

Appendix I



United States Department of the Interior

OFFICE OF THE SOLICITOR
Washington, D.C. 20240



IN REPLY REFER TO:

Arnita Bowman
2130 Crestmoor Dr.
San Bruno, CA 94066

May 17, 2011

Dear Ms. Bowman:

This responds to the April 25, 2011, e-mail message that you sent to the Department of the Interior ("Department") intending to file a Freedom of Information Act ("FOIA") appeal concerning three FOIA requests that you submitted to the National Park Service ("NPS"), which each seek various documents generally related to Golden Gate National Recreation Area ("GGNRA"). The Department received your e-mail message on April 26, 2011, and it has opened three separate FOIA appeal files to correspond with each of the FOIA requests that are the subject of your appeal. FOIA Request No. #NPS-2011-00361 is assigned as Appeal Number 2011-097. FOIA Request No. #NPS-2011-00362 is assigned as Appeal Number 2011-098. FOIA Request No. #NPS-2011-00363 is assigned as Appeal Number 2011-099. Please cite the appropriate FOIA Appeal Number in any future correspondence that you send to the Department regarding these appeals.

You filed this appeal because you are "concerned with the NPS's failure to expedite [the] request[s] based on the GGNRA Draft Dog Management [Draft Environmental Impact Statement ("DEIS")] public comment timeline and the failure to notify [you] (as required by regulation) of the decisions regarding [your] expedition requests." You also note your "concern[] with the NPS withholding the current draft of the GGNRA general plan based on the claim of 'PREDECISIONAL DRAFT - NOT AVAILABLE FOR PUBLIC DISTRIBUTION'..." in partial response to FOIA Request No. NPS-2011-0363. You assert that you "can not find anywhere in the FOIA regulations that this is a legal justification for withholding the information from the public."

Expedited Processing

Expedited processing, if granted, gives a FOIA request priority and the FOIA and the Department's FOIA regulations ("regulations") require a bureau to process the request "as soon as practicable." See 5 U.S.C. § 552(a)(6)(E)(iii) and 43 C.F.R. § 2.14(d).

In the case of your FOIA requests, the NPS has already started processing each of them and it has released some of the responsive documents to you. Indeed, in an April 19, 2011, e-mail message to you, the NPS advised that it "will provide additional information as soon as [it] receive[s] it from those who are undertaking the searches for the requested information." While the NPS did not explicitly state in its correspondence to you regarding the FOIA requests that it granted your requests for expedited processing, the

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fact that it has already released responsive documents for each one should have made it clear that your requests are currently being processed. Accordingly, there is no action for the Department to take on your requests for expedited processing, as the issue of whether the NPS will give your requests "priority" and process them "as soon as practicable" is moot.

Withholding of the "Current Draft of the GGNRA General Plan"

As noted above, the NPS advised you in its correspondence concerning FOIA Request No. NPS-2011-0363 that a responsive document is "PREDECISIONAL DRAFT" and "NOT AVAILABLE FOR PUBLIC DISTRIBUTION." The Department concludes that this issue is not ready for review by this Office.

The regulations require a bureau that denies a request for records in whole or in part (i.e., withhold a document in full or withhold any information from that document) to include the following information in its letter responding to the FOIA request:

- (1) A reference to the specific exemption or exemptions authorizing the withholding;
- (2) An explanation of the reason(s) for the denial;
- (3) An estimate of the volume of information being withheld...unless such an estimate would harm an interest protected by the exemption used to withhold the information[.];
- (4) The name(s) and title(s) of the person(s) responsible for the denial;
- (5) The name and title of the Office of the Solicitor attorney consulted; and
- (6) A statement that the denial may be appealed to the FOIA Appeals Officer...in accordance with the requirements in §2.29

The NPS did not provide you with any of the above information required by the regulations. The deficiencies with the NPS's response to you regarding the "current draft of the GGNRA general plan" requires the Department to remand this item to the NPS for it to send you a new response regarding its release, as the NPS's correction of the above deficiencies could resolve the issue you raised in the appeal concerning the withholding of the document. For example, after consulting with an attorney in the Office of the Solicitor, the NPS may conclude that the draft (or portions of the draft) is not protected from disclosure by any FOIA exemption and release it to you. The NPS could also determine after consultation that the document is in fact protected from disclosure under the FOIA, but its new response to you will cite to the FOIA exemption that it believes protects the document.

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Therefore, to resolve the issue in the appeal regarding the NPS's withholding of the "current draft of the GGNRA general plan," by copy of this letter, the Department is remanding this matter to the NPS for it to send you a new response that complies with the regulations. If the NPS determines to invoke a FOIA exemption to deny you access to any portion of the "current draft of the GGNRA general plan," its new letter responding to you will contain all of the information the regulations require it to advise a FOIA requester of when a bureau makes such a determination, e.g., a reference to the specific exemption or exemptions authorizing the withholding and the name and title of the Office of the Solicitor attorney consulted. *See 43 C.F.R. § 2.21(d)(1)-(6).*

The NPS is further directed to issue its new response to you regarding the "current draft of the GGNRA general plan" within 10 workdays of the date of this letter. The NPS will correspond directly with you on this matter, with a copy of its letter to this Office. If you are dissatisfied with the NPS's new response to this issue, you may file another appeal in accordance with the procedures set forth in the Department's FOIA regulations found at 43 C.F.R. § 2.28 – 31.

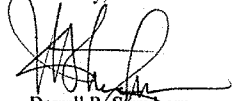
Other Matters

You express your concern in your April 25, 2011, e-mail message that you will not have the requested information "in time to provide the public with information for providing a fully informed response to the DEIS." You state that you believe "the delays by the NPS should be grounds for extending the DEIS public response period."

You raised this same issue in a previous FOIA appeal that you filed with the Department, an appeal that the Department assigned as FOIA Appeal Number 2011-074 and issued a determination on in a letter dated March 30, 2011. As the Department concluded in its decision on your previous FOIA appeal, "[y]our concern here falls outside of the scope of the provisions of the FOIA and, thus, outside of the authority that this Office has to assist you. As such, there is no action for the Department to take on this issue." There is no basis for the Department to divert from its previous response to you on this matter.

This completes the Department's response to your appeals. If you have any questions, you may contact me at (202) 208-5339.

Sincerely,



Darrell R. Strayhorn
FOIA Appeals Officer
Department of the Interior

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cc: Charis Wilson, FOIA Officer, NPS (FOR ACTION)
Kevin Killeen, Pacific West Regional FOIA Officer, NPS
Howard Levitt, GGNRA FOIA Officer, NPS
Alexandra Mallus, Departmental FOIA Officer

Timeline Summary for FOIA Requests for Arnita Bowman

As of 4/25/11

Date	Event	Description
4/25/11	FOIA Appeal for FOIA 1, 2, & 3	DOI Appeal for data missing from FOIA 1, 2, & 3
4/22/11	FOIA Request for Clarification	New FOIA request related to informal inquiry on 4/6/11 - Clarification requested: Animal & Wildlife, Class 2, and Animal Protection plus DEIS schedule showing specific cases
4/16/11	Partial Receipt for FOIA 2, 3, & 4	Partial responses to your FOIA requests # NPS2011-00361; 00362; 00363
4/15/11	Update on FOIA Request	From Howard Levitt's: I wasn't able to look over the materials that Skot has prepared for you. Should be able to on Monday, and hope to send you a package of additional information then. Thanks for your patience. Howard
4/6/11	Informal Request for Clarification	Clarification requested: Animal & Wildlife, Class 2, and Animal Protection
4/1/11	Received data for FOIA 1 - Complete	Received data for FOIA NPS-2022-00257 and Appeal No. 2011-074
4/1/11	Response to Status Request	Howard Levitt Response to FOIA Status Request: Our priority has been to complete our response to FOIA NPS-2011-00257, and the recommendations in the response to your appeal from Ms. Strayhorn. I will send you a response on that FOIA by Monday, April 4, 2011. Re FOIAs NPS 2011-00361, 00362 and 00363, we are continuing to research responses to all of the information and documents you have requested. Please understand that much of what you request will require considerable staff time, but please be assured that we are dedicating time to your request each week, and will release information to you as quickly as it becomes available. We hope to make a partial release of information sometime next week.
3/30/11	Status Request	FOIA Status Update Request: NPS-2011-00361/NPS-2011-0362/NPS 2011-00363
3/30/11	Decision on Appeal	Decision on Your Freedom of Information Act Appeal (No. 2011-074)
3/25/11	Reviewed the 2007-2008 NPS Incident Reports	Downloaded and analyzed the 2007-2008 NPS law enforcement tickets. The tickets counts are less than the law enforcement numbers in the DEIS for 2007-2008.
3/18/11	FOIA 4: Notice from Linda	Received an e-mail from Linda McKay saying GGNRA provided tickets via a portal. This was not from the GGNRA. Per Linda's

	McKay, Fort Funston dog group saying 2007-2008 tickets available	email: For Arnita: the 2007/2008 law enforcement data has been provided, and 2009/2010 is coming next week. If you still aren't getting a response to your FOIA request, maybe you asked for something different? The incident reports are at http://www.nps.gov/goga/siteindex.htm - scan for "FOIA" If you need help reviewing these and entering into a data base, let me know. We might get interns to help - I've used spca volunteers before to do this.
3/14/11	FOIA 2,3,4: Confirmation of Receipt of FOIA Requests	e-mail from Kevin Killeen confirming that the National Park Service received the request on 2/28/06 FOIA: NPS-2011-00361 - Visitation and Environment Inventory Information Requests (FOIA 2) FOIA: NPS-2011-0362 - Ranger Tickets & Public Health Information (FOIA 3) FOIA: NPS-2011-00363 - Financial Information and General Management Plan (FOIA 4)
3/14/11	FOIA 2,3,4: Called Kevin Killen (NPS Western Region FOIA Representative)	Phone discussion with Mr. Killeen regarding not receiving a confirmation of the receipt of my FOIA requests and requesting information regarding expected time to process the requests. I was told that the NPS has spent considerable time reviewing the tickets requested by the anti-dog movement. He mentioned that he was the 3 rd reviewer of the 800+ tickets per year that was required to remove the personal information. I expressed concern that the NPS was willing to spend that much time on the anti-dog FOIA requests but not provide me with the information I requested. He said that several people had requested the tickets, implying that made it a high priority. I explained that I was working with the dog community and that we'd tried to centralize our request. I asked if we should have multiple people submit the same FOIA request, and he was not supportive of that idea. He mentioned that he knew I'd prioritized my request in the FOIA requests but that the Howard Levitt would probably want me to prioritize further and said Howard would contact me. Mr. Levitts has not contacted me.
3/14/11	FOIA 3,4: Submitted FOIA Requests	Submitted FOIA Request to Kevin Killen (NPS Western Region FOIA Representative) and to Howard Levitts (GGNRA FOIA Representative)

FOIA: NPS-2011-0362 - Ranger Tickets & Public Health Information (FOIA 3)
FOIA: NPS-2011-00363 - Financial Information and General Management Plan (FOIA 4)

3/10/11	FOIA 1: Received acknowledgement of FOIA Appeal Receipt	Received a message from FOIA.APPEALS@sol.doi.gov Ms. Bowman, the Department of the Interior's FOIA Appeals Office is in receipt of your e-mail submissions. The information you have provided is currently being reviewed. You should expect correspondence from the FOIA Appeals Officer shortly. From: LaRima L. Lane, Esq. TKC Global Contractor Department of the Interior FOIA Appeals Office Phone: (202) 208-5339 Fax: (202) 208-6677
3/4/11	FOIA 1: Sent Concern Regarding FOIA Appeal to Speier's Office	Sent concern about the Interior Department not responding to my appeal.
3/2/11	FOIA 2: Removed 2 Line Items from FOIA	I removed two items from my FOIA request because I received information during discussion with the Rangers during the DEIS Open House in Marin. FOIA2: NPS-2011-00361 - Visitation and Environment Inventory Information Requests
3/2/11	FOIA 1: Confirmed data available and asked for confirmation of appeal status	Sent email to FOIA Appeal e-mail, Howard Levitts & Kevin Killeen e-mail stated: I confirmed at the Marin Open House for the DEIS that the GGNRA does input the data I'm requesting into an Access database with the location, incident/offense, and date . I spoke with a ranger but unfortunately didn't get her name. Please respond to my email and let me know the status of my appeal. Submitted FOIA Request 2 to Kevin Killen (NPS Western Region FOIA Representative) and to Howard Levitts (GGNRA FOIA Representative) FOIA: NPS-2011-00361 - Visitation and Environment Inventory Information Requests (FOIA 2)
2/28/11	FOIA 2: Submitted FOIA 2 Request	

2/25/11	FOIA 1: Submitted Appeal to the Department of Interior	Sent e-mail appeal to foia.appeals@sol.doi.gov FOIA APPEAL FOR NPS-2011-00257 Along with specific request included: "My impression is NPS is not dealing equally with both side of the dog management concern and is fully supporting the natural resource conservancy contingency no matter the cost but delaying requests by the pro-dog contingency or requests that may not support the Preferred Alternative. I do not feel I am being treated fairly and am concerned about the NPS FOIA process. I made this request soon after the DEIS was made public. However, I am concerned that I will not have the information in time to provide the public with information for providing a fully informed response to the DEIS. I believe the delays by the NPS should be grounds for extending the DEIS public response period."
2/25/11	FOIA 1: Received NPS Final Response	Received cd in the mail for FOIA # 2011-00257 - Warnings, Tickets, and Incident Reports. See description below.
2/23/11	FOIA 1: NPS sends Final Response	Received response without data for FOIA # 2011-00257 - Warnings, Tickets, and Incident Reports Key excerpts include: Included confirmation of an "access" database with data entry only and very limited search parameters Fields available include: Case number, time, date, incident/offense, description of location, and officer name Hours: States electronic query is unavailable, estimated staff time is 300 to 500 hours (<i>Note that from my personal experience, it should only take a support person an hour or so to download the Access data and most of that is coordination.</i>)
2/11/11	FOIA 1: Follow-up e-mail from Skot on request	FOIA # 2011-00257 - Warnings, Tickets, and Incident Reports 2-11-11 Response to Follow-up by NPS-SKOT- from FOIA 1
2/2/11	Follow-up e-mail on request	Sent e-mail clarifying my request based on discussions with Skot Jonz (Howard Levitt's representative)
2/1/11 or thereabouts	Phone discussion with Skot Jonz, NPS representative	FOIA # 2011-00257 - Warnings, Tickets, and Incident Reports During a phone conversation: Skot explained that the NPS was already pulling approximately 800 dog and pet related incident/offense GGNRA ranger tickets based on another FOIA request. Those tickets would soon be available to all of the public and he requested that I remove my FOIA request for

that areas. I assumed the NPS was acting in good faith, and didn't want to put an unnecessary burden on the agency so I agreed to cancel my FOIA for the detailed Ranger tickets. He mentioned that it was taking a lot of time because each ticket had to be manually pulled and then the personal information removed and then those tickets have to go through multiple reviews. *(Apparently, they are doing this for 5 years at 800 tickets a year.)* I expressed that I thought the ranger details on Leash Law incidents/offenses wasn't likely to provide much insight, and I was surprised that they were going to this level of effort. I'm surprised that people would question the validity of the Leash Law tickets or the detailed tickets would provide much information for either side. *(After reviewing those tickets for 2007 and part of 2008, I still question the value of pulling some 600+ tickets per year or why that would be prioritized over providing the public with the detailed ranger reports that would provide insight. Dog Bite/Attacks, disturbing wildlife, etc. have details that provide insight on the severity of the incidence. The only insight from Leash Law tickets is whether the violators were cooperative or not and the type people breaking the law (e.g., families, seniors, hikers, etc.).*

Skot told me about a dog owners leg that was opened up and then about a hand-glider that was a dog grabbed as the hand-glider was taking off. (I haven't seen either in the 2007 to 2008 tickets that have been made available to the public.)

