

## ***From: November 2005 Internal Scoping Report***

Annotations in italics to bring final resolution of objectives for the Draft Dog Management Plan/EIS.

July 23, 2007

### ***Objectives in Taking Action***

Objectives are specific goals that describe what GGNRA intends to accomplish by preparing a dog management plan. These objectives come from a variety of sources, including existing GGNRA policy documents, NPS management policies, laws and regulations, laws and policies that dictate resource management (such as the Endangered Species Act or National Historic Preservation Act), and the dog management issues discussed above. Alternatives that will be developed as part of the NEPA process will often differ in the extent to which each of the objectives is met. The internal scoping process yielded the following specific objectives for this planning process:

- **Adopt a dog management plan.** The current situation has been created by a regulation that is greatly at odds with the wishes of many members of the public, by frequent violations of that regulation in locations where resources may be adversely affected, and by the lack of sufficient enforcement personnel. These difficulties, combined with the reasons identified above (see *Current Dog Management Problems*), have led the park to commit to establishing a clear and enforceable set of policies in the form of a dog management plan, which may support the basis for a special dog walking regulation for GGNRA. *This is part of purpose and need for the plan and will be explained as an objective fully met in the EIS.*
- **Build community support for the plan.** The use of the Negotiated Rulemaking Committee, with broad representation of all known positions on dog management, would help in building community support for this part of the planning process. Committee meetings are by law open to the public, and both the negotiated rulemaking and NEPA processes provide for public input and review requirements that would serve to inform and involve interested parties and groups. *This objective was not stated in the Public Scoping Brochure, nor in subsequent presentations of the objectives. Suggest the objective be dropped from the EIS, but explained in the Background section of Chapter 1, under the history of dog walking, reg neg, NEPA, etc.*
- **Maximize dog walker compliance .** To date the park has been unable to provide the needed law enforcement personnel to enforce the NPS-wide regulation regarding dog walking. Alternatives are likely to need educational components and may require the dog walking community to be self-policing and assist the park in its efforts to protect the safety of visitors, the quality of visitor experience, and the natural and cultural resources of the park. *This objective was reworded for the Public Scoping Brochure and in subsequent presentations, and should remain as stated in the Brochure.*

- **Provide adaptability and flexibility.** Resource conditions and visitor use are likely to change over time. For example, the need to provide mountain biking opportunities was not something the park had anticipated until this sport came into existence in the late 1980s. The plan must be dynamic and allow for monitoring to be able to open and close areas to dog walking as needed in order to accommodate the recreational needs of GGNRA visitors and protect park resources and values. *This objective should remain as written in the Public Scoping Brochure and in subsequent presentations and is consistent with the Internal Scoping Report.*
- **Increase public understanding of NPS policies.** The National Park Service is unable to allow certain uses of its lands or impacts on its resources and values because of the laws and policies under which it must operate. Some of these are explained in the *Laws, Regulations and Policies* section below. In general, the NPS is required to keep its resources from becoming degraded to the point that future generations are unable to enjoy them. The NPS also has many specific requirements for resource protection, safety, and other factors in its 2001 Management Policies (NPS 2001a) and its many Director’s Orders (see [www.nps.gov/policy](http://www.nps.gov/policy) for additional information). Education on national park policies is important so that the public can understand the legal and regulatory constraints that differentiate NPS land management from that of other land management agencies, and that bind the actions the park can legally take in managing dog walking. *This objective is covered under “Be clear, easy to understand, and include educational components; and Be enforceable;” The DEIS will explain that the educational components would include education on NPS policies and the regulation that is being enforced.*
- **Create and implement an enforceable commercial dog walking policy.** Commercial enterprise of any kind is not allowed in national parks without concessionaire contracts, fees, and/or permission from the park. The plan should be responsive to NPS policies regarding commercial uses in parks, as well as to the growing demand for businesses using the park to provide recreation for their “clients,” in this case, dogs. *This objective doesn’t appear in the Public Scoping Brochure or subsequent presentations and should remain in the DEIS. Alternatives will cover everything from no regulated commercial dog walking (Existing Current Conditions) to a range of options for CUA’s.*
- **Provide for a variety of safe, high quality, visitor use experiences, including areas where dogs are allowed.** In addition to its policies to protect resources, the NPS is also mandated to provide for the enjoyment of park resources and values, and the GGNRA has noted in its Strategic Plan (NPS 1997) that one of its main missions is to “bring parks to the people.” Although visitor enjoyment is one of the fundamental missions of the NPS, conservation of park resources and values takes precedence if there is a conflict between the park’s conservation and the public’s right of enjoyment (NPS 2001a 1.4.3). GGNRA seeks through this plan to provide both places where dog owners are able to walk their dogs in a variety of settings and places where visitors would either never encounter dogs or would be very unlikely to do so. The park seeks to make all visitor experiences as safe and as high quality as possible. *This objective is consistent with the Public Scoping Brochure and subsequent presentations and would be covered in the DEIS.*

- **Establish criteria consistent with NPS Management Policies (NPS 2001a) to determine whether and/or where dogs restrained by voice control or leashes are acceptable and where no dogs are appropriate.** It is anticipated that each alternative would consider off-leash dog walking areas, although some alternatives may find that no areas are appropriate for this use. Some alternatives may suggest time/day/seasonal restrictions, fences, or other mitigation measures to control off-leash dogs to minimize visitor use conflict and impact on park resources. Each alternative may also include the formal closure of areas previously closed annually via the compendium and the Code of Federal Regulations. As noted above, these closures take place to protect visitor safety or park resources. Although most closures have been to both dogs and humans, the alternatives may include areas off-limits only to dogs to ensure some “dog free” visitor experiences or to protect sensitive resources. **These areas may be off-limits for certain times of the day, days of the week, seasons of the year, or completely closed to dogs.** Alternatives may also designate areas of the park when on-leash dog use is appropriate. Because the park acquires property via donation and congressional action, establishing firm criteria for the appropriateness of dog-related activities would also help guide future management decisions. *Note—bold is my annotation. This objective was not stated in the Public Scoping Brochure, but was disclosed to the technical subcommittee in several presentations. It should be discussed in Chapter 2 of the EIS under “Process for Alternatives Development.”*
- **Control and direct dog use with clear and enforceable parameters.** Guidance to dog walkers and to park enforcement personnel must be easy to understand and enforceable. The alternatives would include a component specifying how violations of the rules in the plan would be treated, whether and how the public’s help would be solicited in enforcing rules, and how safety would be addressed for park personnel or volunteers policing areas or cleaning up dog waste. *This is covered under: “Be clear, easy to understand, and include educational components; and Be enforceable” in the Public Scoping Brochure and in subsequent presentations and would be included in the DEIS.*
- **Protect sensitive species and their habitat—including federal and state-listed, unique, or rare species—from the detrimental effects associated with dog use.** The alternatives would identify areas, if any, where dog use would not be allowed or would be highly restricted if it would prevent GGNRA from meeting state or federal recovery goals for sensitive and unique plant and animal species. In addition to the mandates to conserve resources and prevent their impairment, the NPS must follow the requirements of the Endangered Species Act. NPS Management Policies (NPS 2001a, sec 4.4.2.3) offer the same protection to state-listed, unique, or rare species inside park boundaries to the extent it is possible. *This is covered under: “Protect native species and habitat, including any threatened, endangered, unique, or rare species from impacts associated with dogwalking” in the Public Scoping Brochure and subsequent presentations.*
- **Protect native wildlife and their habitat from detrimental effects of dogs use, with no net change in the abundance of native wildlife species, amount of acreage, or function of habitat.** Alternatives in the EIS would include monitoring to ensure that wildlife or habitat in areas open to on-leash or off-leash dog walking suffer no detrimental effects, or if impacts do occur, that they are alleviated. Although mitigation of damage may be necessary, no net loss of wildlife or of habitat quality overall would be allowed. *This objective was not stated in the Public Scoping Brochure or in*

*subsequent presentations. The park needs to make a decision on the “no net loss” statement because it would potentially affect alternatives for Ft. Funston. We could explain in the “Protect native species and habitat” objective that it means no net loss, consistent with our management policies. I need to check on “no net loss” in the 2006 Management Policies. Needs further discussion.*

- **Preserve opportunities for future natural and cultural resource restoration and enhancement.** The presence of dogs would not be allowed to degrade an area to the extent that park resources in that area could not be restored or enhanced. GGNRA periodically prepares cultural and natural resource management plans that list and prioritize resource management, protection, restoration, and enhancement needed. Alternatives would be checked against the projects identified in each of these plans to ensure restoration opportunities are not inadvertently lost or threatened by dog management. *This objective was not stated in the Public Scoping Brochure or in subsequent presentations, although we have had discussions in the technical subcommittee about NPS management policies about NPS management policies ( by Goodyear, Hamilton and Bransom) about restoration and enhancement. Needs further discussion.*
- **Minimize harassment or disturbance of wildlife by dogs.** As noted above, it has been documented in a number of sources that dogs disturb wildlife under certain conditions. In particular, they chase shorebirds and can even run down and injure or kill a slowly moving bird. Dogs may also trample or disturb ground nesting birds, and the very presence of dogs can cause even cliff-nesting birds to take flight (see *Annotated Bibliography*, Appendix A). Dogs are also known to chase terrestrial wildlife, including deer and coyotes, and have been known to harass stranded marine mammals. The energy expended in escape can make animals more susceptible to loss from predation or weather and can affect reproductive success. Alternatives in this EIS may use seasonal restrictions, imposition of on-leash rules, closures or other mitigation to minimize harassment or disturbance of wildlife by dogs. The park may also use targeted studies that could detect impact of dogs on/off leash vs. people, etc. to evaluate levels of disturbance to wildlife. *This is covered under: “Protect native species and habitat, including any threatened, endangered, unique, or rare species from impacts associated with dogwalking” in the Public Scoping Brochure and subsequent presentations.*
- **Facilitate research to better understand and manage the effects of dog use on park resources.** Some alternatives may include provisions for seeking additional funding, especially for research that answers questions regarding impacts of dogs on park environments or helps guide future GGNRA dog management decisions. *This is covered under: Be adaptable to changing needs and research and monitoring results” in the Public Scoping Brochure and subsequent presentations.*
- **Minimize degradation of soil and water resources by dog use.** Dog excrement and urine can change the chemical nature of water resources, and soil erosion from digging or excessive use can contribute to soil loss and excess turbidity. Alternatives would include measures to ensure that unique soil resources, as well as the park’s streams, rivers, ponds, wetlands, and coastal resources are not adversely impacted. Mitigation measures and/or partial closures or restrictions (during the rainy season, for example) may be employed to provide this protection. *This is covered under: “Minimize*

*degradation of soil and water resources from dogwalking” in the Public Scoping Brochure and subsequent presentations.*

- **Share what the park learns with other parks and neighboring jurisdictions dealing with the same issues.** Many cities, counties, municipal districts, and other agencies across the country are being asked by their citizens to create opportunities for off-leash, voice-control dog walking. Each municipality is considering many of the same issues as those listed here, and some have begun programs allowing dogs off leash in portions of their managed lands. GGNRA would depend on monitoring information collected by a variety of agencies to help create alternative plans within the EIS process and also hopes to share what it learns with other parks and agencies. *This is somewhat implied in: “Be clear, easy to understand, and include educational components” but not stated as directly as in the Internal Scoping Report. If alternatives are to include aspects of monitoring and sharing information with other jurisdictions in some formalized way, it should remain as an EIS objective. Perhaps give consideration to this in development of options for the “Recreational Advisory Committee.”*
- **Monitor and use the information collected to evaluate current and future decision-making based on estimated outcomes.** Each alternative plan would have a monitoring component that would collect information on resource conditions, visitor safety, visitor experience, and other factors. GGNRA may construct an “adaptive management” alternative or include adaptive management within each alternative considered. This means specific resource conditions, visitor safety, and other desired outcomes would be defined and adjusted based upon monitoring. *This is covered under “Be adaptable to changing needs and research and monitoring results” in the Public Scoping Brochure and in subsequent presentations.*
- **Prevent further adverse effects to cultural landscapes, historic structures, and archeological sites from dog activities.** Dogs can affect cultural resources through digging, erosion of soils, by exposing archeological resources to erosion, or by causing the loss of culturally important landscaping. The presence of dogs may require a landscape to be fenced that had not historically been fenced. Alternatives will consider known and potential significant historic, archeological, and cultural landscape sites in determining where various dog-related activities are appropriate and will protect opportunities for future restoration of those sites. *Need resolution from cultural resource manager and staff at park as to whether the EIS will address this objective and impacts to cultural resources.*
- **Ensure safe and healthy working environment for park staff.** This objective is aimed at ensuring that staff, volunteers, and park partners who enforce dog-walking policies, rescue dogs and their owners, and remove dog waste enjoy a safe and healthful work environment. Enforcement, maintenance, interpretive, and natural resource personnel, along with park volunteers and park partner personnel are currently exposed to dog bites, verbal and even physical attacks from belligerent dog owners, and danger from rescues. Maintenance workers risk additional health hazards from waste cleanup. Alternatives would consider measures both to maintain the safety of these workers and/or to ensure punishment of dog owners who violate rules and regulations. *This is*

*covered under: “Ensure a safe and healthy working environment for park staff” in the Public Scoping Brochure and subsequent presentations.*

- **Minimize the need for enforcement:** Currently, resource management and law enforcement staff spends scarce time and resources managing dog walking at GGNRA. The Dog Management Plan would include education and the integration of public comments such that park management and enforcement would be more limited and staff resources could be allocated to other high priority resource management tasks. *This is implied under: “Be enforceable” in the Public Scoping Brochure and subsequent presentations, but not stated as directly. The costs of each alternative to operations, including law enforcement and its priorities, would be analyzed in the DEIS.*
- **Develop a Plan to Address New Park Areas:** As new areas are added to the GGNRA, the park must develop a management plan for these areas. In evaluating suitable uses, the issue of dog walking must often be addressed. The Dog Management Plan will spell out how to evaluate this use on new lands. *Suggest this objective remain in the DEIS so we don’t forget to add a component to each alternative, or “Common to All Action Alternatives” criteria for new areas. It has been stated at technical subcommittee meetings that “the criteria” would be used to evaluate new areas for dog walking opportunities, but we haven’t tested the criteria against potential new areas. Nancy Hornor/Planning should be involved in reviewing the criteria and helping “test” them for potential application to new areas.*



## Why a Special Regulation for Dog Walking?

**Correct the current status.** A special regulation is needed to change the current dog walking status through proper procedure, per the 2005 Federal Court decision.

**Appropriate management.** Currently, actions that would cause significant changes to dog walking use, or change the 1979 Pet Policy, **cannot proceed without rulemaking.**

**Protection of resources.** GOGA has 3rd highest number of T and E species in the NPS – many **at risk from unmanaged dog-walking.**

### **Improve Visitor Experience.**

**Displacement.** Dog walking has **displaced other users** – e.g. equestrians, elderly visitors, bird watchers and those fearful of dogs - in some of the most popular areas of the park.

**Degraded Visitor Experience.** Frequent **complaints from families, seniors and others** about negative experiences due to interference by off-leash dogs, fear of dogs and harassment by dog walkers.

**Increase Employee Safety.** There has been an **increase in dog bites and aggression** experienced by NPS field staff.

**Reduce Management Burden.** Dog walking-related issues account for **11% of annual law enforcement incident reports** (which does not include any number of unreported incidents).

# Overview

## Initial Draft EIS for Dog Management

### Purpose

Determine the **manner and extent** of dog walking in the park.

### Objectives

**Visitor Experience – Minimize conflicts** by providing a variety of safe, high-quality visitor use experiences, including dog walking.

**Compliance – Maximize compliance** with clear, enforceable dog walking parameters.

### Park Operations

- Provide management adaptability - **monitoring** data as basis for future decision.
- Ensure a **safe and healthy** working environment for staff.
- Evaluate **commercial dog walking** - create enforceable policy if allowed

### Natural Resources

- Protect wildlife and habitat (including sensitive species and habitat, federally or state listed, unique, or rare species)
- Minimize degradation of vegetation, soil and water resources
- Preserve opportunities for future natural resource restoration

### Cultural Resources

- Preserve opportunities for cultural resource restoration
- Protect cultural resources

### Education

- Build community support for the plan
- Increase public understanding of NPS policies.

## Key Elements of the Initial Draft EIS

- Specified **where and under what conditions** dog walking can occur, and where it should not occur, based on resource impacts and visitor use concerns.
- Addressed **21** park sites, **new lands** and commercial dog walking.
- Elements common to all alternatives:
  - Dog walking allowed **only**:
    - in **areas designated for on-leash**
    - in **Regulated Off Leash Areas (ROLAs)**
  - Limit of 3 dogs per person (private or commercial), unless permits allowed.
    - Permit allows maximum of 6; issued for only 7 park sites
  - **Compliance-based Management** – a form of adaptive management – **monitors compliance**.
    - If compliance unacceptable (75%), two phases of management response.
      - 1<sup>st</sup> phase includes focused enforcement and education,
      - 2<sup>nd</sup> phase would **trigger change to next most restrictive** management if compliance unacceptable after a year of initial management response.

## Overview of Alternatives

### No Action (Alternative A)

### 4 Action Alternatives

- Alt B – Applies NPS leash regulation in all areas
- Alt C – Balances dog walking with other uses in each county –provides a range of uses in each
- Alt D – Provides most protection of resources and visitor safety – greatest restriction of dog walking
- Alt E – Provides the most dog walking access while still providing protection to resources and visitors. Most management intensive.

### Preferred Alternative

Site by site treatment selected from range of action alternatives. **Overall emphasis on Alternative C**

# GOLDEN GATE NATIONAL RECREATION AREA



RED TEXT INDICATES GOLDEN GATE NATIONAL RECREATION AREA SITES INCLUDED IN **DOG MANAGEMENT PLAN/EIS**



**REGULATED OFF-LEASH AREAS (ROLAs)**



**GOLDEN GATE NATIONAL RECREATION AREA MANAGED LANDS**



Golden Gate National Recreation Area Legislative Boundary



Golden Gate National Recreation Area Offshore Areas



April 2013

GGNRA006044

## How Alternatives Were Developed

*According to principles of management – no pre-determined extent of use.*

**Consider each site’s resources and visitor use**, then address the purpose, need, objectives of plan/EIS.

### **Goal – clear and enforceable policy**

- Consistency with adjacent jurisdictions
- Ease of visitor understanding and compliance
- Ease of enforcement

### **Goal – preserve and protect natural/cultural resources and natural processes**

- Site away from areas with sensitive or listed species
- No adverse impacts to T & E species
- Limit to perimeters of large areas of contiguous habitat
- No off-leash dog walking on trails
- Site adjacent to developed areas, especially within already manipulated landscapes

### **Goal – Improve visitor and employee safety and reduce user conflicts**

- No off-leash dog walking on trails
- Minimize impacts to other existing visitor uses
- Separate user groups by space, or minimal barriers if necessary

### **Goal – Provide a variety of visitor experiences**

- Consider options for dog walking access in each site, including no-dog areas
- Time of use
- ADA compliant

## Draft EIS Public Comment

2400-page draft Plan/DEIS released in 2011 for a 4.5 month public comment period.  
8000 substantive comments received.

### Substantive Input Requiring Supplemental EIS

- ***“Include 1979 Pet Policy (status quo) in range of alternatives.*** It is effective, or would be with better enforcement.”
- ***“Need site specific analysis for new park site,*** Rancho Corral de Tierra.”
- ***“Rejection of some data and studies cited to document dog-walking impacts. More data, other studies, needed to justify action.”***
- ***“Need more analysis of potential for redistribution*** of dog walkers onto adjacent lands.”
- ***“ADA-related*** access and safety ***concerns insufficiently addressed.”***
- ***“Automatic changes of areas to a more restrictive status through Compliance-based Management challenged as arbitrary.”***
- ***“Expand monitoring*** - include natural and cultural resources.”
- ***“Excessively restricting dog walking will increase impacts*** on visitors and resources.”
- ***“Add fencing and time-of-use*** as possible future management actions to protect resources.”

# GOLDEN GATE NATIONAL RECREATION AREA



RED TEXT INDICATES  
GOLDEN GATE NATIONAL RECREATION AREA  
SITES INCLUDED IN **DOG MANAGEMENT PLAN/EIS**



**REGULATED OFF-LEASH AREAS (ROLAs)**



**GOLDEN GATE NATIONAL RECREATION AREA  
MANAGED LANDS**



Golden Gate National Recreation Area  
Legislative Boundary



Golden Gate National Recreation Area  
Offshore Areas



April 2013

GGNRA006047

**GOLDEN GATE NATIONAL RECREATION AREA - DOG MANAGEMENT TIMELINE**

**1972 -2013**

**1972** – GOGA established. Inherits long history of off-leash dog walking.

**1978** – Public pressure on park and GOGA Advisory Commission (CAC) to allow off-leash dog walking.

**1979** – CAC recommends Pet Policy to the park that would establish 13 off-leash dog walking sites.

**1979** – Park **adopts 1979 Pet Policy** allowing off-leash dog walking, but without a special regulation.

**1999** – Park **closes 12 acres to protect sensitive species**/restore habitat in popular dog walking site.

**1999** – **Dog walkers sue**; court ordered preliminary injunction against NPS, disallowing closure until appropriate public notice and opportunity for comment provided.

**2000** – NPS publishes Federal Register notice requesting comments on proposed 12-acre closure.

**2001** – Federal court holds that notice and comment on proposed closure fully complied with 36 CFR 1.5.

**2001** – Park completes 12 acres closure for habitat restoration and protection of sensitive species.

**2001** – CAC **rescinds Pet Policy** as not in line with NPS regulations – significant resistance to NPS leash regulation begins.

**2002** – Federal Register **Advanced Notice of Proposed Rulemaking** (ANPR), requests comment on whether to consider a new regulation for GOGA dog walking. States that park subject to NPS leash regulation, effectively **rescinding the 1979 Pet Policy**.

**2002** –ANPR public comment - 8,580 comments – 71% favor allowing some off-leash use

**2002** –Senior NPS staff review ANPR comments / park resource information; conclude off-leash dog walking may be appropriate in some areas.

**Recommend park-specific dog management planning/rulemaking.** PWR/WASO approval granted.

**2004** – Dog walkers **challenge off-leash citations**. Federal Court sets aside GOGA’s ANPR notice. Rescission of Pet Policy requires notice and comment rulemaking pursuant to 36 CFR 1.5(b). **1979 Pet Policy again status quo.**

**2006** – **Notice of Intent** to prepare EIS for Dog Management Plan for GOGA.

**2006-2008** – **Negotiated Rulemaking Committee** for Dog Management – 3<sup>rd</sup> NPS use of process. Only limited consensus achieved.

**2011** – **Draft Plan/DEIS** for GOGA Dog Management released for comment. - 8,000 comments, many substantive, some hundreds of pages long.

**2013** – Region/WASO **approval to prepare Supplement EIS** (SEIS) to address new information and add alternatives for newly transferred site.

**WESTERN SNOWY PLOVER  
(A FEDERALLY THREATENED SPECIES)  
WINTERING POPULATION AND INTERACTION WITH HUMAN ACTIVITY  
ON OCEAN BEACH, SAN FRANCISCO,  
GOLDEN GATE NATIONAL RECREATION AREA,  
1988 THROUGH 1996**

November 15, 1996

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**US03061**

## Abstract

The Pacific coastal population of the Western Snowy Plover was listed as a federally threatened species in 1993. 15 to 85 non-breeding plovers frequent Ocean Beach for up to 10 months of the year, where they are subjected to intense recreational pressure. The National Park Service established a monitoring program in 1994 to determine numbers and distribution of plovers, people and dogs, and to document current levels of disturbance to plovers, and changes in disturbance levels following implementation of Snowy Plover protection measures, including enforcement of leash restrictions on a 2 mile stretch of Ocean Beach. 90 percent of Snowy Plover observations occur between Stairwell 20 on the north and Sloat Blvd. on the south. The highest numbers of people occur north of Lincoln, while dogs are more evenly distributed along the length of the beach. Of 5,692 dogs counted during surveys, only 10 percent were leashed, 50 percent were classified as roaming with potential to disturb birds, and 6 percent (362 dogs) were observed chasing birds. 19 dogs were observed chasing at least 62 Snowy Plovers in approximately 40 hours of direct plover observations. Roaming dogs inadvertently disturbed at least another 100 plovers during that time period. Plovers tend to take flight more readily, and expend more energy, when approached by dogs than by people on foot. Snowy Plovers were also unintentionally disturbed by sand excavation, people, helicopters, bicycles, vehicles, kite-flying, and a recent oil spill. These disturbances will be addressed in a Snowy Plover management plan under development for Ocean Beach. Control of unleashed pets in areas frequented by Snowy Plovers will increase protection of plovers, and provide benefits to migratory shorebirds that depend on the sandy beach habitat of Ocean Beach for feeding and resting.

$$\begin{array}{r} 62/wk \quad 1500 \\ \underline{52} \quad = 52 \\ 124 \quad 7500 \\ \underline{310} \quad 7500 \\ 3224 \quad + \end{array}$$

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Special thanks to all the dedicated National Park Service volunteers and interns who have made this monitoring program possible, and in particular to Nola Chow, Mike Small, Tom Carlin and Tami Piccone who have so ably coordinated these volunteer efforts.

Cover Photo: Western Snowy Plover in winter plumage on Ocean Beach by Gary Nichols

## Introduction

The Western Snowy Plover is a small, pale colored shorebird with dark patches on either side of the upper breast that breeds on coastal beaches from southern Washington to southern Baja California, Mexico. A total of 28 Snowy Plover breeding areas occur along the Pacific Coast. The majority of birds winter south of Bodega Bay in habitats similar to those used during breeding season including sand spits, dune-backed beaches, unvegetated beach strands, open areas around estuaries, and beaches at river mouths. Prior to 1970, Western Snowy Plovers bred at 53 locations in California. A 62 percent decline in California breeding sites occurred by 1981. Snowy Plovers also suffered at least an 11 percent decline in its adult breeding population between 1981 and 1989. Encroachment of European beach grass, human activity (e.g., walking, jogging, running pets, horseback riding, off-road vehicle use, and beach raking), and predation by mammalian and avian predators are key factors in the decline of Snowy Plover coastal breeding sites and its breeding population (USFWS, 1995).

Based on the concerns identified above, the US Fish and Wildlife Service (USFWS) listed the coastal population of the Western Snowy Plover as a federally threatened species, under the Endangered Species Act (16 USC 1531 et. seq.), on March 5, 1993. Under the Endangered Species Act it is unlawful to "take" a listed species without a permit issued pursuant to requirements of the Endangered Species Act. "Take," as defined in the Act, means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.

The Endangered Species Act, as well as National Park Service (NPS) management policies (NPS, 1988), declare that Federal agencies must conserve endangered and threatened species and utilize their authorities in furtherance of the Act. Actions by Federal agencies that may adversely affect threatened and endangered species or their habitat require formal consultation with the USFWS.

With regard to the Snowy Plover, the USFWS clarified what actions may adversely affect Western Snowy Plovers and their habitat in its proposed designation of critical habitat in 1995 (USFWS, 1995). While many types of projects and activities were identified that could adversely

affect Western Snowy Plover habitat, only a few of those apply to wintering (non-breeding) habitat including the following:

- Human-associated disturbances including:
  - beach cleaning that removes surfcast kelp and driftwood
  - dogs off leash
  - off-road vehicles driven at night
  - falcon flying (prohibited on NPS lands)
- Actions that would promote invasion of non-native vegetation
- Shoreline erosion control projects and activities that may alter the topography of the beach
- Contamination events like oil spills or chemical releases that could contaminate Snowy Plovers or their food sources.

NPS management policies state that active management programs will be conducted as necessary to perpetuate the natural distribution and abundance of threatened or endangered species and the ecosystems upon which they depend (NPS, 1988). NPS Natural Resources Management Guidelines (NPS, 1991) further direct parks to inventory and monitor threatened and endangered species to determine the number of individuals, threats to the species, condition, and population trends. The management guidelines also require parks to manage threatened and endangered species in conformance with the Endangered Species Act, recovery plans, and other appurtenant documents, and to ensure that park operations do not adversely impact these species.

Golden Gate National Recreation Area (GGNRA) is currently developing a Western Snowy Plover management plan that will address all of the issues identified by USFWS as concerns for wintering Snowy Plovers (listed above). In accordance with NPS management policies and guidelines, and to provide data necessary for development of an appropriate management plan that is based upon an understanding of the number and distribution of Western Snowy Plovers on Ocean Beach and their interactions with human activity, GGNRA established a Snowy Plover monitoring program in cooperation with the Point Reyes Bird Observatory (PRBO) in late 1994.

Objectives of the park's Western Snowy Plover monitoring program are to:

- determine the current and long-term population status and trend in Snowy Plover use of Ocean Beach;
- determine spatial distribution of Snowy Plovers on Ocean Beach;
- determine current levels and patterns of use by people and dogs on Ocean Beach;
- document current levels of disturbance to Snowy Plovers on Ocean Beach; and,
- document changes in behavior by people and dogs, and changes in disturbance levels following implementation of Snowy Plover protection measures.

The data on distribution of Snowy Plovers along the beach were used by the USFWS, through formal Endangered Species Act consultation with the NPS, to determine where dogs would be required to be leashed on Ocean Beach.

#### Field Survey Methods

##### Recent Non-NPS Data

Two non-Park Service sources of data on Western Snowy Plover numbers and distribution on Ocean Beach were available and have been included here to provide as much information as possible on Snowy Plover use of Ocean Beach (Lieurance, unpublished data; Baye, unpublished data). The Point Reyes Bird Observatory has coordinated year round efforts to count Snowy Plovers along the California coast. Monthly counts of Snowy Plovers were conducted on Ocean Beach, and all Snowy Plover color leg bands were recorded by PRBO volunteers from 1988 through 1994. The volunteers generally walked Ocean Beach from Lincoln St. to Noriega St. or Sloat Blvd. (or some point in between).

The other data on plover numbers was provided by an interested citizen also involved in coastal erosion projects with the Army Corps of Engineers in San Francisco. The individual walked the beach irregularly between late 1992 and early 1994, and recorded observations for the area between Lincoln St. and Judah or Noriega Streets, and sometimes as far south as Rivera Street.

Annual median and maximum Western Snowy Plover numbers for 1988 through 1994 from the two non-NPS sources are combined and graphed beside NPS data from December 1994 through May 1996 in Figure 1. Although methods through 1994 were not standardized, the data

do provide a comparative index of plover use of Ocean Beach prior to the start of the NPS monitoring program in December 1994.

#### Golden Gate National Recreation Area Monitoring Program

Methods for the GGNRA monitoring program are documented in the park's Snowy Plover monitoring plan developed in conjunction with PRBO (Stenzel, et al., 1995). The monitoring program includes two elements: 1) twice weekly censuses of numbers and distribution of Snowy Plovers, people and dogs along the length of Ocean Beach from the Cliff House on the north, to the Bank Swallow colony site on the south; and 2) focused one hour observations of disturbance to Snowy Plovers. This report does not include analysis of the focused Snowy Plover disturbance observations because of the complex data analysis requirements. Analysis of disturbance study data will be completed under contract with PRBO over the next year.

The Snowy Plover survey year coincides with the pattern of plover breeding and non-breeding activity. The survey year for Ocean Beach is defined as June 1 through May 31, since no plovers are present during the month of June. Fall is defined as the first date plovers are seen through October 31 (the period when birds are leaving breeding areas and expected to be increasing in numbers on Ocean Beach). Winter, or the period of most stable wintering plover numbers, is defined as November 1 through February 28. Spring, March 1 through the last date plovers are seen, represents the period when their numbers are declining on Ocean Beach as they move to breeding areas.

Weather permitting, two surveys are conducted per week, one on a weekend afternoon (high visitation), and one on a weekday morning (low visitation), for comparative purposes. All surveys are conducted by trained volunteers led by a full-time NPS intern responsible for coordination of the monitoring program. Two teams of volunteers begin surveying at the same time opposite Noriega St. on the beach. One team walks north to the Cliff House and one team walks south to the Bank Swallow colony. The use of two survey teams reduces the time required to survey the 3.7 miles of beach and minimizes double counting of plovers, people and dogs. A typical survey takes approximately two hours to complete. Data are recorded by two-city-block sectors (sectors 1-14) as shown in Figure 2. Data collected are summarized in Table 1.

Crissy Field, on the Presidio of San Francisco, was also surveyed for Western Snowy Plovers, using similar methods, once every other week, mid-day on a weekday, throughout the 1995-1996 survey year. No plovers were observed on Crissy Field, and it will not be discussed further in this report.

All data are entered into dBase III+ database files. Data for each season and year are summarized by executing dBase III+ summary program files written by PRBO for GGNRA. Most of the survey data collected are intended to be presented in summary form. Results are presented graphically and discussed in the text. Statistical analysis would be appropriate only after several years of data are available and might be used, for example, to evaluate success in implementation of leash restrictions. Several simple regression analyses were conducted to determine whether a relationship exists between numbers of people or dogs observed per hour and numbers of plovers counted on surveys. These regression analyses were conducted to address the reasonable hypothesis that more plovers would be predicted to use the beach when fewer people and dogs are present (or vice versa).

## Results and Discussion

### Numbers and Seasonal Occurrence of Western Snowy Plovers

Annual median<sup>1</sup> and maximum numbers of Western Snowy Plovers counted (by all sources) on Ocean Beach between 1988 and June 1996 are shown in Figure 1. The mean annual median observed over the entire period is 28 plovers, but ranges from 20 to 40. Figure 3 shows plover counts, from non-standardized variable-length surveys, over each survey year prior to the start of the NPS monitoring program. Non-NPS data were omitted if another close date covered a longer portion of the beach, or if low numbers occurred without explanation within a few days of dates with higher numbers, which were assumed to represent more thorough surveys. High counts occurred in most years between October and December. In general, numbers were variable both within and between years. Snowy Plover censuses conducted as part of the NPS monitoring program for the 1994-95 and 1995-96 survey years are shown in Figure 4. NPS surveys began in December 1994.

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<sup>1</sup> The median is defined as the middle value in a distribution, above and below which lie an equal number of values. Use of the median rather than the average or mean removes the influence of extreme values.

A median of 60 plovers occupied Ocean Beach from December 1994 until late February 1995. Numbers declined steadily in March and April with the last plover seen on May 13, approximately one month later than expected in normal years. Late spring storms delayed movement of birds to breeding areas in 1995.

The first Snowy Plovers of the 1995-96 survey year were observed on July 4. Numbers increased rapidly and reached 35 by early September, remaining fairly stable around the winter median number of 27 plovers, then slowly declined beginning in early February. The last plovers of the 1995-96 survey year were seen on April 20, three weeks earlier than the previous year. Surveys were suspended during the government shutdown in December 1995 and early January 1996.

Several factors probably account for the variability in plover counts during 1994-95, including changes in actual plover numbers on the beach, possible double-counting (and/or under-counting) of birds that flew from one part of the beach to another, difficulty in identifying plovers in flight, and potential influence of disturbance on plover numbers or behavior. On both the February 25, 1995 shipwreck survey date (when an ATV transported archeological survey equipment up and down the high tide line of the beach continuously throughout the plover survey), and on March 25, 1995 when nearly 2,000 people were counted on the beach, several scenarios for reduced plover counts are possible. More plovers may have been flying than usual due to an increase in frequency of disturbance; some plovers may have departed temporarily from Ocean Beach; and/or the number of people on March 25 may have made it physically impossible to detect plovers that roosted on the most protected areas of the beach.

The median number of plovers using Ocean Beach in winter was 60 in 1994-95, but declined to 27 during the 1995-96 survey year. Several explanations are possible: 1) the City of San Francisco sand excavation project in December 1995 and January 1996 and the increased disturbance it created may have reduced plover numbers; 2) the presence of Peregrine Falcons in December 1995 and January 1996 may have influenced the local numbers and distribution of plovers; and/or 3) the narrower beach width during the 1995-96 survey year may have reduced plover habitat quality or quantity.

The sand excavation project (conducted following formal consultation with the USFWS as required under the Endangered Species Act) did create a significant amount of additional

disturbance in the preferred plover roosting area along the seawall between Noriega St. and Santiago St. (GGNRA, 1996). In addition, the re-contouring of the beach may have resulted in changes in the beach profile<sup>2</sup> that may have influenced plover microhabitat, making it less attractive to them. However, plover numbers on Ocean Beach were similar before, and for approximately a month after, the sand movement operation although their distribution shifted north to the Lincoln to Lawton roost area. Plover numbers began to decline much earlier in 1996 than in 1995, as would be expected under normal breeding season conditions.

Peregrine Falcons (federally listed as endangered) were observed during Snowy Plover surveys on December 6, 1995 and on January 17, 1996, both times attacking and harassing larger shorebirds over the water and beach. Peregrines had not been observed on previous surveys although there is a known winter roost site nearby. Lynne Stenzel, of PRBO (personal communication), has observed that the presence of Peregrines can have a profound effect on the local distribution and abundance of shorebirds. Peregrines undoubtedly influence Snowy Plover numbers and use of Ocean Beach to some degree, and they are expected to forage irregularly in the area.

Beach profile is suspected to be one of the most significant factors influencing Snowy Plover habitat suitability and availability on Ocean Beach. Data from aerial photos and cross-sectional measurements of the beach need to be analyzed to substantiate such a relationship, and to document how beach width and profile change between years. At the start of GGNRA plover monitoring in December 1994 when 60 Snowy Plovers were present on Ocean Beach, Gary Page, PRBO, noted the extreme width of the beach compared to his observations in earlier years. Casual observations made during plover surveys in 1995-96 indicated a significant narrowing of the beach profile over the previous year (concurrent with a 50% decline in median winter plover numbers), presumably as a result of the severe storms that occurred during the Spring, and in December, of 1995.

The annual median number of Western Snowy Plovers documented to use Ocean Beach since 1988 represents a 100% mean increase over estimates from statewide censuses in California and Oregon conducted between 1979 and 1985 (Page et al. 1986). 26 counts over that 6 year period yielded median counts of from 2 to 14 Snowy Plovers on Ocean Beach. The wintering

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<sup>2</sup> The beach profile is defined by the width and slope of the beach.

population on Ocean Beach was estimated to be 14 Snowy Plovers for the 9.3 km of sand beach in San Francisco County. All plovers encountered during the census period occurred on Ocean Beach. Maximum Snowy Plover counts for the 1979 to 1985 period ranged from 4 to 16, compared to maximum counts since 1988 of from 38 to 85 birds.

Two possible explanations for the dramatic changes in plover numbers between 1979-1985 and 1988-1996 are: 1) factors that reduced Snowy Plover habitat suitability or availability elsewhere, possibly associated with changes in salt pond management in San Francisco Bay, causing them to shift to other locations; and/or 2) changes in beach width, which was undoubtedly extremely narrow during the early 1980's when severe coastal erosion occurred in the Bay Area. Rainfall between 1979 and 1985 averaged well above normal and included an *el niño* event.

A few color-banded Western Snowy Plovers reside on Ocean Beach each winter. Ocean Beach plovers have been banded in Monterey Bay as breeding adults, at Moss Landing as newly-fledged chicks, as well as in Oregon.

#### Spatial Distribution of Snowy Plovers on Ocean Beach

Western Snowy Plovers consistently roost (or rest) in two primary areas on Ocean Beach, the first is between Lincoln and Lawton Streets, and the second is between Noriega and Rivera Streets (the promenade sea wall). Plovers occasionally roost in other areas and they tend to be more spread out along the beach when feeding. Figures 5, 6 and 8 show the median and maximum numbers of Snowy Plovers that occurred within each of the 14 survey sectors during fall, winter and spring of 1994-95 and 1995-96 (no data for fall 1994). Figures 5, 7 and 9 show the percent of surveys on which Snowy Plovers were encountered within each sector during each season. All seasons show approximately the same patterns of use, with variation between years in numbers of plovers and preferred resting areas.

Since the surveys began, over 90 percent of Snowy Plover occurrences have been between Stairwell 20 (south of Fulton St.) on the north and Sloat Blvd. on the south. The highest number of plovers has generally been observed between Noriega and Rivera Streets, except in spring when they have been more evenly split between the two primary roost sites. Smaller numbers of plovers are regularly seen along the length of the beach from Stairwell 20 to Sloat Blvd., with 1-2 plovers occasionally seen north and south of this core area.

The distribution of Snowy Plovers in the winter of 1995-96 appears to be more restricted to the primary roost areas than in 1994-95 (Figures 6 and 7). Narrower beach width following intense storms in December may explain these differences. Figure 9 also shows a shift during spring 1996 to the Lincoln to Lawton roost area possibly as a consequence of winter sand excavation by the City of San Francisco that changed the beach profile within the Noriega to Rivera roost area.

