

**GOGA Dog Management SEIS acreage/mileage summary
October 2012**

| Milagra Ridge | | | | | | |
|--------------------------------|---------------|--------------|--------------|--------------|--------------|------------------|
| Measurements | Alt A | Alt B | Alt C | Alt D | Alt E | Preferred |
| Trails - On leash miles | 2.73 | 1.48 | 1.48 | | 1.65 | 1.48 |
| Trails - Off leash/ROLA miles | | | | | | |
| Beach - On leash miles | | | | | | |
| Beach - Off leash/ROLA miles | | | | | | |
| Other Acreage - on leash | | | | | | |
| Other Acreage - off leash/ROLA | | | | | | |
| Sweeney Ridge | | | | | | |
| Measurements | Alt A | Alt B | Alt C | Alt D | Alt E | Preferred |
| Trails - On leash miles | 6.84 | | | | 4.13 | 2.43 |
| Trails - Off leash/ROLA miles | | | | | | |
| Beach - On leash miles | | | | | | |
| Beach - Off leash/ROLA miles | | | | | | |
| Other Acreage - on leash | | | | | | |
| Other Acreage - off leash/ROLA | | | | | | |
| Cattle Hill | | | | | | |
| Measurements | Alt A* | Alt B | Alt C | Alt D | Alt E | Preferred |
| Trails - On leash miles | | | 1.12 | | 1.12 | 1.12 |
| Trails - Off leash/ROLA miles | | | | | | |
| Beach - On leash miles | | | | | | |
| Beach - Off leash/ROLA miles | | | | | | |
| Other Acreage - on leash | | | | | | |
| Other Acreage - off leash/ROLA | | | | | | *not yet GGNRA |

**GOGA Dog Management SEIS acreage/mileage summary
October 2012**

| Pedro Point | | | | | | | | |
|--------------------------------|---------------|--------------|--------------|--------------|--------------|------------------|----------------------------------|--|
| Measurements | Alt A* | Alt B | Alt C | Alt D | Alt E | Preferred | | |
| Trails - On leash miles | | 0.31 | 0.31 | | 2.40 | 0.31 | | |
| Trails - Off leash/ROLA miles | | | | | | | | |
| Beach - On leash miles | | | | | | | | |
| Beach - Off leash/ROLA miles | | | | | | | | |
| Other Acreage - on leash | | | | | | | | |
| Other Acreage - off leash/ROLA | | | | | | | *not yet GGNRA | |
| | | | | | | | | |
| Rancho Corral de Tierra | | | | | | | | |
| Measurements | Alt A | Alt B | Alt C | Alt D | Alt E | Preferred | | |
| Trails - On leash miles | 16.2* | 6.48 | 6.48 | 1.10 | 6.48 | 6.48 | Alt A mileage for info only | |
| Trails - Off leash/ROLA miles | | | | | | | Note: alts B, C, D, E updated | |
| Beach - On leash miles | | | | | | | trail milage to reflect alt maps | |
| Beach - Off leash/ROLA miles | | | | | | | | |
| Other Acreage - on leash | 3858.00 | | | | | | | |
| Other Acreage - off leash/ROLA | | | 1.39 | | 1.39 | | | |

Commercial Dog Walking Interim Permit Requirement Proposal

August 2013

INTRODUCTION

The National Park Service, Golden Gate National Recreation Area (GGNRA) is considering requiring permits for persons walking four or more dogs at one time for consideration (commercial dog walker) on lands under the administrative jurisdiction of GGNRA in City and County of San Francisco and Marin County where dog walking is allowed for the interim period prior to the promulgation of a final rule for dog walking in GGNRA, anticipated in 2015. Permits under this interim program would allow a maximum of six dogs per dog walker, and require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA. Permit holders must abide by all National Park Service (NPS) regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice control dog walking per the 1979 Pet Policy.



In a related action, the Presidio Trust (Trust), a federal agency governing the interior Presidio lands that area within the GGNRA boundary, is also proposing an interim public use limit on persons who are walking four or more dogs at one time for consideration (commercial dog walkers) in Area B of the Presidio of San Francisco (Presidio). The limit will require any commercial dog walker with four or more dogs at one time in Area B to possess a valid commercial dog walking permit obtained from GGNRA. Commercial dog walkers will be required to comply with the terms and conditions of the GGNRA permit as well as those rules and regulations otherwise applicable to Area B of the Presidio.

This document outlines and describes the reasons why action is needed.

Purpose of the Proposed Action

This proposed interim permit requirement is a direct response to commercial dog walking permit programs recently enacted by the San Francisco Board of Supervisors and the Town of Tiburon

in Marin County which went into effect in July 2013, and which limit the number of dogs per commercial dog walker to 8 or 6 dogs, respectively.

The proposed permit requirement would be adopted as an interim measure and would be replaced by a new regulation governing dog walking in GGNRA that would be published in Title 36 of the Code of Federal Regulations. The new regulation would be developed after GGNRA completes the dog management planning project which addresses both recreational and commercial dog walking. The plan and its accompanying environmental impact statement (EIS) are well underway; a draft Plan/EIS was released for public comment in 2011 and a supplemental draft Plan/EIS is expected to be released for additional public comment in Fall 2013. Once the plan is finalized, the NPS will initiate a rulemaking process and seek public comment on the proposed codification of the dog management plan's regulatory elements in the Code of Federal Regulations. A final rule is not anticipated until 2015. In the absence of this interim action, if the status quo is not changed, commercial dog walkers would continue walking unlimited number of dogs at GGNRA sites where dog walking is currently allowed.



Need for the Proposed Action

Given the extremely broad geographical reach (parks, open spaces, Port of San Francisco lands, and San Francisco Public Utility Commission properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, GGNRA reasonably anticipates that a number of commercial dog walkers, who would otherwise use areas that would cause them to fall under these ordinances, will instead

walk their dogs in areas managed by GGNRA in San Francisco and Marin Counties that are already regularly used by dog walkers, including commercial dog walkers. The San Francisco ordinance on commercial dog walking went into effect July 1, 2013, although there is a 120 day grace period to allow completion of permit training requirements. As of August X, XX commercial dog walking permits had been issued by San Francisco's Animal Care and Control. The City of Tiburon's permit program went into effect July 19, 2013; as of XXX, 2 permits had been issued by the City of Tiburon.

Research and interviews conducted as part of the GGNRA's dog management planning project indicate that there are now at least 100 commercial dog walkers in the City and County of San Francisco, although there are also commercial dog walkers who do not have a business license and are not listed in the phone book. Many of these dog walkers are single individuals (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco (Prodog). In a recent interview about San Francisco's new commercial dog walking ordinance, a spokesperson for ProDog estimated that there might be as many as 300 commercial dog walkers in San Francisco. In San Francisco, the GGNRA sites most often used by commercial dog walkers are Fort Funston, Crissy Field and Fort Mason, but commercial dog walkers are also seen at Baker Beach and Ocean Beach.

Commercial dog walkers typically bring between four and ten dogs or more at a time to GGNRA sites and spend about one hour, twice a day, in the park.

The San Francisco ordinance is anticipated to have a noticeable impact, particularly at Fort Funston and Crissy Field, the two sites regularly used by dog walkers. Crissy Field already receives very high visitor use (approximately 3.2 million in 2009), including from individual and commercial dog walkers. GGNRA staff estimates that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays), and typically at least three present, with at least four to eight dogs each, at any given time of the day. A 2011 Visitor Use Study found that 24% of visitors at Crissy Field were dog walkers. That same study found that at Fort Funston, where the average number of dogs walked on the site each day is 1,600, approximately 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends). On weekends, 3.1% of dogs at Fort Funston are walked in groups larger than 6, accounting for 10 dog walker visits. However, on weekdays, 34.7% of dogs were in groups larger than 6, accounting for approximately 127 dog walker visits. Of that group 19.4% of dogs were in groups larger than 8 (approximately 61 dog walker visits). The study notes: “At Fort Funston, many visitors were observed with large groups of dogs. While some of these visitors may be individuals who own multiple dogs, most are likely professional dog walkers.”



Marin County Parks and Open Space began requiring permits for commercial dog walkers on Open Space lands in 2002; the permits allowed a maximum of 6 dogs per walker. Currently, certain GGNRA-managed sites in southern Marin are used by commercial dog walkers with more than six dogs per person; dog walkers with six or more dogs have been seen at both Rodeo Beach and the Alta Trail above Marin City. The Alta Trail, an easily accessible GGNRA site in close proximity to Tiburon, is regularly used by commercial dog walkers who have an average of ten dogs per dog walker. GGNRA staff have often experienced up to 50 off-leash dogs at one time on the Alta Trail. Because of the ease of access from Highway 101, availability of on-street parking at the trailhead and proximity to Tiburon, Alta Trail is likely to be an alternative for those commercial dog walkers who would otherwise use Tiburon open space areas, where there is now a permit requirement and limit of 6 dogs per walker. Without an interim restriction on commercial dog use, commercial dog walking could increase on GGNRA lands in southern Marin, particularly the Alta Trail, which is also used by private dog walkers, hikers, runners and bicyclists.

Visitor Experience and Safety

In heavily used areas, and areas popular with multiple user groups, limiting the number of dogs per dog walker for this interim period would lessen the potential for conflict between user groups by allowing better control by dog walkers. Additionally, a limit on the number of dogs, would address the safety and visitor experience concerns of other users, including private dog walkers, who have been displaced from areas regularly used by commercial dog walkers. Numerous comments on the draft Dog Management Plan/EIS and visitor complaints received by park staff have voiced safety and visitor experience concerns about large groups of dogs that are not adequately supervised or controlled. Additional control made possible by dog walkers with smaller groups of dogs would also address park employee concerns about working outdoors in areas heavily used by dog walkers, including commercial dog walkers.

The maximum number of dogs per commercial dog walker in this proposed interim permit program was drawn from the dog management planning process. The permit conditions for commercial dog walkers proposed in the preferred alternative of the draft dog management plan/EIS (draft plan/EIS), including the number of dogs allowed per dog walker, were developed initially by the GGNRA Negotiated Rulemaking Committee for Dog Management, and further developed in the draft Plan/EIS. During the public comment period on the draft Plan/EIS, the



NPS received multiple comments regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the number at six dogs with strict guidelines. Other commenters, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker, with some noting that four or more dogs could be hard to control. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of

dogs to a maximum of six, while other commenters requested that commercial dog walking not be allowed at all.

In proposing alternatives for the maximum number of dogs per walker in the draft plan/EIS, the NPS was concerned first and foremost with resource protection and visitor experience and safety, key objectives of the draft plan/EIS. The NPS questioned whether a dog walker could consistently control more than six dogs in areas open to voice control, particularly in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. The NPS was unable to find literature supporting the idea that more than six dogs would not damage park resources or impact visitor experience and safety, or put another way, would provide both resource protection and visitor experience and safety. Based on public comment, feedback from the GGNRA Negotiated Rulemaking Committee for dog management, park staff observations and research, and law enforcement experience, the NPS concluded that allowing more than six dogs total could negatively impact visitor experience

and visitor and employee safety. It should also be noted that the commercial dog walker legislation information pamphlet developed by San Francisco's Animal Care and Control states that the maximum limit is 8 dogs per walker and that 6 dogs per dog walker is recommended. The preferred alternative proposed in the draft Plan/EIS would require that commercial and private dog walkers with more than three dogs obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites, all of which are in either Marin or San Francisco counties.

This proposed interim permit requirement follows the requirements in the draft Plan/EIS in that it would impose a maximum of 6 dogs per commercial dog walker for visitor and employee safety, however, it would not limit commercial dog walkers to certain park sites. Rather, all GGNRA sites open to dog walking in San Francisco and Marin would be available for commercial dog walkers under this interim permit requirement.

NEXT STEPS

Comments to GGNRA may be submitted online at https://parkplanning.nps.gov/*add shortlink name, or by mail to:

National Park Service
Golden Gate National Recreation Area
Attn: Commercial Dog Walking
Fort Mason, Building 201
San Francisco, CA 94123

Comments to the Trust may be submitted electronically to cdw@presidiotrust.gov, or by mail to:

The Presidio Trust
Attn: John Pelka
103 Montgomery Street
P.O. Box 29052
San Francisco, CA 94129

Public Availability of Comments: If individuals submitting comments request that their address or other contact information be withheld from public disclosure, it will be honored to the extent allowable by law. Such requests must be stated prominently at the beginning of the comments. The Trust will make available for public inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses.

All written comments submitted to GGNRA and the Trust will be considered, and these proposals may be modified accordingly. If GGNRA approves implementation, the park's Compendium would be amended and the public would be notified through community outreach, outreach to dog walking organizations, brochures and the Park's website. The final decision of the Trust will be published in the Federal Register.

Some questions that the technical subcommittee could help in addressing:

1. For each park site, compare the “current conditions” chart with what you believe is the case for the degree of use. Use following definitions:

High- Park site beaches, trails or other features are nearly always occupied and are often crowded.

Moderate- Park site beaches, trails or other feature are usually occupied, but the area is only occasionally crowded.

Low- Visitors sometimes see other visitors, but the area is never crowded.

2. What percentage of visitors are usually walking dogs?

High- More than one in three visitors are walking dogs

Moderate- Approximately one in ten to one in 3 visitors are walking dogs

Low- Fewer than about one in ten visitors are walking dogs

3. What are the typical kinds of uses (e.g. picnicking, walking, jogging, sunbathing, equestrian, birdwatching, photographing wildlife, scenery, watersports, etc.) other than dog walking at each park site? Please include following in your response:

- Itemize use by trail or specific locations in park sites, if helpful.
- Where are these non-dog walking uses intense?
- Any differences in the use or intensity during a particular season?
- Any differences in the use during different times of the day?

4. Are there particular park sites or locations within a park site frequented more often by groups that might be sensitive to dogs?

- What are those groups (young children, elderly, disabled, etc.)?
- Are there any seasonal or daily differences in how you believe these groups use the park site(s)?

5. What do you believe are the elements of a park site that make it attractive for dogwalking? (e.g. close to home, beach, unconfined, etc.). Is there a difference in desirable characteristics for on-leash vs. voice controlled dogwalking?

6. What are the visitor uses or physical, natural or other features of a park site that you believe lead to a potential conflict situation? (small area, high use, varied use, etc.).

7. How would you define a conflict?

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:
W34 (GOGA-SUPT)

Memorandum

To: General Superintendent, Golden Gate National Recreation Area

From: Shirwin Smith, Management Assistant
Kevin Cochary, Chief Ranger

Subject: Interim Compendium Amendment for Commercial Dog Walking

Summary:

We recommend that you exercise the discretionary authority delegated to you under 36 C.F.R. Section 5.3 to adopt an interim Compendium amendment that would require that any person walking three or more dogs at one time for consideration (commercial dog walker) in any Marin or San Francisco site of Golden Gate National Recreation Area (GGNRA) where dog walking is allowed, must first obtain a permit from the park. This action is a direct response to commercial dog walking permit programs enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which will be in effect July, 2013, and which will limit the number of dogs per dog walker to 8 or 6 dogs, respectively.

Although the GGNRA dog management planning project which addresses commercial dog walking is well underway, a final rule is not anticipated until 2015. In the absence of that final rule, commercial dog walkers are not regulated and thus may walk an unlimited number of dogs at GGNRA park sites where dog walking is currently allowed.

Recommended Regulatory Action

We recommend that you approve an interim, limited compendium amendment to respond to commercial dog walking permit programs enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which will be in effect July, 2013, and which will limit the number of dogs per dog walker to 8 or 6 dogs, respectively. Given the extremely broad geographical reach (parks, open spaces, Port lands, and PUC properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the NPS reasonably anticipates that a number of commercial dog walkers, who would otherwise use areas that would cause them to fall

under these ordinances, will instead walk their dogs in areas under the administrative jurisdiction of the NPS in San Francisco and Marin Counties that are already regularly used by dog walkers, including many commercial dog walkers. Commercial dog walking is not yet regulated in NPS areas in San Francisco and Marin, thus commercial dog walkers using NPS sites could avoid the permit fees, requirements, and limit on the number of dogs they may walk on San Francisco and Tiburon lands covered by the new local ordinances.

The proposed text of the Compendium amendment is as follows:

Any person walking three or more dogs at one time for consideration (commercial dog walker) in any site under the administrative jurisdiction of GGNRA within the City and County of San Francisco or Marin County, where dog walking is allowed, must first obtain a permit from the park.

- Permits will allow a maximum number of six dogs per dog walker.
- Permits will require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA
- Permit holders must abide by all NPS regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice control dog walking per the 1979 Pet Policy (Attachment C).

If approved, this Compendium amendment would remain in effect until the final special regulation for dog walking in GGNRA is promulgated in 2015.

Justification

The San Francisco Board of Supervisors passed an ordinance in February 2012 that requires all commercial dog walkers in San Francisco city parks (including some lands managed by the Port of San Francisco and by the San Francisco Public Utilities Commission) to obtain a permit for that use. The San Francisco permit program will require proof of a business license, insurance and training, and will limit the number of dogs per dog walker to eight.

The Town of Tiburon in Marin County is in the process of enacting a permit program for commercial dog walkers on open space lands managed by the town; those permits will also require proof of business license, insurance and training, and will limit the number of dogs per walker to six.

Both the San Francisco and Tiburon permit programs are expected to be in place by July 2013. After that, GGNRA San Francisco and Marin sites that allow dog walking will be the only open space lands in those two counties with unregulated commercial dog walking.

Commercial dog walkers have been using GGNRA's San Francisco and Marin sites for at least ten years. During that time, the GGNRA dog management planning process had already begun, and the decision as to whether commercial dog walking should be permitted on GGNRA lands was deferred to the dog management planning process and its accompanying NEPA analysis and rulemaking. Over the past ten years, the number of commercial dog walkers in San Francisco and Marin has increased. Research and interviews for the draft dog management plan/EIS indicate that there are now at least 100 commercial dog walkers in the city, although there are also commercial dog walkers who do not have a business license and are not listed in the phone book. Many of these dog walkers are single individuals (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco (Prodog). In San Francisco, commercial dog walkers most often use GGNRA's Fort Funston and Crissy Field, but are also seen at Fort Mason, Baker Beach and Ocean Beach. Commercial dog walkers typically bring between four and ten dogs or more at a time to GGNRA sites and spend about one hour, twice a day, in the park.

The San Francisco ordinance is anticipated to have a noticeable impact, particularly at Fort Funston and Crissy Field, the two sites most regularly used by dog walkers. Crissy Field already receives very high visitor use (approximately 3.2 million in 2009), including from individual and commercial dog walkers. GGNRA staff estimates that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays), and typically at least three present, with at least four to six dogs each, at any given time of the day. A 2011 Visitor Use Study (Appendix D) found that 24% of visitors at Crissy Field were dog walkers. That same study found that at Fort Funston, an average of 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends), and that on weekdays, 50% of the dogs observed were in groups of five or more dogs, with approximately 15% in groups of ten or more dogs. The 2009 visitation at Fort Funston was estimated at 546,000.

Marin County Parks and Open Space began requiring permits for commercial dog walkers on Open Space lands in 2002; the permits allowed a maximum of 6 dogs per walker. Currently, certain GGNRA-managed sites in southern Marin are used by commercial dog walkers with more than six dogs per person; dog walkers with six or more dogs have been seen at both Rodeo Beach and the Alta Trail above Marin City. The Alta Trail is regularly used by commercial dog walkers who have an average of ten dogs per walker. GGNRA staff have often experienced up to 50 off-leash dogs at one time on the Alta Trail.

The preferred alternative for GGNRA's draft dog management plan currently requires that commercial and private dog walkers with more than three dogs must obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites. However, the preferred alternative may change in light of public comment received on the supplemental EIS and Notice of Proposed Rulemaking. Also, a number of steps remain before a final regulation for dog walking in GGNRA could be promulgated. A Supplemental EIS for the draft dog management plan will be released for public comment in summer 2013. A Notice of Proposed Rulemaking

will be released in 2014 for an additional public comment, with a final rule anticipated in 2015. In the absence of that final rule, commercial dog walkers are not regulated and thus may walk unlimited number of dogs at GGNRA park sites.

The maximum number of dogs per commercial dog walker in this proposed interim compendium amendment was drawn from the permit conditions for commercial dog walkers developed in the dog management planning process. The permit conditions for commercial dog walkers in the preferred alternative of the draft dog management plan/EIS (draft plan/EIS), including the number of dogs allowed per dog walker, were developed initially by the GGNRA Negotiated Rulemaking Committee for dog management, and further developed in draft Plan/EIS. During the public comment period on the draft Plan/EIS, the National Park Service (NPS) received multiple comments regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the number at six dogs with strict guidelines. Other commenters, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker, with some noting that four or more dogs could be hard to control. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of dogs to a maximum of six, while other commenters requested that commercial dog walking not be allowed at all.

In establishing the maximum number of dogs per walker in the draft plan/EIS, the NPS was concerned first and foremost with resource protection and visitor experience and safety, two key objectives of the draft plan/EIS. The NPS questioned whether a dog walker could consistently control more than six dogs in areas open to voice control, particularly in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. The NPS was unable to find literature supporting the idea that more than six dogs would not damage park resources or impact visitor experience and safety, or put another way, would provide both resource protection and visitor experience and safety. Based on public comment, feedback from the GGNRA Negotiated Rulemaking Committee for dog management, park staff observations and research, and law enforcement experience, the NPS believes that allowing more than six dogs total could negatively impact visitor experience and visitor and employee safety. Thus the maximum of 6 dogs per commercial dog walker is proposed in this interim compendium amendment, consistent with the draft plan/EIS, for protection of resources and visitor and employee safety.

Applicable Law and Policy:

This interim Compendium amendment appropriately regulates a commercial activity on National Park Service lands, as required by 36 CFR § 5.3, Business Operations and per the guidance of Section 8.1, Use of the Parks, of the National Park Service Management Policies 2006.

This action allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other

park users and park resources. Further, commercial dog walking was not addressed by the 1979 GGNRA Citizen's Advisory Pet Policy (Attachment C), and has not ever been a permitted activity in the park. As stated previously, at the time that the park became aware of this new use of park areas, the GGNRA dog management planning process had already begun, and the decision as to whether commercial dog walking should be permitted on GGNRA lands was deferred to the dog management planning process and its accompanying NEPA analysis and rulemaking.

Process for Adopting Compendium Restrictions:

Under 36 C.F.R. Section 1.5, superintendents are authorized to take action to protect park resources. In both emergency and non-emergency situations, park superintendents may adopt compendium provisions that impose conditions or restrictions on a use or activity.

As stated above, this interim compendium amendment is necessary to protect public and employee health and safety during the time between the enacting of two local ordinances that will restrict commercial dog walking on adjacent public lands, and the promulgation of a final rule for dog walking in GGNRA which will include restrictions and a permit requirement on commercial dog walkers. This interim compendium amendment allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other park users and park resources. This action will also serve to minimize conflict among visitors by enabling greater control by commercial dog walkers.

In that this interim action is based in a proposal for commercial dog walking developed with much public input during the GGNRA dog management planning effort, and that the proposed regulatory provisions are the minimum level acceptable to meet the park's management obligations with regard to the protection of visitor and employee safety and park resources, this is not anticipated to be a highly controversial nature.

NEPA Compliance:

The Handbook for NPS Director's Order 12 contains a listing of Categorical Exclusions. Section 3.4 A(5) of the Director's Order 12 Handbook provides that "Issuances, extensions, renewals, reissuances or minor modifications of concession contracts or permits not entailing new construction or new environmental impact as a result of concession operations." may be categorically excluded under NEPA.

This compendium amendment that permits allowing a maximum of 6 dogs per dog walker be required for commercial dog walking within GGNRA Marin and San Francisco sites that are open to dog walking would result in minor changes to commercial dog walking activities in the park. The park has prepared all the appropriate Categorical Exclusion screening forms, which are attached for your review. These forms disclose that the actions would result in no measurable adverse environmental effects. Furthermore, no exceptional circumstances or conditions exist that would make use of a

Categorical Exclusion inappropriate. As such, we believe that a Categorical Exclusion under NEPA is the appropriate form of NEPA compliance for this regulatory provision.

Public Notice:

The park will provide public notice as described in 36 C.F.R. Section 1.7., specifically through community outreach, outreach to dog walking organizations, brochures and the Park's website.

Attachments:

A - Compendium Amendment

B - NEPA Categorical Exclusion Documentation

C - 1979 GGNRA Citizen's Advisory Commission Pet Policy

D - Leggett and Curry, Assessment of Visitor Activities at Six Sites Within Golden Gate National Recreation Area, 2011

Concurrence:

/s/
(signed original on file)
General Superintendent, Golden Gate NRA

Date

Attachment C
1979 GGNRA Citizen's Advisory Pet Policy

Attachment D

**Leggett and Curry, Assessment of Visitor Activities at Six Sites Within
Golden Gate National Recreation Area, 2011**

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GOLDEN GATE NATIONAL RECREATION AREA

**Commercial Dog Walking ~~Public~~-Use Limit and Permit Requirement
Interim Compendium Amendment**

Summary: ~~The public is invited to comment on the~~ Golden Gate National Recreation Area (GGNRA) ~~invites the public to comment on a~~ proposal to ~~impose-require-establish~~ a public use limit and permit requirement ~~on-for park visitors persons~~ who are walking four or more dogs at one time for ~~consideration (commercial dog walker)~~ **commercial purposes** on ~~lands under the administrative jurisdiction of the~~ National Park Service **lands** in Marin County and the City and County of San Francisco, where dog walking is allowed.

Permits will allow a maximum of six dogs per dog walker, and require a business license and proof of liability insurance and approved dog-handling training through existing training courses, ~~such as those offered by Marin Humane or SF SPCA~~. Permit holders must abide by all NPS regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in **length in** sites that are not open to voice control dog walking per the 1979 Pet Policy. **The annual permit cost would be a \$375.00, including a \$75.00 application fee and \$300 per [redacted] non-transferrable badge.**

Comment [EMB1]: Per what? Per person or per company?

This public use limit would be an interim action. ~~GGNRA intends that~~ **It** would remain in effect until a final special regulation for dog walking, including commercial dog walking, in GGNRA is promulgated. That ~~final special~~ regulation is anticipated in ~~late~~ 2015. Should the Superintendent of GGNRA ~~decide to~~ approve this interim public use limit and permit system, an amendment to GGNRA's Compendium¹ would be completed.

~~The NPS thanks you for your participation in this process.~~

Dates:

Comments on this proposal must be received by XXX, XX, 2013.

Addresses:

Comments may be submitted online at https://parkplanning.nps.gov/*add shortlink name, or by mail to:

Comment [EMB2]: Should not be something close to the dog plan.

Also, depending on the release date, we need language that clarifies that these public comments have nothing to do with the dog plan/SEIS, which is a separate process.

Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, CA 94123
Attn: Commercial Dog Walking

For Further Information:

Leave a message on the Dog Management Information Line; park staff monitor the line and will respond promptly. [redacted]

Comment [EMB3]: I would instead just list a number. The message will say the rest.

¹ GGNRA's Compendium is a listing of all park closures and use limits within the GGNRA.

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Background:

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This proposed public use limit and permit requirement is a direct response to commercial dog walking permit programs recently enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County. ~~These permit programs which~~ limit the number of dogs per commercial dog walker to 8 or 6 dogs, respectively. ~~Because of these ordinances, Given the extremely broad geographical reach (parks, open spaces, Port of San Francisco lands, and San Francisco Public Utility Commission properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the~~ NPS reasonably anticipates that a number of commercial dog walkers, who ~~would otherwise use~~ the areas in San Francisco and Tiburon ~~that would cause them to fall under~~ subject to these ordinances, will instead walk their dogs in NPS areas under the administrative jurisdiction of the NPS in San Francisco and Marin Counties that are already heavily ~~regularly~~ used by dog walkers, including commercial dog walkers.

The San Francisco ordinance on commercial dog walking went into effect July 1, 2013, ~~however, given the~~ with a 120-day grace period to November 1, 2013, to allow completion of permit training requirements, ~~the effective date of that action is XXXXXXXXXXXX. As of September 25, 2013, XX~~ commercial dog walking permits had been issued by San Francisco's Animal Care and Control. The City of Tiburon's permit program went into effect July 19, 2013; as of September 25, 2013, XX permits had been issued by the City of Tiburon.

The proposed ~~public-commercial~~ use limit and permit requirement would be adopted as an interim measure that will be replaced by a special regulation ~~for dog walking in GGNRA~~ after the NPS completes the GGNRA dog management planning ~~project~~ process, which addresses both commercial and recreational dog walking. ~~Without this interim action, commercial dog walkers would be able to continue walking unlimited number of dogs at GGNRA sites where dog walking is currently allowed.~~ The dog management plan and its accompanying environmental impact statement (EIS) are well underway. Once the plan and EIS are nearing finalization, the NPS will ~~develop~~ initiate a rulemaking process and seek public comment on a rule that ~~codifies~~ codifies ~~the~~ dog management plan's regulatory elements in the Code of Federal Regulations. A final rule is not anticipated until 2015. ~~When that rule is adopted, the Interim Commercial Dog Walking Use Limit and Permit Requirement will expire. Without this interim action, commercial dog walkers would be able to continue walking unlimited number of dogs at GGNRA sites where dog walking is currently allowed.~~ In heavily used areas, especially areas popular with multiple user groups, limiting the number of dogs per dog walker for this interim period would lessen the potential for conflict between user groups by allowing better control by dog walkers. Additionally, a limit on the number of dogs would address the safety and visitor experience concerns of other users, including private dog walkers, who have been displaced from areas heavily used by commercial dog walkers where large groups of dogs are not always well controlled. Numerous comments on the draft Dog Management Plan/EIS and visitor complaints received by park staff have voiced safety and visitor experience concerns about large groups of dogs that are not adequately supervised. Additional control made possible by limiting the number of dogs walked at one time by commercial dog walkers would also address park employee concerns about working outdoors in areas heavily used by commercial dog walkers.

Comment [EMB4]: Are there actual incidents specific to commercial, vs. private dogwalkers?

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San Francisco Commercial Dog Walking

Research and interviews conducted as part of GGNRA's dog management planning ~~project process~~ indicate that there are now at least 100 commercial dog walkers in the City and County of San Francisco. ~~_, although T~~ there are also commercial dog walkers who ~~operate without do not have~~ a business ~~license license~~, and are not listed in the phone book. ~~Many of T~~ these ~~include individual~~ dog walkers ~~are single individuals~~ (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco (ProDog). In a ~~recent [month/year]~~ interview about San Francisco's new commercial dog walking ordinance ~~[where was the interview reported?]~~, a spokesperson for ProDog estimated that there might be as many as 300 commercial dog walkers in San Francisco. ~~In San Francisco, the GGNRA sites most often used by commercial dog walkers are Fort Funston, Crissy Field and Fort Mason, but commercial dog walkers are also seen at use Baker Beach and Ocean Beach. Commercial dog walkers typically bring between four and ten or more dogs or more at a time to GGNRA sites, and spend about one hour, twice a day, in the park, twice daily.~~

The San Francisco ordinance is anticipated to have a noticeable impact ~~on GGNRA's San Francisco lands~~, particularly at Fort Funston and Crissy Field, ~~the two sites most regularly used by dog walkers~~. Crissy Field already receives very high visitor use (approximately 3.2 million in 2009 ~~[where did this figure come from? – seems high – also use more recent year]~~), including from ~~individual and commercial and non-commercial~~ dog walkers. GGNRA ~~staff estimates~~ that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays) ~~with at least four to eight dogs each~~, and typically at least three present ~~at any one time. , with at least four to eight dogs each, at any given time of the day.~~ A 2011 Visitor Use Study ~~[add citation in footnote and/or maybe a link]~~ found that 24% of visitors at Crissy Field were dog walkers. That same study found that ~~at Fort Funston, where the average number of dogs walked at the site each day is 1,600, an average of 62% of daily visitors at Fort Funston were dog walkers (66% on weekdays and 57% on weekends). On weekdays, 34.7% of dogs at Fort Funston were in groups larger than six, with almost 14% of those dogs in groups larger than eight. On weekends, the percentage of dogs 3.1% of dogs at Fort Funston are walked in groups larger than six at Fort Funston is 3.1 %, accounting for 10 dog-walker visits. However, on weekdays, 34.7% of dogs were in groups larger than 6, accounting for approximately 127 dog-walker visits. Of that group 19.4% of dogs were in groups larger than 8, (approximately 61 dog-walker visits). The study notes: "At Fort Funston, many visitors were observed with large groups of dogs. While some of these visitors may be individuals who own multiple dogs, most are likely professional dog-walkers."~~

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~~In heavily used areas, and areas especially popular with multiple user groups, limiting the number of dogs per dog walker for this interim period would lessen the potential for conflict between user groups by allowing better control by dog walkers. Additionally, a limit on the number of dogs would address the safety and visitor experience concerns of other users, including private dog walkers, who have been displaced from areas heavily used by commercial dog walkers where large groups of dogs are not always well controlled. Numerous comments on the draft Dog Management Plan/EIS and visitor complaints received by park staff have~~

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~~voiced safety and visitor experience concerns about large groups of dogs that are not adequately supervised. Additional control made possible by limiting the number of dogs walked at one time by commercial dog walkers would also address park employee concerns about working outdoors in areas heavily used by commercial dog walkers.~~

Comment [EMB5]: Are there actual incidents specific to commercial, vs. private dogwalkers?

Marin County Commercial Dog Walking

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~~Marin County Parks and Open Space began requiring permits for commercial dog walking permits on Open Space lands in 2002; the permits allowed a maximum of 6 dogs per walker. Currently, Certain GGNRA-managed sites in southern Marin, particularly Rodeo Beach and Alta Avenue above Marin City, are used by commercial dog walkers with more than six dogs per person; dog walkers with six or more dogs have been seen at both Rodeo Beach and the Alta Trail above Marin City. The Alta Trail, an easily accessible GGNRA site in close proximity to the town of Tiburon, is regularly used by commercial dog walkers who have an average of ten dogs each [how do we know?]. GGNRA staff have often experienced up to 50 off-leash dogs at one time on the Alta Trail. [?? How many are commercial?] Because of the ease of access and parking from Highway 101, availability of on-street parking at the trailhead and proximity to Tiburon, without an interim use limit and permit requirement, Alta Trail is likely to be an alternative for those commercial dog walkers who would otherwise use Tiburon open space areas where there is now a permit requirement and six dog limit of 6 dogs per walker. Without an interim use limit and permit requirement for commercial dog walking, that use could increase on GGNRA lands in southern Marin, particularly on the Alta Trail which is also popular with private dog walkers, hikers, runners and bicyclists.~~

How the Proposed Interim Six-Dog Limit and Permit Requirement was Determined

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~~The maximum number of six dogs per commercial dog walker in this proposed interim compendium amendment was drawn from the permit conditions for commercial dog walkers developed in the dog management planning process. The number of dogs allowed per dog walker and the permit conditions –including the number of dogs allowed per dog walker– were developed initially by the GGNRA Negotiated Rulemaking Committee for dog management in 2006 [??], and later incorporated proposed in the preferred alternative of the draft Dog Management Plan/Environmental Impact Statement (draft plan/EIS) released in 2011, and the just-released second draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) released in September 2013, were developed initially by the GGNRA Negotiated Rulemaking Committee for dog management, and further developed in the draft Plan/EIS. During the public comment period on the draft Plan/EIS, the National Park Service (NPS) received multiple comments regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the six dog limit, number at six dogs with strict guidelines. Other commenters, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker. Some commenters noted, with some noting that four or more dogs could be hard to control. Other commenters requested that commercial dog walking not be allowed at all. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of dogs to a maximum of six, while other commenters requested that commercial dog walking not be allowed at all.~~

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~~Based on public comment, feedback from the GGNRA Negotiated Rulemaking Committee for dog management, park staff observations, research on national and international best practices and law enforcement experience, the NPS believes that allowing more than six dogs total could negatively impact visitor experience and visitor and employee safety.~~ In proposing alternatives for the maximum number of dogs per walker in the draft plan/EIS, the NPS was concerned first and foremost with visitor experience and safety, as well as resource protection, key objectives of the plan. ~~The NPS questioned whether a dog walker could consistently control more than six dogs in areas open to voice control, of particular concern in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience.~~ The NPS was unable to find literature supporting the idea that more than six dogs would not impact visitor experience and safety or damage park resources or, put another way, would provide both visitor experience and safety and resource protection. ~~Based on public comment, feedback from the GGNRA Negotiated Rulemaking Committee for dog management, park staff observations, research on national and international best practices and law enforcement experience, the NPS believes that allowing more than six dogs total could negatively impact visitor experience and visitor and employee safety. It should be noted that the commercial dog walker legislation information pamphlet developed by San Francisco’s Animal Care and Control states that 8 dogs per walker is the limit, but immediately thereafter notes that 6 dogs per dog walker is recommended.~~

The preferred alternative proposed in GGNRA’s draft Plan/EIS and SEIS ~~would require that commercial and private dog walkers with more than three dogs obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites, all of which are in either Marin or San Francisco counties.~~

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This proposed interim ~~public use limit is similar in that it would impose a maximum of 6 dogs per commercial dog walker for the protection of resources and visitor and employee safety, however, it would not limit commercial dog walkers to only seven sites.~~ Rather, all GGNRA sites open to dog walking in San Francisco and Marin would be available for commercial dog walkers under this interim action.

~~As indicated above, this interim restriction and permit requirement would remain in place until the NPS completes the planning and rulemaking processes associated with the dog management planning process. The NPS released the draft plan/SEIS on September 6, 2013; a final plan/EIS is anticipated in 2015 and a final rule in late 2015. The proposed interim restriction does not limit or otherwise affect the range of alternatives that will be considered in the planning process.~~

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Consistency With Applicable Law, and Policy, and Other Plans:

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National Park Service regulations allow superintendents to implement public use limits to protect park resources, equitably allocate use of areas, protect public health and safety, and avoid conflicts among user groups. Public use limits may be adopted following a written determination and publication of the use limitation in the park’s Compendium. Under 36 CFR § 1.6, Permits, the National Park Service may adopt a permit system to implement a public use limit enacted under 36 CFR §1.5.

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This ~~proposed~~ interim ~~restriction-commercial dog use limit~~ is consistent with NPS Management Policies, which allow the issuance of permits for special park uses that provide a benefit to an individual, group or organization rather than the public at large; that require authorization and some degree of management control to protect resources and the public interest, and that are not prohibited by law or regulation. ~~In that~~Since commercial dog walking is not a visitor-serving use, a permit is the proper authorizing mechanism rather than a commercial use authorization which is intended to benefit the visiting public at large. The ~~is interim~~ compendium amendment allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other park users. Use of the most popular dog walking sites in GGNRA is already heavy – additional unregulated use would aggravate issues among dog walkers both commercial and private, as well as impact or displace other users. ~~This interim action is also not inconsistent with the 1979~~ GGNRA 1979 Citizen’s Advisory Commission Pet Policy ~~did not address, as~~ commercial dog walking, ~~and therefore this interim action is also not inconsistent with~~ ~~was not addressed by~~ that policy.

The proposed interim public use limit on commercial dog walkers is not of a nature, magnitude or duration such that it would result in a significant alternation of the public use patterns of the park. The expected duration of this proposed action is approximately two years, when the NPS intends to replace this interim action with a special regulation published in the Code of Federal Regulations that will govern dog walking ~~in GGNRA~~, including commercial dog walking, ~~in GGNRA~~. The scope of this action is also limited. It would only apply to GGNRA lands in San Francisco and Marin counties where dog walking is allowed; GGNRA lands in San Mateo County would not be affected. In addition, this action would only affect commercial dog walkers; private dog walkers would not be affected. Commercial dog walkers are a subset of the dog walking that occurs on GGNRA lands, and only a portion of commercial dog walkers handle more than 6 dogs at one time. More importantly, the proposed action does not ban commercial dog walking. It allows the use to continue, with the requirement of a permit for those with more than 3 dogs and a limit of 6 dogs only in the San Francisco and Marin GGNRA sites that are open to dog walking.

The proposed interim public use limit would not adversely affect the natural, aesthetic or cultural values of park lands in Marin and San Francisco Counties. Because this interim action limits the number of dogs per commercial dog walker, it potentially allows greater control of dogs, particularly in areas where dogs are currently allowed under voice control. Thus, this action ~~would not adversely affect, and~~ may even have a beneficial effect, on natural, aesthetic and cultural values of park lands, by reducing the potential for multiple, large groups of dogs in park sites.

Adoption of the proposed public use limit would not require a long-term or significant modification in the park’s resource management objectives. This proposed public use limit is being adopted on an interim basis and GGNRA anticipates that it would be replaced by a final regulation in approximately two years. The proposed action is also consistent with the park’s resource management objectives ~~and broadly follows since it is consistent with~~ the goals and objectives of the GGNRA dog management draft Plan/EIS and SEIS, both of which considered the park’s resource management objectives in developing the range of alternatives. This action

Comment [EMB6]: Is it? The action is broader than what we propose in the dog plan, in fact, we didn’t want to go beyond the 7 main areas in order to be consistent. It might be better to say that the proposed action is “not inconsistent” with the park’s resource mgmt. objectives and “broadly follows” the goals and objectives of the dog plan...

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is also consistent with natural resource goals of the updated GGNRA General Management Plan, particularly the goal of maintaining the integrity and diversity of natural resources and systems and mitigating the effects of climate change and urban pressures.

The proposed interim restriction is not highly controversial. Multiple jurisdictions in the Bay Area, including the City and County of San Francisco, the City of Tiburon, and Marin County Parks and Open Space, have recognized the need to impose reasonable restrictions on commercial dog walking and have done so; the most recent actions were in July of this year.

The interim use limit proposed here was initially proposed by the ~~commercial dog walking representative to the~~ GGNRA Negotiated Rulemaking Committee, and was further developed with much public input throughout the GGNRA dog management planning effort. ~~This action is similar to the approach that is currently being used in by the adjacent jurisdictions mentioned above.~~

This proposed interim restriction and permit requirement is the minimum necessary action at this time. The action is narrowly tailored to address the anticipated increase in commercial dog walking that is expected to result from the adoption of local ordinances regulating commercial dog walkers in San Francisco and Tiburon. Without this interim action, it is reasonably expected that GGNRA lands in San Francisco and Marin Counties could see an increase in the amount of commercial dog walkers with large groups of dogs, which in turn would affect the use and enjoyment of park lands by other visitors including dog walkers.

Finally, this interim action is not expected to displace commercial dog walkers to adjacent lands managed by other agencies. Both the City of Tiburon and the Marin County Parks and Open Space District already have similar restrictions on commercial dog walking. In San Francisco, there may be some commercial dog walkers who prefer to use City and County of San Francisco lands, in that they would be allowed an additional 2 dogs per walker under the San Francisco permit. However, that difference is not expected to result in a significant amount of displacement from GGNRA lands to San Francisco-managed sites. Finally, there would be no displacement onto Presidio Trust (Trust) lands as a result of this action, in that the Trust is proposing a similar interim restriction on Trust lands, intended to be enacted in concert with the GGNRA interim restriction.

Decision / Implementation Process

This proposal has been released for a 30-day public review and comment period ~~[check calendar for holidays, etc]~~. Following the public comment period, NPS will review all substantive comments received. After considering public comment, the GGNRA Superintendent will make an informed decision on whether or not to implement the proposal. If implementation is approved, GGNRA's Compendium would be amended and the public would be notified through community outreach, outreach to dog walking organizations, brochures and/or signage, and the Park's website.

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GOLDEN GATE NATIONAL RECREATION AREA

**Commercial Dog Walking Public Use Limit and Permit Requirement
Interim Compendium Amendment**

The public is invited to comment on the Golden Gate National Recreation Area (GGNRA) on the following Proposed Action:

Proposed Action: The GGNRA is proposing to require a public use limit and permit requirement on persons who are walking four or more dogs at one time for consideration (commercial dog walker) on lands under the administrative jurisdiction of the National Park Service in Marin County and the City and County of San Francisco, where dog walking is allowed. Permits will allow a maximum of six dogs per dog walker, and require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA. Permit holders must abide by all NPS regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice control dog walking per the 1979 Pet Policy. **The annual permit cost would be a \$75.00 application fee and \$300 per non-transferrable badge.**

Comment [EMB1]: Per what? Per person or per company?

This public use limit would be an interim action. GGNRA intends that it would remain in effect until a final special regulation for dog walking, including commercial dog walking, in GGNRA is promulgated. That final special regulation is anticipated in late 2015. Should the Superintendent of GGNRA decide to approve this interim public use limit and permit system, an amendment to GGNRA's Compendium¹ would be completed.

Need for Proposed Action: (These would be succinct to the point reasons why we need to take action)

Adjacent Jurisdictions: This proposed public use limit and permit requirement is a direct response to commercial dog walking permit programs recently enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which limit the number of dogs per commercial dog walker to 8 or 6 dogs, respectively. Given the extremely broad geographical reach (parks, open spaces, Port of San Francisco lands, and San Francisco Public Utility Commission properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the NPS reasonably anticipates that a number of commercial dog walkers, who would otherwise use the areas subject to these ordinances, will instead walk their dogs in areas under the administrative jurisdiction of the NPS in San Francisco and Marin Counties that are already heavily used by dog walkers, including commercial dog walkers. The San Francisco ordinance on commercial dog walking went into effect July 1, 2013, however, given the 120 day grace period to allow completion of permit training requirements, the effective date of that action is XXXXXXXXXX. As of September 25, 2013, XX commercial dog walking permits had been issued by San Francisco's Animal Care

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¹ GGNRA's Compendium is a listing of all park closures and use limits within the GGNRA.

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and Control. The City of Tiburon’s permit program went into effect July 19, 2013; [as of September 25, 2013, XX permits had been issued by the City of Tiburon.](#)

The San Francisco ordinance is anticipated to have a noticeable impact, particularly at Fort Funston and Crissy Field, the two sites most regularly used by dog walkers. Crissy Field already receives very high visitor use (approximately 3.2 million in 2009), including from individual and commercial dog walkers. GGNRA staff estimate that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays), and typically at least three present, with at least four to eight dogs each, at any given time of the day. A 2011 Visitor Use Study found that 24% of visitors at Crissy Field were dog walkers. That same study found that at Fort Funston, where the average number of dogs walked at the site each day is 1,600, an average of 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends). On weekends, 3.1% of dogs at Fort Funston are walked in groups larger than 6, accounting for 10 dog walker visits. However, on weekdays, 34.7% of dogs were in groups larger than 6, accounting for approximately 127 dog walker visits. Of that group 19.4% of dogs were in groups larger than 8 (approximately 61 dog walker visits). The study notes: “At Fort Funston, many visitors were observed with large groups of dogs. While some of these visitors may be individuals who own multiple dogs, most are likely professional dog walkers.”

Marin County Parks and Open Space began requiring permits for commercial dog walkers on Open Space lands in 2002; the permits allowed a maximum of 6 dogs per walker. Currently, certain GGNRA-managed sites in southern Marin are used by commercial dog walkers with more than six dogs per person; dog walkers with six or more dogs have been seen at both Rodeo Beach and the Alta Trail above Marin City. The Alta Trail, an easily accessible GGNRA site in close proximity to the town of Tiburon, is regularly used by commercial dog walkers who have an average of ten dogs each. GGNRA staff have often experienced up to 50 off-leash dogs at one time on the Alta Trail. Because of the ease of access from Highway 101, availability of on-street parking at the trailhead and proximity to Tiburon, Alta Trail is likely to be an alternative for those commercial dog walkers who would otherwise use Tiburon open space areas where there is now a permit requirement and limit of 6 dogs per walker. Without an interim use limit and permit requirement for commercial dog walking, that use could increase on GGNRA lands in southern Marin, particularly on the Alta Trail which is also popular with private dog walkers, hikers, runners and bicyclists.

Safety and Visitor Experience: In heavily used areas, and areas especially popular with multiple user groups, limiting the number of dogs per dog walker for this interim period would lessen the potential for conflict between user groups by allowing better control by dog walkers. Additionally, a limit on the number of dogs would address the safety and visitor experience concerns of other users, including private dog walkers, who have been displaced from areas heavily used by commercial dog walkers where large groups of dogs are not always well controlled. Numerous comments on the draft Dog Management Plan/EIS and visitor complaints received by park staff have voiced safety and visitor experience concerns about large groups of dogs that are not adequately supervised. Additional control made possible by limiting the number of dogs walked at one time by commercial dog walkers would also address park employee concerns about working outdoors in areas heavily used by commercial dog walkers.

Comment [EMB2]: Are there actual incidents specific to commercial, vs. private dogwalkers?

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Establish Control and Regulations: Research and interviews conducted as part of GGNRA's dog management planning project indicate that there are now at least 100 commercial dog walkers in the City and County of San Francisco, although there are also commercial dog walkers who do not have a business license and are not listed in the phone book. Many of these dog walkers are single individuals (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco (ProDog). In a recent interview about San Francisco's new commercial dog walking ordinance, a spokesperson for ProDog estimated that there might be as many as 300 commercial dog walkers in San Francisco. In San Francisco, the GGNRA sites most often used by commercial dog walkers are Fort Funston, Crissy Field and Fort Mason, but commercial dog walkers are also seen at Baker Beach and Ocean Beach. Commercial dog walkers typically bring between four and ten dogs or more at a time to GGNRA sites and spend about one hour, twice a day, in the park.

Without this interim action, commercial dog walkers would be able to continue walking unlimited number of dogs at GGNRA sites where dog walking is currently allowed until a special regulation for dog walking in GGNRA after the NPS completes the GGNRA dog management planning project. A final rule is not anticipated until 2015.

Additional Background Information:

The maximum number of dogs per commercial dog walker in this proposed interim compendium amendment was drawn from the permit conditions for commercial dog walkers developed in the dog management planning process. The permit conditions - including the number of dogs allowed per dog walker - proposed in the preferred alternative of the draft Dog Management Plan/Environmental Impact Statement (draft plan/EIS) and the just-released draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS), were developed initially by the GGNRA Negotiated Rulemaking Committee for dog management, and further developed in the draft Plan/EIS. During the public comment period on the draft Plan/EIS, the National Park Service (NPS) received multiple comments regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the number at six dogs with strict guidelines. Other commenters, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker, with some noting that four or more dogs could be hard to control. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of dogs to a maximum of six, while other commenters requested that commercial dog walking not be allowed at all.

In proposing alternatives for the maximum number of dogs per walker in the draft plan/EIS, the NPS was concerned first and foremost with visitor experience and safety, as well as resource protection, key objectives of the plan. The NPS questioned whether a dog walker could consistently control more than six dogs in areas open to voice control, of particular concern in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. The NPS was unable to find literature supporting the idea that more than six dogs would not impact visitor experience and safety or damage park resources or, put another way, would provide both visitor experience and safety and resource

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protection. Based on public comment, feedback from the GGNRA Negotiated Rulemaking Committee for dog management, park staff observations, research on national and international best practices and law enforcement experience, the NPS believes that allowing more than six dogs total could negatively impact visitor experience and visitor and employee safety. It should be noted that the commercial dog walker legislation information pamphlet developed by San Francisco's Animal Care and Control states that 8 dogs per walker is the limit, but immediately thereafter notes that 6 dogs per dog walker is recommended. The preferred alternative proposed in GGNRA's draft Plan/EIS and SEIS would require that commercial and private dog walkers with more than three dogs obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites, all of which are in either Marin or San Francisco counties.

This proposed interim public use limit is similar in that it would impose a maximum of 6 dogs per commercial dog walker for the protection of resources and visitor and employee safety, however, it would not limit commercial dog walkers to only seven sites. Rather, all GGNRA sites open to dog walking in San Francisco and Marin would be available for commercial dog walkers under this interim action.

As indicated above, this interim restriction and permit requirement would remain in place until the NPS completes the planning and rulemaking processes associated with the dog management planning process. The NPS released the draft plan/SEIS on September 6, 2013; a final plan/EIS is anticipated in 2015 and a final rule in late 2015. The proposed interim restriction does not limit or otherwise affect the range of alternatives that will be considered in the planning process.

Applicable Law and Policy:

National Park Service regulations allow superintendents to implement public use limits to protect park resources, equitably allocate use of areas, protect public health and safety, and avoid conflicts among user groups. Public use limits may be adopted following a written determination and publication of the use limitation in the park's Compendium. Under 36 CFR § 1.6, Permits, the National Park Service may adopt a permit system to implement a public use limit enacted under 36 CFR §1.5.

This interim restriction is consistent with NPS Management Policies, which allow the issuance of permits for special park uses that provide a benefit to an individual, group or organization rather than the public at large; that require authorization and some degree of management control to protect resources and the public interest and that are not prohibited by law or regulation. In that commercial dog walking is not a visitor-serving use, a permit is the proper authorizing mechanism rather than a commercial use authorization which is intended to benefit the visiting public at large. This interim compendium amendment allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other park users. Use of the most popular dog walking sites in GGNRA is already heavy – additional unregulated use would aggravate issues among dog walkers both commercial and private, as well as impact or displace other users. This interim action is also not inconsistent with the 1979 GGNRA Citizen's Advisory Commission Pet Policy, as commercial dog walking was not addressed by that policy.

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The proposed interim public use limit on commercial dog walkers is not of a nature, magnitude or duration such that it would result in a significant alternation of the public use patterns of the park. The expected duration of this proposed action is approximately two years, when the NPS intends to replace this interim action with a special regulation published in the Code of Federal Regulations that will govern dog walking, including commercial dog walking, in GGNRA. The scope of this action is also limited. It would only apply to GGNRA lands in San Francisco and Marin counties where dog walking is allowed; GGNRA lands in San Mateo County would not be affected. In addition, this action would only affect commercial dog walkers; private dog walkers would not be affected. Commercial dog walkers are a subset of the dog walking that occurs on GGNRA lands, and only a portion of commercial dog walkers handle more than 6 dogs at one time. More importantly, the proposed action does not ban commercial dog walking. It allows the use to continue, with the requirement of a permit for those with more than 3 dogs and a limit of 6 dogs only in the San Francisco and Marin GGNRA sites that are open to dog walking.

The proposed interim public use limit would not adversely affect the natural, aesthetic or cultural values of park lands in Marin and San Francisco Counties. Because this interim action limits the number of dogs per commercial dog walker, it potentially allows greater control of dogs, particularly in areas where dogs are currently allowed under voice control. Thus, this action would not adversely affect, and may even have a beneficial effect, on natural, aesthetic and cultural values of park lands, by reducing the potential for multiple, large groups of dogs in park sites.

Adoption of the proposed public use limit would not require a long-term or significant modification in the park's resource management objectives. This proposed public use limit is being adopted on an interim basis and GGNRA anticipates that it would be replaced by a final regulation in approximately two years. The proposed action is also consistent with the park's resource management objectives since it is consistent with the goals and objectives of the GGNRA dog management draft Plan/EIS and SEIS, both of which considered the park's resource management objectives in developing the range of alternatives. This action is also consistent with natural resource goals of the updated GGNRA General Management Plan, particularly the goal of maintaining the integrity and diversity of natural resources and systems and mitigating the effects of climate change and urban pressures.

Comment [EMB3]: Is it? The action is broader than what we propose in the dog plan, in fact, we didn't want to go beyond the 7 main areas in order to be consistent. It might be better to say that the proposed action is "not inconsistent" with the park's resource mgmt. objectives and "broadly follows" the goals and objectives of the dog plan...

The proposed interim restriction is not highly controversial. Multiple jurisdictions in the Bay Area, including the City and County of San Francisco, the City of Tiburon, and Marin County Parks and Open Space, have recognized the need to impose reasonable restrictions on commercial dog walking and have done so; the most recent actions were in July of this year. The interim use limit proposed here was initially proposed by the commercial dog walking representative to the GGNRA Negotiated Rulemaking Committee, and was further developed with much public input throughout the GGNRA dog management planning effort. This action is similar to the approach that is currently being used ~~in~~ by the adjacent jurisdictions mentioned above.

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This proposed interim restriction and permit requirement is the minimum necessary action at this time. The action is narrowly tailored to address the anticipated increase in commercial dog walking that is expected to result from the adoption of local ordinances regulating commercial dog walkers in San Francisco and Tiburon. Without this interim action, it is reasonably expected that GGNRA lands in San Francisco and Marin Counties could see an increase in the amount of commercial dog walkers with large groups of dogs, which in turn would affect the use and enjoyment of park lands by other visitors including dog walkers.

Finally, this interim action is not expected to displace commercial dog walkers to adjacent lands managed by other agencies. Both the City of Tiburon and the Marin County Parks and Open Space District already have similar restrictions on commercial dog walking. In San Francisco, there may be some commercial dog walkers who prefer to use City and County of San Francisco lands, in that they would be allowed an additional 2 dogs per walker under the San Francisco permit. However, that difference is not expected to result in a significant amount of displacement from GGNRA lands to San Francisco-managed sites. Finally, there would be no displacement onto Presidio Trust (Trust) lands as a result of this action, in that the Trust is proposing a similar interim restriction on Trust lands, intended to be enacted in concert with the GGNRA interim restriction.

Decision / Implementation Process

This proposal has been released for a 30-day public review and comment period. Following the public comment period, NPS will review all substantive comments received. After considering public comment, the GGNRA Superintendent will make an informed decision on whether or not to implement the proposal. If implementation is approved, GGNRA's Compendium would be amended and the public would be notified through community outreach, outreach to dog walking organizations, brochures and/or signage, and the Park's website.

Comment [SO4]: This paragraph would be changed based on decision-making approach is adopted.

Dates:

Comments on this proposal must be received by XXX, XX, 2013.

Addresses:

Comments may be submitted online at [**Comment \[EMB5\]:** Should not be something close to the dog plan.](https://parkplanning.nps.gov/*add shortlink name, or by mail to:</u></p></div><div data-bbox=)

Also, depending on the release date, we need language that clarifies that these public comments have nothing to do with the dog plan/SEIS, which is a separate process.

[Golden Gate National Recreation Area](#)
[Fort Mason, Building 201](#)
[San Francisco, CA 94123](#)
[Attn: Commercial Dog Walking](#)

Questions Regarding the Plan:

Leave a message on the Dog Management Information Line; park staff monitor the line and will respond promptly.

Comment [SO6]: Probably best to give the goga_planning@nps.gov rather than phone line.

Comment [EMB7]: I would instead just list a number. The message will say the rest.

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GOLDEN GATE NATIONAL RECREATION AREA

**Commercial Dog Walking Public Use Limit and Permit Requirement
Interim Compendium Amendment**

The public is invited to comment on the Golden Gate National Recreation Area (GGNRA) on the following Proposed Action:

Proposed Action: The GGNRA is proposing to require a public use limit and permit requirement on persons who are walking four or more dogs at one time for consideration (commercial dog walker) on lands under the administrative jurisdiction of the National Park Service in Marin County and the City and County of San Francisco, where dog walking is allowed. Permits will allow a maximum of six dogs per dog walker, and require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA. Permit holders must abide by all NPS regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice control dog walking per the 1979 Pet Policy. The annual permit cost would be a \$75.00 application fee and \$300 per non-transferrable badge.

This public use limit would be an interim action that would remain in effect until a final special regulation for dog walking, including commercial dog walking, in GGNRA is promulgated. That final special regulation is anticipated in late 2015. Should the GGNRA Superintendent decide to approve this interim public use limit and permit system, an amendment to GGNRA's Compendium¹ would be completed.

Need for Proposed Action

Recent Actions by Adjacent Jurisdictions

This proposed public use limit and permit requirement is a direct response to commercial dog walking permit programs recently enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which limit the number of dogs per commercial dog walker to 8 or 6 dogs, respectively. Given the extremely broad geographical reach (parks, open spaces, Port of San Francisco lands, and San Francisco Public Utility Commission properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the NPS reasonably anticipates that a number of commercial dog walkers, who would otherwise use the areas subject to these ordinances, will instead walk their dogs in areas under the administrative jurisdiction of the NPS in San Francisco and Marin Counties that are already heavily used by dog walkers, including commercial dog walkers.

The San Francisco ordinance on commercial dog walking went into effect July 1, 2013, however, given the 120 day grace period allowed for completion of permit training requirements, the practical effective date of that action is November 1, 2013 . As of November XX, 2013, XX commercial dog walking permits had been issued by San Francisco's Animal

¹ GGNRA's Compendium is a listing of all park closures and use limits within the GGNRA.

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Care and Control. The City of Tiburon’s permit program went into effect July 19, 2013; as of November XX, 2013, XX permits had been issued by the City of Tiburon.

The San Francisco ordinance is anticipated to have a noticeable impact, particularly at Fort Funston and Crissy Field, the two sites most regularly used by dog walkers. Crissy Field already receives very high visitor use (approximately 3.2 million in 2009), including from individual and commercial dog walkers. GGNRA staff estimate that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays), and typically at least three present, with at least four to eight dogs each, at any given time of the day. A 2011 Visitor Use Study found that 24% of visitors at Crissy Field were dog walkers. That same study found that at Fort Funston, where the average number of dogs walked at the site each day is 1,600, an average of 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends). On weekends, 3.1% of dogs at Fort Funston are walked in groups larger than 6, accounting for 10 dog walker visits. However, on weekdays, 34.7% of dogs were in groups larger than 6, accounting for approximately 127 dog walker visits. Of that group 19.4% of dogs were in groups larger than 8 (approximately 61 dog walker visits). The study notes: “At Fort Funston, many visitors were observed with large groups of dogs. While some of these visitors may be individuals who own multiple dogs, most are likely professional dog walkers.”

Comment [SES1]: From 2011 IEC Assessment of Visitor Activities at Six Sites Within Golden Gate National Recreation Area, pg 17; data is from the 2009 Cosco Busan visitor count.

Marin County Parks and Open Space began requiring permits for commercial dog walkers on Open Space lands in 2002; the permits allowed a maximum of 6 dogs per walker. Currently, certain GGNRA-managed sites in southern Marin are used by commercial dog walkers with more than six dogs per person; dog walkers with six or more dogs have been seen at both Rodeo Beach and the Alta Trail above Marin City. The Alta Trail, an easily accessible GGNRA site in relatively close proximity to the town of Tiburon, is regularly used by commercial dog walkers who have an average of ten dogs each. GGNRA staff have often experienced up to 50 off-leash dogs at one time on the Alta Trail. Because of the ease of access and parking, Alta Trail is likely to be an alternative for those commercial dog walkers who would otherwise use Tiburon open space areas where there is now a permit requirement and limit of 6 dogs per walker. Without an interim use limit and permit requirement for commercial dog walking, that use could increase on GGNRA lands in southern Marin, particularly on the Alta Trail which is also popular with private dog walkers, hikers, runners and bicyclists.

Safety and Visitor Experience

In heavily used areas, and areas especially popular with multiple user groups, limiting the number of dogs per dog walker for this interim period would lessen the potential for conflict between user groups by allowing better control by dog walkers. Additionally, a limit on the number of dogs would address the safety and visitor experience concerns of other users, including some private dog walkers, who have been displaced from areas heavily used by commercial dog walkers where large groups of dogs are not always well controlled. Numerous comments on the draft Dog Management Plan/EIS and visitor complaints received by park staff have voiced safety and visitor experience concerns about large groups of dogs that are not adequately supervised. Additional control made possible by limiting the number of dogs walked at one time by commercial dog walkers would also address park employee concerns about working outdoors in areas heavily used by commercial dog walkers.

Comment [EMB2]: Are there actual incidents specific to commercial, vs. private dogwalkers?
SES – in some cases, yes.

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Establish Control and Regulations

Research and interviews conducted as part of GGNRA's dog management planning project indicate that there are now at least 100 commercial dog walkers in the City and County of San Francisco, although there are also commercial dog walkers who do not have a business license and are not listed in the phone book. Many of these dog walkers are single individuals (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco (Prodog). In a July 14, 2013, San Francisco Chronicle interview about the city's new commercial dog walking ordinance, a spokesperson for ProDog noted that there might be as many as 300 commercial dog walkers in San Francisco. In San Francisco, the GGNRA sites most often used by commercial dog walkers are Fort Funston, Crissy Field and Fort Mason, but commercial dog walkers are also seen at Baker Beach and Ocean Beach. Commercial dog walkers typically bring between four and ten dogs or more at a time to GGNRA sites and spend about one hour, twice a day, in the park.

Without this interim action, commercial dog walkers would be able to continue walking unlimited number of dogs at GGNRA sites in San Francisco and Marin where dog walking is currently allowed, until a special regulation for dog walking in GGNRA is promulgated. A final rule is not anticipated until late 2015.

Additional Background Information

The maximum number of dogs per commercial dog walker in this proposed interim action is drawn from the permit conditions for dog walkers, including commercial dog walkers, with more than three dogs, developed in the dog management planning process. The permit conditions - including the number of dogs allowed per dog walker - proposed in the preferred alternative of the draft Dog Management Plan/Environmental Impact Statement (draft plan/EIS) and the just-released draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS), were developed initially by the GGNRA Negotiated Rulemaking Committee for Dog Management, and further developed in the draft Plan/EIS. During the public comment period on the draft Plan/EIS, the National Park Service (NPS) received multiple comments regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the number at six dogs with strict guidelines. Other commenters, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker, with some noting that four or more dogs could be hard to control. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of dogs to a maximum of six, while other commenters requested that commercial dog walking not be allowed at all.

In proposing alternatives for the maximum number of dogs per walker in the draft plan/EIS, the NPS was concerned first and foremost with visitor experience and safety, as well as resource protection, key objectives of the plan. The NPS questioned whether a dog walker could consistently control more than six dogs in areas open to voice control, of particular concern in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. The NPS was unable to find literature supporting the idea that more than six dogs would provide both visitor experience and safety and resource protection. In summary, based on public comment, feedback from the Negotiated Rulemaking

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Committee, park staff observations, research on national and international best practices and law enforcement experience, the NPS believes that allowing more than six dogs total could negatively impact visitor experience and visitor and employee safety.

The preferred alternative proposed in GGNRA's draft Plan/EIS and SEIS would require that commercial and private dog walkers with more than three dogs obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for seven park sites, all of which are in either Marin or San Francisco counties. This proposed interim public use limit is similar in that it would impose a maximum of 6 dogs per commercial dog walker for the protection of resources and visitor and employee safety. However, it would not limit commercial dog walkers to only seven sites; rather, all GGNRA sites open to dog walking in San Francisco and Marin would be available for commercial dog walkers under this interim action.

As indicated above, this interim restriction and permit requirement would remain in place until the NPS completes the dog management planning and rulemaking processes. The NPS released the draft plan/SEIS on September 6, 2013; a final plan/EIS and final rule are anticipated in late 2015. The proposed interim restriction does not limit or otherwise affect the range of alternatives that will be considered in the planning process.

Applicable Law and Policy

National Park Service regulations allow superintendents to implement public use limits to protect park resources, equitably allocate use of areas, protect public health and safety, and avoid conflicts among user groups. Public use limits may be adopted following a written determination and publication of the use limitation in the park's Compendium. Under 36 CFR § 1.6, Permits, the National Park Service may adopt a permit system to implement a public use limit enacted under 36 CFR §1.5.

This proposed interim restriction is consistent with NPS Management Policies, which allow the issuance of permits for special park uses that provide a benefit to an individual, group or organization rather than the public at large; that require authorization and some degree of management control to protect resources and the public interest and that are not prohibited by law or regulation. In that commercial dog walking is not a visitor-serving use, a permit is the proper authorizing mechanism rather than a commercial use authorization, which is intended to benefit the visiting public at large. This interim action allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other park users. Use of the most popular dog walking sites in GGNRA is already heavy – additional unregulated use would aggravate issues among dog walkers both commercial and private, as well as impact or displace other users. The 1979 GGNRA Citizen's Advisory Commission Pet Policy did not address commercial dog walking, thus this interim action is not inconsistent with that policy.

The interim action is not of a nature, magnitude or duration such that it would result in a significant alternation of the public use patterns of the park. The expected duration of this proposed interim action is approximately two years, when the NPS intends to replace it with a

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special regulation published in the Code of Federal Regulations that will govern dog walking, including commercial dog walking, in GGNRA. The scope of this proposed action is limited, applying only to GGNRA lands in San Francisco and Marin counties where dog walking is allowed; GGNRA lands in San Mateo County would not be affected. In addition, this proposed action would only affect commercial dog walkers; private dog walkers would not be affected. Commercial dog walkers are a subset of the dog walking that occurs on GGNRA lands, and only a portion of commercial dog walkers handle more than 6 dogs at one time. More importantly, the proposed action does not ban commercial dog walking. It allows the use to continue, with the requirement of a permit for those with more than 3 dogs, and a limit of 6 dogs, in San Francisco and Marin GGNRA sites.

This proposed interim action would not adversely affect the natural, aesthetic or cultural values of park lands in Marin and San Francisco counties. Because this interim action limits the number of dogs per commercial dog walker, it potentially allows greater control of dogs, particularly in areas where dogs are currently allowed under voice control. Thus, this action would not adversely affect, and may even have a beneficial effect, on natural, aesthetic and cultural values of park lands, by reducing the potential for multiple, large groups of dogs in park sites.

Adoption of the proposed action would not require a long-term or significant modification in the park's resource management objectives since it is an interim action and the park anticipates that it would be replaced by a final regulation in approximately two years. The proposed action is also not inconsistent with the park's resource management objectives and broadly follows the goals and objectives of the GGNRA dog management draft Plan/EIS and SEIS, both of which considered the park's resource management objectives in developing the range of alternatives. This proposed action is also consistent with natural resource goals of the updated GGNRA General Management Plan, particularly the goal of maintaining the integrity and diversity of natural resources and systems and mitigating the effects of climate change and urban pressures.

The proposed interim restriction is not highly controversial. Multiple jurisdictions in the Bay Area, including the City and County of San Francisco, the City of Tiburon, and Marin County Parks and Open Space, have recognized the need to impose reasonable restrictions on commercial dog walking and have done so; the most recent actions were in July of this year. The interim action proposed here was initially proposed by the commercial dog walking representative to the GGNRA Negotiated Rulemaking Committee, and was further developed with much public input throughout the GGNRA dog management planning effort. This action is similar to the approach that is currently being used by the adjacent jurisdictions mentioned above.

This interim proposal is the minimum necessary action at this time; narrowly tailored to address the anticipated increase in commercial dog walking that is expected to result from the adoption of local ordinances regulating commercial dog walkers in San Francisco and Tiburon. Without this interim action, it is reasonably expected that GGNRA lands in San Francisco and Marin Counties could see an increase in the amount of commercial dog walkers with large groups of dogs, which in turn would affect the use and enjoyment of park lands by other visitors, including dog walkers.

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Finally, this interim action is not expected to displace commercial dog walkers to adjacent lands managed by other agencies. Both the City of Tiburon and the Marin County Parks and Open Space District already have similar restrictions on commercial dog walking. In San Francisco, there may be some commercial dog walkers who prefer to use City and County of San Francisco lands, in that they would be allowed an additional 2 dogs per walker under the San Francisco permit. However, that difference is not expected to result in a significant amount of displacement from GGNRA lands to San Francisco-managed sites. Finally, there would be no displacement onto Presidio Trust (Trust) lands as a result of this action, in that the Trust is proposing a similar interim restriction on Trust lands, intended to be enacted in concert with the GGNRA interim restriction.

