Trail, Marin Headlands/Rodeo Beach & Vicinity, Marin Headlands/Rodeo Valley, and Fort Baker.

San Francisco County: Fort Mason; Crissy Field; Fort Point National Historic Site; Baker Beach; Lands End; Fort Miley; Sutro Heights Park; Ocean Beach; and Fort Funston. Lands managed by the Presidio Trust will continue to be managed in accordance with the Trust's regulations in 36 CFR Part 1001, until such time as they ~~might~~ adopt their own special regulation.

San Mateo County: Mori Point, Milagra Ridge, Sweeney Ridge, and Rancho Corral de Tierra. Cattle Hill, though not currently in NPS has been proposed ~~to be considered~~ to be managed by GGNRA under an easement, and as such is also included ~~herein~~.

Changes from the SEIS preferred alternative to the Draft Rule

- Description of conditions for walking four to six dogs under an NPS permit
- Changes to two Voice and Sight Control Areas (Crissy Airfield and upper Fort Funston)
- Addition of four new trail segments for on-leash dog walking, and the elimination of one trail segment in sensitive habitat
- Addition of clarifying definitions
- Additional considerations for the Monitoring and Management Program
- Updated and corrected trail and road names that are, in some cases, different from the names used in the SEIS.

Elements Common to all locations

- ~~Elements that apply to all of the locations within GGNRA governed by the proposed Rule:~~
- Dog walking would be prohibited except in the specific areas or on the trails identified in the proposed Rule.
- Dog walking would not be allowed off-trail, in campgrounds, on designated swimming beaches, on informal (aka, "social") trails, in public buildings, or in any area not designated by the proposed Rule as open to dogs.
- Dog walking on-leash would be allowed in parking lots, on sidewalks, and on shoulders of paved, public roads.
- All dogs would be required to have a current rabies vaccination and be licensed and tagged in accordance with applicable ordinances of the county where the dog's owner resides.
- Each dog walker would be required to have the dog owner's name, home address, and phone number available for each dog walked and must provide this information upon request to any person authorized to enforce the regulation.
- ~~No more than three dogs may be walked per dog walker at one time without a permit. No more than six dogs may be walked per dog walker at any one time.~~
- Service animals accompanying a person with a disability would be allowed in the park according to National

Park System-wide regulations.

- Informal trails ~~are not official trails and therefore~~ are not listed in the proposed Rule and would be closed to dog walking.
- Dog walking areas would be delineated and marked. ~~Standard-I~~ Landscape design elements (e.g. vegetative barriers, fencing, signage, landscape contours, paths, etc.) may be installed to aid differentiation of dog walking areas provided that wildlife movement is maintained. Landscape design elements may also be utilized to protect restoration areas, delineate areas that require closure or separation for safety purposes, to reduce user conflicts, or to address other dog management needs.
- ~~A person walking four to six dogs at one time would be required to have special park use permit issued by the NPS.~~
- ~~Permits would specify the areas, times and conditions under which this activity may occur.~~
- ~~nNo more than six dogs may be walked per dog walker at any one time.~~
- ~~No more than three dogs may be walked per dog walker without an NPS special use permit, for which there will be a fee; permits would specify the areas, times and conditions under which this activity may occur, and would be required to be displayed.~~
- ~~Display of the NPS permit identification card by the permitted dog walker would be required at all times when the permittee is walking four to six dogs in GGNRA.~~
- ~~All p~~ermits would require proof of liability insurance and approved dog-handling training through existing regionally or nationally-accredited training courses, ~~offered by organizations approved by the local county jurisdiction in which the activity will occur, and as accepted by the superintendent. A list of such courses can be obtained through the local county jurisdiction for that county in which the dog walking permit is being requested. A list of courses accepted by the superintendent will be posted on the park's website.~~
- ~~The NPS intends to recover the costs of administering the special use permit program under 54 U.S.C. 103104. In order to obtain a special use permit to walk more than three dogs at one time, the proposed Rule would require dog walkers to pay a permit fee to allow the NPS to recover these costs.~~

Monitoring-Based Management Program

~~[NEED A SUCCINCT DESCRIPTION OF THIS or DELETE]~~ All areas open to dog walking, including Voice and Sight-Control Areas, would be subject to a Monitoring-Based Management Program to monitor compliance with NPS regulations and ensure protection of park resources, visitors, and staff. This program would include regular monitoring and recording of noncompliance with the proposed Rule, including behavior that meets the definition of an uncontrolled dog or an unattended dog, dog walking in prohibited areas, and off-leash dog walking in areas where leashes are required. The program would also monitor and record dog-related violations of other NPS regulations, such as:

- Vegetation damage (36 C.F.R. § 2.1(a)(1)(ii)).
- Wildlife disturbance (36 C.F.R. § 2.2(a)(2)).
- Disturbance to threatened or endangered species (36 C.F.R. § 2.2(a)(2), 50 C.F.R. Part 17).
- Violation of areas closed to the public or to dogs (36 C.F.R. § 1.5(f)).
- Hazardous conditions (e.g., aggressive behavior, dog rescues) (36 C.F.R. § 2.34(a)).
- Damage to government property (36 C.F.R. § 2.31(a)(3)).

Comment here about how monitoring will be used.²¹

National Environmental Policy Act²² ~~DELETE??~~

The preferred alternative from the draft Plan/SEIS, which this Rule proposes to implement, constitutes a major Federal action with the potential to significantly affect the quality of the human environment. We have prepared the draft Plan/SEIS in accordance with the National Environmental Policy Act of 1969. Because of their inter-relatedness, the

²¹ Howard suggested a section about monitoring here. Mike Edwards suggested we put make sure to substitute with the newest Proposed Rule narrative.

²² Michael Edwards did not feel that this section was totally accurate: his comments were that “the Proposed Rule changes the SEIS Pref’d alternative slightly,” and “Not exactly. We also consider public comments on the SEIS for both the Proposed Rule and FEIS.” He suggested removing the NEPA whole section.

draft Plan/SEIS serves as NEPA compliance for this Rule. The public comment period for the draft Plan/SEIS closed on February 18, 2014. The draft Plan/SEIS is available online at <http://parkplanning.nps.gov/goga> by clicking the link entitled “GGNRA Dog Management Plan” and then clicking “Document List.” A final Plan/FEIS will be developed after public comments on the proposed Rule have been analyzed and considered as appropriate.

Stakeholder Outreach

Contact Information for ~~Personal and Conference~~ Calls

~~Table 5: California Federal~~ Congressional Delegations

Name	Position/Organization	Phone	Email
Dianne Feinstein	US Senator		
Jennifer Duck	Chief of Staff	202 224-03841	jennifer.duck@feinstein.senate.gov
Sean Elsbernd	Local POC	415-393-0707	Sean.elsbernd@feinstein.senate.gov
Barbara Boxer	US Senator	202 224 3553	
Laura Schiller	Chief of Staff	202 224-3553	Laura_schiller@boxer.senate.gov
Joshua Quigley	Local POC	510 286-8537	Joshua_quigley@boxer.senate.gov
Nancy Pelosi	Representative		
Robert Edmondson	WASO Director	202 225-0100	Robert.edmonson@mail.house.gov
Dan Bernal	District Director	415 556-4862	Dan.bernal@mail.house.gov
Jared Huffman	Representative	202 224 5161	
Jerry Callaway	District Director	415 258-9657	Jenny.callaway@mail.house.gov
Jackie Speier	Representative	202 225 3531	
Katrina Rill	District Contact	650 342-0300	Katrina.rill@mail.house.gov
Brian Perkins	District Director	650 342-0300	Brian.perkins@mail.house.gov

~~Table 7: Cooperating Local Elected Officials and Agency Representatives to Contact~~

Name	Cooperating Agency	Position/Organization	Phone	Email
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SF Parks and Rec				
San Mateo County Parks				
Marin County Parks and Open Space				
California State Parks				
EPA				
SF Supervisors: Eric Mar, Katy Tang, Norman Yee, Julie				
SF Mayor Lee, Steve Kava				
Marin Co. Supervisors: Steve Kinsey, Kate Sears				
San Mateo Co. Supervisors: Don Horsley				
Pacifica City Council (Christine Fitzgerald)				
CA State Assembly of Senate Members: Mark Leno				

Table 8: Press Reporters (*recommended for POSSIBLE individual outreach)

Name	Organization	Specialty	Phone	Email
*Felicity Barringer	NY Times	Environmental reporter	415-644-3314 o	fbarr@nytimes.com
*Robert Semple	NY Times	editorial writer (parks-env. etc.)	212-556-1832 o	semple@nytimes.com
*Julie Cart	LA Times	Environmental Reporter	213-237-7113 o 626-437-6689	julie.cart@latimes.com
*Karen Klein	LA Times	Editorial writer (interest in environment issues)	213-237-5000	karen.klein@latimes.com
*Laura Bly	USA Today	travel writer (covers NPs)	703-854-3400 (switchboard)	lbly@usatoday.com
Veronica Stoddart	USA Today	travel editor, LIFE section	703-854-6405 o	vstoddart@usatoday.com
*Glen Nishimura	USA Today	op-ed page editor,	703-854-4426 o	gnishimura@usatoday.com
*Elizabeth Shogren	NPR	environment reporter	202-513-2000 (main)	eshogren@npr.org
*Ray Ring,	High Country N	senior editor	970-527-4898 o	rayring@hcn.org
*Kurt Repanshek	National Parks Traveler		435-645-8680 o 435-640-0829 c	kurt@nationalparkstraveler.com , kurt@kjrwrites.com
Brian Vastag,	Washington	environment reporter	202-334-7410 o	national@washpost.com
Jonathan Capehart	Washington Post	editorial writer (politics/environment)		outlook@washpost.com
LOCAL media to contact		SF Chronicle, Marin IJ, Point Reyes Light, Half Moon Bay Review, SF Examiner, Mercury (Paul Rogers)		
		NBC News		
		ABC News		
		CBS News		
		CNN		
		Fox News		
		MSNBC and MSNBC.com		
		Slate.com		
		Salon.com		
		Outside Magazine		
		Backpacker Magazine		
		Energy & Environment Daily/		
		Huffington Post		

Table 9-Local Organization and Stakeholder Representatives Reps, etc. (Chris or Howard consider for personal

Name	Position & Organization	Locale	Phone
Martha Walters	Crissy Field Dog		
Martha Walters Gary Fergus	Crissy Field Dog		
Brent Plater	Wild Equity		
Andrea Buffa David Emanuel	Save Our Recreation		
Cindy Margulis	Golden Gate Audubon Society		
Becky Evans	Sierra Club		
Sally Stephens	SF Dog Group		
Bill Bechtell Christinea	Montara Dog Group		
Neal Desai	NPCA		
Amy Meyer	People For the Parks/ Presidio		
Nona Dennis	Marin Conservation League		
Bill Robberson	SF Sailboard Club		
<u>Katie Beltrano</u>	Professional Dog Walkers		
<u>Brian Aviles</u>	Equestrians		
Maria Brown	NOAA		
	PWR/ WASO		
<u>Mia List</u>			
<u>Christine List</u>			

Public Meetings²³

Organization of Public Meetings

[MODIFY BASED ON 10/6 MTG]

Registration: Upon arrival, attendees will provide their contact information and also sign up to make a comment. Members of the public could sign up to make a comment directly to the stenographer²⁴ in a separate room during the open house periods or to make their comment in front of the public.

Open House: Begin with an open house of approximately 30 minutes with boards and appropriate staff, so that members of the public can learn about the Proposed Rule and ask questions of NPS staff.

Formal Presentation: The public would be invited into the presentation space for a 20-30 minute presentation on Proposed Rule.

Open House: Another brief open house would follow the presentation, so that people have opportunity to “digest” what they heard and revisit whether they would like to make a formal comment.

Formal Comment Period/Hearing: Finally, members of the public can make a formal comment of 2 minutes in the public setting (throughout the public meeting, members of the public can make formal comments to the stenographer in a separate room if they prefer to make a verbal comment without having to do so in the more public forum).

Webinar[SUB W LIVE WEBCHAT]

Introductions: After members of the public have signed on to the webinar, the facilitators and presenters for the webinar will introduce themselves.

Presentation: The facilitator and presenters will utilize the same or a similar presentation as the public meetings to share information with the public about the Proposed Rule.

Question and Answer: Members of the public will have the opportunity to ask questions, using either the chat function of the webinar or verbally, of the webinar facilitator and presenters.

Formal Comment Period/Hearing: Members of the public can make a formal comment of 3 minutes in the public setting.

Closing: The facilitator will update the public on the upcoming timeframe for the Final EIS and how to comment after the webinar.

²³ This will need to be refined based on your experience...

²⁴ Mike Savidge commented here that these will not be official public comments so we should take those words out. However, the language in our releases says that we WILL be accepting comments at public meetings, so needs to be clarified.

Table 10: GOGA Staffing for Public Meetings

Name	Phone	Email	Supervisor
Elected Officials/ Cooperating Agency/ Stakeholder/ Reg Neg Meeting			
Howard Levitt			
Chris Lehnertz			
San Francisco Public meeting – date TBD 4:00-8:00 p.m. Fort Mason Center			
Chris Lenhertz			
Howard Levitt			
Mike Savidge			
Daphne Hatch			
Brian Aviles			
Chuck Plummer			
Michael Edwards			
Cpt. Pamela Smith, USPP			
Randy Lavoisier			
Christine Fitzgerald			
Mia Monroe			
Aaron Roth			
Alex Picavet			
Bill Merkle			
San Mateo Public meeting –date TBD , 4:00-8:00 p.m. PST Farallone View School			
Chris Lenhertz			
Howard Levitt			
Mike Savidge			
Daphne Hatch			
Brian Aviles			
Chuck Plummer			
Michael Edwards			
Cpt. Pamela Smith, USPP			
Randy Lavoisier			
Christine Fitzgerald			
Mia Monroe			
Aaron Roth			
Alex Picavet			
Bill Merkle			
Marin Public meeting – date TBD, 4:00-8:00 p.m. PST Mill Valley Community Center			
Chris Lenhertz			

Howard Levitt			
Mike Savidge			
Daphne Hatch			
Brian Aviles			
Chuck Plummer			
Michael Edwards			
Cpt. Pamela Smith, USPP			
Randy Lavoisier			
Christine Fitzgerald			
Mia Monroe			
Aaron Roth			
Alex Picavet			
Bill Merkle			

Web Chat – (hosted at PWR office), GOGA with assistance from EQD & PWR date TBD noon to 2 p.m. PST			
Chris Lehnertz			
Michael Edwards			
Alex Picavet			
Daphne Hatch			
Craig Dalby/ Stephanie Burkhart			

Thumbnail

Phase I: Pre-release of Supplemental [Feb/ March 2013]

General preparation

- ✓ Complete communications strategy Howard/Alex
- ✓ Schedule and secure venues for public meetings Michael S/ Alex
- ✓ NPS and EPA NOA in Fed Register Alan S.
- ✓ Complete brochure Michael
- Develop message points Howard/Alex/Michael S/ Michael E
- ✓ Prepare FAQ Michael/Howard/Michael S
- ✓ Public meeting presentation graphics on
RULE and process NEPA Contractor NEPA contractor
- ✓ Establish website/PEPC capacity to receive comments
- ✓ Beef up park website Michael Faw
- ✓ Establish POCs for public information Howard/Alex/Michael E
- ✓ Internal Audience
- ✓ Provide briefing paper and FAQs to staff, with
media protocols, POCs, etc. Alex
- ✓ All employee meetings Alex/Michael
- ✓ Key Stakeholders
- Distribute brochure Howard
- Distribute FAQs on request Alex/ Howard
- ✓ Personal briefings for selected elected officials and
key stakeholders Howard/Chris L
- ✓ General Public
- Distribute Brochure/ newsletter- Mia Christine F.,
for distribution of copies to all our VCs
- ✓ Set up system for park availability of hard copy and
CDs of Proposed Rule Chuck
- Web dissemination of review info Michael Faw

Phase 2: Release Day [March 2013]

General Preparation

- ✓ Press Release Alex/Howard
- ✓ Web notice Michael Faw
- ✓ Assure Staffing of phone lines and distribution
of hard copies and CDs for first week Alex/Chuck /Howard
- ✓ Internal Audience/Key Stakeholders/General Public
- Distribute press release to media, internal audience
and key stakeholders Alex

Phase 3: Review period

General Preparation

- ✓ Update website Chuck P./ Alex
- ✓ Press releases on public meetings, review process Alex/Howard
- ✓ Develop traveling briefing kit
- ✓ Internal Audience
- Distribute periodic updates via newsletter or special email
messages and all employee briefings
- ✓ Key Stakeholders
- Provide briefings to selected groups Howard/ Chris/ Aaron
- Provide briefings on request by other
stakeholder groups Howard
- ✓ General Public
- Media briefing at start of review process
- Conduct 3 public meetings Howard/Alex/Michael/Michael S/ Chris L

- ✓ Cultivate media stories
 - Respond to media inquiries
 - Answer phone and mail inquiries

Alex
Alex/Howard/Chris L.
Michael/Alex

Talking Points

1. The issue of dog management at Golden Gate National Recreation Area has been around since the park was established in 1972, and inherited a number of areas which had seen off leash dog use prior to the establishment of the park.
2. As is well known, the national regulation on dog use in national parks is very restrictive, and allows dogs only in limited areas of parks, and never off leash.
3. As park visitation has grown over the years, and the number of dogs has increased substantially, the number of conflicts has increased between various user groups, all of whom prize the same key park destinations.
4. At the same time, we have learned much more about the extent and significance of the park's natural and cultural resources. This park contains an extraordinary number and variety of plant and animal species, including more rare and threatened species than all but two other of the nation's national parks. As you know, we are duty bound to assure the protection of these resources.
5. In 2003, our park sought, and was given permission, to develop a regulation that would permit off leash dog walking in certain areas of the park where that use is appropriate. Permission to develop this park-specific Rule, applicable only at Golden Gate, was given in recognition of the unique setting and circumstances of the park.
6. Recreation is at the heart of the purposes of the park. Golden Gate National Recreation Area has arguably the broadest variety of recreation activities of any park in the 408-unit National Park system. These uses include dog walking, bird watching, beach combing, hiking, walking jogging, swimming, cycling, horseback riding, hang gliding, and board sailing, to name a few. It also includes relatively new recreation activities such as orienteering and radio-operated model planes. Some of these activities conflict with others, and we are required to do what we can to reduce those conflicts.
7. People love this park and are passionate about it. The challenge for us in developing a plan to manage the important activity of dog walking is to create a plan that acknowledges and fulfills the passionate and often conflicting desires of a broad variety of park users to the best of our ability, while fulfilling our obligation to protect resources for the future – all in a way that is understandable and manageable.
8. We have been actively working to develop a dog management plan for 13 years, and the process has been among the most publically-engaged of any ever undertaken by the National Park Service. Changes in the plan in Rep Speier's district resulting from the public and agency review of the first draft plan include new off leash areas added at Fort Funston and new on-leash areas added at Mori Point and Sweeney Ridge. In addition, two areas were recommended for on-leash use at Rancho Corral de Tierra. ²⁵

²⁵ Mike Savidge feels that some of this information is incorrect and Mike Edwards was also unsure about whether we added to Fort Funston—needs scrubbing for accuracy.

QUESTIONS AND ANSWERS

Dog Management Planning

1. **Why has GOGA developed a Dog Management Plan and Proposed Rule?**

Dog management in GOGA is currently inconsistent with NPS regulations, which require that dogs be on leash wherever they are permitted in NPS areas. In addition, increased public expectations for use of the park by dog owners and other recreational visitors, as well as a growing interest awareness of the scope of the need for resource protection and restoration, have resulted in controversy and litigation, and compromised visitor and employee safety, visitor experience, and park resources. These conflicts will escalate if not addressed.

The goals of the Plan/DEIS are to:

- Provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park;
- Promote the preservation and protection of natural and cultural resources and natural processes;
- Provide a variety of visitor experiences, improve visitor and employee safety, and reduce user conflicts; and
- Maintain park resources and values for future generations.

The objectives of the Plan/DEIS include:

Visitor Experience and Safety

- Minimize conflicts related to dog use by providing a variety of safe, high-quality visitor use experiences, including areas where dogs are allowed.

Law Enforcement / Compliance with Dog Rules, and Park Operations

- Maximize dog walker compliance with clear, enforceable parameters in order to improve park operations and use of staff resources in managing dog walking.

Park Operations

- Provide adaptability and flexibility so that information gathered from monitoring can be used in future decision making based on estimated outcomes, including in new park areas.
- Ensure a safe and healthy working environment for park staff.
- Evaluate commercial dog walking, and if allowed, create and implement an enforceable policy.

Natural Resources

- Protect native wildlife and their habitat (including sensitive species and their habitat, and federally or state listed, unique, or rare species) from detrimental effects of dog use, including harassment or disturbance by dogs.
- Minimize degradation of vegetation, soil and water resources by dog use.
- Preserve opportunities for future natural resource restoration and enhancement.

Cultural Resources

- Preserve opportunities for future cultural resource restoration and enhancement.
- Protect cultural resources from the detrimental effects of dog use.

Education

- Build community support for the plan to maximize management of dog walking use.
- Increase public understanding of NPS policies.

2. **Why does Golden Gate National Recreation Area propose a Rule that differs from the regulation governing dogs in all of the other 407 units of the National Park System?**

As described in the November 2002 Federal Panel Recommendation to the General Superintendent on Proposed Special Rulemaking for Pet Management at Golden Gate National Recreation Area, GGNRA has a unique set of characteristics: the integration of properties which had historically been used for off-leash dog walking; the 1979 Citizen's Advisory Commission Pet Policy that recommended the continuation of those uses, and GGNRA's informal adoption of that policy for over 20 years; GGNRA parkland being immediately adjacent to one of the most densely populated urban centers in the United States; park management of a significant portion of the public recreational open space – particularly beaches - in San Francisco and Marin Counties, where residents rely on portions of that open space for exercise of their pets; and GGNRA locations such as certain beaches, grassy areas, and other landscaped sites that may be suitable for off-leash dog use

without causing unacceptable impacts. Because of these unique characteristics, GGNRA looked at a range of alternatives intended to provide a variety of experiences, including voice control dog walking, while protecting resources and visitor safety.

3. Many people feel that dogs should never be off-leash in a park. Why is off-leash dog walking being considered in GGNRA? Why not just ban dogs?

Off-leash dog walking is being considered in GGNRA because it has traditionally been one of the recreational opportunities allowed in specified areas of GGNRA. In most cases, the areas within GGNRA which have been used for off-leash activity were historically used for this purpose prior to being incorporated into GGNRA. As such, GGNRA management believes opportunities for off-leash activity should be evaluated in light of historical use, as well as in the context of mandates and guidelines governing recreational and related activities and resource protection in GGNRA.

NPS never considered a ban on dogs in the park. We consider dog walking, appropriately managed, to be healthy activity for many park visitors. We believe that the long dog management planning process has resulted in a Proposed Rule that allows for continued dog walking in the park, including off-leash dog walking in some areas, in a way that is consistent with wise NPS management.

4. Why not stick with the 1979 Pet Policy as the Rule, but simply enforce it more effectively?

The 1979 Pet Policy was developed at a time when the population of the Bay Area was a fraction of today's level, and the number of dogs was also a fraction of what it is today. The extent and importance of park resources was also not fully understood in 1979. The 1979 Pet Policy does not sufficiently protect park resources nor provide for the full range of appropriate visitor uses at all of the prime visitor destinations in the park.

The NPS must ensure that any Rule promulgated is consistent with applicable statutory requirements, including the National Environmental Policy Act and the Endangered Species Act. No such analysis was completed for the 1979 Pet Policy.

²⁶ Additionally, GGNRA has long been out-of-compliance with the NPS-wide regulation 2.15 requiring that dogs be either crated, confined, or otherwise controlled on a leash within national parklands. Nonetheless, we are recognizing dogwalking as an appropriate activity, within the proposed rule, as long as it is responsible and managed with off-leash in areas where its impacts can be minimized and not lead to 'unacceptable impacts.'

5. What is your evidence that there are problems with the current situation?

While only a few of the violations of the current rules on dog management result in a citation, citations for violation of dog rules constitutes a major component of law enforcement activity in many of the areas covered by the Proposed Rule. These are presented in the Supplemental Environmental Impact Statement. In addition, we have received many letters, phone calls, and emails and formal comments from visitors concerned that dogs have bitten people, chased wildlife, scared children, disrupted picnics, and generally caused problems in the park. Many visitors have complained of dog feces and urine in areas of high visitor use. Park staff have been bitten by dogs; a US Park Police horse was severely injured by an uncontrolled off-leash dog, and the rider, a US Park Police Officer, also suffered injuries in that incident.²⁷

6. Does GGNRA have site-specific studies on the impacts of dogs on wildlife or natural resources?²⁸

Our responsibility is to ensure that we act before there is an 'unacceptable impact', not after. An unacceptable impact is defined as one that, individually or cumulatively, is:

²⁶ Mike Savidge added 9 additional questions. I've either included them, sometimes with edits (noted), or added them to other questions if I felt they were redundant. I've included his original questions at the end so you can compare. This is Mike's 3rd additional question—I think it's redundant to have it on its own and included it here.

²⁷ Mike Savidge notes that he's not sure we should highlight this as it might indicate that the problem is a lack of enforcement, not uncontrolled dogs.

²⁸ This is the second of Mike S.'s additional questions. I don't know that this quite answers the question that he is asking, which I think is a reasonable one. What do you think? It'd be nice to be able to answer this in scientific terms.

