

Appendix G: Law Enforcement Data

Analysis of Law Enforcement Data within Golden Gate National Recreation Area

Table of Contents

Section 1 Introduction

Section 2 Methodology

Appendix A Graphs of LE Data Analysis for All Incident Types Together

Appendix B Graphs of LE Report Analysis for All Dog Related Incidents

1 Introduction

The National Park Service is currently preparing a dog management plan and Environmental Impact Statement (EIS). Law enforcement (LE) data is being analyzed to provide a tool to aid in alternatives development and impacts analysis.

2 Methodology

This section describes the methods used to take existing data provided by GGNRA LE and analyze this data in order to gain a basic understanding of the types of incidents that have occurred.

For the purpose of this analysis, a distinction is made between the terms “incident” and “violation.” “Incident” refers to any occurrence that required a response by LE officers. These are associated with a specific case number. “Violation” refers to “incidents” for which LE officers issued either a citation or warning corresponding to a CFR violation.”

For the years of 2001-2011, annual summary databases were provided by GGNRA which included columns for the following applicable data: Case #, Time, Date, Incident/Offense, Description of Location, Officer Name, and day of week (DOW). The Case # corresponds to the number on the official incident report. The time indicates the time that the incident occurred. The date indicates the date that the incident occurred. The Incident/Offense indicates the general category that the incident falls under. Note that there is often more than one category listed here. The Description of Location provides the general area in which the incident occurred. The Officer Name indicates the LE officer responsible for writing the incident report.

Section 2.1 below describes phase 1 of the analysis, which examined total incident reports by type in both GGNRA as a whole, and in each individual area. Section 2.2 below reviewed individual incident reports for dog related incidents only for the years of 2008-2011. Copies of incident reports for prior years were unavailable (disposed following NPS guidance for records disposal). Some of these reports documented multiple incidents. These are accounted for in the analysis. As a result, there are variations in the total number of incidents for the first (*section 2.1*) and second (*section 2.2*) parts of the analysis.

2.1 Analysis of All LE Data

The first phase of the analysis examined total numbers of incident reports by type in both GGNRA as a whole, as well as in each individual area. Results are given as a percentage of total incidents (*Attachment A*).

LE annual summary incident databases for 2001-2005, 2006-2010, and 2011 were obtained. For all years, the annual incident databases were edited to remove all incidents that did not occur on GGNRA land or which were administrative in nature (e.g. reports documenting overtime, radio issues, alarm off, maintenance needed) rather than reports of incidents or injuries involving visitors or staff. Incident

entries were placed into simplified incident categories to reflect the overarching incident types occurring within GGNRA. Incidents were then sorted by incident categories. A percentage for each incident category was obtained for GGNRA as a whole (# specified incident type/total incidents) for each of the 11 years of the analysis. Incident categories for which the percentage was <5% were lumped into the “Other” category for presentation. Graphs were produced to reflect this analysis for GGNRA as a whole. The total number of incidents is included on each graph for a better understanding of what the percentages represent. The graphs for all 11 years were compiled into one document to visualize the changes in incident occurrence in GGNRA over time.

Incidents were then sorted by the area within GGNRA where they occurred. A percentage for each incident category was obtained for each area within GGNRA (# specified incident type in a specified area/total incidents in that specified area) for each of the 11 years of analysis. Incident categories for which the percentage was <5% were lumped into the “Other” category for presentation. Graphs were produced to reflect this analysis for each area within GGNRA. The total number of incidents within each area is included on each graph for a better understanding of what the percentages represent. If the “Dog” category fell into the “Other” category for a given area for a given year, then the “Dog” incident percentage is included in the graph heading. If there were no “Dog” incidents for a given area for a given year, then this is specified in the graph heading. The graphs for each area for all 11 years were compiled into one document to visualize the changes in incident occurrence for each area over time.

2.2 Analysis of LE Data for Dog Related Incidents

The next phase of analysis began with a review of available incident reports. Incident reports for 2001-2006 were unavailable, as noted previously. Incident reports for 2007 were only available for part of that year and thus were not used.

Note again that the number of incidents in this section of the analysis does not match the number of incidents in the analysis of the overall LE data (which includes non-dog related incidents). This analysis is based on a review of each incident report; there were often multiple incidents per incident report. This was not done for the overall LE data analysis because individual incident reports were not reviewed for non-dog related incidents.

Spreadsheets for the 2008, 2009, 2010 and 2011 LE incident analysis (*section 2.1*) were copied into new databases. All non-dog incidents were deleted. A new column was created for “Violation/CFR Cite” with drop down menu options for each potential CFR violation. A new column was created for “Action Taken” which addressed whether the action taken was a “Citation,” “Warning” or “Other.” A new column was created to track additional notes that were pertinent to each Case # that related to dogs. Spreadsheets were sorted by Case #.

PDF copies of LE Incident reports in order by Case # for 2008-2011 were obtained from GGNRA for each of the four years available for analysis (2008, 2009, 2010, and 2011). Reports were reviewed individually to identify the CFR violations, if any, that occurred as well as the action, if any, that was taken. This was recorded in the databases in the appropriate columns. Notes were taken of other pertinent information

included in the reports such as circumstances where multiple violations, citations or warnings occurred within an individual report. If a given report was not available, then columns were filled out as follows. "Violation/CFR Cite" was labeled according to the "Incident/Offence" type stated on the incident report and entered into the LE database. If "Incident/Offence" listed only as a "Class 2" then "Violation/CFR Cite" was listed as "Other." A Class 2 offence is an incident where the reporting or involved parties were not located, thus no report was taken. For both of the above, "Action Taken" was listed as "Other." If a report included multiple incidents/violations, new rows were added to account for each individual incident. If a report detailed multiple incidents but did not enumerate, then 2 additional entries were created. All databases (2008, 2009, 2010 and 2011) were reviewed for consistency of classification.

Each of the databases (2008, 2009, 2010 and 2011) was copied into two new tabs: "ALL Areas Together" to analyze GGNRA as a whole, and "Sorted by Area" to analyze each area individually.

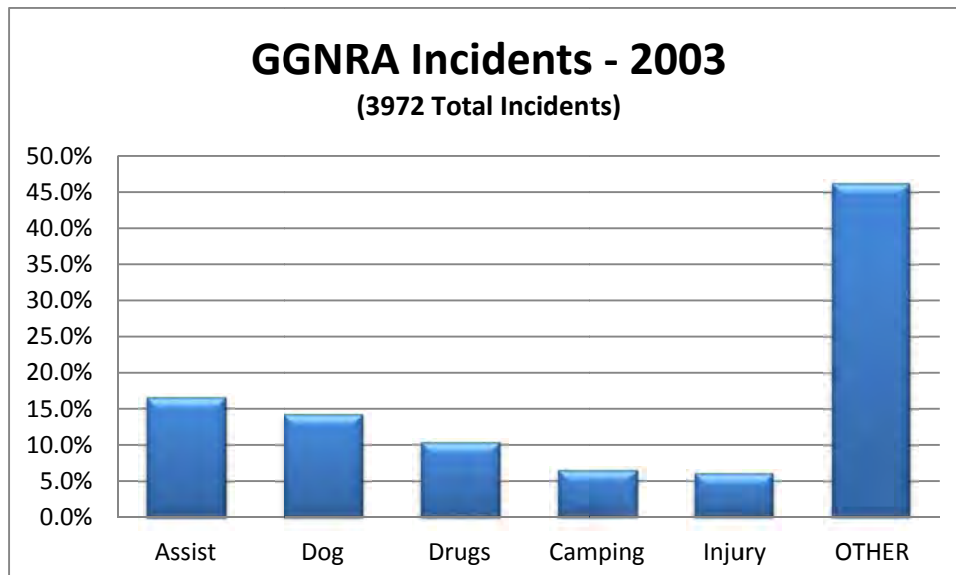
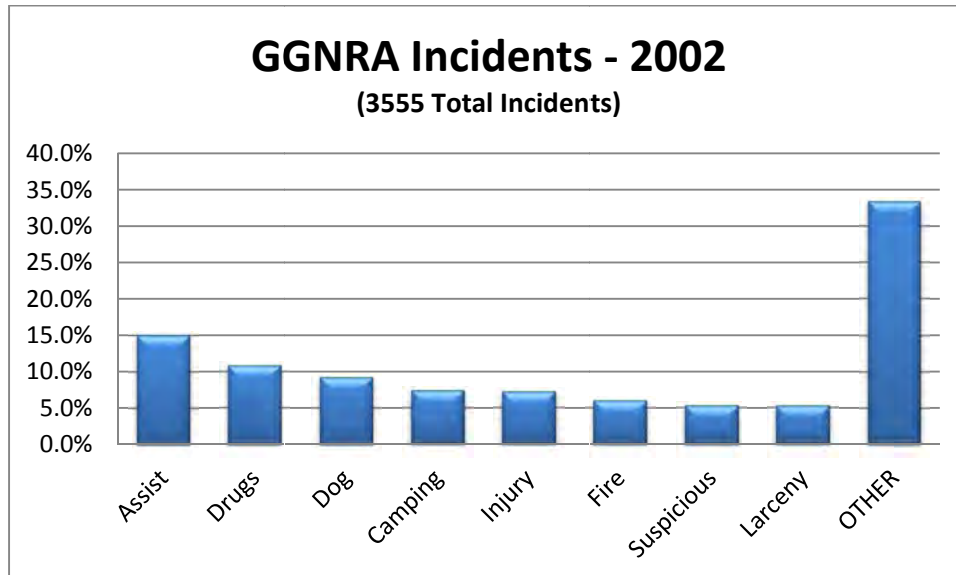
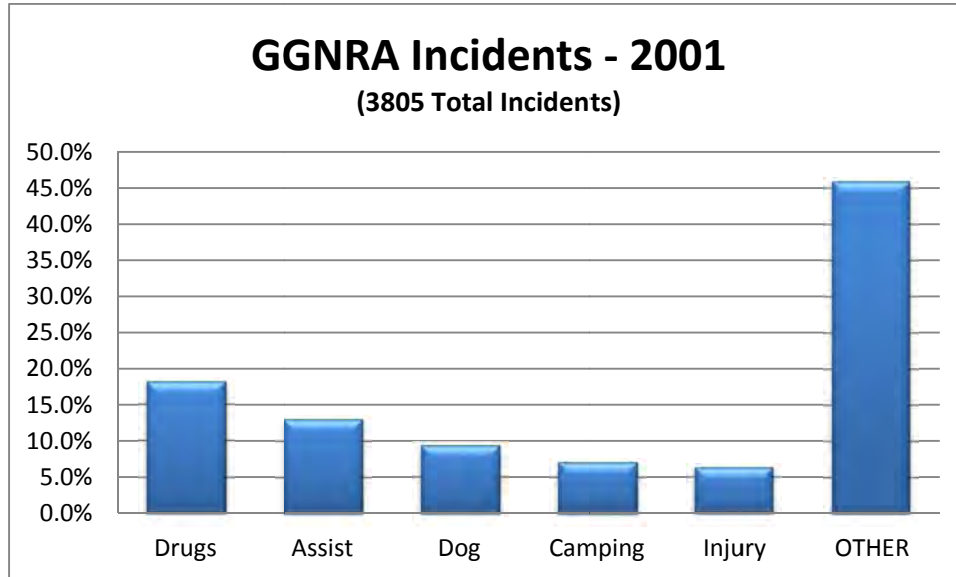
For the "ALL Areas Together" tab, data were sorted by "Violation/CFR Cite" then by "Action Taken." The total number of each type of "Violation/CFR Cite" was determined. The number of each "Action Taken" for each of the above "Violation/CFR Cite" was determined. Graphs were created showing CFR Violations for Dog Incidents in GGNRA. Graphs were created showing CFR Violations broken down by citation, warning, or other in GGNRA.

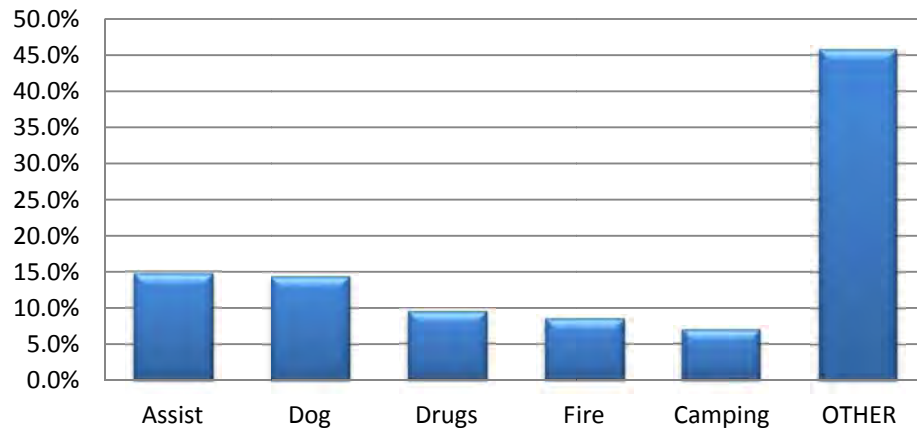
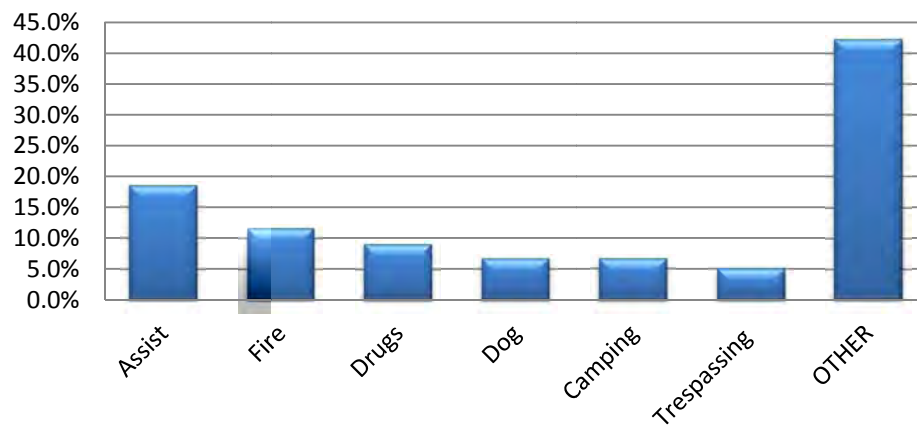
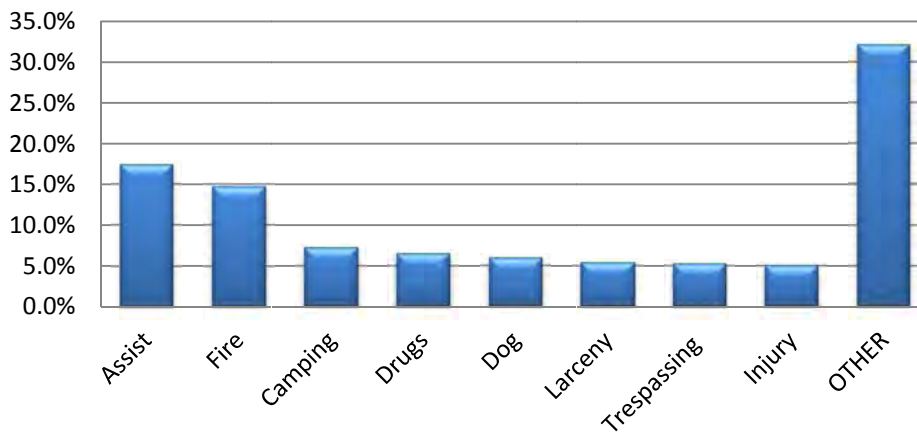
For the "Sorted by Area" tab, data were sorted by "Area," then by "Violation/CFR Cite" and then by "Action Taken." The number of each type of "Violation/CFR Cite" in each Area separately was determined. The number of each "Action Taken" for each of the above "Violation/CFR Cite" in each Area was determined separately. Graphs were created for each Area showing CFR violations and total overall violations. Graphs were created for each Area showing CFR violations broken down by citation, warning, or other.

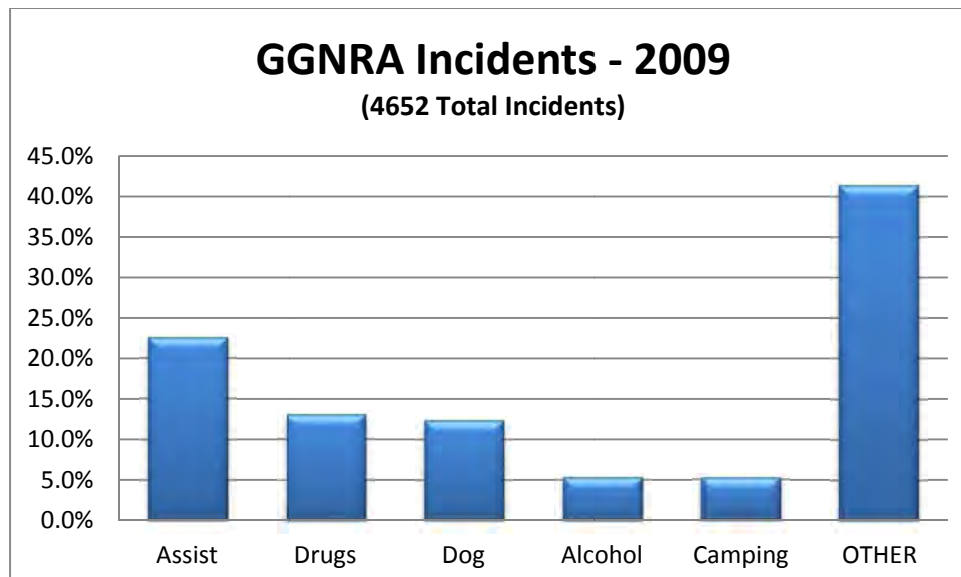
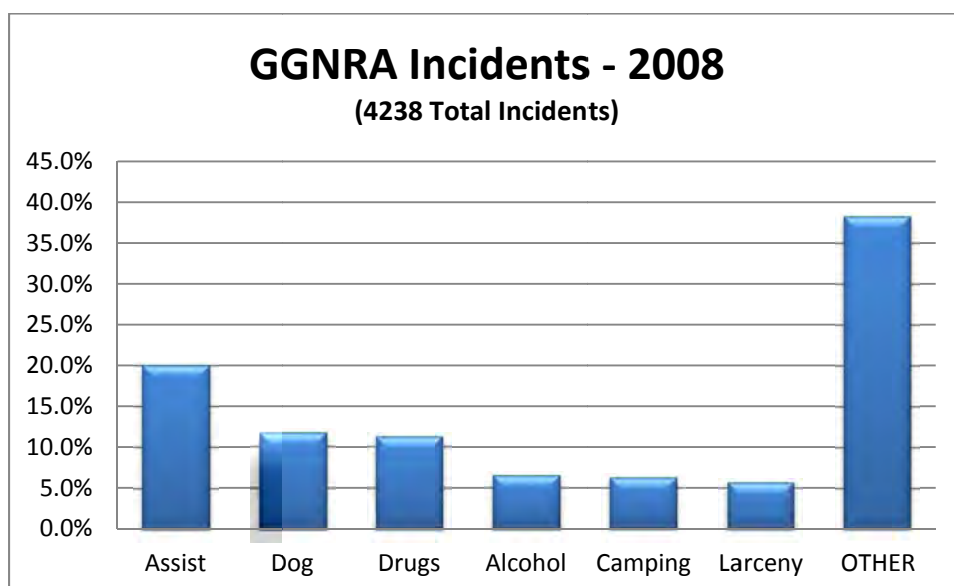
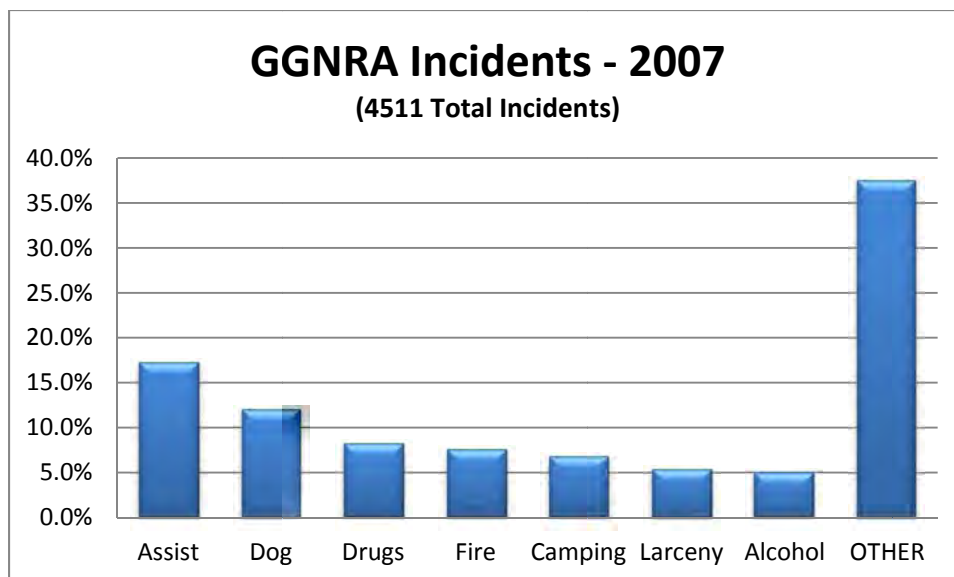
Note that for 2008 data, where violations classified as Crissy Field WPA or Ocean Beach SPPA occurred prior to the September 19, 2008 special regulation promulgation, violations were classified or reclassified as 36 CFR 1.5 (f). Differences may be seen between 2008 and other years of analysis for the Crissy Field WPA and Ocean Beach SPPA violations since these rules were not promulgated until September 19, 2008.

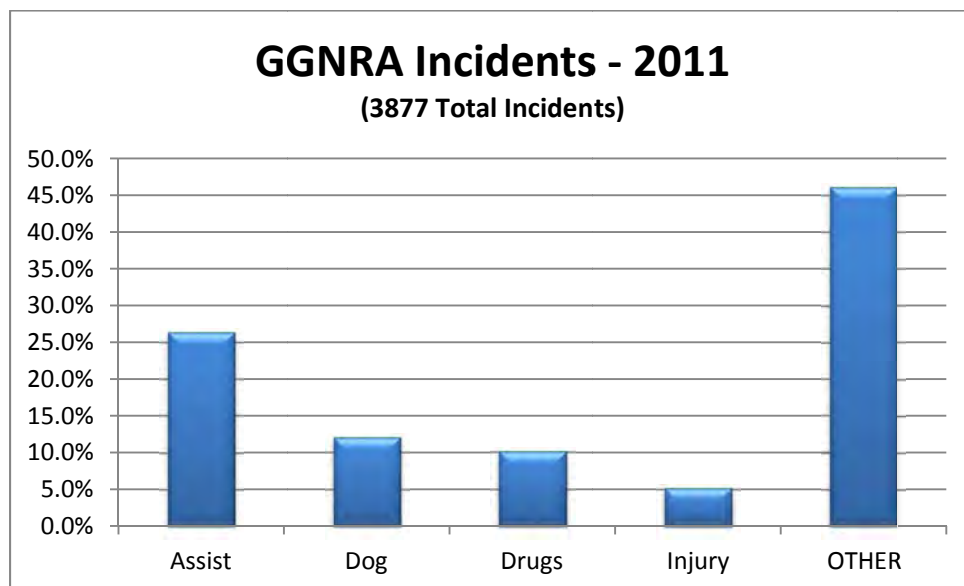
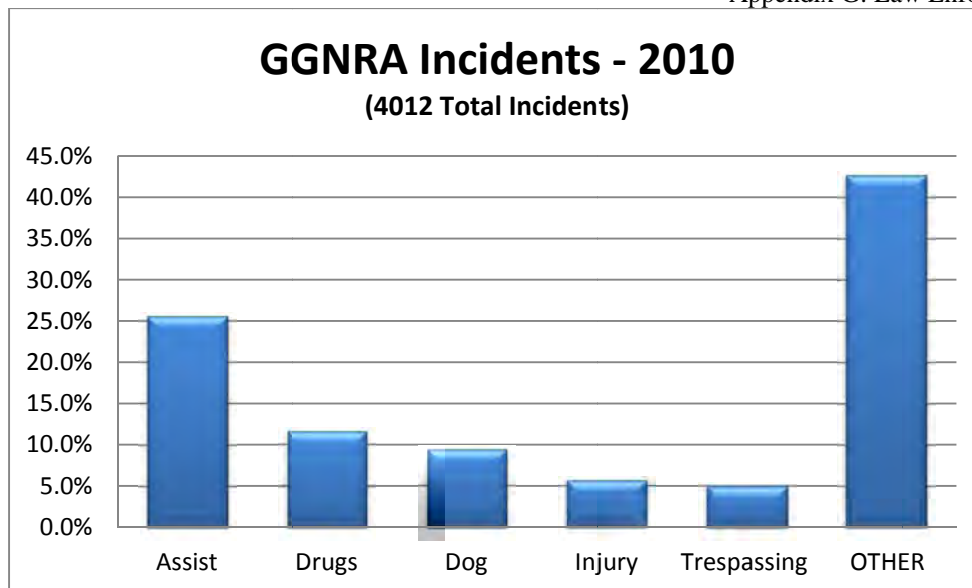
Attachment A: Graphs of LE Data Analysis for All Incidents

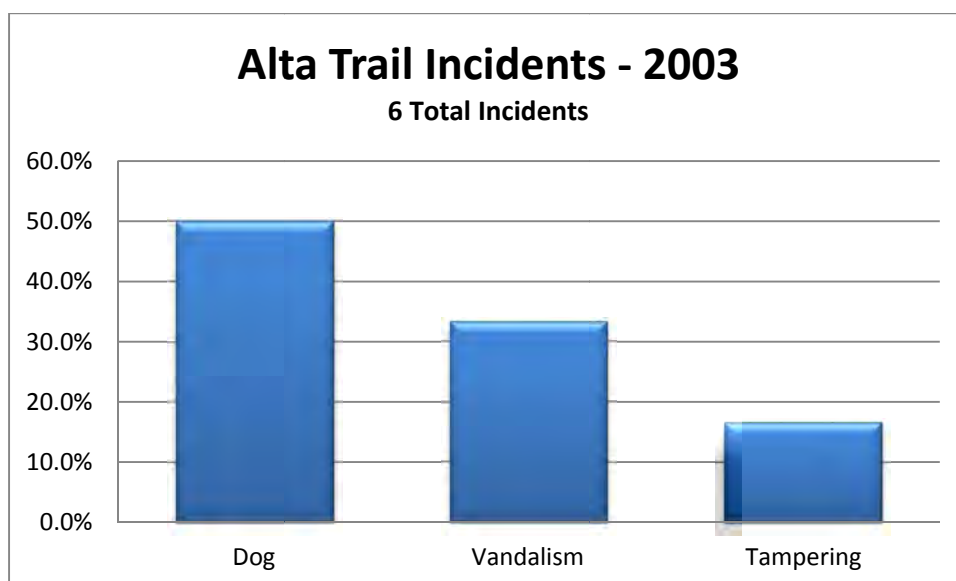
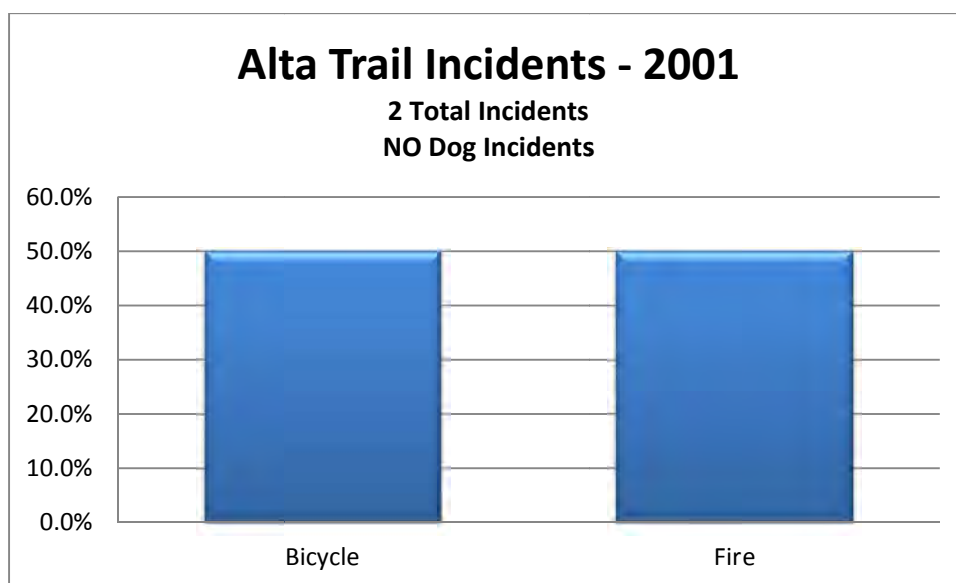
A1: All of GGNRA

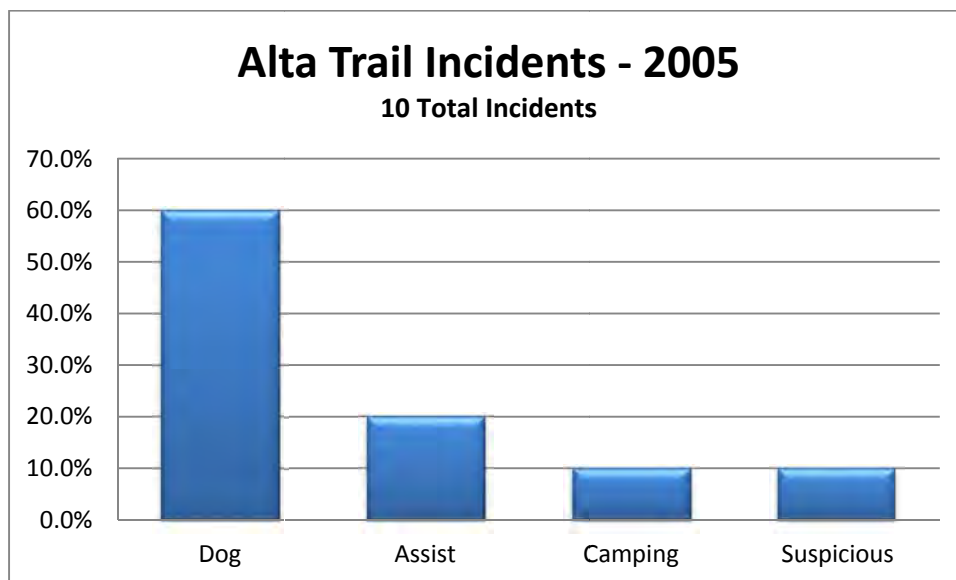
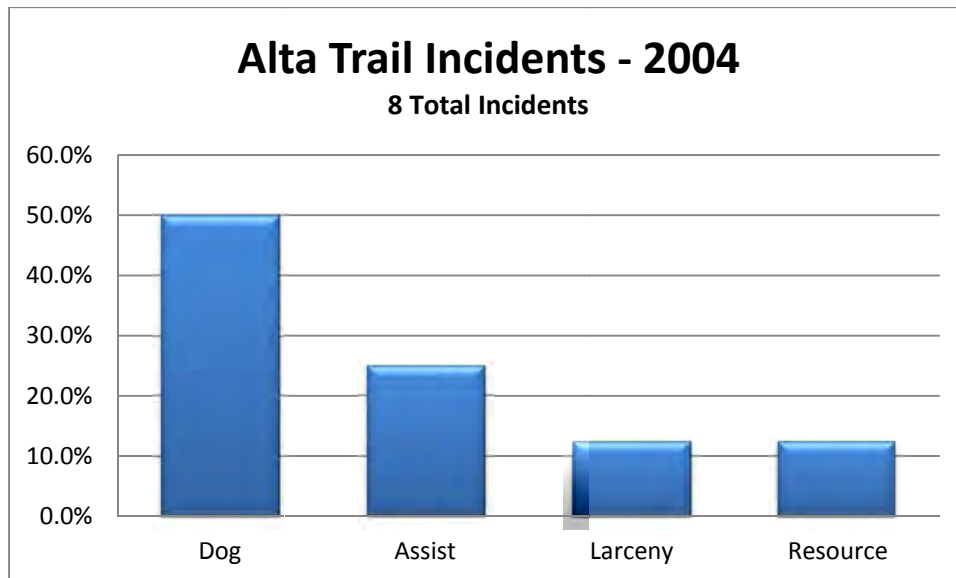


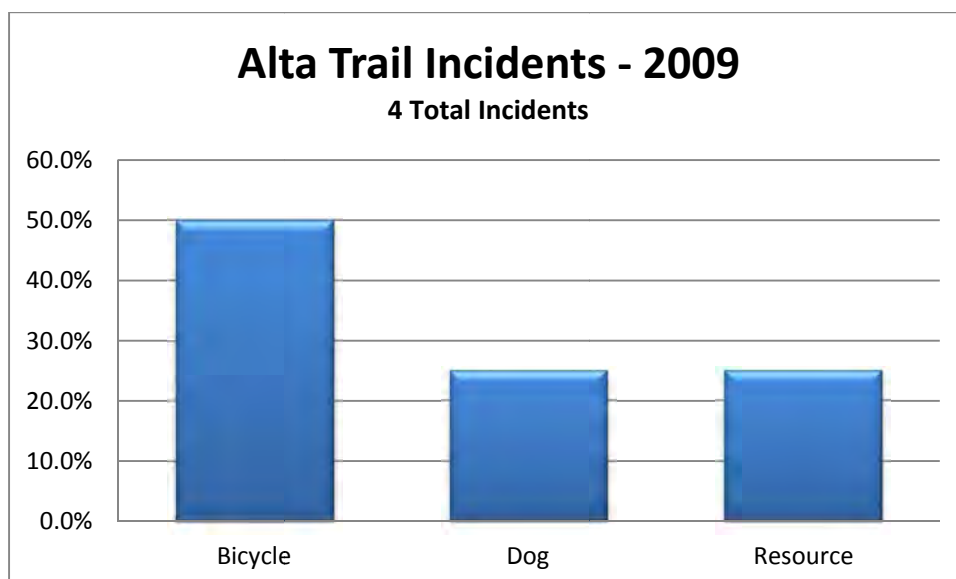
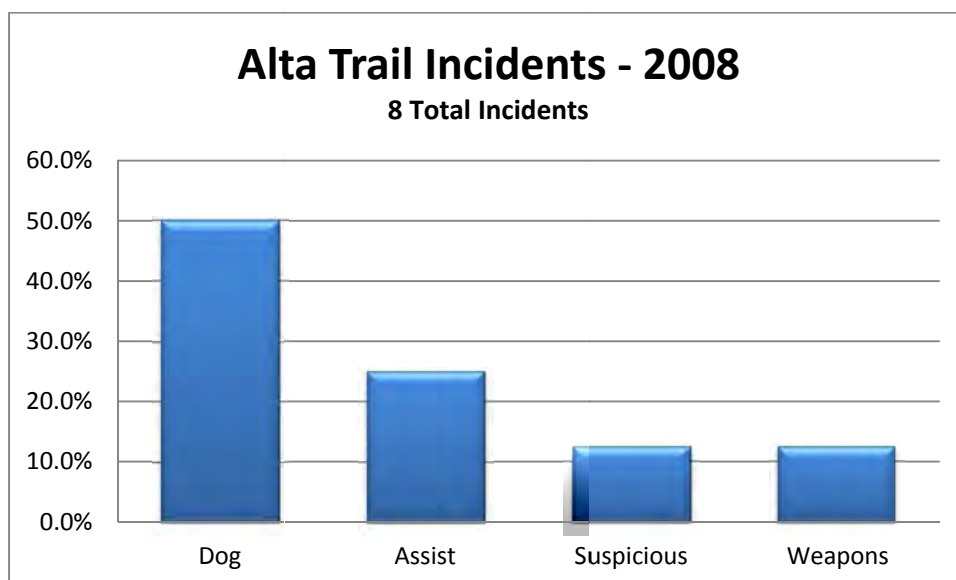
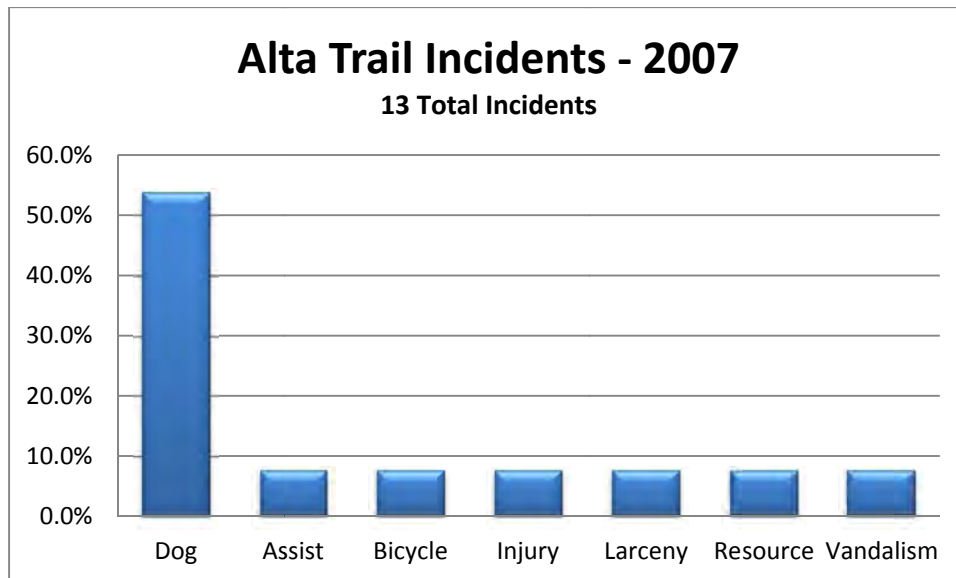
GGNRA Incidents - 2004**(4769 Total Incidents)****GGNRA Incidents - 2005****(4366 Total Incidents)****GGNRA Incidents - 2006****(3943 Total Incidents)**

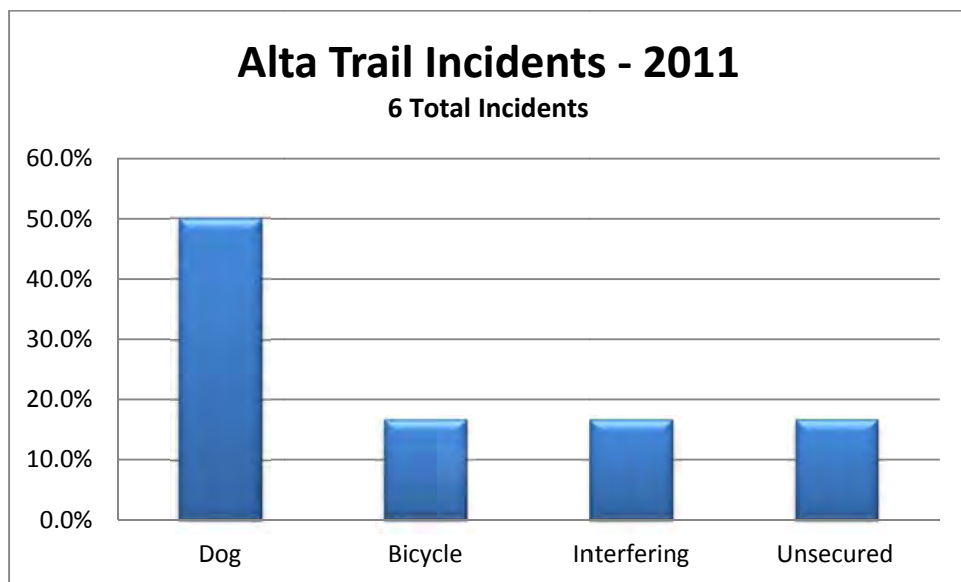






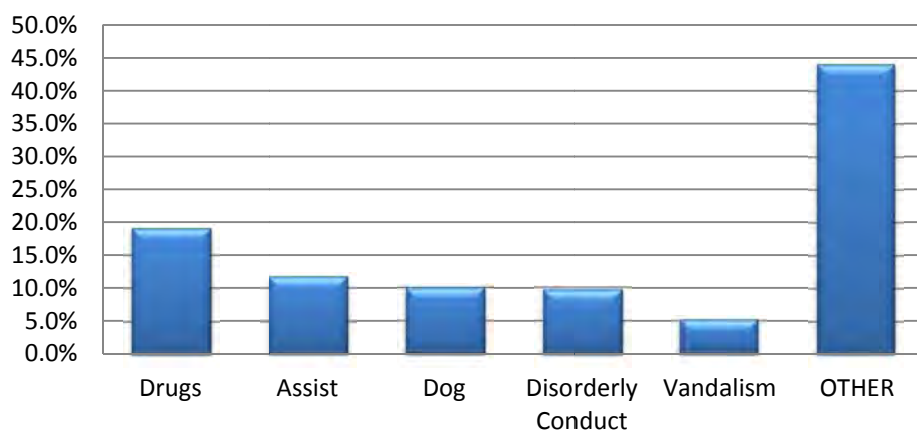






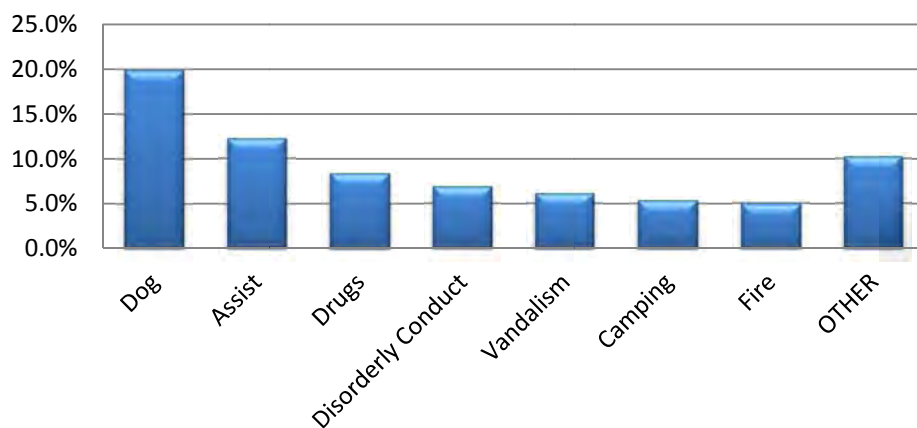
Baker Beach Incidents - 2001

288 Total Incidents



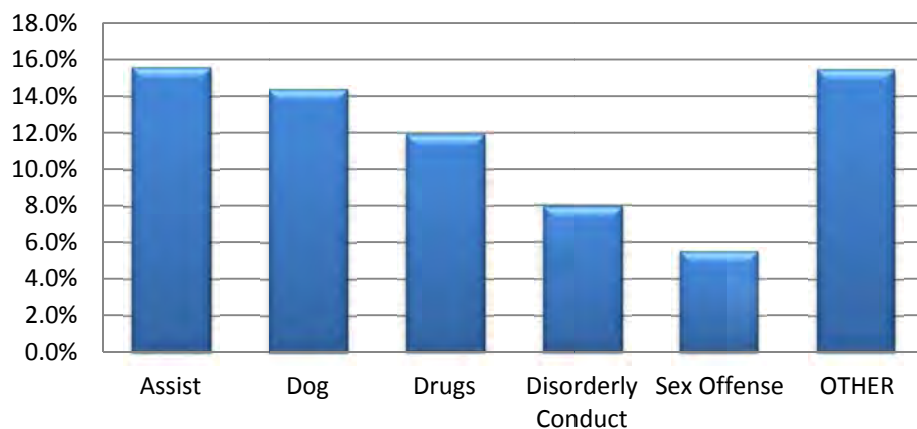
Baker Beach Incidents - 2002

261 Total Incidents



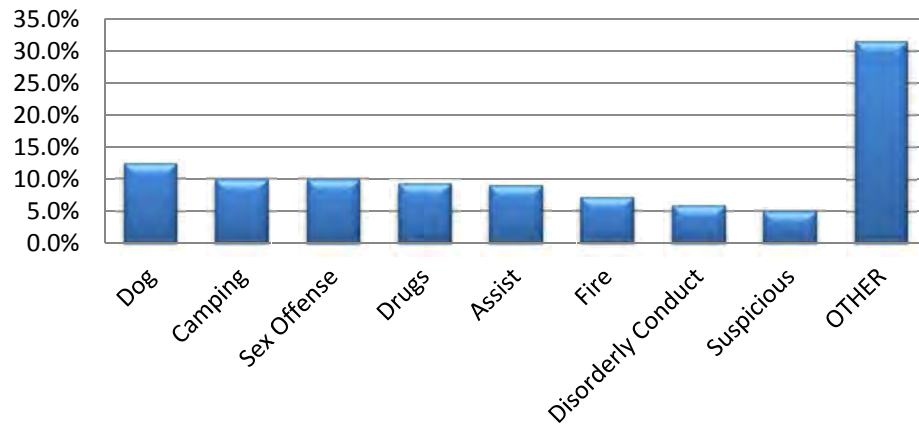
Baker Beach Incidents - 2003

327 Total Incidents



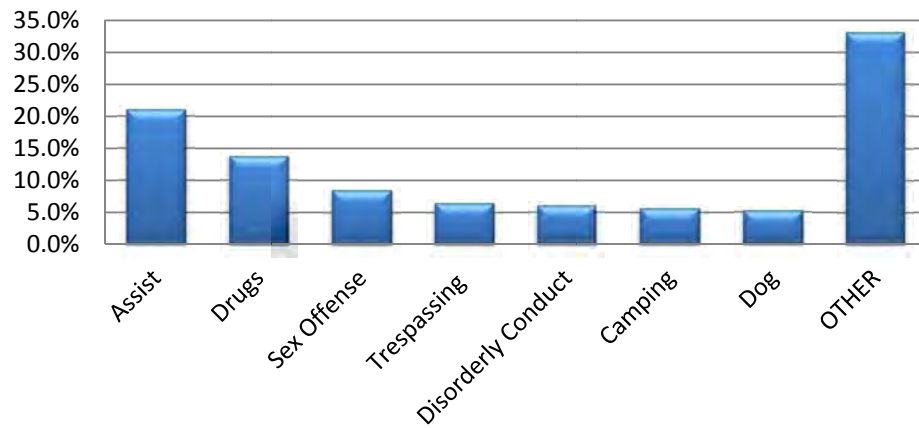
Baker Beach Incidents - 2004

323 Total Incidents



Baker Beach Incidents - 2005

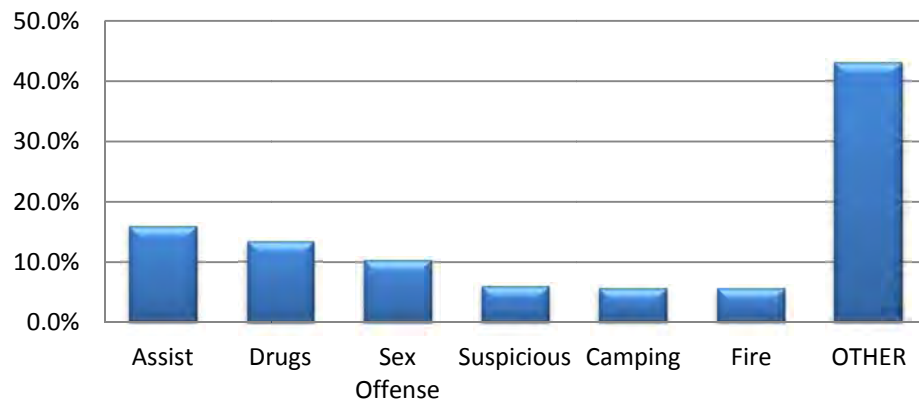
247 Total Incidents



Baker Beach Incidents - 2006

232 Total Incidents

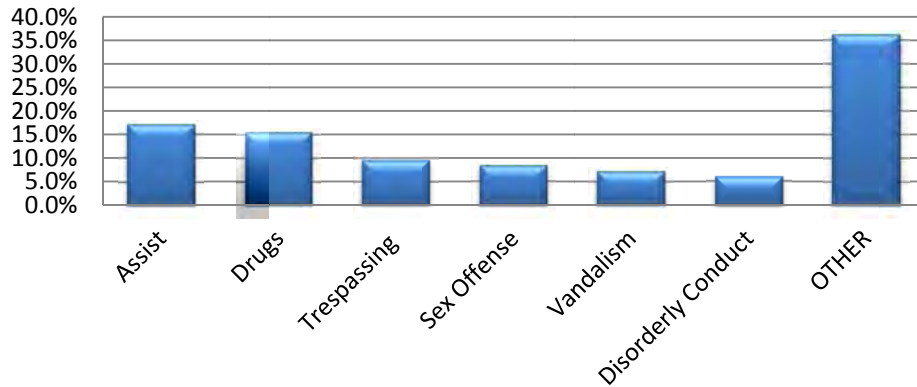
Dog Incidents Included in "Other" = 4.7%



Baker Beach Incidents - 2007

251 Total Incidents

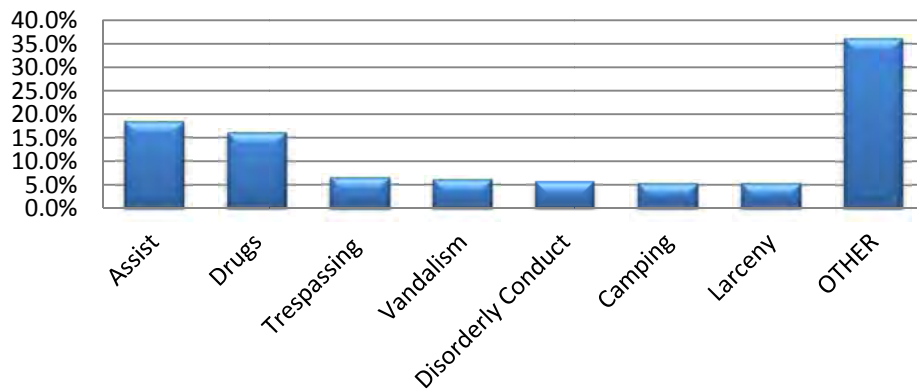
Dog Incidents Included in "Other" = 1.2%



Baker Beach Incidents - 2008

260 Total Incidents

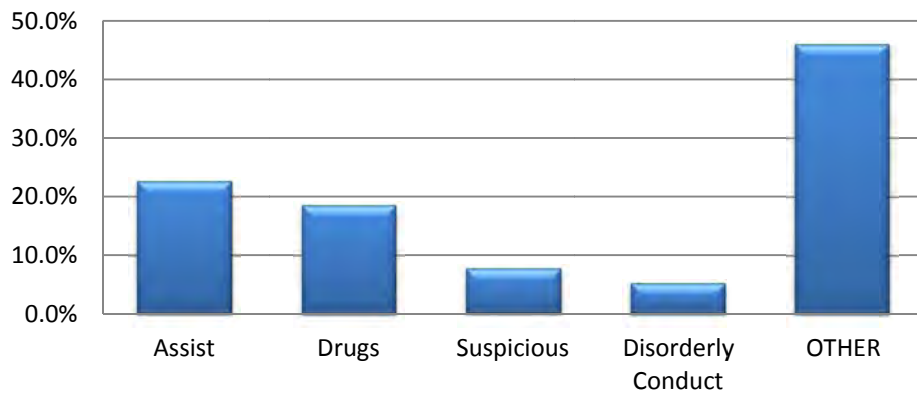
Dog Incidents Included in "Other" = 3.1%



Baker Beach Incidents - 2009

287 Total Incidents

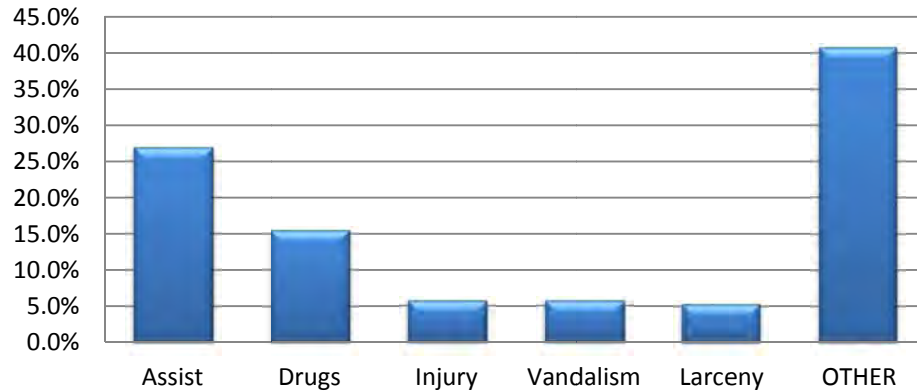
Dog Incidents Included in "Other" = 2.8%



Baker Beach Incidents - 2010

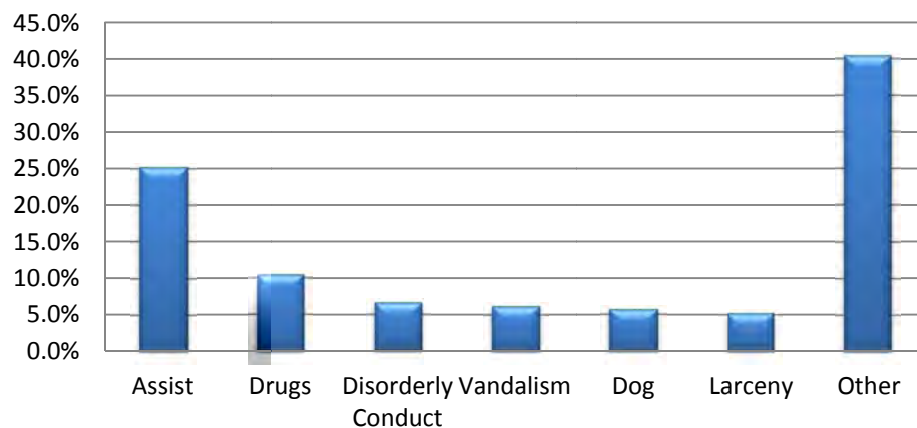
245 Total Incidents

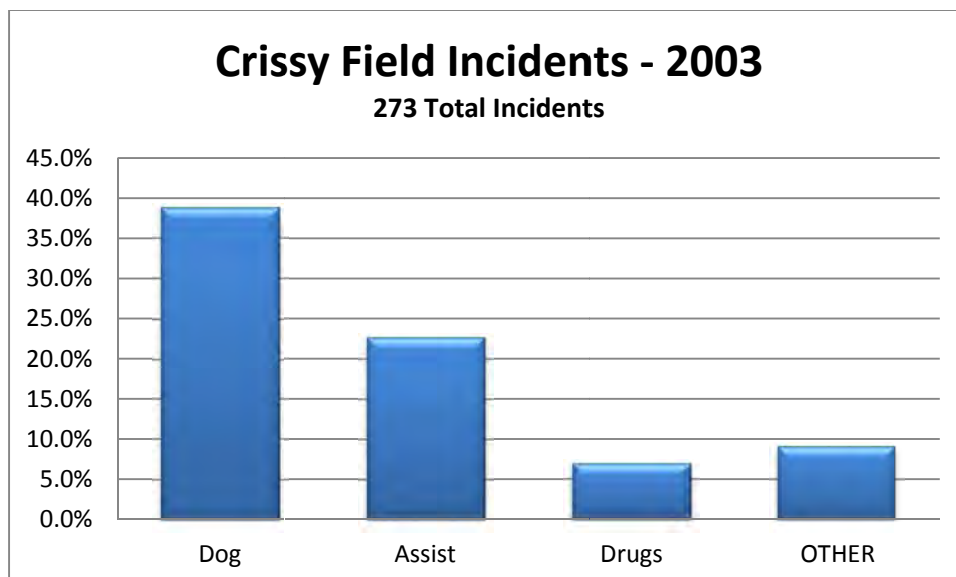
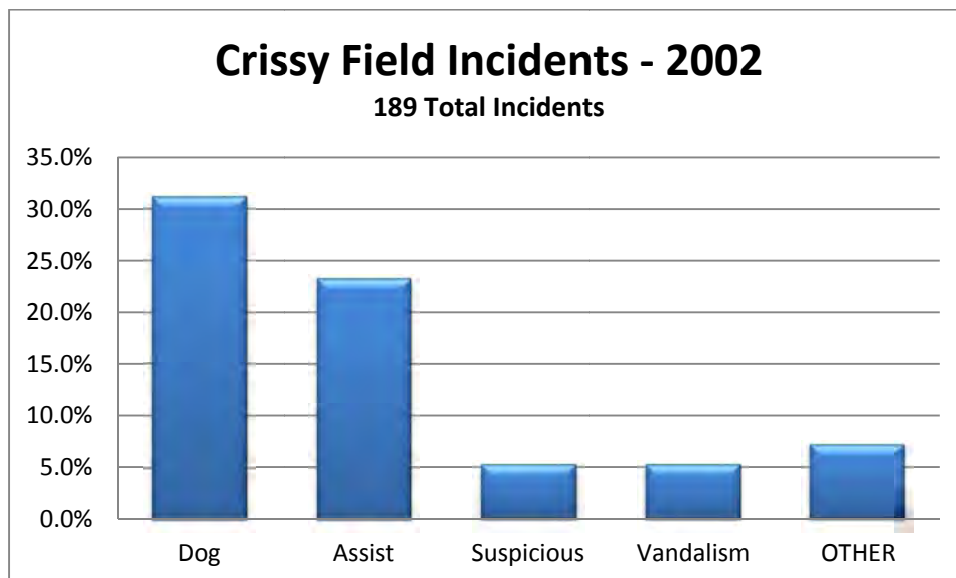
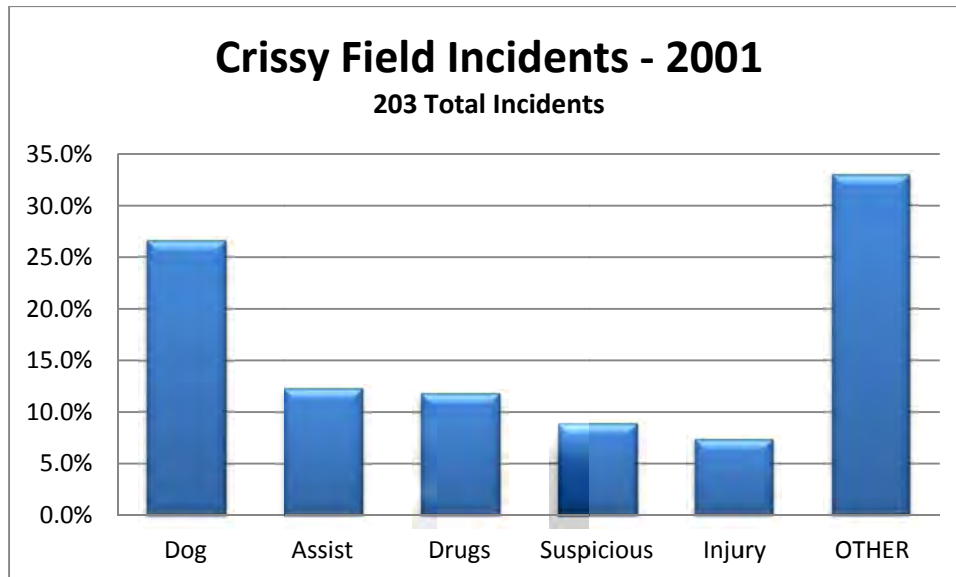
Dog Incidents Included in "Other" = 4.1%



Baker Beach Incidents - 2011

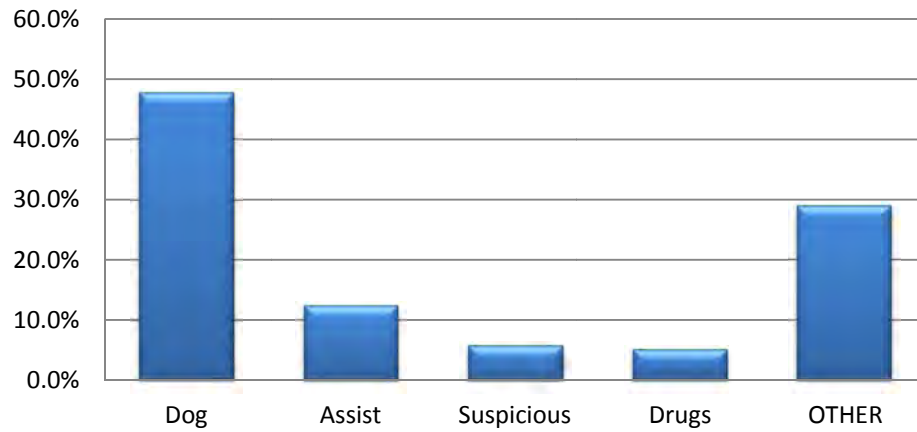
210 Total Incidents





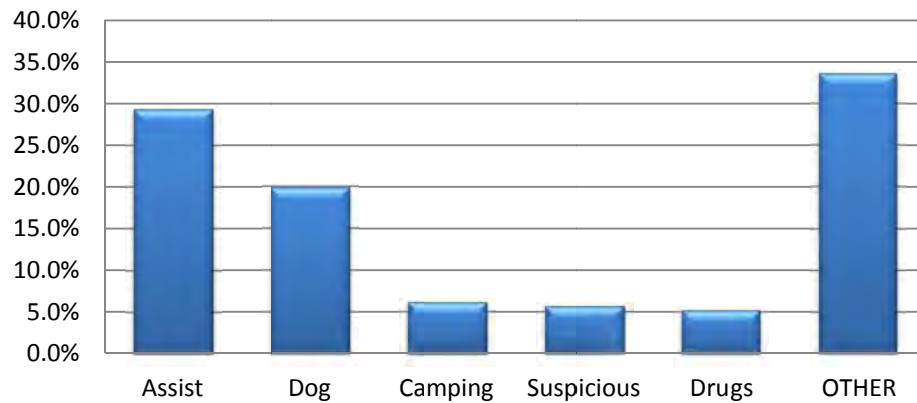
Crissy Field Incidents - 2004

314 Total Incidents



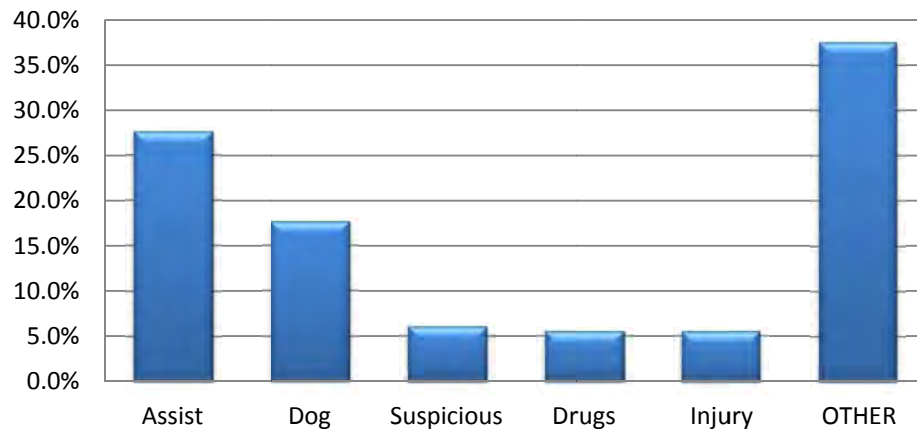
Crissy Field Incidents - 2005

211 Total Incidents



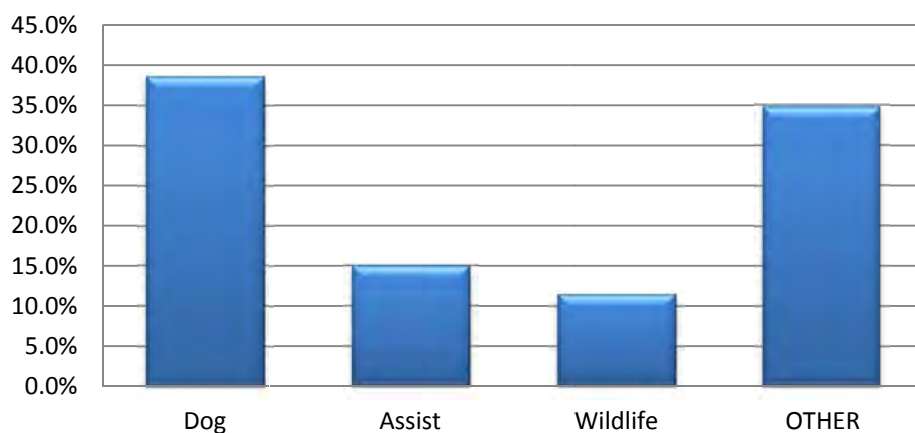
Crissy Field Incidents - 2006

181 Total Incidents



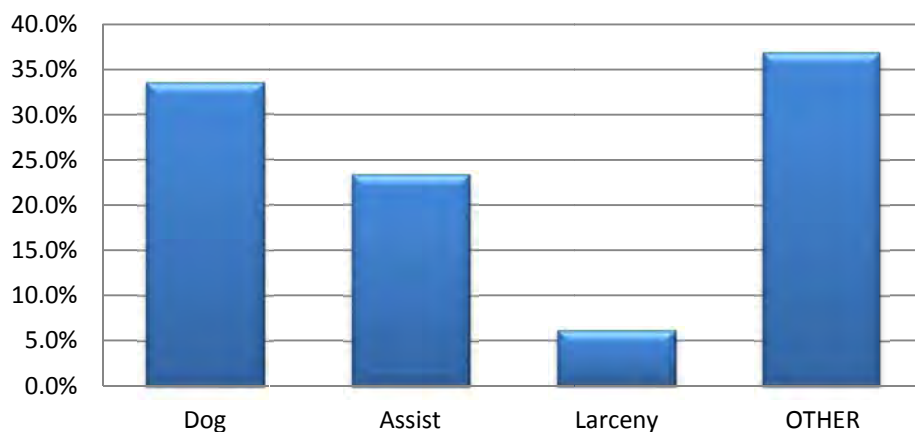
Crissy Field Incidents - 2007

313 Total Incidents



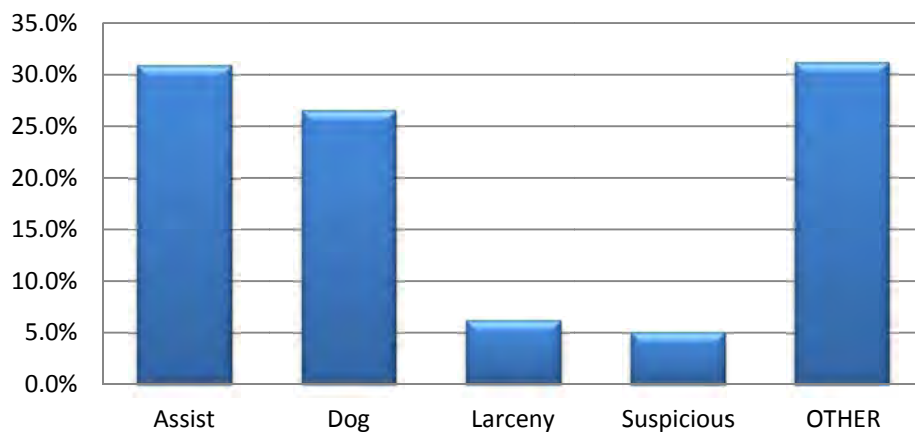
Crissy Field Incidents - 2008

325 Total Incidents



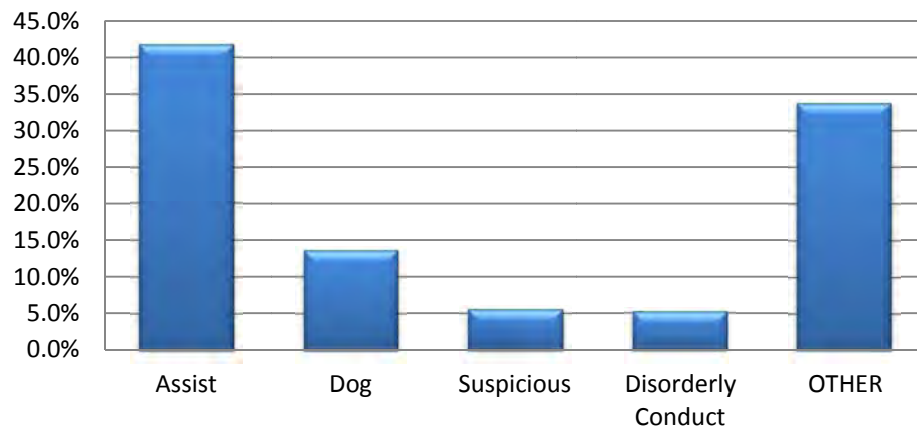
Crissy Field Incidents - 2009

433 Total Incidents



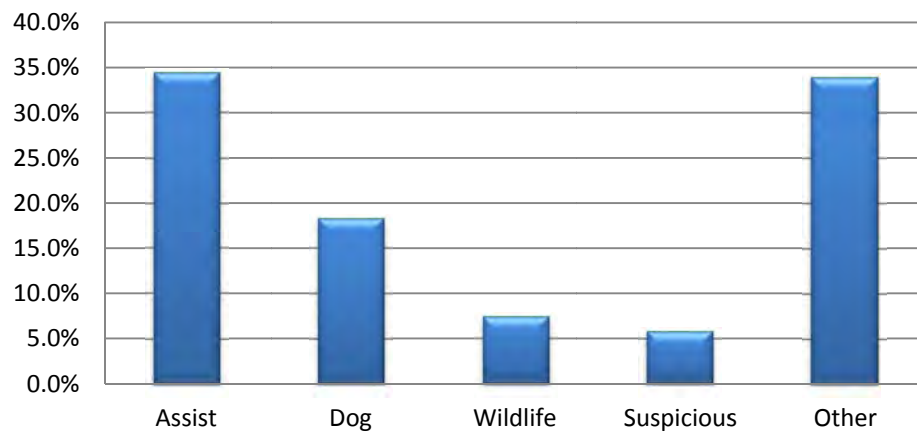
Crissy Field Incidents - 2010

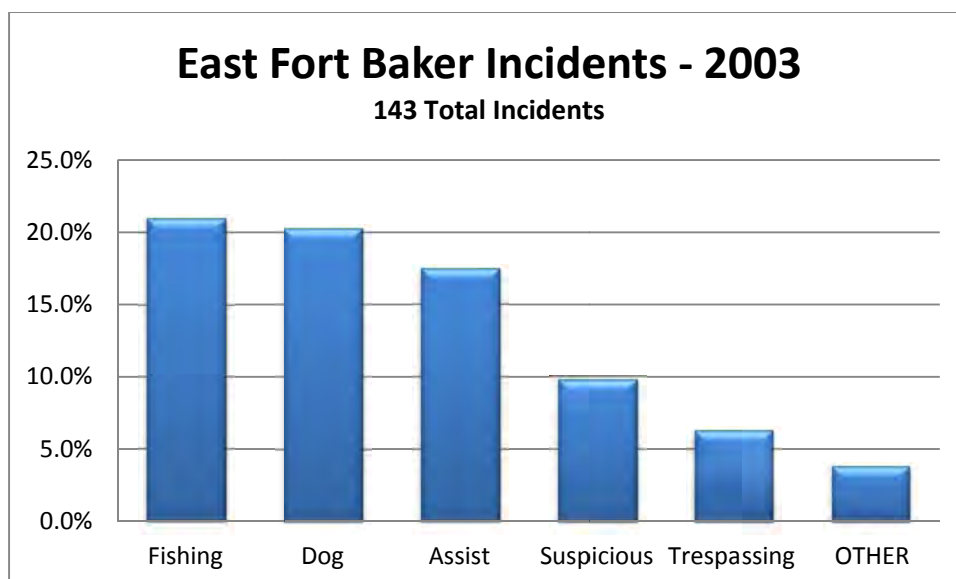
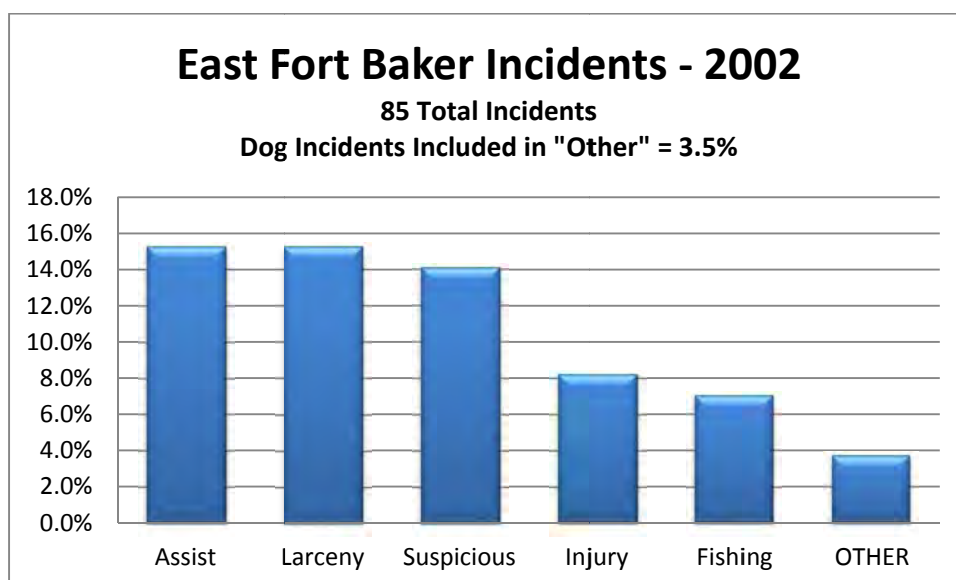
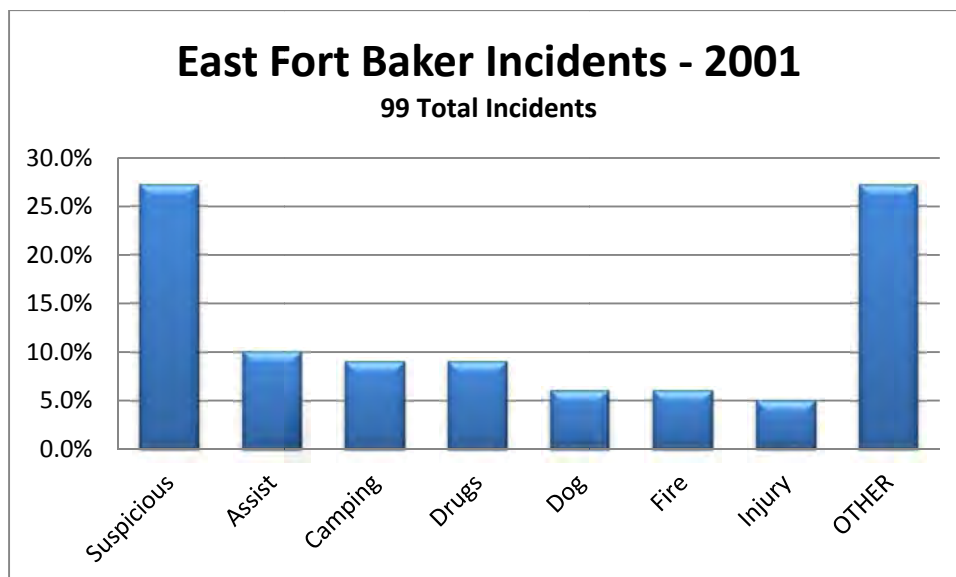
287 Total Incidents

