

P.O. Box 475372 San Francisco, CA 94147-5372 Please Visit Our Website: www.crissyfielddog.org

April 10, 2015

Mr. Jon Jarvis
Director
National Park Service
1849 C Street NW
Washington, DC 20240

Dear Director Jarvis,

On behalf of the Crissy Field Dog Group, its members and board, I would like to clarify some important points regarding your discussion on KQED's Forum radio program in San Francisco on March 26, 2015.

We believe that you gave an impression of the NPS's statutory mandate that is not the full picture on the topic of how the National Park Service is required by Congress to manage the Golden Gate National Recreation Area (GGNRA).

The NPS Must Manage Each NPS Unit for the Unit's Purposes

During the program, you addressed a caller's question about dog use in the GGNRA. In doing so, you presented the "larger perspective" of how the National Park Service (NPS) manages the 407 units within its jurisdiction.

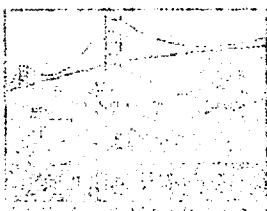
Below is a portion of the transcript with your description of how the GGNRA is managed:

[Time: 31:43]

And let me just be very clear about how Congress views these (recreation units)-how the laws are established. The title does not infer any lesser standard of management than a national park. Congress has been very clear about the system; about the national park system-are to be managed to a high standard.

APR 23 2015

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GGNRA186477



1967-68 National Park Service Budget Request - 1967-68

April 10, 1967

Mr. [Name]

National Park Service
Washington, D.C. 20540

Dear Mr. [Name]:

On behalf of the Chief, I would like to thank you for your letter of April 10, 1967, regarding the proposed budget for the National Park Service for the fiscal year 1968. The National Park Service is pleased to have your interest in the Service and its programs.

The National Park Service is a part of the Department of the Interior and is responsible for the management and preservation of the National Park System. The Service is committed to providing a high quality experience for the public and to protecting the natural and cultural resources of the United States.

The National Park Service is currently reviewing your letter and will respond to you as soon as possible.

If you have any questions or need further information, please contact the National Park Service at the address above. Thank you for your interest in the National Park Service.

Sincerely,
[Signature]


[Name]

The National Park Service is currently reviewing your letter and will respond to you as soon as possible. If you have any questions or need further information, please contact the National Park Service at the address above. Thank you for your interest in the National Park Service.

which do not frequently occur at other national park and recreation areas". Accordingly, the GGNRA is called upon to use creative solutions to meet its mandate.

I hope this information will clarify how the NPS and GGNRA must be managed; now and into the future.

Best Regards,



Martha Walters
Chair, Crissy Field Dog Group

Cc: Secretary of the Interior, Sally Jewell
Democratic Leader Nancy Pelosi
US Senator Dianne Feinstein
US Senator Barbara Boxer
Congresswoman Jackie Speier
Congressman Jared Huffman
Assistant Secretary of Interior, Ted Bolling
Acting GGNRA Superintendent Aaron Roth
Incoming GGNRA Superintendent Chris Lehnertz
San Francisco Mayor Ed Lee
San Francisco Supervisor Scott Wiener
San Francisco Supervisor Katy Tang
KQED Forum Host Michael Krasny

[Time 32:00]

When Golden Gate was established, nothing was said that we need to manage Golden Gate any differently than other national parks units or other national recreation areas (NRAs). Golden Gate is the only unit of the national park system that is at all considering any off leash dog use.

It is not just the title of a public land that matters -- it is the specific language of Congress itself that guides the NPS's actions by defining the purposes of a specific unit of the NPS, irrespective of whether a unit is labeled a park or a recreation area. The statute that governs the NPS -- the Organic Act -- makes clear that the agency must respect the enabling legislation for each NPS unit within its jurisdiction. Pub. L. No. 235, 39 Stat. 535, § 1 (Aug. 25, 1916) (the NPS "shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations").

Congress Clearly Directed the NPS to Manage the GGNRA for Urban Recreation

Congress established the GGNRA in 1972 to meet a recognized need for urban recreation and open space as the San Francisco metropolitan area grew and became increasingly developed. At the time, San Francisco was seeing extraordinary population growth and density. H.R. Rep. No. 92-1391, 1972 U.S.C.C.A.N. 4850 (Sept. 12, 1972). Density in the region had reached 16,500 people per square mile (compared to Los Angeles, which had 5,000 people per square mile) and population was expected to double between 1972 and 2000. Congress chose to act in part because the City of San Francisco offered few alternatives to the GGNRA: "the opportunities for outdoor recreation in broad open spaces are severely limited." 1972 U.S.C.C.A.N. 4850, 4851. Compliance with this statutory mandate is especially important as urban development in the San Francisco metropolitan area has continued since 1972.

From Congress' language when the GGNRA was created, it is clear that the emphasis is on preserving recreation in an area of extraordinary beauty: "In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the [GGRNA] (hereinafter referred to as the "recreation area") is hereby established." Consistent with this mission statement, Congress expressly directed the NPS to "utilize the resources in a manner which will provide for recreation and educational opportunities...." Pub. L. No. 92-589, 86 Stat.1299, § 1 (Oct. 27, 1972).

The legislative history of the GGNRA's enabling legislation makes this mandate even clearer. For instance, the House report accompanying this legislation described Congress' intent to maximize outdoor recreation: "The objective of HR 16444 is to assure that the preservation of the open spaces presently prevailing within the proposed recreation area, to provide public access along the waterfront, and to expand to the

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[Illegible text, likely a main body paragraph]

maximum extent possible the outdoor recreation opportunities available in this region.” 1972 U.S.C.C.A.N. 4850, 4858.

The report recognized the local need for recreation space within “one of the Nation’s major urban complexes” and advocated for establishing the GGNRA in order “ensure its continuity as open space for the use and enjoyment of present and future generations of city dwellers.” 1972 U.S.C.C.A.N. 4850, 4852.

The House was aware that the GGNRA is not a remote wilderness area like other NPS units. The GGNRA is clearly described as “an urban recreation area” which “must relate to the desires and interests of the people.” 1972 U.S.C.C.A.N. 4850, 4852. Nor did the House expect the NPS to take a one-size-fits-all approach for the GGNRA and other NPS units: “As a national urban recreation area, this new component of the national park system will be confronted with problems which do not frequently occur at other national park and recreation areas.” 1972 U.S.C.C.A.N. 4850, 4857.

Crissy Field Dog Group is concerned that your description of the applicable management requirements were inaccurate in suggesting to the public that Congress gave the NPS no guidance on how to manage the GGNRA any differently than another unit of the NPS. Recreation is clearly the GGNRA’s purpose, under the explicit directive of Congress.

Recreation includes off-leash dogwalking. Congress clearly recognized this in both the House and Senate reports with references to the use of the proposed GGNRA to “satisfy the interests of those who choose to fly kites, sunbathe, walk their dogs or just idly watch the action along the bay.” E.g., 1972 U.S.C.C.A.N. 4850, 4852.

The 1979 Pet Policy Continues to Govern Dogwalking in the GGNRA

Your description of the management scheme for the GGNRA also failed to mention the GGNRA’s 1979 Pet Policy. As you know, the GGNRA Advisory Committee established a Pet Policy in 1979 that identified where people could walk their dogs under voice control on GGNRA lands.

Your radio discussion also overlooked the GGNRA’s 1979 Pet Policy. In a 2005 federal court decision, Federal Court Judge Alsup was very clear that the GGNRA’s 1979 Pet Policy governs dog walking in the GGNRA and will continue to govern until the NPS goes through an adequate “public process” to determine where dog walking under voice control would be allowed in GGNRA lands.

Conclusion

Congress was very clear about how the GGNRA was to be managed in Public Law 92-589: the GGNRA was created as an urban recreation area in the San Francisco Bay Area to serve the recreational needs of urban dwellers, including off leash dog walking. And Congress was clear that that the “management” of the GGNRA would involve “problems

Martha Walters
Crissy Field Dog Group
P. O box 475372
San Francisco, California 94147

Dear Ms. Walters:

Your April 10, 2015 letter to Director Jon Jarvis concerning his radio appearance on KQED Forum on March 26, 2015 was forwarded to my office to respond on his behalf. In your letter you provide your perspective on the National Park Service (NPS) statutory mandates for management of the Golden Gate National Recreation Area (GGNRA).

The National Park Service manages its 407 units across the Country according to the NPS Organic Act of 1916, and the NPS General Authorities Act of 1970, including the 1978 amendment to the General Authorities Act (the "Redwood amendment.") Taken together, these authorities define a single standard for the management of the national park system. Additionally, GGNRA 's administration is also guided by its unique enabling legislation . The NPS Management Policies of 2006 make it explicit that all units of the NPS are to be managed and administered to a single, systemwide standard, which "begins with a mandate to conserve park resources and values." The Management Policies then go on to say that the fundamental purpose of "all parks also includes providing for the enjoyment of park resources and values by the people of the United States." The enjoyment contemplated by the statute includes both by people who visit parks and by those who may never visit but benefit from the inspiration that parks provide.

We know that continuing to have opportunities to enjoy the park in myriad ways, including with a dog, is of primary concern to Crissy Field Dog Group. Off-leash and on-leash dog walking opportunities have been part of every iteration of the park's 14 year dog management planning process. The park has listened carefully to those who advocate for more off-leash dog walking, as well as those who prefer a dog-free experience. Stakeholders on all sides feel passionately about the park, and the GGNRA is working hard to factor the variety of public perspectives into the decision-making process.

I understand that GGNRA Superintendent Chris Lehnertz and her team recently met with you and other representatives of groups interested in dog management and recreation. , and I encourage you to continue the dialogue. In late summer or early fall 2015 there will be an opportunity for the public to review and provide comments on the Draft Rule of Dog Management .

Thank you for your interest in the National Park Service, and for your continuing involvement and engagement at GGNRA.

Sincerely,

Patty Neubacher
Acting Regional Director

Cc:

Secretary of the Interior

Congresswoman Nancy Pelosi

Congresswoman Jackie Speier

Congressman Jared Huffman

Senator Dianne Feinstein

Senator Barbara Boxer

Bay Area Dog Management Zones: Extent of On-leash, Off-leash, and Prohibited Areas

Jurisdiction	City/County of San Francisco	San Mateo County	Marin County Parks	Marin County Open Space	Marin Water District	Point Reyes National Seashore	State of CA	Mid-peninsula Regional Open Space	East Bay Regional Parks	San Francisco Watershed
Area of Managed Land	3,300 acres	16,000 acres; 50 miles of trail	700 acres	15,000 acres; 190 miles of trail and fire road	21,000 acres; 130 miles of trail	71,000 acres	12,000 acres near, adjacent to GGNRA	50,000 acres; 220 miles of trail	95,000 acres; 1,150 miles of trail	63,000 acres; 210 miles of rights-of-way
Areas where dogs permitted On-Leash	3,300 acres minus athletic fields/courts; playgrounds; sensitive habitat areas	None	None* approx. 300 acres in McInnis opened to on-leash.	190 miles of trails and fire roads	21,000 acres; 130 miles of trail	150 acres of beach (approx.); most 'developed' areas; 15.4 miles of trail	Parking lots and paved roads only; no beaches or trails	17.5 acres; 50 miles of trail	Approx. 90,000 acres	None
Areas where dogs permitted Off-Leash	14 acres*; 2 miles of trail (recently reducing by 14 acres for NR protections)	None	None	70 miles of fire roads	None	None	None	17.5 acres	Most areas, excepting parking lots, picnic areas, camping, etc.	None
Areas where dogs prohibited	Athletic fields/courts; playgrounds; sensitive habitat areas	16,000 acres; 50 miles of trail	400 acres	Approx. 14,800 acres (all areas except trails and fire roads)	None	All undeveloped areas; most beaches and trails	All areas except parking lots and paved roads	Approx. 48,930 acres	Approx. 5000 acres of beaches, wetlands, nature areas/preserves and golf courses	63,000 acres; 210 miles of rights-of-way

**EMERGENCY PETITION TO THE
GOLDEN GATE NATIONAL RECREATION AREA,
NATIONAL PARK SERVICE,
U.S. DEPARTMENT OF THE INTERIOR,
TO PROMULGATE AND ENFORCE
36 C.F.R. § 2.15(a)(2) AT THE
GOLDEN GATE NATIONAL RECREATION AREA**



Desecration by Defecation: Two Bags of Dog Feces Hung Over a Plea for Protecting Imperiled Birds at the GGNRA.
Fort Funston – July 1, 2005

Submitted By

Action for Animals • Guide Dogs for the Blind • Coleman Advocates for Children and Youth • Environmental Quality for Urban Parks • Center for Biological Diversity • Golden Gate Audubon Society • Sierra Club, San Francisco Bay Chapter • California Native Plant Society, Yerba Buena Chapter • San Francisco League of Conservation Voters • Dune Ecological Restoration Team

NOTICE OF PETITION

August 16, 2005

Contact: Brent Plater
Center for Biological Diversity
1095 Market St., Suite 511
San Francisco, CA 94103
Phone: 415-436-9682 x 301
Fax: 415-436-9683

Secretary Gale Norton
Department of Interior
1849 C Street, NW
Washington, DC 20240

Director Fran P. Mainella
National Park Service
1849 C Street, NW
Washington, DC 20240

Regional Director Jon Jarvis
Pacific West Region
National Park Service
One Jackson Center
1111 Jackson Street
Oakland, CA 94607

Superintendent Brian O’Neill
Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, CA 94123

Dear Secretary Norton, Director Mainella, Regional Director Jarvis, and
Superintendent O’Neill:

Pursuant to the Right to Petition Government Clause in the First Amendment to
the United States Constitution,¹ the Administrative Procedure Act (“APA”),² and 43

¹ Congress shall make no law . . . abridging . . . the right of the people . . . to petition Government for a redress of grievances.” U.S. Const., amend. I. The right to petition for redress of grievances is among the most precious of the liberties safeguarded by the Bill of Rights. United Mine Workers of America, Dist. 12 v. Illinois State Bar Ass’n, 389 U.S. 217, 222 (1967). It shares the “preferred place” accorded in our system of government to the First Amendment freedoms, and has “a sanctity and a sanction not permitting dubious intrusions.” Thomas v. Collins, 323 U.S. 516, 530 (1945). “Any attempt to restrict those First Amendment liberties must be justified by clear public interest, threatened not doubtful or remotely, but by clear and present danger.” Id. The Supreme Court has recognized that the right to petition is logically implicit in, and fundamental to, the very idea of a republican form of government. United States v. Cruikshank, 92 U.S. (2 Otto) 542, 552 (1875).

² The APA provides that “each agency shall give an interested person the right to petition for the issuance, amendment, or repeal of a rule.” 5 U.S.C. § 553(e).

C.F.R. Part 14,³ Action for Animals, Guide Dogs for the Blind, Coleman Advocates for Children and Youth, Environmental Quality for Urban Parks, Center for Biological Diversity, Golden Gate Audubon Society, Dune Ecological Restoration Team, Yerba Buena Chapter of the California Native Plant Society, San Francisco Bay Chapter of the Sierra Club, and San Francisco League of Conservation Voters hereby petition the National Park Service to promulgate and enforce a rule implementing 36 C.F.R. § 2.15(a)(2) at the Golden Gate National Recreation Area (“GGNRA”). Rulemaking is necessary due to recent court decisions making clear that the GGNRA has, without following formal or informal rulemaking procedures, exempted itself from this validly promulgated, nation-wide regulation in significant portions of the GGNRA.

Good cause exists to promulgate and enforce 36 C.F.R. § 2.15(a)(2) at the GGNRA on an expedited or emergency basis. As demonstrated by this petition, the voice control agenda has not been adequate to protect people, our pets, wildlife, or the park from harm caused by dogs roaming off-leash, and off-leash incidents are likely to increase due to recent court orders inhibiting the Park Service’s ability to enforce park safeguards. As explained by the Humane Society of the United States and the International City/County Management Association, the voice control agenda and other non-physical pet restraint measures are inadequate to protect park visitors.⁴ The Park Service thus faces an urgent problem that cannot be adequately addressed solely by the voice control agenda currently in place, and under similar circumstances courts have found that good cause exists to promulgate rules on an emergency basis. Hawaii Helicopter Operators Assn. v. FAA, 51 F.3d 212 (9th Cir. 1995).

³ The Department of Interior’s regulations require the National Park Service to give “prompt consideration” to this petition and “notify promptly” the petitioners about the action taken. 43 C.F.R. § 14.3.

⁴ Geoffrey L. Handy, Humane Society of the United States, International City/County Management Association, Animal Control Management: A Guide for Local Governments (2001) (“Adequate restraint should be defined as physical control of animals; alternative methods such as voice control, electronic fences, and chemical sprays are not reliable for dogs whose basic predatory, sexual, or territorial defense drives have been triggered.”).

Recently the Park Service announced a proposal to proceed with a negotiated rulemaking process to address pet management regulations at the GGNRA. 70 Fed. Reg. 37,108 (June 28, 2005). While this process may result in permanent leash law enforcement throughout the park, the process will not result in final rulemaking until 2007 or 2008, leaving the GGNRA unprotected for several years. *Id.* at 37,109. Under such circumstances, it is appropriate for the National Park Service to initiate emergency rulemaking procedures to restore leash law enforcement at the GGNRA on an interim basis, see, e.g., National Customs Brokers and Forwarders Assn. v. United States, 59 F.3d 1219 (Fed. Cir. 1995) (finding good cause to exist where interim rulemaking restores agency compliance with applicable law), and if necessary and appropriate supersede these emergency rules with regulations adopted through the negotiated rulemaking process.

An appropriate response to this emergency petition would be to propose, accept 30 days of public comment, and make effective upon final publication in the Federal Register pursuant to 5 U.S.C. § 553(d)(3) the following regulation:⁵

36 C.F.R. § 7.97. Golden Gate National Recreation Area.

...

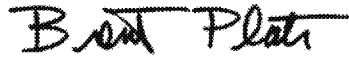
(d) *Pets*. The following are prohibited: Failing to crate, cage, restrain on a leash which shall not exceed six feet in length, or otherwise physically confine a pet at all times.

Judicial review under the APA requires reviewing courts to “compel agency action unlawfully withheld or unreasonably delayed.” 5 U.S.C. § 706(1). Accordingly, the National Park Service cannot unreasonably delay action on this emergency petition. Consistent with this mandate, the Department of Interior’s petition processing regulations, and the exigent circumstances that currently exist at the GGNRA, we expect

⁵ Alternatively the Park Service may implement this regulation pursuant to 36 C.F.R. § 1.5(b) without publication in the Federal Register under its emergency rulemaking authority.

a final response to this emergency petition within 60 days. If you have any questions about this request, do not hesitate to contact me at (415) 436-9682 x 301.

Sincerely,

A handwritten signature in black ink that reads "Brent Plater". The signature is written in a cursive, slightly slanted style.

Brent Plater

I am as strident and ardent an animal rights person as you're going to find: I don't eat animals, I don't wear animals, and I don't let my dogs off-leash. It's not a question of the dog's right, it's a question of protecting the dog. The idea that there's some kind of right to run off-leash—this is why animal rights people get a bad name, because they have idiotic ideas like this.

- Rutgers law professor Gary Francione, founder and director of Rutgers' Animal Rights Law Project (quoted in July/August 2002 edition of Legal Affairs Magazine)

SUMMARY

Leash laws provide important safeguards for people, our pets, wildlife, and our parks, and as such they are widely supported as a cornerstone of responsible dog ownership. In the National Park System, leash laws have been effective in providing reasonable accommodations for people with pets while ensuring that our Nation's outstanding biological, cultural, historical, and aesthetic resources are not impaired or degraded. In the San Francisco Bay Area—home to the Golden Gate National Recreation Area, one of our nation's boldest conservation experiments—there is broad support for leash laws in our parks, with over 71% of the general public supporting the leash laws that protect the GGNRA.⁶

Unfortunately the administrators of the GGNRA have not been faithful to the National Park System's leash laws or the public's will to see these laws enforced. For over two decades, GGNRA administrators have pursued a policy of non-enforcement of leash laws at the park, ignoring validly promulgated pet management regulations and instead adhering to a voice control agenda in significant portions of the GGNRA. Perhaps most disturbingly, this policy was implemented without using informal or formal rulemaking procedures, depriving the general public of any opportunity to express its overwhelming support for leash law protections at our parks.

The adverse results of this illicit policy could hardly be more evident. The GGNRA's own records demonstrate that the voice control agenda has failed to protect people, our pets, wildlife, or the park. Park visitors have been bitten, chased, charged, and knocked to the ground; dogs have been lost, injured, and killed; imperiled wildlife and plants have been harassed and destroyed; and the very purpose for which the park was established has been put into jeopardy. The situation at the GGNRA is so extraordinary that it impedes efforts to obtain reasonable dog access in other parks, because the damage done to the GGNRA is not something other parks wish to replicate.

⁶ See ex. 107.

This petition documents many of the adverse impacts caused by the voice control agenda at the GGNRA. Yet because the GGNRA has failed to maintain adequate records of off-leash incidents at the park over the past two decades the actual number of incidents is believed to be far greater than what can be reported here. Fortunately both the documented and undocumented harm caused by the voice control agenda can be remedied through promulgation and enforcement of the National Park System's leash law on an emergency basis at the GGNRA. The National Park System's leash law is an effective method of ensuring that our pets have reasonable access to National Parks while preserving the parks unimpaired for future generations to enjoy. Unless and until the National Park Service promulgates and enforces the leash law at the GGNRA, the park's ability to protect people, pets, wildlife, and the park itself from the threats imposed by off-leash dogs will be greatly diminished.

PETITIONERS

Action for Animals is based in Oakland, California and has published a monthly calendar of events for Bay Area animal and environmental activists since 1984. During those same years, Action for Animals has spent considerable time and effort passing animal welfare legislation in the State Capitol, as well as on the local level. Much of the focus has been on the welfare of dogs and cats, in addition to animals in circuses, rodeos, and live animal food markets. Eric Mills, coordinator for Action for Animals, is on the Board of PawPAC, California's political action committee for animals. Action for Animals continues to work with a variety of animal welfare and environmental organizations on mutual concerns affecting animals, both wild and domestic.

Guide Dogs for the Blind ("Guide Dogs") is a nonprofit, charitable organization with a mission to provide guide dogs and training in their use to visually impaired people throughout the United States and Canada. Guide Dogs' dogs and services are free to those we serve, thanks to the generosity of donors and support of volunteers. Guide Dogs' headquarters and a training facility are in San Rafael, California—20 miles north of San Francisco. The organization is proud to have provided more than 10,000 dogs to people with vision loss since 1942. Guide Dogs' schools accept visually impaired students from throughout the United States and Canada for training with a guide dog. The organization offer follow-up services to each graduate of our program at their home or place of business for the lifespan of their dog. As part of this service, Guide Dogs surveys its graduates to better understand the challenges they may face in working with, protecting, and enjoying guide dogs. A significant challenge faced by our graduates is off-leash dogs. A 2003 survey conducted by a national guide dog user group indicated that 89% of graduates have had guide dogs interfered with by off-leash dogs, and 42% of graduates have had their guide dogs attacked by off-leash dogs. Because of this, Guide Dogs recommends that graduates avoid any place where off-leash dogs are known to roam.

Coleman Advocates for Children and Youth (“Coleman Advocates”) is a one-of-a-kind local community organization that works to transform San Francisco’s services and policies for children, youth, and their families in order to create a more family-friendly community. This includes ensuring that San Francisco’s parks remain a safe and vibrant place for children, youth, and families. In particular Coleman Advocates has been involved in ensuring that San Francisco’s parks remain open and accessible to families, children, and youth through leash law enforcement. Coleman Advocates has a representative on San Francisco’s Dog Advisory Committee, and is also involved in public education and outreach efforts to ensure that leash laws are complied with and enforced in San Francisco. Coleman Advocates is also involved in the proposed negotiated rulemaking process for reviewing the applicability of the leash law to lands within the GGNRA.

Environmental Quality for Urban Parks (“EQUP”) is comprised of individuals and organizations advocating for the environmental quality of urban parks and the natural areas of the City and County of San Francisco. EQUP believes that urban parks and natural areas are extensions of the living and recreational spaces for the residents of and visitors to San Francisco. EQUP promotes high and quantifiable standards for soil, water, air, flora, and fauna and assuring safe, clean, and fun human experiences in nature, both active and passive. EQUP has been particularly active in ensuring that leash laws are complied with in San Francisco to ensure that urban parks remain safe and inviting places for people to enjoy.

The Center for Biological Diversity (“the Center”) is a non-profit organization with offices in San Francisco, San Diego, and Joshua Tree, California; Silver City, New Mexico; Tucson and Phoenix, Arizona; Portland, Oregon; and Washington, D.C. The Center is dedicated to protecting rare and imperiled species and the habitats upon which they depend. The Center has been involved in the protection of imperiled species at the Golden Gate National Recreation Area (“GGNRA”) for at least 5 years, and has a particular interest in the protection of the imperiled West Coast distinct population segment of the western snowy plover. During this time, the Center has taken an active

role in ensuring that the leash law is enforced at the GGNRA, in part to protect imperiled shorebirds such as the snowy plover from harm. For example, on February 15, 2005 the Center submitted comments to protect critical habitats for the Snowy Plover within the GGNRA, in part to protect the species from constant harassment from off-leash dogs. The Center is also a potential member of the GGNRA's negotiated rulemaking process for reviewing the applicability of the leash law to lands within the park. The Center has also been involved in advocacy and public education efforts aimed at ensuring that reasonable regulations are put in place to ensure that endangered species and wild places at the GGNRA are protected from threats posed by off-leash dogs. The interests of the Center and its members in observing, studying, and otherwise enjoying the GGNRA and its wildlife have been, and will continue to be, harmed by off-leash dogs, and if the GGNRA fails to promulgate and enforce the National Park Service's nationwide leash law the Center's interest will continue to be impaired.

Golden Gate Audubon Society ("GGAS") is dedicated to protecting Bay Area birds, other wildlife, and their natural habitats. GGAS works to conserve and restore wildlife habitat, connect people of all ages and backgrounds with the natural world, and educate and engage Bay Area residents in the protection of our shared, local environment. Founded in 1917, GGAS is one of the oldest conservation organizations on the West Coast and has played a key role in protecting wildlife and their natural habitats throughout the Bay Area. The GGAS is a potential member of the GGNRA's negotiated rulemaking process for reviewing the applicability of the leash law to lands within the park. The GGAS has also been involved in advocacy and public education efforts aimed at ensuring that reasonable regulations are put in place to ensure that endangered birds and wild places at the GGNRA are protected from threats posed by off-leash dogs.

The Sierra Club San Francisco Bay Chapter is a volunteer-based organization with 40,000 Sierra Club members in the counties of Alameda, Contra Costa, Marin, and San Francisco. The San Francisco Bay Chapter and its groups sponsor numerous conservation issue committees and recreational activity sections, based on type of outing

or social group. As part of these efforts, the San Francisco Bay Chapter is focused on preserving the historic, aesthetic, recreational, and biological values at the GGNRA.

The California Native Plant Society is a statewide non-profit organization of amateurs and professionals. Our goals are to increase understanding of California's native flora and to preserve this rich natural heritage for future generations. The Yerba Buena Chapter encompasses San Francisco and northern San Mateo Counties and is named for the tiny fragrant mint *Satureja douglasii* found in this area. The Yerba Buena Chapter Activities are as diverse as our membership and range from conservation and habitat restoration to native plant gardening and photography.

The San Francisco League of Conservation Voters ("SFLCV") formed over twenty years ago to promote environmental protection through active participation in the San Francisco political system and to enhance the integrity of that political system for all San Franciscans. As such, SFLCV promotes conservation and protection of natural resources, environmental justice, and sustainability, as well as good government issues and political reforms.

The Dune Ecological Restoration Team ("DERT") is an existing, organized group of experienced Presidio restoration volunteers. We are comprised of many of the volunteers who were at the heart of the Crissy Field Restoration. DERT's mission is to "... restore, protect and expand the natural resources of the Presidio of San Francisco." Of late DERT has been requested by the Presidio Trust to assist them in their efforts on several restoration sites where the Army still has a role to play.

INTRODUCTION

Action for Animals, Guide Dogs for the Blind, Coleman Advocates for Children and Youth, Environmental Quality for Urban Parks, Center for Biological Diversity, Golden Gate Audubon Society, Sierra Club, San Francisco Bay Chapter, California Native Plant Society, Yerba Buena Chapter, San Francisco League of Conservation Voters, and Dune Ecological Restoration Team (hereinafter “Park Protection Organizations”) are non-profit organizations concerned with the welfare of companion animals, wildlife, people, and public parks. The National Park Service’s failure to implement and enforce validly promulgated pet management regulations at the GGNRA, particularly 36 C.F.R. § 2.15(a)(2), poses a significant threat to each of these concerns. The Park Protection Organizations submit this petition to request that the National Park Service immediately begin rulemaking to bring the GGNRA into compliance with nationwide regulations.

This petition explains how the GGNRA’s failure to enforce the leash law has resulted in dog attacks on people recreating at this National Park; explains how running dogs off-leash at the GGNRA—a park that contains none of the safeguards recommended by responsible animal welfare organizations to ensure the safety of off-leash pets—has resulted in needless and preventable injuries and deaths to many dogs in the park; explains how continued enforcement of the National Park System’s leash law at the GGNRA—which protects more federally listed species than any other unit of the National Park System in the continental United States⁷—is critically important to the continued existence of the threatened and endangered species in the park; and explains how the epidemic of off-leash dogs at the GGNRA has subverted the original values Congress sought to protect when it established the park over 30 years ago.

⁷ See http://www.nature.nps.gov/biology/endangeredspecies/Top_10_Parks.pdf. Only three National Parks contain a greater number of imperiled species: Haleakala National Park, Hawaii Volcanoes National Park, and Channel Islands National Park. Each of these parks is found on an island, which typically have more endemic species than their continental counterparts. This makes the diversity of life preserved at the GGNRA that much more unique and astounding.

While the National Park Service retains the discretion to ban dogs from the GGNRA altogether because of these threats, the Park Protection Organizations believe that such a drastic measure is not warranted. Instead—and consistent with the Nation’s laws and regulations that have been in place for nearly 60 years—the regulations allowing dogs in most of the park, so long as they are properly leashed, should be implemented and enforced. These reasonable regulations protect pets, wildlife, people, and the park so that the GGNRA’s exceptional resources will be preserved for present and future generations to enjoy.

ARGUMENT

I. Dogs roaming off-leash greatly impact other users of the GGNRA.

The GGNRA provides recreational opportunities for millions of Bay Area residents—and the Nation as a whole—that city, county, and state parks in California have been unable to provide. With so many potential users, the GGNRA has inevitably required compliance with reasonable safeguards to ensure that no park visitor will be harmed by another’s infringing use. The National Park Service’s leash law is a classic example of these reasonable safeguards: it provides accommodations to a variety of interest groups, while ensuring that no one’s recreational activities will be infringed.

However, because the leash law has not been enforced at the GGNRA, off-leash dogs have repeatedly injured people and have infringed on the experiences of many park users. Just over the past several years in the GGNRA, there have been dozens of incidents resulting in unwanted physical contacts between dogs and people.⁸ Many of these users have claimed that their experiences at the park have been ruined by off-leash

⁸ See, e.g., ex. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 (three attacks), 13, 14, 15, 16, 18, 19, 20, 21, 22, 92, 93, 25. At least thirteen of these contacts involved bites or other serious injuries to the victims. Ex. 3, 5, 7, 8, 12 (two attacks resulting in serious injuries), 19, 21, 22, 92, 24. At least three incidents resulted in children being knocked down. See, e.g. ex. 18, 20. In addition to directly injuring park users, at least two rangers have been injured rescuing dogs that ran over cliffs. Ex. 87.

dogs.⁹ The GGNRA has a duty to everyone living in the Bay Area to provide reasonable safeguards and protections to all users at the park, and this can only be done effectively through promulgation and enforcement of the National Park Service's pet management regulations.

A. Since September of 2000, dozens of off-leash dogs at the GGNRA have harmed park visitors.

Roaming off-leash dogs in the GGNRA are a significant hazard to GGNRA visitors, and unfortunately this hazard has caused many serious injuries to park users. Promulgating and enforcing the National Park Service's leash law at the GGNRA would eliminate nearly all of these attacks.

There have been thirteen serious physical injuries in the GGNRA in just the past several years that have resulted from unwanted contacts with unleashed dogs.¹⁰ In one attack, 14 year old Tina Phan was with friends at Rodeo Beach in the GGNRA when she encountered two unleashed dogs. When the dog's owner told Ms. Phan that the dogs were friendly, Ms. Phan began to pet one of them. She was then attacked and bitten on the face, receiving severe physical and emotional injuries, trauma, stress, and pain and suffering, and had to be taken by ambulance to Marin General Hospital for emergency medical treatment. Specifically, Ms. Phan received torn lips, severed cheek muscles and skin, and puncture wounds. Ms. Phan now has permanent scars on her upper and lower lips and surrounding cheeks, and has lost some sensation in that area of her face. She continued to suffer mental, physical, emotional, and nervous pain for at least one year after the incident. As a result of the attack Ms. Phan required physicians, surgeons, and

⁹ Ex. 15, 27, 28, 29, 25.

¹⁰ See, e.g., ex. 5 (dog bite victim who could not ascertain whether off-leash attacking dog had current rabies vaccination due to owner's absence); 7 (dog attacked horse causing injuries to horse and rider); 8 (dog attack causing facial injuries that required an ambulance); 12 (two attacks resulting in serious injuries, one of which caused a horseback rider to be trampled); 14 (victim's arm broken by dog jumping on her); 22 (horseback rider received ankle injury after being thrown from horse that was chased by dogs); 92 (off-leash dog bit two people while attacking their leashed dogs); and 24 (victim bitten by off-leash dog that attacked her leashed dog).

therapists, and her family incurred significant medical expenses from being forced to employ those medical professionals to care for her. Ex. 21.

Horses and their riders in the GGNRA have been attacked by off-leash dogs numerous times in the recent past, resulting in serious injuries to the riders and an injury to a bystander in the way of an escaping horse. During the past few years, there were at least ten reports or complaints of dogs chasing or attacking horses in the GGNRA, three of which involved injuries to the riders.¹¹ Ex. 32, 7, 30, 33, 12 (recounting four incidents, one of which is the same as ex. 7), 31, 22, 34. In one attack, a horseback rider and his horse were attacked by two off-leash dogs on the beach. The horse and rider both received serious injuries, the dog was euthanized later that day, and other riders were terrified by the attack. Ex. 7, 12. In another attack, a girl had to be helicoptered off the beach due to being trampled by a horse that was being chased by an off-leash dog. Ex. 30. In still another attack, the rider was barely able to avoid trampling people on the beach due to being chased by an off-leash dog. Ex. 31. Another rider received an ankle injury after being thrown from a horse that was being chased by an off-leash dog. Ex. 22.

Persons walking leashed dogs have been knocked down by unleashed dogs attacking leashed dogs, sometimes causing injury.¹² A man who regularly walks his leashed dogs at Crissy Field was knocked down by off-leash dogs attacking his leashed dogs, injuring his knee. Ex. 13. On a separate occasion while walking his leashed dogs, the same man was knocked down again by attacking off-leash dogs. Id.

¹¹ See, e.g., ex. 7 (horse and rider injured by attacking dog, dog put down); 30 (girl helicoptered off beach after being trampled by horse that was being chased by off-leash dog); 12 (four incidents, including two injuries to riders); 31 (rider barely avoided trampling people on beach while her horse was being chased by off-leash dog); and 22 (rider eventually fell off his horse and was trampled after horse was chased at length by off-leash dog).

¹² Ex. 6 (off-leash dogs knock over person walking leashed dogs), 13 (man knocked down twice by attacking off-leash dogs).

Three persons with leashed dogs were bitten by off-leash dogs that attacked their leashed dogs.¹³ A husband and wife were walking their dog on a leash along Milagra Ridge in the GGNRA when an off-leash dog “came out of the brush” and attacked the leashed dog. The husband was bitten in the upper thigh by the off-leash dog, and the woman was bitten in the finger. Ex. 92. Another woman was walking her leashed dog at Fort Funston when it was attacked by two off-leash dogs. The woman picked up her dog by the collar in an attempt to stop the altercation and was bitten on the leg by one of the attacking off-leash dogs.

Off-leash dogs, often playfully, jump on people who do not wish to experience that physical contact. In one incident, a woman received a broken arm from being jumped on by an off-leash dog at Fort Point. Ex. 14. Another park user was jogging at Fort Point when an off-leash dog suddenly darted in front of him, causing him to come “crashing down” onto his left hip and both kneecaps. The dog’s owner was 25 feet away at the time. Ex. 3. These incidents point out the fact that even “friendly” dogs can cause serious injuries if they are not leashed, as there is no evidence that these dogs meant any harm or were acting in a vicious manner.

¹³ Ex. 92 (man and wife walking leashed dogs bitten by off-leash dog attacking the leashed dogs); 24 (woman bitten by one of two off-leash dogs that attacked her leashed dog).



Crissy Field, May 24, 2003. An off-leash dog trips a jogger.

Because of their small size and limited strength, small children can be easily injured by off-leash dogs, and such injuries can traumatize a child long after the physical injuries are healed. Unfortunately there have been at least five reported incidents of unleashed dogs seriously threatening or knocking over small children at the GGNRA.¹⁴ This results in additional and unnecessary risks of injury for families with small children if they visit areas where dogs are allowed off-leash. To fairly balance the interests of all park users without prohibiting dogs completely, the GGNRA must promulgate rules requiring dogs in the park to be leashed.

¹⁴ Ex. 35 (off-leash dog trampled two year old); 36 (two-and-a-half year old twin girls assaulted and traumatized by off-leash dogs); 18 (children knocked down and terrified number of times by off-leash dogs); 45; and 20 (off-leash dogs knocked over children on Baker Beach).

B. Charging and growling off-leash dogs frighten visitors and hamper their ability to enjoy the GGNRA.

Since 2000 alone, there have been dozens of complaints or reports of unleashed dogs frightening people by charging or growling at them.¹⁵ One Crissy Field visitor was almost attacked by an off-leash dog. A “handler” had to get between the victim and the dog to prevent the victim from being physically harmed. The victim felt that his life was threatened. Ex. 47. In another incident, a jogger at Fort Funston was approached by two large off-leash dogs that were 100 yards from their owner. The dogs growled and barred their teeth at the jogger. Ex. 48.

There have been at least 13 reports of unleashed dogs causing general apprehension and fear of using the GGNRA.¹⁶ Most of these incidents involved large dogs or children, where apprehension of an attack causing serious injury is reasonable. In at least one instance the incident caused the visitors to leave.¹⁷ Ex. 45. In another instance, the victim was afraid for his or her life. Ex. 47. A parent reported that she is afraid to let her children “get out of arms reach because of all the dogs that are off leash [in the GGNRA].” Ex. 55. One parent had to abandon a seven month old in order to grab his two year old who was being charged by a large off-leash dog. Ex. 54. The

¹⁵ See, e.g., ex. 38 (off-leash Boxer approached visitor and growled at her continuously); 39 (park visitor chased for over 100 yards by off-leash dog); 40 (large off-leash dog ran straight at naturalist); 41 (park user scared by off-leash dog barking at him); 42 (victim frightened by 40 dogs, almost getting “taken out”); 43 (jogger charged by growling off-leash dog); 44 (park visitor approached “in a menacing way by large dogs”); 45 (off-leash pit bull ran up to children, ages two and five); 46 (park visitor “constantly frightened” by off-leash dogs); 47 (visitor felt life threatened by large off-leash dog); 48 (jogger approached by two large off-leash dogs that growled and barred their teeth at him); 49 (off-leash dogs at Stinson Beach approached children with food, parent feared that dogs might bite children attempting to get food); and 50 (ranger chased by off-leash dog near Battery Davis).

¹⁶ Ex. 51; 52 (visitor feels it is dangerous to walk at Crissy Field); 2; 53 (Crissy Field user with osteoporosis is afraid of large off-leash dogs that could cause a fall); 54 (Crissy Field user’s small child charged by off-leash dog); and 55 (parent afraid to let children “out of arms reach” at Ocean Beach due to off-leash dogs).

¹⁷ Again, it can be reasonably inferred that most people who have been frightened by dogs at the GGNRA do not file a report. They simply leave and do not return.

problem of dogs frightening people would not exist, or would at least be greatly lessened, if dogs were leashed.

C. Off-leash dogs are more likely to leave behind dog feces in the park, reducing the recreational value of the GGNRA.

There have been at least 17 complaints of dog walkers¹⁸ failing to clean up their dog's feces.¹⁹ There were also numerous complaints of negative park experiences due to odors from dog urine and feces.²⁰ An off-leash dog defecated directly in front of one family. Ex. 4. As happened in this incident, persons with off-leash dogs often fail to pay attention to their dog's actions and thus are unaware of defecations. Additionally, there is no way for a dog walker to even know whether his or her dog has defecated, let alone clean it up, if the dog is a good distance away due to being off-leash. Likewise, there is no way for a walker with multiple off-leash dogs to keep track of the dogs' defecations. On the other hand, a walker with a leashed dog will be aware of the dog defecating and thus will be able to clean it up.

¹⁸ Dog "walker" refers to anyone walking a dog or dogs, regardless of whether the walker is the owner.

¹⁹ Ex. 57; 58; 53; 4 (off-leash dog defecated directly in front of a family); 59; 60; 61; 37; 46; 17; 62 (off-leash dog defecated on trail at Crissy Field, walker refused to clean up); 63 (off-leash dog defecated on flower bed in Sutro Park, walker not present); 64 (off-leash dog defecated on Ocean Beach, walker merely covered feces with sand); 65 (off-leash dog with no walker present defecated on dunes on Ocean Beach); 66 (off-leash dog defecated on Ocean Beach, walker had no bag to clean it up); 67 (two off-leash dogs defecated on Ocean Beach, walker not present); and 62 (owner refused to remove feces).

²⁰ Ex. 69 (smell of dog urine and feces at Crissy Field is overwhelming); 4 (smell of dog feces at Crissy Field permeates the air); 70; and 71.



Fort Funston, July 6, 2005. An off-leash dog defecates at the park while its owner walks away, apparently oblivious to the dog's defecation.

Dog feces left on the ground not only ruins the park experience for many visitors due to its unsightliness and odor, it is also a health hazard. Ex. 60. As it is far more likely that walkers will clean up after their dogs if those dogs are leashed, dog feces left on the ground is one more reason that dogs should be leashed in the GGNRA.

D. Off-leash dogs in the GGNRA create other considerable dangers to people and otherwise ruin their park experiences.

There are at least two reports of unleashed dogs creating serious traffic hazards by running onto roads, endangering the animals and causing drivers to swerve in order to avoid hitting them. Ex. 72, 73. There were also two complaints of unleashed dogs potentially causing harm to disabled people. Ex. 11, 74. There was one complaint that an unleashed dog urinated on a visitor's "belongings" (Ex. 35), complaints of unleashed dogs attempting to take food or otherwise disturbing meals (ex.. 57, 69, 4, 15, 75), and a complaint that the presence of unleashed dogs in or near water prevents people from fishing (ex. 76).

E. Off-leash dogs prevent individuals with service animals from using the GGNRA.

Off-leash dogs pose a significant challenge to individuals who rely on service animals to help them enjoy the GGNRA. A 2003 survey conducted by a national guide dog user group indicated that 89% of individuals with service animals have had their guide dogs interfered with by off-leash dogs, and 42% of graduates have had their guide dogs attacked by off-leash dogs. Ex. 77. Because of this, organizations such as Guide Dogs for the Blind recommend that their graduates avoid any place where off-leash dogs are known to roam. Thus, the failure to enforce the leash law in the GGNRA has exposed those with service animals to a high-risk of interference or attack, and in most cases have precluded these individuals from enjoying the park altogether.

II. Running dogs off-leash at the GGNRA puts the welfare of dogs at great risk.

Like driving without a seatbelt, walking a dog off-leash is an activity that is inherently risky. While the general public is well attuned to the risks an off-leash dog poses to children, the elderly, and wildlife, few people understand that the greatest risk is often borne by the dog itself. At the GGNRA, this has been particularly true: literally hundreds of off-leash dogs have been lost, injured, or killed while roaming the park off-leash.²¹

The threats facing off-leash dogs in the GGNRA are numerous. High-speed automobile traffic along the Great Highway and Skyline Boulevard borders the park at Ocean Beach and Fort Funston—both of which are places where the National Park

²¹ This is likely an underestimate of the actual number of dogs harmed by off-leash dog walking since the inception of the GGNRA. This estimate is based solely on incidents that have been reported to the Park Service and subsequently published in an incident report. An unknown number of altercations are never reported to the Park Service; similarly an unknown number of reported altercations are not recorded in incident reports. Thus, it is likely that the actual number of off-leash dogs injured at the GGNRA is substantially higher than the conservative numbers used for the purposes of this petition.

Service's leash law is consistently ignored—and dogs have ran into traffic, been struck by cars, and killed while walking in the park off-leash.²² High, crumbling cliffs at Fort Funston and Mori Point pose a danger to off-leash dogs, and several dogs have fallen off of, or become trapped upon, the sides of these cliffs, requiring rescue.²³ At Crissy Field—and for that matter, throughout most of the GGNRA—the landscape is so large and topography so varied that it is not possible to consistently monitor a dog's off-leash behavior, and has resulted in numerous lost dogs, dog fights, and bites.²⁴ In some portions of the park dogs have even been preyed upon by wild coyotes. See ex. 82.

Because of the risks associated with running dogs off-leash, responsible animal welfare organizations around the country have established minimum standards and essential safeguards to ensure that dogs can engage in off-leash recreation without harm. These safeguards include (1) adequate fencing—that dogs cannot dig under or jump over—to ensure that dogs will not get lost or wander into dangerous situations; (2) an appropriate acreage so that—if fights or other emergency situations arise—dog owners

²² For example, on August 13, 2004, a dog was seen in the middle of Skyline Boulevard, causing traffic to swerve out of the way at speeds near 50 miles an hour. See ex. 78. The dog had escaped from its owner after being walked at Fort Funston, apparently without a leash. Id. (noting that no leash was found in the dog owner's possession). Remarkably the dog was returned to its owner unharmed.