I explained to him my purpose for the database records and explained that SFDog had already received the same information for 2001 to 2006, and he insisted the data records were not available but that he would check with other NPS personnel.

1/26/11

Acknowledgment
of FOIA 1 Request

Received immediate e-mail acknowledging receipt.

We have received your FOIA request. We will review it and get back to you if we need additional clarification.

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

1/26/11

Submitted FOIA 1
Request

Submitted FOIA Request 2 to Howard Levitts (GGNRA FOIA
Representative)

FOIA # 2011-00257 - Warnings, Tickets, and Incident Reports
Requested

Summary:

I am sending you a Freedom of Information Act email request for documents pertaining to known violations and injuries in the GGNRA and the Presidio. My purpose is to evaluate the significance of any known dog-related incidents in the parks in comparison to other human activities and injuries in the park. I do not want personal information for violators or victims.

- Database records on violations and injuries in the GGNRA or the Presidio
- All officer notes pertaining to the dog bite, injury, rescue, wildlife disturbance, and attack events for 2007, 2008, and 2010

Freedom of Information Request for Arnita Bowman

As of 4/25/11

FOIA Request		Original Specific Request or Background Information	
Request Date: 3/14/2011 FOIA: NPS-2011-0363 - Financial Information and General Management Plan (FOIA 4)			
Received 4/21/2011 (38 days)		Request #A related to the Cost of the GGNRA Dog Management Plan: <ul style="list-style-type: none">• The summary of actual expenditures for this GGNRA dog management plan project fund for as many years as is available (please include expenditures for all phases of the project even if the project funding is split by different phases). If a summary is not available, please provide the detailed expenditures.• The approved budgets/fund showing the total cost (actual/projected) for the GGNRA dog management plan project (including all phases) for as many years as is available.• Hours and overtime costs for the DEIS Public Open House Meetings, if not in 2 above.	
Received 4/21/2011 (38 days) the 1980 GGNRA General Management Plan (GMP) and the timeline for the future GMPs		Request #B regarding the GGNRA General Management Plan: <ul style="list-style-type: none">• The active GGNRA General Management Plan, if any• The current draft of the proposed GGNRA General Management Plan Reference: http://parkplanning.nps.gov/document.cfm?parkID=303&projectID=15075&documentID=28961.• Most recent GGNRA internal status update on the GGNRA General Management Plan with the projected timeline for future activities and implementation	
Withheld - The current draft of the proposed GGNRA General Management Plan – claim cannot provide because "PREDECISIONAL DRAFT - NOT AVAILABLE FOR PUBLIC DISTRIBUTION"			
Withheld		Request #C regarding GGNRA Budgets: <ul style="list-style-type: none">• 2011 GGNRA approved budget summary for all funds (e.g., general, special, revolving, etc.) managed by the GGNRA	
Request Date: 3/14/2011 FOIA: NPS-2011-0362 - Ranger Tickets & Public Health Information (FOIA 3)			
1) Received 4/21/2011 (38 days). – Completed but unverified – Not yet visited GGNRA reading room		All formal GGNRA tickets, warnings, or complaints regarding dog bites/attacks, rescues, closed areas, and wildlife disturbances.	
Received notice that the 2009 and 2010 ranger tickets were available in the GGNRA		Note that this relates to my initial FOIA request on 2/28/2011 that the NPS assured me would be made available to everyone. They did not tell me that it would take nearly 3 months and that only 2007 and 2008 would be available.	

reading room.	
2) Received On 3/18/2011 (4 days) I was notified by another dog owner that the 2007 to 2008 PDFs were available on the GGNRA website. The 2007 to 2008 PDFs of ranger tickets shows that dog bite/attack incidents are rare and mostly nuisance type incidents and wildlife disturbances are rare.	
Withheld	Any documentation of informal complaints regarding dog bites/attacks, rescues, closed areas, wildlife disturbances, or other injuries to people or wildlife by dogs.
Withheld	Any documentation of actual disease/illness transmission from dogs to people in the GGNRA.
Request Date: 2/28/2011 FOIA NPS-2011-00361 Visitation, Survey Data, Evidence of DEIS impacts	
Received 4/22/2011 - <u>Completed</u> Provided link to pre-existing on-line <u>website</u> : http://www.nature.nps.gov/stats/park.cfm?parkid=296	A: Visitation Counts <ul style="list-style-type: none">• GGNRA detailed procedures or method for calculating visitation for the overall park and for specific DEIS scope park areas• GGNRA summaries of overall park and specific DEIS scope park area visitation for 2008, 2009, and 2010 <p>My purpose is to understand why the GGNRA annual visitation numbers at 15 million seems to be significantly lower than one would expect when calculating the 37 million expected dog visitors using the 2002 Phone Survey and the 2008 Census Data.</p> <p>I also want to understand the actual visitation for each of the park areas included in the DEIS.</p>
Received 4/22/2011 - <u>Completed</u> Provided unreadable files unless one has access to proprietary software instead of in the requested common format such as excel, comma delimited, etc. Fortunately, I knew someone with the proprietary software otherwise the files would have been useless.	B: Detailed Data Records for Each Call from the 2002 Public Opinion Research Telephone Survey Regarding Golden Gate National Recreation Area Pet Management Issues <p>I am requesting the unfiltered, detailed survey answers to each question in an electronic data format such as excel, a comma delimited file, or other common data formats. The electronic data records should include the data field headers that indicate the content of the fields. If available, please provide the phone questioning call script and any supporting documentation that explains the contents of the data field.</p> <p>As background, my purpose is to understand the GGNRA visitation patterns of dog people in comparison to non-dog people and those that dislike dogs or off-leash dogs. I also want to understand the "recreational" GGNRA visitation patterns of the Bay Area population. Based on my calculations from the survey results, it seems that the park is visited far more than 15 million times per year for recreation.</p>
Withheld	C: Park Surveys with Visitor Experience Questions <ul style="list-style-type: none">• A list of known surveys conducted regarding visitor experience related to any of the park areas within the

	<p>scope of the DEIS. (e.g., Research to Support Visitor Management at Muir Woods National Monument and Muir Beach)</p> <ul style="list-style-type: none"> The summaries of the visitor responses with the questions, response counts, and any visitor notes. <p>My purpose is to understand the actual responses and to put those in context.</p>
Withheld	<p>D: Week 2006 Communication</p> <p>Personal communication 2006 regarding Health and Human Safety. Reference from the DEIS.</p>
<p>Cancelled. I spoke with rangers at the Marin open house and cancelled.</p> <p>The rangers were not aware of any quail on Sweeney during the open house. The ranger thought wood rats was an example of ground dwelling animals that would be impacted by dogs on Sweeney. After researching on the internet, I found out wood rats are nocturnal and have dense stick habitats that are hard to find. It's highly unlikely dogs are impacting quail or wood rats on Sweeney. If wood rats are on Sweeney Ridge, they would not be easily accessible by pet dogs hiking the trails.</p> <p>As a follow-up, Ranger LaSalle, while giving me a leash law ticket, indicated to me on March 27th that he sees quail often on the upper ridge area. However, he also indicated that he sees dogs chasing bobcats and the GGNRA law enforcement data for the past 10 years shows no cases of dogs disturbing wildlife.</p>	<p>E: An example of GGNRA evidence (e.g., inventories, email, ranger reports, etc.) of quail or other ground dwelling birds currently existing in San Mateo County GGNRA Park Areas.</p> <p>As background for my request, I have seen quail in Marin County parks, that allow dogs, but never in the San Mateo GGNRA parks. My understanding is that the California Quail has to be near a fresh water source which is not the conditions along the Milagra or Sweeney Ridge trails. I have never even seen quail along the San Andreas Fault trails which don't allow dogs and has fresh water nearby. I have seen references to quail at places such as the Bog Trail that winds through San Bruno Mountain Park's "Saddle Area," a wet, riparian area at the foot of the mountain. However, quail and ground-dwelling birds are used as one reason for the Sweeney Ridge moderate adverse impact.</p> <p>I see no evidence at Sweeney Ridge of even minor impacts to wildlife caused by the 0.5 % of the park that is trails used for recreation and that often have off-leash dogs. Instead, I see a thriving population of birds, reptiles, ground-dwelling rodents, deer, and rabbits along the trail and have seen mountain lions, coyotes, and bobcats, which indicate a healthy eco-system. The quail question is my nagging doubt.</p> <p>For this request, the name of a ranger that can discuss the quail, ground dwelling activity in San Mateo county would be sufficient.</p>
Withheld	<p>F: Any quantifiable measurement guidelines used internally by the NPS for determining negligible, minor, moderate, or major adverse impacts in the DEIS.</p> <p>For example, I'm looking for percentage of vegetation degradation that would indicate a certain adverse impact category in the DEIS. For example, I doubt that more than 0.5% of Sweeney Ridge shows any degradation from human or dog recreational activities and most of that 0.5% is just the fire roads and those are required for park management.</p>
Withheld	<p>G: Any evidence of diseases transmitted to people, children or wildlife due to dogs in the GGNRA</p> <p>The DEIS indicates that dogs "may" transmit diseases via feces to people or children and canine disease transmission. Is there any known GGNRA (e.g., reports, emails, etc.) evidence linking actual disease transmission to people or animals that was used to support the DEIS impact statement? If so, please provide.</p>

Withheld	<p>H: Summary reports from any wildlife, soil, or vegetation inventories or monitoring performed for Sweeney Ridge or Cattle Hill, including Notch Trail.</p> <p>I see little visible evidence of any more than negligible impacts on Sweeney Ridge from human or dog recreational activities.</p>
Withheld	<p>I: Any evidence (e.g., emails or ranger reports) of any dog activity along Sweeney Notch Trail (e.g., emails, ranger reports, etc.) supporting the minor adverse impact of dogs on the Mission Blue Butterfly.</p> <p>I'm not aware that any dogs or at most a few dogs are going to this area of the park.</p> <p>For this request, the name of a ranger that can describe dog activity on the trail would be sufficient and I will contact them for a brief discussion.</p>
<p>Cancelled. During the Marin open house, I was told by a ranger that the indication of owls spotting fledglings on the ground was a few cases of dog owners rescuing fledglings.</p>	<p>K: The evidence of dogs spotting northern spotted owl fledglings on the ground and altering owners to the fledglings (pg 1112) and any evidence of injury to the fledglings by the dogs.</p> <p>I've looked at the data on the website and see nothing in regards to dogs impacting the owl. In fact these populations of owls seem to be doing quite well and these areas have off-leash dogs. Looking at the web, biologists in California actual use tracking dogs to complete their inventories of the owl; which to me indicates that dogs represent and insignificant risk to the owl.</p>
Withheld	<p>M: Any soil testing indicating significant soil degradation due to dog feces</p> <p>The DEIS indicates that dogs may degrade the soil due to feces. Is there any known GGNRA (e.g., reports, emails, etc.) testing evidence supporting the DEIS impact statement related to feces accumulation and any significant changes in a park area's soil composition? If so, please provide.</p>
<p>Received on 4/22/2011:</p> <ul style="list-style-type: none"> 2000 MBB Survey Milagra Ft Funston USGS VegReport 2004 Winter 2001-2002 Waterbird Survey Report <p>Withheld: Any current or comprehensive inventories or monitoring with any indication of dog impacts. Only one of the references from the DEIS was provided and nothing supporting their conclusions.</p>	<p>N: Summary reports from any wildlife, soil, or vegetation inventories or monitoring performed in the park areas within the scope of the DEIS that support the DEIS claims of the "No Action" alternative having moderate or minor adverse impacts on water, wildlife, vegetation, or soil. Please exclude the Western Snowy Plover since I have found those references.</p> <p>As background, I have the link to the http://science.nature.nps.gov/im/units/sfan/inventories.cfm NPS Inventory Monitoring website but I see little to support the moderate or minor adverse wildlife, vegetation, or soil statements in the DEIS. I also can only find dogs referenced in regards to the Western Snowy Plover and not any regarding dogs having an adverse impact on the inventories of any other wildlife, vegetation, water, or soils.</p> <p>Examples that are listed in the DEIS references include but I do not have access to this GGNRA data:</p> <ul style="list-style-type: none"> Dylbala 2002, Golden Gate National Recreation Area Winter 2001-2002 Waterbird Survey Results, Prepared for GGNRA: Newby 2000, San Bruno Elfyn Butterfly Survey, Milagra Ridge, Golden Gate National Recreation Area, Site Stewardship Program, GGNP Association Fong/Campo 2006, Calendar Years 2003-2005 California Red-Legged Frog Surveys, GGNRA

	<ul style="list-style-type: none"> o USGS 2004, Wildlife Response to Habitat Restoration in Fort Funston, GGNRA, Final Report prepared for the NPS, Nov 2004 o Semnoff-Irving/Howell 2005 Pilot Inventory of Mammals, Reptiles, and Amphibians, GGNRA 1990-1997, Open file Report 2005-1381, USGS o 2000 Inventory of Benthic Invertebrates in Sandy Intertidal and Beach Habitats, Ocean Beach, San Francisco: Final Report o USGS 2008, Level 1 Water Quality Inventory of Baseline Levels of Pesticides in Urban Creeks – GGNRA and the Presidio, Data Series 338 p12, prepared by Hladik and Orlando.
Withheld	<p>O: Any quantifiable analysis with specific measurements of the human and/or dog impacts vegetation or soil in the closed areas at Fort Funston, Crissy Field, Lands End, Ocean Beach, or Baker Beach.</p> <p>Other than the Children's Dune Play area, some minor social trails and along the fence edge, I see little evidence that the vegetation in the closed areas is more than negligibly impacted.</p>

Request Date: 1/26/2011 FOIA NPS-2011-00257

<p>Received 4/1/2011 (65 days) - Completed</p> <p>NPS refused to provide until I went through a Department of Interior Appeals process.</p> <p>Note this data does not support the Law Enforcement Counts in the DEIS. It also does not support the claims of the NPS about the unsustainability of dog recreation due to safety or wildlife disturbances, particularly in comparison to the other users.</p>	<p>Database records on violations and injuries in the GGNRA or the Presidio</p>
<p>Cancelled. The NPS represented that this information would be made available soon because other FOIA requests were already in process.</p> <p>On 3/18/2011, I was notified by another dog owner that the 2007 to 2008 PDFs were available on the GGNRA website.</p>	<p>All officer notes pertaining to the dog bite, injury, rescue, wildlife disturbance, and attack events for 2007, 2008, and 2010</p>

<p>The 2007 to 2008 PDFs of ranger tickets shows that dog bite/attack incidents are rare and mostly nuisance type incidents and wildlife disturbances are rare.</p>	
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URGENT FOIA APPEAL FOR NPS-2011-0363/NPS-2011-0362/NPS-2011-00361

From: **Arnita Bowman** (arnitabowman@hotmail.com)
 Sent: Mon 4/25/11 4:35 PM
 To: FOIA Appeal (foia.appeals@sol.doi.gov)
 Cc: Howard - GGNRA Levitt (howard_levitt@nps.gov); Kevin - NPS West FOIA Killeen (kevin_killeen@nps.gov)
 2 attachments
 Status FOIA Request for Arnita Bowman.2-28-11.docx (33.9 KB) , FOIA Timeline-Event Summary.docx (30.8 KB)

I am appealing the response I received from Howard Levitts, NPS, in regards to my following FOIA requests for the Golden Gate National Recreation Area (GGNRA) unit:

Request Date: 3/14/2011 FOIA: NPS-2011-0363 - Financial Information and General Management Plan (FOIA 4)

Request Date: 3/14/2011 FOIA: NPS-2011-0362 - Ranger Tickets & Public Health Information (FOIA 3)

Request Date: 2/28/2011 FOIA NPS-2011-00361 - Visitation, Survey Data, Evidence of DEIS impacts (FOIA 2)

I have prepared a schedule summarizing the status of the requests along with a timeline of events. I am concerned with the NPS' failure to expedite this request based on the GGNRA Draft Dog Mangement (DEIS) public comment timeline and the failure to notify me (as required in the regulation) of the decisions regarding of my expedition requests. I am also concerned with the NPS withholding the current draft of the GGNRA general management plan based on the claim of **"PREDECISIONAL DRAFT - NOT AVAILABLE FOR PUBLIC DISTRIBUTION"**. I can not find anywhere in the FOIA regulations that this is a legal justification for withholding the information from the public. The plan has direct implications on the need for the DEIS, and the NPS plans for the GGNRA park units currently being used for recreation.

