

16 December 2012

John Peeka
 103 Mont gomery street
 P.O. Box 29052
 San Francisco, Ca 94129



Frederic J. Silke, Jr. 12/15/12

Dear Mr. Peeka,

As a five year Presidio volunteer I continue to observe the disregard of current Presidio regulations by commercial dog walkers and dog owners. This results in threats to public safety, damage to natural resources and reductions in National Parks values.

Commercial dog walking provides no service or benefit to Park users and has not been legally permitted on any of our Parks land.

If adopted the Presidio Trust proposal will result in an increase

of commercial dog walking with increased negative impacts.

Enforcement of current regulations will control dog walking, protect natural resources, ensure public safety and hold to National Park values.

Please, keep commercial dog walking out of our National Park.

Sincerely

Freda J. Gilbert

From: [REDACTED]
To: [Pelka, John](#)
Subject: Commercial dog walkers MUST be banned from our parks
Date: Wednesday, February 20, 2013 7:31:49 PM

Mr. Pelka:

National parks/recreation areas/monuments are for the preservation and enjoyment of natural systems by the people of the U.S.. What do commercial dog walkers have to do with this? Nothing. That is, nothing but detraction and destruction.

Why are Southern California beaches strictly protected while those in and around San Francisco are daily degraded by not just irresponsible dog walkers, but now commercial dog walkers want to use this as part of their business for free! Tell these freeloading bastards to go to hell or at least back to school. This is just a power and control game with them. We don't play their childish games.

We have not fought for the paltry little of the natural ecosystems we have, to let commercial interests destroy them.

Janet Fiore

From: [Cornelia Foster](#)
To: [Pelka, John](#)
Subject: No to commercial dog walking in the Presidio
Date: Monday, December 17, 2012 10:51:13 AM

Dear Mr. Pelka,

I am a long time park volunteer and care deeply about the Presidio and it's value to our community. I'm sending you this email to let you know why i think commercial dog walking is not a good idea for Area B in the Presidio.

Already commercial dog walkers who are not approved work the Presidio and damage trails, scare people, and create clean-up costs. To open the door to more and actually sanction them doesn't make sense to me. I thought Presidio tenants couldn't have pets to protect park resources -- why let non-resident pets in via the dog walkers? They are not good for people, plants or wild animals.

Commercial dog walking has nothing to do with a National Park, and it degrades the Park experience. I urge you to keep commercial dog walking out.

Respectfully,

--Corny Foster
Park Volunteer

From: [Amy Fritz](#)
To: [Pelka, John](#)
Subject: Dog walking licenses
Date: Friday, January 04, 2013 5:16:13 PM

For this license fee I hope you will have resources to patrol and monitor dog waste from these operations. Many of the walkers come here with several dogs and do not pick up any of the dog waste. I don't care nearly as much about these other issues (Terms and conditions of the City permit include receiving training, following safe practices for dog care, having insurance, and limiting the number of dogs a commercial dog walker may walk at once to eight.) as I do about this one. This cannot be good for wildlife or our kids who want to play in the grass.

If we see a dog walker acting irresponsible in this way is there a number to call to report it? I think they bring the dogs here because it is so much easier to not pick up the feces.

Many thanks,

Amy

Amy Fritz

FRITZ DESIGN

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [Sue Fry](#)
To: [Pelka, John](#)
Subject: comment re: 36 CFR Part 1002 (commercial dog walking)
Date: Saturday, February 09, 2013 10:15:18 AM

**RE: 36 CFR Part 1002
Public Use Limit on Commercial Dog
Walking; Revised Disposal Conditions**

Dear Sir or Madam,

I am writing to state my strong support and approval for this proposed action -- as well as my concern regarding what measures will be taken to enforce this law/rule if it is passed. We currently have a leash-law throughout San Francisco -- including Golden Gate Park with the exception of designated dog-runs -- and it may as well not even exist, since it goes unenforced. This, despite the fact that in the last few years, a dog off-leash caused a mounted SFPD officer's horse to shy, throwing her to the ground, injuring her, and causing her to go on extended disability; despite the fact that a dog off-leash got into the bison herd and killed one of the bison calves that had arrived in the Park on a few weeks before and numerous other incidents where dogs have caused physical injury and property damage.

I do not wish to bore you with examples, but I will give you just this one, and hope that it will speak clearly to the seriousness of the problems that the proliferation of dog-walkers is causing-- and potentially dangerous situations they are creating:

There is a stretch of road (W. Pacific Ave) that runs for a short distance uphill between Mountain Lake Park and the Presidio Golf Course. This is a favorite spot of dog walkers (there is a designated dog-run in Mtn Lake park, just to the south of W. Pacific -- this was NOT in that area) -- who will usually have 1 or 2 dogs on the leash -- and another 1, 2 or more off-leash.

About a year ago, I was running up this road from Mountain Lake, and stopped suddenly when I was confronted with the sight of an enormous pack of dogs to the right side of the road.

I stood and counted and there were actually *twenty-nine* dogs, every one of them *off-leash*, and just 5 people. The dogs were all breeds and sizes --from labs and a German Shepherd and pit-bull mixes to small poodle mixes. All packed in right together, milling around, the people standing idly chatting with each other and laughing -- they seemed to be paying little to no attention to the dogs.

I am not a woman who gets scared -- but this scared me to the point of wondering if I felt safe walking past them. And I was stunned that people who are supposed to be "experts" on dogs seemed to have no idea that dogs are pack animals...that if one dog were to go after another, they could find themselves in the midst of a dog-fight. And also that they would be so oblivious to the fact that this was an "unstable" situation.

My question about this proposed rule or law is this: Is anyone actually going to have the authority to stop dog-walked and *cite* them or ban them from walking too many dogs in the Presidio?

Even if they do have authority and means -- who is actually going to DO it? Without enforcement, this will just be another useless piece of paper, another law that dog-owners and walkers laugh at. (If I so much as politely ask a dog owner to *call* their dog if it is running towards me, I am usually showered with a flood of four-letter words.)

Also, this proposal that you have put forth also seems much like cutting a mole off the face of someone who has breast cancer..

The far larger problem is allowing dogs to run off-leash in the Presidio and the need to address it immediately is desperate.

As far as I know, it is pretty much standard throughout National Parks that dogs must be on leash in the areas in which they are allowed -- and there are often areas where they are not.

I do volunteer work with the Park Stewards and we have had staff members injured by dogs off-leash. It is maddeningly nonsensical that we are volunteering hours and hours to strengthen and preserve natural habitat for birds and animals -- when the Presidio allows dogs -- which are natural predators to many of these animals -- to run loose throughout the Park, leaving feces, disturbing ground-nesting birds, digging up newly planted plants, scaring animals -- and visitors to the Park.

I doubt that I have to tell you that NPS employees have been injured, requiring medical treatment after being attacked by dogs that were off-leash -- sometimes after owners were asked to look after their dog, and refused.

I have owned a number of dogs in my life, like dogs and friends and family members could tell you of their dogs

who do not "warm easily" to visitors -- but who, after 5 minutes, were sitting on the sofa next to me, or in my lap, or wagging their tails as I petted them.

So I like dogs and am not generally afraid of them -- but owning a dog is not a privilege. It comes with serious responsibilities to protect the dog and to keep the dog from becoming a problem or a danger to other members of the community. Allowing dogs to run off-leash in the Presidio is truly destructive and dangerous and can undermine the massive amounts of work and money being expended to care for the native natural environment that we are working so hard to protect and restore.

That the NPS should know the potential harm and danger of this, yet refuse to do what is necessary, is inexplicable -- and shameful.

Sincerely,

Susan Fry

██████████

████████████████████

From: [John Frykman](#)
To: [Pelka, John](#)
Subject: Dog Walkers
Date: Tuesday, January 15, 2013 7:50:55 AM

The notion that these "professional" dog walkers should do so in the Presido or anywhere in the GGNRA is preposterous! They are totally uncontrolled, not generally licensed to do so, create dangerous situations between the dogs themselves and also with people. There are many of them who do not pick up the excrement left by the dogs. I've seen it near where I live on 47th Ave, 1 1/2 blocks from GGP. Talk to REC/Park people about how much trouble they are.

Sincerely,

--

John H. Frykman

[REDACTED]

[REDACTED]

P.s. I have two Corgis that I walk and take care of myself.

From: [Greg Gaar](#)
To: [Pelka, John](#)
Subject: commercial dog packs
Date: Monday, January 14, 2013 1:07:00 PM

The priority of our national parks has always been the preservation of our natural resources. Allowing packs of off leash dogs, lead by commercial dog walkers will greatly impact the biodiversity of the Presidio.

Hundreds and hundreds of dogs digging, defecating and inevitably chasing and killing wildlife will greatly degrade the health of our national park. The Presidio Trust, the National Park Service along with thousands of volunteers and staff have put years of work and millions of dollars into restoring the rich habitats of the Presidio.

With all the rare and endangered plants and othr wildlife in the Presidio, an Environmental Impact Report should be required to determine the negative environmental impacts of this ill conceived plan.

It's shocking that the dog lobby has so much political power.

Thanks
Greg Gaar

440 Hazelwood
San Francisco, CA 94118

From: [Tena](#)
To: [Pelka, John](#)
Subject: I do not think that there should be professional dog walking allowed in the Presidio.
Date: Saturday, January 12, 2013 11:40:09 AM

I do not think that there should be professional dog walking allowed in the Presidio or in any national park.

Tena Gallagher



From: [Ted Garber](#)
To: [Pelka, John](#)
Subject: Presidio dog walking
Date: Monday, January 21, 2013 11:49:04 AM

I live in Pacifica and I support professional dog walking in all areas, especially including all Federally managed properties, including Presidio and GGNRA areas. It is important to exercise and socialize our furry best friends and for many dog owners responsible professional dog walkers serve that need. Professional dog walkers improve public areas by their efforts to clean up after dogs, extra eyes that they provide improve response to problems that can occur.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Sincerely
Ted Garber

A black rectangular redaction box covering the signature area.

From: [Angela Gardner](#)
To: [Pelka, John](#)
Subject: Dog Walking in the Presidio
Date: Thursday, February 21, 2013 12:45:38 AM

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.

Angela
Sent from my iPhone



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

18 January 2013

Dear Mr. Pelka:

As a park volunteer and user I am vehemently opposed to the Presidio Trust's proposed Public Use Limit on Commercial Dog Walking.

Your sanctioning commercial dog walking runs counter to the public interest and to the future of the Presidio.

Rather, I want enforcement of the current regulations, including 36 CFR 1005.3, 1005.6, and 1005.13, to keep illicit commercial dog walking in check, protect resources, ensure public safety, reduce visitor conflict and uphold National Park values.

Normally, National Parks do not even allow dogs in their boundaries. Commercial dog walking in such a heavily used urban setting as the Presidio will adversely impact public safety, environmental and scenic values, natural and cultural resources, and conflict among visitor use activities.

Commercial dog walking provides no service or benefit to any park users and commodifies a public resource which should be shared equally by all members of the American public.

I can tell you, as a hiker and bird watcher, that dogs in San Francisco are a terrible hindrance to my outdoor recreational enjoyment. Dogs chase wildlife and damage vegetation, and have several times made me feel threatened.

Please, let me at least enjoy all the work I have invested in the Presidio.

Sincerely,



Arlene Gemmill

(Former member of the RAB; chair of Sierra Club Wetlands Committee)



From: [Samir Ghosh](#)
To: [Pelka, John](#)
Subject: Off leash
Date: Tuesday, February 26, 2013 11:15:30 AM

Mr. Pelka,

I would like to take this opportunity to convey the paramount priority I place on having quality off leash recreation areas in the Bay Area. I moved to SF in large part for its dog friendliness. Not only do I believe these areas should not be reduced (in size, access, or rights), but believe they should be expanded.

City lands were entrusted to GGNRA/NPS to operate them for city resident recreational needs, not to fit into any other NPS agenda such as operating policy standardization or catering to the special interest groups that donate the most money.

I have no dog commercial affiliations. I'm simply a dog owner with global first hand experience and believe strongly that recreation and off leash restrictions create far more problems for the community and all residents than they solve. I am happy to elaborate with anyone who will constructively listen with an open mind.

Thank you for reading my note.

Best regards,
Samir Ghosh



From: [elly gibbs](#)
To: [Pelka, John](#)
Subject: Dog Walking
Date: Saturday, January 19, 2013 10:02:39 AM

I live in Sausalito and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

We usually d our walks in Marin, but very often meet friends in the city and walk our dgs together. No matter where you live, having access to open space to let the dogs walk is a must!

Regards,
Elly Gibbs

From: [ADAM GOLDYNE](#)
To: [Pelka, John](#)
Subject: Dog Walking
Date: Saturday, January 19, 2013 10:29:42 AM

To whom it may concern:

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Adam Goldyne, M.D.



From: [Gonyaw, Chuck](#)
To: [Pelka, John](#)
Subject: Dog walker comment
Date: Monday, February 11, 2013 11:30:45 AM

John,

The Trust should get a percentage of the city's dog walker fees!

Chuck Gonyaw
Sign Tech

[REDACTED]

"I know that you believe that you understood what you think I said, but I am not sure you realize that what you heard is not what I meant."
-Robert McCloskey

From: [John Gonzalez](#)
To: [Pelka, John](#)
Subject: Professional Dog Walking
Date: Friday, January 18, 2013 1:49:48 PM

Hello,

I live in Pacifica and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

[John E. Gonzalez, EA](#)
[Enrolled to Practice Before the IRS](#)
[Visit my Website](#)

From: [Margaret Goodale](#)
To: [Pelka, John](#)
Subject: I oppose commercial dog walkers
Date: Friday, January 25, 2013 6:25:28 PM

Dear Sir,

I vigorously oppose allowing commercial dog walking in any part of our Golden Gate National Recreation Area.

Only if some small area out-lying area, in which absolutely no chance of habitat restoration is possible, could be found would dog walkers be permissible. And only if the professional dog walkers paid all the costs of maintenance, oversight, and the necessary extra law enforcement. A very, very small area in an isolated but easily accessible spot that **does not impact other visitors** in any way.

Despite the strength of the dog lobby in San Francisco, the needs and values of other residents and tax payers must be considered first. As a tax payer I do not want to contribute to subsidizing commercial dog walkers. I want to walk trails without facing a phalanx of dogs and drive and park without jockeying around commercial vehicles loading and unloading their often out-of-control charges.

Thank you for your consideration,
Margaret Goodale

From: [Kingman Gordon](#)
To: [Pelka, John](#)
Subject: Dogs in the Presidio
Date: Tuesday, February 19, 2013 9:54:48 AM

Mr. Pelka,

I'm writing on behalf of some news I recently recieved in regards to walking dogs in the Presidio moving forward.

As a former New York City (Manhattan) resident and an SF (Marina District) resident for the past 14 years, I have always enjoyed taking my dog for a walk in nearby parks. Living close to the Presidio, I am always taking Clyde (10 year old Newfoundland) up an into the park for strolls, and I hope to continue to do so moving forward.

I strongly support commercial dog walking in the Presidio as well, as it allows city residents to keep our dogs healthy and exercised during the week when we're off at work. Obviously, there are many commercial companies that operate in the Presidio, and I'd like to think that a responsible commercial dog walking company should also be aloowed to operate there as well.

I strongly oppose the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

I appreciate your help and continued thoughts about ways in which we can continue to allow dogs to enjoy the Presidio.

Best,

Kingman Gordon

From: [Nancy Graalman](#)
To: [Pelka, John](#)
Subject: re: Commercial Dog-Walking
Date: Wednesday, November 28, 2012 5:04:23 PM

John ~~~

I am not certain of where "Area B" is in relation to the discussion of new limits on dog walkers in the Presidio. Could you let me know?

ALso . . . I could not get the "full text" of the proposal to come up . . . Is the link broken?

Of course, we here around Liggett Circle, just north of the West Pacific Grove, have been Ground Zero for abuses by dog walkers with up to 10 dogs . . . and 60 unleashed dogs at a time at one point. Ann Ostrander helped us immensely, and some things have improved, but they all arrive once in a while.

Thank you.

Nancy Graalman



From: [Mary Gregory](#)
To: [Pelka, John](#)
Subject: Dog Walking regulations - comment
Date: Tuesday, February 19, 2013 9:29:29 PM

Dear Mr. Pelka,

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. What we DON'T SUPPORT is the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, or change, without public comment, any part of the commercial dog walker regulations in the current proposal. The Presidio Trust is MANDATED by NEPA (the National Environmental Policy Act) to involve the public through a participatory process before changing regulations such as these.

Thank you for listening,

Mary Gregory
San Francisco Dog Owner

From: [Ron Gutierrez](#)
To: [Pelka, John](#)
Subject: Comments - Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio
Date: Friday, February 08, 2013 8:07:49 PM

I am writing to voice my full approval for the current proposal on commercial dog walking in Area B of the Presidio. As a long time user of the Presidio trails, especially in Area B, I have noticed the numerous multiple dog walkers who utilize the Presidio trails. I find that most of these commercial walkers are courteous and considerate users of the Presidio. There are a few rare exceptions when commercial walkers leave dogs off-lease on lease designated trails but for the most part their dogs remain on lease. Individual dog walkers, however, violate the lease designation far more often than comply w/ them and I have had a number of encounters w/ dogs off-lease who should be leashed. Off-lease dogs can often be seen off trail and their owners will not venture off trail to remove their excrement. Perhaps mutual enforcement of the new commercial proposals along w/ the existing regulations can lead to more walkers in compliance w/ lease requirements and excrement removal w/in the Presidio,

Respectfully,

Ron Gutierrez



From: [Robert Hall](#)
To: [Pelka, John](#)
Subject: oppose commercial dog walking
Date: Monday, January 14, 2013 1:56:30 PM

Dear Mr. Pelka,

As a park supporter I have a keen interest in preserving park resources and upholding National Park values. I am writing to offer my comments in opposition to the Presidio Trusts proposed Public Use Limit on Commercial Dog Walking.

Illicit commercial dog walking activity within the Presidio has been responsible for damage to resources, threats to public safety, and visitor conflict. If adopted, the Presidio Trusts proposal will result in the continuance of commercial dog walking and its inherent adverse impacts. To sanction this activity and open the park up to commercial dog walking is not a reasonable, suitable, or logical remedy to the identified problems. Rather, enforcement of the current regulations, including 36 CFR 1005.3, 1005.6, and 1005.13, will keep illicit commercial dog walking in check, protect resources, ensure public safety, reduce visitor conflict, and uphold National Park values.

Commercial dog walking is not an appropriate activity for our National Park lands. Commercial dog walking will adversely impact public safety, environmental and scenic values, natural and cultural resources, and the avoidance of conflict among visitor use activities. Commercial dog walking will provide no service or benefit to any park users and will serve only for the capital gain of private enterprises at the expense of the American public.

Most sincerely,

Robert Hall


From: [Sarah Hammann](#)
To: [Pelka, John](#)
Subject: Comments on Commercial Dog Walker Proposals for Area B of the Presidio
Date: Friday, February 08, 2013 3:04:09 PM

Dear Sir/Madam,

I **support** the requirement for licenses for dog walkers in Area B of the Presidio. As a dog lover and frequent walker, I run into dog walkers daily who are unsuccessfully managing their 6-12 dogs per dog walker.

In several instances, I have experienced dog walkers not in control of their dogs. This has escalated substantially in the past few years and become a safety issue. It is now more difficult for people to ensure a safe, enjoyable walk on Crissy Field. It is common for dogs – often off leash - to run into or jump onto walkers (including seniors and children) – regardless of whether it is intentional or accidental. I’ve also seen far more wear & tear on the beach due to the many large groups of dogs being walked simultaneously.

While I love dogs, I think Crissy Field is first & foremost for people – it is not a dog park and is rapidly becoming one.

I fully support the requirement for training, following safe practices for dog care, having insurance, and limiting the number of dogs a commercial dog walker may walk at once to eight. I believe this proposal will improve visitor and dog safety and protect resources in Area B. I would also add an “on leash” requirement for dogs on the walking path and walking from the parking lots to the actual waterfront.

Regards,

Sarah Hammann



From: [Patrick Harrington](#)
To: [Pelka, John](#)
Subject: dog walking
Date: Wednesday, November 28, 2012 5:01:19 PM

As a resident of the presidio [REDACTED], I have no problem what-so-ever with professional dog walkers enjoying our wonderful space.

my dog is one of these animals which gets to participate in this while my wife and I are at work.

Sincerely,
Patrick Harrington

From: [Cindy Hawks](#)
To: [Pelka, John](#)
Subject: Dog Walkers in the Presidio
Date: Saturday, January 05, 2013 9:02:25 PM

I am sharing my comments and concerns related to dog walking in the Presidio. On numerous occasions I have encountered both commercial dog walkers and what appear to be dog owners walking their dogs off-leash on the presidio trails, and allowing their dogs to roam freely off-leash off the designated trails, or far ahead of them in the Presidio. At times I have seen dog walkers with an excessive number of dogs, up to 9, 10+ dogs at one time. My first concern is my own personal safety. Too many of these dog walkers/owners seem to have no or little concern with their dogs running up to me or others as we run or walk, and little or no concern with the dogs running with us as we run, and little or no concern that these dogs are out of their line of vision.

I find this concerning as I do not know how these dogs will behave, and see it as a safety and liability issue.

My next concern is how many dog owners or dog walkers allow their dogs to excrete on the grassy areas of the park that should be sanitary and reserved for people to enjoy. Yes, many of these people 'clean up' after the dogs, however the fecal residue and dog urine is on the grass, and is not sanitary for families or children, and essentially results in these areas becoming grassy patches for dogs, and not usable for people.

I have been troubled by the sheer number of dogs defecating and urinating on the grassy areas near the entrance of the Lombard gate by the Presidio Social Club, and the grassy areas in front of the Disney Museum, and the grassy areas at Crissy Field.

I implore the Presidio Trust to designate some of these grassy areas off-limits to dogs, so that people can sit on grass with some assurance that the grass is sanitary.

I also implore the Presidio Trust to require that dogs remain on a leash of reasonable length (to avoid lengthy leashes that pose tripping hazards for runners and walkers, and potentially put the dogs at risk) and that owners maintain more responsible control of their dogs, and for the Presidio to limit the number of dogs walked at a given time. My honest opinion is that anything beyond 3 dogs per dog walker poses a risk, and can be too much for one person to handle.

Having owned several dogs throughout my life prior to moving to the Presidio several years ago, I understand the need to exercise dogs. However, dog ownership is a big responsibility, and too many of the owners or walkers are rather indifferent to their actions, and are allowing the dogs to pose risks to people and encroach on the rights of others.

Thank you,


From: [Dylan Hayes](#)
To: [Pelka, John](#)
Subject: Considering Commercial Dog Walking...
Date: Monday, February 11, 2013 9:41:36 PM

Mr. John Pelka,

Thank you for considering the issue of commercial practices in our beloved public space.

Commercial dog walking is already a highly unregulated and pervasive infringement upon most

other park users throughout San Francisco's parks. As a private business practice it should be considered

separately from any other dog policy and use in our City's National Park.

Commercial dog walking must not only be regulated to help fund the everyday damage it causes upon

the land and user scape, it should simply not be allowed in a National Park that people from around the world

come to enjoy the natural beauty and tranquility of. There's nothing more disturbing than a commercial dog walker

yelling after a bunch of dogs (which are typically off-leash) in a place your family and friends are trying to simply

be in open space.

Thank you for your time and consideration!

The Hayes Family, Dylan, Veronica and 3 year old Isa



From: [loretta brooks](#)
To: [Pelka, John](#)
Subject: Say no to dog walking
Date: Wednesday, January 30, 2013 11:49:59 AM

Our parklands should be places of solace for all wildlife, and allowing dogs and dog walking in the Presidio is exploitive and should not be allowed. Please stop this while you can. Thank you, C. Heimstadt

From: [Pam Hemphill](#)
To: [Pelka, John](#)
Subject: Comments on Commercial Dog Walking in the Presidio/February 24, 2013
Date: Monday, February 25, 2013 9:08:16 AM
Attachments: [Comments on Commercial Dog Walking in the Presidio.docx](#)

Comments on Commercial Dog Walking in the Presidio/February 24, 2013

I am opposed to any commercial dog walking in the Presidio for a variety of reasons:

The Presidio is restoring habitat for wildlife but too many dogs put this project at risk. The Presidio is not a dog park. There are already many individuals walking a dog there and some of those individuals already do not follow leash laws or pick up dog waste.

As a senior citizen, I walk in the Presidio for the exercise and for watching the birds and mammals. The many dogs already in the Presidio present a hazard to older people and to children. About 4.7 million Americans are bitten by dogs each year per the CDC, most are children in the 5 to 9 year old range. In San Francisco many elderly people already do not go to our parks because of the many dogs, often off leash, which can knock them over.

This commercial dog walking activity does not have to do with recreation for people. The owners of the dogs brought in by the dog walkers are not actively recreating in the Presidio. They are not even in the Presidio, but are at work or at home. One person, the dog walker is bringing in a pack of dogs. Dog packs do not belong in the Presidio.

The commercial dog walkers will not have their lucrative businesses affected in any way by not being able to walk dogs in the Presidio. There are more than 32 dog parks in San Francisco and many dog walkers simply walk their dogs in the neighborhoods. Walking the dogs close to where they are picked up avoids the pollution caused by transporting the dogs across the city, and saves gas money for the dog walkers. The commercial dog walkers make a personal choice to walk their dogs in the Presidio simply because they want to be in a beautiful place. But, by their very presence, they change the experience for the rest of us and alter the environment.

Imagine trying to pick up the waste of 8 dogs. We have all seen owners with one dog failing to do so...but eight! It is very unlikely that they will do a good job of this. And, will they carry the dog waste away with them, or will it, even if bagged, become the responsibility of the Presidio for disposal.

Please save the Presidio as important habitat for the wildlife of San Francisco, and as a recreational opportunity with space for those of us without dogs.

Pam Hemphill MD

Commissioner

Animal Control and Welfare Commission, San Francisco

From: [C or J Hibbard](#)
To: [Pelka, John](#)
Subject: Commercial dog-walkers in the Presidio
Date: Saturday, December 15, 2012 7:22:23 PM

December 15, 2012

Dear Mr. Pelka,

I understand there is a proposal before the Trust to allow commercial dog-walkers to operate in Area B of the Presidio. I would like to register my objection to that proposal. I myself like dogs; but even single dogs, let alone the sometimes six or eight often escorted off leash and poorly controlled, by the professional dog-walkers, can have a significant negative impact on the plant and animal life of an undeveloped area such as the Presidio. The large packs can also create unpleasant, and occasionally dangerous, experiences for the many park users who are not fond of dogs.

