



Appendices

APPENDIX A: 1979 GGNRA ADVISORY COMMISSION PET POLICY



IN REPLY REFER
TO:

United States Department of the Interior

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

A--18

February 24, 1979 xw46

GOLDEN GATE NATIONAL RECREATION AREA ADVISORY COMMISSION

APPROVED GUIDELINES FOR A PET POLICY - SAN FRANCISCO AND MARIN

COUNTY (MUIR BEACH & SOUTH)

1. DEFINITIONS:

a. "Unmanaged" dogs and cats

(1) Feral dogs and cats. Those dogs and cats having escaped domestication and become wild.

(2) Those dogs not supervised by their owners.

b. "Managed" dogs: Those dogs under control of their owner at all time's. This control may be by voice or by leash. The criterion is that the dog may not harrass any person or animal.

c. Voice or leash control: This is a flexible system. The success of such a system is dependent upon the willingness of visitors and local residents to cooperate with GGNRA personnel, and the willingness of GGNRA personnel to manage dogs, people and wildlife situations; to enforce regulations; and to cite violators.

2. GENERAL POLICY:

a. Unmanaged animals are not allowed in GGNRA. Every effort should be made to apprehend "unmanaged" animals because of potential danger to visitors and wildlife. (Exception: "Cat Colonies") The Code of Federal Regulations (CFR 2.8 (d) states: "Dogs, cats or other pets running at large and observed by an authorized person in the act of killing, injuring or molesting humans or wildlife may be disposed of in the interest of public safety and protection of the wildlife." If the dog's owner is found, the owner should be cited and fined. If the dog's owner cannot be found, the dog should be sent to the local humane Society.

b. Licensing laws. If a person and a dog come from San Francisco or Marin County, the dog must have the appropriate license. If the person and dog come from out-of-town, the dog must conform to licensing practices where the dog resides.

Implementation of these laws should conform with regulations to be developed by the National Park Service Field Solicitor's office (attorney)- They should be posted in appropriate places throughout the park.

POLICY - MARIN COUNTY

Advanced Dog Training Area. That portion of former Whitegate Ranch bounded by Panoramic Highway, State Route 1, and Mt. Tamalpais State Park, and southwest of Panoramic Highway is designated as a dog training area for advanced training. Use is restricted to owners and dogs which have successfully completed basic obedience training and are in the process of advanced obedience or special skills training. Trainers utilizing this area should identify themselves by wearing a fluorescent orange armband. Use of the area by dogs not in advanced training will be considered a violation of park regulations.

Dog Run Areas. Pets on leash or under voice control are permitted in the following areas: Rodeo Beach at Fort Cronkhite

Muir Beach

4 Corners tract above Mill Valley bounded by State Route 1,
Panoramic Highway, Sequoia Valley Road and Homestead Valley
area

Trails. Pets are permitted on the following trails either on leash or under voice control:

1. Coast Trail, Golden Gate Bridge to junction of Wolf Ridge Trail (Hill 88) Loop trail from parking area up to Pacific Coast trail to paved road near Battery Townsley and return via paved road.
3. Wolf Ridge Trail between Coast Trail and Miwok Trail
4. Miwok Trail between Wolf Ridge Trail and Coast Trail, Fort Cronkhite.
(Trails 1, 3 and 4 provide a loop trail, also known as the Wolf Ridge Loop in "Guide to Golden Gate National Recreation Area" by Dorothy Whitnah, pp. 100-103.)
5. Oakwood Valley Road to Alta Avenue.** (see below)
6. Alta Avenue between Marin City and Oakwood Valley.

Pets on Leash. Pets are permitted while on leash on the following trails: 1. Coast Trail between Hill 88 and Muir Beach 2. Miwok Trail between Tennessee Valley parking area and State Route 1.

Pet owners are responsible for the actions of pets in all areas where pets are permitted. Owners who allow pets to engage in fighting, excessive barking, chasing or disturbance of wildlife., running at large beyond effective voice control or other inappropriate behavior will be considered as being in violation -of park regulations.

No dogs will be allowed in Muir Woods, Audubon Canyon Ranch, Stinson Beach, and in areas where state park regulation conflicts will arise. The Committee will consider the area near Stinson Beach for dog access at the time northern Marin portions of the National Park Service are considered.

There are existing routes to GGNRA from the City of Sausalito which are not readily accessible to residents wanting to hike with their dogs. When future access routes are developed, however, these guidelines will be adjusted to incorporate them.

Appendices

<u>Fort Funston</u>	-No restrictions (dogs under voice control).
<u>Ocean Beach</u>	-No restrictions (dogs under voice control) except that on crowded days, in the seawall area between the Cliff House and Golden Gate Park, visitors may be asked to leash their dogs or move south to less crowded areas.
<u>Sutro Heights</u>	-Dogs on leash with "Please pickup dog litter" signs.
<u>Lands End</u>	-No restrictions. (dogs under voice control).
<u>West Fort Miley</u>	-No restrictions (dogs under voice control) with "Please pick up dog litter" signs.
<u>East Fort Miley</u>	-No restrictions (dogs under voice control). Reconsider after renovation of parking area.
<u>Phelan Beach</u>	-No pets.
<u>Baker Beach</u>	- <u>North beach area:</u> No restrictions (dogs under voice control). <u>South beach area:</u> No pets. <u>Picnic area/Parking lot:</u> Dogs on leash at all times.
<u>Fort Point</u>	-No pets.
<u>Golden Gate Promenade/ Crissy Field</u>	-Signs at entry points to read "DOG OWNERS - Your dog must be under voice-control at all times and on leash in parking and picnic areas."
<u>Fort Mason</u>	-Dogs on leash with "Please pick up dog litter" signs
<u>Aquatic Park/ Victorian Park</u>	-No dogs on beach. Dogs on leash elsewhere with "Please pack up dog litter" ^{4H} signs.
<u>Historic Ships</u>	-No pets.
<u>Alcatraz</u>	-No pets.

CAT COLONIES:

Existing cat colonies on San Francisco GGNRA lands will remain, and are specifically exempted from feral animal policy. We ask for long-term cooperation among the public, the SPCA, and the CGNRA to upgrade cleanliness and insure freedom from disease.

Note: Guide dogs for the blind are exempt from all restrictions.

Approved Jan 10.. 1979

APPENDIX B: GGNRA COMPENDIUM



National Park Service
Department of the Interior

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

(415) 561-4720 phone
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**2016 Superintendent's Compendium
Of Designations, Closures, Permit
Requirements and Other Restrictions
Imposed Under Discretionary Authority**

Approved:

A handwritten signature in blue ink, appearing to read "Christine Lehnertz".

Christine Lehnertz
General Superintendent
Golden Gate National Recreation Area

03.30.2016

Date

In accordance with the regulations and delegated authority provided in Title 36, Code of Federal Regulations, Chapter 1, Parts 1 through 7, authorized by Title 54, United States Code, Section 100751(a), the following regulatory provisions are established for the proper management, protection, government and public use of the portions of Golden Gate National Recreation Area, Presidio of San Francisco - Area A, Muir Woods National Monument, and Fort Point National Historic Site under the jurisdiction of the National Park Service. Unless otherwise stated, these regulatory provisions apply in addition to the requirements contained in 36 CFR, Chapter 1, Parts 1-7.

Written determinations that explain the reasoning behind the Superintendent's use of discretionary authority as required by Section 1.5 (c) appear in this document identified by italicized print.

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PART 1 – GENERAL PROVISIONS

The specific discretionary authority for Park Superintendents to establish reasonable schedules for visiting hours, impose public use limits, and close park areas for all public use or specific use is found at Title 36 Code of Federal Regulations (CFR) §1.5. These park-specific restrictions are also based upon 36 CFR, Chapters 1-7 to protect park resources, visitors and employees. Under CFR §1.7 notice of all restrictions, closures, designations and permit requirements will be made available to the general public by a least one or more of the following methods of notifications: maps, brochures, signs, permits, or other appropriate methods, as well as within this compendium.

Section 1.1 Definitions

The following are terms used in this document. A more complete listing can be found in the CFR derived under 36 CFR §1.4 or §1.5 http://www.access.gpo.gov/nara/cfr/waisidx_09/36cfr1_09.html.

- **BICYCLE** means a device upon which any person may ride, propelled exclusively by human power through a belt, chain, or gears, and having one or more wheels. Persons riding bicycles are subject to the provisions of the CA Vehicle code specified in Sections 21200 and 21200.5.
- **BICYCLE ROUTE** means any lane, way, or path, designated by appropriate signs, that explicitly provides for bicycle travel.
- **COMMERCIAL CARRIER:** Any type of motor vehicle used for commercial transportation service to areas administered by GGNRA, including but not limited to sedans, SUV's, minivans, vans, mini-busses, motor coaches, and limousines used for commercial transportation services subject to authorization. The following exceptions apply in which carriers may use roads within GGNRA without a special CUA; vehicles contracted for use by school programs in NPS areas; vehicles contracted for use by nonprofit organizations' programs in NPS areas; vehicles; taxis; and MUNI or other providers of public transportation.
- **COMMERCIAL TRANSPORTATION SERVICE:** Conveyance of visitors via motor vehicle into and/or out of any area administered by GGNRA for a direct or indirect fee and, except for on-board interpretative services, no other services are provided.
- **COMMERCIAL USE AUTHORIZATION:** A form or written authorization issued by the Superintendent under which persons are allowed to provide certain commercial services to visitors of the GGNRA.
- **ELECTRIC POWERED MOBILITY ASSISTANCE DEVICES** (e.g. electric scooters, Segway® devices) is a motor vehicle as defined in Title 36 CFR. "Electric personal assistive mobility device" or "EPMAD" means a self-balancing, non-tandem two-wheeled device, that is not greater than 20 inches deep and 25 inches wide and can turn in place, designed to transport only one person, with an electric propulsion system averaging less than 750 watts (1 horsepower), the maximum speed of which, when powered solely by a propulsion system on a paved level surface, is no more than 12.5 miles per hour
- **FIRE** means any combustion of combustible materials of any type outdoors.
- **GUIDED SERVICES** means any type of guided commercial activity provided by GGNRA visitors for a direct to indirect fee or charge. This includes, but is not limited to, guided activities such as hiking, bicycling, kayaking, and equestrian activities, education, instruction, and recreation for groups of all sizes.
- **IDLING** means the engine is running while a truck, bus or any vehicle is stationary.
- **KITE BUGGY** means a light, purpose-built vehicle powered by a traction kite (power kite). It is single-seated and has one steerable front wheel and two fixed rear wheels. The use of these devices fall under skateboarding regulations (See skateboard).
- **KITESURFING OR KITEBOARDING** means using a kite to pull a rider through the water on a surfboard or kite-board (a wakeboard-like board). The use of these devices fall under surfing regulations. Other terms used: Windsurfing.
- **MANAGED DOGS** means those dogs under control of their owner at all times. This control may be by voice or by leash, depending on the legal dog walking status of the area visited. The criterion is that the dog may not harass any person or animal.
- **OPEN-TOP COMMERCIAL CARRIER** means a commercial carrier in which all or part of the vehicle roof is removed.

- **ORGANIZED GAMES AND SPORTS** mean recreation that requires the erection of associated equipment, use of uniforms, and/or exclusive use of more than one-third of the designated area or patterns of routine use.
- **OUTDOOR FITNESS** means any type of commercial guided exercise activity provided to GGNRA visitors for a direct to indirect fee or charge. This includes, but is not limited to, fitness instruction, education, and motivational exercises for groups of all sizes.
- **OVERNIGHT PARKING** means a vehicle parking continuously between 12 midnight and 6:00 a.m.
- **PICNICKING** means an excursion or outing in which the participants carry food with them and have a meal in the open air.
- **SERVICE ANIMAL** means any dog or miniature horse that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. Miniature Horses are recognized as SERVICE ANIMALS for the purpose of the definition of Service Animal. (28 CFR Part 35 Section 34.104) Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purpose of this definition. (28 CFR Part 35 section 34.104)
- **AN INDIVIDUAL WITH A DISABILITY** means any person who has a physical, mental, or sensory impairment that substantially limits one or more major life activities, has a record of such an impairment, or is re-guarded as having such an impairment. (43 CFR Part 17.503)
- **PORTABLE FIRE PIT** mean a free standing portable fire basin used with wood or wood products. The use of these devices falls under the 2.13 fire regulations.
- **POWERLESS FLIGHT.** The use of devices designed to carry persons through the air in powerless flight.
- **PUBLIC PIER OR JETTY** is defined in the sport fishing regulations as a publicly owned man-made structure that has the following characteristics: is connected, above the mean high tide, to the main coastline; has unrestricted free access for the general public; and has been built or currently functions for the primary purpose of allowing angling access to ocean waters.
- **SKATEBOARD** means a board having a set of wheels mounted under it or on the side, ridden in a standing, crouching or seated position. Other terms used for extreme sport skating: Mountain-boarding, Roll-surfing, and Dirt-surfing.
- **SKATESAILING** means a sport where people on skates are propelled by a sail. Traditionally ice skates are used, but other kinds, such as roller skates, skateboards, or wheels can be used. Other terms used: Street-sailing, Wind-skating, Sporting-sails and Land-surfing, the use of these devices fall under skateboarding regulations.
- **UNMANNED AIRCRAFT** means a device that is used or intended to be used for flight in the air without the possibility of direct human intervention from within or on the device, and the associated operational elements and components that are required for the pilot or system operator in command to operate or control the device (such as cameras, sensors, communication links). This term includes all types of devices that meet this definition (e.g., model airplanes, quadcopters, drones) that are used for any purpose, including for recreation or commerce.
- **UNMANAGED DOGS** means dogs that annoy, harass, or attack people, wildlife, livestock or other dogs, are presumed to be not under control.
- **VOICE CONTROL** means dogs are within earshot and eyesight of the owner/handler and respond immediately to commands to return to leash when called.

Section 1.2 Applicability and Scope

The regulations and public use limits or restrictions contained in this document apply to all persons entering, using, visiting or otherwise within the boundaries of lands and waters, controlled, leased, administered or otherwise subject to the jurisdiction of the National Park Service, Golden Gate National Recreation Area.

Section 1.5 – Visiting Hours, Public Use Limits, Closures

(a)(1) The following visiting hours and public use limits are established for all or for the listed portions of the park, and the following closures are established for all or a portion of the park to all public use or to a certain use or activity:

What Are The Visiting Hours?

- ☐ The Park is open to visitors every day of the year, 24 hours, except where listed below:
- ☐ **VISITOR CENTERS** hours are as follows:
 - ☐ Marin County
 - Marin Headlands Visitor Center: open year-round from 9:30-4:30 pm (except Thanksgiving and Christmas Day)Muir Woods National Monument Visitor Center: is open year-round from 9am until 5:30pmstarting from the last Sunday in January; 9am until 7:30pm starting from the second Sunday in March; 9am until 6:30pm from the third Sunday in September; 9am until 6:30pm from the second Sunday in October; and from 9am until 4:30pm from the first Sunday in November.
 - ☐ San Francisco
 - Fort Point Visitor Center: open seasonally from November 1 to March 31 Friday-Sunday from 10:00-5:00 pm.
 - Lands End Lookout: open daily from 9:00 am-5:00 pm except Thanksgiving Day, Christmas Day, and one day of annual inventory (September 31st or October 1st).
 - Golden Gate Bridge Pavilion: open daily from 9:00 am-6:00 pm except Thanksgiving Day and Christmas Day
- ☐ **DAY USE:** The following areas are closed between one hour after sunset until 6:00am:
 - ☐ Marin County
 - Conzelman Road: Closed to motorized vehicle traffic from its junction with McCullough Road traffic circle, westward to its junction with Field Road.
 - Kirby Cove (except registered campers with valid permits)
 - ☐ San Francisco
 - China Beach
 - Fort Funston
 - Battery East Parking Fort Point National Historic Site (all areas outside Historic Fort itself)
 - Fort Mason: Black Point Battery stairway path leading to Van Ness Avenue
- ☐ **DAY USE as posted:**
 - ☐ Marin County
 - BATTERY TOWNSLEY (interior): First Sunday of each month, 1:00-4:00 pm
 - MUIR BEACH: 9:00 am until one hour after sunset
 - MUIR BEACH OVERLOOK: 9:00 am until one hour after sunset
 - MUIR WOODS NATIONAL MONUMENT: 8:00 am until sunset
 - NIKE MISSILE SITE:
 - Wednesday through Friday, 12:30-3:30 pm
 - First Saturday of the month, 12:30-3:30 pm
 - POINT BONITA LIGHTHOUSE beyond tunnel:
 - Saturday through Monday 12:30-3:30 pm
 - Evening and special programs as advertised in park events calendar
 - STINSON BEACH: 9:00 am until one hour after sunset
 - ☐ San Francisco
 - ALCATRAZ ISLAND public access is limited to the self-guided areas during day, evening and special programs operating hours. Alcatraz Island hours of operations are established by the Superintendent's office according to daylight savings and the after-hours program. Schedule of hours of operation is available on the park web site or through Superintendent's office. <http://www.nps.gov/goga/planyourvisit/hours.htm>

- BAKER BEACH parking: 6:00 am- until one hour after sunset
- BATTERY EAST parking: 6:00 am – 11:00 pm
- BATTERY CHAMBERLAIN (interior): First full weekend of the month 11:00 am-2:00 pm
- MERRIE WAY parking: 6:00 am-1:00 am
- NAVY MEMORIAL parking: 6:00 am-1:00 am.
- OCEAN BEACH 1ST Overlook parking open: 6:00 am-10:00 pm. 2ND overlook parking open 6:00 am-10:00 pm.

These areas are designated as day use due to public safety concerns associated with limited visibility, steep coastal cliffs and the marine environment during hours of darkness. In addition, these areas are significant for the naturally spectacular serpentine coastal bluffs and particularly the Fort Point area is one of our remnant natural areas and contains populations of three rare plants that are highly sensitive to damage with no scheduled attendant protection services.

Are There Public Use Limits?

- ☐ BEACH FIRES require permit at all times on Ocean Beach and for 25 people or more, refer to §2.13(a) (1) Fires and § 1.6 Permits of this compendium.
 - ☐ Marin County
 - Permitted only on Muir Beach in NPS designated fire pits
 - ☐ San Francisco
 - Permitted only on Ocean Beach in NPS designated fire pits

Management of beach fires through permit conditions allows the park to continue this activity without causing resource damage and harm to visitor safety.

- ☐ BICYCLE use is prohibited in the following developed park areas:
 - ☐ Marin County
 - Battery Yates Trail (top of battery), Fort Baker
 - Muir Woods National Monument, except Deer Park Fire Road
 - Point Bonita Trail, Marin Headlands
 - ☐ San Francisco
 - Crissy Field Lagoon Boardwalk
 - Fort Point Pier
 - ☐ San Mateo County
 - ☐ MILAGRA RIDGE
 - Milagra Ridge Trail
 - Milagra Creek Overlook
 - Milagra Summit Trail
 - ☐ MORI POINT
 - Bootlegger's Steps
 - Timigtac Trail
 - Mori Bluff Trail
 - Mori Peak Trail
 - Mori Headlands Trail
 - ☐ SWEENEY RIDGE

- Notch Trail

☐ RANCHO CORRAL DE TIERRA

- Alta Vista Trail, Rancho Corral de Tierra
- Ember Ridge Trail, Rancho Corral de Tierra

☐ PHLEGER ESTATE

Bicycles must be walked on the portion of the Spine Trail through the Ember Ridge Equestrian Center and along Old San Pedro Mountain Road through Ocean View Farms. (Exhibit 15)

- ☐ BICYCLE GROUPS: maximum number of bicyclists in any one group is 10. Larger groups of cyclists will have to divide into groups of no larger than 10.

Group size restriction is necessary for the safety of the cyclists using public roadways and authorized trails within the Park. Roadways and trails must be shared with other vehicles, pedestrians and horses. Group size does not exempt bicyclists from adhering to California Vehicle Code regulations.

- ☐ FOOD is prohibited:

- Alcatraz Island: beyond dock area
- Muir Woods National Monument except gift shop and Muir Plaza.

The restriction of food reduces rodent infestation and waste on Alcatraz Island and trash litter within Muir Woods National Monument.

- ☐ IDLING motor vehicle is prohibited:

- All vehicles traveling in the park while parked for more than 30 seconds must have engines remain off.
- The above prohibition does not apply to law enforcement patrol operations, fire or emergency search and rescue missions or training exercises.

The purpose of this restriction is to reduce public exposure to diesel, exhaust particulate matter and other toxic air contaminants by limiting the idling of buses, trucks or motor vehicles. In addition, this restriction will eliminate the noise from idling vehicles when parked in or adjacent to residential areas and natural settings located throughout the park.

- ☐ UNMANNED AIRCRAFT: Launching, landing, or operating an unmanned aircraft from or on lands and waters administered by the National Park Service within the boundaries of Golden Gate National Recreation Area is prohibited except as approved in writing by the superintendent.

The following are the only areas open to unmanned aircraft flight and operations:

☐ Marin County

- Shoreline Highway north of Muir Beach Overlook

☐ San Francisco

- Fort Funston (when hang gliders or para-gliders are not in the air)

Unmanned aircraft are a hazard to the safety of people piloting hang gliders and para-gliders in the Fort Funston area.

- ☐ ORGANIZED SPORTS: The following areas are closed to organized sports:

☐ Marin County

- Fort Baker Parade Ground

☐ San Francisco

- Crissy Field Airfield
- Fort Mason Great Meadow
- Fort Mason Parade Ground

Small impromptu pickup games that do not adversely impact the designated natural and cultural resources within designated areas will be allowed, e.g. Frisbee, hacky sack or similar low impact games. This closure is necessary to protect natural resources including the tidal marsh and wildlife therein and protect the newly restored turf from the overall impact, including length of stay

- ☐ OVERNIGHT MOORING / ANCHORING are prohibited at Horseshoe Cove at Fort Baker, Marin Headlands.

This is a congested area with a great deal of boat traffic and emergency response from U.S. Park Rangers and U.S. Coast Guard Station Golden Gate which prohibits the mooring or anchoring of vessels in areas of Horseshoe Cove other than at the Presidio Yacht Club that would create a hazard to navigation and a level of intrusion, associated with these use. The park receives millions of visitors per year. These restrictions are intended to reduce any possible conflict between users and allow the safe passage of emergency response from USCG.

☐ PARKING:

- All parking areas and roads in the park are closed to camping and overnight parking, with the exception of visitors properly displaying (hike-in and hike-through) backcountry camping permits. Those visitors may park at established trailheads located at: Bldg. T-1111, Bicentennial Campground, Kirby Cove, and Tennessee Valley parking in the Marin Headlands. Guests staying overnight at Cavallo Point Lodge, Fort Barry Hostel, Headlands Institute, and the Point Bonita YMCA may park at those locations. Fort Mason Hostel guests must display green parking permit and park in Fort Mason Quad parking area and along MacArthur Avenue only.
- CRISSY FIELD: Parking on any grass berm at East Beach parking is prohibited.
- WEST BLUFF: Monday thru Friday 3-hour parking limit. Saturday and Sunday \$1d/hr or \$6d/day, between the hours of 10am – 5pm. Lot closed between 11 PM and 6 AM.
- BATTERY EAST: 7 days a week \$1d/hr or \$6d/day, between the hours of 10am – 5pm.
- FORT MASON (Upper): Two hour public parking limit, except motorcycles/scooters and vehicles displaying NPS or resident parking permit or under condition of special use permit.
- FORT MASON (Lower): Paid parking operated by City Park through www.fortmason.org
- FORT MASON (Lower): Parking on Pier 1 and Pier 2 aprons prohibited.
- MUIR WOODS NM: Commercial carrier parking stalls open to public parking after 4:00 p.m.
- SUTRO HEIGHTS: Reserved valet parking for Cliff House patrons. Forty-four (44) parking stalls will be designated "Permit Parking Only - 5 p.m. to Midnight".

Since overnight use and camping is prohibited in the park except in established campgrounds or park partner facilities there is no valid reason for a vehicle to remain in the park overnight unless the Public Safety division or United States Park Police has been previously advised.

☐ PARK BUILDINGS AND FACILITIES

- Park administrative, maintenance, service roads, public safety, storage, resident housing, licensed concessionaires or lessee and park partners' facilities are closed to the public, including but not limited to access roads, outbuildings and grounds. This closure shall not apply

to residents, guests of residents, or persons engaged in legitimate government activities or permitted business activities.

- Except for facilities and sites designated open for visitor use, all buildings are closed to unauthorized entry. This shall not apply to persons in non-public areas who have been granted specific permission by the National Park Service (NPS); another authorized Federal agency, licensed concessionaires or lessee, park partners, their representatives and guests, contractors, or those who are under escort of park employees.
- All buildings used for the storage, treatment, or transmission of electricity, gas, telephone, waste disposal, and domestic water are closed to the public, unless under escort of park employees.

Enhanced security for employees, government property and utilities require these sites to have limited access.

- ☐ PICNICKING for groups over 50 people require permit, refer to definition as well as §1.6 "Permits" and §2.11 "Picnicking" of this compendium.

Because there are limited places in the park which can accommodate a picnic group of this size, and to minimize the impact of such a group on other visitors, a permit system is necessary.

WEDDINGS AND OUTDOOR CEREMONIES: Indoor and outdoor events in the park require a permit.

Due to the overwhelming request for these types of events in the park, while maintaining public access for multi-use recreation, these events may require additional utilities, services and oversight best facilitated through a permit. See §1.6 of this compendium for information.

What Park Areas Are Closed To The Public?

- ☐ All areas fenced and / or posted as closed

☐ Marin County

☐ FORT BAKER (Exhibit # 1)

- Baker/Barry Tunnel closed to pedestrians
- Battery Yates Wildlife Protection Area – beyond cable fencing
- Battery Cavallo
- Battery Spencer historic fortification pill boxes above Golden Gate Bridge
- Golden Gate Bridge north anchorage and pylons
- U.S. Coast Guard Station Golden Gate facilities and docks
- Vista Point service road accessed from lower Conzelman Road
- Lower Conzelman Road (south of parking lot to Lime Point access road) closed to vehicles only
- Lime Point access road and light station

☐ POINT BONITA LIGHTHOUSE AREA (Exhibit # 2)

- Bird Island Overlook – beyond cable fencing, cliff areas and coastal fortifications
- Bonita Cove and tide pools
- Travel off lighthouse main access road and trail
- U.S. Coast Guard Vessel Traffic Service radar site

☐ TENNESEE VALLEY (Exhibit # 3)

- Tennessee Valley Pond (next the beach)

☐ MUIR BEACH (Exhibit # 5)

- Big Lagoon and seasonal inlet

- Redwood Creek

☐ San Francisco

☐ ALCATRAZ ISLAND

the following locations are closed to public use (*Closed areas may be accessed under special circumstances with site supervisor approval*):

- All tide pools
- All designated sensitive bird breeding habitats
- Casemates under recreation yard
- Catwalk circling recreation yard
- Cistern area
- Incinerator area
- Lower west road over Barker Beach from Windy Gulch path to New Industries building
- Morgue
- Northeast perimeter path
- Officers club
- Parade Ground rubble piles
- Plaza northeast of Model Industries building (as posted)
- Quartermaster building
- Top tiers of cell house (A, B, C, & D Blocks)
- Warden's house
- Western and northwestern cliffs
- Windy Gulch path
- The Gardens
- Any area barricaded and signed "Area Closed for Your Safety"
- Any Buildings not open to the Public, such as Building 64, Upper Tiers

- ☐ The following locations on ALCATRAZ ISLAND will be closed seasonally to public use each year from February 1 through September 15, or the end of the nesting season as determined by the park's wildlife specialist in the following areas: (**Exhibit # 3**)

- Agave Trail (from dock to tide pools west of steps)
- Parade Ground and Agave Steps (end of season to be determined)
- Northeast Perimeter (dock to north fog horn) (end of season to be determined)
- West Side (lower west road from Parade Ground gate, past Apt. A, bird blind, incinerator, and west side of New Industries building) (end of season to be determined).

☐ FORT FUNSTON (**Exhibit #11**)

- Habitat protection area
- Coastal trail south approx. 600 yard section north of Funston Horse Trail intersection

☐ FORT MASON (Lower) (**Exhibit #7**)

- Pier One
- Pier Four
- Historic Guard Shack

☐ FORT POINT HISTORIC SITE (**Exhibit #8**)

- Historic Seawall
- Golden Gate Bridge anchorage and pylons

- ☐ LAND'S END (Exhibit # 10)
 - Dead Man's Point
 - Eagle Point social trails below overlook deck and along Coastal Trail
 - Point Lobos Archeological District, Sutro District
 - Travel off trail east of Painted Rock east to junction of main Coastal Trail
- ☐ PRESIDIO OF SAN FRANCISCO (Area A):
 - Lobos Creek riparian corridor (Exhibit #9)
 - Former Coast Guard Pier
 - Crissy Tidal Marsh consisting of an open water lagoon, sand flats, mud flats and vegetated marsh plain is located in the central portion of Crissy Field. The tidal marsh is defined as: starting at the eastern edge, from the channel inlet promenade footbridge extending along the shoreline; along the northern edge of the wetland; west to the perimeter of the restored airfield; and to the south along the vegetation buffer and barrier fencing parallel and adjacent to Mason Street. Public use is permitted on designated trails, including boardwalks and footbridges. (Exhibit #12)
 - Presidio Water Treatment Plant, Bldg. 1773
- ☐ San Mateo County
 - ☐ MORI POINT (Exhibit #17)
 - Ponds and fenced wetlands
 - Vertical bluffs and cove below Mori Bluff Trail
 - ☐ RANCHO CORRAL DE TIERRA (Exhibit #19)
 - Pond and wetlands (Charthouse Mitigation Site)
 - ☐ PHLEGER ESTATE (Exhibit #20)
 - West Union Creek

Areas are designated as closures due to public safety concerns associated with limited visibility, steep coastal cliffs and the marine environment during hours of darkness with no scheduled attendant protection services.

Alcatraz Island areas are closed to protect breeding birds. Certain bird species nesting on Alcatraz have demonstrated extreme sensitivity to human presence during the breeding season. These closures minimize the disturbance to their nesting activity.

Natural and cultural resources in these areas are highly sensitive to damage. In addition, they provide vital protection of habitat for shorebirds, Mission Blue butterflies, marine mammals, and other sea life.

Vegetated areas contain significant native plant communities and habitat that are subject to human-induced impacts to the coastal bluffs and dunes, a significant geological feature.

U.S. Coast Guard radar site; Station Golden Gate and Golden Gate Bridge facilities are for agency restricted use and protected for security purposes.

Residential areas inside the park are primarily maintained for the use of park residents and their invited guests; limited general public access is allowed.

Baker/Barry tunnel is a one-way traffic controlled tunnel for motor vehicles with bicycle lanes in both directions, and therefore not appropriate to allow pedestrian traffic.

- ☐ Dept. of Homeland Security ENHANCED SECURITY CLOSURES – ELEVATED
 - ☐ Fort Point National Historic Site
 - Marine Drive closed at Wave gate.
 - Long Avenue
 - ☐ Golden Gate Bridge North Anchorage (Marin Headlands)

- Lower Conzelman road access at Northwest Parking Lot.
 - Golden Gate Bridge North Anchorage (Fort Baker) Lower Conzelman road access closed at Bunker Road & Murray Circle intersection.
 - Sommerville Road access road to Lower Conzelman; boat launch and fishing pier closed east of USCG Station Golden Gate.
- ☐ Land and waters surrounding the north and south anchorage of the Golden Gate Bridge:
- Fort Point NHS 100 yards offshore from the low water mark.
 - Fort Baker 100 yards offshore from the low water mark.
 - no vessels shall
- [a] anchor beneath the Golden Gate Bridge, or within 100 feet of the east or west edges of the bridge;
- [b] operate or remain beneath the Golden Gate Bridge; or within 100 feet east or west of the edges of the bridge, for longer than it is reasonably necessary to traverse that area, except in an emergency, or with the permission of the Captain of the Port, SF Bay (USCG). *These closures are necessary when the condition is declared where there is a high risk of terrorist attacks. These closures restricting visitor access will remain in effect during National Threat Level – ELEVATED. These closures are rescinded when threat level high condition ELEVATED is reduced or eliminated.*
- ☐ Dept. of Homeland Security ENHANCED SECURITY CLOSURES – IMMINENT
- ☐ Fort Point National Historic Site
- Marine Drive closed at Wave gate
 - Long Avenue
 - Coastal trail closed at Fort Point administration Building to Battery East
 - Coastal trail closed at Battery East to Golden Gate Bridge
- ☐ Coastal Trail
- Coastal trail closed at Battery Boutelle east to Golden Gate Bridge
- ☐ Marshall Beach to Fort Point Beach (Golden Gate Bridge South Anchorage)
- Batteries to Bluffs trail from Lincoln Ave to Marshall Beach
- ☐ Golden Gate Bridge North Anchorage (Marin Headlands)
- Lower Conzelman road access at North West Parking Lot
- ☐ Golden Gate Bridge North Anchorage (Fort Baker)
- Lower Conzelman road access closed at Bunker Road & Murray Circle intersection
 - Sommerville Road access road to Lower Conzelman; boat launch and fishing pier closed east of USCG Station Golden Gate
- ☐ Land and waters surrounding the north and south anchorage of the Golden Gate Bridge:
- Fort Point NHS 300 offshore from the low water mark
 - Fort Baker 500 yards offshore from the low water mark
 - No vessels shall:
- [a] anchor beneath the Golden Gate Bridge, or within 100 feet of the east or west edges of the bridge;
- [b] operate or remain beneath the Golden Gate Bridge; or within 100 feet east or west of the edges of the bridge, for longer than it is reasonably necessary to traverse that area, except

in an emergency, or with the permission of the Captain of the Port, SF Bay, U.S. Coast Guard.

These closures are necessary when the condition is declared where there is an extreme risk of terrorist attacks. These closures restricting visitor access will remain in effect during National Threat Level – IMMINENT. These closures are rescinded when threat level extreme condition IMMINENT is reduced or eliminated.

36 CFR §1.5 (a)(2) What Activities Have Been Designated For A Specific Use Or Area, And Are Under Special Conditions And/Or Restrictions?

- ☐ **BOATING:** The following areas are closed to all vessels, including rowboats, kayaking, sail boarding, kite boarding and windsurfing:

- ☐ Marin County

- Redwood Creek
- Rodeo Lagoon and seasonal inlet, Marin Headlands
- Rodeo Lake, Marin Headlands

- ☐ San Francisco

- Alcatraz Island docks*, except NPS contracted ferry/barge service and United States Coast Guard
- Crissy Field Wildlife Protection Area which encompasses the shoreline and beach north of the Crissy Field Promenade (excluding the paved parking area, sidewalks and grass lawn of the former Coast Guard Station complex) that stretches east from the Torpedo Wharf to approximately 700 feet east of the former Coast Guard station landside, and all tidelands and submerged lands to 300 feet off shore. **(Exhibit #12)**
- Lobos Creek, Presidio Area A

This restriction is for the purpose of protection of irreplaceable natural resources. These areas provide vital habitat for water birds, shorebirds and marine life. These restrictions are necessary to protect water quality in the wetlands. In addition, there is a need to maintain clearance and reduce hazards to navigation for ferries transporting visitors to Alcatraz Island and minimize disturbance to nesting wildlife. Constant boat traffic, loud noise and the use of public address systems from tour vessels and night lighting may cause seabirds to abandon nests. The prohibition on boating will provide important areas of reduced disturbance for wildlife.

***NOTE:** Special regulations pertaining to boat landings on Alcatraz Island are found in 36 CFR Section 7.97(a) and were published in the Federal Register on December 11, 1992.

- ☐ **CAMPING:**

- Please refer to §2.10 of this compendium for specific camping area regulations.

- ☐ **DESIGNATED FISHING PIERS** the following areas do not require fishing licenses:

- ☐ Marin County

- Fort Baker pier and jetty

- ☐ San Francisco

- Fort Mason Piers Two & Three (Herbst and Festival Pavilions)
- Fort Point pier (a.k.a. Torpedo Wharf)

In accordance with California Fish & Game Code of Regulations Title 14 §1.88 public fishing piers and jetties, open 24 hours a day, do not require a State fishing license. See definitions.

☐ **FISHING:** The following areas are closed to fishing:

☐ Marin County

- Easkoot Creek, Stinson Beach
- Muir Woods National Monument (36 CFR 7.6)
- Redwood Creek (including Muir Beach Lagoon and tidewaters)
- Tennessee Valley Pond (next to the beach)
- Rodeo Lagoon, Marin Headlands
- Rodeo Lake, Marin Headlands

☐ San Francisco

- Alcatraz Island shoreline
- Crissy Field Tidal Marsh and Lagoon
- Crissy Field Former Coast Guard Pier, breakwater and seawall
- Lobos Creek, Presidio Area A

The Endangered Species Act and the Organic Act require special protection for the threatened and endangered species and the anadromous fish found in these areas. The above restrictions afford that protection. Alcatraz Island and the Coast Guard pier are closed to fishing due to public safety concerns associated with steep drop-offs and the marine environment during hours of darkness. Alcatraz Island is also closed to fishing due to the congestion caused by heavy visitation. Lobos Creek is closed to protect the public drinking water supply. The prohibition on fishing will provide important areas of reduced disturbance for wildlife.

GLASS BOTTLES/CONTAINERS possession is prohibited in the following areas:

☐ Park wide

- All beach areas and 15 feet adjacent
- All historic coastal defense structures

☐ San Francisco

- Crissy Field, north of promenade.
- Upper Fort Mason Great Meadow

The purpose of this regulation is to reduce the amount of injurious trash in the park and to prevent injury to park visitors.

☐ **PETS:** <http://www.nps.gov/goga/parkmgmt/pets.htm>

WHERE CAN I WALK MY DOG OFF LEASH PER THE 1979 PET POLICY? (Exhibit #13A & 13B)

The 1979 policy allows for managed pets leashed or under voice control in the following areas:

☐ Marin County

- Rodeo Beach and South Rodeo Beach, Fort Cronkhite
- Muir Beach
- Oakwood Valley Fire Road and upper section of Oakwood Valley Trail to Alta Avenue
- Alta Trail between Marin City and junction with Oakwood Valley Trail
- Orchard and Pacheco Trails between Marin City and Alta Trail
- Tamalpais Area: 4 Corners tract above Mill Valley bounded by State Route 1, Panoramic Highway, Sequoia Valley Road and Homestead Valley area.
- Trail corridors (3) in Marin Headlands:
 1. Coastal Trail from Golden Gate Bridge to junction with Wolf Ridge Trail;
 2. Loop Trail from Rodeo Beach parking lot up Coastal Trail paved road (Old Bunker Road)

near Battery Townsley and return to Rodeo Beach on paved road;
3. Wolf Ridge Loop (Coastal Trail to Wolf Ridge Trail; Wolf Ridge Trail to Miwok Trail;
Miwok Trail back down to Coastal Trail).

San Francisco

- Baker Beach north of Lobos Creek
- Crissy Field, excluding picnic areas and Wildlife Protection Area seasonal leash restriction*
- Fort Funston, except in the 12-acre closure in northwest Fort Funston.
- Fort Miley, east
- Fort Miley, west
- Land's End
- Ocean Beach, excluding Snowy Plover Protection Area seasonal leash restriction*

San Mateo County

- None

* For seasonal leash restrictions, see 2008 Special Regulation, 36 CFR 7.97(d)

<http://www.nps.gov/goga/planyourvisit/upload/Fed%20Reg%20Final%20Rule091908-2.pdf>

WHERE MUST I WALK MY DOG ON LEASH PER THE 1979 PET POLICY? (Exhibit #13A & #13B)

Marin County

- Marin Headlands Trail corridors (3):
 1. Coastal Trail between Hill 88 (junction of Coastal Trail and Wolf Ridge Trail) and Muir Beach
 2. Miwok Trail between Tennessee Valley parking area to State Route 1

San Francisco

- Baker Beach Picnic areas and parking lots
- Crissy Field Picnic areas and parking lots.
- Fort Mason
- Sutro Heights Park

WHAT AREAS ARE CLOSED TO DOGS PER THE 1979 PET POLICY? (Exhibit #13A & #13B)

Marin County

- Audubon Canyon Ranch
- Muir Woods National Monument
- Stinson Beach

San Francisco

- Alcatraz Island
- Baker Beach-Lobos Creek and south to park boundary
- China Beach(formerly Phelan Beach)
- Fort Point

The 1979 Pet Policy states that "unmanaged animals are not allowed in GGNRA."

In all other areas of the park where dogs are allowed, 36 CFR 2.15 (a)(2), the federal regulation requiring dogs to be on leash, applies.

Refer to §2.15 "Pets" in this compendium for additional areas closed to pets and special conditions imposed by the Superintendent.

The above prohibitions or restrictions do not apply to:

- Emergency search and rescue missions; or
- Law enforcement patrol or bomb dogs; or
- Qualified service dogs accompanying persons with disabilities per the American Disability Act. (NOTE: Companion animals are not service animals, but are considered "pets" with no access rights under federal statute.)

SWIMMING BEACHES: Stinson Beach is designated as a swimming beach.
Please refer to §3.16 and §3.17 for specific swimming area designation uses.

SURFING: Restricted at Stinson Beach, including Kite surfing and Kite boarding, when swimmers are present, and allowed only in areas designated as "Non Swimming Areas" and only at such times as are deemed safe by the Supervisory Ranger or by his/her representative.

NON-SWIMMING AREAS: will be designated through the use of movable, brightly colored buoys and/or the posting of flags; the posting of prominent signs on the lifeguard towers and individual contacts with users as necessary.

36 CFR §1.5 (a)(3) The following restrictions, limits, closures, designations, conditions, or visiting hour restrictions imposed under §§ (a)(1) or (2) have been terminated:

BOATING: The following areas are closed to all vessels, including rowboats, kayaking, sail boarding, kite boarding and windsurfing:

- Alcatraz Island 2016: Seasonal closure from June 21st to September 22nd of shoreline to 500 feet; excluding the East shoreline between the guard tower and the South East corner of the island. (122 25'07.9"W 37 49'29.9"N) (Exhibit #6)

36 CFR §1.6 – ACTIVITIES THAT REQUIRE A PERMIT

(f) The following is a compilation of those activities for which a permit from the superintendent is required: (415) 561-4300 or visit the park website www.nps.gov/goga .

§1.5(d) The following activities related to Public Use Limits:

- Picnic:50+ persons http://www.nps.gov/goga/planyourvisit/upload/nps_permit_picnics.pdf
- Outdoor ceremony <http://www.nps.gov/goga/planyourvisit/weddings.htm>
- Entry into closed area
- Guide and Service dog training

§2.4(d) Carry or possess a weapon, trap, or net

§2.5(a) Specimen collection (Take plant, fish, wildlife, rocks or minerals)

§2.10(a) Camping activities: <http://www.recreation.gov/>

- Kirby Cove, Bicentennial, Haypress and Hawk Camp
- Kirby Cove Day-use site
- Overnight parking permits for a hike through the park with accommodations outside of the park

§2.12 Audio Disturbances:

- (a)(2) Operating a chain saw in developed areas

- (a)(3) Operation of any type of portable motor or engine, or device powered by a portable motor or engine in non-developed areas
- (a)(4) Operation of a public address system in connection with a public gathering or special event for which a permit has been issued pursuant to §2.50 or §2.51

§2.13(a)(1) Beach Fires

- Groups over 25 people: <http://www.nps.gov/goga/planyourvisit/upload/10-930%20Special%20Park%20Uses%20beach%20fires.pdf>

§2.17 Aircraft & Air Delivery:

- (a)(3) Delivery or retrieval of a person or object by parachute, helicopter or other airborne means
- (c)(1) Removal of a downed aircraft

§2.37 Soliciting or demanding gifts, money goods or services (Pursuant to the terms and conditions of a permit issued under §2.50, §2.51 or §2.52)

§2.38 Explosives:

- (a) Use, possess, store, transport explosives, blasting agents
- (b) Use or possess fireworks

§2.50(a) Conduct a sports event, pageant, regatta, public spectator attraction, entertainment, ceremony, and similar events <http://www.nps.gov/goga/planyourvisit/specialuses.htm>

§2.51(a) Public assemblies, meetings, gatherings, demonstrations, parades and other public expressions of views <http://www.nps.gov/goga/planyourvisit/specialuses.htm>

§2.52(c) Sale or distribution of printer matter that is not solely commercial advertising

§2.60(b) Livestock use

§2.61(a) Residing on federal lands

§2.62 Memorialization:

- (a) Erection of monuments (Requires approval from Director)
- (b) Scattering ashes from human cremation
http://www.nps.gov/goga/planyourvisit/upload/form_letter_ashes.pdf

§4.11(a) Exceeding of established vehicle load, weight and size limits

§5.1 Advertisements - (Display, posting or distribution.)

§5.3 Engaging in or soliciting any business (Requires a permit, contract or other written agreement with the United States, or must be pursuant to special regulations).

- Commercial Visitor Services that meet the definitions and requirements of the parks Commercial Use Authorization Program as described at <http://www.nps.gov/goga/getinvolved/dobusinesswithus.htm>, including:
- Commercial Carriers
- Outdoor Fitness Programs
- Guided Services

Commercial Dog Walking

The walking of four or more dogs, with the maximum of six, at one time by any one person for consideration (commercial dog walking) is prohibited within San Francisco and Marin County sites administered by Golden Gate National Recreation Area (GGNRA), unless:

- The person has been issued a current valid permit from GGNRA.
 - The walking of four or more dogs, with a maximum of six, is done pursuant to the terms and conditions of that permit.
 - Permit holders abide by all National Park Service regulations, including 36 CFR 2.15 (a), which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not open to voice-control dog walking per the 1979 Pet Policy.
 - The permit is visibly displayed and produced for inspection upon request by an officer with law enforcement authority in areas administered by GGNRA.
- ☐ §5.5 Commercial Photography/Filming: <http://www.nps.gov/goga/planyourvisit/filming.htm>
- (a) Commercial filming of motion pictures or television involving the use of professional casts, settings or crews, other than bona fide newsreel or news television
 - (b) Still photography of vehicles, or other articles of commerce or models for the purpose of commercial advertising.
- ☐ §5.6(c) Use of commercial vehicles on park area roads (The superintendent shall issue a permit to access private lands within or adjacent to the park when access is otherwise not available)
- ☐ §5.7 Construction of buildings, facilities, trails, roads, boat docks, path, structure, etc.
- ☐ §7.97(a) Boat landings on Alcatraz

PART TWO – RESOURCE PROTECTION, PUBLIC USE AND RECREATION

36 CFR §2.1 – PRESERVATION OF NATURAL, CULTURAL AND ARCHEOLOGICAL RESOURCES

(b) Where must I stay on the trail?

- ☐ All areas fenced and / or posted as closed
- ☐ Marin County (Exhibit #1, #2, #3, #4, #5, #15)
- ☐ FORT BAKER
 - Drown Fire Road
 - Bay Trail (Battery Yates)
 - Chapel Trail
 - ☐ MARIN HEADLANDS
 - Clyde's Ridge Trail
 - Slacker Trail
 - Slacker Ridge Trail
 - Coastal Trail - Hawk Hill Connector
 - Point Bonita Lighthouse Trail
 - Student Conservation Assoc. (SCA) Trail
 - Kirby Cove Road – from Conzelman Gate to Campground Parking Lot
 - Alta Fire Road
 - ☐ MUIR BEACH
 - Coastal Trail, Tennessee Valley to Muir Beach
 - Muir Beach Access Trail, Muir Beach
 - Muir Beach Overlook Trail
 - Kaasi Trail, Muir Beach
 - ☐ MUIR WOODS NATIONAL MONUMENT

- ☐ San Francisco (Exhibit #6, #8, #9, #10)
 - Alcatraz Island, Agave Trail
 - Coastal Trail, Battery East Earthworks
 - Batteries to Bluffs Trail, Presidio
 - Coastal Trail, Presidio and Land's End
- ☐ San Mateo County (Exhibit #16, #17, #18, #19, #20)
 - ☐ MILAGRA RIDGE
 - Milagra Summit Trail
 - Milagra Battery Trail
 - Milagra Creek Overlook Trail
 - Milagra Ridge Trail; southern junction of the Milagra Ridge Spur Trail to the northern junction of the Milagra Ridge Road
 - ☐ SWEENEY RIDGE
 - Notch Trail
 - ☐ MORI POINT
 - Pollywog Path
 - Old Mori Trail west of junction with Pollywog Path
 - Headlands Trail
 - ☐ RANCHO CORRAL DE TIERRA
 - Within the Ocean View Farms, Ember Ridge, Moss Beach Ranch, and Renegade Ranch equestrian operations
 - ☐ PHLEGER ESTATE
 - Miramontes Trail

This restriction is for the purpose of visitor safety associated with uneven surfaces, loose rock formations, and steep drop-offs areas identified as the sites of multiple fatalities over the years. Other areas require protection of irreplaceable cultural resources or threatened and endangered species habitat. In addition, these areas provide vital habitat for federally endangered mission blue butterfly species and other birds, marine mammals, and other sea life. The vegetated areas contain native and historical vegetation that is sensitive to trampling due to shortcutting and erosion paths.

(c)(1), (c)(2) The following fruits, nuts, berries or unoccupied seashells may be gathered by hand for personal use or consumption, in accordance with the noted size, quantity, collection sites and/or use or consumption restrictions:

- Plums, apples, figs, blackberries and unoccupied seashells may be gathered for personal consumption or use in quantities of less than one (1) quart per person per day and no more than 5 total quarts per person per year.
- Muir Woods National Monument: No collecting of any kind is allowed.

It has been determined that the gathering or consumption of fruits and berries will not adversely affect park wildlife, the reproduction potential of any plant species, or otherwise adversely affect park resources. If future monitoring indicates that such gathering or consumption is likely to cause adverse effects to park resources, then the authorization of this consumptive use will be terminated. Use of these items for any purpose other than personal consumption is specifically prohibited.

See [http:// www.presidio.gov](http://www.presidio.gov) PART 1002 § 1002.1(c)(2) for areas available for mushroom harvesting on Presidio Trust jurisdiction.

36 CFR §2.2 - WILDLIFE PROTECTION**(e) The following areas are closed to the viewing of wildlife with the use of an artificial light:**

- The entire park is closed to viewing wildlife by artificial light.

The purpose of this regulation is to protect park wildlife from poaching activity and the effect of temporarily blinding the animal and potentially jeopardizing its safety. NOTE: Night vision devices are not artificial lights; however, infrared lighting /beams are considered artificial lights and are included in this prohibition.

36 CFR §2.10 – CAMPING and FOOD STORAGE

(a) The sites and areas listed below have been designated for camping activities as noted. A permit system has been established for certain campgrounds or camping activities, and conditions for camping and camping activities are in effect as noted. Visit the park website at www.nps.gov/qoga for specific stay and site limits and reservation systems.

☐ **Designated Campgrounds**
☐ **Marin Headlands**

- Bicentennial
- Haypress
- Hawk Camp
- Kirby Cove, including day-use area

☐ **Camping Activities**

- Camping, overnight or multiple day parking in any type of motor vehicle is prohibited upon lands administered by Golden Gate National Recreation Area except in campgrounds and designated sites by permit.
- Campground check out is 12:00 noon on the day of departure.
- Campground use fees, if applicable, shall be paid prior to arrival.
- Up to 15 people may visit the registered campers per campsite. Between the hours of 10:00 p.m. and 6:00 a.m., registered campers shall not exceed the designated capacity.
- Minors must be supervised. A responsible leader, 21 years or older, must be present for every 10 children under 18 years of age.
- The minimum age of any camper is 18 years of age, unless accompanied by an adult or unless a legal guardian provides a letter of permission. This letter must state the name of minor that has permission to camp, dates allowed to camp, contact name and number of legal guardian.
- Dogs and other pets are prohibited, except Service Animals as defined by 28 CFR part 35 Section 34.104. (NOTE: Crime deterrent effects of an animal's presence and the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for the purposes of the definition of Service Animal but are considered "pets" with no access rights under federal statute.)
- Amplified music is prohibited.
- Vehicles are prohibited within the boundaries of walk-in or hike-in campgrounds.
- Drive-in access will be allowed at Kirby Cove for disabled visitors. This drive-in access is allowed for the ease of loading and unloading the disabled visitor only, not for loading and unloading gear.

(b)(3) Camping within 25 feet of a fire hydrant or main road, or within 100 feet of a flowing stream, river or body of water is authorized only in the following areas:

- In established campsites in designated campgrounds.

(d) Conditions for the storage of food are in effect, as noted, for designated campgrounds:

- All food (including canned, bottled or otherwise packaged, equipment used to cook or store food, garbage and toiletries such as soap, toothpaste and cosmetics) should be stored in the food lockers provided.
- When there is more food than can be stored in the locker, canned or bottled items that have never been opened may be stored in the trunk of the vehicle parked in the designated parking areas or if there is no trunk, as low in the vehicle as possible, provided that the cans and bottles are stored out of sight in odor-tight containers and all vehicle doors, windows and vents are closed.

36 CFR §2.11 – PICNICKING

(a) The following areas are closed to picnicking:

- Muir Woods National Monument, except Muir Plaza (former upper main parking lot).
- Fort Point (inside Historic Fort)

Conditions for picnicking where allowed:

- Battery Wallace, Marin Headlands and West Bluff, Crissy Field are first come, first served picnic sites and do not require a permit for groups less than 50 people. No groups over 50 people.
- Black Point Battery and West Fort Miley picnic areas can be reserved. No minimum group size. Visitors can reserve these sites by calling the Office of Special Park Uses at (415) 561-4300.
- Groups of fifty (50) persons or more shall be considered special use and require a permit.

NOTE: Permits will not be issued for groups of fifty (50) persons or more on weekends and holidays from March 15-October 15 at the following sites:

- ☐ Marin County
 - Muir Beach
 - Muir Beach Overlook
 - Rodeo Beach
 - Stinson Beach
- ☐ San Francisco
 - Baker Beach
 - China Beach

36 CFR 2.13 – FIRES

(a)(1) The lighting or maintaining of fires is generally prohibited, except as provided for in the following designated areas and/or receptacles, and under the conditions noted:

SPARE THE AIR DAYS

- Mandatory curtailment for all fires: No person shall ignite, cause to be ignited, permit to be ignited, or maintain any recreational fires, including campfires, beach fires, and outdoor grills during summer and winter Spare the Air Days designated by the Bay Area Air Quality Management District when negative impact upon public health is anticipated.

CAMPFIRES☐ **Designated Areas:**

- Campfires are permitted only in established campgrounds or picnic areas that have fire enclosures, grill or fire grates provided by the park.
- NPS and park partners are allowed to have fires in approved portable containers and fixed fire pits with a programmatic element that interprets the Park. These fires will be set as part of a planned civic event or program designed to educate or otherwise benefit the public. The fire shall be set or allowed by park or partner employees, in the performance of their official duty.

☐ **Established Conditions for Campfires:**

- All firewood must be brought into the park. No gathering, cutting or scavenging of firewood or kindling is permitted in the park from any source.
- Chemically treated wood, painted wood, wood with nails or staples shall not be used in any fire.
- No campfires are allowed when fire danger is high, very high, or extreme.

☐ **BEACH FIRES**Designated Beach Fire Areas:☐ **MUIR BEACH:**

- Fires permitted during day use (9:00am - one hour after sunset)
- Only in NPS designated fire rings
- Groups over 25 people require a permit. Call 561-4300

☐ **OCEAN BEACH: (Exhibit #14)**

- Fires permitted from 6:00am - 9:30pm from March 1st to October 31st
- Only in NPS designated fire rings stairwells # 15-20
- Permits are required for all fire pits at all times
- Groups over 25 persons are required to go through the existing Special Use Permit (SUP) process

☐ Established Conditions for Beach Fires:

- All firewood must be brought into the park. No gathering, cutting or scavenging of firewood or kindling is permitted in the park from any source.
- Fires attended at all times.
- Chemically treated wood, painted wood, wood with nails or staples shall not be used in any fire.
- Debris burning is not permitted, **including Christmas trees.**
- Refuse must be removed from beach.
- Minors must be supervised. A responsible leader, 18 years or older, must be present for every 10 children under 18 years of age.
- Ceramic pit fires are prohibited.
- No Beach Fires are allowed when fire danger is high, very high, or extreme.

(a)(2) The following restrictions are in effect for the use of stoves or lanterns:

GRILL/STOVE FIRES

Receptacles Allowed:

- Fixed charcoal grills provided by the park and/or visitor's portable liquid fuel stoves or charcoal barbecues used only in established picnic areas, campgrounds, or beaches unless signed or permitted otherwise.

Established Conditions for Grill/Stove Fires:

- Debris burning is not permitted.
- Portable charcoal and liquid fuel stoves are prohibited on Upper Fort Mason Great Meadow.
- Only liquid fuel stoves are permitted in Haypress Campground, Hawk Campground and Bicentennial Campground.
- No Grills (including park provided grills) or portable charcoal stoves are allowed when fire danger is very high or extreme.

(b) Fires must be extinguished according to the following conditions:

- Campfires will be completely extinguished with water, doused and stirred.
- Beach fires will be completely extinguished with water, doused and stirred. **Fires should not be covered with sand as it will only insulate the heat and create an unseen danger for visitors and wildlife.**
- Grill/Stove fire coals must be extinguished and disposed of in specifically marked receptacles provided by the park.

(c) Fire danger closures will be in effect as noted:

Fire danger closures will be in effect when fire danger rating is high, very high, or extreme:

- During very hot, dry weather conditions, "Spare the Air" days, strong winds, and extreme fire danger days or by order of the Superintendent, campfires and beach fires shall not be allowed anywhere in the park. All beach fire permits will become null and void.
- NOTE: Liquid fuel stoves are exempt from these closures. Park provided grills and portable charcoal stoves may be used when fire danger is high, but are not permitted when fire danger is very high or extreme. Visitors may call the park communication center (415-561-5510) to check on current conditions.

Past events have demonstrated that the park experiences periods of increased fire danger, which require aggressive fire management. The purposes of these restrictions is to reduce human health hazards from a high level of air pollution, or the possibility of an uncontrolled wildfire and are in effect to protect the natural and cultural resources of the park, and the recreational enjoyment by other visitors.

NOTE: No fires are allowed at Muir Woods National Monument under any condition, Special Regulation 36 CFR 7.6

36 CFR §2.15 – PETS <http://www.nps.gov/goga/parkmgmt/pets.htm>

(a)(1) The following structures and/or areas are CLOSED to pets by the Superintendent:

- ☐ All park buildings and facilities, including outdoor restrooms and public showers.
- ☐ Marin County (Exhibit #3, #5, #13A)
 - ☐ FORT BAKER
 - Chapel Trail
 - Fort Baker Pier
 - ☐ MARIN HEADLANDS
 - Alta Trail (only between Oakwood Valley Trail intersection and Wolfback Ridge Road)
 - Bicentennial Campground
 - Bobcat Trail
 - Coyote Ridge Trail
 - Dias Ridge
 - Fort Baker Pier
 - Fox Trail
 - Green Gulch Trail
 - Hawk Campground and Trail
 - Haypress Campground and Trail
 - Kirby Cove area
 - Lower Fisherman Trail & Beach
 - Marincello Trail
 - Middle Green Gulch Trail
 - Miwok Cutoff Trail
 - Miwok Trail, between Wolf Ridge and Bobcat Trail
 - Morning Sun Trail
 - Old Springs Trail
 - Point Bonita Lighthouse Trail
 - Rodeo Avenue Trail
 - Rodeo Beach Lagoon
 - Rodeo Lake
 - Rodeo Valley Trail
 - SCA Trail
 - Slacker Hill Trail
 - Tennessee Valley Beach
 - Tennessee Valley Trail from Parking Lot to Beach
 - Rhubarb Trail
 - Upper Fisherman Trail & Beach
 - ☐ MUIR BEACH
 - Big Lagoon
 - Owl Trail
 - Redwood Creek
 - ☐ MUIR WOODS NATIONAL MONUMENT
 - Muir Woods National Monument
 - Redwood Creek Trail
 - ☐ STINSON BEACH
 - Coast Trail
 - Dipsea Trail
 - Matt Davis Trail
 - McKennan Trail
 - Willow Camp Fire Road

- Stinson Beach (beach only).
- ☐ San Francisco (Exhibit #6, #7, #13B)
 - ☐ ALCATRAZ ISLAND
 - ☐ CRISSY FIELD
 - Crissy Field Tidal Marsh and Lagoon
 - ☐ UPPER FORT MASON
 - Community Garden
 - ☐ FORT FUNSTON
 - Fort Funston Habitat Protection Area (Attachment)
 - Coastal Trail, intersection of Horse Trail to Great Highway, closed due to erosion.
 - ☐ FORT POINT
 - Fort Point (inside historic fort)
 - Fort Point pier (Torpedo Wharf)
 - ☐ PRESIDIO AREA A
 - Battery to Bluffs Trail
 - Lobos Creek
 - Marshall Beach
 - China Beach
- ☐ San Mateo County (Exhibit #18, #20)
 - ☐ SWEENEY RIDGE
 - Notch Trail
 - ☐ PHLEGER ESTATE
- ☐ The above prohibitions or restrictions do not apply to:
 - Emergency search and rescue missions or training exercises
 - Law enforcement patrol or bomb dogs
 - Service Animals as defined by 28 CFR part 35 section 34.104 and accompanying an individual with a Disability as defined by 43 CFR Part 17.503. (NOTE: Crime deterrent effects of an animal's presence and the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for the purposes of the definition of Service Animal but are considered "pets" with no access rights under federal statute.)

These restrictions are for the purpose of the protection of irreplaceable natural resources. These areas provide vital habitat for marine life, shorebirds and large concentrations of water birds. Consistent with public health and safety, the protection of natural and cultural resources, and avoidance of conflict among visitor use activities, pets must be restricted. Pets are not considered compatible with the broad park goal of minimal resource impact or inherently suitable for adapting quickly to a strange environment often involving close association with strange persons or animals. It is recognized that many park visitors have pets and they are permitted where they do not jeopardize basic park values. This restriction on pets will provide important areas of reduced disturbance for resting and feeding water and shorebirds and other marine wildlife.

(a)(3) Pets may be left tied to an object under the following conditions:

- Pets may be tied and left unattended using the bollards at the Warming Hut at Crissy Field

- Pets will not be left unattended in areas or in circumstances that they will create a nuisance to other visitors or cause disturbance to wildlife.
- Pets will not be left in areas where food, water, shade, ventilation and other basic needs are inadequate.

This requirement is intended to ensure pets do not harass wildlife or disturb park visitors and also to ensure pets are properly cared for in the park.

(a)(5) Pet excrement must be disposed of in accordance with the following conditions:

- In all areas of the park pet excrement shall be removed immediately from the park or deposited in a refuse container by the person(s) controlling the pet(s).

(d) Pets may be kept by park residents under the following conditions:

- Pets may be kept by permanent residents of park areas consistent with provisions of this section, the Compendium and in accordance with Golden Gate National Recreation Area Housing Management Plan.

36 CFR §2.16 – HORSES and PACK ANIMALS

(a) The use of horses or pack animals is permitted on the following trails, routes or areas:

☐ Marin County

☐ MARIN HEADLANDS

- Alta Trail
- Bobcat Trail
- Bunker Road
- Coastal Trail:
 - McCullough Rd. to Slacker Hill (vista point only)
 - Julian Fire Road (McCullough to Rifle Range)
 - From Visitor Center to Rodeo Beach
 - Between Tennessee Valley Trail and Kaashi Road
- Countyview Trail
- Coyote Ridge Trail
- Conzelman Road
- Dias Ridge Trail
- Field Road
- Fox Trail
- Green Gulch Trail
- Haypress Campground and Trail
- Hawk Camp and Trail
- Marincello Trail
- Miwok Trail
- Miwok Connector Trail (across from Rifle Range)
- Oakwood Valley Trail between its intersection of Oakwood Meadow Trail and Tennessee Valley Road
- Old Springs Trail
- Rodeo Avenue Trail: US 101 to Alta Avenue
- Rodeo Beach
- Rodeo Valley Trail
- Tennessee Valley Trail (except Lower Tennessee Valley Trail)
- Upper Rodeo Trail

- ☐ MT. TAMALPAIS AREA
 - Coastal Trail-Bob Cook between apple orchard and Bolinas Ridge Trail
 - Bolinas Ridge Trail
 - Dipsea (Deer Park Fire Road)
 - McKennan Gulch Trail
 - Muir Beach Area
 - Willow Camp Fire Road
- ☐ San Francisco
 - ☐ OCEAN BEACH
 - ☐ FORT FUNSTON
 - Fort Funston Beach
- ☐ San Mateo County
 - ☐ MILAGRA RIDGE
 - Milagra Ridge Road, except Summit Trail
 - ☐ MORI POINT
 - Old Mori Trail
 - Upper Mori Trail
 - Lishumsha Trail
 - Coastal Trail
 - ☐ SWEENEY RIDGE
 - except Notch Trail
 - ☐ RANCHO CORRAL DE TIERRA
 - except Alta Vista Trail
 - ☐ PHLEGER ESTATE

The park receives millions of visitors per year. These restrictions are intended to reduce any possible conflict between users.

36 CFR §2.20 – SKATING, SKATEBOARDS and SIMILAR DEVICES

- ☐ Marin County

Roller skates, skateboards or similar non-motorized devices are permitted on hard surfaces wherever pedestrian traffic is allowed with the exception of:

 - ☐ MARIN HEADLANDS
 - Conzelman Road
 - McCullough Road
 - Field Road
 - Marine Mammal Center
 - Nike Missile Site
 - Rodeo Beach parking lot
 - On any historic military coastal defense battery, emplacement or structure
 - Stairs, walkways, benches, sea walls, seat walls, railings, ramps or curbs.
 - ☐ MUIR WOODS NATIONAL MONUMENT

- ☐ San Francisco
Roller skates, skateboards or similar non-motorized devices are permitted on hard surfaces wherever pedestrian traffic is allowed with the exception of:

- Alcatraz Island
- Fort Point National Historic Site (inside Fort)
- Fort Miley (East & West)
- Land's End
 - Paved sidewalks
 - Merrie Way Parking Lot
 - Navy Memorial Overlook
- On any historic military coastal defense battery, emplacement or structure
- Stairs, walkways, benches, sea walls, seat walls, railings, ramps or curbs.

- ☐ San Mateo County
Roller skates, skateboards or similar non-motorized devices are permitted on hard surfaces wherever pedestrian traffic is allowed with the exception of:

- ☐ SWEENEY RIDGE
 - Historic Buildings and Bunkers
- ☐ MILAGRA RIDGE
 - Historic Bunkers

- ☐ All extreme skateboarding, e.g. mountain boarding, roll surfing, dirt surfing or sport-sailing is prohibited.
- ☐ The use of any purpose-built vehicle powered by a traction kite (power kite) e.g. Kite buggy, land surfing or land sailing are prohibited.

The park receives millions of visitors per year. These restrictions are intended to reduce any possible conflict between users, protect natural, cultural and archeological resources, and for public safety concerns. Power kiting and extreme boarding of any type can allow passage across most every type of terrain and at greater speeds powered by the wind and therefore subject to its own levels and degrees of danger. In consideration of the increased potential for resource damage, threat to wildlife and the health and safety of visitors these activities are prohibited.

36 CFR §2.21 – SMOKING

(a) The following portions of the park, or all or portions of buildings, structures or facilities are closed to smoking:

- ☐ All smoking within the Concession facilities providing food service will comply with all local and State ordinances and regulations.
- ☐ Smoking is allowed at designated employee break areas in the park, including Muir Woods National Monument and Alcatraz Island.
- ☐ Smoking is prohibited on or at:
 - All government buildings/facilities/vehicles (excluding residences and designated smoking areas).
 - All park partner/tenant facilities (excluding residences and designated smoking areas).
 - Alcatraz Island, except in the designated dock area.
 - Fort Point NHS (within the historic fort)
 - Muir Woods National Monument, except parking areas only. NOTE: During extreme fire danger periods' public smoking is entirely prohibited throughout the Monument (including

parking areas). NOTE: Employees may still smoke in designated break areas during extreme fire danger, but must be extra cautious.
When fire danger is extreme, smoking is prohibited on all trails within all areas of Golden Gate NRA.

These restrictions are intended to protect park resources, reduce the risk of fire and prevent conflicts among visitor use activities.

36 CFR §2.23 – RECREATION FEES <http://www.nps.gov/goga/planyourvisit/feesandreservations.htm>

(b) Recreation fees, and/or a permit, in accordance with 36 CFR part 71, are established for the following entrance fee areas, and/or for the use of the following specialized sites, facilities, equipment or services, or for participation in the following group activity, recreation events or specialized recreation uses:

Entrance Fee Areas:

Muir Woods National Monument

- Individuals 16 years of age and older: \$10.00 per day, under 16 is free.
- Local Passport is good for 12 months and admits pass holder and all accompanying passengers in a private vehicle for an annual fee of \$40.00.
- Interagency senior, access, and annual pass – admission free with pass in possession and applies to all vehicle occupants.

Alcatraz Island

- Tickets must be purchased through contract ferry service, Alcatraz Cruises.
<http://www.alcatrazcruises.com/>.

Expanded Amenity Fee (Such as but not limited to parking fees in designated parking lots)

- Battery East Parking – \$1d/hr or \$6d/day between the hours of 10am – 5pm (except Federally observed holidays)
- West Bluff Parking – Monday thru Friday 3-hour parking limit. Saturday and Sunday \$1d/hr or \$6d/day, between the hours of 10am – 5pm (except Federally observed holidays)

Special Recreation Permit Fee (Such as but not limited to group activities, recreation and special events or ceremonies):

Activities that require a special use permit: <http://www.nps.gov/goga/planyourvisit/specialuses.htm>

- Festivals, Concerts, Athletic Events and Commercial Filming.
- Weddings and ceremonies
- Use of conference centers & reception facilities
 - Alcatraz Island
 - Fort Mason Chapel
 - Fort Mason Officer's Club (managed by Next Course)

NOTE: Outdoor ceremonies only at the first-come, first-served picnic sites at Battery Wallace and the West Bluff picnic area that meet all the qualifications of a picnic for under 50 people and do not have any equipment except that associated with the picnic (i.e. no stage, no band, no rice thrown, no catering, etc.) do not need a permit. Please look at the links for details about regulations, including a list of prohibited flowers.