#### Patterns of Use by People and Dogs on Ocean Beach

The median and maximum numbers of people encountered on surveys largely reflects the location of parking lots along Ocean Beach (Figure 10) with the highest number of people counted north of Lincoln St., followed by high numbers of people on the beach near Sloat Blvd., with the lowest number of people encountered between Lawton and Vicente Streets. High numbers of people use the beach in the vicinity of the Lincoln to Kirkham plover roost area, while the lowest numbers of people frequent the primary plover area between Noriega and Rivera Streets. Although no data are collected on what part of the beach profile is most actively used, a significant portion of human activity occurs along the water's edge where walking is easiest. A previous analysis of only the winter and spring 1994-95 data showed a more even distribution of people along the length of the beach. The fall survey period (from July through October) includes two summer months, as well as the period of warmest weather in the fall. The addition of this high beach use period into the analysis demonstrates that the area north of Lincoln receives the highest proportion of beach activity year round.

The median and maximum number of dogs encountered on surveys reflects a different pattern of beach use by dogs and their owners (Figure 11). The median number of dogs per survey sector is fairly even from Fulton St. south, a reflection of use by local neighborhood dog owners who regularly walk their dogs on the beach. Slightly higher median dog numbers occur near Lincoln St. and near Pacheco St., possibly due to the slightly greater proportion of time spent surveying those areas where the greatest numbers of Snowy Plovers occur. The high maximum numbers of dogs between Stairwell 20 and Lincoln, and at Sloat Blvd. probably reflects additional dog owners driving to the beach during periods of good weather. Relatively high numbers of dogs do occur in the same areas preferred by Snowy Plovers.

Ocean Beach receives significantly greater use on weekends than it does on weekdays (Figure 12). Beach use is also higher during the fall and spring survey periods, but exhibits extreme fluctuations, particularly on weekends. The number of people on the beach is influenced by whether it is a weekday or a weekend, and by the weather conditions on any given day. Days with the highest numbers of people are warm and sunny, with little wind. The number of dogs on the beach does not fluctuate as dramatically as the number of people. Figure 14 illustrates that as the number of people on the beach increases by as much as ten-fold, the number of dogs approximately doubles. This probably reflects a large influx of beach-goers from outside the local neighborhoods who drive to the beach on nice days, but usually leave their pets at home.

#### Relationship Between Numbers of People and Dogs and Numbers of Plovers

Regression analyses were conducted to determine whether a relationship exists between the number of people per hour, and the number of dogs per hour, encountered during surveys, and the number of Snowy Plovers on the beach at the same time. When the extreme value for number of people from each year is omitted,  $R^2 = .11$  in 1994-95 and  $.16$  in 1995-96. This indicates that the number of people per hour on the beach explained only 11% and 16% of the variation in Snowy Plover numbers, respectively. When the extreme value for 1994-95 (March 25, 1995) is included,  $R^2$  increases to  $.31$ . Several possible explanations for the low number of plovers that day were described previously. Inclusion of the extreme value from 1995-96 had the opposite effect and resulted in a decrease in  $R^2$  to  $.07$ . All results are significant at  $p < .10$  (the probability is  $<10\%$  that these results occurred by chance).

The number of dogs per hour on the beach explained only 10% and 12% of the variation in plover numbers for 1994-95 and 1995-96, respectively. Factors other than number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach.

### Disturbances<sup>3</sup> to Snowy Plovers on Ocean Beach

The degree of dog control on Ocean Beach was also evaluated during surveys (Figure 13). An average of 10 percent of dogs were leashed. Of the 90 percent of unleashed dogs, 34 percent were within 10 feet of their owners when observed and appeared to be under "voice control" at the time. Fifty percent of dogs were classified as roaming, and 6 percent (362 dogs) were observed chasing birds. Any unleashed dog, but particularly those identified as roaming, has the potential to chase birds or plovers. In most cases, dogs chased gulls and shorebirds other than plovers.

Wintering Snowy Plovers are not susceptible to the same frequency of chasing and disturbance as Sanderlings and other shorebirds that spend most of their time along the water's edge. The Snowy Plover's cryptic coloration and their habit of roosting, sometimes nearly invisibly, in footprints, tire tracks and other depressions in the sand, protect them to a limited degree. Nevertheless, during the 111 surveys conducted between December 1994 and May 1996 (approximately 40 total hours of direct Snowy Plover observation), 19 dogs were observed deliberately chasing Snowy Plovers. At least 62 Snowy Plovers were disturbed by these 19 dogs (from 1 to 34 Snowy Plovers disturbed per event) over a time period equal to less than one week of daylight hours. On another 15 occasions, at least 100 additional Snowy Plovers were inadvertently disturbed by roaming dogs or dogs chasing other birds. (The actual number of plovers disturbed was not consistently recorded until 1995-96.) Chasing of plovers by dogs constitutes harassment, and consequently "take" of a threatened species under the Endangered Species Act and as defined under the activities determined to adversely affect Snowy Plovers (USFWS, 1995).

People also frequently and inadvertently disturb plovers, but plovers appear more likely to walk or run, than fly, when disturbed by people as compared to dogs. Flying has the greatest energy cost to plovers and is the most disruptive to their feeding and resting activities.

During the 70 surveys conducted in 1995-96 (approximately 24 total hours of direct plover observation), 48 Snowy Plovers were inadvertently disturbed by people, including joggers.

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<sup>3</sup> A disturbance event is defined here as an obvious change in plover activity that was clearly elicited by an observed disturbance agent like a person, a dog, vehicles, helicopters, etc. Plover activities include roosting, standing, walking, running, and flying. A change, elicited by an observed disturbance agent, from a less energetic activity to one that requires more energy is classified as a disturbance.

surfers, and beach walkers. Another 21 plovers were disturbed by low-flying helicopters or airplanes, 15 by bulldozers excavating sand, 5 by bicycles and vehicles, and 6 by a kite flying nearby. Although not part of the survey years included in this report, in November 1996 at least 10 Snowy Plovers were contaminated by oil from the Cape Mohican spill in San Francisco Bay.

Western Snowy Plover disturbance associated with the City of San Francisco sand excavation project during December 1995 and January 1996 is described in a separate report to the USFWS (GGNRA, 1996).

### Conclusions

The Western Snowy Plover was federally-listed as a threatened species in 1993. By law, the NPS is required to actively manage its lands to perpetuate the natural distribution and abundance of threatened and endangered species and the ecosystems upon which they depend. NPS management guidelines also direct parks to monitor threatened and endangered species to determine their numbers, threats to the species, condition, and population trend. GGNRA established its Snowy Plover monitoring program in December 1994.

GGNRA monitoring results, and surveys conducted since 1988 by PRBO and others, indicate that approximately 15 to 85 Western Snowy Plovers occur on Ocean Beach between July 1 and May 15. 25 to 60 Snowy Plovers regularly reside on the beach in mid-winter. These numbers represent a 100 percent increase over the 1979 to 1985 period, possibly due to habitat loss elsewhere or recent increased average beach width. Only extreme levels of disturbance (constant ATV traffic or presence of 2000 people per hour on surveys) corresponded to greatly reduced numbers of plovers, possibly due to departure from Ocean Beach, increased flight, or greater difficulty in locating plovers.

Western Snowy Plovers regularly occupy two primary roost areas— from Noriega to Rivera Streets, and from Lincoln to Lawton Streets. Approximately 90 percent of plover occurrences since December 1994 were between Stairwell 20 on the north and Sloat Blvd. on the south. These data on distribution of Snowy Plovers along the beach were used by the USFWS to determine where dogs would be required to be leashed on Ocean Beach.

Number of people on the beach is directly related to day of the week and weather conditions, with the greatest number of people occurring north of Lincoln St. Dogs are more

evenly distributed along the length of the beach, indicating regular local neighborhood use of the beach for dog walking. The number of Snowy Plovers occurring on the beach is not closely related to the number of people or dogs using the beach at the same time.

5,692 dogs were counted during surveys, of which 10 percent were leashed, 50 percent were roaming (with potential to chase birds), and 6 percent were chasing birds. 19 dogs were observed chasing a total of 62 Snowy Plovers (in approximately 40 hours of direct observation). Chasing of plovers clearly meets the definition of harassment and "take" under the Endangered Species Act and as specifically defined for Western Snowy Plovers. Roaming dogs inadvertently disturbed at least another 100 plovers.

Plovers, as well as other shorebirds, appear to be more prone to taking flight, and consequently expending more energy, when approached by dogs than by people on foot. Disturbance results in lost energy intake due to reduced foraging and feeding efficiency, and increased energy expenditure as a result of fleeing from disturbance. Little research has been conducted on the energetic effects of disturbance, and on whether individuals can compensate for this lost energy intake and increased energy expenditure. It is thought that small species (like plovers) are more energetically stressed than larger species if they are repeatedly forced to take flight, because of their greater surface area to body weight ratio. These species may exhibit a greater tolerance for human activity in order to minimize energy expenditure (Knight, et. al 1995).

Snowy Plovers have also been inadvertently disturbed by sand excavation, people, helicopters, airplanes, bicycles, vehicles, kite-flying, and the recent oil spill. Each of these issues will be addressed in the management plan which is currently being written. The plan may recommend additional constraints that are appropriate and feasible to apply to other activities, including park operations, that may have adverse impacts on Western Snowy Plovers on Ocean Beach.

Control of unleashed pets in areas frequented by Snowy Plovers will increase protection of plovers, and will provide even greater benefits to the large numbers of migratory shorebirds, gulls and terns that also depend on the vast expanse of sandy beach habitat on Ocean Beach for feeding and resting.

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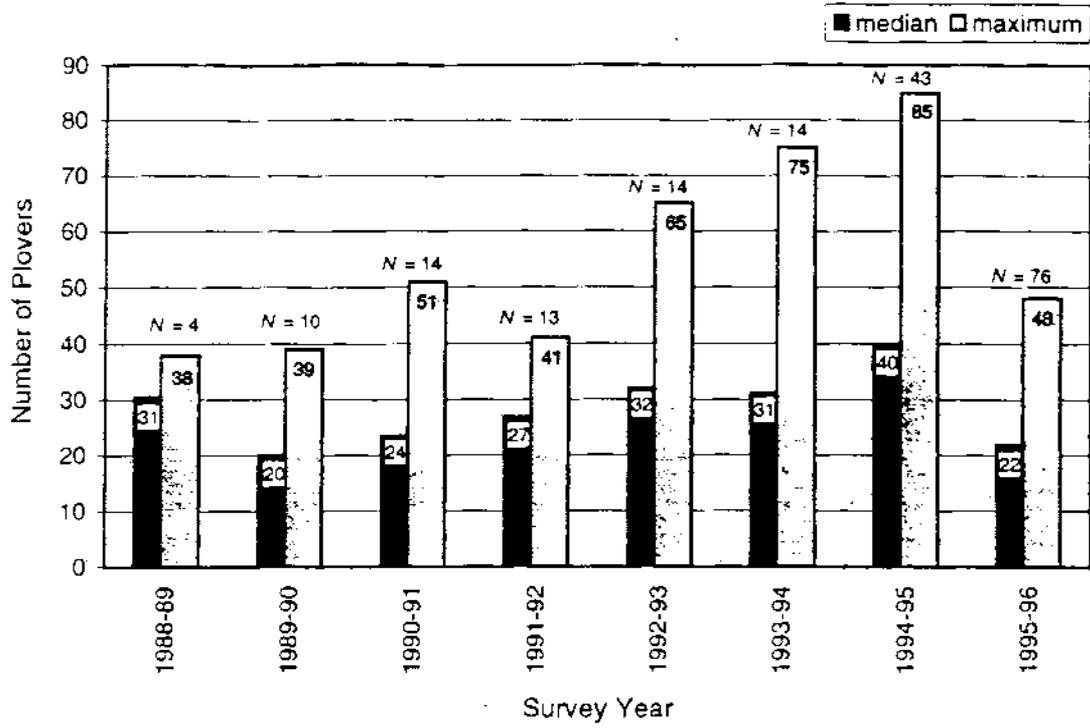
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Table 1. Data Collected on Snowy Plover Surveys

Snowy Plovers	People and Dogs
weather	sector
tide height and flow	number of people
sector	number of dogs leashed
number of plovers	number of dogs unleashed (within 10 ft. of owner)
feeding or not-feeding	number of dogs roaming
flying and direction of flight	number of dogs chasing birds
beach zone	number of dogs chasing plovers
microhabitat	number of horses, vehicles, airplanes, helicopters, raptors
color leg bands	plover response to disturbance

Figure 1. Annual Median and Maximum Numbers of Western Snowy Plovers on Ocean Beach, 1988 through 1996, Golden Gate National Recreation Area



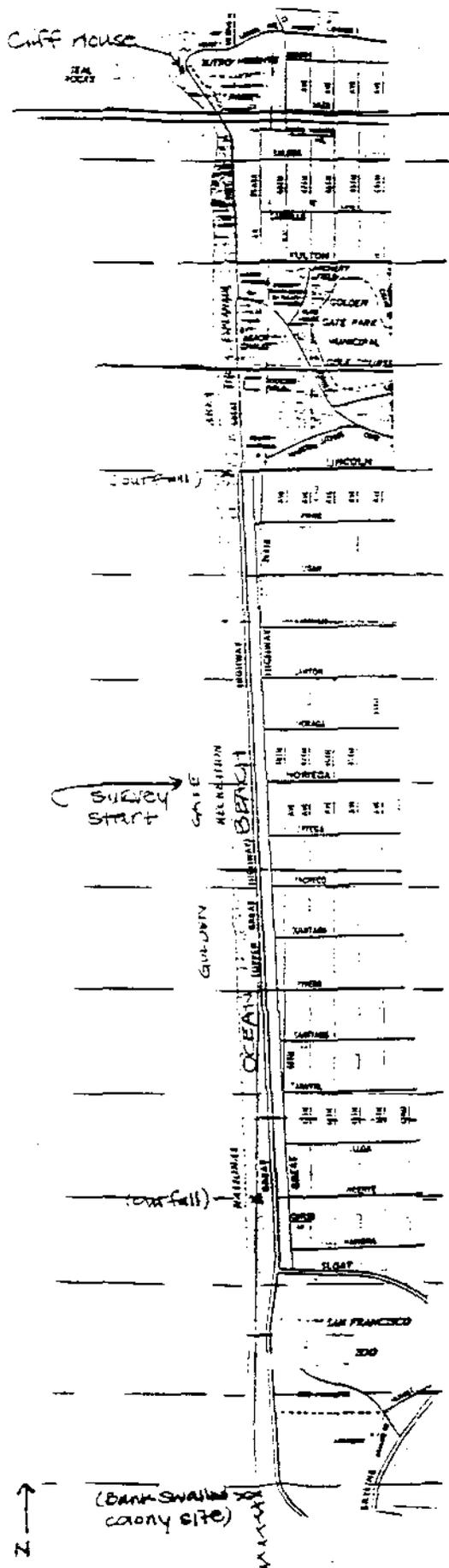
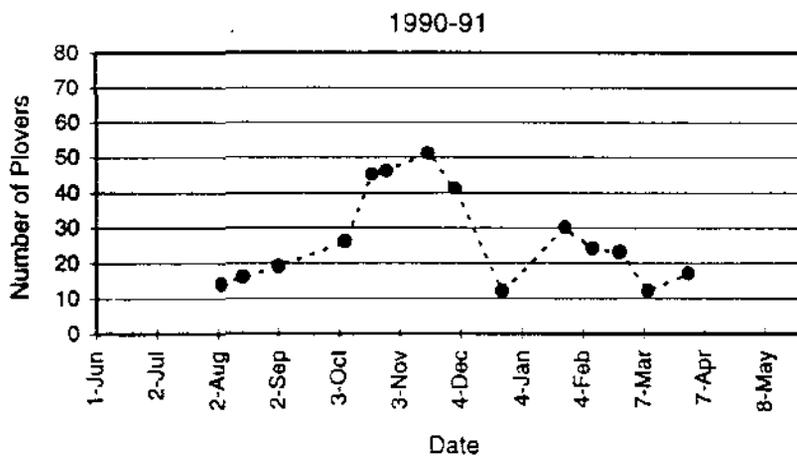
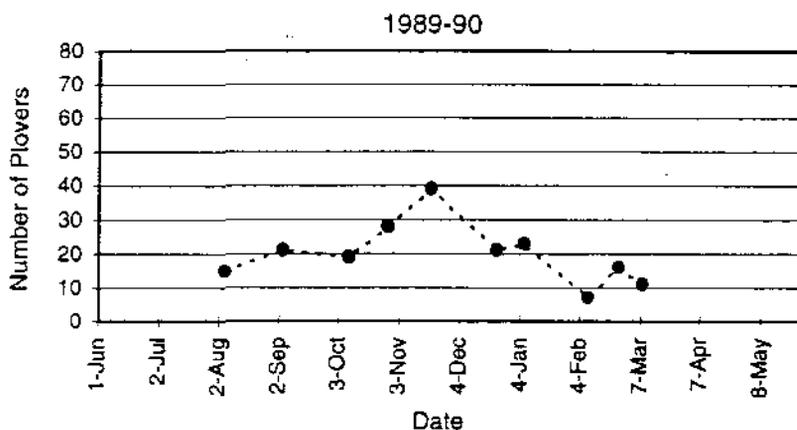
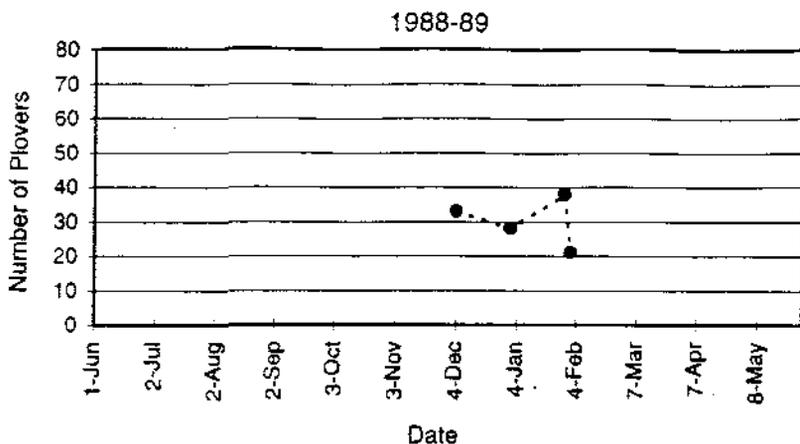


Figure 2. Western Snowy Plover Monitoring Plan  
Ocean Beach Sector Map

area: 14 sections from Cliff House to bank swallow sites  
section length: 1,420' for sections 2-11; \*sections 1, 12-14 are slightly shorter

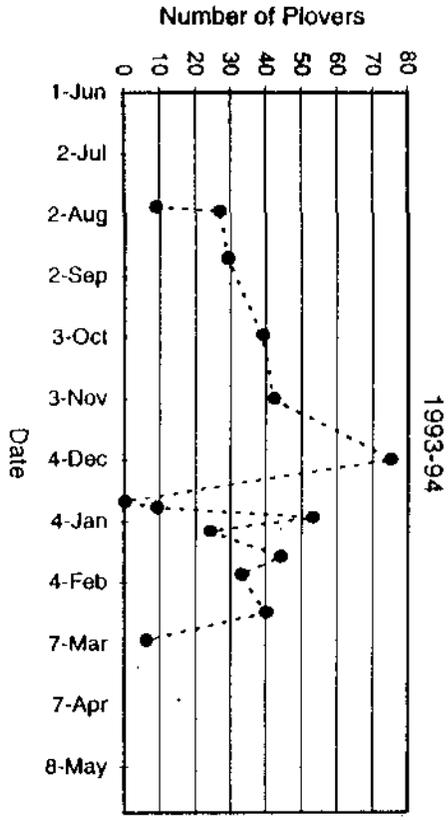
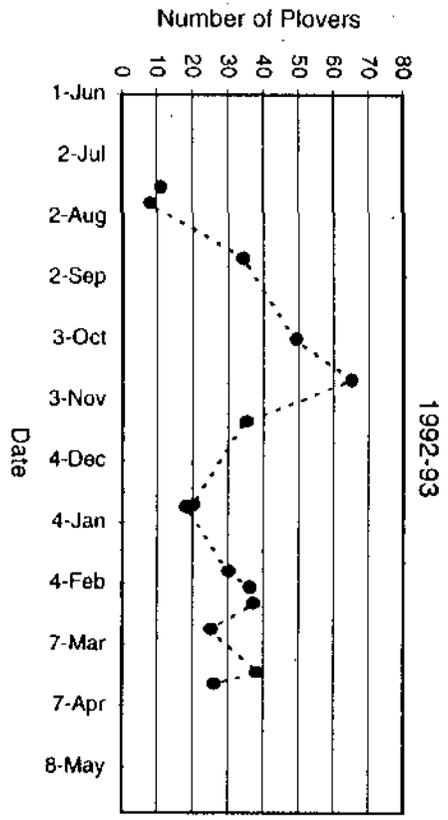
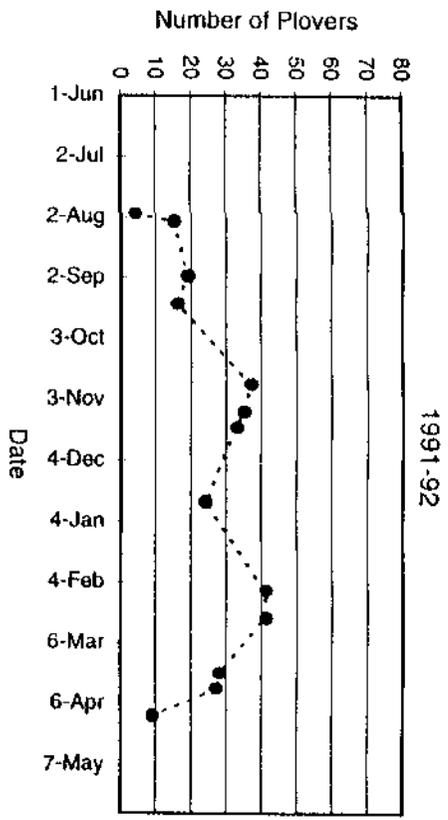
- 1 = seawall to stairwell #6 \*  
(north end - near Balboa St.)
- 2 = stairwell #6 to #13  
(near Balboa St. - Fulton St.)
- 3 = stairwell #13 to #20  
(Fulton St. - mid GGP)
- 4 = stairwell #20 to stormwater outfall  
(mid GGP - Lincoln St.)
- 5 = stormwater outfall to Judah St. beach access trail  
(Lincoln St. - Judah St.)
- 6 = Judah St. access to Lawton St. access
- 7 = Lawton St. access to Noriega St. access
- 8 = Noriega St. access to Pacheco St. access
- 9 = Pacheco St. access to Rivera St. access
- 10 = Rivera St. access to Taraval St. access
- 11 = Taraval St. access to stormwater outfall  
(Taraval St. - Vicente St.)
- 12 = stormwater outfall to 3rd access of first overlook\*  
(Vicente St. - Sloat Blvd. overlook)
- 13 = 3rd access of first overlook to 1st access of second overlook\*  
(Sloat Blvd. overlook to 2nd overlook)
- 14 = 1st access of second overlook to Bank Swallow sign\*

Figure 3. Historical Western Snowy Plover Population Data for Ocean Beach, San Francisco, 1988 through 1994. Variable Length Surveys from Lincoln South. (Data Sources: C. Lieurance, L. Lieurance for PRBO band surveys; and P. Baye)



(figure continues)

Figure 3. (continued)



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Figure 4. Numbers of Western Snowy Plover by Date on Ocean Beach, San Francisco, 1994-95 and 1995-96 Survey Periods, Golden Gate National Recreation Area

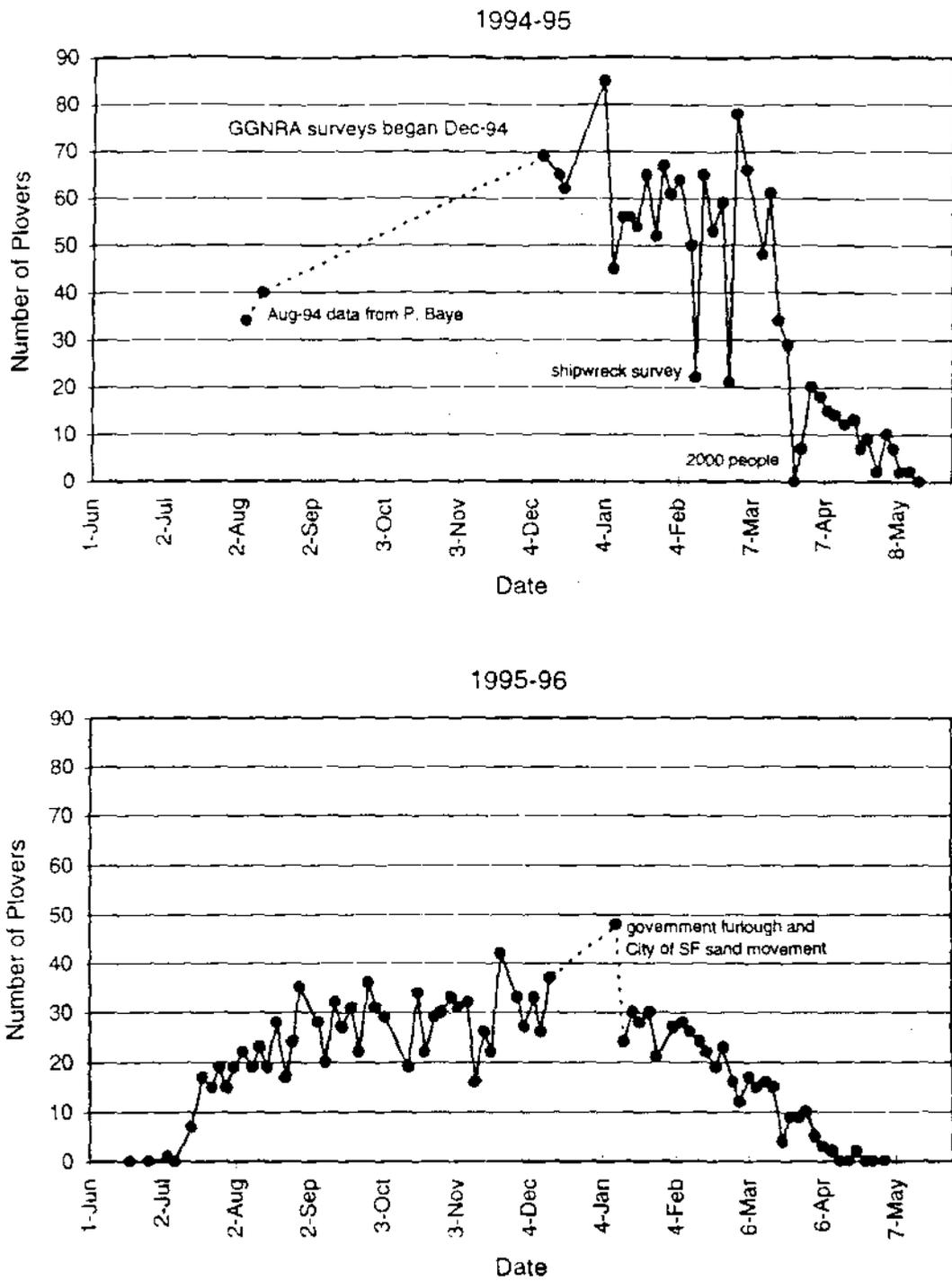


Figure 5. Median and Maximum Numbers of Western Snowy Plovers and Percent Occurrence on Surveys by Two-City-Block Sector on Ocean Beach, San Francisco, Fall 1995-96 ( $N=27$ ), Golden Gate National Recreation Area

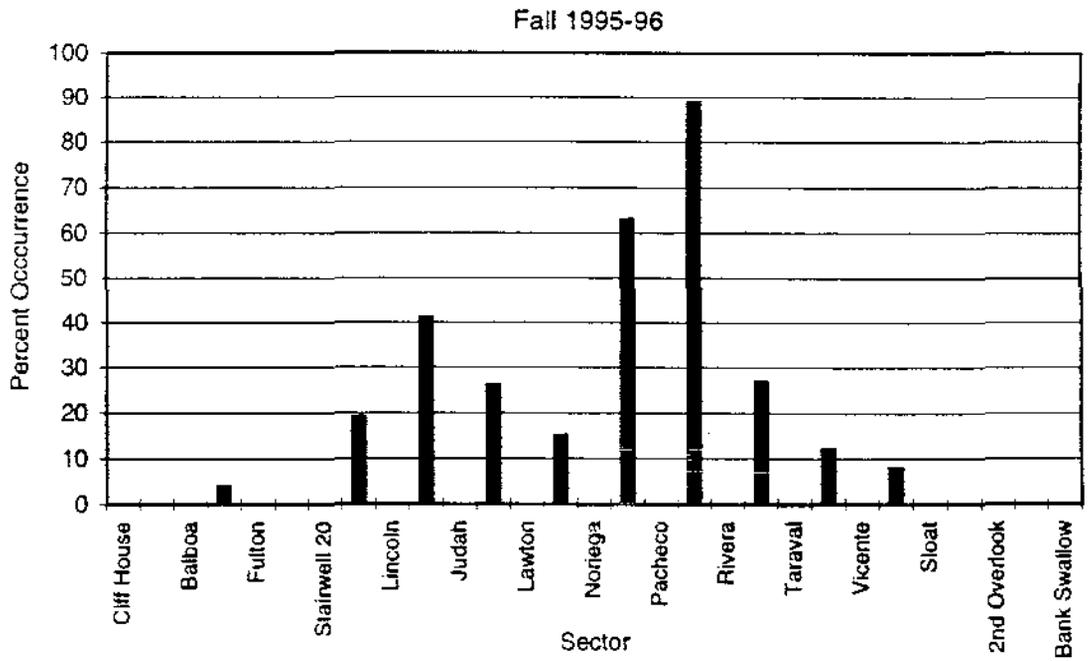
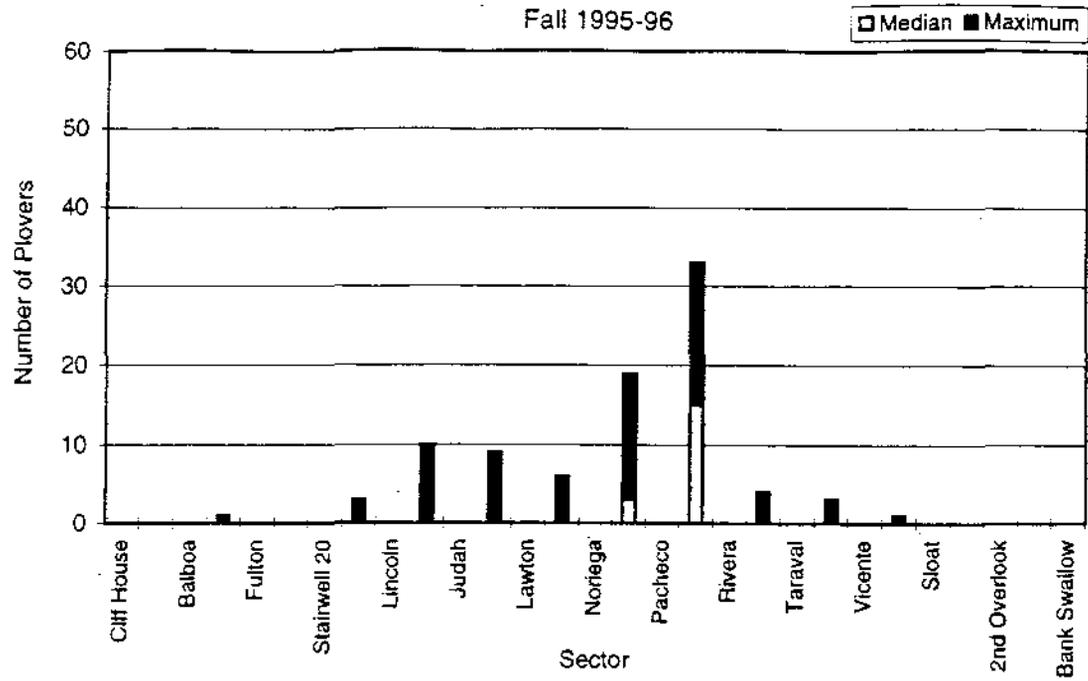


Figure 6. Median and Maximum Numbers of Western Snowy Plovers by Two-City-Block Sector on Ocean Beach, San Francisco, Winter 1994-95 ( $N=20$ ) and Winter 1995-96 ( $N=27$ ), Golden Gate National Recreation Area

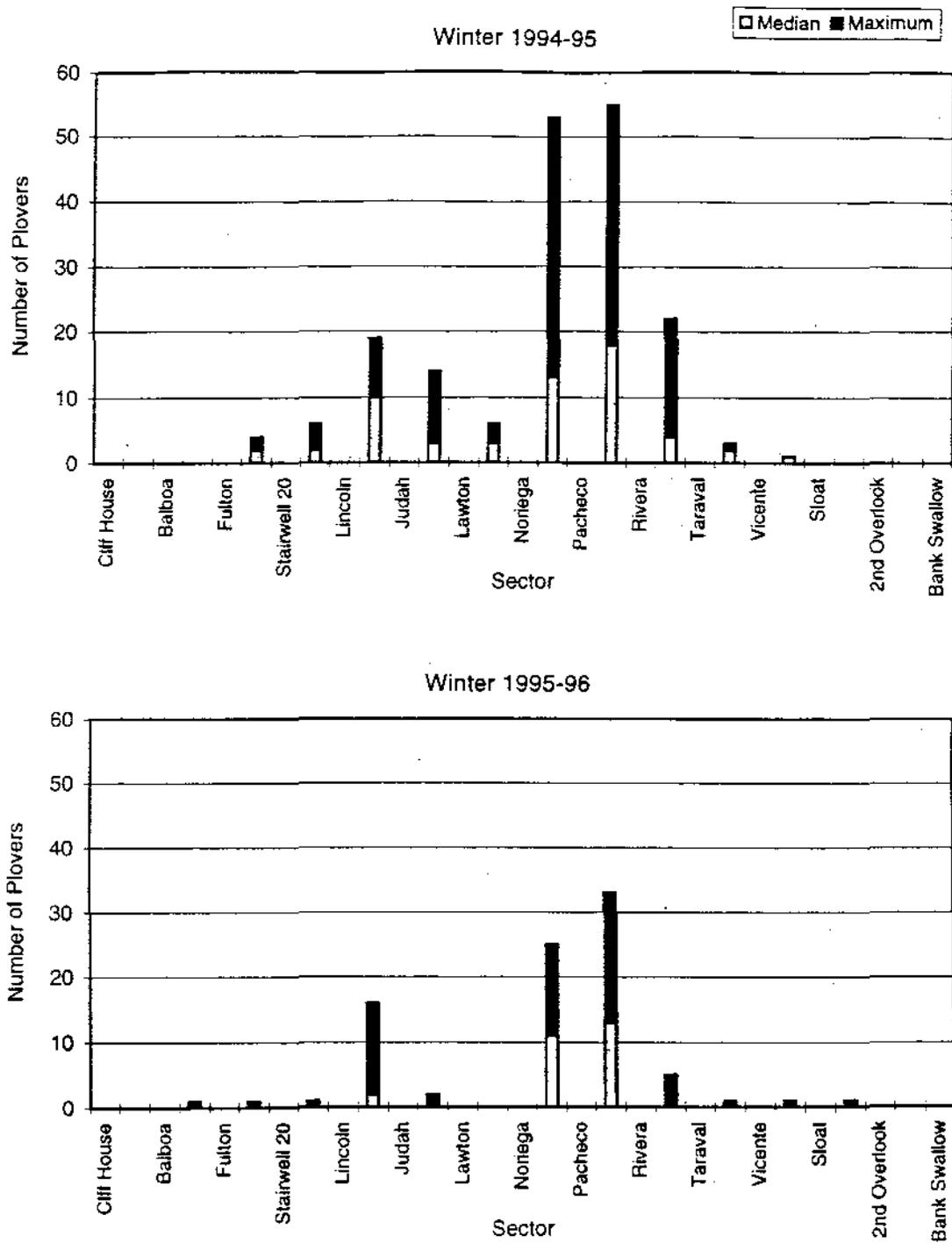


Figure 7. Percent Occurrence of Western Snowy Plovers by Two-City-Block Sector on Ocean Beach, San Francisco, Winter 1994-95 (N=20) and Winter 1995-96 (N=27), Golden Gate National Recreation Area

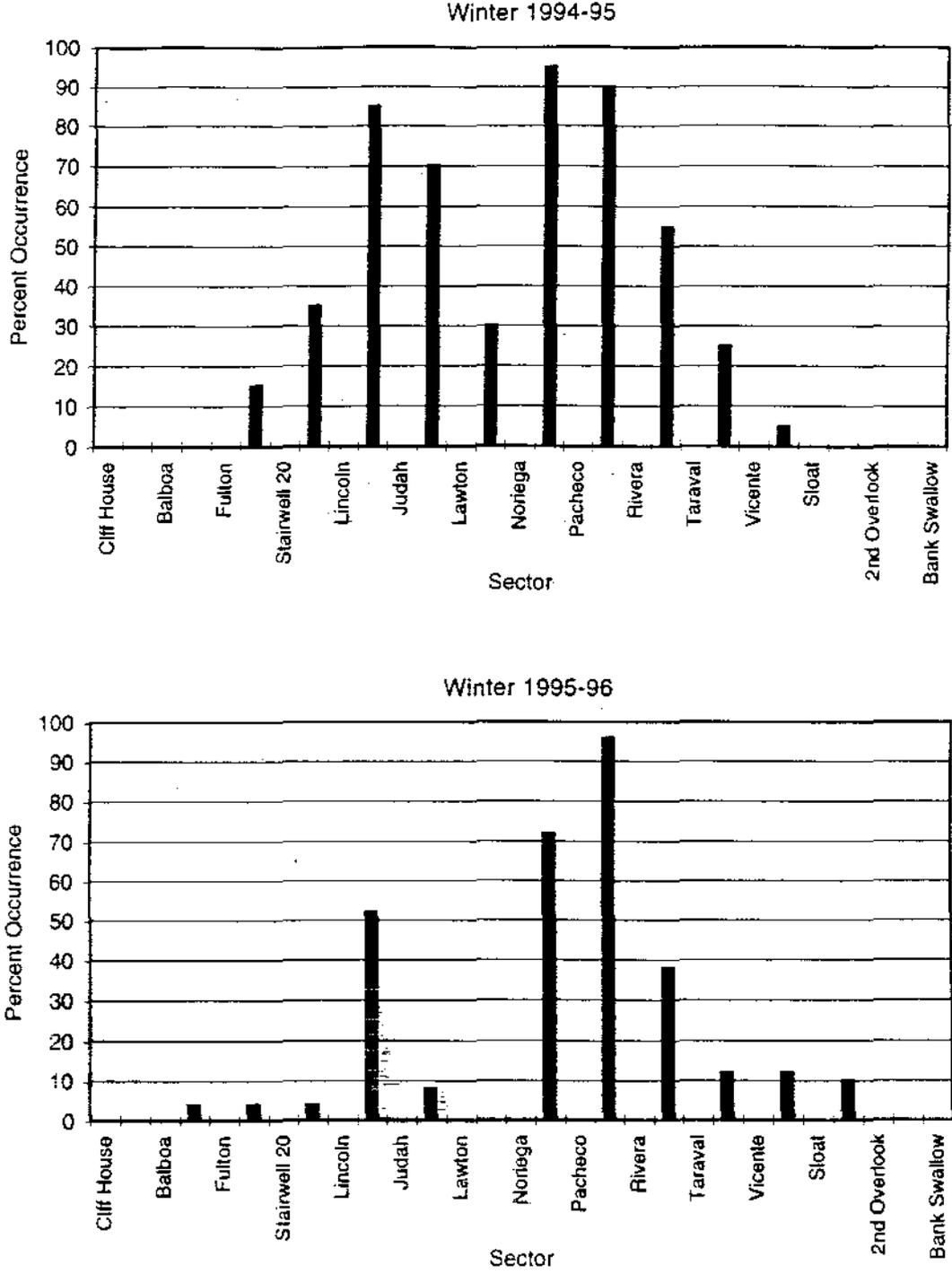


Figure 8. Median and Maximum Numbers of Western Snowy Plovers by Two-City-Block Sector on Ocean Beach, San Francisco, Spring 1994-95 (N=21) and Spring 1995-96 (N=18), Golden Gate National Recreation Area