The burgeoning business of dog-walking for profit, which already operates illegally in many parts of the Presidio, undoubtedly benefits those who are making money out of it, but it has no benefit whatsoever, and several drawbacks, for other users of the park. It is, in effect, the exploitation of a fragile public resource for the benefit of a few entrepreneurs. Aside from the commercial aspect, it also runs contrary to at least two of the stated goals of the Presidio Trust Management Plan:

"Open space and natural habitats will be preserved, enhanced, and increased."

"The historic forest will be rehabilitated, wetlands enhanced, and native plant and wildlife species protected."

These goals may possibly coexist, though uneasily, with private individuals walking a leashed dog or two in the park. They are completely incompatible with large packs of off-leash dogs escorted by individuals bent on making a profit from this public resource.

I strongly urge you to reject this proposal. Thank you for your attention.

Sincerely,

Charles Hibbard
[REDACTED]

From: [REDACTED]
To: [Pelka, John](#)
Subject: Keep commercial dog walkers OUT OF THE PRESIDIO
Date: Sunday, February 24, 2013 7:32:15 PM

Presidio Trust:

Those of us who served our country over 20 years (4 on the Presidio) did not serve to protect our country so greedy, disrespectful louts could destroy it just so they can feel in control. Tell these freeloaders they are banned from destroying the ecosystems of the Presidio and ALL parts of the Golden Gate Recreation Area. Already, the ecosystems of the Presidio are under seige. Tell these freeloaders to stay in the city--a city, unfortunately, which tries to make special use of the Presidio so it can save money. Tell San Francisco to build a dog-walking enclosed area.

Janet Holcomb
[REDACTED]

From: [Tony](#)
To: [Pelka, John](#)
Subject: Dogwalkers Limit Comment
Date: Wednesday, November 28, 2012 4:44:29 PM

Commenting on the dogwalking limit proposal. I'm a park user and love dogs very much, though I don't have one now. However, there are other people who get very nervous with offleash dogs running about in the parks. I personally know such a person.

I think it is a good idea to have a limit on how many can be walked at a time. The last time I was hiking on the Park Trail, a dogwalker with more than this amount was trying to supervise some that were running ahead and barking loudly while following yours truly up the trail.

Though people try to control the dogs they are walking, sometimes it is difficult to hold on to all of them if they have a larger number to look after.

I've also experienced loose dogs barking and running after me in McLaren and Buena Vista Parks. The dog in the latter park actually leaped up on me before it finally listened to its owner. So this sort of thing is not a good idea for people who are afraid of loose, barking dogs, and a smaller number would mean less problems trying to control them.

Tony Holiday


From: [Tony Holiday](#)
To: [Pelka, John](#)
Subject: No to commercial dog walkers in our parks
Date: Saturday, January 12, 2013 1:02:13 PM

I have expressed my opinion on this before. Often too many dogs are being walked at one time for their walkers to keep track of. The dogs run loose all over the place and often chase or jump up on other park users, barking, etc. and the walkers try to keep them controlled. No to the commercial walkers. Some people are nervous around dogs to varying degrees. I love them myself, but have also seen a lot of walkers with multiple dogs that are obviously not individual owners.

From: [Tony Holiday](#)
To: [Pelka, John](#)
Subject: NO to dog walking
Date: Tuesday, January 15, 2013 7:55:09 AM

Let them go to Fort Funston! Up to 8 is far too much and some people aren't fond of dogs.

From: [Christine Holmes](#)
To: [Pelka, John](#)
Subject: Commerical Dog Walking
Date: Tuesday, January 08, 2013 1:44:08 PM

Hello,

I just wanted to let you know that I support your proposed Use Limits on Commercial Dog Walking in Area B of the Presidio. I love dogs, but national parks are not meant to be dog parks. I understand that there are areas in the Presidio where residents can't have a family dog; certainly commercial dog walking is completely out of place if this is the case.

I especially hope this works:

“The Trust is proposing a rule amendment that will require all persons controlling pets to remove pet excrement and deposit it in a refuse container. This rule will apply to all individuals whether or not they are engaged in commercial activities or meet the definition of Commercial Dog Walker under the City ordinance and permit system.”

Best Wishes,

Christine Holmes

*Bay Area Air Quality Management District
Human Resources Analyst | Human Resources Office
939 Ellis Street | San Francisco, CA 94109
Office: 415.749.4938 | Fax: 415.749.4992
cholmes@baaqmd.gov | www.baaqmd.gov*

From: [Christine Holmes](#)
To: [Pelka, John](#)
Subject: No to Commercial Dog Walking in the Presidio
Date: Wednesday, January 16, 2013 1:24:10 PM

Hello,

I understand that the Presidio Trust has put forth a proposal to invite the commercial dog walking industry into Area B of the Presidio granting professional dog walkers, with up to eight dogs each, use of the Presidio's roadways, parking lots, public trails, and open spaces to conduct their business.

Under this proposal, it is estimated that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon. Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking lots, and walkers with eight dogs each will be ever-present on public trails and open spaces. The costs of administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers will be paid for by the American tax payer.

Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Keep commercial dog walking out of our National Parks.

Thank you,

Christine Holmes

*Bay Area Air Quality Management District
Human Resources Analyst | Human Resources Office
939 Ellis Street | San Francisco, CA 94109
Office: 415.749.4938 | Fax: 415.749.4992
cholmes@baaqmd.gov | www.baaqmd.gov*

From: [Vi](#)
To: [Pelka, John](#)
Subject: Presidio Trust
Date: Friday, January 18, 2013 2:04:43 PM

Dear Sir/Madam:

I live in *San Francisco district 4* and "do not" support professional dog walking service continuing in the Presidio as it is currently being commercially used for dog walking service. I am voicing my concerns as a dog guardian, public school teacher and property owner, and tax payer in San Francisco.

Though, professional dog walkers often provide much needed exercise and socialization for dogs, I have reservation in large pack encroachment in our public land areas. Therefore, I support the Presidio Trust's proposal for public use limits on commercial dog walkers in all public areas especially Area B of the Presidio because I believe in the preservation of natural habitats for future posterity. Natural resources for everyone is vital and commercial use should be well regulated.

Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians, particularly "professional dog walkers" to properly dispose of pet feces.

When I walk two dogs, I often witnessed dog walkers with large number packs (as large as 20 dogs have been seen). The ratio of dog walker to dogs is astounding and when more than one dog defecate at the same time, the dog walker is unable to locate and collect their feces for proper disposal.

Public areas such as the Presidio Trust land should not be commercialized and taken over by dog walkers. I would like to see it returned to the People and to responsible dog guardians who use it for recreational and leisurely purposes. And, I support the limit imposed on dog walking professionals to have a smaller pack not just for preserving public lands but also for the proper supervision and care of dogs.

Regards,

Vi Huynh

From: [REDACTED]
To: [Pelka, John](#)
Subject: Commercial Dog Walking Proposal
Date: Saturday, January 05, 2013 8:57:43 AM

To Whom It May Concern:

(I would prefer if my name and address be kept anonymous from public disclosure).

I am offering comments regarding the proposal to limit Dog Walking in Area B. First of all, it is my understanding that Area B of the Presidio encompasses El Polin Spring, Lover's Lane, Inspiration Point, etc.

I live on the corner of [REDACTED] and walk my dog in these areas on a daily basis. My dog is a 100lb in-tact male. He is a well-trained, champion show dog, and shows no aggression towards other animals. When we moved into the Presidio two years ago, the biggest factor in our choosing this locale was the ample access to trails to take our dog. Unfortunately, we soon learned that walking him on the trails in our surrounding area required a limit: we cannot comfortably walk our dog Monday through Friday, from 7:00am-5:00pm because of local dog walkers. You see, packs of neutered dogs are often threatened by a single in-tact male. And frankly, my dog is intimidating to neutered males. The handful of times I've taken my dog on walks during typical business hours, has resulted in encounters with dog walkers that are generally not fun.

For example, my dog and I peacefully strolled through the redwood forest along the Ecology Trail about two years ago. As we approached the turn into the forest, I began to hear the snarls and barks of...wait for it...20 dogs. I'm not kidding. I counted the dogs each walker had. The two dog walkers were standing with their dogs on leash (THANKFULLY) and we having a simple discussion. Their dogs barked loudly and aggressively towards me and my dog. It was annoying, disrespectful and frankly, obnoxious. The best part was when I heard the, "Oh, he's in tact...that's why". At that moment, I realized that sunsets would be the most comfortable time for me to take my dog out. And since then, I haven't really taken him anywhere dog walkers play during business hours. It's just easier.

Also, allow me to describe something that occurred one month ago. I was sitting in my living room, glanced outside into our parking lot and saw a dog walker pull in, park in one of the designated spots on wash ALL of his dogs in the adjacent unit's yard, using their water. The first time I saw it, I thought, "well, it's been rainy and the trails are pretty muddy. It's fine...I need to chill out". But then, it happened the next day...So, I calmly approached him while returning from a walk and informed him "we have to pay for the water so please don't use it to wash your dogs". He was very nice and apologized, and I haven't seen him since.

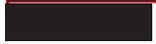
I would like to add that one dog walker, who walks around the park and down at Chrissy Field, is very respectful and her name should be noted: Sperra. I don't know the name of her business, but she always respects others on the trail(s) and knows that it is her job to control her dogs. Her dogs are very well socialized and are friendly. I've never seen her walk more than five dogs at once. She knows my name and my dog's name because she takes the time to respect those who live in the area(s) she visits.

I pay a lot of money to live here. The biggest factor in living here, and choosing this park, was the access to trails for me and my dog. We love hiking. He's an excellent hiker. He pays no attention to hikers, bikers, walkers, runners. He'll greet other dogs in a friendly manner and go on his merry way. He's the ideal dog to live in this park and visit these trails. I shouldn't have to keep him inside all day because of overuse of trails by dog walkers that abuse the privilege of visiting here.

I know this proposal won't *limit* the amount of dog walkers on a given day, but I do hope the Trust does something to *monitor/manage* the amount of dog walkers on these trails. A dog walker with four dogs or less is tolerable and manageable. Also ,they ultimately have greater control over their dogs. In

addition, it would be nice to see dog walkers utilize other trails, not the same trail day to day(Who Let the Dogs Out and Romin' Rover use the Ecology Trail all day long). Perhaps more Trust employees need to monitor the parking area when dog walkers arrive. They park at the start of the Ecology Trail near the old landfill.

*On a side note, I would like to suggest an additional waste basket somewhere along the Ecology Trail. Perhaps in the redwood forest I mentioned earlier. I have seen a lot of waste in that area, and discarded bags that are often forgotten. I think that is good place to have a waste bin. Selfishly, I would like to not carry poop of the entire trail, and often, my dog poops in that area.



From: [Annabelle Ison](#)
To: [Pelka, John](#)
Subject: new dogwalking ordinance
Date: Monday, February 18, 2013 4:15:10 PM

Dear Mr. Pelka,

Please do not adopt adopt the part of the City of San Francisco's Commercial Dog Walking Ordinance that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

Thank you.

--

Annabelle Ison



From: [Peter Jardine](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking Ordinance
Date: Thursday, February 21, 2013 8:52:59 AM

Dear Mr. Pelka,

I am a neighbor and almost daily user of the Presidio for walking my dog. The Presidio is a treasure to be treated with respect for all of us with dogs. The majority of commercial dog walkers I encounter in the Presidio are equally respectful and responsible. They provide invaluable service for dogs whose guardians are unable to provide daily recreation.

I strongly oppose the part of the proposed rule that the Presidio Trust can change San Francisco's Commercial Dog Walking permits at any time, and without public comment.

Sincerely,

Peter Jardine



From: [Bert Johnson](#)
To: [Pelka, John](#)
Subject: No!
Date: Sunday, January 13, 2013 3:26:22 PM

Please do not allow this in our national parks. Our parks should be for people, local and from far away, to enjoy walking our trails and enjoys views of water and nature without having to constantly be distracted by "dodging" both dog poop and the droves of dogs and walkers. This activity takes all the pleasure out of hiking in our national parks. Please do not be so short-sighted to appease the special interests of dog owners over the larger interests of people simply wanting to enjoy the trails, views and scenic ambience without the hassles and distractions of dogs, their excrement and the their noise (barking, etc.). A walking experience in our national parks is all about quietness, reflection of nature and the ability to enjoy it without distraction. Thank you for considering these comments in your future park plans.

From: [Bert Johnson](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walkers In Park - 2nd Comment
Date: Wednesday, February 20, 2013 9:41:00 AM

To Whom It Should Concern,

I emailed earlier, but would just like to reiterate my comments again.

Please do not allow dog walkers in this park, or in any other national park. I have nothing against dogs, but I do resent the disruptions and distractions that dog owners and their pets will often create...dogs barking...dog owners who often shout voice commands to their pets..and me having to focus on not stepping on dog poop left on the trail by discourteous pet owners. These dog-related distractions often ruin the national park experience. The national park experience should be one of peace, tranquility and a place to reflect upon the sights and sounds of nature. Please reserve the national parks solely for this purpose.

From: [Marilyn Kane](#)
To: [Pelka, John](#)
Subject: against commercial dog walking in the presidio (AREA B)
Date: Tuesday, January 15, 2013 1:15:51 PM

I am against the proposal that would allow commercial dog walkers into Area B of the Presidio. commercial dog walking has never been legally permitted on any of our National Park lands. There is no need to start it now. Commercial dog walkers have many places to take their dogs and should be able to fend for themselves.

Marilyn Kane


From: [Joan Kaplan](#)
To: [Pelka, John](#)
Subject: commercial dog walking
Date: Wednesday, February 20, 2013 10:44:54 PM

Dear Mr. Pelka,

I am a long time resident (40+ years) and home owner in San Francisco. I am also a dog owner. During the day I rely on a responsible dog walker to exercise my gentle black labrador retriever who we adopted through the SPCA after he was abandoned. I think that the Presidio is a city resource that needs to be made available to all the citizens of San Francisco and needs to abide by the laws of San Francisco which allow for regulations on dog walkers. My dog walker is licensed and responsible. I'm concerned that the Presidio Trust is proposing a rule that will allow changes from city laws without comment. Please think this through carefully and consider that the Presidio is a diverse area with multiple uses and users--dog owners and dog walkers are part of our wonderfully diverse San Francisco community. We all know that we need to work together and not create restrictions that are inflexible. The Presidio is so vibrant and well used because of both the beauty of the land but also because of the openness of the thinking about its myriad uses. Please keep this perspective in mind as you consider rules that limit its use.

Respectfully,
Joan M. Kaplan



From: [deanna kastler](#)
To: [Pelka, John](#)
Subject: Commercial dog walking
Date: Thursday, November 29, 2012 11:17:32 AM

Dear Presidio Trust:

As a resident of the Presidio for more than four years, I have become more and more upset about all the dogs in the Presidio, particularly dogs OFF-LEASH. That includes the commercial dog walkers as well as others walking their dogs in the Presidio. The Presidio is a National Park and should not be used as a venue for people making money by dog-walking. If they are allowed in the Presidio, they should be regulated and charged a fee for the use of public lands for their money-making activities.

Sincerely,
Deanna Kastler



From: [Mary Anne Kaviatos](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking Comment
Date: Tuesday, February 26, 2013 11:14:02 AM

I realize I am one day late in responding, but please consider my comments. I would very much appreciate it. I am someone who has a life threatening allergy towards dogs, and I am also really afraid of off-leash dogs. I did not see anything in this proposal to be sure that dog walkers keep the multiple dogs they walk on a leash. I tried once to take advantage of the Presidio YMCA's exercise walk through the Presidio and was terrified by all the dog walkers allowing their dogs to run off leash. When there are a group of dogs, they become a wild and uncontrollable pack and it should not be allowed.

I absolutely support the Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio.

A valid Commercial Dog Walking permit for dog walkers with four or more dogs at one time would assure that they would have to receive the proper training, follow safe practices for dog care, have insurance and limit the number to eight. Hopefully, this proposal will allow someone like me to walk through the Presidio without the threat of multiple dogs out of control.

This entire city has so many "off leash" dog parks that it is extremely limiting for people like me to go most places. I realize your proposal is not addressing the "off leash" policy that seems to be the norm around the city. However, I am very hopeful that this will be the beginning of exercising some control over the dog walker situation and the number of places that allow off leash dogs. Sometimes it feels like dogs and their dog walkers have many more rights than other residents in this beautiful city, who would like to take advantage of the abundance of natural areas and parks that we are lucky enough to have here.

I really hope that this proposal is passed. It would be a wonderful beginning.

Thank you for your consideration of my comments.

Mary Anne Kaviatos




I would really appreciate hearing about the outcome of this proposal and of any other relevant proposals. Thank you again.

From: [Lindsay Kefauver](#)
To: [Pelka, John](#)
Subject: Keep Dog Walking Recreation in the Presidio - please !
Date: Sunday, February 24, 2013 8:22:21 PM

Mr. John Pelka
The Presidio Trust

San Francisco Bay Area residents have enjoyed walking our dogs in the Presidio for generations and we want to continue to enjoy recreating with our dogs in the Presidio. Those of us who work during the day rely on commercial dog walkers to keep our dogs healthy with exercise. I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio. There are plenty of commercial companies and endeavors doing business in The Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

The Trust must designate areas for off-leash dog walking within its land. I support your plan to keep dog walking a recreation activity in The Presidio. There is no justification for removing the activity.

Furthermore, I urge you to remove the proposed rule that says The Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment. That is wrong. This is public land and the people have a right to weigh in always on usage decisions. I also disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. Statements like these have no credibility without providing evidence to support them, and anecdotal evidence cuts both ways but that is not appropriate for an environmental review.

Thank you for your consideration.

Sincerely,

Lindsay Kefauver

Lindsay Kefauver
Visual Resources



From: [Kristina Kekke](#)
To: [Pelka, John](#)
Subject: Presidio Dog Walking
Date: Friday, January 18, 2013 1:28:08 PM

I live in Cow Hollow and support professional dog walking in the Presidio of San Francisco. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City. I walk my own dog there several times a week.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also very much support ALL regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Kristina Kekke

From: [Lynn Keller](#)
To: [Pelka, John](#)
Subject: Dog Walking in Areas A and B of the Presidio Trust
Date: Monday, February 18, 2013 1:27:56 PM

Dear Sir:

I have had a business in San Francisco - employing over 20 individuals, for 23 years. I chose to locate my business in San Francisco for many reasons - and one important reason is the dog friendly atmosphere of San Francisco. In that regard I provide my comments on Dog Walking in Areas A and B of the Presidio Trust.

- I and many of our employees have enjoyed working our dogs in the Presidio for 23 years - and hope to continue to do this in the future.
- I completely support continued dog walking in the Presidio - including commercial dog walking - and the Presidio Trust adopting the City of San Francisco's new commercial dog walking ordinance.
- Commercial dog walking supports our residents having healthy and socially developed dogs - especially in a city where most families have two working individuals which means most dogs couldn't get outside for 10 - 12 hours a day without a commercial dog walker.
- The Presidio and GGNRA host many other commercial activities and businesses - why would commercial dog walking not be included? It is equally needed as the 'House of Air', 'Planet Granite', RMCA, SF Psychotherapy Group and more.

I also strongly oppose the part of the proposed rule that says the Presidio can change the City of San Francisco Ordinance governing Dog Walking permits at any time without public comment.

The City of San Francisco has a long history of supporting healthy human canine relationships. The City of San Francisco recognizes the importance of the canine human bond - and the role of exercise in having healthy well adjusted dog partners in our lives.

I hope this is a first step in the Presidio Trust finally adopting more canine inclusive policies in keeping with San Francisco's long held position on the importance of dogs in an urban environment.

Dogs need space to recreate unhindered.
And we need our dogs.
Our dogs make us better people.

Thank you for your consideration.
Lynn Keller



From: [Kai](#)
To: [Pelka, John](#)
Subject: Save Off-Leash Dog Walking Areas in the SF Bay Area
Date: Thursday, February 21, 2013 9:17:23 AM

I am a San Francisco resident of voting age and I support saving the dog walking areas.
Thanks,
Kai

From: [Peter Kupfer](#)
To: [Pelka, John](#)
Subject: Dogs Walking in the Presidio
Date: Thursday, February 21, 2013 9:37:14 AM

Dear John,

I own a 5-year-old Lab and we enjoy walking in many different areas of the Presidio. Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to do so. Commercial dog walking in the Presidio has also been going on for decades. It allows us to keep our dogs healthy and exercised during the week when working. As you know, there are many other commercial activities going on in the Presidio, including Letterman Digital Arts Center, Sports Basement, the House of Air Trampoline Park, etc.

I oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment. That is undemocratic!

Thank you,

Peter Kupfer

.....

Peter Kupfer



From: [Norman La Force](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking in the Presidio
Date: Saturday, January 12, 2013 2:14:03 PM

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

Dear Mr. Pelka,

As a park supporter I have a keen interest in preserving park resources and upholding National Park values. I am writing to offer my comments in opposition to the Presidio Trusts proposed Public Use Limit on Commercial Dog Walking.

Illicit commercial dog walking activity within the Presidio has been responsible for damage to resources, threats to public safety, and visitor conflict. If adopted, the Presidio Trusts proposal will result in the continuance of commercial dog walking and its inherent adverse impacts. To sanction this activity and open the park up to commercial dog walking is not a reasonable, suitable, or logical remedy to the identified problems. Rather, enforcement of the current regulations, including 36 CFR 1005.3, 1005.6, and 1005.13, will keep illicit commercial dog walking in check, protect resources, ensure public safety, reduce visitor conflict, and uphold National Park values.

Commercial dog walking is not an appropriate activity for our National Park lands. Commercial dog walking will adversely impact public safety, environmental and scenic values, natural and cultural resources, and the avoidance of conflict among visitor use activities. Commercial dog walking will provide no service or benefit to any park users and will serve only for the capital gain of private enterprises at the expense of the American public.

Commercial dog walking has not been permitted in other national parks. Moreover, the proposal to allow up to 8 dogs per walker would mean that many trails and areas would be overrun with dogs forcing other uses off the trails or to other trails and areas. Please do not approve this use.

Sincerely yours,
Norman La Force

From: [Cheryl Lazar](#)
To: [Pelka, John](#)
Subject: Dogs in the Presidio
Date: Thursday, February 21, 2013 11:53:37 AM

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.

Cheryl Lazar
PARAGON REAL ESTATE GROUP



From: [Enid Leff](#)
To: [Pelka, John](#)
Subject: dog walkers
Date: Saturday, February 09, 2013 11:26:18 AM

I was glad to learn of the new rules for commercial dog walkers. I hope the requirements include the use of solid paths only and no dogs on the grass, (even less than seven dogs) and, of course, cleaning up after the dogs, if necessary. Will there be containers for dog trash along the way? I've seen those in other parks and they are very useful.

Thank you. Enid Leff
 San Francisco

From: [REDACTED]
To: [Pelka, John](#)
Subject: Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio
Date: Saturday, December 01, 2012 10:15:58 PM

Dear Mr. Pelka:

I am for the proposed public use limit on commercial dog walking in Presidio's Area B. As a resident of San Francisco who lives near the Presidio, I am tired of having my Presidio walks spoiled by those who cannot or will not take responsibility for the animals in their charge.

My only concern about this proposal is: how will it be enforced? Will Park Service rangers have the ability to cite dog walkers who are out of compliance with the new regulations? I would be ok with this, I just want to make sure that the new proposal can and will be enforced!

Thank you in advance for considering my comments.

Sincerely,

Adrienne Leifer

[REDACTED]

From: [REDACTED]
To: [Pelka, John](#)
Subject: Presidio Trust New Rules For Dog Walking
Date: Thursday, February 21, 2013 11:25:03 AM

John,

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

I hope you will take all of this into consideration.

Thank you,
-Rob
(Crissy Field Dog Group Member)

From: [REDACTED]
To: [Pelka, John](#)
Subject: NO PROFESSIONAL DOG WALKERS IN SAN FRANCISCO'S PRESIDIOo, PLEASE ... THE HUNDREDS OF DOGS WOULD RUIN BOTH THE ENVIRONMENT AND THE ENJOYMENT OF THE PRESIDIO.
Date: Saturday, January 12, 2013 1:37:06 PM

Dan Liberthson and Kathy Rawlins



From: [Donald Lim](#)
To: [Pelka, John](#)
Subject: Professional Dog Walking
Date: Friday, January 18, 2013 5:24:07 PM

I live in *South San Francisco* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,
Donald Lim

From: [Saw Lim-Skain](#)
To: [Pelka, John](#)
Subject: No to Commercial Dog Walkers
Date: Thursday, January 31, 2013 10:00:58 AM

Dear Mr. Pelka: I write in opposition to any plan that allows commercial dog walkers greater access to the Presidio. In all frankness, I must ask if members of the Presidio Trust have lost all sense of your basic mission and true responsibility? We are dealing with a national treasure; and as such, any choices you make should benefit the widest possible user base and protect the natural resources of the park. Commercial dog walkers represent a narrow and self serving interest group. No amount of money will compensate for the negative impacts this activity will cause. In my experience, dogs are like second hand smoke. For most of my lifetime, I was required to just put up with it. Now, the time has come to confine, control and end it. I feel the same way about off leash dogs and commercial dog walkers. Just say NO to commercial dog walkers. Please save the Presidio so it is a source of joy and inspiration for all its visitors. Thank You. Saw Lim-Skain.

From: [Jennifer Lively](#)
To: [Pelka, John](#)
Subject: professional dog walking in the Presidio
Date: Tuesday, January 22, 2013 12:51:49 PM

I live in Presidio Heights in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide a needed exercise and socialization for responsible, safe and humane dog care. Well cared for dogs improve the health, safety and well being of the people that live in the city.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Sincerely,
Jennifer Lively

From: [Thomas Lloyd-Butler](#)
To: [Pelka, John](#)
Date: Wednesday, February 20, 2013 8:31:34 AM

Dear Sir,

I'm writing against your proposed rules for dog walking in the Presidio.....your organization is like a gestapo....putting into effect rules which nobody supports, cares about or needs! STOP IT!!!!!!!

Specifically:

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. What we DON'T SUPPORT is the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, OR change, without public comment, any part of the commercial dog walker regulations in the current proposal. The Presido Trust is MANDATED by NEPA (the National Environmental Policy Act) to involve the public through a participatory process before changing regulations such as these.

Thomas Lloyd-Butler



heil hitler.

From: [Marisa Lo](#)
To: [Pelka, John](#)
Subject: The Presidio Trust
Date: Thursday, February 21, 2013 10:05:03 AM

Dear Mr Pelka,

I am writing to you in regards to the changes proposed to Area B of the Presidio, which the Presidio Trust is responsible for. Please see below my point of view on this matter.

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.
4. We disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. The Trust cannot make statements like that without providing evidence to support them, and anecdotal evidence does not count.

