

Meeting Notes

April 18, 2011

Topic: Fee Permit Options for ORV Parks

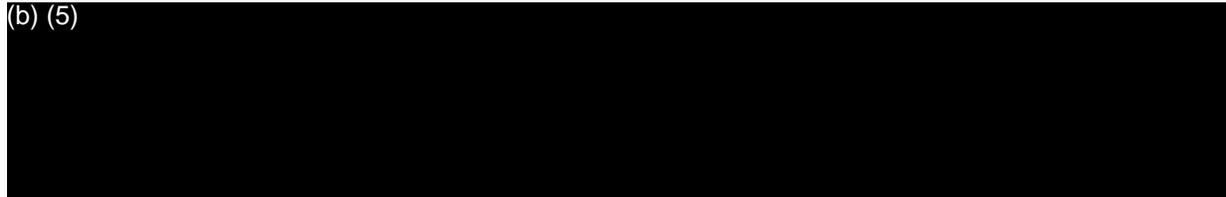
ATTENDEES:

Jane Moore, WASO Fee Program Manager
Jane Anderson, WASO Deputy Fee Manager
Carol Bennetts, Intermountain Fee Manager
Rich Devenney, Southeast Fee Manager
Lee Dickinson, Program Manager
Cindy Ott Jones, Superintendent, Lake Meredith NRA
Paul Jones, Chief Ranger, Lake Meredith NRA
Brian Carey, Deputy Superintendent, Glen Canyon NRA
Pat Kenney, Superintendent, Cape Lookout NS
Wouter Ketel, Management Assistant, Cape Lookout NS
Barry Munyan, Chief Ranger, Cape Lookout NS
Jami Hammond, Southeast Regional Environmental Coordinator
Michael Edwards, EQD Project Manager Environmental Protection Specialist
Lindsay Gillham, EQD Project Manager Environmental Protection Specialist

NOTES:

Review Objectives of the Call

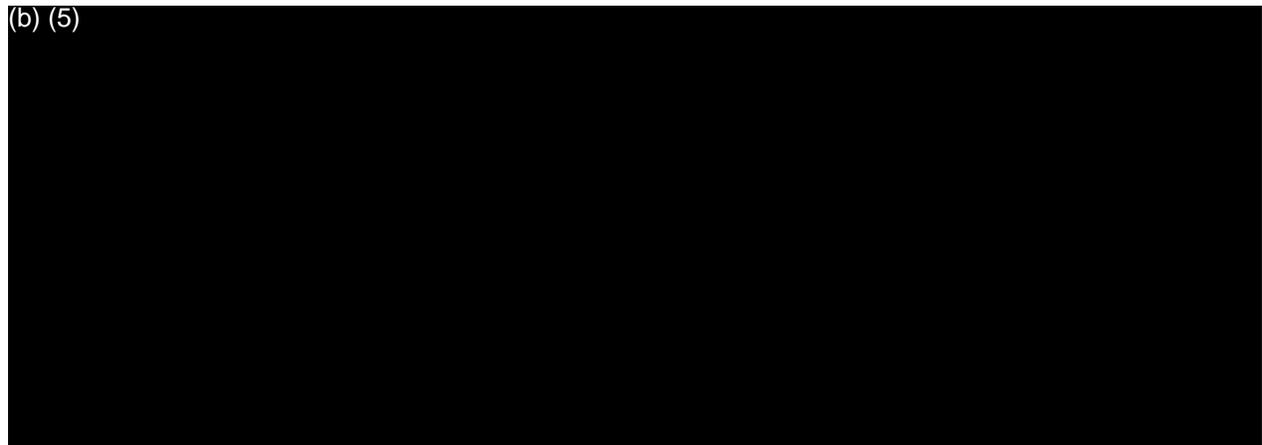
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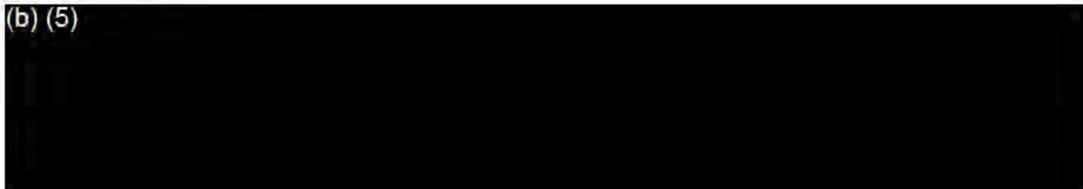


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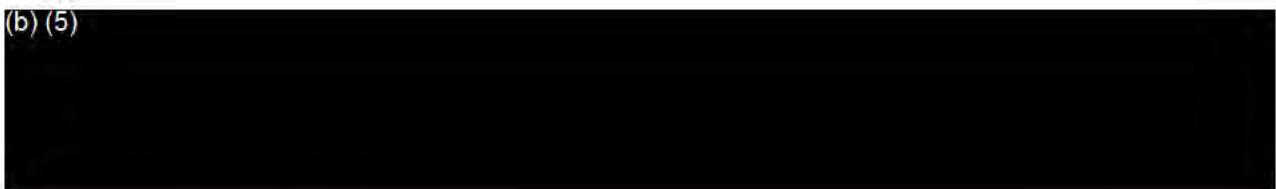
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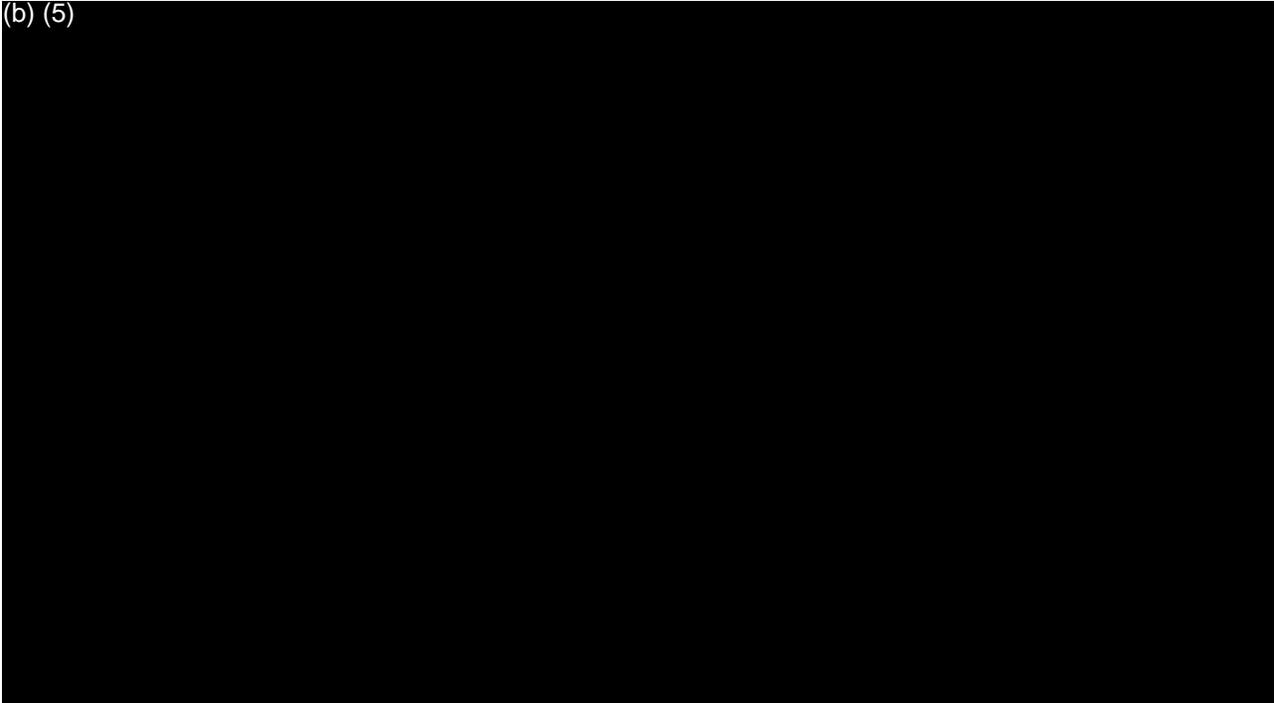
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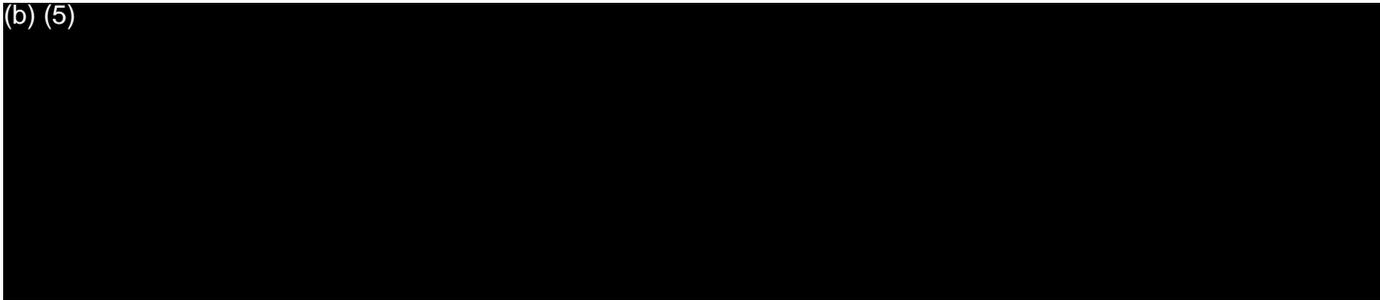
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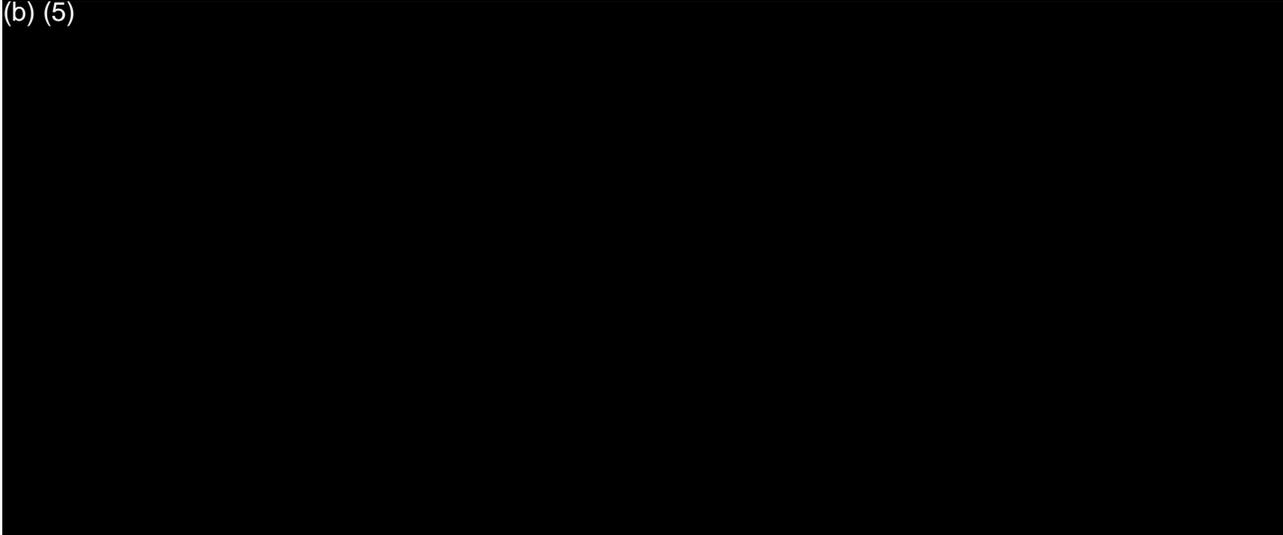
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March 11, 2009

GOGA Proposal for approach to commercial dog walking – Dog Management EIS

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February 27, 2009

UPDATE - Memo to the files re: commercial dog walking – Dog Management EIS

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February 27, 2009

UPDATE - Memo to the files re: commercial dog walking – Dog Management EIS

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Memo to files

February 25, 2010

From: Shirwin Smith

Subject: Suggested Elements of GGNRA permit program for dog walking under proposed new regulation

- Permit valid for 12 months from date of issue.
- Cost - \$100/4 dogs; \$150/5 dogs; \$200/6 dogs for cost recovery. Payment by credit card only. No refunds allowed
- Application form includes details of dog walking regs and a statement that the applicant has read and understands them, and the form must be signed.
- Require proof of training from existing training course – Marin Humane, SFSPCA etc.
- Permit design:
 - Plastic card, with photo and permit holders name/address/# of dogs
 - Have month/year that permit issued in large font - easy for LE to quickly read.
- No cap on numbers of permits – overuse to be dealt with by AM
- No specification in permit as to area/time of use – AM can address overuse
- If permit holder receives 3 violations in one calendar year, their permit will be revoked and must be surrendered to LE/USPP.
- Per SPUG Chief, this permit work load could be handled by existing staff.

Question:

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GOGA Dog Management Plan/EIS
Commercial Dogwalking
draft

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Commercial Dogwalking
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management strategy. This alternative envisions dogwalking groups (both

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GGNRA Dog Management Plan/EIS
Commercial Dogwalking
draft

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GGNRA Dog Management Plan/EIS
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draft

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- Monitor complaints, non-compliance, and impacts and report to (b) (5)

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4. If complaints ~~rise to level of unacceptable indicate anything~~
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GOGA Dog Management Plan/EIS
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GOGA Dog Management Plan/EIS
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GOGA Dog Management Plan/EIS
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- Locations where allowed: Areas of Ft. Funston, Ft. Mason, Ocean Beach,
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From: [Michael B Edwards](#)
To: [Shirwin Smith](#)
Subject: fee structure
Date: 11/03/2011 08:56 AM

Shirwin - see below info on fee structure for CAHA. This may be enough for now. They did set a range of fees but qualified it with the factors below. (b) (5)

Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRSS
303.969.2694
303.638.1928 (cell)
303-987-6782 (fax)

----- Forwarded by Michael B Edwards/WASO/NPS on 11/03/2011 09:54 AM -----

Doug Wetmore/DENVER/NPS

11/03/2011 09:04 AM

To Michael B Edwards/WASO/NPS@NPS

cc

Subject Re: CAHA question

(b) (5)

Here's the description in the FEIS:

As a cost recovery program administered under NPS Director's Order 53, the actual price of the ORV permit will be derived by determining all the additional operational costs (staffing, supplies, equipment and other non-personnel services costs), above and beyond base funded operations*, that will be necessary to administer and manage the ORV program, divided by the estimated number of permits by type (annual and 7-day) that will be sold, to determine the cost per permit by type. The costs that are above and beyond those currently covered by

base operating funds include staffing to issue permits and enforce permit requirements; additional staffing needed to implement new ORV management activities related to law enforcement, resource management, maintenance, and education outreach; ORV informational materials, signs, and supplies; and other program support costs necessary to administer and implement the plan and special regulation. The initial price will inherently involve some subjective analysis because of the uncertainties about the total number of permits and the number of permits by type that might be purchased. However, based on prices at Cape Cod (CACO) and Assateague Island (ASIS) National Seashores for similar types of permits, as a starting point it is reasonable to expect the price to be within the following range:

Annual permit: \$90 - 150 (ASIS VA & MD Day Only Permit, \$90; CACO annual ORV permit \$150)

7-day permit: 50% - 33% of the annual price (up to 50% if the annual price is lower in the price range; as low as 33% if annual price is higher in the price range)

*Base operating funds is the part of the annual appropriation from Congress for Operation of the National Park System (ONPS) which is allocated by the NPS to each park to fund salaries and other expenses such as utilities to operate the park.

Doug Wetmore
National Park Service
Natural Resource Stewardship & Science
Environmental Quality Division
P.O. Box 25287
Denver, CO 80225-0287
303.987.6955 (office)
303.968.5214 (cell)
▼ Michael B Edwards/WASO/NPS

Michael B Edwards/WASO/NPS

To Doug Wetmore/DENVER/NPS@NPS

11/03/2011 08:58 AM

cc

Subject CAHA question

Hey Doug - (b) (5)

Thanks,

Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRSS
303.969.2694
303.638.1928 (cell)
303-987-6782 (fax)

----- Forwarded by Michael B Edwards/WASO/NPS on 11/03/2011 09:54 AM -----

Doug Wetmore/DENVER/NPS

To Michael B Edwards/WASO/NPS@NPS

11/03/2011 09:43 AM

cc

Subject Re: CAHA question

If you need more info, I would talk to Mike Murray.

Doug Wetmore
National Park Service
Natural Resource Stewardship & Science
Environmental Quality Division
P.O. Box 25287
Denver, CO 80225-0287

303.987.6955 (office)

303.968.5214 (cell)

▼ Michael B Edwards/WASO/NPS

Michael B Edwards/WASO/NPS

To Doug Wetmore/DENVER/NPS@NPS

11/03/2011 08:58 AM

cc

Subject CAHA question

Hey Doug - (b) (5)



Thanks,

Michael B. Edwards

Project Manager

Environmental Protection Specialist

Environmental Quality Division, Planning & Compliance Branch

WASO-NRSS

303.969.2694

303.638.1928 (cell)

303-987-6782 (fax)

GOGA Dog Management Plan/EIS
Commercial Dogwalking
draft

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Commercial use authorizations may be issued only to authorize services that (1) are

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APPENDIX F: SPECIAL USE PERMIT

SPECIAL USE PERMIT CONDITIONS

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APPENDIX F: SPECIAL USE PERMIT

SPECIAL USE PERMIT CONDITIONS

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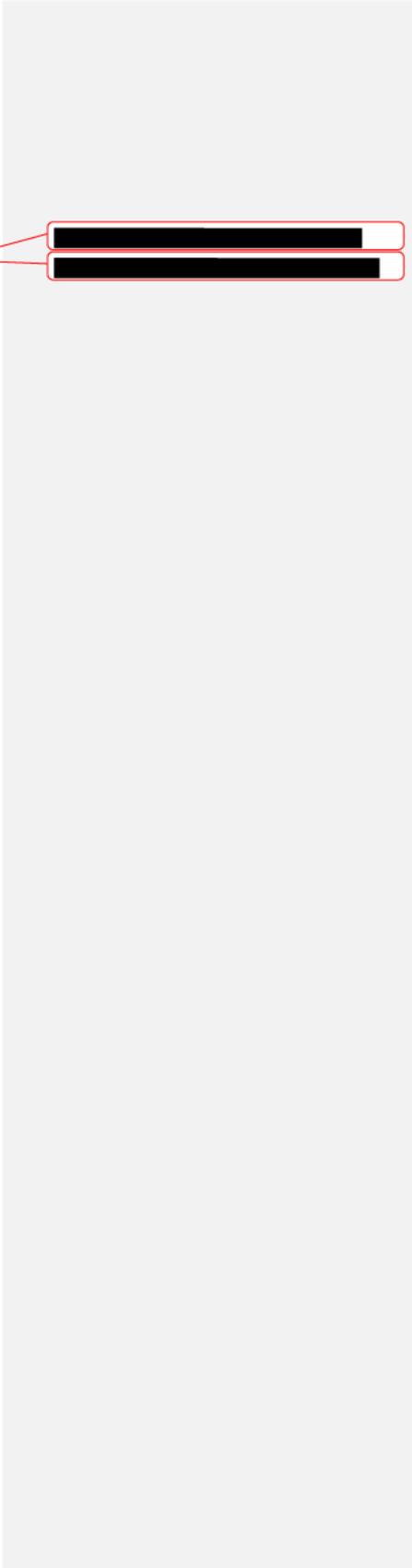


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APPENDIX F: SPECIAL USE PERMIT

SPECIAL USE PERMIT CONDITIONS

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From: [Shirwin Smith](#)
To: [Frank Dean](#)
cc: [Kevin Cochary](#); [Marybeth McFarland](#); [Howard Levitt@nps.gov](#);
[Michael B Edwards@nps.gov](#)
Subject: Re: Commercial dogwalker regulation -- ideas
Date: 06/08/2011 05:15 PM

Frank - thought I already sent you comments on this, but can't find any record of the send. So following are my thoughts in response to Supv. Weiner's concept and Kevin's responses:

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Shirwin

Shirwin Smith
Management Assistant
Golden Gate National Recreation Area
Ft. Mason, Building 201
San Francisco, CA 94123
415-561-4947 (o)

415-716-9999 (c)

▼ Frank Dean

Frank Dean To: "Michael Edwards" <Michael_B_Edwards@nps.gov>, "Shirwin Smith" <Shirwin_Smith@nps.gov>
cc: Howard Levitt/GOGA/NPS
06/08/2011 05:53 PM EDT Subject: Fw: Fw: Commercial dogwalker regulation -- ideas

Here you go- from Supervisor Weiner.

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

▼ Kevin Cochary

----- Original Message -----

From: Kevin Cochary
Sent: 06/05/2011 04:50 PM PDT
To: Frank Dean
Cc: Howard Levitt; Marybeth McFarland; Shirwin Smith
Subject: Re: Fw: Commercial dogwalker regulation -- ideas

Frank,

(b) (5)



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Kevin

▼ Frank Dean---06/03/2011 02:20:02 PM---Hi, Please don't share this, but review and give me your thoughts on feasibility and merit.

Frank Dean/GOGA/NPS

06/03/2011 02:19 PM

To Howard Levitt/GOGA/NPS@NPS, Shirwin Smith/
GOGA/NPS@NPS, Marybeth McFarland/GOGA/
NPS@NPS, Kevin Cochary/GOGA/NPS@NPS

cc

Subject Fw: Commercial dogwalker regulation -- ideas

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Thanks,

Frank Dean
General Superintendent
Golden Gate
National Recreation Area
(415) 561-4720

----- Forwarded by Frank Dean/GOGA/NPS on 06/03/2011 02:18 PM -----

Scott.Wiener@sfgov.org

To frank_dean@nps.gov

06/03/2011 02:10 PM

cc Sarah.Ballard@sfgov.org, Rebecca.Katz@sfgov.org,
Adam.Taylor@sfgov.org

Subject Commercial dogwalker regulation -- ideas

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8. Dog walkers limited to 6 dogs, except that in the following parks the
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Scott Wiener
Member, San Francisco Board of Supervisors
District 8
(415) 554-6968

*** If you would like to receive my monthly email newsletter and periodic email announcements, please email Adam Taylor (adam.taylor@sfgov.org) and request that he add you. I do not provide my email list to anyone else, and I rarely send out more than 1-2 emails a month.

***To receive more regular updates, you can follow me on Facebook by "liking" my fan page. You can also follow me on Twitter @sdwiener.

From: [Kevin Cochary](#)
To: [Frank Dean](#)
cc: [Howard Levitt](#); [Marybeth McFarland](#); [Shirwin Smith](#)
Subject: Re: Fw: Commercial dogwalker regulation -- ideas
Date: 06/05/2011 04:50 PM

Frank,

I understand the desire for consistency but have some concerns.

(b) (5)
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Kevin

▼ Frank Dean---06/03/2011 02:20:02 PM---Hi, Please don't share this, but review and give me your thoughts on feasibility and merit.

Frank Dean/GOGA/NPS

06/03/2011 02:19 PM

To Howard Levitt/GOGA/NPS@NPS, Shirwin Smith/
GOGA/NPS@NPS, Marybeth McFarland/GOGA/
NPS@NPS, Kevin Cochary/GOGA/NPS@NPS

cc

Subject Fw: Commercial dogwalker regulation -- ideas

Hi,

(b) (5)

Thanks,

Frank Dean
General Superintendent
Golden Gate
National Recreation Area
(415) 561-4720

----- Forwarded by Frank Dean/GOGA/NPS on 06/03/2011 02:18 PM -----

Scott.Wiener@sfgov.org

To frank_dean@nps.gov

06/03/2011 02:10 PM

cc Sarah.Ballard@sfgov.org, Rebecca.Katz@sfgov.org,
Adam.Taylor@sfgov.org

Subject Commercial dogwalker regulation -- ideas

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4. Applicable to commercial dog walkers who use SF city parks under the
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Scott Wiener
Member, San Francisco Board of Supervisors
District 8
(415) 554-6968

***If you would like to receive my monthly email newsletter and periodic email announcements, please email Adam Taylor (adam.taylor@sfgov.org) and request that he add you. I do not provide my email list to anyone else, and I rarely send out more than 1-2 emails a month.

***To receive more regular updates, you can follow me on Facebook by "liking" my fan page. You can also follow me on Twitter @sdwiener.

From: [Michael B Edwards](#)
To: [Shirwin Smith](#)
Subject: Re: Fw: dog plan SUP info
Date: 01/17/2012 02:29 PM
Attachments: [SOL OPINION - Commercial Dog Memo Drf 2009 3 27.doc](#)
[Appendix F DEIS January 2011.pdf](#)

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Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRSS
303.969.2694
303.638.1928 (cell)
303-987-6782 (fax)

▼ Shirwin Smith---01/17/2012 03:16:05 PM---Did we ever touch base with Lee D. about OMB clearance? Don't recall doing so.

Shirwin Smith/GOGA/NPS

01/17/2012 03:16 PM

To Michael_B_Edwards@nps.gov

cc

Subject Fw: dog plan SUP info

(b) (5)

----- Forwarded by Shirwin Smith/GOGA/NPS on 01/17/2012 02:15 PM -----

Michael B Edwards/WASO/NPS

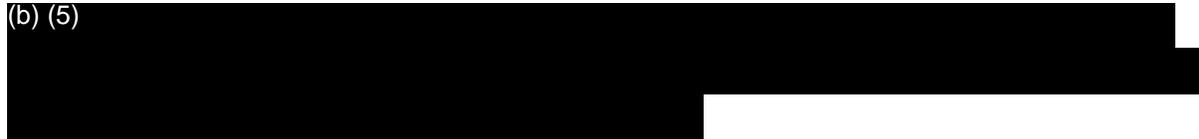
10/31/2011 01:49 PM

To Shirwin Smith/GOGA/NPS@NPS

cc

Subject Re: Fw: dog plan SUP info

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Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRSS
303.969.2694
303.638.1928 (cell)
303-987-6782 (fax)

▼ Shirwin Smith---10/31/2011 02:31:09 PM---Ever get a response to this?

Shirwin Smith/GOGA/NPS

10/31/2011 02:31 PM

To Michael_B_Edwards@nps.gov

cc

Subject Fw: dog plan SUP info

Ever get a response to this?

----- Forwarded by Shirwin Smith/GOGA/NPS on 10/31/2011 01:30 PM -----

Michael B Edwards/WASO/NPS

04/25/2011 08:31 AM

To AJ North/WASO/NPS@NPS

cc Shirwin Smith/GOGA/NPS@NPS

Subject dog plan SUP info

Hi AJ,

Attached is the draft SOL memo regarding SUPs for commercial dogwalking. Also, attached is the SUP language for SUPs in the dog mgmt plan/EIS (See Appendix F).

If you could confirm that we will or will not need an additional OMB clearance for the information collected here, that would be great.

Thanks very much!



SOL OPINION - Commercial Dog Memo_Drf_2009_3_27.doc



Appendix F_DEIS_January_2011.pdf

Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRPC
303.969.2694
303.638.1928 (cell)
303-987-6782 (fax)

From: [Michael B Edwards](#)
To: [Shirwin Smith](#)
Subject: Re: SUP
Date: 10/21/2011 12:31 PM
Attachments: [4.18.2011 Final Notes from Fee Call.docx](#)

Most ORV parks are providing a range of fees, some more specific than others. (b) (5)



4.18.2011 Final Notes from Fee Call.docx

Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRSS
303.969.2694
303.638.1928 (cell)
303-987-6782 (fax)

▼ [Shirwin Smith---10/21/2011 01:25:03 PM---How are the ORVs being developed? Shirwin Smith](#)

Shirwin Smith/GOGA/NPS

To Michael B Edwards/WASO/NPS@NPS

10/21/2011 01:25 PM

cc

Subject Re: SUP

How are the ORVs being developed?