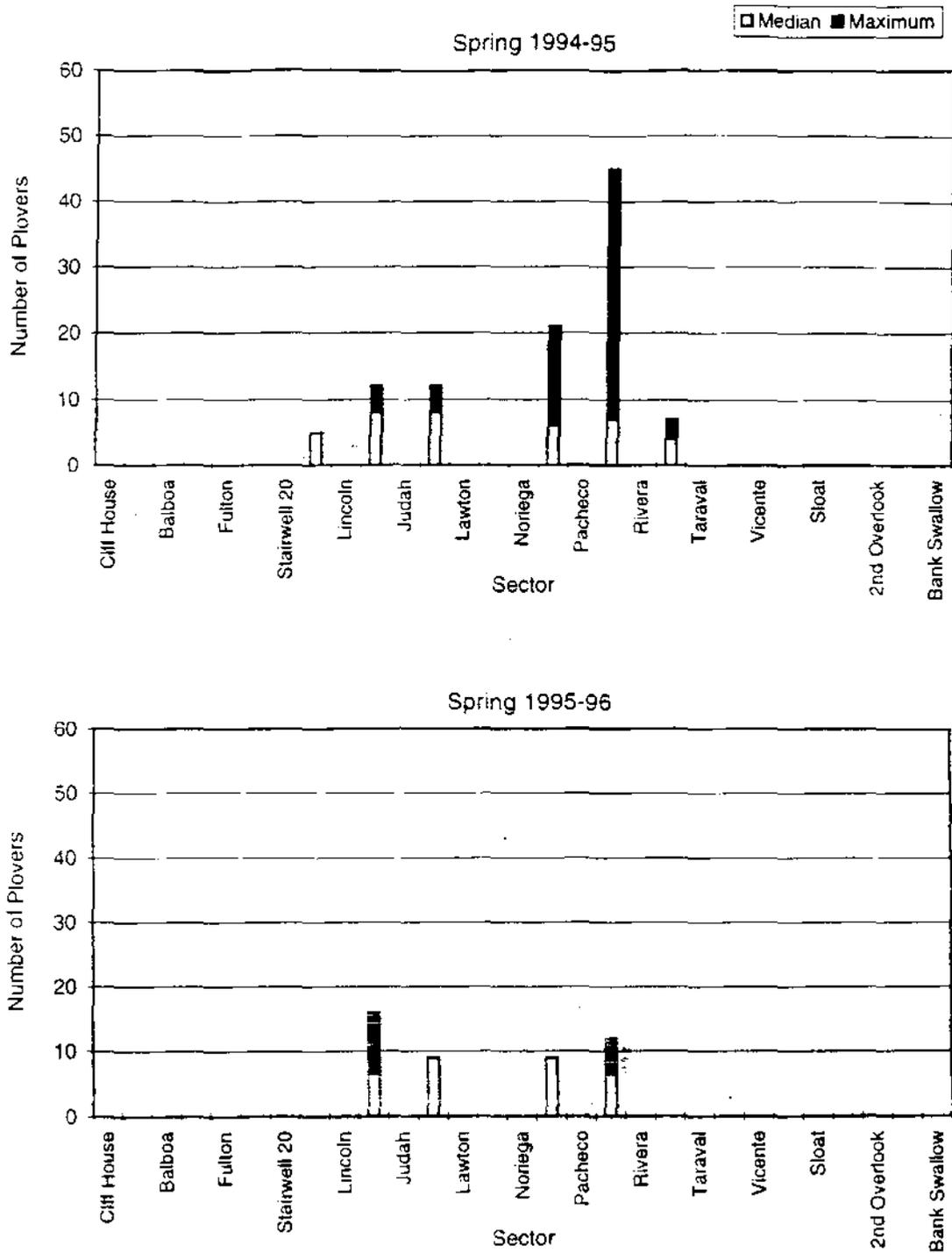


Figure 9. Percent Occurrence of Western Snowy Plovers by Two-City-Block Sector on Ocean Beach, San Francisco, Spring 1994-95 (N=20) and Spring 1995-96 (N=18) Golden Gate National Recreation Area

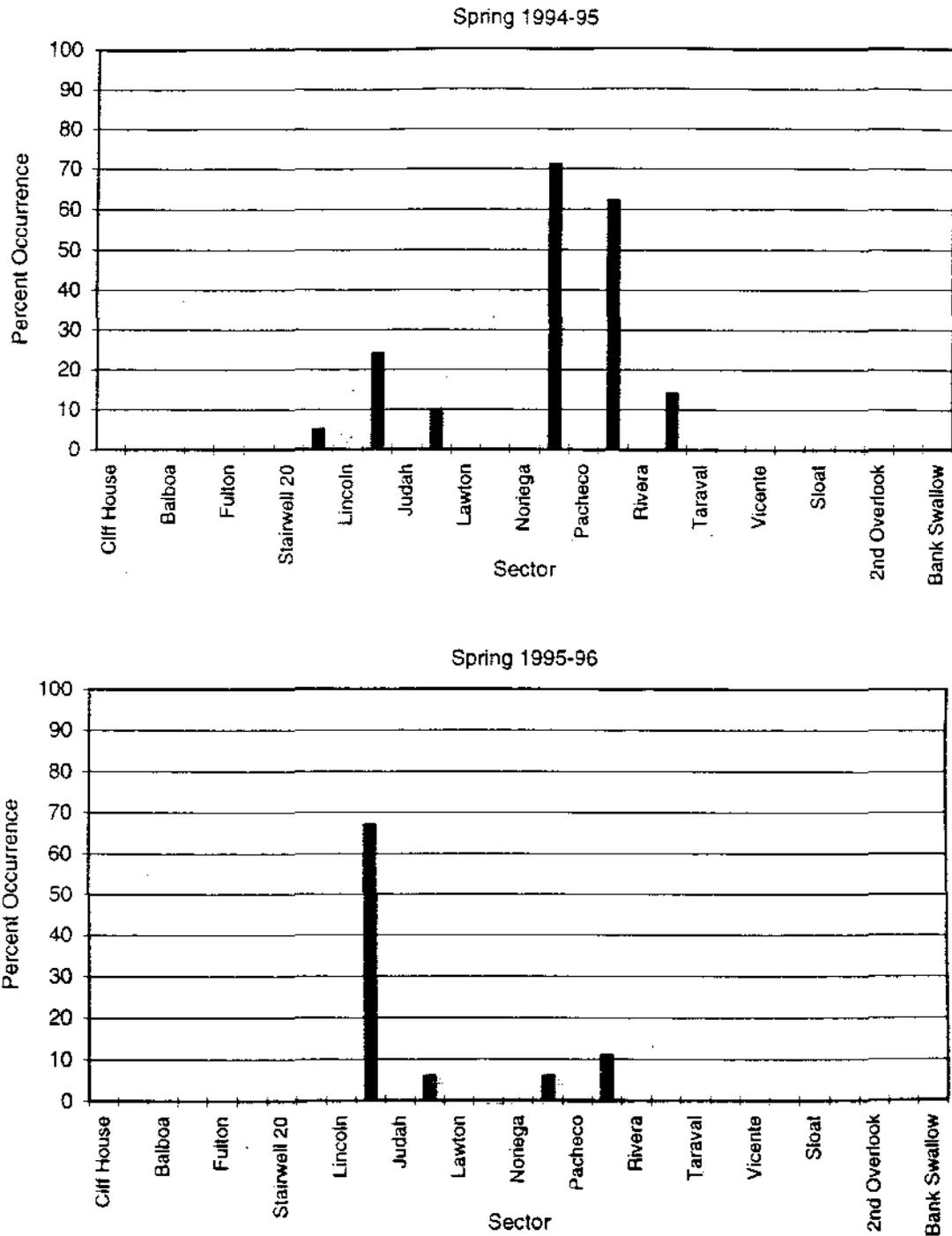


Figure 10. Median and Maximum Numbers of People Encountered on Surveys, by Two-City-Block Sector on Ocean Beach, San Francisco, July 1995 through April 1996, Golden Gate National Recreation Area

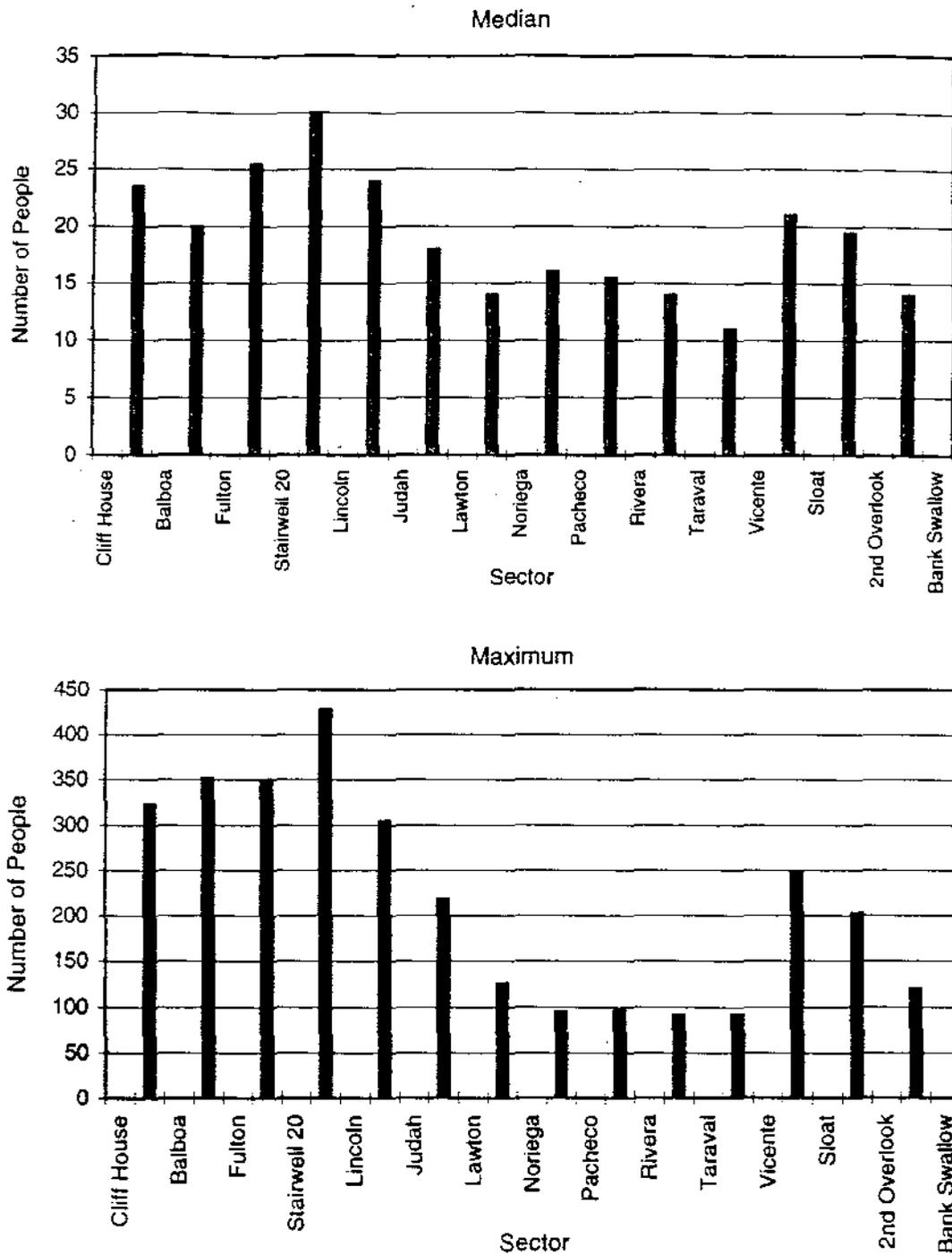


Figure 11. Median and Maximum Number of Dogs Encountered on Surveys, by Two-City-Block Sector on Ocean Beach, San Francisco, July 1995 through April 1996, Golden Gate National Recreation Area

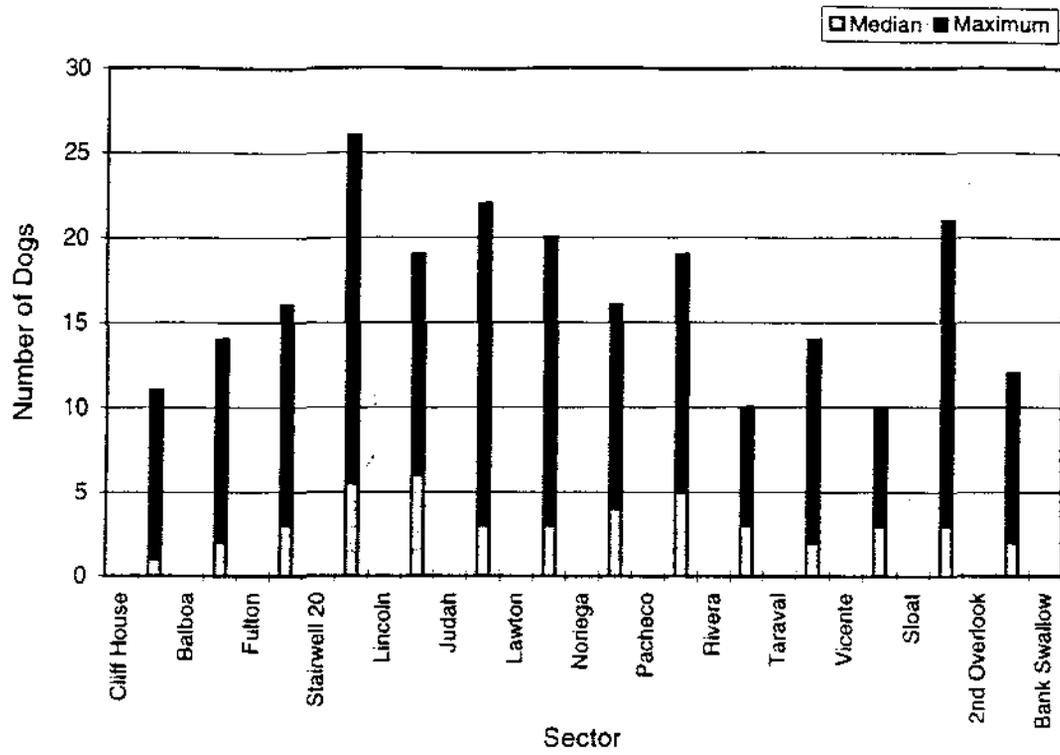


Figure 12. Number of People and Dogs Encountered Per Hour on Weekdays and Weekends on Ocean Beach, July 1995 through April 1996, Golden Gate National Recreation Area

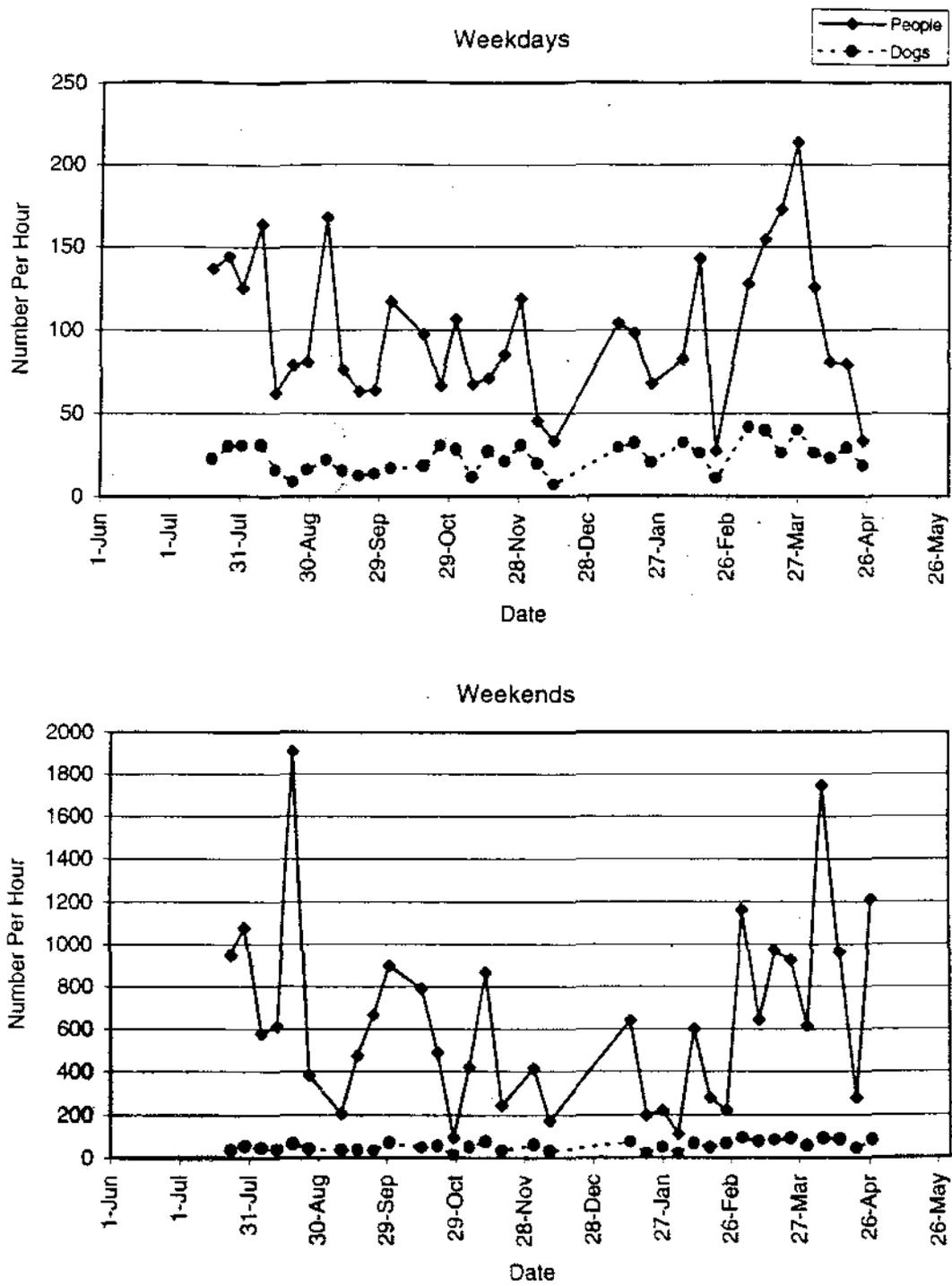


Figure 13. Degree of Dog Control on Ocean Beach, San Francisco, December 1994 through May 1996 ( $N=111$ ), Golden Gate National Recreation Area

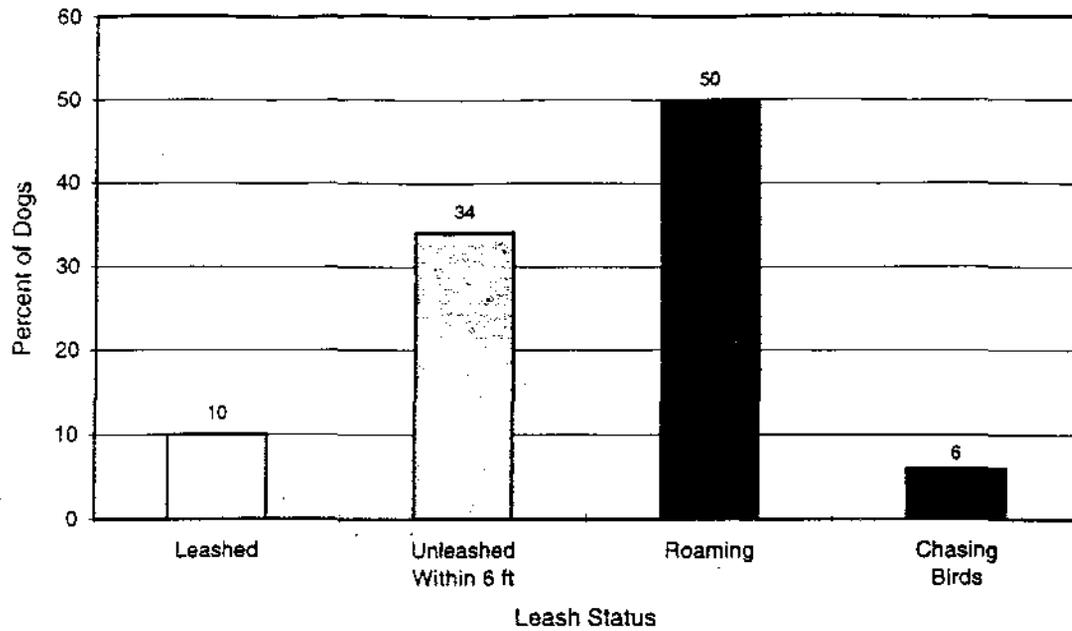
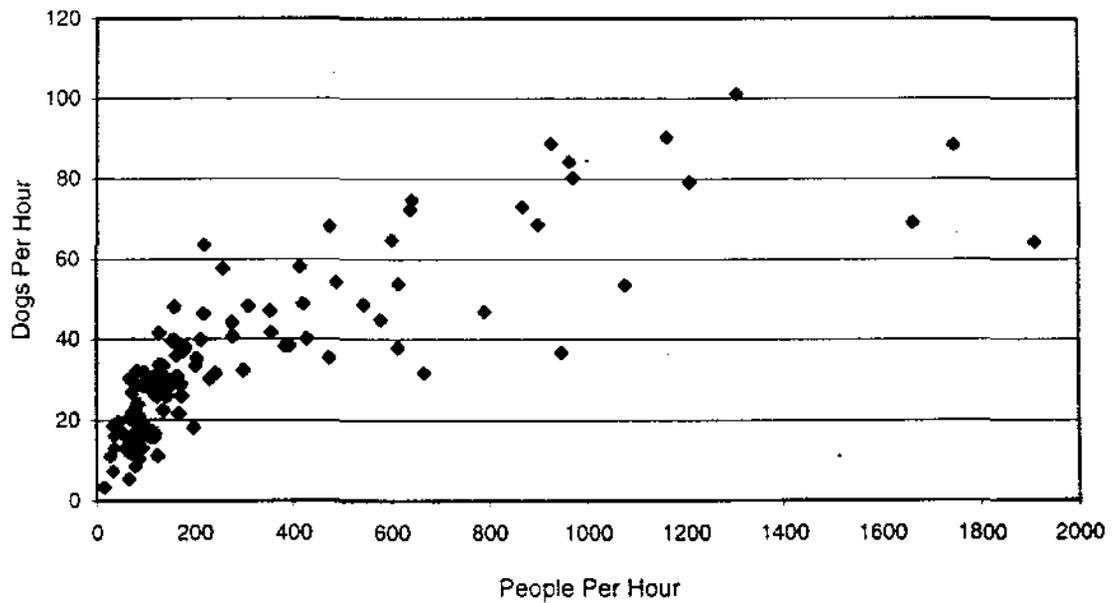


Figure 14. Number of Dogs versus Number of People, Ocean Beach, San Francisco, December 1994 through May 1996, Golden Gate National Recreation Area ( $N=111$ )



## A PARTIAL LISTING OF FEDERAL LAWS HAVING AN INFLUENCE ON WILDLIFE

Wendell G. Swank

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Name of the law is followed by Title number, United States Code, and section within that title. [two pages in length]

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1. Administrative Procedures Act. 5 U S C 551-576
2. Anadromous Fish Conservation Act. 16 U S C 755-7601
3. Animal Welfare Act. 7 U S C 2131-2155
4. Bald and Golden Eagle Act. 16 U S C 668-668d
5. Budget Act of 1974. 31 U S C 1301-1353
6. Classification and Multiple Use Act. 43 U S C 1411-1418
7. Clean Water Act. 33 U S C 1251-1376
8. Coastal Zone Management Act. 16 U S C 1451-1464
9. Comprehensive Environmental Response, Compensation and Liability Act. 42 U S C 9601-9657
10. Cooperative Wildlife Program (with states) on Public Lands. 16 U S C 670g-670o
11. Endangered Species Act. 16 U S C 1531-1542
12. Environmental Pesticide Control Act. 7 U S C 136-136y
13. Federal Aid in Fish Restoration (Dingell-Johnson) Act. 16 U S C 777-777k
14. Federal Aid in Wildlife Restoration (Pittman-Robertson) Act. 16 U S C 669-669i
15. Federal Land Policy and Management Act. 43 U S C 1701-1782
16. Fish and Wildlife Coordination Act. 16 U S C 661-667
17. Fish and Wildlife Conservation (Non-Game) Act. 16 U S C 2901-2911
18. Fish and Wildlife Service (Agency) Act. 16 U S C 742a-757
19. Fishery Conservation and Management (200 Mile Limit) Act. 16 U S C 1801-1861
20. Forest and Rangeland Renewable Resources Planning Act. 16 U S C 1600-1687
21. Forest Service Organic Administrative Act. 16 U S C 475
22. Intervention On The High Seas (Oil Pollution) Act. 33 U S C 1471-1487
23. Lacey Act. 16 U S C 3371-3378
24. Land and Water Conservation Fund Act. 16 U S C 460 1-4 - 460 1-11
25. Marine Mammal Protection Act. 16 U S C 1361-1362, 1371-1384
26. Marine Protection (Ocean Dumping) Act. 33 U S C 1401-1444
27. Migratory Bird Treaty Act. 16 U S C 701-718
28. Multiple Use Sustained Yield Act. 16 U S C 528-531
29. National Aquaculture Policy, Planning and Development Act. 16 U S C 2801-2840
30. National Environmental Policy Act. 42 U S C 4321-4370a
31. National Park Service Act. 16 U S C 1
32. National Wildlife Refuge System Administration Act. 16 U S C 666 dd-666 jj

33. Rivers and Harbors Act. 33 U S C 401-403
34. Salmon and Steelhead Conservation Act. 16 U S C 3301-3345
35. Submerged Lands Act. 43 U S C 1301-1343
36. Surface Mine Control and Reclamation Act. 30 U S C 1201-1303
37. Taylor Grazing Act. 43 U S C 315-315 g, 315 h-315 n
38. Whaling Convention Act. 16 U S C 916-916 l
39. Wild and Scenic Rivers Act. 16 U S C 1271-1287
40. Wilderness Act. 16 U S C 1131-1136
41. Wild Free-Roaming Horses and Burros Act. 16 U S C 1331-1340

**Potential Questions from the RD re GGNRA Dog Mgmt. Plan/EIS  
(not necessarily covered by the briefing)**

1. National parks and use consistent with other national parks
  - a. ROLAs are a few areas, with stringent guidelines as well as adaptive management
  - b. Sensitive areas were taken off the table
2. Consistency with the Federal Panel report
  - a. Central question in the report is whether off-leash dogwalking can be allowed without causing unacceptable impacts. The GGNRA enabling legislation is broad enough to allow the use, but impacts must be limited. This plan seeks to do that.
  - b. Many of the fed panel recommendations on mitigation have been adopted, including:
    - i. education
    - ii. separating off-leash from other uses
    - iii. keeping off-leash use away from dangerous areas, such as cliffs
    - iv. keeping off-leash away from areas with high habitat value
    - v. keeping off-leash away from areas where there is likely to be public safety incidents
3. Rationale behind the areas we considered – and how we came up with the parameters.
4. Dog management in future land acquisitions.
  - a. criteria ID'd in dog plan
  - b. would have to be consistent with GMP zones
5. How does economics play a role?
  - a. socioecon considered but dismissed
  - b. cost benefit and reg-flex under rulemaking will go forward
    - i. OMB – two baselines for reg-flex
6. What is the staffing cost per alternative, and/or what is the comparative cost between alternatives? (\*\*We don't have this info yet...).

## **Project History:**

- The NPS pet regulation (36 CFR §2.15) requires dogs to be restricted by cage or leash.
- In 1979, responding to public input, GGNRA Citizen's Advisory Commission recommended a Pet Policy that would allow off-leash dog walking in specific areas in Marin and San Francisco – a policy the park followed for over 20 years.
- GGNRA practices following the Citizen's Advisory Commission's Pet Policy, as well as an increase in the number of dog walkers using the park and changing expectations for use of the park, resulted in confusion, controversy, and litigation over dog management and voice control dog walking.
- In 1999, GGNRA closed a section of Ft. Funston for habitat restoration, safety and protection of geologic resources, resulting in a lawsuit by organized dog walking groups over lack of public notice and comment prior to the closure. Events surrounding the lawsuit highlighted the 1979 Pet Policy followed by the park, which was not in compliance with NPS pet regulations.
- In 2000, the Federal District Court disallowed the Funston closure until such time as the NPS provided an appropriate public notice and opportunity for comment on the closure. The park completed a notice and comment period in 2000, allowing closure of the section of Ft. Funston.
- Following the 2000 Fort Funston court decision, it became evident that a comprehensive approach to dog management in GGNRA was needed.
- In January 2001, the GGNRA Advisory Commission acknowledged publicly that their 1979 "voice control" policy was not in compliance with the NPS pet regulation (36 CFR§ 2.15) and was therefore null and void .
- In January 2002, an Advanced Notice of Proposed Rulemaking (ANPR) for dog management in GGNRA was released asking for public comment on whether the park should enforce the NPS pet regulation requiring that dogs be on leash, or identify specific locations/ways to address off leash use within the park. 8,580 comments were received; the majority were in favor of off leash use.
- In 2002, following the release of the ANPR, GGNRA began to emphasize education and enforcement of the NPS pet regulation; however, the regulation was routinely ignored by many park visitors. Park staff were overextended attempting to enforce the NPS regulation, ensure visitor (and dog) safety, maintain areas heavily used by dogs, and prevent resource damage.
- A 2005 decision by the U.S. District Court for the Northern District of California affirmed a dismissal of three citations for violations of the NPS leash regulation in an area opened to off-leash dog walking in the 1979 Pet Policy. The decision noted that the 1979 policy had been in for many years, and that prior to enforcing the NPS-wide leash regulation GGNRA was required by 36 CFR §1.5(b) to conduct a formal public notice and comment rulemaking.
- In 2004, GGNRA initiated a dog management planning process by establishing a Negotiated Rulemaking Committee pursuant to the Negotiated Rulemaking Act and initiating work on an Environmental Impact Statement pursuant to the National Environmental Policy Act.
- The Committee met over a period of almost two years ending in October 2007 but did not reach consensus on a proposed special regulation, due to differing positions on the impacts of dog walking on resources and other visitors. They did reach consensus on elements of a special regulation: guiding principles for dog management; guidelines for commercial dog walking; and site-specific treatment for one area under consideration by the Committee. Those consensus agreements were incorporated into three of the six alternatives in the draft Plan/DEIS.

## **GGNRA DOG MANAGEMENT PLAN**

### **Regulated Off-Leash Areas (ROLAs) Guidelines**

- Dog walkers may walk dogs off leash only within designated ROLAs.
- Each off leash dog must be under voice and sight control at all times. Dogs are considered under control when they are within direct eyesight of the owner/guardian/handler and when they have the ability to immediately return to their owner/guardian/handler.
- Dogwalkers must be able to recall their dog promptly, and shall demonstrate this ability when requested by Law Enforcement personnel.
- Any uncontrolled dog or dog that poses a threat to public safety is prohibited. Dogs are presumed to NOT be under control if they:
  - annoy, harass, or attack people, livestock, or other leashed or unleashed dogs,
  - intentionally or unintentionally annoy, pursue, hunt, harass, harm, wound, chase, attack, capture, or kill wildlife,
  - enter leash-required or dog-prohibited areas, and/or
  - dig, destroy vegetation, or enter fenced or closed areas.
- Dog owners must license their dogs in compliance with their county's animal ordinance.
- All dog walkers must have a leash for each dog under their care.
- Dogwalkers must keep dogs on leash in parking lots and short distance beyond as identified in the plan.
- Dogwalkers using a ROLA must keep their unleashed pets within the ROLA boundaries and out of any area closed by fence or sign for restoration, habitat protection or safety concerns that may occur within a ROLA.
- Dog walkers must pick up their dogs' feces immediately and dispose of them in a garbage container.
- ROLA areas will be adaptively managed, as identified in the plan. Subject to monitoring, an area can be changed from ROLA to on-leash or no dogs if compliance is not achieved.

## GOGA Dog Management Plan/EIS - Purpose, Need, and Objectives

### Purpose of Taking Action

The purpose of the plan is to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park. This plan would promote the following objectives:

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

### Need for Action

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

### Plan Objectives

- 1. Visitor Experience and Safety:** Minimize conflicts related to dog use by providing a variety of safe, high quality visitor use experiences, including areas where dogs are allowed. This objective considers visitors with dogs and visitors without dogs.
- 2. Law Enforcement and Compliance:** Maximize dog walker compliance with clear, enforceable parameters in order to improve park operations and use of staff resources in managing dog walking.
- 3. Park Operations:** (a) Provide adaptability and flexibility so that information gathered from monitoring can be used in future decision making based on estimated outcomes, including new park areas. (b) Ensure a safe and healthy working environment for park staff. (c) Evaluate commercial dog walking, and if allowed, create and implement an enforceable policy.
- 4. Natural Resources:** (a) Protect native wildlife and their habitat (including sensitive species and their habitat, and federally or state-listed, unique, or rare species) from detrimental effects of dog use, harassment or disturbance by dogs. (b) Minimize degradation of soil and water resources by dog use. (c) Preserve opportunities for future natural resource restoration and enhancement.
- 5. Cultural Resources:** (a) Preserve opportunities for future cultural resource restoration and enhancement. (b) Protect cultural resources from the detrimental effects of dog use.
- 6. Education and Community Support:** (a) Build community support for the plan to maximize management of dog walking use. (b) Increase public understanding of NPS policies.

**PWR PROJECT REVIEW BRIEFING**  
**January 21, 2010**

**Overview of EIS**

- Proposal for change in GOGA dog management – to assess options for some areas of voice and sight control dog walking
- Range of action alts – 2.15/Multiple Use – Balanced by County/Most Protective/Most Dog Walking Access – Most Management Intensive
- 22 areas analyzed/8 in Marin/9 in SF/5 in San Mateo
- GOGA manages 14,000 acres
- Area open to all dog walking
  - Alt A = 4.9%
  - Alt B = 1.6%
  - Alt C = 1.8%
  - Alt D = 1.3%
  - Alt E = 2.4%
- Voice Control per Alt
  - Alt A – 4%
  - Alt B – 0
  - Alt C - .78%
  - Alt D - .12%
  - Alt E - .84%

**Schedule**

- Internal drafts
  - 1<sup>st</sup> to park end of Jan
  - CBA for preferred March
  - 2<sup>nd</sup> to park in April

*(should Allen Schmierer be involved in review of internal drafts?)*
- Submit BA and CZMA consistency determination in July
- Release of public draft – late summer to fall – 90 day comment period
- Outreach to public/media during public comment period
- Notice of Proposed Rulemaking published after comments
- FEIS and final Notice of Rulemaking late 2011



<b>Park:</b>	Golden Gate Nat'l Recreation Area
<b>Project Title:</b>	Dog Management Plan EIS
<b>PMIS #:</b>	91339
<b>Fund Source(s):</b>	Env. Quality Division, Env. Impact Statements (GOGA funds park staff and public outreach)
<b>Formulation Year:</b>	2004, 2005, 2006, 2007, 2008
<b>Funded Amount:</b>	\$1,112,821.00
<b>Prepared By (Name/Title)</b>	Shirwin Smith, Management Assistant

**PROJECT UPDATE:**

**SCOPE:** This project will develop an EIS for a new dog walking regulation for GGNRA. The EIS will assess 4 action alternatives for 21 areas of the park. These areas were also the subject of the negotiated rulemaking process conducted by GGNRA that concluded in 2007.

**COMPLIANCE: EIS**

**BUDGET:** \$1,500,000 to complete the draft EIS and review comments; the related rulemaking would be completed by agency staff.

**SCHEDULE:** Michael Edwards, project manager from EQD is overseeing the development of the EIS by a contractor. The initial drafts of chapters 1-4 have been reviewed by the park; the first internal draft EIS is due to the park by late January, 2010. The preferred alternative will be selected using the CBA process in March, 2010. The second (final) internal draft is due to the park in April 2010 with comments due by June 2010. The public draft EIS could be released as early as July 2010, with a 90-day comment period, during which the park would also hold public meetings and media interviews. Release of the public draft EIS could be delayed pending approval of the notice of availability in WASO. Another possible delay could result if the notice of proposed rulemaking is released for public comment at the same time, since it also requires WASO review and approval.

**OTHER:** A related schedule item is a final decision on when to issue the draft rule. Initial planning had anticipated releasing the draft rule at the same time as the public draft EIS. An alternative being considered is releasing the draft rule after public comments on the draft EIS have been reviewed.

**PWR DIRECTORATE**

**( X ) INFORMATIONAL ( ) DECISION(S)/APPROVAL(S) REQUESTED**

## **Dog Management Range of Alternatives Briefing for Jon Jarvis July 11, 2008**

### **Geographic site selection**

- Sites included in alternatives are drawn from the parameters developed for the negotiated rulemaking process
- When we developed those parameters, guided by criteria from the Federal panel recommendation, we eliminated from consideration any geographic areas with public safety concerns, sensitive natural resources, important cultural resources and conflicting visitor uses.
- Result –only 22 locations - just under 1,300 acres - were even considered for dogwalking -7 locations in Marin; 10 locations in San Francisco and 5 locations in San Mateo
- As the alternatives were developed, input from park staff on resources and current visitor uses and info from the discussions of the neg. rule. committee helped to identify appropriate locations for dogwalking.
- The resulting range of alternatives constrains dogwalking largely to developed sites- within manipulated landscapes where possible – and the perimeters of large areas of contiguous habitat.
- We also used a county-by-county focus – to allow us to best evaluate what should be the appropriate extent of this use within each county.
- Beaches – particularly off leash use of beaches - were an important consideration particularly in Marin and San Francisco. The county-by-county approach was particularly helpful in balancing beach access.

### **County Map Overview:**

- Common to all alternatives:
  - dogwalking only allowed in areas designated as on leash or regulated off leash area
  - no off trail dogwalking
  - no dogs in campgrounds
  - on leash in parking lots and picnic areas
- All alternatives leave the majority of the park closed to dogwalking.
- Of the dogwalking use proposed, majority is on-leash
- The greatest amount of off-leash use proposed in an alternative – 117 acres - less than 1% of the total area GOGA manages.

- San Mateo – with the largest amount of relatively undisturbed, contiguous habitat – with much on-going restoration – does not have any off leash use proposed.
- Off-leash use occurs only within areas designated as Regulated Off Leash Areas (ROLAs) – a definition that came out of intensive discussion by the neg. rule. Committee. That is to signify that off-leash use requires adherence to specific behavioral guidelines.
  - **ROLA guidelines** were initially discussed in the negotiated rulemaking process; we have further refined them for the DEIS.
  - Critical elements:
    - Clear definition of what “voice and sight control”
    - Clear definition of “uncontrolled” behavior
  - This would be a significant change, since currently we have little legal control over off-leash dogwalking behavior.