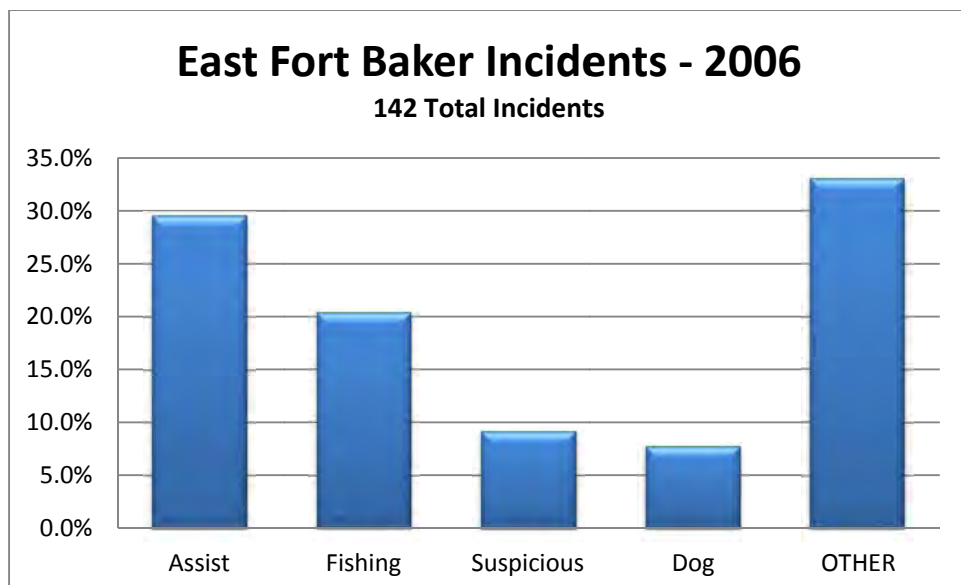
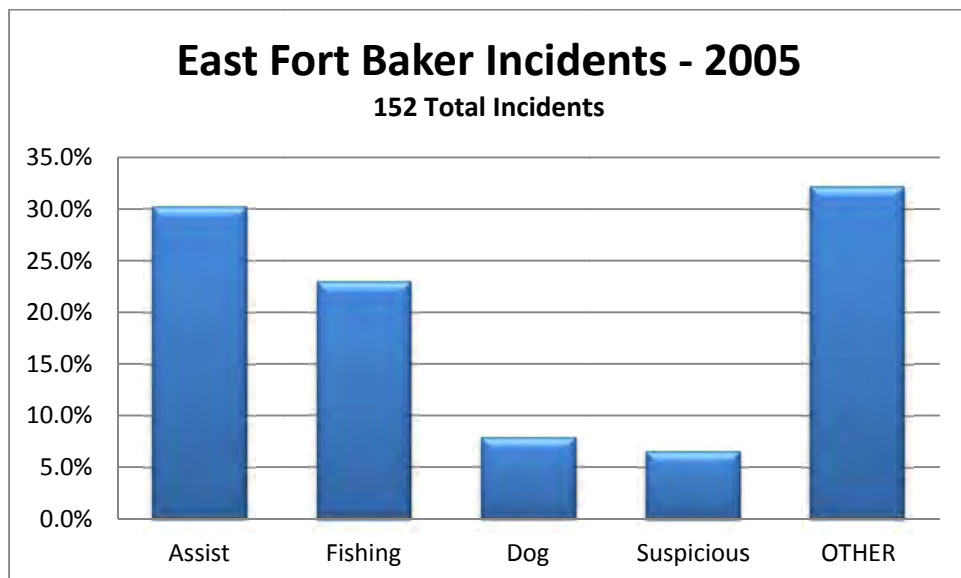
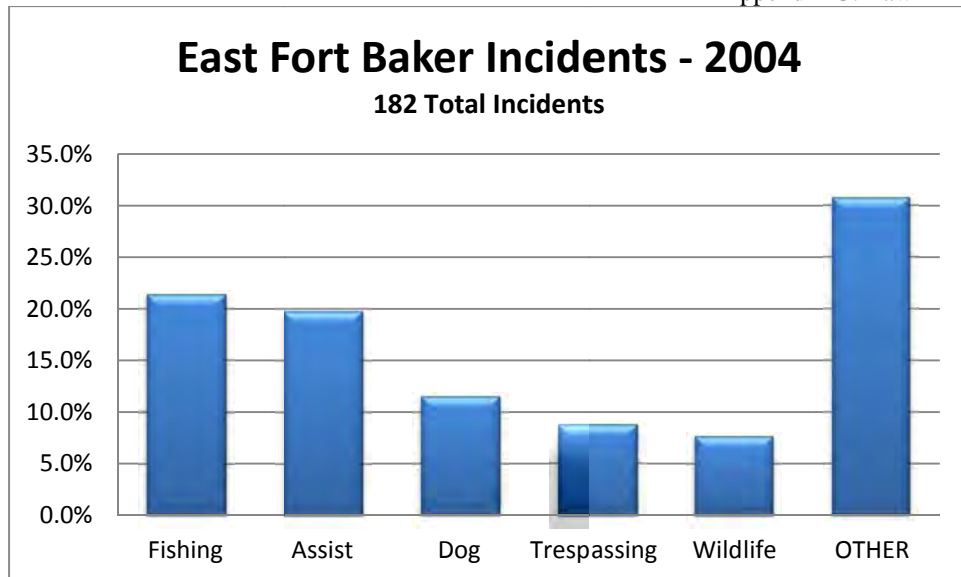


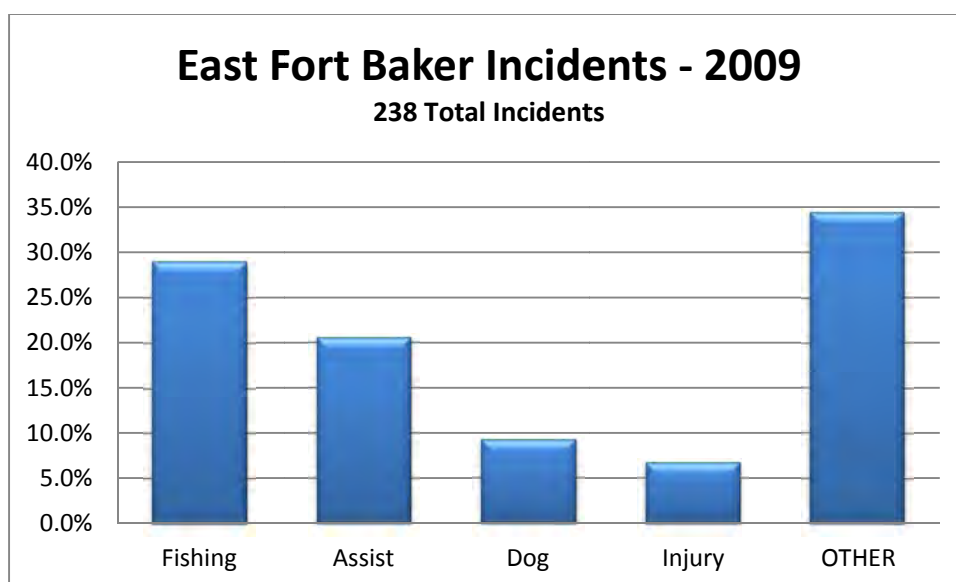
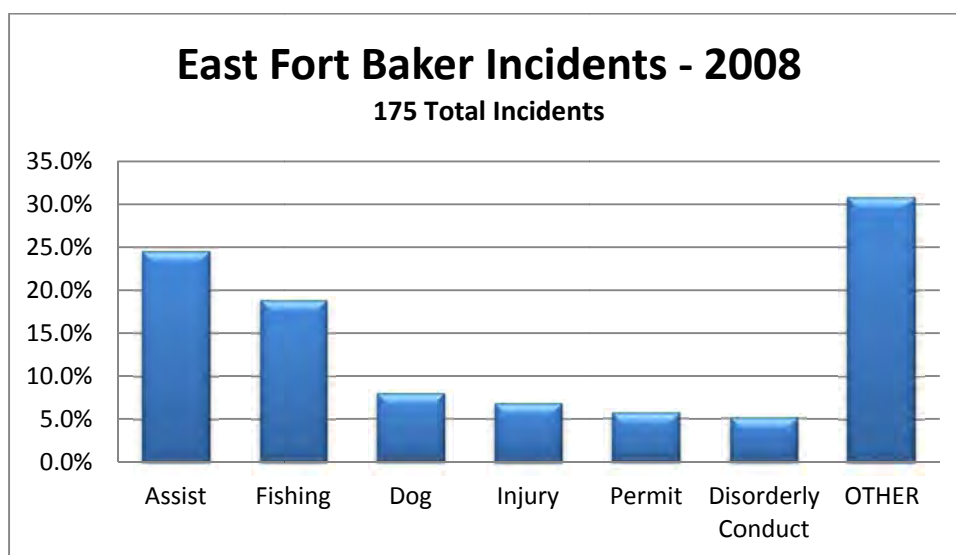
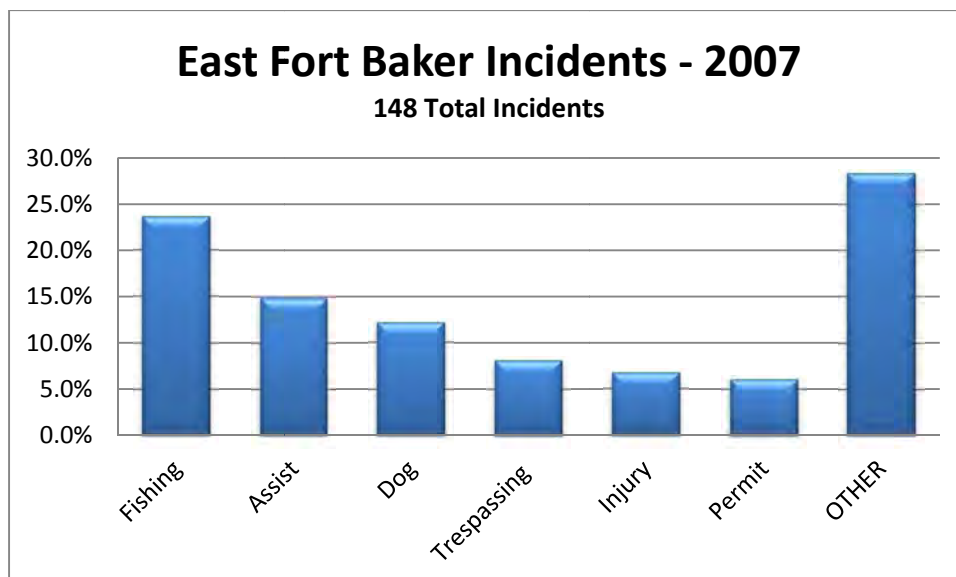
Crissy Field Incidents - 2011

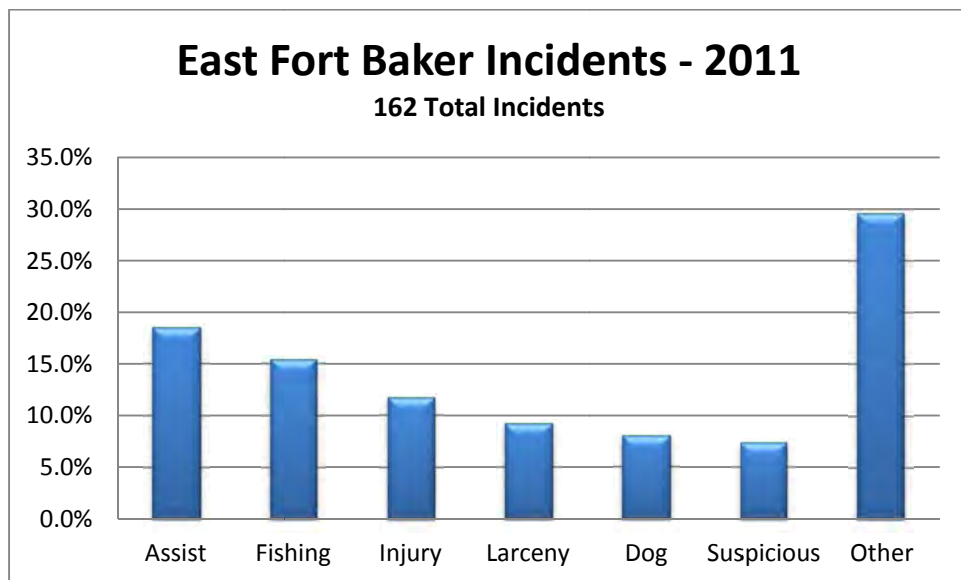
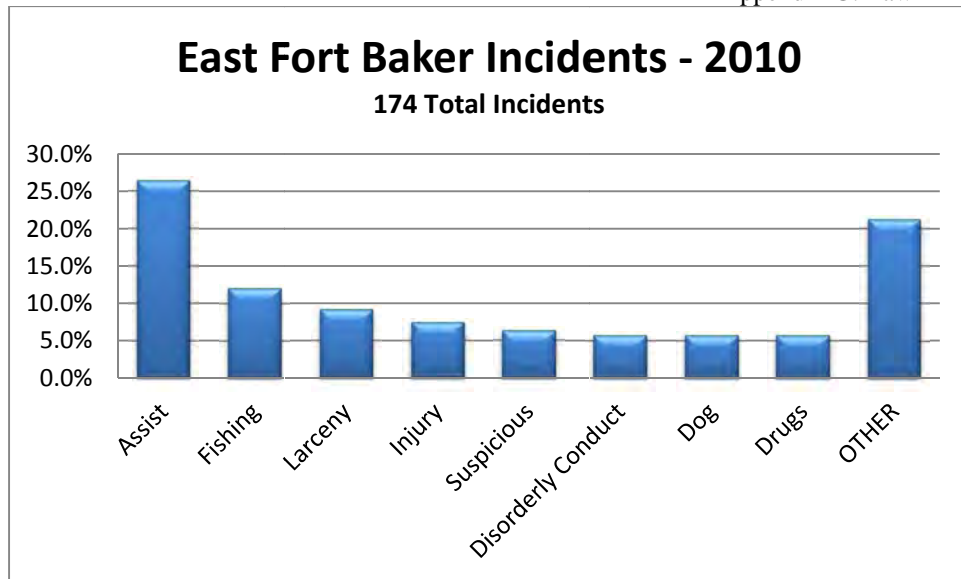
377 Total Incidents

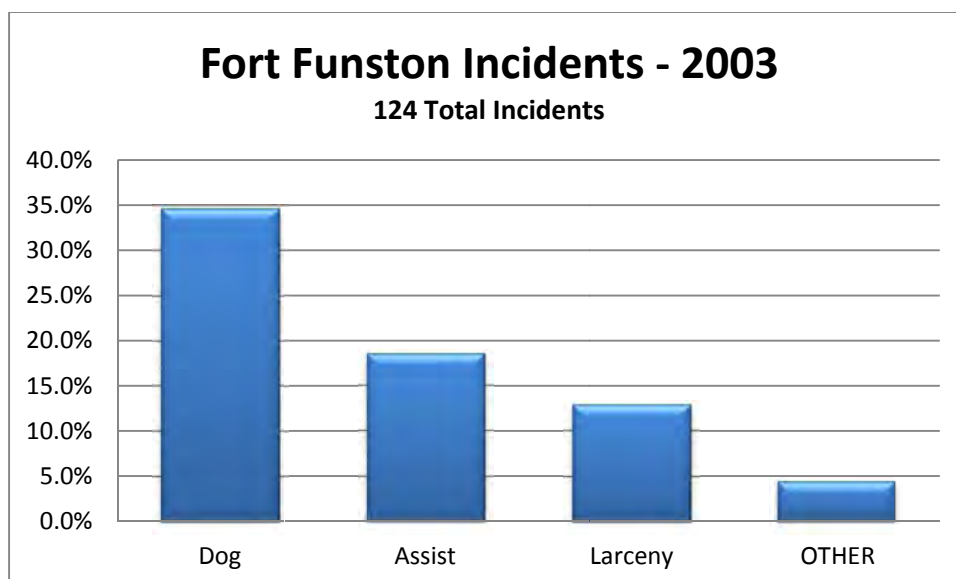
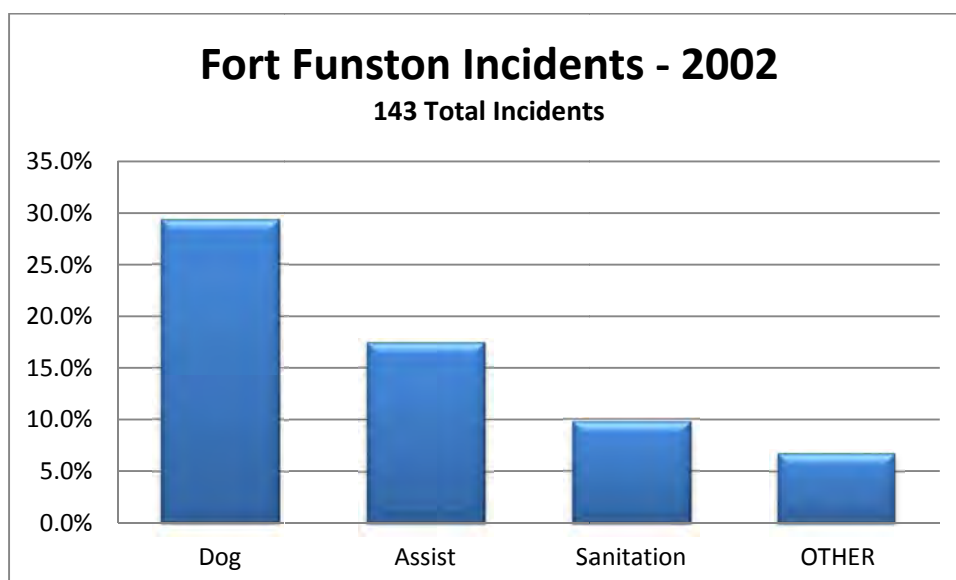
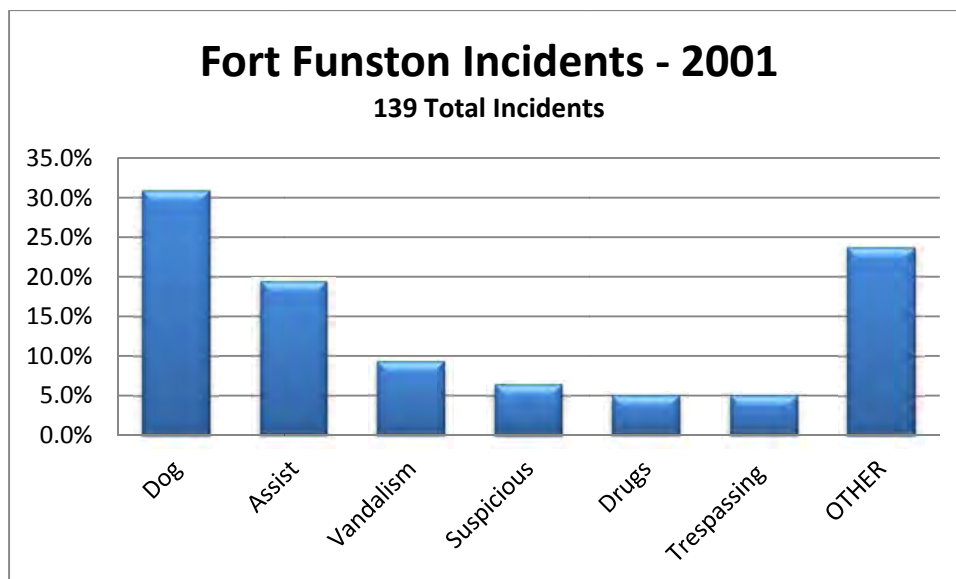






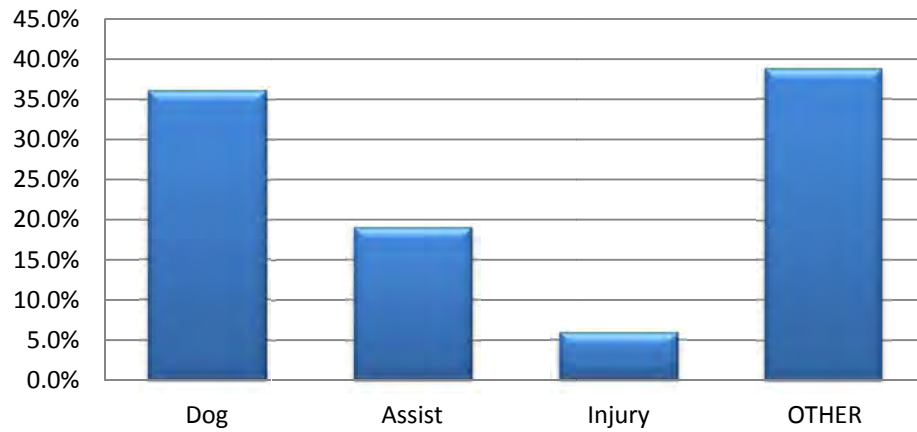






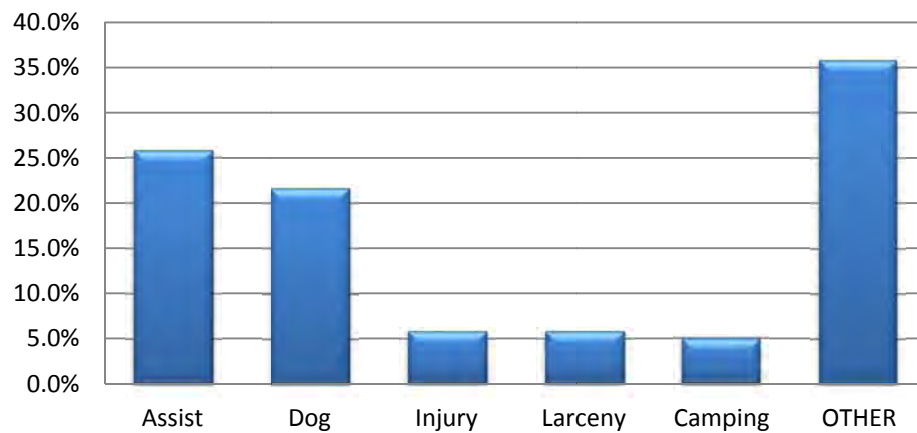
Fort Funston Incidents - 2004

152 Total Incidents



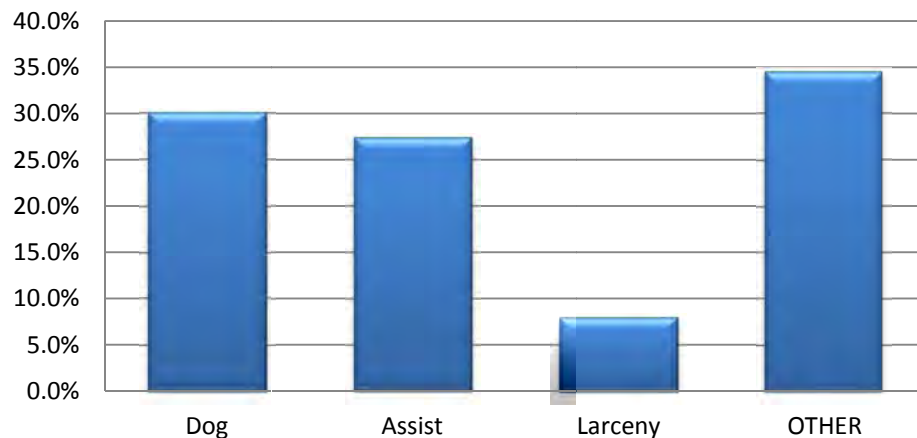
Fort Funston Incidents - 2005

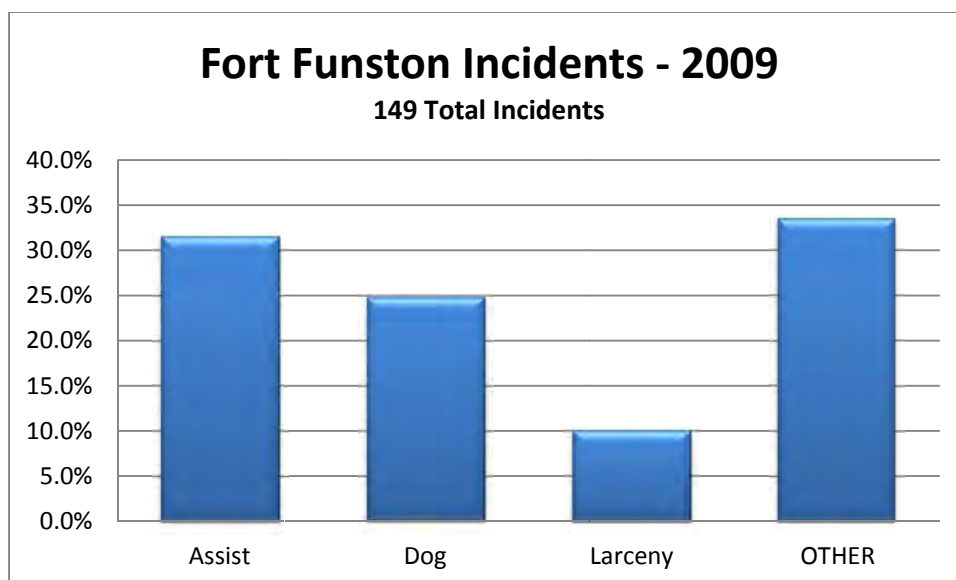
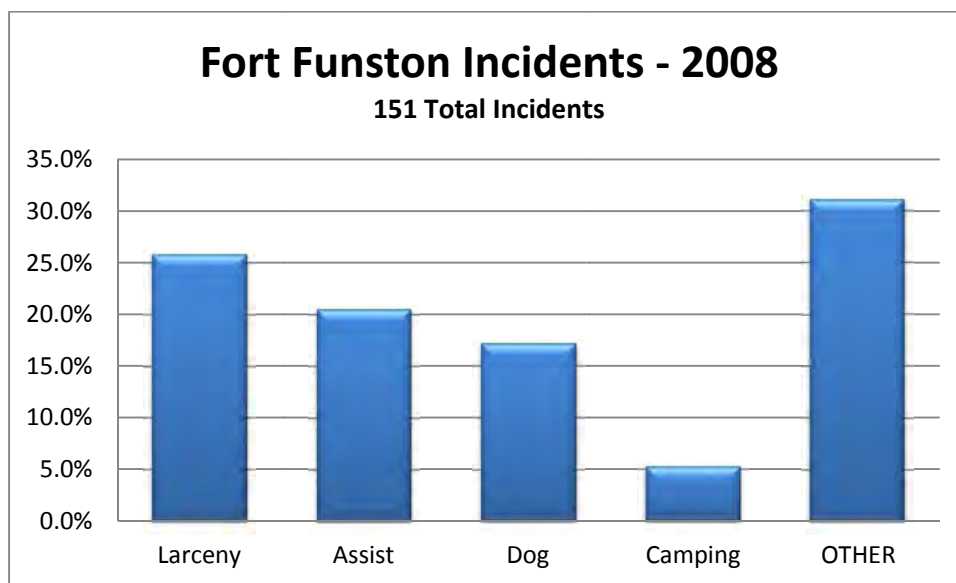
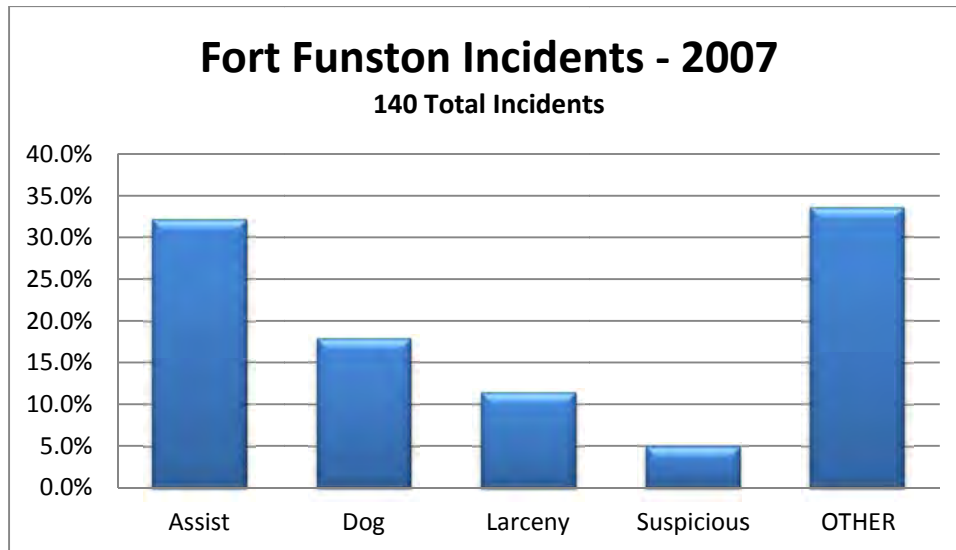
120 Total Incidents

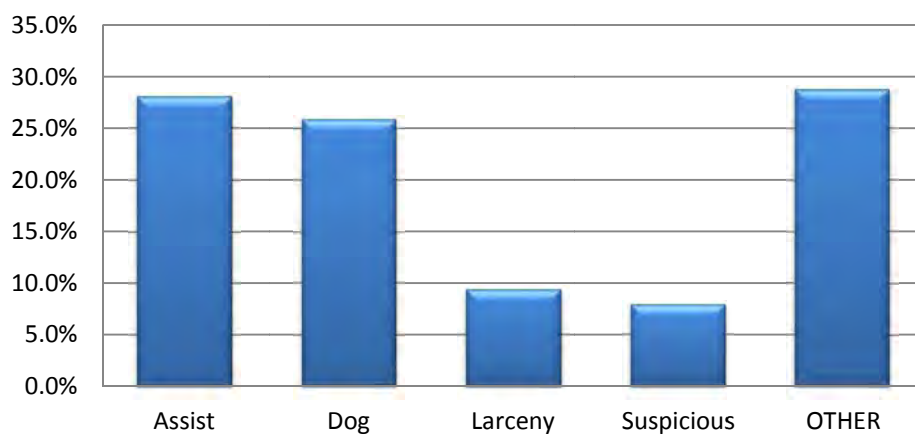
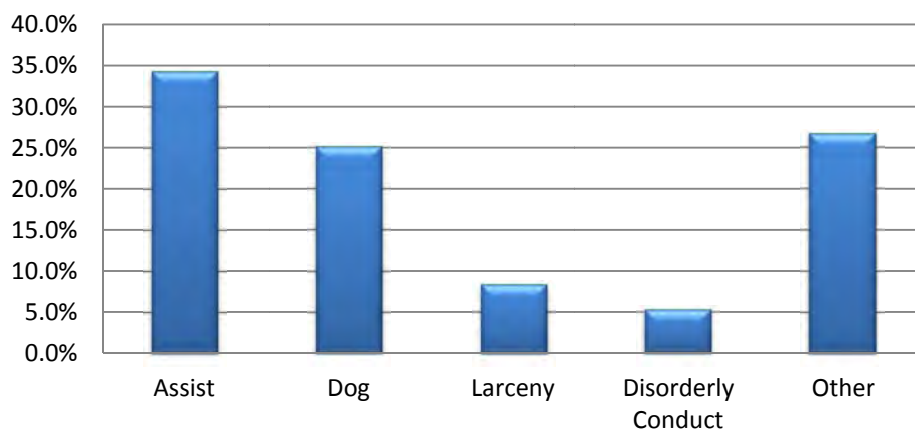


Fort Funston Incidents - 2006

113 Total Incidents



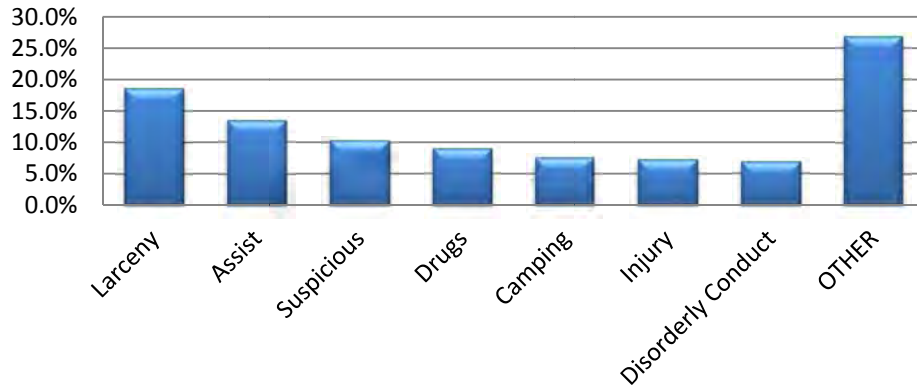


Fort Funston Incidents - 2010**139 Total Incidents****Fort Funston Incidents - 2011****131 Total Incidents**

Fort Mason Incidents - 2001

290 Total Incidents

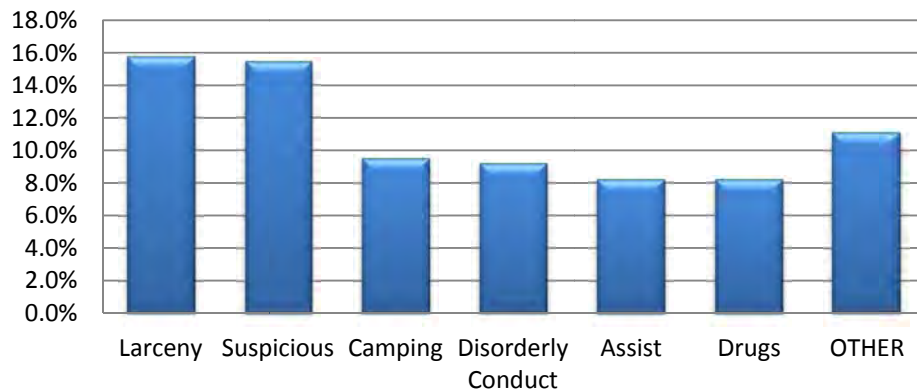
Dog Incidents Included in "Other" = 2.4%



Fort Mason Incidents - 2002

304 Total Incidents

Dog Incidents Included in "Other" = 2.0%



Fort Mason Incidents - 2003

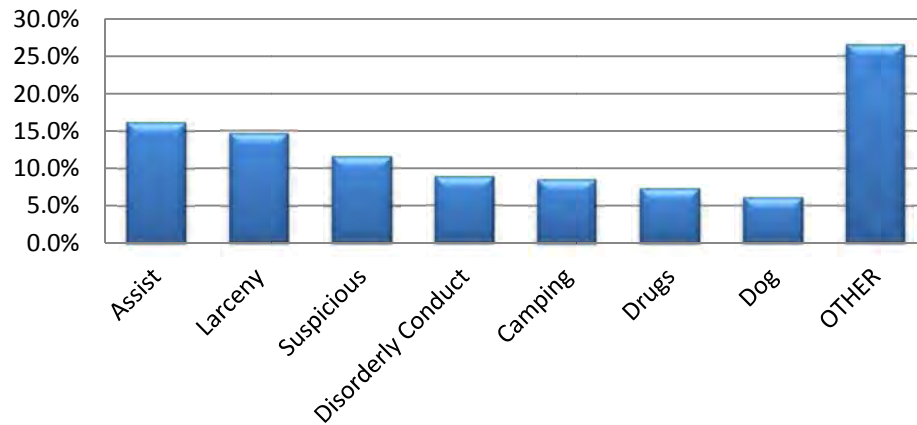
288 Total Incidents

Dog Incidents Included in "Other" = 3.5%



Fort Mason Incidents - 2004

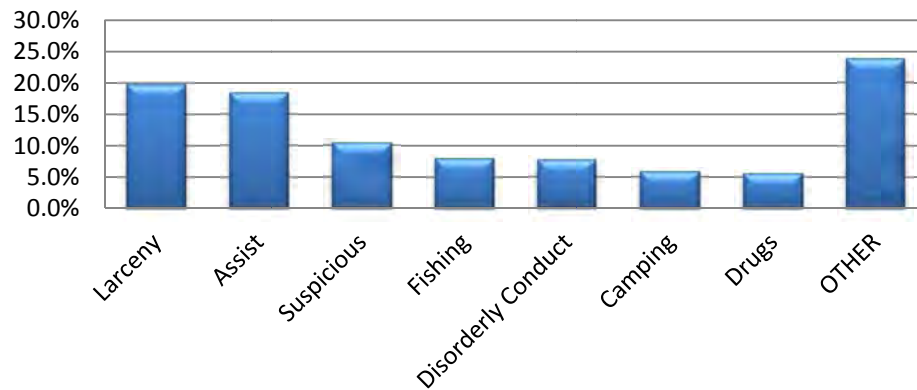
327 Total Incidents



Fort Mason Incidents - 2005

373 Total Incidents

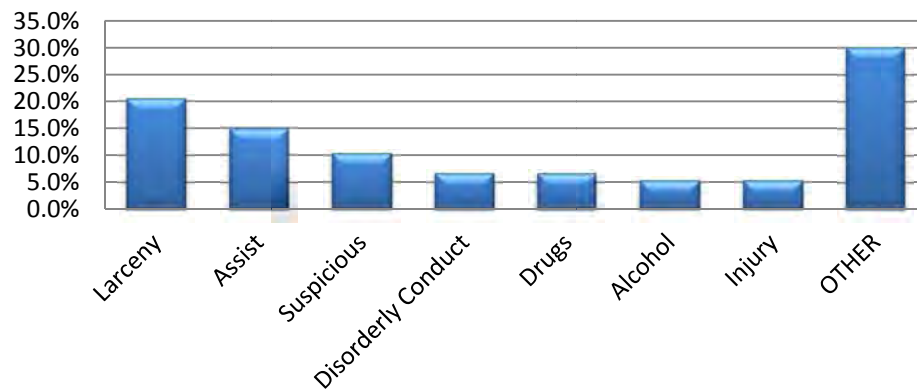
Dog Incidents Included in "Other" = 1.3%



Fort Mason Incidents - 2006

375 Total Incidents

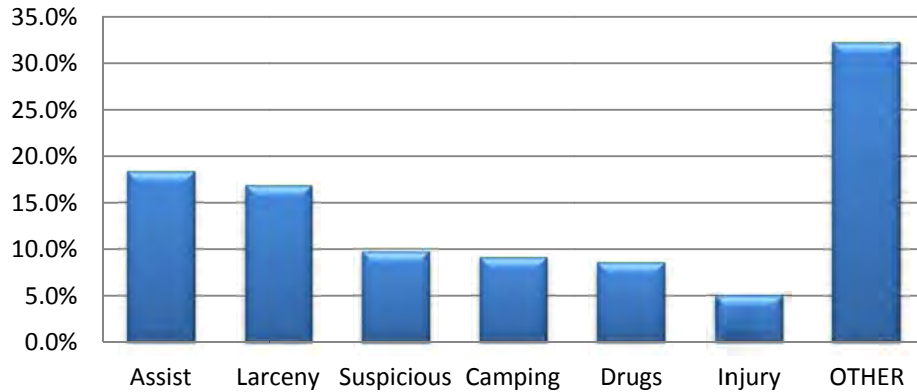
Dog Incidents Included in "Other" = 2.7%



Fort Mason Incidents - 2007

338 Total Incidents

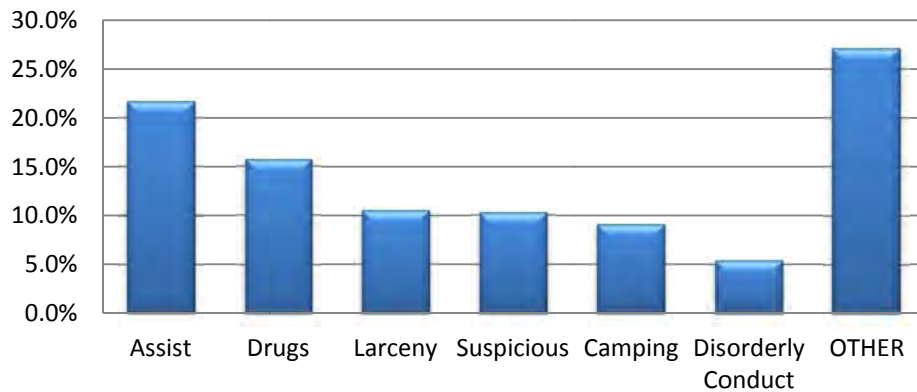
Dog Incidents Included in "Other" = 2.7%



Fort Mason Incidents - 2008

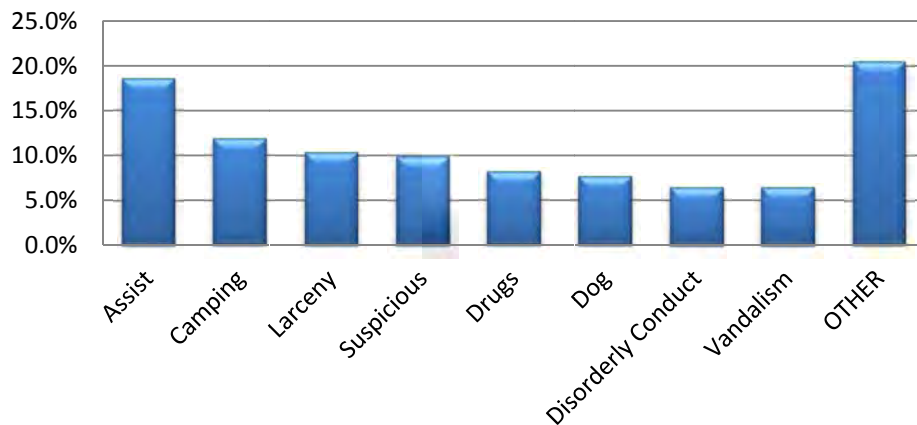
350 Total Incidents

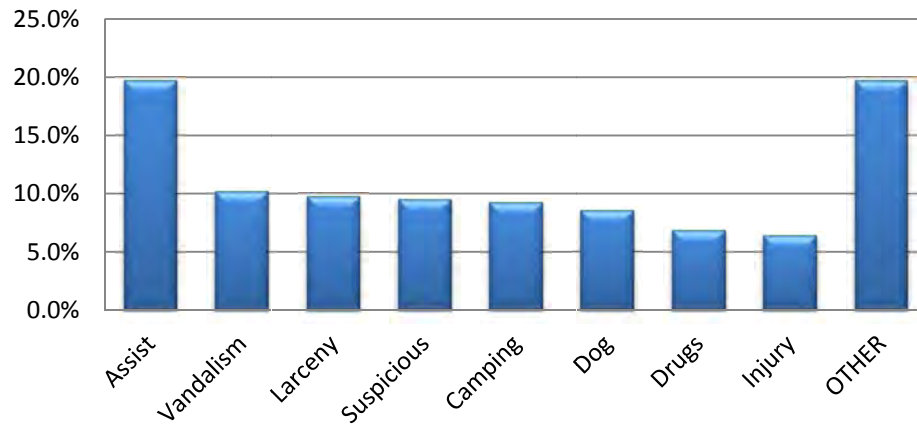
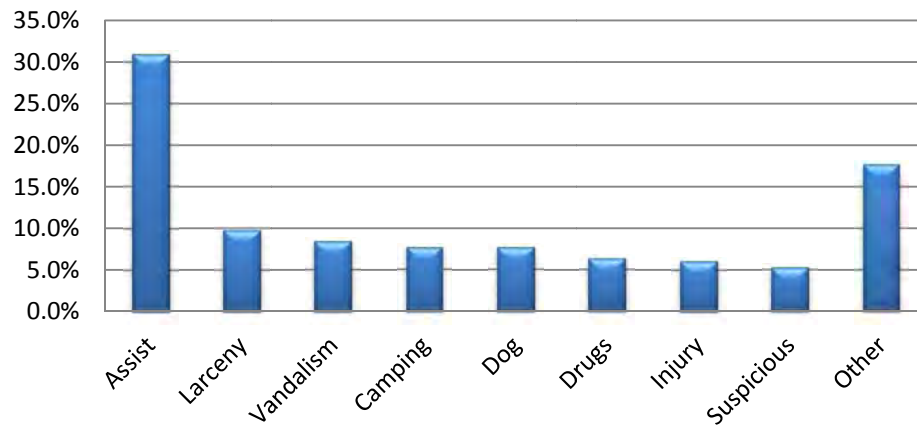
Dog Incidents Included in "Other" = 2.0%



Fort Mason Incidents - 2009

404 Total Incidents

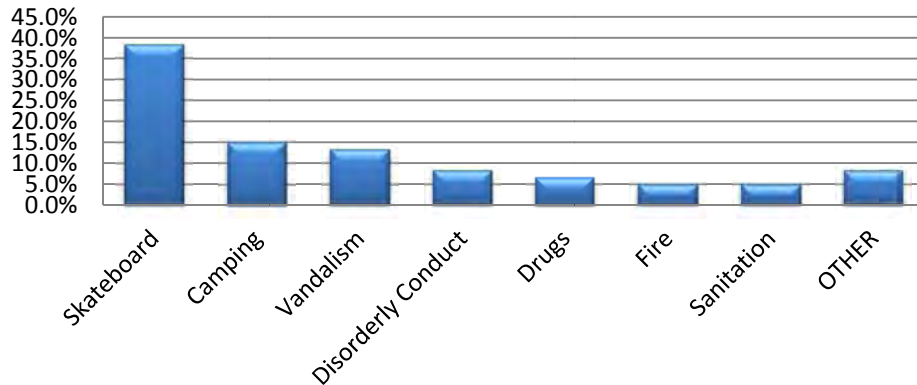


Fort Mason Incidents - 2010**421 Total Incidents****Fort Mason Incidents - 2011****378 Total Incidents**

Fort Miley Incidents - 2001

60 Total Incidents

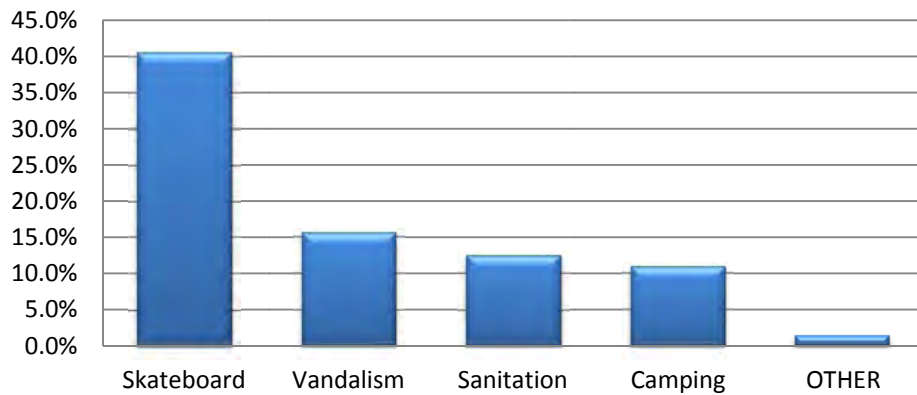
Dog Incidents Included in "Other" = 1.7%



Fort Miley Incidents - 2002

64 Total Incidents

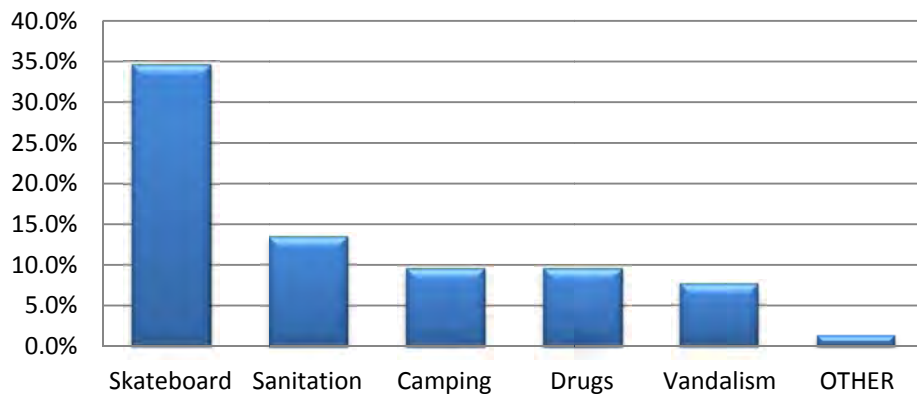
Dog Incidents Included in "Other" = 4.7%



Fort Miley Incidents - 2003

52 Total Incidents

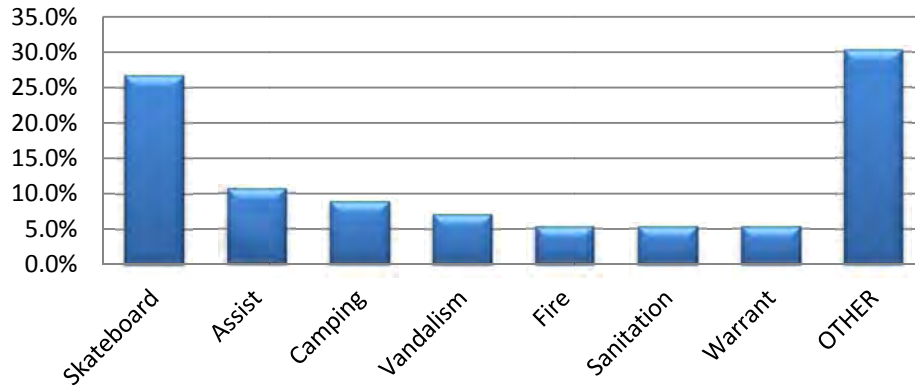
Dog Incidents Included in "Other" = 1.9%



Fort Miley Incidents - 2004

56 Total Incidents

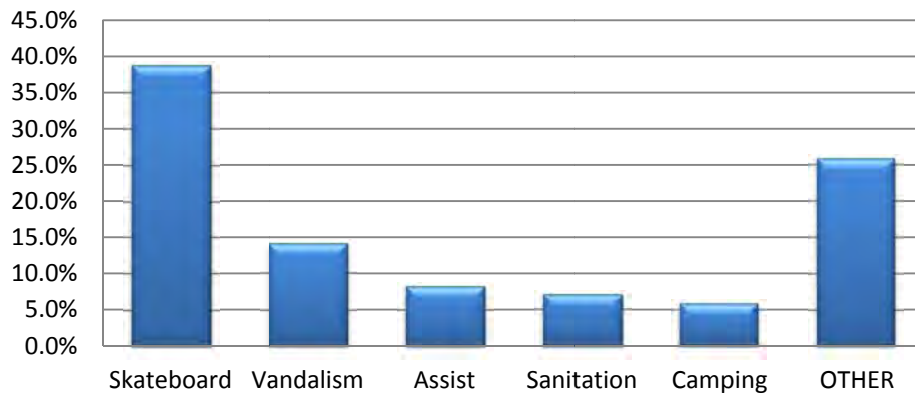
Dog Incidents Included in "Other" = 3.6%



Fort Miley Incidents - 2005

85 Total Incidents

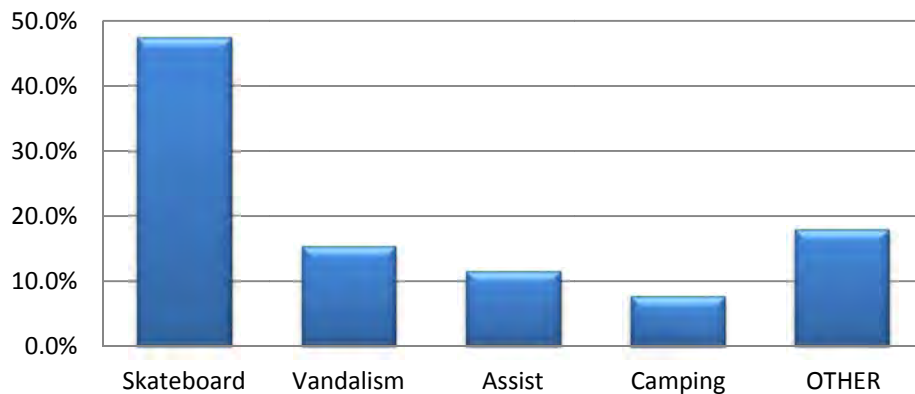
NO Dog Incidents

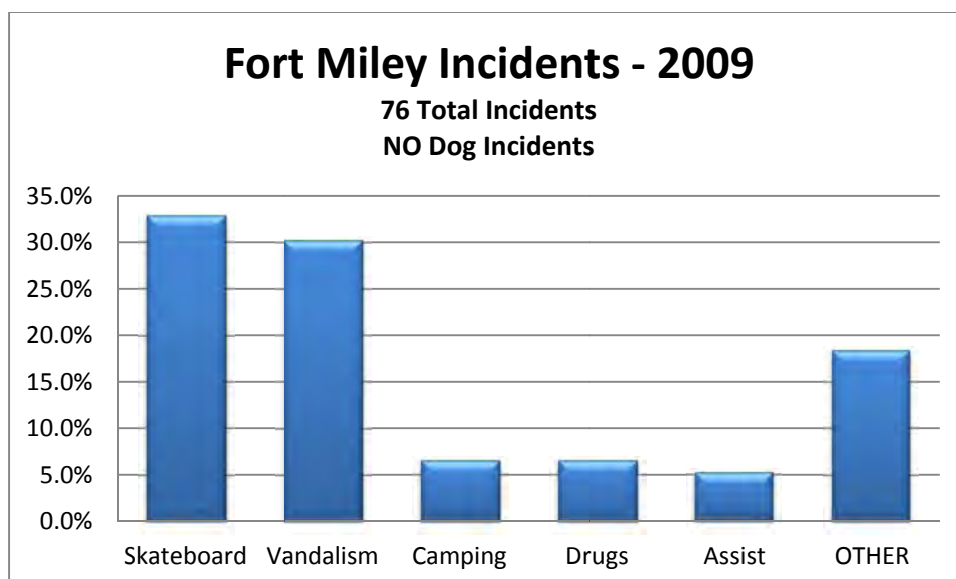
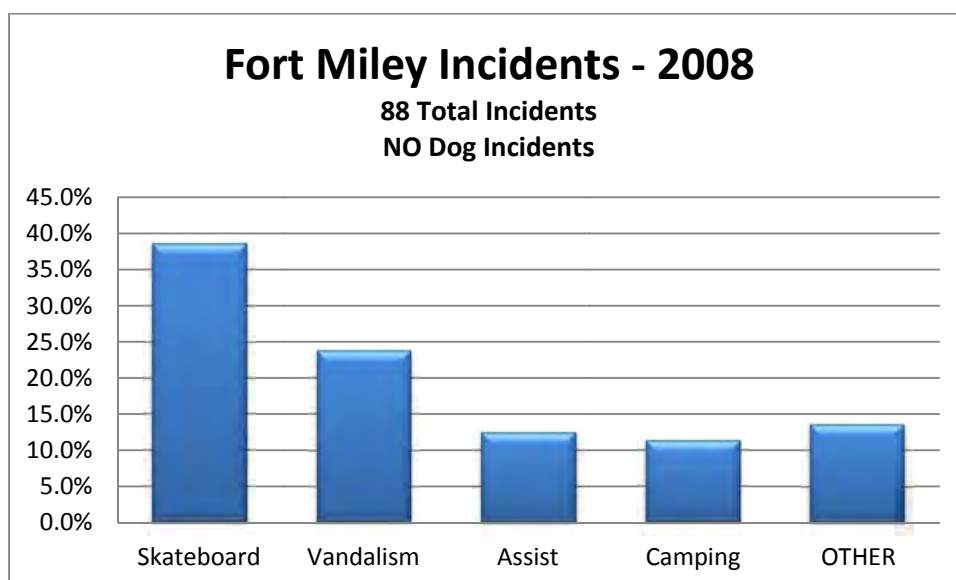
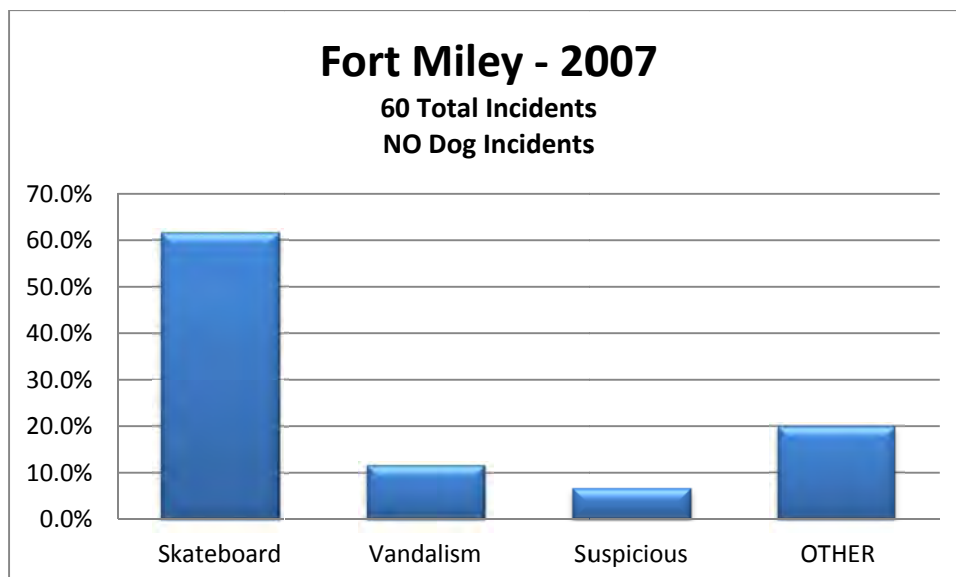


Fort Miley Incidents - 2006

78 Total Incidents

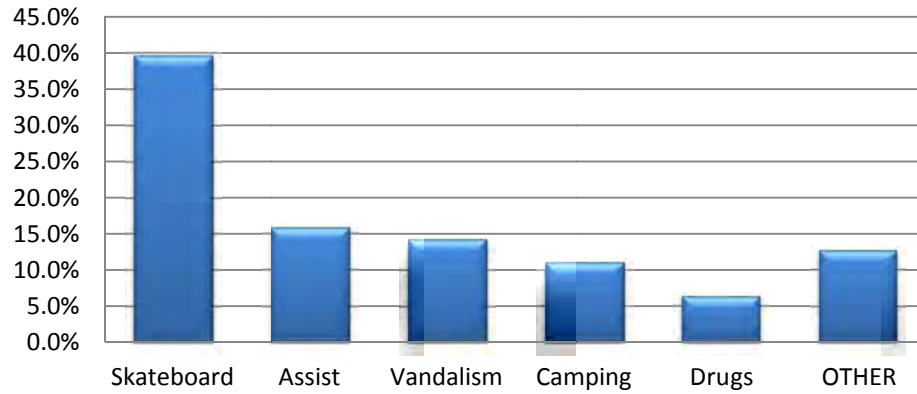
NO Dog Incidents





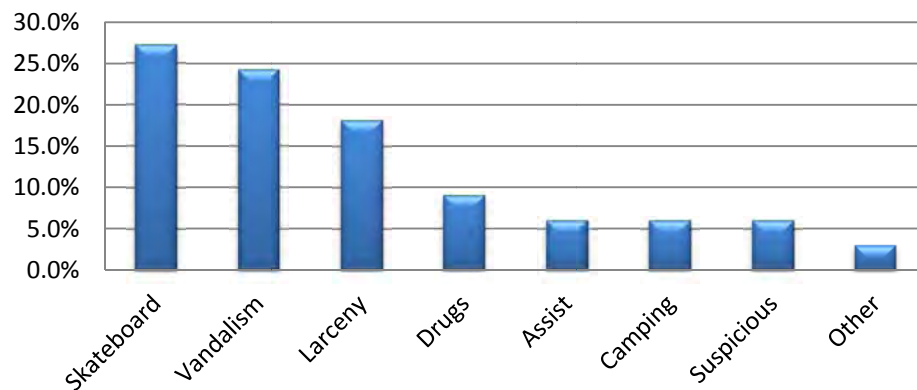
Fort Miley Incidents - 2010

63 Total Incidents
NO Dog Incidents



Fort Miley Incidents - 2011

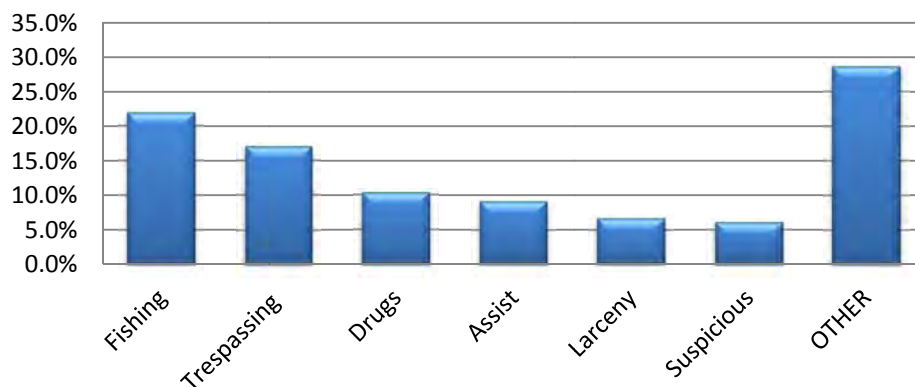
33 Total Incident
NO Dog Incidents



Fort Point Incidents - 2001

164 Total Incidents

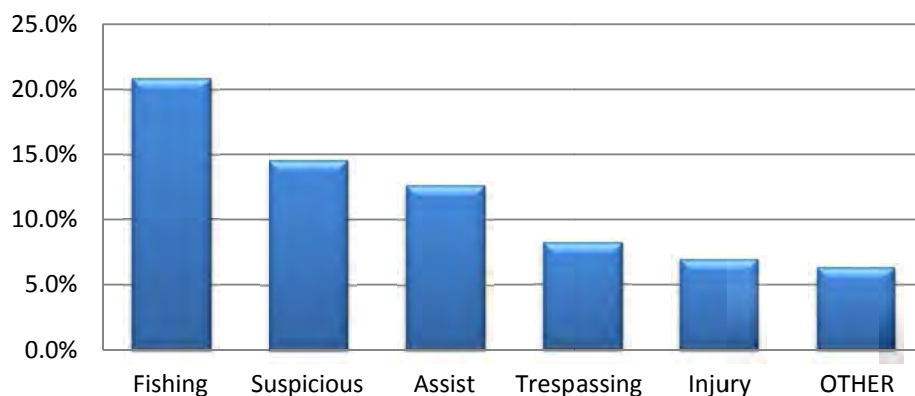
Dog Incidents Included in "Other" = 0.6%



Fort Point Incidents - 2002

158 Total Incidents

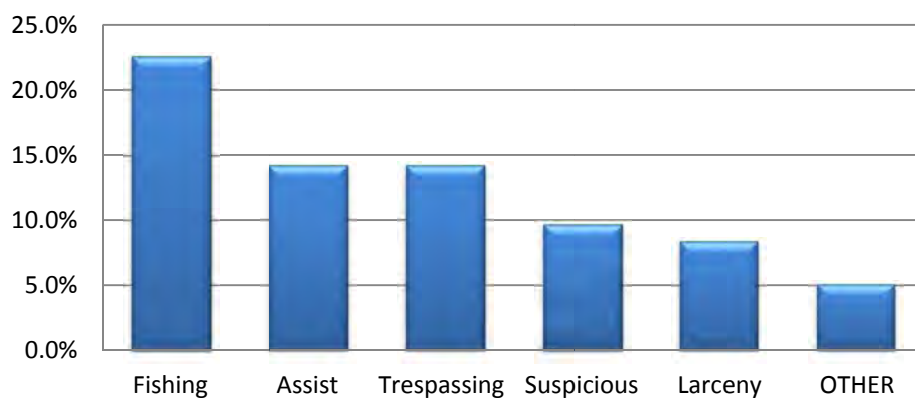
Dog Incidents Included in "Other" = 3.2%



Fort Point Incidents - 2003

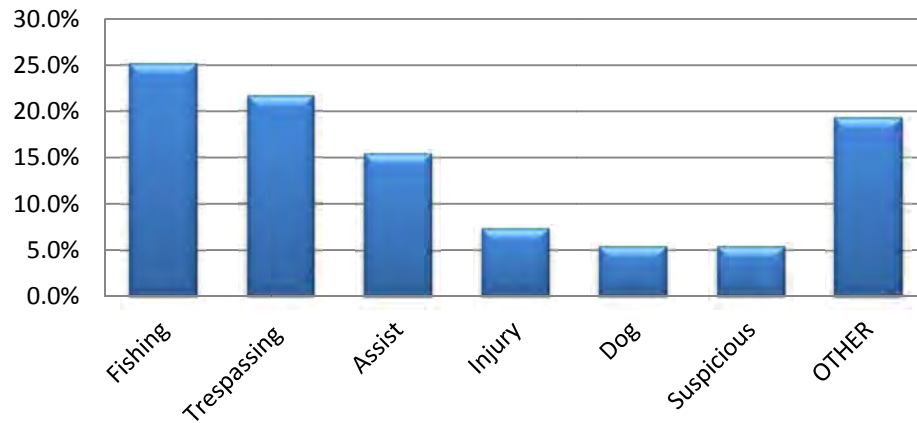
155 Total Incidents

Dog Incidents Included in "Other" = 1.3%



Fort Point Incidents - 2004

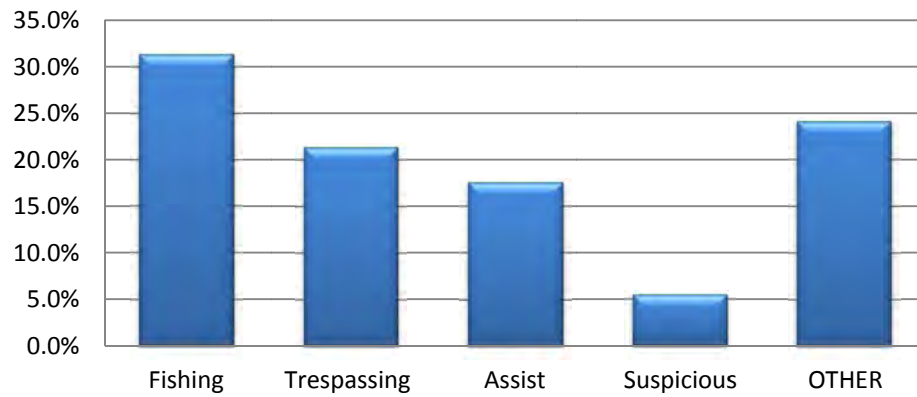
258 Total Incidents



Fort Point Incidents - 2005

290 Total Incidents

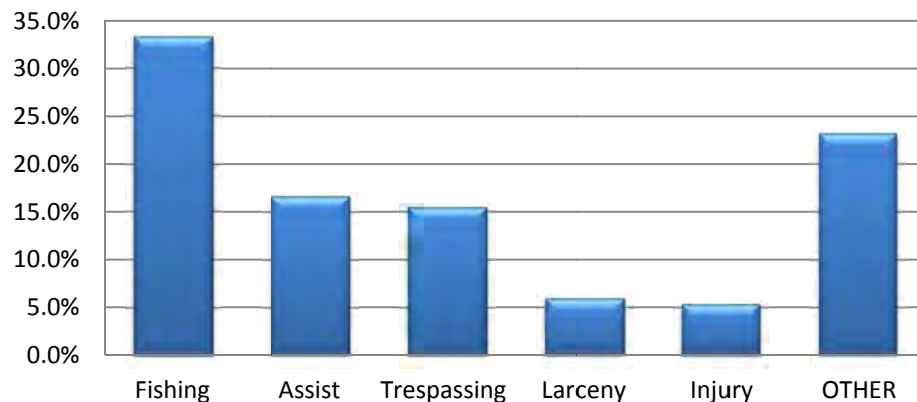
Dog Incidents Included in "Other" = 3.1%