Decision / Implementation Process

This proposal has been released for a 30-day public review and comment period. Following the public comment period, NPS will review all substantive comments received. After considering public comment, the GGNRA Superintendent will make an informed decision on whether or not to implement the proposal. If implementation is approved, GGNRA's Compendium would be amended and the public would be notified through community outreach, outreach to dog walking organizations, brochures and/or signage, and the Park's website.

Comment [SO3]: This paragraph would be changed based on decision-making approach is adopted.

Dates:

Comments on this proposal must be received by XXX, XX, 2013.

Addresses:

Comments may be submitted online at https://parkplanning.nps.gov/*add shortlink name, or by mail to:

Comment [EMB4]: Should not be something close to the dog plan.

Also, depending on the release date, we need language that clarifies that these public comments have nothing to do with the dog plan/SEIS, which is a separate process.

Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, CA 94123
Attn: Commercial Dog Walking

Questions Regarding the Plan:

Leave a message on the Dog Management Information Line; park staff monitor the line and will respond promptly.

Comment [SO5]: Probably best to give the goga_planning@nps.gov rather than phone line.

Comment [SES6]: Let's discuss; may be easier to respond to difficult questions by voice.

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GOLDEN GATE NATIONAL RECREATION AREA

**Commercial Dog Walking Use Limit and Permit Requirement
Interim Compendium Amendment**

Summary: Golden Gate National Recreation Area (GGNRA) invites the public to comment on a proposal to establish a public use limit and permit requirement for persons who are walking four or more dogs at one time for consideration (commercial dog walker) on National Park Service lands in Marin County and the City and County of San Francisco, where dog walking is allowed.

Permits will allow a maximum of six dogs per dog walker, and require a business license and proof of liability insurance and approved dog-handling training through existing training courses. Permit holders must abide by all NPS regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in length in sites that are not open to voice control dog walking per the 1979 Pet Policy. The annual permit cost would be \$375.00, including a \$75.00 application fee and \$300 per person for a non-transferrable badge.

This use limit would be an interim action. It would remain in effect until a final special regulation for dog walking, including commercial dog walking, in GGNRA is promulgated. That regulation is anticipated in 2015. Should the Superintendent of GGNRA approve this interim public use limit and permit system, an amendment to GGNRA's Compendium¹ would be completed.

Dates:

Comments on this proposal must be received by XXX, XX, 2013.

Addresses:

Comments [on this interim action, a separate action from the GGNRA dog management plan](#), may be submitted online at https://parkplanning.nps.gov/*add shortlink name, or by mail to:

Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, CA 94123
Attn: Commercial Dog Walking

For Further Information: 415-561-4728

Background:

This proposed public use limit and permit requirement is a direct response to commercial dog walking permit programs recently enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County. These permit programs limit the number of dogs per

¹ GGNRA's Compendium is a listing of all park closures and use limits within the GGNRA.

Comment [EMB1]: Should not be something close to the dog plan.

Also, depending on the release date, we need language that clarifies that these public comments have nothing to do with the dog plan/SEIS, which is a separate process.

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commercial dog walker to 8 or 6 dogs, respectively. Given the extremely broad geographical reach (parks, open spaces, Port of San Francisco lands, and San Francisco Public Utility Commission properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the NPS reasonably anticipates that a number of commercial dog walkers who use the areas in San Francisco and Tiburon that would cause them to fall under these ordinances, will instead walk their dogs in NPS areas in San Francisco and Marin Counties that are already heavily used by dog walkers, including commercial dog walkers.

The San Francisco ordinance on commercial dog walking went into effect July 1, 2013, with a 120-day grace period to November 1, 2013, to allow completion of permit training requirements. As of November XX, 2013, XX commercial dog walking permits had been issued by San Francisco's Animal Care and Control. The City of Tiburon's permit program went into effect July 19, 2013; as of November XX, 2013, XX permits had been issued by the City of Tiburon.

Comment [SES2]: To be updated right before we are final.

This proposed use limit and permit requirement would be adopted as an interim measure that will be replaced by a special regulation after the NPS completes the GGNRA dog management planning process, which addresses both commercial and recreational dog walking. Without this interim action, commercial dog walkers would be able to continue walking unlimited number of dogs at GGNRA sites in San Francisco and Marin where dog walking is currently allowed. The dog management plan and its accompanying environmental impact statement (EIS) are well underway. Once the plan and EIS are nearing finalization, the NPS will develop and seek public comment on a rule that codifies the dog management plan's regulatory elements in the Code of Federal Regulations. A final rule is not anticipated until 2015. When that rule is in place, the Interim Commercial Dog Walking Use Limit and Permit Requirement will expire.

In heavily used areas, especially areas popular with multiple user groups, limiting the number of dogs per dog walker for this interim period would lessen the potential for conflict between user groups by allowing better control by dog walkers. Additionally, a limit on the number of dogs would address the safety and visitor experience concerns of other users, including private dog walkers, who have been displaced from areas heavily used by commercial dog walkers where large groups of dogs are not always well controlled. Numerous comments on the draft Dog Management Plan/EIS and visitor complaints received by park staff have voiced safety and visitor experience concerns about large groups of dogs that are not adequately supervised. Additional control made possible by limiting the number of dogs walked at one time by commercial dog walkers would also address park employee concerns about working outdoors in areas heavily used by commercial dog walkers.

Comment [SES3]: This was written to specifically address SF situation. Prefer it to stay in the SF section below (have left it in there).

San Francisco Commercial Dog Walking

Research and interviews conducted as part of GGNRA's dog management planning process indicate that there are now at least 100 commercial dog walkers in the City and County of San Francisco. There are also commercial dog walkers who operate without a business license. These include individual dog walkers (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San

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Francisco (Prodog). In a July 14, 2013, San Francisco Chronicle article about the city’s new commercial dog walking ordinance, a spokesperson for the San Francisco Professional Dog Walkers Association estimated that there might be as many as 300 commercial dog walkers in San Francisco. In San Francisco, the GGNRA sites most often used by commercial dog walkers are Fort Funston, Crissy Field and Fort Mason, but commercial dog walkers also use Baker Beach and Ocean Beach. Commercial dog walkers typically bring between four and ten or more dogs at a time to GGNRA sites, and spend about one hour in the park, twice daily.

The San Francisco ordinance is anticipated to have a noticeable impact on GGNRA’s San Francisco lands, particularly at Fort Funston and Crissy Field. Crissy Field already receives very high visitor use (approximately 3.2 million in 2009 ~~[where did this figure come from? seems high – also use more recent year]~~), including from commercial and non-commercial dog walkers. GGNRA estimates that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays) with at least four to eight dogs each, and typically at least three present at any one time. A 2011 Visitor Use Study ~~[add citation in footnote and/or maybe a link]~~ found that 24% of visitors at Crissy Field were dog walkers.

Comment [SES4]: Came from 2011 IEC Assessment of Visitor Activities at Six Sites Within Golden Gate National Recreation Area; data is from the 2009 Cosco Busan visitor count. See pg 17

Comment [SES5]: Study is not yet on line. Steve – do we footnote these pieces?

That same study found that at Fort Funston, where the average number of dogs walked at the site each day is 1,600, an average of 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends). On weekdays, 34.7% of dogs at Fort Funston were in groups larger than 6, ~~accounting for approximately 127 dog walker visits~~. Of that group, 19.4% of dogs were in groups larger than 8 ~~(approximately 61 dog walker visits)~~. On weekends, only 3.1% of dogs at Fort Funston are walked in groups larger than 6, accounting for 10 dog walker visits. The study notes: “At Fort Funston, many visitors were observed with large groups of dogs. While some of these visitors may be individuals who own multiple dogs, most are likely professional dog walkers.”

In heavily used areas, and areas especially popular with multiple user groups, limiting the number of dogs per dog walker for this interim period would lessen the potential for conflict between user groups by allowing better control by dog walkers. Additionally, a limit on the number of dogs would address the safety and visitor experience concerns of other users, including private dog walkers, who have been displaced from areas heavily used by commercial dog walkers where large groups of dogs are not always well controlled. Numerous comments on the draft Dog Management Plan/EIS and visitor complaints received by park staff have voiced safety and visitor experience concerns about large groups of dogs that are not adequately supervised. Additional control made possible by limiting the number of dogs walked at one time by commercial dog walkers would also address park employee concerns about working outdoors in areas heavily used by commercial dog walkers.

Comment [SES6]: This is what got moved up. Prefer it here.

Marin County Commercial Dog Walking

Marin County Parks and Open Space began requiring commercial dog walking permits in 2002; the permits allow a maximum of 6 dogs per walker. Certain GGNRA-managed sites in southern Marin, particularly Alta Avenue above Marin City, are used by commercial dog walkers with more than six dogs. The Alta Trail, an easily accessible GGNRA site in close proximity to the town of Tiburon, is regularly used by commercial dog walkers who have an average of ten dogs

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each. GGNRA staff have often experienced up to 50 off-leash dogs at one time on the Alta Trail. Because of the ease of access and parking, without an interim use limit and permit requirement, Alta Trail is likely to be an alternative for those commercial dog walkers who would otherwise use Tiburon open space areas where there is now a permit requirement and six dog limit.

How the Proposed Interim Six-Dog Limit and Permit Requirement was Determined

The maximum number of six dogs per commercial dog walker in this proposed interim compendium amendment was drawn from the dog management planning process. The number of dogs allowed per dog walker was proposed initially by the GGNRA Negotiated Rulemaking Committee for Dog Management (2006-2007) and, as one of the Committee's consensus agreements, was incorporated in the preferred alternative of the draft Dog Management Plan/Environmental Impact Statement (draft plan/EIS) released in 2011, and the draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) released in September 2013. During the public comment period on the draft Plan/EIS, the National Park Service (NPS) received multiple comments regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the six dog limit, with strict guidelines. Others, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker. Some commenters noted that four or more dogs could be hard to control. Other commenters requested that commercial dog walking not be allowed at all. Some commercial dog walkers noted potential economic impacts to their businesses of limiting the number of dogs to a maximum of six.

Based on public comment, feedback from the GGNRA Negotiated Rulemaking Committee for dog management, park staff observations, research on national and international best practices and law enforcement experience, the NPS believes that allowing more than six dogs total could negatively impact visitor experience and visitor and employee safety. In proposing alternatives for the maximum number of dogs per walker in the draft plan/EIS, the NPS was concerned first and foremost with visitor experience and safety, as well as resource protection, key objectives of the plan. The NPS questioned whether a dog walker could consistently control more than six dogs in areas open to voice control and was unable to find literature supporting the idea that more than six dogs would provide both visitor experience and safety and resource protection. The preferred alternative proposed in GGNRA's draft Plan/EIS and the draft Plan/SEIS would require that commercial and private dog walkers with more than three dogs obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites.

This proposed interim public use limit is similar in that it would impose a maximum of 6 dogs per commercial dog walker. However, it would not limit commercial dog walkers to only seven sites; all GGNRA sites open to dog walking in San Francisco and Marin would be available for commercial dog walkers under this interim action. As noted previously, this interim restriction and permit requirement would remain in place only until the NPS completes the planning and rulemaking processes associated with the dog management planning process. The NPS released the draft plan/SEIS on September 6, 2013; a final plan/EIS is anticipated in 2015 and a final rule

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in late 2015. The proposed interim restriction does not limit or otherwise affect the range of alternatives that will be considered in the planning process.

Consistency With Applicable Law and Policy

National Park Service regulations allow superintendents to implement public use limits to protect park resources, equitably allocate use of areas, protect public health and safety, and avoid conflicts among user groups. Public use limits may be adopted following a written determination and publication of the use limitation in the park's Compendium. Under 36 CFR § 1.6, Permits, the National Park Service may adopt a permit system to implement a public use limit enacted under 36 CFR §1.5.

This proposed interim commercial use limit is consistent with NPS Management Policies, which allow the issuance of permits for special park uses that provide a benefit to an individual, group or organization rather than the public at large; that require authorization and some degree of management control to protect resources and the public interest, and that are not prohibited by law or regulation. Since commercial dog walking is not a visitor-serving use, a permit is the proper authorizing mechanism rather than a commercial use authorization which is intended to benefit the visiting public at large. This interim action allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other park users. Use of the most popular dog walking sites in GGNRA is already heavy – additional unregulated use would aggravate issues among dog walkers both commercial and private, as well as impact or displace other users. The 1979 GGNRA Citizen's Advisory Commission Pet Policy did not address commercial dog walking, and therefore this interim action is also not inconsistent with that policy.

The proposed interim public use limit on commercial dog walkers is not of a nature, magnitude or duration such that it would result in a significant alternation of the public use patterns of the park. The expected duration of this proposed action is approximately two years, when the NPS intends to replace this interim action with a special regulation published in the Code of Federal Regulations that will govern dog walking, including commercial dog walking, in GGNRA. The scope of this action is also limited. It would only apply to GGNRA lands in San Francisco and Marin counties where dog walking is allowed; GGNRA lands in San Mateo County would not be affected. In addition, this action would only affect commercial dog walkers; private dog walkers would not be affected. Commercial dog walkers are a subset of dog walkers that occurs on GGNRA lands, and only a portion of commercial dog walkers handle more than 6 dogs at one time. More importantly, the proposed action does not ban commercial dog walking. It allows the use to continue, with the requirement of a permit for those with more than 3 dogs and a limit of 6 dogs only in the San Francisco and Marin GGNRA sites that are open to dog walking.

[The proposed interim public use limit would not adversely affect the natural, aesthetic or cultural values of park lands in Marin and San Francisco Counties. Because this interim action limits the number of dogs per commercial dog walker, it potentially allows greater control of dogs, particularly in areas where dogs are currently allowed under voice control. Thus, this action may even have a beneficial effect, on natural, aesthetic and cultural values of park lands, by reducing the potential for multiple, large groups of dogs in park sites.

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Adoption of the proposed public use limit would not require a long-term or significant modification in the park's resource management objectives. This proposed public use limit is being adopted on an interim basis and GGNRA anticipates that it would be replaced by a final regulation in approximately two years. The proposed action is also not inconsistent with the park's resource management objectives and broadly follows the goals and objectives of the GGNRA dog management draft Plan/EIS and SEIS, both of which considered the park's resource management objectives in developing the range of alternatives. This action is also consistent with natural resource goals of the updated GGNRA General Management Plan, particularly the goal of maintaining the integrity and diversity of natural resources and systems and mitigating the effects of climate change and urban pressures.

The proposed interim restriction is not highly controversial. Multiple jurisdictions in the Bay Area, including the City and County of San Francisco, the City of Tiburon, and Marin County Parks and Open Space, have recognized the need to impose reasonable restrictions on commercial dog walking and have done so; the most recent actions were in July of this year. The interim use limit proposed here was initially proposed by the GGNRA Negotiated Rulemaking Committee, and was further developed with much public input throughout the GGNRA dog management planning effort. This action is similar to the approach that is currently being used in by the adjacent jurisdictions mentioned above.

This proposed interim restriction and permit requirement is the minimum necessary action at this time. The action is narrowly tailored to address the anticipated increase in commercial dog walking that is expected to result from the adoption of local ordinances regulating commercial dog walkers in San Francisco and Tiburon. Without this interim action, it is reasonably expected that GGNRA lands in San Francisco and Marin Counties could see an increase in the amount of commercial dog walkers with large groups of dogs, which in turn would affect the use and enjoyment of park lands by other visitors including dog walkers.

Finally, this interim action is not expected to displace commercial dog walkers to adjacent lands managed by other agencies. Both the City of Tiburon and the Marin County Parks and Open Space District already have similar restrictions on commercial dog walking. In San Francisco, there may be some commercial dog walkers who prefer to use City and County of San Francisco lands, in that they would be allowed an additional 2 dogs per walker under the San Francisco permit. However, that difference is not expected to result in a significant amount of displacement from GGNRA lands to San Francisco-managed sites. Finally, there would be no displacement onto Presidio Trust (Trust) lands as a result of this action, in that the Trust is proposing a similar interim restriction on Trust lands, intended to be enacted in concert with the GGNRA interim restriction.

Decision / Implementation Process

This proposal has been released for a 30-day public review and comment period. Following the public comment period, NPS will review all substantive comments received. After considering public comment, the GGNRA Superintendent will make an informed decision on whether or not to implement the proposal. If implementation is approved, GGNRA's Compendium would be

Comment [SES7]: We need to be sure 30 days won't end on a holiday!

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amended and the public would be notified through community outreach, outreach to dog walking organizations, brochures and/or signage, and the Park’s website.

DRAFT

Golden Gate National Recreation Area Categorical Exclusion Form

Project: Commercial Dog Walking Interim Permit Requirement

PEPC Project No. 46523

Project Description: Compendium of designations closures, public use limits, and other restrictions are imposed under discretionary authority by the General Superintendent, Golden Gate National Recreation Area.

In accordance with the delegated authority provided in Section 5.3 of Title 36 of the Code of Federal Regulations, as authorized by Section 3 of Title 16 of the United States Code, the following interim compendium amendment is established for the proper management, protection, and use of the Marin and San Francisco sites open to dog walking that are under the jurisdiction of the National Park Service, Golden Gate National Recreation Area. The public will be notified of this restriction in accordance with the requirements of Section 1.7 of Title 36 of the Code of Federal Regulations.

Under authority of Title 36, Code of Federal Regulations, Section 5.3 the following interim compendium amendment is established:

Anyone walking a dog for consideration (commercial dog walker) wanting to walk more than 3 dogs at one time in any Marin or San Francisco site of Golden Gate National Recreation Area where dog walking is allowed, must first obtain a permit from the park. The maximum number of dogs allowed to be walked per person is 6 at one time.

Permits will require a business license, liability insurance and proof of approved dog-handling training through existing training courses offered by organizations such as Marin Humane or SFSPCA.

Permit holders must abide by all NPS regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice control dog walking per the 1979 Pet Policy.

This interim Compendium amendment is needed to respond to commercial dog walking permit programs enacted by both the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which will take effect July 2013. Together, those actions, limiting the number of dogs commercial dog walkers may walk at one time to 8 or 6 dogs, respectively, are expected to displace commercial dog walkers from San Francisco and Tiburon sites to Golden Gate National Recreation Area (GGNRA) sites in San Francisco and Marin, where commercial dog walking is not yet regulated.

Compliance Determination:

This project is an action that has been determined to result in no measurable adverse environmental effects (see attached Environmental Screening Form). It is therefore categorically excluded from further National Environmental Policy Act analysis under Categorical Exclusion D.O. 12 Section 3.4:

A(5) - "Issuances, extensions, renewals, reissuances or minor modifications of concession contracts or permits not entailing new construction or new environmental impact as a result of concession operations."

Public or Agency Involvement:

Per 36 CFR 1.7, the NPS will notify the public through community outreach, outreach to dog walking organizations, brochures and the Park's website.

Decision:

On the basis of the environmental impact information in the compliance file, with which I am familiar, I am categorically excluding the described project from further NEPA analysis. No exceptional circumstances or conditions in Section 3-6 apply, and the action is fully described in Section 3.4 of DO-12.

Frank Dean
General Superintendent
Golden Gate National Recreation Area

Date

Golden Gate National Recreation Area Categorical Exclusion Form

Project: Commercial Dog Walking Interim Permit Requirement

PEPC Project No. 46523

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Frank Dean
General Superintendent
Golden Gate National Recreation Area

Date



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

L76 (GOGA-PLAN)

DATE

Federated Indians of Graton Rancheria
[ADDRESS] _____

Comment [s1]: Need to add address for each tribal government (14 on list from Stephen Haller)

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental Environmental Impact Statement

Dear XXX:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives.

Executive Order 13175, Federal regulations (36 CFR 800.2) implementing Section 106 of the National Historic Preservation Act of 1966, as amended, and NPS Management Policies all require consultation with federally recognized American Indian tribes on a government-to-government basis. In our continuing effort to involve you in this planning effort, I am writing to update you about this project and to inquire if **the Federated Indians of Graton Rancheria** desire to consult with the NPS regarding the proposed project. Staff at GGNRA are available to discuss the project with you in more detail if necessary. We are making similar inquiries to the Ohlone Representatives and the State Historic Preservation Officer (SHPO), in which you were copied.

This draft plan/SEIS is needed because GGNRA resources and values, as defined by the park's enabling legislation and the NPS Organic Act, could be compromised to the extent that, without action, those resources and values in some areas of the park might not be available for enjoyment by future generations. Additionally, a dog management policy inconsistent with NPS regulations and increased public expectations for use of the park for dog recreation have resulted in controversy, litigation, and compromised visitor and NPS employee safety, affecting visitor experience and resulting in resource degradation. The conflicts will likely continue to escalate if not addressed in a comprehensive plan/SEIS.

The purpose of the draft plan/SEIS is to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the Golden Gate National Recreation Area (GGNRA). The draft plan/SEIS describes six alternatives at 22 sites, including the preferred alternative (alternative F),

for the management of dog walking activities at GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The selection of sites addressed was determined by NPS managers, and was based on information from historical and current dog management practices within GGNRA, including the 1979 Pet Policy; NPS law, policy, and regulations; park resources; visitor experience; consultation with tribes and federal and state agencies; and the Federal Panel Recommendations on Dog Walking to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. However, the plan/SEIS only addresses lands that are directly managed by GGNRA and certain additional lands that will be directly managed by the park in the near future. The 22 sites under consideration for this plan/SEIS and the project area are shown in the attached Figure 1.

The objectives of the Plan/SEIS include:

- Preserve and protect natural and cultural resources and natural processes
- Provide a variety of visitor experiences
- Improve visitor and employee safety
- Reduce user conflicts
- Maintain park resources and values for future generations

If the Federated Indians of Graton Rancheria wish to consult with the NPS regarding this project, please write to the address above or contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your consideration.

Sincerely,

Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer

Attachment:
Figure 1 – Vicinity Map



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

L76 (GOGA-PLAN)

DATE

Ohlone Representatives

[ADDRESS] _____

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Executive Order 13175, Federal regulations (36 CFR 800.2) implementing Section 106 of the National Historic Preservation Act of 1966, as amended, and NPS Management Policies all require consultation with federally recognized American Indian tribes on a government-to-government basis, while NPS Management Policies also require consultation with other traditionally associated groups. In our continuing effort to involve you in this planning effort, I am writing to update you regarding this project and to inquire if the Ohlone Representatives desire to consult with the NPS regarding the proposed project. Staff at GGNRA are available to discuss the project with you in more detail if necessary. We are making similar inquiries to the Federated Indians of Graton Rancheria and the State Historic Preservation Officer (SHPO), in which you were copied.

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Sincerely,

Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer

Attachment:

Figure 1 – Vicinity Map

"Golden Gate National Recreation Area Dog Management"
Modification # 4 to Task Order #4
 Revised Estimated Budget (12-04-06)

| LABOR COSTS | U.S. Institute | Center for Collaborative Policy & Harty Conflict Consulting and | | | Task Subtotals | | |
|---|------------------------|---|---------------------|-------------|----------------|------------|----------------------|
| | Senior Program Manager | Senior Mediator | Senior Mediator 1 | Co-Mediator | Support Staff | Hours | Cost |
| Work Completed Through October 2006 | | | | | | | |
| PHASE 0 - Third Party Neutral Contractor Selection and Project Management | | | | | | | |
| PHASE I - Situation Assessment and Preliminary Process Design; Evaluate Contractor Performance To Date | | | | | | | |
| Evaluate Contractor Performance To Date | | | | | | | |
| PHASE II - Develop Work Plan, Refine Process Design, Plan for Negotiated Rulemaking Process, Convene Negotiated Rulemaking Committee, Conduct Collaboration Skills Workshop | | | | | | | |
| PHASE III-1 - Plan, Coordinate, Facilitate, Document, and Follow-Up Plenary Meetings of Negotiated Rulemaking Committee (1-5) | | | | | | | |
| PHASE III-2 - Plan, Facilitate, Document and Follow-up Subcommittee Meetings of Negotiated Rulemaking Committee (1 & 2) | | | | | | | |
| PHASE III-3 - Mediation of Targeted Issues (through October 2006) | | | | | | | |
| PHASE IV-1 - Attend Public Meetings of NEPA process, including travel | | | | | | | |
| TOTAL WORK COMPLETED THROUGH OCTOBER 2006 | \$ 36,991.35 | \$ 176,587.90 | \$ 57,567.78 | | | | \$ 271,147.03 |
| Tasks To Be Completed November 2006 - September 2007 | | | | | | | |
| PHASE 0 - Third Party Neutral Contractor Selection and Project Management | | | | | | | |
| 0-7 Project management | 48 | | | | | 48 | \$ 6,960.00 |
| 07a Travel (2 trips to San Francisco) | 12 | | | | | 12 | \$ 1,740.00 |
| PHASE 0 LABOR SUBTOTAL | 60 | | | | | 60 | \$ 8,700.00 |
| PHASE III - Plan, Coordinate, Facilitate, Document, and Follow-Up Ten (10) Negotiated Rulemaking Committee Meetings | | | | | | | |
| III-1.6 Plan, facilitate, document, follow-up plenary meeting #6 (Jan 07) | | 28 | 28 | 18 | 12 | 86 | \$ 13,116.00 |
| III-1.7 Plan, facilitate, document, follow up plenary meeting #7 (Mar 07) | | 28 | 28 | 18 | 12 | 86 | \$ 13,116.00 |
| III-1.8 Plan, facilitate, document, follow up plenary meeting #8 (Apr 07) | | 28 | 28 | 18 | 12 | 86 | \$ 13,116.00 |
| III-1.9 Plan, facilitate, document, follow up plenary meeting #9 (May 07) | | 28 | 28 | 18 | 12 | 86 | \$ 13,116.00 |
| III-1.10 Plan, facilitate, document, follow up plenary meeting #10 (Sept. 07) | | 28 | 28 | 18 | 12 | 86 | \$ 13,116.00 |
| PHASE III-1 LABOR SUBTOTAL | 0 | 140 | 140 | 90 | 60 | 430 | \$ 65,580.00 |
| III-2 Plan, facilitate, document, and follow-up six (6) subcommittee meetings of Negotiated Rulemaking Committee | | | | | | | |
| III-2.3 Plan, facilitate, document, follow-up subcommittee meeting #3 (Nov 06) | | 28 | 28 | 18 | 12 | 86 | \$ 13,116.00 |
| III-2.4 Plan, facilitate, document, follow-up subcommittee meeting #4 (Nov 06) | | 28 | 28 | 18 | 12 | 86 | \$ 13,116.00 |
| III-2.5 Plan, facilitate, document, follow-up subcommittee meeting #5 (Feb 07) | | 28 | 28 | 18 | 12 | 86 | \$ 13,116.00 |
| III-2.6 Plan, facilitate, document, follow-up subcommittee meeting #6 (Mar 07) | | 28 | 28 | 18 | 12 | 86 | \$ 13,116.00 |
| PHASE III-2 LABOR SUBTOTAL | 0 | 112 | 112 | 72 | 48 | 344 | \$ 52,464.00 |
| III-3a Mediation of Select Targeted Issues (October 2006 through project end) | 6 | 22 | 22 | | | 50 | \$ 8,790.00 |
| III-4 Facilitate Agreement on Final Set of Recommendations for Proposed Rule | 0 | 16 | 16 | | | 32 | \$ 5,760.00 |
| PHASE III LABOR SUBTOTAL | 6 | 290 | 290 | 162 | 108 | 856 | \$ 132,594.00 |



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

L76 (GOGA-PLAN)

DATE

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer
Office of Historic Preservation, Department of Parks and Recreation
1725 23rd Street, Suite 100
Sacramento, California 95816

Subject: Section 106 Consultation for the Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan / Supplemental Environmental Impact Statement

Dear Mr. Donaldson:

The purpose of this letter is to inform you that a supplemental EIS (SEIS) has been prepared for Dog Management Plan to fully incorporate public comment received on the draft plan/EIS. The National Park Service (NPS) is continuing National Historic Preservation Act (NHPA) Section 106 consultation under 36 CFR for this draft plan/SEIS and is seeking your concurrence with a final finding of effect. We are also consulting directly with the Indians of Graton Rancheria and the Ohlone Representatives.

A letter was sent to your agency, the Indians of Graton Rancheria, and the Ohlone Representatives, in January 2011, along with a copy of the draft GGNRA Dog Management Plan /Environmental Impact Statement (draft plan/EIS). We did not receive comments back from the tribes. Your response requested that GGNRA account for potential effects to unanticipated historic properties and the treatment of such properties. In response we have added a natural and cultural resource monitoring component to the Monitoring Based Management Plan, described below, which will allow a timely NPS response to any unanticipated effects, including mitigation measures and closures, if necessary.

Release of the draft plan/SEIS gives the NPS the opportunity to receive comment from the public on this new information before issuing a Notice of Proposed Rulemaking, the final plan/EIS and record of decision, and final rule.

To address substantive public comments on the draft plan/EIS, the NPS incorporated a number of changes to the draft plan/SEIS, including the following:

- The addition of new data (including additional law enforcement and visitor use data).
- The incorporation of new references.
- Additional *Americans with Disabilities Act* (ADA) information.

- Changes to the impacts analysis (including additional analysis of potential redistributive effects of opening/closing areas to dog walking).
- Changes to the compliance-based management strategy (now referred to as the monitoring-based management strategy) by including natural and cultural resource monitoring and removing automatic triggers and restrictions (see below).
- Evaluation of additional fencing as a method to minimize dog walking impacts.
- Relatively minor changes to each site specific preferred alternative.
- A site recently transferred to GGNRA, Rancho Corral de Tierra (Rancho), was added to the park sites specifically addressed by the plan and a range of reasonable alternatives for the site was developed and is analyzed in this draft plan/SEIS.
- A description of how unanticipated historic properties would be protected.

The monitoring-based management strategy (MMS) (formerly the Compliance-Based Management Strategy) has been designed to encourage compliance with sections of the Code of Federal Regulations (CFR) applicable to dog management, and ensure protection of park resources, visitors and staff. The MMS will provide the framework for monitoring and recording observed noncompliance with the applicable sections of the CFR, including the new 36 CFR Part 7 special regulation for dog management, and will guide use of park resources to address those violations. Noncompliance with federal regulations related to dog management will be met with a range of management responses. The monitoring-based management strategy has been changed from the draft plan/EIS to remove a strict threshold for compliance that would trigger a change to more restrictive management. Monitoring of natural and cultural resources, not just compliance with existing regulations, is a new requirement. This change will allow the NPS to weigh violations within the context of an area. For example, potential effects to unanticipated historic properties and their treatment would be a high priority for management to address. This information will guide the park in the future if additional restrictions become necessary. Law enforcement will continue to issue citations for individual violations. Additionally, monitoring data will provide law enforcement with information on where to prioritize these efforts.

The draft plan/SEIS describes six alternatives at 22 sites (Figure 1), including the preferred alternative (alternative F), for the management of dog walking activities at GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. Alternative F is the preferred alternative, and was altered in part in response to public comments received on the draft plan/EIS. Alternative F provides a variety of visitor use (no dogs, on-leash dog walking, and dog walking under voice and sight control in ROLAs) as well as protection of natural resources, cultural resources, and visitor safety. We have concluded that the preferred alternative would have *no adverse effect* on cultural resources at any of the GGNRA sites, as described briefly below.

ARCHEOLOGICAL RESOURCES

Muir Beach and Lands End. Under the preferred alternative, only on-leash dog walking would be allowed on beaches and designated trails within the general areas where the Muir Beach (CA-MRN-333) and Lands End Point Lobos (CA-SFR-5; CA-SFR-21) archeological sites are located. As none of the three analyzed archeological sites is located within or close to where dog walking is allowed at Muir Beach and Lands End, they are not expected to incur any dog-related impacts. Additionally, these three archeological sites are considered relatively stable and their conditions are monitored periodically by park staff. Under this alternative, these on-leash requirements provide

considerable protection from adverse dog-related activity at these cultural resources and result in a negligible impact to the park's archeological resources. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

HISTORIC STRUCTURES

Permanent Seacoast Fortifications and Their Integral Earthworks (Fort Mason, Fort Point, Fort Miley, Fort Baker, Fort Funston). Under the preferred alternative, dog walking would be allowed near areas of sensitive earthwork portions of seacoast fortifications, including the Fort Mason Historic District and Fort Point (Presidio NHL). However, only on-leash dog walking would be allowed at Fort Point and in the majority of Fort Mason under the preferred alternative. The Fort Mason Historic District contains some large common areas (Great Meadow and parade ground), trails and parking lots. These on-leash areas do not include direct access to the earthwork portions of the seacoast fortifications. Under the preferred alternative, a ROLA is proposed at Fort Mason on the Laguna Green near the southwestern boundary, but either fencing or a vegetative barrier would be installed at the ROLA. On-leash dog walking is also proposed in general areas where seacoast fortifications and their integral earthworks are located at Fort Miley Military Reservation, Fort Baker (Forts Baker, Barry, and Cronkhite Historic District), and Fort Funston. The Fort Miley area includes a trail and picnic and parking areas but does not include direct access to the earthwork portions of seacoast fortifications. On-leash dog walking is proposed along trails and on the parade ground at Fort Baker, none of which offer direct access to seacoast fortifications in the area although one section of trail, the Battery Yates Loop Road, is adjacent to a battery. On-leash walking in the Fort Funston area is restricted to on-leash trails or ROLAs, all of which restrict access to cultural resources at Battery Davis. Fort Funston, which includes Battery Davis, was removed from the NRHP in 2006 due to resource degradation related to erosion and human use to the point where the site lacked integrity. However, Battery Davis was singled out for eventual inclusion in a National Historical Landmark District for seacoast fortifications of San Francisco Bay. The nomination is currently being prepared. The proposals under the preferred alternative (on-leash, ROLAs located away from sensitive resources, fencing/barrier proposed at the Fort Mason ROLA, etc.) for Forts Mason, Point, Miley, Baker, and Funston would provide an added level of protection to these fragile resources by reducing the potential for dog-related trampling and ground disturbance. Under the preferred alternative, negligible to beneficial impacts to the park's historic structures would occur. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

Crissy Airfield. A ROLA is proposed for the eastern portion of Crissy Airfield under the preferred alternative. Currently, dogs under voice control are allowed at Crissy Airfield with no apparent signs of impacts. A 1921 signal cable hut (building 946) near the airfield is currently partially buried and fenced-off and appears unaffected by dog activity. It is expected that with the prohibitions of dogs under voice control in many areas of the park, ROLAs (including at Crissy Field) would become more heavily used by visitors looking for areas to run dogs under voice and sight control. Over time, the actions proposed under the preferred alternative at Crissy Airfield (ROLA) are expected to result in negligible to long-term, minor, site-specific, adverse impacts to cultural resources

related to trampling and ground disturbance. For purposes of Section 106 of the NHPA, the assessment would be *no adverse effect*.

CULTURAL LANDSCAPES

Fort Mason Historic District. Cultural resources located within the Fort Mason Historic District that contribute to its significance and could be affected by dog management actions include earthwork portions of seacoast fortifications (Burnham, Black Point). Under the preferred alternative, only on-leash dog walking would be allowed in parking and common areas (sidewalks, Great Meadow, etc.). A ROLA is proposed at Fort Mason on the Laguna Green, but either fencing or a vegetative barrier would be installed. The restriction of on-leash dog walking for the majority of Fort Mason and the fencing/barrier proposed at the ROLA would minimize the potential for dog-related trampling and ground disturbance to these cultural resources and would result in a negligible impact to the Historic District. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

Forts Baker, Barry and Cronkhite Historic District. Cultural resources that contribute to the NRHP status of the Forts Baker, Barry, and Cronkhite Historic District and which could be affected by dog management actions include earthwork portions of seacoast fortifications (as described above) at Fort Baker and field fortifications. Negligible to beneficial impacts to the earthwork portions of seacoast fortifications are expected; for Section 106, the assessment is *no adverse effect* (see Historic Structures analysis above).

Field Fortifications. Under the preferred alternative, dogs would be prohibited from all Marin Headland trails in the area where the majority of the fragile field fortifications are located. Eliminating dog activity from this area is considered a positive step in the preservation of these resources related to the decreased potential for ground disturbance resulting in a localized benefit to the park's cultural resources. For purposes of Section 106 of the NHPA, the assessment would be *no adverse effect*. Under the preferred alternative, on-leash dog walking would be allowed at Fort Baker on-trail and on the parade ground (away from the earthwork portions of seacoast fortifications) (see Historic Structures analysis above); dogs would be prohibited from the areas of the Marin Headlands where fragile field fortifications are located. Collectively this would prevent dog-related trampling and ground disturbance to these fragile resources resulting in negligible to beneficial impacts to the Forts Baker, Barry, and Cronkhite Historic District. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

Presidio of San Francisco NHL. The NRHP status of the Presidio NHL is related to its numerous contributing historic, architectural and archeological resources associated with important events in American history. Contributing cultural resources located within the Presidio NHL that would be affected by the plan include field fortifications (Fort Scott), the U.S. Coast Guard Station (USCGS) Historic District, earthwork portions of seacoast fortifications, and Crissy Airfield. Negligible to beneficial impacts to earthwork portions of seacoast fortifications, and negligible to long-term, minor adverse impacts to Crissy Airfield are expected under the preferred alternative; for Section 106, the assessment would be *no adverse effect* (see Historic Structures analysis above).

Field Fortifications. These fragile resources are located primarily along a coastal area from Baker Beach north to the Golden Gate Bridge within Fort Scott. Under the preferred alternative, dog walking on-leash would only be allowed along the beach, many trails, and the picnic area and parking lots at Baker Beach; dogs would be prohibited on the Batteries to Bluffs and Battery Crosby Trails. This area is one of high cultural sensitivity with numerous field fortifications present, particularly in the vicinity of Batteries Chamberlin, Crosby and Godfrey (Martini n.d.a.). The field fortifications have been constructed in sandy/unstable soils and are considered fragile. As a result, ground disturbance can result in erosion and negative impacts to these resources. Restricting dogs to on-leash near Battery Chamberlin and prohibiting dogs on the Batteries to Bluffs and Battery Crosby Trails would minimize the potential for trampling and ground disturbance in areas on/around cultural resources resulting in a benefit to the park's cultural resources. For purposes of Section 106 of the NHPA, the assessment would be *no adverse effect*.

U.S. Coast Guard Station Historic District. Under this alternative, on leash dog walking would be allowed along the promenade (Crissy Field) on the southern border of the Historic District and on the lawns and paved public road adjacent to the old Coast Guard buildings. Vegetation that helps to define the original formal design and the edges of the property has been negatively affected in the past by dogs (urination killing vegetation), many of which are dogs under voice control. On-leash requirements under the preferred alternative are expected to result in a negligible impact to the historic district. For purposes of Section 106 of the NHPA, the assessment would be *no adverse effect*.

Fort Miley Military Reservation. Cultural resources located within the Fort Miley Military Reservation that contribute to its significance and could be affected by dog management actions include earthwork portions of seacoast fortifications (Batteries Chester, Livingston-Springer, BC #243). Under the preferred alternative, on-leash dog walking is proposed only along a trail on the east side of the military reservation. The overall impacts to the larger Fort Miley Military Reservation would be negligible. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

Rancho Corral de Tierra. This site may be potentially eligible for listing on the NRHP for ties to the history of ranching operations dating back to the Mexican rancho era. This site includes landscapes features, structures, and archeological sites, including the Francisco Guerrero Adobe Site, and the Martini Creek Ohlone sites (NPS 2011b, 105). The continued requirement of on-leash dog walking to trails in two specific areas of this site would result in a negligible impact to these resources. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

At this point in time, we are seeking your concurrence with a final finding of effect. If you have any questions regarding this request please contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your consideration.

Sincerely,

Frank Dean
General Superintendent,
Golden Gate National Recreation Area

CC:
Advisory Council on Historic Preservation
Federated Indians of Graton Rancheria
Ohlone Representatives

Attachment:
Figure 1 – Vicinity Map

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:
W34 (GOGA-SUPT)

Memorandum

To: General Superintendent, Golden Gate National Recreation Area

From: Shirwin Smith, Management Assistant
Kevin Cochary, Chief Ranger

Subject: Interim Compendium Amendment for Commercial Dog Walking

Summary:

We recommend that you exercise the discretionary authority delegated to you under 36 C.F.R. Section 5.3 to adopt an interim Compendium amendment that would require that any person walking three or more dogs at one time for consideration (commercial dog walker) in any Marin or San Francisco site of Golden Gate National Recreation Area (GGNRA) where dog walking is allowed, must first obtain a permit from the park. This action is a direct response to commercial dog walking permit programs enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which will be in effect July, 2013, and which will limit the number of dogs per dog walker to 8 or 6 dogs, respectively.

Although the GGNRA dog management planning project which addresses commercial dog walking is well underway, a final rule is not anticipated until 2015. In the absence of that final rule, commercial dog walkers are not regulated and thus may walk an unlimited number of dogs at GGNRA park sites where dog walking is currently allowed.

Recommended Regulatory Action

We recommend that you approve an interim, limited compendium amendment to respond to commercial dog walking permit programs enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which will be in effect July, 2013, and which will limit the number of dogs per dog walker to 8 or 6 dogs, respectively. Given the extremely broad geographical reach (parks, open spaces, Port lands, and PUC properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the NPS reasonably anticipates that a ~~ertain~~ number of commercial dog walkers, who would otherwise use areas that would cause them to fall

under these ordinances, will instead walk their dogs in areas under the administrative jurisdiction of the NPS in San Francisco and Marin Counties. Commercial dog walking is not yet regulated in NPS areas in San Francisco and Marin, thus commercial dog walkers using NPS sites could avoid the permit fees, requirements, and limit on the number of dogs they may walk on San Francisco and Tiburon lands covered by the new local ordinances.

Comment [EMB1]: Need to address fact that this already occurs, but that we are expecting a greater influx than normal. Otherwise, why taking action now if there is no change from the status quo?

Comment [SES2]: Doesn't already occur in SF – no regs on commercial dog walkers yet. Does occur in Marin, mostly at Alta

The proposed text of the Compendium amendment is as follows:

Any person walking three or more dogs at one time for consideration (commercial dog walker) in any site under the administrative jurisdiction of GGNRA within the City and County of San Francisco or Marin County, where dog walking is allowed, must first obtain a permit from the park.

- Permits will allow a maximum number of six dogs per dog walker.
- Permits will require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA
- Permit holders must abide by all NPS regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice control dog walking per the 1979 Pet Policy.

Comment [EMB3]: List those sites here?

If approved, this Compendium amendment would remain in effect until the final special regulation for dog walking in GGNRA is promulgated in 2015.

Justification

The San Francisco Board of Supervisors passed an ordinance in February 2012 that requires all commercial dog walkers in San Francisco city parks (including some lands managed by the Port of San Francisco and by the San Francisco Public Utilities Commission) to obtain a permit for that use. The San Francisco permit program will require proof of a business license, insurance and training, and will limit the number of dogs per dog walker to eight.

The Town of Tiburon in Marin County is in the process of enacting a permit program for commercial dog walkers on open space lands managed by the town; those permits will also require proof of business license, insurance and training, and will limit the number of dogs per walker to six, the same limit that has existed on Marin County Open Space lands since 2002.

Comment [EMB4]: If this is the same as Marin, which has been in place since 2002, why didn't we enact an interim compendium change for Marin earlier? Need to explain this discrepancy.

Correction to that last comment – you do explain this below, but suggest moving this portion of the sentence to that section below so that the reader can see that it has a history, AND immediately after why you are taking action now.

Both the San Francisco and Tiburon permit programs are expected to be in place by July 2013. After that, GGNRA San Francisco and Marin sites that allow dog walking will be the only open space lands in those two counties with unregulated commercial dog walking.

Comment [EMB5]: Frank made is sound as if he wants this in place sooner. I recommend letting the city and county take action first, then implementing ours in response. Plus, the SEIS should be published first so that the language we used there is accurate.

Comment [SES6]: We agree

Commercial dog walkers have been using GGNRA's San Francisco and Marin sites for at least ten years. During that time, the GGNRA dog management planning process had already begun, and the decision as to whether commercial dog walking ~~was an appropriate use that~~ should be permitted on GGNRA lands was deferred to the dog management planning process and its accompanying NEPA analysis and rulemaking. Over the past ten years, the number of commercial dog walkers in San Francisco and Marin has increased. Research and interviews for the draft dog management plan/EIS indicate that there are at least 100 commercial dog walkers in the city, although there are also commercial dog walkers who do not have a business license and are not listed in the phone book. Many of these dog walkers are single individuals (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco (Prodog). In San Francisco, commercial dog walkers most often use GGNRA's Fort Funston and Crissy Field, but are also seen at Fort Mason, Baker Beach and Ocean Beach. Commercial dog walkers typically bring between four and ten dogs or more at a time to GGNRA sites and spend about one hour, twice a day, in the park.

Comment [EMB7]: Do we have any idea of the percentage increase?

Comment [SES8]: No – this is all I could get from SEIS

The San Francisco ordinance is anticipated to have a noticeable impact, particularly at Fort Funston and Crissy Field, the two sites most regularly used by dog walkers. Crissy Field already receives intense visitor use, including from individual and commercial dog walkers. GGNRA staff estimates that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays), and typically at least three present, with at least four to six dogs each, at any given time of the day. A 2011 Visitor Use Study found that 24% of visitors at Crissy Field were dog walkers. That same study found that at Fort Funston, an average of 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends), and that on weekdays, 50% of the dogs observed were in groups of five or more dogs, with approximately 15% in groups of ten or more dogs (Attachment C).

Comment [EMB9]: What's the tie to commercial dogwalkers? This doesn't distinguish. Is it that dog use is high generally? Or that commercial dogwalkers impinge on the regular dog walker's visitor experience?

Comment [SES10]: Main point was to establish current conditions, which is specific (likely) to commercial dog walkers at Funston (based on size of group) and is only a summary of current conditions at Crissy.

Currently, certain GGNRA-managed Marin sites are used by commercial dog walkers with more than six dogs per person; dog walkers with six or more dogs have been seen at both Rodeo Beach and the Alta Trail above Marin City. The Alta Trail is regularly used by commercial dog walkers who have an average of ten dogs per ~~person~~ commercial dog walker. GGNRA staff have experienced ~~up to~~ 50 off leash dogs at one time on the Alta Trail.

The preferred alternative for GGNRA's draft dog management plan currently requires that commercial and private dog walkers with more than three dogs must obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites. However, the preferred alternative may change in light of public comment received on the supplemental EIS and Notice of Proposed Rulemaking. Also, a number of steps remain before a final regulation for dog walking in GGNRA could be promulgated. A Supplemental EIS for the draft dog management plan will be released for public comment by early July, 2013. A Notice of Proposed Rulemaking will be released in 2014 for an additional public comment, with a final rule

anticipated in 2015. In the absence of that final rule, commercial dog walkers are not regulated and thus may walk unlimited number of dogs at GGNRA park sites.

The dog walking permit conditions in the draft dog management plan, including the number of dogs allowed per dog walker, were developed initially by the GGNRA Negotiated Rulemaking Committee for dog management at GGNRA, and further developed in the GGNRA draft dog management plan/EIS (draft Plan/EIS). During the public comment period on the draft Plan/EIS, the National Park Service (NPS) received multiple comments regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the number at six dogs with strict guidelines. Other commenters, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker, with some noting that four or more dogs could be hard to control. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of dogs to a maximum of six, while other commenters requested that commercial dog walking not be allowed at all.

In establishing the maximum number of dogs per walker in the draft plan/EIS, the NPS was concerned first and foremost with resource protection and visitor experience and safety, two key objectives of the draft plan/EIS. The NPS questioned whether a dog walker could consistently control more than six dogs in areas open to voice control, particularly in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. The NPS was unable to find literature supporting the idea that more than six dogs would not damage park resources or impact visitor experience and safety, or put another way, would provide both resource protection and visitor experience and safety. Based on public comment, feedback from the GGNRA Negotiated Rulemaking Committee for dog management, park staff observations and research, and law enforcement experience, the NPS believes that allowing more than six dogs total could negatively impact visitor experience and visitor and employee safety.

Applicable Law and Policy:

This interim Compendium amendment appropriately regulates a commercial activity on National Park Service lands, as required by 36 CFR § 5.3, Business Operations and per the guidance of Section 8.1, Use of the Parks, of the National Park Service Management Policies 2006.

This action allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking ~~by this group of users~~, but in a manner that is protective of other park users and park resources. Further, commercial dog walking was not addressed by the 1979 GGNRA Citizen's Advisory Pet Policy (Attachment D), and has not ever been a permitted activity in the park. As stated previously, at the time that the park became aware of this use of park areas, the GGNRA dog management planning process had already begun, and the decision as to whether commercial dog walking ~~was an appropriate use that~~ should be permitted on GGNRA lands was deferred

Comment [EMB11]: How is this relevant to the compendium change? This needs to be addressed within the context of the compendium change, not the dog plan. Could say that info from the dog mgmt. planning effort showed x, y, and z, but need to tie health and safety to the compendium change itself.

Comment [SES12]: Wanted background as to how we are arriving at the number 6.

Comment [EMB13]: 36 CFR 5.3 requires a special regulation particular to a park area to allow a commercial use - "except as such may be specifically authorized under special regulations applicable to a park area, is prohibited."

Without the special reg, we had trouble finding the authority to regulate commercial uses in the dog plan --- as you recall it didn't fit under a CUA or concessions contract. The only other option would be to ban the use. B/c of the interim nature of this, you'll have to stretch the meaning of 5.3 a bit. May be better not to use 5.3 at all.

to the dog management planning process and its accompanying NEPA analysis and rulemaking.

Process for Adopting Compendium Restrictions:

Under 36 C.F.R. Section 1.5, superintendents are authorized to take action to protect park resources. In both emergency and non-emergency situations, park superintendents may adopt compendium provisions that restrict visitor activities.

The proposed regulatory provisions are the minimum level acceptable to meet our management obligations with regard to the protection of park resources and visitor and employee safety.

NEPA Compliance:

The Handbook for NPS Director’s Order 12 contains a listing of Categorical Exclusions. Section 3.4 D(2) of the Director’s Order 12 Handbook provides that “minor changes in programs and regulations pertaining to visitor activities” may be categorically excluded under NEPA.

This compendium amendment that permits be required for commercial dog walking within GGNRA Marin and San Francisco sites would result in minor changes to commercial dog walking activities in the park. The park has prepared all the appropriate Categorical Exclusion screening forms, which are attached for your review. These forms disclose that the actions would result in no measurable adverse environmental effects. Furthermore, no exceptional circumstances or conditions exist that would make use of a Categorical Exclusion inappropriate. As such, we believe that a Categorical Exclusion under NEPA is the appropriate form of NEPA compliance for this regulatory provision.

Public Notice:

The park will provide public notice as described in 36 C.F.R. Section 1.7., specifically through community outreach, outreach to dog walking organizations, brochures and the Park’s website.

Attachments:

- A - Compendium Amendment
- B - NEPA Categorical Exclusion Documentation
- C - 1979 GGNRA Citizen’s Advisory Commission Pet Policy
- D - Leggett and Curry, Assessment of Visitor Activities at Six Sites Within Golden Gate National Recreation Area, 2011

Comment [EMB14]: Per Barbara’s comments, need to address these criteria directly. These are addressed indirectly above.

(a) Consistent with applicable legislation and Federal administrative policies, and based upon a determination that such action is necessary for the maintenance of public health and safety, protection of environmental or scenic values, protection of natural or cultural resources, aid to scientific research, implementation of management responsibilities, equitable allocation and use of facilities, or the avoidance of conflict among visitor use activities, the superintendent may:

(b) Except in emergency situations, a closure, designation, use or activity restriction or condition, or the termination or relaxation of such, which is of a nature, magnitude and duration that will result in a significant alteration in the public use pattern of the park area, adversely affect the park’s natural, aesthetic, scenic or cultural values, require a long-term or significant modification in the resource management objectives of the unit, or is of a highly controversial nature, shall be published as rulemaking in the Federal Register.

(c) Except in emergency situations, prior to implementing or terminating a restriction, condition, public use limit or closure, the superintendent shall prepare a written determination justifying the action. That determination shall set forth the reason(s) the restriction, condition, public use limit or closure authorized by paragraph (a) has been established, and an explanation of why less restrictive measures will not suffice, or in the case of a termination of a restriction, condition, public use limit or closure previously established under paragraph (a), a determination as to why the restriction is no longer necessary and a finding that the termination will not adversely impact park resources. This determination shall be available to the public upon request.

Comment [EMB15]: You might instead use 3.4 A(5) – “Issuances, extensions, renewals, reissuances or minor modifications of concession contracts or permits not entailing new construction”. D(2) seems to fit at first blush, but commercial dog walking doesn’t pertain to “visitor activities.”

Comment [EMB16]: Again, not a visitor activity.

Comment [EMB17]: If use a different CE, this rationale needs to change.

Attachment C
1979 GGNRA Citizen's Advisory Pet Policy

Attachment D

**Leggett and Curry, Assessment of Visitor Activities at Six Sites Within
Golden Gate National Recreation Area, 2011**

Crissy Field
Golden Gate NRA
DO-12 APPENDIX 1
ENVIRONMENTAL SCREENING FORM

A. PROJECT INFORMATION

Park Name: Golden Gate NRA
Project Number: 46523
Project Location: San Francisco and Marin County, California
Project Manager: Shirwin Smith
Project Title: Interim Compendium Amendment Commercial Dog Walking
Admin. Record Location: Bldg 101, Fort Mason
Admin. Record Contact: Steve Ortega

B. PROJECT DESCRIPTION/LOCATION

Compendium of designations closures, public use limits, and other restrictions are imposed under discretionary authority by the General Superintendent, Golden Gate National Recreation Area.

In accordance with the delegated authority provided in Section 1.6 of Title 36 of the Code of Federal Regulations, as authorized by Section 3 of Title 16 of the United States Code, the following interim public use limit and permit requirement is established for the proper management, protection, and use of the Marin and San Francisco sites open to dog walking that are under the jurisdiction of the National Park Service, Golden Gate National Recreation Area (GGNRA). The public has been notified of this action in accordance with the requirements of Section 1.7 of Title 36 of the Code of Federal Regulations.

Under authority of Title 36, Code of Federal Regulations, Section 1.6 the following permit requirement is established:

Any person walking more than three dogs at one time for consideration (commercial dog walker) in any site under the administrative jurisdiction of GGNRA within the City and County of San Francisco or Marin County, where dog walking is allowed, must first obtain a permit from the park.

- Permits will allow a maximum number of six dogs per dog walker.
- Permits will require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA
- Permit holders must abide by all NPS regulations including, in sites that are not open to voice control dog walking per the 1979 Pet Policy, 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet.

This interim action is needed to respond to commercial dog walking permit programs enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which will be in effect July, 2013, and which will limit the number of dogs per dog walker to 8 or 6 dogs, respectively. Given the extremely broad geographical reach (parks, open spaces, Port lands, and PUC properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the NPS reasonably anticipates that a certain number of commercial dog walkers, who would otherwise use areas that would cause them to fall under these ordinances, will instead walk their dogs in areas under the administrative jurisdiction of the NPS in San Francisco and Marin Counties. Commercial dog walking is not yet regulated in NPS areas in San Francisco and Marin, thus commercial dog walkers using NPS sites could avoid the permit fees, requirements, and limit on the number of dogs they may walk on San Francisco and Tiburon lands covered by the new local ordinances.

This interim action is expected to be in effect for approximately 2 years, at which time it will be supplanted by a special regulation for dog walking in GGNRA, which will address commercial dog walking.

Justification

GGNRA has initiated a dog management project which addresses dog walking throughout the park, including commercial dog walking. The preferred alternative in the draft plan requires that commercial and private dog walkers with more than three dogs must obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites. The draft Plan/EIS was released for public comment in 2011 and a supplemental draft Plan/EIS is expected to be released for additional public comment in Fall 2013.. Once the plan is finalized, the NPS will initiate a rulemaking process and seek public comment on the proposed codification of the dog management plan's regulatory elements in the Code of Federal Regulations. A final rule is not anticipated until 2015. In the absence of this interim action, if the status quo is not changed, commercial dog walkers would continue walking unlimited number of dogs at GGNRA sites where dog walking is currently allowed.

In 2012, the City and County of San Francisco passed an ordinance to license and regulate dog walkers who conduct their business in a multitude of areas within the boundaries of the City (*San Francisco Health Code Article 39: Commercial Dog Walking*). The City permit requirement applies to any person walking four or more dogs at any one time, for some sort of payment, on City park property (broadly defined to include, among other areas, all grounds and other property under the management of the Recreation and Park Commission) as well as certain open spaces, certain properties under the jurisdiction of the San Francisco Port Commission, and designated properties under control of the Public Utilities Commission (PUC). Under Article 39, among other requirements, commercial dog walkers must have a business license, be trained or meet minimum experience requirements and carry one million in general liability insurance,. The San Francisco ordinance on commercial dog walking went into effect July 1, 2013, although there is a 120 day grace period to allow completion of permit training requirements. After that time, GGNRA's San Francisco lands where dog walking is allowed will be the predominant open space areas in San Francisco where commercial

dog walking remains unregulated.

The Town of Tiburon in Marin County also enacted a permit requirement that went into effect in July 2013 for commercial dog walkers using open space lands managed by the town. Those permits will require proof of business license, insurance and training, and will limit the number of dogs per walker to six, the same limit that has existed on Marin County Open Space lands since 2002. After that, GGNRA's southern Marin lands where dog walking is allowed will be the primary open space sites in southern Marin where commercial dog walking remains unregulated

Commercial dog walkers have been using GGNRA's San Francisco and Marin sites for at least ten years. During that time, the GGNRA also began a dog management planning process, and the decision as to whether commercial dog walking was an appropriate use that should be permitted on GGNRA lands was deferred to the dog management planning process and its accompanying NEPA analysis and rulemaking. Over the past ten years, the number of commercial dog walkers in San Francisco and Marin has increased. Research and interviews for the draft dog management plan/EIS indicate that there are at least 100 commercial dog walkers in the city, although there are also dog walkers who provide their services for consideration, but do not have a business license and are not listed in the phone book. According to the City and County of San Francisco, approximately 110,000 households in San Francisco own dogs, and an estimated one-third of these households employ the services of dog walkers to care for and exercise their dogs. Many of these dog walkers are single individuals (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco (Prodog). In a recent interview about San Francisco's new commercial dog walking ordinance, a spokesperson for ProDog estimated that there might be as many as 300 commercial dog walkers in San Francisco. In San Francisco, the GGNRA sites most often used by commercial dog walkers are Fort Funston, Crissy Field and Fort Mason, but commercial dog walkers are also seen at Baker Beach and Ocean Beach. Commercial dog walkers typically bring between four and ten dogs or more at a time to GGNRA sites and spend about one hour, twice a day, in the park.

The San Francisco ordinance is anticipated to have a noticeable impact, particularly at Fort Funston and Crissy Field, the two sites regularly used by dog walkers. Crissy Field already receives very high visitor use (approximately 3.2 million in 2009), including from individual and commercial dog walkers. GGNRA staff estimates that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays), and typically at least three present, with at least four to eight dogs each, at any given time of the day. A 2011 Visitor Use Study found that 24% of visitors at Crissy Field were dog walkers. That same study found that at Fort Funston, where the average number of dogs walked on the site each day is 1,600, approximately 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends). On weekends, 3.1% of dogs at Fort Funston are walked in groups larger than 6, accounting for 10 dog walker visits. However, on weekdays, 34.7% of dogs were in groups larger than 6, accounting for approximately 127 dog walker visits. Of that group 19.4% of dogs were in groups larger than 8 (approximately 61 dog walker visits). The study notes: "At Fort Funston, many visitors were observed with large groups of dogs. While some of these visitors may be individuals who own multiple dogs, most are likely professional dog walkers."

Marin County Parks and Open Space began requiring permits for commercial dog walkers on Open Space lands in 2002; the permits allowed a maximum of 6 dogs per walker. Currently, certain GGNRA-managed sites in southern Marin are used by commercial dog walkers with more than six dogs per person; dog walkers with six or more dogs have been seen at both Rodeo Beach and the Alta Trail above Marin City. The Alta Trail, an easily accessible GGNRA site in close proximity to Tiburon, is regularly used by commercial dog walkers who have an average of ten dogs per dog walker. GGNRA staff have often experienced up to 50 off-leash dogs at one time on the Alta Trail. Because of the ease of access from Highway 101, availability of on-street parking at the trailhead and proximity to Tiburon, Alta Trail is likely to be an alternative for those commercial dog walkers who would otherwise use Tiburon open space areas, where there is now a permit requirement and limit of 6 dogs per walker. Without an interim restriction on commercial dog use, commercial dog walking could increase on GGNRA lands in southern Marin, particularly the Alta Trail, which is also used by private dog walkers, hikers, runners and bicyclists.

Applicable Law and Policy:

National Park Service regulations allow superintendents to implement public use limits to protect park resources, equitably allocate use of areas, protect public health and safety, and avoid conflicts among user groups. Public use limits may be adopted following a written determination and publication of the use limitation in the park’s Compendium. Under 36 CFR § 1.6, Permits, the National Park Service may adopt a permit system to implement a public use limit enacted under 36 CFR §1.5.

This interim restriction is consistent with NPS Management Policies, which allow the issuance of permits for special park uses that provide a benefit to an individual, group or organization rather than the public at large, require authorization and some degree of management control to protect resources and the public interest and are not prohibited by law or regulation. In that commercial dog walking is not a visitor-serving use, a permit is the proper authorizing mechanism rather than a commercial use authorization which is intended to benefit the visiting public at large. This interim compendium amendment allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other park users. Use of most popular sites is already heavy – additional unregulated use would aggravate issues among dog walkers both commercial and private, as well as impact or displace other users. This interim action is also not inconsistent with the 1979 GGNRA Citizen’s Advisory Commission Pet Policy. Commercial dog walking was not addressed in the 1979 Pet Policy.

The proposed interim public use limit on commercial dog walkers is not of a nature, magnitude or duration such that it will result in a significant alternation of the public use patterns of the park. The expected duration of this proposed action is approximately two years, when the NPS intends to replace this interim action with a special NPS regulation in the Code of Federal Regulations that will govern dog walking in GGNRA, including commercial dog walking. The scope of this action is also limited. It would only apply to GGNRA lands in San Francisco and Marin counties where dog walking is allowed; GGNRA lands in San Mateo County would not be affected. In addition, this action would only affect commercial dog walkers; private dog walking would not be affected. Commercial dog walkers are a subset of the dog walking that

occurs on GGNRA lands, and only a portion of commercial dog walkers handle more than 6 dogs at one time. More importantly, the proposed action does not ban commercial dog walking. It allows it to continue, and requires a permit with a limit of no more than 6 dogs only in the San Francisco and Marin GGNRA sites that are open to dog walking .

The proposed interim public use limit would not adversely affect the natural, aesthetic or cultural values of park lands in Marin and San Francisco Counties. Because this interim action limits the number of dogs per commercial dog walker, it potentially allows greater control of dogs, particularly in areas where dogs are currently allowed under voice control. Thus, this action would not adversely affect, and may even have a beneficial effect, on natural, aesthetic and cultural values of park lands, by reducing the potential for multiple, large groups of dogs.

Adoption of the proposed public use limit would not require a long-term or significant modification in the park's resource management objectives. This proposed public use limit is being adopted on an interim basis and the GGNRA anticipates that it would be replaced by a final regulation in approximately two years. The proposed action is also consistent with the park's resource management objectives since it is consistent with the goals and objectives of the GGNRA draft Dog Management Plan/Environmental Impact Statement (draft Plan/SEIS), which considered the park's resource management objectives in developing the range of alternatives. This action is also consistent with natural resource goals of the updated park General Management Plan, particularly the goal of maintaining the integrity and diversity of natural resources and systems and mitigating the effects of climate change and urban pressures.

The proposed interim restriction is not highly controversial. Multiple jurisdictions in the Bay Area, including the City and County of San Francisco, the City of Tiburon, and Marin County Parks and Open Space, have recognized the need to impose reasonable restrictions on commercial dog walking and have done so; the most recent actions were in July of this year. The interim use limit proposed here was initially proposed by the commercial dog walking representative to the GGNRA Negotiated Rulemaking Committee, and was further developed with much public input throughout the GGNRA dog management planning effort. This action is similar to the approach that is currently being used in by the adjacent jurisdictions mentioned above.

This proposed interim restriction and permit requirement is the minimum necessary action at this time. The action is narrowly tailored to address the anticipated increase in commercial dog walking that is expected to result from the adoption of local ordinances regulating commercial dog walkers in San Francisco and Tiburon. Without this interim action, it is reasonably expected that GGNRA lands in San Francisco and Marin Counties could see an increase in the amount of commercial dog walkers with large groups of dogs, which in turn would affect the use and enjoyment of park lands by other visitors including dog walkers.

Finally, this interim action is not expected to displace commercial dog walkers to adjacent lands managed by other agencies. Both the City of Tiburon and the Marin County Parks and Open Space District already have similar restrictions on commercial dog walking. In San Francisco, there may be some commercial dog walkers who prefer to use City and County of San Francisco lands, in that they would be allowed an additional 2 dogs per walker under the San Francisco permit. However, that difference is not expected to result in a significant amount of displacement from GGNRA lands to San Francisco-managed sites. Finally, there would be no

displacement onto Presidio Trust (Trust) lands as a result of this action, in that the Trust is proposing a similar interim restriction on Trust lands, intended to be enacted in concert with the GGNRA interim restriction.

Finally, this interim action is necessary for maintenance of public health and safety, and to avoid conflict among visitor use activities. The current, unmanaged activities of commercial dog walkers have contributed to dog walking impacts on, visitors and employees. GGNRA manages much of the publicly accessible San Francisco Bay and ocean coastal lands in San Francisco and Marin counties; park personnel have stated that the increased number of conflicts among park visitors is of great concern. Many of the issues related to the health and safety of visitors to the park and park employees are related to encounters with unruly or aggressive dogs. Reported incidents include being knocked down, intimidated, and bitten by dogs. Additionally, dog-on-dog bites and dog-on-horse bites often involve visitors who could be injured during these conflicts (e.g., attempts to separate dogs, horses bolting). From 2008 through 2011, GGNRA NPS rangers and U.S. Park Police (collectively referred to as law enforcement staff) recorded a total of 2,775 dog-related incidents for leash-law violations, dog bites or attacks, hazardous conditions or pet rescues, and failure to pick up pet excrement at GGNRA sites that are considered in this draft plan/SEIS. The park has also received complaints specifically regarding the intensity of commercial dog walking use on the Alta Trail, which has displaced other users, including dog walkers, from this site.

The NPS has been engaged in a multi-year process to adopt a dog management plan and final dog walking rule for GGNRA. In January 2002 an Advanced Notice of Proposed Rulemaking (ANPR) was published in the Federal Register asking for comment on potential options for future dog management in GGNRA that could include a special regulation for dog walking. The NPS received 8,580 comment documents in response, with 71% favoring adoption of a special regulation. In 2006, the NPS established a Negotiated Rulemaking Committee for Dog Management in GGNRA (Committee); the 38-member Committee's goal was to reach consensus on a special regulation for dog management, however only limited consensus was achieved.

In 2005, the park began its required environmental planning process under NEPA for a dog management plan. A draft plan/EIS was released in January 2011; public comment was open until May 30, 2011. As a result of substantive public comments, NPS determined that a number of changes to the draft plan/EIS would be necessary to respond to public comment, following Council on Environmental Quality (CEQ) guidance that when significant new information or substantial changes to the proposed action occur that are relevant to environmental concerns, a supplemental EIS (SEIS) should be prepared (NEPA Regulations, 40 CFR 1502.9(c)). GGNRA will release the SEIS in by early July 2013 for a 90-day public comment period. Following analysis of public comments on the SEIS, a Notice of Proposed Rulemaking will be prepared and released for public comment. A final EIS and rule are scheduled to be completed by summer, 2015.

This interim action is based on the commercial dog walking proposal contained in the draft plan/EIS, but is more limited in scope in order to respond to the specific, immediate changing conditions. Although some public comment on the draft plan/EIS expressed concern about the financial impact on dog walkers due to the proposed limit on the number of dogs, the NPS

permit limit of six dogs per walker, developed initially during discussions of the Negotiated Rulemaking Committee for Dog Management, is in line with long-established commercial dog walking restrictions at many Bay Area and national land management agencies. Similar restrictions, although permanent rather than interim, about to be enacted on adjacent lands in San Francisco and Marin Counties have caused minimum controversy. The NPS does not expect this to be a highly controversial action.

References:

Leggett and Curry, Assessment of Visitor Activities at Six Sites Within Golden Gate National Recreation Area, 2011

Marin County Open Space District , Guidelines for Commercial Dog Permit Program

Town of Tiburon, Professional Dog Walkers in Open Space

San Francisco Animal Care and Control, Application for Commercial Dog Walker Permit

San Francisco, Dog Walker Legislation 2012

C. RESOURCE EFFECTS TO CONSIDER

| Are any impacts possible on the following physical, natural or cultural resources? | Yes | No | N/A | Data Needed to Determine/Notes |
|--|-----|----|-----|--------------------------------|
| 1. Geological resources – soils, bedrock, streambeds, etc. | | X | | |
| 2. From geohazards | | X | | |
| 3. Air quality | | X | | |
| 4. Soundscapes | | X | | |
| 5. Water quality or quantity | | X | | |
| 6. Streamflow characteristics | | X | | |
| 7. Marine or estuarine resources | | X | | |
| 8. Floodplains or wetlands | | X | | |
| 9. Land use, including occupancy, income, values, ownership, type of use | X | | | |
| 10. Rare or unusual vegetation – old growth timber, riparian, alpine | | X | | |
| 11. Species of special concern (plant or animal; state or federal listed or | | X | | |

| | | | | |
|--|---|---|--|--|
| proposed for listing) or their habitat | | | | |
| 12. Unique ecosystems, biosphere reserves, World Heritage Sites | | X | | |
| 13. Unique or important wildlife or wildlife habitat | X | | | |
| 14. Unique or important fish or fish habitat | | X | | |
| 15. Introduce or promote non-native species (plant or animal) | | X | | |
| 16. Recreation resources, including supply, demand, visitation, activities, etc. | X | | | |
| 17. Visitor experience, aesthetic resources | X | | | The subjective experience of some dog walkers and other visitors may be beneficially affected. |
| 18. Cultural resources including cultural landscapes, ethnographic resources | | X | | |
| 19. Socioeconomics, including employment, occupation, income changes, tax base, infrastructure | | X | | There will be no measurable effects on a national, regional, or city-wide scale. |
| 20. Minority and low income populations, ethnography, size, migration patterns, etc. | | X | | |
| 21. Energy resources | | X | | |
| 22. Other agency or tribal land use plans or policies | | X | | |
| 23. Resources, including energy, conservation potential | | X | | |
| 24. Urban quality, gateway communities, etc. | X | | | |
| 25. Long-term management of resources or land/resource productivity | | X | | |
| 26. Other important environment resources (e.g. geothermal, paleontological resources)? | | X | | |

Comment [EMB1]: Where there are impacts, need to explain why negligible (compared to the no action – or current use). In that light, most of these should in fact be beneficial.