The authority to require a permit under this section is provided in §71.2 Examples of specialized recreation uses might be: foot or bicycle races, festivals, filming, etc.

36 CFR §2.35 –ALCOHOLIC BEVERAGES

(a)(3)(i) The following public use areas, portions of public use areas, and/or public facilities within the park are closed to consumption of alcoholic beverages, and/or to the possession of a bottle, can or other receptacle containing an alcoholic beverage :

- ☐ Marin County
 - Muir Woods National Monument
- ☐ San Francisco
 - Alcatraz Island
 - Kegs are prohibited in Upper Fort Mason Great Meadow
 - Fort Point National Historic Site (inside the Fort)
 - Navy Memorial parking
 - Merrie Way parking lot and sidewalks
 - Sutro Baths
 - Ocean Beach, including walkways and seawall

Special prohibitions at Ocean Beach, Sutro Baths, Merrie Way, Navy Memorial, and the Great Meadow are required due to the history of aberrant behavior directly attributed to the use of alcohol which has led to assaults, unruly crowds, disorderly conduct, and vandalism to both public and private property. Prohibition at Fort Point NHS, Muir Woods NM and Alcatraz Island is intended to reduce conflict between users and enhance visitor safety.

36 CFR §2.62 – MEMORIALIZATION

(b) A permit for disposition of cremated remains is required. Permits will be issued for pre-designated areas only. In addition to specific site conditions, the following general terms and conditions apply to all permit applications:

Permit conditions:

- A permit for disposition shall be issued under this section only upon the signed acknowledgement by the person making application that resource protection laws apply to the disposition and that the permit gives no right of unrestricted access to park lands or that remains should remain undisturbed for perpetuity.
- All applicable California State laws for disposition of cremated remains apply.
- Remains to be scattered must have been cremated and pulverized.
- The scattering of remains by persons on the ground is to be performed at least 10 yards from any trail, road, developed facility, or 25 yards from any interior body of water.
- Scattering shall be distributed in general areas so as not to create a memorial or resource damage.
- The scattering of remains from the air is to be performed at a minimum altitude of 2000 feet above the ground.
- No scattering of remains from the air is to be performed over developed areas, facilities, or inland bodies of water.
- The scattering of remains is prohibited from any bridge, pier, in lake, lagoon or stream, and along beaches.
- The scattering of remains is **prohibited within Muir Woods National Monument.**

PART 3 – BOATING AND WATER USE ACTIVITIES

36 CFR §3.8 – PROHIBITED OPERATIONS

(a)(2) The following areas/sites are designated for the launching or recovery of vessels using a trailer:

- Horseshoe Cove, Fort Baker boat launch

(d)(3) Vessels may not create a wake or exceed 5 mph in the following areas:

- Horseshoe Cove, Fort Baker

Prohibitions or restrictions do not apply to US Army Corp of Engineer operations or U.S. Coast Guard or other emergency search and rescue missions.

36 CFR §3.16 –May I swim or wade in park waters?

(a) The following areas are closed to swimming and bathing:

- ☐ Marin County
 - Rodeo Lagoon and seasonal inlet
 - Rodeo Lake
 - Tennessee Valley Pond (next to beach)
 - Muir Beach (All water bodies, including Redwood Creek, lagoon, seasonal tidal inlets, and other features)
 - Muir Woods National Monument, Redwood Creek (Muir Woods to Ocean)
 - Muir Beach Big Lagoon and seasonal inlet
- ☐ San Francisco
 - Lobos Creek, Baker Beach Presidio
 - Crissy Marsh, south of inlet bridge
- ☐ San Mateo County
 - Mori Point ponds, Mori Point
 - Charthouse Mitigation Site Pond, Rancho Corral de Tierra

The Endangered Species Act and the Organic Act require special protection from the threatened and endangered species and the anadromous fish found in these areas. In addition, this use is not compatible with the protection of wildlife found in and on these waters, or the protection of drinking water quality. This is designed to minimize shoreline erosion at the designated sites and protection of visitor and their pets from occasional poor water quality conditions.

36 CFR §3.17 –What regulations apply to swimming areas and beaches?

(a) Stinson Beach is designated as a swimming beach.

(b) Surfing: Restricted at Stinson Beach, including Kite surfing and kite boarding, when swimmers are present, and allowed only in areas designated as "Non Swimming Areas" and only at such times as are deemed safe by the Supervisory Ranger or by his/her representative

(c) The use of flotation devices, glass containers, kites, or incompatible sporting activities is not permitted on the following swimming beaches:

- ☐ Stinson Beach
 - Flotation devices (inner tubes, air mattresses, boats, rafts, etc.)
 - Glass containers
 - During periods of high visitation and limited open space, incompatible sporting activities such as ball games, kite flying, foot racing, Frisbee will be prohibited. When allowed during periods of lesser visitation, such activities may be restricted to a designated area.

The park receives millions of visitors per year. These restrictions are intended to reduce conflict between users, the amount of injurious debris, and to protect the safety of the visiting public.

PART 4 – VEHICLES AND TRAFFIC SAFETY

36 CFR §4.10 – TRAVEL ON PARK ROADS AND ROUTES

(a) Park roads, open for travel by motor vehicle are those indicated below, and/or as indicated in the following publication or document:

- Park maps and brochures can be found on <http://www.nps.gov/goga>.

(b) The following routes and/or areas, designated pursuant to special regulations, are open for off-road vehicle travel under the terms and conditions noted:

Electric powered mobility assistance devices (e.g. electric scooters or Segway devices) only for the purpose of transporting persons with disabilities are permitted on park roadways and walkways.

The use of Segways and motorized scooters as a mobility assistive device, as outlined above, must also adhere to the following:

- (a) No person under 16 years of age may operate Segways, without adult supervision
- (b) A person shall operate any mobility assistive device in a safe and responsible manner; maximum speed will not exceed more than 12 miles per hour, so as not to endanger one's self or other park visitors.
- (c) A person riding any mobility assistive device on a sidewalk, while crossing a roadway in a crosswalk, entering or exiting an elevator, boarding a vessel, or on any other surface shall have all the rights and duties applicable to a pedestrian under CA VC § 467.
<http://www.dmv.ca.gov/pubs/vctop/d01/vc467.htm>

36 CFR §4.11 – VEHICLE LOAD, WEIGHT and SIZE LIMITS

(a) The following load, weight and size limits, which are more restrictive than State law, apply to the roads indicated under the terms and conditions, and/or under permit as noted:

- Oversized vehicles (over 24 feet), buses, and vehicles with trailers are prohibited in the Marin Headlands on Conzelman Road west of the McCullough road intersection to Field Road.
- Buses and RVs are prohibited in Fort Baker on Satterlee Road.
- Vehicles longer than 35 feet are prohibited from entering Muir Woods NM.
- Vehicles longer than 17 feet are prohibited from entering Muir Woods annex parking lot and Conlon Avenue parking area, Muir Beach parking lot and West Bluff Parking, Crissy Field, Crissy Field East Beach – no vehicles over 24 feet, except school buses or other vehicles operated by nonprofit organizations supporting educational programs in NPS areas.
- SEE PART 5 - BUSINESS OPERATIONS, Commercial Use Authorizations for specific conditions and size limits for vehicles on roads and parking lots.

These size limits are due to the availability of turning radius' on these roads and parking lots in the designated areas. The steep grade of the one way section of Conzelman road prevents the use of oversized vehicles and weights to maintain the established speed limit. Government vehicles are excluded from these restrictions as operational necessities may require vehicles to enter these areas accordingly.

36 CFR §4.21 – SPEED LIMITS

(b) The following speed limits are established for the routes/roads indicated:

- The maximum speed limit on paved park roads is 35 mph unless otherwise posted.

- ☐ The maximum speed limit on graded park roads is 25 mph unless otherwise posted.
- ☐ The speed limit for the **bicycles** in developed areas is 15 mph and 5 mph around blind curves on the following:
 - ☐ San Francisco
 - Great Meadow, Fort Mason
 - Mason Avenue Bike Path on Sidewalk, Crissy Field
 - Crissy Field Promenade
 - McDowell Road, Fort Mason

NOTE: See §7.97(c) for bicycle speed limits in non-developed areas.

Variations from the speed limit designations in the general regulations have been made where road conditions allow either a higher speed without jeopardizing public safety, or require a lower speed limit for public safety and to prevent road deterioration.

36 CFR §4.30 – BICYCLES

(d)(3) WHERE CAN I RIDE A BICYCLE ABREAST OF ANOTHER RIDER?

- ☐ San Francisco
 - Crissy Field Promenade except during special use permit activities.

NOTE: Special regulations pertaining to the use, speed, and equipment associated with bicycles in non-developed areas in Golden Gate National Recreation Area are found in 36 CFR § 7.97(c) and were published in the Federal Register on December 11, 1992 (57 FR 58711).

36 CFR §4.31 – HITCHHIKING

Hitchhiking is permitted in the following areas:

- ☐ Marin County
 - Marin Headlands

San Francisco Muni Public transportation to the Marin Headlands is available on Sundays only. The Baker/Barry tunnel is a one-way traffic controlled tunnel for motor vehicles with bicycle lanes in both directions, and therefore not appropriate to allow pedestrian traffic. By permitting hitchhiking in the Marin Headlands, those visitors without personal transportation visiting the Youth Hostel and other overnight camping facilities will not be forced into non-compliance with other applicable regulations.

PART 5 – COMMERCIAL AND PRIVATE OPERATIONS

36 CFR §5.3 – BUSINESS OPERATIONS

Engaging in commercial activity or business in the park is prohibited unless in accordance with an NPS authorization (Contract, Permit, Commercial Use Authorization, etc.).

☐ **COMMERCIAL USE AUTHORIZATIONS (CUAs)**

CUA Holders are required to comply with all CUA conditions. The following commercial activities (as described in the definitions section of this compendium) are currently authorized by CUA within the park:

Commercial Carriers: Operators that offer commercial transportation service within GGNRA authorized sites more than one (1) time per month are required to obtain a Commercial Use Authorization issued by the Superintendent.

Some specific CUA stipulations include but are not limited to:

- Vehicle size, weight and load limits as described in 4.11 of this compendium
- Idling for more than 30 seconds while loading, unloading or waiting for passengers is prohibited.
- Special conditions and restricted access and parking at Muir Woods National Monument as well as certain roadways and parking lots in San Francisco detailed in the CUA.
- Open-Top Commercial Carriers are prohibited from using public address systems or loudspeakers within lands managed and administered by GGNRA

Guided Services: Operators that offer commercial guided services within the GGNRA Authorized Sites more than four (4) times per year are required to obtain a Commercial Use Authorization issued by the Superintendent.

- Guided Services are not permitted at Muir Woods, Alcatraz, or Fort Point; therefore in these park sites commercial guided services are not authorized.

Outdoor Fitness: Operators that offer fitness programs within the GGNRA more than one (1) time per week, or four (4) times per month, are required to obtain a Commercial Use Authorization issued by the Superintendent.

- Authorized sites for Outdoor Fitness activities within GGNRA are currently limited to Baker Beach, Crissy Field, and Rodeo Beach.

See <http://www.nps.gov/goga/parkmgmt/businesswithpark.htm> for more information as well as complete copies of Commercial Use Authorization permits.

The purpose of the designating which roadways are available for different lengths of buses is for the traffic safety and protection of roads and surfaces on roads or parking areas not designed to carry larger size vehicles or provide for safe passing & turn around. The purpose of restricting Commercial Carriers to three (3) per company, is to reduce congestion in the designated commercial carrier parking area and to continue providing a positive visitor experience overall.

The idling of bus engines adds unnecessary exhaust fumes to the air and diminishes the enjoyment by visitors of the peace and tranquility of the park. Due to the nature of the service provided by the shuttle busses, they are excluded from the requirement.

PART 7 – SPECIAL REGULATIONS

36 CFR § 7.6 No fires or fishing at Muir Woods National Monument

<http://edocket.access.gpo.gov/cfr/2009/julqtr/36cfr7.6.htm>

36 CFR § 7.97 <http://edocket.access.gpo.gov/cfr/2009/julqtr/36cfr7.97.htm>

(a) BOAT LANDINGS ON ALCATRAZ ISLAND: Boat landings--Alcatraz Island. Except in emergencies, the docking of any privately-owned vessel or the landing of any person at Alcatraz Island without a permit or contract is prohibited.

(b) POWERLESS FLIGHT: The use of devices designed to carry persons through the air in powerless flight is allowed at the following locations pursuant to terms and conditions of a permit:

Hang gliding launching and landing is permitted only within designated areas of Fort Funston. Paragliding launching and landing is permitted only within designated areas on the Olympic Club Easement (Fort Funston Stables) and at Mori Point. For more information on these permitted, contact the Business Management Division and/or visit the following websites: Fellow Feathers Hang Gliding (www.flyfunston.org) Bay Area Paragliding Association (<http://sfbapa.org>).

(c)(1) DESIGNATED BICYCLE ROUTES:

- The following routes in undeveloped areas are designated as open to bicycles:

☐ **Marin County**

☐ **MARIN HEADLANDS**

- Alta Trail between Spencer Ave and Marin City
- Baker-Barry Tunnel
- Batteries Loop Trail
- Bay Trail between Golden Gate Bridge and Sausalito.
- Bobcat Trail between Miwok Trail and Marincello Trail.
- Rodeo Valley Trail between Capehart Bridge and Bobcat Trail.
- Capehart and Smith Road Bridges connecting Bunker Road to Rodeo Valley Trail
- Bunker Road Extension (adjacent to the Roads & Trails Maintenance Yard to Battery Townsley)
- Coastal Trail from McCullough Road to Slacker Hill.
- Coastal Trail between Conzelman Road at McCullough and the Fort Barry Rifle Range at Bunker Road (Julian Fire Road).
- Coastal Trail between Rodeo Beach Parking and Hill 88.
- Coastal Trail between Tennessee Valley Trail and Coyote Ridge Trail.
- Coyote Ridge Trail between the Coastal Trail and Miwok Trail.
- Coyote Ridge Trail between the Fox Trail and the Coastal Trail at the Hack Site.
- Coastal Trail between Coyote Ridge Trail at the Hack Site and Muir Beach.
- Drown Road, Fort Baker
- Hawk Camp Trail between Bobcat Trail and Hawk Camp.
- Haypress Road between Tennessee Valley Road and Haypress Campground.
- Kirby Cove Road, between Conzelman and Kirby Cove Campground
- Marincello Trail between Tennessee Valley Parking Area and Bobcat Trail.
- Miwok Trail between Rodeo Lagoon and Old Springs Trail
- Miwok Trail between Miwok Stable and Highway 1
- Oakwood Valley Trail between Tennessee Valley Road and Oakwood Pond (Does not include Oakwood Meadow Trail between Pond and Alta Avenue.)
- Old Springs Trail between Miwok Trail and Miwok Stable.
- Rodeo Avenue Trail between US Highway 101 and Alta Avenue
- Marin Drive/Smith Road between Marinview and Miwok Trail
- Tennessee Valley Trail between Parking Lot and Tennessee Beach

☐ **MUIR WOODS NM / MT. TAMALPAIS AREA**

- Deer Park Fire Road between Frank's Valley Road and Coastal Trail near Pan Toll (Major portion is in Mt. Tamalpais State Park.)
- Dias Ridge Trail between Mt. Tamalpais State Park boundary and Highway 1 near Muir Beach.

☐ **STINSON BEACH**

- Willow Camp Fire Road between Stinson Beach and Ridgecrest Boulevard. (Major portion is in Mt. Tamalpais State Park.)

☐ San Francisco

☐ PRESIDIO

- Coastal Trail, Baker Beach, except Battery to Bluffs Trail Section
- Coastal Trail, Fort Point, except Presidio Promenade

☐ LAND'S END

- Coastal Trail, Land's End up to, but not including, hiking only portion.
- El Camino Del Mar Trail

☐ FORT FUNSTON

- Coastal Trail

☐ San Mateo County

☐ MILAGRA RIDGE

- Milagra Ridge Road
- Milagra Battery Trail
- Milagra Ridge Spur Trail North
- Milagra Ridge Trail North of Spur Trail

☐ MORI POINT

- Lishumsha Trail
- Old Mori Trail
- Upper Mori Trail
- Coastal Trail

☐ SWEENEY RIDGE

- Sneath Lane
- Baquiano Trail
- Mori Ridge Trail
- Sweeney Ridge Trail, except Notch Trail portion
- Sweeney Meadow Trail
- Sweeney Horse Trail

☐ RANCHO CORRAL DE TIERRA

- Le Conte Trail
- Farallone Trail
- Corona Pedro Trail
- Old San Pedro Mountain Road
- San Vicente Trail
- Ranchette Trail
- Farmer's Daughter Trail
- Spine Trail
- French Trail
- Flat Top Trail
- San Carlos Trail
- Ranch Road
- Almeria Trail
- Clipper Ridge Trail

- Deer Creek Trail

(d) SNOWY PLOVER PROTECTION:

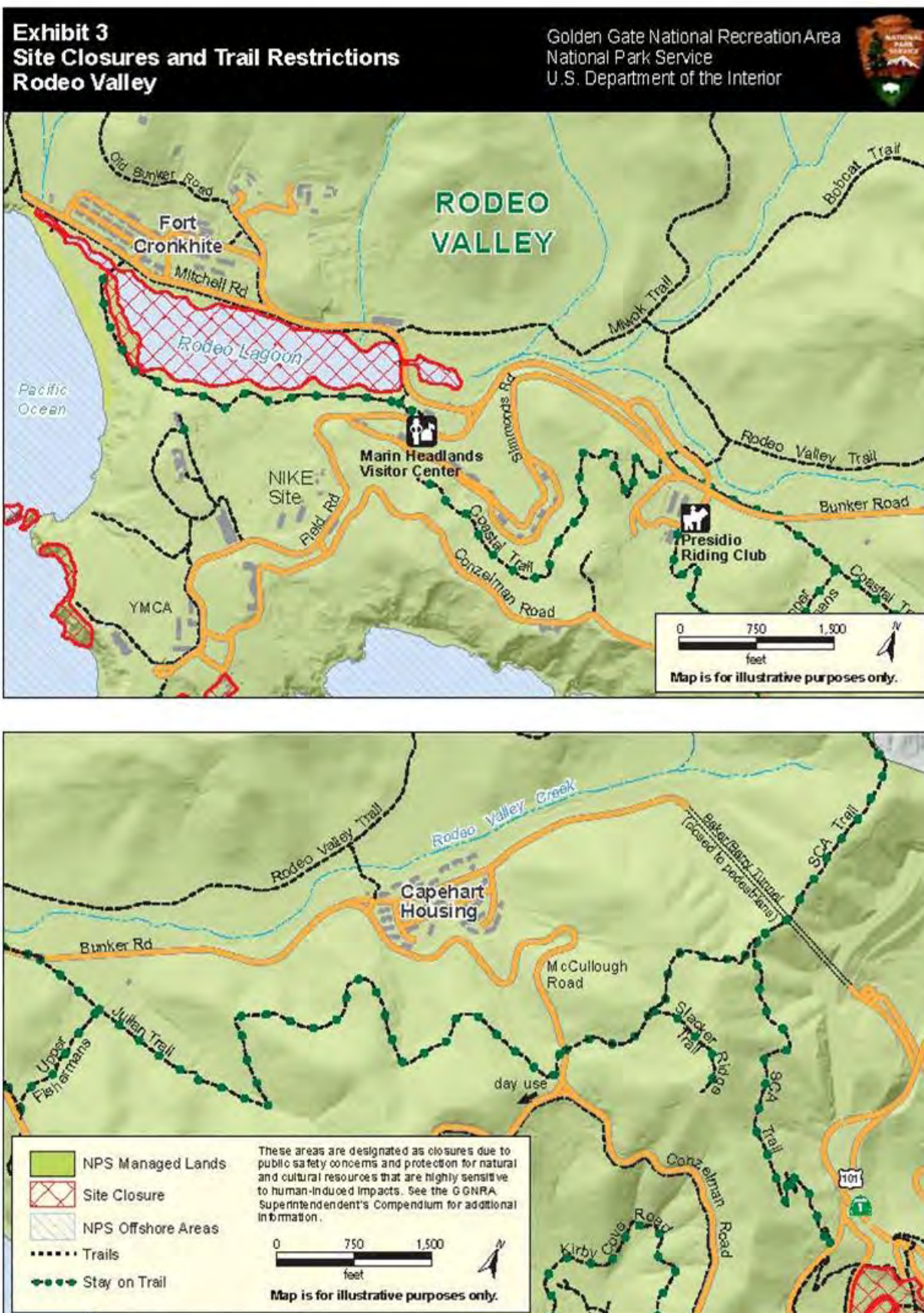
In the Crissy Field Wildlife Protection Area and Ocean Beach Snowy Plover Protection Area:
Dogs are required to be on leash all year except from May 15 to July 1.

COMPENDIUM EXHIBITS

Fort Baker Site Closures & Trail Restrictions	Exhibit #1
Point Bonita Site Closures & Trail Restrictions	Exhibit #2
Rodeo Valley Site Closures & Trail Restrictions	Exhibit #3
Tennessee Valley Site Closures & Trail Restrictions	Exhibit #4
Muir Beach Site Closures & Trail Restrictions	Exhibit #5
Alcatraz Bird Nesting Season Closure & Trail Restrictions	Exhibit #6
Fort Mason Site Closures	Exhibit #7
Fort Point Site Closures & Trail Restrictions	Exhibit #8
Lobos Creek Site Closures & Trail Restrictions	Exhibit #9
Lands End Site Closures & Trail Restrictions	Exhibit #10
Fort Funston Site Closures & Trail Restrictions	Exhibit #11
Crissy Field & Ocean Beach Wildlife Protection Areas	Exhibit #12
Marin County 1979 Pet Policy	Exhibit #13A
San Francisco 1979 Pet Policy & Amending Restrictions	Exhibit #13B
Ocean Beach Permitted Beach Fire Area	Exhibit #14
Marin County Trail Restrictions	Exhibit #15
Milagra Ridge Trail Restrictions	Exhibit #16
Mori Point Trail Restrictions	Exhibit #17
Sweeney Ridge Trail Restrictions	Exhibit #18
Rancho Corral de Tierra Trail Restrictions	Exhibit #19
Phleger Estate Trail Restrictions	Exhibit #20







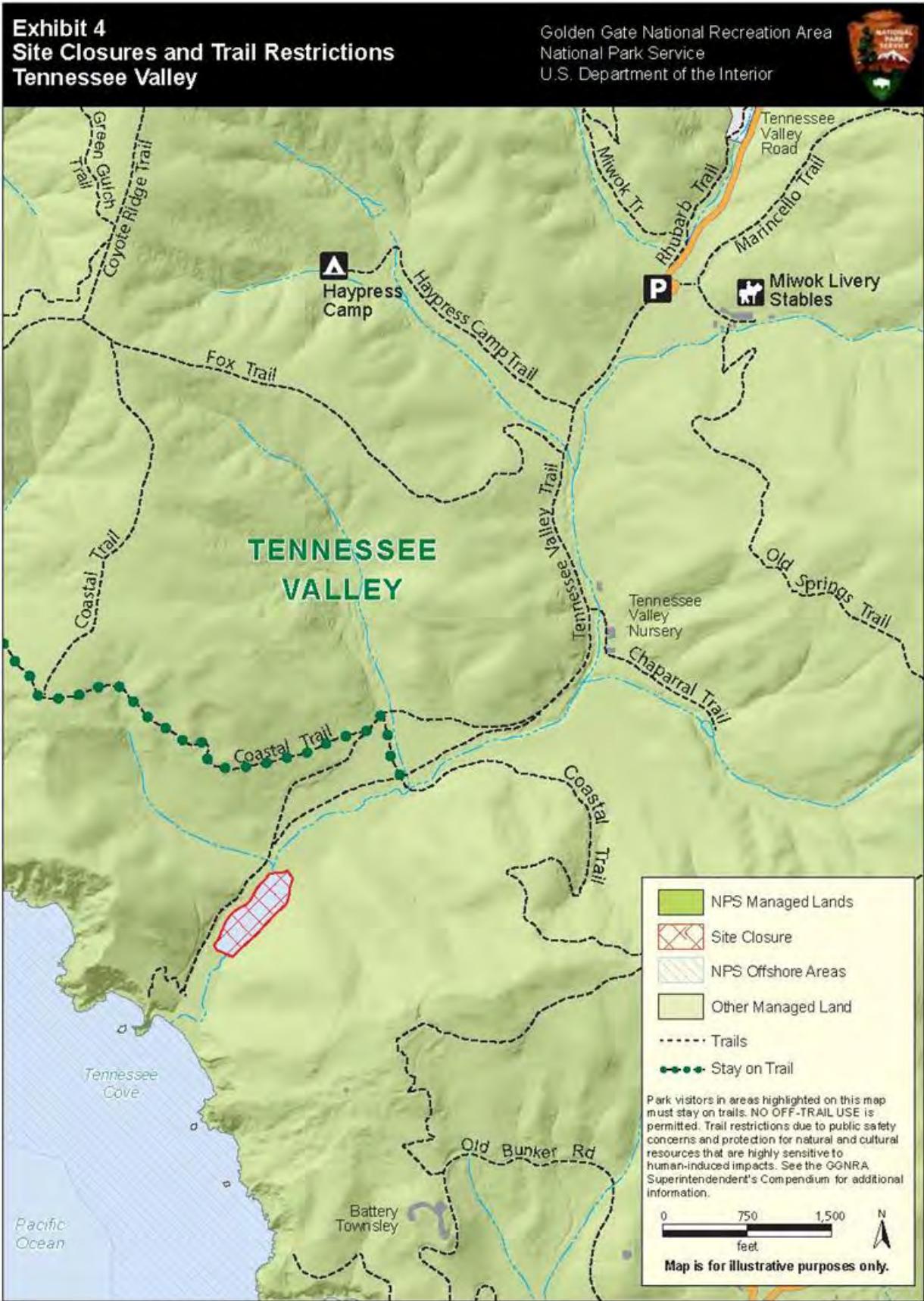


















Exhibit 13A **1979 Pet Policy** **Marin County**

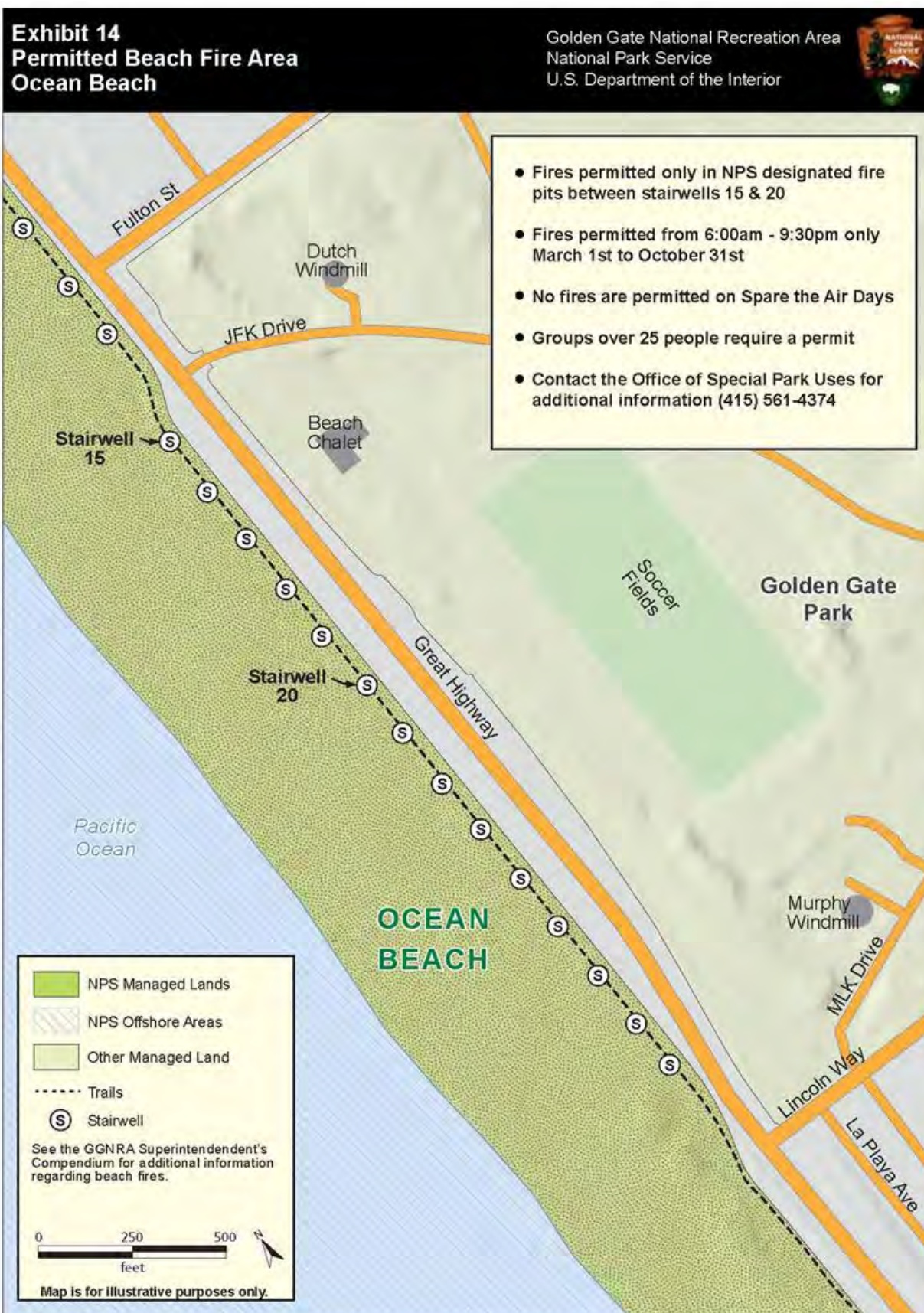
Golden Gate National Recreation Area
 National Park Service
 U.S. Department of the Interior



Exhibit 13B 1979 Pet Policy and Amending Restrictions San Francisco

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





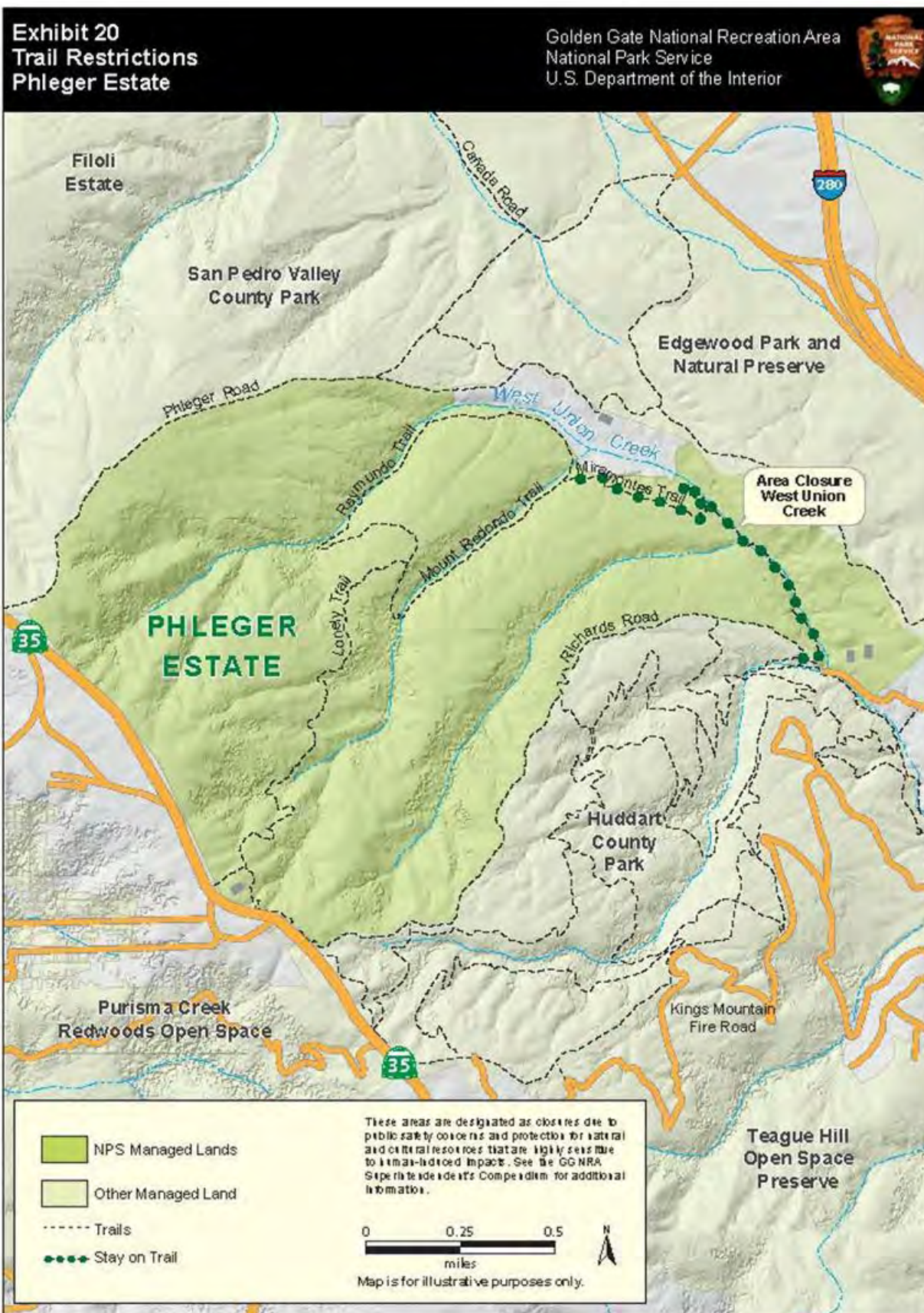












APPENDIX C: GGNRA DOG MANAGEMENT PLAN/EIS DETERMINATION OF NON-IMPAIRMENT

This appendix, which appeared in the draft plan/EIS, has been removed in accordance with recent NPS guidance on determinations of non-impairment for NEPA documents, and will now appear in the Record of Decision.

APPENDIX D: SECTIONS OF TITLES 36 AND 50 OF THE CODE OF FEDERAL REGULATIONS

Title 36: Parks, Forests, and Public Property

PART 1—GENERAL PROVISIONS

§ 1.5 Closures and public use limits.

(a) Consistent with applicable legislation and Federal administrative policies, and based upon a determination that such action is necessary for the maintenance of public health and safety, protection of environmental or scenic values, protection of natural or cultural resources, aid to scientific research, implementation of management responsibilities, equitable allocation and use of facilities, or the avoidance of conflict among visitor use activities, the superintendent may:

- (1) Establish, for all or a portion of a park area, a reasonable schedule of visiting hours, impose public use limits, or close all or a portion of a park area to all public use or to a specific use or activity.
- (2) Designate areas for a specific use or activity, or impose conditions or restrictions on a use or activity.
- (3) Terminate a restriction, limit, closure, designation, condition, or visiting hour restriction imposed under paragraph (a)(1) or (2) of this section.

(b) Except in emergency situations, a closure, designation, use or activity restriction or condition, or the termination or relaxation of such, which is of a nature, magnitude and duration that will result in a significant alteration in the public use pattern of the park area, adversely affect the park's natural, aesthetic, scenic or cultural values, require a long-term or significant modification in the resource management objectives of the unit, or is of a highly controversial nature, shall be published as rulemaking in the Federal Register.

(c) Except in emergency situations, prior to implementing or terminating a restriction, condition, public use limit or closure, the superintendent shall prepare a written determination justifying the action. That determination shall set forth the reason(s) the restriction, condition, public use limit or closure authorized by paragraph (a) has been established, and an explanation of why less restrictive measures will not suffice, or in the case of a termination of a restriction, condition, public use limit or closure previously established under paragraph (a), a determination as to why the restriction is no longer necessary and a finding that the termination will not adversely impact park resources. This determination shall be available to the public upon request.

(d) To implement a public use limit, the superintendent may establish a permit, registration, or reservation system. Permits shall be issued in accordance with the criteria and procedures of §1.6 of this chapter.

(e) Except in emergency situations, the public will be informed of closures, designations, and use or activity restrictions or conditions, visiting hours, public use limits, public use limit procedures, and the termination or relaxation of such, in accordance with §1.7 of this chapter.

(f) Violating a closure, designation, use or activity restriction or condition, schedule of visiting hours, or public use limit is prohibited.

Code of Federal Regulations

Title 36: Parks, Forests, and Public Property

PART 2—RESOURCE PROTECTION, PUBLIC USE AND RECREATION

§ 2.1 Preservation of natural, cultural and archeological resources.

(a) Except as otherwise provided in this chapter, the following is prohibited:

- (1) Possessing, destroying, injuring, defacing, removing, digging, or disturbing from its natural state:
 - (i) Living or dead wildlife or fish, or the parts or products thereof, such as antlers or nests.
 - (ii) Plants or the parts or products thereof.
 - (iii) Nonfossilized and fossilized paleontological specimens, cultural or archeological resources, or the parts thereof.
 - (iv) A mineral resource or cave formation or the parts thereof.
- (2) Introducing wildlife, fish or plants, including their reproductive bodies, into a park area ecosystem.
- (3) Tossing, throwing or rolling rocks or other items inside caves or caverns, into valleys, canyons, or caverns, down hillsides or mountainsides, or into thermal features.
- (4) Using or possessing wood gathered from within the park area: *Provided, however,* That the superintendent may designate areas where dead wood on the ground may be collected for use as fuel for campfires within the park area.
- (5) Walking on, climbing, entering, ascending, descending, or traversing an archeological or cultural resource, monument, or statue, except in designated areas and under conditions established by the superintendent.
- (6) Possessing, destroying, injuring, defacing, removing, digging, or disturbing a structure or its furnishing or fixtures, or other cultural or archeological resources.
- (7) Possessing or using a mineral or metal detector, magnetometer, side scan sonar, other metal detecting device, or subbottom profiler.

This paragraph does not apply to:

- (i) A device broken down and stored or packed to prevent its use while in park areas.
- (ii) Electronic equipment used primarily for the navigation and safe operation of boats and aircraft.
- (iii) Mineral or metal detectors, magnetometers, or subbottom profilers used for authorized scientific, mining, or administrative activities.

(b) The superintendent may restrict hiking or pedestrian use to a designated trail or walkway system pursuant to §§1.5 and 1.7. Leaving a trail or walkway to shortcut between portions of the same trail or walkway, or to shortcut to an adjacent trail or walkway in violation of designated restrictions is prohibited.

(c)(1) The superintendent may designate certain fruits, berries, nuts, or unoccupied seashells which may be gathered by hand for personal use or consumption upon a written determination that the gathering or consumption will not adversely affect park wildlife, the reproductive potential of a plant species, or otherwise adversely affect park resources.

(2) The superintendent may:

- (i) Limit the size and quantity of the natural products that may be gathered or possessed for this purpose; or
- (ii) Limit the location where natural products may be gathered; or
- (iii) Restrict the possession and consumption of natural products to the park area.

(3) The following are prohibited:

- (i) Gathering or possessing undesignated natural products.
- (ii) Gathering or possessing natural products in violation of the size or quantity limits designated by the superintendent.
- (iii) Unauthorized removal of natural products from the park area.
- (iv) Gathering natural products outside of designated areas.
- (v) Sale or commercial use of natural products.

(d) This section shall not be construed as authorizing the taking, use or possession of fish, wildlife or plants for ceremonial or religious purposes, except where specifically authorized by Federal statutory law, treaty rights, or in accordance with §2.2 or §2.3.

Code of Federal Regulations
Title 36: Parks, Forests, and Public Property

PART 2—RESOURCE PROTECTION, PUBLIC USE AND RECREATION

§ 2.2 Wildlife protection.

(a) The following are prohibited:

- (1) The taking of wildlife, except by authorized hunting and trapping activities conducted in accordance with paragraph (b) of this section.
- (2) The feeding, touching, teasing, frightening or intentional disturbing of wildlife nesting, breeding or other activities.
- (3) Possessing unlawfully taken wildlife or portions thereof.

(b) *Hunting and trapping.*

- (1) Hunting shall be allowed in park areas where such activity is specifically mandated by Federal statutory law.
- (2) Hunting may be allowed in park areas where such activity is specifically authorized as a discretionary activity under Federal statutory law if the superintendent determines that such activity is consistent with public safety and enjoyment, and sound resource management principles. Such hunting shall be allowed pursuant to special regulations.
- (3) Trapping shall be allowed in park areas where such activity is specifically mandated by Federal statutory law.
- (4) Where hunting or trapping or both are authorized, such activities shall be conducted in accordance with Federal law and the laws of the State within whose exterior boundaries a park area or a portion thereof is located. Nonconflicting State laws are adopted as a part of these regulations.

(c) Except in emergencies or in areas under the exclusive jurisdiction of the United States, the superintendent shall consult with appropriate State agencies before invoking the authority of §1.5 for the purpose of restricting hunting and trapping or closing park areas to the taking of wildlife where such activities are mandated or authorized by Federal statutory law.

(d) The superintendent may establish conditions and procedures for transporting lawfully taken wildlife through the park area. Violation of these conditions and procedures is prohibited.

(e) The Superintendent may designate all or portions of a park area as closed to the viewing of wildlife with an artificial light. Use of an artificial light for purposes of viewing wildlife in closed areas is prohibited.

(f) Authorized persons may check hunting and trapping licenses and permits; inspect weapons, traps and hunting and trapping gear for compliance with equipment restrictions; and inspect wildlife that has been taken for compliance with species, size and other taking restrictions.

(g) The regulations contained in this section apply, regardless of land ownership, on all lands and waters within a park area that are under the legislative jurisdiction of the United States.

[48 FR 30282, June 30, 1983, as amended at 49 FR 18450, Apr. 30, 1984; 51 FR 33264, Sept. 19, 1986; 52 FR 35240, Sept. 18, 1987]

Title 36: Parks, Forests, and Public Property

PART 2—RESOURCE PROTECTION, PUBLIC USE AND RECREATION

§ 2.3 Fishing.

(a) Except in designated areas or as provided in this section, fishing shall be in accordance with the laws and regulations of the State within whose exterior boundaries a park area or portion thereof is located. Nonconflicting State laws are adopted as a part of these regulations.

(b) State fishing licenses are not required in Big Bend, Crater Lake, Denali, Glacier, Isle Royale (inland waters only), Mammoth Cave, Mount Rainer, Olympic and Yellowstone National Parks.

(c) Except in emergencies or in areas under the exclusive jurisdiction of the United States, the superintendent shall consult with appropriate State agencies before invoking the authority of §1.5 for the purpose of restricting or closing park areas to the taking of fish.

(d) The following are prohibited:

(1) Fishing in fresh waters in any manner other than by hook and line, with the rod or line being closely attended.

(2) Possessing or using as bait for fishing in fresh waters, live or dead minnows or other bait fish, amphibians, nonpreserved fish eggs or fish roe, except in designated waters. Waters which may be so designated shall be limited to those where non-native species are already established, scientific data indicate that the introduction of additional numbers or types of non-native species would not impact populations of native species adversely, and park management plans do not call for elimination of non-native species.

(3) Chumming or placing preserved or fresh fish eggs, fish roe, food, fish parts, chemicals, or other foreign substances in fresh waters for the purpose of feeding or attracting fish in order that they may be taken.

(4) Commercial fishing, except where specifically authorized by Federal statutory law.

(5) Fishing by the use of drugs, poisons, explosives, or electricity.

(6) Digging for bait, except in privately owned lands.

(7) Failing to return carefully and immediately to the water from which it was taken a fish that does not meet size or species restrictions or that the person chooses not to keep. Fish so released shall not be included in the catch or possession limit: *Provided*, That at the time of catching the person did not possess the legal limit of fish.

(8) Fishing from motor road bridges, from or within 200 feet of a public raft or float designated for water sports, or within the limits of locations designated as swimming beaches, surfing areas, or public boat docks, except in designated areas.

(e) Except as otherwise designated, fishing with a net, spear, or weapon in the salt waters of park areas shall be in accordance with State law.

(f) Authorized persons may check fishing licenses and permits; inspect creels, tackle and fishing gear for compliance with equipment restrictions; and inspect fish that have been taken for compliance with species, size and other taking restrictions.

(g) The regulations contained in this section apply, regardless of land ownership, on all lands and waters within a park area that are under the legislative jurisdiction of the United States.

[48 FR 30282, June 30, 1983, as amended at 52 FR 35240, Sept. 18, 1987]

**Code of Federal Regulations
Title 36: Parks, Forests, and Public Property**

PART 2—RESOURCE PROTECTION, PUBLIC USE AND RECREATION

§ 2.15 Pets.

(a) The following are prohibited:

(1) Possessing a pet in a public building, public transportation vehicle, or location designated as a swimming beach, or any structure or area closed to the possession of pets by the superintendent. This subparagraph shall not apply to guide dogs accompanying visually impaired persons or hearing ear dogs accompanying hearing-impaired persons.

(2) Failing to crate, cage, restrain on a leash which shall not exceed six feet in length, or otherwise physically confine a pet at all times.

(3) Leaving a pet unattended and tied to an object, except in designated areas or under conditions which may be established by the superintendent.

(4) Allowing a pet to make noise that is unreasonable considering location, time of day or night, impact on park users, and other relevant factors, or that frightens wildlife by barking, howling, or making other noise.

(5) Failing to comply with pet excrement disposal conditions which may be established by the superintendent.

(b) In park areas where hunting is allowed, dogs may be used in support of these activities in accordance with applicable Federal and State laws and in accordance with conditions which may be established by the superintendent.

(c) Pets or feral animals that are running-at-large and observed by an authorized person in the act of killing, injuring or molesting humans, livestock, or wildlife may be destroyed if necessary for public safety or protection of wildlife, livestock, or other park resources.

(d) Pets running-at-large may be impounded, and the owner may be charged reasonable fees for kennel or boarding costs, feed, veterinarian fees, transportation costs, and disposal. An impounded pet may be put up for adoption or otherwise disposed of after being held for 72 hours from the time the owner was notified of capture or 72 hours from the time of capture if the owner is unknown.

(e) Pets may be kept by residents of park areas consistent with the provisions of this section and in accordance with conditions which may be established by the superintendent. Violation of these conditions is prohibited.

(f) This section does not apply to dogs used by authorized Federal, State and local law enforcement officers in the performance of their official duties.

**Code of Federal Regulations
Title 36: Parks, Forests, and Public Property**

PART 2—RESOURCE PROTECTION, PUBLIC USE AND RECREATION

§ 2.34 Disorderly conduct.

(a) A person commits disorderly conduct when, with intent to cause public alarm, nuisance, jeopardy or violence, or knowingly or recklessly creating a risk thereof, such person commits any of the following prohibited acts:

(1) Engages in fighting or threatening, or in violent behavior.

(2) Uses language, an utterance, or gesture, or engages in a display or act that is obscene, physically threatening or menacing, or done in a manner that is likely to inflict injury or incite an immediate breach of the peace.

(3) Makes noise that is unreasonable, considering the nature and purpose of the actor's conduct, location, time of day or night, and other factors that would govern the conduct of a reasonably prudent person under the circumstances.

(4) Creates or maintains a hazardous or physically offensive condition.

(b) The regulations contained in this section apply, regardless of land ownership, on all lands and waters within a park area that are under the legislative jurisdiction of the United States.

[48 FR 30282, June 30, 1983, as amended at 52 FR 35240, Sept. 18, 1987]

Title 50: Wildlife and Fisheries

PART 17—ENDANGERED AND THREATENED WILDLIFE AND PLANTS

Subpart A—Introduction and General Provisions

§ 17.3 Definitions.

In addition to the definitions contained in part 10 of this subchapter, and unless the context otherwise requires, in this part 17:

Act means the Endangered Species Act of 1973 (16 U.S.C. 1531–1543; 87 Stat. 884);

Adequately covered means, with respect to species listed pursuant to section 4 of the ESA, that a proposed conservation plan has satisfied the permit issuance criteria under section 10(a)(2)(B) of the ESA for the species covered by the plan, and, with respect to unlisted species, that a proposed conservation plan has satisfied the permit issuance criteria under section 10(a)(2)(B) of the ESA that would otherwise apply if the unlisted species covered by the plan were actually listed. For the Services to cover a species under a conservation plan, it must be listed on the section 10(a)(1)(B) permit.

Alaskan Native means a person defined in the Alaska Native Claims Settlement Act (43 U.S.C. 1603(b) (85 Stat. 588)) as a citizen of the United States who is of one-fourth degree or more Alaska Indian (including Tsimshian Indians enrolled or not enrolled in the Metlakatla Indian Community), Eskimo, or Aleut blood, or combination thereof. The term includes any Native, as so defined, either or both of whose adoptive parents are not Natives. It also includes, in the absence of proof of a minimum blood quantum, any citizen of the United States who is regarded as an Alaska Native by the Native village or town of which he claims to be a member and whose father or mother is (or, if deceased, was) regarded as Native by any Native village or Native town. Any citizen enrolled by the Secretary pursuant to section 5 of the Alaska Native Claims Settlement Act shall be conclusively presumed to be an Alaskan Native for purposes of this part;

Authentic native articles of handicrafts and clothing means items made by an Indian, Aleut, or Eskimo that are composed wholly or in some significant respect of natural materials and are significantly altered from their natural form and are produced, decorated, or fashioned in the exercise of traditional native handicrafts without the use of pantographs, multiple carvers, or similar mass-copying devices. Improved methods of production utilizing modern implements such as sewing machines or modern techniques at a tannery registered pursuant to §18.23(c) of this subchapter (in the case of marine mammals) may be used as long as no large-scale mass production industry results. Traditional native handicrafts include, but are not limited to, weaving, carving, stitching, sewing, lacing, beading, drawing, and painting. The formation of traditional native groups, such as cooperatives, is permitted as long as no large-scale mass production results;

Bred in captivity or captive-bred refers to wildlife, including eggs, born or otherwise produced in captivity from parents that mated or otherwise transferred gametes in captivity, if reproduction is sexual, or from parents that were in captivity when development of the progeny began, if development is asexual.

Captivity means that living wildlife is held in a controlled environment that is intensively manipulated by man for the purpose of producing wildlife of the selected species, and that has boundaries designed to prevent animal, eggs or gametes of the selected species from entering or leaving the controlled environment. General characteristics of captivity may include but are not limited to artificial housing, waste removal, health care, protection from predators, and artificially supplied food.

Changed circumstances means changes in circumstances affecting a species or geographic area covered by a conservation plan or agreement that can reasonably be anticipated by plan or agreement developers and the Service and that can be planned for (e.g., the listing of new species, or a fire or other natural catastrophic event in areas prone to such events).

Conservation plan means the plan required by section 10(a)(2)(A) of the ESA that an applicant must submit when applying for an incidental take permit. Conservation plans also are known as "habitat conservation plans" or "HCPs."

Conserved habitat areas means areas explicitly designated for habitat restoration, acquisition, protection, or other conservation purposes under a conservation plan.

Convention means the Convention on International Trade in Endangered Species of Wild Fauna and Flora, TIAS 8249.

Enhance the propagation or survival, when used in reference to wildlife in captivity, includes but is not limited to the following activities when it can be shown that such activities would not be detrimental to the survival of wild or captive populations of the affected species:

- (a) Provision of health care, management of populations by culling, contraception, euthanasia, grouping or handling of wildlife to control survivorship and reproduction, and similar normal practices of animal husbandry needed to maintain captive populations that are self-sustaining and that possess as much genetic vitality as possible;
- (b) Accumulation and holding of living wildlife that is not immediately needed or suitable for propagative or scientific purposes, and the transfer of such wildlife between persons in order to relieve crowding or other problems hindering the propagation or survival of the captive population at the location from which the wildlife would be removed; and
- (c) Exhibition of living wildlife in a manner designed to educate the public about the ecological role and conservation needs of the affected species.

Endangered means a species of wildlife listed in §17.11 or a species of plant listed in §17.12 and designated as endangered.

Harass in the definition of "take" in the Act means an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. This definition, when applied to captive wildlife, does not include generally accepted:

- (1) Animal husbandry practices that meet or exceed the minimum standards for facilities and care under the Animal Welfare Act,
- (2) Breeding procedures, or
- (3) Provisions of veterinary care for confining, tranquilizing, or anesthetizing, when such practices, procedures, or provisions are not likely to result in injury to the wildlife.

Harm in the definition of "take" in the Act means an act which actually kills or injures wildlife. Such act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering.

Incidental taking means any taking otherwise prohibited, if such taking is incidental to, and not the purpose of, the carrying out of an otherwise lawful activity.

Industry or trade in the definition of "commercial activity" in the Act means the actual or intended transfer of wildlife or plants from one person to another person in the pursuit of gain or profit;

Native village or town means any community, association, tribe, clan or group;

Operating conservation program means those conservation management activities which are expressly agreed upon and described in a conservation plan or its Implementing Agreement, if any, and which are to be undertaken for the affected species when implementing an approved conservation plan, including measures to respond to changed circumstances.

Population means a group of fish or wildlife in the same taxon below the subspecific level, in common spatial arrangement that interbreed when mature;

Properly implemented conservation plan means any conservation plan, Implementing Agreement and permit whose commitments and provisions have been or are being fully implemented by the permittee.

Property owner with respect to agreements outlined under §§17.22(c), 17.22(d), 17.32(c), and 17.32(d) means a person with a fee simple, leasehold, or other property interest (including owners of water or other natural resources), or any other entity that may have a property interest, sufficient to carry out the proposed management activities, subject to applicable State law, on non-Federal land.

Specimen means any animal or plant, or any part, product, egg, seed or root of any animal or plant;

Subsistence means the use of endangered or threatened wildlife for food, clothing, shelter, heating, transportation and other uses necessary to maintain the life of the taker of the wildlife, or those who depend upon the taker to provide them with such subsistence, and includes selling any edible portions of such wildlife in native villages and towns in Alaska for native consumption within native villages and towns;

Threatened means a species of wildlife listed in §17.11 or plant listed in §17.12 and designated as threatened.

Unforeseen circumstances means changes in circumstances affecting a species or geographic area covered by a conservation plan or agreement that could not reasonably have been anticipated by plan or agreement developers and the Service at the time of the conservation plan's or agreement's negotiation and development, and that result in a substantial and adverse change in the status of the covered species.

Wasteful manner means any taking or method of taking which is likely to result in the killing or injury of endangered or threatened wildlife beyond those needed for subsistence purposes, or which results in the waste of a substantial portion of the wildlife, and includes without limitation the employment of a method of taking which is not likely to assure the capture or killing of the wildlife, or which is not immediately followed by a reasonable effort to retrieve the wildlife.

[40 FR 44415, Sept. 26, 1975, as amended at 42 FR 28056, June 1, 1977; 44 FR 54006, Sept. 17, 1979; 46 FR 54750, Nov. 4, 1981; 47 FR 31387, July 20, 1982; 50 FR 39687, Sept. 30, 1985; 63 FR 8870, Feb. 23, 1998; 63 FR 48639, Sept. 11, 1998; 69 FR 24092, May 3, 2004; 71 FR 46870, Aug. 15, 2006]

Title 50: Wildlife and Fisheries

PART 17—ENDANGERED AND THREATENED WILDLIFE AND PLANTS

Subpart C—Endangered Wildlife

§ 17.21 Prohibitions.

(a) Except as provided in subpart A of this part, or under permits issued pursuant to §17.22 or §17.23, it is unlawful for any person subject to the jurisdiction of the United States to commit, to attempt to commit, to solicit another to commit or to cause to be committed, any of the acts described in paragraphs (b) through (f) of this section in regard to any endangered wildlife.

(b) *Import or export.* It is unlawful to import or to export any endangered wildlife. Any shipment in transit through the United States is an importation and an exportation, whether or not it has entered the country for customs purposes.

(c) *Take.* (1) It is unlawful to take endangered wildlife within the United States, within the territorial sea of the United States, or upon the high seas. The high seas shall be all waters seaward of the territorial sea of the United States, except waters officially recognized by the United States as the territorial sea of another country, under international law.

(2) Notwithstanding paragraph (c)(1) of this section, any person may take endangered wildlife in defense of his own life or the lives of others.

(3) Notwithstanding paragraph (c)(1) of this section, any employee or agent of the Service, any other Federal land management agency, the National Marine Fisheries Service, or a State conservation agency, who is designated by his agency for such purposes, may, when acting in the course of his official duties, take endangered wildlife without a permit if such action is necessary to:

(i) Aid a sick, injured or orphaned specimen; or

(ii) Dispose of a dead specimen; or

(iii) Salvage a dead specimen which may be useful for scientific study; or

(iv) Remove specimens which constitute a demonstrable but nonimmediate threat to human safety, provided that the taking is done in a humane manner; the taking may involve killing or injuring only if it has not been reasonably possible to eliminate such threat by live-capturing and releasing the specimen unharmed, in a remote area.

(4) Any taking under paragraphs (c)(2) and (3) of this section must be reported in writing to the U.S. Fish and Wildlife Service, Office of Law Enforcement, 4401 North Fairfax Drive, LE-3000, Arlington, VA 22203, within five days. The specimen may only be retained, disposed of, or salvaged under directions from the Office of Law Enforcement.

(5) Notwithstanding paragraph (c)(1) of this section, any qualified employee or agent of a State Conservation Agency which is a party to a Cooperative Agreement with the Service in accordance with section 6(c) of the Act, who is designated by his agency for such purposes, may, when acting in the course of his official duties take those endangered species which are covered by an approved cooperative agreement for conservation programs in accordance with the Cooperative Agreement, provided that such taking is not reasonably anticipated to result in:

(i) The death or permanent disabling of the specimen;

(ii) The removal of the specimen from the State where the taking occurred;

(iii) The introduction of the specimen so taken, or of any progeny derived from such a specimen, into an area beyond the historical range of the species; or

(iv) The holding of the specimen in captivity for a period of more than 45 consecutive days.

(6) Notwithstanding paragraph (c)(1) of this section, any person acting under a valid migratory bird rehabilitation permit issued pursuant to §21.31 of this subchapter may take endangered migratory birds without an endangered species permit if such action is necessary to aid a sick, injured, or orphaned endangered migratory bird, provided the permittee:

(i) Notifies the issuing Migratory Bird Permit Office immediately upon receipt of such bird (contact information for your issuing office is listed on your permit and on the Internet at <http://offices.fws.gov>); and

(ii) Disposes of or transfers such birds, or their parts or feathers, as directed by the Migratory Bird Permit Office.

(7) Notwithstanding paragraph (c)(1) of this section, persons exempt from the permit requirements of §21.12(c) and (d) of this subchapter may take sick and injured endangered migratory birds without an endangered species permit in performing the activities authorized under §21.12(c) and (d).

(d) *Possession and other acts with unlawfully taken wildlife.* (1) It is unlawful to possess, sell, deliver, carry, transport, or ship, by any means whatsoever, any endangered wildlife which was taken in violation of paragraph (c) of this section.

Example. A person captures a whooping crane in Texas and gives it to a second person, who puts it in a closed van and drives thirty miles, to another location in Texas. The second person then gives the whooping crane to a third person, who is apprehended with the bird in his possession. All three have violated the law—the first by illegally taking the whooping crane; the second by transporting an illegally taken whooping crane; and the third by possessing an illegally taken whooping crane.

(2) Notwithstanding paragraph (d)(1) of this section, Federal and State law enforcement officers may possess, deliver, carry, transport or ship any endangered wildlife taken in violation of the Act as necessary in performing their official duties.

(3) Notwithstanding paragraph (d)(1) of this section, any person acting under a valid migratory bird rehabilitation permit issued pursuant to §21.31 of this subchapter may possess and transport endangered migratory birds without an endangered species permit when such action is necessary to aid a sick, injured, or orphaned endangered migratory bird, provided the permittee:

(i) Notifies the issuing Migratory Bird Permit Office immediately upon receipt of such bird (contact information for your issuing office is listed on your permit and on the Internet at <http://offices.fws.gov>); and

(ii) Disposes of or transfers such birds, or their parts or feathers, as directed by the Migratory Bird Permit Office.

(4) Notwithstanding paragraph (d)(1) of this section, persons exempt from the permit requirements of §21.12(c) and (d) of this subchapter may possess and transport sick and injured endangered migratory bird species without an endangered species permit in performing the activities authorized under §21.12(c) and (d).

(e) *Interstate or foreign commerce.* It is unlawful to deliver, receive, carry transport, or ship in interstate or foreign commerce, by any means whatsoever, and in the course of a commercial activity, any endangered wildlife.

(f) *Sale or offer for sale.* (1) It is unlawful to sell or to offer for sale in interstate or foreign commerce any endangered wildlife.

(2) An advertisement for the sale of endangered wildlife which carries a warning to the effect that no sale may be consummated until a permit has been obtained from the U.S. Fish and Wildlife Service shall not be considered an offer for sale within the meaning of this section.

(g) *Captive-bred wildlife.* (1) Notwithstanding paragraphs (b), (c), (e) and (f) of this section, any person may take; export or re-import; deliver, receive, carry, transport or ship in interstate or foreign commerce, in the course of a

commercial activity; or sell or offer for sale in interstate or foreign commerce any endangered wildlife that is bred in captivity in the United States provided either that the wildlife is of a taxon listed in paragraph (g)(6) of this section, or that the following conditions are met:

(i) The wildlife is of a species having a natural geographic distribution not including any part of the United States, or the wildlife is of a species that the Director has determined to be eligible in accordance with paragraph (g)(5) of this section;

(ii) The purpose of such activity is to enhance the propagation or survival of the affected species;

(iii) Such activity does not involve interstate or foreign commerce, in the course of a commercial activity, with respect to non-living wildlife;

(iv) Each specimen of wildlife to be re-imported is uniquely identified by a band, tattoo or other means that was reported in writing to an official of the Service at a port of export prior to export from the United States; and

(v) Any person subject to the jurisdiction of the United States who engages in any of the activities authorized by this paragraph does so in accordance with paragraphs (g) (2), (3) and (4) of this section, and with all other applicable regulations in this Subchapter B.

(2) Any person subject to the jurisdiction of the United States seeking to engage in any of the activities authorized by this paragraph must first register with the Service (Office of Management Authority, U.S. Fish and Wildlife Service, 4401 N. Fairfax Drive, Arlington, Virginia 22203). Requests for registration must be submitted on an official application form (Form 3-200-41) provided by the Service, and must include the following information:

(i) The types of wildlife sought to be covered by the registration, identified by common and scientific name to the taxonomic level of family, genus or species;

(ii) A description of the applicant's experience in maintaining and propagating the types of wildlife sought to be covered by the registration, and when appropriate, in conducting research directly related to maintaining and propagating such wildlife;

(iii) Photograph(s) or other evidence clearly depicting the facilities where such wildlife will be maintained; and

(iv) a copy of the applicant's license or registration, if any, under the animal welfare regulations of the U.S. Department of Agriculture (9 CFR part 2).

(3) Upon receiving a complete application, the Director will decide whether or not the registration will be approved. In making this decision, the Director will consider, in addition to the general criteria in §13.21(b) of this subchapter, whether the expertise, facilities or other resources available to the applicant appear adequate to enhance the propagation or survival of the affected wildlife. Public education activities may not be the sole basis to justify issuance of a registration or to otherwise establish eligibility for the exception granted in paragraph (g)(1) of this section. Each person so registered must maintain accurate written records of activities conducted under the registration, and allow reasonable access to Service agents for inspection purposes as set forth in §§13.46 and 13.47. Each person registered must submit to the Director an individual written annual report of activities, including all births, deaths and transfers of any type.

(4) Any person subject to the jurisdiction of the United States seeking to export or conduct foreign commerce in captive-bred endangered wildlife that will not remain under the care of that person must first obtain approval by providing written evidence to satisfy the Director that the proposed recipient of the wildlife has expertise, facilities or other resources adequate to enhance the propagation or survival of such wildlife and that the proposed recipient will use such wildlife for purposes of enhancing the propagation or survival of the affected species.

(5)(i) The Director will use the following criteria to determine if wildlife of any species having a natural geographic distribution that includes any part of the United States is eligible for the provisions of this paragraph:

(A) Whether there is a low demand for taking of the species from wild populations, either because of the success of captive breeding or because of other reasons, and

(B) Whether the wild populations of the species are effectively protected from unauthorized taking as a result of the inaccessibility of their habitat to humans or as a result of the effectiveness of law enforcement.

(ii) The Director will follow the procedures set forth in the Act and in the regulations thereunder with respect to petitions and notification of the public and governors of affected States when determining the eligibility of species for purposes of this paragraph.

(iii) In accordance with the criteria in paragraph (g)(5)(i) of this section, the Director has determined the following species to be eligible for the provisions of this paragraph:

Laysan duck (*Anas laysanensis*).

(6) Any person subject to the jurisdiction of the United States seeking to engage in any of the activities authorized by paragraph (g)(1) of this section may do so without first registering with the Service with respect to the bar-tailed pheasant (*Symaticus humiae*), Elliot's pheasant (*S. ellioti*), Mikado pheasant (*S. mikado*), brown eared pheasant (*Crossoptilon mantchuricum*), white eared pheasant (*C. crossoptilon*), cheer pheasant (*Catreus wallichii*), Edward's pheasant (*Lophura edwardsi*), Swinhoe's pheasant (*L. swinhoii*), Chinese monal (*Lophophorus lhuysii*), and Palawan peacock pheasant (*Polyplectron emphanum*); parakeets of the species *Neophema pulchella* and *N. splendida*; the Laysan duck (*Anas laysanensis*); the white-winged wood duck (*Cairina scutulata*); and the inter-subspecific crossed or "generic" tiger (*Panthera tigris*) (i.e., specimens not identified or identifiable as members of the Bengal, Sumatran, Siberian or Indochinese subspecies (*Panthera tigris tigris*, *P.t. sumatrae*, *P.t. altaica* and *P.t. corbetti*, respectively) provided:

(i) The purpose of such activity is to enhance the propagation or survival of the affected exempted species;

(ii) Such activity does not involve interstate or foreign commerce, in the course of a commercial activity, with respect to non-living wildlife;

(iii) Each specimen to be re-imported is uniquely identified by a band, tattoo or other means that was reported in writing to an official of the Service at a port of export prior to export of the specimen from the United States;

(iv) No specimens of the taxa in this paragraph (g)(6) of this section that were taken from the wild may be imported for breeding purposes absent a definitive showing that the need for new bloodlines can only be met by wild specimens, that suitable foreign-bred, captive individuals are unavailable, and that wild populations can sustain limited taking, and an import permit is issued under §17.22;

(v) Any permanent exports of such specimens meet the requirements of paragraph (g)(4) of this section; and

(vi) Each person claiming the benefit of the exception in paragraph (g)(1) of this section must maintain accurate written records of activities, including births, deaths and transfers of specimens, and make those records accessible to Service agents for inspection at reasonable hours as set forth in §§13.46 and 13.47.

(h) *U.S. captive-bred scimitar-horned oryx, addax, and dama gazelle* . Notwithstanding paragraphs (b), (c), (e), and (f) of this section, any person subject to the jurisdiction of the United States may take; export or re-import; deliver, receive, carry, transport or ship in interstate or foreign commerce, in the course of a commercial activity; or sell or offer for sale in interstate or foreign commerce live wildlife, including embryos and gametes, and sport-hunted trophies of scimitar-horned oryx (*Oryx dammah*), addax (*Addax nasomaculatus*), and dama gazelle (*Gazella dama*) provided:

(1) The purpose of such activity is associated with the management or transfer of live wildlife, including embryos and gametes, or sport hunting in a manner that contributes to increasing or sustaining captive numbers or to potential reintroduction to range countries;

(2) The specimen was captive-bred, in accordance with §17.3, within the United States;

(3) All live specimens of that species held by the captive-breeding operation are managed in a manner that prevents hybridization of the species or subspecies.

(4) All live specimens of that species held by the captive-breeding operation are managed in a manner that maintains genetic diversity.

(5) Any export of or foreign commerce in a specimen meets the requirements of paragraph (g)(4) of this section, as well as parts 13, 14, and 23 of this chapter;

(6) Each specimen to be re-imported is uniquely identified by a tattoo or other means that is reported on the documentation required under paragraph (h)(5) of this section; and

(7) Each person claiming the benefit of the exception of this paragraph (h) must maintain accurate written records of activities, including births, deaths, and transfers of specimens, and make those records accessible to Service officials for inspection at reasonable hours set forth in §§13.46 and 13.47 of this chapter.

(8) The sport-hunted trophy consists of raw or tanned parts, such as bones, hair, head, hide, hooves, horns, meat, skull, rug, taxidermied head, shoulder, or full body mount, of a specimen that was taken by the hunter during a sport hunt for personal use. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items for commercial purposes.

[40 FR 44415, Sept. 26, 1975, as amended at 40 FR 53400, Nov. 18, 1975; 41 FR 19226, May 11, 1976; 44 FR 31580, May 31, 1979; 44 FR 54007, Sept. 17, 1979; 58 FR 68325, Dec. 27, 1993; 63 FR 48640, Sept. 11, 1998; 68 FR 2919, Jan. 22, 2003; 68 FR 61136, Oct. 27, 2003; 70 FR 52318, Sept. 2, 2005]

APPENDIX E: DOG WALKING REQUIREMENTS

GOLDEN GATE NATIONAL RECREATION AREA DOG MANAGEMENT PLAN/EIS

The following list summarizes the requirements that apply to dog walking in the 22 locations addressed by this plan. This list has been revised since the draft plan / supplemental environmental impact statement to more closely follow the language of the proposed rule where appropriate. Once published, the Final Rule will contain the regulatory provisions that will be enforceable in the field by authorized law enforcement personnel.