*Any map or site specific questions?*

**Overview of off-leash area statistics chart – most controversial element**

- Of total GOGA managed lands:
  - now open to off leash: 3.9%
  - Action alternatives would allow regulated off leash use in less than 1% of GOGA lands
- Of GOGA Marin county lands:
  - Now open to off leash: 2%
  - Action alternatives would allow regulated off leash use in no more than .1% of Marin lands
- Of GOGA San Francisco lands:
  - Now open to off leash: 36%
  - Action alternatives would allow regulated off leash use in from 2% to 11% of San Francisco lands

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## DRAFT MEMORANDUM

To: GGNRA Dog Management Negotiated Rulemaking Staff Team

From: Facilitation Team

Subject: Project Completion Steps

Date: June 22, 2007

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This memo is intended to help clarify and serve as the basis for discussion about the steps needed to move from the current status of the project through completion of the Negotiated Rulemaking Committee's work. These steps include:

- 1) Work with the FTIC and proposals from Subcommittee members to clarify areas of agreement, or the foundations of agreement, and identify where significant differences remain
- 2) Use the June 28 Subcommittee meeting to clarify areas of agreement, and outstanding issues, associated with:
  - General Conditions for Dog Management (called Conditions in the FTIC)
  - ROLA Characteristics
  - Site-Specific Recommendations

The Subcommittee will develop its recommendation for the full Committee and this will be presented in the Meeting Summary

- 3) Committee meeting [date TBD in July or August] to act on Subcommittee recommendations. The outcomes will be documented in the Meeting Summary.
- 4) FT summarizes Committee outcomes in a preliminary report to GGNRA. This report would identify:
  - Areas of agreement on General Conditions for Dog Management
  - Areas of agreement on ROLA Characteristics
  - Areas of agreement on Site Specific Recommendations
  - General Conditions for which agreement does not exist, and a summary of the range of views
  - ROLA Characteristics for which agreement does not exist, and a summary of the range of views
  - Elements of the Site Specific Recommendations for which agreement does not exist, and a summary of range of views

- 5) Areas of agreement from Committee will be explicitly incorporated into the NEPA Analysis of Alternatives
- 6) The NEPA analysis may incorporate other proposals or concepts not agreed upon by the Committee but considered within the reasonable range of alternatives by GGNRA
- 7) The NR Committee, nor its Subcommittee, will not meet during the time the NEPA Alternatives Evaluation is being conducted; “ad hoc” efforts among Committee members to develop support for various possible outcomes may continue on an informal basis
- 8) Once the Impact Analysis is complete, the NR Committee will reconvene to assess the outcomes from the evaluation. Based on the outcomes from the impact analysis this could lead to: [*the issue of sequencing needs to be clarified – will this occur after the Alternatives Evaluation is completed but before the Draft EIS is written, or after the Draft EIS is written*]
  - Confirming agreements on General Conditions, ROLA Characteristics and/or Site Specific Recommendations on which agreements were reached prior to the NEPA analysis
  - Revising the agreements reached prior to the NEPA analysis
  - Withdrawing support for agreements reached prior to the NEPA analysis
  - Developing new areas of agreement
- 9) Agreements need to be translated into rule language by GGNRA/DOI; while this is occurring, key points of disagreement will be documented, along with the associated range of views
- 10) Following the development of rule language, the NR Committee will meet to ensure the draft rule language reflects their understanding of agreements reached
- 11) Once the NR Committee has completed its deliberations, a final Committee report will be developed by the facilitation team which documents the process and outcomes; at this point, individual or group proposals from NR Committee members can be submitted as part of the final report; this step should be completed before the FEIS so that any revisions desired by GGNRA can be included in the NEPA process. *See NR Committee Protocol 4c.*

**Reg-Neg/NEPA Integrated Processes  
For Dog Management At Golden Gate National Recreation Area  
DRAFT**

January 22, 2004

	<b>Reg-Neg Process Tasks</b>	<b>Estimated Timeline</b>	<b>NEPA Process Tasks</b>	<b>Estimated Timeline</b>	<b>Who does task</b>
<b>1.</b>	3rd Party Neutral Selection Process <ul style="list-style-type: none"> <li>• Task Order</li> <li>• RFQ</li> <li>• Interviews</li> <li>• Selection</li> </ul>	January 2004 to March 2004	Park initiates internal <i>preliminary</i> data gap analyses	January to March 2004	SOW for Institute completed by NPS (Institute has forwarded Task Order for NPS signature)
<b>2.</b>			SOW and NEPA contractor selection – optimal to have on board when Reg-Neg contractor in place	February to April 2004	NPS NEPA contractor <ul style="list-style-type: none"> <li>• EQD can assist park with NEPA contract if needed</li> <li>• Contractor can assist with data gap analyses if needed</li> </ul>
<b>3.</b>	Prelim Reg-Neg Process Discussion and Orientation Meeting	Late March-early April 2004	DO-12 overview to help establish purpose/need and objectives/impact topics of Reg-Neg/EIS - could be facilitated by the NEPA contractor  Review <i>preliminary</i> data gap analyses based on impact topics.	April 2004	Institute Reg-Neg contractor/neutral NPS NEPA contractor
<b>4.</b>	Stakeholder interview process by neutral begins	May/June 2004	Internal scoping begins in preparation for data gathering – with assist from NEPA contractor?	May 2004 through Fall 2004	Reg-Neg contractor/neutral NPS staff NEPA contractor
<b>5.</b>	Issue final Assessment Report	July 2004			Reg-Neg contractor/neutral
<b>6.</b>	Assume Decision is to proceed with Reg-Neg; Publish Fed. Reg. Notice to establish Reg-Neg (FACA) Committee	August 2004	↓		NPS Reg-Neg contractor/neutral

**Reg-Neg/NEPA Integrated Processes  
For Dog Management At Golden Gate National Recreation Area  
DRAFT**

**January 22, 2004**

<b>7.</b>	↓		Fed. Reg. Notice of Intent (NOI) for NEPA process – includes acknowledgement that Reg-Neg is proceeding integrated with NEPA process.	August 2004	NPS staff NEPA contractor
<b>8.</b>	Reg-Neg Committee established. NPS presentation to Reg-Neg Committee on Purpose and Need and Info. Gap Analysis	March 2005			Reg-Neg contractor/neutral NPS staff NEPA contractor
<b>9.</b>	Reg-Neg Committee meetings held.	March - September 2005			Reg-Neg contractor/neutral NPS staff
<b>10.</b>	Reg-Neg committee attends public scoping		Public Scoping (requesting comments in 30 days for max. consideration in process) begins to get input on purpose, need and objectives of plan and to explain how Reg-Neg integrates with NEPA process.	March 2005	NEPA contractor NEPA IDT Reg-Neg contractor Reg-Neg committee
<b>11.</b>	Reg-Neg committee reviews report.	May 2005	NEPA contractor prepares content analyses report of public scoping comments. NEPA IDT reviews report.	May 2005	NEPA contractor NEPA IDT Reg-Neg contractor Reg-Neg committee

**Reg-Neg/NEPA Integrated Processes  
For Dog Management At Golden Gate National Recreation Area  
DRAFT**

**January 22, 2004**

<b>12.</b>	Further work with Reg-Neg Committee to discuss impact analysis process, present agency requirements and develop a preliminary range of alternatives for initial analysis.		NEPA contractor, NEPA IDT meet with Reg-Neg Committee to discuss potential range of alternatives for the EIS.  Information gained in Reg-Neg meetings as well as public scoping comments would be considered in developing the range of reasonable alternatives	May 2005	Reg-Neg contractor Reg-Neg committee NEPA contractor NEPA IDT NPS
<b>13.</b>	↓		NEPA contractor formalizes proposed alternatives by Reg-Neg Committee and NEPA IDT for NEPA analysis.	June 2005	NEPA contractor NEPA IDT
<b>14.</b>	↓		Analysis (internal NPS) of alternatives developed.	TBD	NPS NEPA contractor
<b>15.</b>	Reg-Neg Committee to review/discuss IDEIS		NEPA contractor prepares internal Draft EIS/distributes for review	TBD	Reg-Neg Committee Reg-Neg contractor NEPA contractor NEPA IDT NPS
<b>16.</b>	Reg-Neg Committee negotiates interim agreement on a preferred alternative (preferred solution) taking into consideration the IDEIS impact analyses.	TBD	Preferred alternative to NEPA contractor for analysis.  NEPA contractor prepares DEIS, with preferred alternative (which also represents the Reg-Neg committee's interim consensus).	TBD	NEPA contractor Reg-Neg Committee Reg-Neg contractor NEPA IDT
<b>17.</b>	Reg-Neg Committee is present at any public comment meetings	TBD	DEIS out for public review – 60 days	TBD	Reg-Neg Committee Reg-Neg contractor NEPA contractor NEPA IDT

**Reg-Neg/NEPA Integrated Processes  
For Dog Management At Golden Gate National Recreation Area  
DRAFT**

**January 22, 2004**

<b>18.</b>	Reg-Neg Committee and NEPA IDT/contractors meet to discuss public comments and any remaining issues to be resolved.	TBD	Public comment closes; NEPA contractor prepares summary of public comments.	TBD	Reg-Neg Committee Reg-Neg contractor NEPA contractor NEPA IDT
<b>19.</b>	Reg-Neg Committee continues to refine preferred alternative	TBD		TBD	Reg-Neg Committee Reg-Neg contractor
<b>20.</b>	Reg-Neg Committee negotiates agreement on recommendation for final preferred alternative.	TBD	NEPA contractor/IDT prepare final EIS, which also represents reg-neg committee consensus	TBD	Reg-Neg Committee Reg-Neg contractor NEPA contractor NEPA IDT
<b>21.</b>	Reg-Neg Committee reviews Final EIS	TBD	FEIS out for 30 days		Reg-Neg Committee Reg-Neg contractor
<b>22.</b>	Have Reg-Neg Committee available to meet after FEIS comment period in case of substantive comments/changes needed.	TBD			Reg-Neg Committee Reg-Neg contractor
<b>23.</b>			ROD	TBD	
<b>24.</b>	Final Rule published	TBD			

**Key:**

- EQD – Environmental Quality Division
- IDEIS - Internal draft environmental impact statement
- IDT – Interdisciplinary Team (specialists with knowledge of important features of NEPA analysis)
- ROD - Record of Decision
- SOW – Scope of work
- TBD - To be determined



**Agenda  
Regional Director Briefing  
Dog Management Plan and  
Environmental Impact Statement  
Golden Gate National Recreation Area (GGNRA)  
July 11, 2008  
9am Pacific Time**

Attendees:

*GGNRA:* Brian O'Neill, Superintendent; Mai-Liis Bartling, Deputy Superintendent; Chris Powell, Public Affairs Specialist, Shirwin Smith, Management Assistant.

*Pacific West Region:* Jon Jarvis, Regional Director

*Solicitor's Office:* Barbara Goodyear, Field Solicitor

*WASO, NRPC-EQD:* Michael B. Edwards, Environmental Protection Specialist

- |   |              |
|---|--------------|
| 1. Welcome and Introductions (Brian O'Neill, Superintendent)                                | 9:00-9:15 am |
| 2. Background and overview (Chris Powell)   | 9:15-9:30    |
| • 1979 Pet Policy, ANPR, Federal Panel report, lawsuits, , Negotiated Rulemaking , Plan/EIS |              |
| 3. Schedule (Michael Edwards)   | 9:30-9:35    |
| 4. Dog Management Plan/EIS  | 9:35-10:20   |
| • Themes of Action Alternatives (Michael Edwards)   |              |
| • Overview of Alternatives by county (Shirwin Smith)  |              |
| • Other alternative elements (Michael Edwards)  |              |
| ○ Commercial dogwalking   |              |
| ○ Education/Enforcement   |              |
| ○ ROLA definition and certification program   |              |
| ○ Adaptive Management   |              |
| 5. Special regulation (Barbara Goodyear)  | 10:20-10:30  |
| <b>--- ADJOURN ---</b>  | 10:30        |

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
~~July 25, 2006~~ August 7, 2006

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
<p><b><u>February 17, 2006</u></b>            Notice of Establishment for Committee and Notice of Committee Meeting published in Federal Register; Members appointed</p>	<p><b><u>February 22, 2006</u></b>            EIS Notice of Intent published in Federal Register; Starts 60 day scoping (ends April 2006). Contractor begins analyses of no action alternative (existing management continued)</p>
<p><b><u>March 6, 2006</u></b>            NR Committee Meeting #1: Introductions of DFO/Committee, Facilitator Evaluation, Protocols, Applicable Statutes/Regulations, NEPA Process/Schedule, NPS Sideboards, Public comment.</p>	<p><b><u>March 2006</u></b>            Information collection by NEPA Interdisciplinary Team (IDT)</p>
<p><b><u>April 4 and 5, 2006</u></b>            Committee attends NEPA Public Scoping workshops.             Committee provides comments to NPS-NEPA public scoping (comment period ends 4/24).</p>	<p><b><u>April 4 and 5, 2006</u></b>            Public scoping workshops</p>
<p><b><u>April 18, 2006</u></b>            NR Committee Meeting #2: Information Updates [Accelerated Resource Protection Rulemaking], Revise Draft Protocols, Committee Schedule/Logistics, Public comment.</p>	<p><b><u>April:</u></b> Analysis of Public Scoping Comments             Development of No Action Alternative; impact thresholds; drafting of Affected Environment</p>
<p><b><u>May 15, 2006</u></b>            NR Committee Meeting #3: Final Protocol revisions approval,</p>	<p><b><u>May:</u></b> Analysis of Public Scoping Comments continues</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**

~~July 25, 2006~~ August 7, 2006

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
NPS Parameters and Scope (Sideboards) and NEPA EIS No Action Alternative, Draft Collaborative Approach to Decision Making, Information Needs (including creation of a Technical Subcommittee and initial charge), Public comment.	Development of No Action Alternative; impact thresholds; drafting of Affected Environment  Preliminary data collection in response to Committee Meeting #3 information needs.
<b>July 18:</b> Technical Subcommittee Meeting #1: Identify essential data, review available data/data by geographic areas gathered by NEPA IDT and identify data gaps, discuss recommendation for Committee. Next steps to prepare for Committee mtg.  (Possible Committee field trip/s or individual visits to dog walking locations with GGNRA)	<b>June-July:</b>  Data collection continues; IDT review of No Action Alternative; preliminary draft Affected Environment; draft impact thresholds.  Presentation to Technical Subcommittee re data.  Public Scoping Content Analysis complete.
<b>July 31:</b> NR Committee Meeting #4: Review data needs recommendation from Technical Subcommittee Meeting #1 and decide next steps, Review initial Key Interests and Issues Table, Review Public Scoping Content Analysis, NEPA IDT Data Needs/Questions for Committee Members; Public Comment.  Options: USFWS presentation on T/E species consultation process. NEPA IDT Preliminary Draft Criteria.	<b>End of July</b> NEPA IDT comments on No Action Alternative, impact thresholds, and draft Affected Environment consolidated and to NEPA contractor.  <del>NEPA IDT: Review preliminary Draft Criteria. (Proposed meeting or conference call)</del>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
July 25, 2006 August 7, 2006

Negotiated Rulemaking (NR) Advisory Committee Process	NEPA Process
<p><u>Mid August – Committee provides feedback on current conditions to NEPA contractor</u></p> <p><u>August/September (?)</u></p> <p>Technical Subcommittee Meeting #2: Further discussion of data needs next steps based on NR Committee Mtg#4. Include assessment of NEPA database for the various locations discussed during Committee #4.</p> <p>Option: Caucuses refine Key Interests and Issues Table.</p> <p>Option: Develop initial options for GGNRA wide issues such as criteria for voice control, commercial dogwalking.</p>	<p><u>August 2006</u>  <u>August 1, 2006:</u> NEPA Agency Scoping <u>and informal meeting with USFWS.</u></p> <p><u>NEPA IDT initiates informal consultation with USFWS.</u></p> <p><u>EQD/TQNEPA prepares preliminary draft Criteria for park review.</u></p> <p><u>August/September 2006</u></p> <p><u>NEPA IDT initiates informal consultation with USFWS.</u></p> <p><u>Final No Action Alternative and Affected Environment prepared by NEPA contractor.</u></p> <p><u>Impact Thresholds revised. Analysis of No Action Alternative begins.</u></p> <p><u>Attributes (based upon NEPA data base) of each site reviewed by NEPA IDT and preliminary alternatives developed using systematic approach. (Proposed meeting in August or Sept?)</u></p> <p><u>(Note: Attributes and NR committee’s “criteria” should be shared information)</u></p>
<p><u>Early September</u></p> <p><u>Technical Subcommittee Meeting #2: Further discussion of data needs next steps based on NR Committee Mtg#4. Include</u></p>	<p><u>September 2006</u></p> <p><u>NEPA IDT:</u>  <u>Review preliminary draft Criteria. (Proposed conference call)</u></p>

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**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**July 25, 2006 August 7, 2006**

Negotiated Rulemaking (NR) Advisory Committee Process	NEPA Process
<p><u>assessment of NEPA database for the various locations discussed during Committee #4. Discuss options for Joint Fact Finding.</u></p> <p><u>Option: Caucuses refine Key Interests and Issues Table.</u></p> <p><u>Option: Develop initial options for GGNRA-wide issues such as criteria for voice control, commercial dogwalking.</u></p>	<p><u>Review attributes (based upon NEPA data base) of each site and develop preliminary alternatives using systematic approach. (Proposed meeting?)</u>  <u>(Note: Attributes and NR committee's "criteria" should be shared information)</u></p> <p><u>NEPA CONTRACTOR:</u>  <u>Final No Action Alternative and Affected Environment prepared</u></p> <p><u>Impact Thresholds revised. Analysis of No Action Alternative begins.</u></p> <p><u>End of September: Draft Impacts of No Action Alternative prepared</u></p>
<p><b><u>September 21, 2006</u></b></p> <p>NR Committee Meeting #5: Discuss outcomes of Technical Subcommittee Meeting #2; <u>NEPA presentation of summary of public scoping comments</u>; Review revisions to Key Interests and Issues Table; <u>Review initial options for individual sites and jointly evaluate; review initial options for GGNRA wide issues and jointly evaluate</u>; Agree on next steps.</p> <p>Option: NEPA IDT <del>could</del> presents its approach to developing preliminary <del>alternatives and those alternatives criteria for development of alternatives</del> to the NR committee. <del>In other ADR/NEPA processes, the NEPA IDT has presented preliminary alternatives as a starting point for NR deliberations.</del></p>	<p><b><u>September 21, 2006</u></b></p> <p><u>Final draft criteria prepared and presented to committee. NEPA IDT Revises Preliminary Alternatives. (Proposed meeting in September)</u></p> <p><del><b><u>End of September:</u></b></del> <del>Draft Impacts of No Action Alternative prepared by contractor.</del></p>

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**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
July 25, 2006 August 7, 2006

Negotiated Rulemaking (NR) Advisory Committee Process	NEPA Process
Caucus efforts: TBD	
<p><b><u>Mid-October 2006?</u></b>  <del>NR Technical Subcommittee Meeting #3 in day-long workshop format:</del> Focus on GGNRA area-specific dog management options, discuss area-specific issues and consider draft consensus language. <del>Review draft consensus language pertaining to GGNRA-wide dog management options.</del></p> <p><del>Note: This is where NEPA and NR must intersect. An option (used in other ADR/NEPA processes according to IECR) is for the NR committee to draft its "option(s) for each site and for NEPA IDT to do a preliminary impact analysis on those options and provide some feedback so any necessary adjustments can be considered early on.</del></p>	<p><b><u>October 2006</u></b>  <del>NEPA IDT: Proposed meeting to revise Preliminary Alternatives.</del></p> <p><del>NEPA IDT reviews Impacts of No Action.</del> Park consolidates comments for contractor.</p> <p><del>Revision of Alternatives continues.</del></p>
<p><b><u>Early-Mid November 2006 (?)</u></b>  <del>NR Committee Meeting #67: Review draft area-specific options; discuss integration of GGNRA-wide and area-specific options, and options/agreements discussed; discuss options for dealing with topics/areas where consensus has not yet been reached</del></p> <p><del>Note: Note: This is where NEPA and NR must intersect. An option (used in other ADR/NEPA processes according to IECR) is for the NR committee to draft its "option(s) for each site and for NEPA IDT to do a preliminary impact analysis on those options and provide some feedback so any necessary adjustments can be considered early on. NEPA team should be doing</del></p>	<p><b><u>November 2006</u></b>  <del>Revision of Alternatives continues.</del></p> <p>NEPA IDT presents <u>range of preliminary alternatives</u> to be analyzed in the EIS to region/WASO for concurrence.</p> <p><u>Newsletter prepared to obtain public comment on alternatives.</u> (Optional)</p> <p>(Note: NR committee should comment on NEPA alternatives throughout their development).</p>

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**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
~~July 25, 2006~~ August 7, 2006

Negotiated Rulemaking (NR) Advisory Committee Process	NEPA Process
<p><del>concurrent impact analysis for feedback and adjustments.</del> NEPA IDT will also be proceeding with impact analysis and adjustments to a full range of reasonable alternatives which may help inform NR committee as it proceeds to revise its area-specific options.</p>	
<p><del>December-January 2007?</del>            NR Committee Meeting #87: <del>Finalize-Consider draft</del> consensus <del>options for</del> areas of agreement and options for addressing topics/areas where consensus has not yet been reached.</p> <p>Note: It may be advantageous for the NR Committee to hold off finalizing consensus until NEPA analysis is complete on the actions proposed in the rule.</p>	<p><del>January 2007?December 2006</del>            Assuming NR Committee has reached consensus, the NEPA IDT <del>would include the actions in the rule as one alternative in the</del> <u>presents range of reasonable alternatives to NR committee</u> and continue to complete its impact analysis on those alternatives.</p> <p>Note: A biological assessment must also be prepared on the “proposed draft rule/NEPA preferred alternative” (prepared if likely to adversely affect, or not sure) which suggests that the NEPA IDT and NR committee (or a subcommittee) should be working concurrently to resolve T/E species concerns. NEPA contractor prepares BA for park.</p>
<p><del>January-April</del> <u>February-May 2007?</u></p> <p><u>February 2007? – Technical Subcommittee meeting #4</u></p> <p><u>March 2007? – NR Committee Meeting #8 - committee to have consensus report partially complete.</u></p> <p>At any point during this time, the NR committee could meet to revise its consensus based upon interaction with NEPA IDT.</p> <p><u>April-May 2007? – Meetings of Outreach/Educational and</u></p>	<p><u>March-April 2007?2007</u></p> <p>Preliminary <u>impact analysis</u> complete for range of alternatives. NEPA IDT reviews findings and provides comments to contractor.</p>

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**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
~~July 25, 2006~~ August 7, 2006

Negotiated Rulemaking (NR) Advisory Committee Process	NEPA Process
<u>Implementation subcommittees</u>	
<del>Late May/Early June 2007?</del> - Meeting #9	
<del>April – August</del> <u>May-September 2007?</u>	<u>April-May 2007?</u> <del>2007</del>
<u>July 2007?</u> – NR Committee Meeting #10 – to complete feedback loop and review rulemaking language	Contractor revises <u>impact analysis</u> and NEPA IDT meets to select <u>preferred alternative</u> using a method such as “Choosing by Advantage”, or Delphi Process (systematic approach to measure how well each alternative meets objectives).
Draft Rule Package prepared for DOI, SOL and OMB review (this includes OMB’s requirements for economic analysis, which will be prepared by NEPA contractor). This time period includes a series of internal reviews and revisions as needed to meet regulatory rulemaking requirements.	Contractor begins to prepare preliminary <u>draft Biological Assessment</u> on preferred alternative.
	<del>May-July</del> <u>June-August 2007?</u> <del>2007</del> Contractor prepares <u>internal draft EIS</u> for NPS review and comment.
	Consultation with USFWS continues as Draft Biological Assessment is completed by NEPA contractor.
<del>September – November</del> <u>August – October 2007?</u> <del>2007</del>	<del>A</del> <u>September – November</u> <del>August – October 2007?</del> <del>2007</del>
This is the time the NEPA IDT/contractor will be producing the DEIS for public comment. Major changes by DOI, SOL or OMB to draft rule would affect NEPA timeline if further analysis is required. OMB review can take a minimum of 90 days.	Contractor prepares <u>DEIS</u> for public review. (This time period includes a series of internal reviews and document revisions)  When DEIS is released for public review, <u>Biological Assessment is submitted to USFWS</u> requesting, if needed, their Biological Opinion. (USFWS review can take up to 90 days)
<del>November-January 2008?</del> <del>2007</del>	<del>November-December 2007</del> <u>January – March 2008?</u>

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**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**

~~July 25, 2006~~ August 7, 2006

Negotiated Rulemaking (NR) Advisory Committee Process	NEPA Process
Draft rule published in Federal Register for public comment (usually 60 day public comment period)	<u>Dog Management Plan/DEIS</u> released for public review (60 day comment period); public meetings.
<b><u>Late Early Spring 2008?</u></b> Begin preparation of final rule based upon public comment analysis (from comments received on the EIS and proposed rule—these tend to be overlapping). Option here may be to re-engage the NR committee to help resolve issues brought up during comment periods. <b>(NOTE: committee charter expires in February 2008)</b>	<b><u>Late Spring 2008?</u></b> <b><u>Early 2008</u></b> Review public comments on DEIS and proposed draft rule. Modify preferred alternative if needed to respond to public and agencies' comments.
<b><u>Mid – Late 2008</u></b> Final rule prepared for review. OMB will normally not review final rules without the NEPA decision document being signed (in this case the ROD). Final rule would also need to reflect any changes in NEPA preferred alternative and vice versa.  Final rule published in Federal Register. Implementation begins 30 days after publication.	<b><u>Mid – Late 2008</u></b> <u>Final EIS</u> prepared, including responses to public comments. This includes a series of internal reviews and contractor revisions, approvals by regional director, development of Record of Decision, etc.  ROD approved by Regional Director 30 days after FEIS made available to public.

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**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 15, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
<p><b><u>July 31:</u></b></p> <p>NR Committee Meeting #4:</p> <ul style="list-style-type: none"> <li>○ Review data needs recommendation from Technical Subcommittee Meeting #1</li> <li>○ decide next steps</li> <li>○ Review initial Key Interests and Issues Table</li> <li>○ NEPA IDT Data Needs/Questions for Committee Members</li> </ul>	<p><b><u>End of July</u></b></p> <p>NEPA IDT comments on No Action Alternative, impact thresholds, and draft Affected Environment consolidated and to NEPA contractor.</p>
<p><b><u>Mid-August 2006</u></b></p> <p>Committee provides feedback on current conditions to NEPA contractor</p> <p>Site Visits for committee members at specified Marin, San Francisco and San Mateo.</p>	<p><b><u>August 2006</u></b></p> <p><b>August 1:</b> NEPA Agency Scoping and informal meeting with USFWS.</p> <p>NEPA IDT initiates informal consultation with USFWS.</p> <p>EQD/TQNEPA prepares preliminary draft Criteria for park review.</p>
<p><b><u>September 2006</u></b></p> <p>Site Visits for committee members at specified Marin, San Francisco and San Mateo.</p> <p>Technical Subcommittee Meeting #2 (2<sup>nd</sup> wk Sept):</p>	<p><b><u>September 2006</u></b></p> <p>NEPA IDT: Review <u>preliminary draft Criteria</u>. (Proposed conference call) Develop draft systematic approach for risk factors criteria and begin research on desired future conditions.</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 15, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
<ul style="list-style-type: none"> <li>○ Presentation of NEPA data for areas open to discussion for on-leash or no dogwalking</li> <li>○ review data needs</li> <li>○ NEPA team response to data needs from Tech. subcommittee meeting #1</li> <li>○ initial presentation of definitions/explanations requested by committee</li> <li>○ EQD proposal for Joint Fact Finding.</li> </ul> <p>Option: Develop initial options for GGNRA-wide issues such as criteria for voice control, commercial dogwalking.</p>	<p>Consolidate results of NEPA no-action questions for committee.  NEPA CONTRACTOR:  <u>Final No Action Alternative and Affected Environment</u> prepared</p> <p><u>Impact Thresholds</u> revised. Analysis of No Action Alternative begins.</p> <p>End of September: <u>Draft Impacts of No Action Alternative</u> prepared</p>
<p><b><u>September 21, 2006</u></b></p> <p>NR Committee Meeting #5:</p> <ul style="list-style-type: none"> <li>○ Discuss outcomes of Technical Subcommittee Meeting #2;</li> <li>○ NEPA presentation of summary of public scoping comments (full report to be available electronically)</li> <li>○ Review revisions to Key Interests and Issues Table</li> <li>○ Presentation by DOI staff of rulemaking process</li> <li>○ NEPA presentation of preliminary criteria/risk factors for development of alternatives to the NR committee</li> <li>○ Agree on next steps.</li> </ul>	<p><b><u>September 21, 2006</u></b></p> <p><u>Final draft criteria</u> prepared and presented to committee. Results of public scoping presented to committee.</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 15, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
	<p><b><u>Early October 2006</u></b></p> <p>Review <u>Impacts of No Action</u>. Park consolidates comments for contractor prior to IDT meeting.</p>
<p><b><u>Mid-October 2006</u></b></p> <p>Technical Subcommittee Meeting #3 in day-long workshop format - specific agenda to be determined. Suggested agenda items:</p> <ul style="list-style-type: none"> <li>o focus on GGNRA area-specific dog management options</li> <li>o discuss area-specific issues and consider draft consensus language (need large scale, detailed unit maps)</li> <li>o continued clarification of definitions/explanations requested by committee</li> </ul>	<p><b><u>Mid-October 2006</u></b></p> <p>NEPA IDT: Proposed meeting to develop draft <u>desired future conditions</u> and <u>Preliminary Alternatives</u> (proposed NEPA IDT meeting)</p>
<p><b><u>Early-Mid November 2006</u></b></p> <p>NR Committee Meeting #6:</p> <ul style="list-style-type: none"> <li>o Review draft area-specific options</li> <li>o discuss integration of GGNRA-wide and area-specific options, and options/agreements discussed.</li> </ul> <p>Option: NEPA can present draft <u>desired future conditions</u> (includes criteria for restoration) and <u>Preliminary Alternatives</u> to Committee</p>	<p><b><u>November 2006</u></b></p> <p>NEPA can present draft <u>desired future conditions</u> (including criteria for restoration) and <u>Preliminary Range of Alternatives</u> to Committee</p> <p>NEPA IDT presents <u>range of preliminary alternatives</u> to be analyzed in the EIS to region/WASO for concurrence or should preliminary alternatives first go out for public comment and brief PWR in January?</p> <p><u>Newsletter</u> prepared to obtain public comment on alternatives. (Optional)</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 15, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
<p><b><u>January 2007</u></b></p> <p>NR Committee Meeting #7: Consider draft consensus options for areas of agreement and options for addressing topics/areas where consensus has not yet been reached.</p> <p>Note: It may be advantageous for the NR Committee to hold off finalizing consensus until NEPA analysis is complete on the actions proposed in the rule.</p>	<p><b><u>January 2007</u></b></p> <p>NEPA IDT presents final draft <u>range of reasonable alternatives</u> to NR committee and continues to complete its impact analysis on those alternatives.</p> <p>Note: A biological assessment must also be prepared on the “proposed draft rule/NEPA preferred alternative”. NEPA contractor prepares BA for park.</p>
<p><b><u>February-May 2007</u></b></p> <p><u>February – March 2007</u> – Meetings of Outreach/Educational and Implementation subcommittees to initiate discussion of operational/implementation needs.</p> <p><u>April 2007</u> – <u>Technical Subcommittee meeting #4</u> to review draft impact findings on consensus agreement.</p> <p><u>May 2007</u> – <u>NR Committee Meeting #8</u> – meets if adjustments needed to consensus agreement based on work Technical Subcommittee meeting #4</p>	<p><b><u>April 2007</u></b></p> <p>Preliminary <u>impact analysis</u> complete for range of alternatives. NEPA IDT reviews findings and provides comments to contractor.</p>
<p><b><u>May-September 2007</u></b></p> <p>Draft Rule Package prepared for DOI, SOL and OMB review (this includes OMB’s requirements for economic analysis, which will be prepared by NEPA contractor). This time period includes a</p>	<p><b><u>May 2007</u></b></p> <p>Contractor revises <u>impact analysis</u> and NEPA IDT meets to select <u>preferred alternative</u> using a method such as “Choosing by Advantage”, or Delphi Process (systematic approach to measure how well each</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 15, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
<p>series of internal reviews and revisions as needed to meet regulatory rulemaking requirements.</p> <p><u>September 2007</u> – <u>NR Committee Meeting #9</u> – to complete feedback loop and review rulemaking language</p>	<p>alternative meets objectives).</p> <p>Contractor begins to prepare preliminary <u>draft Biological Assessment</u> on preferred alternative.</p>
	<p><b><u>June-August 2007</u></b>            Contractor prepares <u>internal draft EIS</u> for NPS review and comment.</p> <p>Consultation with USFWS continues as Draft Biological Assessment is completed by NEPA contractor.</p>
<p><b><u>September – November 2007</u></b></p> <p>This is the time the NEPA IDT/contractor will be producing the DEIS for public comment. Major changes to draft rule by DOI, SOL or OMB would affect NEPA timeline if further analysis is required. OMB review can take a minimum of 90 days.</p>	<p><b><u>September – November 2007</u></b></p> <p>Contractor prepares <u>DEIS</u> for public review. (This time period includes a series of internal reviews and document revisions)</p> <p>When DEIS is released for public review, <u>Biological Assessment is submitted to USFWS</u> requesting, if needed, their Biological Opinion. (USFWS review can take up to 90 days)</p>
<p><b><u>January 2008</u></b></p> <p>Draft rule published in Federal Register for public comment (usually 60 day public comment period)</p>	<p><b><u>January – March 2008</u></b></p> <p><u>Dog Management Plan/DEIS</u> released for public review (60 day comment period); public meetings.</p>
<p><b><u>Late Spring 2008</u></b></p> <p>Begin preparation of final rule based upon public comment analysis (from comments received on the EIS and proposed rule—</p>	<p><b><u>Late Spring 2008</u></b></p> <p>Review public comments on DEIS and proposed draft rule. Modify preferred alternative if needed to respond to public and agencies’</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 15, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
<p>these tend to be overlapping). Option here may be to re-engage the NR committee to help resolve issues brought up during comment periods. <b>(NOTE: committee charter expires in February 2008)</b></p>	<p>comments.</p>
<p><b><u>Mid – Late 2008</u></b></p> <p>Final rule prepared for review. OMB will normally not review final rules without the NEPA decision document being signed (in this case the ROD). Final rule would also need to reflect any changes in NEPA preferred alternative and vice versa.</p> <p>Final rule published in Federal Register. Implementation begins 30 days after publication.</p>	<p><b><u>Mid – Late 2008</u></b></p> <p><u>Final EIS</u> prepared, including responses to public comments. This includes a series of internal reviews and contractor revisions, approvals by regional director, development of Record of Decision, etc.</p> <p>ROD approved by Regional Director 30 days after FEIS made available to public.</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**September 29, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
<p><b><u>July 31:</u></b></p> <p>NR Committee Meeting #4:</p> <ul style="list-style-type: none"> <li>○ Review data needs recommendation from Technical Subcommittee Meeting #1</li> <li>○ decide next steps</li> <li>○ Review initial Key Interests and Issues Table</li> <li>○ NEPA IDT Data Needs/Questions for Committee Members</li> </ul>	<p><b><u>End of July</u></b></p> <p>NEPA IDT comments on No Action Alternative, impact thresholds, and draft Affected Environment consolidated and to NEPA contractor.</p>
<p><b><u>Mid-August 2006</u></b></p> <p>Committee provides feedback on current conditions to NEPA contractor</p> <p>Site Visits for committee members at specified Marin, San Francisco and San Mateo.</p>	<p><b><u>August 2006</u></b></p> <p><b>August 1:</b> NEPA Agency Scoping and informal meeting with USFWS.</p> <p>NEPA IDT initiates informal consultation with USFWS.</p> <p>EQD/TQNEPA prepares preliminary draft Criteria for park review.</p>
<p><b><u>September 2006</u></b></p> <p>Site Visits for committee members at specified Marin, San Francisco and San Mateo.</p> <p>Technical Subcommittee Meeting #2 (2<sup>nd</sup> wk Sept):</p>	<p><b><u>September 2006</u></b></p> <p>NEPA IDT: Review <u>preliminary draft Criteria</u>. (Proposed conference call) Develop draft systematic approach for risk factors criteria and begin research on desired future conditions.</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**September 29, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
<ul style="list-style-type: none"> <li>○ Presentation of NEPA data for areas open to discussion for on-leash or no dogwalking</li> <li>○ review data needs</li> <li>○ NEPA team response to data needs from Tech. subcommittee meeting #1</li> <li>○ initial presentation of definitions/explanations requested by committee</li> <li>○ EQD proposal for Joint Fact Finding.</li> </ul> <p>Option: Develop initial options for GGNRA-wide issues such as criteria for voice control, commercial dogwalking.</p>	<p>Consolidate results of NEPA no-action questions for committee.  NEPA CONTRACTOR:  <u>Final No Action Alternative and Affected Environment</u> prepared</p> <p><u>Impact Thresholds</u> revised. Analysis of No Action Alternative begins.</p> <p>End of September: <u>Draft Impacts of No Action Alternative</u> prepared</p>
<p><b><u>September 21, 2006</u></b></p> <p>NR Committee Meeting #5:</p> <ul style="list-style-type: none"> <li>○ Discuss outcomes of Technical Subcommittee Meeting #2;</li> <li>○ NEPA presentation of summary of public scoping comments (full report to be available electronically)</li> <li>○ Review revisions to Key Interests and Issues Table</li> <li>○ Presentation by DOI staff of rulemaking process</li> <li>○ NEPA presentation of preliminary criteria/risk factors for development of alternatives to the NR committee</li> <li>○ Agree on next steps.</li> </ul>	<p><b><u>September 21, 2006</u></b></p> <p><u>Final draft criteria</u> prepared and presented to committee. Results of public scoping presented to committee.</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**September 29, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>
	<p><u><b>Early October 2006</b></u></p> <p><u>October 3-4, 2006 NEPA IDT meeting</u></p>
<p><u><b>October 26, 2006</b></u></p> <p>Technical Subcommittee Meeting #3 in day-long workshop format - specific agenda to be determined. Suggested agenda items:</p> <ul style="list-style-type: none"> <li>○ focus on GGNRA area-specific dog management options</li> <li>○ discuss area-specific issues and consider draft consensus language (need large scale, detailed unit maps)</li> <li>○ continued clarification of definitions/explanations requested by committee</li> </ul>	<p><u><b>October 2006</b></u></p> <p>Finalize criteria            Prepare Summary of Preliminary Alternatives w/Documentation            Finalize Impact Thresholds W/Park  <u><b>Complete Data Collection</b></u>            Proceed to Revise Impacts of No Action with New Data            Revise Attributes Tables for October 26, 2006 Meeting            Revise Maps as Needed to Correspond to New Data</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**September 29, 2006**

<p><b><u>November 8, 2006</u></b></p> <p>NR Committee Meeting #6:</p> <ul style="list-style-type: none"> <li>○ Review draft area-specific options</li> <li>○ discuss integration of GGNRA-wide and area-specific options, and options/agreements discussed.</li> </ul> <p>Option: NEPA can present <u>Preliminary Alternatives</u> to Committee</p>	<p><b><u>November 2006</u></b></p> <p>Consolidated Reference List Prepared  Affected Environment Revised  Revised Impacts of No Action to EQD</p> <p>Denver Team Meeting or <b>Optional Core Team Meeting at Park</b></p>
<p><b><u>December 2006</u></b></p> <p>Preparation for January reg neg meeting</p>	<p><b><u>December 2006</u></b></p> <p>EQD provides comments on Impacts of No Action Alternative  Preparation for January reg neg meeting as needed</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**September 29, 2006**

<p><b><u>January 2007</u></b></p> <p>NR Committee Meeting #7: Consider draft consensus options for areas of agreement and options for addressing topics/areas where consensus has not yet been reached.</p> <p>Note: It may be advantageous for the NR Committee to hold off finalizing consensus until NEPA analysis is complete on the actions proposed in the rule.</p>	<p><b><u>January 2007</u></b></p> <p>IDT finalizes range of reasonable alternatives for presentation to RD/WASO <i>IDT Meeting needed here??</i></p> <p>Briefing on Impacts of No Action</p> <p>Note: A biological assessment must also be prepared on the “proposed draft rule/NEPA preferred alternative”. NEPA contractor prepares BA for park.</p>
	<p><b><u>February 2007</u></b></p> <p>IDT meeting at park (Impact Analysis Workshop)</p> <p>Impact analysis begins on consensus agreement reached by reg neg.</p>
<p><b><u>February-May 2007</u></b></p> <p>February – March 2007 – Meetings of Outreach/Educational and Implementation subcommittees to initiate discussion of operational/implementation needs. (Option)</p> <p>April 2007 – Technical Subcommittee meeting #4 to review draft impact findings on consensus agreement. (Option)</p> <p>May 2007 – NR Committee Meeting #8 – meets if adjustments needed to consensus agreement based on work Technical Subcommittee meeting #4 (Option)</p>	<p><b><u>April 2007</u></b></p> <p>Internal DEIS submitted for review to NPS.</p>
<p><b><u>May-September 2007</u></b></p> <p>Draft Rule Package prepared for DOI, SOL and OMB review (this</p>	<p><b><u>May 2007</u></b></p> <p>Contractor revises Internal DEIS and NEPA IDT meets to select</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**September 29, 2006**

<p>includes OMB’s requirements for economic analysis, which will be prepared by NEPA contractor). This time period includes a series of internal reviews and revisions as needed to meet regulatory rulemaking requirements.</p> <p><u>September 2007 – NR Committee Meeting #9</u> – to complete feedback loop and review rulemaking language</p>	<p><u>preferred alternative using a method such as “Choosing by Advantage”, or Delphi Process</u> (systematic approach to measure how well each alternative meets objectives).</p> <p>Contractor begins to prepare preliminary <u>draft Biological Assessment</u> on preferred alternative.</p>
	<p><b><u>June-August 2007</u></b></p> <p>Consultation with USFWS continues as Draft Biological Assessment is completed by NEPA contractor.</p>
<p><b><u>September – November 2007</u></b></p> <p>This is the time the NEPA IDT/contractor will be producing the DEIS for public comment. Major changes to draft rule by DOI, SOL or OMB would affect NEPA timeline if further analysis is required. OMB review can take a minimum of 90 days.</p>	<p><b><u>September – November 2007</u></b></p> <p><u>Contractor prepares DEIS for public review. (This time period includes a series of internal reviews and document revisions)</u></p> <p><u>When DEIS is released for public review, Biological Assessment is submitted to USFWS requesting, if needed, their Biological Opinion. (USFWS review can take up to 90 days)</u></p>
<p><b><u>January 2008</u></b></p> <p>Draft rule published in Federal Register for public comment (usually 60 day public comment period)</p>	<p><b><u>January – March 2008</u></b></p> <p><u>Dog Management Plan/DEIS released for public review (60 day comment period); public meetings.</u></p>
<p><b><u>Late Spring 2008</u></b></p> <p>Begin preparation of final rule based upon public comment analysis (from comments received on the EIS and proposed rule—these tend to be overlapping). Option here may be to re-engage</p>	<p><b><u>Late Spring 2008</u></b></p> <p>Review public comments on DEIS and proposed draft rule. Modify preferred alternative if needed to respond to public and agencies’ comments.</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**September 29, 2006**

<p>the NR committee to help resolve issues brought up during comment periods. <b>(NOTE: committee charter expires in February 2008)</b></p>	
<p><b><u>Mid – Late 2008</u></b></p> <p>Final rule prepared for review. OMB will normally not review final rules without the NEPA decision document being signed (in this case the ROD). Final rule would also need to reflect any changes in NEPA preferred alternative and vice versa.</p> <p>Final rule published in Federal Register. Implementation begins 30 days after publication.</p>	<p><b><u>Mid – Late 2008</u></b></p> <p><u>Final EIS</u> prepared, including responses to public comments. This includes a series of internal reviews and contractor revisions, approvals by regional director, development of Record of Decision, etc.</p> <p>ROD approved by Regional Director 30 days after FEIS made available to public.</p>

**Golden Gate National Recreation Area Dog Management Plan  
Summary of Range of Alternatives Including Preferred  
July 1, 2010**

**Summary By Alternative**

<b>GOGA managed land (including MUWO/FOPO)</b>		<b>13,992 acres</b>
<b>Alt A – Existing conditions</b>	% open to dogwalking	<b>686 acres - 4.9%</b>
<b>Alt B – NPS Leash Regulation</b>	% proposed for dogwalking	<b>226 acres - 1.6%</b>
<b>Alt C – Multiple Use</b>	% proposed for dogwalking	<b>248 acres - 1.8%</b>
<b>Alt D – Most Protective</b>	% proposed for dogwalking	<b>181 acres - 1.3%</b>
<b>Alt E – Most dogwalking access</b>	% proposed for dogwalking	<b>342 acres - 2.4%</b>
<b>Preferred Alternative</b>	% proposed for dogwalking	<b>252 acres - 1.8%</b>

**Summary By County - Marin**

**GOGA-managed land in Marin - 10,208 acres\***

\*Note: total is greater than area (trails and other designated areas) open to public access.