GGNRA ESF ADDENDUM QUESTIONS & ANSWERS

| ESF Addendum Questions | Yes | No | N/A | Data Needed to Determine/Notes |
|--|-----|----|-----|--------------------------------|
| 1. Adversely affect historic fabric, terrain or setting? | | X | | |
| 2. Change historic ground cover or | | X | | |

| | | | | |
|--|---|---|--|---|
| vegetation? | | | | |
| 3.Introduce non-historic elements (visible, audible or atmospheric) into a historic setting, structure or environment? | | X | | |
| 4.Reintroduce historic elements in a historic setting or environment? | | X | | |
| 5.Are there any archaeological resources in the project area? | | X | | |
| 6.Maintain, create or change a public or employee safety or health hazard? | X | | | Would improve safety for public and employees by limiting numbers of dogs per commercial dog walker. |
| 7.Compromise slope stability? | | X | | |
| 8.Change the pattern of surface water flow, alter hydrologic processes or affect erosion? | | X | | |
| 9.If there is ground disturbance, is it greater than one acre? | | X | | |
| 10.Affect park trails or trail usage? | X | | | Improve trail and site usage by limiting numbers of dogs per commercial dog walker. |
| 11.Affect current or planned visitor services, recreation resources, access or available parking? | X | | | Improve access for other user groups by limiting numbers of dogs per commercial dog walker, may have minor effect on parking, this has been determined to be a negligible impact to visitors. |
| 12. Change congestion levels, traffic volumes or traffic safety conditions for vehicles, pedestrians or bicyclists? | X | | | Lessen congestion for pedestrian and bicyclists, particularly on trails. |
| 13. Change or impede accessibility? | X | | | Improve accessibility by limiting numbers of dogs per commercial dog walker, particularly in areas heavily used by a variety of user groups. |
| 14. Change the demand for police or emergency services or create an attractive nuisance? | X | | | NPS law enforcement will initially be required to increase patrols of most heavily used areas during permit program implementation. |
| 15. Changes dark conditions, natural night skies or glare? | | X | | |
| 16. Alter scenic features, viewsheds, be visually intrusive or add to a degraded visual condition? | | X | | |
| 17. Involve handling/storage of hazardous substances or work in | | X | | |

| | | | | |
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| areas of possible contamination? | | | | |
| 18. Change the level of emissions from vehicles or increase other air pollutants? | | X | | |
| 19. Change the amount of resource use (water, fuel) or waste generated? | | X | | |
| 20. Involve issues of concern for park neighbors or organizations or generate media attention? | X | | | Media attention to this action is possible. It is anticipated that some organizations may object to this action but that other individuals and organizations will support this action. |
| 21. Affect long-term management of resources? | | X | | |
| 22. Set a precedent within GGNRA? | | X | | A permit requirement for commercial dog walkers has been included in the multi-year dog management planning effort, and is, or has been addressed by both the Negotiated Rulemaking and Draft Plan/EIS for Dog Management. |
| Will the proposed action(s) require removing, changing, relocating, replacing, and/or adding signs? | X | | | May require addition of signs at most popular commercial dog walking sites especially during implementation. |

D. MANDATORY CRITERIA

| Mandatory Criteria: If implemented, would the proposal: | Yes | No | N/A | Data Needed to Determine/Notes |
|---|-----|----|-----|--------------------------------|
| A. Have material adverse effects on public health or safety? | | X | | |
| B. Have adverse effects on such unique characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands; floodplains; or ecologically significant or | | X | | |

| | | | |
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| critical areas, including those listed on the National Register of Natural Landmarks? | | | |
| C. Have highly controversial environmental effects? | | X | |
| D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks? | | X | |
| E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects? | | X | A permit requirement for commercial dog walkers has been included in the multi-year dog management planning effort, and is, or has been addressed by both the Negotiated Rulemaking and Draft Plan/EIS for Dog Management. |
| F. Be directly related to other actions with individually insignificant, but cumulatively significant, environmental effects? | | X | This action is related to actions that will be undertaken by neighboring agencies. The effects of all of these actions when considered together are not cumulatively significant. |
| G. Have adverse effects on properties listed or eligible for listing on the National Register of Historic Places? | | X | |
| H. Have adverse effects on species listed or proposed to be listed on the List of Endangered or Threatened Species or have adverse effects on designated Critical Habitat for these species? | | X | |
| I. Require compliance with Executive Order 11988 (Floodplain Management), Executive Order 11990 (Protection of Wetlands), or the Fish and Wildlife Coordination Act? | | X | |
| J. Threaten to violate a federal, | | X | |

| | | | | |
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| state, local, or tribal law or requirement imposed for the protection of the environment? | | | | |
| K. Involve unresolved conflicts concerning alternative uses of available resources (NEPA sec. 102(2)(E)? | | X | | |
| L. Have a disproportionate, significant adverse effect on low-income or minority populations (EO 12898)? | | X | | |
| M. Restrict access to and ceremonial use of Indian sacred sites by Indian religious practitioners or adversely affect the physical integrity of such sacred sites (EO 13007)? | | X | | |
| N. Contribute to the introduction, continued existence, or spread of federally listed noxious weeds (Federal Noxious Weed Control Act)? | | X | | |
| O. Contribute to the introduction, continued existence, or spread of non-native invasive species or actions that may promote the introduction, growth or expansion of the range of non-native invasive species (EO 13112)? | | X | | |
| P. Require a permit from a federal, state, or local agency to proceed, unless the agency from which the permit is required agrees that a CE is appropriate? | | X | | |
| Q. Have the potential for | | X | | |

| | | | | |
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| significant impact as indicated by a federal, state, or local agency or Indian tribe? | | | | |
| R. Have the potential to be controversial because of disagreement over possible environmental effects? | | X | | Environmental organizations are concerned with the potential for damage to resources by dog walkers with multiple dogs, but are supportive of the park action to permit these users in order to appropriately manage this use. |
| S. Have the potential to violate the NPS Organic Act by impairing park resources or values? | | X | | |

E. OTHER INFORMATION (Please answer the following questions/provide requested information.)

Are personnel preparing this form familiar with the site? *Yes*

Did personnel conduct a site visit? *Yes*

Leggett and Curry, Assessment of Visitor Activities at Six Sites Within Golden Gate National Recreation Area, 2011

Is the project in an approved plan such as a General Management Plan or an Implementation Plan with an accompanying environmental document?

GGNRA Draft Dog Management Plan/SEIS (draft plan/SEIS) is considering a range of actions to manage commercial dog walking. The preferred alternative of the draft plan/SEIS includes a permit requirement for commercial dog walking that would, among other provisions, limit the number of dogs per dog walker to six. This interim permitting requirement will be replaced by the final regulation for dog walking in GGNRA, which will be based on the final plan/EIS. This interim action, a modest permit requirement to address upcoming actions by adjoining land management agencies, will not pre-judge or drive decisions on what alternative will be selected.

Are there any interested or affected agencies or parties? **Yes, (see description in CE form)**

Did you make a diligent effort to contact them? **Yes**

Has consultation with all affected agencies or tribes been completed?

Per 36 CFR 1.7, GGNRA will inform and educate park users in the following manner: community outreach, outreach to dog walking organizations, brochures and the Park's website.

Comment [EMB2]: 106 consultation is req'd, and not met through 1.7. Same for tribal, although including in the tribal update newsletter probably OK for such a minor action.

Are there any connected, cumulative, or similar actions as part of the proposed action?

This action is related to actions that will be undertaken by neighboring agencies. The incremental impacts of this action would contribute only minimally to cumulative impacts, and would not cause significant impacts.

F. NEPA PATHWAY

This project is an action that has been determined to result in no measurable environmental effects (see attached Environmental Screening Form). It is therefore categorically excluded from further National Environmental Policy Act analysis under Categorical Exclusion: DO12 Section 3.4:

D(2): *Minor changes in programs and regulations pertaining to visitor activities.*

G. INTERDISCIPLINARY TEAM SIGNATORY *(All interdisciplinary team members must sign.)*

By signing this form, you affirm the following: you have either completed a site visit or are familiar with the specifics of the site; you have consulted with affected agencies and tribes; and you, to the best of your knowledge, have answered the questions posed in the checklist correctly.

| | | |
|---|----------------------------------|-------------|
| Interdisciplinary Team Leader Name /s/ Shirwin Smith | Field of Expertise Management | Date Signed |
| Technical Specialists Names /s/ XXXX | Field of Expertise | Date Signed |

H. SUPERVISORY SIGNATORY

Based on the environmental impact information contained in the statutory compliance file and in this environmental screening form, environmental documentation for this stage of the subject project is complete.

Recommended:

| | | |
|--|------------------------------------|------|
| Compliance Specialist /s/Steve Ortega | Telephone Number (415) 561-4955 | Date |
|--|------------------------------------|------|

Approved:

| | | |
|---|-----------------------------------|------|
| Superintendent /s/ Frank Dean (signed copy on file) | Telephone Number (415)561-4720 | Date |
|---|-----------------------------------|------|

**Crissy Field
Golden Gate NRA
DO-12 APPENDIX 1**
ENVIRONMENTAL SCREENING FORM

A. PROJECT INFORMATION

Park Name: Golden Gate NRA
Project Number: 46523
Project Location: San Francisco and Marin County, California
Project Manager: Shirwin Smith
Project Title: Interim Compendium Amendment Commercial Dog Walking
Admin. Record Location: Bldg 101, Fort Mason
Admin. Record Contact: Steve Ortega

B. PROJECT DESCRIPTION/LOCATION

Compendium of designations closures, public use limits, and other restrictions are imposed under discretionary authority by the General Superintendent, Golden Gate National Recreation Area.

In accordance with the delegated authority provided in Section 5.3 of Title 36 of the Code of Federal Regulations, as authorized by Section 3 of Title 16 of the United States Code, the following interim compendium amendment is established for the proper management, protection, and use of the Marin and San Francisco sites that are under the jurisdiction of the National Park Service, Golden Gate National Recreation Area (GGNRA). The public has been notified of this action in accordance with the requirements of Section 1.7 of Title 36 of the Code of Federal Regulations.

Under authority of Title 36, Code of Federal Regulations, Section 5.3 the following permit requirement is established:

Comment [EMB1]: see comments on cover memo which uses same language as below.

Any person walking three or more dogs at one time for consideration (commercial dog walker) in any site under the administrative jurisdiction of GGNRA within the City and County of San Francisco or Marin County, where dog walking is allowed, must first obtain a permit from the park.

- Permits will allow a maximum number of six dogs per dog walker.
- Permits will require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA
- Permit holders must abide by all NPS regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice control dog walking per the 1979 Pet Policy.

This interim compendium amendment is needed to respond to commercial dog walking

permit programs enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which will be in effect July, 2013, and which will limit the number of dogs per dog walker to 8 or 6 dogs, respectively. Given the extremely broad geographical reach (parks, open spaces, Port lands, and PUC properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the NPS reasonably anticipates that a certain number of commercial dog walkers, who would otherwise use areas that would cause them to fall under these ordinances, will instead walk their dogs in areas under the administrative jurisdiction of the NPS in San Francisco and Marin Counties. Commercial dog walking is not yet regulated in NPS areas in San Francisco and Marin, thus commercial dog walkers using NPS sites could avoid the permit fees, requirements, and limit on the number of dogs they may walk on San Francisco and Tiburon lands covered by the new local ordinances.

This interim action is expected to be in effect for approximately 20 months, at which time it will be supplanted by a special regulation for dog walking in GGNRA, which will address commercial dog walking.

Justification

GGNRA has initiated a dog management project which addresses dog walking throughout the park, including commercial dog walking. The preferred alternative in the draft plan requires that commercial and private dog walkers with more than three dogs must obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites. However, a number of steps remain before a final regulation for dog walking in GGNRA could be promulgated. A Supplemental EIS for the draft dog management plan will be released for public comment by early July, 2013. A Notice of Proposed Rulemaking will be released in 2014 for an additional public comment, with a final rule anticipated in 2015. In the absence of that final rule, commercial dog walkers are not regulated and thus may walk unlimited number of dogs at GGNRA park sites.

In 2012, the City and County of San Francisco passed an ordinance to license and regulate dog walkers who conduct their business in a multitude of areas within the boundaries of the City (*San Francisco Health Code Article 39: Commercial Dog Walking*). The City permit requirement applies to any person walking four or more dogs at any one time, for some sort of payment, on City park property (broadly defined to include, among other areas, all grounds and other property under the management of the Recreation and Park Commission) as well as certain open spaces, certain properties under the jurisdiction of the San Francisco Port Commission, and designated properties under control of the Public Utilities Commission (PUC). Under Article 39, among other requirements, commercial dog walkers must be trained or meet minimum experience requirements, be free of convictions related to animal cruelty within the previous five years, carry one million in general liability insurance, provide sufficient drinking water for the dogs in their charge, transport dogs in a safe manner, and have proper dog walking safety equipment as specified by the City's Director of Public Works. This permit system will go into effect on July 1, 2013. After that time, GGNRA's San Francisco lands where dog walking is allowed will be the predominant open space areas in San Francisco where commercial dog walking remains unregulated.

The Town of Tiburon in Marin County also intends to enact a permit requirement in 2013 for commercial dog walkers using open space lands managed by the town. Those permits will require proof of business license, insurance and training, and will limit the number of dogs per walker to six, the same limit that has existed on Marin County Open Space lands since 2002. The Tiburon permit program is expected to be in place by July 2013. After that, GGNRA Marin lands where dog walking is allowed will be the only open space lands in Marin where commercial dog walking remains unregulated

Commercial dog walkers have been using GGNRA's San Francisco and Marin sites for at least ten years. During that time, the GGNRA dog management planning process was also begun, and the decision as to whether commercial dog walking was an appropriate use that should be permitted on GGNRA lands was deferred to the dog management planning process and its accompanying NEPA analysis and rulemaking. Over the past ten years, the number of commercial dog walkers in San Francisco and Marin has increased. Research and interviews for the draft dog management plan/EIS indicate that there are at least 100 commercial dog walkers in the city, although there are also dog walkers who provide their services for consideration, but do not have a business license and are not listed in the phone book. According to the City and County of San Francisco, approximately 110,000 households in San Francisco own dogs, and an estimated one-third of these households employ the services of dog walkers to care for and exercise their dogs. Many of these dog walkers are single individuals (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco (Prodog).

In San Francisco, commercial dog walkers most often use GGNRA's Fort Funston and Crissy Field, but are also seen at Fort Mason, Baker Beach and Ocean Beach. Currently, commercial dog walkers typically bring between four and ten dogs or more at a time to GGNRA sites and spend about one hour, twice a day, in the park. GGNRA reasonably expects that the San Francisco ordinance may have a noticeable impact on GGNRA sites, particularly at Fort Funston and Crissy Field, the two sites most regularly used by dog walkers. Crissy Field receives intense visitor use, including from individual and commercial dog walkers. GGNRA staff estimates that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays), and typically at least three present, with at least four to six dogs each, at any given time of the day. A 2011 Visitor Use Study for GGNRA found that 24% of visitors at Crissy Field were dog walkers. That same study found that at Fort Funston, an average of 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends), and that on weekdays, 50% of the dogs observed were in groups of five or more dogs, with approximately 15% in groups of ten or more dogs (Attachment C).

In Marin County, some GGNRA-managed sites are used by commercial dog walkers with more than six dogs per person; dog walkers with six or more dogs have been seen at Rodeo Beach and on the Alta Trail above Marin City. The Alta Trail is regularly used by commercial dog walkers who have an average of ten dogs per person. GGNRA staff have experienced 30 to 50 off leash dogs at one time on the Alta Trail.

The NPS has determined that the subject Compendium amendment is consistent with applicable legislation and policy, including the 1916 Organic Act and the 1970 General Authorities Act, as well as the park's enabling legislation which states that "In carrying

out the provisions of this Act, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.” This action is also consistent with Section 8.1 of the 2006 NPS Management Policies, which directs NPS managers to actively manage and, where necessary, regulate park uses in order to preserve park resources and values for the enjoyment of future generations. This action would also be consistent with NPS regulations, specifically 36 CFR 5.3, which prohibits engaging or soliciting any business in park areas, unless through a permit, contract, or written agreement, except as authorized under a special regulation. As previously noted, the GGNRA dog management plan’s preferred alternative proposes to allow commercial dog walking through the special dog management regulation that would be promulgated for GGNRA; this interim action would apply the intent of the plan until the special regulation is in place in 2015.

Comment [SES2]: Do we need to address Barley in here somewhere?
“The June 2005 ruling of the U.S. District Court in U.S. v. Barley did not eliminate the park’s ability to exercise its authority to prevent detrimental impacts to park resources and values.”

Finally, this interim action is necessary for maintenance of public health and safety, and to avoid conflict among visitor use activities. The current, unmanaged activities of commercial dog walkers have contributed to dog walking impacts on park resources, visitors and employees. GGNRA manages much of the publicly accessible San Francisco Bay and ocean coastal lands in San Francisco and Marin counties; park personnel have stated that the increased number of conflicts among park visitors is of great concern. Many of the issues related to the health and safety of visitors to the park and park employees are related to encounters with unruly or aggressive dogs. Reported incidents include being knocked down, intimidated, and bitten by dogs. Additionally, dog-on-dog bites and dog-on-horse bites often involve visitors who could be injured during these conflicts (e.g., attempts to separate dogs, horses bolting). From 2008 through 2011, GGNRA NPS rangers and U.S. Park Police (collectively referred to as law enforcement staff) recorded a total of 2,775 dog-related incidents for leash-law violations, dog bites or attacks, hazardous conditions or pet rescues, and failure to pick up pet excrement at GGNRA sites that are considered in this draft plan/SEIS. The park has also received complaints specifically regarding the intensity of commercial dog walking use on the Alta Trail, which has displaced other users, including dog walkers, from this site.

The NPS also believes that no less restrictive measures are reasonably available at this time. The adoption of a special use permit requirement for a portion of the dog-walking public, Commercial Dog Walkers, is narrowly tailored to address the anticipated increase in commercial dog walking that NPS-administered areas in Marin and San Francisco Counties are likely to experience as a result of these two, new local commercial dog walking ordinances. The permit requirement does not prohibit this group – commercial dog walkers – from using park sites, nor does it require that they adhere to dog walking regulations different than those that currently apply to all dog walkers in GGNRA. The permit requirement only limits the numbers of dogs that can be walked at one time by commercial dog walkers, similar to all surrounding Marin and San Francisco land management jurisdictions that allow commercial dog walking.

The NPS has been engaged in a multi-year process to adopt a dog management plan and final dog walking rule for GGNRA. In January 2002 an Advanced Notice of Proposed Rulemaking (ANPR) was published in the Federal Register asking for comment on potential options for future dog management in GGNRA that could include a special

regulation for dog walking. The NPS received 8,580 comment documents in response, with 71% favoring adoption of a special regulation. In 2006, the NPS established a Negotiated Rulemaking Committee for Dog Management in GGNRA (Committee); the 38- member Committee's goal was to reach consensus on a special regulation for dog management, however only limited consensus was achieved.

In 2005, the park began its required environmental planning process under NEPA for a dog management plan. A draft plan/EIS was released in January 2011; public comment was open until May 30, 2011. As a result of substantive public comments, NPS determined that a number of changes to the draft plan/EIS would be necessary to be respond to public comment, following Council on Environmental Quality (CEQ) guidance that when significant new information or substantial changes to the proposed action occur that are relevant to environmental concerns, a supplemental EIS (SEIS) should be prepared (NEPA Regulations, 40 CFR 1502.9(c)). GGNRA will release the SEIS in by early July 2013 for a 90-day public comment period. Following analysis of public comments on the SEIS, a Notice of Proposed Rulemaking will be prepared and released for public comment. A final EIS and rule are scheduled to be completed by summer, 2015.

This proposed Compendium amendment, addressing only a specific segment of the public – commercial dog walkers – is not of a nature, magnitude or duration that will result in a significant alteration of public use patterns. This requirement only applies to GGNRA-managed lands in San Francisco and Marin Counties where dog walking is allowed. The action is interim in nature, and does not prohibit this specific segment from using these areas of GGNRA, merely requires that they obtain a permit to do so. Neither will this interim action adversely affect the park's natural, aesthetic, scenic or cultural values; instead it may have a beneficial effect on park resources and the visitor experience by limiting the number of dogs that can be brought to the park at one time by an individual walker. This interim requirement will enable the dog walkers to better manage their dogs, potentially minimizing the impacts on resources and other visitor groups.

This interim action is based on the commercial dog walking proposal contained in the draft plan/EIS, but is more limited in scope in order to respond the specific, immediate changing conditions. Although some public comment on the draft plan/EIS expressed concern about the financial impact on dog walkers due to the proposed limit on the number of dogs, the NPS permit limit of six dogs per walker, developed initially during discussions of the Negotiated Rulemaking Committee for Dog Management, is in line with long-established commercial dog walking restrictions at many Bay Area and national land management agencies. Similar restrictions, although permanent rather than interim, about to be enacted on adjacent lands in San Francisco and Marin Counties have caused minimum controversy. The NPS does not expect this to be a highly controversial action.

References:

Leggett and Curry, Assessment of Visitor Activities at Six Sites Within Golden Gate National Recreation Area, 2011

Marin County Open Space District , Guidelines for Commercial Dog Permit Program

Town of Tiburon, Professional Dog Walkers in Open Space

San Francisco Animal Care and Control, Application for Commercial Dog Walker Permit

San Francisco, Dog Walker Legislation 2012

C. RESOURCE EFFECTS TO CONSIDER

| Are any impacts possible on the following physical, natural or cultural resources? | Yes | No | N/A | Data Needed to Determine/Notes |
|--|-----|----|-----|--------------------------------|
| 1. Geological resources – soils, bedrock, streambeds, etc. | | X | | |
| 2. From geohazards | | X | | |
| 3. Air quality | | X | | |
| 4. Soundscapes | | X | | |
| 5. Water quality or quantity | | X | | |
| 6. Streamflow characteristics | | X | | |
| 7. Marine or estuarine resources | | X | | |
| 8. Floodplains or wetlands | | X | | |
| 9. Land use, including occupancy, income, values, ownership, type of use | X | | | |
| 10. Rare or unusual vegetation – old growth timber, riparian, alpine | | X | | |
| 11. Species of special concern (plant or animal; state or federal listed or proposed for listing) or their habitat | | X | | |
| 12. Unique ecosystems, biosphere reserves, World Heritage Sites | | X | | |
| 13. Unique or important wildlife or wildlife habitat | X | | | |
| 14. Unique or important fish or fish habitat | | X | | |
| 15. Introduce or promote non-native species (plant or animal) | | X | | |
| 16. Recreation resources, including | X | | | |

Comment [EMB3]: Where there are impacts, need to explain why negligible (compared to the no action – or current use). In that light, most of these should in fact be beneficial.

| | | | | |
|--|---|---|--|--|
| supply, demand, visitation, activities, etc. | | | | |
| 17. Visitor experience, aesthetic resources | X | | | The subjective experience of some dog walkers and other visitors may be beneficially affected. |
| 18. Cultural resources including cultural landscapes, ethnographic resources | | X | | |
| 19. Socioeconomics, including employment, occupation, income changes, tax base, infrastructure | | X | | There will be no measurable effects on a national, regional, or city-wide scale. |
| 20. Minority and low income populations, ethnography, size, migration patterns, etc. | | X | | |
| 21. Energy resources | | X | | |
| 22. Other agency or tribal land use plans or policies | | X | | |
| 23. Resources, including energy, conservation potential | | X | | |
| 24. Urban quality, gateway communities, etc. | X | | | |
| 25. Long-term management of resources or land/resource productivity | | X | | |
| 26. Other important environment resources (e.g. geothermal, paleontological resources)? | | X | | |

GGNRA ESF ADDENDUM QUESTIONS & ANSWERS

| ESF Addendum Questions | Yes | No | N/A | Data Needed to Determine/Notes |
|---|------------|-----------|------------|---|
| 1. Adversely affect historic fabric, terrain or setting? | | X | | |
| 2. Change historic ground cover or vegetation? | | X | | |
| 3. Introduce non-historic elements (visible, audible or atmospheric) into a historic setting, structure or environment? | | X | | |
| 4. Reintroduce historic elements in a historic setting or environment? | | X | | |
| 5. Are there any archaeological resources in the project area? | | X | | |
| 6. Maintain, create or change a public or employee safety or health hazard? | X | | | Would improve safety for public and employees by limiting numbers of dogs per |

| | | | | |
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| | | | | commercial dog walker. |
| 7. Compromise slope stability? | | X | | |
| 8. Change the pattern of surface water flow, alter hydrologic processes or affect erosion? | | X | | |
| 9. If there is ground disturbance, is it greater than one acre? | | X | | |
| 10. Affect park trails or trail usage? | X | | | Improve trail and site usage by limiting numbers of dogs per commercial dog walker. |
| 11. Affect current or planned visitor services, recreation resources, access or available parking? | X | | | Improve access for other user groups by limiting numbers of dogs per commercial dog walker, may have minor effect on parking, this has been determined to be a negligible impact to visitors. |
| 12. Change congestion levels, traffic volumes or traffic safety conditions for vehicles, pedestrians or bicyclists? | X | | | Lessen congestion for pedestrian and bicyclists, particularly on trails. |
| 13. Change or impede accessibility? | X | | | Improve accessibility by limiting numbers of dogs per commercial dog walker, particularly in areas heavily used by a variety of user groups. |
| 14. Change the demand for police or emergency services or create an attractive nuisance? | X | | | NPS law enforcement will initially be required to increase patrols of most heavily used areas during permit program implementation. |
| 15. Changes dark conditions, natural night skies or glare? | | X | | |
| 16. Alter scenic features, viewsheds, be visually intrusive or add to a degraded visual condition? | | X | | |
| 17. Involve handling/storage of hazardous substances or work in areas of possible contamination? | | X | | |
| 18. Change the level of emissions from vehicles or increase other air pollutants? | | X | | |
| 19. Change the amount of resource use (water, fuel) or waste generated? | | X | | |
| 20. Involve issues of concern for park neighbors or organizations or generate media attention? | X | | | Media attention to this action is possible. It is anticipated that some organizations may object to this action but that other individuals and |

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| | | | | organizations will support this action. |
| 21. Affect long-term management of resources? | | X | | |
| 22. Set a precedent within GGNRA? | | X | | A permit requirement for commercial dog walkers has been included in the multi-year dog management planning effort, and is, or has been addressed by both the Negotiated Rulemaking and Draft Plan/EIS for Dog Management. |
| Will the proposed action(s) require removing, changing, relocating, replacing, and/or adding signs? | X | | | May require addition of signs at most popular commercial dog walking sites especially during implementation. |

D. MANDATORY CRITERIA

| Mandatory Criteria: If implemented, would the proposal: | Yes | No | N/A | Data Needed to Determine/Notes |
|---|------------|-----------|------------|---------------------------------------|
| A. Have material adverse effects on public health or safety? | | X | | |
| B. Have adverse effects on such unique characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands; floodplains; or ecologically significant or critical areas, including those listed on the National Register of Natural Landmarks? | | X | | |
| C. Have highly controversial environmental effects? | | X | | |
| D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown | | X | | |

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| environmental risks? | | | | |
| E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects? | | X | | A permit requirement for commercial dog walkers has been included in the multi-year dog management planning effort, and is, or has been addressed by both the Negotiated Rulemaking and Draft Plan/EIS for Dog Management. |
| F. Be directly related to other actions with individually insignificant, but cumulatively significant, environmental effects? | | X | | This action is related to actions that will be undertaken by neighboring agencies. The effects of all of these actions when considered together are not cumulatively significant. |
| G. Have adverse effects on properties listed or eligible for listing on the National Register of Historic Places? | | X | | |
| H. Have adverse effects on species listed or proposed to be listed on the List of Endangered or Threatened Species or have adverse effects on designated Critical Habitat for these species? | | X | | |
| I. Require compliance with Executive Order 11988 (Floodplain Management), Executive Order 11990 (Protection of Wetlands), or the Fish and Wildlife Coordination Act? | | X | | |
| J. Threaten to violate a federal, state, local, or tribal law or requirement imposed for the protection of the environment? | | X | | |
| K. Involve unresolved conflicts concerning alternative uses of available resources (NEPA sec. 102(2)(E))? | | X | | |
| | | X | | |

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| L. Have a disproportionate, significant adverse effect on low-income or minority populations (EO 12898)? | | | |
| M. Restrict access to and ceremonial use of Indian sacred sites by Indian religious practitioners or adversely affect the physical integrity of such sacred sites (EO 13007)? | | X | |
| N. Contribute to the introduction, continued existence, or spread of federally listed noxious weeds (Federal Noxious Weed Control Act)? | | X | |
| O. Contribute to the introduction, continued existence, or spread of non-native invasive species or actions that may promote the introduction, growth or expansion of the range of non-native invasive species (EO 13112)? | | X | |
| P. Require a permit from a federal, state, or local agency to proceed, unless the agency from which the permit is required agrees that a CE is appropriate? | | X | |
| Q. Have the potential for significant impact as indicated by a federal, state, or local agency or Indian tribe? | | X | |
| R. Have the potential to be controversial because of disagreement over possible environmental effects? | | X | Environmental organizations are concerned with the potential for damage to resources by dog walkers with multiple dogs, but are supportive of the park action to permit these users in order to appropriately manage this use. |
| S. Have the potential to violate | | X | |

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| the NPS Organic Act by impairing park resources or values? | | | | |
|--|--|--|--|--|

E. OTHER INFORMATION (Please answer the following questions/provide requested information.)

Are personnel preparing this form familiar with the site? **Yes**

Did personnel conduct a site visit? **Yes**

Leggett and Curry, Assessment of Visitor Activities at Six Sites Within Golden Gate National Recreation Area, 2011

Is the project in an approved plan such as a General Management Plan or an Implementation Plan with an accompanying environmental document?

GGNRA Draft Dog Management Plan/SEIS (draft plan/SEIS) is considering a range of actions to manage commercial dog walking. The preferred alternative of the draft plan/SEIS includes a permit requirement for commercial dog walking that would, among other provisions, limit the number of dogs per dog walker to six. This interim permitting requirement will be replaced by the final regulation for dog walking in GGNRA, which will be based on the final plan/EIS. This interim action, a modest permit requirement to address upcoming actions by adjoining land management agencies, will not pre-judge or drive decisions on what alternative will be selected.

Are there any interested or affected agencies or parties? **Yes, (see description in CE form)**

Did you make a diligent effort to contact them? **Yes**

Has consultation with all affected agencies or tribes been completed?

Per 36 CFR 1.7, GGNRA will inform and educate park users in the following manner: community outreach, outreach to dog walking organizations, brochures and the Park's website.

Comment [EMB4]: 106 consultation is req'd, and not met through 1.7. Same for tribal, although including in the tribal update newsletter probably OK for such a minor action.

Are there any connected, cumulative, or similar actions as part of the proposed action?

This action is related to actions that will be undertaken by neighboring agencies. ~~The effects of all of these actions when considered together are not cumulatively significant.~~ The incremental impacts of this action would contribute only minimally to cumulative impacts, and would not cause significant impacts.

F. NEPA PATHWAY

This project is an action that has been determined to result in no measurable environmental effects (see attached Environmental Screening Form). It is therefore categorically excluded from further National Environmental Policy Act analysis under Categorical Exclusion: DO12 Section 3.4:

D(2): *Minor changes in programs and regulations pertaining to visitor activities.*

G. INTERDISCIPLINARY TEAM SIGNATORY (All interdisciplinary team members must sign.)

By signing this form, you affirm the following: you have either completed a site visit or are familiar with the specifics of the site; you have consulted with affected agencies and tribes; and you, to the best of your knowledge, have answered the questions posed in the checklist correctly.

| | | |
|---|----------------------------------|-------------|
| Interdisciplinary Team Leader Name /s/ Shirwin Smith | Field of Expertise Management | Date Signed |
| Technical Specialists Names /s/ XXXX | Field of Expertise | Date Signed |

H. SUPERVISORY SIGNATORY

Based on the environmental impact information contained in the statutory compliance file and in this environmental screening form, environmental documentation for this stage of the subject project is complete.

Recommended:

| | | |
|--|------------------------------------|------|
| Compliance Specialist /s/Steve Ortega | Telephone Number (415) 561-4955 | Date |
|--|------------------------------------|------|

Approved:

| | | |
|---|-----------------------------------|------|
| Superintendent /s/ Frank Dean (signed copy on file) | Telephone Number (415)561-4720 | Date |
|---|-----------------------------------|------|

COMPENDIUM AMENDMENT

PART 5 – COMMERCIAL AND PRIVATE OPERATIONS

36 CFR §5.3 – BUSINESS OPERATIONS

COMMERCIAL DOG WALKING

The walking of four or more dogs at one time by any one person for consideration (commercial dog walking) is prohibited within San Francisco and Marin County sites administered by Golden Gate National Recreation Area (GGNRA), where dog walking is allowed, unless:

- That person has been issued a currently valid permit from GGNRA.
- The walking of four or more dogs is done pursuant to the terms and conditions of that permit.
- Permit holders abide by all National Park Service regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice-control dog walking per the 1979 Pet Policy.
- The permit is produced for inspection upon request by an officer with law enforcement authority in areas administered by GGNRA.

GOLDEN GATE NATIONAL RECREATION AREA

Commercial Dog Walking Permit Requirement Interim Compendium Amendment

Summary: The public is invited to comment on the National Park Service (NPS) proposal to require that any person walking four or more dogs at one time for consideration (commercial dog walker) in any Marin or San Francisco site of Golden Gate National Recreation Area (GGNRA) where dog walking is allowed, to obtain a permit from the park. Permits will allow a maximum of six dogs per dog walker, and require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA. Permit holders must abide by all NPS regulations, including 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice control dog walking per the 1979 Pet Policy.

This would be an interim action and would remain in effect until the final special regulation for dog walking in GGNRA, which will address commercial dog walking, is promulgated. That final special regulation is anticipated in 2015. Should the Superintendent of GGNRA decide to approve this interim action, an amendment to GGNRA's Compendium¹ would be completed (per 36 CFR 1.5).

The NPS thanks you for your participation in this process.

Dates:

Comments on this proposal must be received by XXX, XX, 2013.

Addresses:

Comments may be submitted online at https://parkplanning.nps.gov/*add shortlink name, or by mail to:

National Park Service
Golden Gate National Recreation Area
Attn: Commercial Dog Walking
Fort Mason, Building 201
San Francisco, CA 94123

For Further Information Contact:

XXXX

Purpose and Need

This action is a direct response to commercial dog walking permit programs recently enacted by the San Francisco Board of Supervisors and the Town of Tiburon in Marin County which will be in effect in July 2013, and which will limit the number of dogs per dog walker to 8 or 6 dogs, respectively. Given the extremely broad geographical reach (parks, open spaces, Port lands, and

¹ GGNRA's Compendium is a listing of all park closures and use limits within the GGNRA.

PUC properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the NPS reasonably anticipates that a number of commercial dog walkers, who would otherwise use areas that would cause them to fall under these ordinances, will instead walk their dogs in areas under the administrative jurisdiction of the NPS in San Francisco and Marin Counties that are already regularly used by dog walkers, including many commercial dog walkers.

Although the GGNRA dog management planning project which addresses commercial dog walking is well underway, a final rule is not anticipated until 2015. In the absence of a final rule, commercial dog walkers are not regulated and are able to walk an unlimited number of dogs at GGNRA park sites where dog walking is currently allowed. Thus commercial dog walkers using NPS Marin and San Francisco sites could avoid the permit fees, requirements, and limit on the number of dogs they may walk on San Francisco and Tiburon lands covered by the new local ordinances.

Background

Commercial dog walkers have been using GGNRA's San Francisco and Marin sites for at least ten years. During that time, the GGNRA dog management planning process had already begun, and the decision as to whether commercial dog walking should be permitted on GGNRA lands was deferred to the dog management planning process and its accompanying NEPA analysis and rulemaking. Over the past ten years, the number of commercial dog walkers in San Francisco and Marin has increased. Research and interviews for the draft dog management plan/EIS indicate that there are now at least 100 commercial dog walkers in the city, although there are also commercial dog walkers who do not have a business license and are not listed in the phone book. Many of these dog walkers are single individuals (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco (Prodog). In San Francisco, commercial dog walkers most often use GGNRA's Fort Funston and Crissy Field, but are also seen at Fort Mason, Baker Beach and Ocean Beach. Commercial dog walkers typically bring between four and ten dogs or more at a time to GGNRA sites and spend about one hour, twice a day, in the park.

The San Francisco ordinance is anticipated to have a noticeable impact, particularly at Fort Funston and Crissy Field, the two sites most regularly used by dog walkers. Crissy Field already receives very high visitor use (approximately 3.2 million in 2009), including from individual and commercial dog walkers. GGNRA staff estimates that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays), and typically at least three present, with at least four to six dogs each, at any given time of the day. A 2011 Visitor Use Study (Appendix D) found that 24% of visitors at Crissy Field were dog walkers. That same study found that at Fort Funston, an average of 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends), and that on weekdays, 50% of the dogs observed were in groups of five or more dogs, with approximately 15% in groups of ten or more dogs. The 2009 visitation at Fort Funston was estimated at 546,000.

Marin County Parks and Open Space began requiring permits for commercial dog walkers on Open Space lands in 2002; the permits allowed a maximum of 6 dogs per walker. Currently, certain GGNRA-managed sites in southern Marin are used by commercial dog walkers with

more than six dogs per person; dog walkers with six or more dogs have been seen at both Rodeo Beach and the Alta Trail above Marin City. The Alta Trail is regularly used by commercial dog walkers who have an average of ten dogs per walker. GGNRA staff have often experienced up to 50 off-leash dogs at one time on the Alta Trail.

The preferred alternative for GGNRA's draft dog management plan currently requires that commercial and private dog walkers with more than three dogs must obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites. However, the preferred alternative may change in light of public comment received on the supplemental EIS and Notice of Proposed Rulemaking. Also, a number of steps remain before a final regulation for dog walking in GGNRA could be promulgated. A Supplemental EIS for the draft dog management plan will be released for public comment in summer 2013. A Notice of Proposed Rulemaking will be released in 2014 for an additional public comment, with a final rule anticipated in 2015. In the absence of that final rule, commercial dog walkers are not regulated and thus may walk unlimited number of dogs at GGNRA park sites.

The maximum number of dogs per commercial dog walker in this proposed interim compendium amendment was drawn from the permit conditions for commercial dog walkers developed in the dog management planning process. The permit conditions for commercial dog walkers in the preferred alternative of the draft dog management plan/EIS (draft plan/EIS), including the number of dogs allowed per dog walker, were developed initially by the GGNRA Negotiated Rulemaking Committee for dog management, and further developed in draft Plan/EIS. During the public comment period on the draft Plan/EIS, the National Park Service (NPS) received multiple comments regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the number at six dogs with strict guidelines. Other commenters, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker, with some noting that four or more dogs could be hard to control. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of dogs to a maximum of six, while other commenters requested that commercial dog walking not be allowed at all.

In establishing the maximum number of dogs per walker in the draft plan/EIS, the NPS was concerned first and foremost with resource protection and visitor experience and safety, two key objectives of the draft plan/EIS. The NPS questioned whether a dog walker could consistently control more than six dogs in areas open to voice control, particularly in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. The NPS was unable to find literature supporting the idea that more than six dogs would not damage park resources or impact visitor experience and safety, or put another way, would provide both resource protection and visitor experience and safety. Based on public comment, feedback from the GGNRA Negotiated Rulemaking Committee for dog management, park staff observations and research, and law enforcement experience, the NPS believes that allowing more than six dogs total could negatively impact visitor experience and visitor and employee safety. Thus the maximum of 6 dogs per commercial dog walker is

proposed in this interim compendium amendment, consistent with the draft plan/EIS, for protection of resources and visitor and employee safety.

Applicable Law and Policy:

This proposed interim Compendium amendment appropriately regulates a commercial activity on National Park Service lands, as required by 36 CFR § 5.3, Business Operations and per the guidance of Section 8.1, Use of the Parks, of the National Park Service Management Policies 2006.

This action allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other park users and park resources. Further, commercial dog walking was not addressed by the 1979 GGNRA Citizen's Advisory Pet Policy (Attachment C), and has not ever been a permitted activity in the park. As stated previously, at the time that the park became aware of this new use of park areas, the GGNRA dog management planning process had already begun, and the decision as to whether commercial dog walking should be permitted on GGNRA lands was deferred to the dog management planning process and its accompanying NEPA analysis and rulemaking.

Under 36 C.F.R. Section 1.5, superintendents are authorized to take action to protect park resources. In both emergency and non-emergency situations, park superintendents may adopt compendium provisions that impose conditions or restrictions on a use or activity. As stated above, this interim compendium amendment is necessary to protect public and employee health and safety during the time between the enacting of two local ordinances that will restrict commercial dog walking on adjacent public lands, and the promulgation of a final rule for dog walking in GGNRA which will include restrictions and a permit requirement on commercial dog walkers. This interim compendium amendment allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other park users and park resources. This action will also serve to minimize conflict among visitors by enabling greater control of their dogs by commercial dog walkers.

In that this interim action is based in a proposal for commercial dog walking developed with much public input during the GGNRA dog management planning effort, and that the proposed regulatory provisions are the minimum level acceptable to meet the park's management obligations with regard to the protection of visitor and employee safety and park resources, this is not anticipated to be a highly controversial nature.

Finally, this interim action would result in minor changes to commercial dog walking activities in the park. This action is not expected to displace commercial dog walkers to adjacent lands managed by other agencies in Marin, which already have similar restrictions on commercial dog walking. In San Francisco, there may be some commercial dog walkers who prefer to use City and County of San Francisco lands, in that they would be allowed an additional 2 dogs per walker under the San Francisco permit. However, that minimal difference is not expected to result in a significant amount of displacement from GGNRA lands to San Francisco-managed sites.

Decision / Implementation Process

This proposal will be released for a 30-day public review and comment period. Following the public comment period, NPS will review all substantive comments received. After considering public comment, the GGNRA Superintendent will make an informed decision on whether or not to implement the proposal. If implementation is approved, a decision document signed by the Superintendent would be released, GGNRA's Compendium would be amended and the public would be notified through community outreach, outreach to dog walking organizations, brochures and the Park's website.

EQD Communications with SES

NEPA

1. **Doc Review:**

Per our discussion--you may choose to hold this until June 12th, or post now for review. These should be familiar to most people who deal with NEPA documents and DO-12. They are not precise definitions and do not have to be. They are instead indications of context, duration and magnitude of impact, per NEPA, CEQ and DO-12. They help the reader understand if the impact to a particular resource, given the action, is little or big, and would be short or long-term. They also help NPS determine if there is potential for impairment. (Recall the DO-12 training).

If there are major substantive disagreements on these thresholds, then Heidi and the subcontractors should not proceed with impacts of the no action alternative, which was due awhile ago, but put on hold. So, as soon as you can confirm when the park will have comments in on this product (and the other two, per our conversation today), Michael and I can work on the revised schedule.

2. **Current conditions info:** Michael just brought up a good point that not all park users will be represented on the technical subcommittee, so there may have to be people assigned to get the information from others, or the full committee may need to be asked these questions.
3. **Agency Scoping:** the agency scoping letter would also be helpful to clarify what NEPA agency involvement is vs. regneg...

This needs a bit of work....but I'm tied up the rest of the day. You could look on the N drive for the agency scoping letter we used for the South Florida/Caribbean plan/EIS. At a minimum, it needs to explain....

- we are doing the EIS in conformance with NEPA and DO-12....
- public scoping was completed
- EIS purpose and need (and enclose the public scoping brochure)
- more info on PEPC
- purpose of agency scoping
- NOI was published on....
- Options for participation if they can't attend the meeting

Not necessarily in this order, but this is suppose to be a record of initiating formal agency scoping and beyond.

4. **Maps:** (info to EQD from Craig Scott) It was a simple misunderstanding. When I'm asked for GIS files, the first question I always ask in return is "can somebody there actually use GIS files?" We mistakenly thought the answer was yes. As you can see, they're quite useless without the software and training. So you really want

a series of maps. Jpeg or Pdf format. Not a problem. Next week, after Tuesday, we can talk about exactly what you need. In the meantime, can you think about these questions?

- Printed map size? 8 1/2x 11", 11x17", 22x34".....What size can you print? Will it be published?
- Geographic Extent? What kind of detail can be shown on a parkwide scale? GGNRA is a long, odd shape with many separate areas and densely urban areas.
- What information should be consistent to all maps/base map?
- What information should be grouped? Enough to show patterns not too much clutter.
- Who is the audience? Are they familiar with GGNRA? The less familiar, the more labelling necessary. Labelling takes the greatest amount of time in map creation. With a GGNRA savvy audience, airphotos convey a great deal of information.

Sounds good. We'll actually have a contractor here next week who hopefully will be on board soon to interface with you on maps for internal team analysis/planning work vs. maps for the actual public document (which won't be out for at least a year)

5. **LE Date Source** :Shirwin and I discussed the information submitted last year (July 2005), and resubmitted during the NEPA EIS public scoping period by CBD (CBD submitted the petition last year on behalf of a number of groups). There is information submitted in the petition as well as in the exhibits that may be very useful for NEPA planning purposes. There is information in the petition and exhibits concerning visitor experience, human health and safety, conflicts, animal welfare, etc. We are going to post the documents up on an ftp site on Monday after EQD discusses the best way to organize the exhibits electronically.

Shirwin will get a read from Mary Beth (LE) and others as to the validity of the information summarized in the petition and presented in the exhibits. Much of this information appears to have come from the park's records (FOIA'd) and if it was accurately summarized, may solve our more immediate needs for LE and "visitor conflict" information. There may be other data needs, but this appears to be a very good start.

So, we'll send out an email when the docs (petition and exhibits) are posted. (Heidi...Shirwin said the petition itself is up on the CBD website).

REG NEG

1. We really don't want this to go out without a more focused discussion with the neutrals on how it is to be used. We don't understand what the column is for "criteria," for example. In further discussions with NPS folks who tried to do neg reg and not integrate with NEPA, all said in hind-sight, it was a flaw. We don't have, from the NEPA side, "criteria" fleshed out yet and pushing the committee to do this ahead of our process and understanding of it may lead to further problems. Barbara Goodyear raised questions about this at our meeting with the park. If you want to wait until Chris returns, or have a discussion in advance of her return, that is fine, but either way, we would like you to hold off on doing anything further without a discussion with EQD, park, Greg and/or Mike.
 - Got your message. Sounds like you and Greg went ahead and talked. Michael's email is not functioning until Wednesday. In terms of sending the matrix out without the criteria column until we, as a team, understand what the term "criteria" means, that sounds reasonable. That's really what we were getting at. Also, yes, let's have a discussion with IECR (including Mike Eng) about how this integrated process is suppose to work, understanding we are breaking a bit of new ground here for NPS. We were under the impression that one of the reasons (criteria) used to select the facilitators was they were open to an integrated process, so a bit of planning and discussion about next steps would seem very appropriate rather than on a product by product, chart by chart basis.
 - We would like to have Heidi in on that discussion as well, so it would have to be after she returns from Mexico.
2. When I spoke to Greg Bourne re: the issues and interests matrix, also briefly mentioned your interest in getting input from the committee members re: current conditions through the current conditions matrix and list of questions. He thought that was great and it would be good to discuss with you when/how to proceed with that.
 - I thought the way Greg wanted to proceed with this was to get the sub committee involved at their first get together and hash out the information or ways to get the information? The information in the (data needs) chart is really more of a compilation of what the full committee reported (and Mike recorded on the flip charts) combined with the NEPA needs, with what we heard various committee members say they could provide, so with the help of the facilitator (Greg and/or Mike), the subcommittee could tackle this. Sounds like we could use a call this week with Greg if needed?
3. Interesting. Can we put this on the agenda when we talk with Greg? We are trying to learn more about how this works re structure, content, substance to

potentially apply to other parks. For example, does the planning committee do a review of meeting materials (handouts?) prior to the meeting? Thanks

COMPENDIUM AMENDMENT

(Version date: 11/13/2013)

PART 1 – General Provisions

36 CFR § 1.6 Permits

COMMERCIAL DOG WALKING

- (a) The walking of more than six dogs at one time by any one person for consideration (commercial dog walking) is prohibited within San Francisco County and Marin County sites administered by Golden Gate National Recreation Area (GGNRA).
- (b) The walking of more than three dogs, with a limit of six dogs, at one time by any one person for consideration (commercial dog walking) within San Francisco County and Marin County sites administered by GGNRA, where dog walking is otherwise allowed, is hereby authorized provided that:
 - i. That person has a valid commercial dog walking permit issued by GGNRA;
 - ii. The walking of more than three dogs, with a limit of six dogs, is done pursuant to the conditions of that permit; and
 - iii. The commercial dog walker badge issued to the permittee by GGNRA shall be visibly displayed at all times as directed in the permit while the permittee is engaging in commercial dog walking activities, and shall be provided upon request to any person authorized to enforce this provision.

**DRAFT – PREDECISIONAL DOCUMENT –
NOT FOR PUBLIC DISTRIBUTION**

**COMPENDIUM AMENDMENT
(Version date: 11/13/2013)**

PART 1 – General Provisions

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 - ii. The walking of more than three dogs, with a limit of six dogs, is done pursuant to the conditions of that permit; and
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United States Department of the Interior

National Park Service
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, California 94123

Form 10-114
Rev. Jan. 00

SPECIAL USE PERMIT

Name of Use: **Commercial Dog Walking**

Date Permit Reviewed 2013
Expires 2014
Permit No. 8140-2501-XX-####

Name Of Area: **XXXXXX**

Long Term
Short Term

NATIONAL
PARK
SERVICE

**NAME
ADDRESS
PHONE
EMAIL**

NAME is hereby authorized during the period on **DATE from Sunrise to Sunset** to use the following described land or facilities in the above named area:

For the purpose(s) of:

Commercial Dog Walking in GGNRA San Francisco and Marin sites currently open to dog walking.

Authorizing legislation or other authority (see DO-53): 36 CFR 1.6.

NEPA & NHPA Compliance: CATEGORICALLY EXCLUDED EA/FONSI EIS OTHER APPROVED PLANS

PERFORMANCE BOND: Required Not Required Amount \$0

LIABILITY INSURANCE: Required Not Required Amount \$2,000,000.00 aggregate/\$1,000,000 per occurrence.

ISSUANCE of this permit is subject to the conditions on the reverse hereof and appended pages and when appropriate to the payment to the U.S. Dept. of the Interior, National Park Service of the sum of \$375 which includes \$75 for the application fee and \$300 for the badge fee.

The undersigned hereby accepts this permit subject to the terms, covenants, obligations, and reservations, expressed or implied herein.

Permittee: _____
Signature Organization Date

Authorizing Official: _____
Signature Title Date

GENERAL CONDITIONS

1. The permittee is prohibited from giving false information; to do so will be considered a breach of conditions and be grounds for revocation: [36 CFR 2.32(a)(3)].
2. The permittee shall exercise this privilege subject to the supervision of the Superintendent or designee, and shall comply with all applicable Federal, State, county and municipal laws, ordinances, regulations, codes, and the terms and conditions of this permit. Failure to do so may result in the immediate suspension of the permitted activity or the termination of the permit.
3. If any provision of this permit shall be found to be invalid or unenforceable, the remainder of this permit shall not be affected and the other provisions of this permit shall be valid and be enforced to the fullest extent permitted by law.
4. The permittee is responsible for making all necessary contacts and arrangements with other Federal, State, and local agencies to secure required inspections, permits, licenses, etc.
5. Failure to comply with any of the terms and conditions of this permit may result in the suspension or revocation of the permit. Permittee will reimburse NPS for cleanup or repair of damages required to be made by NPS staff or contractor in conjunction with a terminated permit.
6. This permit may be revoked at the discretion of the Superintendent upon 24 hours notice, or without notice if damage to resources or facilities occurs or is threatened, notwithstanding any other term or condition of the permit to the contrary.
7. This permit is made upon the express condition that the United States, its agents and employees shall be free from all liabilities and claims for damages and/or suits for or by reason of any injury, injuries, or death to any person or persons or property of any kind whatsoever, whether to the person or property of the Permittee, its agents or employees, or third parties, from any cause or causes whatsoever while in or upon said premises or any part thereof during the term of this permit or occasioned by any occupancy or use of said premises or any activity carried on by the Permittee in connection herewith, and the Permittee hereby covenants and agrees to indemnify, defend, save and hold harmless the United States, its agents, and employees from all liabilities, charges, expenses and costs on account of or by reason of any such injuries, deaths, liabilities, claims, suits or losses however occurring or damages growing out of the same.
8. Permittee agrees to carry general liability insurance against claims occasioned by the action or omissions of the permittee, its agents and employees in carrying out the activities and operations authorized by this permit. The policy shall be in the amount of \$2,000,000 and underwritten by a United States company naming the United States of America as **additionally insured**. The permittee agrees to provide the Superintendent with a Certificate of Insurance with the proper endorsements prior to the effective date of the permit.
9. Permittee agrees to deposit with the park a bond in the amount of \$0 from an authorized bonding company or in the form of cash or cash equivalent, to guarantee that all financial obligations to the park will be met, including the restoration and rehabilitation of the permitted area.
10. Costs incurred by the park as a result of accepting and processing the application and managing and monitoring the permitted activity will be reimbursed by the permittee. Administrative costs and estimated costs for activities on site must be paid when the permit is approved. If any

additional costs are incurred by the park, such as costs resulting from cliff rescues or other extraordinary events, the permittee will be billed at the conclusion of the permit. Should the estimated costs paid exceed the actual costs incurred; the difference will be returned to the permittee.

11. The person named on the permit as in charge of the permitted activity on-site must have full authority to make any decisions about the activity and must remain on-site at all times. He/she shall be responsible for all individuals, groups, vendors, etc. involved with the permit
12. The permittee represents and it is a condition of acceptance of this permit that, pursuant to 41 U.S. C. 22, "No Member of Congress shall be admitted to any share or part of any contract or agreement made, entered into, or accepted by or on behalf of the United States, or to any benefit to arise thereupon."
13. Nothing herein contained shall be construed as binding the Service to expend in any one fiscal year any sum in excess of appropriations made by Congress or administratively allocated for the purpose of this permit for the fiscal year, or to involve the Service in any contract or other obligation for the further expenditure of money in excess of such appropriations or allocations.
14. This permit may not be transferred or assigned without the prior written consent of the Superintendent.

APPENDIX I: SPECIAL PARK CONDITIONS

1. A permit is required for any commercial dog walker with 4 to 6 dogs. Commercial dog walkers with 7 or more dogs are not permitted within GGNRA's San Francisco and Marin sites where dog walking is allowed.
2. Permittee and its employees or other agents must provide proof of approved dog-handling training through existing training courses offered by organizations such as Marin Humane Society, SFSPCA or Peninsula Humane Society and SPCA. Proof of training must be returned with the permit application.
3. Permits are valid for 12 months from date of issue, and are not transferrable
4. Each dog must wear a current dog license and identification.
5. The Permittee and all participants authorized herein must comply with the conditions of this permit including all exhibits or amendments or written directions of the Superintendent. The Permittee shall ensure that all employees and/or agents entering GGNRA are informed of all conditions of this permit. The Permittee may be cited for any violations of the permit committed by their employee and/or agent while acting under this authorization.
6. The Permittee shall require its employees and other agents to display the badge provided by GGNRA that identifies them as a commercial dog walker at all times in a manner such that it is easily visible from a distance. Additionally, the badge must be produced for inspection upon request by an officer with law enforcement authority in areas administered by GGNRA.
7. The Permittee must clean up after any dogs being walked and properly dispose of any waste, as required by 36CFR2.15 on NPS lands.
8. The Permittee must abide by all National Park Service regulations, including - in GGNRA sites that are not open to voice-control dog walking per the 1979 Pet Policy (see Attachments A and B) - 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet.
9. All vehicles must be parked legally. Vehicle travel off pavement is not permitted, and access for other park visitors must not be impeded.
10. It is expressly understood that the Superintendent may impose public use limits based upon the authority stated in Title 36 of the Code of Federal Regulations, Section 1.5. Furthermore, it is understood that possession of this permit does not guarantee entry into GGNRA, and that entrance into or parking within GGNRA may be closed or restricted from time to time in response to crowded conditions or natural events. It is also understood that access to GGNRA and certain areas within GGNRA may be restricted in the future to protect resources and assure quality visitor experiences, or due to the implementation of special park projects.
11. The Permittee shall take every reasonable precaution to ensure the safety of its clients, its employees or agents, other GGNRA visitors, and GGNRA employees.
12. The Permittee and/or their agents shall exercise courtesy and consideration in their relations with the public and with NPS employees, volunteers or other agents. The Permittee and/or their agents will review and correct the conduct of any of its employees or volunteers whose actions or activities are considered by GGNRA to be inconsistent with the experience, enjoyment, and protection of visitors and stewards of public lands.
13. This permit is valid for GGNRA San Francisco and Marin sites where dog walking is allowed only, and is not valid for any other public lands.
14. The Permittee is not entitled to any preference to renewal of this authorization except to the extent otherwise expressly provided by law. This authorization is not exclusive and is not a concession contract.
15. The Permittee shall not construct any structures, fixtures or improvements within GGNRA.

16. Advertising for the authorized activity shall not state or imply endorsement by GGNRA or the National Park Service. Upon request, the Permittee will provide GGNRA with copies of advertising brochures and any other materials related to activities within GGNRA.

APPENDIX I, ATTACHMENT A: SPECIAL CONDITIONS FOR GGNRA SAN FRANCISCO LANDS

1. ***Areas Open For On Leash or Voice Control Dog Walking***

- Baker Beach, north of Lobos Creek
- Crissy Field (excluding the Wildlife Protection Area at the west end of Crissy field beach where leashes are required all year except from May 15 to July 1)
- Fort Funston (excluding the 12-acre closure in northwest Ft. Funston and the northern end of the Coastal trail, closed due to erosion.)
- Fort Miley
- Lands End
- Ocean Beach (excluding the Plover Protection Area from Sloat Blvd. north to Stairwell 21 where where leashes are required all year except from May 15 to July 1)

2. ***Areas Open For On Leash Dog Walking Only***

- All trails not closed to dogs
- All parking lots and picnic areas
- Fort Point lands, excluding inside the fort and the pier
- Fort Mason
- Sutro Heights

3. ***Areas Closed To Dogs***

IN THE CRISSY FIELD AREA

- Crissy Field Tidal Marsh and Lagoon

IN THE FORT FUNSTON AREA

- Fort Funston Habitat Protection Area
- Coastal Trail, intersection of Horse trail to Great Highway, closed due to erosion

IN THE FORT POINT AREA

- Fort Point (inside historic fort)
- Fort Point pier (Torpedo Wharf)

IN PRESIDIO AREA A

- Battery to Bluffs Trail
- China Beach site
- Lobos Creek
- Marshall Beach

APPENDIX I, ATTACHMENT B: SPECIAL CONDITIONS FOR GGNRA MARIN COUNTY LANDS

1. Areas Open For On Leash or Voice Control Dog Walking

- Alta Avenue between Marin City/Oakwood Valley
- Homestead Valley
- Muir Beach
- Oakwood Valley Fire Road, and Oakwood Valley Trail from junction with Oakwood Valley Road to Alta Avenue
- Rodeo Beach and South Rodeo Beach
- Three Marin Headlands trail corridors:
 1. Coastal Trail from Golden Gate Bridge to junction with Wolf Ridge Trail;
 2. Loop Trail from Rodeo Beach parking lot up Coastal Trail paved road (Old Bunker Road) near Battery Townsley and return to Rodeo Beach on paved road;
 3. Wolf Ridge Loop (Coastal Trail to Wolf Ridge Trail; Wolf Ridge Trail to Miwok Trail; Miwok Trail back down to Coastal Trail).

2. Areas Open For On Leash Dog Walking Only

- All parking lots and picnic areas
- County View Road and Marin Drive connector trails to North Miwok Trail
- Fort Baker
- Oakwood Valley Trail to the junction with Oakwood Valley Fire Road
- Rhubarb Trail
- Stinson Beach, parking lots/picnic areas only
- Four Marin Headlands Trail corridors:
 1. Coast Trail between Hill 88 (junction of Coastal Trail and Wolf Ridge Trail) and Muir Beach
 2. Miwok Trail between Tennessee Valley parking lot and Highway 1 (North Miwok Trail)
 3. Fire road around Battery Smith-Guthrie
 4. Trail to South Rodeo Beach

3. Areas Closed To Dogs
IN THE FORT BAKER AREA

- Chapel Trail
- Fort Baker Pier

IN THE MARIN HEADLANDS AREA

- Alta Trail (only between Oakwood Valley trail intersection and Wolfback Ridge Road)
- Bicentennial Campground
- Bobcat Trail
- Coyote Ridge Trail
- Dias Ridge Trail
- Fox Trail
- Green Gulch Trail
- Hawk Campground and Trail
- Haypress Campground and Trail
- Kirby Cove area
- Lower Fisherman Trail and Beach
- Marincello Road
- Middle Green Gulch Trail
- Miwok Cutoff Trail
- Miwok Trail, between Wolf Ridge and Bobcat Trail
- Morning Sun Trail

- Old Springs Trail
- Point Bonita Lighthouse Trail
- Rodeo Avenue Trail
- Rodeo Beach Lagoon
- Rodeo Lake
- Rodeo Valley Trail
- SCA Trail
- Slacker Hill Trail
- Tennessee Valley beach
- Tennessee Valley Trail from parking lot to beach
- Upper Fisherman Trail and beach

IN THE MUIR BEACH AREA

- Big Lagoon
- Owl Trail
- Redwood Creek

IN THE MUIR WOODS AREA

- Muir Woods National Monument
- Redwood Creek Trail

IN THE STINSON BEACH AREA

- Coast Trail
- Dipsea Trail
- Matt Davis Trail
- McKennan Trail
- Willow Camp Fire Road
- Stinson Beach (beach only)

**Intergovernmental AGREEMENT
BETWEEN
U.S. Institute for Environmental Conflict Resolution
AND
CALIFORNIA STATE UNIVERSITY, SACRAMENTO**

THIS AGREEMENT, made and entered into this _____ day of _____, _____ by and between the U.S. Institute for Environmental Conflict Resolution, a federal agency, hereinafter called "the U.S. Institute", and California State University, Sacramento, on behalf of the Center for Collaborative Policy (CCP), hereinafter called "CSUS," an institution of higher education.

WITNESSETH

WHEREAS, the U.S. Institute will assist the Golden Gate National Recreation Area (GGNRA) to neutrally assess the feasibility of successful multi-stakeholder collaboration and to potentially design, convene and facilitate a negotiated rulemaking process for pet management within GGNRA, hereinafter referred to as "Project", and;

WHEREAS, the U.S. Institute is requesting professional services from CCP, a University Department, to co-lead the Project's Phase I Assessment and Preliminary Process Design, in conjunction with CDR Associates, in accordance with the attached Exhibit "A", Statement of Work; and

WHEREAS, it is understood that CCP is responsible to this Project in its shared participation with CDR Associates to the extent the level of effort has been defined by the Exhibit B, Budget, and;

WHEREAS, CSUS is interested in providing such professional services as described by Exhibit A;

NOW, THEREFORE, in consideration of the covenants, conditions and stipulations as expressed herein, and in consideration of the mutual benefits to be derived therefrom, the parties hereto agree to the provisions of the attached exhibits, as identified below:

| | |
|--|---------|
| Exhibit A – Statement of Work | 4 pages |
| Exhibit B – Assessment Budget Summary | 1 page |
| Exhibit C – Special Terms and Conditions | 5 pages |
| Exhibit D – Invoice Template | 1 page |

It is understood and agreed that neither this Agreement, amendments, modifications, nor termination thereof, shall be effective until approved and signed by both parties to the Agreement.

It is further understood that this Agreement may be cancelled by either party by giving 15 days written notice to the other party. In the event of cancellation, any work performed by CSUS shall be compensated for at date of termination.

IN WITNESS THEREOF, the parties have executed this Agreement upon the date hereof.

**U.S. Institute for
Environmental Conflict Resolution**

California State University, Sacramento

Kirk Emerson
Director

David Shannon, Manager
Procurement/Contract Services

Date: _____

Date: _____

EXHIBIT A --SCOPE OF WORK

“Golden Gate National Recreation Area (GGNRA) Dog Management Negotiated Rulemaking Assessment”

PROJECT BACKGROUND

Federal regulations [36 CFR 2.15(a)(2)] require that all pets, where allowed in national park sites, are to be crated, caged or restrained at all times. However, in 1979 the GGNRA Advisory Commission recommended a pet policy to park management establishing locations and criteria for “voice control” (meaning off leash) areas for dogs. The park operated under this policy for more than twenty years, before it was determined to be contrary to federal regulations. On January 23, 2001, the GGNRA Advisory Commission acknowledged that the 1979 “voice control” policy was null and void. Many dog walkers in GGNRA continue to walk with dogs off-leash and do not comply with the current regulations.

Several recent events underscore the need for revising dog management in GGNRA, including increased visitation to the park, dramatic increases in dog ownership in the San Francisco Bay Area, litigation concerning dog use in the Fort Funston area of GGNRA, public concern about visitor and pet safety, management issues involving wildlife and vegetation protection, and the GGNRA Advisory Commission’s review of dog-walking issues.

In January 2002, GGNRA published an Advanced Notice of Proposed Rulemaking (ANPR) in the Federal Register seeking public response to options presented for pet management in GGNRA – 8580 comments were received. In August and September 2002, a panel of senior NPS officials was convened to review the extensive public comment, other technical information – including a telephone survey and a compilation of ANPR comments completed by Northern Arizona University – as well as pertinent NPS directives, policies and regulations. The panel recommended that off-leash use in GGNRA may be appropriate in selected locations where park resources will not be impaired if the standards for appropriate use (as defined by NPS policies and regulations) can be met and if public safety incidents and public use conflicts can be appropriately managed. The panel further recommended that the park pursue both rulemaking and comprehensive planning for pet management to address suitable locations and proper management strategies. The GGNRA Superintendent concurred with the recommendations and forwarded them to the NPS Director, also suggesting that the process of negotiated rulemaking would provide the greatest chance of achieving a successful resolution to this management issue.

The NPS Director agreed with the recommendation and directed the park to move forward with a negotiated rulemaking process. That decision was announced to the public at a press conference on October 21, 2003.

Due to the U.S. Institute’s role as an independent federal agency established to impartially provide environmental conflict resolution services, GGNRA has sought the assistance of the U.S. Institute to neutrally assess the feasibility of successful multi-stakeholder collaboration and to potentially design, convene, and facilitate a negotiated rulemaking process. The U.S. Institute will provide these services, in part, through this contract.

SCOPE OF WORK

The Center for Collaborative Policy (Contractor) shall assure that Greg Bourne will work in a co-lead role with J. Michael Harty of CDR Associates, who will also be a U.S. Institute contractor, in providing professional services to complete the following Phase I tasks. Furthermore, Greg Bourne and other assigned Center for Collaborative Policy staff will also work in a highly collaborative

manner with the U.S. Institute's designated Project Manager and all other members of the neutral team assembled by the U.S. Institute.

Authorization to proceed with possible subsequent phases will be contingent on the outcome of the assessment process, availability of funding, satisfactory performance of the Contractor, and concurrence of the participating stakeholders.

The U.S. Institute, through its designated Project Manager, will provide project management, oversight, and consultation to the Contractor.

The Contractor shall perform the following tasks:

PHASE I – Situation Assessment and Preliminary Process Design

I-1 Organizational Meeting and Review of Background Information. The Contractor will participate in an initial organizational meeting with GGNRA staff, co-lead J. Michael Harty, and the U.S. Institute's project manager to establish mutual expectations regarding their respective roles and responsibilities and to clarify the legal, policy, and procedural parameters for the process. The third-party neutral(s) will review relevant background information regarding the dog management controversy.

I-1a Travel to Organizational Meeting. This task covers anticipated travel requirements for the CCP team to the San Francisco Bay area in support of Task 1-1 above.

I-2 Interview Protocol and Letter of Introduction. The Contractor will develop an interview protocol and letter of introduction to assessment participants.

I-3 Identify and Contact Individuals to be Interviewed. The Contractor will work closely with GGNRA staff to identify key parties who are likely to have a strong interest in participating in the negotiated rulemaking process, including those who play key roles relevant to the controversy and those with important information or expertise needed to inform the discussion. Since parties may initially be identified as individuals, organizations, government agencies, or by potential roles, the neutral team may need to consult with groups and individuals to identify the most appropriate individuals to contact for the assessment process.

I-4 Schedule and Conduct Confidential Interviews. The Contractor will schedule and conduct up to 30 confidential individual and/or group interviews with the identified stakeholder representatives, as well as GGNRA staff. The interviews will be used to gain an understanding of the most important issues, concerns, and constraints of NPS and of the different stakeholder interest groups with respect to dog management. In addition, the interviews will seek to identify possible common interests that could potentially serve as a foundation for crafting broadly supported solutions. The interviews will also explore the feasibility of convening a productive negotiated rulemaking process and the appropriateness of different design options.

I-4a Travel to Interviews. This task covers anticipated travel requirements for the CCP team to the San Francisco Bay area in support of Task 1-4 above.

1-5 Confer with Community Dispute Resolution Organizations. The Contractor will identify and confer with community dispute resolution organizations in the San Francisco Bay Area regarding their interest and capacity to partner with the U.S. Institute's team on this project in providing dispute resolution services. Of particular interest would be the possibility of developing a cadre of community-based mediators who might be available to assist with facilitation of Working Groups during the proposed Negotiated Rulemaking process, or in helping to resolve community conflicts that may arise during the implementation of the agreed upon solution.

I-6 Prepare Draft and Final Assessment Report. The Contractor will participate in a meeting with GGNRA staff to review and discuss the findings and preliminary analysis of the assessment interviews and meetings with local community dispute resolution organizations. The Contractor will then prepare a draft Assessment Report that 1) summarizes the scope of relevant issues and concerns identified; 2) clarifies and neutrally describes the range of perspectives on these issues; 3) identifies areas of potential agreement and shared interests; 4) evaluates the feasibility of a productive negotiated rulemaking process, including a recommendation regarding whether or not to proceed and an assessment of conditions for success; and 5) if appropriate, proposes design options for moving ahead with an effort, possibly involving assistance from local community dispute resolution organizations. Contractor will seek feedback from stakeholders via phone calls in developing and refining the draft and final Assessment Report. The Contractor will provide an initial draft Assessment Report to the U.S. Institute for review in advance of its distribution to GGNRA for their comments. The contractor will revise the draft Assessment Report as appropriate based on comments from GGNRA and in consultation with the U.S. Institute. The final Assessment Report will be the independent work product of the contractors on behalf of the U.S. Institute. The final Assessment Report will be provided in electronic format to the U.S. Institute and GGNRA for posting on their websites. GGNRA will be responsible for the logistics in distributing the final Assessment Report to all of those interviewed.