- inconsistent with the park’s purposes or values, or
- impedes attainment of the desired condition of park resources, or
- creates an unsafe or unhealthful environment for visitors or employees, or
- diminishes opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values, or
- unreasonably interferes with
 - park programs or activities, or
 - an appropriate use
 - an atmosphere of peace and tranquility, or natural soundscape...
 - concessions or contractor operations or services.

Given that the level of complaints on user conflicts with dog walkers as well as violations has been substantial and ongoing (vs. isolated incidents), and given the peer reviewed, scientific studies about the impacts of dog walking on natural resources (cited in SEIS), the park is taking action to prevent ‘unacceptable impacts’ from occurring with the preferred alternative and subsequent Proposed Rule.

7. What are the major concerns associated with allowing off-leash dog walking in GGNRA?

Although the 1979 Pet Policy and current park information state that dogs off-leash in the park must be under control, the park has no legally-enforceable voice-control guidelines governing off-leash behavior, and currently many off-leash dogs are not well- controlled by their walkers. Uncontrolled, off-leash dogs create safety issues for park visitors, staff, and other dogs. Dog use of the park can negatively impact park resources, can affect access to a particular area, and are a source of conflict between those with dogs and other user groups.

8. Will the outcomes of the GGNRA dog management planning process likely serve as a precedent for other National Park units?²⁹

No. This is a process for developing a special regulation and exception only for those GGNRA areas covered under this rule that are appropriate for dog walking in the front country that will not cause an unacceptable impact on park resources and values, nor other visitor’s experiences; otherwise, other areas not specifically designated for dog walking, as well as all other park units must still adhere to 36CFR2.15, the national regulation which does not allow dogs off-leash and limits dogwalking within the national park system.

The Proposed Rule

1. What is a “Rule” for dog management?

A Rule is the specific regulation that governs an activity in a park. In the case of dog management, the Proposed Rule reflects the preferred alternative that was developed in the Supplemental Dog Management Plan/Supplemental EIS, informed by comments received on the Supplemental Plan/EIS.

2. What is included in the proposed Rule?

The Proposed Rule identifies those areas in the park where dogs can be off-leash or on-leash, and those areas of the park where dogs are not permitted. It also defines various terms that are essential to dog management, including “voice control,” and describes what dog behavior is not permitted under the Rule.

3. How does the Proposed Rule differ from/relate to the Dog Management Plan?

The Dog Management Plan that has evolved over the past 13 years describes the research and analysis of a range of alternative approaches to dog management in 22 areas of the park. The Supplemental Draft Dog Management Plan/Supplemental Environmental Impact Statement (SEIS), released for review in September 2013 was over 2000 pages long. The Proposed Rule describes where and how dogs will be able use the park under a single NPS preferred alternative. It is XX pages long. The Proposed Rule does not include environmental analysis of this alternative; that analysis was done in the Supplemental Dog Management Plan/SEIS.

²⁹ Mike Savidge’s change and comment: “Frame answer if used as we want it to be. Do not think we should go on justifying dogwalking, the creation of a special rule already does that”

4. Who developed the Proposed Rule?

Following review and analysis of the comments received on the Supplemental Dog Management Plan/SEIS, development of the Proposed Rule Plan was managed by a senior leadership team at Golden Gate National Recreation representing multiple park divisions: Natural Resources; Law Enforcement; Cultural Resources; Public Affairs; Environmental Compliance; and Administration. This team received advice and assistance from the NPS Environmental Quality Division, the Department of the Interior Solicitor's Office, and others in the Pacific West Regional Office and Washington Office.

5. Who is the decision maker for the Final Rule?

The Final Rule and Record of Decision that outlines the entire NEPA process leading to the Rule will be signed by the Regional Director of the Pacific West Region in San Francisco.

6. Does Proposed Rule address all lands within the boundary of GGNRA?

The Proposed Rule specifies dog walking in 22 sites of the approximately 20,000 acres within the GGNRA boundary that are managed by the park. It does not address lands within the park boundary managed by other agencies such as the Presidio Trust, Point Reyes National Seashore or the San Francisco Public Utility Commission.

Other GGNRA managed lands within the park boundary that are not specifically covered in this draft plan/SEIS will continue to be governed by the existing NPS regulation for dog walking, 36 CFR 2.15 [Mike – still the right cite?] which requires dogs to be kept on a leash where they are allowed.

7. How were those 22 specific areas chosen for inclusion in the plan and Rule?

These park areas were identified by the NPS as part of the parameters in discussion of dog management by the GGNRA Negotiated Rulemaking Committee for Dog Management, an initial attempt to develop a new dog walking regulation for the park with direct input from stakeholder groups. The parameters set the limits for discussion, by identifying, up front, areas that would be open to consideration for on-leash dog walking, areas open to consideration for dog walking off-leash, under voice control, and areas that would not be open to consideration for dog walking. Development of the parameters was guided by a panel of senior NPS officials who, in 2002, recommended the following to the park's General Superintendent:

“The panel concludes that off-leash dog walking in GGNRA may be appropriate in selected locations where resource impacts can be adequately mitigated and public safety incidents and public use conflicts can be appropriately managed. The panel further recommends that the park pursue both Rulemaking and comprehensive planning for pet management to address suitable locations and proper management strategies.”

An additional area, Rancho Corral de Tierra, was added in the draft plan/SEIS. That site transferred to the park when the draft plan/DEIS had already been completed. The draft plan/SEIS provides the opportunity to specifically address that new property.

8. In the Proposed Rule, how much of the park will be available to people with dogs?³⁰

Of the 7.9 miles of beaches addressed in our plan, about 2.7 miles (or 34%) will be available for dogwalkers, 2.3 miles (or 29%) of which is off-leash. 2/3 of the beaches in the park will be dog-free to protect sensitive habitat and nesting sites, and allow other user groups to have a positive beach experience. Of 140 miles of trails, 1/3 will be available for dogwalking-- or 45 miles.

NOTE³¹ removal of Wildlife Protection Area designation

³⁰ This is another of the nine new questions that Mike Savidge put in. I've edited it to be more neutral. I've included his original text at the end of this document, we can certainly revert to that if you feel like it's necessary. I feel like it is incomplete as is; these aren't arbitrary numbers, they are based on solid data. I feel like we should include that criteria here.

³¹ Mike S. provided an answer to this: “We have many wildlife protection and sensitive species areas in the park; and that area along Crissy Field is still a wildlife protection area as a sensitive habitat for snowy plovers which is recognized

Implementation and Enforcement

9. Once the Rule is final, how will it be enforced? Will additional funding/staff be allotted to the park service to enforce the Rule?

One of the objectives of the negotiated Special Rulemaking and NEPA processes is to establish dog management that is within the fiscal ability of the park to manage. As stated in the Federal Panel's recommendations to GGNRA regarding development of a management plan and Rule:

"Implementation would also depend on fiscal and operational feasibility of any operational alternative selected. Implementation would also depend on the involvement of users to support the program."

We have selected a preferred alternative in the SEIS that we believe can be implemented in a manner that is fiscally sustainable and enforceable and accomplishes the objectives of the Purpose and Need (to better manage dog walking in a manner that is safe while protecting resources and a providing a variety of park recreation experiences). Additional law enforcement will be needed certainly during the transition and following the implementation of this proposed rule, and funding will be allocated to accomplish that.

10. How are you going to monitor compliance with the Final Rule?

[Mike, Michael, Daphne] ³²

11. Will there be a phase-in of the Final Rule?

There will be a period of time in which the focus will be on education as new signage is installed and park visitors become knowledgeable about the new regulations. During this time, dog owners may still be cited for repeatedly violating Rules, harassing wildlife, disturbing plants, or creating problems with other park users.

12. Under what statute can someone be cited for violating the Final Rule?

Any of those created in 36CFR 7.97 (Special Regulation created by GGNRA) ³³

13. How much is the fine for violating the Rule? Could someone go to jail for a violation of the new regulation?

The fines start at \$125, but the actual cost will be based on the specific regulation violated. (For example, dog in no-dog area is a different violation than commercial dog walking without a permit, etc.)

14. What is the definition of voice and sight control dog walking that would be required under a new GGNRA dog walking regulation?

As defined in the Proposed Rule, voice and sight control means that dogs must be within direct eyesight of the dog walker, and that dog walkers must be able to immediately recall their dog(s) to their side so that a leash can be attached to the dog(s) collar, and shall demonstrate this ability when requested by Law Enforcement personnel. This definition is similar to other land management agencies that allow off-leash dog walking.

15. Will there be a role for stakeholders to help shape implementation of the Final Rule?

Yes. NPS will invite interested stakeholders to help develop key components of implementation, including location and language of signage, visitor education programs, design and implementation of data collection, and to directly assist in making the plan work.

16. Suggest delete: If there is not adherence to the Rule, will restrictions on dog use be tightened

17. Suggest delete: If the Rule proves successful, will the park consider relaxing restrictions on dog use?

18. How much is implementation expected to cost? Where will you get the funds?

as such by eliminating dog walking in that area." Michael Edwards says "Suggest deleting b/c it's still in the rule, just not as an official name. Also, it's kind of a red herring." So, not sure what to do.

³² Still needed, and I feel it needs to be pretty robust as it's a reasonable question that I'd hope we get asked.

³³ Mike Savidge has note to check with Chad or Barbara on this. Mike Edwards notes that this is kind of a silly question; they won't be cited under a statute, they'll be cited under the new special regulation.

Final implementation costs will depend on the final FEIS and rule adopted. The range of transitional costs, including staff time, facility improvements and monitoring will range from 1.6-2.6M a year depending on final rule over period of 3-4 years. Variables include: inclusion of existing staff costs and re-directed staff time, level of final facility improvements adopted, and finalization of the monitoring and management program. The funding will come from a variety of sources including: ONPS; Rec fees, Concessions franchise fees and dog walking permits.

19. What are the current Rules governing dog management at GGNRA?

- Currently, dog management at GGNRA varies by area and is a combination of the
- following:
- NPS federal regulation (36 CFR 2.15) — requires that dogs be on leash wherever dogwalking is permitted in an NPS area,
- GGNRA Citizen Advisory Commission’s 1979 Pet Policy — recommending off-leash dog walking in certain areas of GGNRA. This aspect of current park management is the result of the 2005 federal court decision *US v. Barley* (405 F.Supp.2d 1121 (N.D. CA 2005)),
- NPS Rule for protection of western snowy plovers on Ocean Beach and the WPA at Crissy Field (36 CFR 7.97(d)), and;
- GGNRA Compendium (compilation of park-specific Rules).

Planning and Public Involvement

20. How did the NPS elicit public input into the Dog Management Plan?

During the 13 years the park and the public have been working to develop a dog management plan for the park, NPS has undertaken one of the most robust public engagement efforts of any it has undertaken across the county. Public input opportunities have included hundreds of informal meetings held in living rooms and meeting halls throughout the Bay Area before neighborhood associations, stakeholder groups and interested public audiences. There have been dozens of formal meetings to receive comment on two iterations of the draft plan over a cumulative 10 months. There have been hundreds of television, radio, and social media reports on the dog management process. Thousands of people have submitted tens of thousands of comments, all of which were analyzed, grouped with similar comments, by categorized, and answered.

21. How did NPS consider the input of elected officials?

NPS considered the input of elected officials along with the thousands of other interested people who commented on various iterations of the Draft or Supplemental Draft Dog Management Plan. The decision is the responsibility of the NPS, and the NPS takes into account both the desires of neighboring communities and the mandate to provide for the enjoyment of park resources for the entire national.

22. How did NPS consider the thousands of public comments on the drafts – did the park make any changes as a result of public comment?

Changes were made in the SEIS preferred alternative that are reflected in the Proposed Rule. In determining which comments would amend the preferred alternative, all of the substantive comments were considered and assessed against the criteria of the dog management plan. Suggested changes that met the criteria of the plan, and clarified or improved the draft preferred alternative, were made. Where suggested changes did not meet the criteria of the plan, and did not strengthen or clarify the draft, they were not adopted.

Examples of changes that were made include: the shape of the off leash areas in upper Fort Funston to reduce possible conflicts; the off-leash area on the Crissy Field airfield moved to the central area to allow buffer zone with tidal area marsh and birds, less conflict with events and the visitor flow anticipated from parklands connection to Main post; Rancho Corral de Tierra, not considered specifically in the 2010 draft management plan was zoned for dog management in the Supplemental; four new trail segments were added at Rancho and one eliminated at FT.Baker in a sensitive habitat area. an on-leash dog area was added at Muir Beach; and an off-leash trail designation was eliminated in Oakwood Valley.

23. Since the majority of comments favored either maintaining the status quo, or providing even more off-leash dog opportunities, why did the NPS not provide for more off-leash dog opportunities between the Draft and Supplemental Draft plan?

We could find no more areas where off-leash dog walking could be permitted that met the criteria of the plan, particularly in providing for a variety of visitor experiences and protecting park resources.

24. Couldn't increased signage, education, and enforcement decrease conflicts? It is also necessary to restrict use?

Like traffic at an intersection that requires rules, stop signs and lights, it is impossible to provide cop on every corner or every trail or beach. Rules are created to provide structure for interactions between different uses and between those uses and their environment. We agree that education, signage and law enforcement are necessary, but not sufficient, to avoiding unacceptable impacts. Clear, enforceable rules that reinforce responsible behaviors and that minimize the potential for conflicts and impacts are important as well.³⁴

25. Why did you eliminate from consideration some possible solutions like timed use, or the Boulder Green Tag program?

Colorado Open Space and Mountain Park is a county park with a different mission than the NPS. Those aspects of the Boulder Green Tag Program that become successful may still be implemented for off-leash areas as part of an educational or training component. However, the Boulder Green Tag Program has also undergone many changes in Boulder from the time it was initially proposed ten years ago. The NPS is seeking all best practices, and will consider any successes in furthering its mission. Timed use is not a simple solution, and poses its own problems including public confusion, operational difficulties for enforcement, and time of day conflicts amongst user groups and with wildlife (who prefer the mornings and evenings).

26. Why didn't you propose even one off leash area in San Mateo County – are the circumstances different from the other counties of the park?

We did look closely at San Mateo lands. First, there should be recognition that off-leash is illegal in San Mateo county by county ordinance for public lands, except where it is enclosed in fenced private or commercial properties. There is also the issue that GGNRA does not have open space and beaches in San Mateo as it does further north, so that trails constitute the majority of access area for national parklands; and, the impact of off-leash dogs on trails increases impacts on natural resources while creating increasing law enforcement difficulties.

27. Why is there no commercial dog walking in San Mateo county?

San Mateo County is more restrictive than NPS currently in its no off-leash regulations; and, it does not acknowledge nor license commercial dog walking currently. On NPS lands, walking 1-3 dogs for compensation does not require a permit. Walking more than that would authorize an increase in traffic and visitor flow that local neighbors do not support; and, commercial dogwalking is not common activity there, nor one we would subsequently encourage as it is not NPS mission activity.

28. Many feel that commercial dog walking is in no way a purpose of the park. Why are you allowing commercial dog walking in the park at all?

Feel free to officially comment on that. We recognize that it is a contentious issue; however, it is within the authority of the NPS to provide for business uses in the park, under 36CFR5.3, and that is being proposed in this rule with permit conditions that allow for the park to avoid any unacceptable impacts as a result.

³⁴ I don't think this is answering the question, exactly, or maybe I'm not sure what it's try to ask. Seems like maybe the answer should include something along the lines of, yes, all these things are necessary, but there are also some instances where dogs (or off-leash dogs) aren't appropriate, including in sensitive nesting and habitat areas, on multiple-use trails, and in some cases simply in some places where we are obligated to protect other user's experiences—birders, families with kids, equestrians, bikers, etc.

29. Won't this Proposed Rule result in an increase in the number of dogs in parks in neighboring jurisdictions, such as the City of San Francisco?

Because most current visitors were reluctant to speculate on what they might do if the Rules change in the GGNRA when the park surveyed them in 2013, it has been difficult to forecast with accuracy what the displacement effect might be. Nevertheless, NPS characterized the potential impacts are moderate in the Supplement Draft Plan/SEIS, assuming there might be some displacement. The same difficulty and unpredictability applies to efforts by neighboring jurisdictions, such as the City and County of San Francisco, which is undertaking its own efforts to identify natural areas that might reduce the amount of area with the city available for off-leash dog use. Thus far, San Francisco has not forecast any impacts of displacement on GGNRA parklands from their actions. Like GGNRA, every park agency in the region is struggling to identify areas for dogs, while still accommodating the needs of the full spectrum of park visitors. SF rec and parks is a local county park, whose mission is to support local rec needs, while GGNRA is a national park where when conflicts between conservation and enjoyment arise, conservation must predominate with a different mission.

30. Why are no dogs permitted in the less developed areas of the park such as the trails in the Marin Headlands 'backcountry,' even on leash?

[Mike, Daphne]³⁵

31. I've read that dog feces degrade water quality. How will the Proposed Rule protect stream water quality in the park?

There have been studies by EPA, among others, that conclude dog feces is a serious contaminant in certain streams that are sources of drinking water. While only one stream in the park is a direct source of drinking water - Lobos Creek in the Presidio – the Proposed Rule will keep dogs out of park streams where their waste can also degrade water quality and effect wildlife.³⁶

32. What are the economic impacts of this Proposed Rule?

[Mike, Michael]

33. Was there an advocate for recreation involved in the development of the dog management plan and Rule?

Many of the park staff who participated in the discussions on the plan and Rule come from backgrounds other than natural or cultural resource management. All staff involved in these discussions used the goals of the planning process as the template for considering use designations – including the goal of providing a variety of visitor experiences. These visitor experiences are all recreational - whether dog walking, bike riding, surfing, horse riding, hiking, jogging, birdwatching, picnicking, sunbathing, or any of the hundreds of other ways people enjoy recreating the park.

34. How will the various areas designated for off-leash or on-leash be effectively separated from areas where dogs are not permitted?

Landscape design elements will be researched to identify a range of options for clearly-delineated areas with separations that do not preclude wildlife, but signal different use areas and support safe visitor experiences. And we will be looking for more public input in workshops on that post rule. This could include vegetative barriers where feasible and/or landscape forms or fencing. Additionally, new signage will be installed to further define the uses in adjoining areas.

35. GGNRA is a national recreation area. Do national recreation areas have different management policies than national parks?

No. All units of the National Park System are guided by the same NPS Management Policies, regardless of title. Congress amended the 1916 NPS Organic Act in 1970 to make clear that it must manage all units of the National Park Service to the same preservation standard. See 16 U.S.C. §1 (1916),³⁷ and its amendment 16 U.S.C. §1a-1 (1970) below.

³⁵ Still needed.

³⁶ Michael Edwards recommends that we use the language from the SEIS if this is addressed in here at all as water quality was considered but dismissed in the SEIS.

³⁷ Does this need to be updated to 54 U.S.C?

§ 1. Service created; director; other employees

There is created in the Department of the Interior a service to be called the National Park Service, which shall be under the charge of a director, who shall be appointed by the President, by and with the advice and consent of the Senate. The Director shall have substantial experience and demonstrated competence in land management and natural or cultural resource conservation. The Director shall select two Deputy Directors. The first Deputy Director shall have responsibility for National Park Service operations, and the second Deputy Director shall have responsibility for other programs assigned to the National Park Service. The service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified, except such as are under the jurisdiction of the Secretary of the Army, as provided by law, by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

§ 1a-1. National Park System: administration; declaration of findings and purpose

Congress declares that the 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, its territories and island possessions; that these areas, though distinct in character, are united through their inter-related purposes and resources into one national park system as cumulative expressions of a single national heritage; that, individually and collectively, these areas derive increased national dignity and recognition of their superb environmental quality through their inclusion jointly with each other in one national park system preserved and managed for the benefit and inspiration of all the people of the United States; and that it is the purpose of this Act to include all such areas in the System and to clarify the authorities applicable to the system. Congress further reaffirms, declares, and directs that the promotion and regulation of the various areas of the National Park System, as defined in section 1c of this title, shall be consistent with and founded in the purpose established by section 1 of this title (above), to the common benefit of all the people of the United States. The authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress.

36. How does the Dog Management Plan/DEIS process relate to off-leash dog management initiatives in the City of San Francisco and other public land management agencies adjacent to GGNRA?

Similar issues have been or are being addressed by the City of San Francisco, as well as other local agencies with lands adjacent to GGNRA. Because GGNRA is a unit of the National Park Service, however, the uses, decision making processes, policies and regulations associated with GGNRA must comply with federal guidelines and NPS statutory requirements, including the NPS Organic Act's preservation mandate. However, during the development of the Dog Management Plan/DEIS for GGNRA, the NPS attempted to offer alternatives that are consistent, wherever possible, with the policies of adjacent public land managing agencies.

37. How are the needs of people with disabilities reflected in the Proposed Rule?

By provision of safe, accessible on-leash separations with off-leash areas in the most popular areas at Funston and Crissy Field, and in off-leash areas, such as Crissy Field that can be accessed by beach wheelchairs.

38. Did the 2014 General Management Plan drive the selection of the NPS preferred alternative in the Dog Management Plan?

No.

39. Where is the science supporting limits on dog use?

The numerous peer-reviewed documents supporting the analysis of the impact of dog use of the park are listed and cited in the Supplement Dog Management Plan/SEIS.

40. How long has the planning effort been underway?

An Advanced Notice of Proposed Rulemaking was issued in 2002. Planning for dog management has been

underway throughout the intervening 13 years.

41. **How much has the planning/Rulemaking effort cost?**³⁸

How to Comment

42. Will the public be able to comment on the new regulation before it is final?

Yes. A Notice of Proposed Rulemaking with the substance of the Proposed Rule will be published in the Federal Register for public comment; the anticipated date for publication is January 2016. After consideration of the comments, and after publication of the final Plan/EIS and Record of Decision, the NPS will publish a Final Rule. This is anticipated in late 2016.

43. Where can I get the Proposed Rule and how can I comment?

The Proposed Rule is available for review and comment for 60 days – XXX=XXX. Visit regulations.gov to review³⁹ and comment on the Proposed Rule online. To have a copy of the Proposed Rule mailed to you, please call XXX XXX-XXXX. Copies of the Proposed Rule may also be picked up in person at Golden Gate National Recreation Area headquarters, Building 201, Upper Fort Mason, San Francisco (Bay and Franklin Streets).

Comments may be submitted:

- Online at regulations.gov
- By mailing comments to Christine Lehnertz, General Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123-0022.⁴⁰

Comments will not be accepted by fax, email, or in any other way than those specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted

44. Will there be public meetings on the Proposed Rule? Will there be an opportunity for attendees to state their concerns/comments to others at the meeting?

There will be three formal public meetings – one in each of the three counties in which the park is located. These are set for X, X and X. At these meetings, there will be opportunities for the public to speak directly to park staff about their concerns on the Proposed Rule, as well as address others in a safe climate where all feel welcome to express their viewpoints.

45. If I can't attend one of the public meetings, will I have a chance to hear a presentation on the content of the Proposed Rule?

Yes, we will hold several informational briefings on the Proposed Rule in locations in each county of the park. We will also offer a live webchat about the Proposed Rule during the comment period, at which the Proposed Rule will be presented, and participants will be able to ask questions. We will not be able to take formal comments through the webinar, but participants can submit comments online at the regulations.gov, and via US Mail.

What's Next

46. What comes next in the process? When will the Final Rule be released?

Public comments on the Proposed Rule will be analyzed, and a Final Rule and Final Dog Management Plan/EIS will be prepared. These will be released along with a Record of Decision, which is a description of the rationale behind the Final Rule.

A Final Rule for dog walking in GGNRA is anticipated to be published in the Federal Register in the late summer or early fall of 2016. The Final Rule would become effective upon publication in the Federal Register.

³⁸ Michael Edwards has suggested that this should be removed.

³⁹ The Rule will actually be published in the Federal Register—can it be reviewed on regulations.gov? This goes back to the news releases in the “how to review and comment” sections. Needs to be consistent.

⁴⁰ Once again, this is slightly different than what's listed in the news release.

Mike Savidge's additional questions:

1. Why is GGNRA reducing dogwalking to less than 1% of its lands.

Of 7.9 miles of beaches, addressed in our plan, we are making 2.7 miles (or 34%) available to dogwalking, 2.3 miles (or 29%) of which is off-leash. That leaves 2/3 of the beaches where both visitors and shorebirds do not have to fear dogs chasing, threatening or disturbing them. Of 140 miles of trails, again 1/3 will be available for dogwalking or 45 miles.

2. GGNRA does not have site specific studies to demonstrate the impacts of dogs on wildlife or natural resources.

Our responsibility is to ensure that we act before there is an 'unacceptable impact', not after. An unacceptable impact is defined as one that, individually or cumulatively, is:

- *inconsistent with the park's purposes or values, or
- *impedes attainment of the desired condition of park resources, or
- *creates an unsafe or unhealthful environment for visitors or employees, or
- *diminishes opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values, or
- *unreasonably interferes with
 - park programs or activities, or
 - an appropriate use
 - an atmosphere of peace and tranquility, or natural soundscape...
 - concessions or contractor operations or services.

Given that the level of complaints on user conflicts with dog walkers as well as violations has been substantial and ongoing (vs. isolated incidents), and given the peer reviewed, scientific studies about the impacts of dog walking on natural resources (cited in SEIS), the park is taking action to prevent 'unacceptable impacts' from occurring with the preferred alternative and subsequent proposed rule.

3. GGNRA is biased against dog walkers and unfairly restricting that activity.

GGNRA has long been out-of-compliance with the NPS-wide regulation 2.15 requiring that dogs be either crated, confined or otherwise controlled on a leash within national parklands. Nonetheless, we are recognizing dogwalking as an appropriate activity, within the proposed rule, as long as it is responsible and managed with off-leash in areas where its impacts can be minimized and not lead to 'unacceptable impacts.' See above # 1 response.