In summary, the NPS is continuing to delay providing information regarding the adverse dog impacts claimed in the GGNRA draft dog management plan. The public comment closes at the end of May and failure to provide this information directly impacts the publics ability to provide substantive comments and does not provide for environmental justice. My impression is NPS is still not dealing equally with both side of the dog management concern and is fully supporting the natural resource conservancy contingency no matter the cost but delaying requests by the pro dog recreation contingency or requests that may not support the Preferred Alternative. I do not feel I am being treated fairly and am concerned about the NPS FOIA process. I am concerned that I will not have the information in time to provide the public with information for providing a fully informed response to the DEIS. I believe the delays by the NPS should be grounds for extending the DEIS public response period.

I recognize that my FOIA requests require some time to address but nothing in comparison to the anti-dog contingencies request for all PDFs for pet related incidents nor the scale of the DEIS. In addition, my analysis of data is being dog groups evaluating the merits of the 2200 page DEIS that impacts 22 different park units and hundreds of thousands of Bay Area residents. The NPS has extensive claims in

the DEIS and in the media regarding the plan that need to be supported by evidence.

I will also forward the other email correspondence related to this FOIA request.

I appreciate your assistance with resolving this matter. I can be reached at 650 873 4828.

Sincerely,

Arnita Bowman

2130 Crestmoor Dr

San Bruno, CA 94066

From: arnitabowman@hotmail.com
 To: skot_jonz@nps.gov
 Subject: RE: FOIA # 2011-00257
 Date: Fri, 11 Feb 2011 22:15:45 -0800

Hi Skot,

Yes, as we discussed, I am ok with waving the request for specific dog bite/attack records since you said the other FOIA request (FOIA Request #1) will be made available to the public and will be available soon with all "pet" and dog incidents. Please let me know when I can expect this information to be available. Also, please provide me with the USPP summary reports for the GGNRA that you mentioned.

As for the electronic data request, I'm confused. I didn't agree to narrow the scope of my other request for electronic data records query, except for excluding 2007. I am still requesting all records electronically for 2008, 2009, and 2010. The number of records is not an issue. I also looked at the Department of Interior FOIA Guidance at <http://ecfr.gpoaccess.gov/cfr/t/text/text-idx?c=ecfr&sid=680d313447224cb3fe72a5a2572dc5a1&rgn=div5&view=text&node=43:1.1.1.2&idno=43>.

The guidance says "Normally if a bureau is extracting information from an existing computer database, this would not constitute the creation of a new record."

I am not asking for reports to be compiled or printed nor for programs to be developed. I am simply asking for a data dump of the existing records into an electronic file. I am not asking for database tables to be joined. I did ask for any supporting tables for any coded data fields. The GGNRA must have a query that fundamentally does this in order to have identified that there are 15,000 records a year and to have identified all the "pet" incidents for gathering the records for the other FOIA. At a minimum, I need the date, location description, and incident description for all incidents/offenses. I would also like the ticket number (linking to the ranger ticket), park area, fines and the other fields I originally requested but these are nice to have but not the main request. Adding these other fields isn't required, if it is cost prohibitive, but I expect the cost would be minimal if they are part of the main record.

Even if standard query doesn't currently exist, I don't believe that this information could be extracted in a few hours either through your standard on-line reporting system or by a database programmer. Obviously, they did it to get the information for the [FOIA Request #1](#) that you are working on. I basically need that same query without the "pet" selection restriction. Adding the selection just makes the FOIA Request #1 query more difficult. I'm not asking for anything complicated.

A file with 15,000 records per year is small. I'd like to get it as a comma delimited file on a CD but I can come in with a USB drive if that can't be provided. As in my original request, I can use any file format that can easily be imported into Access or EXCEL. **I do not want printed reports.** If each year is separated, the files are probably small enough to email. If this request still seems unreasonable, please provide me with 1) list of data fields available for offense/incidents, 2) the name of the database used for your system, 3) the hours required to query the records from the system, 4) the name of the GGNRA incident/offense tracking system, 5) a list of reports and queries currently available for the system, 6) the estimated cost for extracting the three key fields (date, location, and incident) and the estimated hours, and 7) the cost to extract all the other fields requested, if they are available. I'd also like to know the fees charged to the requestor for FOIA Request #1. That request is certainly more cost prohibitive and labor intensive.

Per the Department of Interior FOIA guidance:

- b) Bureaus will waive fees (in whole or part) if disclosure of all or part of the information is in the public interest because its release—
 - (1) Is likely to contribute significantly to public understanding of the operations or activities of the Government; and
 - (2) Is not primarily in the commercial interest of the requester.

I am not a commercial entity nor am I requesting my own personal information. This information is being requested specifically to contribute to the public's understanding of the impact of dogs in the GGNRA and for their use in providing public comment. Therefore, I believe this information should be provided with no charge or for a reduced fee based on the Freedom of Information Act. I have already analyzed the data for 2001 to 2006, and it is published on the Ocean Beach Dog website for public evaluation. Please see <http://oceanbeachdog.home.mindspring.com/id80.html>. I'll also be including this analysis in my comments to the Draft Dog Management Plan. Please let me know the justification for denying my fee waiver request.

I am still requesting that the request be expedited due to the short time frame for providing responses to

the Draft Dog Management Plan. I need time to analyze the records and to provide to the community for their consideration. Not expediting this request would impede the community's ability to fully understand the impact of dogs on the human and environmental aspects of the park. Please let me know the justification if this request cannot be expedited.

I'm surprised that the GGNRA is deferring me to the Central Violations Bureau to get the records. I'll follow-up with them but don't understand why the GGNRA can't provide the information for their own violations. I doubt they have the complaints and other incidents seen no fees would be charged for those.

If you aren't able to provide me with the electronic incident/offense records, I'd like to know as soon as possible so that I can process an appeal.

Thank you for your assistance in this matter,
Amita Bowman

- > Subject: FOIA # 2011-00257
- > To: arnitabowman@hotmail.com
- > From: Skot_Jonz@nps.gov
- > Date: Fri, 11 Feb 2011 18:22:16 -0800
- >
- > Hello Arnita,
- >
- > I'm following up after our conversation on 2/1/2011 regarding narrowing the
- > scope of your request. Thanks for helping us to better understand your
- > request. Here's what I believe we agreed to:
- >
- > You agree to waive your request for an expedited response due to the
- > extremely large volume of records being sought.
- > You narrowed your scope, and request a query report. I agreed that I
- > would look into whether this is possible or not.
- > You request that the query report contain information relevant to ALL
- > violations and injuries within GGNRA, not just pet-related incidents.
- > You explained that your primary interest is the category of offense and
- > specific location within park site, and county, if available.
- > Due to records retention policies, you understand that 2007 records may
- > not be available and agree to receive records from 2008, 2009, and 2010.
- > You were informed that several thousand pet-related incident reports
- > (2007-2010) are currently being redacted in response to another similar
- > FOIA request and will be posted on the nps.gov/goga website for public
- > view in the coming days. You agree to wait for those to be posted.
- > You request a detailed narrative on all dog bite incidents, if
- > available, and acknowledge that those narratives will be available on
- > the posted incident reports mentioned above.
- > You request a fee waiver because you claim to be providing a public
- > service by analyzing data to "evaluate the significance of any known
- > dog-related incidents in the parks in comparison to other human

> activities and injuries in the park."
>
> Upon checking with US Park Police about the time and resources involved, I
> am advised that it would require significant time to generate a report
> containing all the information you seek, including bringing on staff at
> overtime rates. Additionally, the size of the report generated would be
> unmanageable to print out, in light of the fact that in 2010 alone there
> were nearly 15,000 incidents. The time frame you are requesting, would
> amount to more than 50,000 entries taking more than 2,000 pages to print.
> The costs for staff time and printing would be well over the \$30 maximum
> you have stated. In this regard, your request for a fee waiver cannot be
> granted at this time.
>
> If you received a query report from Central Violations Bureau in 2006, as
> you say, you may want to attempt that again. The USPP office here does not
> have the same database capability.
>
> I am informed that the database used by USPP cannot provide the report
> electronically. US Park Police suggests you consider the annual summary
> reports for requested years which summarize the types of incidents within
> GGNRA, including breakdown by area and county of all incidents, but may not
> provide the specificity which you seek. These annual summary reports are
> available to you immediately at no cost.
>
> Please respond to me regarding narrowing the scope so that we may proceed
> with fulfilling your request. Also, please let me know if you are agreeable
> to receiving the annual summary reports instead of the query report and I
> will send them to you.
>
> Best regards,
>
> Skot Jonz
> Office of Public Affairs
> Golden Gate National Recreation Area
> 201 Fort Mason
> San Francisco, CA 94123
> 415.561.4734
> Skot_Jonz@nps.gov
>

Appendix 2



United States Department of the Interior

OFFICE OF THE SOLICITOR
Washington, D.C. 20240



IN REPLY REFER TO:
FOIA Appeal No. 2011-074

March 30, 2011

Arnita Bowman
2130 Crestmoor Dr.
San Bruno, CA 94066

Dear Ms. Bowman:

This responds to the February 25, 2011, Freedom of Information Act ("FOIA") appeal ("appeal") that you filed with the Department of the Interior ("Department"), which was received on February 28, 2011.¹ The Department has assigned your appeal as Appeal Number 2011-074. Please cite this number in any future correspondence you send to the Department regarding this appeal.

Your appeal challenges the National Park Service's ("NPS") determination that it cannot provide you with electronic records, as you requested, that are responsive to your January 26, 2011, FOIA request, which you subsequently modified² to seek a "data dump of the existing records" contained in an NPS database that contains information regarding "[a]ll alleged or actual violations and injuries in the [Golden Gate National Recreation Area ("GGNRA")] and Presidio [of San Francisco, GGNRA, NPS]."

In its February 23, 2011, letter responding to the FOIA request, the NPS advised you that the United States Park Police, who maintains the database, does not currently have the capability to transfer the data to you electronically and that it would need to "manually pull[]...45,000+ paper records" to "obtain the information you seek." Additionally, to assist you in understanding the capabilities of its system, the NPS advised you that it was a Microsoft Access database "with data entry only and very limited search parameters." To challenge the NPS's determination, in the appeal you assert that in Microsoft Access databases "the data can be queried and exported into an electronic file easily...This does not require any programming or highly technical skills nor manual effort..."

The Department has learned through its discussions with the NPS regarding your appeal that its database suffered a malfunction several years ago when the version of Microsoft Access that it used was upgraded to a newer version. The NPS advised that due to this malfunction its

¹ See 43 C.F.R. § 2.29(e) (provision in the Department's FOIA regulations that notes "Appeals arriving or delivered after 5 p.m. E.T., Monday through Friday, will be deemed received on the next workday."). Your e-mailed appeal to the Department arrived in the FOIA Appeals Office's e-mail inbox on Friday, February 25, 2011, at 5:55 PM. Therefore, the appeal is deemed as received on the next workday.

² See Your February 11, 2011, e-mail message to Skot Jonz, GGNRA, NPS, and your appeal.

Arnita Bowman
FOIA Appeal No. 2011-074
Page 2 of 3

personnel who work with the database were unable to export data to other programs and they did not have the technical expertise required to repair the problem. These facts lead the Department to conclude that the NPS appropriately advised you that it was unable to provide the requested "data dump" of information from its database to you electronically. Thus, your appeal challenging the appropriateness of the NPS's response to you on this issue is **DENIED**.

Notwithstanding the above conclusion, subsequent to the filing of the appeal, the NPS advised that its personnel continued to work on its database to try to develop a solution that would enable it to extract the information you requested from its database so that it could provide the materials to you electronically.³ The NPS has now advised the Department that its staff was able to develop such a solution.⁴ Since the NPS is now able to extract data from its database and provide it to you electronically, by copy of this letter, the Department is remanding the appeal to the NPS for it to proceed with the processing of the FOIA request. The NPS is directed to complete its processing of this remand within 15 workdays from the date of this decision. The NPS will correspond directly with you, with a copy of its letter to this Office.

Please be aware that due to the voluminous nature of the records you requested and the need for the NPS to review each record prior to release to ensure that they do not contain any information that is protected from disclosure by one of the FOIA's nine exemptions,^{5, 6} it may be necessary for the NPS to stagger its release of the materials to you as they become available. Employing such a practice of staggering the release of voluminous responsive documents fully comports with the requirement in the FOIA for agencies to "make [] records promptly available" to a requester.⁷ Should the NPS determine that it is necessary for it to stagger the release of the records, the NPS will advise you of this fact in the correspondence that it sends to you regarding the remand. Any such correspondence from the NPS will also include the anticipated schedule it plans to follow in releasing the materials to you.

³ The fact that the NPS was later able to develop a workaround solution to extract data from the database does not alter the fact that at the time the NPS responded to you, it was unable to provide you with the information you requested electronically.

⁴ The fact that the NPS continued to explore a means in which it could provide you with the information you seek from the database even after it completed its response to your FOIA request satisfies the Department that your assertion in the appeal that the NPS was "obstructing [your] ability to analyze and provide the information to the public in a timely manner" is without merit.

⁵ See 5 U.S.C. § 552(b)(1)-(9).

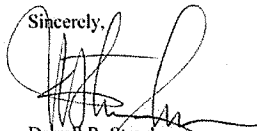
⁶ One of the fields of data that you seek from the database is the "location description" where the incident or offense occurred. The NPS has advised that this data field could include an individual's home address. Such information, if it exists, could be protected from disclosure by one or more FOIA exemptions, such as FOIA exemptions (6) (which protects certain information that "would cause a clearly unwarranted invasion of personal privacy") and (7)(C) (which protects certain information in law enforcement files that "could reasonably be expected to constitute an unwarranted invasion of personal privacy"). 5 U.S.C. § 552(b)(6) and (7)(C).

⁷ 5 U.S.C. § 552(a)(3)(A).

As a final matter, you express your concern in the appeal that you will not have the requested information "in time to provide the public with information for providing a fully informed response" to a Draft Plan/Draft Environmental Impact Statement for Dog Management ("DEIS") at GGNRA. You state that you believe "the delays by the NPS should be grounds for extending the DEIS public response period." Your concern here falls outside of the scope of the provisions of the FOIA and, thus, outside of the authority that this Office has to assist you. As such, there is no action for the Department to take on this issue.

This completes the Department's response to your appeal. If you have any questions regarding this matter, you may call me at (202) 208-5339.