However, a German Shepard/Standard Poodle mixed-breed dog was not so lucky. After being walked at Fort Funston, the dog was startled by a loud noise and ran away from its handlers. A few days later the dog was found dead on the side of the road, struck and killed by automobile traffic. Another off-leash dog owned by a Presidio YMCA member was hit by a park ranger driving an official vehicle. Ex. 72.

²³ For example, On December 11, 2004, Park Rangers rescued an off-leash dog that fell off the cliffs at Fort Funston, see ex. 79; on September 26, 2004, an off-leash Doberman Pinscher was rescued from the cliffs at Fort Funston, along with the dog's owner, see ex. 80; and on October 11, 2004, a yellow Labrador Retriever ran off the cliffs at Fort Funston chasing a ball, requiring another rescue attempt. See ex. 81. Additional examples are cited below.

²⁴ For example, on September 1, 2004, a Bull Terrier was lost at the South end of Baker Beach. See ex. 83; on November 16, 2004, a woman was cited for walking at least four off-leash dogs simultaneously at Fort Funston, one of which had previously bitten another dog at the park. See ex. 84. Additional examples are cited below.

can quickly reach their pets to address the situation; (3) consistent monitoring to ensure that poorly behaved dogs are removed before altercations occur; and (4) regular maintenance to ensure that the area remains a clean and healthy place for dogs to play.

However, none of these safeguards exist at the GGNRA. For example, there are no fenced off-leash areas in the park, and the primary areas where off-leash dogs are found—Ocean Beach, Fort Funston, and Crissy Field—are enormous areas that dog owners cannot easily monitor or rapidly cover if altercations arise. Absent these basic protections, it is not responsible to take a dog to the GGNRA off-leash.²⁵ As shown below, unfortunately, people continue to allow dogs to roam off-leash at the GGNRA, to the detriment of literally hundreds of dogs.

A. Off-leash dogs have been injured and killed at the GGNRA falling off steep cliffs.

The GGNRA contains several scenic properties with towering, wind-swept cliffs that descend steeply to the ocean below. These cliffs are one of the visual splendors of the park, and were mentioned by Congress on numerous occasions when the GGNRA was established. See, e.g., 1972 U.S.C.C.A.N. 4850, 4852. However, in many places these cliffs are also quite dangerous: their steep windward sides are often hidden from visitors approaching from the leeward side until the last possible moment. Numerous signs warning visitors to stay well away from cliff’s edge are thus posted throughout the GGNRA.

However, dogs of course do not derive any benefit from these postings, and numerous visitors have watched in horror as their off-leash dog was injured or killed after bounding off the edge of a cliff. Indeed, on January 15, 2005, a park visitor was

²⁵ Indeed, the American Kennel Club, a nationwide organization that promotes responsible dog ownership and basic good manners for dogs through a “Canine Good Citizenship” program, actively promotes compliance with leash laws as a cornerstone of responsible dog ownership. See ex. 85.

recreating near the cliffs at Mori Point²⁶ with his 1 ½ year old mixed-breed dog. The dog was not wearing a leash. At approximately 2:00 p.m., the dog “ran off” the cliffs at Mori Point, falling nearly 200 feet to the beach below. Although Park Rangers initiated a rescue investigation almost immediately, it took rescuers nearly an hour to locate the dog. At the time it appeared that the dog was in “bad shape but still alive.” Unfortunately, by the time the dog was secured for transport and reached the top of the cliffs, “the dog was not moving and appeared to be lifeless.” See ex. 86.

Sadly this is not an isolated event at the GGNRA. In the year 2000 alone the GGNRA rescued 15 dogs—along with two dog owners who attempted to rescue their dogs but became stranded themselves—from the cliffs at Fort Funston, a popular but extremely dangerous place for some park visitors to flout the National Park Service’s leash law. See ex. 26. At least two of these dogs were injured, as were two Park Rangers, during the rescue attempts. Id.

Each of these incidents could have been prevented if the National Park Service had promulgated and enforced the reasonable leash law at the GGNRA. A simple leash would have ensured that these pets would not unwittingly bound over the edge of a cliff, protecting the dog’s life and keeping Park Rangers from placing their own lives at risk to rescue the off-leash dog.

B. Off-leash dogs have been involved in literally dozens of dog fights and dog bites at the GGNRA.

The GGNRA is renowned for its vast open spaces nestled into a cosmopolitan urban setting. While this open space is an essential component of the park, it presents an immense challenge to individuals who insist on allowing their dogs to roam the park off-leash. Unfortunately, too many dogs and their owners are not up to the challenge, and literally dozens of dogs have been harmed in physical altercations while roaming off-

²⁶ Mori Point is a relatively recent acquisition to the GGNRA located in Pacifica, CA that links the adjacent National Park lands of Sweeny Ridge and Milagra Ridge. Mori Point is clearly posted with signs explaining that pets must be leashed. See ex. 86.

leash. For example, on September 4, 2004, a Pit Bull was off-leash²⁷ at Ocean Beach when it attacked another dog and “locked onto it.” See ex. 88. Fortunately the Pit Bull’s owner was able to break up the altercation, but the bitten dog was bloodied and suffered injuries to its neck. Id. Just over a month later, a Shepherd-mix bit a Weimaraner, inflicting a wound in the Weimaraner’s hind leg that required stitches through several layers of muscle. Both dogs were off-leash, and the owner of the Weimaraner was so far from his dog that he did not even witness the attack. See ex. 89.

In one of the most brazen rejections of the National Park Service’s leash law, on February 6, 2005, the owners of a large Husky were cited for repeatedly allowing their dog to roam off-leash in the GGNRA near Mori Point—the very place where a dog plunged to its death a month earlier. The dog owner “lets the dog run until he is ready to come home,” and claimed that if “it was left alone it would come home.” See ex. 90. When asked to leash the dog by a Park Ranger, the dog owner asserted that the Park Ranger “did not know anything about [this] breed since they do what they want.” Id. The dog owner nonetheless attempted to leash the dog for over 10 minutes, but was unable to leash or verbally control the dog. The Park Ranger issued a citation to the dog owner, and warned that the dog could be impounded if it was observed running off-leash in the future. Id.

A few minutes later, while the Husky was still roaming off-leash in the area, the Park Ranger came across a couple walking their dog on-leash. The couple informed the Park Ranger that they “see that dog running around all the time” and that the Husky “disturbs [our] dog.” Moments later, as the couple continued their hike, the Park Ranger observed the Husky “chase [the couple] and their pet off the trail and into the bushes.” Eventually they escaped the husky, but the dog continued to roam off-leash when the Ranger left Mori Point. Id.

²⁷ It is not clear from the criminal incident report if the dog was purposefully taken off-leash or if the dog slipped its collar. In either event, the attack could have been prevented if the dog was properly leashed.

These off-leash altercations go on and on: on April 8, 2000, an off-leash dog bit a leashed dog while being walked at Crissy Field, sparking an angry argument between the owners of the two dogs.²⁸ See ex. 91. On September 15, 2004, an off-leash dog came out of the brush near Milagra Ridge and attacked an on-leash dog, biting the thigh and finger of the on-leash dog's owners. See ex. 23. The off-leash dog owner defended that her dog "was just playing." Id. On September 17, 2004, two off-leash pugs attacked and bit a 100-pound Labrador Retriever—which was also off-leash—and the Labrador's owner. See ex. 93. On February 13, 2004 two off-leash Boxers attacked a Scottish Terrier and a Giant Schnauzer while these dogs were being walked on-leash. See ex. 13. Indeed, in the past five years there have been at least 70 reported instances of off-leash dogs biting or attacking other dogs in the GGNRA. All of these incidents could have been prevented if the dogs were properly restrained on leashes; but this will only happen when the National Park Service promulgates and enforces responsible leash laws at the GGNRA.

C. Off-leash dogs pose a particularly acute risk to small dogs, which may be victimized by "predatory drift."

Because dogs have descended from wolves, they contain an innate instinct to hunt. Generally this instinct is expressed in benign activities such as chasing balls, retrieving sticks, or playing Frisbee. However, evidence is emerging that dogs can have more visceral predatory instincts triggered by other, smaller dogs, particularly when the

²⁸ At first blush it appears difficult to understand how a heated argument could occur when an off-leash dog bites an on-leash dog. After all, it is the failure to restrain the off-leash dog that increases the severity of the altercation. But in what is becoming a hallmark of irresponsible dog ownership at the GGNRA, people who allow their dogs to roam off-leash often blame the on-leash dog for being bitten. They argue that a leash, through physical restraint, causes a dog to act aggressively in a manner that an unrestrained dog would not. This argument, however, has been rejected by reputable animal welfare organizations for decades. Indeed, the Marin Humane Society recently published an article about so-called "leash aggression" explaining that it is caused by walking dogs off-leash—i.e., dogs become accustomed to doing whatever they like when off-leash and therefore throw an aggressive "canine tantrum" when they are put back on a leash. Dogs that are properly trained on a leash do not exhibit leash aggression. See ex. 94.

smaller dog panics or appears injured. This phenomenon is referred to as “predatory drift” because an otherwise well-behaved and obedient dog “drifts” into a predatory mode. According to the San Francisco SPCA, “predatory drift frequently results in serious injury or death” to the smaller prey-dog, because a bite inflicted during predatory drift incidents “is a much more serious kind of bite” than would normally occur in a regular dog fight. See ex. 95. The risk of a predatory drift event is so great that the San Francisco SPCA refuses to allow people to adopt dogs if they currently own a dog that is either less than half the size or twice the size of the new dog they wish to adopt. Id.

When dogs are allowed to roam off-leash, the consequences of predatory drift incidents become particularly dire. Without a leash or other physical restraint on the dog, it can become difficult or impossible to prevent the larger dog from attacking and killing the smaller dog. Small dogs are thus particularly vulnerable to people who walk their dogs off-leash, and thus at this time, with off-leash dogs roaming freely at the GGNRA, it is particularly risky to take a small dog to the park, even on-leash.

III. Running dogs off-leash at the GGNRA puts the welfare of wildlife at great risk.

The GGNRA contains over 100 rare or special status plants and animals. 67 Fed. Reg. 1424, 1428 (Jan. 11, 2002). In recognition of the critical importance the GGNRA plays in the conservation of these species, the park was designated as part of the Golden Gate Biosphere Reserve in 1989. Id. In addition, the park contains literally thousands of other species, many of which find refuge in the park as either localized residents or migrating visitors.

The GGNRA has a “heightened responsibility to preserve and protect those species and their habitat everywhere they occur within the GGNRA.” Id. Unfortunately, the increasing frequency and intensity of off-leash dog walking at the park has made it exceptionally difficult to ensure that imperiled species in the park are not jeopardized. Because they are physically unrestrained and cannot understand the sensitivity of the GGNRA’s parklands, off-leash dogs are more likely to initiate activities that harm or

harass wildlife. And once initiated, harmful or destructive behaviors are more difficult to correct than those of dogs that are on-leash.

These impacts are exceptionally acute to shorebirds such as the federally listed Pacific Coast distinct population segment of the western snowy plover (“snowy plover”). The snowy plover is a diminutive shorebird that is in a race against extinction. It is believed that fewer than 2,000 adult birds remain in this population. U.S. Fish and Wildlife Service, Western Snowy Plover Pacific Coast Population Draft Recover Plan, p.7 (2001) (available at <http://pacific.fws.gov/ecoservices/endangered/recovery/snowyplover/>) (hereinafter “Recovery Plan”). However, despite the fact that potential nesting habitat for the snowy plover exists in the GGNRA; despite the fact that between 20 and 85 snowy plovers reside at Ocean Beach during the winter; and despite the fact that snowy plover nests have been found on private lands north and south of the park’s boundaries, no snowy plovers are believed to be nesting within the Park. GGNRA, Draft Snowy Plover Management Plan, Ocean Beach, San Francisco, p. 14, 48 (1998). Ex. 96. While pre-nesting activity has occurred at Ocean Beach, the nests have all failed, most likely because of the “intense level of recreation activity on the beach.” Id. at 48. Of these recreational activities, “unleashed pets represent the most significant recreational threat to wintering snowy plovers . . . because of the prolonged and repeated disturbance created when they chase birds.” Id. at 21.

Snowy plovers are believed to be particularly sensitive to disturbance by dogs compared to other recreational activities.²⁹ Lafferty, Kevin D. Birds at a Southern California Beach: Seasonality, Habitat Use and Disturbance by Human Activity, 10 Biodiversity and Conservation 1949, 1960 (2001), See ex. 56. Unfortunately snowy plovers face nearly constant harassment by off-leash dogs at Ocean Beach. Park scientists estimate that snowy plovers are intentionally chased by dogs 400 times each

²⁹ Furthermore, off-leash dogs are about twice as likely to disturb snowy plovers as leashed dogs. Lafferty, Kevin D. Disturbance to Wintering Western Snowy Plovers, 101 Biological Conservation 315, 323 (2001), See ex. 68.

winter. Draft Snowy Plover Management Plan, Ocean Beach, San Francisco, at 22. When flushed, snowy plovers must spend vital energy on “vigilance and avoidance behaviors at the expense of foraging and resting activity.” Recovery Plan, p. 58. This in turn results in decreased accumulation of the energy reserves necessary for snowy plovers to complete their annual migration and to successfully breed. Id. Off-leash dogs can thus negatively impact the survivorship and fecundity of individual birds by simply chasing them.

The Park Service’s incident reports of off-leash dogs harassing shorebirds are voluminous.³⁰ For example, on February 1, 2005, during the snowy plover’s residence at Ocean Beach, a Park Ranger witnessed an off-leash dog running along the high tide mark and “chasing birds from the flotsam as it went along.” See ex. 102. The Park Ranger contacted the owner of the dog, and after ascertaining that the owner was providing false information to him, informed the owner that the park had “concerns with pets off-leash within the Snowy Plover habitat area” and proceeded to write the dog owner a ticket. The dog owner then became “belligerent” and claimed that the Park Ranger was only issuing the citation “because [the dog owner] is Korean.” Id.

Similarly, on April 15, 2000, a large Doberman Pinscher was seen giving chase to a killdeer—another small shorebird—in Crissy Field’s designated Wildlife Protection Area, “almost catching it in its jaws.” The killdeer was attempting to defend its nest. See ex. 103. Half an hour later, another off-leash dog approached the killdeer and “almost

³⁰ To list a few: on November 21, 2004, a Park Ranger witnessed a dog-owner throwing a ball for his off-leash dog at Ocean Beach, which promptly ignored the ball but “started running after [a] bird instead, causing the bird to fly away.” See ex. 97. On October 26, 2004, a Park Ranger witnessed an off-leash dog run through a group of shore birds “multiple times, causing the birds to scatter, without the owner noticing.” See ex. 98. On January 22, 2002, an off-leash Golden Retriever growled and barked at a horseback rider, and then chased birds off the beach. See ex. 99. On January 9, 2004, an off-leash dog jumped into the Sutro Baths and began chasing after a bird, which had to take flight to avoid being caught by the dog. See ex. 100. And on October 10, 2004, a small off-leash dog chased a shorebird at Ocean Beach for approximately 50 yards. When the dog returned to his owner the dog received a treat. See ex. 101. It is unclear if the dog received the treat for chasing the bird or for returning to its owner.

grabbed [the] killdeer in [its] mouth” as the killdeer attempted to lead the dog away from its nest. The chase lasted over 30 seconds. Id. at 2. On April 17, 2000, the killdeer nest was found destroyed and the eggs gone, “with fresh dog prints and scuff marks atop [the] former nest area.” Id. at 3.

Unfortunately it is not only shorebirds that are being impacted by roaming off-leash dogs. The highly imperiled mission blue butterfly, and the habitats upon which the species depends, are also being impacted by off-leash dogs. See ex. 104. Protected marine mammals are regularly harassed and even bitten by off-leash dogs, and the endangered tidewater goby, as well as imperiled salmon, are also believed to be impacted by off-leash dogs. 67 Fed. Reg. 1428.

These impacts need not occur. Dogs and imperiled wildlife can coexist at the GGNRA, but only if the National Park Service’s reasonable leash law is promulgated at the GGNRA and enforced. See ex. 96 at 23 (Even the snowy plover may coexist with dogs but only “if significantly higher levels of [leash law] compliance can be achieved”). Because the snowy plover begins returning to the GGNRA in July, it is that much more imperative that the National Park Service initiate emergency rulemaking to ensure that the leash law can be enforced at Ocean Beach throughout the winter season.

IV. Allowing dogs to roam off-leash at the GGNRA is inconsistent with the purposes and goals of this National Park.

The GGNRA is one of our country’s boldest conservation experiments. Congress squeezed the nation’s largest urban park between some of the most expensive real estate in the country, a refuge for wildlife and city dwellers alike.

The experiment has largely worked. The GGNRA has become synonymous with the high quality of life San Franciscan’s hold dear, intertwined with our identity as much as the Golden Gate Bridge and the 49ers. It props-up property values, provides recreational opportunities for thousands of visitors, and creates an oasis for a variety of wildlife species.

The boldness of Congress' urban national park experiment was evident from the inception of the GGNRA. Congress noted that, although regional and local parks such as Golden Gate Park and the Berkeley Hills provide much needed recreation space for the Bay Area, there was still a need to bring the values preserved in the National Park System closer to people. Congress found that "many families in this urban impacted area do not enjoy the affluence which would enable them to take advantage of the outdoor recreation areas located even as close as the Point Reyes National Seashore," and that while the GGNRA "will not add significantly to the open lands in the city, [] it will ensure its continuity as open space for the use and enjoyment of present and future generations of city-dwellers." 1972 U.S.C.C.A.N. 4850, 4851-52.

The cornerstone of Congress' national urban park experiment was to ensure that the GGNRA was not managed as if it were another city playground or ball field. Instead, Congress commanded that the GGNRA be preserved "as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area." 16 U.S.C. § 460bb (emphasis added). As such, Congress further commanded that recreational and educational uses "shall" only occur if they are "consistent with sound principles of land use planning and management." *Id.*

The legislative history makes clear that Congress suspected, but did not mandate, that certain uses may be compatible with sound management of the park. For example, Congress suggested that park visitors might "fly kits [sic], sunbathe, walk their dogs, or just idly watch the action along the bay" while visiting Crissy Field. 1972 U.S.C.C.A.N. at 4852. However, contrary to assertions made by irresponsible dog owner groups advancing a voice control agenda, nowhere in the National Park Service's Organic Act, the act establishing the GGNRA, or in the relevant legislative history did Congress suggest that off-leash dog walking should be allowed: indeed, given that Congress must have been aware that the National Park System had a nationwide regulation requiring all dogs to be on-leash while visiting National Parks at the time the GGNRA was created, the only reasonable conclusion from this portion of the legislative history is that Congress

contemplated people walking their dogs on-leash while visiting Crissy Field. See Miles v. Apex Marine Corp., 498 U.S. 19, 32 (1990) (“We assume that Congress is aware of existing law when it passes legislation.”); United States v. Hunter, 101 F.3d 82, 85 (9th Cir. 1996) (Ninth Circuit “presume[s] that Congress is knowledgeable about existing law pertinent to the legislation it enacts.”) (internal quotations omitted).

Nor does the fact that Congress established the GGNRA as a National Recreation Area, rather than a National Park, change the applicable principles of land management. As a preliminary matter, Congress mandated that the GGNRA be managed in accordance with the National Park Service’s Organic Act, 16 U.S.C. § 1 et seq., as amended and supplemented. 16 U.S.C. § 460bb-3. The Organic Act itself requires that all units of the National Park System be managed “to conserve the scenery, and the natural and historic objects, and the wildlife therein and . . . leave them unimpaired for the enjoyment of future generations.” 16 U.S.C. § 1. Furthermore, in the past when the National Park System attempted to manage Recreation Areas in a less protective manner, Congress amended the Organic Act to prohibit such artificial distinctions:

[T]he national park system, which began with establishment of Yellowstone National Park in 1872, has since grown to include superlative natural, historic, and recreation areas in every major region of the United States . . . ; that these areas, though distinct in character, are united through their inter-related purposes and resources into one national park system as cumulative expressions of a single national heritage; . . . and that it is the purpose of this Act to include all such areas in the System.

16 U.S.C. § 1a-1. (emphasis added). As pointed out in Bicycle Trails Council v. Babbitt, 1994 U.S. Dist. LEXIS 12805 (N.D. Cal. 1994) (aff’d, 82 F.3d 1445 (9th Cir. 1996)), a case that dealt specifically with management at the GGNRA, “[the National Park Service] interpreted Congress’s amendments to the Organic Act to be clear in the message that [the National Park Service] . . . was to manage all units of the park system so as to effect the purpose of the Organic Act—primarily resource protection.” Id. at *18.

The National Park Service has already determined, through notice and comment rulemaking, that the entire National Park System must have reasonable leash laws enforced in order to effect the purpose of the Organic Act. Yet the GGNRA has failed to enforce the leash law for decades, resulting in great degradation to the park. It is precisely for this reason that the National Park Service must promulgate and enforce the leash law at the GGNRA. The essential purpose of Congress' urban national park experiment at the GGNRA is to bring wildness closer to people. The GGNRA gives people who otherwise cannot or will not drive to Death Valley or Yosemite an opportunity to be exposed to things more than human. This of course applies to those without the fiscal resources to travel to our distant National Parks, but it also provides opportunities for the over-worked and time-stressed individuals who, because of life's daily grind, cannot scrape the time together to visit far-away places. For these individuals and the rest of us living in civilization, urban national parks such as the GGNRA provide an oasis of hope for a sustainable society. As Congress recognized, National Parks, as opposed to city, county, regional, or even state parks, are uniquely positioned to make this vision become reality because of their greater resources, their relative insulation from political whims, and their less-parochial outlook.

National Parks such as the GGNRA cannot accomplish this purpose while simultaneously accommodating all forms of recreation enjoyed by the public without restriction. The National Park Service has thus recognized that the role of the National Park System is to "provide opportunities for forms of enjoyment that are uniquely suited and appropriate for the superlative natural and cultural resources found in the parks" and that the park service will "defer to local, state, and other . . . organizations to meet the broader spectrum of recreational needs and demands." 67 Fed. Reg. at 1427. In San Francisco, the GGNRA's reliance on the city of San Francisco to provide off-leash recreation opportunities is well founded. The City of San Francisco now contains approximately 27 designated off-leash areas throughout the city, and in 2002 the city adopted a final "Dog Policy" for expanding off-leash recreation into even more portions of the city. Available at http://www.parks.sfgov.org/site/recpark_index.asp?id=2181.

V. The situation at the GGNRA has been exacerbated since the National Park Service’s leash law was formally invalidated.

As shown above, off-leash dogs in the GGNRA are having significant impacts on the welfare of people, our pets, wildlife, and the park itself. The Park Service has been making a valiant attempt to protect dogs, wildlife, and the park from off-leash dogs—and in particular to protect park users from the outlandish activities highlighted above—but the task has become almost Sisyphean. Irresponsible dog owners continuously flaunt responsible animal welfare organization’s recommendations for ensuring the safety of pets and wildlife, and law enforcement officials have been unable to dedicate enough resources to ensure that the leash law is complied with throughout the park. When the park is able to enforce existing laws, Park Rangers are often presented with false information or met with intimidation tactics to try and subvert the GGNRA’s enforcement process.

Unfortunately recent court decisions have made it even more difficult for the park to cite dog owners who allow their dogs to roam off-leash and impact park resources. For example, on December 12, 2004, a Park Ranger was attempting to explain the importance of the leash law to six dog walkers who had their dogs off-leash. These individuals “surrounded” the Park Ranger and attempted to debate the Park Ranger about the Magistrate’s Order in an “openly hostile demeanor.” See ex. 105. In order to prevent the contact from escalating “into a fracas requiring additional units, [the ranger] departed the area.” Id. Similarly on March 1, 2005, Park Rangers found a dog owner with three off-leash dogs sitting off-trail in sensitive butterfly habitats, only a few hundred yards away from posted signs that contain leash law requirements and information about the endangered mission blue butterfly. See ex. 106. When told of the infraction, the dog owner became argumentative and stated “[w]e beat you at Fort Funston, and at Crissy Field, we don’t have to leash our pets.” Id. He continued, “the leash law was abolished and only applied to a few parks.” Id.

These confrontational attitudes are making it difficult for Park Rangers to protect park resources from the impacts noted above. But they are also making it more difficult

for park users to request reasonable accommodations from irresponsible dog owner groups. Unless and until the National Park Service promulgates and enforces the leash law at the GGNRA, the park's ability to protect people, pets, wildlife, and the park itself from the threats imposed by off-leash dogs will be greatly diminished.

CONCLUSION

For the foregoing reasons, the Park Protection Organizations request that the National Park Service promulgate and enforce 36 C.F.R. § 2.15(a)(2) at the GGNRA. Due to recent court decisions that have unexpectedly eliminated these reasonable protections for the first time, the Park Protection Organizations request that the regulation be promulgated on an emergency basis, and that leash law enforcement begin no later than 60 days from receipt of the petition.

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California State Senate

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REPRESENTING SAN FRANCISCO AND SAN MATEO COUNTIES



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MEMBER
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Education
Joint Committee on
Legislative Audit

December 2, 2005

Mr. Brent Plater
D. R. Patterson
1095 Market St Ste 511
San Francisco, CA 94103-1628

Dear Friends:

Thank you for your thoughtful correspondence advocating enforcement of dog leash rules at Golden Gate National Recreational Area (GGNRA). Over the years I have worked with dog owner organizations and GGNRA officials regarding off-leash behavior. In fact, in 2002 I authored SB 712 which would have created off-leash dog areas at three state parks. This bill, offered as an alternative for Bay Area dog owners who wanted off-leash parkland, led to the formation of a state task force which subsequently identified three parks that would be suitable for construction (fencing) of off-leash dog parks. Unfortunately, state budget problems derailed the projects. The SB 712 effort left me with the following conclusion:

Off-leash activity should be in areas that do not involve interaction with leashed dogs, or a fragile environment; i.e., the area should be fenced and properly noticed as to its use. For example, according to dog park experts, canine dominance factors preclude the placement of tables in dog parks—dogs jump on tables to be dominant—and problems will arise when a leashed dog is confronted by a free dog.

In brief, I agree with your concerns. I have asked my staff to contact the GGNRA to determine why leash laws are not being enforced. Since I am a state senator and the GGNRA is under federal control, I may be limited in what I can do. But, I have enjoyed a good work relationship with park officials; therefore, I will contact the GGNRA to share your concerns and the concerns of others regarding leash law enforcement. I will keep you informed of any discussions that occur related to this matter.

All the best,


JACKIE SPEIER
8th Senate District

California Department of Parks and Recreation

Pilot Program for Unleashed Dog Areas

December 17, 2001

California Department of Parks and Recreation
1416 9th Street,
Sacramento, CA 94296-0001

INTRODUCTION: In a July 9, 2001 memorandum to the District Superintendents and executive policy staff (see attached), Deputy Director Dick Troy indicated Director Areias' interest in addressing the need for off-leash dog parks in urban areas. After speaking with Senator Jackie Speier, the Director indicated his interest in testing a small number of pilot facilities in selected units of the State Park System. Recognizing potential conflicts between off-leash dogs and the Department's Mission, the following selection criteria were established by the Director for potential pilot areas.

Off-Leash Dog Parks should:

1. Not contribute to natural or cultural resources damage;
2. Not displace existing recreational activities;
3. Be enclosed, unless located in areas where there is clear and functional topographical or other significant boundaries;
4. Be located in or near urban units of the State Park System; and
5. Be located in areas having a significant number of "off-leash dog park" advocates to ensure a strong volunteer base for facility maintenance and monitoring.

Deputy Director Troy created a Task Group to examine this concept and make recommendations to the Director for his consideration. The goal of the Group was "to identify potential pilot areas, recommend minimum site requirements, and establish an evaluation program for off-leash dog areas." The Task Group consists of the following individuals:

Rick Rayburn, Chief, Natural Resources Division, Co-Chair
Laura Westrup, Planning Division, Co-Chair
Linda McKay, Co-chair of the Fort Funston Dogwalkers
Robert Herrick, M.D., California Dog Owners Group
Karin Hu, Ph.D., Off-Leash advocate, citizen scientist
Mary Ann Morrison, M.Ed., DogPACSB
Sgt. William N. Herndon, San Francisco Police Department, Vicious and Dangerous Dogs
Hearing Officer
Laura Svendsgaard, Sierra Club representative
Art Feinstein, Audubon representative
Richard Steffen, Senator Jackie Speier's office
Susan Brissden-Smith, Senator Jackie Speier's office
Jeff Price, California State Park Rangers Association
Jacqueline Ball, District Superintendent, Gold Fields District
Kathryn Foley, District Superintendent, Northern Buttes District
Tom Ward, Director's Office
Roy Stearns/Steve Capps, Communication's Office

ISSUE: The Group was given the responsibility of identifying two or three potential off-leash confined dog areas in state park units. The areas selected would be part of a pilot program to test the feasibility of this form of recreation. The program would identify minimum site design characteristics, roles, and responsibilities of the Department and its volunteers, rules governing the use of the facilities, and determine measures of success.

BACKGROUND: Off-leash dogs have not been permitted in parks owned and operated by the Department since the inception of rules governing dogs. The Department believes dogs present a potential threat to visitors, park staff, wildlife and each other, when not under the physical restraint of a leash. In addition, dogs can impact aesthetics and a “sense of peace,” therefore disturbing the park visitor’s experience.

The Department of Parks and Recreation owns, but does not operate the four park units that allow off-leash dogs in designated areas. East Bay Regional Park District (EBRPD) operates Robert Crown Memorial State Beach, Lake Del Valle State Recreation Area and the East Bay Shoreline Project (Point Isabel). The fourth site is Lighthouse Field, operated by the County of Santa Cruz.

Local park and recreation agencies throughout California have operated off-leash dog-park areas for the last 35 years. As land increasingly becomes developed in highly urbanized communities, dog owners are turning to larger land management agencies to establish off-leash areas for their pets. Over 5 million Californians own a dog; there are over 7 million dogs in California. Many urban dwellers do not own property or have very small yards and prefer parks and other open space areas to exercise with their dogs and to socialize with other dog owners and handlers. Urban dwellers have a myriad of other recreational needs that are frequently met by the local agency provider, such as play areas and sports fields.

PROCESS: The Group met twice over a two-month period for several hours at a time. Between meetings, various members toured potential sites, and discussed the feasibility of off-leash dog areas. Group discussions were often marked by lively debate on the criteria for site selection, suggested rules and regulations, site design and characteristics, locations, measures of success, and the appropriateness of off-leash dog areas in state park units. The Group’s deliberations culminated in the recommendation of unit selection and practices for two pilot sites and two future sites.

The Group reached consensus on the two units in which enclosed dog areas could be taken further in the process of site planning, environmental review, design, funding, and construction. It should be noted that two factions exist within the group, neither of which is totally satisfied with the outcome. *Primary disagreements* within the Group are over the selection criteria established by the Director at the beginning of the effort.

- The first group, represented by dog-park advocates, believes that enclosed areas have drawbacks in terms of dog and owner/handler experience. They would like to see, in addition to the enclosed dog parks, open-trail segments in State Parks (five units were suggested) be made available for off-leash dog use. However, this goes beyond the initial criteria.
- The second group believes that enclosed dog parks should not be established within units of the State Park System and that they would be more appropriately located and operated by local park and recreation agency providers. This position conflicts with the primary purpose of the effort – selection of pilot units for enclosed off-leash dog use. This same group is strongly opposed to off-leash dogs on open trails.

The Group reviewed in detail eleven potential units for off-leash dog use. Five were dismissed, as they were also proposed for trail use and therefore inconsistent with the original project parameters. The remaining six, which appeared to meet the criteria for pilot off-leash dog parks, were reviewed with the District Superintendents, focusing primarily on feasibility. While reviewing park units for pilot-project implementation, the team also prepared recommendations to assist the Districts in designing the dog-park areas, roles and responsibilities of State Park staff and volunteers, suggested dog park etiquette, and the measures of success.

ANALYSIS:

1. Unit Selection: Pilot sites were selected for their minimal impact to natural resources and compatibility with existing and future uses. In applying the project parameters to unit selection, the initial review focused primarily on state recreation areas (SRA) within or near urban areas. The list was later expanded to consider other units. The following units were identified as possible candidates:

Folsom Lake State Recreation Area, Sacramento County
Candlestick State Recreation Area, San Francisco County
Prairie City State Vehicular Recreation Area, Sacramento County
San Buenaventura State Beach, Ventura County
Kenneth Hahn State Recreation Area, Riverside County
California Citrus State Historic Park, Riverside County

A. Folsom Lake State Recreation Area: Local support exists for an off-leash dog park at Folsom Lake SRA; however, a general plan is currently being prepared and concerns for potential conflict with other recreational activities exist. In addition, potential damage to natural resources (oak woodlands) could occur.

B. Candlestick State Recreation Area: A bayside area, roughly three acres in size, was identified as having several user benefits, including ample parking and informal walking paths. However, one of the areas being considered may require additional fill and may be cost prohibitive. On the plus side, since it is located adjacent to the bay, cost for fencing would be reduced. Strong local support exists for an off-leash dog-park area at this unit, which could lead to a large number of volunteers. The existing general plan calls for future group camping and day-use activities in one of the suggested project areas.

C. Prairie City State Vehicular Recreation Area: The potential exists for an off-leash dog-park at this state vehicular recreation unit managed by the Off Highway Motor Vehicle Recreation Division (OHV). However, at the time this report was generated, an off-leash dog-park advocacy group had yet to be identified. It is recommended that this site be considered as a future location after a volunteer group has been identified. Division management indicates that all improvement costs will come from non-OHV funds due to restrictions on the use of OHV funds.

D. San Buenaventura State Beach: A potential dog-park area was identified in an overflow parking/camping, special event, non-beach area that is not heavily used from October through April. Due to seasonal camping/parking use, little or no additional resource impacts would be expected, but the CEQA review will provide more specific analysis of potential impacts. If

operated in the off season (fall-winter months), little or no impacts to recreational activities is expected to occur. Strong advocacy support in the Ventura area exists.

E. Kenneth Hahn State Recreation Area: This unit in the Baldwin Hills south of Culver City is partially owned by DPR, but operated by the County of Los Angeles Department of Parks and Recreation. The County of Los Angeles and the planning consultants are in the process of preparing a general plan. A potential dog-park site has been suggested as a possible use in the southern area of the park near other active recreational facility amenities. However, not all land in this area has been purchased by the Department and priority uses for existing public land has not yet been established. It appears further acquisitions need to occur before a dog park site is determined, designed and constructed.

F. California Citrus State Historic Park: This is the only unit on the “considered list” that is not a state recreation area or a state beach. State Historic Parks are established to preserve and interpret key historic or prehistoric places, events, and practices in California. Rural citrus agriculture is preserved and is interpreted at this unit in Riverside County. The impact of a dog park even outside the historic core area could significantly conflict with the rural agricultural sense of place.

2. Supporting Measures: The team reviewed a number of suggestions within topical areas that could provide assistance to project managers responsible for designing and developing the pilot dog parks, field staff responsible for the dog-park operation, and users of the dog parks. Topical areas include (1) Desired site design characteristics, (2) Roles and responsibilities, (3) Suggested dog-park etiquette, and (4) Measures of success.

All but a few of these specific suggestions were supported by group consensus. Many of these ideas came from locally-operated off-leash dog parks in California. It was agreed that some of the specific suggestions may or may not be used, depending on site characteristics or the potential cost factors. For example, water for dogs and owners/handlers is desirable, but may create a prohibitive expense, and is therefore, would be impractical. In such cases, owners/handlers could provide their own water. Roles and responsibilities of park staff and volunteers will depend, in part, on existing District volunteer programs and superintendent preferences, but the group did not want to encourage volunteers to become the enforcers of the rules. The group did not come to consensus on one issue related to aggressive dog behavior, where several members wanted park access restricted to neutered male dogs, or at least have the owners/handlers possess behavior certification. Due to difficulties regarding the enforcement of this rule, this report does not include this suggestion.

Measuring the success of a pilot dog park was broken down into four areas: (1) dog owner’s/handler’s evaluation, (2) facility impact on other park visitors, (3) safety of site users and, (4) environmental impacts. Much of this information requires fieldwork, surveys, and analysis. The cost of measuring success can be significant and should be factored into other operational costs as well as initial design and construction costs. Environmental measures and early assessment should be done during the general plan amendment process.

3. General Plan Amendment: The need for a general plan amendment for the construction of an off-leash dog park at a park unit was reviewed with DPR legal staff. Given Public Resources Code requirements for general plan approval prior to construction, park general plans not addressing dog parks should be amended before construction.

RECOMMENDATIONS:

1. Units For Pilot Projects: It is recommended that the Department move forward at the units below for planning and developing enclosed off-leash dog parks.

A. **Candlestick State Recreation Area:** A potential site has been identified, however, improvement costs, wetland restoration or other factors may determine that this location is not the preferred site. If it is determined that the site has significant limiting factors, an alternative location within the park should be sought.

B. **San Buenaventura State Beach:** A site with little resource or recreational use conflicts has been determined and should be pursued as a dog park for six months of the year. During months of peak recreational use, the site is used for overflow camping or for special events.

2. Other Unit Conclusions: For items A & B listed below, it was determined to be premature for the Department to plan and/or develop dog parks, however, as conditions change in the near future, it may be feasible to move forward.

A. **Prairie City State Vehicular Recreation Area:** There is no known local dog-park advocacy group to assist in planning/operating a dog park at this unit. If this changes, the Department will consider moving forward with a project.

B. **Kenneth Hahn State Recreation Area:** Since Los Angeles County operates this unit, they would be initially responsible for planning and developing a dog-park facility. However, land acquisition needs to occur and the status of the general plan indicates it would be premature to move forward at this time. Local dog park advocates may want to advance discussions with the County in 6-12 months. The Department should be included in these discussions.

C. **Pacifica State Beach and Dockweiler State Beach:** During the last few weeks, some Group members and public unleashed-dog advocates have suggested that off-leash beach areas be provided at these two park units. Both units are owned by the Department, but are operated by the City of Pacifica and the County of Los Angeles, respectively. These units were not considered for pilots by the Group for two reasons: (1) they could not be enclosed, (i.e. conflict with selection criteria), without presenting significant conflicts with other park values, and (2) both areas will be subject to near-future western snowy plover recovery planning and management efforts.

Local advocates may discuss their desires with the appropriate operating entity. However, the Department, which must approve amendments to general plans and operating agreements, should be included in these discussions.

3. Design Characteristics and Roles and Responsibilities: The following criteria are suggested to assist project managers, District staff that operates and evaluate parks, volunteers, and users.

A. **Desired Site Design Characteristics:**

- At least two acres or more surrounded by a 4' to 6' fence with adequate drainage.

- Double-gated entry area with possibly two separate entry gates and a 20' vehicle/maintenance gate.
- Parking available nearby.
- Clear and well-placed signage for posting rules of etiquette and an information board for park information.
- Shade and water for both the dog and the owner/handler, and seating (away from the fence perimeter).
- Covered trashcans and plastic bag dispenser station.
- ADA compliant.
- Allowance for informal walkways/trails within the enclosed facilities.
- Designed in such a way that other recreational uses could occur.
- Siting, improvements and materials not to impact aesthetics, including entrance area.

B. Roles and Responsibilities:

Department will:

- Provide leadership required with this program.
- Provide overall coordination of volunteers.
- Provide the land for off-leash dog-park facilities; process a general plan amendment and appropriate CEQA compliance where necessary.
- Design and oversee construction in accordance with CEQA compliance. The design will be a collaborative effort with volunteers, where possible.
- Provide normal grounds maintenance (not including cleaning up after dogs).
- Measure, assess, or otherwise evaluate impacts on resources and visitors.
- Provide cost estimates for new or renovated off-leash areas and provide necessary regulatory permits.

Volunteers will:

- Provide regularly scheduled site clean up.
- Distribute park rules to new users by handouts, bulletin-board posts, or through verbal conversations with other site users.
- Stock receptacles with plastic bags.
- Assist with monitoring, use of facility, and gathering of information related to measures of success.
- Work through District Superintendents or his/her designated representative regarding maintenance needs and establish priorities for repair and renovation.

Advocacy Groups will:

- Meet as needed with park staff to discuss successes, issues, problems, and recommendations.
- Organize volunteers to donate labor and materials, or funds for site improvements.
- Organize off-leash training sessions or other permitted special events.
- Assist in developing and distributing education information.
- Solicit and identify funding for amenities, programs, and improvements not provided by the Department.

C. Suggested Dog Park Etiquette:

- Dogs must be leashed prior to arriving and leaving the designated off-leash area. Owners/handlers must carry one leash per dog while in an off-leash area.
- Dogs must be properly licensed, inoculated against rabies, and healthy. No dog less than four months of age is permitted in the off-leash area.
- Female dogs in heat are not permitted within a dog park.
- Aggressive and menacing behavior is not allowed. Any dog exhibiting aggressive behavior must be removed from the facility immediately.
- Owner/handler shall carry a suitable container and/or equipment for removal and disposal of dog feces. Dog feces shall be immediately removed and properly disposed of in the covered trashcans.
- Dogs must be in sight and under the control of the owner/handler at all times.
- No more than three dogs per owner/handler is allowed in the facility at any one time.
- An adult must supervise children under the age of 14.
- The facility is open only during posted hours.
- Owners accept responsibility for the actions of their dogs.

D. Measures of Success:

The following measures are based upon the overall purpose of an off-leash dog area. The data collection instruments, such as surveys, questionnaires, assessments, and reports, are stated in general terms. Further development of these instruments is necessary when specific site implementation occurs.

Purpose of Off-leash Dog Areas:

The purpose of off-leash dog areas is to provide a safe and enjoyable recreational experience to dog owners/handlers and their dogs, while not impacting park visitors or the environment.

Measurements:

1. Dog owners/handlers: The satisfaction level of owners/escorts with the facility and the experience. The frequency of use and number of visits (to be included as a part of the owner/escort survey).
2. Other visitors to the park: The satisfaction level of park visitors without dogs (This information will be gathered as a part of the park's on-going Visitor Satisfaction Survey conducted by staff). Note: this should be a question which compares the compatibility of the pilot dog park with visitor expectations or with the Department's mission, not asking people in different areas about something remote to them.
3. Safety of dogs and park visitors: Incidents of injuries to dogs and or visitors. Park staff will gather this information as a part of the normal procedure for reporting visitor injuries, crimes, or other incidents.
4. Environment: The type of environmental assessment will be tailored to meet the needs of the selected sites. The initial criterion for site selection is based upon an initial assessment of minimal impact to the identified area. Finer levels of monitoring

and evaluation will be applied based upon the unique attributes of each of the pilot sites after the completion of a general plan amendment. Environmental assessment will be the responsibility of Department staff.

NEXT STEPS: After review of this report, and if it is acceptable to the Director, it is recommended that the following steps in the order indicated below be accomplished. Target completion dates are estimated assuming that full effort begins by August 1, 2002 at the point when the Department has completed the majority of work on the \$157 million deferred maintenance program, a high priority workload.

- Schedule General Plan Amendments – Consult with the Planning Policy and Program Committee to determine impact on DPR's general plan schedule. January 10, 2002.
- Project Manager – Identify a project manager for any project to be carried forward. May 1, 2002.
- Preliminary Cost – Assign the appropriate staff member to develop estimated preliminary costs for off-leash dog parks at Candlestick SRA and San Buenaventura SB. Costs should be itemized so non-essential improvements, such as shade or water, can be identified if scaling down becomes necessary. July 31, 2002.
- Funding – Determine source of funding for projects to be carried forward. July 31, 2002.
- Processing General Plan Amendments – Initiate work on general plan amendment(s), including environmental assessment, environmental measures of success, and user measures of success. December, 2002.
- Design – Design the project, complete the PRC 5024.5 process, and perform CEQA analysis. Secure necessary permits. February, 2003.
- Commence construction. March, 2003.

It is expected that the steps above may be completed two months earlier for the San Buenaventura State Beach project due to relatively straightforward park and site conditions.

DURATION OF PILOT PROJECT: The pilot dog-park areas should be operated for two years from opening before formal evaluation of the program. It is estimated that the evaluation period would be during the six months following the two-year anniversary of opening.

State of California – The Resources Agency

Memorandum

Date: July 9, 2001

To: District Superintendents
Executive Policy Staff

From: Department of Parks and Recreation
Park Operations

Subject: Pilot Program for Unleashed Dog Areas

Formal unleashed dog areas have multiplied throughout the US in recent years. Here in California, State Senator Jackie Speier introduced legislation (SB-712) calling for a review of specific State Park units as potential locations for such dog facilities.

On June 13, 2001, in discussions with Senator Speier, Director Areias expressed support for meeting the demand for this growing recreational pursuit in California, particularly in urban areas. However, he also identified several political, operational and resource constraints related to any broad application of this activity in the State Park System. At the conclusion of the discussion, he committed to testing a small number of 'pilot' facilities in selected units of the State Park System. The selection of these pilots would involve discussions with supporters for unleashed dog areas, as well as groups who have concerns about such areas.

Further discussions with the Director clarified the basic criteria for selecting 'pilot' unleashed dog areas in the State Park System. These areas should:

- Not contribute to natural or cultural resource damage;
- Not displace existing recreational uses;
- Be enclosed, unless located in areas where there are clear and functional topographical or other boundaries;
- Be located in urban/near urban units of the State Park System;
- Be located in areas having a significant number of 'unleashed' supporters to ensure a strong volunteer base for maintenance and monitoring;
- Be located in units that have supportive operations management.