I-6a Travel to GGNRA to discuss preliminary findings and analysis

I-7 Meeting to Consider Outcomes of Assessment Process, Determine Next Steps, and Follow-Up. The Contractor will meet with staff from GGNRA and the U.S. Institute's project manager to consider the outcomes of the assessment process and their implications for moving forward with a negotiated rulemaking process. Should the decision be in favor of proceeding, the form and process for doing so will be jointly determined, drawing on proposed design options in the Assessment Report and considering the requirements of the Federal Advisory Committee Act (FACA). Contractor will conduct additional follow-up on process design refinement and convening as the budget allows.

I-7a Travel to GGNRA to discuss assessment outcomes and determine next steps

NOTE: The U.S. Institute and GGNRA may solicit feedback from participants in the assessment process and jointly evaluate the performance of the contractor at the conclusion of Phase I. Authorization to proceed with work on subsequent phases will be contingent on the outcome of the assessment process, availability of funding, satisfactory performance of the contractor, and concurrence of the participating stakeholders.

PROJECT SCHEDULE AND MILESTONES

Phase I of the project will be conducted from April thru September 2004. If subsequent phases are authorized by written modification to this contract, the term of the entire project will extend until September 2005.

The following schedule of project milestones is anticipated:

PHASE I

- Organizational Meeting with U.S. Institute and GGNRA – early April 2004
- Conduct Situation Assessment – May thru June 2004
- Write Assessment Report – July 2004
- Issue Final Assessment Report – August 2004
- Refine Process Design/Develop Work Plan –August & September 2004 (as budget allows)

Subsequent Phases (to be determined)

- Select Members of Negotiated Rulemaking Committee – September/October 2004
- Conduct Negotiated Rulemaking Process – March 2005 thru August 2005
- Distribute Draft Negotiated Rulemaking Report – June 2005
- Release Final Negotiated Rulemaking Report – September 2005

DELIVERABLES AND DUE DATES

The following deliverables are required with the contract. The due dates are current estimates and will be determined at the conclusion of the interviews.

- Draft Assessment Report to the U.S. Institute – July 16, 2004
- Draft Assessment Report to GGNRA – July 23, 2004
- Final Assessment Report to the U.S. Institute and GGNRA – August 6, 2004

NOTE: A required condition of all U.S. Institute contracts with neutral practitioners is cooperation in completing a questionnaire designed to help evaluate projects at their conclusion.

EXHIBIT C

SPECIAL TERMS AND CONDITIONS

1. Points of Contact:

For U.S. Institute for Environmental Conflict Resolution

Administration

Phil Lemanski, Chief Financial Officer
130 S. Scott Ave.
Tucson, AZ 85701

Phone # (520) 670-5299
Fax # (520) 670-5530
e-mail: lemanski@ecr.gov

Technical

Michael Eng, Senior Program Manager
130 S. Scott Ave.
Tucson, AZ 85701

Phone # (520) 670-5299
Fax # (520) 670-5530
e-mail: eng@ecr.gov

For CSUS:

Administration

Rayma Forrest, Contracts Manager
Center for Collaborative
Policy
1303 J Street, Suite 250
Sacramento, CA 95814

Telephone: (916) 341-3325
FAX: (916) 445-2087
E-mail: rforrest@ccp.csus.edu

Technical

Greg Bourne, Project Manager
Center for Collaborative
Policy
1303 J Street, Suite 250
Sacramento, CA 95814

Telephone: (916) 445-2079
FAX: (916) 445-2087
E-mail: gbourne@ccp.csus.edu

2. Period of Performance

The period of performance of this Agreement is April 1, 2004 through September 30, 2004.

3. Maximum Amount Payable

The maximum amount of this time and materials Agreement is \$41,621.63. No further amounts are payable without bilateral agreement to the changes and incorporated by amendment in accordance with the Changes provisions of this Agreement.

4. Acceptance of Deliverables

When the Agreement calls for a product or report, the U.S. Institute agrees to notify CSUS Administrative Representative, in writing, within fifteen (15) working days of receipt of the product or report if it is unacceptable. If CSUS receives no such notification, it is assumed that the product or report is acceptable.

5. Invoicing and Payment

The compensation to be paid by the U.S. Institute to CSUS for the services rendered hereunder shall be based upon incurred time and actual expenses directly applicable to the project utilizing the rates established in Exhibit B, Budget. CSUS shall reference the contract

number on all invoices. Two (2) copies of invoices shall be submitted on a monthly basis for payment of charges in arrears.

Invoices shall include the following information:

- 1) Date of service provided
- 2) Reference to relevant task from Scope of Work
- 3) Brief description of service
- 4) Hours expended
- 5) Hourly rate charged
- 6) Amount charged to complete individual tasks
- 7) Direct costs
 - a. Date incurred
 - b. Reference to relevant task from Scope of Work
 - c. Brief description of expense
 - d. Per diem requested and location
- 8) Invoice total
- 9) Total labor to date
- 10) Total expenses to date
- 11) Authorized labor funds remaining
- 12) Authorized expense funds remaining
- 13) Total authorized funds remaining

CSUS shall list "per diem" costs as a direct expense based on the federal government's current rates for the San Francisco Bay area.

Direct costs will be reimbursed only if substantiated by valid receipts and shall not exceed the federal government maximums. All travel must be authorized in advance by the U.S. Institute. (A suggested invoice format is attached.)

CSUS can expect payment within 45 days of receipt of invoice by the U.S. Institute. Time of payment can be shortened by 5-7 days if CSUS authorizes electronic transfer and deposit of payments. To help ensure timely payment, CSUS shall inform the U.S. Institute if payment has not been received 30 days following submission of their invoice.

Invoice Remittance Address:

U.S. Institute for Environmental Conflict Resolution
Attn: Michael Eng
130 S. Scott Avenue
Tucson, AZ 85701

Electronic Funds Transfer information is available through the Central Contractor Registration (CCR) data base. The Center's DUNS number is: 029585622. Payments shall be remitted to the following address:

Accounts Receivable, LAS 1003
California State University Sacramento
6000 J Street
Sacramento, CA 95819-6010

Payable to: California State University, Sacramento

Undisputed invoices will be approved for payment within 45 days of receipt of invoice.

6. Budget Flexibility

It is understood that cost distribution within and between SOW tasks may be managed by CCP with the need for U.S. Institute approval as long as the proposed tasks do not exceed the total authorized project budget in this agreement.

14) Cancellation

The U.S. Institute may cancel or suspend all or any part of this order upon fifteen (15) days advance written notice. Upon receipt, CSUS shall stop all work, except for work specifically required for complying with the instructions in the cancellation notice. Payment shall be mutually agreed upon based on the percentage of the work satisfactorily performed, including work in process, which is required to close out the Agreement, and may include an adjustment for reasonable overhead and profit. The amount paid to CSUS shall not exceed the amount stated in Exhibit B of this Agreement.

8. Severability

If any provision of this Agreement is held invalid or unenforceable by any court of final jurisdiction, it is the intent of the parties that all other provisions of this Agreement be construed to remain fully valid, enforceable, and binding on the parties.

9. Applicable Law

Except where federal laws apply, the laws of the State of California shall govern the validity, interpretation and enforcement of this Agreement.

10. Independent Contractor

It is understood and agreed by the parties hereto that CSUS is an independent contractor and that no relationship of employer-employee exists between the parties hereto. CSUS's assigned personnel shall not be entitled to any benefits payable to employees of the U.S. Institute. The U.S. Institute is not required to make any deductions or withholdings from the compensation payable to CSUS under the provisions of this Agreement.

It is further understood and agreed by the parties hereto that CSUS in the performance of its obligation hereunder is subject to the control or direction of the U.S. Institute as to the designation of tasks to be performed, and the results to be accomplished but not the means, methods or sequence used by CSUS for accomplishing the results.

If, in the performance of this Agreement, any third persons are employed by CSUS, such persons shall be entirely and exclusively under the direction, supervision and control of CSUS. All terms of employment, including hours, wages, working conditions, discipline, hiring, and discharging, or any other terms of employment or requirements of law, shall be determined by CSUS.

It is further understood and agreed that as an independent contractor and not an employee or agent of the U.S. Institute, CSUS shall have no entitlement to act on behalf of the U.S. Institute in any capacity whatsoever as agent, or to bind the U.S. Institute to any obligation whatsoever, unless CSUS has been specifically authorized to negotiate legislation or enter into agreements on the U.S. Institute's behalf.

11. Authority of Contractor

It is understood and agreed that CSUS is to provide information, research, advice, recommendations and consultant services to the U.S. Institute. CSUS shall possess no

authority with respect to any U.S. Institute decision. The U.S. Institute is responsible for and shall make all policy decisions related to work of CSUS.

12. Insurance

CSUS is insured for its motor vehicle and liability exposures through a self-insurance program. During the term of this agreement, CSUS and all of its subconsultants shall fully comply with the requirements of the laws of the State of California respecting worker's compensation insurance. Said compliance shall include, but not be limited to, maintaining in full force and effect one or more policies of insurance against any liability CSUS may have for worker's compensation. Certificates and/or binders evidencing the maintenance of CSUS's insurance coverage shall be submitted to the U.S. Institute prior to commencement of work.

The provisions of this Section shall survive the expiration or termination of this Agreement.

13. Professional Services

CSUS agrees that the work hereunder shall be performed and completed in a professional manner and according to the professional standards observed by a competent practitioner of the profession in which CSUS and any sub-consultants are engaged. CSUS and the U.S. U.S. Institute agree that any confidential communications with parties may be protected by the provisions of the Administrative Dispute Resolution Act of 1996, 5 U.S.C. Section 574 which provides generally that neither a party nor a neutral shall disclose confidential communications made for the purposes of a dispute resolution proceeding, and that such communications may be exempt from disclosure under the Freedom of Information Act (5 U.S.C. §574(j)). Furthermore, outside parties shall have no right to any confidential information obtained or generated by the U.S. Institute or CSUS in connection with the services provided hereunder.

14. Subcontracts, Assignment

CSUS shall obtain prior written approval from the U.S. Institute before subcontracting any of the services delivered under this Agreement. CSUS remains legally responsible for the performance of all contract terms including work performed by third parties under subcontracts. Any subcontracting will be subject to all applicable provisions of this Agreement. CSUS shall be held responsible by the U.S. Institute for the performance of any subcontractor whether or not approved by the U.S. Institute.

15. Conflict of Interest

CSUS and CSUS's officers and employees and sub-consultants shall not have a financial interest, or acquire any financial interest, direct or indirect, in any business, property, or source of income that could be financially affected by or otherwise conflict in any manner or degree with the performance of services required under this Agreement.

16. Interpretation

This Agreement shall be deemed to have been prepared equally by both of the parties, and the Agreement and its individual provisions shall not be construed or interpreted more favorably for one party on the basis that the other party prepared it.

EXHIBIT D
INVOICE TEMPLATE
INVOICE

U.S. Institute for Environmental Conflict Resolution
130 Scott Ave.
Tucson, AZ 85701
Attn: Contractor Invoicing

Contractor Name & Address:

DUNS #:
Project Name:
Requisition Number: (Block 1 on SF 1449)
Order Number: (Block 4 on SF 1449)

Contract Number: (Block 2 on SF 1449)
Contractor Invoice Number:

Date of Invoice:
Billing Period:

| LABOR | | | | | | |
|----------------------------------|-------------|-------------|--------|-------------|----------|--------|
| Date | SOW Task | Description | Person | Hours | Rate | Amount |
| | | | | | | |
| | | | | | | |
| Labor sub-total | | | | | | |
| EXPENSES | | | | | | |
| Date | SOW Task | Description | Person | Per Diem | Location | Amount |
| | | | | ✓ | | |
| | | | | | | |
| Expenses sub-total | | | | | | |
| Invoice Total | | | | | | |
| Total labor to date | | | | | | |
| Total expenses to date | | | | | | |
| Authorized labor remaining | | | | | | |
| Authorized expenses remaining | | | | | | |
| Total authorized funds remaining | | | | | | |

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:
W48 (GOGA-VRPCR)

June 29, 2007

Memorandum

To: General Superintendent, Golden Gate NRA

From: Daphne Hatch, Chief of Natural Resource Management & Science
Yvette Ruan, Chief Ranger

Subject: Emergency Restrictions to Protect Western Snowy Plovers in the
Crissy Field Wildlife Protection Area and in the Ocean Beach Snowy
Plover Protection Area

Summary:

We recommend that you exercise the discretionary authority delegated to you under 36 C.F.R. Section 1.5 to adopt emergency regulatory provisions in the park's Compendium that would require all pets to be on leash in designated portions of Crissy Field and Ocean Beach. These restrictions are needed to protect the Western Snowy Plover, a species listed as threatened under the federal Endangered Species Act. This recommendation is based on data demonstrating that off-leash dogs in the two subject areas have detrimentally affected the Western Snowy Plover. This behavior by off-leash dogs poses a serious threat to the Western Snowy Plovers that overwinter in these two areas. During the 2006-2007 overwintering season, the park adopted identical emergency restrictions. An analysis of data from that season indicates that the restrictions helped to decrease the percentage of off-leash dogs on the beach during the plover overwintering season.

Although the park has prepared a draft rule for notice and comment in the Federal Register that would address snowy plover protection in these two areas during the overwintering season, the park has not yet received approval to publish the draft rule in the Federal Register. In the absence of a final rule, off-leash dog use would be permitted in these areas as a result of the U.S. v. Barley ruling. Therefore, an emergency exists necessitating the adoption of these restrictions for a second season to allow time for the Federal Register rulemaking process to conclude.

Recommended Regulatory Actions:

We recommend that you approve two Compendium Amendments specifically designed to protect the Western Snowy Plovers that overwinter in the Ocean Beach Snowy Plover Protection Area and the Crissy Field Wildlife Protection Area. The proposed text of the Compendium amendments is as follows:

- **Ocean Beach:** Dogwalking is restricted to on-leash only at Ocean Beach, Stairwell 21 to Sloat Boulevard, including all tidelands. The definition of on-leash use requires that dogs must be restrained on a leash which shall not exceed six feet in length.
- **Crissy Field:** Dogwalking is restricted to on-leash only in the Crissy Field Wildlife Protection Area which encompasses: from the west, starting at Fort Point Mine Depot (a.k.a. Torpedo Wharf) eastward to the concrete riprap, which lies approximately 700 feet east of the former Coast Guard Station, and includes all uplands and all tidelands and extends from the high-water mark to 100 yards off shore. The definition of on-leash use requires that dogs must be restrained on a leash which shall not exceed six feet in length.

If approved, these Compendium Amendments will remain in effect through this 2007-2008 overwintering season until monitoring determines the species is no longer present.

Emergency Compendium provisions were put in place to protect the Western Snowy Plover for the 2006/2007 overwintering season, as newly available data showed that off-leash dogs in the two subject areas were detrimentally affecting the Western Snowy Plover. These provisions were put in place 18 months after the U.S. vs. Barley ruling, which allowed off-leash dogwalking in several areas of the GGNRA.

During the time the Compendium provisions were in place, monitoring was ongoing to determine the status of the plover and the dates at which plovers were no longer present on Ocean Beach and Crissy Field. As a result of the monitoring, the provisions were lifted on Crissy Field on 5/1/07 and on Ocean Beach on 5/17/07. The public was notified through the park's website, dogwalking telephone hotline and via an email to the Negotiated Rulemaking Committee representatives.

Although park staff have initiated a rulemaking process (including public comment) to address Snowy Plover protection in the Crissy Field Wildlife Protection Area and Ocean Beach Snowy Plover Protection Area, the rulemaking process is not yet complete. The draft rule has been written and is being reviewed by NPS and Department of the Interior staff in Washington D.C.. Due to the expiration of last season's Compendium restrictions and the lengthy time period for a draft rule to receive Federal Register publication approval from the Department of the Interior, we are faced with a situation where off-leash dogwalking would occur in these two areas during the 2007-2008 overwintering season unless Compendium restrictions are readopted. Given the documented impacts to plovers from off-leash dogs, we recommend that the emergency Compendium regulatory provisions be readopted for this overwintering season.

We further recommend that long-term dog management options for these two areas be addressed in the Dog Management Plan/EIS and rule that the park is actively engaged in. The park is working with a Negotiated Rulemaking Committee, established by the Secretary of Interior, to reach consensus on dog management. The process will be accompanied by a Dog Management Plan/EIS and its accompanying rule in 2008. Addressing the Crissy Field Wildlife Protection Area and Ocean Beach Plover Protection Area in the EIS will allow for all options to be investigated and may result in the retention of the leash requirement or may result in the adoption of a different option.

Existence of Emergency:

The effect of the rulings in U.S. vs. Barley, CR-04-00408-WHA (N.D. Cal.), was to allow off-leash dog walking in several areas of GGNRA, including Ocean Beach and Crissy Field. Since the issuance of the Barley rulings, the GGNRA has continued to monitor Western Snowy Plovers at Ocean Beach and Crissy Field. In the fall of 2006, the park had accumulated sufficient data to analyze whether off-leash dog use in these areas had increased since the Barley rulings, and if so, whether that increase posed a threat to the Western Snowy Plover.

The November, 2006 *Status Report: Western Snowy Plovers – Recent Changes in Human and Dog Use within the Snowy Plover Protection Area at Ocean Beach and the Wildlife Protection Area at Crissy Field* (“Report”) analyzed monitoring data from the Ocean Beach Snowy Plover Protection Area and the Crissy Field Wildlife Protection Area and documented an increase in the number of off-leash dogs using the Ocean Beach SPPA and the Crissy Field WPA since the decision in U.S. v. Barley. Along with this increase in the number of off-leash dogs, there was an increase in the number of instances of dogs chasing or flushing Western Snowy Plovers or other shorebirds. In February and March of 2006, dogs were observed chasing or flushing Western Snowy Plovers on four occasions, disturbing a total of 22 plovers, in the Ocean Beach SPPA. In the Crissy Field WPA, dogs were observed chasing or flushing more than 6 plovers over the course of four surveys in July and August of 2006.

The Report described the adverse biological effects plovers experience when flushed or chased. The park concluded that these effects presented a serious threat to the Western Snowy Plover and immediate action, in the form of the 2006-2007 season Compendium amendments, was needed to minimize further disturbance or harassment of plovers by off-leash dogs.

The park has now analyzed data gathered during the 2006-2007 overwintering season. That analysis is presented in the Addendum: 2006 Plover Monitoring (June 29, 2007); Western Snowy Plovers and Recent Changes In Human Dog Use Within the Snowy Plover Management Area at Ocean Beach and the Wildlife Protection Area at Crissy Field (November 2, 2006).

Based on the monitoring data from 2006, and comparisons to previous year’s monitoring, it is clear that high numbers of off-leash dogs and dogs chasing shorebirds are still a

threat to Western Snowy Plovers and other shorebirds using the SPPA at Ocean Beach and the Wildlife Protection Area at Crissy Field. The monitoring data from 2006 at Ocean Beach support the conclusion that the pets on-leash restriction enacted in early November reduced the numbers of off-leash dogs and the incidents of dogs chasing shorebirds. Increased efforts in both these areas to raise compliance levels with the on-leash restrictions, which would then reduce threat levels to snowy plovers and shorebirds, would be beneficial.

Applicable Law and Policy:

The Western Snowy Plover is protected under the Federal Endangered Species Act. 16 U.S.C. Section 1531 *et seq.* The 2006 National Park Service Management Policies provide guidance to the NPS for the management of threatened and endangered species. Section 4.4.2.3. of the Management Policies states that the NPS “will fully meet its obligations under the NPS Organic Act and the Endangered Species Act to both proactively conserve listed species and prevent detrimental effects on these species.” Among the specific actions that the NPS can take to fulfill this obligation is to “manage detrimental visitor access” that is negatively effecting listed species.

The June 2005 ruling of the U.S. District Court in U.S. v. Barley did not eliminate the park’s ability to exercise its authority to protect park resources. The ruling states that it “...in no way restricts the authority of the superintendent or the NPS to protect the resources, including protection of threatened and endangered species.”

In our view, off-leash dog use documented in these two areas detrimentally affected the Western Snowy Plover during the 2005-2006 overwintering season and there was a decrease in the percentage of off-leash dogs during the last overwintering season as a result of the Compendium restrictions. There is nothing in the Barley ruling that prohibits the park from taking action to prevent detrimental impacts to park resources. Therefore, we have determined that the subject Compendium amendments are consistent with applicable law and policy.

Process for Adopting Emergency Compendium Restrictions:

Under 36 C.F.R. Section 1.5, superintendents are authorized to take emergency action to protect park resources. In both emergency and non-emergency situations, park superintendents may adopt compendium provisions that restrict visitor activities. Public notice and comment is not required in emergency situations. Even though this is an emergency situation, the park is prepared to provide public notice as described in 36 C.F.R. Section 1.7.

The proposed regulatory provisions are the minimum level acceptable to meet our management obligations with regard to the protection of park resources. Under the proposed restrictions, pets will still be allowed in the Crissy Field Wildlife Protection Area and the Ocean Beach Plover area provided that they are leashed. Thus, park visitors with dogs may continue to enjoy these areas, provided that their dogs are kept on-leash.

Off-leash dog walking opportunities are currently available in adjacent portions of Crissy Field and Ocean Beach, and in other portions of the park.

Crissy Field dogwalking options allow for .99 miles of dogwalking off-leash and .32 miles of dogwalking on-leash. Ocean Beach and the beach at Fort Funston, which lies just to the south, allows for 2.4 miles of off-leash dogwalking and 2.2 miles of on-leash dogwalking.

During the upcoming overwintering season, we also propose to increase efforts to obtain compliance with the on-leash requirement. This could be achieved through increased law enforcement patrols and also through increased outreach and public education efforts. We recommend that you direct appropriate park staff to discuss methods for achieving heightened public compliance with the on-leash requirements.

NEPA Compliance:

The Handbook for NPS Director's Order 12 contains a listing of Categorical Exclusions. Section 3.4 D(2) of the Director's Order 12 Handbook provides that "minor changes in programs and regulations pertaining to visitor activities" may be categorically excluded under NEPA. The proposed restrictions at Ocean Beach and Crissy Field are actions that would result in minor changes to regulated visitor activities in these areas (transitioning seasonally from unleashed to leashed pet recreation). The park has prepared all the appropriate Categorical Exclusion screening forms, which are attached for your review. These forms disclose that the actions would result in no measurable adverse environmental effects. Furthermore, no exceptional circumstances or conditions exist that would make use of a Categorical Exclusion inappropriate. As such, we believe that a Categorical Exclusion under NEPA is the appropriate form of NEPA compliance for these regulatory provisions.

Public Notice:

The NPS will notify the public through posted signs, brochures and the Park's website. An informational brochure has been developed. It explains the reason for this action and it includes a description of the affected areas. The brochure will be provided to visitors on site, at park visitor information areas, and via the Park's website. Additionally, park staff will be on-site as often as possible to inform the public of the restriction, to educate them about the Western Snowy Plover, and to enforce the Compendium amendments. Members of the Negotiated Rulemaking Committee for Dog Management at Golden Gate

National Recreation Area were briefed of this proposed action on June 28, 2007.

/s/ Daphne Hatch
_____(signed original on file)_____ and
Chief of Natural Resource Management & Science

/s/ Yvette Ruan
_____(signed original on file)____
Chief Ranger

Attachments:

Compendium Amendments

NEPA Categorical Exclusion Documentation

Addendum: 2006 Plover Monitoring (June 29, 2007); Western Snowy Plovers and Recent Changes In Human Dog Use Within the Snowy Plover Management Area at Ocean Beach and the Wildlife Protection Area at Crissy Field (November 2, 2006)

USFWS Concurrence with Not Likely to Adversely Affect Determination

Maps of Plover Management Area at Ocean Beach and the Wildlife Protection Area at Crissy Field

Concurrence:

/s/ Brian O'Neill
(signed original on file)
General Superintendent, Golden Gate NRA

June 29, 2007
Date

COMPENDIUM AMENDMENT
EMERGENCY REGULATORY PROVISION
Golden Gate National Recreation Area
Resource Protection Measures
36 C.F.R. Section 1.5 (a)(2)

Compendium of designations closures, public use limits, and other restrictions are imposed under discretionary authority by the General Superintendent, Golden Gate National Recreation Area.

In accordance with the delegated authority provided in Section 1.5 of Title 36 of the Code of Federal Regulations, as authorized by Section 3 of Title 16 of the United States Code, the following emergency regulatory provision is established for the proper management, protection, and public use of the portion of Crissy Field, Golden Gate National Recreation Area that is under the jurisdiction of the National Park Service. The public has been notified of this restriction in accordance with the requirements of Section 1.7 of Title 36 of the Code of Federal Regulations.

Under authority of Title 36, Code of Federal Regulations, Section 1.5 (a)(2) the following restriction is established:

- **Dogwalking is restricted to on-leash only in the Crissy Field Wildlife Protection Area** which encompasses: from the west, starting at Fort Point Mine Depot (a.k.a. Torpedo Wharf) eastward to concrete riprap, which lies approximately 700 feet east of former Coast Guard Station, and includes all uplands and all tidelands and extends from the high-water mark to 100 yards off shore (as depicted in Figure 1). The definition of on-leash use requires that dogs must be restrained on a leash which shall not exceed six feet in length.

The activity restriction is necessary to provide an area of reduced disturbance for resting and feeding by the Western Snowy Plover (*Charadrius alexandrinus nivosus*), a species listed as “threatened” under the federal Endangered Species Act. This activity restriction requiring pets on-leash in the Wildlife Protection Area will become effective July 1, 2007. This seasonal restriction will remain in effect until monitoring determines the species is no longer present, as announced by the General Superintendent. Public notice of the revocation of this restriction will be made in accordance with Section 1.7 of Title 36 of the Code of Federal Regulations.

Approved by: _____
/s/ Brian O’Neill
(signed copy on file)
Brian O’Neill
General Superintendent
Golden Gate National Recreation Area

6/29/07

Date

DRAFT
8/1/2013

THE PRESIDIO TRUST

36 CFR Part 1002

Public Use Limit on Commercial Dog Walking

AGENCY: The Presidio Trust

ACTION: Proposed interim rule and request for comments.

SUMMARY: The Presidio Trust (Trust) is proposing a public use limit on persons who are walking four or more dogs at one time in Area B of the Presidio of San Francisco (Presidio) for consideration (commercial dog walkers). The limit will require any commercial dog walker in Area B to possess a valid commercial dog walking permit obtained from the National Park Service (NPS). Commercial dog walkers with four or more dogs at one time in Area B will be required to comply with the terms and conditions of the NPS permit as well as those rules and regulations otherwise applicable to Area B of the Presidio. The NPS commercial dog walking permit requirement is a compendium amendment being proposed for ~~specified sites in~~ the Golden Gate National Recreation Area (GGNRA) sites in San Francisco and Marin County that allow dog walking, and would be implemented concurrently with the Trust's proposed rule. Both are interim actions and would remain in effect until the final special regulation for dog walking in GGNRA is promulgated as anticipated in 2015, at which time the Trust will adopt a final rule following public input and comment.

Comment [SES1]: We're discussing whether this is really a public use limit, since it affects commercial walkers only. We had thought we would be moving forward under 36 CFR 5.3 Business Operations, which mentions a permit as one method of authorizing. Need to discuss with SOL, and am hoping to do so very soon.

Comment [SES2]: We may be tweaking how we describe this – will know more after next SOL call.

The Trust wishes to thank the NPS for their support and the public for their participation in this process.

DATES: Public comment on this proposal will be accepted through [REDACTED], 2013.

ADDRESSES: Electronic comments may be sent to cdw@presidiotrust.gov. Written comments may be mailed or hand delivered to John Pelka, The Presidio Trust, 103 Montgomery Street, P.O. Box 29052, San Francisco, CA 94129. All written comments submitted to the Trust will be considered, and these proposals may be modified accordingly. The final decision of the Trust will be published in the Federal Register.

Public Availability of Comments: If individuals submitting comments request that their address or other contact information be withheld from public disclosure, it will be honored to the extent allowable by law. Such requests must be stated prominently at the beginning of the comments. The Trust will make available for public inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses.

Anonymous comments may not be considered.

FOR FURTHER INFORMATION CONTACT: Joshua Steinberger, 415.561.5300.

SUPPLEMENTARY INFORMATION: The 1,491-acre former U.S. Army base known as the Presidio is at the center and part of GGNRA. Administrative jurisdiction over the Presidio is divided between the Trust and the NPS. The Trust oversees the interior 1,100 acres, Area B, and the NPS oversees approximately 300 acres along the waterfront, Area A, of the national park site. Commercial dog walkers have been regularly using the Presidio for at least ten years. According to the most recent estimates by the San Francisco Professional Dog Walkers Association, there are currently approximately 300 commercial dog walkers in the City and County of San Francisco (City). Trust staff estimates that between ten to twenty of these commercial dog walkers walk their dogs within Area B during any given time of day, typically bringing between four and ten dogs or more at a time. Most often-used areas include the corridor adjoining West Pacific Avenue from the Broadway Gate to the 14th Avenue Gate, as well as the areas east of the Ecology Trail in the Tennessee Hollow Watershed. By both direct observation and through reports from the public, the Trust is aware that dogs brought into the Presidio in these numbers have been responsible for damage to resources, threats to public safety, and visitor conflict.

Comment [SES3]: ACC and ProDog both say this is a guesstimate, with no documentation, so we made that clear, while explaining why (below radar, etc)

To ensure that commercial dog walkers act responsibly, effective July 1, 2013, the City passed legislation that requires commercial dog walkers with four or more dogs, limited to eight dogs total, to carry a valid annually renewed dog walking permit issued by the San Francisco Department of Animal Care & Control (<http://www.sfgov2.org/index.aspx?page=3857>). The law is enforced on all City property under the San Francisco Department of Recreation and Parks, the Port of San Francisco, and the San Francisco Public Utilities Commission but does not apply to federal property within the GGNRA, including Area B. Currently, the Trust does not impose restrictions specific to commercial dog walkers in Area B. Therefore, it is reasonable to expect that a certain number of commercial dog walkers who would otherwise fall under the City's legislation, will walk their dogs in Area B in order to avoid the permit fees, requirements, and limit on the number of dogs they may walk on City lands covered by the regulation.

Under 36 C.F.R. 1001.5, the Trust may impose reasonable public use limits in Area B, given a determination that such action is necessary to maintain public health and safety, to protect environmental or scenic values, to protect natural or cultural resources, or to avoid conflict among visitor use activities. On November 21, 2012, in direct response to the City's commercial dog walker regulations, the Trust requested public comment on a proposed public use limit on commercial dog walkers (77 FR 69785). The limit would have required commercial dog walkers in Area B to possess a valid dog walking permit obtained from the City. Commercial dog walkers would have needed to comply with the terms and conditions of the City permit as well as those rules and regulations otherwise applicable to Area B. In proposing the public use limit, the Trust felt that the possession of a valid City permit, which sets basic insurance, training, and safety standards and limits the number of dogs a commercial dog walker may walk at once in City parks and other designated areas, would have assisted in implementing its responsibilities, including the avoidance of conflicts among

Comment [SES4]: Again, the question as to whether this is a "public" use limit.

the many different users of the Presidio, equitable allocation and use of facilities, ensuring public safety, and protecting resources.

The initial 65-day comment period for the proposed use limit was extended by 30 days to February 25, 2013 at the request of the public. By the close of the public comment period, the Trust had received 257 individual comments, including 9 oral comments provided at a public Trust Board of Directors meeting on November 29, 2012. Roughly half (51 percent) of the comments received expressed support for the public use limit, and roughly half (49 percent) were opposed. Commenters who opposed the proposed use limit, including four conservation organizations, were largely “dissatisfied with the status quo” of the presence of commercial dog walkers in the Presidio and wished to see the activity prohibited. They recommended that the Trust should not adopt the proposed use limit until such time as the NPS published their own policies and requirements on commercial dog walkers. They further requested the Trust to work in partnership with the NPS and “come out together with one system clearly defined.” They urged that “a single, clear rule that can be widely broadcast to dog walkers in the area will allow for more efficient administration, greater compliance, and reduced impacts to Trust resources.” One dog owner group also supported deferring implementation of the proposed rule until such time as the GGNRA adopted its rule.

In its February 25, 2013 letter to the Trust, the NPS stated its support for the Trust’s public use limit. The NPS disagreed, however, with the number of dogs allowed under the City permit (up to eight), and argued that a limit of six dogs is more reasonable, and is the standard practice for the majority of local land management agencies that regulate commercial dog walking. In reaction to the City’s program and the Trust’s proposal, the NPS stated it would implement-consider enacting an interim commercial dog walking permit system this year, before completing its dog management planning process and rulemaking. Given the Trust’s and NPS’ shared management responsibilities within the Presidio, the NPS asked the Trust to consider adopting its interim permit system rather than that being implemented by the City.

On May 30, 2013, the Trust announced on its website that it supported the NPS’ decision proposed intention to move forward at this time to create and implement an interim permit system to regulate commercial dog walking within the park. After having examined all public comments and considered the new information provided by the NPS, the Trust agreed to suspend its own decisions regarding the regulation of commercial dog walking until the earlier of November 1, 2013 or the date that the NPS’ interim commercial dog walking permit system is enacted. Before taking any action, the Trust offered to provide the public with an additional opportunity to comment.

On [REDACTED], 2013, the NPS invited public comment on its proposal to require that commercial dog walkers in specified-all San Francisco and Marin County sites of GGNRA where dog walking is allowed, including Area A, to obtain a permit from the park ([REDACTED] FR [REDACTED]). Permits will allow a maximum of six dogs per dog walker, and require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA. Permit holders must

also abide by all NPS regulations. The NPS action is an interim compendium amendment (2013 Superintendent’s Compendium of Designations, Closures, Permit Requirements, and Other Restrictions Imposed under Discretionary Authority) and would remain in effect for approximately two years until the final special regulation for dog walking in the GGNRA, which will address commercial dog walking, is promulgated. The NPS involved the Trust throughout the development of the interim commercial permit requirement.

Aligning with the City’s rather than the NPS’ permit system could be considered a less restrictive measure reasonably available to the Trust due to the City’s higher limit on the maximum number of dogs allowed (eight), which poses less of a financial burden on commercial dog walkers. In a recent local newspaper article on the subject, the author of the City’s legislation and City supervisor said that it was preferable to be less restrictive in light of the City’s “huge population of dog owners” and the fact that “many of them don’t have yards” (<http://www.sfchronicle.com/bayarea/article/Commercial-dog-walkers-must-follow-new-law-4665243.php>). However, the NPS has expressed concern that commercial dog walkers could not consistently control more than six dogs under voice and sight control. And while the City’s Department of Animal Care & Control enforces eight dogs as the limit for one commercial dog walker, in its Commercial Dog Walker Informational Pamphlet, it recommends six as a maximum number (<http://www.sfgov2.org/Modules/ShowDocument.aspx?documentid=1419>). NPS research on the maximum number reveals that the City’s regulation allowing up to eight dogs is an outlier among jurisdictions around the country. As caretaker of the national park site and while mindful of the importance of equitably allocating facilities within the park, the Trust must place a higher priority on avoiding conflict among visitor uses, protection of environmental values, natural resources, and cultural resources and maintaining health and safety over addressing City residents’ needs and affecting the individual earnings of commercial dog walkers (or otherwise having them choose to go elsewhere to walk their dogs). In addition, adopting the City’s less restrictive measure in lieu of the NPS’ interim permit system would engender public confusion given the Presidio’s presence within the boundaries of the GGNRA, the similar visitor experience mandates of the Trust and NPS, and the adjacent jurisdictions of the two land management agencies with an unmarked boundary line within the Presidio.

The Trust’s limitation will go into effect on the operative date of the NPS’ commercial dog walking permit requirement, and will remain in effect until the NPS’ interim action is supplanted by a special regulation for dog walking in the GGNRA, which will address commercial dog walking. Prior to implementation, the Trust will conduct a public outreach and education campaign to alert commercial dog walkers and others about the use limitation. The Trust will also post signs and provide handouts to notify park users of the limitation in areas where dog walking is a particularly high-use activity.

Regulatory Impact: The proposed amendment will not have an annual effect of \$100 million or more on the economy nor adversely affect productivity, competition, jobs, the environment, public health or safety, or State or local or tribal governments or communities. The proposed rule will not interfere with an action taken or planned by another agency or raise new legal or policy issues. In short, little or no effect on the national economy will

result from adoption of the proposed rule. Because the proposed rule is not “economically significant,” it is not subject to review by the Office of Management and Budget under Executive Order 12866 or Executive Order 13536. The proposed rule is not a “major rule” under the Congressional review provisions of the Small Business Regulatory Enforcement Fairness Act, 5 U.S.C. 801 et seq.

The Trust has determined and certifies pursuant to the Regulatory Flexibility Act, 5 U.S.C. 601 et seq., that the proposed rule will not have a significant economic effect on a substantial number of small entities. The economic effect of this rule is local in nature and negligible in scope, restricting only a single use (commercial dog walking) in a limited geographic area (Area B of the Presidio occupies less than four percent of the City and County of San Francisco’s total acreage) for purposes of protecting public health and safety and the natural environment. There would be no loss of significant numbers of jobs, as commercial dog walkers will retain the flexibility to avoid the proposed restriction and permit fees by opting to use one or more of the available open space lands maintained by the San Francisco Park and Recreation Department, the Port of San Francisco, and the San Francisco Public Utilities Commission. Among these lands are 28 specifically designated off-leash park areas for dogs throughout the City, including the Mountain Lake Park Dog Play Area that is immediately adjacent to Area B (see <http://sfrecpark.org/parks-open-spaces/dog-play-areas-program/> for a location map for specified areas and for information on the process for establishment of additional off-leash areas within the City’s park system).

The Trust has determined and certifies pursuant to the Unfunded Mandates Reform Act, 2 U.S.C. 1502 et seq., that this rule will not impose a cost of \$100 million or more in any given year on local, State, or tribal governments or private entities.

Environmental Impact: The National Environmental Policy Act (NEPA) mandates that federal agencies responsible for preparing environmental analyses and documentation do so in cooperation with other governmental agencies. The Trust is a cooperating agency with special expertise for the NPS’ proposed commercial dog walking permit requirement under the NEPA and the Council on Environmental Quality regulations (an agency is considered to have special expertise when it has a related "statutory responsibility, agency mission, or ...program experience" (40 C.F.R. 1508.26)). The actions covered by the NPS and the Trust regarding commercial dog management for Areas A and B are substantially the same. The Trust devoted considerable staff resources to assist in the development of information and the preparation of environmental analyses for the proposal at the request of the NPS. The NPS has prepared a Project Screening Form that incorporates the Trust’s environmental analyses to determine that the regulatory actions would have no significant effect on the environment. The NPS’ Project Screening Form is part of the Trust’s administrative record on this matter. The Trust will rely on the NPS’ ongoing NEPA process and extensive public input for dog management GGNRA-wide, adopt the Project Screening Form the NPS has prepared for its commercial dog management proposal, and draw its conclusions from it. The NPS’ Project Screening Form is available for public inspection at [REDACTED].

Other Authorities: The Trust has drafted and reviewed the proposed rule in light of *Executive Order 12988* and has determined that it meets the applicable standards provided in secs. 3(a) and (b) of that Order.

List of Subjects in 36 CFR Part 1002

National parks, Natural resources Public lands, Recreation and recreation areas

For the reasons set forth in the preamble, part 1002 of Title 36 of the Code of Federal Regulations is proposed to be amended as an interim action as set forth below:

PART 1002—RESOURCE PROTECTION, PUBLIC USE AND RECREATION

1. The authority citation for part 1002 continues to read as follows:

Authority: Pub. L. 104-333, 110 Stat. 4097 (16 U.S.C. 460bb note).

2. In § 1002.15, add paragraph (f) to read as follows:

§ 1002.15 Pets.

(6) The walking of four or more dogs at one time by any one person for consideration is prohibited within the area administered by the Presidio Trust unless:

(i) That person has been issued a currently valid permit under the restriction set forth in Title 36 of the Code of Federal Regulations, Section 5.3.

(ii) The walking of four or more dogs is done pursuant to the terms and conditions of that permit as well as in compliance with all laws and regulations in effect in the area administered by the Presidio Trust; and

(iii) The permit is produced for inspection upon request by an officer with law enforcement authority in the area administered by the Presidio Trust.

Dated: [REDACTED], 2013.

Karen A. Cook,

General Counsel.

BILLING CODE 4310-4R-P

DRAFT
8/1/2013

THE PRESIDIO TRUST

36 CFR Part 1002

Public Use Limit on Commercial Dog Walking

AGENCY: The Presidio Trust

ACTION: Proposed interim rule and request for comments.

SUMMARY: The Presidio Trust (Trust) is proposing a public use limit on persons who are walking four or more dogs at one time in Area B of the Presidio of San Francisco (Presidio) for consideration (commercial dog walkers). The limit will require any commercial dog walker in Area B to possess a valid commercial dog walking permit obtained from the National Park Service (NPS), Golden Gate National Recreation Area (GGNRA). Commercial dog walkers with four or more dogs at one time in Area B will be required to comply with the terms and conditions of the NPS-GGNRA permit as well as those rules and regulations otherwise applicable to Area B of the Presidio. The NPS-GGNRA interim commercial dog walking permit requirement is a compendium amendment being proposed for all specified sites in the Golden Gate National Recreation Area (GGNRA) sites in San Francisco and Marin County that allow dog walking, and would be implemented concurrently with the Trust's proposed rule. Both are interim actions and would remain in effect until the final special regulation for dog walking in GGNRA is promulgated as anticipated in 2015, at which time the Trust will adopt a final rule following public input and comment.

The Trust wishes to thank the NPSGGNRA for their support and the public for their participation in this process.

DATES: Public comment on this proposal will be accepted through , 2013.

ADDRESSES: Electronic comments may be sent to cdw@presidiotrust.gov. Written comments may be mailed or hand delivered to John Pelka, The Presidio Trust, 103 Montgomery Street, P.O. Box 29052, San Francisco, CA 94129. All written comments submitted to the Trust will be considered, and these proposals may be modified accordingly. The final decision of the Trust will be published in the Federal Register.

Public Availability of Comments: If individuals submitting comments request that their address or other contact information be withheld from public disclosure, it will be honored to the extent allowable by law. Such requests must be stated prominently at the beginning of the comments. The Trust will make available for public inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses.

Comment [SES1]: We're discussing whether this is really a public use limit, since it affects commercial walkers only. We had thought we would be moving forward under 36 CFR 5.3 Business Operations, which mentions a permit as one method of authorizing. Need to discuss with SOL, and am hoping to do so very soon.

Comment [SES2]: We may be tweaking how we describe this – will know more after next SOL call.

Anonymous comments may not be considered.

FOR FURTHER INFORMATION CONTACT: Joshua Steinberger, 415.561.5300.

SUPPLEMENTARY INFORMATION: The 1,491-acre former U.S. Army base known as the Presidio is at the center and part of GGNRA. Administrative jurisdiction over the Presidio is divided between the Trust and the NPS. The Trust oversees the interior 1,100 acres, Area B, and the NPS oversees approximately 300 acres along the waterfront, Area A, of the national park site. Commercial dog walkers have been regularly using the Presidio for at least ten years. According to the most recent estimates by the San Francisco Professional Dog Walkers Association, there ~~are currently approximately~~ may be as many as 300 commercial dog walkers in the City and County of San Francisco (City). Trust staff estimates that between ten to twenty of these commercial dog walkers walk their dogs within Area B during any given time of day, typically bringing between four and ten dogs or more at a time. Most often-used areas include the corridor adjoining West Pacific Avenue from the Broadway Gate to the 14th Avenue Gate, as well as the areas east of the Ecology Trail in the Tennessee Hollow Watershed. By both direct observation and through reports from the public, the Trust is aware that dogs brought into the Presidio in these numbers have been responsible for damage to resources, threats to public safety, and visitor conflict.

Comment [SES3]: ACC and ProDog both say this is a guesstimate, with no documentation, so we made that clear, while explaining why (below radar, etc)

To ensure that commercial dog walkers act responsibly, effective July 1, 2013, the City passed legislation that requires commercial dog walkers with four or more dogs, limited to eight dogs total, to carry a valid annually renewed dog walking permit issued by the San Francisco Department of Animal Care & Control (<http://www.sfgov2.org/index.aspx?page=3857>). The law is enforced on all City property under the San Francisco Department of Recreation and Parks, the Port of San Francisco, and the San Francisco Public Utilities Commission but does not apply to federal property within ~~the GGNRA~~ the City, including Area B. Currently, the Trust does not impose restrictions specific to commercial dog walkers in Area B. Therefore, it is reasonable to expect that a certain number of commercial dog walkers who would otherwise fall under the City's legislation, will walk their dogs in Area B in order to avoid the permit fees, requirements, and limit on the number of dogs they may walk on City lands covered by the regulation.

Under 36 C.F.R. 1001.5, the Trust may impose reasonable public use limits in Area B, given a determination that such action is necessary to maintain public health and safety, to protect environmental or scenic values, to protect natural or cultural resources, or to avoid conflict among visitor use activities. On November 21, 2012, in direct response to the City's commercial dog walker regulations, the Trust requested public comment on a proposed public use limit on commercial dog walkers (77 FR 69785). The limit would have required commercial dog walkers in Area B to possess a valid dog walking permit obtained from the City. Commercial dog walkers would have needed to comply with the terms and conditions of the City permit as well as those rules and regulations otherwise applicable to Area B. In proposing the public use limit, the Trust felt that the possession of a valid City permit, which sets basic insurance, training, and safety standards and limits the number of dogs a commercial dog walker may walk at once in City parks and other designated areas, would have assisted in implementing its responsibilities, including the avoidance of conflicts among

the many different users of the Presidio, equitable allocation and use of facilities, ensuring public safety, and protecting resources.

The initial 65-day comment period for the proposed use limit was extended by 30 days to February 25, 2013 at the request of the public. By the close of the public comment period, the Trust had received 257 individual comments, including 9 oral comments provided at a public Trust Board of Directors meeting on November 29, 2012. Roughly half (51 percent) of the comments received expressed support for the public use limit, and roughly half (49 percent) were opposed. Commenters who opposed the proposed use limit, including four conservation organizations, were largely “dissatisfied with the status quo” of the presence of commercial dog walkers in the Presidio and wished to see the activity prohibited. They recommended that the Trust should not adopt the proposed use limit until such time as ~~the NPSGGNRA~~ published ~~their-its~~ own policies and requirements on commercial dog walkers. They further requested the Trust to work in partnership with ~~the NPSGGNRA~~ and “come out together with one system clearly defined.” They urged that “a single, clear rule for federal park properties that can be widely broadcast to dog walkers in the area will allow for more efficient administration, greater compliance, and reduced impacts to Trust resources.” One dog owner group also supported deferring implementation of the proposed rule until such time as ~~the~~GGNRA adopted its rule.

In its February 25, 2013 letter to the Trust, ~~the NPSGGNRA~~ stated its support for the Trust’s public use limit. ~~The NPSGGNRA~~ disagreed, however, with the number of dogs allowed under the City permit (up to eight), and argued that a limit of six dogs is more reasonable, and is the standard practice for the majority of local land management agencies that regulate commercial dog walking. In reaction to the City’s program and the Trust’s proposal, ~~the NPS-GGNRA~~ stated it would ~~implement-consider enacting~~ an interim commercial dog walking permit system this year, before completing its dog management planning process and rulemaking. Given the Trust’s and ~~NPS-GGNRA’s~~ shared management responsibilities within the Presidio, ~~the NPSGGNRA~~ asked the Trust to consider adopting its interim permit system rather than that being implemented by the City.

On May 30, 2013, the Trust announced on its website that it supported ~~the NPS-GGNRA’s decision-proposed intention~~ to move forward at this time to create and implement an interim permit system to regulate commercial dog walking within the park. After having examined all public comments and considered the new information provided by ~~the NPSGGNRA~~, the Trust agreed to suspend its own decisions regarding the regulation of commercial dog walking until the earlier of November 1, 2013 or the date that the ~~NPS-GGNRA~~ interim commercial dog walking permit system is enacted. Before taking any action, the Trust offered to provide the public with an additional opportunity to comment.

On , 2013, ~~the NPSGGNRA~~ invited public comment on its proposal to require that commercial dog walkers in specified all San Francisco and Marin County sites of GGNRA where dog walking is allowed, including Area A, to obtain a permit from the park (FR). Permits will allow a maximum of six dogs per dog walker, and require a business license and proof of liability insurance and approved dog-handling training through existing training courses, such as those offered by Marin Humane or SF SPCA. Permit

holders must also abide by all NPS regulations. The ~~NPS-GGNRA~~ action is an interim compendium amendment (2013 Superintendent's Compendium of Designations, Closures, Permit Requirements, and Other Restrictions Imposed under Discretionary Authority) and would remain in effect for approximately two years until the final special regulation for dog walking in ~~the~~-GGNRA, which will address commercial dog walking, is promulgated. ~~The NPSGGNRA~~ involved the Trust throughout the development of the interim commercial permit requirement.

Aligning with the City's rather than the ~~NPS-GGNRA~~ permit system could be considered a less restrictive measure reasonably available to the Trust due to the City's higher limit on the maximum number of dogs allowed (eight), which poses less of a financial burden on commercial dog walkers. In a recent local newspaper article on the subject, the author of the City's legislation and City supervisor said that it was preferable to be less restrictive in light of the City's "huge population of dog owners" and the fact that "many of them don't have yards" (<http://www.sfchronicle.com/bayarea/article/Commercial-dog-walkers-must-follow-new-law-4665243.php>). However, the NPS has expressed concern that commercial dog walkers could not consistently control more than six dogs under voice and sight control. And while the City's Department of Animal Care & Control enforces eight dogs as the limit for one commercial dog walker, in its Commercial Dog Walker Informational Pamphlet, it recommends six as a maximum number (<http://www.sfgov2.org/Modules/ShowDocument.aspx?documentid=1419>). ~~NPS-GGNRA~~ research on the maximum number reveals that the City's regulation allowing up to eight dogs is an outlier among jurisdictions around the country. As caretaker of the national park site and while mindful of the importance of equitably allocating facilities within the park, the Trust must place a higher priority on avoiding conflict among visitor uses, protection of environmental values, natural resources, and cultural resources and maintaining health and safety over addressing City residents' needs and affecting the individual earnings of commercial dog walkers (or otherwise having them choose to go elsewhere to walk their dogs). In addition, adopting the City's less restrictive measure in lieu of the ~~NPS-GGNRA~~ interim permit system would engender public confusion given the Presidio's presence within the boundaries of ~~the~~-GGNRA, the similar visitor experience mandates of the Trust and ~~the~~ NPS, and the adjacent jurisdictions of the two land management agencies with an unmarked boundary line within the Presidio.

The Trust's limitation will go into effect on the operative date of the ~~NPS-GGNRA's interim~~ commercial dog walking permit requirement, and will remain in effect until ~~the NPS-GGNRA's~~ interim action is supplanted by a special regulation for dog walking in ~~the~~ GGNRA, which will address commercial dog walking. Prior to implementation, the Trust will conduct a public outreach and education campaign to alert commercial dog walkers and others about the use limitation. The Trust will also post signs and provide handouts to notify park users of the limitation in areas where dog walking is a particularly high-use activity.

Regulatory Impact: The proposed amendment will not have an annual effect of \$100 million or more on the economy nor adversely affect productivity, competition, jobs, the environment, public health or safety, or State or local or tribal governments or communities. The proposed rule will not interfere with an action taken or planned by another agency or

raise new legal or policy issues. In short, little or no effect on the national economy will result from adoption of the proposed rule. Because the proposed rule is not “economically significant,” it is not subject to review by the Office of Management and Budget under [Executive Order 12866](#) or [Executive Order 13536](#). The proposed rule is not a “major rule” under the Congressional review provisions of the Small Business Regulatory Enforcement Fairness Act, [5 U.S.C. 801 et seq.](#)

The Trust has determined and certifies pursuant to the Regulatory Flexibility Act, [5 U.S.C. 601 et seq.](#), that the proposed rule will not have a significant economic effect on a substantial number of small entities. The economic effect of this rule is local in nature and negligible in scope, restricting only a single use (commercial dog walking) in a limited geographic area (Area B of the Presidio occupies less than four percent of the City and County of San Francisco’s total acreage) for purposes of protecting public health and safety and the natural environment. There would be no loss of significant numbers of jobs, as commercial dog walkers will retain the flexibility to avoid the proposed restriction and permit fees by opting to use one or more of the available open space lands maintained by the San Francisco Park and Recreation Department, the Port of San Francisco, and the San Francisco Public Utilities Commission. Among these lands are 28 specifically designated off-leash park areas for dogs throughout the City, including the Mountain Lake Park Dog Play Area that is immediately adjacent to Area B (see <http://sfrecpark.org/parks-open-spaces/dog-play-areas-program/> for a location map for specified areas and for information on the process for establishment of additional off-leash areas within the City’s park system).

Comment [SES4]: Flagging a displacement issue..?

The Trust has determined and certifies pursuant to the Unfunded Mandates Reform Act, [2 U.S.C. 1502 et seq.](#), that this rule will not impose a cost of \$100 million or more in any given year on local, State, or tribal governments or private entities.

Environmental Impact: The National Environmental Policy Act (NEPA) mandates that federal agencies responsible for preparing environmental analyses and documentation do so in cooperation with other governmental agencies. The Trust is a cooperating agency with special expertise for the ~~NPS’-GGNRA~~ proposed interim commercial dog walking permit requirement under the NEPA and the Council on Environmental Quality regulations (an agency is considered to have special expertise when it has a related “statutory responsibility, agency mission, or ...program experience” (40 C.F.R. 1508.26)). The actions covered by ~~the NPS-GGNRA~~ and the Trust regarding interim commercial dog management for Areas A and B are substantially the same. The Trust devoted considerable staff resources to assist in the development of information and the preparation of environmental analyses for the proposal at the request of ~~the NPSGGNRA~~. ~~The NPSGGNRA~~ has prepared a Project Screening Form that incorporates the Trust’s environmental analyses to determine that the regulatory actions would have no significant effect on the environment. The ~~NPS’-GGNRA~~ Project Screening Form is part of the Trust’s administrative record on this matter. The Trust will rely on ~~the NPS’-GGNRA’s~~ ongoing NEPA process and extensive public input for dog management GGNRA-wide, adopt the Project Screening Form ~~the NPSGGNRA~~ has prepared for its interim commercial dog management proposal, and draw its conclusions from it. The ~~NPS’-GGNRA~~ Project Screening Form is available for public inspection at
_____.

Other Authorities: The Trust has drafted and reviewed the proposed rule in light of *Executive Order 12988* and has determined that it meets the applicable standards provided in secs. 3(a) and (b) of that Order.

List of Subjects in 36 CFR Part 1002

National parks, Natural resources Public lands, Recreation and recreation areas

For the reasons set forth in the preamble, part 1002 of Title 36 of the Code of Federal Regulations is proposed to be amended as an interim action as set forth below:

PART 1002—RESOURCE PROTECTION, PUBLIC USE AND RECREATION

1. The authority citation for part 1002 continues to read as follows:

Authority: Pub. L. 104-333, 110 Stat. 4097 (16 U.S.C. 460bb note).

2. In § 1002.15, add paragraph (f) to read as follows:

§ 1002.15 Pets.

(6) The walking of four or more dogs at one time by any one person for consideration is prohibited within the area administered by the Presidio Trust unless:

(i) That person has been issued a currently valid permit under the restriction set forth in Title 36 of the Code of Federal Regulations, Section 5.3.

(ii) The walking of four or more dogs is done pursuant to the terms and conditions of that permit as well as in compliance with all laws and regulations in effect in the area administered by the Presidio Trust; and

(iii) The permit is produced for inspection upon request by an officer with law enforcement authority in the area administered by the Presidio Trust.

Dated: [REDACTED], 2013.

Karen A. Cook,

General Counsel.

BILLING CODE 4310-4R-P

Exhibit "C"
Lease No. HL-GOGA0001-04

Fort Baker, Barry and Cronkhite Historic District
Golden Gate National Recreation Area, San Francisco, California

FORT MASON RESIDENTIAL RULES

These Fort Mason Residential Rules will also apply to the Fort Barry residences and are attached as an exhibit to the Lease. Except as otherwise specified herein, any terms used in these Fort Mason Residential Rules are as defined in the Lease. In the event of any apparent conflict between the terms, conditions, or provisions of the Lease and these Fort Mason Residential Rules, the terms of the Lease, including any amendments, shall prevail. These Fort Mason Residential Rules may be modified from time to time by Lessor in its sole discretion.

1. BASIS

a) Residences within the Fort Baker, Barry and Cronkhite Historic District are located within the Golden Gate National Recreation Area ("GGNRA" or "park"), a unit of America's National Park System, which is administered by the National Park Service ("NPS"), an agency of the United States Department of the Interior, whose Chief Executive is its Director. The Fort Baker, Barry and Cronkhite Historic District contains many important natural and cultural resources which the NPS is obligated by law and its mission to protect.

b) The historic residences at Fort Barry are typical of most older residences in that they contain lead based paint, including lead based paint which has migrated into the surrounding soil over the years. Furthermore, while asbestos-containing material has been removed from residences where it presents a potential health hazard, many of the historic residences contain encapsulated asbestos in areas where they could be disturbed by construction activity.

c) For these reasons, the NPS has established these Fort Mason Residential Rules to ensure the protection of resources and residents at Fort Barry. As residents in a National Park pursuant to a lease with the United States of America, persons occupying Fort Barry residences and their guests, employees, and other invitees ("Tenants") are also required to follow all regulations, rules, and procedures established by the NPS (references are listed at the end of this document). The rules specific to Fort Barry residences are set forth below, and are subject to revision from time to time by the NPS as it determines necessary.

d) Tenants are expected and required to consult with the Property Manager prior to engaging in any activity or activities for which the Tenants have any questions or uncertainty regarding the extent to which the Fort Mason Residential Rules or any other NPS regulations, rules, or procedures govern the activity or activities.

2. PROPERTY MANAGER INFORMATION

a) The GGNRA Realty Specialist will be the Property Manager to handle all matters related to Fort Barry residences. The Property Manager is Joe Llewellyn. Office hours are 9:00 am to 5:00 pm, Monday through Friday. The telephone number is (415) 561-4729; fax is (415) 561-4940. The emergency phone number for after hours is (415) 561-5505.

b) All maintenance requests to repair or service anything within the Premises, or to obtain the written approval of the NPS pursuant to the requirements of the Lease or these Rules, must be made through the Property Manager.

c) If an emergency occurs after normal business hours and requires emergency repair, such as water leaks, downed power lines or spilled sewage, and you are unable to contact the Property Manager, then contact Park Dispatch at (415) 561-5505.

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3. BUILDING MAINTENANCE & ALTERATIONS

a) Tenants are required to conduct housekeeping, routine maintenance (i.e., all items of maintenance whose cost is less than \$25), and building monitoring so as to protect the longevity of their Premises. In addition, Tenants are allowed to make **only** the following interior alterations without prior written approval from the NPS:

- i) installing a moderate number of picture nails/hangers in plaster or sheetrock walls (**no nails or hangars are allowed in wood trim or paneling**); or
- ii) installing the minimum number of wall-mounted furniture anchors needed for seismic safety in plaster or sheetrock walls (**no hangars in wood floors or wood trim or paneling**).

b) The NPS provides appropriate window coverings. Tenants desiring additional window coverings must contact the Property Manager for approval and for an estimate of the charge for the Property Manager to install such additional window covering.

c) In the event that the Premises is provided with hardwood floors, Tenants must keep at least 50% of such areas covered with floor rugs or similar coverings for protection.

d) Tenants shall not undertake any alterations or repairs to their Premises, including changing or removing existing window coverings, making new telephone or cable television installations, or installing temporary equipment or facilities, including but not limited to washing machines, clothes dryers, portable dishwashers, deep-freeze units (or other such appliances), or pianos without the prior written approval of the NPS.

- i) The Property Manager will arrange contractors for new telephone or cable television or other telecommunications wiring to ensure that such work is consistent with historic preservation requirements. Tenants shall be responsible for the expense of such installation. **Under no circumstances are Tenants to perform such wiring themselves or allow any contractor or utility company, including but not limited to Pacific Bell or TCI Cablevision, to perform such wiring.**

e) Tenants shall not redecorate, paint, refinish floors, carpet, plaster, stencil or decorate walls, or otherwise alter the Premises in any way. Tenants shall not apply adhesive paper to any cabinets, walls, or doors; nor shall Tenants hang any plants, planters or lighting fixtures from ceilings or walls, nor shall Tenant tack, nail or glue any coverings to floors or walls without the prior written approval of the NPS.

f) No alterations shall be made to the exterior of any building without prior written approval from the NPS. Exterior alterations include but are not limited to painting, installation of television or other antennae, satellite dishes, fencing, planter boxes, recreation equipment (including but not limited to basketball backboards), and temporary alterations such as holiday lights.

g) The construction or attachment of new decks and/or porches onto any building, or in the associated landscape, is prohibited. Repairs to existing porches should be requested through the Property Manager.

h) Lessee shall pay for any repairs to the property caused by Lessee's negligence or misuse or that of Lessee's invitees.

4. LANDSCAPE MAINTENANCE & ALTERATIONS

a) Landscape Maintenance

NPS maintenance staff will mow and keep up front and back yard lawns and perform routine trimming and pruning of front and back yard vegetation. Any questions, reporting of landscaping problems, or requests for additional landscaping should be directed to the Property Manager who will then work with the NPS maintenance staff.

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b) Landscape Alterations

Tenants shall not undertake any landscape alteration, new installation or ground-disturbing activity without the prior written approval of the NPS. Actions requiring NPS approval include (but are not limited to) the following:

c) General Landscape Alterations

i) New gardens

Because of lead-based paint in soil concerns, the creation of new lawns or gardens is prohibited. Contained gardens, where small-scale vegetable and/or flower gardens are planted in removable tubs or pots, are permitted. Tenants must submit contained garden plans for prior written approval by the NPS before beginning work.

ii) Changes to existing gardens and foundation beds

Many existing gardens and foundation beds contain historic plant materials that must be preserved. Further, the soil in these beds may be contaminated with lead based paint. Therefore, Tenants shall not make any changes to existing lawns, gardens or foundation beds, or create new foundation beds without the prior written approval of the NPS.

iii) Trees and Shrubs

Major pruning or cutting of trees is prohibited. Attaching any items, including but not limited to fencing, dog chains, antennae, swings, tires, treehouses, or other play equipment, on any Fort Barry tree or shrub is prohibited.

iv) New Trees and Shrubs

Tenants shall not plant any new trees and/or shrubs without the prior written approval of the NPS. Planting new trees and shrubs may be approved in select locations where they existed historically, to replace hazardous trees, or in areas where new plantings will not have a negative impact on the historic value.

v) Irrigation Systems

The installation of private irrigation systems is prohibited. However, Tenants are expected to water lawns and gardens as necessary to maintain them in good condition.

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d) New Construction and/or New Installations within the Landscape

i) Fences

Tenants shall not install any fence without the prior written approval of the NPS. Because fences can be highly visible and can significantly change an historic scene, residents who wish to install fencing must first obtain written approval from the NPS. Construction of some types of fencing for children and/or animal enclosures may be permitted on a limited basis. Use of a dog leash run, rather than installation of a new fence, is encouraged. Approved fences must conform with NPS design and construction stipulations.

ii) Dog Houses

Tenants may not install any type of doghouse without the prior written approval of the NPS. Temporary doghouses may be permitted, subject to the prior written approval of the NPS, and will be required to conform with NPS design and construction stipulations. Residents who install a doghouse are responsible for removing it prior to termination of occupancy.

iii) Play Sets

The placement or installation of play sets requires the prior written approval of the NPS. Temporary children's play sets, no larger than 10 feet x 10 feet, may be permitted, subject to the prior written approval of NPS. Residents who install a play set are responsible for removing it prior to termination of occupancy, and must keep it in safe and attractive condition. Written approval by the NPS does not limit or change in any way Lessee's indemnification obligations pursuant to the Lease.

iv) Storage Sheds and Greenhouses

The construction or installation of storage sheds or greenhouses is prohibited.

v) Hot Tubs

The installation of hot tubs, in either the Premises or adjoining yards, is prohibited.

vi) Swimming Pools

Any type of permanent in-ground or above ground swimming pool is prohibited. Children's wading pools, no larger than 6 feet in diameter and 1 foot deep, are permitted, provided that the tenant removes the wading pool at the end of each use to prevent the deterioration of the lawn underneath.

vii) Sand Boxes

Placement or installation of sandboxes is prohibited without the prior written approval of the NPS. Temporary sandboxes, no larger than 6 feet x 6 feet, may be permitted, subject to the prior written approval of NPS. Residents who install a sand box are responsible for removing it prior to termination of occupancy. Written approval by the NPS does not limit or change in any way Lessee's indemnification obligations pursuant to the Lease.

viii) Recreation Installations

The attachment of a basketball backboard or any recreation equipment to any part of a building (i.e., roof, wall, garage, door, etc.) is prohibited. The permanent installation of any recreation equipment (i.e., tennis courts or netting, volleyball nets, etc.) in the landscape is prohibited.

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Installation of temporary and portable recreation equipment is permitted, provided that the tenant places and uses such equipment so as to avoid damage to existing vegetation or landscape features. Written approval by the NPS does not limit or change in any way Lessee's indemnification obligations pursuant to the Lease.

ix) Yard Installations and Garden Ornaments

Permanent yard installations, such as birdbaths, water fountains and barbecue pits, that require permanent foundations (such as concrete pads), are prohibited.

Temporary and portable yard installations, such as picnic tables, portable barbecues, volleyball nets and tarps, are permitted.

x) Satellite Dishes

The installation of any satellite dish, on either a building's exterior or in the landscape, is prohibited without the prior written approval of the NPS.

xi) Clothes Lines

No exterior clotheslines shall be erected or maintained and there shall be no outside laundering or drying of clothes. No draping of towels, carpets, or laundry over exterior railings shall be allowed.

xii) Exterior Lighting

The installation of decorative landscape lighting is prohibited.

Tenants shall not install safety or other types of lighting, including holiday lights, without the prior written approval of the NPS.

e) Ground Disturbance

Major digging or other ground disturbance, other than small-scale gardening pursuant to an NPS-approved garden plan, is prohibited at Fort Barry. Major digging is not permitted because of the possible damage to the landscape, undocumented archeological resources, underground utilities, and potential contact with lead based paint contamination.

5. FIRE PREVENTION AND PROTECTION

a) Fire Extinguishers

The Property Manager is responsible for ensuring that the Premises has a functioning fire extinguisher approved by the NPS Presidio Fire Department. Tenants are advised to keep their Premises' fire extinguisher in an accessible place within the Premises.

b) Smoke Alarms

It is against the law to remove or tamper with a smoke detector. If Tenants believe that their smoke detector requires maintenance, they must immediately contact the Property Manager. Tenants are responsible for all costs of repair or replacement arising from misuse of their smoke detectors.

c) Electrical Loads and Extension Cords

i) Fort Barry residences have the limited electrical capacity typical of most older homes; most buildings have 100 amp service. Running numerous electrical devices simultaneously,

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particularly on the same circuit, may overload this limited electrical capacity and cause circuit breakers to trip or fuses to melt.

ii) All electrical devices used in Fort Barry residences must be UL-listed.

iii) Tenants are responsible for managing their electrical usage so as to avoid tripping circuit breakers. **OVERLOADED CIRCUITS ARE A FIRE HAZARD AND HAVE CAUSED RESIDENTIAL FIRES IN THE PARK!** Tenants must not remove grounding plugs from electrical devices to make them fit in non-grounded outlets. The NPS is not responsible for damage to any electrical devices or any losses arising from unanticipated power failures or improper usage. Tenants with sensitive electrical devices, such as computers, are advised to consider purchasing surge protectors or Uninterruptible Power Supplies (UPS) for those devices.

iv) Use of extension cords is prohibited because a mismatch between the electrical capacity of an extension cord and the circuit it is plugged into can easily result in a fire. Tenants requiring an electrical outlet in another location may use extension outlet strips of an appropriate rating which contain an internal circuit breaker to shut them off if they are overloaded.

v) The Property Manager is able to install additional electrical outlets and capacity at Tenant expense, pursuant to historic preservation requirements.

d) Fireplaces

The use of all fireplaces is prohibited. After the 1989 Loma Prieta earthquake, it was determined that the fireplaces were unsafe to use because of fire safety hazards and their impaired structural integrity. The use of fireplaces, because they are an inefficient heat source, conflicts with the goal to make the park a model of environmental sustainability.

e) Heating Units

Closets containing heating units or hot water tanks must not be used for storage.

f) Supplemental Electric Space Heaters

Supplemental electric space heaters are permitted, however, residents are cautioned that units which draw significant electrical energy may overload the electrical system of their Premises and cause circuit breakers to trip.

g) Storage of Flammable Materials

Tenants are prohibited from improperly storing in or around their Premises or assigned garage any possessions that might create a fire hazard, or any other objectionable article.

Tenants must keep all flammable products away from heat sources, in approved containers, and out of children's reach.

h) Barbecue Grills

The use of temporary barbecue grills is prohibited within 10 feet of structural walls or flammable materials. Barbecue grills may be used in back yards only. Tenants must never leave an active barbecue grill unattended.

i) Fireworks

Fireworks of any type are prohibited.

j) Fires

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Open fires are prohibited.

6. HAZARDOUS MATERIALS; PEST AND WEED CONTROL

a) Lead Paint

All Tenants will receive a booklet discussing the potential for and hazards of lead-based paint in and around their Premises. Also, due to potential lead based paint in the soil surrounding the building, Tenants should prevent their children from eating or playing with the soil within three (3) feet of a building's dripline and around other painted structures. The NPS reserves the right to disturb the Premises' adjacent soil and/or plantings at any time in order to abate possible hazardous conditions. (See previous limitations regarding Tenant changes to landscape conditions).

b) Asbestos

Tenants should be aware their Premises may have asbestos-containing materials (ACM) which must be handled in accordance with applicable legal requirements. The NPS has completed surveys documenting the location of ACM in all properties, and these are available for Tenant inspection through the Property Manager.

c) Pest and Weed Control

The NPS is a leader in the use of Integrated Pest Management (IPM) which stresses the use of natural rather than chemical solutions for pest problems. Accordingly, **Tenants are not allowed to use or keep pesticides, herbicides, fungicides, etc. within or adjacent to their Premises (including back yards) without the prior written permission of the NPS (including retail products such as Raid, Black Flag, etc.).** Tenants experiencing pest problems must contact the Property Manager for advice on appropriate IPM solutions, or to obtain permission for use of chemical agents if there is no feasible IPM solution.

d) Disposal of Residential Toxic or Hazardous Materials

Toxic and hazardous materials such as paint, paint thinner, motor oil (new or used), pesticides or herbicides approved in writing by the NPS, and household cleaners may not be disposed of with the regular household refuse service. The City and County of San Francisco maintains a Household Hazardous Waste Collection Facility at 501 Tunnel Avenue in San Francisco. For more information, please call (415) 554-4333.