- Dog walking means the act of walking with or engaging in any other activity with a dog where the dog is present on lands or waters administered by the National Park Service (NPS) in the 22 locations addressed by this plan. Persons whose dogs are fully confined in a vehicle are not considered to be engaged in dog walking.
- All areas open to dog walking, including voice and sight control areas (VCSAs), are subject to the monitoring-based management program to encourage compliance and ensure protection of park resources, visitors and staff.
 - Primary management responses will be implemented when the level of compliance is approaching an unacceptable level based on the number or type of violations and/or impacts to resources and/or other visitors. Primary management responses may include focused enforcement of regulations, proposed fine increases, increased outreach and education, a specific training certification program with dog tags for anyone walking or bringing off-leash dogs into the park, time of use restrictions, establishment of buffer zones, fencing, barriers or separations, and special use permit (SUP) restrictions.
 - Secondary management responses will be implemented when primary management actions do not adequately improve compliance or address impacts of concern. Secondary management responses may include additional training certification program elements required for use of VSCAs, limiting the number of dogs off-leash at any one time, short or long-term closures to dog walking areas, and/or increases in expansion of buffer zones or implementation of other landscape design solutions that include the adjustment of defined VSCA areas. A short-term closure is a closure contained in the GGNRA Compendium, typically less than 1–2 years in length. A long-term closure is typically longer than 1–2 years in length, and would likely require a special regulation. Long-term closures could be reopened in the future. Note that primary management responses may continue to apply. The NPS will evaluate whether to propose secondary management responses if compliance rates are approaching unacceptable based on, at a minimum, annual monitoring data in one area.
- All dogs must have current licenses and proof of current rabies vaccinations in accordance with the applicable ordinances of the dog owner's county of residence.
 - In counties with rabies vaccination and licensing requirements, the dog must wear the county-issued identification tag at all times, displaying a current license with access to the owner's information (name, home address, phone number, etc.).
 - In counties without rabies vaccination or licensing requirements, or where tag and current licensing information is not available as part of a dog tag program, a dog walker must have available at all times documentation verifying a current rabies vaccination and the owner's contact information (name, home address, phone number, etc.).

- Dog walkers must keep dogs out of any area closed to dogs, including areas closed by fence, or closed by sign for restoration, habitat protection, safety or other reasons.
- Dog walking would not be allowed off-trail, in campgrounds, on designated swimming beaches, on informal (i.e., “social”) trails, in public buildings, or in any area not designated by the rule as open to dogs.
- Dogs would be allowed to enter the Crissy Field dog rinse station on a leash.
- Dog walkers must pick up their dogs’ feces immediately and dispose of them in a garbage container or remove them from the park. Bagged feces may not be left on the ground.
- In on-leash areas, the functional leash must be attached to the dog’s collar or harness and simultaneously held by the dog walker.
- Service animals accompanying a person with a disability, as defined by federal law and Department of Justice regulations (28 CFR § 36.104), are allowed wherever visitors or employees are allowed. Under the Federal Rehabilitation Act (FRA) – Section 504, service animals must be harnessed, leashed, or tethered, unless these devices interfere with the service animal’s work or the individual’s disability prevents use of these devices. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls. (U.S. Department of Justice 2010.) The NPS is currently revising its regulations to be clearer on the application of Department of Justice regulations covering the FRA (28 CFR 36) within a national park.
- Uncontrolled dogs are prohibited. Dogs are presumed not to be under control if they demonstrate behaviors that a reasonable person would find threatening, disturbing or aggressive such as:
 - Demonstrating uninvited or unwanted physical contact with another person;
 - Charging, chasing, attacking or otherwise displaying aggression toward any person, other dogs or other animals;
 - Intentionally or unintentionally annoying, charging, chasing, hunting, harassing, harming, wounding, attacking, capturing, or killing wildlife;
 - Entering areas closed to dogs;
 - Digging into soil, sandy dunes or vegetation, or destroying vegetation; or
 - Failing to be under voice and sight control in a VSCA.
- Dogs under four months old must be leashed, crated, or confined in a carrier at all times, including in VSCAs.
- Dogs in heat are not allowed in the park.
- Dogs are not allowed to breed in the park.
- Dog walkers may not let their dogs off leash on paths or in parking lots adjacent to VSCAs. Leashes may only be removed once inside a VSCA.

ADDITIONAL REQUIREMENTS FOR VOICE AND SIGHT CONTROL AREAS

- Dog walkers may walk dogs off leash only within designated VSCAs.
- Each off-leash dog must be under voice and sight control at all times. A dog is under voice and sight control if the dog is within direct eyesight of the dog walker and the dog walker is able to

both immediately recall the dog directly to the dog walker's side and attach the lease to the dog, regardless of circumstances or distractions. Dog walkers must be able to demonstrate this ability when requested to do so by a person authorized to enforce the dog walking rule.

- All dog walkers in VSCAs must have a functional leash of no more than 6 feet in length for each dog under the dog walker's care that can be attached immediately to the dog's collar or harness.
- VSCAs, or parts thereof, may be periodically closed to allow re-growth of vegetation on an as-needed basis.

REFERENCES

U.S. Department of Justice

- 2010 *Service Animals*. ADA 2010 Revised Requirements. Civil Rights Division, Disability Rights Section. 25 September. Available online: http://www.ada.gov/service_animals_2010.pdf. Accessed January 7, 2012.

APPENDIX F: SPECIAL USE PERMIT

SPECIAL USE PERMIT CONDITIONS

Under alternatives C, E, and F (the preferred alternative), Special Use Permits (SUPs) would be available to both commercial and private dog walkers to walk more than three dogs at one time; the maximum number of dogs allowed at one time would be six. Permits would be issued only for the following seven sites: Alta Trail; Rodeo Beach; Marin Headlands (alternative F only); Fort Baker; Fort Mason; Crissy Field; Baker Beach; and Fort Funston. Alternatives B and D do not have a SUP provision because no more than three dogs per dog walker are allowed in those two alternatives.

1) Permit Terms and Conditions Based on Preferred Alternative

The following terms and conditions are examples of the terms and conditions that would be included in SUPs issued for the walking of four to six dogs if alternative F is selected for implementation. The National Park Service (NPS) reserves the right to change permit terms and conditions in the future. The NPS also reserves the right to develop different permits for commercial dog walkers than for private dog walkers.

- Permits will allow dog walking of four to six dogs on designated trails or sites in the following Golden Gate National Recreation Area locations only: Alta Trail to intersection with Orchard Trail; Rodeo Beach; Fort Baker, excluding Drown Fire Road; Fort Mason; Crissy Field; Baker Beach; and Fort Funston. The specific boundaries of the areas that are open to permitted dog walking will be described in the rule. The NPS also will prepare separate maps illustrating these areas to assist park users in understanding the areas open to dog walking.
- Dog walkers may not enter the park with more than six dogs at one time. Dog walkers entering the park with four or more dogs may not circumvent the permit requirement by walking fewer than four dogs at one time.
- Permits are not transferrable.
- Permitted dog walking is not authorized in picnic areas or in any other area not specifically open to permitted dog walking.
- Permit Time limits: Dog walking between four and six dogs will be limited to the hours of 8 a.m. to 5 p.m. Monday through Friday in areas designated for this use by the rule.
- Initially, all permits will be valid until the end of January following the calendar year in which the permit was issued.
- All permit holders must abide by applicable NPS regulations and permit conditions, including a statement that the permit holder accepts liability for any accident/incident/injury resulting from the permitted use. An applicant's signature will serve as confirmation that the applicant has read and accepted all permit terms and conditions.
- All permits will require proof of liability insurance. Insurance requirements for commercial dog walkers are \$2 million aggregate/\$1 million per occurrence. For private dog walkers, commercially reasonable liability insurance limits will be established by NPS and included in the permit. Insurance is available through homeowner's or renter's insurance policies. Proof of insurance must be returned with the permit application before the permit application will be considered.

- All permits will require proof of approved dog-handling training through existing regionally or nationally-accredited training courses offered by organizations (e.g., Marin Humane Society, San Francisco Society for the Prevention of Cruelty to Animals (SPCA), American Kennel Club) approved by the local county jurisdiction in which the activity will occur, and as accepted by the superintendent. A list of such courses can be obtained through the local county jurisdiction for that county in which the NPS dog walking permit is being requested. A list of courses accepted by the superintendent will be posted on the park's website. Proof of training must be returned with the permit application.
- All county licensing requirements for dogs for the county in which the dog's owner resides must be valid and current, with owner's name, home address, and telephone available from the dog guardian or walker. All dogs brought into the park must have current rabies vaccinations, and proof of such. Documentation of these can be in the form of dog tags if the county of owner's residence issues such tags.

2) Costs

- The NPS intends to recover the costs of administering the SUP program under 54 USC 103104. To obtain a SUP to walk more than three dogs at one time, the proposed rule would require dog walkers to obtain an NPS permit and pay a permit fee to allow the NPS to recover these costs.
- Once a permit is issued no refunds are allowed.

3) Permit Identification Design

- Initial permit identification design will be an easily identifiable plastic card, with photograph and the permit holder's name, and the month/year of issuance or identification number. (Personal identifying information will not be visible on outer surface of card if the card is required to be displayed.) Over the life of the plan, the permit identification design or method of identifying permit holders in the field may be changed. For instance, the NPS may require that permit holders rent and wear identifying vests similar to those used by Marin County Open Space and Parks.
- Permitted dog walkers must display the NPS-issued permit identification at all times when the permittee is walking four to six dogs in areas open to such use.
- Commercial permits may require additional identifying elements.

4) Monitoring Based Management Program

- Initially, there will be no limit on the number of permits issued for the walking of four to six dogs. However, the impacts of dog walking, including permitted dog walking, will be monitored through the monitoring-based management program. If monitoring results indicate that impacts are approaching unacceptable conditions, the NPS would take management action to ensure compliance and protect resources. Please see appendix E and chapter 2 for additional information.

5) Enforcement/Revocation

- Any failure by a permittee to comply with applicable laws of the United States of America and/or NPS regulations or with any of the terms and conditions of a permit may result in the immediate probation, suspension or revocation of the permit as determined in the sole discretion of the Superintendent, or his or her designee.
- NPS retains the right to permanently revoke a permit.

Appendix G: Law Enforcement Data

This appendix contains LE data used in the SEIS, covering years 2001-2011. Park incident data added to this FEIS for years 2012 - 2016 is presented entirely within the FEIS text. This is because NPS changed its reporting software and inputting system in 2012, and data were not collected or categorized in a similar manner as previous years, including dog related incidents, which were not recorded separately, but captured under “Other Offenses.”

Analysis of Law Enforcement Data within Golden Gate National Recreation Area

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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.

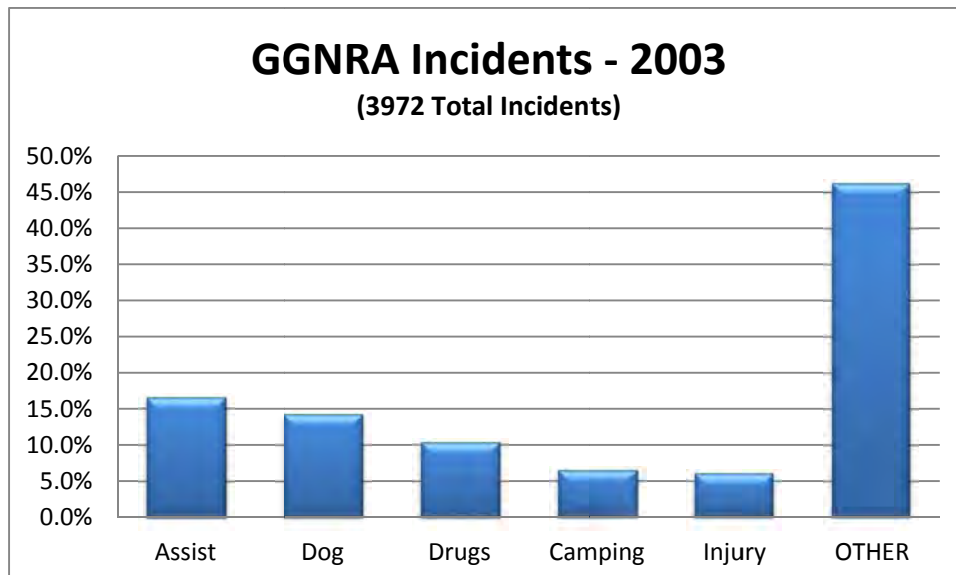
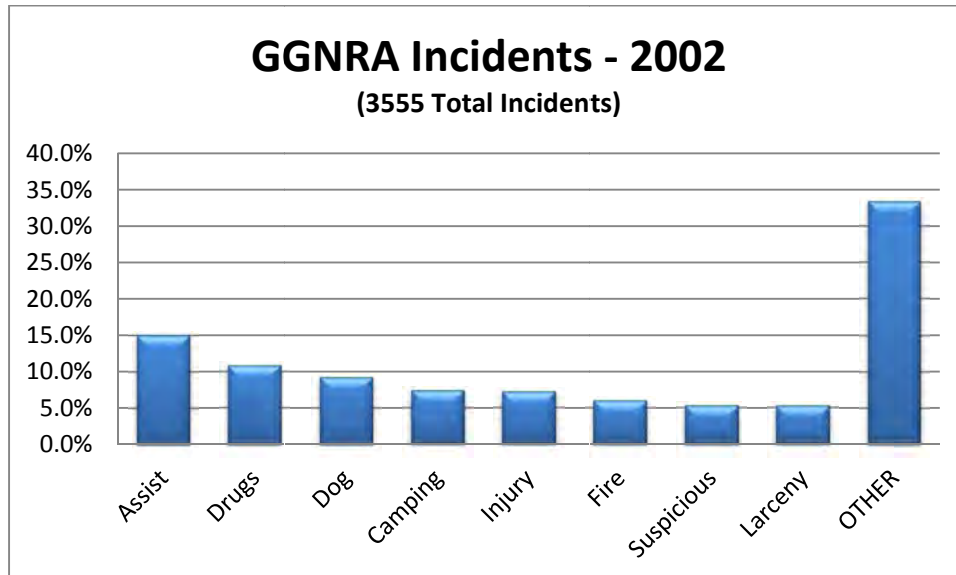
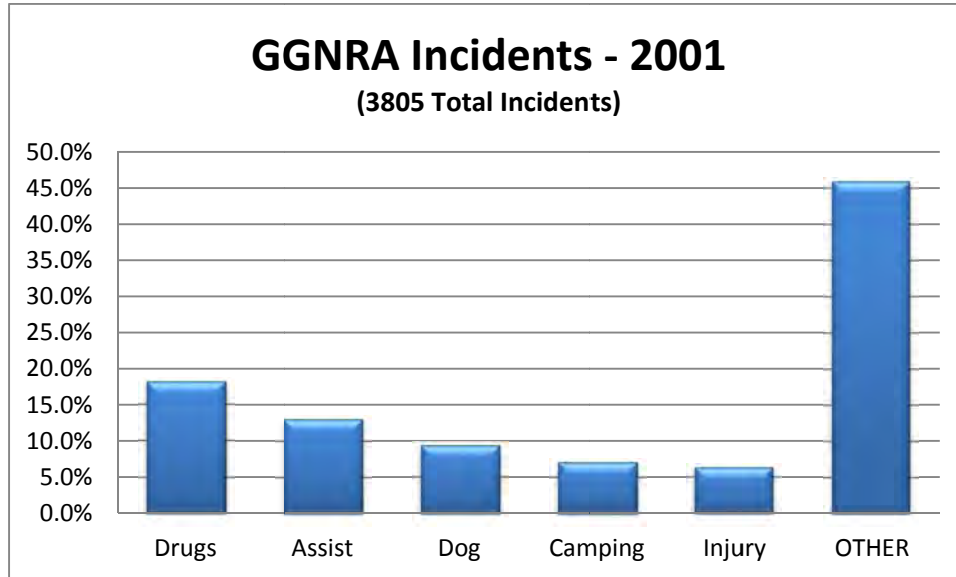
For the "ALL Areas Together" tab, data were sorted by "Violation/CFR Cite" then by "Action Taken." The total number of each type of "Violation/CFR Cite" was determined. The number of each "Action Taken" for each of the above "Violation/CFR Cite" was determined. Graphs were created showing CFR Violations 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.

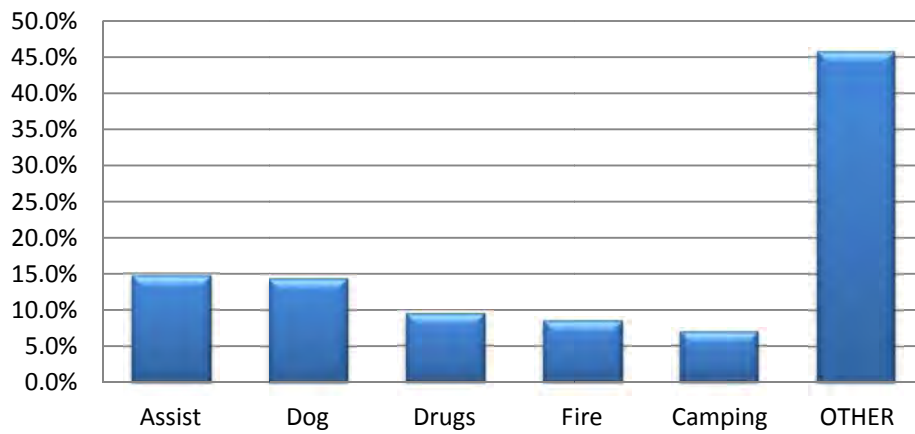
Attachment A: Graphs of LE Data Analysis for All Incidents

A1: All of GGNRA



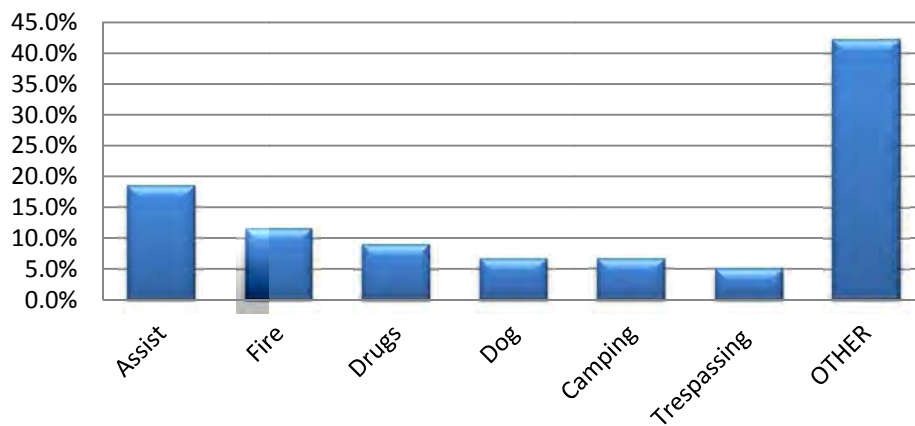
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(4769 Total Incidents)



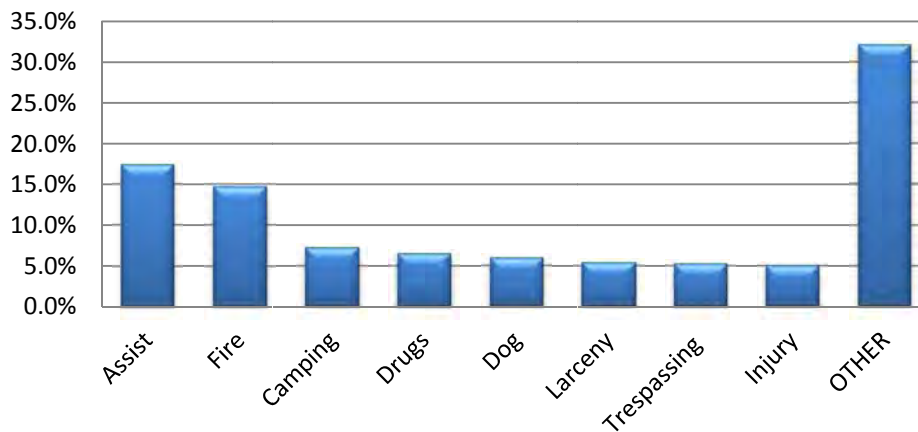
GGNRA Incidents - 2005

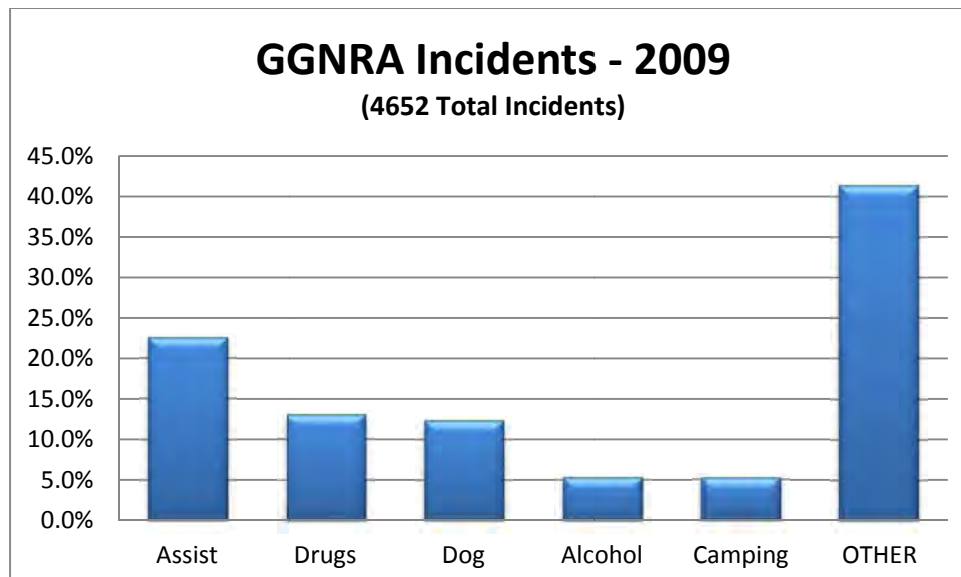
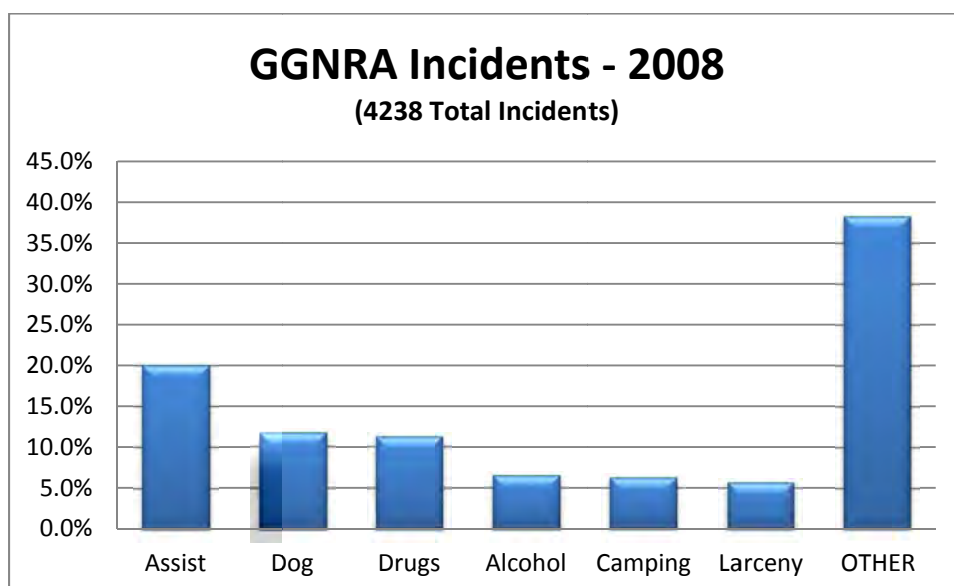
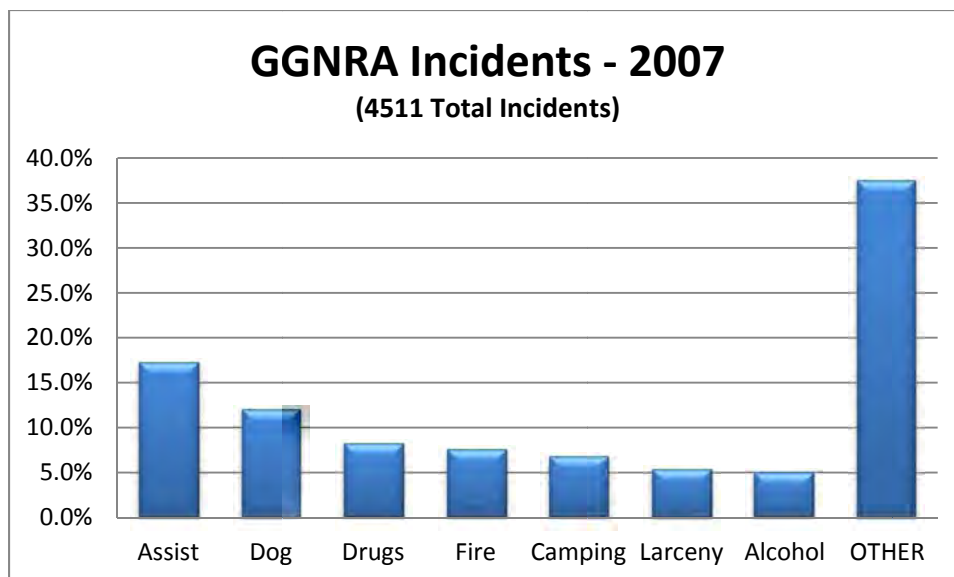
(4366 Total Incidents)



GGNRA Incidents - 2006

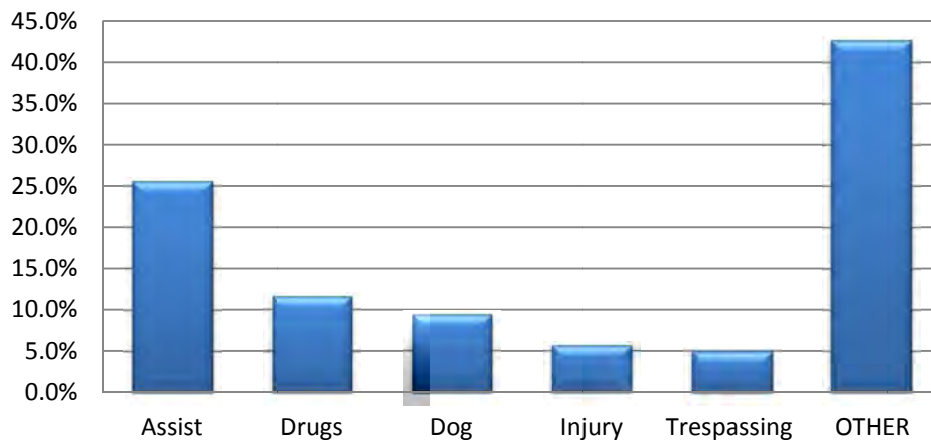
(3943 Total Incidents)





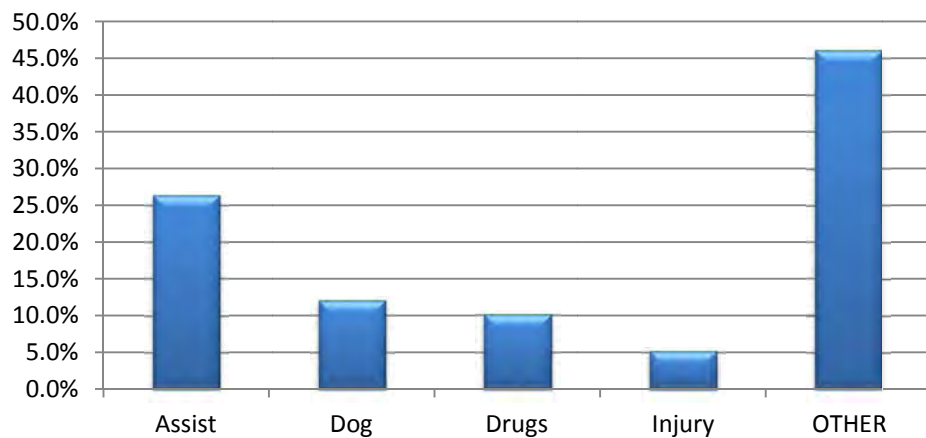
GGNRA Incidents - 2010

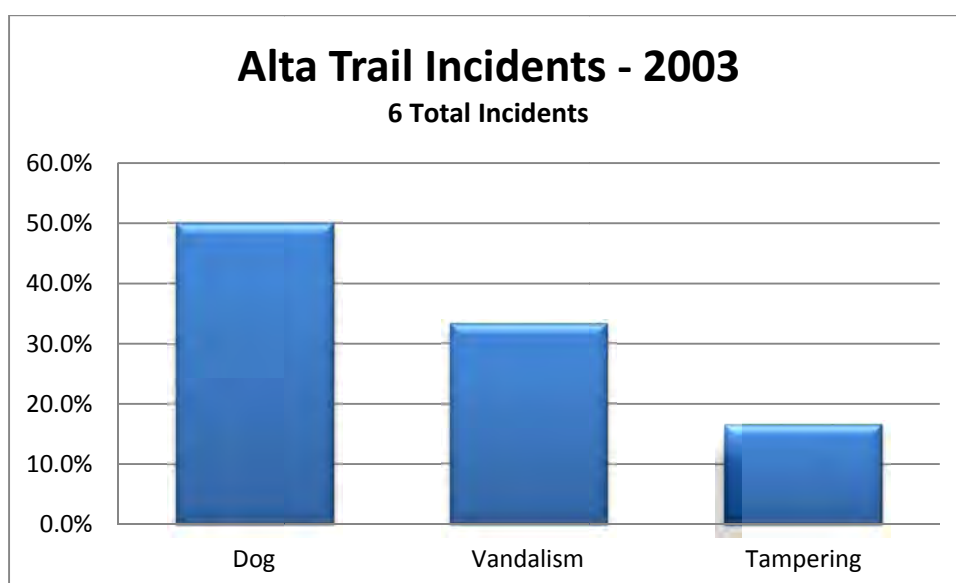
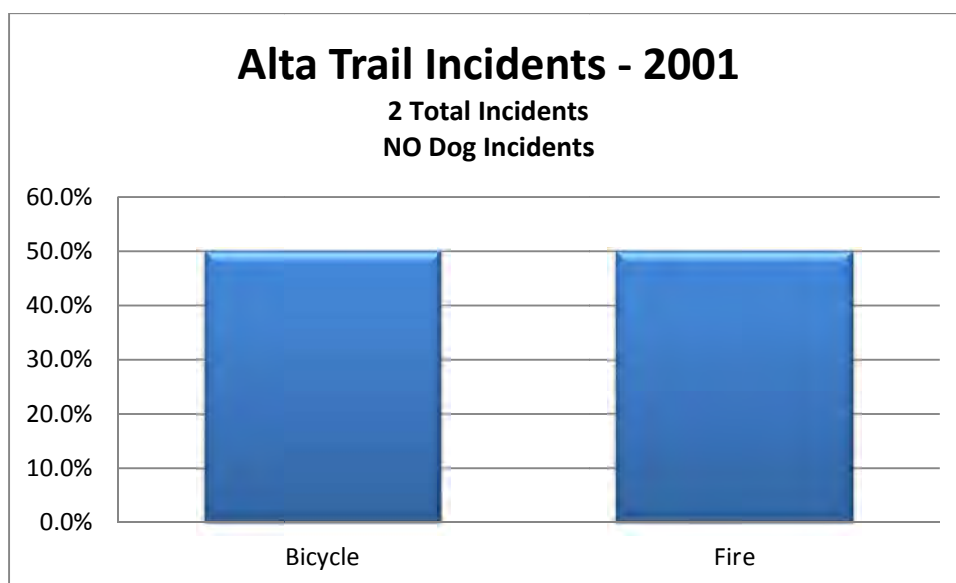
(4012 Total Incidents)

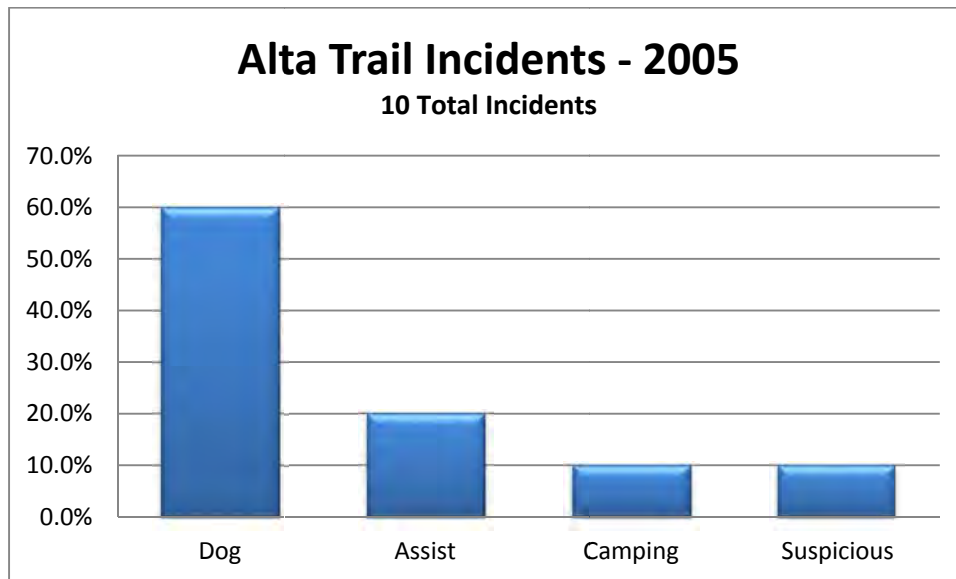
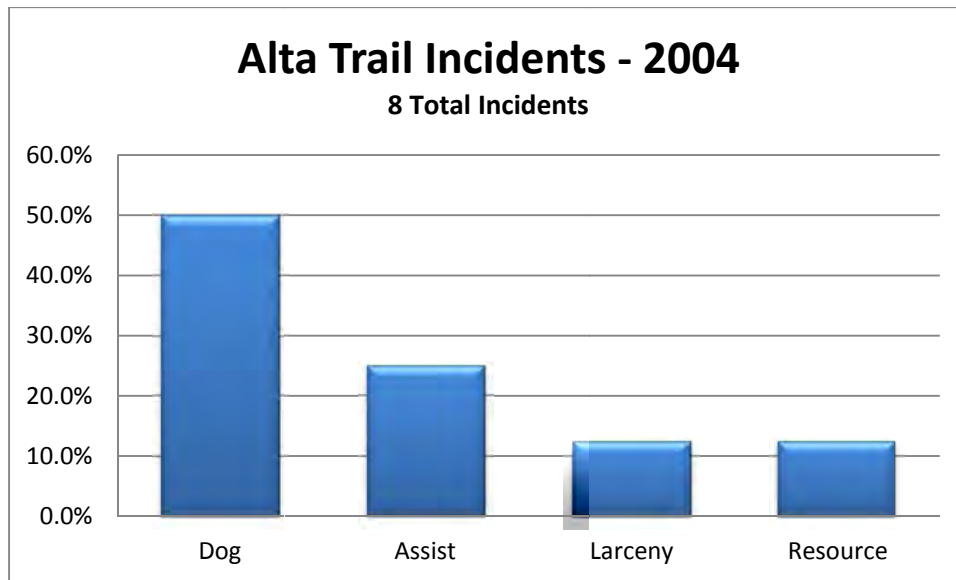


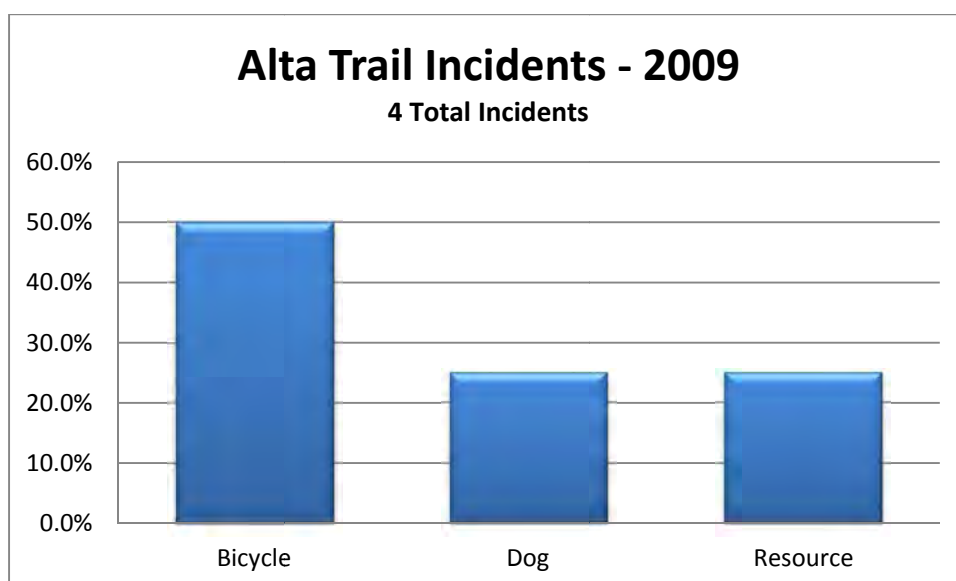
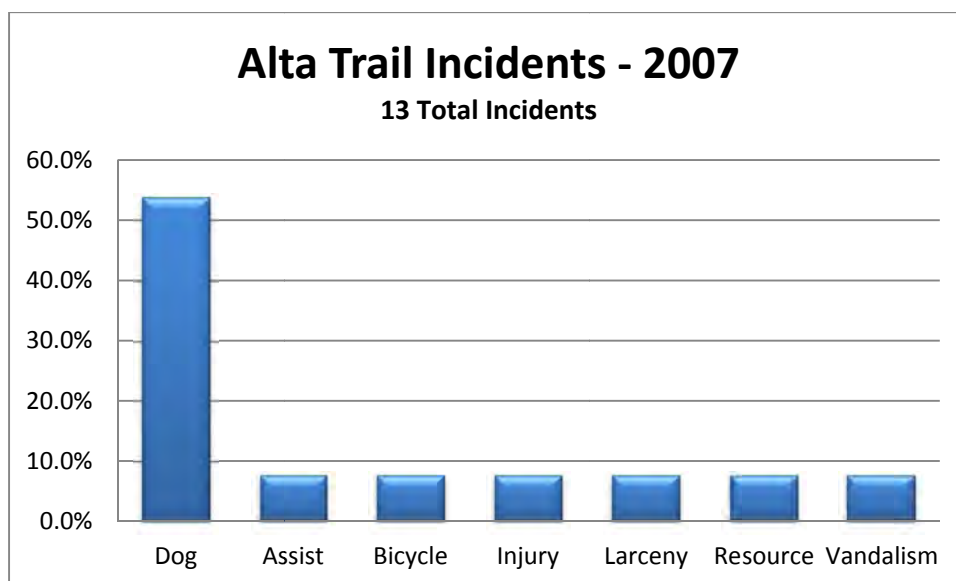
GGNRA Incidents - 2011

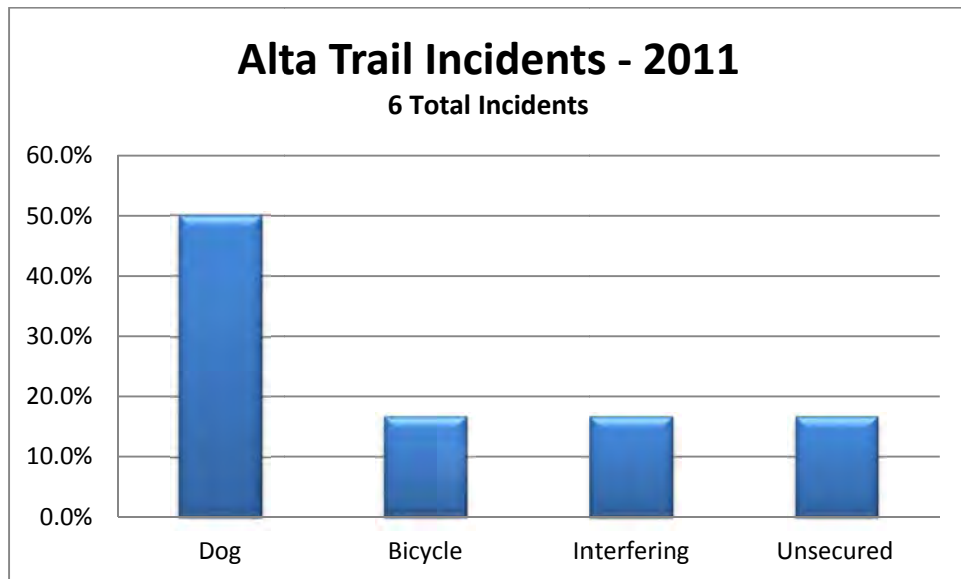
(3877 Total Incidents)





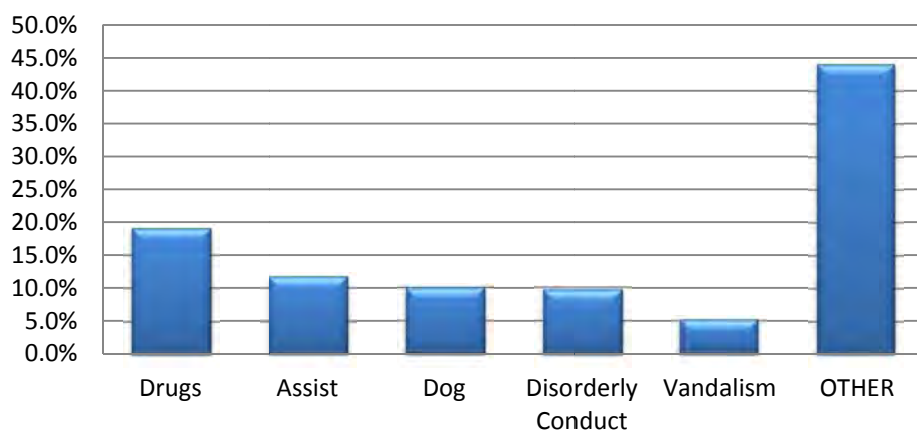






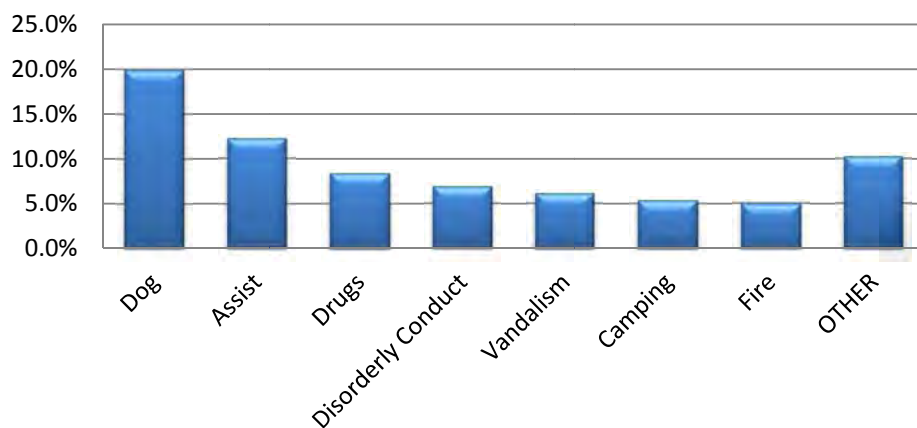
Baker Beach Incidents - 2001

288 Total Incidents



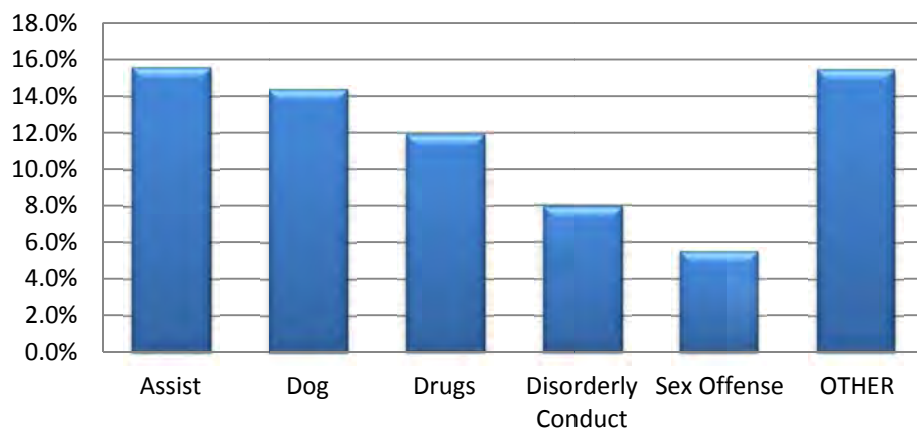
Baker Beach Incidents - 2002

261 Total Incidents



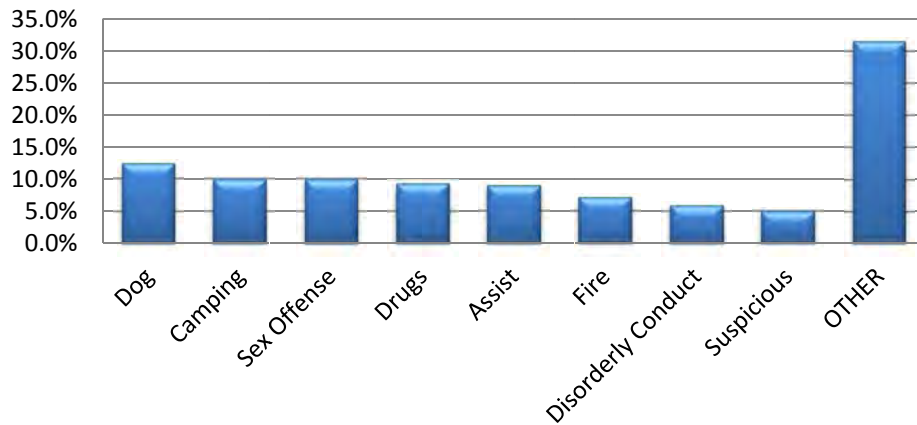
Baker Beach Incidents - 2003

327 Total Incidents



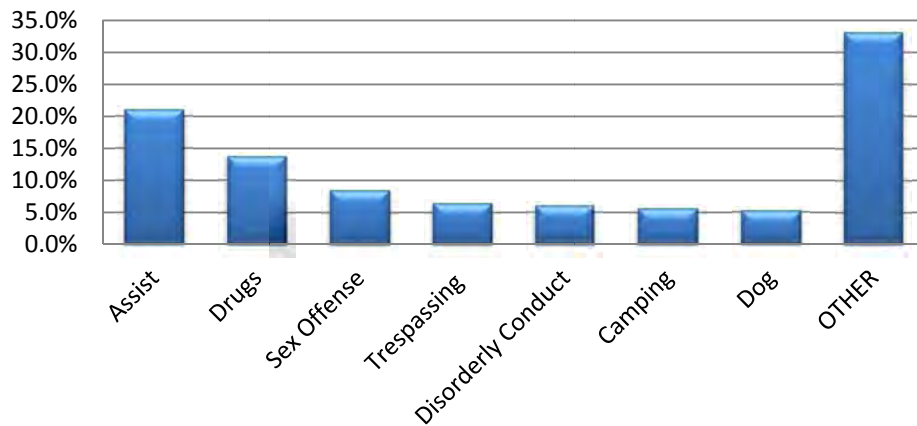
Baker Beach Incidents - 2004

323 Total Incidents



Baker Beach Incidents - 2005

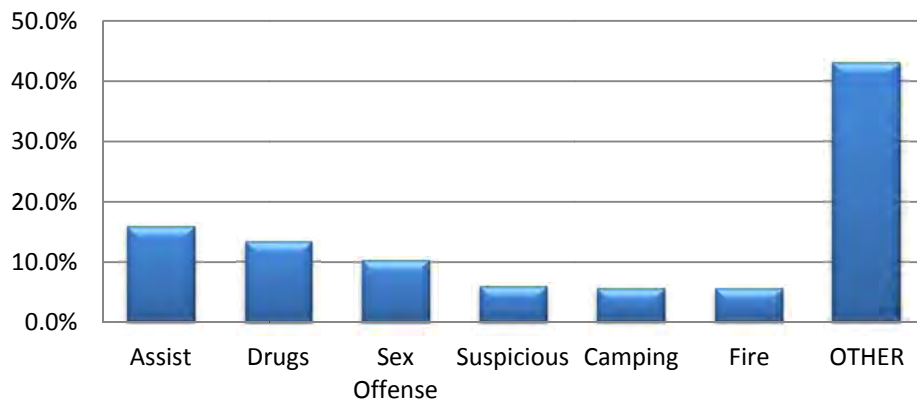
247 Total Incidents



Baker Beach Incidents - 2006

232 Total Incidents

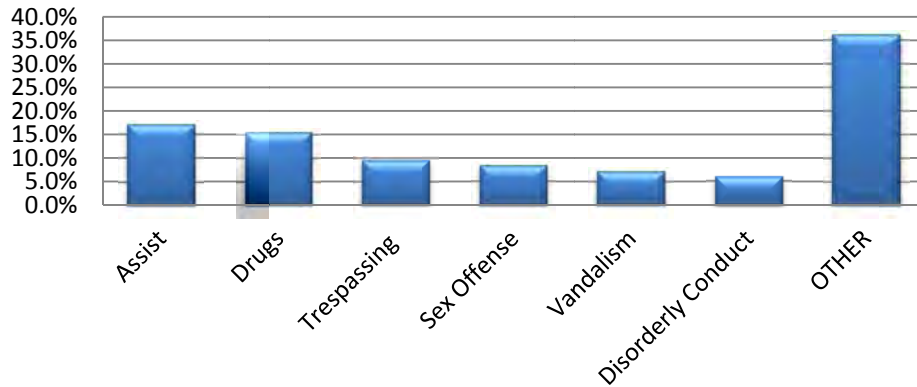
Dog Incidents Included in "Other" = 4.7%



Baker Beach Incidents - 2007

251 Total Incidents

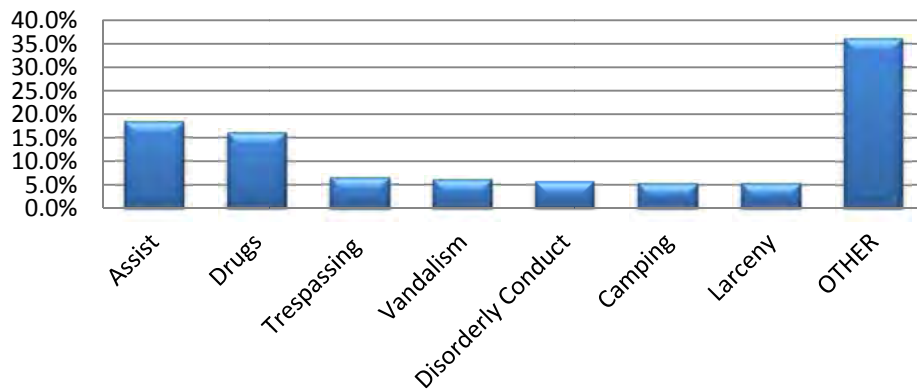
Dog Incidents Included in "Other" = 1.2%



Baker Beach Incidents - 2008

260 Total Incidents

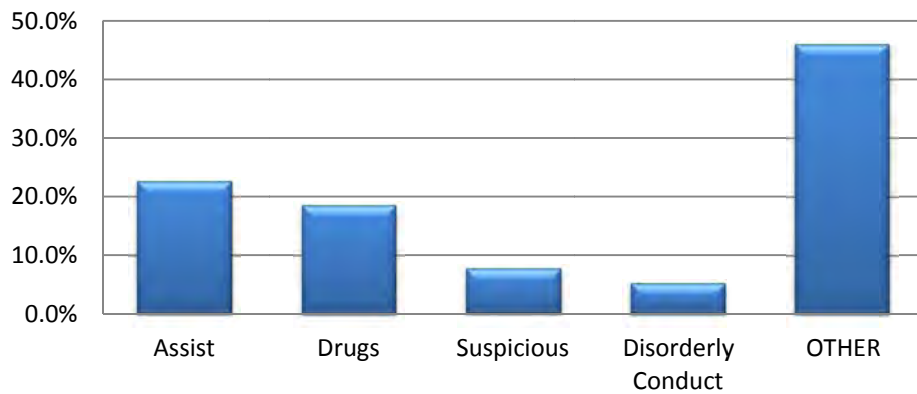
Dog Incidents Included in "Other" = 3.1%



Baker Beach Incidents - 2009

287 Total Incidents

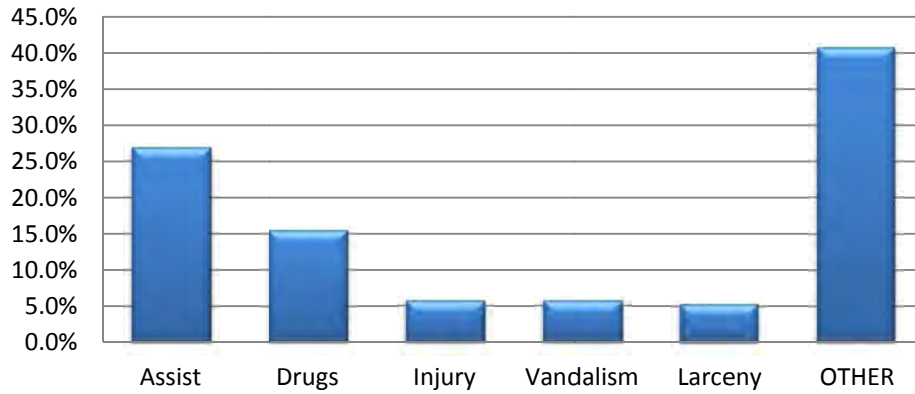
Dog Incidents Included in "Other" = 2.8%



Baker Beach Incidents - 2010

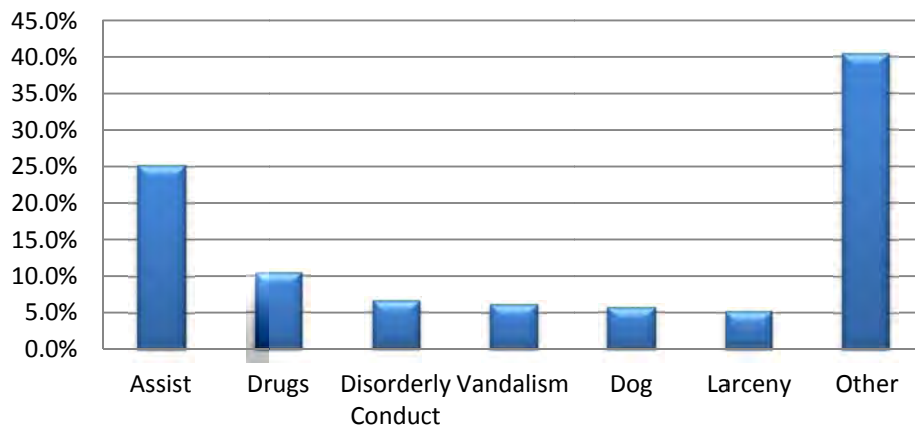
245 Total Incidents

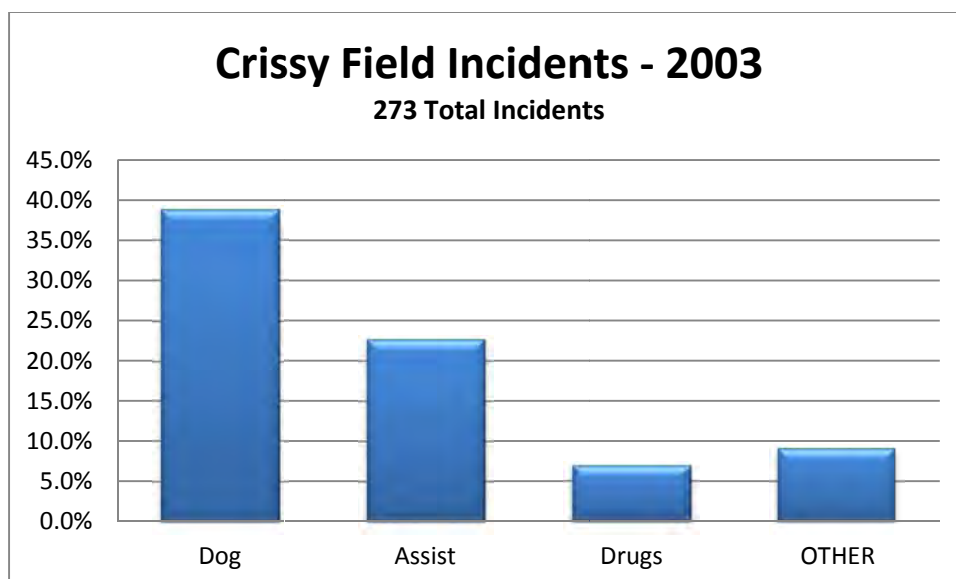
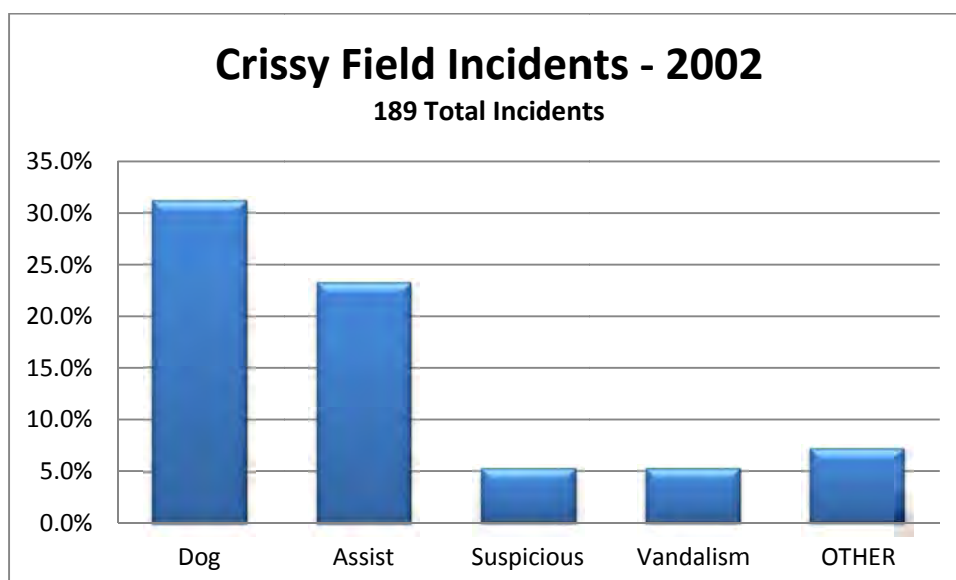
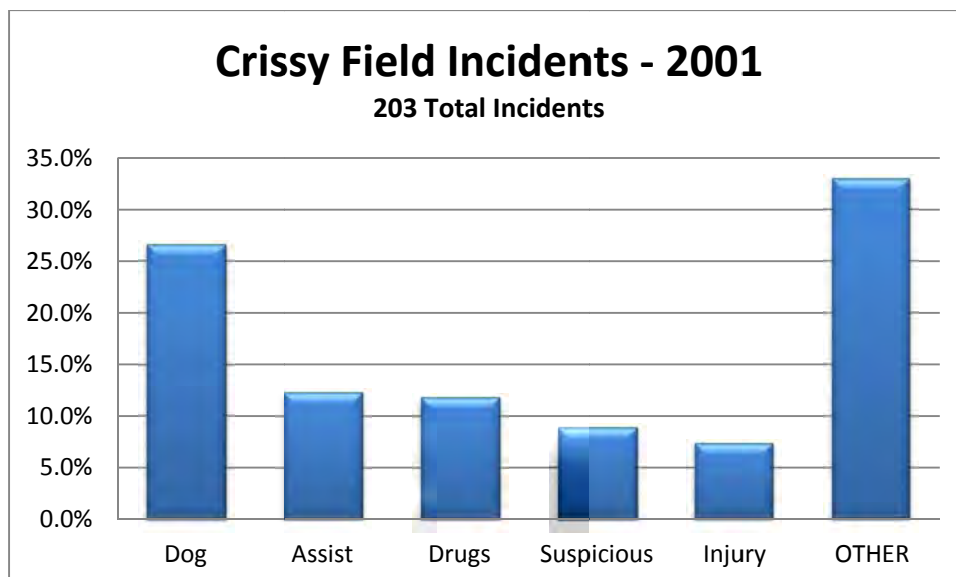
Dog Incidents Included in "Other" = 4.1%



Baker Beach Incidents - 2011

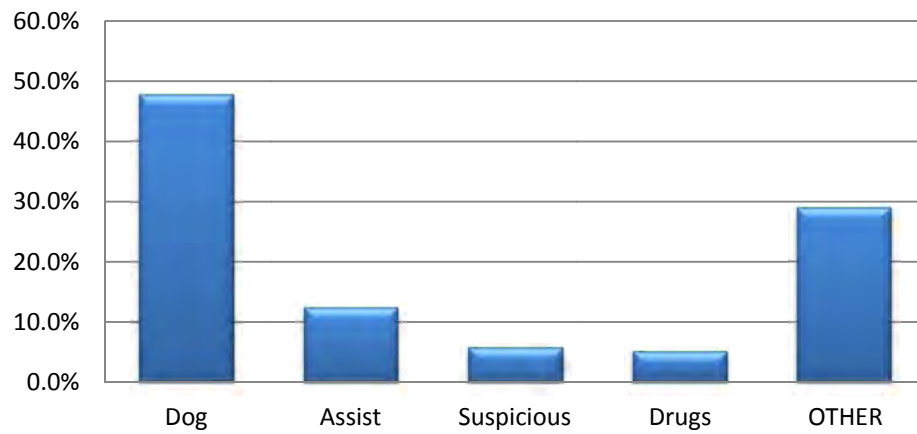
210 Total Incidents





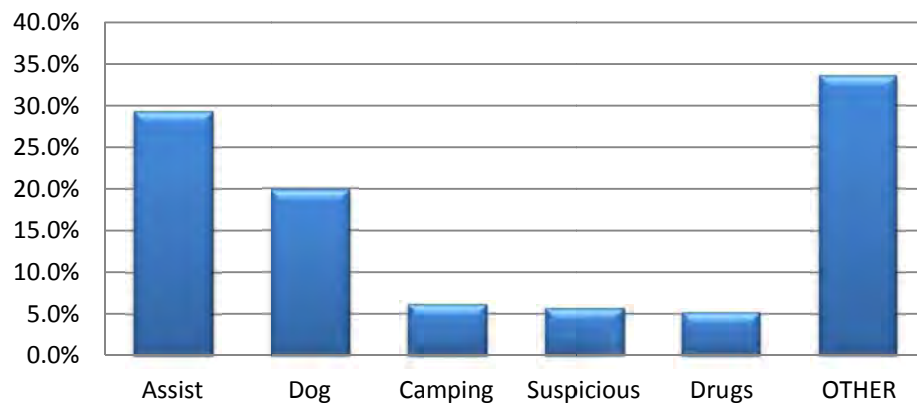
Crissy Field Incidents - 2004

314 Total Incidents



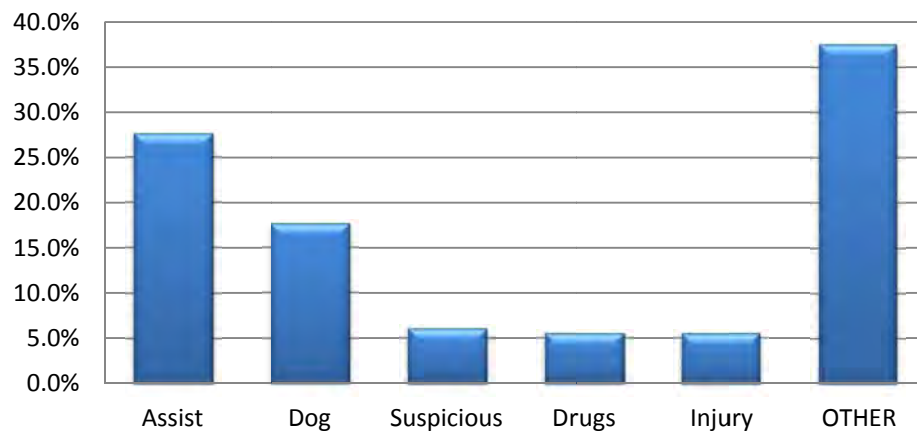
Crissy Field Incidents - 2005

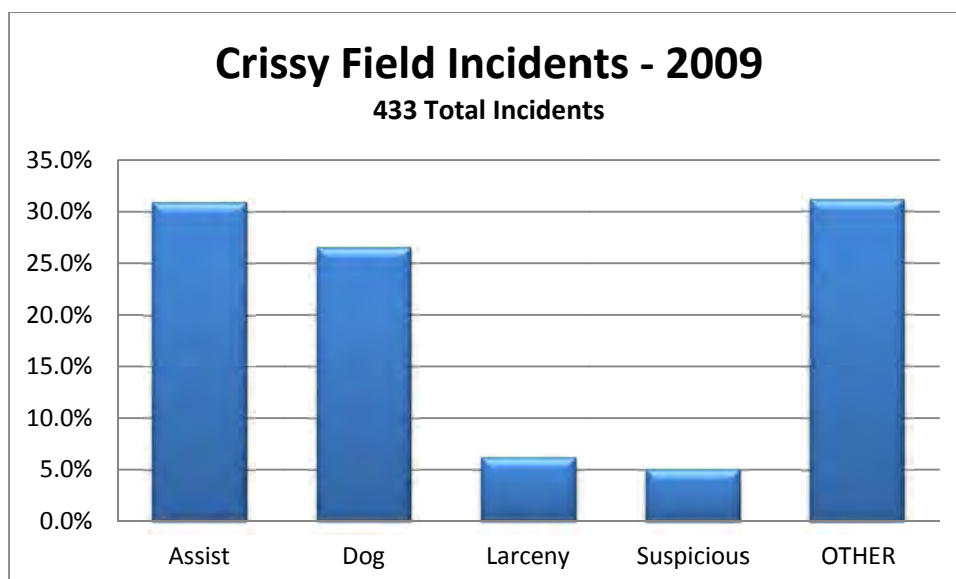
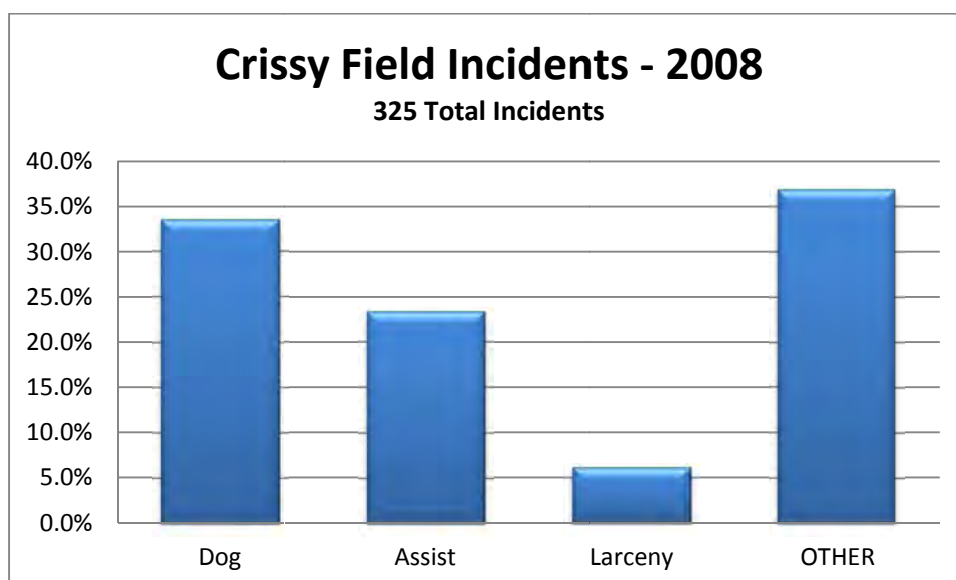
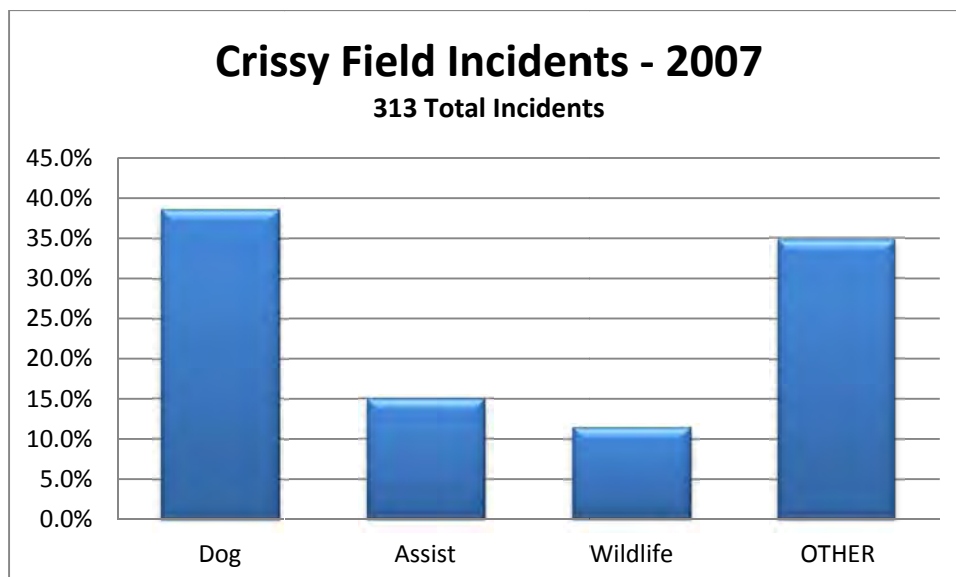
211 Total Incidents