To begin the process, I am chartering a task group to identify potential pilot areas, recommend minimum site improvements and to establish an evaluation program. The task group will be jointly chaired by Rick Rayburn, Chief of the Natural Resources Division and Laura Westrup of the Planning Division and will consist of:

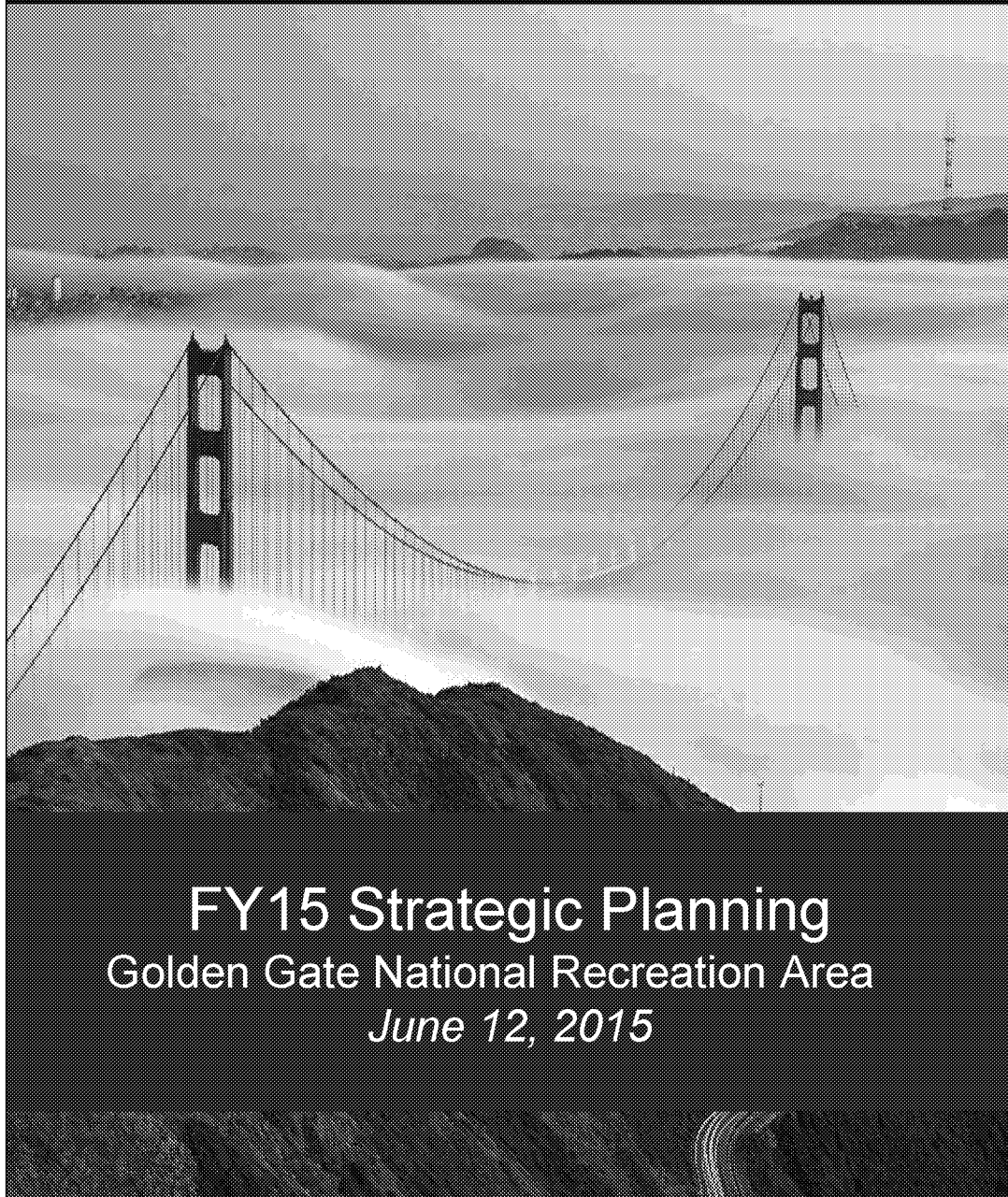
- 4 supporters of unleashed dog areas
- 1 member of Senator Speier's staff
- 1 representative of CSPRA
- 1 representative of the Audubon Society
- 1 representative from the Sierra Club
- Various DPR staff (including 2 District Superintendents)

The goal of the department is to have 2 to 3 pilot unleashed dog areas open, operating and being evaluated by the spring of 2002. We all know the sensitivity that this subject carries among the majority of our staff. I am asking that we all keep an open mind as we take a small step to test the compatibility of this activity in the State Park System.

If you have questions, feel free to call or e-mail Rick or Laura.

<original signed>
Dick Troy
Deputy Director

cc: Bill Berry
Ron Brean
Steve Treanor
Steade Craigo
Carol Nelson
Donna Pozzi
John Shelton



FY15 Strategic Planning
Golden Gate National Recreation Area
June 12, 2015

1. Park Update, Centennial Update (Roth, 15 minutes)
2. Workplace and Workforce Enrichment - 2 year plan following up from Employee Survey (Treutelaar/Martin, 25 minutes)
3. Use of Public Land Corps authority to hire (Treutelaar/Martin, 20 minutes)
4. July 4 / Fleet Week Incident Command and Preparation (Feierabend, Cochary, 15 min)
5. Administrative Updates and Reminders (Treutelaar, 20 minutes)
6. Other Announcements, Questions, Answers, etc.

Overview of Strategic Plan





Realizing a Thriving Workplace Culture

GGNRA's team, working relationships and workplace environment are as exceptional as the park resources we collectively strive to protect and promote. Our employees, both individually and as teams, are empowered to thrive and reach their maximum potential. Our park team increasingly reflects the diverse population of the greater bay area and multiculturalism is promoted throughout the organization.

GOALS

1. **Improve employee safety and wellness** through institutionalized practices that promote a safety-first culture, increase awareness, reduce accident rates, and increase participation in wellness activities.
2. Employees have **access to appropriate work space and technology**, as well as to inviting, quality common spaces that foster collaboration.
3. The park **workforce is strengthened** through targeted recruitment and professional development practices, intentional succession planning, and employee recognition.
4. Park employees increasingly identify as a single, integrated team and **promote cross-functional and multicultural teamwork** in fulfilling our common mission.

Separate safety and wellness into separate goals?



Achieving Operational Excellence

GGNRA exemplifies the leadership, expertise, investment, and flexibility for a thriving park operation to sustain and enhance the park's breadth of resources and enhance a valuable experience for park visitors. Resources are invested carefully and strategically, with the understanding that actions taken today will assure the long-term viability for the park to not just endure but thrive.

GOALS

1. To better align employee efforts with desired results, reduce workload associated with routine park functions, increase capacity, and achieve efficiencies, internal **park processes are rethought, streamlined, clearly defined, and readily implemented parkwide.**
2. **Increase financial sustainability** to maintain or improve upon current service levels and resource protection.
3. The park strategically **invests in its critical infrastructure and assets** to ensure the park's most-used areas are safe, resilient, and managed to optimize sustainable use within capacity.

Separate safety and wellness into separate goals?



The Park as a Catalyst for Change: Improving Lives, Communities and Environment

GGNRA is dedicated to improving the lives of all Americans by acting as an agent for social and environmental change. In particular, local youth and their families experience the park as an inclusive and equitable place where they can access resources that improve our collective wellbeing.

GOALS

1. The park's reach **extends beyond its boundaries** to establish it as an integral part of local, ethnically and socioeconomically diverse communities in support of a healthy and thriving Bay Area.
2. Park facilities and programs promote the **engagement of urban populations** who are most in need of access to safe, healthy and free public lands.
3. Park facilities and programs also support **relevant and inclusive visitor experiences** in which people have the opportunity to engage in dialogue about current environmental and social issues and move from understanding into action.
4. An **increasing number of young people participate in park programs** that promote positive youth development, civic engagement and sense of ownership of these public lands.
5. Employees within all disciplines and at all levels of the organization are encouraged and **equipped with the knowledge, skills and tools to be agents for social and environmental change.**

Separate safety and wellness into separate goals?



Connecting People with the Park

Extending the management philosophy of "*Connecting People with the Parks*" which is expressed in the new GMP, **we are increasingly attentive to the factors that still pose difficulties to people seeking enjoyable, meaningful, and safe visits in the park.** These continue to be deficiencies **communicating** real-time site conditions with the public, providing diverse and sustainable **transportation** options for getting to and around the park, and managing visitation based on the **capacities** of sites in order to avoid crowding and other undesirable conditions.

GOALS

1. Readily available **digital information complements on-site personal services** for more **effective trip planning** and **meaningful visits** to a spectrum park locations.
2. Critical **deficiencies in transportation and visitor-serving facilities are remedied** to improve the visitor's experience of **arriving at the park** and **satisfaction with their visit.**
3. Sophisticated **visitor management tools guide access to and among popular sites** resulting in improved resource preservation and enhanced experiences.



Creating Meaningful Community Dialogue and Collaboration

By employing a variety of user friendly tools and techniques, we will foster a dynamic two-way conversation with the full spectrum of park stakeholders, including national constituencies and those who do not currently visit national parks, to provide meaningful and timely information on park projects, policies, and programs to these stakeholders, and to receive meaningful input in return. In addition, we will augment our highly successful existing multi-agency and cross sector partnerships with several new collaborations to leverage the community engagement benefits inherent in these partnerships.

GOALS

1. Public involvement and community engagement activities are **proactive, genuinely two-way, transparent, easy to access, and open to all**. We will form long-term, sustained relationships with the **broad spectrum of local and national stakeholders and neighboring communities to assure that information flow is timely and that our stakeholders have authentic opportunities to be heard and to understand how their input is considered in shaping future decisions in the park.**
2. We will develop new partnerships and collaborative efforts around multiagency and cross-sector issues such as coastal climate change resiliency and visitor facilities and opportunities to **amplify the collective impact of these partnerships across boundaries and jurisdictions.**

Separate safety and wellness into separate goals?

Alcatraz Stewardship & Embarkation

The National Park
Service
Department of the
Interior



This signature initiative preserves an iconic National Historic Landmark and welcomes and engages visitors to a world class experience.

- **Implement Alcatraz Ferry Embarkation Plan**
- **Complete Seismic Stabilization Cellhouse Exterior**
- **Complete Seismic Stabilization Quartermaster Warehouse & Implement Reuse Plan**
- **Cliff Stabilization**
- **Rehabilitate Fixed Wharf**
- **Stabilize Building 64**
- **Implement Bird Management Strategy**
- **Repair & Maintain Small Scale Features & Gardens**

Separate safety and wellness into separate goals?

Dog Management Implementation



The Dog Management Plan is fully implemented.

- **Finalize Dog Management Regulations (Rule) in CFR**
- **Complete Dog Management Plan & FEIS**
- **Complete & Implement Monitoring Plan**
- **Implement Dog Management Strategies**
- **Conduct Proactive Outreach & Education**
- **Proactively Enforce Dog Management Regulations**

Separate safety and wellness into separate goals?

Muir Woods & Redwood Creek Implementation

The National Park
Service
Department of the
Interior



The ecological integrity of the watershed and visitor experience are enhanced through major projects and partnerships.

- **Improve Creek Habitat For Salmon in Muir Woods**
- **Realign and Upgrade Roads, Trails & Bridges in the Watershed**
- **Implement Parking & Shuttle Reservation System For Muir Woods**
- **Upgrade Site Transportation & Visitor Infrastructure**
- **Complete & Implement Visitor Monitoring Plan**
- **Upgrade Site Utilities (Water & Sewer)**
- **Pursue the goals in the Redwood Creek Watershed Vision & General Management Plan**

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Separate safety and wellness into separate goals?



Make Rancho Corral de Tierra fully functional as a unit of the park that manages the natural and cultural resources and provides national park experiences

- **Develop Master Plan for Equestrian and Visitor Facilities, Trails, and Resource Management**
- **Incorporate Long-term Maintenance and Operational Strategy**
- **Develop Regional Transportation Strategy with Partners**
 - **Enhance Public Transportation Options**
 - **Construct Main Trailhead(s)/Parking Area(s) Off of Highway 1**
- **Facilitate Improved BMPs with Equestrian Partners**
- **Expand On-Site Stewardship**
- **Build Upon and Improve Community Relationships**

Separate safety and wellness into separate goals?

Climate Smart Adaptation



The park will engage in Climate Smart Adaptation planning in order to be more resilient to Climate Change.

- **Conduct Parkwide Vulnerability Assessment (Exposure, Risk & Adaptive Capacity)**
- **Develop Climate Smart Adaptation Plan for One Coastal Area Impacted by SLR**
- **Develop Climate Smart Adaptation Plan for Upland Habitat**
- **Participate in Climate Adaptation Planning with Adjacent Land Managers**

Separate safety and wellness into separate goals?

Crissy Corridor & New Parklands



Fully realize the potential of the Crissy Corridor & Main Post Landscape.

- **Plan & Implement Crissy Refresh Including SLR Analysis, Torpedo Wharf, Promenade, CFC**
- **Participate in design and implementation for Park Presidio & NP3**
- **Implement New Crissy Field Center & Learning Landscape**
- **Open Presidio Visitor Center to the Public**
- **Rehabilitate PRES 643 for Maintenance Facility**
- **Rehabilitate PRES 662 for Museum Management Program**
- **Restore Quartermaster Reach & Connect to Crissy Marsh**
- **Implement Crissy Corridor Transportation Plan**

Separate safety and wellness into separate goals?

GGNRA Dog Policy Comments

Overview

I am submitting a comment to request reconsideration of the preferred option for dog management on the section of Ocean Beach between Stairwell 21 and Sloat Blvd (i.e., the Snowy Plover Protection Area (SPPA)). The draft EIS lists the preferred option as, “Alternative F: Preferred Alternative. Dog walking under voice and sight control would be allowed in an approximately 0.71 of a mile-long beach ROLA from Stairwell 21 to the northern end of the beach. Dogs would be prohibited south of Stairwell 21 to the Fort Funston boundary but would be allowed on leash on the approximately 2.84 mile Ocean Beach Trail east of the dunes adjacent to the Great Highway.” I suggest an alternative option to allow on-leash dog walking year-round in this section with off-leash access north of Stairwell 21.

I live in the neighborhood and primarily access Ocean Beach at Noriega St. I have a family with small children. I do not own a dog but have fostered a dog. I have a PhD from UC Berkeley in Environmental Science, Policy, and Management and have a career as an environmental scientist. I am also an avid nature lover. Therefore, I am submitting my comments from the combined perspectives of an environmentalist, a local family, and someone who understands the needs of many dog owners in my community.

I walk or jog on the beach multiple times per week between Stairwell 21 and Sloat Blvd. I also visit the beach regularly with my kids and have walked our foster dog there (on-leash) for the few months she was with us. Over the years that we have lived in the neighborhood, I have been to the beach hundreds of times – sometimes jogging, sometimes bird-watching, sometimes with a friend walking a dog, sometimes picnicking with my family. One thing that has become clear in all my visits is that this stretch of beach is an integral part of the Outer Sunset/Parkside community. While some people may want a policy that promotes their own use to the exclusion of others, I think it is critical to develop a policy that allows the mixed uses of those who live in the neighborhood – and this needs to include those who own dogs and need a place to walk them. My primary comment is that a year-round leash requirement in the SPPA with off-leash access north of Stairwell 21 would allow most of the uses of visitors and the community to compatibly occur, while protecting the snowy plover. Those that prefer an off-leash dog experience could walk, jog, or even drive (if needed) to the area north of Stairwell 21 to accommodate that need. Many people walk/jog the length of the beach to exercise themselves and their dogs – this is only possible if dogs are allowed south of Stairwell 21 (see below comment on why the Ocean Beach Trail is not an acceptable alternative). I recognize and respect that many visitors do not prefer to see dogs chasing wildlife nor be approached by unfamiliar dogs. In fact, this is my own preference. The section of the draft EIS on Park Operations explains that a no-dog policy would be implemented as follows: “Enforcing a “no dogs” regulation would require law enforcement documentation of violations in sites where dogs would be prohibited. Although visitors with dogs in prohibited areas would be clearly in violation of the regulation, staff would still be required to monitor the site and issue citations to noncompliant visitors. Violators would quickly learn the consequences of their actions and, over the long term, compliance would result in fewer infractions... Following the initial education and enforcement period, impacts to park operations would be long term, negligible to minor, and adverse.” If the GGNRA is willing to enforce and educate a no-dog policy, why would it not be able to do the same for a leashed-dog policy? A

leashed-dog policy with better compliance would respect the needs of those who do not want interference from dogs but would still allow those with dogs the needed access to the beach.

Alternative for Leashed Dog Walking on the Ocean Beach Trail

The draft EIS suggests that the impact on not being able to walk a dog on-leash on the beach is minimal because dog walking could be moved to the Ocean Beach Trail. Having walked a dog (and small children) on the Ocean Beach Trail, I would assert that it is not an acceptable alternative given the incompatible use by bicyclists who ride too quickly to make it safe to walk there with dogs or children. The path is only 8-10 feet wide (and narrower in spots with significant ice plant encroachment) and has no lines. It is common to have bicyclists come whizzing up from behind with no warning. I have myself nearly been hit multiple times while jogging on the path (note that I do not wear headphones). I don't have my children walk on the path and I have seen small dogs get yanked out of the way at the last minute due to speeding bicyclists. A path with only 4-5 feet of room in each direction and bicycles whizzing by is not an acceptable alternative to the option of on-leash walking on the beach. The draft EIS mentions the area adjacent to the Ocean Beach Trail as useful to dog-walking. Clearly those who suggest this have never walked on the trail as it is almost exclusively ice plant and almost impossible to walk on. Relocating leashed dog-walking from SPPA to the Ocean Beach Trail is not a safe option, especially given the numbers of dogs that would then collectively be walked on the trail without separation of bicyclists from the dog-walking area.

Compliance

The draft EIS compared on-leash impact with non-compliance in the SPPA to no dogs assuming compliance; however, the EIS did not provide any justification for the assumption that enforcement of a no-dog policy in the SPPA would have any better rate of compliance. The GGNRA would need to compare a no-dog policy with non-compliance to an on-leash dog policy with non-compliance in order to justify any claim of a beneficial impact. If the GGNRA intends to enforce a no-dog policy in the SPPA then it would need to compare a no-dog policy with enforcement and compliance to an on-leash dog policy with enforcement and compliance.

Environmental Consequences for Special Status Species: Impact of Dogs on Snowy Plovers Specifically at Ocean Beach

One of the primary reasons given in the draft EIS for prohibiting dogs from the SPPA is the need to protect snowy plovers, which I support. The draft EIS bases its recommendation on the 2007 Recovery Plan for Pacific Coast Population of the Western Snowy Plover which states, "Dogs on beaches can pose a serious threat to snowy plovers during both the breeding and nonbreeding seasons. Unleashed pets, primarily dogs, sometimes chase snowy plovers and destroy nests. Repeated disturbances by dogs can interrupt brooding, incubating, and foraging behavior of adult plovers and cause chicks to become separated from their parents (USFWS 2007a, 63)." The draft EIS then uses studies (e.g., Lafferty, 2006 and 2007), which were conducted in Southern California, to assert that dog disturbance negatively impacts snowy plovers and cites a 1997 study at Ocean Beach of high numbers of dogs chasing snowy plovers. Based on these studies that are either not specific to the area in question or >15 years out of date, the draft EIS states that off-leash dogs "can" chase plovers and "could" harm them in the SPPA but provides no factual information to support that this actually happens in the SPPA. While this assertion is theoretically true, the on-the-ground information collected by the GGNRA but not described in

the draft EIS does not support the rationale that dogs in the SPPA in recent years, leashed or not, have a negative impact on the snowy plovers at this particular beach. The information that I collected by reviewing papers and reports from the GGNRA contained the following information – these sources were cited but the information below was not discussed in the draft EIS:

- According to the 1996 Plover Report, the annual median number of plovers between 1988 and 1996 at Ocean Beach was 28. Previous counts between 1979 and 1985 showed snowy plover counts at Ocean Beach of 2-14. The 2006 Snowy Plover Report shows an increase in snowy plovers in the SPPA after 2001 to a higher stable median number in the mid-thirties as of 2005 (Hatch 2006). The 2007 and 2008 addendums to this report do not report the median number of plovers but give the maximum number of 49 for the 2007 survey year (the average maximum for 2002-2005 was 48). Regardless of the various dog policies in the SPPA the number of snowy plovers has been stable, if not increasing, in recent years.
- The number of dogs, both leashed and unleashed, increased from 2000-2005 in the SPPA and yet the 2006 Snowy Plover Monitoring Brochure (see Figure 1 in the brochure) shows that snowy plover numbers increased during this time. The 2006 seasonal leash requirement decreased the number of off-leash dogs but the over-winter plover numbers did not increase.
- According to the 1996 Plover Report, the number of people on the beach only explained between 11 and 16% of the variability in plover numbers during the two study years. The number of dogs explained even less of the variability in plover numbers: "the number of dogs per hour on the beach explained only 10 and 12% of the variation in plover numbers for 1995-1996, respectively. Factors other than number of people and dogs, possibly beach slope and width, appear to exert greater influence over snowy plover numbers at Ocean Beach." This was found when the level of leash control was only 10%, according to the report.
- Lafferty (2001) found that plovers in southern California were intensely disturbed only slightly more by humans than by off-leash dogs (28% and 31%, respectively, of the plovers who were disturbed flew) while 61% of plovers disturbed by crows flew.
- Researchers like Lafferty have pointed out that plovers are closer to the dunes - this tends to not be where the dogs are. Wintering snowy plovers are less frequently disturbed than most other shorebirds because (1) snowy plovers are relatively hesitant to move or fly from a person or dog and (2) snowy plovers roost in the dry sand away from most foot traffic (Lafferty, 2001a and 2001b).
- The 1996 Plover Report found that most plovers roost near the promenade between Noriega and Rivera. This is not a popular dog area so there is natural separation. The 1996 Plover Report also stated that snowy plovers are not susceptible to the same degree of chasing as sanderlings and other shore birds.
- The draft EIS provides older data from the 1997 report that had higher numbers of dogs chasing plovers but did not present its more recent data from the 2006 Snowy Plover Report that does not show this to still be occurring very much, if at all. For example, dogs chased the plovers on 4 occasions in the 2005 study period. This is over an average survey year of 39 surveys and 59 survey hours (2007 Hatch Plover status report). The addendum to this report for 2007 (Hatch 2008) states that there were 30 surveys during this survey year with only 1 incident of a dog chasing a plover.

Since the GGNRA has information on dog and snowy plover patterns in the SPPA, the draft EIS should present and address this information. Further, it seems there should be information more current than 2008 but this is not in the references nor mentioned in the text. In my opinion as a scientist, the information presented in the draft EIS did not represent an objective review of the information that the GGNRA has available to it. My review of the information that is available from the GGNRA suggests that on- and off-leash dogs can and do disturb snowy plovers in other areas but this is generally not occurring in the SPPA at Ocean Beach. This appears to be the case regardless of whether the dogs are on- or off-leash, primarily due to the spatial separation of where dogs walk/run and where the snowy plovers roost. In the SPPA, data indicate that the level of disturbance by off-leash dogs is similar to that of disturbance by humans, suggesting that a dog ban is no more justifiable than a human ban (although a policy on the control of Corvids may be worth studying). The data also suggest that the numbers of snowy plovers that roost in the SPPA is not related to the dogs since the numbers of snowy plovers are unrelated to the changes in dog and leash policies in the SPPA over recent years. In general, GGNRA data for the SPPA part of Ocean Beach show that the snowy plover numbers are stable and unrelated to dogs (leashed or unleashed). Some researchers (e.g., Fahey and Woodhouse, 1995) have found that leashed dogs have less impact than unleashed dogs in other areas so a conservative approach to snowy plover protection could include a leash requirement, although local information does not suggest that this is actually necessary.

Environmental Consequences Other than Those for Snow Plovers:

I also reviewed the environmental consequences listed in the draft EIS that did not pertain to snowy plovers. Below is an overview of the consequences listed in the draft EIS, along with any pertinent comments.

- **Vegetation and Soils:** The draft EIS indicates no impacts except minor for coastal communities under the current policy. This assumes a benefit from compliance from a no dog policy. Using common compliance assumptions for a no-dog policy and a leashed-dog policy would likely result in no difference in benefit between these two options.
- **Wildlife (other than special status species):** The only impacts listed are in the section on wildlife in coastal communities. The impacts are similar to snowy plover impacts, although no other species are threatened or endangered. Similar to the snowy plover, there was no information provided to indicate harm to birds or more impact than from people in the SSPA.
- **Special-status Species:** See above regarding snowy plover.
- **Cultural Resources:** No cultural resources to consider.
- **Visitor Use and Experience Impact:** The draft EIS determined that there are long-term moderate adverse impact for those who want dogs versus those who don't – either choice results in adverse impacts on the other. However, the draft EIS did not consider a leashed-dog policy with better compliance, which could mitigate adverse impacts for those who prefer no dogs while creating minor adverse impacts for those who want and off-leash policy.
- **Park Operations:**
 - The draft EIS states, “Short-term moderate to major adverse impacts on park operations would be expected at sites where current dog walking would change from allowing on-leash or voice control dog walking to prohibiting dog walking. Enforcing a “no dogs” regulation would require law enforcement documentation

of violations in sites where dogs would be prohibited. Although visitors with dogs in prohibited areas would be clearly in violation of the regulation, staff would still be required to monitor the site and issue citations to noncompliant visitors. Violators would quickly learn the consequences of their actions and, over the long term, compliance would result in fewer infractions... Following the initial education and enforcement period, impacts to park operations would be long term, negligible to minor, and adverse."

- The draft EIS claims moderate to major short-term impacts to implement a no-dog policy and then negligible to minor long-term adverse impacts. As stated above, there was no justification given for why resources could be provided to enforce a no-dog policy but not for a leashed-dog policy.

- Human Health and Safety:

- In the section on Human Health and Safety, the draft EIS states that, "Between 2008 and 2011, a total of 969 pet-related incidents were recorded at this site. Pet-related violations included 89 leash law violations, 77 cases of visitors walking dogs in closed areas, 22 hazardous conditions violations (including 21 dog bites/attacks/aggressive behavior), and 2 pet excrement violations (table 36). Violation of the Ocean Beach SPPA resulted in the most violations (729). No unattended pet violations were documented at this site between 2008 and 2011." The impacts are listed as, "Long-term moderate to major adverse impacts," with a rationale of, "Site experiences high use; a large number of violations, including dog bites/attacks and pet rescues have been recorded."

- This summary in the bullet above of pet-related incidents is perplexing, as are the conclusions regarding impacts for the following reasons:

- First of all, the specific cases listed only add up to 190 pet-related incidents - what were the other 779 incidents? Are we to assume they were irrelevant?
- With regards to leash law violations, see the earlier points on compliance which would be greatly minimized if the GGNRA conducted an enforcement program similar to what it has listed for implementation of a no-dog policy.
- With regards to visitors walking dogs in closed areas, I do not know what closed areas exist in the SPPA. I am guessing this is related to the area that was closed north of Stairwell 21 when sewage washed up, which would be unrelated to dog management issues.
- With regards to pet excrement, anyone who walks on a city sidewalk would think that 2 reported incidences over a 3-year period is a low number. I personally find it unconscionable that anyone would leave pet excrement in any public space but I have generally noticed very few incidences of dog excrement in my hundreds of times in the SPPA. Unfortunately, this is not true of the city sidewalks.
- With regards to dog aggression/biting, the risk is actually extremely low. The draft report provided statistics of dog aggression but did not provide total numbers of dogs. Over a 3 year period they cite 21 reports of aggressive behavior but out of how many dogs? I looked through various references for dog numbers. The 2006 plover report gives a rough estimate

of 10 dogs per hour encountered. Assuming 12 hours of dog walking time per day, this would result in 120 dogs per day or 43,800 dogs per year. Over 3 years (2008-2011; 1095 days) this would be 131,400 dogs. Twenty-one aggressive encounters out of 131,400 dogs is 0.016%. This is a very low number. Even halving the number of dogs and doubling the number of reported incidences of aggression results in a number less than 0.1%. Moving all these dogs to the Ocean Beach Trail or sidewalks, with less room to spread out, would probably create an issue rather than solve one. Unless the draft EIS assesses impacts of displaced dogs on trail/sidewalks, the claim that a no-dog policy is beneficial to health and safety cannot be claimed. Further, it should be made clear what the level to trigger moderate to major impacts is since the levels of violations and aggression seem very low or potentially solved by an enforced on-leash policy.

- Sustainability and Long-term Management: The draft EIS states that “Alternative F (Preferred Alternative) provides balanced visitor use and the protection of natural resources and visitor safety, and would best meet the objectives for the plan/EIS.” I do not agree that the preferred plan offers a balanced approach to Ocean Beach.

Summary

My objective in submitting a comment is to urge a more balanced review and approach to Ocean Beach. I am not trying to poke holes in the draft EIS but rather trying to point out areas that the GGNRA did not fully consider or present, which are resulting in an approach to Ocean Beach that does not meet the needs of the majority of the users as well as other options could. I am not necessarily pro-dog but I feel that a dog ban has neither sound basis nor provides a balanced approach. The section of Ocean Beach is, for the most part, not a “visitor-focused” beach, especially between Lincoln Ave. and Sloat Blvd. For example, there is no parking lot nor any trails. It is part of the neighborhood. I am not suggesting that this means that the needs of the neighborhood take precedence but they must be considered, and if there is an option that balances the needs of the community with those of visitors and special species, then this option should be preferred. My suggested option is: Dog walking under voice and sight control would be allowed in an approximately 0.71 of a mile-long beach ROLA from Stairwell 21 to the northern end of the beach. Year-round on-leash dog-walking permitted in SPPA between stairwell 21 and Sloat Blvd. This offers a balanced approach that provides visitors and the community access while protecting the plovers and resulting in minimal adverse impacts.

Subject: Draft Agenda for Dog Mgt Plan Coordination mtg.

(Friday, 5/29: 10:00-11:00AM);

Call-in #: 1-866-732-4230, then dial Non-Responsive

A. Update on Interim Commercial Dogwalking (10:00-10:20)

- review of any issues/permits update (Katie/Noemie)
- LE interim action summary report; recent incidents(LE, USPP)

B. Rule Follow-up (10:20-10:45)

- Status of rule & timeline update(Mike)
- Outstanding Items to resolve(Mike)

C. Communications (10:45-11:00)

- FOIAs(Howard)
- updates with political reps (Howard, Chris)
- Communications strategy discussion(Howard, Mike)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

JAN 21 2014
RECEIVED
JAN 23 2014
SUPERINTENDENT'S OFFICE

Frank Dean, General Superintendent
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123
Attn: Dog Management Plan

Subject: Supplemental Draft Environmental Impact Statement for the Dog Management Plan, Marin, San Francisco, and San Mateo Counties, California (CEQ# 20130261)

Dear Mr. Dean:

The Environmental Protection Agency has reviewed the Supplemental Draft Environmental Impact Statement for the Dog Management Plan for Marin, San Francisco, and San Mateo counties. Our review and comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The National Park Service has developed a Dog Management Plan that is intended to provide a clear, enforceable policy regarding dog use in Golden Gate National Recreation Area lands. EPA provided comments on the Draft EIS on May 27, 2011 and gave the document a rating of Environmental Concerns- Insufficient Information (see enclosed "Summary of EPA Rating Definitions"). We expressed concerns with indirect impacts to lands outside the park's jurisdiction, including city and county parks that could receive additional adverse impacts regarding changes to dog use on GGNRA lands. EPA appreciates the Park Service's inclusion, in the Supplemental Draft EIS, of the additional analysis that was conducted regarding this impact, including the identification of specific parks and the potential for induced resource impacts. Based on our review of the Supplemental Draft EIS, we have rated the document Lack of Objections.

Thank you for the opportunity to review this document. Should you have any questions, please contact me at (415) 972-3521, or contact Stephanie Skophammer, the lead reviewer for this project. Stephanie can be reached at (415) 972-3098 or Skophammer.stephanie@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures: Summary of EPA Rating Definitions

#13

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

**ATTORNEY CLIENT PRIVILEGE & ATTORNEY WORK PRODUCT
FOIA EXEMPT – B. Goodyear, DOI Solicitor’s Office May 22, 2015**

DEPARTMENT OF THE INTERIOR

National Park Service

36 CFR Part 7

[NPS-GOGA- XXXXX; XXXXXXXXXXXXXXXX

RIN XXXX-XXXX

Special Regulations, Areas of the National Park Service, Golden Gate National Recreation Area (GGNRA); Dog Management

AGENCY: National Park Service, Interior.

ACTION: Proposed rule.

SUMMARY: The National Park Service proposes to amend its special regulations for the Golden Gate National Recreation Area (GGNRA or Park) regarding dog walking.. The rule would apply to approximately 20 mapped locations within the GGNRA and would designate areas within these locations that would be available for on-leash and regulated (i.e., voice and sight control) off-leash dog walking. Areas not designated as open to dogs would be closed to dogs, except for service animals in accordance with 36 CFR Section 2.15(a)(1). Within these mapped locations, the rule would supersede 36 C.F.R. § 2.15(a)(1)-(5) and the 1979 Pet Policy. Dog walking on GGNRA-managed lands not addressed in this rule would continue to be regulated under 36 C.F.R. § 2.15.

exemption 5

DATES: Comments must be received by [INSERT DATE 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER].

ADDRESSES: You may submit comments, identified by the Regulation Identifier Number (RIN) XXXX-XXXX, by any of the following methods:

- *Federal eRulemaking Portal*: [[HYPERLINK "http://www.regulations.gov"](http://www.regulations.gov)]. Follow the instructions for submitting comments.
- *Mail or hand deliver to*: General Superintendent, Golden Gate National Recreation Area, Attn: Dog Management Proposed Rule, Fort Mason, Building 201, San Francisco, CA 94123

Instructions: All submissions received must include the agency name and docket number or RIN for this rulemaking. All comments received will be posted without change to [[HYPERLINK "http://www.regulations.gov"](http://www.regulations.gov)], including any personal information provided. If you commented on the Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft Plan/SEIS), your comment has been considered in drafting the Proposed Rule. Comments submitted during this comment period should focus on this Proposed Rule, not the draft Plan/SEIS. Comments on the draft Plan/SEIS will be considered untimely because the comment period on the draft Plan/SEIS has closed. For additional information see **Public Participation** under **SUPPLEMENTARY INFORMATION** below.

FOR FURTHER INFORMATION CONTACT: , Golden Gate National Recreation Area, Attn: Public Affairs Office (Alexandra Picavet), Fort Mason, Building 201, San Francisco, CA, 94123. Phone: (415) 561-4728. Email: [[HYPERLINK "mailto:alexandra_picavet@nps.gov"](mailto:alexandra_picavet@nps.gov)]

SUPPLEMENTARY INFORMATION

Public Notice and Participation:

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Golden Gate National Recreation Area will schedule three (3) informational meetings on this proposed dog management rule during the 60-day public comment period, and provide public notice of such meetings in regional newspapers and on the GGNRA website under Park Planning. This federal register announcement and information on specific locations, time and dates of these informational meetings will be posted on the GGNRA website at: _____, and be sent to all those on GGNRA's Public Affairs Office mailing list.

Background

Authority and Jurisdiction.

Exemption 5

Exemption 5

Exemption 5

Description and Significance of Golden Gate National Recreation Area.

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Dog Management Planning and Environmental Impact Analysis.

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Proposed Rule

Exemption 5

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Golden Gate National Recreation Area Designated Dog Walking Areas

Elements common to all areas listed:

Exemption 5

Exemption 5

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Exemption 5

Uncontrolled and Unattended dogs:

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Exemption 5

Monitoring-Based Management Strategy (henceforth called the Monitoring-based Management Program)

Exemption 5

Exemption 5

Compliance with Other Laws, Executive Orders, and Department Policy

Regulatory Planning and Review (Executive Orders 12866 and Exemption 5)

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Exemption 5

Regulatory Flexibility Act.

Exemption 5

Small Business Regulatory Enforcement Fairness Act.

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Exemption 5

Unfunded Mandates Reform Act.

Exemption 5

Takings (Executive Order 12630).

Exemption 5

Federalism (Executive Order 13132).

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Civil Justice Reform (Executive Order 12988).

Exemption 5

Consultation with Indian tribes (Executive Order 13175 and Department Policy).

Exemption 5

Paperwork Reduction Act.

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Exemption 5

National Environmental Policy Act.

Exemption 5

Effects on the Energy Supply (Executive Order 13211).

Exemption 5

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Clarity of this rule.

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Public availability of comments

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Public Participation

Exemption 5

Exemption 5

List of Subjects in 36 CFR Part 7

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Table 1: Areas Open to On-Leash Dog Walking of 1-3 dogs	Areas Open to On-leash Dog Walking of 4-6 dogs under NPS Permit:
Marin County	<h1>Exemption 5</h1>

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San
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City and
County

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San
Mateo
County

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Table 2: Areas Open to Voice And Sight Control for Walking 1-3 Dogs

Areas Open to Voice And Sight Control for Walking of 4-6 Dogs Under NPS Permit

Marin County

Exemption 5

San
Francisco
City and
County

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*San
Mateo
County

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GGNRA DOG MGMT PLAN/SEIS – IMPACTS OVERVIEW FOR KEY AREAS

MUIR BEACH

- **Pref'd Alt:** On-leash dog walking allowed; no ROLA because the site is small
- **Key Resources:**
 - **Vegetation Communities** – Coastal Communities, Wetlands and Aquatic Habitat, Riparian Forest and Stream Corridors
 - **Wildlife Communities** – Coastal Communities, Wetlands and Aquatic Habitat, Riparian Forest and Stream Corridors
 - **Special-status Species** –
 - Coho salmon and steelhead trout
 - California red-legged frog
 - **Visitor Experience** – visitors walk dogs under voice control or on-leash
- **Impacts of No-Action Alternative:**
 - **Vegetation** – minor to moderate; dune communities are not well protected, are adjacent to off-leash areas and are subject to trampling and digging; wetland vegetation around the lagoon is impacted by dogs in these areas; similarly dogs gain access to Redwood Creek even though NPS has closed it as there is no physical barrier
 - **Wildlife** – minor to moderate; shorebirds are subject to chasing and other disturbance from voice control and on-leash dogs; dogs have been observed in the lagoon in spite of closures; wildlife associated with Redwood Creek habitat are also impacted by voice control and on-leash dogs; high usage by visitors walking dogs at these areas exacerbates the problems noted
 - **Special-status Species** – negligible to minor as closed areas (Lagoon and Redwood Creek) continue to have violations of the closures, dogs in these areas can impact habitat and individuals
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – moderate impacts as this is a high use area and visitors would encounter dogs off-leash throughout the site
- **Impacts of Preferred Alternative:**
 - **Vegetation** – negligible; physically restraining dogs would protect sensitive habitats and the associated vegetation
 - **Wildlife** – negligible to minor; physically restraining dogs would protect wildlife and habitat; dogs may still disturb wildlife
 - **Special-status Species** – negligible; physically restraining dogs would prevent dogs from gaining access to closed areas and would protect sensitive habitat and individuals
 - **Visitor Experience** –
 - People who prefer dogs – minor to moderate as off-leash dog walking would no longer be allowed.; on-leash dog walking would only be allowed in designated areas to beach, not to Green Gulch or in loop up Coastal trail to Miwok and back.
 - Visitors who prefer no dogs – beneficial as off-leash dog walking would no longer be allowed and on-leash dog walking would be limited to designated areas

Muir Beach Dog Related Incident Reports

On-leash dog walking or dog walking under voice control is currently allowed on Muir Beach per the 1979 Pet Policy, including the path to the beach. Park staff have observed that some dogs owned by residents at Muir Beach are not kept in yards, but instead roam off leash along the beach or in the lagoon, creek, or upland areas. Muir Beach has a post-and-cable fence along the beach side of lower Redwood Creek and lagoon to discourage visitors from accessing the water; however, the fencing does not physically exclude dogs or visitors from the area. Few commercial dog walkers use Muir Beach. A 2003 visitor experience and resource protection study at Muir Beach found that 21 percent of visitors walked their dogs at Muir Beach. When asked what they enjoyed least about the site, 22 percent cited the wind and foggy weather, while about 9 percent cited dog conflicts (NPS 2003b, 14).

Muir Beach is heavily used by visitors (beach-goers and hikers) on nice days or weekends. During the August 2011 visitor surveys, 79 percent of visitors at Muir Beach were general beach visitors and were placed in the catch-all “Other” category. Dog walking was relatively consistent on the observed day; 5 percent of dog walkers were recorded on a weekday and 6 percent were recorded on the weekend (IEC 2011, 13). During the *GGNRA Dog Walking Satisfaction Visitor Study* (NPS 2012a), when dog walkers were asked which GGNRA sites they visited most frequently, 1.9 percent indicated Muir Beach, which tied with two other sites as the eighth most frequently visited site by dog walkers. (NPS 2012a, Appendix A: 6). Muir Beach also tied as the seventh most frequently visited site by non dog walkers during that survey (3.5 percent) (NPS 2012a, Appendix A: 69).

A total of 24 dog-related violations were reported at Muir Beach from 2008 through 2011 (table 3). The most common violations were for having dogs off leash (9 violations) and having dogs within closed areas (4 violations) (table 3). There were also 2 violations for dog bites/attacks (hazardous condition) (table 3).

TABLE 3. NUMBER AND TYPE OF DOG-RELATED INCIDENTS AT MUIR BEACH, 2008–2011

Incident Type	Year				Total
	2008	2009	2010	2011	
Hazardous Condition	1	0	1	0	2
Off-leash Violation	1	6	1	1	9
Pet Excrement	1	0	0	0	1
Violation of Closed Area*	1	0	0	0	1
Possessing Pet in Closed Area*	0	2	3	0	5
General Pet Violations	0	1	0	0	1
Wildlife Disturbance	0	0	1	0	1
Other	0	0	2	2	4
Total	4	9	8	3	24

* The closed areas resulting in violations at this site include Redwood Creek and Muir Beach Lagoon (closed to humans and pets) and Coastal Trail and Bobcat Trail (closed to pets). U.S. Park Police and NPS rangers appear to cite these regulations interchangeably on incident reports, and therefore, these incidents were kept separate and not compiled in this table.

HOMESTEAD VALLEY

- **Pref'd Alt:** On-leash dog walking allowed on specified trails; no ROLA
- **Key Resources:**
 - **Vegetation Communities** – Coastal Scrub, Chaparral, and Grasslands
 - **Wildlife Communities** – Coastal Scrub, Chaparral, and Grasslands
 - **Special-status Species** –
 - Northern spotted owl
 - **Visitor Experience** – visitors walk dogs under voice control or on-leash but often on social trails
- **Impacts of No-Action Alternative:**
 - **Vegetation** – minor; caused by digging and trampling vegetation
 - **Wildlife** – minor to moderate; off-leash dog access to wildlife and habitat off trails would continue, disturbance includes digging, trampling and chasing
 - **Special-status Species** – negligible to minor as young owls could be disturbed or injured, adult owls could be stressed or physically challenged when protecting young, habitat is very limited at this site
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – minor impacts as visitors would encounter dogs off-leash throughout the site
- **Impacts of Preferred Alternative:**
 - **Vegetation** – negligible; physically restraining dogs would protect vegetation off trails and trails are a small portion of the site
 - **Wildlife** – minor; physically restraining dogs would protect wildlife and habitat; dogs may still disturb wildlife
 - **Special-status Species** – negligible; physically restraining dogs would protect the northern spotted owls and make it unlikely dogs could have access to young owls
 - **Visitor Experience** –
 - People who prefer dogs – minor as on-leash dog walking would be allowed on designated trails areas
 - Visitors who prefer no dogs – beneficial as off-leash dog walking would no longer be allowed and on-leash dog walking would be limited to designated areas

Homestead Valley Dog Related Incident Reports

On-leash dog walking or dog walking under voice control is currently allowed throughout the site. This site is primarily used by local Mill Valley residents; use by visitors other than those walking dogs is relatively low (table 1). A few commercial dog walkers have been seen using this site. There were no dog-related incidents documented recorded from 2008 through 2011 at Homestead Valley (though this may be directly-related to frequency of LE patrol)

OAKWOOD VALLEY

- **Pref'd Alt:** On-leash dog walking allowed on specified trails; no ROLA
- **Key Resources:**
 - **Vegetation Communities** – Coastal Scrub, Chaparral, and Grasslands; Native Hardwood Forests/ Douglas-Fir and Coast Redwood
 - **Wildlife Communities** – Coastal Scrub, Chaparral, and Grasslands; Native Hardwood Forests/ Douglas-Fir and Coast Redwood
 - **Special-status Species** –
 - Mission blue butterfly
 - Northern spotted owl
 - **Visitor Experience** – visitors walk dogs under voice control in designated areas; otherwise dogs are on-leash
- **Impacts of No-Action Alternative:**
 - **Vegetation** – minor; caused by digging and trampling vegetation
 - **Wildlife** – minor to moderate; off-leash dog access to wildlife and habitat off trails would continue, disturbance includes digging, trampling and chasing
 - **Special-status Species** – negligible to moderate as dogs could damage Mission blue butterfly habitat; (and also off-leash dog walking occurs more often on social trails thru MBB habitat to loop back to main fire road).
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – minor impacts as visitors would encounter dogs throughout the site
- **Impacts of Preferred Alternative:**
 - **Vegetation** – negligible; physically restraining dogs would protect vegetation off trails; trails are a small portion of the site
 - **Wildlife** – negligible to minor; physically restraining dogs would protect wildlife and habitat; dogs may still disturb wildlife
 - **Special-status Species** – negligible, existing butterfly habitat at Oakwood Valley is located away from trails where dogs would be allowed; physically restraining dogs would protect the northern spotted owls
 - **Visitor Experience** –
 - People who prefer dogs – moderate as off-leash dog walking would no longer be allowed at the site and on-leash dog walking would be in designated areas
 - Visitors who prefer no dogs – beneficial as dog walking would be limited and a no-dog experience would be possible

Oakwood Valley Dog Related Incident Reports

The 1979 Pet Policy allowed on-leash dog walking or dog walking under voice control on Oakwood Valley Fire Road and on the Oakwood Valley Trail from the junction with Oakwood Valley Fire Road to the junction with the Alta Trail. On-leash dog walking is permitted on the Oakwood Valley Trail from the trailhead to the junction with Oakwood Valley Fire Road. Visitor use in this area by hikers, runners, and bikers is considered moderate (table 1). Park staff have observed that some local dog walkers allow their dogs to be under voice control as soon as they exit their vehicles along Tennessee Valley Road, in the large, open, grassy meadow at the start of the Oakwood Valley Trail, and along the trail itself, as well as on an open, grassy hillside east of the Oakwood Valley Trail. Oakwood Valley receives use by local residents, with the majority of use occurring in the morning. Most visitors are private individuals, rather than commercial dog walkers. Park personnel have indicated dog/coyote conflicts occur in this area. From 2008 through 2011, only one incident was reported for possessing a pet in a closed area (table 2), though there have been repeated, reported conflicts between dogs on –leash and off-leash, and between dogs off-leash and visitors seeking dog free visit since 2013.