<b>Acreeage</b>	<b>Off leash or Regulated Off Leash Areas (ROLAs)</b>	<b>On-leash sites</b>
<b>ALT A – Existing Conditions</b> • 208 acres • 2.8% of Marin lands	<ul style="list-style-type: none"> <li>• 6 off leash sites</li> <li>• 208 acres</li> <li>• 2% of Marin lands</li> </ul>	<ul style="list-style-type: none"> <li>• 3 on-leash sites</li> <li>• 78 acres</li> <li>• .8% of Marin lands</li> </ul>
<b>ALT B – NPS Leash regulation</b> • 79 acres • .8% of Marin lands	<b>No ROLAs</b>	<ul style="list-style-type: none"> <li>• 7 on-leash sites</li> <li>• 79 acres</li> <li>• .8% of Marin lands</li> </ul>
<b>ALT C – Emphasis on Multiple Use</b> • 105 acres • 1% of Marin lands	<ul style="list-style-type: none"> <li>• 2 ROLAs</li> <li>• 11 acres</li> <li>• .11% of Marin lands</li> </ul>	<ul style="list-style-type: none"> <li>• 8 on-leash sites</li> <li>• 94 acres</li> <li>• .9% of Marin lands</li> </ul>
<b>ALT D – Most Protective</b> • 65 acres • .6% of Marin lands	<b>No ROLAs</b>	<ul style="list-style-type: none"> <li>• 5 on-leash sites</li> <li>• 65 acres</li> <li>• .6% of Marin lands</li> </ul>
<b>ALT E – Most Dogwalking Access/Most Management Intensive</b> • 107 acres • 1% of Marin lands	<ul style="list-style-type: none"> <li>• 3 ROLAs</li> <li>• 9 acres</li> <li>• .09% Marin lands</li> </ul>	<ul style="list-style-type: none"> <li>• 8 on-leash sites</li> <li>• 98 acres</li> <li>• 1% of Marin lands</li> </ul>
<b>Preferred Alternative (same as Alternative C)</b> • 105 Acres • 1% of Marin lands	<ul style="list-style-type: none"> <li>• 2 ROLAs</li> <li>• 11 acres</li> <li>• .11% of Marin lands</li> </ul>	<ul style="list-style-type: none"> <li>• 8 on-leash sites</li> <li>• 94 acres</li> <li>• .9% of Marin lands</li> </ul>

**Summary By County – San Francisco**

**GOGA-managed land in San Francisco - 972 acres\***

\*Note: total is greater than area (trails and other designated areas) open to public access.

<b>Acreage</b>	<b>Off leash or Regulated Off Leash Areas (ROLAs)</b>	<b>On-leash sites</b>
<b>ALT A – Existing Conditions</b> <ul style="list-style-type: none"> <li>• 389 acres total</li> <li>• 40% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 7 sites with off leash</li> <li>• 350 acres</li> <li>• 36% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 4 sites w/ on-leash</li> <li>• 39 acres</li> <li>• 4% of SF lands</li> </ul>
<b>ALT B – NPS Leash regulation</b> <ul style="list-style-type: none"> <li>• 139 acres total</li> <li>• 14% of SF lands</li> </ul>	No ROLAs	<ul style="list-style-type: none"> <li>• 8 sites w/ on-leash</li> <li>• 139 acres</li> <li>• 14% of SF lands</li> </ul>
<b>ALT C – Emphasis on Multiple Use</b> <ul style="list-style-type: none"> <li>• 136 acres total</li> <li>• 14% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 5 ROLAs</li> <li>• 98 acres</li> <li>• 10% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 8 sites w/ on-leash</li> <li>• 38 acres</li> <li>• 4% of SF lands</li> </ul>
<b>ALT D – Most Protective</b> <ul style="list-style-type: none"> <li>• 116 acres total</li> <li>• 12% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 3 ROLAs</li> <li>• 22 acres</li> <li>• 2% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 7 sites w/ on-leash</li> <li>• 94 acres</li> <li>• 10% of SF lands</li> </ul>
<b>ALT E – Most Dogwalking Access/Most Management Intensive</b> <ul style="list-style-type: none"> <li>• 221 acres total</li> <li>• 23% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 7 ROLAs</li> <li>• 108 acres</li> <li>• 11% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 9 sites w/ on-leash</li> <li>• 113 acres</li> <li>• 12% of SF lands</li> </ul>
<b>Preferred Alternative</b> <ul style="list-style-type: none"> <li>• 138 acres</li> <li>• 14% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 6 ROLAs</li> <li>• 90 acres</li> <li>• 9% of SF lands</li> </ul>	<ul style="list-style-type: none"> <li>• 9 sites w/ on-leash</li> <li>• 48 acres</li> <li>• 5% of SF lands</li> </ul>

**Summary By County – San Mateo**

**GOGA-managed land in San Mateo – 2,812 acres\***

\*Note: total is greater than area (trails and other designated areas) open to public access.

Acreage	Off leash or Regulated Off Leash Areas (ROLAs)	On-leash sites
<b>ALT A – Existing Conditions</b> <ul style="list-style-type: none"> <li>• 11 acres</li> <li>• .4% of San Mateo lands</li> </ul>	No off leash	<ul style="list-style-type: none"> <li>• 3 sites w/ on-leash</li> <li>• 11 acres</li> <li>• .4% of San Mateo lands</li> </ul>
<b>ALT B – NPS Leash regulation</b> <ul style="list-style-type: none"> <li>• 7 acres</li> <li>• .25 % of San Mateo lands</li> </ul>	No ROLAs	<ul style="list-style-type: none"> <li>• 3 sites w/ on-leash</li> <li>• 7 acres</li> <li>• .25 % of San Mateo lands</li> </ul>
<b>ALT C – Emphasis on Multiple Use</b> <ul style="list-style-type: none"> <li>• 9 acres</li> <li>• .32% of San Mateo lands</li> </ul>	No ROLAs	<ul style="list-style-type: none"> <li>• 3 sites w/ on-leash</li> <li>• 9 acres</li> <li>• .32% of San Mateo lands</li> </ul>
<b>ALT D – Most Protective</b>	No ROLAs	No on-leash
<b>ALT E – Most Dogwalking Access/Most Management Intensive</b> <ul style="list-style-type: none"> <li>• 14 acres</li> <li>• .5% of San Mateo lands</li> </ul>	No ROLAs	<ul style="list-style-type: none"> <li>• 5 sites w/ on-leash</li> <li>• 14 acres</li> <li>• .5% of San Mateo lands</li> </ul>
<b>Preferred Alternative (Same as Alternative C)</b> <ul style="list-style-type: none"> <li>• 9 acres</li> <li>• .32% of San Mateo lands</li> </ul>	No ROLAs	<ul style="list-style-type: none"> <li>• 3 sites w/ on-leash</li> <li>• 9 acres</li> <li>• .32% of San Mateo lands</li> </ul>

**GOGA DOG MANAGEMENT PROPOSED RANGE OF ALTERNATIVES**

**Proposed Dogwalking Summary By Alternative**

<b>GOGA managed land (including MUWO/FOPO)</b>	<b>13,992 acres</b>
% now open to dogwalking - <b>Alt A</b>	
% open to dogwalking - <b>Alt C</b>	
% open to dogwalking - <b>Alt D</b>	
% open to dogwalking - <b>Alt E</b>	

**Proposed Dogalking Summary By County**

**Marin – approx.10,208 acres GOGA managed**

<b>ALT A – Existing Conditions</b>	<ul style="list-style-type: none"> <li>● 7 areas</li> <li>● acres</li> </ul>
<b>ALT B – NPS Leash regulation</b>	<ul style="list-style-type: none"> <li>● 7 areas</li> <li>● acres</li> </ul>
<b>ALT C – Emphasis on Multiple Use</b>	<ul style="list-style-type: none"> <li>● 7 areas</li> <li>● acres</li> </ul>
<b>ALT D – Most Restrictive</b>	<ul style="list-style-type: none"> <li>● 5 areas</li> <li>● acres</li> </ul>
<b>ALT E – Most Dogwalking Access/Most Management Intensive</b>	<ul style="list-style-type: none"> <li>● 7 areas</li> <li>● acres</li> </ul>

**San Francisco – 972 acres GOGA managed**

<b>ALT A – Existing Conditions</b>	<ul style="list-style-type: none"> <li>● 10 areas</li> <li>● acres</li> </ul>
<b>ALT B – NPS Leash regulation</b>	<ul style="list-style-type: none"> <li>● 10 areas</li> <li>● acres</li> </ul>
<b>ALT C – Emphasis on Multiple Use</b>	<ul style="list-style-type: none"> <li>● 10 areas</li> <li>● acres</li> </ul>
<b>ALT D – Most Restrictive</b>	<ul style="list-style-type: none"> <li>● 7 areas</li> <li>● acres</li> </ul>
<b>ALT E – Most Dogwalking Access/Most Management Intensive</b>	<ul style="list-style-type: none"> <li>● 10 areas</li> <li>● acres</li> </ul>

**San Mateo – 2812 acres GOGA managed**

<b>ALT A – Existing Conditions –</b>	<ul style="list-style-type: none"> <li>● 5 areas</li> <li>● acres</li> </ul>
<b>ALT B – NPS Leash regulation</b>	<ul style="list-style-type: none"> <li>● 4 areas</li> <li>● acres</li> </ul>
<b>ALT C – Emphasis on Multiple Use</b>	<ul style="list-style-type: none"> <li>● 3 areas</li> <li>● acres</li> </ul>
<b>ALT D – Most Restrictive</b>	
<b>ALT E – Most Dogwalking Access Most Dogwalking Access/Most Management Intensive</b>	<ul style="list-style-type: none"> <li>● 5 areas</li> <li>● acres</li> </ul>

## Proposed Off Leash Use Summary By Alternative

<b>GOGA managed land (including MUWO/FOPO)</b>	<b>13,992 acres</b>
<b>% now open to off-leash use - Alt A</b>	<b>551 acres - 3.9%</b>
<b>% with regulated off leash areas - Alt C</b>	<b>109 acres - .8%</b>
<b>% with regulated off leash areas - Alt D</b>	<b>22 acres - .2%</b>
<b>% with regulated off leash areas - Alt E</b>	<b>117 acres - .8%</b>

### Proposed Off Leash Use Summary By County

#### Marin – approx.10,208 acres GOGA managed

<b>ALT A – Existing Conditions</b>	<ul style="list-style-type: none"> <li>• 5 off leash areas</li> <li>• 208 acres</li> <li>• 2% of GOGA Marin lands</li> </ul>	<b>2 on leash areas</b>
<b>ALT B – NPS Leash regulation</b>		<b>7 on leash areas</b>
<b>ALT C – Emphasis on Multiple Use</b>	<ul style="list-style-type: none"> <li>• 1 regulated off leash area</li> <li>• 10 acres</li> <li>• .10% of GOGA Marin lands</li> </ul>	<b>6 on leash areas</b>
<b>ALT D – Most Restrictive</b>		<b>5 on leash areas</b>
<b>ALT E – Most Dogwalking Access/Most Management Intensive</b>	<ul style="list-style-type: none"> <li>• 3 regulated off leash areas</li> <li>• 9 acres</li> <li>• .09% GOGA Marin lands</li> </ul>	<b>4 on leash areas</b>

#### San Francisco – 972 acres GOGA managed

<b>ALT A – Existing Conditions</b>	<ul style="list-style-type: none"> <li>• 7 off leash areas</li> <li>• 350 acres</li> <li>• 36% of GOGA SF lands</li> </ul>	<b>3 on leash areas</b>
<b>ALT B – NPS Leash regulation</b>		<b>10 on leash areas</b>
<b>ALT C – Emphasis on Multiple Use</b>	<ul style="list-style-type: none"> <li>• 5 regulated off leash areas</li> <li>• 98 acres</li> <li>• 10% of GOGA SF lands</li> </ul>	<b>5 on leash areas</b>
<b>ALT D – Most Restrictive</b>	<ul style="list-style-type: none"> <li>• 3 regulated off leash areas</li> <li>• 22 acres</li> <li>• 2% of GOGA SF lands</li> </ul>	<b>4 on leash areas</b>
<b>ALT E – Most Dogwalking Access/Most Management Intensive</b>	<ul style="list-style-type: none"> <li>• 7 regulated off leash areas</li> <li>• 108 acres</li> <li>• 11% of GOGA SF lands</li> </ul>	<b>3 on leash areas</b>

#### San Mateo – 2812 acres GOGA managed

<b>ALT A – Existing Conditions –</b>		<b>5 on leash areas</b>
<b>ALT B – NPS Leash regulation</b>		<b>4 on leash areas</b>
<b>ALT C – Emphasis on Multiple Use</b>		<b>3 on leash areas</b>
<b>ALT D – Most Restrictive</b>		
<b>ALT E – Most Dogwalking Access Most Dogwalking Access/Most Management Intensive</b>		<b>5 on leash areas</b>

**REVISED DRAFT ESTIMATED TIMELINE  
GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES  
July 6, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>	<b>NPS Tasks</b>
<p><b><u>February 17, 2006</u></b> Notice of Establishment for Committee and Notice of Committee Meeting published in Federal Register; Members appointed</p>	<p><b><u>February 22, 2006</u></b> EIS Notice of Intent published in Federal Register; Starts 60 day scoping (ends April 2006). Contractor begins analyses of no action alternative (existing management continued)</p>	
<p><b><u>March 6, 2006</u></b> NR Committee Meeting #1: Introductions of DFO/Committee, Facilitator Evaluation, Protocols, Applicable Statutes/Regulations, NEPA Process/Schedule, NPS Sideboards, Public comment.</p>	<p><b><u>March 2006</u></b> Information collection by NEPA Interdisciplinary Team (IDT)</p>	<p><b><u>March 2006</u></b> <b>Information collection by NEPA Interdisciplinary Team (IDT)</b></p>
<p><b><u>April 4 and 5, 2006</u></b> Committee attends NEPA Public Scoping workshops.</p> <p>Committee provides comments to NPS-NEPA public scoping (comment period ends 4/24).</p>	<p><b><u>April 4 and 5, 2006</u></b> Public scoping workshops</p>	<p><b><u>April 4 and 5, 2006</u></b> <b>Participation in public scoping workshops</b></p>
<p><b><u>April 18, 2006</u></b> NR Committee Meeting #2: Information Updates [Accelerated Resource Protection Rulemaking], Revise Draft Protocols, Committee Schedule/Logistics, Public comment.</p>	<p><b><u>April:</u></b> Analysis of Public Scoping Comments</p> <p>Development of No Action Alternative; impact thresholds; drafting of Affected Environment</p>	

**REVISED DRAFT ESTIMATED TIMELINE  
GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES  
July 6, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>	<b>NPS Tasks</b>
<p><b><u>May 15, 2006</u></b> NR Committee Meeting #3: Final Protocol revisions approval, NPS Parameters and Scope (Sideboards) and NEPA EIS No Action Alternative, Draft Collaborative Approach to Decision Making, Information Needs (including creation of a Technical Subcommittee and initial charge), Public comment.</p>	<p><b><u>May:</u></b> Analysis of Public Scoping Comments continues</p> <p>Development of No Action Alternative; impact thresholds; drafting of Affected Environment</p> <p>Preliminary data collection in response to Committee Meeting #3 information needs.</p>	<p><b><u>May:</u></b></p> <ul style="list-style-type: none"> <li>• <b>In response to Committee Meeting #3 information needs, Data Needs List created for preliminary data collection for NR. Park provides information to EQD/TQNEPA. Data List used to consolidate data needs for both NEPA and NR</b></li> </ul>
<p><b><u>July 18:</u></b> Technical Subcommittee Meeting #1: Identify essential data, review available data/data by geographic areas gathered by NEPA IDT and identify data gaps, discuss recommendation for Committee. Next steps to prepare for Committee mtg.</p> <p>(Possible Committee field trip/s or individual visits to dog walking locations with GGNRA)</p>	<p><b><u>June-July:</u></b></p> <p>Data collection continues; IDT review of No Action Alternative; preliminary draft Affected Environment; draft impact thresholds.</p> <p>Presentation to Technical Subcommittee re data.</p> <p>Public Scoping Content Analysis complete.</p>	<p><b><u>June-July:</u></b></p> <ul style="list-style-type: none"> <li>• <b>Data collection continues</b></li> <li>• <b>IDT review preliminary drafts of No Action Alternative; Affected Environment; impact thresholds</b></li> </ul>
<p><b><u>July 31:</u></b> NR Committee Meeting #4: Review data needs recommendation from Technical Subcommittee Meeting #1 and decide next steps, Review initial Key Interests and Issues Table, Review Public Scoping Content Analysis, NEPA IDT Data Needs/Questions</p>	<p><b><u>End of July</u></b> NEPA IDT comments on No Action Alternative, impact thresholds, and draft Affected Environment consolidated and to NEPA contractor.</p>	<p><b><u>End of July</u></b></p> <ul style="list-style-type: none"> <li>• <b>EQD/TQNEPA come up with Preliminary Draft Criteria for EIS and NR Committee w/ input from DH and MB and send to park for review.</b></li> </ul>

**REVISED DRAFT ESTIMATED TIMELINE  
GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES  
July 6, 2006**

<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>	<b>NPS Tasks</b>
<p>for Committee Members; Public Comment.</p> <p>Options: USFWS presentation on T/E species consultation process.</p> <p>NEPA IDT Preliminary Draft Criteria.</p>	<p>NEPA IDT: Review preliminary Draft Criteria. (Proposed meeting or conference call)</p>	
<p><b><u>August/September (?)</u></b></p> <p>Technical Subcommittee Meeting #2: Further discussion of data needs next steps based on NR Committee Mtg#4. Include assessment of NEPA database for the various locations discussed during Committee #4.</p> <p>Option: Caucuses refine Key Interests and Issues Table.</p> <p>Option: Develop initial options for GGNRA-wide issues such as criteria for voice control, commercial dogwalking.</p>	<p><b><u>August 1, 2006:</u></b> NEPA Agency Scoping.</p> <p><b><u>August/September 2006</u></b></p> <p>NEPA IDT initiates informal consultation with USFWS.</p> <p>Final No Action Alternative and Affected Environment prepared by NEPA contractor.</p> <p>Impact Thresholds revised. Analysis of No Action Alternative begins.</p> <p>Attributes (based upon NEPA data base) of each site reviewed by NEPA IDT and preliminary alternatives developed using systematic approach. (Proposed meeting in August or Sept?)</p> <p>(Note: Attributes and NR committee's "criteria" should be shared information)</p>	<p><b><u>August/September 2006:</u></b></p> <ul style="list-style-type: none"> <li>• <b>IDT initiates informal consultation with USFWS.</b></li> <li>• <b>Attributes (based upon NEPA data base) of each site reviewed by NEPA IDT and preliminary alternatives developed using systematic approach. (Proposed meeting in August or September?)</b></li> </ul>

**REVISED DRAFT ESTIMATED TIMELINE  
GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES  
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<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>	<b>NPS Tasks</b>
<p><b><u>September 21, 2006</u></b></p> <p>NR Committee Meeting #5: Discuss outcomes of Technical Subcommittee Meeting #2; Review revisions to Key Interests and Issues Table; Review initial options for individual sites and jointly evaluate; review initial options for GGNRA-wide issues and jointly evaluate; Agree on next steps.</p> <p>Option: NEPA IDT could present its approach to developing preliminary alternatives and those alternatives to the NR committee. In other ADR/NEPA processes, the NEPA IDT has presented preliminary alternatives as a starting point for NR deliberations.</p> <p>Caucus efforts: TBD</p>	<p><b><u>September 2006</u></b></p> <p>NEPA IDT Revises Preliminary Alternatives. (Proposed meeting in September)</p> <p><b><u>End of September:</u></b> Draft Impacts of No Action Alternative prepared by contractor.</p>	<p><b><u>September 2006</u></b></p> <ul style="list-style-type: none"> <li>• <b>NEPA IDT Revises Preliminary Alternatives. (Proposed meeting in September)</b></li> </ul>
<p><b><u>October 2006?</u></b></p> <p>NR Committee Meeting #6: Focus on GGNRA area-specific dog management options, discuss area-specific issues and consider draft consensus language. Review draft consensus language pertaining to GGNRA-wide dog management options.</p> <p>Note: This is where NEPA and NR must</p>	<p><b><u>October 2006</u></b></p> <p>NEPA IDT reviews Impacts of No Action. Park consolidates comments for contractor.</p> <p>Revision of Alternatives continues.</p>	<p><b><u>October 2006</u></b></p> <ul style="list-style-type: none"> <li>• <b>NEPA IDT reviews Impacts of No Action. Park consolidates comments for contractor.</b></li> </ul>

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GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES  
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<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>	<b>NPS Tasks</b>
<p>intersect. An option (used in other ADR/NEPA processes according to IECR) is for the NR committee to draft its “option(s) for each site and for NEPA IDT to do a preliminary impact analysis on those options and provide some feedback so any necessary adjustments can be considered early on.</p>		
<p><b><u>November 2006 (?)</u></b> NR Committee Meeting #7: Review draft area-specific options; discuss integration of GGNRA-wide and area-specific options, and options/agreements discussed; discuss options for dealing with topics/areas where consensus has not yet been reached</p> <p>Note: NEPA team should be doing concurrent impact analysis for feedback and adjustments. NEPA IDT will also be proceeding with impact analysis and adjustments to a full range of reasonable alternatives which may help inform NR committee as it proceeds to revise its area-specific options.</p>	<p><b><u>November 2006</u></b></p> <p>NEPA IDT presents range of alternatives to be analyzed in the EIS to region/WASO for concurrence.</p> <p>Newsletter prepared to obtain public comment on alternatives. (Optional)</p> <p>(Note: NR committee should comment on NEPA alternatives throughout their development).</p>	<p><b><u>November 2006</u></b></p> <ul style="list-style-type: none"> <li>• <b>NEPA IDT presents range of alternatives to be analyzed in the EIS to region/WASO for concurrence.</b></li> </ul>
<p><b><u>December 2006?</u></b> NR Committee Meeting #8: Finalize consensus on areas of agreement and options for addressing topics/areas where consensus has not yet been reached.</p>	<p><b><u>December 2006</u></b> Assuming NR Committee has reached consensus, the NEPA IDT would include the actions in the rule as one alternative in the range of alternatives and continue to complete its impact analysis on those alternatives.</p>	<p><b><u>December 2006</u></b></p> <ul style="list-style-type: none"> <li>• <b>Assuming NR Committee has reached consensus, the NEPA IDT would include the actions in the rule as one alternative in the range of alternatives and continue to</b></li> </ul>

**REVISED DRAFT ESTIMATED TIMELINE  
GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES  
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<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>	<b>NPS Tasks</b>
<p>Note: It may be advantageous for the NR Committee to hold off finalizing consensus until NEPA analysis is complete on the actions proposed in the rule.</p>	<p>Note: A biological assessment must also be prepared on the “proposed draft rule/NEPA preferred alternative” (prepared if likely to adversely affect, or not sure) which suggests that the NEPA IDT and NR committee (or a subcommittee) should be working concurrently to resolve T/E species concerns. NEPA contractor prepares BA for park.</p>	<p><b>complete its impact analysis on those alternatives.</b></p> <ul style="list-style-type: none"> <li>• <b>DOI takes final consensus language as basis for initial draft of rule.</b></li> </ul>
<p><b><u>January –April 2007</u></b></p> <p>At any point during this time, the NR committee could meet to revise its consensus based upon interaction with NEPA IDT.</p>	<p><b><u>March 2007</u></b></p> <p>Preliminary impact analysis complete for range of alternatives. NEPA IDT reviews findings and provides comments to contractor.</p>	<p><b><u>January –April 2007</u></b></p> <ul style="list-style-type: none"> <li>• <b>If needed, convene NR Committee to revise consensus based on interaction with NEPA IDT</b></li> </ul>
<p><b><u>April –August 2007</u></b></p> <p>Draft Rule Package prepared for DOI, SOL and OMB review (this includes OMB’s requirements for economic analysis, which will be prepared by NEPA contractor). This time period includes a series of internal reviews and revisions as needed to meet regulatory rulemaking requirements.</p>	<p><b><u>April 2007</u></b></p> <p>Contractor revises impact analysis and NEPA IDT meets to select preferred alternative using a method such as “Choosing by Advantage”, or Delphi Process (systematic approach to measure how well each alternative meets objectives).</p> <p>Contractor begins to prepare preliminary draft Biological Assessment on preferred alternative.</p>	<p><b><u>April 2007</u></b></p> <ul style="list-style-type: none"> <li>• <b>NEPA IDT meets to select preferred alternative using a method such as “Choosing by Advantage”, or Delphi Process (systematic approach to measure how well each alternative meets objectives).</b></li> </ul>

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<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>	<b>NPS Tasks</b>
	<p><b><u>May-July 2007</u></b> Contractor prepares internal draft EIS for NPS review and comment.</p> <p>Consultation with USFWS continues as Draft Biological Assessment is completed by NEPA contractor.</p>	<p><b><u>May-July 2007</u></b></p> <ul style="list-style-type: none"> <li>• <b>NPS review and comment on internal draft EIS for NPS review and comment.</b></li> </ul>
<p><b><u>August – October 2007</u></b></p> <p>This is the time the NEPA IDT/contractor will be producing the DEIS for public comment. Major changes by DOI, SOL or OMB to draft rule would affect NEPA timeline if further analysis is required. OMB review can take a minimum of 90 days.</p>	<p><b><u>August – October 2007</u></b></p> <p>Contractor prepares DEIS for public review. (This time period includes a series of internal reviews and document revisions)</p> <p>When DEIS is released for public review, Biological Assessment is submitted to USFWS requesting, if needed, their Biological Opinion. (USFWS review can take up to 90 days)</p>	<p><b><u>August – October 2007</u></b></p> <ul style="list-style-type: none"> <li>• <b>Internal reviews and document revisions DEIS for public review.</b></li> </ul>
<p><b><u>November 2007</u></b></p> <p>Draft rule published in Federal Register for public comment (usually 60 day public comment period)</p>	<p><b><u>November-December 2007</u></b></p> <p>Dog Management Plan/DEIS released for public review (60 day comment period); public meetings.</p>	<p><b><u>November-December 2007</u></b></p> <ul style="list-style-type: none"> <li>• <b>Possible public meetings (2) for DEIS</b></li> </ul>
<p><b><u>Early 2008</u></b></p> <p>Begin preparation of final rule based upon public comment analysis (from comments received on the EIS and proposed rule—these</p>	<p><b><u>Early 2008</u></b></p> <p>Review public comments on DEIS and proposed draft rule. Modify preferred alternative if needed to respond to public and agencies' comments.</p>	<p><b><u>Early 2008</u></b></p> <ul style="list-style-type: none"> <li>• <b>Review public comments on DEIS and proposed draft rule.</b></li> </ul>

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<b>Negotiated Rulemaking (NR) Advisory Committee Process</b>	<b>NEPA Process</b>	<b>NPS Tasks</b>
<p>tend to be overlapping). Option here may be to re-engage the NR committee to help resolve issues brought up during comment periods. (NOTE: committee charter expires in February 2008)</p>		
<p><b><u>Mid – Late 2008</u></b></p> <p>Final rule prepared for review. OMB will normally not review final rules without the NEPA decision document being signed (in this case the ROD). Final rule would also need to reflect any changes in NEPA preferred alternative and vice versa.</p> <p>Final rule published in Federal Register. Implementation begins 30 days after publication.</p>	<p><b><u>Mid – Late 2008</u></b></p> <p>Final EIS prepared, including responses to public comments. This includes a series of internal reviews and contractor revisions, approvals by regional director, development of Record of Decision, etc.</p> <p>ROD approved by Regional Director 30 days after FEIS made available to public.</p>	<p><b><u>Mid – Late 2008</u></b></p> <ul style="list-style-type: none"> <li>• <b>Internal reviews of and preparation of Final EIS, including responses to public comments.</b></li> <li>• <b>Public outreach and education</b></li> <li>• <b>Implement Dog Management Plan</b></li> </ul>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**June 19, 2007**

<b>Negotiated Rulemaking (NR) Process</b>	<b>NEPA Process</b>
<p><b><u>June 28, 2007:</u></b>  NR Subcommittee Meeting</p> <ul style="list-style-type: none"> <li>○ Review FT and others' proposals for Off Leash Areas</li> <li>○ Next Steps</li> </ul>	<p><b><u>June 2007</u></b>  Further refine NEPA Alternatives  Develop elements of Implementation Strategies, including law enforcement, monitoring, potential "tag" program, commercial dog walking.</p>
<p><b><u>July 2007</u></b></p> <p>Prepare for August full committee meeting including draft report findings</p>	<p><b><u>July 2007</u></b></p> <p>Further refine NEPA Alternatives  Complete collection of existing data  Refine elements of Implementation Strategies (see above)  Develop costs of NEPA Alternatives  Revise Impact Thresholds for DEIS analysis  Contracting actions for DEIS</p>
<p><b><u>August 3 or 4, 2007</u></b></p> <p>Full committee meeting   (Draft report recommendations for discussion)</p>	<p><b><u>August 2007</u></b></p> <p>Finalize details of Implementation Strategies  Revise alternatives/incorporate full committee findings  Finalize Impact Thresholds for park review  Draft Chapter 1 complete</p>
<p><b><u>September 2007</u></b></p> <p>NR Committee Meeting ("extra meeting")</p> <ul style="list-style-type: none"> <li>○ Finalize Report Findings</li> </ul>	<p><b><u>September 2007</u></b></p> <p>Impact analysis of range of alternatives/implementation strategies begins</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**June 19, 2007**

Negotiated Rulemaking (NR) Process	NEPA Process
	<p><b><u>October 2007</u></b></p> <p>Impact analysis continues</p>
	<p><b><u>November 2007</u></b></p> <p>Impact analysis continues</p>
	<p><b><u>December 2007</u></b></p> <p><b><u>Internal DEIS submitted to NPS</u></b>  <b><u>Draft Rule preparation begins</u></b></p>
	<p><b><u>January 2008</u></b></p> <p>Identification of NPS Preferred Alternative (consultations with Region, Washington, SOL) potentially using “Choosing by Advantage” or similar process</p> <p>NPS comments on Internal DEIS</p> <p>Revision begins</p> <p>Biological Assessment of Preferred Alternative begins</p>
<p><b><u>Note—previous schedule says Charter expires in Feb 2008.</u></b></p>	<p><b><u>February 2008</u></b></p> <p>Revision of Internal DEIS complete and submitted to NPS</p> <p>Consultation with USFWS and NMF on Biological Assessment</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**June 19, 2007**

Negotiated Rulemaking (NR) Process	NEPA Process
	<p><b><u>March 2008</u></b></p> <p>NPS review complete; begin preparation of Camera Ready DEIS            NPS revision of Draft Rule continues            Agency consultations continue to finalize Biological Assessment</p>
<p><b><u>April 2008</u></b>  <b><u>(Note—it is assumed that the Draft Rule Package is written by NPS, but with input from Committee if Charter is extended)</u></b></p> <p>Draft Rule Package prepared for DOI, SOL and OMB review (this includes OMB’s requirements for economic analysis, which will be prepared by NEPA contractor). This time period includes a series of internal reviews and revisions as needed to meet regulatory rulemaking requirements. OMB review can take up to 90 days unless expedited.</p>	<p><b><u>April 2008</u></b></p> <p>Agency consultations complete            Camera Ready DEIS submitted for NPS review            (Assume 2 week turn around)            Camera Ready DEIS prepared for printing            Federal Register notices prepared and approved</p>
<b>BEGINNING OF FORMAL RULEMAKING PROCESS</b>	
<p><b><u>May – June 2008</u></b></p> <p>Draft Rule in FR (concurrent with release of DEIS)</p>	<p><b><u>May – June 2008</u></b></p> <p>Camera Ready DEIS to printer and distribution to public</p>
<p><b><u>June-August 2008</u></b></p> <p>Comment period on Draft Rule (minimum of 60 days)</p>	<p><b><u>June – August 2008</u></b></p> <p>DEIS public comment period (minimum of 60 days); public meetings  <b>When DEIS is released for public review, Biological Assessment is submitted to USFWS requesting, if needed, their Biological Opinion. (USFWS review can take up to 90 days)</b></p>

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<b>Negotiated Rulemaking (NR) Process</b>	<b>NEPA Process</b>
<p><b><u>September-October 2008</u></b></p> <p>Analysis of comments on Draft Rule</p>	<p><b><u>September - October 2008</u></b></p> <p>Analysis of comments on DEIS</p>
<p><b><u>Late Fall 2008</u></b></p> <p>Begin preparation of final rule based upon public comment analysis (from comments received on the EIS and proposed rule—these tend to be overlapping). Option here may be to re-engage the NR committee to help resolve issues brought up during comment periods.</p>	<p><b><u>Late Fall 2008</u></b></p> <p>Modify preferred alternative if needed to respond to public and agencies' comments.</p>
<p><b><u>Early 2009</u></b></p> <p>Final rule prepared for review. OMB will normally not review final rules without the NEPA decision document being signed (in this case the ROD). Final rule would also need to reflect any changes in NEPA preferred alternative and vice versa.</p> <p>Final rule published in Federal Register. Implementation begins 30 days after publication.</p>	<p><b><u>Early 2009</u></b></p> <p><u>Final EIS</u> prepared, including responses to public comments. This includes a series of internal reviews and contractor revisions, approvals by regional director, development of Record of Decision, etc.</p> <p>ROD approved by Regional Director 30 days after FEIS made available to public.</p>

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**July 12, 2007**  
**Attachment 1**

<b>Negotiated Rulemaking (NR) Process</b>	<b>NEPA Process</b>
<p><u>August 2007</u></p> <p>Caucus discussions <del>continue</del>.</p>	<p><u>August 2007</u></p> <p>Anticipated contract award. NPS continues deliberations on preliminary alternatives, LE strategy, adaptive management, Commercial Dog Walking. Site options discussed with GOGA <del>LA-LE</del> to develop preliminary costs.</p> <p><b>Task 1. Kick Off Conference Call completed; administrative record and background materials reviewed.</b></p>
<p><u>September 2007</u></p> <p>Caucus discussions continue.</p>	<p><u>September 2007</u></p> <p>Contractor continues to review materials. Work on Task 3 (A and C) and Task 4 (Affected Environment and Chapter 1) and 3(D) ( Impact Thresholds and Methodology ) may proceed.</p> <p>NPS continues deliberations on preliminary alternatives, LE strategy, adaptive management, Commercial Dog Walking. Site options discussed with GOGA LA to develop preliminary costs.</p>
<p><u>October 2007</u></p> <p>Committee meeting to review ROLA principles and proposals for sites, etc.</p>	<p><u>October 2007</u></p> <p><b>Task 2 A. Site Visits and Meeting Attendance</b>  Contractor conducts site visits and attends reg neg meeting. <del>Discussion of schedule. - Discussion of schedule,</del> background, <del>-preliminary alternatives and adaptive management strategy with park. egy with park.</del></p> <p><b>Task 3 (A) Revised Outline submitted for NPS review and approval.</b>  <b>Task 3 (B) Work on Draft Chapter 2 may proceed (preparation for</b></p>

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**Attachment 1**

<b><del>Negotiated</del> Rulemaking (NR) Process</b>	<b>NEPA Process</b>
	<b>alternatives meeting in November and revision of No-Action Alt.)</b>
<p><b><u>November 2007</u></b></p> <p>Anticipated Reg Neg Meeting to reach agreements on ROLA principles, sites, remaining issues, etc.</p> <p>Draft Summary Report Prepared for review and comment.</p>	<p><b><u>November 2007</u></b></p> <p><b>Task 2 B. Remaining Site Visit and Alternatives Meeting.</b> Contractor visits remaining sites, attends reg neg meeting and assists NPS with alternatives meeting, including discussion of adaptive management strategy, LE, Commercial Dog Walking, Thresholds etc.</p> <p><b>Task 3(A) complete; final Plan/EIS outline approved.</b></p> <p><b>Task 3(C) and 3(D) Revised Impact Thresholds and Methodologies and Draft Adaptive Management Strategy submitted to NPS for review and approval.</b></p> <p><b>Task 4(A) Preparation of Preliminary Internal Draft EIS may proceed.</b></p>
<p><b><u>December 2007</u></b></p> <p>Final Summary Report Submitted.</p>	<p><b><u>December 2007</u></b></p> <p><b>Task 3(B) Draft Chapter 2 (Alternatives) submitted for NPS review and approval.</b></p> <p><b>Task 3(C) Final Impact Thresholds and Methodologies completed.</b></p>
<p>NPS preparation of draft Rule begins (assumes approach as was done for GOGA Section 7 Bicycle Rule)</p>	<p><b><u>January 2008</u></b></p> <p><b>Task 3(D) Adaptive Management Strategy finalized.</b></p> <p><b>Task 3(B) Final Chapter 2 (Alternatives) submitted for approval.</b></p>

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<b><del>Negotiated</del> Rulemaking (NR) Process</b>	<b>NEPA Process</b>
	<del>NPS preparation of draft Rule begins (assumes approach as was done for Bieyele Rule)</del>
<u>Note—previous schedule says Charter expires in Feb 2008.</u>  <u>(Possible scenario is to have Committee reconvene for briefing on results of impact analysis if WASO agrees to extend charter)</u>	<u>February 2008</u>  Task 4(A) Preliminary Internal Draft EIS submitted for NPS review.
	<u>March 2008</u>  NPS review complete.  Task 4(C) Round Table Review.
<u>May - July 2008</u>  NPS begins preparation of Draft Rule Package for DOI, SOL and OMB review (this includes OMB’s requirements for economic analysis, which will be prepared by NEPA contractor) reflecting NPS’s Preferred Alternative. This time period includes a series of internal reviews and revisions as needed to meet regulatory rulemaking requirements. OMB review can take up to 90 days unless expedited.	<u>April 2008</u>  <b>Task 5. (Identification of Preferred and Environmentally Preferred Alternative; preparation of materials and assist in NPS facilitation).</b> Identification of NPS Preferred Alternative (consultations with Region, Washington, SOL) potentially using “Choosing by Advantage” or similar process.  <b>Task 6. Preparation of Draft BA and Draft Coastal Zone Consistency Determination begins based upon identification of Preferred Alternative.</b>

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Negotiated Rulemaking (NR) Process	NEPA Process
	<p><u>May 2008</u></p> <p><b>Task 6. Submittal of Draft BA and Draft Coastal Zone Consistency Determination to NPS for review and approval.</b></p>
	<p><u>June 2008</u></p> <p><b>Task 6. Final BA and Coastal Zone Consistency Determination.</b></p> <p>Preparation of Camera Ready DEIS (not included under this SOW).</p>
<p><u>July-September 2008</u></p> <p>NPS finalizes Draft Rule Package, complete WASO and OMB review and FR process. Release of Draft Rule anticipated concurrently with the Plan/DEIS for 60 day public comment.</p>	<p><u>July-September 2008</u></p> <p>Plan/DEIS is prepared, NPS review and approved for release to public comment. FR notices prepared.  DEIS Public comment review begins (minimum of 60 days).</p> <p>Consultation with USFWS and NMF begins (concurrent with release of DEIS; agency review can take up to 90 days)</p>