4. Why is there no off-leash areas in San Mateo? ⁴¹

San Mateo lands, as a recent addition, were not subject to the 2005 court order and '79 Pet Policy, and therefore subject rather to the 2.15 NPS-wide regulation. With San Mateo county, dogs are not allowed off-leash on public lands or in public spaces as a county ordinance, only in privately or commercially-enclosed areas. Also, from local community comment, it was evident that neighbors did not want to attract 'outsiders' and the traffic and visitation to adjacent park areas with such a public use. Nevertheless, many areas were evaluated including a site in Montara across from Tamarind Street, Flat Top, a site near El Granada, as well as some parcels along the highway, all dismissed as a result of sensitive species or local opposition. Instead, we have been working with the regional and county agencies to get them to consider their more local county needs.

5. Why is there no commercial dog walking in San Mateo county?

San Mateo county is more restrictive than NPS currently in its no off-leash regulations; and, it does not acknowledge nor license commercial dog walking currently. On NPS lands, walking 1-3 dogs for compensation

⁴¹ Is this not redundant to question #25. Should we substitute this text for that answer?

does not require a permit. Walking more than that would authorize an increase in traffic and visitor flow that local neighbors do not support;and, commercial dogwalking is not common activity there, nor one we would subsequently encourage as it is not NPS mission activity.

6. Just provide education, signage and law enforcement, punishing those who cause problems.

Like traffic at an intersection that requires rules, stop signs and lights, it is impossible to provide cop on every corner or every trail or beach. Rules are created to provide structure for interactions between different uses and between those uses and their environment. We agree that education, signage and law enforcement are necessary, but not sufficient, to avoiding unacceptable impacts. Clear, enforceable rules that reinforce responsible behaviors and that minimize the potential for conflicts and impacts are important as well.

7. There are not enough lands in local area for dogs and dog walking if GGNRA further restricts those activities.

With no factual inventory of dogs in each county, it is difficult to ground truth this. Our mission, in contrast to local counties, is first to protect and preserve the natural, cultural and scenic resources for now and future generations to enjoy and be inspired by. And then, to ensure a quality visitor experience for all(including the vulnerable in society-children, elderly, disabled, etc.) without worrying about an encounter with a domestic animal. Whenever conservation and enjoyment conflict, conservation must always predominate. So, we must ask: Is it the mission of the NPS to provide increasingly-crowded, national parklands to everyone who chooses to own a dog in an urban area? We are happy to work with the region and counties in understanding the true needs better. Perhaps, a first step is to get all dogs licensed so that each county can truly assess their county needs to be addressed.⁴²

8. You are eliminating loop experiences and should allow off-leash on fire roads.

Our responsibility is to provide a variety of experiences and that includes dog-free experiences that cannot be done often without changing use on 1 or 2 trail segments in a trail network. And one of the principals applied throughout the plan is also eliminating dogs on trails thru sensitive habitat. These both can affect whether a loop experience in a nearby area for dog walkers can be maintained as such.

Dogs off-leash have been found to impact native and sensitive species off trail no matter how wide the trail because dogs follow scents. And, we cannot patrol every trail every day to ensure we avoid these impacts.⁴³

9. You will be displacing CDWs and more dogs onto local county parks that are already crowded.⁴⁴

We are not eliminating off-leash, far from it. It is true some who want to walk more than 6 dogs may go elsewhere. It is also true that they may continue to walk in GGNRA with 6 dogs which is more of a regional and national norm because it is difficult to control more and have a quality dogwalking experience for both the walker and those experiencing large packs of dogs when visiting with their own dog.

MODIFY AND CONSIDER AS AN APPENDIX, OR DELETE:

History of Dog Walking in Golden Gate National Recreation Area⁴⁵
[Sub language from the preface to the Proposed Rule]

Dog walking in some areas of GGNRA began prior to the establishment of the park, when dog walking, including off-leash dog walking, occurred informally at sites under the jurisdiction of other federal, state, or local entities or when the lands were privately owned. In the park's early years, those practices continued largely uninterrupted, despite the

⁴² I feel that this is addressed in #8, as long as we make it more complete to include our criteria for decision-making. This isn't arbitrary, and I'm assuming we've been transparent about the criteria we have used (by mandate) to come up with this plan.

⁴³ Again, I feel like this could be consolidated into #8 with a solid understanding of criteria.

⁴⁴ Is this redundant with question #29? Should we substitute/ refine text?

⁴⁵ Michael Edwards suggests removing this section altogether.

existence of a National Park System-wide regulation that prohibited off-leash dog walking and required all pets to be on-leash or under physical restrictive control (36 C.F.R § 2.8, promulgated in 1966) or crated, caged, restrained on-leash, or otherwise physically controlled at all times (36 C.F.R. § 2.15, promulgated in 1983).

In 1978, the GGNRA Citizens' Advisory Commission, which was established under the park's enabling legislation to coordinate public involvement for the park, considered and proposed a pet policy following input from park staff and the public. The policy provided general guidance on dog walking and recommended certain locations in the park for both on-leash and off-leash, or "voice control," dog walking. In 1979, the Commission recommended the pet policy to the Superintendent for adoption as a local park policy (later known as the 1979 Pet Policy). Although the NPS never promulgated this local policy as a Rule, for more than 20 years the park operated under it despite the National Park System-wide regulation prohibiting off leash dog walking.

Since 1979, the San Francisco Bay Area population and overall use of GGNRA lands have increased, as have the number of dog walkers in the park based on park staff observation, partly due to the recent growth of the commercial dog walking industry. At the same time, the number of dog-related conflicts between park users with and without dogs has risen, including dog bites and attacks, as has the concern about the effect of uncontrolled dog behaviors on park visitor experiences. Resource concerns have also increased since 1979 as park staff gained greater knowledge of park resources and as a result of the listing of several species with habitat in areas used by dog walkers as threatened, endangered, or special-status species. The NPS has also identified other native plant and animal species that require protection under the NPS's broader conservation mandate.

Dog Management Planning and Environmental Impact Analysis

In 2002, the NPS issued an Advance Notice of Proposed Rulemaking asking for public input on whether the NPS should develop a new regulation for dog walking in GGNRA. Following review of public comments, the NPS initiated a dog management planning process under the National Environmental Policy Act of 1969 (NEPA), together with a Negotiated Rule making process in an effort to develop a consensus-based proposed Rule. After meeting for a 16 month period, the Negotiated Special Rulemaking Committee, comprised of representative stakeholders, was unable to reach consensus on a proposed rule and elected not to extend its charter. The NPS decided to continue the dog management planning process under NEPA and its associated public involvement process and through the traditional notice and comment rulemaking process.

The NPS released the draft Dog Management Plan/Environmental Impact Statement for public comment in 2011. The resulting public comments, and the addition of a major new tract of land to the park (Rancho Corral de Tierra), prompted the NPS to issue the draft Plan/SEIS. The draft Plan/SEIS was open for public comment from September 6, 2013 until February 18, 2014.

|

GGNRA Dog Management

PREAMBLE

NPS manages the GGNRA as part of the National Park System. Parks in the System are managed under the National Park Service Organic Act of 1916, the General Authorities Act of 1970, and the Redwood Amendments of 1978 which amended the General Authorities Act. As explained in NPS Management Policies 2006, these interrelated authorities express the fundamental purposes of the National Park System: to conserve park resources and values and to provide for their enjoyment by park visitors. These mandates are complemented by a statutory prohibition on the impairment of park resources and values. Park managers are directed to avoid and minimize adverse impacts to the greatest extent practicable. Where there are conflicts between conserving resources and values and providing for enjoyment of them, conservation is to be the predominant goal.

To aid in the regulation of visitor activities in national parks, the Secretary of the Interior, acting through the NPS, is to “prescribe such regulations as the Secretary considers necessary or proper for [their] use and management.”

These overall responsibilities for national park management are made specific for the GGNRA by its enabling legislation of 1972. The park was established “to preserve for public use and enjoyment certain areas . . . possessing outstanding natural historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning” . The Act also directs the Secretary of the Interior to “utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management,” and requires the NPS to “preserve the recreation area, 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.”

DRAFT

Dear Friends of GGNRA:

I am pleased to announce the National Park Service (NPS) has taken an important step forward in the process to develop a rule on dog walking in the Golden Gate National Recreation Area (GGNRA).

On February ~~???~~, the park released the Proposed Rule for Dog Management in the GGNRA, beginning a ~~crucial~~ 60-day public comment period. Feedback at this time is crucial in solidifying the final plan and final rule, expected later this year.

We are grateful that so many people visit GGNRA to enjoy a wide variety of experiences. Because the GGNRA recognizes well-managed dog walking as a healthy and popular way to recreate in your parklands, managers have been meticulous in gathering community input through a multi-step process. ~~To recap the most r~~Recent steps include:

- **Jan. 2011:** Draft Dog Management Plan/Environmental Impact Statement (EIS) is released, followed by the collection of public comment through letters, online forms, and in-person contacts at four open-house meetings
- **Sept. 2013:** After an extensive review of all comments and the implementation of key changes, a Draft Dog Management Plan/Supplemental Environmental Impact Statement (SEIS) is released, to give the public the opportunity to see how the original comments were addressed
- **Feb. 2016:** Based on the Preferred Alternative in the Draft Plan/SEIS, the Proposed Rule is released

This draft regulation would govern where and how people would be able to enjoy the park with their dogs--both on- and off-leash. If ~~ultimately~~ implemented, the rule would ~~ensure the protection of~~protect park resources and ~~provide~~ensure recreational opportunities for a wide variety of park users. For example:

- Under the Proposed Rule, the GGNRA would remain the most dog-friendly park among the ~~40910??~~ units of the National Park System and would be the only unit with areas where dogs would be permitted off-leash.
- The Proposed Rule would allow off-leash dog walking in 8 areas over 4 park locations (Suggest adding more detail about areas and locations to clarify the scope of what this means)
- Thirty-five of 85 acres at Fort Funston, the most popular dog walking spot in the park, would be off-leash area

including Fort Funston, I am pleased to announce the National Park Service (NPS) has taken an important step forward in the 14 year long process to develop a rule on dog walking the Golden Gate National Recreation Area (GGNRA) with the . Today, the NPS

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has release of the Proposed Rule for Dog Management in the GGNRA for a 60-day public comment period from February 22-April 22, 2016.

The Proposed Rule is a draft regulation based on the Preferred Alternative in the Draft Dog Management Plan/Supplemental Environmental Impact Statement (SEIS) that would govern where and how people would be able to enjoy the park with their dogs—both on and off leash. If ultimately implemented, the rule would ensure the protection of park resources and provide recreational opportunities for a wide variety of park users. Comments on the Proposed Rule, along with comments previously received on the SEIS will be used in developing the final plan and final rule which. These are expected later this year.

We at GGNRA believe that The GGNRA recognizes well-managed dog walking as a healthy and popular way to explore park lands and appropriate, activity, if managed well. Under the Proposed Rule, the GGNRA would remain the most dog friendly park in the 409-unit National Park System, designating the only opportunities for off-leash dog walking in any of the 409 units in the National Park System. OR Acknowledging the uniqueness of GGNRA, the Proposed Rule would apply only to GGNRA, and represents an exception to the regulation governing all National Park areas. Under the national regulation, dogs are not allowed off-leash, except in a few (do we know how many?) parks where hunting with dogs is permitted.

- Under the Proposed Rule, off-leash dog walking would be allowed in 8 areas over 4 park locations including Fort Funston, the most popular dog walking area in the park. Dog walking would be allowed along nearly one-third of the park's beaches, mostly off-leash. In addition,
- Forty-six miles of trails — one-third of the park's trail mileage — would be available for visitors to walk their dogs on-leash.
- Specific areas would be identified for commercial dog walking

Community input helps us prepare the park for its future. **Please join us** at one of the public meetings listed below to discuss the Proposed Rule, ask questions, and learn about the public comment and planning process.

Lower Fort Mason, Gallery 308, <i>San Francisco</i> –	March X, 2016 from 6:00-8:00pm
Mill Valley Community Center, <i>Mill Valley</i> –	March X, 2016 from 6:00-8:00pm
Ingrid B. Lacy Middle School, <i>Pacifica</i> –	March X, 2016 from 6:00-8:00pm
Golden Gate Park, xxxxxx, <i>San Francisco</i> –	March X, 2016 from 6:00-8:00pm
Farallone View Elementary School, <i>Montara</i> –	March X, 2016 from 6:00-8:00pm

In addition to the public information sessions, if your organization would like us to speak to the Proposed Rule at a members meeting, please contact Howard Levitt at 415 561-4730.

To read the Proposed Rule, please visit www.xxxxxxxxxx. If you have questions about the Proposed Rule or would like to request a hard copy, please call the Dog Management

Comment [EY1]: How would you feel about providing the dog info line here?

Information Line (415) 561-4728, email the park at goga_dogmgt@nps.gov, or send a letter to GGNRA, Dog Management Plan, Building 201 Fort Mason, SF, CA 94123.

How to Comment

Comments will be accepted [on the Proposed Rule](#) until April 22, 2016 at [www.xxxxxxx](#) or via letter to: Superintendent, GGNRA, Dog Management Plan, Building 201 Fort Mason, SF, CA 94123.

[Thank you for taking time to review this information.](#) Managing public lands requires agencies to carefully consider a broad spectrum of viewpoints. Please review the Proposed Rule and let us hear **your** thoughts ~~on it~~.

Sincerely,

Chris Lehnertz
General Superintendent

Internal Draft Deliberative

From: howandwen@(b) (6)
Subject: Editorial
Date: February 25, 2016 at 7:16 AM America/Los_Angeles
To: Lois Kazakoff lkazakoff@sfchronicle.com



Hi Lois, We appreciated the balanced approach in the editorial this morning. There was one factual error, however. There are seven areas proposed for off-leash dog walking, but Rancho Corral de Tierra in San Mateo County is not one of them. We had considered a few areas there, but did not include any in the preferred alternative of the SEIS because of the concerns we had discussed on the call. I'm sorry if I explained that in a way that was unclear. The proposed off leash area you did not mention is the north end of Ocean Beach. Again, thank you for trying to help foster reason on a sometimes overheated issue. Howard Sent from my iPhone

From: howandwen@(b) (6)

Subject: Fwd: Editorial

Date: February 25, 2016 at 7:22 AM America/Los_Angeles

To: Chris Lehnertz Chris_Lehnertz@nps.gov, Michael Savidge

Michael_J_Savidge@nps.gov, Adrienne Freeman adrienne_freeman@nps.gov, Alexandra Picavet alexandra_picavet@nps.gov



This note to Lois Kazakoff was sent from my home account. We had talked specifically about why we did not identify an off leash area in SM County. Expect a big reaction. HL

Sent from my iPhone

Begin forwarded message:

From: howandwen@(b) (6)

Date: February 25, 2016 at 7:16:50 AM PST

To: Lois Kazakoff <lkazakoff@sfchronicle.com>

Subject: Editorial

Hi Lois,

We appreciated the balanced approach in the editorial this morning. There was one factual error, however. There are seven areas proposed for off-leash dog walking, but Rancho Corral de Tierra in San Mateo County is not one of them. We had considered a few areas there, but did not include any in the preferred alternative of the SEIS because of the concerns we had discussed on the call. I'm sorry if I explained that in a way that was unclear. The proposed off leash area you did not mention is the north end of Ocean Beach.

Again, thank you for trying to help foster reason on a sometimes overheated issue.
Howard

Sent from my iPhone



Communications Plan

Public Review of Proposed Rule for Dog Management

**Golden Gate
National
Recreation Area**

December 2015

Communications Plan
Public Review of Proposed Rule for
Dog Management at
Golden Gate National Recreation Area
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Purpose and Goals of the Communication Plan

Purpose

For over 13 years, NPS had been working to develop a special rule for dog management at Golden Gate National Recreation Area (GGNRA). This process has engendered high interest among local dog walking advocates, environmental organizations, various user constituencies, and federal, state and local elected officials. California and San Francisco Bay Area media interest in this issue is high.

This Communication Plan provides information about the process and timing of activities related to release of the Proposed Rule for Dog Management for Golden Gate National Recreation Area. It also provides key messages for NPS and DOI staff to use in addressing public questions about the Proposed Rule and about dog management in general at Golden Gate National Recreation Area.

Goals

- Ensure that NPS and DOI deliver consistent messaging about a complicated issue
- Identify strategies for elected official, interested stakeholder, media and general public outreach and information
- Be proactive in communicating dog management messages

Project In Brief

- The number of visitors to GGNRA who are accompanied by dogs has increased significantly over the past decade, and as a result there is an escalating number of conflicts between park users, between dogs, between dogs and visitors, uncontrolled dogs and wildlife, and dog owners/walkers and law enforcement.
- The GGNRA currently operates under a 1979 pet policy that is “unofficial.” The policy was never formalized but has been followed for over 36 years. In 2005, the U.S. District Court ruled that the GGNRA may not enforce the existing NPS nationwide regulation (36 CFR 2.15) to the degree that it conflicts with the 1979 policy, and must instead follow the 1979 policy until the park completes NEPA and a rulemaking process to make any changes to areas covered by the 1979 policy. These changes could include a range of alternatives as identified in the SEIS. These could include adopting the national rule or promulgating a special regulation. GGNRA is going through the NEPA and rulemaking process now.
- The Proposed Rule for Dog Management in Golden Gate National Recreation Area, which would reflect the NPS preferred alternative from the Supplemental Environmental Impact Statement (SEIS) with a few minor modifications, is being released in January 2016 for 60- day public review and comment.
- The SEIS was open for public review from September 6, 2013 through February 18, 2014. It outlined the preferred alternative and five alternatives for dog walking management in 22 distinct locations within Golden Gate National Recreation Area. It included seven areas where regulated off-leash dog walking could occur, as well as areas for dogs on-leash, and places where dogs would not be permitted.
- At least three noticed public information meetings and several additional informal informational briefings would be scheduled during the comment period on the Proposed Rule in local communities in each of the three counties of the park.
- Briefings for neighboring city and county agencies and key stakeholders would also be held.
- A comprehensive media outreach campaign would be undertaken to clarify the proposal and seek broad public comment.
- Key elected officials would be briefed before and after the release of the Proposed Rule.

Talking Points

- The Proposed Rule is the operational reflection of the NPS preferred alternative from the SEIS, with a few minor modifications. It translates the regulatory aspects of the preferred alternative into a proposed rule. It describes in detail where and how people would be able to enjoy the park with their dogs – on- and off-leash – as well as parameters for responsible dog walking within the park, and where to enjoy the park as a dog-free visit.
- The document, including the preamble, is less than 40 pages long.
- When implemented, the Proposed Rule would enhance recreation by reducing conflicts between recreation users, allow visitors to select an experience that suits them, give everyone a national park experience, provide a safer place for children, protect natural and historic resources, clarify rules and delineate areas for dog use, and provide guidelines for better enforcement of dog walking rules.
- The Bay Area population has increased over 40% since 1979, and is expected to reach 9.3 million people by the year 2040. The GGNRA must plan for the future, to protect natural and cultural resources, provide safe and fun recreational experiences for all visitors, and preserve our national heritage for future generations.
- GGNRA would remain the most dog-friendly park in the National Park Service while still protecting the natural and cultural resources of the park. These actions would improve conditions that support the wide variety of recreational activities for park visitors in a safer, healthier, and cleaner environment.
- The Proposed Rule establishes seven areas of the park for off-leash dog walking, allows dogs on most park beaches, retains many trails in the park for on-leash dog use, and allows for commercial dog walking in some areas.
- The Proposed Rule would make available approximately 31% of the Park's 8.6 miles of beaches (including 27% for off-leash use) as well as 34% of park trail mileage for dog walking.
- The Proposed Rule protects endangered species and their habitats, allows for hiking and other experiences that are dog-free, and protects children, elders, and people with disabilities from aggressive dogs.
- When Golden Gate National Recreation Area was established in 1972, it inherited a number of areas which had seen off-leash dog use prior to the establishment of the park. As park visitation has grown over the years, and the number of dogs has increased substantially, the number of conflicts has increased between various user groups, many of whom want to enjoy the same areas of the park.
- GGNRA's understanding of the threats from dogs to the park's natural resources has also increased. The park contains more rare and threatened species than all but two other of the nation's national parks.
- The national regulation for pets in national parks is very protective of our nation's natural and cultural resources, and allows parks to restrict dogs to limited areas of parks. The national regulation does not allow off-leash dog walking in any National Park Service units. This proposed rule would be an exception to the national regulation.
- The process that has led to the Proposed Rule has included a tremendous amount of public dialogue, including numerous hearings, meetings, and briefings held since 2002.
- The Proposed Rule is unique to Golden Gate National Recreation Area. It acknowledges the history of dog walking in the park, recognizes well-managed dog walking as a healthy activity, and designates the only opportunities for off-leash dog walking in any of the 410 units of the national park system.

Briefing Statement

Bureau: National Park Service
Issue: Proposed Rule for Dog Management
Member: Sen. Dianne Feinstein (D-CA) , Sen. Barbara Boxer (D-CA) , Rep. Nancy Pelosi (D-CA) , Rep. Jackie Speier (D-CA) , Rep. Jared Huffman(D-CA)
Park: Golden Gate National Recreation Area(GOGA)

Key Points:

- NPS has developed a proposed rule to specify where and under what conditions dogs should be allowed in Golden Gate National Recreation Area (GOGA), including off leash. This public planning process has been underway for over 13 years.
- 36 CFR 2.15(a)(2) requires that all pets, where allowed in national parks, be crated, caged or restrained.
- The purpose of the GOGA dog management proposed rule is to provide a clear, enforceable implementation plan for dog walking in appropriate areas of the park, in a manner that protects park resources and values, and provides an enjoyable, national park experience to the public.

Background:

- The NPS manages dog walking in GOGA under a 1979 Pet Policy, an informal policy that did not go through environmental compliance. In 2005 the U.S. District Court for Northern California directed the park to follow the 1979 policy until it could complete a formal rulemaking process.
- A Draft EIS was released in 2011 for a more than four month public review process. A Supplemental EIS (SEIS) was released in 2013 for over five months of public comment. The preferred alternative proposed to allow regulated off-leash dog walking in seven park areas. Adjacent state parks do not allow off-leash dog walking.

Current Status:

- The proposed rule is based on the preferred alternative described in the SEIS with minor modifications. To the extent not modified by this proposed rule, dog walking in all other NPS-managed areas within the park would continue to be regulated under the National Park System-wide pet regulation - 36 CFR 2.15.
- In general, changes from the SEIS include: modified restrictions on walking four-to-six dogs under an NPS permit; adjustments to two voice and sight control/off-leash areas (i.e. Crissy Airfield and Fort Funston); the addition of four new trail segments for on-leash dog walking in San Mateo County and the elimination of one trail (Drown Fire Road) in Marin County for dog walking; clarifying definitions; and clarified Monitoring and Management Program actions.
- There are many vocal dog walkers who are opponents of this plan, despite the plan offering approximately one-third of the park's major (non-swimming) beaches and one-third of the trails for dog walking. The proposed rule eliminates off-leash use on all trails, except in the most popular dog walking area at Fort Funston.
- A variety of stakeholders have been active in this issue for decades, in particular the advocates for off-leash dog walking. Several groups have had meetings with DOI decision-makers, local elected officials and federal lawmakers. They will continue to be active and vocal during the upcoming public comment period.
- Stakeholders also include wildlife protection groups, disability access interests, family and children's rights groups, on-leash dog walkers and many others who recreate in GOGA.
- The park is submitting a proposed rule for surnaming and signature and expects to release a Notice of Proposed Rulemaking in early January 2016 for a 60-day public comment period. The Final EIS would be released in Summer or Fall 2016, and a Record of Decision and special regulation in Fall 2016.