Shirwin Smith
Management Assistant
Golden Gate National Recreation Area
Ft. Mason, Building 201

San Francisco, CA 94123
415-561-4947 (o)
415-716-9999 (c)

▼ Michael B Edwards/WASO/NPS

Michael B Edwards/WASO/NPS

To Shirwin Smith/GOGA/NPS@NPS

10/17/2011 12:44 PM

cc

Subject SUP

(b) (5)



Michael B. Edwards
Project Manager
Environmental Protection Specialist
Environmental Quality Division, Planning & Compliance Branch
WASO-NRSS
303.969.2694
303.638.1928 (cell)
303-987-6782 (fax)

Memo to files

March 24, 2010

From: Shirwin Smith

Subject: Suggested elements of permit program for dog walking under proposed new regulation, with commercial dog walking guidelines from Reg Neg committee added.

- Permit valid for 12 months from date of issue.
- Cost - \$100/4 dogs; \$150/5 dogs; \$200/6 dogs for cost recovery. Payment by credit card only. No refunds allowed
- Application form includes details of dog walking regs and a statement that the applicant has read and understands them, and the form must be signed.
- Permit design:
 - Plastic card, with photo and permit holders name/address/# of dogs
 - Have month/year that permit issued in large font - easy for LE to quickly read.
- No cap on numbers of permits – overuse to be dealt with by AM
- No specification in permit as to area/time of use – AM can address overuse
- If permit holder receives 3 violations in one calendar year, their permit will be revoked and must be surrendered to LE/USPP.
- Require proof of training from existing training course – Marin Humane, SFSPCA etc.

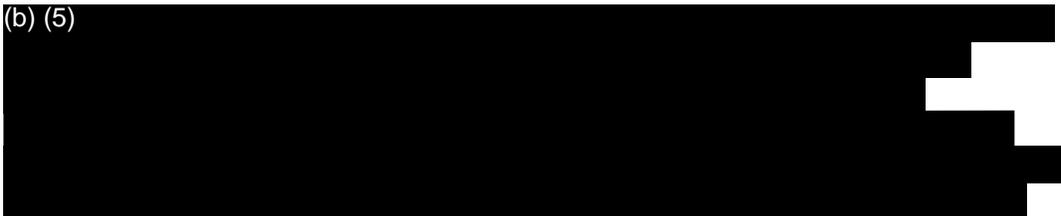
Permit requirements from reg neg not already included in permit or dog walking regs:

- Dog walker must pickup dog waste for all dogs in their care.
- Dog walkers will be limited to the number of dogs allowed by the county that the GGNRA land abuts, i.e. Marin county 6 dogs; San Francisco county 6-8 dogs; etc. If the county does not have a limit, the default limit will be 6 dogs.
- Dog walkers must abide by all GGNRA rules regarding dogs while on GGNRA lands

Not considered by park at this time.

- Dog walkers will carry a liability insurance policy for \$1 million. Proof of policy must be shown to acquire permit.
- Dog walkers will be able to use the GGNRA lands from 8 am to 5 pm Monday though Friday. Saturday and Sunday. Professional Dog walkers will be not allowed in the GGNRA lands from 11 am to 3 pm.
- Having more then the allowed number of dogs will result in a fine for every dog over the limit. Second offense will result in a doubling of the fine, per dog. Third offense will result in suspension of dog walkers' permit for up to three months.

Question:

- (b) (5)
- 

(b) (5)



DRAFT

Memo to files

April 7, 2010

From: Shirwin Smith

Subject: Proposed elements of permit program for Dog Management EIS

(b) (5) [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

DRAFT

- (b) (5) [Redacted]

[Redacted]

GOGA Final Alternatives – by county – North to South

Revised March 20, 2009

Golden Gate National Recreation Area Dog Management Plan / EIS

[REDACTED]	(b) (5) [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(b) (5) [REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Memo to files

February 24, 2010

From: Shirwin Smith

Subject: Suggested Elements of permit program for dog walking under proposed new regulation

- Permit valid for 12 months from date of issue.
- Cost - \$100/4 dogs; \$150/5 dogs; \$200/6 dogs for cost recovery. Payment by credit card only. No refunds allowed
- Application form includes details of dog walking regs and a statement that the applicant has read and understands them, and the form must be signed.
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- Permit design:
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 - Have month/year that permit issued in large font - easy for LE to quickly read.
- No cap on numbers of permits – overuse to be dealt with by AM
- No specification in permit as to area/time of use – AM can address overuse
- If permit holder receives 3 violations in one calendar year, their permit will be revoked and must be surrendered to LE/USPP.
- Per SPUG Chief, this permit work load could be handled by existing staff.

Question:

- (b) (5)



Memo to files

March 8, 2010

From: Shirwin Smith

Subject: Suggested Elements of permit program for dog walking under proposed new regulation, with commercial dog walking guidelines from Reg Neg committee added.

- Permit valid for 12 months from date of issue.
- Cost - \$100/4 dogs; \$150/5 dogs; \$200/6 dogs for cost recovery. Payment by credit card only. No refunds allowed
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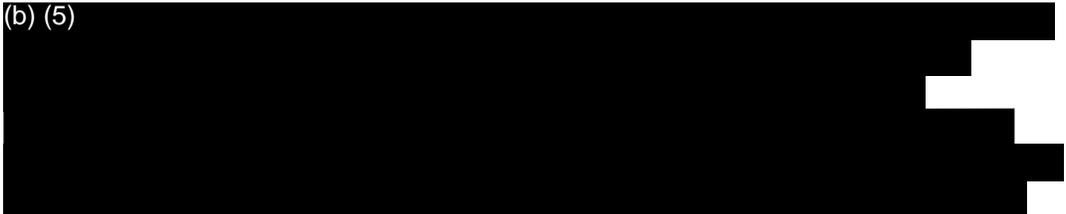
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- Having more then the allowed number of dogs will result in a fine for every dog over the limit. Second offense will result in a doubling of the fine, per dog. Third offense will result in suspension of dog walkers' permit for up to three months.

Question:

- (b) (5)
- 

(b) (5)



**Summary of Approaches for Regulation of Commercial Dogwalking in GGNRA
September 29, 2008**

Commercial Use Authority

- (b) (5) [Redacted]
- [Redacted]
- [Redacted]

Special Recreation Permit

- (b) (5) [Redacted]
- [Redacted]

Special Use Permit

- (b) (5) [Redacted]
- [Redacted]
- [Redacted]

1. From Federal Lands Recreation Enhancement Act (FLREA) Handbook:

Sec. 3 Recreation fee authority: 3(h) *Special Recreation Permit Fee* --The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, motorized recreational vehicle use. Definition: Section 3(h)*Special Recreation Permit Fees (SRP)*: SRPs are authorizations which allow specified recreational use of the public lands and related waters. They are issued to: Control visitor use; Protect recreational, natural, and cultural resources; and Provide for the health and safety of visitors. SRPs are also a mechanism to authorize: Commercial and vending use; Competitive events; Organized group activities and events; and Individual or group use of special areas.

**Summary of Approaches for Regulation of Commercial Dogwalking in GGNRA
September 29, 2008**

(b) (5)

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■ From Federal Lands Recreation Enhancement Act (FLREA) Handbook:

Sec 3 Recreation fee authority: 3(h) *Special Recreation Permit Fee* --The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, motorized recreational vehicle use. Definition: Section 3(h)*Special Recreation Permit Fees (SRP)*: SRPs are authorizations which allow specified recreational use of the public lands and related waters. They are issued to: Control visitor use; Protect recreational, natural, and cultural resources; and Provide for the health and safety of visitors. SRPs are also a mechanism to authorize: Commercial and vending use; Competitive events; Organized group activities and events; and Individual or group use of special areas



PRESIDIO TRUST PROJECT SCREENING FORM

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

(To be completed by N² Division only)

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

NHPA / **NEPA**

PART I

A. GENERAL INFORMATION

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

B. PURPOSE AND NEED

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

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

C. WORK PLAN SPECIFICS

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

The limitation will go into effect no later than July 1, 2013, the latest operative date of the City's Commercial Dog Walking ordinance. Permittees will be obliged to carry his or her permit while walking dogs and produce the permit for inspection upon request by U.S. Park Police. Anyone violating the limitation could face punishment as provided by law. Prior to implementation, the Trust will conduct a public outreach and education campaign to alert commercial dog walkers and others about the use limitation. The Trust will also post signs and provide handouts to notify park users of the restriction in areas where dog walking is a high-use activity.

D. PROJECT COORDINATION

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<i>If unknown, consult the Design Review Committee Coordinator at 561-5367</i>	

E. ALTERNATIVES CONSIDERED

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

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

PRESIDIO TRUST PROJECT SCREENING FORM

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

F. CONSULTATION

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

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

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

PART II

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

If implemented, could the project:

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

PRESIDIO TRUST PROJECT SCREENING FORM

Explain:

5.	Substantially alter any ground cover or vegetation and/or diminish habitat? Affect an endangered, rare or threatened species?.....	No
<p><i>Explain:</i> The public use limit on commercial dog walking would encourage responsible dog management, which would reduce impacts to soils and vegetation caused through physical damage (such as trampling, digging, and dog waste). Impacts to wildlife (due to barking and chasing) and associated habitat within easily accessible off trail areas, such as east of the Ecology Trail, would also be reduced. Exclusionary fencing prohibits access by dogs in areas with sensitive habitat or endangered or threatened species in Area B.</p>		
6.	Attract animal or insect pests?	No
<p><i>Explain:</i></p>		
7.	Inhibit surface water drainage, alter the landscape topography, lead to increased runoff or erosion or compromise slope stability?	No
<p><i>Explain:</i> The public use limit on commercial dog walking would improve dog behavior, which would reduce impacts on soils (trampled vegetation and soil erosion) due to overuse in popular areas, such as lower West Pacific and the Ecology Trail.</p>		
8.	Involve handling and/or storage of hazardous substances?	No
<p><i>Explain:</i></p>		
9.	Degrade surface or ground water quality? Substantially alter the type of wastewater generated to the sanitary sewer system or storm drainage?	No
<p><i>Explain:</i> The public use limit on commercial dog walking would require commercial dog walkers to comply with applicable rules and regulations, including removing dog waste, which would decrease the potential for nutrients and pathogens from to enter water bodies (such as Mountain Lake from dog activity along West Pacific).</p>		
10.	Affect wetland, riparian or coastal habitat?	No
<p><i>Explain:</i> The public use limit on commercial dog walking would promote appropriate dog behavior and pack management, which would discourage dogs from entering wetland areas that are not otherwise fenced in Area B.</p>		
11.	Be inconsistent with existing or formally proposed land use plans or policies (i.e. the Presidio Trust Management Plan and Mitigation Monitoring Enforcement Program, Vegetation Management Plan etc.)?	No
<p><i>If unknown, consult the Environmental Protection Specialist</i></p>		

PRESIDIO TRUST PROJECT SCREENING FORM

Explain:

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

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

12.	Impact current or planned visitor services? Alter current visitor access (parking, trails, roads, etc.)?	No
<i>Explain:</i> The public use limit on commercial dog walking would improve dog behavior to the benefit of other users. Conflicts would be reduced in areas where there currently are a high concentration of dog walkers among other visitors who engage in a variety of activities, such as the Ecology Trail and the West Pacific Trail.		
13.	Greatly increase the demand for parking?	No
<i>Explain:</i>		
14.	Substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians and bicyclists?.....	No
<i>Explain:</i>		
15.	Substantially increase vehicle emissions or emissions of other air pollutants? Generate nuisance dust or odors?	No
<i>Explain:</i>		
16.	Perceptibly increase the background noise levels or expose people to loud noise?	No
<i>Explain:</i>		
17.	Substantially increase the amount of energy or water used? Use sustainable materials and/or appliances designated in the Presidio Green Building Guidelines?.....	No
<i>Explain:</i>		
18.	Substantially increase the amount of waste generated?	No
<i>Explain:</i>		
19.	Increase light or glare?.....	No
<i>Explain:</i>		

PRESIDIO TRUST PROJECT SCREENING FORM

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

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

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

Comments, Questions and Suggestions:

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



COMMERCIAL DOG WALKING PERMIT REQUIREMENT

August 2013

INTRODUCTION

The National Park Service, Golden Gate National Recreation Area (GGNRA) is considering a (b) (5)

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Purpose of the Proposed Action

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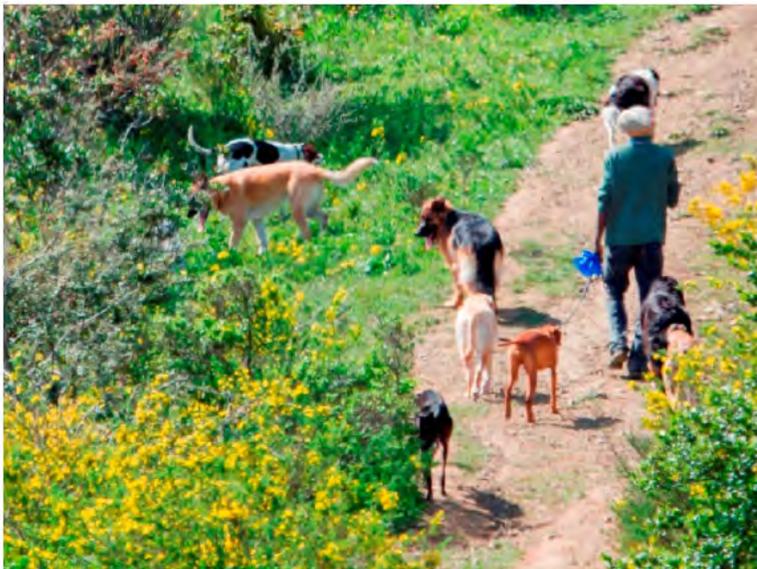
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Need for the Proposed Action

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Visitor Experience and Safety

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NEXT STEPS

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COMPENDIUM AMENDMENT

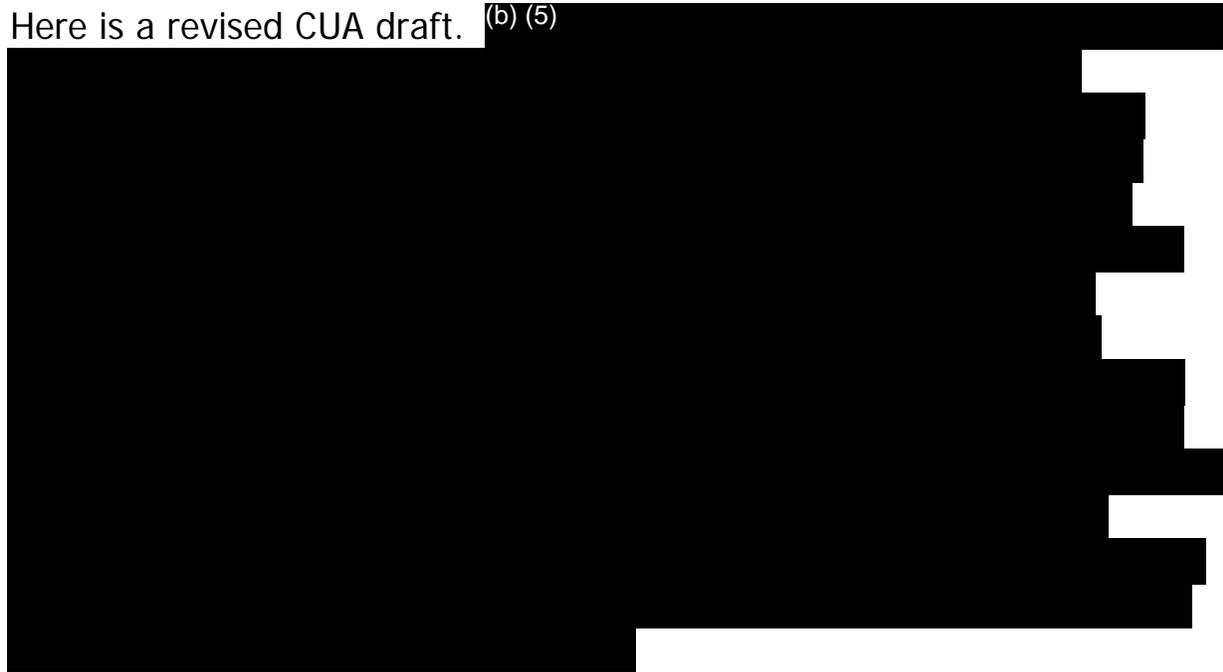
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[REDACTED]

From: [Michael B Edwards](#)
To: [Chris Powell](#); [Shirwin Smith](#)
cc: [Aaron Roth](#)
Subject: Commercial dogwalking revisions
Date: 08/22/2008 09:26 AM
Attachments: [EQD Commercial dogwalking draft - RD briefing response 8.22.08.doc](#)

Chris, Shirwin,

Here is a revised CUA draft. (b) (5)



Let me know what you think. Thanks.

Draft November 6, 2013
COMPENDIUM AMENDMENT

(b) (5) [Redacted]



United States Department of the Interior

NATIONAL PARK SERVICE

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

IN REPLY REFER TO

C3827(GOGA-BMD)

January 1, 2013

Dear Prospective Permittee:

In response to the recent ordinances limiting the number of dogs allowed per commercial

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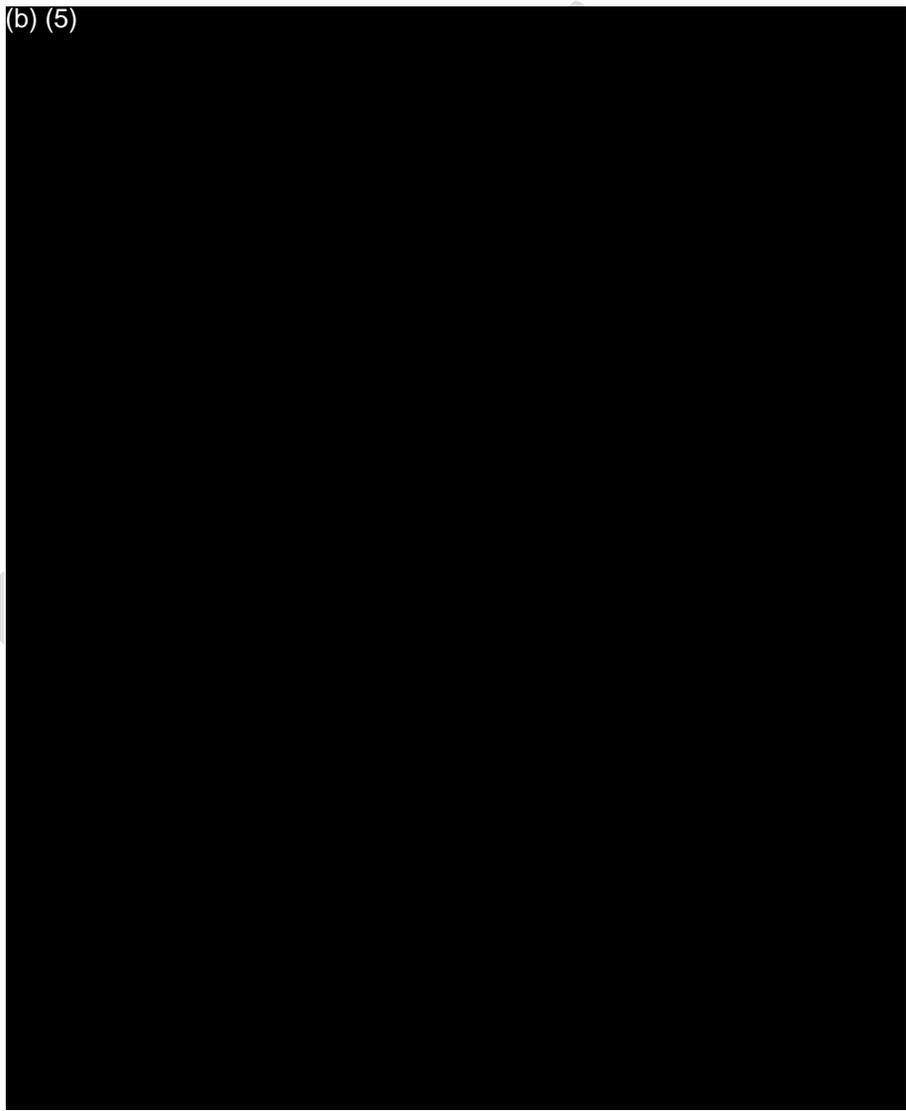
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United States Department of the Interior

NATIONAL PARK SERVICE

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

IN REPLY REFER TO

C3827(GOGA-BMD)

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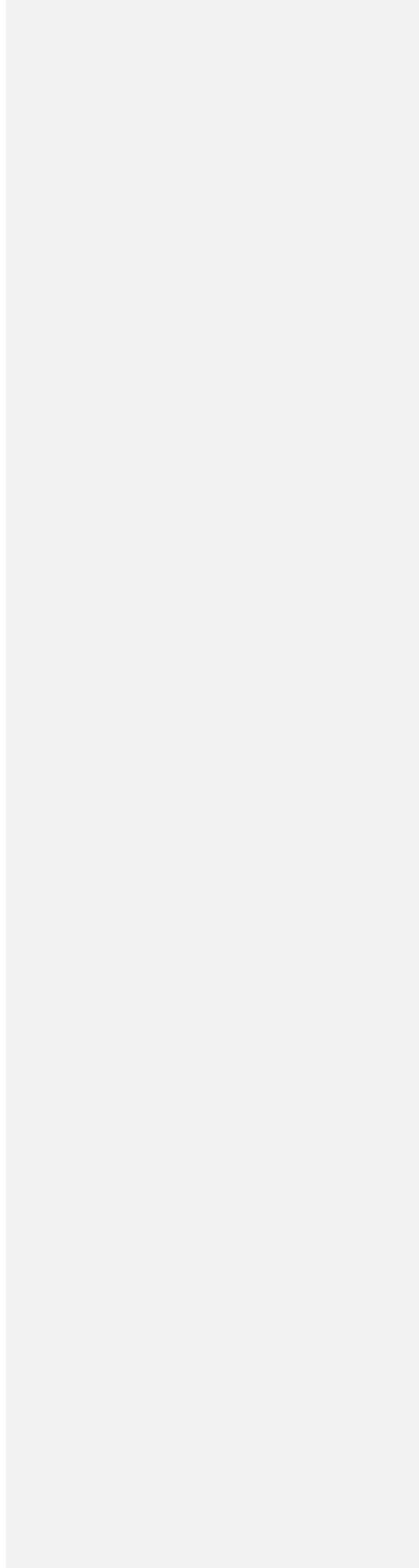
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United States Department of the Interior

NATIONAL PARK SERVICE

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

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United States Department of the Interior

NATIONAL PARK SERVICE

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

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United States Department of the Interior

NATIONAL PARK SERVICE

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

IN REPLY REFER TO

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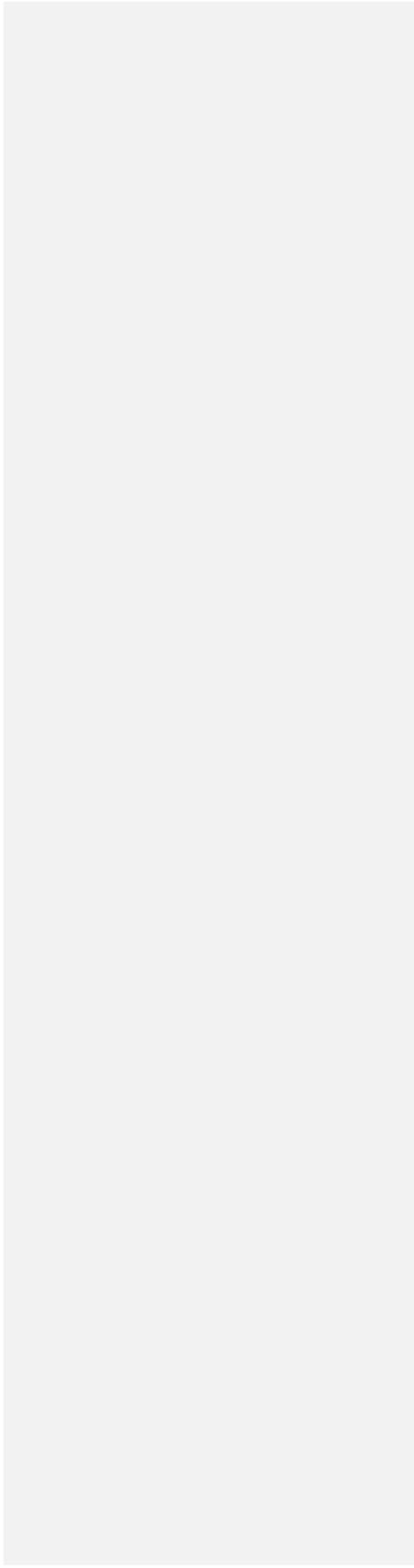
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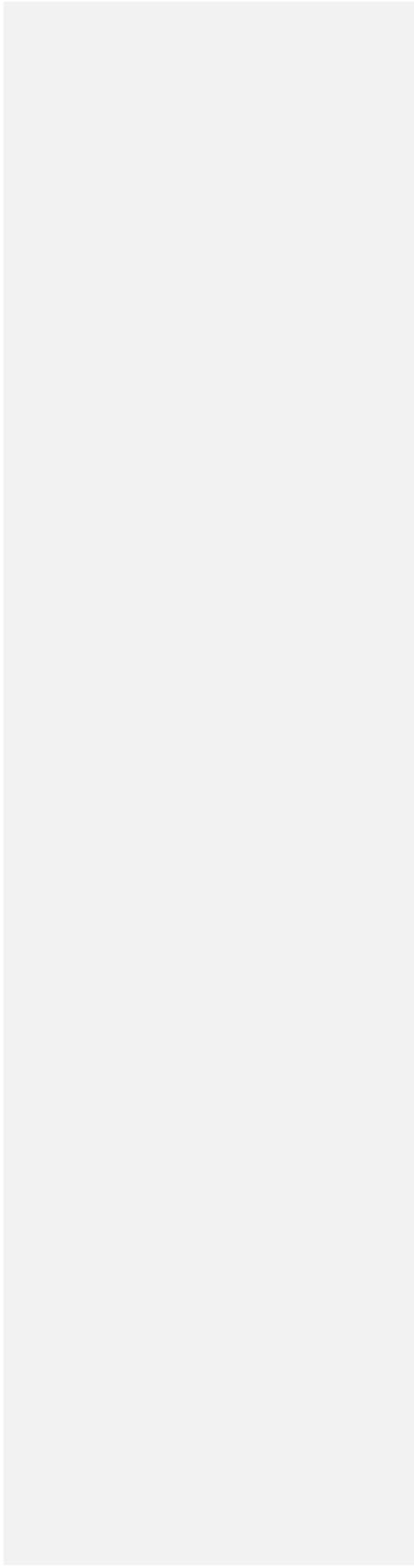
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Commercial Dog Walking Interim Permit Requirement Proposal

August 2013

INTRODUCTION

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Purpose of the Proposed Action

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Need for the Proposed Action