TABLE 2. NUMBER AND TYPE OF DOG-RELATED INCIDENTS AT OAKWOOD VALLEY, 2008–2011

Incident Type	Year				Total
	2008	2009	2010	2011	
Possessing Pet in Closed Area*	1	0	0	0	1
Total	1	0	0	0	1

* The closed area resulting in a violation at this site is the asphalt road into Tennessee Valley, which is closed to pets.

DROWN FIRE ROAD/FORT BAKER

- **Pref'd Alt:** On-leash dog walking allowed in specified areas and trails; no ROLA
- **Key Resources:**
 - **Vegetation Communities** – Coastal Scrub, Chaparral, and Grasslands; Native Hardwood Forests/Douglas Fir and Coast Redwood
 - **Wildlife Communities** – Coastal Scrub, Chaparral, and Grasslands; Native Hardwood Forests/Douglas Fir and Coast Redwood
 - **Special-status Species** –
 - Mission blue butterfly
 - **Visitor Experience** – visitors walk dogs on-leash in areas where dogs are allowed
- **Impacts of No-Action Alternative:**
 - **Vegetation** – minor; caused by digging and trampling vegetation
 - **Wildlife** – minor to moderate; off-leash dog access to wildlife and habitat off trails would continue, disturbance includes digging, trampling and chasing
 - **Special-status Species** – minor as dogs could damage Mission blue butterfly habitat along Drown Fire road.
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – minor impacts as visitors would encounter dogs throughout the site
- **Impacts of Preferred Alternative:**
 - **Vegetation** – negligible; areas where dog are permitted has been reduced, lessening the potential for impact
 - **Wildlife** – negligible to minor; physically restraining dogs would protect wildlife and habitat; disturbance would be possible but the areas where dog are permitted has been reduced
 - **Special-status Species** – negligible to minor, allowing dogs on Drown Fire Road would affect butterfly habitat, but the impacts would be localized.
 - **Visitor Experience** –
 - People who prefer dogs – negligible as on-leash dog walking would still be allowed at the site
 - Visitors who prefer no dogs – negligible as dogs would still be encountered throughout the site

Fort Baker Dog Related Incident Reports

Currently, on-leash dog walking is allowed in the Fort Baker area except for the pier and the Chapel Trail. Visitor use at Fort Baker is considered moderate (table 1). Few commercial dog walkers currently use Fort Baker.

Monitoring by law enforcement staff is extensive at Fort Baker, yet park staff estimate that about half the visitors with dogs are in violation of regulations. From 2008 through 2011, a total of 60 dog-related incidents were reported. Of these, 52 incidents were for having dogs off leash (table 4). Dogs have been observed off leash by park staff on the parade ground, Drown Fire Road, the Battery Yates area, and behind the Bay Area Discovery Museum.

TABLE 4. NUMBER AND TYPE OF DOG-RELATED INCIDENTS AT FORT BAKER, 2008–2011

Incident Type	Year				Total
	2008	2009	2010	2011	
Off-leash Violation	12	21	9	10	52
Possessing Pet in Closed Area*	2	1	0	1	4
Hazardous Condition	0	0	1	0	1
Other	0	1	0	2	3
Total	14	23	10	13	60

* The closed areas resulting in violations at this site include Drown Fire Road, McReynolds Road, and Fort Baker Pier, which are closed to pets.

CRISSY FIELD

- **Pref'd Alt:** On-leash dog walking on pathways, central and western sections of the airfield; ROLA on eastern section of airfield and central beach; WPA closed to dogs
- **Key Resources:**
 - **Vegetation Communities** – Coastal Community, Wetlands and Aquatic Habitat
 - **Wildlife Communities** – Coastal Community, Wetlands and Aquatic Habitat
 - **Special-status Species**
 - Western snowy plovers
 - **Visitor Experience**– visitors walk dogs off-leash on all beaches and other areas except for seasonal restrictions
- **Impacts of No-Action Alternative:**
 - **Vegetation** – minor to moderate; restored dune areas are fenced but dogs have been observed frequently in dune habitat, digging and trampling vegetation; similarly dogs are frequently observed in the tidal marsh
 - **Wildlife** – minor to moderate; off-leash dogs would continue to disturb and harass shorebirds on the beaches and wildlife in the tidal marsh
 - **Special-status Species** – moderate, current seasonal leash restriction is often violated in the Wildlife Protection Area (WPA); dogs would continue to disturb and harass snowy plovers
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – moderate as visitors would still experience dogs in most areas of the site
- **Impacts of Preferred Alternative:**
 - **Vegetation** – negligible; physically restraining dogs will protect the dunes and tidal marsh
 - **Wildlife** – negligible to minor; off-leash dogs on the central beach, about 1/3 of beach habitat at the site, would still have potential to chase and harass shorebirds
 - **Special-status Species** – negligible, western snowy plover habitat and individuals would be protected by closing the WPA and restraining dogs on-leash in other areas with sensitive habitat
 - **Visitor Experience** –
 - People who prefer dogs – minor to moderate as areas open to off-leash dogs would be limited to designated areas
 - Visitors who prefer no dogs – beneficial as off-leash dog walking would be limited to designated areas

Crissy Field Dog Related Incident Reports

People visit Crissy Field as early as 4:00 a.m. and there is moderate to high visitor use throughout the day. Park staff estimates that throughout Crissy Field, there are generally 5 to 10 commercial dog walkers per day (fewer on weekends than weekdays), and typically 3 present with between 4 and 6 dogs each at any given time of the day. These dogs are often off leash, as are many of the dogs observed.

Park visitation at Crissy Field was analyzed as a result of surveys conducted in November 2008. During these surveys, activities were only summarized for the subset of visitors who access the site via the trail/promenade entrances (IEC 2011, 23). Results of the 2008 survey at Crissy Field indicate that nearly all visitors observed at the trail/promenade entrances were runners/walkers (72 percent), bikers (21 percent), or dog walkers (6 percent). Of the 484 interviews completed, 32 percent of people interviewed had dogs with them. The East Beach lot was the most popular for dog walkers (54 percent of the respondents had dogs), followed by visitors at West Bluff (32 percent had dogs), and the east end of the promenade (21 percent had dogs). Approximately half of the visitors indicated that their dog went into the water at the beach, with the majority of these visitors located at East Beach and the West Bluff.

Compliance with the current dog walking regulation is low at Crissy Field. A total of 510 incidents were reported from 2008 through 2011 (table 5). The most common incident at Crissy Field is for having off-leash pets within the WPA (283 reported incidents) during the period (July 1–May 15) when dogs must be leashed. Other common incidents include having a dog within a closed area and for having dogs off leash. A total of 17 hazardous conditions which include dog bites/attacks were reported from 2008 through 2011 (table 5). Park maintenance activities are also demanding at this site, including issues related to vandalism of signs as well as dog-related issues such as removal of dog waste and urination on trash cans.

TABLE 5. NUMBER AND TYPE OF DOG-RELATED INCIDENTS AT CRISSY FIELD, 2008–2011

Incident Type	Year				Total
	2008	2009	2010	2011	
Violation of Leash Restriction in WPA*	65	158	27	33	283
Violation of Closed Area**	58	0	0	0	58
Off-leash Violation	44	6	5	10	65
Possessing Pet in Closed Area**	13	2	0	0	15
Hazardous Condition	2	5	5	5	17
Pet Excrement	0	2	0	1	3
Wildlife Disturbance	0	1	0	1	2
Unattended Pet	0	0	0	1	1
Other	9	25	7	25	66
Total	191	199	44	76	510

* This violation is for disobeying the seasonal leash restriction (July 1 through May 15).

** The closed areas resulting in violations at this site include the lagoon (closed to humans and pets) and the WPA (seasonally closed to off-leash dog walking). U.S. Park Police and NPS rangers appear to cite these regulations interchangeably on incident reports, and therefore, these incidents were kept separate and not compiled in this table.

OCEAN BEACH

- **Pref'd Alt:** North of Stairwell 21 – ROLA; Stairwell 21 to Sloat Beach Snowy Plover Protection Area (SPPA) – Ocean Beach Trail on-leash; South of Sloat Beach – no dogs
- **Key Resources:**
 - **Vegetation Communities** – Coastal Community
 - **Wildlife Communities** – Coastal Community, SPPA Coastal Community
 - **Special-status Species** –
 - Western snowy plovers
 - **Visitor Experience**– visitors walk dogs off-leash on all beaches except for seasonal restrictions
- **Impacts of No-Action Alternative:**
 - **Vegetation** – minor; some trampling by dogs
 - **Wildlife** – moderate to major; off-leash dogs would continue to disturb and harass wildlife
 - **Special-status Species** – minor to moderate, current seasonal leash restriction is often violated in the SPPA; dogs would continue to disturb and harass wildlife
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – moderate as visitors would still experience dogs on the beach and the site is a moderate to high dog use area
- **Impacts of Preferred Alternative:**
 - **Vegetation** – negligible; dogs will be on-leash around the dunes
 - **Wildlife** – minor to moderate; shorebirds and mammals south of Sloat Boulevard would be protected, but the ROLA north of Stairwell 21 encompasses about ¼ the beach habitat for the site and dogs off-leash can still disturb shorebirds and marine mammals
 - **Special-status Species** – no impact in the SPPA; for the area north of Stairwell 21, negligible to minor impacts could still occur as off-leash dogs could chase and disturb snowy plovers in this area, although snowy plovers occur in lower numbers north of Stairwell 21
 - **Visitor Experience** –
 - People who prefer dogs – minor to moderate as areas open to off-leash dogs would be limited to a central and northern portion of the beach
 - Visitors who prefer no dogs – beneficial as a large part of the beach would be designated no dogs

Ocean Beach Dog Related Incident Reports

Ocean Beach is a moderate to high use area for beachgoers, walkers, runners, birdwatchers, picnickers, equestrians, and surfers. Ocean Beach is a low to moderate use area for dog walking. The SPPA is a moderately used area for dog walkers, beachgoers, and runners.

A visitor survey documenting visitor experience in 2008 was conducted in two phases. The first phase of the survey found that at Ocean Beach, 6.7 percent of respondents noted dog walking as their primary reason for their visit (Tierney et al. 2009, 52). The second phase of the survey, found that at Ocean Beach, 22 percent of respondents mentioned off-leash dogs as a moderate or serious problem associated with their park experience (Nakagawa, Rogers, and Adcock et al. n.d., 48).

During the November 2008 visitor surveys, 46 percent of visitors were placed in the catch-all “Other” category. Additional activities observed at Ocean Beach included running/walking (25 percent), surfing (11 percent), dog walking (9 percent), picnicking (6 percent), and biking (3 percent) (IEC 2011, 11). The proportion of dog walkers at Ocean Beach on the weekend (11 percent) is slightly higher than the weekdays (9 percent) (IEC 2011, 13).

Compliance with the current dog walking regulation at Ocean Beach is low. From 2008 through 2011, a total of 969 dog-related incidents were reported. The majority of the incidents reported were for having an off-leash dog within the SPPA (729 incidents) during the period (July 1 through May 15) when dogs must be leashed (table 6). Other common incidents were for having a dog in a closed area (as described in table 6) and for walking dogs off leash. A total of 22 incidents were for hazardous conditions, which included 21 dog bites/attacks and 1 animal cruelty (table 6). Incidents at Ocean Beach also included dogs disturbing wildlife, including special-status species.

TABLE 6. NUMBER AND TYPE OF DOG-RELATED INCIDENTS AT OCEAN BEACH, 2008–2011

Incident Type	Year				Total
	2008	2009	2010	2011	
Violation of Leash Restriction in SPPA*	141	345	112	131	729
Off-leash Violation	62	11	11	5	89
Hazardous Condition	4	5	7	6	22
Wildlife Disturbance	2	1	1	1	5
Disturbance of Threatened and Endangered Species	3	0	0	1	4
Pet Excrement	0	2	1	2	5
Violation of Closed Area**	75	0	0	0	75
General Pet Violations	0	1	0	0	1
Possessing Pet in Closed Area**	2	0	0	0	2
Other	5	12	11	9	37
Total	294	377	143	155	969

* This violation is for disobeying the seasonal leash restriction (July 1 through May 15).

** The closed areas resulting in violations at this site include Ocean Beach dunes (closed to humans and pets) and the Ocean Beach SPPA (seasonally closed to off-leash dog walking). U.S. Park Police and NPS rangers appear to cite these regulations interchangeably on incident reports, and therefore, these incidents were kept separate and not compiled in this table.

FORT FUNSTON

- **Pref'd Alt:** ROLA on the beach south of Funston Beach Trail (North) and north of the main parking lot; on-leash dog walking south of the main parking lot on Funston Beach Trail (South) and (former Sunset) Coastal Trail and on trails outside of the ROLA north of the main parking lot; no dogs on Funston Horse Trail and north of Funston Beach Trail (North)
- **Key Resources**
 - **Vegetation Communities** – Coastal Community
 - **Wildlife Communities** – Coastal Community
 - **Special-status Species** –
 - Bank swallow
 - San Francisco lessingia
 - **Visitor Experience**– visitors walk dogs off-leash on the beach between the north and south segments of Funston Beach Trail and north of the main parking lot; visitors walk dogs on-leash in the parking lot and surrounding trails
- **Impacts of No-Action Alternative:**
 - **Vegetation** – major; site is denuded by trampling and nutrient addition by dogs
 - **Wildlife** –moderate to major; off-leash dogs frequently disturb/harass shorebirds and marine mammals
 - **Special-status Species** –minor to moderate; dogs occasionally access bluff habitat but are unlikely to disturb nesting bank swallows; dogs create physical disturbance that affects San Francisco lessingia, even in fenced restoration areas
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – moderate to major; visitors would experience off-leash dogs throughout the site and on the beach
- **Impacts of Preferred Alternative:**
 - **Vegetation** – minor; restricting dogs would reduce trampling; dogs would still trample dune vegetation at the upland ROLA
 - **Wildlife** – moderate; wildlife north of the Funston Beach Trail (North) would be protected from dogs; however, off-leash dogs using the two ROLAs could still disturb shorebirds, marine mammals and other wildlife
 - **Special-status Species** – no impact to minor impacts; dogs would be prohibited from bluff habitat; physically restraining dogs would keep them out of sensitive habitats, except for the dune habitat at the upland ROLA
 - **Visitor Experience** –
 - People who prefer dogs – minor; though areas open to off-leash dogs would be reduced especially south of main parking lots where others uses are impacted.
 - Visitors who prefer no dogs – moderate; two ROLAs would be established and dogs would be allowed on leash on most trails; the site experiences high dog walking use

Fort Funston Dog Related Incident Reports

On-leash dog walking or dog walking under voice control is allowed throughout Fort Funston and on the Fort Funston beach, except for three areas: the 12-acre habitat protection area to protect native plant communities, a voluntary seasonal closure to protect bank swallow habitat, and the north end of the Sunset Trail due to erosion.

Fort Funston is heavily used by multiple user groups including walkers, hang gliders, fishermen, equestrians, birdwatchers, environmental center participants, as well as dog walkers, including commercial dog walkers (table 1). For birdwatchers, Fort Funston offers recreation in the form of birdwatching at both the beach areas along the ocean as well as the dune areas (Murphy 1996, 1). The hang glider platform at Fort Funston provides an excellent view of the ocean, where flocks of feeding birds may be viewed from above (Murphy 1996, 1). Viewing the bank swallows along the cliffs and birdwatching along the Sunset Trail are also favorite areas for bird enthusiasts, including views at both Battery Davis and Skyline Grove (Murphy 1996, 3-4). During the August 2011 visitor surveys, the majority (62 percent) of visitors were dog walkers. Other popular activities included running/walking (25 percent), and hang gliding (1 percent) (IEC 2011, 10). The 11 percent of visitors classified as "Other" at Fort Funston were primarily sight-seers who visited the overlook area. Dog walking at Fort Funston was more popular on weekdays (66 percent of visitors) than on weekends (57 percent of visitors) (IEC 2011, 13). During the visitor survey, hanggliders may have been undercounted because many hang gliders gathered at the site past dark to socialize, and therefore were not accounted for because the survey ended prior to these visitors leaving the site. Visitation estimates also excluded visitors entering the site at the John Muir Drive entrance, since this park entrance was not surveyed, except when visitors and dogs were counted at this entrance for 2 hours on Sunday, August 21, 2011 (IEC 2011, 23).

During the *GGNRA Dog Walking Satisfaction Visitor Study* (NPS 2012a), when dog walkers were asked which site at GGNRA they visit the most, 40 percent indicated Fort Funston, making it the most frequently visited GGNRA site at the park by dog walkers (NPS 2012a, Appendix A: 6). Fort Funston was also indicated as the fourth most frequently visited GGNRA site by non-dog walkers during the survey (6 percent) (NPS 2012a, Appendix A: 69).

Park staff has observed commercial dog walkers regularly walking 10 to 12 dogs per visit and generally allowing them to be off leash; park staff has also observed private dog walkers allowing their dogs off leash. During the August 2011 visitor survey, many visitors were observed with large groups of dogs. While some of the visitors may be individuals who own multiple dogs, most were likely professional dog walkers. On weekdays, 50 percent of the dogs observed at Fort Funston were in groups of five or more dogs, with approximately 15 percent in groups of ten or more dogs. In contrast, on the weekends, only 7 percent of the dogs observed were in groups of five or more dogs, and fewer than 2 percent were in groups of ten or more dogs (IEC 2011, 14). These results suggest that many dog owners hire professional dog walkers during the work week when there is a high presence of professional dog walkers at Fort Funston. The high concentration of dog walkers may discourage other users, although some users state that they come to Fort Funston to interact with dogs. Due to the high volume of dogs that visit this site, urination and the associated smell is obvious in areas adjacent to the parking lots (and reported by SFUSD near their environmental ed center).

A total of 172 dog-related incidents were recorded from 2008 through 2011. The majority of incidents recorded were for having a dog off leash and for hazardous conditions. Of the 72 hazardous conditions reported, 41 were for dog bites/attacks, 2 were for verbal assaults, and 29 were for pet rescues at the cliffs of Fort Funston (table 7).

TABLE 7. NUMBER AND TYPE OF DOG-RELATED INCIDENTS AT FORT FUNSTON, 2008–2011

Incident Type	Year				Total
	2008	2009	2010	2011	
Hazardous Condition	18	20	16	18	72
Off-leash Violation	6	4	54	5	69
General Pet Violations	4	0	1	0	2
Vegetation Damage	4	0	0	0	1
Possessing Pet in Closed Area*	0	1	0	0	1
Other	2	12	2	11	27
Total	28	37	73	34	172

* The closed area includes Fort Funston cliffs, which has a voluntary seasonal closure between April 1 and August 15.

MORI POINT

- **Pref'd Alt:** On-leash dog walking allowed on specified trails; no ROLA
- **Key Resources**
 - **Vegetation Communities** – Coastal Scrub, Chaparral, and Grasslands; Wetlands and Aquatic Habitat
 - **Wildlife Communities** – Coastal Community, Coastal Scrub, Chaparral, and Grasslands; Freshwater Wetlands and Estuarine Wetlands
 - **Special-status Species** –
 - California red-legged frog
 - San Francisco garter snake
 - Hickman's Potentilla
 - **Visitor Experience**– visitors walk dogs on-leash on all trails
- **Impacts of No-Action Alternative:**
 - **Vegetation** – negligible to minor with some trampling by dogs
 - **Wildlife** – negligible to moderate; off-leash dogs have been observed in areas with potentially sensitive habitat; on-leash dogs can chase shorebirds; dogs observed in fenced ponds
 - **Special-status Species** – negligible to minor, dogs have been observed in ponds and can disturb sensitive habitat
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – minor as visitors would still experience dogs on all trails throughout the site and on the beach
- **Impacts of Preferred Alternative:**
 - **Vegetation** – negligible since dogs will be on-leash and some trails have been closed to dogs
 - **Wildlife** – negligible to minor, dogs on-leash will reduce physical impacts but dogs can still disturb wildlife behavior, as noted above for no action
 - **Special-status Species** – negligible to minor, dogs would be prohibited in ponds but would still be adjacent to ponds; physically restraining dogs would keep them out of sensitive habitats
 - **Visitor Experience** –
 - People who prefer dogs – minor as areas open to dogs would be reduced
 - Visitors who prefer no dogs – beneficial as only three trails would be open to dogs, more areas without dogs available to visitors

Mori Point Dog Related Incident Reports

On-leash dog walking is permitted in designated areas as indicated by signage. The site has moderate to high use by visitors and is used primarily by locals for walking, running, and biking. It is also a moderate use area for dog walking (table 1). During the *GGNRA Dog Walking Satisfaction Visitor Study* (NPS 2012a), when dog walkers were asked which site at GGNRA they visit the most, 4.2 percent indicated Mori Point, making it the fifth most frequently visited GGNRA site by dog walkers at the park (NPS 2012a, Appendix A: 6). GGNRA has conducted or sponsored several visitor surveys to determine what activities people participate in on park lands and how satisfied they are with their experience. A small survey (31 respondents) was conducted in 1980 at Mori Point and Sweeney Ridge, which determined that dog walking was the second most popular reason for visiting the area; 21 percent of respondents walk their dogs in the area. Additionally, 35 percent of respondents ranked dog walking as a “very important” or “extremely important” activity at the site (NPS 1980).

Compliance with the current dog walking regulation at Mori Point is low. From 2008 through 2011, a total of 153 dog-related incidents were reported. Of these incidents, 146 were for having a dog off leash (table 8).

TABLE 8. NUMBER AND TYPE OF DOG-RELATED INCIDENTS AT MORI POINT, 2008–2011

Incident Type	Year				Total
	2008	2009	2010	2011	
Off-leash Violation	23	52	41	30	146
Hazardous Condition	0	1	1	1	3
Pet Excrement	0	1	0	0	1
Violation of Closed Area*	1	0	0	0	1
Other	0	0	0	2	2
Total	24	54	42	33	153

* The closed area resulting in violations at this site includes Mori Point Road, which requires dogs to be leashed.

SWEENEY RIDGE / CATTLE HILL

- **Pref'd Alt:** On-leash dog walking allowed on specified trails; no ROLA
- **Key Resources:**
 - **Vegetation Communities** – Coastal Scrub, Chaparral, and Grasslands
 - **Wildlife Communities** – Coastal Scrub, Chaparral, and Grasslands
 - **Special-status Species** –
 - Mission blue butterfly
 - California red-legged frog
 - San Francisco garter snake
 - **Visitor Experience**–visitors walk dogs on-leash
- **Impacts of No-Action Alternative:**
 - **Vegetation** – minor; some trampling by dogs
 - **Wildlife** – minor to moderate; off-leash dogs have been observed in areas with potentially sensitive habitat
 - **Special-status Species** – negligible to minor, since dogs can disturb sensitive habitat and affect species directly through digging or capture
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – minor to moderate as visitors would still experience dogs throughout the site
- **Impacts of Preferred Alternative:**
 - **Vegetation** – negligible since dogs will be on-leash
 - **Wildlife** – minor; dogs on-leash will reduce physical impacts but dogs can still disturb wildlife behavior
 - **Special-status Species** – negligible for all, as dogs are on-leash
 - **Visitor Experience** –
 - People who prefer dogs – minor as areas opened to dog walking would be reduced
 - Visitors who prefer no dogs – beneficial as most trails would be closed to dogs & only limited on-leash trail use would be allowed

Sweeney Ridge/Cattle Hill Dog Related Incident Reports

On-leash dog walking is allowed on all trails at Sweeney Ridge except the Notch Trail, which is closed to dog walking to protect mission blue butterfly habitat. Sweeney Ridge has low visitor use, consisting mostly of bikers and hikers, and low to moderate use by dog walkers (table 1). Cattle Hill is not currently part of GGNRA. However, Cattle Hill is within the boundary and it is anticipated that the land will transfer to NPS management in the near future. Unrestricted dog walking currently occurs at Cattle Hill, although GGNRA does not have numerical information for this site. GGNRA has conducted or sponsored several visitor surveys to determine what activities people participate in on park lands and how satisfied they are with their experience. A small survey (31 respondents) was conducted in 1980 at Mori Point and Sweeney Ridge, which determined that dog walking was the second most popular reason for visiting the area; 21 percent of respondents walk their dogs in the area. Additionally, 35 percent of respondents ranked dog walking as a “very important” or “extremely important” activity at the site (NPS 1980).

Currently, compliance with the dog regulations at Sweeney Ridge is low. From 2008 through 2011, a total of 115 dog-related incidents were reported, with 113 of the incidents for having an off-leash dog (table 9).

TABLE 9. NUMBER AND TYPE OF DOG-RELATED INCIDENTS AT SWEENEY RIDGE/CATTLE HILL, 2008–2011

Incident Type	Year				Total
	2008	2009	2010	2011	
Off-leash Violation	18	27	32	36	113
Hazardous Condition	0	0	0	1	1
Possessing Pet in Closed Area	0	0	0	1	1
Total	18	27	32	38	115

RANCHO CORRAL DEL TIERRA

- **Pref'd Alt:** On-leash dog walking allowed in two specific areas Montara and El Granda; no ROLA
- **Key Resources:**
 - **Vegetation Communities** – Coastal Scrub, Chaparral, and Grasslands, Riparian Forests and Streams
 - **Wildlife Communities** – Coastal Scrub, Chaparral, and Grasslands, Riparian Forests and Streams
 - **Special-status Species** –
 - San Bruno elfin butterfly
 - Mission blue butterfly
 - Steelhead trout
 - California red-legged frog
 - San Francisco garter snake
 - Hickman's potentilla
 - **Visitor Experience** –visitors walk dogs off-leash, although this contradicts existing policies
- **Impacts of No-Action Alternative:**
 - **Vegetation** – minor with some dogs observed off-leash
 - **Wildlife** – minor to moderate; off-leash dogs have been observed in areas with potentially sensitive habitat
 - **Special-status Species** – negligible to minor, except for Hickman's potentilla for which the impact would be moderate due to off-leash dogs digging & trampling
 - **Visitor Experience** –
 - People who prefer dogs – no impact
 - Visitors who prefer no dogs – minor as visitors would still experience dogs throughout the site
- **Impacts of Preferred Alternative:**
 - **Vegetation** – negligible since dogs will be on-leash
 - **Wildlife** – negligible to minor, dogs on-leash will reduce physical impacts but dogs can still disturb wildlife behavior
 - **Special-status Species** – negligible for all as dogs are on-leash
 - **Visitor Experience** –
 - People who prefer dogs – minor to moderate adverse as no off-leash dog walking would be allowed
 - Visitors who prefer no dogs – beneficial as dogs are on-leash where allowed.

Rancho Corral de Tierra

Land within Rancho Corral de Tierra was transferred to the NPS in December of 2011, and has been under the NPS servicewide regulation for dog walking (36 CFR 2.15) since that time. An informal trail use study was conducted in 2010 at Rancho Corral de Tierra in the Montara area, an approximately 127 acre area that is a primary area for visitors (particularly off-leash dog walkers according to information from the Montara Dog Group), to identify current trail users and determine activity on specific trail segments (Bennett 2011). This survey was not peer reviewed, and is not relied upon by NPS for impacts analysis or decision-making, however, this survey is the best available information NPS has showing conditions at Rancho Corral de Tierra before NPS acquired the site. A total of 418 park visitors were observed, 250 of which were characterized as dog walkers (331 dogs were observed), which accounts for 58 percent of total visitor use at that portion of the Rancho site. This is not an unexpected percentage given this area's identification by the Montara Dog Group as one of two primary areas at Rancho Corral de Tierra used for off-leash dog walking. During this survey, visitors that were observed walking dogs as well as performing other activities were recorded only as walking dogs; all individuals within a group where a dog was present were recorded only as dog walkers. In the overall user categories, dog walking accounted for 58 percent of the total visitor use at the site, with 86 percent of dog walkers observed walking their dog(s) off leash (Bennett 2011).

No official data have been gathered on visitor use or law enforcement statistics for Rancho Corral de Tierra since NPS acquired the land. The information described here is based upon staff observations and anecdotal information from adjacent neighbors and park visitors. The number of visitors to Rancho Corral de Tierra has not increased substantially since the property transferred to the NPS; however, some residents and park staff have noticed that commercial dog walkers have begun to use the site. Visitor use is considered low to moderate with use primarily by local residents. Moderate use is more likely in the Montara and El Granada sections, which are in lower elevations closer to neighborhoods. Dog walking is considered a primary use at this site based on staff experience and public comment. Compliance with the NPS on-leash dog walking regulation (36 CFR 2.15) is low, with park staff reporting that some visitors refuse to leash their dogs.

**Notes for Superintendent Chris Lehnertz for Congressional Office Visits
May 14, 2015**

Minority Leader Nancy Pelosi (Dem, San Francisco)

WASO Staff Director: Robert Edmondson

District Director: Dan Bernal

223 Cannon HOB

202- 225-4965

Issues: Dog Management; Alcatraz Embarkation; Presidio

Representative Jared Huffman (D-Marin County)

WASO Staff Director: Ben Miller

District Director: Jenny Callaway

1630 Longworth HOB

202-225-5161

Issues: Dog Management; Muir Woods Traffic/Congestion

Representative Jackie Speier (D-San Mateo County)

WASO Staff Director: Cookab Hashimi

District Director: Brian Perkins

2465 Rayburn HOB

202 225-3531

Issue: Dog Management

Senator Barbara Boxer (D-CA)

WASO Staff Director: Laura Schiller

District Director: Joshua Quigley (our issues)

112 Hart SOB

202-224-3553

Issues: Dog Management; Presidio; Alcatraz Embarkation

Senator Dianne Feinstein (D-CA)

WASO Staff Director: Jennifer Duck

District Staff Director: Sean Elsbernd

331 Hart SOB

202-224-3841

Issues: Dog Management, Alcatraz Embarkation; Presidio

Dog Management

Background

- As dog ownership has increased sharply in communities surrounding the park since the late 1970's, so has political advocacy for off leash access to parklands.
- Many dog owners are well-educated and affluent, and are politically connected and savvy. Many have grown to view off leash dog walking as a right, and have lately hired attorneys and engaged in effective public affairs campaigns to convince elected officials that any attempt to limit off leash dog walking is an assault on their rights.
- The effectiveness of the off leash dog advocates has made them a political force to be reckoned with, and many politicians have taken up the cause of off leash use for fear of political retribution, as well as their own personal viewpoints on the topic.
- On the other hand, most politicians recognize that NPS has to address the desires and concerns of the spectrum of public viewpoints, as well as adhere to our mandate to protect park resources.
- While most of the local elected officials have been relatively restrained in their public comment, most have expressed a desire for the park to minimize the reduction in areas available for off-leash use.
- Rep Speier and SF Supervisor Scott Wiener have taken up the cause off leash dog walking, and are spokespersons for the off leash advocacy groups.
- Park received letter from the Boards of Supervisors of all three counties – at instigation of an off leash advocacy group called “Save Our Recreation” - asking the park to loosen restrictions on off leash dog use.
- We know anecdotally that many people have not become engaged in this issue because they expect the NPS to do the right thing and represent their interests – including limiting off leash use in order to permit dog-free experiences in the park.
- Environmental groups – NPCA, Audubon Society, Calif Native Plant Society, and Wild Equity Institute in particular - have been steadfastly opposed to widespread off-leash use of the park for reasons of resource protection.
- Some disabled rights and children's and elder advocates favor tight restrictions on off-leash use, due to fear of dogs, and concerns that dogs can cause falls or disrupt guide dogs. These stakeholders seem largely willing to trust that the NPS will make the right decision.

Current Status

- Since release of SEIS in Sept 2013, park has received more letters and email and social media postings supporting restrictions on off-leash dogs.
- When specifics of the dog plan are explained, the balance achieved by the plan appears to be understood by an increasing number of people, though the most vocal dog advocates are intractable.
- While dog advocates can easily attract media coverage of their positions, it appears that dog advocates may have overplayed their hands.
- Comments following news articles on the dog issue are at least even, if not leaning toward support of the NPS position. Many people are criticize dog advocates as acting 'entitled,' and ignoring the needs of other user groups.

- We can expect a very strong reaction as the draft rule is released.
- Strong information campaign about rule will be necessary to weather the storm. Emphasis will need to be on the **balance of interests** reflected by the plan/rule, **amount of dog opportunities**, and **need to manage for the future** and on behalf of the entire country.
- Success in changing behavior will be education, enforcement, monitoring, and patience in changing the behavior of four decades.

Where Elected Officials Stand

Leader Pelosi's position

- Expressed her desire that the park be responsive to community comments, especially the off-leash advocates, and recognize the needs of the surrounding urban area.
- Comment on the SEIS was extended at the direct request of Rep Pelosi
- Appears not to be generally supportive of NPS, related to recent decisions on the Presidio, as well as issues around the NPS Alcatraz ferry operation.
- Dogs are not her highest priority issue, but she is probably waiting to test the winds when the draft rule is released.
- May be open to arguments that NPS plan accommodates multiple stakeholders and vulnerable populations.

Representative Speier's position

- Taser incident in Dec 2011 became a cause celebre for Rep Speier. Held community hearing to excoriate park enforcement of leash rules at Rancho.
- Very vocal in opposing the NPS preferred alternative, particularly for RCDT.
- Has done radio spots for "Save our Recreation" and SF Dog/Montara Dog
- Has stated that she expects a ROLA at RCDT in San Mateo County; has implied legislative action if the plan fails to deliver to her specifications.
- Advocates a "Recreation Advisory Group" proposed by Martha Walters, SF Dog, Montara Dog, and Save Our Recreation to work with park on dog issues and other recreation uses.
- Has worked with park on volunteer programs at RCDT.
- Met with park reps and expressed support of a potential Portola National Historic Trail that includes Sanchez Adobe in Pacifica

Representative Jared Huffman's position

- Measured responses to date.
- Expressed hope to see more dog access, especially loop trails in Marin, and is hoping for some off-leash at Muir Beach.

Senator Feinstein's position

- Has asked NPS to consider the needs of recreation users, including dog access.
- Contacts us regularly to forward constituents concerns.
- Difficult to predict position when rule is released. DBOC may influence her position.

Senator Boxer's position

- Sent obligatory letter asking us to consider comments.
- Not active on this issue, but susceptible to lobbying by dog groups.
- May be open to arguments that NPS plan accommodates multiple stakeholders and vulnerable populations.

Alcatraz Embarkation

Background

Exemption 5 Deliberative - Non-Responsive

Current Status

Exemption 5 Deliberative - Non-Responsive

Where elected officials stand

Leader Pelosi's position

Exemption 5 Deliberative - Non-Responsive

Senator Feinstein's position

Exemption 5 Deliberative - Non-Responsive

Presidio

Background

Exemption 5 Deliberative - Non-Responsive

Current Status

Exemption 5 Deliberative - Non-Responsive

Where Elected Officials Stand

Leader Pelosi's position:

Exemption 5 Deliberative - Non-Responsive

Senator Feinstein's position:

Exemption 5 Deliberative - Non-Responsive

Senator Boxer's position:

Exemption 5 Deliberative - Non-Responsive

Muir Woods Traffic/Congestion

Background

Exemption 5 Deliberative - Non-Responsive

Current Status

Exemption 5 Deliberative - Non-Responsive

Exemption 5 Deliberative - Non-Responsive

Where Elected Officials Stand

Representative Huffman's position:

Exemption 5 Deliberative - Non-Responsive

Senator Boxer's position:

Exemption 5 Deliberative - Non-Responsive

Senator Feinstein's position

Exemption 5 Deliberative - Non-Responsive

November 4, 2011

Bill Bechtell
President, Montara Dog Group
P.O. Box 370493
Montara, CA 94037

Frank Dean, GGNRA Superintendent
Building 201, Fort Mason
San Francisco, CA 94123-0022

Dear Mr. Dean,

Thank you for the opportunity to comment on this important document, the Golden Gate National Recreation Area's (GGNRA) draft General Management Plan/EIS (GMP).

My name is Bill Bechtell and I am president of the Montara Dog Group. I have previously commented on the draft Dog Management Plan/EIS (DMP). My main area of concern is Rancho Corral de Tierra (Rancho), soon to be acquired by the GGNRA. Rancho was not directly recognized in the draft DMP, but it is recognized in this draft GMP, so I feel compelled to address dog issues here, as well as other issues, even though they may be duplicative of some of my comments on the draft DMP. In the draft DMP, the GGNRA's preferred alternative for "New Lands" such as Rancho, was "No dog walking allowed."

The preparation of these two plans separately, even though they are intimately related, is very confusing to the public. It is unfortunate that the public will not have an opportunity to review and comment on an integrated plan.

The Montara Dog Group consists of approximately 300 people, mostly residents of the San Mateo County midcoastside, who regularly walk their dogs in the Rancho open space. The midcoastside area extends from Pacifica on the north to Half Moon Bay on the south, and includes the small unincorporated communities of Montara, Moss Beach and El Granada, all of which share boundaries with Rancho (see Enclosure 1). The area has long had the reputation of being a dog-friendly area, largely because of the numerous trails available in Rancho for dog walking. I, myself, have lived in Montara for 35 years, and regularly walk my dog on the numerous Rancho trails. The midcoastside is also a tight-knit community willing to fight diligently to preserve the cultural and environmental values that attracted us to this area in the first place. For many years the open space, now known as Rancho, was privately held by various development

corporations. They tried to build condos and golf courses, and to subdivide the property into “ranchettes.” We fought back all of these attempts. Then Caltrans dusted off some 1960s-era freeway plans, and tried to put a freeway (the Devil’s Slide Bypass) through the heart of Rancho. We mobilized to fight this freeway, and eventually convinced Caltrans that a tunnel behind Devil’s Slide was a much better solution, again sparing Rancho. Then in 2001, the Peninsula Open Space Trust (POST) purchased Rancho to save it from development. We dog walkers have had a very good working relationship with POST over the years. They have no staff rangers, so we have been POST’s eyes and ears on Rancho, reporting off-road vehicle activity and illegal dumping. We have also installed and maintained dog waste disposal cans throughout the dog walking area at our own expense, and all done by volunteers from our group. These cans are used by hikers and picnickers as well as dog walkers. Many of us also volunteer for trail maintenance projects on the adjacent McNee Ranch State Park, including the design and construction of a 75-ft bridge across Martini Creek, linking Rancho to the state park.

Vol. I, p. 15; PARK PURPOSE: “The purpose of the Golden Gate National Recreation Area is to offer national park experiences to a large and diverse urban population while preserving and interpreting the park’s outstanding natural, historic, scenic, and recreational values.” I find this statement of purpose particularly troubling. I am not sure what is meant by “national park experiences,” but I do understand “recreational values” which are attached to the end of the statement almost as an afterthought. Please refer to Vol. III, p. 96 of this plan which presents the congressional act establishing the GGNRA. It states; **“In order to preserve for the public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintainence of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the “recreation area”) is hereby established.”** (Italics mine.) It is clear that congress did not intend to establish a national park, but a recreation area, and they even refer to it as a recreation area, not a national park. When GGNRA tried to change it’s status from “National Recreation Area” to “National Park” in 2008, there was a large public outcry from a coalition of the park’s recreational users against that proposed bill, and congress, in it’s wisdom, dropped discussion and decision on the bill. Now it appears that the GGNRA is again trying to convert itself into a national park by coming in through the back door with this GMP! If I want “national park experiences” I will go to Yosemite or the Grand Canyon. If I want nearby recreational open space where I can walk my dog, I want to be able to go to the Golden Gate National Recreation Area.

Vol. I, p. 218; Rancho Corral de Tierra, Natural Zone: I have no problem with classifying most of Rancho as a Natural Zone, because that is what it is. And I agree that it should be open to “trail-based recreation that is light on the land.” Trail-based recreation, however, should include dog walking, both on-leash and off-leash. There are two existing historical off-leash dog walking areas in Rancho, one north of Montara (see Enclosure 2) and one northeast of El Granada (see Enclosure 3). Although a dog walker, I also consider myself an environmentalist. I have been a Sierra Club member for almost 50 years (former trip leader), and a member of Sequoia Audubon Society (former board member) for about 30 years. With proper education, signage and enforcement there is no reason for dog walking to cause environmental damage. Mr. Ken White, president of the Peninsula Humane Society & SPCA, considered the effect of off-leash dogs on Rancho near Montara, and came to these conclusions:

“Our professional wildlife rehabilitation staff completed a review/analysis of the site and the proposal, and we believe that there is no observable reason related to the protection of native wildlife which would justify denying access to off-leash dogs in the area.”

“Please reconsider your plan to ban dogs and off-leash dog play from the small areas of Rancho Corral de Tierra which informally allowed this use for years with no negative impact.”

The full letter is attached at the end of this report (Enclosure 4). Montara Dog Group certainly realizes and accepts the need to ban dogs (and people) from certain sensitive habitat areas and will cooperate fully to help protect those areas when they are identified by scientific studies. We are advocates for responsible off-leash dog walking, and have published a protocol describing when it is not appropriate to have your dog off-leash (Enclosure 5). Both Marin County and San Francisco County have off-leash dog walking areas within the GGNRA. None are proposed for San Mateo County in the draft DMP. San Mateo County should also have recognized off-leash dog walking areas.

I hope that the final GMP and final DMP address my above concerns.

Yours truly,

Bill Bechtell
President, Montara Dog Group
www.montaradogs.com
650-728-3946

Cc:

U.S. Senator Diane Feinstein
U.S. Senator Barbara Boxer
Congresswoman Jackie Speier
U.S. Representative Nancy Pelosi
Congresswoman Anna Eshoo
U.S. Environmental Protection Agency, Region IX

Enclosures:

1. Existing Off-Leash Dog Walking Areas within Rancho Corral de Tierra
2. Existing Off-Leash Dog Walking Area within Rancho Corral de Tierra (Montara)
3. Existing Off-Leash Dog Walking Area within Rancho Corral de Tierra (El Granada)
4. Letter from Ken White, President Peninsula Humane Society & SPCA to Frank Dean, General Superintendent, GGNRA, dated February 8, 2011
5. Montara Dog Group Leash Protocol

Board of Supervisors



COUNTY OF SAN MATEO

COUNTY GOVERNMENT CENTER • REDWOOD CITY • CALIFORNIA 94063-1662
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(650) 363-4653
FAX: (650) 599-1027

August 28, 2014

Superintendent Frank Dean
Golden Gate National Parks
Building 201, Fort Mason
San Francisco, CA 94123-0022

Re: GGNRA's Proposed Dog Management Policy

Dear Superintendent Dean:

On behalf of the San Mateo County Board of Supervisors, we write to urge the Golden Gate National Recreation Area (GGNRA) to reconsider its current preferred alternative dog management policy (Alternative F in the 2013 DSEIS/DMP) and adopt a more inclusive policy.

Visitors to the GGNRA have for years been able to take their dogs through the vast and beautiful GGNRA lands. The significant reduction of dog access proposed by the GGNRA severely diminishes recreational opportunities for dog owners. In particular, we do not believe new restrictions should be placed on dog access in the Rancho Corral de Tierra lands and in the Fort Funston area where dog walking has been popular for decades. Our Board is also concerned about the impact the GGNRA's proposal will have on the elderly and young families who have—until now—enjoyed a more inclusive dog management policy.

From the beginning of the GGNRA's Dog Management Plan/Draft Environmental Impact Statement process, one concern has been voiced loud and clear: There must be adequate recreational opportunities for visitors with dogs. The Boards of Supervisors for San Mateo, Marin and San Francisco Counties have each voted in support of this important community need.

While we recognize the need for sensible management of the GGNRA's precious natural resources, we also very much want the ability for dog owners to enjoy our parks. San Mateo County believes that a reasonable compromise can be reached with dog owners and we encourage the GGNRA to rethink its overly restrictive policy on dog access.

Thank you for your consideration.

Sincerely,

Dave Pine, President
Board of Supervisors

Don Horsley, Supervisor
District 3

cc: The Honorable Jackie Speier, U.S. House of Representatives
The Honorable Kate Sears, Marin County Board of Supervisors
The Honorable David Chiu, San Francisco County Board of Supervisors
Christine Lehnertz, National Park Service
Ken White, Peninsula Humane Society & SPCA

Talking Points for Director Jarvis's phone call with Rep Jackie Speier

Background:

- Rep Jackie Speier (D- CA 14th) represents the southwestern portion of San Francisco and all the San Mateo County portions of GOGA.
- Since 2011, she has been at odds with NPS on the issue of off-leash dog use in Rancho Corral de Tierra. The park acquired this 3500-acre parcel in Dec 2010.
- In January 2011, an NPS ranger used a taser to control an uncooperative off-leash dog walker in an incident that became a *cause celebre* for off-leash dog stakeholders throughout the park. The ranger was exonerated in an Office of Professional Responsibility review.
- San Mateo County and the US Atty both declined to pursue the criminal case against the off-leash dog walker. A civil suit by the dog walker is scheduled for trial starting August 11, 2014.
- Rep Speier was critical of the park in news stories over the taser incident, and called for a review/overhaul of NPS policies on electronic control devices. She also stated at that time that NPS needed to accommodate off-leash dog use in future planning for the site.
- In January 2014, near the end of the public comment period for the Supplemental Dog Mgt Plan/EIS, Rep Speier convened a public meeting, at which Superintendent Frank Dean was a presenter; she again reiterated her demand that NPS provide for off-leash dog walking at Rancho Corral de Tierra.
- At that meeting, she also endorsed the idea of NPS creating a "Recreation Roundtable," a panel consisting of a variety of recreation user groups, to serve as advisors to the park when it considers regulating recreation uses.
- In June 2014, Rep Speier participated in a news conference convened by SF Supervisor Scott Wiener and including the presidents of the boards of supervisors in the three counties in which the park is located (San Francisco, San Mateo, and Marin). The purpose of this media event, which conflated the Dog Mgt Plan and the park's new GMP, was to release a letter to Superintendent Frank Dean demanding that he "save recreation" in the GGNRA.