Kind regards
Marisa Lo

From: [Melanie Loftus](#)
To: [Pelka, John](#)
Cc: [Jarrett Streebin](#); [Jan Mills](#)
Subject: Please continue to allow off-leash recreation in the Presidio
Date: Thursday, February 21, 2013 3:12:27 PM

Hello John,

I am a dog owner and lover of the Presidio (I live in Pacific Heights and go to the Presidio all the time). I also have a dog walker who often takes a group of dogs to various parts of the city for exercise, including the Presidio, while I am at work.

First, I would like to emphasize my support for continuing to allow dogs off leash throughout the Presidio, whether with their owners or with commercial dog walkers. I am always careful to keep my dog off sensitive sites, such as newly planted areas or marked habitat, and I just like the freedom of letting my dog get the extra exercise of being off-leash. It is crucial that my dog get the same access with my commercial dog walker while I am at work. Please continue to allow this sort of recreation.

I also oppose the rule saying that Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment. This makes no sense and sets the Trust up for making closed-door decisions. I am currently on the waiting list to live in the Presidio, and I would hate to move there only to find that the rules have been changed without my input.

Finally, I disagree that dogs cause damage to the environment. You have to remember that we are in a city with more dogs than children, and it is not fair to make such assertions without hard evidence showing that this is the case. It seems to me that the major player in our environmental damage has to do with the people in this city, not our dogs.

In fact, I believe that my dog-owning friends are much MORE environmentally aware than my non dog-owning friends. To bar us from recreating in the Presidio would be counter-productive. I take great interest in all the restoration work the Presidio is doing, and often while walking my dog, I stop to read about the various projects going on, as well as the history of the place. Without engaging actively interested citizens like myself, the Presidio Trust is shooting itself in the foot.

Thank you for taking my email into consideration today, and please continue to allow off-leash recreation in the Presidio.

Melanie Loftus



From: [David Long](#)
To: [Pelka, John](#)
Subject: Do not open the Presidio to commercial exploitation by professional dog walkers
Date: Saturday, January 12, 2013 4:24:41 PM

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

I am writing to express strong opposition to the Presidio Trust proposal to permit commercial dog walkers to use Area B of the Presidio National Park. Making 80% of the Presidio a commercial dog walker destination would degrade the experience of the Park for citizens such as myself. It is hard enough to police whether pet owners pick up and properly dispose of their dog's feces. To add to this the near impossible task of policing the pet excrement from an exponentially larger number of dogs roaming the park in packs of 8 will make the Presidio an unattractive place for me and many others to visit. As an active member of the California Native Plant Society, I have frequently noted with approval and visited the efforts that are being made to restore much of the native vegetation to the Presidio. Inviting commercial dog walks to use the park as an exercise and defecation venue would be directly contrary to the laudable efforts underway to restore the Presidio's biodiversity. Approval of this proposal would put the interests of commercial dog walkers ahead of the interests of all the other persons who use the park.

David C. Long



From: [Denise Louie](#)
To: [Pelka, John](#)
Subject: NO to dog walkers
Date: Sunday, January 13, 2013 11:12:09 AM

Dear John and The Presidio Trust,
Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Let's *not* set this precedent. I do not like dogs or dog walkers. They scare me and ruin the peace I seek in our parks.

Thank you,
Denise Louie
San Francisco native, resident, taxpayer, volunteer

Liza Lozovatskaya
[REDACTED]

February 25, 2013

Presidio Trust
103 Montgomery Street
San Francisco CA, 94129

Re: Comment on Proposed Rule 36 CFR Part 1002

To Whom It May Concern:

I would like to express my support for proposed rule 36 CFR Part 1002, Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions. I would also like to thank Clay Harrell for meeting with me to discuss the impetus and reasoning behind the proposed rule.

As an avid runner, I visit the Presidio on a weekly basis. I very much appreciate the steps that the Presidio Trust has taken to preserve the park's beauty, natural resources and unique wildlife. As a native San Franciscan, it is very important to me that the Presidio continues to grow, prosper, and remain preserved for future generations to come. As such, my biggest concern regarding the proposed rule is the effects that a large number of dogs could have on the Presidio's fragile ecosystem. However, Mr. Harrell adequately addressed my concern. I was happy to hear that the Presidio Trust has worked closely with the City of San Francisco to create a uniform permit system for all commercial dog walkers throughout San Francisco County. Mr. Harrell explained that under the new rule, dog walkers will be held to the same standards in the City of San Francisco as in the Presidio, and as such, they will not favor walking their dogs in the Presidio over the city. Consequently, this decreases the risk of higher dog walking traffic in the Presidio, and avoids a potential cause of resources destruction. I was very happy to hear this.

I would also like to express some, limited concern regarding dog walking regulations in the areas of the Presidio managed by the National Park Service, in particular Crissy Field. I understand that this proposed rule does not apply to this area of the Presidio, and I hope that whatever dog walking regulations will be implemented they will be at least as stringent as those in the current rule. To the extent that the Presidio Trust has an impact on those regulations, it is important to me that the natural beauty of that area of the Presidio be just as strictly protected.

Thank you very much for your time and consideration. If you have any questions I can be contacted by e-mail at [REDACTED]

Sincerely,

Liza Lozovatskaya

From: [Mark Maberley](#)
To: [Pelka, John](#)
Subject: No commercial dog walking in Presidio!
Date: Tuesday, February 19, 2013 1:41:54 PM

Just Say No!!!!

From: [Karen Melander Magoon](#)
To: [Pelka, John](#)
Subject: Keep professional dog walking out of our parks!!!! Thanks and Happy New Year
Date: Saturday, January 12, 2013 2:56:17 PM

Karen Melander Magoon, D.Min.

[REDACTED]

From: [John Manning](#)
To: [Pelka, John](#)
Subject: no commercial dog walkers in Presidio, PLEASE
Date: Tuesday, January 15, 2013 4:12:59 PM

Dear Mr. Pelka,

As a very long-time San Francisco resident and likewise frequent visitor to our precious Presidio, I want to register my opposition to the ill-advised proposal to open to professional dog walkers this space of refuge from exactly such things as them.

Thank you and whoever will ultimately make this decision for considering my views --

John Manning

John R. Manning

MANNING BUSKE FORENSICS

[REDACTED]

[REDACTED]

From: [Ed Marwitz](#)
To: [Pelka, John](#)
Subject: I Support Professional Dog Walking in the Presidio!
Date: Friday, January 18, 2013 2:31:45 PM

Hi,

My wife Noel and I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

We live within walking distance of the Presidio and enjoy the fact that I can share it with my favorite four legged friends... and their wonderful caretakers! We have spent many years enjoying the Presidio and its trails with our dog Sam and look forward to it continuing to be a welcome place for our dogs in the future.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,
Ed Marwitz

Ed Marwitz

[REDACTED]
[REDACTED]

From: [Sharon McMahon](#)
To: [Pelka, John](#)
Date: Friday, January 18, 2013 8:34:01 PM

I own a home in the Cow Hollow area of San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City. Unless they have regular exercise and exposure to other dogs we will all have a problem.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Sharon McMahon



About the Author: This e-mail is authored by Arnita Bowman, who enjoys the GGNRA and Bay Area parks with her family, including the family dog, and is a member of several Bay Area organizations that are working to preserve open-spaces for all people, including those that enjoy both on-leash and off-leash dog recreation.

Cancellation: To be removed from this email distribution, please respond to saveoffleashdogs@gmail.com with "Cancel" in the subject line. Thank you for your support in keeping the Bay Area people and dog-friendly.

Sent from my iPhone Sharon McMahon

From: [Sharon McMahon](#)
To: [Pelka, John](#)
Subject: Dogs in the Presideo
Date: Wednesday, February 20, 2013 8:40:16 AM

Dear Mr. Pelka;

I am a concerned dog and home owner in the Cow Hollow area. Please consider my following comments on the requests I have for dog walkers and dog owners in San Francisco.

I also own a home in Sonoma where the dog leash rules are quite stringent and very few dogs get out of there backyard. When walking in public areas, they are so much more aggressive than our dogs here in SF. Their socialization skills are so important to fewer incidents in our community. Here are my requests:

- 1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.*

- 2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).*

- 3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.*

*Thank you
Sharon McMahon*



From: [Amy Meyer](#)
To: [Pelka, John](#)
Subject: Commercial dog walking
Date: Sunday, February 24, 2013 8:44:43 AM

To the Presidio Trust:

Comments with regard to **Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions**

It is understandable why the Presidio Trust wants to make sure that when the City of San Francisco commercial dog walking (CDW) regulations go into effect the Presidio will not experience a rush of large groups of dogs walked by vendors who preferred not to buy a city permit.

However, the city's limitation on the number of dogs— 4-8 with one handler— is larger than the one proposed by the NPS: more than 3 and no more than 6. Also, the NPS expects to create a separate permit for the national park lands. I do not think it is a good idea for the Presidio Trust get into a two-stage process where it allows the dogs with city permits and a larger number of dogs than the Trust has expressed that it really wants: the NPS 3-6 limitation— and then later to set a different limit and also to require a different permit.

In many ways, the federal park lands are distinctly different from those of the city and the intentions in saving these lands for public use are also different. The CDWs are a city matter. If the national park makes room for them it is entitled to set a standard that will meet the legislated intention of preserving the natural, historic, scenic, and recreational resources of the Golden Gate for public education and recreation. These lands are visited by people from all over the nation and the world. Also, management of these lands has to be considered in relation to the other 398 national park units not only meeting some needs of city residents.

It would be much better for the two federal agencies to come out together with one system clearly defined. I hope it will be possible for the NPS to get the CDW issues separated from the Special Rule Making for all dogs that is near the end of its process but will still take some time. Even if that does not happen, it would be better to endure a few months of too many dogs than to have to backtrack on numbers and possibly require vendors ultimately to get two permits. Simplicity and no changes is best in this kind of situation.

The lower number of dogs permitted on the national park lands will ultimately place an unpopular limitation (to the CD Walkers, not anyone else) on those lands, but at least the Trust will not be accused of some sort of double-dealing, with some bad PR as a result.

What is missing from the Federal Register notice is a sense of where on the Presidio the CDWs can take their charges. Surely we do not want them on the lawns of the Main Parade and Old Parade, for example— nor do we want family pets there. To come by on a Sunday and see people using the lawns for picnics and frisbee is a most welcome sight and no matter how careful a CDW or owner is, there will necessarily be the leavings of urine and feces that no one coming for that sort of enjoyment should have to contend with. For the purposes of any CDW announcement, I think it is important that some definition be given of where the

CDWs can go. I think that would best be worked out collaboratively with the GGNRA so there are a few agreed-upon places in each jurisdiction and they are barred from any others. That is another reason for making a joint announcement.

Concerning the excrement disposal requirements of this notification, I think they are well expressed

Amy Meyer

From: [Lynn Miller](#)
To: [Pelka, John](#)
Subject: Presidio
Date: Thursday, February 21, 2013 8:12:24 AM

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.

Lynn Miller

From: [sandra miller](#)
To: [Pelka, John](#)
Subject: Re: Area B (Re: Proposed Public Use Limit on Commercial Dog Walking)
Date: Friday, January 18, 2013 11:36:43 AM

Thank you John
I have noticed some areas of degradation where lots of dogs run. The dogs look happy. But perhaps the ground becomes a little less stable so the trees are probably less happy.
Sandra

Sent from my iPhone

On Jan 18, 2013, at 9:41 AM, "Pelka, John" <JPelka@presidiotrust.gov> wrote:

Dear Ms. Miller-

Thank you for your interest in our proposed public use limit on commercial dog walkers. Area B is the inland portion of the Presidio managed by the Trust; Area A is the coastal area under NPS jurisdiction (see attached map).

Best,

John

JOHN PELKA
COMPLIANCE MANAGER

THE PRESIDIO TRUST
103 Montgomery Street
P.O. Box 29052
San Francisco, CA 94129

☎: 415.561.5365

✉: jpelka@presidiotrust.gov

<Area B.pdf>

From: [Karen Misuraca](#)
To: [Pelka, John](#)
Subject: dogs in the Presidio
Date: Friday, January 04, 2013 6:12:58 PM

Dogs don't belong in the Presidio at all--I've seen many dogs off-leash in the park. People in big cities need to keep their dogs to themselves, not destroy habitat and landscaping and harrass wildlife and people.
KM

From: [Melissa Montgomery](#)
To: [Pelka, John](#)
Subject: Support for Professional Dog Walking in the Presidio
Date: Friday, January 18, 2013 2:05:48 PM

I live in San Francisco and believe that professional dog walking should be allowed in the Presidio. It is very important for dog owners to have access to professional dog-walking services to provide exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,
Melissa

Melissa Moran
Managing Partner
West Group Real Estate, Inc.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [Melissa Montgomery](#)
To: [Pelka, John](#)
Subject: Presidio Trust - New Rules for Dog Walking
Date: Monday, February 25, 2013 10:14:36 AM

Dear Mr. Pelka,

I am a San Francisco resident and dog owner. I strongly support the rights of dog owners to enjoy off leash recreation with their dogs at the Presidio. Furthermore, I believe the lawn on the main post should be an off leash dog area.

I also urge you to support commercial dog walking in the Presidio. It is vital to working dog owners that their dogs are able to get exercise during the day. I oppose the portion of the proposed rule that allows the Presidio Trust to change the Commercial Dog Walking regulations at any time without further public comment.

Sincerely,
Melissa Montgomery

Melissa Montgomery
Managing Partner
West Group Real Estate, Inc.



Jim Morrell



January 11, 2013

Mr. Frank Dean
General Superintendent
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123-0022

Re: Commercial Dog Walking

Dear Mr. Dean:

This is to advise you of my opposition to commercial dog walking anywhere in the GGNRA. Accordingly, I also oppose the Presidio Trust's proposed Public Use Limit on Commercial Dog Walking. This stems from my vested interest in maintaining the natural beauty of GGNRA, as a volunteer with the Habitat Restoration Team in Tennessee Valley the past six years.

As you know, commercial dog walking activity has been responsible for damage to natural habitat and threats to public safety throughout the GGNRA, including the Presidio and Fort Funston. Such activity provides no benefit to any park visitors, serving only to put money in the pockets of private business at the expense of the American public.

The Presidio Trust proposal, which requires permits for commercial dog walking, will result in the increase of this activity and degrade the beauty of GGNRA. On the other hand, enforcement of current laws will keep illicit commercial dog walking in check.

Commercial dog walking is not an appropriate activity for National Park lands, which have been established to provide quiet, uncluttered views and landscapes. Thank you for your consideration in taking steps to end this disruptive business activity in the GGNRA.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Pelka', written over the word 'Sincerely,'.

cc. John Pelka, Compliance Manager, The Presidio Trust
Greg Moore, President & CEO, Parks Conservancy

From: [Beth Moseley](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking Comment
Date: Wednesday, February 20, 2013 5:06:45 PM

Hi John:

I just wanted to weigh in before the end of the comment period regarding commercial dog walking in the Presidio.

I am very much against this use of the beautiful space in the Presidio. I believe the City and County of San Francisco goes out of its way to accommodate commercial dog walkers (and dog owners for that matter) with an abundance of areas for their use in the City's parks.

No matter how well behaved the large group of dogs may be I feel that their presence is not aligned with the experience that a visitor to our national park should have. Our precious National Parks - especially our Presidio gem - is no place for commercial dog walking.

Thank you for allowing me to voice my opinion on this matter.

Beth Moseley



From: [Sharon Muczynski](#)
To: [Pelka, John](#)
Subject: No to opening Presidio to dog walkers!
Date: Saturday, January 12, 2013 11:20:57 AM

Mr. Pelka,

Please do not allow dog walkers with all their dogs to walk in the Presidio.

Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan. All those dogs will destroy habitat.

Best Regards,
Sharon Muczynski LEED® AP



From: [Lani Mulholland](#)
To: [Pelka, John](#)
Subject: Professional dog walkers
Date: Tuesday, January 15, 2013 10:34:48 AM

Stop this plan. I do not want professional, for-profit dog walking in our public parks. We diaper our children. Until dog users show the same courtesy, they do not deserve to parade their toxic waste spewing creatures in, of all places, a National Park.

Lani Mulholland


From: [Patricia Murino](#)
To: [Pelka, John](#)
Subject: Support Professional Dog Walking in the Presidio
Date: Friday, January 18, 2013 6:20:17 PM

Hello,

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City. I'm sure many of your donors own dogs and support dog walking in the Presidio.

Sincerely,
Patricia Murino

From: [Mouse Naboo](#)
To: [Pelka, John](#)
Subject: Oppose a new measure to "regulate" dogwalking and ban dogs use in the Presidio
Date: Thursday, February 21, 2013 11:10:49 AM

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.

From: [David Nale](#)
To: [Pelka, John](#)
Subject: Presidio Trust new rules for dog walkers in Area B
Date: Wednesday, February 20, 2013 1:23:03 PM

I understand there will soon be a hearing about adopting new rules for dog walkers in Area B of the Presidio.

I support the idea of adopting the City of San Francisco laws that regulate dog walkers to eight dogs and impose other regulations already approved by the city.

I absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.

Thank you for keeping the Presidio open for enjoyment by those with both two and four legs.

Sincerely,
David Nale



From: [Nelson, Chuck](#)
To: [Pelka, John](#)
Cc: [Kathryn McGeorge](#)
Subject: Support for Presidio Dog Walking:
Date: Wednesday, January 23, 2013 10:17:51 AM

Mr. Pelka,

I am writing in support of professional dog walking in the Presidio. My wife and I have a 5 year old Border Collie who regularly visits the Presidio with her pack under the supervision of a professional, licensed dog walker. Having access to large open areas such as the Presidio is a critical part of providing for our high energy breed.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,
Chuck Nelson & Kathryn McGeorge



From: [David Nelson](#)
To: [Pelka, John](#)
Subject: Comments on dog walkers proposal
Date: Friday, February 08, 2013 9:26:44 PM

Dear Mr. Pelka,

I am writing to support this first small step to control the number of dogs in the Presidio and how they are handled. While the commercial dog walkers have certainly made the Presidio "San Francisco's doggie toilet," it is the individual dog owner that is more inclined to walk the dog off leash and leave feces uncollected. Individual dog owners more often believe that their dog is well behaved, under voice control, and doesn't poop, when, in fact, none of this is true.

So this proposal is a little bit like "singing to the choir" ...while the church is burning down. Hope that metaphor isn't too obscure.

Sincerely,
David J. Nelson
Presidio resident and avid park user

From: [mcnicholson](#)
To: [Pelka, John](#)
Subject: Commercial dog walking
Date: Wednesday, February 20, 2013 11:00:50 AM

I love dogs. I also love our parks. Please NO COMMERCIAL DOG WALKING
IN THE PRESIDIO.

Mary Nicholson

From: [Anne Odriscoll](#)
To: [Pelka, John](#)
Subject: Let the dogs be!
Date: Thursday, February 21, 2013 10:51:54 AM

Please leave the dog walkers alone! The dog walkers do a great job of maintaining control of their packs. Arbitrary dog limits with no backup documentation serves no purpose! I walk my son and dog on a daily basis in both Areas A and B of the presidio and have for my entire life. Stop blaming dogs for all management issues!

Sincerely, Anne and Alexander and Zoe ODriscoll

Sent from my iPhone

From: [Cristin Pescosolido](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking comment
Date: Friday, February 08, 2013 2:49:26 PM

I wholeheartedly support a public use limit on commercial dog walkers, but I feel that dog walkers with three or more dogs should be required to have a permit, and to be able to have no more than six dogs at once in all sections of The Presidio, not just Area B, but I don't know if The Presidio Trust has control over other areas. I also would support a "no dogs off leash" ruling to be formalized.

Thank you for your time!

--

cristin pescosolido


From: [Charles Pfister](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking -- Comments are due by January 25, 2013
Date: Thursday, January 24, 2013 9:26:32 PM

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

Dear Mr. Pelka:

I was shocked to hear that the Presidio is considering approving commercial dog walking in Area B of the Presidio. Have you read the thousands of pages of complaints and incident reports generated by off-leash dogs in GGNRA?

Although I am familiar with studies of the impact of dogs on wildlife (see for example Lenth et al. 2008) and have published research related to the impacts of human disturbance, including dogs, on wildlife (Pfister et al 1992), I am confining my remarks to you about the impact of off leash dogs on the experience of visitors to the Presidio.

Various subgroups of visitors have extraordinary safety concerns because of off-leash dogs, including: 1) the elderly; 2) visitors with young children; 3) blind and disabled visitors; 4) various minority groups; and 5) visitors who suffer from fear of dogs because of previous experiences or for other reasons. For many in these groups, an off-leash dog area may represent a flat out "no go" area. For visitors who do not necessarily have extraordinary safety concerns, the impact on their visiting experience due off-leash dogs can also be strong enough to displace them from off-leash areas. Off-leash dogs can completely destroy the quality of this experience for many visitors.

A study of visitor experience related to dogs in open space areas in Boulder, CO (Vaske & Donnelly 2007) indicated that a significant proportion of visitors to open space areas reacted strongly to negative behavior associated with off-leash dog walking . A total of 951 visitors, both dog owners and non-dog owners, completed questionnaires regarding their attitudes towards potentially disruptive behavior by dogs. Those dog behaviors were classified as "direct" and "indirect" and were as follows:

Direct behaviors:

- Dogs jumping on a visitor (60%)
- Dogs pawing a visitor (50%)
- Dogs licking a visitor (35%)
- Dogs sniffing a visitor (23%)
- Dogs approaching uninvited (36%)

Indirect behaviors:

- Owners not picking up after their dogs (79%)
- Dogs causing wildlife to flee (57%)
- Dogs flushing birds (46%)
- Owners repeatedly calling their dogs (31%)
- Dogs off trail (18%)
- Dogs “play” chasing another dog (18%)

Respondents were asked about their attitudes towards experiencing those behaviors in open space area. The percentage for each category listed above indicates the percentage of respondents who felt the behavior was a “moderate” or “extreme” problem if it occurred during visitation. Additional analysis of the data indicated that for 9 of the 11 behaviors visitors indicated “no tolerance” norms even for only one occurrence of the behavior. Such a result can be interpreted to mean that the given behavior is unacceptable and there is no tolerance for the behavior if encountered by visitors. The results of the study by Vaske & Donnelly (2007) suggest that the negative behaviors many visitors associate with dogs are not simply minor irritants but could potentially spoil the entire experience for the visitor.

The presence of off-leash dogs affects the park carrying capacity. Carrying capacity is the level and type of recreation use that can be accommodated in a park without violating standards for relevant indicator variables (Manning 2007, p. 25). In terms of the indicator of visitor experience, different user groups probably have widely different tolerance levels of the presence of dogs off-leash. The stratified results of the GGNRA 2002 Survey of attitudes towards leash laws undoubtedly reflect such differences.

A quantitative study by Arneburger et al. (2004) showed that the presence of off-leash dogs in an urban park made a remarkable difference in the degree of tolerance of visitors for crowding in the park. The presence of off-leash dogs decreased the tolerance of visitors to social conditions such as crowding. A certain degree of crowding of visitors that might be acceptable with few or no dogs off-leash became unacceptable when many visitors had dogs off-leash.

Anywhere in the Presidio where dog walkers and other visitors congregate, the potential exists for visitor tolerance of crowding to be exceeded due to synergistic impacts of off-leash dogs, social crowding, safety concerns, and many other factors. Although there are no studies specifically addressing the idea of carrying capacity in the Presidio, the results of the 2002 GGNRA survey should provide some clues as how certain user groups may view carrying capacity and may be displaced from off-leash dog areas.

The fact that commercial dog walking potentially excludes many user groups and a large proportion of potential visitors must be explicitly discussed in its ramifications for the recreational mission of the Presidio.

Although actual attacks involving dogs biting and knocking down visitors may be relatively infrequent, any exposure to off-leash dogs potentially involves considerable risk. Certain user groups, such as the elderly and young children, are known to be particularly vulnerable to serious injury when bitten by a dog. More troubling, it is not possible to predict when and where a serious attack might occur. One study showed that in the case of serious attacks by dogs on a child, 66% of dogs had never previously bitten a child, and 19% had never bitten any human and 66% of owners had taken their dogs to obedience training classes (Risner et al. 2007). According to Dr. Gail C. Golab, director of the American Veterinary Medical Association's Animal Welfare Division, "Any dog can bite... Even the gentlest dog, if it is physically or mentally unhealthy, is in pain, feels threatened, or is protecting its food or a favorite toy, can bite (quoted in USPS 2011)." When an attack does occur, there is a significant chance of a fatality. One study estimated that a risk of 2 fatalities per 1,000 reported dog bites exists nationwide (Wright 1985).

A dog bite is a common type of injury (Holmquist & Elixhauser 2010). One study found that approximately 1 in 50 patients treated in emergency rooms suffered from a dog bite (Beck et al. 1975). It is estimated that half of all children in the U.S. suffer a dog bite injury by the time they are high school seniors (Dr. Alison Tothy, American Academy of Pediatrics, Illinois Chapter, quoted in USPS 2011). Groups of dogs such as brought by commercial dog walkers may increase the safety risk due to aggression characteristic of pack walking and the increased likelihood of social and re-directed aggression. Visitors to the Presidio who have been bitten by a dog or who recognize the danger of off-leash dogs may well have a fear of dogs that would limit their enjoyment or preclude their visiting an area where off-leash dogs are allowed.

Although few studies seem to exist regarding human psychology and attitudes towards negative behaviors of dogs, you need to recognize that potential safety issues are very real in the minds of visitors and have a significant impact on an individual's psychology and ability to enjoy the visiting experience. Niktina-den Besten (2008) found that the presence of dogs was a significant negative factor in the child's mental map of a neighborhood.

Visitors to areas where commercial dog walking is allowed are potentially subjected to unmitigated encounters with large and powerful off-leash dogs. There is little the visitor can do to mitigate exposure to the risk of being charged or attacked by dogs in such cases. Such encounters can be especially frightening in relatively isolated areas with no cover.

By allowing commercial dog walking, you would essentially be giving a small number of wealthy San Franciscans and other wealthy Bay Area residents a disproportionate share of the use of the Presidio that would displace other visitors from certain groups with dog safety issues and those with low tolerance for off leash dogs.

Sincerely,

Charles Pfister

REFERENCES

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From: [Renee Pittin](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking in the Presidio - Support
Date: Monday, February 25, 2013 3:54:20 PM

Dear Mr. Pelka,

I read the proposal concerning dog walking in the Presidio.