Sincerely,



Darrell R. Strayhorn
FOIA Appeals Officer
Department of the Interior

cc: Charis Wilson, FOIA Officer, NPS (**FOR ACTION**)
Kevin Killeen, Pacific West Regional FOIA Officer, NPS
Howard Levitt, GGNRA FOIA Officer, NPS
Alexandra Mallus, Departmental FOIA Officer

FOIA APPEAL FOR NPS-2011-00257

From: **Arnita Bowman** (arnitabowman@hotmail.com)
 Sent: Fri 2/25/11 2:54 PM
 To: foia.appeals@sol.doi.gov
 2 attachments
 2006 Incidents-Offenses.accdb (1732.0 KB) , FOIA RESPONSE FOR NPS-2011-00257.pdf (1091.4 KB)

I am appealing the response I received from Howard Levitts, NPS, in regards to my request for the electronic records for GGNRA incidents/offenses for 2008 to 2010.

In summary, Howard states in the response (attached scan) that they are unable to provide the electronic records requested in my FOIA. However, in response to my questions, he says that they manually enter the data, the data fields available are **case number, time, date, incident/offense, description of location, and officer name**; and that the data is in an **Access database**. I personally use Access databases and know that the data can be queried and exported into an electronic file easily. For the individual that maintains the database, this should take no more than a half hour. This does not require any programming or highly technical skills nor manual effort; particularly with Access. In addition, they must have used a similar query to identify the pet incidents for the DEIS and the other FOIA described below.

In addition, the GGNRA provided this information for 2001 to 2006 to individuals that were involved in the Dog Management Negotiated Rule Making Process. I have attached a database file with the 2006 data for your reference. The file includes date, incident-offense, and location. I would also like to have the case number and officer name since those are also in the database.

As stated in the email below: I am simply asking for a data dump of the existing records into an electronic file. I am not asking for database tables to be joined. I did ask for any supporting tables for any coded data fields. The GGNRA must have a query that fundamentally does this in order to have identified that there are 15,000 records a year and to have identified all the "pet" incidents for gathering the records for the other FOIA. **At a minimum, I need the date, location description, and incident description for all incidents/offenses. I would also like the ticket number (linking to the ranger ticket), park area, fines and the other fields I originally requested but these are nice to have but not the main request. Adding these other fields isn't required, if it is cost prohibitive, but I expect the cost would be minimal if they are part of the main record.**

I am concerned that the NPS is not being forthcoming with the information requested and are obstructing my ability to analyze and provide the information to the public in a timely manner. I am concerned that the GGNRA Draft Dog Management Plan - EIS significantly misrepresents the dog offenses in the GGNRA. Health and Safety is a objective of the DEIS that needs to be fairly represented. The data from 2001 to 2006 clearly shows that dogs incidents are not significant in comparison to overall GGNRA offense/incidents particularly considering the high number of dog visitors.

I also had a conversation with Skot soon after I submitted my initial FOIA request and clarified that I was looking for the same information as in 2001 to 2006 except hopefully to get a few addition data fields

He explained that there was another FOIA request for compiling approximately 2,400 officer tickets for all pet incidents from 2001 to 2006. These 2400 tickets all had to be manually reviewed and personal information removed. My impression is NPS is not dealing equally with both side of the dog management concern and is fully supporting the natural resource conservancy contingency no matter the cost but delaying requests by the pro-dog contingency or requests that may not support the Preferred Alternative. I do not feel I am being treated fairly and am concerned about the NPS FOIA process. I made this request soon after the DEIS was made public. However, I am concerned that I will not have the information in time to provide the public with information for providing a fully informed response to the DEIS. I believe the delays by the NPS should be grounds for extending the DEIS public response period.

I will also forward the other email correspondence related to this FOIA request.

I appreciate your assistance with resolving this matter. I can be reached at 650 873 4828.

Sincerely,

Arnita Bowman

From: arnitabowman@hotmail.com
 To: skot_jonz@nps.gov
 Subject: RE: FOIA # 2011-00257
 Date: Fri, 11 Feb 2011 22:15:45 -0800

Hi Skot,

Yes, as we discussed, I am ok with waving the request for specific dog bite/attack records since you said the other FOIA request (FOIA Request #1) will be made available to the public and will be available soon with all "pet" and dog incidents. Please let me know when I can expect this information to be available. Also, please provide me with the USPP summary reports for the GGNRA that you mentioned.

As for the electronic data request, I'm confused. I didn't agree to narrow the scope of my other request

for electronic data records query, except for excluding 2007. I am still requesting all records electronically for 2008, 2009, and 2010. The number of records is not an issue. I also looked at the Department of Interior FOIA Guidance at <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=680d313447224cb3fe72a5a2572dc5a1&rgn=div5&view=text&node=43:1.1.1.1.2&idno=43>. The guidance says "Normally if a bureau is extracting information from an existing computer database, this would not constitute the creation of a new record."

I am not asking for reports to be compiled or printed nor for programs to be developed. I am simply asking for a data dump of the existing records into an electronic file. I am not asking for database tables to be joined. I did ask for any supporting tables for any coded data fields. The GGNRA must have a query that fundamentally does this in order to have identified that there are 15,000 records a year and to have identified all the "pet" incidents for gathering the records for the other FOIA. At a minimum, I need the date, location description, and incident description for all incidents/offenses. I would also like the ticket number (linking to the ranger ticket), park area, fines and the other fields I originally requested but these are nice to have but not the main request. Adding these other fields isn't required, if it is cost prohibitive, but I expect the cost would be minimal if they are part of the main record.

Even if standard query doesn't currently exist, I don't believe that this information could be extracted in a few hours either through your standard on-line reporting system or by a database programmer. Obviously, they did it to get the information for the FOIA Request #1 that you are working on. I basically need that same query without the "pet" selection restriction. Adding the selection just makes the FOIA Request #1 query more difficult. I'm not asking for anything complicated.

A file with 15,000 records per year is small. I'd like to get it as a comma delimited file on a CD but I can come in with a USB drive if that can't be provided. As in my original request, I can use any file format that can easily be imported into Access or EXCEL. **I do not want printed reports.** If each year is separated, the files are probably small enough to email. If this request still seems unreasonable, please provide me with 1) list of data fields available for offense/incidents, 2) the name of the database used for your system, 3) the hours required to query the records from the system, 4) the name of the GGNRA incident/offense tracking system, 5) a list of reports and queries currently available for the system, 6) the estimated cost for extracting the three key fields (date, location, and incident) and the estimated hours, and 7) the cost to extract all the other fields requested, if they are available. I'd also like to know the fees charged to the requestor for FOIA Request #1. That request is certainly more cost prohibitive and labor intensive.

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- b) Bureaus will waive fees (in whole or part) if disclosure of all or part of the information is in the public interest because its release—
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analysis in my comments to the Draft Dog Management Plan. Please let me know the justification for denying my fee waiver request.

I am still requesting that the request be expedited due to the short time frame for providing responses to the Draft Dog Management Plan. I need time to analyze the records and to provide to the community for their consideration. Not expediting this request would impede the community's ability to fully understand the impact of dogs on the human and environmental aspects of the park. Please let me know the justification if this request cannot be expedited.

I'm surprised that the GGNRA is deferring me to the Central Violations Bureau to get the records. I'll follow-up with them but don't understand why the GGNRA can't provide the information for their own violations. I doubt they have the complaints and other incidents seen no fees would be charged for those.

If you aren't able to provide me with the electronic incident/offense records, I'd like to know as soon as possible so that I can process an appeal.

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Arnita Bowman

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- > To: arnitabowman@hotmail.com
- > From: Skot_Jonz@nps.gov
- > Date: Fri, 11 Feb 2011 18:22:16 -0800
- >
- > Hello Arnita,
- >
- > I'm following up after our conversation on 2/1/2011 regarding narrowing the
- > scope of your request. Thanks for helping us to better understand your
- > request. Here's what I believe we agreed to:
- >
- > You agree to waive your request for an expedited response due to the
- > extremely large volume of records being sought.
- > You narrowed your scope, and request a query report. I agreed that I
- > would look into whether this is possible or not.
- > You request that the query report contain information relevant to ALL
- > violations and injuries within GGNRA, not just pet-related incidents.
- > You explained that your primary interest is the category of offense and
- > specific location within park site, and county, if available.
- > Due to records retention policies, you understand that 2007 records may
- > not be available and agree to receive records from 2008, 2009, and 2010.
- > You were informed that several thousand pet-related incident reports
- > (2007-2010) are currently being redacted in response to another similar
- > FOIA request and will be posted on the nps.gov/goga website for public
- > view in the coming days. You agree to wait for those to be posted.
- > You request a detailed narrative on all dog bite incidents, if
- > available, and acknowledge that those narratives will be available on

> the posted incident reports mentioned above.
> You request a fee waiver because you claim to be providing a public
> service by analyzing data to "evaluate the significance of any known
> dog-related incidents in the parks in comparison to other human
> activities and injuries in the park."
>
> Upon checking with US Park Police about the time and resources involved, I
> am advised that it would require significant time to generate a report
> containing all the information you seek, including bringing on staff at
> overtime rates. Additionally, the size of the report generated would be
> unmanageable to print out, in light of the fact that in 2010 alone there
> were nearly 15,000 incidents. The time frame you are requesting, would
> amount to more than 50,000 entries taking more than 2,000 pages to print.
> The costs for staff time and printing would be well over the \$30 maximum
> you have stated. In this regard, your request for a fee waiver cannot be
> granted at this time.
>
> If you received a query report from Central Violations Bureau in 2006, as
> you say, you may want to attempt that again. The USPP office here does not
> have the same database capability.
>
> I am informed that the database used by USPP cannot provide the report
> electronically. US Park Police suggests you consider the annual summary
> reports for requested years which summarize the types of incidents within
> GGNRA, including breakdown by area and county of all incidents, but may not
> provide the specificity which you seek. These annual summary reports are
> available to you immediately at no cost.
>
> Please respond to me regarding narrowing the scope so that we may proceed
> with fulfilling your request. Also, please let me know if you are agreeable
> to receiving the annual summary reports instead of the query report and I
> will send them to you.
>
> Best regards,
>
> Skot Jonz
> Office of Public Affairs
> Golden Gate National Recreation Area
> 201 Fort Mason
> San Francisco, CA 94123
> 415.561.4734
> Skot_Jonz@nps.gov
>

Re FOIA NPS-2022-00257 and Appeal No. 2011-074

From: **Howard_Levitt@nps.gov**

Sent: Fri 4/01/11 6:06 PM

To: **arnitabowman@hotmail.com**

Cc: **Skot_Jonz@nps.gov; Kevin_Killeen@nps.gov**

1 attachment

ALL LE & USPP INCIDENTS GGNRA 2007-2010.xlsx (3.5 MB)

Ms Bowman:

Attached is an Excel file listing all law enforcement incidents in the park from 2007-2010. Residential street addresses or other addresses that may compromise personal privacy have been redacted.

The information is being provided in its entirety, with the following fields:

Case Number

Date

Time of Day

Day of Week

Incident/Offense

Description of Location

Officer Name

And Code 1 - Y or N

A "No" indicates that the case was unfounded or no report was filed.

We believe that this completes our response to FOIA 2011-00257 and Appeal No. 2011-074.

Sincerely,

Howard Levitt

FOIA Officer

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

Re: Schedule of Case IDs for 2007-2008 dog DEIS counts

From: **Skot_Jonz@nps.gov**
Sent: Fri 5/13/11 12:53 PM
To: Arnita Bowman (arnitabowman@hotmail.com)
Cc: Howard_Levitt@nps.gov; Shirwin_Smith@nps.gov

Hello Arnita,
In response to your inquiry:

No summary or schedule of documents was used. To arrive at the totals in the DEIS, violations were hand-tabulated by reading through all incident reports one by one to determine the type and number of violations within each report. For example, a single incident report may contain more than one type of violation which could result in a single or multiple citations or warnings. Additionally, a ranger could issue warnings or citations to a number of individuals but record all of them on a single incident report. Thus, the total number of incident reports does not fully represent all violations.

Skot Jonz
Office of Public Affairs
Golden Gate National Recreation Area
201 Fort Mason
San Francisco, CA 94123
415.561.4734
Skot_Jonz@nps.gov

Arnita Bowman
<arnitabowman@hotmail.com> To
skot_jonz <skot_jonz@nps.gov>
05/10/2011 08:10 cc
AM
Subject
Schedule of Case IDs for 2007-2008
dog DEIS counts

Appendix 3

Hi Skotz,

Please let me know the status on providing the following that I requested in the FOIA on 4/23. As I said, I'm fine with the NPS not showing this as a FOIA if I receive the information quickly. However it has been two weeks. Hopefully, I can get the data in the next couple of days and don't have to escalate to a DOI appeal. That just makes thing more difficult for everyone.

Outstanding items from 4/23/11 FOIA request:

Any summary or schedule of documents that defines the specific Case IDs or other documentation that support the law enforcement counts for wildlife disturbances, dog bite/attacks, hazardous conditions/search & rescue, and complaints in the DEIS.
Any detailed supporting documents listed in the summary above that have not already been provided in the PDFs of law enforcement data for 2007-2008.

Arnita

From: arnitabowman@hotmail.com
To: skot_jonz@nps.gov
Subject: RE: AMENDMENT: Freedom of Information Act Request: Animal & Wildlife, Class 2 and Animal Protection
Date: Sat, 7 May 2011 06:56:26 -0700

Thanks!

I think you misunderstood my request for a schedule. I am asking for the specific case ids that support the law enforcement counts in the DEIS. For example, the schedule should have the specific case ids for the Stinson Beach bite incidents. I can't image the park service prepared the counts without some supporting document showing which caseids comprise the counts. As far as I can tell the 2007 and 2008 PDFs don't support the counts in the DEIS nor does the Access records of Law Enforcement Data. I'll admit I haven't read every word of every leash law so maybe I'm missing that.

If the incidents, such as the Stinson Beach bite incidents, aren't in the PDFs or Access records, I'm asking for the supporting documentation for those.

Thanks again.
Arnita

> Subject: RE: AMENDMENT: Freedom of Information Act Request: Animal & Wildlife, Class 2 and Animal Protection
> To: arnitabowman@hotmail.com
> From: Skot_Jonz@nps.gov
> Date: Fri, 6 May 2011 17:33:04 -0700

>
> Hello Arnita,
>
> Thank you for your patience while I contacted the appropriate staff for a
> response to your remaining questions below.
>
> > 3. Why are the counts in the DEIS so different from the information in
> the 2007-2008 PDFs? I wasn't able to tie the dog-related incident >
counts
> for 2007-2008 to the PDFs. For example, I did not see any
> Bite/Attacks for Stinson Beach, no where near 24 disturbing wildlife at
> Ocean Beach for 2007, no where near 32 hazardous condition/rescues at
Fort
> Funston, etc.
>
> RESPONSE:
> An incident can have as many as three (3) offense classifications. For
> example, if what starts as a dog incident ends up being a substance-abuse
> or felony arrest, it could be coded with one or both offenses, but end up
> being recorded with the most serious offense as the primary, i.e.
> Narcotics/Hazardous Condition/Pet. One incident report may be classified
> with a specific category, but involved other offenses not specifically
> coded. So, what I'm told is that not all incident reports may not be
> classified for all of the offenses or violations that took place within
the
> incident.. Also, I'm informed by the protection staff that although
> training is provided and supervisors are reminded to check reports prior
to
> approval for the correct and consistent classification type, nonetheless
a
> dog-bite incident can also be coded as Injured Person or Hazardous
> Condition. Dog/Pet/Leash incidents are not always pulled out if coded as
> an Injured Person, and they know this because if there was ever an issue,
> especially with a dog bite, LE staff flags the report. Also, I'm informed
> that sometimes a dog bite report may involve a dog vs. dog, or an
> accidental bite while breaking up a dog fight, but result in no or minor
> injuries could be classified as a leash law violation and not as a dog
> bite. My understanding is that narratives of incident reports were read
to
> capture the true number of incidents and arrive at the numbers you see in
> the DEIS, specifically Appendix G.
>
> >4. Any summary or schedule of documents that defines the specific Case
> IDs or other documentation that support the law enforcement counts > for
> wildlife disturbances, dog bite/attacks, hazardous conditions/search &
> rescue, and complaints in the DEIS.
>
> RESPONSE: There is a NPS Servicewide Classification of Incident Codes
which
> lists categories and breakout subcategories. A copy is being sent to me
> through interoffice mail, which I had hoped to have by today to scan and
> send to you. I will forward to you as soon as I get it.