Dog Mgt Plan Status:

- The park is preparing the draft Rule for dog walking, following review of over 7000 comments on the SEIS.
- The preferred alternative in the SEIS did not recommend an off-leash area at Rancho, due to the observed or likely presence of threatened/endangered species (red-legged frog; San Francisco garter snake).
- Instead, the plan recommended on-leash access on a number of the most popular trails in Rancho. This represents a large reduction in the areas currently available to on-leash dog walkers, since the entire property is now under the provisions of CFR 36, Sec 2.15 (dogs on leash).

San Mateo County Parks Position

- While Rep Speier is demanding that NPS accommodate off-leash dog use, San Mateo County Parks has strict rules in its 19 park units that prohibit dogs altogether.

- When the previous owner (Peninsula Open Space Trust – POST) was discussing transferring the land to NPS, the park asked San Mateo County if they would accept the northern end of Rancho for development as a county dog park. The County refused.
- The County recently obtained a property adjoining Rancho Corral de Tierra and is considering designating a small area for on-leash dog use. **Note: Rep Speier may not yet know this information.**

Recreation Roundtable proposal:

- The park does not support the idea of a multi-stakeholder panel to consider recreation uses for several reasons
 - The FACA Negotiated Rulemaking Committee (2006-2008) convened to try for a consensus on a rule for dog management was a noble exercise, but was very costly, and consensus was as far away at the end as at the beginning of the process.
 - The park has no problem gaining the attention of stakeholders for any recreation proposal.
 - We believe the real motivation behind this proposal is to create pressure for the park to back off on its due diligence in protecting park resources and managing for the needs of the full spectrum of desired visitor experience

TO BE INSERTED AFTER DESCRIPTION OF SELECTED ALTERNATIVES –or Where??:

CLARIFICATIONS TO FEIS LANGUAGE:

During the 30-day no- action period following release of the FEIS, the park received XXX [??] letters from the public . Two issues [three, if we add a clarification re GMP zoning and dogs] raised by the public would benefit from further clarification. The following constitutes clarification on these issues.

Relationship between the General Management Plan (GMP) and the Dog Management Plan

In the FEIS, the NPS explained that the GMP would not make decisions about dog walking and deferred site-specific decisions regarding dog walking to the Dog Management plan. (FEIS Volume 1, p. 34). The FEIS also states on the same page that the NPS could make “minor” adjustments to the GMP based on the outcome of the Dog Management Plan, which will not be completed for at least another year. In the ‘Comments on, Changes to, and Responses to Comments’ section of the FEIS, (Volume 2, p. 399), the FEIS states that in the event of inconsistencies between the GMP and the Dog Management Plan, the Dog Management would take precedence over the GMP for this specific use. The language in Volume 2, at p. 399, more clearly communicates the relationship between the two plans, and the NPS will apply this language in the event there are any inconsistencies between the two plans.

DO WE NEED TO CLARIFY THIS ?? Permissibility of dog walking in areas zoned Natural in the GMP

Another concern expressed during the no-action period related to whether dog walking is precluded in areas zoned Natural by the GMP, and if so, whether the GMP’s zoning designations prejudice the outcome of the Dog Management Plan.

As mentioned above, the final Dog Management Plan will determine which specific Natural zones, if any could accommodate on-leash dog walking.

Improvements east of Panoramic Highway in the vicinity of Homestead Hill

The FEIS states (Volume 1, p.124): “Improvements east of Panoramic Highway in the vicinity of Homestead Hill could enhance trail and transit access to Muir Woods and other nearby park destinations.”

The statement on page 124 is not intended to suggest construction of a new parking lot to serve Muir Woods visitors. **The NPS will not construct a parking lot on Panoramic Highway.** The improvements envisioned in the FEIS include better trail signage to help hikers reach Muir Woods and State Park lands, and improvements such as a bus stop for Marin Stagecoach

Exemption 5: Internal comment

passengers, to help visitors without cars to access the park along the State Route 1/Panoramic Highway scenic corridor management zone.

THE FOLLOWING PARAGRAPHS ADDRESS COMMENTS MADE BY SOME, INCLUDING REP HUFFMAN, BUT IT SEEMS ONLY THE PANORAMIC LOT REQUIRES CLARIFICATION.]

Regarding White Gate Ranch, a trailhead parking lot in that area would be intended to facilitate safe access to local trails, and would be sized based on several factors, including resource sensitivity, the level of use of the local trails, topography, and the rural character of that site.

The FEIS also states also states (Volume 1, p. 125): "NPS would work with California State Parks to encourage development of a small trailhead parking and picnic area near Santos Meadow and the Frank Valley horse camp, and improve access to this zone." (Volume 1, p. 125]

The concept for a small trailhead parking lot and picnic area at Santos Meadow, a property managed by California State Parks, is to cooperate in the improvement of existing facilities for visitors of the horse camp and local trails, and to improve access to the adjacent trails and the NPS property at the former Banducci flower farm, which could become a stewardship center, consistent with the rural character and limited infrastructure of the NPS property.

June 2014

To: San Francisco, Marin and San Mateo local, state and federal elected officials; National Park Service and GGNRA leaders

We, the undersigned, represent San Francisco Bay Area small businesses that provide dog-walking services to dog owners and dogs.

We are writing to urge you to stop the Golden Gate National Recreation Area from enacting a rule regarding professional dog walking permits that would go into effect almost immediately. We disagree with this rule for a variety of reasons, but we will focus here on the economic impacts for small businesses like ours:

* The GGNRA's proposal will negatively impact many of our businesses both in financial terms and in terms of the business models we've created that allow us to succeed.

*The proposal is harmful to our clients and customers. If we have to raise our prices and people cannot afford our services, more dogs will be cooped up in houses and apartments all day long with no exercise.

*The proposal will hurt city parks. Dog walkers who cannot afford to obtain the new GGNRA permit or afford the restrictions it mandates, will go to city parks, which are smaller.

*The proposal could lead to more dogs going to city and county animal shelters. If people who might want to adopt a dog cannot afford dog-walking services, they may be less likely to make an adoption.

Please stand up for the dog-loving community of the San Francisco Bay Area and the small businesses that support it. We urge you to act quickly to stop the GGNRA's proposed interim commercial dog-walking rule.

Thank you for your consideration,

Akiko Kariya
Doggie Boogie
San Francisco

Brendan O'Mahony
Happy Tails Dog Walkers
San Francisco

Shelley Leong
Bright Lights Dog Training
San Francisco

Courtney Durbin
The Whole Pet
San Francisco

Jessica Bay
Paw Trekkers
Marin

Cole Brodero
Happy Day Dog Walks
Marin

Cathy Chen-Rennie
The Rex Center
San Mateo

Danielle Starelli
The Heeling Star
San Mateo

Kytha Gernatt
sfdogpack.com
San Francisco

Richard Scheer
Outdoor Adventures
San Francisco

Luis Galindo
Happy Doggy Walky
Marin

Leigh Pyron
West Coast Dog Company
Marin

Robyn Doyle
Robin Doyle Services
San Francisco

Christina Ihm
Four Paws Walking
San Francisco

Justin Hanzel-Durbin
The Whole Pet
San Francisco

Kelly McCandless
Kelly's K-9 Adventures
Marin

Shannon Carlin
Shannon's Pet Care
San Mateo

Apollo Gerona
UGA & Company Dog Walker and Care
San Francisco

Alan Belgard
Fun Runs Dog Walking
San Francisco

Jessica Sicard
Tired, Happy Dogs
San Francisco

Scarlett Cermack
Embark Today
San Francisco

Susie Garcia
Teeny Dogs Inc
San Francisco

Victoria Rennick
Dogs United
San Francisco

Christine Bradley
Fetch It Dog Walking
San Francisco

Cassarra Groesbeck
Funston Fido
San Francisco

Lisa Luthultz
The Dog Pal
San Francisco

Leslie Dawson
SF Dog Squad
San Francisco

Suzanne Bohnel Buch
Dog Daze Pet Care
San Francisco

Erik Heise
Good Dog Play Care
San Francisco

Cynthia Evans
The Art of Dog
San Francisco

Katie Rogers
Katie's Critters
Marin

Sidney Tarlow
Sid Not So Vicious Bow Wow Brigade
Marin

Emma Clarke
Pawsitive Tails
San Francisco

Dylan Ravenelle
Diana Williams Dog Walking
San Francisco

D. Shelly Williams
Diana Williams Dog Walking
San Francisco

Michelle Sanchez
The Art of Dog
San Francisco

Caroline Cloak
A Girl and Your Dog
San Francisco

Matthew Condrow
Urban Canines
San Francisco

Rosi Oyama
Rosi Oyama Services
San Francisco

Jeanne Thomas
A Balanced Dog
Marin

Vicki Stephens
Vicki's Little Rascals Pet Care
San Mateo

Laura Curtin
Dog Days by the Bay
San Francisco

Sky Kral
Cloud 9 Canine
San Francisco

Ken Ogle
Active Pack
San Francisco

Al Werger

Kenji Yamada
Camp Kudo
San Francisco

Candice Fox
Fox Walks
San Francisco

Seth Green
Seth Green Canine Care
San Francisco

Jennifer Celesfre
Able Body Pet Care
San Mateo

Charlie Casaneda
A Girl and Your Dog
San Francisco

Tom Kilduff
Hounds Get Around
San Francisco

Steve Hooker
Hooker's Hounds
San Francisco

Maureen Holt
Mutt About Town
San Francisco

Ruth Jensen
Ruthwalksdogs.com
San Francisco

Stephen Yanjo
Dog Days by the Bay
San Francisco

Susan Blanchard
No Nonsense Dog Walkers
San Francisco

Kelly Sims
Ruff Day Adventures
San Francisco

Danielle Revives

Citipets
San Francisco

Nancy Stafford
Penguin Pet Pampering
San Francisco

Michelle Douglas
Bark for the Park
San Francisco

Eliot Temple
YeeePaw! Pet Care Solutions
San Mateo

Whitney Dewar
Marley & Me Animal Services
San Mateo

Susan Wu
Nu Pawspective
San Mateo

Liana Garza
Pet Care
San Mateo

Jim Slayton
Slay Dogs
San Mateo

Jean Cary
At the Other End of the Leash
San Mateo

Adele Booyesen
Adele's Pet Sitting
San Mateo

Bonnie Starr
Precious Pets
San Mateo

Dawn Hoover
A Pet's Best Friend
San Mateo

Play and Paws
San Mateo

Michelle Arakaki
Play and Paws
San Mateo

Jessey Walls
Fetch in the City
San Francisco

Adrina Phipps
Furry Palo Alto
San Mateo

Trudy Gardner
Half Moon Bay Dogs
San Mateo

Sarah Zemunski
Running with the Pack
San Francisco

Lauren Nichols
Ruffles Art Studio
San Francisco

Jean Sinclair
Woofgang's
San Mateo

Angela Gardner
All About Paws
San Francisco

Audrey Hart
Gigi & Garcon Pet Sitting
San Mateo

Cyndi Davis
Peninsula Critter Care
San Mateo

Francesca Lord
All Sorts of Pet Care
San Mateo

Glynis Dewing
Lucky Pawz Pet Services
San Mateo

Jane Creager
Leader of the Pack
San Mateo

Kathy Donath
Kathy's K9 and Kat Kare
San Mateo

Konrad Thaler
Smiling Dogs
San Mateo

Lucy Huntzinger
Creatures of Habit
San Mateo

Martha McCaffrey
Wiggling Tails Pet Sitting
San Mateo

Pamela Ryan
Dog Gone It
San Mateo

Teresa Steele
Primo Pet Care
San Mateo

Mary Malatesta
Mary's Pet Sitting
San Mateo

Michelle Crane
Wiggles Pet Sitting
San Mateo

Lisa Porter
Porter's Pet Sitting Services
San Mateo

Cynthia Lem
Inside/Out Pet Service
San Mateo

Jan Brown
Jan's Pet Sitting
San Mateo

Josephine Lisowski
Call Josephine
San Mateo

Kim Anderson
Good Mojo Pet Care
San Mateo

Lisa Warden
Twin Pines Pet Services
San Mateo

Lynda Mortensen
Bay Area Pet Pals
San Mateo

Nancy Gabriel
Nancy's Pet Care
San Mateo

Sue Fogel
Active Care Pet Services
San Mateo

Angela Colvin
Your Pack's Keeper
San Mateo

Mimi Powers
Belmont Pet Pal
San Mateo

Carla Menjivar
Bark! Meow! Chirp! Pet Sitting
San Mateo

Maria von Emster
Benji's Backyard
San Mateo

Dan Sullivan
Palo Alto Pet Care
San Mateo

Kim Petersen
Woofie Walkers
San Mateo

Ryland Elms
Ry the Pet Guy
San Mateo

Pam Fena
Pampurred Pets
San Francisco

Diana Luu
Busy Bodies Dog Walking
San Mateo

Molly Maloney
Pooches' Playtime
San Francisco

Jennifer Abejar
Pooches' Playtime
San Francisco

Cary Justin
The Whole Pet
San Francisco

Megan Brezovar
K9 Safari
San Francisco

Weston Lile
Walk Wag On
San Francisco & Marin

Jerel Lonnstrom
Diva Dogs
San Mateo

Heather Burton
A Hound About Town
San Francisco

Lynsie Campbell
Dogs Abide
San Francisco

Cathy Chen-Rennie
The Rex Center
San Mateo

Deborah Deegan
Dog Tales
San Francisco

Lisa Dossey
Pups at their Peak
San Francisco

Dusty Lombardo
Dogtown SF
San Francisco

Kim Moeller
Moeller Dog
San Francisco

Alan Rodriguez
Way of the Wolf
San Francisco

Jenny Test
Now Playing Pet Care
San Francisco

Paige Tuhey
Pant SF
San Francisco

Steve Baechtle
Black Paw Dog Service
San Francisco

Veronica Blanco
Frenchies & Co
San Francisco

Janet Bran
Janet Pet Care
San Francisco

Eric Burford
The Fairy Dogfather
San Francisco

Laura Curtin
Dog Days by the Bay
San Francisco

Julia Frink
Dogwalks.com
San Francisco

Katie Hall
Dog Shore
San Francisco

Rasan Lowell
Long Walks On The Beach
San Francisco

Cynthia Gaglianoo
Dog Love Solutions
San Francisco

Emy Sakai
Aliza Paz
The Urban Paw
San Francisco

Johnny Delaplane
Four Legged Fitness
San Francisco

Cari Ann Delaplane
Four Legged Fitness
San Francisco

Isabel Saques
SF Surf Dogs
San Francisco

Jeanne Eriksen
fitBERNALfit
San Francisco

Lane Gunsolley
The Panting Pooch
San Francisco

Chelsea Hernandez
Year of The Dog
San Francisco

David Levin
Citizen Hound
San Francisco

Jeff Chebul
Ranger's Squadron Dogwalking
San Francisco

Andrew Keller
Happy Scamper LLC
San Francisco

Mackenzie Dughi
Cindy Getschow
Erika Chan
Dorothy Onikute
Hannah Rose
Kristi Mill
A Girl and Your Dog
San Francisco

Briefing Points for Secretary Jewell

Presidio Trust

- The Presidio Trust was created in 1996 to manage most of the buildings and land at the 1500 acre Presidio of San Francisco, part of Golden Gate National Recreation Area.
- The Trust does not report to the NPS or DOI, but instead operates as an independent agency. As a federal corporation, it was given extraordinary authority to create its own personnel policies, seek financing from the Treasury, and to develop the Presidio to achieve financial self-sufficiency by 2013 – a goal which was met.
- The Trust is governed by a 7-member Board of Directors. Six of these are appointed by the President; one is appointed as representative of the Secretary of the Interior. Current Board Chair is Nancy Hellman Bechtel, a noted San Francisco civic volunteer, who is also a major fixture of San Francisco society.
- The Secretary's appointed board member is John Reynolds, a former Deputy Director of the National Park Service. Reynolds was appointed in 2009; his term has no expiration date. He has taken his role on the Trust Board very seriously, and seeks the input of the NPS on issues before the Board as appropriate. Nevertheless, he has maintained independence from NPS, as his Board role requires.
- Three of the current Board members' four-year terms expire in 2014 – David Grubb, Charlene Harvey, and William Hambrecht.
- The Trust has been involved in several major political controversies. In 2010, the Board proposed to permit Gap owner and philanthropist Don Fisher to build a large new museum on the Presidio Main Post to house his extensive collection of modern art. This proposal was a lightning rod of controversy, and was eventually withdrawn following public outcry due to the inappropriate design of the building and its location in the historic center of the Presidio.
- Last year, the Trust issued a call for proposals for a "major cultural institution" to replace the former post commissary, currently housing a large sporting goods store. From sixteen responses, the Trust selected three for full consideration: one from filmmaker George Lucas; one from the nonprofit Golden Gate National Parks Conservancy; one from a group proposing an institute on sustainability.
- Lucas proposed a Beaux-Arts design museum to house his collection of American illustrative art, as well as the digital art from his Star Wars films. His proposal was criticized by many as too large, too tall, of an inappropriate design for the cultural landscape in which it would be sited, and having no thematic connection to the Presidio.
- Lucas secured the support of major Silicon Valley tech execs, Hollywood film industry luminaries, and key Bay Area elected officials, most notably Rep Nancy Pelosi, Sen Dianne Feinstein, Sen Barbara Boxer, and Mayor Ed Lee.
- The Parks Conservancy gained the support of a number of Bay Area civic leaders, community organizations, and park advocates. Key philanthropists, including the Evelyn and Walter Haas Jr Fund, and the Stephen D. Bechtel Foundation – which had provided over \$75 million to the creation of Crissy Field - supported the Conservancy proposal.

- NPS was invited by the Trust to serve as an advisor to the selection process. NPS sent three letters over the course of the deliberations outlining the park values we felt should be preserved. These letters highlighted the importance of the Crissy Field site in telling the story of the Presidio. NPS also called on the Trust to take the long view, and to slow down the process until the completion of a new below-grade vehicular approach to the Golden Gate Bridge (Presidio Parkway) that will allow an uninterrupted visitor experience of the Presidio from the heart of the post to San Francisco Bay.
- In late January, the Trust Board voted unanimously to reject all three final proposals, and to let the area evolve following completion of the new Presidio Parkway. Lucas was offered two alternative sites for consideration, but has not indicated whether he will consider those.
- The Secretary has talked with Leader Pelosi about this issue on a number of occasions, including a meeting last April.

Dog Management at Golden Gate National Recreation Area

- Since 2002, Golden Gate National Recreation Area (GGNRA) has been developing a plan for dog management of the park. The goals of the plan are to ensure visitor safety, provide for a variety of visitor experiences (with and without dogs), and protect park resources for the future.
- In 1979, the GGRNA's Citizen's Advisory Committee adopted a dog management policy, known as the 1979 Pet Policy. It identified major areas of the park for on and off leash dog use, but it generally did not address the specifics of each area, consider any other park uses, resources, or needs, and it did not receive any environmental analysis as to its impact.
- The dog management planning process followed a court decision which held that unless the park promulgated a federal regulation specific to GGNRA, it could not implement the National Park Service's existing regulations prohibiting off leash dogs, because it deviated from the 1979 Pet Policy.
- A plan is needed because as both visitation and dog use have skyrocketed, conflicts have increased, resources have been impacted, visitor and employee safety has been compromised, and many users feel excluded from prime areas of the park because of the lack of dog management in general, and controls on off leash dogs, specifically. From 2008-2011, there were over 2700 law enforcement incidents in the park involving dogs.
- In January 2011, the park submitted a Draft Dog Management plan for 5-month public review. Over 4700 individuals responded with over 8,000 comments. Following review of the comments, changes in the alternatives, review and incorporation of new information and studies, and the addition of a new 3700 acre parcel (Rancho Corral de Tierra) in 2011, the park decided to issue a Supplemental Draft Dog Management Plan in September 2013.
- The comment period on this second draft plan (also 5 months) closes on February 18, 2014. Thus far, over 2000 comment letters have been received.
- The plan recognizes that dog walking, if managed effectively, can be a healthy, appropriate use of the park in areas where it does not pose conflicts with other visitors, nor damage park

resources. The plan's preferred alternative proposes off leash dog use in seven areas of the park, and on-leash use in many more park areas.

- Many off leash advocates feel the park's proposal constitutes a major reduction in dog opportunities, and believe that requiring a dog to be on leash is tantamount to banning dogs from an area. Many environmentalists feel that the park's proposals to accommodate off leash use at all are an unwarranted concession of park resources to dogs, and that dogs only belong on leash in limited, fenced areas far away from prime resources.
- If the park's preferred alternative is implemented, GGNRA will be the only one of the 401-unit national park system that permits any off leash dog use.
- Off leash dog advocates have mounted a well funded political campaign, including hiring a Washington lobbyist, to resist change to the status quo. They have inundated the offices of elected officials with targeted messages opposing the park's efforts.
- Environmental advocates have recently begun to put out action alerts in an attempt to counter the pressure created by off leash dog advocates.

Exemp. 5 Atty-Client potential litigation

- Dog advocates are now trying to enlist elected officials to support creation of a "Recreation Users Roundtable" through which the park would be required to run implementation of the dog management plan. The park does not support this notion, because it could have the effect of stalling out progress on implementation. The track record on achieving consensus among user groups is poor. The park's 18-month attempt to bring stakeholders together in 2006 in a Negotiated Rule Making process resulted in failure to achieve any consensus, and the committee declared itself at an impasse and opted to disband.
- However, the park plans a robust public engagement process, including regular public meetings, to keep the public fully aware of progress on plan implementation, and to enlist the public's help in the success of the plan.
- Last year, the City of San Francisco passed an ordinance on commercial dog walking, with a limit of 8 dogs per commercial dog walker. The park's plan proposes a limit of 6 dogs per dog walker, which is consistent with most jurisdictions locally and around the country.
- In order to prevent commercial dog walkers from shifting to NPS land while the park's rules are still being developed, the park intends to issue an interim Compendium change to limit dog walkers to a maximum of 6 dogs per person. This change will be released for public comment in early March 2014, and will be in effect until the park's final rule on dog walking is in place in late 2015.
- Timeline going forward –
 - March/April 2014 – Initiate Compendium limitation on commercial dog walking
 - Spring/Summer 2014 – Review of comments on supplemental Draft Dog Mgt Plan
 - Fall 2014 – Release of Proposed Rule on Dog Walking for public comment
 - Winter/Spring 2015 – Review of comments on Proposed Rule; preparation of Final Plan/EIS and Rule
 - Mid 2015 – Release of Final Plan/EIS, Record of Decision
 - Late 2015 – Release of Final Rule

February 3, 2014

Congresswoman Nancy Pelosi
235 Cannon HOB
Washington, D.C. 20515

**Re: Support for Improved Dog Management in the Golden Gate National
Recreation Area**

Dear Congresswoman Pelosi,

We write to express our support for improved dog management at the Golden Gate National Recreation Area (GGNRA). We believe that the National Park Service's (NPS) proposed Dog Management Plan and Draft Supplemental Environmental Impact Statement comprise a necessary first step to bring order, sustainability and equity to this unique national park in an urban region.

Since its creation, the GGNRA's visitation and use has dramatically increased to more than 16 million annual visitors. During this time, the number of recreational activities has increased and diversified, mainly at popular destinations such as Crissy Field, Fort Funston, and Ocean Beach. Additionally, the NPS has learned much more about the park's unique natural and cultural resources it is entrusted to protect for current and future generations.

The NPS has recognized that dog-related recreation in the GGNRA is resulting in harm to the park's natural and cultural values and is degrading the park experience for many user groups that the park was created to benefit. Moreover, the status quo is putting park users, employees, wildlife and dogs at undue risk because of the lack of regulation and enforcement. It is clear that the status quo is unsustainable and that there are solutions to accommodate all visitors to the park.

If implemented, the GGNRA Dog Management Plan will be the largest accommodation for dogs in any unit of the national park system. The GGNRA's proposal reflects a multi-year and multi-million dollar effort to accommodate dog walking and balance competing local stakeholders' demands and interests, while recognizing that this park welcomes visitors from around the country and globe to its iconic parklands.

The GGNRA's proposal for San Francisco lands would increase trail access for on-leash dog walking. The proposal would also designate several year-round, off-leash areas in San Francisco at Fort Funston (headlands and beach), Ocean Beach, Crissy Field, and Fort Mason, providing ample room for dogs and their owners to recreate and socialize.

Many of the co-signers of this letter believe that GGNRA's proposal does not go far enough to ensure accessibility to all user groups, especially the elderly, disabled and families with children or to protect wildlife and habitats in the park. For example, a workable plan must provide for enclosed off-leash areas, which allow visitors, including those with leashed-dogs, to choose if

and when to have off-leash dog experiences rather than having the experience imposed upon them.

Opponents of the effort to manage dog walking in GGNRA often claim that GGNRA's proposal would dramatically reduce acres and trails available for dogs (e.g. "99.9% of GGNRA's 80,000 acres is unavailable for dog-walking"), but these claims are misleading and inappropriate for park policy making. For example, of the roughly 80,000 acres within the GGNRA legislative boundary, only a portion (roughly 18,000 acres) is directly managed by the NPS. The outdated 1979 pet policy that applies to GGNRA managed lands generically identified park locations for dog walking (e.g. Fort Funston and Lands End), failing to note that only a portion of these locations contain acreage accessible for dog walking due to cliffs, thick vegetation, and steep gradient. The GGNRA's proposal responds to site-specific details, providing a realistic map of available parkland for visitor use, and balancing the on-leash/off-leash dog-walking activities with other recreational activities, visitor uses, and wildlife protection mandates.

For example, the GGNRA's Fort Funston proposal retains popular off-leash use on the headlands and beach while removing dog-walking acreage from dangerous cliffs, thickly vegetated areas, and the southern headland where equestrian uses, hang-gliding, and a youth education center exists. At Crissy Field, the GGNRA's proposal strives to reduce conflicts by providing three different sections of beach use in addition to generous on-leash walking areas: one (the largest) for an off-leash dog experience, one (the smallest) free from dog walking, and one dedicated to protecting wildlife.

Enclosed please find a recent Editorial by the San Francisco Chronicle ("New GGNRA rules for dogs throw people a bone" - September 10, 2013), which applauds the NPS' efforts to develop a reasonable and locally responsive plan for all park user groups.

We ask that you join a broad coalition of groups, including Guide Dog Users, Inc., American Humane Society, American Society for the Prevention of Cruelty to Animals (ASPCA), and park user group advocates, to support improved dog management in the GGNRA and to help ensure that the NPS implements a policy that protects park visitors and resources. We would appreciate an opportunity to meet with your office to discuss this matter or to answer any questions you may have. Please contact Neal Desai at (415)-989-9925 or ndesai@npca.org.

Sincerely,

Neal Desai, Pacific Region Field Director
National Parks Conservation Association

Amy Meyer, Co-Founder
People for a GGNRA

Bob Planthold, Member
former Negotiated Rulemaking Committee,
Disability Advocate

Arthur Feinstein, Executive Committee
San Francisco Bay Chapter, Sierra Club

Jake Sigg, Conservation Chair
Yerba Buena Chapter of the California
Native Plant Society

Michael Lynes, Executive Director
Golden Gate Audubon Society

<http://www.sfgate.com/opinion/editorials/article/New-GGNRA-rules-for-dogs-throw-people-a-bone-4800092.php>

San Francisco Chronicle

New GGNRA rules for dogs throw people a bone

Tuesday, September 10, 2013

Thousands of San Francisco dogs need a place to paw the ground and fetch a stick. But many of the best spots are also popular with bird-lovers, sunbathers, picnickers and families with kids. That's why a federal plan that controls dog access to beaches, trails and open areas makes sense.

Dog owners have fought a years-long effort to keep favorite places open for their animals. They're up against federal authorities who are drafting new rules for the Golden Gate National Recreation Area, which is handling more visitors than ever to beaches and coastline areas spread across three counties.

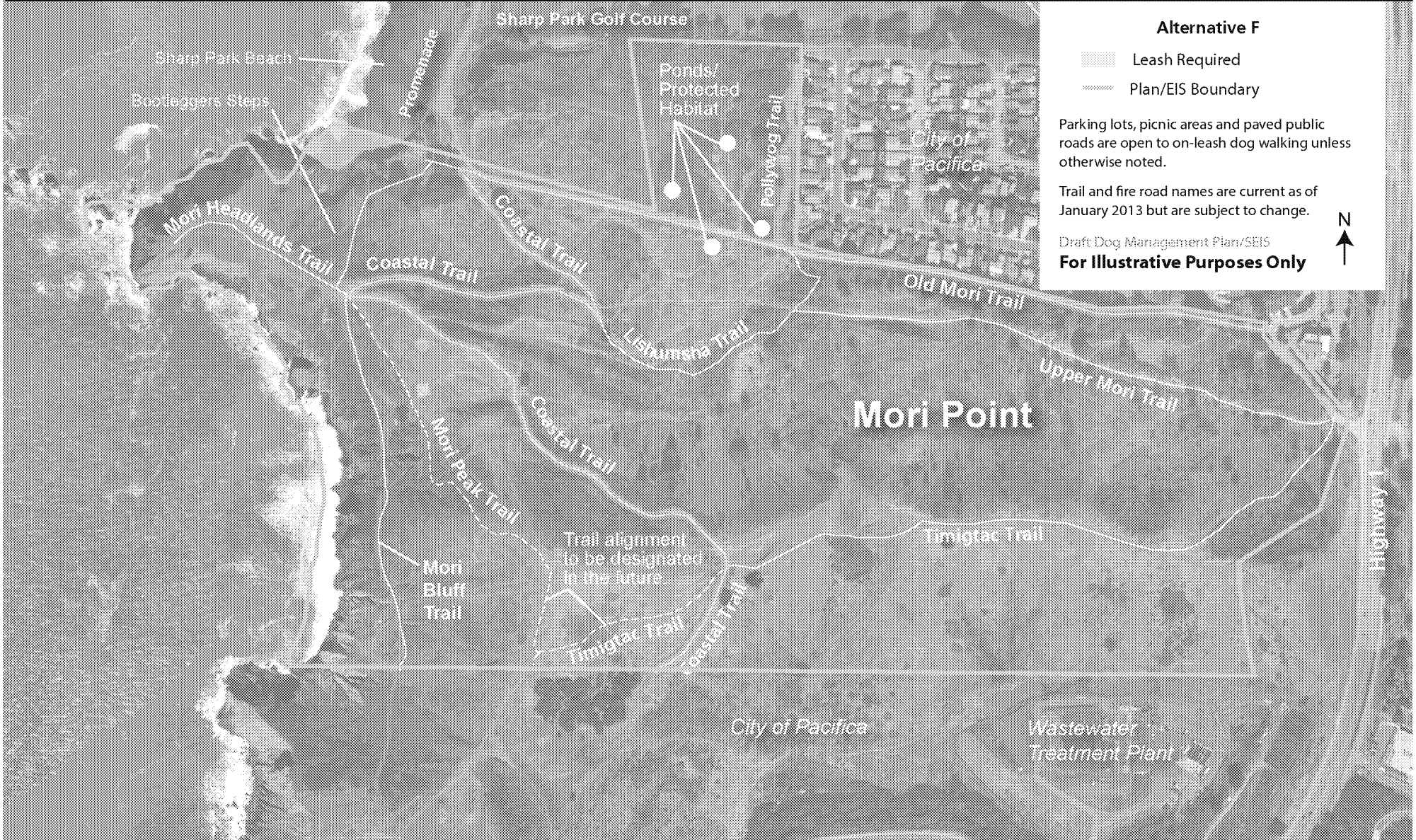
The results, subject to further tweaks, won't make everyone happy. Crissy Field, now one of the city's most crowded stretches of sand and water on a sunny day, will be divided up with dogs pushed out of their usual haunts. But the rule will give everyone else - walkers, runners, kids building sandcastles - a break from rambunctious animals.

It's all about balance, a notion that's lost on many dog owners, who can still walk their pets a few hundreds yards away. The same divide-and-share concept will prevail at Fort Mason and Fort Funston, two other San Francisco spots where dog owners and others clashed over the rules. Dogs on leash will be permitted at Muir Beach in Marin County and in parks in San Mateo County that are also included in the federal system.

The changes were launched two years ago by the National Park Service, which noticed that growing crowds along Ocean Beach and Presidio-area beaches were spurring complaints. The suggested rules, in turn, brought on 4,713 comments in a process that's churned out thousands of pages of studies, maps and alternatives.

Enough already. Dogs deserve a place in the outdoors, and so does everyone else. It makes sense to share this scarce space without letting one group take over.

Map 17-F: Mori Point



Alternative F

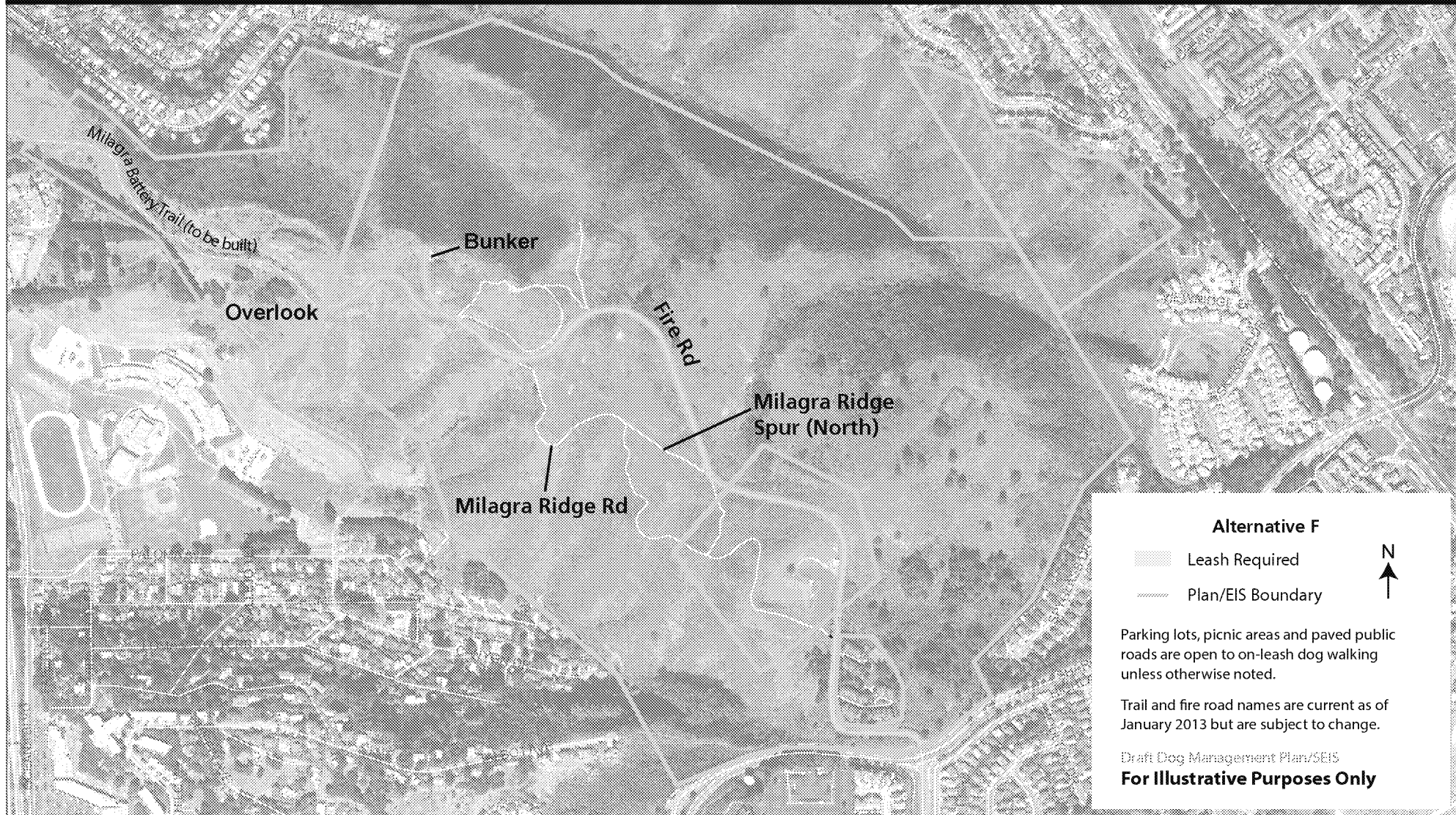
- Leash Required
- Plan/EIS Boundary

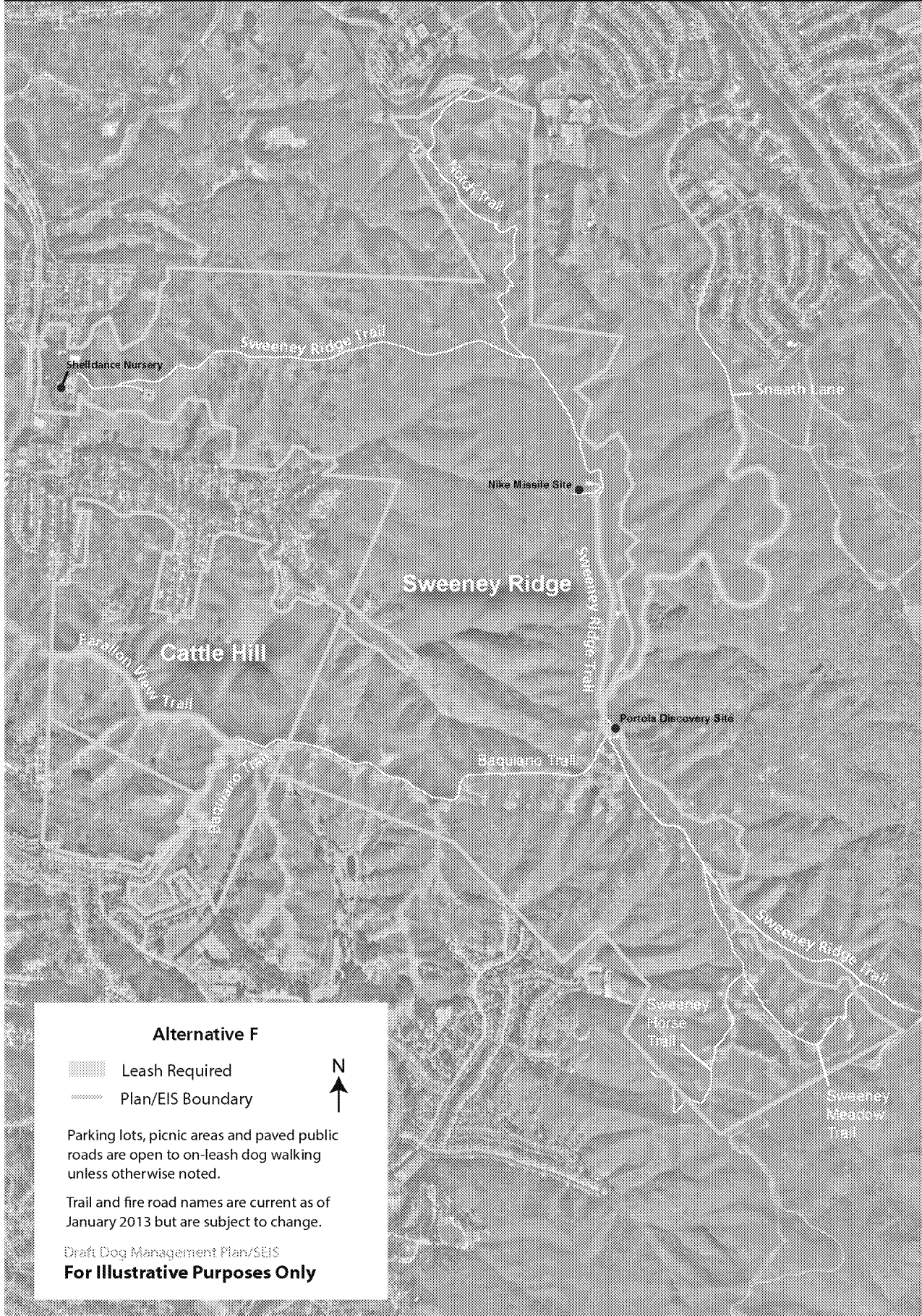
Parking lots, picnic areas and paved public roads are open to on-leash dog walking unless otherwise noted.

Trail and fire road names are current as of January 2013 but are subject to change.

Draft Dog Management Plan/SEIS
For Illustrative Purposes Only







Alternative F

Leash Required

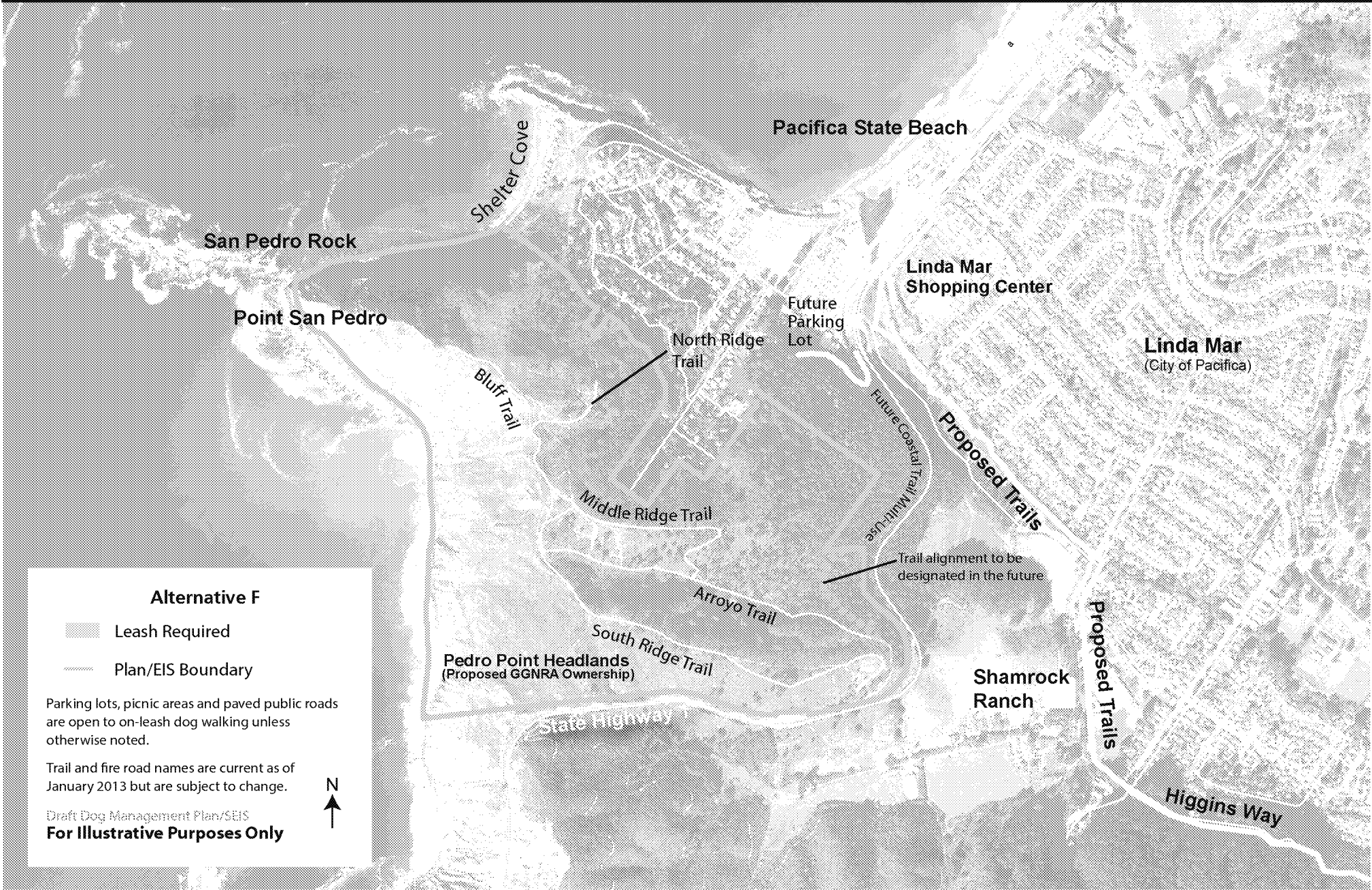
Plan/EIS Boundary

N
↑

Parking lots, picnic areas and paved public roads are open to on-leash dog walking unless otherwise noted.

Trail and fire road names are current as of January 2013 but are subject to change.