7. GARBAGE, REFUSE AND RECYCLING DISPOSAL

All rubbish, trash, garbage and recycling materials (except toxic or hazardous materials) must be placed by Tenants in the containers provided by the NPS' refuse and recycling contractor(s) and placed on the days and in the location identified by the contractor(s) for pickup. Tenants must return empty containers to the Premises no later than the end of the day for pickup.

8. PLUMBING

a) Disposal in plumbing fixtures

The disposal of sanitary napkins, tampons, large amounts of food or kitchen waste, sweepings, matches, rags, or any other inappropriate item down the plumbing fixtures is prohibited. The disposal or flushing of any waste cooking oils, trimmed fat or bones down any drain is prohibited. Tenants are responsible for the cost of repairs resulting from placing prohibited items into plumbing fixtures.

9. PETS

Pets will be allowed on a case by case basis, subject to prior written approval by the Property Manager.

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10. RESOURCE PROTECTION

a) Taking of Wildlife

Federal regulations prohibit the taking of wildlife, as well as the feeding, touching, or intentional disturbance of any wildlife in a national park.

b) Plant Life

Federal regulations prohibit destroying, removing, or digging plants, or parts of plants, within a National Park, except within residential areas. The specified residential area for Fort Barry residences is the back yard adjacent to the Premises.

c) Artifacts

Federal regulations prohibit possessing, destroying, injuring, defacing, removing, digging or disturbing nonfossilized and fossilized paleontological specimens, cultural or archeological resources, or the parts thereof.

Any historic artifacts found on Fort Barry are the property of the NPS. If you find historic artifacts, such as objects or fragments of stone, shell, metal, ceramic or glass, they should not be disturbed or moved from their setting and should be reported to the Park Archeologist at (415) 561-4832.

11. PARKING

a) Parking Areas

Tenants and guests must observe "No Parking" areas designated by red curbs and/or "No Parking" signs. Parking on lawn or seeded areas is prohibited. Obstructing any parking areas and/or driveways is prohibited.

b) Recreational Vehicles

Recreational vehicles, including but not limited to boats, motor homes, trailers, campers, jet skis, or similar equipment may not be parked and/or stored anywhere at Fort Barry, except within enclosed garages where they are not visible from any exterior area. Additional parking permits will not be issued because a designated garage space is being used for parking or storing recreational vehicles.

c) Residential Parking

Parking in Fort Barry housing areas is only available for residents and their guests. Residential parking is available either on the street or in assigned garages. Residents and their guests must display any parking permits or placards provided to them by the NPS.

d) Abandoned Vehicles

Abandoning vehicles is prohibited at Fort Barry. Parking of non-functional vehicles on blocks is prohibited. Long-term parking of non-resident vehicles is prohibited.

Any vehicle not belonging to a Fort Barry resident that is parked at Fort Barry for more than three consecutive days will be considered abandoned and will be towed away. Notwithstanding any other provision of these Rules or of the applicable Lease, these three days shall be computed by including all Saturdays, Sundays, and Federal holidays. If your vehicle is towed, call Park Dispatch at (415) 561-5505.

12. POWER EQUIPMENT AND MAINTENANCE

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No power equipment, hobby shops, or car maintenance (other than emergency work), or boat maintenance shall be conducted within the Premises or anywhere within Fort Barry without the prior written approval of the NPS. In considering approval, NPS will consider the effects of noise, air pollution, dirt or grease, fire hazard, telecommunications interference, or objections by other Fort Barry residents and visitors. All hazardous waste generated by tenant activities must be disposed of pursuant to Section 6 of these Fort Mason Residential Rules.

13. COMMERCIAL ACTIVITIES

Tenants wishing to establish home businesses within Fort Barry must obtain written approval from the NPS prior to operating such businesses. Home businesses include both for-profit and not-for-profit businesses of a continuing nature. Persons having home businesses must comply with all Federal, State and local laws and regulations. The failure to do so is grounds for termination of the Lease.

The conduct of a home business shall not impose any liability or obligation of any type on the Government (e.g., security, utility services, waste disposal, etc.)

Home businesses may be approved by the NPS if they meet the following criteria:

- a) The business activity shall not interfere with the NPS mission, shall not endanger resources, shall not interfere with NPS programs, shall not impact visitor use, shall not interfere with employee duties, shall not compete with a concessioner or provide a "visitor service."
- b) The business activity shall not create a nuisance (such as parking problems, noise, etc.) or visual impairment.
- c) The business activity shall not involve the use of government quarters as a store or facility where the general public may come to transact business.
- d) The business activity shall not involve the use of residential quarters as rental space for overnight accommodations or involve the sublease of quarters.
- e) The business activity shall not involve door-to-door solicitation in the park, or any form of visitor solicitation.
- f) The business activity shall not involve advertising or signs or notices in park areas.

14. SIGNS

Tenants must not install signs which are visible from the exterior of their Premises without the prior written approval of the NPS. Signs requiring the prior written approval of the NPS include building numbers, signs with tenant names, temporary banners, any flags (except American flags of an appropriate size displayed on federal holidays), and so on. Because the GGNRA is federal property, Tenants will not be permitted to place political signs in yards adjacent to their Premises or where they are visible from outside their Premises. Requests for permission to install signs, or any questions, should be directed to the Property Manager.

15. MISCELLANEOUS

a) Noise

Tenants shall not make or permit any noise, odors, or vibrations that are annoying, unpleasant, or distasteful, or that would interfere in any way with NPS use or administration of Fort Barry or the quiet enjoyment of other Fort Barry occupants or park visitors, or that exceed limits set forth in noise ordinances of the County of Marin.

b) Moving In/Out

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Tenants must notify the Property Manager of the date when they will commence or stop occupying the Premises. Tenants must notify the Property Manager of the actual date(s) they will be moving in or out and the vehicles which will be used for moving, including those of movers, and must comply with directions from the Property Manager on parking vehicles used for moving..

c) Additional Regulations

Tenants and all other persons or entities on Fort Barry are additionally subject to NPS system-wide regulations governing the use of National Park system lands, and should familiarize themselves with such regulations. Applicable documents are listed below, and are available for review at the Property Manager's office.

- i) Title 36 Code of Federal Regulations (36 CFR)
- ii) Golden Gate National Recreation Area Compendium
- iii) General Management Plan for the Golden Gate National Recreation Area and Environmental Assessment (GMP/EA)
- iv) Secretary of the Interior's Standards for Rehabilitation
- v) Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes

“Golden Gate National Recreation Area Dog Management Negotiated Rulemaking Assessment”

Request for additional information

1) Please clarify for us the anticipated role and responsibilities for each member of your team, and especially that of the team lead. Please describe how the hours allocated to the designated “team lead” in your written proposal relate to carrying out those responsibilities. Please address roles during the assessment process as well as during the proposed Negotiated Rulemaking process.

Greg Bourne will be taking the lead in meetings with the GGNRA leadership and developing the overall approach to conducting the project. He will be responsible for making interview assignments and overseeing the work of the CCP Project Team during the assessment phase. The total interviews anticipated will be divided approximately equally among the CCP team. If there are strategic reasons for matching a particular member of the CCP team with a specific stakeholder, those decisions will be made in concert with GGNRA leadership.

Each member of the CCP team will contribute to the assessment report based on the insights gained from the interviews. Catherine McCracken will be assigned the role of integrating the various contributions, but Bourne will oversee that process and provide editorial review. This will be a cost-effective approach to producing the assessment report in contrast to Bourne taking sole responsibility for writing the report.

Working with GGNRA, Bourne will take the lead role not only in designing the assessment but in the negotiated rulemaking process as well. As envisioned, Bourne will facilitate the sessions of the negotiated rulemaking FACA Committee if the project proceeds to that phase.

Several strategic decisions will need to be made related to the negotiated rulemaking phase. Is GGNRA staff available to write documents emanating from the process or does GGNRA prefer CCP to handle that aspect of the project? We have assigned Catherine McCracken to prepare those documents if CCP conducts that task. We anticipate using a “single negotiated text” to ensure the key issues, alternatives and outcomes are accurately portrayed and key differences resolved.

Will Subcommittees be required? From experience, it is likely Subcommittees will be needed to work out the details of specific aspects of the rule. If Subcommittees are formed, we anticipate utilizing co-facilitators, pairing up members of the CCP team. Particularly if CCP is tasked with writing negotiated rulemaking documents, having co-facilitators allows one person to manage the meeting while the other pays particular attention to concepts and language that would comprise a rule. Some “real-time wordsmithing” will likely be required at some meetings, and a two-person team makes that process much more efficient.

Given the currently proposed timeframe for the project, it is likely Gina Bartlett could return from maternity leave and contribute during the latter phases of the project as needed. Her maternity leave is scheduled from August 2003 through January 2004 so she may well be able to contribute to tasks that occur after her return.

2) Please describe your expectations and preferred role of the U.S. Institute's project manager, with regard to your team, as well as with GGNRA staff and stakeholders.

CCP believes the U.S. Institute brings a wealth of experience and information to the process that will be valuable. The Institute has worked with many agencies and organizations in the application of the various Federal statutes that will apply to this project. The Institute's project manager will bring important insights to the project both in the developmental stage and as the project is proceeding. This is particularly relevant given the challenges of integrating NEPA with negotiated rulemaking. The Institute's project manager can assist in the process of reviewing proposed approaches and assuring that the project is operating in compliance with Federal guidelines.

Assistance in making strategic decisions about proceeding to the negotiated rulemaking phase could also prove valuable. Even after the group is selected to assist GGNRA with the project, the Institute provides GGNRA with yet another resource to enhance the likelihood of success. The Institute's Project Manager has worked closely with GGNRA over a period of time and is intimately familiar with many of the dynamics that could affect the negotiated rulemaking process. This will likely prove extremely valuable during the course of the project. Finally, the Institute plays an important role in overseeing the administration of the contract. This allows CCP to focus more on the substance of the project and less on the administrative matters that sometimes consume considerable time and resources.

3) Please review and specify the experience of your individual team members (not the collective experience of your organization) with projects that have involved NEPA, FACA, or Negotiated Rulemaking.

Negotiated Rulemaking

Bourne: 1) City of Atlanta, Historic Preservation Ordinance (1987/88). Bourne served as part of a four-person team, each with equal responsibilities for the overall success of the project. Bourne was designated as one of two lead contacts with the City during the course of the project. He facilitated both the primary Steering Committee as well as a technical subcommittee.

2) U.S. Department of Education, Higher Education Act Amendments of 1998 (1998/99). Bourne was again part of a four-person team assigned to the project, with each taking equal responsibility for the outcome of the project. In this instance, four committees, each addressing one of four distinct components of the Amendments, were established. Bourne worked with one other team member to facilitate/mediate two of the four committees.

3) South Coast Air Quality Management District, Pilot Negotiated Rulemaking on Chromium and Nickel Emissions (2002/03). In this project, Bourne served as the sole mediator for the project. He facilitated/mediated both the primary Steering Committee and subcommittees.

McInerny:

1) Winter Recreation Needs Assessment – Town of Mammoth Lakes and US Forest

Service. McInerny is facilitating a winter recreation needs assessment survey process aimed at identifying potential solutions to use conflicts between motorized snowmobilers, cross country skiers, dog walkers, and snowshoers. The process may result in the formation of an advisory committee to help develop additional regulations and recommendations for additional trails.

NEPA

Bartlett: 1) Campus Parkway Alignment Study: Bartlett designed a process for public information and involvement for the NEPA analysis of a roadway leading to a new university campus in Merced. Public concerns focused on vernal pools, native species, traffic congestion, and regional transportation management.

2) Central Valley Project Improvement Act, Public Involvement Program: Bartlett conducted public outreach and prepared public outreach materials for the Bureau of Reclamation beginning with the release of the Draft Environmental Impact Statement (EIS) through the release of the final EIS for this legislation that significantly changed operation of the Central Valley Project. Stakeholders represented environmental, fishing, water, recreation, and business interests throughout most of the State of California.

Bourne: As an environmental consultant in the late 1970's and early 1980's, Bourne conducted several Environmental Impact Statements for the U.S. Environmental Protection Agency, Region IV. Most of these were related to water resources projects in various locations throughout the Southeast. In these projects, Bourne was responsible for public involvement, as well as oversight of the technical analyses and preparation of the EIS documents. In the past three years, Bourne has been involved with the following projects involving NEPA/CEQA.

1) South Coast AQMD Negotiation Rulemaking, Los Angeles, CA. Like the proposed GGNRA negotiated rulemaking project, this project required conducting a negotiated rulemaking process in concert with NEPA/CEQA. AQMD modified their traditional approach to applying NEPA/CEQA to make the process more consistent with the goals of the rulemaking project. The lessons learned from this project should be valuable for the GGNRA project.

2) Coconino National Forest, U.S. Forest Service, Flagstaff, AZ. Two projects, one concerning pronghorn antelope management and the other a landscape scale assessment, both are integrally related to several EISs either previously or currently being conducted on the Forest. The former project was completed in 2002 but the latter project is ongoing.

McCracken: 1) As a Community Involvement Specialist in the Superfund Program of the USEPA Region 9 office, McCracken worked on long-term remediation of Superfund sites. The process of defining remediation alternatives and the associated required public review, comment, and response to comments process were similar to NEPA requirements, with the process culminating in a preferred alternative to be formally adopted in an Agency Record of Decision.

2) Many of the projects recommended in the River Corridor Management Plan for the Lower American River require CEQA and/or NEPA review before they can be implemented. As co-facilitator of the Lower American River Task Force, McCracken has worked with several agencies

(Sacramento Area Flood Control Agency, U.S. Bureau of Reclamation, Sacramento Department of Environmental Review and Assessment) to inform and involve members of the Task Force of the public participation opportunities under CEQA/NEPA.

McInerny: 1) Upper Guadalupe River Flood Protection Project EIS/EIR, San Jose, California. Joint NEPA/CEQA project, US Army Corps of Engineers (lead federal agency) and Santa Clara Valley Water District (lead state agency). McInerny managed and assisted in preparation of Final Environmental Impact Report/Statement, including development of extensive responses to comments on the draft environmental document. The Final EIR/S received the Association of Environmental Professional's 2001 Award for Outstanding Environmental Document.

2) Guadalupe River Flood Control Project Collaborative, San Jose, California. Joint NEPA/CEQA project, US Army Corps of Engineers (lead federal agency) and Santa Clara Valley Water District (lead state agency). Managed and co-facilitated the Guadalupe River Flood Control Project Collaborative charged with developing an agreement on an acceptable flood control and mitigation plan for a critical reach of the Guadalupe River in downtown San Jose, California. Parties to the dialogue included the Sacramento and San Francisco Districts of the Corps, USFWS, NMFS, California Department of Fish and Game, State Water Resources Control Board, City of San Jose, Santa Clara Valley Water District, and the Natural Heritage Institute which represented various environmental groups. All parties ratified a settlement agreement that avoided litigation and allowed construction to proceed.

3) Santa Rosa and San Jacinto Mountains National Monument Federal Advisory Committee, Palm Springs, California. Bureau of Land Management and US Forest Service. Served as Lead facilitator and collaborative process designer for the Advisory Committee's efforts to create a set of planning recommendations to BLM and USFS staff regarding the development of their Joint Land and Resource Management Plan. McInerny received a letter of commendation from the Committee's chairperson and the National Monument Manager.

4) Combined Array for Research in Millimeter-Wave Astronomy, Bishop, California. The U.S. Forest Service (lead federal agency) and the University of California (lead state agency) developed a joint NEPA/CEQA environmental review for a proposed research facility to be located in the Inyo National Forest. Assisted the project sponsors prepare materials for use at two public scoping meetings as well as with local Native American tribal interests. Facilitated two public meetings aimed at identifying key issues for analysis during the environmental review.

5) Bel Marin Keys Unit V Conceptual Plan for Wetland Restoration, Novato, California. The California Coastal Conservancy, in cooperation with the San Francisco Bay Conservation and Development Commission and the U.S. Army Corps of Engineers, analyzed the development of a Conceptual Wetland Restoration Plan for the approximately 1,600-acre Bel Marin Keys Unit V property located in southeast Marin County. McInerny managed the development of restoration goals and objectives and preparation of three conceptual design alternatives with input from a Technical Advisory Committee (TAC) consisting of various federal, state, and local government agencies as well as consultants. Oversaw a wide-reaching public outreach program which included the use of directed mailings, a project website, newsletters, and two public workshops. Assisted the Conservancy prepare for, execute, and debrief two TAC meetings and two public meetings.

6) Jepson Parkway Environmental Impact Report/Environmental Impact Statement, Solano County, California. Working for the Solano Transportation Authority, McInerny prepared for and executed a one-day workshop to develop a project needs and purpose statement as required for NEPA/404 Memorandum of Understanding. Participants included Caltrans, FHWA, USFWS, DFG, and various city and county agencies.

FACA

Bourne: Working with numerous Federal agencies during the last two decades, Bourne has been involved with projects that implemented FACA committees as well as those which required analyses as to whether FACA would apply given the nature of the project. For example, two projects conducted for the U.S. Forest Service required an assessment of whether a FACA committee was required before a decision could be made to proceed with a collaborative process. Bourne has worked on several projects, however, that required the establishment of a formal FACA committee, including:

- 1) Negotiated Rulemaking Committee, U.S. Department of Education, Washington, D.C.
- 2) Phosphoric Acid Policy Negotiation Steering Committee, U.S. Environmental Protection Agency, Washington, D.C.
- 3) Printing Industry Common Sense Initiative Steering Committee, U.S. Environmental Protection Agency, Washington, D.C.

McInerny: 1) Santa Rosa and San Jacinto Mountains National Monument EIS – Bureau of Land Management and US Forest Service. See description above.

2) Upper Klamath Basin Working Group – Bureau of Land Management (managed by U.S. Institute for Environmental Conflict Resolution). Served as facilitator and conducted in-depth stakeholder interviews aimed at clarifying the various concerns, issues, and expectations for a proposed ecosystem restoration planning process. Summarized interview findings in a situation assessment memorandum presented to the Upper Klamath Basin Working Group. Stakeholders represented in this process included seven federal agencies—U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), Natural Resource Conservation Service (NRCS), Bureau of Reclamation (BR), Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), and U.S. Forest Service (USFS) —various local municipalities and state agencies; three Klamath Indian Tribes; key environmental groups; and assorted local interests (e.g., commercial fisheries, and the ranching and farming community).

4) Please briefly describe how you would approach designing and facilitating a collaborative process that integrates Negotiated Rulemaking with a NEPA EIS process.

While the final proposed design for the negotiated rulemaking process will not be known until after the assessment is completed, the Center for Collaborative Policy (Center) believes a concurrent, yet slightly staggered, negotiated rulemaking and NEPA process will yield considerable time and resource savings by integrating public comment periods and planning resources. The Center's proposed approach (presented in Figure 1 as an attachment), is a blend of the two approaches

presented by the Federal Panel of senior federal officials convened to advise the Superintendent of Golden Gate National Recreation Area (GGNRA) whether GGNRA should proceed with a negotiated rulemaking process. Please keep in mind, however, that the assessment and more detailed discussions with GGNRA staff and the IECR Project Manager will likely lead to further refinements.

The blended process essentially follows 9 steps, which are described below.

Step 1: Publication of a Notice of Proposed Rulemaking and identification of key GGNRA staff to be involved and lead the overall process.

Step 2: Conduct Assessment to identify issues and individuals who could serve on negotiated rulemaking Committee. Assessment process will determine if a negotiated rulemaking process is appropriate and, if so, the overall design of the process. During this step, GGNRA will also prepare a Notice of Intent (NOI) for an Environmental Impact Statement and initiate the NEPA-compliant scoping process. In addition, staff and the Center will work together to refine the project mailing list for use in distributing the NOI.

Step 3: Assuming the Assessment recommends a negotiated rulemaking process be undertaken, GGNRA will work with the neutral convener and the USIECR to establish the Federal Advisory Committee Act-compliant Negotiated Rulemaking Committee. The first meeting of the Committee would be dedicated to discussing the Committee's charter and establishing operating protocols, timelines, goals and objectives, and public outreach tasks.

Step 4: Working with the Committee, GGNRA staff would prepare for and convene a public meeting to solicit comments from the public regarding issues they want analyzed in the Draft Environmental Impact Statement (DEIS).

Step 5: Drawing on the comments received during scoping, the Committee would hold additional meetings to develop a preliminary preferred dog management strategy. In addition, the Committee would also identify and develop feasible alternatives to the preliminary preferred dog management strategy.

GGNRA staff would develop a Draft EIS to analyze the potential direct and indirect environmental impacts resulting from the various dog management strategies proposed by the Committee. A "No-Action" alternative would be included in the analysis as well as any proposed mitigation and adaptive management and monitoring procedures.

Step 6: The DEIS would be published and widely circulated for review and comment. The GGNRA would conduct a public hearing to receive formal comments on the DEIS. Depending on the circumstances at the time, an extension to the minimum comment period of 45 days might be considered.

Step 7: After the close of the public comment period, the Committee and GGNRA staff would hold an additional meeting(s) to discuss the comments received and prepare formal responses. In

addition, the Committee and staff would discuss how, if at all, the preferred dog management strategy should be modified.

Step 8: Upon completion of response to comments on the DEIS and revisions, if any, to the preferred dog management strategy, a Final EIS would be prepared and published for public review. The FEIS would be filed with the EPA's Office of Federal Activities. The public review period must be at minimum 30 days.

Step 9: While there is no requirement for GGNRA to respond to comments received on the FEIS, the administrative record will reflect how GGNRA considered any and all comments prior to making a decision on the final proposed management strategy. GGNRA would adopt the FEIS and make a decision on the proposed management strategy. At this time the Record of Decision/Final Rule would be prepared and the Committee's work would be completed.

5) Please list previous projects for each team member, for which he or she played a substantial direct facilitation role, that come closest to involving a comparable level of controversy, complexity, polarization of viewpoints, values-based conflict, and emotional intensity as is anticipated with the GGNRA dog management issue. Please list the time period of the projects, along with a rough estimate of the number of hours of service provided by the individual team member. In addition, please provide 3-4 participant references for each project (with phone contact information) that covers a range of stakeholder interests. Please provide names of people not only familiar with the team member's role in the referenced project, but also likely to be accessible via telephone in the next two weeks.

Bartlett

California Water Plan Update 2003

Timeframe: January 2002-December 2003

Hours: Approximately 20-30 hours per week for 2 years (about 2500 hours)

Participant References:

- 1) Anisa Divine, Senior Water Resources Planner, Imperial Irrigation District, 760.339.9036
- 2) Jay Lund, Professor, Civil & Environmental Engineering, University of California - Davis, 530.752.5671
- 3) Scott Matyac, Agriculture and Urban Water Use, Department of Water Resources, 916.654.6265
- 4) Arnold Whitridge, Former Supervisor, Trinity County, 530.623.6688

Butte County Integrated Storage Investigation

Timeframe: Fall 2000 through Summer 2001

Hours: Estimate 600 hours on the project.

Participant References:

- 1) Linda Cole, 530.343.0916 (represents groundwater interests and League of Women Voters)
- 2) Matt Colwell, Former Manager Western Canal Water District (now Project Manager at CDM, Inc.). 916.567.9900
- 3) Ed Craddock, Butte County Department of Water & Resource Conservation, 530.538.4343
- 4) Toccoy Dudley, Dept of Water Resources, Northern District, 530.539.7383

American River Parkway Plan Update

Timeframe: August 2000-July 2001 and September 2003-ongoing

Hours: August 2000-July 2001- 500 hours; September 2003-ongoing - 200 hours

Participant References:

- 1) Lea Brooks, Sacramento Area Bicycle Advocates, 916.440.7652
- 2) Al Freitas, Environmental Council of Sacramento, 916.485.3528
- 3) Connie Miottel, Capitol Station District, 916.321.5599

Bourne

Bourne has conducted numerous projects with value-based conflicts and similar levels of complexity and emotional intensity. These include public hearings for the Department of Energy on siting a high-level nuclear water repository, the City of Atlanta negotiated rulemaking process on historic preservation, the negotiations on the Big Cypress National Reserve, the Scientific Summit on the Red-Cockaded Woodpecker, the Common Sense Initiative for the Printing Industry, the Environmental Justice Assessment in Louisiana, and numerous other projects. These projects ranged from six months to four years in duration. Since many of these projects were conducted several years ago, however, they are not included below. Many participants have changed organizations, locations, etc., and would be difficult to track down. Nonetheless, if more information on these projects is desired, we will be glad to collect and convey the needed contact information. Instead, the list below focuses on more recent projects. All have either been conducted within the past two years or are ongoing.

South Coast Air Quality Management District Pilot Negotiated Rulemaking

Timeframe: 2002-2003

Hours: 375

Participant References:

- 1) Jill Whynot, South Coast Air Quality Management District, Project Manager, Tel: 909.396.3104
- 2) Bahram Fazelli, Communities for a Better Environment, Tel: 323.826.9771, Ext.100
- 3) Dan Cunningham, Metal Finishing Association of Southern California, President, Tel: 310.373.5336

California State Water Desalination Task Force

Timeframe: February 2003 - ongoing

Hours: 580

Participant References:

- Jonas Minton, Department of Water Resources, Former Deputy Director, Tel: 916.446.2041
Jeffry Blanchfield, San Francisco Bay Conservation and Development Commission, Chief Planner, Tel: 415.352.3654
Jared Huffman, NRDC, Tel: 415.777.0220
Ken Wattier, Long Beach Water Department, General Manager, Tel: 562.570.2301

Coconino National Forest Pronghorn Management

Timeframe: 2001 - 2002

Hours: 120

Participant References:

Rodger Zanatto, U.S. Forest Service, Coconino National Forest, Former Stewardship Officer, Tel: 928.699.3005

Mandy Metzger, Diablo Trust/Rancher, Tel: 928.779.5485

Dave Brown, Arizona Antelope Foundation, Tel: 480.965.5752

Coconino National Forest Landscape Scale Assessment

Timeframe: January 2003 - ongoing

Hours: 80

Participant References:

Carol Holland, U.S. Forest Service, Coconino National Forest, LSA Project Team Leader, Tel: 928.477.2255

Don Farmer, Arizona Wildlife Federation, Tel: 480.200.8687

Elaine Morrall, Northern Arizona Audubon Society, Tel: 928.526.1022

Nicholas Dewar

Lake Merced Task Force

Timeframe: 1999 (joined in November 2003) – present.

Hours: 20 hours

Participant References:

1) Tim Colen, Greater West Portal Neighborhood Association, 415.601.1709

2) Lisa Wayne, San Francisco Recreation and Parks Department, 415.753.7266

3) Mondy Lariz, California Trout, 408.356.8258

Tomales Bay Watershed Council

Timeframe: January 2000 (joined in January 2002) – present.

Hours: 120

Participant References:

1) Michael Mery, Community resident, 415.663.1623

2) Don Neubacher, Point Reyes National Seashore, 415.663.8522

3) Ed Ueber, Gulf of the Farallones National Marine Sanctuary, 415.561.4739

McCracken

Lower American River Task Force and Fisheries and Instream Habitat Working Group

Timeframe: July 2001 – present

Hours: Average of 20-25 hours per week

Participant References:

1) Peter Buck, Sacramento Area Flood Control Agency, Natural Resources Specialist, Tel: 916.874.4581

2) Sarah Foley, Water Forum, Program Manager, Tel: 916.264.1997

3) Rod Hall, (retired, formerly with) U.S. Bureau of Reclamation, Tel: 916.631.7643

4) Felix Smith, Save the American River Association, Tel: 916.966.2081

San Francisco Quails Recovery Plan

Timeframe: December 2002-March 2003

Hours: 20

Participant References:

- 1) Arthur Feinstein, Golden Gate Audubon Society, Tel: 510.843.6551
- 2) Nancy Wuerfel, SFSPCA/Cat Assistance Team, Telephone: 415.731.6432
- 3) Steve Cockrell, San Francisco Parks Coalition, Tel: 415.252.7473
- 4) Jared Blumenfeld, San Francisco Department of the Environment, Tel: 415.355.3701

Interagency Perchlorate Steering Committee

Timeframe: March 1998 – August 2000

Hours: 15-20 hours per week

Participant References:

- 1) Kevin Mayer, USEPA Region 9, Superfund Remedial Project Manager, Tel: 415.972.3176
- 2) Annie Jarabek, USEPA National Center for Environmental Assessment, Chemical Manager, Tel: 919.541.4847
- 3) Col. Dan Rogers, United States Air Force, Staff Judge Advocate, Tel: 501.987.7886

McInerny

Upper Klamath Basin Working Group

Timeframe: 1999-2001

Hours: 350

Participant References:

- 1) Teri Raml, Field Office Manager, Bureau of Land Management, Tel: 623.580.5500
- 2) Marshall Staunton, Farmer, Co-Chair of FACA Working Group, Tel: 541.892.5261
- 3) Mark Stern, Nature Conservancy, Co-Chair of FACA Working Group, Tel: 503.230.0707, ext. 333

Upper Guadalupe River Flood Protection Project EIS/EIR

Timeframe: 2002

Hours: 300

Participant References:

- 1) Alan Solbert, Principal, Jones & Stokes, Tel: 916.737.3000
- 2) Brandon Muncy, Sr. Project Manager, US Army Corps of Engineers, Tel: 916.557.6682
- 3) Richard Roos-Collins, Natural Heritage Institute, Tel: 510.644.2900 ext. 103

Guadalupe River Flood Control Project Collaborative

Timeframe: 1998-2000

Hours: 2,500

Participant References:

- 1) Alan Solbert, Principal, Jones & Stokes, Tel: 916.737.3000
- 2) Brandon Muncy, Sr. Project Manager, US Army Corps of Engineers, Tel: 916.557.6682
- 3) Richard Roos-Collins, Natural Heritage Institute, Tel: 510.644.2900 ext. 103

Santa Rosa and San Jacinto Mountains National Monument Federal Advisory Committee

Timeframe: 2002-2003

Hours: 200

Participant References:

- 1) Connell Dunning, Environmental Scientist, EPA (note: contact has been reassigned to EPA), Tel: 415.947.4161
- 2) Danella George, Monument Manager, Bureau of Land Management, Tel: 760.251.4800
- 3) Edward Kibbey, Advisory Committee Chairperson and Executive Director of the Building Industry Association of Southern California Inc., Desert Chapter, Tel: 760.360.2476

Winter Recreation Needs Assessment

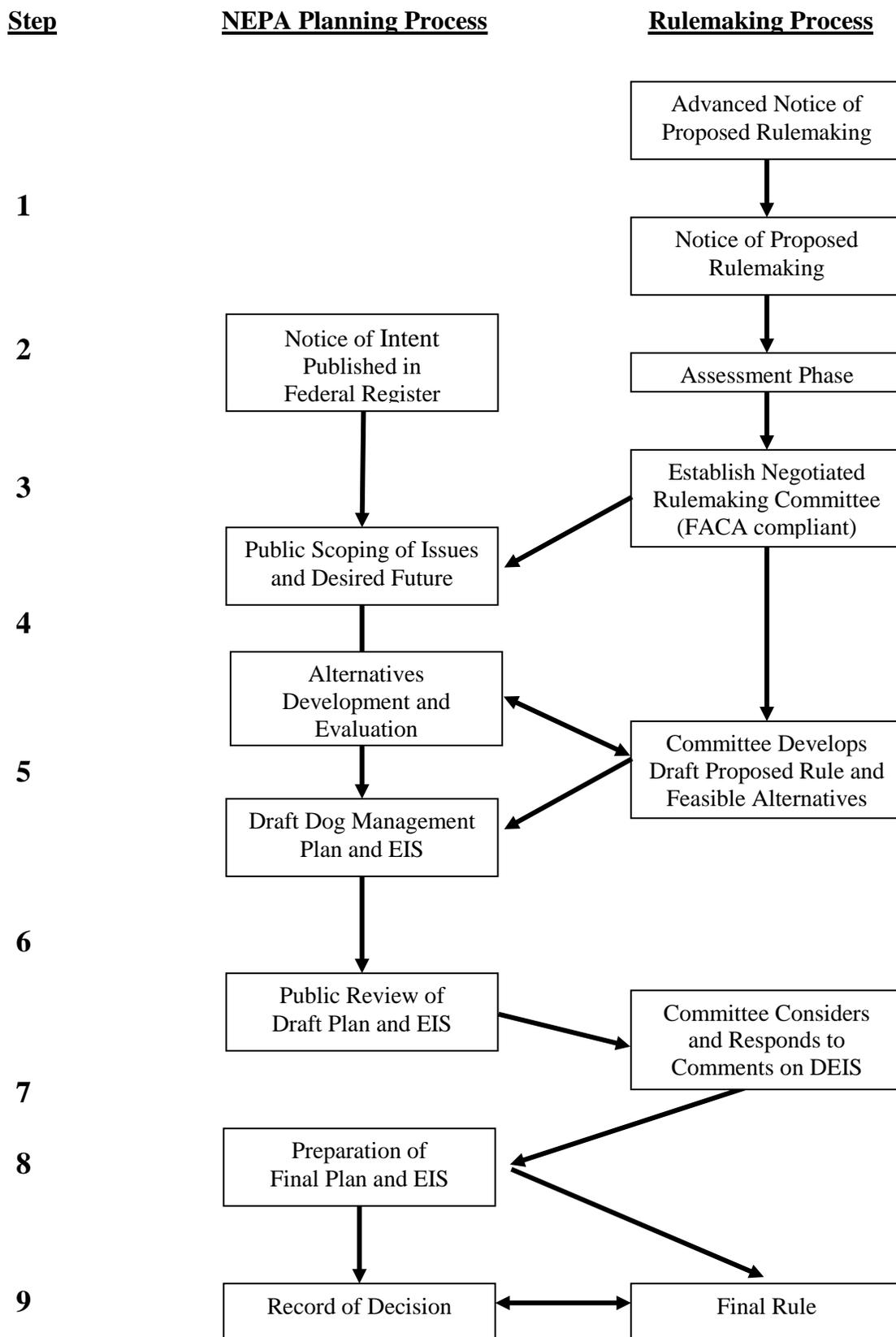
Timeframe: 2003 - ongoing

Hours: 250

Participant References:

- 1) Colleen O'Brien, Forest Recreation Planner, Inyo National Forest, Tel: 760.873.2490
- 2) Bill Sauser, President, Mammoth Lake Snowmobile Association, Tel: 760. 937.5822

Figure 1: Center for Collaborative Policy’s Proposed Integrated Planning Process
 (Note: length of arrows and space between boxes do not represent actual times between each step)



**SUGGESTIONS FROM THE PUBLIC REGARDING
NATURAL RESOURCES ANALYSIS IN THE GGNRA DOG PLAN/EIS
ADDITIONS AND REMOVAL OF LITERATURE**

Comment [EMB1]: Combine with other documents into one overarching doc
Also, include listing of DEIS studies showing if peer reviewed

GOGA Literature Suggested for Inclusion in Plan/EIS:

The following citations have been suggested for inclusion into the Plan/EIS through either individual comments in the PEPC database or through a hard copy of letters sent with comments to the draft Plan/EIS. The full citations that have been suggested are described, a summary of the article/paper/brochure has been prepared, a determination if the citation has been peer reviewed has been included, and the number of times the article/paper/brochure has been cited. Finally, a conclusion proposed by EA and next steps have been suggested for each citation.

1. Warren, Megan. 2007. *Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover*. Unpublished undergraduate thesis. UC Berkeley Environmental Sciences 196, Senior Research Seminar, May 7, 2007.

Peer Reviewed: NO

The study looked at disturbance of Western Snowy Plover (*Charadrius alexandrinus nivosus*) populations as a result of recreation disturbance. Disturbance was measured through observation surveys during February and March of 2007 at Crissy Field, Limantour Beach, and Abbott's Lagoon. Sites were classified by their level of recreation use, and the number of birds present, with a minimum population size for the samples of four birds. Disturbances were categorized into no response, and mild, moderate, or major response. Foraging activities were also recorded to determine the amount of time birds spent scanning for prey, actively foraging, and time spent alert. A linear regression was used to determine the relationship between frequency of disturbance and foraging, alert, and searching time. The linear regression indicated no relationship between disturbance level and alert time while feeding (p-values were $p=0.86$ for disturbance level and foraging time, $p=0.73$ for disturbance level and alert time, and $p=0.24$ for disturbance level and searching time). However the study size and time spent in the field observing were not sufficient, and her sites were not standardized (Crissy Field had no foraging). Discussion focused on other ways in which recreation may impact foraging behaviors of WSP, such as location of recreation, and removal of debris.

As stated during public comments to the draft Plan/EIS in the PEPC database: "Some of the most compelling research in the last few years has been by researchers such as Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impact."

Citations: This paper is not on Google Scholar, and the number of citations is unknown. It is available widely on the websites of San Francisco area dog-walking groups, personal blogs, and is noted in a book called *Unleashed Fury: The Political Struggle for Dog-friendly Parks* by Julie Walsh.

Papers on this topic that have been frequently cited include:

- Lafferty, KD. 2001. *Disturbance to wintering western snowy plovers* (cited 67 times)
- Lafferty, Goodman, and Sandoval. 2006. *Restoration of breeding by snowy plovers following protection from disturbance* (cited by 25)

These papers and others are cited in scientific journals

EAEST CONCLUSION: This paper has not been published because it was an undergraduate thesis, it has not been peer reviewed, and is not included on Google Scholar (citations in other papers is unlikely). Because of these reasons and due to the small study size and time spent in the field observing, and because the sites were not standardized, EA does not suggest including this literature into the Plan/EIS. In addition, EA has already incorporated and referenced the Lafferty 2001 citation mentioned above into the Plan/EIS.

NEXT STEP: None.

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2. California Department of Parks and Recreation. 2001. *Pilot Program for Unleashed Dog Areas*. December 17, 2001.

Peer Reviewed: Unknown

This report introduces a pilot program for off-leash dog walking in selected units of the State Park System, recognizing the need for off-leash dog parks in urban areas. Guidelines for off-leash dog parks were established, and a task group was formed to make recommendations and come up with two or three potential off-leash confined dog areas in state park units, which would undergo a pilot program to test the feasibility of off-leash dog walking. The report discusses issues of disagreement amongst the task group, and provides the sites chosen and the benefits and issues with these sites.

Citations: This paper is not available on Google Scholar, and the number of citations is unknown. It is available on the California Department of Parks and Recreation website. Similar papers include other pilot program reviews, and the following:

- Foster, LK. 2006. *Dogs on the Beach: A Review of Regulations and Issues Affecting Dog Beaches in California* (cited 2 times)

This paper was produced for the California Research Bureau, as requested by Assemblymember Ted W. Lieu.

EAEST CONCLUSION: This paper has not been published, it has likely not been peer reviewed, and has not been cited. EA does not suggest using this study for the Plan/EIS.

NEXT STEP: None.

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3. Ewing, John. 1999. *Managing Off-leash Recreation in Urban Parks*. February 27, 1999.

Peer Reviewed: NO

Summary written for SFDOG about the benefits of dog ownership and off-leash recreation, particularly in regards to San Francisco. Paper lays out the position of SFDOG in support of off-leash dog walking, and includes suggestions for elements necessary to create a successful off-leash area. Paper includes no citations.

Citations: This paper is not available on Google Scholar, and the number of citations is unknown.

EAEST CONCLUSION: This paper has not been published, it has not been peer reviewed, and has not been cited. EA does not suggest using this study for the Plan/EIS.

NEXT STEP: None.

Comment [EMB2]: If not peer reviewed but otherwise seems strong, AND there is no other study that could take its place, let's consider using it, with disclosure that those studies not peer reviewed are kept in for X, Y, Z reasons

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4. Robinson-Nilsen, Caitlin, Demers, Jill Bluso, and Cheryl Strong. 2010. *Western Snowy Plover Numbers, Nesting Success, Fledgling Success and Avian Predator Surveys in the San Francisco Bay, 2010*. SFBBO and USFWS. December 30, 2010.

Peer Reviewed: Unknown

The study looked at the nesting success of Western Snowy Plovers and sought to contribute to the management of the population of WSP of the San Francisco Bay. The study recorded numbers of WSP, site use, nest success, fledging success, use of habitat enhancement project sites. The species and numbers of nest and avian predators in the breeding season were also recorded. Counts for adult plovers in the 2010 breeding season were 275 individuals. Of 245 nests in the South Bay, 100 hatched, 133 were depredated, six were abandoned, two were flooded, one was lost at hatch and one had an unknown nest fate. WSP chicks were banded in order to study their movements and to estimate fledging success, which ranged from 0-100%, dependent on the pond, though the average fledging rate was 41 percent. Lastly, the study indicated that California Gulls are a predator of concern, among other predatory species.

Citations: This paper is available on Google Scholar, and has no citations. A report on the Snowy plovers similar to this report appears to be produced yearly. Other similar papers include:

- Colwell et al. 2005. *Snowy Plover reproductive success in beach and river habitats* (cited 22 times)
- Stenzel et al. 2007. *Survival and natal dispersal of juvenile Snowy plovers (Charadrius alexandrinus) in central coastal California* (cited 17 times)

These papers are from scientific journals.

EAEST CONCLUSION: Suggest incorporating some general statements from this report into the Literature Review section of Chapter 4 describing impacts to Western snowy plovers.

NEXT STEP: EA will read and review entire article and incorporate results into the Literature Review section of Chapter 4.

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5. NPS. 2006. *Protecting the Snowy Plover*. October.

Peer Reviewed: Unknown

An informational handout produced by NPS about the Western Snowy Plover and its presence in GOGA. Handout provides description of the species, threats to WSPs, and ways to protect breeding and nesting WSPs at GOGA. Handout also includes a map of the Crissy Field wildlife protection area (WPA), and the Ocean Beach plover protection area.

Citation: There are no citations for this paper on Google Scholar. The paper is not available on Google Scholar but is available on the internet elsewhere. Similar documents are unknown.

EAEST CONCLUSION: Comment noted; it is unclear what additional information from this general handout describing the Western snowy plover could be added to the Plan/EIS.

NEXT STEP: None.

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6. USFWS. 2006. *San Francisco Garter Snake (Thamnophis sirtalis tetrataenia) 5-Year Review: Summary and Evaluation*. Sacramento Field Office, Sacramento, California. September.

Peer Reviewed: Unknown

Paper provides a scientific review of the San Francisco garter snake (SFGS) recovery plan. Review was completed by USFWS staff using surveys, peer-reviewed journal articles, and documents from Section 7 Consultation as part of the review. Review outlines areas of habitat, and a detailed review of the status of populations of the San Francisco garter snake at specific known sites. There are also detailed reviews of the genetics of the regional populations. A Five-factor analysis (based on threats, conservation measures, and regulatory mechanisms) within the document looks at the present or impending destruction of habitat at several sites with known occurrences of the SFGS. Other threats, like illegal collection, disease, predation, and the inadequacy of the existing regulatory mechanisms are also discussed. Lastly, the review provides the recommendation that no change is needed in the status of the SFGS, though the report re-classifies the species with a new recovery priority number. Suggested future actions include the development of an updated recovery plan, actions to encourage conservation among private landowners, habitat restoration and enhancement initiatives, the creation of captive holding facilities, increased demographic research, and increased law enforcement.

Citations: There are no citations for this paper on Google Scholar. The paper is not available on Google Scholar but is available online elsewhere. Similar documents are unknown.

EAEST CONCLUSION: EA has reviewed this document and will add the threats to SF Garter Snake (from Armita Bowman, correspondence # 4640 and #4650, who is concerned that there is no evidence dogs impact the SF garter snake), which include: 1) loss of open spaces to construction, 2) loss of grasslands (due to stopping grazing and fire suppression that allows for denser vegetation growth), and 3) illegal specimen collection.

NEXT STEP: Add statements regarding threats to the SF garter snake as specified above to Plan/EIS.

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7. Fancy, SG, Gross, JE, and SL Carter. 2009. *Monitoring the Condition of Natural Resources in US National Parks*. Environmental Monitoring and Assessment: Vol. 151, pp 161-174.

Peer Reviewed: YES

The paper discusses the ecological monitoring program in 32 ecoregional networks under NPS Vital Signs Monitoring. This network includes 270 parks with significant natural resources. Monitoring allows NPS to develop sound information on the status of these resources, and to provide information on the success of current resource management practices. Having this network allows managers and decision-makers to gather broad-based resource trends when making decisions. Monitoring data are taken from a variety of sources, and synthesized into formats that target key audiences, such as the general public, congress, and park planners. The paper discusses the factors involved in setting up such a network, determining indicators and the priority of factors. Lastly, the paper explores challenges and future steps for the monitoring program.

Citation: This paper is cited 35 times on Google Scholar. Papers that cite this paper and papers that are similar to this paper include:

- Bestelmeyer et al. 2009. *State-and-Transition Models for Heterogeneous Landscapes: A Strategy for Development and Application* (cited 40 times)
- Laundres, Morgan, and Swanson. 1999. *Overview of the use of natural variability concepts in managing ecological systems* (cited 610 times)
- Jones et al. 2009. *Monitoring land use and cover around parks: A conceptual approach* (cited 14 times)

These papers are from peer reviewed journals.

EAEST CONCLUSION: EA will forward this document to NPS, as it suggests the GGNRA is not monitoring their Recreation Areas, specifically in San Mateo County (from Arnita Bowman, correspondence # 4640, #4650, and # 4667)

NEXT STEP: EA suggests that NPS prepare a response to these comments regarding monitoring at GGNRA.

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8. Pets Are Wonderful Support (PAWS). 2007. *The Health Benefits of Companion Animals*. Brochure produced for PAWS.

Peer Reviewed: NO

This is an informational brochure on the benefits of the human-animal bond on healthy and sick individuals, with information of the detrimental impacts of removing pets from those who are terminally ill. Brochure provides direction for health professionals on maintaining the relationship of terminally ill patients with their pets. The brochure details the physiological benefits of the human-animal relationship and provides examples of health benefits related to pet interactions. Brochure notes that dog ownership can decrease risk factors for cardiovascular disease, and decreased physiological stress, among many other benefits, including benefits of increased social interaction.

Citation: This paper is not cited or available on Google Scholar. Similar articles include:

- Beck and Meyers. 1996. *Health enhancement and companion animal ownership* (cited 99 times)
- Garrity et al. 1989. *Pet Ownership and Attachment as Supportive Factors in the Health of the Elderly* (cited 76 times)

These papers are from peer reviewed journals.

EAEST CONCLUSION: This paper has not been published because it was a brochure, it has not been peer reviewed, and has not been cited. EA suggests using other articles (as presented above) instead to describe the health benefits of [dogwalking](#).

NEXT STEP: Obtain Beck and Myers 1996 and Garrity et al. 1989 article. Summarize articles and determine applicability for inclusion into Plan/EIS.

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9. Villabli, JR, Cleries, M, Bouis, S, Peracho V, Duran, J, and C. Casas. 2010. *Decline in hospitalisations due to dog bite injuries in Catalonia, 1007-2007. An effect of government regulation?* Injury Prevention, Vol. 16, pp. 408-410.

Peer Reviewed: YES

This study analyzed dog bites from population data collected before and after a change in legal regulations on dog ownership. These regulations included breed-specific measures. Data was collected from people hospitalized with injuries resulting from dog bites during 1997-2008. Data indicated a significant decline in hospitalizations due to dog bites after the enactment of strict [curfew](#) regulations in 1999 and 2002. These regulations were associated with a decline in dog bites within the population.

Citations: This paper cannot be found on Google Scholar, and has no citations. It is available on the PubMed database. Related citations include the following articles on PubMed:

- Hoff et al. 2005. *Emergency department visits and hospitalizations resulting from dog bites, Kansas City, MO, 1998-2002.*

- Bernardo et al. 2002. *A comparison of dog bite injuries in younger and older children treated in a pediatric emergency department.*

These articles come from peer reviewed health journals.

EAEST CONCLUSION: Although these data are presented in a peer reviewed document, it has no citations and EA suggests using the CDC data instead to describe trends of dog bites as well as the U.S. Department of Health and Human Services report regarding dog bites (as suggested in correspondence #4278)

NEXT STEP: None.

Comment [EMB3]: What's nice about this paper though is that it suggests that regulations can make a difference, which could help bolster the health and safety analysis

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10. Unshelm, J, Rehm, N, and E Heidenberger. 1993. *The Problem of the danger of dogs; a study of incidents with dogs in a large city.* Dtsch Tierarztl Wochenschr, Vol. 100, No. 10, pp 383-389. October 1993. Published in German.

Peer Reviewed: Unknown (possibly)

This study examined incidents with dogs in Munich from 1986-1991, and analyzed data based on sex of victim, dog, influence of the breed, age of the dog and victim, behavior of the owner, and location of the incident. The results indicated that certain breeds were more likely to be involved in bite incidents, and that the influence of the dog owner was very important in determining the seriousness and frequency of incidents. Additionally, results indicated that almost 90 percent of dogs had been off-leash, and while most events occurred in public places, only 9 percent occurred in parks.

Citation: Citations: This paper cannot be found on Google Scholar, and has no citations. It is available on the PubMed database. Related citations include the following articles on PubMed:

- O'Sullivan et al. 2008. *Characteristics of 234 dog bite incidents in Ireland during 2004 and 2005.*
- Shuler et al. 2008. *Canine and human factors related to dog bite injuries.*

These articles came from peer reviewed and non-peer reviewed journals on veterinary medicine.

EAEST CONCLUSION: This article is not peer reviewed and has no citations. EA suggests using the CDC data instead to describe trends of dog bites as well as the U.S. Department of Health and Human Services report regarding dog bites (as suggested in correspondence #4278).

NEXT STEP: None.

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11. Beck, Alan, ScD, Loring, Honey, and Randall Lockwood. 1975. *The Ecology of Dog Bite Injury in St. Louis, Missouri.* Public Health Reports: May-June 1975, Vol. 90, No. 3.

Peer Reviewed: YES

This study was concerned with the situation present during a dog bite—as the paper says, “an analysis of the activity of the victim and the animal in the specific environmental context of the bite incident, that is, the ecology of dog bite injury”. Data from St. Louis was used, where reports of dog bite incidents require a narrative detailed description of the bite event and thus include extensive data on the circumstances of the incident. The results indicated that bite rates were increasing, particularly among children. Of the victims, 67.3 percent did not interact with the owner. Paper discussed that while society may view a dog bite as being the fault of the victim, this idea may need to be re-evaluated.

Citations: This paper has been cited 91 times on Google Scholar. Similar papers include:

- Weiss, Friedman, and Coben. 1998. *Incidence of dog bite injuries treated in emergency departments* (cited 205 times)
- Overall and Love. 2001. *Dog bites to humans- demography, epidemiology, injury, and risk* (cited 81 times)

These articles came from peer-reviewed veterinary journals.

EAEST CONCLUSION: Although these data are presented in a Public Health Report which has been cited numerous times, EA suggests using the CDC data instead to describe trends of dog bites and U.S. Department of Health and Human Services report regarding dog bites (as suggested in correspondence #4278), as described in more detail below

NEXT STEP: None.

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12. Centers for Disease Control and Prevention. 2011. *WISQARS (Web-based Injury Statistics Query and Reporting System)*. February 24, 2011. Available [online]: <http://www.cdc.gov/injury/wisqars/index.html>. Accessed June 14, 2011.

Peer Reviewed: N/A

This is the CDC's database of all fatal and non-fatal injuries in a nationwide system. Data also includes violent death data, and the cost of injuries. This data can be used to learn about public health and economic burdens of injuries. This data can be searched and sorted to find out information about dog bites and attacks, among other injuries.

<http://www.cdc.gov/HomeandRecreationalSafety/Dog-Bites/biteprevention.html>

Park users have legitimate concerns about their safety around dogs, especially off-leash dogs. According to the CDC, approximately 4.5 million people are bitten by dogs each year, with approximately one-fifth of those (or 885,000) requiring medical attention for dog-related injuries.

Citations: N/A

EAEST CONCLUSION: This reference was suggested for inclusion by Golden Gate Audubon Society in their comments to the Draft Plan/EIS letter dated 31 May 2011 as well as in numerous public comments in the PEPC database. A generalized statement regarding the number of dog bites and cost of injuries can be included in the Plan/EIS from the CDC website, as suggested for incorporation into by Golden Gate Audubon Society

NEXT STEP: Obtain data from website, add some general statements to Plan/EIS and add CDC to References Section; may also want to consider adding data from the U.S. Department of Health and Human Services regarding dog bites (as suggested in correspondence #4278).

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13. Public Health Agency of Canada. 1999. *Injuries associated with...Dog bites and dog attacks*. Canadian Hospital Injury Reporting and Prevention Program (CHIRPP). November 11, 1999. Available [online]: <http://www.phac-aspc.gc.ca/injury-bles/chirpp/injrep/rapbles/dogbit-eng.php>. Accessed June 14, 2011.

Peer Reviewed: N/A

Comment [EMB4]: The CDC data looks at different factors than this study though. This looks at the specific context of the bite, whereas the CDC data doesn't evaluate in that context. This could be useful info – esp part that shows children are most at risk. I suggest keeping this one for health and safety

Comment [SES5]: And it notes a potentially changing viewpoint as to where the fault lies. Also notes that most victims do not interact with owner – does that speak to level of owner control of and responsibility for the dog?

CHIRPP is the database of injury reporting and prevention for Canada. This is a computerized information system that collects data on injuries that are seen at emergency rooms of 14 hospitals in Canada. Most of these involve children, as 10 of these hospitals are pediatric hospitals. These injuries do not represent all injuries, only those seen in emergency room facilities.

Citations: N/A

EAEST CONCLUSION: Instead of incorporating Canadian information regarding dog bites and injuries, EA suggests using data from the CDC website as suggested above.

NEXT STEP: None.

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14. City and County of San Francisco. n.d. *Guidelines for Dog Walkers*. Animal Care and Control. Available [online]: <http://www.sfgov2.org/index.aspx?page=1083>. Accessed June 21, 2011.

Peer Reviewed: N/A

[These are the guidelines for dog walkers in the city and county of San Francisco. Guidelines are signed by professional dog walkers, who are then listed on the website as having agreed to the proposed restrictions. These include regulations about the number of dogs each walker should have, license and vaccination requirements, cleaning up feces, leash use in on-leash areas, and vehicle transport. Services will be removed if complaints on companies are received. The website also includes information on city and county codes relating to dogs. There are codes regarding dog licensing, duties of owners, vaccination requirements, and about controlling dogs.]

Citations: N/A

EAEST CONCLUSION: Comment noted; it is unclear what additional information from these guidelines could be added to the Plan/EIS. These suggestions have already been incorporated into PEPC under the concern statement titled: "Suggest New Alternative Elements"

NEXT STEP: None.

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15. Murphy, Dan. 1996. *San Francisco Peninsula Birdwatching: Ocean Beach and Fort Funston*. Sequoia Audubon Society.

Peer Reviewed: Unknown (unlikely)

This is an informational article on bird watching at Fort Funston and Ocean Beach. The document contains detailed descriptions of habitat available at these sites, and where the best areas to find birds at specific times of year would be. The article lists likely bird species at certain areas, as well as less common species. The report also includes the yearly report of abundance for Ocean Beach from July 1, 2010 to June 30, 2011 from ebird.org.

Citations: This paper is not available on Google Scholar, and citations are unknown.

EAEST CONCLUSION: In general, this paper is informative regarding the bird species present at Fort Funston and Ocean Beach, but is not peer reviewed, not cited, and does not provide any information on dog disturbance to these birds. EA does not suggest using this information in the Plan/EIS.

NEXT STEP: None.

Comment [SES6]: This is why permits must be issued in person, so all guidelines can be explained to and agreed to by dog walker. Also another reason why GOGA shouldn't just accept other agency's (SF) permits

16. North American Bird Conservation Initiative, U.S. Committee. 2011. *The State of the Birds: 2011 Report on Public Lands and Waters*. U.S. Department of Interior: Washington, DC. 48 pages.

Peer Reviewed: Yes

Each year, the *State of the Birds* report provides important scientific data to a broad audience with a call to action to improve the conservation status of birds and the environment. The 2011 report brings attention to the tremendous promise of public lands and waters for conserving America's wildlife and habitats.

"Major threats to coastal birds include habitat loss and degradation, human disturbance, and predators. Public recreation, development interests, and wildlife compete for beaches. Public ownership of beaches varies among states. In most states, all land below the mean high tide line belongs to the state, and citizens have the right to unrestricted access. Primary threats to birds on beaches include human-caused disturbance, increased predators, sea-level rise, and habitat loss. Many states allow off-road vehicles (ORVs) or **unrestricted public access with pets such as dogs** and cats. ORVs can be highly disturbing to nesting or feeding shorebirds."

Citations: None - recently published; suggested for incorporation into EIS by Marin Audubon Society

EAEST CONCLUSION: This reference was suggested for inclusion by Marin Audubon Society in their comments to the Draft Plan/EIS letter dated 27 May 2011. Of the 48 pages in this report, there is only one statement regarding dogs and this sentence neither relates dogs to disturbance of birds nor explicitly states dogs as a threat to birds. EA suggests not including this report in Reference Section of Plan/EIS.

NEXT STEP: None.

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17. Grinnell, Joseph. 1932. "Type localities of birds described from California." *University of California Publications in Zoology*, Vol. 38, No. 3:243-324.

There are records of snowy plover bird and egg specimens collected during nesting season within GGNRA [Crissy Field]. Also, the Western Snowy Plover is culturally significant in that the type specimen (the individual specimen used as a basis for determining the characteristics for the species) was collected in the Presidio of San Francisco by Lt. William P. Trowbridge on May 8, 1854 (Grinnell, 1932 as cited in Zlatunich 2008 – see below).

Citations: Article has been cited 9 times; suggested for incorporation into EIS by Golden Gate Audubon Society

EAEST CONCLUSION: This reference was suggested for inclusion by Golden Gate Audubon Society in their comments to the Draft Plan/EIS letter dated 31 May 2011. Information regarding historical nesting of the Western snowy plover at Crissy Field and cultural significance of this bird at this site can be added to the Plan/EIS.

NEXT STEP: EA needs to obtain a copy of this article, as it was not found through JSTOR, likely due to the 1932 publication date

Comment [EMB7]: Contact the commenter that noted the article. If it can't be found, I'm wondering if we still can't cite to it for the general proposition that snowy plovers did inhabit CF from a historical context

18. Zlatunich, Matthew. 2008. *Western Snowy Plover Monitoring at the Crissy Field Wildlife Protection Area of the Presidio of San Francisco and the Effectiveness of the Seasonal Use Restriction 2007/2008*. Golden Gate Audubon, San Francisco, California.

Peer Reviewed: Unknown

The report contains the results of 38 surveys of Western snowy plovers from August 2007 through April 2008 at the Crissy Field WPA. Surveys were conducted for one hour from an observation platform, and included monitoring all wildlife species observed. The Cosco Busan oil spill in 2007 resulted in the increase of monitoring of WSP at Crissy Field and Ocean beach, which were impacted, resulting in a subsequent clean-up effort being carried out at the site. There were at a minimum six WSP in the WPA throughout the wintering season. Disturbances were recorded, and off-leash dogs were shown to have a 23 percent disturbance rate of WSP, while the rate for on-leash dogs was only 2 percent. The study indicated that education and enforcement have been effective in reducing the presence of dogs at the site, but are not adequate to bring park users in compliance with seasonal restrictions. Study provided recommendations for managing WSP at GOGA.

Comment [EMBB]: Contact commenter to see if they know if it was peer reviewed Same for all like this if possible

The Western Snowy Plover is culturally significant in that the type specimen (the individual specimen used as a basis for determining the characteristics for the species) was collected in the Presidio of San Francisco by Lt. William P. Trowbridge on May 8, 1854 (Grinnell, 1932 as cited in Zlatunich 2008).

Citations: Article is available online, but is not available on Google Scholar; this document referenced the Grinnell 1932 citation.

EAEST CONCLUSION: This document was not suggested for inclusion, but S. Koser searched and found this document and added to literature review. The results of this document will be reviewed and added to Plan/EIS since this document has been obtained.

NEXT STEP: Review document and update Plan/EIS; add citation to References Section.

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19. Zlatunich, Matthew and Lynes, Michael. 2010. *Western Snowy Plover Monitoring at the Crissy Field Wildlife Protection Area of the Presidio of San Francisco 2009/2010*. Golden Gate Audubon, San Francisco, California.

Peer Reviewed: Unknown

In 2009-2010, Golden Gate Audubon volunteers continued monitoring wintering western snowy plovers at the Crissy Field Wildlife Protection Area in the Presidio, San Francisco CA. Data collected indicate that the number of plovers using the WPA continues to decline from 4.11 plovers observed per survey hour in 2005-2006 to 1.55 plovers per survey hour in 2009-2010. Compliance with the dog leash requirements remains approximately 34%, unchanged from 2008-2009, meaning that approximately 2/3 of dog owners visiting the area are failing to comply with the requirement to leash their dogs. Protection of the plovers would be enhanced by increased outreach and education, enforcement of leash requirements, and other measures to decrease disturbances of the plovers and other wildlife that rely on the WPA.

Citations: Document is available on Google Scholar but has not been cited.

EAEST CONCLUSION: This document was not suggested for inclusion, but S. Koser searched and found this document and added to literature review. The results of this document will be reviewed and added to Plan/EIS since this document has been obtained.

NEXT STEP: Review document and update Plan/EIS; add citation to References Section.

20. Pomerantz, G. A., Decker, D.J., Goff, G.R., & Purdy, K. G. (1988). *Assessing impact of recreation and wildlife: a classification scheme*. Wildlife Society Bulletin, 16, 58-62.

Peer Reviewed: Unknown

Meeting public demand for wildlife recreation opportunities while avoiding undesirable impacts on wildlife and its habitat is a constant challenge for wildlife managers. The authors developed a classification of impacts that recreational activities can have on wildlife which can be used as framework for making decisions regarding the permissibility of various recreational uses of wild lands. Negative impacts were classified into the following six categories: 1) Direct mortality, 2) Indirect mortality, 3) Lowered productivity, 4) Reduced use of refuge, 5) Reduced use of preferred habitat, 6) Aberrant behavior or stress.

Citations: Article has been cited on Google Scholar 42 times; suggested for use in impacts analysis by Charles Pfister.

EAEST CONCLUSION: Suggest possibly incorporating an adapted version of the proposed impact categories into the impacts analysis.

NEXT STEP: EA will provide electronic version of this article to NPS via email; further discussion with NPS will be required in order to incorporate into Plan/EIS because wildlife thresholds presented in the Plan/EIS would be affected/changed.

Comment [EMB9]: We shouldn't change thresholds at this point

21. Davidson, N. C., and P. I. Rothwell. 1993. *Human disturbance to waterfowl on estuaries: conservation and coastal management implications of current knowledge*. Wader Study Group Bull. 68:97-105.

Peer Reviewed: YES

The article explores the impact of recreational disturbance on waterfowl species, and the ways to assess this disturbance. The article looks at the patterns of recreation and how these patterns translate to disturbance, for example areas on a beach where people are recreating. Factors that must be accounted for include the "buffering capability" that birds have to deal with disturbance before they face a reduced energy balance, and the necessity of distinguishing between impacts to individuals and effects on a whole population of waterfowl. There are difficulties in assessing this, particularly with migratory populations, for which effects of disturbance may not be manifested at the area where the effects occurred. The authors have chosen certain circumstances for which disturbance is most likely to be high regardless of other factors such as during certain times of year, in certain kinds of weather, and depending on what kind of disturbance is occurring. The article notes that dogs and moving people have a larger effect on birds than visitors who remain in one place for a long period of time. The authors conclude by suggesting management techniques to lessen disturbance of recreation on waterfowl species.

Citations: This article cannot be found on Google Scholar, and has no citations. Similar articles included:

- Madsen. 1995. *Impacts of disturbance on migratory wildlife* (cited by 136)

- Verhulst et al. 2001. *Experimental Evidence for effects of human disturbance on foraging and parental care in oystercatchers* (cited by 66)
- Blanc et al. 2006. *Effects on non-consumptive leisure disturbance to wildlife* (cited by 14)

EAEST CONCLUSION: Suggest incorporating some general statements in this article (from Charles Pfister) into the Literature Review section of Chapter 4 describing impacts to wildlife.

NEXT STEP: EA will read and review entire article and incorporate results into the Literature Review section of Chapter 4.

22. Gill, J.A., Norris, K., and W.J. Sutherland. 2001. *Why behavioral responses may not reflect the population consequences of human disturbance*. *Biological Conservation* 97:265-268.

Peer Reviewed: YES

The paper is an investigation into the validity of the idea that the level of response by a species is indicative of the accessibility of a species and the need to protect the species. A common idea in previous literature is that the more a species avoids human disturbance, the more the species requires protection. Alternately, species that do not strongly avoid human disturbance are believed to need less protection. The authors challenge this idea by indicating why the level of disturbance avoidance may not accurately indicate the vulnerability of a species, and need for conservation because the costs of disturbance must be weighed against the nearby available habitat. The cost of moving in response to disturbance is greater if available habitat is not as plentiful, and as such species with no available habitat must remain despite the level of disturbance. The authors make the point that future studies should address how behavioral changes in response to disturbance impact factors like survival and reproductive success. They also stress that studies must take into account the strength of density-dependence within a system in order to determine whether changes in survival or fecundity will have any impact on overall population size.

Citations: This article has been cited on Google Scholar 238 times. Similar articles include:

- Frid and Dill. 2002. *Human-caused disturbance Stimuli as a Form of Predation Risk* (cited 363 times)
- Beale and Monahan. 2004. *Behavioural responses to human disturbance: a matter of choice?* (cited 100 times)
- Fernández-Juricic et al. 2002. *Alert distance as an alternative measure of bird tolerance to human disturbance: implications for park design* (cited 76 times)

These articles are from scientific journals.

EAEST CONCLUSION: Suggest incorporating the results in this article (from Charles Pfister) into the impacts analysis of Chapter 4 for the Plan/EIS.

NEXT STEP: EA will read and review entire article and incorporate the results into the Plan/EIS.

23. Keller, VE. 1991. *Effects of human disturbance on eider ducklings *Somateria mollissima* in an estuarine habitat in Scotland*. *Biological Conservation* 58: 213-228.

Peer Reviewed: YES

Eider ducklings *Somateria mollissima* on the Ythan estuary in Scotland were frequently disturbed by recreational activities, both when roosting on the shore and when feeding in the water. Shore-based activities (fishermen, people walking along the shore, dogs) caused more disturbances than water-based

ones (windsurfers, rowing boats). Disturbance affected the activity of eider creches for up to 35 min. Disturbance of small ducklings led to an increase in predator encounters during the five minutes following the disturbance.

Citations: This paper has been cited on Google Scholar 28 times. Similar articles include:

- Ounstead et al. (1992) *Examination of the effects of disturbance on birds with reference to its importance in ecological assessments* (Cited 110 times)
- Lord et al. (1997) *Effects of human activity on the behaviour of northern New Zealand dotterel *Charadrius obscurus aquilonius* chicks* (Cited by 43)
- Mikola et al. (1994) *The effects of disturbance caused by boating on survival and behaviour of velvet scoter *Melanitta fusca* ducklings*

Articles are generally in biological and environmental management scientific journals

EAEST CONCLUSION: Because the authors only studied disturbance (not explicitly from dogs) of one duck species in Scotland, it would be challenging to extrapolate to impacts at GGNRA and thus it is not suggested that this article be included in discussion for Plan/EIS.

NEXT STEP: None.

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24. Kersten, M. and T. Piersma. 1987. *High levels of energy expenditures in shorebirds: metabolic adaptations to an energetically expensive way of life*. *Ardea* 75: 175-187.

Peer Reviewed: YES

The authors completed a study to look at the relationship of daily energy expenditure (DEE) and basal metabolic rate (BMR) in three species of shorebirds. Free birds were caught and kept in cages for the duration of the three year study. They were fed commercial food pellets, and daily weight change and oxygen consumption were measured. The relationship between metabolic rate and air temperature was also studied. The cost of adding body fat was calculated, and it was determined that for birds to add a gram of fat they require 1.3-2.6 grams of additional food consumption. The birds were found to have a BMR that was higher than expected for their average weights. This shows that energy expenditure and DEE for shorebirds is relatively high, and that the cost of thermoregulation in these species is also high. Hence, both at rest, and under restrained and unrestrained conditions, shorebirds utilize more energy than other non-passerine birds of their size, but the ratios between active and rest metabolism are almost identical to those in other bird species.

Citations: The article has been cited 247 times on Google Scholar. Other similar articles include:

- Daan et al. 1990. *Avian basal metabolic rates: their association with body composition and energy expenditure in nature* (Cited 289 times)
- Piersma et al. 1996. *Variability in basal metabolic rate of a long-distance migrant shorebird (red knot, *Calidris canutus*) reflects shifts in organ sizes* (Cited 129 times)

Articles cited are found in physiology journals

EAEST CONCLUSION: Suggest incorporating the results in this article (from Charles Pfister) into the impacts analysis of Chapter 4 for the Plan/EIS.

NEXT STEP: EA will read and review entire article and incorporate the results into the Plan/EIS.

25. Kirby, J. S., C. Clee, and V. Seager. 1993. *Impact and extent of recreational disturbance to wader roosts on the Dee Estuary: some preliminary results*. Wader Study Group Bull. 68:53-58.

Peer Reviewed: YES

This paper outlines the results of data collected by volunteers who patrolled Kirby Beach during wader roosting to try to limit disturbances to roosting birds. These volunteer wardens patrolled the beach during high tides, and stopped visitors who were about to disturb the roosting birds. They would talk to visitors, provide them with educational material, and record data on disturbances. They recorded the number of potential disturbances, details of any disturbances, and the number of wading birds that were trying to feed or roost at the time of disturbance. The response of the birds to disturbance was also recorded. The most common disturbance recorded was from walkers and dogs, with dogs accounting for 26-41 percent of potential disturbances, and 27-72 percent of actual disturbances. The most common response of birds to disturbances by dogs was to take flight and soon return to the area.

Citations: This article has been cited 27 times on Google Scholar. Similar articles include:

- Gill et al. 2001. *The effects of disturbance on habitat use by black-tailed godwits *Limosa limosa** (cited 59 times)
- Burton et al. 1996. *Effects on shorebird numbers of disturbance, the loss of a roost site and its replacement by an artificial island at Hartlepool, Cleveland* (cited 33 times)

Articles are from scientific journals.

EAEST CONCLUSION: Although this study took place in Wales, it has been peer reviewed, cited numerous times, and includes a discussion of disturbance to birds from dogs. Because of this, EA suggests incorporating the results in this article (from Charles Pfister) into the impacts analysis of Chapter 4 for the Plan/EIS.

NEXT STEP: EA will read and review entire article and incorporate the results into the Literature Review section of Chapter 4.

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26. Lenth, B.E., Knight, R.L., and M.E. Brennan. 2008. *The Effects of dogs on wildlife communities*. Natural Areas Journal 28(3):218-227.