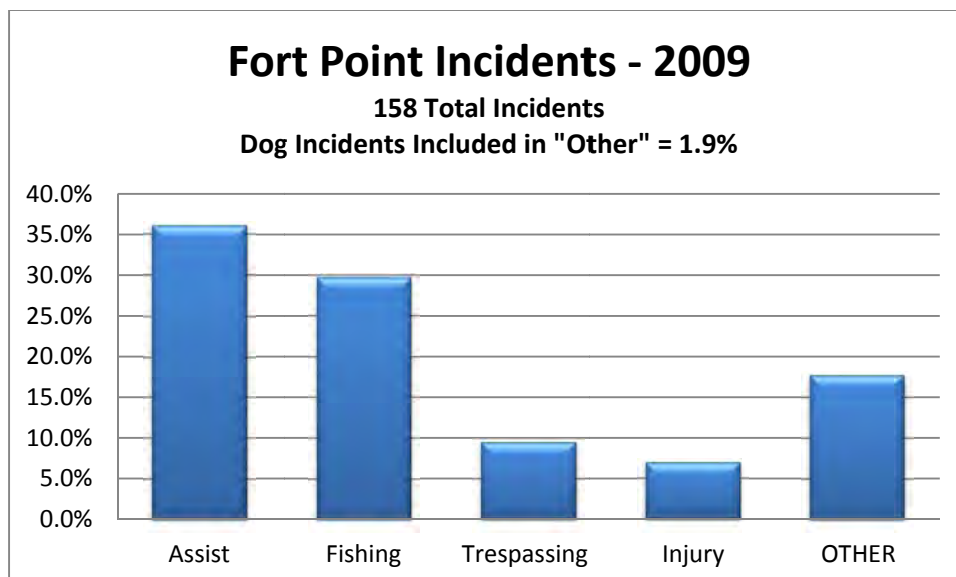
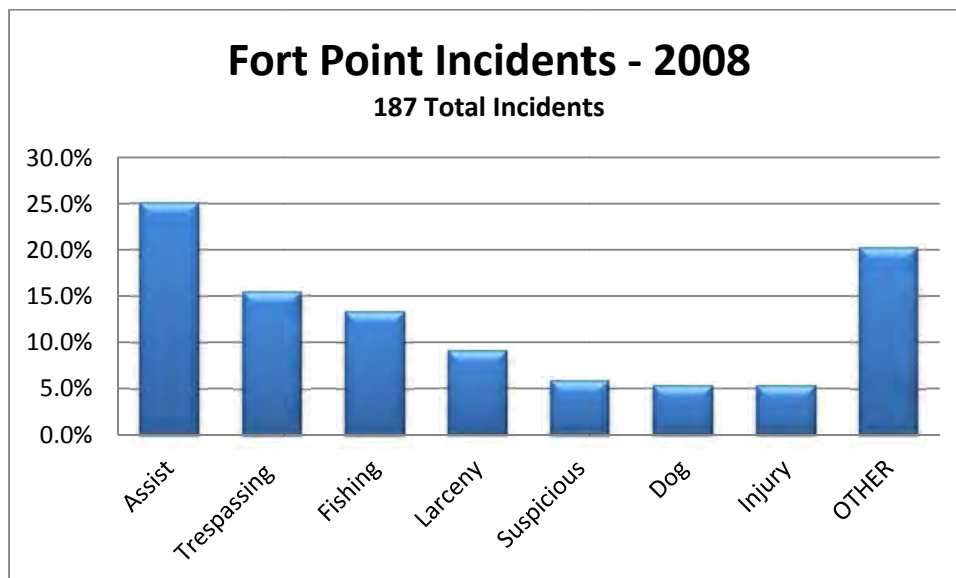
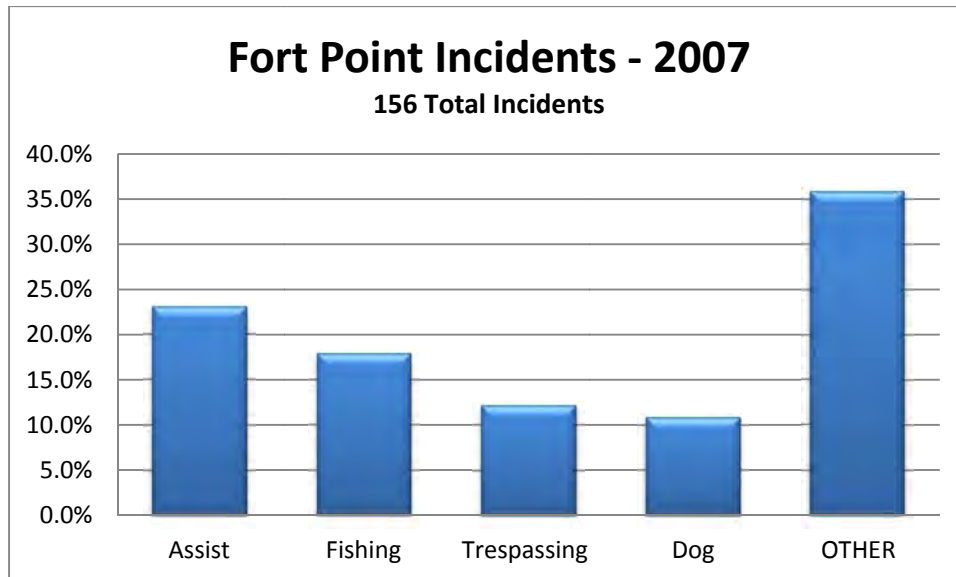


Fort Point Incidents - 2006

168 Total Incidents

Dog Incidents Included in "Other" = 1.2%

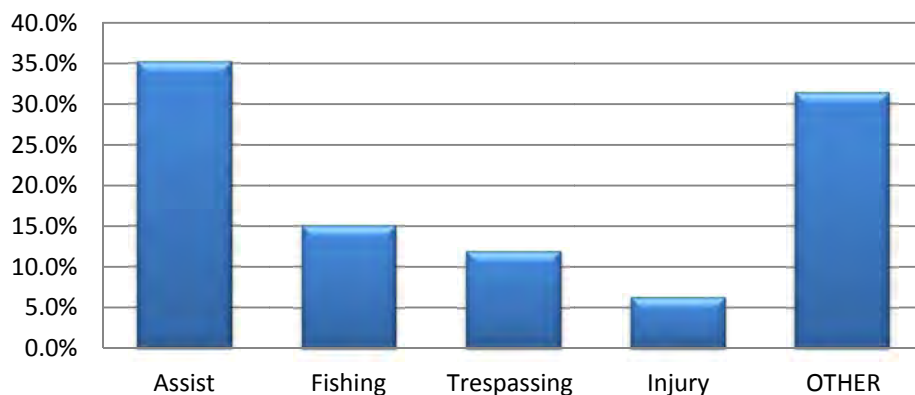




Fort Point Incidents - 2010

159 Total Incidents

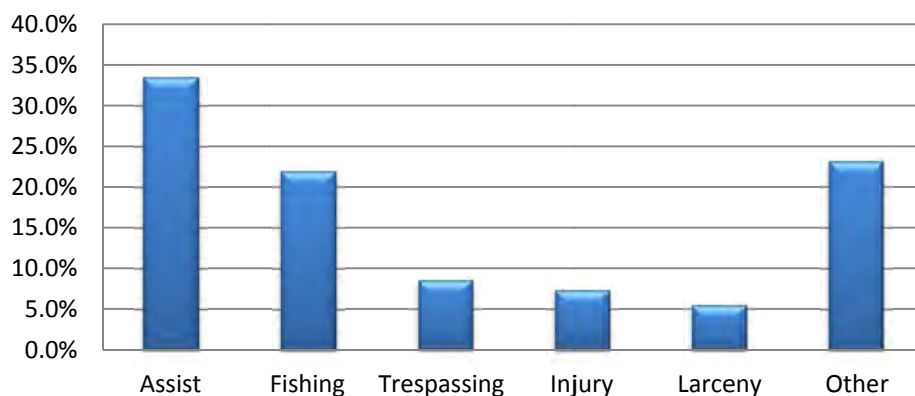
Dog Incidents Included in "Other" = 4.4%



Fort Point Incidents - 2011

164 Total Incidents

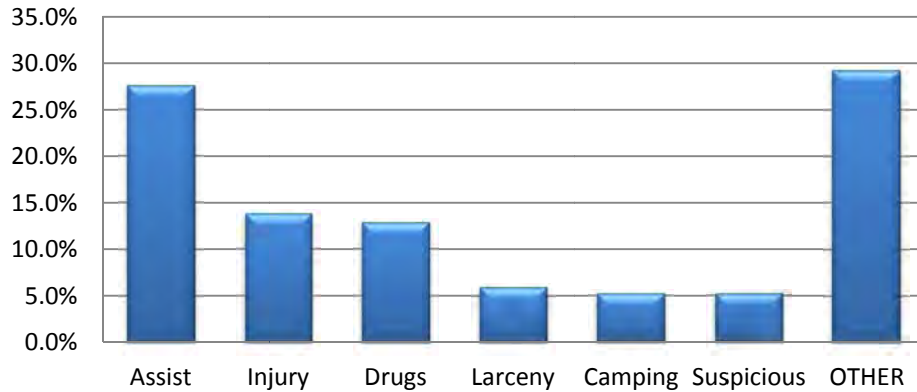
Dog Incidents Included in "Other" = 1.2%



Marin Headlands Incidents - 2001

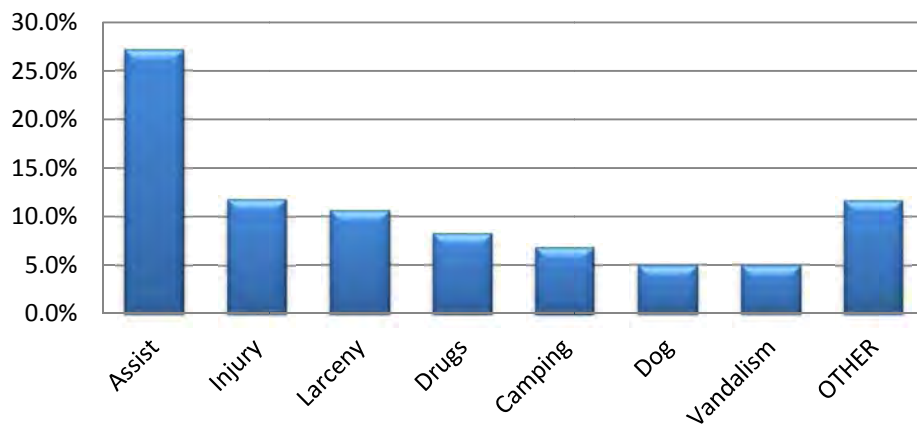
420 Total Incidents

Dog Incidents Included in "Other" = 3.3%



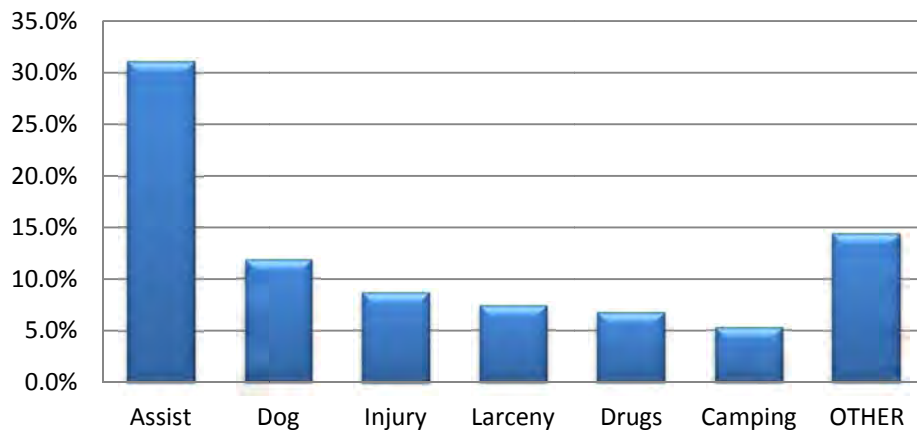
Marin Headlands Incidents - 2002

423 Total Incidents



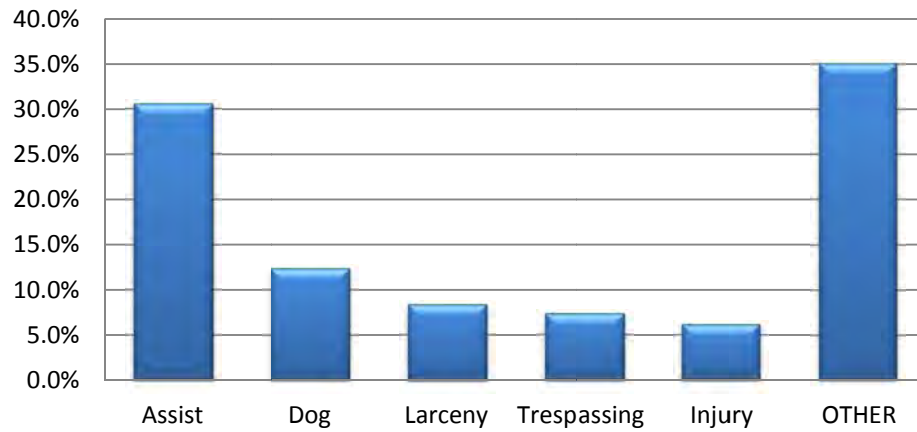
Marin Headlands Incidents - 2003

472 Total Incidents



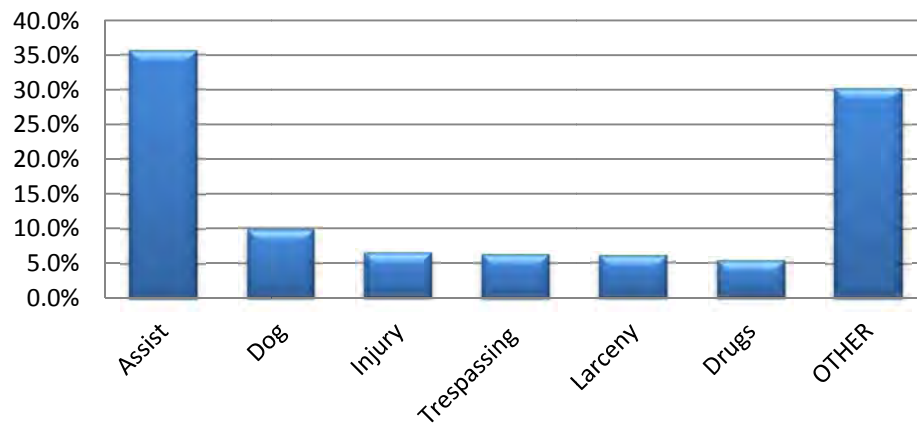
Marin Headlands Incidents - 2004

598 Total Incidents



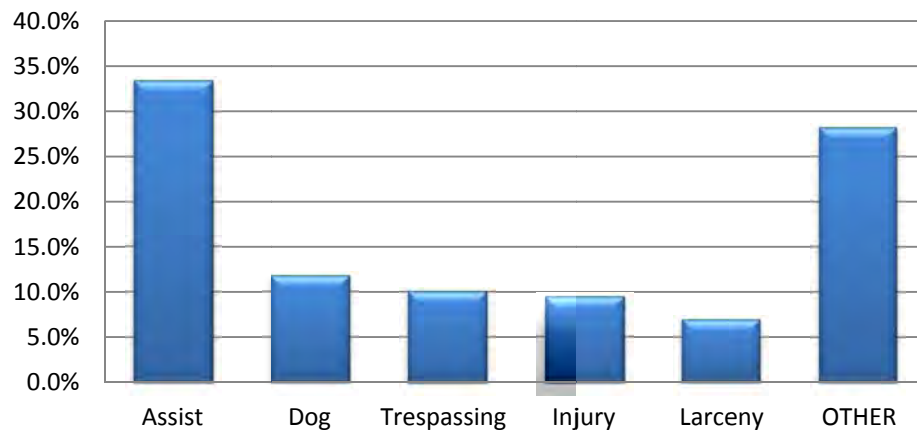
Marin Headlands Incidents - 2005

446 Total Incidents



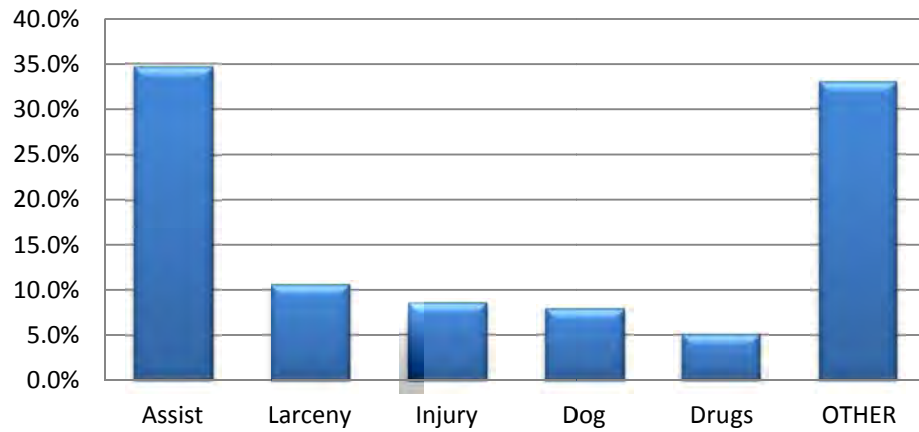
Marin Headlands Incidents - 2006

517 Total Incidents



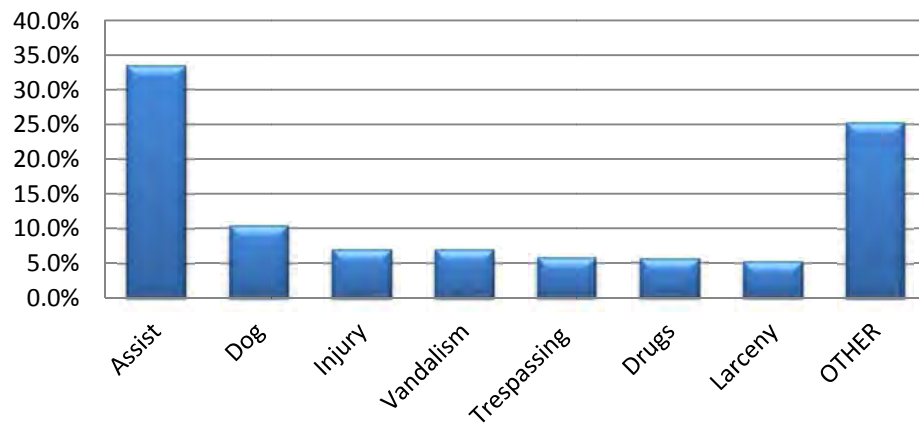
Marin Headlands Incidents - 2007

593 Total Incidents



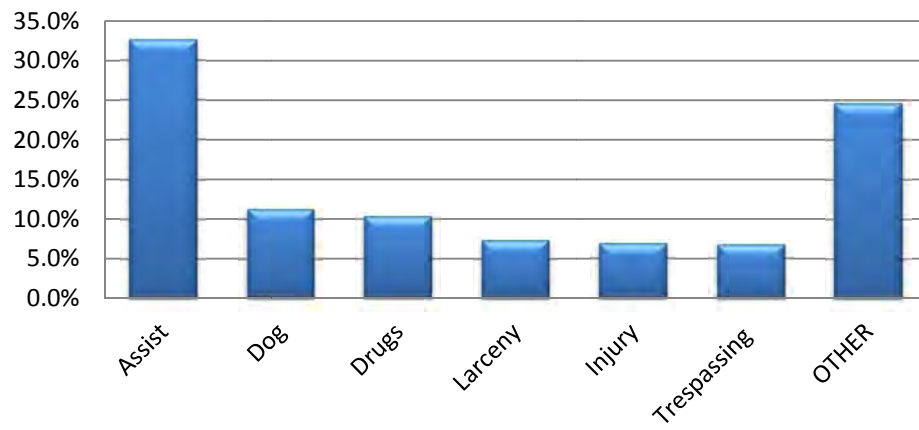
Marin Headlands Incidents - 2008

585 Total Incidents



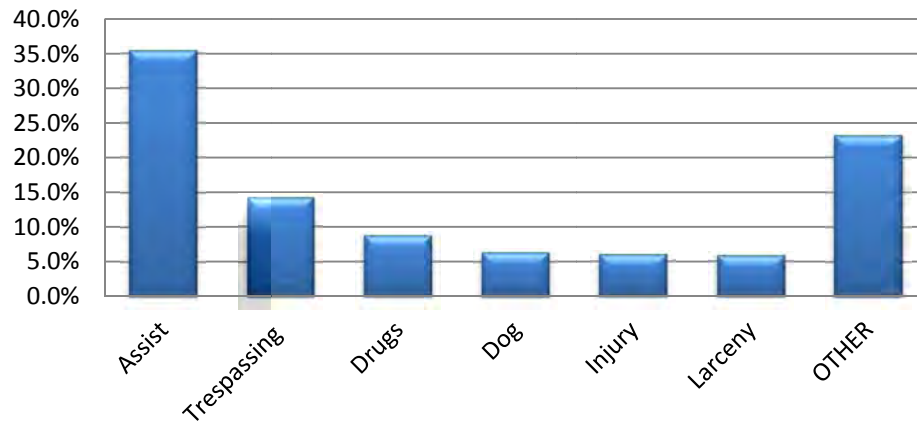
Marin Headlands Incidents - 2009

665 Total Incidents



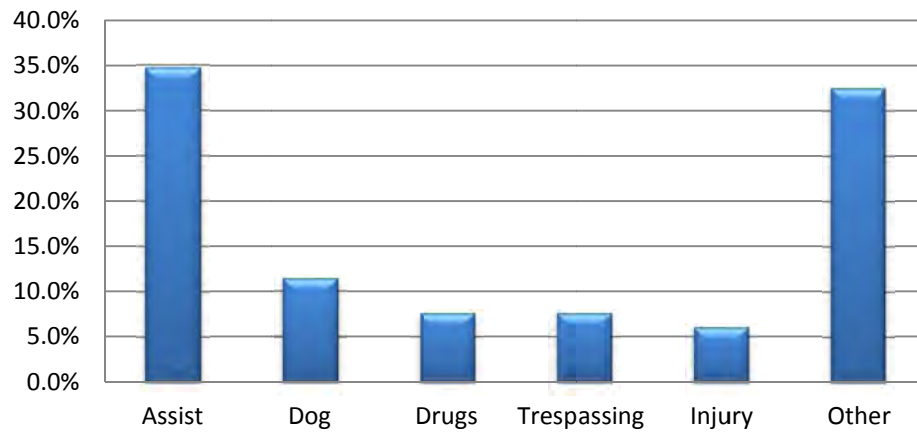
Marin Headlands Incidents - 2010

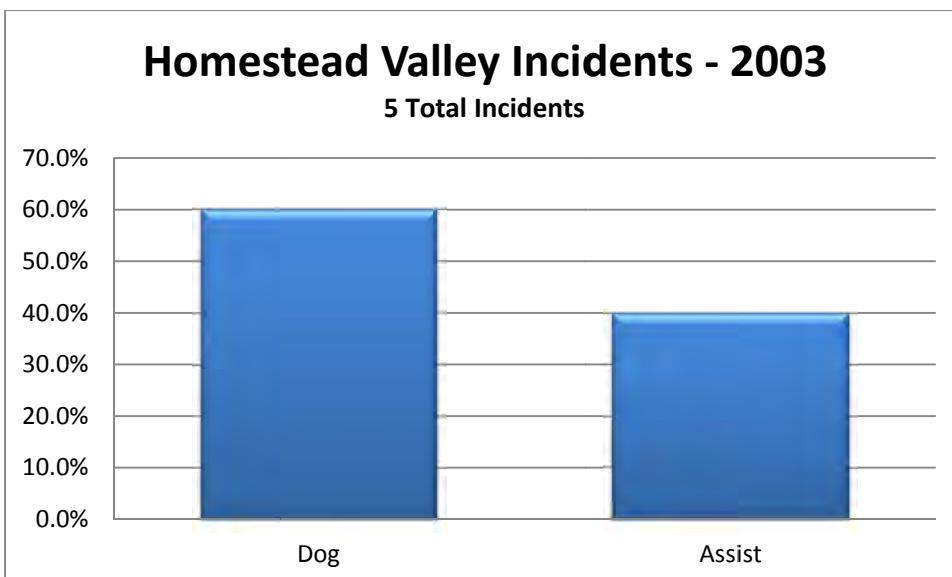
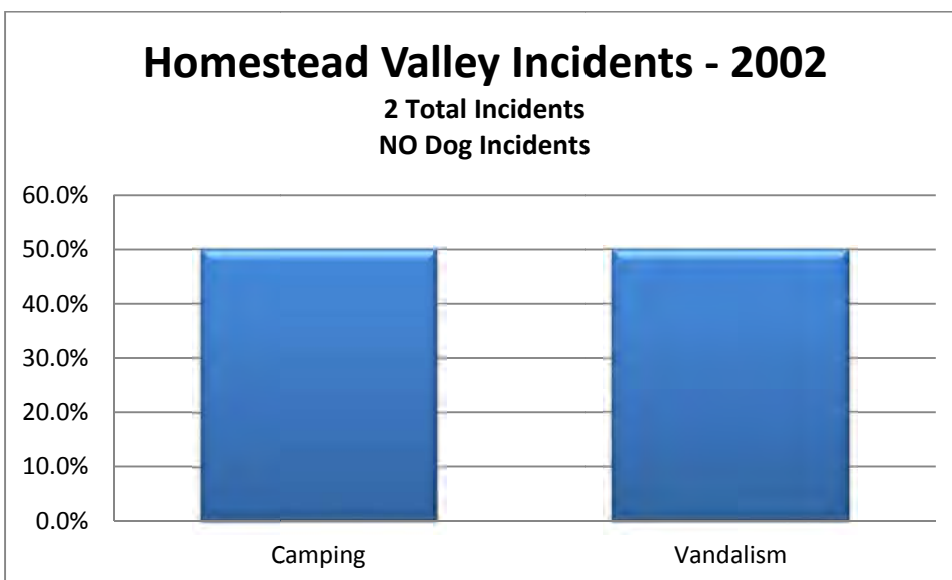
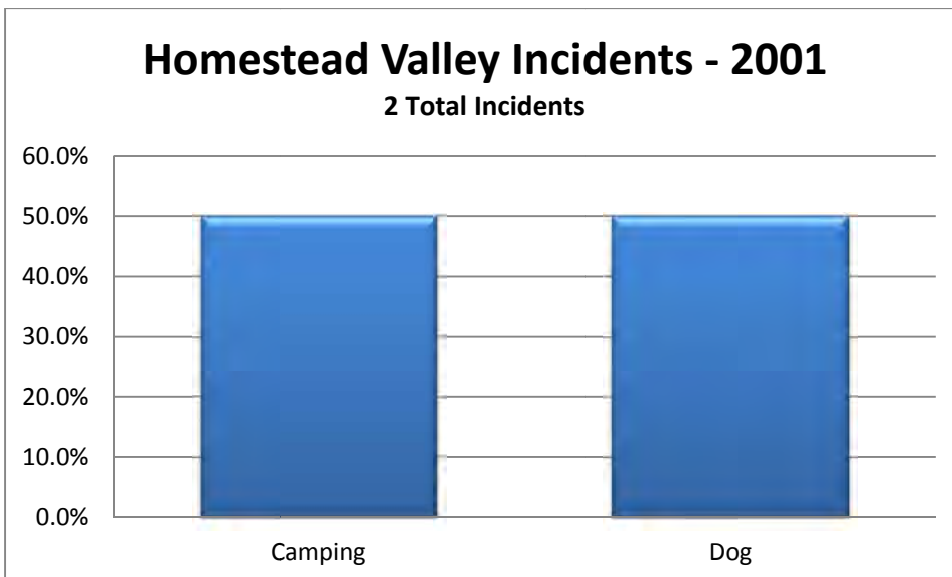
612 Total Incidents



Marin Headlands Incidents - 2011

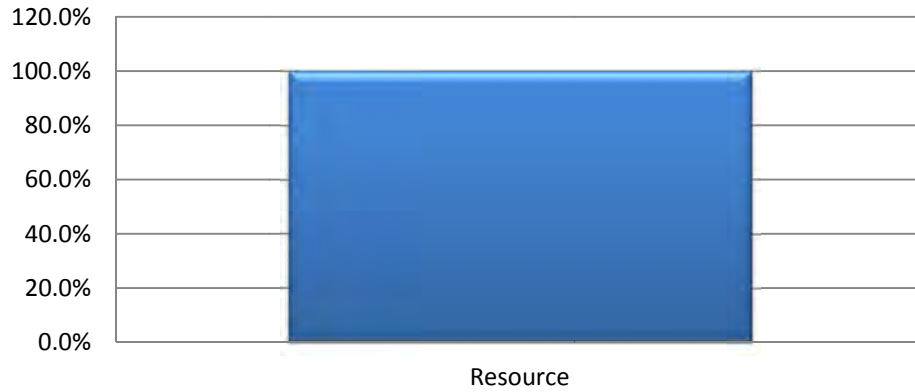
630 Total Incidents





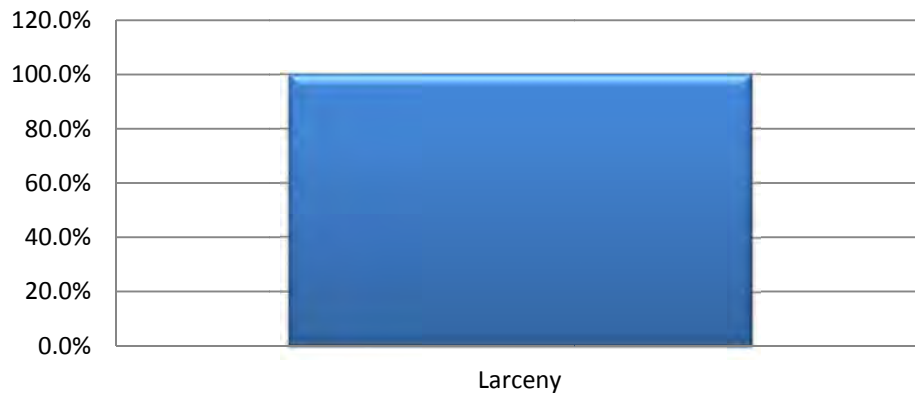
Homestead Valley Incidents - 2005

1 Total Incident
NO Dog Incidents



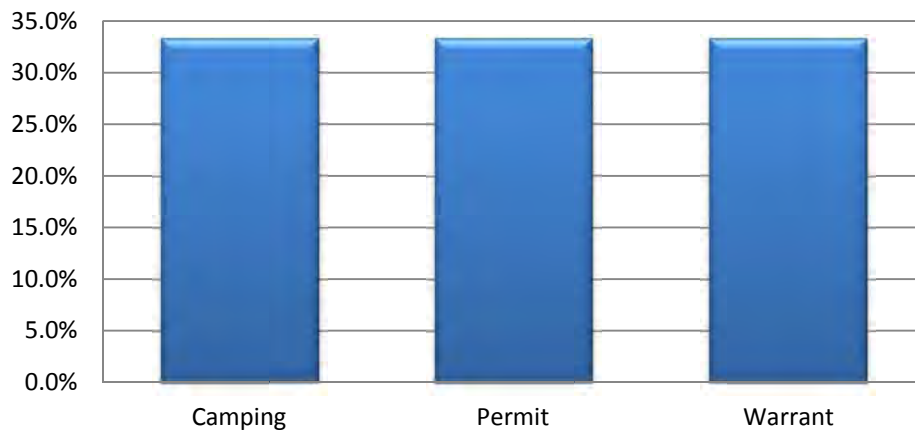
Homestead Valley Incidents - 2007

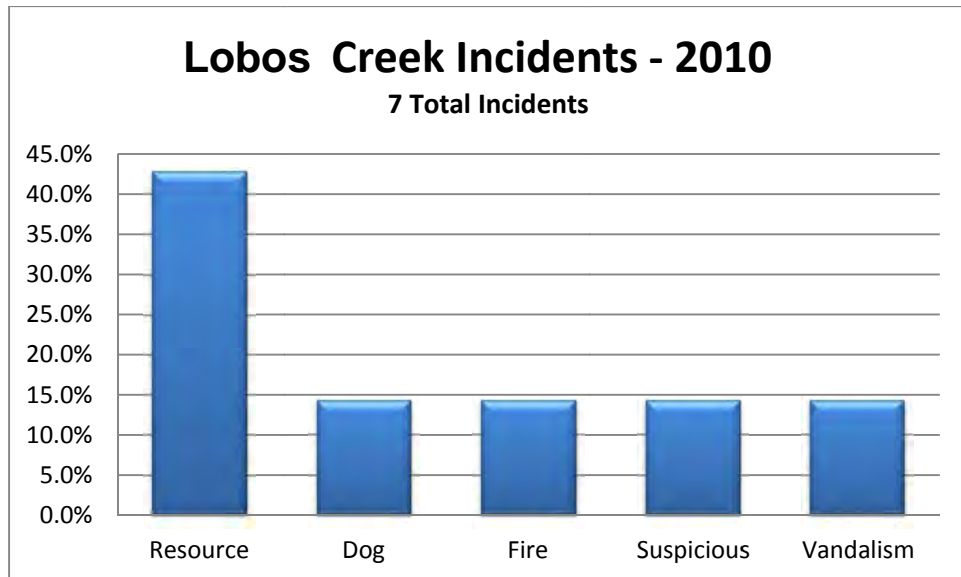
1 Total Incident
NO Dog Incidents



Homestead Valley Incidents - 2010

3 Total Incidents

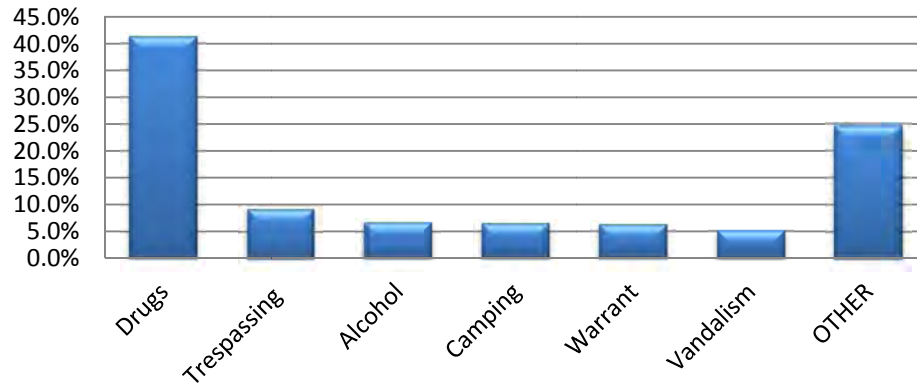




Lands End Incidents - 2001

445 Total Incidents

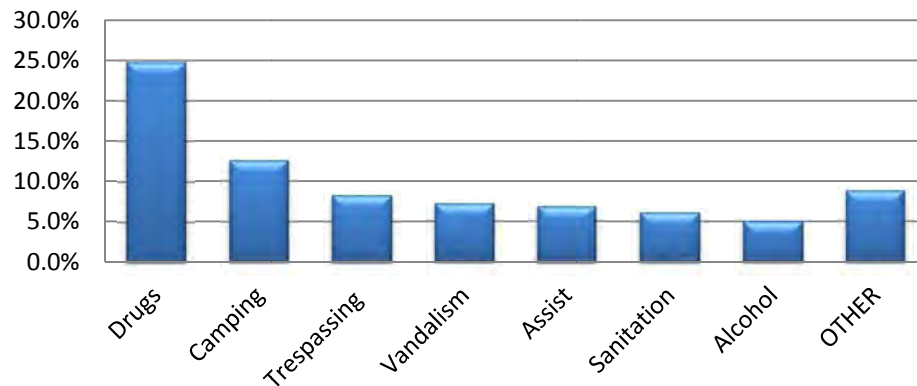
Dog Incidents Included in "Other" = 2.0%



Lands End Incidents - 2002

278 Total Incidents

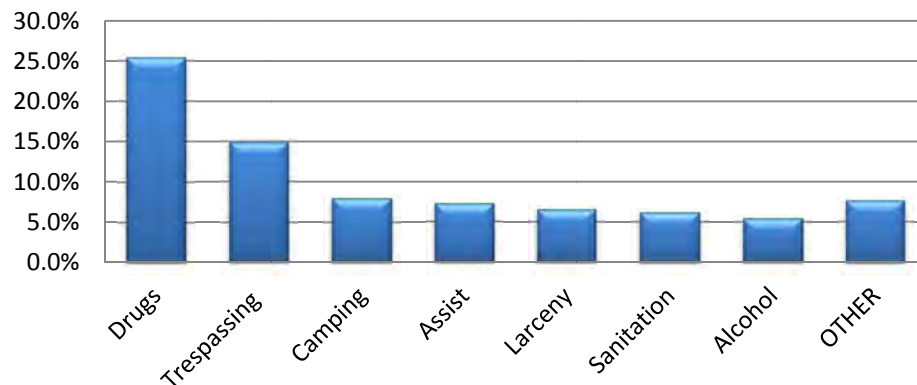
Dog Incidents Included in "Other" = 1.8%



Lands End Incidents - 2003

275 Total Incidents

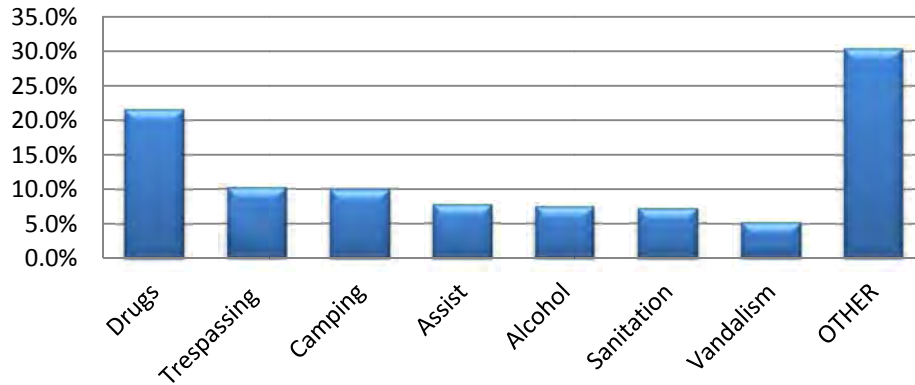
Dog Incidents Included in "Other" = 3.3%



Lands End Incidents - 2004

361 Total Incidents

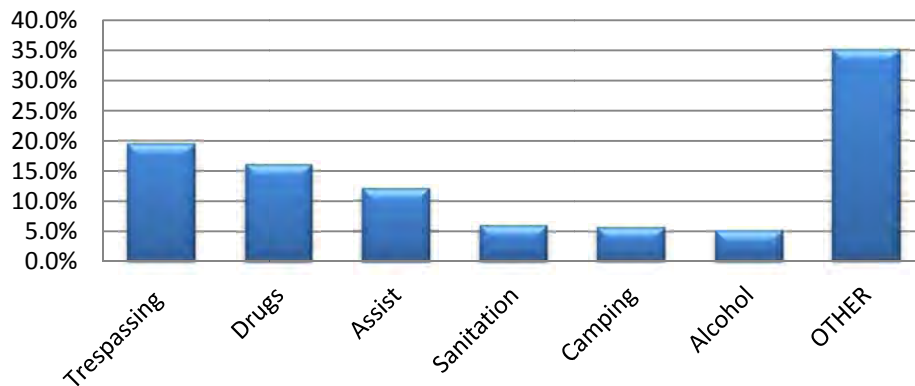
Dog Incidents Included in "Other" = 4.2%



Lands End Incidents - 2005

347 Total Incidents

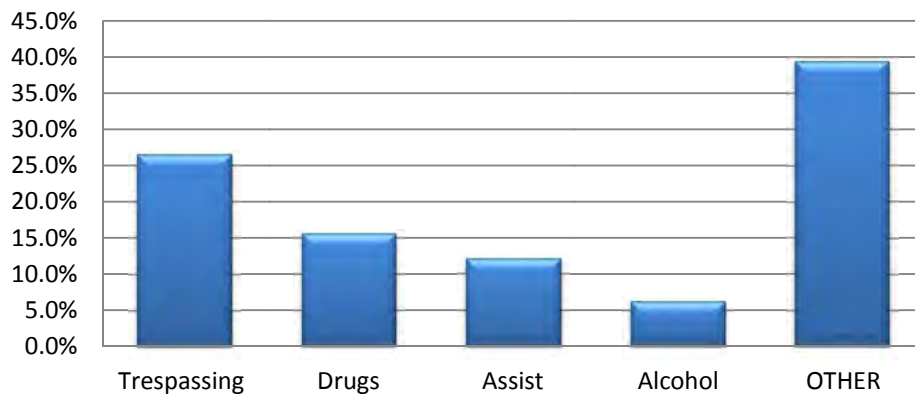
Dog Incidents Included in "Other" = 4.3%



Lands End Incidents - 2006

256 Total Incidents

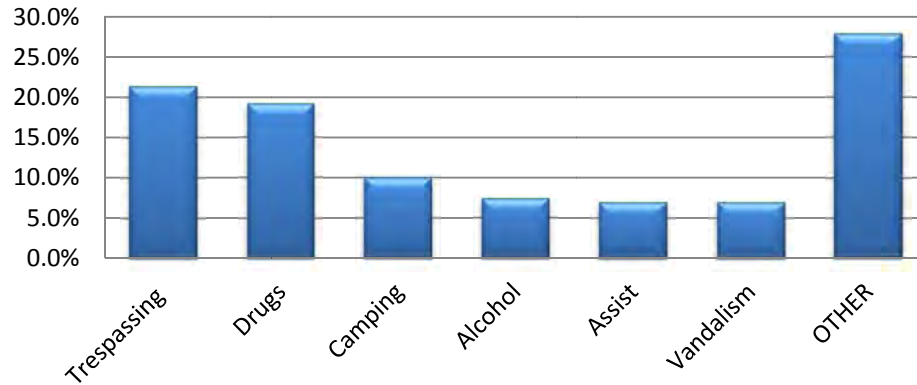
Dog Incidents Included in "Other" = 2.0%



Lands End Incidents - 2007

229 Total Incidents

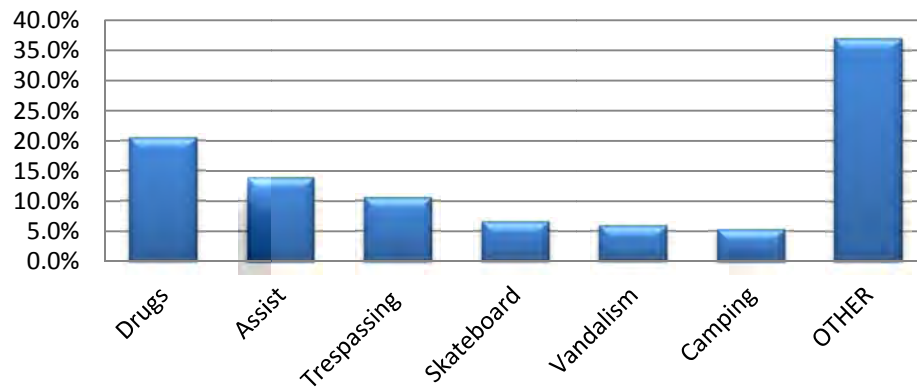
Dog Incidents Included in "Other" = 2.2%



Lands End Incidents - 2008

151 Total Incidents

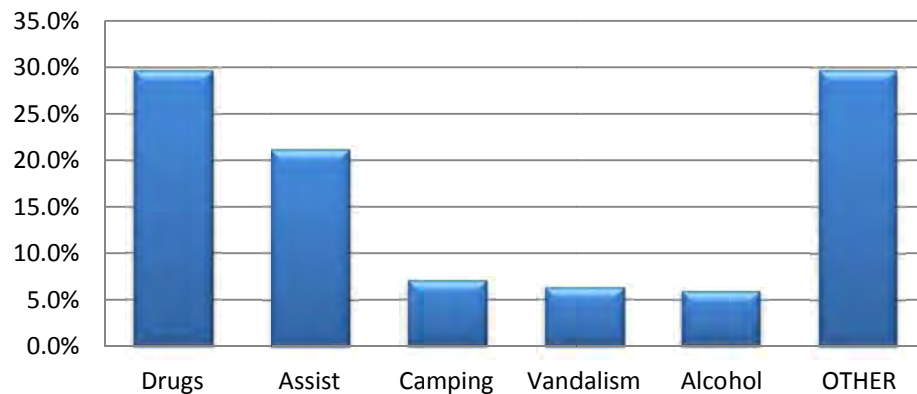
Dog Incidents Included in "Other" = 3.3%



Lands End Incidents - 2009

269 Total Incidents

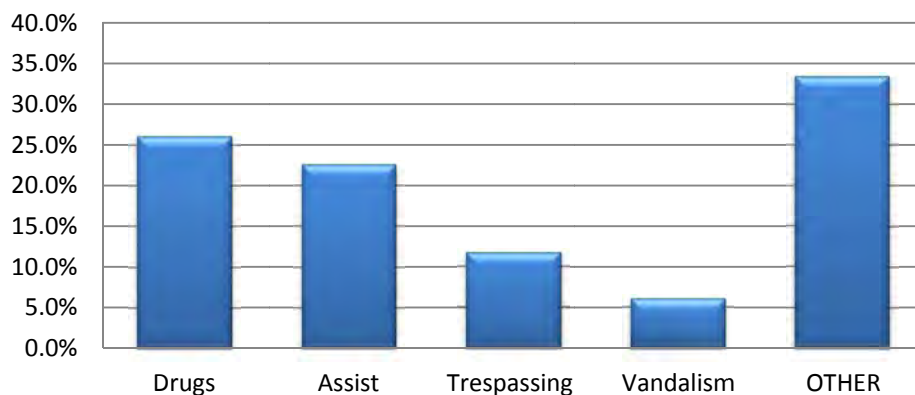
NO Dog Incidents



Lands End Incidents - 2010

230 Total Incidents

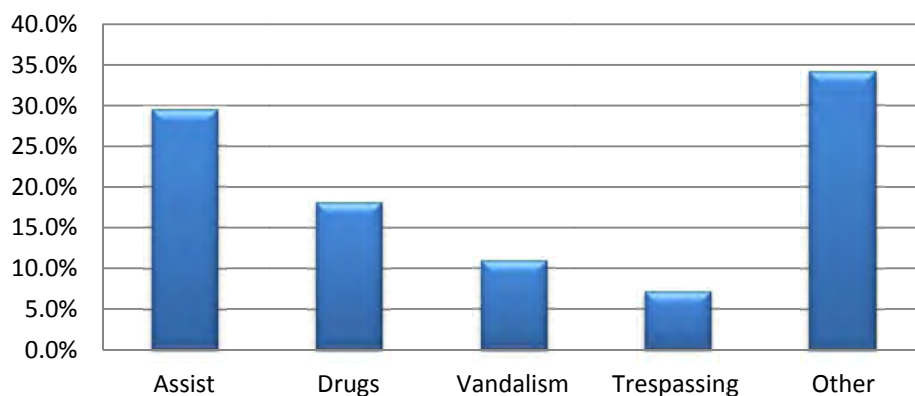
Dog Incidents Included in "Other" = 2.2%



Lands End Incidents - 2011

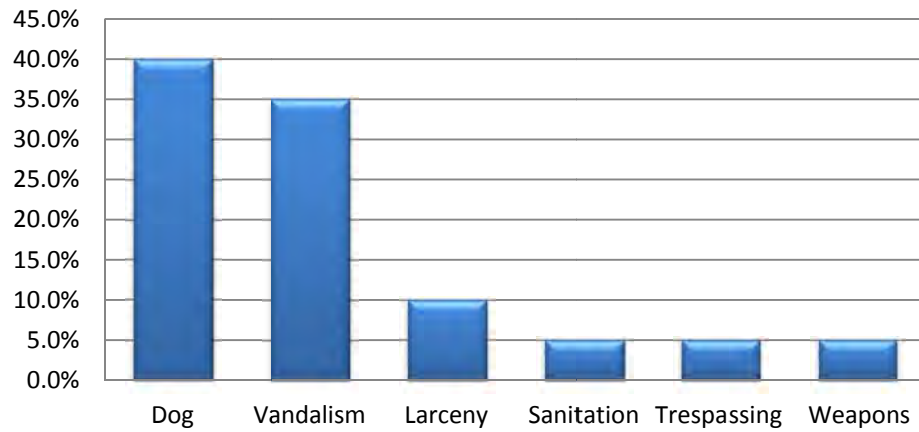
237 Total Incidents

Dog Incidents Included in "Other" = 2.1%



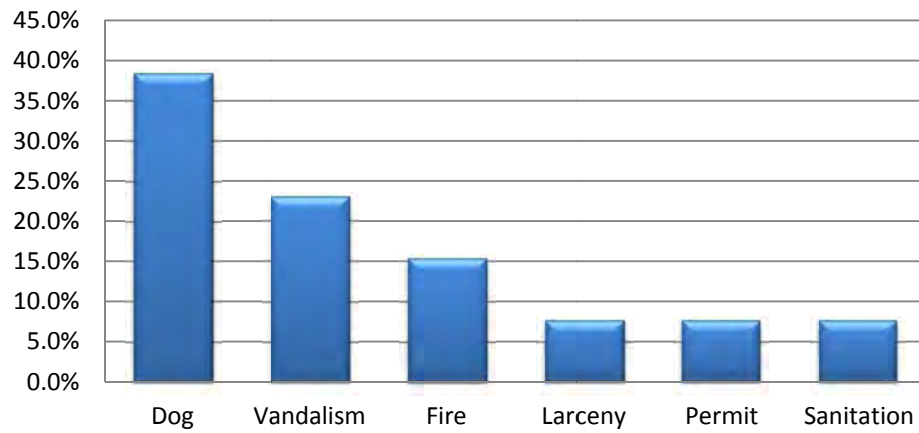
Milagra Ridge Incidents - 2001

20 Total Incidents



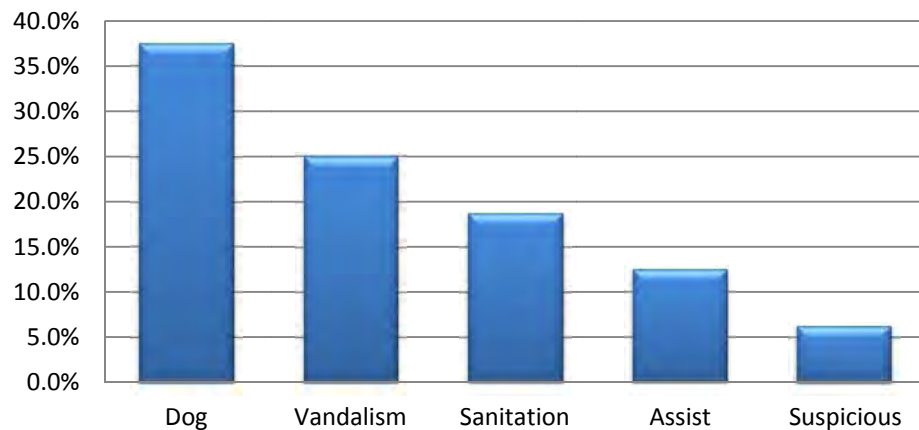
Milagra Ridge Incidents - 2002

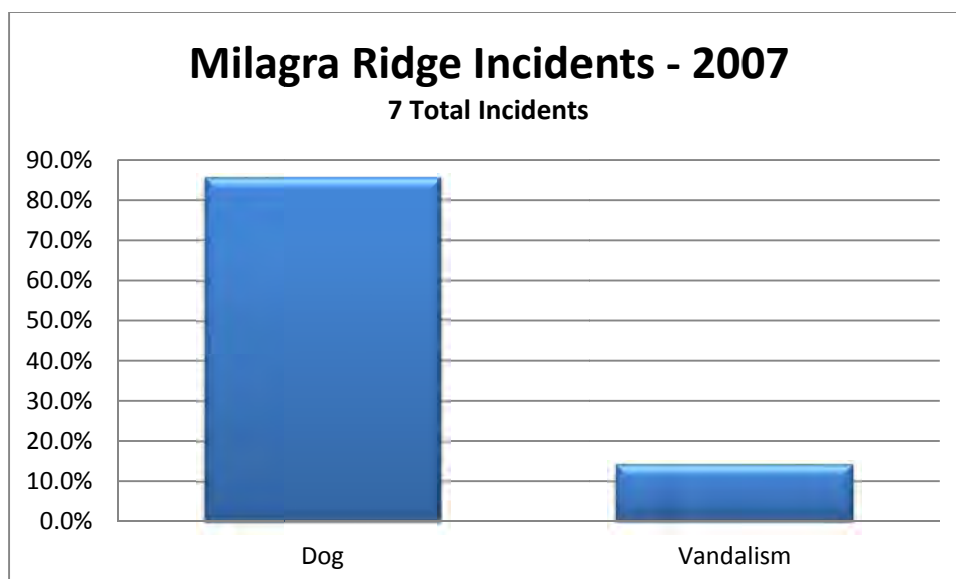
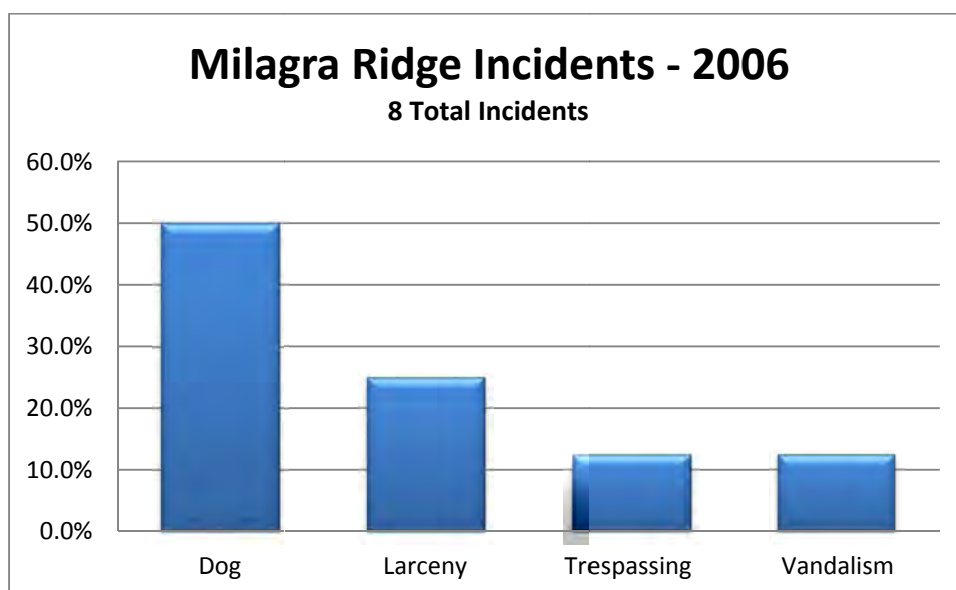
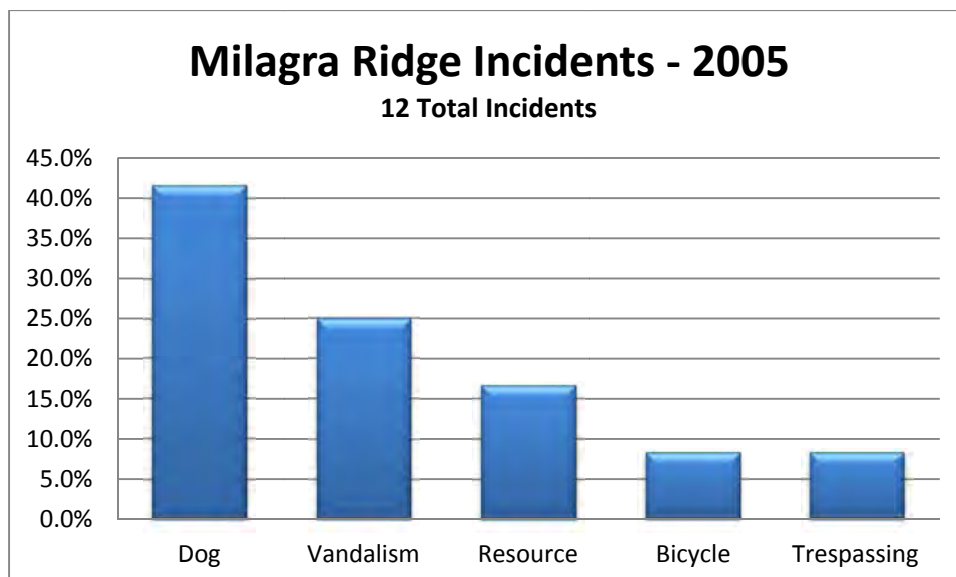
13 Total Incidents

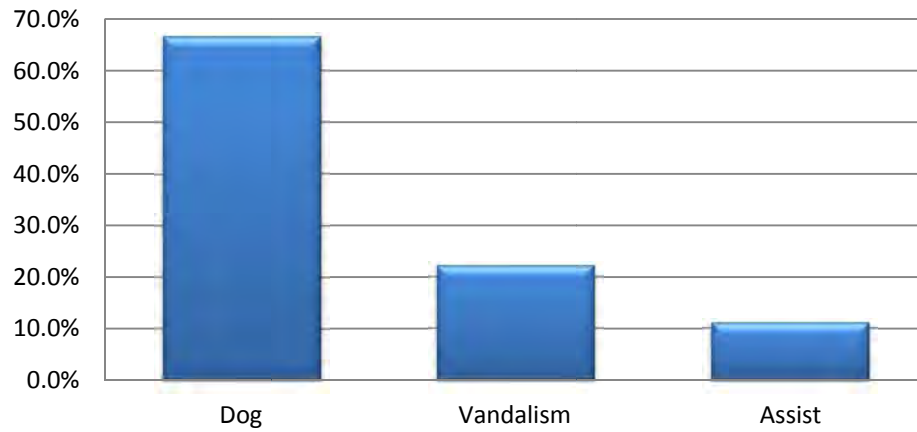
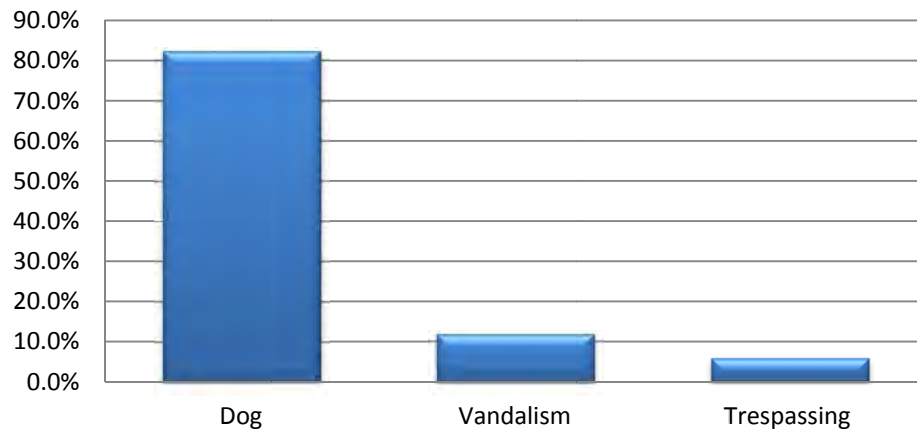
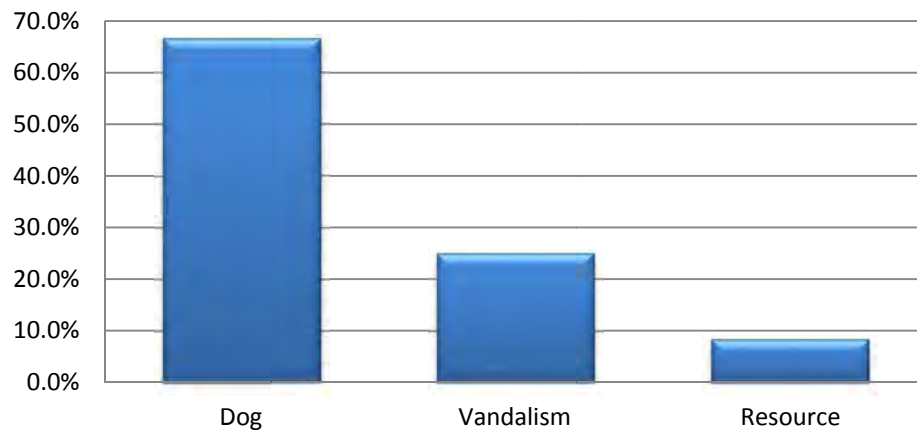


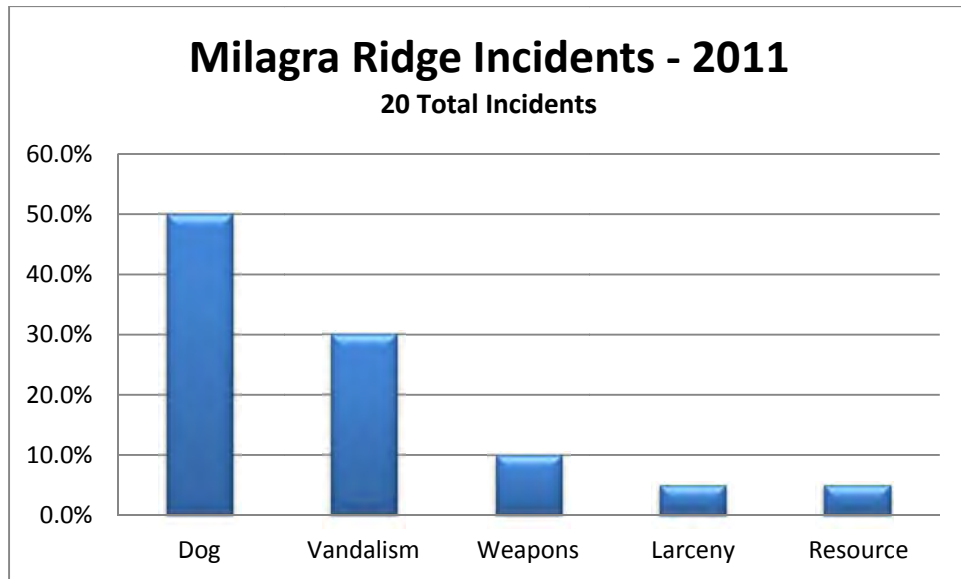
Milagra Ridge Incidents - 2003

16 Total Incidents



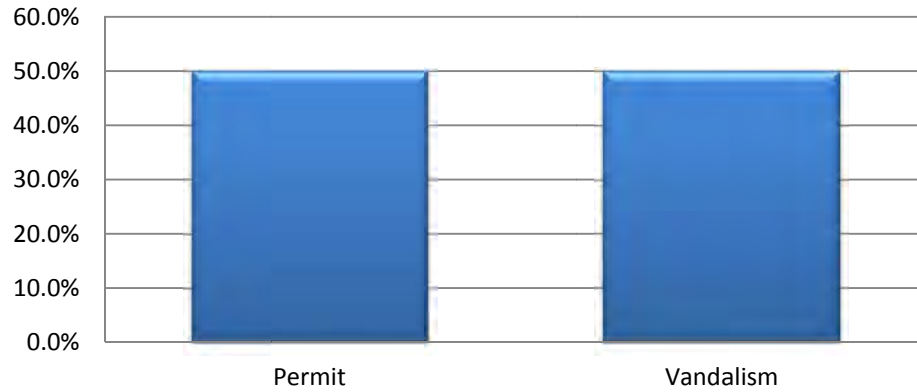


Milagra Ridge Incidents - 2008**9 Total Incidents****Milagra Ridge Incidents - 2009****17 Total Incidents****Milagra Ridge Incidents - 2010****12 Total Incidents**