Crissy Field Incidents - 2006

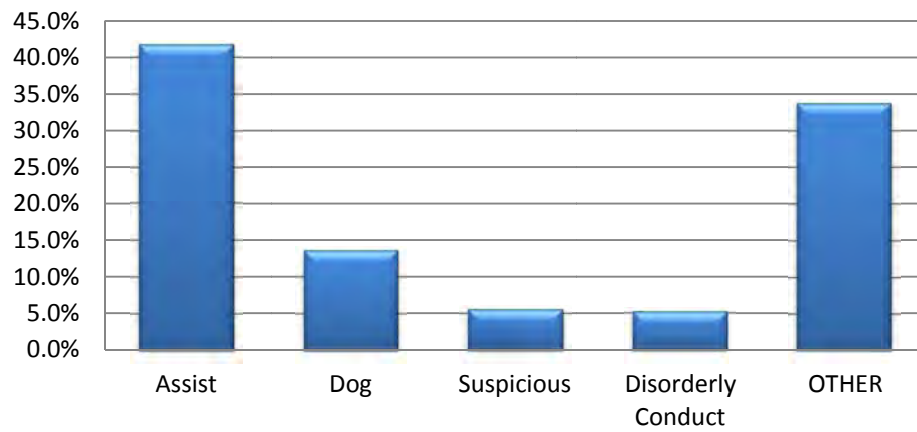
181 Total Incidents





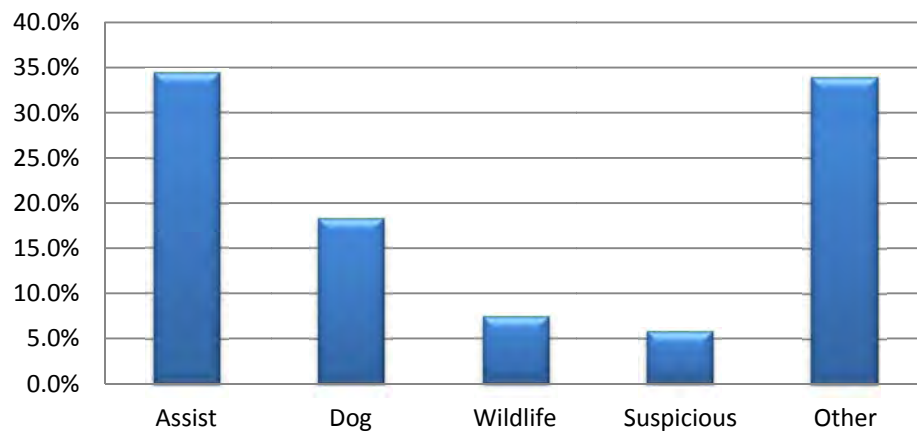
Crissy Field Incidents - 2010

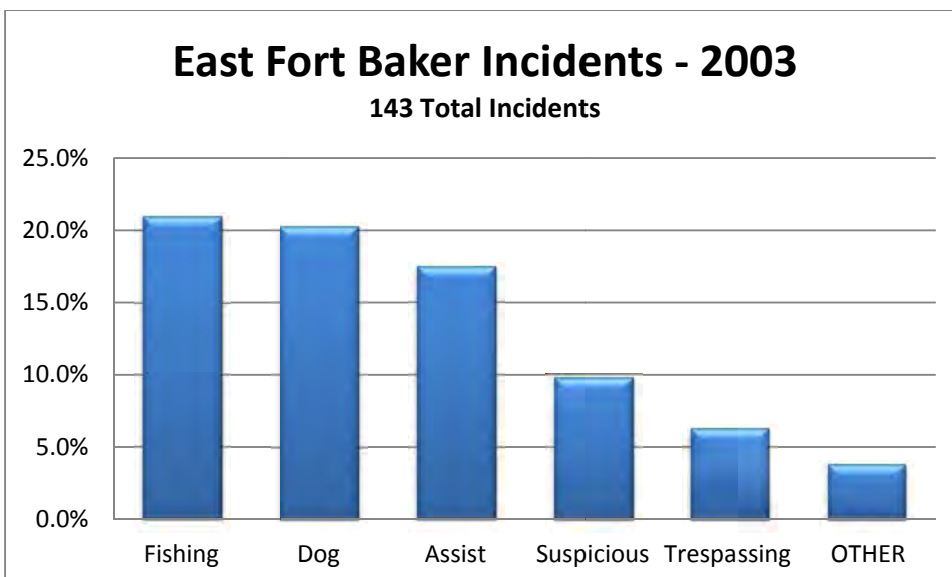
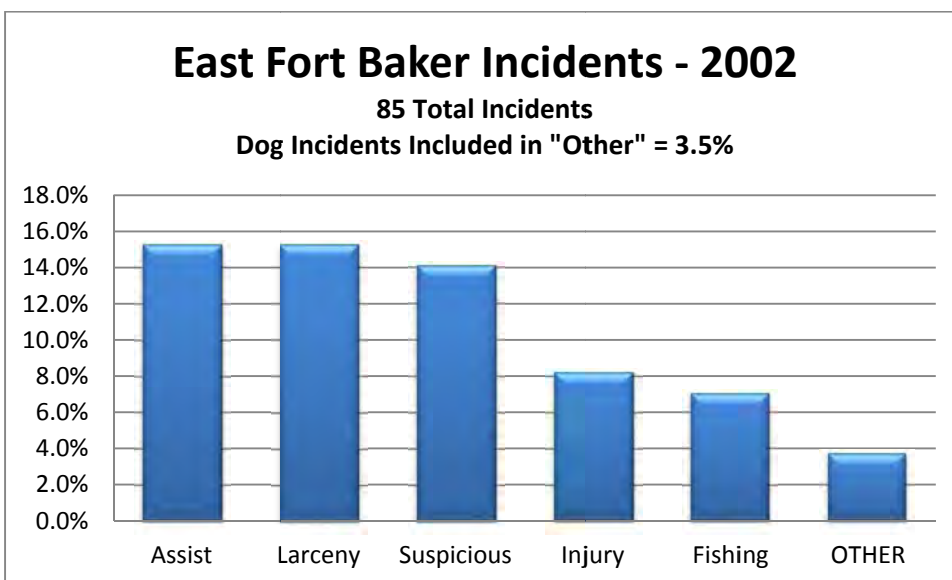
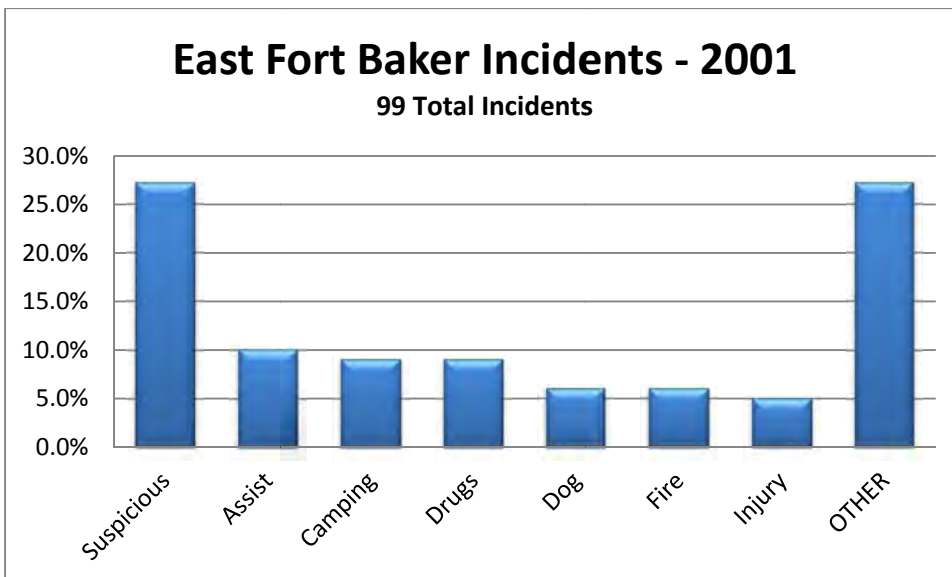
287 Total Incidents

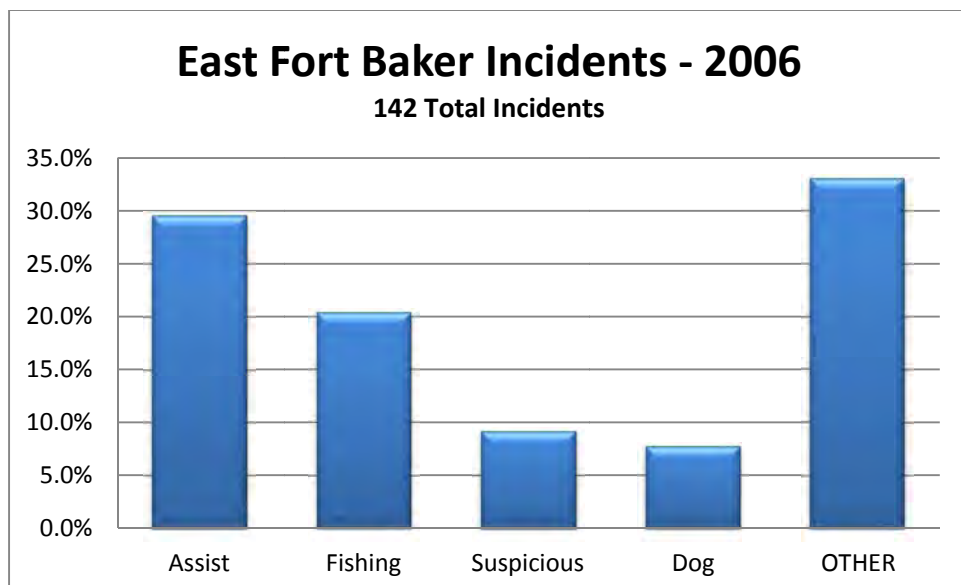
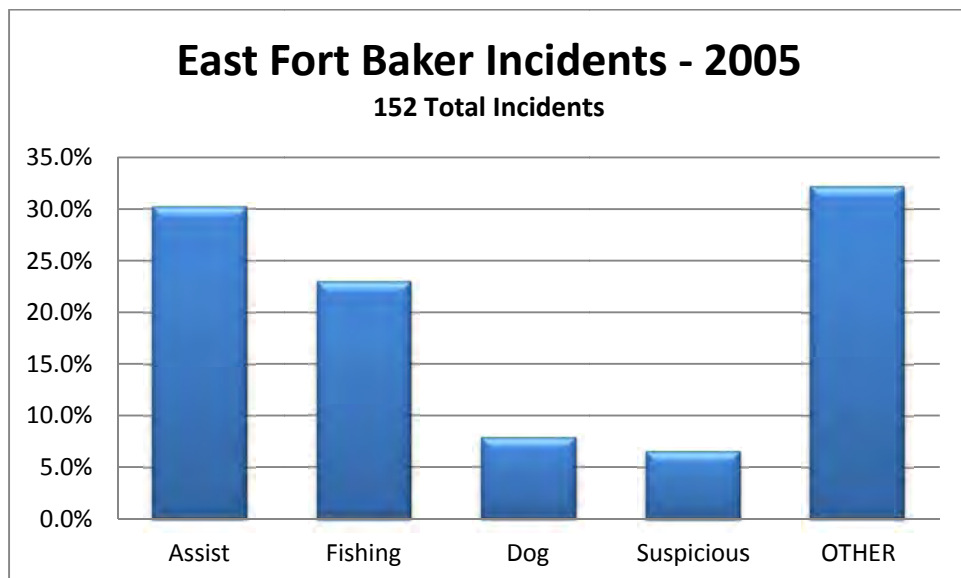
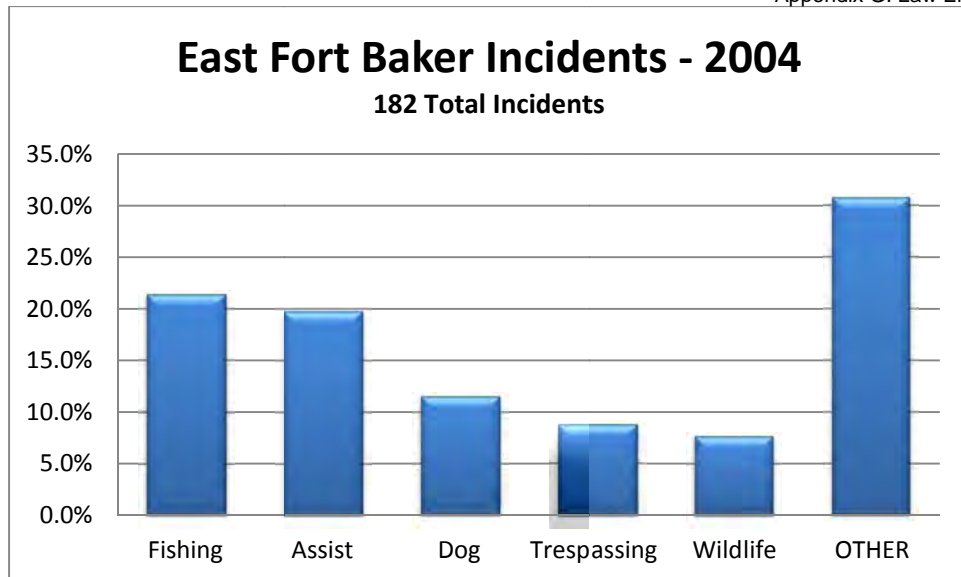


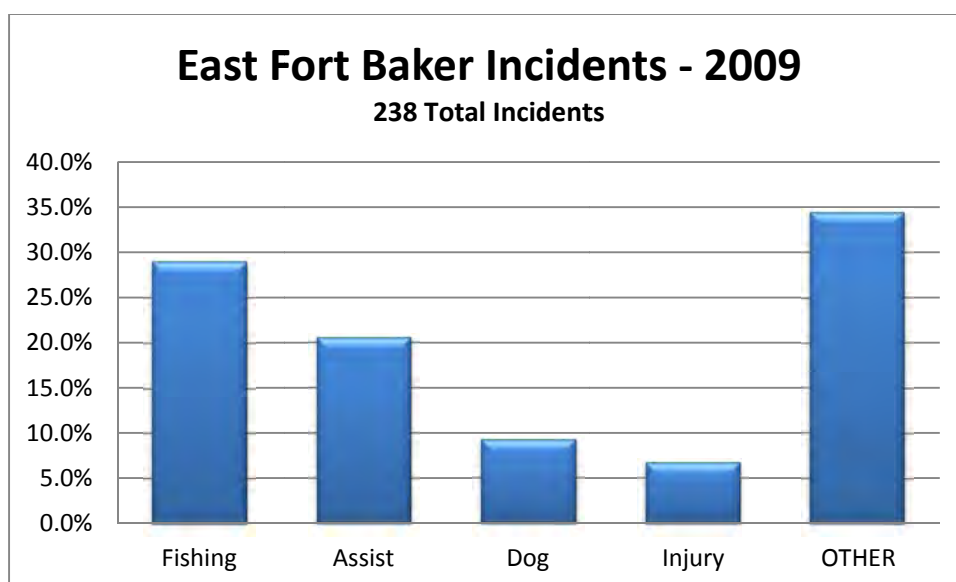
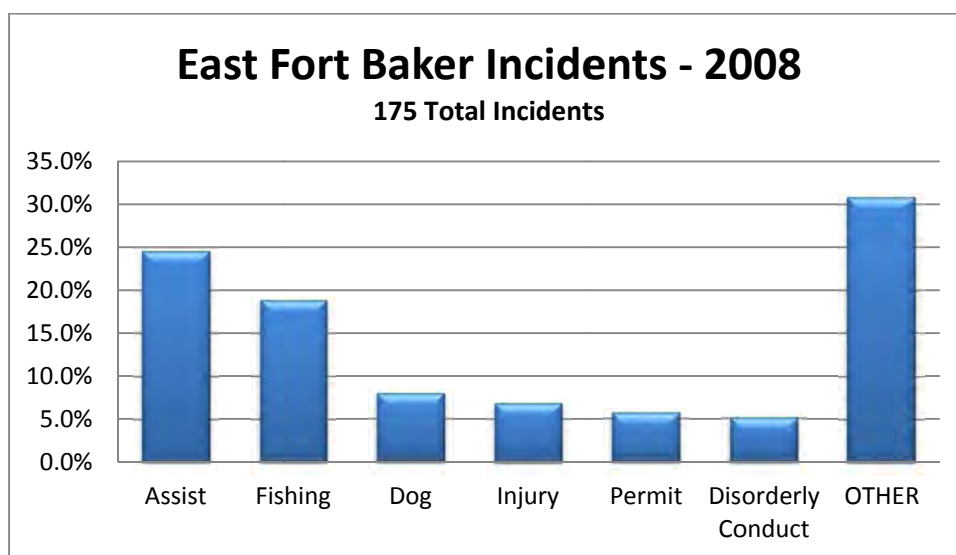
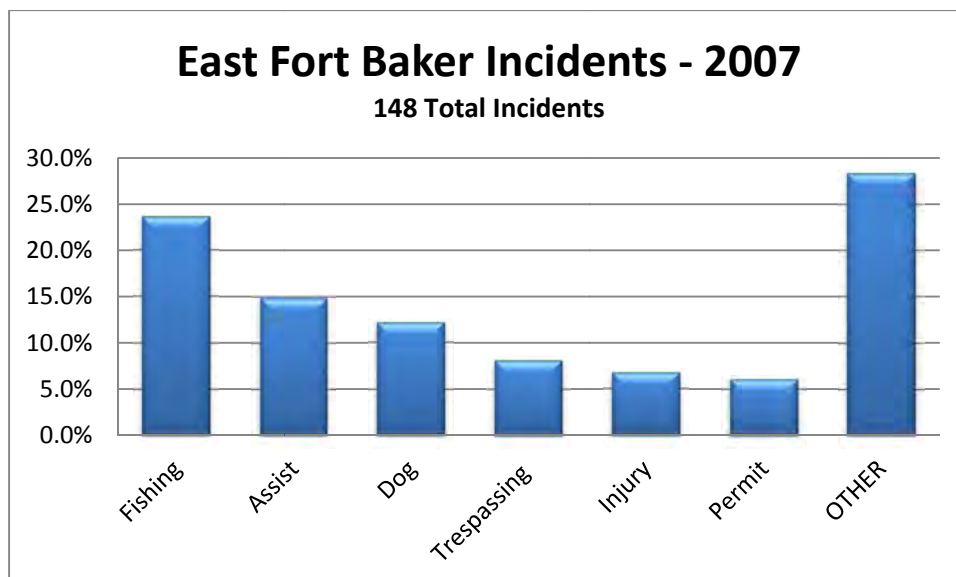
Crissy Field Incidents - 2011

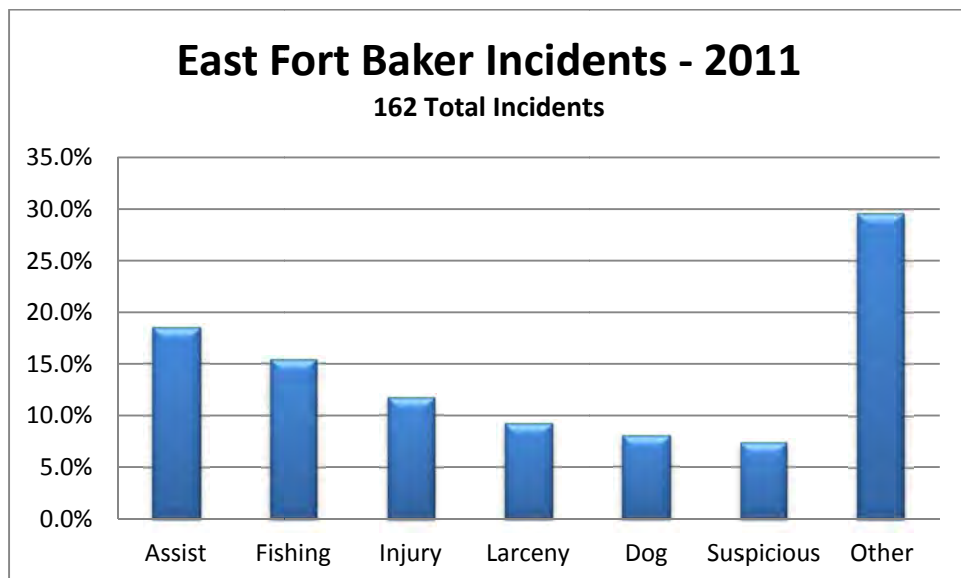
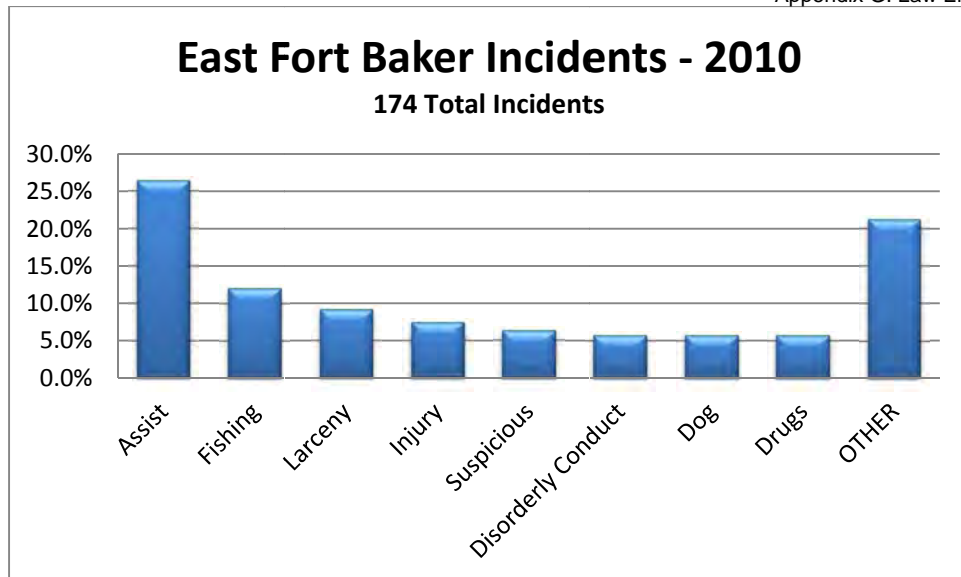
377 Total Incidents

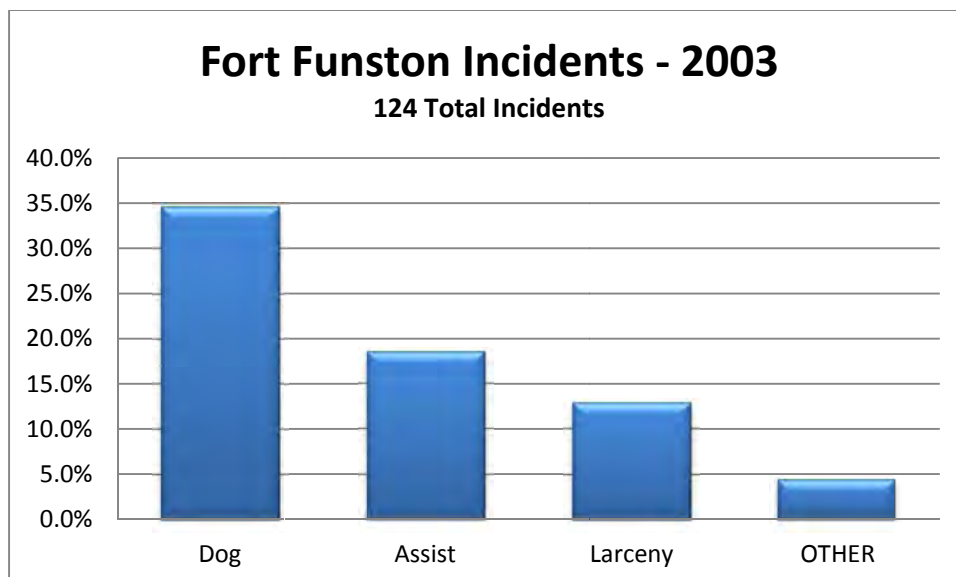
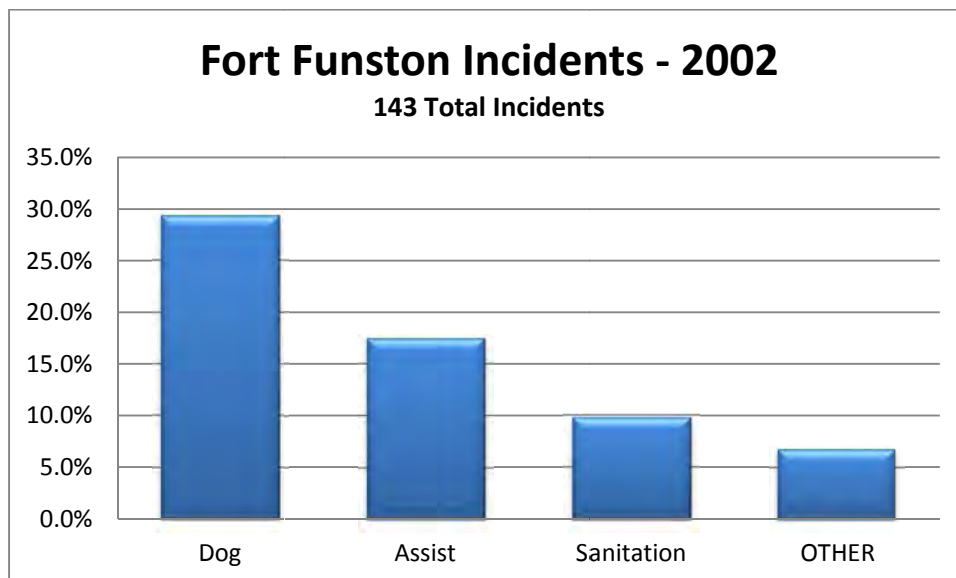
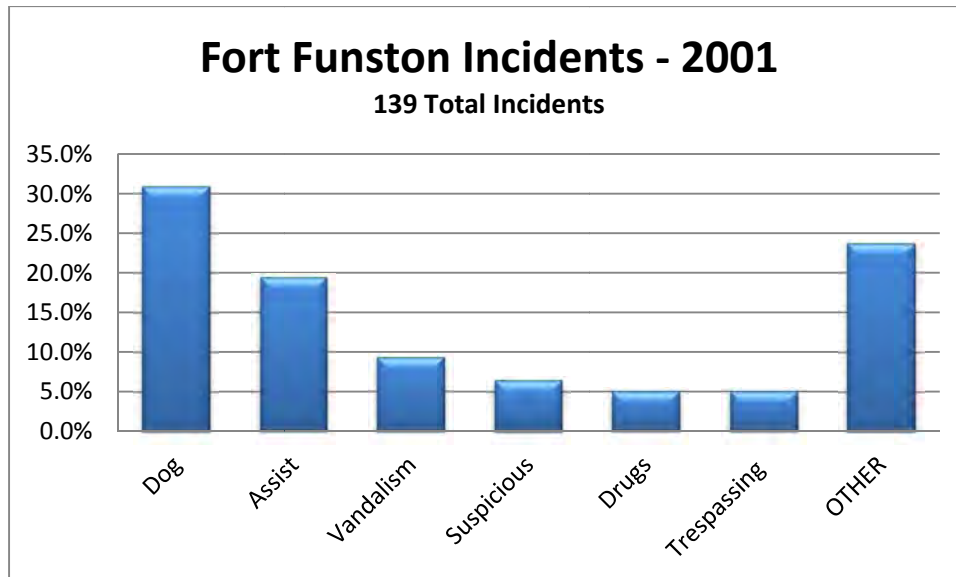






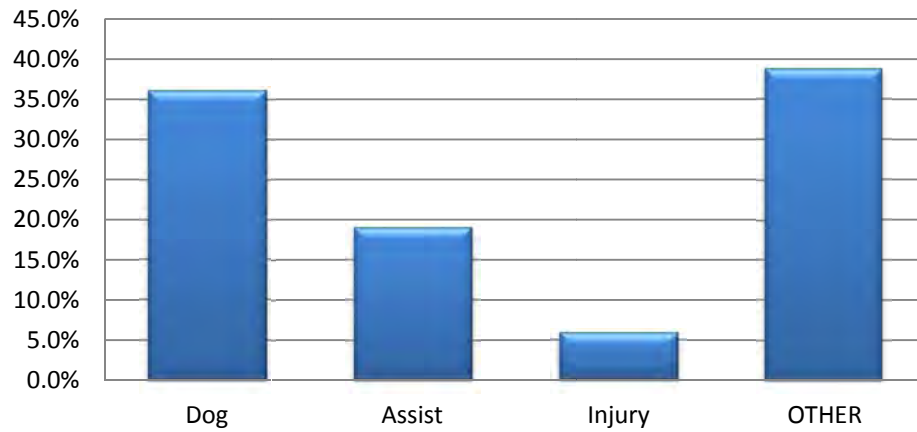






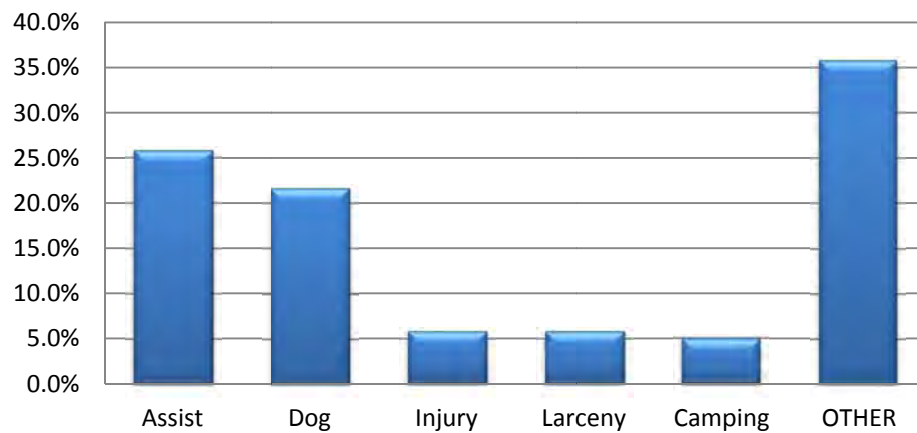
Fort Funston Incidents - 2004

152 Total Incidents



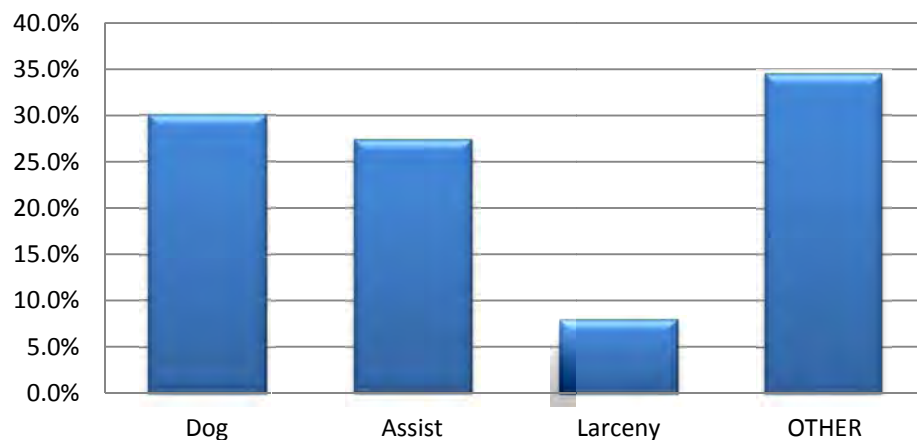
Fort Funston Incidents - 2005

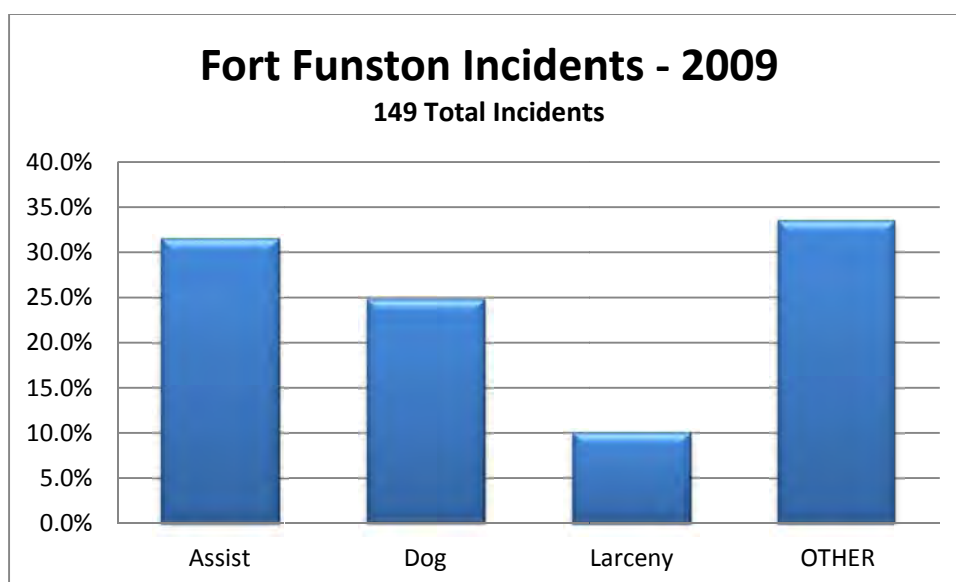
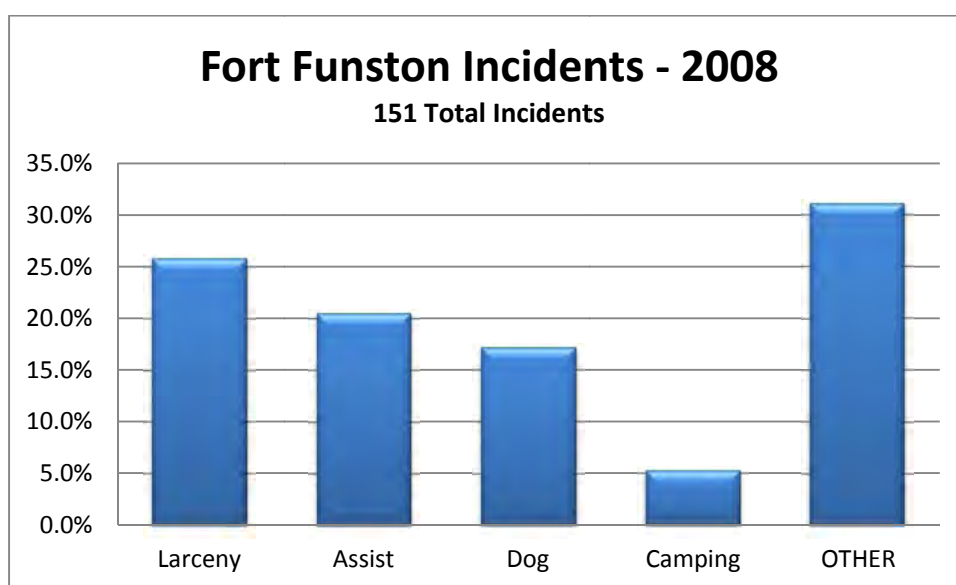
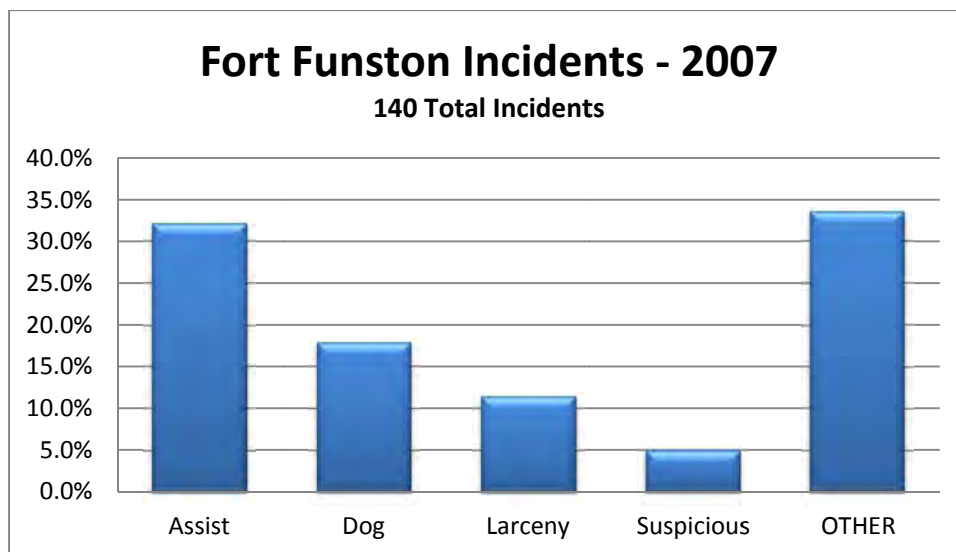
120 Total Incidents



Fort Funston Incidents - 2006

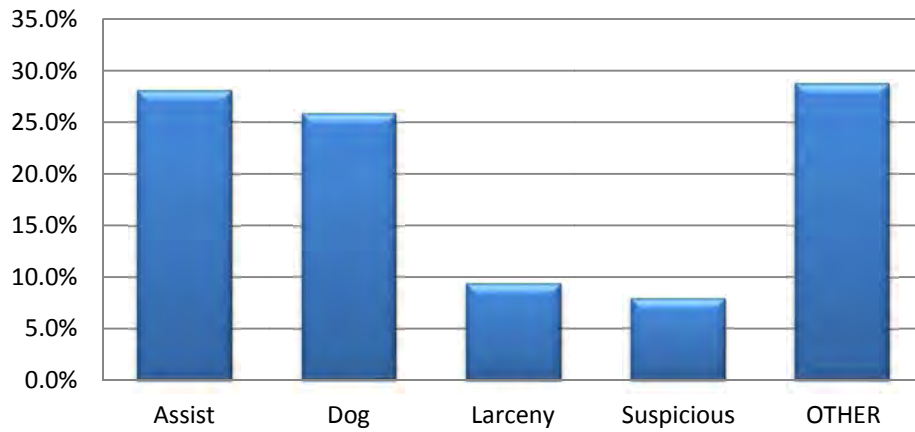
113 Total Incidents





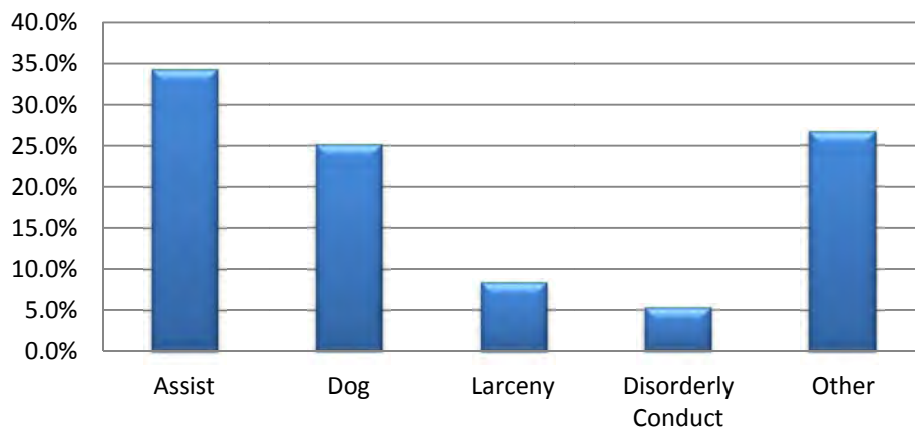
Fort Funston Incidents - 2010

139 Total Incidents



Fort Funston Incidents - 2011

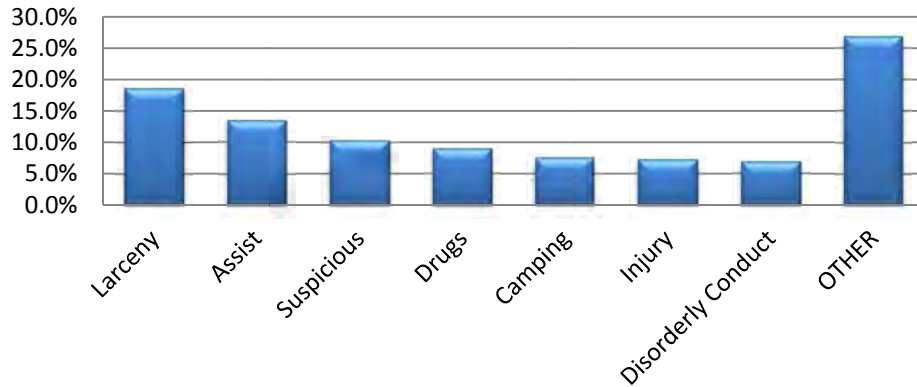
131 Total Incidents



Fort Mason Incidents - 2001

290 Total Incidents

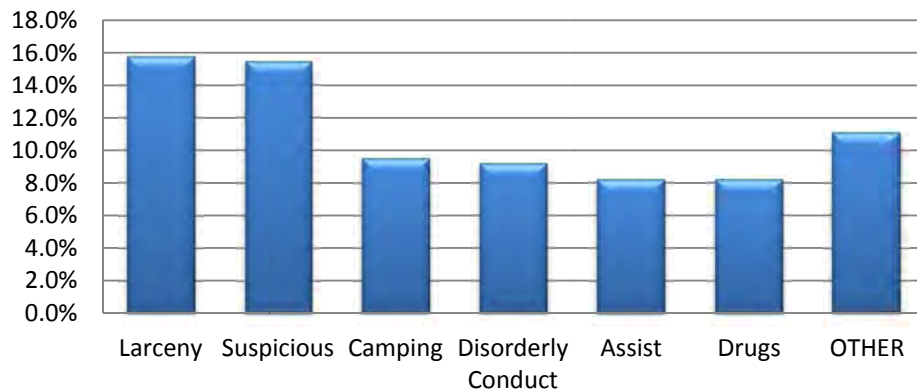
Dog Incidents Included in "Other" = 2.4%



Fort Mason Incidents - 2002

304 Total Incidents

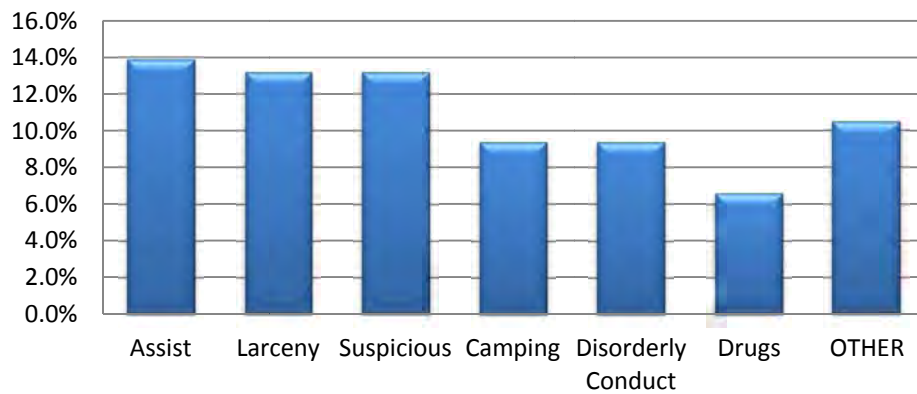
Dog Incidents Included in "Other" = 2.0%



Fort Mason Incidents - 2003

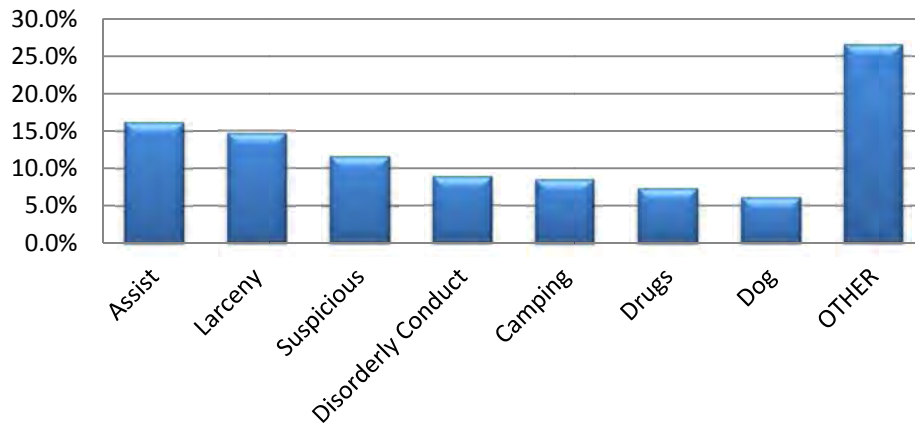
288 Total Incidents

Dog Incidents Included in "Other" = 3.5%



Fort Mason Incidents - 2004

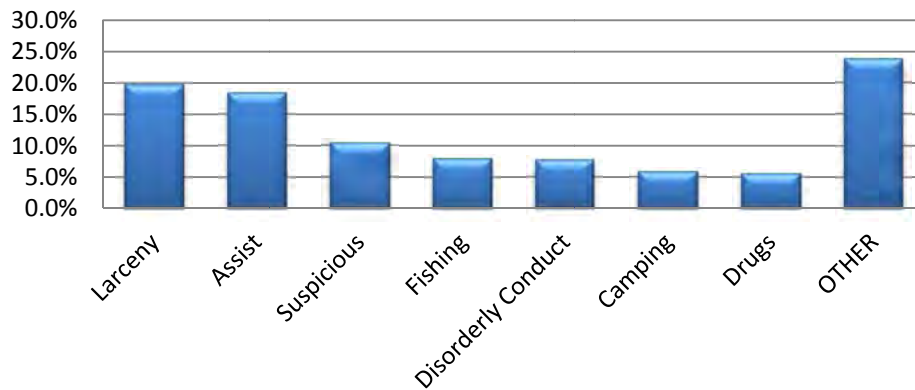
327 Total Incidents



Fort Mason Incidents - 2005

373 Total Incidents

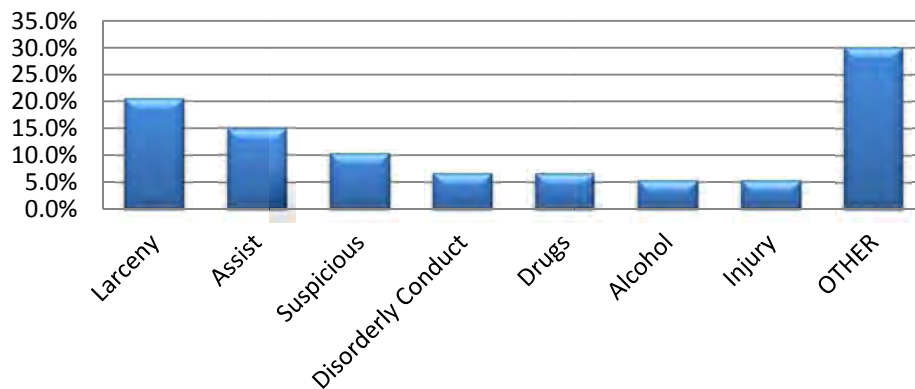
Dog Incidents Included in "Other" = 1.3%



Fort Mason Incidents - 2006

375 Total Incidents

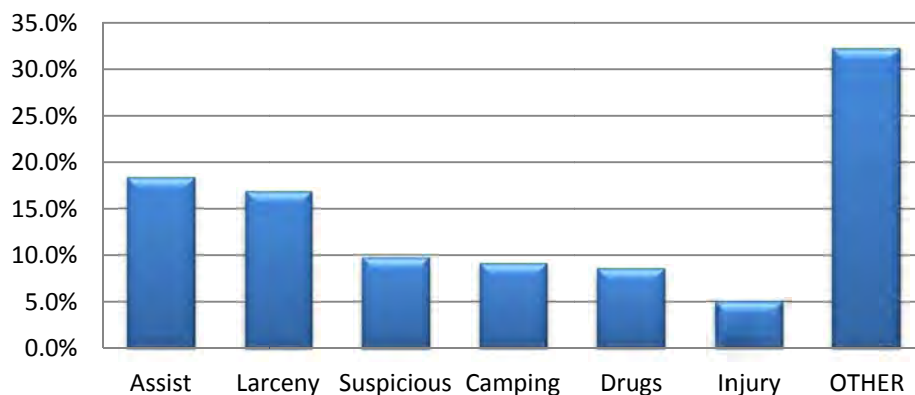
Dog Incidents Included in "Other" = 2.7%



Fort Mason Incidents - 2007

338 Total Incidents

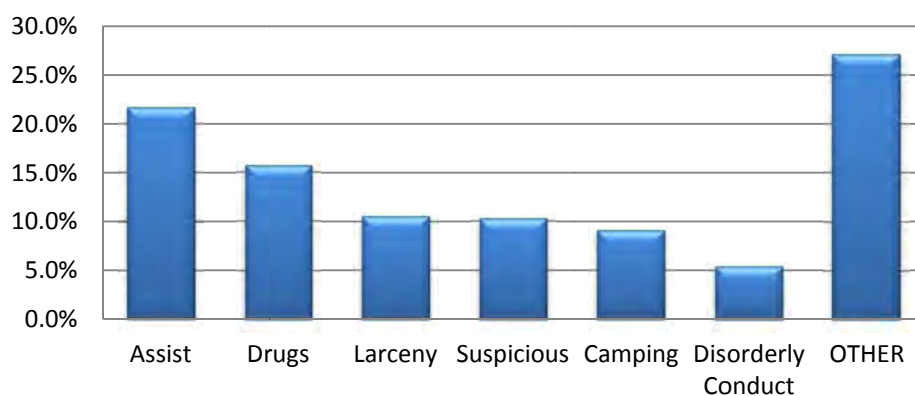
Dog Incidents Included in "Other" = 2.7%



Fort Mason Incidents - 2008

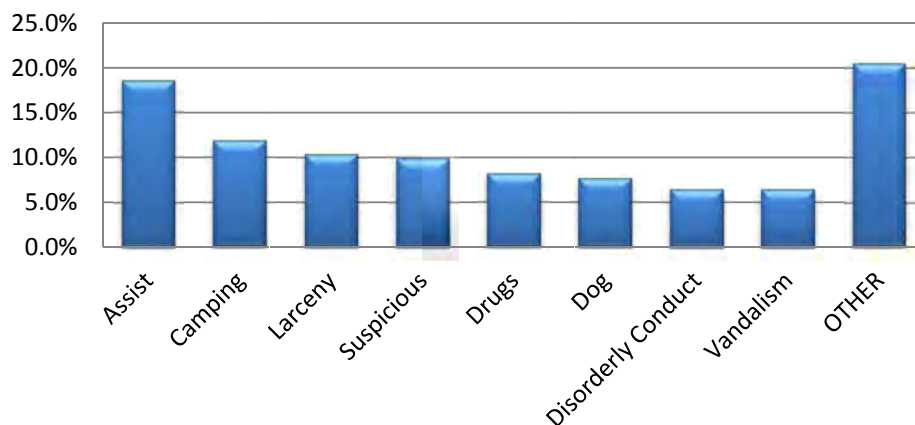
350 Total Incidents

Dog Incidents Included in "Other" = 2.0%



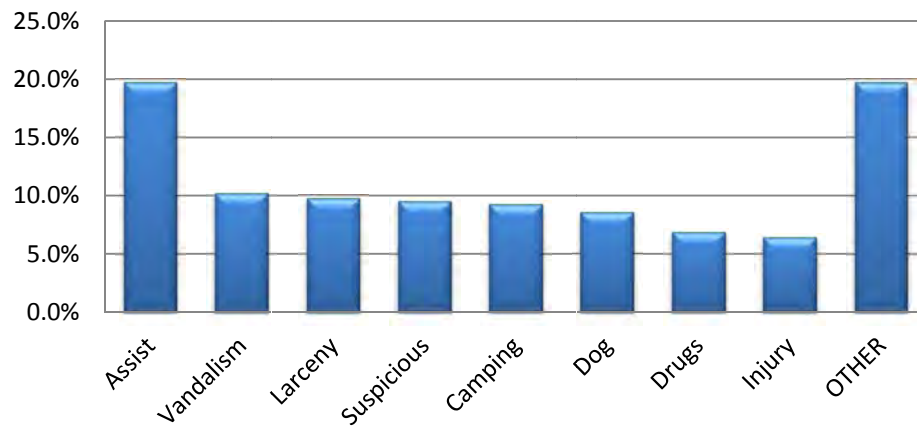
Fort Mason Incidents - 2009

404 Total Incidents



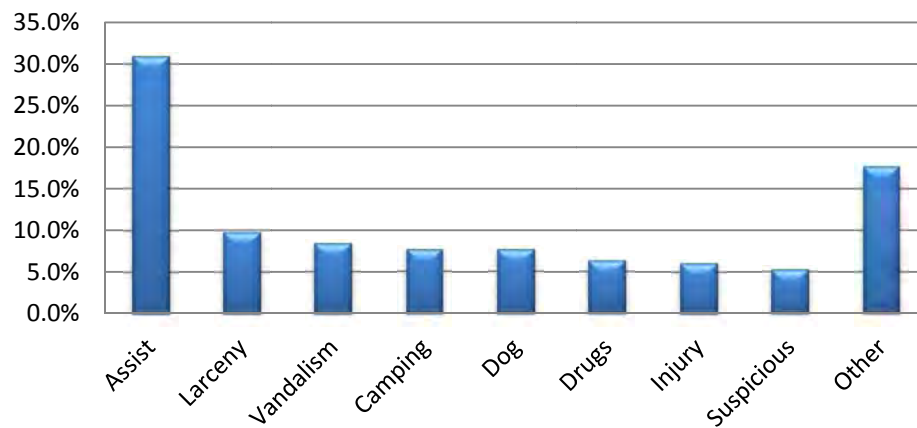
Fort Mason Incidents - 2010

421 Total Incidents



Fort Mason Incidents - 2011

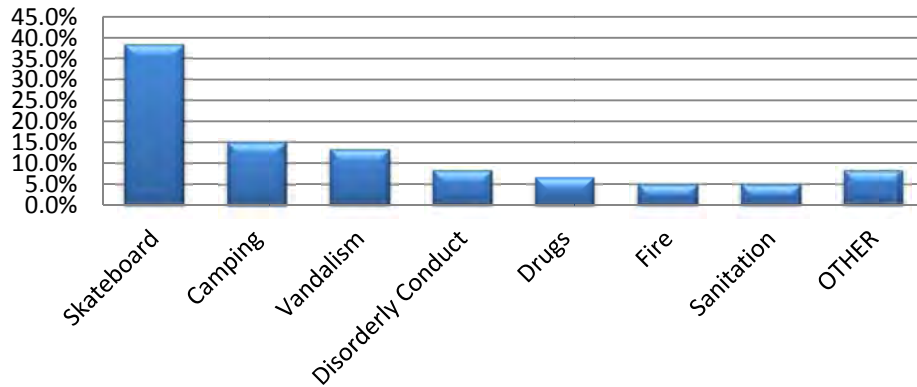
378 Total Incidents



Fort Miley Incidents - 2001

60 Total Incidents

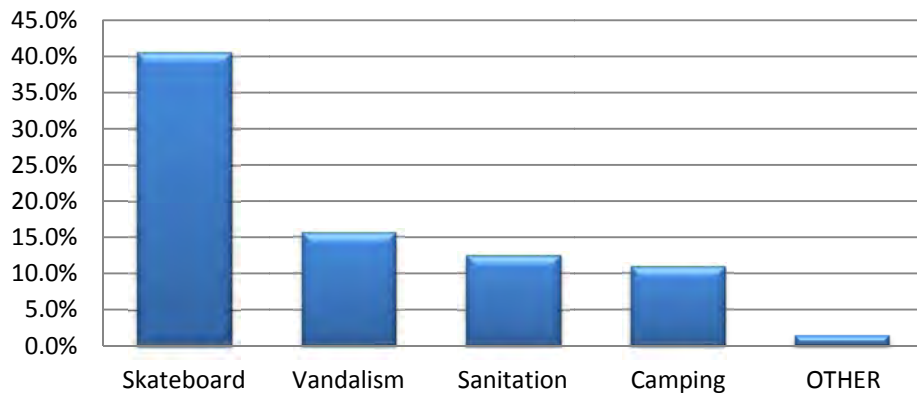
Dog Incidents Included in "Other" = 1.7%



Fort Miley Incidents - 2002

64 Total Incidents

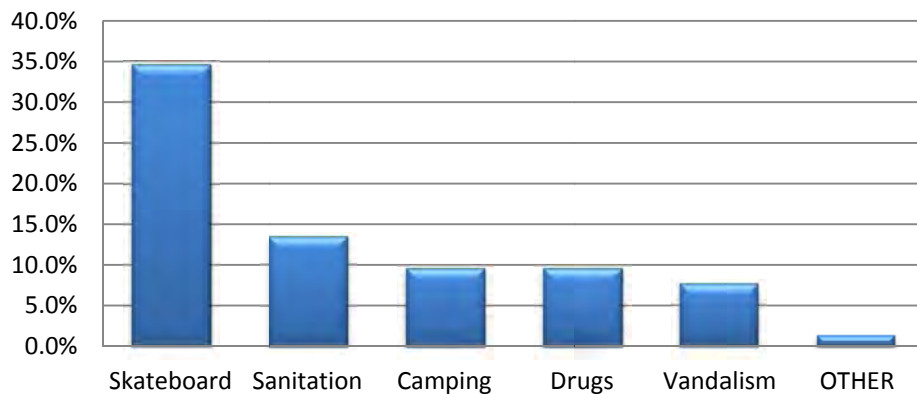
Dog Incidents Included in "Other" = 4.7%



Fort Miley Incidents - 2003

52 Total Incidents

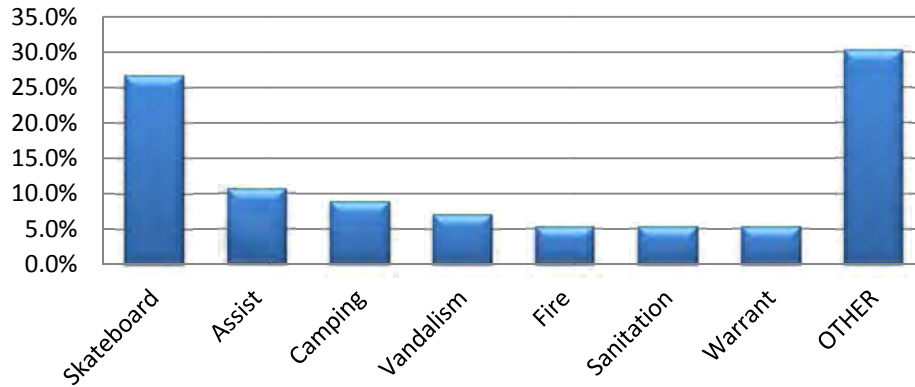
Dog Incidents Included in "Other" = 1.9%



Fort Miley Incidents - 2004

56 Total Incidents

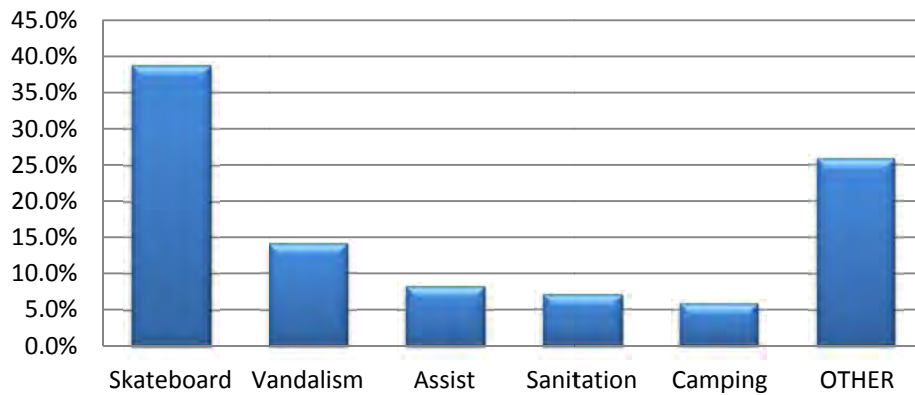
Dog Incidents Included in "Other" = 3.6%



Fort Miley Incidents - 2005

85 Total Incidents

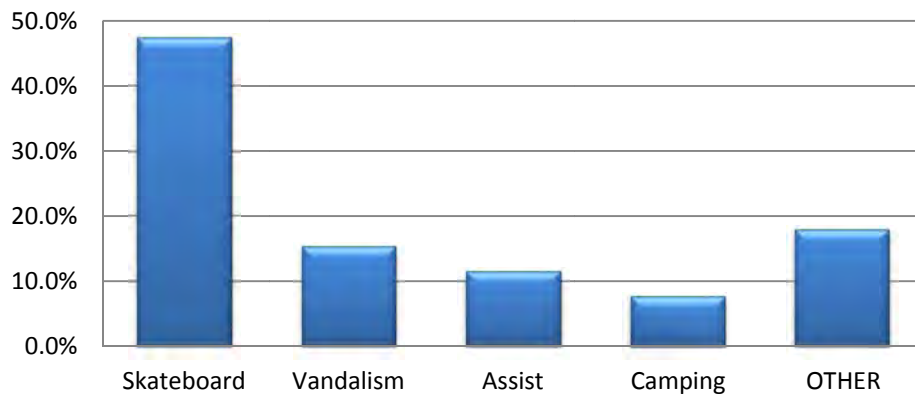
NO Dog Incidents

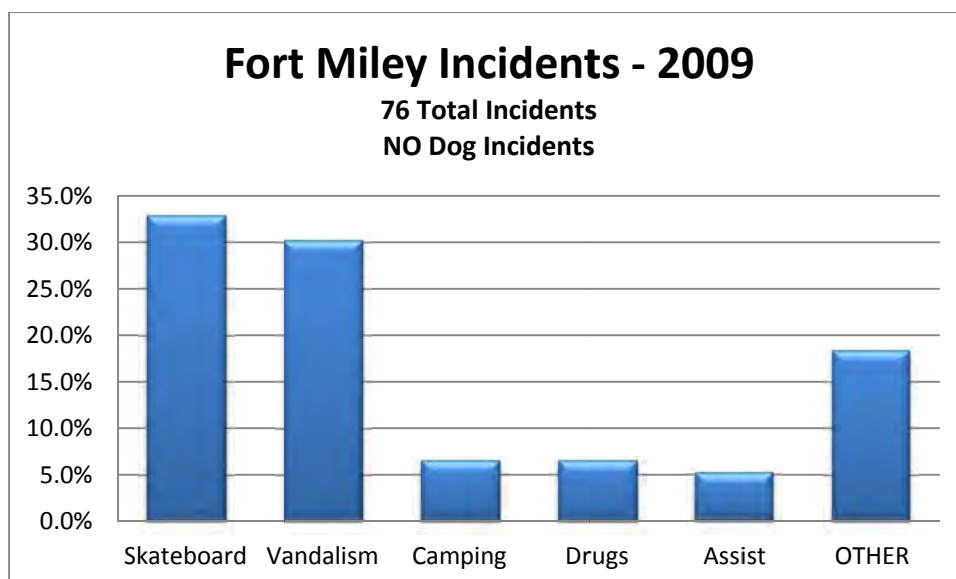
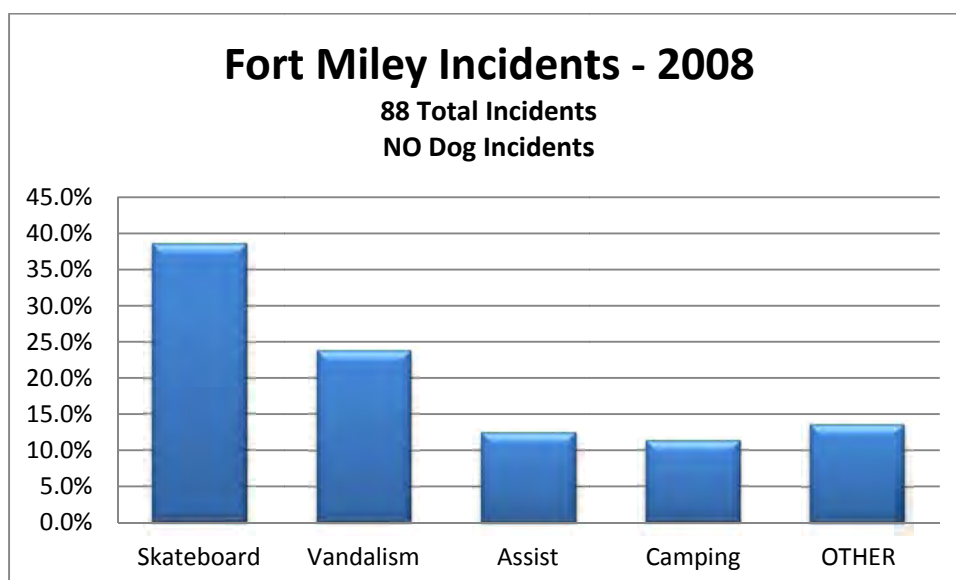
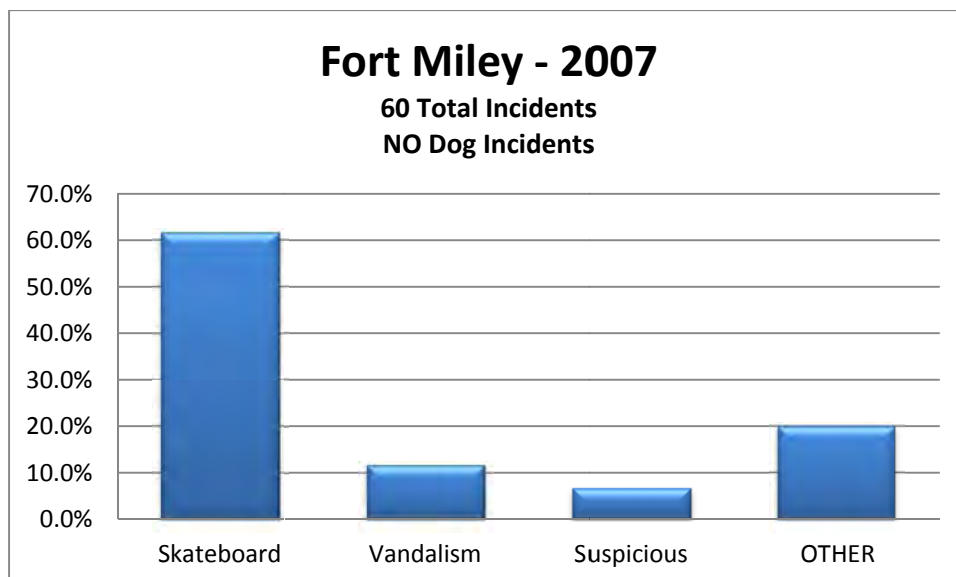


Fort Miley Incidents - 2006

78 Total Incidents

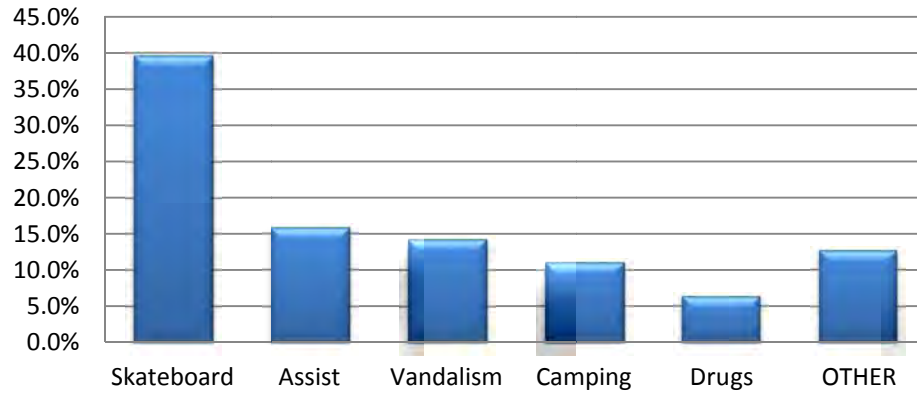
NO Dog Incidents





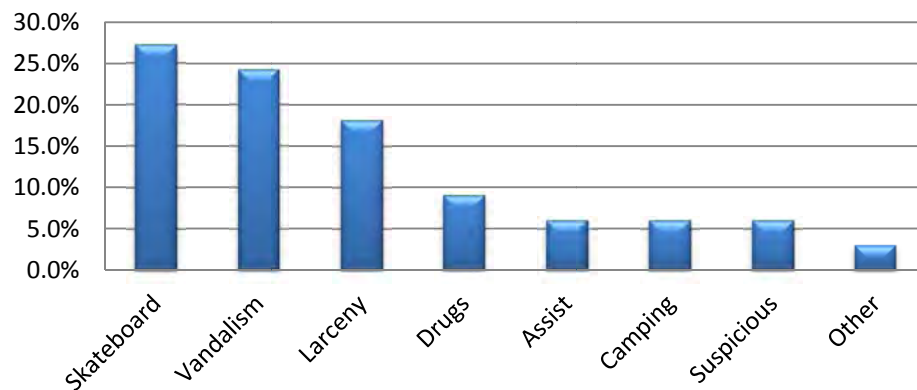
Fort Miley Incidents - 2010

63 Total Incidents
NO Dog Incidents



Fort Miley Incidents - 2011

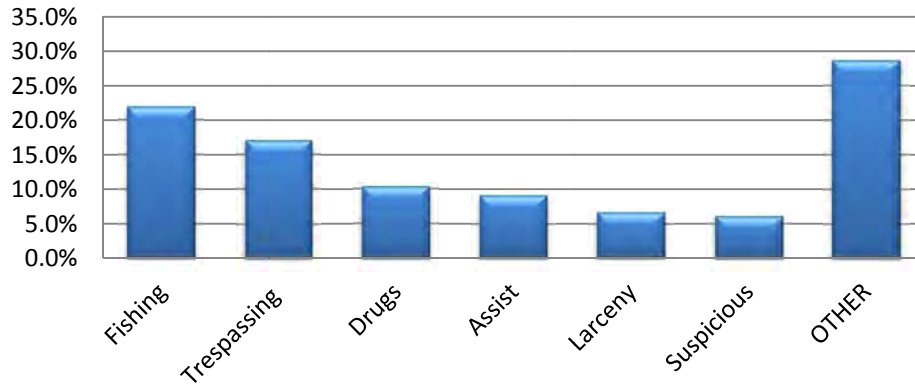
33 Total Incident
NO Dog Incidents



Fort Point Incidents - 2001

164 Total Incidents

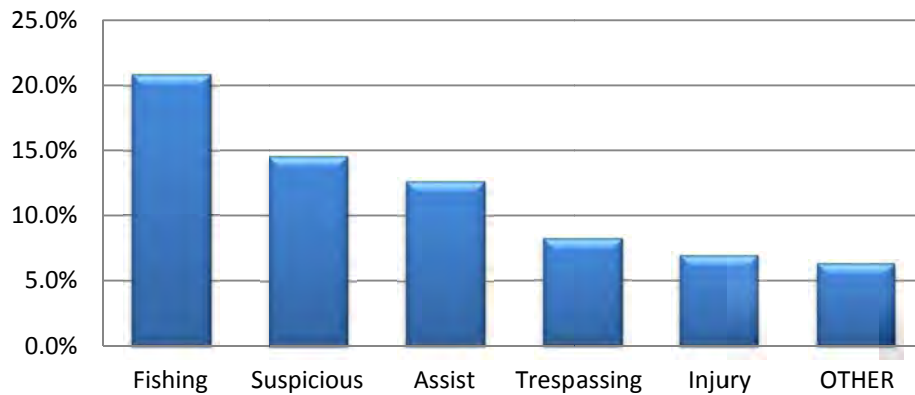
Dog Incidents Included in "Other" = 0.6%