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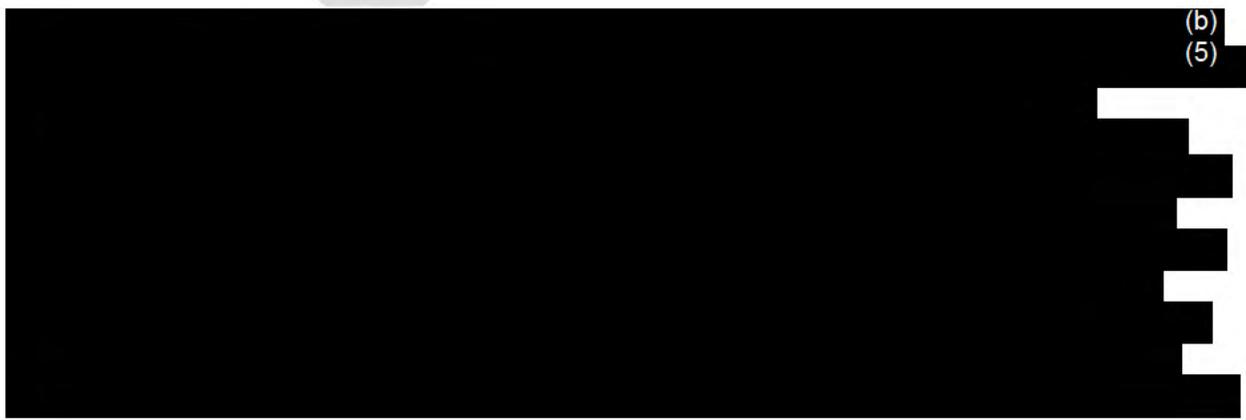


Visitor Experience and Safety

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NEXT STEPS

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DRAFT – NOT FOR PUBLIC DISTRIBUTION

GOLDEN GATE NATIONAL RECREATION AREA

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**Interim
Commercial Dog Walking
Public Use Limit
and
Permit System** (b) (5)

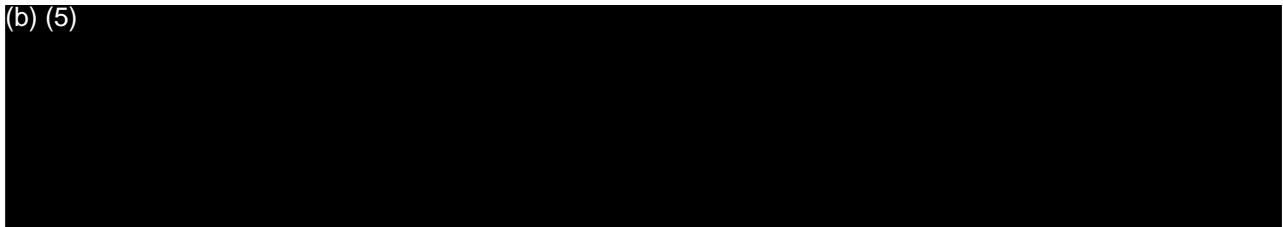
A. PROJECT INFORMATION

Park Name: Golden Gate National Recreation Area
Project Title: Interim Commercial Dog Walking Public Use Limit and Permit System
PEPC Project Number: 46523
Project Location:
County, State: San Francisco, California
County, State: Marin, California
Administrative Record Location: Fort Mason, Bldg 201; San Francisco, CA 94123

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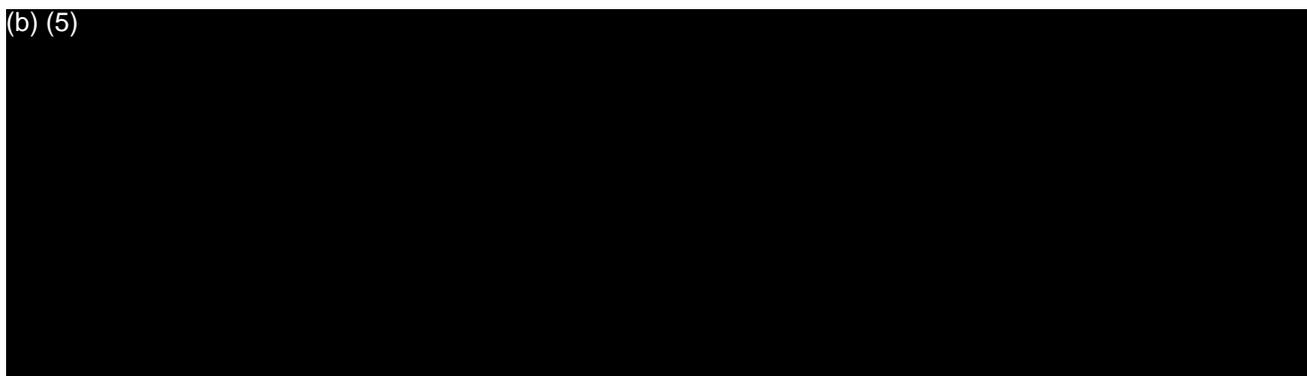
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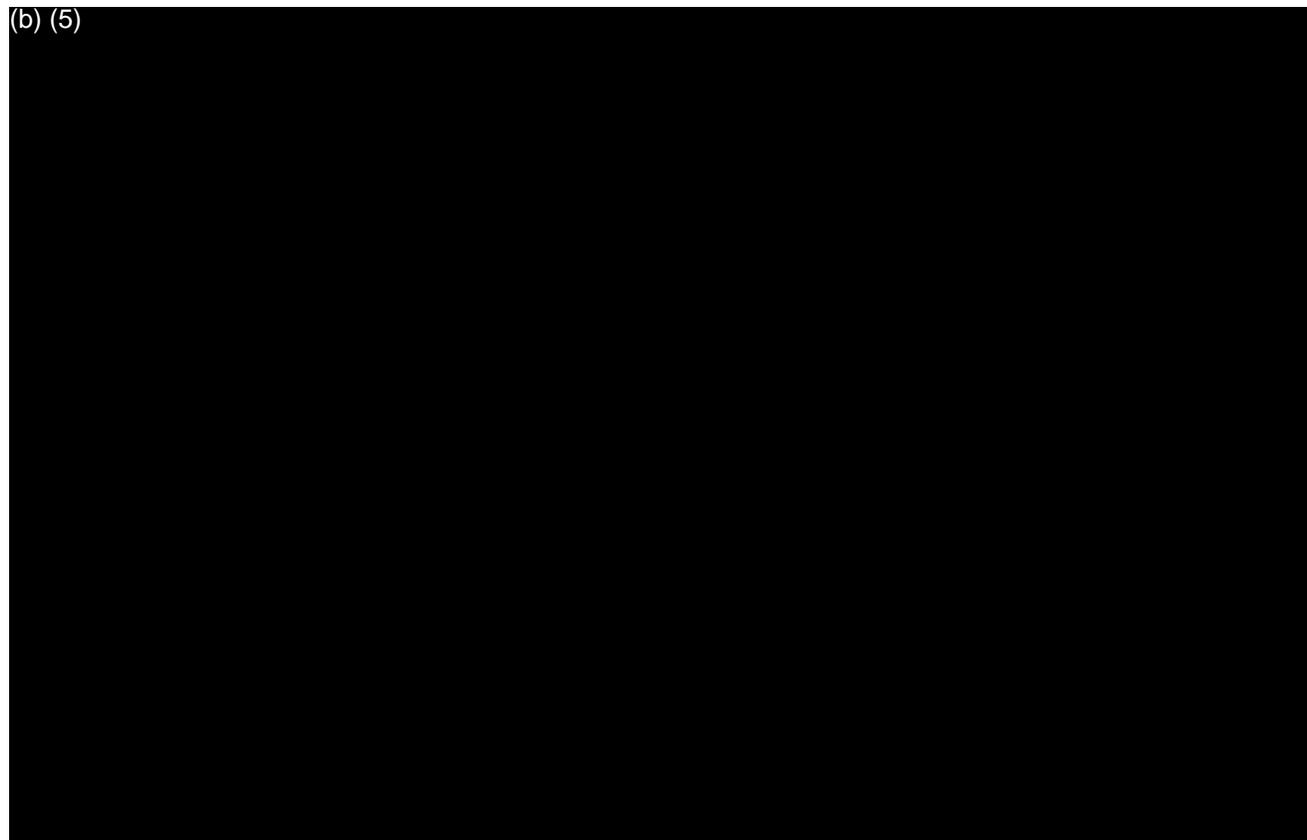
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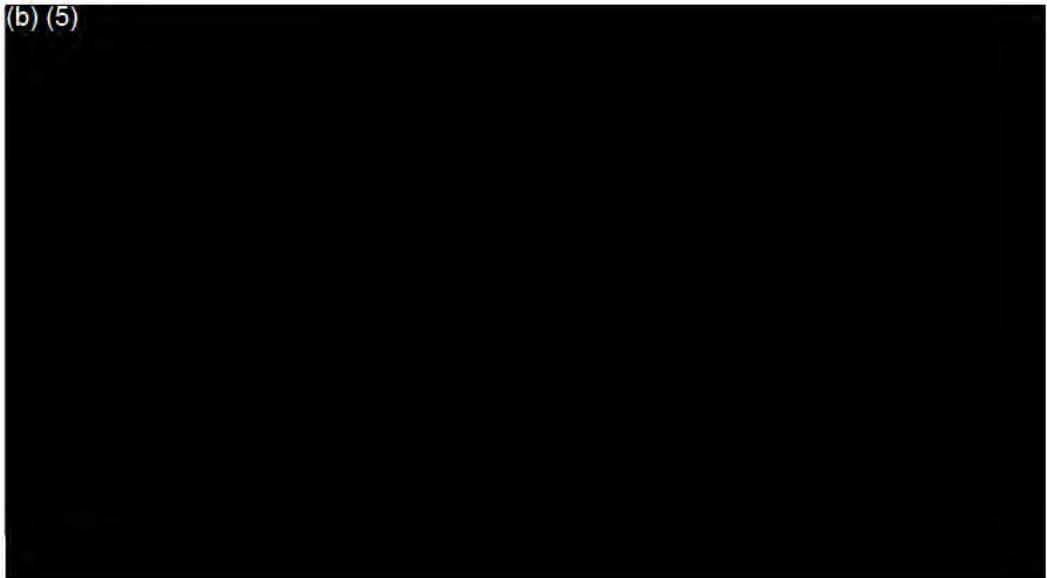
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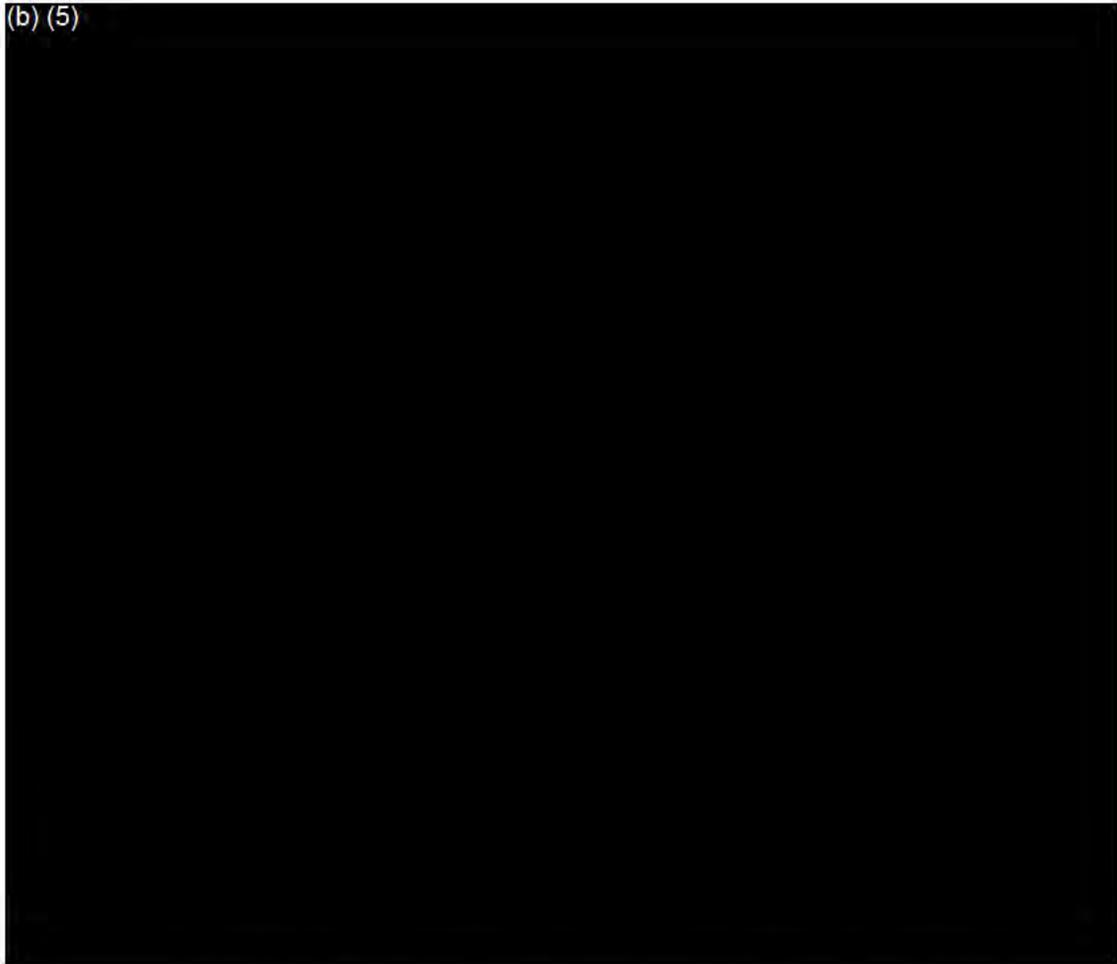


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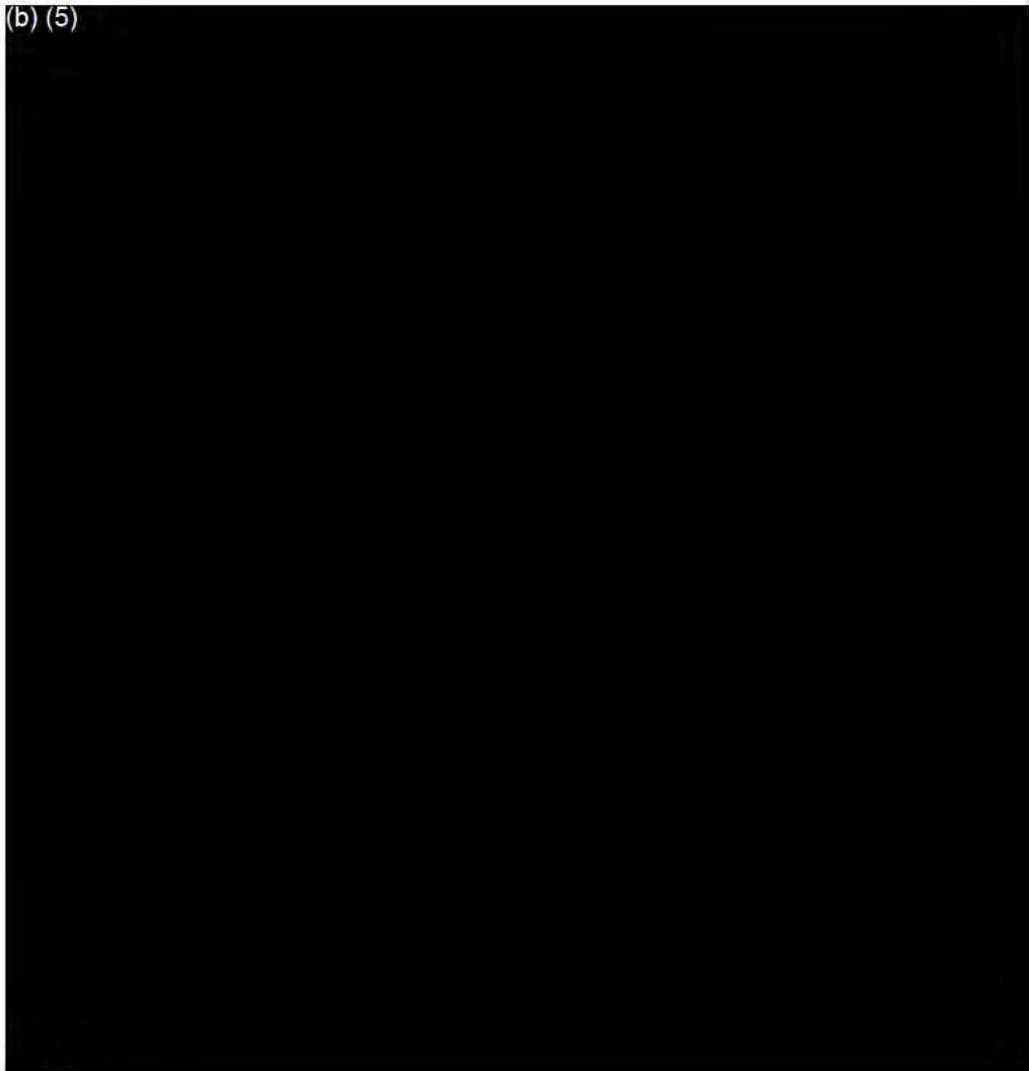
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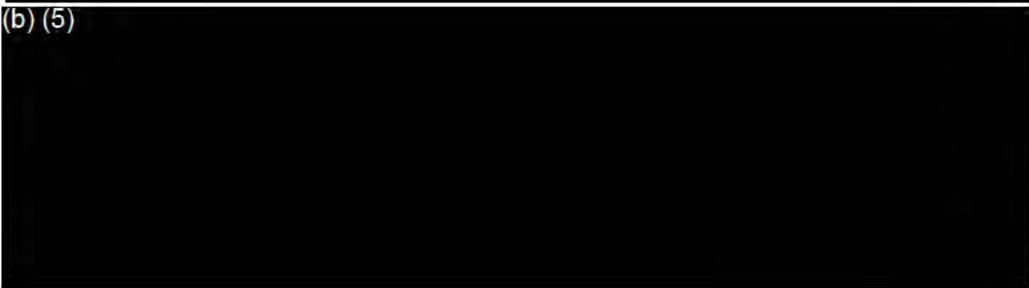
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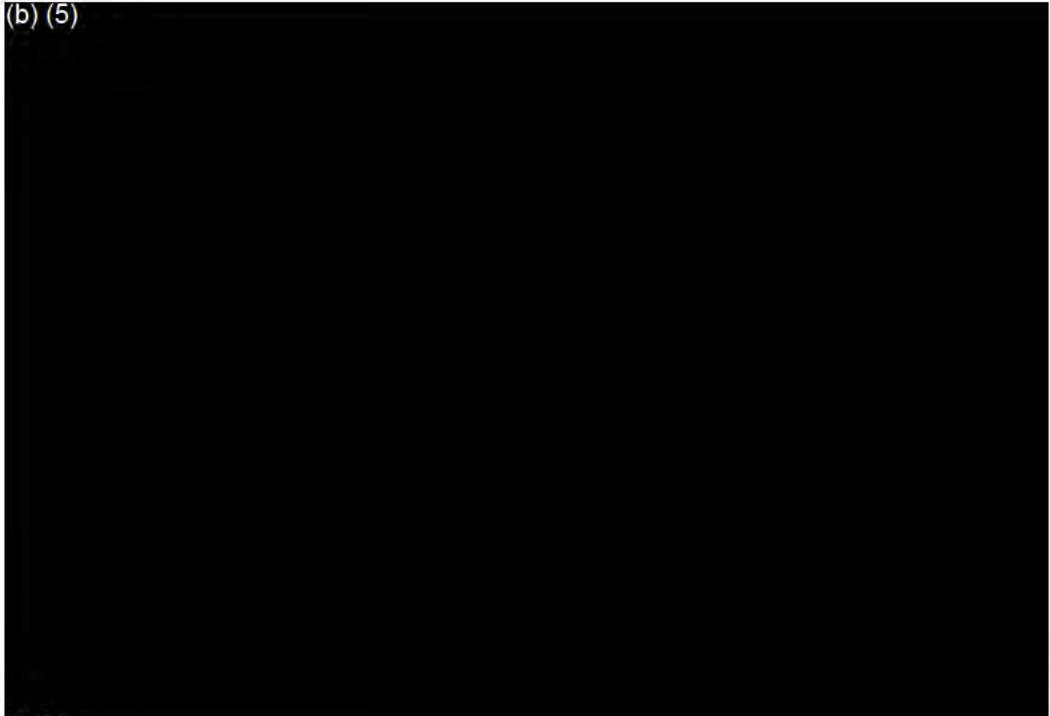
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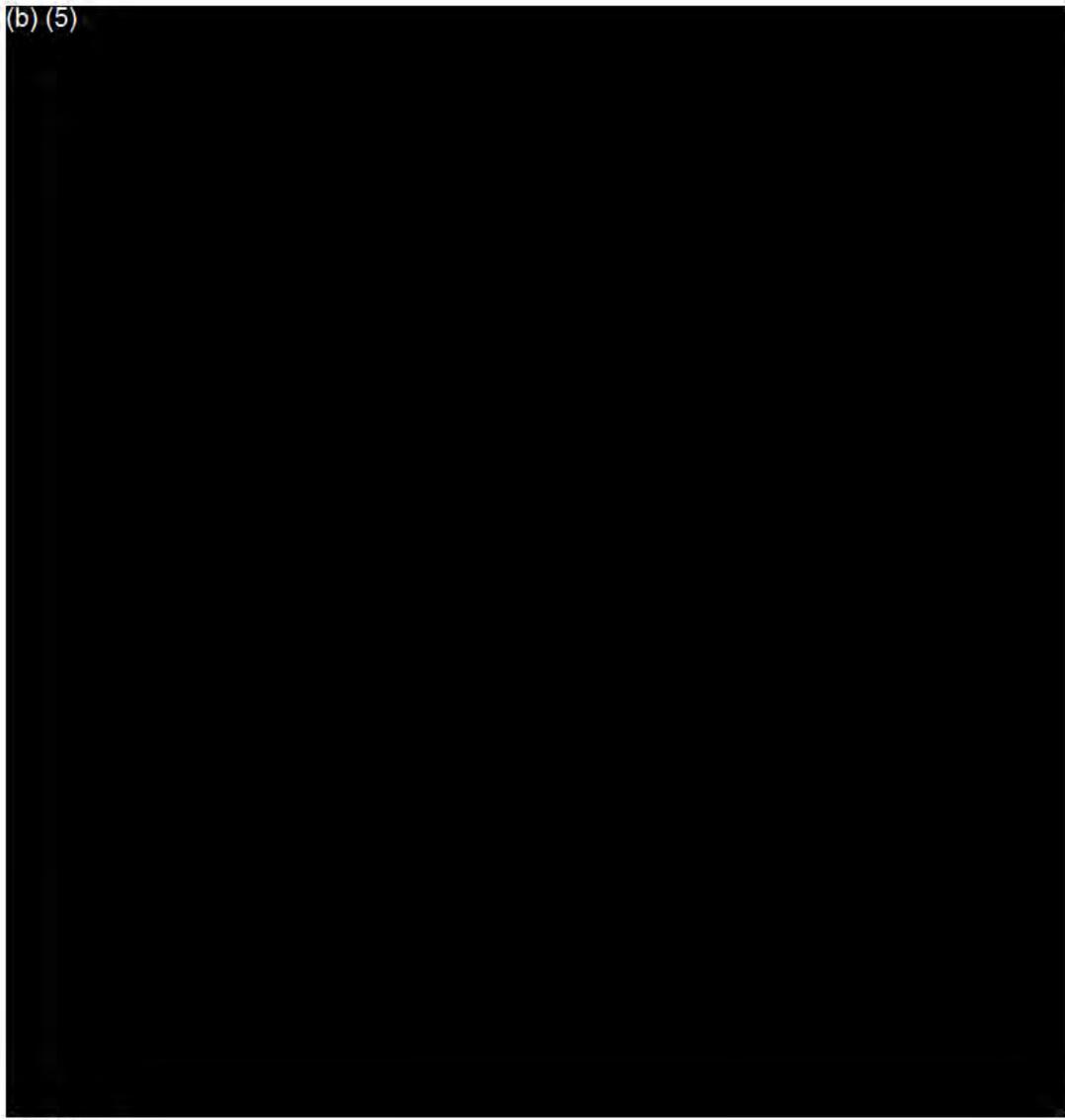
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GOLDEN GATE NATIONAL RECREATION AREA

**Interim Compendium Amendment
Commercial Dog Walking Permit Requirement**

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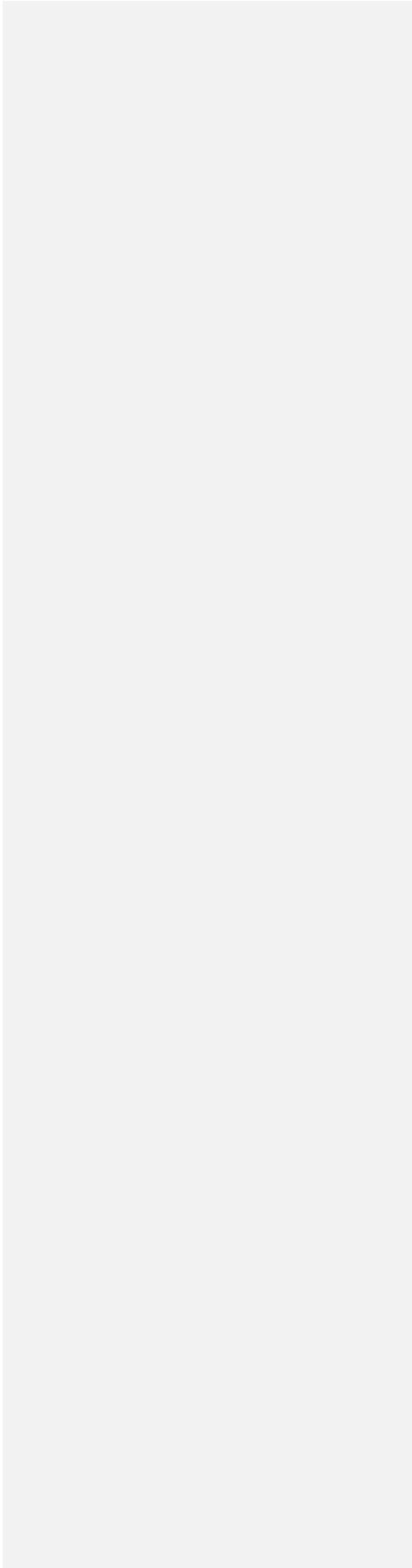
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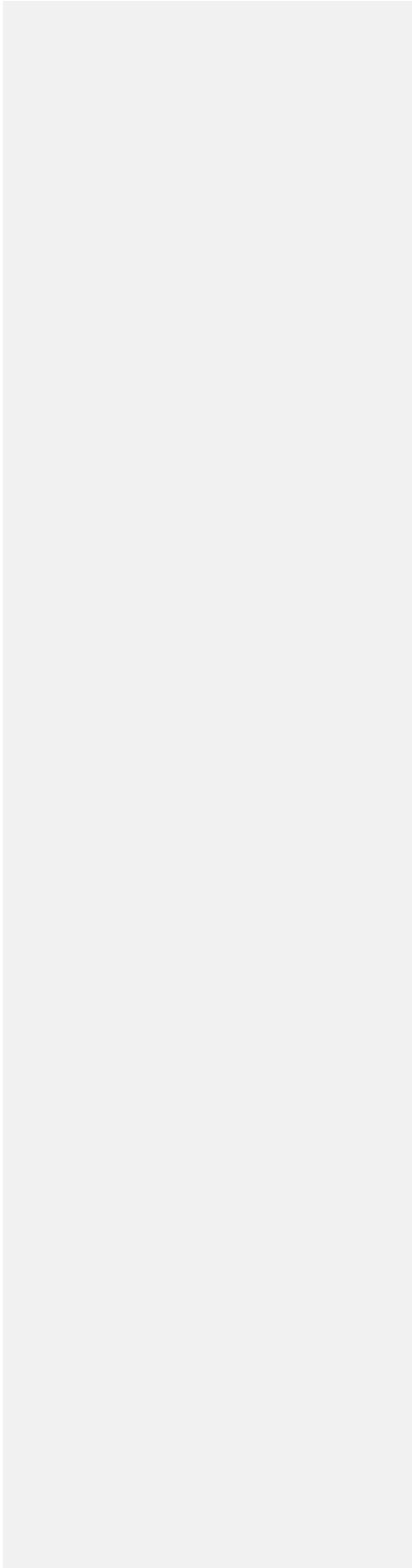
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United States Department of the Interior