Draft Dog Management Plan/SEIS
For Illustrative Purposes Only



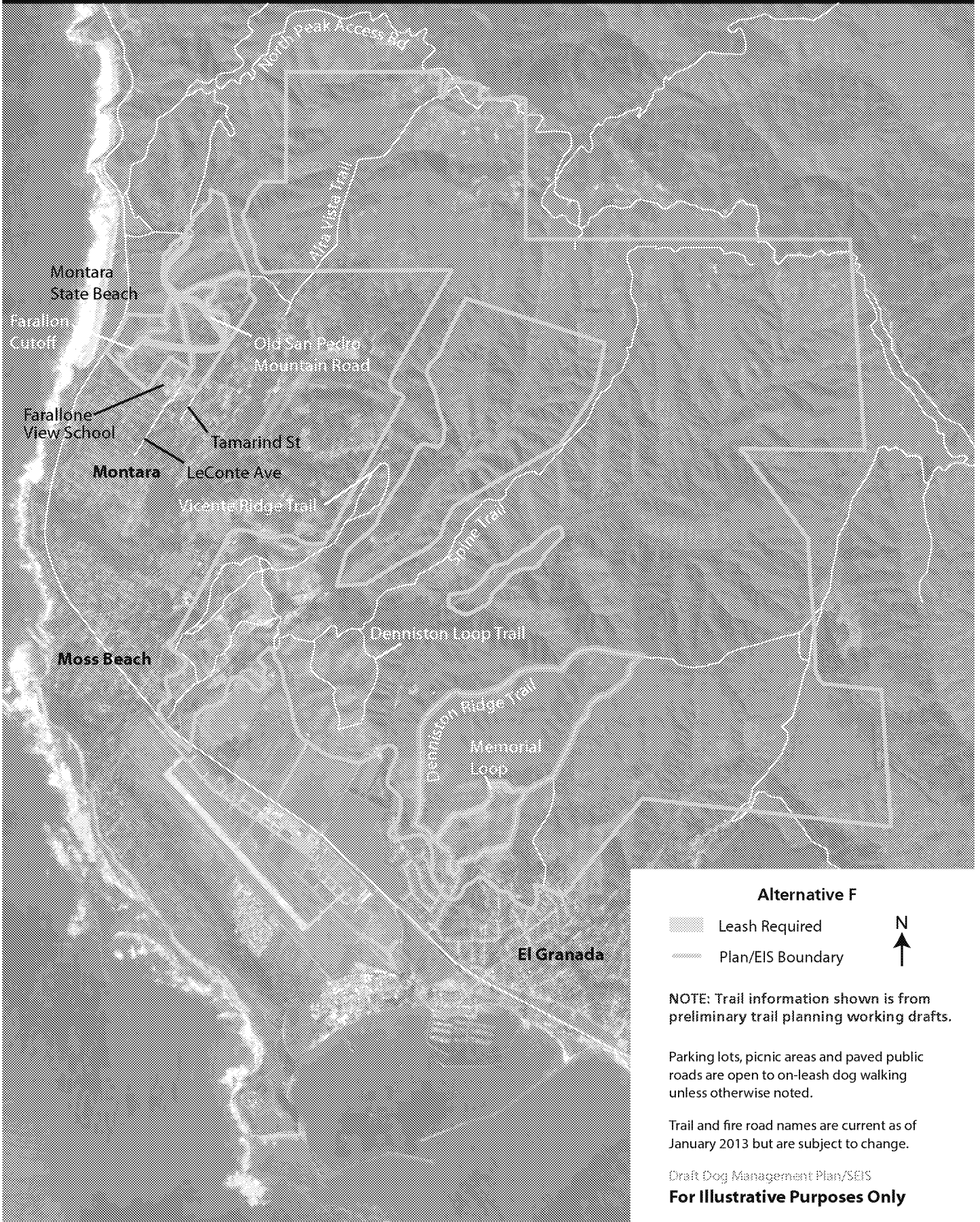
Alternative F

- Leash Required
- Plan/EIS Boundary

Parking lots, picnic areas and paved public roads are open to on-leash dog walking unless otherwise noted.

Trail and fire road names are current as of January 2013 but are subject to change.

Draft Dog Management Plan/SEIS
For Illustrative Purposes Only



EVENT MEMORANDUM FOR THE SECRETARY

YOUTH INITIATIVE ROUNDTABLE DISCUSSION, PRESS CONFERENCE, STUDENT Q&A, AND SERVICE PROJECT

DATE: November 7, 2013
LOCATION: Crissy Field, Golden Gate National Recreation Area, San Francisco, CA
TIME: 11:00AM – 1:30 PM
FROM: Howard Levitt, Director of Communications and Partnerships, GOGA, NPS

I. PURPOSE

[OUR BEST ATTEMPT - NEEDS DOI REVIEW]

You will meet with an invited group of outdoor industry leaders to discuss the importance of the Youth Initiative in helping connecting with the next generation, and how the private and public sectors can best work together to achieve success.

You will also hold a press conference on the Youth Initiative with these leaders in attendance, plus San Francisco middle school principals, representatives of the prominent youth corps in the area (San Francisco Conservation Corps; Conservation Corp of the North Bay; Civic Corps; Treasure Island Job Corps; and Student Conservation Association), as well as leaders of several local conservation groups, such as NPCA.

Immediately following the press conference, you will meet briefly with students from Project Wise, a hands-on field science program comprised of high school students from nearby Galileo High School. At this meeting, you will hold a Q&A on questions the students have about your work, and about their future.

Finally, you will participate in a service project at Crissy Field with 10-15 corpsmembers affiliated with the local conservation corps.

II. PARTICIPANTS

See attached list.

III. AGENDA

11:00 AM **YOU** will arrive at the Crissy Field Center and proceed to the gathering room, where a group of +/- 10 executives from outdoor product manufacturers will be waiting. **You** will meet each individual.

11:10 AM **YOU** start the meeting by welcoming the participants and offering very brief introductory comments.

- 11:50 AM **YOU** offer your closing thoughts, and conclude by thanking participants for their time and commitment to achieving the vision of the Youth Initiative.
- 12:00 Noon **YOU** walk to the plaza immediately in front of the Crissy Field Center, accompanied by Regional Director Christine Lehnertz and Golden Gate NRA Superintendent Frank Dean.
- 12:05 PM **YOU** stand next to the podium as you are introduced by Regional Director Christine Lehnertz. You approach the podium and deliver your prepared remarks, then field questions from the media in attendance.
- 12:25 PM **YOU** conclude the press conference and return inside the Crissy Field Center.
- 12:30 PM **YOU** will meet and answer questions from +/- 25 high school students from Galileo High School who participate in Project WISE (Watersheds Inspiring Student Education), a program teaching students about the environment of the Presidio.
- 12:45 PM **YOU** thank the students and proceed back outside the Center. Outside, you will meet 10-15 conservation corpsmembers and will proceed to a site nearby for a 45 minutes service project.
- 1:30 PM **YOU** thank the corpsmembers and depart to your next engagement, accompanied by [names].

III. KEY FACTS/HOT TOPICS

- Crissy Field received over \$35 million in private philanthropy for a 1999-2001 transformation by GOGA's nonprofit partner, Golden Gate National Parks Conservancy.
- Donations included \$18 million from the Evelyn and Walter Haas Jr Fund – until this past Sept, the largest single cash gift to any national park area.
- In Sept 2013, the Parks Conservancy received a gift of \$25 million from the Stephen D Bechtel Foundation for new parkland in the Presidio.
- Crissy Field Center is world renowned for its programming for youth leadership and stewardship. It is the epicenter of GOGA's extensive outreach to diverse communities.
- Crissy Center programs reach 25,000 youth each year, and has frequently hosted dignitaries such as Secretary Salazar and the Goldman Environmental Prize winners.
- Crissy Field Center is rated by LEED as one of the top 15 most efficient buildings in the world. The building itself is a teaching opportunity for Center youth programs.
- Wind turbines at Crissy Field Center are part of a pilot testing the feasibility of small scale wind energy generation. Center also has an Electric Vehicle Plug-in Station.
- NPS, Presidio Trust, and Golden Gate National Parks Conservancy have formed a Park Youth Collaborative to coordinate a vast array of programs targeting youth.
- Golden Gate NRA has a robust "Parks as Classroom" program serving thousands of Bay Area students with place-based programs the meet curricula frameworks.

V. TALKING POINTS/REMARKS (IF APPLICABLE)

DOI to provide

VI. BACKGROUND

Crissy Field Center programs are an excellent example of the application of the youth stewardship principles of your Youth Initiative.

VII. ATTACHMENTS

List of probable participants is attached. Also attached are talking point on Golden Gate National Recreation Area's contentious dog management planning process. These are provided in case the issue comes up from the media or invited participants.

ATTACHMENTS

NAMES OF PROBABLE ATTENDEES:

National Park Service

Christine Lehnertz, Regional Director, Pacific West Region
Frank Dean, Superintendent, Golden Gate NRA
Aaron Roth, Dep Supt, Golden Gate NRA
Howard Levitt, Director of Communications and Partnerships, Golden Gate NRA
Michele Gee, Chief of Interpretation and Education, Golden Gate NRA
Lynn Fonfa, Education Program Manager, Golden Gate NRA

Golden Gate National Parks Conservancy

Greg Moore, President and CEO
Doug Overman, Executive VP
David Shaw, VP for Communications
Sue Gardner, Director of Park Stewardship
Randi Fisher, Trustee
Mark Buell, Chair, Board of Trustees
Charlotte Fiorito, Photographer

Crissy Field Center

Christy Rocca, Director
Charity Mayberry, Asst Director
Ernesto Pepito, Youth Programs Director

San Francisco Unified School District

Jeannie Pon – Assistant Superintendent - Leadership, Equity, Achievement & Design, SFUSD
Laura Moran – Chief of Staff, SFUSC
Balje Thiara – Assistant to the Chief of Staff, SFUSD
Richard Curci – Director of Middle Schools, SFUSD
Jeanne D’Arcy – Supervisor of MS Science and Math, SFUSD
Eve Arbogast – Supervisor of ES/MS Instruction and Curriculum, SFUSD
Jason Hannon – Aptos MS
Teresa Shipp – Denman MS
Kenneth Lee – Francisco MS
Michael Reichle – Giannini MS
Carline Sinkler – Hoover MS
Natalie Eberhard – MLK MS
Paul Quesada – James Lick MS
Joanna Fong – Marina MS
Tony Payne – Presidio MS
Michael Reimer – Roosevelt MS
Gloria Minjares – Visitation Valley MS
Aaron Chrisco – Salesforce.com Foundation – [NOTE: Salesforce founder Marc Benioff recently donated \$2.5 million for technology upgrades in every SF middle school]

San Francisco Conservation Corps

Names TBD

CivicCorps
Names TBD

Conservation Corps of the North Bay
Names TBD

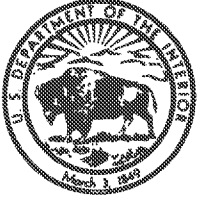
Student Conservation Association
Names TBD

Conservation Organizations
Names TBD

TALKING POINTS ON GOGA DOG MGT PLAN

Golden Gate National Recreation Area Draft Dog Management Plan/Supplemental EIS Talking Points for Secretary Jewell

- Golden Gate released a draft dog management plan for public review on September 6, 2013. The comment period closes on January 11, 2014.
- Dog management inspires the passion of a broad range of visitors to the park. Some people want less restriction on dog use in the park; others want to greatly limit or even eliminate dog walking.
- Golden Gate faces the difficult task of crafting a plan that takes the range of visitors' desires into account, while still protecting park resources for the future and minimizing conflicts between users.
- Golden Gate's plan acknowledges the importance of dog walking as an activity in the park, and proposes many ways to accommodate it, including areas for off-leash dog use.
- Golden Gate has an exceptional array of natural and cultural resources, including numerous threatened and endangered plant and animal species.
- I urge anyone who cares about the park to review the draft dog management plan and SEIS, and provide comments on the park's dog management website [[HYPERLINK "http://www.nps.gov/goga/seis.htm"](http://www.nps.gov/goga/seis.htm)]
- I can assure you that every comment will be carefully considered in preparing the final dog management plan, and that the rule the park develops will reflect the extensive public input that has characterized this process.



United States Department of the Interior

NATIONAL PARK SERVICE

GOLDEN GATE NATIONAL RECREATION AREA
FORT MASON, SAN FRANCISCO, CALIFORNIA 94123

IN REPLY REFER TO:

L30 (GOGA-CP)

SEP 17 2013

Martha Walters, Crissy Field Dog Group
Bill Bechtell, Montara Dog Group
P.O. Box 475372
San Francisco, California 94147

Dear Martha and Bill:

This letter responds to your August 27, 2013 letter in which you again expressed your concern over the No Action alternative at Rancho Corral de Tierra in the draft Dog Management Plan/Supplemental EIS, and your desire to assure the inclusion of off-leash dog walking in the range of alternatives.

As we mentioned in previous letters, the No Action alternative in the draft plan/SEIS, representing the existing condition under NPS management, is 36 CFR Section 2.15, under which dogs are permitted on leash throughout Rancho. However, the analysis of cumulative impacts addresses the historic (although illegal under San Mateo County regulations) off-leash use prior to acquisition by the park, and consequently concludes that there would be long-term moderate to major cumulative adverse impacts to dog walkers. Also, please note that the range of alternatives for Rancho does include a Regulated Off-leash Area (ROLA) in two alternatives, although a ROLA is not part of the Preferred Alternative.

As you know, the draft plan/SEIS was released for a 90-day public review on September 6, 2013. In the interest of fairness and equity to other members of the public who may comment on the draft plan/SEIS, please understand that further communication regarding this issue must be treated the same as all other public comment received on the draft plan/SEIS, with a response to substantive comments published in the final EIS.

We encourage your thorough review and comment on the draft plan/SEIS by December 4, 2013.

Sincerely,

Frank Dean
General Superintendent

Copies to:
Congresswoman Jackie Speier
Minority Leader Nancy Pelosi
Senator Dianne Feinstein
Senator Barbara Boxer
Congressman Jared Huffman
Jon Jarvis, Director, NPS
Christine Lehnertz, Regional Director, NPS Pacific West Region

Subject: Draft Agenda for Dog Mgt Plan Coordination mtg.

(Thursday, 4/28: 10:30-12PM); Location: Chris's office.

Call-in #: 1-866-732-4230, then dial Non-Responsive

A. Peer Reviews: Science, Studies, Monitoring(10:30-11:00)

-Discussion with Gary, Mike, Michael, Bill, Chris

B. Interim Commercial Dogwalking (11-11:05)

-2016 CDW permits and issues (Katie)

C. Enforcement Reports(11:05-11:20)

-Mutt March Protest: discussion(Noemi; Sintia; Xave; Tim)

-LE/USPP weekly field reports(Xave; Tim)

D. Proposed Rule (11:20-11:30)

-Updated major milestones toward Final Rule (Mike, Michael)

-County/regional regs matrix(attached) (Mike)

E. Communications (11:30-11:50)

-Status of Comms Actions(Pacifica mtg, etc.)(Howard)

-Strategic Comms: Next Steps (Howard)

-FOIA lawsuit status & needs: (Howard)

E. Preliminary Implementation Planning(11:50-12)

-Overview(Mike)



P.O. Box 475372 San Francisco, CA 94147-5372 Please Visit Our Website: www.crissyfielddog.org

April 21, 2016

Brian Aviles, Director
GGNRA Planning Division
Building 102, Ft. Mason
San Francisco, CA 94123

Dear Brian,

Thank you for the opportunity to meet with us about the Crissy Field Repair Centennial Project. It is our understanding that this project is comprised of two subprojects:

First project: the repair of the storm drains at East Beach and the resurfacing of the promenade with shale composite. CFDG supports this portion of the subproject. However, CFDG does not support the expansion of the promenade to 30' and the proposed changes to the East Beach parking lot.

Second project: reconfiguration of the East Beach parking lot. Below is a summary of CFDG's concerns with this subproject during our meeting with you and Kirsten on April 18, 2016.

1. The proposed plan to reconfigure the East Beach parking lot would create a parking lot with 24' of clearance in the aisle, which is not enough space for unloading sail boards, bikes, picnic supplies, or dogs, and would create congestion. The existing configuration allows unloading directly to staging areas near bathrooms and/or beach. The current plan would eliminate that possibility and makes the user experience for visitors with loads more difficult because of the congestion resulting from the proposed design that would force users into a few access points. Generally this plan moves visitors with loads east and south, away from where they want to be, and concentrates them in

ways that will cause conflict. We do not have the measurement for the existing major aisle but it appears to be wider than contemplated.

2. Current and historical uses of the east end of the parking lot adjacent to the bathrooms have generally been for commercial dog walker parking. It is gravel and not attractive for kids, board sailors, etc., and therefore keeps the conflicts down. The new plan would either force the commercial dog walkers out of this space, or require commercial dog walkers to compete with board sailors, paddle boarders, bicyclists and picnickers for staging areas. Under current dog walking management policies, on weekends conflicts will be escalated because dog walkers and other visitors with loads will compete for fewer spaces adjacent to staging areas. If the Dog Management Plan Preferred alternative is adopted without changes, the changes proposed for the east end of the parking lot would create increased user conflict because all dog walkers would need to travel east to middle beach for off-leash dog walking and the new configuration would force them across other users who are off-loading in the parking lot, therefore creating more chance for conflict between groups. Often the bike groups or board groups seem to stage next to their cars for parts, supplies, and security (so nothing is stolen).

3. The current use of the diagonal walkway is by walkers, dog walkers, runners, strollers, etc., coming from Marina Green to the promenade, and this current use rarely conflicts with parking. No data is available but based on our experience and observations we estimate that 80-90% of the time there are no cars parked near the path. Only on very high use times such as weekends and great weather days would there be a potential issue. This plan permanently moves that access in front of the Crissy Field Center.

4. The vegetative barrier planned between the parking lot and the promenade has several problems. First, the goal of hiding the cars is misplaced. It would preclude a common use of these lands; often during the week many visitors drive up the promenade and have lunch or just enjoy the view. That will not be possible if the vegetative barrier is implemented. Moreover, if the vegetative barrier grows at all, having the promenade hidden from the cars and vice versa poses a security risk at night. What comments has the GGNRA received about complaints about seeing the cars?

5. During the many special events held at East Beach when there is event parking, those with dogs in their cars are currently directed to the west and the beach for easy access, and event parkers seem to be sent to the east by people with flags and yellow shirts. With the new plan, that would no longer be possible, increasing potential for conflicts between event parkers and other visitor groups. And we anticipate that the board sailor groups and bike groups will be similarly directed.

6. Removing the staging areas adjacent to their cars and forcing groups to stage in the parking lot among moving cars increases congestion and increased risk of user

conflict. We are concerned for the safety of kids, dogs and other users who are attending to staging, all of whom may be distracted by the increased activity in this area, and may be subject to increased risk of user and vehicular collision in this condensed area.

7. By moving parking to the east and south closer to where the Sports Basement will be located will further increase congestion and demand for these parking spaces. We anticipate that more customers going to Sports Basement will park at East Beach because people will have to pay to park in the Sports Basement parking area. The existing plan spreads out the parking and helps to minimize those conflicts.

8. The proposed 30' promenade at East Beach is not warranted for normal use. The promenade funnels down to 20' for the rest and you will create bottleneck at bridge. We think it is better to have the promenade consistently spread out. Most days there is no need for 30'. In fact, it will probably make crossing the promenade more difficult, with 10 extra feet of cross-traffic to manage. Most conflicts are bike vs. other visitors (involving a speed differential). Making the promenade wider will not slow down bikes and reduce speed differential issues.

9. The impact analysis for visitor use just does not take into account how Crissy Field is currently used and will be used in the future.

10. Perhaps a solution for this subproject would be to repave the existing layout for parking, rather than the proposed reconfiguration.

11. We also mentioned about the importance of at least one design charrette during this environmental review process for the reconfiguration where the public at large can fully participate and weigh about their concerns and make suggestions.

Again, CFDG requests a time extension of the proposed project of at least two weeks so the public has the time to assess and submit their comments on the proposed CE of this project.

To date, we do not believe that the GGNRA has provided sufficient amount of time (only two weeks) for the public to respond to this proposed project, nor adequate amount of public outreach. An occasional roving ranger does not qualify as vigorous public outreach.

In addition, the GGNRA has failed to analyze the potential significant adverse cumulative impacts of the proposal in the context of its interactions with its immediate surrounding area, i.e., the rest of Crissy Field, Mason Street corridor, the long term use of the Crissy Field Center (temporary building), sea level rise impacts, and the overall negative impact on visitor experience of the reconfiguration of the east beach parking lot to the visitors at Crissy Field.

CFDG believes that at bare minimum an Environmental Assessment under NEPA is warranted by the GGNRA to properly assess and evaluate the impacts of the reconfiguration of the east beach parking lot. Moreover, given that the potential impacts and mitigation considerations of the current Crissy Field Repair Centennial Project proposal are identical to those involved in the ongoing Dog Management Plan (DMP) process (e.g., user conflict, access to recreation, design solutions), and this proposal involves one of the keystone recreation areas of the GGNRA being addressed in the DMP, CFDG believes that it is inappropriate to segment consideration and environmental review this proposal from the overall dog management plan processes which are ongoing. Accordingly we request that this proposal be considered as part of the overall DMP process, with potential significant adverse environmental impacts (including direct, indirect, and cumulative impacts, as well as alternatives and mitigation) being analyzed in context of the DMP draft rule and supplemental draft environmental impact statement. Failure to consider this proposal in that context will be a failure of GGNRA to meet its obligations under NEPA.

We would appreciate it if you would communicate with us as soon as possible about granting the public this important two-week extension of the public comment period, as we do not support the proposed CE for this project. CFDG would like a response to this request by COB April 21, 2016.

Thank you for the opportunity to meet with us this past Monday.

Sincerely,

Martha Walters

Martha Walters

Chair, CFDG

Cc: Christine Lehnertz, GGNRA Superintendent

Robert Edmonson, Chief of Staff to Democratic Leader Nancy Pelosi

Subject: Draft Agenda for Dog Mgt Plan Coordination mtg.

(Thursday, 4/21: 10:30-12PM); Location: Chris's office.

Call-in #: 1-866-732-4230, then dial Non-Responsive

A. Interim Commercial Dogwalking (10:30-10:45)

-2016 CDW permits and issues (Katie)

B. Enforcement Reports(10:45-11:00)

-Mutt March: 1st Amendment & permit discussion(Noemi; Sintia; Xave; Tim)

-LE/USPP weekly field reports(Xave; Tim)

C. Proposed Rule (11:00-11:20)

-Major milestones toward Final Rule (Mike, Michael)

-Outline of county/regional regs(attached) (Mike)

D. Communications (11:20-11:50)

-Status of Comms Actions(Howard)

-Strategic Comms: Next Steps (Howard)

-FOIA follow-up & Resources Needed: (Howard)

E. Preliminary Implementation Planning(11:50-12)

-Overview(Mike)

Subject: Draft Agenda for Dog Mgt Plan Coordination mtg.

(Thursday, 4/14: 10:30-12PM); Location: Chris's office.

Call-in #: 1-866-732-4230, then dial Non-Responsive

A. Interim Commercial Dogwalking (10:30-10:45)

-2016 CDW permits and issues (Katie)

B. Enforcement Reports(10:45-11:00)

-LE/USPP weekly field reports; and database query capability on citations, past & present(Xave; Pam/Tim)

C. Proposed Rule (11:00-11:20)

-Major milestones toward Final Rule (Mike, Michael)
-Outline of county/regional regs(attached) (Mike)

D. Communications (11:20-11:50)

-Status of Comms Actions(Howard, Erin?)
-Strategic Comms: Next Steps (Howard)
-FOIA follow-up & Resources Needed: (Howard)

E. Preliminary Implementation Planning(11:50-12)

-Overview(Mike)

Subject: NPS Proposed Rule elements and relevant County regulations

NPS Proposed Rule elements:

1. All dogs must have a current rabies vaccination.
2. All dogs would be required to be licensed and tagged in accordance with applicable ordinances of the county where the dog owner resides. (Note: In counties or municipalities where an **annual dog license** is issued that requires **proof of rabies vaccination**, a valid, current county or municipal license tag suffices for such proof).
3. An unattended dog is prohibited. (Unattended dog means a dog left without guardian in sight, tied or untied outside; or left in a parked vehicle, where it creates a nuisance, disturbs the peace and tranquility of the park or disturbs wildlife; or left where the dog could reasonably be expected to experience suffering or distress due to, for example, exposure to high temperatures, direct sunlight, or inadequate ventilation).
4. In a Voice and Sight control area, a leash for each dog must be carried by the dog walker but does not have to be attached to the dog, provided that the dog is under voice and sight control. (Voice and sight control means a dog that is within direct eyesight of the dog walker where the dog walker is able to both immediately recall directly to his or her side, without regard to circumstances or distractions, and attach a leash to the dog's collar).

East Bay Regional Parks:

When is a dog considered under control?"

Dogs are considered under control when they are within direct eyesight of the owner/handler and when they have the ability to quickly return to leash when called. Dogs that annoy, harass, or attack people, wildlife, livestock or other dogs, leashed or unleashed, or which enter leash-required or dog-prohibited areas, are presumed to be not under control.

Any person allowing their animal to be off leash must: a) Carry a leash for each dog in his/her possession; b) **Keep their dog or other animal under voice control and within sight at all times;** c) Clean up feces deposited by their dog or other animal and properly dispose of the feces; d) Immediately leash any dog or other animal showing aggressiveness toward people or other dogs and animals; e) Prevent dogs or animals from digging or damaging park resources;

"Is my dog required to have a license and rabies vaccination?"

Any dog found without a license or proof of rabies vaccination identification tag may be impounded by members of the District's police force, or other authorized employees in assisting the police.

"Am I required to purchase a permit to walk my dog?"

The East Bay Regional Park District has set up a dog permit program for commercial dog walkers and for people who walk more than three dogs at a time in the Regional Parks.

- **Six dogs at a time is the maximum number allowable** to walk in the Regional Parks.
- Commercial dog walkers are required to obtain a permit, regardless of how many dogs they walk at one time (limit of six).
- **Private individuals or families do not need a permit in order to walk up to three dogs at a time. Those who wish to walk four to six dogs must obtain a permit to do so.**

- Regardless of the number of dogs they are walking (maximum of six), commercial dog walkers will be directed to certain designated trails within each park.
- Private dog walkers who have a permit and are walking more than three dogs (maximum of six) will also be directed to these trails.

801.2 Leash Required Areas (Developed Areas).

- **h. No dog, cat, or other animal may be left unattended (if not contained) at any parkland.**

801.3 Leash Optional Areas (Undeveloped Areas). A dog may run at large under the control of its owner or handler... provided, however, that the owner or handler shall have a leash for each dog in his/her possession and **keep the dog under control at all times...** For the purpose of this subsection, **a dog is considered under control when the owner or handler is aware of its conduct and when it returns to the owner or handler when called. The owner or handler may not be aware of the animal's conduct when it is out of sight...** **Dogs are presumed to *not* be under control when:** ...They touch or jump on other park users who have not invited or engaged in interaction with the dog. vi. **They are not within sight of the owner or handler.** (added 4/12). d) **The number of dogs shall not exceed three per person,** except as permitted in 801.11.

801.11 Dog Walkers of 4-6 dogs (l). Any person who walks or exercises a dog or pet for a fee or who wants to walk more than three (3) personal pets must obtain and have in their possession a revocable annual permit from the General Manager or his/her designee to use designated District lands for this use. Such permits shall contain: a) Provisions that limit the number of dogs that can be walked either on or off leash at any one time. b) The permit fee to be charged by the District. c) The areas and trails where dogs can be exercised under the permit. d) **Appropriate insurance and hold harmless provisions.** e) **Any other conditions that the General Manager may find applicable.**

Any person allowing their animal to be off leash must: a) Carry a leash for each dog in his/her possession; b) **Keep their dog or other animal under voice control and within sight at all times;** c) Clean up feces deposited by their dog or other animal and properly dispose of the feces; d) Immediately leash any dog or other animal showing aggressiveness toward people or other dogs and animals; e) Prevent dogs or animals from digging or damaging park resources;

Marin county :

Chapter 2.05 Land Use Regulations – Dogs and Other Animals 2.5.10 Dogs and Other Animals: **Dogs and other domestic animals are allowed on the Marin County Open Space District(MCOSD) lands when under the direct and immediate control of a responsible person(see conditions below)...Dogs may not be left unattended at any time.**

Permitted Conditions in Marin county Open Space: (Note: Marin county parks do not allow off-leash)

1. **All dogs must be in view of the person, must be no more than 20 feet from the person, and must return to the person immediately when called (two calls with a return limit of 10 seconds).**
2. Dogs must not disturb visitors to the MCOSD lands and must be under physical control when in the presence of visitors. **Disturbance is defined as unwelcome touching, jumping on, displaying threatening behavior, and/or physically harming person(s), animal(s), or wildlife.**
3. Bagged dog waste may not be left at fire road access points or along fire roads.

4. **All dogs four months of age or more, brought onto the MCOSD lands, are required to have current licenses.**
5. Dogs must be screened for behavior problems and be able to demonstrate obedience to each person before walking on the MCOSD lands.

San Francisco county:

San Francisco Health Code

Article 1, SEC. 37. Keeping and Feeding of small animals, poultry and game birds.

(a)Number of animals. It shall be unlawful for any person, firm or corporation to keep or feed, or cause to be kept or fed, or permit to be kept or fed, on any premises over which any such person, firm or corporation may have control within residential districts, (1) more than three dogs of age six months or older without obtaining a proper permit and license to operate a dog kennel

Article 1, SEC 40-**Dog to be controlled so as not to commit nuisances.** All dog feces must be removed and people walking dogs must carry materials to remove feces.

SEC 41.15 **Dog License Requirement.** Every person owning, keeping or having control of any dog over 4 months must obtain a current license for each dog.

SEC 41.18-**Vaccination required for license. Dogs over age of four months required to have current rabies vaccination.** The owner, guardian or person having control or possession of the dog or cat for which said license or registration fee has been paid, and such tag issued, shall attach such license tag or registration tag securely to a collar around the neck of the cat or dog, or otherwise adequately secure such tag. **License tags shall be securely displayed upon dogs at all times**, except when the dog is confined to the owner's premises or displayed in any show or exhibition.

San Francisco Park and Recreation Department rules:

All dogs must be licensed and vaccinated before entering.

No dog less than 4 months old shall be permitted.

Female dogs in heat are not allowed.

No more than (3) dogs per owner are allowed at any one time...unless sponsored by or obtaining a permit.

Dogs must be under control of their owners at all times (ie. dog must immediately respond to commands)

Aggressive dogs((snarling, unwanted jumping) must be leashed immediately.

Don't leave dog unattended.

Keep your dog' s vaccination and license current.

San Mateo county:

Leash Law (part of the Prohibited Conduct section of the local laws)

All dogs are required to be on leash at all times and the leash must be continuously held by a competent person capable of controlling the dog whenever the dog is not in a fully enclosed area. This pertains to all public and private property, including the dog's own front yard if it is not fully enclosed to prevent the dog's escape. In addition, all dogs must be currently licensed before they are allowed to be on leash at all.

6.04.030 - Rabies vaccinations.

Every dog or cat owner, after his/her dog or cat attains the age of four (4) months of age and/or within ten working days of purchasing a license shall procure from a licensed veterinarian, an anti-rabies vaccination to be administered in the manner prescribed or approved by the State of California Department of Public Health. This vaccination shall be obtained prior to issuing a license for the dog or cat. In addition, proof of vaccination shall be provided to the licensing program.

6.04.040 - Dog and cat licenses.

(a) Requirements. An annual license fee shall be paid for every dog or cat over the age of four (4) months... Said annual license fee shall be first due when the animal reaches four (4) months of age or within 60 days after the dog or cat is acquired, and due on the anniversary date of the original purchase date each year thereafter...

(c) Tags. The Licensing Program shall procure plates or tags which bear the number of the license or registration. A record shall be kept with the name of the owner or possessor together with a description of the dog, cat, or wolf hybrid for which the license or registration is issued and the number of the license or registration, and a tag shall be provided to such person upon payment for such license or registration as provided by this code...

(e) Wearing of Tag Required. The owner of a dog, cat or wolf hybrid for which a license or registration is required shall affix such tag to a suitable collar, which collar shall remain on the dog, cat or wolf hybrid at all times.

6.04.070 - Prohibited conduct.

No owner or possessor of any animal shall cause or permit it to do any of the following:

(a) To be upon any public street, sidewalk, park, school ground, any public property, or upon any unenclosed premises in this jurisdiction unless the animal is properly licensed, if such licensing is necessary hereunder, and under the control of the owner by being saddled, harnessed, haltered, or leashed by a substantial chain, lead rope, or leash, which chain, lead rope, or leash shall be continuously held by some competent person capable of controlling such animal...

(c) To suffer or permit such animal to habitually bark or meow or act in such a manner as to continuously disturb the peace of any citizen or to be a public nuisance.

(d) To be without proper and adequate food, water, shelter, care, and attention as described to in section 597(f) of the Penal Code.

6.04.080 - Protection of animals in motor vehicles.

(b) No person shall leave a dog or other animal in any unattended motor vehicle without adequate ventilation, sanitary conditions, or in such a manner as to subject the animal to extreme temperatures which adversely affect the animal's health or safety.

	A	B	C	D	E	F	G
1	<i>DOG REPORT FOR GGNRA JANUARY 2015- FEBRUARY 2016</i>						
2	MONTH AND TYPE	USPR Total#	USPP Total#	Location / CAD # / Unit/ Dispo	Location / CAD # / Unit/ Dispo	Location / CAD # / Unit/ Dispo	Location / CAD # / Unit/ Dispo
3	Jan-15	20	4				
4	Dog Complaint	5	2	Jefferson/Hyde SF010715-72 561/ Dog in car	Cavallo Lodge SF011115-48 514/ Dog in car	Rodeo Beach SF011815-49 514/ Dog hit by car/ GOA	Fort Funston SF012115-54 812/ Found Dog
5	Bite	2	0	Fort Funston SF011215-50 518	Ft Cronkhite SF011215-75 520		
6	Dog Walker	1	1	Great Meadow SF011515-45 811	Rifle Range SF012815-67 570		
7	Leash	12	1	Tennessee Vly SF010115-69 509	Stinson Beach SF010115-86 511	China Beach SF011015-38 812	Fort Baker SF011715-48 521
8	Leash Continued	—	—	651 Pt Lobos SF013015-45 528			
9	Feb-15	22	7				
10	Dog Complaint	6	4	Sutro Baths SF020915-44 515	Baker Beach SF021515-50 M88/ Dog abuse	Fort Funston SF021515-65 812/ Stray Dog	Baker Beach SF021915-59 815/ Dog Fight
11	Bite	1	1	Baker Beach SF020115-54 814	Cavallo Lodge SF021115-46 571		
12	Dog Walker	3	0	Fort Funston SF020215-60 515	Rifle Range SF021915-52 592	Great Meadow SF022515-53 515	
13	Leash	12	2	Ocean Beach SF020115-48 515	Owl Trail SF020115-65 571	Fort Baker SF020115-95 509	Stinson Beach SF020315-56 571
14	Leash Continued	—	—	Tennessee Vly SF022015-58 511	Tennessee Vly SF022215-32 528		
15	Mar-15	9	4				

	H	I	J	K	L	M	N	O
1								
2	Location / CAD #/ Unit/ Dispo	Location / CAD #/ Unit/ Dispo	Location / CAD #/ Unit/ Dispo	Location / CAD #/ Unit/ Dispo	Location / CAD #/ Unit/ Dispo	Location / CAD # / Unit/ Dispo	Location / CAD # / Unit/ Dispo	Location / CAD # / Unit/ Dispo
3								
4	Muir Beach SF012315-55 560/ Dog Viol	Bay Area D. M. SF012815-85 570/ Dog in car	China Beach SF013115-84 812/ Dogs on beach					
5								
6								
7	Tennessee Vly SF011715-54 521	Tennessee Vly SF011715-57 521	Rifle Range SF011815-42 592	Ocean Beach SF011915-26 518	Oakwood Vly SF012315-18 511	Stinson Beach SF012315-51 570	Kirby Cove SF012515-53 561	Murray Circle SF012815-20 516
8								
9								
10	Fort Funston SF022015-35 802/ Dog Threatened	Tennessee Vly Sf022115-40 521/ Dogs on Trail	Tennessee Vly SF022115-43 521/ Dogs in closed area	Tennessee Vly SF022115-44 521/ Dogs in closed area	Tennessee Vly SF022115-45 521/ Dogs in closed area	Tennessee Vly SF022115-48 521/ Dogs in closed area		
11								
12								
13	Tennessee Vly SF021315-53 512	TN Vly Stables SF021415-34 525	Tennessee Vly SF021715-51 575	201 Macarthur SF021915-24 811	Miwok Trail SF022015-42 521	Bobcat Trail SF022015-43 521	Ocean Beach SF022015-49 874	Ocean Beach SF022015-52 521
14								
15								

	A	B	C	D	E	F	G
16	Dog Complaint	1	4	346 W Pacific SF030815-43 899/ Dog in car	Great Meadow SF031315-59 811/ Dog attacked	Baker Beach SF031415-48 814/ Dog abuse	Baker Beach SF031815-47 814/ Aggressive dog
17	Dog Walker	1	0	Fort Funston SF031915-42 519			
18	Leash	7	0	Ocean Beach SF030315-30 518	Ocean Beach SF030315-32 518	Ocean Beach SF030315-35 518	Muir Beach SF030815-14 571
19	Apr-15	10	7				
20	Dog Complaint	4	4	Fort Funston SF040215-26 K92/ Dog fight	Hyde/Jefferson SF041515-50 816/ Dog in car	Baker Beach SF041615-7 M89/ Dog fight	Muir Woods SF041615-24 513/ Dog in car
21	Dog Walker	0	2	Bay Ridge Trl SF041715-32 814	Navy Memor. SF042415-27 812		
22	Leash	6	1	Baker Beach SF040115-47 815	TN Vly Stables SF040415-22 525	Tennessee Vly SF040915-13 505	Great Meadow SF041215-30 518
23	May-15	14	1				
24	Dog Complaint	4	1	Fort Funston SF050615-28 515/ Dog abuse	201 Macarthur SF050615-66 811/ Abandoned dog	Fort Funston SF051415-61 525/ Dog attack	Tennessee Vly SF051615-50 528/ Dog on beach
25	Bite	1	0	602 Murray Ci SF050315-34 528			
26	Dog Walker	2	0	Great Meadow SF050215-64 500	Drown Fire Rd SF051415-40 571		
27	Leash	7	0	Stinson Beach SF050315-37 523	Sweeney Ridge SF050415-46 518	Wolfback Rdge SF051415-66 509	John Muir Gate SF052015-23 518
28	Jun-15	6	5				
29	Dog Complaint	2	2	Fort Funston SF060615-57 509/ Loose dog	Stinson Beach SF060815-28 523/ Dog in car	Ocean Beach SF062515-52 812/ Dog abuse	Fort Funston SF062815-71 812/ Dog fight

	H	I	J	K	L	M	N	O
16	1169 Greay Hwy SF032915-43 518/ WPA viols							
17								
18	Stinson Beach SF032315-49 571	Stinson Beach SF032315-51 571	Rodeo Beach SF033015-42 520					
19								
20	Ocean Beach SF042315-48 812/ Dog v wildlife	Ocean Beach SF042915-19 518/ Pet Contact	Stinson Beach SF043015-39 LG950/ Dog on beach	Kirby Cove SF043015-42 528/ Dog on beach				
21								
22	Sweeney Ridge SF041915-52 518	Milagra Ridge SF042515-59 525	Miwok/Hwy 1 SF042815-26 571					
23								
24	Bay Area D. M. SF052915-28 505/ Dog in car							
25								
26								
27	Fort Funston SF052615-52 518	Owl Trail SF053015-16 570	Milagra Ridge SF053115-52 518					
28								
29								

	A	B	C	D	E	F	G
30	Dog Walker	0	1	315 W Pacific SF061215-17 815			
31	Leash	4	2	Sweeny Ridge SF060115-51 518	Tennessee Vly SF060315-26 505	Tennessee Vly SF060515-25 525	Muir Beach SF061815-55 524
32	Jul-15	12	5				
33	Dog Complaint	6	3	Stinson Beach SF070115-48 LG951/ Dogs in car	Kirby Cove SF070415-54 M89/ Dog on beach	Baker Beach SF071115-50 512/ Aband dog	Fort Funston SF071315-36 515/ Dog in car
34	Bite	0	1	Baker Beach SF071215-37 M88			
35	Leash	6	1	Coastal Trail SF070915-49 512	Smiley/Menges SF071215-67 511	Great Meadow SF071315-37 521	Tennessee Vly SF071915-16 511
36	Aug-15	11	2				
37	Dog Complaint	6	1	Fort Funston SF081015-21 515	Green Gulch SF082215-44 504/ Dog v horse	Miwok Trail SF082715-47 512	Miwok Trail SF082815-49 594
38	Dog Walker	1	0	Alta Vista Trl SF082615-45 511			
39	Leash	4	1	Ocean Beach SF080115-52 802	Rancho Corral SF082415-38 518	Tennessee Vly SF082715-55 512	Deer Pk Fire Rd SF082715-71 596
40	Sep-15	16	4				
41	Dog Complaint	7	1	Tennessee Vly SF090315-35 594/ Dogs on trail	Stinson Beach SF090615-37 523/ Dog fight	320 Sunset Wy SF091315-38 596/ Found dog	Fort Funston SF091915-30 812/ Aggressive dog
42	Bite	1	1	Baker Beach SF090315-52 811	Stinson Beach SF090715-70 517		
43	Leash	8	2	Baker Beach SF090415-25 814	Tennessee Vly SF090415-27 594	Muir Beach SF090415-33 596	Tennessee Vly SF090415-66 524
44	Oct-15	15	4				

	H	I	J	K	L	M	N	O
30								
31	Tennessee Vly SF062015-48 K92	China Beach SF062015-52 M89						
32								
33	Fort Funston SF071815-11 525	Sutro Baths SF071915-46 K95/ Loose dogs	Muir Woods SF072515-37 528/ Service dog	Fort Funston SF073015-29 814/ Aggressive dog	1065 Mitchell SF073015-43 524/ Dog in car			
34								
35	Rodeo Beach SF072215-46 594	Great Meadow SF072215-68 521	Great Meadow SF073015-34 873					
36								
37	T1111 Warehs SF082915-34 596/ Found dog	Baker Barry Tnl SF083115-46 521	Cliff House SF083115-47 812/ Dog fight					
38								
39	Wolf Ridge Trl SF082815-26 512							
40								
41	Muir Woods SF091915-60 570/ Dog in car	Muir Beach SF092115-23 515/ Aggressive dog	Tennessee Vly SF092515-42 594/ Dog closed area	Tennessee Vly SF092615-33 595/ Dog on beach				
42								
43	Rodeo Beach SF090815-30 524	Fort Funston SF090815-38 518	Stinson Beach SF091115-46 596	Ocean Beach SF091815-49 802	Tennessee Vly SF091915-46 512	Miwok/Shore. SF093015-44 596		
44								

	A	B	C	D	E	F	G
45	Dog Complaint	8	4	Alta Trailhead SF100215-51 594/ Aggressive dog	Fort Funston SF100315-43 812/ Dog on cliff	Tennessee Vly SF100415-39 506	Tennessee Vly SF100415-40 572
46	Bite	1	0	Fort Funston SF101315-34 518			
47	Dog Walker	1	0	Tennessee Vly SF100515-56 571			
48	Leash	5	0	Drown Fire Rd SF100815-79 595	Rodeo Lagoon SF101415-21 596	Alcatraz SF102115-46 575	Mori Point SF102215-33 508
49	Nov-15	12	5				
50	Dog Complaint	7	2	Tennessee Vly SF111315-30 512/ Dog on trail	Tennessee Vly SF111415-30 512/ Dogs on beach	Muir Woods SF111415-35 570/ Dog in car	Fort Funston SF111515-45 509/ Dog bit horse
51	Dog Walker	1	0	Wolf Ridge SF110415-13 511			
52	Leash	4	2	Bobcat Trail SF110715-20 504	Ocean Beach SF110715-22 K92	Tennessee Vly SF111215-21 596	Ocean Beach SF111415-19 812
53	Resource Violation (dog)	0	1	China Beach SF110715-18 814			
54	Dec-15	7	4				
55	Dog Complaint	2	3	Muir Woods SF120215-30 572/ Service dog	Muir Beach SF121115-14 570/ Dogs in lagoon	680 Pt Lobos SF122615-35 812/ Aggressive dog	Fort Funston SF122615-48 812/ Lost dog
56	Dog Walker	0	1	Baker Beach SF120415-52 K92			
57	Leash	5	0	Fort Funston SF120215-42 518	Ocean Beach SF121515-35 518	Tennessee Vly SF121915-31 525	Fort Baker SF122215-78 572
58	Jan-16	15	7				

	H	I	J	K	L	M	N	O
45	Muir Woods SF100715-48 594/ Dogs refused	Aquatic park SF100715-56 811/ Abandoned dog	Rodeo Lagoon SF100815-71 512/ Dog in lagoon	Up. Fort Mason SF101315-29 811/ Dogs in car	Stinson Beach SF101615-43 570/ Pet contact	Fort Funston SF101715-62 509/ Dogs on beach	Coast View Trl SF102815-27 571/ Dogs on trail	Ocean Beach SF103115-15 812/ Dogs on beach
46								
47								
48	Fort Baker SF102715-28 572							
49								
50	Tennessee Vly SF111515-37 511	Mitchel/Hagget SF111615-25 520/ Aggressive dog	15 Marina Bl SF111915-5 811/ Dogs in car	Baker Beach SF112115-41 814/ Loose dogs	Ocean Beach SF112215-24 518/ Pet warning			
51								
52	Tennessee Vly SF112815-40 512	Tennessee Vly SF112815-41 512						
53								
54								
55	240 Funston Rd SF123115-105 811/ Dog in car							
56								
57	Tennessee Vly SF122515-33 562							
58								

	A	B	C	D	E	F	G
59	Dog Complaint	3	3	Fort Funston SF011016-29 518/ Dogs over cliff	Muir Beach SF011116-47 571	Fort Funston SF011116-60 K95/ Dog dispute	Fort Funston SF011416-32 525/ Aggressive dog
60	Bite	1	1	Rodeo Beach SF011316-66 512	680 Pt Lobos SF012216-24 812		
61	Dog Walker	2	0	Fort Funston SF012016-34 525	Fort Funston SF012016-36 518		
62	Leash	9	3	Milagra Ridge SF010416-34 518	Rancho Corral SF010716-22 562	China Beach SF010716-43 815	Stinson Beach SF010716-56 570
63	February 1-7 2016	4	1				
64	Dog Complaint	2	0	TN Vly Stable SF020116-54 572/ Dog in car	Muir Bch OL SF020116-35 571/ Dog off trl		
65	Dog Walker	1	0	Fort Funston SF020116-46 518			
66	Leash	1	1	Ocean Beach SF020416-58 812	Tennessee Vly SF020716-41 571		
67	COMPLETE TOTALS	173	60				

	H	I	J	K	L	M	N	O
59	Fort Funston SF012016-51 812/ Loose dog	Great Meadow SF012716-41 816/ Aggressive dog						
60								
61								
62	651 Pt Lobos SF011116-22 K95	Ocean Beach SF011316-35 518	Muir Beach SF011716-47 571	Fort Funston SF012416-30 518	Fort Funston SF012516-29 518	Ocean Beach SF012716-59 812	Ocean Beach SF013016-17 525	Stinson Beach SF013016-38 570
63								
64								
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67								

Proposed Rule for Dog Management in GGNRA
Public Meeting Stakeholder Follow Up

Objectives

- Identify successes and challenges from the perspective of key stakeholders
- Strengthen relationships with key stakeholders
- Capture lessons learned for future dog management engagement opportunities

Discussion Items and Questions

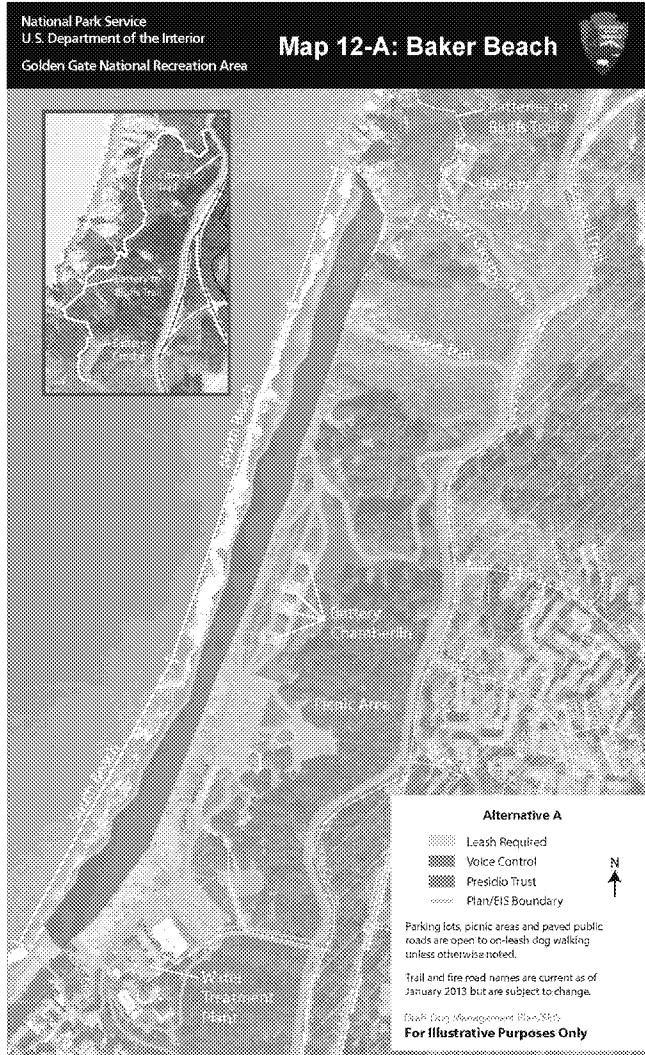
- **Review agreed upon public meeting objectives and format:**
 - Objectives:
 - Educate and inform the public about the Proposed Rule
 - Create a safe space for questions to be asked about the Proposed Rule and thoughts to be shared
 - Provide direction on how to comment on the Proposed Rule
 - Agenda & Format:
 - 30 minutes of open information stations with key NPS staff
 - 15-20 minute formal presentation by the Superintendent
 - 60 minute question and answer/statement period
 - Questions or statements kept to under one minute
 - 15-20 minutes of additional open information stations with key NPS staff & opportunity to speak one-on-one with the Superintendent
- **How well did we meet the objectives? Challenges? Successes?**
- **Was adequate information provided in advance of the public meetings?**
 - *Note: The agenda, how to ask questions, and venue details were provided via our website, social media channels, and through Constant Contact 7-10 days in advance of the first meeting.*
- **Constructive feedback for improving future public meetings? Things that worked that we should do again?**

Next Steps

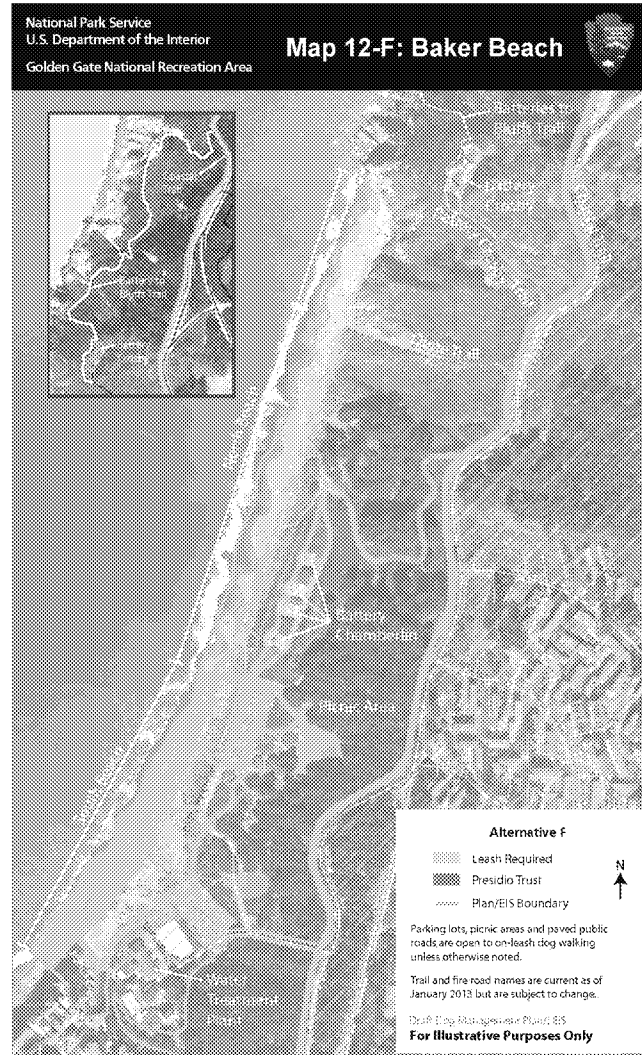
- Recording of a public meeting (from March 30 at the Bay Model), including the formal presentation and question and answer period, will be available on our website the week of April 11.
- Superintendent presentation (in PDF form) will be available to view or download on our website the week of April 11.
- Recap of the public meetings and reminder on how to comment on the Proposed Rule will be sent out through Constant Contact the week of April 11 (all sign ups received during the public meetings will be included in this message).