Fort Point Incidents - 2002

158 Total Incidents

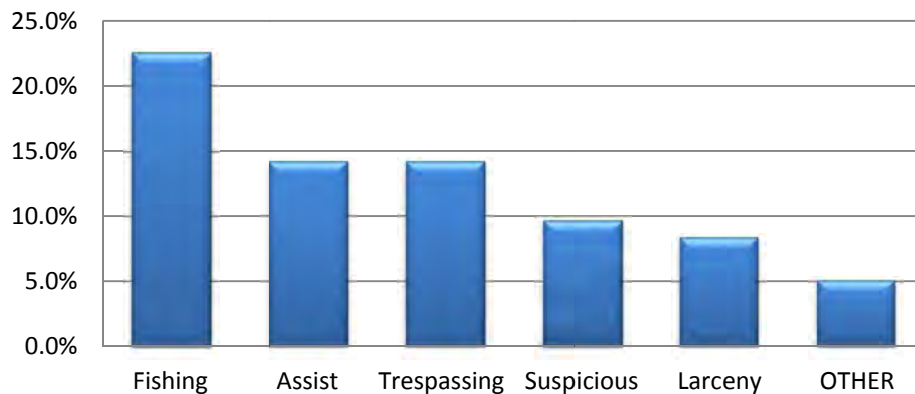
Dog Incidents Included in "Other" = 3.2%



Fort Point Incidents - 2003

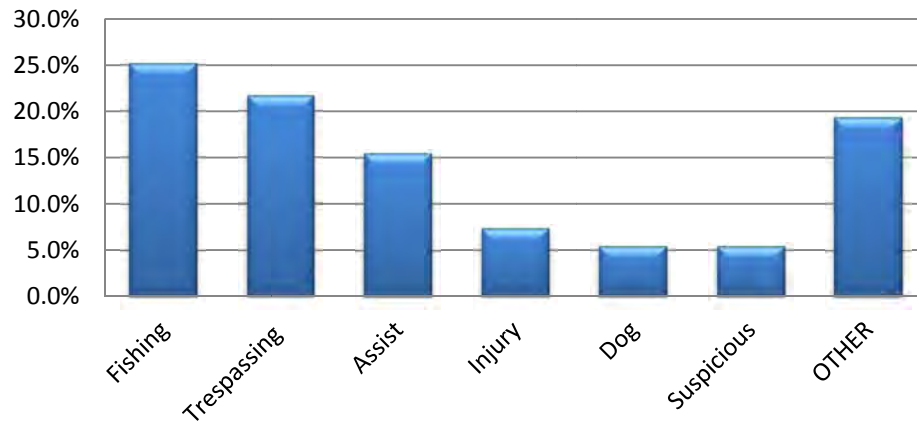
155 Total Incidents

Dog Incidents Included in "Other" = 1.3%



Fort Point Incidents - 2004

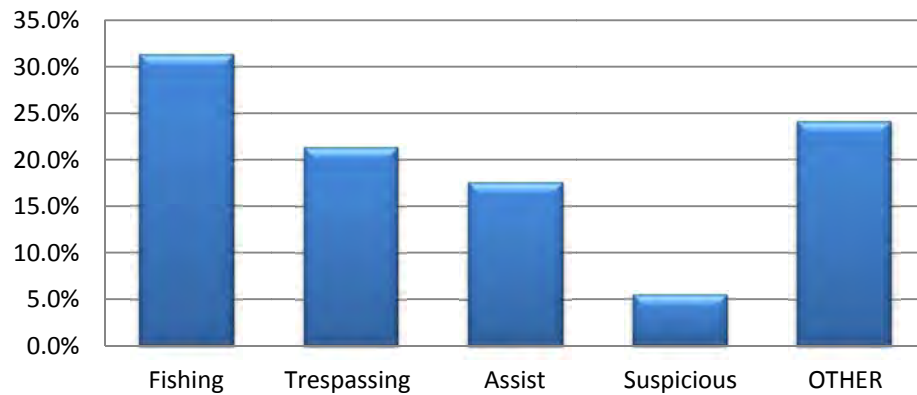
258 Total Incidents



Fort Point Incidents - 2005

290 Total Incidents

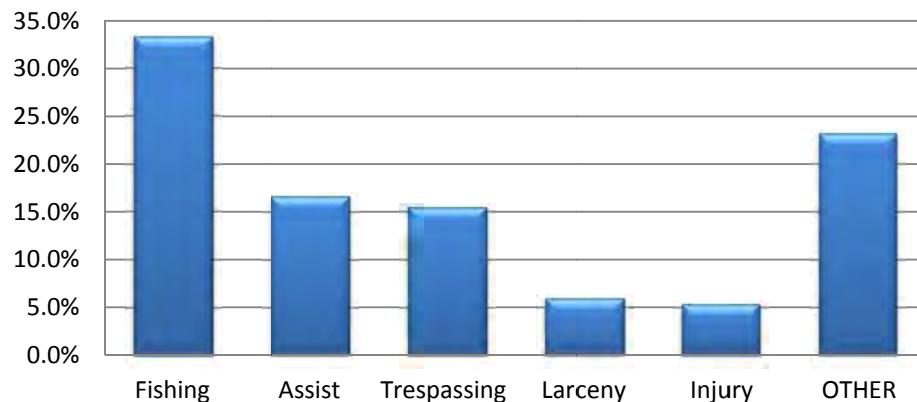
Dog Incidents Included in "Other" = 3.1%

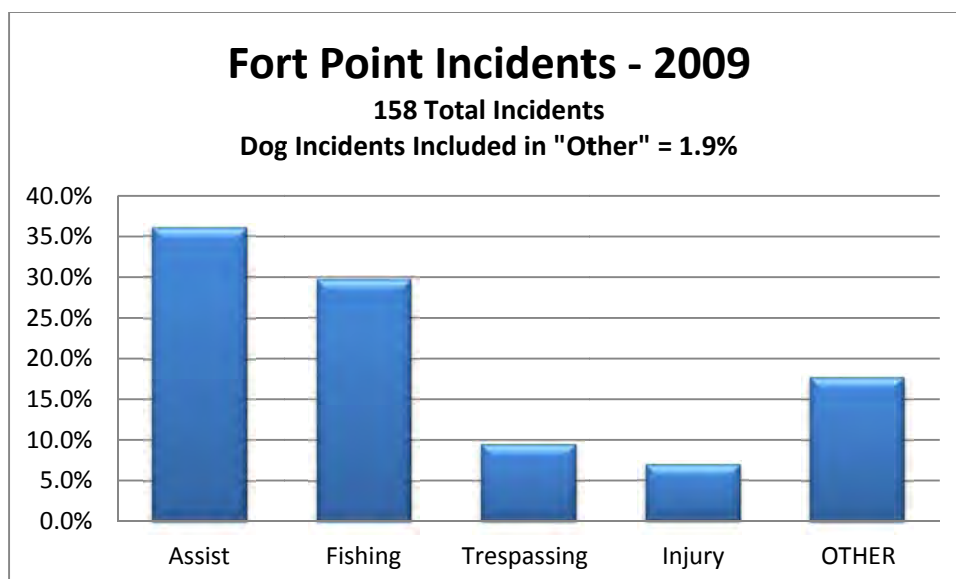
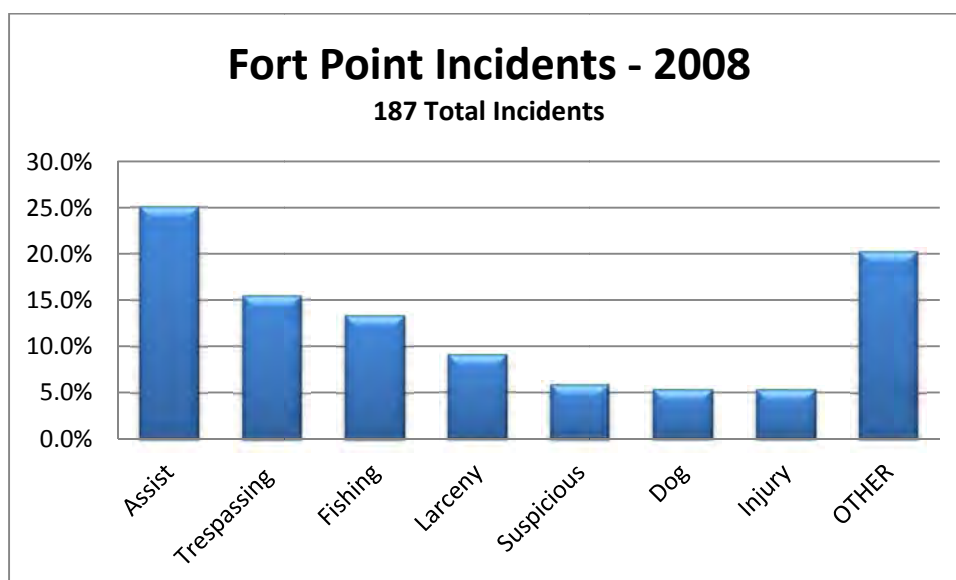
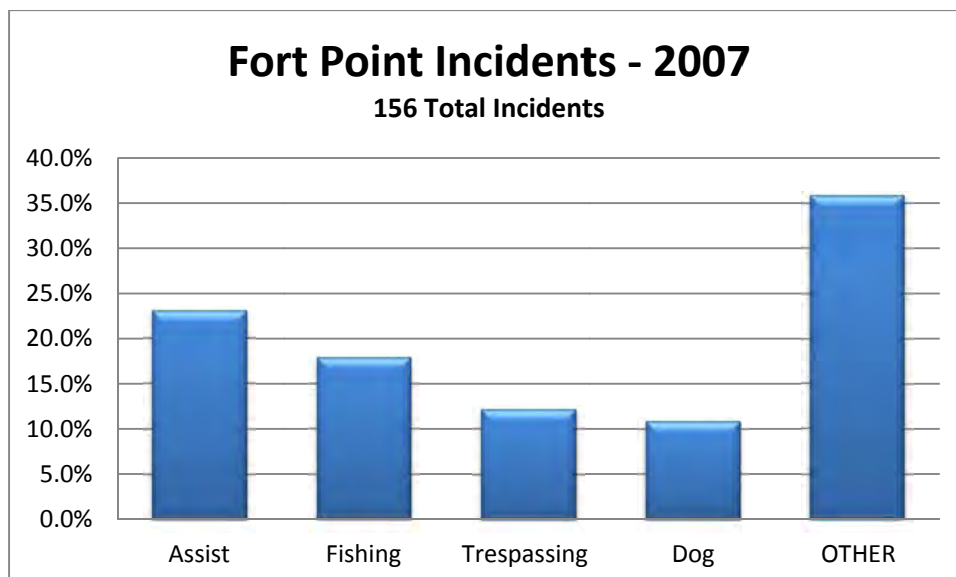


Fort Point Incidents - 2006

168 Total Incidents

Dog Incidents Included in "Other" = 1.2%

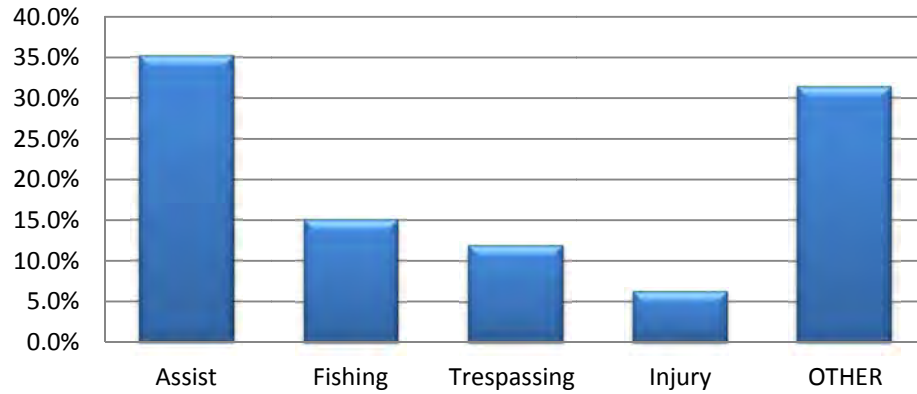




Fort Point Incidents - 2010

159 Total Incidents

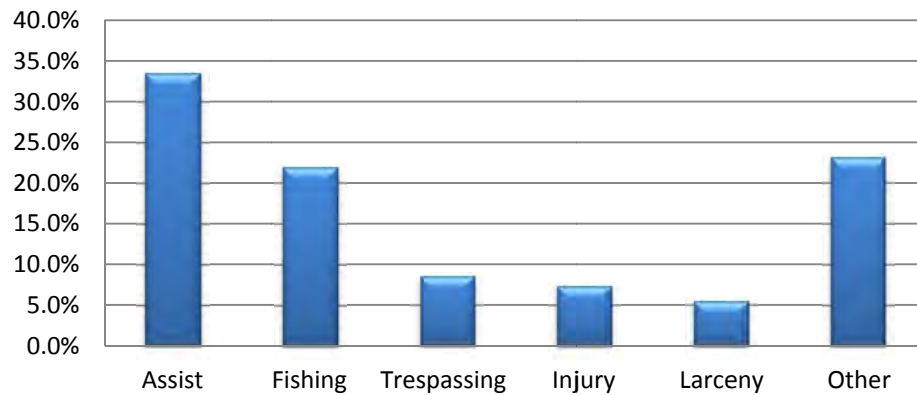
Dog Incidents Included in "Other" = 4.4%



Fort Point Incidents - 2011

164 Total Incidents

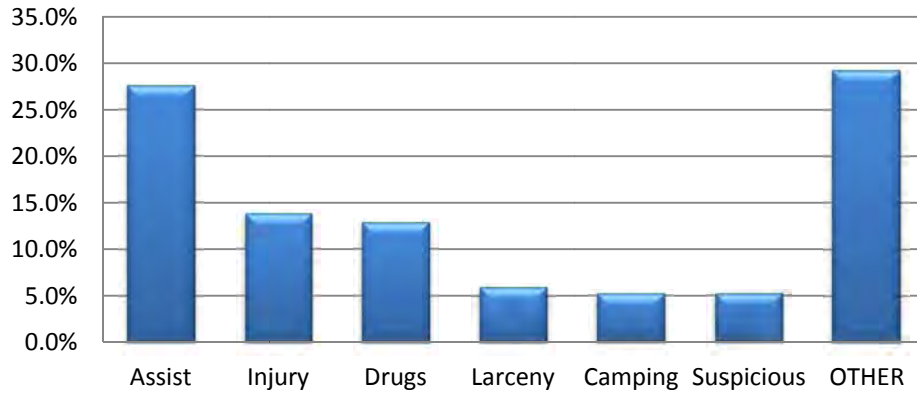
Dog Incidents Included in "Other" = 1.2%



Marin Headlands Incidents - 2001

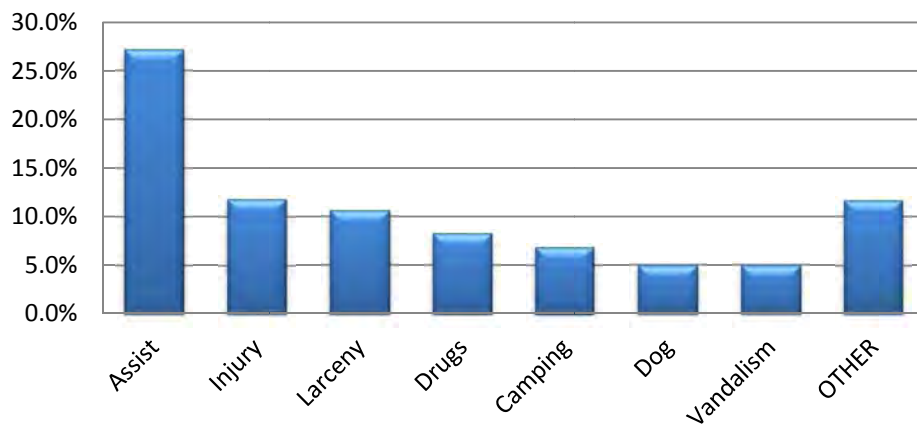
420 Total Incidents

Dog Incidents Included in "Other" = 3.3%



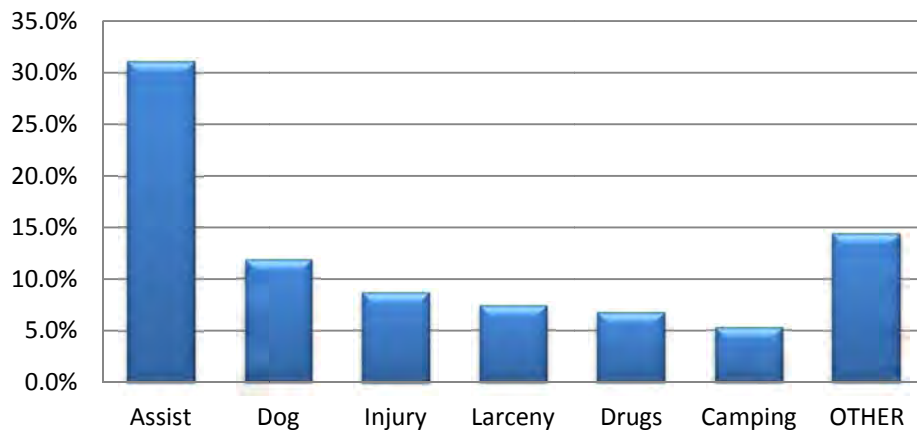
Marin Headlands Incidents - 2002

423 Total Incidents



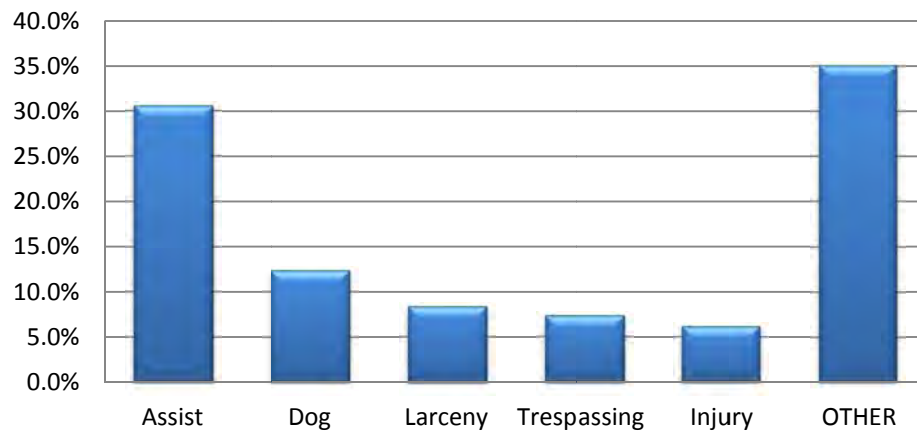
Marin Headlands Incidents - 2003

472 Total Incidents



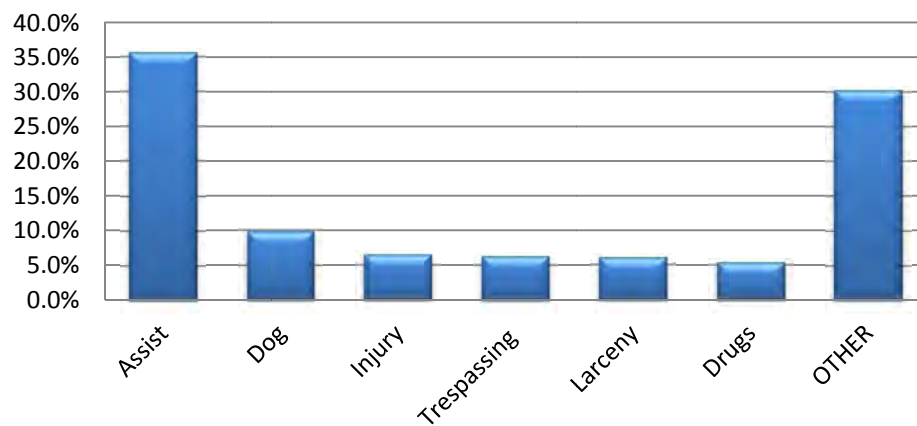
Marin Headlands Incidents - 2004

598 Total Incidents



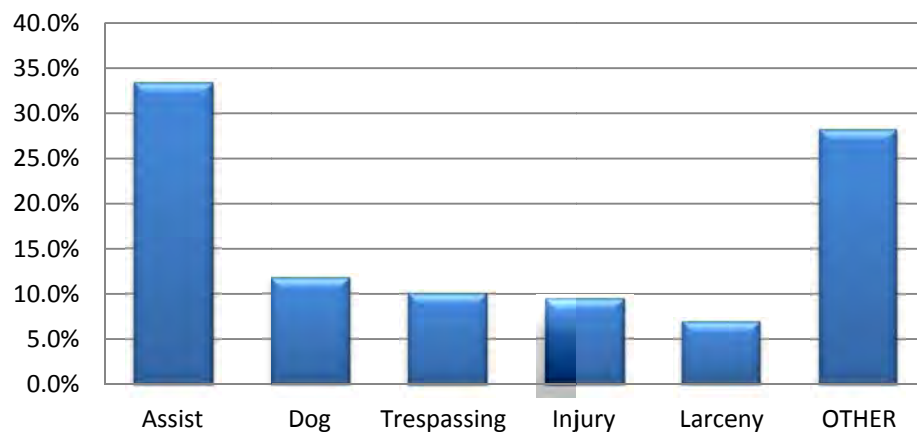
Marin Headlands Incidents - 2005

446 Total Incidents



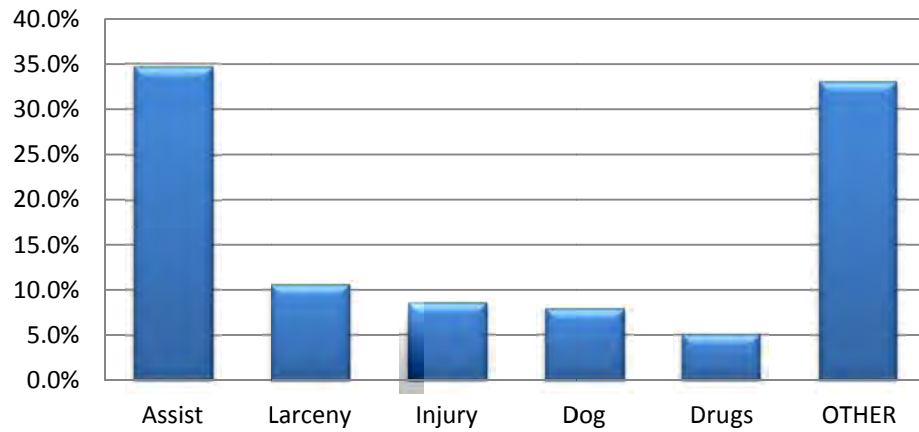
Marin Headlands Incidents - 2006

517 Total Incidents



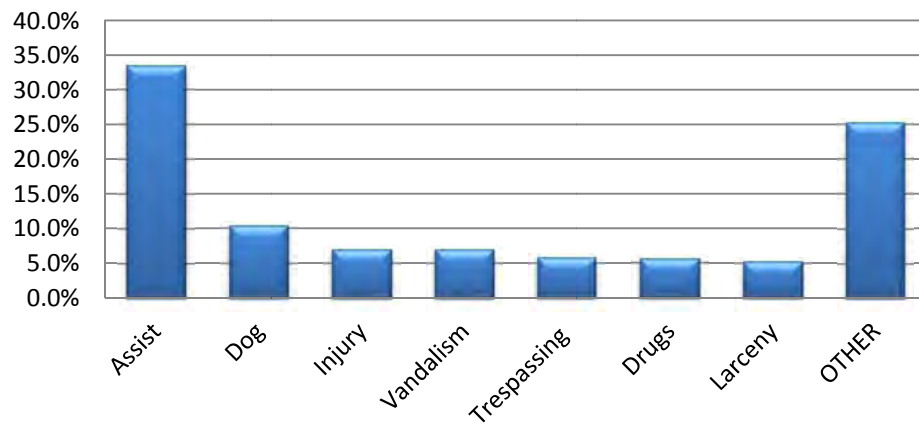
Marin Headlands Incidents - 2007

593 Total Incidents



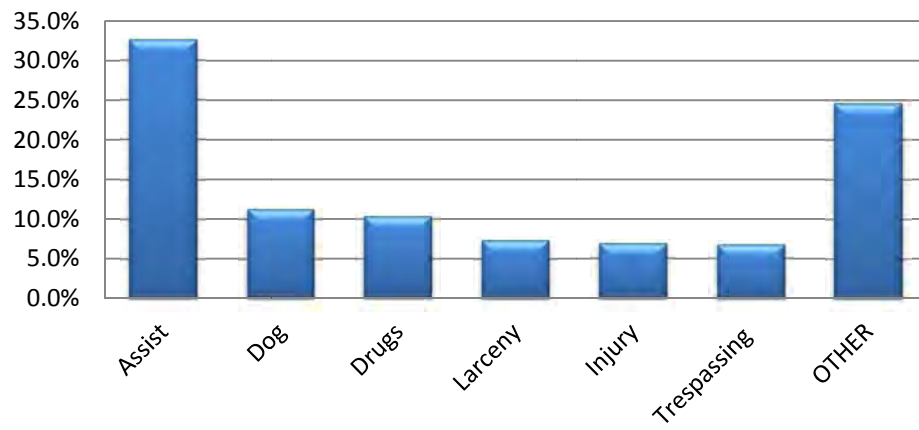
Marin Headlands Incidents - 2008

585 Total Incidents



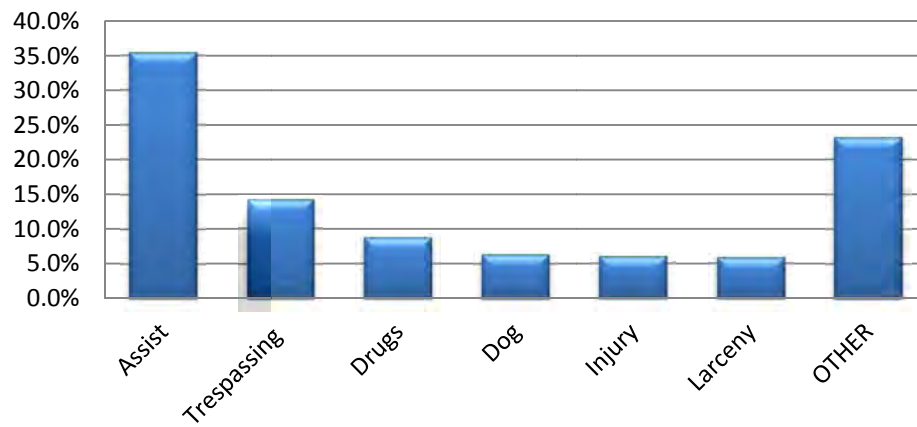
Marin Headlands Incidents - 2009

665 Total Incidents



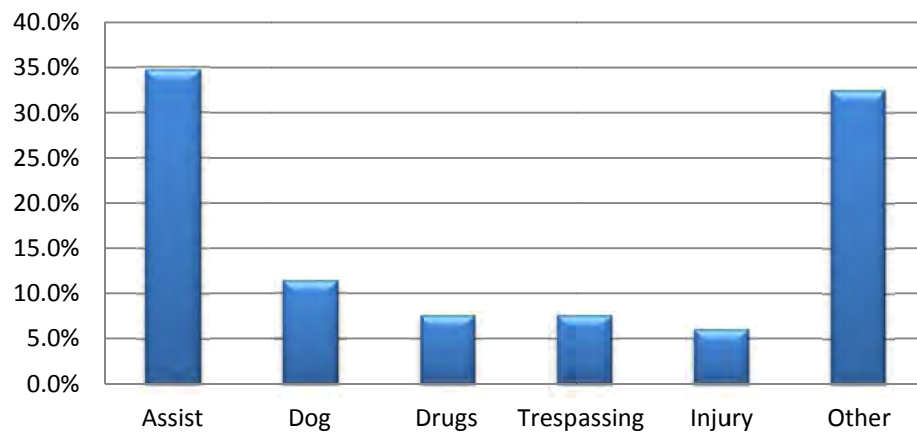
Marin Headlands Incidents - 2010

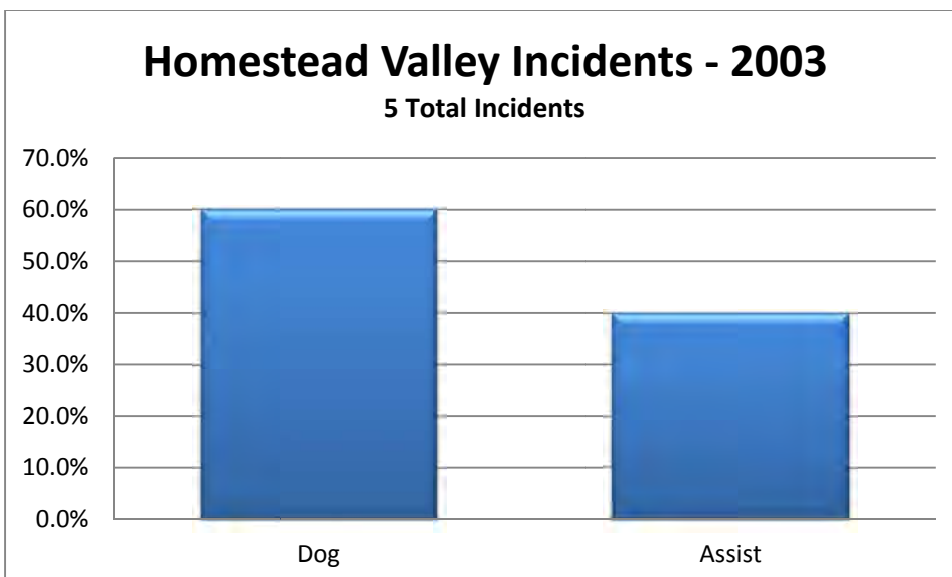
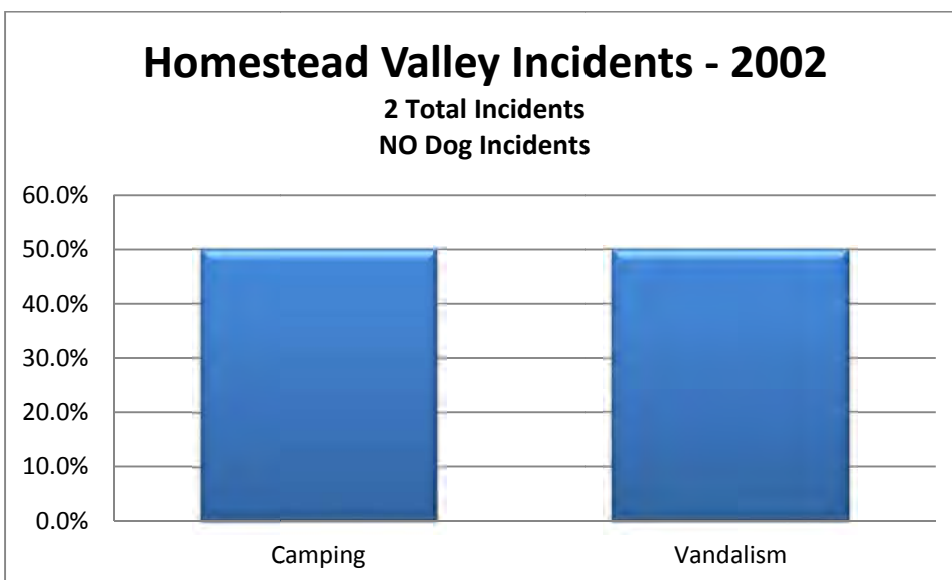
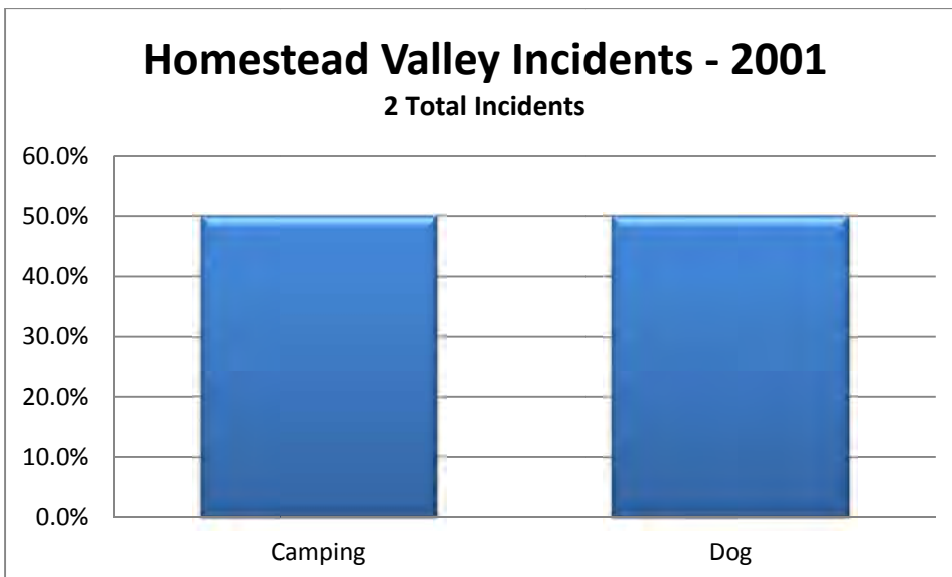
612 Total Incidents



Marin Headlands Incidents - 2011

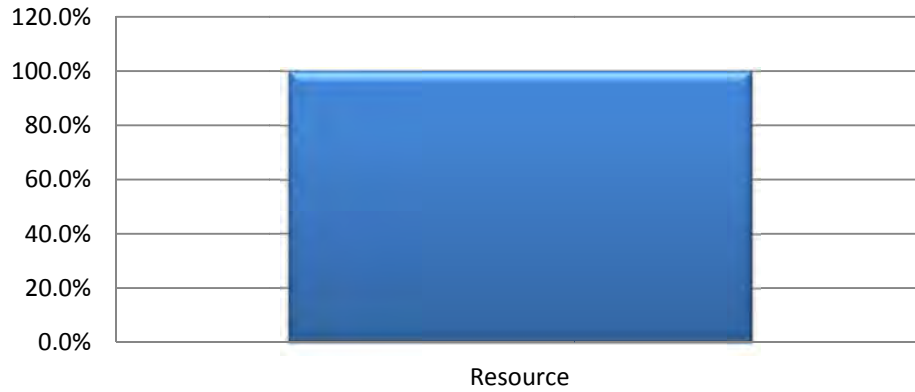
630 Total Incidents





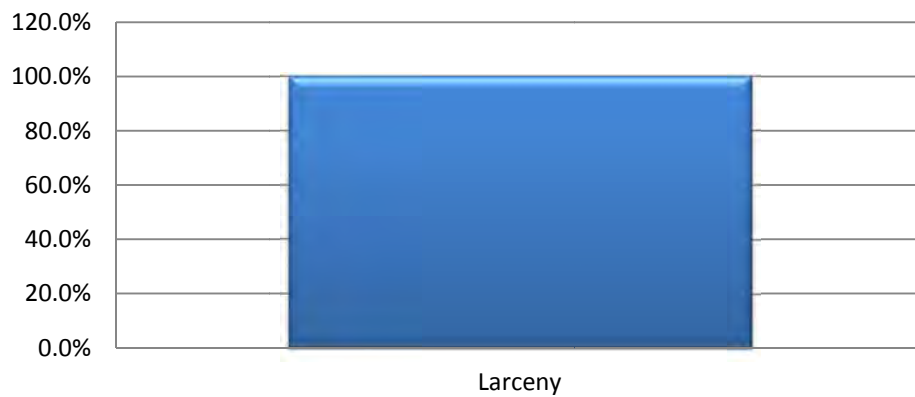
Homestead Valley Incidents - 2005

1 Total Incident
NO Dog Incidents



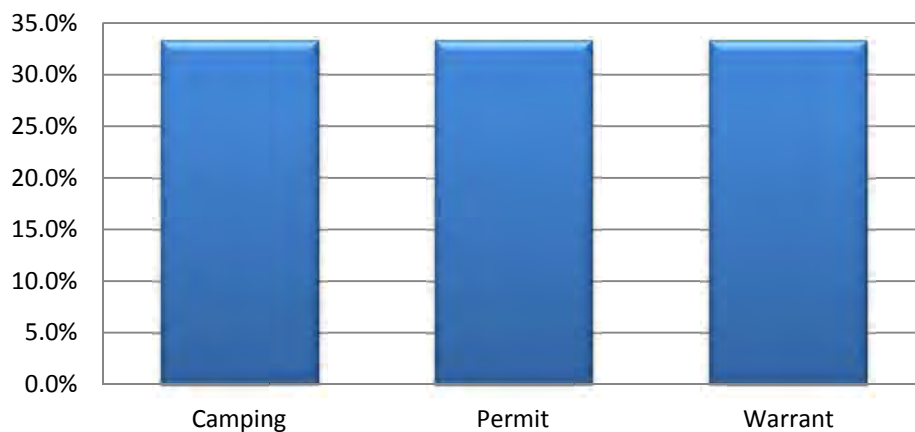
Homestead Valley Incidents - 2007

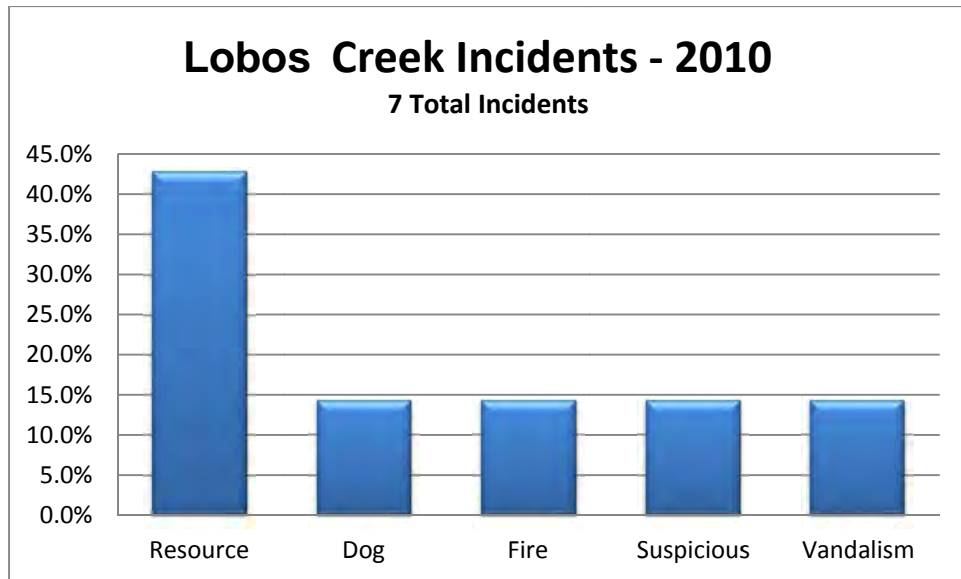
1 Total Incident
NO Dog Incidents



Homestead Valley Incidents - 2010

3 Total Incidents

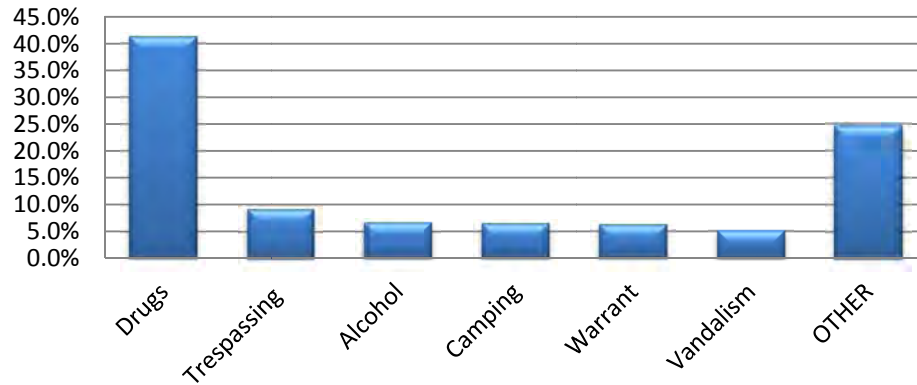




Lands End Incidents - 2001

445 Total Incidents

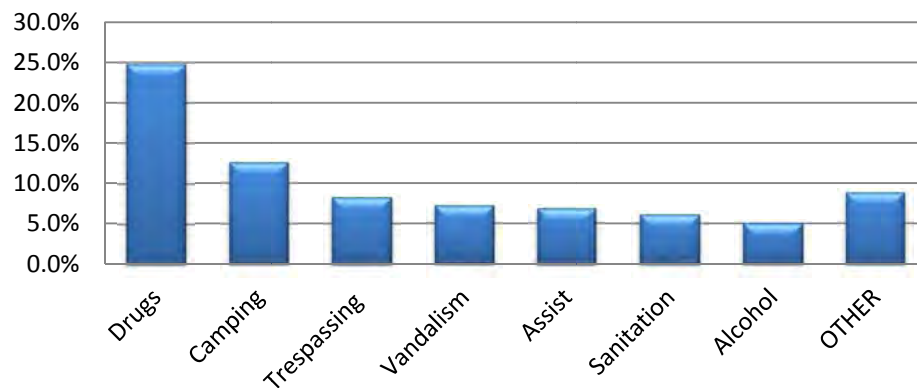
Dog Incidents Included in "Other" = 2.0%



Lands End Incidents - 2002

278 Total Incidents

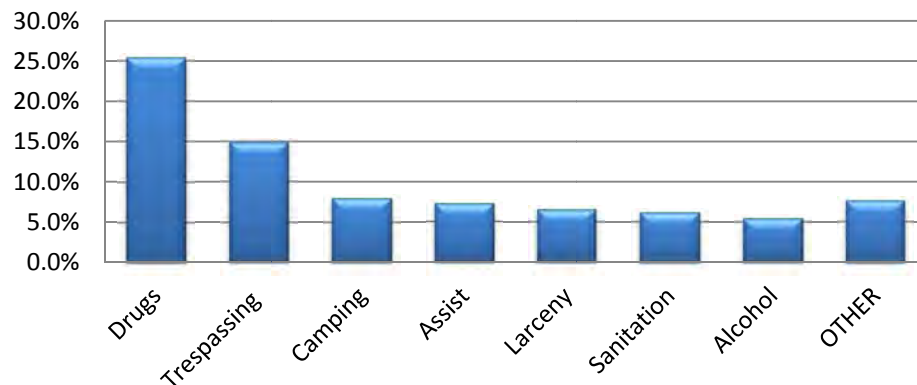
Dog Incidents Included in "Other" = 1.8%



Lands End Incidents - 2003

275 Total Incidents

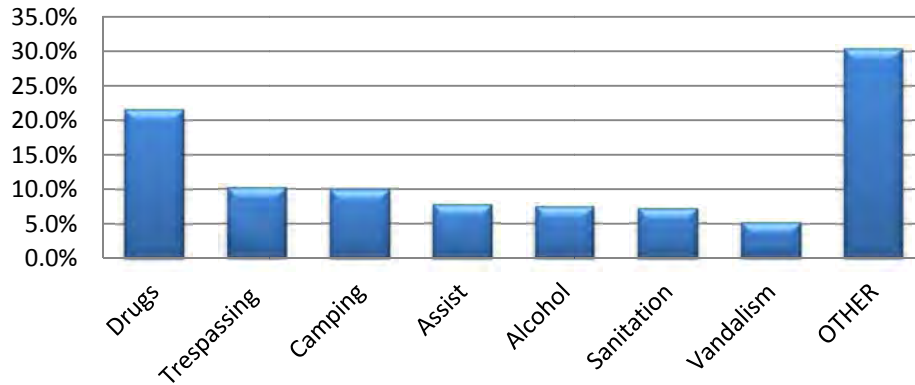
Dog Incidents Included in "Other" = 3.3%



Lands End Incidents - 2004

361 Total Incidents

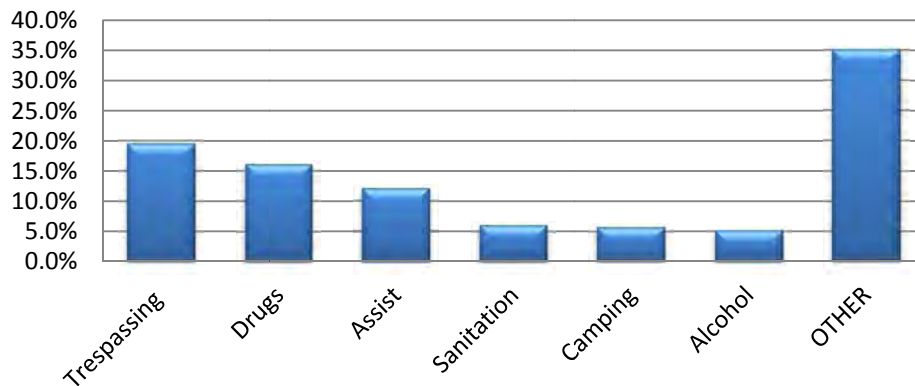
Dog Incidents Included in "Other" = 4.2%



Lands End Incidents - 2005

347 Total Incidents

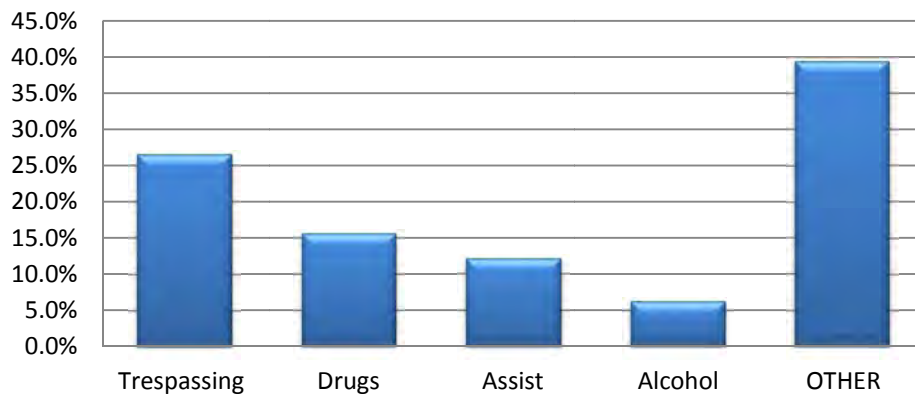
Dog Incidents Included in "Other" = 4.3%



Lands End Incidents - 2006

256 Total Incidents

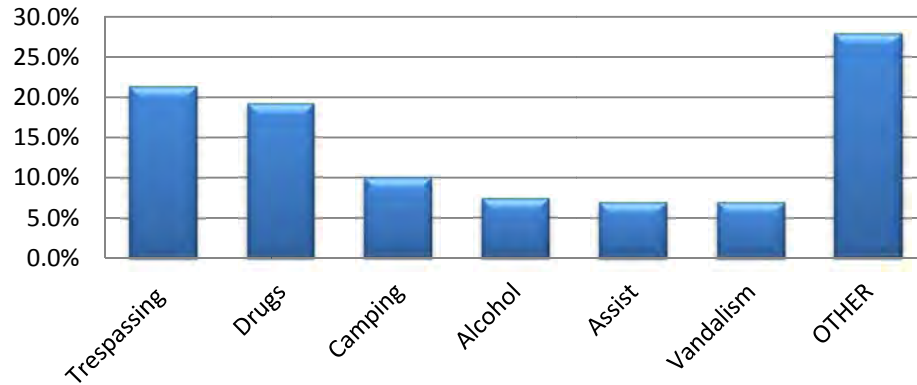
Dog Incidents Included in "Other" = 2.0%



Lands End Incidents - 2007

229 Total Incidents

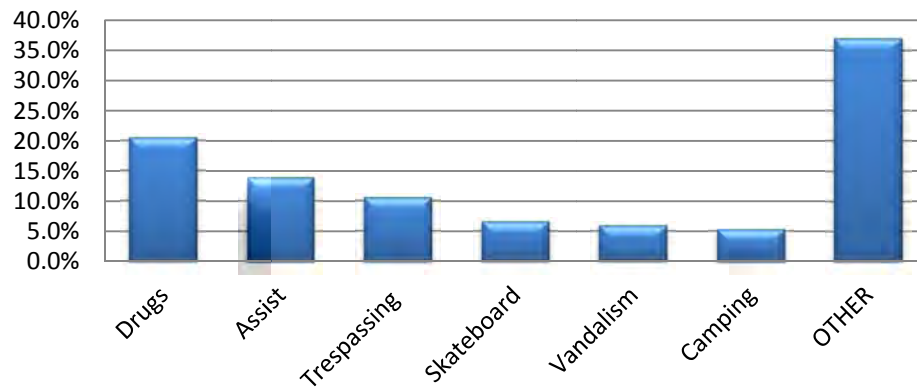
Dog Incidents Included in "Other" = 2.2%



Lands End Incidents - 2008

151 Total Incidents

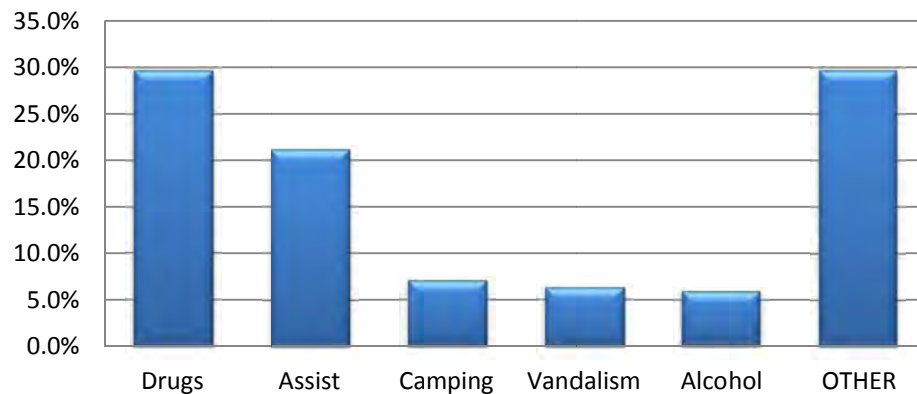
Dog Incidents Included in "Other" = 3.3%



Lands End Incidents - 2009

269 Total Incidents

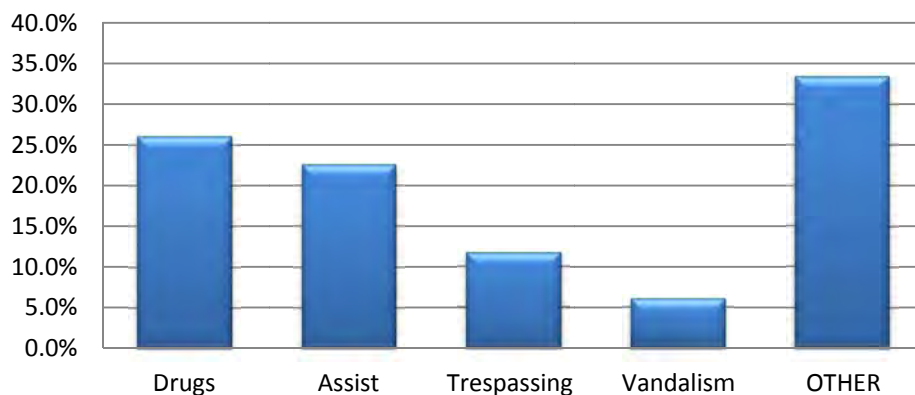
NO Dog Incidents



Lands End Incidents - 2010

230 Total Incidents

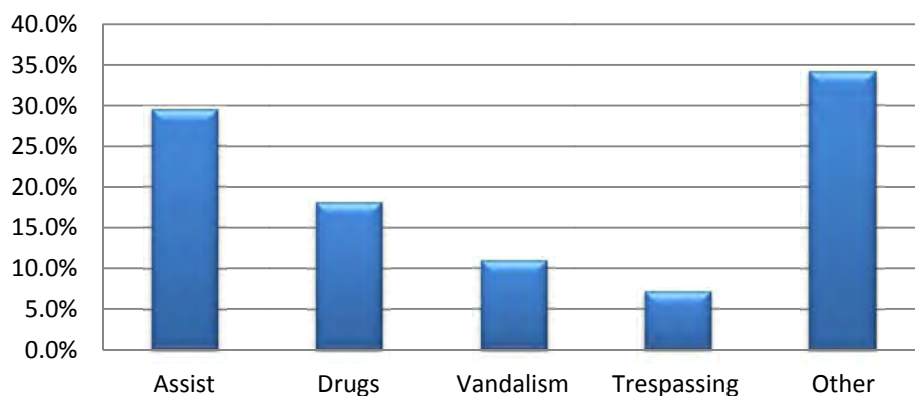
Dog Incidents Included in "Other" = 2.2%



Lands End Incidents - 2011

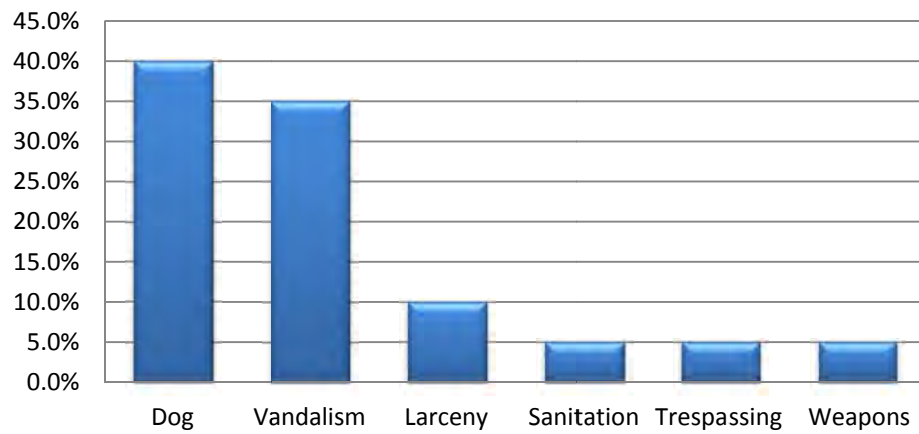
237 Total Incidents

Dog Incidents Included in "Other" = 2.1%



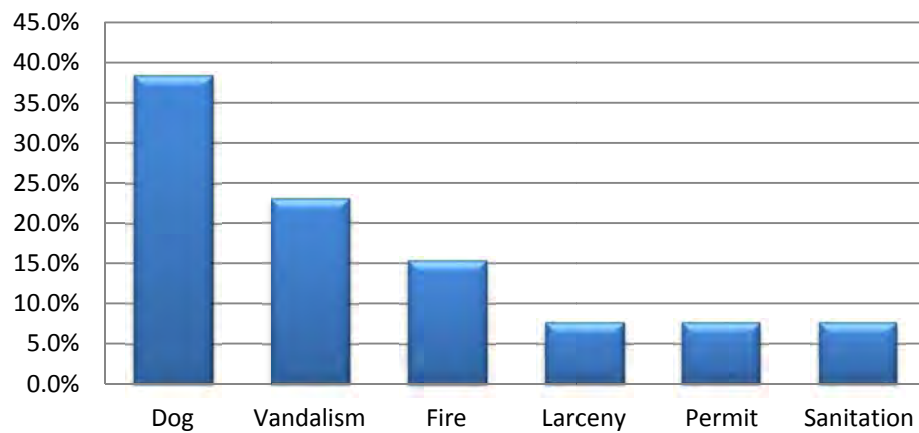
Milagra Ridge Incidents - 2001

20 Total Incidents



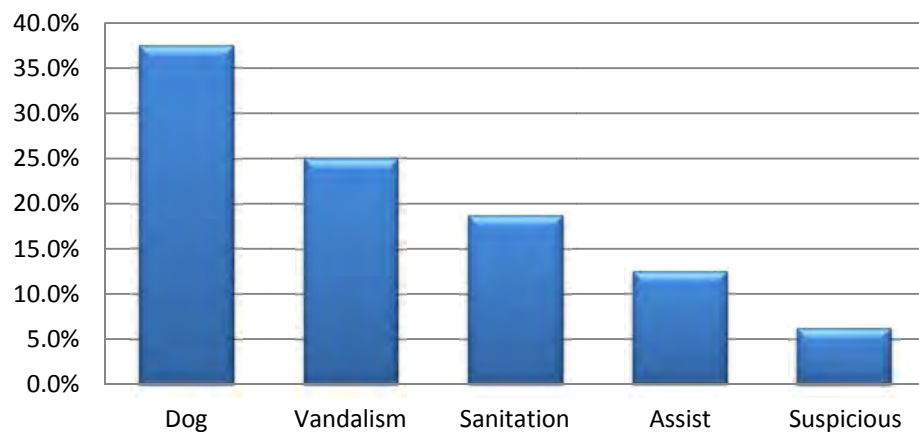
Milagra Ridge Incidents - 2002

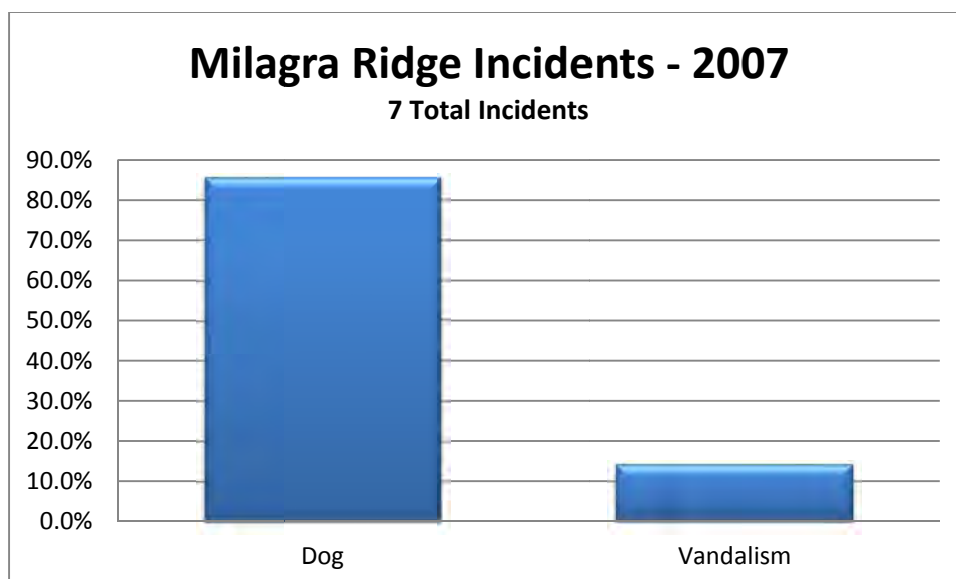
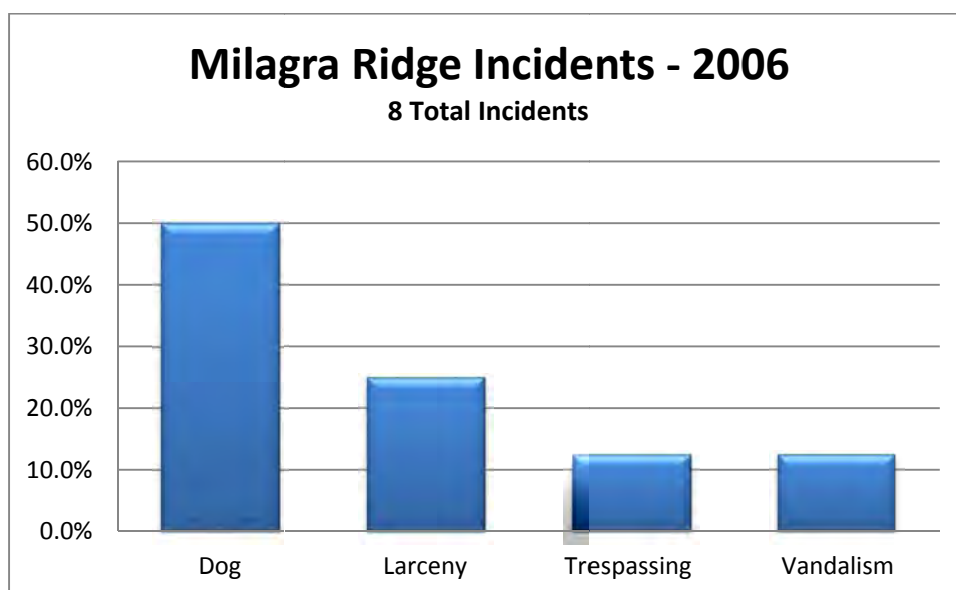
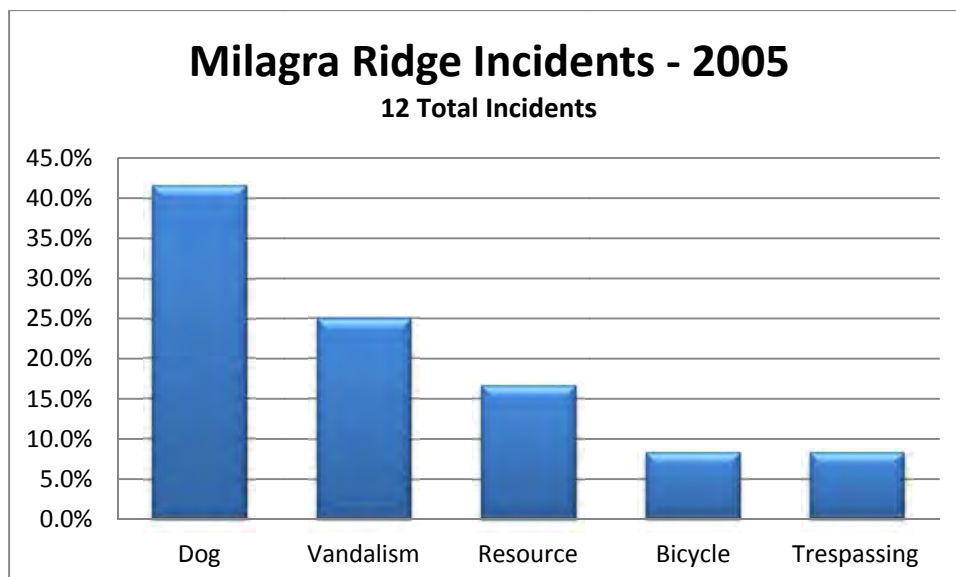
13 Total Incidents