Peer Reviewed: YES

The effects of dogs on wildlife were studied by comparing the activity levels of wildlife in areas where dogs were allowed, and areas where they were prohibited. Wildlife activity was measured using five methods: (1) pellet plots, (2) track plates, (3) remote triggered cameras, (4) on-trail scat surveys, and (5) mapping prairie dog (*Cynomys ludovicianus*) burrow locations. The presence of dogs along trails was correlated to altered habitat usage by wildlife. Use of areas where dogs were allowed was significantly lower than use in areas where dogs were prohibited. These findings have implications for the management of natural areas, particularly those that allow dogs to be off-leash.

Citations: Article has been cited 14 times on Google Scholar. Similar articles include:

- Taylor and Knight. 2003. *Wildlife Responses To Recreation And Associated Visitor Perceptions* (cited 111 times)
- Banks and Bryant. 2007. *Four-legged friend or foe? Dog walking displaces native birds from natural areas* (cited 23 times)

These articles are from scientific journals

EAEST CONCLUSION: This article has already been used in and cited in the Plan/EIS as has the Banks and Bryant (2007) article; the Taylor and Knight (2003) article did not attempt to address differences in wildlife response as a result of difference recreational activities such as dogwalking so this article was not included in the Plan/EIS.

NEXT STEP: None.

27. Pfister, C., Harrington, B.A., and Lavine, M. 1992. *The impact of human disturbance on shorebirds at a migration staging area*. *Biological Conservation* 60: 115-126.

Peer Reviewed: YES

The effects of human disturbance on the capacity of a migratory bird staging area were studied. Long-term census data was analyzed, and results indicated that in four of seven migratory bird species, birds showed one or more types of movement in response to disturbance. At areas of high human disturbance, the abundance of migratory bird species may be reduced up to 50 percent. Disturbance is implicated as a potential factor in long-term declines in shorebird abundance at the site, and may be limited or reduced by closing parts of the beach during migration.

Citation: This article has been cited 103 times on Google Scholar. Similar articles include:

- Gill et al. 1996. *A method to quantify the effects of human disturbance on animal populations* (cited 191 times)
- Burger. 1998. *The effect of human activity on birds at a coastal bay* (cited 171 times)

These articles are in biological journals

EAEST CONCLUSION: Suggest incorporating the results in this article (from Charles Pfister) into the impacts analysis of Chapter 4 for the Plan/EIS.

NEXT STEP: EA will read and review entire article and incorporate the results into the Plan/EIS.

28. Scott, F. E. 1989. *Human disturbance of wading birds on the Ythan estuary*. Unpubl. B.Sc. thesis, Department of Zoology, Univ. Aberdeen. 42 pp. [abstract in Wader Study Group Bull. 68:81-82]

Peer Reviewed: Unknown (unlikely)

The disturbance to waders from walkers, bait-diggers, and sport fishermen was studied. Dog walkers were found to be the most common cause of disturbance, and more than half of the walkers were accompanied by dogs. The study showed the reactions of different species to these different recreational activities. The time it took for birds to return to an area after disturbance was studied, and most species kept considerably far distances from disturbance by fishermen, though these distances were shorter than distances from bait diggers and walkers. Some species found on tidal flats were slow to return after disturbance by walkers, sometimes taking 25 minutes to come back to a site.

Citations: This article is not available on Google Scholar. Similar articles are unknown.

EAEST CONCLUSION: This paper has not been published because it was a thesis, it has not been peer reviewed, and has not been cited. EA does not suggest using this article in the Plan/EIS.

NEXT STEP: None.

29. Smit, C. J., and G. J. M. Visser. 1993. *Effects of disturbance on shorebirds: a summary of existing knowledge from the Dutch Wadden Sea and Delta area*. Wader Study Group Bull. 68:6-19.

Peer Reviewed: Yes

Study that analyzed a set of studies carried out at the Wadden Sea and Delta area. Paper addresses the effects of disturbance by various activities on shorebirds. The impacts of leisure activities and other activities on both foraging and resting birds were studied. The paper reviewed the data from several studies to explore the responses of various species of birds from activities in a variety of habitats. The effects of small airplanes, jets and helicopters are also considered, as are the effects of disturbance on food intake and behaviour of territorial birds. Frequent disturbance may force waders to abandon traditional high-tide roosts.

Citations: Cited on Google Scholar 72 times. Other similar papers include:

- Roberts. 1993. *Responses of foraging sanderlings to human approaches* (cited 27 times)
- Laursen et al. 2005. *Factors affecting escape distances of staging waterbirds* (cited 19 times)

Articles were found in biological journals

EAEST CONCLUSION: Although this study took place in Europe, it has been peer reviewed, cited numerous times, and includes a discussion of disturbance to birds from dogs as well as a description of different results of disturbance to shorebirds. Because of this EA suggests incorporating the results in this article (from Charles Pfister) into the impacts analysis of Chapter 4 for the Plan/EIS.

NEXT STEP: EA will read and review entire article and incorporate the results into the Literature Review section of Chapter 4.

30. Thoms, K., Kvitek, R.G., and C. Bretez. 2003. *Effects of human activity on the foraging behavior of sanderlings *Calidris alba**. Biological Conservation 109: 67-71

Peer Reviewed: YES

Urbanization and coastal development has dramatically reduced the beach habitat available for foraging shorebirds worldwide. This study tested the general hypothesis that recreational use of shorebird foraging areas adversely affects the foraging behavior of sanderlings *Calidris alba*. Observations conducted on two central California beaches from January through May and September through December of 1999 showed that increases in the number and activity of people significantly reduced the amount of time sanderlings spent foraging. Although the sample size was low, the most significant negative factor was the presence of free running dogs on the beach. The experimentally determined minimal approach distance did not vary significantly with the type of human activities tested. Based on these results, policy recommendations for minimizing the impact of human beach activities on foraging shorebirds include: (1) people maintain a minimum distance of 30 m from areas where shorebirds concentrate and (2) strict enforcement of leash laws.

Citations: Article has been cited 59 times on Google Scholar. Similar articles include:

- Berger. 1991. *Human activity influence and diurnal and nocturnal foraging of sanderlings (Calidris alba)* (cited 114 times)
- Yasue. 2005. *The effects of human presence, flock size and prey density on shorebird foraging rates* (cited by 32)

These studies are from scientific journals.

EAEST CONCLUSION: Because this study has been peer reviewed, cited numerous times, and includes a discussion of disturbance to birds from “free running” dogs on Californian beaches, EA suggests incorporating the results in this article (from Charles Pfister) into the impacts analysis of Chapter 4 for the Plan/EIS.

NEXT STEP: EA will read and review entire article and incorporate the results into the Literature Review section of Chapter 4.

GOGA Literature Suggested for Removal From Plan/EIS:

The following citations have been suggested for removal from the Plan/EIS through the PEPC comment database and/or the Charles Pfister letter comments to the draft Plan/EIS. The full citations that have been suggested are described, a summary of the article/paper/brochure has been prepared, a determination if the citation has been peer reviewed has been included, and the number of times the article/paper/brochure has been cited, as well as a conclusion proposed by EA and suggested next steps.

1. Numerous NPS Reports regarding the Western snowy plover at Ocean Beach

Peer Reviewed: No

These reports have been “picked apart by non-scientist off-leash dog advocates,” according to Charles Pfister. Mr. Pfister reviewed a number of studies done by GGNRA that were cited in the Draft Plan/EIS and states the following: “The number of incidences to disturbance and harassment of Western snowy plovers reported by NPS is small because the sampling method used by NPS: 1.) involved observers moving up and down the beach and surveying an entire segment of the beach and not watching specific flocks of plovers, and 2.) the sampling method did not attempt to specifically include observation periods when the level of disturbance was mostly likely to be severe, so the periods of peak disturbance, which may be very significant in assessing overall impacts are not presented in the data.”

As stated during public comments to the draft Plan/EIS in the PEPC database, these reports are “Unable to prove any impact on plover population numbers, the 1996 Hatch Report argued that dogs “disturb” plovers. However in the entire 1.5-year study, only 19 out of 5,692 dogs -- less than one-third of one percent -- were observed deliberately chasing plovers, and none was reported to actually catch or harm a bird. The report adds that on another 15 occasions, at least 100 additional plovers were “inadvertently disturbed” by dogs, comparing this to the 48 plovers inadvertently disturbed by people without dogs, implying dogs inadvertently disturb plovers at least twice as often as people alone. But a closer reading of the report shows that the disturbances from people were noted in about half the recording time (24 hours of observations) as that devoted to studying dogs (40 hours). Had the two groups been observed for equal amounts of time, the number of disturbances would have been nearly the same.”

Also stated during public comments to the draft Plan/EIS in the PEPC database, “The GGNRA’s own studies indicate that dogs have no significant negative impact on the population of snowy plovers at Ocean Beach. The Nov 15, 1996 report of snowy plovers by GGNRA staffer Daphne Hatch found that there was an increase of more than 100% in the number of snowy plovers in the years after the 1979 Pet

Comment [EMB10]: Daphne – can you respond to these comments from Charles Pfister?

Policy went into effect (allowing off-leash dogs on Ocean Beach and elsewhere). There was no negative relationship between the number of dogs and the numbers of plovers on the beach at the same time. Indeed, the 1996 Hatch Report says: *Factors other than the number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach.*"

Additional public comments to the draft Plan/EIS in the PEPC database: "A follow-up 2006 Hatch Report considers effects on the numbers of plovers after two Federal Court rulings reinstated the 1979 Pet Policy, allowing off-leash dogs back on Ocean Beach. According to the study, the maximum number of plovers ever recorded was in 1994, at a time when there were no restrictions on off-leash dogs on Ocean Beach. Numbers of plovers have varied since then, (from a low of 14 in 2000 to 35 in 2005), but there is no correlation between when numbers of plovers were low and when dogs were allowed off-leash. Indeed, data from the 2006 Hatch Report posted by the GGNRA on its website actually show an increase in plover numbers in 2005, the year after the first Court Ruling. The annual mean of snowy plover numbers (total number of plovers observed during all surveys in a year, divided by the number of surveys done that year) show an increase in plover populations after the Court rulings (from 26.55 in 2004 to 31.30 in 2005). The annual snowy plover median listed (the number of plovers counted in a single survey, with half the surveys counting more plovers than the median number and half the surveys reported less) is 28 for 2004 and 33 for 2005. Note that in the 2006 Hatch Report, an incident is classified as a "disturbance" when, in response to an off-leash dog, a plover lifted up its head and looked around. This overreaching and misuse of the term "disturbance" illustrates the bias inherent to the Hatch observational studies."

Citations: None

EAEST CONCLUSION: These studies have not been peer reviewed, have not been cited, and include discussions that have been controversial with many readers of the Plan/EIS. However, these are studies that NPS has conducted and reflect some of the only baseline information and disturbance from dogs we have regarding Western snowy plovers at Ocean Beach.

NEXT STEP: NPS please advise on these citations; we could possibly enhance the reports discussed above in the Plan/EIS with the updated LE Data that that park is compiling if specific incidences of Western snowy plovers are described (which for some criminal incident records that may be possible).

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2. Hatch, D., W. Merkle, and D. Press. 2007. *Status Report: Western Snowy Plovers and Recent Changes in Human and Dog Use within the Snowy Plover Management Area at Ocean Beach and the Wildlife Protection Area at Crissy Field*. Golden Gate National Recreation Area. Unpublished Report.

Peer Reviewed: No

Mr. Pfister reviewed this study conducted by GGNRA and describes the issues with the Hatch Report and basically determines it is not a scientifically defensible report and states the following: "The use of encounter rates as a measure of the rate of disturbance is an attempt to use the data set for something it is just not suited for....Given all the factors involved in determining the behavior, distribution, and abundance of snowy plovers, this is a pathetically low number of observational hours from which to draw any conclusions....Apparently in one hour I observed more instances of dogs disturbing Western snowy plovers than in the entire five years of this study."

Citations: None

EAEST CONCLUSION: This study has not been peer reviewed, has not been cited, and includes discussions that have been controversial with many readers of the Plan/EIS. However, this is a study that

NPS has conducted and reflects some of the only baseline information we have regarding Western snowy plover disturbance at Ocean Beach.

NEXT STEP: NPS please advise on the use of this report; we could possibly enhance the results of this report discussed above in the Plan/EIS with the updated LE Data that that park is compiling if specific incidences of Western snowy plovers are described (which for some criminal incident records that may be possible).

3. NPS. 2007e. *Bank Swallow Monitoring at Fort Funston, Golden Gate National Recreation Area 1993-2006*. Golden Gate National Recreation Area, San Francisco, CA. March [sometimes referred to as Hatch 2006 Bank Swallow Report].

Peer Reviewed: No

As stated during public comments to the draft Plan/EIS in the PEPC database: “Hatch’s Bank Swallow report 2006 makes conclusions which are not based on her data. She makes speculative statements about what dogs could do, but there is no evidence for damage, e.g., digging which leads to burrow collapse.”

Citations: None

EAEST CONCLUSION: This study has not been peer reviewed, has not been cited, and includes discussions that have been controversial with many readers of the Plan/EIS. However, this is a study that NPS has conducted and reflects some of the only baseline information and disturbance data we have regarding bank swallows at Fort Funston.

NEXT STEP: NPS please advise on the use of this report; we could possibly enhance the results of this report discussed above in the Plan/EIS with the updated LE Data that that park is compiling if specific incidences of bank swallows are described (which for some criminal incident records that may be possible).

4. Bekoff, M., and C.A. Meaney. 1997. *Interactions among Dogs, People, and the Environment in Boulder, Colorado: A Case Study*. Department of Environmental, Population, and Organismic Biology, University of Colorado, Boulder.

Peer Reviewed: No

Charles Pfister explains that this study is “hopelessly flawed” and that other studies such as Lenth et al. 2008 (cited in the Plan/EIS) show how unreliable the methods and results were of this Beckoff and Meaney 1997 Study and that their method of direct observation of dogs “flushing or chasing” wildlife did not detect significant disturbance impacts on mammals. Mr. Pfister also states that this survey takes place in open spaces areas in Boulder, CO and that “songbirds are rarely susceptible to harassment or disturbance by dogs. Their habitats, behavior, and the lack of ability of dogs to stalk them make songbirds essentially invulnerable to disturbance by dogs, unless a human trains a dog to located nests of ground nesting species.”

Citations: 11

EAEST CONCLUSION: It is suggested that EA will reword the Literature Review section of Chapter 4 that describes impacts to wildlife as a result of dogs. Impacts to both shorebirds and other landbirds such

as songbirds are currently lumped together, which is incorrect since these two groups of birds respond very differently to disturbance by dogs. If this study is removed from the impacts to shorebirds and presented separately in impacts to landbirds (inland birds such as songbirds), the validity of the impacts to both shorebirds and landbirds would be improved.

NEXT STEP: Keep discussion of this citation, but present results in a more appropriate sub-section, such as the Literature Review section of Chapter 4 that describes impacts to landbirds such as songbirds.

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5. Forrest, A., and C.C. St. Clair. 2006. *Effects of Dog Leash Laws and Habitat Type on Avian and Small Mammal Communities in Urban Parks*. *Urban Ecosystems* 9(2):51–66. April 2006.

Peer Reviewed: Unknown (likely)

Comment [EMB11]: Contact Charles Pfister for info

Charles Pfister explains that “the study has little relevance to the issues at hand in GGNRA, as the study involved songbirds, not shorebirds, and the habitats in the study were generally not comparable to GGNRA, especially the open beach areas used by shorebirds in GGNRA.”

As stated during public comments to the draft Plan/EIS in the PEPC database: “Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impact.”

Citations: 10

EAEST CONCLUSION: It is suggested that EA will reword the Literature Review section of Chapter 4 that describes impacts to wildlife as a result of dogs. Impacts to both shorebirds and other landbirds such as songbirds are currently lumped together, which is incorrect since these two groups of birds respond very differently to disturbance by dogs. If this study is removed from the impacts to shorebirds and presented separately in impacts to landbirds (inland birds such as songbirds), the validity of the impacts to both shorebirds and landbirds would be improved.

NEXT STEP: Keep discussion of this citation, but present results in a more appropriate sub-section, such as the Literature Review section of Chapter 4 that describes impacts to landbirds such as songbirds.

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6. Russell, W., J. Shulzitski, and A. Setty. 2009. *Case Study: Evaluating Wildlife Response to Coastal Dune Habitat Restoration in San Francisco, California*. *Ecological Restoration*. 27(4): 439-448.

Peer Reviewed: Unknown (likely)

Comment [EMB12]: Contact Charles Pfister for info

The Tetra Tech Report for Crissy Field Dog Group states that: “This study appears biased. The restricted area was restored with native vegetation while the unrestricted area was not restored. Wildlife was more abundant in the restored area but this may have been due to the replanted native vegetation”

Statement from Draft Plan/EIS: “At Fort Funston in GGNRA, a survey was conducted to determine the differences between a restricted/restored habitat that included a fenced exposure and was planted with native vegetation versus an unrestricted/unrestored habitat that included an area that received heavy visitor use, including off leash pets and was not planted with native vegetation (Shulzitski and Russell 2004, 5). Results of the survey detected two to three times more wildlife (bird, amphibian, reptile, and

mammal species) in the restricted/restored habitat compared to the unrestricted/unrestored habitat (Shulzitski and Russell 2004, 18). As suggested by Shulzitski and Russell (2004, 5), heavy off-leash dog use increases deterioration of native dune communities.”

Citations: None.

EAEST CONCLUSION: the point of the above study was to correlate impacts to vegetation and wildlife as a result of dogs in a ROLA at GGNRA to the unrestricted/unrestored habitat in the study.

NEXT STEP: Keep discussion of this citation, but perhaps add a statement describing further the correlation between ROLA habitats and the unrestricted/unrestored habitat in the study in the Literature Review section of Chapter 4 that describes impacts to wildlife and habitat.

| Total # of Actions | Action # per year | Proj # | G/OA/T/B | OA | Project Title | Last Name | First | PRC Date |
|--------------------|-------------------|---------|----------|------------|--|------------|-------|-----------|
| 1070 | | 05-008 | P | | K-rail and Fencing at Fort Point | Turpie | S | 23-Mar-05 |
| 1069 | 30 | 05-007 | P/OA | Trust | Toll Plaza Transfer Points and Merchant Road Improvements Project | Kwok | S | 23-Feb-05 |
| 1068 | 29 | 05-006 | P/OA | Trust | Final Configuration of Battery Crosby Road at Baker Beach Disturbed Area 3 | Yata | J | 23-Feb-05 |
| 1067 | 28 | 05-005 | OA | | "Halley's Comet" film shoot | Lavrov | N. | 09-Feb-05 |
| 1066 | 27 | 05-004 | P | | Crissy Airfield East End Enhancement Project | He | L. | 12-Jan-04 |
| 1065 | 26 | 05-003 | P/OA | Trust | Realignment of Merchant Road | Castellini | L. | 15-Dec-04 |
| 1064 | 25 | 05-002 | OA | Trust | Geotech and Cultural Resource Investigations, Baker Beach 1 and | Ford | G. | 17-Nov-04 |
| 1063 | 24 | 05-001 | OA | NOAA | Predesign services, Gulf of the Farallones National Marine Sanctuary | Novak | J | |
| 1062 | 23 | 04-018 | OA | | Drift Card Study of <i>Spartina</i> dispersal from San Francisco and Hu | Ward | | |
| 1061 | 22 | 04-017 | P/OA | USGS | Baseline Monitoring of Emergent Contaminants at Crissy Field | Ward | K. | |
| 1060 | 21 | 04-016 | OA | University | Water Quality Instrument Deployment on NOAA Pier | Ward | K. | |
| 1059 | 20 | 04-015 | OA | | Sand for Presidio Restoration | Ford | G | 30-Jun-04 |
| 1058 | 19 | 04-014 | P | | Tree Removal at Inspiration Point | Strathmann | K. | |
| 1057 | 18 | 04-013 | P | | Invasive Decadent and Hazardous Tree removal | Brastow | P. | 18-Jun-04 |
| 1056 | 17 | 04-012 | OA | SF Genera | Hearts in San Francisco Fundraiser | Evenson | R. | |
| 1055 | 16 | 04-011 | P | | Replace Fort Point Wave Gate | Kren | J | |
| 1054 | 15 | 04-010 | P | | San Francisco Bay Trail in the Presidio | Lucas | A. | 19-May-04 |
| 1053 | 14 | 04-003C | P | | Crissy Field Landscape Improvements (Protective Fencing) | Angell | G. | 21-Apr-04 |
| 1052 | 13 | 04-009 | P | | Lobos Creek Boardwalk Nature Guide Installation | Elder | W. | |
| 1051 | 12 | 04-008 | P | | Bay Floor Wayside Installation | Elder | W. | |
| 1050 | 11 | 04-007 | P/OA | USCG - SF | Interagency Aquatic Rescue Exercise | Evans | J. | |
| 1049 | 10 | 04-006 | OA | KBAY Rad | Pet Fair | Moses | M. | |

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|------|----|----------|------|------------|---|----------------|---------|-----------|
| 1048 | 9 | 04-003B | P | GGNPC | Crissy Field Landscape Improvements | Angell | G. | 24-Mar-04 |
| 1047 | 8 | 04-003A | P | Conservan | Crissy Field Landscape Improvements | Angell | G. | 25-Feb-04 |
| 1046 | 7 | 04-005 | P | | Archaeological Site Stabilization at CA-SFR-5 (Point Lobos Archaeological District) (PARKWIDE PROJECT ALSO FILED UNDER | Barker | L. | 25-Feb-04 |
| 1045 | 6 | 04-004 | OA | CCSF | Sea Cliff Storm Drain Installation | Castellini | L. | 25-Feb-04 |
| 1044 | 5 | 04-003 | P | | Crissy Field Landscape Improvements | Angell | Glen | 28-Jan-04 |
| 1043 | 4 | 04-002 | P | | Cordgrass collection for use in research study | Ward | Kristin | |
| 1042 | 3 | 04-001 | P | | Caution stripping for Bike path | English | | |
| 1041 | 2 | 03-035 | P/OA | | Asbestos in Serpentine Soil Evaluation (Fiscal Year 04 - was misnumbered) | Ford | G | 03-Dec-03 |
| 1040 | 1 | 03-034 | P/OA | | Celebrate Trails Forever Dinner (Fiscal Year 04 - was misnumbered) | Powell | C | |
| 1039 | 35 | 03-033 | OA | Trust | Scoping for Public Health Services Hospital EA | Pelka | J | 28-Sep-03 |
| 1038 | 34 | 03-032 | P/OA | | | | | |
| 1037 | 33 | 03-031RC | P | | San Francisco Spineflower genetic research | Brastow | P. | |
| 1036 | 32 | 03-030 | P | | Long Avenue/Marine Drive Test Closure | Lucas | A. | 10-Sep-03 |
| 1035 | 31 | 03-029 | P/OA | Conservanc | Re-seeding Grass Surface Parking Panel at East Beach | Fox | N. | 10-Sep-03 |
| 1034 | 30 | 03-028 | P | | Centennial of Flight Event | Haller/Evenson | R. | 27-Aug-03 |
| 1033 | 29 | 03-027 | P/OA | Trust | Presidio Water Recycling Project | Wollenweber | M. | 27-Aug-03 |
| 1032 | 28 | 03-026 | P | | San Francisco Bay Trail in the Presidio | Lucas | A. | 13-Aug-03 |
| 1031 | 27 | 03-025 | P | | Vegetation Restoration of Landfill Removals at Baker Beach Disturbed Areas 3 and 4 | Lee | G | 30-Jul-03 |
| 1030 | 26 | 03-024 | T | | Landfill Removals at Baker Beach Disturbed Areas 3 and 4 and Fill Site 6A | Ullensvang | B | 30-Jul-03 |
| 1029 | 25 | 03-023 | OA | Komen | Komen Race for the Cure | Evenson | R | 30-Jul-03 |
| 1028 | 24 | 03-022 | P | | Crissy Field Information Table Pilot Project | Levitt | H | 02-Jul-03 |
| 1027 | 23 | 03-021 | OA/P | | Presidio Firing Range Remedial Investigation/Feasibility Study | Nelson | C | 18-Jun-03 |
| 1026 | 22 | 03-020 | P | | Installation of road sign for Crissy Field Center | Fox. | N | |

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|------|----|---------|----|--|---|---------------|---|-----------|
| 1025 | 21 | 03-019 | OA | | Golden Gate Bridge Toll Plaza Admin. Bldg. Wireless Telecom Facility (WTF) | Batlan | P | 07-May-03 |
| 1024 | 20 | 03-018 | OA | | West Bluff Parking Lot Electronic Gate Control Modifications | Helmbrecht | M | |
| 1023 | 19 | 03-017 | OA | | Baker Beach Disturbed Areas 1 and 2 Remedial Investigation - Phase 2 | Ford | G | |
| 1022 | 18 | 03-016 | OA | | Baker Beach Disturbed Areas 1 and 2 Remedial Investigation – Phase I | Ford | G | |
| 1021 | 17 | 03-015 | OA | | Avon Walk for Breast Cancer Wellness Villiage | Evenson | R | 23-Apr-03 |
| 1020 | 16 | 03-014 | OA | | Behavior, Ecology, and Distribution of Mesopredators in the Presidio | Boydston | E | |
| 1019 | 15 | 03-013 | OA | | Crissy Field Remediation Completion - supplemental | Ford | | |
| 1018 | 14 | 03-012 | P | | Mechanical Opening of Crissy Marsh Tidal Inlet | McLaughlin | | |
| 1017 | 13 | 03-011 | P | | Rare Dune Plants Reintroductions | Ward | | |
| 1016 | 12 | 03-010 | P | | Presidio Trust Remediation Schedule Update | Ullensvang | | 26-Feb-03 |
| 1015 | 11 | 03-009 | OA | | Presidio Quail Habitat Enhancement | Raffa | | 12-Mar-03 |
| 1014 | 10 | 03-008 | P | | NOAA Pier Rehabilitation | Turpie | | 15-Jan-03 |
| 1013 | 9 | 03-007 | OA | | PG&E Seacliff 4 Gas Pipeline Replacement | Owens | | |
| 1012 | 8 | 03-006 | P | | Baker Beach Disturbed Areas 1 and 2 Remediation - Scoping | Ford | | 18-Dec-02 |
| 1011 | 7 | 03-005A | OA | | Rip-Rap Replacement at the Crissy Field Skeet Range | Ford | | 18-Dec-02 |
| 1012 | 6 | 03-006 | P | | Install six new park benches on west side of Building 989 | Oravec | | |
| 1011 | 5 | 03-005 | OA | | Rip-Rap Replacement at the Crissy Field Skeet Range | Ford | | 04-Dec-02 |
| 1010 | 4 | 03-004 | OA | | Komen San Francisco Race for the Cure - Mitigation & Monitoring | Beckerman | | 20-Nov-02 |
| 1009 | 3 | 03-003 | P | | Analysis of Dune Plant Growth in the Presidio | Bastrow | | |
| 1008 | 2 | 03-002 | OA | | Golden Gate Bridge Seismic Phase II - Truck deliveries through the West Bluff Parking Lot | Majors | | |
| 1007 | 1 | 03-001 | P | | Fill Site 5 Vegetation Restoration Action Plan | Castellini | | 23-Oct-02 |
| 1006 | 38 | 02-035 | OA | | Coasal Fortifications UST removal | Seelbach | | |
| 1005 | 37 | 02-034 | OA | | Seacliff Outfall #6 Rehabilitation | Pearl (SFPUC) | | |

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|------|----|----------|------|--|---|------------|--|-----------|
| 1004 | 36 | 02-033 | OA | | Baker Beach Disturbed Area 3 Groundwater Investigation | Coats | | |
| 1003 | 35 | 02-032 | P | | Coastal bluffs Monterey Cypress Removal | Brastow | | |
| 1002 | 34 | 02-031 | OAP | | Gathering of Costanoan-Rumsen Carmel Tribe at Crissy Field | Scolari | | |
| 1001 | 33 | 02-030 | OA | | Fiber Optic Line Relocation to accommodate Golden Gate Bridge Public Safety Seismic Retrofit Project. | Batlan | | 14-Aug-02 |
| 1000 | 32 | 02-029 | OA | | Warning Signs along Linclon Blvd between Kobbe and Pershing | Marshall | | 31-Jul-02 |
| 999 | 31 | 02-028 | P | | Scoping for Bay Trail in the Presidio | Lucas | | 17-Jul-02 |
| 998 | 30 | 02-027 | OA | | Temporary closure under the Golden Gate Bridge on the Battery East Road bike trail | Lucas | | 03-Jul-02 |
| 997 | 29 | 02-026 | P/OA | | Crissy Field Lockable Bulletin Board at East Beach Restroom | Coss | | |
| 996 | 28 | 02-025 | P/OA | | Repaving, Signs, and Striping on Merchant Street | Lucas | | 03-Jul-02 |
| 995 | 27 | 02-018A | P | | Stop Signs and Crosswalks at Lincoln and Merchant Streets | Lucas | | 03-Jul-02 |
| 994 | 26 | 02-024 | P | | Extra garbage cans during special events and holidays | Oravec | | |
| 993 | 25 | 02-023 | P | | Replace existing Pacific Haregrass with Creeping Red Fescue | Oravec | | |
| 992 | 24 | PR01-41A | P | | Fort Point Temporary Wayside Installation | Elder | | |
| 992 | 23 | 02-022 | OA | | Telecom Relocation to accommodate Golden Gate Bridge Public Safety Seismic Concerns | Batlan | | 03-Jul-02 |
| 991 | 22 | PR-007A | OA | | Golden Gate Bridge Toll Plaza Admin. Bldg. Wireless Telecommunications Site | Batlan | | 05-Jun-02 |
| 990 | 21 | 02-021 | P | | Rare Dune Plants Reintroductions | Brastow | | |
| 989 | 20 | 02-020 | T | | Building 900s Area Additional Sampling | Ford | | |
| 988 | 19 | 02-019 | T | | Provide Dedicated Electrical Power to Lobos Creek Flow Meter | Sierra | | |
| 987 | 18 | 02-018 | P | | Stop Signs and Crosswalks at Lincoln and Merchant Streets | Lucas | | 24-Apr-02 |
| 986 | 17 | 02-017 | P | | Field Investigations at Landfills 8 and 10 | Ullensvang | | 10-Apr-02 |
| 985 | 16 | 02-016 | P | | Commissary/PX Site Investigation | Ullensvang | | 10-Apr-02 |
| 984 | 15 | 02-015 | P | | Lobos Dunes Trail Benches | Baker | | |
| 983 | 14 | 02-014 | OA | | 18th Annual JP Morgan Chase Corporate Challenge Run | Beckerman | | 13-Mar-02 |
| 982 | 13 | 02-013 | P | | Fort Point Comfort Station - Design | Ung | | 13-Feb-02 |
| 981 | 12 | 02-012 | P | | Presidio Fortifications UST Investigation | Ullensvang | | |
| 980 | 11 | 02-011 | P | | Raven's Manzanita Fence Extension | Strathmann | | |
| 979 | 10 | 02-010 | OA | | Komen San Francisco Race for the Cure | Beckerman | | 16-Jan-02 |
| 978 | 9 | 02-009 | OA | | International Outdoor Festival | Beckerman | | 16-Jan-02 |
| 977 | 8 | 02-008 | G | | Windmasters for NOAA Visitor Center | English | | 16-Jan-02 |
| 976 | 7 | 02-007 | OA | | Golden Gate Bridge Toll Plaza Admin. Bldg. Wireless | Batlan | | 05-Dec-01 |

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|-----|----|----------|----|--|---|-----------------|--|-----------|
| 975 | 6 | 02-006 | B | | Scoping for Landfill Removals at Baker Beach Disturbed Areas 3 & 4 | Ullensvang | | 21-Nov-01 |
| 974 | 5 | 02-005 | G | | Crissy Field Tidal Marsh Closure Protocol & East Beach Adaptive | Angell | | 05-Dec-01 |
| 973 | 4 | 02-004 | G | | Battery East Tree Removal | Brastow | | 24-Oct-01 |
| 972 | 3 | 02-003 | B | | Interim Remedial Action at Landfill 4 and Fill Site 5 | Ford | | 24-Oct-01 |
| 971 | 2 | 02-002 | B | | Building 102 Seismic Retrofit - Start of Construction (Information) | Rios | | 24-Oct-01 |
| 970 | 1 | 02-001 | G | | Battery East Road Project | Lucas | | 24-Oct-01 |
| 969 | 47 | 01-044 | G | | Battery East Eucalyptus Tree Removal | Brastow | | 29-Aug-01 |
| 968 | 46 | 01-043 | G | | Fort Point Non-Native Tree Removal | Brastow | | 29-Aug-01 |
| 967 | 45 | 01-042RC | G | | Let the Bones Tell their Story | Fong | | |
| 966 | 44 | 01-041 | B | | Presidio Waysides Phase II | Elder | | 15-Aug-01 |
| 965 | 43 | 01-040 | G | | The California Pacific Medical Center Company Picnic | Beckerman | | 15-Aug-01 |
| 964 | 42 | 01-039 | B | | Improve the Battery East Road and the Toll Plaza Area | Lucas | | 15-Aug-01 |
| 963 | 41 | 01-038 | B | | Lead Base Paint in Soil Investigation and Remediation | Ullensvang | | |
| 962 | 40 | 01-037 | B | | Presidio-wide Internal Shuttle | Tilles | | |
| 961 | 39 | 01-036 | B | | Drip Line LBP in Soil Remediation | Ullensvang | | |
| 960 | 38 | 01-035 | G | | Gathering of Costanoan-Rumsen Carmel Tribe at Crissy Field | Scolari | | |
| 959 | 37 | 01-034 | T | | Presidio Water Reclamation System | Kelly | | 01-Aug-01 |
| 958 | 36 | 01-033 | T | | Presidio Trust Implementation Plan | Pelka | | 06-Dec-00 |
| 957 | 35 | 01-032 | G | | Crissy Field Special Events Interim Standard Operating Procedure (Final Approval) | Higgins-Evenson | | 17-Jan-01 |
| 956 | 34 | 01-031 | B | | Install Flow Meter at Lobos Creek (Intake) | Sacks | | |
| 955 | 33 | 01-030 | B | | Individual Rights/MUD Concert | Higgins-Evenson | | 06-Jun-01 |
| 954 | 32 | 01-029 | G | | Replace Beach Access/Staircase Baker Beach | Collman | | |
| 953 | 31 | 01-028 | B | | Landfill 4 and Fill Site 5 | Ullensvang | | 06-Jun-01 |
| 952 | 30 | 01-027 | B | | Inspiration Point Viewshed Enhancement Project | Strathmann | | 09-May-01 |
| 951 | 29 | 01-026 | B | | Inspiration Point Rare Plant Enhancement Project | Strathmann | | 09-May-01 |
| 950 | 28 | 01-025 | B | | Feral Dunes Remnant Scrub | Lee | | 25-Apr-01 |
| 949 | 27 | 01-024 | G | | Gathering of Willow in the Park by Ohlone Community for use in | Scolari | | |
| 948 | 26 | 01-023 | G | | Crissy Field Wayside Exhibits and Kiosk | Levitt | | |
| 947 | 25 | 01-022 | B | | West Crissy Field Scrub Planting, Building 937 | Brastow | | |
| 946 | 24 | 01-021 | OA | | Basewide Groundwater Monitoring | Ullensvang | | 11-Apr-01 |
| 945 | 23 | 01-020 | OA | | Battery Howe-Wagner Additional Field Investigation | Ullensvang | | 28-Mar-01 |
| 944 | 22 | 01-019 | OA | | Crissy Field Restoration Projects, East Beach Parking Changes | Angel | | 14-Mar-01 |
| 943 | 21 | 01-018 | G | | Golden Gate Overlook, Crissy Field | Espinoza | | |
| 942 | 20 | 01-017 | G | | Tree Removals and Installation of Underground Utilities at Fort Point | Ung | | 14-Mar-01 |
| 941 | 19 | 01-016 | OA | | Baker Beach Emergency Call Box | Prokop/Scott | | |
| 940 | 18 | 01-015 | OA | | Repair to Telephone Line in the Lobos Creek Area, West of the PHS | Pribyl | | |
| 939 | 17 | 01-014 | G | | Arana Parcel #024/Lobos Creek Tree Removal | Collman | | |
| 938 | 16 | 01-013A | G | | Graded Area 9 Dune Scrub Vegetation Restoration Action Plan, | Echols | | 17-Jan-01 |
| 937 | 15 | 01-013 | B | | Graded Area 9 Dune Restoration | Ullensvang | | 06-Dec-00 |
| 936 | 14 | 01-012 | G | | East Beach Emergency Protection | Angell | | 22-Nov-00 |
| 935 | 13 | 01-011 | B | | Mountain Lake Sediment Sampling | Coats | | 22-Nov-00 |
| 934 | 12 | 01-010 | B | | Lobos Creek Diversion Structure Upgrade | Sacks | | |
| 933 | 11 | 01-009 | B | | Crissy Field Rifle Institute and Skeet Ranges Beach Area Cleanup | Ford | | 08-Nov-00 |
| 932 | 10 | 01-008 | B | | Building 223, Repairs/Improvements | Rios | | |
| 931 | 9 | 01-007 | B | | Presidio Bldg. 102 Seismic Retrofit | Rios | | |

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| 930 | 8 | 01-006 | B | | Presidio Trails and Bikeways Master Plan - Internal Scoping | Lucas | | 25-Oct-00 |
| 929 | 7 | 01-005B | G | | Crissy Field Opening Events | Levitt | | 28-Mar-01 |
| 928 | 6 | 01-005A | G | | Crissy Field Opening Scoping 2 | Levitt | | 06-Dec-00 |
| 927 | 5 | 01-005 | G | | Crissy Field Opening Scoping 1 | Levitt | | 25-Oct-00 |
| 926 | 4 | 01-004 | T | | Construct Dog Kennel at Building 1440D Battery Caulfield Road | Christie | | |
| 925 | 3 | 01-003 | T | | Renovate Bldg 786D to make it ADA Accessible, Presidio | Hood | | |
| 924 | 2 | 01-002 | T | | Presidio Park Sprint/Cellular One Co-location | Pepper | | 11-Oct-00 |
| 923 | 1 | 01-001 | T | | Opening of Historic Greenwich Gate | McCoy | | 11-Oct-00 |
| 923 | 89 | 00-112 | T | | Doyle Drive Interim Project to Repair Storm Damage | Radcliffe | | |
| 923 | 127 | 00-111 | G | | Fort Point Comfort Station-Site Selection | Ung | | 26-Oct-99 |
| 922 | 126 | 00-110 | T | | Public Health Service Hospital Buildings Lead in Soil Remediation | Larssen | | 27-Sep-00 |
| 921 | 125 | 00-109 | OA | | Presidio Golf Course Event Tent | McGrath | | |
| 920 | 124 | 00-108 | OA | | Gathering of Costanoan-Rumsen Carmel Tribe at Crissy Field | Scolari | | |
| 919 | 123 | 00-107 | T | | Hoy's Excelsior Cross-Country Race | Overman | | 13-Sep-00 |
| 918 | 122 | 00-106 | T | | San Francisco Maritime National Historical Park: Extension and Relocation | Perrelli | | |
| 917 | 121 | 00-105 | T | | San Francisco Unified School District: Presidio Child Development Center | Perrelli | | |
| 916 | 120 | 00-104 | T | | Parking Management, Ruger Street Area | Helmbrecht | | |
| 915 | 119 | 00-103 | OA | | GTE Wireless Cell Site, Golden Gate Bridge Toll Plaza | Louthan | | |
| 914 | 118 | 00-102A | B | | Update on Serpentine Bluffs Pilot Project (SBPP), Eucalyptus Understory Diversification Pilot (EUDP) | Farrell | | 13-Sep-00 |
| 913 | 117 | 00-102 | B | | Serpentine Bluffs Pilot Project (SBPP), Eucalyptus Understory Diversification Pilot (EUDP) | Albert | | 16-Aug-00 |
| 911 | 115 | 00-101 | G | | Crissy Field Special Events Interim Standard Operating Procedure | Higgins-Evenson | | 16-Aug-00 |
| 910 | 114 | 00-100.5 | G | | Sand Replacement at Crissy Field | Angell | | |
| 909 | 113 | 00-100 | G | | Adaptive Management Trial for Control of Rumex Acetosella in Lobos Creek Dunes, Presidio Area A | Albert | | |
| 908 | 112 | 00-099 | T | | Install Traffic Signs at Presidio-Wide Area B | Overton | | |
| 906 | 110 | 00-098 | T | | Presidio Trust Implementation Plan | Feierabend | | 16-Aug-00 |
| 905 | 109 | 00-097 | T | | Interim Lease of Building 210, Presidio | Perrelli | | 02-Aug-00 |
| 904 | 108 | 00-096 | T | | Temporary and Permanent Pathlighting-MacArthur | Munn | | |
| 903 | 107 | 00-095 | T | | Pacific Avenue Sewer Replacement | Albert | | |
| 902 | 106 | 00-094 | T | | ReLandscape Building 715 at Liggett Avenue, Presidio East Housing | Christie | | |
| 901 | 105 | 00-093A | OA | | Archaeological Testing for Doyle Drive Reconstruction | Foster | | 27-Sep-00 |
| 900 | 104 | 00-093 | OA | | Alternatives for Doyle Drive Reconstruction | Foster | | 19-Jul-00 |
| 899 | 103 | 00-092A | OA | | Temporary Construction Trailer for South Viaduct Retrofit Staff | Gervais | | 13-Sep-00 |

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| 898 | 102 | 00-092 | OA | | Office Trailer for Phase II Golden Gate Bridge Work | Gervais | | 19-Jul-00 |
| 897 | 101 | 00-091 | T | | Letterman Tile Memorial and Flagpole and Relocation | Razar/Christie | | |
| 896 | 100 | 00-090 | OA | | Temporary Platform Extension at Fort Point | Gervais | | 19-Jul-00 |
| 895 | 99 | 00-089 | T | | Fairway Restoration Trial, Presidio Golf Course | Conforti | | |
| 894 | 98 | 00-088A | T | | Nextel Proposed Antenna and Telecommunication Facility | Radcliffe | | 13-Sep-00 |
| 893 | 97 | 00-088 | T | | Nextel Proposed Antenna and Telecommunication Facility | Radcliffe | | 19-Jul-00 |
| 892 | 96 | 00-087 | T | | "Tagulaylay/The Presidio" Dance/Theater Presentation for Filipino History Month | White | | |
| 891 | 95 | 00-086 | T | | Sprint Proposed Antennas and Telecommunication Facility | Danz | | 05-Jul-00 |
| 890 | 94 | 00-085 | T | | Repair Strom Damage, US Route 101 at Presidio | Radcliffe | | |
| 889 | 93 | 00-084 | T | | Landscaping of Arguello Gate Intersection | Christie | | |
| 888 | 92 | 00-083 | T | | Crissy Field Area B Study, Presidio | McCoy | | 21-Jun-00 |
| 887 | 91 | 00-082 | T | | Mountain Lake Tank and Pump Station Removal and Well Abandonment | Skovlin | | 07-Jun-00 |
| 886 | 90 | 00-081 | T | | Short Term Leasing of MacArthur Avenue Housing | Ostrander | | 07-Jun-00 |
| 885 | 89 | 00-080 | T | | 5th Annual de Anza World Conference, Presidio | Hilstrom | | |
| 884 | 88 | 00-079 | T | | Soil Boring at Letterman Complex for the Proposed Letterman Digital Center, Presidio | Fa | | |
| 883 | 87 | 00-078 | T | | Installation of "Quail in Area Drive Carefully" Signs on the Presidio | Raffa | | |
| 882 | 86 | 00-077 | B | | Juan Bautista de Anza National Historic Trail | Lucas | | |
| 881 | 85 | 00-076 | T | | Interim Leasing of Building 108, Presidio of San Francisco | Wallace | | |
| 880 | 84 | 00-075 | T | | Tenant Improvements Building 37 Basement, Presidio | Wallace | | |
| 879 | 83 | 00-074A | T | | Master Leasing of Buildings 85, 86, and 87 by Alexa Internet, Presidio | Wallace | | |
| 878 | 82 | 00-074 | T | | Master Leasing of Buildings 85, 86, and 87 by Alexa Internet, Presidio | Perrelli | | 10-May-00 |
| 877 | 81 | 00-073 | G | | Fortification Upgrades: Coastal Defense Batteries | Scheumann | | |
| 876 | 80 | 00-072 | G | | Storm Water Pollution Protection Plan - Fort Point | Espinoza | | |
| 875 | 79 | 00-071 | T | | Presidio Parking Management Program | Perrelli | | 10-May-00 |
| 874 | 78 | 00-070 | T | | Interim Leasing - Funston Avenue Presidio Buildings 4 - 16 | Perrelli | | |
| 873 | 77 | 00-069 | T | | Interim Leasing - Mason Warehouses at Presidio Bldgs. 1182, 1183, 1184, 1185, and 1186 | Perrelli | | 10-May-00 |
| 872 | 76 | 00-068 | T | | Nursery Improvement/Habitarium Bldg 1244, Presidio | Ochi | | |
| 871 | 75 | 00-067 | T | | Crissy Field Remedial Action Plan Supplemental | Ford | | |
| 870 | 74 | 00-066 | T | | Building 35 Proposed Lease Agreement, Presidio | Perrelli | | 26-Apr-00 |
| 869 | 73 | 00-065A | T | | Revised Cellular One's Antenna Siting Proposal at Halleck and Vallejo Streets, Presidio | Danz | | 07-Jun-00 |
| 868 | 72 | 00-065 | T | | Cellular One's Antenna Siting Proposal at Halleck and Vallejo Streets, Presidio | Danz | | 26-Apr-00 |
| 867 | 71 | 00-064 | T | | Commissary Seeps Interim Source Removal, Presidio | Ford | | |
| 866 | 70 | 00-063 | T | | Temporary Lease of Building 682, Presidio | Perrelli | | 26-Apr-00 |
| 865 | 69 | 00-062 | T | | Building 38 Proposed Lease Agreement, Presidio | Perrelli | | 26-Apr-00 |
| 864 | 68 | 00-061 | T | | Clean and Paint Bridge (Presidio Viaduct) | | | |
| 863 | 67 | 00-060 | T | | Swords to Plowshares Veterans Academy Labyrinth Project, Presidio | | | 26-Apr-00 |
| 862 | 66 | 00-059RC | G | | Sediment Measurements at Crissy Field Tidal Wetland | Savage | | |
| 861 | 65 | 00-058 | T | | Tank Removal at Building 924 | Ford | | |

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| 860 | 64 | 00-057 | T | Interim Leasing - Gorgas Warehouses 1158, 1160, 1161, 1162, 1167, 1169, 1170 | Perrelli | | 12-Apr-00 |
| 859 | 63 | 00-056 | OA | "Sweet November"--Film Shoot at Crissy Field | Moses | | |
| 858 | 62 | 00-055 | T | Interim Leasing of Building 118, Presidio of San Francisco | Wallace | | |
| 857 | 61 | 00-054 | B | Building 1100/1110 Pre-Demolition Public Safety Training Opportunity | Spencer | | 12-Apr-00 |
| 856 | 60 | 00-053 | OA | Telecom Relocation to Accommodate Golden Gate Bridge Public Safety Seismic Retrofit Project | Batlan | | |
| 855 | 59 | 00-052 | T | Coast Guard Station-Electrical Service | Rios | | |
| 854 | 58 | 00-051 | T | Remove 5 Eucalyptus Trees and Dangerous Limbs Overhanging Building 1244 | Knauer | | |
| 853 | 57 | 00-050 | T | Presidio Clarkia Habitat Tree Removal | Knauer | | |
| 852 | 56 | 00-049 | T | Storm Water Pollution Prevention Plan - FY 2000 Interim Sampling Plan | Kelley | | |
| 851 | 55 | 00-048 | T | Investigation and Removal of Tanks at B-35 and 99, Presidio | Ford | | |
| 850 | 54 | 00-047 | T | Additional Environmental Sampling at the Presidio | Nelson | | 29-Mar-00 |
| 849 | 53 | 00-046 | T | California AIDS Ride | Schantz | | |
| 848 | 52 | 00-045 | T | Install Public Telephone at Building 34, Presidio Trust Bldg. | Radcliffe | | |
| 847 | 51 | 00-044 | G | Hazardous Tree Removal, Long Ave, Presidio | Collman | | |
| 846 | 50 | 00-043 | T | Environmental Sampling at PHS Area, Presidio | Reackhof | | |
| 845 | 49 | 00-042 | B | Lobos Creek Water quality Investigation and Management Plan | Williams | | 06-Mar-00 |
| 844 | 48 | 00-041 | B | 24th Annual Bridge to Bridge | Higgins-Evenson | | 29-Mar-00 |
| 843 | 47 | 00-040 | B | Environmental Assessment/Initial Study for Mountain Lake Enhancement Plan | Knauer | | 06-Mar-00 |
| 842 | 46 | 00-039A | T | Presidio Theater Project (Scoping) | Danz | | 07-Jun-00 |
| 841 | 45 | 00-039 | T | Presidio Theater Project | Danz | | 06-Mar-00 |
| 840 | 44 | 00-038 | B | Coast Live Oak Establishment Study: Vegetation Management Plan Pilot Project | Knauer | | |
| 839 | 43 | 00-037 | G | Tree Hazard Abatement | Percy | | |
| 838 | 42 | 00-036B | T | Addendum to "Interim Leasing/Nurses Quarters PR 00-036B | Perrelli | | 30-Aug-00 |
| 837 | 41 | 00-036A | T | Interim Leasing Program, Presidio, Bldgs. 1808, 1802, 1803 and 1805, 1806 (Nurses Quarters) | Perrelli | | |
| 836 | 40 | 00-036 | T | Interim Leasing Program, Presidio, Bldgs. 1808, 1802, 1803 and 1805 | Perrelli | | 16-Feb-00 |
| 835 | 39 | 00-035 | T | GTE Proposed Antenna Site at Presidio Hill | Danz | | 16-Feb-00 |
| 834 | 38 | 00-034A | G | Fort Point Mine Depot Building Area Rehabilitation | Coss | | 30-Aug-00 |
| 833 | 37 | 00-034 | G | Rehab Crissy Field Torpedo Wharf Buildings B 983, B 985, B986 | Coss | | 16-Feb-00 |
| 832 | 36 | 00-033 | G | Tree Removal at Battery Chamberlin, Presidio | Percy | | |
| 831 | 35 | 00-032 | T | Installation of Bicycle Racks, Building 605 (PX) | | | |
| 830 | 34 | 00-031 | G | Bay Area Ridge Trail Improvements, Area A | Percy | | 16-Feb-00 |
| 829 | 33 | 00-030 | G | Tree Removal at Battery Godfrey | Percy | | |
| 828 | 32 | 00-029 | T | Installation of Bicycle Racks, Building 204, Presidio | Sanchez | | |
| 827 | 31 | 00-028RC | OA | Document the Moss Flora of the Presidio National Park and GGNRA | Thomas | | |
| 826 | 30 | 00-027 | B | Crissy Field Storm Drain Rehabilitation Outfalls, I, J, and K | Kelly | | |
| 825 | 29 | 00-026 | T | Removal of Two Cypress Trees and Repair of Historic Wall | Dozier | | |

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| 824 | 28 | 00-025A | G | | Crissy Field Wetland and Associated Uplands Restoration Monitoring | Savage | | 10-May-00 |
| 823 | 27 | 00-025 | G | | Crissy Field Wetland and Associated Uplands Restoration Monitoring | Savage | | 02-Feb-00 |
| 822 | 26 | 00-024 | T | | Temporary Compost Site, Lower Battery Caufield | Blair | | |
| 821 | 25 | 00-023 | G | | Reintroduction of Suaeda Californica to the Presidio of San Francisco | Farrell | | 02-Feb-00 |
| 820 | 24 | 00-022 | OA | | Houlihan's to Houlihan's Race Event | Higgins-Evenson | | 02-Feb-00 |
| 819 | 23 | 00-021 | T | | Install Water Main Across Arguello Blvd, Presidio | Sacks | | |
| 818 | 22 | 00-020 | T | | Installation of Wayside Exhibit for Feral Dunes Habitat Restoration Site, Presidio | Raffa | | |
| 817 | 21 | 00-019 | T | | Installation of Additional Telecommunication Cabling to Baker Beach Apartments | Radcliffe | | |
| 816 | 20 | 00-018B | T | | Commissary Interim Source Removal Action | Ford | | 30-Aug-00 |
| 815 | 19 | 00-018A | B | | Commissary Area Interim Action: Site Investigation and Removal | Ford | | |
| 814 | 18 | 00-018 | B | | Interim Control of Commissary Contamination, Crissy Field | Ford | | |
| 813 | 17 | 00-017 | T | | Letterman Monitoring Well Decommissioning | Martin | | |
| 812 | 16 | 00-016 | T | | World War II Memorial Rehabilitation MWO 4163 | Christie | | |
| 811 | 15 | 00-015 | G | | Wildlife Brush Pile Placement in Crissy Field Dunes | Hatch | | |
| 810 | 14 | 00-014 | T | | Diesel Tank Relocation from Behind Letterman Hospital to Bldg 1355, Battery Dynamite | Dozier | | |
| 809 | 13 | 00-013 | G | | Crissy Field Design Modifications | Angell | | 07-Dec-99 |
| 808 | 12 | 00-012 | OA | | "Path to War" Filming, West Crissy Fields | White | | 07-Dec-99 |
| 807 | 11 | 00-011 | G | | Revegetation of Upper Del Mar Slopes | Albert | | |
| 806 | 10 | 00-010 | T | | Baker Beach Playground at Brooks Court | Chau | | |
| 805 | 9 | 00-009 | T | | Emergency Repair of Presidio Golf Course Lift Station | Fossen | | |
| 804 | 8 | 00-008 | G | | Reroute Lobos Creek Drain | Collman | | |
| 803 | 7 | 00-007 | G | | Crissy Field Marsh Opening | Evenson | | |
| 802 | 6 | 00-006 | OA | | Exploratorium - Event Bus Routes | Foote | | 10-Nov-99 |
| 801 | 5 | 00-005 | T | | Cyclo-Cross Nationals/Super Cup | Wippern | | 10-Nov-99 |
| 800 | 4 | 00-004 | OA | | Installation of AT&T/MFN Fiber Optic Cable, Presidio | Batlan | | |
| 799 | 3 | 00-003 | G | | Habitat Enhancement with Large Wood at Crissy Wetland | Fong | | |
| 798 | 2 | 00-002 | OA | | Special Park Uses Group (SOP) for Crissy Field Special Event | Evenson | | 26-Oct-99 |
| 797 | 1 | 00-001 | T | | Construction of Fence Around Commissary Receiving Area | Epps | | |
| 796 | 128 | 99-110 | OA | | Willow Trimming for Security of Adjacent Residence | Poinsot | | 19-Jan-00 |
| 795 | 127 | 99-109 | OA | | Fuel Oil Tank Removal at Presidio Building 742 through 748 | Ford | | |
| 794 | 126 | 99-108 | T | | Building 38 Fuel Tank Removal, Presidio | Ford | | |
| 793 | 125 | 99-107 | G | | Rebuild Staircase and Install Fence on Admin Trail, Fort Point | Percy | | |

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| 792 | 124 | 99-106 | G | | Widen Coastal Trail and Recontour the Surface, Presidio | Percy | | |
| 791 | 123 | 99-105 | G | | Close Social Trail and Install Fence at Battery East, Presidio | Percy | | 28-Sep-99 |
| 790 | 122 | 99-104 | OA | | Restoration of Historical Appearance, Bldg. 920, Presidio | White | | |
| 789 | 121 | 99-103 | G | | Drainage Ditch along Marine Drive, Fort Point | Coleman | | |
| 788 | 120 | 99-102 | G | | Plug Abandoned Well at Mountain Lake | Sacks | | |
| 787 | 119 | 99-101 | OA | | Backup Power Line Installation Between Bldg 300-400 Housing Area, Presidio | Sierra | | 15-Sep-99 |
| 786 | 118 | 99-100 | OA | | Raven's Manzanita Fence Realignment | Brastow | P. | |
| 785 | 117 | 99-099 | OA | | Golf Course Split Rail Fence, Presidio | Christie | K. | |
| 784 | 116 | 99-098 | G | | Main Post Implementation Planning--Scope of Work | Owens | P. | 31-Aug-99 |
| 783 | 115 | 99-097 | | | not assigned | | | |
| 782 | 114 | 99-096 | OA | | Quarry Road Playground, West side of Macarthur, near B-810, Presidio | Chau | E. | |
| 780 | 112 | 99-095 | G | | Fort Point Comfort Station-Site Selection | Ung | G. | |
| 779 | 111 | 99-094 | OA | | Stillwell Road Westbound Modification | Tilles | D. | 18-Aug-99 |
| 778 | 110 | 99-093 | OA | | Bus Shelter Scoping Project | Tilles | D. | 18-Aug-99 |
| 777 | 109 | 99-092 | OA | | Clean and Paint Bridge (Presidio Viaduct) | Cherry | R. | |
| 776 | 108 | 99-091 | OA | | Bldg 537 Underground Telecommunications Cable Installation | Radcliffe | S. | |
| 775 | 107 | 99-090A | OA | | San Francisco Bicycle Route Signage Proposal | Tilles | D. | 18-Aug-99 |
| 774 | 106 | 99-090 | OA | | San Francisco Bicycle Route Signs | Tilles | D. | 03-Aug-99 |
| 773 | 105 | 99-089 | T | | Log Recycling Program, Fort Scott | Vincent | A. | 21-Jul-99 |
| 772 | 104 | 99-088 | T | | Master Leasing of Buildings 35, 37, 38, & 85,86, 87, Presidio | Perrelli | J. | 21-Jul-99 |
| 771 | 103 | 99-087 | T | | Building 220 Planting and Irrigation | Chau | E. | |
| 770 | 102 | 99-086 | T | | Building 220 Rehabilitation and Leasing, Presidio | Perrelli | J. | 21-Jul-99 |
| 769 | 101 | 99-085 | OA | | Golf Course Hedge Replacement, 354 Pro shop & Restrnt | Christie | K. | |
| 768 | 100 | 99-084 | T | | El Presidio Archeological Field School 1999, Presidio Bldgs. 45, 49, 50 | Barker | L. | |
| 767 | 99 | 99-083 | G | | Stepwall at 72" Storm Drain Outfall, Crissy Field | Angell | G. | |
| 766 | 98 | 99-082C | G | | Repair Earthquake Damage and Miscellaneous Masonry Repairs Fort Point | Espinoza | | |
| 765 | 97 | 99-082B | G | | Repair Earthquake Damage and Miscellaneous Masonry Repairs Fort Point | Espinoza | | 22-Nov-00 |
| 764 | 96 | 99-082 | G | | Repair Earthquake Damage and Miscellaneous Masonry Repairs Fort Point | Kren | J. | |
| 763 | 95 | 99-082A | G | | Lead Abatement, Fort Point | Espinoza | | |
| 762 | 94 | 99-081 | B | | Recreational Trailways Master Plan - Presidio | Rios | M. | 06-Jul-99 |
| 761 | 93 | 99-080 | OA | | Installation of New Utility Pole at Fort Point Near Building T-989 | Glassner | C. | |
| 760 | 92 | 99-079 | OA | | Relocation of Fort Point Pay Phone | Glassner | C. | |
| 759 | 91 | 99-078 | T | | Minor Renovation of Building 67, Presidio | Radcliffe | S. | |
| 758 | 90 | 99-077 | T | | Move Sand from Sludge Tank to Beach, Presidio | Sacks | S. | |

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| 756 | 88 | 99-076 | T | | Doyle Drive Reconstruction Project | Tilles | D. | 08-Jun-99 |
| 755 | 87 | 99-075 | G | | Relocation of Fort Point Portable Toilets | Glassner | C. | |
| 754 | 86 | 99-074 | T | | Parking Management for the Presidio-Underground Parking Analysis | Tilles | R. | 26-May-99 |
| 753 | 85 | 99-073 | T | | Connect Fire Suppression to Bldg 10 | Sacks | S. | |
| 752 | 84 | 99-072 | T | | Backflow Assembly Protective Cages | Sacks | S. | |
| 751 | 83 | 99-071B | T | | Presidio Wayfinding Kiosks, Inspiration Point | Chau | | 07-Dec-99 |
| 750 | 82 | 99-071A | T | | Presidio Wayfinding Kiosks | Chau | E. | 18-Aug-99 |
| 749 | 81 | 99-071 | T | | Wayfinding Kiosks: 50% Design Phase | Chau | E. | 11-May-99 |
| 748 | 80 | 99-070B | T | | Building 36 Landscaping | Chau | E. | |
| 747 | 79 | 99-070A | T | | Building 36 Rehabilitation and Leasing | Perrelli | J. | 21-Jul-99 |
| 746 | 78 | 99-070 | T | | Building 36 Preliminary Selective Demolition and Salvage | Wallace | R. | 11-May-99 |
| 745 | 77 | 99-069 | T | | Building 637 Corrective Action Plan | Ullensvang | B. | |
| 744 | 76 | 99-068 | T | | Request for Qualification for Morton and Paul Goode Ballfields | Reackhof | S. | 28-Apr-99 |
| 743 | 75 | 99-067 | T | | Fuel Oil Tank Removal at Presidio Building 749 | Reackhof | S. | |
| 742 | 74 | 99-066 | B | | Controlled Live Fire Training, 639 Mason St., Presidio | Phipps | T. | 28-Apr-99 |
| 741 | 73 | 99-065 | T | | Replace Retaining Wall in Front of Bldg 1781, Water Plant, Presidio | Dozier | D. | |
| 740 | 72 | 99-064 | T | | Tree Trimming Along the Perimeter Fence of the Water Treatment Plant | Correia | D. | |
| 739 | 71 | 99-063 | T | | Repair Fire Suppression Feed Line, Officer's Club, Presidio, Bldg 50 | Grant | G. | |
| 738 | 70 | 99-062 | B | | R&C Permit, CAS Sediment Sampling Mountain Lake | Fong | D. | |
| 737 | 69 | 99-061 | G | | SPUG permit, Helicopter landing at Fort Scott | White | W. | 13-Apr-99 |
| 736 | 68 | 99-060 | T | | Repair of Ball Field at Morton St. | Carpenter | T. | |
| 735 | 67 | 99-059 | G | | PUC Subdrain Repair at Chemical Building and Habitat Damage Remediation at Lobos Creek | Poinsot | W. | |
| 734 | 66 | 99-058 | G | | SPUG permit, Use of Parking Lots for ESPN X-Games (PW 99-037) | Shines | G. | |
| 733 | 65 | 99-057 | G | | Crissy Field Environmental Remediation-Supplemental | Ullensvang | B. | |
| 732 | 64 | 99-056 | G | | Presidio Visitor Center Expansion | Anderson | B. | 13-Apr-99 |
| 731 | 63 | 99-055 | G | | Battery East Drainage | Scheumann | J. | |
| 730 | 62 | 99-054 | B | | Wetlands Delineation | Castellini | L. | |
| 729 | 61 | 99-053 | G | | Crissy Field Restoration Project Revised Grading | Angell | G. | 31-Mar-99 |
| 728 | 60 | 99-052 | T | | Bldg 558 Residential & Non Residential Leasing/Trust Information | Lehr | P. | 31-Mar-99 |
| 727 | 59 | 99-051A | T | | Swords to Plowshares New Lease | Atlas | W. | 26-May-99 |
| 726 | 58 | 99-051 | T | | Swords to Plowshares Veterans Academy | Chau | E. | 31-Mar-99 |
| 725 | 57 | 99-050 | T | | Presidio Earth Day 1999 | Todorov | S. | |
| 724 | 56 | 99-049 | G | | Tree Removal at Crissy Field, East Beach | Angell | G. | 16-Mar-99 |
| 723 | 55 | 99-048 | G | | Serpentine Soil Sampling at the Presidio | Albert | M. | |
| 722 | 54 | 99-047 | T | | Presidio Stables Exhibits Bldg 661 | Bankie | B. | |
| 721 | 53 | 99-046 | T | | Driveway Improvements and Compost Site Development | Whitt | J. | 16-Mar-99 |
| 720 | 52 | 99-024A | T | | Compost Program, Presidio | Blair | M. | 16-Mar-99 |
| 719 | 51 | 99-045 | T | | Tree Removal at Battery Blaney | Radcliffe | S. | |

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| 718 | 50 | 99-044 | T | | PG&E Non-Emergency Gas Leak Repair | Choi | J. | |
| 717 | 49 | 99-043 | T | | PG&E Non-Emergency Gas Leak Repair | Choi | J. | |
| 716 | 48 | 99-042 | T | | Renovate Bldg 106 for Pacific Union Company, Presidio | Lyons | B. | |
| 715 | 47 | 99-041 | G | | SPUG permit for "Bicentennial Man" Motion Picture Filming | White | W. | 03-Mar-99 |
| 714 | 46 | 99-040 | G | | R&C Permit for SF State University Collection at Mountain Lake | Sorrill | B. | |
| 713 | 45 | 99-039 | T | | Tree Trimming in Pygmy Forest | Giovanetti | D. | 16-Feb-99 |
| 712 | 44 | 99-038 | T | | High Voltage Power for Arnold Palmer Golf Course | Carpenter | T. | 16-Feb-99 |
| 711 | 43 | 99-037 | T | | Public Health Service Hospital RFQ | Aguilar | J. | 16-Feb-99 |
| 710 | 42 | 99-036 | T | | Golden Gate Transit Service Between the Presidio and Downtown San Francisco | Tilles | D. | 16-Feb-99 |
| 709 | 41 | 99-035A | B | | Bay Area Ridge Trail | Chau | E. | 03-Aug-99 |
| 708 | 40 | 99-035 | B | | Bay Area Ridge Trail | Hall | S. | 16-Feb-99 |
| 707 | 39 | 99-034 | T | | Petroleum Contaminated Soil Removal at Presidio Golf Course | Ullensvang | B. | |
| 706 | 38 | 99-033 | T | | Tree Removal 2 Trees (Black Acacia) | Whitt | J. | |
| 705 | 37 | 99-032 | T | | Hazardous Tree Removal | Vincent | A. | |
| 704 | 36 | 99-031 | T | | Acacia Removal | Vincent | A. | |
| 703 | 35 | 99-030 | T | | Accessible Walkway | Chau | E. | |
| 702 | 34 | 99-029 | G | | Crissy Field Environmental Remediation - Supplemental | Ullensvang | B. | |
| 701 | 33 | 99-028 | G | | "Nash Bridges" "Bad Guys Repel Out of Trees" | White | W. | |
| 700 | 32 | 99-027 | B | | Hoop World Basketball Tournament | Moses | M. | |
| 699 | 31 | 99-026 | T | | Presidio Salvage Program Warehouse Use | Vincent | A. | 19-Jan-99 |
| 698 | 30 | 99-025C | T | | Cellular One's Proposed Telecoms Fac at Presidio Bldgs 1211 & 1255 / Armistead & Hoffman Streets | Loeven | L. | 06-Jul-99 |
| 697 | 29 | 99-025B | T | | Cellular One's Antenna Siting Proposal | Wallace | D./ J. | 13-Apr-99 |
| 696 | 28 | 99-025A | T | | Cellular One's Proposed Telecoms Fac at Ft Scott | Anderson | B. | 03-Mar-99 |
| 695 | 27 | 99-025 | T | | Cellular One's Proposed Telecoms Fac at Ft Scott | Anderson | | 03-Feb-99 |
| 694 | 26 | 99-024A | T | | Compost Program, Presidio | Blair | | 16-Mar-00 |
| 693 | 25 | 99-024 | T | | Compost Program, Presidio | Vincent | A. | 19-Jan-99 |
| 692 | 24 | 99-023 | G | | Set Up Crissy Field Archeology Laboratory | Mayer | M. | |
| 691 | 23 | 99-022 | G | | Additional Tree Planting, Lincoln Blvd., Presidi | Poinsot | W. | 06-Jan-99 |
| 690 | 22 | 99-021 | G | | Research and Collection Permit, Mt Lake Survey | Thomas | T. | |
| 689 | 21 | 99-020 | G | | Site Investigation at Building 1349, Presidio | Ullensvang | B. | |
| 688 | 20 | 99-019 | G | | Crissy Field Environmental Remediation-Supplem | Ullensvang | B. | |
| 687 | 19 | 99-018 | G | | Replacement of Fuel Storage Tank at Bldg 68 | Ullensvang | B. | |
| 686 | 18 | 99-017 | T | | Wherry Housing Playground Sites (2), Presidio | Chau | E. | |
| 685 | 17 | 99-016 | T | | Funston Avenue Irrigation System Design, Presid | Christie | K. | 03-Mar-99 |
| 684 | 16 | 99-015 | T | | Ball Field Repair and Upgrade, Presidio | Carpenter | T. | 03-Feb-99 |
| 683 | 15 | 99-014 | T | | Stable Renovation, Presidio | Carpenter | T. | |
| 682 | 14 | 99-013 | T | | Wherry Housing Renovation, Phase III/IV, Presid | Jeffries | W. | 09-Dec-98 |
| 681 | 13 | 99-012 | T | | Renovation of Buildings on Portola Street and Liggett Street, Presidio | Henry | B. | 09-Dec-98 |
| 680 | 12 | 99-011 | G | | Soil Sampling at former LTTD Soil Treatment Are | Ullensvang | B. | |