Thank you for your intent to incorporate the San Francisco Professional Dogwalker regulations into your management plan. This is important for the families who live in the Presidio, for workers in companies in the Presidio, and for other San Franciscans who appreciate, value and visit the Presidio. I understand that you do not intend unilaterally to change the commercial dogwalker regulations in the future without public comment. However, as the proposal is presently phrased, that is what is implied. I hope that you will change the wording to reflect your intentions.

I hope that you will also work to provide designated off-leash areas and trails in the Presidio. The Presidio Pet Cemetery is an evocative indicator of many decades of pet ownership, responsibility, and compassion in the Presidio community. This is a history which should be honored, and the social relationships and bonds created through real community - neighborhoods of families, including children and pets - should be encouraged and facilitated. This extends also to the companies and corporations which you seek to bring to the Presidio. In almost all of the major companies that are named as "best places to work", the ability to take one's pet to work is one component in the mix. You have the opportunity to enhance working environments and living environments in one fell swoop by providing this designated space.

Dogs have lived in the Bay Area for millennia before the Europeans arrived. Look elsewhere if you are concerned about "damage to the Presidio". Dogs and the uncemented ground they lightly trod are not the problem.

Thank you for your consideration and your time.

Sincerely,

Dr. Renée Pittin


From: [Crima Pogge](#)
To: [Pelka, John](#)
Subject: dog walking in the Presidio
Date: Saturday, January 12, 2013 5:57:04 PM

Dear Mr. Pelka,
as a biologist and frequent visitor to the Presidio I am very concerned about the proposal to invite the commercial dog walking industry into Area B of the Presidio granting professional dog walkers, with up to eight dogs each, use of the Presidio's roadways, parking lots, public trails, and open spaces to conduct their business.

I am afraid that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon, similar to what has happened at Fort Funston. Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking lots, and walkers with eight dogs each will be ever-present on public trails and open spaces. I am also concerned that the costs of administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers will be paid for by the American tax payer.

As far as I know, commercial dog walking has never been legally permitted on any of our National Park lands. I am afraid that commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. My understanding is that commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

I urge you to reconsider this plan.

--

Crima Pogge
Biology Instructor at CCSF

From: [Alice Polesky](#)
To: [Pelka, John](#)
Subject: No Dog Walkers in the Presidio
Date: Saturday, January 12, 2013 11:23:18 AM

Dear Mr. Pelka,

Please do not, not, not allow commercial dog walkers in Area B of the Presidio. In its desire to accommodate the belligerent dog owners and the people who profit from them (people who pay virtually nothing to cover the damages dogs create), more of our precious space is being given away to dogs --- not to wildlife or to people who prefer nature to noise, and often, attacks. People who own dogs have absolutely no right to foist them on the rest of us. Nor are dogs good for wildlife, either:

<http://www.usu.edu/ust/index.cfm?article=48717>

Even four dogs per walker are four too many. The parks belong to us. There may be lots of dog owners in San Francisco, but they are still the minority. Don't let them take over another inch. They have already proved to be completely irresponsible and indifferent to the needs of the rest of the population. Let them find and pay for some barren, remote area so they can walk and toilet their dogs without subjecting nature lovers to the noise, stink, chaos, destruction, and very often fear, which are the only things that they and their animals contribute to the environment.

Thank you,
Alice Polesky



From: [Alice Polesky](#)
To: [Pelka, John](#)
Subject: No Commercial Dogwalking in the Presidio
Date: Tuesday, February 19, 2013 4:54:38 PM

Dear Mr. Pelka,

I urge that you disallow all commercial dog walkers from the Presidio. Dogs are destructive to the wildlife, and often disruptive -- and even vicious -- to other park users. There is no justification for abusing our publicly financed parks so that private businesses can profit. Many dog walkers cannot control the dogs they are walking and some are even abusive to the people whom their dogs attack. Not that park experience we need, let alone pay for! Let these businesses rent or buy a space that is already environmentally degraded, where the rest of the public will not be harassed, and take the dogs there. Public lands are not about profits for individuals, especially destructive ones, like dog walkers, but mandated, paid for, and conserved for all of us.

Respectfully,
Alice Polesky



From: [Ildiko Polony](#)
To: [Pelka, John](#)
Subject: No commercial dog walking
Date: Tuesday, January 15, 2013 12:53:12 PM

Hello John Pelka,

Please don't consider allowing commercial dog walking at the Presidio National Park. I treasure the Park as a truly unique piece of urban wilderness and allowing commercial domesticated dog walking in the Presidio would undermine this wildness. I have been a volunteer at the Presidio for about 2 years working to restore this park. I am afraid that commercial dog walking would undermine this work. I love dogs, and they need to get walked, but that's what the cities many dog parks are for. Do not allow commercial dog walking at the Presidio.

Thank you,

Ildiko Polony

From: [Heather Potts](#)
To: [Pelka, John](#)
Subject: Please Continue To Allow Professional Dog Walking in Presidio
Date: Friday, January 18, 2013 7:51:46 PM

I live in *San Francisco* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Heather Potts

Proud owner/ guardian of Cassie, a golden retriever who has brought much joy to many lives.

From: [Suzanne Price](#)
To: [Pelka, John](#)
Date: Friday, January 18, 2013 2:28:43 PM

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

From: [Beth Pruitt](#)
To: [Pelka, John](#)
Subject: Presidio dog walking
Date: Thursday, February 21, 2013 9:48:44 AM

As concerned SF homeowners, dog owners and voting citizens, I am writing to express my concerns for the preservation of access to the Presidio for dog walking. I agree with the positions of Other concerned citizens as stated below.

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

Thank you for your attention to our concerns.

Beth Pruitt and Matt Hopcroft

From: [judy](#)
To: [Pelka, John](#)
Subject: Limits on Commercial Dog Walking
Date: Wednesday, November 28, 2012 7:36:52 PM

I was so happy to read about this proposal. While living in the Presidio in 2006, I was riding my bike to my son's preschool, near Paul Goode Field. A large black dog came out of the scrub, got up on his hind legs, and lunged at me. I shouted at the dog, and was spared. I looked to my right, and the dog walker was lounging under trees with other dog walkers. She offered no apology, and lazily retrieved the dog. If my son was in his bike seat, the result could have been much different.

The prevalence of dog walkers that poorly supervised their charges kept me from enjoying the Presidio many times. We would walk to the beach from our house on Liggett, and dog walkers crowding the beach would inevitably lead to me to picking up my son for his safety. The beach trips were tense, and became less frequent because of dogs.

On the rare mornings I walk along the beach at Chrissy Field, commercial dog walkers are visiting with their dogs, most generally off-leash, and walking eight or more pets. The beach has become a de facto commercial dog walking area.

My children were asked to stop selling lemonade on Liggett Avenue, which is an activity that would harm no one. Dog walkers with too many dogs, and little to no control over them, are allowed to operate their for profit business on NPS lands.

Please adopt the plan to limit Commercial Dog Walking.

Thank you,

Judith Purpura

From: [REDACTED]
To: [Pelka, John](#)
Subject: Keep the Presidio Dog Friendly!
Date: Thursday, February 21, 2013 9:41:57 AM

Dear Mr. Pelka,
I'm writing to encourage you to keep the Presidio a dog-friendly place.
It is important that dogs and people continue to enjoy a clean and healthy place to enjoy the outdoors.
I would be very disappointed if regulations were put in place to limit the open and democratic management of this public area.
Thanks for your work,
Susan Quinlan

From: [Lon Ramlan](#)
To: [Pelka, John](#)
Subject: Re: Oppose Changes in Presidio Trust
Date: Tuesday, February 19, 2013 2:52:27 PM

Mr. Pelka,

As a lifetime San Francisco native I am opposed to your proposed changes. We have all lived and played in harmony for years. There have not been any problems so why the change? Everyone has been very responsible in getting along. San Francisco Bay Area residents have been enjoying walking dogs in the Presidio for generations and want to continue to enjoy life with our dogs in the Presidio. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.). We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time.

Lon Ramlan


From: [Rami Randhawa](#)
To: [Pelka, John](#)
Subject: Commercial dog walking in the Presidio
Date: Friday, January 18, 2013 3:09:41 PM

Hello Mr. Pelka,
I live in Pacific Heights and hike in the Presidio almost everyday with my dog.

This proposal does not come soon enough. Over the last two years specially, there has been an exponential increase in the number of dog walkers with 10-12 dogs in tow. Only last week, as I was walking with my chocolate lab, coming down from inspiration point around a narrow corner, two young woman, working together had about 16 big dogs between them. I took my dog to the side and politely asked the woman leading the first group to please keep one of the dogs away from us as he came over to explore since I was nervous about such a big group. She became extremely abusive, loudly castigating me about my expectations " on the trail". Too often, bags of dog feces are lining the trails with the good intention, I assume of picking them up on the return trip, but are often missed. The presidio is a gem and I, as a dog lover support ALL efforts to use it, but use it responsibly and respectfully.

Thanks

Rami Randhawa


Sent from my iPad

From: [Lucy Rasmussen](#)
To: [Pelka, John](#)
Subject: Dog walking in Presidio
Date: Thursday, February 21, 2013 8:19:17 AM

I do NOT support any changes to the dog walking policies for the Presidio. Do dogs harm the environment? The answer to this question lies in the example of Carmel, CA. Have you seen Ocean Beach-which is free to off-leash dogs? Is it trashed with evidence of dog fouling? No! It is one of the most beautiful beaches on the Ca coast. The town itself is dog-friendly. I have never seen a cleaner or happier place for dogs. Parks nearby are in excellent condition. If you give responsible owners a chance, they will exceed your good expectations! Thanks for your attention to my letter. Lucy R

Lucy Rasmussen, ScD

From: [Susan Rebert](#)
To: [Pelka, John](#)
Subject: Support of Prof. Dog-Walking
Date: Friday, January 18, 2013 1:23:33 PM

I live in *Hillsborough*, and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Susan V Rebert

Sent using 100% recycled electrons

From: [REDACTED]
To: [Pelka, John](#)
Subject: Professional Dog Walking in the Presidio
Date: Friday, January 18, 2013 3:24:02 PM

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,
T.S. Reichardt

From: [Laura Rende](#)
To: [Pelka, John](#)
Subject: Letter Regarding Federal Dog Management Proposal
Date: Saturday, January 19, 2013 2:53:45 PM

To Whom It May Concern:

Our family lives in San Francisco very close to the Presidio and support professional dog walking continuing in the Presidio. We have lived in our current location for more than a decade and have supported the transition of the Presidio to the City. As a family and with multi-generations, we cherish our time walking our dogs and have only encountered responsible, professional dog walkers that truly provide needed exercise and socialization for responsible, safe, and humane dog care. We strongly feel that well cared for and loved dogs improve the health, safety, and well-being of the people that live in San Francisco.

In addition, we specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. We also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Laura and John Rende

From: [Tony Reveaux](#)
To: [Pelka, John](#)
Subject: commercial dog walking
Date: Saturday, January 12, 2013 11:24:49 AM

Please;

No
Commercial
Dog
Walking
!!!!!!!

in our treasured national parks.

Thank you,
Tony Reveaux



From: [Judy Reynolds](#)
To: [Pelka, John](#)
Subject: dog walking in the Presidio
Date: Tuesday, January 15, 2013 9:54:13 AM

Fear Mr. Pelka,

Please do not permit commercial dog walking. Even dog owners with dogs on leash endanger the wild life and the impact of the dog walker industry would be far and above the private use. I enjoy walking there now but would not enjoy running into walkers with packs of dogs and there are people who are allergic to dogs and/or afraid of them. There is also the likelihood of vast quantities of waste. I know from walking my own dogs that it can be hard to keep track of when one needs to clean up after them. We have dog parks in the City that are fenced and not in a fragile wildlife habitat. If more space is needed, let the dog walkers pay for additional fenced parks in urban areas.

Judy Reynolds



From: [debra riat](#)
To: [Pelka, John](#)
Subject: dogs in presidio
Date: Thursday, February 21, 2013 9:33:22 AM

Dear Mr. Pelka

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

I absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.

I disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. The Trust cannot make statements like that without providing evidence to support them, and anecdotal evidence does not count.

thanks!

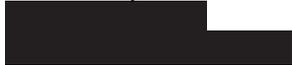
debra riat


From: [H ALLAN RIDLEY](#)
To: [Pelka, John](#)
Subject: Commercial dog walkers - NO!
Date: Tuesday, February 19, 2013 7:00:58 PM

The existing presence of virtual "dog teams" on the Crissy field walk and cavorting on the lawn areas is not compatible with the walkers, joggers, bicyclers & dog-owner walkers who presently occupy the area.

Really such a move to allow them is unthinkable.

With best wishes,
Allan Ridley



From: [Mira Ringler](#)
To: [Pelka, John](#)
Subject: Comments re proposed new dog walking regulations in The Presidio
Date: Monday, February 25, 2013 9:10:29 AM

Dear Mr. Pelka,

It has come to my attention that there are proposals to change the dog walking regulations in The Presidio.

- 1) As a dog owner, I want to continue to enjoy walking my dog in The Presidio.
2. Additionally, as a dog owner who employs a dog walker, I hope that commercial dog walking can continue in The Presidio. I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. As a member of the Crissy Field Dog Group, we absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

Thank you for taking these comments into consideration.

Sincerely,

Mira Ringler

A black rectangular redaction box covering the signature area.

From: [Roberts, Warren](#)
To: [Pelka, John](#)
Subject: Dog walking at the Presidio
Date: Saturday, January 12, 2013 11:29:05 AM

Dear J. Pelka,
As a native San Franciscan who is concerned with protecting our precious open spaces, I strongly request that dog-walking be prohibited in the Presidio

Warren G. Roberts

From: [Lesly Robinson](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking Permits
Date: Thursday, February 21, 2013 2:06:09 PM

Mr. Pelka, read the following (many of which you have received, I'm sure) and reconsider. I'm a native San Franciscan, now living in Stinson Beach, and I'm saddened by what is happening in the Bay Area, especially San Francisco, when it comes to dog walking. It's ridiculous that time and energy is wasted on matters such as this, and truly after hearing from the public over and over again about their love of dogs and the freedom of walking them in the Presidio, it amazes me that you and your agency don't seem to listen to public opinion. Do the right thing and abolish this attitude of bureaucratic policy, which at best, is just a waste of the tax payers money. Trust me, you'll sleep better at night knowing you did a random act of kindness. The following is the present concern:

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. What we DON'T SUPPORT is the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, or change, without public comment, any part of the commercial dog walker regulations in the current proposal. The Presido Trust is MANDATED by NEPA (the National Environmental Policy Act) to involve the public through a participatory process before changing regulations such as these.

Respectfully,

Lesly Robinson

From: [Ashley Rogers](#)
To: [Pelka, John](#)
Subject: Support for commercial dog walking in the Presidio
Date: Thursday, January 24, 2013 10:35:45 PM

As a dog owner and Bay Area resident, I support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care, particularly in San Francisco where the majority of residents live in multi-family housing where yard space is limited. Well cared for, exercised, and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Thank you,
Ashley

From: [James Rogers](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking in the Presidio
Date: Friday, January 18, 2013 2:50:44 PM

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

James Rogers

San Francisco Voter and Dog Owner

From: [Celia Ronis](#)
To: [Pelka, John](#)
Subject: Please do not open the Presidio to commercial dog walking
Date: Saturday, January 12, 2013 11:22:07 PM

I am opposed to commercial dog walkers in the Presidio.

I have walked and bird watched in an East Bay Regional Park where professional dog walkers are permitted. The peaceful, pleasant atmosphere is destroyed for the visitor coming to enjoy the natural open space provided by the parks. Morning and afternoon the paths are clogged with these dogs. The parking lots near the trails favored by the dog walkers are filled with their cars. The dog walkers are commercial operations that do not offer any benefit to the parks.

It is estimated that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon. Walkers with eight dogs each will be ever-present on public trails and open spaces. The costs of administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers will be paid for by the American tax payer.

Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Celia Ronis

From: [Judy Roos](#)
To: [Pelka, John](#)
Subject: dog walkers
Date: Tuesday, January 15, 2013 2:32:48 PM

Over the last seven plus years I've lived in Baker Beach and South Baker Beach I've noticed more and more dog walkers in our woods and on the boardwalk at Lobos Creek. More often than not all dogs are on leash. Some walkers make no effort to clean up after their charges, leaving the trails very unpleasant. Who will see to it that the rules will be enforced? We can't even get parking rules enforced so I doubt the Park Police will be tasked with this.

I would urge the Trust to limit commercial dog walkers to the current areas of Crissyl

Judy Roos - 

From: [Emily Roth](#)
To: [Pelka, John](#)
Subject: no commercial dog walking in the presidio ...
Date: Tuesday, February 19, 2013 2:48:54 PM

Dear John Pelka,

I would like to register my disagreement with any proposals allowing access to Presidio property for commercial dog walkers and their dogs. I believe that commercial dog walkers and dogs should also be prohibited from using the trails and beaches at Crissy Field and all GGNRA properties. It has become difficult for bird watchers like myself, and runners and others to enjoy these areas when there are just too many dogs in every location around the Presidio property. And many of them are off lease and disrupting bird activities.

Thank you for your consideration of this matter.

Emily Roth

[REDACTED]
[REDACTED]

From: [leewaysf](#)
To: [Pelka, John](#)
Subject: Keep commercial dog walking out of our National Parks.
Date: Saturday, January 12, 2013 6:23:43 PM

Shocked to hear this is even being considered!

Unruly dogs, not leashed, provoke leashed dogs, and harass birds
 Surly walkers, screaming at dogs to come back to them, cars/trucks full of barking dogs. They do not always pick up poop, or have too many dogs and aren't watching them all carefully

Why would more dogs be allowed in a NP? It's bad enough to have your walk, bird watching, quiet time disturbed for dogs!

I am a dog owner, and follow the rules. The majority of owners, don't; and won't. How would you ever measure compliance? There is never any enforcement of keeping the dogs out of sensitive habitat or picking up dog waste. Just look at how Ft. Funston is only enjoyable for people with dogs.

Thank you for reading this email. I bird in the NP and object to this terrible idea.

Lee Rudin



Unless someone like you cares a whole awful lot, Nothing is going to get better. It's not. Dr. Seuss
 "The Lorax"



Please consider the environment before printing this email. Thank you.

From: [sandra](#)
To: [Pelka, John](#)
Subject: re presidio trust
Date: Tuesday, February 19, 2013 8:15:57 AM

mr. pelka

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio. I personally have been walking my dogs for over 30 years and have only seen one incident the whole time, but I do agree that there should be a limit to the number of dogs allowed each dog walker. I also know that they are very responsible and always keep the area clean of feces.

We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

 [sandra russel](#) 

From: [Susan Russell](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking Permits
Date: Friday, February 08, 2013 3:12:51 PM

I am completely opposed to requiring commercial dog walkers to obtain permits.

I live in Marin Co. and walk my one dog often at Crissy Field. I have never seen any commercial dog walker do anything objectionable. I believe you are targeting commercial dog walkers unfairly.

I see far more problems with individual dog owners who do not know how to handle their one, or two, badly behaved dogs. What are you going to do about them? And no, the answer is not banning dogs, the answer is better oversight.

I've seen more badly behaved children and people at the Presidio than I have seen badly behaved dogs. But you can't ban them, unfortunately.

Commercial dog walkers are far more likely to be well behaved, considerate, have control of their dogs and have well behaved dogs than individual owners.

The dogs that are walked by commercial dog walkers live in San Francisco. Each dog's owner pays taxes that goes to support the Presidio.

Targeting commercial dog walkers is unfair and I am completely opposed to it.

Thank you,

Susan Russell

From: [Geoff Ruth](#)
To: [Pelka, John](#)
Subject: Dog walking permits
Date: Friday, January 04, 2013 8:27:47 PM

Dear Mr. Pelka,

I would like to express my strong support for the proposal to require commercial dog walkers to acquire and have a permit before walking their dogs in Area B of the Presidio trust. I further strongly support that all dog walkers be required to remove dog feces, even if there is not explicit signage -- it is absurd that this is not already a requirement for walking a dog in any area.

I appreciate your work in pushing this forward, in the face of probable opposition from the (sometimes rabid) dog lobby of San Francisco.

Sincerely,
Geoff Ruth

[Redacted signature block]

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

January 16, 2013

Reg: Commercial Dog Walking

Dear John Pelka:

I am writing to express my support of the proposal to require permits for commercial dog walkers, but also to argue that even with a permit, the number of dogs being walked by an individual will remain too high. The permit helps insure that commercial dog walkers understand applicable laws, but too many dogs prevents walkers from even knowing when they have broken the law.

As someone that both lives and works in the Presidio, I understand that it is and will always be a popular place to walk dogs. However, I have seen commercial walkers with 15 or even 20 dogs, and the more dogs you have the harder it is to follow expectations such as the requirement to pick up excrement left by dogs. Simply put, it gets lost in the confusion, until someone else steps on it! Furthermore, since the walkers are not the owners, they have trouble communicating voice control over individual dogs. I propose that all commercial dog walkers be required to get a permit, and that the limit be six dogs.

Sincerely,



Ivan Samuels



From: [Kris Schaeffer](#)
To: [Pelka, John](#)
Subject: No commercial dog walking in the Presidio
Date: Tuesday, February 19, 2013 5:42:51 PM

No commercial dog walking in the Presidio, please. No one benefits.

Kris Schaeffer
San Francisco resident 40 years

From: [david schmidt](#)
To: [Pelka, John](#)
Subject: Please, no professional dog walkers in the Presidio
Date: Monday, January 14, 2013 11:34:44 PM

Dear Mr. Pelka,

I understand there is a proposal to allow professional dog walkers to walk up to eight dogs each in the Presidio. I strongly oppose this.

Can you imagine the Crissy Field trail with eight dogs coming at you? Now imagine that you're a toddler with eight huge, 6-foot tall (in their eyes) dogs coming at you. This is a terrifying prospect for parents and children. It's even worse than having two horses coming at you. It's downright dangerous to children. What if one of the dogs gets loose and bites a child? That could be almost a daily occurrence. Please protect the children, and not the professional dog walkers!

This proposal is even bad for dog owners trying to walk their one or two dogs. When a gang of eight dogs passes one or two unfamiliar dogs, there's almost sure to be a dogfight. So this is bad for dogs and dog-owners too. What about runners? They'll be forced to jump out of the way of the eight dogs. Let's not let the Presidio go "to the dogs."
Keep professional dog walkers OUT of the Presidio.

--

David Schmidt



From: [Vicky Schulman](#)
To: [Pelka, John](#)
Subject: Dog walkers in the Presidio
Date: Thursday, February 21, 2013 9:42:58 PM

Hello Mr Pelka,

I wanted to let you and the trust know that I see no reason to ban professional dog walkers from the Presidio. The Presidio is a national recreation area, but it is also part of our city. It should be available for SF residents to enjoy. Joggers, bicyclists and skateboarders annoy me, but that does not make it ok for me to request they be banned. If we choose to live in a city, we have to tolerate those whose interests are different than our own. Unless people are engaging in an activity is actually dangerous or destructive, there is no reason to single them out. There are more dogs than children in SF and dog walkers should be able to enjoy this wonderful resource along with all other SF residents. If dog walkers are following leash law and aren't walking more dogs than permitted , there is no reason to ban them from the park.

Sincerely,
Vicky Lewolt Schulman

From: [REDACTED] [Cameron Scott](#)
To: [Pelka, John](#)
Subject: please preserve off-leash dog walking
Date: Thursday, February 21, 2013 9:19:52 AM

Dogs need off-leash socializing -- they are natural animals, too -- and having the chance for quality exercise makes them better citizens in the streets of the crowded city.

As a human who loves nature, some of my most positive community and natural experiences have occurred in with my dog off-leash dog areas in and around San Francisco. The other dog owners are responsible and respectful of the natural spaces.

Please, don't turn a solution into a problem by restricting off-leash dog activity in the Trust's lands.

Thank you,
Cameron Scott

--

Cameron Scott, Reporter
SocialTimes.com, part of Inside Network

[REDACTED]

From: [Jan Scott](#)
To: [Pelka, John](#)
Subject: Dog walking in the Presidio
Date: Thursday, February 21, 2013 3:58:28 PM

Mr. Pelka,
As a San Francisco resident for 45 years, I strongly support continuing to allow dog walking in the Presidio. We have been walking our dogs there for many years successfully, and it allows us and our dogs to stay healthy. I also agree that commercial dog walking should be allowed as your plan states. However, I do not agree that commercial dog walking regulations could be changed in the future without public comment. I think anything as important as this should be subject to public discussion. I also disagree with assertions in the proposal that dogs cause more damage to the environment than people. The Trust should not make such a statement without scientific evidence to support it.

Thank you,
Joanne Scott

From: [REDACTED]
To: [Pelka, John](#)
Subject: Dog walking
Date: Thursday, February 21, 2013 9:34:45 AM

Please continue to allow dogs to walk in the Presidio. My dog loves to sniff everything and every one that walks there and it would break my heart to have to say no to her.

Thank you,
Mac Senour

From: [Avrum Shepard](#)
To: [Pelka, John](#)
Subject: Professional (or Commercial) Dog Walking Permits in the Presidio
Date: Sunday, February 24, 2013 2:44:01 PM

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio. I urge the Trust to designate areas for off-leash dog walking within its land.

I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.). It's nice to see the professional dog walkers able to financially support themselves, recreate, and provide a needed service. Small business needs to be supported in our city.

I oppose the idea that the Presidio Trust can change the Commercial Dog Walker permit regulations contained in the proposal at any time in the future without having to take additional public comment. This added public process should be explicitly included in the wording of the proposal where it says the Trust can revise the regulations should they decide changes are appropriate. Because it was not explicitly stated, an argument could be made that the proposal gives the Presidio Trust the ability to change the regulations without further public comment. This point -- that the Trust must take additional public comment should they decide to make any changes to the regulations at any point in the future -- made in a verbal phone call from John Pelka should be clarified in writing before the proposal is adopted.

I disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment. The Trust cannot make statements like that without providing evidence. Anecdotal evidence does not count.

Avrum Shepard

From: [Jake Sigg](#)
To: [Pelka, John](#)
Subject: Commercial dog walking in Presidio
Date: Friday, January 18, 2013 9:29:20 AM

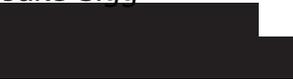
To: Presidio Trust

San Francisco is the third densest city in the United States, after New York City and Jersey City. Yet (I think) it has the largest per capita dog population.

I sympathize with those who want to exercise their dogs, as they do need it. But that is not the Presidio Trust's responsibility. Its responsibility is to preserve the natural resources, provide passive recreation, and other compatible uses. Commercial dogwalking is inconsistent with these ends, detracts from others' park experiences, and brings a host of unintended consequences.