Milagra Ridge Incidents - 2003

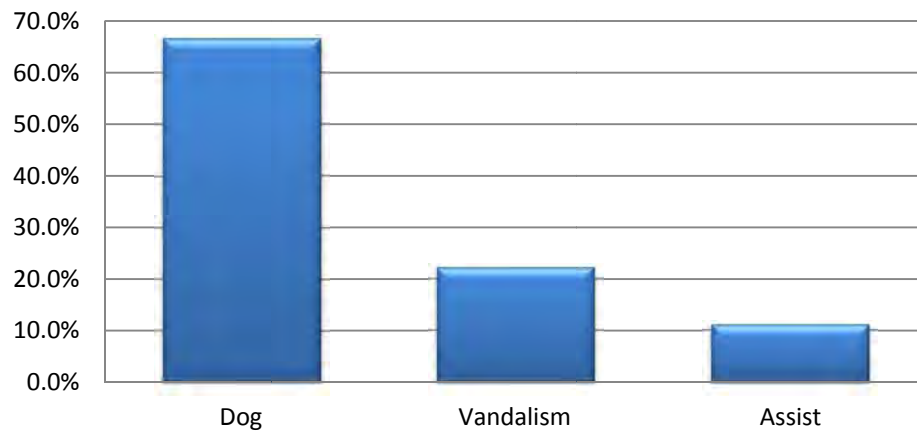
16 Total Incidents





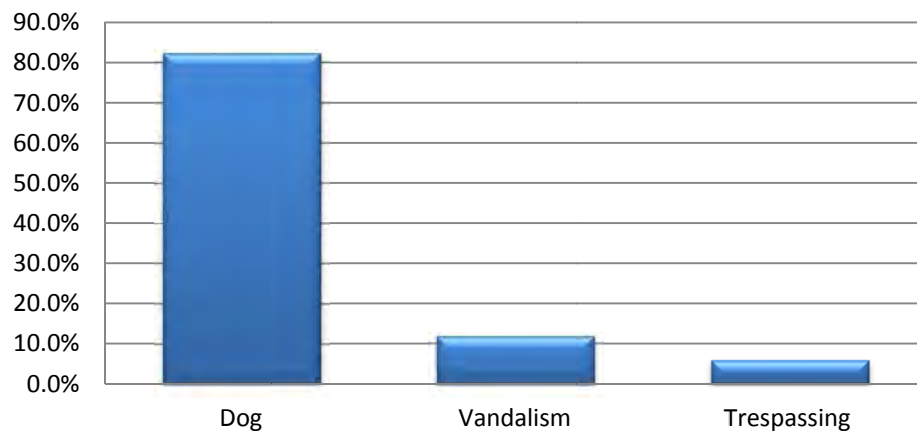
Milagra Ridge Incidents - 2008

9 Total Incidents



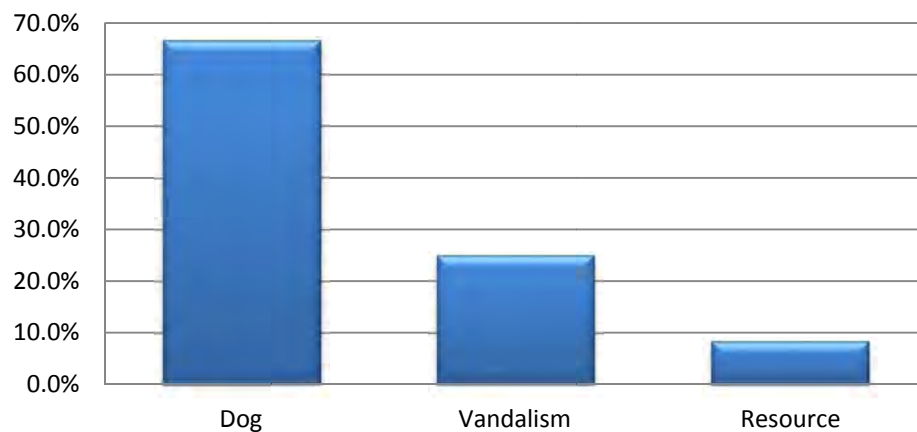
Milagra Ridge Incidents - 2009

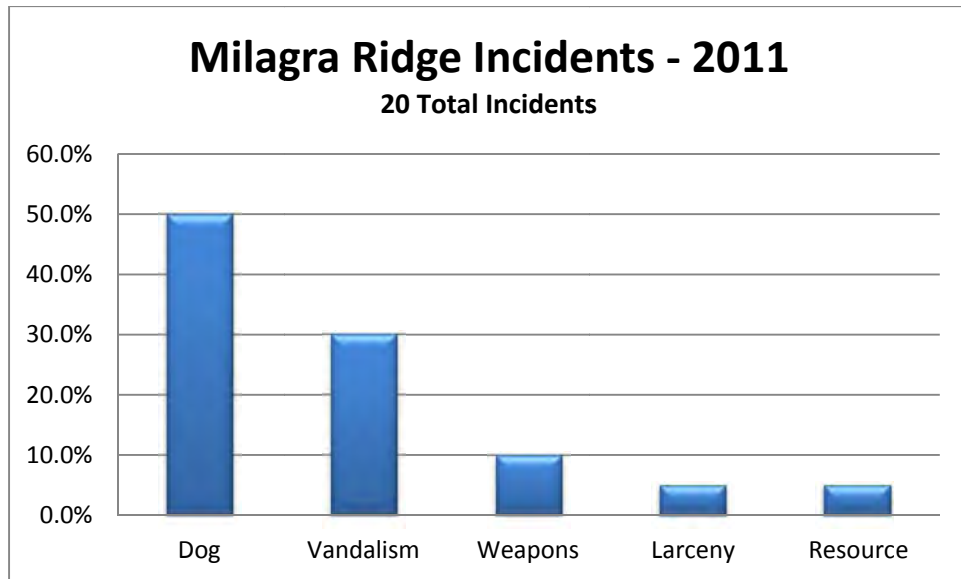
17 Total Incidents



Milagra Ridge Incidents - 2010

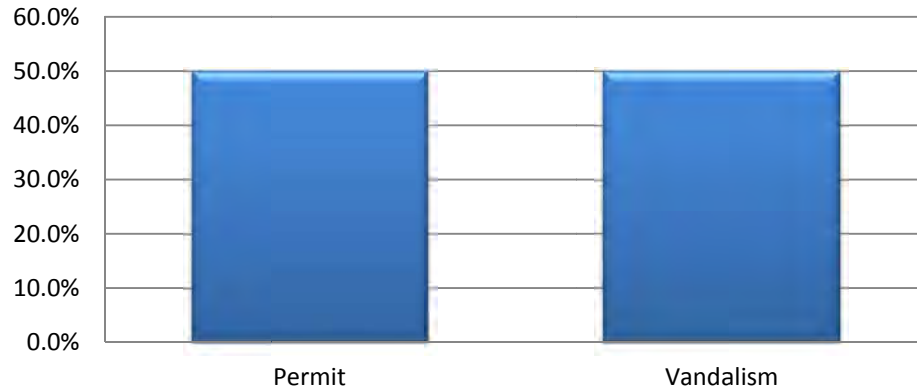
12 Total Incidents





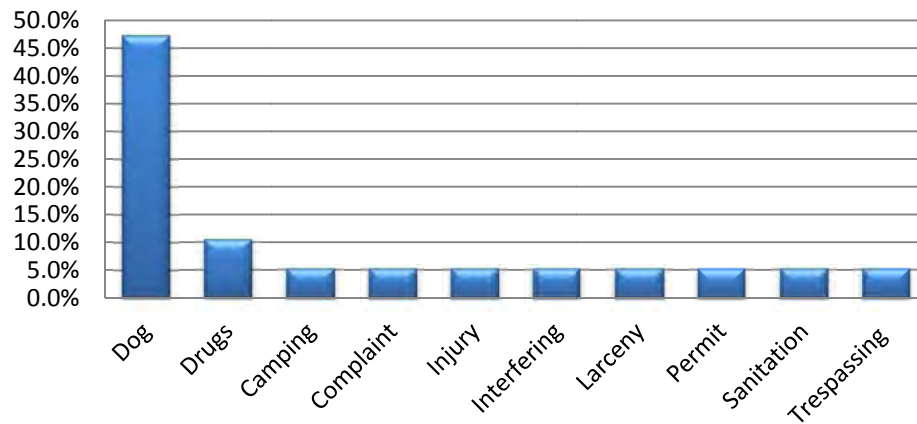
Mori Point Incidents - 2002

2 Total Incidents
NO Dog Incidents



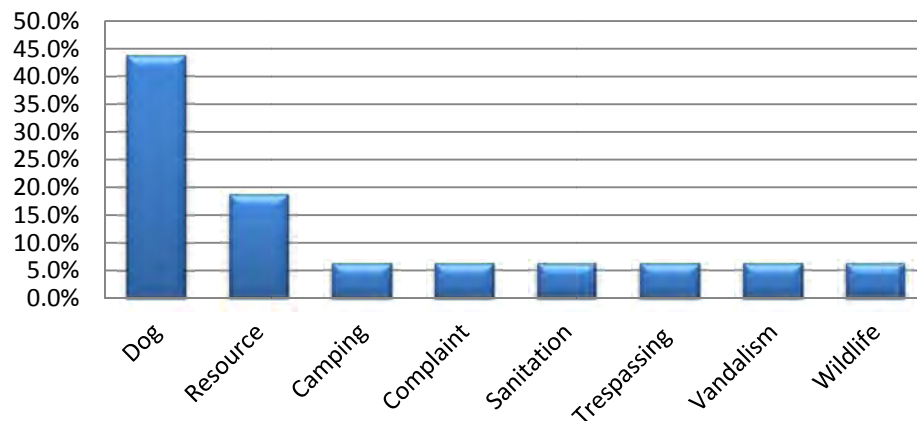
Mori Point Incidents - 2003

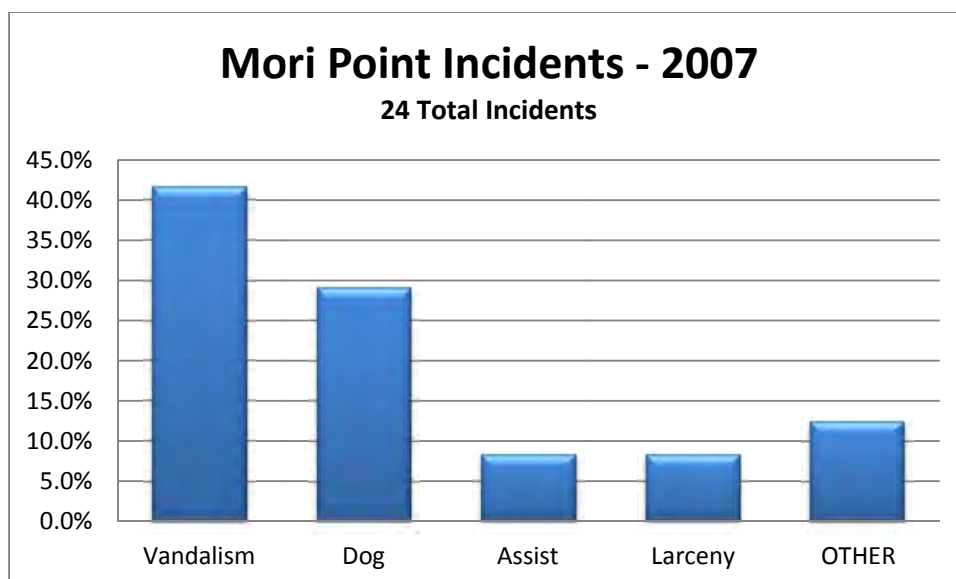
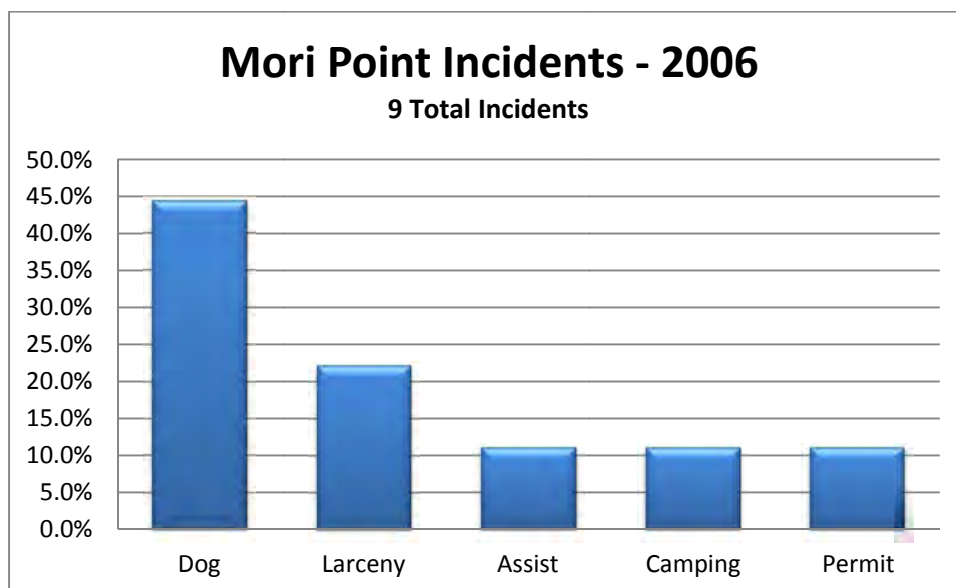
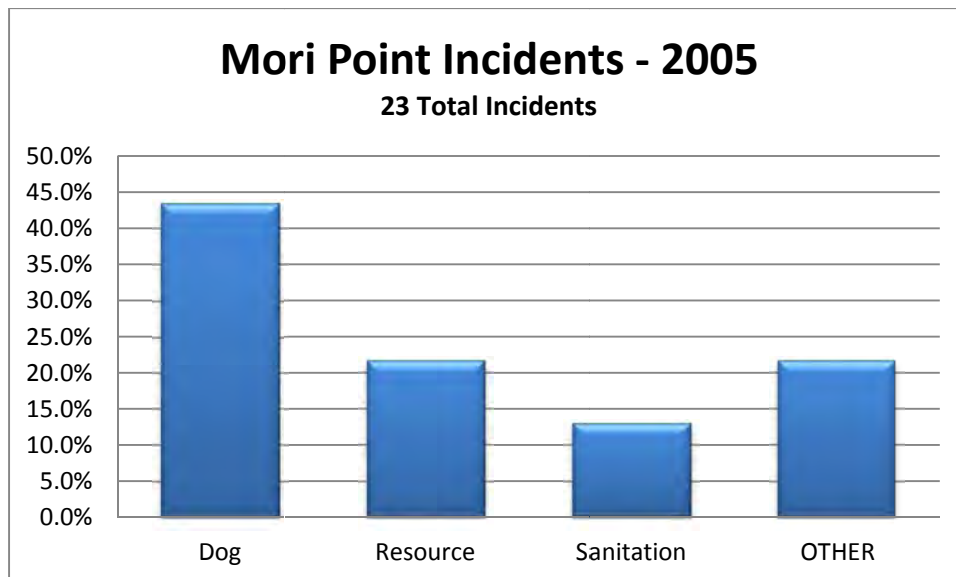
19 Total Incidents



Mori Point Incidents - 2004

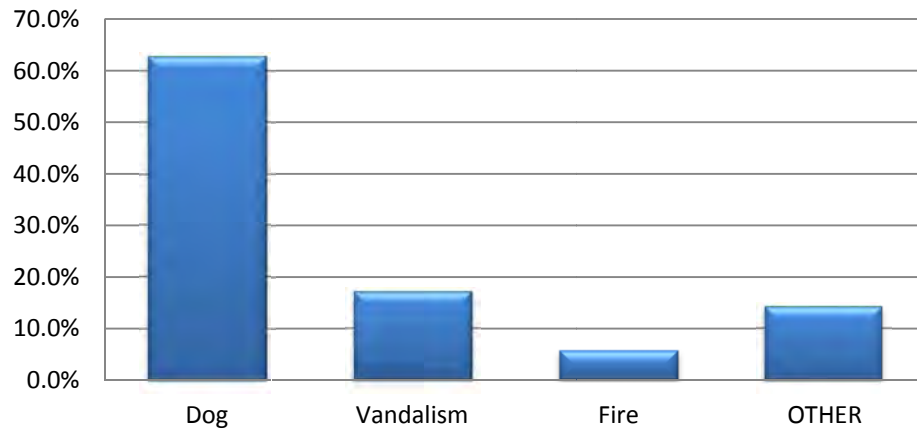
16 Total Incidents





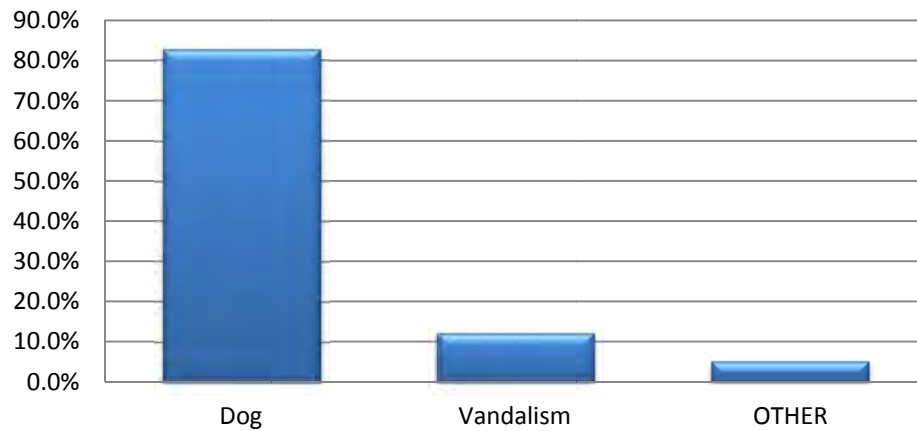
Mori Point Incidents - 2008

35 Total Incidents



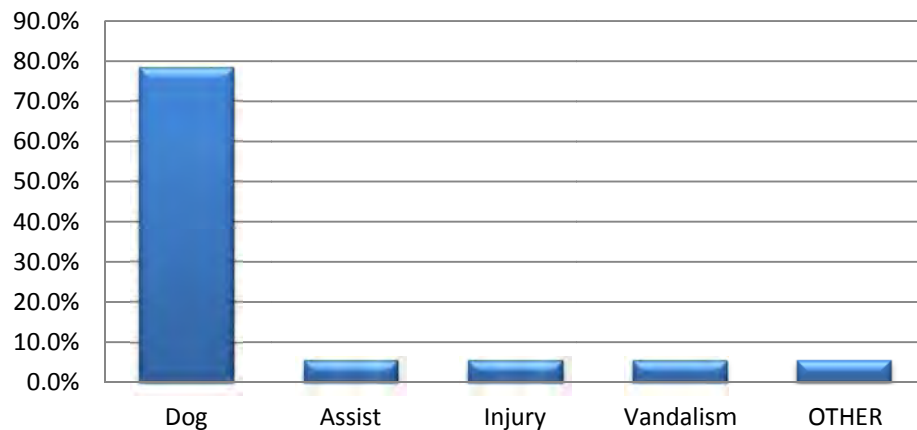
Mori Point Incidents - 2009

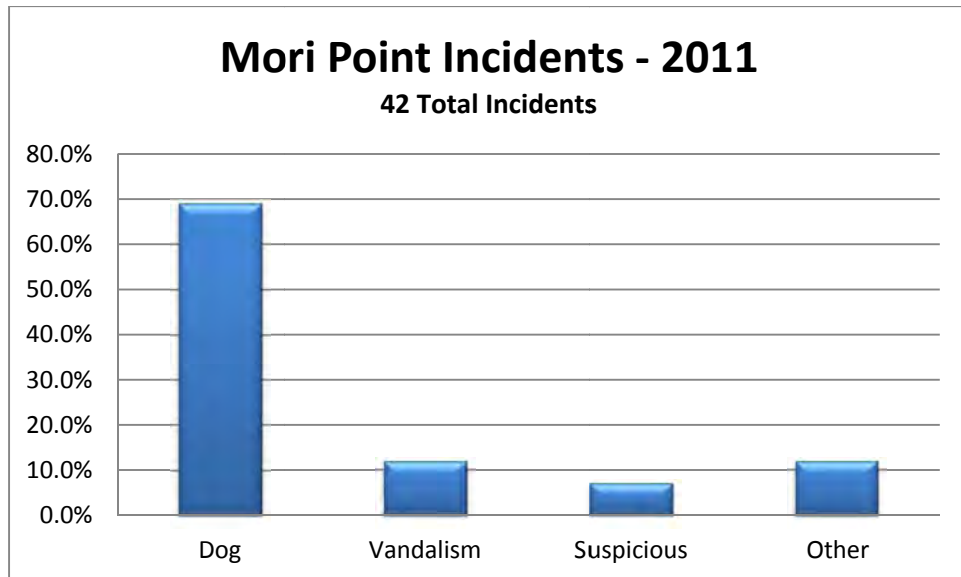
58 Total Incidents



Mori Point Incidents - 2010

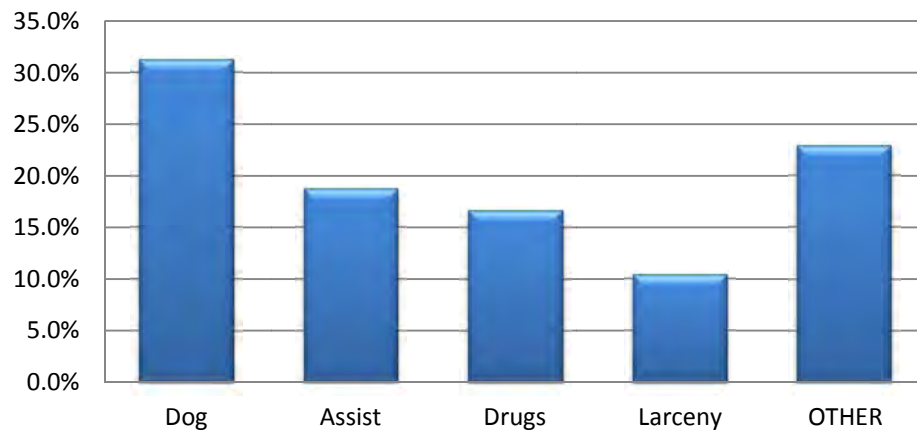
37 Total Incidents





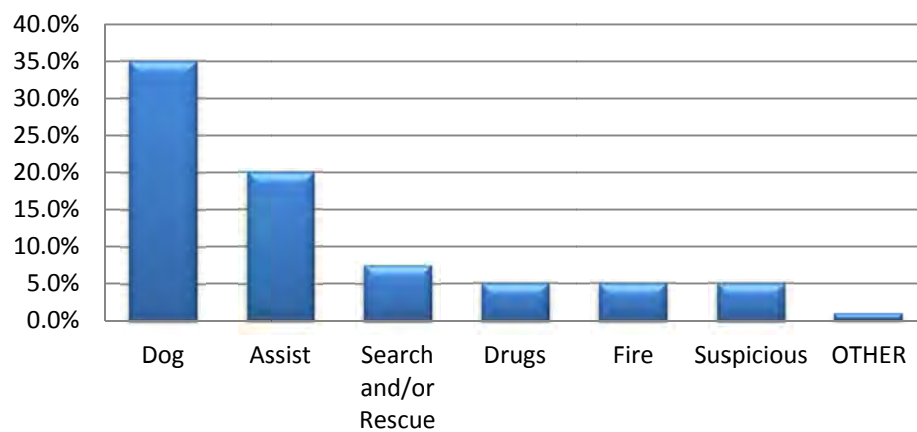
Muir Beach Incidents - 2001

48 Total Incidents



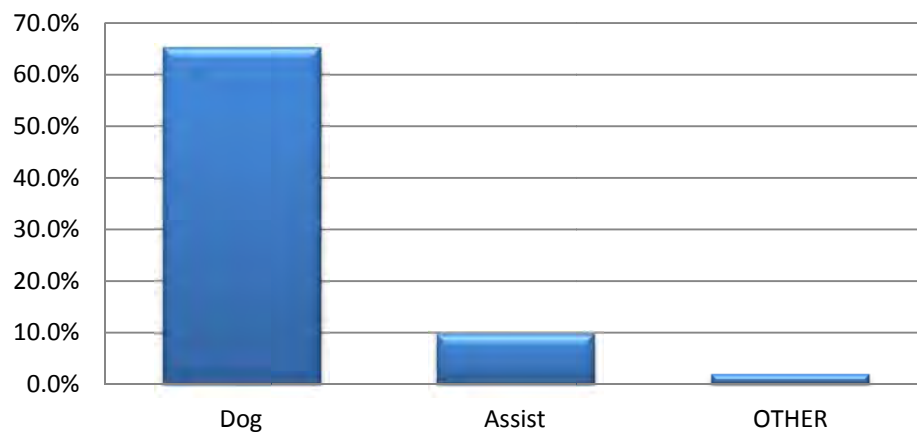
Muir Beach Incidents - 2002

40 Total Incidents



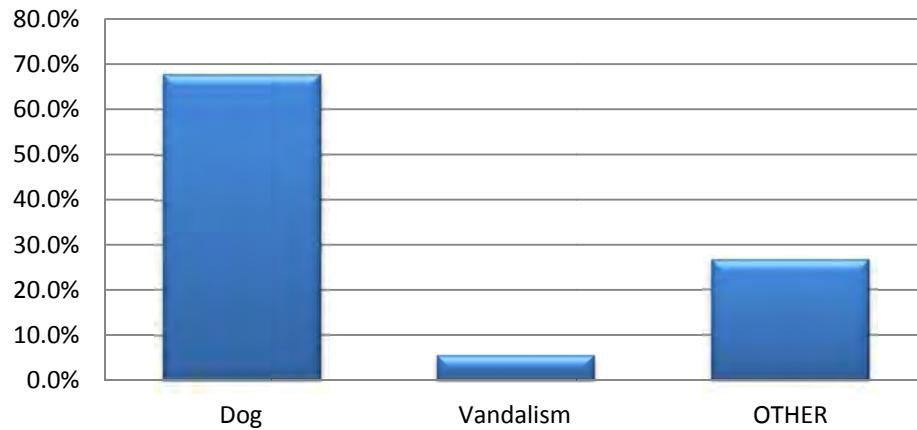
Muir Beach Incidents - 2003

72 Total Incidents



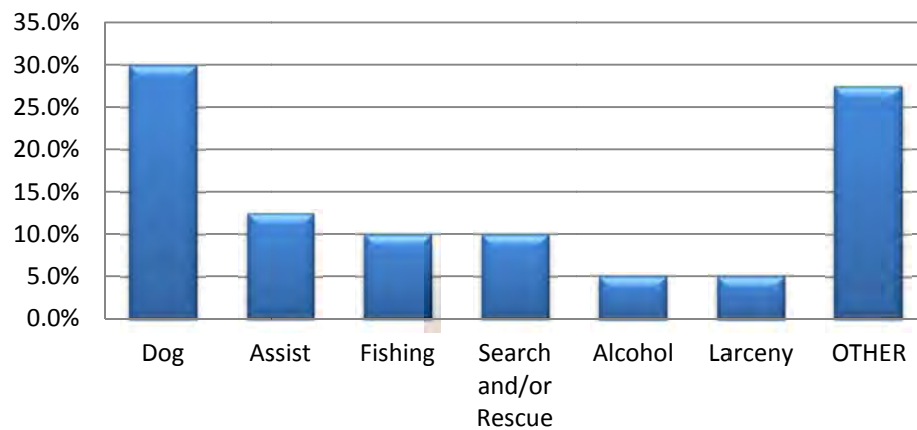
Muir Beach Incidents - 2004

90 Total Incidents



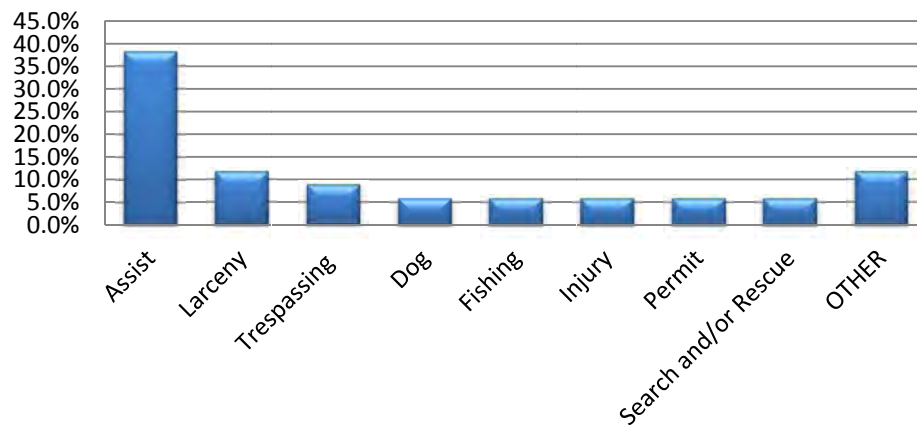
Muir Beach Incidents - 2005

40 Total Incidents



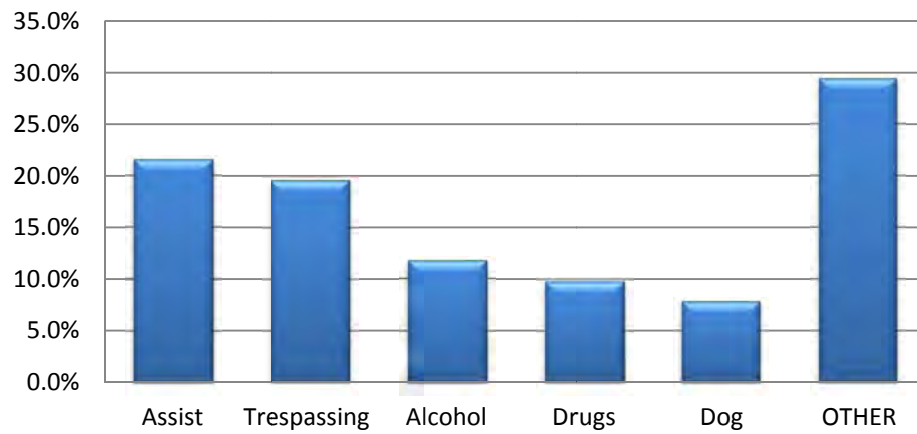
Muir Beach Incidents - 2006

142 Total Incidents



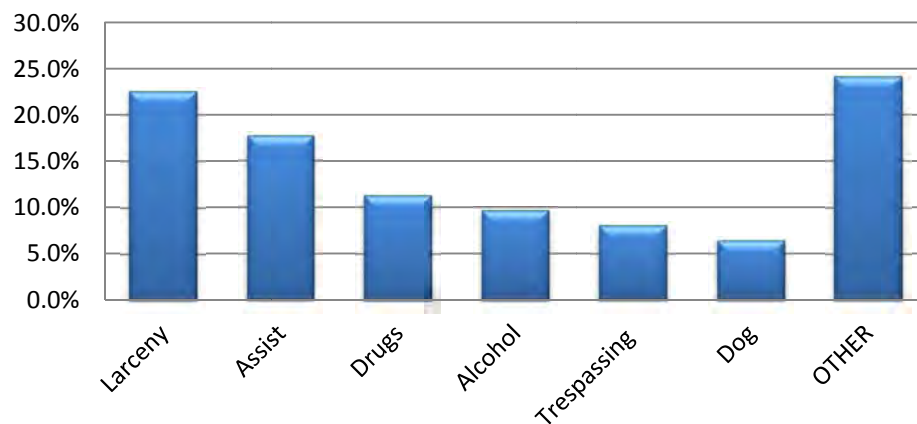
Muir Beach Incidents - 2007

51 Total Incidents



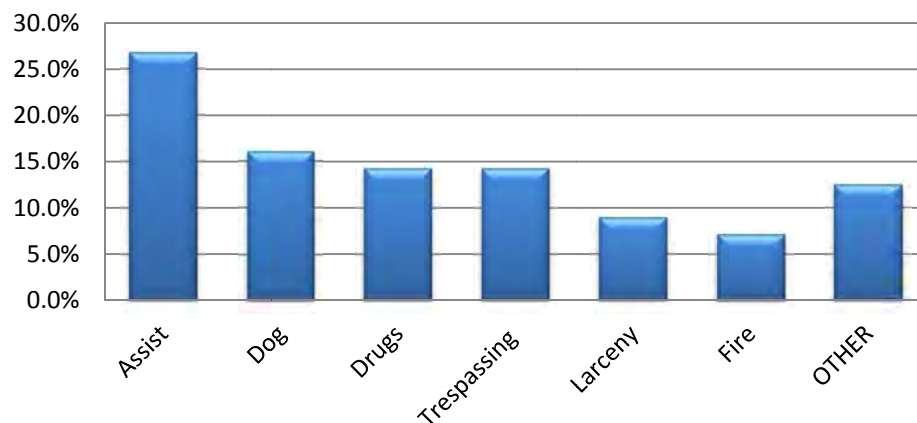
Muir Beach Incidents - 2008

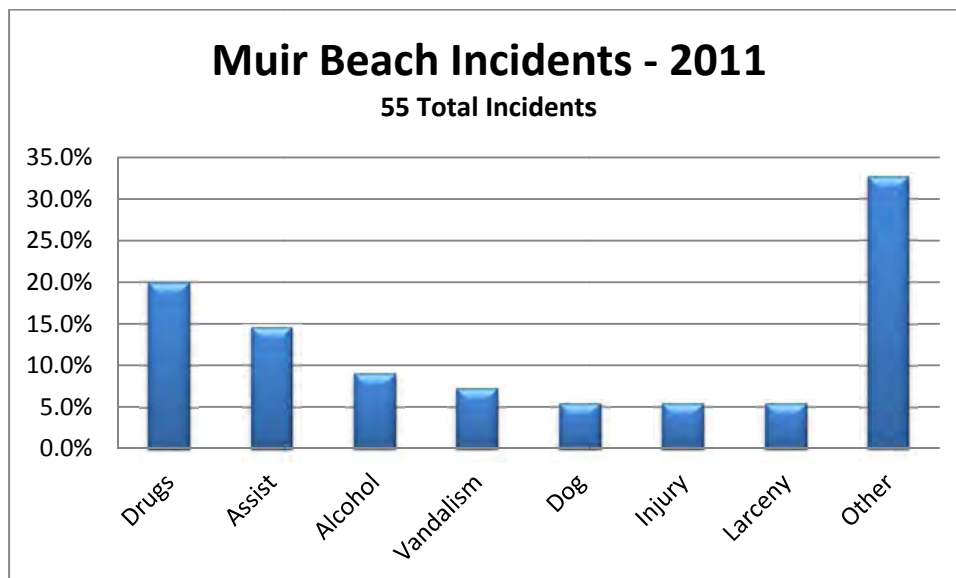
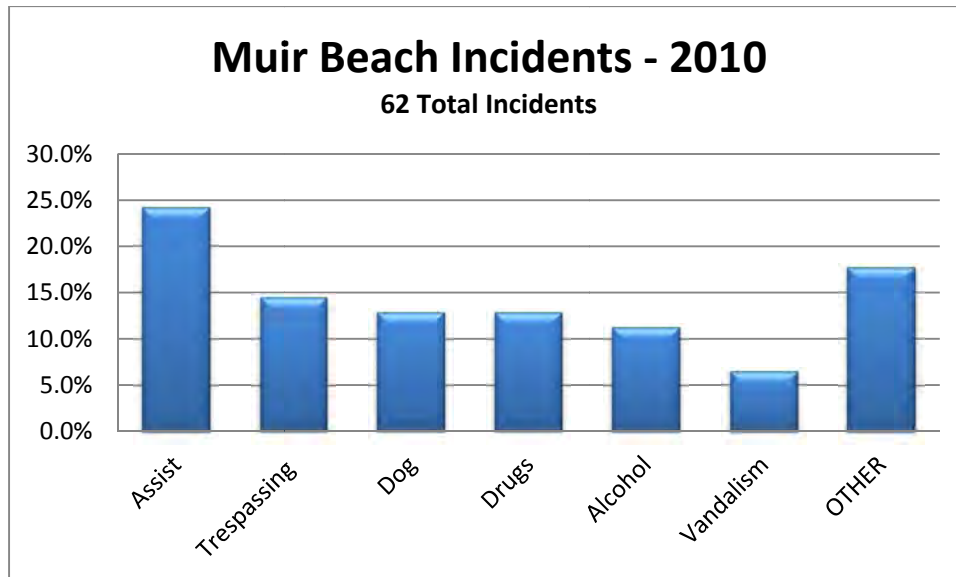
62 Total Incidents



Muir Beach Incidents - 2009

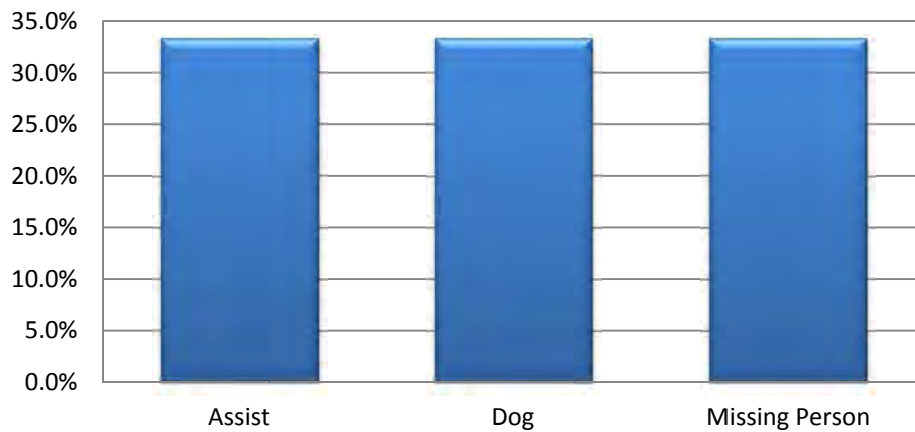
56 Total Incidents





Oakwood Valley Incidents - 2001

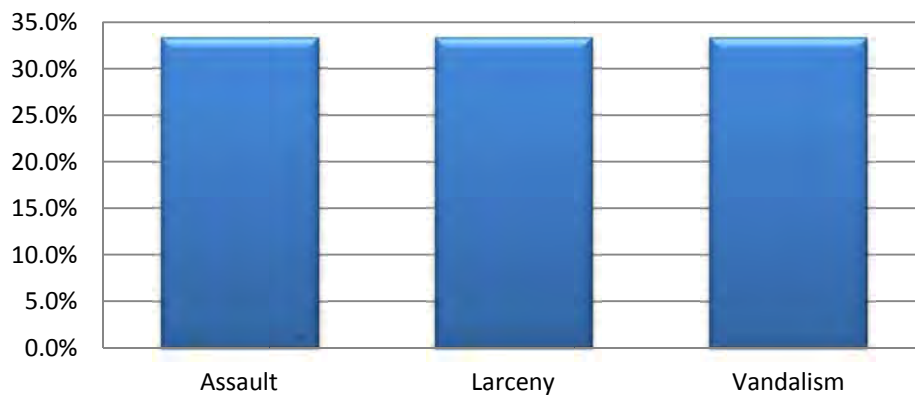
3 Total Incidents



Oakwood Valley Incidents - 2002

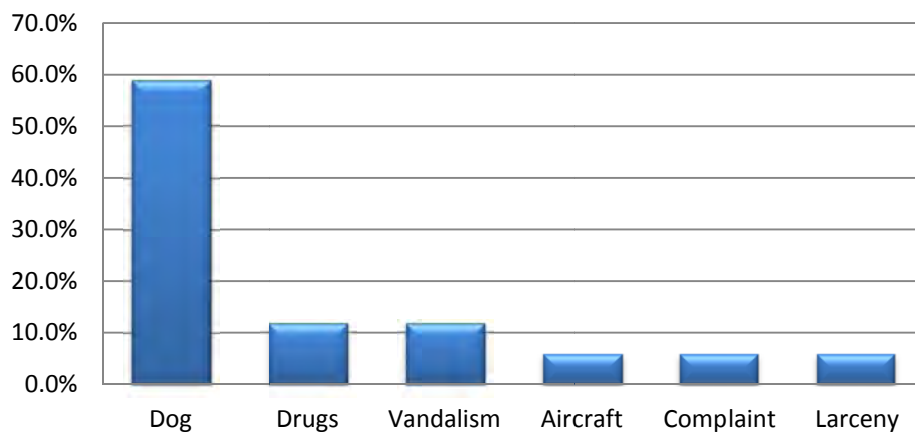
3 Total Incidents

NO Dog Incidents



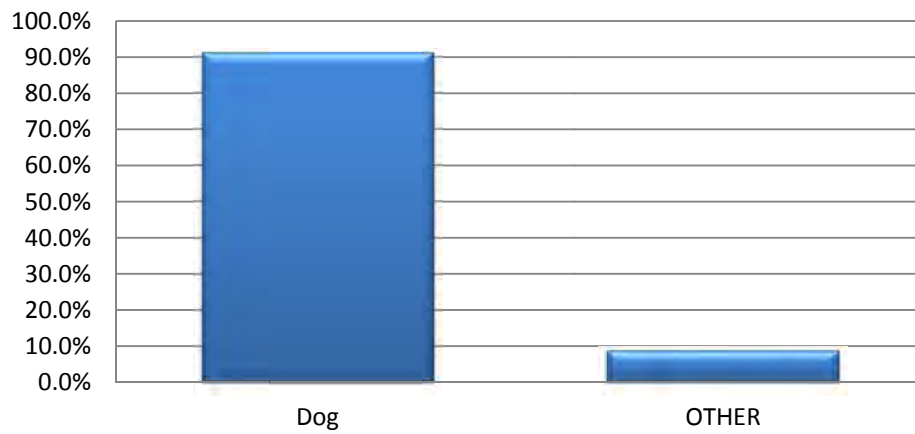
Oakwood Valley Incidents - 2003

17 Total Incidents



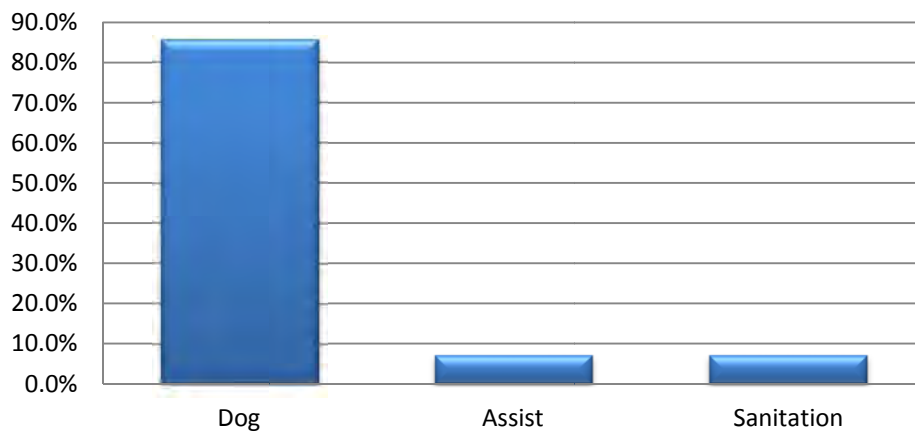
Oakwood Valley Incidents - 2004

46 Total Incidents



Oakwood Valley Incidents - 2005

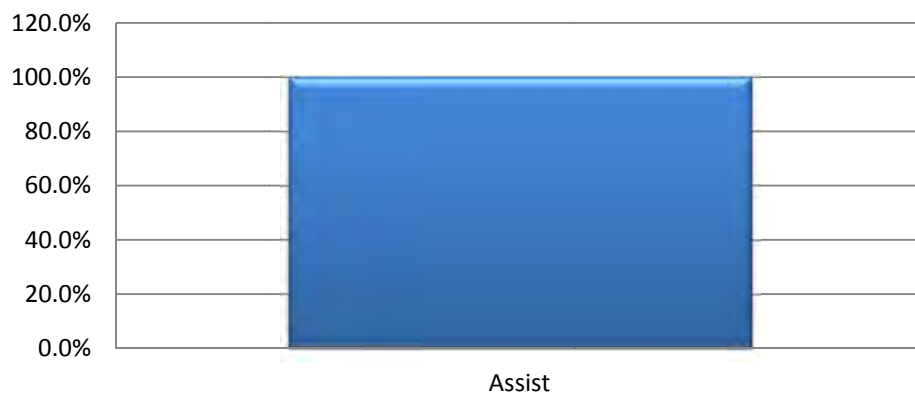
14 Total Incidents



Oakwood Valley Incidents - 2006

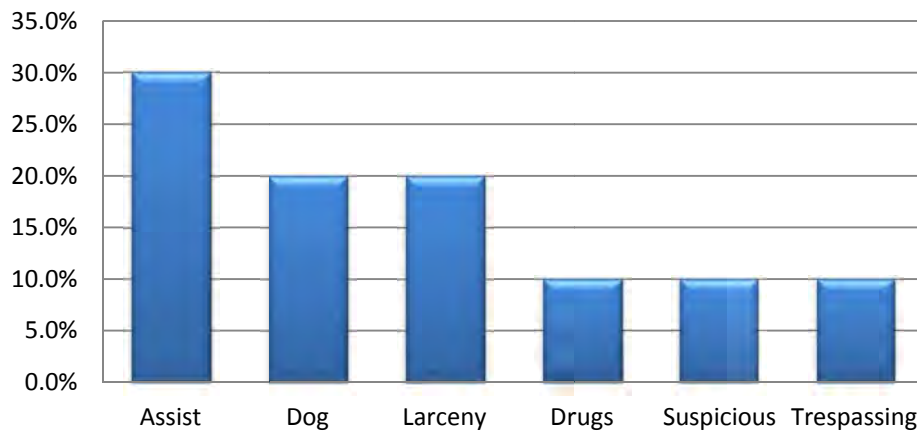
1 Total Incident

NO Dog Incidents



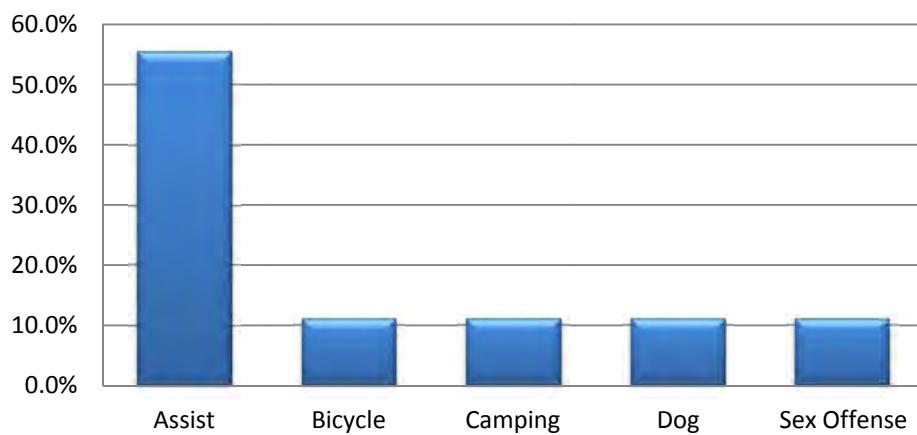
Oakwood Valley Incidents - 2007

10 Total Incidents



Oakwood Valley Incidents - 2008

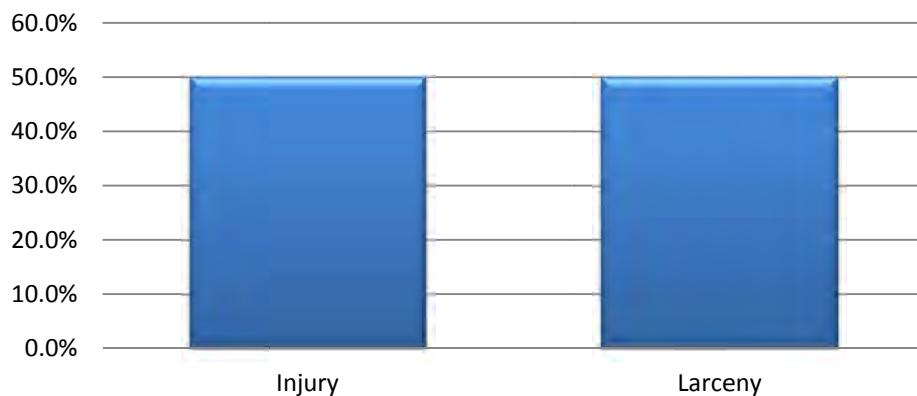
9 Total Incidents



Oakwood Valley Incidents - 2009

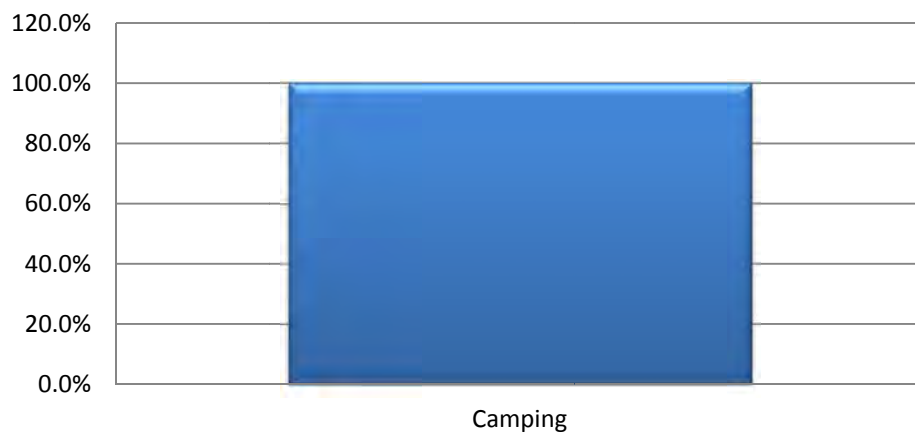
2 Total Incidents

NO Dog Incidents



Oakwood Valley Incidents - 2010

1 Total Incident



Oakwood Valley Incidents - 2011

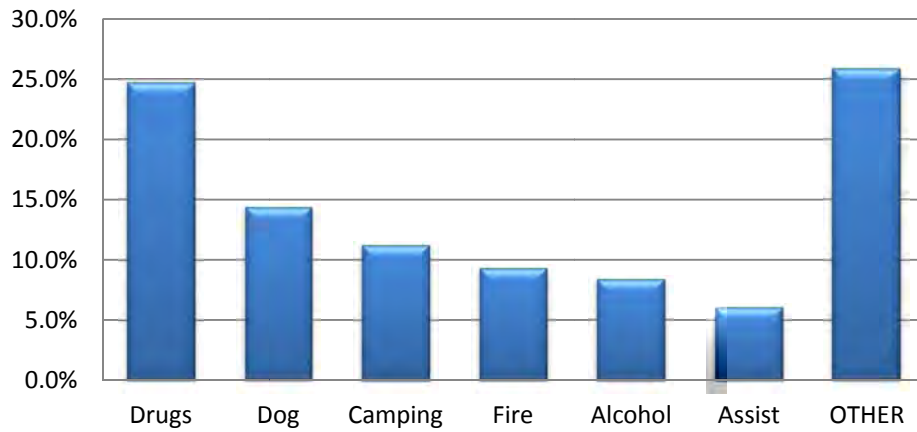
1 Total Incident

NO Dog Incidents



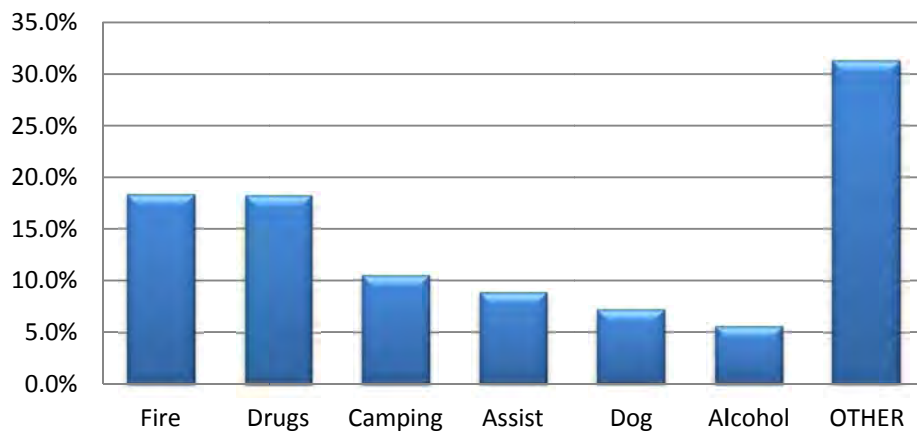
Ocean Beach Incidents - 2001

954 Total Incidents



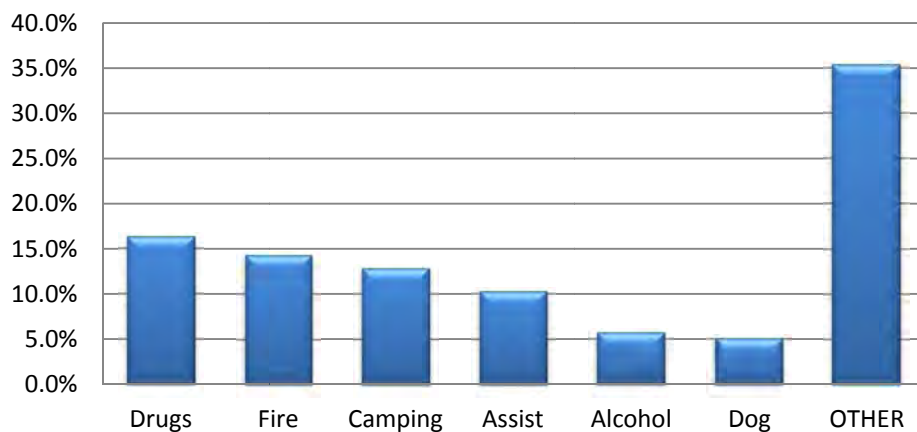
Ocean Beach Incidents - 2002

916 Total Incidents



Ocean Beach Incidents - 2003

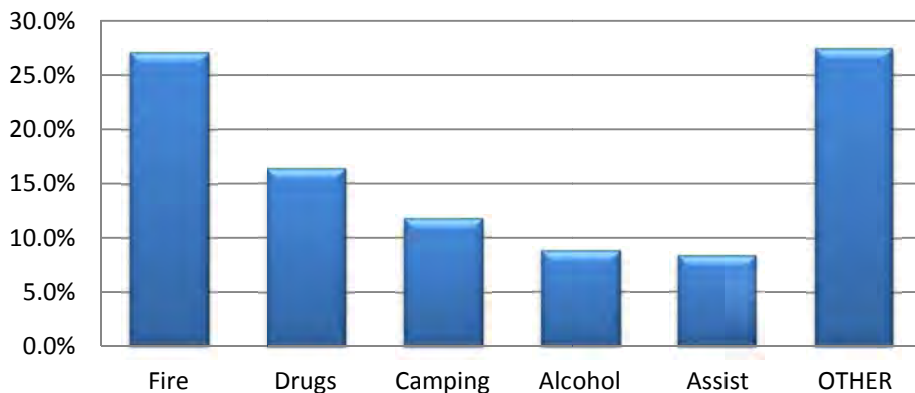
943 Total Incidents



Ocean Beach Incidents - 2004

1280 Total Incidents

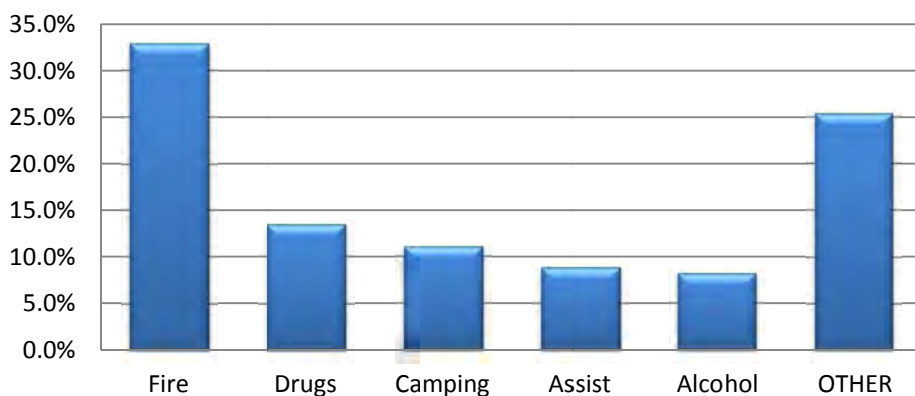
Dog Incidents Included in "Other" = 4.5%



Ocean Beach Incidents - 2005

1424 Total Incidents

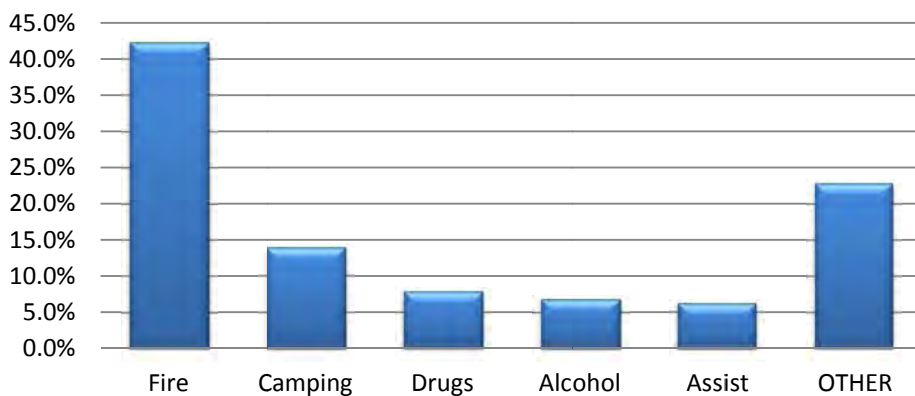
Dog Incidents Included in "Other" = 2.8%



Ocean Beach Incidents - 2006

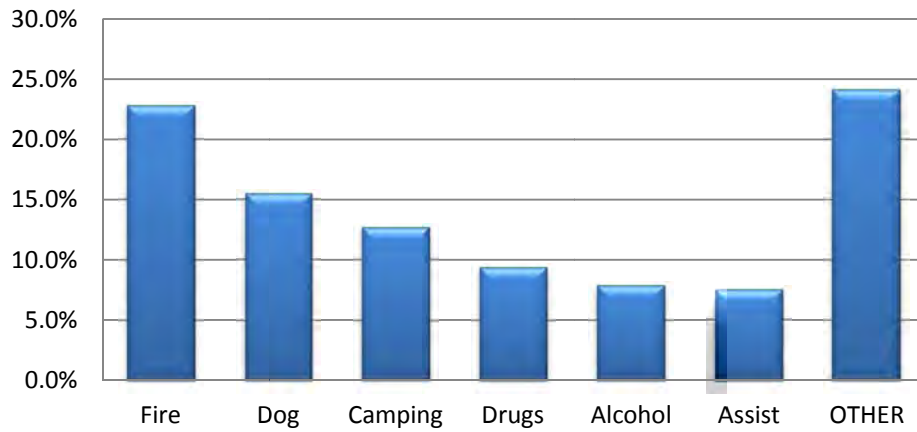
1273 total incidents

Dog Incidents Included in "Other" = 2.0%



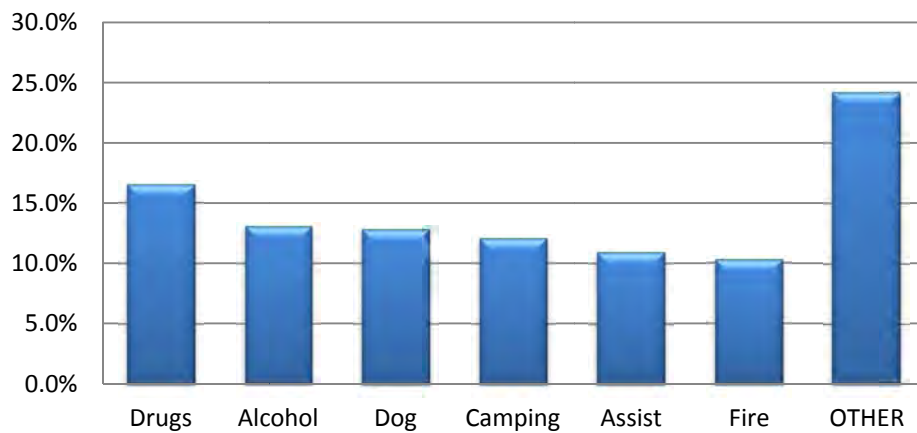
Ocean Beach Incidents - 2007

1329 Total Incidents



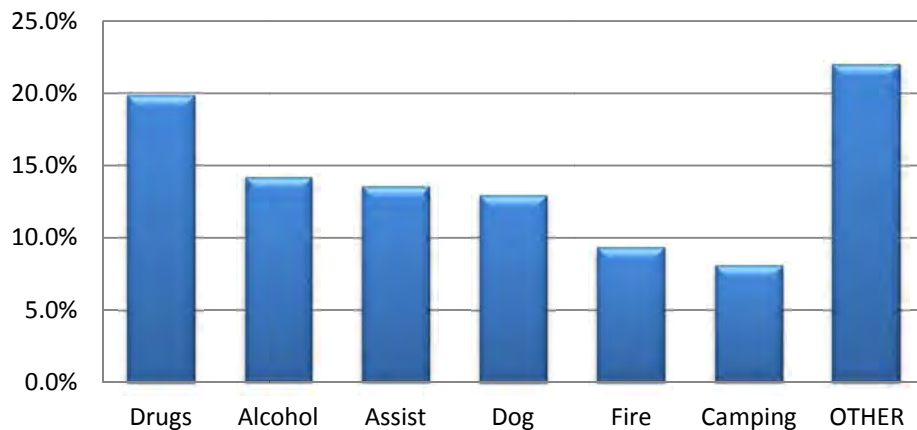
Ocean Beach Incidents - 2008

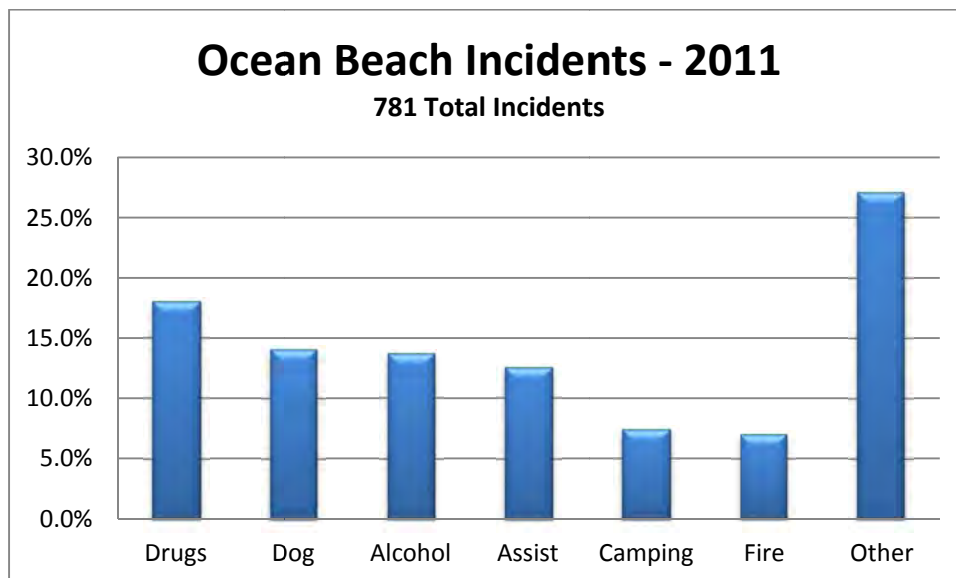
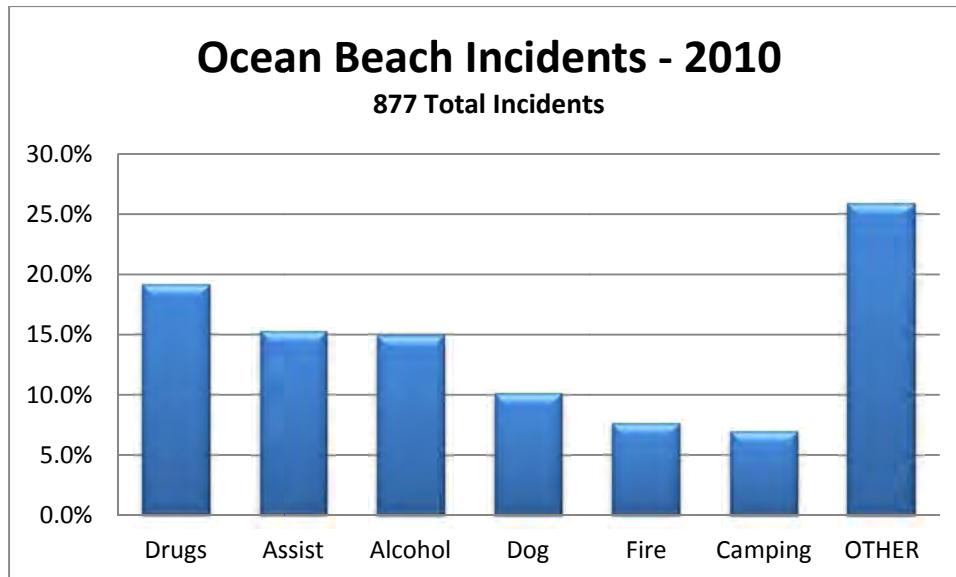
1077 Total Incidents



Ocean Beach Incidents - 2009

1113 Total Incidents

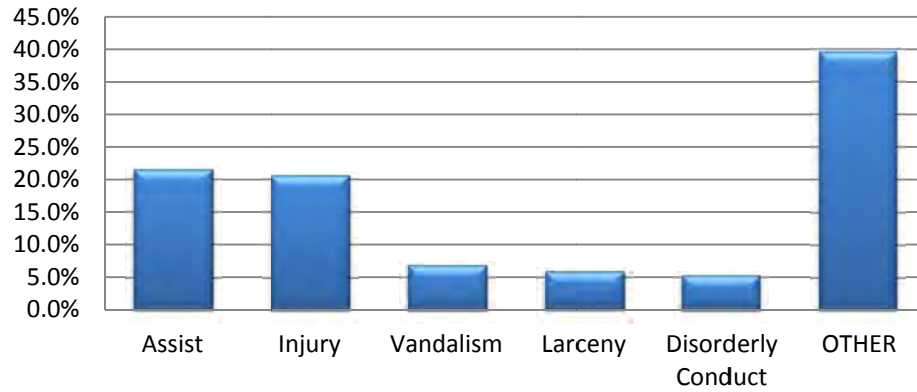




Other Area Incidents - 2001

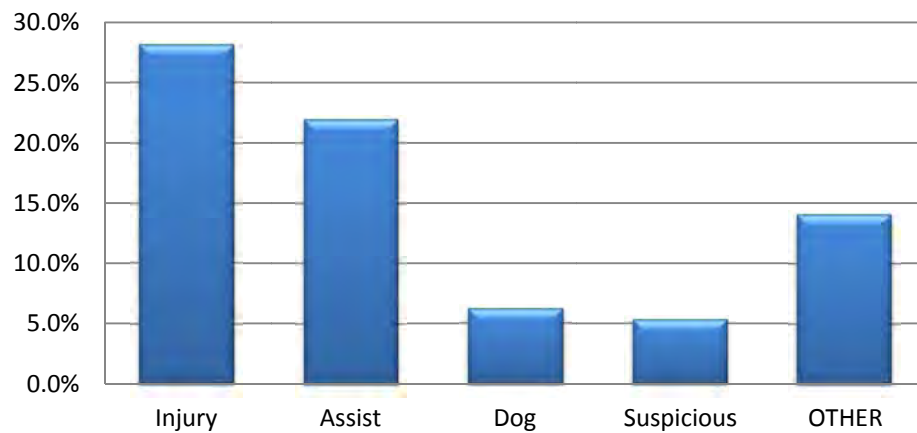
320 Total Incidents

Dog Incidents Included in "Other" = 4.7%



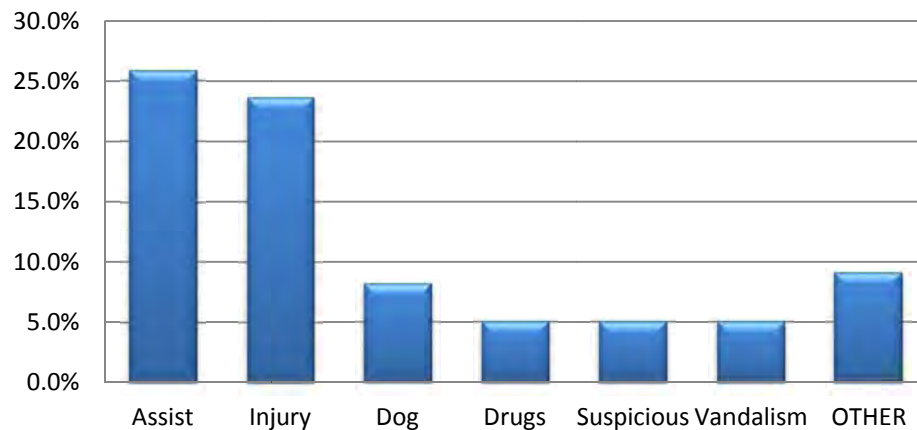
Other Area Incidents - 2002

337 Total Incidents



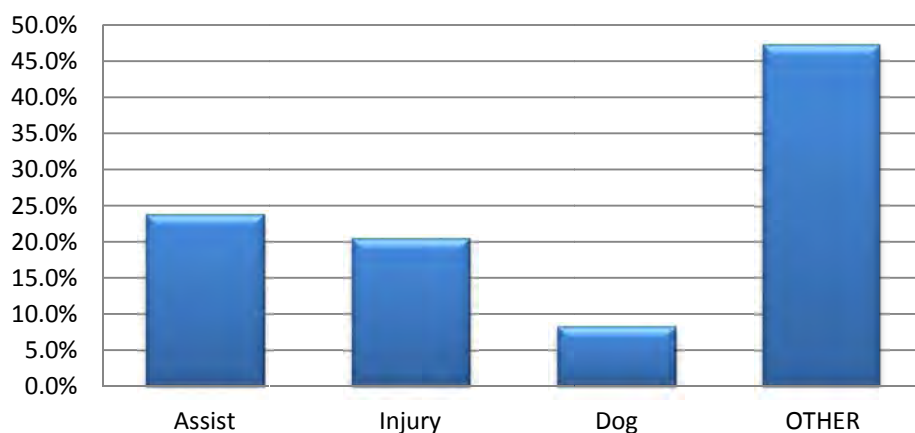
Other Area Incidents - 2003

317 Total Incidents



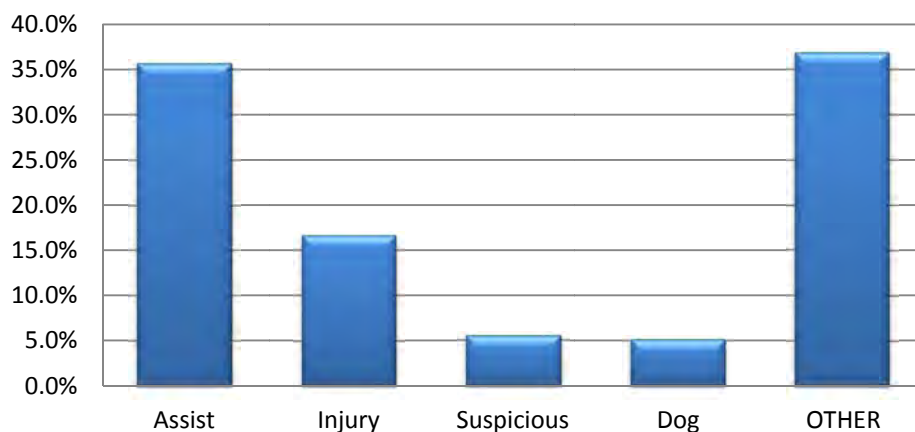
Other Area Incidents - 2004

336 Total Incidents



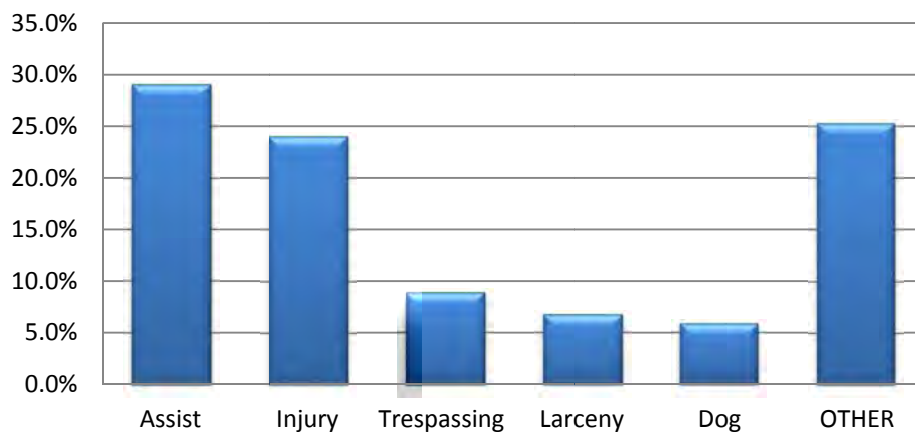
Other Area Incidents - 2005

252 Total Incidents



Other Area Incidents - 2006

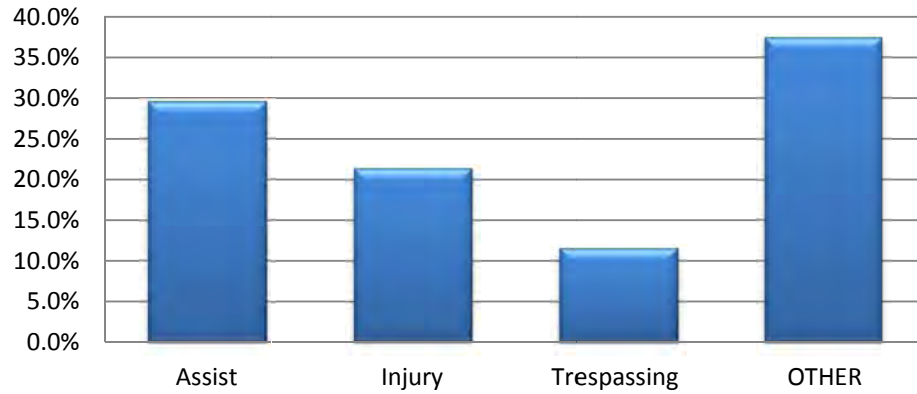
237 Total Incidents



Other Area Incidents - 2007

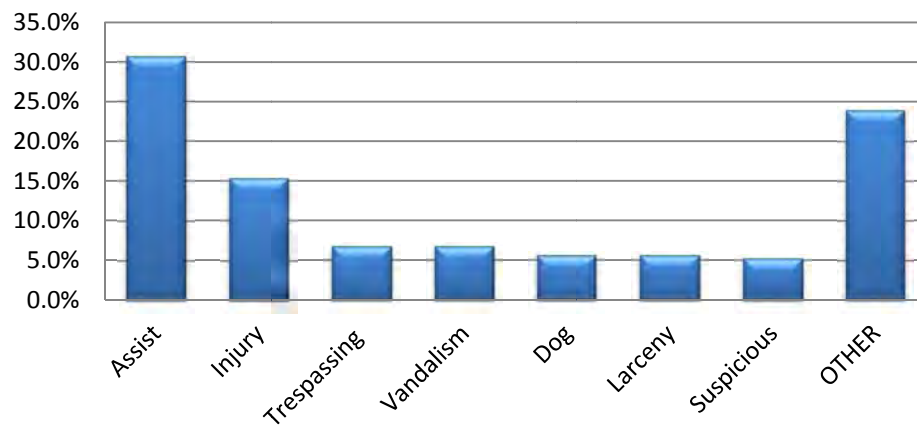
355 Total Incidents

Dog Incidents Included in "Other" = 4.5%



Other Area Incidents - 2008

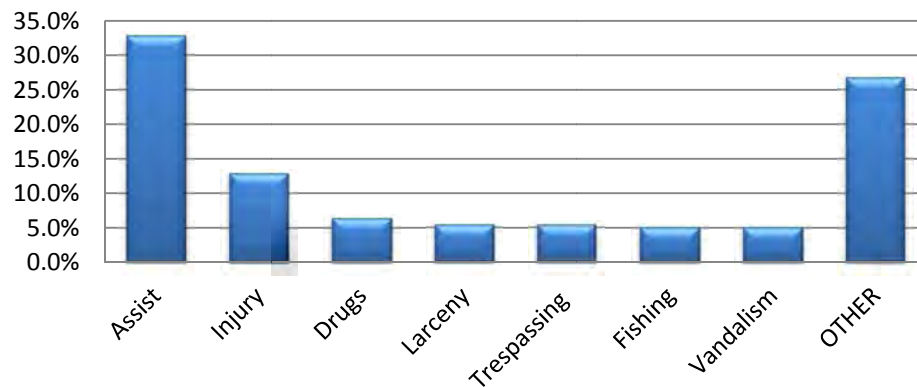
267 Total Incidents



Other Area Incidents - 2009

295 Total Incidents

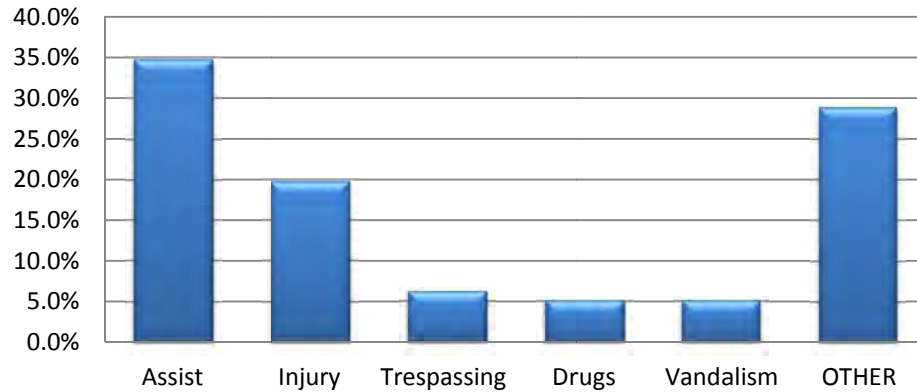
Dog Incidents Included in "Other" = 4.4%