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

IN REPLY REFER TO:
W34 (GOGA-VRPCR)

Memorandum

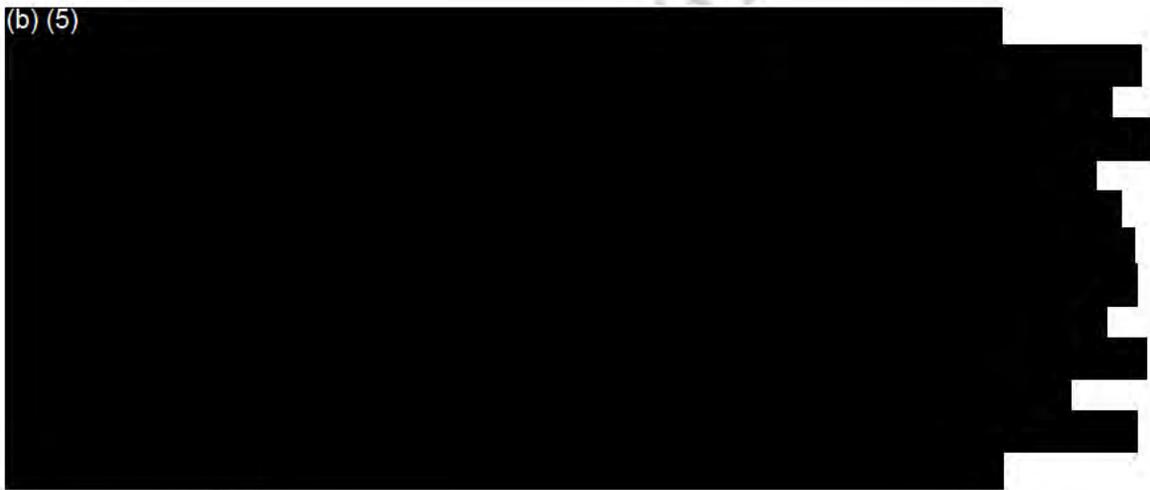
To: Frank Dean, General Superintendent

From: Kevin Cochary, Chief Ranger

Subject: Interim Compendium Amendment for Commercial Dog Walking

Summary:

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Recommended Regulatory Action

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Basis of the Interim Permit Six Dog Limit

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Applicable Law and Policy:

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NEPA Compliance:

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Predecisional Draft

United States Department of the Interior

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

IN REPLY REFER TO:
W34 (GOGA-SUPT)

Memorandum

To: General Superintendent, Golden Gate National Recreation Area

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

Subject: Interim Compendium Amendment for Commercial Dog Walking

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Attachment C
1979 GGNRA Citizen's Advisory Pet Policy

Attachment D

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

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

A. PROJECT INFORMATION

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

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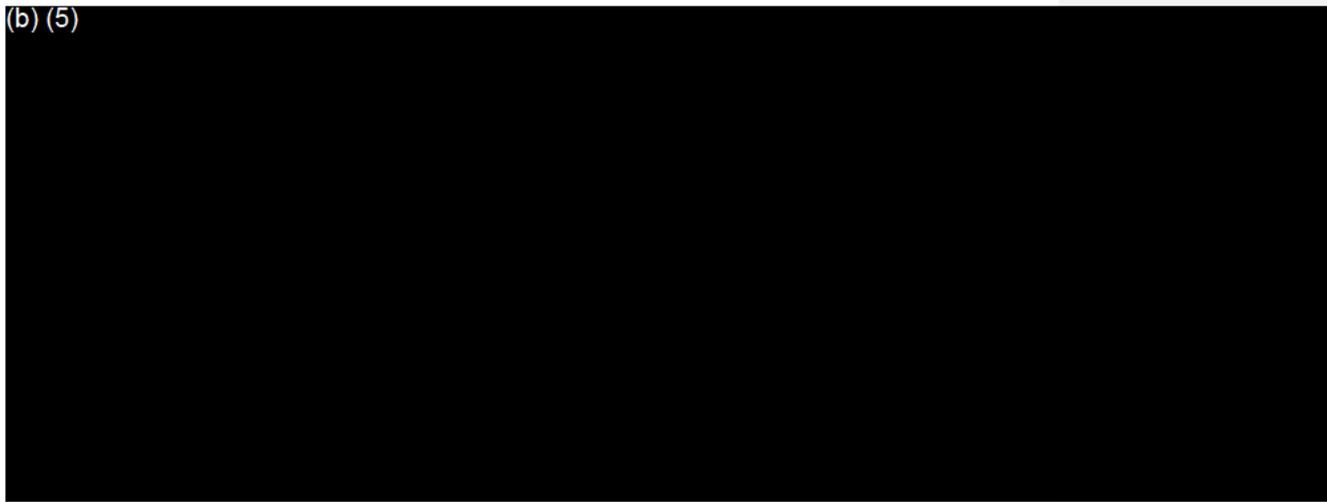
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**Crissy Field
Golden Gate NRA
DO-12 APPENDIX 1
ENVIRONMENTAL SCREENING FORM**

A. PROJECT INFORMATION

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

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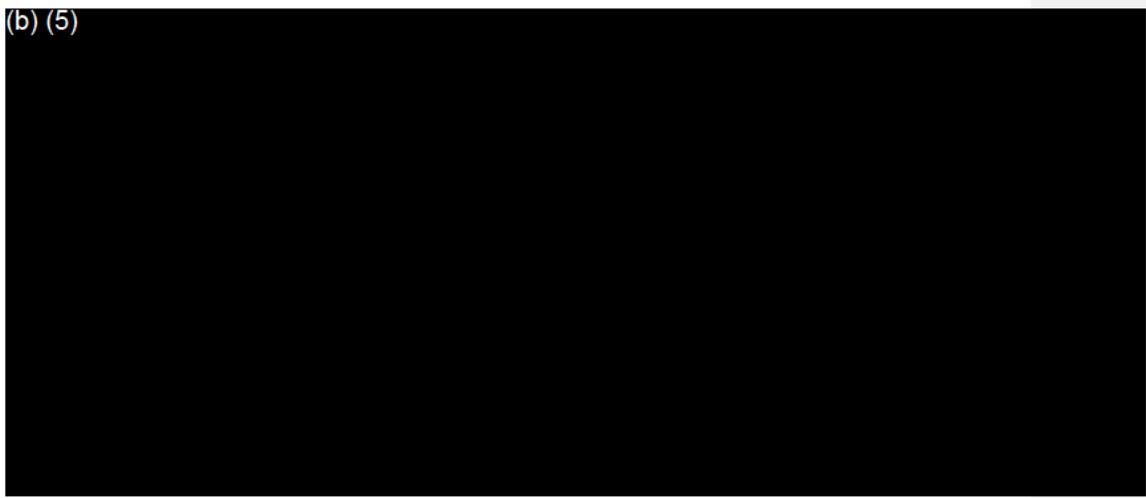
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GGNRA Dog Management Plan/EIS
Commercial Dogwalking
draft

BACKGROUND

Alternatives B, C, D, and E are the “action” alternatives. Commercial dogwalking is proposed in Alternatives B, C and E. Under Alternative B, commercial dogwalking would be regulated under the same guidelines and regulations that apply to recreational dogwalkers. Because Alternative B does not allow for off-leash dogwalking, commercial dogwalking would be on-leash only. In addition, the three dog maximum would apply equally to recreational dogwalkers and commercial dogwalkers.

Under Alternatives C, commercial dogwalking would be a permitted use under the National Parks Omnibus Management Act of 1998 (NPOMA), which authorizes certain commercial uses to provide visitor services in national parks. Commercial dogwalking would be permitted under a commercial use authorization, with visitor services being provided in part through education and training for visitors with dogs. In addition, if the ROLA certification program were triggered as part of an adaptive management strategy, commercial dogwalkers would be required, as a condition of their permit, to provide the ROLA certification program training.

Alternative E is similar to Alternative C, with the exception that were the ROLA certification program to be triggered by adaptive management, commercial dogwalking groups would be required to develop their own organization that would be responsible for providing the ROLA certification training, independent of NPS involvement, with the exception that NPS would develop the training standards to be met.

COMMERCIAL DOGWALKING CONCEPTS FROM THE NEGOTIATED RULEMAKING COMMITTEE:

The Negotiated Rulemaking Committee reviewed the following commercial dogwalking guidelines, and provided specific consensus recommendations on them to the NPS as noted. This consensus advice, which included some Commercial Dogwalking Concepts listed below, has been incorporated into Alternatives B, C, and E.

Commercial Dog Walking Concepts

The Negotiated Rulemaking Committee Work Group considered a set of guidelines for commercial dog walking offered by ProDog through its representative Joe Hague. The Golden Gate Audubon Society took a principled position opposing commercial dog walking in GGNRA. One other member of the Work Group also expressed concern about the principle of commercial dog walking in GGNRA. If, however, the decision is made to allow commercial dog walking in GGNRA, the following guidelines were proposed based on the ProDog proposal.

- 1) Professional Dog walkers must carry a leash for each dog in their care.
- 2) Professional Dog walkers must pickup dog waste for all dogs in their care.
- 3) Professional Dog walkers will be limited to six dogs.
- 4) Professional Dog walkers will carry a liability insurance policy for \$1 million. Proof of policy must be shown to acquire permit.
- 5) Professional Dog walkers will pay a permit fee to use the GGNRA lands, (recommend \$100 per dog walker, as they also must pay county permit fees).
- 6) Professional Dog walkers will transport dogs in a safe well ventilated vehicle.
- 7) Professional Dog walkers must have their dogs under control (see Dog Management Guideline #14 define “control”).
- 8) Professional Dog walkers must abide by all rules regarding off leash dogs on GGNRA lands.
- 9) Having more then the allowed number of dogs will result in a fine for every dog over the limit. Second offense will result in a doubling of the fine, per dog. Third offense will result in suspension of dog walkers’ permit for up to three months.

Based on the discussion, consensus was reached on putting forward the commercial dogwalking proposal to be analyzed in the NEPA process, with the following conditions:

- The NEPA analysis should address the question of whether to allow commercial dogwalking in the GGNRA.
- Commercial dogwalking in any GGNRA area will be subject to an analysis of overall carrying capacity of that area.
- NPS will evaluate the maximum number of dogs a commercial dogwalker may have at one time (Guideline #3), permit fees (Guideline #5), fines (Guideline #9), and how many dogs should be off-leash at any given time.
- Delete Guideline #7. (Note that Guideline 7 was deleted as redundant, because the control issue was covered under the Nine Guiding Principles agreed upon by the Negotiated Rulemaking Committee).
- All other proposed guidelines will be as noted in the progress report from the Work Group (see Attachment B, #4).

ALTERNATIVE A:

- This alternative reflects the current NPS servicewide approach to dogwalking as reflected by 36 CFR 2.15, and the intervening lawsuit U.S. v. Barley, in which personal off-leash dogwalking was allowed to continue in those areas where it was deemed acceptable by the 1979 Pet Policy, until NPS could establish new rules under the Administrative Procedure Act’s notice and comment rulemaking requirements. While the 1979 Pet Policy did not address commercial dogwalking, its allowance or prohibition has not been specifically addressed by the NPS at Golden Gate NRR. This alternative reflects the current, unregulated nature of commercial dogwalking.

ALTERNATIVE B:

- This alternative reflects the NPS servicewide approach to dogwalking as reflected by 36 CFR 2.15. This is the approach as reflected by current servicewide NPS

policy and regulations, but is not currently enforced in GGNRA in those areas where the 1979 Pet Policy was in effect. Under this alternative, commercial dogwalkers would fall under the same general guidelines as any other recreational user, including a maximum of three dogs per dogwalker.

ALTERNATIVE C:

- This alternative seeks to maximize the diversity of visitor uses and also includes the consensus agreements reached by the GGNRA Dog Management Negotiated Rulemaking Committee. Dogwalkers are recognized as one of many recreational groups within GGNRA. A balance is sought to insure that all groups have adequate access, and that one use will not unduly infringe on other recreational uses. Commercial dogwalking will be allowed under this alternative in both on and off-leash areas. Specifically, commercial dogwalkers will be authorized under a CUA. As a condition of the CUA permit, commercial dogwalkers will be required to provide educational and outreach activities to dogwalkers, including at special events. In addition, where the ROLA certification program is triggered through adaptive management, commercial dogwalkers would be required to provide the training classes specific to the ROLA certification program, but would not be in charge of the overall ROLA program.
- Specific elements:
 - Educational and outreach activities will be provided by commercial dogwalkers, but coordinated by the NPS. Failure to provide educational services will result in permit revocation. Examples include:
 - Provide classes at GGNRA sites on dogwalking etiquette in parks and open spaces
 - Provide information on dogwalking at special events in the park.
 - Act as a source of information on dogwalking areas within GGNRA.
 - Provide ROLA certification training if triggered by adaptive management.
 - Locations where allowed: Areas of Ft. Funston, Ft. Mason, Ocean Beach, Crissy Field, Alta Ave., and Baker Beach *where both on and off leash dogwalking is allowed per this alternative.*
 - One permit will be issued per company, which may allow for multiple dogwalkers. Each permit may have different terms and costs. Permit terms are left to the discretion of the Business Division, pursuant to the overall terms and/or limits set forth in this alternative.
 - On or off leash allowed, with 3 dog limit per permitted dogwalker.
 - Must have current ROLA certification (refer to guidelines of ROLA program).
 - Caps on the number of commercial dogwalking permits issued will be determined based on whether or not there will be “minimal impact on park resources and values” (2006 NPS Management Policies). This determination shall be made at the discretion of the NPS Business Management Division, pursuant to the guidance set forth in the 2006 NPS Management Policies

Comment [ses1]: Again, should we consider Rodeo Beach? Putting all the Marin demand in one area seems excessive

- Use restrictions may be based on time of day and/or seasonal restrictions.
- In addition to numerical caps, an adaptive management strategy will be used as follows:
 - Monitor complaints, non-compliance, and impacts and report to park administration, Law Enforcement, Natural and Cultural Resources, and Business Management Divisions.
 - Where complaints, non-compliance, or impacts demonstrate that resources, visitor use or other commercial services are receiving more than a minimal impact per the CUA permit requirements, reduce number of commercial services permits provided at each location, either through immediate revocation (abuse of permit), or by not granting renewal.
- Visible sign of a permit required or designated clothing.
- Offenses:
 - All offenses may result in a ticket. 3rd offense in a calendar year results in inability to renew permit after two years. 4th offense in a calendar year results in immediate revocation. The “local file,” a file representing number of violations per dogwalker and commercial dogwalking company, is referenced and updated after each violation, allowing LE to track, in real time, whether or not a CUA shall be revoked. *(This would require the Business Management Division to check the LE database for each permit renewal).*
 - The NPS Law Enforcement Division will work with the U.S. Attorney’s office and U.S. District Court to establish appropriate fines (bail schedule).

Comment [ses2]: Should there be a difference as to whether the offenses (b) (5)

ALTERNATIVE D:

- This alternative seeks to exceed the requirements of basic federal resource protection laws and policies, such as the NPS Organic Act and Endangered Species Act. This alternative errs on the side of caution by providing maximum protection to plant and animal species within the park, while still recognizing that GGNRA was established to provide recreational open space and that some impacts are inevitable. This alternative would not allow commercial dogwalking, due to the emphasis on resource protection.

ALTERNATIVE E:

- This alternative seeks to maximize access to dogwalkers, while still being consistent with NPS laws and policies. As a result, this alternative is the most management intensive. This alternative also includes the consensus agreements reached by the GGNRA Dog Management Negotiated Rulemaking Committee. Commercial dogwalking will be allowed under this alternative in both on and off-leash areas. As a condition of the CUA permit, commercial dogwalkers will provide education and outreach in the park related to dogwalking at GGNRA. Commercial dogwalkers will not provide certification training as part of the ROLA certification program unless it is instituted as part of the adaptive

management strategy. This alternative envisions dogwalking groups (both recreational and commercial) organizing and managing the ROLA certification program. If the program were not able to be organized and managed by dog groups, ROLA certification, as a first step in the adaptive management process, would be eliminated, with the next step being revocation to on-leash (in an originally off-leash) area, or revocation to no dogs (in an originally on-leash area). This alternative places the responsibility for the ROLA certification program squarely on both commercial and recreational dog groups. Failure to manage the ROLA program would not result in revocation of a commercial dogwalking permit (CUA), but would eliminate an area as off-leash, or possibly on-leash.

- Specific elements:

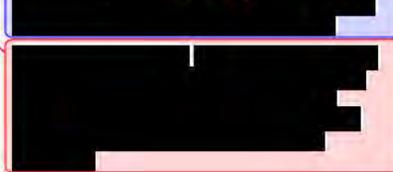
- Educational and outreach activities will be provided by commercial dogwalkers, but coordinated by the NPS. Failure to provide educational services will result in permit revocation. Examples include:
 - Provide classes at GGNRA sites on dogwalking etiquette in parks and open spaces
 - Provide information on dogwalking at special events in the park.
 - Act as a source of information on dogwalking areas within GGNRA.
- Locations where allowed: Areas of Ft. Funston, Ft. Mason, Ocean Beach, Crissy Field, Alta Ave., and Baker Beach *where on and off-leash dogwalking is allowed per this alternative.*
- One permit will be issued per company, which may allow for multiple dogwalkers. Each permit may have different terms and costs. Permit terms are left to the discretion of the Business Division, pursuant to the overall terms and/or limits set forth in this alternative.
- On or off leash dogwalking allowed, with 3 dog limit per permitted dogwalker.
- Must have current ROLA certification (refer to guidelines of ROLA program).
- Caps on the number of commercial dogwalking permits issued will be determined based on whether or not there will be “minimal impact on park resources and values” (2006 NPS Management Policies). This determination shall be made at the discretion of the NPS Business Management Division, pursuant to the guidance set forth in the 2006 NPS Management Policies
- Use restrictions may be based on time of day and/or seasonal restrictions.
- In addition to numerical caps, an adaptive management strategy will be used as follows:
 - Monitor complaints, non-compliance, and impacts and report to park administration, Law Enforcement, Natural and Cultural Resources, and Business Management Divisions.
 - Where complaints, non-compliance, or impacts demonstrate that resources, visitor use or other commercial services are receiving more than a minimal impact per the CUA permit requirements, reduce number of commercial services permits provided at each

Comment [ses4]: And Rodeo Beach?

location, either through immediate revocation (abuse of permit), or by not granting renewal.

- Visible sign of a permit required or designated clothing.
- Offenses:
 - All offenses may result in a ticket. 3rd offense in a calendar year results in inability to renew permit after two years. 4th offense in a calendar year results in immediate revocation. The “local file,” a file representing number of violations per dogwalker and commercial dogwalking company, is referenced and updated after each violation, allowing LE to track, in real time, whether or not a CUA shall be revoked. *(This would require the Business Management Division to check the LE database for each permit renewal).*
 - The NPS Law Enforcement Division will work with the U.S. Attorney’s office and U.S. District Court to establish appropriate fines (bail schedule).

Comment [MBE5]: (b) (5)



DRAFT
8/1/2013

THE PRESIDIO TRUST

36 CFR Part 1002

Public Use Limit on Commercial Dog Walking

AGENCY: The Presidio Trust

ACTION: Proposed interim rule and request for comments.

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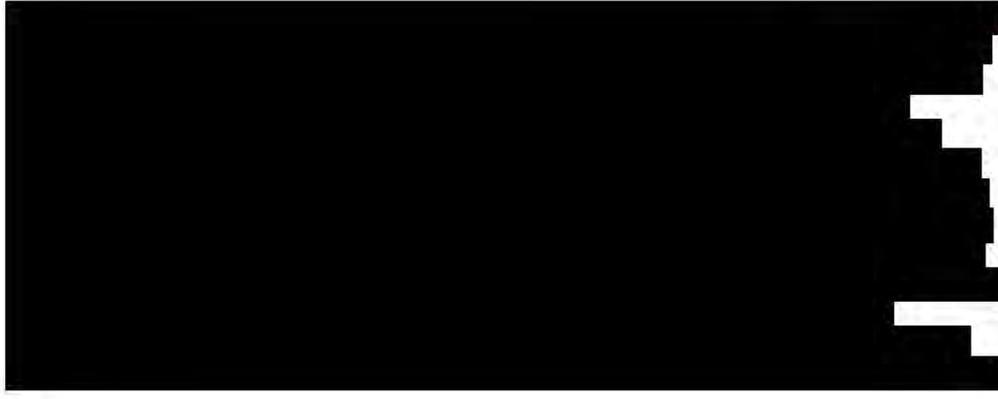
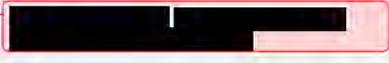
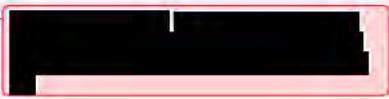
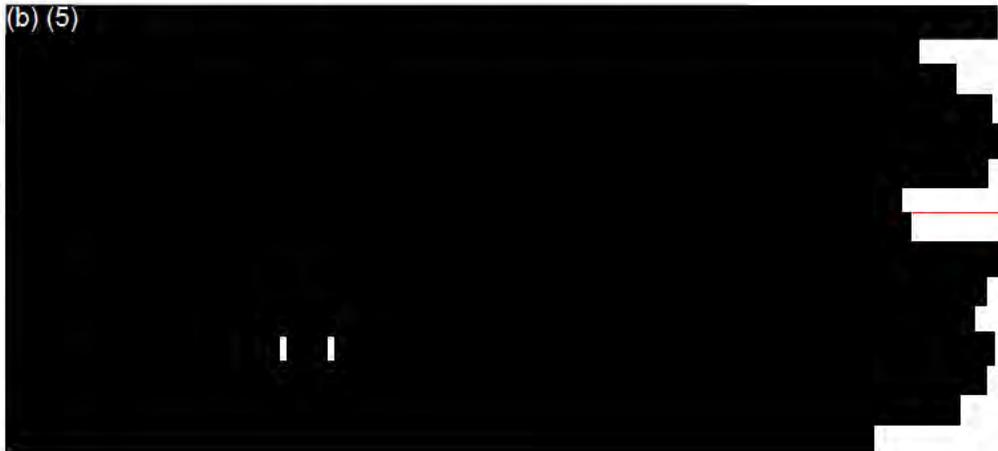
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Anonymous comments may not be considered.

FOR FURTHER INFORMATION CONTACT: Joshua Steinberger, 415.561.5300.

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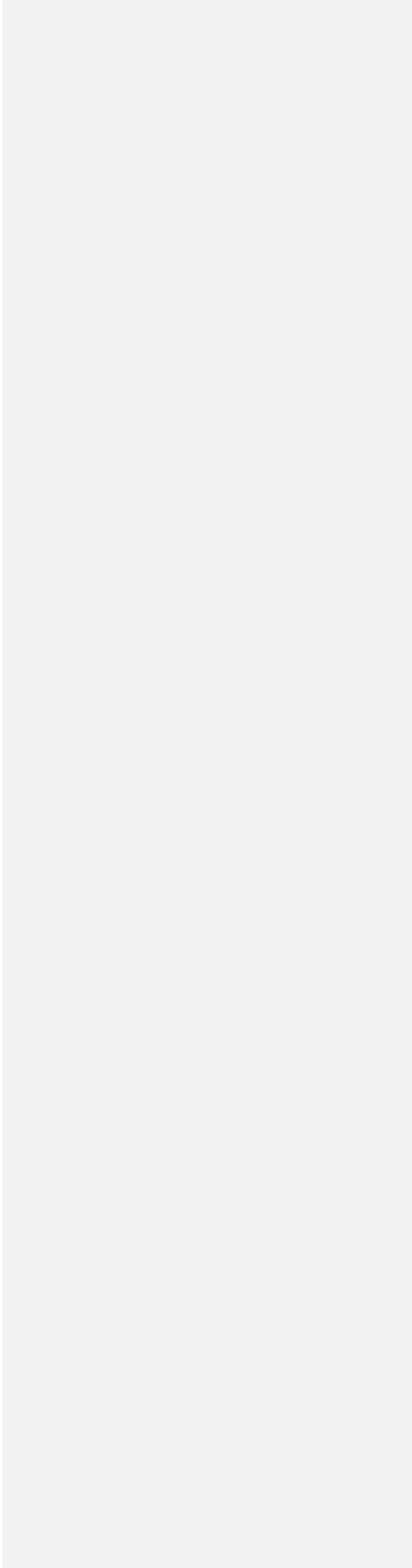
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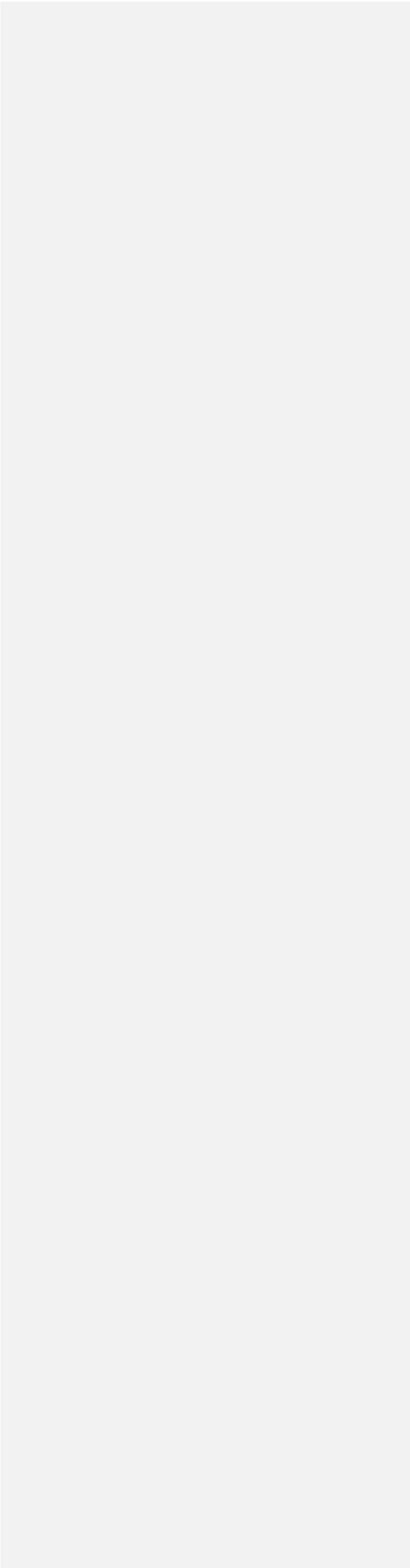
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8/1/2013

THE PRESIDIO TRUST

36 CFR Part 1002

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Anonymous comments may not be considered.

FOR FURTHER INFORMATION CONTACT: Joshua Steinberger, 415.561.5300.