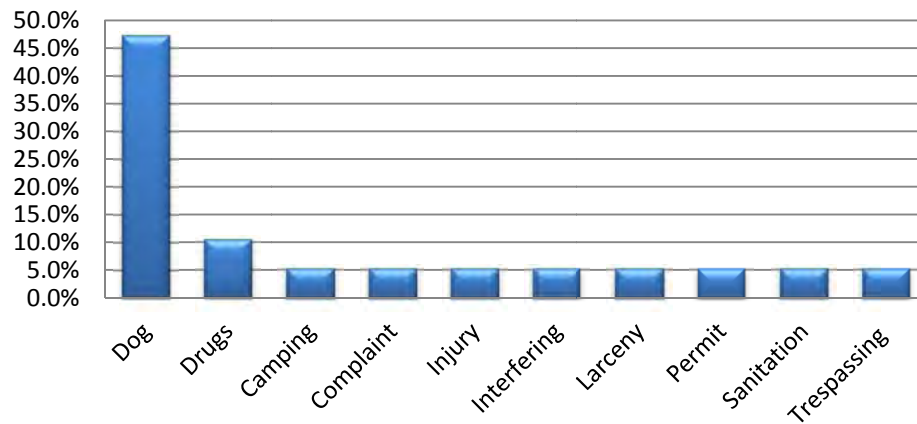
Mori Point Incidents - 2002

2 Total Incidents
NO Dog Incidents



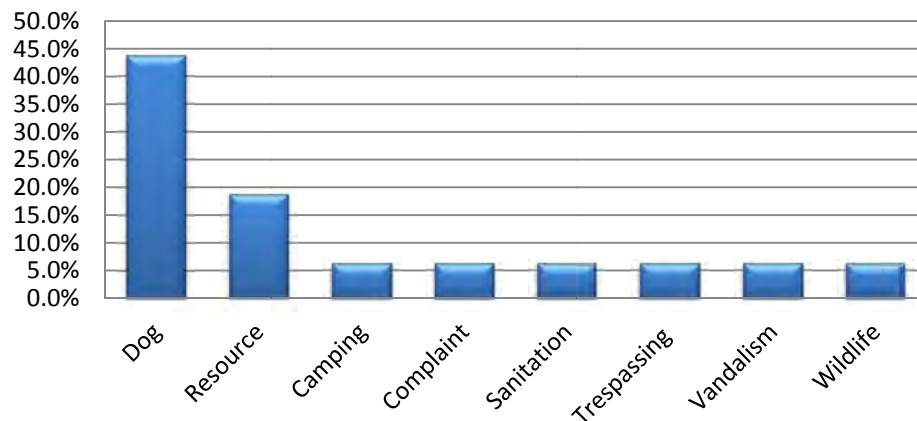
Mori Point Incidents - 2003

19 Total Incidents



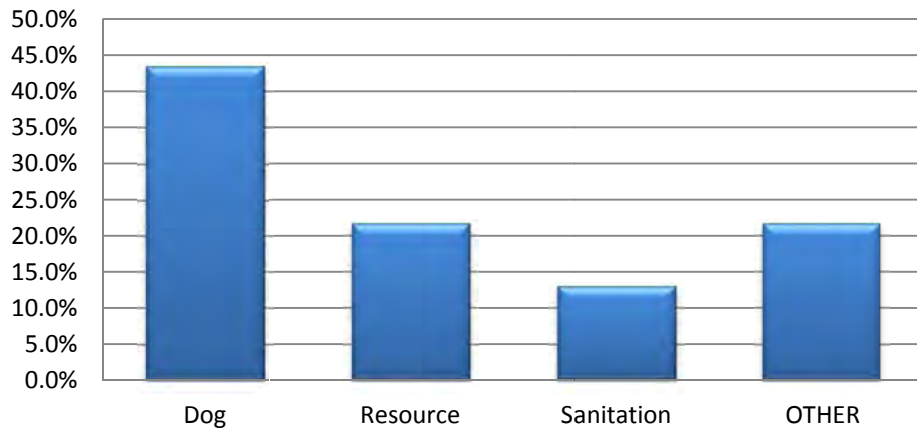
Mori Point Incidents - 2004

16 Total Incidents



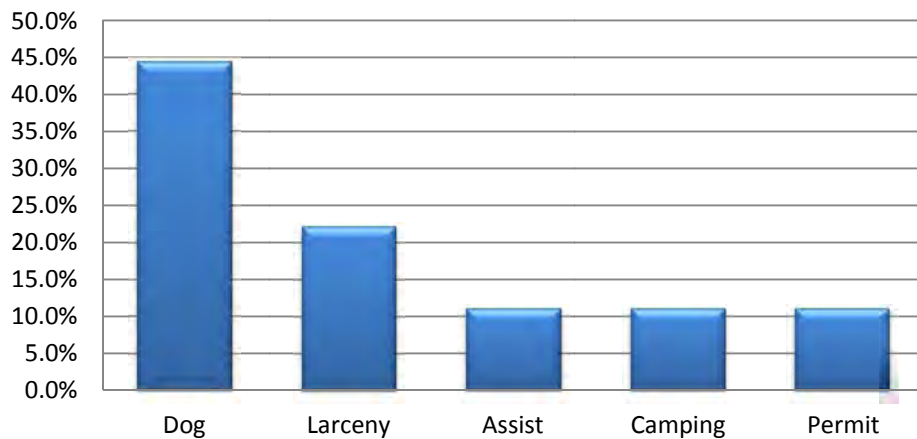
Mori Point Incidents - 2005

23 Total Incidents



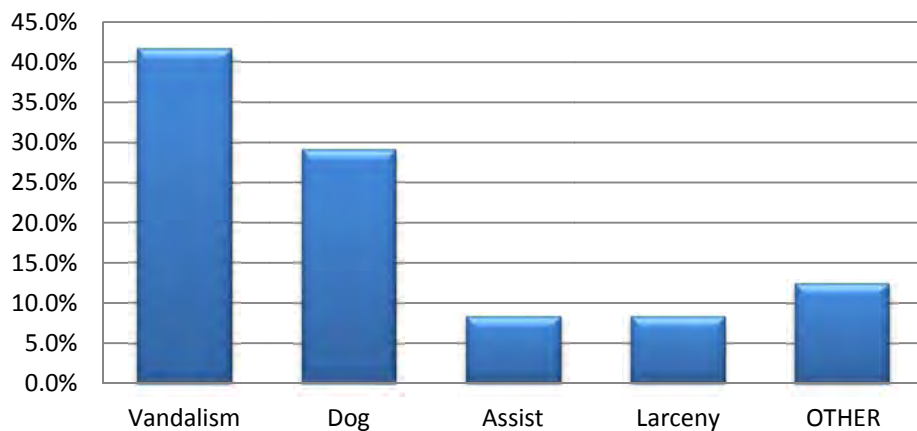
Mori Point Incidents - 2006

9 Total Incidents



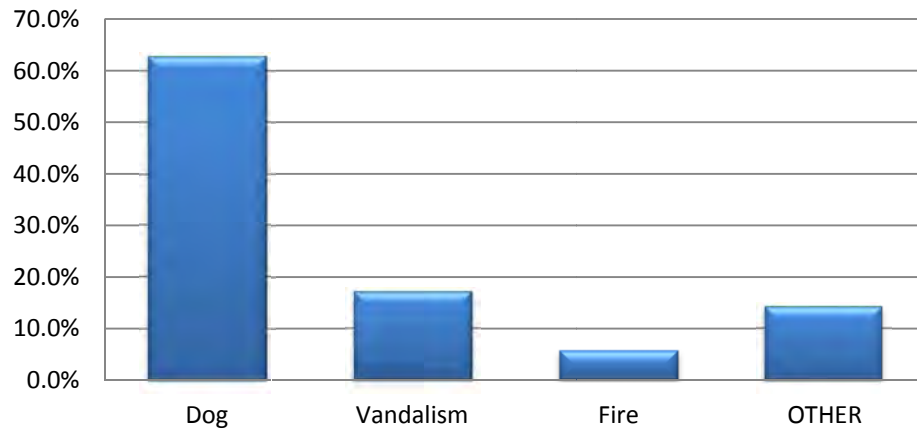
Mori Point Incidents - 2007

24 Total Incidents



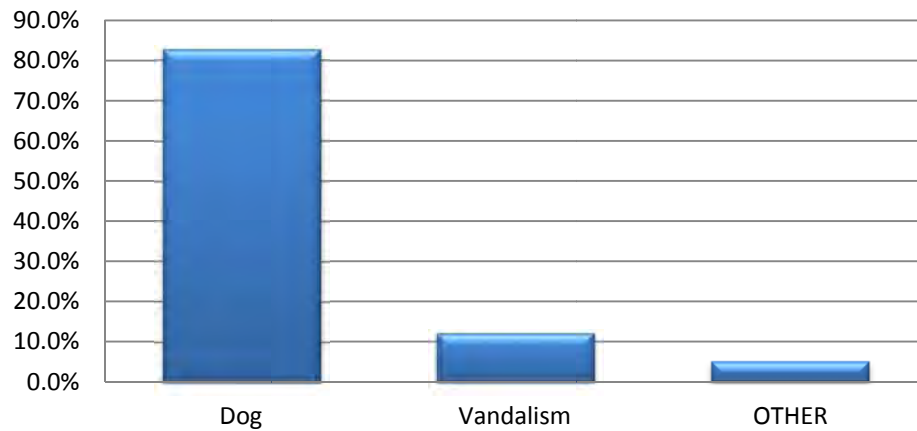
Mori Point Incidents - 2008

35 Total Incidents



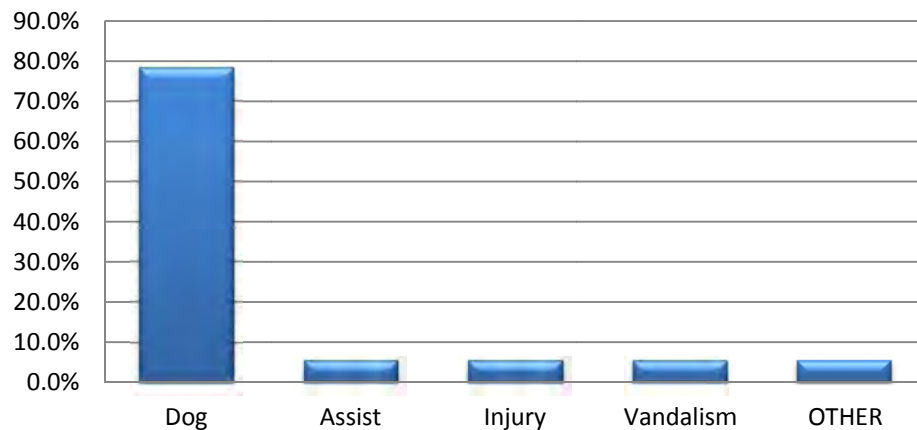
Mori Point Incidents - 2009

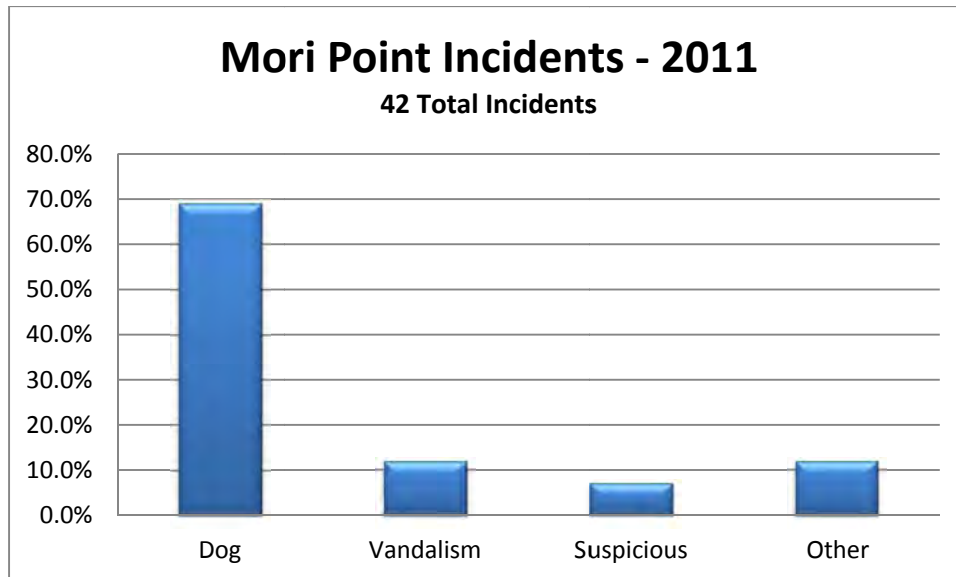
58 Total Incidents



Mori Point Incidents - 2010

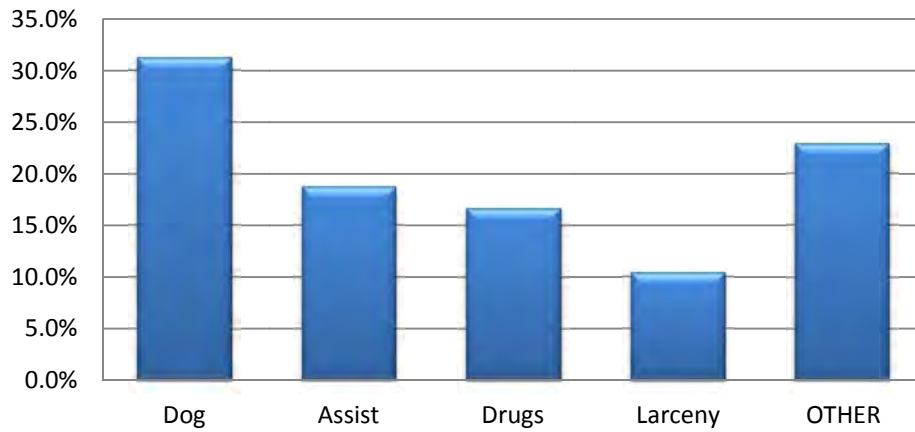
37 Total Incidents





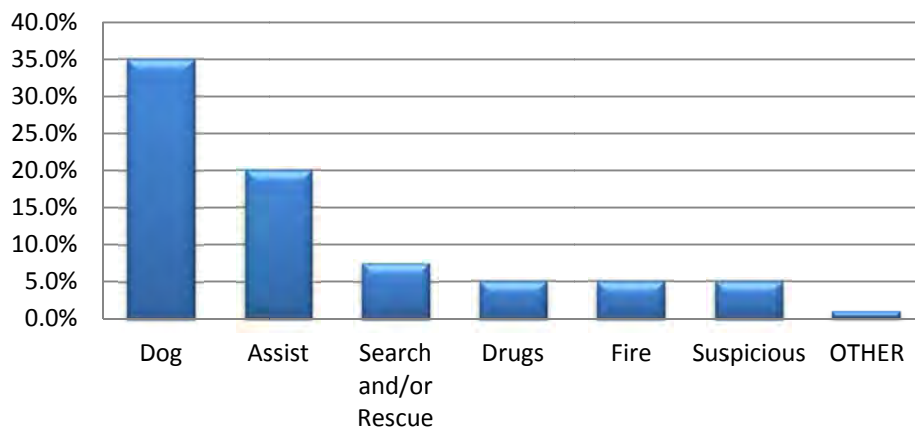
Muir Beach Incidents - 2001

48 Total Incidents



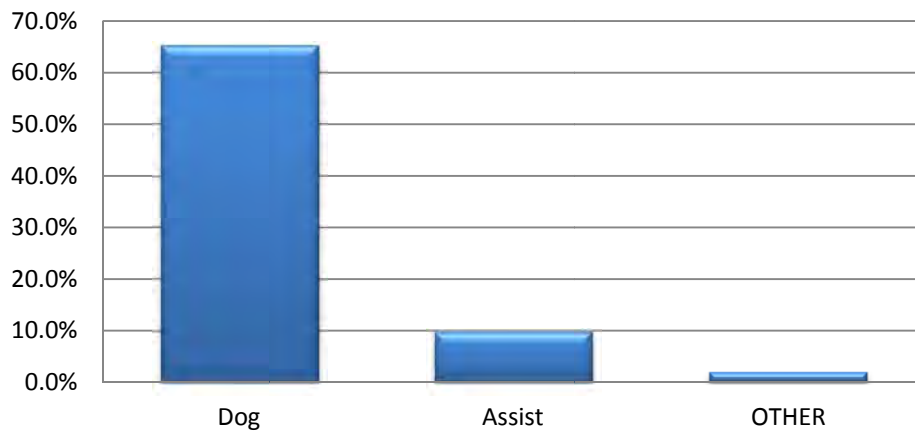
Muir Beach Incidents - 2002

40 Total Incidents



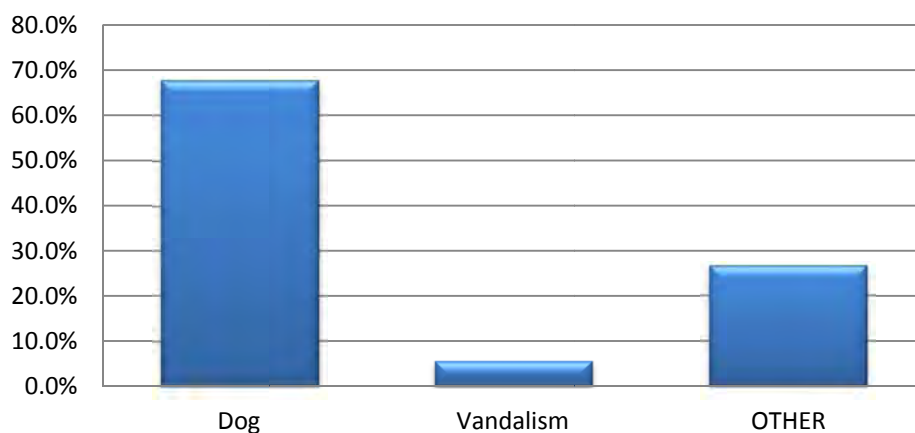
Muir Beach Incidents - 2003

72 Total Incidents



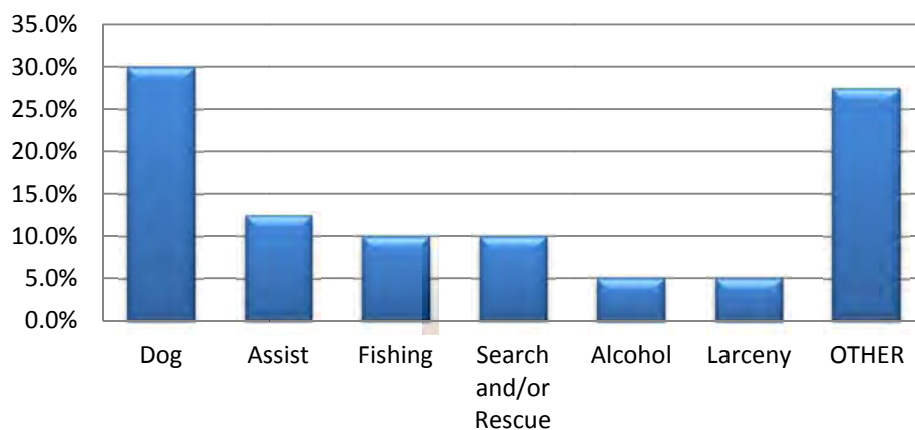
Muir Beach Incidents - 2004

90 Total Incidents



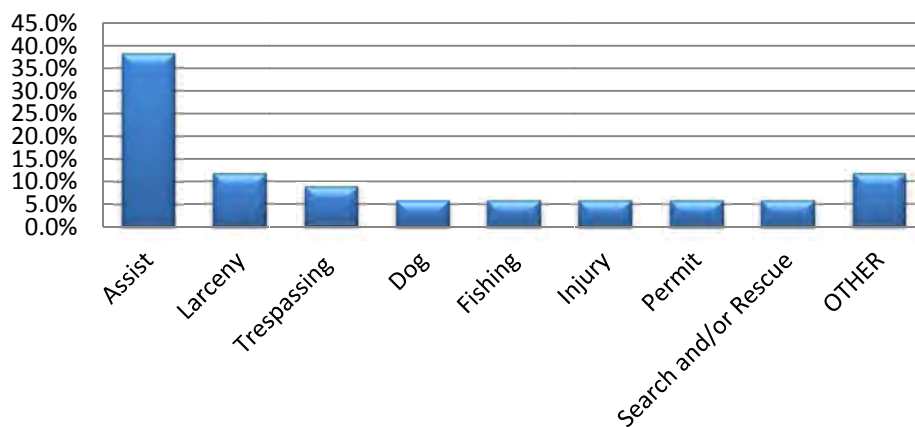
Muir Beach Incidents - 2005

40 Total Incidents



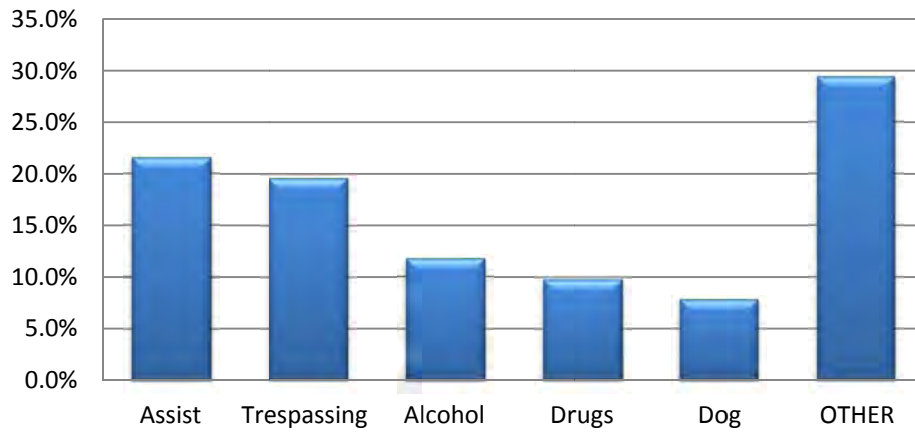
Muir Beach Incidents - 2006

142 Total Incidents



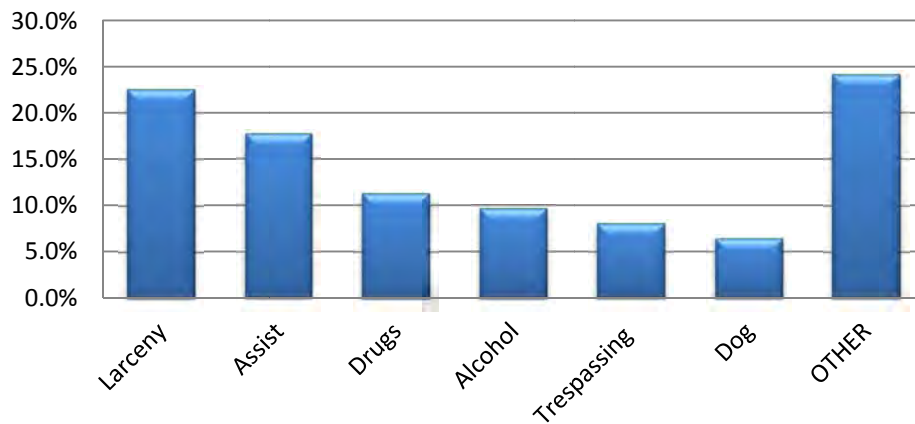
Muir Beach Incidents - 2007

51 Total Incidents



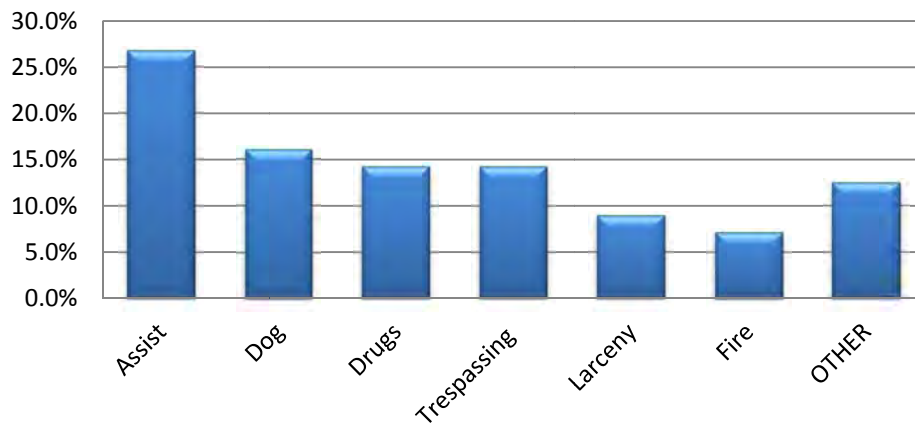
Muir Beach Incidents - 2008

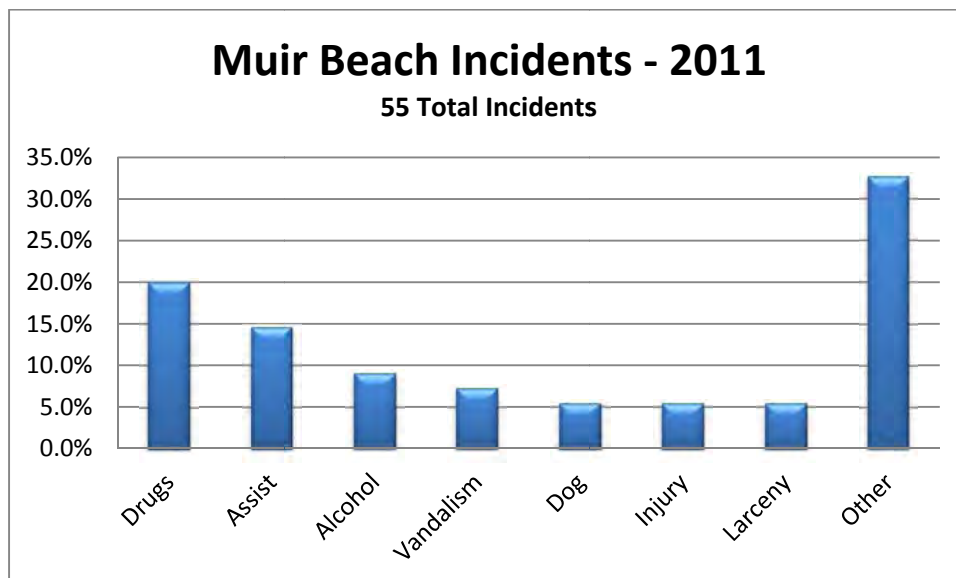
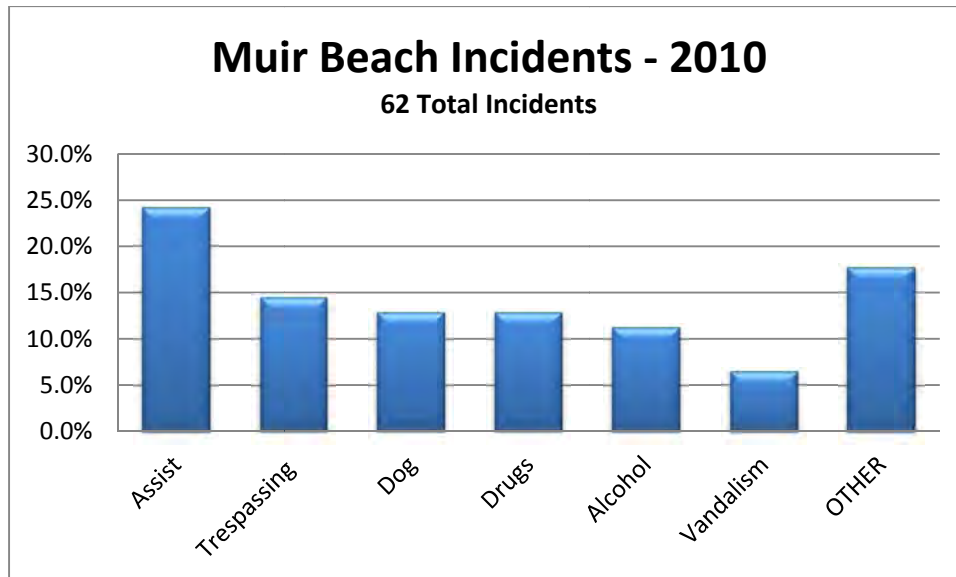
62 Total Incidents



Muir Beach Incidents - 2009

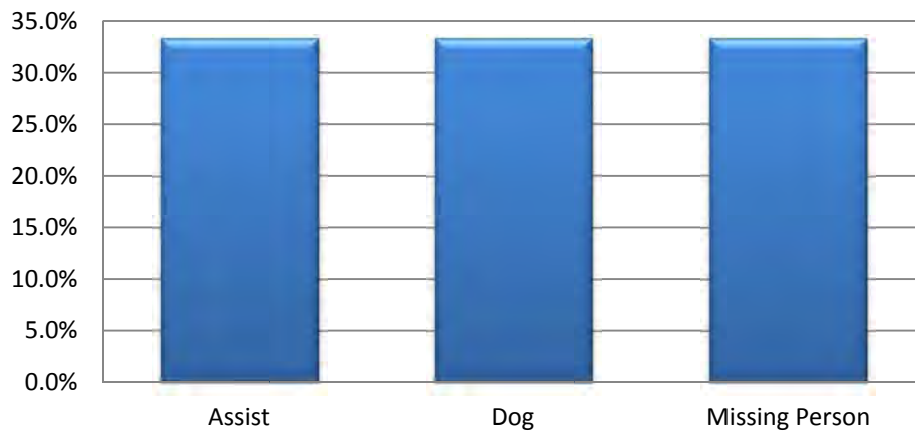
56 Total Incidents





Oakwood Valley Incidents - 2001

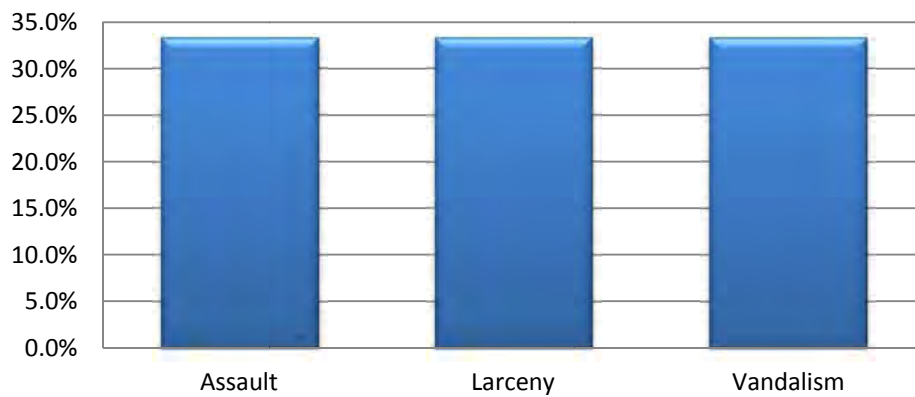
3 Total Incidents



Oakwood Valley Incidents - 2002

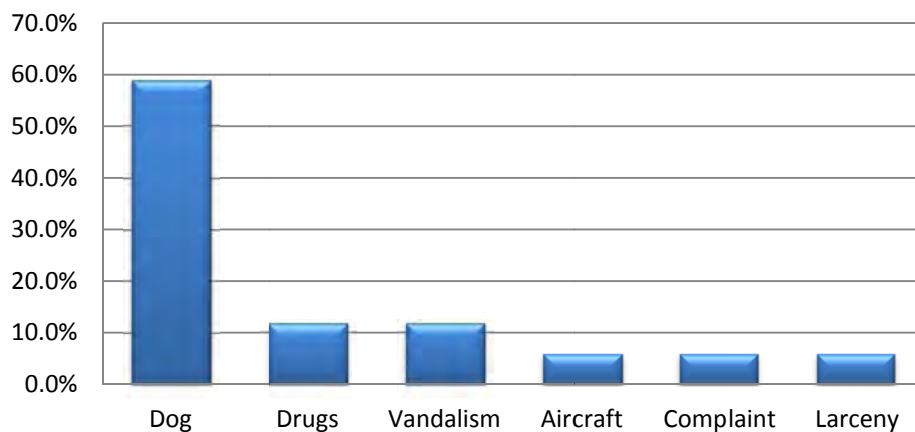
3 Total Incidents

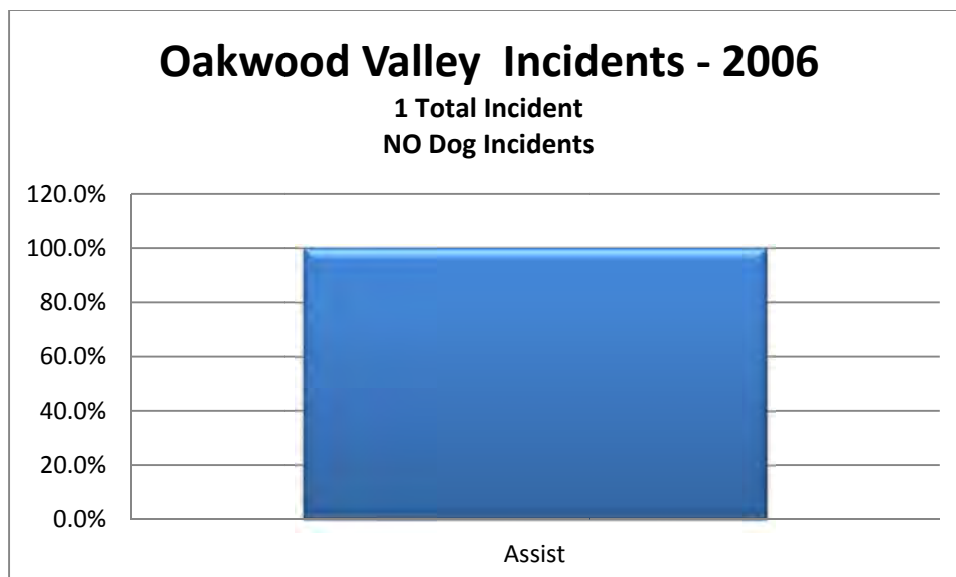
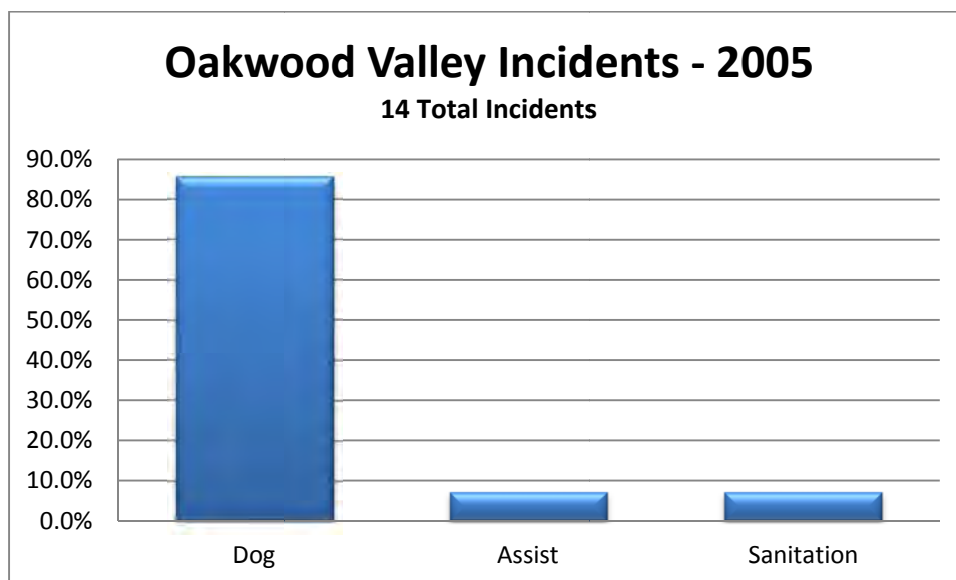
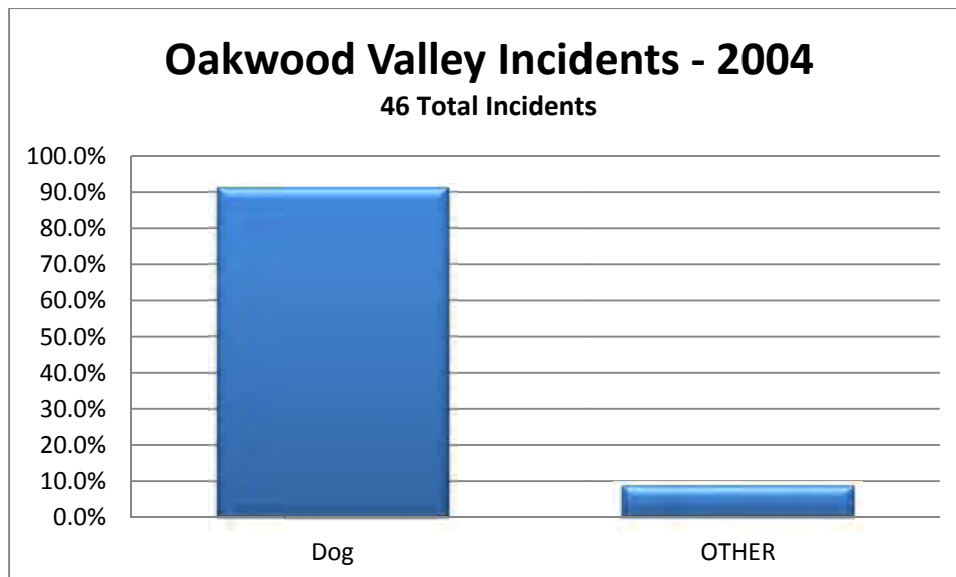
NO Dog Incidents



Oakwood Valley Incidents - 2003

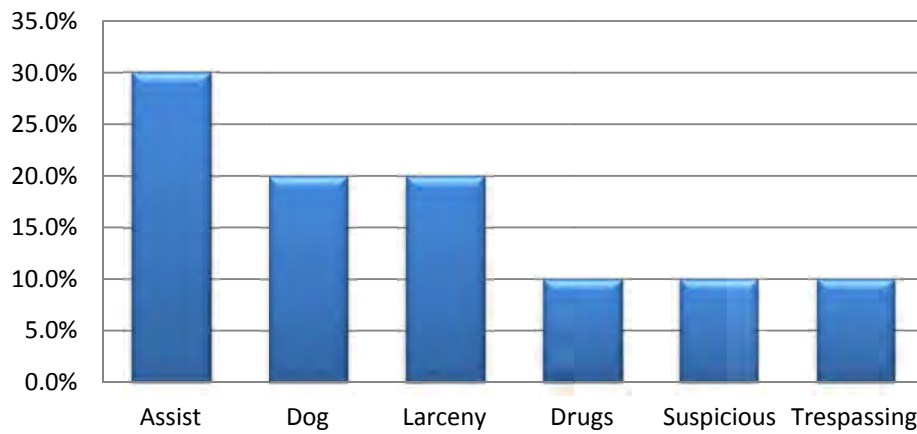
17 Total Incidents





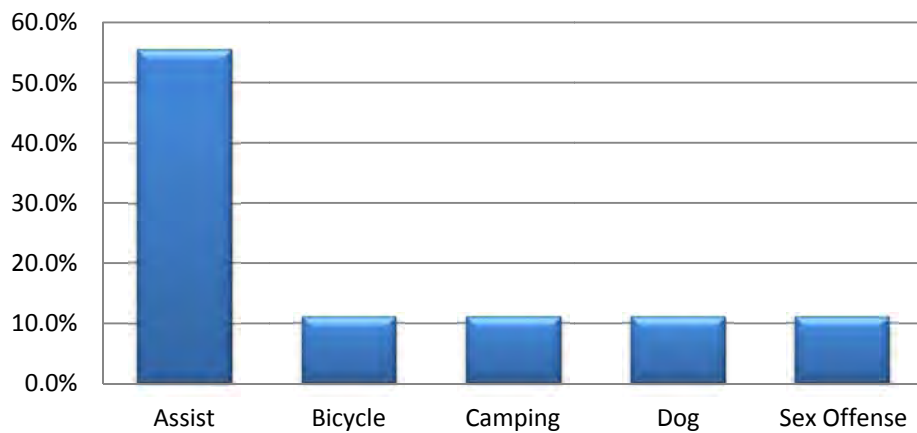
Oakwood Valley Incidents - 2007

10 Total Incidents



Oakwood Valley Incidents - 2008

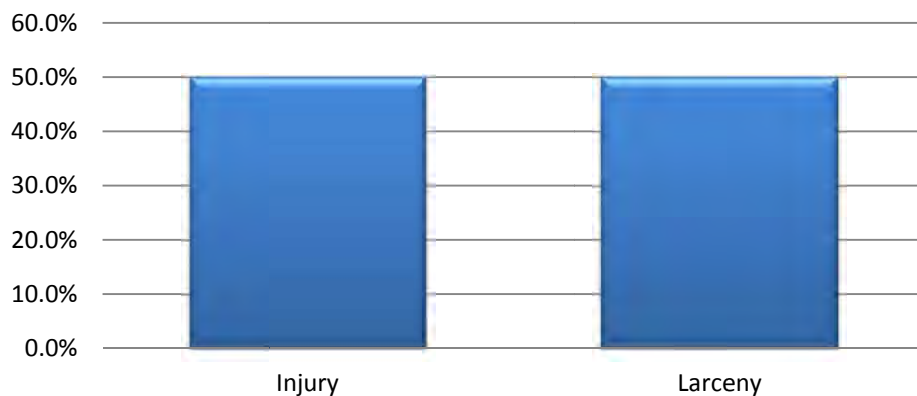
9 Total Incidents



Oakwood Valley Incidents - 2009

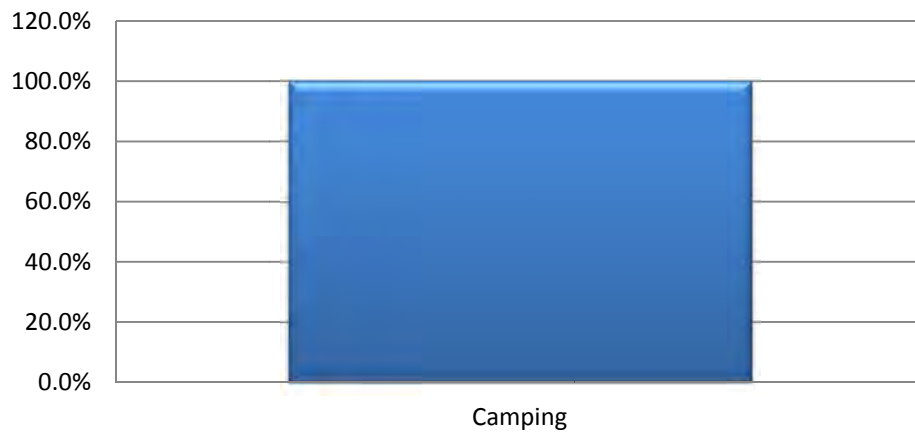
2 Total Incidents

NO Dog Incidents



Oakwood Valley Incidents - 2010

1 Total Incident



Oakwood Valley Incidents - 2011

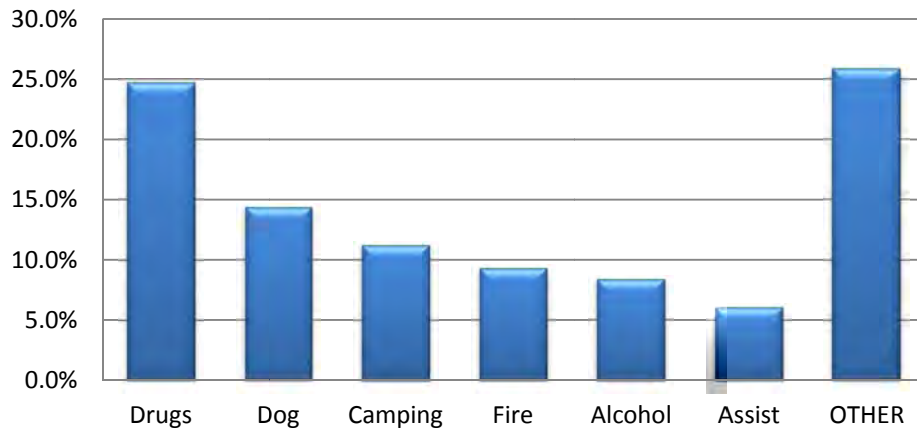
1 Total Incident

NO Dog Incidents



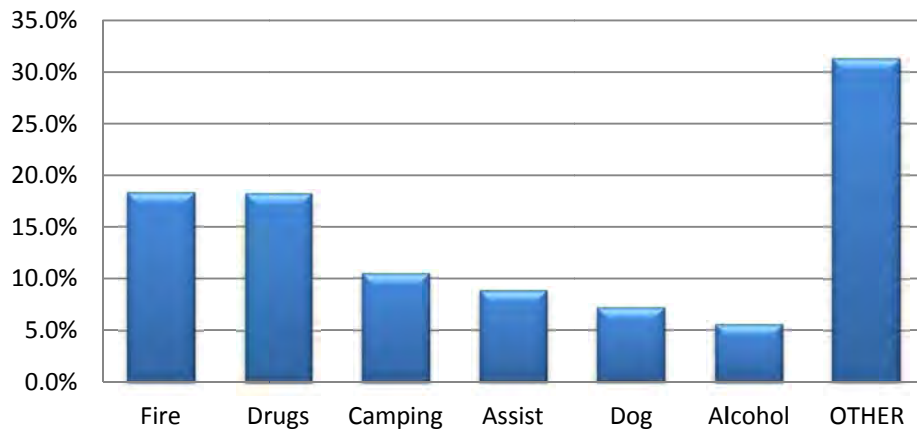
Ocean Beach Incidents - 2001

954 Total Incidents



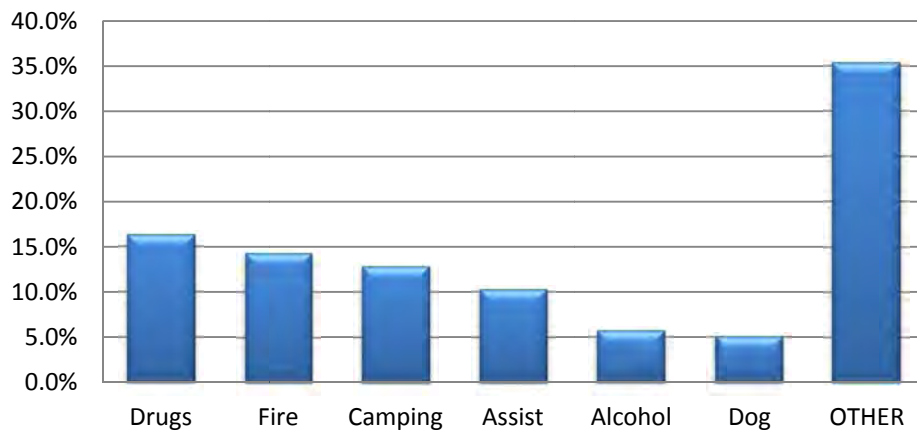
Ocean Beach Incidents - 2002

916 Total Incidents



Ocean Beach Incidents - 2003

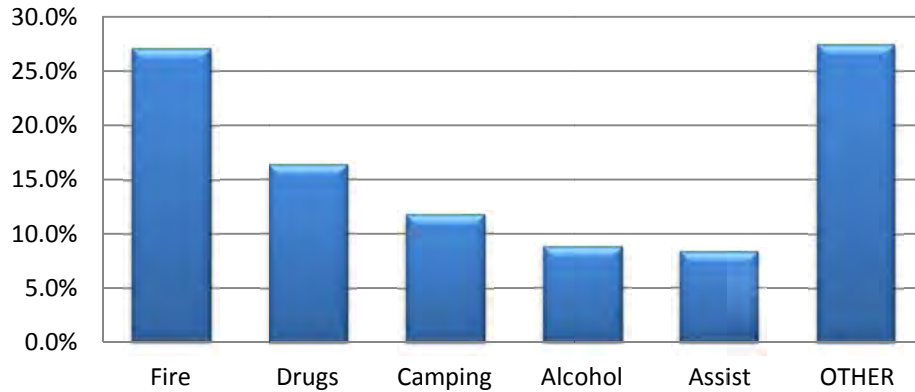
943 Total Incidents



Ocean Beach Incidents - 2004

1280 Total Incidents

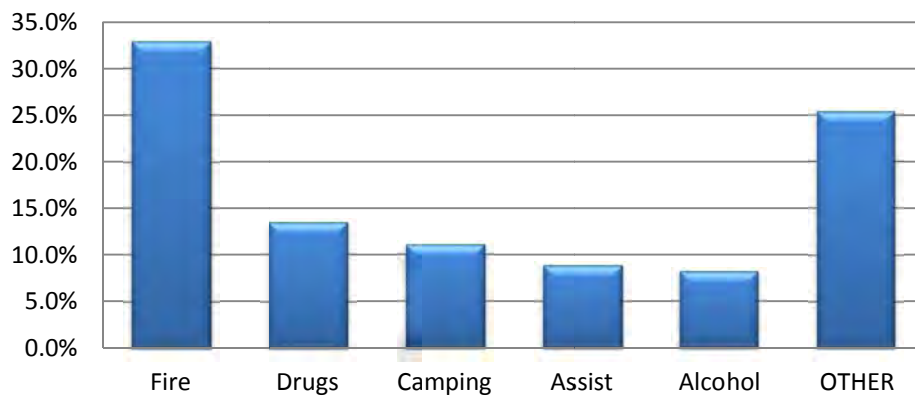
Dog Incidents Included in "Other" = 4.5%



Ocean Beach Incidents - 2005

1424 Total Incidents

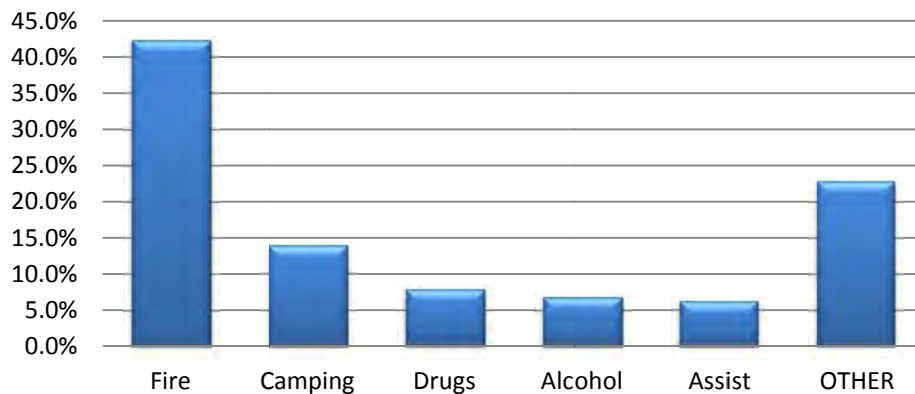
Dog Incidents Included in "Other" = 2.8%



Ocean Beach Incidents - 2006

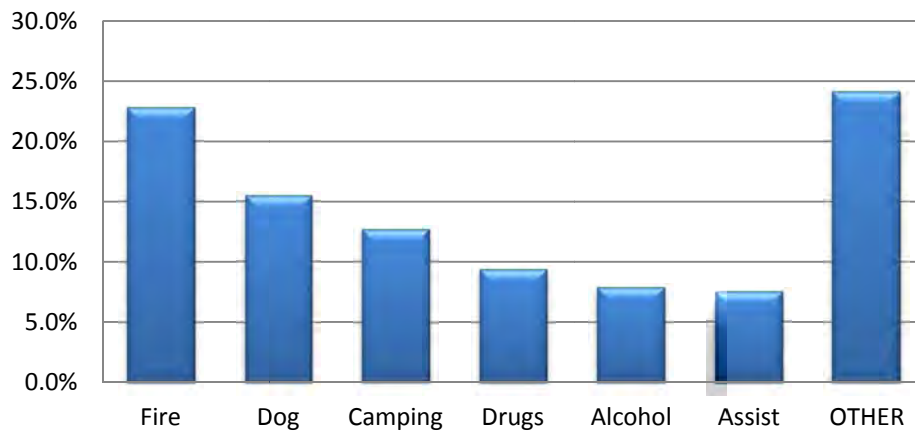
1273 total incidents

Dog Incidents Included in "Other" = 2.0%



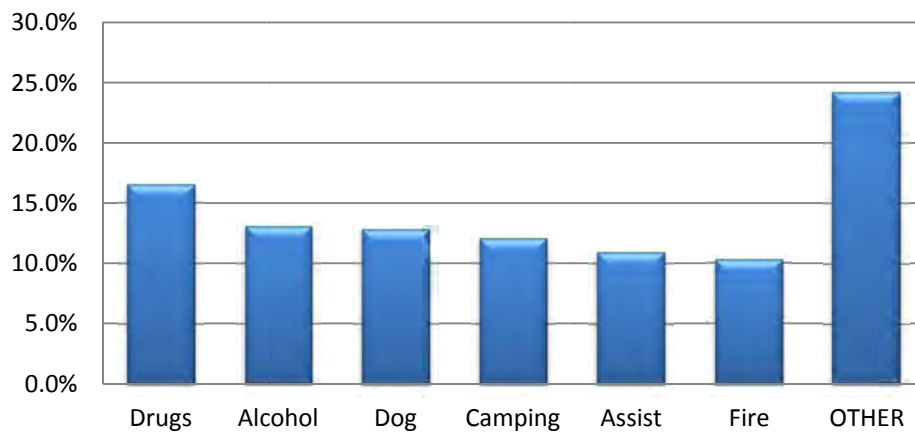
Ocean Beach Incidents - 2007

1329 Total Incidents



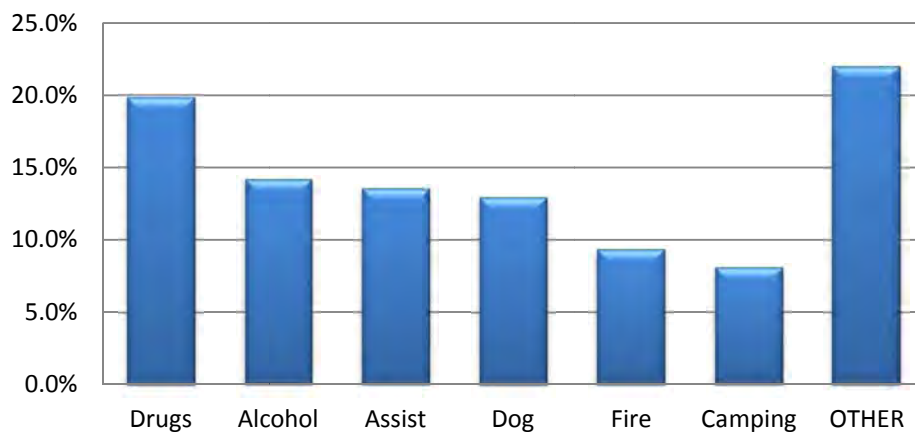
Ocean Beach Incidents - 2008

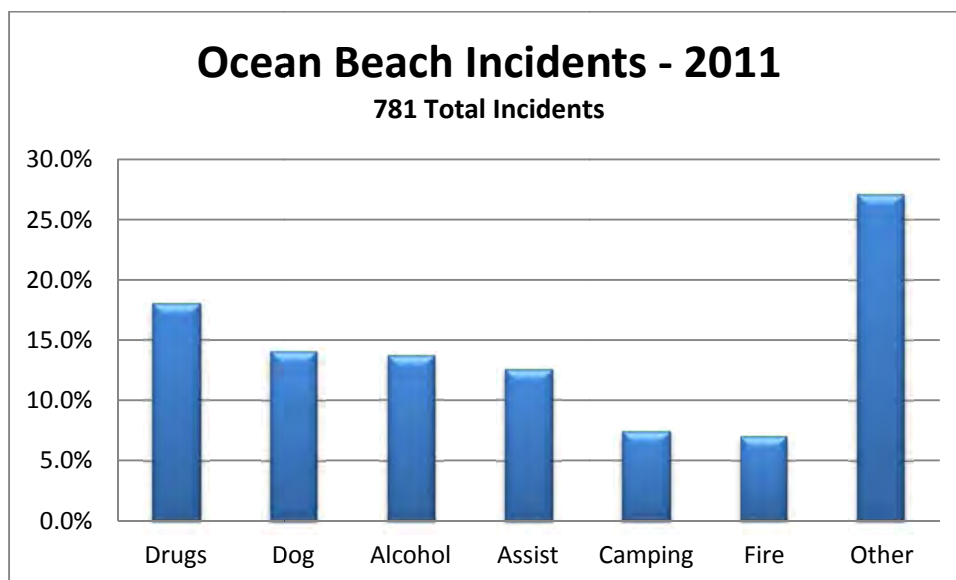
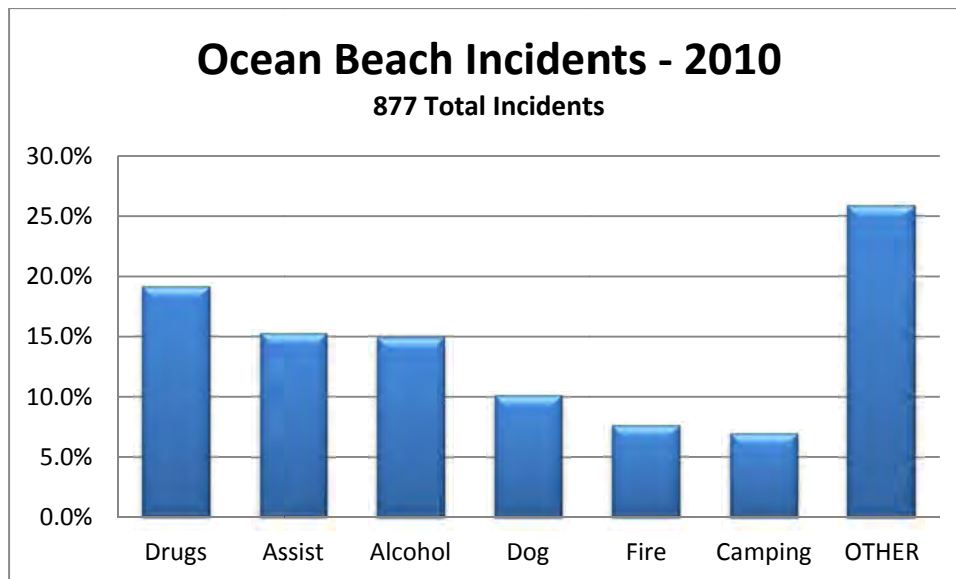
1077 Total Incidents



Ocean Beach Incidents - 2009

1113 Total Incidents

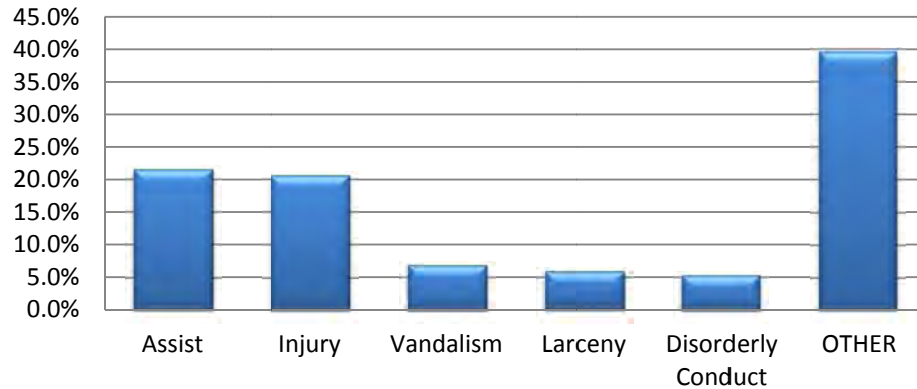




Other Area Incidents - 2001

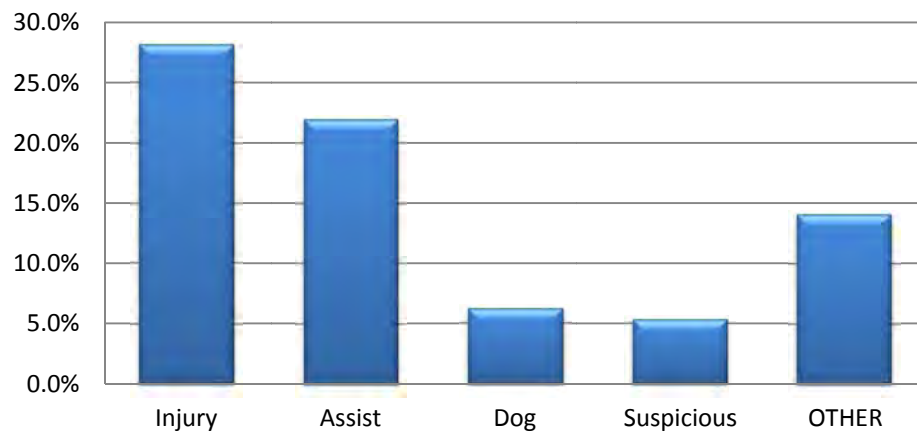
320 Total Incidents

Dog Incidents Included in "Other" = 4.7%



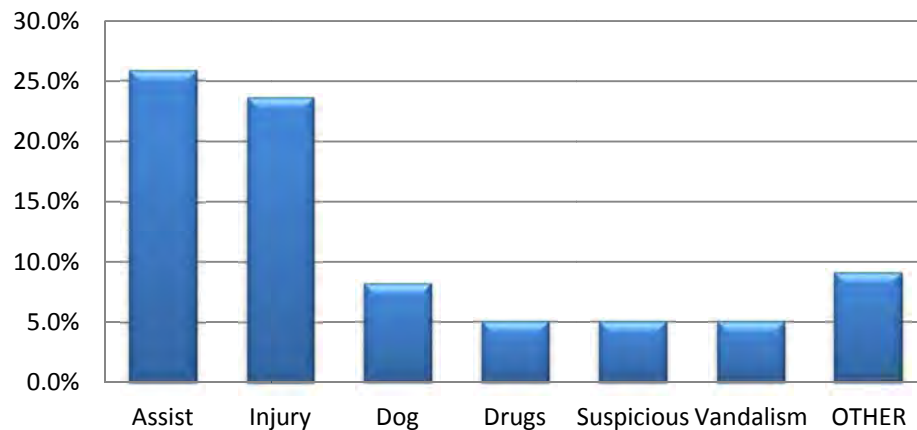
Other Area Incidents - 2002

337 Total Incidents



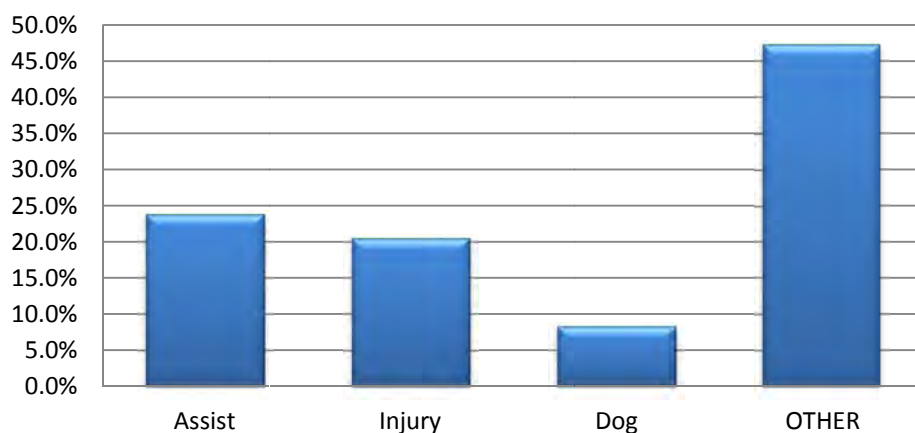
Other Area Incidents - 2003

317 Total Incidents



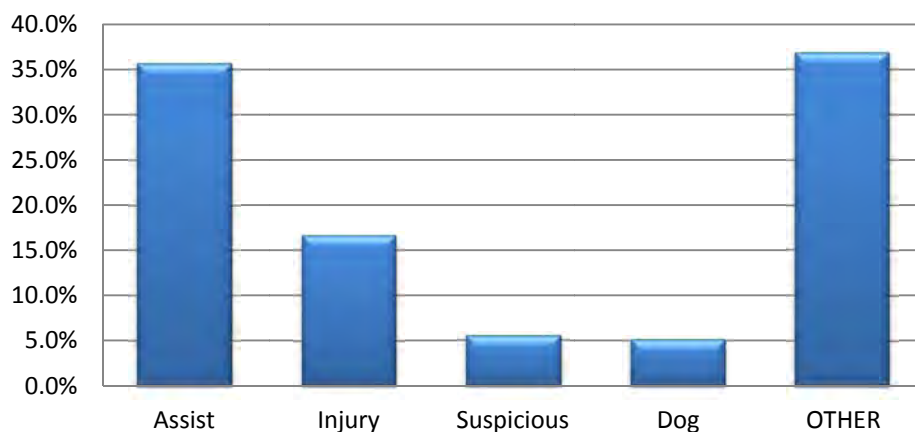
Other Area Incidents - 2004

336 Total Incidents



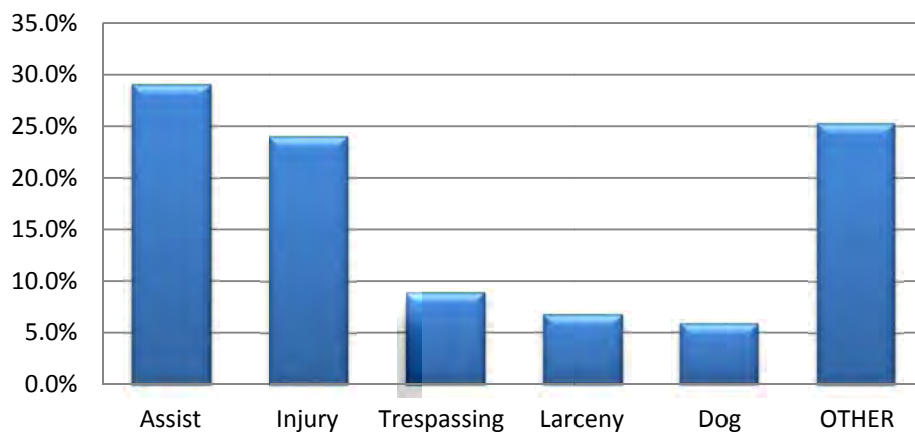
Other Area Incidents - 2005

252 Total Incidents



Other Area Incidents - 2006

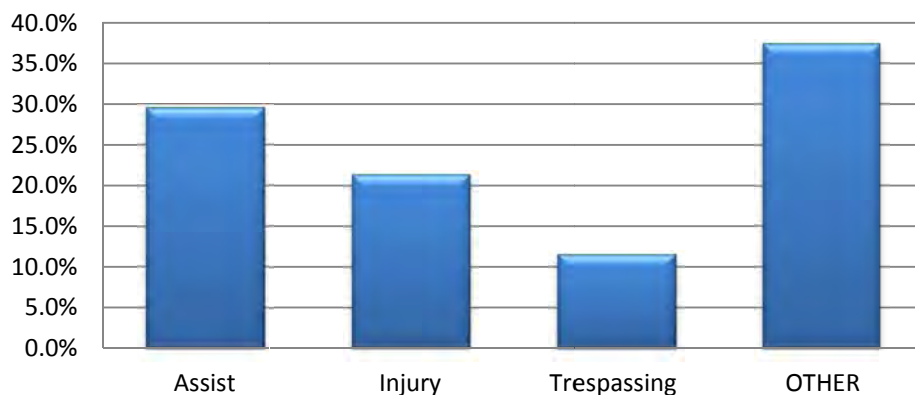
237 Total Incidents



Other Area Incidents - 2007

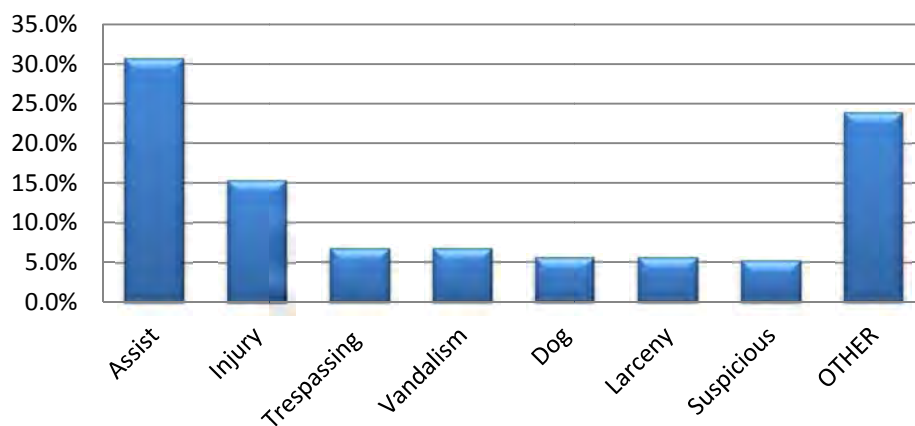
355 Total Incidents

Dog Incidents Included in "Other" = 4.5%



Other Area Incidents - 2008

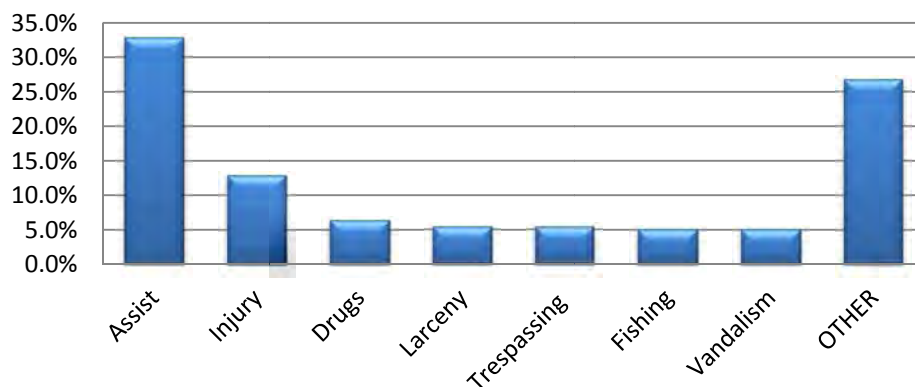
267 Total Incidents



Other Area Incidents - 2009

295 Total Incidents

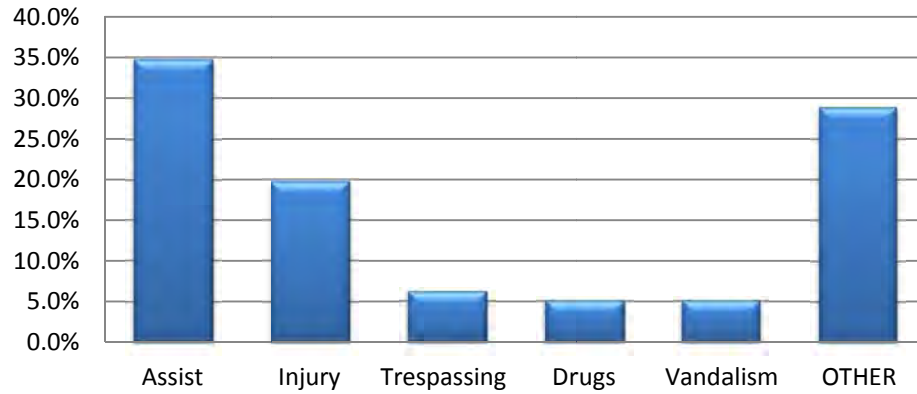
Dog Incidents Included in "Other" = 4.4%



Other Area Incidents - 2010

273 Total Incidents

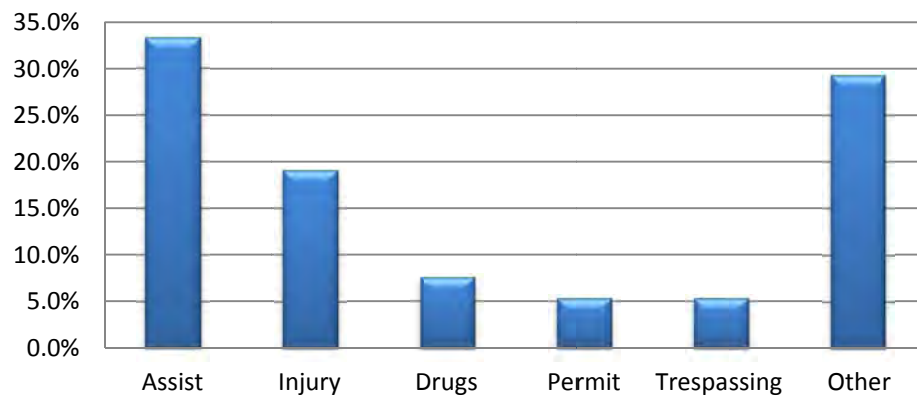
Dog Incidents Included in "Other" = 4.0%



Other Area Incidents - 2011

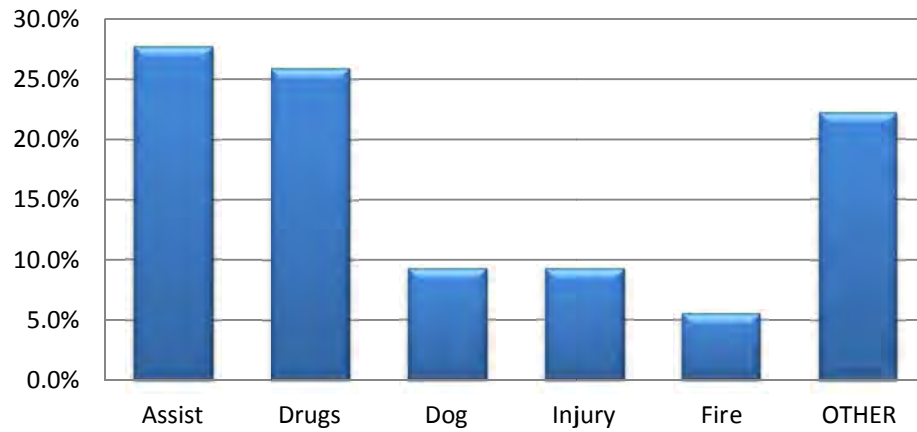
225 Total Incidents

Dog Incidents Included in "Other" = 3.6%



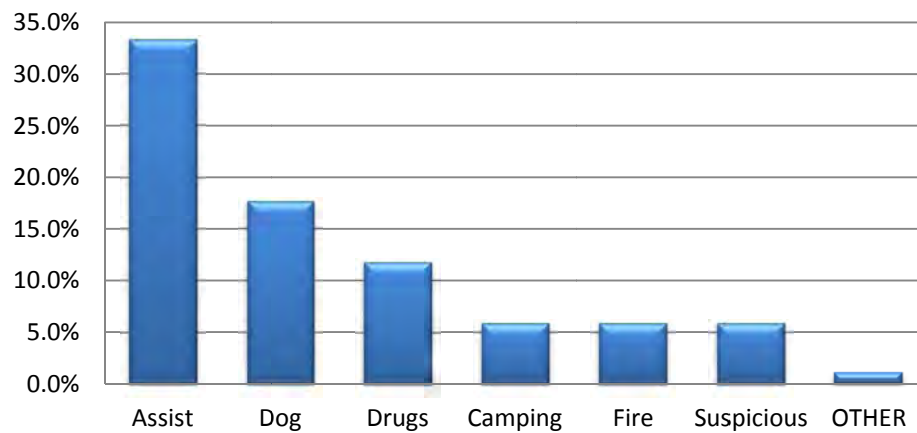
Rodeo Beach Incidents - 2001

54 Total Incidents



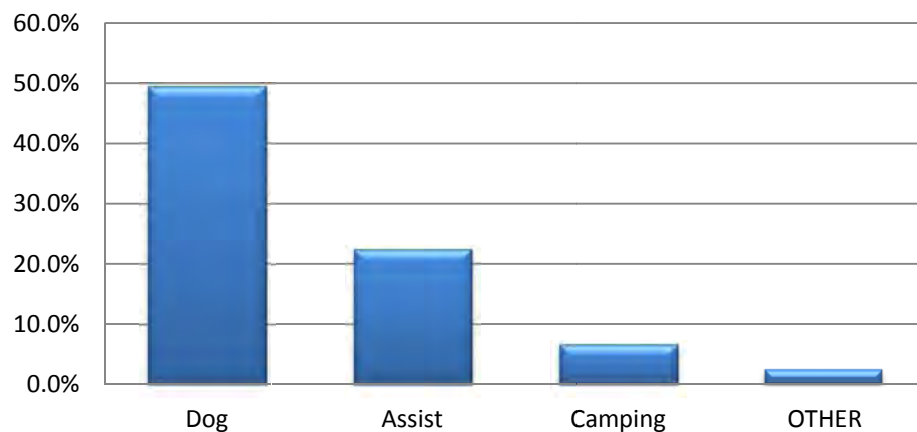
Rodeo Beach Incidents - 2002

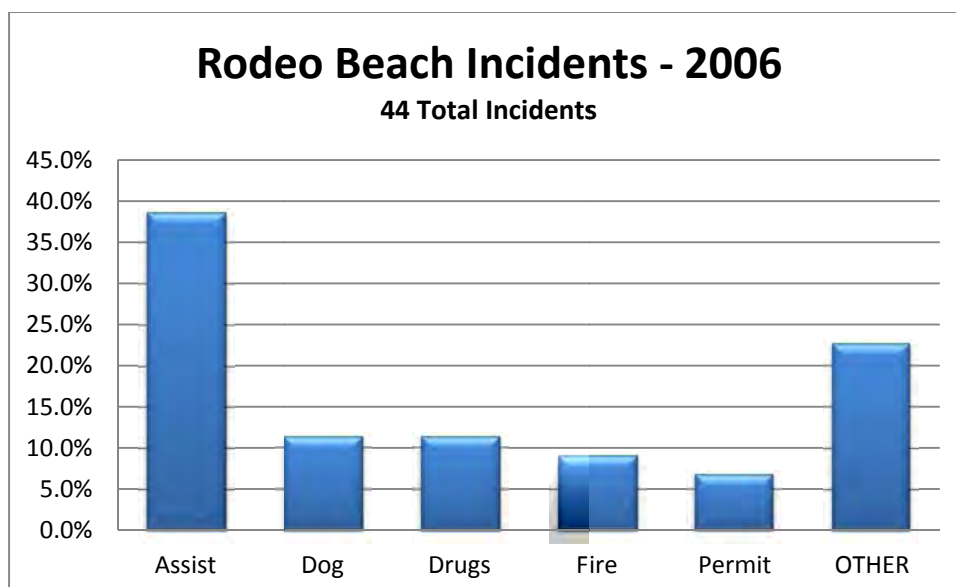
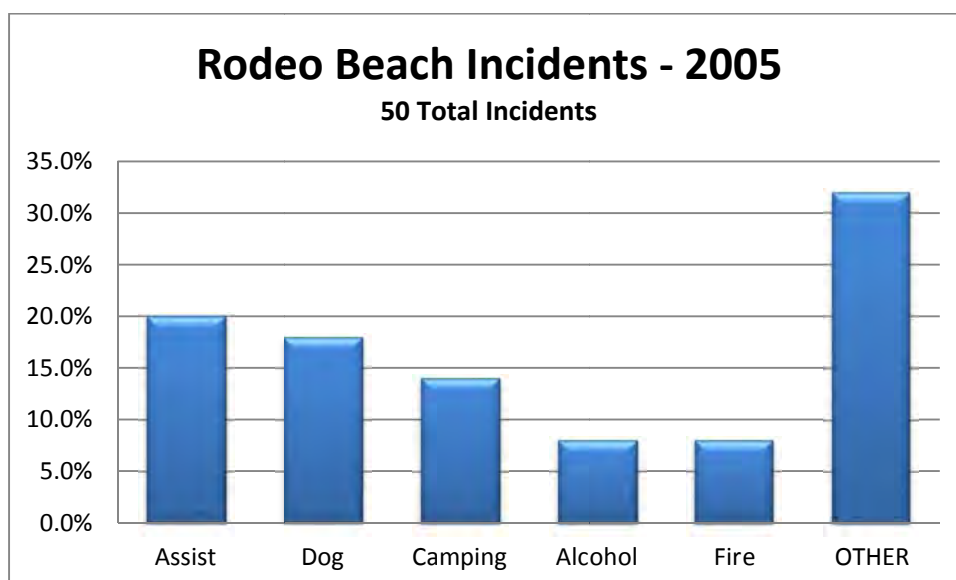
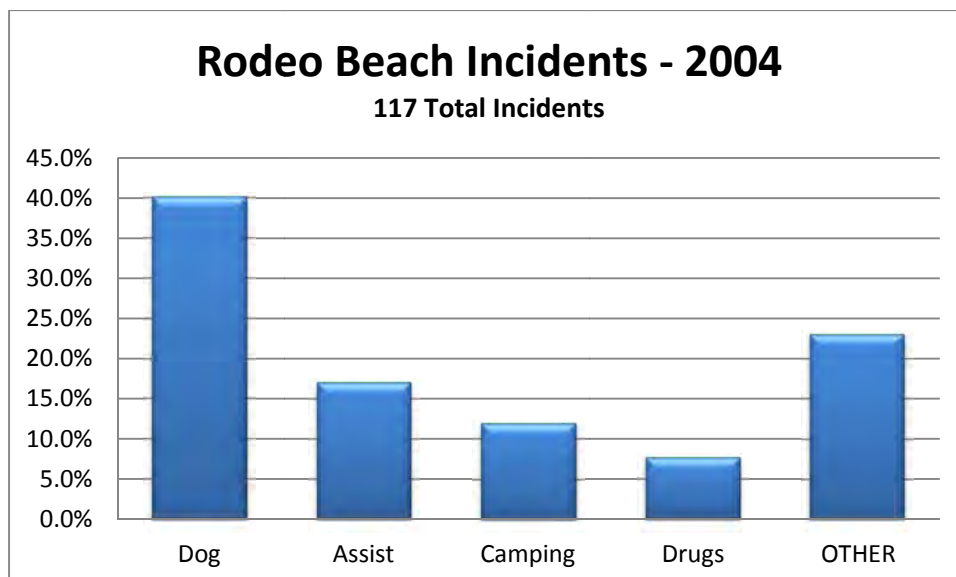
51 Total Incidents