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<b>Negotiated Rulemaking (NR) Process</b>	<b>NEPA Process</b>
<p><b><u>September-December 2008</u></b></p> <p>Analysis of comments on Draft Rule begins.</p>	<p><b><u>September - December 2008</u></b></p> <p>Analysis of comments on Plan/DEIS begins.</p>
<p><b><u>Early 2009</u></b></p> <p>Begin preparation of final rule based upon public comment analysis (from comments received on the EIS and proposed rule—these tend to be overlapping). Option here may be to re-engage the NR committee to help resolve issues brought up during comment periods.</p>	<p><b><u>Early 2009</u></b></p> <p>Modify preferred alternative if needed to respond to public and agencies' comments.</p>
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**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 24, 2007 (SES edits)**

Negotiated Rulemaking (NR) Process	NEPA Process
<p><u>August 2007</u></p> <p>Caucus discussions.</p>	<p><u>August 2007</u></p> <p>Anticipated contract award (August or by mid-Sept).</p> <p>NPS continues deliberations on preliminary alternatives, LE strategy, adaptive management, Commercial Dog Walking.</p>
<p><u>September 2007</u></p> <p>Caucus discussions continue.</p>	<p><u>September 2007</u></p> <p><b>Task 1. Kick Off Conference Call completed; administrative record and background materials reviewed.</b></p> <p>Contractor continues to review materials. Work on Task 3 (A and C) and Task 4 (Affected Environment and Chapter 1) and 3(D) ( Impact Thresholds and Methodology )may proceed.</p> <p>NPS continues deliberations on preliminary alternatives, LE strategy, adaptive management, Commercial Dog Walking.</p> <p>DSC LA at GOGA to review site options for development of schematic designs/ preliminary costs.</p>
<p><u>October 2007</u></p> <p>Committee meeting to review ROLA principles and proposals for sites, etc.</p>	<p><u>October 2007</u></p> <p><b>Task 2 A. Site Visits and Meeting Attendance</b></p> <p>Contractor conducts site visits and attends reg neg meeting. Discussion of schedule, background, preliminary alternatives and adaptive management</p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 24, 2007 (SES edits)**

Negotiated Rulemaking (NR) Process	NEPA Process
	<p>strategy with park.</p> <p><b>Task 3 (A) Revised Outline submitted for NPS review and approval.</b>  <b>Task 3 (B) Work on Draft Chapter 2 may proceed (preparation for alternatives meeting in November and revision of No-Action Alt.).</b></p>
<p><b><u>Late October 2007</u></b></p> <p>Anticipated Reg Neg Meeting to reach agreements on ROLA principles, sites, remaining issues, etc.</p> <p><b><u>November 2007</u></b></p> <p>Draft Summary Report Prepared for review and comment.</p>	<p><b><u>November 2007</u></b></p> <p><b>Task 2 B. Remaining Site Visit and Alternatives Meeting.</b> Contractor visits remaining sites, attends reg neg meeting and assists NPS with alternatives meeting, including discussion of adaptive management strategy, LE, Commercial Dog Walking, Thresholds etc.</p> <p><b>Task 3(A) complete; final Plan/EIS outline approved.</b>  <b>Task 3(C) and 3(D) Revised Impact Thresholds and Methodologies and Draft Adaptive Management Strategy submitted to NPS for review and approval.</b>  <b>Task 4(A) Preparation of Preliminary Internal Draft EIS may proceed.</b></p>
<p><b><u>December 2007</u></b></p> <p>Final Summary Report Submitted.</p>	<p><b><u>December 2007</u></b></p> <p><b>Task 3(B) Draft Chapter 2 (Alternatives) submitted for NPS review and approval.</b>  <b>Task 3(C) Final Impact Thresholds and Methodologies completed.</b></p>
	<p><b><u>January 2008</u></b></p> <p><b>Task 3(D) Adaptive Management Strategy finalized.</b>  <b>Task 3(B) Final Chapter 2 (Alternatives) submitted for approval.</b></p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 24, 2007 (SES edits)**

<b>Negotiated Rulemaking (NR) Process</b>	<b>NEPA Process</b>
	NPS preparation of draft Rule begins (assumes approach as was done for GOGA Section 7 Bicycle Rule)
<p><u>Note—previous schedule says Charter expires in Feb 2008.</u></p> <p><u>(Possible scenario is to have Committee reconvene for briefing on results of impact analysis if charter extended)</u></p>	<p><b><u>February 2008</u></b></p> <p>Task 4(A) Preliminary Internal Draft EIS submitted for NPS review.</p>
	<p><b><u>March 2008</u></b></p> <p>NPS review complete.</p> <p><b>Task 4(C) Round Table Review.</b></p>
<p><b><u>May - July 2008</u></b></p> <p>NPS begins preparation of Draft Rule Package for DOI, SOL and OMB review (this includes OMB’s requirements for economic analysis, which will be prepared by NEPA contractor) reflecting NPS’s Preferred Alternative. This time period includes a series of internal reviews and revisions as needed to meet regulatory rulemaking requirements. OMB review can take up to 90 days unless expedited.</p>	<p><b><u>April 2008</u></b></p> <p><b>Task 5. (Identification of Preferred and Environmentally Preferred Alternative; preparation of materials and assist in NPS facilitation).</b> Identification of NPS Preferred Alternative (consultations with Region, Washington, SOL) potentially using “Choosing by Advantage” or similar process.</p> <p><b>Task 6. Preparation of Draft BA and Draft Coastal Zone Consistency Determination begins based upon identification of Preferred Alternative.</b></p>

**REVISED DISCUSSION DRAFT**  
**ESTIMATED TIMELINE GGNRA NEGOTIATED RULEMAKING/NEPA PROCESSES**  
**August 24, 2007 (SES edits)**

<b>Negotiated Rulemaking (NR) Process</b>	<b>NEPA Process</b>
	<p><b><u>May 2008</u></b></p> <p><b>Task 6. Submittal of Draft BA and Draft Coastal Zone Consistency Determination to NPS for review and approval.</b></p>
	<p><b><u>June 2008</u></b></p> <p><b>Task 6. Final BA and Coastal Zone Consistency Determination.</b></p> <p>Preparation of Camera Ready DEIS (not included under this SOW).</p>
<p><b><u>July-September 2008</u></b></p> <p>NPS finalizes Draft Rule Package, complete WASO and OMB review and FR process. Release of Draft Rule anticipated concurrently with the Plan/DEIS for 60 day public comment.</p>	<p><b><u>July-September 2008</u></b></p> <p>Plan/DEIS is prepared, NPS review and approved for release to public comment. FR notices prepared.  DEIS Public comment review begins (minimum of 60 days).</p> <p>Consultation with USFWS and NMF begins (concurrent with release of DEIS; agency review can take up to 90 days)</p>

**REVISED DISCUSSION DRAFT**  
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**August 24, 2007 (SES edits)**

<b>Negotiated Rulemaking (NR) Process</b>	<b>NEPA Process</b>
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## San Mateo Team

### 2-23-12 Agenda

9:30am – 11am, Building 201 Fort Mason, 1<sup>st</sup> Floor

- Rancho update
  - Soup/Cider Recap
  - Schedule upcoming events
    - April, Moss Beach – April 21 or 28?
    - June, Montara - ribbon-cutting June 9, 16, or 23?
  - Interim trail plan (Maint to assess alignments on pad map trails – ID/address any safety or resource issues)
  - Ocean View trail users disturbing equestrian ops
  - Signs – content, vandalism, funding
  - MCC – Rancho 3 subcommittees (trailheads, fire, dogs)
  - Caltrans cooperative agreement
  
- Hwy 1 mobility study – presentation 2/29
- Milagra Ridge / Connemara HOA – general approach to HOA's?
- Pedro Point acquisition (may come in next year – SES to get any additional input on trails from Christine)
- Workplan priorities (SEIS is noted as priority for 2012)

**Summary of Outstanding Action Items from 1/26/12**

Action Items	Assigned Staff	Due Date	Completion Date <i>(verified by Christine)</i>	
1. Coordinate mowing with breeding season	Mike, Susie	3/1/12		
2. Meet with POST re: Gundel settlement	Nancy, Christine	2/23/12	2/2/12	✓
3. Print padmaps & provide to LE	Christine	2/23/12	Finalized 2/23, in production for print	
4. Determine cost and permit process for water quality monitoring	Susie	2/23/12	Delayed due to staff availability	
5. Incorporate "No Public Access" sign into sign plans at boundary of Ember Ridge	Christine	2/23/12		
6. Meet with CCWD re: water access	Nancy, Christine, Susie	2/23/12	2/2/12	✓
7. Discuss support letter to GGNRA Liaison Committee	Nancy, Christine, Aaron	2/22/12	Liaison Committee Meeting cancelled for February.	
8. Finalize workplans	ALL	2/23/12	2/23/12	✓
9. Attend Rancho welcome & service event	TBD	2/11/12	2/11/12	✓
10. Resolve tree complaint - Harbour Way	Christine	1/26/12	Trees cut down unexpectedly. Kevin & Scott to follow-up	
11. Coordinate with HEAL project	Christine, Susie	1/26/12	Coordinated with Planning Dept. Site visit 2/21/12	
12. Meet with County Parks	Brian, Christine	1/26/12	Delayed due to County availability	
13. Update unfunded needs lists to reflect current known unfunded costs for Rancho	ALL	ASAP		

## San Mateo Team

### 1/24/13 Agenda

9:30 – 11am

Building 201 Fort Mason, Golden Gate Room

- |   |                  |       |
|---|------------------|-------|
| 1. Staff updates  | Maintenance & LE | 9:30  |
| 2. 2013 Park Goals for San Mateo                                      |                  | 9:35  |
| 3. Dog Plan Update / Safety Issues – SFSPCA training                  | Shirwin          | 9:45  |
| 4. Radio Service – Discussion of coverage problems                    | Bert Carlson     | 9:55  |
| 5. Species of the Year events   | Susie            | 10:05 |
| 6. Newsletter – proposal for community updates                        |                  | 10:10 |
| 7. Wayfinding signage and access – Task Agreement, countywide         |                  | 10:20 |
| 8. Sweeney Ridge / Sneath Lane trailhead – Final Design               |                  | 10:25 |
| 9. Rancho   |                  |       |
| o Volunteer projects – What we’ve been up to, what is planned         |                  | 10:30 |
| o Equestrian leases – Update on long-term planning                    |                  | 10:45 |
| o Cabrillo Unified School District – Status of proposed land exchange |                  | 10:50 |
| 10. Open Discussion   |                  |       |

#### Next month

- o Rancho trailheads
- o Fire management / 2013 mowing plan
- o Portola Discovery planning

Summary of PAST Action Items (completed, outstanding)

Action Items		Assigned	Due	Completed (verified by CC)	
1.	Coordinate with SF Archdiocese re: Milagra & Rancho boundary	Susie	7/28/12	Susie coordinating with Ranger Lewis	
2.	Install vehicle barricades at Milagra	Mike	7/31/12	See above	
3.	Prepare engagement strategy matrix	CC (with team)	9/27/12	Draft prepared 12/6	
4.	Rancho French broom removal	Susie	9/27/12	Removed 12/14 & 1/10	
5.	Coordinate wildlife education at Rancho (birds)	Susie	9/27/12	discuss with Raptor Observatory	
6.	Explore video camera use for vandalism/dumping	Randy	10/25/12	Do not currently have \$, will continue to pursue	
7.	Print padmaps	Christine	11/13/12		
8.	Provide orientation to Ranger Lewis	Mike & CC	11/28/12	11/28/12	✓
9.	Update workplans monthly, and meet with Christine to discuss	All Divisions	11/30/12	12/19/12	✓
10.	Investigate digging at Park/Alamo	Rachel	12/31/12		
11.	Submit budget workplans to Hilary for equestrian lease revenue	Steve, Mike, Christine, Susie	12/31/12		
12.	Finalize Caltrans wetland agreement and revisit Skyridge HOA \$	Alison	12/31/12	Susie met with Caltrans Nov 2011	
13.	Identify Rancho volunteer projects	Christine, Mike, Susie, Galena	12/31/13	1/10/13	✓
14.	Provide Daly City with visitor amenities guidelines for Mussel Rock	Christine	12/31/12	Guide still being finalized	
15.	Bring Phleger signage to Sign Committee	Mike	1/24/13	Sign committee canceled for January	
16.	Coordinate with PG&E on vegetation removal and planting at Phleger	Susie	2/28/13		
17.	Determine management agreement with Daly City for Mussel Rock	Nancy	2/28/13		
18.	Work with ETRAC on horse tie locations at Sweeney	Christine & Mike	2/28/13		
19.	Prepare PMIS for 250 <sup>th</sup> Portola Discovery Site	CC, Steve, George, Interp	2013	Meeting scheduled for 1/22	
20.	Present Stewardship 3-year plan to Team	Sue G.	2013		

## San Mateo Team

### 2/28/13 Agenda

9:30 – 11am

Building 201 Fort Mason, Golden Gate Room

1. Newsletter – draft for approval/printing 9:30
2. Sweeney Ridge Nike Base buildings 9:35
3. Milagra – trail map revision on info kiosk 9:45
4. Unigrid update 9:50
5. Rancho
  - o Volunteer projects – March 2 kick-off 10:00
  - o Fire management / mowing 10:05
  - o Trails and Trailheads 10:15
6. Open Discussion 10:45

Summary of PAST Action Items (completed, outstanding)

Action Items	Assigned Staff	Due Date	Completion Date (verified by Christine)	
1. Coordinate SM workplans with Parkwide Goals	Christine (& M. Savidge)	3/1/13		
2. Invite staff to dog safety training	Shirwin	3/4/13	Maint 1/23, Trails 2/27, All staff date TBD	
3. Upload radio map on Sharepoint	Paul	3/1/13		
4. Prepare newsletter for Rancho	Christine	3/1/13	Draft completed, waiting for approval	
5. Prepare Rancho trail plan	Corbett	2/28/13	Assessments complete	
6. Volunteer Day at Rancho 3/2	Christine, Susie, Corbett	3/2/13		
7. Schedule equestrian planning meeting with management	Hilary	3/1/13		
8. Coordinate Phleger helicopter access with Bill Merkle	Chad	2/28/13		
9. Discuss DCS data collection for SM	Kevin/Christine	2/28/13		
10. Wildlife (bird) education - Rancho	Susie	9/27/12	discuss with Raptor Obs.	
11. Explore video camera use for vandalism/dumping	Randy	10/25/12	Do not currently have \$, will continue to pursue	
12. Print padmaps	Christine	11/13/12	Hold - trails plan update	
13. Submit budget workplans to Hilary for equestrian lease revenue	Steve, Mike, Christine, Susie	12/31/12		
14. Finalize Caltrans wetland agreement and revisit Skyridge HOA \$	Alison	12/31/12	Susie met with Caltrans Nov 2011	
15. Provide Daly City with visitor amenities guidelines for Mussel Rock	Christine	12/31/12	Guide still being finalized	
16. Determine management agreement with Daly City for Mussel Rock	Nancy	2/28/13		
17. Work with ETRAC on horse tie locations at Sweeney	Christine & Mike	2/28/13		
18. Prepare PMIS for 250 <sup>th</sup> Portola Discovery Site	CC, Steve, George, Interp	2013	Met 1/22 to prep	
19. Present Stewardship 3-year plan	Sue G.	2013		

## San Mateo Team

### 4/25/13 Agenda

9:30 – 11am

Building 201 Fort Mason, Golden Gate Room

1. Phleger – Miramontes Trail repair complete
2. Rancho updates
  - Efforts to stop off-road vehicles – Maintenance, LE, Communications
  - Visitor amenities – benches
  - Signage & Dogs
  - PG&E – SUP for pole replacement, work begins in June
3. Fire Management – Wendy Poinot
  - Overview of FMP Update
  - WUI Project Areas
  - Outreach Schedule
  - IDT
4. Property updates
  - Driscoll – no acquisition
  - Gypsy Hill – Priority Conservation Area
  - West Cattle Hill – auction June
5. Upcoming events
  - 5/5 Parks Alive! Streets Alive! – Quarry Park
  - 5/19 Mori Point CRLF Species of Year celebration
  - Next Rancho volunteer day - August

# San Mateo Team

## 7/25/13 Agenda

9:30 – 11am

Building 201 Fort Mason, Golden Gate Room

1. Regional updates
  - Devil's Slide
  - Peninsula Working Group – interagency efficiency
2. Priority Conservation Areas – 3 grant applications submitted
  - Milagra Ridge: Milagra-Battery Trail
  - Phleger Estate: Skyline Trail
  - Pedro Point: South Ridge connector trail
3. Rancho
  - Dog update – on-leash regulations, County Parks discussions
  - Mowing – August 1
  - PG&E – Work started on veg clearing & utility replacement
  - Encroachments
  - Neighborhood watch & cameras
  - Pesticides at Cabrillo Farms
  - Equestrian projects – update from Hilary
4. Pacifica updates
  - Interviews for GGNRA Liaison Committee
  - Calera Parkway
5. Upcoming events
  - 8/24 Geology Hike at Rancho
  - 8/24 Montara Volunteer Day
  - 9/7 Sweeney Volunteer Day – painting
  - 9/21 Coastal Clean-up Day – team meeting!

## San Mateo Team

### 8/22/13 Agenda

9:30 – 11am

Building 201 Fort Mason, Golden Gate Room

- |   |               |
|---|---------------|
| 1. PG&E Projects  | 9:30am        |
| • Rancho - Montara Utility Lines / Permit Violations    |               |
| • Rancho – Martin Transmission Line Vegetation Clearing |               |
| • Sweeney - Vegetation Clearing                         |               |
| • Future Communication Strategy                         |               |
| 2. Dog Planning with San Mateo County                   | 9:40am        |
| 3. FY 14 Workplan Goals, Objectives & Priorities        | 9:45am – 11am |

#### Upcoming events

- 8/24 Geology Hike at Rancho
- ~~8/24~~ Montara Volunteer Day TBD
- ~~9/7~~ Volunteer Day – ~~Sweeney painting~~ TBD due to lead paint
- 9/21 Coastal Clean-up Day – team meeting!
- 9/28-9/29 Pacifica Fog Fest

## **Dog Management Project Schedule 2013 - 2015**

**May 2013:** Brief Congressional delegation

**June 2013:** Supplemental EIS released for public comment (90 days – with public meetings)

**June 2014:** Notice of Proposed Rulemaking published for public comment (60 days)

**April 2015:** Final EIS published

**June 2015:** Record of Decision published

**July 2015:** Final rule published

## **Dog Management Project Schedule 2013 - 2015**

**May 2013:** Brief Congressional delegation

**Fall 2013:** Supplemental EIS released for public comment (90 days – with public meetings)

**Fall 2014:** Notice of Proposed Rulemaking published for public comment (60 days)

**Summer 2015:** Final EIS published

**Fall 2015:** Record of Decision published

**Winter 2015:** Final rule published

DATE: January 10, 2014  
FROM: Frank Dean, General Superintendent, Golden Gate National Recreation Area, 415  
561-4720  
SUBJECT: Dog Management Plan for Golden Gate NRA

This memorandum is to inform the Secretary about the dog management planning process at Golden Gate National Recreation Area, with emphasis on issues affecting the district of Rep Jackie Speier, D-CA-14th.

## **BACKGROUND**

- The purpose of the GOGA dog management planning process is to provide a clear, enforceable implementation plan for dog use in appropriate areas of the park, with a focus on safe and diverse visitor experiences, while protecting park resources.
- The draft Plan/Supplemental EIS (draft plan/SEIS) was released on September 6, 2013 for review, initially for a 90-day comment period that has since been extended to February 18, 2014. This is the second draft; the first was issued in January 2011, and received over 8000 comments in 4713 pieces of correspondence.
- The plan proposes to allow regulated off leash dog walking in seven prime areas within GGNRA (two within Rep Speier's district), while seeking to strike a balance between many diverse user groups and protecting park resources. GGNRA is the only one of 400 plus NPS park units to propose legally allowing this use.
- In one area of Rep Speier's district, Rancho Corral de Tierra, the preferred alternative does not include any areas for off leash use. This area was added to GOGA in December 2011; previous to that, the site had been used illegally for off leash dog walking for many years.
- Adjacent state parks do not allow off leash dog use, and adjacent county parks prohibit dog walking completely.
- In January 2012, an NPS ranger used a Taser on a local resident walking his dogs off leash at Rancho Corral de Tierra, after the resident refused to provide identification and attempted to leave the scene multiple times, despite orders not to do so. The ranger was exonerated, but the incident led to much community antagonism, which the park has worked hard to address.
- Rep Speier has publicly expressed disappointment that the park has not accommodated the desires of the vocal dog advocates for more off leash areas in San Francisco and San Mateo Counties, especially at Rancho Corral de Tierra.

## **DISCUSSION**

- The NPS-wide pet regulation (36 CFR §2.15) requires dogs to be restricted by cage or leash.
- As a result of a federal court decision, currently dogs are permitted off in many areas of the park. The park's plan has been controversial since its inception 12 years ago because it proposes substantially reducing the areas where dogs can be off leash.

- The areas of contention include most of the park's most highly prized visitor destinations. Dog groups claim they only want to use a small percentage of the park, but the areas they want for off leash use are also in demand by all visitors.
- At Fort Funston in Rep Speier's district- the park's most popular dog use area- the park proposes two large areas for off leash dog use, a larger area than initially proposed in the first draft.
- Off leash dog walking stakeholders are highly organized in their opposition to the plan, and have hired attorneys. They consistently seek the intervention of elected officials and would prefer that NPS be removed from the decision process.
- Other stakeholders are supportive of the park's attempt to assure that a wide range of uses can safely occur. These stakeholders include those interested in protecting wildlife and plants, advocates for children, seniors, and people with disabilities, and individuals who have been displaced due to their discomfort with off leash dog walking. These stakeholders represent an increasingly large percentage of those submitting comments on the draft dog management plan.
- The park held 4 public meetings on the first draft plan, and has held 3 public meeting on the supplemental draft plan. Neither Rep Speier nor her staff attended any of these latter meetings.

## **NEXT STEPS**

- Rep Speier is proposing to host a public forum in San Francisco on January 30 to allow the public to air concerns and ask questions of NPS and key stakeholder groups. NPS will attend, listen, and respond.
- Review of comments from Supplemental DEIS released for public comment – Winter-Fall, 2014.
- Notice of Proposed Rulemaking released for public comment – Fall 2014
- Notice of Availability of FEIS – Summer 2015
- Record of Decision published – Fall 2015
- Publish final special regulation – Winter 2015

## **ATTACHMENTS**

Maps of the preferred alternative for areas in Rep Speier's district are attached.

**Golden Gate National Recreation Area**  
**DOG MANAGEMENT**  
**Draft Plan/ Supplemental Environmental Impact Statement**

**Frequently Asked Questions**  
**September 6, 2013**

**1. What are the goals of the draft Plan/SEIS?**

- Provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park
- Provide a variety of visitor experiences, improve visitor and employee safety, and reduce user conflicts
- Promote the preservation and protection of natural and cultural resources and natural processes;  
Maintain park resources and values for future generations.

**2. Where can I view the draft Plan/SEIS, and how can I submit comments?**

Go to the NPS Planning, Environment and Public Comment (PEPC) website at <http://parkplanning.nps.gov/dogplan> to review and comment online.

Copies of the plan are also available at libraries in San Francisco, Marin and San Mateo Counties, and the East Bay (full list at [www.nps.gov/goga/seis.htm](http://www.nps.gov/goga/seis.htm)).

The draft plan/SEIS is available for review and comment for 90 days – September 6 through midnight Mountain Time (11 p.m. Pacific Time) December 4, 2013.

Comments may be submitted:

- Online at <http://parkplanning.nps.gov/dogplan>; or
- By mailing/delivering comments to Frank Dean, General Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123-0022.
- By attending one of the public open-house meetings in early November (listed at <http://parkplanning.nps.gov/dogplan> and at [www.nps.gov/goga/seis.htm](http://www.nps.gov/goga/seis.htm))

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

[Add caution on cant guarantee personal info; may be publicly available as part of comment](#)

[Add new Q/A on why personal info cant be protected.](#)

### 3. Why has GOGA developed a second EIS for dog management?

The park received 4,713 individual pieces of correspondence on the first draft EIS (DEIS) for dog management that was released in January 2011. That correspondence contained 8,000 substantive comments. This draft Plan/SEIS is a second draft EIS that responds to the substantive comments on the DEIS and includes analysis of dog management for the newest area of the park, Rancho Corral de Tierra. Because of the amount of new information and analysis, the entire document has been reissued. There is a reading guide to help direct readers to the substantive changes to the DEIS.

**Commented [WS1]:** Where do they find that reading guide?

The current situation with dog management in the park is confusing and has led to controversy and conflicts. The park intends to develop a final plan for dog management that is understandable, enforceable, provides a variety of visitor experiences and protects resources.

In this second public comment phase of the dog management project, we need to hear from a broad range of users as to whether the preferred alternative in the SEIS adequately provides a range of visitor experiences while protecting park resources within this national park system unit.

### 4. What's in the draft Plan/SEIS?

The plan includes six management alternatives, one of which is the park's preferred alternative, for 22 areas of the park. These 22 areas include all the major areas where dog walking currently occurs and essentially lays out the future for where and how dog walking will occur parkwide.

**Commented [WS2]:** Know these are just for internal use, but I'd move up the Q&A #14 that explains the preferred alt to come after this mention

### 5. What are the key changes between the 2011 version of the plan and this current SEIS?

The Supplemental EIS:

- Incorporates new data
- Considers additional research
- Makes some changes to the impacts analysis
- Changes the management strategy to accentuate monitoring and eliminate automatic triggers
- Evaluates fencing as a tool to manage dog impacts
- Makes changes to the preferred alternative at several sites, and includes site specific alternatives and analysis for Rancho Corral de Tierra in San Mateo County, which wasn't part of the park when the January 2011 draft plan came out.

### 6. Does the draft Plan/SEIS ban dogs from the park?

No. The dog management planning process dismissed alternatives banning dogs from the park as not meeting the purpose of the planning effort. The range of alternatives in the

Plan/SEIS permits dog walking, both on leash and under voice control, in many areas of the park. The preferred alternative includes 7 areas, including beaches, where dogs may be walked off leash under voice control and 22 park sites with areas (beaches, trails and grassy areas) open to on-leash.

**7. Are there any other national park areas that allow off leash dog walking?**

No. The national NPS regulation on dogs states that where they are permitted in parks, they must be on leash.

In 2002, a panel of senior NPS officials concluded that because of the special circumstances at Golden Gate, it is appropriate for the park to consider a range of alternatives that includes off leash dog walking in areas that meet certain criteria.

**8. Was there public input in the development of the plan?**

Yes. The plan is informed by the input of thousands of people over a 12-year period. Public involvement took the form of numerous public meetings, written comments, stakeholder presentations and discussions, and a federal negotiated rulemaking process. Most recently, the draft Plan/DEIS was open for public comment for 5.5 months and the park received over 4700 pieces of correspondence. Additional input came from senior NPS management at the regional and national level, with specialized expertise in resources and park management.

[ADD Q/A – Why has this taken 12 years?](#)

[ADD Q&A – How much has the NPS spent on this dog walking rule?](#)

**9. Will the NPS really give consideration to public comment on the draft Plan/SEIS?**

Yes. Every substantive comment will be carefully considered in developing a final plan. Without exception, every draft EIS released by the park since it was established in 1972 was refined and improved as a result of public comment.

**10. The draft Plan/SEIS is very long. Do I have to read the entire document?**

No. We have prepared a Reader’s Guide to reviewing the plan, which will direct you to the sections that have changed since the first draft EIS. There is also a short Executive Summary of the plan, which is in the first 28 pages of the document. If you’re interested in a particular area, see the index listings for Chapter 2 for descriptions of the alternatives and then go to the listing of alternative maps to see the alternatives for each site(s).

**11. Is the draft Plan/SEIS the final dog walking regulation for GGNRA?**

No. The draft Plan/SEIS is an assessment of the environmental impacts of a range of management alternatives, including the NPS Preferred Alternative. After review of public

comment on the draft Plan/SEIS and any resulting changes, a notice of proposed rulemaking, based on the preferred alternative of the draft Plan/SEIS and any changes resulting from public comment, will be published for additional public comment. After consideration of the relevant comments on the proposed rule, and after publication of the final Plan/EIS and Record of Decision, the NPS will publish a final rule, which is anticipated in late 2015.

**Commented [WS3]:** Do you need this phrase?

## ADDITIONAL BACKGROUND QUESTIONS

### 12. Does the draft Plan/SEIS address all lands within the boundary of GGNRA?

~~The draft Plan/SEIS addressed only lands that are owned and managed by GGNRA. It does not directly address lands within the park boundary managed by other agencies such as the Presidio Trust, Point Reyes National Seashore or the San Francisco Public Utility Commission.~~

The draft Plan/SEIS addresses dog walking in 22 specific areas within the GOGA boundary that are managed by the park. Other GGNRA owned and managed lands within the park boundary that are not directly addressed in this draft Plan/SEIS will continue to be governed by the existing NPS regulation for dog walking, 36 CFR 2.15 which requires dogs to be kept on a leash where they are allowed.

The draft Plan/SEIS does not directly address lands within the park boundary managed by other agencies such as the Presidio Trust, Point Reyes National Seashore or the San Francisco Public Utility Commission.

### 13. How were those 22 specific areas chosen for inclusion in the draft Plan/SEIS?

Initially, 21 park areas were developed by the NPS as the parameters for discussion of dog management by the GGNRA Negotiated Rulemaking Committee for Dog Management, an initial attempt to develop a new dog walking regulation for the park with direct input from stakeholder groups. The parameters set the limits for discussion, by identifying, up front, areas that would be open to consideration for on-leash dog walking, and areas open to consideration for dog walking under voice control, and areas that would not be open to consideration for dog walking. Development of the parameters was guided by a panel of senior NPS officials who, in 2002, recommended the following to the GOGA General Superintendent:

*“The panel concludes that off-leash dog walking in GOGA may be appropriate in selected locations where resource impacts can be adequately mitigated and public safety incidents and public use conflicts can be appropriately managed. The panel further recommends that the park pursue both rulemaking and comprehensive planning for pet management to address suitable locations and proper management strategies.”*

An additional area, Rancho Corral de Tierra, was added in this draft Plan/SEIS. That site transferred to the park ~~when after~~ the first draft Plan and EIS had already been completed. The SEIS provides the opportunity to address that new property.

### 14. What is a Preferred Alternative?

A preferred alternative is the alternative in an EIS which the NPS believes would best accomplish the purpose and need of the proposed action while fulfilling its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors. 43 CFR 46.4.20(d).

The preferred alternative in the draft Plan/SEIS includes the following key elements:

- On-leash and/or voice-control dog walking in certain, specific areas of the park where impacts on visitor experience and safety and sensitive resources were minimal,
- No dogs in areas of the park where impacts were unacceptable and could not be mitigated,
- The commercial dog walking recommendation from the Negotiated Rulemaking Committee,
- A monitoring-management strategy to guide a range of park responses to non-compliance,
- Permits for private or commercial dog walkers who wish to walk more than three dogs, with a limit of 6, in seven specific areas of the park.

#### 15. What are the current rules governing dog management at GOGA?

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

- NPS federal regulation (36 CFR 2.15) — requires that dogs be on leash wherever dog walking is permitted in an NPS area,
- GOGA Citizen Advisory Commission’s 1979 Pet Policy — provisions for off-leash dog walking in certain areas of GOGA, which were never formalized as a federal regulation. This aspect of current park management is the result of the 2005 federal court decision *US v. Barley* (405 F. Supp.2d 1121 (N.D. CA 2005)),
- NPS special regulation for protection of western snowy plovers on Ocean Beach and the WPA at Crissy Field (36 CFR 7.97(d)), and
- GGNRA Compendium (compilation of park-specific rules).

**Commented [WS4]:** ADD a Q/A about how that was allowed to happen – since later Q21 -- it says the park adopted the policy for over 20 years

#### 16. What is the 1979 Pet Policy?

The GGNRA Citizen’s Advisory Commission’s 1979 Pet Policy recommended to the park that certain, specific areas of GOGA be open to off-leash voice control dog walking. Although never formalized as a federal regulation by the NPS, this unofficial pet policy was in place within GOGA for more than 20 years.

#### 17. Why doesn’t GGNRA simply adopt the 1979 Pet Policy as its dog management regulation?

Conditions within the park have changed significantly since 1979; increased visitation, addition of park areas and increased knowledge of resources within the park must be taken into consideration in the development of any dog management regulation. An NPS rule must also be consistent with applicable statutory requirements, such as the

National Environmental Policy Act and the Endangered Species Act; the 1979 Pet Policy was developed without any environmental analysis. In addition, the draft dog management plan/SEIS found that accepting the 1979 Pet Policy in its entirety would not meet the purpose and need of the plan (stated previously); therefore, formalizing the Pet Policy as the dog management regulation was considered but dismissed.

**18. What are the concerns about current off-leash dog walking in GGNRA?**

Although the 1979 policy and current park information state that dogs off-leash in the park must be under control, the park has no legally-enforceable voice-control guidelines governing off-leash behavior, and currently many off-leash dogs are not well-controlled by their walkers. Uncontrolled, off-leash dogs create safety issues for park visitors and staff, other dogs, and are a source of conflict between dog walkers and other user groups.

Commented [WS5]: Right?

**19. What is the definition of voice and sight control dog walking that would be required under a new GGNRA dog walking regulation?**

As defined in the draft Plan/SEIS, voice and sight control means that dogs must be within direct eyesight of the dog walker, and that dog walkers must be able to immediately recall their dog(s) to their side so that a leash can be attached to the dog(s)'s collar, and shall demonstrate this ability when requested by Law Enforcement personnel. This definition is similar to other land management agencies that allow off-leash dog walking.

**20. What are the concerns about off-leash dog walking in GGNRA?**

The main concerns that the park has about off-leash dog walking relate to public and staff safety, compatibility with other user groups and potential resource impacts.

**21. Why does the GGNRA draft Plan/SEIS treat dog walking differently than other areas of the National Park Service?**

As described in the November 2002 Federal Panel Recommendation to the General Superintendent on Proposed Rulemaking for Pet Management at GGNRA, the park has a unique set of characteristics: sites which had historically been used for off-leash dog walking; the 1979 Citizen's Advisory Commission Pet Policy that recommended the continuation of those uses, and the park's adoption of that policy for over 20 years; management of a significant portion of the public recreational open space in San Francisco and San Mateo and Marin Counties, where residents rely on portions of that open space for exercise of their pets.

Because of these unique characteristics, the park considered a range of alternatives intended to provide a variety of experiences, including voice control dog walking, while protecting visitor experience and safety and park resources.

**22. GGNRA is a national recreation area. Do national recreation areas have different management policies than national parks?**

No. All units of the National Park System are guided by the same NPS Management Policies, regardless of the park's designation. Congress amended the 1916 NPS Organic Act in 1970 to make clear that the NPS must manage all units of the national park system to the same preservation standard.

**23. What is "Negotiated Rulemaking," and why did GOGA use this form of rulemaking from 2006-2007 as a preliminary step in the dog management planning process?**

Negotiated Rulemaking is one way that federal agencies can use to develop rules; this method requires the formal involvement of key stakeholders, along with the agency. Given the longstanding and passionate interest that various stakeholders have in this issue, and because GGNRA has a deep tradition of community engagement, the park saw value in working in partnership with stakeholders who have diverse values and views to try and develop a rule for dog management through consensus. The Committee was formed with the approval of the Secretary of the Interior to develop consensus recommendations for both voice-control and on-leash dog walking, as well as for use and limits of professional dog walking.

**24. What was the outcome of the Negotiated Rulemaking Committee for Dog Management and how will recommendations of the Committee be used by the NPS?**

The Committee worked from March 2006 to the end of October 2007, but after many meetings and working sessions was unable to reach consensus on a proposed rule for all areas open for discussion. However, there was consensus on overarching guidelines for dog management and commercial dog walking as well as for a management option for one site – Oakwood Valley. All these areas of consensus have been included in two of the alternatives in the draft Plan/SEIS, and two are included in the NPS preferred alternative. Although the Committee was unable to reach consensus on a full rule, the many meetings of the Committee provided much information that aided the NPS in the development of the Plan/DEIS.

**25. What should people consider when they comment on the draft Plan/SEIS?**

The NPS is looking for substantive comments from the public after review of the range of alternatives, including the preferred alternative, and the impacts of those alternatives. Examples of substantive comments include providing additional factual information, noting issues or impacts NPS may have failed to consider, inconsistencies, and other comments of substance, as opposed to comments voicing like or dislike without an underlying rationale.

**26. Once a final rule is issued, how will it be enforced?**

The park will enforce the final rule as it does all other rules. The park will depend on the active involvement of user groups to support implementation of the rule by assisting in education and outreach to their members.

# Golden Gate National Recreation Area

## DOG MANAGEMENT

### Draft Plan/ Supplemental Environmental Impact Statement

#### Frequently Asked Questions

September 6, 2013

#### 1. What are the goals of the draft plan/SEIS?

The current situation with dog management in the park is confusing and has led to controversy and conflicts. The park's overall dog management goal is to develop a new regulation for dog management that is understandable, enforceable, provides a variety of visitor experiences and protects resources.

#### 2. Where can I view the draft plan/SEIS, and how can I submit comments?

Go to the NPS Planning, Environment and Public Comment (PEPC) website at <http://parkplanning.nps.gov/dogplan> to review and comment online.

Copies of the plan are also available at libraries in San Francisco, Marin and San Mateo Counties, and the East Bay (full list at [www.nps.gov/goga/seis.htm](http://www.nps.gov/goga/seis.htm)).

The draft plan/SEIS is available for review and comment for 90 days; September 6 until midnight Mountain Time (**11 p.m. Pacific Time**), December 4, 2013.

Comments may be submitted:

- Online at <http://parkplanning.nps.gov/dogplan>; or
- By mail or other delivery to Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123, Attn: Dog Management SEIS
- By attending one of the public open-house meetings in early November (listed at <http://parkplanning.nps.gov/dogplan> and at [www.nps.gov/goga/seis.htm](http://www.nps.gov/goga/seis.htm))

Comments will not be accepted by fax, email, or in any other way than those specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted. Before including a personal address, phone number, e-mail address, or other personal identifying information in a comment, reviewers should be aware that the entire comment—including personal identifying information—may be made publicly available at any time. While reviewers can ask us in their comment to withhold their personal identifying information from public review, the NPS cannot guarantee that we will be able to do so.

For questions about commenting, call the Dog Management Information line (415-561-4728) and leave a message and call-back number. Park staff will respond to your call.

### **3. Why has GGNRA developed a second EIS for dog management?**

The park received 4,713 individual pieces of correspondence, containing 8,000 substantive comments, on the 2011 draft plan/EIS. This draft plan/SEIS responds to those substantive comments and includes analysis of dog management for the newest area of the park, Rancho Corral de Tierra. Because of the amount of new information and analysis, the entire document has been reissued. The draft plan/SEIS includes a Reader's Guide, available with the online version of the document, to help direct reviewers to the substantive changes in the document.

In this public comment phase, we need to hear from a broad range of users as to whether the preferred alternative in the draft plan/SEIS adequately provides a range of visitor experiences while protecting park resources within this unit of the national park system.

### **4. What's in the draft plan/SEIS?**

The plan includes six management alternatives, one of which is the park's preferred alternative, for 22 areas of the park. These 22 areas include all the major areas where dog walking currently occurs and essentially lays out the future for where and how dog walking will occur parkwide.

### **5. What is a Preferred Alternative?**

A preferred alternative is the alternative in an EIS which the NPS believes would best accomplish the purpose and need of the proposed action while fulfilling its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors. 43 CFR 46.4.20(d).

The preferred alternative in the draft plan/SEIS includes the following:

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### **6. What are the key changes between the 2011 draft plan/EIS and this draft plan/SEIS?**

- Addition of new data
- Consideration of additional research

- Some changes to the impacts analysis
- Changes to the management strategy to accentuate monitoring and eliminate automatic triggers
- Evaluation of fencing as a tool to manage dog impacts
- Changes to the preferred alternative at several sites
- Site specific alternatives and analysis for Rancho Corral de Tierra in San Mateo County, which was not part of the park when the draft plan/EIS was developed.

**7. Does the draft plan/SEIS ban dogs from the park?**

No. The dog management planning process dismissed alternatives banning dogs from the park as not meeting the purpose of the planning effort. The range of alternatives in the draft plan/SEIS permits dog walking, both on leash and off-leash under voice control, in many areas of the park. The preferred alternative includes 7 areas, including beaches, where dogs may be walked off-leash under voice control and 22 park sites with areas (beaches, trails and grassy areas) open to on-leash.

**8. Are there any other national park areas that allow off leash dog walking?**

No. The national NPS regulation on dogs states that where dog walking is permitted in parks, dogs must be on leash.