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the many different users of the Presidio, equitable allocation and use of facilities, ensuring

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holders must also abide by all NPS regulations. The ~~NPS-GNRA~~ action is an interim

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National Park Service
U.S. Department of the Interior

Golden Gate National Recreation Area
Date: 11/22/2013

Interim Commercial Dog Walking Public Use Limit and Permit System

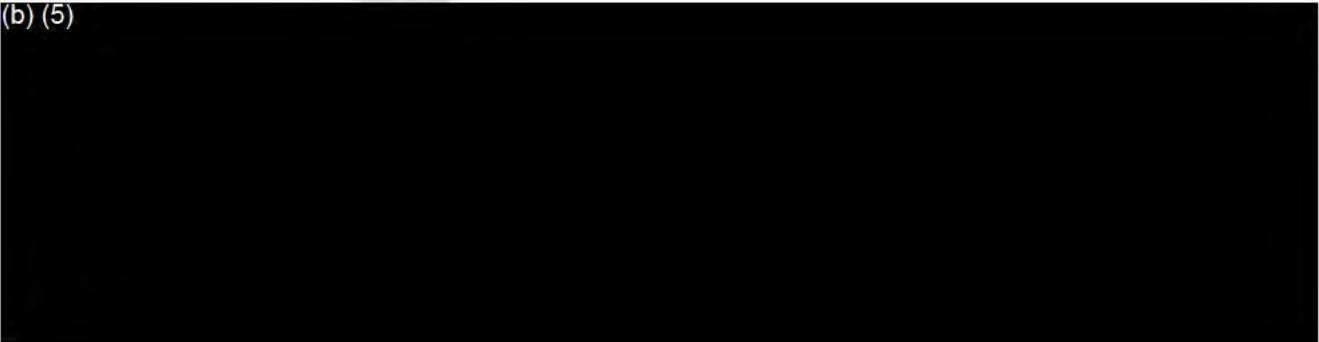
A. PROJECT INFORMATION

Park Name:	Golden Gate National Recreation Area
Project Title:	Interim Commercial Dog Walking Public Use Limit and Permit System
PEPC Project Number:	46523
Project Location:	
County, State:	San Francisco, California
County, State:	Marin, California
Administrative Record Location:	Fort Mason, Bldg 201; San Francisco, CA 94123

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Ocean Beach Fire Policy

August 2013

INTRODUCTION

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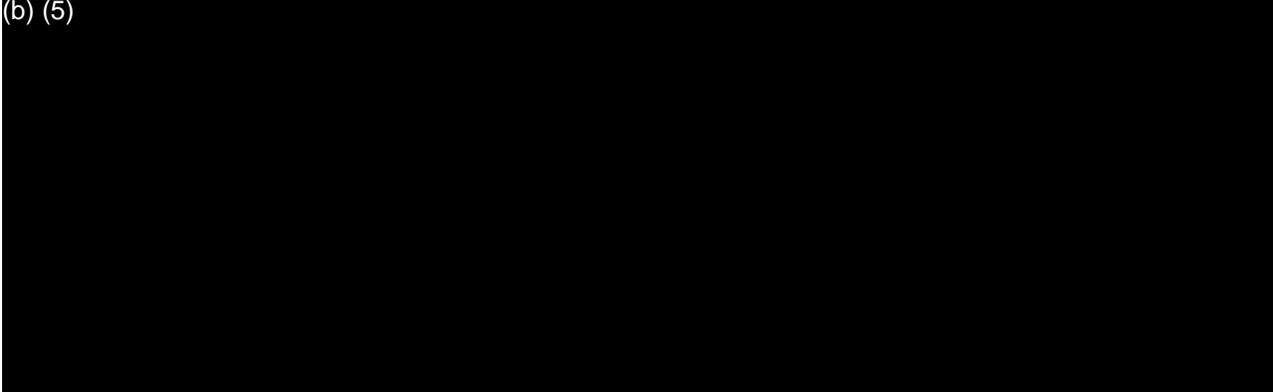
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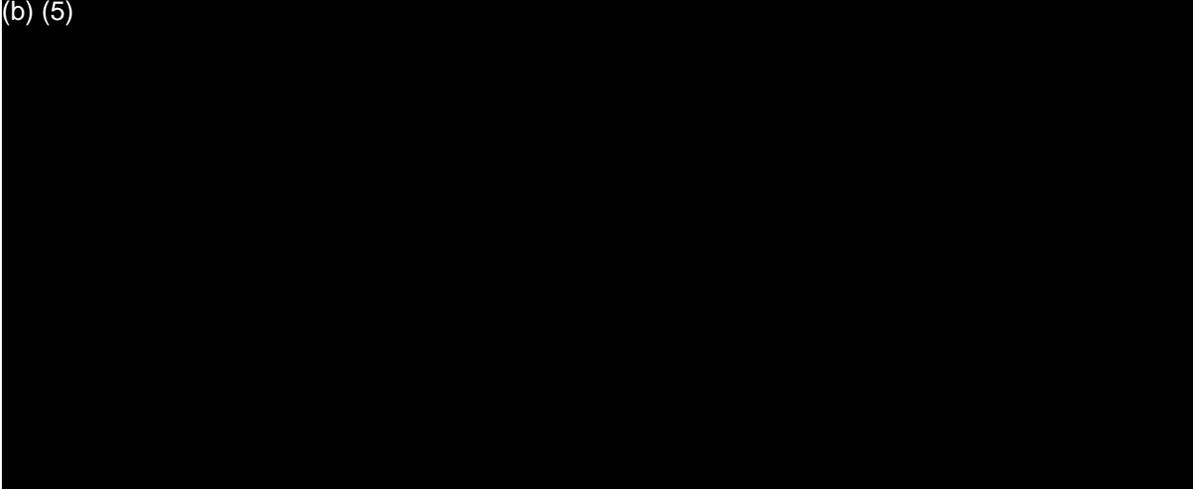
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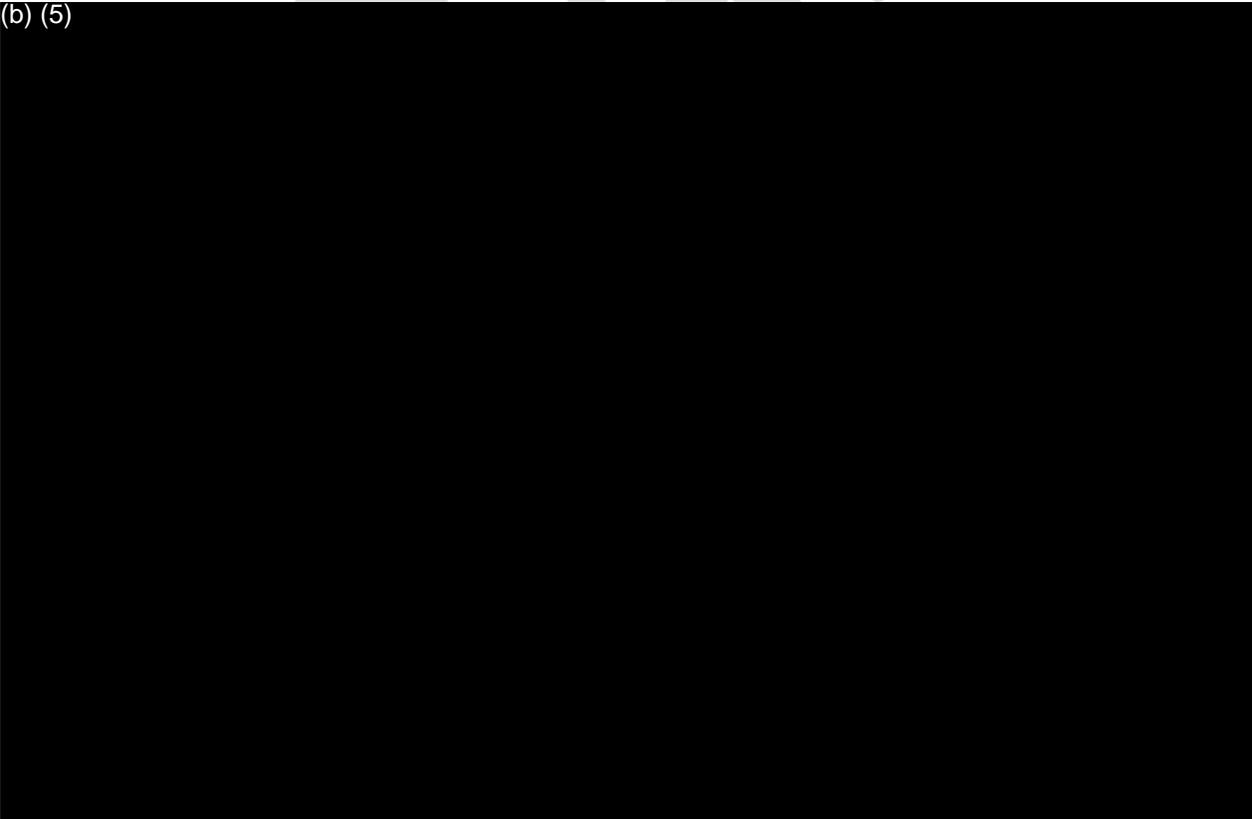
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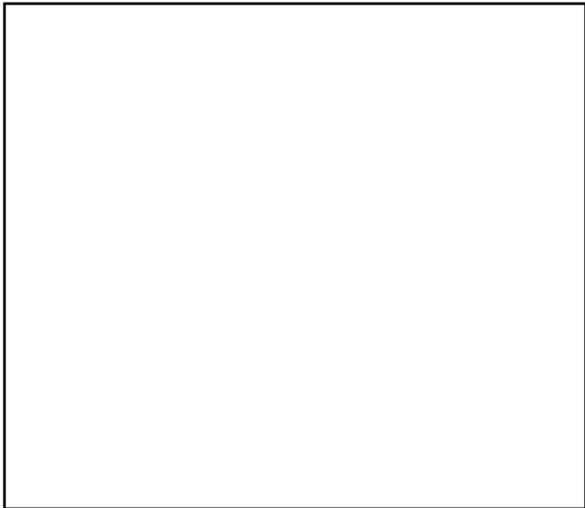


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PARK ESF ADDENDUM

Today's Date: May 21, 2013

PROJECT INFORMATION

Park Name: Golden Gate National Recreation Area
Commercial Dog Walking Interim Compendium Amendment

Project Title:

46523

PEPC Project Number:

Regulatory

Project Type:

San Francisco and Marin County park sites

Project Location:

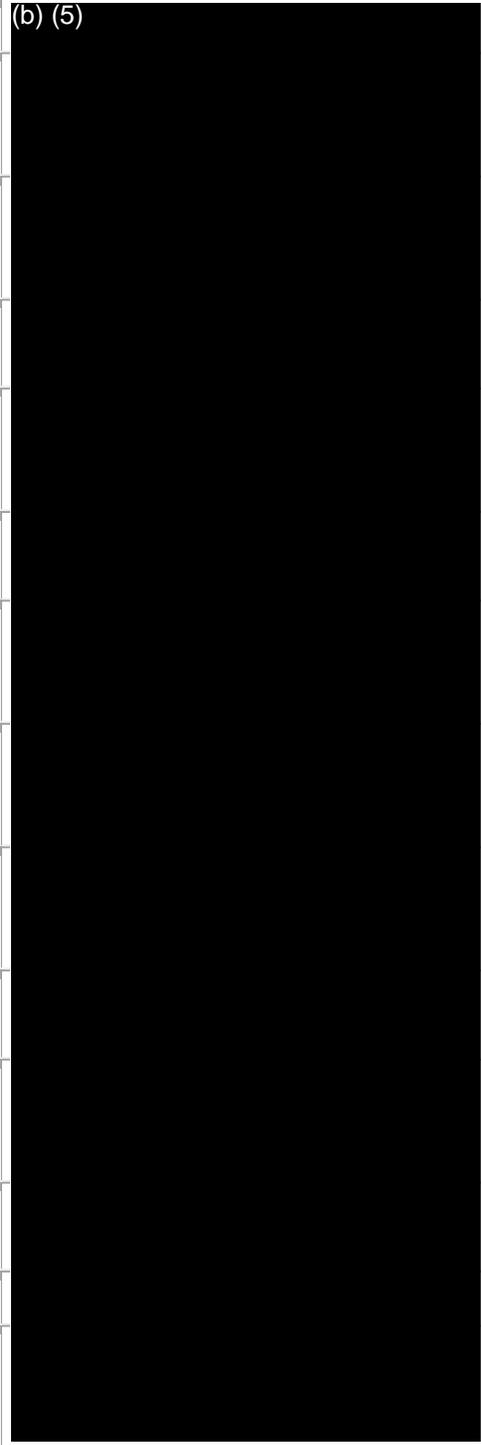
Shirwin Smith, Management Assistant

Project Leader:

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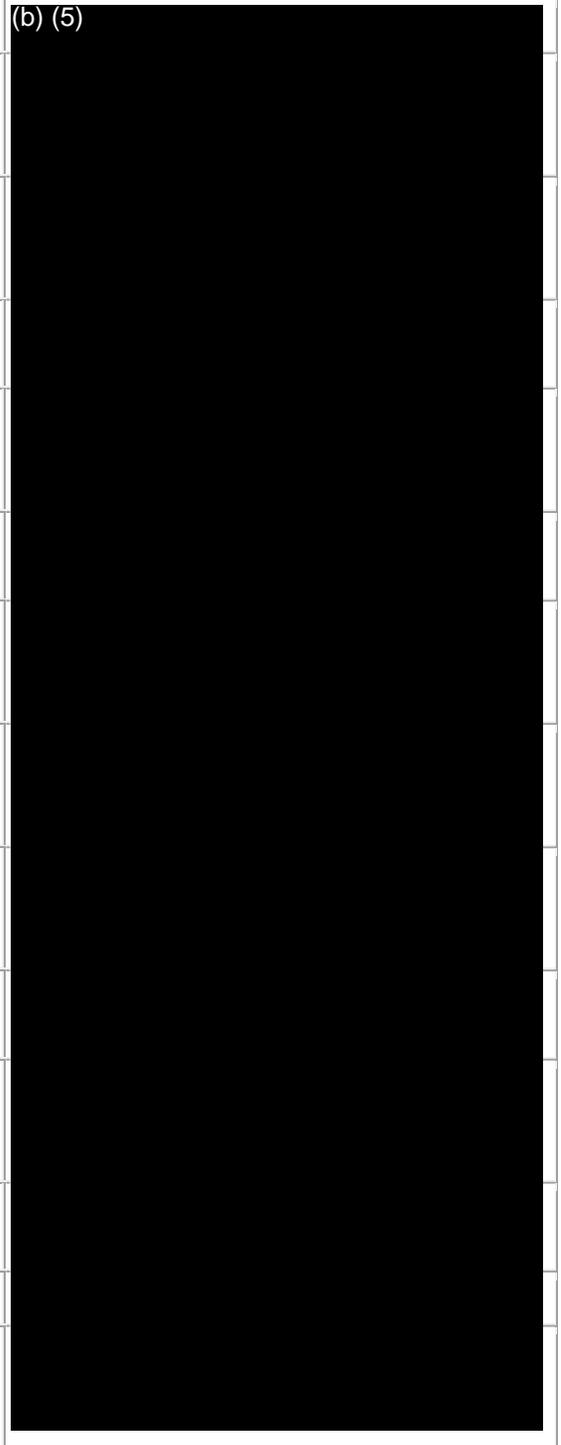
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National Park Service
U.S. Department of the Interior

Golden Gate National Recreation Area
Date: 11/22/2013

**Interim
Commercial Dog Walking
Public Use Limit
and
Permit System**

A. PROJECT INFORMATION

Park Name: Golden Gate National Recreation Area
Project Title: Interim Commercial Dog Walking Public Use Limit
and Permit System
PEPC Project Number: 46523
Project Location:
County, State: San Francisco,
California
County, State: Marin, California
Administrative Record Location: Fort Mason, Bldg 201; San Francisco, CA 94123

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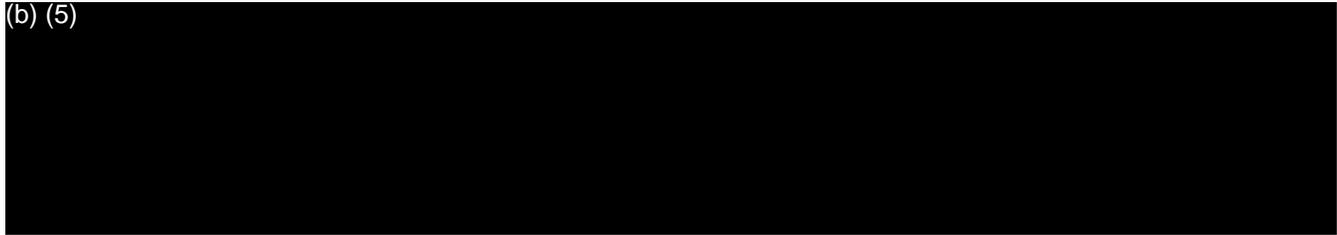
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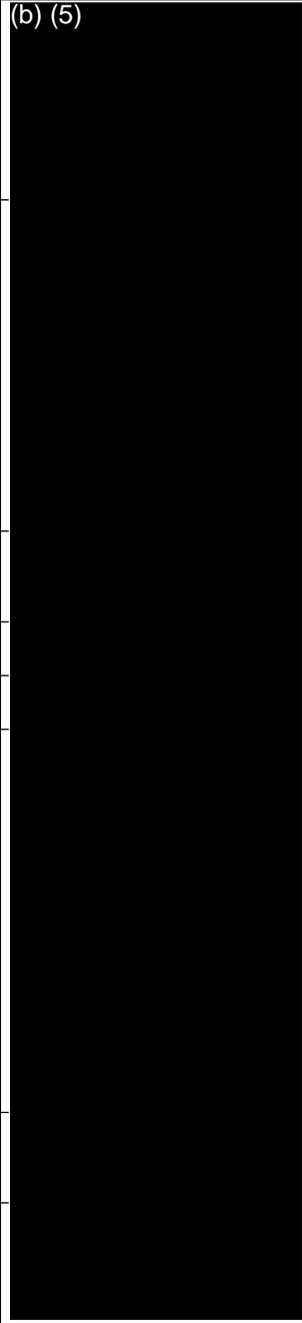
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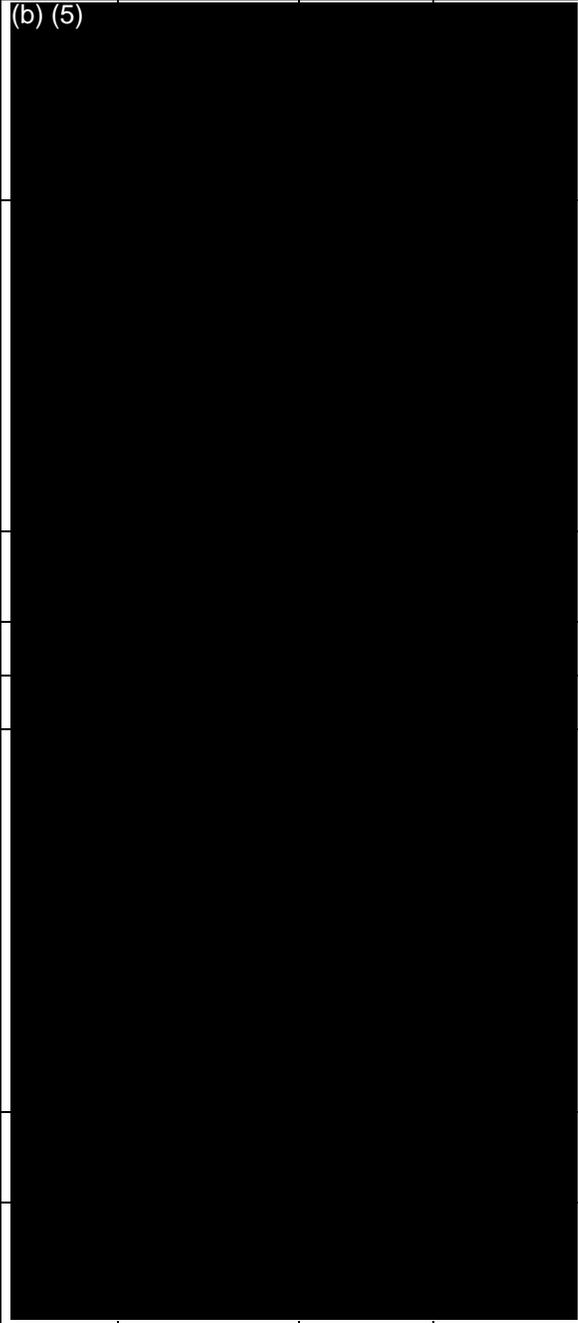
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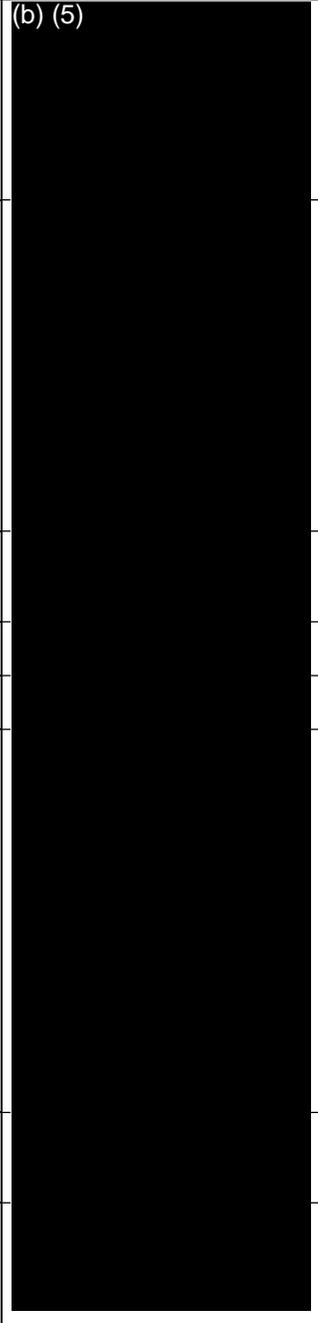
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National Park Service
U.S. Department of the Interior

Golden Gate National Recreation Area
Date: 11/24/2013

Interim Commercial Dog Walking Public Use Limit and Permit System

A. PROJECT INFORMATION

Park Name: Golden Gate National Recreation Area
Project Title: Interim Commercial Dog Walking Public Use Limit and Permit System
PEPC Project Number: 46523
Project Location:
County, State: San Francisco, California
County, State: Marin, California
Administrative Record Location: Fort Mason, Bldg 201; San Francisco, CA 94123