Contact Person: Michael Savidge, 415-561-4725
Last Updated: December 1, 2015

Schedule of Key Events

Task:	Implemented By:	Implemented On:
Prior to release of documents		
Email blast to stakeholders alerting them to tentative schedule of release and upcoming meetings on TBD.	GOGA: Howard Levitt	November 3, 2015
Schedule and book Noticed Informational Meetings	GOGA: Howard Levitt	Early December 2015
STAFF/Internal Briefings	GOGA: Chris Lehnertz, Howard Levitt	December 2015
NPS Notice of Availability (NOA) submitted to Federal Register (for pre-publication in Federal Register Reading Room on date)	GOGA: Mike Savidge EQD: Michael Edwards	Submission Date TBD Publication Date TBD
Prepare park staff briefing sheet ADD GOGA, USPP, Presidio Trust, and Conservancy staff briefing Release minus 1 week	GOGA: Adrienne Freeman, Alex Picavet, Howard Levitt	Release, minus 4 weeks
Prepare talking points for phone calls, informational briefings	GOGA: Howard Levitt, Chris Lehnertz	Release, minus 4 weeks
Prepare general press material Prepare Op-Ed	GOGA: Howard Levitt, Adrienne Freeman, Alex Picavet,	Release, minus 4 weeks
Develop newsletter for Proposed Rule release and posters/ other materials for public meetings	EQD: Michael Edwards, GOGA: Mike Savidge, Howard Levitt	Release, minus 3 weeks
Submit Communications Plan for PWR and WASO review	GOGA: Chris Lehnertz	November 30, 2015
Newsletter for Proposed Rule public review and emailed	GOGA: Chuck Plummer (via Constant Contact)	Release, minus 2 days
Emails or personal or phone call briefings : <ul style="list-style-type: none"> • Congressional Washington & local staff from CA • delegations • Stakeholders and Agency representatives • News Media 	GOGA: Howard Levitt; PWR: Stephanie Burkhardt on Washington briefings Alex Picavet- Media	Release, minus 1 day
Day of document release (Date TBD, 2016)		
Proposed Rule Published in Federal Register; this formally begins public comment period	WASO: Russ Wilson (Office of Regulations)	Release day
Proposed Rule made available via Regulations.gov and the Federal Register	WASO: Russ Wilson	Times coordinated with actions below
GOGA press release (# 1), social media release, and publish on websites	GOGA: Alex Picavet, Howard Levitt, PWR: Craig Dalby	Release Day
GOGA Dog Management planning web page update goes live	GOGA: Craig Glassner, Chuck Plummer	Release Day
Courtesy Calls: Agency representatives, and key stakeholders	GOGA: Chris Lehnertz, Mike Savidge, Howard Levitt EQD: Michael Edwards	Release Day
Place windmaster and A-frame posters and post visitor centers and update when Noticed Meetings are set	SPUG, Maintenance and LE	Release day; updated when meetings Noticed meetings are
News Media Conference Call	GOGA: Chris Lehnertz, Howard Levitt, Alex Picavet	Release day

Schedule of Key Events (continued)

Task:	Implemented By:	Implemented On:
Personal Calls as needed to PT, Parks Conservancy, SF Rec and Park, etc.	GOGA: Chris Lehnertz, Howard Levitt	Release day
Submit Op/Ed pieces to San Francisco Chronicle, etc.	GOGA: Howard Levitt, Alex Picavet	Release day
One Week After release		
GOGA press release (#2) and social media released tweet and publish on websites about noticed public informational meetings	GOGA: Alex Picavet, Howard Levitt,	date TBD
One Month After Release		
Negotiated Rulemaking committee/major stakeholder/ County Supervisors meetings	GOGA: Chris Lehnertz, Howard Levitt, Mike Savidge EQD: Michael Edwards	Date, time, and location TBD
Noticed Public meeting – San Francisco	GOGA, with assistance from EQD	Date, time, and location TBD
Noticed Public meeting – Marin County	GOGA, with assistance from EQD	Date, time and location TBD
Noticed Public meeting – San Mateo	GOGA, with assistance from EQD	Date, time and location TBD
Social Media session (Webchat)	GOGA, with assistance from EQD & PWR	Date, time and location TBD
Other Meetings During Public Review Period		
GOGA Business Management Partners	GOGA: Business Management; Public Affairs	TBD
Park Staff, volunteers, and Conservancy Staff & Board briefing	GOGA: Howard Levitt, Chris Lehnertz, Mike Savidge	Within 2 weeks of release as update and to answer staff questions release
Editorial boards and individual news media (traditional and web-based)	GOGA: Public Affairs, Chris Lehnertz	Throughout public comment period, with emphasis on first week
Community/organization Informational Briefings	GOGA: Public Affairs, extended team	As requested

Golden Gate National Recreation Area

News Release

Date:

Contact (s):

For Immediate Release

Golden Gate National Recreation Area Announces Release of Proposed Rule for Dog Management for Public Review and Comment

San Francisco – Golden Gate National Recreation Area (GGNRA) has announced that the Proposed Rule for Dog Management in Golden Gate National Recreation Area (Proposed Rule) is available for public review and comment. The Proposed Rule is the operational reflection of the NPS preferred alternative for dog management in the 2013-14 Supplemental Draft Environmental Impact Statement for Dog Management (SEIS). It translates the regulatory aspects of the preferred alternative into a proposed rule, unique to the GGNRA. It describes in detail where and how people would be able to enjoy the park with their dogs – on and off-leash – as well as parameters for responsible dog walking within the park

The Proposed Rule would apply to 22 locations within the park and would designate areas within these locations for on-leash and regulated off-leash dog walking. In these 22 locations, places that are not designated as open to dogs would be closed to dogs, except for service animals in accordance with National Park Service regulations. Dog walking in all other federally-managed GGNRA areas would continue to be regulated under the National Park System-wide pet regulations which do not permit dogs to be off leash. State, city and county lands within the GGNRA boundary will continue to be subject to the rules of those jurisdictions.

"This Proposed Rule would establish Golden Gate National Recreation Area as the most dog-friendly unit of the entire 410-unit National Park System. It would fulfill the National Park Service's mandate to protect park resources and values for future generations, while supporting the huge variety of recreational activities visitors pursue in the park," said Christine Lehnertz, General Superintendent of the Golden Gate National Recreation Area.

"The Proposed Rule would also improve visitor, employee, and pet safety, reduce visitor conflicts, and provide clear and enforceable rules for where dogs are allowed and where visitors can choose a dog-free experience," Lehnertz added.

The park will hold public meetings during the comment period in San Mateo, San Francisco and Marin counties. Dates and locations will be announced separately.

The Proposed Rule, including a preamble, is under 40 pages long, and will be available for public review and comment for 60 days. Unlike the SEIS, comments on the proposed rule may be submitted in only two ways:

- Online through the [regulations.gov website](http://www.regulations.gov)
- By mail addressed to the General Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA, 94123.

Comments cannot be accepted over the phone, by fax, or email. Bulk comments in any format submitted on behalf of others will not be accepted. An electronic copy of the Proposed Rule, including maps of the areas subject to the rule, is available on the [Federal Register website](http://www.federalregister.gov). You can also request a copy of the Proposed Rule on compact disc or in printed paper from: National Park Service- GGNRA, Building 201, Fort Mason, San Francisco, CA, 94123 or by calling 415-561-4728.

This is an important step in completing the 13-year dog management planning process at GGNRA. The National Park Service expects to have a Final Environmental Impact Statement, a Record of Decision, and a final regulation in place by late 2016.

Golden Gate National Recreation Area

News Release

Date:

Contact (s):

For Immediate Release

Golden Gate National Recreation Area to Hold Public Meetings on Proposed Rule for Dog Walking

San Francisco – Golden Gate National Recreation Area’s Proposed Rule for Dog Management in Golden Gate National Recreation Area (Proposed Rule)), is currently open for public review and comment through **(Exact date)**. The Proposed Rule is the operational reflection of the NPS preferred alternative for dog management in the 2013-14 Supplemental Draft Environmental Impact Statement for Dog Management (SEIS). It translates the regulatory aspects of the preferred alternative into a proposed rule, unique to the GGNRA. It describes in detail where and how people would be able to enjoy the park with their dogs – on- and off-leash – as well as parameters for responsible dog walking within the park.

The Proposed Rule would apply to 22 locations within the park and would designate areas within these locations for on-leash and regulated off-leash dog walking. In these 22 locations, places that are not designated as open to dogs would be closed to dogs, except for service animals in accordance with National Park Service regulations. Dog walking in all other federally-managed GGNRA areas would continue to be regulated under the National Park System-wide pet regulation which does not permit dogs to be off leash. State, city and county lands within the GGNRA boundary will continue to be subject to the rules of those jurisdictions.

Three informational public meetings on this proposed dog management Rule have been scheduled during the 60-day public comment period to give the public an opportunity to learn more about the details of the Proposed Rule and how it relates to the future of dog management in the Golden Gate National Recreation Area. Additional informational meetings may be held during the public comment period.

Public meetings are scheduled as follows:

- [DATE?]San Francisco County, Fort Mason Center, [Address]San Francisco, CA 94123
- [DATE?]Marin County, Mill Valley Community Center, [[Address] CA 94942
- [DATE?] San Mateo County, Farallone View School, San Mateo, CA 94401

Each meeting will run from **[length TBD]** Meetings will include a presentation on the Proposed Rule, opportunities to meet informally with National Park Service staff, and an opportunity for participants to present ideas to other meeting participants.

A webchat will allow those who cannot attend the public meetings to learn about the Proposed Rule. The webchat is scheduled for TBD, noon to 2 p.m. PST. **[How to join?]**

In addition to these meetings, NPS will be pleased to provide informational briefings on the Proposed Rule to interested organizations and community groups. Please call 415 561-4728 for more information.

The Proposed Rule, including a preamble, is less than 40 pages long, and will be available for public review and comment for 60 days. Unlike the SEIS, comments on the proposed rule may be submitted in only two ways:

- Online through the [regulations.gov website](http://regulations.gov)
- By mail addressed to the General Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA, 94123.

Comments cannot be accepted over the phone, by fax, or email. Bulk comments in any submitted on behalf of others will not be accepted. An electronic copy of the Proposed Rule, including maps of the areas subject to the rule, is available on the Federal Register website. You can also request a copy of the Proposed Rule on compact disc or in printed form from: National Park Service- GGNRA, Building 201, Fort Mason, San Francisco, CA, 94123 or by calling 415-561-4728.

Frequently Asked Questions *[To accompany public facing documents, press releases, etc.]*

Golden Gate National Recreation Area Proposed Rule for Dog Management

1. What is a “Rule” for dog management?

A Rule is the specific federal regulation that governs an activity in a national park. In the case of dog management, the Proposed Rule reflects, with minor modifications, the preferred alternative that was presented in the Draft Dog Management Plan/ Supplemental Environmental Impact Statement (SEIS).

2. What is included in the Proposed Rule?

The Proposed Rule identifies those places in the park where dogs would be allowed off-leash or on-leash, and those places where dogs would not be allowed. It also defines various terms that are essential to dog management, including “voice control,” describes commercial dog walking opportunities and requirements, and outlines unacceptable dog behaviors.

3. Where can the public get the Proposed Rule and how can comments be submitted?

The Proposed Rule is available for review and comment for 60 days, through **XXXX**. Visit [regulations.gov](https://www.regulations.gov) to review and comment on the Proposed Rule online. To have a copy of the Proposed Rule mailed to you, please call 415-561-4728. Copies of the Proposed Rule may also be picked up in person at Golden Gate National Recreation Area headquarters, Building 201, Upper Fort Mason, San Francisco (Bay and Franklin Streets).

Comments may be submitted:

- Online at [regulations.gov](https://www.regulations.gov)
- By mailing comments to Christine Lehnertz, General Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123-0022.

Comments will not be accepted by fax, email, or in any other way than those specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted.

4. Were any changes made to the SEIS preferred alternative that appear in the Proposed Rule? Yes.

- Addition of conditions for walking four to six dogs under an NPS permit
- Changes to two Voice and Sight Control Areas (formerly known as Regulated Off Leash Areas, ROLAs) - Crissy Airfield and upper Fort Funston
- Addition of four new trail segments for on-leash dog walking (Rancho Corral de Tierra)
- Addition of clarifying definitions
- Clarified considerations for the Monitoring and Management Program
- Updated and corrected trail and road names. In some cases, these are different from the names used in the SEIS. These trail and road name changes have no operational impact.
- Addition of authority for the superintendent to determine whether new trails in the 22 locations would allow dogs on-leash

5. What is the Monitoring Based Management Program?

All areas open to dog walking would be subject to a Monitoring and Management Program. This program would include regular monitoring and recording of compliance with the Rule and other regulations related to impacts of dog use of the park. If the General Superintendent determines the level of compliance to be approaching unacceptable levels, then a variety of primary management actions may be taken to address noncompliance. These actions may include efforts such as additional outreach and education, increased area-specific enforcement, fine increases, and additional barriers to increase separation of areas. If primary management actions do not address the problem, secondary actions may be taken, such as short or long term closure of some areas to dog walking, additional use restrictions, or increased buffer zones.

6. What comes next in the process? When will the Final Rule be released?

Public comments on the Proposed Rule will be analyzed. Next, a Final Environmental Impact Statement (FEIS) will be prepared. After the FEIS is released (currently anticipated in Summer/Fall 2016), a Record of Decision, which includes a description of the process of the development of the Dog Management Plan and a rationale behind the final rule will be released. Finally, the final rule will be promulgated, becoming a special regulation for dog management at GGNRA upon publication in the Federal Register. Adoption of the rule is expected to occur in fall 2016.

7. Will there be public meetings on the Proposed Rule? Will there be an opportunity for attendees to make a public statement during the meetings?

There will be at least three formal public informational meetings – one in each of the three counties in which the park is located. Three of these meetings have been scheduled: X, X and X. At these meetings, there will be opportunities for the public to learn about the content of the Proposed Rule and speak directly to park staff about their concerns. There will also be an opportunity for individuals to address others at the meeting in a safe climate where all feel welcome to express their viewpoints. For comments at the meetings to be officially submitted, they must be submitted either directly to the superintendent by mail, or through regulations.gov.

8. If I can't attend one of the public meetings, will I have a chance to hear a presentation on the content of the Proposed Rule?

Yes, we will offer a live webchat about the Proposed Rule during the comment period, at which participants will be able to ask questions.

9. Why has GGNRA developed a Dog Management Plan and Proposed Rule?

In order for NPS to manage dog use in the Golden Gate National Recreation Area, it was determined by a federal judge in 2005 that the park needed to undertake a formal rulemaking process if management were to change the 1979 Pet Policy, This is an informal policy dating from 1979 which has no regulatory basis, and which is not consistent with rules governing dogs in all other NPS units. Over the years, that policy led to compromised visitor and employee safety, threats to park resources, controversy and litigation. Without a rule managing dog use, these problems would likely accelerate.

In 2002, the park began the process to develop a NEPA plan and dog walking rule for the park. The dog management and NEPA process has six objectives:

- Provide a clear, enforceable dog management policy
- Preserve and protect natural and cultural resources and natural processes
- Provide a variety of visitor experiences
- Improve visitor and employee safety
- Reduce visitor conflicts
- Maintain park resources and values for future generations.

These actions would improve conditions to support the wide variety of recreational activities that park visitors pursue, in a safer and cleaner environment, while protecting our shared natural and cultural resources for future generations.

10. In the Proposed Rule, how much of the park would be available to people with dogs?

While GGNRA is 80,000 acres in total, the NPS manages only 18,500 acres. Of the 8.6 miles of beaches, about 2.7 miles (or 31%) would be available for dogwalkers and 2.3 miles (or 29%) would be available for off-leash dog use.

Of the 137 miles of trails addressed in the SEIS, approximately 46 miles or about 34%, will be available for dog walking. By comparison, dogs are not allowed at all on neighboring California State Parks Department lands, and San Mateo County Parks lands have almost no dog walking opportunities, and none of them are off-leash.

11. What about dog access at two of the most popular locations - Fort Funston and Crissy Field?

At these two locations, the area available for dog use is substantial. At Fort Funston, of the total of 180

acres (excluding the 10 acre Bank Swallow Protection Area), approximately 95 acres are steep cliff or dense vegetation, and are not accessible for any use. Of the remaining 85 acres, the Proposed Plan includes 35 acres (41%) for off-leash dog use. In addition, most of the trails and parking lots would be available for dogs on leash. At Crissy Field, dogs will be permitted in most places. Approximately 30% of the airfield, and 40% of the beach front mileage would be available for off-leash dog use. In addition, the rest of the airfield, the East Beach picnic area, and nearly all of the trails would be open to dogs on-leash.

12. What is GGNRA doing to protect wildlife and native plants from dogs?

The park considered impacts to wildlife and native vegetation in designating areas where dogs would be permitted. Areas with known or probable sensitive wildlife or plant species were designated as off limits to dogs or for dogs only on-leash. Additionally, trails away from developed areas were designed as dog-free areas because these areas have the highest prevalence of wildlife and native plant species, and are more susceptible to disturbance and damage by dogs on or off-leash. Once a dog rule is implemented, regulations related to the impact of dog use on wildlife and plants would be monitored for compliance.

13. Would access to GGNRA recreational uses be reduced?

The Proposed Rule would affect different users in different ways. For those who want maximum access to off-leash dog walking, the rule would reduce the area available for that use. For those who avoid or do not visit an area of the park because they want a dog-free experience, the rule would increase access. Overall, the Proposed Rule would not diminish the recreation opportunities for the nearly 17 million annual visitors who use the park for a countless variety of recreation experiences.

QUESTIONS AND ANSWERS [Additional questions for NPS/DOI use only]

About the Proposed Rule

1. **How does the Proposed Rule differ from/relate to the Dog Management Plan?**

The Dog Management Plan that has evolved over the past 13 years describes the analysis of a range of alternative approaches to dog management in 22 locations of the park. The Proposed Rule describes where and how dogs would be able use the park under the NPS preferred alternative from the Supplemental Dog Management Plan/SEIS. The Proposed Rule does not include environmental analysis of this alternative; that analysis was done in the SEIS. The SEIS, released for review in September 2013, was over 2000 pages long. Including a preamble, the Proposed Rule is less than 40 pages long.

2. **Who developed the Proposed Rule?**

Development of the Proposed Rule was managed by an interdisciplinary team at Golden Gate National Recreation, with advice and assistance from the NPS Environmental Quality Division, the Department of the Interior Solicitor's Office, and others in the NPS Pacific West Regional Office and NPS Washington Office of Regulations.

3. **Who is the decision maker for the Final Rule?**

The final Rule will be reviewed by the Director of the National Park Service with final review by the Assistant Secretary of the Interior for Fish, Wildlife, and Parks. The Record of Decision that outlines the NEPA process leading to the Rule and the rationale for the decision, and which provides the authority to proceed with implementation of the Rule, will be signed by the Regional Director of the NPS Pacific West Region in San Francisco.

4. **Does the Proposed Rule address all lands within the boundary of GGNRA?**

The Proposed Rule specifies dog walking in 22 locations of the approximately 18,500 acres within the GGNRA boundary that are managed by the NPS. It does not address lands within the park boundary managed by other agencies such as the Presidio Trust, California State Parks, Point Reyes National Seashore, Marin Municipal Water District, or the San Francisco Public Utility Commission.

NPS-managed lands within the park boundary that are not in the places specifically covered in the Proposed Rule would continue to be governed by the existing NPS-wide pet regulation which requires dogs to be kept on a leash, or otherwise restrained, where they are allowed. (36 CFR 2.15)

5. **How will the Proposed Rule protect wildlife and plants?**

Approximately 69% of the beaches in the park would be dog-free to protect sensitive habitat and nesting sites, and allow others who seek a dog-free experience to enjoy a beach in this way. Dogs would not be allowed on trails away from developed areas to protect wildlife and plants from disturbance. Other areas, too, are closed to dogs in deference to plants and wildlife. Also better understanding of the rules and enhanced enforcement would also help protect natural resources.

6. **Why do the groups representing off-leash dog interests say that this is the single largest loss of access to GGNRA, and reduces dog access to less than 1% of the park?**

Off-leash dog interests have chosen to characterize the park's efforts to manage dog use as restricting recreation access in general. Dog management planning does not affect recreation access to the park in general; it is focused on one type of use – dog walking – and seeks to provide opportunities for a variety of park users and recreational activities. Additionally, some users have felt the park has not taken into account their desires nor the park's NPS mandate to protect resources for the future. The park currently manages approximately 18,500 acres of land, including some land that is inaccessible to all visitors due to steep slopes and cliffs or dense vegetation. While GGNRA is 80,000 acres in total, the NPS manages only 18,500 acres. Of the 8.6 miles of beaches, about 2.7 miles (or 31%) would be available for dogwalkers and 2.3 miles (or 29%) would be available for off-leash dog use. Of the 137 miles of trails addressed in the SEIS, approximately 46 miles or about 34%, will be available for dog walking.

Rule Implementation and Enforcement

7. Once the rule is finalized, how would it be implemented?

Education about the rule, effective signage to delineate areas for different kinds of uses, the installation of additional receptacles for dog waste, the institution of programs that emphasize appropriate dog use (like the “Bark Ranger” program at Sleeping Bear Dunes National Lakeshore), and an enhanced law enforcement effort would be initiated when the rule is implemented. We would work community members in developing many of these and other implementation elements.

8. How would the rule be enforced? Would additional funding/staff be allotted to the NPS to enforce the Rule and cover other implementation costs?

Clear rules and improved signage and education would help assure the success of the rule, and additional law enforcement would be needed during the transition and following the implementation of the rule. Implementation costs are expected to range from \$1.6-2.4 million in the early years of implementation. Among other things, this would fund parkwide signage changes; gates and other use separation measures; outreach and education staff; additional law enforcement, maintenance, and outreach and education, natural resources and other staff needed to support monitoring, signage, education and permitting. Some of these costs are expected to reduce over time, as the rule becomes better understood and compliance increases. Funding would be dedicated by NPS to accomplish these and other implementation tasks.

9. How are you going to monitor compliance with the Final Rule?

All areas open to dog walking would be subject to a Monitoring-Based Management Program. This program would include regular monitoring and recording of noncompliance with the Rule, including dog-related violations of other NPS regulations. If the General Superintendent determines the level of noncompliance to be at or approaching unacceptable levels, than a variety of actions may be taken including additional outreach and education, increased area-specific enforcement, fine increases, or additional barrier of separation of areas. If primary management actions do not address the problem, secondary actions may be taken, such as short or long term closure of some areas to dog walking; additional use restrictions; or increased buffer zones.

10. Would there be a phase-in of the Final Rule?

The rule would be in full effect immediately upon its adoption by the park. A major emphasis would be placed on education to assure understanding of the rule, but visitors would be expected to adhere to the rule, as well as other regulations concerning protection of resources and visitors.

11. How much is the fine for violating the Rule?

NPS is working with the Department of Justice on a fee schedule for violation of the rule. In general, fines would start at \$125, but may be more depending on the nature of the violation.

12. What is the definition of “voice and sight control” in the Proposed Rule?

Voice and sight control means that dogs must be within direct eyesight of the dog walker, and that dog walkers must be able to immediately recall their dog(s) to their side so that a leash can be attached to the dog(s) collar. Dog owners must be able to demonstrate this ability when requested by a law enforcement officer.

13. Would there be a role for stakeholders to help shape implementation of the Final Rule?

NPS would seek input from stakeholders during the development of key components of rule implementation, such as location and language of signage, visitor education programs, and design and implementation of data collection.

14. If there is not adherence to the Rule, would restrictions on dog use be tightened?

If the General Superintendent determines that compliance with the rules is approaching an unacceptable level, there are a number of primary and secondary actions that may be taken. Increasing restrictions on dog use of some areas is one of the secondary options.

15. If the Rule proves successful, would the park consider relaxing restrictions on dog use?

If successful, the rule would protect park resources, provide for visitor safety, and to reduce user conflicts.

The proposed rule currently lays out the preferred maximum extent of dog walking the park believes it could provide while meeting its mandates and management responsibilities.

16. What are the current rules governing dog management at GGNRA?

Currently, dog management at GGNRA varies by area, and is a combination of the following: (1) NPS federal regulation (36 CFR 2.15) — for areas not governed by the 1979 Pet Policy and new lands, requires that dogs be on leash wherever dog walking is permitted in an NPS area; (2) GGNRA Citizen Advisory Commission’s 1979 Pet Policy — recommended off-leash dog walking in certain areas of GGNRA. The park has enforced this unofficial policy locally since 1979, and was directed by a Federal District Court to continue doing so until completing a rulemaking process. See *US v. Barley* (405 F.Supp.2d 1121 (N.D. CA 2005)); (3) NPS Rule for protection of western snowy plovers on Ocean Beach and the Wildlife Protection Area at Crissy Field (36 CFR 7.97(d)) (4) Interim Compendium requirements (2014) for commercial dog walking.

One objective of the Proposed Rule is to clarify the current confusing set of rules and rulings. The Proposed Rule would cover all lands subject to the 1979 Pet Policy, plus lands in San Mateo County that were recently added to the park and not addressed by the 1979 Pet Policy. The NPS federal regulation (36.CFR 2.15) covers lands not governed by the new rule.

What’s Next?

1. What comes next in the process? When would the Final Rule be released?

Public comments on the Proposed Rule will be analyzed. Then, a Final Dog Management Plan/EIS (FEIS) would be prepared and released. After a thirty day waiting period, a Record of Decision (ROD) would be published, and would include a description of the process of the development of the Dog Management Plan, and a rationale behind the decision on dog management, pending publication of a final rule. After publication of the ROD, a final rule would be published. This is anticipated to be published - known at that point as the “Special Regulation for Dog Walking in GGNRA” - in the Federal Register - in the summer or fall of 2016. The special regulation would become effective upon publication in the Federal Register.

Dog Management Planning in General

1. Many people feel that dogs should never be off-leash in a national park, consistent with the rules governing all other of the 410 units of the National Park System. Why is off-leash dog walking being considered in GGNRA?

Golden Gate National Recreation Area has a unique set of characteristics that support consideration of off-leash dog walking in some areas of the park:

- The park includes properties which had historically been used for off-leash dog walking
- The 1979 Citizen’s Advisory Commission Pet Policy that recommended the continuation of those uses had been informally adopted for over 20 years
- GGNRA parkland is located immediately adjacent to one of the most densely populated urban centers in the United States, and many of the park’s visitors come from the nearby communities
- The park manages a significant portion of the public recreational open space – particularly beaches - in San Francisco and Marin Counties.

The Proposed Rule would allow for continued dog walking in the park, including off-leash dog walking in some areas, in a way that is consistent with NPS management policies and statutory mandates.

2. Why not stick with the 1979 Pet Policy as the Rule, but simply enforce it more effectively?

The 1979 Pet Policy, as a whole, would not meet the purpose or need of the plan, and fails to meet virtually all of the plan’s objectives, even assuming compliance, increased education and enforcement, ROLA guidelines, and a monitoring management strategy. A primary reason for this failure is the geographic scope of the 1979 Pet Policy, which opens many *entire* sites to off-leash dog walking with no restrictions on the areas of use

within the sites, including the primary dog walking areas of Fort Funston, Ocean Beach, and Crissy Field. NPS received many public comments complaining that dog use precluded their enjoyment of these and other areas. Commenters included visitors with a fear of dogs, concerned parents whose children had been playfully attacked or knocked over by dogs, picnickers whose lunches had been taken, visitors who were injured by dogs, and people with disabilities - such as visually-impaired or blind individuals with guide dogs - whose highly trained dogs had been attacked by off-leash dogs resulting in their preclusion from an area. We must provide a reasonable opportunity for visitors to have an experience free of conflict to the greatest extent possible.