In 2002, a panel of senior NPS officials concluded that because of the special circumstances at Golden Gate, it is appropriate for the park to consider off-leash dog walking in areas that meet certain criteria.

**9. Was there public input in the development of the plan?**

Yes. The plan is informed by the input of thousands of people over a 12-year period. Public involvement took the form of numerous public meetings, written comments, stakeholder presentations and discussions, and a federal negotiated rulemaking process. Most recently, the draft plan/EIS was open for public comment for 5.5 months and the park received over 4700 pieces of correspondence. Additional input came from senior NPS management at the regional and national level, with specialized expertise in resources and park management.

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## ADDITIONAL BACKGROUND QUESTIONS

### 13. Does the draft plan/SEIS address all lands within the boundary of GGNRA?

The draft plan/SEIS addresses dog walking in 22 sites of the approximately 20,000 acres within the GGNRA boundary that are managed by the park. It does not address lands within the park boundary managed by other agencies such as the Presidio Trust, Point Reyes National Seashore or the San Francisco Public Utility Commission.

Other GGNRA managed lands within the park boundary that are not specifically covered in this draft plan/SEIS will continue to be governed by the existing NPS regulation for dog walking, 36 CFR 2.15 which requires dogs to be kept on a leash where they are allowed.

### 14. How were those 22 specific areas chosen for inclusion in the draft plan/SEIS?

Initially, 21 park areas were developed by the NPS as the parameters for discussion of dog management by the GGNRA Negotiated Rulemaking Committee for Dog Management, an initial attempt to develop a new dog walking regulation for the park with direct input from stakeholder groups. The parameters set the limits for discussion, by identifying, up front, areas that would be open to consideration for on-leash dog walking, areas open to consideration for dog walking off-leash, under voice control, and areas that would not be open to consideration for dog walking. Development of the parameters was guided by a panel of senior NPS officials who, in 2002, recommended the following to the park's General Superintendent:

*“The panel concludes that off-leash dog walking in GGNRA may be appropriate in selected locations where resource impacts can be adequately mitigated and public safety incidents and public use conflicts can be appropriately managed. The panel further recommends that the park pursue both rulemaking and comprehensive planning for pet management to address suitable locations and proper management strategies.”*

An additional area, Rancho Corral de Tierra, was added in this draft plan/SEIS. That site transferred to the park when the draft plan/EIS had already been completed. The draft plan/SEIS provides the opportunity to specifically address that new property.

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management is the result of the 2005 federal court decision *US v. Barley* (405 F. Supp.2d 1121 (N.D. CA 2005)),

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Conditions within the park have changed significantly since 1979; increased visitation, addition of park areas and increased knowledge of resources within the park must be taken into consideration in the development of any dog management regulation. An NPS rule must also be consistent with applicable statutory requirements, such as the National Environmental Policy Act and the Endangered Species Act. However, the 1979 Pet Policy was developed without any environmental analysis. In addition, the draft plan/SEIS found that accepting the 1979 Pet Policy in its entirety would not meet the purpose and need of the plan; therefore, formalizing the Pet Policy as the dog management regulation was considered but dismissed.

#### **18. What are the concerns about current off-leash dog walking in GGNRA?**

Although the 1979 Pet Policy and current park information state that dogs off-leash in the park must be under control, the park has no legally-enforceable voice-control guidelines governing off-leash behavior, and currently many off-leash dogs are not well-controlled by their walkers. Uncontrolled, off-leash dogs create safety issues for park visitors, staff, and other dogs, and are a source of conflict between dog walkers and other user groups.

#### **19. What is the definition of voice and sight control dog walking that would be required under a new GGNRA dog walking regulation?**

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**20. Why does the GGNRA draft plan/SEIS treat dog walking differently than other areas of the National Park Service?**

The November 2002 Federal Panel Recommendation to the General Superintendent on Proposed Rulemaking for Pet Management at GGNRA noted that the park has a unique set of characteristics. Those characteristics are: sites which had historically been used for off-leash dog walking; the GGNRA Citizen's Advisory Commission 1979 Pet Policy that recommended the continuation of those uses, and the park's adoption of that policy for over 20 years; and management of a significant portion of the public recreational open space in San Francisco and San Mateo and Marin Counties, where residents rely on portions of that open space for exercise of their pets.

Because of these unique characteristics, the park considered a range of alternatives intended to provide a variety of experiences, including voice control dog walking, while protecting visitor experience and safety and park resources.

**21. GGNRA is a national recreation area. Do national recreation areas have different management policies than national parks?**

No. All units of the national park system are guided by the same NPS Management Policies, regardless of the park's designation as a national park, national recreation area, national historic site, national lakeshore or other (there are 35 types of national park units). Congress amended the 1916 NPS Organic Act in 1970 to make clear that the NPS must manage all units of the national park system to the same preservation standard.

**22. What is "Negotiated Rulemaking," and why did GGNRA use this form of rulemaking from 2006-2007 as a preliminary step in the dog management planning process?**

Negotiated Rulemaking is one way that federal agencies can develop rules. This method requires the formal involvement of key stakeholders, together with the agency. Given the longstanding and passionate interest that various stakeholders have in this issue, and because GGNRA has a deep tradition of community engagement, the park saw value in working in partnership with stakeholders who have diverse values and views to try and develop a rule for dog management through consensus. The Committee was formed with the approval of the Secretary of the Interior to develop consensus recommendations for both voice-control and on-leash dog walking, as well as for use and limits of professional dog walking.

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dog management and commercial dog walking as well as for a management option for one site – Oakwood Valley. All these areas of consensus have been included in two of the alternatives in the draft plan/SEIS, and two are included in the NPS preferred alternative. Although the Committee was unable to reach consensus on a full rule, the many meetings of the Committee provided much information that aided the NPS in the development of the draft plan/SEIS.

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# Golden Gate National Recreation Area

## DOG MANAGEMENT

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### **6. What are the key changes between the 2011 draft plan/EIS and this draft plan/SEIS?**

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**8. Are there any other national park areas that allow off leash dog walking?**

No. The national NPS regulation on dogs states that where dog walking is permitted in parks, dogs must be on leash.

In 2002, a panel of senior NPS officials concluded that because of the special circumstances at Golden Gate, it is appropriate for the park to consider off-leash dog walking in areas that meet certain criteria.

**9. Was there public input in the development of the plan?**

Yes. The plan is informed by the input of thousands of people over a 12-year period. Public involvement took the form of numerous public meetings, written comments, stakeholder presentations and discussions, and a federal negotiated rulemaking process. Most recently, the draft plan/EIS was open for public comment for 5.5 months and the park received over 4700 pieces of correspondence. Additional input came from senior NPS management at the regional and national level, with specialized expertise in resources and park management.

**10. Will the NPS really give consideration to public comment on the draft plan/SEIS?**

Yes. Every substantive comment will be carefully considered in developing a final plan/EIS. Without exception, every draft EIS released by the park since it was established in 1972 was refined and improved as a result of public comment.

**11. The draft plan/SEIS is very long. Do I have to read the entire document?**

No. We have prepared a Reader's Guide to reviewing the plan, which will direct you to the sections that have changed since the draft plan/EIS. There is also a short Executive Summary of the plan, which is the first 28 pages of the document. If you're interested in

a particular area, see the index listings for Chapter 2 for descriptions of the alternatives and then go to the listing of alternative maps to see the alternatives for each site(s).

## **12. Is the draft plan/SEIS the final dog walking regulation for GGNRA?**

No. The draft plan/SEIS is an assessment of the environmental impacts of a range of management alternatives, including the NPS Preferred Alternative. After review of public comment on the draft plan/SEIS and any resulting changes to the preferred alternative, a Notice of Proposed Rulemaking will be published for additional public comment. After consideration of the relevant comments on the proposed rule, and after publication of the final plan/EIS and Record of Decision, the NPS will publish a final rule, which is anticipated in late 2015.

## **ADDITIONAL BACKGROUND QUESTIONS**

### **13. Does the draft plan/SEIS address all lands within the boundary of GGNRA?**

The draft plan/SEIS addresses dog walking in 22 sites of the approximately 20,000 acres within the GGNRA boundary that are managed by the park. It does not address lands within the park boundary managed by other agencies such as the Presidio Trust, Point Reyes National Seashore or the San Francisco Public Utility Commission.

Other GGNRA managed lands within the park boundary that are included in this draft plan/SEIS will continue to be governed by the existing NPS regulation for dog walking, 36 CFR 2.15 which requires dogs to be kept on a leash where they are allowed.

### **14. How were those 22 specific areas chosen for inclusion in the draft plan/SEIS?**

Initially, 21 park areas were developed by the NPS as the parameters for discussion of dog management by the GGNRA Negotiated Rulemaking Committee for Dog Management, an initial attempt to develop a new dog walking regulation for the park with direct input from stakeholder groups. The parameters set the limits for discussion, by identifying, up front, areas that would be open to consideration for on-leash dog walking, areas open to consideration for dog walking off-leash, under voice control, and areas that would not be open to consideration for dog walking. Development of the parameters was guided by a panel of senior NPS officials who, in 2002, recommended the following to the park's General Superintendent:

*“The panel concludes that off-leash dog walking in GGNRA may be appropriate in selected locations where resource impacts can be adequately mitigated and public safety incidents and public use conflicts can be appropriately managed. The panel further recommends that the park pursue both rulemaking and comprehensive planning for pet management to address suitable locations and proper management strategies.”*

An additional area, Rancho Corral de Tierra, was added in this draft plan/SEIS. That site transferred to the park when the draft plan/EIS had already been completed. The draft plan/SEIS provides the opportunity to address that new property.

#### **15. What are the current rules governing dog management at GGNRA?**

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

- NPS federal regulation (36 CFR 2.15) — requires that dogs be on leash wherever dog walking is permitted in an NPS area,
- GGNRA Citizen Advisory Commission’s 1979 Pet Policy — recommending off-leash dog walking in certain areas of GGNRA. This aspect of current park management is the result of the 2005 federal court decision *US v. Barley* (405 F. Supp.2d 1121 (N.D. CA 2005)),
- NPS special regulation for protection of western snowy plovers on Ocean Beach and the WPA at Crissy Field (36 CFR 7.97(d)), and
- GGNRA Compendium (compilation of park-specific rules).

#### **16. What is the 1979 Pet Policy?**

The GGNRA Citizen’s Advisory Commission’s 1979 Pet Policy recommended to the park that certain, specific areas of GGNRA be open to off-leash voice control dog walking. Although the park was never formalized this policy as a federal regulation, this unofficial pet policy was in place within GGNRA for more than 20 years.

#### **17. Why doesn’t GGNRA simply adopt the 1979 Pet Policy as its dog management regulation?**

Conditions within the park have changed significantly since 1979; increased visitation, addition of park areas and increased knowledge of resources within the park must be taken into consideration in the development of any dog management regulation. An NPS rule must also be consistent with applicable statutory requirements, such as the National Environmental Policy Act and the Endangered Species Act; the 1979 Pet Policy was developed without any environmental analysis. In addition, the draft plan/SEIS found that accepting the 1979 Pet Policy in its entirety would not meet the purpose and need of the plan; therefore, formalizing the Pet Policy as the dog management regulation was considered but dismissed.

#### **18. What are the concerns about current off-leash dog walking in GGNRA?**

Although the 1979 Pet Policy and current park information state that dogs off-leash in the park must be under control, the park has no legally-enforceable voice-control guidelines governing off-leash behavior, and currently many off-leash dogs are not well-controlled by their walkers. Uncontrolled, off-leash dogs create safety issues for park visitors, staff, and other dogs, and are a source of conflict between dog walkers and other user groups.

**19. What is the definition of voice and sight control dog walking that would be required under a new GGNRA dog walking regulation?**

As defined in the draft plan/SEIS, voice and sight control means that dogs must be within direct eyesight of the dog walker, and that dog walkers must be able to immediately recall their dog(s) to their side so that a leash can be attached to the dog(s)'s collar, and shall demonstrate this ability when requested by Law Enforcement personnel. This definition is similar to other land management agencies that allow off-leash dog walking.

**20. Why does the GGNRA draft plan/SEIS treat dog walking differently than other areas of the National Park Service?**

As described in the November 2002 Federal Panel Recommendation to the General Superintendent on Proposed Rulemaking for Pet Management at GGNRA, the park has a unique set of characteristics: sites which had historically been used for off-leash dog walking; the GGNRA Citizen's Advisory Commission 1979 Pet Policy that recommended the continuation of those uses, and the park's adoption of that policy for over 20 years; and management of a significant portion of the public recreational open space in San Francisco and San Mateo and Marin Counties, where residents rely on portions of that open space for exercise of their pets.

Because of these unique characteristics, the park considered a range of alternatives intended to provide a variety of experiences, including voice control dog walking, while protecting visitor experience and safety and park resources.

**21. GGNRA is a national recreation area. Do national recreation areas have different management policies than national parks?**

No. All units of the national park system are guided by the same NPS Management Policies, regardless of the park's designation as a national park, national recreation area, national historic site, national lakeshore or other (there are 35 types of national park units). Congress amended the 1916 NPS Organic Act in 1970 to make clear that the NPS must manage all units of the national park system to the same preservation standard.

**22. What is "Negotiated Rulemaking," and why did GGNRA use this form of rulemaking from 2006-2007 as a preliminary step in the dog management planning process?**

Negotiated Rulemaking is one way that federal agencies can develop rules; this method requires the formal involvement of key stakeholders, along with the agency. Given the longstanding and passionate interest that various stakeholders have in this issue, and because GGNRA has a deep tradition of community engagement, the park saw value in working in partnership with stakeholders who have diverse values and views to try and develop a rule for dog management through consensus. The Committee was formed with

the approval of the Secretary of the Interior to develop consensus recommendations for both voice-control and on-leash dog walking, as well as for use and limits of professional dog walking.

**23. What was the outcome of the Negotiated Rulemaking Committee for Dog Management and how will recommendations of the Committee be used by the NPS?**

The Committee worked from March 2006 to the end of October 2007 but, after many meetings and working sessions, was unable to reach consensus on a proposed rule for all areas open for discussion. However, there was consensus on overarching guidelines for dog management and commercial dog walking as well as for a management option for one site – Oakwood Valley. All these areas of consensus have been included in two of the alternatives in the draft plan/SEIS, and two are included in the NPS preferred alternative. Although the Committee was unable to reach consensus on a full rule, the many meetings of the Committee provided much information that aided the NPS in the development of the draft plan/SEIS.

**24. What should people consider when they comment on the draft plan/SEIS?**

The NPS is looking for substantive comments from the public after review of the range of alternatives, including the preferred alternative, and the impacts of those alternatives. Examples of substantive comments include providing additional factual information, noting issues or impacts NPS may have failed to consider, inconsistencies, and other comments of substance, as opposed to comments voicing like or dislike without an underlying rationale.

**25. Once a final rule is issued, how will it be enforced?**

The park will enforce the final rule as it does all other rules. But in addition, the park will depend on the active involvement of user groups to support implementation of the rule by assisting in education and outreach to their members.

## Overview

### Supplemental EIS for Dog Management (SEIS)

#### Why an SEIS?

Required to address significant and/or substantial changes from a DEIS. The changes must be responsive to substantive comment on the Draft Plan/DEIS.

#### Changes/New Information in the SEIS:

- Alt. (E) modified to include *all acceptable elements of the 1979 Pet Policy*, assuming compliance, education and enforcement components.
- Removed the programmatic **treatment for “New Lands”** - added *site-specific treatment* for new park site, Rancho Corral de Tierra.
- Supplemented visitor experience, health and safety impact topics with *new law enforcement and visitor use data*.
- Supplemented resource impact topics with *additional peer-reviewed studies*.
- Added results of OMB-approved *survey on potential re-distributional effects*.
- *Responded to ADA concerns* across all alternatives.
- *Compliance-based Management modified* - removed triggers that would automatically switch areas to more restrictive status upon reaching defined threshold of compliance.
- *Expanded monitoring* to include natural and cultural resources, providing basis for future management actions.
- *Adjusted dog walking access* in 4 sites in preferred alternative to address geographically logical access, visitor safety and crowding.
- *Added* fencing/barriers and time of use as *future management options* to protect resources.

## **Overview**

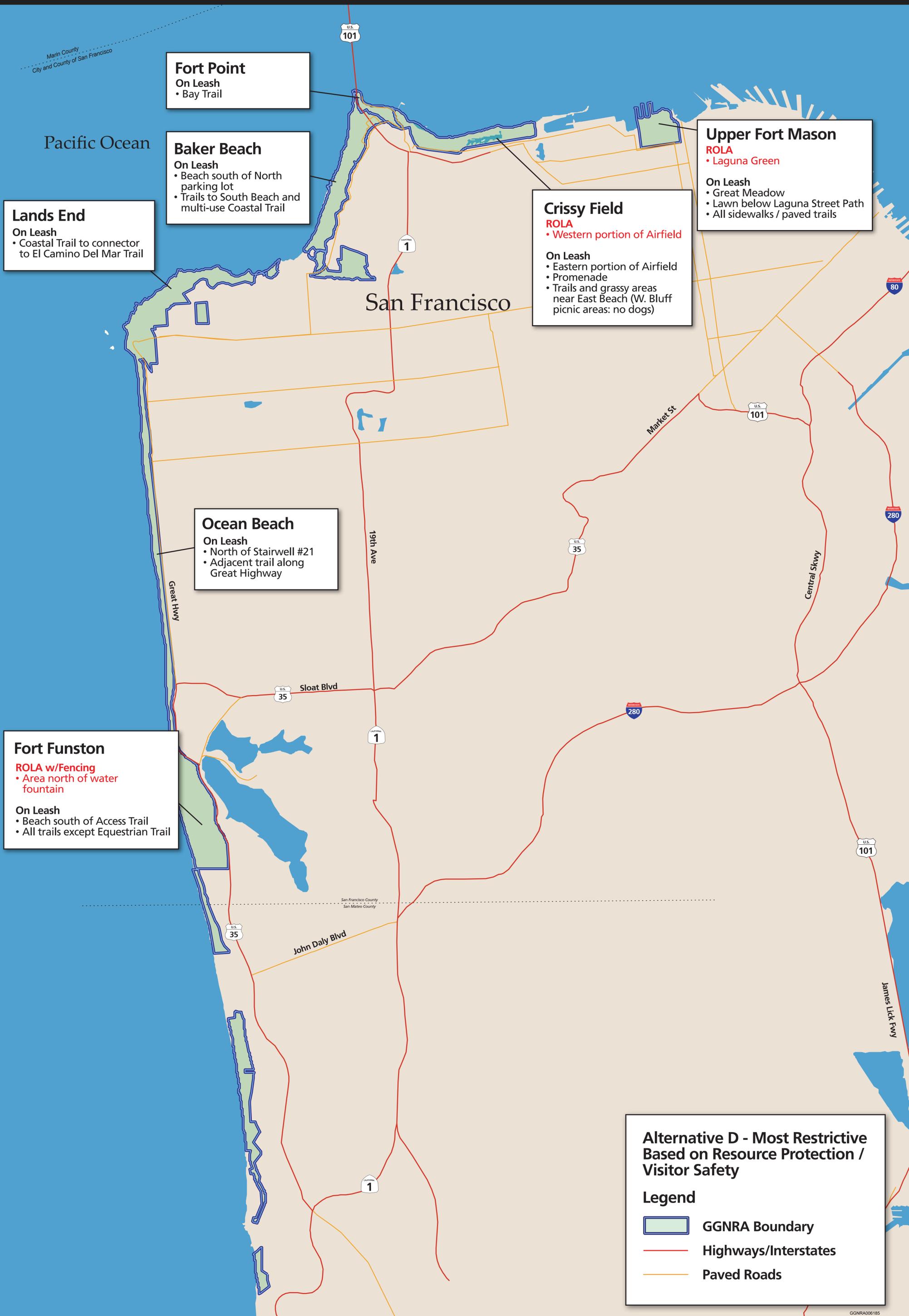
### **Supplemental EIS for Dog Management (SEIS)**

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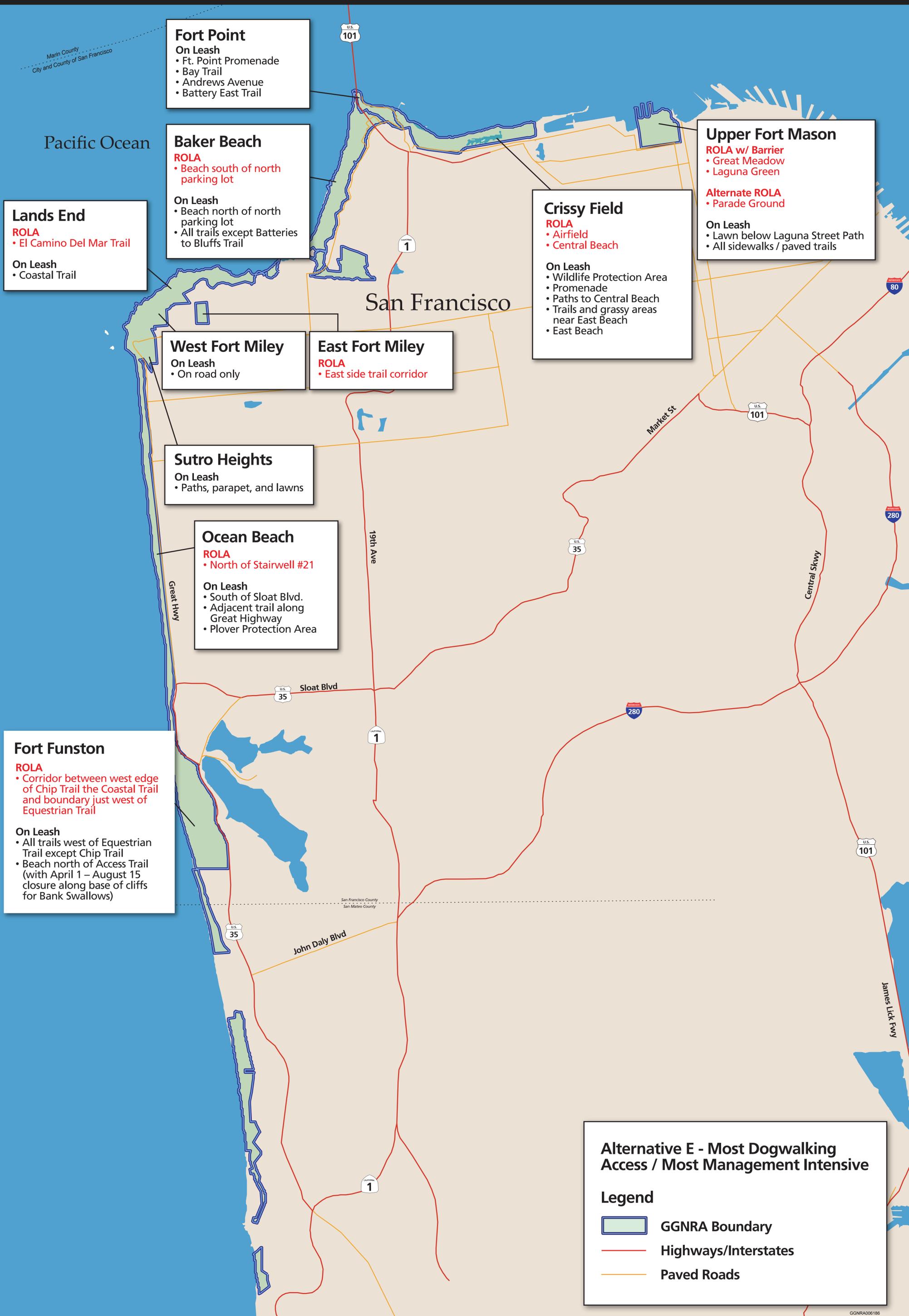
- Added ***site-specific treatment*** for new park site, Rancho Corral de Tierra.
- Alt. (E) modified to include ***all acceptable elements of 1979 Pet Policy***, assuming compliance, education and enforcement components.
- Supplemented visitor experience, health and safety impact topics with ***new law enforcement and visitor use data***.
- Supplemented resource impact topics with ***additional peer-reviewed studies***.
- Added results of OMB-approved ***survey on potential re-distributional effects***.
- ***Responded to ADA concerns*** across all alternatives.
- ***Compliance-based Management modified - removed triggers*** that would automatically switch areas to more restrictive status upon reaching defined threshold of compliance.
- ***Expanded monitoring*** to include natural and cultural resources, providing basis for future management actions.



**Alternative D - Most Restrictive Based on Resource Protection / Visitor Safety**

**Legend**

- GGNRA Boundary
- Highways/Interstates
- Paved Roads



**Fort Point**  
On Leash  
• Ft. Point Promenade  
• Bay Trail  
• Andrews Avenue  
• Battery East Trail

**Baker Beach**  
**ROLA**  
• Beach south of north parking lot  
  
On Leash  
• Beach north of north parking lot  
• All trails except Batteries to Bluffs Trail

**Lands End**  
**ROLA**  
• El Camino Del Mar Trail  
  
On Leash  
• Coastal Trail

**West Fort Miley**  
On Leash  
• On road only

**East Fort Miley**  
**ROLA**  
• East side trail corridor

**Sutro Heights**  
On Leash  
• Paths, parapet, and lawns

**Ocean Beach**  
**ROLA**  
• North of Stairwell #21  
  
On Leash  
• South of Sloat Blvd.  
• Adjacent trail along Great Highway  
• Plover Protection Area

**Fort Funston**  
**ROLA**  
• Corridor between west edge of Chip Trail the Coastal Trail and boundary just west of Equestrian Trail  
  
On Leash  
• All trails west of Equestrian Trail except Chip Trail  
• Beach north of Access Trail (with April 1 – August 15 closure along base of cliffs for Bank Swallows)

**Crissy Field**  
**ROLA**  
• Airfield  
• Central Beach  
  
On Leash  
• Wildlife Protection Area  
• Promenade  
• Paths to Central Beach  
• Trails and grassy areas near East Beach  
• East Beach

**Upper Fort Mason**  
**ROLA w/ Barrier**  
• Great Meadow  
• Laguna Green  
  
**Alternate ROLA**  
• Parade Ground  
  
On Leash  
• Lawn below Laguna Street Path  
• All sidewalks / paved trails

**Alternative E - Most Dogwalking Access / Most Management Intensive**

**Legend**

- GGNRA Boundary
- Highways/Interstates
- Paved Roads

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San Mateo Group  
Meeting summary re: Signage & Trail Use Designations at Rancho

May 17, 2010

1. Nancy began with: identifying trails, trailheads and appropriate signage. Sarah emphasized the importance of regulatory signs in place, saying it is better to establish rules than revise them after the fact.
2. A discussion ensued about when and how to designate trails. We need to have trails designated on January 1<sup>st</sup>. Should we designate bikes to be on fire roads? **Nancy said Planning division would take the lead and work with Natural Resources to develop trails and use map.** Sue offered a group of Public Information Contacts (PICs) to be out on site and George offers to work with them. Discussion continued as to how many users will use site in the early stages.

August 17, 2010

3. **Signs:** Keith Stegall presented a Google Maps based map and data layer, showing the GPSed location and content of every sign in the park. The online site allows easy access by both NPS and Conservancy staff, and can be viewed as a detailed spreadsheet including date of installation, type of sign, signpost, FMSS location #, current condition of signs and posts. This spreadsheet allows park managers to create funding requests by facility or location. The spreadsheet should be a good tool for LE staff to check location and status of signs. Reports from field staff to Keith can be used to update information such as damage.  
**ACTION ITEM:** Steve G., Keith, Susie B, Brian Aviles, GIS support, LE were identified as the group to focus on the strategy and tasks related to signs for Rancho including scope and budget, location and content including regulatory info and a timeline for regulatory process (bike rulemaking and compendium changes) and a map of assets.

September 23, 2010

4. Discussion about difference between interior signage that is separate from boundary and entry signage. Not much will be signed for interior other than replacing current POST signs and maybe some wayfinding. Further discussion about bikes on trails, and whether to sign or not. Daphne suggested something interim. Brian suggested waiting until there is more familiarity with trails to determine which ones would be good for bikes. Nancy suggested to decide one way or another for each trail. Steve suggested signs that note a "transition phase" continuing past use as-is since there are no identified current issues around bikes. Aaron suggested that trails remain closed to bikes "by policy" but not signed or enforced until details are worked out. Question arose about opening trails to bikes where there are rickety bridges. Steve pointed out the importance of having the four access points to the area reference each other.

**ACTION ITEM:** Keith, Susie and Steve will present to project review after site visit of the trail loops and determine if a bike sign needs to be placed on trails already being signed. This info can be on the kiosk. Where trails are closed to bikes, can remain silent and only deal with issues as they arise.

October 28, 2010

5. **Because RCDT came into park during Dog Management Plan, the initial dog regulations will follow CFR 2.15: allowing leashed dogs. Leashed dog icon will be on the initial signs. When dog plan is complete (2012 or 2013), park will reexamine RCDT dog policy.**

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November 18, 2010

6. Bikes on Rancho: Team decided that we will allow bikes and will initiate bike designation for Ocean View Farms and Coral Reef, but not take action for the rest of RCDT yet. Steve G., George & Keith will determine which routes will be designated in the interim and then Trails will work toward a broader plan
7. **Marybeth and Kim need to get new dog and bike regulations for RCDT into federal register and confirm all Fed Register requirements.**
8. Kim and Keith should coordinate signs to be consistent with compendium and each other.
9. George will facilitate a pad map including trailheads, trails, equestrian operations language, designated trails and regulations for our website. Map is to be labeled "interim"

December 16, 2010

10. LE needs to get new dog and bike regulations for RCDT into federal register and confirm all Fed Register requirements

January 27, 2011

11. **Regarding determining sensitive natural areas and appropriate dog regulations, Daphne recommends we proceed with 2.15 (leashed dogs) until completion of a full NR review before proceeding with dog planning process at Rancho.**

February 24, 2011

12. Hilary and Craig are working with the county on an easement map for San Pedro Mountain Road. Shirwin and Marybeth will work with the county on regs on San Pedro Mountain Road.

March 24, 2011

13. Susie has temporary sign templates and is waiting for language revisions.

May 26, 2011

14. Interim Trails Plan: **we discussed the need for an interim trail designation plan that would consider condition and suitability of existing trails and make recommendations for in interim trails designation plan.**

ACTION: Brian Aviles, Steve Griswold, Susie Bennett, Pat Kocer, a rep from LE will meet, review resource information, look at trails in the field as needed and make recommendations to:

- a. identify the primary routes that would be designated as the temporary trail system
  - b. identify any trails that would need to be closed to dogs on leash in the short term**
  - c. identify any trails that would need to be closed to bikes/horses**
  - d. identify any trails that should be closed, or not signed or mapped as designated trails
- A published rule/regulation within 90-120 days of NPS ownership is the goal.

July 28, 2011

15. **Interim Trail Recommendations (Nancy/Steve Griswold): The group presented the recommendations for interim trails and the regulations proposed, pending some additional**

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**discussions with Moss Beach Ranch and Ember Ridge re: the proposals in their area and some more field work to be coordinated by Susie Bennett.**

Susie will also coordinate resolution of additional short term trail/LE needs such as “dogs on leash” signs at most park entrances, gates, barriers etc. (with Pat Kocer, LE, )

August 25, 2011

16. Sign Plan (Keith): Julie and Rob La Porte of the sign shop visited Ocean View Farms to review set up for sign plan. Signs are for pedestrians, bikes and horses and are informational and interpretive. Trail signs will be will not focus on Coral Reef and Ocean View entrances, due to neighbor concerns, but will be placed at appropriate spots. **The signs will include dog regulations and other regulatory symbols. Regulatory language will be settled as soon as possible.** Kevin suggests installing plastic NPS boundary signs, as they're cheap and easily replaceable, while we wait for more permanent boundary signs.
17. Interim Trails Plan: The group assigned to make recommendations for interim trails and regulations gave an update on progress and next steps ACTION: Susie Bennett will coordinate the follow-up meeting with the equestrian operators and a wrap-up meeting(s) with the trails group to complete this task.

December 1, 2011

18. Kevin indicated that the Compendium will need to be updated for Rancho, specifically to include a map of the property and **clear language about trail use for dogs, equestrians, biking and hiking.**

**Agenda**  
**Dog Management Meeting**  
**June 5, 2009**

- 1) Review of Dog Management Planning Process-Shirwin and Chris (10 minutes)
  
- 2) Review of Timeline for DEIS/FEIS/Final Rule-Shirwin (5 minutes)
  
- 3) Discussion on Management of Use in Interim Period to Address Visitor Conflicts and Resource Impacts (40 minutes)
  - Educational/outreach efforts – existing and proposed
  - Enforcement – options for supporting/maximizing uniformed presence
  
- 4) Review of Decisions and Lead (5 minutes)

### Overview of alternatives development:

- Park sites included in alternatives are drawn from the parameters developed for the negotiated rulemaking process
- When we developed those parameters, guided by criteria from the Federal panel recommendation, we eliminated from consideration any geographic areas with public safety concerns, sensitive natural resources, important cultural resources and conflicting visitor uses.
- Result –only 22 locations - just under 1,300 acres - were even considered for dogwalking -7 locations in Marin; 10 locations in San Francisco and 5 locations in San Mateo
- As the alternatives were developed, input from park staff on resources and current visitor uses and info from the discussions of the neg. rule. committee helped to identify appropriate locations for dogwalking.
- The resulting range of alternatives constrains dogwalking largely to developed sites- within manipulated landscapes where possible – and the perimeters of large areas of contiguous habitat.
- We also used a county-by-county focus – to allow us to best evaluate what should be the appropriate extent of this use within each county.
- Beaches – particularly off leash use of beaches - were an important consideration particularly in Marin and San Francisco. The county-by-county approach was particularly helpful in balancing beach access.
- San Mateo – with the largest amount of relatively undisturbed, contiguous habitat – with much on-going restoration – does not have any off leash use proposed.
- Off-leash use occurs only within areas designated as Regulated Off Leash Areas (ROLAs) – a definition that came out of intensive discussion by the neg. rule. Committee. That is to signify that off-leash use requires adherence to specific behavioral guidelines.
- **ROLA guidelines** were initially discussed in the negotiated rulemaking process; we have further refined them for the DEIS.
  - Critical elements:
    - Clear definition of what “voice and sight control”
    - Clear definition of “uncontrolled” behavior

### Scoping/IDT/Internal meetings contributing to development:

- 1/05 Int. Scoping meeting develops range of preliminary alts (A=no action, B=no net loss of off leash areas – based on 79 policy, C=max. protection of park resources, D=existing conditions, plus a few off leash areas, E=existing conditions w/addition of more off leash areas, F=dog management by zones for protection of wild or domestic animal life
- 12/05 IDT mtg – refined No Action Alt with additional resource/visitor use input
- Between Internal Scoping and 12/05 IDT mtg, current management for dogwalking in certain park sites changed due to federal court action. No Action Alternative revised accordingly. 12/5 mtg notes included: “*Because there may be differences between the regulatory framework and current conditions (e.g. although the leash law may be in effect in some areas, the park may not have adequate resources to fully enforce), No Action also includes actual “on-the-ground” activities that are ongoing.*” **But final Alt. A reflects only current regulatory conditions.**
- 10/06 IDT mtg, further refinement of range of alts per add. resource input

- 11/06 IDT mtg to discuss commercial dogwalking and impact thresholds
- 1/07 IDT meeting – continued refinement of alts, development of new alts – consideration of fencing
- 10/07 IDT mtg – meetings with divisions separately to gather further info for alts

Internal Meetings for Alternatives development:

06/07:

## **GGNRA Dog Management Plan Background Summary**

**1972** - GGNRA established. Pet management governed by the NPS-wide pet regulation requiring pets, where they were allowed, to be crated, caged or restrained at all times.

**1979** - Responding to public input, GGNRA Citizen's Advisory Commission recommended specific areas in Marin and San Francisco for off-leash dog walking – a policy in place in the park for 20 years. Commonly referred to as the 79 Pet Policy.

### **Since 1979**

- Growth of Bay Area population and number of dog owners wanting to use GGNRA lands for dog walking, combined with increase in overall use of GGNRA lands by many user groups has created conflicts between users.
- Increased park knowledge of special status species in the park that could be impacted by dog walking use.

### **Dog Management Timeline**

#### **1999**

GGNRA closed 12 acres of Fort Funston for habitat restoration, safety and protection of geologic resources, resulting in a lawsuit by organized dog walking groups over lack of public notice and comment prior to the closure. Events surrounding the lawsuit highlighted the 1979 Pet Policy, which was not in compliance with NPS pet regulations.

#### **2000**

- Federal District Court disallowed the Fort Funston closure until NPS provided an appropriate public notice and opportunity for comment on the closure. The park completed a notice and comment period in 2000, allowing the closure to take place.
- Following the Fort Funston court decision, GGNRA determined that a comprehensive approach to dog management in GGNRA was needed.

#### **2002**

- Advanced Notice of Proposed Rulemaking (ANPR) for dog management in GGNRA released for public comment on whether GGNRA should enforce the existing NPS pet regulation, or whether the park should identify specific locations/ways to address off-leash use within the park.
- following the release of the ANPR and clarification that the 1979 Pet Policy was not in compliance with NPS regulations, GGNRA began to emphasize education and enforcement of the NPS pet regulation; however, the regulation was routinely ignored by many park visitors.

#### **2004**

GGNRA began a dog management planning/rulemaking process with preliminary steps to establish a Negotiated Rulemaking Committee to seek consensus on a proposed rule among stakeholders, and initiating work on an environmental impact statement (EIS).

## **2005**

- Federal Court decision affirmed a dismissal of citations for violations of the NPS leash regulation on GGNRA lands. The decision noted that the 1979 dog walking policy had been in effect in the park for many years, and that prior to enforcing the NPS-wide leash regulation the park was required by 36 CFR §1.5(b) to conduct a formal public notice and comment rulemaking process.
- Status of GGNRA dog walking management adjusted to include the 1979 Pet Policy, the NPS leash regulation 36 CFR 2.15 and the GGNRA compendium.

## **2006/2007**

- GGNRA put in place emergency seasonal leash restrictions per 36 CFR 1.5 to protect the Western Snowy Plover in two areas of GGNRA that had been opened to off-leash dog walking by the federal court decision.
- GGNRA Negotiated Rulemaking Committee met over a period of almost two years, ending in October 2007, but was not able to reach consensus on a proposed special regulation for dog management. The Committee did reach consensus on three elements: guiding principles for developing dog management options; guidelines for commercial dog walking; and site-specific treatment for Oakwood Valley in Marin County. These consensus agreements have been incorporated into two of the six alternatives in the Dog Management Plan/DEIS.

## **2008**

Special regulation promulgated for seasonal leash restrictions on sections of Ocean Beach and Crissy Field to protect the Western Snowy Plover.

## **2011**

Dog Management Draft EIS released for public comment

## **2012**

Supplemental EIS developed to incorporate information from public comment, additional studies and data, and to address Rancho Corral de Tierra. To be released for public comment in early 2013

## **2014**

Early 2014 current estimated release of the Notice of Proposed Rulemaking

## **2015**

Early 2015 current estimate Final EIS and Final Rule

**Park website for further information: [www.nps.gov/goga/parkmgmt/dog-management.htm](http://www.nps.gov/goga/parkmgmt/dog-management.htm)**

# **Public Response to the National Park Service's Proposed Habitat Protection Closure at Fort Funston**

**November 28, 2000**

## **Overview**

### **Goals and Project Description:**

As part of the resource protection mandate of the National Park Service (NPS), approximately 12-acres of Fort Funston is being closed year-round to off-trail recreational use by the public. This action will protect habitat for a nesting colony of California state-threatened bank swallows (*Riparia riparia*), a migratory bird species once more common along the California coast that has declined significantly due to habitat conversion and increased recreational use. This closure is also necessary to enhance significant native plant communities, improve public safety, and reduce human-induced impacts to the coastal bluffs and dunes, a significant geological feature.

The entire 12-acre project area will be closed year-round to visitor access. There is a portion of one designated trail located within the footprint of this closure. This trail, known as the "Spur trail", will be closed to visitor use because southern sections of this trail have become unusable due to increased sand deposition on the trail surface. This has compounded the establishment and use of unauthorized "social" trails in the northern section of the project area. Visitor use of and access to all "social" trails including "the Gap" within the project footprint will be prohibited by this closure.

**Schedule and Process for Public Comment:** The announcement of the proposed closure and solicitation of comments was published in the Federal Register on July 18, 2000 and on the GGNRA's web page. A copy of the federal register notice was also mailed to an established list of nearly 1,000 individuals, organizations and media members who expressed interest in Golden Gate National Recreation Area's planning, management and operational activities. The original closing date for comments was September 18, 2000. The closing date was extended to October 6, 2000.