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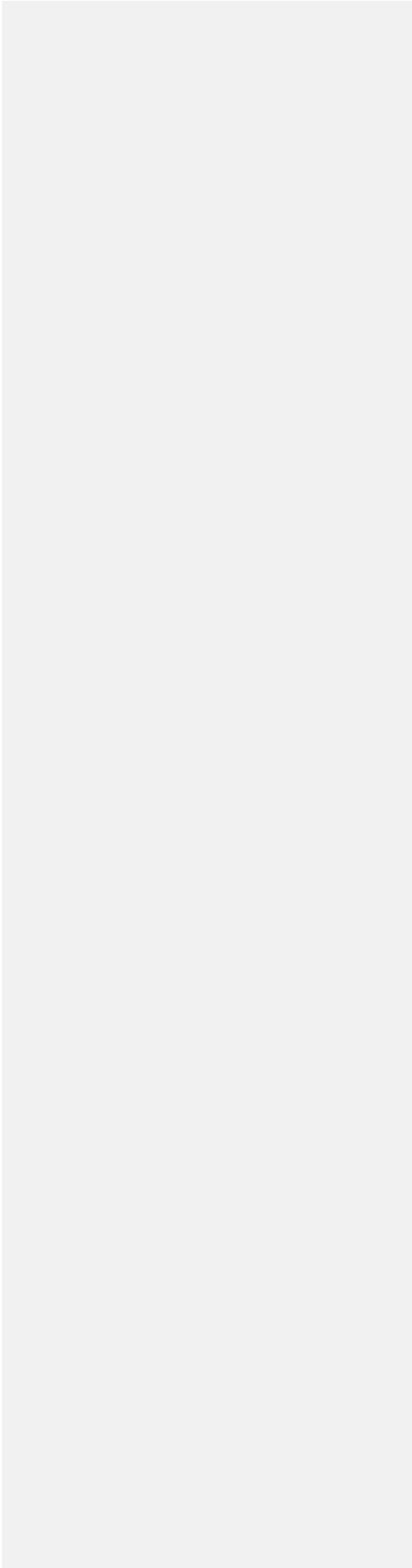
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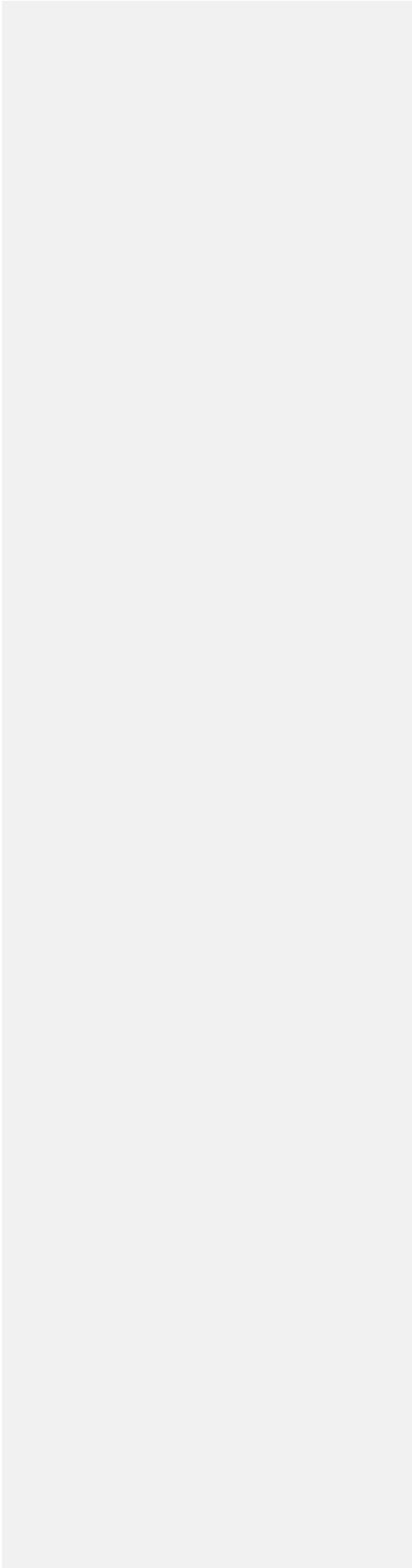
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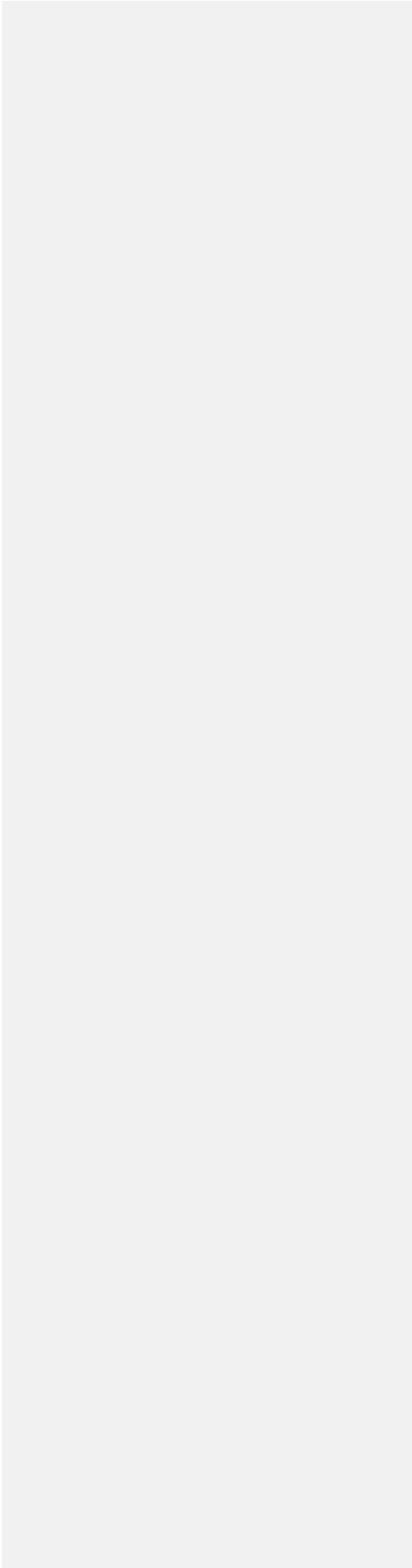
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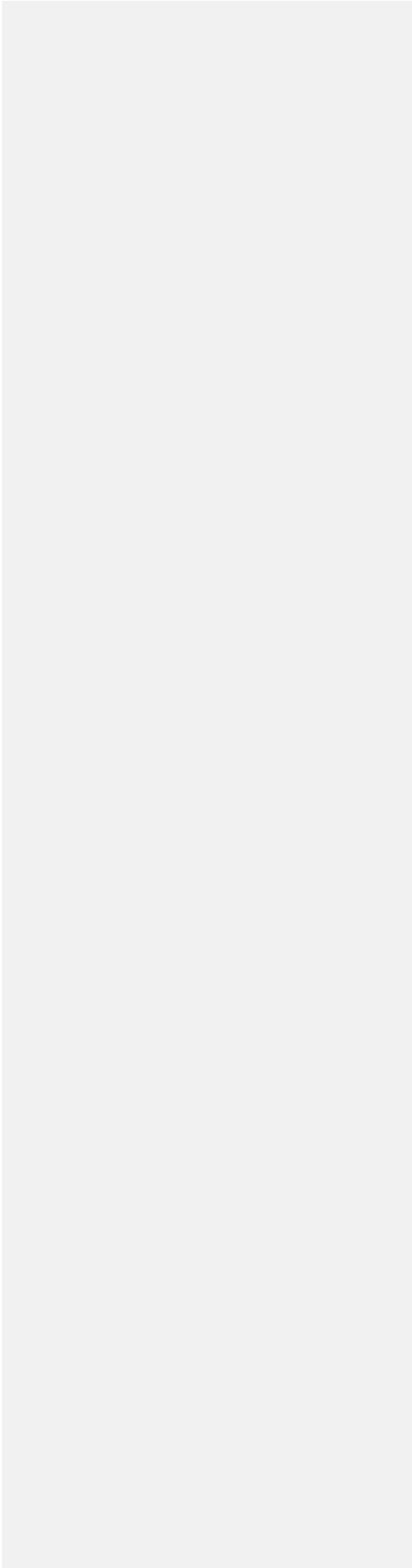
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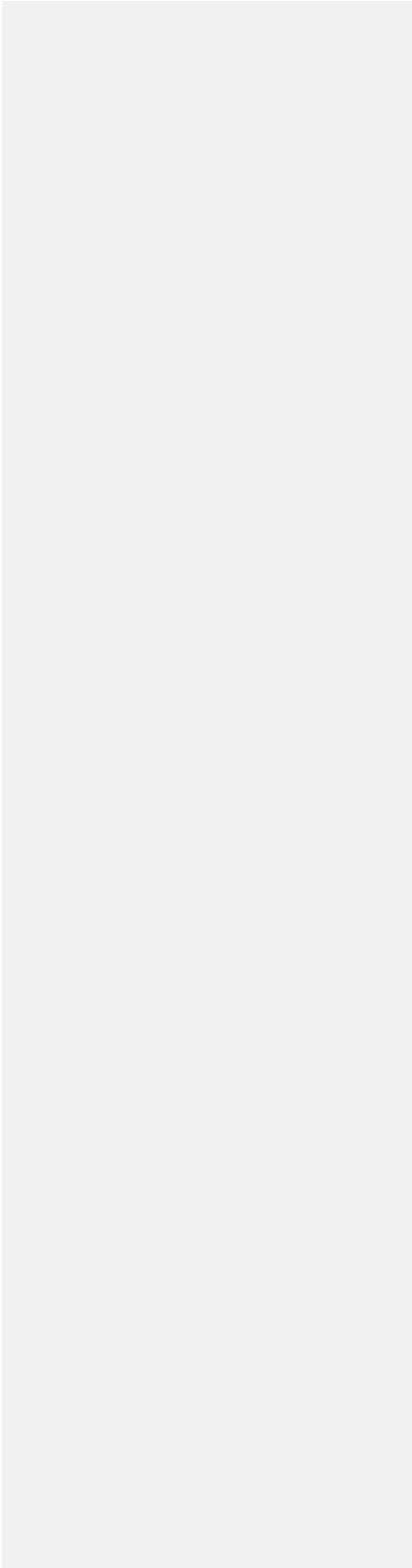
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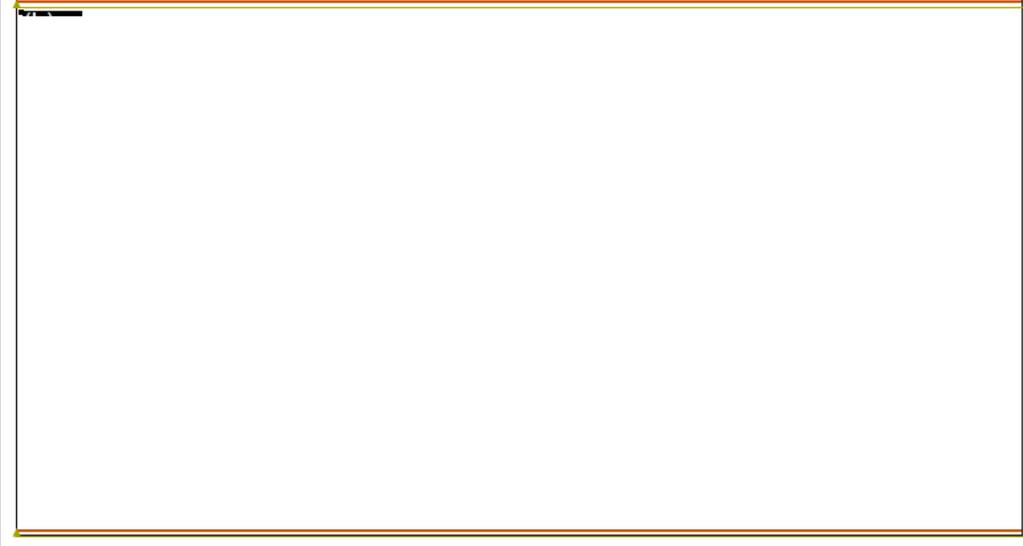
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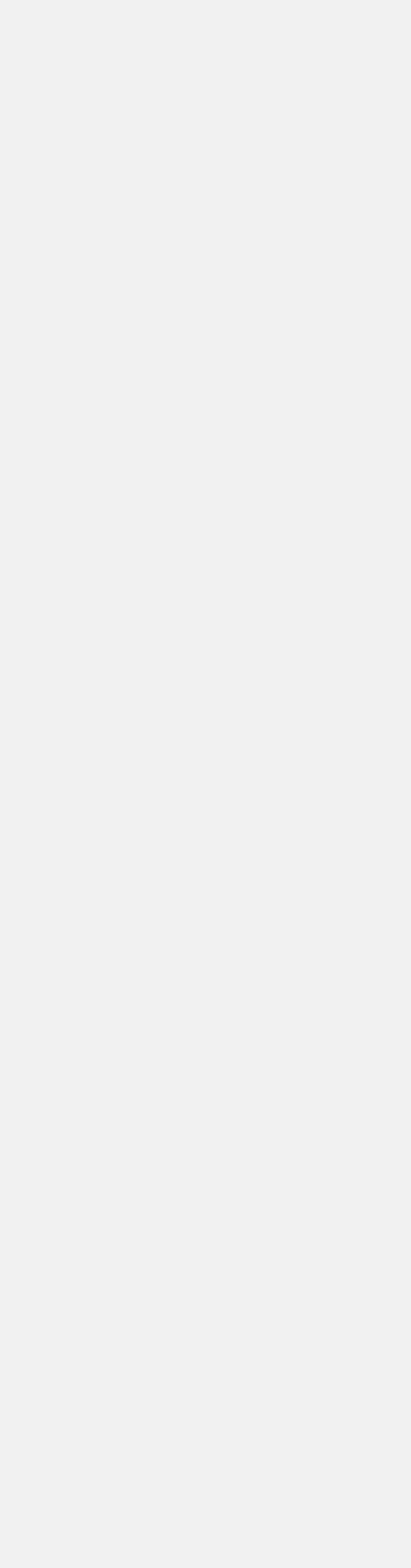


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National Park Service
U.S. Department of the Interior

Golden Gate National Recreation Area
Date: 11/22/2013

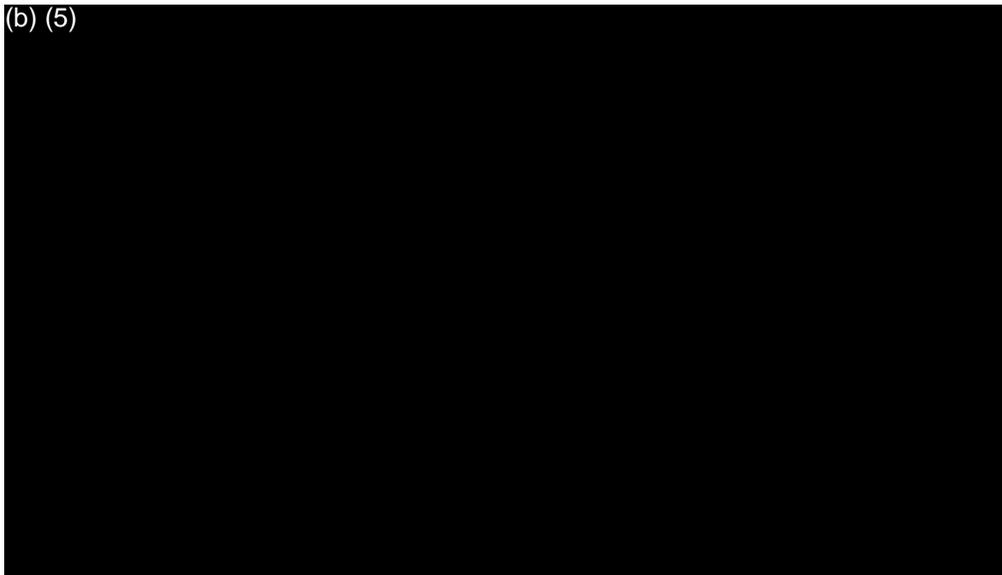
ATTACHMENT A

Project Description And Environmental Screening Form

A. PROJECT INFORMATION

Park Name: Golden Gate National Recreation Area
Project Title: Interim Commercial Dog Walking Public Use Limit and Permit Requirement
PEPC Number: 46523
Project Location:
County, State: San Francisco and Marin Counties, California
Administrative
Record Location: Fort Mason, Bldg 201; San Francisco, CA 94123

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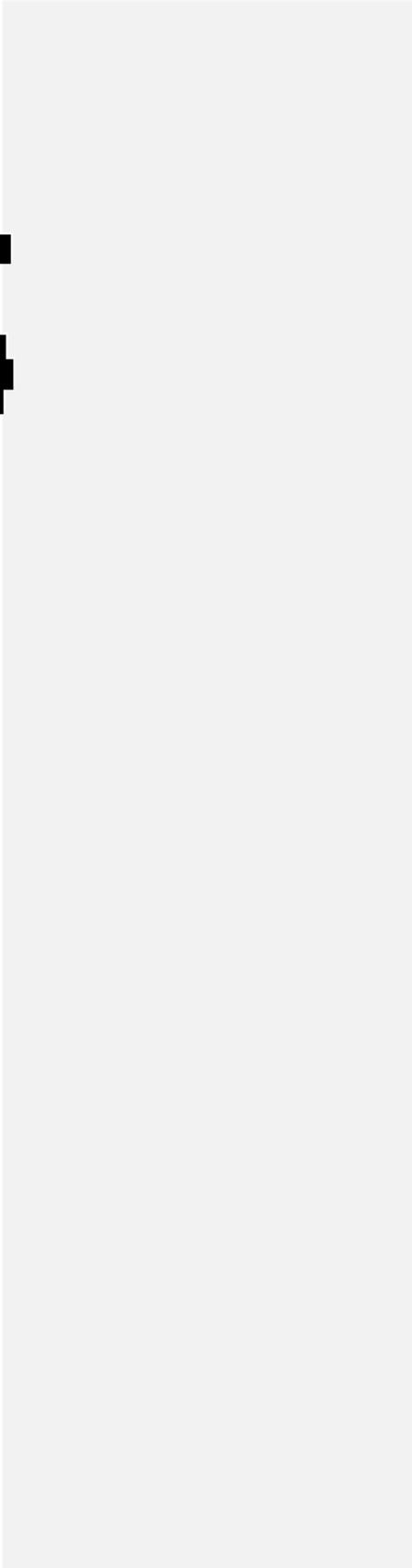
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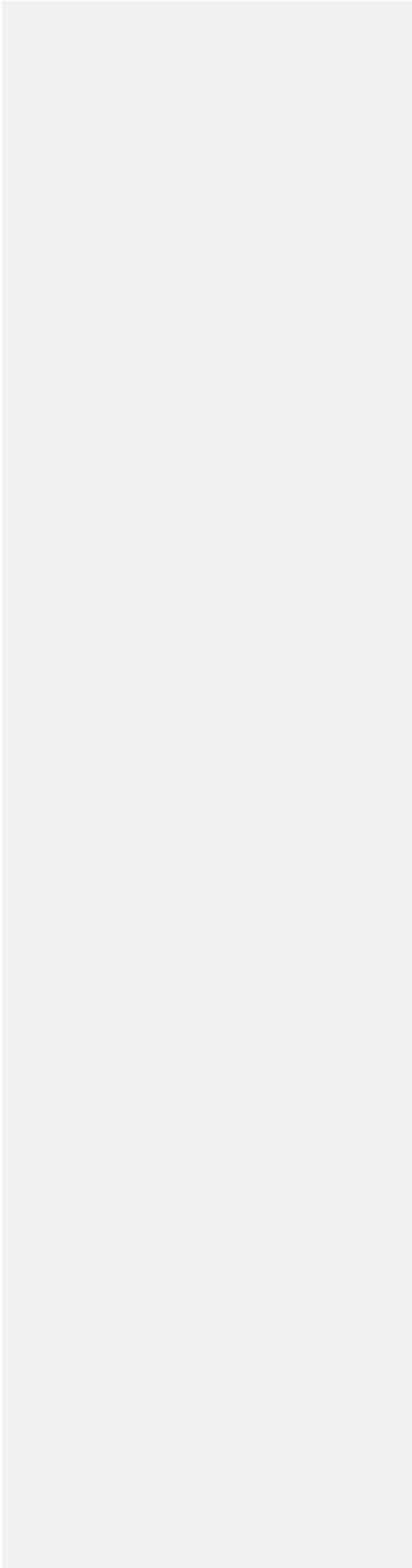
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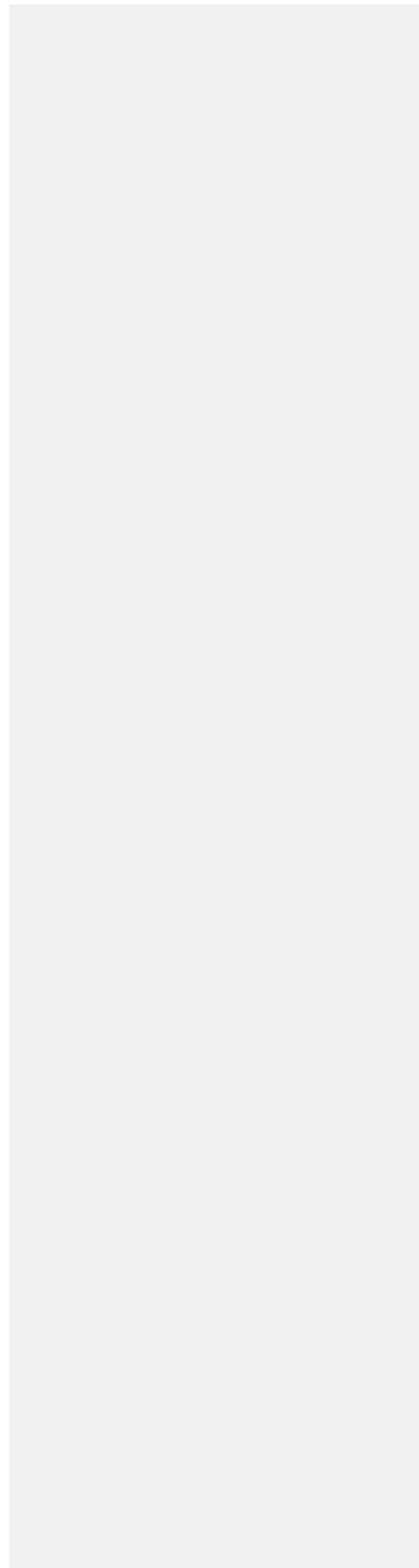
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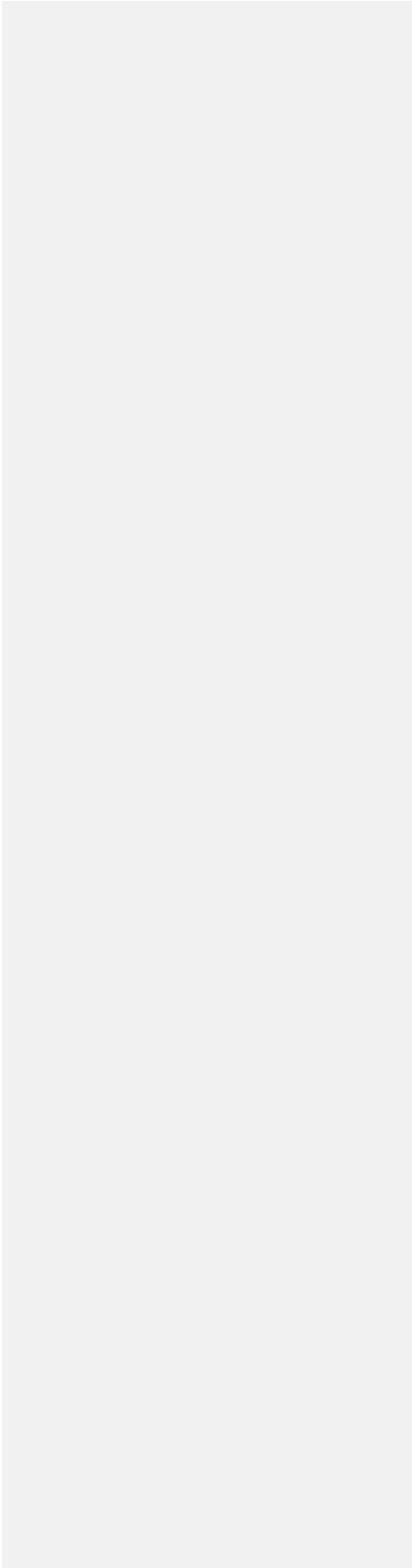
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National Park Service
U.S. Department of the Interior

Golden Gate National Recreation Area
Date: 11/22/2013

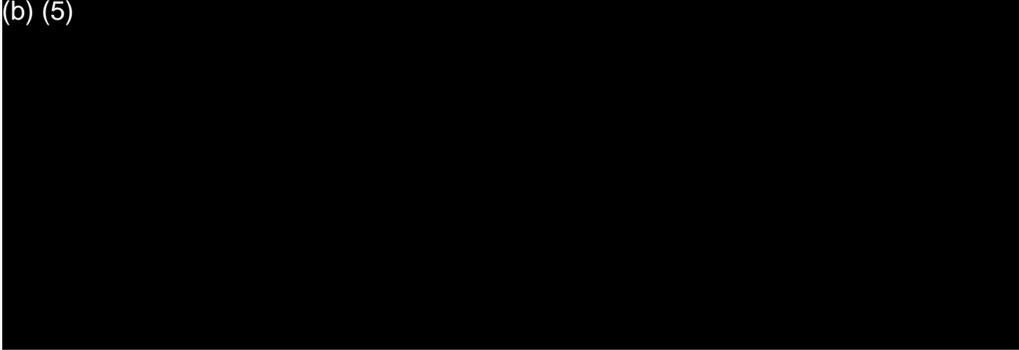
ATTACHMENT A

Project Description And Environmental Screening Form

A. PROJECT INFORMATION

Park Name: Golden Gate National Recreation Area
Project Title: Interim Commercial Dog Walking Public Use Limit and Permit System
PEPC Number: 46523
Project Location:
County, State: San Francisco and Marin Counties, California
Administrative
Record Location: Fort Mason, Bldg 201; San Francisco, CA 94123

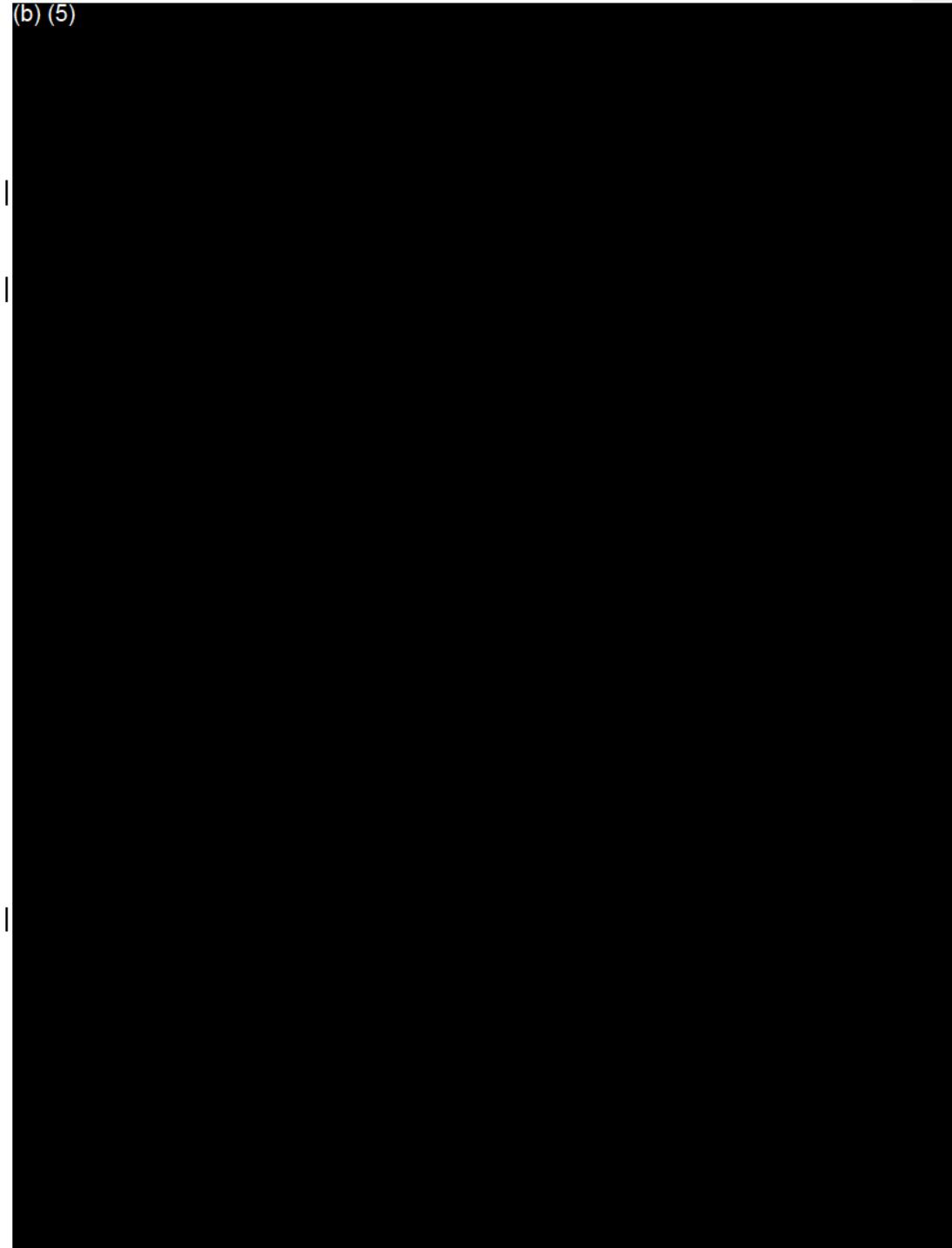
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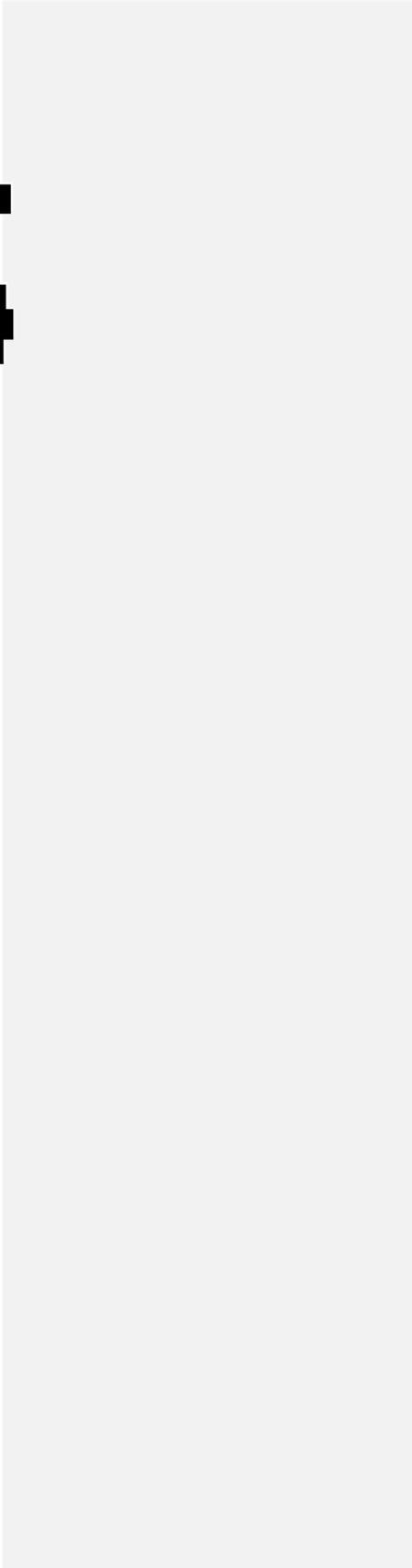
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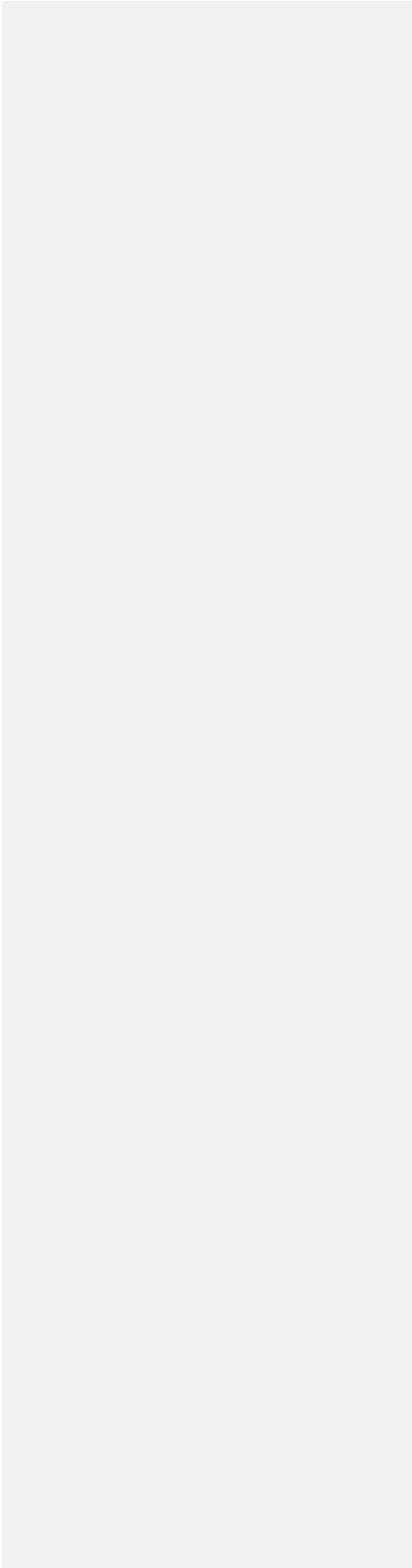