3. What is your evidence that there are problems with the current situation?

As documented in the SEIS, dog rule incidents (which include both warnings and citations) constitute a major component of law enforcement activity in many of the areas covered by the Proposed Rule. However, the number and types of incidents do not adequately quantify the number of violations or estimate compliance levels because law enforcement personnel are not present everywhere violations occur, and do not issue citations for all observed incidents. The number and types of incidents vary with the level of patrol, staffing levels, and patrol priorities. In addition, GGNRA has received letters, phone calls, emails and formal comments from visitors concerned or reporting that dogs have bitten people, chased wildlife, killed other dogs, dug up plants, scared children, knocked over elderly persons, disrupted picnics, and interfered with bicyclists, joggers and walkers. Park employees and police horses have been bitten by dogs, sometimes resulting in serious injury. Park rangers have been put at risk rescuing off-leash dogs from cliff faces in the park.

4. Does GGNRA have site-specific studies on the impacts of dogs on wildlife or natural resources?

NPS relied on a number of peer-reviewed studies that documented the impact of dog walking on natural resources in other park settings, but not specifically at Golden Gate National Recreation Area. The relevant studies are cited in the SEIS.

5. Would the outcomes of the GGNRA dog management planning process likely serve as a precedent for other National Park units?

No. The rule that is instituted at Golden Gate National Recreation Area would apply only to that unit of the National Park System.

Public Involvement

1. How did NPS consider the public comments on the drafts – did the park make any changes as a result of public comment?

In determining which comments provided information that could amend any alternative all of the substantive comments were considered and assessed alongside the objectives of the dog management plan. Suggested changes that met the objectives of the plan, and clarified or improved an alternative, or analysis methodology were made. Suggested changes that did not meet the objectives of the plan, and did not strengthen or clarify one or another alternative, were not adopted.

Examples of changes that were made in the SEIS preferred alternative include:

- the shape of the off-leash areas in upper Fort Funston was changed to permit off-leash access from the upland area to the beach, and to reduce possible user conflicts;
- the off-leash area on the Crissy Field airfield was moved to the central area to allow a buffer zone for the tidal area marsh birds, less conflict with events, and the visitor flow anticipated from the New Presidio Parklands connection from the Presidio Main post;
- Rancho Corral de Tierra, not considered specifically in the 2010 DEIS, was zoned for dog management, with four new trail segments designated for on-leash use;
- at Fort Baker, a trail in a sensitive habitat area was eliminated as an on-leash location;
- an on-leash dog area was added at Muir Beach;
- an off-leash trail designation was eliminated in Oakwood Valley.

2. **Did NPS ignore the resolutions by the boards of supervisors of all three counties, as well as the written comments from other local, state, and federal elected officials that the dog management plan was too restrictive of off-leash dog walking?**

NPS carefully considered the input of elected officials at every stage of the dog management planning process, and has met with many of these elected officials to discuss concerns a number of times in the planning process. However, there are fundamental differences in management responsibilities between federal and local park and open space agencies. Golden Gate National Recreation Area is part of the 410-unit National Park System, and therefore, in addition to taking into account local elected officials' and residents' input on park management issues, NPS has the obligation to manage and protect park resources for the benefit of the people of the entire nation.

3. **Since the majority of comments favored either maintaining the status quo, or providing even more off-leash dog opportunities, why did the NPS not provide for more off-leash dog opportunities between the Draft and Supplemental EIS?**

The preferred alternative must meet the objectives of the plan, and we could find no more areas where off-leash dog walking could be permitted that met the objectives. In preparing the DEIS, starting in 2008, NPS evaluated every area within the scope of the plan and was able to identify seven areas where off-leash dog walking could occur, while meeting the plan objectives. During evaluation of the SEIS preferred alternative, we found one additional area (Fort Mason) where off-leash dog walking could occur, and one area (Oakwood Valley) where resource issues and the potential for visitor conflicts resulted in the area being designated in the rule for on-leash dog walking only.

4. **Why are there no off-leash areas in San Mateo?**

San Mateo lands, which were added to the park after 1979, are not subject to the 1979 Pet Policy, and therefore are subject to the NPS-wide regulation that requires dogs to be on-leash at all times. In San Mateo County, county ordinance specifies that dogs are not allowed off-leash on public lands or in public spaces, only in privately or commercially-enclosed areas. A small off-leash area, consistent with visitor and resource protection, is considered in two alternatives for Rancho Corral de Tierra (see table 3 of the SEIS). Additional or larger off-leash areas for the Rancho site were considered but dismissed due to resource-related concerns. A large ROLA north of the Farallone View School was considered, but the presence of habitat of a federally threatened species, the California red-legged frog, adjacent to the site and a report from the California Department of Transportation biologists that red-legged frogs were found in drainages to either side of this site eliminated this as an option since there is insufficient distance between the site and the habitat to provide a protective buffer. A proposed site in a previously disturbed area west of the intersection of Coral Reef and Sevilla Avenues in El Granada was also considered, but was found to contain wetland plant species and to have seasonal standing water. Placing any use in this area would violate Director's Order #77-1, Wetland Protection. We have been working with San Mateo County Parks Department on a regional approach to addressing the local desire for more dog areas.

5. **Why did you eliminate from consideration setting certain times of day for dogs to use certain areas?**

Timed use is not a simple solution, and poses its own problems including public confusion, difficulties for enforcement, conflicts among user groups, and threats to wildlife, which are often most active during the early morning or late afternoon periods. Timed use would apply to those walking from 4-6 dogs in some locations, however, such as restricting weekend dog walking for these users. And timed use remains an option for dog management in the future if conditions warrant, or as a mitigation measure under the monitoring-based management strategy.

6. **Many feel that commercial dog walking is in no way a purpose of the park. Why are you allowing commercial dog walking in the park at all?**

It is within the authority of the NPS to provide for business uses in the park under 54 USC 100101 *et seq.* NPS proposes to permit commercial dog walking in the park under conditions that we anticipate would not lead to unacceptable impacts.

7. **Won't this Proposed Rule result in an increase in the number of dogs in parks in neighboring jurisdictions, displacing them to locations such as the City of San Francisco parks?**

Despite a survey in 2013 by the NPS following the DEIS to assess the potential for displacement of dogs from NPS land to neighboring jurisdictions, it has been difficult to forecast with accuracy what the displacement effect might be. Nevertheless, NPS assumes there could be some displacement and characterized potential impact of displacement as "minor to moderate" in the SEIS. Please see Chapter 4 of the SEIS for additional information. NPS would work with nearby jurisdictions to identify possible impacts and develop mitigation strategies. Some neighboring park lands require dogs to be leashed. Some off-leash dog opportunities in nearby communities are in specially designed public and private "dog parks," rather than natural areas. It is possible that displacement of dogs from NPS lands to neighboring jurisdictions may not occur in significant numbers. When the rule is implemented, there would still be many miles of park beaches, trails, and significant open areas that are available for dog use. The park would continue to work with neighboring jurisdictions to monitor the impacts of displacement and look for regional solutions to support people with canine companions who live near the park.

8. **Why are no dogs permitted in the less developed areas of the park such as most of the trails in the Marin Headlands 'backcountry,' even on leash? Why are there just a few loop trails?**

The less developed areas of GGNRA are where plants and wildlife tend to be concentrated and more highly susceptible to disturbance by dogs. Also, many park visitors seek the experience of relative solitude away from developed areas of the park, and that solitude may be impacted by the presence of dogs, on- or off-leash. For these reasons, loop trails are also not considered, except for the Old Bunker Fire Road and Batteries Loop Trail in the Marin Headlands.

9. **How would the Proposed Rule protect stream water quality in the park?**

The Proposed Rule would keep off-leash dogs away from streams, therefore reducing turbidity and dog waste that can degrade water quality and affect wildlife

10. **How would the various areas designated for off-leash or on-leash be effectively separated from areas where dogs are not permitted?**

Landscape design elements would be researched to identify a range of options for clearly-delineated areas with separations that do not preclude wildlife and would allow wildlife movement, but signal different use areas and support safe visitor experiences. These could include vegetative barriers where feasible and/or landscape forms or fencing. Additionally, new signage would be installed to further define the uses in adjoining areas. We would be looking for more public input in effective area delineation when the rule is implemented.

11. **GGNRA is a national recreation area, not a national park. Why do you keep using the term "national park?"**

While there over 30 terms used to describe the 410 units of the National Park System, all are guided by the same NPS Management Policies, regardless of title. Congress amended the 1916 NPS Organic Act in 1970 and again in 1978 to make clear that NPS must manage all units of the National Park Service to the same preservation standard. We sometimes refer to Golden Gate National Recreation Area as a park, or the lands of the park as parklands, for the sake of simplicity; it does not imply that recreation is not central to the park. In fact, for the past two years, the park has welcomed more recreation use than any other national park in the system.

12. **How are the needs of people with disabilities reflected in the Proposed Rule?**

The park is continuing to work on accessibility throughout the park. For some visitors with mobility issues – wheelchair users and others – a dog-free experience is preferred, and the Proposed Rule identifies some areas where dogs would not be allowed. For others with disabilities, enjoying the park with a dog is an important recreation pursuit. Many of the on-leash areas are fully accessible, and there are some accessible points of entry to several of the proposed off-leash areas.

13. **Did the 2014 General Management Plan (GMP) drive the identification of the NPS preferred alternative in the Dog Management Plan?**

No. The Dog Management planning process preceded the GMP by several years, and there is an explicit provision in the Record of Decision on the GMP that indicates that should there be any conflicts between the GMP and the provisions of the Dog Management Plan and Rule, the provisions in the Dog Management Plan would take precedence.

14. **Where is the science supporting limits on dog use?**

Regulation of dog use in the GGRNA is based on a need to assure protection of resources, increase safety, and provide for a variety of visitor experiences. The numerous peer-reviewed documents supporting the analysis of the impact of dog use of the park are listed and cited in the SEIS. Scientific information was one of many contributing factors to proposed dog management planning.

15. **How long has the planning effort been underway?**

An Advanced Notice of Proposed Rulemaking was published in 2002. Planning for dog management has been underway throughout the intervening 13 years.

Appendix 1: Key Elements of the Proposed Rule

Relationship of Proposed Rule to SEIS

The Proposed Rule is based on the preferred alternative (Alternative F) described in the Supplemental Environmental Impact Statement (SEIS), with some minor modifications. The Proposed Rule reflects the operational elements that would be put in place to implement the preferred alternative. The NPS is seeking comments on how the preferred alternative could best be operationalized.

GGNRA locations covered by the proposed Rule

Marin County: Stinson Beach, Muir Beach, Homestead Valley, Oakwood Valley, Alta Trail, Marin Headlands/Rodeo Beach & Vicinity, Marin Headlands/Rodeo Valley, and Fort Baker.

San Francisco County: Fort Mason; Crissy Field; Fort Point National Historic Site; Baker Beach; Lands End; Fort Miley; Sutro Heights Park; Ocean Beach; Fort Funston. Lands managed by the Presidio Trust would continue to be managed in accordance with the Trust's regulations in 36 CFR Part 1001, until such time as they adopt their own special regulation.

San Mateo County: Mori Point, Milagra Ridge, Sweeney Ridge, and Rancho Corral de Tierra. Cattle Hill, though not currently in NPS has been proposed to be managed by GGNRA under an easement, and as such is also included.

Changes from the SEIS preferred alternative to the Draft Rule

- Addition of description of conditions for walking four to six dogs under an NPS permit
- Changes to two Voice and Sight Control Areas (formerly known as Regulated Off Leash Areas, ROLAs) - Crissy Airfield and upper Fort Funston
- Addition of four new trail segments for on-leash dog walking (Rancho Corral de Tierra)
- Addition of clarifying definitions
- Clarified considerations for the Monitoring and Management Program
- Updated and corrected trail and road names. In some cases, these are different from the names used in the SEIS. These trail and road name changes have no operational impact.
- Addition of authority for the superintendent to determine whether new trails in the 22 locations would allow dogs on-leash

Elements Common to all locations

- Dog walking would be prohibited except in the specific areas or on the trails identified in the proposed Rule.
- Dog walking would not be allowed off-trail, in campgrounds, on designated swimming beaches, on informal (aka, "social") trails, in public buildings, or in any area not designated by the proposed Rule as open to dogs.
- Dog walking on-leash would be allowed in parking lots, on sidewalks, and on shoulders of paved, public roads.
- All dogs would be required to have a current rabies vaccination.
- All dogs must be licensed and tagged in accordance with ordinances of the county where the owner resides.
- Each dog walker would be required to have the dog owner's name, home address, and phone number available for each dog walked and must provide this information upon request to any person authorized to enforce the regulation.
- Service animals accompanying a person with a disability would be allowed in the park according to National Park System-wide regulations.
- Informal trails are not listed in the proposed Rule and would be closed to dog walking.
- Dog walking areas would be delineated and marked. Landscape design elements (e.g. vegetative barriers, fencing, signage, landscape contours, paths, etc.) could be installed to aid differentiation of dog walking areas provided that wildlife movement is maintained. Landscape design elements could also be utilized to protect restoration areas, delineate areas that require closure or separation for safety purposes, to reduce user conflicts, or to address other dog management needs.

- No more than six dogs could be walked per dog walker at any one time.
- No more than three dogs could be walked per dog walker without an NPS special use permit, for which there would be a fee; permits would specify the areas, times and conditions under which this activity may occur, and would be required to be displayed.
- Permits would require proof of liability insurance and approved dog-handling training through existing regionally or nationally-accredited training courses.

Monitoring-Based Management Program

- All areas open to dog walking would be subject to a Monitoring-Based Management Program. This program would include regular monitoring and recording of compliance with the Rule, including dog-related violations of other NPS regulations. If the General Superintendent determines the level of compliance to be approaching unacceptable levels, than a variety of primary management actions may be taken including additional outreach and education, increased area-specific enforcement, fine increases, or additional barrier of separation of areas. If primary management actions do not address the problem, secondary actions may be taken, such as short or long term closure of some areas to dog walking; additional use restrictions; or increased buffer zones.

Appendix 2: Stakeholder Outreach

Federal Congressional Delegations			
Name	Position/Organization	Phone	Email
Dianne Feinstein	US Senator		
Jennifer Duck	Chief of Staff	202 224-03841	jennifer.duck@feinstein.senate.gov
Sean Elsbernd	Local POC	415-393-0707	Sean.elsbernd@feinstein.senate.gov
Barbara Boxer	US Senator	202 224 3553	
Laura Schiller	Chief of Staff	202 224-3553	Laura_schiller@boxer.senate.gov
Joshua Quigley	Local POC	510 286-8537	Joshua_quigley@boxer.senate.gov
Nancy Pelosi	Representative/Minority Leader		
Robert Edmondson	Washington Director	202 225-0100	Robert.edmonson@mail.house.gov
Dan Bernal	District Director	415 556-4862	Dan.bernal@mail.house.gov
Jared Huffman	Representative	202 224 5161	
Jerry Callaway	District Director	415 258-9657	Jenny.callaway@mail.house.gov
Jackie Speier	Representative	202 225 3531	
Katrina Rill	District Contact	650 342-0300	Katrina.rill@mail.house.gov
Brian Perkins	District Director	650 342-0300	Brian.perkins@mail.house.gov

Organization	Contact	Contacted By	Email
SF Parks and Rec	Phil Ginsburg; Sarah Madland	Howard Levitt	
San Mateo County Parks	Marlene Finley	Howard Levitt	
Marin County Parks and Open Space	New Director	Mia Monroe	
California State Parks	Danita Rodriguez	Howard Levitt	
EPA	TBD	Mike Savidge	
SF Supervisors: Eric Mar, Katy Tang, Norman Yee, Aaron Peskin, Scott Wiener	Supervisors or staff directors	Howard Levitt	
SF Mayor Lee, Steve Kava	Steve Kava	Christine Lehnertz	
Marin Co. Supervisors: Steve Kinsey, Kate Sears	Supervisors or staff directors	Howard Levitt	
San Mateo Co. Supervisors: Don Horsley	Supervisor Horsely	Howard Levitt	
Pacifica City Council	TBD	Christine FitzGerald	

CA State Assembly Members: Phil Ting, Mark Levine, David Chiu	TBD	Howard Levitt	
CA State Senate: Mark Leno	TBD	Howard Levitt	

Local Organization and Stakeholder Representatives

Name	Position & Organization	Contacted by	Phone
Martha Walters Gary Fergus	Crissy Field Dog	Howard Levitt	
Brent Plater	Wild Equity	Howard Levitt	
Andrea Buffa David Emanuel	Save Our Recreation	Howard Levitt	
Cindy Margulis	Golden Gate Audubon Society	Howard Levitt	
Becky Evans	Sierra Club	Howard Levitt	
Sally Stephens	SF Dog Group	Howard Levitt	
Director	SF Unified School District (@Funston)	Howard Levitt	
Bill Bechtell Christina	Montara Dog Group	Christine FitzGerald	
Neal Desai	NPCA	Howard Levitt	
Amy Meyer	People For the Parks/ Presidio	Chris Lehnertz	
Nona Dennis	Marin Conservation League	Mia Monroe	
Bill Robberson	SF Sailboard Club	Howard Levitt	
	Professional Dog Walkers	Katie Beltrano	
	Equestrians	Brian Aviles	
Maria Brown	NOAA	Chris Lehnertz	
Matt/Victor	Access 4 Bikes	Mia Monroe	
Annie Burke	Bay Area Open Space Council	Howard Levitt	
Janet McBride	Bay Area Ridge Trail Council	Mia Monroe	415-561-2595 X8
Jim Nixon	California Alpine Club	Mia Monroe	
Paul DaSilva	California Native Plant Society, Marin Chapter	Mia Monroe	415/457-8811
Stephanie Moulton- Peters	City of Mill Valley	Mia Monroe	415/388-4033

Nancy Graalman/ Huey Johnson	Defense of Place	Mia Monroe	415/928-3774
Mitchell Bridger	Environmental Action Committee of West Marin	Mia Monroe	415/663-9312
Vicki Rupp	Environmental Forum Of Marin	Mia Monroe	415/484-8336
Jim Gannon	Friends of Mt Tam	Mia Monroe	707/525-1052
Sara Tashev	Green Gulch/ San Francisco Zen Center	Mia Monroe	
Brian Spring	Homestead Valley Community Association	Mia Monroe	
	Homestead Valley Land Trust	Mia Monroe	
Barbara Saltzman	Marin Audubon Society	Mia Monroe	415/924-6057
Jim Elias	Marin County Bicycle Coalition	Mia Monroe	415/456-3469
Joel Bartlett	Marin Horse Council	Mia Monroe	415/259-5783
Ann Glasscock	Marin Stables and Trails	Mia Monroe	415/601-3047
Michael Kaufman	Muir Beach Community Association	Mia Monroe	415/388-5018
Peter Hindley	Muir Woods Park Community Association	Mia Monroe	
Ellie Cohen	Point Blue	Mia Monroe	707/781-2555
Todd Steiner	Salmon Protection and Watershed network	Mia Monroe	415/663-8590 X103
Michele Barni	Sierra Club of Marin	Mia Monroe	
Marika Bergsund	Slide Ranch	Mia Monroe	
Steffen Barchatt	Tam Valley Community Services District	Mia Monroe	
Janice Barry	Tamalpais Conservation Club	Mia Monroe	415/451-19912
STAKEHOLDERS	San Mateo County Orgs	Christine Fitzgerald	

Reporters (*recommended for POSSIBLE individual outreach)

Name	Organization	Specialty	Phone	Email
*Felicity Barringer	NY Times	Environmental reporter	415-644-3314 o	fbarr@nytimes.com
*Robert Semple	NY Times	editorial writer (parks-env. etc.)	212-556-1832 o	semple@nytimes.com
*Julie Cart	LA Times	Environmental Reporter	213-237-7113 o 626-437-6689	julie.cart@latimes.com
*Karen Klein	LA Times	Editorial writer (interest in environment issues)	213-237-5000	karen.klein@latimes.com
*Laura Bly	USA Today	travel writer (covers NPs)	703-854-3400 (switchboard)	lbly@usatoday.com
Veronica Stoddart	USA Today	travel editor, LIFE section	703-854-6405 o	vstoddart@usatoday.com
*Glen Nishimura	USA Today	op-ed page editor,	703-854-4426 o	gnishimura@usatoday.com
*Elizabeth Shogren	NPR	environment reporter	202-513-2000 (main)	eshogren@npr.org
*Ray Ring,	High Country N	senior editor	970-527-4898 o	rayring@hcn.org
*Kurt Repanshek	National Parks Traveler		435-645-8680 o 435-640-0829 c	kurt@nationalparkstraveler.com , kurt@kjrwrites.com
Brian Vastag,	Washington	environment reporter	202-334-7410 o	national@washpost.com
Jonathan Capehart	Washington Post	editorial writer politics/environment)		outlook@washpost.com
LOCAL media to contact		SF Chronicle, Marin IJ, Point Reyes Light, Half Moon Bay Review, SF Examiner, Mercury (Paul Rogers)		
		NBC News		
		ABC News		
		CBS News		
		CNN		
		Fox News		
		MSNBC and MSNBC.com		
		Slate.com		
		Salon.com		
		Outside Magazine		
		Backpacker Magazine		
		Energy & Environment Daily/ Greenwire news service		
		Huffington Post		

Appendix 3: Public Informational Meetings/Webchat

Public Informational Meetings

Below is the proposed sequencing of the formally noticed public informational meetings. One or more will be held in each county of the park.

Registration:

Upon arrival, attendees will provide their contact information and also sign up to make a comment in front of the public.

Open House period:

Begin with an open house of approximately 30 minutes. Stations organized by county will be set up, with maps and display boards, where meeting participants can learn about the Proposed Rule and ask questions of NPS staff.

Formal Presentation:

The public would be invited to a 30-45 minute presentation by NPS staff on the Proposed Rule.

Public Discussion:

Following the NPS presentation, members of the public can ask questions and make clarifying points for the benefit of other meeting participants. Speakers will be limited to 2 minutes, and no response will be provided. Note that these comments will not be formally captured or considered. Comments must be officially submitted by mail to the superintendent, or online through regulations.gov.

Webchat

A webchat will be scheduled approximately midway through the public comment period on the Proposed Rule. The details on format and structure are TBD, but the focus will be on clarifying the content of the Proposed Rule and answering public questions on it.

GOGA/PWR/EQD Employees Available for Public Meetings

1. Christine Lehnertz, General Superintendent
2. Aaron Roth, Deputy Superintendent
3. Howard Levitt, Director of Communications
4. Alex Picavet, Public Affairs Specialist
5. Mike Savidge, Strategic Planning Chief and Dog Management Project Manager
6. Michael Edwards, EQD Environmental Project Manager
7. Brian Aviles, Acting Chief of Planning
8. Bill Merkle, Wildlife biologist
9. Brian Aviles, Chief of Planning
10. Christine Fitzgerald, San Mateo Community Planner
11. Chuck Plummer, Administration
12. Cpt. Pamela Smith, USPP
13. Daphne Hatch, Chief of Natural Resources
14. Mia Monroe, Marin Community Liaison
15. Randy Lavasseur, Chief Ranger
16. Matt Wallet, Supervisory Law Enforcement Ranger
17. Chad Marin, Deputy Chief Ranger
18. Craig Dalby and Stephanie Burkhardt, PWR Public Affairs

From: BeckyE rebecca@ (b) (6)
Subject: Fw: [SFB-GEN*] Albany: Suit refiled over off-leash dogs at beach Damin
Esper.21Apr16.East Bay Times
Date: April 22, 2016 at 10:51 AM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@ (b) (6)



From: BeckyE rebecca@ (b) (6)
Subject: Fw: GGNRA Dog Plan
Date: February 23, 2016 at 6:23 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@ (b) (6)



From: Neal Desai ndesai@npca.org
Subject: FW: MarinIJ and SF Chron stories on dog rule
Date: February 22, 2016 at 8:45 PM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers [\(b\)\(6\)](mailto:howandwen@(b)(6))



Rodeo Beach the only Marin off-leash dog site in proposed rule for GGNRA

By [Mark Prado](#), *Marin Independent Journal*

POSTED: 02/22/16, 6:26 PM PST | UPDATED: 47 SECS AGO

[0 COMMENTS](#)

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Almost-final rules governing where dogs can and can't be in the national area — which includes parts of Marin, San Francisco and San Mateo counties — will be issued after 15 years of often-heated discussion and review.

“Marin County is particularly hard hit,” said Cassandra Fimrite of Marin County DOG in a statement. “The only remaining off leash access for Marin will be at the north end of remote Rodeo Beach — requiring a long drive for all visitors, and adding to southern Marin’s already terrible traffic.”

But there is also support for restrictions.

“Dogs can go out and run after wildlife,” said Barbara Salzman, president of Marin Audubon, at a recent Independent Journal editorial board meeting. “The more interruptions a species has, the more it impacts their nesting and feeding, especially shorebirds. On leash is more acceptable.”

The issue has pitted passionate dog owners against Golden Gate National Recreation Area officials and environmentalists. Dog owners say their dogs need to be off leash and have space to run, but there have been complaints lodged with recreation area officials about aggressive dogs attacking people and smaller animals scaring children and trampling sensitive wildlife habitat and species.