Rodeo Beach Incidents - 2003

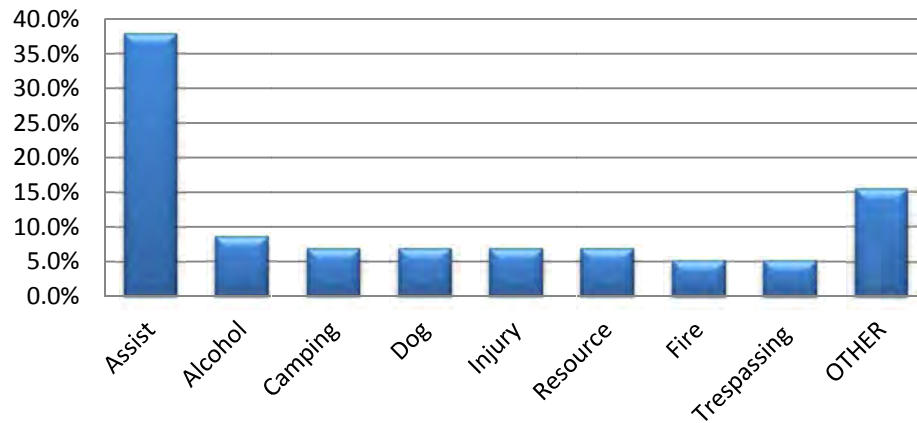
107 Total Incidents





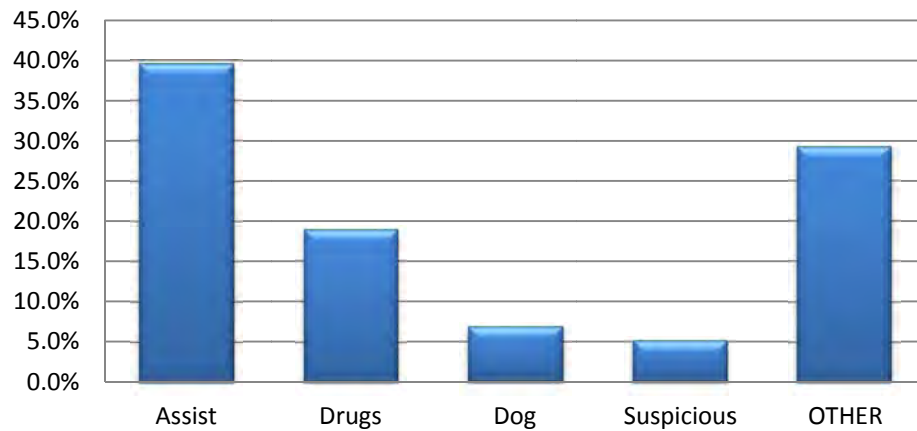
Rodeo Beach Incidents - 2007

58 Total Incidents



Rodeo Beach Incidents - 2008

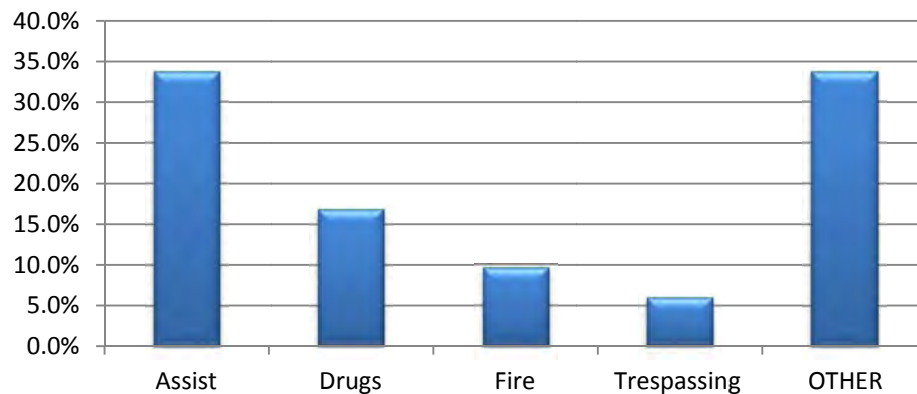
58 Total Incidents

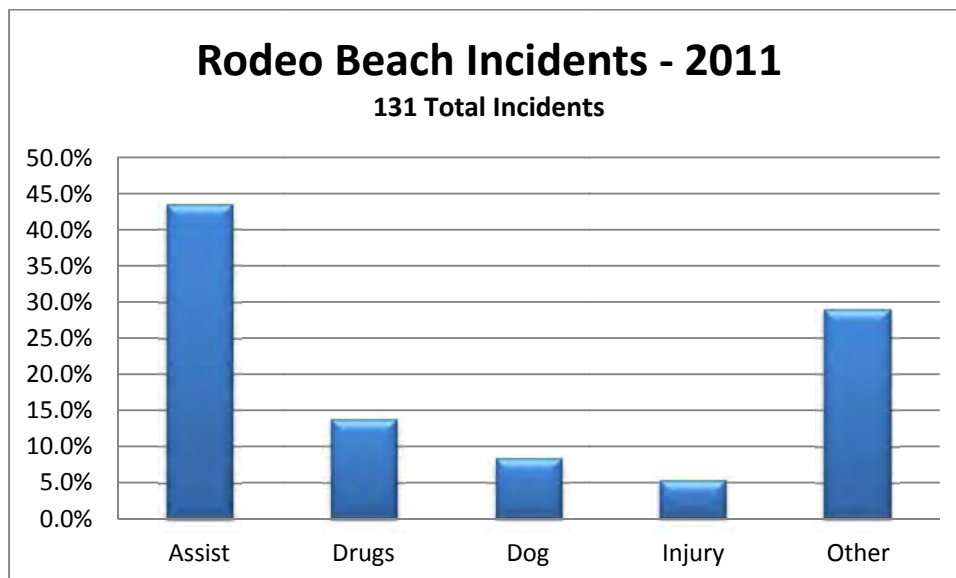
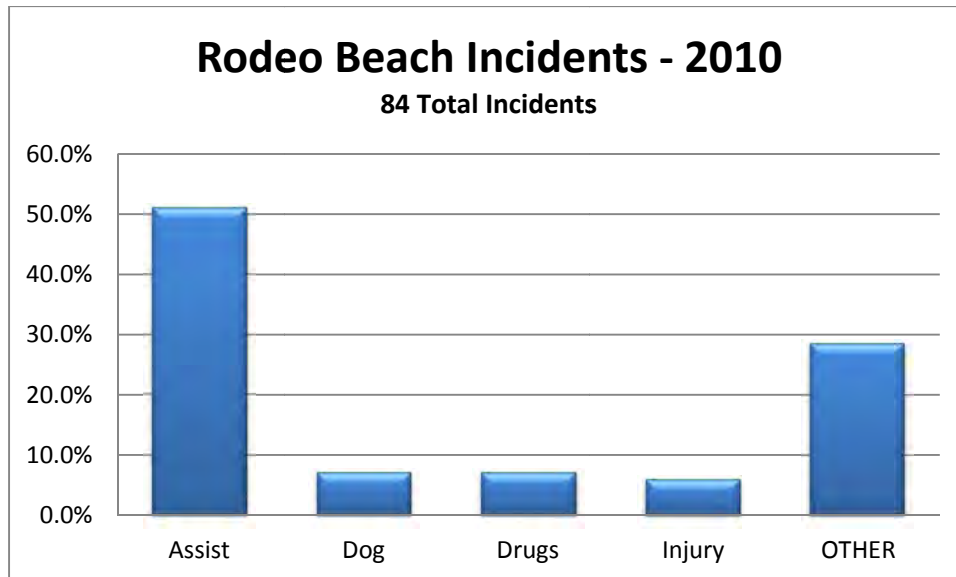


Rodeo Beach Incidents - 2009

83 Total Incidents

Dog Incidents Included in "Other" = 4.8%

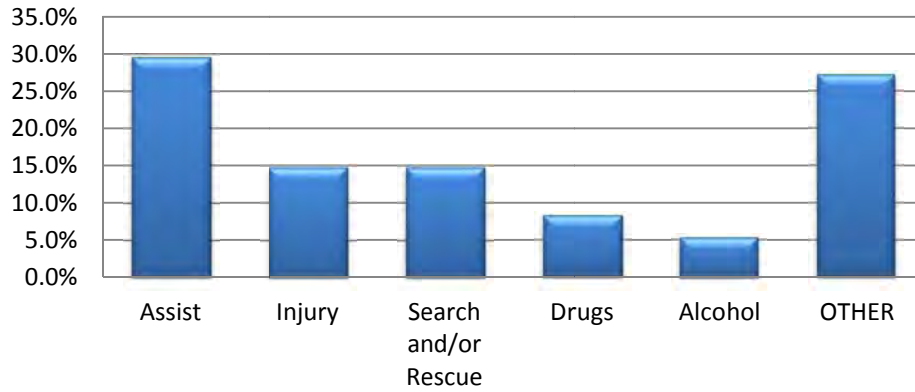




Stinson Beach Incidents - 2001

169 Total Incidents

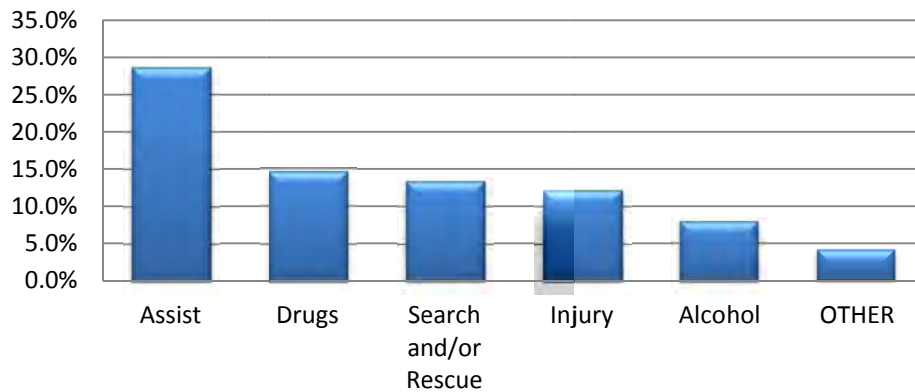
Dog Incidents Included in "Other" = 1.8%



Stinson Beach Incidents - 2002

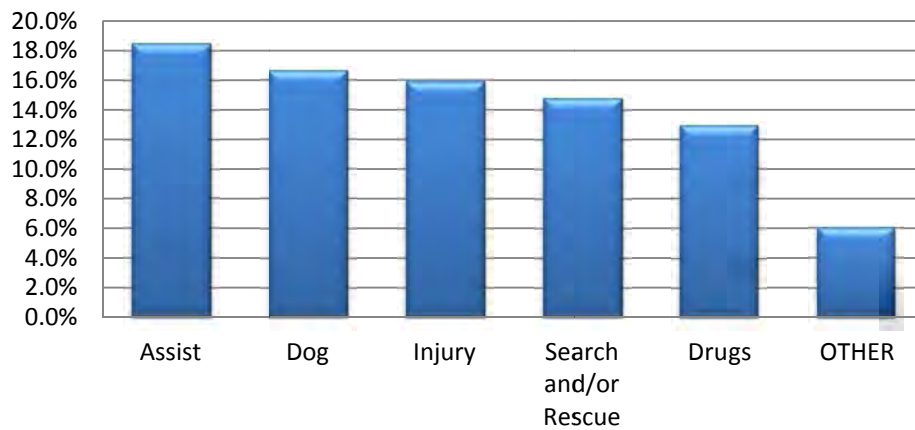
164 Total Incidents

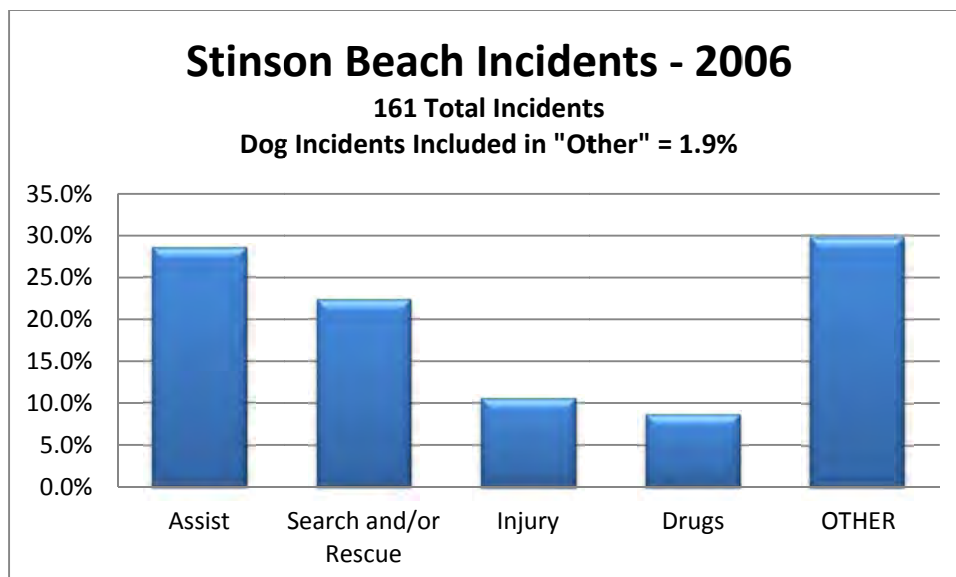
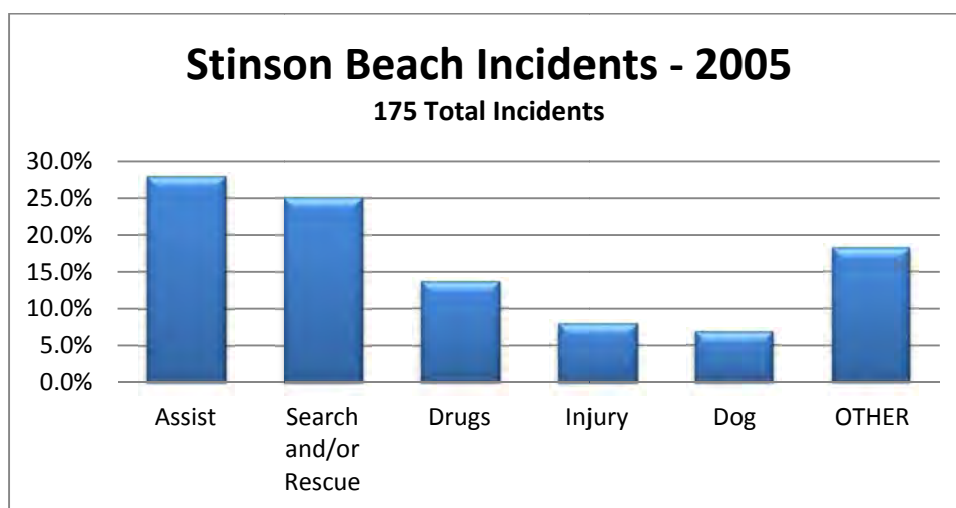
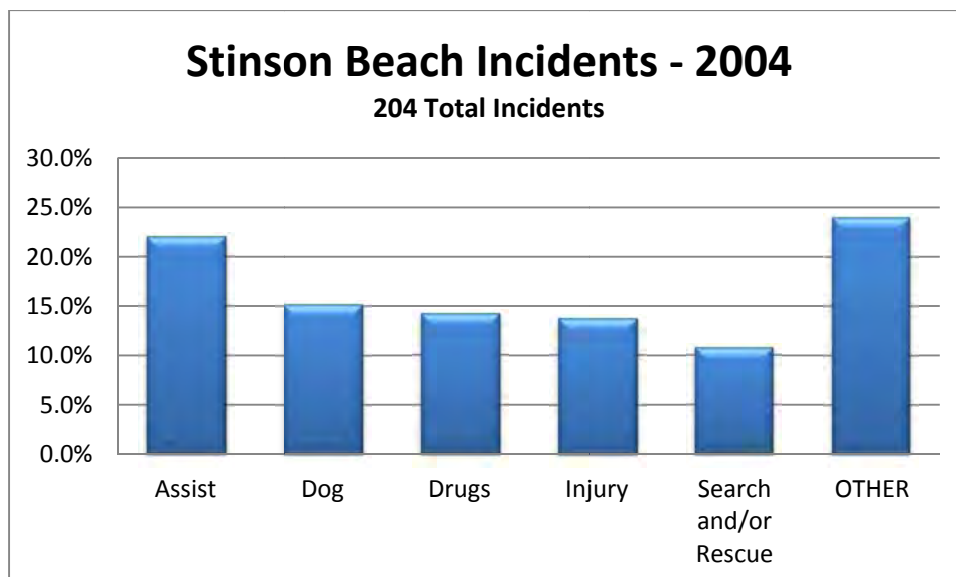
Dog Incidents Included in "Other" = 4.9%



Stinson Beach Incidents - 2003

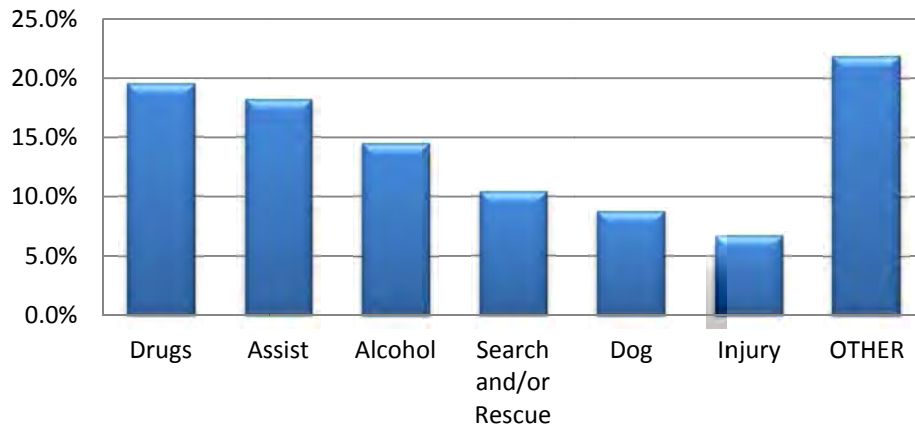
270 Total Incidents





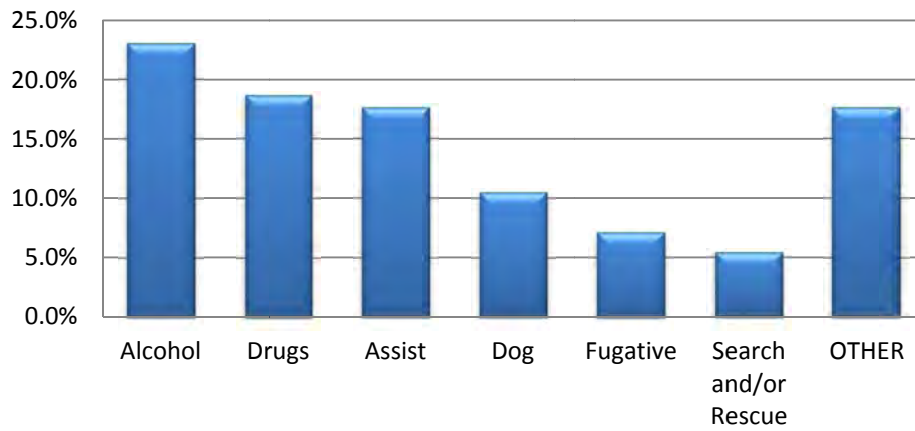
Stinson Beach Incidents - 2007

297 Total Incidents



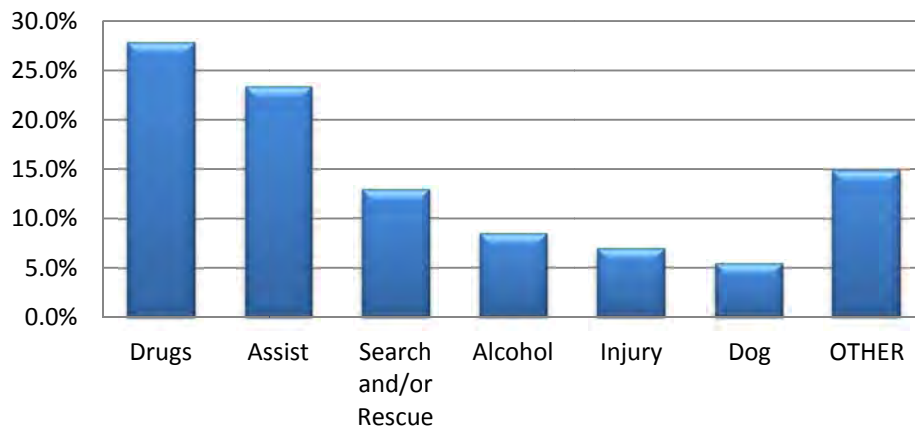
Stinson Beach Incidents - 2008

295 Total Incidents



Stinson Beach Incidents - 2009

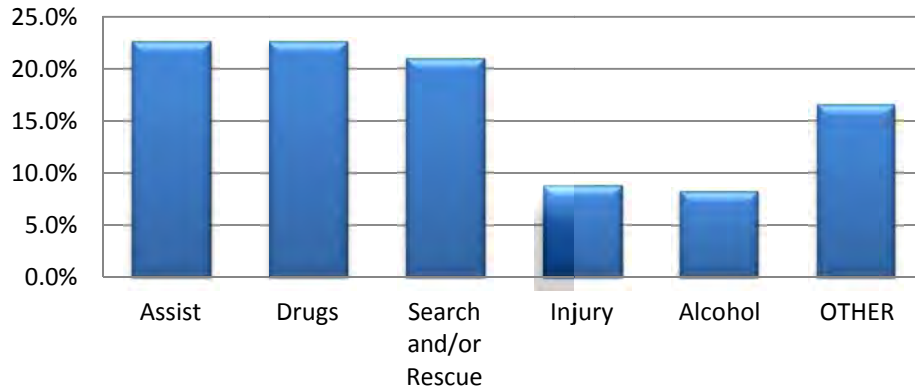
201 Total Incidents



Stinson Beach Incidents - 2010

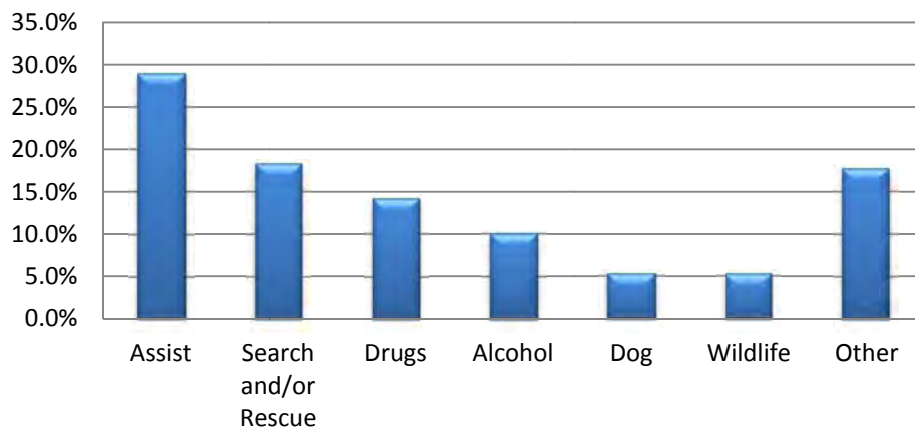
181 Total Incidents

Dog Incidents Included in "Other" = 3.3%



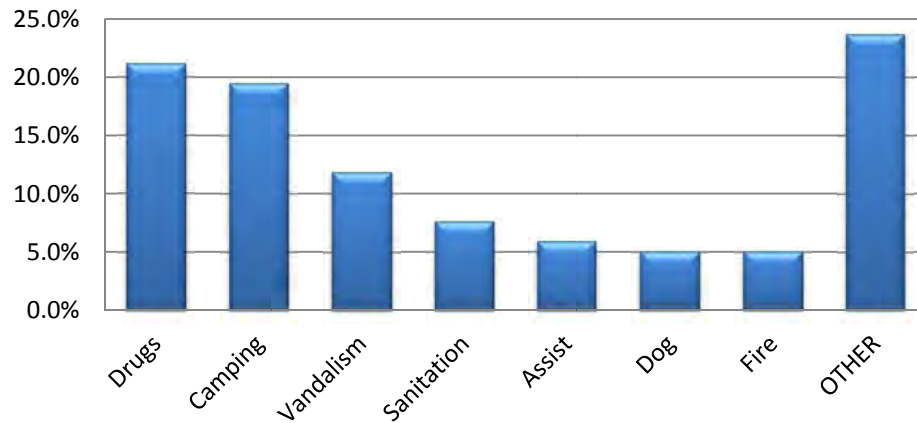
Stinson Beach Incidents - 2011

169 Total Incidents



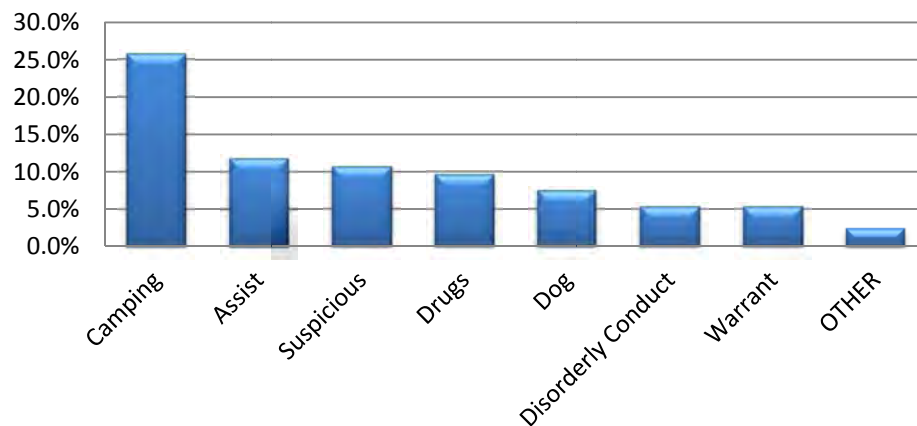
Sutro Heights Incidents - 2001

118 Total Incidents



Sutro Heights Incidents - 2002

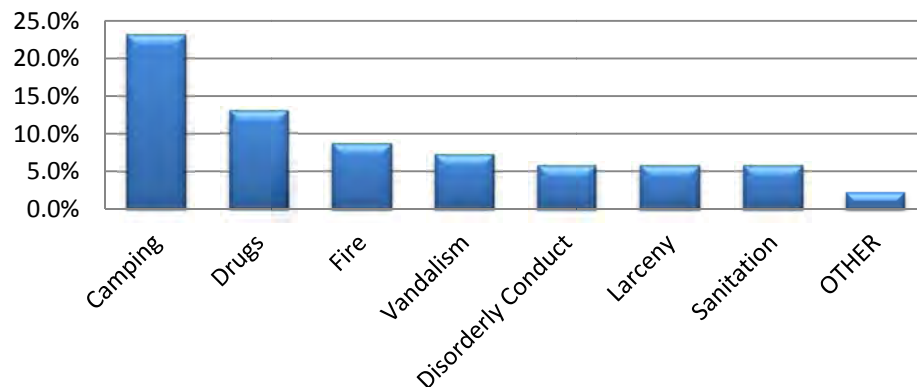
93 Total Incidents



Sutro Heights Incidents - 2003

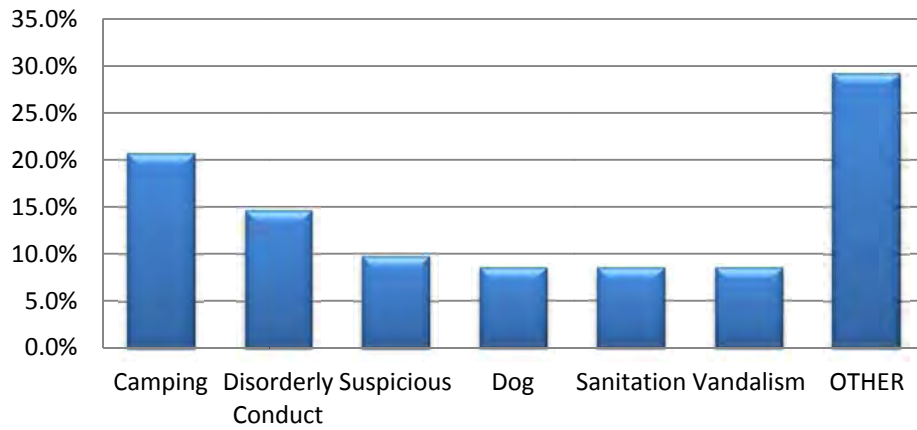
69 Total Incidents

Dog Incidents Included in "Other" = 4.3%



Sutro Heights Incidents - 2004

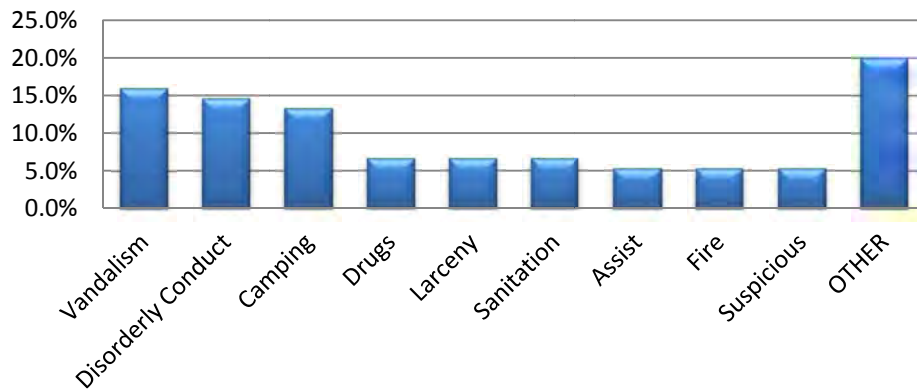
82 Total Incidents



Sutro Heights Incidents - 2005

75 Total Incidents

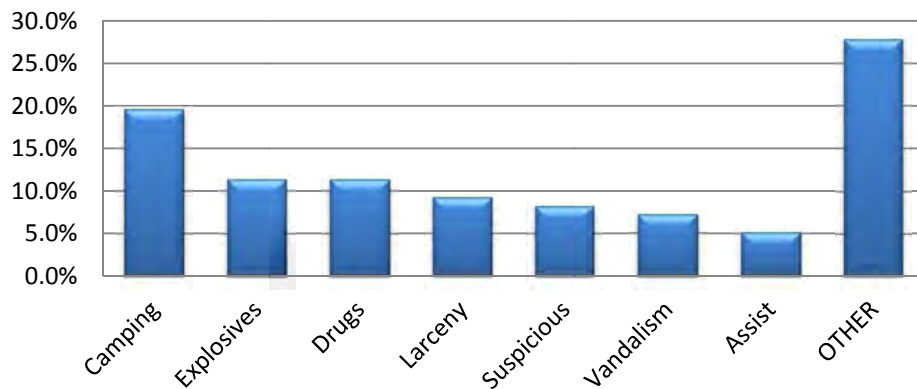
Dog Incidents Included in "Other" = 1.3%



Sutro Heights Incidents - 2006

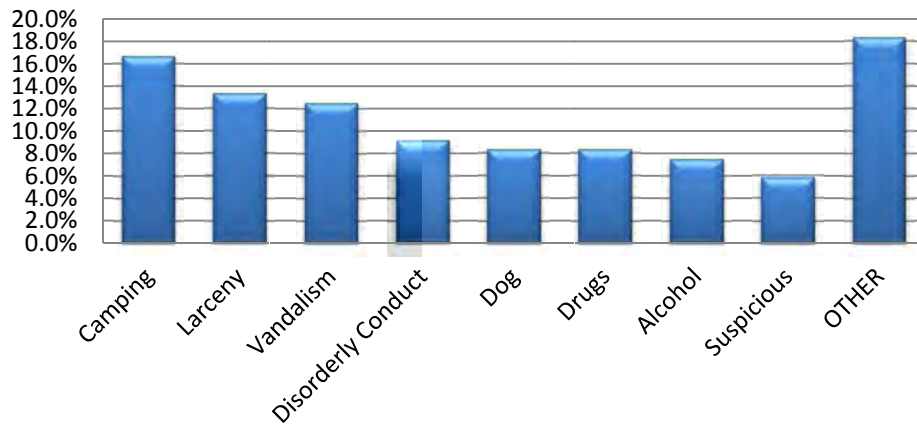
97 Total Incidents

Dog Incidents Included in "Other" = 4.1%



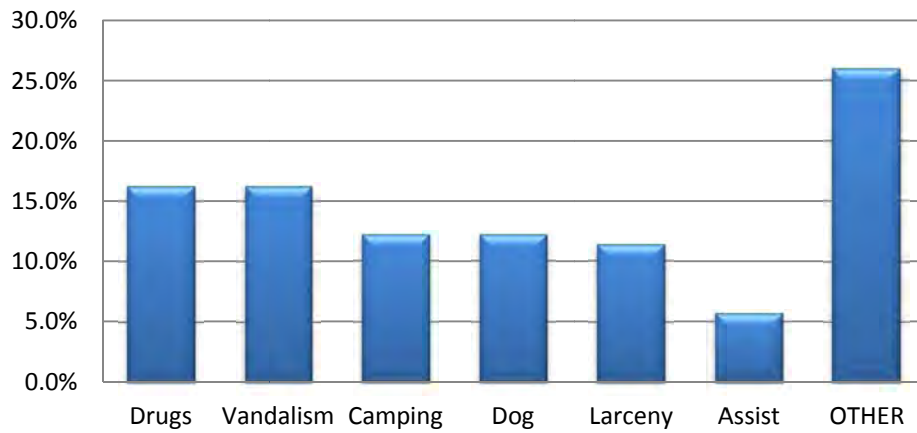
Sutro Heights Incidents - 2007

120 Total Incidents



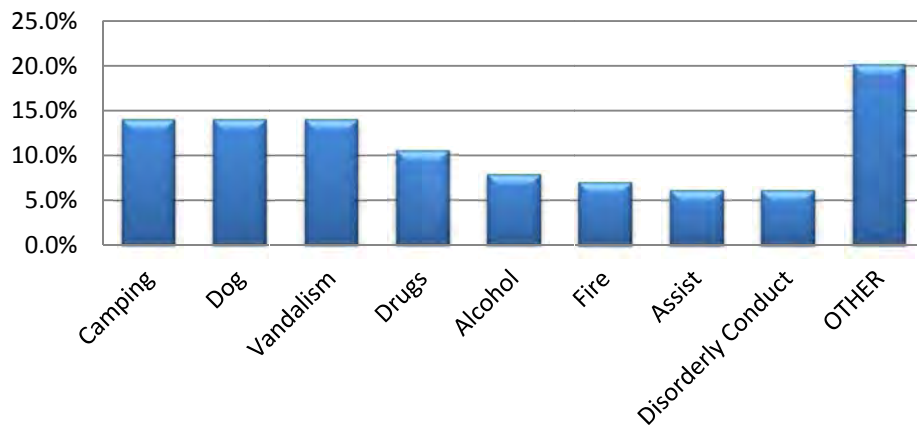
Sutro Heights Incidents - 2008

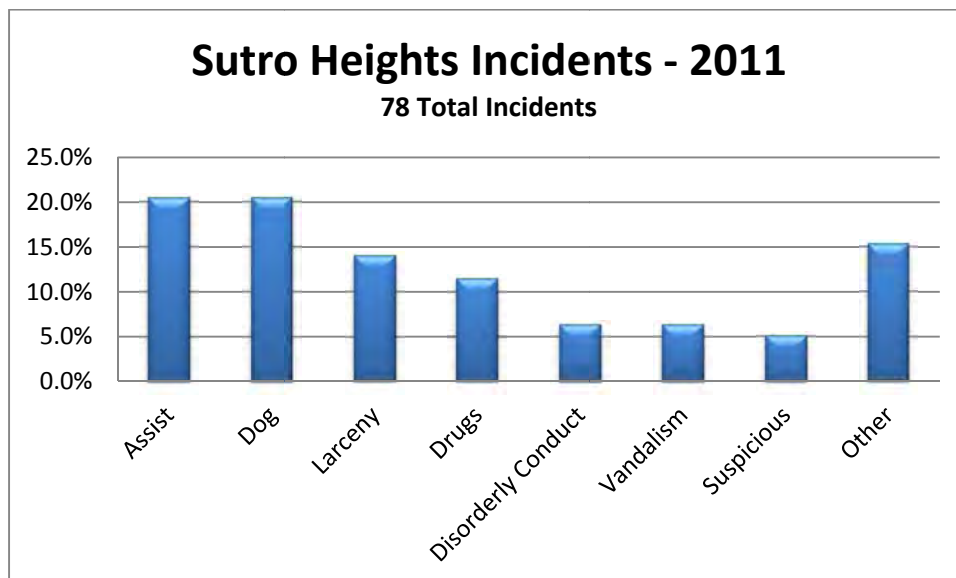
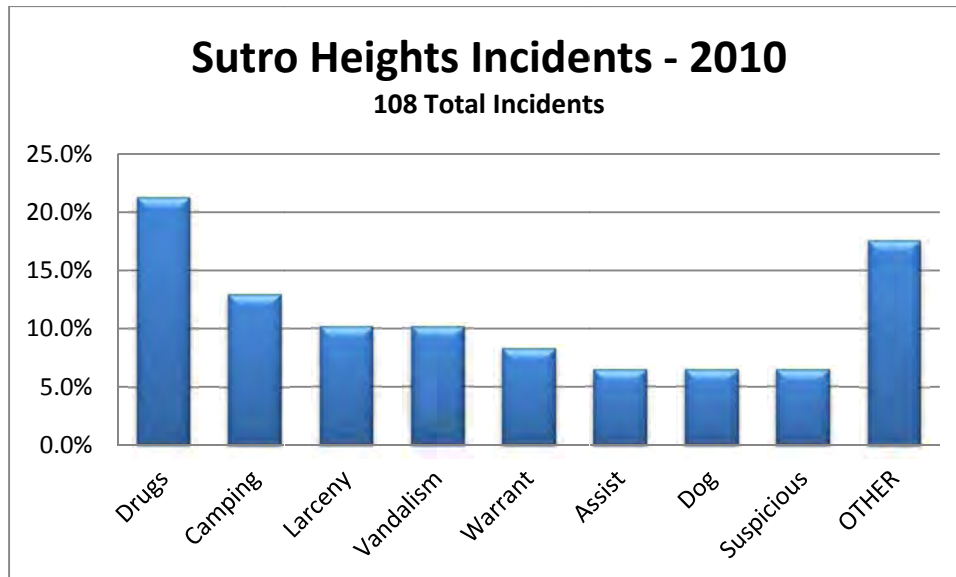
123 Total Incidents

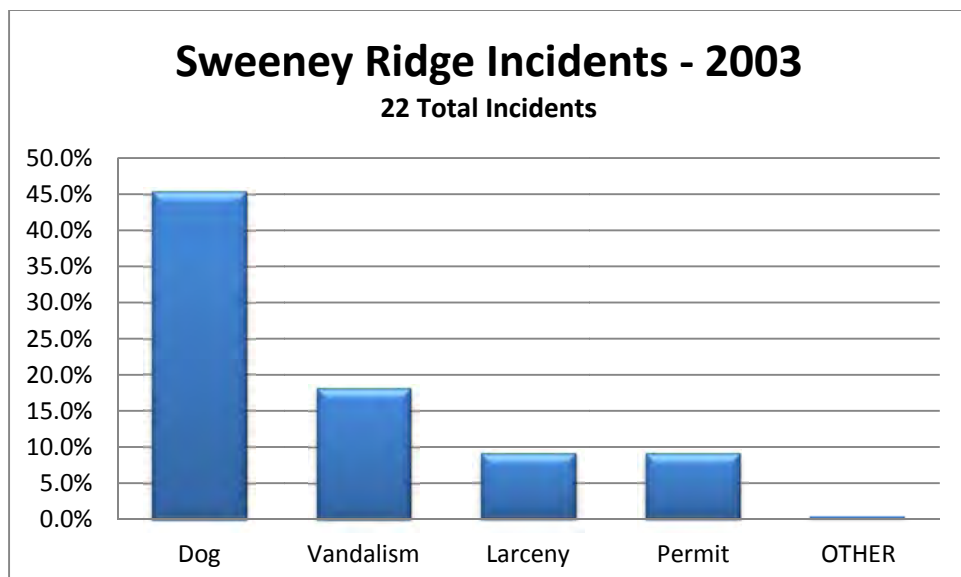
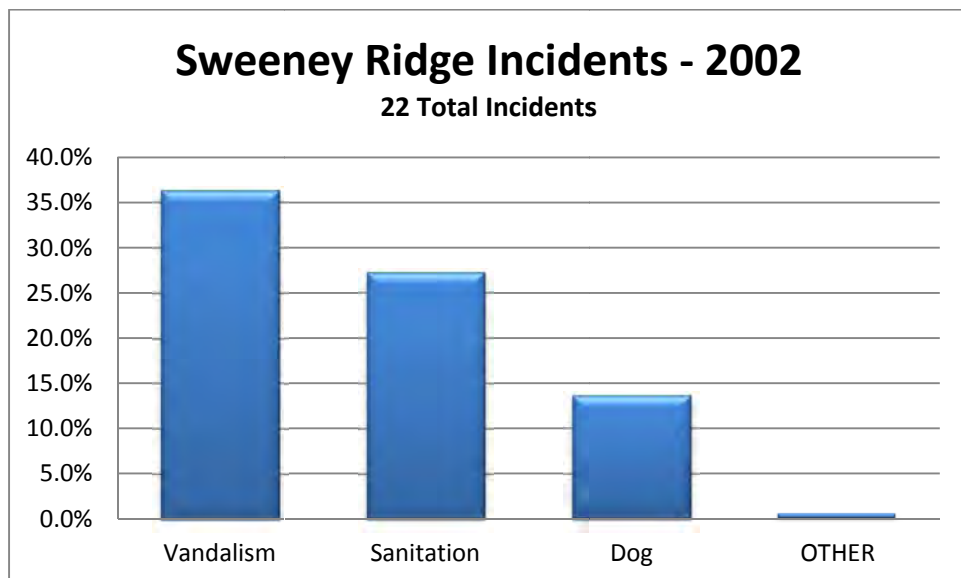
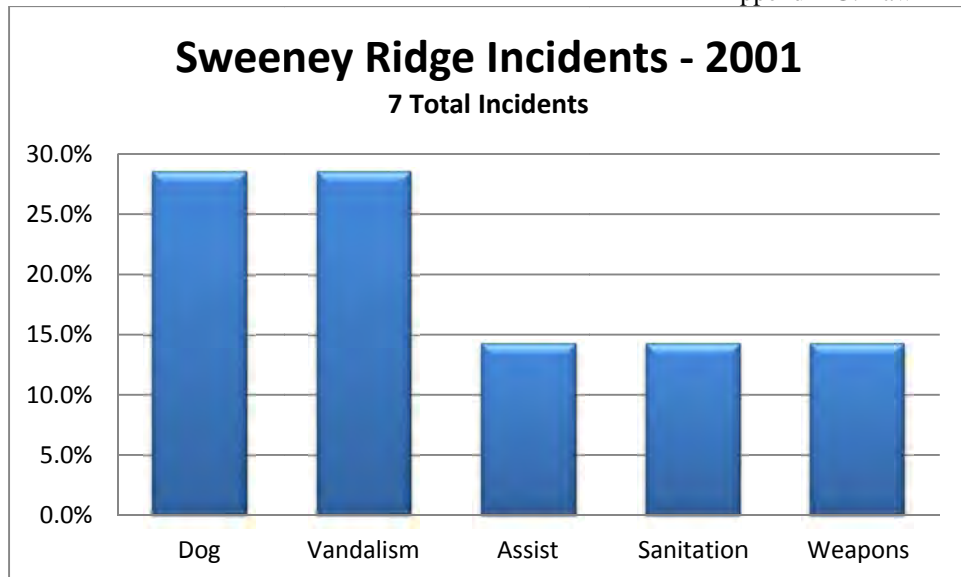


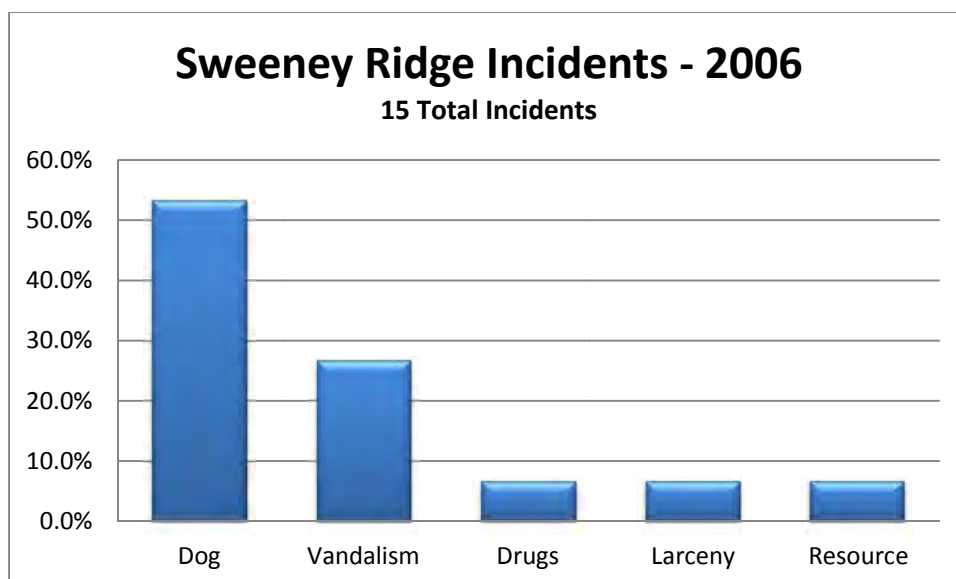
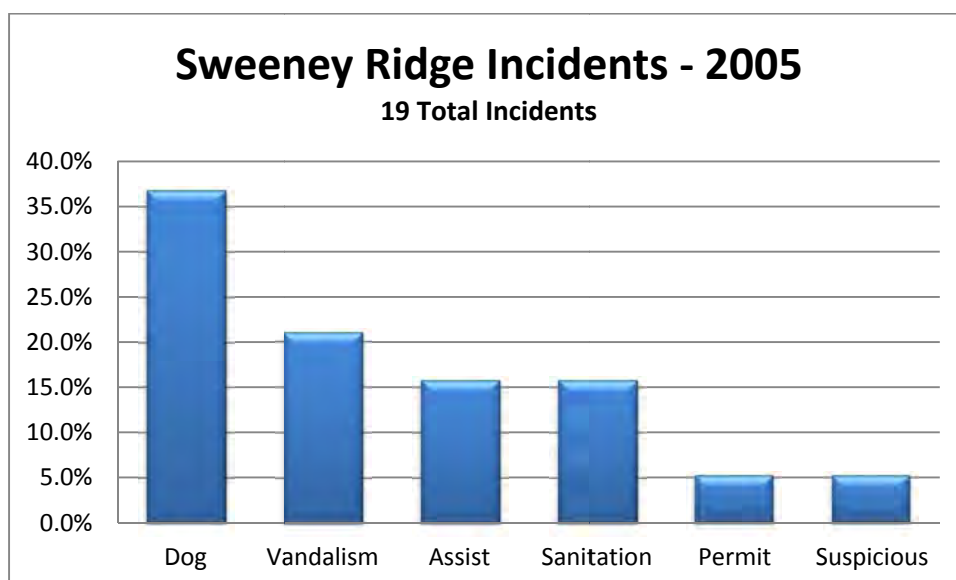
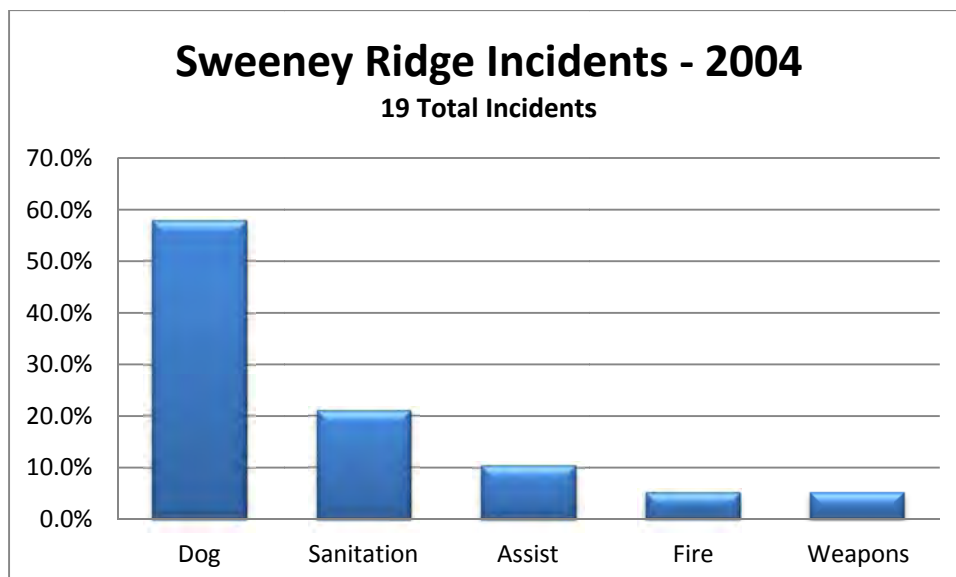
Sutro Heights Incidents - 2009

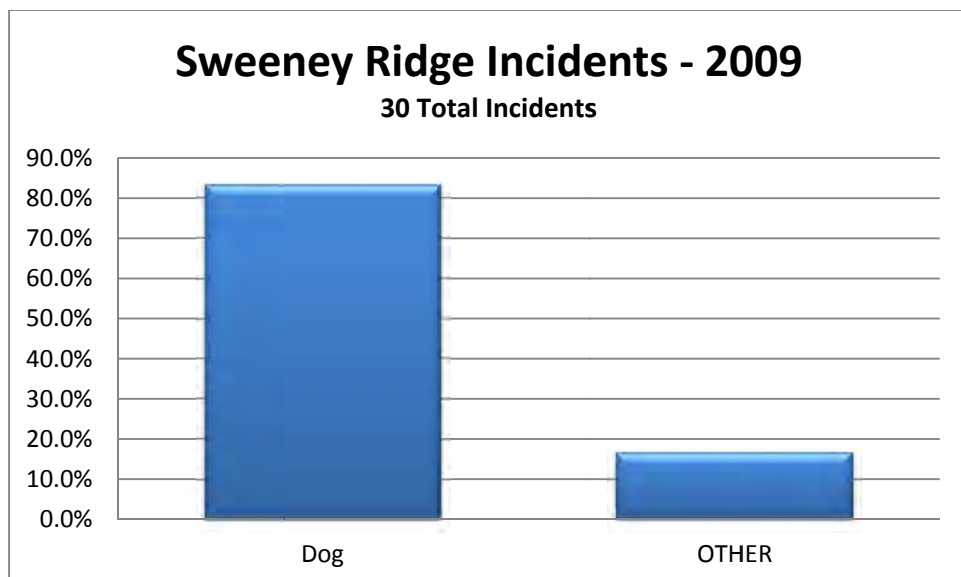
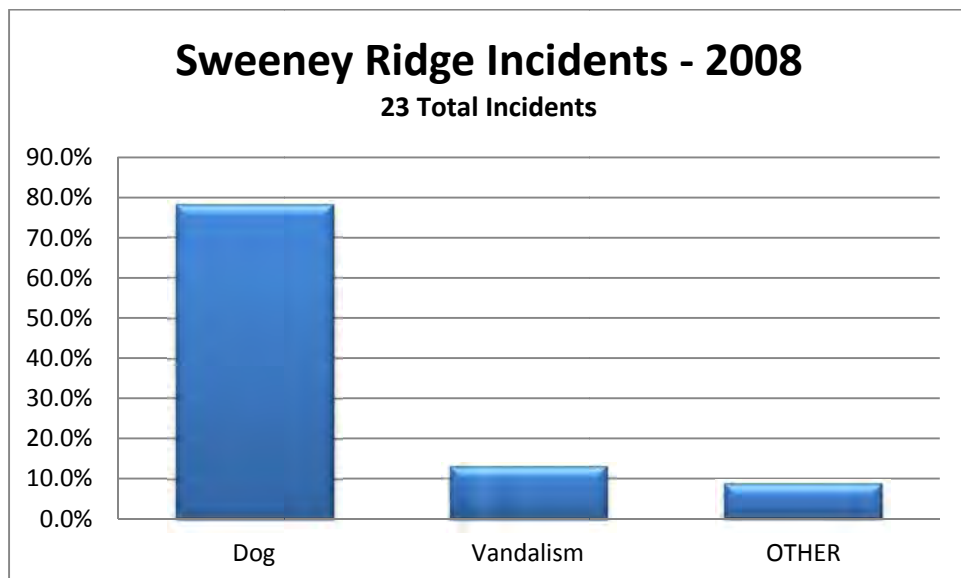
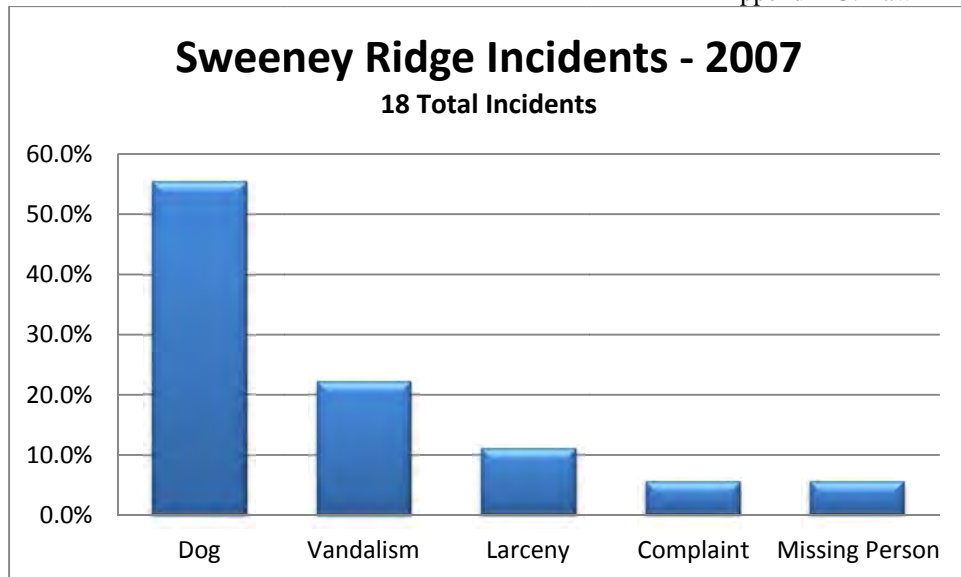
114 Total Incidents

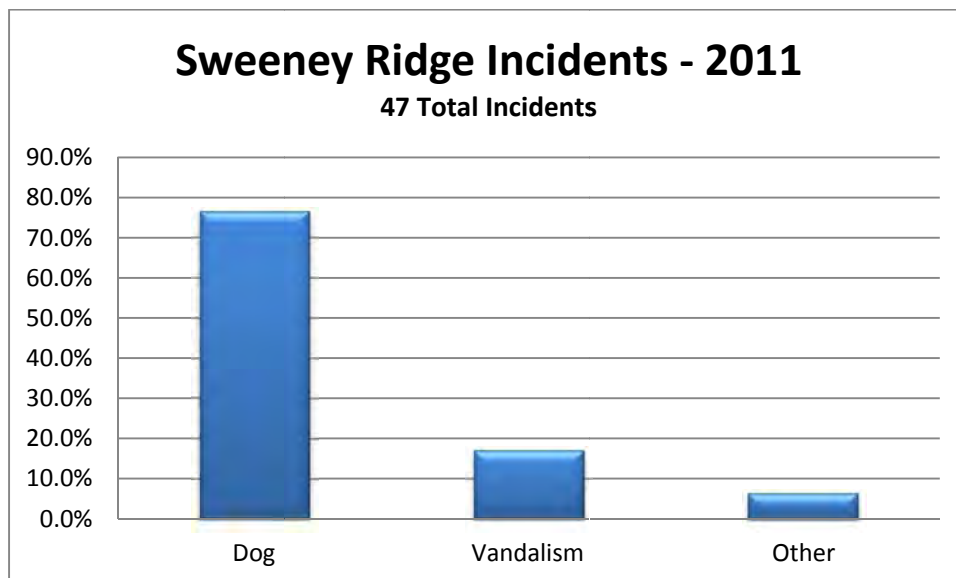
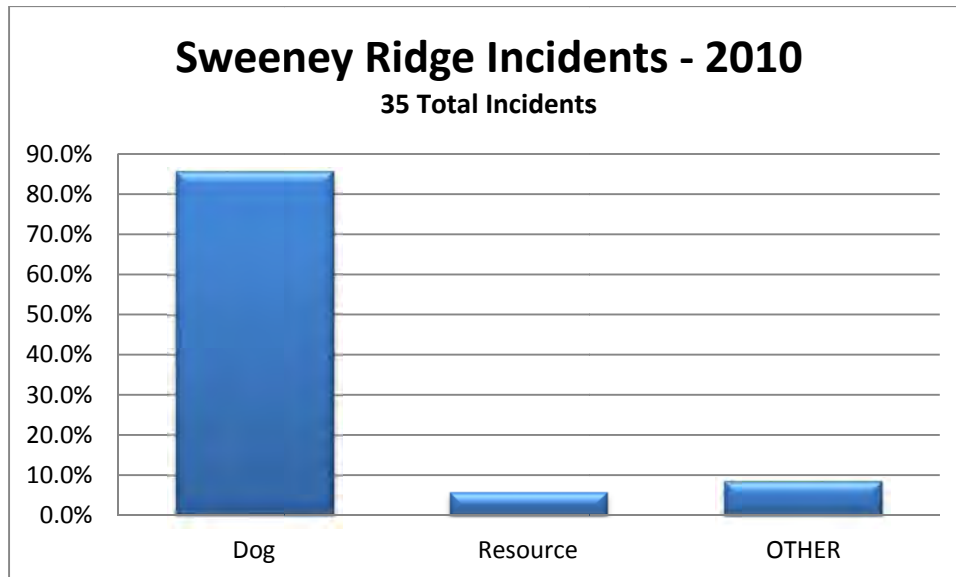




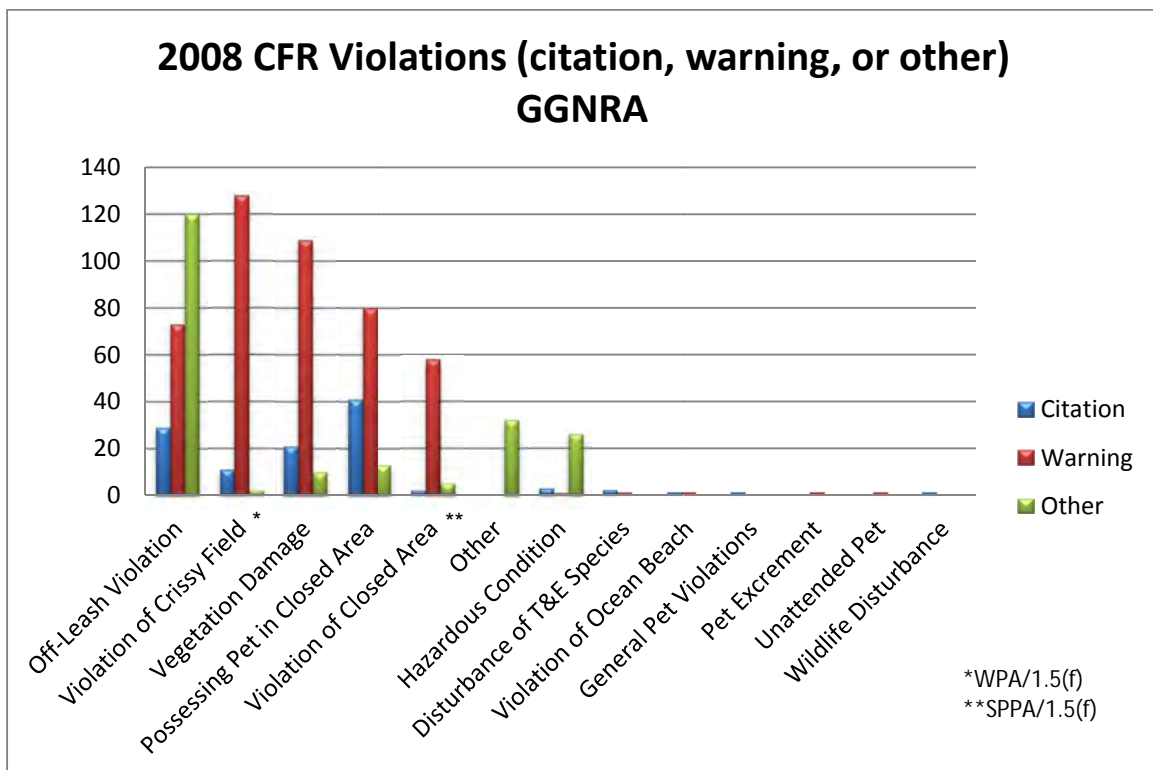
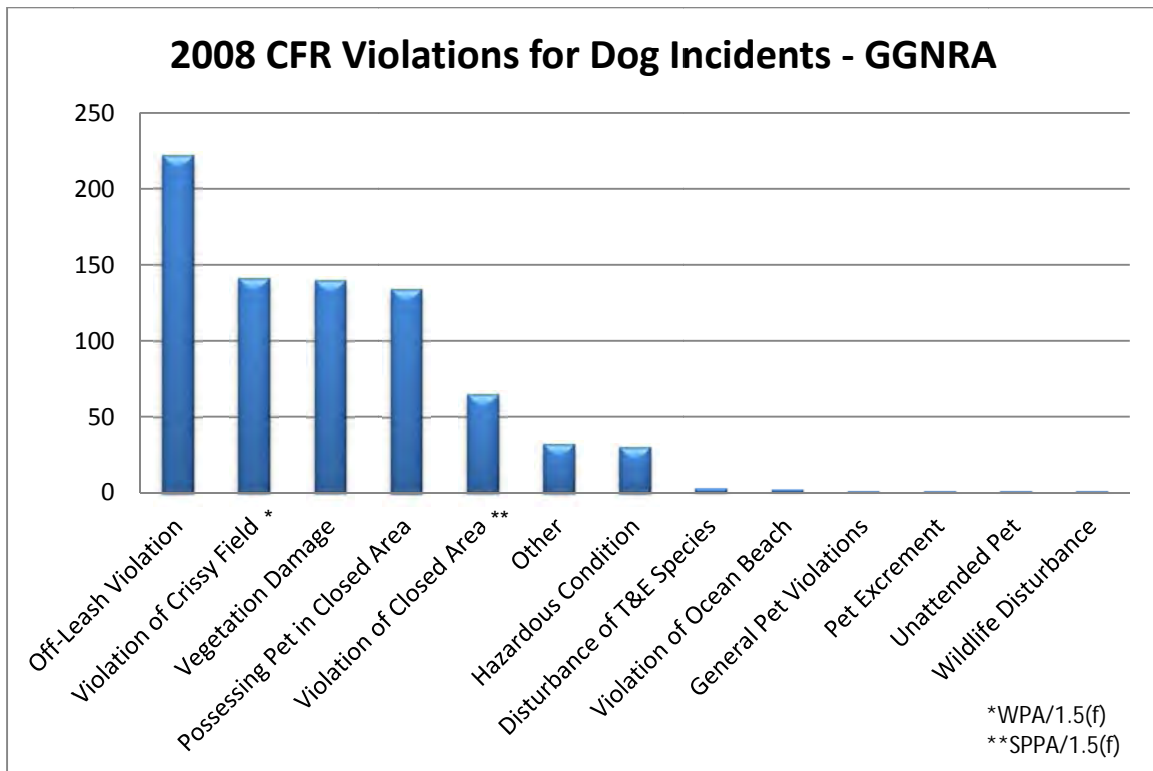




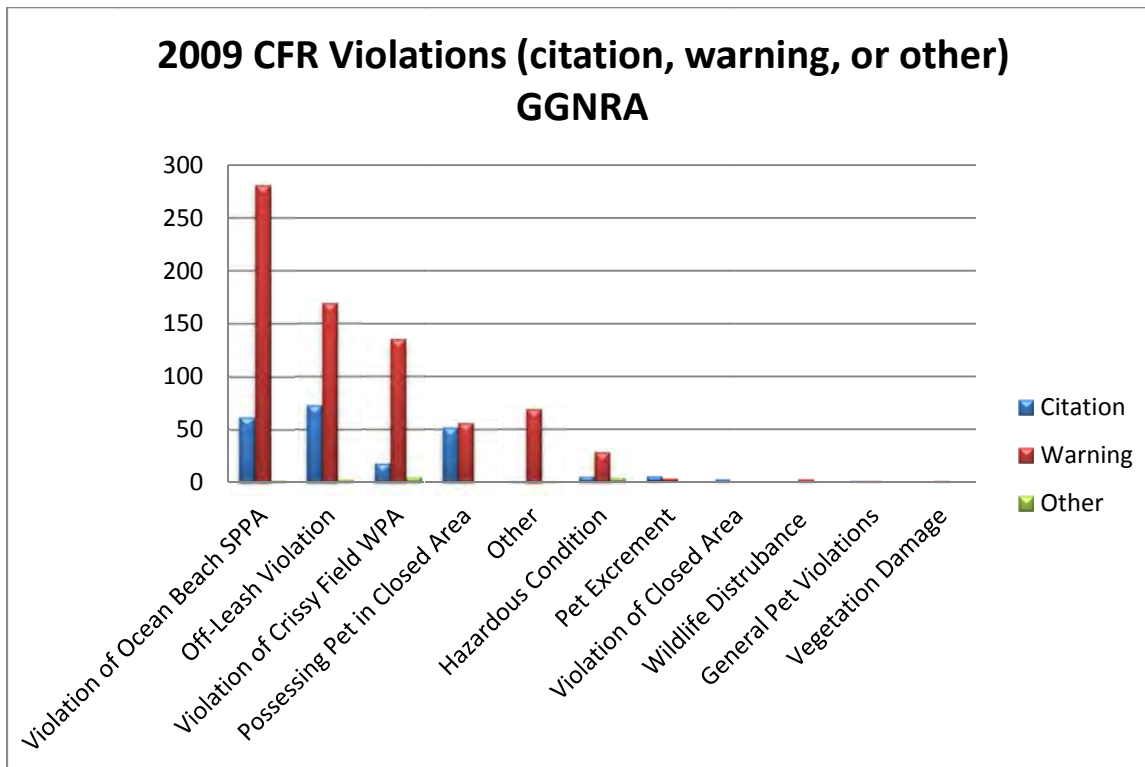
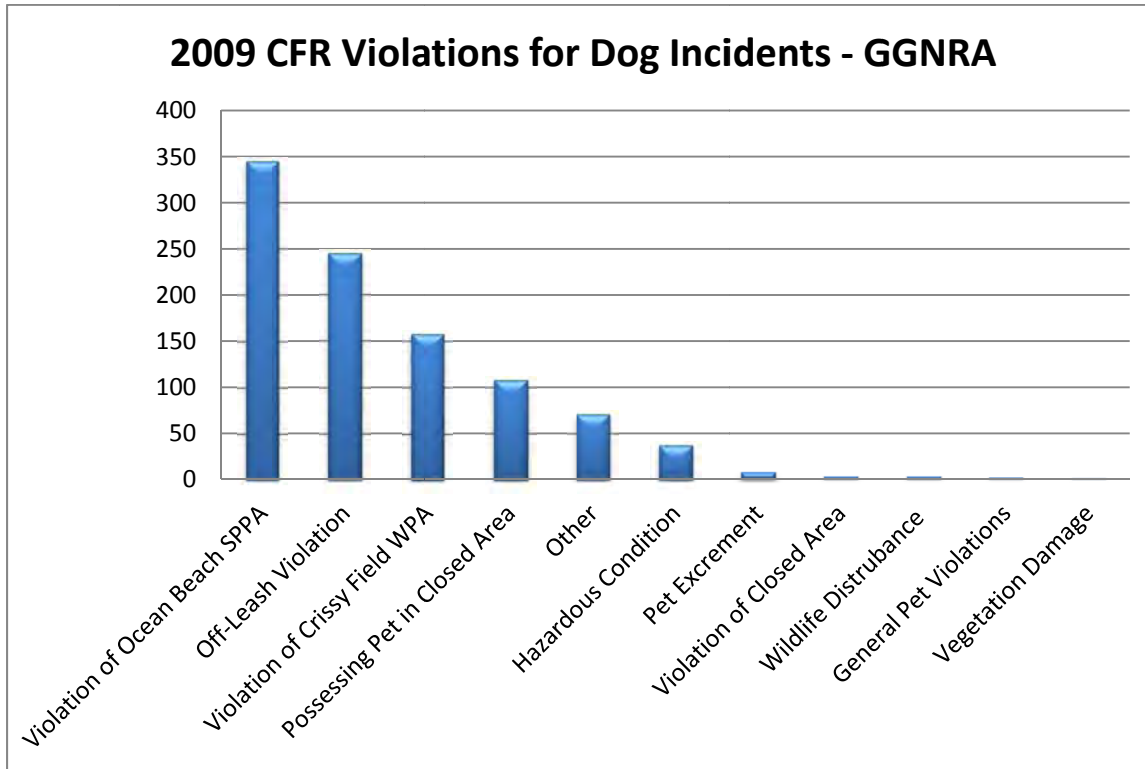