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|-----|----|---------|---|--|---|------------|----|-----------|
| 679 | 11 | 99-010 | G | | Tank 970 Site Area Restoration, Presidio | Ullensvang | B. | |
| 678 | 10 | 99-009 | G | | Building 1065 Corrective Action Plan, Presidio | Ullensvang | B. | 24-Nov-98 |
| 677 | 9 | 99-008 | | | Not used | | | |
| 676 | 8 | 99-007 | T | | Removal of Sand from Lobos Creek Diversion | Sacks | S. | |
| 675 | 7 | 99-006A | T | | Landslide and Drainage Repair, Doyle Drive | Lau | | 10-Nov-99 |
| 674 | 6 | 99-006 | T | | Landslide and Drainage Repair, Doyle Drive | Presser | | 27-Oct-98 |
| 673 | 5 | 99-005 | G | | Crissy Field Community and Environmental Center | Coss | M. | 27-Oct-98 |
| 672 | 4 | 99-004 | G | | Drainage Improvements, Del Mar Area, Lobos Cree | Poinsot | W. | 27-Oct-98 |
| 671 | 3 | 99-003 | T | | Tree Trimming for High Voltage Line | Sierra | V. | 14-Oct-98 |
| 670 | 2 | 99-002 | B | | Bay Area Ridge Trail (BART) Alignment Alternatives-Presidio | Hall | S. | 14-Oct-98 |
| 669 | 1 | 99-001 | G | | Hexavalent Chromium Monitoring Wells | Ullensvang | B. | 14-Oct-98 |
| | 85 | 98-082 | G | | Staircase at El Polin Springs | Baczkowski | | |
| 668 | 84 | 98-081 | | | Visitor Information Stations | Gorham | | 01-Apr-98 |
| 667 | 83 | 98-077 | T | | Blackwood Acacia Tree Removal | Hall | S. | |
| 666 | 82 | 98-076 | G | | Pandemonium Outdoor | Moses | M. | |
| 665 | 81 | 98-075 | T | | Accessible Entry for Tennis Courts | Campbell | B. | |
| 664 | 80 | 98-074 | T | | Request for Qualifications-12 Historic Bldgs, Presidio | Perrelli | J. | 9/29/98 |
| 663 | 79 | 98-073 | G | | Crissy Field Education and Community Center | Coss | M. | 9/29/98 |
| 662 | 78 | 98-072 | B | | Fleet Week-Navy/Marines Event | White | W. | 9/29/98 |
| 661 | 77 | 98-071 | T | | Feral Scrub Tree Removal | Dennenberg | R. | |
| 660 | 76 | 98-070 | G | | Golden Gate Bridge Southend Lead Remediation | Shinomoto | O. | 9/16/98 |
| 659 | 75 | 98-069 | T | | Reroof Building PE1353 | Jenkins | R. | |
| 658 | 74 | 98-068 | T | | Rototilling for planting preparation | DeVault | B. | |
| 657 | 73 | 98-067 | T | | Temporary Encroachment Permit for Scaffolding | Radcliffe | S. | |
| 656 | 72 | 98-066 | B | | Information Wayside sign installation | Feierabend | C. | |
| 655 | 71 | 98-065 | B | | 25th Ave/Lincoln Blvd Entry Concepts | Chau | E. | 9/1/98 |
| 654 | 70 | 98-064 | G | | Truck Staging and Weighing Area, Battery East | Shinomoto | O. | 9/1/98 |
| 653 | 69 | 98-063 | G | | Borings at sewer failure site | Poinsot | W. | |
| 652 | 68 | 98-062 | T | | 3140 Pacific Avenue Scaffolding | Radcliffe | S. | |
| 651 | 67 | 98-061 | T | | Building 210 -- New Lease | Anderson | B. | |
| 650 | 66 | 98-060 | T | | Mountain Lake Sediment Sampling | Reackhof | S. | |
| 649 | 65 | 98-059 | T | | Officer Club Request for Qualification | Anderson | B. | 8/19/98 |
| 648 | 64 | 98-058 | G | | Post and Cable Fence | Albert | M. | |
| 647 | 63 | 98-057 | T | | Hydraulic Fluid Removal at Nike Missile Facility | Reackhof | S. | |
| 646 | 62 | 98-056 | T | | Building 34 Renovation and Maintenance | Anderson | B. | 8/4/98 |
| 645 | 61 | 98-055 | T | | Building 39 Rehabilitation and Renovation | Anderson | B. | 8/4/98 |
| 644 | 60 | 98-054 | T | | Wherry Housing Renovation Scoping | Anderson | B. | 04-Aug-98 |
| 643 | 59 | 98-054A | T | | Wherry Housing Renovation New Business | Anderson | | 19-Aug-98 |
| 642 | 58 | 98-053 | T | | Letterman LAIR RFQ for Leasing Tenant | Blackstone | J. | 8/4/98 |
| 641 | 57 | 98-052 | G | | Crissy Field Briefing | Angell | G. | 8/4/98 |
| 640 | 56 | 98-051 | B | | EPA Soil Samplingfor Lead Based Paint (Various Facilities) | Work | M. | |
| 639 | 55 | 98-050 | T | | Test Soil Conditions at Bldg 39 | Anderson | B. | |
| 638 | 54 | 98-049 | G | | Pampas grass control at fort point | Farrell | S. | |

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|-----|----|---------|---|--|--|------------|----|-----------|
| 637 | 53 | 98-039A | G | | Fiber Optic Relocation at Crissy Field | Angell | G. | 7/22/98 |
| 636 | 52 | 98-047 | G | | International Work Camp at Crissy Field | Sychoff | G. | 7/7/98 |
| 635 | 51 | 98-046 | G | | Battery Chamberlin Firing Gun Simulator | Martini | J. | 6/24/98 |
| 634 | 50 | 98-045 | G | | Archeological Investigation, Phase 1 | Angell | G. | 6/24/98 |
| 633 | 49 | 98-044 | G | | Work Plan for Investigation of Commissary and Post | Ullensvang | B. | 6/24/98 |
| 632 | 48 | 98-043 | G | | Sewer Line Re-route for Battery Blaney | Mannel | D. | 6/9/98 |
| 631 | 47 | 98-042 | T | | Road-Segment Improvement, Building 105/106, Lincoln | Hall | S. | 6/9/98 |
| 630 | 46 | 98-041 | | | Return/Remembrance Park Partner Ceremony-NJ | Pierce | K. | |
| 629 | 45 | 98-040 | | | Ornamental Plantings @ Child Care Center | Radcliffe | S. | |
| 628 | 44 | 98-039 | | | Relocate CF Fiber Optic Cable Duct Crissy Field | Angell | G. | 4/29/98 |
| 627 | 43 | 98-038 | | | Re-route Sanitary Sewer Lat Qtrs. 809 | Hansen | R. | |
| 626 | 42 | 98-037 | | | Eco Assess Insect Pollination Comm Assoc w/SF | Albert | M. | |
| 625 | 41 | 98-036 | | | Cement Staircase at Bernard Ave. | Baczkowski | S. | |
| 624 | 40 | 98-035 | | | Coastal Trail Tread Upgrade II | Baczkowski | S. | |
| 623 | 39 | 98-034 | | | Coastal Trail Tread Upgrade | Baczkowski | S. | |
| 622 | 38 | 98-033 | | | USPP Property Bldg. Extension | Herman | B. | |
| 621 | 37 | 98-032 | | | S.F. Community Recyclers | Lewis | S. | |
| 620 | 36 | 98-031 | | | Relocation of Grounds from Crissy Fld. Remediation Zone | Ferrari | L. | |
| 619 | 35 | 98-030 | | | Presidio Wayside Exhibits | Bankie | B. | |
| 618 | 34 | 98-029 | | | Storey Ave. Drainage Improvement | Ferrari | L. | |
| 617 | 33 | 98-028 | | | Temp Fence & Mobilization Area-Presidio | Radcliffe | S. | |
| 616 | 32 | 98-027 | | | 15 Year Anniv. Celebration, Presidio | Quintero | A. | 4/14/98 |
| 615 | 31 | 98-026 | | | Theatrical Perf. Proj. "Invisible Wings" Ft. Point | Griggs | T. | 4/14/98 |
| 614 | 30 | 98-025 | | | Presidio Trust-Building Nine Trench Work | Short | B. | |
| 613 | 29 | 98-024 | | | California Aids Ride | Moses | M. | |
| 612 | 28 | 98-023 | | | On-site Soil Treatability Study Using LTT Desorption | Howar | M. | |
| 611 | 27 | 98-022 | | | H2O Hookup/Temp. Irrigation-Presidio Viaduct Revegetation | Archibald | G. | |
| 610 | 26 | 98-021 | | | Motion Picture Crane/Remote Head Seminar | Shine | G. | |
| 609 | 25 | 98-020 | | | Soap Bos Derby Race | Shine | G. | |
| 608 | 24 | 98-019 | | | Landscape Bldg. 135, Presidio | Fox | N. | |
| 607 | 23 | 98-018 | | | Add'l Exploratory Borings at Crissy Field | Angell | G. | |
| 606 | 22 | 98-017 | | | Investigation-Suspected UST's Adj.FDS, Ft. Scott | Howar | M. | |
| 605 | 21 | 98-016 | | | Install Traffic Safety Mirror/Signs /Speed Bu | Ferrari | L. | |
| 604 | 20 | 98-015 | | | Install Recycling Receptacles/GOGA/Presidio Sites | Vincent | A. | |
| 603 | 19 | 98-014 | | | Install Metal Struct./Cover Fire Emer. Veh. B-1 | McCoy | C. | |
| 602 | 18 | 98-013 | | | Guinness Fleadh | Quintero | A. | 11/25/97 |
| 601 | 17 | 98-012 | | | Gas Service Clearance | Hadley | R. | |
| 600 | 16 | 98-011 | | | Crissy Field Monitoring Wells | Ullensvang | B. | |
| 599 | 15 | 98-010 | | | Relocate Manhole at Lincoln Blvd. | Knauer | J. | |
| 598 | 14 | 98-009 | | | Open Space Site Proposal for North of B 1007 Presidio of San Francisco | Knauer | J. | 3/4/98 |
| 597 | 13 | 98-008 | | | Replace Transformer in Manhole w/Pad Mounted Transformer | Cheung | S. | |
| 596 | 12 | 98-007 | | | Tree Pruning/Plant Removal PSF Bldg. 135 | Fox | N. | |
| 595 | 11 | 98-006 | | | Landscape Bldg. 1750, Lincoln Blvd. | Knauer | J. | |
| 594 | 10 | 98-005 | | | Proposed Changes to Proj. Review SOP | Golem | R. | 3/4/98 |
| 593 | 9 | 98-004 | | | Env'tl Invest/Sampling-Ft. Point Coast Guard Station | Ullensvang | B. | |
| 592 | 8 | | | | Holocaust Museum Exhibit | Muldoon | | 17-Feb-98 |

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|-----|----|---------|--|---|-------------|----|-----------|
| 591 | 7 | | | Watershed Monitoring Program for the Presidio | Fong | | 20-Jan-98 |
| 590 | 6 | 98-003C | | Crissy Field Environmental Remediation | Ullensvang | | 17-Feb-98 |
| 589 | 5 | 98-003B | | Crissy Field Remedial Action Plan Modifications | Ullensvang | | 20-Jan-98 |
| 588 | 4 | 98-003A | | (98003A) CF Environmtl. Remediation | Ullensvang | B. | 5/12/98 |
| 587 | 3 | 98-003 | | Crissy Field Remedial Action Plan | Ullensvang | B. | 10/28/97 |
| 586 | 2 | 98-002 | | Temp. Relocation/Chain Link Fence/1-3,14th Ave. | Ferrari | L. | |
| 585 | 1 | 98-001 | | Sand Ladder at Horse Stables | Percy | M. | |
| 584 | 73 | 97-088 | | Repair Firehouse | Clemon | A. | 08-Jan-97 |
| 583 | 72 | 97-079 | | Prune Monterey Cypress Tree for View Maintenance | Weeks | N. | 20-Aug-97 |
| 582 | 71 | 97-076 | | Slope Stabilization-Prot Utility/Fire Hydr.-Alcatraz | Torres | N. | |
| 581 | 70 | 97-075 | | Presidio Education Program | Fonfa | L. | |
| 580 | 69 | 97-073 | | Serpentine Soil Sampling-Presidio | Albert | M. | |
| 579 | 68 | 97-072 | | Tree Removal-J.Kahn Playground | Lord | B. | |
| 578 | 67 | 97-070 | | Utility Trench-Bldg. 1152 | McCoy | C. | |
| 577 | 66 | 97-069 | | Tree Hazard Abatement | Giovannetti | D. | |
| 576 | 65 | 97-068 | | Bldg 67 Accessible Site Design, Presidio | Amos | J. | 05-Aug-97 |
| 575 | 64 | 97-067 | | Presidio Gate Broadway Gate Comprehensive Design Plan Phase 1 and Phase 2 | Koch | K. | 25-Jun-97 |
| 574 | 63 | 97-065 | | Juan Bautista De Anza National Historic Trail Route Designation | Hamm | S. | 05-Aug-97 |
| 573 | 62 | 97-064 | | Crissy Field Geotechnical Investigation | Angell | G. | |
| 572 | 61 | 97-063 | | Baker Beach Sand Ladder Repair | Baczkowski | S. | |
| 571 | 60 | 97-062 | | Investigation of Fuel Dist. System | Blank | R. | |
| 570 | 59 | 97-061 | | Repair Golf Course Tunnel | Golem | R. | |
| 569 | 58 | 97-060 | | Archeological Survey-Funston Ave. | Barker | L. | |
| 568 | 57 | 97-059 | | El Polin Springs Playground Replacement | Perera | A. | 23-Jul-97 |
| 567 | 56 | 97-058 | | Draft Remedial Action Workplan-Environmental Clean-up | Ullensvang | B. | 25-Jun-97 |
| 566 | 55 | 97-057 | | Motion Picture Filming-ATL Productions | White | W. | |
| 565 | 54 | 97-056 | | Access to Private Residence at #4 Seacliff for Seismic Retrofit Work | Hadley | R. | 10-Jun-97 |
| 564 | 53 | 97-055 | | Make Thomas Ave. One Way | Ferrari | L. | |
| 563 | 52 | 97-054 | | Bldg. 386-Landscape Improvements | Koch | K. | |
| 562 | 51 | 97-053 | | Temp. Closure of Gorgas gate at Bldg. 1151 | McCoy | C. | |
| 561 | 50 | 97-051 | | Thoreau Ctr. Phase 2B O'Reilly St. Off. Qtrs. | Wallace | R. | |
| 560 | 49 | 97-050 | | Sprint Spectrum PCS Facility at Golden Gate Bridge Toll Plaza | Golem | R. | 18-Mar-97 |
| 559 | 48 | 97-049 | | Non-Native Tree Removal Within the Serpentine Grassland | Farrell | S. | 18-Mar-97 |
| 558 | 47 | 97-048 | | Replace Sewer Lines Vicinity of Lobos Creek | Swanson | C. | 18-Mar-97 |
| 557 | 46 | 97-047 | | Presidio Gate/Broadway Gate Entrance Rehabilitation | Feierabend | C. | 18-Feb-97 |
| 556 | 45 | 97-046 | | Junior League Golf Exhibition and Clinic | Hentchel | R. | 18-Feb-97 |
| 555 | 44 | 97-045 | | 25th Avenue Entrance Redesign and Landscaping Plan | Koch | K. | 05-Feb-97 |
| 554 | 43 | 97-044 | | National Indian Justice Center-Establish/Construct an | Quintero | A. | 05-Feb-97 |
| 553 | 42 | 97-043 | | Permanent Closure of Lincoln Boulevard Eastbound be | Koch | K. | 05-Feb-97 |
| 552 | 41 | 97-042 | | Cell Sites SOP | Golem | R. | 21-Jan-97 |
| 551 | 40 | 97-041 | | Caltrans Access Road at Pet Cemetery | Hadley | R. | 21-Jan-97 |
| 550 | 39 | 97-040 | | El Polin Springs Trail Re-route | Percy | M. | 21-Jan-97 |
| 549 | 38 | 97-039 | | Wherry Housing Film Permit SOP | Quintero | A. | 08-Jan-97 |
| 548 | 37 | 97-038 | | PSF Coastal Bluff Trail Plan | Albert | M. | 08-Jan-97 |

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| 547 | 36 | 97-037 | | Bldg. 106 Shrub Removal | Hall | S. | |
| 546 | 35 | 97-036 | | Lead Contamination Remed./Soil Removal | Blank | R. | |
| 545 | 34 | 97-035 | | Fuel Distribution System Removal-Additions to Project Scope | Blank | R. | 13-May-97 |
| 544 | 33 | 97-034 | | Golden Gate National Recreation Area Ordnance Plan | Martini | J. | 30-Apr-97 |
| 543 | 32 | 97-033 | | Tree Removal, Golden Gate Bridge District | Whitt | J. | 30-Apr-97 |
| 542 | 31 | 97-032 | | Install Generators and Housing to Support Building 1203 and 650, | Cheung | S. | 28-May-97 |
| 541 | 30 | 97-031 | | Bldg. 64 Reroofing and Seismic Upgrades | McCoy | C. | |
| 540 | 29 | 07-030 | | Primary Electric System Installation - PG&E Phase 1 | Swanson | C. | 15-Apr-97 |
| 539 | 28 | 97-029 | | St Francis Yatch Club Fleet Week Staging at Crissy Field | Shine | G. | 02-Apr-97 |
| 538 | 27 | 97-028 | | Construction of a Retaining Wall for Seacliff Residents | Clemons | A. | 02-Apr-97 |
| 537 | 26 | 97-026 | | Lobos Creek Invert Study | Warner | | |
| 536 | 25 | 97-025 | | Install Gas Svc. to Bldgs. 1182,1187&1188 | Swanson | C. | |
| 535 | 24 | 97-024 | | Additional Storage Space for Remediated Soil | Ferrari | L. | |
| 534 | 23 | 97-023 | | 1997 Presidio Earth Day Event | Farrell | S. | |
| 533 | 22 | 97-022 | | Non-Native Tree Removal Within and Around Battery McKinnon-Stottsenberg | Haller | S. | 02-Apr-97 |
| 532 | 21 | 97-021 | | Presidio Nursery Shade Structure & Native Plant Demonstration | Farrell | S. | 02-Apr-97 |
| 531 | 20 | 97-020 | | Burger King Corporate Event | Hentschel | R. | |
| 530 | 19 | 97-019 | | Lobos Creek Sediment Removal | Sacks | S. | |
| 529 | 18 | 97-018 | | Mountain Lake Mosquito Control | Fong | D. | |
| 528 | 17 | 97-017 | | Establish Muni Bus Stop at LAIR | Koch | K. | |
| 527 | 16 | 97-016 | | Temp. Closure of Richardson Drive | McCoy | C. | |
| 526 | 15 | 97-015 | | PG&E Plant Restoration & Beach Cleanup Event | Fortmann | T. | |
| 525 | 14 | 97-014 | | Military Housing Playground Renovations | Ferrari | L. | |
| 524 | 13 | 97-013 | | Fort Point Seawall Repair | Schuster | J. | |
| 523 | 12 | 97-012 | | Traffic Reroute | | | |
| 522 | 11 | 97-011 | | Skeet Range Hazard Fencing | Ullensvang | B. | |
| 521 | 10 | 97-010 | | PG&E Gas Line Repairs | Clemons | A. | |
| 520 | 9 | 97-009 | | PSF Tour Bus Incidntl. Biz Permit | Koch | K. | 08-Jan-97 |
| 519 | 8 | 97-008 | | YMCA Pool/Gym B-1151/1152 Site Improvements | McCoy | C. | |
| 518 | 7 | 97-007 | | Celebrity Golf Tournament | Quintero | A. | 08-Jan-97 |
| 517 | 6 | 97-006 | | Fiber Optic Cables-New Locations | Short | B. | |
| 516 | 5 | 97-005 | | Alcatraz Chimney Disp. Site-Bldg.64 Re-roof Project | Amos | J. | |
| 515 | 4 | 97-004 | | Baker Beach Access-Retaining Wall Design | Quintero | A. | |
| 514 | 3 | 97-003 | | Bldg. 640-Site Improvements | Haller | S. | |
| 513 | 2 | 97-002 | | Bldgs.1187/1188-Inst. Transformer & Elect. Meters | Swanson | C. | |
| 512 | 1 | 97-001 | | Bldg. 1188 Fiber Optics Cable Installation | Franke | R. | |
| 511 | 134 | | | Muni Route 29 - route change & proposed stops | koch | | 03-Dec-96 |
| 510 | 133 | 96-113 | | Proposed Residential Development at 18th Avenue | Hornor | N. | 03-Dec-96 |
| 509 | 132 | 96-112 | | DEH/DPW Site Remediation | Ullensvang | B. | 05-Nov-96 |
| 508 | 131 | 96-111 | | Establishment of Community Garden for Presidio Residents | Brouillette | P | 05-Nov-96 |
| 507 | 130 | | | 25th Ave Gate Site Design Scoping | Laughlin | | 23-Oct-96 |
| 506 | 129 | 96-110 | | MacArthur Tunnel Cell Site | Golem | R. | 23-Oct-96 |
| 505 | 128 | 96-109 | | Golden Gate Bridge Toll Plaza - Cell Site | Golem | R. | 23-Oct-96 |
| 504 | 127 | 96-108 | | Project TRUE | Levitt/S. Lewis | H. | 31-Jul-96 |
| 503 | 126 | 96-107 | | Basewide Environmental Protection Plan | Jarrat | D | 16-Jul-96 |

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|-----|-----|--------|--|--|-------------|----|-----------|
| 502 | 125 | 96-106 | | Entrance Sign Installation - Parkwide | Weeks/Fox | N. | 03-Jul-96 |
| 501 | 124 | 96-105 | | Crissy Field Special Event Guidelines SOP | Quintero | A. | 08-May-96 |
| 500 | 123 | 96-104 | | Golf Course New Facilities Preliminary Design/Env. Assessment | Hadley | R. | 24-Apr-96 |
| 499 | 122 | 96-103 | | Lobos Creek Sewer Failure Repair Alternatives | Hadley | R. | 26-Mar-96 |
| 498 | 121 | 96-102 | | Lobos Creek Culvert Design | Hornor | N. | 13-Mar-96 |
| 497 | 120 | 96-101 | | Tree Removal at Native Plant Restoration Sites | Farrell | S. | 28-Aug-96 |
| 496 | 119 | 96-100 | | Golf Course Irrigation Pumphouse and Driving Range | Golem | R. | 28-Aug-96 |
| 495 | 118 | 96-099 | | Lobos Creek Dunes Fencing | Cannon | A. | |
| 494 | 117 | | | Primary Electrical Distribution System at Letterman | Swanson | | 08-Oct-96 |
| 493 | 116 | 96-098 | | Northern Main Post Area - Storm Drain/Sewer Line Repair | Swanson | C. | 08-Oct-96 |
| 492 | 115 | 96-097 | | Building 640 - Excavation of Contaminated Soil | Jarrat | D | |
| 491 | 114 | 96-096 | | Building 207 - Contamination Plume Characterization | Jarrat | D | |
| 490 | 113 | 96-095 | | Chinese American School - Proposed Fence Installation | Ferrari | L. | |
| 489 | 112 | 96-094 | | Building 661 - Sanitary Sewer Repair | Amos | J. | |
| 488 | 111 | 96-093 | | Building 661 - Undergrounding Electric Lines | Amos/Sierra | J. | |
| 487 | 110 | 96-092 | | Buildings 1151/1152 Site Improvements | Kren | J. | |
| 486 | 109 | 96-091 | | SLUG Event/Bin Sale | Shine | G. | |
| 485 | 108 | 96-090 | | Compressed Natural Gas Fueling Station | Ozanich | J. | 13-Aug-96 |
| 484 | 107 | 96-089 | | Letterman/CCSF | Gasser | | 13-Aug-96 |
| 483 | 106 | 96-088 | | Building 218 - Firehouse Improvements | McCoy | C. | |
| 482 | 105 | 96-087 | | Flubber Film Permit | White | W. | 31-Jul-96 |
| 481 | 104 | 96-086 | | Building 1236 - Hazard Tree Removal | Giovannetti | D. | |
| 480 | 103 | 96-085 | | Building 385 Signs/Banners | Kren | J. | |
| 479 | 102 | 96-084 | | Building 218 - Geotechnical Soil Borings | McCoy | C. | |
| 478 | 101 | 96-083 | | Building 1750 (Maintenance Facility) Chemical Building | Amos | J. | 31-Jul-96 |
| 477 | 100 | 96-082 | | Cirque du Soleil Event | Quintero | A. | 31-Jul-96 |
| 476 | 99 | 96-081 | | Presidio Golf Course Driving Range Remodel | Golem | R. | 31-Jul-96 |
| 475 | 98 | 96-080 | | Building 1750 (Maintenance Facility) Emergency Operations | Johnson | B. | |
| 474 | 97 | 96-079 | | Motion Picture Film Permit - "The Game" | White | W. | |
| 473 | 96 | 96-078 | | Relocate Fencing Near Crissy Field Hangars | Swanson | C. | |
| 472 | 95 | 96-077 | | New Site Furnishings - Presidiowide | Laughlin | | |
| 471 | 94 | 96-076 | | Presidio Cell Site | Golem | R. | 18-Jun-96 |
| 470 | 93 | 96-075 | | Buildings 1151/1152 (YMCA) Recreation Facilities Improvement | Kren | J. | 16-Jul-96 |
| 469 | 92 | | | Proposal to develop overall planning guidance for Presidio Broadway gate entries and comprehensive design plans for the Presidio Blvd. Entry | Feierabend | | 28-Aug-96 |
| 468 | 91 | | | Arguello Gate Intersection Redesign | Brouillette | | 28-Aug-96 |
| 467 | 90 | 96-074 | | CCSF Bicycle Route Designation | Feierabend | C. | 28-Aug-96 |
| 466 | 89 | | | Rehabilitation of Bldg. 218 (Presidio Fire House) and construction of a building addition | McCoy | | 13-Aug-96 |
| 465 | 88 | | | Cirque du Soleil | Quintero | | 13-Aug-96 |
| 464 | 87 | | | Presidio Golf Course - Driving Range Remodel | Golem | | 13-Aug-96 |
| 463 | 86 | 96-073 | | Building 1332 - Fort Scott Resident's Landscaping | Hall | S. | |
| 462 | 85 | 96-072 | | Crissy Field Sewer Lift Station - Trenching | Fisher | T. | |
| 461 | 84 | 96-071 | | Presidiowide - Parking Lot Improvements | Dunham | C. | 03-Jul-96 |
| 460 | 83 | 96-070 | | Crissy Field - Army Environmental Bulletin Board | Blank | R. | 03-Jul-96 |
| 459 | 82 | 96-069 | | Presidio Playground Improvements | Perera | A. | |

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|-----|----|--------|--|---|---------------------|----|-----------|
| 458 | 81 | 96-068 | | Arguello/Moraga Intersection Modifications | Koch | K. | |
| 457 | 80 | 96-067 | | Fort Point Relocation of Weather Instruments | Philipps | V. | |
| 456 | 79 | 96-066 | | Building 385 - Addition of Exterior Lighting | Kren | J. | |
| 455 | 78 | 96-065 | | Electric Utility Re-route - Lincoln/Park/Mcdowell | Crone | K. | |
| 454 | 77 | 96-064 | | Annual Archeological Program - Presidiowide | Barker | L. | 05-Jun-96 |
| 453 | 76 | 96-063 | | Building 1801 - Storage of Contaminated Soils | Jarrat | D | |
| 452 | 75 | 96-062 | | Building 3 - Rebuild Entry Dock | McCoy | C. | |
| 451 | 74 | 96-061 | | Install Water Line and Valves | Ureta | B. | |
| 450 | 73 | 96-060 | | Building 35 (Communications Facility) - Roof and Gutter Repair | McCoy | C. | |
| 449 | 72 | 96-059 | | Thoreau Center - Temporary Photovoltaic Display | Kaserski | S. | |
| 448 | 71 | 96-058 | | Building 64 - Repair/Rehabilitation | McCoy | C. | |
| 447 | 70 | 96-057 | | Olympic Commercial Filming on Main Post Parade Ground | White | W. | |
| 446 | 69 | 96-056 | | Golf Course - Install Power Pole and Transformer | Cheung | S. | |
| 445 | 68 | 96-055 | | Building 667 (Army Records Center) - Building Modifications | Ewing-Haley | S. | |
| 444 | 67 | 96-054 | | Building 1750 (Maintenance Facility) - Emergency Operation | Prokop | S. | 05-Jun-96 |
| 443 | 66 | | | Draft Work Plan - Above Ground Storage Tank Removal | Jarrat | | 21-May-96 |
| 442 | 65 | | | Mountain Lake Park Proposed Pathway - SF Recreation Department | Thomas | | 08-May-96 |
| 441 | 64 | | | Golf Course EA - Summary of staff comments | Feierabend | | 08-May-96 |
| 440 | 63 | 96-053 | | 1996 Earth Day Activities | Farrell | S. | |
| 439 | 62 | 96-052 | | Fort Point - Paint Headquarters Building | Griggs | T. | |
| 438 | 61 | 96-051 | | Coast Guard Station - Remove/Replace Overgrown Hedges | | | |
| 437 | 60 | 96-050 | | Arguello Gate - Intersection Improvements | Koch | K. | 24-Apr-96 |
| 436 | 59 | 96-049 | | Building 1801 (Public Health Services Hospital) - Lead Asbestos Abatement | Jarrat | D | |
| 435 | 58 | 96-048 | | Commute Mobile Event | Koch | K. | |
| 434 | 57 | | | Army Environmental Clean Up Feasibility Study Update | Blank | | 24-Apr-96 |
| 433 | 56 | 96-047 | | Install Security Gates Throughout Presidio | Milestone/Forbes | | 24-Apr-96 |
| 432 | 55 | 96-046 | | Tree Limbing at Lobos Creek & Inspiration Point Restoration | Farrell | S. | 10-Apr-96 |
| 431 | 54 | 96-045 | | Building 1244 (Native Plant Nursery) - Paint/Install Mural | Farrell | S. | |
| 430 | 53 | 96-044 | | Install Dog Refuse Stations - Crissy Field & Lombard | Laughlin | | |
| 429 | 52 | 96-043 | | Building 385 - Provide Electric Service | Swanson | C. | |
| 428 | 51 | 96-042 | | Fort Point - Administrative Office Temporary Move | Griggs | T. | |
| 427 | 50 | 96-041 | | Building 135 (Golden Gate Club) - Courtyard Rehabilitation | Brouillette/N. Fox | P. | |
| 426 | 49 | | | Crissy Field Burn Buildings Update | Spencer | | 10-Apr-96 |
| 425 | 48 | | | Lobos Creek Sewer Failure Update | Hornor | | 10-Apr-96 |
| 424 | 47 | | | NPS / Army Environmental Bulletin Board on Crissy Field | Blank | | 10-Apr-96 |
| 423 | 46 | | | Install 14 Security Gates Throughout the Presidio | Milestone/Forbes | | 10-Apr-96 |
| 422 | 45 | 96-040 | | Underground Fuel Distribution System Removal-Contractor | Swanson/Jarrat | C | 10-Apr-96 |
| 421 | 44 | 96-039 | | Presidio Wayfinding/Street Sign Installation | Brouillette/S.Byers | P. | |
| 420 | 43 | 96-038 | | Underground Fuel Distribution System Removal - Work Plan | Jarrat | D | 13-Mar-96 |
| 419 | 42 | 96-037 | | Designation of Mushroom Collection Areas | Thomas | T. | 13-Mar-96 |
| 418 | 41 | 96-036 | | Log Cabin Area - Stormwater Line Repairs/Pipe Installation | Singleton | B. | |
| 417 | 40 | 96-035 | | Childcare Center Landscape/Ornamental Plantings | Hentschel | R. | |
| 416 | 39 | 96-034 | | Building 220 (Army Headquarters Building) - Construction Staging Area | White | G. | |
| 415 | 38 | 96-033 | | Permanent MUNI Bus Re-route | Sacks | P. | 27-Feb-96 |
| 414 | 37 | 96-032 | | Building 101/102 Site Improvements | Hall | S. | |

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|-----|-----|--------|--|--|---------------|----|-----------|
| 413 | 36 | 96-031 | | Sidewalk Repair/Replacement | Dunham | C. | |
| 412 | 35 | 96-030 | | Building 988 - Administrative Building Reuse | Griggs | T. | |
| 411 | 34 | | | Army Feasibility Study - Proposals for Cleanup of Contaminated Areas | Blank | | 27-Feb-96 |
| 410 | 33 | 96-029 | | Golf Course - Emergency Greens Reconstruction | Golem | R. | 27-Feb-96 |
| 409 | 32 | 96-028 | | GI Jane Film Permit Request | White | W. | 14-Feb-96 |
| 408 | 31 | 96-027 | | Wherry Housing - Construct/Operate Temporary Plant | Farrell | S. | 14-Feb-96 |
| 407 | 30 | 96-026 | | Pacific Bell Facility Relocation | Honor | N. | 14-Feb-96 |
| 406 | 29 | 96-025 | | McDowell/Park/Lincoln Intersection Improvements | Sacks/Crone | P. | 14-Feb-96 |
| 405 | 28 | 96-024 | | Lincoln/Halleck Intersection Improvements | Sacks/Crone | P. | 14-Feb-96 |
| 404 | 27 | 96-023 | | JOC Contractor - Staging Area | Weber | W. | |
| 403 | 26 | 96-022 | | Building 563 -Rehabilitation and Reuse | McCoy | C. | |
| 402 | 25 | 96-021 | | West Pacific Avenue - Tree Pruning for Viewshed | Weeks | N. | |
| 401 | 24 | 96-020 | | Building 10 (Funston Avenue) - Contractor Construc | White | G. | |
| 400 | 23 | 96-019 | | Building 42 - Soil Borings | White | G. | |
| 399 | 22 | 96-018 | | Soil Samples - Organic Recycling Area | Hall | S. | |
| 398 | 21 | 96-017 | | Golden Gate Bridge District - Food Service Kiosk | Hadley | R. | |
| 397 | 20 | 96-016 | | Building 386 - Tree Removal | Kren | J. | |
| 396 | 19 | 96-015 | | Child Care Center - Tree Removal | Hentchel | R. | |
| 395 | 18 | 96-014 | | Underground Storage Tanks - Additional Locations | Jarrat | D | |
| 394 | 17 | | | Battery Dynamite Bldg. 1355 Upgrade - Longterm use by Maintenance | Amos | | 17-Jan-96 |
| 393 | 16 | 96-013 | | Golden Gate Bridge District - Food Service Kiosk | Hadley | R. | |
| 392 | 15 | 96-012 | | Pre-establish 4 Construction Staging Areas for Construction Staging Area | Weber | W. | |
| 391 | 14 | 96-011 | | Construct Building to House Liquid Chlorine Tank | Kren/Chew | J. | 29-Nov-95 |
| 390 | 13 | 96-010 | | Battery Dynamite -Rehabilitation and Reuse by NPS | Amos | J. | 15-Nov-95 |
| 389 | 12 | | | Building 1750 - Planting Plan | Sacks | | 29-Nov-95 |
| 388 | 11 | | | New Construction - Golf Course Pumphouse | Golem/Hadley | | 29-Nov-95 |
| 387 | 10 | 96-009 | | Building 661 - Cavalry Stables Site Plan | Sacks | P. | 29-Nov-95 |
| 386 | 9 | 96-008 | | Building 385 - Building Renovation for FMC Exhibit | Kren | J. | |
| 385 | 8 | 96-007 | | Presidiowide Traffic Counter Device Installation | Prokop | S. | |
| 384 | 7 | 96-006 | | Presidio Cellular Sites | Golem | R. | |
| 383 | 6 | 96-005 | | Lyon Street - Chainlink Fence Removal | Scheuman | J. | |
| 382 | 5 | | | Lead Contaminated Soil Around 200-300 Historic Buildings | Jarrat | | 18-Oct-95 |
| 381 | 4 | 96-004 | | Golden Gate Bridge District - Security Camera Installation | Clemon | A. | 18-Oct-95 |
| 380 | 3 | 96-003 | | Primary Electric Distribution System - Phase 1 - I | Swanson | C. | 18-Oct-95 |
| 379 | 2 | 96-002 | | Presidio Golf Course Irrigation System | | | 18-Oct-95 |
| 378 | 1 | 96-001 | | Golf Course Temporary Clubhouse Facilities | Golem | R. | |
| 377 | 147 | 95-134 | | Golf Course Concessioner Entrance Sign | | | 23-Aug-95 |
| 376 | 146 | 95-133 | | Controlled Training Burns at Crissy Field | Spencer | H | 20-Sep-95 |
| 375 | 145 | | | Golf Course Update on Environmental Assessment for New Facilities | | | 03-Oct-95 |
| 374 | 144 | 95-132 | | Fort Point - Installation of Fire and Burglar Alarm | Long | T | 03-Oct-95 |
| 373 | 143 | 95-131 | | Establish Recycling Program | Vincent | A | 03-Oct-95 |
| 372 | 142 | 95-130 | | Building 1310 - Remove and Replace Improperly Sited Trees | Mattos/Hansen | B | |
| 371 | 141 | 95-129 | | Tree Topping by Neighbor | Mattos/Weeks | B | |

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|-----|-----|--------|--|--|-----------|---|-----------|
| 370 | 140 | 95-128 | | Thin Vegetation Behind Fort Mason Officer's Club | Reischl | P | |
| 369 | 139 | 95-127 | | Waldo Tunnel Cell Site - Vegetative Screening | Mattos | B | |
| 368 | 138 | 95-126 | | Bldgs. 101, 102, 103 - Irrigation system Installation | Crone | K | |
| 367 | 137 | 95-125 | | Building 1216 - Construct Access Ramp/Stoops | Kren | J | |
| 366 | 136 | 95-124 | | Building 93 - Preoccupancy Improvements | Fleming | R | |
| 365 | 135 | | | Wetland Feasibility Study - 100% Submittal | Vore | | 20-Sep-95 |
| 364 | 134 | | | Tour Bus Travel Issues on Presidio | Hornor | | 20-Sep-95 |
| 363 | 133 | | | Irrigation System Plan - 100% Submittal | Crone | | 20-Sep-95 |
| 362 | 132 | 95-123 | | Designating Arguello Blvd. Parking Lot - "No Commuter Parking" | Golem | R | 05-Sep-95 |
| 361 | 131 | 95-122 | | Tree Removal at Inspiration Point | Mattos | B | 05-Sep-95 |
| 360 | 130 | 95-121 | | Cavalry Stables - Construct Corral Access Road | Sacks | P | |
| 359 | 129 | 95-120 | | Building 1827 - Demolition | | | |
| 358 | 128 | 95-119 | | MUNI Bus Route - Temporary Re-route | Sacks | P | |
| 357 | 127 | 95-118 | | Additional Contractor Storage Space Request | Clemons | A | |
| 356 | 126 | | | Lobos Creek Dune Restoration Plan Summary of Staff Comments | Cannon | | 23-Aug-95 |
| 355 | 125 | 95-117 | | Golf Course Temporary Facilities Siting | Golem | R | 08-Aug-95 |
| 354 | 124 | 95-116 | | Building 1216 - S.F. Fire Dept Emergency Vehicle Parking | Kren | J | |
| 353 | 123 | 95-115 | | Building 386 - Tenant Improvements | Kren | J | |
| 352 | 122 | 95-114 | | Building 386 - Seismic Retrofit | Kren | J | |
| 351 | 121 | 95-113 | | Fuel Storage Guillory | | | |
| 350 | 120 | 95-112 | | Lobos Creek Dune Restoration Plan | Cannon | J | |
| 349 | 119 | 95-111 | | S.F. Symphony Concert | Hood | A | |
| 348 | 118 | 95-110 | | Non-native Tree Removal on Lobos Creek Dunes | | | |
| 347 | 117 | 95-109 | | Call Box Installation | Short | B | |
| 346 | 116 | 95-108 | | New Generator Building -Curb Alignment | Swanson | C | |
| 345 | 115 | 95-107 | | Under/Above Ground Storage Tank Removal | Jarrat | D | 26-Jul-95 |
| 344 | 114 | 95-106 | | Underground Fuel Distribution System - Removal/Abatement | Jarrat | D | 26-Jul-95 |
| 343 | 113 | 95-105 | | Golden Gate Bridge District - Trailer Siting | Hadley | R | |
| 342 | 112 | 95-104 | | Old Coast Guard Station Building - Irrigation System | Vogel | B | |
| 341 | 111 | 95-103 | | Building 1186 - Exploratorium Storage Space | Cirese | B | |
| 340 | 110 | 95-102 | | Bldgs 940, 654, 920 - Sanitary Lift Station | Swanson | C | |
| 339 | 109 | | | Primary Electrical Distribution System Update | Swanson | | 28-Jun-95 |
| 338 | 108 | 95-101 | | Pershing Square - Irrigation System Installation | Crone | K | 28-Jun-95 |
| 337 | 107 | 95-100 | | Lombard Gate- Irrigation System Installation | Crone | K | 28-Jun-95 |
| 336 | 106 | 95-099 | | Presidio Army Museum - Irrigation System Installation | Crone | K | 28-Jun-95 |
| 335 | 105 | 95-098 | | Vegetation Removal to Facilitate Foundation Repair | Florence | H | |
| 334 | 104 | 95-097 | | Training site for Presidio/SF Fire Departments | Spencer | H | |
| 333 | 103 | 95-096 | | Remove/Repair Condensate Steam Line | Chan | E | |
| 332 | 102 | 95-095 | | Installation of Informational Bulletin Board - South District | Gregorio | A | |
| 331 | 101 | 95-094 | | Building 1216 - Rehabilitation | Kren | J | |
| 330 | 100 | 95-093 | | Fort Point Brick Work Staging/Repair | Rodgers | | |
| 329 | 99 | 95-092 | | Tree Removal at Bowling Alley | Perera | A | |
| 328 | 98 | 95-091 | | GTE Antenna and Trailer Installation - Skyline College | Eddy | S | 13-Jun-95 |
| 327 | 97 | 95-090 | | Burger King Landscaping | Hentschel | R | |
| 326 | 96 | 95-089 | | Building 68 - Installation of Generator Set & Transfer Switch | Rodgers | | |
| 325 | 95 | 95-088 | | Underground Fuel Distribution System - Soil Testing | Jarrat | D | |
| 324 | 94 | 95-087 | | Building 1285 - Contractor Use | Ilejay | E | |
| 323 | 93 | 95-086 | | Lobos Creek Dune Restoration - Sand Storage | Cannon | J | 03-May-95 |

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|-----|----|--------|--|--|--------------|---|-----------|
| 322 | 92 | 95-085 | | Establish Recycling Program | Vincent | A | |
| 321 | 91 | 95-084 | | Water Treatment Plant - Location of Temporary Fencing | Proctor | | |
| 320 | 90 | 95-083 | | Firing Range - Contamination Testing | Blank | R | |
| 319 | 89 | 95-082 | | Building 1028 - International Work Camp | MacDonald | J | |
| 318 | 88 | 95-081 | | Building 97 -Landscape Maintenance/Handicapped Access | Florence | H | |
| 317 | 87 | | | Presidio Swimming Pool & Gym Facilities Prospectus | Golem | | 03-May-95 |
| 316 | 86 | 95-080 | | Division of Maintenance - Interim Use of Crissy Field Building | Scheumann | J | 03-May-95 |
| 315 | 85 | 95-079 | | Presidiowide - Road Restriping | Ramos | R | |
| 314 | 84 | 95-078 | | Building 1110 - Soil Samplings | Blank | R | |
| 313 | 83 | 95-077 | | Golden Gate/Presidio Footrace | Hood | A | |
| 312 | 82 | 95-076 | | Building 99 - Post Theater - Tree Removal | Sacks | P | |
| 311 | 81 | 95-075 | | LAIR Soil Borings | Blank | R | |
| 310 | 80 | 95-074 | | Buildings 11A/B, 13B, 51 and 1103A - Temp Quarters | Keller | B | |
| 309 | 79 | 95-073 | | Bay Area Ridge Trail - Cemetery Overlook | Bouillette | P | 05-Apr-95 |
| 308 | 78 | 95-072 | | Building 989 - (Ft. Point Administration Bldg.) Renovation | Wallace | R | 05-Apr-95 |
| 307 | 77 | 95-071 | | Emergency Grading Along West Pacific Avenue | Ramos | R | |
| 306 | 76 | 95-070 | | Earth Day Activities | Farrell | S | |
| 305 | 75 | 95-069 | | LAIR - Boiler Removal | Feierabend | C | 05-Apr-95 |
| 304 | 74 | 95-068 | | Inspiration Point - Emergency Fence Installation | Farrell | S | 05-Apr-95 |
| 303 | 73 | | | Buiding Demolition Update | Swanson | | 05-Apr-95 |
| 302 | 72 | | | Thermal Description Unit Update | Hadley/Blank | | 05-Apr-95 |
| 301 | 71 | | | Caltrans Presidio Viaduct Seismic Retrofit Update | Hadley | | 05-Apr-95 |
| 300 | 70 | | | Mountain Lake Shoreline Stabilization / Landscaping | Hornor | | 05-Apr-95 |
| 299 | 69 | 95-067 | | March for Parks-Earth Day Activities | Quintero | A | |
| 298 | 68 | 95-066 | | Building 2 (Presidio Museum) - Office Rehabilitation | Martini | J | |
| 297 | 67 | 95-065 | | Golden Gate Bridge District - Soil Borings | Hadley | R | |
| 296 | 66 | 95-064 | | Dolphin Club - South End Runners "Walt's Run" | Hood | A | |
| 295 | 65 | 95-063 | | "Skate to the Gate" Special Event | MacDonald | J | |
| 294 | 64 | 95-062 | | Building 269 - Investigation and Removal of Underground Storage Tank | Jarrat | D | |
| 293 | 63 | 95-061 | | Building 420 - Fence Installation for K-9 Unit | Brouillette | D | |
| 292 | 62 | 95-060 | | Storage Tank Removal Inside Historic Buildings | Jarrat | D | |
| 291 | 61 | 95-059 | | Non-Native Tree Removal At Lobos Creek Lessingia Site | Farrell | S | |
| 290 | 60 | 95-058 | | Pine Limbing Along Lobos Creek | | | |
| 289 | 59 | 95-057 | | Building 637 - B- Zone Investigation | Blank | R | |
| 288 | 58 | 95-056 | | Sign Installation - Presidiowide - Critical Road Intersection | Brouillette | P | |
| 287 | 57 | 95-055 | | Cavalry Stables Site POlan -Soil Test Pits | Sacks | P | |
| 286 | 56 | 95-054 | | Sign Installation - "No Commercial Vehicles" - Presidio Entrance | Sherman | J | |
| 285 | 55 | 95-053 | | Coast Guard Station - Remove and Replace Hedges | Perera | A | |
| 284 | 54 | 95-052 | | Building 779 - Install Multi - Flow System | Perera | A | |
| 283 | 53 | 95-051 | | Building 99 - Theater Rehabilitation | White | G | |
| 282 | 52 | 95-050 | | Buildings 680 & 1153 - Soil Sampling | Jarrat | D | |
| 281 | 51 | 95-049 | | Temporary Water Tank Placement | Jarrat | D | |
| 280 | 50 | 95-048 | | Building 950 - Soil Borings | Jarrat | D | |
| 279 | 49 | 95-047 | | Buildings 921 & 651 - Additional Underground Storage Tank | Jarrat | D | |
| 278 | 48 | 95-046 | | Building 231 - Additional Soil and Wall Borings | Blank | R | |
| 277 | 47 | 95-045 | | Soil Boring | Jarrat | D | |
| 276 | 46 | 95-044 | | Building 1248 - Repair Garage Wall/Install Retaining Wall | Ramos | R | |

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|-----|-----|--------|--|---|------------|---|-----------|
| 275 | 45 | 95-043 | | Hazard Trees - Removal Class 7 Trees | Mattos | B | |
| 274 | 44 | 95-042 | | Road Intersection Improvements-Soil Test Pits | Sacks | P | |
| 273 | 43 | 95-041 | | Building 135 (Golden Gate Club)-Building Rehabilitation | Wallace | R | 08-Feb-95 |
| 272 | 42 | 95-040 | | Building 101 Rehabilitation | Wallace | R | 08-Feb-95 |
| 271 | 41 | 95-039 | | Thoreau Center for Sustainability - Building Rehab | Wallace | R | 08-Feb-95 |
| 270 | 40 | 95-038 | | Building 387 (Childcare Center) | Fleming | R | |
| 269 | 39 | 95-037 | | Building 637 - Corrective Action Plan | Blank | R | 08-Feb-95 |
| 268 | 38 | 95-036 | | Buildings 202/203 - Building Removal | Hadley | R | 08-Feb-95 |
| 267 | 37 | 95-035 | | CCSF Equipment Access to South End of Baker Beach | Hadley | R | 08-Feb-95 |
| 266 | 36 | 95-034 | | Relocation of Richmond Transport Vent at Land's End Parking | Hadley | R | |
| 265 | 35 | 95-033 | | Building 777F-Hazard Tree Removal | Mattos | B | |
| 264 | 34 | 95-032 | | Underground Storage Tank Removal Inside Historic Structures | Jarrat | D | 08-Feb-95 |
| 263 | 33 | 95-031 | | Lombard Hill Entry Road - Restore Historic Landscape | Perera | A | |
| 262 | 32 | | | Lobos Creek Restoration Plan Workshop Update | | | |
| 261 | 31 | 95-030 | | Building 1576 - Interim Use by Park Volunteers | Farrell | S | |
| 260 | 30 | 95-029 | | Funston Avenue Houses - Soil Borings for Seismic Design | White | G | |
| 259 | 29 | 95-028 | | Building 926 - Crissy Field Warehouse-Interim Use | Kolls | | |
| 258 | 28 | 95-027 | | Presidio Blvd Entrance - Remove/Replace Two Trees at the Entrance of Presidio Boulevard | Mattos | B | |
| 257 | 27 | 95-026 | | Building 1047 - Hydropunch Investigation | Jarrat | D | |
| 256 | 26 | 95-025 | | Building 350 - Golf Course - Construct Generator Building | Kaminski | E | |
| 255 | 25 | 95-024 | | Building 332-Bioventing Study | Jarrat | D | |
| 254 | 24 | 95-023 | | Underground Storage Tanks in Historic Structures-Investigation | Jarrat | D | |
| 253 | 23 | 95-022 | | Building 1261 - Structural Investigation | Kren | J | |
| 252 | 22 | 95-021 | | "First Run" Special Use Permit | Moore/Hood | | |
| 251 | 21 | 95-020 | | Building 1648 - ACOE Temporary Use of Boring | Ferrari | L | |
| 250 | 20 | 95-019 | | Building 983 - Soil Borings | Jarrat | D | |
| 249 | 19 | 95-018 | | Building 1227 - Construction Staging - Electric Meter Installation | Ferrari | L | |
| 248 | 18 | 95-017 | | Building 1504 - Operation of Water Treatment Plant | Chew | S | |
| 247 | 17 | 95-016 | | Building 651 - Underground Storage Tank Remedial Soil Boring | Jarrat | D | |
| 246 | 16 | 95-015 | | Removal of Improperly Sited Vegetation to Facilitate Repair | Mattos | B | |
| 245 | 15 | 95-014 | | FY 95 - Presidio Building Demolition | Swanson | C | 14-Dec-94 |
| 244 | 14 | 95-013 | | Buildings 1237 & 1239 - SF Fire Dept Short Term Use | Cirese | B | |
| 243 | 13 | 95-012 | | Godzilla Film Permit - REQUEST WITHDRAWN | White | W | 14-Dec-94 |
| 242 | 12 | 95-011 | | Building 35 - Tree Removal Adjacent to Water Line | Mattos | B | |
| 241 | 11 | | | Mountain Lake Landscaping Plan - Scoping | Honor | | 23-Nov-94 |
| 240 | 10 | 95-010 | | Building 218 (Fire Station) - Replace Irrigation System | Oravec | S | |
| 239 | 9 | 95-009 | | Clean Soil Sampling | Blank | R | |
| 238 | 8 | 95-008 | | Not Used | | | |
| 237 | 7 | 95-007 | | Building 100 - Control Overgrown Vegetation | Mattos | B | |
| 236 | 6 | 95-006 | | Buildings 667 & 668 - Museum Collection Management Facilities | Nicholson | D | |
| 235 | 5 | 95-005 | | Sanitary Sewer Distribution System - Additional Repair Sites | Stone | A | |
| 234 | 4 | 95-004 | | Install and Replace Transformers | Swanson | C | |
| 233 | 3 | 95-003 | | Tank Replacement Project | Jarrat | D | |
| 232 | 2 | 95-002 | | Mitigate Class 6 & 7 Hazard Trees | Mattos | B | |
| 231 | 1 | 95-001 | | Remedial Investigation of Subsurface Contamination | Blank | R | |
| 230 | 130 | 94-126 | | Public Health Services Hospital Remediation | Jarrat | D | |
| 229 | 129 | 94-125 | | Cellular One - Transmission Facility Installation | Kaminski | E | 26-Oct-94 |

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|-----|-----|--------|--|--|------------|----|-----------|
| 228 | 128 | 94-124 | | "Farmer & Chase" Film Permit - CANCELLED | White | W | |
| 227 | 127 | 94-123 | | Bldgs. 748, 763, and 750 - Additional Underground Storage | Hadley | R | |
| 226 | 126 | 94-122 | | Torpedo Wharf Concession Prospectus | Hentschel | R | 26-Oct-94 |
| 225 | 125 | 94-121 | | FY 95 - Building Demolitions | Swanson | C. | 26-Oct-94 |
| 224 | 124 | 94-120 | | Overnight Accommodations - Pilot's Housing Soil Borings | White | G | |
| 223 | 123 | 94-119 | | Not used | Hadley | R | |
| 222 | 122 | 94-118 | | "Nine Months" Film Permit | White | W | 11-Oct-94 |
| 221 | 121 | 94-117 | | Bldgs. 40, 511, 1233, 1310 - Un-substantiated Tanks | Hadley | R | |
| 220 | 120 | 94-116 | | Bldgs. 8 and 934 - Un-substantiated Tanks | Hadley | R | |
| 219 | 119 | 94-115 | | Additional Lead Sampling for Cal Trans Presidio Viaduct | Hadley | R | |
| 218 | 118 | 94-114 | | National Cemetery | Ozanich | J | 22-Sep-94 |
| 217 | 117 | 94-113 | | Building 1307 - Fuel Line Segment Removal | Hadley | R | |
| 216 | 116 | 94-112 | | Thermal Desorption Unit - Soil Remediation | Blank | R | 28-Sep-94 |
| 215 | 115 | 94-111 | | Building 637 - Soil Bio-remediation | Blank | R | 28-Sep-94 |
| 214 | 114 | 94-110 | | Building 1349 - Storage Tank Investigation and Removal | Blank | R | |
| 213 | 113 | 94-109 | | Building 2 (Presidio Museum) - Museum Collection Storage | Chye | L | |
| 212 | 112 | 94-108 | | Building 332 - Bioremediation System | Jarrat | D | |
| 211 | 111 | 94-107 | | Viacom Cable Television Cable Installation | Hentschel | R | |
| 210 | 110 | 94-106 | | Letterman Parking Lot Test Pits | Jarrat | D | |
| 209 | 109 | 94-105 | | Inspiration Point - Install Emergency Fencing to Protect Rare | Farrell | S | 31-Mar-94 |
| 208 | 108 | 94-104 | | Building 35 - Communications Center - Construct Generator | Stone | A | 31-Aug-94 |
| 207 | 107 | 94-103 | | Contractor Trailer Site | Cirese | B | |
| 206 | 106 | 94-102 | | New Burger King Concession Contract | Golem | R | |
| 205 | 105 | 94-101 | | Install Backup Water Line to Main Reservoir | Stone | A | 31-Aug-94 |
| 204 | 104 | 94-100 | | Investigation of Presidio Fuel Distribution System Project | Jarrat | D | 22-May-95 |
| 203 | 103 | 94-099 | | Landfill #8 (Public Health Service Hospital) - Landfill Remediation | Blank | R | 06-Jul-94 |
| 202 | 102 | 94-098 | | Building 1244 (Presidio Nursery) - Initiate Operation of Nurses | Mattos | B | 30-Nov-94 |
| 201 | 101 | 94-097 | | Secure Battery East and Battery West Powder Magazines | Schultheis | C | |
| 200 | 100 | 94-096 | | LAIR Facility Monitoring Wells | Walters | M | |
| 199 | 99 | 94-095 | | Landfill #10 - Install Monitoring Wells | Hadley | R | 03-Aug-94 |
| 198 | 98 | 94-094 | | Marina Viaduct - Seismic Retrofit | Hadley | R | 27-Jul-94 |
| 197 | 97 | 94-093 | | Presidio Viaduct - Seismic Retrofit and Lead Remediation | Hadley | R | 27-Jul-94 |
| 196 | 96 | 94-092 | | Highway 1 - Seismic Retrofit | Hadley | R | 27-Jul-94 |
| 195 | 95 | 94-091 | | Gorgas Avenue Warehouses - Resurface and Remove Parking Area Behind Gorgas Warehouse in the 1100 Area. | Weber | W | |
| 194 | 94 | | | Continued Use of Bldg. 35 by DIS | | | |
| 193 | 93 | | | Rob Hill Camping Authority | Levitt | | 08-Jun-94 |
| 192 | 92 | 94-090 | | Golden Gate Bridge Seismic Retrofit - Construction Staging | Hornor | N | 14-Jun-94 |
| 191 | 91 | 94-089 | | German Ivy Removal Experiment - Research & Collection and Experiment | Nelson | | |
| 190 | 90 | 94-088 | | Bldgs. 905, 906, 913 and 917 - Crissy Field Barracks - Temp | Phillips | V | |
| 189 | 89 | 94-087 | | Golden Gate Bridge - Toll Plaza Improvements | Hadley | R | 11-May-94 |
| 188 | 88 | 94-086 | | Continued Occupancy of Tenants | Phillips | V | 22-Apr-94 |
| 187 | 87 | 94-085 | | Public Health Service Hospital Lessingia Site | Farrell | S | |
| 186 | 86 | 94-084 | | Stormwater System Repairs - Montgomery Street Area | Stone | A | 11-May-94 |
| 185 | 85 | 94-083 | | Eliminate Flooding and Erosion at Battery Chamberlin | Stone | A | 11-May-94 |
| 184 | 84 | 94-082 | | Redirect Runoff from High Risk Areas to Sanitary Sewer at Loading Dock | Stone | A | 11-May-94 |

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|-----|----|--------|--|--|------------|---|-----------|
| 183 | 83 | 94-081 | | Redirect Runoff from Cavalry Stables to Sanitary Sewer | Stone | A | 11-May-94 |
| 182 | 82 | 94-080 | | Repair Drainage at Battery East and Environs | Stone | A | 11-May-94 |
| 181 | 81 | | | Secondary Electric System Repairs & Metering | Heinrich | | 11-May-94 |
| 180 | 80 | 94-079 | | Building 1750 - Redirect Storm and Sanitary Sewer to Richmond | Stone | A | 11-May-94 |
| 179 | 79 | 94-078 | | Building 102 - Rear Delivery Truck Driveway - CANCELLED | Ozanich | J | |
| 178 | 78 | 94-077 | | Stormdrain Stenciling - Presidiowide | Vore | D | 22-Apr-94 |
| 177 | 77 | 94-076 | | Raven's Manzanita Restoration Plan | Farrell | S | 13-Apr-94 |
| 176 | 76 | 94-075 | | West Pacific Avenue Repaving | Hadley | R | 19-Sep-94 |
| 175 | 75 | 94-074 | | Baker Beach - Hazard Tree Removal | Mattos | B | |
| 174 | 74 | 94-073 | | Building 102 - Basement Ventilation Fan | Kahane | H | |
| 173 | 73 | 94-072 | | Fort Point - Paint Walkway & Conduit - March for Parks | Schultheis | C | |
| 172 | 72 | 94-071 | | Building 971 - Stabilize Pump House - March for Parks | Schultheis | C | |
| 171 | 71 | 94-070 | | Battery East Trail Maintenance - March for Parks | Schultheis | C | |
| 170 | 70 | 94-069 | | Installation of Cellular Phone Call Boxes - Removal of Fire Prevention | Long | T | |
| 169 | 69 | 94-068 | | Crissy Field Drumming Event - Special Use Permit | Strand | | |
| 168 | 68 | 94-067 | | Natural Gas Fueling Station - Temporary Location | Foster | M | 20-Mar-94 |
| 167 | 67 | 94-066 | | Installation of Fiber Optics System | Short | B | 24-Feb-94 |
| 166 | 66 | 94-065 | | Building 643 - Install Chainlink Fence | Bordessa | J | |
| 165 | 65 | | | Mountain Lake Park Landscaping and Shoreline Stabilization Plan | Weeks | | 13-Apr-94 |
| 164 | 64 | 94-064 | | Letterman Hospital Parking Lot - Prune & Remove Trees | Mattos | B | |
| 163 | 63 | 94-063 | | Mountain Lake Park Shoreline Improvements | Clemons | A | 24-Feb-94 |
| 162 | 62 | 94-062 | | Stump Grinding - Presidiowide | Bordessa | J | |
| 161 | 61 | 94-061 | | Montgomery Street - Removal of Hazardous Trees | Mattos | B | |
| 160 | 60 | 94-060 | | Building 35 - Public Safety Center | Giller | | 02-Feb-94 |
| 159 | 59 | 94-059 | | Tree Removal for Infrastructure Repairs | Mattos | B | |
| 158 | 58 | 94-058 | | Emergency Riprap Repair - Crissy Field | Bordessa | J | |
| 157 | 57 | 94-057 | | Bowley Street Redesign to Accommodate Baker Beach Overflow | Hadley | R | 24-Feb-94 |
| 156 | 56 | 94-056 | | Restoration Plans for Threatened & Endangered Plants | Farrell | S | 24-Feb-94 |
| 155 | 55 | 94-055 | | Building 102 - Elevator Plumb Line | Wallace | R | 03-Feb-94 |
| 154 | 54 | 94-054 | | Presidio Water Reservoir - Seismic Retrofit/Repair | Stone | A | |
| 153 | 53 | 94-053 | | Golf Course Concessions Contract | Golem | R | 19-Jan-94 |
| 152 | 52 | 94-052 | | Tree Trimming Contract Modifications | Mattos | B | |
| 151 | 51 | 94-051 | | Golf Course Path - Paving Contract Modification | | | |
| 150 | 50 | 94-050 | | Building 1163 & 1167 - Reroofing | Weber | W | 04-Feb-94 |
| 149 | 49 | 94-049 | | Julius Kahn Playground - Emergency Plant Protection Fencing | Nelson | | |
| 148 | 48 | 94-048 | | Quarry Road Erosion Control - Revegetation Plan | Vore | D | |
| 147 | 47 | 94-047 | | Golden Gate Bridge District - Seismic Instrument Site | Honor | N | |
| 146 | 46 | 94-046 | | Water - Treatment Plant - Foundation Excavation | Stone | A | |
| 145 | 45 | 94-045 | | Stormwater Management Plan - Crissy Field Groundwater T | Stone | A | |
| 144 | 44 | 94-044 | | Fort Scott Reservoir - Safety/Stabilization Design | Stone | A | |
| 143 | 43 | 94-043 | | Army Headquarters Parking and Landscape Plan | McKean | | |
| 142 | 42 | 94-042 | | Fort Point Sewer/Water Distribution System Repairs | Stone | A | |
| 141 | 41 | 94-041 | | Building 2 (Presidio Museum) - Reroofing | Weber | W | |
| 140 | 40 | 94-040 | | Presidio Boiler Plant - Operation, Maintenance, Repair Contract | Chew | S | |
| 139 | 39 | 94-039 | | Design Reclaimed Water Project | Stone | A | |
| 138 | 38 | 94-038 | | Irrigation System Repair - Presidiowide | Swanson | C | 19-Jan-94 |

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|-----|----|--------|--|--|---------------|-----|-----------|
| 137 | 37 | 94-037 | | Indefinite Quantities Contract - General Maintenance Repair East Fencing Ft Point | Lan | C | |
| 136 | 36 | 94-036 | | Buildings 558 & 559 - Global Restoration Fair | Phillips | V | 18-Nov-93 |
| 135 | 35 | 94-035 | | Battery East/Bldg 989 - Trail Repairs | Healy | B | 08-Feb-93 |
| 134 | 34 | 94-034 | | Building 663 (Cavalry Stables) - Storage of Roofing Supplies | Amos | J | |
| 133 | 33 | 94-033 | | Building 661 (Cavalry Stables) - U>S> Park Police Use | Amos | J | |
| 132 | 32 | 94-032 | | National Cemetery - Vegetation Clearing Along Western Side | Whitt | J | |
| 131 | 31 | 94-031 | | Building 102 - Bicycle Rack Installation | Ozanich | J | |
| 130 | 30 | 94-030 | | Building 1163 & 1167 - Use as NPS Warehouses | Ozanich | J | |
| 129 | 29 | 94-029 | | Mountain Lake Aquatic Study | Hatch | D | 21-Jul-93 |
| 128 | 28 | 94-028 | | Integrated Pest Management Plan (Presidio) | Hatch | D | 31-Mar-93 |
| 127 | 27 | 94-027 | | Golden Gate Bridge District - Vegetation/Vista Clearing | Healy | B | |
| 126 | 26 | 94-026 | | Building 2 (Presidio Museum) - Sign Design | Nicholson | D | |
| 125 | 25 | 94-025 | | Stormwater Management Plan and System Repairs | Swanson | C | |
| 124 | 24 | 94-024 | | Lobos Creek Watershed Sanitary Survey | Swanson | C | |
| 123 | 23 | 94-023 | | Primary Electrical Distribution System Repairs | Swanson | C | |
| 122 | 22 | 94-022 | | Building 1750 - Park Maintenance Facility | Kilpatrick | | |
| 121 | 21 | 94-021 | | Golden Gate Bridge - Seismic Retrofit | Hornor/Hadley | N/R | |
| 120 | 20 | 94-020 | | Golden Gate Bridge - Lead Clean-up | Hornor/Hadley | N/R | |
| 119 | 19 | 94-019 | | Inspiration Point Management Plan | Nelson | | |
| 118 | 18 | 94-018 | | Building 643 - NPS Maintenance Interim Use | Kilpatrick | | |
| 117 | 17 | 94-017 | | Building 1217 - Park Safety Operations Interim Use | Tomasovic | J | |
| 116 | 16 | 94-016 | | Interim Landscape Maintenance SOP | Kilpatrick | | |
| 115 | 15 | 94-015 | | Presidio Wayside Exhibit Design | Weideman | R | |
| 114 | 14 | 94-014 | | Forest Management Plan | Mattos | B | |
| 113 | 13 | 94-013 | | Crissy Field Wetland Restoration Plan | Thomas | T | |
| 112 | 12 | 94-012 | | Fencing - Indefinite Quantities Contract | Weber | W | |
| 111 | 11 | 94-011 | | Paving - Indefinite Quantities Contract | Weber | W | |
| 110 | 10 | 94-010 | | Exterior Paving - Indefinite Quantities Contract | Weber | W | |
| 109 | 9 | 94-009 | | Interior Partitions - Indefinite Quantities Contract | Weber | W | |
| 108 | 8 | 94-008 | | Carpeting - Indefinite Quantities Contract | Weber | W | |
| 107 | 7 | 94-007 | | Roofing-Indefinite Quantities Contract | Weber | W | |
| 106 | 6 | 94-006 | | Electrical Distribution System Design | Swanson | C | |
| 105 | 5 | 94-005 | | FY 94-Building Demolitions | Weber | W | |
| 104 | 4 | 94-004 | | Lobos Creek Restoration and Infiltration Gallery Plan | Vore | D | |
| 103 | 3 | 94-003 | | Presidio Stone Boundary Wall Repair | Chew | S | |
| 102 | 2 | 94-002 | | Water Treatment Plant-Final Design | DSC | | |
| 101 | 1 | 94-001 | | Water Distribution System Repairs | Stone | A | |

| Adm Date | Notes |
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| | |
| | approved |
| | approved |
| | approved |
| | on hold |
| | project approved |
| 23-Jun-04 | project approved |
| | Old Business |
| | project approved |
| 13-Apr-04 | project approved |
| 13-Apr-04 | project approved |
| 07-Apr-04 | project approved |
| 15-Mar-04 | Project Cancelled - filed in cancelled file drawer |

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| | project approved |
| | project approved |
| | project approved |
| | not approved, Laura to write letter |
| | project approved |
| 21-Jan-04 | Project approved |
| | Project approved |
| | project approved |
| 10-Oct-03 | Project approved |
| | Scoping |
| | |
| 05-Sep-03 | Project approved |
| | Scoping |
| | Project must return to Project Review |
| | Project approved |
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| | |
| | Project approved |
| | Project approved with conditions |
| | Project approved with conditions |
| 05-May-03 | Project circulating |

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| 18-Apr-03 | Project approved with conditions |
| 18-Apr-03 | Project approved with conditions |
| 17-Apr-03 | Project approved with conditions |
| | Project approved with conditions |
| | Project approved with conditions |
| 02-Apr-03 | Project Approved with conditions |
| 14-Mar-03 | Project Approved with conditions |
| 25-Feb-03 | Project Approved with conditions |
| | Information |
| | Project will come back to Project Review |
| | Project approved with conditions |
| 05-Feb-02 | Project Approved with conditions |
| | Trust Project Review. Did not go through NPS project |
| | Project Approved with conditions |
| | Project on hold |
| | Needs to return to Project Review |
| | Project Approved with conditions |
| 21-Oct-02 | Project Approved with conditions |
| 17-Oct-02 | Cancelled!! |
| | Approved |
| 20-Aug-02 | Approved |
| | Approved |

| | |
|-----------|---|
| 20-Aug-02 | Approved |
| 09-Aug-02 | Approved |
| 18-Aug-02 | Approved |
| | |
| | Will return to project review after recommendations |
| | Scoping |
| | There is no project review form. This project as |
| 21-Jun-02 | Approved with conditions |
| | Approved with conditions |
| | Approved with conditions |
| 18-Jun-02 | Approved with conditions |
| | On-hold |
| 06-Jun-02 | Approved with conditions |
| | meeting and presented at the July 3, 2002 meeting |
| | Approved with conditions |
| 24-May-02 | approved with conditions |
| 22-Apr-02 | |
| 22-Apr-02 | Approved with conditions |
| | Approved with conditions |
| | Approved with conditions |
| | Approved with conditions |
| 01-Apr-02 | Approved with conditions |
| | Approved with conditions |
| | Cancelled from Full Project |
| 28-Jan-02 | Approved |
| 14-Jan-02 | Approved with Conditions |
| | |
| | |
| | Project Recommendations, |

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|-----------|--|
| | Scoping - Project |
| | Approved with Conditions & |
| | Approved with Conditions |
| | Approved with Conditions |
| | Information |
| | See PR01-039 |
| | Approved with Conditions |
| | Approved with Conditions |
| 20-Aug-01 | Not Approved |
| | Approved with conditions |
| | Approved with conditions |
| | Scoping |
| 06-Aug-01 | Approved |
| 27-Jul-01 | Filed (Reviewed through |
| 26-Jul-01 | Approved with conditions |
| 16-Jul-01 | Approved with conditions |
| | Information |
| | Scoping (Moved from Fiscal Year 2000, see project PR |
| | Old Business (Moved from Fiscal Year 2000, see project PR00-101) |
| 05-Jun-01 | Approved with conditions |
| | |
| 04-Jun-01 | Approved with conditions |
| | Scoping |
| | Approved with conditions |
| | Approved with conditions |
| | Approved with conditions |
| 05-Apr-01 | Approved with conditions |
| 04-Apr-01 | Approved with conditions |
| 28-Mar-01 | Approved w/ conditions |
| | Approved w/ conditions |
| | Information |
| | Approved w/ conditions |
| 26-Feb-01 | Approved w/ conditions |
| | Approved w/ conditions |
| 12-Feb-01 | Approved w/ conditions |
| 26-Jan-01 | Approved, Emergency |
| 25-Jan-01 | Approved with conditions |
| | Approved w/ conditions |
| | Approved w/ conditions |
| | Approved w/ conditions |
| | Information |
| 14-Nov-00 | Approved with conditions |
| | Approved w/ conditions |
| 30-Oct-00 | Approved w/ conditions |
| 30-Oct-00 | Approved w/ conditions |