Beginning Wednesday there will be a 60-day comment period on the rules, which can be found beginning 6 a.m. Tuesday by searching federalregister.gov/public-inspection for Golden Gate Dog Management. Two hearings — 6 to 8 p.m. March 23 at the Bay Model in Sausalito and 6 to 8 p.m. March 30 at the Mill Valley Community Center — have been set in Marin.

Then, by the end of the year, the rules will be put into place and become enforceable in the first part of 2017. Off-leash dog walking advocates expect the issue to end up in the courts, where it has been before.

MARIN RESTRICTIONS

The new rules — if finalized as they are — would mark a change in how dogs are walked on the Golden Gate lands in Marin. Presently dogs can be off leash at Rodeo Beach, Oakwood Valley Road, Muir Beach, Homestead Valley and Alta Avenue.

Under the new rules, Rodeo Beach would be the only place where dogs could run free. Muir Beach would have to be on-leash, after an earlier version of the plan had them banned entirely. Dogs on the Oakwood Valley Road, Homestead Valley and Alta Avenue would now be on-leash. In fact, park service officials said all trails in Marin would at a minimum require leashes, and others would have an outright ban on dogs.

At the park service controlled area of Stinson Beach, Muir Woods National Monument, Tennessee Valley trail, and Audubon Canyon dogs are off limits, leashed or not, and those rules would stay in place.

FEDS ‘NOT LISTENING’

Dog supporter Martha Walters of San Rafael questioned the new rules, saying they lack merit in two areas.

“This is not just we don’t like it; where is the scientific and legal reasoning? There is none,” she said. “The park service is not listening to the public. We don’t think dogs should be everywhere, but we do think there should be scientific and legal support for the plan. There is not.”

The plan was praised by Neal Desai, director of Pacific Region Field Operations for the National Parks Conservation Association.

“The challenge is striking a balance between these various forms of recreation while also protecting the park’s fragile resources,” he said in a statement. “And this thoroughly researched and carefully thought out proposal does just that.”

Of the 8.7 miles of beaches in the park, about 2.7 miles or 31 percent would be available to dogs and 2.3 miles or 26 percent would allow dogs off leash, according to park officials. Of the 137 miles addressed by the plan, about 46 miles, or 34 percent, would be available to dog walking, but in Marin it would be all on leash.

“Walking a dog is fun, healthy and popular and it’s something we want to be able to maintain, while we reduce the conflicts that are out there,” said Christine Lehnertz, Golden Gate’s superintendent. “We think the proposed rule can provide a safer and more balanced approach to dog walking.”

The superintendent could open new trails to on-leash walking in the future if unofficial social trails are legitimized.

Under the new rule, leashes could be no longer than 6 feet and there is cap of six dogs per dog walker. The park service estimates the roll-out would cost about \$2.5 million for new signs, educational material and enforcement personnel.

POSSIBLE TEMPLATE

With its plan, the park service is trying to strike a balance to protect wildlife habitat and people, while allowing dogs and their owners places to recreate. The long-awaited final ruling could also set a wide-ranging precedent for dogs in national parks across the country.

The dog debate has its roots in a special rule that was created by Golden Gate in 1979 to allow canines off leash. After fielding complaints about aggressive dogs and other canine problems, in 2000 park officials tried to implement a policy that required leashes.

But in June 2005, a U.S. District Court judge ruled the recreation area failed to take public comment before requiring dogs be leashed. In response to the ruling, recreation area officials said dogs could be off leash in certain areas as long as they were under voice control. It then launched the rule process, which culminated with the new plan.

<http://www.sfgate.com/news/article/Proposal-issued-to-further-limit-dogs-in-GGNRA-6848065.php>

Proposal issued to further limit dogs in GGNRA

By [Steve Rubenstein](#)

Published 7:42 pm, Monday, February 22, 2016

Howls and growls from both ends of the dog leash are greeting proposed new rules that would severely restrict the decades-old practice of off-leash dog walking in the Golden Gate National Recreation Area.

The proposed rules, announced Monday, would limit off-leash walking to only five areas within the 80,000-acre recreation area — Crissy Field, Fort Funston, Ocean Beach, Fort Mason and Rodeo Beach. Within those areas, the amount of space currently allowed for off-leash walking would be further trimmed.

Some sites that currently allow off-leash walking would be restricted to on-leash walking. Some sites that allow on-leash walking would ban dogs altogether.

“This is a huge disappointment,” said [Sally Stephens](#), chairwoman of the [San Francisco Dog Owners Group](#). “Instead of bringing people to nature, the Park Service seems to be trying to find ways to keep people away.”

In San Francisco, the two primary sites for off-leash dog walking — Crissy Field and Fort Funston — would lose more than half of their current off-leash acreage. At Fort Funston, in the southwest corner of San Francisco, the current 85 acres designated for off-leash walking would be cut to 35 acres. At Crissy Field, off-leash walking behind East Beach and on most of the airstrip area would no longer be allowed — a loss of about half the current space.

Particularly hard hit would be Marin County, which would lose off-leash dog walking nearly everywhere in the GGNRA except a section of Rodeo Beach. And San Mateo County would continue to have no off-leash dog walking areas.

In Marin, dog-friendly Muir Beach would lose off-leash walking. Longtime resident [Laura Pandapas](#) lamented that she will no longer be able to take her daily off-leash walk with her poodle, Shugie.

“This is going to decimate the quality of life in Marin,” she said. “Our public spaces need to be shared by everyone. It’s not fair for someone to think a public space has to be perfect, and has to be sanitized just for them.”

The new rules, which are subject to public comment and expected to be made final by the end of the year, are the culmination of a process that began in 2002, when the [National Park Service](#) said it first began considering how to restrict the practice that had long been allowed on the lands that it inherited when it established the GGNRA in the 1970s.

“We need to consider the needs and desires of a full range of visitors, some of whom enjoy experiencing the park with dogs and some of whom don’t,” said [Howard Levitt](#), director of communications for the recreation area. “Many visitors want to have an experience that doesn’t have a dog encounter in it. We reject the notion that we began with a negative mind-set toward dogs.”

That view was shared by few in the canine community, who maintain that the GGNRA has long sought to severely restrict or banish dogs from the area, which stretches from Marin County through San Francisco to San Mateo County, largely on former military lands. Dog advocates say the GGNRA is not a pristine wilderness, like some National Park Service properties, but an urban park where pets are part of the landscape and off-leash dogs have long been welcomed.

“In places like Yellowstone or Yosemite, these restrictions might make sense,” Stephens said. “Not here.”

Another group of GGNRA users, San Francisco-based Save Our Recreation, said the new rules will “lead to the largest loss of public access to the GGNRA since its inception.”

“This federal bureaucracy is imposing its will onto the local community and completely ignoring the needs of the people who live nearby and frequently use these areas - the very reason the GGNRA was created,” said [Andrea Buffa](#) of Save Our Recreation. “The Park Service has really thumbed its nose at the San Francisco, Marin and San Mateo boards of supervisors. All are on record opposing the dog management plan, and today’s proposed dog rule is exactly the same as earlier Park Service proposals.”

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The GGNRA says it has long fielded complaints from people without dogs who say they avoid the dog-friendly areas. Dog owners reply that the new rules discriminate against both dogs and people with dogs.

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GGNRA superintendent [Chris Lehnertz](#) said the area has been trying to hash out a fair dog policy for decades. Park usage, she said, has grown from 1.5 million people a year in the 1970s to 15 million last year and that means a lot more creatures — both the two-legged and four-legged kind — per acre of park.

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Steve Rubenstein is a [San Francisco Chronicle](#) staff writer. Email: SRubenstein@sfchronicle.com

From: Howard Levitt and Wendy Scheffers [\(b\) \(6\)](mailto:howandwen@(b) (6))
Subject: Fwd: MarinIJ and SF Chron stories on dog rule
Date: February 22, 2016 at 9:07 PM America/Los_Angeles
To: chris_lehnertz@nps.gov



Begin forwarded message:

From: Neal Desai <ndesai@npca.org>
Date: February 22, 2016 8:45:15 PM PST
To: Howard Levitt and Wendy Scheffers <[\(b\) \(6\)](mailto:howandwen@(b) (6))>
Subject: FW: MarinIJ and SF Chron stories on dog rule

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Steve Rubenstein is a [San Francisco Chronicle](#) staff writer. Email: SRubenstein@sfchronicle.com

From: BeckyE rebecae@(b) (6)
Subject: Fw: Re: Thank you for supporting recreation for all and protection of imperiled wildlife at GGNRA with your vote today



Date: March 24, 2016 at 2:28 PM America/Los_Angeles

To: Virginia Reinhart virginia.reinhart@sierraclub.org, Josh Sonnenfeld josh.sonnenfeld@sierraclub.org, Michael Ferreira MichaelJFerreira@(b) (6)

From: [BeckyE](#)
To: [Virginia Reinhart](#); [Josh Sonnenfeld](#); [Michael Ferreira](#)
Subject: Fw: Re: Thank you for supporting recreation for all and protection of imperiled wildlife at GGNRA with your vote today
Date: Thursday, March 24, 2016 2:28:29 PM

-----Forwarded Message-----

From: Cindy Margulis
Sent: Mar 24, 2016 12:25 PM
To: Neal Desai
Cc: Brent Plater , "BeckyE (rebecae@**(b) (6)**)" , "amy7w2m@**(b) (6)**"
Subject: Re: Thank you for supporting recreation for all and protection of imperiled wildlife at GGNRA with your vote today

I've returned from being away.
I just wanted to let you all know that Golden Gate Audubon has issued an electronic Action Alert to its thousands of members about the Dog Rule with links to contact the relevant US Congressional legislators.

Here's a weblink to what we'd sent:

<http://goldengateaudubon.org/expired-announcement/news/support-sensible-new-dog-rules-for-the-ggnra/>

There's also a post on our Facebook page, as well.
Feel free to re-post from the Golden Gate Audubon FB, if desired, to make it easy-peasy for folks to comment to our region's federal legislators.

Cindy

On Tue, Mar 15, 2016 at 5:28 PM, Neal Desai <ndesai@npca.org> wrote:

Supervisor Mar,

Thank you for speaking up for the balance that the proposed rule creates for all park users and imperiled wildlife, and for the oppositional, unconstructive nature of the resolution.

Much appreciated, and conservation groups and stakeholders who use the park will continue to push for the approval of the plan. Please let us know what else you may need in the future regarding this matter or the GGNRA generally.

Thanks again,

Neal

p.s. interestingly and ironically, this is what Matier & Ross last month said about Katy Tang and resolutions:

Woods Day: San Francisco Supervisor **Katy Tang** was unusually candid about why she joined her fellow board members in their unanimous vote for a day of remembrance for **Mario Woods**, the man shot to death by five police officers Dec. 2 when he refused to drop a knife.

In an e-mail to constituent **Kathy Lewis**, who was upset by the board's action, **the moderate Tang said she was "not a fan of these nonbinding resolutions."** But if she had voted no, she said, the measure would have gone to committee for debate and "I would have have caused more media attention and more protests and more discord."

"I would have become the next focus of the Black Lives Matter movement," Tang said.

As for why some of her board colleagues pushed for the resolution in the first place?

"It is for the media attention," Tang wrote. "In fact, that's usually the only reason why supervisors introduce resolutions."

--

Cindy Margulis
Executive Director
Golden Gate Audubon Society
2530 San Pablo Ave., Suite G
Berkeley, CA 94702
Tel: (510) 843-9912
www.goldengateaudubon.org

From: "Levitt, Howard" howard_levitt@nps.gov
Subject: Fwd: Annnnnnd again!
Date: December 08, 2015 at 10:21 PM America/Los_Angeles
To: Wendy Scheffers howandwen@(b) (6)



----- Forwarded message -----

From: Freeman, Adrienne <adrienne_freeman@nps.gov>
Date: Tue, Dec 8, 2015 at 5:42 PM
Subject: Annnnnnd again!
To: Howard Levitt <howard_levitt@nps.gov>

--

Winter Hours: Monday- Thursday, 7:30am to 6pm

Adrienne Freeman
Acting Public Affairs Specialist
Golden Gate National Recreation Area
201 Fort Mason
San Francisco, California 94123
office 415.561.4732
cell 209.742.3391

--

Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
415-561-4730

Attachments:

[Final DRAFT Dog Communication Plan Dec 8 1740.docx](#) (193.3 kB)

From: [Howard Levitt and Wendy Scheffers](#)
To: [Howard Levitt](#)
Subject: Fwd: Slides for Supe Hearing
Date: Monday, April 11, 2011 12:50:18 AM
Attachments: [Slides for SF supe hearing.doc](#)
[Untitled attachment 08416.htm](#)

Begin forwarded message:

From: Howard Levitt and Wendy Scheffers <[\(b\) \(6\)](mailto:howandwen@(b) (6))>
Date: April 10, 2011 9:20:42 PM PDT
To: Frank Dean <frank_dean@nps.gov>, shirwin_smith@nps.gov, alexandra_picavet@nps.gov
Subject: Slides for Supe Hearing

Frank, Shirwin and Alex:

Attached are some slides I thought would best make our case in a step-by-step, yet concise, way. Please let me know your thoughts - the text will need to be tightened on several of the slides, and I want to review them against the Steven Krefting, et al, and Jan Blum letters for completeness. I will be in around 8:00 AM tomorrow to chat with you (Alex) about creating these slides.

On Sat, I heard a KGO talk show program about the GOGA dog issue while I was waiting in line at the post office. Balanced comments from callers; total bias from the host. He told his listeners to show up on Mon.

Howard

From: [Levitt Howard](#)
To: [Wendy Scheffers](#)
Subject: Fwd: Supervisor Scott Wiener's -- about 31 Jan. forum i Stern Grove
Date: Thursday, February 20, 2014 4:40:59 PM

----- Forwarded message -----

From: Bob Plantho <[\(b\) \(6\)](mailto:political_bob@(b)(6))>
Date: Wed, Feb 19, 2014 at 4:23 PM
Subject: Fwd: Supervisor Scott Wiener's -- about 31 Jan. forum i Stern Grove
To: leashlaw@yahogroups.com
Cc: Neal Desai <ndesai@npca.org>

This is a verbatim excerpt from a much longer newsletter.



February 2014 Newsletter

Office Phone: 415-554-6968
Email: scott.wiener@sfgov.org
Website: www.scottwiener.com

In this Newsletter

[Policy Work](#)

[Streetlight Funding](#)
[Code Enforcement](#)
[Nightlife Transportation](#)
[Development Fees](#)
[GGNRA Update](#)
[In-Law Legislation](#)
[Soda Tax](#)
[Pedestrian Safety Update](#)

[Community Updates](#)

[Castro Streetscape](#)
[Dolores Park](#)
[Glen Canyon](#)
[Diamond/Bosworth](#)
[San Jose Avenue](#)

[Community Calendar](#)

[Office Hours](#)

Saturday, March 1st
10:30am-12:00pm
Maxfield's House of Caffeine
398 Dolores Street

[Proposed Restrictions on Dog Access in Federal Recreation Areas](#)

Recently, I [joined a panel organized by Congresswoman Jackie Speier](#) to discuss the proposal by the National Park Service to severely restrict dog access at federal park properties, including Fort Funston, Crissy Field, and Ocean Beach. Last year, I authored a resolution at the Board of Supervisors, which passed unanimously, putting San Francisco on record opposing the plan. I'm happy that Congresswoman Speier has taken a strong position against the plan as well. You can [read an editorial](#) on this issue by advocate Sally Stephens published in the Chronicle a few weeks ago and [listen to a radio spot](#) I recorded on KFOG.

Friday, March 14th
12:30pm-2:30pm
City Hall, Room 274



Scott at the GGNRA Dog Management Plan Public Forum with San Mateo County Parks Director Marlene Fairley, General Manager of San Francisco Rec and Park Phil Ginsburg, GGNRA Superintendent Frank Dean and Congresswoman Jackie Speier

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by

--
Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
415-561-4730

From: [Levitt, Howard](#)
To: [Wendy Scheffers](#)
Subject: Fwd: Updated Marin IJ Op Ed
Date: Thursday, May 08, 2014 6:48:29 PM
Attachments: [Op Ed re GGNRA GMP.docx](#)
[Op Ed re GGNRA GMP.docx](#)

----- Forwarded message -----

From: **Levitt, Howard** <howard_levitt@nps.gov>
Date: Thu, May 8, 2014 at 6:42 PM
Subject: Updated Marin IJ Op Ed
To: Frank Dean <frank_dean@nps.gov>, Greg Moore <gmoore@parksconservancy.org>, dshaw <dshaw@parksconservancy.org>

Frank, Greg, and David: Here is a slightly revised version of the Marin IJ Op Ed. This fits their length requirement of around 550-600 words. Need your suggestions ASAP. I want to send this tonight, so they can plan for publication on Sunday. Howard

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Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
415-561-4730

--

Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
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GGNRA Dog Management History

1. Of the 407 areas of the National Park System, not one permits off-leash dogs, and it is a significant stretch for the National Park Service to even consider off-leash dog use.
2. When Golden Gate National Recreation Area took over the ownership of most of the beach areas of San Francisco and southern Marin, the park's administration acknowledged the long tradition of off-leash dog recreation in those areas of the park. This led to a 1979 recommendation by the Federal Advisory Commission for the GGNRA that dogs be allowed off-leash in different areas of the park, though the recommendation was not informed by scientific research or consideration of other park users. GGNRA made that recommendation park policy.
3. By the mid-1990s, the damage caused by off-leash dogs to dunes, habitat, and wildlife had become evident. When the Federal Advisory Commission tried to rescind the 1979 policy, dog owners went to court. The judge ruled there would have to be a formal public removal of the policy, instead of reverting to the national regulations. GGNRA petitioned the NPS regional and national directorate to allow development of a Special Rule for dog management, for this park only. This regulation would meet the preservation and recreation mandates of the park's legislation. This process, with extensive public input and several revisions, has been continued for 15 years. The damage to the park's resources has increased, and dog owners feel ever more entitled to run their dogs off-leash.
4. GGNRA is required to consider the expectations of a broad array of national park visitors from all over the country and the world, not solely the interests of single-issue stakeholders. Of the 22 park sites originally evaluated for off-leash use, the 5 that are most contested are those which are popular with all users and include habitat for sensitive species: Fort Funston, Ocean Beach, Crissy Field, Rodeo Beach, and Muir Beach. Under the proposed Special Rule, all but Muir Beach will have off-leash areas. The 8 off-leash areas will be at Crissy Field, Fort Funston, and Fort Mason's Great Meadow— each will have 2 areas— and Ocean Beach and Rodeo Beach will each have 1 area— for a total of 8.
5. NPS carefully assessed every area governed by the 1979 Pet Policy and additional lands sold or donated to the park since then, such as San Mateo County lands. GGNRA identified 8 areas where they feel off-leash dog experience can be provided without threatening wildlife and habitat, and permitted other opportunities for those who want a dog-free experience. In addition to the 8 proposed off-leash areas, GGNRA identified 21 areas for on-leash dog walking.
6. Commercial dog walkers are limited to certain areas and are subject to a 3 dog maximum except on Fort Funston, Fort Mason, Baker Beach, and Crissy Field in San Francisco and Fort Baker, Rodeo Beach, and Alta Trail in Marin where they are subject to a 6 dog limit. The 6 dog limit is the same as that for the Presidio and the city parks in San Francisco. The dogs may be off-leash where otherwise permitted. NPS authority to permit this use is contested by several environmental groups.

From: howandwen(b) (6)
Subject: IMPORTANT re previous note
Date: February 25, 2016 at 7:28 AM America/Los_Angeles
To: Lois Kazakoff lkazakoff@sfchronicle.com



Lois, though this and my previous note came from my home account, please do NOT consider my previous note to be a letter to the editor. I just wanted to point out the error in the editorial. Thanks. Howard Levitt Director of Communications Golden Gate National Recreation Area Sent from my iPhone > On Feb 25, 2016, at 7:16 AM, howandwen@ (b) (6) wrote: > > Hi Lois, > We appreciated the balanced approach in the editorial this morning. There was one factual error, however. There are seven areas proposed for off-leash dog walking, but Rancho Corral de Tierra in San Mateo County is not one of them. We had considered a few areas there, but did not include any in the preferred alternative of the SEIS because of the concerns we had discussed on the call. I'm sorry if I explained that in a way that was unclear. The proposed off leash area you did not mention is the north end of Ocean Beach. > Again, thank you for trying to help foster reason on a sometimes overheated issue. > Howard > > Sent from my iPhone

From: howandwen@(b) (6)
Subject: Fwd: IMPORTANT re previous note
Date: February 25, 2016 at 7:30 AM America/Los_Angeles
To: Chris Lehnertz Chris_Lehnertz@nps.gov, Michael Savidge Michael_J_Savidge@nps.gov, Adrienne Freeman adrienne_freeman@nps.gov, Alexandra Picavet alexandra_picavet@nps.gov



Just sent this to Lois. Don't want her to run my first note as a letter to the editor. H

Sent from my iPhone

Begin forwarded message:

From: [howandwen@\(b\) \(6\)](mailto:howandwen@(b) (6))
Date: February 25, 2016 at 7:28:23 AM PST
To: Lois Kazakoff <lkazakoff@sfchronicle.com>
Subject: IMPORTANT re previous note

Lois, though this and my previous note came from my home account, please do NOT consider my previous note to be a letter to the editor. I just wanted to point out the error in the editorial.

Thanks.

Howard Levitt

Director of Communications

Golden Gate National Recreation Area

Sent from my iPhone

On Feb 25, 2016, at 7:16 AM, [howandwen@\(b\) \(6\)](mailto:howandwen@(b) (6)) wrote:

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The proposed off leash area you did not mention is the north end of Ocean Beach.

Again, thank you for trying to help foster reason on a sometimes overheated issue.

Howard

Sent from my iPhone

From: "Kazakoff, Lois" LKazakoff@sfchronicle.com
Subject: RE: IMPORTANT re previous note
Date: February 25, 2016 at 9:07 AM America/Los_Angeles
To: "howandwen@gmail.com" howandwen@(b) (6)



I went over my notes last night and I had listed the seven. There was no mention of Ocean Beach, although we talked about Ocean Beach separately. I did not connect Ocean Beach. I'll fix now. Follow me on Twitter: @lkazakoff Follow me on Instagram: Lois_Kaz Read Chronicle editorials, Open Forum and Insight commentary at SFChronicle.com -----Original Message----- From: howandwen@(b) (6) [mailto:howandwen@(b) (6)] Sent: Thursday, February 25, 2016 7:28 AM To: Kazakoff, Lois Subject: IMPORTANT re previous note Lois, though this and my previous note came from my home account, please do NOT consider my previous note to be a letter to the editor. I just wanted to point out the error in the editorial. Thanks. Howard Levitt Director of Communications Golden Gate National Recreation Area Sent from my iPhone > On Feb 25, 2016, at 7:16 AM, howandwen@(b) (6) wrote: > > Hi Lois, > We appreciated the balanced approach in the editorial this morning. There was one factual error, however. There are seven areas proposed for off-leash dog walking, but Rancho Corral de Tierra in San Mateo County is not one of them. We had considered a few areas there, but did not include any in the preferred alternative of the SEIS because of the concerns we had discussed on the call. I'm sorry if I explained that in a way that was unclear. The proposed off leash area you did not mention is the north end of Ocean Beach. > Again, thank you for trying to help foster reason on a sometimes overheated issue. > Howard > > Sent from my iPhone

Attachments:

[Lois Kazakoff.vcf](#) (24.89 kB)

From:

H

howandwen@(b) (6)

Subject:

Re: IMPORTANT re previous note

Date:

February 25, 2016 at 11:55 AM America/Los_Angeles

To:

"Kazakoff, Lois" LKazakoff@sfchronicle.com

Thank you, Lois. Sorry if I was unclear. Howard Sent from my iPhone > On Feb 25, 2016, at 9:07 AM, Kazakoff, Lois wrote: > > I went over my notes last night and I had listed the seven. There was no mention of Ocean Beach, although we talked about Ocean Beach separately. I did not connect Ocean Beach. I'll fix now. > > > Follow me on Twitter: @lkazakoff > > Follow me on Instagram: Lois_Kaz > > Read Chronicle editorials, Open Forum and Insight commentary at SFChronicle.com > > -----Original Message----- > From: howandwen@(b) (6) [mailto:howandwen@(b) (6)] > Sent: Thursday, February 25, 2016 7:28 AM > To: Kazakoff, Lois > Subject: IMPORTANT re previous note > > Lois, though this and my previous note came from my home account, please do NOT consider my previous note to be a letter to the editor. I just wanted to point out the error in the editorial. > Thanks. > Howard Levitt > Director of Communications > Golden Gate National Recreation Area > > Sent from my iPhone > > On Feb 25, 2016, at 7:16 AM, howandwen@(b) (6) wrote: >> >> Hi Lois, >> We appreciated the balanced approach in the editorial this morning. There was one factual error, however. There are seven areas proposed for off-leash dog walking, but Rancho Corral de Tierra in San Mateo County is not one of them. We had considered a few areas there, but did not include any in the preferred alternative of the SEIS because of the concerns we had discussed on the call. I'm sorry if I explained that in a way that was unclear. The proposed off leash area you did not mention is the north end of Ocean Beach. >> Again, thank you for trying to help foster reason on a sometimes overheated issue. >> Howard >> >> Sent from my iPhone >

1. Of the 407 areas of the National Park System, not one permits off-leash dogs, and it is a significant stretch for NPS to even consider off-leash dog use.

2. When Golden Gate National Recreation Area took over the ownership of most of the beach areas of San Francisco and southern Marin, the park's administration acknowledged the long tradition of off-leash dog recreation in those areas of the park. This led to a 1979 recommendation by the Federal Advisory Commission for the GGNRA that dogs be allowed off-leash in many different areas of the park, though the recommendation was not informed by scientific research or consideration of other park users. GGNRA made that recommendation park policy.