Other Area Incidents - 2010

273 Total Incidents

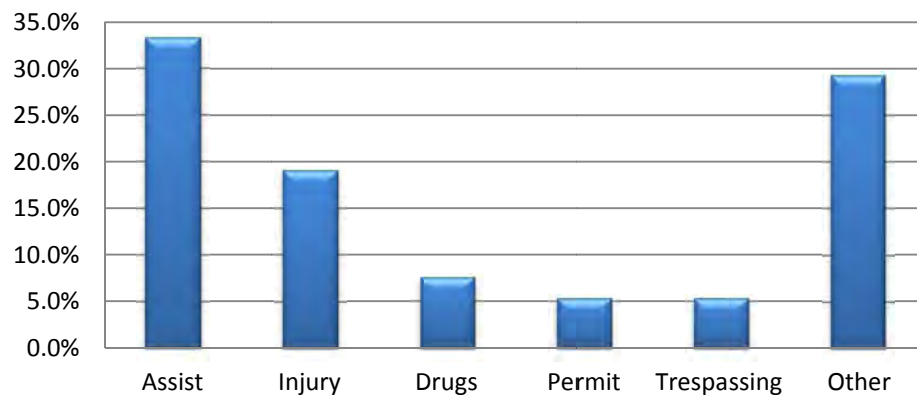
Dog Incidents Included in "Other" = 4.0%



Other Area Incidents - 2011

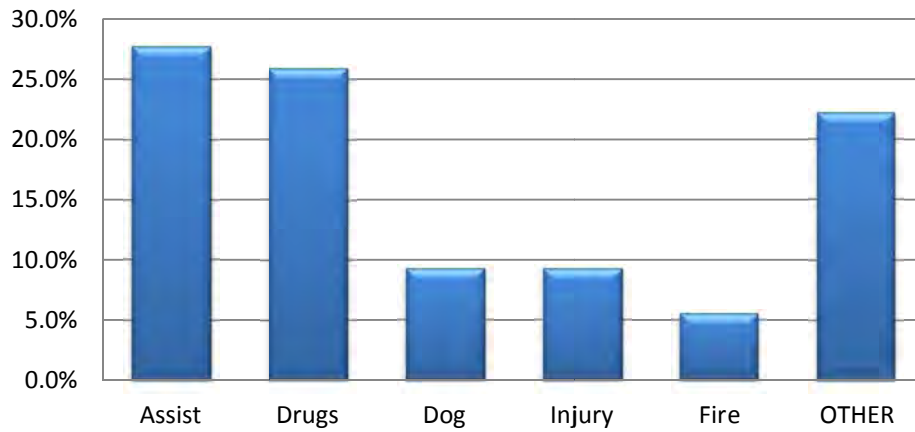
225 Total Incidents

Dog Incidents Included in "Other" = 3.6%



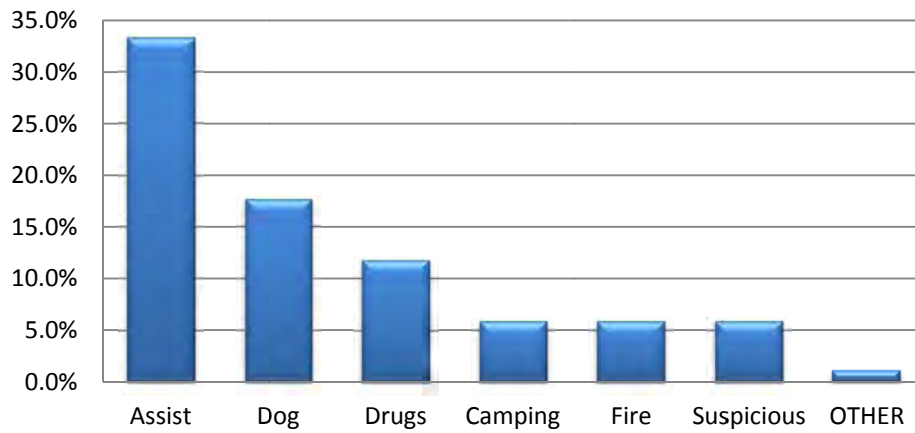
Rodeo Beach Incidents - 2001

54 Total Incidents



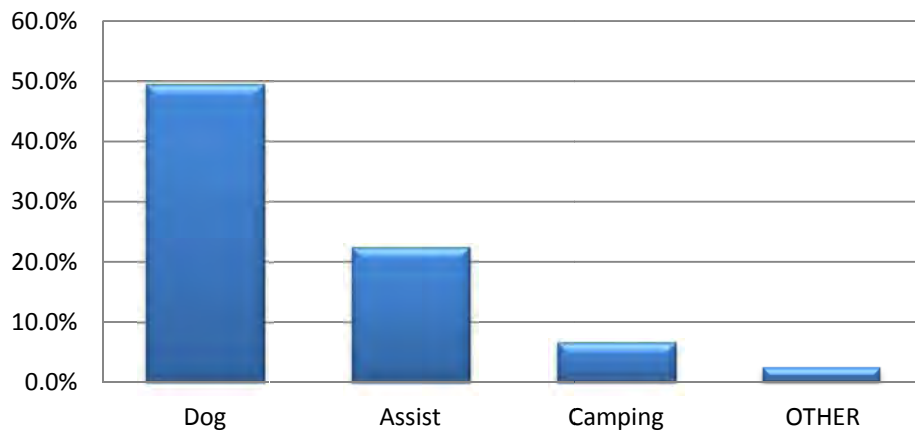
Rodeo Beach Incidents - 2002

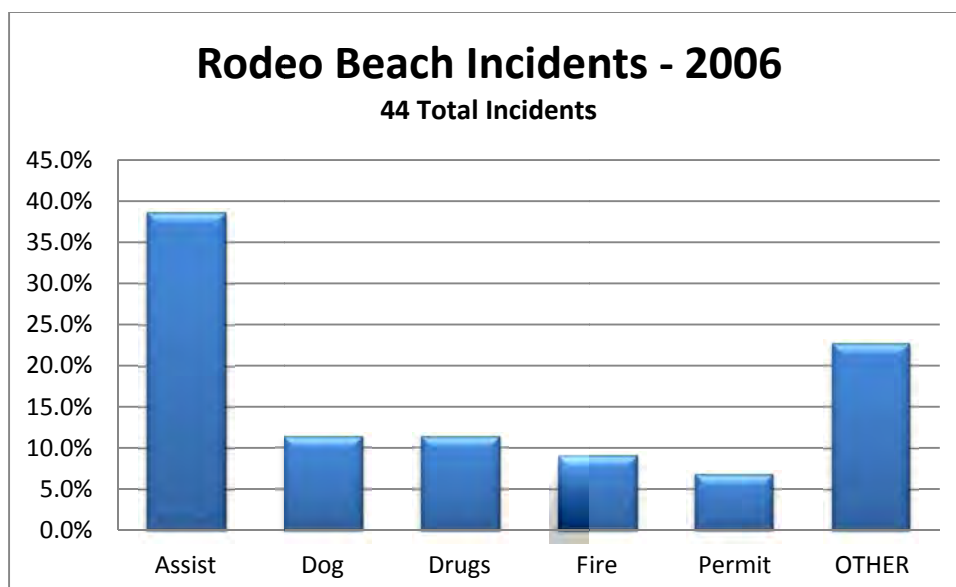
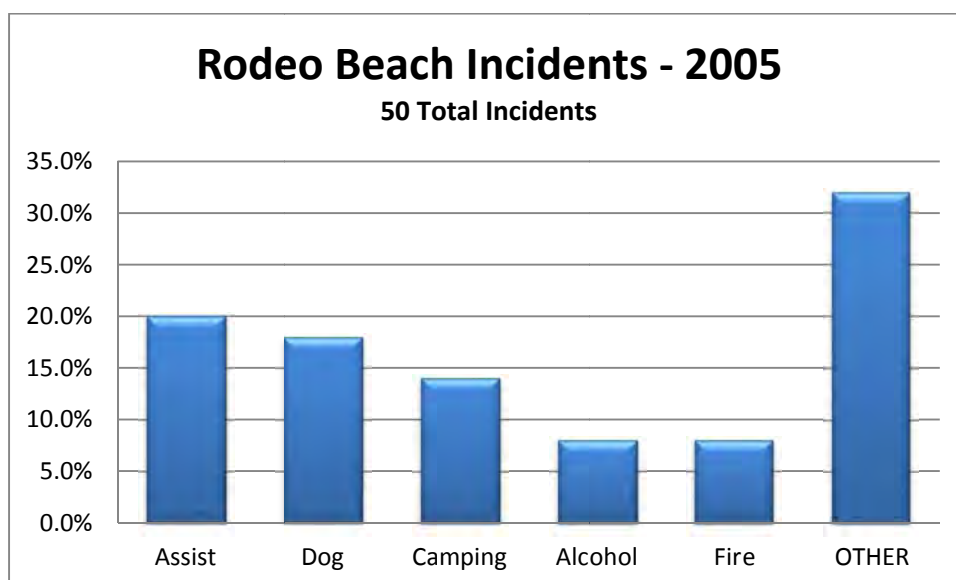
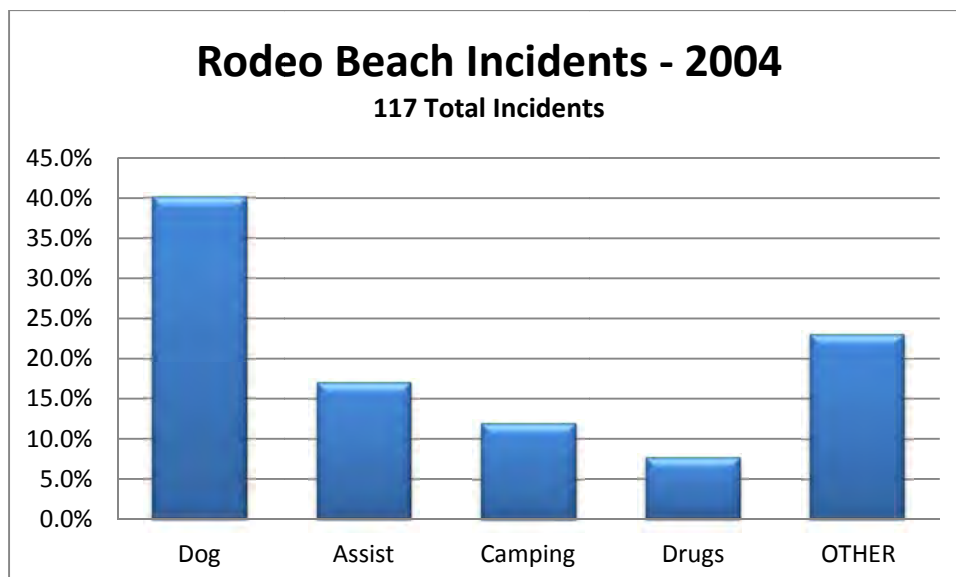
51 Total Incidents



Rodeo Beach Incidents - 2003

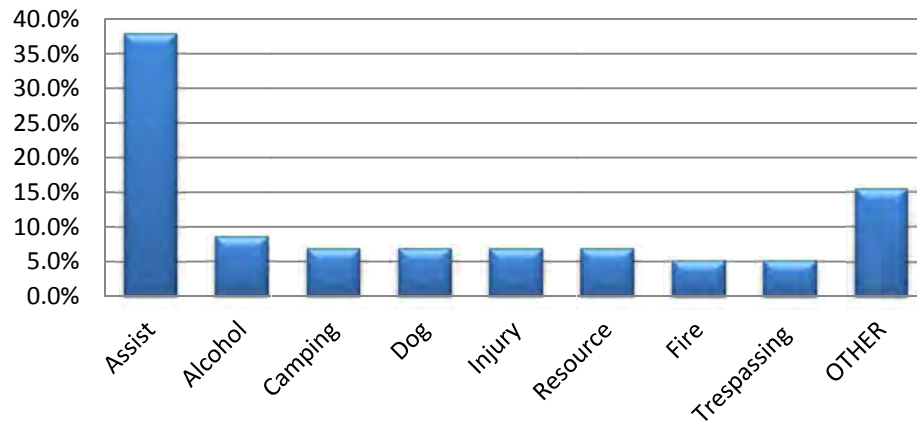
107 Total Incidents





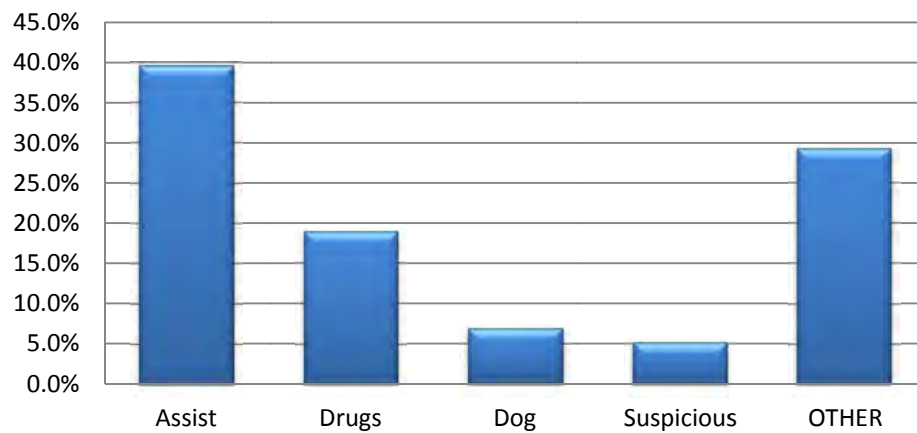
Rodeo Beach Incidents - 2007

58 Total Incidents



Rodeo Beach Incidents - 2008

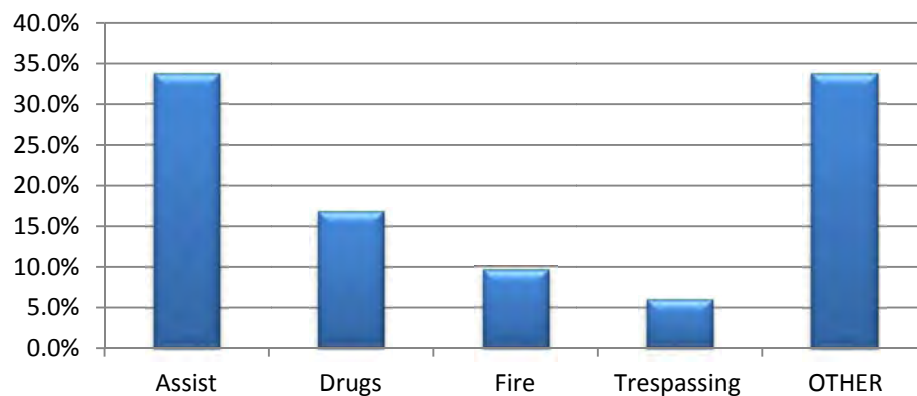
58 Total Incidents

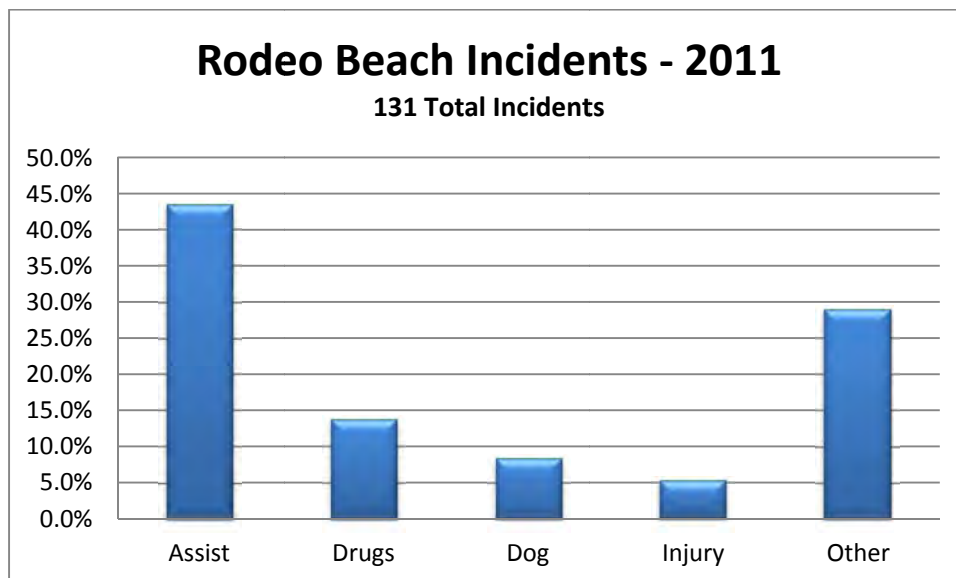
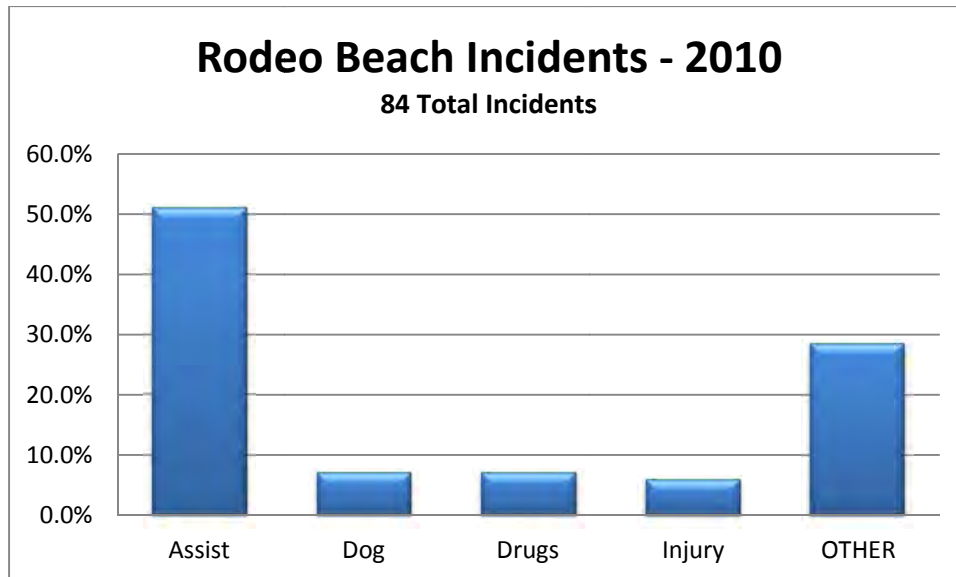


Rodeo Beach Incidents - 2009

83 Total Incidents

Dog Incidents Included in "Other" = 4.8%

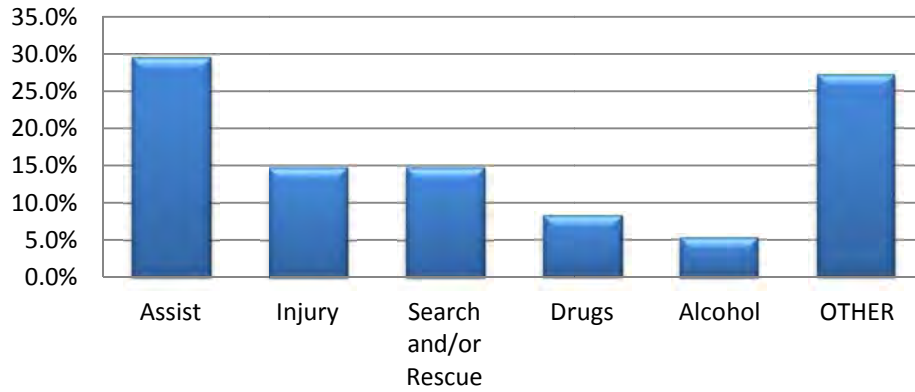




Stinson Beach Incidents - 2001

169 Total Incidents

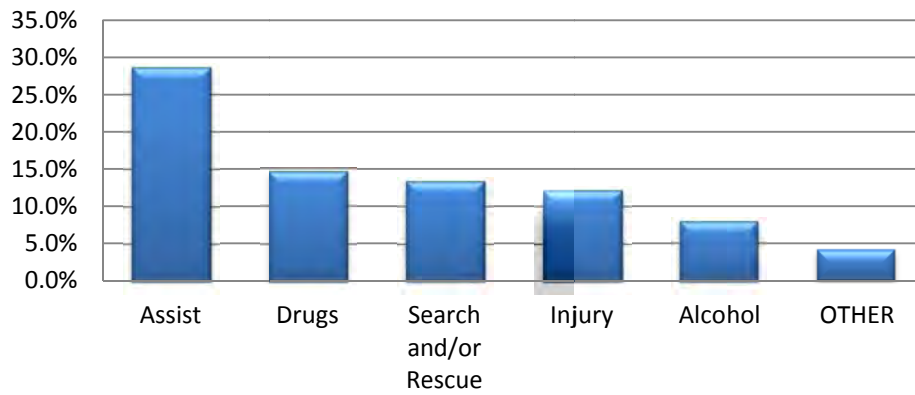
Dog Incidents Included in "Other" = 1.8%



Stinson Beach Incidents - 2002

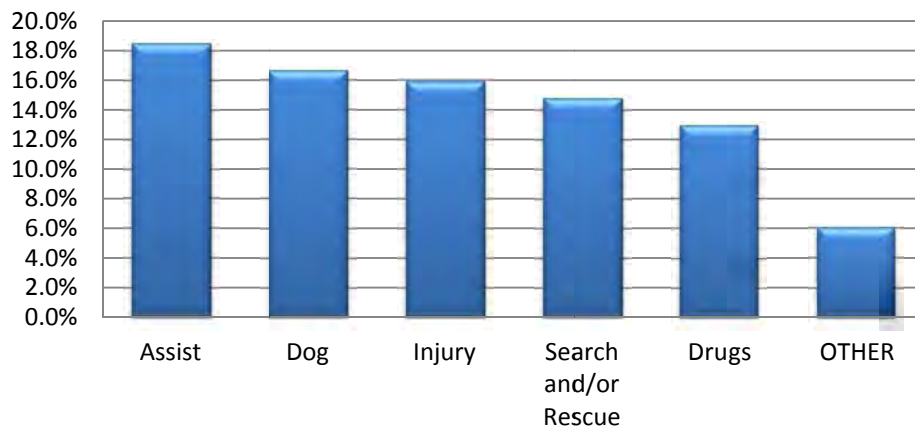
164 Total Incidents

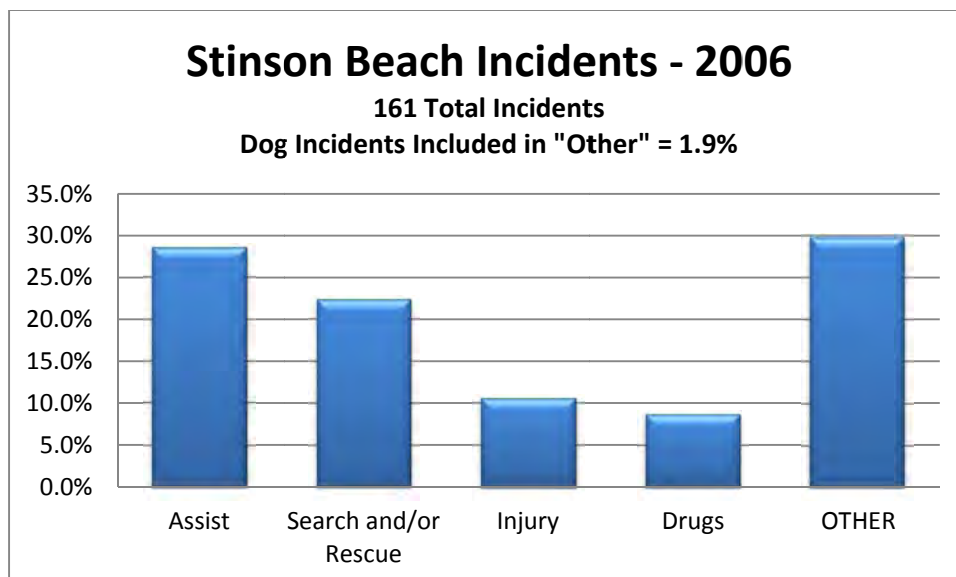
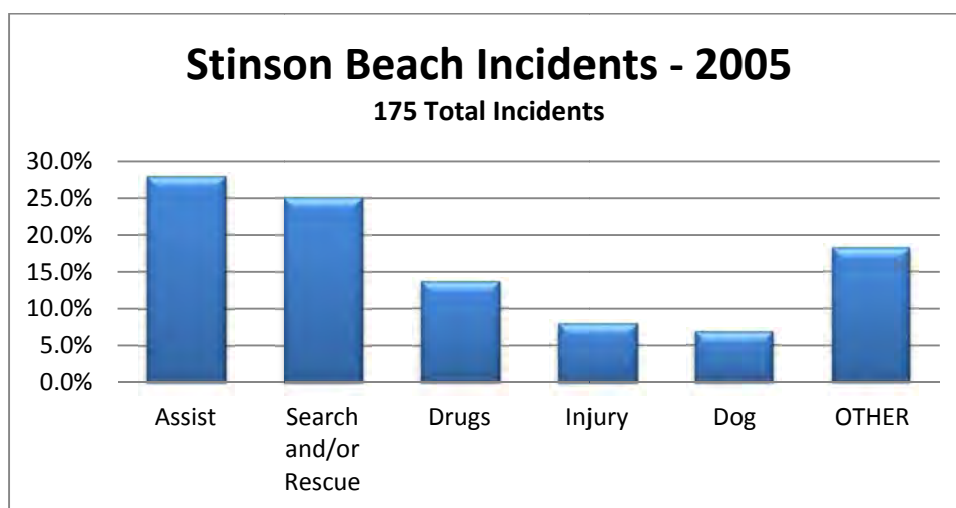
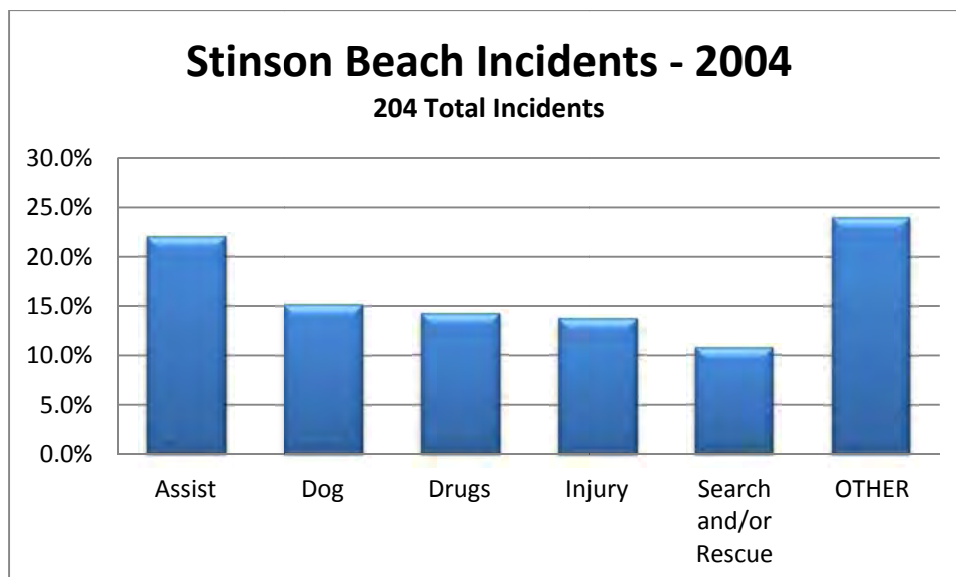
Dog Incidents Included in "Other" = 4.9%



Stinson Beach Incidents - 2003

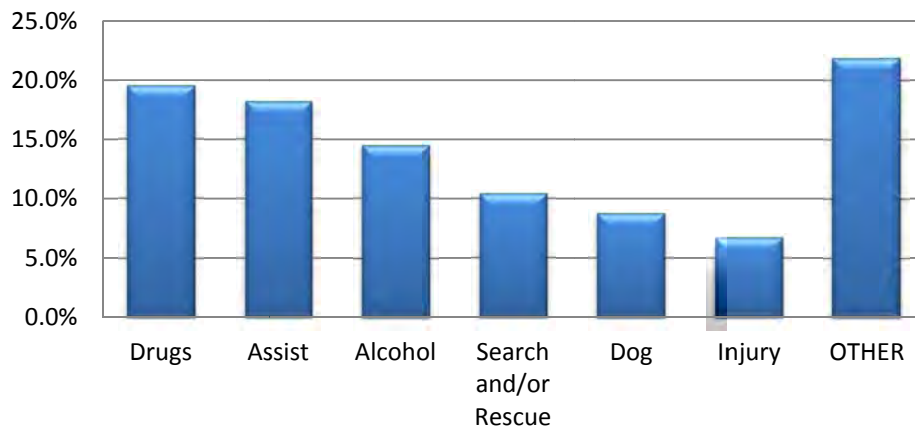
270 Total Incidents





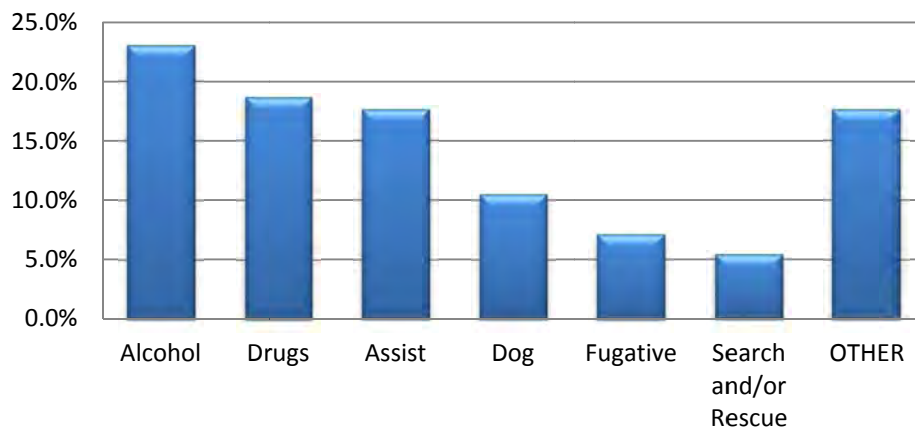
Stinson Beach Incidents - 2007

297 Total Incidents



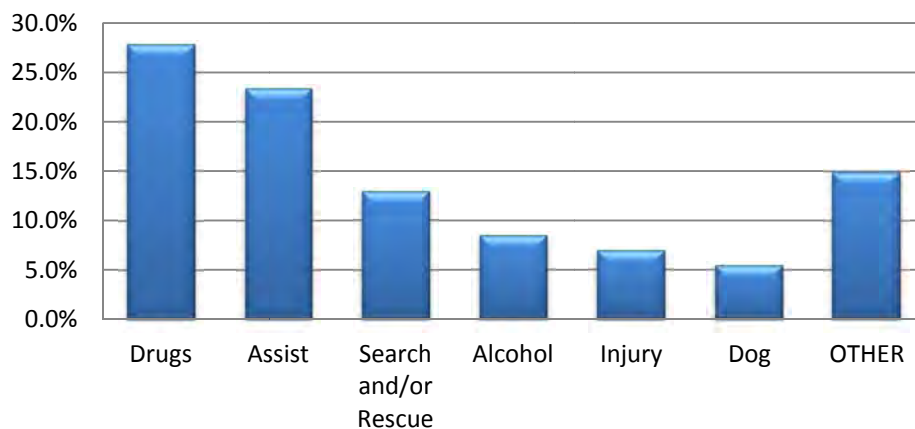
Stinson Beach Incidents - 2008

295 Total Incidents



Stinson Beach Incidents - 2009

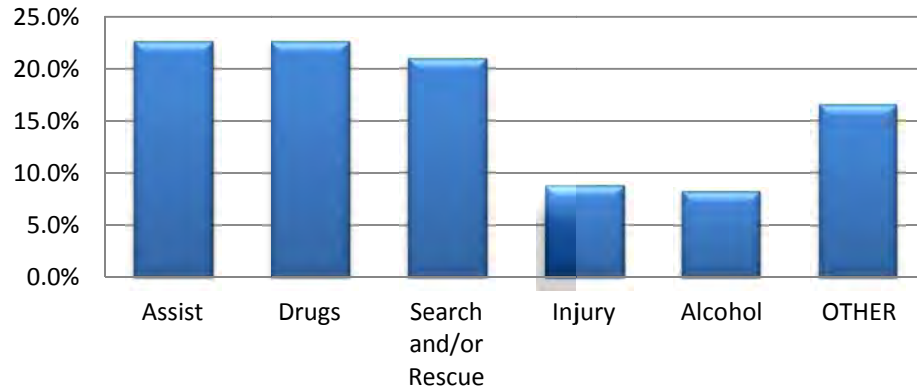
201 Total Incidents



Stinson Beach Incidents - 2010

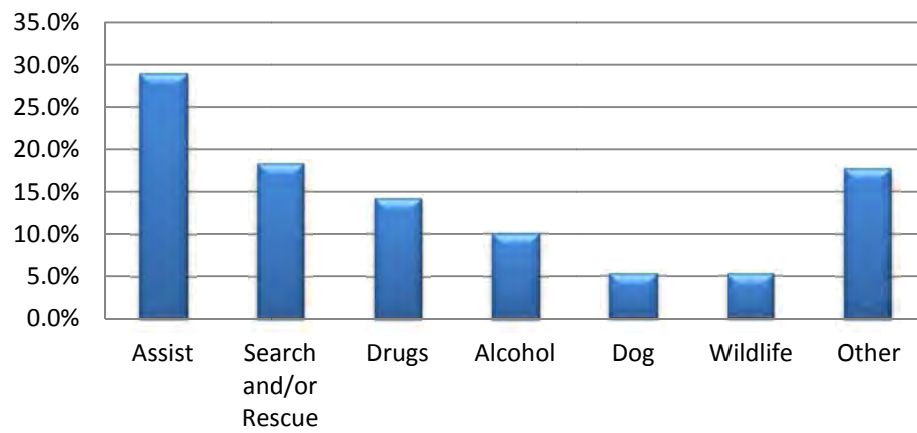
181 Total Incidents

Dog Incidents Included in "Other" = 3.3%



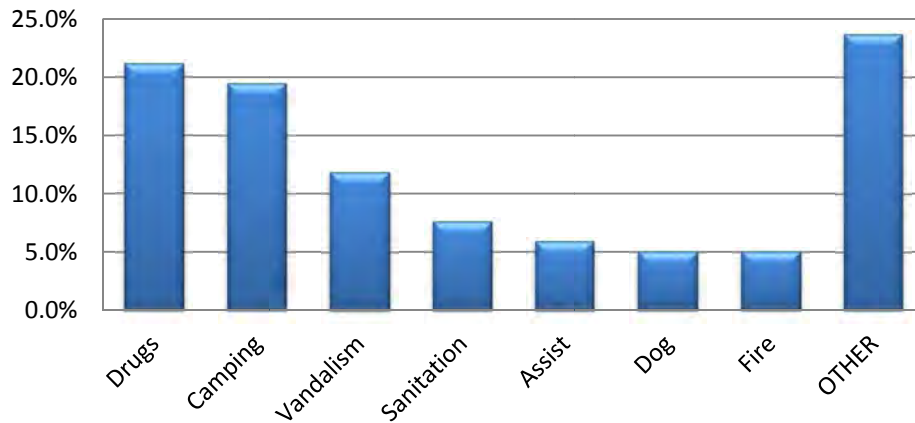
Stinson Beach Incidents - 2011

169 Total Incidents



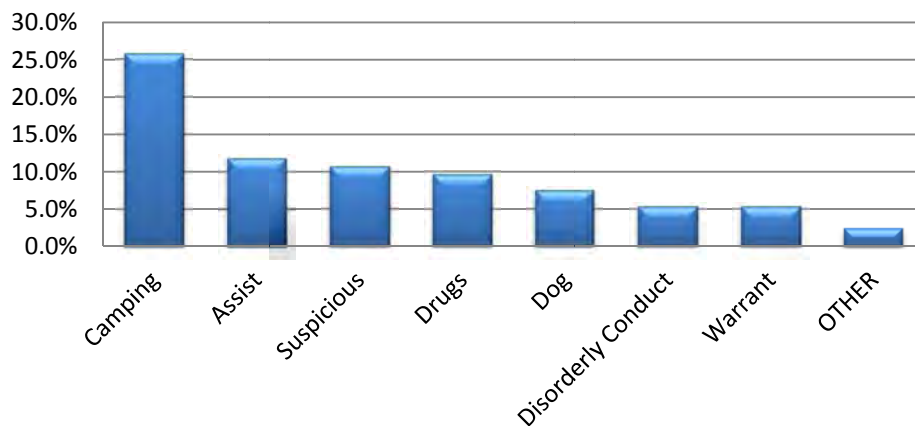
Sutro Heights Incidents - 2001

118 Total Incidents



Sutro Heights Incidents - 2002

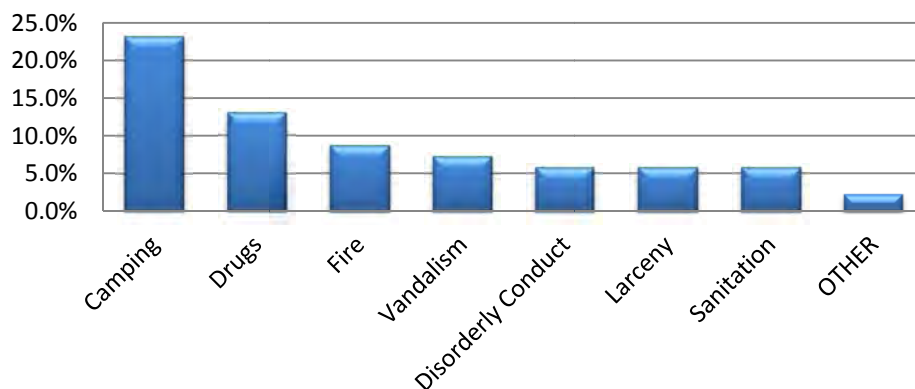
93 Total Incidents



Sutro Heights Incidents - 2003

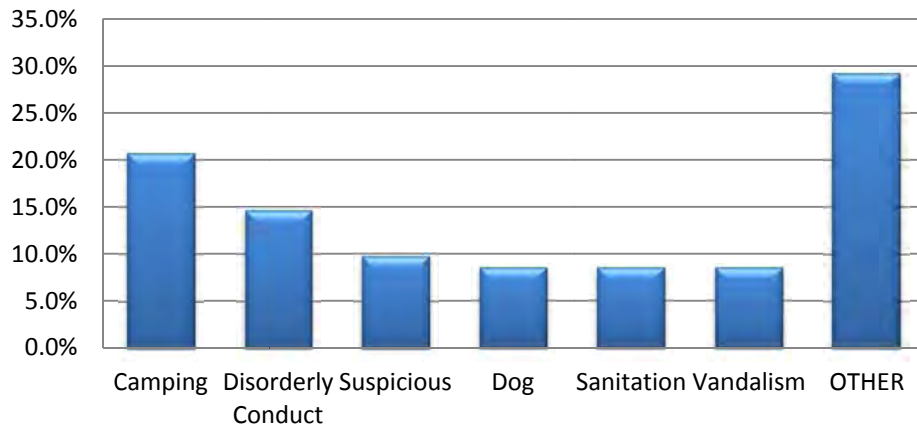
69 Total Incidents

Dog Incidents Included in "Other" = 4.3%



Sutro Heights Incidents - 2004

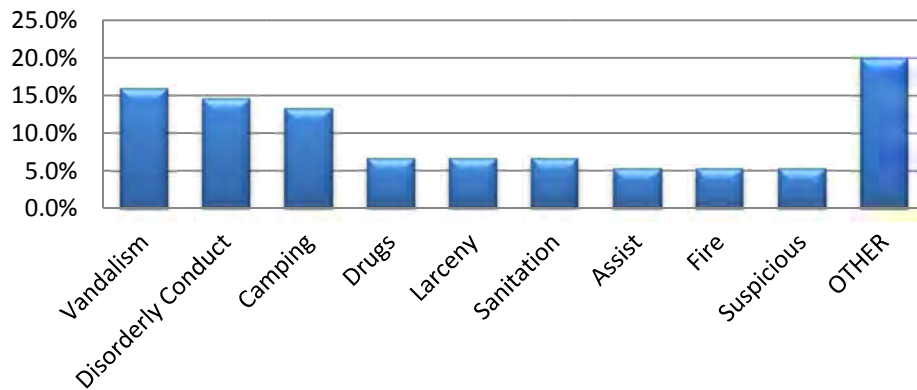
82 Total Incidents



Sutro Heights Incidents - 2005

75 Total Incidents

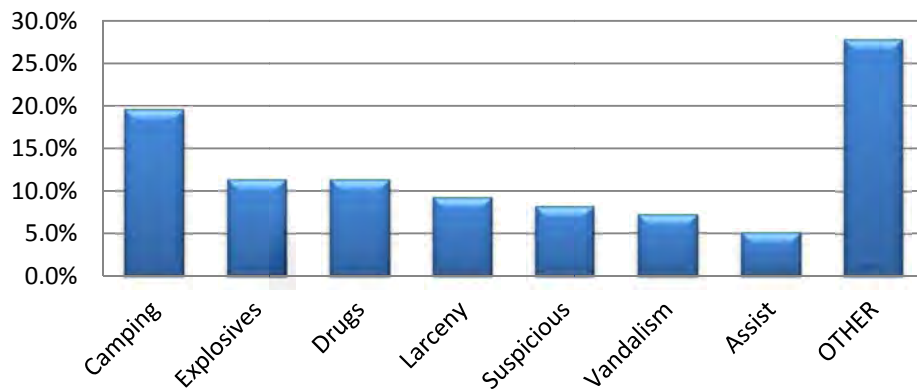
Dog Incidents Included in "Other" = 1.3%



Sutro Heights Incidents - 2006

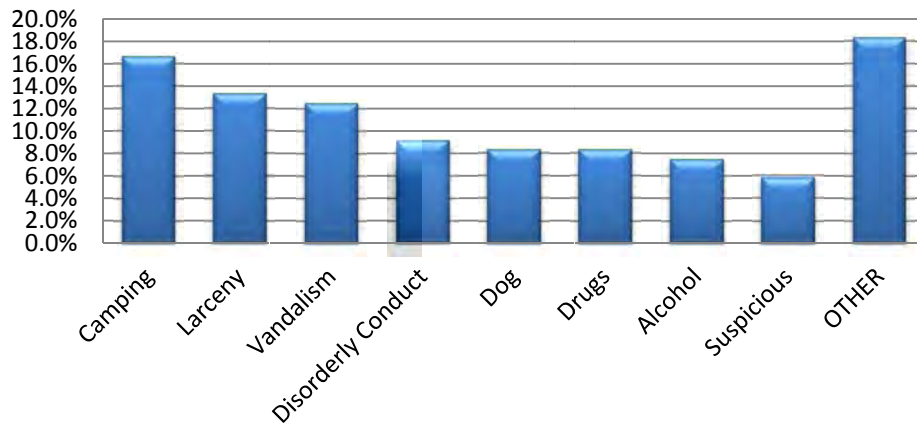
97 Total Incidents

Dog Incidents Included in "Other" = 4.1%



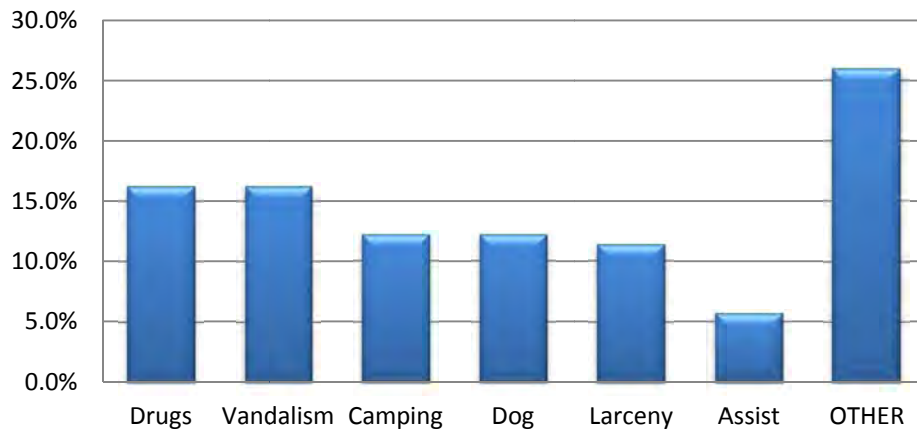
Sutro Heights Incidents - 2007

120 Total Incidents



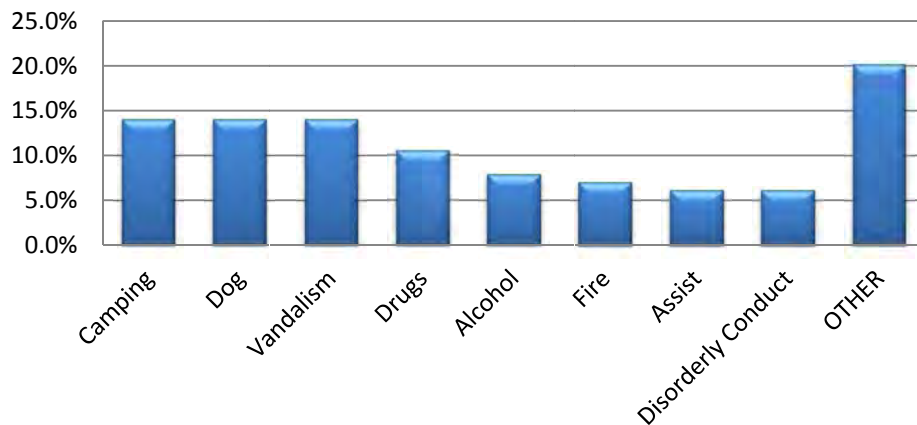
Sutro Heights Incidents - 2008

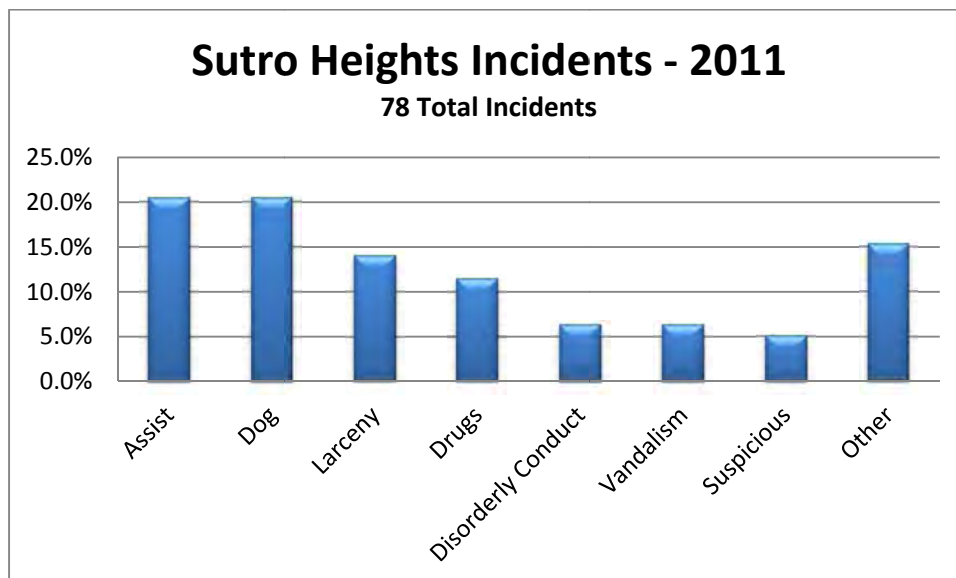
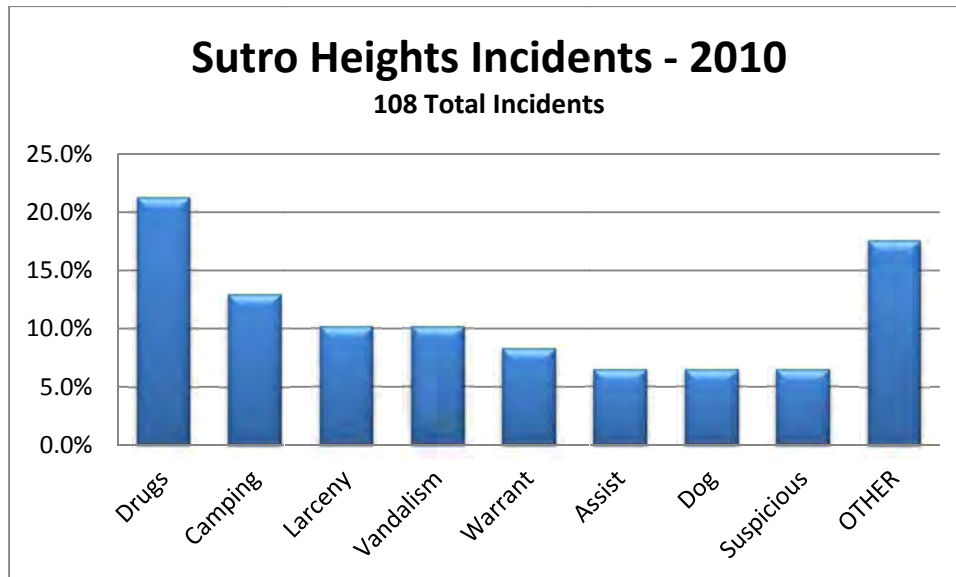
123 Total Incidents

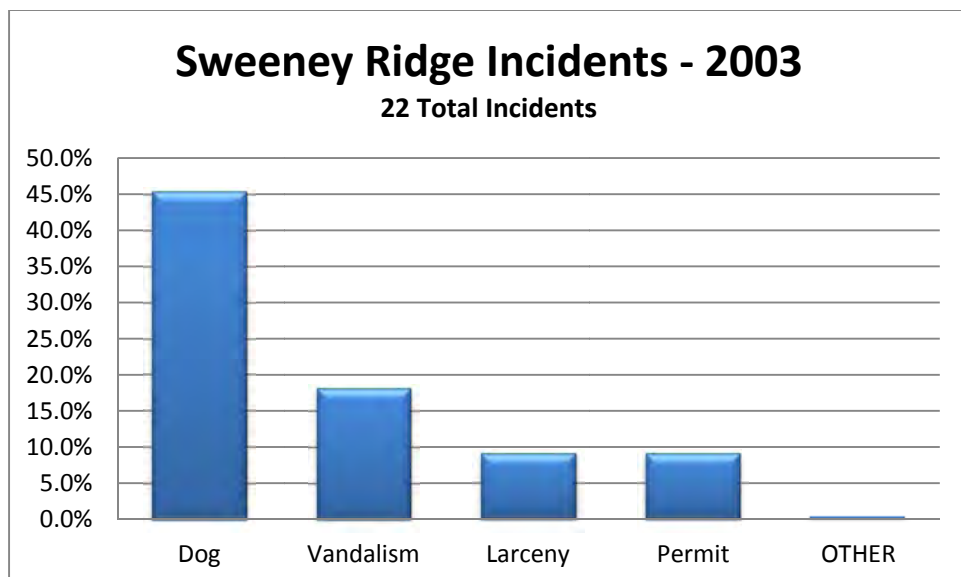
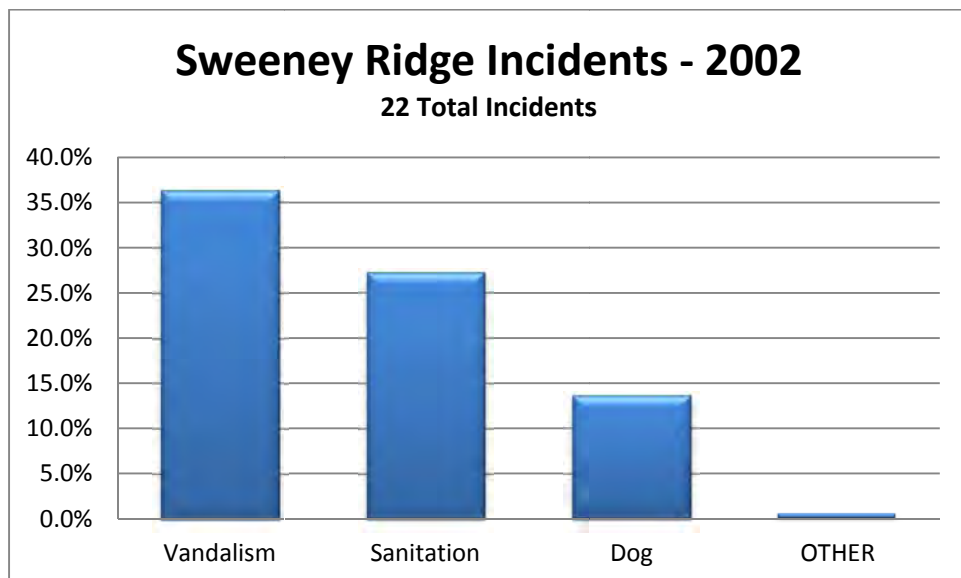
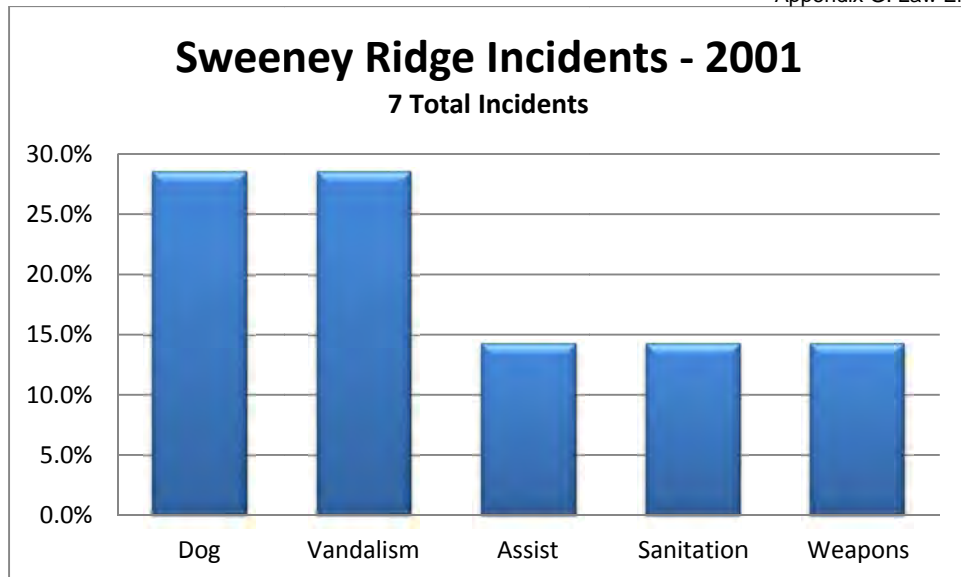


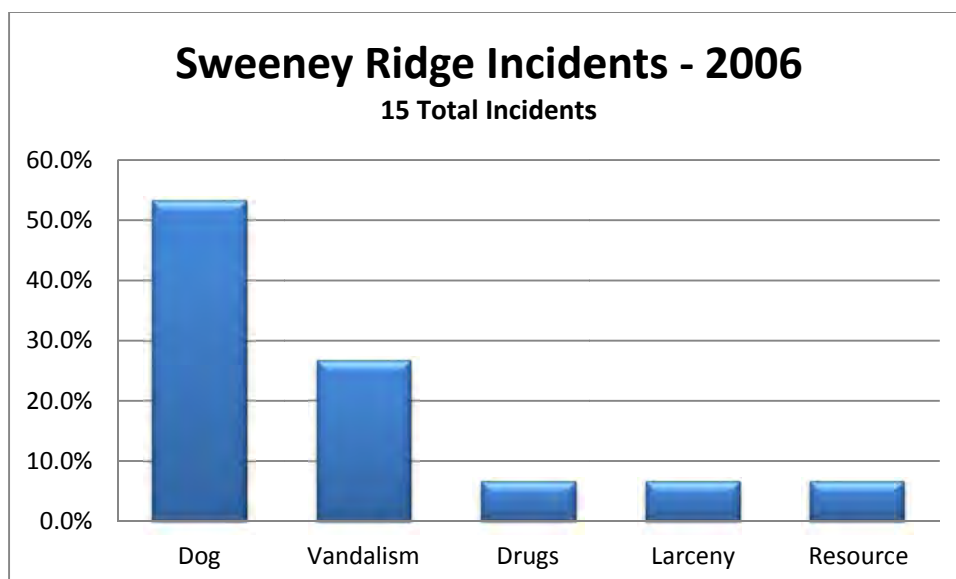
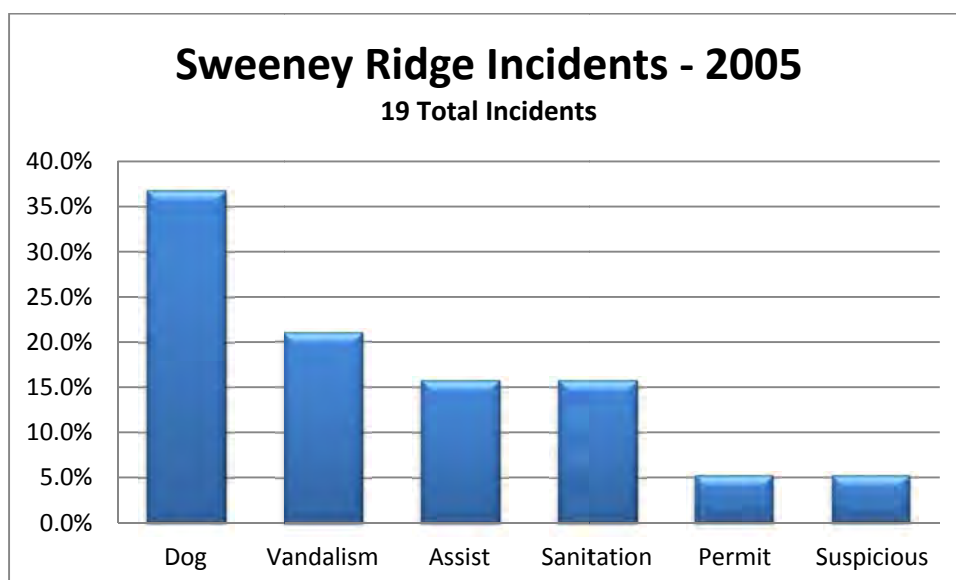
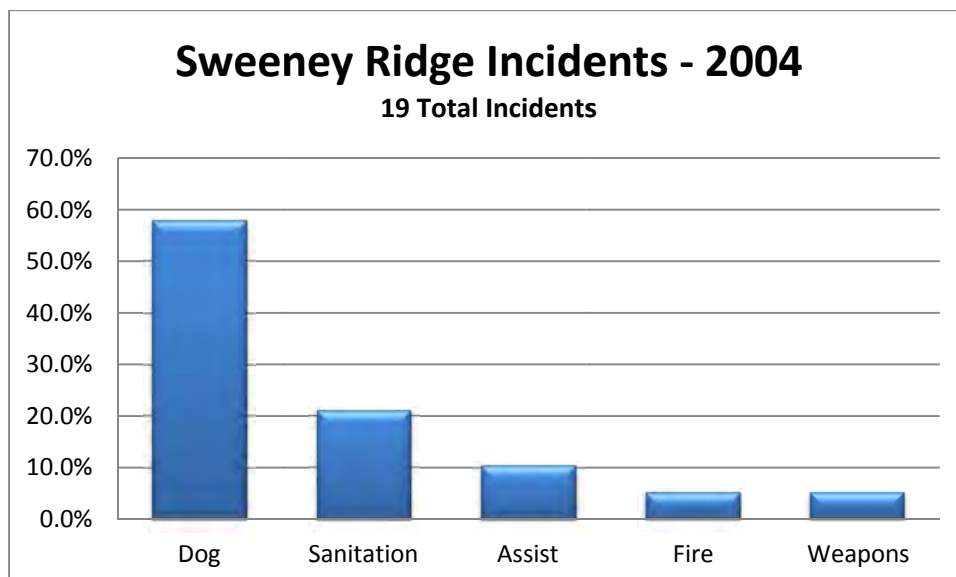
Sutro Heights Incidents - 2009

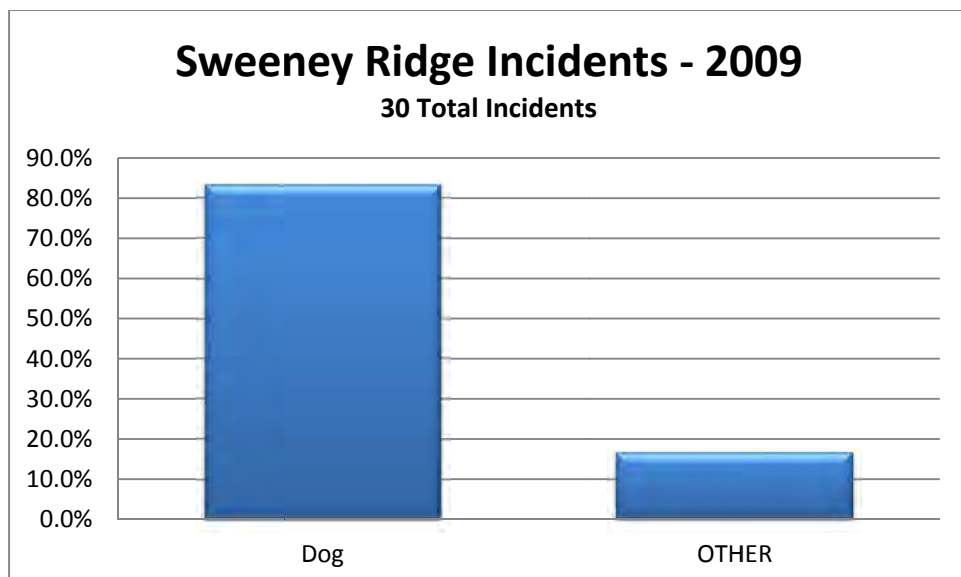
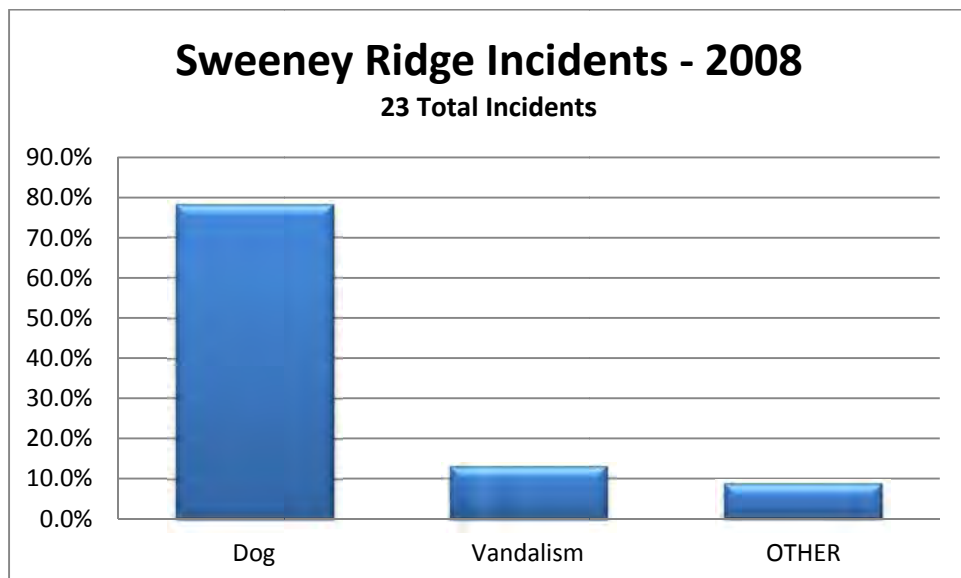
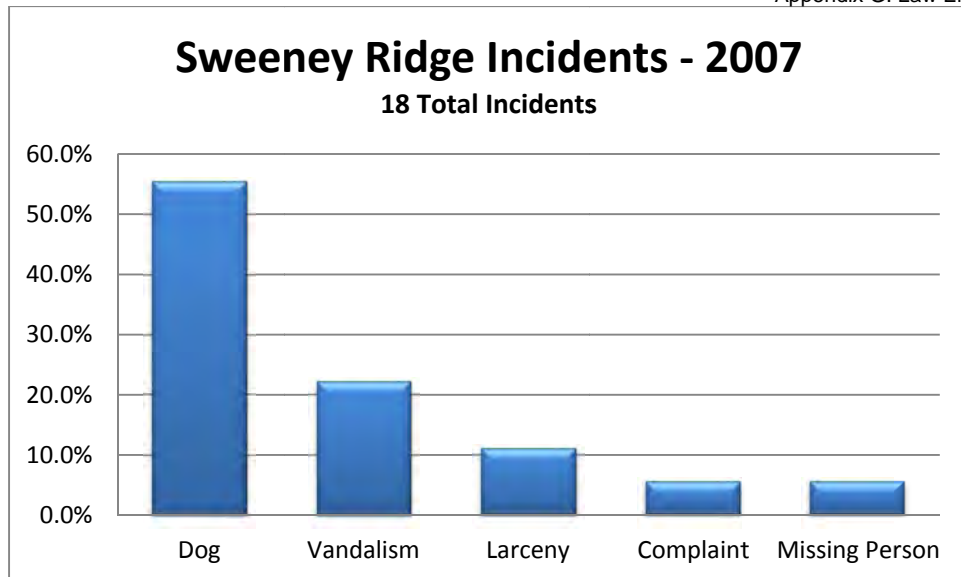
114 Total Incidents

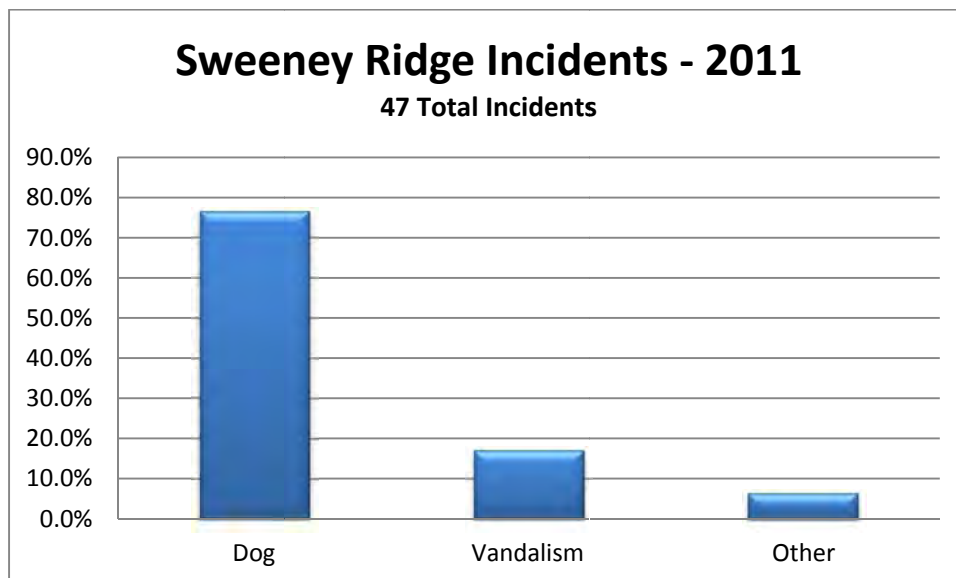
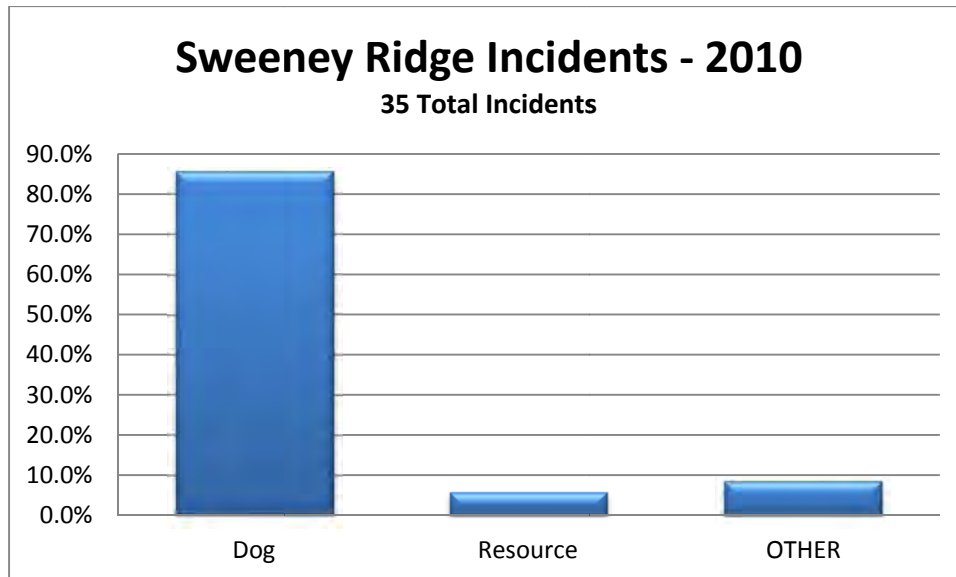