Surprisingly--in spite of our being the third densest city--some people bring their dogs *daily* from Palo Alto and the East Bay to run them in Fort Funston and Bernal Hill. Why? San Francisco, including the Presidio and the GGNRA, are hospitable to dog running. But it's at cost to other legitimate uses which are consistent with your mandate.

Jake Sigg



From: [Bill Simpich](#)
To: [Pelka, John](#)
Subject: Commercial dog walks? No way.
Date: Tuesday, January 15, 2013 1:35:06 AM

The protection of the commons is a precious thing. Do not let the forces of the dollar move in and use up our precious space. I own two dogs and I use a dog walker on occasion. No way would I ever ask a commercial dog walker to do anything like what is suggested here. It is, literally, stealing from the people.

What makes a bad idea even worse is the notion of walking eight dogs at a time in a protected area. That is an incredibly difficult job to do. I know, I often walk three dogs at a time and that is no easy task. Cleaning up after them, chasing after them, keeping the peace, etc.. Eight dogs at a time is a terrible idea in the best of situations.

Commercial dog walkers have the entire city to use to make their living. Don't let them make their money in an abusive way on public lands.

Bill Simpich


From: [PATRICK SKAIN](#)
To: [Pelka, John](#)
Subject: No Commercial Walking in the Presidio Please: Skain
Date: Saturday, January 12, 2013 12:49:46 PM

Dear Mr. Pelka: It would be the greatest folly and outright abrogation of stewardship responsibilities to allow the commercial dog walking industry into Area B of the Presidio. In my years of experience, the professional dog walkers interpret all rules liberally or outright ignore them. I routinely see professional dog walkers with one or two dogs on leash while the rest run free. They believe mistakenly that they have "voice control" of their animals so it's OK; but it is not legal nor appropriate. Also, nothing deters them once they believe they have achieved dominance over an area or trail. They refuse to cooperate or police one another. Any attempt at enforcement is met with contempt; and the expense to provide park personnel to oversee these areas regularly would be prohibitive. Caving in to the dog advocates for a trial period would likewise border on lunacy. Just say no and you will be serving the best interest of the National Parks. If you would like a prime example just visit Pine Lake Park situated adjacent to Stern Grove in San Francisco. The West end of Pine Lake Park is designated a Significant Natural Resource Area and by code dogs are required to be on leash at all times. However this area is regularly occupied by commercial dog walkers with their animals off leash which leads to extensive damage to park resources. It would be a neglect of duty for the Presidio Trust to advocate for dogs or promote access to this national treasure to the commercial dog walker industry. Sincerely, Patrick Skain. [REDACTED]

From: [Scott Snow](#)
To: [Pelka, John](#)
Subject: I support Presidio Trust Professional Dog Walking
Date: Thursday, February 21, 2013 6:38:35 AM

Hi John,

> 1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

>

> 2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

>

> 3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment

From: [Jane Solano](#)
To: [Pelka, John](#)
Subject: commercial dog walking in NP's
Date: Sunday, January 13, 2013 9:58:42 AM

Dear Mr. Pelka,

I am strongly opposed to allowing commercial dog walking in our national parks. Considering the effects of dogs in natural areas and that professional dog walkers would be taking up to 8 dogs at a time into these areas, it just doesn't make sense. I feel stewards of national parks should be dedicated to preserving, not ruining, the natural beauty and the serene experience that they offer those of us walking through it. Dogs just ruin that.

Please work to support my position against dogs in national parks. I appreciate it.

Sincerely,
Mrs. Jane Solano



From: [Yvonne Soria](#)
To: [Pelka, John](#)
Subject: Presidio Call to action dog walking rule
Date: Thursday, February 21, 2013 11:03:55 AM

Dear John Pelka,

I am writing this email in support of San Francisco dogs walkers in the Presidio.

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.

Thank you,
Yvonne Soria
Yvonne

From: [kathryn.spence](#)
To: [Pelka, John](#)
Subject: NO to dog walking in National Park lands
Date: Saturday, January 12, 2013 9:24:11 PM

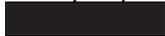
Dear Presidio Trust,

Please do not allow commercial dog walking in our national parks.

The environment and visitors will be adversely affected.

Thank you,

Kathryn Spence



From: [Leann Speta](#)
To: [Pelka, John](#)
Subject: Re: Dog walking permits
Date: Friday, January 04, 2013 8:35:59 PM

Dear Mr. Pelka-

I understand that you are considering a proposal that would require commercial dog walkers to acquire and have a permit before using Area B of the Presidio Trust and wanted to express my support of this proposal. I was surprised to learn that it isn't already required that dog walkers remove dog feces and strongly encourage this to be obligatory.

I appreciate your efforts to protect our natural spaces..

-leann speta


From: [SharonSS](#)
To: [Pelka, John](#)
Subject: Dog Walkers/National Parks
Date: Monday, January 14, 2013 6:47:30 PM

Dear Mr. Pelka,

I agree with the following statement. Please do not allow commercial dog walkers to take over our National Park. As the victim of an attack by three vicious dogs I look to the Presidio as a safe area to walk and enjoy.

Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Thank you.

Sharon Starr



From: [Katrina Steffek](#)
To: [Pelka, John](#)
Subject: Dog walking continuing in the Presidio
Date: Friday, January 18, 2013 2:40:25 PM

Hello,

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,
Katrina Steffek

From: [Sandy Steinman](#)
To: [Pelka, John](#)
Subject: Please do not allow commercial dog walkers in the Presidio
Date: Saturday, January 12, 2013 5:08:08 PM

I am opposed to commercial dog walkers in the Presidio. it is estimated that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon. Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking lots, and walkers with eight dogs each will be ever-present on public trails and open spaces. The costs of administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers will be paid for by the American tax payer.

Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Sandy Steinman

From: [Sandy Steinman](#)
To: [Pelka, John](#)
Subject: no to commercial dog walking at the presidio
Date: Tuesday, February 19, 2013 4:59:59 PM

Commercial dog walking is not an appropriate use of our National Park lands.

From: [Barbara Stuart](#)
To: [Pelka, John](#)
Subject: Dog Walking in Presidio
Date: Thursday, February 21, 2013 2:06:34 PM

Dear Mr. Pelkaat:

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

Respectfully,

Barbara Stuart


From: [Mary Jo Sutton](#)
To: [Pelka, John](#)
Subject: No to commercial dog walking in our National Parks
Date: Wednesday, February 20, 2013 1:00:56 PM

Dear Mr. Pelka,

I am writing to express my concern about allowing commercial dog walkers in the national parks. I used to work at Fort Baker and experienced many professional dog walkers on the grounds there. They come with a car full of dogs and are unable to adequately control them or pick up after them. The park is a preserve which is not suitable for such a disruptive animal group.

I urge to not allow commercial dog walkers on park lands.

thank you so much for listening,

Mary Jo Sutton



From: [Shelley Sweet](#)
To: [Pelka, John](#)
Subject: Proposed rules for dog walking
Date: Thursday, February 21, 2013 2:07:37 PM

Dear Mr. Pelka,

I am a San Francisco Bay Area resident that has enjoyed walking my dogs for personal recreation in the Presidio for over 40 years. I want to continue to enjoy walking with my dogs in the Presidio.

I also support the continued use of commercial dog walking in the Presidio, which has been going on for decades. It allows dogs to stay healthy and well-behaved during the week when their owners are at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

I absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, as well as any part of the commercial dog walker regulations in the current proposal.

Please take into consideration the critical needs of dog-walkers as you work on proposed rules for dog walking in Area B.

Thank you.
-Shelley

Shelley Sweet


From: [kirra.swenerton](#)
To: [Pelka, John](#)
Subject: Comments on commercial dog walking permits
Date: Friday, February 01, 2013 10:29:30 AM

I strongly oppose the proposal to permit commercial dog walking in the Presidio. I am an open space manager in the bay area and have many years of direct experience with commercial dog walking operations and their highly destructive impact on the land. Use of the Presidio by the commercial dog walking industry constitutes an exploitation of park lands for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience. Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking areas, and walkers with eight dogs each will ply the public trails and open spaces. I have observed that when commercial operators move into an area, private individuals who are walking their own dogs are displaced and pushed into peripheral and off-limits areas.

Furthermore, commercial walkers with large packs of animals frequently cannot control all the dogs in their group, cannot maintain voice control, allow many of their wards off leash, allow dogs to dig and chase protected wildlife and are not able to keep track of picking up all the dog feces. Large groups of dogs spread out over trails and are intimidating to children and the elderly. Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will impair park resources, and will serve only private enterprise at the expense of the American public.

Sincerely,

Kirra Swenerton

[REDACTED]

[REDACTED]

From: [Jane Sylvester](#)
To: [Pelka, John](#)
Subject: commercial dog walking in the Presidio
Date: Tuesday, January 29, 2013 5:16:42 PM

I do not think the Presidio or any public or regional park is an appropriate area for commercial dog walking. I say this as a person who has been attacked and very badly bitten by dogs in a regional park who were behaving as a pack. It is not natural or comfortable for dogs to be walked in large groups like that. Their behavior is unpredictable as a result. Please do not allow this. In addition I believe that dogs off leash should not be allowed except in areas specified for dogs and dog owners. I love dogs, but strongly feel they have their place. Small children, adults and seniors health and safety would be jeopardized by allowing commercial dog walking or off leash areas.

js

From: [Suzanne Taunt](#)
To: [Pelka, John](#)
Subject: Dog walking in the Presidio
Date: Tuesday, January 15, 2013 8:07:38 AM

NO to professional dog walking in the Presidio. What are you and others thinking....?

The cost to the tax payer is inestimable.

No, no ,no to professional dog walking in the Presidio.

Suzanne Taunt



Sent from my iPad

From: [Sidney Tarlow](#)
To: [Pelka, John](#)
Subject: re: commercial dog walking permit..
Date: Thursday, February 21, 2013 10:51:58 AM

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.

From: [Delia Taylor](#)
To: [Pelka, John](#)
Subject: Professional dog walkers
Date: Saturday, January 12, 2013 7:36:07 PM

Dear Mr Pelka,
Professional dog walkers should not be allowed everywhere in our public parks .

Sincerely,

Delia Taylor


From: [irene tenney](#)
To: [Pelka, John](#)
Subject: Dog walker regulations needed
Date: Thursday, January 24, 2013 4:21:41 PM

Hello:

I believe that a dog walker should be CERTIFIED by the city he/she works in or some other state organization that will require a card, badge or some such identification. Continuing education every two years and payment of reasonable business fees to the city.

For the government: a record of incidents where the dog walker was involved and the results of an investigation or finding if any.

No more than FOUR DOGS in his/her walking care.

Demonstration of total voice and hand signal control of dogs in his/her charge and mastery of equipment.

Pick up dog refuse.

Irene Tenney
German Shepherd Rescue member
Canine Behavior Academy graduate

German Shepherd Dogs are not pets: they're soul mates.

From: [Kristy Thornton](#)
To: [Pelka, John](#)
Subject: Support for Professional Dog Walking in the Presidio
Date: Monday, January 21, 2013 9:47:59 PM

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City. My wonderful professional dog walker is the primary reason that my dog (and therefore my household!) is calm and happy during the work week.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Kristy Alvarez Thornton


From: [Richard](#)
To: [Pelka, John](#)
Subject: Dog Walking
Date: Friday, February 08, 2013 4:40:44 PM

Hi John,

The proposed ordinance is pure common sense. Commercial dog walkers need to be licensed and responsible for their actions everywhere in the City including (and especially) the Presidio.

Richard Tilles

From: [Trace Urdan](#)
To: [Pelka, John](#)
Subject: Public Use Limit on Commercial Dog Walking
Date: Wednesday, November 28, 2012 9:13:50 PM

The proposal represents a useless and unnecessary burden on lawful commercial and entrepreneurial commerce. At a time when so many are seeking Gainful Employment this proposal is ill conceived. The licensing fee represents a tax, enforcement an unnecessary expense that detracts from more useful activities for Park Police. Any nuisance created by unskilled dog walking is surely covered by other existing statutes. Please reject this foolish proposal.

Trace Urdan


Sent from my iPad

From: [REDACTED]
To: [Pelka, John](#)
Subject: I Support professional dog walking continuing in the Presidio
Date: Monday, January 21, 2013 1:46:21 PM

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Glenn Visgitus

[REDACTED]

[REDACTED]

From: [Rudyard Wallen](#)
To: [Pelka, John](#)
Subject: Dogs in the Presidio
Date: Tuesday, February 19, 2013 5:28:42 PM

Hi John,

I'm writing to add my voice to this issue. As a former (and I hope, future) dog owner, I see how most people cannot manage their single or pair of dogs. Also, we have a tendency to think that rules, laws, and guidelines apply to others, just "not to me".

I thin kit would be a disaster to allow dogs in the Presidio, and it would set a bad precedent for other similar protected areas.

thanks

Rudyard Wallen


December 20, 2012

Via U.S. Mail and email

Mr. John Pelka
The Presidio Trust
103 Montgomery Street
P.O. Box 29052
San Francisco, CA 94129
Email jpelka@presidiotrust.gov

Re: Commercial Dog Walking proposal in Area B of the Presidio

Dear Mr. Pelka,

Thank you for this opportunity to comment on the proposal for commercial dog walking in the Presidio. The Presidio is known for its diversity of wildlife including the 300 species of birds, 30 butterflies, 60 bees and 330 native plant species. People come to enjoy the Presidio. People enjoy the Presidio as described on the website as “an oasis of nature where wild open spaces and places shaped by people welcome the community to explore, play, learn, volunteer, and find refuge. In an afternoon hike one can experience the native plant communities of pre-urban San Francisco as well as the grandeur of cypress groves planted by the Army to break the powerful ocean winds. This exceptional diversity is what attracts visitors - from hikers to migratory birds - to the park.”

This proposal does not benefit the residents, visitors or wildlife in the park; instead this proposal detracts from the park experience. Commercial dog walkers are making money and taking a toll on the park which is diminishing the experience for park visitors. The commercial dog walkers are not taking public transit or bikes to the Presidio but instead are arriving in large vehicles. Commercial dog walking will have a negative impact on the wildlife that lives in or migrates through the Presidio. Taking four or more dogs twice a day will lead to more problems of erosion, loss of plants from urine, possible domestic pet wildlife or human impacts. Ground nesting birds and birds stopping on their migratory routes to or through the Presidio will be negatively impacted. People enjoy walking in the park but do not enjoy seeing the bagged or un-bagged feces left along the trails. This will lead to either a degraded Presidio or increased Park resources required to pick up feces left in the park and requirement for restoring the land, water and native wildlife. Area B is the interior part of the Presidio but the watershed leads to the lagoon and San Francisco Bay or Pacific Ocean. The feces can harm humans and wildlife and lead to algal blooms.

If commercial dog walking is allowed it should be limited to paved parking areas only. This will minimize the impact to wildlife and make any feces easier to scoop and flush¹ and less of a Park resource issue to retrieve and dispose of on a daily basis.

Thank you for considering these comments.

Sincerely,



Noreen Weeden



¹ EPA After the Storm - Stormwater Pollution Solutions 2007_04_30

From: [Wehrheim, Joseph](#)
To: [Pelka, John](#)
Subject: dog walk proposal
Date: Monday, February 11, 2013 7:30:00 AM

Mr. Pelka,

Getting dogs on leash is the key.

Even so, there are still irresponsible, rogue dog-walkers with dogs chasing joggers and children. How can any rule be enforced?

In addition, some of the worst incidents occur with non-dog-walkers having their “friendly” dogs off-leash. A leash rule should be extended to all dogs.

Sincerely,
Joe Wehrheim

From: [REDACTED]
To: [Pelka, John](#)
Subject: No on Commercial Dog Walking
Date: Wednesday, January 30, 2013 8:27:14 AM

Use of the Presidio by the commercial dog walking industry constitutes an exploitation of park lands for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience.

Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will impair park resources, and will serve only private enterprise at the expense of the American public.

I agree with these statements.

If some licensing is done, I'd propose limits of three dogs per walker, and a max of 10 walker trips per day.

Teresa Welborn

[REDACTED]

From: [Jacalyn White](#)
To: [Pelka, John](#)
Subject: Professional Dog Walkers in Presidio
Date: Friday, January 18, 2013 2:46:47 PM

I work in San Francisco full-time and have employed a professional dog walker for 10 years now. My dog is happier, healthier and much better socialized around other dogs because of the services a professional dog walker provides. It is so important for the professionals to have large spaces to walk dogs in SF. The laws that limit each walker to 8 dogs are fair, reasonable and make sense to be implemented in the Presidio. Thanks for your attention.

Jacalyn White

From: [Jenna Whitman](#)
To: [Pelka, John](#)
Subject: Presidio Trust - dog rules
Date: Friday, January 25, 2013 6:34:50 AM

I live in *Oakland, CA* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

-Jenna Whitman


From: [samuel wilson](#)
To: [Pelka, John](#)
Subject: commercial dog walking out of our National Parks
Date: Tuesday, January 15, 2013 11:23:47 AM

Hello,

Please keep commercial dog walking out of our national parks. Dogs already have more than enough parks to go to and very little regulations to follow, which are rarely followed. There will be more run in with coyotes and thus less habitat for them.

Thank you for your time,

S.K. Wilson

"We do not inherit the Earth from our parents, we borrow it from our Children."

-Native American Proverb

From: [Stewart Winchester](#)
To: [Pelka, John](#)
Subject: Stop The Commercial Use of Public Lands!!
Date: Tuesday, January 29, 2013 10:27:38 PM

Dear Sirs/Madams: As a dog lover, i find the dog-walking business of doing their business on Public Properties set aside for Historic Preservation, quite intolerable. As a Conscious Capitalist, i find the 'free-pass' of private concerns degrading the grounds without compensation, an inappropriate subsidy. A fee structure should be set up to collect for damages to every tree and grassy area that will not show the damage immediately upon infraction. Assessments of these Commercial Enterprises to protect the 'Commons' seems the only the only way to pay for the enforcement of 'Common Sense'! As a Horticulturalist, i must speak for the living green entities that can neither run from dogs nor bark their displeasure in those moments of what must be sheer terror.....'land-mines' in reverse!

Yours respectfully
Stewart Winchester

From: [Ann York](#)
To: [Pelka, John](#)
Subject: RE: 2-Minute Action: Support Professional Dog Walking in the Presidio - due 1/25/13
Date: Saturday, January 19, 2013 9:12:27 AM

I live in Pacifica and support professional dog walking continuing in the Presidio.
Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Ann York Albert

Date: Fri, 18 Jan 2013 15:17:51 -0600
 Subject: 2-Minute Action: Support Professional Dog Walking in the Presidio - due 1/25/13
 From: saveoffleashdogs@gmail.com
 To:

Hi All,

Please take a few minutes to email to support professional dog walking in the Presidio.

The native plant advocates are encouraging their followers to write comments opposing commercial dog walking in the Presidio. Note this particular ruling only applies to the Presidio Trust Area B, which doesn't include areas managed by the NPS/GGNRA (e.g. Crissy Field).

Basically, the Presidio Trust proposes adopting the same regulations as apply to San Francisco city parks and honoring the City's commercial dog walking permits. The major new restriction for professional dog walkers is the maximum of eight dogs. The official summary of the proposed ruling is [HERE](#).

No matter where you live, it is most important to send a comment on this Federal dog management proposal and a 2-minute suggestion is below. Even better is to personalize your comment with your own insight and background (e.g., children, senior, minority, disability, etc.); make sure to say you support commercial dog walking continuing in the Presidio.

DEADLINE: Friday, January 25, 2013

EMAIL TO: jpelka@presidiotrust.gov

2-MINUTE COMMENT SUGGESTION:

I live in <Your City> and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and

humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

About the Author: This e-mail is authored by Arnita Bowman, who enjoys the GGNRA and Bay Area parks with her family, including the family dog, and is a member of several Bay Area organizations that are working to preserve open-spaces for all people, including those that enjoy both on-leash and off-leash dog recreation.

Cancellation: To be removed from this email distribution, please respond to saveoffleashdogs@gmail.com with "Cancel" in the subject line. Thank you for your support in keeping the Bay Area people and dog-friendly.

From: [Karl Young](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking
Date: Thursday, February 07, 2013 9:55:10 AM

Dear Mr. Pelka,

I was sorry to hear about the recent proposal to allow commercial dog walking in the Presidio.

I already limit my time in the Presidio due to the plethora of off leash dogs and jokingly refer to the Presidio as the largest off leash dog park in the US. It's sad that one of the most beautiful urban parks in the world is already off limits to many who find it difficult to deal with all too frequent aggressive off leash dogs. Though most dog owners are responsible, in a city the size of San Francisco it only takes a tiny percentage of irresponsible ones to deter many from the Presidio.

I realize how difficult it is for the Trust to balance the interests of so diverse a set of stake holders while trying to remain economically viable (which seems an unfortunate precedent for National Parks in my view). But allowing commercial dog walking will be the last straw in terms of keeping me out of the Presidio and supporting any of the associated organizations. The combination of large sets of dogs brought in by professional walkers with the already large number of off leash dogs will so completely undermine the experience of enjoying a beautiful urban park that it's hard to imagine who but a few dog owners will choose to visit.

Thanks for your consideration of public comments. Cheers,

Karl Young
[REDACTED]

--

Karl Young
[REDACTED]

From: [stan zeavin](#)
To: [Pelka, John](#)
Subject: oppose commercial dog walking
Date: Friday, January 25, 2013 4:07:38 PM

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

dear sir,

i strongly urge the presidio trust not to invite the commercial dog walking industry into section B of the presidio. commercial dog walking has never been legally allowed on national parks land. the extra staff needed, and, the loss of revenue due to an expected drop in visitors will necesssarily be picked up by the american taxpayer.

PLEASE SAY NO!

thank you,

stan zeavin


From: [JoAnn Zlatunich](#)
To: [Pelka, John](#)
Subject: Commercial Dog Walking Comments
Date: Friday, February 22, 2013 9:59:58 AM

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

Dear Mr. Pelka,

As park supporters we have a keen interest in preserving park resources and upholding National Park values. We are writing to offer our comments on the Presidio Trust's proposed *Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions*.

1) Commercial dog walking should not be permitted in the Presidio. By the standards of the National Park Service Management Policies 2006 and the Presidio Trust Management Plan, commercial dog walking is not an appropriate use of our National Park lands. Commercial dog walking will adversely impact public safety, environmental and scenic values, natural and cultural resources, and the avoidance of conflict among visitor use activities. Commercial dog walking is not consistent with existing plans for public use and resource management, will provide no service or benefit to any park users, and will serve only for the capital gain of private enterprises at the expense of the American public.

2) All Dog Walkers Should Be Equally Limited. All dog walkers within the Presidio should be equally limited to a number of dogs that can be reasonably managed in a manner which is consistent with all Federal regulations, consistent with sound principles of land use planning and management, and in keeping with the vision and objectives as set forth in the Presidio Trust Management Plan.

3) We support the revised disposal conditions. Regulations that require the removal and appropriate disposal of dog waste should be adopted and implemented as soon as possible.

Most sincerely,

Matthew & JoAnn Zlatunich

A black rectangular redaction box covering the signature area.

Matthew Zlatunich



January 20, 2013

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

Dear Mr. Pelka,

As an avid supporter of the Presidio, the GGNRA and all our National Parks I am deeply concerned about the Presidio Trust's proposed *Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions*. It is perplexing to me why the Trust is claiming a need to *limit* commercial dog walking when there are already regulations in place that prohibit such activity, specifically 36 CFR 1005.3, 1005.6, and 1005.13. This type of commercial exploitation is a non-compatible use that will compromise the nature and characteristics of the Presidio and may cause significant physical damage to it. Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will adversely impact park resources, and will serve only for the capital gain of private enterprises at the expense of the American public.

In my own personal experience, I have had too many negative encounters with dog walkers within the Presidio, both recreational walkers and handlers with large groups of dogs. I have been barked at, snarled at, chased and bitten. Often times these encounters have left me with an accelerated heart rate and an adrenaline rush that altered my mood from peaceful contemplation to frustration and disgust. There are now areas of the Presidio that I avoid because of the predominance of dogs.

If commercial dog walking is permitted within the Presidio more of the trails and open spaces will be dominated by dog walkers and the commotion and problems that they generate, the ambiance of the Presidio will be that of a dog park, and the National Park experience will be diminished for all.

Sincerely,

Matthew Zlatunich



PRESIDIO TRUST PROJECT SCREENING FORM

Filing of Project Screening form is in compliance with Section 1010.1(a) of the Presidio Trust's Regulations implementing the National Environmental Policy Act and Section VIII of the Programmatic Agreement among the Presidio Trust, National Park Service, the Advisory Council on Historic Preservation and the California State Historic Preservation Officer regarding the Presidio Trust Management Plan and various operation and maintenance activities for Area "B" of the Presidio of San Francisco, Golden Gate National Recreation Area, and pursuant to Section 106 of the National Historic Preservation Act of 1966, as Amended.

(To be completed by N² Division only)

Submittal Date 11/13/2012 Project No. 13-009

NHPA / NEPA

PART I

A. GENERAL INFORMATION

Project Title:	Public Use Limit on Commercial Dog Walking		
Project Location / Site:	Parkwide		
Planning Area:			
Major / Minor Work Order			
Proposed Start	7/1/2013	Proposed Completion	
Project Manager / Title	Tia Lombardi		
Trust Department	Planning Department		
Phone Number	ext. 7615	Fax Number	

B. PURPOSE AND NEED

Describe below the reason for proposing the project at this time and what the project hopes to accomplish.

The Presidio Trust (Trust) is proposing a public use limit on commercial dog walkers (those persons who are walking four or more dogs at one time for payment) in Area B of the Presidio. The limit will require any commercial dog walker walking four or more dogs at one time in Area B to possess a valid Commercial Dog Walking permit obtained from the City and County of San Francisco (City). Commercial dog walkers with four or more dogs at one time in Area B will be required to comply with the City permit as well as those rules and regulations otherwise applicable to Area B. Terms and conditions of the City permit include receiving training, following safe practices for dog care, having insurance, and limiting the number of dogs a commercial dog walker may walk at once to eight. The proposal is expected to improve visitor and dog safety and protect resources in Area B.

C. WORK PLAN SPECIFICS

Describe below how the project would be implemented. Be as specific as possible about dates and methods. The form must include a project location map and the following attachments as needed: site plans, design and/or construction drawings, photographs, cut sheets, other graphics.

The limitation will go into effect no later than July 1, 2013, the latest operative date of the City's Commercial Dog Walking ordinance. Permittees will be obliged to carry his or her permit while walking dogs and produce the permit for inspection upon request by U.S. Park Police. Anyone violating the limitation could face punishment as provided by law. 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 restriction in areas where dog walking is a high-use activity.