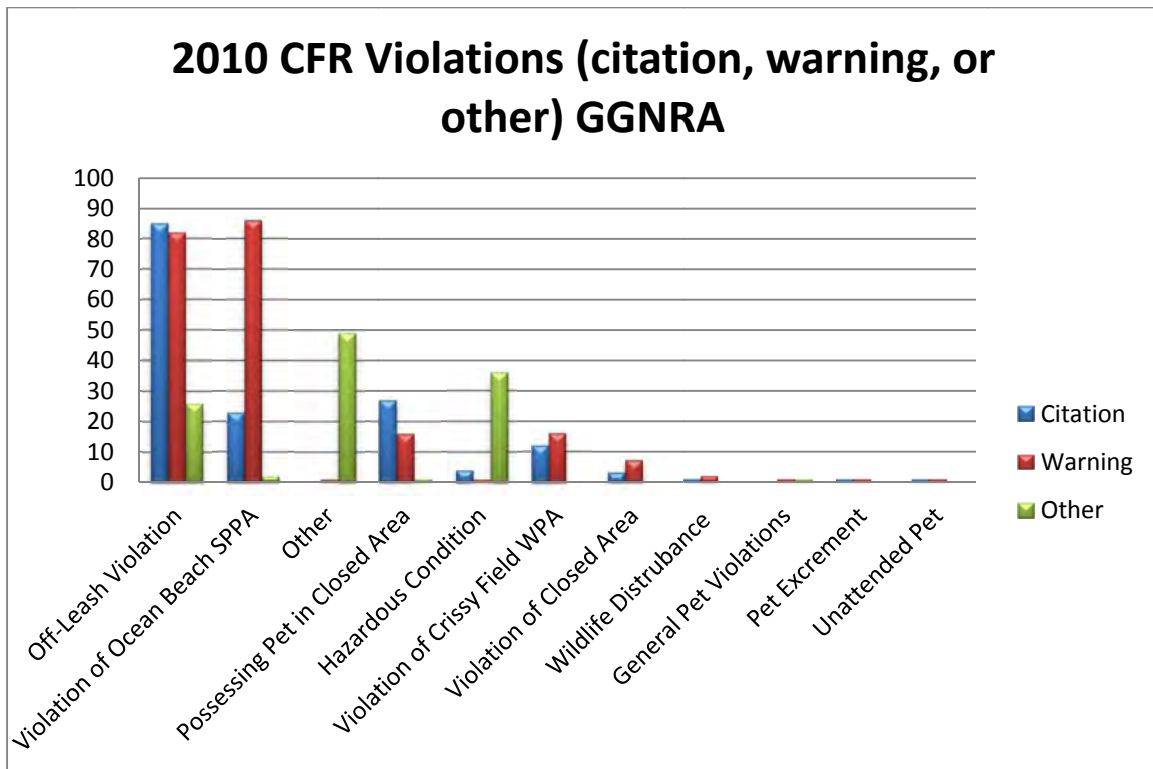
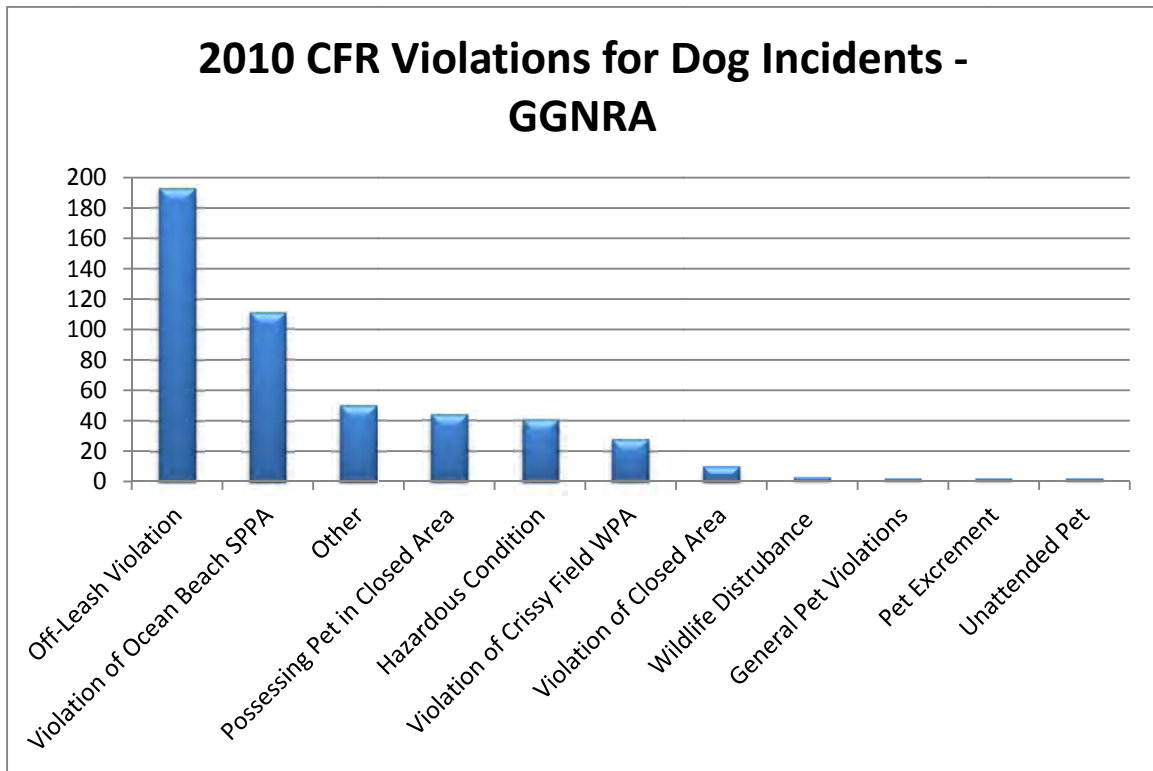


Attachment B: Graphs of LE Report Analysis for All Dog Related Incidents
B1.1 All of GGNRA - 2008

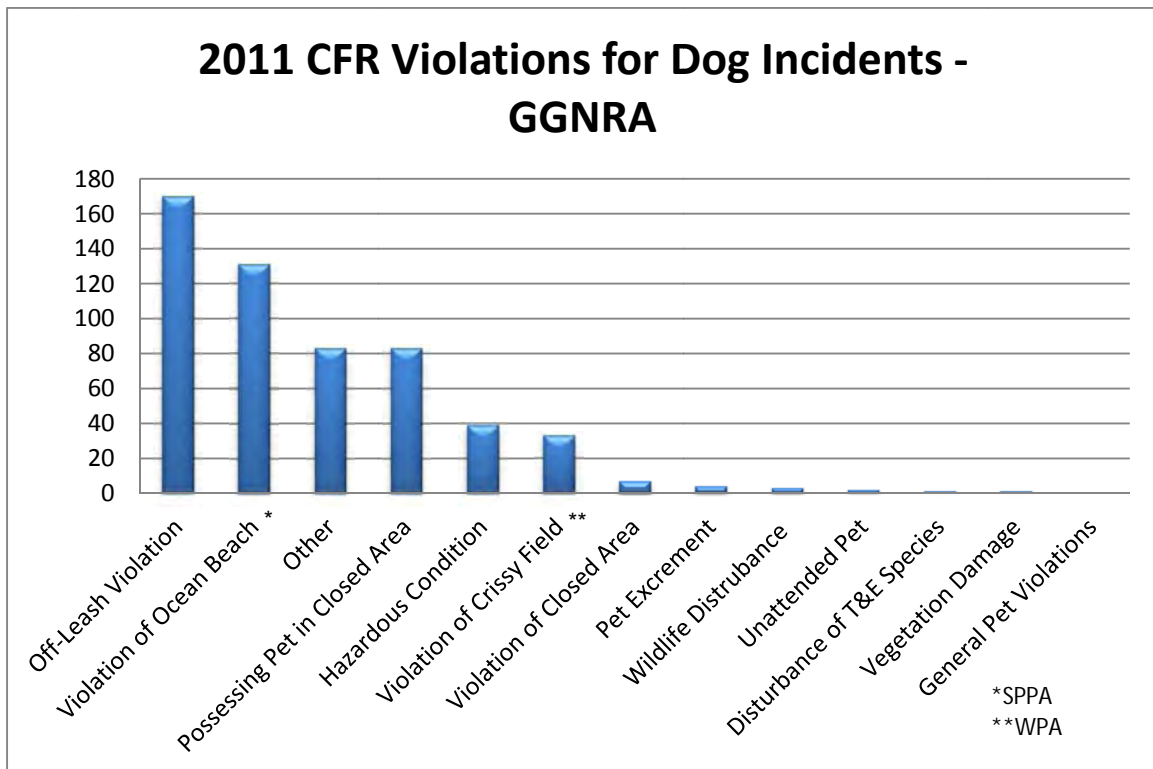
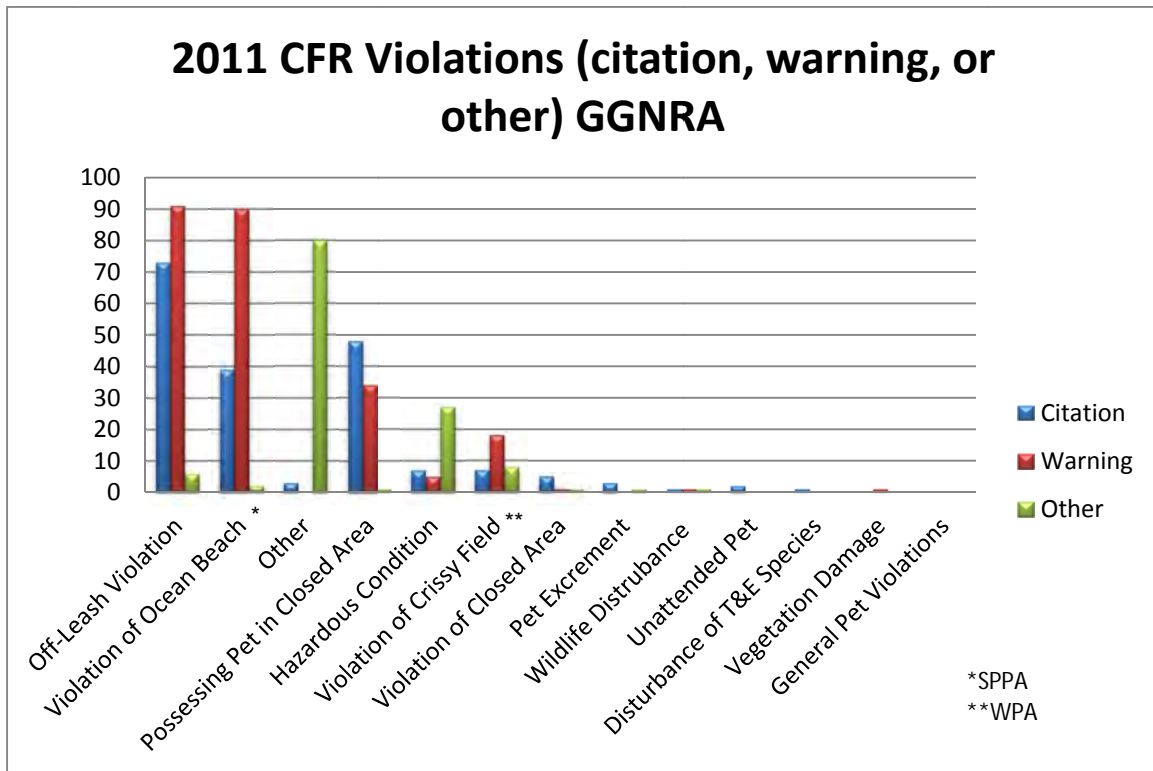


B1.2 All of GGNRA - 2009



B1.3 All of GGNRA - 2010

B1.3 All of GGNRA - 2011



APPENDIX H: SPECIAL-STATUS SPECIES

Scientific Name	Common Name	Federal Status	CNPS Status	State Status	Dominant Habitat Type or Occurrence Notes	Habitat Requirement and/or Association	Microhabitat	Species Distribution / Range	Mapped Occurrences or Potential Habitat at GGNRA Locations that are Analyzed in this Plan/SEIS
Invertebrate Species									
<i>Callophrys mossii bayensis</i>	San Bruno elfin butterfly	FE	n/a		Coastal Scrub.	Rocky outcrops and cliffs in coastal scrub habitat.	The larval host plant for the San Bruno elfin is <i>Sedum spathulifolium</i> , a succulent which grows on rocky, north-facing slopes along the coast.	Found in coastal mountains near San Francisco Bay, in the fog-belt of steep north facing slopes that receive little direct sunlight.	Milagra Ridge.
<i>Icaricia icarioides ssp. Missionensis</i>	Mission blue butterfly	FE	n/a		Coastal Scrub.	Mission blue butterflies are closely tied to three lupine larval host plants— <i>Lupinus albifrons</i> , <i>L. variicolor</i> , and <i>L. formosus</i> . These host plants tend to occur on grasslands on thin, rocky soils within broader coastal-scrub habitats.		Marin Headlands, the coastal ridges in San Mateo County, San Bruno Mountain, and possibly Twin Peaks in San Francisco.	Alta Trail/Orchard Fire Road/Pacheco Fire Road, Oakwood Valley, Marin Headlands Trails (Tennessee Valley), Fort Baker, Milagra Ridge, Sweeney Ridge/Cattle Hill, and Rancho Corral de Tierra.

Scientific Name	Common Name	Federal Status	CNPS Status	State Status	Dominant Habitat Type or Occurrence Notes	Habitat Requirement and/or Association	Microhabitat	Species Distribution / Range	Mapped Occurrences or Potential Habitat at GGNRA Locations that are Analyzed in this Plan/SEIS
Fish Species									
<i>Eucyclogobius newberryi</i>	Tidewater goby	FE, CH	n/a		Open Water.	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River.	Found in shallow lagoons and lower stream reaches.	Eastern Pacific: Del Norte County in northern California to Del Mar in southern California.	Rodeo Beach (Rodeo Lagoon).
<i>Oncorhynchus kisutch</i>	Coho salmon-- Central California coast	FE, CH	n/a	SE	Open Water.	Coastal streams draining to ocean (including those to San Francisco Bay) with spawning, juvenile rearing habitat, and migratory corridor.		The range of this Evolutionarily Significant Unit is from Punta Gorda in northern California to San Lorenzo River in central California, inclusive of San Francisco Bay streams.	Muir Beach (Redwood Creek).
<i>Oncorhynchus mykiss</i>	Steelhead — Central California Coast	FT, CH	n/a		Open Water.	Coastal streams draining to ocean (including those to San Francisco Bay) with spawning, juvenile rearing habitat, and migratory corridor.		California streams from the Russian River to Aptos Creek, and the drainages of San Francisco and San Pablo Bays eastward to the Napa River (inclusive),	Stinson Beach (Easkoot Creek), Muir Beach (Redwood Creek), Rodeo Beach (Rodeo Lagoon), Marin Headlands Trails (Rodeo Creek and Gerbode Creek), and Rancho Corral de Tierra (Martini and Denniston Creeks).

Scientific Name	Common Name	Federal Status	CNPS Status	State Status	Dominant Habitat Type or Occurrence Notes	Habitat Requirement and/or Association	Microhabitat	Species Distribution / Range	Mapped Occurrences or Potential Habitat at GGNRA Locations that are Analyzed in this Plan/SEIS
Reptile and Amphibian Species									
<i>Rana draytonii</i>	California red-legged frog	FT, CH	n/a		Wetlands.	Adult require a dense, shrubby or emergent riparian vegetation closely associated with deep (>0.7 meters) still or slow-moving water.		California red-legged frogs are still locally abundant within portions of the San Francisco Bay area (including Marin County) and the central coast. Within the remaining distribution of the species, only isolated populations have been documented in the Sierra Nevada, northern Coast, and northern Transverse ranges.	Muir Beach, Marin Headlands Trails (Rodeo Lake, Rodeo Lagoon, and Tennessee Valley), Mori Point, Milagra Ridge, Sweeney Ridge/Cattle Hill, Pedro Point, and Rancho Corral de Tierra.
<i>Thamnophis sirtalis tetrataenia</i>	San Francisco garter snake	FE	n/a	SE	Wetlands.	Prefer densely vegetated ponds with adjacent plants for basking. Preferred prey species is red-legged frogs. Aestivates in burrow holes.		Historically San Francisco peninsula currently known from South San Francisco near airport and Mori Point near Pacifica. Known occurrence at Mori Point.	Mori Point, Milagra Ridge, Sweeney Ridge / Cattle Hill, Pedro Point, and Rancho Corral de Tierra.

Scientific Name	Common Name	Federal Status	CNPS Status	State Status	Dominant Habitat Type or Occurrence Notes	Habitat Requirement and/or Association	Microhabitat	Species Distribution / Range	Mapped Occurrences or Potential Habitat at GGNRA Locations that are Analyzed in this Plan/SEIS
Bird Species									
<i>Charadrius alexandrinus nivosus</i>	Western snowy plover	FT, CH	n/a		Beach.	Coastal beaches, sand spits, dune-backed beaches, beaches at river mouths, salt pans at lagoons and estuaries, mud flats, and man-made salt ponds.		Breeds primarily on coastal beaches from southern Washington to southern Baja California, Mexico.	Crissy Field and Ocean Beach.
<i>Riparia riparia</i>	Bank swallow		n/a	ST	Beach - Rocky Coast.	(Nesting) colonial nester; nests primarily in riparian and other lowland habitats west of the desert.	Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting burrows.	Widespread in Northern Hemisphere. Winters in South America, Africa, South Asia.	Fort Funston.
<i>Strix occidentalis caurina</i>	Northern spotted owl	FT	n/a		Coniferous and evergreen forest.	Utilizes coniferous and mixed-hardwood forest areas for breeding in the project area, often in drainages.		The range encompasses an area from southwestern British Columbia south through the coastal mountains and Cascade Range (both west and east sides) of Washington and Oregon, south into southwestern Oregon and northwestern California north of San Francisco.	Homestead Valley, Oakwood Valley, and Marin Headlands Trails.

Scientific Name	Common Name	Federal Status	CNPS Status	State Status	Dominant Habitat Type or Occurrence Notes	Habitat Requirement and/or Association	Microhabitat	Species Distribution / Range	Mapped Occurrences or Potential Habitat at GGNRA Locations that are Analyzed in this Plan/SEIS
Mammal Species									
<i>Arctocephalus townsendi</i>	Guadalupe fur seal	FT	n/a	ST	Rarely occurs in project area; six strandings within project area have occurred through review of twelve years of data collected by the Marine Mammal Center (2000-2011).	Rocky habitat near ocean's edge.		Breeds along the eastern coast of Guadalupe Island, approximately 200 kilometers west of Baja California. In addition, individuals have been sighted in the southern California Channel Islands, including two males who established territories on San Nicolas Island.	Potential stranding on all beach areas.
<i>Eumetopias jubatus</i>	Steller sea lion	FT, CH	n/a		Unlikely to occur in project area; no strandings within project area have occurred through review of twelve years of data collected by the Marine Mammal Center (2000-2011).	Protected haul out sites.		Breeds from northern Channel Islands north to Aleutians and the Pribilofs. Breeding colony on Ano Nuevo Island.	Potential stranding on all beach areas.

Scientific Name	Common Name	Federal Status	CNPS Status	State Status	Dominant Habitat Type or Occurrence Notes	Habitat Requirement and/or Association	Microhabitat	Species Distribution / Range	Mapped Occurrences or Potential Habitat at GGNRA Locations that are Analyzed in this Plan/SEIS
Plant Species									
<i>Arenaria paludicola</i>	Marsh sandwort	FE	1B.1	SE	Wetlands.	Wetland and riparian ecosystems	Freshwater marshes with saturated, predominantly sandy soils from 3-170 meters.	Historically the West Coast. Today only a dozen individuals found in San Luis Obispo County. Two populations were reintroduced to Marin Headlands.	Marin Headlands Trails.
<i>Arctostaphylos franciscana</i>	Franciscan manzanita	FE	1B.1		Serpentine – Chaparral.	Scrub and chaparral communities.	Endemic to California; Found from 60-300 meters.	Localized in San Francisco. Only one wild plant at Presidio of San Francisco, which was transplanted to the Presidio (Area B).	Fort Point and Baker Beach.
<i>Arctostaphylos hookeri</i> ssp. <i>ravenii</i>	Presidio (Raven's) manzanita	FE	1B.1	SE	Serpentine – Chaparral.	Chaparral, coastal prairie, and coastal scrub.	Formerly endemic to San Francisco area. Found in open, rocky serpentine slopes from 20-215 meters.	Found along the North Central Coast (San Francisco Presidio). Only one wild plant and clones of this single plant remain.	Baker Beach.
<i>Clarkia franciscana</i>	Presidio clarkia	FE	1B.1	SE	Serpentine grassland.	Serpentine grassland	Only known in San Francisco and Alameda Counties. Serpentine soils around 50 meters in elevation.	Only five known occurrences in San Francisco and Alameda counties. Endemic to California.	Baker Beach.

Scientific Name	Common Name	Federal Status	CNPS Status	State Status	Dominant Habitat Type or Occurrence Notes	Habitat Requirement and/or Association	Microhabitat	Species Distribution / Range	Mapped Occurrences or Potential Habitat at GGNRA Locations that are Analyzed in this Plan/SEIS
<i>Hesperolinon congestum</i>	Marin dwarf-flax "Marin Western Flax"	FT	1B.1	ST	Serpentine – Grassland/ Chaparral.	Serpentine grassland/chaparral	In serpentine barrens and in serpentine grassland and chaparral. 30-365 meters.	Known only from Marin, San Francisco, and San Mateo Counties. NW San Francisco Bay Area. Occurs on Presidio coastal area.	Baker Beach.
<i>Lessingia germanorum</i>	San Francisco lessingia	FE	1B.1	SE	Dunes.	Dunes.	Known only from San Francisco and San Mateo counties. From remnant dunes. Open sandy soils relatively free of competing plants. 20-125 meters.	San Francisco Bay Area. Species located in the coastal habitat region of the Presidio (Special Status Vascular Plant Species Monitoring Report, GGNRA 2001).	Baker Beach and Fort Funston.
<i>Potentilla hickmanii</i>	Hickman's potentilla (Hickman's cinquefoil)	FE	1B.1	SE	Coastal prairie.	Coastal prairie.	Open coastal prairie intermixed with native perennial grasses and forbs.	Currently known from two populations in Monterey County and Rancho Corral de Tierra.	Mori Point, Pedro Point, and Rancho Corral de Tierra.

Notes: CH = critical habitat; CNPS = California Native Plant Society; FC = federal candidate; FE = federally endangered; FT = federally threatened; R = rare; ST = state threatened; SE = state endangered; SC = state candidate.

APPENDIX I: CULTURAL RESOURCES

LIST OF CULTURAL RESOURCES ANALYZED FOR GOLDEN GATE NATIONAL RECREATION AREA (GGNRA) DRAFT DOG MANAGEMENT PLAN / SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (PLAN/SEIS)

Cultural Resource	General Construction or Significance Date (if applicable)	General Location	Historic District/Landmark in which resource is located (if applicable)
Archeological Resources			
Muir Beach (CA-MRN-333)		Marin County	
Lands End (CA-SFR-5, CA-SFR-21)		San Francisco County	
Historic Structures			
Permanent Seacoast Fortifications			
Black Point	1863	Fort Mason	Fort Mason Historic District
Burnham	1899-1900	Fort Mason	Fort Mason Historic District
Cavallo	1872	Fort Baker	Fort Baker, Barry, Cronkhite (FBBC) Historic District
Duncan	1898-1899	Fort Baker	FBBC Historic District
Yates	1903	Fort Baker	FBBC Historic District
Chester	1899-1903	Fort Miley	Fort Miley Military Reservation
Livingston-Springer	1899-1902	Fort Miley	Fort Miley Military Reservation
Battery Construction #243	1943	Fort Miley	Fort Miley Military Reservation
East	1872	Fort Point	Presidio National Historic Landmark (NHL)
Chamberlin	1899-1903	Fort Scott	Presidio NHL
Cranston	1897-1898	Fort Scott	Presidio NHL
Marcus-Miller	1891-1898	Fort Scott	Presidio NHL
Godfrey	1892-1896	Fort Scott	Presidio NHL
Crosby	1899-1900	Fort Scott	Presidio NHL
Boutelle	1898-1901	Fort Scott	Presidio NHL
Davis	1936-1940	Fort Funston	
Miscellaneous Historic Structures			
Crissy Airfield	1919	Crissy Airfield	Presidio NHL

Cultural Resource	General Construction or Significance Date (if applicable)	General Location	Historic District/Landmark in which resource is located (if applicable)
Cultural Landscapes			
Fort Baker, Barry, and Chronkite Historic District (includes field fortifications; permanent seacoast fortifications and their integral earthworks)	1866	Marin County	
Presidio National Historic Landmark (includes USCGS, field fortifications, Crissy Field, and permanent seacoast fortifications and their integral earthworks)	1776	San Francisco County	
Fort Mason Historic District (includes permanent seacoast fortifications and their integral earthworks)	1855	San Francisco County	
Fort Miley Military Reservation (includes permanent seacoast fortifications and their integral earthworks)	1893	San Francisco County	
Rancho Corral de Tierra (includes landscapes features, structures, and archeological sites, including the Francisco Guerrero Adobe Site, and the Martini Creek Ohlone sites)	1839	San Mateo County	

APPENDIX J: NEARBY DOG WALKING AREAS

Name	Park Management*	Location	Size of Park	Notes
Marin County Nearby Dog Walking Areas (in order of study ranking)				
Upton Beach	Marin County	Adjacent to Stinson Beach	4 acres	Beach is on leash dog walking only, but off-leash dog walking may occur here.
Camino Alto Open Space Preserve	Marin County	Mill Valley; Escalon Rd.	170 acres	Dogs on leash on all trails; dogs off leash on all fire roads under voice command.
Blithedale Summit Open Space Preserve	Marin County	Mill Valley; Glen Dr.	899 acres	Dogs on leash on all trails; dogs off leash on all fire roads under voice command.
Mt. Tamalpais State Park	California Department of Parks and Recreation	Mill Valley	6,300 acres	Dogs on leash only in picnic areas and camping areas. No dogs allowed on trails, fire roads, or undeveloped areas.
Bolinas Beach	Marin County and Private Lands	Olema Bolinas Road, off Highway 1	Unknown	Dogs allowed off leash.
San Francisco County Nearby Dog Walking Areas (in order of study ranking)				
Pine Lake/Stern Grove	San Francisco Recreation and Parks Department (SFRPD)	Wawona neighborhood; Stern Grove is at 19th Ave. and Wawona; Pine Lake at Wawona Way and Crestlake	3.3 acres (Pine Lake DPA); 0.20 mile trail; 0.7-acre (Stern Grove Dog Play Area (DPA))	Off-leash areas in two DPAs and along the 0.2 mile Stern Grove Trail; this trail connects Pine Lake Meadow to Stern Grove on the north side of the park.
Golden Gate Park (all areas)	SFRPD	Sunset neighborhood; between Sunset and Richmond	1,017 acres; , 8.6 acres off-leash DPAs	There are four distinct DPA areas in the park (southeast, northeast, south central, and north central) where dogs are allowed off leash. Outside of the DPAs, dogs are allowed on leash, and can be walked on trails at the site.
McLaren Park	SFRPD	Bayview neighborhood; Shelly Dr. and Mansell St	59.9 acres off-leash DPA	Two separate DPAs: (1) 59-acre area bounded by Shelly Drive with fence along roadway (2) 0.9 acre adjacent to Natural Area with fence along roadway.
Alta Plaza Park	SFRPD	Pacific Heights neighborhood; between Scott and Steiner St.	0.5 acres off-leash DPA	Leash rule: Off leash in DPA, on leash in the park. Park is a large sloping expanse of grass with some landscaped plantings.

Name	Park Management*	Location	Size of Park	Notes
Glen Canyon Park	SFRPD	Glen Park neighborhood; Bosworth St. and Diamond Heights Blvd.	70 acres	Leash rule: Leashes required.
Bernal Heights	SFRPD	Bernal Heights neighborhood; Bernal Heights and Esmeralda	21 acres off-leash DPA	DPA located within Bernal Heights Natural Area.
The Presidio (Area B – managed by the Presidio Trust)	The Presidio Trust	Northwest tip of the San Francisco Peninsula; south of Mason St. and east of Lincoln Blvd.	Area B is approximately 1,170 acres	Dogs on leash where allowed in Presidio Area B.
Mountain Lake Park	SFRPD and the Presidio Trust	Richmond neighborhood; Lake St and 12th Ave	0.4 acres off-leash DPA	East end of the park has a DPA.
San Mateo County Nearby Dog Walking Areas (in order of study ranking)				
Montara State Beach (includes McNee Ranch)	California Department of Parks and Recreation	Montara	Unknown	Dogs allowed on a leash, six feet or shorter.
Quarry Park, El Granada	San Mateo County Department of Parks	El Granada; corner of Santa Maria Ave. and Columbus St.	40 acres	Dogs allowed on leash.
Half Moon Bay (Surfer's Beach)	California Department of Parks and Recreation	El Granada; along Highway 1	Unknown	Dogs allowed on leash.
Sharp Park	SFRPD	Pacifica; along Highway 1	Unknown	Dogs allowed on leash.
Pacifica State Beach (at Linda Mar)	City of Pacifica	Pacifica; along Highway 1	Unknown	Dogs allowed on leash on the beach.

APPENDIX K: PAST, PRESENT, AND FUTURE PROJECTS AND ACTIONS CONSIDERED FOR THE CUMULATIVE IMPACTS ANALYSIS

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Past/Completed Projects				
Giacomini Wetland Restoration Project	Tomales Bay	Wetland restoration	Project benefitted the Tomales Bay watershed ecosystem through wetland restoration. Included planting native vegetation at the Giacomini Ranch to increase habitat for listed species such as the tidewater goby and California clapper rail.	http://www.nps.gov/pore/parkmgmt/planning_giacomini_wrp_construction_summary_phase1.htm
Easkoot Creek Restoration	Stinson Beach	Habitat restoration for threatened central California coast steelhead trout and coho salmon	The restoration effort at the lower Easkoot Creek has improved summer and winter rearing habitat for the threatened central California coast steelhead trout and coho salmon both federally listed species. The project restored native vegetation and floodplain functions and features previously disturbed by human activities.	Easkoot Creek Restoration at Stinson Beach Environmental Assessment
Sewage Release	Homestead Valley	Sewage spill	More than 5 million gallons of partially treated sewage and storm water were released into Richardson Bay from the Mill Valley treatment plant. October 2007 inspections by U.S. Environmental Protection Agency confirmed the sewage collection systems at Almonte, Tamalpais, Homestead Valley, and Richardson Bay districts have deteriorating sewage pipes.	http://www.epa.gov/region09/water/npdes/pdf/SASM-SSO-report-final-2-11-08-redact.pdf
Tree Removal	Homestead Valley	Fire protection	During the fall of 2005, more than 100 trees were removed from 89 acres in Golden Gate National Recreation Area (GGNRA), to protect the adjacent community of Homestead Valley, where there are over 1,000 homes. Non-native Monterey pines, acacias, eucalyptus and plums, and encroaching Douglas firs were cut and piled for burning.	Golden Gate NRA Fire Management: Homestead Fuel Reduction Implements Community Wildfire Protection Plan (http://www.nps.gov/goga/parkmgmt/upload/firemanagement_news_homesteadfuelreduction.pdf) and Marin County Community Wildlife Fire Protection Plan (http://www.marinsheriff.org/uploads/documents/Marin%20CountyCommunity%20Wildfire%20Protection%20Plan.pdf)

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Lower Redwood Creek Interim Flood Reduction Measures and Floodplain/Channel Restoration	Muir Beach	Floodplain and channel restoration	This project restored channel function at the Pacific Way site to reduce flooding on an interim basis until long-term restoration project is implemented. The project also expanded riparian vegetation at the Banducci site, increased in-channel habitat complexity, reconnected the creek to its floodplain and reestablished geomorphic processes at the Banducci site to improve habitat for coho salmon and steelhead trout.	http://www.nps.gov/goga/parkmgmt/upload/redwoodcrk-ea-final.pdf
Trails Forever -Pirates Cove	South of Muir Beach	Control of invasive non-native plants	Pirates Cove is just south of Muir Beach, supports dense and relatively undisturbed coastal scrub, prairie, and riparian habitats. Non-native pampas grass has colonized the cliff faces over the past three decades, spreading inland in areas where non-natural disturbance has occurred. In 2006, Trails Forever began controlling the pampas grass invasion in an effort to maintain the natural habitat.	http://www.parksconservancy.org/our_work/trails/index.asp
Trails Forever - Marin Headlands	Marin Headlands	Control of invasive plants to increase natural diversity	Spreading infestations of non-native vegetation threaten the grassland and coastal scrub habitat of the Southern Marin Headlands that include plant species critical to the survival of the mission blue butterfly. Efforts to control target invasive species began in 2006.	http://www.parksconservancy.org/our_work/trails/index.asp
Fort Baker Plan	Fort Baker	Cultural resource restoration	Over 28 historic buildings are being rehabilitated to national historic preservation standards to ensure that the significant historic features are maintained. The project includes Cavallo Point: The Lodge at the Golden Gate, a resort, and the Institute at the Golden Gate, a retreat and conference center, as well as infrastructure upgrades, waterfront improvements and native habitat restoration. The new lodging units are environmentally friendly and architecturally sensitive to the historic area. Landscape improvements include the restoration of the main parade ground by National Park Service (NPS) to its historic period.	http://parkplanning.nps.gov/document.t.cfm?parkID=303&projectId=20244&documentID=20847
Trails Forever – Fort Mason	Fort Mason	Transportation	The effort to improve the San Francisco Bay Trail at Laguna and Marina Boulevard is part of Trails Forever. Project objectives were to enhance visitor safety and experience, improve pedestrian and bicyclist traffic flow, and re-vegetate the landscape.	http://sfbike.org/download/ft_mason_squeeze.pdf

Appendix K: Past, Present, and Future Projects and Actions Considered for the Cumulative Impacts Analysis

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Fort Mason Center Long-term Lease Environmental Assessment (FONSI)	Fort Mason	Programming and management	After completion of the environmental assessment, NPS entered into a long-term lease with Fort Mason Center to continue its public programming and management of Lower Fort Mason.	http://parkplanning.nps.gov/showFile.cfm?projectId=20253&docType=public&MIMEType=application%252Fpdf&filename=FOMA%20Long%20Term%20Lease%2Epdf&clientFilename=FOMA%20Long%20Term%20Lease%2Epdf
Crissy Field Plan	Crissy Field	Restoration	This project resulted in the restoration of approximately 18 acres of tidal marsh at Crissy Field; a channel was opened to the tides, allowing fresh and salt water to merge at Crissy Field for the first time in 100 years. This plan proposed increased dog-walking opportunities at the park.	
Crissy Field Center Temporary Move to East Beach	Crissy Field	Facilities	As a result of California Department of Transportation's receipt of funds from the American Recovery and Reinvestment Act, the Doyle Drive improvement project was fast-tracked, and consequently Crissy Field Center needed to move its operations from 603 Old Mason in late 2009.	http://www.parksconservancy.org/our-work/crissy/temporary-relocation.html
Lobos Creek Valley Dune Restoration	Lobos Creek, near Baker Beach	Habitat restoration	Habitat restoration project at coastal dune in Lobos Creek Valley to increase population of the listed San Francisco lessingia plant.	
Trails Forever – Lands End	Lands End	Transportation	The project included resurfacing and stabilizing additional segments of the trail; creating open views to the ocean; eliminating damaged “social” trails; replanting native species in the local forest and surrounding areas; improving visitor amenities; and engaging the community in park stewardship.	http://www.parksconservancy.org/our-work/trails-forever/accomplishments/lands-end.html
Sutro Dunes Stabilization/Native Planting	Sutro Heights Park	Erosion control	Sutro Dunes was planted with native plants in order to restore the site.	http://www.sfexaminer.com/local/Sutro-Dunes-blooming-like-new-81069857.html
Site Management Plan for Milagra Ridge	Milagra Ridge	Management project	Site Management Plans are completed for acquired properties at GGNRA, such as Milagra Ridge. This plan may include a statement to protect and enhance habitat at the site, such as mission blue butterfly habitat at Milagra Ridge in coordination with the GGNRA and U.S. Fish and Wildlife Service (USFWS).	N/A

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Current Projects (Construction Underway or Planning in Progress or Complete)				
GGNRA Fire Management Plan	Parkwide	Land use plan, enhance mission blue butterfly habitat, preserve historic structures, landscapes, and archeological resources	One of the many goals of the GGNRA Fire Management Program is to protect natural resources from adverse effects of fire and fire management activities, and use fire management wherever appropriate to sustain and restore natural resources. Another goal is to preserve historic structures, landscapes, and archeological resources from adverse effects of fire and fire management activities, and use fire management wherever appropriate to rehabilitate or restore these cultural resources.	Final Environmental Impact Statement for Fire Management Plan; GGNRA, Muir Woods National Monument and Fort Point National Historic Site; Marin, San Francisco and San Mateo Counties, CA (NPS 2005)
Air Tour Management Plan, GGNRA and Point Reyes National Seashore	Parkwide	Management plan	This Air Tour Management Plan addresses the impacts of commercial air tours over GGNRA and Point Reyes National Seashore to develop acceptable and effective measures to mitigate adverse impacts of commercial air tours on natural and cultural resources, and on visitor experience.	http://www.nps.gov/pore/parkmgmt/upload/planning_atmp_mailer_110728.pdf
34th America's Cup Event	Parkwide	Sailing race	The 34th America's Cup event brings sailing teams from around the world to race within San Francisco Bay; preliminary races were held in 2012; the America's Cup race is in 2013. The event includes a sustainability plan to determine and mitigate impacts from the event. Preliminary events and event related construction occurred in 2012.	http://cdn.sparkart.net/americascup/content/documents/sustainability/AC34-Sustainability-Plan_19-March-2012.pdf
Dias Ridge Restoration and Trail Improvement	Marin County	Restoration and trail Improvement	The project will realign trail segments and restore degraded areas on Dias Ridge. Specifically, the project will remove unauthorized trails and replace or rehabilitate poorly aligned and eroding trail segments. This project will improve parkland resources by reducing soil erosion in the project, minimize sediment from reaching Redwood Creek, and improve the trail alignment to support existing authorized trail-use designations.	http://www.nps.gov/goga/parkmgmt/planning.htm
Redwood Creek Watershed Restoration	Redwood Creek Watershed, Marin County	Watershed restoration visioning process	The project (Redwood Creek Watershed: Vision for the Future) included identifying issues and values in the watershed and defining future conditions to create a Redwood Creek watershed that exists as a natural ecosystem and offers opportunities to learn, experience, and protect nature, rural character, and cultural history in an urbanized area.	http://www.nps.gov/goga/parkmgmt/upload/RWC_Vision_Statement.pdf
Cosco Busan Recreational Use Restoration Projects Plan	San Francisco and Marin Counties	Site improvements and habitat restoration	The study will determine improvement projects to be completed in Marin and San Francisco counties with the \$9.75 Million in settlement funds from the Cosco Busan oil spill. Recreation/visitor use and access-related projects are proposed at Muir Beach, Stinson Beach, Rodeo Beach, Ocean Beach, Fort Mason, Crissy Field, Baker Beach, and parkwide.	http://parkplanning.nps.gov/projectHome.cfm?projectId=44006

Appendix K: Past, Present, and Future Projects and Actions Considered for the Cumulative Impacts Analysis

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Monterey Bay National Marine Sanctuary Boundary Adjustment/ Environmental Impact Statement (EIS)	San Francisco County	Boundary adjustment	National Oceanic and Atmospheric Administration has initiated a review of the Monterey Bay National Marine Sanctuary boundaries, to evaluate the opportunity and effects of expanding the sanctuary's boundary to include the San Francisco-Pacifica Exclusion Area. This area was initially excluded due to pollution, vessel traffic, and dredge spoil deposits, but these conditions have since been alleviated. Ocean Beach would be added to the Monterey Bay National Marine Sanctuary under this plan.	https://www.federalregister.gov/articles/2012/08/07/2012-19105/revisions-of-boundaries-for-the-monterey-bay-national-marine-sanctuary-intent-to-prepare-an
Significant Natural Resource Areas Management Plan	San Francisco and Pacifica	Planning document	The Significant Natural Resource Areas Management Plan guides natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years. The scope of the Significant Natural Resource Areas Management Plan includes "Natural Areas" managed by the San Francisco Recreation and Park Department (SFRPD) in San Francisco and Pacifica and addresses dog walking (including on-leash dog walking and off-leash dog play areas) in these areas.	Environmental Impact Report: Significant Natural Resource Areas Management Plan (SFPD 2011)
Nonpoint Source Watershed Assessment for the James Fitzgerald Marine Reserve Critical Coastal Area	Martini Creek watershed, San Mateo County	Watershed assessment	Project could benefit Hickman's potentilla through the development of an Action Plan to address potential and known nonpoint source pollution impacts and improve water quality conditions in and around the Fitzgerald Marine Reserve critical coastal area.	http://www.coastal.ca.gov/nps/Web/ca_project.htm
Coho and Steelhead Restoration Project	Pine Gulch, Redwood, Olema, and Lagunitas creeks	Salmonid restoration	Initiated by the NPS, project includes assessing current coho salmon and steelhead abundance and distribution and developing and implementing a plan for restoring and monitoring the fish and their habitat.	http://www.nps.gov/pore/naturescience/fish.htm
Accessibility Site Improvements at Fort Mason Bldg. 201, Baker Beach, Stinson Beach, Battery Spencer and Kirby Cove	Stinson Beach, Marin Headlands, Fort Mason, Baker Beach	Accessibility site improvements	Fort Mason, Bldg. 201, Baker Beach, Stinson Beach, Battery Spencer and Kirby Cove (Marin Headlands) have been identified as key sites targeted for increasing accessibility in GGNRA. The project results will include improvements in accessibility of picnic areas, camping views, beaches, restrooms, interpretive and wayfinding signs, and parking and accessible routes to these amenities. Project includes site-specific elements that will improve accessibility and the visitor experience	https://pepc.nps.gov/projectHome.cfm?projectId=38854

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Submarine Discharge of Nutrient-enriched Fresh Groundwater	Stinson Beach	Septic tank discharge	Nutrients are discharged into groundwater at Stinson Beach from septic tanks; discharge is affected by variations in tides and is greater during neap tides (minimum tide range) as compared to spring tides (maximum tide range).	Sieyes, N.R., K.M. Yamahara, B.A. Layton, E.H. Joyce, and A.B. Boehm. 2008. Limnology and Oceanography 53(4)4134-1445 at http://aslo.org/lo/toc/vol_53/issue_4/1434.pdf
City of Mill Valley Bicycle and Pedestrian Transportation Plan Update	Homestead Valley	Transportation	The 2008 plan is an update to the 2003 Mill Valley Bicycle and Pedestrian Transportation Plan Update and builds upon and furthers the goals and projects originally developed in the 1982 Plan which was updated in 2003 to include a pedestrian component. Bicycling and walking contribute to both a healthy personal lifestyle and the health of the entire City through lessened traffic congestion, reduced vehicle exhaust emissions, decreased noise levels, and a reduction in land dedicated towards automobile parking. These modes also present residents with the opportunity to more easily socialize in public spaces.	http://www.cityofmillvalley.org/Modules/ShowDocument.aspx?documentid=3320
Wetland and Creek Restoration at Big Lagoon	Muir Beach	Ecological restoration	Project aims to restore a functional, self-sustaining ecosystem at Big Lagoon. The project includes wetland, riparian and aquatic components to re-create habitat for sustainable populations of special status species, including habitat for coho salmon and steelhead trout as well as California red-legged frog, to reduce flooding, and to improve visitor experience. Project is located at Muir Beach and includes 38 coastal acres including the small intermittent tidal lagoon at the beach.	http://parkplanning.nps.gov/document.t.cfm?parkID=303&projectId=12126&documentID=21520
Marine Mammal Center Site and Facilities Improvements	Marin Headlands	Facilities improvements	Recent improvements to the Marine Mammal Center located just northeast of Fort Cronkhite in the Forts Baker, Barry, Cronkhite Historic District have resulted in minor cumulative adverse effects to cultural resources, none of which has significantly affected the integrity of the district.	NPS 2004; http://www.nps.gov/goga/parkmgmt/mmc.htm
Marin Headlands and Fort Baker Transportation Infrastructure and Management Plan	Marin Headlands	Land use plan, improved visitor experience	This project focuses on providing greater access to and within the Marin Headlands and Fort Baker for a variety of users in a way that minimizes impacts to the rich natural diversity and cultural resources of the Marin Headlands and Fort Baker.	http://www.nps.gov/goga/parknews/mahe_transportation.htm

Appendix K: Past, Present, and Future Projects and Actions Considered for the Cumulative Impacts Analysis

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Accessibility Upgrades to Kirby Cove Campground, Marin Headlands	Marin Headlands	Accessibility site improvements	Kirby Cove, located in the Marin Headlands, provides five campsites and a day use picnic area, as well as a historic Artillery Battery Kirby. The project will redesign entry gates, campsites, picnic areas, paths, parking, grills, fire pits, tables, and other amenities so that they are accessible. Project design will be done in keeping with the historic landscape and cultural resources.	https://pepc.nps.gov/projectHome.cfm?projectId=44924
Golden Gate Bridge Seismic Retrofit	Fort Baker	Mitigation	Planned restoration of mission blue butterfly habitat as mitigation for the Golden Gate Bridge seismic retrofit work at Fort Baker.	
Sausalito-Marín City Sanitation District Sewage Spill	Fort Baker	Sewage spill	About 40,000 gallons of diluted raw sewage spilled into Richardson Bay north of Fort Baker on about January 19, 2010. The spill is being investigated by the state Water Quality Control Board.	http://www.contracostatimes.com/news/ci_14227944?ncklick_check=1
Alcatraz Ferry Embarkation Project	Fort Baker, Fort Mason	Study and management plan	The project will evaluate long-term embarkation site from the San Francisco waterfront to Alcatraz, as well as ferry service from the San Francisco embarkation site to existing piers at Sausalito and/or Fort Baker.	http://parkplanning.nps.gov/projectHome.cfm?projectId=41352
Extension of Historic Streetcar Service	Fort Mason	Transportation	The proposed historic streetcar extension would continue the F-line three blocks west to San Francisco Maritime National Historic Parkway and then on through the Fort Mason Tunnel to the Fort Mason Center at GGNRA.	http://www.historicstreetcarextension.org/
South Access to the Golden Gate Bridge - Doyle Drive Final EIS	Crissy Field	Transportation project	Doyle Drive, also known as Route 101, is located within the Presidio, and it provides access to cultural and natural features within GGNRA. The Federal Highway Administration, the California Department of Transportation, and the San Francisco County Transportation Authority (the Authority) proposed to improve seismic, structural, and traffic safety along Doyle Drive.	http://www.presidioparkway.org/project_docs/
Presidio Trails and Bikeways Master Plan	Presidio	Trails and bikeways	Project provides the public with an interconnected, safe, and enjoyable trails and bikeways system, while protecting and managing the Presidio's natural and cultural resources (NPS 2010i).	http://www.nps.gov/goga/parkmgmt/prsf_trails-bikes_masterplan.htm

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Vegetation Management Plan for the Presidio of San Francisco	Presidio	Habitat restoration	The NPS partnered with the Presidio Trust and the Golden Gate National Parks Association and prepared a vegetation management plan to ensure that the Presidio's landscape and native habitats survive. The plan included a variety of restoration activities throughout the Presidio and recommended that changes be made gradually over the next several decades so that visual impacts of rehabilitation can be minimized as much as possible.	NPS and Trust 2001; http://www.presidiotrust.gov/archive/documents/Veg_Mngmnt_Plan_Sum.html
Presidio Trust Management Plan (PTMP)	Presidio (Area B)	Planning document	The PTMP includes the preservation of the Presidio's cultural, natural, scenic, and recreational resources. The PTMP focuses on the long-term preservation of the park, including replacing pavement with green space, improving and enlarging the park's trail system, restoring stream corridors and natural habitats, and reusing historic structures.	http://www.presidio.gov/about/Pages/Presidio-Trust-Management-Plan.aspx
Presidio Main Post Update	Presidio (Area B)	Planning document	This update to the PTMP defines projects designed interpret the Presidio's history, including a new Archaeology Center. The Update includes more building space for public uses than identified in the PTMP. The update also includes the employment of green practices in historic building and landscape rehabilitation efforts and in ongoing maintenance.	http://www.presidio.gov/explore/Pages/main-post.aspx
Quartermaster Reach Project	Presidio (Area B)	Wetland restoration and creation	The project includes "daylighting" about 850 feet of stream currently in a subsurface culvert that discharges to Crissy Marsh. The project will provide an ecological corridor and pedestrian trail through Quartermaster Reach that will connect a recently restored 450-foot stretch of stream and native habitat to the south (known as Thompson Reach) to Crissy Field Tidal Marsh.	http://www.presidio.gov/about/Pages/quartermaster-reach-planning.aspx
Main Parade Ground Rehabilitation Project	Presidio (Area B)	Facilities improvements	The project consists of the rehabilitating the red brick buildings, which includes paving, grading, relocating utilities, and addressing drainage necessary for a relocated parking lot and a new lawn area.	Main Parade Ground Rehabilitation Presidio of San Francisco (Presidio Trust 2010)
Fort Point Retrofits	Fort Point	Facilities	Fort Point as well as many areas within the park is undergoing retrofits to improve accessibility.	http://www.nps.gov/goga/planyourvisit/fort-point-accessibility-public-comment.htm and http://www.nps.gov/fopo/faqs.htm
Baker Beach Landfill Remediation	Baker Beach	Remediation/restoration	Between August and November of 2007, 73,000 tons of debris were unearthed by spider excavators and conveyed 250 feet along treacherous slopes to the top of the cliffs. The Coastal Trail was also scheduled for restoration.	http://www.presidio.gov/nature/clean-up/projects.htm and http://www.nps.gov/goga/parknews/2009-1117.htm

Appendix K: Past, Present, and Future Projects and Actions Considered for the Cumulative Impacts Analysis

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San Francisco Veteran Affairs Long Range Development Plan	Fort Miley	Long-term management plan	A comprehensive plan to guide the future physical development of the San Francisco Veterans Affairs Medical Campus at Fort Miley. The center provides medical services for military veterans.	http://www.sanfrancisco.va.gov/docs/SFVAMC_LRDP.pdf
Construction of San Francisco Veterans Medical Center Research Facility	Fort Miley	Facilities construction	Construction of a new 7,600 square-foot building at the medical center.	http://www.sfpar.org/site/2009/05/index.html
Ocean Beach Master Plan	Ocean Beach	Land use plan	This plan presents recommendations for the management and protection of GGNRA lands, as well as City of San Francisco lands, in the corridor that stretches from Lands End to Lake Merced, and from the ocean to the lower Great Highway. These 3.5 miles of beach and rugged coastline include a national park, a popular urban open space, and is the site of a major infrastructure complex, and a beloved San Francisco landscape.	http://parkplanning.nps.gov/projectHome.cfm?parkID=303&projectId=40927
Construction of Fort Funston Restroom and Maintenance Facilities	Fort Funston	Facilities	The NPS is planning to construct a new restroom facility at Fort Funston. A 540 ft ² building would be constructed to provide flush toilets near the northeast corner of the parking lot. The chemical toilets located at the northwest end of the main parking lot would be removed. The new restroom building will be Americans with Disabilities Act accessible and an accessible path will be created to connect to the parking lot and the Sunset Trail.	http://parkplanning.nps.gov/projectHome.cfm?parkId=303&projectId=15201
Mori Point Restoration and Trail Plan	Mori Point, San Mateo County	Trail restoration	Project includes protecting and enhancing habitat for the SF garter snake and California red-legged frog at Mori Point; preserving and restoring habitat at Mori Point by reducing threats to native plant communities and natural processes; and developing a safe and sustainable trail system to improve recreational experiences and reduce impacts to park resources.	http://www.nps.gov/goga/parkmgmt/planning.htm

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Sharp Park Safety Infrastructure Improvement and Habitat Enhancement Project	Sharp Park, Pacifica	Infrastructure improvements and habitat enhancement	Sharp Park is a 417-acre multiple use facility owned and maintained SFRPD in Pacifica, CA. The park includes a wetland complex that is important habitat for the endangered and fully protected San Francisco garter snake and the California red-legged frog. This proposed project consists of improvements at two locations: the existing Horse Stable Pond pumphouse structure to enhance maintenance access and safety; the Laguna.Salada/Horse Stable Pond wetland complex to restore habitat in specific locations for protected species and remove impediments to water flow.	San Francisco Planning Department: Notification of Project Receiving Environmental Review
Pedro Point Headlands Stewardship Project	Pedro Point Headlands	Restoration	The Pedro Point Headland Stewardship Project has four primary goals: (1) maintain and improve the ecological status of Pedro Point Headlands during this interim management stage; (2) create a safe and enjoyable environment for interim recreational use of the property; (3) build a successful volunteer-based stewardship program with the local community that will be focused on a partnership with a local neighborhood organization, the Pedro Point Community Association; and (4) protect endangered/native species and educate Pedro Point Community Association / other volunteers on these projects. Under this work, the Pacifica Land Trust has removed invasive species, planted native species, maintained and improved trails, blocked motorcycle access, and monitored water flow at the site.	http://www.ccsf.edu/Departments/Biology/Center_for_Habitat_Restoration/pedropointinternships.html and http://coastsider.com/index.php/site/news/join_the_pedro_point_headlands_stewardship_teams_saturday/
Devil's Slide Tunnels Project	Pedro Point, Pacifica	Highway repair	Two inland tunnels will bypass Devil's Slide, in order to provide a safe, dependable highway between Pacifica and Montara.	http://www.dot.ca.gov/dist4/dslide/
Long-Term Park-Wide Projects				
GGNRA General Management Plan	Parkwide	Planning document	The GGNRA General Management Plan will provide for resource protection within the park.	
GGNRA Habitat Restoration Programs	Parkwide	Natural plant community restoration; invasive species removal	Park Resource Stewardship Programs including volunteer programs of the NPS, Golden Gate National Parks Conservancy, and Presidio Trust.	N/A
GGNRA Maintenance Operations	Parkwide	Various maintenance activities and projects	The maintenance division conducts many ongoing operations throughout GGNRA that may create cumulative impacts with other activities. Maintenance projects may include but are not limited to road, trail and stormwater system maintenance.	N/A

Appendix K: Past, Present, and Future Projects and Actions Considered for the Cumulative Impacts Analysis

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Trails Forever Program	Parkwide	Trail construction, restoration, and rehabilitation	The Trails Forever initiative renovates and expands park trails as necessary to build upon the existing trail system while protecting natural resources. Program assists in making GGNRA more welcoming and sustainable, and inspires stewardship. The initiative is sponsored by the Parks Conservancy, the NPS, and the Presidio Trust. The program has included invasive species removal, installation of kiosk and trail signs, restoration/enhancement of trailside habitat, creation of educational programs and scenic overlooks, completion of new trails, and repair/improve existing trails.	http://www.parksconservancy.org/our_work/trails/index.asp
NPS Inventory and Monitoring Program	Parkwide	Inventory and monitoring	The Inventory and Monitoring Program collects, organizes, and makes available natural resource data and contributes to the service's institutional knowledge by facilitating the transformation of data into information through analysis, synthesis, and modeling; includes an Early Detection of Invasive Plants Program.	http://science.nature.nps.gov/im/index.cfm
Recovery Plans for Listed Plant and Wildlife Species	Parkwide	Recovery plan	The general objectives of recovery plans include to protect, maintain, and enhance existing populations of the listed species, including San Bruno elfin, mission blue butterfly, northern spotted owl, western snowy plover, San Francisco garter snake, California red-legged frog, etc.	USFWS documents
The San Francisco Natural Areas Program	Parkwide	Habitat restoration, education project	This program restores and enhances remnant natural areas and develops and supports community-based stewardship of these areas	http://sfnap.org/
Wildland-Urban Interface Initiative	Parkwide	Fire protection	The Wildland-Urban Interface Initiative was authorized by Congress in 2001 in conjunction with the National Fire Plan. It provides funding to reduce hazardous fuels on federal lands and assist communities with wildland fire protection (NPS 2010j).	http://www.nps.gov/pore/parkmgmt/finremmanagement_wui.htm
Endangered Species Big Year	Parkwide	Educational project	Annual educational project comprised of several non-profit organizations to benefit of the endangered and threatened species found within GGNRA. Completed in 2008, this project provided long-term recovery assistance through conservation recovery actions to prevent listed species from going extinct.	http://www.nps.gov/goga/big_year.htm

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GGNRA Long Range Transportation Plan Update	Parkwide	Transportation	GGNRA has initiated work on a long-range transportation plan for the park that is consistent with U.S. Department of Transportation planning practices for states and metropolitan planning organizations. The process developed at GGNRA will be a model for future transportation planning efforts at park units throughout the NPS. GGNRA is developing the long-range transportation plan concurrently with an update to the 1980 GGNRA General Management Plan to better understand baseline transportation conditions and to inform the new general management plan's vision for transportation.	Plan scheduled for completion in 2008.
Ocean Park Stewardship Action Plan	Parkwide	Ecological restoration	Developed by NPS to increase the emphasis on restoring and conserving park marine and estuarine resources.	http://www.nature.nps.gov/water/Homepage/Ocean_Park_Stewardship.cfm
Pacific Ocean Parks Strategic Plan	Parkwide	Management and conservation	Focuses on management and conservation of marine resources and restoration of impacted resources.	http://www.nature.nps.gov/water/Marine/Pacific_Ocean_Parks_Strategic_Plan_April-2008.pdf
Golden Gate Park Asset Management Plan	Parkwide	Park management	Focuses on maintenance of park assets; informed the development of alternatives in the general management plan.	http://www.nps.gov/goga/parkmgmt/upload/goga2008_annual_rpt.pdf
Association of Bay Area Governments: Bay Trail Plan	Parkwide	Trail plan	Focuses on the development of a regional hiking and bicycling trail around the perimeter of San Francisco and San Pablo Bays and creating connections to existing park and recreation facilities in an environmentally sensitive manner.	http://baytrail.abag.ca.gov/baytrailplan.html
California Department of Parks and Recreation: California Outdoor Recreation Plan	Parkwide	Recreation	Provides guidance to all recreation providers, including federal parks, that provide outdoor recreational lands, facilities, and services in California.	http://www.parks.ca.gov/pages/795/files/2009-2014%20corp.pdf
Coastal Conservancy: California Coastal Trail	Parkwide	Trail completion	The project is to create network of public trails along the California coast for walkers, bikers, equestrians, wheelchair riders, and others.	http://scc.ca.gov/2010/01/07/the-california-coastal-trail/
Golden Lands, Golden Opportunity: Preserving vital Bay Area lands for all Californians	Parkwide	Land preservation	This initiative provides a statement of regional principles to ensure a healthy future for vital Bay Area lands and residents and identifies unprotected landscapes with significant value to the Bay Area and California.	http://www.greenbelt.org/downloads/resources/report_GoldenLands.pdf

Appendix K: Past, Present, and Future Projects and Actions Considered for the Cumulative Impacts Analysis

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Sea Level Rise Interpretive Exhibit	Crissy Field	Climate change	The sea level at Crissy Field has risen by 0.2 meters over the past 100 years, and predictions indicate that it will rise 0.5 to 1.6 meters more by 2100. These changes pose risks to coastal lowlands, beaches, and coastal bluffs. By 2100, the volume and effects of each annual flood may be the equivalent of today's 100-year flood.	http://www.nps.gov/goga/naturescience/upload/Crissy_SRL_Panel.pdf
Future Projects				
San Mateo Equestrian Plan	San Mateo County	Land use plan	This management plan will propose options for the future use of four San Mateo County stables located on GGNRA land and will address site and facility needs, improvements, and protection of important resources at and surrounding the sites. The plan will also identify and enhance the public outreach and equestrian programs, identify best management practices and sustainable programs, increase protection of natural resources, and preserve the cultural resources that surround the stables. Plan has been submitted for funding but no funding source is currently available.	
Southern Marin Equestrian Plan	Marin Headlands	Land use plan	This management plan will propose options for the future use of three Marin County stables located on GGNRA land and will address site and facility needs, improvements, and protection of important resources at and surrounding the sites. The plan will also identify and enhance the public outreach and equestrian programs, identify best management practices and sustainable programs, increase protection of natural resources, and preserve the cultural resources that surround the stables.	http://www.nps.gov/goga/parkmgmt/planning.htm
Trails Forever - Southern Marin Headlands project	Marin Headlands	Trail rehabilitation, replanting native vegetation	The southern Marin Headlands project initiated in the summer/fall of 2007 focused on enhancing the Coastal Trail corridor in the southern Marin Headlands and included removal of selected non-native trees that compromise the health of habitat used by the mission blue butterfly.	http://www.parksconservancy.org/assets/pdf/southern-marin-headlands-update.pdf
Battery Cavallo Preservation and Interpretation Plan	Fort Baker	Preservation plan	In a future planning effort with separate environmental analysis, the NPS would develop a detailed multidisciplinary plan for the preservation and interpretation of Battery Cavallo, integrating requirements for historic preservation, natural resource protection, visitor use, and interpretation. Project is mitigation for the Fort Baker Plan and EIS.	

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Trails Forever – Lands End	Lands End	Trail rehabilitation, replanting native vegetation	Recent work at Lands End included a new promenade and overlook, improvements to the Coastal Trail, and a revitalization of the surrounding forest. Future work includes resurfacing and stabilizing additional segments of the trail, rehabilitation of damaged social trails, improving visitor amenities, and engaging the community in park stewardship.	http://www.parksconservancy.org/our_work/trails/index.asp
Pedro Point Trails Plan	Pedro Point	Trails plan	This plan includes planning, preliminary design, and compliance for the California Coastal Trail through Pedro Point Headlands. This will include construction of the multi-use trail and way-finding, connection to an existing parking facility at the south end of Pedro Point, and connection to the trail network throughout the Pedro Point Headlands. Project to be initiated after Pedro Point is transferred to the NPS. Plan has been submitted for funding in the annual funding call.	
Rancho Corral de Tierra Trails Plan	Rancho Corral de Tierra	Trails plan	This plan will layout and define single-use and multi-use trails, access to regional trails, access to key points and views, trailhead locations, dog and horse access, and other needed elements found through the assessment of existing trails. This plan will also provide protection of natural resources, access to park, and concession or leased operations. The plan has been submitted for funding in the annual funding call.	
Regional Projects				
EIS Related to Experimental Removal of Barred Owls for the Conservation Benefit of Threatened Northern Spotted Owl	Regionwide	Conservation plan	The USFWS will gather information necessary to prepare an EIS for barred owl removal experiments designed to determine if the species' presence is affecting northern spotted owl population stability and growth, and to test the feasibility of removing barred owls from specific locations.	http://www.fws.gov/policy/library/2009/E9-29447.html
Gulf of the Farallones and Cordell Bank National Marine Sanctuaries: joint Climate Change Site Scenario	Regionwide	Climate change	To synthesize climate change impacts that will affect the local marine region and guide future policy development and management actions.	http://sanctuaries.noaa.gov/science/condition/cbnms/responses.html

Appendix K: Past, Present, and Future Projects and Actions Considered for the Cumulative Impacts Analysis

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Marin Countywide Plan	Regionwide	Land use plan	Land use on the portions of Marin County that are not owned by NPS is guided by the county's general plan, the Marin Countywide Plan (adopted 2007) and specifically addresses land use issues. Relevant goals of the plan include a preserved and restored natural environment, including the Marin watersheds, natural habitats, wildlife corridors, and open space that will be protected, restored, and enhanced as part of this plan.	
Marin County Unincorporated Area Bicycle and Pedestrian Plan	Regionwide	Transportation	The plan is the framework for the development of the bicycle and pedestrian network in the unincorporated areas of the county.	http://www.walkbikemarin.org/resource_library_policies.php
San Francisco Public Utilities Commission: Peninsula Watershed Management Plan	Regionwide	Watershed plan	The plan provides a comprehensive set of goals, policies, and management actions which integrate all watershed resources.	http://sfwater.org/mto_main.cfm/MC_ID/20/MSID/177/MTO_ID/349
Regional Bicycle Plan for the San Francisco Bay Area: 2009 Update	Regionwide	Transportation	A component of the Metropolitan Transportation Commission's effort to promote bicycling and bicycle safety.	http://www.mtc.ca.gov/planning/bicyclespedestrians/MTC_Regional_Bicycle_Plan_Update_FINAL.pdf
San Francisco General Plan	Regionwide	Management plan	The plan is a strategic and long-term document that serves as a basis for decisions that affect land use, circulation, housing, conservation, open space, noise, and safety.	http://www.sf-planning.org/ftp/General_Plan/index.htm
San Mateo County Comprehensive Bicycle Route Plan	Regionwide	Transportation	The plan addresses safety, access, quality of life, and the effective implementation of bikeways.	http://www.ccag.ca.gov/pdf/documents/archive/San%20Mateo%20County%20Comprehensive%20Bicycle%20Route%20Plan%202000.pdf
San Mateo County Trails Master Plan	Regionwide	Trail plan	Provides a plan for providing linkages to other trails and trail systems, adding additional trail routes or modifying existing routes, and trail policies and management.	http://www.co.sanmateo.ca.us/portal/site/parks
San Mateo Countywide Transportation Plan 2010	Regionwide	Transportation	Serves as a plan for all modes of transportation, advocates policy, strives for synergy among the parts of the transportation system, seeks optimal system development, and provides a means for coordinated decision-making.	http://www.co.sanmateo.ca.us/planning/pdf/ctp-exec_summary.pdf
Abbotts Lagoon Area Dune Restoration Plan	Point Reyes National Seashore	Dune restoration	Project will restore approximately 300 acres of coastal dune habitat south of Abbotts Lagoon to benefit listed species such as the Western Snowy Plover; invasive species will be removed (NPS 2010k).	http://www.nps.gov/pore/parkmgmt/planning_dunerestoration.htm

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Bolinas Lagoon Ecosystem Restoration Project	Bolinas Lagoon, Marin County	Ecosystem restoration	Preservation and restoration of the lagoon, including restoring function to the tidal estuary, which will benefit listed species such as the western snowy plover and California brown pelican.	http://farallones.noaa.gov/eco/bolinas/bolinas.html
Tennessee Valley / Manzanita Connector Trail Project	Tennessee Valley, Marin Headlands	Transportation	The goals of this San Francisco Bay Conservation and Development Commission Project are to upgrade the existing path to meet current American Disabilities Act accessibility and design standards for a multi-use pathway, and to encourage area residents to use the trail as an alternative to vehicular travel to reach key destinations such as shopping and transit facilities.	http://www.bcdc.ca.gov/meetings/commission/2010/01-07_2-09.pdf
FIRESafe Marin Projects - Marin City	Homestead Valley, Alta Avenue Fire Road, Oakwood Valley	Fire protection	The objective of Alta Fire Road Fuel Reduction, funded in fiscal year 2002, was to improve firefighting effectiveness along the Alta ridgeline by removing fire-prone exotic vegetation and improving emergency access along Alta Fire Road. Marin City borders immediately along GGNRA. More than 200 homes benefitted directly from the project and an estimated 300 additional homes see increased protection indirectly.	http://www.nps.gov/goga/parkmgmt/fire_marinproj_marin.htm
Headlands Institute Project	Marin Headlands	Environmental education	The Headlands Institute, an environmental education park partner with the GGNRA is proposing to build upon its educational programs by enhancing its Fort Cronkhite campus. The renovated campus will be a teaching model of stewardship and sustainable living with state-of-art learning facilities to match and make the most of the unique resources of the Marin Headlands.	
Ocean Beach Erosion Control Project	Ocean Beach	Erosion control	This project is developing long-term solutions to beach and bluff erosion problems at Ocean Beach along the Great Highway consistent with the enhancement of natural processes.	www.sfgov.org
Lake Merced Watershed Plan	Near Fort Funston	Watershed plan	The San Francisco Public Utilities Commission is currently developing a Lake Merced Watershed Plan that seeks to provide a comprehensive set of strategies to sustain the health of the Lake Merced watershed while providing recreational and educational opportunities. The resource management portion of the plan focuses on flora and fauna preservation restoration, enhancement of the watershed's natural areas, habitat values, and ecological function should benefit the bank swallow, which forages at Lake Merced.	http://sfwater.org/mto_main.cfm/MC_ID/20/MSD_ID/179/MTO_ID/672

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Vista Grande Drainage Basin Alternatives Analysis	Fort Funston	Watershed plan	<p>The purpose of the alternatives analysis is to develop and evaluate alternatives that will reduce or eliminate flooding, reduce erosion along Lake Merced, and provide other potential benefits such as habitat enhancement and lake level augmentation.</p> <p>The Vista Grande portion of Daly City's stormwater collection system drains the northwestern area of Daly City and an unincorporated portion of San Mateo County. This underground collection system routes storm flows northwest to Vista Grande canal and tunnel for discharge to an outfall structure at the beach below Fort Funston.</p>	http://www.ci.daly-city.ca.us/city_services/depts/public_works/pwnet/vistagrande_alts.html
Sharp Park Golf Course Restoration	Sharp Park, San Mateo County near Milagra Ridge, Mori Point, Sweeney Ridge/Cattle Hill, and Rancho Corral de Tierra	Site restoration plan	<p>The Sharp Park Golf Course, located in Pacifica in San Mateo County (adjacent to Mori Point) supports California red-legged frogs, which breed in a pond on the course as well as San Francisco garter snakes. The Endangered Species Compliance Plan for Sharp Park Golf Course will direct park operations and maintenance activities during the period before implementation of a comprehensive site restoration plan, which is intended to enhance habitat quality within the park for both the frog and the snake. Additionally, mitigation plans that are part of the Sharp Park restoration under the Significant Natural Resource Areas Management Plan include creating, restoring, and enhancing California red-legged frog and San Francisco garter snake habitat at the Laguna Salada wetland complex in the marsh area and associated uplands.</p>	http://www.sfgov.org/site/recpark_index.asp?id=113359 http://sfrecpark.org/SNRAMP.aspx http://sf-recpark.org/ftp/uploadedfiles/wcm_recpark/Planning/FinalCompliancePlan121809.pdf
Calera Parkway	Mori Point, Sweeney Ridge	Highway widening	<p>Improve traffic operations, decrease traffic congestion and delay, and improve peak-period travel time.</p> <p>The project proposes to widen State Route 1 from four lanes to six lanes (three through-lanes in each travel direction) in the City of Pacifica, County of San Mateo, California. The portion of State Route 1 proposed for widening extends from approximately 1,500 feet south of Fassler Avenue/Rockaway Beach Avenue to approximately 2,300 feet north of Reina Del Mar Avenue, a distance of 1.3 miles. The project includes improvements to the two intersections within the proposed project limits.</p>	http://www.smcta.com/Projects/Current_Projects/Route_1_Calera_Parkway.html

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Highway 1 Safety and Mobility Study	Pedro Point, Rancho Corral de Tierra	Transportation / highway improvement	San Mateo County and the Local Government Commission are conducting a participatory planning effort to improve Highway 1 safety and mobility between Half Moon Bay Airport and Devil's Slide. The highway passes sensitive coastline, communities with periods of high pedestrian and bicycle activity, and carries significant commuter and large tourist traffic volumes. With input from residents and stakeholders, a plan will be developed that responds to community needs.	County of San Mateo Planning and Building Department http://www.co.sanmateo.ca.us/portal/site/planning/menuitem.2ca7e1985b6c8f5565d293e5d17332a0/?vgnextoid=c16e7c06c7abe210VgnVCM1000001937230aRCRD&vgnnextchannel=a29e7c06c7abe210VgnVCM1000001937230aRCRD&applInstanceName=default
Midcoast Local Coastal Program	San Mateo County, Pacifica, near Rancho Corral de Tierra	Coastal Planning / Land Use	Commitment: Redesign urban environment to increase vitality and reduce congestion. Preserve and provide access to natural environment. Goals: Land use decisions consider transportation, infrastructure demand and environmental impacts. The boundary between open space and development is fixed to protect the quality of the natural environment.	http://www.co.sanmateo.ca.us/portal/site/planning/menuitem.2ca7e1985b6c8f5565d293e5d17332a0/?vgnextoid=2c056327a3a51210VgnVCM1000001d37230aRCRD&cpsextcurrchannel=1

APPENDIX L: AGENCY CONSULTATION

Letter on PEPC from Presidio Trust Asking to be Cooperator

Status: Reviewed	Park Correspondence Log:
Date Sent:	Date Received: 07/28/2005
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Letter
Notes:	

Correspondence Text

Dear Superintendent O'Neill:


By publication in the Federal Register of June 28, 2005, the Department of the Interior (DOI) gave public notice of its intention to establish the Negotiated Rulemaking Advisory Committee for Dog Management at Golden Gate National Recreation Area (the Committee). The purpose of the Committee is to negotiate and develop a special regulation (proposed rule) for dog management at Golden Gate National Recreation Area (GGNRA). Within the public notice, the DOI proposed 25 committee members including a representative from the Presidio Trust (Trust).