Baker Beach

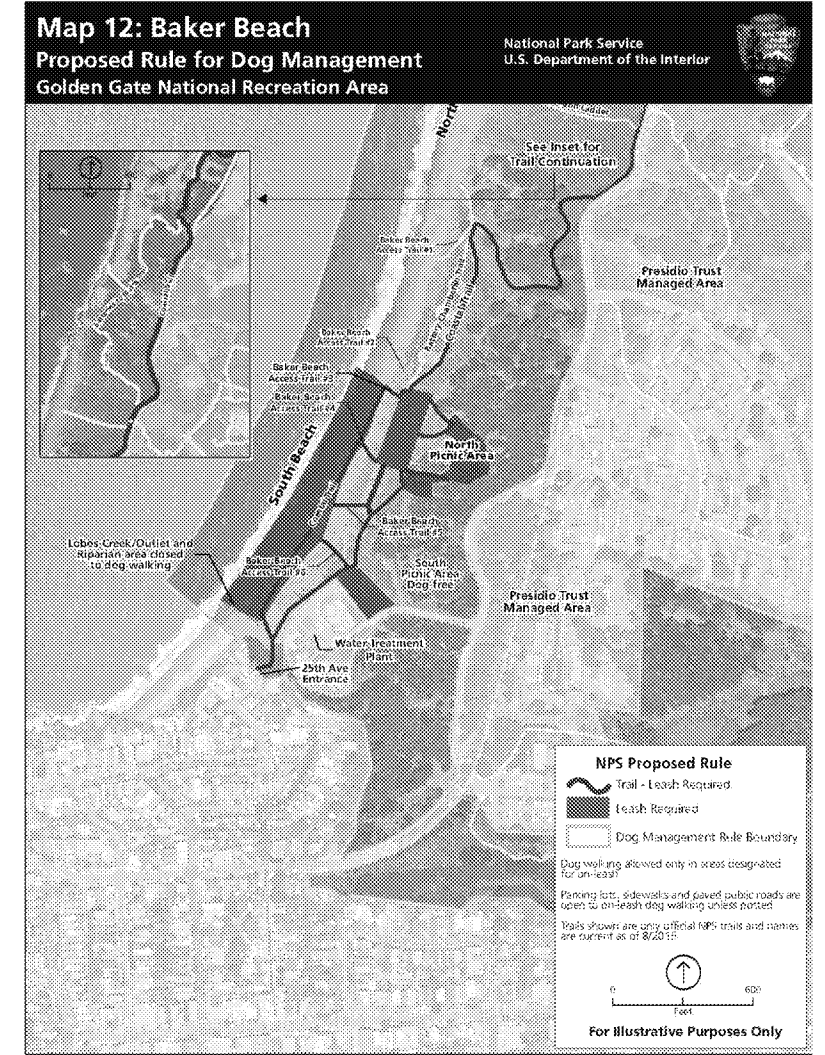
Existing Condition



Preferred Alternative



Proposed Rule

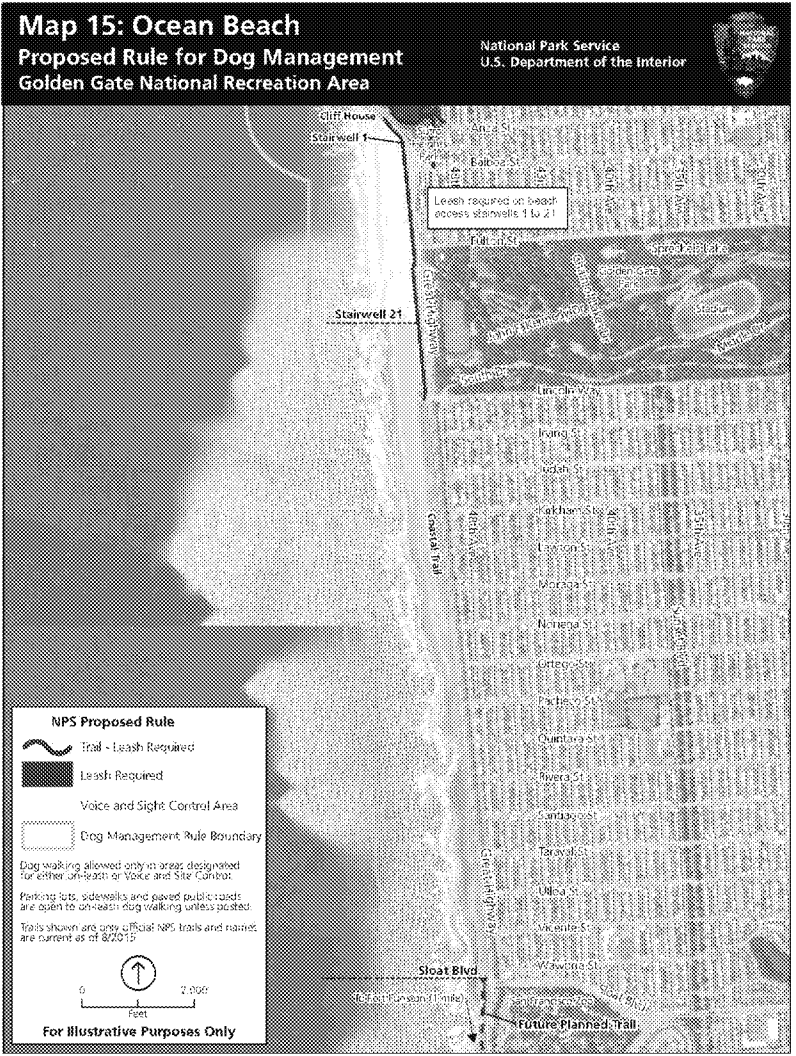
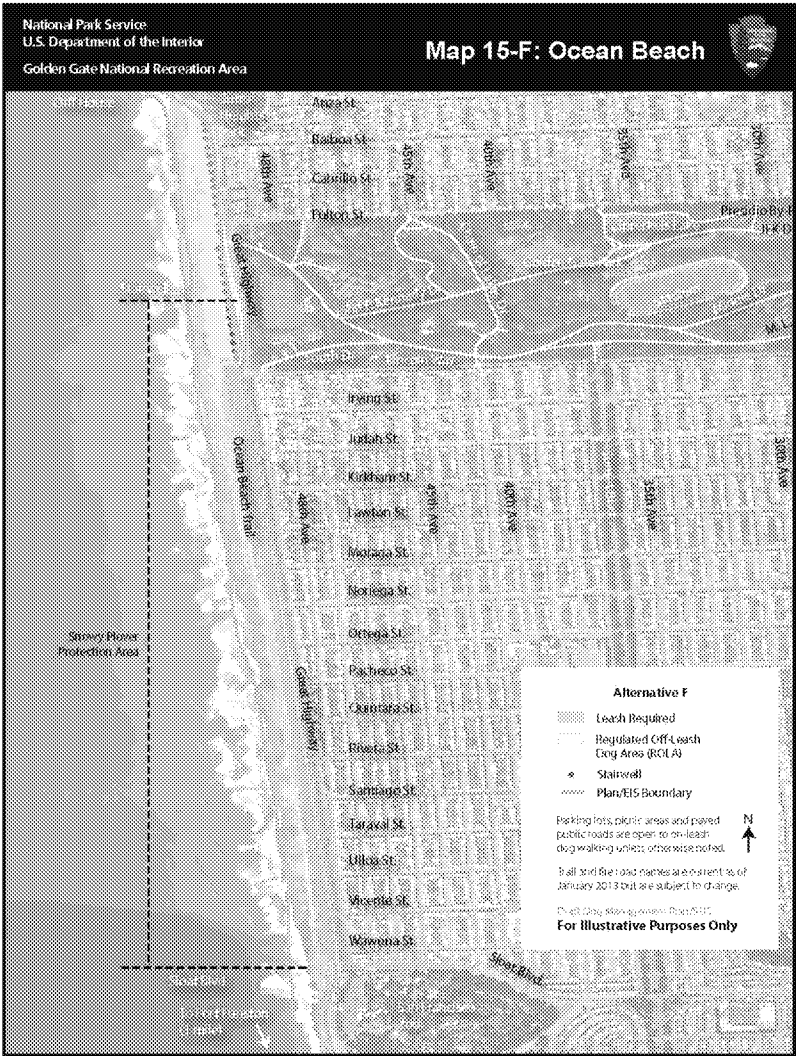
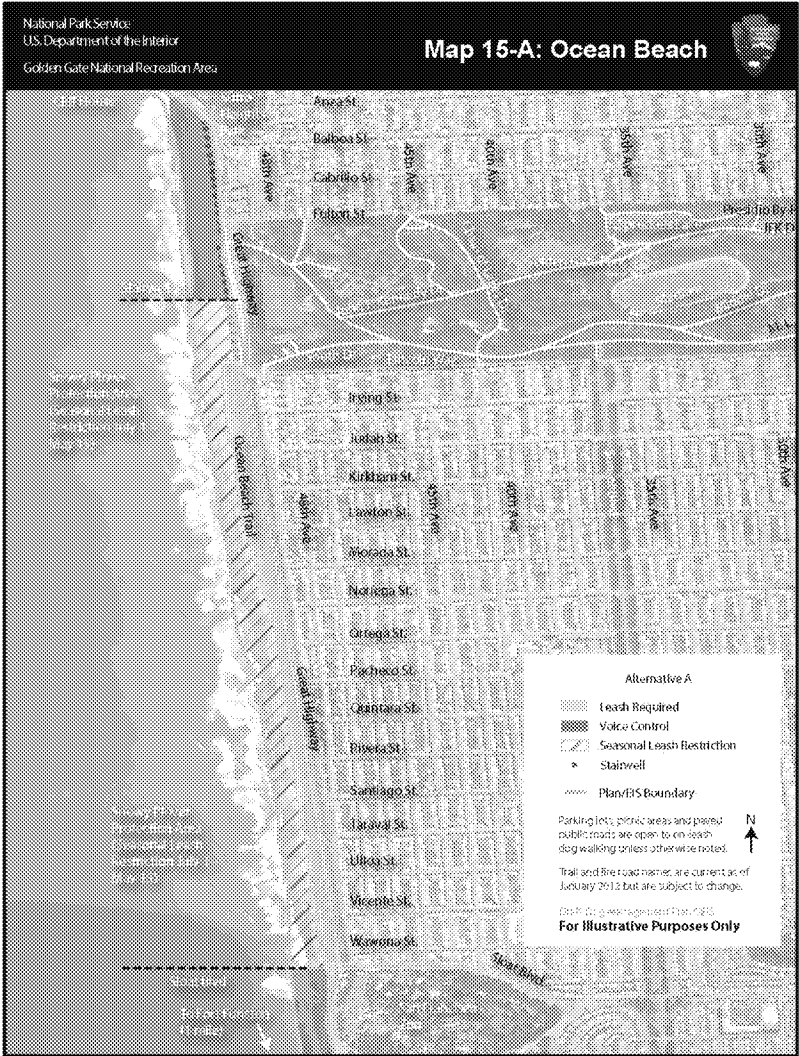


Ocean Beach

Existing Condition

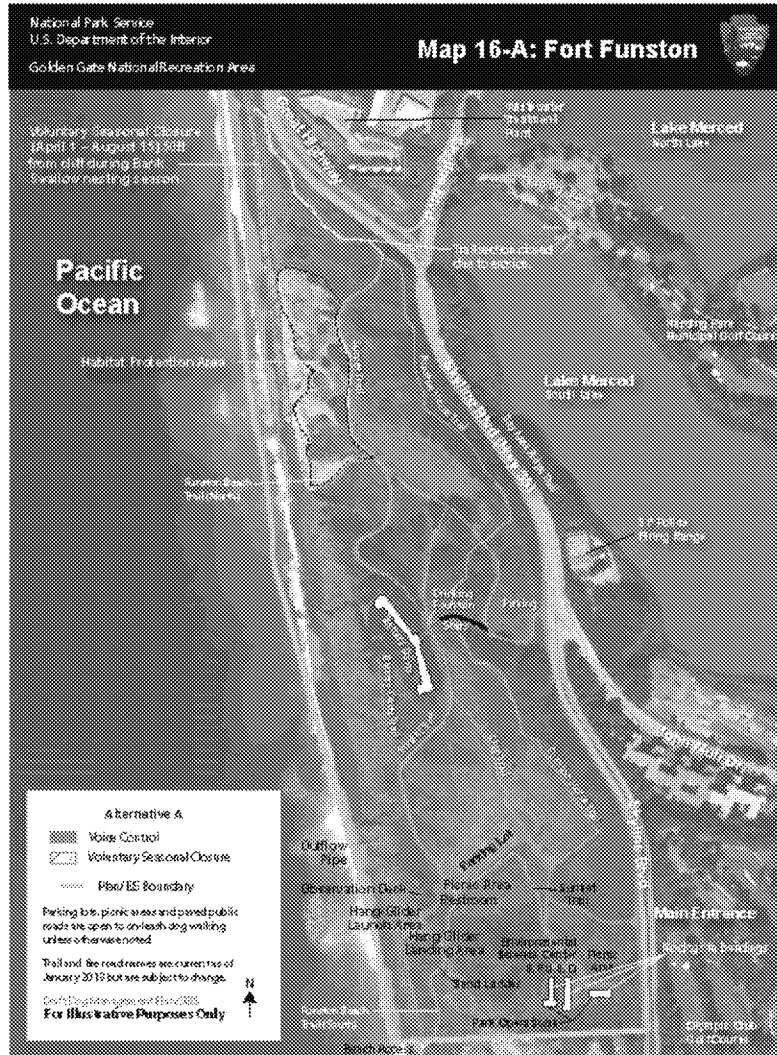
Preferred Alternative

Proposed Rule

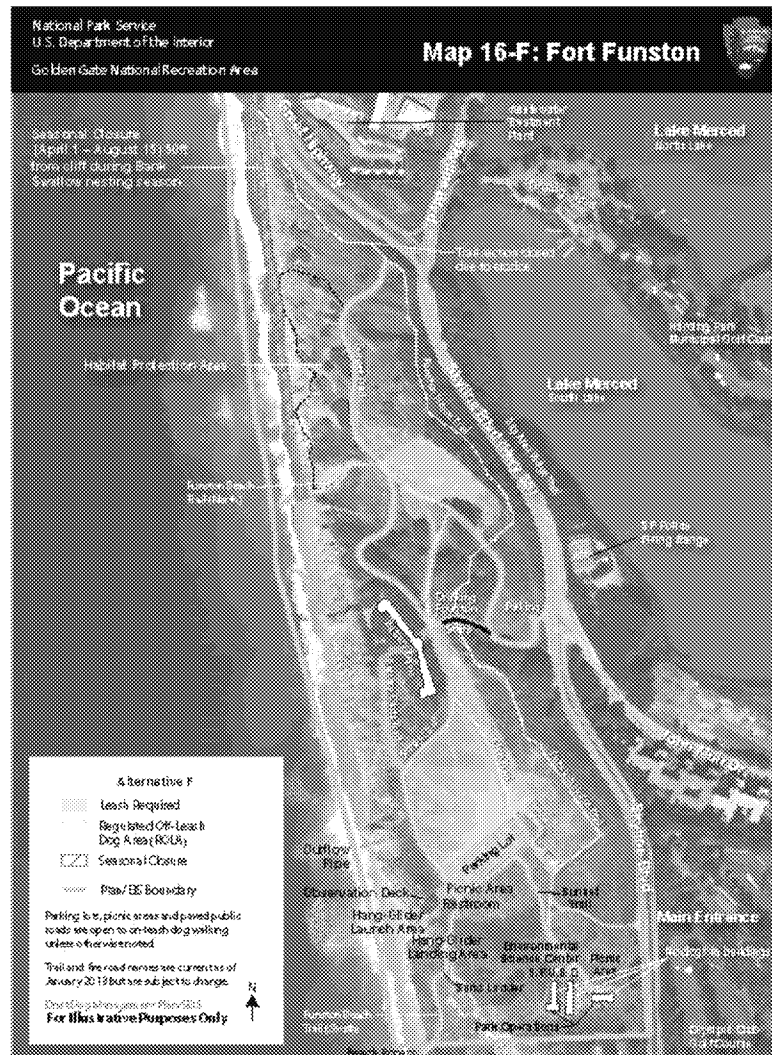


Fort Funston

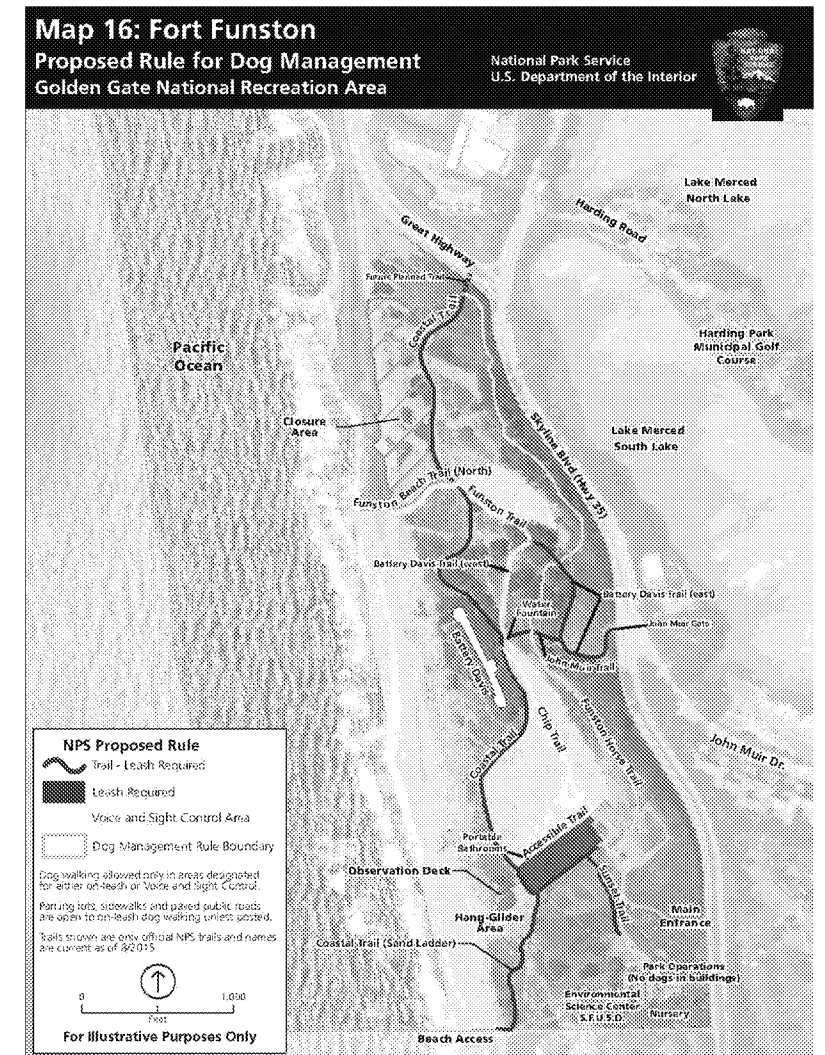
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Preferred Alternative

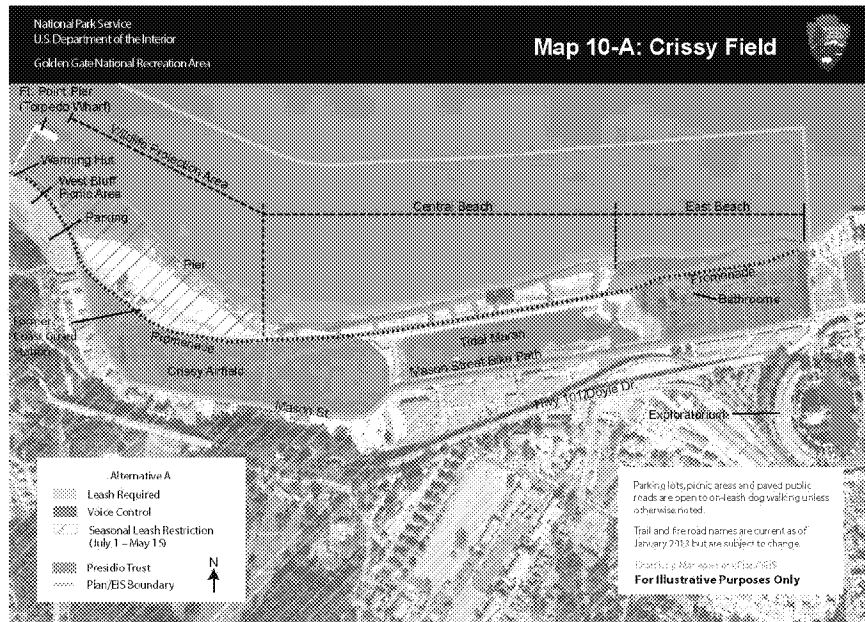


Proposed Rule

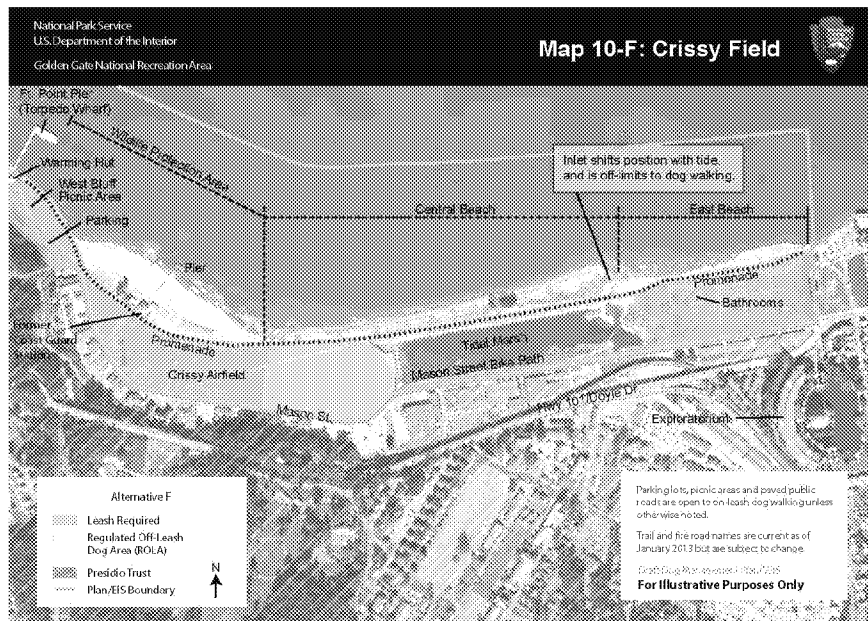


Crissy Field

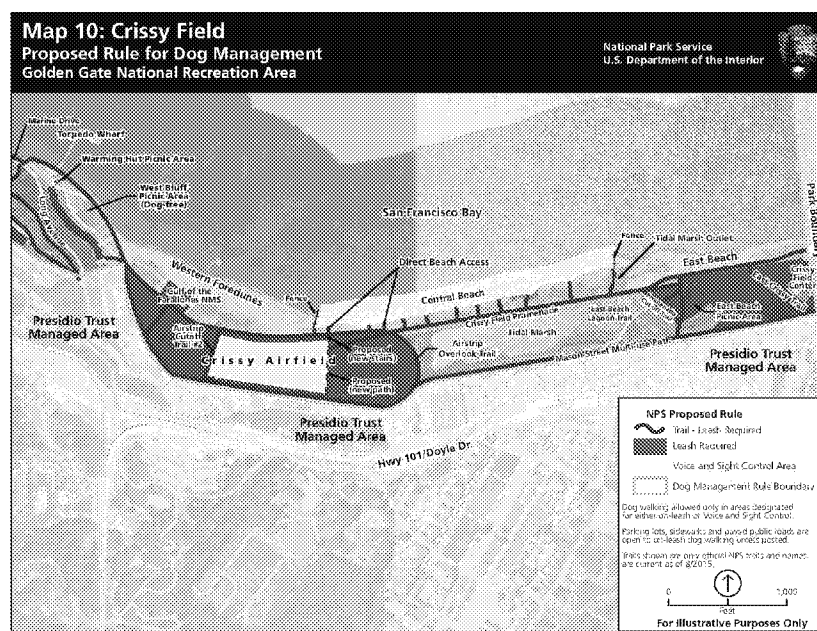
Existing Condition



Preferred Alternative



Proposed Rule



Lands End/Fort Miley

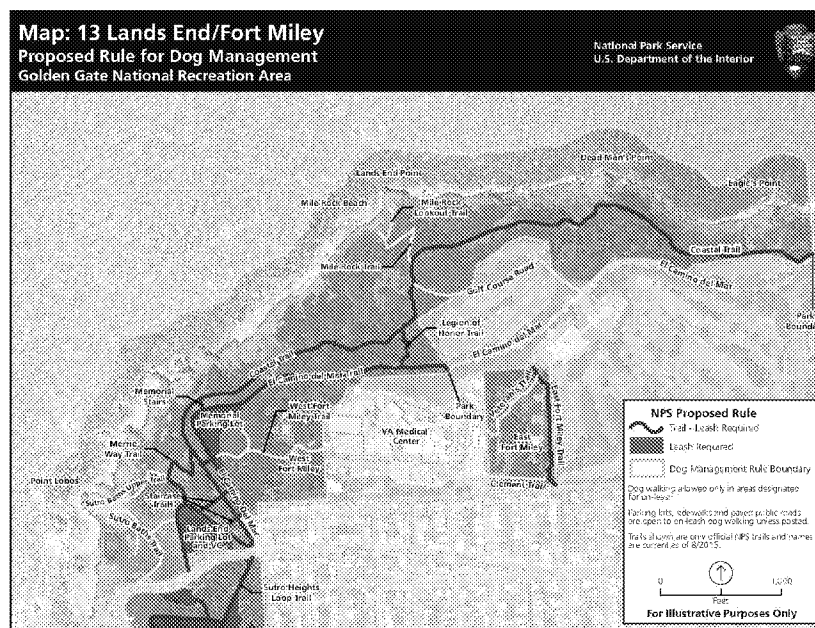
Existing Condition



Preferred Alternative



Proposed Rule



Proposed Rule for Dog Management in the GGNRA

San Mateo County Fact Sheet

Background

The [[HYPERLINK "http://www.nps.gov/goga/getinvolved/prop-rule-dog-mgt.htm"](http://www.nps.gov/goga/getinvolved/prop-rule-dog-mgt.htm)] in the Golden Gate National Recreation Area (GGNRA) is open for a 90-day public comment period through May 25, 2016. It would amend the park's special regulations designating 22 locations for dog walking in the GGNRA designating where and how people would be able to enjoy the park with their dogs – both on and off-leash – as well as places that would be dog free. The Proposed Rule allows for 14 miles of on-leash dog walking on trails (39% of total mileage) in San Mateo County over 5 park locations.

Objectives

- Better accommodate a variety of visitor experiences and reduce visitor use conflicts
- Ensure visitor and employee safety
- Preserve and protect natural and cultural resources for future generations
- Clarify rules for all visitors



General Elements

- Current rabies vaccination and county licenses required
- 'Uncontrolled dogs' and 'unattended dogs' prohibited
- Dogs under four months old must be leashed, crated, or in a carrier
- Dog excrement must be immediately picked up and disposed of
- Dog walking areas would be delineated with landscape elements, fencing, etc.
- Leashes can be no more than six feet in length
- Must have the owner's name, address, & phone number for each dog

San Mateo County locations covered in the Proposed Rule:

- Mori Point
- Milagra Ridge
- Sweeney Ridge
- Cattle Hill (if NPS assumes management)
- Rancho Corral de Tierra

Proposed Rule for Dog Management in the GGNRA

Marin County Fact Sheet

Background

The [[HYPERLINK "http://www.nps.gov/goga/getinvolved/prop-rule-dog-mgt.htm"](http://www.nps.gov/goga/getinvolved/prop-rule-dog-mgt.htm)] in the Golden Gate National Recreation Area (GGNRA) is open for a 90-day public comment period through May 25, 2016. It would amend the park's special regulations designating 22 locations for dog walking in the GGNRA designating where and how people would be able to enjoy the park with their dogs – both on and off-leash – as well as places that would be dog free. The Proposed Rule allows for 14 miles of on-leash dog walking on trails in Marin County over 8 park locations. 31% of beach mileage would also be available for dog walking, including voice and site control use in designated areas on Rodeo Beach.

Objectives

- Better accommodate a variety of visitor experiences and reduce visitor use conflicts
- Ensure visitor and employee safety
- Preserve and protect natural and cultural resources for future generations
- Clarify rules for all visitors



General Elements

- Current rabies vaccination and county licenses required
- 'Uncontrolled dogs' and 'unattended dogs' prohibited
- Dogs under four months old must be leashed, crated, or in a carrier
- Dog excrement must be immediately picked up and disposed of
- Dog walking areas would be delineated with landscape elements, fencing, etc.
- No more than six dogs could be brought into the park at any one time; walking 4-6 would require a permit.
- Leashes can be no more than six feet in length
- Must have the owner's name, address, & phone number for each dog

Marin County locations covered in the Proposed Rule:

- Stinson Beach
- Homestead Valley
- Oakwood Valley
- Alta Trail
- Fort Baker
- Marin Headlands
 - Rodeo Beach*
 - Rodeo Valley

**Voice and sight control use in designated areas*

Proposed Rule for Dog Management in the GGNRA

San Francisco County Fact Sheet

Background

The [[HYPERLINK "http://www.nps.gov/goga/getinvolved/prop-rule-dog-mgt.htm"](http://www.nps.gov/goga/getinvolved/prop-rule-dog-mgt.htm)] in the Golden Gate National Recreation Area (GGNRA) is open for a 90-day public comment period through May 25, 2016. It would amend the park's special regulations designating 22 locations for dog walking in the GGNRA designating where and how people would be able to enjoy the park with their dogs – both on and off-leash – as well as places that would be dog free. The Proposed Rule allows for 17 miles of on-leash dog walking on trails and paths (71% of total mileage) in San Francisco County over 9 park locations. 30% of beach mileage would also be available for dog walking, including voice and site control use in designated areas at Fort Mason, Crissy Field, Ocean Beach, and Fort Funston.

Objectives

- Better accommodate a variety of visitor experiences and reduce visitor use conflicts
- Ensure visitor and employee safety
- Preserve and protect natural and cultural resources for future generations
- Clarify rules for all visitors



General Elements

- Current rabies vaccination and county licenses required
- 'Uncontrolled dogs' and 'unattended dogs' prohibited
- Dogs under four months old must be leashed, crated, or in a carrier
- Dog excrement must be immediately picked up and disposed of
- Dog walking areas would be delineated with landscape elements, fencing, etc.
- No more than six dogs could be brought into the park at any one time; walking 4-6 would require a permit.
- Leashes can be no more than six feet in length
- Must have the owner's name, address, & phone number for each dog

San Francisco County locations covered in the Proposed Rule:

- Fort Mason*
- Baker Beach
- Sutro Heights Park
- Crissy Field*
- Lands End
- Ocean Beach*
- Fort Point
- Fort Miley
- Fort Funston*

**Voice and sight control use in designated areas*

Subject: Hot topics (and questions that have been submitted or come up recently) by county

Marin (from Mia)

1. **Off-leash at Muir beach:** small beach with no space for multiple dog/no dog zones and potential for health/sanitation issues; fencing lagoon alone has not been adequate protection for sensitive resources; recently restored ecosystem attracts mammals like otters and bobcats who perceive dogs as predators.
2. **Time of Use:** Not adopted as a general way to manage dog use in the park, except in case of those walking 4-6 dogs. Timed use has potential for problems such as public confusion, difficulties for enforcement, conflicts among user groups, and threats to wildlife, most active in early morning and late afternoon/early evening.
3. **Loop and backcountry trails for dog walkers:** the less developed areas are where plants and wildlife tend to be concentrated and are more susceptible to disturbances by dogs. On backcountry trails, we also want to provide contiguous natural habitat as part of preserving and protecting species subjected to fragmented habitat otherwise. Many visitors also seek an experience of relative solitude away from developed areas and that is impacted for some by presence of dogs. Also, providing options for both dog walking and dog free trails from same location make it difficult to create loop trails (eg. Oakwood Valley) especially in sensitive habitat. Where we can, we have linked park trails to community trails to provide such (eg. Homestead Valley, Rhubarb) where it did not affect resources.
4. **Off-leash and on-leash on fire roads:** as above, backcountry trails are optys for less developed experience of nature and provide contiguous habitat free from greater radius of impacts off-trails in more remote locations where enforcement may be difficult at times. [Note: The trail name changes in the preamble to proposed rule were not part of the dog mgt planning process, but part of the park's updated trail and road inventory done every few years. They are represented in the document to notify readers of those name changes. They do not change use designations in any way].
5. **Why GGNRA is managed as a national park but is called a recreation area?:** All NPS units must be managed as one system to the common benefit of all with the fundamental mandate and responsibility to "conserve in such manner and by such means as to leave them unimpaired for future generations to enjoy"; and that "when there is a conflict between conservation and use, conservation must predominate." Congress has emphasized this in no less than 3 laws directed at overarching park management. Our mission then also as a national recreation area is to "bring parks to the people" and provide a variety of visitor experiences and needed recreational open space for all in so far as it does not compromise preserving the park's outstanding values and natural setting, nor compromise protecting it from uses that would destroy its scenic beauty and natural character.
6. **What is percentage of land open to dogs, and why not more (especially considering vast amount and high demand)?**In Marin county, GGNRA proposes to provide 14 miles of trails, and overall 45 miles of trails throughout GGNRA, equating to about 1/3 of all trail mileage. And about (.58 miles or) 31% of all beaches in Marin, and 33% overall in GGNRA would be available for dog walking. Over 26% of beaches overall would be available for off-leash, voice and sight control dog walking (21% in Marin alone). While uses are not rationed according to visitation,

dog walking represents about 10-12% of total visits, and many visitors prefer to not encounter dogs either on the beach or on trails. GGNRA also has a primary responsibility and mandate to preserve and protect all of its natural habitats, especially that of sensitive species of both wildlife and plants. And dogs are perceived by wildlife as predators who are intruding in an area where wildlife should be provided refuge.

This question also poses the issue of accommodating demand. These are issues that must also be part of a regional solution with other public jurisdictions and lands. In national parks, when use exceeds ability of an area to sustain it, management actions are taken, such as reservations system at Muir Woods, not to accommodate endless use but to avoid unacceptable impacts both on its resources and visitor experience. The Monitoring and Mgt program would help us to monitor if and when mgt actions would be needed here.

7. Process perception that we're not listening (i.e. the large number of comments rec'd during past steps, public officials and highly regarded agencies telling us to do otherwise), just do what we want.

+(submitted Q)- Why do your plans drastically reduce both on and off leash dog walking areas in GGNRA despite the vote of every single local politician and 1000's of citizens against this? You are forcing dog owners to congregate in very small and crowded areas.: [last paragraph above in #6 & #7 below address this]

NPS carefully considered the input of elected officials and the general public at every stage of the dog management planning process, and has met with many of these elected officials to discuss concerns a number of times in the planning process. However, there are fundamental differences in management responsibilities between national parks and local parks. Golden Gate National Recreation Area is part of the 409-unit National Park System, and therefore has the obligation to manage and protect park resources for the benefit of the people of the entire nation for perpetuity.

It is important to appreciate that we have received public comment on all sides of the issue, and many folks are asking for greater dog management. *And this is not a vote, but an oppty to provide targeted input on how GGNRA can best meet the objectives* it must in this process of rulemaking: providing for a variety of visitor experiences, preserving and protecting park resources and reducing visitor use conflicts while ensuring the safety of visitors and employees.

8. Where is the proof that there are impacts from dogs (red-legged frogs still here!): In the SEIS, the park has documented impacts based on multiple studies. There are multiple peer reviewed studies that clearly document the impacts of dogs --- and even if not site-specific, we aren't able to ignore these studies. GGNRA must also use its professional judgement in preserving and protecting those species, especially those which are threatened and endangered, as part of the park's legal mandates. So, a primary responsibility of the park is to ensure that those species both have a refuge in the park as well as are here for future generations to enjoy.

9. GGNRA is not managing lands as intended by donors: Donors are extremely important to NPS, not in driving how we manage; rather in their recognition of the importance of our mission and their contribution to support The park welcomes their contributions in support of the mission of the park thru their support on projects and programs that align with our mission. There are

many of these that we would not have been able to accomplish without their support from Muir Beach (& Lower Redwood creek) restoration to that of Crissy Field and the special programs offered there. Donors have contributed both to restoration of the lands and to the programs that make them outstanding experiences for all.

10. **Displacement will occur on other public lands: In Marin**, GGNRA will continue to have many areas open to dog walking. As noted above in #6, 14 miles of trails in Marin, and overall 45 miles of trails throughout GGNRA, equating to about 1/3 of all trail mileage. And about (.58 miles or) 31% of all beaches in Marin, and 33% overall in GGNRA would be available for dog walking. Over 26% of beaches overall would be available for off-leash, voice and sight control dog walking (21% in Marin alone). Those seeking off-leash experiences on trails will need to find other areas for that. In Marin, there are over 90 miles of fire roads available for that now, more than any other county. The actual displacement is difficult to assess despite our attempt thru survey of dog walkers in 2013. Nevertheless, NPS assumes some displacement broadly in the region as minor to moderate in SEIS.
11. **GGNRA should be accommodating growing populations and needs:** (see #6 above)-We agree that we must continue to understand the needs of the park's visitors and look on how best to involve them in learning about and shaping the park's future within the context of our mission to preserve and protect resources, and provide for a quality visitor experience. Sometimes that means taking mgt actions to ensure that uses are not creating an unacceptable impact such as when conditions are such that increased uses are resulting in impacts to park resources and other visitors' safe experiences. [Note: 'Unacceptable impacts' mean those that individually or cumulatively, impede attainment of a desired condition for park natural and cultural resources, create an unsafe or unhealthy environment (for visitor or employees), unreasonably interfere with park or partner programs or other activities, or a tranquil atmosphere, or diminish optys for current or future generations to enjoy, learn about or be inspired by park resources and values]. A Monitoring and Mgt program will be established here with input from stakeholders to help us monitor if and when mgt actions might be needed here. Certainly, also working with a regional body like Bay Area Open Space Council and others is also important in creating regional solutions.

San Francisco

1. **Displacement: In SF**, GGNRA will continue to have many areas open to dog walking. **About 17 miles (or 71% of total) of trails and park paths in SF would be available for dog walkers, including Crissy Field paths and Ft. Mason walkways. And about 1.86 miles or 30% of all beaches in SF would be available for dog walking. [Note: Overall 45 miles of trails throughout GGNRA, equating to about 1/3 of all trail mileage, and about 1/3 of miles of beaches, would be available to dog walking with over 26% of beaches overall available for off-leash, voice and sight control dog walking].** So, actual displacement is difficult to assess, both because areas will still be available for such and because despite our attempt thru survey of dog walkers in 2013, dogwalkers themselves were unwilling or uncertain about making other choices often. Nevertheless, NPS assumes some displacement broadly in the region as minor to moderate in SEIS due to residents adjacent to the park seeking other trail venues for off-leash. When SF set their limits on commercial dog walkers in 2013, they were likewise unable to determine if any such displacement would occur. Nonetheless, the park will continue to work with neighboring jurisdictions on regional solutions.