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| | Scoping |
| | Approved w/ conditions |
| | Scoping 2 |
| | Scoping 1 |
| 05-Oct-00 | Turned over to the Trust for |
| 02-Oct-00 | Turned over to the Trust for |
| | Withdrawn by Devon Danz |
| | Approved with |
| 13-Jan-00 | Approved w/conditions; amended 3/2/00 (Moved from Fiscal Year 1999, see PR 99-076) |
| | Approved with Conditions (Moved from Fiscal Year 1999, see project PR 99- 095) |
| | Approved w/ conditions |
| 14-Sep-00 | Turned over to the Trust for |
| 12-Sep-00 | Approved with conditions |
| | Approved w/ conditions |
| 23-Aug-00 | Approved w/ conditions |
| 23-Aug-00 | Approved w/ conditions |
| 18-Aug-00 | Approved w/ conditions |
| 15-Aug-00 | Approved w/ conditions |
| | Approved w/ conditions/see also 01-012 |
| | Approved w/ conditions |
| | Project will be discussed at 17 Jan 01 PR mtg (See PR01-032) |
| 08-Aug-00 | Project originally listed on Parkwide Database by mistake |
| 07-Aug-00 | Approved w/ conditions |
| 03-Aug-00 | Project withdrawn by the Proj |
| | Scoping (See PR 01-033) |
| | Approved w/ conditions |
| 20-Jul-00 | Project disapproved, the proje |
| 20-Jul-00 | Approved w/ conditions |
| 17-Jul-00 | Trust Historical Landscape A |
| | Approved w/ conditions |
| | Presentation postponed to 27-Sep-00 |
| | Recommend disapproval, the |

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| | Project approved through a le |
| 11-Jul-00 | Approved w/ conditions |
| | Scoping |
| 12-Jul-00 | Approved w/ conditions |
| | Scoping |
| | Project will return as Old Business |
| 17-Jun-00 | Approved w/ conditions |
| | Scoping |
| 27-Jun-00 | Approved w/ conditions |
| 08-Jun-00 | Approved w/ conditions |
| | Information |
| | Approved w/ conditions |
| | Scoping |
| 25-May-00 | Approved w/ conditions |
| 18-May-00 | Approved w/ conditions |
| | Approved w/ conditions |
| 16-May-00 | Approved w/ conditions |
| 09-May-00 | Approved w/ conditions |
| 09-May-00 | Project circulating |
| 26-May-00 | Project circulating |
| | continuation of 99-088 |
| 08-May-00 | Approved w/ conditions |
| 03-May-00 | Approved w/ conditions |
| | Trust withdrew the proposal f |
| | Project cancelled |
| | Approved w/ conditions |
| 01-May-00 | Approved w/ conditions |
| 25-Apr-00 | Approved w/ conditions |
| | |
| | Approved w/ conditions |
| | Approved w/ conditions |
| 18-Apr-00 | Approved w/ conditions |
| | Approved w/ conditions |
| | |
| 13-Apr-00 | Approved w/ conditions |
| | Approved w/ conditions |
| 06-Apr-00 | Approved w/ conditions |
| 05-Apr-00 | Approved w/ conditions |

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|-----------|------------------------------------|
| | Approved w/ conditions |
| 06-Apr-00 | Project disapproved |
| 04-Apr-00 | Project cancelled |
| | Approved w/ conditions |
| 04-Apr-00 | Approved w/ conditions |
| 30-Mar-00 | Approved w/ conditions |
| 27-Mar-00 | Approved w/ conditions |
| 27-Mar-00 | Approved w/ conditions |
| 22-Mar-00 | Project withdrawn by the Proj |
| 22-Mar-00 | Approved w/ conditions |
| | Approved w/ conditions |
| 21-Mar-00 | Approved w/ conditions |
| 14-Mar-00 | Approved w/o conditions |
| 03-Mar-00 | Approved w/ conditions |
| 02-Mar-00 | Approved w/ conditions |
| | Approved w/ conditions |
| | Approved w/ conditions |
| | Scoping |
| | Scoping |
| | Scoping |
| 24-Feb-00 | Approved w/ conditions |
| 01-Mar-00 | Approved w/ conditions |
| | |
| 03-May-00 | Approved w/ conditions |
| | Approved w/ conditions |
| | Approved w/ conditions |
| | Complied |
| | Approved w/ conditions |
| 08-Feb-00 | Approved w/ conditions |
| 08-Feb-00 | Approved |
| | Project on hold by Project Manager |
| 07-Feb-00 | Approved w/ conditions |
| 31-Jan-00 | Approved w/o conditions |
| | |
| 27-Jan-00 | Approved w/ conditions |
| 27-Jan-00 | Approved w/ conditions |
| 26-Jan-00 | Approved w/ conditions |

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| | Approved w/ conditions |
| | Committee recommended co |
| 06-Jan-00 | Approved w/ conditions |
| | Project was removed from the agenda |
| | Approved w/ conditions |
| 18-Jan-00 | Approved |
| 18-Jan-00 | Approved |
| 03-Jan-00 | Approved w/ conditions |
| | |
| 26-Jan-00 | Approved w/ conditions |
| 22-Dec-99 | Approved w/ conditions |
| 21-Dec-99 | Approved w/ conditions |
| 09-Dec-99 | Approved w/ conditions |
| 06-Dec-99 | Project withdrawn by the Project Manager |
| 02-Dec-99 | Approved w/ conditions |
| | The Superintendent needs to review the test path issue in detail before any decision is made to remove the path |
| | Approved w/ conditions |
| 12-Nov-99 | Approved w/ conditions |
| 18-Nov-99 | Approved w/ conditions |
| 11-Nov-99 | Verbal Approval on Emergency Repair |
| 08-Nov-99 | Approved w/ conditions |
| 05-Nov-99 | Approved w/ conditions |
| | Approved w/ conditions |
| | Approved w/ conditions |
| 09-Nov-99 | Approved w/ conditions |
| 29-Oct-99 | Approved w/ conditions |
| | Project will come back as New Business |
| 13-Oct-99 | Approved w/ conditions |
| 27-Sep-99 | Alt. 1 Approved with conditions |
| 23-Sep-99 | Approved w/ conditions |
| 23-Sep-99 | Approved w/ conditions |
| 23-Sep-99 | Approved w/ conditions |

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|-----------|---|
| 23-Sep-99 | Approved w/ conditions/file missing |
| | |
| 20-Sep-99 | Project Manager |
| | never resolved |
| 10-Sep-99 | Approved w/ conditions |
| | Approved w/ conditions |
| 27-Aug-99 | Approved w/o conditions |
| 24-Aug-99 | Disapproved |
| | Scoping |
| | |
| 24-Aug-99 | Approved w/ conditions |
| 20-Aug-99 | Site Selection (See PR 00-111) |
| | |
| | Scoping |
| | |
| 10-Aug-99 | Project circulating (8/10/99) |
| 29-Jul-99 | Approved w/ conditions |
| | Approved w/ conditions |
| | Scoping |
| | |
| | |
| 20-Jul-99 | Approved w/ conditions |
| | |
| 02-Jul-99 | Approved w/ conditions |
| | |
| 30-Jun-99 | Approved w/conditions |
| 30-Jun-99 | Approved w/conditions |
| | |
| 14-Dec-00 | Approved w/conditions |
| | |
| | |
| 29-Jun-99 | Approved w/conditions |
| | Preliminary approval w/conditions, needs project review |
| 03-May-00 | |
| | Scoping |
| 14-Jun-99 | Approved w/conditions |
| 14-Jun-99 | Approved w/conditions |
| 08-Jun-99 | Approved w/conditions |
| 04-Jun-99 | Approved w/conditions |

| | Information (See PR 00-112) |
|-----------|---|
| 25-May-99 | Approved w/ conditions |
| | Geotechnical investigation approved/Underground |
| 12-May-99 | Approved w/ conditions |
| 12-May-99 | Approved w/ conditions |
| | Approved pending completion of conditions |
| | |
| | Return as Old Business (listed as PR-038.98 in |
| 24-Aug-99 | |
| | Improvements to structure were approved as PR-99- |
| | Approved w/o conditions |
| 29-Apr-99 | Approved w/conditions |
| | Approved w/ conditions |
| 26-Apr-99 | Approved w/conditions |
| | Project cancelled due to safety issues |
| 20-Apr-99 | Approved w/conditions |
| 15-Apr-99 | Approved w/conditions |
| 26-Apr-99 | Approved w/conditions |
| 14-Apr-99 | Approved w/ conditions |
| | Approved w/conditions |
| 20-Apr-99 | Approved w/conditions |
| 19-Apr-99 | Approved w/conditions |
| 20-Apr-99 | Parkwide project PW 99-037 file moved to Ft Mason |
| 05-Apr-99 | Approved w/ conditions |
| | Approved w/conditions |
| 05-Apr-99 | Disapproved |
| 31-Mar-99 | Approved w/conditions |
| | Approved w/conditions |
| | Cat. Ex. W/conditions |
| | Approved w/conditions |
| | Proj will return as new business |
| 24-Mar-99 | Approved w/conditions |
| | Approved w/ conditions |
| 10-Mar-99 | Approved w/ conditions |
| 02-Mar-99 | Approved w/conditions |
| | Approved w/ conditions |
| | Approved w/conditions |
| 24-Feb-99 | Approved w/ conditions |

| | |
|-----------|---|
| 11-Mar-99 | Approved w/ conditions |
| 11-Mar-99 | Approved w/ conditions |
| 11-Mar-99 | approved w/o conditions |
| | Approved w/ conditions |
| 11-Feb-99 | Project circulating |
| | Approved w/ conditions |
| | Approved w/ conditions |
| | Scoping |
| | Approved w/ conditions |
| | Approved w/ conditions |
| 03-Feb-99 | Approved w/ conditions |
| 09-Feb-99 | Approved w/ conditions |
| 11-Feb-99 | Tree cut prior to completion of Proj Review |
| 04-Feb-99 | approved w/o conditions |
| 08-Feb-99 | approved w/o conditions |
| 22-Feb-99 | Approved w/ conditions |
| 04-Feb-99 | Approved w/ conditions |
| 04-Feb-99 | Approved w/ conditions |
| | Approved w/ conditions |
| | New Business |
| | Scoping |
| | Scoping-Coming back as new business |
| | Scoping-cancelled |
| | Site disapproved by the Presidio Comm |
| | Scoping |
| 04-Feb-99 | Approved w/ conditions |
| | Approved w/ conditions |
| 25-Jan-99 | Approved w/ conditions |
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United States Department of the Interior

NATIONAL PARK SERVICE

GOLDEN GATE NATIONAL RECREATION AREA
FORT MASON, SAN FRANCISCO, CALIFORNIA 94123

IN REPLY REFER TO:

D18 (GOGA-SUPT)

FEB 25 2013

Craig Middleton
Executive Director
Presidio Trust
103 Montgomery Street
P.O. Box 29052
San Francisco, CA 94129

Dear Mr. Middleton,

Golden Gate National Recreation Area has reviewed the Presidio Trust's proposed regulation on commercial dog walking in Area B of the Presidio. We understand that the Presidio Trust is taking this action in response to San Francisco's commercial dog walking ordinance, passed last year by the San Francisco Board of Supervisors, which will require a permit for four to eight dogs, liability insurance and training. We share the Trust's concern that without protective action by the Presidio Trust, commercial dog walkers may relocate to Trust lands where commercial dog walking is currently not regulated. This potential redistribution could impact the Presidio Trust's mandate to preserve and protect the park's resources.

However, while we support the Presidio Trust's effort to manage this special use, because we share a boundary with the lands managed by the Presidio Trust, we urge the Trust to adopt a maximum limit of six dogs per dog walker, consistent with the limits specified in the alternatives that permit commercial dog walking in Golden Gate National Recreation Area's draft Dog Management Plan/EIS.

As you know, the park is actively developing a draft Dog Management Plan/EIS (Plan/EIS). That document includes a range of alternatives that address commercial dog walking - from setting a limit of three dogs, to a limit of six dogs with a permit required, to prohibiting commercial dog walking altogether. During development of the draft Plan/EIS, the National Park Service (NPS) carefully considered allowing more than six dogs for commercial and private dog walkers, but dismissed this as a reasonable alternative because it did not comport with two key objectives of the Plan/EIS - visitor experience and safety and resource protection.

In determining a maximum number for the permits, NPS also sought consistency with adjacent jurisdictions, since a consistent number would be easier to understand and to

enforce - two additional draft Plan/EIS objectives. We evaluated the management actions of local and other government entities that have addressed this issue. Two local agencies, Marin County Open Space District and the East Bay Regional Park District, limit numbers to six dogs per dog walker. The majority of agencies surveyed outside the San Francisco Bay Area also limit the number of dogs for commercial walkers to no more than six. These agencies include the City of Boulder Open Space and Mountain Parks, a Colorado agency that pioneered comprehensive dog management planning. The City of San Francisco, with an ordinance allowing up to eight dogs per commercial dog walker in its parks, is an outlier among jurisdictions around the country. Jurisdictions with a primary resource protection and recreation mandate universally settled on six as the maximum number.

We received many public comments on the draft Plan/DEIS regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the number at six dogs with strict guidelines. Other commenters, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker (commercial or private). Some noted that four or more dogs could be hard to control. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of dogs to a maximum of six. A number of commenters requested that commercial dog walking not be allowed at all.

We are very concerned that dog walkers could not consistently control more than six dogs under voice and sight control, particularly in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. Based on public comment, feedback from the discussions of the park's previous Negotiated Rulemaking Committee for Dog Management, park staff observations and research, and law enforcement experience, we believe that allowing more than three dogs without a permit system, or more than six dogs total under a permit system could impact visitor experience and safety, and would not meet the purpose of and need for the Plan/EIS

Along with Presidio Trust, we are similarly concerned about the possible effects of the city's action on park lands, users and resources. Given that the park's Dog Management Plan, final EIS, and final rule, are not expected to be completed until 2015, the combined actions of the City and the Trust, should it adopt the city's regulation, will likely cause a redistribution of commercial dog walkers to NPS lands. As a result, the park is now considering enacting an interim commercial dog walking permit system that would be in place only until the Dog Management Plan/EIS is finalized, and a final rule promulgated. The interim permit would include a limit of six dogs per dog walker, based on information gained in development of the draft Plan/EIS.

In summary, Golden Gate National Recreation Area supports the Presidio Trust's effort to manage this special use, but urges adoption of a lower initial permit limit in their proposed regulation, given the Presidio's presence within the boundaries of a national park unit. We would further encourage the Trust to consider adopting the park's interim permit system, should it be implemented, on either an interim basis or as part of the Trust's final rule.

A combined Presidio Trust and NPS approach to commercial dog walking would provide consistency on federal park lands managed by sister agencies, and equally important, be more likely to fulfill our joint resource protection and visitor experience mandates.

Sincerely,

A handwritten signature in black ink that reads "Frank Dean". The signature is written in a cursive, flowing style.

Frank Dean
General Superintendent



3 of 88 DOCUMENTS

UNITED STATES CODE SERVICE
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*** CURRENT THROUGH PL 111-383, APPROVED 1/7/2011 ***

TITLE 16. CONSERVATION
 CHAPTER 1. NATIONAL PARKS, MILITARY PARKS, MONUMENTS, AND SEASHORES
 GOLDEN GATE NATIONAL RECREATION AREA

Go to the United States Code Service Archive Directory

16 USCS § 460bb

§ 460bb. Establishment

In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the recreation area, the Secretary of the Interior (hereinafter referred to as the "Secretary") shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this Act [*16 USCS §§ 460bb et seq.*], the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.

HISTORY:

(Oct. 27, 1972, P.L. 92-589, § 1, 86 Stat. 1299.)

HISTORY; ANCILLARY LAWS AND DIRECTIVES

Short titles:

Act June 9, 1992, P.L. 102-299, § 1, 106 Stat. 236, provides: "This Act [amending *16 USCS § 460bb-1(a)* and appearing in part as *16 USCS § 460bb-1* note] may be cited as the 'Golden Gate National Recreation Area Addition Act of 1992'."

Act Oct. 24, 2000, P.L. 106-350, § 1, 114 Stat. 1361, provides: "This Act [amending *16 USCS § 460bb-1(a)*] may be cited as the 'Golden Gate National Recreation Area Boundary Adjustment Act of 2000'."

Act Dec. 20, 2005, P.L. 109-131, Title II, § 201, 119 Stat. 2568, provides: "This title [amending *16 USCS § 460bb-1(a)*] may be cited as the 'Rancho Corral de Tierra Golden Gate National Recreation Area Boundary Adjustment Act'."

Other provisions:

The Presidio of San Francisco. Act Nov. 12, 1996, P.L. 104-333, Div I, Title I, 110 Stat. 4097; Nov. 14, 1997, P.L. 105-83, Title III, § 351, 111 Stat. 1607; Nov. 29, 1999, P.L. 106-113, Div B, § 1000(a)(3), 113 Stat. 1535 (enacting into law § 334 of Title III of H.R. 3423 (113 Stat. 1501A-198), as introduced on Nov. 17, 1999); March 10, 2000, P.L. 106-176, Title I, § 101, 114 Stat. 23; Dec. 28, 2001, P.L. 107-107, Div B, Title XXVIII, Subtitle E, § 2861, 115 Stat. 1328, provides:

"Sec. 101. Findings.

"The Congress finds that--

"(1) the Presidio, located amidst the incomparable scenic splendor of the Golden Gate, is one of America's great natural and historic sites;

"(2) the Presidio was the oldest continuously operated military post in the Nation dating from 1776, and was designated a National Historic Landmark in 1962;

"(3) preservation of the cultural and historic integrity of the Presidio for public use recognizes its significant role in the history of the United States;

"(4) the Presidio, in its entirety, is a part of the Golden Gate National Recreation Area, in accordance with Public Law 92-589 [*16 USCS §§ 460bb et seq.*];

"(5) as part of the Golden Gate National Recreation Area, the Presidio's significant natural, historic, scenic, cultural, and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources;

"(6) removal and/or replacement of some structures within the Presidio must be considered as a management option in the administration of the Presidio; and

"(7) the Presidio will be managed through an innovative public/private partnership that minimizes cost to the United States Treasury and makes efficient use of private sector resources.

"Sec. 102. Authority and responsibility of the Secretary of the Interior.

"(a) Interim authority. The Secretary of the Interior (hereinafter in this title referred to as the 'Secretary') is authorized to manage leases in existence on the date of this Act for properties under the administrative jurisdiction of the Secretary and located at the Presidio. Upon the expiration of any such lease, the Secretary may extend such lease for a period terminating not later than 6 months after the first meeting of the Presidio Trust. The Secretary may not enter into any new leases for property at the Presidio to be transferred to the Presidio Trust under this title, however, the Secretary is authorized to enter into agreements for use and occupancy of the Presidio properties which are assignable to the Trust and are terminable with 30 days notice. Prior to the transfer of administrative jurisdiction over any property to the Presidio Trust, and notwithstanding *section 1341 of title 31 of the United States Code*, the proceeds from any such lease shall be retained by the Secretary and such proceeds shall be available, without further appropriation, for the preservation, restoration, operation and maintenance, improvement, repair and related expenses incurred with respect to Presidio properties. The Secretary may adjust the rental charge on any such lease for any amounts to be expended by the lessee for preservation, maintenance, restoration, improvement, repair and related expenses with respect to properties and infrastructure within the Presidio.

"(b) Public information and interpretation. The Secretary shall be responsible, in cooperation with the Presidio Trust, for providing public interpretive services, visitor orientation and educational programs on all lands within the Presidio.

"(c) Other. Those lands and facilities within the Presidio that are not transferred to the administrative jurisdiction of the Presidio Trust shall continue to be managed by the Secretary. The Secretary and the Presidio Trust shall cooperate to ensure adequate public access to all portions of the Presidio. Any infrastructure and building improvement projects that were funded prior to the enactment of this Act shall be completed by the National Park Service.

"(d) Park Service employees.

(1) Any career employee of the National Park Service, employed at the Presidio at the time of the transfer of lands and facilities to the Presidio Trust, shall not be separated from the Service by reason of such transfer, unless such

employee is employed by the Trust, other than on detail. Notwithstanding *section 3503 of title 5, United States Code*, the Trust shall have sole discretion over whether to hire any such employee or request a detail of such employee.

"(2) Any career employee of the National Park Service employed at the Presidio on the date of enactment of this title shall be given priority placement for any available position within the National Park System notwithstanding any priority reemployment lists, directives, rules, regulations or other orders from the Department of the Interior, the Office of Management and Budget, or other Federal agencies.

"Sec. 103. Establishment of the Presidio Trust.

"(a) Establishment. There is established a wholly owned government corporation to be known as the Presidio Trust (hereinafter in this title referred to as the 'Trust').

"(b) Transfer.

(1) Within 60 days after receipt of a request from the Trust for the transfer of any parcel within the area depicted as Area B on the map entitled 'Presidio Trust Number 1', dated December 7, 1995, the Secretary shall transfer such parcel to the administrative jurisdiction of the Trust. Within 1 year after the first meeting of the Board of Directors of the Trust, the Secretary shall transfer to the Trust administrative jurisdiction over all remaining parcels within Area B. Such map shall be on file and available for public inspection in the offices of the Trust and in the offices of the National Park Service, Department of the Interior. The Trust and the Secretary may jointly make technical and clerical revisions in the boundary depicted on such map. The Secretary shall retain jurisdiction over those portions of the building identified as number 102 as the Secretary deems essential for use as a visitor center. The Building shall be named the 'William Penn Mott Visitor Center'. Any parcel of land, the jurisdiction over which is transferred pursuant to this subsection, shall remain within the boundary of the Golden Gate National Recreation Area. With the consent of the Secretary, the Trust may at any time transfer to the administrative jurisdiction of the Secretary any other properties within the Presidio which are surplus to the needs of the Trust and which serve essential purposes of the Golden Gate National Recreation Area. The Trust is encouraged to transfer to the administrative jurisdiction of the Secretary open space areas which have high public use potential and are contiguous to other lands administered by the Secretary.

"(2) Within 60 days after the first meeting of the Board of Directors of the Trust, the Trust and the Secretary shall determine cooperatively which records, equipment, and other personal property are deemed to be necessary for the immediate administration of the properties to be transferred, and the Secretary shall immediately transfer such personal property to the Trust. Within 1 year after the first meeting of the Board of Directors of the Trust, the Trust and the Secretary shall determine cooperatively what, if any, additional records, equipment, and other personal property used by the Secretary in the administration of the properties to be transferred should be transferred to the Trust.

"(3) The Secretary shall transfer, with the transfer of administrative jurisdiction over any property, the unobligated balance of all funds appropriated to the Secretary, all leases, concessions, licenses, permits, and other agreements affecting such property.

"(4) At the request of the Trust, the Secretary shall provide funds to the Trust for preparation of the program required under section 104(c) of this title, hiring of initial staff and other activities deemed by the Trust as essential to the establishment of the Trust prior to the transfer of properties to the Trust.

"(c) Board of Directors.

(1) In general. The powers and management of the Trust shall be vested in a Board of Directors (hereinafter referred to as the 'Board') consisting of the following 7 members:

"(A) The Secretary of the Interior or the Secretary's designee.

"(B) 6 individuals, who are not employees of the Federal Government, appointed by the President, who shall possess extensive knowledge and experience in one or more of the fields of city planning, finance, real estate development, and resource conservation. At least one of these individuals shall be a veteran of the Armed Services. At least 3 of these individuals shall reside in the San Francisco Bay Area. The President shall make the appointments referred to in this subparagraph within 90 days after the enactment of this Act and shall ensure that the fields of city planning, finance, real estate development, and resource conservation are adequately represented. Upon establishment of the Trust, the Chairman of the Board of Directors of the Trust shall meet with the Chairman of the Energy and Natural Resources Committee of the United States Senate and the Chairman of the Resources Committee of the United States House of Representatives.

"(2) Terms. Members of the Board appointed under paragraph (1)(B) shall each serve for a term of 4 years, except

that of the members first appointed, 3 shall serve for a term of 2 years. Any vacancy in the Board shall be filled in the same manner in which the original appointment was made, and any member appointed to fill a vacancy shall serve for the remainder of that term for which his or her predecessor was appointed. No appointed member may serve more than 8 years in consecutive terms, except that upon the expiration of his or her term, an appointed member may continue to serve until his or her successor has been appointed.

"(3) Quorum. Four members of the Board shall constitute a quorum for the conduct of business by the Board.

"(4) Organization and compensation. The Board shall organize itself in such a manner as it deems most appropriate to effectively carry out the authorized activities of the Trust. Board members shall serve without pay, but may be reimbursed for the actual and necessary travel and subsistence expenses incurred by them in the performance of the duties of the Trust.

"(5) Liability of directors. Members of the Board of Directors shall not be considered Federal employees by virtue of their membership on the Board, except for purposes of the Federal Tort Claims Act [28 USCS §§ 2671 et seq. generally; for full classification, consult USCS Tables volumes] and the Ethics in Government Act [5 USCS Appx], and the provisions of chapter 11 of title 18, United States Code [18 USCS §§ 201 et seq.].

"(6) Meetings. The Board shall meet at least three times per year in San Francisco and at least two of those meetings shall be open to the public. Upon a majority vote, the Board may close any other meetings to the public. The Board shall establish procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues. The Board may establish procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues through the Golden Gate National Recreation Area Advisory Commission.

"(7) Staff. Notwithstanding any other provisions of law, the Trust is authorized to appoint and fix the compensation and duties and terminate the services of an executive director and such other officers and employees as it deems necessary without regard to the provisions of title 5, United States Code, or other laws related to the appointment, compensation or termination of Federal employees.

"(8) Necessary powers. The Trust shall have all necessary and proper powers for the exercise of the authorities vested in it.

"(9) Taxes. The Trust and all properties administered by the Trust and all interest created under leases, concessions, permits and other agreements associated with the properties shall be exempt from all taxes and special assessments of every kind by the State of California, and its political subdivisions, including the City and County of San Francisco.

"(10) Government corporation.

(A) The Trust shall be treated as a wholly owned Government corporation subject to chapter 91 of title 31, United States Code [31 USCS §§ 9101 et seq.] (commonly referred to as the Government Corporation Control Act). Financial statements of the Trust shall be audited annually in accordance with *section 9105 of title 31 of the United States Code*.

(B) At the end of each calendar year, the Trust shall submit to the Committee on Energy and Natural Resources of the United States Senate and the Committee on Resources of the House of Representatives a comprehensive and detailed report of its operations, activities, and accomplishments for the prior fiscal year. The report also shall include a section that describes in general terms the Trust's goals for the current fiscal year.

"Sec. 104. Duties and authorities of the Trust.

"(a) Overall requirements of the Trust. The Trust shall manage the leasing, maintenance, rehabilitation, repair and improvement of property within the Presidio under its administrative jurisdiction using the authorities provided in this section, which shall be exercised in accordance with the purposes set forth in section 1 of the Act entitled "An Act to establish the Golden Gate National Recreation Area in the State of California, and for other purposes", approved October 27, 1972 (Public Law 92-589; 86 Stat. 1299; 16 U.S.C. 460bb), and in accordance with the general objectives of the General Management Plan (hereinafter referred to as the 'management plan') approved for the Presidio.

"(b) Authorities. The Trust may participate in the development of programs and activities at the properties transferred to the Trust, except that the Trust shall have the authority to negotiate and enter into such agreements, leases, contracts and other arrangements with any person, firm, association, organization, corporation or governmental entity, including, without limitation, entities of Federal, State and local governments as are necessary and appropriate to carry out its authorized activities. The National Park Service or any other Federal agency is authorized to enter into agreements, leases, contracts and other arrangements with the Presidio Trust which are necessary and appropriate to carry out the

purposes of this title. Any such agreement may be entered into without regard to section 321 of the Act of June 30, 1932 (40 U.S.C. 303b) [repealed and reenacted as 40 USCS § 1302]. The Trust may use alternative means of dispute resolution authorized under subchapter IV of chapter 5 of title 5, United States Code (5 U.S.C. 571 et seq.). The Trust shall establish procedures for lease agreements and other agreements for use and occupancy of Presidio facilities, including a requirement that in entering into such agreements the Trust shall obtain reasonable competition. The Trust may not dispose of or convey fee title to any real property transferred to it under this title. Federal laws and regulations governing procurement by Federal agencies shall not apply to the Trust, with the exception of laws and regulations related to Federal government contracts governing working conditions and wage rates, including the provisions of sections 276a-276a-6 of title 40, United States Code (Davis-Bacon Act) [repealed and reenacted as 40 USCS §§ 3141-3144, 3146 and 3147], and any civil rights provisions otherwise applicable thereto. The Trust, in consultation with the Administrator of Federal Procurement Policy, shall establish and promulgate procedures applicable to the Trust's procurement of goods and services including, but not limited to, the award of contracts on the basis of contractor qualifications, price, commercially reasonable buying practices, and reasonable competition. The Trust is authorized to use funds available to the Trust to purchase insurance and for reasonable reception and representation expenses, including membership dues, business cards and business related meal expenditures.

"(c) Management program. The Trust shall develop a comprehensive program for management of those lands and facilities within the Presidio which are transferred to the administrative jurisdiction of the Trust. Such program shall be designed to reduce expenditures by the National Park Service and increase revenues to the Federal Government to the maximum extent possible. In carrying out this program, the Trust shall be treated as a successor in interest to the National Park Service with respect to compliance with the National Environmental Policy Act [42 USCS §§ 4321 et seq.] and other environmental compliance statutes. Such program shall consist of--

"(1) demolition of structures which in the opinion of the Trust, cannot be cost-effectively rehabilitated, and which are identified in the management plan for demolition,

"(2) evaluation for possible demolition or replacement those buildings identified as categories 2 through 5 in the Presidio of San Francisco Historic Landmark District Historic American Buildings Survey Report, dated 1985,

"(3) new construction limited to replacement of existing structures of similar size in existing areas of development, and

"(4) examination of a full range of reasonable options for carrying out routine administrative and facility management programs.

The Trust shall consult with the Secretary in the preparation of this program.

"(d) Financial authorities.

(1) To augment or encourage the use of non-Federal funds to finance capital improvements on Presidio properties transferred to its jurisdiction, the Trust, in addition to its other authorities, shall have the following authorities subject to the Federal Credit Reform Act of 1990 (2 U.S.C. 661 et seq.):

"(A) The authority to guarantee any lender against loss of principal or interest on any loan: *Provided*, That--

"(i) the terms of the guarantee are approved by the Secretary of the Treasury;

"(ii) adequate subsidy budget authority is provided in advance in appropriations Acts; and

"(iii) such guarantees are structured so as to minimize potential cost to the Federal Government. No loan guarantee under this title shall cover more than 75 percent of the unpaid balance of the loan. The Trust may collect a fee sufficient to cover its costs in connection with each loan guaranteed under this title. The authority to enter into any such loan guarantee agreement shall expire at the end of 15 years after the date of enactment of this title.

"(B) The authority, subject to appropriations, to make loans to the occupants of property managed by the Trust for the preservation, restoration, maintenance, or repair of such property.

"(2) The Trust shall also have the authority to issue obligations to the Secretary of the Treasury, but only if the Secretary of the Treasury agrees to purchase such obligations to the extent authorized in advance in appropriations acts. The Secretary of the Treasury is authorized to use as a public debt transaction the proceeds from the sale of any securities issued under chapter 31 of title 31, United States Code [31 USCS §§ 3101 et seq.], and the purposes for which securities may be issued under such chapter are extended to include any purchase of such notes or obligations acquired by the Secretary of the Treasury under this subsection. Obligations issued under this subparagraph shall be in such forms and denominations, bearing such maturities, and subject to such terms and conditions, including a review of the

creditworthiness of the loan and establishment of a repayment schedule, as may be prescribed by the Secretary of the Treasury, and shall bear interest at a rate determined by the Secretary of the Treasury, taking into consideration current market yields on outstanding marketable obligations of the United States of comparable maturities. No funds appropriated to the Trust may be used for repayment of principal or interest on, or redemption of, obligations issued under this paragraph.

"(3) The aggregate amount of obligations issued under paragraph (2) of this subsection which are outstanding at any one time may not exceed \$ 150,000,000.

"(e) Donations. The Trust may solicit and accept donations of funds, property, supplies, or services from individuals, foundations, corporations, and other private or public entities for the purpose of carrying out its duties. The Trust is encouraged to maintain a liaison with the Golden Gate National Park Association.

"(f) Public agency. The Trust shall be deemed to be a public agency for purposes of entering into joint exercise of powers agreements pursuant to California government code section 6500 and related provisions of that Code.

"(g) Financial management. Notwithstanding *section 1341 of title 31 of the United States Code*, all proceeds and other revenues received by the Trust shall be retained by the Trust. Those proceeds shall be available, without further appropriation, to the Trust for the administration, preservation, restoration, operation and maintenance, improvement, repair and related expenses incurred with respect to Presidio properties under its administrative jurisdiction. The Secretary of the Treasury shall invest, at the direction of the Trust, such excess moneys that the Trust determines are not required to meet current withdrawals. Such investment shall be in public debt securities with maturities suitable to the needs of the Trust and bearing interest at rates determined by the Secretary of the Treasury taking into consideration the current average yield on outstanding marketable obligations of the United States of comparable maturity.

"(h) Suits. The Trust may sue and be sued in its own name to the same extent as the Federal Government. Litigation arising out of the activities of the Trust shall be conducted by the Attorney General; except that the Trust may retain private attorneys to provide advice and counsel. The District Court for the Northern District of California shall have exclusive jurisdiction over any suit filed against the Trust.

"(i) Memorandum of agreement. The Trust shall enter into a Memorandum of Agreement with the Secretary, acting through the Chief of the United States Park Police, for the conduct of law enforcement activities and services within those portions of the Presidio transferred to the administrative jurisdiction of the Trust.

"(j) Bylaws, rules, and regulations. The Trust may adopt, amend, repeal, and enforce bylaws, rules and regulations governing the manner in which its business may be conducted and the powers vested in it may be exercised, including rules and regulations for the use and management of the property under the Trust's jurisdiction. The Trust is authorized, in consultation with the Secretary, to adopt and to enforce those rules and regulations that are applicable to the Golden Gate National Recreation Area and that may be necessary and appropriate to carry out its duties and responsibilities under this title. The Trust shall give notice of the adoption of such rules and regulations by publication in the Federal Register.

"(k) Direct negotiations. For the purpose of compliance with applicable laws and regulations concerning properties transferred to the Trust by the Secretary, the Trust shall negotiate directly with regulatory authorities.

"(l) Insurance. The Trust shall require that all leaseholders and contractors procure proper insurance against any loss in connection with properties under lease or contract, or the authorized activities granted in such lease or contract, as is reasonable and customary.

"(m) Building code compliance. The Trust shall bring all properties under its administrative jurisdiction into compliance with Federal building codes and regulations appropriate to use and occupancy within 10 years after the enactment of this title to the extent practicable.

"(n) Leasing. In managing and leasing the properties transferred to it, the Trust shall consider the extent to which prospective tenants contribute to the implementation of the general objectives of the General Management Plan for the Presidio and to the reduction of cost to the Federal Government. The Trust shall give priority to the following categories of tenants: Tenants that enhance the financial viability of the Presidio and tenants that facilitate the cost-effective preservation of historic buildings through their reuse of such buildings.

"(o) Reversion. If, at the expiration of 15 years, the Trust has not accomplished the goals and objectives of the plan required in section 105(b) of this title, then all property under the administrative jurisdiction of the Trust pursuant to section 103(b) of this title shall be transferred to the Administrator of the General Services Administration to be

disposed of in accordance with the procedures outlined in the Defense Authorization Act of 1990 [for full classification, consult USCS Tables volumes] (104 Stat. 1809), and any real property so transferred shall be deleted from the boundary of the Golden Gate National Recreation Area. In the event of such transfer, the terms and conditions of all agreements and loans regarding such lands and facilities entered into by the Trust shall be binding on any successor in interest.

"(p) Exclusive rights to name and insignia. The Trust shall have the sole and exclusive right to use the words 'Presidio Trust' and any seal, emblem, or other insignia adopted by its Board of Directors. Without express written authority of the Trust, no person may use the words 'Presidio Trust', or any combination or variation of those words alone or with other words, as the name under which that person shall do or purport to do business, for the purpose of trade, or by way of advertisement, or in any manner that may falsely suggest any connection with the Trust.

"Sec. 105. Limitations on funding.

"(a)

(1) From amounts made available to the Secretary for the operation of areas within the Golden Gate National Recreation Area, not more than \$ 25,000,000 shall be available to carry out this title in each fiscal year after the enactment of this title until the plan is submitted under subsection (b). Such sums shall remain available until expended.

"(2) After the plan required in subsection (b) is submitted, and for each of the 14 fiscal years thereafter, there are authorized to be appropriated to the Trust not more than the amounts specified in such plan. Such sums shall remain available until expended. Of such sums, funds shall be available through the Trust for law enforcement activities and services to be provided by the United States Park Police at the Presidio in accordance with section 104(i) of this title.

"(b) Within 1 year after the first meeting of the Board of Directors of the Trust, the Trust shall submit to Congress a plan which includes a schedule of annual decreasing federally appropriated funding that will achieve, at a minimum, self-sufficiency for the Trust within 15 complete fiscal years after such meeting of the Trust. No further funds shall be authorized for the Trust 15 years after the first meeting of the Board of Directors of the Trust.

"(c) The Administrator of the General Services Administration shall provide necessary assistance, on a reimbursable basis, including detailees as necessary, to the Trust in the formulation and submission of the annual budget request for the administration, operation, and maintenance of the Presidio.

"Sec. 106. General Accounting Office [Government Accountability Office] study.

"(a) Three years after the first meeting of the Board of Directors of the Trust, the General Accounting Office [Government Accountability Office] shall conduct an interim study of the activities of the Trust and shall report the results of the study to the Committee on Energy and Natural Resources and the Committee on Appropriations of the United States Senate, and the Committee on Resources and Committee on Appropriations of the House of Representatives. The study shall include, but shall not be limited to, details of how the Trust is meeting its obligations under this title.

"(b) In consultation with the Trust, the General Accounting Office [Government Accountability Office] shall develop an interim schedule and plan to reduce and replace the Federal appropriations to the extent practicable for interpretive services conducted by the National Park Service, and law enforcement activities and services, fire and public safety programs conducted by the Trust.

"(c) Seven years after the first meeting of the Board of Directors of the Trust, the General Accounting Office [Government Accountability Office] shall conduct a comprehensive study of the activities of the Trust, including the Trust's progress in meeting its obligations under this title, taking into consideration the results of the study described in subsection (a) and the implementation of plan and schedule required in subsection (b). The General Accounting Office [Government Accountability Office] shall report the results of the study, including any adjustments to the plan and schedule, to the Committee on Energy and Natural Resources and the Committee on Appropriations of the United States Senate, and the Committee on Resources and Committee on Appropriations of the House of Representatives.

"Sec. 107. Conditional authority to lease certain housing units within the Presidio.

"(a) Availability of housing units for long-term Army lease. Subject to subsection (c), the Trust shall make available for lease, to those persons designated by the Secretary of the Army and for such length of time as requested by the Secretary of the Army, 22 housing units located within the Presidio that are under the administrative jurisdiction of the Trust and specified in the agreement between the Trust and the Secretary of the Army in existence as of the date of the enactment of this section.

"(b) Lease amount. The monthly amount charged by the Trust for the lease of a housing unit under this section shall

be equivalent to the monthly rate of the basic allowance for housing that the occupant of the housing unit is entitled to receive under *section 403 of title 37, United States Code*.

"(c) Condition on continued availability of housing units. Effective after the end of the four-year period beginning on the date of the enactment of this section [enacted Dec. 28, 2001], the Trust shall have no obligation to make housing units available under subsection (a) unless, during that four-year period, the Secretary of the Treasury purchases new obligations of at least \$ 80,000,000 issued by the Trust under section 104(d)(2). In the event that this condition is not satisfied, the existing agreement referred to in subsection (a) shall be renewed on the same terms and conditions for an additional five years."

Presidio Trust property interests; exemption from State taxes and special assessments. Act Oct. 11, 2000, P.L. 106-291, Title III, § 315, 114 Stat. 989, provides: "All interests created under leases, concessions, permits and other agreements associated with the properties administered by the Presidio Trust, hereafter shall be exempt from all taxes and special assessments of every kind by the State of California and its political subdivisions."

Similar provisions were contained in Act Nov. 29, 1999, P.L. 106-113, Div B, § 1000(a)(3), 113 Stat. 1535 (enacting into law § 316 of Title III of H.R. 3423 (113 Stat. 1501A-192), as introduced on Nov. 17, 1999).

Fee-based education, interpretive and visitor service functions. Act Nov. 10, 2003, P.L. 108-108, Title I, § 118, 117 Stat. 1268, provides: "Notwithstanding other provisions of law, the National Park Service hereafter may authorize, through cooperative agreement, the Golden Gate National Parks Association to provide fee-based education, interpretive and visitor service functions within the Crissy Field and Fort Point areas of the Presidio."

Similar provisions were contained in Acts Oct. 11, 2000, P.L. 106-291, Title I, § 140, 114 Stat. 949; Nov. 5, 2001, P.L. 107-63, Title I, § 123, 115 Stat. 440; Feb. 20, 2003, P.L. 108-7, Div F, Title I, § 120, 117 Stat. 240.

NOTES:

Code of Federal Regulations:

- Presidio Trust--Requests under the Freedom of Information Act, *36 CFR 1007.1* et seq.
- Presidio Trust--Requests under the Privacy Act, *36 CFR 1008.1* et seq.
- Presidio Trust--Administrative claims under the Federal Tort Claims Act, *36 CFR 1009.1* et seq.
- Presidio Trust--Environmental quality, *36 CFR 1010.1* et seq.
- Presidio Trust--Debt collection, *36 CFR 1011.1* et seq.
- Presidio Trust--Legal process: testimony by employees and production of records, *36 CFR 1012.1* et seq.

Research Guide:

Texts:

- 5 Treatise on Environmental Law (Matthew Bender), ch 12, Public Lands and Conservation § 12.03.

Interpretive Notes and Decisions:

Since legislation establishing Presidio Trust (wholly-owned government corporation established to exercise administrative jurisdiction over Presidio) provides that federal procurement laws and regulations do not apply to Trust, except for listed exceptions (Act Nov. 12, 1996, P.L. 104-333, Div I, Title I, 110 Stat. 4097, which appears as *16 USCS § 460bb* note), which do not include Competition in Contracting Act (*31 USCS §§ 3551* et seq.), and Presidio Trust Procurement Policy expressly provides that Competition in Contracting Act does not apply to Trust's procurements, Trust is not subject to Comptroller General's bid protest jurisdiction under Competition in *Contracting Act*.

Performance Excavators, Inc. (3/17/03) Comp. Gen. Dec. No. B-291771, 2003 US Comp Gen LEXIS 34.

In action by city against National Park Service in which city sought to enjoin NPS from implementing its Fort Baker Plan for development and rehabilitation of former military base into national park, district court properly concluded that NPS did not violate National Park Service Organic Act, 16 USCS §§ 1a-1 et seq., or Act creating Golden Gate National Recreation Area, 16 USCS § 460bb; development contemplated by Plan was not fundamentally at odds with directives in either Act and, further, NPS balanced potential harms of development with its responsibilities for conservation, preservation, and public service. *City of Sausalito v O'Neill (2004, CA9 Cal) 386 F3d 1186, 59 Env't Rep Cas 1304, 34 ELR 20121.*

Golden Gate National Recreation Area Act (16 USCS §§ 460bb et seq.), which went into effect on 27 October 1972, authorized Secretary of Interior to acquire, preserve, and administer certain areas of Marin and San Francisco Counties, California, "to provide for the maintenance of needed recreational open space." *United States v 3.66 Acres of Land (1977, ND Cal) 426 F Supp 533.*

Legislative history of Golden Gate National Recreation Area (established under 16 USCS §§ 460bb et seq.) does not imply congressional tolerance towards hunting and trapping in area, for committee report stresses need for expanded outdoor recreation activities, but makes no mention of hunting, or any "otherwise available" authority of Secretary of Interior. *National Rifle Assn. v Potter (1986, DC Dist Col) 628 F Supp 903, 16 ELR 20356.*

Dog walkers may be entitled to preliminary injunction to take effect in August upon annual departure of bank swallows, in challenge to officials' closure of certain off-leash dog walking areas of "Fort Funston" multi-use recreational area, even though closure is intended to protect "threatened" bank swallow, because National Park Service regulation likely was violated by after-fact declaration instead of adequate notice and chance for public input on decision involving heated controversy and change in public-use pattern. *Ft. Funston Dog Walkers v Babbitt (2000, ND Cal) 96 F Supp 2d 1021.*



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*** CURRENT THROUGH PL 111-383, APPROVED 1/7/2011 ***

TITLE 16. CONSERVATION
 CHAPTER 1. NATIONAL PARKS, MILITARY PARKS, MONUMENTS, AND SEASHORES
 GOLDEN GATE NATIONAL RECREATION AREA

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16 USCS § 460bb-1

§ 460bb-1. Composition and boundaries

(a) Areas included and excluded.

(1) Initial lands. The recreation area shall comprise the lands, waters, and submerged lands generally depicted on the map entitled: "Revised Boundary Map, Golden Gate National Recreation Area", numbered NRA-GG-80,003-K and dated October 1978, plus those areas depicted on the map entitled "Point Reyes and GGNRA Amendments and dated October 25, 1979". The authority of the Secretary to acquire lands in the tract known as San Francisco Assessor's Block number 1592 shall be limited to an area of not more than one and nine-tenths acres. Notwithstanding any other provision of this Act [*16 USCS §§ 460bb et seq.*], the Secretary shall not acquire the Marin County Assessor's parcels numbered 199-181-01, 199-181-06, 199-181-08, 199-181-13, and 199-181-14, located in the Muir Beach portion of the recreation area. For the purposes of this Act [*16 USCS §§ 460bb et seq.*], the southern end of the town of Marshall shall be considered to be the Marshall Boat Works.

(2) Additional lands. In addition to the lands described in paragraph (1), the recreation area shall include the following:

(A) The parcels numbered by the Assessor of Marin County, California, 119-040-04, 119-040-05, 119-040-18, 166-202-03, 166-010-06, 166-010-07, 166-010-24, 166-010-25, 119-240-19, 166-010-10, 166-010-22, 119-240-03, 119-240-51, 119-240-52, 119-240-54, 166-010-12, 166-010-13, and 119-235-10.

(B) Lands and waters in San Mateo County generally depicted on the map entitled "Sweeney Ridge Addition, Golden Gate National Recreation Area", numbered NRA GG-80,000-A, and dated May 1980.

(C) Lands acquired under the Golden Gate National Recreation Area Addition Act of 1992 (*16 U.S.C. 460bb-1* note; Public Law 102-299).

(D) Lands generally depicted on the map entitled "Additions to Golden Gate National Recreation Area", numbered NPS-80-076, and dated July 2000/PWR-PLRPC.

(E) Lands generally depicted on the map entitled "Rancho Corral de Tierra Additions to the Golden Gate National Recreation Area", numbered NPS-80,079E, and dated March 2004.

(3) Acquisition limitation. The Secretary may acquire land described in paragraph (2)(E) only from a willing seller.

(b) Boundary revisions; notification of Congressional committees; publication in Federal Register. The maps referred to in this section shall be on file and available for public inspection in the Offices of the National Park Service, Department of the Interior, Washington, District of Columbia. After advising the Committee on Natural Resources of the House of Representatives [Committee on Resources of the House of Representatives] and the Committee on Energy and Natural Resources of the Senate (hereinafter referred to as the "committees") in writing, the Secretary may make minor revisions of the boundaries of the recreation area when necessary by publication of a revised drawing or other boundary description in the Federal Register.

HISTORY:

(Oct. 27, 1972, P.L. 92-589, § 2, 86 Stat. 1299; Dec. 26, 1974, P.L. 93-544, 88 Stat. 1741; Nov. 10, 1978, P.L. 95-625, Title III, § 317(a), 92 Stat. 3484; March 5, 1980, P.L. 96-199, Title I, § 103(a), 94 Stat. 68; Sept. 8, 1980, P.L. 96-344, § 4, 94 Stat. 1134; Dec. 28, 1980, P.L. 96-607, Title X, § 1001(1), (2), 94 Stat. 3544; June 9, 1992, P.L. 102-299, § 2(b)(1), 106 Stat. 236; Nov. 2, 1994, P.L. 103-437, § 6(n)(2), 108 Stat. 4586; Oct. 24, 2000, P.L. 106-350, § 2, 114 Stat. 1361; Dec. 20, 2005, P.L. 109-131, Title II, § 202, 119 Stat. 2568.)

HISTORY; ANCILLARY LAWS AND DIRECTIVES

References in text:

The "Golden Gate National Recreation Area Addition Act of 1992", referred to in subsec. (a)(2)(C), is Act June 9, 1992, P.L. 102-299, which amended this section and appears in part as notes to this section.

Explanatory notes:

The bracketed words "Committee on Resources of the House of Representatives" have been inserted in this section on the authority of § 1(a)(8) of Act June 3, 1995, P.L. 104-14, which appears as a note preceding 2 USCS § 21, which provides that any reference to the Committee on Natural Resources of the House of Representatives in any provision of law enacted before January 4, 1995, shall be treated as referring to the Committee on Resources of the House of Representatives.

Amendments:

1974. Act Dec. 26, 1974, in subsec. (a), substituted "Revised Boundary Map . . . (2) Panoramic Highways area, Stinson Beach, 40.65 acres." for "Boundary Map, Golden Gate National Recreation Area, numbered NRA-GG-80,003, sheets 1 through 3, and dated July, 1972."

1978. Act Nov. 10, 1978 substituted subsec. (a) for one which read:

"The recreation area shall comprise the lands, waters, and submerged lands generally depicted on the map entitled 'Revised Boundary Map, Golden Gate National Recreation Area, numbered NRA-GG-80,003-G, and dated September 1974', which shall include, in addition to the existing properties within the Golden Gate National Recreation Area, the following:

"Marin County:

- "(1) Allan Associates, Incorporated property, 38.89 acres,
- "(2) County of Marin and Tamalpais Community Services District lands, 22.94 acres,
- "(3) Ghilotti Brothers property, 10.40 acres,
- "(4) Oakwood Valley area, various properties, 208.89 acres,

"(5) Olds property, 207.56 acres,

"(6) Wolfback Ridge area, various properties, approximately 265 acres, including approximately 30 acres known as South Ridge Lands: Provided, That the Secretary is authorized to acquire such interest as he deems reasonably necessary to preserve the scenic quality of the 9.47 acres designated for scenic protection,

"(7) Keller property, Stinson Beach, 10.59 acres,

"(8) Leonard property, Stinson Beach, 8.25 acres,

"(9) Muir Beach properties, 3.94 acres.

"San Francisco County:

"Haslett Warehouse; and shall exclude the following:

"(1) Leonard (homesite), 10.03 acres,

"(2) Panoramic Highway area, Stinson Beach, 40.65 acres.".

1980. Act March 5, 1980, in subsec. (a), inserted ", plus those areas depicted on the map entitled 'Point Reyes and GGNRA Amendments and dated October 25, 1979' ".

Act Sept. 8, 1980, in subsec. (a), added "For the purposes of this Act, the southern end of the town of Marshall shall be considered to be the Marshall Boat Works. The following additional lands are also hereby included within the boundaries of the recreation area: Marin County Assessor's parcel numbered 119-040-04, 119-040-05, 119-040-18, 166-202-03, 166-010-06, 166-010-07, 166-010-24, 166-010-25, 119-240-19, 166-010-10, 166-010-22, 119-240-03, 119-240-51, 119-240-52, 119-240-54, 166-010-12, 166-010-13, and 119-235-10.".

Act Dec. 28, 1980, in subsec. (a), added "The recreation area shall also include the lands and waters in San Mateo County generally depicted on the map entitled 'Sweeney Ridge Addition, Golden Gate National Recreation Area', numbered NRA GG-80,000-A, and dated May 1980."; and in subsec. (b), substituted "maps" for "map".

1992. Act June 9, 1992, in subsec. (a), added "The recreation area shall also include those lands acquired pursuant to the Golden Gate National Recreation Area Addition Act of 1992.".

1994. Act Nov. 2, 1994, in subsec. (b), substituted "Committee on Natural Resources of the House of Representatives and the Committee on Energy and Natural Resources of the Senate" for "Committees on Interior and Insular Affairs of the United States House of Representatives and the United States Senate".

2000. Act Oct. 24, 2000, in subsec. (a), added sentence beginning "The recreation area shall also include the lands generally depicted on the map . . .".

2005. Act Dec. 20, 2005, in subsec. (a), inserted "(1) Initial lands.", and substituted paras. (2) and (3) for "The following additional lands are also hereby included within the boundaries of the recreation area: Marin County Assessor's parcel numbered 119-040-04, 119-040-05, 119-040-18, 166-202-03, 166-010-06, 166-010-07, 166-010-24, 166-010-25, 119-240-19, 166-010-10, 166-010-22, 119-240-03, 119-240-51, 119-240-52, 119-240-54, 166-010-12, 166-010-13, and 119-235-10. The recreation area shall also include the lands and waters in San Mateo County generally depicted on the map entitled 'Sweeney Ridge Addition, Golden Gate National Recreation Area', numbered NRA GG-80,000-A, and dated May 1980. The recreation area shall also include those lands acquired pursuant to the Golden Gate National Recreation Area Addition Act of 1992. The recreation area shall also include the lands generally depicted on the map entitled 'Additions to Golden Gate National Recreation Area', numbered NPS-80,076, and dated July 2000/PWR-PLRPC.".

Other provisions:

Senate Committee on Energy and Natural Resources; change of name. The Committee on Interior and Insular Affairs of the Senate was abolished and replaced by the Committee on Energy and Natural Resources of the Senate, Effective Feb. 11, 1977. See Rule XXV of the Standing Rules of the Senate, as amended by Senate Resolution 4 (popularly cited as the "Committee System Reorganization Amendments of 1977"), approved Feb. 4, 1977.

Acquisition and addition to Golden Gate National Recreation Area. Act June 9, 1992, P.L. 102-299, § 2(a), (b)(2), 106 Stat. 236, provides:

"(a) Acquisition. The Secretary of the Interior is authorized to acquire by donation or purchase with donated or appropriated funds approximately 1,232 acres of land in San Mateo County, California, known generally as the Phleger property, as generally depicted on the map entitled '1991 Addition to Golden Gate National Recreation Area (Phleger Estate)' and numbered GGNRA641/40062. The Federal share of the acquisition of the lands acquired pursuant to this Act may not exceed 50 percent of the purchase price of such lands."

"(b)

(1) [Omitted--This paragraph amended *16 USCS § 460bb-1*.]

"(2) Upon acquisition of the land under subsection (a) and after publication of notice in the Federal Register, the Secretary shall--

"(A) revise the boundary of Golden Gate National Recreation Area to reflect the inclusion of such land; and

"(B) prepare and make available a map displaying such boundary revision in accordance with section 2(b) of such Act (*16 U.S.C. 460bb-1(b)*)."

NOTES:

Related Statutes & Rules:

This section is referred to in *16 USCS § 460bb-2*.



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§ 460bb-2. Acquisition policy

(a) Authority of Secretary; exchange of property; disposal of certain lands; transfer from Federal agency to administrative jurisdiction of Secretary; facilities and improvements under permit from Secretary of the Army. Within the boundaries of the recreation area, the Secretary may acquire lands, improvements, waters, or interests therein, by donation, purchase, exchange or transfer. Any lands, or interests therein, owned by the State of California or any political subdivision thereof, may be acquired only by donation. When any tract of land is only partly within such boundaries, the Secretary may acquire all or any portion of the land outside of such boundaries in order to minimize the payment of severance costs. Land so acquired outside of the boundaries may be exchanged by the Secretary for non-Federal lands within the boundaries. Any portion of land acquired outside the boundaries and not utilized for exchange shall be reported to the General Services Administration for disposal under the Federal Property and Administrative Services Act of 1949 (63 Stat. 377), as amended: *Provided*, That no disposal shall be for less than fair market value. Except as hereinafter provided, Federal property within the boundaries of the recreation area is hereby transferred without consideration to the administrative jurisdiction of the Secretary for the purposes of this Act [*16 USCS §§ 460bb et seq.*], subject to the continuation of such existing uses as may be agreed upon between the Secretary and the head of the agency formerly having jurisdiction over the property. Notwithstanding any other provision of law, the Secretary may develop and administer for the purposes of this Act [*16 USCS §§ 460bb et seq.*] structures or other improvements and facilities on lands for which he receives a permit of use and occupancy from the Secretary of the Army.

(b) Transfer of certain properties to administrative jurisdiction of Secretary; military properties, reservation of use and occupancy by Secretary of the Army; radio receiver station, retention of jurisdiction when not superfluous. Fort Cronkhite, Fort Barry, and the westerly one-half of Fort Baker, in Marin County, California, as depicted on the map entitled "Golden Gate Military Properties" numbered NRAGG-20,002 and dated January 1972, which shall be on file and available for public inspection in the offices of the National Park Service, are hereby transferred to the jurisdiction of the Secretary for purposes of this Act [*16 USCS §§ 460bb et seq.*], subject to continued use and occupancy by the Secretary of the Army of those lands needed for existing air defense missions, reserve activities and family housing,

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until he determines that such requirements no longer exist. The Coast Guard Radio Receiver Station, shall remain under the jurisdiction of the Secretary of the Department in which the Coast Guard is operating. When this station is determined to be excess to the needs of the Coast Guard, it shall be transferred to the jurisdiction of the Secretary for purposes of this Act [16 USCS §§ 460bb et seq.].

(c) Military property; public service facilities; construction, maintenance, and determinations of identity and location by Secretary of the Army. The easterly one-half of Fort Baker in Marin County, California, shall remain under the jurisdiction of the Department of the Army. When this property is determined by the Department of Defense to be excess to its needs, it shall be transferred to the jurisdiction of the Secretary for purposes of this Act [16 USCS §§ 460bb et seq.]. The Secretary of the Army shall grant to the Secretary reasonable public access through such property to Horseshoe Bay, together with the right to construct and maintain such public service facilities as are necessary for the purposes of this Act [16 USCS §§ 460bb et seq.]. The precise facilities and location thereof shall be determined between the Secretary and the Secretary of the Army.

(d) Presidio of San Francisco; use and occupation of certain acreage by Secretary. Upon enactment [enacted Oct. 27, 1972], the Secretary of the Army shall grant to the Secretary the irrevocable use and occupancy of one hundred acres of the Baker Beach area of the Presidio of San Francisco, as depicted on the map referred to in subsection (b).

(e) Use and occupancy of airfield acreage by Secretary. The Secretary of the Army shall grant to the Secretary within a reasonable time, the irrevocable use and occupancy of forty-five acres of the Crissy Army Airfield of the Presidio, as depicted on the map referred to in subsection (b).

(f) Transfer of remainder to administrative jurisdiction of Secretary; use and occupancy by Coast Guard under permit from Secretary. When all or any substantial portion of the remainder of the Presidio is determined by the Department of Defense to be excess to its needs, such lands shall be transferred to the jurisdiction of the Secretary for purposes of this Act [16 USCS §§ 460bb et seq.]. The Secretary shall grant a permit for continued use and occupancy for that portion of said Fort Point Coast Guard Station necessary for activities of the Coast Guard.

(g) Transfer of certain Coast Guard properties to administrative jurisdiction of Secretary; navigational aids; maintenance and operation by Coast Guard and plans for access to new installations. Point Bonita, Point Diablo[,] Point Montara, and Lime Point shall remain under the jurisdiction of the Secretary of the Department in which the Coast Guard is operating. When this property is determined to be excess to the needs of the Coast Guard, it shall be transferred to the jurisdiction of the Secretary for purposes of this Act [16 USCS §§ 460bb et seq.]. The Coast Guard may continue to maintain and operate existing navigational aids: *Provided*, That access to such navigational aids and the installation of necessary new navigational aids within the recreation area shall be undertaken in accordance with plans which are mutually acceptable to the Secretary and the Secretary of the Department in which the Coast Guard is operating and which are consistent with both the purposes of this Act [16 USCS §§ 460bb et seq.] and the purpose of existing statutes dealing with establishment, maintenance, and operation of navigational aids.

(h) Transfer of certain property of Navy Department to administrative jurisdiction of Secretary. That portion of Fort Miley comprising approximately one and seven-tenths acres of land presently used and required by the Secretary of the Navy for its inshore, underseas warfare installations shall remain under the administrative jurisdiction of the Department of the Navy until such time as all or any portion thereof is determined by the Department of Defense to be excess to its needs, at which time such excess portion shall be transferred to the administrative jurisdiction of the Secretary for purposes of this Act [16 USCS §§ 460bb et seq.]. That property known as the Pillar Point Military Reservation, under the jurisdiction of the Secretary of Defense shall be transferred to the administrative jurisdiction of the Secretary at such time as the property, or any portion thereof, becomes excess to the needs of the Department of Defense.

(i) New construction; limitation; notice and public hearing; exceptions. New construction and development within the

boundaries described in section 2(a) [16 USCS § 460bb-1(a)] on lands under the administrative jurisdiction of a department other than that of the Secretary is prohibited, except that improvements on lands which have not been transferred to his administrative jurisdiction may be reconstructed or demolished. Any such structure which is demolished may be replaced with an improvement of similar size, following consultation with the Secretary or his designated representative, who shall conduct a public hearing at a location in the general vicinity of the area, notice of which shall be given at least one week prior to the date thereof. The foregoing limitation on construction and development shall not apply to expansion of those facilities known as Letterman General Hospital or the Western Medical Institute of Research.

(j) Owner's reservation of right of use and occupancy for residential purposes for fixed term of years or for life; election by owner; adjustment of compensation; termination of use and occupancy inconsistent with statutory purposes and upon tender of sum for unexpired right; lease of Federal lands: restrictive covenants, offer to prior owner or leaseholder. The owner of improved residential property or of agricultural property on the date of its acquisition by the Secretary under this Act [16 USCS §§ 460bb et seq.] may, as a condition of such acquisition, retain for himself and his or her heirs and assigns a right of use and occupancy for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his or her spouse, whichever is later. The owner shall elect the term to be reserved. Unless the property is wholly or partly donated to the United States, the Secretary shall pay to the owner the fair market value of the property on the date of acquisition minus the fair market value on that date of the right retained by the owner. A right retained pursuant to this section shall be subject to termination by the Secretary upon his or her determination that it is being exercised in a manner inconsistent with the purposes of this Act [16 USCS §§ 460bb et seq.], and it shall terminate by operation of law upon the Secretary's notifying the holder of the right of such determination and tendering to him or her an amount equal to the fair market value of that portion of the right which remains unexpired. Where appropriate in the discretion of the Secretary, he or she may lease federally owned land (or any interest therein) which has been acquired by the Secretary under this Act [16 USCS §§ 460bb et seq.], and which was agricultural land prior to its acquisition. Such lease shall be subject to such restrictive covenants as may be necessary to carry out the purposes of this Act, [16 USCS §§ 460bb et seq.]. Any land to be leased by the Secretary under this section shall be offered first for such lease to the person who owned such land or who was a leaseholder thereon immediately before its acquisition by the United States.

(k) "Improved and agricultural property" defined. The term "improved property", as used in subsection (j), means a detached, noncommercial residential dwelling, the construction of which was begun before June 1, 1971, or, in the case of areas added by action of the Ninety-fifth Congress, October 1, 1978, together with so much of the land on which the dwelling is situated, the said land being in the same ownership as the dwelling, as the Secretary shall designate to be reasonably necessary for the enjoyment of the dwelling for the sole purpose of noncommercial residential use, together with any structures accessory to the dwelling which are situated on the land so designated. The term "agricultural property" as used in this Act [16 USCS §§ 460bb et seq.] means lands which are in regular use for agricultural, ranching, or dairying purposes as of January 1, 1978, together with residential and other structures related to the above uses of the property as such structures exist on said date.

(l) Relocation assistance benefits and rights; waiver through retention of right of use and occupancy; displaced person status of owner. Whenever an owner of property elects to retain a right of use and occupancy as provided for in the Act [16 USCS §§ 460bb et seq.], such owner shall be deemed to have waived any benefits or rights accruing under sections 203, 204, 205, and 206 of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (84 Stat. 1894) [42 USCS §§ 4623-4626], and for the purposes of those sections such owner shall not be considered a displaced person as defined in section 101(6) of that Act [42 USCS § 4601(6)].

(m) Acquisition of land; contract authority; installment payments; interest rate; provisions applicable to judgments against United States. Notwithstanding any other provision of law, the Secretary shall have the same authority with respect to contracts for the acquisition of land and interests in land for the purposes of this Act [16 USCS §§ 460bb et seq.] as was given the Secretary of the Treasury for other land acquisitions by section 34 of the Act of May 30, 1908,

relating to purchase of sites for public buildings (35 Stat. 545) [40 USCS § 3171], and the Secretary and the owner of land to be acquired under this Act [16 USCS §§ 460bb et seq.] may agree that the purchase price will be paid in periodic installments over a period that does not exceed ten years, with interest on the unpaid balance thereof at a rate which is not in excess of the current average market yield on outstanding marketable obligations of the United States with remaining periods to maturity comparable to the average maturities on the installments. Judgments against the United States for amounts in excess of the deposit in court made in condemnation actions shall be subject to the provisions of the Act of July 27, 1956 (70 Stat. 624) [31 USCS § 1304] and sections 2414 and 2517 of title 28, United States Code.

(n) Management of State donated lands. The Secretary shall accept and shall manage in accordance with this Act [16 USCS §§ 460bb et seq.], any land and improvements adjacent to the recreation area which are donated by the State of California or its political subdivisions. The boundaries of the recreation area shall be changed to include such donated lands.

(o) Payment deferral; scheduling; interest rate. In acquiring those lands authorized by the Ninety-fifth Congress for the purposes of this Act [16 USCS §§ 460bb et seq.], the Secretary may, when agreed upon by the landowner involved, defer payment or schedule payments over a period of ten years and pay interest on the unpaid balance at a rate not exceeding that paid by the Treasury of the United States for borrowing purposes.

(p) San Francisco water department property; scenic and recreational easement. With reference to those lands known as the San Francisco water department property shown on map numbered NRA GG-80,000-A, the Secretary shall administer such land in accordance with the provisions of the documents entitled "Grant of Scenic Easement", and "Grant of Scenic and Recreation Easement", both executed on January 15, 1969, between the city and county of San Francisco and the United States, including such amendments to the subject document as may be agreed to by the affected parties subsequent to the date of enactment of this subsection. The Secretary is authorized to seek appropriate agreements needed to establish a trail within this property and connecting with a suitable beach unit under the jurisdiction of the Secretary.

HISTORY:

(Oct. 27, 1972, P.L. 92-589, § 3, 86 Stat. 1299; Nov. 10, 1978, P.L. 95-625, Title III, § 317(b)-(e), 92 Stat. 3485; Dec. 28, 1980, P.L. 96-607, Title X, § 1001(3)-(5), 94 Stat. 3544.)

HISTORY; ANCILLARY LAWS AND DIRECTIVES

References in text:

The "Federal Property and Administrative Services Act of 1949", referred to in this section, is Act June 30, 1949, ch 288. Title III of such Act appears as 41 USCS §§ 251 et seq. The remainder of such Act appeared generally as 40 USCS §§ 471 et seq. prior to repeal by § 6(b) of Act Aug. 21, 2002, P.L. 107-217, which Act enacted Title 40 as positive law. For similar provisions, see 40 USCS §§ 101 et seq.

"The Act of July 27, 1956", referred to in subsec. (m) of this section, is a reference to Act July 27, 1956, ch 748, § 1302, 70 Stat. 694, which formerly appeared as 31 USCS § 724a prior to enactment of Title 31 into positive law by Act Sept. 13, 1982, P.L. 97-258, § 1, 96 Stat. 877. Similar provisions now appear as 31 USCS § 1304.

Explanatory notes:

The bracketed comma in subsec. (g) was added as the punctuation probably intended by Congress, in the amendment made by Act Dec. 28, 1980.

In subsec. (m), "31 USCS § 1304" has been inserted in brackets pursuant to § 4(b) of Act Sept. 13, 1982, P.L. 97-258, which appears as a note preceding 31 USCS § 101. Section 1 of such Act enacted Title 31 as positive law, and § 4(b) of

such Act provided that a reference to a law replaced by § 1 of such Act is deemed to refer to the corresponding provision enacted by such Act.

In subsec. (m), "*40 USCS § 3171*" has been inserted in brackets pursuant to § 5(c) of Act Aug. 21, 2002, P.L. 107-217, which appears as a note preceding *40 USCS § 101*. Section 1 of such Act enacted Title 40 as positive law, and § 5(c) of such Act provided that a reference to a law replaced by § 1 of such Act is deemed to refer to the corresponding provision enacted by such Act.

Amendments:

1978. Act Nov. 10, 1978 substituted subsecs. (i) and (j) for ones which read: "(i) New construction and development within the recreation area on property remaining under the administrative jurisdiction of the Department of the Army and not subject to the provisions of subsection (d) or (e) hereof shall be limited to that which is required to accommodate facilities being relocated from property being transferred under this Act to the administrative jurisdiction of the Secretary or which is directly related to the essential missions of the Sixth United States Army: Provided, however, That any construction on presently undeveloped open space may be undertaken only after prior consultation with the Secretary. The foregoing limitation on construction and development shall not apply to expansion of those facilities known as Letterman General Hospital or the Western Medical Institute of Research.

"(j) The owner of improved property on the date of its acquisition by the Secretary under this Act may, as a condition of such acquisition, retain for himself and his heirs and assigns a right of use and occupancy of the improved property for noncommercial residential purposes for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his spouse, whichever is later. The owner shall elect the term to be reserved. Unless the property is wholly or partially donated to the United States, the Secretary shall pay to the owner the fair market value of the property on the date of acquisition minus the fair market value on that date of the right retained by the owner. A right retained pursuant to this section shall be subject to termination by the Secretary upon his determination that it is being exercised in a manner inconsistent with the purpose of this Act, and it shall terminate by operation of law upon the Secretary's notifying the holder of the right of such determination and tendering to him an amount equal to the fair market value of that portion of the right which remains unexpired."

Such Act further, in subsec. (k), added "or, in the case of areas added by action of the Ninety-fifth Congress, October 1, 1978," and added "The term 'agricultural property' as used in this Act means lands which are in regular use for agricultural, ranching, or dairying purposes as of January 1, 1978, together with residential and other structures related to the above uses of the property as such structures exist on said date."; and added subsecs. (n) and (o).

1980. Act Dec. 28, 1980, in subsec. (g), inserted "Point Montara"; in subsec. (h), added "That property known as the Pillar Point Military Reservation, under the jurisdiction of the Secretary of Defense shall be transferred to the administrative jurisdiction of the Secretary at such time as the property, or any portion thereof, becomes excess to the needs of the Department of Defense."; and added subsec. (p).

Transfer of functions:

For transfer of authorities, functions, personnel, and assets of the Coast Guard, including the authorities and functions of the Secretary of Transportation relating thereto, to the Department of Homeland Security, and for treatment of related references, see *6 USCS §§ 468(b), 551(d), 552(d), and 557*, and the Department of Homeland Security Reorganization Plan of Nov. 25, 2002, as modified, which appears as *6 USCS § 542* note.