3. By the mid-1990s, the damage caused by off-leash dogs to dunes, habitat, and wildlife had become evident. When the Federal Advisory Commission tried to rescind the 1979 policy, dog owners went to court. The judge ruled there would have to be a formal public removal of the policy, instead of reverting to the national regulations. GGNRA petitioned the NPS regional and national directorate to allow development of a Special Rule for dog management, for this park only. This regulation would meet the preservation and recreation mandates of the park's legislation. This process, with extensive public input and several revisions, has been going on for 15 years. The damage to the park's resources has continued to increase, and dog owners feel ever more entitled to run their dogs off-leash.

4. GGNRA is required to consider the expectations of a broad array of national park users from all over the country and the world, not solely the interests of single-issue stakeholders. Of the 22 park sites originally evaluated for off-leash use, the 5 that are most contested are those which are popular with all users and include habitat for sensitive species: Fort Funston, Ocean Beach, Crissy Field, Rodeo Beach, and Muir Beach. Under the proposed Special Rule, all but Muir Beach will have off-leash areas. The 7 off-leash areas will be at Crissy Field, Fort Funston, and Fort Mason's Great Meadow— each will have 2 areas— and Ocean Beach and Rodeo Beach will each have 1 area— for a total of EIGHT

5. NPS carefully assessed every area governed by the 1979 Pet Policy. They later reviewed key San Mateo County sites that were not owned or managed by the park in 1979, to determine if there were any areas where dogs could be permitted off leash without threatening wildlife and habitat, and which also permitted opportunities for those who want a dog-free experience. GGNRA identified 7-8 areas where they feel off-leash dog ~~use can occur~~ can be provided. In many instances, the original land manager prior to GGNRA did not allow off-leash dog walking, though the use was continuing illegally. When NPS or other federal land management agencies review park uses, they do not grandfather in uses that are conducted against regulation

6. In addition to the 7 (8?) proposed off leash areas, there are 21 areas (including some that also permit off leash) that are proposed for on-leash dog walking.

7. Commercial dog walkers are limited to certain areas and are subject to a 3 dog maximum except on Fort Funston, Fort Mason, Baker Beach, and Crissy Field in San Francisco and Fort Baker, Rodeo Beach, and Alta Trail in Marin where they are subject to a 6 dog limit. The 6 dog limit is the same as that for the Presidio and the city parks in San Francisco. The dogs may be off-leash where otherwise permitted. NPS authority to permit this use is contested by several environmental groups.

From: Amy Meyer a7w2m (b) (6)
Subject: Ocean Beach
Date: July 14, 2015 at 8:53 AM America/Los_Angeles
To: Howard Levitt and Wendy Scheffers howandwen@ (b) (6)



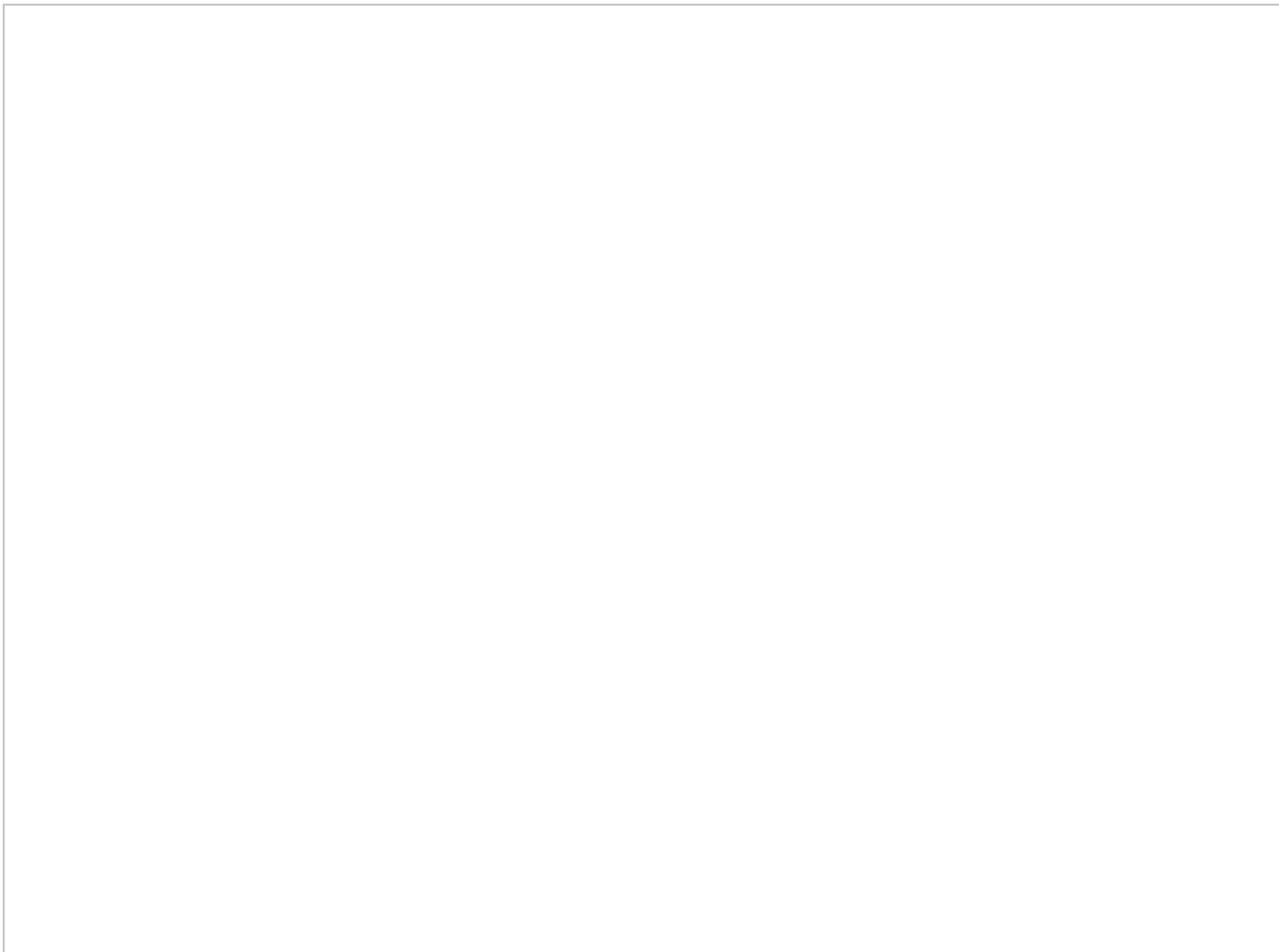
Doesn't Ocean Beach have an off-leash area? Are there 8?

5. *In addition to the 7 proposed off leash areas, there are 21 areas (including some that also permit off leash) that propose on-leash dog walking.*

Please give us the names of all 7 off-leash areas.

RODEO BEACH; FORT MASON GREAT MEADOW (TWO AREAS); CRISSY FIELD (TWO AREAS); FORT FUNSTON (TWO AREAS)

From: Howard Levitt and Wendy Scheffers howandwen@(b) (6)
Subject: on KQED Forum re: dog management - January 2011
Date: September 28, 2016 at 7:31 PM America/Los_Angeles
To: Erin Heimbinder eheimbinder@(b) (6)



MG_0160.JPG

Attachments:

[MG_0160.jpg](#) (1.18 MB)

Dog Management at Golden Gate NRA

The Political Landscape

As dog ownership has increased sharply in communities surrounding the park since the late 1970's, so has political advocacy for off leash access to parklands.

Many dog owners are well-educated and affluent, and are politically connected and savvy. Many have grown to view off leash dog walking as a right, and have lately hired attorneys and engaged in effective public affairs campaigns to convince elected officials that any attempt to limit off leash dog walking is an assault on their rights.

This viewpoint was expressed through the two lawsuits brought against the park for taking actions to in any way limit off leash dog access.

The effectiveness of the off leash dog advocates has made them a political force to be reckoned with, and many politicians have taken up the cause of off leash use for fear of political retribution, as well as their own personal viewpoints on the topic.

On the other hand, most politicians recognize that NPS has to address the desires and concerns of the spectrum of public viewpoints, as well as adhere to our mandate to protect park resources. While most of the elected officials have been relatively restrained in their public comment, most have expressed a desire to see the most off-leash access possible in our future dog management rule. A few have taken up the cause off leash dog walking and are spokespersons for the off leash advocacy groups.

Some environmental groups have been steadfastly opposed widespread off-leash use of the park for reasons of resource protection, some major environmental orgs have stayed out of the discussion because of conflicting views among their membership.

Some disabled rights advocates are for tight restrictions on off-leash use, as are some children's advocacy groups. They seem largely willing to trust that the NPS will make the right decision.

General Climate

- Since release of SEIS in Sept 2013, park has received more letters and email and social media postings supporting restrictions on off-leash dogs.
- When specifics of the dog plan are explained, the balance achieved by the plan appears to be understood by an increasing number of people.
- Dog advocates may have overplayed their hands. Many are linking them to others (i.e. tech workers) they feel are acting "entitled.
- Comments following news articles on the dog issue are at least even, if not leaning toward support of the NPS position.
- We can expect a very strong reaction as the draft rule is released.
- Strong information campaign about rule will be necessary to weather the storm. Emphasis will need to be on the **balance of interests** reflected by the plan/rule , **amount of dog opportunities**, and **need to manage for the future** and on behalf of the entire country.

Federal Elected Officials

Rep Nancy Pelosi

- Expressed her desire that the park be responsive to community comments, especially the off-leash advocates, and recognize the needs of the surrounding urban area.
- Appears not to be generally supportive of NPS, related to recent decisions on the Presidio, as well as issues around the NPS Alcatraz ferry operation.
- Not her highest priority issue, but is probably waiting to test the winds when the draft rule is released.

Rep Jackie Speier

- On record opposing the NPS preferred alternative, particularly for RCDT.
- Had done radio spots for “Save our Recreation” and SF Dog/Montara Dog
- Has stated that she expects a ROLA in San Mateo County; has implied legislative action if the plan fails to deliver to her specifications.
- Because she has been so visible on this issue, she is unlikely to shift her position.

Rep Jared Huffman

- Measured responses to date.
- Expressed hope to see more dog access, especially loop trails in Marin, and is hoping for some off-leash at Muir Beach.

Sen Dianne Feinstein

- Has asked NPS to consider more dog access.
- Contacts us regularly to forward constituents concerns.
- Difficult to predict position when rule is released. DBOC may influence her position.

Sen Barbara Boxer

- Sent obligatory letter asking us to consider comments.
- Not active on this issue.

Local Elected Officials

San Francisco Board of Supervisors

- Has passed two resolutions opposing NPS preferred alternatives on DEIS and SEIS.
- One key issue is displacement of dogs from NPS land to city land.
- Off-leash dog advocates will shape their position on draft rule.

San Francisco Mayor Ed Lee

- Dog advocates are a major force in SF.
- Suggested NPS be as permissive as possible to keep the issue under political control.
- City has its own major dog use issues in city parks; wants NPS to absorb as many dogs as possible.
- Will probably take position consistent with Rep Pelosi.

Supervisor Scott Wiener

- District does not adjoin park, but he has been the leading off-leash advocate on Board of Supes.
- Generally reasonable, and understands our position, but has staked out a purely political calculus on this issue.
- Will probably go with the wishes of SF Dog on reaction to draft rule.

Supervisor Mark Farrell

- District includes Crissy, Presidio, and Fort Mason.
- Has expressed his hope we give as much as we can.
- Not a major issue for him personally, but he is highly political, and many Marina residents are Crissy dog users.

Supervisor Eric Mar

- District includes Lands End, Sutro Heights Park, and Ocean Beach to Lincoln Blvd.
- Relatively quiet on this issue.
- Will go with consensus on Board of Supes in response to draft rule.

Supervisor Katy Tang

- District includes OB from Lincoln to Sloat.
- Supports dog access to OB south of Stairwell 21, despite plover.
- Many constituents are daily OB users, mostly off-leash.

Supervisor Norman Yee

- District includes Fort Funston
- Quiet on this issue.
- Personally opposes off-leash use, but will not publicly say so.
- Will support majority of Board of Supes on this issue.

Marin County Board of Supervisors

- Joined with SF and San Mateo Supes in a resolution supporting position of Save our Recreation.

Supervisors Steve Kinsey and Kate Sears

- Understands our issues, but want more access.

San Mateo County Board of Supervisors

- Signed on with other boards on Save our Recreation resolution.

Supervisor Don Horsley

- On record asking for more dog access at RCDT.
- Letting Rep Speier take the lead on this issue.

Advocates

Dog Advocates

- Includes SF Dog, Crissy Field Dog, Fort Funston Dog, Montara Dog, and SF, Marin, and SM Co SPCA, Save our Recreation, several Muir Beach advocates
- Very well organized, well financed, and prepared to do battle.
- Have been consistently positional throughout the 14 year process.
- Likely to sue when rule is released, possibly at the draft stage.

Environmental Advocates

- Includes NPCA, SF Audubon, Calif Native Plant Society, Wild Equity, some Sierra Club members, People for the Parks (Amy Meyer group)
- NPCA and SF Audubon have been supportive of NPS process and outcomes.

- Most environmental advocates would prefer we tighten restrictions, but most are likely to support NPS position.
- Wild Equity most likely to sue, esp over commercial dog walking.

From: BeckyE rebecae@(b) (6)
Subject: polled on dog plan; taking back GGNRA lands
Date: February 23, 2016 at 5:30 PM America/Los_Angeles
To: Alan Carlton carltonal@(b) (6)(b) (6), Norman LaForce n.laforce@(b) (6)(b) (6), Josh Sonnenfeld josh.sonnenfeld@sierraclub.org, Amy Meyer amy7w2m@(b) (6)(b) (6) Neal Desai ndesai@npca.org, Bill Shephard wsheplaw@(b) (6)(b) (6) Bruce Hamilton Bruce.Hamilton@sierraclub.org
Cc: Becky Evans rebecae@(b) (6)



Proposed Rule Prebriefing Schedule

Day	Time	Who	Contact Via
2/22/2016	11:30 AM	Rep Pelosi WASO and Dist - Robt, Dan	phone + email
	Prefer PM	Rep Speier WASO	phone + email
	AM	Rep Speier - Dist ; Katrina and Brian	phone + email
	Prefer PM	Rep Huffman- WASO	phone
	AM	Rep Huffman- Dist: Jenny	phone
	Prefer PM	Sen Feinstein - WASO	phone/email
	AM	Sen Feinstein; Sean	phone
	Prefer PM	Sen Boxer - WASO	phone/email
	AM	Sen Boxer; Joshua	phone
	PM	Save Our Recreation - Andrea	phone
	PM	SF Dog - Sally	phone
	PM	Crissy Field Dog Grp - Martha	phone
	PM	Wild Equity	
	PM	NPCA - Neal	phone
	PM	Sierra Club - Becky	phone
	PM	People for Park - Amy	phone/email
	PM	GG Audubon - Cindy	phone
	PM	Pres Trust - Michael, Dana	phone
	PM	Parks Conservancy- Greg, David	phone
	AM	SF Supervisor Farrell	phone/email
	AM	SF Supervisor Mar	phone/email
	AM	SF Supervisor Tang	phone/email
	PM	SF Supervisor Yee	phone/email
	PM	SF Supervisor Peskin	phone/email
	PM	SF Supervisor Breed	phone/email
	9:00 AM	Marin Supervisor Sears	phone/email
	AM	Marin Supervisor Kinsey	phone/email
	11:45 AM	San Mateo Supervisor Horsley	phone/email
	AM	SF Mayor's office - Steve Kawa	phone + text
	AM	SF Rec and Parks - Phil Ginsburg	phone/email
	PM	San Mateo Cty Parks- Marlene Finley	phone/email
	PM	Calif State Parks - Victor and Danita	phone/email
	PM	Key reporters - Prado, Johnson	conf call

Caller	Notes
Chris, Howard, PWRO and WASO teams	Inc embargoed press release
PWRO and WASO teams	Inc embargoed press release
Chris, Howard	Inc embargoed press release
WASO/PWRO team	Inc embargoed press release
Chris, Howard	Inc embargoed press release
WASO/PWRO team	Inc embargoed press release
Howard	Inc embargoed press release
WASO/PWRO team	Inc embargoed press release
Chris or Howard	Inc embargoed press release
Chris or Howard	no press release
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Chris or Howard	no press release
Chris or Howard	no press release
Chris or Howard	Inc embargoed press release
Howard	no press release
Howard	Inc embargoed press release
Howard	Inc embargoed press release
Howard	Inc embargoed press release
Howard	Inc embargoed press release
Howard	Inc embargoed press release
Chris - she will call @9:00 AM	Inc embargoed press release
Chris -- call him	Inc embargoed press release
Chris or Howard call him @ 11:45	Inc embargoed press release
Chris and Howard	Inc embargoed press release
Chris or Howard	Inc embargoed press release
Chris or Howard	Inc embargoed press release
Chris or Howard	Inc embargoed press release
Howard and Alex	Inc embargoed press release

From: Frank Dean frank_dean@nps.gov
Subject: Re: Dogs
Date: December 17, 2014 at 7:52 PM America/Los_Angeles
To: "Takashiro, Janet" janet_takashiro@nps.gov, Howard Levitt Howard_Levitt@nps.gov,
Howard Levitt and Wendy Scheffers howandwen@**(b) (6)**



Okay, hope it went tonight as the meeting in DC is tomorrow.

Thanks

Frank Dean
General Superintendent
Golden Gate National Recreation Area
201 Fort Mason
San Francisco, CA 94123
(415) 561-4720

On Dec 17, 2014, at 5:03 PM, "Takashiro, Janet" <janet_takashiro@nps.gov> wrote:

Frank,

Howard said it would be easier if he sent the message directly from his box, to Peggy.
Hope that's ok.

Janet

On Wed, Dec 17, 2014 at 4:45 PM, Frank Dean <frank_dean@nps.gov> wrote:
Howard, please prepare a clean email and have Janet send to Peggy now.

Thanks,

Frank Dean
General Superintendent
Golden Gate National Recreation Area
201 Fort Mason
San Francisco, CA 94123
(415) 561-4720

On Dec 17, 2014, at 2:59 PM, "Levitt, Howard" <howard_levitt@nps.gov> wrote:

Done - see attached file.

On Wed, Dec 17, 2014 at 2:52 PM, Dean, Frank <frank_dean@nps.gov>
wrote:

Good- just add one more bullet on City relationship- supervisors
advocacy and no queries from the mayor to the park.

Thanks Howard

On Wed, Dec 17, 2014 at 2:45 PM, Levitt, Howard
<howard_levitt@nps.gov> wrote:

Frank: Here's a draft status update for Peggy...

Dog management planning process is in it's 12th year. NPS has

completed analysis of comments from the September 2013 SEIS and is developing a draft Rule, which is anticipated to go to OMB in Feb/March 2015. After OMB review, Draft Rule will be released for public review (60-90 days). Depending on release date of Draft Rule, FEIS could be released in Fall 2015, and a Final Rule published in Winter 2016.

Re Commercial Dog Walking, the park has instituted an effective permit system, which has achieved good compliance.

Off-leash advocates have been relentlessly pressing elected officials and government decisionmakers to open more areas for off leash dog use. On the other hand, environmental groups and some advocates for seniors and children, while less vocal than the off leash advocates, have made it clear they are watching closely to make sure their desires (fewer off leash dog areas, fenced areas, etc) are respected.

On Mon, Dec 15, 2014 at 1:20 PM, Frank Dean
<frank_dean@nps.gov> wrote:

Okay Peggy.

Howard, let's also call Jason Elliott in mayor's office to get some context about the meeting.

Frank

Frank Dean
General Superintendent
Golden Gate National Recreation Area
201 Fort Mason
San Francisco, CA 94123
(415) 561-4720

> On Dec 15, 2014, at 1:07 PM, Peggy O'Dell

> <peggy_o'dell@nps.gov> wrote:

>

> Need three sentences on where you are with dogs. Sally meeting with SF Mayor. Need by Thursday please. Thank you.

>

> Sent from my iPhone

--

Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
415-561-4730

--

Frank Dean
General Superintendent
Golden Gate
National Recreation Area
San Francisco, CA 94123
(415) 561-4720

--

Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
415-561-4730

<Peggy notes for Mayor Lee visit.docx>

From: Amy Meyer amy7w2m@**(b) (6)**
Subject: Re: Examiner dog op-ed
Date: April 11, 2016 at 12:10 PM America/Los_Angeles
To: Nick pagoulatos nickolas.pagoulatos@sfgov.org
Cc: Eric Mar emailericmar@**(b) (6)****(b) (6)**, BeckyE rebecca@**(b) (6)****(b) (6)** Neal Desai ndesai@npca.org



Thank you!

On Mon, Apr 11, 2016 at 11:58 AM, Pagoulatos, Nickolas (BOS)
<nickolas.pagoulatos@sfgov.org> wrote:

Hi Amy,

I got word on Friday that it will be running next Sunday.

From: Amy Meyer [mailto:amy7w2m@**(b) (6)**]
Sent: Monday, April 11, 2016 11:52 AM
To: Eric Mar <emailericmar@**(b) (6)**>
Cc: Pagoulatos, Nickolas (BOS) <nickolas.pagoulatos@sfgov.org>
Subject: Examiner dog op-ed

Dear Eric,

Did anything ever happen with the Examiner?

Amy

--

www.amywmeyer.com

--
www.amywmeyer.com

From: Frank Dean frank_dean@nps.gov
Subject: Re: GOGA Dog Planning Status
Date: December 17, 2014 at 7:53 PM America/Los_Angeles
To: "Levitt, Howard" howard_levitt@nps.gov, Howard Levitt and Wendy Scheffers
howandwen@(b) (6)



Thanks Howard!

Frank Dean
General Superintendent
Golden Gate National Recreation Area
201 Fort Mason
San Francisco, CA 94123
(415) 561-4720

On Dec 17, 2014, at 5:06 PM, "Levitt, Howard" <howard_levitt@nps.gov> wrote:

Hi Peggy: Frank asked me to send this to you in prep for the Sec's mtg with SF Mayor Ed Lee. Happy holidays to you and your family. Howard

GOGA dog management planning process is in its 12th year. NPS has analyzed comments from the September 2013 SEIS and is developing a Draft Rule, which is anticipated to go to OMB in Feb/March 2015. After OMB review, Draft Rule will be released for public review (60-90 days). Depending on release date of Draft Rule, FEIS could be released in Fall 2015, and a Final Rule published in Winter 2016.

Re Commercial Dog Walking, the park has instituted an effective permit system, which has achieved good compliance.

Off-leash advocates have been relentlessly pressing elected officials and government decision makers to open more areas for off leash dog use. On the other side, environmental groups and some advocates for seniors and children - while less vocal than the off leash advocates - have made it clear they are watching closely to make sure their desires (fewer off leash dog areas, fenced areas, etc) are respected.

City elected officials have been enlisted by off leash advocates to intervene with NPS and DOI decision makers. One Supervisor has been particularly active in advocating for the off-leash constituency. Mayor Ed Lee's office has not reached out to the park on this issue in several years.

--

Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
415-561-4730

From: Amy Meyer amy7w2m@(b) (6)
Subject: Re: Info: Dog walkers sue GGNRA
Date: April 07, 2016 at 3:43 PM America/Los_Angeles
To: Mark Westlund mark.westlund@sierraclub.org
Cc: Virginia Reinhart virginia.reinhart@sierraclub.org, Neal Desai ndesai@npca.org, Josh Sonnenfeld josh.sonnenfeld@sierraclub.org, Alan Carlton carltonal@(b) (6)(b) (6), Michelle Myers michelle.myers@sierraclub.org, BeckyE rebeccaE@(b) (6)(b) (6) "Bernal, Dan" Dan.Bernal@mail.house.gov



Please click on the red print "even Nancy Pelosi weighing in against it" and you will find that it is about Nancy getting the comment time on the proposed Special Rule extended for 30 days.

It concerns me that many people won't bother to click.

Amy

On Thu, Apr 7, 2016 at 2:56 PM, Mark Westlund <mark.westlund@sierraclub.org> wrote:

http://sfist.com/2016/04/07/dog_owners_get_serious_file_lawsuit.php

Dog Owners Get Serious, File Lawsuit Against National Park Service Over New Restrictions

BY **JAY BARMANN** IN **NEWS** ON APR 7, 2016 12:20 PM



Fort Funston. Photo: [Darwin Bell](#)

In the [ongoing drama](#) over new proposed dog rules in the Golden Gate National Recreation Area, several

local dog-owner groups filed a federal lawsuit Tuesday seeking data from the National Park Service on the impact of dogs on the area. As [KRON 4](#) and [CBS 5 are reporting](#), angry dog owners who don't want to see the number of off-leash areas decrease along the SF and Marin coasts are looking to compel the government to show them some hard numbers before the period for public comment on the proposed changes ends.

The group filing the suit goes by the name Save Our Recreation, and as an attorney representing them [tells the Chronicle](#), "It is apparent that NPS has purposefully blocked access to this information because it does not want the public to use the documents in connection with the public comment period for the proposed rule that, if implemented, would radically reduce a long-standing recreational use of the GGNRA."

The group, which serves as an umbrella organization for multiple local dog-owner groups, filed a Freedom of Information Act request for the same data back in November, but heard no response. Thus, the lawsuit.

The new rules, as detailed in February, would drastically reduce the number of off-leash areas for dogs — cutting the acreage where off-leash dog walking is allowed by more than half in popular spots like Fort Funston and Crissy Field — and banning dogs altogether in some spots.