>
> >5. Any detailed supporting documents listed in the summary (item 4)
above
> that have not already been provided in the PDFs of law enforcement data
for
> 2007-2008.
> RESPONSE: NONE.
>
>
> Skot Jonz
> Office of Public Affairs
> Golden Gate National Recreation Area
> 201 Fort Mason
> San Francisco, CA 94123
> 415.561.4734
> Skot_Jonz@nps.gov
>
>
>
> Skot
> Jonz/GOGA/NPS
> To
> 04/29/2011 03:43 Arnita Bowman
> PM <arnitabowman@hotmail.com>
> cc
>
> Subject
> RE: AMENDMENT: Freedom of
> Information Act Request: Animal &
> Wildlife, Class 2 and Animal
> Protection(Document link: Skot
> Jonz)
>
>
>
>
>
>
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>
>
> Hi Arnita,
>
> I'm pleased to know you are happy with the definitions. As for the
> remainder of this request, to address the discrepancies in the counts, I
> have several people at law enforcement working on getting an answer.
Thank
> you for giving me a couple more days to obtain this information for you.
>
> Have a great weekend,
> -Skot
>

```
> Skot Jonz  
> Office of Public Affairs  
> Golden Gate National Recreation Area  
> 201 Fort Mason  
> San Francisco, CA 94123  
> 415.561.4734  
> Skot_Jonz@nps.gov  
>  
>  
>  
> Arnita Bowman  
> <arnitabowman@hotmail.com>  
> To  
> skot_jonz <skot_jonz@nps.gov>  
> 04/28/2011 03:39 cc  
> PM Howard - GGNRA Levitt  
> <howard_levitt@nps.gov>,  
> <shirwin_smith@nps.gov>  
> Subject  
> RE: AMENDMENT: Freedom of  
> Information Act Request: Animal &  
> Wildlife, Class 2 and Animal  
> Protection  
>  
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>  
> Thank you so much!! Those definitions were a nagging question that I'm  
> relieved to have and could certainly impact the overall analysis. Funny  
> that I expected Class II would be a more significant incident. Amazing  
how  
> assumptions often prove untrue.  
>  
> I'm planning to start back looking at the law enforcement data probably  
on  
> Wednesday or Thursday of next week. So if you don't get it to me by this  
> Friday, I'm ok with getting it by Tuesday or Wednesday of next week.  
>  
> Thank you again for your assistance.  
> Arnita  
>  
> P.S. The San Mateo County parks and Rancho Corral are particularly  
> gorgeous right now with our grasses, flowers, mating birds, and baby  
> rabbits at their max. Now is a great time to make an excuse to get out of  
> SF, and check out the San Mateo parks units. Funny that this DEIS process  
> has made me more sensitive to the soundscapes and realize even more the
```

> richness of the birds in these parks.
>
>
> > Subject: AMENDMENT: Freedom of Information Act Request: Animal &
> Wildlife, Class 2 and Animal Protection
> > To: arnitabowman@hotmail.com
> > CC: Howard_Levitt@nps.gov; Shirwin_Smith@nps.gov
> > From: Skot_Jonz@nps.gov
> > Date: Thu, 28 Apr 2011 09:06:44 -0700
> >
> > Hello Arnita,
> >
> > Thank you for your willingness to work with us on this matter to avoid
an
> > unnecessary FOIA. Since I don't have these answers myself, I've been
> > contacting the appropriate departments to address these items you
listed
> by
> > Friday. To clarify the definitions of incident descriptions, here is
what
> I
> > received from US Park Police Records Office:
> >
> > Class 2- the incident did not occur or nothing was found, no written
> report
> > will be submitted.
> >
> > Wildlife Protection- is an incident that documents violation such as:
> > BOTHERING/MOLESTING
> > HUNTING/TRAPPING
> > POACHING/TAKING
> > SPOTLIGHTING
> > OTHER WILDLIFE PROTECTION VIOLATIONS SUCH AS FEEDING WILD ANIMALS
> >
> > Animals & Wildlife is a service incidents that documents
> > NATURAL RESOURCE MANAGEMENT of
> > Animals & Wildlife: such as
> > BEARS, DOMESTIC ANIMALS, FEDERALLY ENDANGERED ANIMALS, FEDERALLY
> > THREATENED ANIMALS, EXOTIC & OTHER ANIMAL & WILDLIFE INCIDENTS.
> > Plants:
> > Federally Endangered Plants, Federally Thretaened Plants, Rare
> > Plants, Exotic Plants,
> > Other Plants
> > Other Natural Resources/Features
> > ex: COYOTE SIGHTINGS, INJURED SEA LIONS, REMOVAL OF DEAD ANIMALS, LOST
> > PETS
> >
> >
> > I meet this afternoon with a staff member who may be able to answer
items
> > 3-5 of your request. I will provide a response to you as soon as I get
> it.

> > Thank you for your patience.
> > -Skot
> >
> > Skot Jonz
> > Office of Public Affairs
> > Golden Gate National Recreation Area
> > 201 Fort Mason
> > San Francisco, CA 94123
> > 415.561.4734
> > Skot_Jonz@nps.gov
> >
> >
> >
> > Arnita Bowman
> > <arnitabowman@hotmail.com>
> > To
> > skot_jonz <skot_jonz@nps.gov>
> > 04/26/2011 03:07 cc
> > PM
> > Subject
> > FW: AMENDMENT: Freedom of
> > Information Act Request: Animal &
> > Wildlife, Class 2 and Animal
> > Protection
> >
> >
> >
> >
> >
> >
> >
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> >
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> >
> > Hi Skot,
> >
> > Thank you for your call! I'd really appreciate getting an informal
email
> > with the information requested in my original email from 4/6. An email
> > would be best so that I could make sure I'm not misunderstanding and
can
> > reference the information. If you can send me the information by
Friday,
> > I'll definitely cancel the FOIA as this really shouldn't be something
> > that
> > requires a FOIA. In summary, I'm requesting:
> >
> > 1. Clarification of the following incident descriptions for the law
> > enforcement records: Wildlife Protection, Animal & Wildlife, and
> > Class 2.
> > 2. How is "Animal & Wildlife" different from "Wildlife Protection"?
> > I'm most interested in the probable cause of these incident (e.g.,

> > human wildlife disturbances, injured/rescued wildlife, etc.)). Do any
> > of these result in violations being issued?
> > 3. Why are the counts in the DEIS so different from the information in
> > the 2007-2008 PDFs? I wasn't able to tie the dog-related incident
> > counts for 2007-2008 to the PDFs. For example, I did not see any
> > Bite/Attacks for Stinson Beach, no where near 24 disturbing wildlife
> > at Ocean Beach for 2007, no where near 32 hazardous condition/rescues
> > at Fort Funston, etc.
> > 4. Any summary or schedule of documents that defines the specific Case
> > IDs or other documentation that support the law enforcement counts
> > for wildlife disturbances, dog bite/attacks, hazardous
> > conditions/search & rescue, and complaints in the DEIS.
> > 5. Any detailed supporting documents listed in the summary (item 4)
> > above that have not already been provided in the PDFs of law
> > enforcement data for 2007-2008.
> >
> > As I've said, I want to make sure I'm correctly characterizing the law
> > enforcement information that has been provided. Any other insight that
> > you
> > think is important would be appreciated.
> >
> > Thank you for your assistance. As you know, the NPS plans for the GGNRA
> > will significantly impact the daily lives and health of those of us
that
> > live in the Bay Area and for future generations.
> >
> > Arnita
> >
> > From: arnitabowman@hotmail.com
> > To: kevin_killeen@nps.gov; howard_levitt@nps.gov
> > CC: skot_jonz@nps.gov
> > Subject: AMENDMENT: Freedom of Information Act Request: Animal &
> Wildlife,
> > Class 2 and Animal Protection
> > Date: Sat, 23 Apr 2011 19:09:34 -0700
> >
> > Please amend the FOIA request below to also include the following
items:
> >
> > Any summary or schedule of documents that defines the specific Case
> > IDs or other documentation that support the law enforcement counts
> > for wildlife disturbances, dog bite/attacks, hazardous
> > conditions/search & rescue, and complaints in the DEIS.
> >
> > Any detailed supporting documents listed in the summary above that
> > have not already been provided in the PDFs of law enforcement data
> > for 2007-2008.
> >
> > As mentioned below, I am unable to support the Law Enforcement counts
in
> > the DEIS based on the details in the 2007-2008 PDFs provided. Since the
> > NPS, has not responded to my informal request I am placing this as a

FOIA

> > request.

> >

> > Regards,

> > Arnita Bowman

> >

> >

> >

> >

> > From: arnitabowman@hotmail.com

> > To: kevin_killeen@nps.gov; howard_levitt@nps.gov

> > CC: skot_jonz@nps.gov

> > Subject: Freedom of Information Act Request: Animal & Wildlife, Class 2

> and

> > Animal Protection

> > Date: Fri, 22 Apr 2011 17:34:45 -0700

> >

> > This is a Freedom of Information Act request for the ranger written case

> > notes (incident reports) for the sample of law enforcement cases listed in

> > the attached file. As mentioned in my informal request, I need

> > clarification on the generic meaning within the NPS for some of the

> > wildlife incident descriptions so that I don't misrepresent the

> > information

> > to the public. I do not want any personal information nor do I require any

> > addresses.

> >

> > I would appreciate your expediting this request due to the constraints

> > GGNRA dog management plan public comments which closes in May. My purpose

> > is to provide a community service by providing people with additional

> > information regarding the drafted dog management plan. I am providing

> > information through SFDog and Ocean Beach Dog groups as well in events

> > around the Bay Area and the media. Because this is a community service

> > and

> > reporting information to the public, I would appreciate a fee waiver and

> > need this request to be expedited. However, I am authorizing up to \$100 in

> > fees. I am deeply concerned that the NPS delays in providing information

> > is infringing on people's ability to provide substantive comments in the

> > DEIS process.

> >

> > I'd prefer to receive the documents on a CD or via email. If the cost is

> > too prohibitive, I can come to the GGNRA office to view the requests or can

> > access them on-line if a URL is provided. If the information is not

> readily
> > available, please provide me with that information.
> >
> > Please send me an email with your estimation of when I should expect to
> > receive the information and letting me know you received this email.
Also
> > do not hesitate to call me if you need clarification on my request.
> >
> > Thanks in advance for your assistance in this matter.
> >
> > Sincerely,
> > Arnita Bowman
> > 2130 Crestmoor Dr.
> > San Bruno, CA 94066
> > arnitabowman@hotmail.com
> > 650 873 4828
> >
> >
> > From: arnitabowman@hotmail.com
> > To: howard_levitt@nps.gov; kevin_killeen@nps.gov
> > Subject: Clarification requested: Animal & Wildlife, Class 2, and
Animal
> > Protection
> > Date: Wed, 6 Apr 2011 10:09:47 -0700
> >
> > Hi Howard,
> >
> > I've sorted through the 2007 to 2010 law enforcement incident records
> > that
> > you provided. I'd like to get clarification on the generic meaning
within
> > the NPS for some of the wildlife descriptions so that I don't
> > misrepresent
> > the information to the public. I probably should submit another FOIA
for
> > a
> > sample of the incidents so that I can verify the meaning but it would
be
> > easier if you can just briefly explain so we can both avoid that
effort.
> > I
> > need clarification of the following incident descriptions for the law
> > enforcement records:
> >
> > Wildlife Protection
> > Animal & Wildlife
> > Class 2
> >
> >
> > Attached is the extracted records and the sample that I plan to request
> > if
> > it is unclear as to the meaning of these descriptions. I'm most

> interested
> > in the probably cause of the incident (e.g., human wildlife disturbances,
> > injured/rescued wildlife, etc.). How is "Animal & Wildlife" different
> from
> > "Wildlife Protection"? Your insight would be helpful.
> >
> > Also, please briefly explain why the counts in the DEIS are so different
> > from the information in the PDFs? I wasn't able to tie the dog-related
> > incident counts for 2007-2008 to the PDFs. For example, I did not see any
> > Bite/Attacks for Stinson Beach, no where near 24 disturbing wildlife at
> > Ocean Beach for 2007, no where near 32 hazardous condition/rescues at
> Fort
> > Funston, etc. If I'm just missing it in the PDFs, do you have a summary
> > document that shows the Case IDs that support the counts in the DEIS?
> >
> > Also, I only see the PDFs for 2007-2008 on the GGNRA website. I thought
> > that the PDFs were being provided for 2009 and 2010 as well. If that is
> > the case, please provide me with the PDFs.
> >
> > Thank you for your assistance in helping the me understanding the data
> > supporting the DEIS. I'll hold off on submitting the FOIA until Friday
> so
> > hopefully I'll hear from you before then.
> >
> > Regards,
> > Arnita Bowman

RE: AMENDMENT: Freedom of Information Act Request: Animal & Wildlife, Class 2 and Animal Protection

From: **Skot_Jonz@nps.gov**
Sent: Fri 5/06/11 5:32 PM
To: Arnita Bowman (arnitabowman@hotmail.com)

Hello Arnita,

Thank you for your patience while I contacted the appropriate staff for a response to your remaining questions below.

> 3. Why are the counts in the DEIS so different from the information in the 2007-2008 PDFs? I wasn't able to tie the dog-related incident > counts for 2007-2008 to the PDFs. For example, I did not see any Bite/Attacks for Stinson Beach, no where near 24 disturbing wildlife at Ocean Beach for 2007, no where near 32 hazardous condition/rescues at Fort Funston, etc.

RESPONSE:

An incident can have as many as three (3) offense classifications. For example, if what starts as a dog incident ends up being a substance-abuse or felony arrest, it could be coded with one or both offenses, but end up being recorded with the most serious offense as the primary, i.e. Narcotics/Hazardous Condition/Pet. One incident report may be classified with a specific category, but involved other offenses not specifically coded. So, what I'm told is that not all incident reports may not be classified for all of the offenses or violations that took place within the incident.. Also, I'm informed by the protection staff that although training is provided and supervisors are reminded to check reports prior to approval for the correct and consistent classification type, nonetheless a dog-bite incident can also be coded as Injured Person or Hazardous Condition. Dog/Pet/Leash incidents are not always pulled out if coded as an Injured Person, and they know this because if there was ever an issue, especially with a dog bite, LE staff flags the report. Also, I'm informed that sometimes a dog bite report may involve a dog vs. dog, or an accidental bite while breaking up a dog fight, but result in no or minor injuries could be classified as a leash law violation and not as a dog bite. My understanding is that narratives of incident reports were read to capture the true number of incidents and arrive at the numbers you see in the DEIS, specifically Appendix G.

>4. Any summary or schedule of documents that defines the specific Case IDs or other documentation that support the law enforcement counts > for wildlife disturbances, dog bite/attacks, hazardous conditions/search & rescue, and complaints in the DEIS.

RESPONSE: There is a NPS Servicewide Classification of Incident Codes which lists categories and breakout subcategories. A copy is being sent to me through interoffice mail, which I had hoped to have by today to scan and send to you. I will forward to you as soon as I get it.

>5. Any detailed supporting documents listed in the summary (item 4) above that have not already been provided in the PDFs of law enforcement data for 2007-2008.