2. **Increased conflicts will result from smaller areas for off-leash:** the park's mission is (not to provide recreation for increasing numbers of dogs off-leash but) to preserve and protect its natural habitats and biodiversity, and provide a safe, quality experience to visitors (including dog walkers). This plan balances those needs, while maintaining about 1/3 of its beaches for dog walking (26% for off-leash), and about 1/3 of its trails for dog walking. The park will monitor uses as part of an ongoing program, and take mgt action where needed to maintain a quality experience. And it will include public input on the shaping of such a program. Limiting walking of 4-6 dogs to M-F from 8am-5pm is intended to also help alleviate some of the potential for conflict from crowded conditions. If the situation so warrants it, other future mgt actions could include training to access voice and sight control areas, or limits on walking 4-6 dogs in particular areas that are crowded at a particular time. Also, perhaps, this is an area for a regional working group, like the Bay Area Open Space Council, to consider as no one agency should be responsible to solve it. And we can play a role in bringing that issue forward.

3. **(submitted Q)If one throws rubbish out their car window, they can get a hefty fine. Why do many dog owners get off scott-free, since we consider dog poop worse than normal litter?)**
 First, it is important to set a community norm along with clear rule with consequences which we want your feedback on regarding this proposed rule. Does it do that? Then, identification and reporting kicks in. We will be focusing and redoubling our enforcement efforts, and will need assistance from the broader public (both dog walking and non-dog walking community) to identify offenders and make statements to that effect(since we will not be all places all times). Finally, we will work with the Dept of Justice, who is responsible for adjudicating all violations, to both review the fee schedule and set fines for such.

4. **(submitted Q).What is the scientific evidence on which the proposed plan is based? Thus far, I've only seen and heard minor anecdotal comments.**
 Without going into all the science here, I can refer you to the SEIS on the GGNRA website and its reading room where you can look at the studies related to this issue, including several peer reviewed studies, and both its impacts on natural resources like shorebirds as well as the visiting public. A copy of the SEIS is also available here at the county stations and you can ask someone there to peruse a copy.

5. **Why is the park authorizing, and setting a precedent for, commercial dog walking in a national park?**
 The NPS is proposing to regulate commercial dog walking through issuance of special use permits. Law and National Park Service policy provide a park superintendent the discretion to allow special uses. Special use permits cannot be issued if they have unacceptable impacts on park resources and values or visitor experiences. The NPS has evaluated the impacts of dog walking allowed through special use permits (those walking 4 - 6 dogs, including commercial dog walkers) and concluded that these criteria would be met by the preferred alternative and proposed rule. The proposed rule would limit the areas, times, and degree of use by special use permittees, and monitor such use through the monitoring management program to ensure that unacceptable impacts will not occur. This rule would also be a unique special regulation to GGNRA, not at any other park unit.\

6. **Why GGNRA is managed as a national park but is called a recreation area?:** All NPS units must be managed as one system to the common benefit of all with the fundamental mandate and

responsibility to “conserve in such manner and by such means as to leave them unimpaired for future generations to enjoy”; and that “when there is a conflict between conservation and use, conservation must predominate.” Congress has emphasized this in no less than 3 laws directed at overarching park management. Our mission then also as a national recreation area is to “bring parks to the people” and provide a variety of visitor experiences and needed recreational open space for all in so far as it does not compromise preserving the park’s outstanding values and natural setting, nor compromise protecting it from uses that would destroy its scenic beauty and natural character.

7. **Why do the groups representing off-leash dog interests say that this is the single largest loss of access to GGNRA, and reduces dog access to less than 1% of the park?** Dog management planning does not affect recreation access to the park in general; it is focused on one type of use – dog walking – and seeks to provide opportunities for a variety of park users and recreational activities. While GGNRA is 80,000 acres in total, the NPS manages only 18,500 acres, including some land that is inaccessible to all visitors due to steep slopes and cliffs or dense vegetation. Of the 8.75 miles of beaches, about 2.7 miles (or 31%) would be available for dog walkers, of which 2.3 miles (over 26%) would be available for off-leash dog use. Of the 137 miles of trails addressed in our planning process, approximately 46 miles (or about 34%) will be available for dog walking.
8. **Many people feel that dogs should never be off-leash in a national park, consistent with the rules governing all of the 409 units of the National Park System. Why is off-leash dog walking being considered in GGNRA?**

Golden Gate National Recreation Area has a unique set of characteristics that support consideration of off-leash dog walking in some areas of the park:

- The park includes properties which had historically been used for off-leash dog walking
- The 1979 Citizen’s Advisory Commission Pet Policy recommended the continuation of those uses that had been in place for over 20 years
- GGNRA parkland is located immediately adjacent to one of the most densely populated urban centers in the United States, and many of the park’s visitors come from the nearby communities
- The park manages a significant portion of the public recreational open space – particularly beaches - in San Francisco and Marin Counties.

The Proposed Rule would allow for continued dog walking in the park, including off-leash dog walking in some areas, in a way that is consistent with NPS management policies and statutory mandates.

San Mateo Hot topics (from Christine):

- 1. Concern for eliminating all access to Sweeney Ridge from Pacifica**
 - Sweeney ridge trail and Baquiano are part of contiguous habitat with SFPUC watershed and other public lands with sensitive habitat and where wildlife and plants tend to be concentrated and more susceptible to disturbances by dogs. Many visitors also seek solitude away from developed spaces which is impacted for some by the presence of dogs. So, backcountry provides optys for less developed experience of nature and contiguous habitat free from impacts in more remote locations where enforcement may be difficult at times otherwise.

- 2. Monitoring and Management program - by including language that says the Superintendent has authority to make changes to the plan, feel like we are circumventing the NEPA process.**
 - The dog management plan/EIS evaluates the effects of implementing the MMS program broadly. If additional NEPA compliance is required, NPS will conduct it. Aside from NEPA, GGNRA is committed to engaging the public both in further developing MMS implementation strategies, and before any action is taken under MMS.

- 3. Disappointed to see minimal change from SEIS to Proposed Rule.**
 - We evaluated public comments carefully, and made as many changes as we could while still meeting our overall objectives. We received comments from many sides of the issue.
 - Evaluated voice and sight control areas also again; however, there were either resource concerns, public comment not wanting it near them, or inadequate options to still allow for other recreational opportunities. Prop. Rule did: add 4 trail segments in Rancho from communities; created oppty to change Sharp Park Beach designation for limited GGNRA parcel as well as authority for Supt to consider more on-leash in any new trails established after further NEPA compliance. And Pedro Point was removed from NPS consideration.

- 4. Why are there only out-and-back trails and no loops at Mori, Milagra and Sweeney?**
 - We have gained more understanding of these areas; they serve as natural habitats and a contiguous corridor for wildlife for larger and mid-size mammals as well as have densely concentrated plant species. They also serve as less developed areas for those seeking solitude in nature. More specifically, Mori with two trails that are misaligned or eroding and unmaintained, they eliminate the oppty for loops unless one circles down the south side and around the Point. The other main trail down is Lishumsha which goes thru garter snake habitat and the bootlegger's trail entails steep steps and the only dog free hike to top. At Milagra, we are seeking to protect core habitat and resources while providing multiple experiences for both dog walkers and those seeking a dog free hike within sensitive habitat. ON Sweeney Ridge, see above #1.

- 5. Why is there a 3 dog limit in San Mateo but 4-6 elsewhere?**
 - NPS lands in San Mateo are comprised mostly of a trail system where NPS does not have the coastal beaches, landscaped bay area or developed, former military sites as it does in SF and Marin counties. That managed use poses less of a threat to sensitive park resources or other private dog walkers and hikers on front country trails. Also, large groups of dogs and commercial dog walking could result in traffic and parking problems, a strong concern amongst local residents. If you think 4-6 dogs is appropriate for a site, please provide that comment; it would be especially helpful noting whether you are a San Mateo county resident and which town you reside in.

- 6. Why is San Mateo the only county without off-leash?**

7. The SEIS considered in Alternatives C and E one site for off leash use. Additional areas were considered but ultimately dismissed, see pages 93-94 of the SEIS for a detailed description of those areas. If you believe there are additional areas in San Mateo where off-leash would be appropriate, please make that comment.

8.

9. **+(submitted Q: Why can't we have a minimum of one designated "off leash" area per county** Several sites in Rancho Corral de Tierra – one near *Farallone View School in Montara*, and *others near El Granada* - were considered for off-leash use, but ultimately some were dismissed and others were not included in the preferred alternative due to *resource-related and neighboring resident concerns*. We have been working with San Mateo County Parks Department on a regional approach to addressing the local desire for more dog areas.

More detail: Sweeney Ridge, Milagra, and Mori Point were each evaluated for establishment of that use, in flat areas. Establishment of an off-leash trail here would not meet the purpose of preserving and protecting natural resources. A small off-leash area was also considered in two alternatives for Rancho Corral de Tierra (see SEIS, Table 3, Chapter 2). *An off-leash area north of the Farallone View School* was considered, but the presence of habitat of a federally threatened species, the California red legged frog, immediately adjacent to the site, eliminated this as an option since there was insufficient distance between the site and the habitat to provide a protective buffer. There also was local opposition from both neighbors and the school to such a use and the traffic, parking and associated problems it would pose. Another proposed site in a previously disturbed area west of the *intersection of Coral Reef and Sevilla Avenues* in El Granada was also considered, but was found to contain wetland plant species and to have seasonal standing water. Placing any use in this area is a violation of the intent of Director's Order 77-1, Wetland Protection. Finally, a previously disturbed site near El Granada, known as *Flat Top*, was also considered for an off-leash area. This site would have required that dog walkers keep their dogs on leash on the approximately .5 mile, steep trail connecting the neighborhood to the off-leash site. The lack of immediate access, a location removed from the site's built edge and the park's desire to ultimately restore this site, eliminated this area as a possible off-leash area. *The upland areas of the Rancho site were also removed from consideration for off-leash use*. The adjacent, publically-owned lands of McNee Ranch State Park, San Pedro Valley County Park and the San Francisco PUC watershed, together with the adjacent Rancho uplands create a large area of relatively undisturbed, contiguous habitat, particularly important for large mammals. **In order to provide the greatest protection for wildlife and habitat, dog walking on leash or off-leash were not considered for the upland portions of the Rancho site, which is consistent with regulations prohibiting dog walking in San Pedro Valley County Park and the San Francisco watershed.** Limiting dog walking, including off-leash, to the lower section of Rancho is *consistent with the goal of maintaining the integrity of the remaining, large expanses of contiguous habitat by restricting dog walking to areas near the park boundary, close to built areas and parking*.

Additionally, ***the creation of an off-leash area of significant size at Rancho would very likely increase traffic and create parking impacts in the Montara and El Granada neighborhoods drawing dog walkers from communities beyond Montara and El Granada***, similar to the draw of popular dog walking sites in San Francisco such as Crissy Field and Fort Funston.

10. **+(submitted Q: There are many trails with either none or restricted use by dogs. Why can't one trail be designated for free use of dogs? If signage is clear, anyone with an aversion to dogs would be notified and able to choose a different location for recreation.** We are trying to strike a balance with our plan and proposed rule where resource impacts are not a principal concern. So, for example, on Mori Point, there are two trail approaches, one on-leash and the other non-dogwalking trail (ie. Bootlegger Steps which are steeper). Where resource concerns predominate, like Mori Ridge trail, we

were unable to provide both and could only provide the less impactful option thru sensitive, contiguous habitat. It may be that there aren't enough, similar to loop trail issue, and that it is something the Rancho master plan needs to take up. Please insure that you make that comment and be specific about where you feel that should be better trail access for on-leash dog walking.

- 11. Reasons for restrictions to dog use seem conflicting - should be for public use as well, not just resource protection.**
 - Resource protection is primary mandate under legal mandates as natl park unit. Whenever there are conservation and use conflicts, conservation must predominate, and conservation not just for now but future uses. That said, a central objective of the plan is to reduce visitor conflict and ensure a variety of visitor experiences, including but not limited to dog walking.
- 12. There are no longer opportunities to do long runs or hikes with dogs in Pacifica.**
 - This is also a regional issue that we hope can also be addressed by the county and regional coordinating body. The Old Mori trail up to and over to coastal trail and back down around highway 1 and back to town might be one possibility.
- 13. Superintendent forum on KQED indicated that the reason we're developing this plan is to minimize conflicts between user groups. This may be necessary in busier areas of the park, but there are days we are on trails in Pacifica and never see another person. How is that a conflict with other users? Seems to apply blanket criteria to all of GGNRA, but each county is different.**
 - Appreciate that. This plan must protect resources such as garter snake, red-legged frog and Mission blue and elfin butterflies(and their habitats) and help provide a less impactful trail experience considering future uses as well as our Organic Act mandates. It also must take us thru the next 20-30 years at a minimum and set the foundation for protections beyond that as well as for increased uses. We must anticipate future visitation and uses increasing and plan for protection of resources accordingly.
- 14. No dogs are allowed in SFPUC land, San Pedro Valley County Park and other surrounding large open space areas. There are ample places for contiguous habitat, do not see why NPS has to further eliminate.**

That is our primary mandate – both through our national park service enabling legislation and GGNRA's own enabling legislation, and a responsibility of NPS to help create wildlife corridors with adjacent jurisdictions, where feasible, and bring back natural habitats that have become fragmented by use and development as one measure to maintain biodiversity and protect sensitive species.
- 15. There has not been enough information posted about these meetings. It is only targeting people who have signed up for GGNRA newsletter. Feel we should do a better job at getting this to locals who use the park, particularly by posting information about the changes (from current conditions to proposed rule) at trailheads and other locations. If federal agencies are not allowed to use NextDoor, need to develop better way to get the word out locally.**
 - Mailing list has been developed over 15 years of dog planning, and anyone interested during any of the many meetings held on the issue has been able to add their name to the list.
 - Not only constant contact which everyone can sign up for, but also thru local groups and newspapers.

Proposed Rule for Dog Management in GGNRA

Public Meetings – Staff Briefing

March 21, 2016 from 2:30-4:00 PM

Building 201, 1st Floor

Agenda

- 2:30 PM Welcome and Introductions
Kristin: Review briefing agenda; rapid fire intros
- 2:40 PM Public Meeting Flow and Roles Review
Kristin: Review roles; run through final public meeting agenda
- 2:50 PM Superintendent Presentation
Chris: Public meeting presentation; feedback from staff
- 3:20 PM Security Briefing and Questions
Chris/Chad & Team: Review security plans; questions from staff
- 3:50 PM Logistics and Reminders
Kristin: Final reminders (uniform; arrival time; contact person; changes; etc.)
- 4:00 PM Adjourn
Chris: Final words of encouragement!

San Mateo Hot topics:

- Concern for eliminating all access to Sweeney Ridge from Pacifica
 - Sweeney ridge trail and Baquiano are part of contiguous habitat with SFPUC watershed and other public lands with sensitive habitat and where wildlife and plants tend to be concentrated and more susceptible to disturbances by dogs. Many visitors also seek solitude away from developed spaces which is impacted for some by the presence of dogs. So, backcountry provides opptys for less developed experience of nature and contiguous habitat free from impacts in more remote locations where enforcement may be difficult at times otherwise.
- Monitoring and Management program - by including language that says the Superintendent has authority to make changes to the plan, feel like we are circumventing the NEPA process.
 - EIS evaluates the effects of implementing the MMS program broadly. If additional NEPA compliance is required, NPS will conduct it.
 - Aside from NEPA, GGNRA is committed to engaging the public both in further developing MMS implementation strategies, and before any action is taken under MMS.
- Disappointed to see minimal change from SEIS to Proposed Rule.
 - We evaluated public comments carefully, and made as many changes as we could while still meeting our overall objectives. We received comments from many sides of the issue.
 - Yes. SEIS laid out balanced plan to meet our objectives. Evaluated voice and sight control areas also again; however, there were either resource concerns, public comment not wanting it near them, or inadequate options. Prop. Rule did: add 4 trail segments in Rancho from communities; created oppty to change Sharp park beach designation for limited GGNRA parcel as well as authority for Supt to consider mor eon-leash in any new trails established after further NEPA compliance. It also dropped Pedro Point so that local county planning could consider that for maintaining dog walking there.
- Why are there only out-and-back trails and no loops at Mori, Milagra and Sweeney?
 - Yes, with more understanding of these areas, they serve as natural habitats and a contiguous corridor for wildlife as well as densely concentrated plant species and less developed areas for those seeking solitude in nature. More specifically, Mori with two trails that misaligned or eroding, they eliminate the oppty for loops because the other main trail Lishumsha goes thru garter snake habitat and the bootlegger's trail entails steep steps and the only dog free hike to top. At Milagra, we are seeking to protect core habitat and resources while providing multiple experiences for both dogwalkers and those seeking a dog free hike within sensitive habitat. ON Sweeney ridge, see above #1.
- Why is there a 3 dog limit in San Mateo but 4-6 elsewhere?
 - San Mateo county has an ordinance that allows only 2 dogs in each residence; so, other dogwalking for more than 3 would be for compensation. NPS does not have the coastal beaches, landscaped bay area or developed, former military sites in San Mateo that it does in SF and Marin counties where that managed use is less of a threat to park resources on front country trails or poses conflicts with private dogwalkers walking less than four dogs. Many dog walkers also seek off-leash areas which NPS lands in San Mateo, for many of same reasons, does not offer. We also did not want to open up the park in San Mateo to further large groups of dogs and commercial dog walking which could result in traffic and parking problems, one of the concerns to neighbors there.
- Why is San Mateo the only county without off-leash?
 - Off-leash areas in SF and Marin were a part of a '79 Pet policy that was practice in those counties by fed court order despite a 1983 NPS wide regulation not allowing off-leash in natl parks until we complete rulemaking. All other areas fall under that NPS wide reg 2.15 which does not allow off-leash dog walking. We did nonetheless evaluate off-leash in San Mateo(see Chapter 2 pages 93-94), and found either resource issues or concerns amongst nearby residents about increased traffic and parking there.
- Reasons for restrictions to dog use seem conflicting - should be for public use as well, not just resource protection.
 - Resource protection is primary mandate under legal mandates as natl park. Whenever there are conservation and use conflicts, conservation must predominate, and conservation not just for now but future uses.

- That said, a central objective of the plan is to reduce visitor conflict and ensure a variety of visitor experiences, not just dog walking.
- There are no longer opportunities to do long runs or hikes with dogs in Pacifica.
 - This is also a regional issue that we hope can also be addressed by the county and regional coordinating body. The Old Mori trail up to and over to coastal trail and back down around highway 1 and back to town might be one possibility.
- Superintendent forum on KQED indicated that the reason we're developing this plan is to minimize conflicts between user groups. This may be necessary in busier areas of the park, but there are days we are on trails in Pacifica and never see another person. How is that a conflict with other users? Seems to apply blanket criteria to all of GGNRA, but each county is different.
 - Appreciate that. This plan must protect resources such as garter snake, red-legged frog and Mission blue end elfin butterflies(and their habitats) and help reduce visitor conflicts where they exist now or can be anticipated in the future.as our Organic Act mandates. This plan must take us thru the next 20-30 years at a minimum and set the foundation for protections beyond that. We must anticipate future visitation and uses increasing and plan for protection of resources accordingly.
- No dogs are allowed in SFPUC land, San Pedro Valley County Park and other surrounding large open space areas. There are ample places for contiguous habitat, do not see why NPS has to further eliminate.
 - That is our primary mandate – both through our national park service enabling legislation and GGNRA's own enabling legislation, and a responsibility of NPS to help create wildlife corridors with adjacent jurisdictions, where feasible, and bring back natural habitats that have become fragmented by use and development as one measure to maintain biodiversity at the species and genetic levels.
- There has not been enough information posted about these meetings. It is only targeting people who have signed up for GGNRA newsletter. Feel we should do a better job at getting this to locals who use the park, particularly by posting information about the changes (from current conditions to proposed rule) at trailheads and other locations. If federal agencies are not allowed to use NextDoor, need to develop better way to get the word out locally.
 - Mailing list has been developed over 15 years of dog planning, and anyone interested during any of the many meetings held on the issue has been able to add their name to the list.
 - Not only constant contact which everyone can sign up for, but also thru local groups and newspapers.

Alternative Elements Eliminated from Further Consideration

Establishing a ROLA within the majority of San Mateo lands was considered but dismissed. The Cattle Hill site was evaluated for voice and sight control, but accessibility is difficult, and the public access through the area is entirely on trails that would require fencing for protection of restored areas if a ROLA was proposed for the site. The only other trail where voice and sight control is proposed is in Oakwood Valley, but to allow that use, a fence with double gates at each end would be constructed. Extensive restoration has been completed at Cattle Hill and there is habitat for the Mission Blue butterfly on Sweeney Ridge, directly adjacent to Cattle Hill, and a strong likelihood that this habitat also exists at Cattle Hill. A ROLA in this area would not meet the purpose of preserving and protecting natural resources.

Pedro Point was also evaluated for establishment of a ROLA, but the uplands portion of the property has undergone restoration, and a ROLA here would not meet the purpose of preserving and protecting natural resources. A ROLA in the uplands area also poses safety issues due to adjacent cliffs and ravines. Additionally, the park has sought to make dog management consistent with neighboring land management areas. Public land managers overseeing the Coastal Trail adjacent to Pedro Point require dogs to be on-leash, and a GGNRA on-leash option for the section of the Coastal Trail that would be within the GGNRA boundary would be consistent with neighboring management.

Sweeney Ridge, Milagra, and Mori Point were each evaluated for establishment of a ROLA, but this option was dismissed because there is endangered species habitat immediately adjacent to the trails in each of these areas. Establishment of a ROLA on the trails here would not meet the purpose of preserving and protecting natural resources.

A small ROLA, consistent with visitor and resource protection, is considered in two alternatives for Rancho Corral de Tierra (see Table 3, Chapter 2). Additional or larger ROLAs for the Rancho site were considered but dismissed due to resource-related concerns. A large ROLA north of the Farallone View School was considered, but the presence of habitat of a federally threatened species, the California red legged frog, adjacent to the site and a report from California Department of Transportation biologists that red legged frogs were found in drainages to either side of this site eliminated this as an option since a there was insufficient distance between the site and the habitat to provide a protective buffer. A proposed site in a previously disturbed area west of the intersection of Coral Reef and Sevilla Avenues in El Granada was also considered, but was found to contain wetland plant species and to have seasonal standing water. Placing any use in this area is a violation of the intent of Director's Order 77-1, Wetland Protection. In addition, habitat modeling performed in 2010 predicts a high likelihood of encountering threatened species in this area based on surrounding observations of California red-legged frogs and habitat suitability. Another previously disturbed site near El Granada, known as Flat Top, was also considered for a ROLA. This site would have required that dog walkers keep their dogs on leash on the approximately .5 mile, steep trail connecting the neighborhood to the ROLA site. The lack of immediate access, a location removed from the site's built edge and the park's desire to ultimately restore this site, eliminated this area as a possible ROLA.

The upland areas of the Rancho site were also removed from consideration for ROLA use. The adjacent, publically-owned lands of McNee Ranch State Park, San Pedro Valley County Park and the San Francisco PUC watershed, together with the adjacent Rancho uplands create a large area of relatively undisturbed, contiguous habitat, particularly important for large mammals. In order to provide the greatest protection for wildlife and habitat, dog walking on leash or in a ROLA were not considered for the upland portions of the Rancho site, which is consistent with regulations prohibiting dog walking in San Pedro Valley County Park and the San Francisco watershed. Dog walking on leash is allowed in McNee Ranch State Park, adjacent to the lower areas of Rancho where on leash dog walking and a small

ROLA are proposed in the range of alternatives. Limiting dog walking, including ROLAs, to the lower section of Rancho is consistent with the goal of maintaining the integrity of the remaining, large expanses of contiguous habitat by restricting dog walking to areas near the park boundary, close to built areas and parking.

Additionally, the creation of a ROLA of significant size at Rancho would very likely increase traffic and create parking impacts in the Montara and El Granada neighborhoods. In the coastal area from Pacifica to Half Moon Bay, there are currently only three off-leash areas: two in Pacifica – a small section of beach at the end of Esplanade Drive and the half-acre Sanchez Dog Park; one in Half Moon Bay - a small, fenced, volunteer-run site. Creation of a significantly larger ROLA at the Rancho site would be likely to draw dog walkers from communities beyond Montara and El Granada, similar to the draw of popular dog walking sites in San Francisco such as Crissy Field and Fort Funston. Local residents supporting off-leash dog walking have voiced their support for off-leash access to the Rancho site, while many residents also express strong concerns about the potential for increased traffic and visitation to the Montara and El Granada areas now that Rancho is a public, NPS-owned site.

On-leash loop trails were considered for addition at Mori Point and Milagra Ridge, however, both options were dismissed because of the potential to adversely impact natural resources. At Mori Point, the Lishumsha Trail could have provided an on-leash loop experience, but that trail crosses San Francisco garter snake habitat. At Milagra Ridge, there is mission blue butterfly habitat along the narrow trail corridor which could have provided a loop trail experience, and host plants can typically be found along trail edges. On-leash dog walking is not allowed on any narrow GGNRA trails adjacent to mission blue butterfly habitat or where trails cross any sensitive habitat.

Congress of the United States
Washington, DC 20515

March 8, 2016

The Honorable Harold Rogers
Chairman, Appropriations Committee
United States House of Representatives
Washington DC, 20515

The Honorable Nita Lowey
Ranking Member, Appropriations Committee
United States House of Representatives
Washington DC, 20515

The Honorable Ken Calvert
Chairman, Interior and Environment
Subcommittee
Appropriations Committee
United States House of Representatives
Washington DC, 20515

The Honorable Betty McCollum
Ranking Member, Interior and Environment
Subcommittee
Appropriations Committee
United States House of Representatives
Washington DC, 20515

Dear Chairman Rogers, Ranking Member Lowey, Chairman Calvert, and Ranking Member McCollum:

The Golden Gate National Recreation Area (“GGNRA”) -- the most patronized asset of the National Park Service (“NPS”), with an estimated fifteen to seventeen million visitors per year -- in the Bay Area was founded for multiple, complementary uses. This is enshrined in its mission statement -“to preserve and enhance the natural, historic and scenic resources of the lands north and south of the Golden Gate for the education, recreation and inspiration of people today and in the future.”

However, the National Park Service has proposed a severely restrictive rule (“Proposed Rule”) on an activity that many California residents and visitors enjoy immensely – the simple act of dog walking. Dog walking *off-leash* has been allowed in much of the GGNRA for the last 40+ years. The Proposed Rule would radically restrict usage, and thus, access to GGNRA. Indeed, under the NPS’ Proposed Rule, *there is no area in all of San Mateo County where people can walk their dogs off-leash.*

In a dense urban area like San Francisco and San Mateo and Marin Counties, dramatically restricting access to a beloved and much used recreation area is unacceptable. We write to ask that the Committee remove funding for the NPS’ implementation of their proposed rule on dog management (Docket ID: NPS-2016-0002) until the Secretary of the Interior satisfies the Congress that it has “utilize[d] the [GGNRA] resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management¹.”

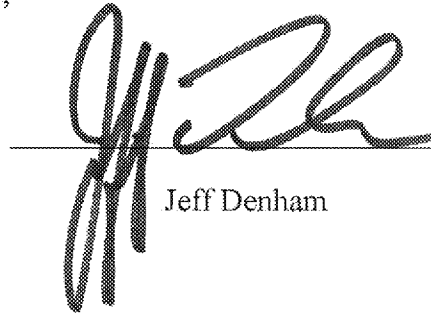
¹ 16 § 460bb: SUBCHAPTER LXXXVI-GOLDEN GATE NATIONAL RECREATION AREA

Thank you for your consideration.

Sincerely,



Jackie Speier



Jeff Denham

§ 460bb. Establishment of area; statement of purposes -- In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the recreation area, the Secretary of the Interior (hereinafter referred to as the "Secretary") shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area. (Pub.L. 92-589, § 1, Oct . 27, 1972, 86 Stat. 1299.)

DRAFT
3/3/2016

PRESIDIO TRUST

36 CFR Part 1002

Public Use Limit on Commercial Dog Walking

AGENCY: The Presidio Trust

ACTION: Proposed final rule and request for comments.

SUMMARY: The Presidio Trust (Trust) is proposing a public use limit on dog walkers who are walking four or more dogs at one time (commercial dog walkers) in Area B of the Presidio of San Francisco (Presidio or Trust-managed lands). The rule would require any such dog walker in Area B to obtain and comply with a National Park Service (NPS) permit when walking dogs in Area B of the Presidio of San Francisco (Presidio or Trust lands), and prohibit a dog walker from having more than six dogs at one time. The rule would replace the Trust interim rule regarding commercial dog walking that went into effect in October 2014 following the NPS interim public use restriction and permit requirement for commercial dog walkers that Golden Gate National Recreation Area (GGNRA) adopted in June 2014. The Trust expects to adopt the rule early next year after the effective date of the NPS proposed rule to amend its special regulations for GGNRA regarding dog walking, which would supersede the interim permit requirement.

DATES: Comments will be accepted through [60 days from FR notice].

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

Public Availability of Comments: If individuals submitting comments request that their address or other contact information be withheld from public disclosure, it will be honored to the extent allowable by law. Such requests must be stated prominently at the beginning of the comments. The Trust will make available for public inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses. Anonymous comments may not be considered.

FOR FURTHER INFORMATION CONTACT: John Pelka, Compliance Manager, Presidio Trust, 415.561.5300 or commercialdogwalking@presidiotrust.gov.

SUPPLEMENTARY INFORMATION:

Background

The 1,491-acre former U.S. Army base known as the Presidio is part of and is at the center of the GGNRA. Administrative jurisdiction over the Presidio is divided between the Trust and the NPS. The

Trust oversees the interior 1,100 acres, Area B, and the NPS oversees approximately 300 acres along the waterfront, Area A, of the national park site. Commercial dog walkers have been regularly using the Presidio for at least fifteen years. According to the most recent (2015) estimates by GGNRA, roughly 270 commercial dog walkers use the GGNRA during any given day and approximately 50 (18 percent) of these commercial dog walkers walk their dogs within Area B. Most often-used areas include the corridor adjoining West Pacific Avenue from the Broadway Gate to the 14th Avenue Gate, as well as the areas east of the Ecology Trail in the Tennessee Hollow Watershed.

Interim Permits

Under 36 CFR 1001.5, the Trust may impose reasonable public use limits in Area B, given a determination that such action is necessary to maintain public health and safety, to protect environmental or scenic values, to protect natural or cultural resources, or to avoid conflict among visitor use activities. In reaction to limits placed on commercial dog walkers in San Francisco and in partnership with the NPS, on August 19, 2014, the Trust adopted an interim rule imposing a public use limit on commercial dog walkers (currently defined as persons who are walking four or more dogs at one time in Area for consideration) (see: <https://www.gpo.gov/fdsys/pkg/FR-2014-08-19/pdf/2014-19514.pdf>). The interim rule requires any such commercial dog walker in Area B to obtain a permit from NPS. Commercial dog walkers are limited to no more than six dogs at any one time and are required to comply with the terms and conditions of the NPS permit as well as those rules and regulations otherwise applicable to Area B of the Presidio, and to visibly display their permits when engaging in commercial dog walking activities within Area B. To obtain an NPS permit, applicants must submit a business license, proof of liability insurance, and proof of successfully completing a dog-handling training course that is accepted by the NPS. The NPS commercial dog walking permit requirement is a compendium amendment for all GGNRA lands in San Francisco and Marin Counties that allow dog walking, and was implemented concurrently with the Trust's rule. Both were foreseen as interim actions to remain in place until the permit requirements would be superseded by adoption of the final GGNRA dog walking special regulation and the Trust's issuance of a final rule following public input and comment. The Trust received 31 comment letters on the interim rule, which were responded to in the Federal Register notice.

Changes to Interim Permits

On February 24, 2016, the NPS announced its proposed rule for dog management in the GGNRA that would amend its special regulations for GGNRA regarding dog walking (see: <https://www.gpo.gov/fdsys/pkg/FR-2016-02-24/pdf/2016-03731.pdf>). Comments on the NPS proposed rule are being accepted until May 25, 2016 for use in developing a final rule, which is expected later this year. Among other elements, the NPS proposed rule describes commercial dog walking opportunities and requirements, and adds restrictions for walking four to six dogs under an NPS permit. Proposed modifications to the interim public use restriction and permit requirement for commercial dog walkers include specifying areas, times and conditions under which the activity may occur. The Federal Register notice stated that the NPS proposed rule would not change the Trust's interim rule relating to commercial dog walking on Trust lands. However, under the Trust's rule, commercial dog walkers would need to comply with the new terms and conditions of an NPS dog walking permit while walking four to six dogs at one time in Area B. Principal changes to the NPS permitting program include requiring all dogs to have a current rabies vaccination and limiting times for permitted dog walking of four to six dogs

to Monday through Friday between 8 a.m. and 5 p.m. only. These restrictions would apply to areas open to commercial dog walking in Area B.

Dog Walking in Area B

To the extent not modified by the NPS proposed rule, dog walking in Area B would continue to be managed in accordance with the Trust's regulations in 36 CFR part 1001 *et seq.* adopted in 1998, which require that dogs be on-leash where dog walking is allowed. The regulation applies to all areas open to dog walking in Area B except West Pacific, which was formerly designated an off-leash "voice control" dog walking area under a 1996 compendium amendment by the NPS when Area B was under its jurisdiction (click on: [NPS 1996 Compendium Amendment.pdf](#); to be posted on Trust Web site). The Trust considers the area to be a "no-change" baseline use that would be subject to public notice and comment before taking management actions to prohibit off-leash dog walking. The maps referenced in the attachments to the 1996 compendium amendment indicating the West Pacific voice control area are available on the Trust Web site (click on: [NPS 1996 Compendium Amendment Attachments.pdf](#); to be posted on Trust Web site).

Changes to the interim rule

The Trust is amending the interim rule to eliminate the distinction between commercial dog walkers and dog walkers walking between four and six dogs at one time. The term "for consideration" is deleted from the interim rule to be consistent and improve compliance with the NPS proposed rule. Deleting the term makes clear that any dog walker walking between four and six dogs will be considered a commercial dog walker and must obtain an NPS permit. The permit display language in the rule will also be changed to more closely reflect the NPS proposed rule without changing the rule content to aid both public understanding and enforcement.

Regulatory and Environmental Compliance

Regulatory Impact: This rule will not have an annual effect of \$100 million or more on the economy nor adversely affect productivity, competition, jobs, the environment, public health or safety, or State or local or tribal governments or communities. It will not interfere with an action taken or planned by another agency or raise new legal or policy issues. In short, little or no effect on the national economy will result from adoption of the rule. Because the rule is not "economically significant," it is not subject to review by the Office of Management and Budget under Executive Order 12866 or Executive Order 13536. This rule is not a "major rule" under the Congressional review provisions of the Small Business Regulatory Enforcement Fairness Act, 5 U.S.C. 801 *et seq.*

The Trust has determined and certifies pursuant to the Regulatory Flexibility Act, 5 U.S.C. 601 *et seq.*, that this rule will not have a significant economic effect on a substantial number of small entities. This certification is based on information contained in the economic analyses found in the report entitled "Economic Analysis of the Proposed Rule for Dog Management in the Golden Gate National Recreation Area" (see link: <http://www.nps.gov/goga/getinvolved/upload/econ-prop-rule.pdf>), which takes into account commercial dog walkers operating in Area B. The analysis concludes that impacts to most commercial dog walking operations are expected to be minor (approximately \$550 per business). Revenue impacts could be substantially lower if businesses are able to adjust pricing, the number of walks, walking destination and/or the number of dog walkers used.

The Trust has determined and certifies pursuant to the Unfunded Mandates Reform Act, 2 U.S.C. 1531 *et seq.*, that this rule will not impose a cost of \$100 million or more in any given year on local, State, or tribal governments or private entities.

Environmental Impact: The NEPA, 42 U.S.C. 4321 *et seq.*, and the Trust's NEPA regulations, 36 CFR 1010.16 encourage cooperation with other governmental agencies in the preparation of environmental analyses and documentation. Furthermore, the adoption of one Federal agency's environmental document by another Federal agency is an efficiency that the Council on Environmental Quality (CEQ) regulations provide (40 CFR 1506.3). The Trust was a cooperating agency with special expertise for the GGNRA interim commercial dog walking permit requirement and for the GGNRA dog walking special regulations under the NEPA and the CEQ regulations (an agency is considered to have special expertise when it has a related "statutory responsibility, agency mission, or... program experience" (40 CFR 1508.26)). At the request of the GGNRA, the Trust participated in the development of the interim permit requirement from the outset. The Trust also submitted comments on the Draft Dog Management Plan/Environmental Impact Statement (draft EIS) (click on: *Trust Comments on NPS Dog Management Draft EIS.pdf*; to be posted on Trust Web site) and reviewed the draft Dog Management Plan/Supplemental Environmental Impact Statement (draft SEIS) to ascertain that its comments and suggestions were considered. The draft SEIS included a range of alternatives regarding commercial dog walking, including regulations requiring permits with time and place requirements (NPS proposed rule and preferred alternative) as well as the prohibition of commercial dog walking. The regulatory actions by the GGNRA and the Trust regarding commercial dog walking for Areas A and B are substantially the same. The Trust will independently review the final SEIS for adequacy under its NEPA regulations after the NPS final rule and a Record of Decision on the final SEIS has been issued. Upon concluding that the final SEIS satisfies its NEPA requirements, the Trust will adopt the final SEIS as NEPA compliance for this rule and will make it part of the administrative record of its rulemaking.

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

List of Subjects in 36 CFR Part 1002

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

For the reasons set forth in the preamble, part 1002 of Title 36 of the Code of Federal Regulations is amended as set forth below:

PART 1002—RESOURCE PROTECTION, PUBLIC USE AND RECREATION

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

Authority: 16 U.S.C. 460bb note.

- 2. Replace § 1002.6 to read as follows:

§ 1002.6 Commercial Dog Walking.

(a) The walking of more than six dogs at one time by any one person is prohibited within the area administered by the Presidio Trust.

(b) The walking of more than three dogs, with a limit of six dogs, at one time by any one person within the area administered by the Presidio Trust, where dog walking is otherwise allowed, is hereby authorized provided that:

(1) That person has a special use permit obtained from the National Park Service (NPS) for the use;

(2) The walking of more than three dogs, with a limit of six dogs, is done pursuant to the conditions of that permit; and

(3) The NPS-issued, permit identification by the permitted dog walker is displayed at all times when the permittee is walking four to six dogs within the area administered by the Presidio Trust.

Dated: March , 2016.

Andrea Andersen,

General Counsel.

Internal Deliberative-NPS

Subject: Outline of public presentation on proposed rule (15-20 minutes max)

I. GGNRA--a World class National Park unit beloved by many

- 1). Diverse ways everyone enjoys the park as a recreational experience and resource.
- 2). Richness of natural, cultural and scenic park resources

Comment [SM1]: [from birdwatching to boardsailing, mt.biking to jogging, family picnicking to dogwalking, as 1 of 37,000 volunteer stewards helping restore park's native vegetation or providing educational oppty, as a parent of over 15,000 schoolchildren learning about nature or one of the 220 teens building/maintaining trails]. **Recognize that is why they are there at that public meeting.**

II. Mission/Mandate as National Recreation Area

- 1) GGNRA enabling legislation
- 2) Natl Recreation Area same mandates as a National Park.
- 3) NPS Organic Act: leave unimpaired for 'future generations',
- 4) General Authorities Act: manage as one system to common benefit of all
- 5) Redwood Amendment: conservation must always predominate

Comment [SM2]: from the sweeping vistas along the coast to the over 100 species of WATERbirds alighting on GGNRA's beaches, marshes and lagoons, there are many park resources for all to enjoy. Though with this love of the park comes increased visitation and added responsibilities in this urban ecotone for us all to both preserve and protect those resources and ensure a quality experience can be enjoyed, not just now but also for future generations.

III. Why does GGNRA need a special rule for dog walking?

- 1) Provide variety of safe, quality recreational experiences]
- 2) Protect park resources for now and future generations to enjoy
- 3) Improve clarity about places to enjoy the park for different users
- 4) Provides regulatory bases to continue to be a dog-friendly natl park unit

Comment [EMB3]: I know the park / rec area debate, but I think would be better to state that it is a Rec Area up front, then note that it has the same mandate as a Park Unit below, folks will better understand that the mandate is the same. Otherwise people will think the mandates notes in 1-4 apply only to a park.

IV. Basic Purpose of this Proposed Rule for Dog walking

- a. Articulates the proposed regulatory elements of the SEIS preferred alternative (with changes)
- b. Modifies, and in some circumstances, relaxes the NPS-wide reg (CFR 2.15)
- c. Provides authority/tools to the Supt to avoid "unacceptable impacts."
- d. Requests specific public input on elements of the rule
(eg. permitting commercial dog walking; clarity of area/trail descriptions; definitions of uncontrolled dogs & voice and sight control; specific rules & restrictions on dog walking)

Comment [SM4]: directs us to preserve the land in its natural setting and use sound principles of land use planning and management. Acknowledges need of providing for recreational open space while reinforcing responsibility to preserve and protect from development & uses that might destroy its scenic beauty and natural character.

V. General Elements of Proposed Rule

- a. Adopts standard municipal requirements (license, rabies vaccinations, etc.)
- b. Designates 22 areas where dog walking could be enjoyed in GGNRA (ie. about 1/3 total miles of beaches and trails).
- c. Identifies seven areas in five (5) park locations for off-leash dog walking.
- d. Defines elements of program(eg. voice and sight control)
- e. Caps number of dogs brought into park by a single dog walker at six.
- f. Identifies park locations open to walking four to six dogs under an NPS permit
- g. Authorizes Supt to utilize mgt actions (eg. training, permits, etc). to improve compliance

Comment [SM5]: As part of an International Biodiversity hotspot with 37 T & E species seeking refuge in the park.

Comment [SM6]: Inability to change permanently from 1979 in SF and Marin until rule completed despite increasing visitation and use conflicts.

VI. View a representative county map from county where public mtg is held (then refer to stations): Rodeo Beach/Vicinity(in Marin); Funston(in SF); Rancho(in San Mateo).

VII. Public comments

- a. Focus on proposed rule and its specific effects on you. Not a vote
- b. Official public comments only accepted thru regulations.gov website or letter to Supt.

Comment [EMB8]: I think by saying this folks will confuse with NEPA

Comment [SM9]: This is what the fed register sites suggests when commenting on fed rules.

Internal Deliberative-NPS

II. Timeline

- | | |
|------------------------------------|--------------------------------|
| a. End of Comment on Proposed Rule | Spring 2016 (extended to 5/25) |
| b. Completion and Release of FEIS | Late Fall 2016 |
| c. Record of Decision | End of 2016 |
| d. Final Rule Published | Early 2017 |
| e. Implementation | Winter/Spring 2017 |

Subject: Draft Agenda for Dog Mgt Plan Coordination mtg.

(Thursday,3/17:10:30-12PM); Location: Chris's office.

Call-in #: 1-866-732-4230, then dial Non-Responsive

A. Interim Commercial Dogwalking (10:30-11:15)

- Trust's CDW draft rule (Katie, USPP, et al)
- LE/USPP field reports; security briefing overview (Xave; Chad/Tim)

B. Proposed Rule (11:15-11:20)

- Status of Technical Corrections (Mike)

C. Communications (11:20-12)

- Public Mtgs Plan & Stations Overview: (Howard, Kristin)
- Comms Strategy: Follow-up Actions (Howard)
- FOIA follow-up: (Howard)

Public Meeting Agenda

Meeting Objectives:

- To educate and inform the public about the Proposed Rule for Dog Management in the Golden Gate National Recreation Area.
- To provide a safe space for questions to be asked about the Proposed Rule and thoughts to be shared.
- To provide direction on how to comment on the Proposed Rule.

Agenda:

5:45 PM Doors and Information Stations Open

Doors open and participants may visit the information stations and ask NPS staff questions.

6:15 PM Formal Presentation

Format for the evening will be explained; presentation will be conducted by Superintendent Chris Lehnertz.

6:30 PM Question and Answer Period

Format for addressing questions will be reviewed; questions will be addressed by relevant NPS staff; questions submitted in advance will be interspersed with questions from audience members.

7:30 PM Information Stations Reopen

Information stations reopen; question and answer period continues if needed.

7:45 PM Closing Statement

Final question taken; closing statement from Superintendent Chris Lehnertz.

8:00 PM* Meeting Adjourned

**Time subject to change based on participation level.*

--- Agenda items and times subject to change ---

How to Ask a Question:

- In advance: Submit a question in advance at [hotlink to Google form] and it will be read at random at one of the six public meetings. Duplicate questions will be grouped together.
- At the meeting: Attend a public meeting in person and ask your question or submit your question in writing during the Q&A period. All questions must be kept to under one minute each.

Public Meetings: Staff Training Agenda

Objectives:

- Participating staff receive background information on the Proposed Rule, public meeting objectives, and their role (including key messages and materials).
- Walk through ideal meeting flow and plan; discuss potential scenarios and what to do.
- Review logistics, including location details, start/end time, uniform protocol, etc.

Agenda:

- **5 minutes: Welcome and Introduction**
 - *Names; Training Objectives; Training Agenda*
- **10 minutes: Background and Context**
 - *What is the Proposed Rule for Dog Management?; Public Meeting Objectives*
- **30 minutes: Walk Through Public Meeting Agenda and Flow**
 - *Walk staff through the flow of the meeting through the perspective of a participant; Note staff roles/tasks/talking points at each agenda item/task*
- **15 minutes: Review Scenarios**
 - *Walk through different scenarios and what to do; full security briefing will take place on the 21st*
- **20 minutes: Questions and Logistics**
 - *Review hot issues in each county. Discuss responses.*
 - *Answer final questions; review logistics one pager*

Staff Packets:

- Internal agenda
- Staff roles and descriptions
- Talking points/key messages
- Key Background Points from Pref Alternative for Park Locations
- Changes from SEIS by county & park location(internal use only)
- Meeting location layouts
- Logistics one pager:
 - Meeting dates/locations
 - Staff arrival/departure times
 - Uniform/name badge protocol
 - Emergency plan and protocols
 - Key contacts/phone numbers