The Presidio Trust is a wholly-owned United States government corporation, chartered by Congress in the Presidio Trust Act, 16 U.S.C. Section 460bb appendix (enacted as P.L. 104-333). The Trust has administrative jurisdiction over Area B of the Presidio of San Francisco within the GGNRA. While appreciative of the DOI's offer to include the Trust on the Committee, by this letter the Trust respectfully withdraws from consideration as a member. However, the Trust does wish to participate in the concurrent NEPA process for dog management in GGNRA referred to at page 37109 of the public notice. Accordingly, we request to be involved as a cooperating agency under the National Environmental Policy Act and specifically 40 C.F.R. Section 1501.6 for the reasons set forth below.

Area A of the Presidio, which is under the jurisdiction of the National Park Service (NPS), is immediately adjacent to Area B. In light of this fact, the outcome of the NPS dog management rulemaking process has the potential for spillover impacts in Area B and, as noted in the GGNRA Dog Management Plan Draft Internal Scoping Report without citing Area B by name, "the potential to impact or influence policy at other regional parks—municipal, state, and federal." For these reasons the Presidio Trust intends to monitor closely the rulemaking process and will give future consideration to the Trust's regulation regarding pet management once the GGNRA rulemaking process is concluded.

Finally, for the record we note that the DOI public notice proposed the Presidio Trust as a committee member that would represent "the interests of local government." As a United States government agency, the Trust is charged with representing national interests, and any future reference to interests represented by the Trust should clearly so state. The Trust looks forward to working with you in the NEPA process for dog management. If there are further questions, I may be reached at 415 561 5419. Thank you very much.

Letter from the State of California Parks and Recreation

JUL-31-06 04:30pm From-PUBLIC SAFETY SECTION 9166537866 T-978 P.02/07 F-541
 State of California • The Resources Agency Arnold Schwarzenegger, Governor
DEPARTMENT OF PARKS AND RECREATION • P.O. Box 942896 • Sacramento, CA 94296-0001 Ruth Coleman, Director
(916) 653-0398

July 31, 2006

Mr. Brian O'Neill, General Superintendent
Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, California 94123

Dear Mr. O'Neill:

Your letter of invitation to Director Ruth Coleman regarding the Golden Gate National Recreation Area (GGNRA) Dog Management Plan/Draft Environmental Impact Statement (Draft EIS) has been referred to me for response. Thank you for requesting our participation in the August 1 interagency meeting and planning process for this project. The California Department of Parks and Recreation (California State Parks) welcomes the opportunity to provide comments ahead of the interagency meeting. Our understanding is that this meeting is for the National Park Service (NPS), as lead agency, to solicit input in the planning process for project purpose, need, objectives, the concurrent negotiating rulemaking process, and the schedule for Draft EIS preparation. The main purpose of the Dog Management Plan/Draft EIS is to determine where, and to what extent, leashed dog walking and unleashed walking under voice control will be permitted.

California State Parks is a state agency with jurisdiction and management of the State Park System as defined by California Public Resources Code (PRC) §5001 through 5001.5 and §5019.50. We are, therefore, responsible for the resources that may be affected by the Dog Management Plan/Draft EIS as those resources exist within units of the State Park System.

The mission of California State Parks is to provide for the health, inspiration, and education of the people of California by helping preserve the state's extraordinary biodiversity, protecting its most valued natural and cultural resources, and creating opportunities for high quality outdoor recreation. The 1.4 million-acre California State Park System for which we are responsible is currently made up of 278 classified units and major unclassified properties. Unit classifications, in addition to State Parks, include State Recreation Areas, State Beaches, State Historic Parks, State Vehicular Recreation Areas, State Reserves, Natural Preserves, Cultural Preserves, and State Wilderness. The management approach for any particular unit is based on the unit classification statutes as specified in PRC §5019.50 through 5019.74 and specific direction provided in each unit's general plan. The statutes set forth the primary purpose of each classified unit, identify in general what types of facilities and uses may be permitted, and provide direction on how unit resources shall be managed.

Jul-31-06 04:31pm From-PUBLIC SAFETY SECTION

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T-878 P 03/07 F-541

Mr. Brian O'Neill

-2-

July 31, 2006

By nature of their shared borders or close proximity with GGNRA, we have identified that resources, recreation uses, and park operations have the potential to be impacted in the following units. We request that NPS consider the management approach and operation requirements for these units, their resource values, and their recreational uses in development of the Dog Management Plan/Draft EIS:

- Mount Tamalpais State Park
- Samuel P. Taylor State Park
- Tomales Bay State Park
- Thornton State Beach

The information on the website does not clearly state that Samuel P. Taylor State Park and Tomales Bay State Park are decidedly outside of the project boundary. The map provided on the website simply states that GGNRA northern lands are managed by the Point Reyes National Seashore. We request that the website and Dog Management Plan/Draft EIS clearly show and state whether federal land adjacent to these two park units will be considered for study.

California State Parks recognizes the need of dogs and their owners to recreate together in safe, accessible, and aesthetic locations. Dog walking promotes exercise for both dogs and their owners, as well as pet socialization and owner interaction. Our concerns are that leashed and unleashed dog use should not contribute to natural or cultural resources damage, displace existing recreational activities, become a nuisance, or threaten public safety, especially in the vicinity of State Park System units. Nor should dog use affect units in a manner that conflicts with park classification, general plans, or other land-use planning documents. More detailed information about these concerns is provided in this letter.

UNIT CLASSIFICATIONS AND PLANNING DOCUMENTS

As described above, State Park System (SPS) units and subunits are managed according to their classification. The California PRC determines the general types of uses that may occur within each unit depending on its classification. SPS units are operated according to their individual general planning documents (PCR §5002.2). A general plan is a formal land-use planning document that provides broad policy and programmatic guidance regarding the development and management of an individual unit of the State Park System, including natural, cultural, scenic, aesthetic, and recreation values. The guidance from these planning documents is essential to California State Parks' managers and staff, and is of value to those organizations and individuals who have a substantial interest in the State Park System and its individual units. We request that direct, indirect, and cumulative impacts to SPS unit long-range planning, management, and development be considered by NPS. The Dog Management Plan/Draft EIS should also include analysis of any conflicts and proposed resolutions to impacts related to California State Parks planning documents.

Mr. Brian O'Neill

-3-

July 31, 2006

PARK OPERATIONS**Direct Control of Dogs**

In park areas that California State Parks allows dogs, the dogs must be under direct control of the visitor and cannot pose a threat to the public or park resources. California State Parks considers direct control to mean that a dog must be on a leash no longer than six feet (California Code of Regulations §4312). From an anecdotal point of view, many dog owners believe they have voice control over dogs when, in fact, they do not. A very small percentage of well-trained dog handlers with well-trained dogs are in fact able to maintain control without a leash. Therefore, California State Parks requests that NPS consider alternatives that reduce dog walking adjacent to State Park System units or minimize impacts by requiring dogs to be on-leash.

Potential Conflicts In Recreation

Dogs are known to chase horses and bicyclists particularly if a horseback rider or bicyclist is attempting to escape from a dog. Acting defensively, horses also may injure or kill dogs and put horseback riders and other visitors in danger. For example, panicked horses may throw their riders in an attempt to defend themselves or escape.

California State Parks, along with all other land management agencies that offer recreational sites, must comply with the American Disabilities Act (ADA). The ADA allows persons with disabilities to bring service dogs into areas where dogs may not otherwise be permitted. California State Parks provides guidance to departmental employees regarding ADA access with dogs, which is modeled upon that of NPS.

Dogs as a Nuisance or Threat to Visitors

In certain cases, park visitors have expressed that they are intimidated by large unleashed dogs on trails. This has been a common complaint in urban units like Topanga State Park. Although dogs are not permitted on trails in this and most other State Park System units, dog owners have been known to frequently bring unleashed dogs onto trails. As a result, hikers without dogs often have been surprised and frightened by large dogs running up to them. In parks with beaches, dogs running unleashed across the sand have run up on park visitors. On occasion visitors, particularly small children, have been knocked down. These persons are frequently frightened and/or injured by this type of event. In some cases, dogs may bite persons while playing, or attempting to play, with children or other persons not associated with a specific dog. Dogs will also protect other dogs and persons with whom they have regular interaction and property in a territorial response. On occasion a dog may perceive danger to its human handlers or property in its domain and react aggressively in an inappropriate manner.

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Mr. Brian O'Neill

-4-

July 31, 2006

In addition, State Park rangers have responded to dogfights that have resulted in injury to dogs. Dogfights have been known to occur when two groups of hikers or beach users with dogs off-leash encounter each other on trails or beaches. Lastly, dogs have also been known to urinate on beach visitors' beach equipment such as towels, toys, chairs, and ice chests and to defecate near persons using a beach area. This and other canine behaviors mentioned above have compromised the recreation experience of park visitors.

California State Parks works to provide safe, clean beaches for its visitors year-round. Another health and safety issue is the potential effect that large amounts of dog feces may have on the bacterial load in runoff and in nearby water sources. While there is no clear evidence that dog feces are the main causative agent for water quality degradation near California beaches, locally high concentrations of dog feces most certainly contributes to water quality issue in certain areas.

NATURAL RESOURCE MANAGEMENT

California State Parks strives to manage natural resources within its park units by, where possible, restoring and maintaining natural ecosystem processes. Domestic dogs are not native, but still exhibit predatory behavior reminiscent of their ancestors including sighting, vocalizing, tracking, and chasing of prey. Just by their very presence, dogs, even when leashed, look and smell like predators due to their similar appearance and behavior to wild canids. In addition, dogs often occur in higher density and frequency in parks than actual wild predators in natural settings. To this regard, the presence of leashed or unleashed dogs in, or adjacent to, units of the State Park System are likely to cause disturbance to wildlife and their habitat (Department Operations Manual §0311.5.7.1).

Specific Impacts to Wildlife and Vegetation

Domestic dogs have been known to pursue wildlife, resulting in their harassment, injury, or death (Department Operations Manual §0311.5.7.4). Dogs pose a threat to any wild species that spends at least some time on the ground, as well as to natural vegetation and wildlife habitat. Some specific ways that domestic dogs may impact wildlife and vegetation are as follows:

- Wild animals even if not being chased, may act threatened and remain vigilant; thus the very presence or scent of a dog, whether leashed or unleashed, has the potential to deter wild animals from their normal day-to-day activities such as foraging, resting, mating, and caring for young.
- When unleashed, dogs pursue, harass, and sometimes capture wild animals, thereby disrupting natural behaviors and processes. Not only will capture likely result in injury or death, but the chase may separate young from their parents and damage habitat, burrows, and nesting areas.

Mr. Brian O'Neill

-5-

July 31, 2006

- Natural, wild predator-prey relationships may be disrupted by the presence of dogs that are in or adjacent to the natural environment.
- Natural vegetation comprises much of the habitat used by wildlife in park units. While chasing wildlife or simply playing together off-leash, dogs have the potential to damage natural vegetation used by wildlife for foraging, cover, burrowing, and nesting. In addition, special-status plant species, wetlands, and other sensitive vegetation may be impacted by these disturbances.

We are particularly concerned about potential impacts to ground-nesting species, such as the federally threatened Western snowy plover. A nesting plover may be chased, or simply frightened to such an extent in the presence of a dog on the beach, that it accidentally damages its eggs or abandons its nest and chicks. In order to protect the Western snowy plover and its habitat on beaches of the State Park System, as well as to fulfill its legal obligation under the Federal Endangered Species Act, California State Parks currently implements an extensive protection, monitoring, and reporting program. We are concerned that overflow use or intrusion of dogs from GGNRA property onto beaches of or adjacent to State Park System units may jeopardize protective measures that we have employed. We request that NPS consider potential overflow use and intrusion in its planning efforts.

Impacts to Natural Resources by Dog Waste and Disease Transmission

Domestic dogs may carry and transmit disease and parasites to native canids, such as coyotes and foxes, during direct contact or contact with dog feces. In turn, domestic dogs may also contract disease and parasites from wild animals and through contact with their feces. In addition, locally concentrated areas of dog use may increase the likelihood or severity of water quality issues in those areas due to fecal run-off into nearby waterways and beaches. California State Parks requests that Dog Management Plan/Draft EIS provide a detailed plan on how NPS will prevent, manage, and mitigate the potential for disease transmission from domestic dogs to wildlife, as well as timely removal of locally concentrated waste in and in the vicinity of GGNRA properties.

CULTURAL RESOURCE MANAGEMENT

Dogs, especially when unleashed, playing, running, or digging have the potential to disturb, degrade, or damage archaeological sites, buried archaeological remains, historic structures or features, or sacred sites of significance to California State Parks and to the history of the State of California. We urge protection of archaeological and historical resources within, adjacent to, and in the vicinity of, State Park System units that may be pertinent to interpretation of cultural resource values. Protections, such as avoidance and minimization measures should be addressed in the Dog Management Plan/Draft EIS. If any new dog facilities will be constructed, we urge NPS to perform research and surveys prior to site-specific studies, and commit that any new facilities will be designed and constructed to avoid archaeological remains to the greatest extent practicable. If unavoidable, an appropriate recovery plan should be considered and if

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Mr. Brian O'Neill

-6-

July 31, 2006

remains are found during construction, work should be stopped for recordation, determinations, and development of a protection plan. In addition, all historical resources should be mapped, recorded, and evaluated to determine eligibility for placement on the National Register of Historic Places. Projects should be designed to avoid significant impacts to potentially eligible historic resources.

As the Dog Management Plan/Draft EIS proceed through the environmental review process, we anticipate that we will be able to further identify issues and possibly bring others to your attention. If any of our current comments need clarification or further explanation, please do not hesitate to contact me at (916) 653-0398 or rsede@parks.ca.gov.

Sincerely,



Randolph H. Sederquist, Chief
Public Safety Division

cc: Resources Agency
Richard Rayburn, Natural Resources Division

HW:RS:III:GGRRA Dog Mng

Letter from the National Park Service to the U.S. Fish and Wildlife Service



United States Department of the Interior

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

(IN REPLY REFER TO)

N16 (GOGA-SUPT)

OCT 20 2006

Ryan Olah
Chief, Coast Bay Delta Branch
Endangered Species Division
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

Dear Mr. Olah:

We appreciate the participation of your biologist, Kim Squires, at our August 1, 2006 agency scoping meeting for the Golden Gate National Recreation Area (GGNRA) Dog Management Plan/Environmental Impact Statement (EIS). It was especially helpful for our planning team to be able to meet with Kim in the afternoon following the scoping meeting to begin the informal consultation process for this project, which is proceeding concurrently with a negotiated rulemaking process for dog management. The negotiated rulemaking committee will work to develop consensus recommendations to the park about where it may be appropriate to allow dogwalking in GGNRA managed lands. The park intends to integrate the recommendations of the committee's efforts into one or more alternatives for analysis in the EIS.

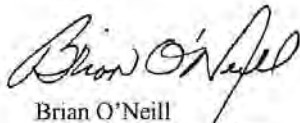
In this letter we are following up on Kim's suggestion that we continue the informal consultation process by enclosing for your review both 1) information on threatened and endangered species occurrence in the project area that we have gathered from the U.S. Fish and Wildlife Service website and from park data (highlighted species are those that would be the focus of our analysis); and 2) the parameters the park has developed to date for which park areas could be considered by the negotiated rulemaking for which types of dog activity. Additional information about the project can also be found by navigating to <http://parkplanning.nps.gov/goga> and selecting the project titled "EIS/Dog Management Plan for GGNRA." Project area maps can be accessed directly at the following website: <http://parkplanning.nps.gov/document.cfm?parkID=303&projectId=12791&documentID=15330>

In addition to those species highlighted in the enclosed county lists, we intend to also evaluate the impacts of dog management alternatives on the federally endangered California seablite (*Suaeda californica*) and Ohlone tiger beetle (*Cicindela ohlone*). The California seablite has been reintroduced to the marsh at Crissy Field that is managed by

GGNRA, and park staff believe that GGNRA sites in San Mateo County may support the Ohlone tiger beetle or suitable habitat.

As the NEPA and the negotiated rulemaking processes develop preliminary alternatives for dog management in different areas of the park we hope through informal consultation to work with the FWS to determine if adverse effects to listed species are present and to work together to avoid or minimize those effects. Please let us know who on your staff will be our contact for consultation on the dog management plan. The primary park contact for consultation will be Bill Merkle (415) 331-2894. However, in his absence during the month of October, please contact Daphne Hatch (415) 331-0744.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian O'Neill", written over a horizontal line.

Brian O'Neill
General Superintendent

Enclosures

Federal Endangered and Threatened Species that Occur in
or may be Affected by Projects in the Counties and/or
U.S.G.S. 7 1/2 Minute Quads you requested

Document Number: 061012050111
Database Last Updated: October 3, 2006

Species of Concern - The Sacramento Fish & Wildlife Office no longer maintains a list of species of concern. However, various other agencies and organizations maintain lists of at-risk species. These lists provide essential information for land management planning and conservation efforts. See www.fws.gov/sacramento/es/spp_concern.htm for more information and links to these sensitive species lists.

Red-Legged Frog Critical Habitat - The Service has designated final critical habitat for the California red-legged frog. The designation became final on May 15, 2006. See our [map index](#).

No quad species lists requested.

County Lists

Marin County

Listed Species

Invertebrates

Haliotes sorenseni

white abalone (E) (NMFS)

Icaricia icarioides missionensis

mission blue butterfly (E)

Incisalia mossii bayensis

San Bruno elfin butterfly (E)

Speyeria zerene myrtleae

Myrtle's silverspot butterfly (E)

Syncaris pacifica

California freshwater shrimp (E)

Fish

Eucyclogobius newberryi

tidewater goby (E)

Oncorhynchus kisutch

coho salmon - central CA coast (E) (NMFS)

Critical habitat, coho salmon - central CA coast (X) (NMFS)

Oncorhynchus mykiss

Central California Coastal steelhead (T) (NMFS)

Critical habitat, Central California coastal steelhead (X) (NMFS)

Critical habitat, Central Valley steelhead (X) (NMFS)

http://www.fws.gov/sacramento/es/spp_lists/auto_list.cfm

Oncorhynchus tshawytscha
Central Valley spring-run chinook salmon (T) (NMFS)
Critical habitat, winter-run chinook salmon (X) (NMFS)
winter-run chinook salmon, Sacramento River (E) (NMFS)

Amphibians

Ambystoma californiense
California tiger salamander, central population (T)

Rana aurora draytonii
California red-legged frog (T)
Critical habitat, California red-legged frog (X)

Reptiles

Caretta caretta
loggerhead turtle (T) (NMFS)

Chelonia mydas (incl. agassizi)
green turtle (T) (NMFS)

Dermochelys coriacea
leatherback turtle (E) (NMFS)

Lepidochelys olivacea
olive (=Pacific) ridley sea turtle (T) (NMFS)

Birds

Brachyramphus marmoratus
Critical habitat, marbled murrelet (X) marbled murrelet (T)

Charadrius alexandrinus nivosus
Critical habitat, western snowy plover (X)
western snowy plover (T)

Diomedea albatrus
short-tailed albatross (E)

Haliaeetus leucocephalus
bald eagle (T)

Pelecanus occidentalis californicus
California brown pelican (E)

Rallus longirostris obsoletus
California clapper rail (E)

Sternula antillarum (=Sterna, =albifrons) browni
California least tern (E)

Strix occidentalis caurina
northern spotted owl (T)

http://www.fws.gov/sacramento/es/spp_lists/auto_list.cfm

Mammals

Arctocephalus townsendi

Guadalupe fur seal (T) (NMFS)

Balaenoptera borealis

sei whale (E) (NMFS)

Balaenoptera musculus

blue whale (E) (NMFS)

Balaenoptera physalus

finback (=fin) whale (E) (NMFS)

Eubalaena glacialis

right whale (E) (NMFS)

Eumetopias jubatus

Critical Habitat, Steller (=northern) sea-lion (X) (NMFS)

Steller (=northern) sea-lion (T) (NMFS)

Megaptera novaeangliae

humpback whale (E) (NMFS)

Physeter catodon (=macrocephalus)

sperm whale (E) (NMFS)

Reithrodontomys raviventris

salt marsh harvest mouse (E)

Plants

Alopecurus aequalis var. *sonomensis*

Sonoma alopecurus (E)

Calochortus tiburonensis

Tiburon mariposa lily (T)

Castilleja affinis ssp. *neglecta*

Tiburon paintbrush (E)

Chorizanthe robusta var. *robusta*

robust spineflower (E)

Chorizanthe valida

Sonoma spineflower (E)

Delphinium bakeri

Baker's larkspur (E)

Critical habitat, Baker's larkspur (X)

Delphinium luteum

Critical habitat, yellow larkspur (X) yellow larkspur (E)

Hesperolinon congestum

Marin dwarf-flax (=western flax) (T)

Layia carnosa

beach layia (E)

Lupinus tidestromii
clover lupine [Tidestrom's lupine] (E)

Streptanthus niger
Tiburon jewelflower (E)

Trifolium amoenum
showy Indian clover (E)

Candidate Species

Invertebrates

Haliotes cracherodii
black abalone (C) (NMFS)

Fish

Oncorhynchus tshawytscha
Central Valley fall/late fall-run chinook salmon (C) (NMFS)
Critical habitat, Central Valley fall/late fall-run chinook (C) (NMFS)

San Francisco County

Listed Species

Invertebrates

Haliotes sorenseni
white abalone (E) (NMFS)

Icaricia icarioides missionensis
mission blue butterfly (E)

Incisalia mossii bayensis
San Bruno elfin butterfly (E)

Fish

Eucyclogobius newberryi
tidewater goby (E)

Oncorhynchus kisutch
coho salmon - central CA coast (E) (NMFS)

Oncorhynchus mykiss
Central California Coastal steelhead (T) (NMFS)
Critical habitat, Central California coastal steelhead (X) (NMFS)
Critical habitat, Central Valley steelhead (X) (NMFS)

Oncorhynchus tshawytscha
Critical habitat, winter-run chinook salmon (X) (NMFS)
winter-run chinook salmon, Sacramento River (E) (NMFS)

Amphibians

Rana aurora draytonii
California red-legged frog (T)

Reptiles

Caretta caretta
loggerhead turtle (T) (NMFS)

Chelonia mydas (incl. *agassizi*)
green turtle (T) (NMFS)

Dermochelys coriacea
leatherback turtle (E) (NMFS)

Lepidochelys olivacea
olive (=Pacific) ridley sea turtle (T) (NMFS)

Birds

Charadrius alexandrinus nivosus
western snowy plover (T)

Diomedea albatrus
short-tailed albatross (E)

Haliaeetus leucocephalus
bald eagle (T)

Pelecanus occidentalis californicus
California brown pelican (E)

Rallus longirostris obsoletus
California clapper rail (E)

Mammals

Arctocephalus townsendi
Guadalupe fur seal (T) (NMFS)

Balaenoptera borealis
sei whale (E) (NMFS)

Balaenoptera musculus
blue whale (E) (NMFS)
Balaenoptera physalus
finback (=fin) whale (E) (NMFS)

Eubalaena glacialis
right whale (E) (NMFS)

Eumetopias jubatus
Critical Habitat, Steller (=northern) sea-lion (X) (NMFS) Steller (=northern) sea-lion (T) (NMFS)

Megaptera novaeangliae
humpback whale (E) (NMFS)

Physeter catodon (= *macrocephalus*)
sperm whale (E) (NMFS)

Reithrodontomys raviventris
salt marsh harvest mouse (E)

Plants

Arctostaphylos hookeri ssp. *ravenii*
Presidio (=Raven's) manzanita (E)

Clarkia franciscana
Presidio clarkia (E)

Hesperolinon congestum
Marin dwarf-flax (=western flax) (T)

Lessingia germanorum
San Francisco lessingia (E)

Candidate Species

Invertebrates

Haliotes cracherodii
black abalone (C) (NMFS)

San Mateo County

Listed Species

Invertebrates

Euphydryas editha bayensis
bay checkerspot butterfly (T)
Critical habitat, bay checkerspot butterfly (X)

Haliotes sorenseni
white abalone (E) (NMFS)

Icaricia icarioides missionensis
mission blue butterfly (E)

Incisalia mossii bayensis
San Bruno elfin butterfly (E)

Speyeria callippe callippe
callippe silverspot butterfly (E)

Speyeria zerene myrtleae
Myrtle's silverspot butterfly (E)

Fish

Eucyclogobius newberryi
tidewater goby (E)

Oncorhynchus kisutch
coho salmon - central CA coast (E) (NMFS)
Critical habitat, coho salmon - central CA coast (X) (NMFS)

http://www.fws.gov/sacramento/es/spp_lists/auto_list.cfm

Oncorhynchus mykiss

Central California Coastal steelhead (T) (NMFS)

Critical habitat, Central California coastal steelhead (X) (NMFS)

Oncorhynchus tshawytscha

Central Valley spring-run chinook salmon (T) (NMFS)

winter-run chinook salmon, Sacramento River (E) (NMFS)

Amphibians

Ambystoma californiense

California tiger salamander, central population (T)

Rana aurora draytonii

California red-legged frog (T)

Critical habitat, California red-legged frog (X)

Reptiles

Caretta caretta

loggerhead turtle (T) (NMFS)

Chelonia mydas (incl. agassizi)

green turtle (T) (NMFS)

Dermochelys coriacea

leatherback turtle (E) (NMFS)

Lepidochelys olivacea

olive (=Pacific) ridley sea turtle (T) (NMFS)

Thamnophis sirtalis tetrataenia

San Francisco garter snake (E)

Birds

Brachyramphus marmoratus

Critical habitat, marbled murrelet (X) marbled murrelet (T)

Charadrius alexandrinus nivosus

Critical habitat, western snowy plover (X)

western snowy plover (T)

Diomedea albatrus

short-tailed albatross (E)

Haliaeetus leucocephalus

bald eagle (T)

Pelecanus occidentalis californicus

California brown pelican (E)

Rallus longirostris obsoletus

California clapper rail (E)

Sterna antillarum (=Sterna, =albifrons) browni

California least tern (E)

http://www.fws.gov/sacramento/es/spp_lists/auto_list.cfm

Mammals

Arctocephalus townsendi

Guadalupe fur seal (T) (NMFS)

Balaenoptera borealis

sei whale (E) (NMFS)

Balaenoptera musculus

blue whale (E) (NMFS)

Balaenoptera physalus

finback (=fin) whale (E) (NMFS)

Enhydra lutris nereis

southern sea otter (T)

Eubalaena glacialis

right whale (E) (NMFS)

Eumetopias jubatus

Steller (=northern) sea-lion (T) (NMFS)

Megaptera novaeangliae

humpback whale (E) (NMFS)

Physeter catodon (=macrocephalus)

sperm whale (E) (NMFS)

Reithrodontomys raviventris

salt marsh harvest mouse (E)

Plants

Acanthomintha duttonii

San Mateo thornmint (E)

Cirsium fontinale var. *fontinale*

fountain thistle (E)

Cupressus abramsiana

Santa Cruz cypress (E)

Eriophyllum latilobum

San Mateo woolly sunflower (E)

Hesperolinon congestum

Marin dwarf-flax (=western flax) (T)

Lessingia germanorum

San Francisco lessingia (E)

Pentachaeta bellidiflora

white-rayed pentachaeta (E)

Potentilla hickmanii

Hickman's potentilla (=cinquefoil) (E)

Candidate Species

Invertebrates

Haliotes cracherodii

black abalone (C) (NMFS)

Fish

Oncorhynchus tshawytscha

Central Valley fall/late fall-run chinook salmon (C) (NMFS)

Critical habitat, Central Valley fall/late fall-run chinook (C) (NMFS)

Key:

(E) *Endangered* - Listed as being in danger of extinction.

(T) *Threatened* - Listed as likely to become endangered within the foreseeable future.

(P) *Proposed* - Officially proposed in the Federal Register for listing as endangered or threatened.

(NMFS) Species under the Jurisdiction of the National Oceanic & Atmospheric Administration Fisheries Service. Consult with them directly about these species.

Critical Habitat - Area essential to the conservation of a species.

(PX) *Proposed Critical Habitat* - The species is already listed. Critical habitat is being proposed for it.

(C) *Candidate* - Candidate to become a proposed species.

(V) *Vacated* by a court order. Not currently in effect. Being reviewed by the Service.

(X) *Critical Habitat* designated for this species

Important Information About Your Species List

How We Make Species Lists

We store information about endangered and threatened species lists by U.S. Geological Survey 7½ minute quads. The United States is divided into these quads, which are about the size of San Francisco.

The animals on your species list are ones that occur within, **or may be affected by** projects within, the quads covered by the list. z Fish and other aquatic species appear on your list if they are in the same watershed as your quad or if water use in your quad might affect them.

z Amphibians will be on the list for a quad or county if pesticides applied in that area may be carried to their habitat by air currents.

z Birds are shown regardless of whether they are resident or migratory. Relevant birds on the county list should be considered regardless of whether they appear on a quad list.

Plants

Any plants on your list are ones that have actually been observed in the area covered by the list. Plants may exist in an area without ever having been detected there. You can find out what's in the nine surrounding quads through the California Native Plant Society's online Inventory of Rare and Endangered Plants.

Surveying

Some of the species on your list may not be affected by your project. A trained biologist or botanist, familiar with the habitat requirements of the species on your list, should determine whether they or habitats suitable for them may be affected by your project. We recommend that your surveys include any proposed and candidate species on your list.

For plant surveys, we recommend using the [Guidelines for Conducting and Reporting Botanical Inventories](#). The results of your surveys should be published in any environmental documents prepared for your project.

Your Responsibilities Under the Endangered Species Act

All animals identified as listed above are fully protected under the Endangered Species Act of 1973, amended. Section 9 of the Act and its implementing regulations prohibit the take of a federally listed wildlife species. Take is defined by the Act as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect" any such animal.

Take may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or shelter (50 CFR §17.3).

Take incidental to an otherwise lawful activity may be authorized by one of two procedures:

- 2 If a Federal agency is involved with the permitting, funding, or carrying out of a project that may result in take, then that agency must engage in a formal [consultation](#) with the Service.

During formal consultation, the Federal agency, the applicant and the Service work together to avoid or minimize the impact on listed species and their habitat. Such consultation would result in a biological opinion by the Service addressing the anticipated effect of the project on listed proposed species. The opinion may authorize a limited level of incidental take.

- 2 If no Federal agency is involved with the project, and federally listed species may be taken as part of the project, then you, the applicant, should apply for an incidental take permit. The Service may issue such a permit if you submit a satisfactory conservation plan for the species that would be affected by your project.

Should your survey determine that federally listed or proposed species occur in the area and are likely to be affected by the project, we recommend that you work with this office and the California Department of Fish and Game to develop a plan that minimizes the project's direct and indirect impacts to listed species and compensates for project-related loss of habitat. You should include the plan in any environmental documents you file.

Critical Habitat

When a species is listed as endangered or threatened, areas of habitat considered essential to its conservation may be designated as critical habitat. These areas may require special management considerations or protection. They provide needed space for growth and normal behavior; food, water, air, light, other nutritional or physiological requirements; cover or shelter; and sites for breeding, reproduction, rearing of offspring, germination or seed dispersal.

Although critical habitat may be designated on private or State lands, activities on these lands are not restricted unless there is Federal involvement in the activities or direct harm to listed wildlife.

If any species has proposed or designated critical habitat within a quad, there will be a separate line for this on the species list. Boundary descriptions of the critical habitat may be found in the Federal Register. The information is also reprinted in the Code of Federal Regulations (50 CFR 17.95). See the [critical habitat page](#) for maps.

Candidate Species

We recommend that you address impacts to candidate species. We put plants and animals on our candidate list when we have enough scientific information to eventually propose them for listing as threatened or endangered. By considering these species early in your planning process you may be able to avoid the problems that could develop if one of these candidates was listed before the end of your project.

Wetlands

If your project will impact wetlands, riparian habitat, or other jurisdictional waters as defined by section 404 of the Clean Water Act and/or section 10 of the Rivers and Harbors Act, you will need to obtain a permit from the U.S. Army Corps of Engineers. Impacts to wetland habitats require site specific mitigation and monitoring. For questions regarding wetlands, please contact Mark Littlefield in this office at (916) 414-6580.

Updates

Our database is constantly updated as species are proposed, listed and delisted. If you address proposed and candidate species in your planning, this should not be a problem. However, we recommend that you get an updated list every 90 days. That would be January 10, 2007.

Marin Municipal Water District Agency Scoping Response

Marin Municipal Water District Agency Scoping response
From: Shirwin_Smith@nps.gov
Sent: Friday, October 03, 2008 2:11 PM
To: Boltz, Suzanne; Layfield, Tracy
Subject: Marin Municipal Water District Agency Scoping response

----- Forwarded by Shirwin Smith/GOGA/NPS on 10/03/2008 11:10 AM -----

"Casey May"
<cmay@marinwater.org>
<Shirwin_Smith@nps.gov>
To:
cc:
Subject: Re: Agency Scoping
Mtg 8/1
08/07/2006 11:20
AM MST

Shirwin:
As we discussed last week, I would like to have the text revised in the Deliberative Draft regarding Adjacent Land Use specifically related to MMWD land, that was distributed at the meeting on 8/1/06. On page 3, in reference to MMWD land use, the text beginning with the first sentence should read: This district owns and manages about 20,000 acres of watershed land open sunrise to sunset for passive recreation, including access to seven reservoirs and 134 miles of roads and designated hiking trails. At this time the district has no plans to acquire additional lands to enlarge its system...

As I mentioned to you last week, it was a pleasure getting together with you and all the other agency representatives attending the scoping meeting. Brian's presentation regarding the historical perspective of the Negotiated Rule Making process and how it applies to GGNRA's Dog Management Plan was very informative. The effort you, Chris Powell and the consultants put into preparing for the meeting was quite evident.

Good luck with the entire process.

Regards
Casey

Casey May
Superintendent of Watershed Resources
Marin Municipal Water District
Sky Oaks Watershed Headquarters
P.O. Box 865
Fairfax, CA 94978
(415) 945-1179
cmay@marinwater.org

Letter from Marin County Parks and Open Space Commission to Golden Gate National Recreation Area

August 10, 2006

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

RECEIVED
AUG 14 2006
SUPERINTENDENT'S OFFICE

B. O'Neill
Cc: M. Barthling
C. Powell
L. Smith

Attn: Dog Management Plan/EIS

Dear Superintendent O'Neill:

I have two suggestions regarding the possible decision to allow dogs within the boundary of the GGNRA: DON'T DO IT.

If the final decision does allow dogs within the GGNRA, I strongly advise you to restrict the dogs to LEASH ONLY – NO EXCEPTIONS.

I have been a member of the Marin County Parks and Open Space Commission for almost ten years. Approximately five years ago, due to the out of control situation with dogs off leash in the County's open space lands, the commission was forced to review and write new policy in order to confront the growing problem.

During the commission's public hearings several dog owners and professional dog walkers demonstrated a complete lack of objectivity and were shockingly rude and insulting to anyone who dared express opposition to allowing dogs to run free in our "protected" open space. The *entitled* attitude of the dog owner/guardian was a real eye opener for many of us who were seeking a fair resolution to the dog problem.

You will discover that there is no middle ground with many dog owners. They will simply ignore any rules that may be imposed on the dog's ability to demonstrate its "dogness."

There are dozens of dog parks located throughout the Bay Area. More are being constructed. These parks fill the obvious need for dogs to exercise and interact with other dogs. Our national parks and recreation areas are no place for free roaming dogs. The impacts to the natural ecosystems are obvious and well documented.

Please do not be intimidated or dissuaded from resolutely protecting the natural resources found within the GGNRA. In other words: Hang Tough.

Sincerely



Rick Fraites, Chair
Marin County Parks and Open Space Commission*
50 Forrest Road
Novato, Ca 94947
415-717-4350
ricfraites@aol.com

*identification purposes only

Letter from the National Park Service to the U.S. Fish and Wildlife Service



United States Department of the Interior

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

IN REPLY REFER TO:

L76 (GOGA-NRM)

DEC 15 2010

Jan Knight, Section 7 Coordinator
United States Fish and Wildlife Service
Sacramento Office,
2800 Cottage Way, Suite W-2605
Sacramento, California 95825

Re: Section 7 Consultation for the Draft Dog Management Plan and Environmental
Impact Statement, Golden Gate National Recreation Area

Dear Ms. Knight:

The National Park Service (NPS) has developed a dog management plan/Environmental Impact Statement (plan/EIS) for Golden Gate National Recreation Area (GGNRA). The purpose of this letter is to acquaint you with the proposed plan/EIS and to request concurrence with our analysis of potential impacts on rare, threatened and endangered species that may be affected by the proposed action. The dog management alternatives addressed in this plan/EIS include 21 locations within GGNRA (see attached Figure 1). The selection of sites addressed in this plan/EIS was determined by NPS managers, and was based on information from historical and current dog management in GGNRA, including the 1979 Pet Policy; NPS law, policy, and regulations; park resources; and the Federal Panel Recommendations to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. This plan/EIS will only address lands directly managed by GGNRA and certain additional lands that will be directly managed by the park in the near future. The plan/EIS also provides a framework and criteria for the treatment of future new lands as they are acquired.

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

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

A plan/EIS is needed because GGNRA resources and values, as defined by the park's enabling legislation and the NPS Organic Act, could be compromised to the extent that, without action, those resources and values in some areas of the park might not be available for enjoyment by future generations. Additionally, a dog management policy inconsistent with NPS regulations and increased public expectations for use of the park for dog recreation have resulted in controversy, litigation, and compromised visitor and employee safety, affecting visitor experience

and resulting in resource degradation. The conflicts will likely escalate if not addressed in a comprehensive plan/EIS.

The internal scoping process yielded the following specific natural resource objectives for this planning process:

- Protect native wildlife and their habitat (including sensitive species and their habitat, and federally or state listed, unique, or rare species) from detrimental effects of dog use, including harassment or disturbance by dogs.
- Minimize degradation of soil and water resources by dog use.
- Preserve opportunities for future natural resource restoration and enhancement.

The Code of Federal Regulations, Title 36, Volume 1 provides “for the proper use, management, government, and protection of persons, property, and natural and cultural resources within areas under the jurisdiction of the NPS.” Several components of this regulation are relevant to the protection of natural resources and are listed in the table below.

Protected Natural Resources	Regulation
Vegetation Damage	36 CFR 2.1 (a) (1) (ii)
Wildlife Disturbance	36 CFR 2.2(a)(2)
Disturbance to T&E Species	36 CFR 2.2 (a) (2), 50 CFR Part 17
Violation of Areas Closed to All (T/E and Sensitive Habitat)	36 CFR 1.5 (f)
Pet Excrement	36 CFR 2.15 (a) (5)

Habitat used by federally threatened or endangered species may be vulnerable to impacts from intensive use of public areas by humans and dogs. GGNRA contains more federally protected endangered and threatened species than any other unit of the national park system in continental North America. There are over 80 rare or special-status wildlife species currently identified as permanent or seasonal residents of the park or dependent on park lands and waters for migration. Although habitats at GGNRA support many species with special status, only those species potentially affected by this plan/EIS are discussed in this document. Of the 80 listed wildlife species, 12 are state and/or federally listed and have a detailed impacts analysis in this plan/EIS. A list of the twelve species is attached to this letter.

In our preparation of the plan/EIS, we have analyzed the potential impacts of six alternatives including a No Action and a Preferred Alternative on listed aquatic and marine species occurring and potentially present within the 21 sites and new lands of GGNRA selected for dog management. Because the draft plan/EIS is a very large document we have attached excerpted applicable sections of the draft plan/EIS to assist with your review. These sections provide a

description of the preferred alternative and impact analysis for rare, threatened and endangered species and any designated critical habitat that are present or may potentially be present.

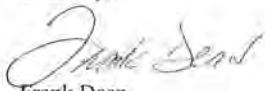
NPS recognizes that the public may not comply with the preferred alternative as described. To ensure resources, visitors and park staff are protected and that compliance with the CFR applicable to dog management is high, NPS has included a compliance-based management plan. If non-compliance occurs at a site, compliance-based management plan would be implemented to increase compliance with the new dog management regulations. Noncompliance would include dog walking within restricted areas, dog walking under voice and sight control in designated on-leash dog walking areas, and dog walking under voice and sight control outside of established ROLAs. When noncompliance is observed in an area, park staff would focus on enforcing the regulations, educating dog walkers, and establishing buffer zones, time and use restrictions, and SUP restrictions. If noncompliance continues and falls below 75 percent compliance in a management zone (measured as the percentage of total dogs / dog walkers observed during the previous 12 months not in compliance with the regulations), the area's management would be changed to the next more restrictive level of dog management. Impacts from noncompliance could reach short-term adverse, but the compliance-based strategy is designed to return impacts to a level that assumes compliance, as described in the overall impacts analysis, or provide beneficial impacts where dog walking is reduced or eliminated.

We have concluded that the preferred alternative for the selected 21 sites of GGNRA is "not likely to adversely affect" the species listed on the accompanying table. Therefore, we do not believe that formal consultation is required. Please tell us in writing within 60 days from the date of receipt, or no later than February 21, 2011, if you do or do not concur with our assessment.

If, based on comments received during public review of the DEIS, NPS determines that the preferred alternative should be altered or amended in any way, NPS will submit a revised analysis with a new recommendation based on the new preferred alternative and associated impacts.

Should you need to informally discuss concerns before making your determination, please contact Daphne Hatch, Chief of Natural Resources and Management, at 415 331-0744.

Sincerely,



Frank Dean
General Superintendent

Enclosures



FEDERALLY AND STATE-LISTED SPECIES CONSIDERED IN THIS PLAN/EIS

Group	Scientific Name	Common Name	Federal Status ^a	State Status ^a	GGNRA Location
Invertebrate	<i>Callophrys mossii bayensis</i>	San Bruno elfin butterfly	FE	—	Milagra Ridge
Invertebrate	<i>Icaricia icarioides</i> ssp. <i>missionensis</i>	Mission blue butterfly	FE	—	Marin Headlands Trails, Oakwood Valley, Milagra Ridge, Sweeney Ridge, Fort Baker
Fish	<i>Eucyclogobius newberryi</i>	Tidewater goby	FE, CH	—	Marin Headlands (Rodeo Lagoon)
Fish	<i>Oncorhynchus kisutch</i>	Coho salmon—central California coast	FE, CH	SE	Muir Beach (Redwood Creek)
Fish	<i>Oncorhynchus mykiss</i>	Steelhead—central California coast	FT, CH	—	Muir Beach (Redwood Creek)
Amphibian	<i>Rana aurora draytonii</i>	California red-legged frog	FT, CH	—	Marin Headlands (Tennessee Valley Pond), Muir Beach (lagoon), Rodeo Beach (lagoon and lake), Mori Point, Milagra Ridge, Sweeney Ridge
Reptile	<i>Thamnophis sirtalis tetrataenia</i>	San Francisco garter snake	FE	SE	Mori Point, Milagra Ridge, Sweeney Ridge, Pedro Point
Bird	<i>Charadrius alexandrinus nivosus</i>	Western snowy plover	FT, CH ^b	—	Crissy Field, Ocean Beach
Bird	<i>Riparia riparia</i>	Bank swallow	—	ST	Fort Funston
Bird	<i>Strix occidentalis caurina</i>	Northern spotted owl	FT	—	Homestead Valley, Oakwood Valley
Mammal	<i>Arctocephalus townsendi</i>	Guadalupe fur seal	FT	ST	All beach areas
Mammal	<i>Eumetopias jubatus</i>	Steller sea lion	FT, CH ^b	—	All beach areas
Plant	<i>Arctostaphylos hookeri</i> ssp. <i>ravenii</i>	Presidio (Raven's) Manzanita	FE	SE	Baker Beach
Plant	<i>Hesperolinon congestum</i>	Marin dwarf-flax (Marin western flax)	FT	ST	Baker Beach
Plant	<i>Lessingia germanorum</i>	San Francisco lessingia	FE	SE	Fort Funston, Baker Beach
Plant	<i>Suaeda californica</i>	California seablite	FE	—	Crissy Field
Plant	<i>Potentilla hickmanii</i>	Hickman's potentilla (Hickman's cinquefoil)	FE	SE	Mori Point, Pedro Point

^aFE = federally endangered, FT = federally threatened, CH = critical habitat, SE = state endangered, ST = state threatened, SR = state rare.

^b Critical habitat has been designated for this species, but it does not occur in GGNRA.

Letter from the National Park Service to the National Oceanic and Atmospheric



United States Department of the Interior

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

IN REPLY REFER TO:
L76 (GOGA-NRM)

DEC 15 2010

Mr. Dan Butler
NOAA - Fisheries
Southwest Region,
501 W. Ocean Blvd., Suite 4200
Long Beach, California 90802

Re: Section 7 Consultation for the Draft Dog Management Plan and Environmental
Impact Statement, Golden Gate National Recreation Area

Dear Mr. Butler:

The National Park Service (NPS) has developed a dog management plan/Environmental Impact Statement (plan/EIS) for Golden Gate National Recreation Area (GGNRA). The purpose of this letter is to acquaint you with the proposed plan/EIS and to request concurrence with our analysis of potential impacts on rare, threatened and endangered species that may be affected by the proposed action. The dog management alternatives addressed in this plan/EIS include 21 locations within GGNRA (see attached Figure 1). The selection of sites addressed in this plan/EIS was determined by NPS managers, and was based on information from historical and current dog management in GGNRA, including the 1979 Pet Policy; NPS law, policy, and regulations; park resources; and the Federal Panel Recommendations to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. This plan/EIS will only address lands directly managed by GGNRA and certain additional lands that will be directly managed by the park in the near future. The plan/EIS also provides a framework and criteria for the treatment of future new lands as they are acquired.

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and resulting in resource degradation. The conflicts will likely escalate if not addressed in a comprehensive plan/EIS.

The internal scoping process yielded the following specific natural resource objectives for this planning process:

- Protect native wildlife and their habitat (including sensitive species and their habitat, and federally or state listed, unique, or rare species) from detrimental effects of dog use, including harassment or disturbance by dogs.
- Minimize degradation of soil and water resources by dog use.
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The Code of Federal Regulations, Title 36, Volume 1 provides “for the proper use, management, government, and protection of persons, property, and natural and cultural resources within areas under the jurisdiction of the NPS.” Several components of this regulation are relevant to the protection of natural resources and are listed in the table below.

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Pet Excrement	36 CFR 2.15 (a) (5)

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Freshwater, brackish-water, and marine environments in GGNRA are habitat for the two listed salmonids, coho salmon (federally endangered and state endangered) and steelhead trout (federally threatened). As previously noted, salmonids are visual feeders, and extended periods of high turbidity following dog play in tidal areas or creeks can result in reduced foraging time or success for these species. No areas designated as essential fish habitat will be affected.

In our preparation of the plan/EIS, we have analyzed the potential impacts of six alternatives including a No Action and a Preferred Alternative on listed aquatic and marine species occurring and potentially present within the 21 sites and new lands of GGNRA selected for dog management. Because the draft plan/EIS is a very large document we have attached excerpted applicable sections of the draft plan/EIS to assist with your review. These sections provide a description of the preferred alternative and the impact analysis for rare, threatened and endangered species and any designated critical habitat that are present or may potentially be present.

NPS recognizes that the public may not comply with the preferred alternative as described. To ensure resources, visitors and park staff are protected and that compliance with the CFR applicable to dog management is high, NPS has included a compliance-based management plan. If non-compliance occurs at a site, compliance-based management plan would be implemented to increase compliance with the new dog management regulations. Noncompliance would include dog walking within restricted areas, dog walking under voice and sight control in designated on-leash dog walking areas, and dog walking under voice and sight control outside of established ROLAs. When noncompliance is observed in an area, park staff would focus on enforcing the regulations, educating dog walkers, and establishing buffer zones, time and use restrictions, and SUP restrictions. If noncompliance continues and falls below 75 percent compliance in a management zone (measured as the percentage of total dogs / dog walkers observed during the previous 12 months not in compliance with the regulations), the area's management would be changed to the next more restrictive level of dog management. Impacts from noncompliance could reach short-term adverse, but the compliance-based strategy is designed to return impacts to a level that assumes compliance, as described in the overall impacts analysis, or provide beneficial impacts where dog walking is reduced or eliminated.

We have concluded that the preferred alternative for the selected 21 sites of GGNRA is "not likely to adversely affect" the coho salmon or steelhead trout. Therefore, we do not believe that formal consultation is required. Please tell us in writing within 60 days from the date of receipt, or no later than February 21, 2011, if you do or do not concur with our assessment.

If, based on comments received during public review of the DEIS, NPS determines that the preferred alternative should be altered or amended in any way, NPS will submit a revised analysis with a new recommendation based on the new preferred alternative and associated impacts.

Should you need to informally discuss concerns before making your determination, please contact Daphne Hatch, Chief of Natural Resources and Management, at 415 331-0744.

Sincerely,



Frank Dean
General Superintendent

Enclosures



Letter from the National Park Service to the National Oceanic and Atmospheric Administration



United States Department of the Interior

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

IN REPLY REFER TO
L76 (GOGA-NRM)

DEC 15 2010

Ms. Nan Reck
NOAA - Fisheries
777 Sonoma Ave., Suite 325,
Santa Rosa, California 95404

Re: Section 7 Consultation for the Draft Dog Management Plan and Environmental Impact Statement, Golden Gate National Recreation Area

Dear Ms. Reck:

The National Park Service (NPS) has developed a dog management plan/Environmental Impact Statement (plan/EIS) for Golden Gate National Recreation Area (GGNRA). The purpose of this letter is to acquaint you with the proposed plan/EIS and to request concurrence with our analysis of potential impacts on rare, threatened and endangered species that may be affected by the proposed action. The dog management alternatives addressed in this plan/EIS include 21 locations within GGNRA (see attached Figure 1). The selection of sites addressed in this plan/EIS was determined by NPS managers, and was based on information from historical and current dog management in GGNRA, including the 1979 Pet Policy; NPS law, policy, and regulations; park resources; and the Federal Panel Recommendations to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. This plan/EIS will only address lands directly managed by GGNRA and certain additional lands that will be directly managed by the park in the near future. The plan/EIS also provides a framework and criteria for the treatment of future new lands as they are acquired.

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

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

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

The internal scoping process yielded the following specific natural resource objectives for this planning process:

- Protect native wildlife and their habitat (including sensitive species and their habitat, and federally or state listed, unique, or rare species) from detrimental effects of dog use, including harassment or disturbance by dogs.
- Minimize degradation of soil and water resources by dog use.
- Preserve opportunities for future natural resource restoration and enhancement.

The Code of Federal Regulations, Title 36, Volume 1 provides “for the proper use, management, government, and protection of persons, property, and natural and cultural resources within areas under the jurisdiction of the NPS.” Several components of this regulation are relevant to the protection of natural resources and are listed in the table below.

Protected Natural Resources	Regulation
Vegetation Damage	36 CFR 2.1 (a) (1) (ii)
Wildlife Disturbance	36 CFR 2.2(a)(2)
Disturbance to T&E Species	36 CFR 2.2 (a) (2), 50 CFR Part 17
Violation of Areas Closed to All (T/E and Sensitive Habitat)	36 CFR 1.5 (f)
Pet Excrement	36 CFR 2.15 (a) (5)

Habitat used by federally threatened or endangered species may be vulnerable to impacts from intensive use of public areas by humans and dogs. GGNRA contains more federally protected endangered and threatened species than any other unit of the national park system in continental North America. There are over 80 rare or special-status wildlife species currently identified as permanent or seasonal residents of the park or dependent on park lands and waters for migration. Although habitats at GGNRA support many species with special status, only those species potentially affected by this plan/EIS are discussed in this document. Of the 80 listed wildlife species, 12 are state and/or federally listed and have a detailed impacts analysis in this plan/EIS.

Freshwater, brackish-water, and marine environments in GGNRA are habitat for the two listed salmonids, coho salmon (federally endangered and state endangered) and steelhead trout (federally threatened). As previously noted, salmonids are visual feeders, and extended periods of high turbidity following dog play in tidal areas or creeks can result in reduced foraging time or success for these species. No areas designated as essential fish habitat will be affected.

In our preparation of the plan/EIS, we have analyzed the potential impacts of six alternatives including a No Action and a Preferred Alternative on listed aquatic and marine species occurring and potentially present within the 21 sites and new lands of GGNRA selected for dog management. Because the draft plan/EIS is a very large document we have attached excerpted applicable sections of the draft plan/EIS to assist with your review. These sections provide a

description of the preferred alternative and impact analysis for rare, threatened and endangered species and any designated critical habitat that are present or may potentially be present.

NPS recognizes that the public may not comply with the preferred alternative as described. To ensure resources, visitors and park staff are protected and that compliance with the CFR applicable to dog management is high, NPS has included a compliance-based management plan. If non-compliance occurs at a site, compliance-based management plan would be implemented to increase compliance with the new dog management regulations. Noncompliance would include dog walking within restricted areas, dog walking under voice and sight control in designated on-leash dog walking areas, and dog walking under voice and sight control outside of established ROLAs. When noncompliance is observed in an area, park staff would focus on enforcing the regulations, educating dog walkers, and establishing buffer zones, time and use restrictions, and SUP restrictions. If noncompliance continues and falls below 75 percent compliance in a management zone (measured as the percentage of total dogs / dog walkers observed during the previous 12 months not in compliance with the regulations), the area's management would be changed to the next more restrictive level of dog management. Impacts from noncompliance could reach short-term adverse, but the compliance-based strategy is designed to return impacts to a level that assumes compliance, as described in the overall impacts analysis, or provide beneficial impacts where dog walking is reduced or eliminated.

We have concluded that the preferred alternative for the selected 21 sites of GGNRA is "not likely to adversely affect" the coho salmon or steelhead trout. Therefore, we do not believe that formal consultation is required. Please tell us in writing within 60 days from the date of receipt, or no later than February 21, 2011 of this letter, if you do or do not concur with our assessment.

If, based on comments received during public review of the DEIS, NPS determines that the preferred alternative should be altered or amended in any way, NPS will submit a revised analysis with a new recommendation based on the new preferred alternative and associated impacts.

Should you need to informally discuss concerns before making your determination, please contact Daphne Hatch, Chief of Natural Resources and Management, at 415 331-0744.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frank Dean". The signature is fluid and cursive, with the first name "Frank" being more prominent than the last name "Dean".

Frank Dean
General Superintendent

Enclosures



Letter from the National Park Service to the State Historic Preservation Officer



United States Department of the Interior

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

IN REPLY REFER TO:

H4217 (GOGA-CRMM)

NOV 10 2010

Milford Wayne Donaldson
State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento CA 95816

Dear Mr. Donaldson:

The Golden Gate National Recreation Area (Golden Gate) is hereby initiating National Historic Preservation Act (NHPA) Section 106 consultation under 36 CFR 800 for its Dog Management Plan/Environmental Impact Statement (EIS).

As Paul Scolari (Historian and American Indian Liaison, Golden Gate) and Mark Beason of your office discussed and arranged, the park is carrying out this review according to the provisions at 36 CFR 800.3(g), Expediting Consultation. Use of this provision, where multiple steps in the Section 106 review process are addressed at once, is believed to be appropriate because the historic properties within the area of potential effect are well understood by the park and due to the minimal effects to cultural resources under the plan's proposals.

As Scolari and Beason also discussed and arranged, it is the park's intent to use the National Environmental Policy Act (NEPA) EIS for the dog management plan as fulfillment of compliance requirements related to Section 106 of NHPA, as allowed under 36 CFR 800.8.

The Draft EIS describes the plan's six alternatives, including the preferred alternative (chapter 2); the description of the project's area of potential effects and historic properties which will potentially be affected by plan implementation (chapter 3), and the effects to these resources--in compliance with both NHPA and NEPA--as a result of the implementation of the alternatives (chapter 4).

As the park completes its public review/comment period for the Draft Dog Management Plan/EIS, the alternative for implementation will be selected and the park will update the SHPO on the selection of this alternative, as well as on the associated effects to historic resources that will be caused by this selected alternative. At that point in time, NPS will seek your concurrence with a final finding of effect.

Description of Undertaking

Golden Gate is preparing a Dog Management Plan and EIS for the purpose of providing clear and enforceable guidelines for dog-walking activities in the park. Stated plan objectives include, among other things, the protection and preservation of the park's cultural resources. The analysis involving cultural resources covers portions of the park which fall within Marin and San Francisco Counties. Plan alternatives include a variety of on-leash and off-leash options which have the potential to affect properties listed or eligible for listing in the National Register of Historic Places (NRHP). The preferred alternative emphasizes recreational opportunities and experiences for multiple user groups, including dog walkers. The alternative would provide a no-dog experience in some areas and protection for significant cultural and natural resources. It would also include some areas for voice and sight control in Regulated Off-Leash Areas (ROLA).

Description of Area of Potential Effects (APE) and Historic Properties

Prior to analysis, and in accordance with 36 CFR 800.4(a)(1), the area of potential effects (APE) was established by the park. Seven non-contiguous areas within San Francisco and Marin Counties were defined as part of the overall APE (please refer to chapter 3—Affected Environment—of the EIS for detailed APE description and mapping).

As dog activity in an area can negatively affect sensitive cultural resources (i.e., trampling, digging, etc.) the APE boundaries were delineated by using the presence of dogs in plan areas where historic properties exist. In other words, where dogs are allowed in proximity to the locations of historic properties, or allowances for dogs are proposed for the future, these areas are included within the APE. The locations of historic properties were identified through review of Golden Gate records by its cultural resource staff.

Much of the area included in the APE is encompassed within large historic district boundaries including the Fort Miley Military Reservation; the Presidio National Historic Landmark (NHL); the Fort Mason Historic District; and the Forts Baker, Barry and Cronkhite Historic District. In addition, specific historic structures located within these larger districts, as well as at Fort Funston, were analyzed including permanent seacoast fortifications and their integral earthworks and Crissy Airfield. Three pre-contact archeological sites were also included in the analysis (Appendix I of the EIS contains a list of historic properties analyzed for the plan/EIS). All resources are either listed in or eligible for listing in the NRHP and are briefly described below.

Archeological Resources

Three archeological resources which could be affected by the plan are indigenous in nature. One is located in Marin County; two are located in San Francisco County. They are characterized in general as representing subsistence activities in the area—food procurement and preparation, tool production, etc. Golden Gate anticipates that implementation of this plan would result in no effects to these resources. Nonetheless, the park has informed potentially interested Coast Miwok and Ohlone representatives about the Dog Management Plan/EIS by means of its

quarterly communication tool, the *Native Update*, and has solicited input from these representatives.

Historic Structures

Historic structures which have the potential to be affected by the plan include:

- Several permanent seacoast fortifications and their integral earthworks (sometimes referred to as batteries)—these earthworks are described as earth placed over and around fortifications of brick, stone, and concrete (batteries) that were used as defensive structures and typically included a variety of artillery. Affected resources range in age from the late 19th Century to World War II. Earthwork portions of these permanent seacoast fortifications are inherently fragile in nature and are considered contributing resources to the larger historic districts in which most are located (see Historic Districts below).
- Crissy Airfield, established in 1919, functioned as the center of West Coast military aviation operations from 1921 to 1936. It is the only Air Coast Defense Station airfield in the country that retains the majority of its original buildings—hangars, barracks, guardhouse, etc.

Historic Districts included in analysis are related to the military history of the park which dates from Spanish settlement in 1776 through the 20th century.

- The Presidio National Historic Landmark was designated as such in 1962 and is the oldest Army installation operating in the American West and one of the longest-garrisoned posts in the country. Its size and longevity have resulted in a complex landscape with many overlapping historic layers. Its NRHP eligibility is related to its numerous historical, architectural, and archeological resources associated with important events in American history. Its period of significance is from 1776 to 1945 and the year 1951. The boundaries of the Presidio NHL encompass numerous cultural resources that could be affected by the plan, including Crissy Airfield, the U.S. Coast Guard Station Historic District, numerous seacoast fortifications and their integral earthworks, and field fortifications associated with Fort Winfield Scott and Fort Point. These resources are associated with the Presidio's Political and Military Affairs period (1865–1939) and the World War II period (1941–1945) and are considered as contributing to the significance of the Presidio NHL. Descriptions of the earthwork portions of seacoast fortifications and Crissy Airfield are found in "Historic Structures" (above).
- The Fort Mason Historic District is characterized by a collection of military structures with a period of significance ranging from 1855 to 1953. Earthwork portions of seacoast fortifications located within this historic district have the potential to be affected by the plan (see "Historic Structures", above).
- The Fort Miley Military Reservation was acquired by the U.S. Army in 1893 with the intent of constructing gun and mortar batteries for the defense of San Francisco Bay. It consists of three distinct complexes of structures. Earthwork portions of seacoast

fortifications at Fort Miley are considered contributing to the district's NRHP eligibility and have the potential to be affected under this plan (see "Historic Structures", above).

- The Forts Baker, Barry, and Cronkhite Historic District is associated with the history of coastal defense in the San Francisco Bay Area and was designed to enhance those at the Presidio, south of the Golden Gate, in guarding against the entry of enemy ships into San Francisco Bay. Its period of significance ranges from 1866 to 1974. Resources that could be affected by the plan include earthwork portions of seacoast fortifications at Fort Baker (see "Historic Structures", above), as well as numerous field fortifications primarily associated with Fort Cronkhite.

Finding of Effect

NEPA analysis and Section 106 findings have been completed for all cultural resources (three archeological resources; multiple historic structures; four historic districts) that could be potentially affected as a result of implementation of the dog management plan (see chapter 4 of EIS). Application of the Criteria of Adverse Effect (36 CFR 800.5) has resulted in the preliminary determination that the project will have an effect on historic properties within the APE, but the effect is "not adverse".

As stated above, as the park completes its public review/comment period for the Draft Dog Management Plan/EIS, the alternative for implementation will be selected and the park will update the SHPO on the selection of this alternative, as well as on the associated effects to historic resources that will be caused by this selected alternative. At that point in time, NPS will seek your concurrence with a final finding of effect.

In the mean time, if you have any questions about this information or the Draft EIS, please contact Paul Scolari at paul_scolari@nps.gov, or 415-561-4963.

Sincerely,



Frank Dean
General Superintendent

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



Letter from the National Park Service to the California Coastal Commission



United States Department of the Interior

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

IN REPLY REFER TO:

L76 (GOGA-PLAN)

DEC 15 2010

Larry Simon
Federal Consistency Coordinator
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, California 94105

Subject: Assessment of Coastal Consistency Determination for the Dog Management Plan
Environmental Impact Statement, Golden Gate National Recreation Area

Dear Mr. Simon:

Attached please find the Dog Management Plan Draft Environmental Impact Statement (Plan/DEIS). The Plan/DEIS purpose is to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the Golden Gate National Recreation Area (GGNRA). The National Park Service (NPS) will be seeking concurrence from your agency the Plan to be implemented is consistent with the Federal Coastal Zone Management Act of 1972, as amended.

The Alternatives in this Plan/DEIS address 21 locations within GGNRA. The selection of sites addressed was determined by NPS managers, and was based on information from historical and current dog management practices within GGNRA, including the 1979 Pet Policy; NPS law, policy, and regulations; park resources; and the Federal Panel Recommendations to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. The plan/EIS only addresses lands that are directly managed by GGNRA and certain additional lands that will be directly managed by the park in the near future. The 21 sites under consideration for this plan/EIS and the project area are shown in the attached Figure 1.

The objectives of the Plan/DEIS include:

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

- Protect native wildlife and their habitat (including sensitive species and their habitat, and federally or state listed, unique, or rare species) from detrimental effects of dog use, including harassment or disturbance by dogs.
- Minimize degradation of soil and water resources by dog use.
- Preserve opportunities for future natural resource restoration and enhancement.

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

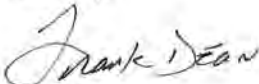
Based on analysis within the Draft EIS, the Preferred Alternative should, over the long term, provide beneficial effects to coastal resources by: 1) minimizing access to the surface waters of San Francisco Bay and the Pacific Ocean adjacent to the applicable GGNRA sites; 2) reducing opportunities for soil disturbance and erosion that could impact water quality and aquatic habitats; 3) protect and conserve sensitive species and habitats by prohibiting access to sensitive areas; 4) require control of dogs by owners at all times; and 5) increase compliance with waste removal.

The lands under consideration in this Plan/DEIS are excluded from the coastal zone, as they are wholly owned (or will be by the time the compliance effort is concluded) federal land, operated by the National Park Service - Department of the Interior.

Based on the anticipated benefits to coastal resources the NPS is confident the Plan is consistent with the CZMA and therefore does not require a Consistency Determination. The NPS will be submitting for your concurrence a "Negative Determination" (15 CFR Sec. 930.35(d)) for this Plan. After your review of the Plan/DEIS, and consideration of NPS's intention of submitting a "Negative Determination", the NPS requests confirmation this approach will gain concurrence from your agency.

If you have any questions regarding this request please contact Steve Ortega, at (415) 561-2841, or email at steve_ortega@nps.gov. Thank you for your consideration.

Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

Attachment:

Figure 1 – Vicinity Map



Letter from the National Park Service to the San Francisco Bay Conservation and Development Commission



United States Department of the Interior

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

IN REPLY REFER TO:

L76 (GOGA-PLAN)

DEC 15 2010

Mr. Bob Batha
San Francisco Bay Conservation
and Development Commission
50 California Street
San Francisco, CA 94111

Re: Assessment of Coastal Consistency Determination for the Dog Management Plan
Environmental Impact Statement, Golden Gate National Recreation Area

Dear Mr. Batha:

Attached please find the Dog Management Plan Draft Environmental Impact Statement (Plan/DEIS). The Plan/DEIS purpose is to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the Golden Gate National Recreation Area (GGNRA). The National Park Service (NPS) will be seeking concurrence from your agency the Plan to be implemented is consistent with the Federal Coastal Zone Management Act of 1972, as amended, and the San Francisco Bay Plan.

The Alternatives in this Plan/DEIS address 21 locations within GGNRA. Some of the sites are within the San Francisco Bay (i.e. Crissy Field) and likely fall under the 'park priority use areas' of the San Francisco Bay Plan. The selection of sites addressed was determined by NPS managers, and was based on information from historical and current dog management practices within GGNRA, including the 1979 Pet Policy; NPS law, policy, and regulations; park resources; and the Federal Panel Recommendations to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. The plan/EIS only addresses lands that are directly managed by GGNRA and certain additional lands that will be directly managed by the park in the near future. The 21 sites under consideration for this Plan/EIS and the project area are shown in the attached Figure 1.

The objectives of the Plan/DEIS include:

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

- Protect native wildlife and their habitat (including sensitive species and their habitat, and federally or state listed, unique, or rare species) from detrimental effects of dog use, including harassment or disturbance by dogs.
- Minimize degradation of soil and water resources by dog use.
- Preserve opportunities for future natural resource restoration and enhancement.