D. PROJECT COORDINATION

If implemented, would the project:

1.	Require a Building Permit and/or an Excavation Clearance?	No
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PRESIDIO TRUST PROJECT SCREENING FORM

If implemented, would the project:

2.	Require outside review/consultation? e.g. California Environmental Quality Act (CEQA), Regional Water Quality Control Board (RWQCB), US Fish and Wildlife Service (USFWS), or Native American tribes.	No
3.	Be within Area A or have the potential to affect Area A lands, and require National Park Service notification? <i>if "Yes", explain here:</i> In its draft Dog Management Plan/Environmental Impact Statement (EIS), which is currently being supplemented, the NPS has proposed a permitting system for commercial and private dog walkers who walk four or more dogs at one time in the Golden Gate National Recreation Area (GGNRA). (Draft EIS Appendix F: Special Use Permit). The NPS permitting system would not be implemented until a negotiated rulemaking process is completed and a comprehensive special regulation for dog walking at GGNRA is adopted. The Trust's proposed rule has the potential to lead to a slight increase in dogs at Crissy Field where permits are not currently required. The City's Animal Care and Control (ACC) Department, the agency responsible for implementing the City's ordinance on City park property, anticipates that approximately 10 percent of the City's commercial dog walkers will initially avoid obtaining a City permit (personal conversation with Kat Brown, Deputy Director, November 2, 2012). During any given time of day, Trust staff estimates that there are generally between 10 to 20 commercial dog walkers walking their dogs within Area B. GGNRA staff estimates that typically 3 commercial dog walkers are present on Crissy Field with between 4 and 6 dogs each, often off-leash (Draft EIS, p. 276). Therefore, relying upon the ACC Department's figures, Crissy Field could witness an increase of 1 to 2 commercial dog walkers at any given time of day, which could increase visitor incidents related to dogs, and demand more park maintenance. Any environmental impact would be short-term and would cease when GGNRA permit provisions for commercial dog walkers are in place.	Yes
4.	Disturb soil in the drip line of a building? If so, has the remediation program for lead-based paint soil been initiated?	No
5.	Would this project generate controversy or questions from the public, and hence require public outreach and education? Does it require notice in the Presidio Post? <i>if "Yes", explain here:</i> The public will be notified of the rule through the Trust's eNews, publication in the Federal Register, posting on the Trust's website and other means, and will be encouraged to provide comment through the Trust's rulemaking and Trust Board's decisionmaking processes. Prior to implementation, the Trust will conduct a public outreach and education campaign to alert dog walkers and the public about the use restriction. Signs will also be posted and handouts will be provided to notify dog walkers of the restriction in areas where dog walking is a high-use activity.	Yes No
6.	Be within an environmental land use control zone? <i>If unknown, consult the Environmental Protection Specialist at 561-2756</i>	No
7.	Have design components (such as aesthetic/visual features, architectural/interior design elements, designed landscape components or special maintenance/sustainability considerations) that do not give rise to potential environmental effects, but may require additional review? <i>If unknown, consult the Design Review Committee Coordinator at 561-5367</i>	No

E. ALTERNATIVES CONSIDERED

*Describe below all alternatives considered including timing, cost, potential environmental effects, and/or logistical issues that influenced the rejection of each alternative. **"No Action" should always be one alternative considered.** Proposals that do not document alternatives considered will be returned to the Project Manager for further information*

1. Require no permit (no action) - Would increase commercial dog walking in Area B as some dog walkers would avoid the permit fees and requirements and the limit on the number of dogs they can walk at once in the City.

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2. Require Trust-issued permit - Would impose undue burdens on permittees without achieving any additional environmental benefits.
3. Delay permit requirement until NPS adopts permitting system for Area A - Would be uncertain as to when a negotiated rulemaking process is completed and a comprehensive special regulation for dog walking at GGNRA is adopted. In the interim, would not reduce possible conflicts between users, protect natural resources, and maintain public safety. Upon the completion of the NPS rulemaking, the Trust may amend its proposed rule to recognize GGNRA permits as valid within Area B among other permits, or to accept GGNRA permits exclusively.

F. CONSULTATION

Early consultation with the N² and resource staff will expedite the review process. Describe below communication with Trust resource specialists or input from outside agencies or experts. Any potential environmental impacts identified must be discussed with the relevant staff specialist.

The following individuals were contacted during the course of preparation of the public use limit:

- Supervisor Scott Wiener, San Francisco Board of Supervisors, District 8, City and County of San Francisco
- Jason Wu, Major, SFFO Commander at United States Park Police
- Shirwin Smith, Management Assistant, Golden Gate National Recreational Area
- Nancy Stafford, Co-Director, San Francisco Professional Dog Walkers Association (PRO DOG)
- Sally Stephens, Chair, San Francisco Dog Owners Group
- Martha Walters, Chairwoman, Crissy Field Dog Group.

PART II

"Yes" answers must be accompanied by an explanation of how the potential impact will be avoided. Justify "No" answers with an explanation when needed.

If implemented, could the project:

1.	Affect a known historic property, an archeologically sensitive area, cultural landscape or other National Historic Landmark District contributing feature?	No
<i>If unknown, consult the Historic Compliance Coordinator</i>		
<i>Explain:</i> The public use limit on commercial dog walking would reduce impacts due to dogs (digging, trampling, erosion) in areas of sensitive cultural resources where there is high dog use activity, such as El Polin.		
2.	Destroy, remove or replace historic fabric?	No
<i>Explain:</i>		
3.	Introduce, reintroduce or remove non-historic elements (physical, visible, audible, and atmospheric) of a historic structure or environment?	No
<i>Explain:</i>		
4.	Cause deterioration of historic fabric, terrain or setting?	No

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Explain:

5.	Substantially alter any ground cover or vegetation and/or diminish habitat? Affect an endangered, rare or threatened species?	No
<i>Explain:</i> The public use limit on commercial dog walking would reduce impacts to soils and vegetation caused through physical damage (such as trampling, digging, and dog waste). Impacts to wildlife (due to barking and chasing) and associated habitat within easily accessible off trail areas, such as east of the Ecology Trail would also be reduced. Dogs in Area B are prohibited in areas with sensitive habitat or endangered or threatened species.		
6.	Attract animal or insect pests?	No
<i>Explain:</i>		
7.	Inhibit surface water drainage, alter the landscape topography, lead to increased runoff or erosion or compromise slope stability?	No
<i>Explain:</i> The public use limit on commercial dog walking would reduce impacts on soils (trampled vegetation and soil erosion) due to overuse in popular areas, such as lower West Pacific and the Ecology Trail.		
8.	Involve handling and/or storage of hazardous substances?	No
<i>Explain:</i>		
9.	Degrade surface or ground water quality? Substantially alter the type of wastewater generated to the sanitary sewer system or storm drainage?	No
<i>Explain:</i> The public use limit on commercial dog walking would decrease the potential for nutrients and pathogens from dog waste to enter water bodies (such as Mountain Lake from dog activity along West Pacific).		
10.	Affect wetland, riparian or coastal habitat?	No
<i>Explain:</i> Dogs in Area B are prohibited in wetland areas.		
11.	Be inconsistent with existing or formally proposed land use plans or policies (i.e. the Presidio Trust Management Plan and Mitigation Monitoring Enforcement Program, Vegetation Management Plan etc.)?	No
<i>If unknown, consult the Environmental Protection Specialist</i>		

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Explain:
 The proposed public use limit is consistent with the following management objectives in the PTMP relevant to dog management:

- Provide for safe and enjoyable recreational use of the Presidio.
- Identify and protect sensitive wildlife species, and restore and maintain their habitats.
- Provide diverse opportunities for both passive and active recreation.
- Maintain an atmosphere that is open, inviting and accessible to visitors.
- Consider activities best suited to the Presidio.
- Balance recreational opportunities with resource protection. To achieve this balance, consider the type and level of visitor use that can be accommodated while sustaining the desired resource and visitor experience conditions.

12.	Impact current or planned visitor services? Alter current visitor access (parking, trails, roads, etc.)?	No
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Explain: The public use limit on commercial dog walking would reduce conflicts in areas where there are a high concentration of dog walkers among other visitors who engage in a variety of activities, such as the Ecology Trail and the West Pacific Trail.

13.	Greatly increase the demand for parking?.....	No
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Explain:

14.	Substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians and bicyclists?	No
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Explain:

15.	Substantially increase vehicle emissions or emissions of other air pollutants? Generate nuisance dust or odors?.....	No
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Explain:

16.	Perceptibly increase the background noise levels or expose people to loud noise?.....	No
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Explain:

17.	Substantially increase the amount of energy or water used? Use sustainable materials and/or appliances designated in the Presidio Green Building Guidelines?	No
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Explain:

18.	Substantially increase the amount of waste generated?	No
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Explain:

19.	Increase light or glare?	No
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Explain:

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20.	Block an existing view, be visually intrusive or contribute to a degraded visual condition?	No
<i>Explain:</i>		

21.	Maintain or create a public or employee safety or health hazard?	No
<i>Explain:</i> The public use limit on commercial dog walking would reduce public and employee safety concerns related to encounters with unruly or aggressive dogs.		

22.	Create or contribute to a fire hazard or increase the demands for fire department services? Increase demand for police services or create an attractive nuisance?	No
<i>Explain:</i> The public use limit on commercial dog walking would reduce the demand for law enforcement activities pertaining to dog management, including resolving conflicts between dog walkers and other user groups, giving written or verbal warnings or issuing citations to dog walkers not complying with the regulation, and preparing and filing reports related to dog and visitor incidents.		

Comments, Questions and Suggestions:

Did you find this new format user-friendly? Yes No
 Why?

Sampling of references used in the GGNRA Dog Management Plan/draft Environmental Impact Statement (DEIS), Jan. 2011 (for a complete listing please refer to pages 1743-1769 in the DEIS)

Reference/Study	Citation	Study summary	Examples of Use in DEIS
Wildlife			
Banks, P.B., and J.V. Bryant	2007. "Four-legged Friend or Foe? Dog Walking Displaces Native Birds from Natural Areas." <i>Biology Letters</i> 3:611–613. Letters [doi:10.1098/rsbl.2007.0374]	An Australian study that looked at dog walking on bird abundance. The study found that dog walking leads to a 35% reduction in bird diversity and 41% reduction in abundance, both in areas where dog walking is common and where dogs are prohibited.	<p>If shorebirds are unable to acclimate to dog or human disturbance, they may no longer reside at a site, or may flush. This can result in energy loss, morbidity, reduced reproductive success, or death (p. 16).</p> <p>Local wildlife does not become habituated to continued disturbance (p. 797).</p> <p>Birds react when dogs accompany walkers. Even dogs on-leash can cause displacement and decrease local bird fauna (p. 798).</p> <p>Ground-dwelling birds have been shown to be most affected by dogs (p. 1115).</p>
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." <i>Urban Ecosystems</i> 9(2):51–66. April 2006.	Canadian study that found that dogs did not impact bird and small mammal diversity or abundance in three habitats of urban parks. The study looked at differences between on-leash and off-leash impacts, but did not evaluate sites without dogs, which would be necessary for a baseline comparison of overall impact from dogs, or impacts to biodiversity. Authors noted that other factors may have obscured dog impacts in the study.	<p>One study concluded that off-leash dogs have no effect on the diversity or abundance of small mammals or birds in urban parks because these species are tolerant of moderate levels of human activity (p. 30, 797, 1115).</p> <p>Even though leash laws have been found in certain urban parks to have no effect on protecting biodiversity, the use of leashes could restrict dog use to a narrower corridor, minimizing the influence of dogs (p. 800).</p>
George, S.L. and K.R. Crooks	2006. "Recreation and Large Mammal Activity in an Urban Nature Reserve." <i>Biological Conservation</i> . 133:107-117. November.	Study done in southern California on displacement of bobcats, coyotes, and mule deer in response to various types of human recreation, including dog walking. Bobcat, and to some degree coyotes, displayed a response to recreation, including a temporal	Animals most affected by dogs include deer, small mammals and birds, but some canids and larger mammals such as bobcats can also be affected by dogs (p. 796).

Reference/Study	Citation	Study summary	Examples of Use in DEIS
		<p>response to dog walking. They indicated this may suggest benefits from restricted hours for dog walking, and better enforcement of closed areas for other kinds of recreation.</p>	
Lafferty, K.D.	<p>2001a “Birds at a Southern California Beach: Seasonality, Habitat Use, and Disturbance by Human Activity.” <i>Biodiversity and Conservation</i> 10: 1949–1962.</p>	<p>Study done in California on the impact of human recreation on shorebirds. Results indicated that birds were disturbed to some degree by humans, and that this disturbance was proportionally higher for dog disturbance, due to some dogs chasing birds.</p>	<p>Although leashing makes it difficult for dogs to chase birds, leashed dogs can still disturb birds (p. 29, 1114).</p> <p>Dogs, particularly off-leash dogs, increase the radius of human disturbance beyond what it would be in the absence of a dog (p. 540, 795).</p> <p>Flocking birds in open habitats, like beaches, are more vulnerable to disturbance than a single bird in dense cover (p. 798).</p> <p>Even if dogs don’t kill birds directly, disturbances may result in birds suspending feeding, or expending energy in flight, motion, and vigilance, and some dogs will actively chase birds for an extended time period (p. 798).</p> <p>Disturbance may vary depending on season (p. 798).</p> <p>Leash requirements would reduce the probability of dogs disturbing birds (p. 898, 910, 1040).</p>
Lafferty, K.D.	<p>2001b. “Disturbance to Wintering Western Snowy Plovers.” <i>Biological Conservation</i> 101(3):315–325.</p>	<p>Similar study as Lafferty 2001a, but focused on the impacts of disturbance on WSP. Plovers do not acclimate to disturbance, and are very sensitive to dogs on the beach.</p>	<p>Plovers take flight more readily and expend more energy when approached by dogs than by humans on foot, and flush at a farther distance (p. 253).</p> <p>Wintering WSPs reacted to disturbance at half the distance that was reported for breeding WSPs (p. 798).</p>

Reference/Study	Citation	Study summary	Examples of Use in DEIS
Lenth, B.E., R.L. Knight, and M.E. Brennan	2008. "The Effects of Dogs on Wildlife Communities." <i>Natural Areas Journal</i> 28:218–227.	Study on the impacts of dogs in areas that prohibit dogs and those that allow dogs off-leash in Colorado, using four measures of wildlife activity. The presence of dogs correlated with altered habitat utilization of many wildlife species, including mule deer and small mammals. Dog presence may also alter carnivore behavior.	<p>Dog presence has been correlated with altered use of habitat by wildlife (p. 28, 796).</p> <p>Animals that are prey of wild canids may perceive dogs as predators and may have non-lethal alterations in physiology activity, and habitat use when dogs are present (p. 29, 794, 1114).</p> <p>Lenth et al. have suggested that trails should be kept dog free or with restricted dog use to protect against the ecological impacts on wildlife communities (p. 541).</p> <p>Dogs often defecate very soon after arriving at a trail, and many visitors do not go far beyond the trailhead with dogs (p. 540, 796).</p> <p>Small mammals have exhibited reduced activity within 50 m of trails in areas with dogs, compared to areas without dogs (p. 796).</p> <p>Trails with abundant dog scent could appear to carnivores to be linear dog territories, necessitating increased vigilance and activity, and native carnivores may avoid areas where dog use is concentrated (p. 796).</p> <p>Species preyed upon by canids may be sensitive to the presence of domestic dogs (p. 796).</p> <p>The presence of dogs may impact the northern spotted owl by temporarily affecting the abundance of the dusky woodrat, a primary prey item of the owl (p. 1271).</p>
Miller, S.G., R.L. Knight, and C.K. Miller	2001. "Wildlife Responses to Pedestrians and Dogs." <i>Wildlife Society Bulletin</i> 29(1):124–132.	Study of the impact of a pedestrian, pedestrian with a dog, and a dog alone on several wildlife species. Results indicated that depending on the species, some species	Animals that are prey of wild canids may perceive dogs as predators and may have non-lethal alterations in physiology activity, and

Reference/Study	Citation	Study summary	Examples of Use in DEIS
		did not have a larger area of influence from a dog disturbance, while other species did.	habitat use when dogs are present (p. 29, 796). Dogs, particularly off-leash dogs, increase the radius of human disturbance beyond what it would be in the absence of a dog (p. 29, 540, 795).
Riley, S.P.D., J. Foley, and B. Chomel	2004. "Exposure to Feline and Canine Pathogens in Bobcats and Gray Foxes in Urban and Rural Zones of a National Park in California." <i>Journal of Wildlife Diseases</i> 40(1):11–22.	Study completed in GOGA on the prevalence of pathogens in wild felids and canids in GOGA and the relationship of these pathogens to contact with people and pets. The authors found that interactions with urban environments increased the likelihood for pathogens to be present in some species, including foxes and bobcats.	In the GGNRA, Riley et al. showed that proximity to urban areas or contact with humans can increase the risk of exposure to disease for wild carnivore populations, including foxes and bobcats (p. 29, 800). The collection of feces and the reduction in feral and unaccompanied domestic animals could reduce the risk of transmission of many diseases (p. 29).
Russell, W., J. Shulzitski, and A. Setty	2009. <i>Case Study: Evaluating Wildlife Response to Coastal Dune Habitat Restoration in San Francisco, California.</i> <i>Ecological Restoration</i> . 27(4): 439-448.	Study on the impacts of ongoing dune restoration at Fort Funston, including wildlife responses to visitor use of the area. Data was collected at four sites	Fort Funston is the largest of several remnants of the San Francisco dune complex (p. 233). The NPS implemented a bank swallow restoration program in 1991 that restored dune vegetation and reduced human impacts to the coastal bluffs and dunes (p. 233). Non-native trees and shrubs, such as Monterey cypress, eucalyptus, and wattle were also planted as strong baffles to dune forming winds (p. 244). Heavy off-leash dog use increases the deterioration of native dune communities (p. 575). The study detected two to three times more wildlife in the restricted/restored habitat compared to the unrestricted/unrestored habitat (p. 797). Dog-wildlife interactions, including dogs

Reference/Study	Citation	Study summary	Examples of Use in DEIS
			barking in close proximity to a red fox whose behavior was unchanged, and dogs barking and chasing after a pocket gopher on three separate occasions (p. 797).
Special-Status Species			
California Coastal Commission	2008. <i>Nonpoint Source Watershed Assessment: James Fitzgerald Marine Reserve Critical Coastal Area</i> . Includes description of Martini Creek Watershed restoration December.	Watershed assessment that includes Martini Creek watershed. This area is habitat for Hickman’s Potentilla, as identified in the report.	Other projects that could benefit and enhance resources (coastal scrub/chaparral, wildlife, special status species etc.) include the Martini Creek watershed assessment (p. 684, 962). The Martini Creek watershed improvements could benefit Hickman’s potentilla through the development of an action plan to address potential and unknown nonpoint source pollution impacts and water quality around the Fitzgerald Marine reserve Critical Coastal Area (p. 1339). The Martini Creek watershed is dominated by coastal scrub habitat and is host to the only remaining viable population of Hickman’s potentilla (p. 1340).
Dawson, M.N., J.L. Stanton, and D.K. Jacobs	2001. “Phylogeography of the Tidewater Goby, <i>Eucyclogobius newberryi</i> (Teleostei: Gobiidae), in Coastal California.” <i>Evolution</i> 55(6):1167–1179.	Study on the phylogenetic relationship between different populations of tidewater gobies to examine the molecular diversity of the groups, and look at the range expansion to determine the phylogeography of the species.	The population of tidewater gobies in Rodeo Lagoon is isolated from other populations and is genetically distinct (p. 249, 1165).
Lafferty	See above		
Lenth	See above		
NPS	2006h “Crissy Field Restoration Project Summary of Monitoring Data 2000–2004.”	Report of data collected from monitoring of Crissy Field Marsh following tidal	Monitoring at Crissy Field marsh revealed water quality issues in the marsh, including low

Reference/Study	Citation	Study summary	Examples of Use in DEIS
	January 2006.	restoration. Includes monitoring of the WSP, which was observed roosting on the beach of the WPA.	<p>dissolved oxygen levels (p. 227).</p> <p>Following restoration efforts, nearly 100 species of birds have been documented using the tidal marsh at Crissy Field, including migrating ducks, pelagic birds diving for fish, and shorebirds (p. 240).</p> <p>During the long-term monitoring from 1994 to 2006, 48 off-leash dogs were observed chasing western snowy plovers (p. 1250).</p>
USFWS	1984. San Bruno Elfin and Mission Blue Butterflies Recovery Plan. Portland, Oregon.	The USFWS's recovery plan for the San Bruno Elfin and Mission Blue butterflies. Plan covers physiology, history, habitat, distribution, and reasons for decline, as well as overview of recovery plan. The plan does not identify all areas in the park with MBB habitat.	<p>The USFWS has prepared a recovery plan for the San Bruno Elfin Butterfly and MBB to protect, maintain, and enhance these populations (p. 245).</p> <p>At Milagra Ridge, GGNRA managers follow recommendations from the recovery plan by periodically monitoring the population (p. 247).</p> <p>Within the study area, the MBB has been documented at the Marin Headlands, Oakwood Valley, Alta Trail, Milagra Ridge, Sweeney Ridge, Fort Baker, and Tennessee Valley (p. 248).</p> <p>The recovery plan for the San Bruno Elfin and MBB call for the protection of essential habitat and prevention of habitat degradation, and enhancement of habitat when possible, including restoring habitat in the historical range (p. 248,).</p> <p>Projects that enhance coastal scrub/chaparral habitat, the MBB, and other wildlife include the recovery plan. The beneficial impacts of trail rehabilitation should reduce some of the adverse impacts of Alt A (p. 684, 688, 962).</p> <p>The objectives of this plan are to protect</p>

Reference/Study	Citation	Study summary	Examples of Use in DEIS
			<p>maintain, and enhance existing populations of these butterflies, therefore they should provide beneficial impacts to these butterflies (p. 1118, 1124).</p> <p>Management activities that will benefit the MBB include protecting essential habitat outside targeted park locations through agreements with landowners, and through easements. The plan also includes restoration of historic coastal scrub by controlling non-native species that threaten the host and nectar plants of the MBB and preventing degradation from herbicides, and off-road vehicle use (p. 1124, 1128, 1139, 1146)</p>
USFWS	2002. <i>Recovery Plan for the California Red-Legged Frog</i> (<i>Rana aurora draytonii</i>). Region 1, Portland, Oregon. May 2002.	Recovery plan for the CRLF. Includes a description of the species life history, threats and reasons for decline, and a section on associated species, including the SF garter snake. Lastly, the report outlines the recovery plan and actions.	<p>The CRLF uses diverse habitat elements, including aquatic, riparian, and upland habitats. Breeding sites are located in a variety of aquatic habitats, including streams, deep pools, backwaters, ponds, marshes, sag ponds, dune ponds, and lagoons (p. 251).</p> <p>The decline of CRLF (the primary prey of the SFGS) and the introduction of exotic predators such as bullfrogs into aquatic habitats are both threats to the SFGS (p. 252).</p>

Reference/Study	Citation	Study summary	Examples of Use in DEIS
USFWS	2005b <i>Recovery Plan for the Tidewater Goby</i> (<i>Eucyclogobius newberryi</i>). Volume I, p. 199. U.S. Fish and Wildlife Service, Portland, Oregon.	The USFWS's recovery plan for the tidewater goby. Plan covers life history and ecology, abundance and trends, the reason for decline, and current threats. Lastly, report recovery strategy, goals and objectives.	<p>The tidewater goby is a small benthic fish that occurs in California coastal lagoons with salinity less than 10 ppt. The males care for embryos for 9-11 days until they hatch, rarely if ever emerging from the burrows to feed (p. 249).</p> <p>Because these fish do not enter the ocean, each population is isolated from each other. Various genetic markers demonstrate that pronounced differences in the genetic structure of tidewater gobies exist, and that tidewater gobies in some locations are genetically distinct (p. 249).</p> <p>A recovery plan for the tidewater goby calls for the protection and enhancement of currently occupied habitat, including managing freshwater inflow, exotic species, channelization, water quality, and human impacts; development of strategies to prevent further habitat loss, monitoring/research, more public awareness, and possible translocation (p. 249, 1165, 1171).</p>
USFWS	2007a. <i>Recovery Plan for the Pacific Coast Population of the Western Snowy Plover</i> (<i>Charadrius alexandrinus nivosus</i>). In 2 volumes. California/Nevada Operations Office, U.S. Fish and Wildlife Service, Sacramento, California.	The USFWS's recovery plan for the WSP. Plan covers life history and ecology, habits and migration, and a description of the population status and trends, on the California coast. Report also includes a discussion of the threats to the WSP, including a section on dogs. Lastly, report covers conservation efforts, and recovery goals and objectives.	<p>Dogs on beaches can pose a serious threat to WSP during the breeding and nonbreeding seasons. Unleashed pets sometimes chase snowy plovers and destroy nests. Repeated disturbances interrupt brooding, incubating, and foraging behavior of adult plovers and cause chicks to become separated from their parents, and dog disturbance at wintering and staging sites may adversely affect individual survivorship, affecting the species at a population level (p. 798, 1240).</p> <p>Dogs can cause a temporary abandonment of shorebird nests containing eggs or young, or</p>

Reference/Study	Citation	Study summary	Examples of Use in DEIS
			<p>crush eggs and prey on young (p. 799).</p> <p>The recovery plan indicates that monitoring and management of the WSP breeding, wintering, and migrating habitat to maximize survival and productivity and reduce disturbance to this species is important to recovery (p. 1240).</p> <p>Along the California coast, WSPs have been extirpated from 33 of 53 nesting sites since 1970, and now number approximately 1400 birds (p. 1241, 1248).</p> <p>Oil spills have historically affected plovers at the GGNRA. WSPs foraging along the shoreline and in beach wreck at the high tide line, and thus are at risk to direct exposure during oil spills (p. 1242).</p> <p>Alternative B would provide consistency with the recovery plan (p. 1243, 1252).</p> <p>At Ocean Beach, seasonal closures designed to protect WSPs are frequently violated and harassment (flushing) of shorebirds by dogs and people is fairly common (p. 1250).</p> <p>Alternative E is not consistent with the recovery plan (p. 1254).</p> <p>Because a two mile length of beach (the SPPA) would not be available to dogs, Alt. C would provide protection for WSPs and consistency with the recovery plan (p. 1255, 1259).</p> <p>Alternative D would provide protection for the WSP from dogs and consistency with the recovery plan (p. 1259).</p>