RESPONSE: NONE.

Skot Jonz
Office of Public Affairs
Golden Gate National Recreation Area
201 Fort Mason
San Francisco, CA 94123
415.561.4734
Skot_Jonz@nps.gov

Skot
Jonz/GOGA/NPS
To
04/29/2011 03:43 Arnita Bowman
PM <arnitabowman@hotmail.com>
cc

Subject
RE: AMENDMENT: Freedom of
Information Act Request: Animal &
Wildlife, Class 2 and Animal
Protection(Document link: Skot
Jonz)

Hi Arnita,

I'm pleased to know you are happy with the definitions. As for the remainder of this request, to address the discrepancies in the counts, I have several people at law enforcement working on getting an answer. Thank you for giving me a couple more days to obtain this information for you.

Have a great weekend,
-Skot

Skot Jonz
Office of Public Affairs
Golden Gate National Recreation Area

201 Fort Mason
San Francisco, CA 94123
415.561.4734
Skot_Jonz@nps.gov

Arnita Bowman
<arnitabowman@hotmail.com> To
skot_jonz <skot_jonz@nps.gov>
04/28/2011 03:39 cc
PM Howard - GGNRA Levitt
<howard_levitt@nps.gov>,
<shirwin_smith@nps.gov>
Subject
RE: AMENDMENT: Freedom of
Information Act Request: Animal &
Wildlife, Class 2 and Animal
Protection

Thank you so much!! Those definitions were a nagging question that I'm relieved to have and could certainly impact the overall analysis. Funny that I expected Class II would be a more significant incident. Amazing how assumptions often prove untrue.

I'm planning to start back looking at the law enforcement data probably on Wednesday or Thursday of next week. So if you don't get it to me by this Friday, I'm ok with getting it by Tuesday or Wednesday of next week.

Thank you again for your assistance.
Arnita

P.S. The San Mateo County parks and Rancho Corral are particularly gorgeous right now with our grasses, flowers, mating birds, and baby rabbits at their max. Now is a great time to make an excuse to get out of SF, and check out the San Mateo parks units. Funny that this DEIS process has made me more sensitive to the soundscapes and realize even more the richness of the birds in these parks.

> Subject: AMENDMENT: Freedom of Information Act Request: Animal &
Wildlife, Class 2 and Animal Protection

AMENDMENT: Freedom of Information Act Request: Animal & Wildlife, Class 2 and Animal Protection

From: **Skot_Jonz@nps.gov**
Sent: Thu 4/28/11 9:08 AM
To: Arnita Bowman (arnitabowman@hotmail.com)
Cc: Howard_Levitt@nps.gov; Shirwin_Smith@nps.gov

Hello Arnita,

Thank you for your willingness to work with us on this matter to avoid an unnecessary FOIA. Since I don't have these answers myself, I've been contacting the appropriate departments to address these items you listed by Friday. To clarify the definitions of incident descriptions, here is what I received from US Park Police Records Office:

Class 2- the incident did not occur or nothing was found, no written report will be submitted.

Wildlife Protection- is an incident that documents violation such as:

BOTHERING/MOLESTING

HUNTING/TRAPPING

POACHING/TAKING

SPOTLIGHTING

OTHER WILDLIFE PROTECTION VIOLATIONS SUCH AS FEEDING WILD ANIMALS

Animals & Wildlife is a service incidents that documents

NATURAL RESOURCE MANAGEMENT of

Animals & Wildlife: such as

BEARS, DOMESTIC ANIMALS, FEDERALLY ENDANGERED ANIMALS, FEDERALLY THREATENED ANIMALS, EXOTIC & OTHER ANIMAL & WILDLIFE INCIDENTS.

Plants:

Federally Endangered Plants, Federally Threataened Plants, Rare

Plants, Exotic Plants,

Other Plants

Other Natural Resources/Features

ex: COYOTE SIGHTINGS, INJURED SEA LIONS, REMOVAL OF DEAD ANIMALS, LOST PETS

I meet this afternoon with a staff member who may be able to answer items 3-5 of your request. I will provide a response to you as soon as I get it. Thank you for your patience.

-Skot

Skot Jonz
Office of Public Affairs
Golden Gate National Recreation Area
201 Fort Mason
San Francisco, CA 94123
415.561.4734



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Exploring Ethnic Minority Experiences and Perspectives about the GGNP

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[Dr. Nina Roberts' Study](#) explores ethnic minority experiences at the GGNP. It finds, surprisingly, that off-leash dogs are a significant impact on minority user groups experiences at the Golden Gate National Parks.

**Visitor/Non-Visitor Use Constraints:
Exploring Ethnic Minority Experiences
and Perspectives**

General Technical Report Submitted to:

**The Golden Gate National Recreation Area
and
The Golden Gate National Parks Conservancy**



Nina S. Roberts, Ph.D.
Assistant Professor and Principal Investigator



**SAN FRANCISCO
STATE UNIVERSITY**

March 2007



Comments

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Monitoring the Condition of Natural Resources in US National Parks

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Abstract The National Park Service has developed a long-term ecological monitoring program for 32 ecoregional networks containing more than 270 parks with significant natural resources. The monitoring program assists park managers in developing a broad-based understanding of the status and trends of park resources as a basis for making decisions and working with other agencies and the public for the long-term protection of park ecosystems. We found that the basic steps involved in planning and designing a long-term ecological monitoring program were the same for a range of ecological systems including coral reefs, deserts, arctic tundra, prairie grasslands, caves, and tropical rainforests. These steps involve (1) clearly defining goals and objectives, (2) compiling and summarizing existing information, (3) developing conceptual models, (4) prioritizing and selecting indicators, (5) developing an overall sampling design, (6) developing monitoring protocols, and (7) establishing data management, analysis, and reporting procedures. The broad-based, scientifically sound information obtained through this systems-based monitoring program will have multiple applications for management decision-making, research, education, and promoting public understanding of park resources. When combined with an effective education program, monitoring results can contribute not only to park issues, but also to larger quality-of-life issues that affect surrounding communities and can contribute significantly to the environmental health of the nation.

Keywords Ecological monitoring • Environmental monitoring • Monitoring design • Indicator • National park • Protected areas • Protocol • Sampling design • Vital signs

Introduction

Knowing the condition of natural resources in national parks, which protect many of the nation's most pristine and intact ecosystems, is fundamental to the National Park Service's (NPS) mission to manage park resources "unimpaired for the enjoyment of future generations." Park managers are confronted with increasingly complex and challenging issues that require a broad-based understanding of the status and trends of park resources as a basis for making decisions and working with other agencies and the public for the long-term protection of park ecosystems. Understanding the dynamic nature of park ecosystems and the consequences of human activities is essential for management decision-making aimed to maintain, enhance, or restore the ecological integrity of park ecosystems and to avoid, minimize, or mitigate ecological threats to these systems (Roman and Barrett 1999; Vaughan et al. 2001; Busch and Trexler 2003).

The overall purpose of natural resource monitoring in parks is to develop scientifically sound information on the current status and long term trends in the composition, structure, and function of park ecosystems, and to determine how well current management practices are sustaining those ecosystems. Use of monitoring information will increase confidence in manager's decisions and improve their ability to manage park resources, and will allow managers to confront and mitigate threats to the park and operate more effectively in legal and political arenas. National parks also play an important role as natural laboratories and locations for developing ecological baselines against which data from more disturbed areas can be compared. When combined with an effective education program, monitoring results can contribute not only to park issues, but also to larger quality-of-life issues that affect surrounding communities and can contribute significantly to the environmental health of the nation (Soukup 2007).

The National Park Service has initiated a long-term ecological monitoring program, known as "Vital Signs Monitoring", to provide the minimum infrastructure to allow more than 270 national park system units to identify and implement long-term monitoring of their highest-priority measurements of resource condition. The NPS has used the term "vital signs monitoring" since the early 1980s (Davis 1989, 2005) to refer to a relatively small set of information-rich attributes that are used to track the overall condition or "health" of park natural resources and to provide early warning of situations that require intervention. We define vital signs as a subset of physical, chemical, and biological elements and processes of park ecosystems that are selected to represent the overall health or condition of park resources, known or hypothesized effects of stressors, or elements that have important human values. The broad-based, scientifically sound information obtained through this systems-based monitoring program will have multiple applications for management decision-making, research, education, and promoting public understanding of park resources. In this paper, we describe the goals and implementation strategy for the vital signs monitoring program, and summarize

the planning and design steps that were successfully used to develop long-term ecological monitoring programs for more than 270 parks organized into 32 ecoregional networks.

Policy and Management Context

The 1916 National Park Service Organic Act is the core of park service authority and the definitive statement of the purposes of the parks and of the National Park Service mission. The act establishes the purpose of national parks: “.... 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.” NPS Management Policies (NPS 2006) state that “*The Service will also strive to ensure that park resources and values are passed on to future generations in a condition that is as good as, or better than, the conditions that exist today*”, and that “*Decision makers and planners will use the best available scientific and technical information and scholarly analysis to identify appropriate management actions for protection and use of park resources*”. In the National Parks Omnibus Management Act of 1998, Congress specifically directed the NPS to “undertake a program of inventory and monitoring of National Park System resources to establish baseline information and to provide information on the long-term trends in the condition of National Park System resources”.

Program Goals and Implementation Strategy

The common programmatic goals of Vital Signs Monitoring for the 32 networks are as follows:

1. Determine the status and trends in selected indicators of the condition of park ecosystems to allow managers to make better-informed decisions and to work more effectively with other agencies and individuals for the benefit of park resources.
2. Provide early warning of abnormal conditions of selected resources to help develop effective mitigation measures and reduce costs of management.
3. Provide data to better understand the dynamic nature and condition of park ecosystems and to provide reference points for comparisons with other, altered environments.
4. Provide data to meet certain legal and Congressional mandates related to natural resource protection and visitor enjoyment.
5. Provide a means of measuring progress towards performance goals.

Three factors were key in the development of the vision, goals, and implementation strategy of the NPS vital signs monitoring program: (1) An analysis of the targeted audiences and primary uses of the monitoring results; (2) Recognition of the need to leverage the limited resources available to the program through partnerships with parks, other NPS programs, and other agencies; and (3) Recognition that the “information rich” attributes that best characterized park ecosystems differed greatly across the wide range of ecological systems represented in the national park system.

The primary audience and users of the monitoring results are managers, planners, natural resource specialists, interpreters, and scientists at the local, park level (Figure 1). In partnership with other NPS programs and park interpreters, monitoring results are also provided to the general public, “because it is the broader public that will decide the fate of the resources” (National Park System Advisory Board 2001), and to Congress and the Office of Management and Budget for accountability and performance management purposes.

The level of funding provided for long-term monitoring would allow each park to monitor only a few vital signs, which in most cases was inadequate to track the condition of air, water, geological, and biological resources managed by the park. There was an obvious need to leverage the program's limited resources through partnerships with others, and to maximize the use and relevance of the data for key target audiences. Most of the larger parks were already monitoring a few high-priority resources using funding from other sources, and other NPS programs and other agencies had monitoring components that provided relevant data for tracking resource condition (Figure 1). Partnerships with other NPS programs and with federal and state agencies and adjacent landowners are critical to effectively understand and manage the many resources and threats that extend beyond park boundaries. Parks are part of larger ecological systems and must be managed in that context.

A top-down, “one size fits all” approach to monitoring design would not be effective or supported in the NPS because of the tremendous variability among parks in ecological context and in park sizes and management capabilities. The National Park System, by design, includes a huge diversity of ecological systems including coral reefs, deserts, arctic tundra, prairie grasslands, caves, and tropical rainforests. We evaluated and rejected the strategy of selecting a set of core indicators that every park would measure in a similar way because the “information rich” attributes that best characterized park ecosystems differed greatly among ecological systems, very few measures were common across parks, and because partnership opportunities (and the appropriate ecological indicators and sampling methodologies associated with them) available to parks differed throughout the national park system. We instead adopted a strategy that allowed each park, working with partners and subject-matter experts, to prioritize and select their vital signs based on their most critical data needs and local partnership opportunities, with coordination and sharing of protocols and data sets facilitated by the national office.

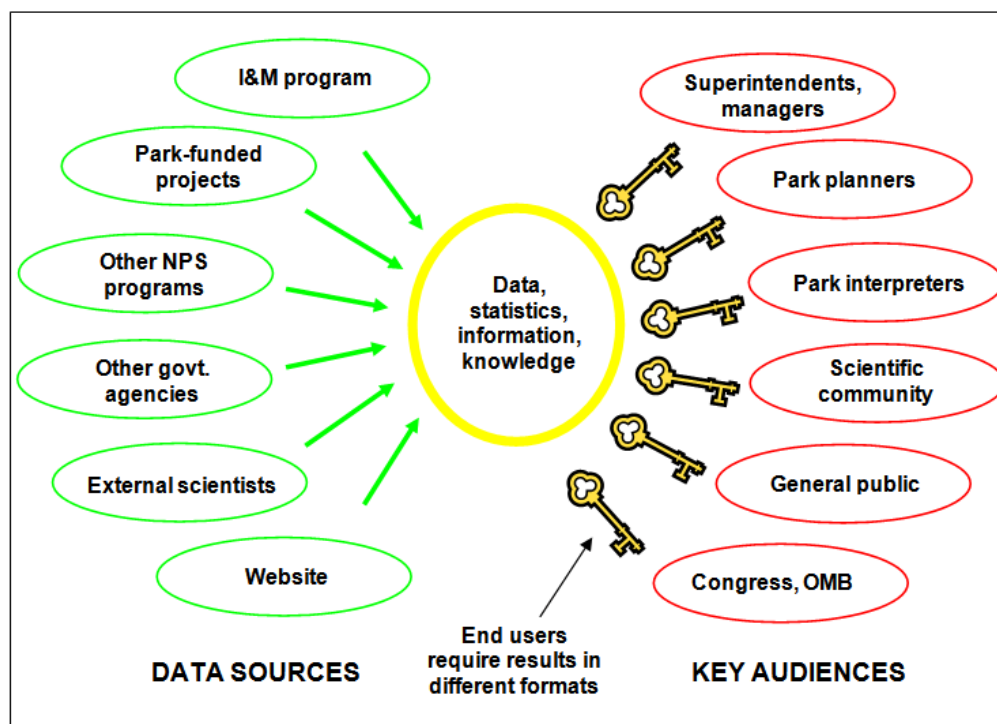


Figure 1. Scientific data for monitoring the condition of park natural resources are obtained from a number of sources, and are managed, analyzed, and distributed to key targeted audiences in various formats to maximize utility and availability of results. The I&M Program has made a large investment in information management to ensure that relevant monitoring data are managed, analyzed, and reported to key audiences.

To facilitate collaboration, information sharing, and economies of scale in inventory and monitoring (I & M), the NPS organized the more than 270 parks with significant natural resources into 32 I & M networks linked by geography and shared natural resource characteristics (Figure 2). We initially used Bailey's ecoregions (Bailey 1998) and estimates of the workload needed to manage the natural resources of each park to assign parks to each network. Parks in each network share core funding and a professional staff that are augmented by funding and staffing from park base accounts and other sources to plan, design, and implement an integrated long-term monitoring program.



Figure 2. More than 270 park units with significant natural resources have been organized into 32 ecoregional networks that share core funding and a professional staff to conduct long-term monitoring of park ecosystems.

Steps in Monitoring Design

The complex task of developing a network monitoring program requires a front-end investment in planning and design to ensure that monitoring will meet the most critical information needs of each park and produce scientifically credible data that are accessible to managers and researchers in a timely manner. The investment in planning and design also ensures that monitoring will build upon existing information and understanding of park ecosystems and make maximum use of leveraging and partnerships with other programs, agencies, and academia. We found that the following basic steps for designing a long-term ecological monitoring program worked effectively across all 32 networks. Detailed guidance, examples, monitoring plans, and sampling protocols are available on the internet (NPS 2007).