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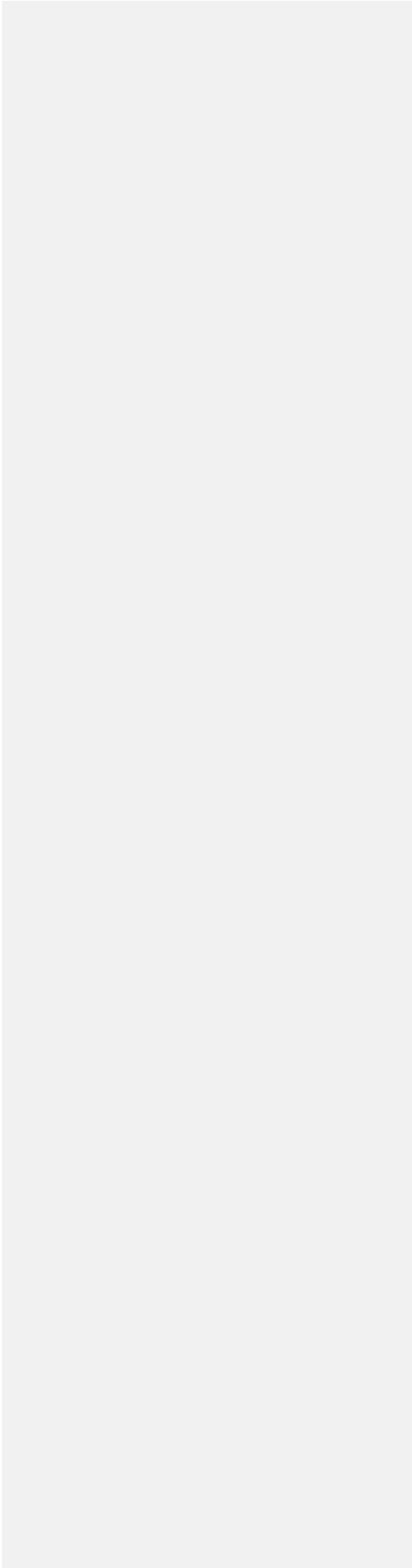
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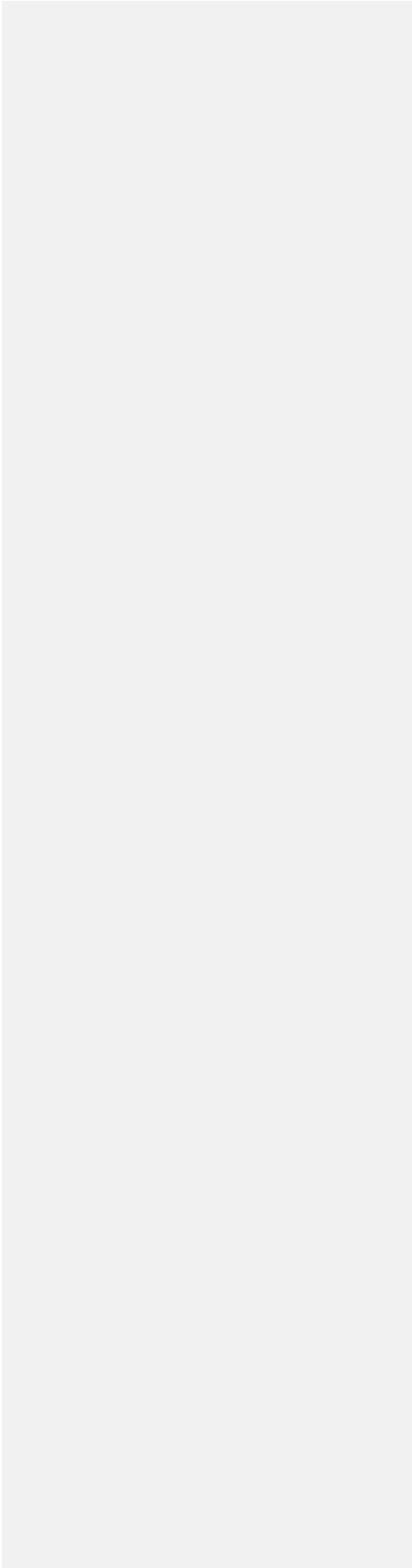


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National Park Service
U.S. Department of the Interior

Golden Gate National Recreation Area
Date: 11/22/2013

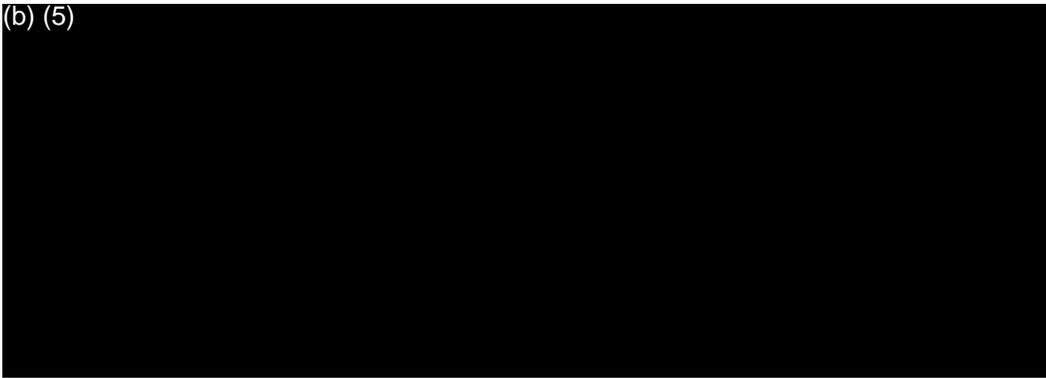
ATTACHMENT A

Project Description And Environmental Screening Form

A. PROJECT INFORMATION

Park Name: Golden Gate National Recreation Area
Project Title: Interim Commercial Dog Walking Public Use Limit and Permit System
PEPC Number: 46523
Project Location:
County, State: San Francisco and Marin Counties, California
Administrative
Record Location: Fort Mason, Bldg 201; San Francisco, CA 94123

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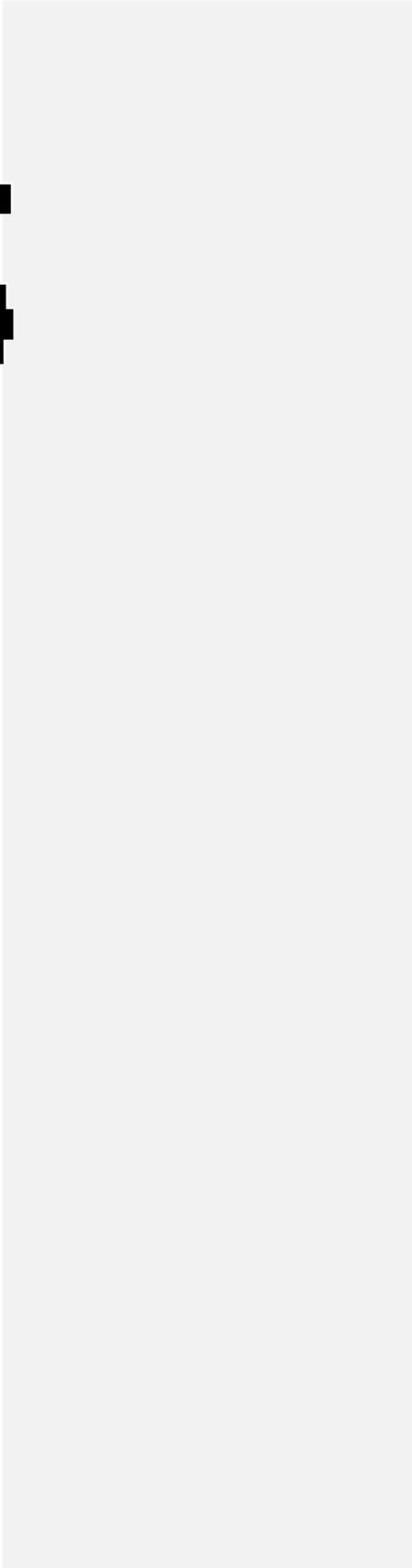
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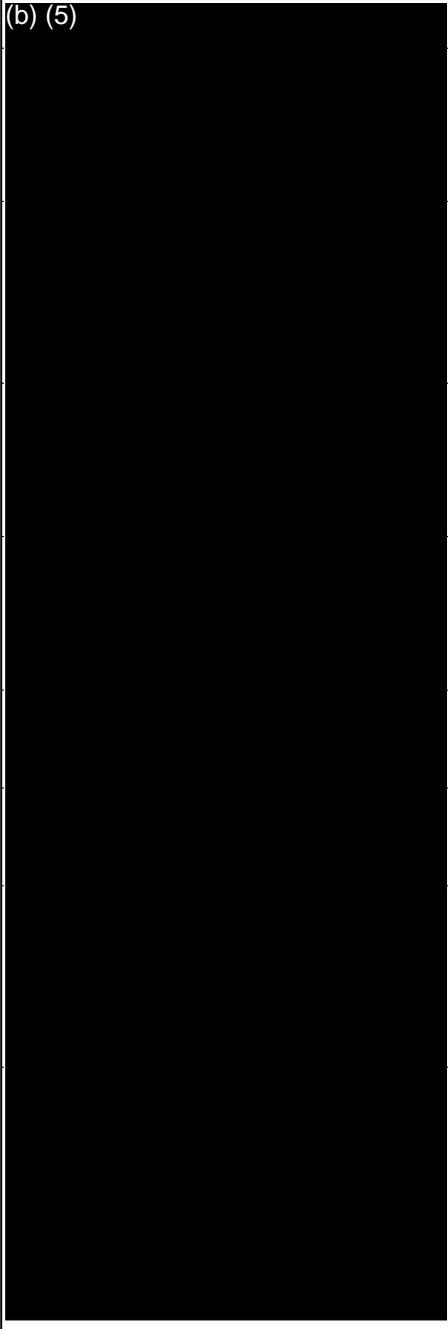
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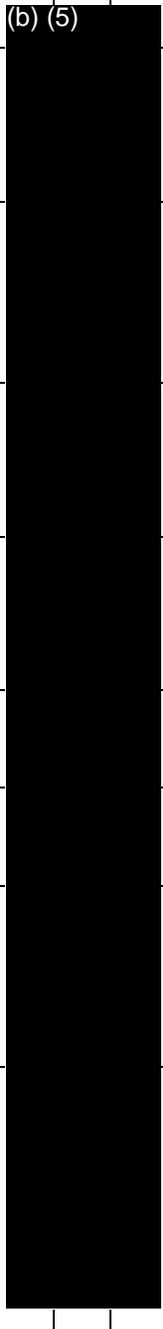
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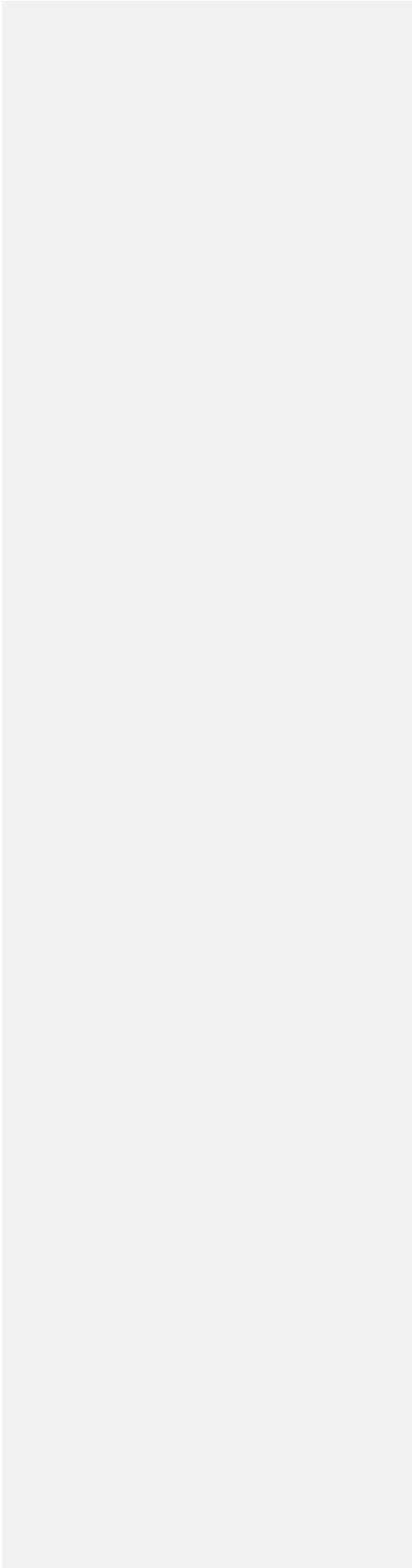
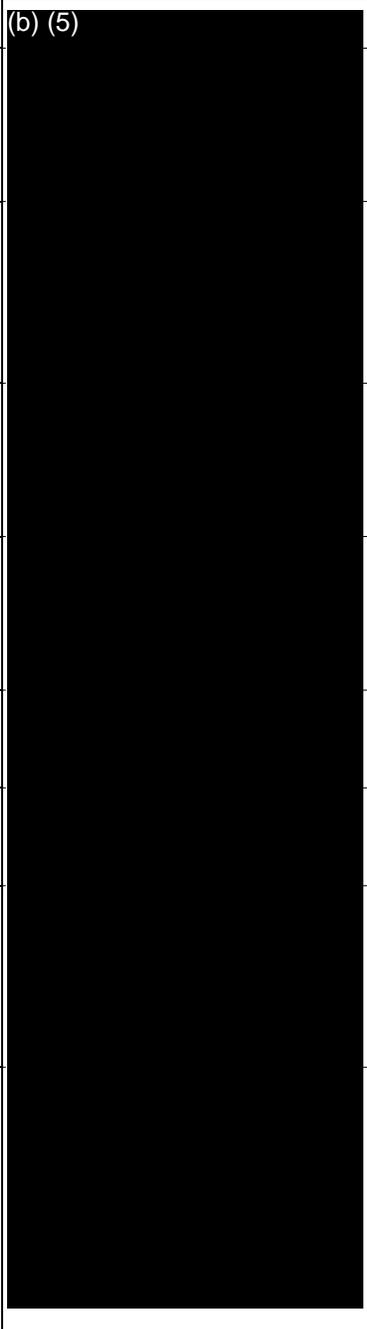
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National Park Service
U.S. Department of the Interior

Golden Gate National Recreation Area
Date: 11/24/2013

Interim Commercial Dog Walking Public Use Limit and Permit System

A. PROJECT INFORMATION

Park Name:	Golden Gate National Recreation Area
Project Title:	Interim Commercial Dog Walking Public Use Limit and Permit System
PEPC Project Number:	46523
Project Location:	
County, State:	San Francisco, California
County, State:	Marin, California
Administrative Record Location:	Fort Mason, Bldg 201; San Francisco, CA 94123

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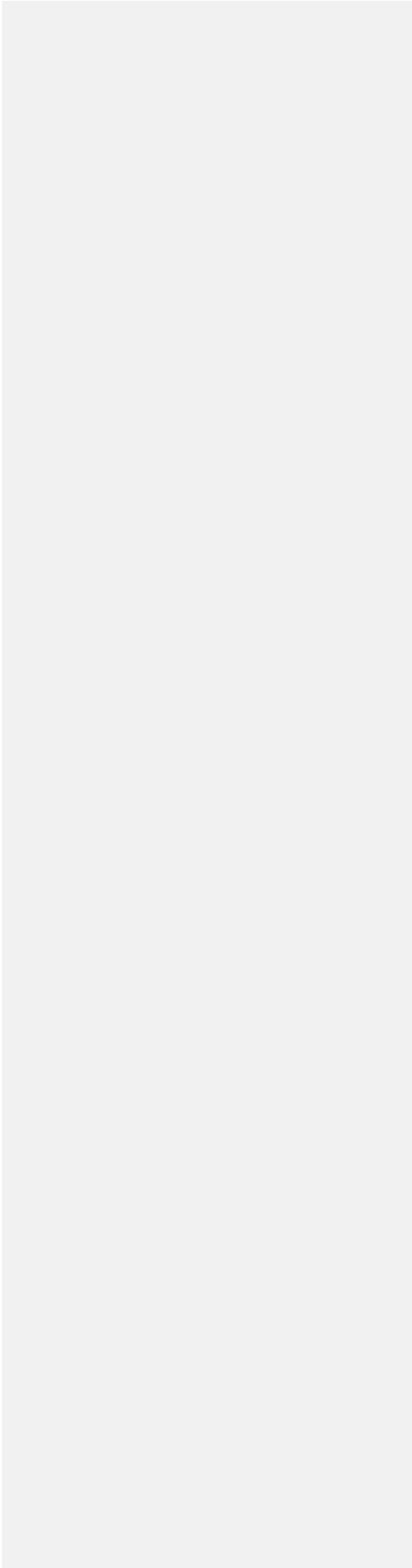
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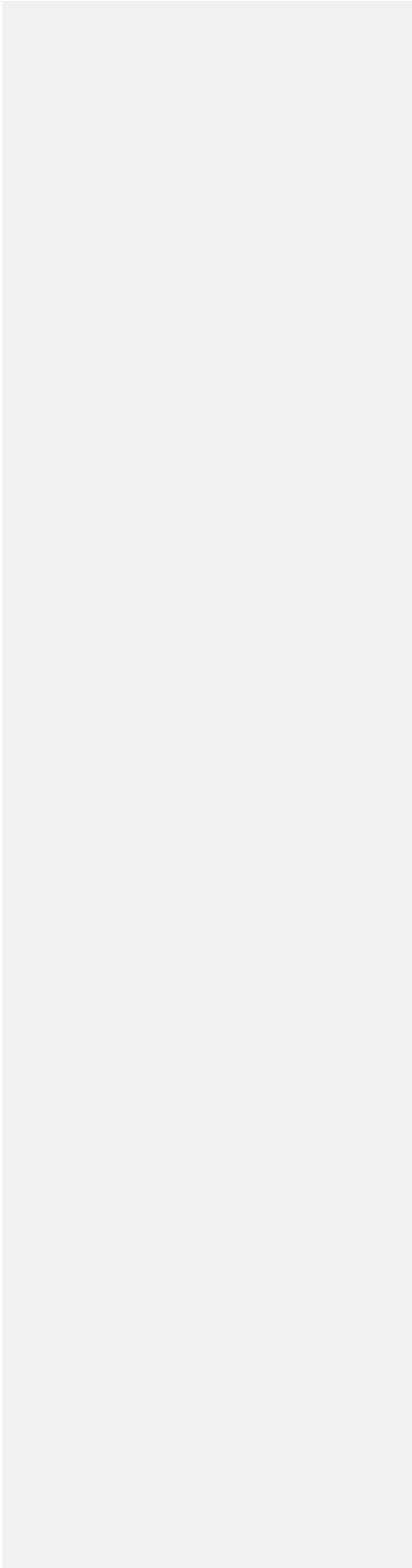
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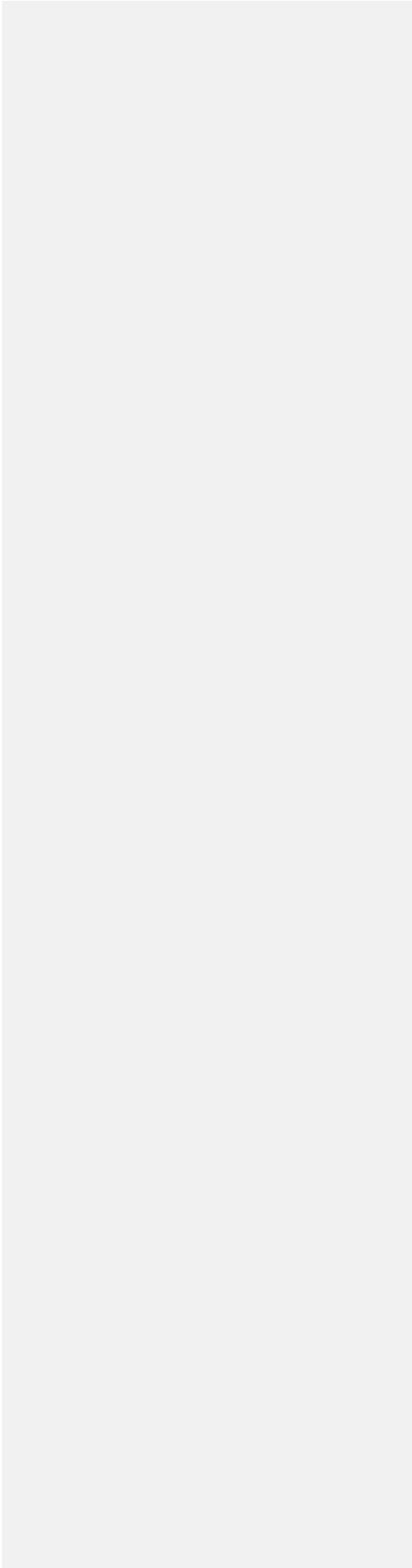
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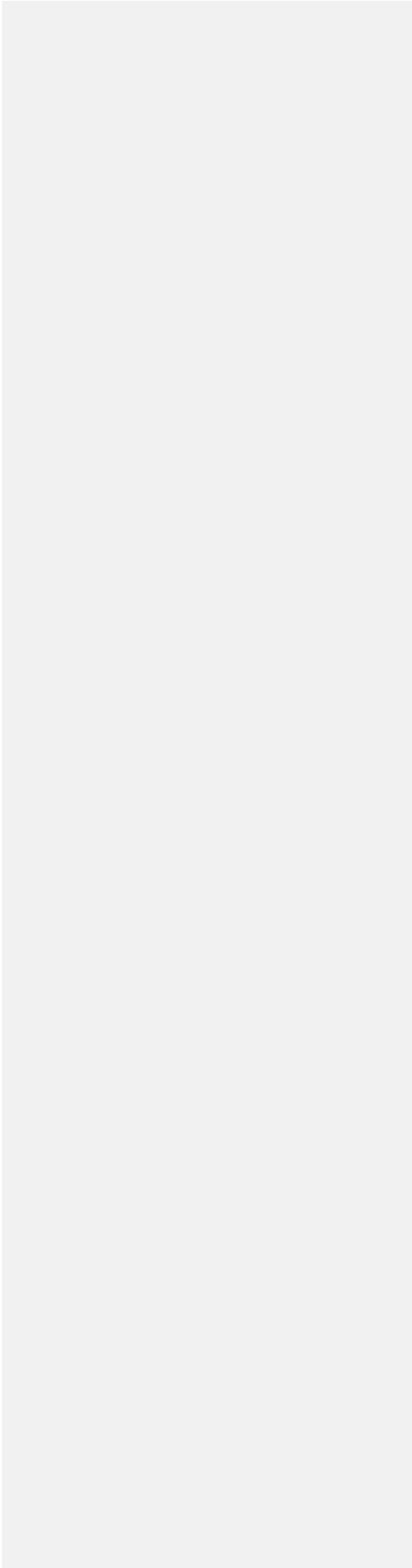


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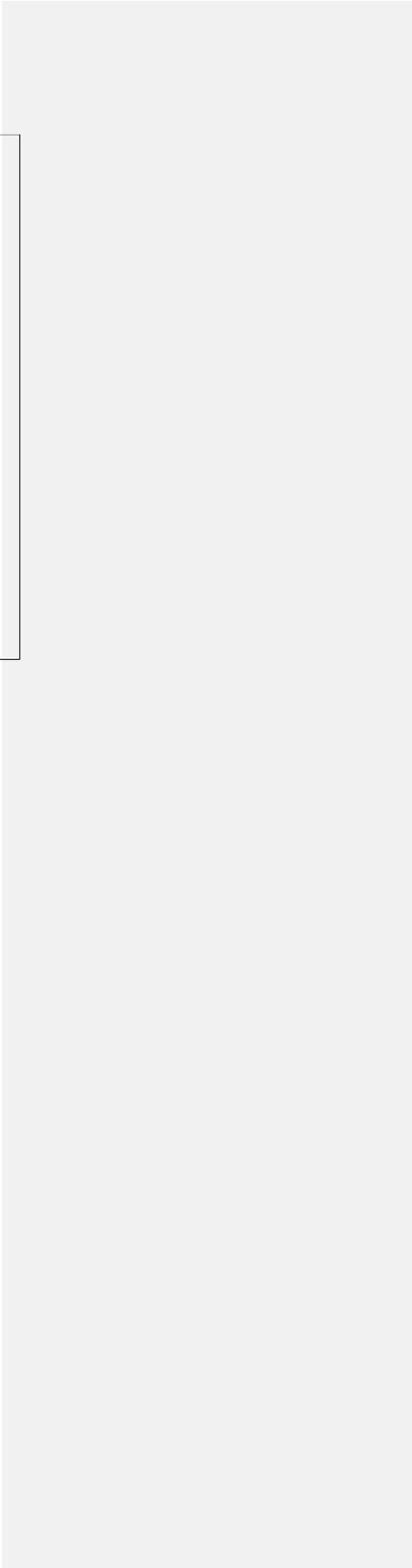
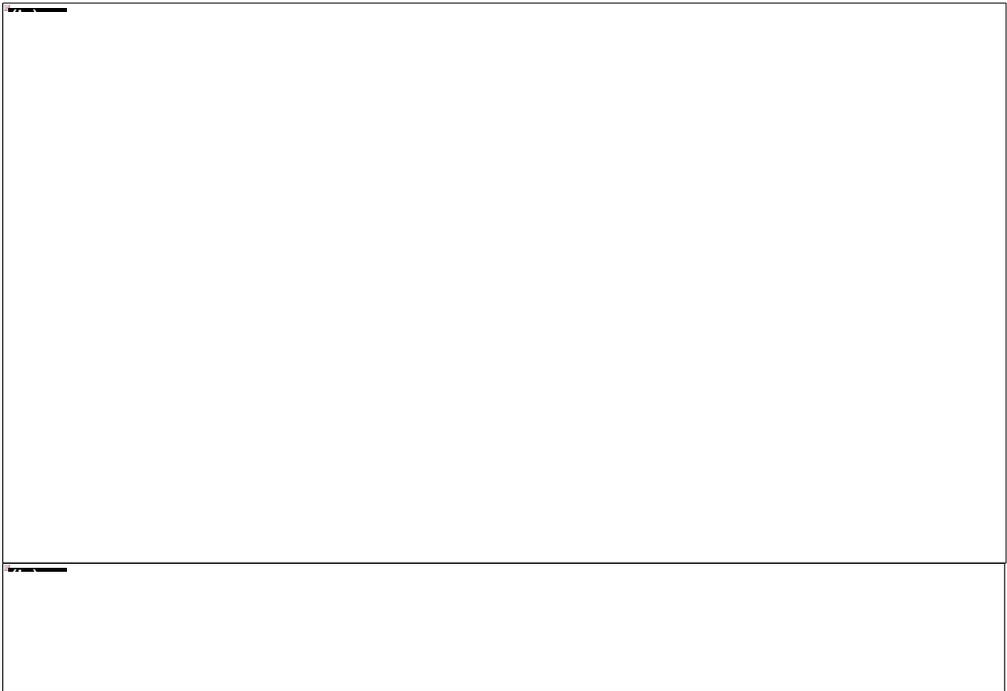