Reference/Study	Citation	Study summary	Examples of Use in DEIS
Visitor Use and Experience			
NPS	2010j. <i>Mori Point Restoration and Trail Plan</i> . Accessed January 26, 2010: http://www.nps.gov/goga/parkmgmt/moripointplan.htm .	An EA for the proposed Mori Point Restoration. EA discussed impacts to visitor use and experience, as well as several other resources.	<p>The plan includes preserving/restoring habitat by reducing threats to native plant communities and natural processes, ensuring habitat connectivity between upland and wetland areas, and developing a safe/sustainable trail system to improve recreational experiences, aesthetics, and reduce impacts on park resources (p. 426, 605, 1407).</p> <p>The plan includes development of a safe and sustainable trail system to improve recreational experiences and guide visitors away from disturbed areas, restoration areas, and endangered species habitat areas. The plan would decrease runoff and beneficially impact water quality (p. 524, 1531).</p>
Roberts, N.S.	2007. <i>Visitor/Non-Visitor Use Constraints: Exploring Ethnic Minority Experiences and Perspectives</i> . Final Report, Golden Gate National Recreation Area, National Park Service. San Francisco State University. March 2007.	Focus group report prepared for GOGA by San Francisco State University that sought to understand how to improve people's connection to the park. Report describes the racial, ethnic, and cultural patterns of use and non-use of GOGA, and constraints to visitation.	<p>For some visitors, dogs off-leash create fear, and some people just prefer to avoid encounters with dogs. Dog walkers can indirectly affect the aesthetics of the park, as well as visitor experience, when they do not pick up their dogs' waste on trails, beaches, or in picnic areas (p. 30, 1405).</p> <p>The results of the study indicated that dogs were a problem mentioned by all Latino and Asian groups. Research found that these minority groups mentioned dogs, especially dog waste, as a barrier to park visitation, and overall, Latinos were the most concerned with dog owners' lack of concern or control of their dogs (p. 31, 281).</p> <p>Dog owners assume that other people will like the owners' dogs as much as they do; dog owners let their dogs approach other people</p>

Reference/Study	Citation	Study summary	Examples of Use in DEIS
			<p>without first asking their permission; and owners do not react to their dogs begging for other people’s food. “Every time we go to picnic the dogs come and eat our food, they wander around, and the owners don’t do anything. The same with their bowel movements! The owners don’t clean after them” (p. 282).</p>
<p>Social Research Laboratory/NAU</p>	<p>2002a. “Golden Gate National Recreation Area Advanced Notice of Proposed Rulemaking Public Comment Analysis.” Northern Arizona University, Flagstaff, Arizona. August.</p>	<p>Report from the Social Research Laboratory at Northern Arizona University with analysis of the public comment period for the ANPR.</p>	<p>In response to the ANPR in January 2002, the park received 8,580 documents and the results were published in a public comment analysis report. In this report, 71 percent of public comments favored option B. Of the 71 percent, the majority were SF residents (88 percent). Twenty-eight percent of comments favored alt. A, and respondents from out of state overwhelmingly voted for option A (96 percent). Fort Funston, Crissy Field, and Ocean Beach were the sites most frequently mentioned by those preferring either option A or option B. The public made several suggestions for management (p. 8).</p> <p>Of the 8,580 comments received, 71 percent of the comments supported some off-leash dog walking in the park. Comments stated that off-leash dog walking provided exercise and sociability benefits for dogs and owners (p. 1403).</p> <p>In additional input from the GGNRA ANPR process, 13 percent of comments received cited feelings of discomfort around or fear of off-leash dogs and expressed the opinion that off-leash dogs were dangerous to children. A similar percentage also stated that dogs in general make the park unsafe for visitors (p.</p>

Reference/Study	Citation	Study summary	Examples of Use in DEIS
			1404).
Social Research Laboratory/NAU	2002b. "Public Opinion Research Telephone Survey Regarding Golden Gate National Recreation Area Pet Management Issues." Technical Report, Northern Arizona University. December.	Technical report completed by the Social Research Laboratory at Northern Arizona University on the results of a phone survey on pet issues at the GGNRA.	<p>The survey was conducted with a random cross section of people in several counties to provide a general overview of public support/opposition to off-leash dog walking. Results of the telephone survey showed that 28 percent of respondents owned or cared for one or more dogs. Fifty percent of dogowners had taken their dog(s) to the GGNRA and 20 percent had also hired a commercial dog walker to walk their dog(s) at GGNRA.</p> <p>Seventy-one percent of all respondents supported and 23 percent opposed the current NPS regulation for walking dogs on-leash at most GGNRA sites and prohibiting off-leash dog walking. Results indicated support for the existing NPS pet regulation was consistent throughout the four counties and every demographic subset.</p> <p>Park visitors with dogs typically use GGNRA for dog walking because of leash laws in the surrounding areas that prohibit or limit off-leash dog walking, and because they prefer to visit areas with access to beaches and the shoreline. Twenty-eight percent of the respondents to the survey were dog owners or dog caregivers, 50 percent of these dog owners have walked dogs in GGNRA; 75 percent of San Francisco county and 69 percent of Marin county dog walkers have taken dogs to GGNRA sites, compared to 44 percent of San Mateo and 29 percent of Alameda dog walkers. Among these visitors, one out of five dog walkers visited the park daily or weekly to walk dogs (p. 1403).</p>

Reference/Study	Citation	Study summary	Examples of Use in DEIS
			<p>Approximately 27 percent of all people surveyed (dog owners and non-dog owners) stated that seeing an off-leash dog added positively to their visitor experience. A total of 21 percent of all respondents support allowing off-leash dog walking on trails used by other user groups. Some respondents stated that they enjoy playing with other visitors' dogs and that dogs add to the park's visual aesthetic experience (p. 1403).</p> <p>After hearing the GGNRA mission statement, 58 percent of respondents opposed off-leash dog walking and 36 percent supported off-leash dog walking. Of those not strongly opposed to off-leash dog walking in the park, 56 percent of respondents opposed allowing off-leash dog walking on trails used by multiple user groups, such as hikers, cyclists, and horseback riders (p. 1404).</p> <p>Twenty-seven percent of visitors in the survey who had seen dogs off leash reported that off-leash dogs added to their experience and 22 percent stated dogs off leash detracted from their experience. Nearly half of visitors who had seen dogs off leash in a GGNRA site (49 percent) reported that off-leash dogs had no impact on their experience (p. 1404).</p> <p>In the survey, when minorities were asked if they supported or opposed off-leash dog walking in GGNRA sites, 39 percent of supported off-leash dog walking, and 51 percent opposed off-leash dog walking. Similarly, a total of 39 percent of low-income individuals supported off-leash dog walking and 53 percent opposed to it. Without further</p>

Reference/Study	Citation	Study summary	Examples of Use in DEIS
			information on visitation by minorities and low-income individuals and their references regarding off-leash dogs in the park, it is difficult to assess the impacts (adverse and beneficial) on this user group (p. 1405).

Sampling of sources which may be added to the Supplemental EIS based on public comment (*this is not a comprehensive listing*)

Reference/Study	Citation	Where source will be added	Study summary
Natural Resources			
Gill, J.A., Norris, K., and W.J. Sutherland	2001. <i>Why behavioral responses may not reflect the population consequences of human disturbance</i> . Biological Conservation 97:265-268.	Wildlife, Special Status Species (SSS)	An exploration into the theory that the level of response by a species is indicative of the species' accessibility and need for protection. This paper examines idea that cost of moving in response to disturbance should be weighed against nearby available habitat.
Grinnell, Joseph	1932. "Type localities of birds described from California." <i>University of California Publications in Zoology</i> , Vol. 38, No. 3:243-324.	SSS	Information on bird species found in California. Includes record of historical nesting of WSP at Crissy Field.
Pfister, C., Harrington, B.A., and Lavine, M	1992. <i>The impact of human disturbance on shorebirds at a migration staging area</i> . Biological Conservation 60: 115-126.	Wildlife	A study on the impacts of human disturbance on the capacity of a migratory bird staging area. By analyzing long-term study data, results indicated that four of seven migratory bird species showed movement in response to disturbance, and that high disturbance may reduce abundance. This could be a potential factor in long-term declines in shorebird populations.
Reed, S.E. &	2008. <i>Quiet, nonconsumptive recreation reduces protected area effectiveness</i> . Conservation Letter,	Wildlife	Study looked at the impacts of quiet and non-consumptive recreation in Northern California. Three

Reference/Study	Citation	Where source will be added	Study summary
Merenlender, A.M.	Vol. 1, pp. 146-154		native and three non-native carnivores were analyzed using scat samples to determine abundance. Study found that in areas with nonconsumptive recreation, native carnivore abundance decreased five-fold, and the presence of non-native carnivores (including dogs) increased.
Stankowich, T.	2008. <i>Ungulate flight response to human disturbance: a review and meta-analysis</i> . Biological Conservation, Vol. 141, pp. 2159-2173	Wildlife	Study that analyzed the response of ungulate wildlife to disturbance. Flight response is largely a factor of the level of the threat, type of threat, habitat, and sex and size of the group. Study also found that humans caused a greater response for ungulate wildlife than dogs.
Thoms, K., Kvitek, R.G., and C. Bretez	2003. <i>Effects of human activity on the foraging behavior of sanderlings Calidris alba</i> . Biological Conservation 109: 67-71	Wildlife	Study that looked at the impact of disturbance on foraging by sanderlings in California. Results indicated that an increase in human disturbance reduced foraging time, and that free-running dogs had the most negative impact on foraging.
USFWS	2006. <i>San Francisco Garter Snake (Thamnophis sirtalis tetrataenia) 5-Year Review: Summary and Evaluation</i> . Sacramento Field Office, Sacramento, California. September.	Wildlife, SSS	A scientific review of the SFGS recovery plan. Includes detailed review of populations in the area, and threats to SFGS.
Visitor Use and Experience			
Floyd, Dr. Myron.	1999. <i>Race, Ethnicity and Use of the National Park System</i> . Social Science Research Review. 1(2): 1-24.	Visitor Use	Review of the literature on racial and ethnic minority use of the National Park System. The paper describes four theories and the strengths and limitations of these theories. Research on race, ethnicity, and participation in outdoor recreation is also examined. The reviewed studies consistently show that racial and ethnic groups visit national parks and participate in recreation activities at differing rates, and style and pattern of park use vary among groups.
Vaske, J. and	2007. Visitor Tolerances and Standards for Off	Visitor Use	A study of visitor experience related to dogs in open

Reference/Study	Citation	Where source will be added	Study summary
Donelly, M.	Leash Dogs at Boulder Open Space and Mountain Parks. HDNRU Report No. 75. Report for Boulder Open Space and Mountain Parks, Fort Collins, Colorado State University. Human Dimensions in Natural Resources Unit		space areas in Boulder, CO indicated that a significant proportion of visitors to open areas reacted strongly to negative behavior associated with off-leash dogwalking. A group of 951 visitors, including dog owners and non-dog owners, completed questionnaires regarding their attitudes towards potentially disruptive behavior by dogs. Results indicate that negative behaviors visitors associate with dogs in nature are not just minor irritants but may potentially spoil the experience for visitors, and some visitors may completely avoid areas of high off-leash dog activity.
Arnberger, A. and Haider, W.	2007. Would You Displace? It Depends! A Multivariate Visual Approach to Intended Displacement from an Urban Forest Trail. Journal of Leisure Research. Volume: 39, Issue: 2, Pages: 345-365	Visitor Use	A dichotomous choice survey was used to explore the impact of various social conditions to intended displacement from the main trail of a recreation area in Vienna, Austria. The trail scenarios were depicted as digitally calibrated images which systematically displayed combinations of levels of crowding with different mixes of user types, group sizes, compliance behavior, direction of movement, and placement within the image. Intended displacement was measured by interviewing 237 visitors on-site. The resulting model shows that the intention to displace is influenced by six systematically controlled social factors, and the interactions between crowding and several other design variables. High visitor numbers, unleashed dogs, small group sizes, more face to face encounters, a mix of user types moving at different speeds and several combinations between them increased intentions to displace.
Kutsch, Ginger	2011. Dog Attack and Interference Survey	Health and Safety	Survey of guide (seeing-eye) dog handlers in United States and Canada experiencing interference and attacks from off-leash dogs. Approximately 44% of respondents (324 out of 744) had experienced at least one attack. Of those, 58% were attacked more than

Reference/Study	Citation	Where source will be added	Study summary
			<p>once. Of those attacked more than once, 76% reported being attacked by a dog off-leash. 80% of attacks and 83% of interference occurred on a public right-of-way such as a sidewalk or roadway.</p> <p>Following an attack, guide dogs may be unable to work because of physical injuries. A less obvious, but equally as harmful, effect occurs when guide dogs develop undesirable behaviors towards other dogs. These behaviors may be temporary or permanent but either circumstance compromises the team's ability to work safely and effectively. In the survey, 35% of respondents reported that, after the most recent attack, their dog's behavior negatively changed towards other dogs. When asked to report the biggest change(s), exactly half (50%) noted that their dog became easily distracted by other dogs; 43% became aggressive around other dogs; 43% became fearful or shy around other dogs; 25% were more worried about potential threats than working responsibly; and 11% developed a lack of confidence when working. Out of the 25% of respondents who reported negative behavior changes in their dogs after interference, most changes were similar to that of dogs that had been attacked. One exception was that dogs that had been attacked were more likely to become fearful or shy of other dogs (see the chart below for more details).</p> <p>In the more severe cases, 16% (52) of the guide dogs that were attacked were temporarily unable to work and 3% (10 dogs) were retired from service. Out of the more severe incidents of interference, 2% (15) dogs were retired from service.</p>

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 or create your own:

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? (Modify definitions as the group feels they should be modified)

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 other than dog walking at each park site? Differentiate by trail or specific locations in park sites if needed. For those where you feel comfortable making this judgment, where are these non-dog walking uses intense? Types of uses might include picnicking, walking, jogging, sunbathing, equestrian, birdwatching, photographing wildlife, scenery, watersports, etc. Any differences in the use or intensity during a particular season? 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 to dogs? (close to home, beach, unconfined, etc.). How do these elements change for on-leash vs. voice controlled dogs?

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.). How would you define a conflict?

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) proposal to impose 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.

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:

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.

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 which limit the number of dogs per commercial dog walker

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

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 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 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 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 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, which addresses commercial and recreational dog walking. The dog management plan and its accompanying environmental impact statement (EIS) are well underway. Once the plan and EIS are finalized, the NPS will initiate a rulemaking process and seek public comment on the codification of the plan's regulatory elements in the Code of Federal Regulations. A final rule is not anticipated until 2015. 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.

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.

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.”

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.

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.

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 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.

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.

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. 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.

Update: May 30, 2013

Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio and Revised Disposal Conditions

The Presidio Trust requested public comment on a proposed public use limit on persons who are walking four or more dogs at one time in Area B of the Presidio of San Francisco for payment (Commercial Dog Walkers).

The limit would require Commercial Dog Walkers in Area B to possess a valid Commercial Dog Walking permit obtained from the City and County of San Francisco (City). Commercial Dog Walkers would be required to comply with the terms and conditions of the City permit as well as those rules and regulations otherwise applicable to Area B. The Trust also proposed that throughout Area B, all dog walkers should remove pet excrement and deposit it in refuse containers. The initial 65-day comment period for the proposed use limit published November 21, 2012 ([77 FR 69785–69788](#)) was extended by 30 days at the request of the public ([78 FR 6273–6274](#)). By the close of the public comment period on February 25, 2013, the Trust had received 256 individual comments on the proposed use limit, including 9 oral comments provided at the public meeting of the Trust Board of Directors on November 29, 2012. All comments were carefully considered. [View the full record of comments >>](#)

Public Reaction to Proposed Use Limit

The comments received either express support for (49 percent) or opposition to (51 percent) the public use limit. Support for the requirement to properly remove pet waste was unanimous. Commenters in support of the public use limit maintain that commercial dog walkers have been using the Presidio for years, that commercial dog walkers provide an invaluable service to the residents of the City, and that adopting the rule is reasonable and appropriate. “Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well being of the people that live in the City” (Comment 34). “These requirements will standardize dog walking practices and provide better and safer services for dog owners and dogs living in the Presidio and adjacent City neighborhoods” (Comment 70). Many of the supporters feel that the Presidio should be viewed as a different kind of national park, as it serves a broad community of users and residents and accommodates numerous commercial interests. “We live in a densely populated area, not a true wilderness” (Comment 27). Several of those that otherwise express support believe that the maximum limit of eight dogs is too many for Commercial Dog Walkers to reasonably keep under their control.

Commenters who oppose the proposed use limit are largely “dissatisfied with the status quo” of the presence of Commercial Dog Walkers in the Presidio and wish to see the activity prohibited by enforcement of existing laws (Comment 2). They argue that commercial dog walking should be viewed as an “exploitation of park lands strictly for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience” (Golden Gate Audubon Society Conservation Yahoo Group). Others who oppose the use limits appreciate the Trust’s efforts to accommodate commercial dog walking, but are concerned that more analysis is needed to determine spillover effects in Area A (Comments 6 and 7). Still others are against the proposed use limit because they believe the Trust is targeting Commercial Dog Walkers unfairly. “I see far more problems with individual dog owners who do not know how to handle their one, or two badly behaved dogs” (Comment 199) and “individual dog owners more often believe that their dog is well behaved, under voice control, and doesn't poop, when, in fact, none of this is true” (Comment 164). Finally, there are those that do not support any changes in dog regulations. They think the proposed limit is “foolish” and a “useless and unnecessary burden on lawful commercial and entrepreneurial commerce” (Comment 233) and believe “it’s ridiculous that time and energy is

wasted on matters such as this... after hearing from the public over and over again about their love of dogs and the freedom of walking them in the Presidio..." (Comment 191). "Stop blaming dogs for all management issues!" (Comment 166).

National Park Service Letter

In its letter to the Trust, the National Park Service (NPS) states its support for the Trust's action to manage commercial dog walking, without which "a potential redistribution [of Commercial Dog Walkers] could impact the Presidio Trust's mandate to preserve and protect the park's resources" (Comment 1). The NPS disagrees, however, with the number of dogs allowed under the City permit, and argues that a limit of six dogs is less likely to impact visitor experience and safety a more reasonable number than eight. In light of response to the City's program and Trust's proposal to regulate Commercial Dog Walkers, the NPS is developing is considering developing an interim commercial dog walking permit program for its San Francisco sites that would limit the number of dogs allowed to six, which is consistent with the proposed limits specified in the alternatives that permit commercial dog walking in the NPS' upcoming Dog Management Plan/Supplemental Environmental Impact Statement for Area A and other NPS-managed lands within the Golden Gate National Recreation Area (GGNRA). Given the Trust's and NPS' shared management responsibilities within the Presidio, the NPS has asked the Trust to consider adopting the NPS' interim commercial dog walking permit system, should it be implemented, rather than that being implemented by the City.

Trust Decision

The Trust is encouraged that the NPS is considering moving forward at this time to create and implement an interim enforceable permit system-program to regulate commercial dog walking in-for the GGNRA's San Francisco sites. Rather than accepting the terms and conditions of the City's permit as initially proposed in our public use limit, we see value in a bilateral and consistent Trust/NPS approach to Commercial Dog Walker management as a way to both avoid public confusion and protect park resources within the GGNRA. Therefore, after examining all public comments and considering the new information provided by the NPS, the Trust will postpone any decisions regarding the regulation of commercial dog walking until the earlier of November 1, 2013 or the date that the-an NPS' interim commercial dog walking permit system is-may be enacted. Before taking any action, the Trust will provide the public with an additional opportunity to comment.

The Trust finds no compelling reason to delay the revised pet waste disposal regulation and will implement it as soon as possible. The Trust will provide additional refuse containers in places convenient to dog walkers to support enforcement of the regulation.

We thank you for your interest and participation in our effort to regulate commercial dog walking within Area B of the Presidio.

For Further Information Contact

Say No! to Commercial Dog Walking In the Presidio



Commercial dog walking has never been legally permitted on any of our National Park lands. However, the Presidio Trust is now proposing to allow this form of commercial exploitation within Area B of the Presidio. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands!

- **Commercial dog walking is not an appropriate use of our National Park lands.** Commercial dog walking is contrary to the purpose and mission of our National Parks and the Presidio.
- **Commercial dog walking impacts park resources and park visitors.** Commercial dog walkers, each with up to eight dogs, will negatively impact park resources and park visitors.
- **Commercial dog walking provides no service or benefit to any park users.** In fact, commercial dog walking activity will displace park visitors, of all user groups, from trails and other areas of the park.
- **Commercial dog walking serves only for the capital gain of private enterprises at the expense of the American public.** The costs of administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers will be paid for by the American tax payer!
- **Irrational Management Decision.** The Presidio Trust fully admits that illegal commercial dog walking has been responsible for damage to resources, threats to public safety, and visitor conflict, yet they now propose to invite more of this commercial exploitation into the Presidio to placate the elite of San Francisco.

Say No! Speak up now and tell the Presidio Trust to keep commercial dog walking out of our National Parks. Comments are due by January 25, 2013 and can be submitted electronically to jpelka@presidiotrust.gov

Or mail comments to: John Pelka, The Presidio Trust,
103 Montgomery Street,
P.O. Box 29052, San Francisco, CA
94129.



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San Francisco Bay Area Network Phase II Vital Signs Monitoring Plan

Working Draft

[Golden Gate image here when posted to web site!]

San Francisco Bay Area Network (SFAN)
Eugene O'Neill National Historic Site (EUON)
Fort Point National Historic Site (FOPO)
Golden Gate National Recreation Area (GOGA)
John Muir National Historic Site (JOMU)
Muir Woods National Monument (MUWO)
Pinnacles National Monument (PINN)
Point Reyes National Seashore (PORE)
Presidio of San Francisco (PRES)

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Brad Welch ~~26-16 December~~September 2003

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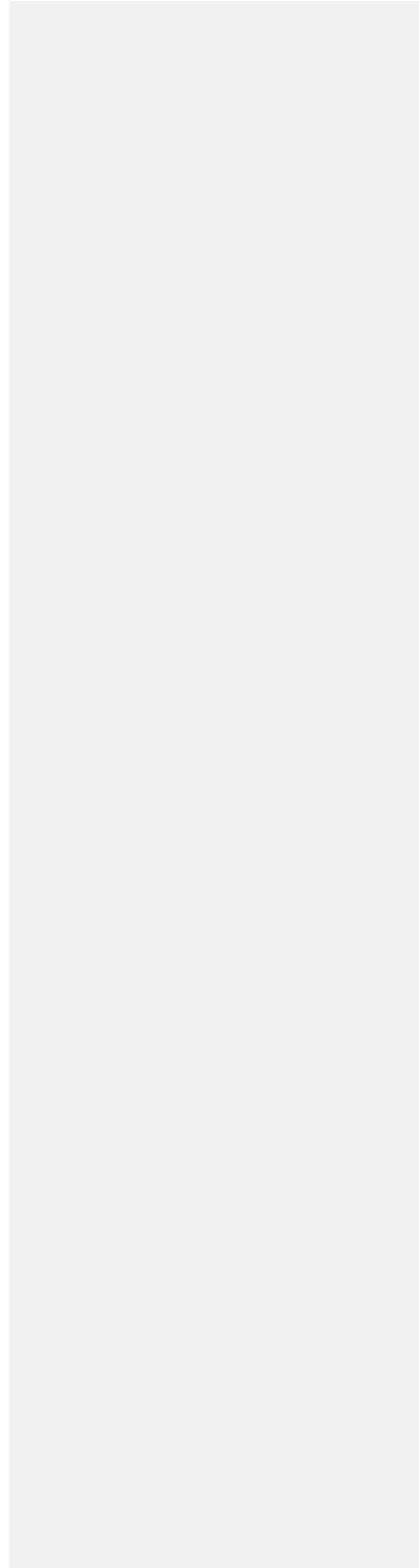
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1 **Acknowledgments**

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3 [To be completed in the report's final form.]

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1 **Executive Summary**

2
3 [To be completed in the report's final form.]

4
5 Throughout the report, references are made to supporting sections, external documents,
6 and web sites. For those references that appear as blue underlined text when the document is
7 viewed in its electronic format, a hyperlink will connect the reader to the supporting information.
8 Depress the "Ctrl" button and click the left mouse button simultaneously to follow the link. The
9 web address is supplied for web-based documents.

10 Appendices exist in a separate file (SFAN_Phase II appendicesv9.doc). Primary
11 appendices referenced in the SFAN Phase II report are listed numerically, in order of their
12 appearance in the body of the report (e.g., Appendix 1, 2, 3, etc.) Secondary appendices
13 (appendices within appendices) contained within workshop reports and other subdocuments are
14 listed alphabetically, in the order they are referenced within the subdocument (e.g., Appendix A,
15 B, C, etc.)

16 The report [Glossary](#) contains a list of monitoring terms and their definitions for the
17 reader's benefit.

18
19

1 **Chapter 1 Introduction and Background**

2
3 1.1 Purpose

4
5 **1.1.1 Justification for Integrated Natural Resource Monitoring**

6
7 Knowing the condition of natural resources in national parks is fundamental to the
8 National Park Service's ability to manage park resources "unimpaired for the enjoyment of future
9 generations ([National Park Service Organic Act 1916](#))." National Park managers across the
10 country are confronted with increasingly complex and challenging issues that require a broad-
11 based understanding of the status and trends of park resources as a basis for making decisions
12 and working with other agencies and the public to preserve and protect these resources. For
13 years, managers and scientists have sought a way to characterize and determine trends in the
14 condition of parks and other protected areas to assess the efficacy of management practices and
15 restoration efforts and to provide early warning of impending threats. The challenge of
16 protecting and managing a park's natural resources requires a multi-agency, ecosystem approach
17 because most parks are open systems, with threats such as air and water pollution, and invasive
18 species, originating from outside of the park's boundaries. An ecosystem approach is further
19 needed because no single spatial or temporal scale is appropriate for all system components and
20 processes; the appropriate scale for understanding and effectively managing a resource might be
21 at the population, species, community, or landscape level, and in some cases may require a
22 regional, national or international effort to understand and manage the resource. National parks
23 are part of larger ecosystems and natural resources must be managed in that context. (See the
24 report [Glossary](#) for a list of monitoring terms and their definitions.)

25 Natural resource monitoring provides site-specific information needed to understand and
26 identify change in complex, variable, and imperfectly understood natural systems. [Monitoring is](#)
27 [defined as the "collection and analysis of repeated observations or measurements to evaluate](#)
28 [changes in condition and progress toward meeting a management objective \(Elzinga et al.](#)
29 [1998\)."](#) Monitoring data help to define the normal limits of natural variation in park resources and
30 provide a basis for understanding observed changes; monitoring results may also be used to
31 determine what constitutes impairment and to identify the need for change in management practices.
32 Understanding the dynamic nature of park ecosystems and the consequences of human activities is
33 essential for management decision-making aimed to maintain, enhance, or restore the ecological
34 integrity of park ecosystems and to avoid, minimize, or mitigate ecological threats to these systems
35 (Roman and Barrett 1999).