Clearly Define Goals and Objectives

One of the most critical steps in designing a complex interdisciplinary monitoring program is to clearly define the goals and objectives of the program and get agreement on them from key stakeholders. In our evaluation of “lessons learned” by other monitoring programs, we found that differences in opinion regarding the purpose of the monitoring as the program was being developed often led to significant problems later during the design and implementation phases. The 32 networks of parks all shared the same five goals of vital signs monitoring, as listed above in Section 3. The development of monitoring objectives, which provide additional focus about the purpose or desired outcome of the monitoring effort, was an iterative process that sometimes required several years to refine. Early in the design process, monitoring objectives were stated in more general terms, such as “Determine trends in the incidence of disease and infestation in selected plant communities and populations”, whereas the final monitoring plan and protocols provided monitoring objectives that met the test of being realistic, specific, and measurable (e.g., “Estimate trends in the proportion, severity, and survivorship of limber pine trees infected with white pine blister rust at Craters of the Moon National Monument”; Garrett et al. 2007).

Compile and Summarize Existing Information

Another important early step in the process of developing a monitoring strategy is the task of identifying, summarizing, and evaluating existing information and understanding of park ecosystems. The I&M networks discovered and summarized existing information through a series of literature reviews, scoping workshops, and interviews and surveys with park managers and subject-matter experts. The results from these “data mining” and scoping efforts were summarized in databases and reports that were used as the basis for conceptual modeling and subsequent monitoring design work; these databases and reports are expected to have multiple future applications by park managers, planners, educators, the scientific community, and others.

Develop Conceptual Models

The development of conceptual models, which are visual or narrative summaries that describe the important components of the ecosystem and the interactions among them, are a key step in understanding how the diverse components of a monitoring program interact and in promoting integration and communication among scientists and managers from different disciplines. We found that the learning that accompanied the design, construction, and revision of the models contributed to a shared understanding of system dynamics and an appreciation of the diversity of information needed to identify an appropriate suite of ecological measurements, and the process of developing conceptual models was often more important than the model itself.

Early in the planning and design process, I&M networks developed simple models that were highly aggregated representations of ecological systems, primarily as a framework for organizing, summarizing, and communicating the large amount of information obtained from literature reviews, scoping sessions, and interviews with park managers, staff, and subject-matter experts (e.g., Figure 3). Many networks based their highest-level model on a very general ecosystem (Chapin et al. 1996), modified to include broad-scale stressors more specific to the park or ecosystems of interest (e.g., Miller 2005). Once potential indicators were identified, models became more detailed and often more mechanistic, to clearly articulate relationships between measurements and the ecological attributes they represent. The proper interpretation of indicators will be greatly facilitated by scientifically sound and defensible linkages between the indicator and the ecological function or critical resource it is intended to represent (Kurtz et al. 2001). These key linkages should be explicit in conceptual models and their articulation is essential to justifying and interpreting ecological measurements.

Conceptual models can take the form of any combination of narratives, tables, matrices of factors, box-and-arrow diagrams, and conceptual diagrams using graphical symbols, and all of these forms were used in this program. All of the networks developed a set of conceptual models that consisted of diagrams with accompanying narratives that described the model, justified functional relationships in figures, and cited sources of information and data on which the models were based. Three fundamentally different model structures, with many modifications, used by the I&M networks and other agencies are control models, stressor models (e.g., Ogden et al. 2005), and state and transition models (Westoby 1989, Bestelmeyer 2003). Figure 4 illustrates the models used by one network to meet different needs as the network matured (NPS 2008).

All conceptual models should be viewed as representing our current understanding of a systems’ dynamics, and a model is just one articulation of a set of hypotheses. As data are acquired and our understanding is improved, conceptual models need to evolve to match increased knowledge (Cloern 2001).

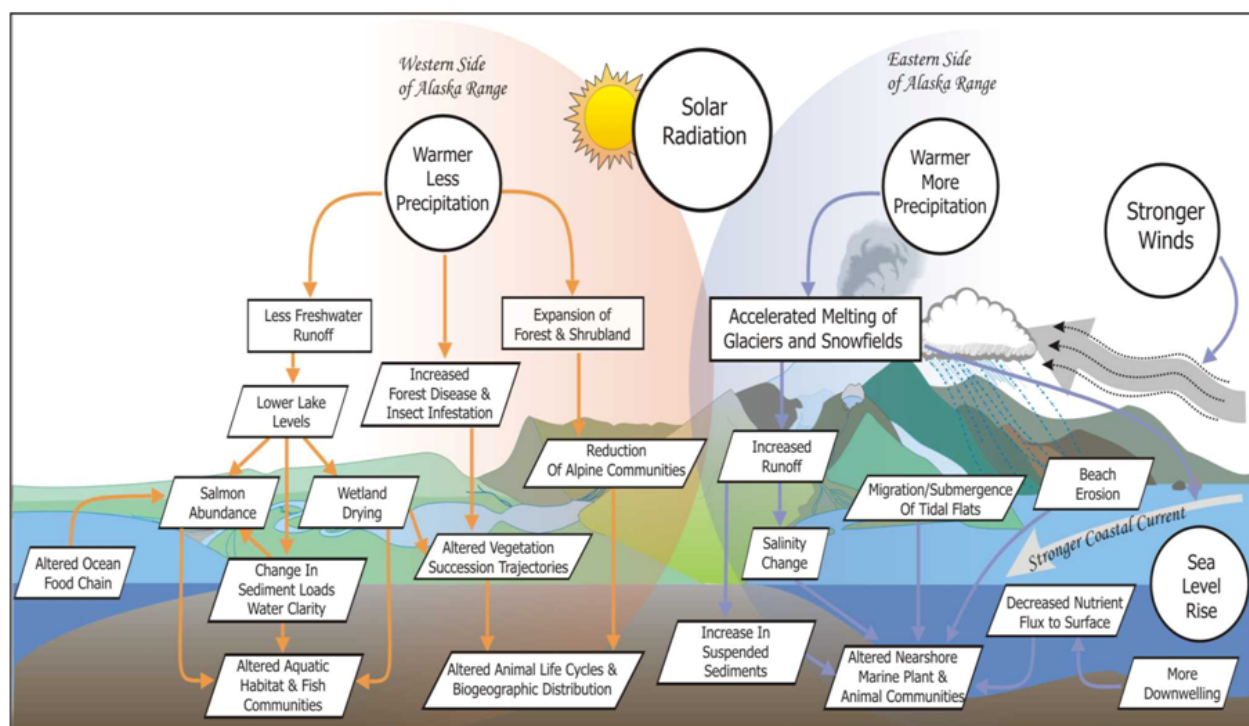


Figure 3. Example of a conceptual model summarizing expected changes from a warming climate on park ecosystems, habitats, plants, and animals in the Southwest Alaska network of parks. Warming is likely to alter the hydrologic cycle and influence processes that have created and maintained park ecosystems. Some anticipated changes include sea-level rise, greater storm intensity and frequency, altered patterns of seasonal runoff, rapid glacial retreat, and shorter duration of lake ice cover (Bennett et al. 2006).

Prioritize and Select Indicators

The task of selecting a relatively small set of long-term measurements for each national park that "represent the overall health or condition of park resources, known or hypothesized effects of stressors, or elements that have important human values" is very challenging, particularly when taking into account the need to maximize the use and relevance of the data and to leverage core funding and staffing through partnerships. Most park networks followed the basic approach summarized in Figure 5 to identify and prioritize potential vital signs (NPS 2007). The scoping process identified park issues, monitoring questions, and data needs that included (1) focal resources (including ecological processes) important to each park, (2) agents of change or stressors that are known or suspected to cause changes in the focal resources over time; and (3) key properties and processes of ecosystem health (e.g., weather, soil nutrients). Conceptual models were then developed to help organize and communicate the information compiled during scoping, and to identify where cause-effect was known between some of the stressors and response variables. The scoping and conceptual modeling efforts resulted in a long list of potential vital signs, which were then prioritized using a set of criteria and a scoring system agreed upon by the parks (Table 1). We found that the process of defining vital signs and the relationships among them was critical for building shared understanding and support for the indicators that were ultimately selected (Dennison et al. 2007). The final step in the process incorporated other criteria such as efficient use of personnel, cost and logistical feasibility, partnership opportunities with other programs, and a large dose of common sense to select the initial set of vital signs for the network's monitoring program. We obtained best results when prioritization and selection of vital signs were treated as two separate steps in the process.

We developed an Ecological Monitoring Framework (Table 2) as an organizational tool for promoting a systems-based monitoring program and for promoting communication, collaboration, and coordination with other networks, programs, and agencies involved in ecological monitoring. The framework is based on earlier work by Woodley (1993) for national parks in Canada, the European Habitat Classification System (EEA 2003), and work by Noss (1990), Grossman et al. (1998), Harwell et al. (1999), and EPA (2002). The framework has subsequently been modified and adopted by numerous agencies as part of the Natural Resource Monitoring Partnership (NRMP 2007).

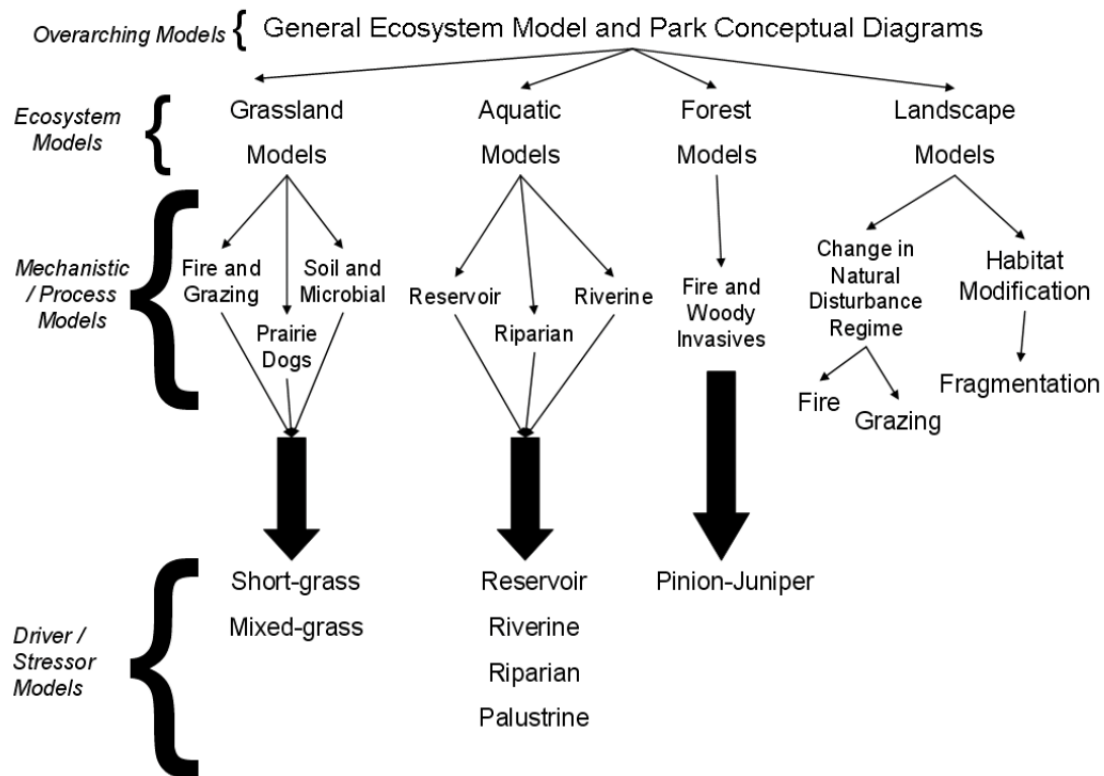


Figure 4. Conceptual models and model types used by the Southern Plains I&M Network (NPS 2008).

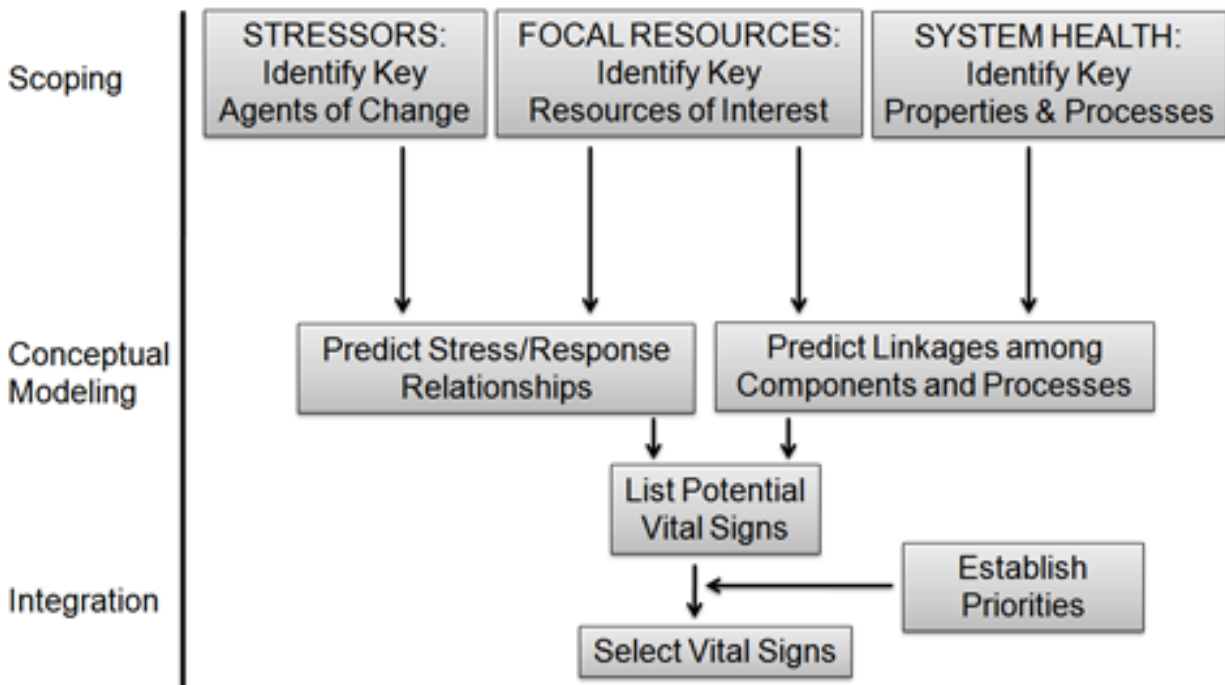


Figure 5. Basic approach to identifying and selecting vital signs for integrated monitoring of park resources (source: Kurt Jenkins, USGS Olympic Field Station).

Table 1. Criteria used to calculate priority ranks for the list of potential vital signs for monitoring resource condition.

Criterion 1: Management Significance (Weight - 40 %) - A useful ecological indicator must produce results that are clearly understood and accepted by park managers, other policy makers, research scientists, and the general public, all of whom are able to recognize the implications of the indicator's results for protecting and managing the park's natural resources. Ultimately, an indicator is useful only if it can provide information to support a management decision (including decisions by other agencies and organizations that benefit park resources) or to quantify the success of past decisions.

- There is an obvious, direct application of the data to a key management decision, or for evaluating the effectiveness of past management decisions.
- The measurements will produce results that are clearly understood and accepted by park managers, other policy makers, research scientists, and the general public, all of whom should be able to recognize the implications of the results for protecting and managing the park's natural resources.
- Monitoring results are likely to provide early warning of resource impairment, and will save park resources and money if a problem is discovered early.
- In cases where data will be used primarily to influence external decisions, the decisions will affect key resources in the park, and there is a great potential for the park to influence the external decisions.
- Data are of high interest to the public.
- For species-level monitoring, involves species that are harvested, endemic, alien, species of special interest, or are threatened or endangered.
- There is an obvious, direct application of the data to performance goals.
- Contributes to increased understanding that ultimately leads to better management.