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

Based on analysis within the Draft EIS, the Preferred Alternative should, over the long term, provide beneficial effects to coastal resources by: 1) minimizing access to the surface waters of San Francisco Bay and the Pacific Ocean adjacent to the applicable GGNRA sites; 2) reducing opportunities for soil disturbance and erosion that could impact water quality and aquatic habitats; 3) protect and conserve sensitive species and habitats by prohibiting access to sensitive areas; 4) require control of dogs by owners at all times; and 5) increase compliance with waste removal.

The lands under consideration in this Plan/DEIS are excluded from the coastal zone, as they are wholly owned (or will be by the time the compliance effort is concluded) federal land, operated by the National Park Service - Department of the Interior.

Based on the anticipated benefits to coastal resources the NPS is confident the Plan is consistent with the CZMA and the San Francisco Bay Plan. After your review of the Plan/DEIS, please advise us of any concerns you may have regarding this draft Plan/DEIS, and suggestions for completing compliance with your agency.

If you have any questions regarding this request please contact Steve Ortega at (415) 561-2841, or email at steve_ortega@nps.gov. Thank you for your consideration.

Sincerely,



Frank Dean
General Superintendent

Enclosure:
Figure 1 – Vicinity Map



Quick Start Guide to the Plan/DEIS Posted on the Planning, Environment, and Public Comment Website by the National Park Service, January 2011

Golden Gate National Recreation Area

National Park Service
U.S. Department of the Interior
Golden Gate
National Recreation Area



The Plan/DEIS contains two volumes and is over 2400 pages in length. It is a compilation of alternatives and analyses for 21 different areas of the park. For those who may not be able or wish to read the entire document, we suggest you focus on the Executive Summary and Chapter 2, which describes in detail the management prescriptions for the 21 separate areas covered by the Plan/DEIS. You also may want to focus your review on the park area that is of particular interest to you.

- **Executive Summary.** This section provides background and a brief synopsis of the 5 different management options for dog walking as well as the preferred alternative for each of the 21 areas considered, describing where and under what conditions dog walking may be allowed.
- **Chapter 1.** This chapter provides project background, purpose and need for a Plan/EIS.
- **Chapter 2.** This chapter lays out in detail 5 different management options (alternatives) for addressing dog walking in each of the 21 park areas, as well as the preferred alternative for each area, chosen from the 5 alternatives. The preferred alternative represents what NPS believes would best accomplish the purpose and need of the proposed action while fulfilling its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors. The maps of each alternative are in the back of Volume 2.
- **Chapters 3-5.** Chapter 3 describes the existing environment at Golden Gate National Recreation Area; Chapter 4 contains the detailed analyses of the environmental impacts of each alternative; Chapter 5 describes the consultation and coordination NPS conducted in drafting the Plan/DEIS.

If you received a DVD: this contains searchable PDF text files and is meant for a computer only, not a DVD player.

Errata: In a document this size there will inevitably be inadvertent mistakes. Please check the PEPC website (<http://parkplanning.nps.gov/dogplan>) for a list of corrections that we will continually update as we receive public comment on the Draft Plan/DEIS.

**COMMENTS RECEIVED FROM FEDERAL, STATE, AND OTHER
AGENCIES ON THE DRAFT PLAN/DEIS DATED JANUARY 2011**


PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 1890

Author Information

Keep Private: No

Name: Lynn Woolsey

Organization: US Congress, 6th District, California  Official Rep.

Organization Type: F - Federal Government

Address: House of Representatives
2263 Rayburn Building
Washington, DC 20515
USA

Correspondence Information

Status: Reviewed Park Correspondence Log:

Date Sent: 04/06/2011 Date Received: 04/07/2011

Number of Signatures: 1 Form Letter: No

Contains Request(s): No Type: Letter

Correspondence Text

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

Dear Superintendent Dean:

Thank you for your work in preparing the Dog Management Plan/Draft Environmental Impact Statement (DEIS) which was released in January. National Park Service staff put a considerable amount of effort into preparing a thoughtful document that explores five options, with a preferred alternative that attempts to balance protections for the park's natural resources with the public's right for exercise and recreation.

As an urban area park/recreation area, GGNRA has a unique mandate. The final plan must include options for public use, both with and without dogs, as well as safeguards for environmentally sensitive areas.

Many constituents in Marin County, however, have contacted me with concerns that the preferred alternative severely reduces the areas open to people with dogs. As you know, residents value the opportunity for exercise on the trails of Southern Marin with their canine companions. It is my understanding that several groups have put forward additional alternatives that they believe will protect the environment while allowing for greater recreational use with dogs. One proposal, for example, suggests using mostly existing fire trails near parking areas as well as a timed approach to some of the higher use areas.

I urge you to consider all these proposals as you work to finalize the Dog Management Plan. I am sure a plan can be developed that acknowledges both recreational and environmental requirements.

Sincerely,

Lynn Woolsey
Member of Congress

PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 2807

Author Information

Keep Private: No

Name: Cay C. Goude

Organization: USFWS Sacramento Office  Official Rep.

Organization Type: F - Federal Government

Address: Sacramento Fish and Wildlife Office
2800 Cottage Way
Sacramento, CA 95825-1846
USA

E-mail:

Correspondence Information

Status: Reviewed Park Correspondence Log:

Date Sent: 03/22/2011 Date Received: 03/23/2011

Number of Signatures: 1 Form Letter: No

Contains Request(s): No Type: Letter

Notes:

Correspondence Text

Memorandum

To: General Superintendent, National Park Service. Golden. Gate National Recreation Area, Fort Mason San. Francisco, California

From: Assistant Field Supervisor. Sacramento Fish and Wildlife Office, Sacramento, California

Subject: Comments on the Draft Dog Management Plan and Environmental

Impact Statement, Golden Gate National Recreation Area, California

The U.S. Fish and. Wildlife Service's (Service), Sacramento Fish and Wildlife Office, is providing comments on the Draft Dog Management Plan / Environmental Impact Statement (Draft Plan/EIS) for Golden Gate National Recreation Area (GGNRA) under the authority of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.) (Act). At issue are the potential effects of the project on the federally threatened California red-legged frog (*Rana draytonii*), western snowy plover (*Charadrius alexandrinus nivosus*), northern spotted owl (*Strix occidentalis caurina*), and Marin dwarf-flax (*Hesperolinon congestum*); as well as the federally endangered San Bruno elfin butterfly (*Callophrys mossii hayensis*), mission blue butterfly (*Icaricia icarioides missionensis*), tidewater goby (*Eucyclogobius newberryi*), San Francisco garter snake (*Thamnophis sirtalis tetratctenia*), Presidio manzanita (*Arctostaphylos hookeri ravenii*), San Francisco lessingia (*lessingia germanorum*), California seablite (*Suaeda californica*), and Hickman's potentilla (*Potentilla hickmanii*).

This letter is based on: (1) A letter dated December 28, 2010 from the GGNRA to the Service requesting comments on their Draft Plan/EIS; (2) Draft Dog Management Plan / Environmental Impact Statement; and, (3) other information available to the Service.

The purpose of the Draft Plan/EIS is "to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park". Objectives of the Dog Management Plan are: to preserve and protect natural and cultural resources and natural processes; provide a variety of visitor experiences; improve visitor and employee safety; reduce user conflicts; and to maintain park resources and values for future generations. The Draft Plan/EIS addresses dog management alternatives for 21

locations within GGNRA. One of the 21 locations is "new lands-. New lands are defined as "any land acquired by the park during the dog management planning process or after the plan/EIS and rule are finalized, unless specifically addressed by the plan." The 21 locations are within Marin, San Francisco and San Mateo Counties. The Draft Plan/EIS proposes 6 alternatives, with one being preferred and one being no-action, for each of the 21 locations. Each of the 21 locations within the Draft Plan/EIS was assigned a preferred alternative using a "modified Choosing by Advantages process". As part of their analysis, GGNRA identified the environmentally preferable alternative for all 21 sites. This alternative was identified as the one which would "cause the least damage to the biological and physical environment" and best promote the National Environmental Policy Act. The environmentally preferable alternative corresponded with the National Park Service preferred alternative at only 4 of the 21 locations. While not meeting the criteria for being the environmentally preferable alternative, the preferable alternative chosen for the other 17 locations adequately addresses the Service's concerns for threatened and endangered species and critical habitat.


The Service believes that the Draft Plan/EIS, as proposed, meets the goals and objectives of the project and adequately addresses federally threatened and endangered species and habitat within the project area so as to not jeopardize listed species or destroy or adversely modify critical habitat. In contrast to the current "dog policy" within GGNRA, the Draft Plan/EIS appears to promote a beneficial effect to listed species and critical habitat. The adoption of a compliance- based management strategy is viewed as an important component of the Draft Plan/EIS and instills confidence that GGNRA will continue to manage their lands with an emphasis on managing sensitive resources responsibly. Additionally, the proposed measures for increasing public awareness through education and standardized management is viewed as a key factor in the successful implementation of this Draft Plan/EIS.

The Service would like to thank GGNRA for the opportunity to comment on this Draft Plan/EIS Please contact Dan Cordova, Endangered Species Biologist, or Ryan Olah, Coast Bay Branch Chief, at the letter head address, via electronic mail (Dan_Cordova@fws.gov; Ryan_Olah@fws.gov), or at telephone (916) 414-6600 if you have any questions.

PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 4253

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May 26, 2011

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

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

My husband and I are native Californians with long ties to the Bay Area. We are both committed conservationists; my husband helped draft the Endangered Species Act during his years in the U.S. Congress, and he co-chaired the first Earth Day. We must go on record as strongly disagreeing with the GGNRA's current "preferred alternative" in the DEIS. As the responsible owners of five dogs, we are very dismayed with the significant restrictions on, and elimination of, off-leash dog walking in many areas in the GGNRA. It is our opinion that the proposed regulations making changes to the long-standing 1979 Pet Policy are not fact-based. We do not see well-documented, scientific, monitoring-based facts that can accurately allocate blame specifically to dogs in a site-specific manner that differentiates, for instance, the significant impact of large events, bicyclists, boot camps, homeless people, teenagers, impacts of other species, weather events, etc.

For many people, the companionship of dogs is essential to their well-being, and the healing capabilities of dogs, for instance to veterans, is science-based and well-founded. Yet the new proposed regulations seem clearly anti-dog, and do not serve the public well.

Additionally, it seems unreasonable to eliminate ALL dog walking on any new land additions to the GGNRA. Such decisions should be based on monitoring data and be site-specific. As they are now proposed, such sweeping exclusions are arbitrary. We have hiked in the GGNRA and visited Crissy Field many, many times. We have rarely seen dogs stray into restricted areas- actually, children, teens, and homeless people are more likely errant in this regard. We have never seen any dog be aggressive to any human. There is the occasional very minor dog skirmish, which in our experience has never been more than a vocalization or body posture, which are totally normal and no cause for restrictions such as the ones you are proposing in the so-called preferred alternative. Since 99% of the GGNRA land is already off-limits to dogs and their humans, the restrictions are truly objectionable. This document presents an "either-or" approach to the conservation of natural habitat and recreational uses. In fact, the vast majority of dog owners are good land stewards who understand the necessity of protecting natural resources. The "preferred alternative" dismisses the responsible majority of dog owners in order to attempt to eliminate a tiny minority of irresponsible ones. A far better approach is to provide clear signage that educates the public on areas of concern. Enlisting the animal welfare, conservationist and dog-owning communities in such an effort could create goodwill and be a constructive way to make the current rules more clear. Education and cooperation are always more effective in increasing compliance than prohibition and regulatory heavy-handedness. Frankly, the document as a whole has an almost adversarial feel to the very nature of the many communities the GGNRA was designed to serve, and sets itself apart from those communities. Because the Draft Environmental Study did not include in its scope the GGNRA's impacts on the urban world to which it is in many areas adjacent, it fails to embrace an essential part of what makes it unique: that it is the wild sibling to a dense, urban world. Yet that urban world is filled with lovers of the GGNRA- dog owners amongst them.


The GGNRA's DEIS and "preferred alternative" seems to miss a world of opportunity in creating communities of interest with those affected by it. This includes the City itself, whose parks will see much greater pressure if the GGNRA further restricts recreational use in the manner it proposes. Where alliances could be built, the proposed "preferred alternative" creates alienation. There appears to be a significant bias against the No Action option. We support Alternative A, with site-specific, monitoring-based analysis on any new land additions to the GGNRA.

Sincerely, Helen and Pete McCloskey

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Dear Frank:

The Presidio Trust (Trust) recognizes the importance of the National Park Service's (NPS) efforts to manage dog walking on national park sites and submits the attached comments on the Draft Environmental Impact Statement for Dog Management (DEIS) in the Golden Gate National Recreation Area (GGNRA) in support of this process. The Trust has a key interest in NPS dog management planning in the GGNRA and therefore in the adequacy of the EIS. It is for this reason that the Trust is participating as a cooperating agency in the National Environmental Policy Act (NEPA) process for the dog management project.

We commend the NPS's hard work to date in attempting to craft a thoughtful resolution to a long-standing and impassioned controversy to further the effective management of GGNRA public lands. However, as discussed in the attachment to this letter, we believe that further effort will be required to thoroughly analyze potentially significant impacts. Until that work is done, it would be premature of the Trust to voice a judgment with respect to any of the alternatives, including the preferred alternative.

As the steward of the interior portion of the Presidio, known as Area B, which is adjacent to lands that are managed by the NPS, or Area A, the Trust brings expertise in managing diverse park resources in an urban environment. With more than 8,000 people living, working, or attending school in Area B of the Presidio, in addition to daily recreational users, the Trust understands the challenges of maintaining a balance among the differing, often competing needs of many users so that the Presidio's resources can be enjoyed today while also safeguarded for the future.

Experience over the past decade and more has shown us that major planning decisions made for Area A invariably affect operations, resources, and activities in Area B. Area B contains approximately 20 miles of trails and 1100 acres of developed areas and open space directly adjacent to Crissy Field and Baker Beach, both of which receive intense visitor use, including that from dog walkers. Tighter restrictions on dogs in these waterfront areas will almost certainly increase dog-walking activities in Area B, resulting in

potentially significant impacts to Trust-managed parkland.

The Trust well knows that managing conflicting visitor uses on public lands while simultaneously protecting natural resources for future generations is a difficult task. In the context of a complex, controversial, and volatile issue such as dog management in a dense urban area, the task becomes much more challenging. The Trust also understands the demands faced by NPS staff and contractors in preparing the DEIS, and applauds the hard work that has gone into preparing the document and engaging the public.

Of necessity, the Trust's comments focus on areas in the DEIS that need augmentation, and we hope that our comments will be taken in the spirit in which they are offered: to improve the impacts analysis that informs the NEPA process and ultimately to support the formulation of a dog management policy for the GGNRA that wisely balances the mandates of resource stewardship, preservation, and public use.

Craig Middleton
Executive Director

Enclosure

PRESIDIO TRUST
COMMENTS ON THE GGNRA DOG MANAGEMENT PLAN /
DRAFT ENVIRONMENTAL IMPACT STATEMENT

May 25, 2011

The Presidio Trust (Trust) provides the following comments on the GGNRA Dog Management Plan / Draft Environmental Impact Statement (project). Due to the length of the DEIS and limits on Trust staff time to review, the following comments focus on the NPS's preferred alternative and indirect impacts on Area B, but the comments generally apply to all alternatives.

GLOBAL COMMENT

DEIS Fails to Analyze Indirect Impacts of Dog Management on Area B in a Meaningful Manner

The Trust finds the DEIS deficient in its treatment of impacts of the various alternatives for managing dog walking activities on areas outside of NPS jurisdiction, particularly in Area B. In the Trust's scoping letter¹ for the DEIS, we specifically urged that "because the Trust has a stake in how dogs within Area A will be managed, the EIS should include a discussion of how the alternatives will impact Area B visitors and resources, and Trust staff" (page 2). Dog walkers using the Presidio do not necessarily distinguish between the two areas. The DEIS does not address the areas within Area B that are currently used by dog walkers, nor does it address the incidence of off-leash violations in Area B. The DEIS presumes under all resource topics and all alternatives being considered that no impacts would occur in Area B. The rationale offered is that the Trust does not have beaches under its jurisdiction and does not allow off-leash dog walking; therefore, there would be no change in current conditions in Area B. It is far more likely, however, that restricting or eliminating dog walking in Area A will substantially increase off-leash activity in Area B as a substantial number of dog walkers may seek more secluded trails in the Presidio to avoid crowded conditions and where there may also experience fewer law enforcement staff to enforce rules.

The analysis and conclusions offered by the NPS in the DEIS are not sufficiently supported and do not represent a fair consideration of the adverse environmental effects of its proposed dog management. The dismissal of impacts in Area B is especially perplexing given that the DEIS provides a site-specific analysis of the effects of on-leash dog walking in other parts of the GGNRA, even after assuming compliance with regulations. The DEIS must make a good faith effort to thoroughly consider all indirect effects that are "reasonably foreseeable"² in areas outside of its jurisdiction. The Trust is willing to

provide data and information to the NPS. Under NEPA, if a significant issue is omitted and the advice and expertise of a cooperating agency ignored, the EIS may be found to be inadequate.³

I. SPECIFIC COMMENTS

CHAPTER 1: PURPOSE AND NEED FOR ACTION

Reference to Area B is Confusing

As stated in the Introduction on page 1, without reference to Area A, it appears to the casual reader that Area B is adjacent to the Presidio, which it is not. The discussion should distinguish between Area A and Area B, and indicate that Area B is a national park site under separate jurisdiction. Some background about why the Trust is a cooperating agency would also be helpful. Otherwise, the reader is required to sift through 1733 pages to understand the Trust's interests, authority, and responsibility in the NPS dog management project (as provided in Chapter 5: Consultation and Coordination).

Increased Conflicts on Adjacent Parks due to Tighter NPS Restrictions not Acknowledged

The second issue under Land Use / Long-term Management of Resources or Land on page 17 of the DEIS correctly states that dog management policy at GGNRA may result in changes to federal, state, and local policies elsewhere. However, the key issue that more restrictive dog management policies on GGNRA lands would increase pressure on adjacent parks (such as Area B) is not mentioned. Also, the topic of land use is included in the list of impact topics that were analyzed in the plan/EIS, but is not followed through in Chapters 3 and 4, as is customary for an EIS of this nature.

Information on Area B Dog Management Policies and Issues is Absent

The NPS's "goal of consistency" is commendable and should be made more explicit as a specific objective that the NPS intends to accomplish by this process. In the Summary of Background Conditions and Review of Literature beginning on page 25 of the DEIS, the discussion states that park staff "has amassed as much information as could be found on dog management-related topics" on lands adjacent to or near GGNRA sites. The discussion suggests that such information, including that provided by other jurisdictions, was used to "assist with the development of alternatives that meet the goal of consistency with policies on adjacent lands." However, nowhere is found any mention of Trust dog management regulations, or information on Area B visitor experience/dog management conflicts, enforcement success, or compliance issues. This information has been made available to the NPS in previous correspondence and is readily available from the Trust upon request. The information should be included so the public and NPS decision makers may have an understanding of potential conflicts in adjacent areas caused by changes in NPS dog-related recreational opportunities on GGNRA lands.

The Upcoming GGNRA General Management Plan Should be the Principal Tool for Resolving Dog Management Issues

On Page 37 of the DEIS, the NPS states that it is updating its General Management Plan (GMP) for the GGNRA concurrently with the Dog Management process and that the GMP will defer specific dog-management actions to the completion of the Dog Management EIS. Not only is decoupling the two processes inconsistent with NPS policy' on how a park's resources, visitors, and facilities should be planned for and managed, it forecloses the important opportunity of conducting the dog management planning process within a well-grounded and broadly understood framework. Park planning is intended to be a deliberate and transparent decision- making process that arrives at a rationale for management directions after several levels of increasingly detailed and complementary planning. The Trust strongly suggests that the NPS first determine what the desired conditions should be for natural and cultural resources as well as for visitor experiences, or in NPS's words, reach agreement on what should be the "blueprint for the park to move into the future" (page 37 of the DEIS). Only then should the focus

narrow to how various dog management strategies throughout the GGNRA would contribute to achieving those conditions, and whether such strategies are consistent with the goals articulated in the GMP.

Analysis of Consistency with Trust Land Use Policies for Area B is Required

The Trust welcomes the discussion on page 38 of the DEIS that we provided in our scoping letter regarding the distinctions between the General Management Plan Amendment for Area A and the Presidio Trust Management Plan (PTMP) for Area B. At the end of the third paragraph, please insert the following:

Management objectives in the PTMP relevant to dog management include the following:

- 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.

As required by the NEPA and as requested in our scoping letter, the EIS should include a discussion of the conflicts of the dog management project with the Trust's land use policies provided above.⁵

Trust Regulations Regarding Dog Management are Absent

From pages 34 to 42 under Related Laws, Regulations and Policies, the DEIS fails to mention Trust regulations regarding dog management.⁶ This information was previously provided to NPS. Again, the DEIS should note that Area B is subject to the Presidio Trust's regulations, which the Trust adopted after publication for comment and which appear at 36 C.F.R. Section 1001 et seq. Also, it would be expedient but inaccurate to list the Trust with the 11 agencies listed under State and Local Laws, Regulations, and Policies on page 41 of the DEIS. Area B of the Presidio is a national park site within the GGNRA, and the Trust, like the NPS, is a federal government agency charged with representing national interests.⁷ The Trust's regulations are issued pursuant to the Presidio Trust Act,⁸ and as such are elements of federal law.

CHAPTER 2: ALTERNATIVES

Regulating Commercial Dog Walkers will Require Coordination with Adjacent Jurisdictions

Commercial dog walking would be regulated under all alternatives being considered. Various commercial dog walking businesses frequently use Area B to exercise dogs under their care. While the Trust currently does not require a permit for commercial dog walkers, such activity is subject to regulation under 36 C.F.R. 1005.3. Changes in NPS park policy that would restrict or prohibit use of Area A by commercial dog walkers would likely significantly increase the number of dogs brought into Area B by these businesses. This impact on Area B should be identified and evaluated. In addition, it should be acknowledged that creating and implementing an enforceable policy for commercial dog walking in the Presidio will require close coordination with the Trust and other surrounding jurisdictions to ensure consistency of the permitting process and the avoidance of unintended spillover effects.

CHAPTER 3: AFFECTED ENVIRONMENT

GGNRA Visitation Trends are Inflated due to Inclusion of Area B

The DEIS makes clear that Area B is not included in the dog management study area. However, park visitation information provided on pages 266 to 270 includes visitors to Area B. The entire Presidio currently accounts for approximately 29% (approximately 4.0 million) of the mean annual visitation GGNRA-wide (approximately 14 million). Visitor counts should recognize Area B's contribution to the GGNRA visitation, or be subtracted from the total.

CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

The Cumulative Impact Scenario Fails to Acknowledge Trust Actions under the PTMP

In determining what projects are necessary for a cumulative impacts analysis, the NPS should focus on the extent to which information is "relevant to reasonably foreseeable significant adverse impacts" and is "essential to a reasoned choice among alternatives." The DEIS on page 290 states that the actions, projects, and programs listed in Appendix K were compiled for the cumulative impacts analysis. However, most of the listed projects are irrelevant to decisions about the dog management project, and their listing adds no value to the analysis. Only a handful of the listed plans and projects are discussed in the cumulative impacts of the project for each resource topic. As encouraged by the CEQ,⁹ the cumulative impacts analysis should only "count what counts."

The Trust is implementing a number of historic building rehabilitation, landscape improvement, and habitat restoration projects under the Presidio Trust Management Plan. These projects include rehabilitation and reuse of approximately 100,000 square feet of space in 10 buildings along the edge of the proposed regulated off-leash area (ROLA) at Crissy Airfield, restoration of the Quartermaster Reach ecological corridor draining directly into Crissy Field Marsh that will allow expansion of the marsh, and new trails (including the Tennessee Hollow, Park, and Presidio Promenade trails) that will provide better connections from Area B to Crissy Field. These projects are highly relevant to the cumulative impacts analysis but are conspicuously absent. It is simply not possible for the DEIS to provide an adequate analysis of Crissy Field cumulative impacts without consideration of Trust projects, as they have and will continue to affect shoreline activities in Area A, including dog management, and will incrementally contribute to the cumulative effect on resources affected by the project. The cumulative impact analysis must incorporate information based on Trust planning and NEPA documents, notably the PTMP. Including relevant Trust projects would have added value to the cumulative impact analysis and would be more true to the letter and intent of CEQ's NEPA regulations. The addition of Trust projects to the analysis would also have been an easy task had the NPS consulted with the Trust.¹⁰

Impacts on Area B Soils are Underestimated

The impact analysis on page 369 of the DEIS assumes that no, impacts on soils in adjacent lands would occur under the preferred alternative since ROLAs would be provided at Crissy Field. The Trust disputes this conclusion. Tighter restrictions, including ROLAs, would inevitably increase visitation by dog walkers in other areas. Those areas in Area B that are frequented by dog-walkers, such as the Mountain Lake and Ecology Trails, would experience increased dog activity which would increase impacts that would be both long term and readily apparent.

Impacts on Area B Water Quality are Overlooked

The discussions on pages 503 and 509 of the DEIS conclude that there would be no indirect impacts on water quality in Area B since ROLAs would be provided at Crissy Field and Area B does not have beaches. Fewer areas available for dogs and more restrictions at Crissy Field and Baker Beach would likely result in an increase in dog walking activity in Area B. In addition, although Area B does not contain beaches, it does have important water bodies including Mountain Lake and Tennessee Hollow watershed, which are undergoing restoration. The areas surrounding these water bodies are already used by dog walkers. Indirect impacts on water quality from increased dog walking should be analyzed.

Known Impacts on Area B Vegetation are Summarily Dismissed

On page 657 of the DEIS and elsewhere in the vegetation section, the analysis concludes that "indirect impacts on coastal scrub/chaparral/grassland vegetation in adjacent lands from increased dog use would be negligible because it is unknown where and to what extent coastal scrub/chaparral/grassland vegetation in adjacent parks could be affected by dogs." This superficial analysis is not the "hard look" necessary to satisfy NEPA's requirements.¹¹ Put more simply, impacts cannot be deemed negligible because the analysis has not been done. Fortunately, site-specific information on native plant communities within Area B is readily available, mapped on page 14 of the PTMP, and retrievable through the Trust's geographic information system upon request. Several of these native plant communities, including serpentine and coastal prairie grasslands, represent the largest intact communities of their kind in the Presidio. Dismissing indirect impacts on important plant communities in Area B simply because "the Presidio does not allow off-leash dog walking" is erroneous and misguided. Even if compliance with the leash laws were assumed, impacts would still occur along trail corridors, affecting plants that grow in the soils immediately adjacent to the trails. Thus, even indirect impacts would be measurable, perceptible, and important to address.

Impacts on Area B Visitor Experience are Discounted

On page 1407, the DEIS candidly states that "some alternatives include restricting or eliminating dog walking at a particular site. In these cases, there is a potential for dog walkers currently using those sites to move to a different location in GGNRA or to a location outside the park so that they can continue to exercise their pets." Nevertheless, the analysis on page 1480 of the DEIS concludes that there would be no indirect impacts on visitor experience in Area B despite a substantial reduction of off-leash area at Crissy Field. The Trust disagrees with this conclusion. We strongly believe that enhanced restrictions at Crissy Field will boost dog walking activity in Area B. Similarly, the DEIS assumes on page 1494 that dog owners and walkers would continue to use Baker Beach for dog walking activities even though leashes would be required, because some visitors enjoy the experience of dog walking at the beach. The DEIS concludes that no indirect impacts on visitor experience in Area B would be expected, since Area B does not have beaches. The Trust maintains that a substantial number of dog walkers at Baker Beach would seek other areas in the Presidio where they might face a lesser enforcement threat of the leash law than on the highly visible Baker Beach. Visitor incidents related to dogs in Area B would also be expected to increase. Some current visitors to Area B may begin avoiding areas of the park due to the presence of more dogs.

Impacts on Trust Operations Must be Considered

The U.S. Park Police (USPP) San Francisco Field Office with headquarters at Building 1217 in Area B is responsible for law enforcement at the Presidio. A substantial portion of funding¹² for law enforcement programs within both Areas A and B comes from the Trust through an interagency agreement. Law enforcement activities pertaining to dog management are costly and include resolving conflicts between dog walkers and other user groups, giving written or verbal warnings or issuing citations to dog walkers not complying with the current regulations, educating the public on dog management regulations, and preparing and filing reports related to dog and visitor incidents. Where violators are prosecuted, USPP officers may have to take paid duty time to appear as witnesses. As noted in the DEIS, changes in NPS dog walking policies over the years, court decisions regarding dog walking in the NPS-managed areas of GGNRA, and public confusion due to both these changing circumstances has led to varying levels of enforcement in the Presidio. The public confusion in Area A and current relaxed regulations on NPS-managed GGNRA lands has made enforcing the Trust's on-leash dog walking regulation in Area B difficult.

An increase of dog-walking activities in Area B would also result in higher operation and maintenance costs for dog walking areas, e.g. installation of added protection measures such as fencing, additional education (signs, brochures and public meetings), and response to more visitor concerns, questions and complaints. Noncompliance citations and visitor conflicts would increase, requiring greater USPP capacity to implement the NPS and Trust dog management regulations in a consistent manner.

The estimated costs to complete the tasks necessary to implement the NPS dog management plan provided on page 1569 of the DEIS do not take into account the Trust's additional costs or demand on resources. The DEIS should assess the impacts of the project on the Trust's annual operating budget. The evaluation should include financial requirements associated with short-term impacts that would occur during the initial public education period and the law-enforcement activities in Area B once the NPS begins the implementation of a new regulation. The additional operating and capital costs associated with long-term effects on Trust operations should also be considered.

APPENDICES

Area B Omitted from List of Adjacent Dog Use Areas

Appendix J of the DEIS lists over 140 parks/sites within and adjacent to NPS-managed GGNRA lands, and provides information such as dog use areas and leash requirements. Many on the list only allow on-leash dogs, such as Muir Beach, Marin Municipal Watershed District lands, and Glen Canyon Park in the city. However, no mention is made of Area B, even though it contains approximately 20 miles of trails and 685 acres of developed areas for on-leash dog walking directly adjacent to Crissy Field and Baker Beach. To correct this error, the following should be provided on page J-9:

Dog Use Area: Presidio Area B

Location: See GGNRA Map

On-Leash/Off Leash: On-Leash

Additional information: http://www.presidio.gov/NR/rdonlyres/A26635BC-AE79-4EDA-846BBF5700B926A5/0/PresidioTrailsMap_SEPT2010.pdf

Source: <http://www.presidio.gov/NR/rdonlyres/E5138135-A64D-4228-9912-C69CAF92CBBE/O/CFR1002.pdf>

No Trust Projects Represented in List of Actions Considered for the Cumulative Impacts Analysis

Appendix K lists more than 80 projects and actions within and outside the boundary of the GGNRA that were conceivably compiled for consideration in the cumulative impact analysis. Only a small number of the listed projects incrementally contribute to the cumulative impacts on resources affected by the dog management project, and fewer still are discussed in Chapter 4 of the DEIS. Furthermore, only 2 of the actions are Trust activities (the Presidio Vegetation Management Plan and the Presidio Trails and Bikeways Plan), and these are presumably listed only because the NPS was directly involved. Despite the questionable listing of such a broad array of projects, no other Trust projects or actions, including the PTMP, the Main Post Update to the PTMP, Quartermaster Reach, and the Main Parade, are represented in the appendix. As discussed above, the inclusion of Trust actions occurring in proximity to Area A is necessary to permit a complete analysis of cumulative effects of the project. The NPS should review the Trust's planning and environmental documents¹³ to determine those actions that contribute to significant cumulative effects of concern, and add them to the list in Appendix K for consideration in the analysis.

MAPS

Vicinity Map Should Acknowledge Jurisdiction of Trust in Area B

Map 1 in the Maps section of the DEIS indicates the boundaries of various NPS units, state, regional, county and city parks, and other land management agencies in the greater region addressed by the dog management plan. However, the Trust-managed portion of the Presidio (Area B) is left blank, leaving it unclear to the reader as to which agency has jurisdiction over the area. For clarity, the NPS should treat Area B the same way that the GGNRA northern areas (managed by Point Reyes National Seashore) are shown: with a leader line (arrow) followed by the text "Presidio Area B is managed by the Presidio Trust."

FOOTNOTES:

1 Letter of September 20, 2006 from Craig Middleton, Trust Executive Director to Brian O'Neill, former Superintendent, Golden Gate National. Recreation Area. Re: Request for Written Comments on GGNRA Dog Management Plan/EIS.

2 CEQ NEPA Regulations Section 1508.8(b).

3 CEQ Forty Most Asked Questions No. 14b.

4 NPS Management Policies 2006, Section 2, Park System Planning.

5 See CEQ Forty Most Asked Questions No. 23a, Conflicts of Federal Proposal With Land Use Plans, Policies or Controls, which goes on to say: "comments from officials of the affected area should be solicited early and should be carefully acknowledged and answered in the EIS."

6 In fact, the first mention of any regulations on dog walking in Area B appears on page 369, and the oblique reference is only provided to rationalize a finding of no impact to geology and soils.

7 In the notice of its intention to establish the Negotiated Rulemaking Advisory Committee for Dog Management at GGNRA published in the Federal Register on June 28, 2005, the NPS erroneously reported the Trust as a committee member (since respectfully withdrawn) that would represent "the interests of local government."

8 16 U.S.C. 460bb appendix.

9 CEQ Handbook "Considering Cumulative Effects under the National Environmental Policy Act," January 1997.

10 The CEQ Handbook advises that the "first step in identifying future actions is to investigate the plans of... other agencies in the area."

11 See 40 C.F.R. 1502.22, Incomplete or unavailable information.

12 \$4.3 million, which represents 42% of the total USPP budget GGNRA-wide in FY2010.

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Dear Superintendent Dean:

I am writing to express concerns that I have with the draft rules for dog management at the Golden Gate National Recreation Area (GGNRA) in San Francisco and San Mateo Counties. As you know, when Congress created the GGNRA nearly forty years ago, it intended to not only preserve and support the unique park space but also maintain the historic recreational and educational opportunities that residents of the San Francisco Bay Area had traditionally enjoyed. This park is unique from others in our nation as it is truly an urban space. As you move forward with the proposed rule, I urge you to not only address the concerns that my constituents have raised, but make every effort to protect both the environmental characteristics that are unique to this park and the historic recreational uses that the residents in this region rely on.

As you know, two of the communities in my district, Montara and Moss Beach, border Rancho Corral de Tierra, a wonderful property that spans more than 4,000 acres which many of my constituents visit on a daily basis. For decades, residents of the region have been stewards of the land and truly consider it to be part of their own backyards. The area is regarded as dog friendly, largely because of the numerous trails available for dog walking. I understand that because ownership of the land is only now in the process of being transferred to the GGNRA, the draft dog management rules do not address the region. Therefore, the space will be classified as "new lands" when the proposed rules takes effect and dogs would be prohibited, absent a compendium from you determining otherwise. I urge you to consider all options available for this land after the transfer is complete and reject the default dog prohibition. Further, just as the public has had an opportunity to comment on all property affected by the dog management plan, so too should the residents who frequent this property. Thus far they have been denied the option to contribute to the public process because the land has not been under GGNRA ownership. They must be afforded the chance to actively participate in the process and a solution must be crafted which both protects the unique environmental aspects of the park while preserving recreational usage.

I am also concerned about the severity of the Ocean Beach preferred alternative, As you know, the proposed policy would only permit dogs off leash in the one mile area north of stairwell 21.

Dogs will be completely restricted from the entire beach which is south of this marker ' a 2-mile stretch that many of my constituents regularly visit with their dogs. I appreciate the rationale that the Snowy Plover frequent this area and have been disrupted by the dogs, but ask that you consider all less restrictive means that would still protect this endangered species. Might you designate an area within this zone where birds are not as prevalent which can be set aside for off leash use? Please evaluate this and any other plausible alternatives that would both accommodate the dog walkers who utilize this stretch of beach while protecting the Snowy Plover.

Lastly, many of my constituents regularly visit the Fort Funston beach area with their dogs and are concerned with the preferred alternative restrictions. While I join them in commending the fact that the proposal would maintain the beach area as off leash, I ask that you reexamine the plateau area restrictions. Specifically, commercial dog walkers and non-commercial dog walkers alike have shared with me that they would like the open field area just north of the drinking fountains to remain off leash, rather than prohibited to dogs altogether, as the plan proposes. As you know, dogs would benefit most from the span if they are able to run around off leash and this space has been historically used for that purpose. In addition, many of my constituents are concerned that the preferred alternative would require dogs to be on leash on both beach access trails, and that this could impose a safety risk due to the steep decline. I urge you to reevaluate this proposal so that it is more logistically sound.

The issues that I have raised are certainly not exhaustive of those presented by my constituents but are rather those of greatest concern. I am pleased that you have promised to review and adequately respond to the comments you have received from the public during this period and I expect that my constituents will have their voices heard through that process. Furthermore, I view this as only the first step in what is a very important democratic exercise. To that end, I look forward to reviewing the draft rule later this year, including any revisions extracted from the submitted comments.


As you know, the lands that make up the GGNRA are invaluable to the people of our region. I commend you for taking steps to protect the endangered wildlife and the precious environment. I also thank you for your fair and full consideration of the issues my constituents have raised.

All the best,
Jackie Speier
Member of Congress

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Correspondence: 4691

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Correspondence Text

Dear Mr. Dean:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the above project. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The National Park Service (NPS) has developed a Dog Management Plan that is intended to provide clear, enforceable policy regarding the manner and extent of dog use on Golden Gate National Recreation Area (GGNRA) lands. The proposed Plan and Draft EIS describe six alternatives for each of twenty-two locations for the management of dog activities in San Francisco, Marin, and San Mateo Counties, and detail the resources that would be affected at those locations. NPS has identified, for each site, a preferred alternative that is expected to minimize environmental impacts to endangered species such as the snowy plover and mission blue butterfly, decrease disturbance of soils and vegetation, and protect water quality of lagoons, creeks, and wetland habitats.

EPA recognizes and appreciates the need to manage recreational use of GGNRA lands in order to protect sensitive resources, and the difficulty of balancing the often competing goals of conservation and public access. We support the imposition of reasonable restrictions on dogs where necessary and appropriate. From the perspective of protecting resources within the GGNRA, the proposed action has many clear benefits; however, we are concerned that the Draft EIS does not fully address the potential impacts on resources outside of the GGNRA, as well as some impacts, within GGNRA boundaries.

Based on our review, EPA has rated the document Environmental Concerns- Insufficient Information (see enclosed "Summary of EPA Rating Definitions"). We believe that the Draft EIS presents an insufficient analysis of the proposed Plan's indirect impacts on city, county, and State parks, as well as GGNRA lands. Additional analysis should be conducted to identify the locations outside of the subject GGNRA lands that are most likely to receive greater use by current GGNRA users seeking alternate recreational areas for their dogs, and to evaluate the likely impacts of increased use of such alternate areas by such individuals and their dogs. EPA recommends that, in the Final EIS, NPS 1) identify locations of

parks that are likely to receive increased visitation, 2) identify the resources at these locations, and 3) discuss more thoroughly the potential induced impacts on these resources.

For most of the GGNRA locations, the Draft EIS identifies at least one city, county or State park that may receive increased visitation as a result of implementing the preferred alternative. These parks appear to have been selected based primarily on geographic proximity to the GGNRA location. Proximity may not always be the determining factor for where a person will choose to walk his/her dog. In the Final EIS, NPS should include the reasoning used in identifying locations that may experience induced visitation, considering factors such as types of recreation available (trails, roads, off-leash, on-leash), types of habitat and terrain (beach, forest, scrubland, hilly, flat), the availability of water for drinking or water play, the availability of nearby parking, the presence or absence of poison oak, etc., in addition to proximity. Surveys of current GGNRA users with dogs may be useful in identifying the alternate areas most likely to be visited. The Final EIS should identify the parks most likely to receive increased visitation, particularly near high-use GGNRA locations where there would be restrictions or concentrated dog recreation, including Muir Beach, Crissy Field, Baker Beach, Ocean Beach, and Fort Funston.

The Draft EIS does not identify the types of resources that are likely to be adversely affected as a result of indirect impacts. For many of the GGNRA locations, the document states that the types of resources present at the potential alternate parks are unknown. Some of the alternate parks contain water bodies, vegetation, anti/or wildlife that could be affected by increased dog use. Other resources or values that may be affected include visitor experience or human health and safety. EPA encourages NPS to identify more thoroughly those resources on which indirect impacts will occur.

Finally, the Draft EIS does not sufficiently identify and analyze impacts on the resources at locations likely to receive increased visitation. For some GGNRA locations, such as Mori Point for example, the Draft EIS states that water quality (p. 529), vegetation (p. 671), and wildlife (p. 963) at adjacent sites could receive indirect impacts as a result of implementing the preferred alternative, but that any impacts to those resources are expected to be negligible. No information or documentation is provided to support this conclusion for Mori Point, nor for many of the other locations that would experience changes in dog use as a result of implementation of the preferred alternative. The Final EIS should describe the likely impacts on areas expected to receive increased use and explain how they were determined.

Although, on the whole, EPA expects that the proposed action would be beneficial to GGNRA lands and resources, potential adverse impacts are not limited to other parks, but also include some GGNRA lands. For example, the document states that the preferred alternative for Muir Beach "provides 'a no-dog experience on the beach and those visitors looking for a southern Marin beach for dog walking could go to Rodeo Beach'" (p. 104). Therefore, it is reasonably foreseeable that Rodeo Beach will experience indirect impacts as a result of restrictions at Muir Beach. The DEIS does not analyze the impacts to Rodeo Beach that would be expected from eliminating dog recreation on Muir Beach, which is a "high on weekends" visitor use area (p. 271). This is particularly notable given that Rodeo lagoon has occurrences of federally-endangered tidewater goby.

The DEIS identifies numerous city, municipal, and State parks in the Bay Area that provide opportunities for recreation with dogs; however, many of them are located at substantial distances from GGNRA locations where restrictions would occur. It may not be necessary to fully analyze potential indirect impacts at all of the identified parks. Some city and local parks do not have sensitive resources such as wetlands, coastal dunes, or endangered species, and some city and local parks would not expect increased visitation as a result of the proposed action. Some GGNRA lands are identified as low-use areas and may have negligible displaced impacts. However, a fuller analysis of reasonably foreseeable impacts where they would be most likely to occur should be provided in the Final EIS. Some potential indirect impacts that should be more thoroughly investigated include impacts to water quality, vegetation, wildlife, and park maintenance needs; changes in vehicle miles traveled to access recreational sites; dog waste management;

visitor use experience; and increased or concentrated erosion.

EPA encourages NPS to continue to work with cities in Marin, San Francisco, and San Mateo to resolve conflicts, address community concerns, and increase public understanding of the need and basis for the proposed action.

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

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

Enclosures: Summary of EPA Rating Definitions

PEPC Project ID: 11759, DocumentID: 38106

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Correspondence Text

May 30, 2011

Frank Dean
General Superintendent
GGNRA, Building 201
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San Francisco, CA 94123

RE: GGNRA DRAFT DOG MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT

Dear Superintendent Dean:

As the State Senator representing the 8th District in California, which includes much of the Golden Gate Natural Recreation Area (GGNRA), I am writing this letter of public comment as a reflection of my constituents' concerns.

As a general principle, I understand the need to address the difficulties the GGNRA has encountered in managing the area and balancing the interests of preservation and recreation. Given the long history of controversy, I am supportive of the effort to modernize the GGNRA's management policy so as to best protect sensitive lands and species and balance this with recreational use of the area.

I am interested in resolving the issue in a way that collaboratively considers both environmental and recreational factors. I believe a balanced final resolution reached through collaboration is an important goal not just as a matter of policy, but as a key peacemaking tool in resolving this historically emotional and hotly debated issue in San Francisco.

I have two significant concerns with the GGNRA Draft Dog Management Plan/Environmental Impact Statement (hereafter "draft plan") that I believe should be addressed in the GGNRA's revised plan.

1) Compliance-Based Management and Public Comment

Based on constituent concerns and on information obtained through stakeholder meetings, I am concerned the compliance-based management strategy does not yet a) include a proposed system

monitoring and implementation, or b) adequately incorporate the principles of public involvement and comment in policy changes. Compliance with the eventual final version of the plan will undoubtedly be difficult; however, an open, transparent, collaborative approach will ultimately create far better results-better strategies, better compliance, better protection of sensitive species and habitats, and better community relations. A heavy-handed approach, or even the perception of such, will only perpetuate the current controversy-and it appears the lack of a proposed implementation plan for the compliance-based management proposal has already created that effect. The GGNRA must go through an open, public process with stakeholders to construct that plan for compliance management, and I encourage the GGNRA to further consider alternatives to the current compliance-based management proposal that would better incorporate public collaboration in assessing and improving compliance outcomes.

2) Consideration of Impact on City Parks

The draft plan does not adequately consider or evaluate potential impacts on city parks. Rather, the draft plan appears to concentrate on economic factors such as impacts on nearby businesses and commercial dog walking, while grazing over potential changes in park use behaviors and the effect on city parks. The ultimate conclusion that the "potential impacts on social and economic conditions [in San Francisco] would be highly unlikely to exceed a 'negligible' threshold, and are therefore eliminated from detailed consideration" (1) is incomplete and inadequate.

I believe the GGNRA is mistaken and misguided in its reasoning on this point, and that the impacts on city infrastructure should be fully evaluated and addressed in the revised plan.

It is reasonable to assume that potential consequences of dog management policies within one jurisdiction will indeed affect the other. The draft plan itself states that "visitation data on local visitors walking their dogs off-leash in the park are not available; however, reports from park staff suggest that use of GGNRA by dog walkers has been increasing as regulations limiting or prohibiting off-leash dogs in areas managed by other agencies have been increasingly enforced." (2) It must then be recognized that the same will hold true if the GGNRA itself limits allowance of off-leash dogs.

Limiting assessment of impacts on the city to the socioeconomic effects of changing spending patterns of visitors is shortsighted. The potential effects on the city extend far beyond that-specifically, the financial strain on city infrastructure to accommodate potential increased use of city parks. With over 100,000 dogs in San Francisco, there will be impacts-but without appropriate assessment, we cannot determine to what degree the city's infrastructure will be affected. Without that information, the City cannot adequately prepare itself to deal with or mitigate any impacts ? large or small.

It is not smart public policy to consider impacts of this proposal within silos of governmental jurisdiction. The public does not perceive the world through federal versus local lenses, and public perception and buy-in are essential to a consensus outcome on this issue.

The only responsible action is for the GGNRA and the City to jointly assess the potential impacts and consider how best to holistically manage the potential migration of dog activity between the GGNRA and city parks. I respectfully request this be included in the GGNRA's revised plan.

Respecting The Process

The most important and most useful tool in achieving the ultimate goal of a consensus resolution is a fair, open, transparent, collaborative rulemaking process. A collaborative problem-solving approach is indeed more difficult when there is a high level of disagreement amongst affected parties and stakeholders-but that is precisely why that approach is most necessary in order to achieve long term resolution. I appreciate that the GGNRA embraced that idea and attempted to go through the negotiated rulemaking process. While that effort was not successful, I encourage the GGNRA, in its ongoing efforts to be open, public, and fair, to continue to be as collaborative as possible as this process moves forward given the

controversial nature of this issue.

I also encourage the GGNRA to extend that spirit of collaboration and work with the City to resolve this issue. The GGNRA, though federally operated, is a partner in the San Francisco community. To transfer responsibility of dealing with this problem to the city without assisting in an assessment of and plan to deal with it would be irresponsible and, more importantly, would not solve the problem.

Sincerely,

Senator Leland Y. Yee, Ph.D.
California State Senate, District 8

(1) GGNRA Draft Dog Management Plan/Environmental Impact Statement, Vol. 1, p. 23.

(2) Ibid, p. 23.

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Dear Friends at GGNRA ?

I am writing to you as the Governor's appointee to the 3rd Supervisorial District of the County of Marin, formerly held by the late Charles McGlashan. I also live in Sausalito and am a longtime Southern Marin resident. I do not envy you this particular task, and I offer comments that have been gleaned from many conversations with Southern Marin residents regarding the proposed dog leash regulations.

I have great respect for the need to preserve and restore this treasured recreation area in the midst of a bustling urban center, and think that most of the proposed changes strike a reasonable balance between what the strict environmental protectionists would want on the one hand and what the dog lovers would want on the other.

The following general comments apply to the proposal overall:

1. Continuous trail loops will encourage more active engagement with the environment while exercising. Many people, especially those who are aging, walk their dogs on trails such as this as their main exercise. We are all working towards similar goals of a healthier and more vibrant community and loop trails would serve those goals.
2. Education and signage: Education and explanatory signage will go a long way towards the goal of keeping dogs out of sensitive habitat. Most people want to do the right thing, they just need to understand the details of habitat protection. Making it clear that people AND dogs must stay on trails and roads and avoid going cross country should be enforced throughout the area. (This seems particularly apropos of the Homestead Valley alternatives.)
3. Specific times for ROLA would allow some flexibility and would create optimum visitor experiences for those with and those without dogs.

We also would like to make a few specific points on behalf of the constituents on this side of the bridge:

Oakwood Valley Fire Road and Oakwood Valley Trail to Alta Trail: The most striking concern here is the gated and fenced dog run concept. We have heard anecdotally from several members of the "Dog Tech" subcommittee (Roger Roberts, Capt. Cindy Machado, Jane Woodman and Sonya Hanson, among others)

that there was in fact not consensus regarding this ? and the 'assent' that was heard at the meeting was meant to be ironic. The gated and fenced idea seems to run contrary to the hoped for experience that being out in nature would provide.

We would request that the Oakwood Valley Fire Road and the Oakwood Valley Trail be a continuous loop with 'dogs on leash' at a minimum (off leash would be preferable) and that the connector to the Alta Trail and up to Donahue be designated as 'dog-friendly', as well. It would be preferable to leave this trail available for dogs along its entirety, creating a loop that can be accessed from several different points (Tennessee Valley Rd, Donahue St. and the Orchard Fire Rd). Please note that there is the appearance of an equity issue here, as the trail is primarily accessed at the top of Donahue in Marin City. This is a community with some of the highest rates of heart disease, diabetes and childhood obesity in Marin. Having this loop accessible to all ages in this community, and especially children, is seen as a critical component to creating a healthy community.

Marin Headlands: Again, we would like to suggest that as many loops be created as possible with fewer dead-end trails. It would certainly be acceptable to have both off-leash and on-leash areas, but it seems that dogs on leash should be allowed on sidewalks and roads. For instance, the intersection of the Rodeo Valley Trail could be connected at McCullough to the Coastal Trail, which would provide a great deal of variety and options for trail choice.

We hope that NPS will continue to make the recreation area as accessible to all as possible. In reviewing the Transportation Plan, it is clear that getting people out of their cars and out into nature is the goal, which we applaud. While we strongly support protecting vulnerable habitat, we are concerned that the current plan would leave Muir and Rodeo as the only beaches in the Marin portion of the GGNRA where dogs would be allowed.

Fort Baker: Please consider including the Parade Grounds, Drowns Fire Road and East Road for dogs on leash.

I think the vast majority of dog owners are good citizens and strive to make sure that their canine companions are good citizens, as well. Try as we might, there will always be the rare bad actors and bad visitor interactions. Making it clear where dogs are prohibited gives the "no dogs" visitor the option to be in a 'dog-free' zone, and fair warning on other trails that they are likely to encounter dogs there. Similarly, dog owners can feel comfortable that they can enjoy time outdoors in this splendid and treasured place on trails where they are indeed welcome.

Thank you for considering these points. I look forward to seeing the comments once you have collected them all. As I said at the top of this letter, I do not envy you this task, but very much appreciate your dedication to improving the experience for all.

Best regards,

Kathrin Sears

PEPC Project ID: 11759, DocumentID: 38106

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Dear Superintendent Dean:

I write to offer SF Animal Care & Control's comments on the National Park Service's Draft Environmental Impact Statement for Dog Management (Plan/DEIS) for the GGNRA. As you are aware, SF/ACC is responsible for stray or unwanted domestic animals and finding them new homes, but we also provide rescue and facilitate wildlife rehabilitation for sick, injured and orphaned animals throughout San Francisco. Accordingly, we are an advocate for dogs (and off-leash exercise) as well as for other animal welfare issues including respect for and coexistence with local wildlife.

The Plan/DEIS expresses' an intention to ensure the protection of natural, cultural and recreational resources of that land. The primary supporters of the Plan/DEIS share our concerns about the impact on native wildlife. However, the Plan/DEIS lends itself to an interpretation that polarizes advocates on either side by pushing them to choose advocacy for dogs or that of natural resources. SF/ACC does not agree that a dog management plan has to invoke an either/or situation. We share the advocates' concerns about wildlife and other environmental impact. However, the EIS document presented by the NPS does not clearly demonstrate that the presence of off-leash dogs is the sole, or even primary, cause of damage to native species or wildlife. The EIS document lacks foundation or analysis about the cause of any such impact. The mere fact of off-leash dogs being present does not lead to an automatic conclusion that those dogs have impacted an area that is also frequented by people without dogs or people with dogs on leash, horses, hang gliders, the Park Service Ranger's ATVs, or other predatory wildlife.

The NPS preferred alternative with restrictions and a compliance based enforcement that could ultimately lead to an outright ban prohibiting dogs from being allowed on GGNRA property altogether does not contemplate the urban environment in which those lands sit or the interests of the people of San Francisco and the Bay Area. Moreover, this position is overly restrictive given that the NPS has not taken any intermediate steps to educate the public and users about what is required for coexistence and collaboration. In fact, the limited education that has taken place has been initiated by local dog organizations interested in preserving their access to the off- leash areas. It seems that the NPS has not attempted to implement other, less restrictive options at their disposal prior to proposing significant

limitations. For example, the NPS could implement an adaptive management plan that might include signs, timed use, fencing, and/or' enforcement of local or state laws similar to our local pooper scooper law, licensing laws or permitting options. Taking such steps would indicate openness to our community's concerns and to our unique Bay Area environment.

After several meetings with you and GGNRA Director of Communications Howard Levitt, we heard and even share your concerns about visitor and employee safety, wildlife protection, and maintaining resources for future generations. We would like to continue to work with you on solutions that would allow for more flexibility in coming up with a plan that addresses the needs of San Francisco residents, both human and non-human. Peaceful coexistence requires understanding and movement from both sides and is the only way that a City like San Francisco, with such diverse interests, can seek solutions to our challenges.

Yours very truly,

Rebecca Katz

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Dear Mr. Dean:

Subject: Golden Gate National Recreation Area Dog Management Plan/Draft Environmental Impact Statement, Marin, San Francisco and San Mateo Counties

The Department of Fish and Game (DFG) has reviewed the Golden Gate National Recreation Area (GGNRA) Dog Management Plan draft Environmental Impact Statement (EIS) and appreciates this opportunity to convey our comments.

National Park Service Preferred Alternatives

DFG recognizes the lengthy and on-going public decision making process conducted by the GGNRA in preparation of the draft EIS. In general, DFG believes that the National Park Service (NPS) Preferred Alternatives represent a reasonable consideration of biological resources in balance with other demands on GGNRA lands. DFG recognizes that the Environmentally Preferable Alternative (Alternative D) was selected for many sites as well as for New Lands. DFG also recognizes that in several cases where the NPS Preferred Alternative is other than the Environmentally Preferable Alternative, the NPS Preferred Alternative is indistinguishable from the Environmentally Preferable Alternative with respect to effects on wildlife. In general, DFG appreciates this opportunity to communicate our overall support for the project as proposed in the draft EIS. We encourage GGNRA to consider the following site-specific comments in preparation of the final EIS.

In cases where Alternative D is not the selected alternative, it is unclear if the Park Stewardship Programs Initiative projects will truly offset the differences in impacts between the selected Alternative and Alternative D as it appears that the implementation of these programs is unrelated to the Alternative adopted. It generally appears that the adoption of Alternative D is most consistent with the overall success of these projects.

Oakwood Valley

The NPS Preferred Alternative (Alternative C) differs from the Environmentally Preferable Alternative in the designation of a regulated off-leash area (ROLA) on the Oakwood Valley Fire Road. Under

Alternative D, dogs would be required to be leashed. As stated in the draft EIS, the adoption of Alternative C at this site is likely to result in minor adverse impacts to vegetation. DFG recommends that Alternative D be selected as the adopted alternative as it, by requiring dogs to be leashed on the fire road, would largely avoid impacts to vegetation which may result from trampling, digging, and waste.

Rodeo Beach/South Rodeo Beach

The NPS Preferred Alternative (Alternative C) differs from Alternative D in the designation of an extensive ROLA on Rodeo Beach which under the Alternative D would be split between areas designated for on-leash recreation and areas closed to dogs. Within the ROLA, permit holders would be allowed to have up to six dogs off leash. As stated in the draft EIS, the adoption of the Alternative C at this site is likely to result in moderate adverse impacts to coastal foredune vegetation due to the large size and location of the ROLA, resulting in long-term adverse impacts to marine mammals and birds. DFG recommends that Alternative D be selected as the adopted alternative as it, by a combination requiring dogs to be leashed and prohibiting dogs from portions of the beach, would avoid impacts to vegetation which may result from trampling, digging, and waste and avoid impacts to marine mammals and birds which may result from repeated flushing, barking, biting, or other pursuit or contact.

Crissy Field

The NPS Preferred Alternative (Alternative C) differs from the Environmentally Preferable Alternative in the designation of a ROLA along the shoreline of Central Beach. Under Alternative D, dogs would be prohibited in this area. As stated in the draft EIS, the adoption of Alternative C at this site is likely to result in minor adverse impacts to coastal dune vegetation; long-term moderate adverse impacts on shorebirds, gulls, terns and marine mammals; and long-term adverse impacts to the federally threatened western snowy plover. DFG recommends that Alternative D be selected as the adopted alternative as it, by prohibiting dogs from the Central Beach shoreline, would avoid impacts to coastal dune vegetation which may result from trampling, digging, and dog waste; impacts to birds which may result from repeated flushing; impacts to marine mammals which may result from biting, barking, or physical contact; and impacts to snowy plover which may result from harassment, including interruption of foraging and roosting behavior.

Ocean Beach

The NPS Preferred Alternative (Alternative C) differs from the Environmentally Preferable Alternative in the designation of a ROLA on the beach north of Stairwell 21. Under Alternative D, dogs would be required to be leashed in this area. As stated in the draft EIS, the adoption of Alternative C at this site is likely to result in minor adverse impacts to beach vegetation, long-term moderate adverse effects on shorebirds, gulls, and terns and marine mammals, and potentially limit use of preferred habitat by the federally threatened western snowy plover. DFG recommends that Alternative D be selected as the adopted alternative, as it, by requiring dogs to be leashed north of Stairwell 21, would avoid impacts to birds which may result from repeated flushing; impacts to marine mammals which may result from biting, barking, or physical contact; and impacts to snowy plover which may result from harassment.

Fort Funston

The NPS Preferred Alternative (Alternative C) differs from the Environmentally Preferable Alternative in the designation of a ROLA on the beach south of the Beach Access Trail and designation of a ROLA between the parking lot and Sunset Trail. Under Alternative D, dogs would be required to be leashed on the beach, dogs would be excluded off-trail between the parking lot and Sunset Trail, and a ROLA would be established at a site adjacent to the Habitat Protection Area. As stated in the draft EIS, the adoption of Alternative C at this site is likely to result in minor adverse impacts to coastal dune vegetation, long-term major adverse impacts on wildlife, and long-term minor-to-moderate adverse impacts to San Francisco

lessignia. DFG recommends that Alternative D be selected as the adopted alternative, as it would, by requiring dogs to be leashed on the beach and excluding dogs off trail between the parking lot and Sunset Trail, avoid impacts to coastal dune vegetation and San Francisco lessignia which may result from trampling, digging, and dog waste; impacts to birds which may result from repeated flushing; and impacts to marine mammals which may result from biting, barking, or physical contact.

If you have any questions, please contact Mr. Richard Fitzgerald, Coastal Habitat Conservation Supervisor, at (707) 944-5568; or Mr. Scott Wilson, Environmental Program Manager, at (707) 944-5584.

Sincerely,

Carl Wilcox
Regional Manager
Bay Delta Region

cc: State Clearinghouse

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Dear Superintendent Dean:

I am writing to provide comments on the Draft Dog Management Plan/DEIS. The members of the GGNRA Liaison Committee of the City of Pacifica discussed this document with GGNRA representatives as well as those citizens who have provided comments to the Committee to understand the context and content of the DEIS with special emphasis on affected lands in Pacifica.

At their regular meeting of May 23, 2011, the City Council held a public hearing, reviewed and deliberated on the comments relating to the Draft Environmental Impact Statement for Dog Management in GGNRA lands within the limits of the City of Pacifica, and voted unanimously to submit the following comments:

Multimedia Approach to Public Education in Pacifica:

Despite the considerable publicity surrounding the DEIS and potential dog management rule changes coming, there will always be a subset of the public that will be caught unaware when these changes are implemented. We request the GGNRA employ their skills at outreach and education by adopting a multimedia approach and avail themselves of the many informational options available in Pacifica for outreach (e.g. newspaper, television, web sites, clubs/organizations, meetings etc.).

Rule Compliance and Enforcement Should Include a Tiered Approach:

It is our understanding there will be a compliance component including the option to increase overall restrictions at a given site if compliance drops below a defined threshold (e.g. dogs in an on-leash area may become a no dogs allowed area). We also expect that eventually, in the extreme, the possibility will exist of issuing citations to individuals in violation of the regulations. We would hope that such compliance and eventual enforcement actions will include a tiered approach with a sufficient period of informal warnings to ensure all park users are aware of the management changes. We encourage the GGNRA to work with local dog organizations (e.g. POOCH) with regard to prior outreach and education, as well as monitoring efforts, to evaluate compliance once the regulations are implemented.

Clear Signage at Enforcement Transition Zones:

There are a number of locations where there is a transition between GGNRA and City- managed lands. Without clear and prominent signage a person walking a dog may suddenly find they are no longer on City property but GGNRA land and in violation of the new regulations. An example of such a transition zone is at the south end of the berm (owned by the City of San Francisco but managed and used by Pacificans) which transitions seamlessly into GGNRA Mori Point land. Therefore we encourage GGNRA to clearly post these transition zones.

Site-Specific Comments

The following are comments specific to the "alternatives" presented by the DEIS plan for lands in Pacifica. Map references refer to maps of the various "alternatives" for each location. In most cases we select a particular map "alternative" modified by the inclusion of certain trails. Our overall rationale for suggesting these changes include: 1) the need for more recreational access on GGNRA lands for on-leash dog walkers in Pacifica including loop trails and access to and from neighborhoods or open space areas exhibiting high visitor volume; 2) the belief that these changes are compatible with maintaining ecosystem integrity; 3) our Committee members' observations that under controlled conditions, on-leash dog access to open space has not always, over the past decades, degraded habitat integrity; and 4) concerns that the site use restrictions proposed in the DEIS will cause negative effects from the pressures for other outdoor dog-related recreation.

Sweeney Ridge:

Map 19E should include on-leash access for the Baquiano and Sneath Lane/NPS Easement Trails. We suggest that the thick chaparral on the Baquiano side and the fact that the Sneath Lane/NPS trail is paved would prevent most if not all dogs from accessing the property off the trails (in the event there is non-compliance with the leash law). Proper enforcement of the rules should ensure that few if any violations occur, in which case the environmental effects from site access on this parcel would be minimal.

Milagra Ridge:

No Comment.

Mori Point:

We suggest that the trails designated on Map 17C as "Tmigtac" and "Polywog" trails be modified to allow on-leash dog access. We believe the likelihood of either the red-legged frog or the San Francisco garter snake being harmed or negatively affected is extremely remote. Furthermore, the "Polywog" trail is an example of where it is important to maintain neighborhood access from Old Mori Point road to Fairway Drive. This trail runs parallel to a long fence line and is clearly not a species migratory corridor.

Pedro Point:

Map 20C was lacking detailed trail maps making it difficult to evaluate these options. The GGNRA has access to the publically vetted trails map that was created through a cooperative effort of the Pacifica Land Trust and the National Park Service. We suggest incorporating the trails map from that effort as a starting place for discussion of possible on-leash dog access on Pedro Point. It seems reasonable to assume that as soon as the Devils Slide tunnel is open and the segment of Highway 1 between the two portals is abandoned and turned over to public foot and bicycle access, Pedro Point will become a popular destination. If that is a valid assumption, the public will seek access to the site with their dogs. We suggest adding the proposed trail network from the Pacifica Land Trust grant effort to more definitively establish what forms of dog access might be possible in advance of the actual transfer to the GGNRA (which has been pending for many years). It seems reasonable to consider on-leash access from the old parking area up the south ridge, north to the middle ridge, and then back to the east via the ridge or the valley trail

between those two ridges.

Future Considerations

The City Council established the GGNRA Liaison Committee with one of its goals being to promote the economic interests of the City with respect to open space by promoting hiking, bicycle riding, bird watching, and other recreational uses compatible with maintaining park resources. We are concerned that a loss of on-leash dog access on lands within Pacifica might have unwanted economic consequences, as dog walkers will go elsewhere, effectively eliminating the possibility of patronizing Pacifica's restaurants, hotels, or other retail outlets. While this cannot be readily quantified, we wish to express our concerns about this possibility, as it has been the City's long-held desire to see just the opposite occur. Our partnership with the GGNRA has been premised on the mutual benefits that Pacifica and the National Park Service can have from expanded open space. These are benefits that extend to both the human and natural environments. We have expected to see increased visitation, possibly the expansion of a visitor center, and habitat improvements (such as have occurred much to your credit at Mori Point) lead to enhanced economic circumstances in Pacifica. While this remains possible, we encourage you to consider these effects while making final evaluations of the proposed actions in the DEIS.

Last, there is the issue of exploring sites within or adjacent to the City of Pacifica. Many citizens have asked if there could be some place in this vast park, and specifically in or near Pacifica, where the GGNRA can establish an off leash area (e.g. land at Shelldance entrance adjacent to Highway 1). We would like to extend the resources of our City staff and the Liaison Committee to assisting the GGNRA in identifying such a location and how it could be managed in a manner consistent with the other off-leash areas under consideration in the DEIS.

We thank you and your staff for your dedication and hard work. We continue to be grateful for all that you have done and continue to do for the advancement of park lands in and near Pacifica.

Sincerely

Mary Ann Nihart
Mayor

cc: Council Members Pete DeJarnatt, Sue Digre, Jim Vreeland, and Len Stone
Paul Jones, Co-Chair, GGNRA Liaison Committee


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Correspondence Text

Dear Superintendent Dean,

Attached please find the Congresswoman's comment letter on the GGNRA dog management plan that she would like to officially submit for processing. She asked that I thank you for taking the time yesterday to talk through a number of the issues; it was helpful to her evaluation.

Please let me know if you have any questions.

Enjoy your weekend, Alana

Alana Paull, Esq.

Senior Legislative Assistant

Office of Congresswoman Jackie Speler

400 S. El Camino Real, Suite 410

San Mateo, CA 94402

Dear Superintendent Dean:

I am writing to express concerns that I have with the draft rules for dog management at the Golden Gate National Recreation Area (GGNRA) in San Francisco and San Mateo Counties. As you know, when Congress created the GGNRA nearly forty years ago, it intended to not only preserve and support the unique park space but also maintain the historic recreational and educational opportunities that residents of the San Francisco Bay Area had traditionally enjoyed. This park is unique from others in our nation as it is truly an urban space. As you move forward with the proposed rule, I urge you to not only address the concerns that my constituents have raised, but make every effort to protect both the environmental characteristics that are unique to this park and the historic recreational uses that the residents in this region rely on.

As you know, two of the communities in my district, Montara and Moss Beach, border Rancho Corral de Tierra, a wonderful property that spans more than 4,000 acres which many of my constituents visit on a

daily basis. For decades, residents of the region have been stewards of the land and truly consider it to be part of their own backyards. The area is regarded as dog friendly, largely because of the numerous trails available for dog walking. I understand that because ownership of the land is only now in the process of being transferred to the GGNRA, the draft dog management rules do not address the region. Therefore, the space will be classified as "new lands" when the proposed rules takes effect and dogs would be prohibited, absent a compendium from you determining otherwise. I urge you to consider all options available for this land after the transfer is complete and reject the default dog prohibition. Further, just as the public has had an opportunity to comment on all property affected by the dog management plan, so too should the residents who frequent this property. Thus far they have been denied the option to contribute to the public process because the land has not been under GGNRA ownership. They must be afforded the chance to actively participate in the process and a solution must be crafted which both protects the unique environmental aspects of the park while preserving recreational usage.

I am also concerned about the severity of the Ocean Beach preferred alternative, As you know, the proposed policy would only permit dogs off leash in the one mile area north of stairwell 21.

Dogs will be completely restricted from the entire beach which is south of this marker ' a 2-mile stretch that many of my constituents regularly visit with their dogs. I appreciate the rationale that the Snowy Plover frequent this area and have been disrupted by the dogs, but ask that you consider all less restrictive means that would still protect this endangered species. Might you designate an area within this zone where birds are not as prevalent which can be set aside for off leash use? Please evaluate this and any other plausible alternatives that would both accommodate the dog walkers who utilize this stretch of beach while protecting the Snowy Plover.

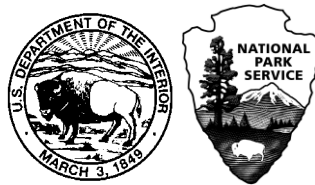
Lastly, many of my constituents regularly visit the Fort Funston beach area with their dogs and are concerned with the preferred alternative restrictions. While I join them in commending the fact that the proposal would maintain the beach area as off leash, I ask that you reexamine the plateau area restrictions. Specifically, commercial dog walkers and non-commercial dog walkers alike have shared with me that they would like the open field area just north of the drinking fountains to remain off leash, rather than prohibited to dogs altogether, as the plan proposes. As you know, dogs would benefit most from the span if they are able to run around off leash and this space has been historically used for that purpose. In addition, many of my constituents are concerned that the preferred alternative would require dogs to be on leash on both beach access trails, and that this could impose a safety risk due to the steep decline. I urge you to reevaluate this proposal so that it is more logistically sound.

The issues that I have raised are certainly not exhaustive of those presented by my constituents but are rather those of greatest concern. I am pleased that you have promised to review and adequately respond to the comments you have received from the public during this period and I expect that my constituents will have their voices heard through that process. Furthermore, I view this as only the first step in what is a very important democratic exercise. To that end, I look forward to reviewing the draft rule later this year, including any revisions extracted from the submitted comments.

As you know, the lands that make up the GGNRA are invaluable to the people of our region. I commend you for taking steps to protect the endangered wildlife and the precious environment. I also thank you for your fair and full consideration of the issues my constituents have raised.

All the best,

Jackie Speier
Member of Congress



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic places, and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for the public lands and promoting citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

(Fall 2013)

United States Department of the Interior · National Park Service