By October 6, 2000, approximately 1,500 submissions were received, including letters, postcards, videos, signed petitions, court documents and facsimile messages. Comments were also accepted at two public meetings. The first was at the Advisory Commission meeting on August 29, 2000, at park headquarters, at which 37 people spoke on this issue. Because of the late hour of this agenda item (beginning at 10:30 P.M. and continuing until 12:30 A.M.), 14 people who had signed-up to speak had left the meeting. Those people were invited to speak at the next Advisory Commission meeting that was held at Fort Mason on September 26, 2000.

## **Comment Summary**

The remainder of this document summarizes the comments received regarding the NPS' proposed closure of a 12-acre area at Fort Funston. Of the approximately 1,500

submissions received, about 1,100 were opposed to the proposed closure. About 400 submissions supported the proposed closure.

Comments opposing the proposed closure are divided into the following categories:

- Discussions regarding NPS's Closure Justifications
- Established Uses of Fort Funston (i.e., dog walking)
- Suggestions
- Other Comments

Comments supporting the proposed closure are divided into the following categories:

- NPS has a Responsibility to Protect Habitat
- Public Safety
- Resource Protection and Recreation Use Conflicts

The methodology used to summarize these comments was a three-step process.

- The first step was to record chronologically all original comments (comments were paraphrased or quoted);
- The second-step was to categorize the comments and eliminate those comments that duplicated the same sentiment in another comment, and;
- The third-step was to summarize the general theme of each category of comments. Those comments that best expressed points or ideas of each category were selected as examples, as well as those frequently stated or those expressing a unique concern.

## In Opposition to Fort Funston Closures

### Discussions Regarding NPS's Closure Justifications

The closure notice stated four justifications for the proposed action. Comments addressing these four justifications follow. The general theme of the comments described in this section was that "bad science" was used in making the decision and that there was insufficient justification to support the closures.

#### **General Discussion:**

- *Limiting recreation areas in a crowded city is not good management.*
- *...support(s) setting aside tracts of land large enough to support a wide variety of species, with populations large enough for genetic health. However, setting aside wee scraps of land inside an urban area, like Fort Funston, represents excessive zeal, a kind of environmental Puritanism.*
- *An ecosystem cannot be ignored or off-handedly replaced simply because it incorporates humans and pets. The removal of these "non-natural" components will increase the use of the area by other "non-natural" components endemic to an urban environment -- like rats, cats, other feral animals and urban birds.*
- *Public notice inadequate and no provision for public review of the documents relied on for the proposal. Over 20% of the Funston has been closed to public without due process.*
- *Wants to know if there is an EIR on this policy decision. NPS should have conducted environmental impact studies before taking action.*
- *I am demanding a thorough public investigation into your agencies behavior and activities that are directed against the park using public (funds?).*
- *If areas must be closed due to environmental concerns than adequate studies must be performed and an open forum must be held to allow for demonstration of these studies, discussion and feedback.*
- *Pressure from Audubon and Native Plant Society caused the NPS to propose closure, rather than the facts.*
- *GGNRA is being influenced by the environmentalists to the exclusion of other constituencies.*

#### **Bank Swallows:**

- *California Department of Fish and Game advised that only the cliff face fence is all that is necessary to protect swallows.*
- *Install fences on the cliff face to protect swallows.*
- *Studies have shown that closing areas does not help populations of bank swallows and in fact their population has gone down since the closures.*
- *Believes that swallows are not shy and can live harmoniously with humans and dogs.*
- *NPS's argument that human shadows cast on the cliff borroughs is not supported by science. To say that swallows need the plant growth areas as their "habitat" for nesting, etc, is false – pure pretense.*
- *...we should be saying that it's amazing that we have these two strange bank swallow colonies... We should be looking at that more (as) and anomaly instead of an alarm.*

- *The NPS has failed to analyze...the impact of unleashed dogs on controlling predators of bank swallows... there were fewer predators at Fort Funston than existed at other colonies...(Fort Funston) predators may (have been) less in evidence than at some more typical locations.*
- *People need open space as well as birds.*

***Geology and Erosion:***

- *Dogs are not de-stabilizing the cliffs.*
- *Removing ice plant and trees will hasten process. Native planting has increased erosion.*
- *The amount of material lost through cliff retreat and land sliding dwarfs any impact from people walking along the cliff.*

***Dune Restoration and Native Plants:***

- *Does not believe that the closure is about swallow protection, but “native plants.” It appears that the native plants are not recreation friendly the way that the ice plants are.*
- *Native vegetation is only for swallows, and therefore not needed.*
- *Dunes were never filled with native plants...they were 90% dunes with a bit of brush.*
- *...the removal of the iceplant will erode the history of the California coast. I see the iceplant as a part of our heritage, a remnant of the war years. Growing up, I learned that without the iceplant the military would have had major erosion problems and had difficulty maintaining camouflage for the bunkers and batteries, installed to protect our coastline.*
- *People cause more damage than dogs do...*
- *NPS's true plan is to blanket the entire area with thick, 2-4 foot-high plant growth, until all open areas of the Fort are unusable to people and pets and to severely regulate all access to the park by people and pets to strictly designated trails lined with restraining fences on both sides and posted with signs threatening fines for those who trespass.*

***Public Safety:***

- *Believes that the closed areas should be open and that other areas closed.*
- *If safety is a concern, why not just install a barrier instead of closing the entire area.*
- *The responsibility for safety should be determined by the individual not the NPS.*

**Established Uses of Fort Funston**

Comments noted the importance of Fort Funston as one of the few remaining places within San Francisco and the Bay Area where dogs can play off-leash and frolic with other dogs. The mental and physical benefits to both dogs and people of providing a place for dogs and their owners were noted. Fort Funston’s importance as being one of a few places within San Francisco where a single woman can enjoy the outdoors and feel safe was also noted. Many people commented on the recent history of the area and that dog walking has been an ongoing recreation pursuit since parts of Fort Funston became a public area in the 1960s and a unit of the National Park in 1972. Other comments described the purpose of the park, namely recreation not preservation of a natural area. Many letters also provided information on how monthly-organized clean-up days are held

by an association of dog owners who use the park for their recreation. Other letters suggested that the park be taken back by the City of San Francisco. Examples of comments included:

- *Off-leash areas are essential for the health and social well being of dogs, and of people.*
- *Walking a dog off-leash is mandatory to maintain its physical and mental health.*
- *I feel safe when I walk my dogs.*
- *Years ago, Fort Funston was unsafe, frequented by “homeless people, drunken people, (and) people on drugs... This has all changed. Today--Fort Funston is a clean, safe place to walk-- esp. for a single woman.” It is safe and clean due in large part to the dog owners.*
- *Seeing dogs run free is a great way to relieve stress.*
- *Enjoy seeing hundreds of dogs playing.*
- *There are fewer and fewer places to go and enjoy nature with dogs.*
- *Well-exercised, well-socialized dogs are good dogs.*
- *Dogs make people happy - not Birds!!!*
- *Fort Funston is considered the Disneyland of the canine world. Can you imagine what it would feel like if Disneyland no longer allowed children to visit?*
- *I don't know where to else to take my dog to socialize. Without the socializing my Rottwieller would probably be mean and wouldn't get along with other humans either. Dogs not allowed to run off leash develop social problems.*
- *Fort Funston is important to non-dog owners who wish to have a sense of the wild and a sense of protection.*
- *Protesting closing of sand dunes, previously used for sliding.*
- *A 1999 NPS study shows 74% thought off-leash dogs is what makes Fort Funston "special." Less than 2% had concerns about dogs.*
- *Don't turn Fort Funston into a botanical, nature, or wilderness preserve – it is not Yosemite or a pristine place.*
- *(GGNRA) was not created just for a small, well funded vocal clique that seeks to reproduce esoteric California plant life in what has always been sand dunes or to protect the Bank Swallow that fled this area some time ago because of land clearing and replanting activities undertaken by your agency.*
- *Don't want to be confined to narrow trail only to observe "native vegetation".*
- *The NPS should not have removed the Sunset Trail. An asphalt trail should be replaced so that those who frequent the area with strollers, wheelchairs, or who need a firm surface to walk on can once again enjoy the area.*
- *Areas where dogs can run free are being eliminated. In SF space is at a premium and open space for recreation is valuable.*
- *My primary concern is that the Park service ultimately intends to close the park to pets.*
- *Fort Funston is not Mount Rushmore. It is a city park...*
- *SPCA calls it the Peoples Park.*
- *We have had to go to the East Bay where they seem able to adequately protect the environment and give pleasure to dogs and owners. Regional Parks have "enlightened" off-leash policy.*
- *Nature intends that we live in a multi-species world; let us keep Fort Funston open to all species.*
- *Inner city kids need a good place to camp, such as Fort Funston. Don't close off the park to these kids.*
- *Put the fun back into Funston.*

## Suggestions

The park received a number of letters with suggestions regarding other approaches to managing the area besides restricting dog-walkers.

- *Supports finding a compromise to allow protection and people walking their dogs in a responsible manner . . . native planting and swallow nests restoration can be done. successfully without taking more than 75% of the beach cliff trails away from the dogs and people that enjoy this park. "Please don't take our cliffs away!"*
- *If Fort Funston is closed to off leash then another area that is open to off leash dog walking should be identified.*
- *Supports seasonal closing of area (and limiting of days dogs are off leash).*
- *Design a comprehensive plan with native plants in low or no traffic areas, with swallow protection, if they need it, and with the rest of us left alone to enjoy what remains of the evolution of the Army's work.*
- *(vegetation) restoration should be limited to the fringes of the property.*
- *...the problems facing the Fort are due to the person(s) taking out herds of dogs... I have been charged by masses of uncontrollable animals, and I, as a dog person, find this difficult to handle, even with the non-aggressive dogs that I own. The dog walkers with the uncontrollable numbers of dogs seem to be oblivious of this problem. The numbers of dogs per handler needs to be limited to 2-3! These "professionals" need to take out only a few dogs at a time to exercise, not 10-15 at a time as they are now doing.*
- *We will enthusiastically support a balanced policy and urge you not to impose onerous restrictions that would make Funston "off-limits" to us.*
- *Has no problem with being restricted to trails, but objects to the closure of 12 acres.*

## Other Comments in Opposition to the Proposed Closure

Some comments did not fit into the major categories above. A sample of those comments follows:

- *The handling of the public comments at the GGNRA's Citizen's Advisory Commission September meeting was criticized. The closure was not the first thing on the agenda and the testimony was not heard until 10:45 P.M.*
- *Fence posts are treated with cancer causing chemicals.*
- *Hang-glider users do not disturb swallows.*

## In Support of Fort Funston Closures

### NPS has a Responsibility to Protect Habitat

Comments noted that the NPS has a mandate to protect natural and historic resources.

- *Preservation of the colony of threatened bank swallows must be a top priority in the management of Fort Funston.*
- *The park service should close the maximum area necessary to protect them.*
- *Existing laws that require all dogs to be on leash in national parks should be firmly enforced.*
- *Because of the unique nature of the (bank swallow) colony the park will designate it as a research natural area. This designation protects the area from any development and will receive special management attention (1982, GGNRA resource management plan)*
- *As one of the last remnants of land that approximates San Francisco's natural pre-settlement landscape, the Fort Funston dunes have tremendous importance both historically and ecologically.*
- *...(iceplant is) a species that is "actively smothering native California wildflowers while converting pristine coastal dune, cliff and prairie habitats into desolate biological wastelands that our native flora and fauna cannot survive in..."*
- *(NPS's proposal) will undoubtedly provide a vast improvement to the habitat.*
- *The (dune) scrub is an incredibly rich environment, supporting a wealth of plant species, many endangered, butterflies, deer rabbits, field mice, and the hawks that hunt them...*
- *The proposed habitat protection closure is consistent with the recent order issued by the Director of the NPS, indicating that protection of natural resources is the priority in national parks and recreation areas...This order indicates "that when there is conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant."*
- *I have been a volunteer at the Fort Funston nursery for the last 12 years. During that time I have seen the gradual degradation of the non-fenced dune landscape caused by the increased number of dogs. This makes me feel that my work is useless...*
- *Children sliding down Joey's Hill is destructive to (the) sand dune.*
- *This (NPS closure proposal) is an entirely reasonable proposal: indeed, the proposed closure would still leave over 80% of Fort Funston available for recreational activities.*
- *The closure notice also documents the alarming increases in cliff rescues of dog and human visitors in the Fort Funston area...*
- *The cliff climbing and cliff rescues clearly are a direct threat to the swallow colony and every measure must be taken to eliminate this situation.*
- *...It is unclear how the Park Service intends to protect the swallows from harassment and activities on the beach beneath the colony...*
- *It is also questionable whether the continued allowance of off-leash dog running and social trail construction will not lead to a general disrespect for the resources of Fort Funston.*
- *It (Fort Funston) must be managed for its biological and historical features, not as a "dog run"...*
- *As a public entity you are charged with serving the broader public, not just those who have the means to launch a malicious campaign of self-interest.*

## **Public Safety**

Many letters expressed concern that they were not able to fully enjoy the park because of the presence of loose dogs.

- *People are not being protected from the dogs that are not on leash.*
- *Is there anything that the park service can do to make these dog owners control these dogs so the rest of us can again enjoy the park?*
- *Dogs have stolen the park from us.*

- *I no longer take my students to Funston since a large out of control dog knocked one of the children over and thoroughly frightened the rest during a field trip two years ago. The owner did not yell until I pushed the dog away, and as you might guess, she yelled at me.*
- *My Husband and I tried to take our young son there (Fort Funston) a few weeks ago to walk and watch the hang gliders. We had to leave because we could not walk two feet without dogs jumping up on us. ... it was not safe for our 3-year old. I asked owners, when they were close enough to see to please hold the dogs back. But they could not. Often the owners were nowhere near their dogs.*
- *7 or 8 years ago I use to walk at Fort Funston with friends and the children- the only dogs I remember were on (leashes), controlled by their owners.*

### **Resource Protection and Recreation Use Conflicts**

Numerous comments indicated concern about recreation use in relation to resource protection.

- *I have lost nearly all fondness for dogs after watching them...degrade habitat, destroy sand dunes, chase birds and pee on children.*
- *The park is dirty with dog hair and poop everywhere.*
- *It is a shame for the dogs and the owners, but it is NOT the responsibility of a national park to accommodate them.*
- *...(data) showed that 86% of the use at Fort Funston were dog walkers. And, to me, that begs the question: If Fort Funston is such a unique and beautiful place, why is its use being dominated by a predominantly single, special-interest group?*
- *...we applaud the GGNRA for attempting to protect what little wildlife that remains at Fort Funston.*
- *Unfortunately, GGNRA has curried the favor of the small off-leash dog-user group, to the detriment of the park' resources and a vastly superior number of other park users, whose activities do not come in conflict with park regulations.*
- *Need a comprehensive management plan for Fort Funston.*
- *...forbid professional dog walkers from using Fort Funston.*

## **Record of telephone conversation**

April 7, 2004

Bill Merkle  
Wildlife Ecologist, GOGA

- The lit search on Impacts of human disturbance and dogs on shorebirds and Impacts of off-leash dogs on wildlife, vegetation, and water quality noted in PWR NR Management News were requested by Bill; work was done by his SCA intern.
- Bill may have other information in a bibliography of his own, compiled as part of his dissertation.
- Discussed scope of data gap analysis for reg-neg
- Overall, our first question should be “What is Affected Environment?”
- Which leads us to:
  1. what areas are on the table?
  2. justification of all areas that are off the table
  3. id of all T & E species habitat areas (and corridors?)
  4. id migratory bird areas
- Need to clarify how much we absolutely know about the affected environment and also how much about the affected environment can we infer?
- Will we need to get use stats on areas to be considered – can we get those stats from staff?
- Will we need to monitor dog walking activity in areas – since use levels will lead to potential for impact
- Note that data on dog walking activity and affected area will provide info for the no-action alternative.
- Will we have to get into levels of impact and cause and effect to show what is significant?

Record of telephone conversation  
April 19, 2004

David Gutierrez

San Francisco Mayor's Office of Neighborhood Services

He is the mayor's office contact with SF RecPark and Districts 2 and 7

[d.gutierrez@sfgov.org](mailto:d.gutierrez@sfgov.org)

554-6148

- For the last three weeks, he has been getting a couple of emails every day regarding leash law enforcement at Fort Funston
- Wanted information from us so that he could respond to them
- Some assumed Funston was city property
- Sent him a copy of an email response I had sent out recently to woman wanting to know about the leash law enforcement at Funston
- Also, spent about 20 mins or more explaining about the reg-neg process, and what led up to it.
- Email to him also mentioned why people may have recently had perception that we are enforcing more heavily:

*There has been no change in enforcement of the regulation in the park, but the combination of not currently having to staff for Level Orange, which takes rangers away from regular patrol areas; a number of recent cliff rescues for dogs and people at Fort Funston; and the presence of NPS field trainees in the park has likely led to a perception that there is an increase in enforcement efforts at Fort Funston. Regarding the trainees, Golden Gate NRA, is one of a number of NPS parks that serves as a field training park for law enforcement rangers recently graduated from the training academy. Law academy graduates spend 3 months at a field training park before returning to their home park; this brings 3 to 4 law enforcement rangers to the park during a training rotation.*

## **Record of telephone conversation**

Sept 28, 2004

Mike Hardy

- Brent Plater (Ctr. For Biological Diversity) is contacting national organizations, particularly national dog advocacy orgs that agree with the Ctrs posture that NPS should not allow off-leash use.
- He feels that the committee is being stacked with local dog orgs in favor of that use
- He wants a national voice as to whether there should be off leash
- He – the Ctr – may decide not to participate
- Is putting together lists of statutes that we would be violating by allowing that use – ESA, Migratory Bird, Marine Mammal etc
- Mike will contact the national orgs that Brent has given him to see what they have to say: American Kennel Club policy office in Raleigh, N. Carolina (Courtney Campbell) and the national office of the Humane Society (Eric Sakach)
- Mike may also try to have Brent talk with Joanne Wald, to understand that the large enviro orgs are saying this is a local issue
- Mike and Greg still plan to complete a list of proposed committee members this week
- Mike will let us know if there is going to be a push back from Brent re: signing on to be part of this committee
- Brent also wanted to see charter and by-laws; Mike told me no one else has seen either of those things and they are signing on. Let Brent know that the names need to go back as a package and that he needs to decide whether the Ctr. will participate or not.

## **From presentation at October 27, 2007 Reg Neg meeting:**

Michael Edward (NPS Environmental Quality Division) presented a timeline for the NEPA process:

November 2007 – January 2008: NEPA Team develops reasonable range of alternatives for draft EIS.

February 2008 – Summer 2008: Preparation of internal draft EIS.

Summer 2008: NPS identifies preferred and environmentally preferred alternatives (may be different) through a process called “Choosing By Advantages.”

**Fall 2008: The draft EIS and draft rule will be released for a minimum 60-day public comment period.**

Early 2009: Based on public comments received, the draft EIS and draft rule may be modified.

**Summer 2009: Final EIS and final rule prepared.**

Fall 2009: Record of Decision (ROD) for the Dog Management Plan would be signed by the NPS Pacific Northwest Region Regional Director; final rule published in Federal Register – implementation begins 30 days after publication.

**GOGA Reg Neg/NEPA To Do List**  
**June 13, 2006**

## **GGNRA TASKS**

### **Natural Resources/ Law Enforcement/ Interpretation Divisions:**

1. Collect data as requested per data needs list
2. Review Description of No Action, Thresholds, and Affected Environment for NEPA posted on GCommon drive. **Consolidated comments from each division due July 7.**
3. Participate in calls as needed

### **Administration:**

#### **RegNeg Tasks from 5/15 meeting:**

1. Set up Technical Subcommittee mtg (replaces full committee of 6/22). (CP)
  - a. Possible dates July 14,18,19,21. (DONE by CP—MEETING ON JULY 18)
  - b. Decide whether to combine this meeting with agency scoping (EQD) (DONE)
2. Send CBD response letter to Keith McAllister (CP) (DONE BY CP 5/31/06)
3. Develop list of interests and issues – **Due date?**
  - a. listed by geographical area per parameters list of areas open to discussion.
  - b. NPS list can incorporate NEPA purpose, need, objectives, issues, (generally).
4. Parameters edits (CP): (DRAFT EDITS MADE BY GOGA STAFF 6/26 AND NEW VERSION TO BE CIRCULATED)
  - a. Explain what is meant by Trails in undeveloped areas and dogs allowed on-leash in T&E species. Will provide reg-neg cmt. a list of these areas.
  - b. Remove Travel off Established Trails
  - c. Note that N. Marin lands not included; managed by PORE
  - d. Need to further elaborate on justifications for the parameters
  - e. circulate to NPS staff for review
5. Investigate how to tape summaries (CP)
6. Call Daniel Crain re: resignation of Christine Rosenblatt (CP) (DONE CP)
7. Subcommittee: contacts for Marin County, City of San Francisco, USFW, DF&G, NOAA Fisheries (CP) (DONE CP)
  - a. Talk with Betsy Cutler, Cindy Machado re: Marin Contacts (DONE CP)
  - b. Discuss agency contacts with full committee on Reg-Neg/NEPA call (CP) (DONE IN CONFERENCE CALL OF 6/21/06)
  - c. figure out marine mammals issues (DON'T KNOW WHAT THIS MEANS?)
8. Work with EQD to revise NEPA side of Estimated Timeline Schedule (SES)
9. NEPA presentation to technical subcommittee:
  - a. NEPA methodology and impact thresholds, as well as overview on how to apply them.
  - b. What data has been gathered
  - c. Questionnaire for committee on current conditions
  - d. How data is used in NEPA

- i. new DOI regs
  - ii. how we incorporate public comment
- 10. Post committee protocols on PEPC when available (SES)
- 11. Powerpoint on Joint Factfinding copied and handed out to Committee reps. and posted on PEPC (Sandy Hamilton will send when she clears with author agency)
- 12. Brief Committee members on John Strylowski's offer to assist in rulewriting (CP)  
(DONE BY CP IN CONFERENCE CALL 6/21/06)

**General Reg Neg Tasks:**

- 1. cc EQD on emails related to reg-neg agenda and materials
- 2. Summaries from previous meetings up on website and available for public at each meeting (SES website/JM copy for public)
- 3. Scan hard copy items listed as attachments to summary, and public comments between each meeting, send to SES to post on PEPC/to Catherine McCracken to attach to meeting summary(MF)
- 4. Copy public comments that are received between each meeting for public (JM)
- 5. Copies of handouts for Committee and agenda for public and NPS staff (60 handouts) (JM)
- 6. Maps: as needed (Craig Scott w/CP and/or SES)
- 7. discuss how to work with USIECR re: regneg budget/expense tracking and any possible future adjustments to their SOW (SES,CP)
- 8. JFF funding availability - follow up with Elena Gonzalez. Send her proposals for money for next year.

**NEPA Tasks:**

- 1. Review of working draft sections of EIS (posted on internal park common drive and notification sent out 6/12)) by NR, LE, Env. Com, CP, SES and Interp. Sections are: No Action, Affected Environment and Impact Thresholds. **Consolidated comments from each division due July 7.**
- 1. Set date for agency scoping (possibly coordinate with Tech subcommittee meeting) (EQD/CP/SES)
- 2. Confirm agency list sent by park send out scoping letter (EQD/SES)
- 3. Agency Scoping
  - a. Agenda will include:
    - 1. Project briefing
    - 2. Understanding reg-neg process, and invitation to participate in some form by the reg-neg cmt.
- 4. Presidio Trust is NOT going to be a cooperating agency. Look for response to Chris P.'s email to the Trust asking for a confirmation letter/email on this.
- 5. finalize repayment of GOGA bridge loan (should be close to finished) (SES)
- 6. review Phase 3 scope for TQNEPA (SES)
- 7. initiate formal consultation with FWS (Daphne?)

**Both Processes:**

- 1. Coordinate Park Review of Material for NEPA and RegNeg (CP and SES)

2. Continuously input reg-neg and NEPA data needs into matrix and update to do list (SES)
3. Voice Control/off-leash dogwalking- start collection of definitions of voice control (JM)
4. Administrative record (JM)
  - a. Add material to central project files and order files by project stages
  - b. Input into admin database:
    - i. project files
    - ii. docs on PEPC
    - iii. docs from CBD
5. Compile list of GIS tasks for Craig (SES/CP/EQD)
6. Produce questionnaire and interview Site Stewardship staff to collect anecdotal use info (SES)

## **EQD TASKS**

1. Draft project agreement/work with GOGA to finalize
2. Draft call agendas
3. Continuously input reg-neg and NEPA data needs into matrix and update to do list
4. Finish next SOW for NEPA
5. Revise NEPA side of Estimated Timeline Schedule per request by GOGA Management
  - a. use estimated time between tasks, but not dates?
  - b. note where GGNRA divisions' input/review will be needed
  - c. incorporate with the reg-neg 10-step design
6. Legal research
  - a. Do service dogs have more rights than non-service dogs? Emma working on this.
  - b. Formal vs. informal surveying
  - c. Are NPS regs being implemented on Presidio Trust lands?
  - d. Call Gateway, ROCR, Santa Monica, Cape Cod to determine what dog issues they have.
  - e. Have Solicitor's Office review our list of data needs for completeness (*what's this? Would sol. Office be able to provide that kind of input?*)
7. GMP - Talk to Nancy Horner, GMP team about desired future conditions
8. Write a CZMA determination...once we have a preferred alternative
9. Videotape a portion of the reg-neg meeting for EQD future trainings... would like something showing the back and forth of the process
10. Have Sarah review CBD docs – which ones to give to Heidi?

## **EQD CONTRACTOR TASKS**

1. Heidi will send all info collected on other dog management land use plans to Michael, who will review then pass on to Chris and Shirwin.
2. Daphne wants updated process schedule ASAP to be able to coordinate her summer EIS reviews with this process.
3. Baseline - include Pedro Point Headlands, Cattle Hill in baseline
4. Need finalized annotated bibliography from Kathy Joyner on cultural resources Need final report from Dec. 12-13 2<sup>nd</sup> internal scoping meeting

## **SOLICITOR TASKS**

1. Investigate Easement of Use: can residents of Muir beach establish right to use at Muir Beach? (Paula Lee)
2. Upcoming pieces that will require NPS/Solicitor review once they're in draft final stage:
  - a. Revised parameters
  - b. Final Draft of No Action
  - c. Draft of Affected Environment
  - d. Data Needs list

**GOGA Reg Neg/NEPA To Do List**  
**June 13, 2006**

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    - ii. how we incorporate public comment

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4. Copy public comments that are received between each meeting for public (JM)
5. Copies of handouts for Committee and agenda for public and NPS staff (60 handouts) (JM)
6. Maps: as needed (Craig Scott w/CP and/or SES)
7. discuss how to work with USIECR re: regneg budget/expense tracking and any possible future adjustments to their SOW (SES,CP)
8. JFF funding availability - follow up with Elena Gonzalez. Send her proposals for money for next year.

**NEPA Tasks:**

1. Review of working draft sections of EIS (posted on internal park common drive and notification sent out 6/12)) by NR, LE, Env. Com, CP, SES and Interp. Sections are: No Action, Affected Environment and Impact Thresholds. **Consolidated comments from each division due July 7.**
1. Set date for agency scoping (possibly coordinate with Tech subcommittee meeting) (EQD/CP/SES)
2. Confirm agency list sent by park send out scoping letter (EQD/SES)
3. Agency Scoping
  - a. Agenda will include:
    1. Project briefing
    2. Understanding reg-neg process, and invitation to participate in some form by the reg-neg cmt.
4. Presidio Trust is NOT going to be a cooperating agency. Look for response to Chris P.'s email to the Trust asking for a confirmation letter/email on this.
5. finalize repayment of GOGA bridge loan (should be close to finished) (SES)
6. review Phase 3 scope for TQNEPA (SES)
7. initiate formal consultation with FWS (Daphne?)

**Both Processes:**

1. Coordinate Park Review of Material for NEPA and RegNeg (CP and SES)
2. Continuously input reg-neg and NEPA data needs into matrix and update to do list (SES)
3. Voice Control/off-leash dogwalking- start collection of definitions of voice control (JM)
4. Administrative record (JM)

- a. Add material to central project files and order files by project stages
- b. Input into admin database:
  - i. project files
  - ii. docs on PEPC
  - iii. docs from CBD
5. Compile list of GIS tasks for Craig (SES/CP/EQD)
6. Produce questionnaire and interview Site Stewardship staff to collect anecdotal use info (SES)

## **EQD TASKS**

1. Draft project agreement/work with GOGA to finalize
2. Draft call agendas
3. Continuously input reg-neg and NEPA data needs into matrix and update to do list
4. Finish next SOW for NEPA
5. Revise NEPA side of Estimated Timeline Schedule per request by GOGA Management
  - a. use estimated time between tasks, but not dates?
  - b. note where GGNRA divisions' input/review will be needed
  - c. incorporate with the reg-neg 10-step design
6. Legal research
  - a. Do service dogs have more rights than non-service dogs? Emma working on this.
  - b. Formal vs. informal surveying
  - c. Are NPS regs being implemented on Presidio Trust lands?
  - d. Call Gateway, ROCR, Santa Monica, Cape Cod to determine what dog issues they have.
  - e. Have Solicitor's Office review our list of data needs for completeness (*what's this? Would sol. Office be able to provide that kind of input?*)
7. GMP - Talk to Nancy Horner, GMP team about desired future conditions
8. Write a CZMA determination...once we have a preferred alternative
9. Videotape a portion of the reg-neg meeting for EQD future trainings... would like something showing the back and forth of the process
10. Have Sarah review CBD docs – which ones to give to Heidi?

## **EQD CONTRACTOR TASKS**

1. Heidi will send all info collected on other dog management land use plans to Michael, who will review then pass on to Chris and Shirwin.
2. Daphne wants updated process schedule ASAP to be able to coordinate her summer EIS reviews with this process.
3. Baseline - include Pedro Point Headlands, Cattle Hill in baseline
4. Need finalized annotated bibliography from Kathy Joyner on cultural resources Need final report from Dec. 12-13 2<sup>nd</sup> internal scoping meeting

## **SOLICITOR TASKS**

1. Investigate Easement of Use: can residents of Muir beach establish right to use at Muir Beach? (Paula Lee)
2. Upcoming pieces that will require NPS/Solicitor review once they're in draft final stage:
  - a. Revised parameters
  - b. Final Draft of No Action
  - c. Draft of Affected Environment
  - d. Data Needs list

**GOGA Reg Neg/NEPA To Do List**  
**July 14, 2006**

## **GGNRA TASKS**

### **Natural Resources/ Law Enforcement/ Interpretation Divisions:**

1. Collect data as requested per data needs list
2. Participate in calls as needed

### **Administration:**

#### **RegNeg Tasks from 5/15 meeting:**

1. Develop list of interests and issues – **Due date?**
  - a. listed by geographical area per parameters list of areas open to discussion.
  - b. NPS list can incorporate NEPA purpose, need, objectives, issues, (generally).
2. Parameters edits (CP):
  - a. Explain what is meant by Trails in undeveloped areas and dogs allowed on-leash in T&E species. **Will provide reg-neg cmt. a list of these areas.**
  - b. Note that N. Marin lands not included; managed by PORE
  - c. Need to further elaborate on justifications for the parameters
  - d. circulate to NPS staff for review
3. Investigate how to tape summaries (CP)
4. Subcommittee:
  - a. figure out marine mammals issues (DON'T KNOW WHAT THIS MEANS?)
5. NEPA presentation to technical subcommittee:
  - a. NEPA methodology and impact thresholds, as well as overview on how to apply them.
  - b. What data has been gathered
  - c. Questionnaire for committee on current conditions
  - d. How data is used in NEPA
    - i. new DOI regs
    - ii. how we incorporate public comment
6. Post committee protocols on PEPC when available (SES)
7. Powerpoint on Joint Factfinding copied and handed out to Committee reps. and posted on PEPC (Sandy Hamilton will send when she clears with author agency)
8. Brief Committee members on John Strylowski's offer to assist in rulewriting (CP)

#### **General Reg Neg Tasks:**

1. cc EQD on emails related to reg-neg agenda and materials
2. Summaries from previous meetings up on website and available for public at each meeting (SES website/JM copy for public)
3. Scan hard copy items listed as attachments to summary, and public comments between each meeting, send to SES to post on PEPC/to Catherine McCracken to attach to meeting summary(MF)

4. Copy public comments that are received between each meeting for public (JM)
5. Copies of handouts for Committee and agenda for public and NPS staff (60 handouts) (JM)
6. Maps: as needed (Craig Scott w/CP and/or SES)
7. discuss how to work with USIECR re: regneg budget/expense tracking and any possible future adjustments to their SOW (SES,CP)
8. JFF funding availability - follow up with Elena Gonzalez. Send her proposals for money for next year.

#### **NEPA Tasks:**

1. Review draft project agreement/work with EQD to finalize
2. Agency Scoping
  - a. Agenda will include:
    1. Project briefing
    2. Understanding reg-neg process, and invitation to participate in some form by the reg-neg cmt.
3. Presidio Trust is NOT going to be a cooperating agency. Look for response to Chris P.'s email to the Trust asking for a confirmation letter/email on this.
4. initiate formal consultation with FWS (Daphne?)

#### **Both Processes:**

1. Coordinate Park Review of Material for NEPA and RegNeg (CP and SES)
2. Continuously input reg-neg and NEPA data needs into matrix and update to do list (SES)
3. Voice Control/off-leash dogwalking- start collection of definitions of voice control (JM)
4. Administrative record (JM)
  - a. Add material to central project files and order files by project stages
  - b. Input into admin database:
    - i. project files
    - ii. docs on PEPC
    - iii. docs from CBD
5. Compile list of GIS tasks for Craig (SES/CP/EQD)
6. Produce questionnaire and interview Site Stewardship staff to collect anecdotal use info (SES)

### **EQD TASKS**

1. Draft call agendas
2. Continuously input reg-neg and NEPA data needs into matrix and update to do list
3. Legal research
  - a. Do service dogs have more rights than non-service dogs? Emma working on this.
  - b. Formal vs. informal surveying
  - c. Are NPS regs being implemented on Presidio Trust lands?
  - d. Call Gateway, ROCR, Santa Monica, Cape Cod to determine what dog issues they have.
  - e. Have Solicitor's Office review our list of data needs for completeness (*what's this? Would sol. Office be able to provide that kind of input?*)

4. GMP - Talk to Nancy Horner, GMP team about desired future conditions
5. Write a CZMA determination...once we have a preferred alternative
6. Videotape a portion of the reg-neg meeting for EQD future trainings... would like something showing the back and forth of the process
7. Have Sarah review CBD docs – which ones to give to Heidi?

### **EQD CONTRACTOR TASKS**

1. Heidi will send all info collected on other dog management land use plans to Michael, who will review then pass on to Chris and Shirwin.
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1. Investigate Easement of Use: can residents of Muir beach establish right to use at Muir Beach? (Paula Lee)
2. Upcoming pieces that will require NPS/Solicitor review once they're in draft final stage:
  - a. Revised parameters
  - b. Final Draft of No Action
  - c. Draft of Affected Environment
  - d. Data Needs list

**GOGA Reg Neg/NEPA To Do List**  
**September 11, 2006**

**GGNRA TASKS**

**Natural Resources/ Law Enforcement/ Interpretation Divisions:**

1. Collect data as requested per data needs list
2. Participate in calls as needed

**Administration:**

**RegNeg Tasks from past committee meetings:**

1. Powerpoint on Joint Factfinding copied and handed out to Committee reps. and posted on PEPC (Sandy Hamilton will send when she clears with author agency)

**General Reg Neg Tasks:**

1. cc: EQD on emails related to reg-neg agenda and materials
2. Summaries from previous meetings up on website and available for public at each meeting (SES website/OC copy for public)
3. Scan hard copy items listed as attachments to summary, and public comments between each meeting, send to SES to post on PEPC/to Catherine McCracken to attach to meeting summary(MF)
4. Copy public comments that are received between each meeting for public (OC)
5. Copies of handouts for Committee and agenda for public and NPS staff (60 handouts) (OC)

**NEPA Tasks:**

1. Provide copies of all BA/BOs (still needed – those in NR files)
2. Review NEPA research docs to be presented to technical subcommittee 9/13:
  - a. Criteria for alternatives development
  - b. Definitions of visitor use/experience and conflict
  - c. Other agencies dog management tools
  - d. Species list
3. Review draft project agreement/work with EQD to finalize
4. Still need pre-1998 visitor use stats for Ft. Point – T. Griggs is contact
5. SES to interview site stewardship/habitat restoration personnel in Marin, SF and San Mateo for visitor use info.
6. SES and MB to review/evaluate source of/use of data in CBD petition
7. SES/MB to follow up on rationale behind listing of Coastal Trail between GG bridge and Baker as not under consideration for dogwalking due to resource damage that could not be mitigated
8. Presidio Trust is NOT going to be a cooperating agency – still need confirmation letter/email on this.
9. initiate formal consultation with FWS (Daphne?)

### Both Processes:

1. Coordinate Park Review of Material for NEPA and RegNeg (CP and SES)
2. Continuously input reg-neg and NEPA data needs into database (EQD contractor)
3. Update to do list after conf. calls or as needed (SES with EQD)
4. Administrative record (other CP)
  - a. Add material to central project files and order files by project stages
  - b. Input into admin database:
    - i. project files
    - ii. docs on PEPC
    - iii. docs from CBD
5. Produce questionnaire and interview Site Stewardship staff to collect anecdotal use info (SES)

### EQD TASKS

1. Draft call agendas
2. Continuously send reg-neg and NEPA data needs to contractor for needs database
3. Work with SES to update to-do list
4. Finish up consultation letter for USFWS and forward to park for review.
5. Legal research
  - a. Do service dogs have more rights than non-service dogs? Emma working on this.
  - b. Formal vs. informal surveying
  - c. Are NPS regs being implemented on Presidio Trust lands?
  - d. Call Gateway, ROCR, Santa Monica, Cape Cod to determine what dog issues they have.

From recent email from Sarah:

The list below is what Emma Cecil is working on in addition to finishing up on draft definitions of conflict, incidence, etc.

1. *NPS liability*: whether NPS would be subject to liability for dog-caused injuries (e.g., dog bites)
2. *Citizen enforcement*: whether citizen groups may "enforce" dog policies -- i.e., could NPS authorize dogwalking group to be responsible for monitoring and clean-up? **Also, authority to enter into MOU's or other agreements with dog groups for clean up, monitoring. May want to ask Steve Ortega how the park has entered into agreements with "site stewards" and other groups for various tasks as I assume this may be similar.**
3. *Dog licensing*: whether NPS can license/permit a dog, similar to how a county requires registration/licensing of dogs
4. *Service Animals*: (a) whether NPS has statutory obligation to permit dogs under disability laws (I am presently researching this issue), and (b) whether NPS **may restrict access to "service dogs" (currently the city of San Fran provides a certificate to certain types of "service dogs" different from "guide dogs for the blind." The issue is under what authority NPS could restrict service dogs on trails, buildings, closed areas, etc. Some have said that these "service dogs" are recognized under the ADA and cannot be restricted. I think a and b may be the same issue.**

6. Info on Santa Cruz off leash beach and compliance with soft boundaries
7. Agency Scoping summary– Juanita Barboa to forward the agency scoping notes to Sarah/EQD to draft them up for review/revision
8. Write a CZMA determination...once we have a preferred alternative
9. Videotape a portion of the reg-neg meeting for EQD future trainings... would like something showing the back and forth of the process
10. Have Sarah review CBD docs – which ones to give to Heidi? (*done?*)

### **EQD CONTRACTOR TASKS**

1. Compile results of NEPA “7 questions” current conditions questionnaire
2. Need finalized annotated bibliography from Kathy Joyner on cultural resources
3. Need final report from Dec. 12-13 2<sup>nd</sup> internal scoping meeting

### **SOLICITOR TASKS**

1. Investigate Easement of Use: can residents of Muir beach establish right to use at Muir Beach?
2. Upcoming pieces that will require NPS/Solicitor review once they're in draft final stage:
  - a. Final Draft of No Action
  - b. Draft of Affected Environment (?)

## Why a Special Regulation for Dog Walking?

**Correct the current status.** A special regulation is needed to change the current dog walking status through proper procedure, per the 2005 Federal Court decision.

**Appropriate management.** Currently, actions that would cause significant changes to dog walking use, or change the 1979 Pet Policy, *cannot proceed without rulemaking*.

**Protection of resources.** GOGA has 3rd highest number of T and E species in the NPS – many *at risk from unmanaged dog-walking*.

**Improve Visitor Experience.**

**Displacement.** Dog walking has *displaced other users* – e.g. equestrians, elderly visitors, bird watchers and those fearful of dogs - in some of the most popular areas of the park.

**Degraded Visitor Experience.** Frequent *complaints from families, seniors and others* about negative experiences due to interference by off-leash dogs, fear of dogs and harassment by dog walkers.

**Increase Employee Safety.** There has been an *increase in dog bites and aggression* experienced by NPS field staff.

**Reduce Management Burden.** Dog walking-related issues account for *11% of annual law enforcement incident reports (which does not include any number of unreported incidents)*.