Criterion 2: Ecological Significance (Weight - 40 %)

- There is a strong, defensible linkage between the indicator and the ecological function or critical resource it is intended to represent.
- The resource being represented by the indicator has high ecological importance based on the conceptual model of the system and the supporting ecological literature.
- The indicator characterizes the state of unmeasured structural and compositional resources and system processes.
- The indicator provides early warning of undesirable changes to important resources. It can signify an impending change in the ecological system.
- The indicator reflects the functional status of one or more key ecosystem processes or the status of ecosystem properties that are clearly related to these ecosystem processes. [Note: replace the term ecosystem with landscape or population, as appropriate.]
- The indicator reflects the capacity of key ecosystem processes to resist or recover from change induced by exposure to natural disturbances and/or anthropogenic stressors.

Criterion 3: Legal/Policy Mandate (Weight: 20 %) - This criterion provides additional weight to a potential vital sign if a park is directed to monitor specific resources because of some binding legal or Congressional mandate, such as specific legislation and executive orders, or park enabling legislation.

Table 2. The Ecological Monitoring Framework is a systems-based, heirarchical, organizational tool for promoting communication, collaboration, and coordination among parks, networks, programs, and agencies involved in ecological monitoring.

Level 1 Category	Level 2 Category	Level 3 Category
Air and Climate	Air Quality	Ozone
		Wet and Dry Deposition
		Visibility and Particulate Matter
		Air Contaminants
	Weather and Climate	Weather and Climate
Geology and Soils	Geomorphology	Windblown Features and Processes
		Glacial Features and Processes
		Hillslope Features and Processes
		Coastal/Oceanographic Features and Processes
		Marine Features and Processes
		Stream/River Channel Characteristics
		Lake Features and Processes
	Subsurface Geologic Processes	Geothermal Features and Processes

Level 1 Category	Level 2 Category	Level 3 Category
		Cave/Karst Features and Processes
		Volcanic Features and Processes
		Seismic Activity
	Soil Quality	Soil Function and Dynamics
	Paleontology	Paleontology
Water	Hydrology	Groundwater Dynamics
		Surface Water Dynamics
		Marine Hydrology
	Water Quality	Water Chemistry
		Nutrient Dynamics
		Toxics
		Microorganisms
Biological Integrity	Invasive Species	Aquatic Macroinvertebrates and Algae
		Invasive/Exotic Plants
	Infestations and Disease	Invasive/Exotic Animals
		Insect Pests
		Plant Diseases
	Focal Species or Communities	Animal Diseases
		Marine Communities
		Intertidal Communities
		Estuarine Communities
		Wetland Communities
		Riparian Communities
		Freshwater Communities
		Sparsely Vegetated Communities
		Cave Communities
		Desert Communities
		Grassland/Herbaceous Communities
		Shrubland Communities
		Forest/Woodland Communities
		Marine Invertebrates
		Freshwater Invertebrates
		Terrestrial Invertebrates
		Fishes
		Amphibians and Reptiles
		Birds
		Mammals
		Vegetation Complex (use sparingly)
		Terrestrial Complex (use sparingly)
	At-risk Biota	T&E Species and Communities
Human Use	Point Source Human Effects	Point Source Human Effects
	Non-point Source Human Effects	Non-point Source Human Effects
	Consumptive Use	Consumptive Use
	Visitor and Recreation Use	Visitor Use
	Cultural Landscapes	Cultural Landscapes
Landscapes (Ecosystem Pattern and Processes)	Fire and Fuel Dynamics	Fire and Fuel Dynamics
	Landscape Dynamics	Land Cover and Use
	Extreme Disturbance Events	Extreme Disturbance Events
	Soundscape	Soundscape
	Viewscape	Viewscape/Dark Night Sky
	Nutrient Dynamics	Nutrient Dynamics
	Energy Flow	Primary Production

A successful group decision-making process used by many of the I&M networks to prioritize vital signs involved the use of a database in a workshop setting with park managers and subject-matter experts to review and evaluate existing information and produce numerical rankings for a list of potential vital signs. Prior to holding a large, interdisciplinary workshop, a list of potential vital signs was developed based on a series of meetings, workshops, brainstorming sessions, questionnaires, literature reviews, and other information-gathering exercises to identify key monitoring questions and data needs. The list of potential vital signs was entered into a relational database that for each vital sign includes a justification statement about its importance, a draft set of monitoring questions and objectives, and other relevant information. Potential vital signs were first ranked by park managers and staff using criteria (Table 1) that are applied consistently across all parks and disciplines. The 3 criteria used by the majority of networks were Management Significance, Ecological Significance, and Legal Mandate. During the interdisciplinary workshop, subject-matter experts and managers working in teams were asked to review and improve the information in the database, and to consistently apply the criteria to rank the potential vital signs. Working with the highest-ranking vital signs, teams were then asked to develop specific measurable objectives and to identify existing protocols and partnership opportunities for each vital sign. Workshop results were documented in a report that was reviewed by all interested stakeholders, and was then used to guide park superintendents and/or technical committee members in the final step of selecting the initial set of vital signs to monitor.

Develop an Overall Sampling Design

All networks were required to develop an overall sampling design with the goals of (1) making unbiased and defensible inferences from sample observations to the intended target populations, and (2) encouraging the co-location of sampling sites and events among vital signs to improve efficiency and depth of ecological understanding. Monitoring protocols developed by each network provided more detailed descriptions of sampling design such as the size and location of sampling sites, how sites were selected, and the frequency of sampling for each vital sign.

Networks were guided by four basic principles in developing their overall sampling design:

- Wherever possible, some sort of probability design should always be used. Probability designs, where each unit in the target population has a known, non-zero probability of being included in the sample, and a random component is included in the selection of sampling sites, allow for unbiased inference from sampled sites to unsampled elements of the resource of interest (Hansen et al. 1983, McDonald 2003). Probability designs provide more reliable and defensible parameter estimates than model-based designs or convenience or judgment samples (Olsen et al. 1999, Schreuder et al. 2004), and they make it possible to provide measures of the precision of population estimates (Stevens and Olsen 2003). The most common spatially-balanced probability design is the Generalized Random Tessellation Stratified Design (GRTS; Stevens and Olsen 2003, 2004), which has been used by almost all of the park networks for a wide range of vital signs in both aquatic and terrestrial systems.
- Judgment samples that use "representative" sites selected by experts should not be used because they may produce biased, unreliable information (Olsen et al. 1999) and can often be easily discredited by critics.
- Stratification of the park using vegetation maps or other biological data or models is not recommended because stratum boundaries will change over time. A vegetation map is a model based on remote sensing and field data, and map boundaries will change as classification models are modified or as additional ground-truthing data becomes available. Using these units to define strata will limit (and greatly complicate) long-term uses of the data by restricting future park managers' abilities to include new information into the sampling framework. It is legitimate, and better, to delineate areas of special interest such as riparian or alpine areas based on physical characteristics such as terrain, and use these to judiciously define either strata or areas to sample with higher probability.
- Permanent plots that are revisited over time are recommended for monitoring, because the objective is to detect changes over time. Revisiting the same plots removes plot to plot differences from the change estimates, increasing the precision.

Develop Monitoring Protocols

A monitoring protocol is a detailed study plan that describes how data are to be collected, managed, analyzed, and reported, and is a key component of quality assurance for natural resource monitoring programs (Oakley et al. 2003). To be able to demonstrate that any changes in measurements are actually occurring in nature, and are not simply a result of measurements being taken by different people or in slightly different ways, long-term monitoring protocols require a large up-front investment in planning and design and must be fully documented, peer reviewed, and tested so that different people can take measurements in exactly the same way. Protocols should not rely on the latest instrumentation or technology that may change in a few years, such that measurements cannot be repeated.

Protocol development is an expensive, time-consuming process involving a research component. To promote consistency and data comparability and to reduce costs, existing protocols developed by other programs and agencies should be adopted or modified whenever monitoring objectives are similar. Monitoring protocols developed by our program are available on the internet in the NPS Protocol Database (NPS 2007). We also partner with the Association of Fish and Wildlife Agencies and numerous other federal and State agencies and private organizations to share protocols and monitoring project information through the Natural Resource Monitoring Partnership (NRMP 2007).

Establish Data Management, Analysis, and Reporting Procedures

Data and information are the primary products of ecological monitoring. As part of the Service's efforts to improve park management through greater reliance on scientific knowledge, a primary purpose of the monitoring program is to acquire, organize, and make available natural resource data and to contribute to the Service's institutional knowledge by facilitating the transformation of data into information and knowledge through analysis, synthesis, and modeling. A well-designed and well-documented data management system is particularly important for the success of long-term programs where the lifespan of a data set will extend across the careers of many scientists, and numerous changes in technology are to be expected.

Each network has developed a detailed plan for managing, analyzing, and reporting monitoring results (NPS 2007). Based on our evaluation of other long-term monitoring programs, all networks are expected to invest at least a third of their available resources in data management, analysis, and reporting to ensure that data are adequately entered into databases, quality-checked, analyzed, reported, archived, and made available to others for management decision-making, research, and education. All networks produce routine data summary reports, resource briefs, and occasional trend analysis and synthesis reports that are distributed in several formats to key audiences. Websites developed and maintained by each network are a key outlet for delivering monitoring results to park managers, planners, interpreters, the scientific community, and the general public.

Application of Monitoring Results to Natural Resource Stewardship

Natural resource monitoring provides site-specific information for understanding and identifying meaningful change in natural systems characterized by complexity, variability, and surprises. Monitoring results help managers determine whether observed changes are within natural levels of variability or may be indicators of unwanted human influences. The improved understanding of the status and trend in resource condition and "how park systems work" will be used by park managers to adjust management practices that sustain or improve the health of park resources, such as reallocating funding and staffing to achieve desired outcomes, initiating or modifying restoration activities, or working with State or federal partners to achieve desired outcomes. The I&M program has infused NPS with an increased scientific capacity to evaluate and interpret monitoring data. Staff dedicated to environmental monitoring have been added to parks and, as a result, on-the-ground management actions and stewardship planning activities are better informed.

In addition to providing information for management decision-making, monitoring results will be used for various park planning efforts (e.g., comparing estimates of current condition for key resources with desired conditions as part of developing management strategies), and for informing policy makers and the general public about the status and trend in key resources. The detailed, complex scientific data and information depicted as the lower levels of the information pyramid in Figure 6 must be aggregated and translated through data synthesis, modeling, and resource assessments to produce information products that effectively communicate monitoring results to policy makers and the general public. The networks are working with science communication specialists and interpreters to develop more effective summary reports and graphics for presenting monitoring results.

Summary and Future Challenges

The National Park Service has completed the first steps in developing a long-term ecological monitoring program to provide information on the status and trends of selected park resources as a basis for making decisions and working with other agencies and the public for the long-term protection of park ecosystems. We found that the basic steps involved in planning and designing a long-term ecological monitoring program were the same for a diverse range of ecological systems. The process of building the program seemed to be as important as the final result in terms of building a shared understanding between scientists and managers of what the priorities are for obtaining status and trend information, and why. Key benefits of our approach are that (1) the program is park-based, with a clear link between management needs and the monitoring information being provided; (2) it builds on and leverages current monitoring investments by NPS and other partners; and (3) it provides the basic information needed by a variety of other stewardship programs in the National Park Service. These benefits are key to the relevance and long-term sustainability of the monitoring program.

Key challenges for the many scientists, data managers, park staff, and collaborators involved with this long-term program are the need to develop integrated information products through data synthesis and modeling from the data sets and reports produced for individual vital signs, and the need to aggregate and translate the large amount of complex, scientific data to decision makers, policy makers, and the general public. With the limited staff and funding we have available, we must balance the need for collecting and analyzing new data with the need to better utilize and integrate existing data so that we can provide park managers, educators, and others with useful information products.

It is becoming increasingly accepted that parks must be managed as parts of larger ecological systems, and that scientific information must form the foundation for natural resource stewardship efforts to meet the NPS mission. The day-to-day tasks involved in managing a park's natural resources have become much more technically and politically complex. The National Park Service Advisory Board (2001) stated that "A sophisticated knowledge of resources and their condition is essential. The Service

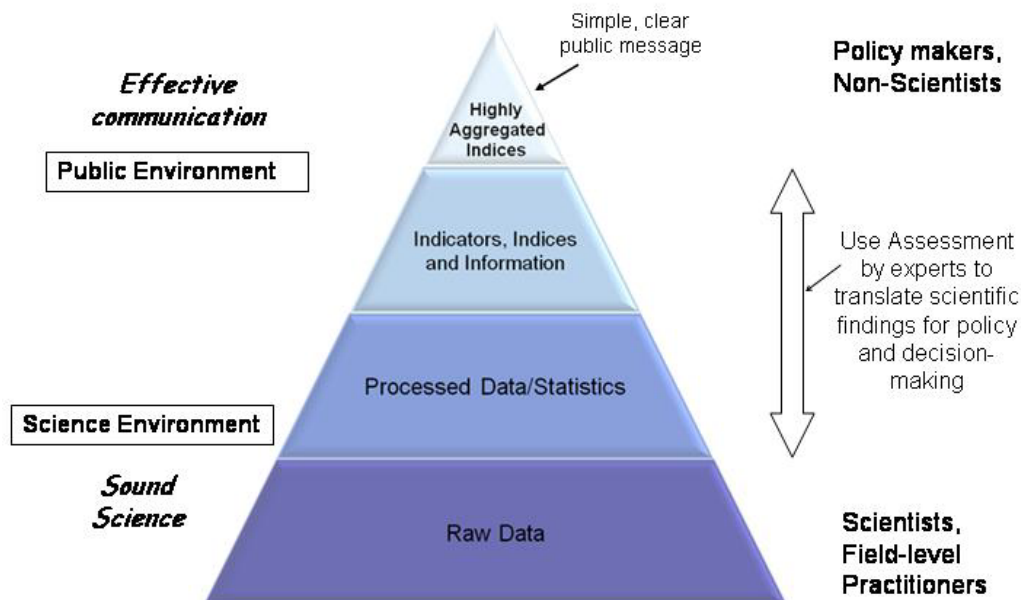


Figure 6. The information pyramid. The amount of detail and scale of analysis of scientific data will differ depending on the intended audience for the various reports and presentations. National-level reporting to policy makers and the general public will involve assessments by experts and presentations of data using highly aggregated indices and simple graphical messages. Results must be supported by a large amount of detailed, complex scientific data that is available at the park and network level.

must gain this knowledge through extensive collaboration with other agencies and academia, and its findings must be communicated to the public, for it is the broader public that will decide the fate of these resources.” As the National Park Service approaches its 100th anniversary, the establishment of this long-term monitoring program is an important step towards developing the sophisticated knowledge of resources and their condition that is needed to preserve parks unimpaired for the enjoyment, education, and inspiration of this and future generations.

Acknowledgements More than a thousand individuals have been actively involved in recent years in the development of the NPS vital signs program, including superintendents and resource staff from most of the parks, scientists and data managers with the 32 I&M networks, and subject-matter experts from federal and state agencies and more than 150 universities. We particularly want to thank Gary Davis, Gary Williams, Abby Miller, and Mike Soukup for their vision and support in developing this program. The U. S. Geological Survey provided expertise and funding for monitoring planning and design work, and we particularly thank Paul Geissler for his many contributions to this effort.

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