36 The intent of the National Park Service (NPS) monitoring program is to track a subset of
37 park resources and processes, known as "Vital Signs," that are identified as the most significant
38 indicators of ecological condition for those specific resources and that are of the greatest concern
39 to each park. This subset of resources and processes is part of the total suite of natural resources
40 that park managers are directed to preserve "unimpaired for future generations," including water,
41 air, geological resources, plants and animals, and the various ecological, biological, and physical
42 processes that act on these resources. In situations where natural areas have been so highly
43 altered that physical and biological processes no longer operate under natural conditions (e.g.,
44 control of fires and floods in developed areas), information obtained through monitoring can help
45 managers understand how to develop the most effective approach to restoration or, in cases

1 where restoration is not feasible, to ecologically sound management. The broad-based,
2 scientifically sound information obtained through natural resource monitoring will have multiple
3 applications for management decision-making, research, education, and promoting public
4 understanding of park resources.

6 **1.1.2 Legislation, Policy, and Guidance**

7 National Park managers are directed by federal law and NPS policies and guidance to
8 know the status and trends in the condition of natural resources under their stewardship ~~in order~~
9 ~~to~~ fulfill the NPS mission of conserving parks unimpaired (see [Summary of Laws, Policies,](#)
10 [and Guidance,](#)
11 <http://science.nature.nps.gov/im/monitor/eupn/Laws-Policy.de.htm>). The
12 mission of the National Park Service is:
13

Field Code Changed

14
15 *"...to promote and regulate the use of the Federal areas known as national parks,*
16 *monuments, and reservations hereinafter specified by such means and measures as*
17 *conform to the fundamental purposes of the said parks, monuments, and reservations,*
18 *which purpose is to conserve the scenery and the natural and historic objects and the*
19 *wild life therein and to provide for the enjoyment of the same in such manner and by such*
20 *means as will leave them unimpaired for the enjoyment of future generations (National*
21 *Park Service Organic Act 1916)."*

22
23 As more natural and cultural resources were dedicated to National Park Service authority,
24 Congress recognized that all parks are interrelated to preserve a single national heritage, require
25 the same level of protection, and should operate under one set of guidelines. As a precursor to
26 the concept of park networks, Congress affirmed:

27
28 *"...that the national park system, which began with establishment of Yellowstone National*
29 *Park in 1872, has since grown to include superlative natural, historic, and recreation*
30 *areas in every major region of the United States...; that these areas, though distinct in*
31 *character, are united through their inter-related purposes and resources into one*
32 *national park system as cumulative expressions of a single national heritage; that,*
33 *individually and collectively, these areas derive increased national dignity and*
34 *recognition of their superb environmental quality through their inclusion jointly with*
35 *each other in one national park system preserved and managed for the benefit and*
36 *inspiration of all the people of the United States (General Authorities Act 1970)."*

37
38 Congress strengthened the NPS's protective function, and provided language important to
39 recent decisions about resource impairment, when it amended the Organic Act in 1978 to state
40 that *"the protection, management, and administration of these areas shall be conducted in light*
41 *of the high public value and integrity of the National Park System and shall not be exercised in*
42 *derogation of the values and purposes for which these various areas have been established..."*

43 Recognizing the need to understand the condition of natural resources within the park
44 system, a servicewide inventory and monitoring (I&M) program was established (NPS-75 1995;
45 <http://science.nature.nps.gov/im/monitor/nps75.pdf>). The I&M program was given the
46 responsibility to determine the nature and status of natural resources under NPS stewardship and
47 to monitor changes in the condition of these resources over time. Information from inventory

1 and monitoring efforts can then be incorporated into NPS planning, management, and decision
2 making.

3 The Government Performance and Results Act (GPRA; 1993) was established to insure
4 that daily actions and expenditures are guided by both long-term and short-term goals that are, in
5 turn, consistent with Department of Interior agency missions. For the Park Service, four
6 overarching goal ~~categories~~ guide the direction of more specific goals.

- 7
- 8 • Category I goals preserve and protect park resources.
- 9 • Category II goals provide for the public enjoyment and visitor experience of parks.
- 10 • Category III goals strengthen and preserve natural and cultural resources and enhance
11 recreational opportunities managed by partners.
- 12 • Category IV goals ensure organizational effectiveness.
- 13

14 Specific, long-term goals must be quantifiable. As such, measurable outcomes provide
15 the parks with tangible objectives and an effective means by which to measure progress toward
16 their goals and objectives (See http://www.doi.gov/gpra/nps_sp_6.pdf for specific NPS long-
17 term goals). A five-year strategic plan and an annual work plan outline the strategies for
18 reaching these goals while an annual performance report evaluates the annual progress made
19 toward GPRA goals.

20 More recently, the National Parks Omnibus Management Act of 1998 established the
21 framework for fully integrating natural resource monitoring and other science activities into the
22 management processes of the National Park System. The Act charges the Secretary of the
23 Interior to “continually improve the ability of the National Park Service to provide state-of-the-
24 art management, protection, and interpretation of and research on the resources of the National
25 Park System,” and to “...assure the full and proper utilization of the results of scientific studies
26 for park management decisions.” Section 5934 of the Act requires the Secretary of the Interior
27 to develop a program of “inventory and monitoring of National Park System resources to
28 establish baseline information and to provide information on the long-term trends in the
29 condition of National Park System resources.”

30 The Natural Resource Challenge (1999; <http://www.nature.nps.gov/challengedoc/>) action
31 plan refined the goals delineated in the NPS Strategic Plan designed to address GPRA goals.
32 The action plan presented the challenges confronting the Park Service and strategic approaches
33 for addressing these challenges over a five-year period. Extension of the Servicewide I&M
34 program, the formation of collaborative park networks, and active recruitment and inclusion of
35 scientists in complex park natural resource issues were among the strategies included in the
36 action plan.

37 Congress reinforced the message of the National Parks Omnibus Management Act of
38 1998 in its text of the FY 2000 Appropriations bill:

39
40 *The Committee applauds the Service for recognizing that the preservation of the diverse*
41 *natural elements and the great scenic beauty of America's national parks and other units*
42 *should be as high a priority in the Service as providing visitor services. A major part of*
43 *protecting those resources is knowing what they are, where they are, how they interact*
44 *with their environment and what condition they are in. This involves a serious*
45 *commitment from the leadership of the National Park Service to insist that the*
46 *superintendents carry out a systematic, consistent, professional inventory and monitoring*

1 *program, along with other scientific activities, that is regularly updated to ensure that the*
2 *Service makes sound resource decisions based on sound scientific data.*

3
4 The 2001 NPS Management Policies updated previous policy and specifically directed
5 the Service to inventory and monitor natural systems:

6
7 *Natural systems in the national park system, and the human influences upon them, will be*
8 *monitored to detect change. The Service will use the results of monitoring and research*
9 *to understand the detected change and to develop appropriate management actions.*

10
11 Further, "The Service will:

- 12
- 13 | ◆◆ *Identify, acquire, and interpret needed inventory, monitoring, and research, including*
14 *applicable traditional knowledge, to obtain information and data that will help park*
15 *managers accomplish park management objectives provided for in law and planning*
16 *documents.*
- 17 | ◆◆ *Define, assemble, and synthesize comprehensive baseline inventory data describing the*
18 *natural resources under its stewardship, and identify the processes that influence those*
19 *resources.*
- 20 | ◆◆ *Use qualitative and quantitative techniques to monitor key aspects of resources and*
21 *processes at regular intervals.*
- 22 | ◆◆ *Analyze the resulting information to detect or predict changes, including*
23 *interrelationships with visitor carrying capacities, that may require management*
24 *intervention, and to provide reference points for comparison with other environments and*
25 *time frames.*
- 26 | ◆◆ *Use the resulting information to maintain-and, where necessary, restore-the integrity of*
27 *natural systems (2001 NPS Management Policies)."*

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28
29 Additional statutes provide legal direction for expending funds to determine the condition
30 of natural resources in parks and specifically guide the natural resource management of network
31 parks, including:

- 32
- 33 | ◆◆ Taylor Grazing Act 1934;
- 34 | ◆◆ Fish and Wildlife Act 1956;
- 35 | ◆◆ Fish and Wildlife Coordination Acts 1958 and 1980;
- 36 | ◆◆ Clean Air Act 1963, amended 1970 and 1990;
- 37 | ◆◆ Wilderness Act 1964;
- 38 | ◆◆ National Historic Preservation Act 1966;
- 39 | ◆◆ National Environmental Policy Act of 1969;
- 40 | ◆◆ Coastal Zone Management Act 1972;
- 41 | ◆◆ Clean Water Act 1972, amended 1977 and 1987;
- 42 | ◆◆ Marine Protection, Research and Sanctuaries Act 1972;
- 43 | ◆◆ Marine Mammal Protection Act of 1972, amended 1973, 1976-1978, 1980-1982, 1984,
44 1986, 1988, 1990, 1992-1994, and 1996;
- 45 | ◆◆ Endangered Species Act 1973, amended 1982;

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- ◆◆ Migratory Bird Treaty Act 1974;
- ◆◆ Forest and Rangeland Renewable Resources Planning Acts of 1974 and 1976;
- ◆◆ Mining in the Parks Act 1976;
- ◆◆ Magnuson-Stevens Fishery Conservation and Management Act 1976, as amended 1978-1980, 1982-1984, 1986-1990, 1992-1994, and 1996;
- ◆◆ Executive Order 11990 (Protection of Wetlands) 1977;
- ◆◆ American Indian Religious Freedom Act 1978;
- ◆◆ Archaeological Resources Protection Act 1979;
- ◆◆ Federal Cave Resources Protection Act 1988.

1.2 Monitoring Goals and Strategies

1.2.1 Role of Inventory, Monitoring, and Research in Resource Management

Monitoring is a central component of natural resource stewardship in the NPS, and in conjunction with natural resource inventories and research, provides the information needed for effective, science-based managerial decision-making and resource protection (Figure 1.1; see also [Definitions of Natural Resource Inventories, Monitoring, and Research](#), http://www1.nrintra.nps.gov/im/monitor/cupn/IM_Definitions.doc). The NPS strategy to institutionalize inventory and monitoring throughout the agency consists of a framework (see [Framework for National Park Service Inventory and Monitoring](#), http://www1.nrintra.nps.gov/im/monitor/cupn/IM_Framework.doc) having three major components: (1) completion of 12 basic resource inventories upon which monitoring efforts can be based; (2) a network of 11 experimental or “prototype” long-term ecological monitoring (LTEM) programs begun in 1992 to evaluate alternative monitoring designs and strategies; and (3) implementation of operational monitoring of critical parameters (i.e., Vital Signs) in approximately 270 national parks with significant natural resources that have been grouped into 32 networks linked by geography and shared natural resource characteristics. (See the report [Glossary](#) for a list of monitoring terms and their definitions.)

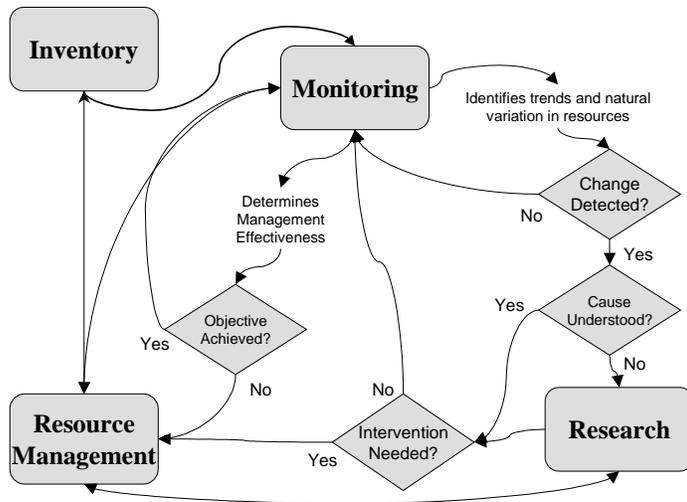


Figure 1.1. Relationships between monitoring, inventories, research, and natural resource management activities in national parks (modified from Jenkins et al. 2002).

All parks with significant natural resources must possess at least a minimal complement of 12 resource inventory data sets to be able to effectively manage resources. The I&M program requires these parks to compile at least:

- A natural resource bibliography,
- Base cartographic data,
- A geology map,
- Soils map,
- Weather data,
- Air quality data,
- Location of air quality monitoring stations,
- Water body locations and classifications,
- Water quality data,
- Vegetation maps,
- A documented species list of vertebrates and vascular plants, and
- Species distributions for and status of vertebrates and vascular plants.

The network approach will facilitate collaboration, information sharing, and economies of scale in natural resource monitoring, and will provide parks with a minimum infrastructure for initiating natural resource monitoring that can be built upon in the future. Ten of the 32 networks include one or two prototype long-term ecological monitoring programs, which were established as experiments to learn how to design scientifically credible and cost-effective monitoring programs in ecological settings of major importance to a number of NPS units. Because of higher funding and staffing levels, as well as U.S. Geological Survey (USGS)

1 involvement and funding in program design and protocol development, the prototypes serve as
2 “centers of excellence” that are able to do more extensive and in-depth monitoring and continue
3 research and development work to benefit other parks (see
4 http://www1.nrintra.nps.gov/im/monitor/cupn/IM_Definitions.doc).

6 | **1.2.2 Goals for Vital Signs Monitoring**

7
8 The servicewide goals for Vital Signs monitoring for the National Park Service are as
9 follows:

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

21 | **•1.2.3 Strategic Approaches to Monitoring**

23 | **•1.2.3.1 Scope and Process for Developing an Integrated Monitoring Program**

25 During the development of the vision for park Vital Signs monitoring, it was clear that a
26 “one size fits all” approach to monitoring design would not be effective in the NPS considering
27 the tremendous variability in ecological conditions, sizes, and management capabilities among
28 parks. Parks need considerable flexibility to develop an effective and cost-efficient monitoring
29 program that addresses the most critical information needs of each park and that can be
30 integrated with other park operations such as interpretation and maintenance activities.
31 Additionally, this process needs to allow existing programs that have been carefully scrutinized,
32 existing funding sources, and current staff to be combined with new funding and staffing
33 available through the Natural Resource Challenge and the various divisions of the Natural
34 Resource Program Center. Partnerships with federal and state agencies and adjacent landowners
35 are necessary to effectively understand and manage resources and threats that extend beyond
36 park boundaries, but these partnerships (and the appropriate ecological indicators and
37 methodologies involved) differ for parks throughout the national park system. For example,
38 parks in the Pacific Northwest need to select certain indicators and methodologies that are
39 consistent with their National Forest Service neighbors and the Northwest Forest Plan, whereas
40 parks in South Florida, in conjunction with the U.S. Army Corps of Engineers, South Florida
41 Water Management District, and other partners, may select a completely different set of
42 indicators and sampling protocols appropriate to restoration of the Everglades ecosystem.

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1 The complicated task of developing a network monitoring program requires an initial
2 investment in planning and design to guarantee that monitoring meets the most critical
3 information needs of each park. The program must produce scientifically credible results that
4 are clearly understood and accepted by scientists, policy makers, and the public, and that are
5 readily accessible to managers and researchers. These front-end investments also ensure that
6 monitoring will build upon existing information and understanding of park ecosystems and make
7 maximum use of leveraging and partnerships with other agencies, organizations, and academia.

8 Each network of parks is required to design an integrated monitoring program that
9 addresses the monitoring goals listed above and is tailored to the high-priority monitoring needs
10 and partnership opportunities for the parks in that network. Although there will be considerable
11 variability among networks in the final design, the basic approach to designing a monitoring
12 program should follow five basic steps, which are further discussed in the [Recommended](#)
13 [Approach for Developing a Network Monitoring Program](#)
14 (<http://science.nature.nps.gov/im/monitor/index.htm>):
15

- 16 1. Define the purpose and scope of the monitoring program.
- 17 2. Compile and summarize existing data and understanding of park ecosystems.
- 18 3. Develop conceptual models of relevant ecosystem components.
- 19 4. Select indicators and specific monitoring objectives for each; and
- 20 5. Determine the appropriate sampling design and sampling protocols.

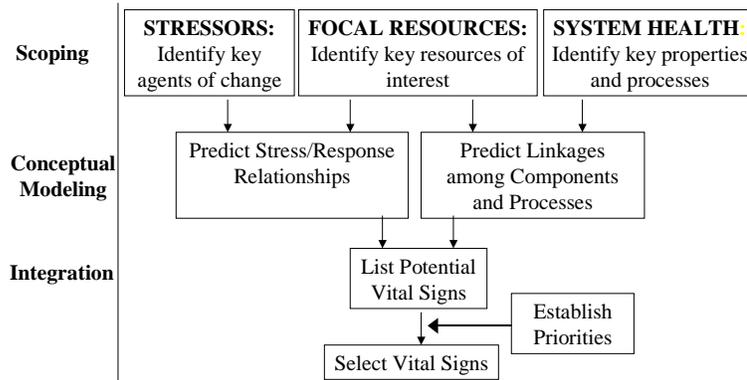
21 These steps are incorporated into a 3-phase, 5-year planning and design process that has
22 been established for the monitoring program. Phase 1 of the process involves 1) defining goals
23 and objectives; 2) identifying, evaluating and synthesizing existing data; 3) identifying
24 preliminary monitoring questions; 4) developing draft conceptual models; and 5) completing
25 other background work that must be done before the initial selection of ecological indicators
26 (Figure 1.2). Each network is required to document these tasks in a Phase 1 report, which is then
27 peer-reviewed and approved at the regional level before the network proceeds to the next phase.
28 The Phase 1 report is a first draft of Chapters 1 and 2 of the final monitoring plan that present the
29 Introduction/Background and Conceptual Models.
30

31 Phase 2 of the planning and design effort involves selecting and prioritizing Vital Signs
32 and developing specific monitoring objectives for the parks in each network that will be included
33 in the network's initial integrated monitoring program (Figure 1.2).

34 Phase 3 entails the detailed design work needed to implement monitoring, including the
35 development of sampling protocols, a statistical sampling design, a plan for data management
36 and analysis, and details on the type, content, and timeline of various products of the monitoring
37 effort such as reports and websites.

38 The NPS Water Resources Division provides explicit guidance and funding for the water
39 quality monitoring component of a network's monitoring program. Consequently, the NPS
40 Water Resources Division requires networks to fully integrate the design and implementation of
41 water quality monitoring with the network-based Vital Signs monitoring program. Networks
42 have the option of producing a single, integrated monitoring plan that incorporates the "core
43 Vital Signs" and water quality monitoring components using the 3-phase approach outlined
44 above, or they can produce a separate document for the water quality monitoring component that
45 follows the detailed guidance for water quality monitoring developed by the Water Resources

1 Division (see <http://www.nature.nps.gov/im/monitor/handbook.htm>). The San Francisco Bay
 2 Area Network chose the former approach.
 3



4
 5 Figure 1.2. Basic approach to identifying and selecting Vital Signs for integrated monitoring of
 6 park resources (source: K. Jenkins, USGS Olympic Field Station).
 7

8 1.2.3.2 Strategies for Determining What to Monitor

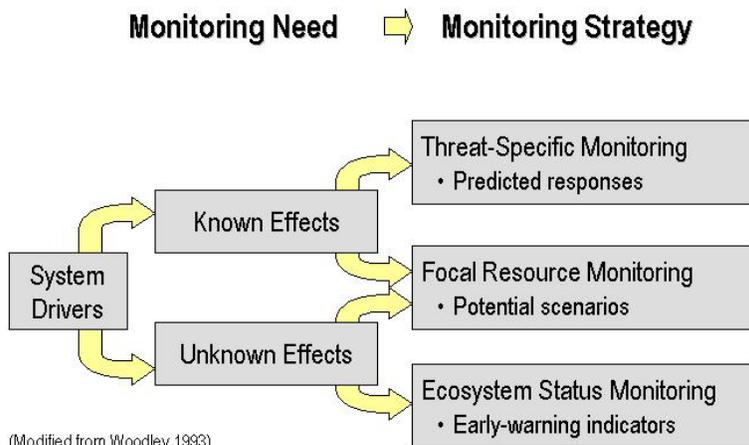
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 10 Monitoring is an on-going effort to better understand how to sustain or restore
 11 ecosystems, and serves as an "early warning system" to detect declines in ecosystem integrity
 12 and species viability before irreversible loss has occurred. As our understanding of ecological
 13 systems and the concepts of sustainability and integrity of natural systems has evolved, the
 14 classic view of the "balance of nature" has been replaced by a non-equilibrium paradigm which
 15 recognizes that ecological systems are regularly subject to natural disturbances such as droughts,
 16 floods, and fire that alter the composition and structure of the systems and the processes that
 17 shape them. Even in the absence of human activities, ecosystems are characterized by high
 18 variability in composition, structure and function. The goals of the Vital Signs monitoring
 19 program recognize the dynamic nature and condition of park ecosystems and the need to identify and
 20 separate "natural" variation from undesirable anthropogenic sources of change to park resources.

21 One of the key initial decisions in designing a monitoring program is deciding how much
 22 relative weight should be given to tracking changes in focal resources and stressors that address
 23 current management issues versus measures that are thought to be important to the long-term
 24 understanding of park ecosystems. An ecological indicator is most useful when it can provide
 25 information to support a management decision or to quantify the success of past decisions. The
 26 indicator must produce data that can be interpreted, clearly understood, and accepted by
 27 managers, scientists, policy makers, and the public. However, current understanding of
 28 ecological systems is constrained, and consequently, predictions of how park resources might
 29 respond to changes in various system drivers and stressors is limited. A monitoring program that
 30 focuses only on current threat/response relationships and current issues may not provide the
 31 long-term data and understanding needed to address high-priority issues that will arise in the
 32 future.

1 Should Vital Signs monitoring focus on the effects of known threats to park resources or on
 2 general properties of ecosystem status? Woodley (1993), Woodward et al. (1999), Jenkins et al.
 3 (2002) and others have described some of the advantages and disadvantages of various monitoring
 4 approaches, including a strictly threats-based monitoring program, or alternate taxonomic,
 5 integrative, reductionist, or hypothesis-testing monitoring. Ultimately, the best way to meet the
 6 challenges of monitoring in national parks and other protected areas is to achieve a balance among
 7 different monitoring approaches, while recognizing that the program will not succeed without also
 8 considering political issues. NPS, therefore, has adopted a multi-faceted approach for monitoring
 9 park resources, based on both integrated and threat-specific monitoring approaches and that builds
 10 upon concepts presented originally for the Canadian national parks (Figure 1.3; Woodley 1993).
 11 Specifically, it is recommended that indicators be chosen from each of the following broad
 12 categories:

- 14 | (1) **ecosystem drivers and processes** that fundamentally affect park ecosystems,
- 15 (2) **stressors and their ecological effects**,
- 16 (3) **focal resources** of parks, and
- 17 (4) **key properties and processes of ecosystem integrity**.

18
 19 Collectively, these basic strategies for choosing monitoring indicators achieve the diverse
 20 monitoring goals of the National Park Service. See the report [Glossary](#) for a list of monitoring
 21 terms and their definitions.
 22



23
 24
 25 Figure 1.3. Conceptual approach for selecting monitoring indicators. In certain cases where good
 26 understanding exists between potential effects and responses by park resources (Known Effects),
 27 monitoring of system drivers, stressors, and effected park resources is conducted. A set of focal
 28 resources (including ecological processes) will be monitored to address both known and unknown
 29 effects of system drivers and stressors on park resources. Key properties and processes of ecosystem
 30 status and integrity will be monitored to improve long-term understanding and potential early
 31 warning of undesirable changes in park resources.
 32

1
2 1.2.3.3 Integration: Ecological, Spatial, Temporal, and Programmatic
3

4 One of the most difficult aspects of designing a comprehensive monitoring program is
5 integration of monitoring projects so that the interpretation of the whole monitoring program yields
6 information more useful than that of individual parts. Integration involves ecological, spatial,
7 temporal, and programmatic aspects. An ideal ecosystem monitoring strategy will employ a suite of
8 individual measurements that collectively monitor the integrity of the entire ecosystem. One
9 approach for effective ecological integration is to select indicators at various hierarchical levels of
10 ecological organization (e.g., landscape, community, population, genetic; see Noss 1990). Similarly,
11 spatial integration requires understanding of scalar ecological processes, coordinated location of
12 comparably scaled monitoring indicators, and design of statistical sampling frameworks that permit
13 the extrapolation and interpolation of scalar data. Temporal integration requires the development of
14 a meaningful timeline for sampling different indicators while considering characteristics of temporal
15 variation in these indicators. For example, sampling changes in the structure of a forest size class
16 distribution may require much less frequent sampling than that required to detect changes in the
17 composition or density of herbaceous groundcover. Programmatic integration requires coordinated
18 monitoring planning and design by the Natural Resources Program Center (NRPC) divisions of Air
19 Resources, Biological Resource Management, Geologic Resources, Natural Resource Information,
20 and Water Resources to provide guidance, technical support and funding to the networks.
21 Monitoring planning also needs to be coordinated and results communicated within and among parks
22 and with other agencies and institutions. Coordinated monitoring planning, design, and
23 implementation efforts encourage cooperative resource use, promote sharing of data among
24 neighboring land management agencies, provide context for interpreting data, and encourage
25 additional research. (See the report [Glossary](#) for a list of monitoring terms and their definitions.)
26

27 1.2.3.4 Limitations of the Monitoring Program
28

29 All monitoring programs have limitations that are a result of the inherent complexity and
30 variability of park ecosystems, coupled with limited time, funding, and staffing available for
31 monitoring. Ecosystems are loosely-defined assemblages that exhibit characteristic patterns on a
32 range of scales of time, space, and organization complexity (De Leo and Levin 1997). Natural
33 systems as well as human activities change over time, and it is extremely challenging to
34 distinguish natural variability and desirable changes from undesirable anthropogenic sources of
35 change to park resources. The monitoring program simply cannot address all resource
36 management interests because of limitations of funding, staffing, and logistical constraints. Rather,
37 the intent of Vital Signs monitoring is to monitor a select sub-set of ecosystem components and
38 processes that reflect the condition of the park ecosystem and are relevant to management issues.
39 Cause and effect relationships usually cannot be demonstrated with monitoring data, but
40 monitoring data might suggest a cause and effect relationship that can then be investigated with a
41 research study. As monitoring proceeds, as data sets are interpreted, as our understanding of
42 ecological processes is enhanced, and as trends are detected, future issues will emerge (Roman
43 and Barrett 1999). The monitoring plan, therefore, should be viewed as a working document,
44 subject to periodic review and adjustments over time as our understanding improves and new
45 issues and technological advances arise.
46