Many, many people have spoken out against the plan, with [even Nancy Pelosi weighing in against it](#), because as we all know, anecdotally, there are more dogs than children in San Francisco. The new rules would effect a large swath of the coast though, not just in SF, as the GGNRA extends to Marin and down into San Mateo County as well.

The Park Service has previously said that the changes are trying to strike a balance of allowing dog owners and non-dog owners alike space to enjoy the beaches, and protecting habitats and the environment as well.

--
www.amywmeyer.com

From: [Amy Meyer](#)
To: [shirwin1@\(b\) \(6\)](#)
Cc: [Howard Levitt and Wendy Scheffers](#)
Subject: Re: Ray Holland paragraph
Date: Monday, May 02, 2011 3:56:50 PM

Thanks, Shirwin.

Howard, have you anything to add to Shirwin's statement? I don't like to see NPS accused of something untrue and Ray's statement should be answered.

Amy

On May 2, 2011, at 1:30 PM, [shirwin1@\(b\) \(6\)](#) wrote:

Amy - Howard should weigh in, but pgs. 63-67 of the DEIS describe in some detail the preliminary steps (and the timeline of those steps in advance of any management change) required of the NPS in instances of non-compliance, plus the public notification that would occur in areas where non-compliance is approaching 75%. A public comment period would not be part of compliance-based management, but a notification to the public would be, both when issues first arise and in the instance where a management change may be in the offing.

Shirwin

----- Original Message -----

From: "Amy Meyer" <[a7w2m@\(b\) \(6\)](#)>
To: "Howard Levitt" <[howard_levitt@nps.gov](#)>
Cc: "Shirwin Smith" <[shirwin1@\(b\) \(6\)](#)>
Sent: Saturday, April 30, 2011 9:49:54 PM
Subject: Ray Holland paragraph

Howard,

You and I got a letter from Ray Holland. It included this paragraph:

Even though the NPS' "Compliance-Based Management Strategy" has already produced a more open and transparent federal rule-making process resulting in an exception to the nationwide no off-leash dogs in any national parks, once its dog management rule for the GGNRA has finally been adopted the process will quickly revert to a closed and opaque federal rule-making process because it will deny the public the right to be notified of the opportunity to comment on any major empirically-based changes to that rule that are subsequently considered.

Is that an accurate statement? If not, what would be?

Amy

From: Michael_B_Edwards@nps.gov
To: [Howard Levitt and Wendy Scheffers](#)
Cc: alexandra_picavet@nps.gov; chris_powell@nps.gov; [Howard Levitt](#); shirwin_smith@nps.gov
Subject: Re: REVIEW THIS VERSION Re: FAQs - core team and employee versions
Date: Tuesday, January 11, 2011 2:44:07 PM
Attachments: [DRAFT FAQs_core team011011_HL.docx](#)

One additional comment on the FAQs - change "What are the major concerns associated with allowing..." to "What are the main concerns..." Would also need to change in text below this title from major to main. We don't want to call anything "major" which has a direct connotation with the impacts analysis.

Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRPC
303.969.2694
303.638.1928 (cell)

Howard Levitt and
Wendy Scheffers
<howandwen@**(b) (6)**> To
(b) (6) Howard Levitt
<Howard_Levitt@nps.gov>,
01/11/2011 08:41 shirwin_smith@nps.gov,
AM alexandra_picavet@nps.gov,
michael_b_edwards@nps.gov,
chris_powell@nps.gov
cc

Subject
REVIEW THIS VERSION Re: FAQs - core
team and employee versions

Everyone (Chris, I'm including you for your painfully deep background: on the topic!): Please review this version of the FAQs; I made some minor changes this morning. HL

(See attached file: DRAFT FAQs_core team011011_HL.docx)

From: Howard_Levitt@nps.gov
To: Michael_B_Edwards@nps.gov
Cc: alexandra_picavet@nps.gov; chris_powell@nps.gov; [Howard Levitt and Wendy Scheffers](mailto:Howard_Levitt@nps.gov); shirwin_smith@nps.gov
Subject: Re: REVIEW THIS VERSION Re: FAQs - core team and employee versions
Date: Tuesday, January 11, 2011 4:18:59 PM
Attachments: [DRAFT FAQs 1.11.11 mbe cmts.docx](#)

Great comments, Michael - thanks. Re costs - a reporter asked us how much it cost to produce the plan. What figure can we give him? HL

Howard Levitt
Director of Communications and Partnerships
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, California 94123
phone: 415 561-4730
fax: 415 561-4710
mobile: 415 725-8589

Experience Your America

Michael B Edwards
To: Howard Levitt and Wendy Scheffers <[howandwen@\(b\) \(6\) \[REDACTED\]](mailto:howandwen@(b) (6) [REDACTED])>, Howard Levitt/GOGA/NPS@NPS
01/11/2011 12:24 cc: alexandra_picavet@nps.gov, chris_powell@nps.gov, Howard Levitt <Howard_Levitt@nps.gov>, PM EST
shirwin_smith@nps.gov
Subject: Re: REVIEW THIS VERSION Re: FAQs - core team and employee versions(Document link: Howard Levitt)

Howard,

Please see my comments attached in tracked changes. File was renamed as my computer wouldn't save a long file name.

Thanks,

(See attached file: DRAFT FAQs 1.11.11 mbe cmts.docx)

Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRPC
303.969.2694
303.638.1928 (cell)

Howard Levitt and
Wendy Scheffers

<howandwen@(b) (6)
(b) (6)

To

Howard Levitt
<Howard_Levitt@nps.gov>,
01/11/2011 08:41 shirwin_smith@nps.gov,
AM alexandra_picavet@nps.gov,
michael_b_edwards@nps.gov,
chris_powell@nps.gov
cc

Subject

REVIEW THIS VERSION Re: FAQs - core
team and employee versions

Everyone (Chris, I'm including you for your painfully deep background:
on the topic!): Please review this version of the FAQs; I made some
minor changes this morning. HL

[attachment "DRAFT FAQs_core team011011_HL.docx" deleted by Michael B
Edwards/WASO/NPS]

From: Shirwin_Smith@nps.gov
To: Howard_Levitt@nps.gov
Cc: alexandra_picavet@nps.gov; chris_powell@nps.gov; [Howard Levitt and Wendy Scheffers](#);
Michael_B_Edwards@nps.gov
Subject: Re: REVIEW THIS VERSION Re: FAQs - core team and employee versions
Date: Tuesday, January 11, 2011 5:52:27 PM

Howard - I sent you and Alex responses to the media questions, including this one, earlier this afternoon. See subject line "Responses to Questions at Media brief"

Shirwin

Shirwin Smith
Management Assistant
Golden Gate National Recreation Area
Ft. Mason, Building 201
San Francisco, CA 94123
415-561-4947 (o)
415-716-9999 (c)

Howard Levitt

To: Michael B Edwards/WASO/NPS@NPS
01/11/2011 03:42 cc: alexandra_picavet@nps.gov, chris_powell@nps.gov, Howard Levitt and Wendy Scheffers <[\(b\) \(6\)](mailto:howandwen@(b) (6))>
PM PST shirwin_smith@nps.gov
Subject: Re: REVIEW THIS VERSION Re: FAQs - core team and employee versions(Document link: Shirwin Smith)

Great comments, Michael - thanks. Re costs - a reporter asked us how much it cost to produce the plan. What figure can we give him? HL

Howard Levitt
Director of Communications and Partnerships
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, California 94123
phone: 415 561-4730
fax: 415 561-4710
mobile: 415 725-8589

Experience Your America

Michael B Edwards

To: Howard Levitt and Wendy Scheffers <[\(b\) \(6\)](mailto:howandwen@(b) (6))>

GGNRA183877

Howard

01/11/2011 12:24 PM EST Levitt/GOGA/NPS@NPS
cc: alexandra_picavet@nps.gov, chris_powell@nps.gov, Howard

Levitt

<Howard_Levitt@nps.gov>, shirwin_smith@nps.gov
Subject: Re: REVIEW THIS VERSION Re: FAQs - core team and employee

versions(Document

link: Howard Levitt)

Howard,

Please see my comments attached in tracked changes. File was renamed as my computer wouldn't save a long file name.

Thanks,

Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRPC
303.969.2694
303.638.1928 (cell)

Howard Levitt and
Wendy Scheffers
<howandwen@(b) (6)> To
(b) (6) Howard Levitt
<Howard_Levitt@nps.gov>,
01/11/2011 08:41 AM shirwin_smith@nps.gov,
alexandra_picavet@nps.gov,
michael_b_edwards@nps.gov,
chris_powell@nps.gov
cc

Subject
REVIEW THIS VERSION Re: FAQs - core
team and employee versions

Everyone (Chris, I'm including you for your painfully deep background:

GGNRA183878

on the topic!): Please review this version of the FAQs; I made some minor changes this morning. HL

[attachment "DRAFT FAQs_core team011011_HL.docx" deleted by Michael B Edwards/WASO/NPS]

From: Chris.Powell@nps.gov
To: Shirwin.Smith@nps.gov
Cc: alexandra.picavet@nps.gov; [Howard Levitt and Wendy Scheffers](#); [Howard Levitt](#); Michael.B.Edwards@nps.gov
Subject: Re: REVIEW THIS VERSION Re: FAQs - core team and employee versions
Date: Wednesday, January 12, 2011 9:12:32 AM
Attachments: [DRAFT FAQs 1.11.11 mbe cmts_ses.credits.docx](#)

Howard et al,

I've added my comments on top of Shirwins and Michaels. Good work! I'm not looking at it from a distance so my comments are in that vein.

While working on this, I just got my copy of the DEIS! This is an amazing amount of work--my hats off to you.

Chris

(See attached file: DRAFT FAQs 1.11.11 mbe cmts_ses.credits.docx)

Christine Powell
Office of Legislative and Congressional Affairs
National Park Service
(o) 202-208-3636
(c) 202-591-0660

From: Howard_Levitt@nps.gov
To: [Cleve Justis; ICE](mailto:Cleve_Justis@ICE)
Cc: Frank_Dean@nps.gov; Chris_Lehnertz@nps.gov
Subject: Re: Talking points for KQED Forum
Date: Wednesday, April 06, 2011 9:51:32 PM

Cleve: Noticed typos in the attachment - could you clean them up before printing for Jon? Thanks! HL

----- Original Message -----

From: Cleveland Justis [CJustis@ParksConservancy.org]
Sent: 04/07/2011 04:28 AM GMT
To: Howard Levitt and Wendy Scheffers <howandwen@(b) (6) >
Cc: Jon Jarvis; Howard Levitt; Frank Dean; Chris Lehnertz
Subject: Re: Talking points for KQED Forum

Thanks, Howard. I will do.

Jon, I will pick you up at 8 am in front of the lobby. I have a silver Volvo wagon. My mobile number is: 415-264-1875.

Best,
Cleve

On Apr 6, 2011, at 9:17 PM, "Howard Levitt and Wendy Scheffers" <howandwen@(b) (6) > wrote:

> Hi Cleve: Please print out the attached file for Jon. Thanks for helping get him to and from KQED - 2601 Mariposa, SF, near 17th and Bryant. In the door by 8:45, latest. HL

>

> Hi Jon: Call me on my cellphone if you need any more background or info for Forum. 415 725-8589. The host, Michael Krasny, is the consummate professional; he won't let things get out of hand in the direction of dogs or of the gov't shutdown. Good luck. HL

>

>

> <Talking Points for KQED Forum.doc>

From: [Cleveland Justis](#)
To: [Howard Levitt and Wendy Scheffers](#)
Cc: jon_jarvis@nps.gov; howard_levitt@nps.gov; frank_dean@nps.gov; chris_lehnertz@nps.gov
Subject: Re: Talking points for KQED Forum
Date: Wednesday, April 06, 2011 9:31:14 PM

Thanks, Howard. I will do.

Jon, I will pick you up at 8 am in front of the lobby. I have a silver Volvo wagon. My mobile number is: (b) (6)

Best,
Cleve

On Apr 6, 2011, at 9:17 PM, "Howard Levitt and Wendy Scheffers" <[\(b\) \(6\)](mailto:howandwen@(b) (6))> wrote:

> Hi Cleve: Please print out the attached file for Jon. Thanks for helping get him to and from KQED - 2601 Mariposa, SF, near 17th and Bryant. In the door by 8:45, latest. HL

>

> Hi Jon: Call me on my cellphone if you need any more background or info for Forum. 415 725-8589. The host, Michael Krasny, is the consummate professional; he won't let things get out of hand in the direction of dogs or of the gov't shutdown. Good luck. HL

>

>

> <Talking Points for KQED Forum.doc>

From: [Howard Levitt and Wendy Scheffers](#)
To: [Thomas A Ryckman](#)
Subject: Re: today's column
Date: Monday, January 20, 2014 3:50:58 PM

Wonderful, wonderful letter, Tom. Thank you! Howard

On Jan 20, 2014, at 3:00 PM, Thomas A Ryckman wrote:

> Dear Mr. Stienstra,

>

> I read your column regularly and usually with enjoyment. Since coming to SF in 1999, my wife and I have learned much from you about the wonderful walks in and around the Bay Area, and from your coverage of the wonders of (by Eastern standards) subtle seasonal changes in California.

>

> However today I was both disappointed and annoyed. As I understand it, the GGNRA dog leash plan has been carefully drafted to balance the interests of dog owners with a mandate that fragile natural habitats must be protected. It is not the arbitrary imposition of government whim or a ukase from a remote faceless bureaucrat. In this matter, which I have followed for some time, dog owner groups are acting like spoiled children, selfishly putting their supposed entitlement (though allegedly speaking for their pets) above the general good of the public, a good that includes passing on to future generations the few remaining strips of wildlife habitat in the Bay Area. As with other areas of environmental protection, past practice or precedent is not, and should not be, an inviolable standard going forward. I do not see, as many dog owners do, that one can legitimately speak here of an infringement of "rights". In this narcissistic society, claims about "rights" are as common as blackberries and just about as meaningful.

>

> Your remarks about government and park rangers may elicit praise from dog owners but they are irresponsible. You might ask the people of Charleston, WV about the necessity of "a lot of new rules and enforcement". And your opinion that "It is common these days that rangers do not live within the community of the parks they patrol" requires evidence. Even if true, the same could be said for many of the police and firemen working in communities in the Bay Area. You do a disservice to your readers to pander to a particular constituency on this issue.

>

> Sincerely,

>

> Thomas Ryckman

From: Frank_Dean@nps.gov
To: [Howard Levitt and Wendy Scheffers](#); [Howard Levitt](#)
Subject: Re: Wiener Hearing
Date: Wednesday, April 06, 2011 8:32:31 AM

Possible shutdown may affect our attendance.

Frank Dean
General Superintendent
Golden Gate
National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

----- Original Message -----

From: Howard Levitt and Wendy Scheffers [howandwen@(b) (6)]
Sent: 04/05/2011 09:58 PM MST
To: Frank Dean
Subject: Wiener Hearing

Hi Frank:

Spoke with Alex tonight about this - I know you're concerned; so am I. I think we will be fine if we stick with some key messages, and position ourselves as empathetic to the city's concerns and concerns of dog users in general, but firm in our commitment to manage the park to create a balance among the desires of various user groups and our mandate to protect resources into the future. We need to emphasize that everyone is contending for the same prime real estate. If we feel we can use any data from the SFSU report, we can say that while dog use is a major activity in the park, it is still a small minority of users. I think we can point out that we will listen to all comments, but that we know that the dog community is disproportionately represented in the comments. We must avoid any discussion of science - this plan is about sound, balanced public policy, but clearly reflects our need to protect known habitats of known species. On Fri, we can fine-tune the powerpoint and rehearse our talking points against the questions we know will be asked.

Howard

From: [Howard Levitt and Wendy Scheffers](#)
To: [Howard Levitt](#); shirwin_smith@nps.gov; alexandra_picavet@nps.gov; michael_b_edwards@nps.gov; chris_powell@nps.gov
Subject: REVIEW THIS VERSION Re: FAQs - core team and employee versions
Date: Tuesday, January 11, 2011 7:41:15 AM
Attachments: [DRAFT FAQs_core team011011_HL.docx](#)
[Untitled attachment 06834.txt](#)

Everyone (Chris, I'm including you for your painfully deep background: on the topic!): Please review this version of the FAQs; I made some minor changes this morning. HL

From: [Amy Meyer](#)
To: [chris_lehnertz@](#)(b) (6)
Cc: [Howard Levitt and Wendy Scheffers](#)
Subject: San Mateo dog story
Date: Wednesday, July 15, 2015 8:25:16 AM

Dear Chris,

Howard may also know this story. I heard it from Frank Dean.

I knew Dave Holland a little when he was the head of San Mateo County parks. He moved on to become Assistant County Manager and retired last year. A couple of years ago, Frank went to Dave about a 10 acre parcel of land that is within the GGNRA boundary but had not yet been acquired. Frank suggested that Dave allow it to become a dog park so that when it was acquired that would be an established use. Of course that would take off some of the dogs-run-free pressure in San Mateo County. Dave wouldn't cooperate.

I understand you are meeting with Dan Bernal right after Neal, Becky, and I do. I should be home from 2:30 until 5:15 should you wish to phone. (b) (6)

(The current San Mateo County Parks director is Marlene Finley and has a conservation background. She and Neal Desai were the only two speakers in a panel put together by Jackie Speier for a meeting about the GGNRA Dog Management Plan who dealt well with the issue.)

Best regards,

Amy

From: [Howard Levitt and Wendy Scheffers](#)
To: [Chris Lehnertz](#)
Subject: SF Chron article and reader comments
Date: Sunday, April 24, 2016 1:26:32 PM

Chris, check out SF Gate for the Mighty Mutt March article and reader comment. Very revealing. Howard

<http://www.sfgate.com/bayarea/articleComments/Dogs-owners-unleash-protest-of-proposed-7305701.php>

From: [Howard Levitt and Wendy Scheffers](#)
To: [Frank Dean](#); shirwin_smith@nps.gov; alexandra_picavet@nps.gov
Subject: Slides for Supe Hearing
Date: Sunday, April 10, 2011 9:20:48 PM
Attachments: [Slides for SF supe hearing.doc](#)
[Untitled attachment 08411.txt](#)

Frank, Shirwin and Alex:

Attached are some slides I thought would best make our case in a step-by-step, yet concise, way. Please let me know your thoughts - the text will need to be tightened on several of the slides, and I want to review them against the Steven Krefting, et al, and Jan Blum letters for completeness. I will be in around 8:00 AM tomorrow to chat with you (Alex) about creating these slides.

On Sat, I heard a KGO talk show program about the GOGA dog issue while I was waiting in line at the post office. Balanced comments from callers; total bias from the host. He told his listeners to show up on Mon.

Howard

From: [Amy Meyer](#)
To: [Howard Levitt and Wendy Scheffers](#)
Subject: Stienstra today
Date: Monday, January 20, 2014 10:42:21 AM

Hi Howard,

Thanks to Rich Bartke who was writing to me about something else I saw the dog rant in Stienstra's column on p. B2 today.

unhappily,
Amy

From: [Levitt, Howard](#)
To: [Wendy Scheffers](#)
Subject: stuff
Date: Sunday, February 21, 2016 4:28:15 PM
Attachments: [Comm Plan on Proposed Rule V5 21Feb2016 FINAL.docx](#)
[2 21Proposed Rule--FAQ \(1\).pdf](#)
[pre-briefing schedulexlsx.xlsx](#)

--

Howard Levitt
Director of Communications and Partnerships
Golden Gate National Parks
howard_levitt@nps.gov
415-561-4730

Talking Points on dog access at GGNRA sites in San Francisco

- Proposed Rule for Dog Management at GGNRA relaxes the National Park systemwide pet regulations to permit off-leash dog walking in a national park unit. Under the proposed rule, GGNRA would remain the most dog-friendly national park site in the nation.
- From the beginning of the 14-year long process to develop a rule for dog walking in GGNRA, the park has examined every area where dog walking currently occurs with the goal of determining how this healthy activity can continue to occur under commonsense management. Of the nine sites in San Francisco, dog walking is permitted in substantial parts of each site.
- Five areas in San Francisco were identified for off-leash dog use: Fort Mason, Crissy Field (two areas); Ocean Beach; and Fort Funston (two areas).
- At Fort Funston, the most popular area in San Francisco for dog walking, over 40% of the usable space would remain open to off-leash dog walking, including the entire 1-mile beach front below the cliffs. In addition, the vast majority of the trails would be open to dogs on leash. Areas where dog would not be permitted would significantly improve safety for equestrians, hang gliders, the San Francisco school children who use the SFUSD environmental education center, and also allow those who currently avoid Fort Funston because they want a dog-free experience to return to the site.
- At Crissy Field, dogs will be permitted almost everywhere, including the airfield, the promenade, the picnic area at the east end, and nearly $\frac{3}{4}$ mile of beach. Off leash use would be permitted on approximately 30% of the airfield and 40% of the beach front mileage.
- What had been seen by the public as a draconian approach to responding to non-compliance in the original draft dog plan has been replaced by an approach to work with the public to keep sites open through actions such as outreach, education, additional fencing, increased buffer zones, and an off-leash certification program.
- NPS has indicated its desire to continue working with SFRPD to address the shared issue of dog management, which is a challenging issue for city parks as well as the GGNRA.

From: [Howard Levitt and Wendy Scheffers](#)
To: cjustis@parksconservancy.org; jon_jarvis@nps.gov
Cc: howard_levitt@nps.gov; frank_dean@nps.gov; chris_lehnertz@nps.gov
Subject: Talking points for KQED Forum
Date: Wednesday, April 06, 2011 9:19:50 PM
Attachments: [Talking Points for KQED Forum.doc](#)

Hi Cleve: Please print out the attached file for Jon. Thanks for helping get him to and from KQED - 2601 Mariposa, SF, near 17th and Bryant. In the door by 8:45, latest. HL

Hi Jon: Call me on my cellphone if you need any more background or info for Forum. 415 725-8589. The host, Michael Krasny, is the consummate professional; he won't let things get out of hand in the direction of dogs or of the gov't shutdown. Good luck. HL

From: Alexandra.Picavet@nps.gov
To: Howard.Levitt@nps.gov; [howandwen@\(b\) \(6\)](#)
Subject: talking points
Date: Wednesday, April 06, 2011 6:11:01 PM

Sorry Howard. Glad to help.
Alex

Talking points –Dog management

This accommodation of regulated off-leash recreational use-- not allowed anywhere else in the NPS-- is in direct response to, and recognition of GGNRA's unique situation and public input.

NPS is willing to consider some regulated off-leash use, but must also adhere to the conservation mandate of the agency and federal laws.

Recreation is a multifaceted thing. The NPS must manage the competing interests of the many user groups that are drawn to parks in a fair and balanced way.

NPS must be able to adjust management over the 20-year life of the plan if impacts are greater than expected – be that impacts on other user groups or resources.

The extraordinary steps taken by GGNRA to get to this point shows clear intent of trying to achieve balance and hear all voices and years of work.

Golden Gate NRA saw more than 300,000 participants in athletic special events last year including swimming, kayaking, running, and triathlon activities. Some of these events— like the historic Dipsea run— have been occurring for more than 100 years.

Talking points –America's Cup

The NPS is a significant community member in the Bay Area. The partnership of the NPS with the City of San Francisco and the event organizers will make this event the most accessible to a wide variety of people it has ever been. (usually out in the ocean and impossible to truly watch from shore)

By increasing the accessibility to this event through viewing opportunities on Golden Gate NRA land, the relevancy (and excitement)

of the America's Cup, and sailing in general, is being enhanced for future generations.

The NPS is working with the city of San Francisco and event organizers to allow for optimum viewing access to the public while staying true to our mandate to protect the natural and cultural resources as well as visitor experience we have been entrusted with.

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From: [Howard Levitt and Wendy Scheffers](#)
To: [Wendy Scheffers](#)
Subject: talking points
Date: Tuesday, March 01, 2016 2:34:12 PM
Attachments: [Talking Point re SF dog access.docx](#)

From: [Thomas A Ryckman](#)
To: tstienstra@sfchronicle.com
Subject: today's column
Date: Monday, January 20, 2014 3:00:47 PM

Dear Mr. Stienstra,

I read your column regularly and usually with enjoyment. Since coming to SF in 1999, my wife and I have learned much from you about the wonderful walks in and around the Bay Area, and from your coverage of the wonders of (by Eastern standards) subtle seasonal changes in California.

However today I was both disappointed and annoyed. As I understand it, the GGNRA dog leash plan has been carefully drafted to balance the interests of dog owners with a mandate that fragile natural habitats must be protected. It is not the arbitrary imposition of government whim or a ukase from a remote faceless bureaucrat. In this matter, which I have followed for some time, dog owner groups are acting like spoiled children, selfishly putting their supposed entitlement (though allegedly speaking for their pets) above the general good of the public, a good that includes passing on to future generations the few remaining strips of wildlife habitat in the Bay Area. As with other areas of environmental protection, past practice or precedent is not, and should not be, an inviolable standard going forward. I do not see, as many dog owners do, that one can legitimately speak here of an infringement of "rights". In this narcissistic society, claims about "rights" are as common as blackberries and just about as meaningful.

Your remarks about government and park rangers may elicit praise from dog owners but they are irresponsible. You might ask the people of Charleston, WV about the necessity of "a lot of new rules and enforcement". And your opinion that "It is common these days that rangers do not live within the community of the parks they patrol" requires evidence. Even if true, the same could be said for many of the police and firemen working in communities in the Bay Area. You do a disservice to your readers to pander to a particular constituency on this issue.

Sincerely,

Thomas Ryckman