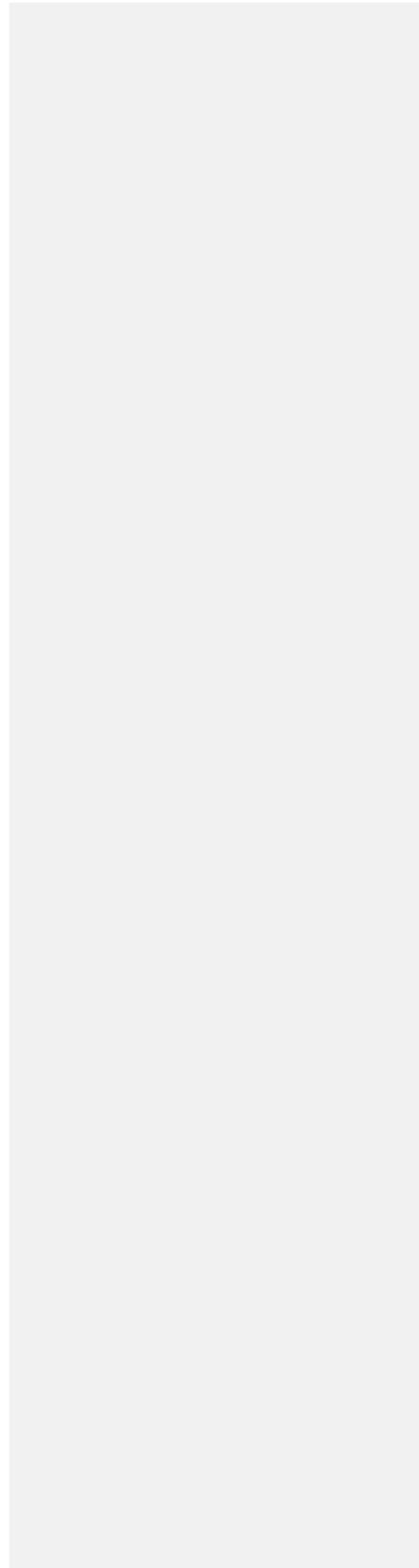
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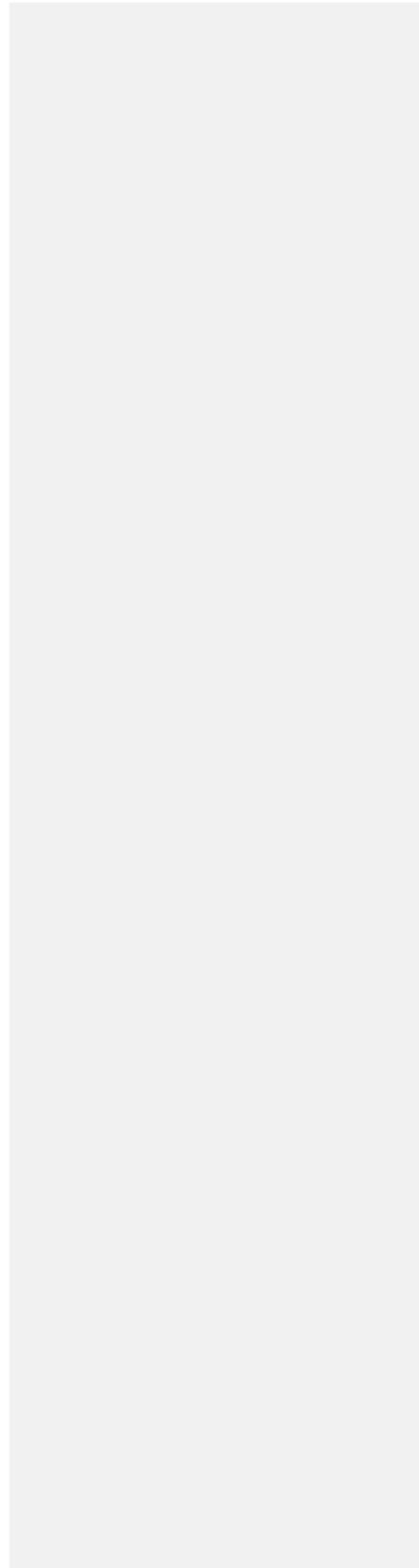
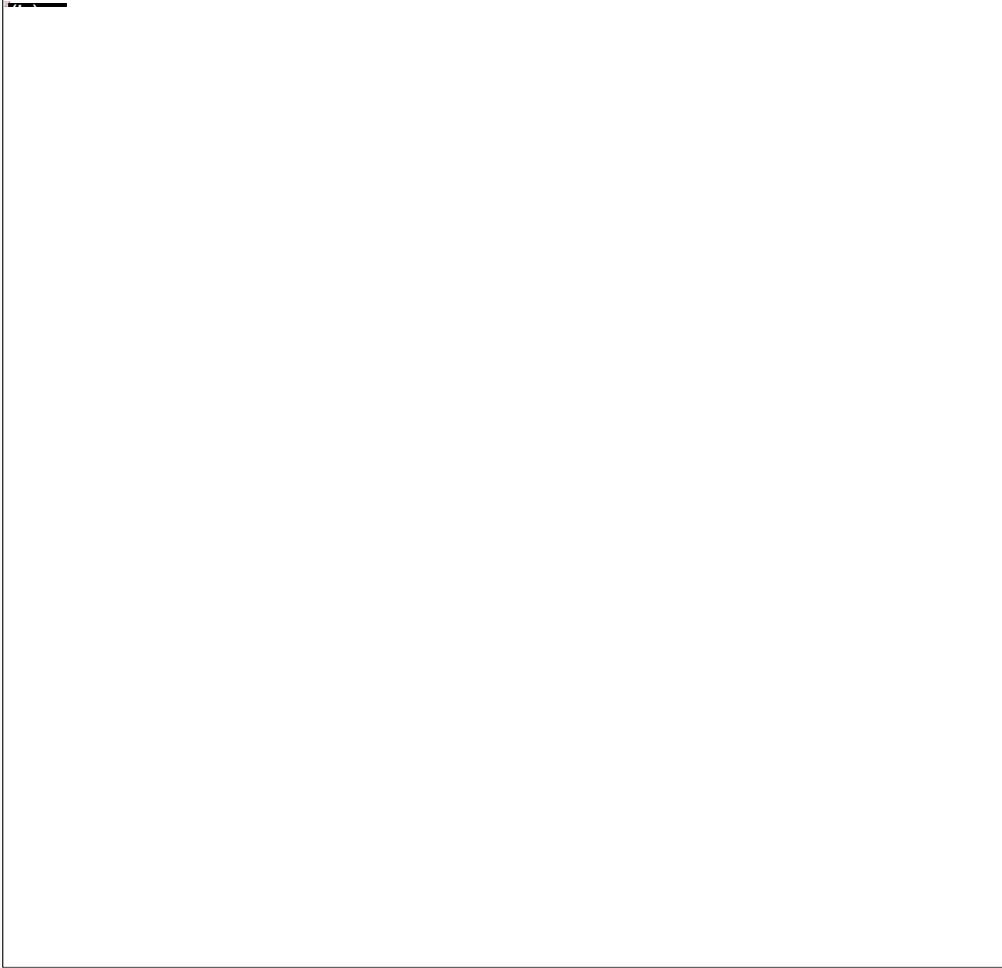
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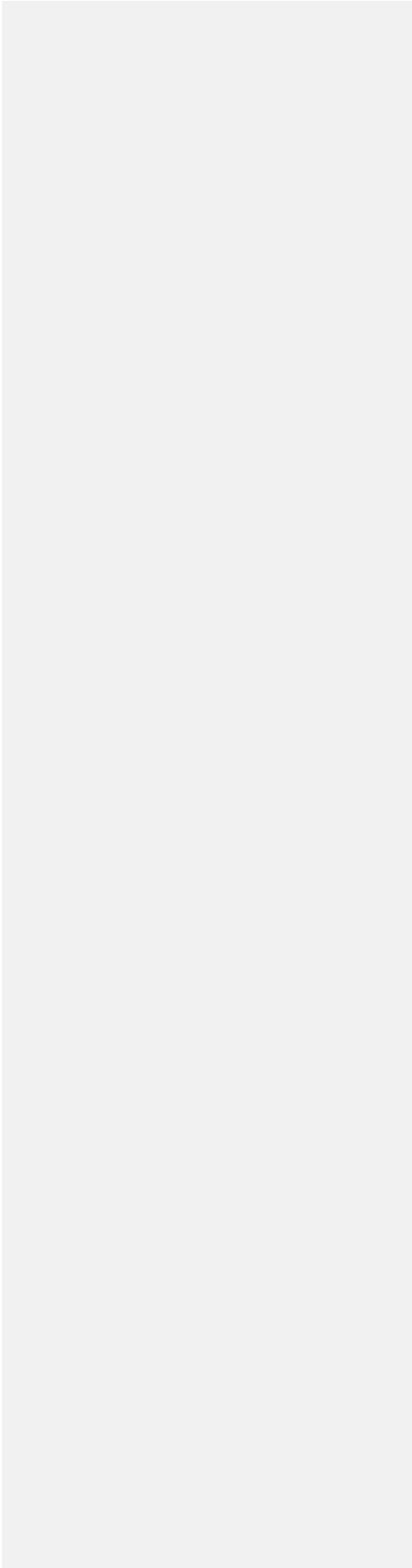
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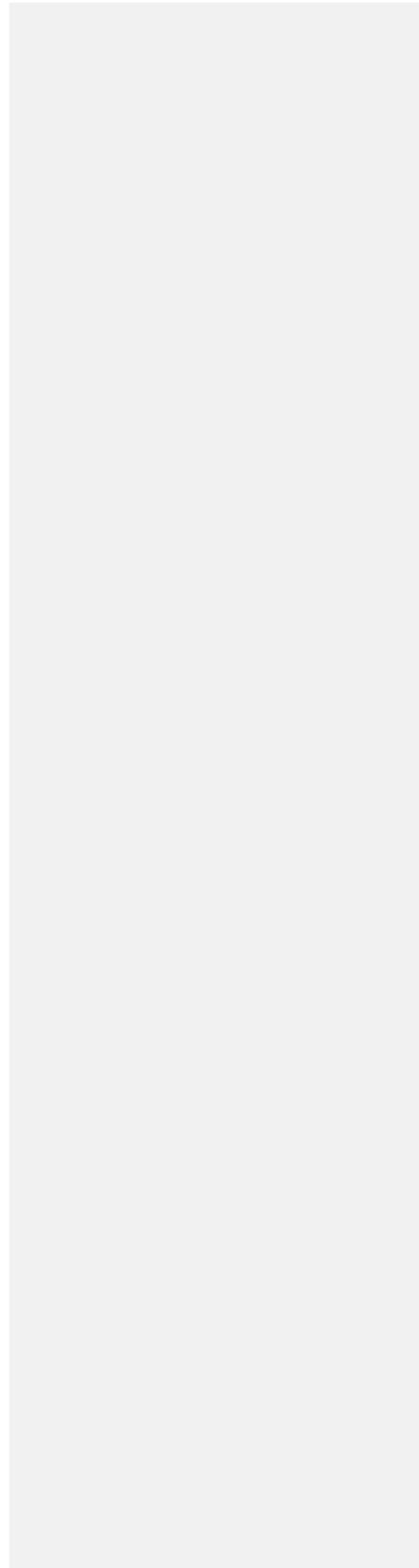
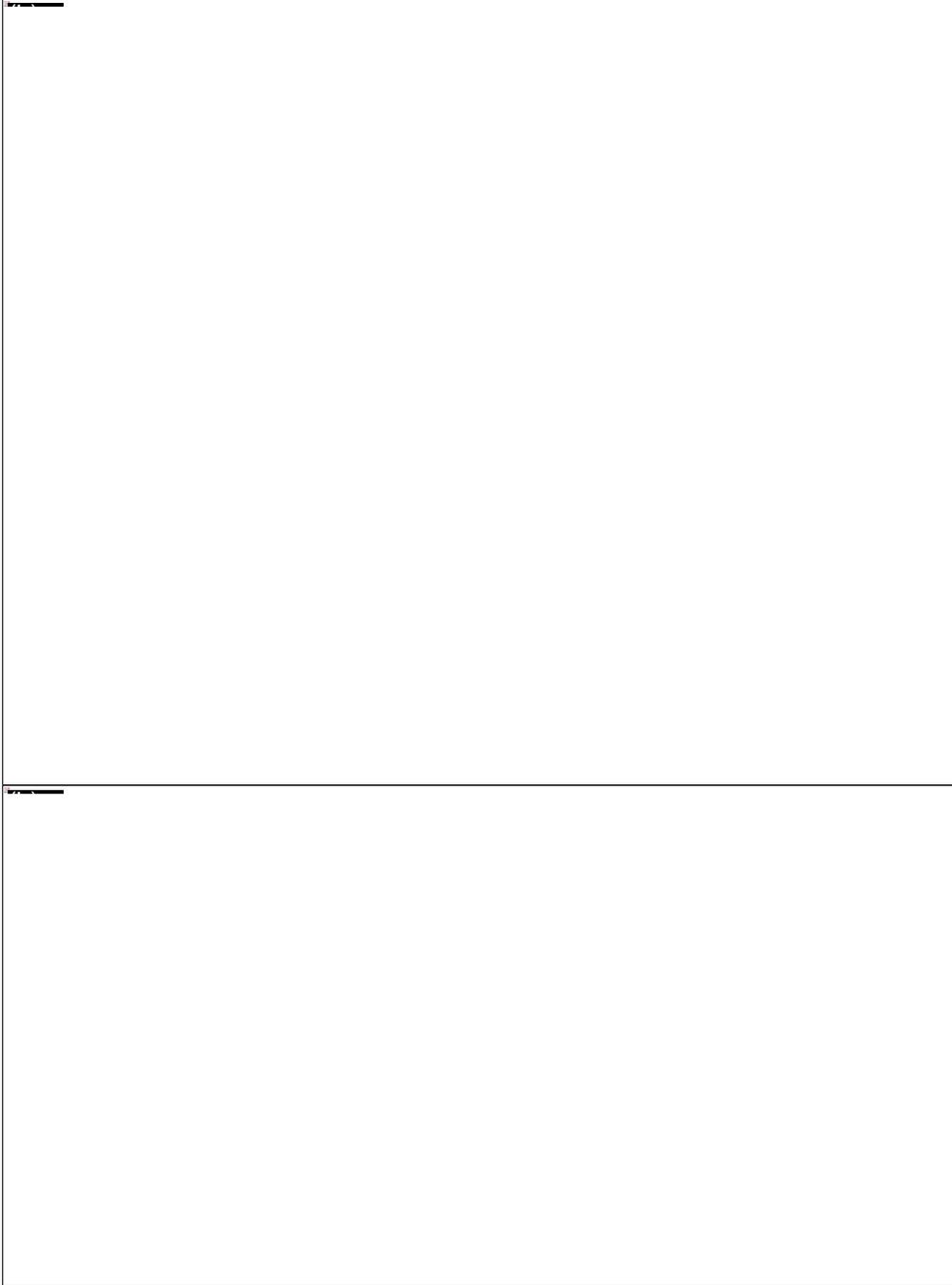
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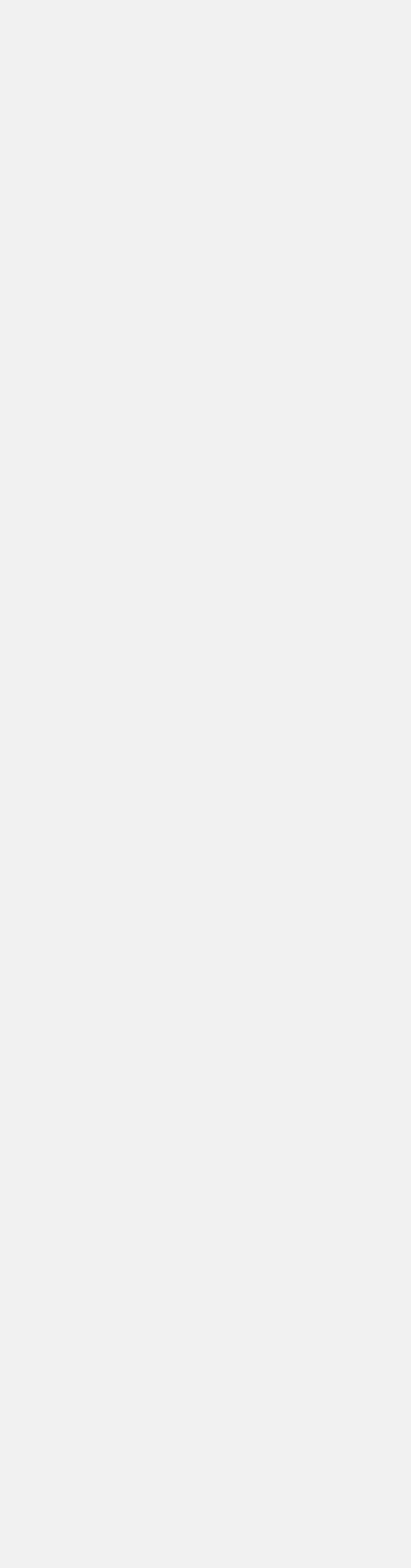




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Update: May 30, 2013

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

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

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

Public Reaction to Proposed Use Limit

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

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

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

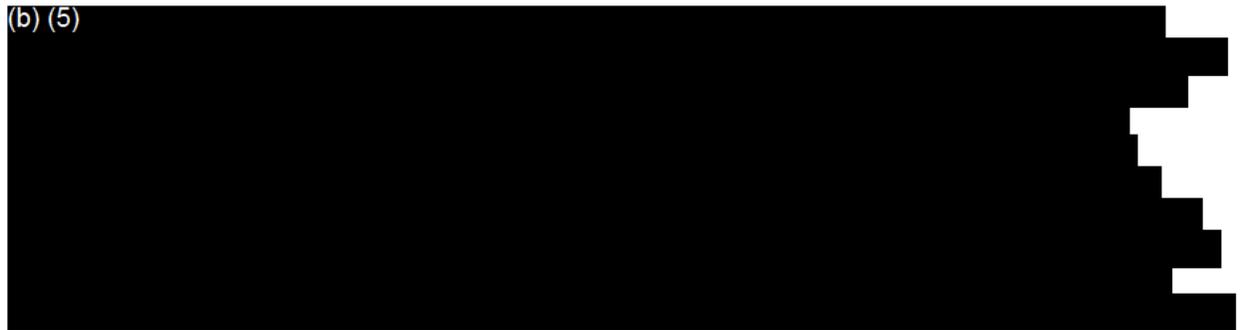
National Park Service Letter

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Trust Decision

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

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

For Further Information Contact

Interim Compendium Amendment

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11/21/13 - Shirwin

Decision Making Process – CDW (Draft Not For Public Distribution)

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United States Department of the Interior

National Park Service
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94133

Form 10-114
Rev Jan 00

SPECIAL USE PERMIT

Name of Use: *Commercial Dog Walking*

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

Name Of Area:
Long Term X
Short Term

NAME
ADDRESS
PHONE
EMAIL

NATIONAL
PARK
SERVICE

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Permittee: _____
Signature Organization Date

Authorizing Official: _____

Signature

Title

Date

GENERAL CONDITIONS

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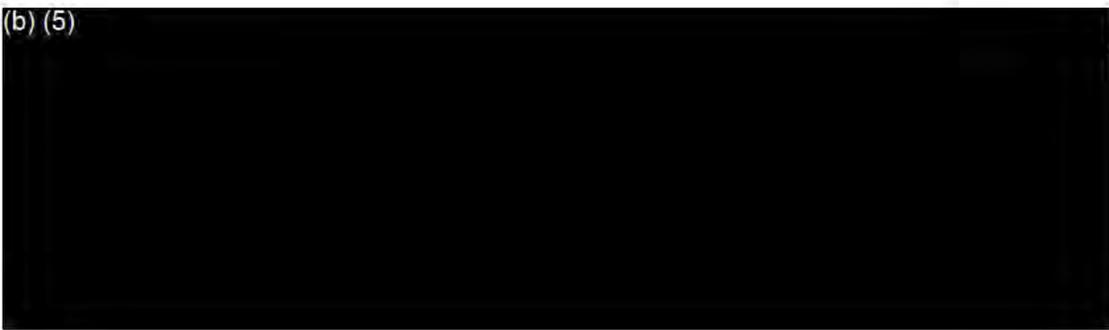
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Shirwin Thanks
much! Jon

Draft GOGA Comment Letter re: Presidio Trust's proposed rule to regulate commercial dog walking

Golden Gate National Recreation Area has reviewed the Presidio Trust's proposed regulation on commercial dog walking in Area B of the Presidio. We understand that the Presidio Trust is taking this action in response to San Francisco's commercial dog walking ordinance, passed last year by the San Francisco Board of Supervisors, which will require a permit for four to eight dogs, liability insurance and training. We share the Trust's concern that without protective action by the Presidio Trust, commercial dog walkers may relocate to Trust lands where commercial dog walking is currently not regulated. This potential redistribution could impact the Presidio Trust's mandate to preserve and protect the park's resources.

However, while we support the Presidio Trust's effort to manage this special use, because we share a boundary with the lands managed by the Presidio Trust, we urge the Trust to adopt a maximum limit of six dogs per dog walker, consistent with the limits specified in the alternatives that permit commercial dog walking in our draft Dog Management Plan/EIS.

As you know, the park is intensively developing a draft Dog Management Plan/EIS (Plan/EIS). That document includes a range of alternatives that address commercial dog walking - from setting a limit of three dogs, to a limit of six dogs with a permit required, to prohibiting commercial dog walking altogether. During development of the draft Plan/EIS, NPS carefully considered allowing more than six dogs for commercial and private dog walkers, but dismissed this as a reasonable alternative because it did not comport with resource protection and visitor experience and safety, key objectives of the Plan/EIS.

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In determining a threshold number, NPS also sought consistency with adjacent jurisdictions, since a consistent number would be easier to understand and to enforce - two additional draft Plan/EIS objectives. We evaluated the management actions of local and other government entities that have addressed this issue. Two local entities, Marin County Open Space District and the East Bay Regional Park District, limit numbers to six dogs per dog walker. The majority of agencies surveyed outside the San Francisco Bay Area also limit the number of dogs for commercial walkers to no more than six. These agencies include the City of Boulder Open Space and Mountain Parks, a Colorado agency that pioneered comprehensive dog management planning. The City of San Francisco, with an ordinance allowing up to eight dogs per commercial dog walker in its parks, is an outlier among jurisdictions around the country. Jurisdictions with a primary resource protection and recreation mandate universally settled on six as the maximum number.

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We received many public comments on the draft Plan/DEIS regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the number at six dogs with strict guidelines. Other commenters, including some dog walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker (commercial or private). Some noted that four or more dogs could be hard to control. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of dogs to a maximum of six. A number of commenters requested that commercial dog walking not be allowed at all.

We are very concerned that dog walkers could not consistently control more than six dogs under voice and sight control, particularly in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. We were unable to find literature supporting the idea that more than six dogs would not damage park resources or impact visitor

experience and safety, or put another way, would provide both resource protection and visitor experience and safety. Based on public comment, feedback from the discussions of the Negotiated Rulemaking Committee for dog management, park staff observations and research, and law enforcement experience, we believe that allowing more than three dogs without a permit system, or more than six dogs total under a permit system could severely impact visitor experience and safety, and would not meet the purpose of and need for the Plan/EIS

Along with Presidio Trust, we are similarly concerned about the possible effects of the city's action on park lands, users and resources. Given that the park's Dog Management Plan, final EIS, and final rule are not expected to be completed until 2015, the combined actions of the City and the Trust, should they adopt the city's regulation, will likely cause a redistribution of commercial dog walkers to the park's lands. As a result, the park is now considering enacting an interim commercial dog walking permit system that would be in place only until the Dog Management Plan/EIS is finalized, and a final rule promulgated. The interim permit would include a limit of six dogs per dog walker, based on information gained in development of the draft Plan/EIS.

In summary, Golden Gate National Recreation Area supports the Presidio Trust's effort to manage the special use, but urges adoption of a lower initial permit limit in their proposed regulation, given the Presidio's presence within the boundaries of a national park unit. We would further encourage the Trust to consider adopting the park's interim permit system, should it be implemented, on either an interim basis or as part of the Trust's final rule. (b) (5)

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A combined Presidio Trust-NPS approach to commercial dog walking would provide a consistent approach on federal park lands by sister agencies, and equally important, be more likely to fulfill our joint resource protection and visitor experience mandates.

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8/1/2013

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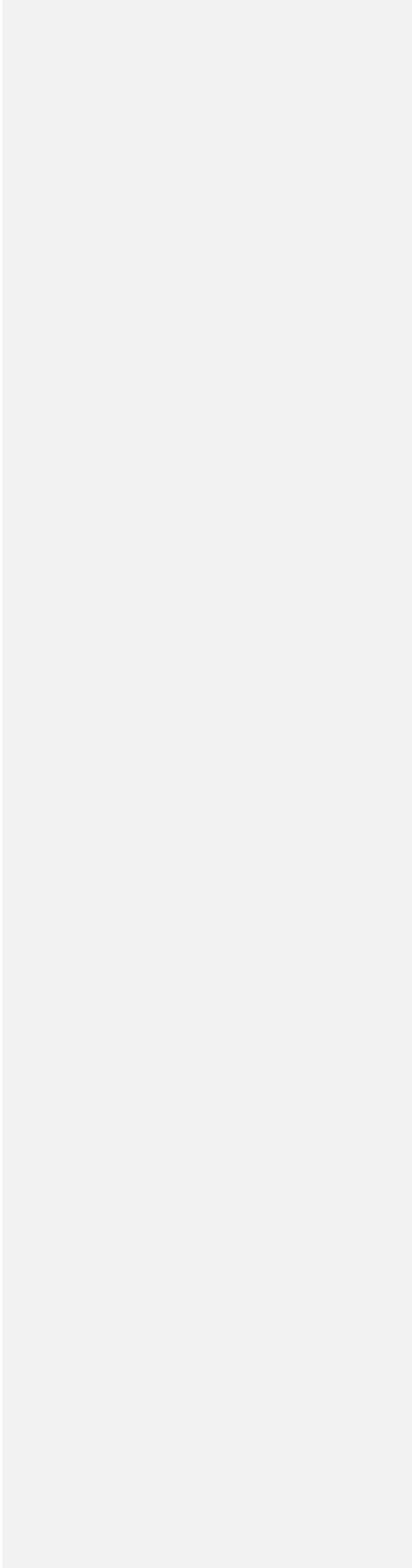
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