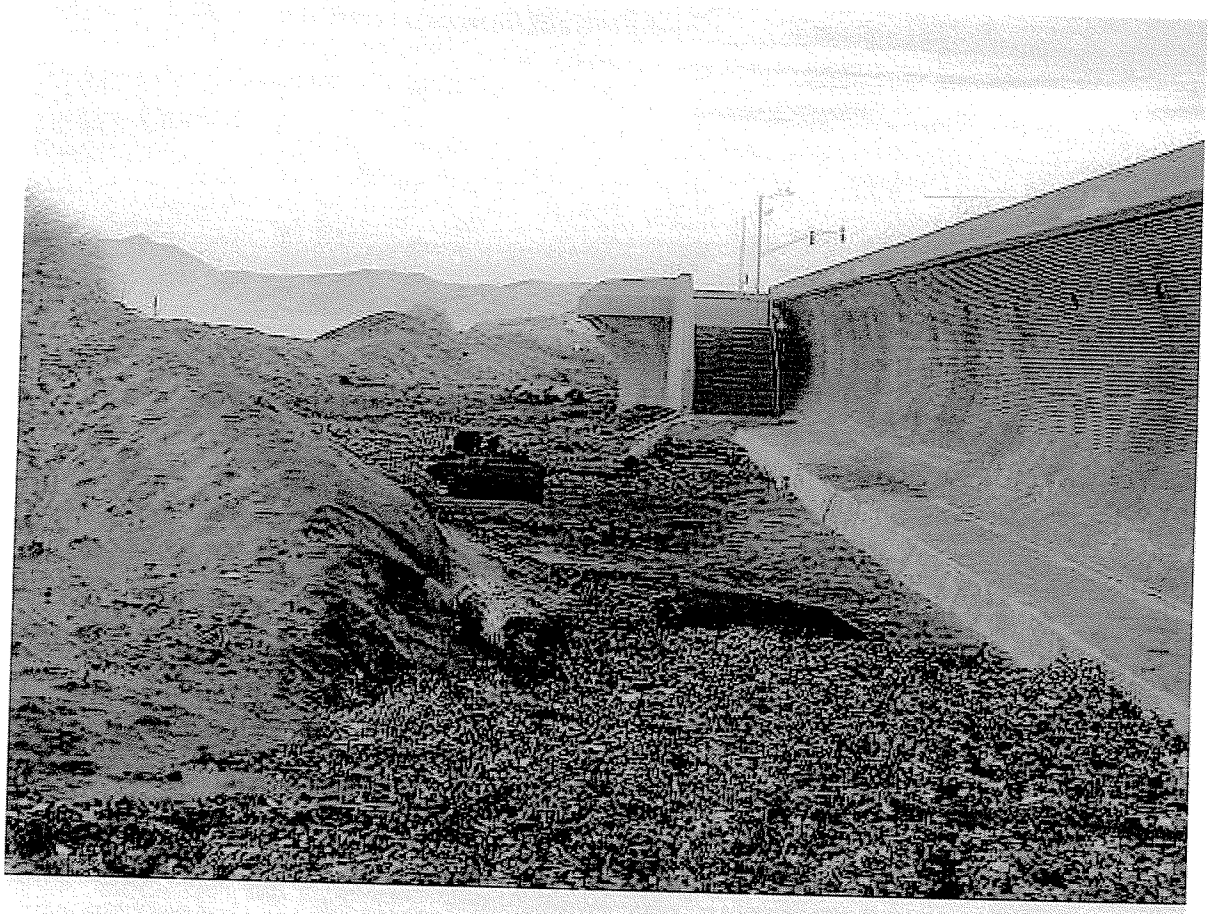
As you can see, the sand dunes slope up to a seawall that runs from Noriega Street south to a spot somewhere between Rivera and Santiago Streets. However, in the summer of 2007, the GGNRA undertook a project to move sand out of this area, in order to prevent erosion at Ocean Beach and also prevent the blowing of sand in those dunes on to the seawall and up on to the Great Highway, which runs parallel to Ocean Beach. However, as the following photos will show, this excavation of sand destroyed the WSP habitat.

The audacity of the GGNRA to now proceed to eliminate off-leash recreation on this portion of the beach under the premise that off-leash dogs disturb the WSP is ridiculous, considering the GGNRA has destroyed the WSP habitat. The GGNRA's own studies show erosion of the beach and habitat loss has a much greater detrimental effect upon the WSP than the *occasional* disturbance of the WSP by off-leash dogs. This proposed Rule will not meet the desired objective of protecting the WSP, is patently discriminatory, and therefore unlawful. This Proposed Rule should be summarily rejected.