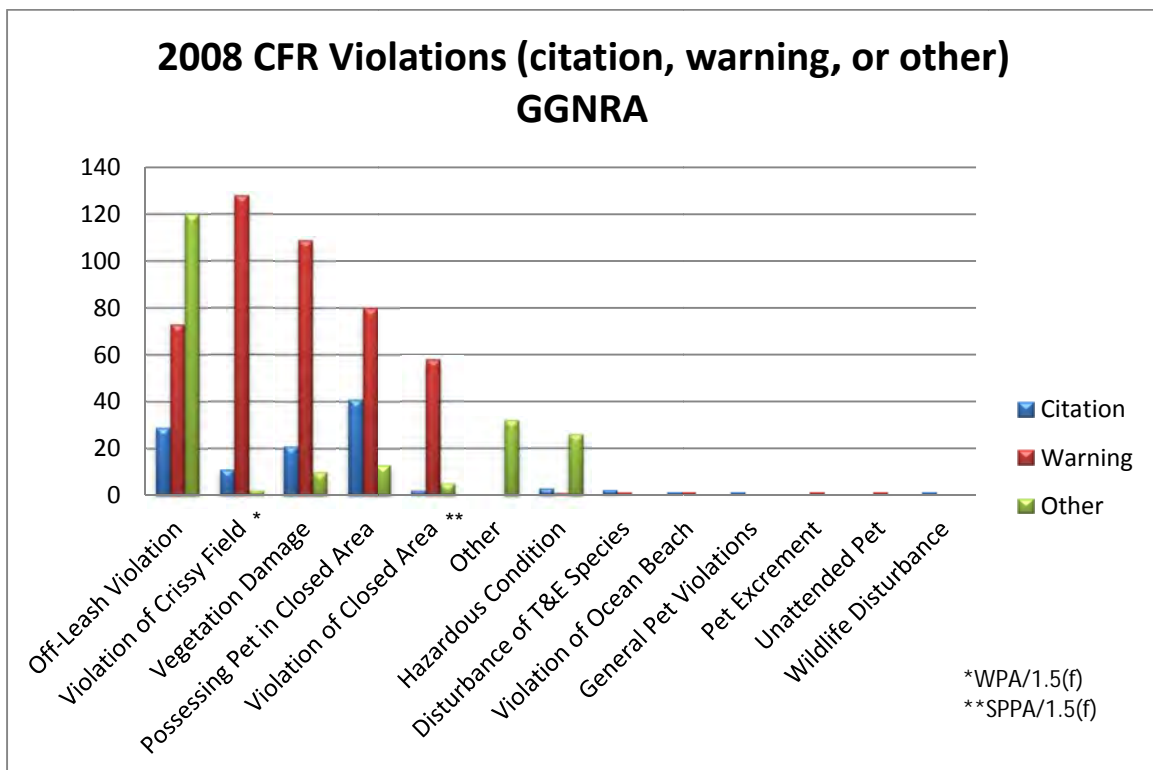
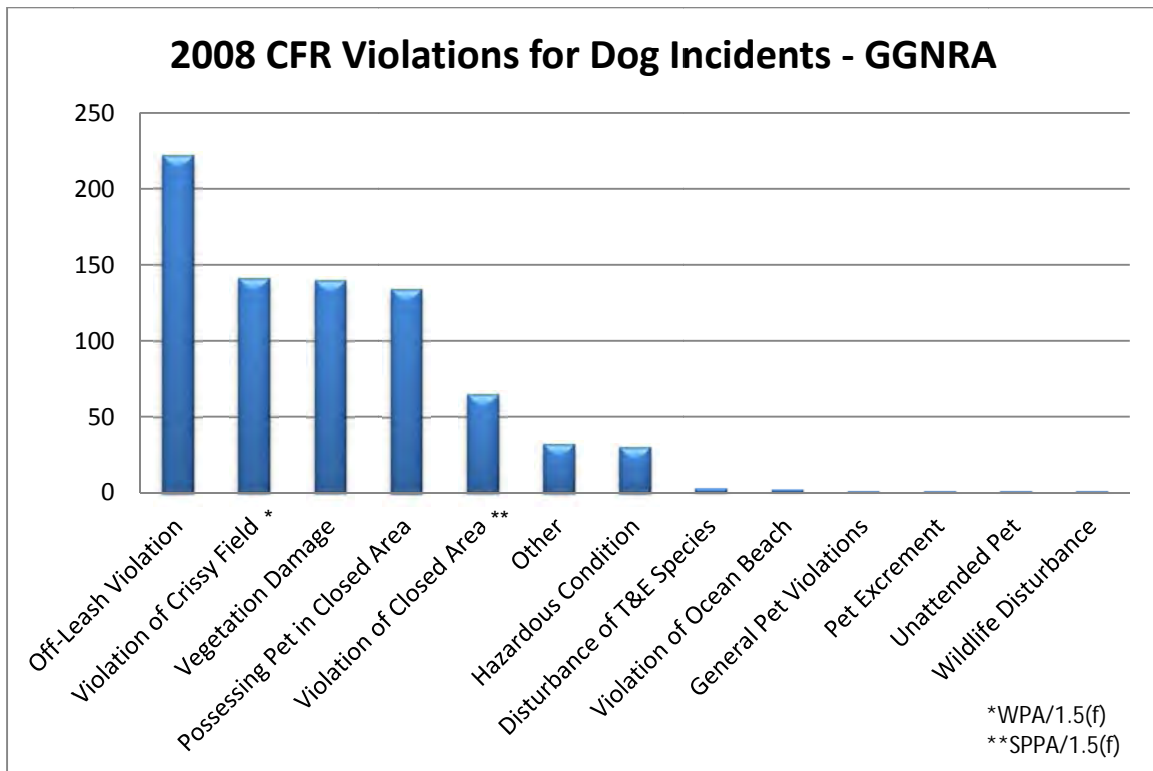




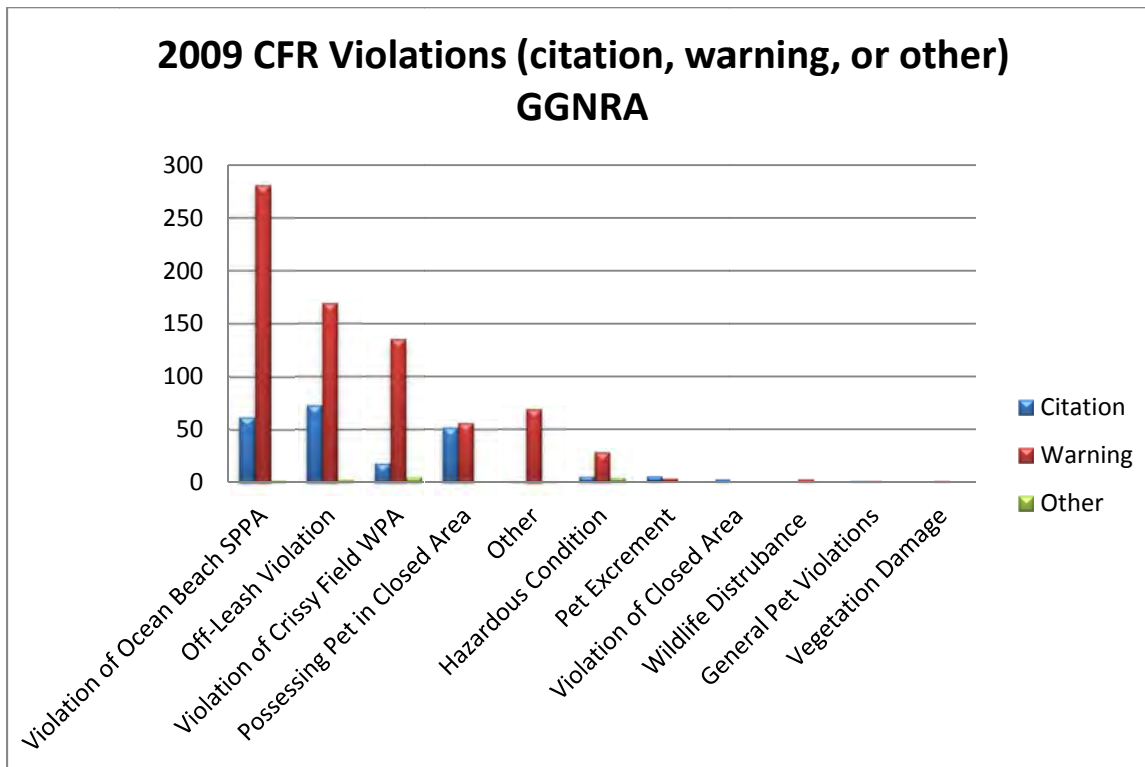
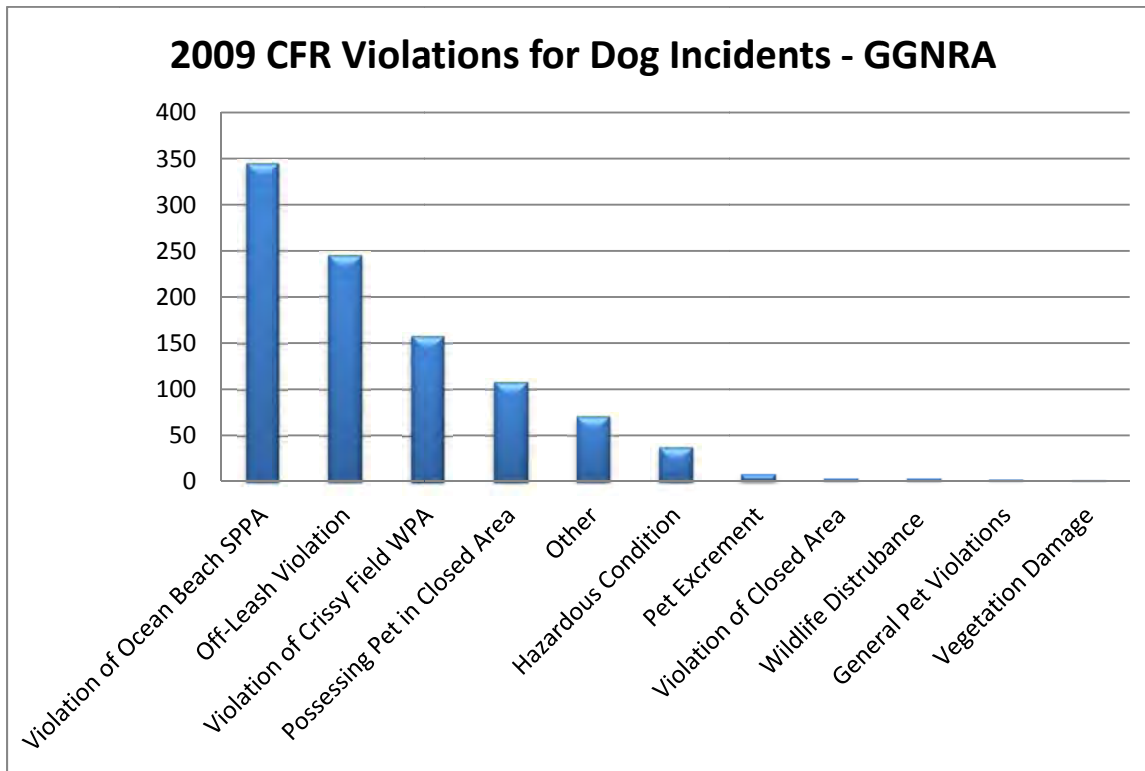




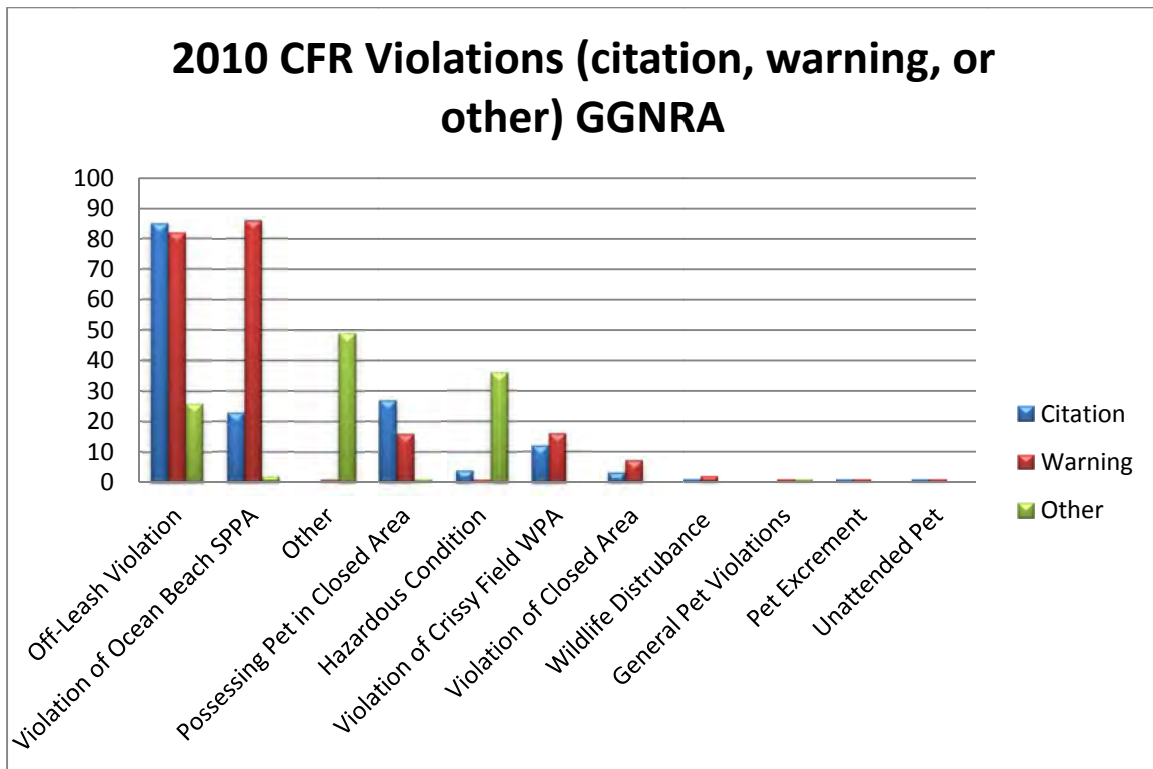
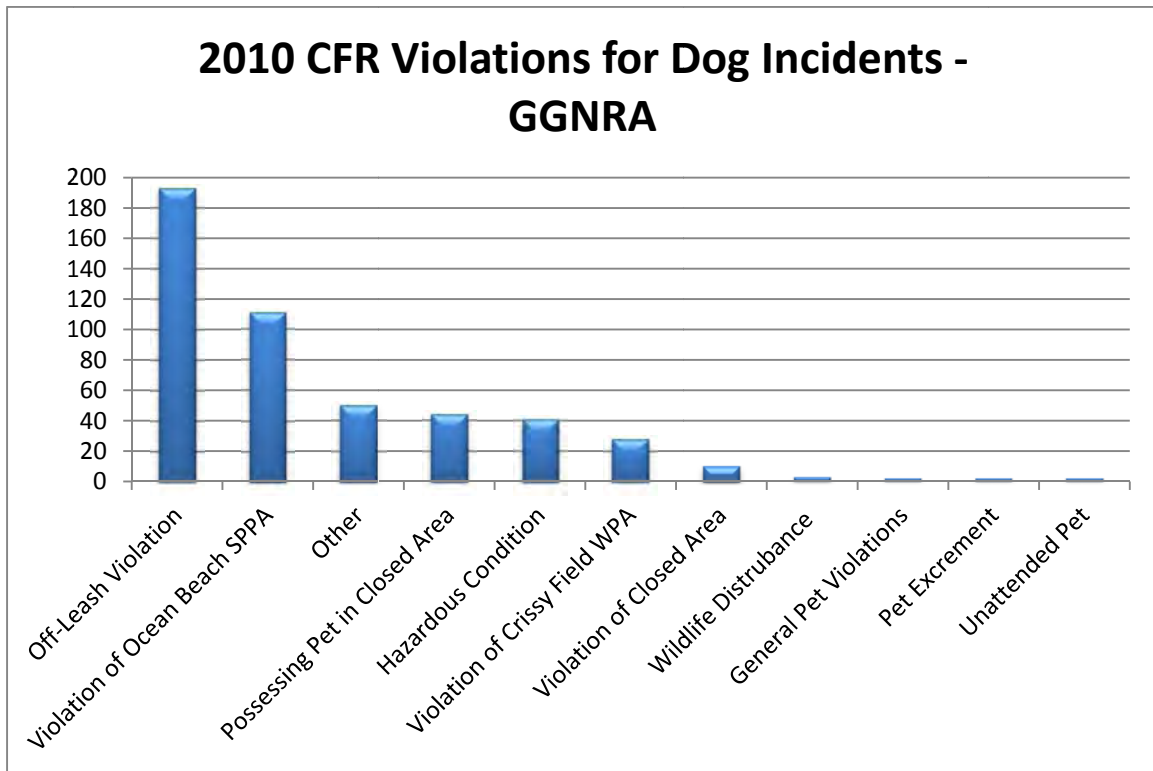
Attachment B: Graphs of LE Report Analysis for All Dog Related Incidents
B1.1 All of GGNRA - 2008



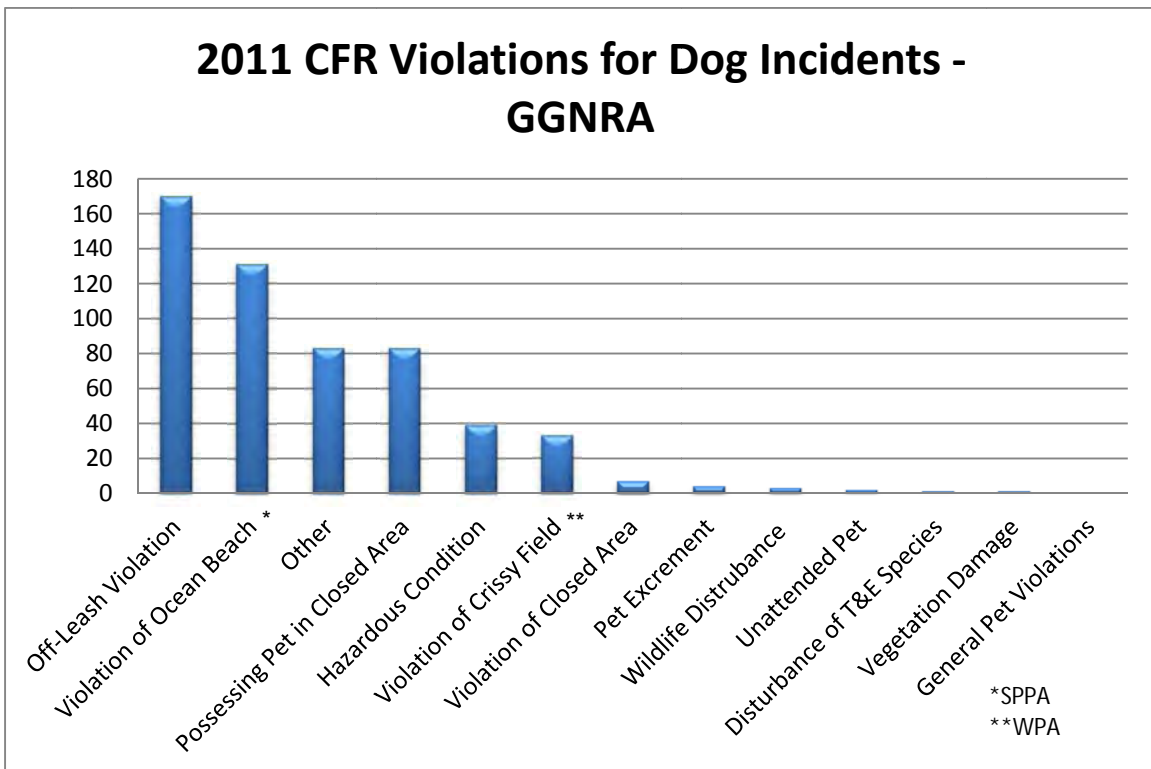
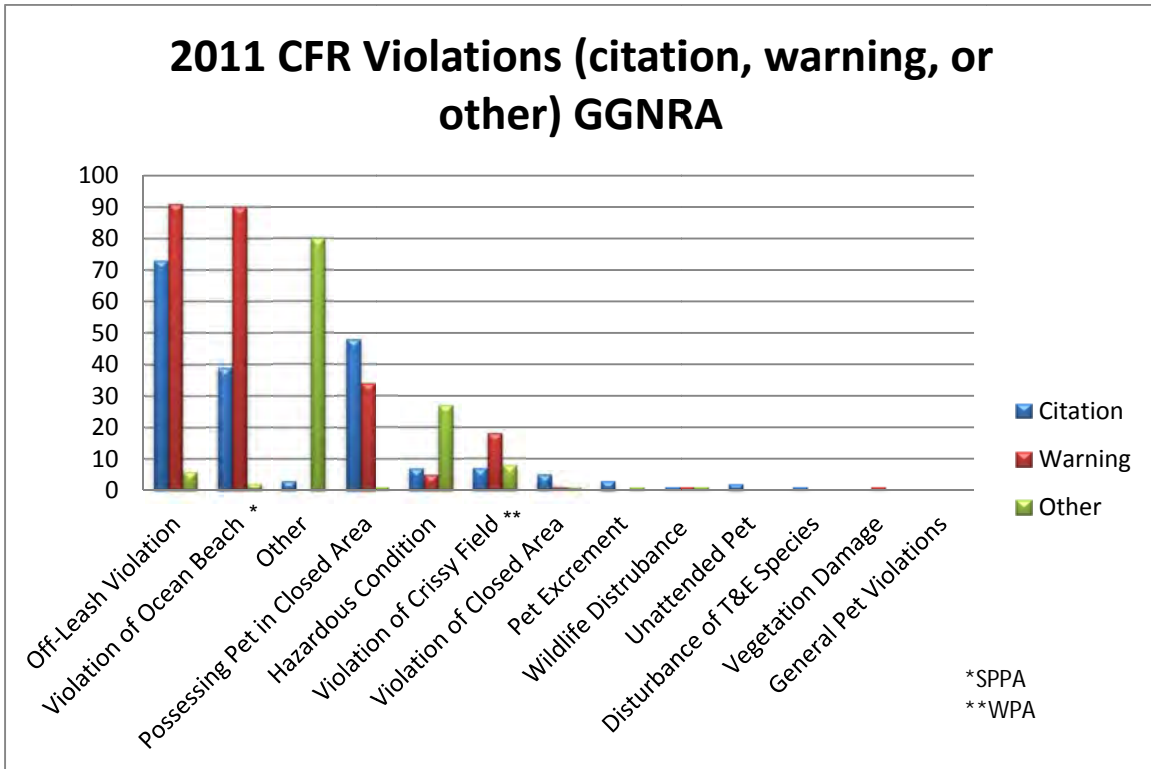
B1.2 All of GGNRA - 2009



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: TABLE OF DOG MANAGEMENT AREAS BY JURISDICTION

Jurisdiction	San Francisco Recreation and Parks Department	San Mateo County	Marin County Parks	Marin County Open Space	Marin Water District	Point Reyes National Seashore	California State Parks	Midpeninsula Regional Open Space	East Bay Regional Parks	San Francisco Watershed
Area of Managed Land	Approximately 3,400 acres.	17,000 acres; 190 miles of trail.	Approximately 900 acres total area including approximately 12 miles of paved, multiuse paths.	16,000 acres; 250 miles of official fire roads and trails, and social trails.	21,000 acres, 130 miles of road and trail. ⁱ	71,000 acres ⁱⁱ , 150 miles of trail. ⁱⁱⁱ	Approx. 12,000 acres near / adjacent to GGNRA.	Approx. 60,000 acres, 220 miles of trail. ^{iv}	Approx. 119,893 acres and 1,250 miles of trails. ^v	Approx. 61,000 acres ^{vi} (No public access).
Areas where dogs permitted on-leash	Approximately 3,400 acres minus athletic fields/courts; playgrounds; sensitive habitat areas. ^{vii}	None permitted by county ordinance; however 5.6 miles of trails are unofficially used for on-leash dog walking and are described for on-leash dog use on their website.	Currently dogs are permitted on leash in all park areas (except where noted under “areas where dogs prohibited”) and on 12 miles of multiuse pathways.	155.25 miles of trails and fire roads.*	130 miles of road and trail. ^{viii}	Approx. 14 miles of beach ^{ix} , and 1.2 miles of trail. ^x	Parking lots, paved roads only – No beaches and trails. ^{xi}	57.1 miles of trail, 17.5 acres. ^{xii}	102,797 acres and 1,133 miles of trails. ^{xiii}	None.
Areas where dogs permitted off-leash	Approximately 120 acres including trails.	None.	McInnis Park and Upton Beach provide both on and off leash areas. Approximately 50 acres of McInnis is available for on/off leash use. Metrics are not available for Upton Beach.	92.5/155.25 miles dogs are permitted off leash.*	None.	None. ^{xiv}	None. ^{xv}	17.5 acres. ^{xvi}	23 acres, 2.5 miles of trail. ^{xvii}	None.
Areas where dogs prohibited	Athletic fields/courts; playgrounds; sensitive habitat areas.	Approx. 16,000 acres, 179.4 miles of trails.	Dogs are not permitted at McNears Beach, Paradise Beach, and Stafford Lake parks. Dogs are not allowed in sensitive resource areas, in play areas, in playgrounds, on play equipment, and on ball fields.	All areas except for trails and fire roads.	21,000 acres.	All undeveloped areas, most beaches, and trails.	All areas except parking lots and paved roads.	Approx. 59,983 acres and 163 miles of trail.	17,096 acres and 117 miles of trail.	61,000 acres.
Notes	SF Recreation and Park manages 32 dog play areas: The Port of San Francisco manages 1 dog play area (Heron’s Head Park). Candlestick was removed from Recreation and Park management and reduced the past reported acreage) (Personal communication with Director on 11-15-16). 5 new dog parks have been added since 2006. And 3 new dog play areas are currently in development.	San Mateo County Parks Department is initiating a comprehensive Dog Management Strategy for County Parks that will determine where dogs can use parks and trails. This will result in changes to policies, ordinances, and practices. Dog friendly trails reported on www.parks.smcgov.org: Coyote Point Recreation Area Bay Trail 1.2 miles; Fitzgerald Marine Reserve CA Coastal Trail .3 mile; Devils Slide CA Coastal Trail 1.3 miles; Pillar Point Bluff Jean Lauer Trail 1.4 miles; Mirada Surf CA Coastal Trail .3 mile; Quarry Park Vista Point 1.1 miles.		<i>*calculation subject to change with implementation of Road and Trail Management Plan system designation process currently underway</i>						
Information Source/ Point of Contact	Stacey Bradley Deputy Director of Planning Stacy.Bradley@sfgov.org	Sam Herzberg Senior Planner sherzberg@smcgov.org	Max Korten Acting Director & General Manager mkorten@marincounty.org Cristina Torresan Communications Manager ctorresan@marincounty.org	Gabe Ngarangad Ranger ngarangad@marincounty.org Cristina Torresan Communications Manager ctorresan@marincounty.org						

Jurisdiction	San Francisco Recreation and Parks Department	San Mateo County	Marin County Parks	Marin County Open Space	Marin Water District	Point Reyes National Seashore	California State Parks	Midpeninsula Regional Open Space	East Bay Regional Parks	San Francisco Watershed
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Note: Information for San Francisco Recreation and Parks Department, San Mateo County, Marin County Parks, and Marin County Open Space was updated through personal communication with representatives for each organization, as noted in the last row of the table. This information may differ from that on websites but is considered the most current, based on review of this information by these individuals. Information presented in the table for other organizations is based on information available on their respective websites.

Resources:

San Francisco County and City Resources
Final Dog Policy (May, 2002) http://sstasio.wpengine.netdna-cdn.com/wp-content/uploads/Final_Dog_Policy_2002.pdf
Dog Play Area Master Planning- <http://sfrecpark.org/about/publications/dog-play-area-master-planning/>
Marin County Resources
Dogs in Open Space: <http://www.marincountyparks.org/depts/pk/divisions/open-space/main/dogs>
Open Space Trail Conditions: <http://www.marincountyparks.org/depts/pk/divisions/open-space/main/trail>
Filter by Activity (Dogs Allowed): <http://www.marincounty.org/depts/pk/activities>
Dogs in Parks: <http://www.marincounty.org/depts/pk/divisions/parks/main/dogs>
County Fire Dept: <http://www.marincounty.org/depts/fr>
Non-government Dog Park Resources in Marin County
http://www.dogfriendly.com/server/travel/uscities/guides/w/cities/wonlinecityCAMarin_-_North_Bay.shtml
Marin Humane Society Dog Park: http://www.marinhumanesociety.org/site/c.ailOI3NLKgKYF/b.7727935/k.B618/Dog_Parks__Campus_Facilities.htm
Sausalito Dog Park: <http://sausalitodogpark.org/about>

ⁱ <http://www.marinwater.org/189/Biking-Dog-Walking-Hiking-Riding-Picnick>
ⁱⁱ http://www.nps.gov/pore/learn/news/upload/newspaper_visitorguide_2012.pdf
ⁱⁱⁱ http://www.nps.gov/pore/planyourvisit/hiking_guide.htm
^{iv} <http://www.openspace.org/sites/default/files/DistrictFactSheet.pdf>
^v <http://www.ebparks.org/parks>
^{vi} <http://www.sfwater.org/index.aspx?page=134>
^{vii} <http://sfrecpark.org/parks-open-spaces/natural-areas-program/natural-areas-faqs/>
^{viii} <http://www.marinwater.org/189/Biking-Dog-Walking-Hiking-Riding-Picnick>
^{ix} <http://www.nps.gov/pore/planyourvisit/beaches.htm>
^x http://www.nps.gov/pore/planyourvisit/upload/sitebulletin_dogs.pdf
^{xi} http://www.parks.ca.gov/?page_id=22542
^{xii} <http://www.openspace.org/what-to-do/activities/dogs>
^{xiii} <http://www.ebparks.org/activities/dogs>
^{xiv} <http://www.nps.gov/pore/planyourvisit/pets.htm>
^{xv} <http://ohv.parks.ca.gov/pages/1140/files/14%20ccr%20sec%204312.pdf>
^{xvi} <http://www.openspace.org/preserves/pulgas-ridge>
^{xvii} http://www.ebparks.org/parks/pt_isabel

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/pdes/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.marincounty.org/~media/files/departments/fr/prevention/publications/marin_2012_fire_plan_final_draft.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/park-improvements/past-accomplishments/coastal-trail-pirates-cove.html
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/visit/park-sites/marin-headlands.html
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.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
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.	https://www.nps.gov/goga/learn/management/foma_long-term-lease.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
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.	https://www.nps.gov/goga/learn/management/upload/-462-Environmental-Assessment-for-Crissy-Field-Plan.pdf
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/about/press/press-releases/crissy-field-center-is-on-the-move.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.	http://www.sfgate.com/outdoors/urbanoutings/article/Lobos-Creek-Valley-Trail-Dunes-restored-3182172.php
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/park-improvements/past-accomplishments/lands-end-trail-lookout.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://sfrecpark.org/wp-content/uploads/COFRound1-SutroDunesPark.pdf
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).	http://www.parksconservancy.org/park-improvements/current-projects/san-mateo/milagra-ridge.html
Eagles Point Overlook Replacement	Eagles Point	Infrastructure	This project replaced the existing deteriorated viewing platform with a new view point. The new view point is more accessible, easier to maintain, and set back within the trail alignment. The view point design included benches for sitting and enjoying views of the Golden Gate. A small concrete curb protects the viewpoint's outer edge. Non-native, invasive trees have been removed from the viewshed. The trail to the new viewpoint has been resurfaced and regraded to meet the Draft Final Accessibility Guidelines for Outdoor Developed Areas (AGODA) standards. Native vegetation was planted in areas disturbed by tree and overlook removal and adjacent to the new viewpoint.	https://www.nps.gov/goga/learn/management/eagles-point-overlook-replacement.htm

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Sutro Historic District EA and FONSI	Sutro Heights	Environmental Assessment	The comprehensive design for the Sutro Historic District was driven by the need to resolve a complex set of issues. Natural systems, historic landscape, and recent human intervention were balanced to support future use and provide a quality visitor experience.	https://www.nps.gov/goga/learn/management/completed-plans-and-projects.htm
GGNRA & Muir Woods National Monument General Management Plan	Parkwide	General Management Plan	The new plan for Golden Gate National Recreation Area and Muir Woods reflects the intent of Congress in establishing the parks, as well as the vast amount of knowledge about the parks' exceptional natural and cultural resources that has been gained since 1980. The plan offers a vision of the park that accommodates its changing cultural and social landscape. It was developed in the context of the evolution in attitudes toward conservation and preservation that has occurred over the past three decades - as well as changing preferences in modes of transportation, recreation choices, and ways of experiencing parklands. The vision in this plan is predicated on partnership as an effective management approach, and will rely on the continued support of our partners, especially the Golden Gate National Parks Conservancy.	https://www.nps.gov/goga/learn/management/upload/GOGA_FGMP_Volume_I-3.pdf
Ocean beach Sand Management Plan	Ocean Beach	Planning Document	The NPS in cooperation with the San Francisco Public Utilities Commission (SFPUC) conducted sand management activities in early October. This activity was a repeat of the successful sand management actions done in 2012 where excess sand in front of the O'Shaughnessy Seawall (north Ocean Beach) is transported to the erosion hotspot south of Sloat Boulevard (south Ocean Beach).	https://parkplanning.nps.gov/projectHome.cfm?projectId=53313
Golden Gate Bridge 75th Anniversary South Plaza Improvements	Bridge Plaza	Rehabilitation	In preparation for the 75th Anniversary, the southeast plaza on the San Francisco side of the bridge has been revitalized, improving the experience for the millions of people who visit the Bridge each year and reflecting the natural beauty and historic significance of this world-class destination. The Golden Gate Bridge, Highway and Transportation District has also undertaken various construction projects that affect bicyclists and pedestrians visiting the bridge.	http://goldengatebridge75.org/about/site-improvements.html

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
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 was 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 was 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)
34th America's Cup Event	Parkwide	Sailing race	The 34th America's Cup event brought sailing teams from around the world to race within San Francisco Bay; preliminary races were held in 2012; the America's Cup race was held in 2013. The event included 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 realigned trail segments and restored degraded areas on Dias Ridge. Specifically, the project removed unauthorized trails and replace or rehabilitate poorly aligned and eroding trail segments. This project improved parkland resources by reducing soil erosion in the project, minimized sediment from reaching Redwood Creek, and improved the trail alignment to support existing authorized trail-use designations.	http://www.nps.gov/goga/parkmgmt/planning.htm
Nonpoint Source Watershed Assessment for the James Fitzgerald Marine Reserve Critical Coastal Area	Martini Creek watershed, San Mateo County	Watershed assessment	Project benefited 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.sanmateorcd.org/CCA%20Watershed%20Assessment
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 furthered 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 presented residents with the opportunity to more easily socialize in public spaces.	http://www.cityofmillvalley.org/Modules/ShowDocument.aspx?documentid=3320

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Wetland and Creek Restoration at Big Lagoon	Muir Beach	Ecological restoration	Project aimed to restore a functional, self-sustaining ecosystem at Big Lagoon. The project included 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 was located at Muir Beach and included 38 coastal acres including the small intermittent tidal lagoon at the beach.	https://www.nps.gov/goga/learn/management/biglagoon.htm
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.	https://www.nps.gov/goga/learn/management/mmc.htm
Main Parade Ground Rehabilitation Project	Presidio (Area B)	Facilities improvements	The project consisted of rehabilitating the red brick buildings, which included paving, grading, relocating utilities, and addressing drainage necessary for a relocated parking lot and a new lawn area.	http://www.presidio.gov/places/main-parade-ground
Mori Point Restoration and Trail Plan	Mori Point, San Mateo County	Trail restoration	Project included 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.	https://parkplanning.nps.gov/projectHome.cfm?projectId=13093
Devil's Slide Tunnels Project	Pedro Point, Pacifica	Highway repair	Two inland tunnels were created to bypass Devil's Slide, in order to provide a safe, dependable highway between Pacifica and Montara.	http://www.dot.ca.gov/dist4/dslide/ http://parks.smcgov.org/devils-slide-coastal-trail-project
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
Sea Level Rise Interpretive Exhibit	Crissy Field	Climate change presentation	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

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 - 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. Restoration of this trail section was completed in 2013.	https://www.nps.gov/goga/learn/management/upload/-1864-southern-marin-headlands-update-1.pdf
Tennessee Valley / Manzanita Connector Trail Project	Tennessee Valley, Marin Headlands	Transportation	The goals of this San Francisco Bay Conservation and Development Commission Project was 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.walkbikemarin.org/tvupdates.php
Marin Headlands and Fort Baker Transportation Infrastructure and Management Plan	Marin Headlands	Land use plan, improved visitor experience	This project focused 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.	https://www.nps.gov/goga/learn/management/upload/feis_2009-0310_150dpi.pdf
Current Projects (Construction Underway or Planning in Progress or Complete)				
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
Final Ocean Beach Fire Program	Ocean Beach	Planning Document-regulation	NPS has completed its planning process and made a decision on the elements of the development of the final Ocean Beach Fire Program. The final program includes 12 elements designed to create a safe, manageable, and sustainable beach fire program.	https://parkplanning.nps.gov/projectHome.cfm?projectId=59097

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Redwood Creek Trail Realignment	Redwood Creek	Trail Plan	The Redwood Creek Trail Realignment and Dias Ridge Extension Trail project includes realigning a section of the Redwood Creek Trail, improvements to the existing Redwood Creek Trail, and construction of a 1,300 linear foot extension to the Dias Ridge Trail. The project is being planned in coordination between the California State Parks and the National Park Service. The purpose of the proposed action is three-fold: (1) to create a safer and more sustainable trail for visitors; (2) reduce adverse effects of Redwood Creek Trail on Redwood Creek and the multiple drainages to the creek crossed by the trail; and (3) to connect the southern ends of Redwood Creek Trail and Dias Ridge Trail by an extension of the Dias Ridge Trail to create a 5.4 mile circuit	https://parkplanning.nps.gov/projectHome.cfm?projectId=54012
Muir Woods Reservation Environmental Assessment	Muir Woods	Environmental Assessment	The proposed reservation system was informed by goals outlined in the General Management Plan, the Redwood Creek Watershed Vision for the Future, transportation experts, and feedback from stakeholders and members of the public gathered over the last twenty months. The proposed reservation system would enable the park to proactively manage parking and visitor flow to protect the health of the Redwood Creek Watershed, and allow for greater enjoyment of this treasured park site by effectively addressing overcrowding, traffic congestion, and parking issues.	https://parkplanning.nps.gov/document.cfm?parkId=303&projectId=48272&documentId=68898
Muir Woods Salmon Habitat Enhancement and Bridge Replacement Project	Muir Woods	Restoration	The restoration of Redwood Creek in Muir Woods represents one of the best opportunities in the watershed to improve conditions for salmon. This project calls for the removal of selected large boulders called riprap that were placed on the banks of Redwood Creek over 80 years ago to stabilize the stream banks. Following the riprap removal, large woody debris would be installed in the creek. These two actions will significantly improve the conditions needed to help young fish survive.	https://parkplanning.nps.gov/projectHome.cfm?parkId=303&projectId=62983

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Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Crissy Field Refresh Planning	Crissy Field	Planning Document	<p>Fourteen years after the restoration of San Francisco's Crissy Field, the National Park Service, Parks Conservancy, and Presidio Trust are reassessing how visitors use Crissy Field, reviewing natural and cultural restoration goals, and taking stock of interpretive and maintenance needs.</p> <p>As part of this process, the input of people and groups who know and use, and love or feel connected to Crissy Field are being considered. The input received will help understand the desires of the community and shape the plan as it moves forward.</p>	https://parkplanning.nps.gov/projectHome.cfm?projectId=48967
Demolition and Removal of Nike Missile Site Structures and Utilities, Sweeney Ridge	Sweeney Ridge	Demolition	<p>The buildings associated with the Nike Missile Site at Sweeney Ridge were closed in 1974 and became part of GGNRA in 1984. The structures have deteriorated over time; although the walls remain in fair condition, the roofs are collapsing and lead paint is peeling from the walls, posing a safety hazard to the public and park staff. In addition, the site has become a popular location for graffiti and dumping.</p> <p>An effort was made in 2010 to stabilize the buildings, including boarding up doors and windows with plywood for public safety. Despite continued efforts by park staff to prevent entry into the buildings, the boards are repeatedly removed and the structures continue to be an attractive nuisance and safety hazard, diminishing the visitor experience at Sweeney Ridge.</p>	https://parkplanning.nps.gov/projectHome.cfm?projectId=52936
Perform Flood Repairs, Stinson Beach	Stinson Beach	Repair/Rehabilitation	<p>On February 6th, 2014 a series of storms delivered over 20 inches of rain on Mt. Tam and surrounding watersheds over four days. The highest intensity rainfall (up to about 0.8 in/hr at Middle Peak Mt. Tam) occurred on February 9th. This event caused Easkoot Creek, a coastal stream that goes through the community of Stinson Beach and NPS parklands, to overtop its bank and flood low-lying areas of the community and NPS parkland. Exacerbating the flooding, a recently constructed sediment detention basin located on Easkoot Creek, was intentionally breached under the direction of the Marin County Flood Control. The breaching of the berm containing the sediment basin caused high velocity flood flows to go through NPS parklands causing damage to NPS infrastructure including pedestrian pathways and the North Parking lot. This project would repair the damages caused by the February 9th flood.</p>	https://parkplanning.nps.gov/projectHome.cfm?projectId=53241

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
Proposed Fee Increases within Golden Gate National Recreation Area	Parkwide	Fee Collection	GGNRA is considering fee increases and new parking fees within the park. The Federal Lands Recreation Enhancement Act (FLREA) establishes fee collection on federal lands, and National Parks collecting fees can retain 80% of those revenues in order to support projects that improve the visitor experience. The new fees collected will continue to support projects that have a direct visitor benefit.	https://parkplanning.nps.gov/projectHome.cfm?projectID=55192
Rehabilitate Cavallo Point Lodge Historic Building 615, Fort Baker	Fort Baker	Repair/Rehabilitation	The Fort Baker Retreat Group (FBRG) LLC proposes a project that will rehabilitate historic Building 615, a small, 1-story wood frame former Army guardhouse, into a public-serving bakery cafe with kitchen addition as part of Cavallo Point, the Lodge at the Golden Gate. The project would reduce existing crowded kitchen facilities in Building 602 (aka the Murray Circle restaurant) by relocating all bakery functions from that structure, in addition to activating an important "gateway" building to the entire Lodge campus.	https://parkplanning.nps.gov/projectHome.cfm?projectID=57476
Replace and Extend Stormwater Outfall IJKL, Crissy Field	Crissy Field	Maintenance	The purpose of the project is to increase discharge capacity of IJKL, reduce flooding onto Mason Street, and extend the stormdrain and outfall to just beyond the 50-year sand accretion point. The shoreline at Crissy Beach has accreted, and is anticipated to continue accreting over the next decades. To ensure long-term function of the stormdrain, the outlet is being located beyond the anticipated accretion point. Increasing the capacity of IJKL is needed to accommodate additional stormwater runoff from Park Presidio (Doyle Drive).	https://parkplanning.nps.gov/projectHome.cfm?projectID=46130
Vista Point Multi-Use Trail, Fort Baker	Fort Baker	Right-of-Way	The National Park Service proposes improvements to the Vista Point Trail at Fort Baker to provide an important trail connection for pedestrians and bicyclists from the north side of the Golden Gate Bridge to Fort Baker and Sausalito. The project would convert a closed trail segment to a multi-use trail to provide a safer and more scenic route that is free of cars. The purpose of the project is to improve and reopen a trail for public use, which will reduce vehicle-bicycle and vehicle-pedestrian conflicts on Alexander Avenue.	https://parkplanning.nps.gov/projectHome.cfm?projectID=41351
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

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Plans and Projects	Location	Type of Project	Purposes of the Project	Source
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
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)
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) 1434-1445 at http://aslo.org/lo/toc/vol_53/issue_4/1434.pdf
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.	http://goldengatebridge.org/projects/retrofit.php
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.	https://www.nps.gov/goga/learn/management/alcatraz-ferry.htm
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.	https://www.nps.gov/goga/learn/management/upload/PEPC_Exec_Summary.pdf
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/

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Plans and Projects	Location	Type of Project	Purposes of the Project	Source
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
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.presidio.gov/presidio-trust/planning-internal/Shared%20Documents/Planning%20Documents/PLN-344-VmpEa_200112.pdf
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/presidio-trust/planning-internal/Shared%20Documents/Planning%20Documents/PLN-344-QMstrReachEA_20100921.pdf
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

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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.parksconservancy.org/park-improvements/current-projects/san-francisco/coasta-trail-presidio.html
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/Updated_LRDP_2014.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 http://www.sanfrancisco.va.gov/visitors/construction.asp
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

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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://pedropointheadlands.org/
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.	https://parkplanning.nps.gov/projectHome.cfm?projectId=14568
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.	http://parks.smcgov.org/pedro-point-headlands-improvement-restoration-project

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
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.	https://parkplanning.nps.gov/projectHome.cfm?projectId=50285
Final Rule on Public Use Limit on Commercial Dog Walking, Presidio	Presidio	Ruling on Park Uses	The Presidio Trust is imposing a public use limit on persons who are walking four or more dogs at one time in Area B of the Presidio of San Francisco (Presidio) for consideration (Commercial Dog Walkers). The limit will require any such Commercial Dog Walker in Area B to possess a valid commercial dog walking permit issued by NPS GGNRA. Commercial Dog Walkers will be allowed a maximum of six dogs at any one time. The GGNRA commercial dog walking permit requirement is a compendium amendment for all GGNRA sites in San Francisco and Marin Counties that allow dog walking, and is being implemented concurrently with the Trust's rule. Both are interim actions and will remain in effect until the final special regulation for dog walking in the GGNRA is adopted as anticipated in late 2015.	https://www.gpo.gov/fdsys/pkg/FR-2014-08-19/pdf/2014-19514.pdf
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.	https://www.nps.gov/goga/learn/nature/restoration-projects.htm
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

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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/park-improvements/current-projects/
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/firemanagement_wui.htm
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.	https://parkplanning.nps.gov/files/NL RTP_10-3.pdf

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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/oceancoastal/assets/docs/Ocean_Strategy_screen_June2007.pdf
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/oceancoastal/assets/docs/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.	https://www.nps.gov/goga/learn/management/upload/GGNRA-2020-Strategic-Plan-web.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.org/
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.parksforcalifornia.org/scorp
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

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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.	
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.	
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/programs/trails-forever/
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.	https://www.fws.gov/oregonfwo/articles.cfm?id=149489616
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

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
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.	http://www.marincounty.org/depts/cd/divisions/planning/2007-marin-countywide-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://www.sfwater.org/Modules/ShowDocument.aspx?documentID=4343
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.pedbikeinfo.org/pdf/PlanDesign_SamplePlans_Region_SFBayArea2009.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://ccag.ca.gov/wp-content/uploads/2014/07/CBPP_Main-Report__Sept2011_FINAL.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/Attachments/parks/Files/Parks%20Planning/Master%20Plans/Trails%20Master%20Plan.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
San Mateo Countywide Transportation Plan 2040	Regionwide	Transportation	The San Mateo Countywide Transportation Plan 2040 (SMCTP 2040) is a long-range, comprehensive transportation planning document. The current Countywide Transportation Plan, CTP 2010, was adopted in 2001. Since that time, the county's population and employment have increased substantially, several major transportation projects have been completed, and many policies have changed at the local, regional, state, and federal levels. The plan is intended to articulate clear transportation planning goals and objectives to promote consistency and compatibility among all transportation plans and programs within the county.	http://ccag.ca.gov/smctp2040/
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).	https://www.nps.gov/pore/learn/management/planning_dunerestoration_project.htm
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/history.html
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.	https://parkplanning.nps.gov/projectHome.cfm?projectId=15288
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. Erosion control measures for Ocean Beach are proposed as part of the Ocean Beach Master Plan.	http://www.spur.org/featured-project/ocean-beach-master-plan

Plans and Projects	Location	Type of Project	Purposes of the Project	Source
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/MSC_ID/179/MTO_ID/672
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://bairwmp.org/projects/vista-grande-drainage-basin-improvement-project
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	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.	http://www.sfgate.com/bayarea/article/Sharp-Park-Golf-Course-project-to-move-ahead-5150818.php

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
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.dot.ca.gov/dist4/calera-parkway/
Highway 1 Safety and Mobility Study	Pedro Point, Rancho Corral de Tierra	Transportation / highway improvement	<p>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.</p>	http://planning.smcgov.org/highway-1-safety-and-mobility-study
Midcoast Local Coastal Program	San Mateo County, Pacifica, near Rancho Corral de Tierra	Coastal Planning / Land Use	<p>Commitment: Redesign urban environment to increase vitality and reduce congestion. Preserve and provide access to natural environment.</p> <p>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.</p>	http://planning.smcgov.org/documents/local-coastal-program-lcp

APPENDIX L: AGENCY CONSULTATION

State Historic Preservation Office



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.

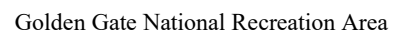
In the mean time, if you have any questions about this information or the Draft EIS, please contact Paul Scolari at paul_scolari@nps.gov, or 415-561-4963.

Sincerely,



Frank Dean
General Superintendent

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



**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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Cy: S. Smith
P. Scelari

RECEIVED
FEB 08 2011
SUPERINTENDENT'S OFFICE

February 4, 2011

In reply refer to: NPS110118B

Frank Dean
Superintendent
Golden Gate National Recreational Area
Fort Mason # 201
San Francisco, CA 94123

Re: Dog Management Plan, Golden Gate National Recreation Area, San Francisco and Marin Counties, CA

Dear Mr. Dean:

Thank you for your November 10, 2010, letter (received in this office January 18, 2011) requesting my review and comment with regard to the proposed undertaking at Golden Gate National Recreation Area (GGNRA). You are consulting with me in order to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation at 36 CFR Part 800. Along with your letter, you also submitted the Draft Dog Management Plan / Environmental Impact Statement (2 volumes) and the January 2011 GGNRA newsletter.

The proposed undertaking, as I understand it, involves the revision of the guidelines for dog walking in the park. The new Dog Management Plan would provide clear and enforceable policies with provisions for the protection and preservation of the park's cultural resources. GGNRA has prepared a Draft Environmental Impact Statement (DEIS) with six alternatives for public review and comment and used that documentation for the purposes of the first steps in the Section 106 consultation.

GGNRA has defined the Area of Potential Effect (APE) for this undertaking as seven non-contiguous areas within San Francisco and Marin Counties within park boundaries. The APE is based on the areas with cultural resources in locales for which dog management actions have been proposed.

While the APE contains a number of previously identified historic properties, GGNRA has focused its attention on the types of resources that erosion and ground disturbance can be caused or exacerbated by the presence of humans and their dogs. These include resources composed of or including features that are earthen and vegetative and vulnerable to effects of dog activity. These properties consist of three archaeological resources (CA-MRN-333, CA-SFR-5, and CA-SFR-21), all of which are listed on the National Register of Historic Places (NRHP) as well as seacoast fortifications and their integral earthworks and field fortifications, some of which are located within existing historic districts or landmarks.

The DEIS contains six alternatives, and while preferred alternatives have been identified for the various locations within the APE, GGNRA proposes to complete the public review/comment period for the DEIS before selecting an alternative for implementation. At that time, GGNRA will continue consultation with my office by assessing effects to historic resources by the chosen

alternative. However, GGNRA has made a preliminary determination that the effects will not be adverse.

Having reviewed the enormous report submitted for this consultation, I offer the following comments:

- I concur that this action qualifies as a federal undertaking as defined in 36 CFR 800.
- I concur that the APE is sufficient pursuant to 36 CFR 800.4.
- I concur with GGNRA's efforts to identify the known properties within the APE that are eligible for or listed on the NRHP.
- How does GGNRA intend to account for potential effects to unanticipated historic properties and for the treatment of such properties?
- I concur with GGNRA's plan to continue consultation on the assessment of effects following the public review / comment period for the DEIS.

Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Mark Beason, Project Review Unit historian, at (916) 445 - 7047 or at mbeason@parks.ca.gov.

Sincerely,

A handwritten signature in cursive script, reading "Susan H. Stratton for".

Milford Wayne Donaldson, FAIA
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)

SEP - 3 2013

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer
Office of Historic Preservation, Department of Parks and Recreation
1725 23rd Street, Suite 100
Sacramento, California 95816

Subject: Section 106 Consultation for the Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan / Supplemental Environmental Impact Statement

Dear Dr. Roland-Nawi:

The purpose of this letter is to inform you that a supplemental environmental impact statement (SEIS) has been prepared for Dog Management Plan to fully incorporate public comment received on the draft plan/EIS. The National Park Service (NPS) is continuing National Historic Preservation Act (NHPA) Section 106 consultation under 36 CFR 800 for this draft plan/SEIS and is seeking your concurrence with a final finding of effect. We are also continuing our efforts to consult with the Indians of Graton Rancheria and the Ohlone Representatives.

A letter was sent to your agency, the Federated Indians of Graton Rancheria, and the Ohlone Representatives, in January 2011, along with a copy of the draft GGNRA Dog Management Plan /Environmental Impact Statement (draft plan/EIS). We did not receive comments back from the tribes. Your response requested that GGNRA account for potential effects to unanticipated historic properties and the treatment of such properties. In response we have added a natural and cultural resource monitoring component to the Monitoring Based Management Plan, described below, which will allow a timely NPS response to any unanticipated effects, including documentation, protective measures and closures, if necessary.

Release of the draft plan/SEIS gives the NPS the opportunity to receive comment from the public on this new information before issuing a Notice of Proposed Rulemaking, the final plan/EIS and record of decision, and final rule.

To address substantive public comments on the draft plan/EIS, the NPS incorporated a number of changes to the draft plan/SEIS, including the following:

- The addition of new data (including additional law enforcement and visitor use data).
- The incorporation of new references.
- Additional *Americans with Disabilities Act* (ADA) information.

- Changes to the impacts analysis (including additional analysis of potential redistributive effects of opening/closing areas to dog walking).
- Changes to the compliance-based management strategy (now referred to as the monitoring-based management strategy) by including natural and cultural resource monitoring and removing automatic triggers and restrictions.
- Evaluation of additional fencing as a method to minimize dog walking impacts.
- Relatively minor changes to each site specific preferred alternative.
- A site recently transferred to GGNRA, Rancho Corral de Tierra (Rancho), was added to the park sites specifically addressed by the plan and a range of reasonable alternatives for the site was developed and is analyzed in this draft plan/SEIS.
- A description of how unanticipated historic properties would be protected.

The Monitoring-Based Management Plan would allow staff to monitor impacts to cultural resources, including unanticipated historic properties that may yet be discovered. Monitoring would include training to ensure recognition of previously unidentified sites, which are likely to primarily consist of indigenous sites or temporary military field fortifications. If unanticipated historic properties are discovered in dog walking areas, management actions would include documentation and assessment of significance, and implementation of protective measures. Your office would be contacted to concur in the identification of significant resources and the appropriate protective measures to undertake in order to ensure the long-term integrity of the site.

The draft plan/SEIS describes six alternatives at 22 sites (Figure 1), including the preferred alternative (Alternative F), for the management of dog walking activities at GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. Alternative F is the preferred alternative, and was altered in part in response to public comments received on the draft plan/EIS. Alternative F provides a variety of visitor use (no dogs, on-leash dog walking, and dog walking under voice and sight control in ROLAs [Regulated off Leash Areas]) as well as protection of natural resources, cultural resources, and visitor safety.

We have applied the criteria of adverse effect pursuant to 36 CFR 800.5(a) and have determined that the preferred alternative would have *no adverse effect* on cultural resources at any of the GGNRA sites, as described briefly below.

ARCHEOLOGICAL RESOURCES

Muir Beach and Lands End. Under the preferred alternative, only on-leash dog walking would be allowed on beaches and designated trails within the general areas where the Muir Beach (CA-MRN-333) and Lands End Point Lobos (CA-SFR-5; CA-SFR-21) archeological sites are located. As none of the three analyzed archeological sites is located within or close to where dog walking is allowed at Muir Beach and Lands End, they are not expected to incur any dog-related impacts. Additionally, these three archeological sites are considered relatively stable and their conditions are monitored periodically by park staff. Under this alternative, these on-leash requirements provide considerable protection from adverse dog-related activity at these cultural resources and result in a negligible impact to the park's archeological resources. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

HISTORIC STRUCTURES

Permanent Seacoast Fortifications and Their Integral Earthworks (Fort Mason, Fort Point, Fort Miley, Fort Baker, Fort Funston). Under the preferred alternative, dog walking would be allowed near areas of sensitive earthwork portions of seacoast fortifications, including the Fort Mason Historic District and Fort Point (Presidio NHL). However, only on-leash dog walking would be allowed at Fort Point and in the majority of Fort Mason under the preferred alternative. The Fort Mason Historic District contains some large common areas (Great Meadow and parade ground), trails and parking lots. These on-leash areas do not include direct access to the earthwork portions of the seacoast fortifications. Under the preferred alternative, a ROLA is proposed at Fort Mason on the Laguna Green, far from the fortifications, near the southwestern boundary, but either fencing or a vegetative barrier would be installed at the ROLA. On-leash dog walking is also proposed in general areas where seacoast fortifications and their integral earthworks are located at Fort Miley Military Reservation, Fort Baker (Forts Baker, Barry, and Cronkhite Historic District), and Fort Funston. The Fort Miley area includes a trail and picnic and parking areas but does not include direct access to the earthwork portions of seacoast fortifications. On-leash dog walking is proposed along trails and on the parade ground at Fort Baker, none of which offer direct access to seacoast fortifications in the area although one section of trail, the Battery Yates Loop Road, is adjacent to a battery. At Fort Funston, dog walking is restricted to on-leash trails or ROLAs, all of which restrict access to cultural resources at Battery Davis. Fort Funston was removed from the NRHP in 2006 due to resource degradation related to erosion and human use to the point where the site lacked integrity, except for Battery Davis. Battery Davis was singled out for eventual inclusion in a National Historical Landmark District for seacoast fortifications of San Francisco Bay, which is currently being prepared. The proposals under the preferred alternative (on-leash, ROLAs located away from sensitive resources, fencing/barrier proposed at the Fort Mason ROLA, etc.) for Forts Mason, Point, Miley, Baker, and Funston would provide protection of these fragile resources by reducing the potential for dog-related trampling and ground disturbance. Under the preferred alternative, negligible to beneficial impacts to the park's historic structures would occur. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

Crissy Airfield. A ROLA is proposed for the eastern portion of Crissy Airfield under the preferred alternative. Currently, dogs under voice control are allowed at Crissy Airfield with no apparent signs of impacts. A 1921 signal cable hut (building 946) near the airfield is currently partially buried and fenced-off and appears unaffected by dog activity. It is expected that with the prohibitions of dogs under voice control in many areas of the park, ROLAs (including at Crissy Field) would become more heavily used by visitors looking for areas to run dogs under voice and sight control. Over time, the actions proposed under the preferred alternative at Crissy Airfield (ROLA) are expected to result in negligible to long-term, minor, site-specific, adverse impacts to cultural resources related to trampling and ground disturbance. For purposes of Section 106 of the NHPA, the assessment would be *no adverse effect*.

CULTURAL LANDSCAPES

Fort Mason Historic District. Cultural resources located within the Fort Mason Historic District that contribute to its significance and could be affected by dog management actions

include earthwork portions of seacoast fortifications (Battery Burnham and Black Point Battery). Under the preferred alternative, only on-leash dog walking would be allowed in parking and common areas (sidewalks, Great Meadow, etc.). As mentioned under Historic Structures, a ROLA is proposed at Fort Mason on the Laguna Green, but either fencing or a vegetative barrier would be installed. The restriction of on-leash dog walking for the majority of Fort Mason and the fencing/barrier proposed at the ROLA would minimize the potential for dog-related trampling and ground disturbance to these cultural resources and would result in a negligible impact to the Historic District. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

Forts Baker, Barry and Cronkhite Historic District. Cultural resources that contribute to the National Register status of the Forts Baker, Barry and Cronkhite Historic District, and which could be affected by dog management actions include earthwork portions of seacoast fortifications (as described above) at Fort Baker and field fortifications. Negligible to beneficial impacts to the earthwork portions of seacoast fortifications are expected; for Section 106, the assessment is *no adverse effect* (see Historic Structures analysis above).

Military Field Fortifications. Under the preferred alternative, dogs would be prohibited from all Marin Headland trails in the area where the majority of the fragile field fortifications, such as foxholes, trenches and weapons pits are located. Eliminating dog activity from this area is considered a positive step in the preservation of these resources related to the decreased potential for ground disturbance resulting in a localized benefit to the park's cultural resources. For purposes of Section 106 of the NHPA, the assessment would be *no adverse effect*. Under the preferred alternative, on-leash dog walking would be allowed at Fort Baker on-trail and on the parade ground, away from the earthwork portions of seacoast fortifications (see Historic Structures analysis above). Collectively this would prevent dog-related trampling and ground disturbance to these fragile resources resulting in negligible to beneficial impacts to the Forts Baker, Barry, and Cronkhite Historic District. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

Presidio of San Francisco NHL. The NRHP status of the Presidio NHL is related to its numerous contributing historic, architectural and archeological resources associated with important events in American history. Contributing cultural resources located within the Presidio NHL that would be affected by the plan include field fortifications (Fort Scott), the U.S. Coast Guard Station (USCGS) Historic District, earthwork portions of seacoast fortifications, and Crissy Airfield. Negligible to beneficial impacts to earthwork portions of seacoast fortifications, and negligible to long-term, minor adverse impacts to Crissy Airfield are expected under the preferred alternative; for Section 106, the assessment would be *no adverse effect* (see Historic Structures analysis above).

Military Field Fortifications. These fragile resources are located primarily along a coastal area from Baker Beach north to the Golden Gate Bridge within Fort Scott. Under the preferred alternative, dog walking on-leash would only be allowed along the beach, many trails, and the picnic area and parking lots at Baker Beach; dogs would be prohibited on the Batteries to Bluffs and Battery Crosby Trails. This area is one of high cultural sensitivity with numerous field fortifications present, particularly in the vicinity of Batteries Chamberlin, Crosby and Godfrey. The field fortifications have been constructed in sandy/unstable soils and are considered fragile. As a result, ground disturbance can result in erosion and negative impacts to these resources. Restricting dogs to on-leash near Battery Chamberlin and prohibiting dogs on the Batteries to Bluffs and Battery Crosby Trails would minimize the potential for

trampling and ground disturbance in areas on/around cultural resources resulting in a benefit to the park's cultural resources. For purposes of Section 106 of the NHPA, the assessment would be *no adverse effect*.

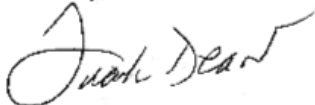
U.S. Coast Guard Station Historic District. Under this alternative, on leash dog walking would be allowed along the promenade (Crissy Field) on the southern border of the Historic District and on the lawns and paved public road adjacent to the old Coast Guard buildings. Vegetation that helps to define the original formal design and the edges of the property has been negatively affected in the past by dogs (urination killing vegetation), many of which are dogs under voice control. On-leash requirements under the preferred alternative are expected to marginally improve the existing conditions and thus result in a negligible impact to the historic district. For purposes of Section 106 of the NHPA, the assessment would be *no adverse effect*.

Fort Miley Military Reservation. Cultural resources located within the Fort Miley Military Reservation that contribute to its significance and could be affected by dog management actions include earthwork portions of seacoast fortifications (Batteries Chester, Livingston-Springer, BC #243). Under the preferred alternative, on-leash dog walking is proposed only along a trail on the east side of the military reservation. The overall impacts to the larger Fort Miley Military Reservation would be negligible. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

Rancho Corral de Tierra. This site may be potentially eligible for listing on the NRHP for ties to the history of ranching operations dating back to the Mexican rancho era. This site includes landscapes features, structures, and archeological sites, including the Francisco Guerrero Adobe Site, and the Martini Creek Ohlone sites (NPS 2011b, 105). The continued requirement of on-leash dog walking to trails in two specific areas of this site and prohibiting dog walking throughout the rest of the site would result in a negligible impact to these resources. For purposes of Section 106 of the NHPA, assessment would be *no adverse effect*.

At this point in time, we are seeking your concurrence with a final finding of effect. If you have any questions regarding this request please contact Park Historian Stephen Haller at (415) 561-4935, or email at stephen_haller@nps.gov. We look forward to your response and we thank you for your consideration.

Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

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

Attachment: Figure 1 – Vicinity Map



**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
caahpo@parks.ca.gov
www.ohp.parks.ca.gov

RECEIVED
OCT 30 2013
SUPERINTENDENT'S OFFICE

S. Smith
Cy: F. Dean
H. Smith
A. Fisher



In reply refer to: NPS110118B

October 28, 2013

Frank Dean
Superintendent
Golden Gate National Recreational Area
Fort Mason # 201
San Francisco, CA 94123

Re: Dog Management Plan, Golden Gate National Recreation Area, San Francisco and Marin Counties, CA

Dear Mr. Dean:

Thank you for your September 3, 2013, letter continuing consultation with regard to the proposed undertaking at Golden Gate National Recreation Area (GGNRA). The National Park Service (NPS) is consulting with the State Historic Preservation Officer (SHPO) in order to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation at 36 CFR Part 800.

According to your letter, NPS has prepared a Supplemental Environmental Impact Statement (SEIS) to incorporate and address public comments received on the draft Dog Management Plan / EIS. NPS received no comments from tribes but continues its efforts to consult with the Federated Indians of Graton Rancheria and the Ohlone Representatives.

In response to the SHPO's comment letter, dated February 4, 2011, NPS has added a natural and cultural resource monitoring component to the Monitoring Based Management Plan to allow timely responses to unanticipated effects, including documentation, protective measures, and closures, if necessary.

The preferred alternative for the management of dog walking activities in the Golden Gate National Recreation Area (GGNRA) provides a variety of visitor use in combination with protection of natural resources, cultural resources, and visitor safety. NPS proposes a Finding of No Adverse Effect for this alternative based upon either prohibitions of dog walking or restrictions to on-leash use in areas with known historic properties, such as:

- Archaeological resources near Muir Beach and Lands End;
- Permanent Seacoast Fortifications at Forts Mason, Point, Milby, Baker, and Funston;
- Crissy Airfield;
- Fort Mason Historic District;
- Forts Baker, Barry, and Cronkhite Historic District;
- Presidio of San Francisco National Historic Landmark;
- U.S. Coast Guard Station Historic District;
- Fort Milby Military Reservation; and

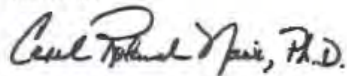
- Rancho Connal de Tierra.

After reviewing this information, the SHPO offers the following comments:

- The Monitoring Based Management Plan is a good instrument to account for potential effects to unanticipated historic properties and for the treatment of such properties.
- However, it is unclear what is meant by "removing automatic triggers and restrictions," found on page 2 of your letter. Presumably, the adoption of a monitoring-based plan replaces automatic triggers, but this is not explained in much detail. Please provide further information regarding this aspect of the plan.
- The SHPO concurs with a Finding of No Adverse Effect for this undertaking.
- In the event that NPS decides to install additional fencing to protect resources, that decision should trigger consultation with the SHPO given the ground disturbance involved.
- Please be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, you may have future responsibilities for this undertaking under 36 CFR Part 800.

Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Mark Beason, Project Review Unit historian, at (916) 445 - 7047 or at mark.beason@parks.ca.gov.

Sincerely,



Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer

Tribal Consultation Letters



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-SUPT)

SEP - 3 2013

Andrew Galvan
The Ohlone Indian Tribe
P.O. Box 3152
Mission San Jose, CA 94539

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental Environmental Impact Statement

Dear Mr. Galvan:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

Executive Order 13175, federal regulations (36 CFR 800.2) implementing Section 106 of the National Historic Preservation Act of 1966, as amended, and NPS Management Policies all require consultation with federally recognized American Indian tribes on a government-to-government basis, while NPS Management Policies also require consultation with other traditionally associated groups. You have previously been informed about this project through our park's newsletter, *Native Update*, and through copies of correspondence between the NPS and the State Historic Preservation Officer (SHPO), opening consultation under Section 106 of the National Historic Preservation Act of 1966, as amended. In our continuing effort to reach out to Native people, I am writing to update you on the project and to inquire if you desire to consult with the NPS regarding this planning effort. Staff at GGNRA are available to discuss the project with you in more detail if that would be helpful. We have also reached out by letter to the Federated Indians of Graton Rancheria, in which you were copied.

This draft plan/SEIS 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

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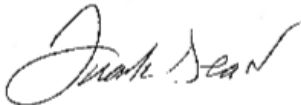
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The objectives of the Plan/SEIS include:

- Preserve and protect natural and cultural resources and natural processes
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If you wish to consult with the NPS regarding this project, please write to the address above or contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your consideration.

Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
Federated Indians of Graton Rancheria
Ohlone Representatives

Attachment:

Figure 1 – Vicinity Map



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-SUPT)

SEP -3 2013

Anthony Miranda
1312 S. Magnolia Ave.
Monrovia, CA 91016

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental Environmental Impact Statement

Dear Mr. Miranda:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

Executive Order 13175, federal regulations (36 CFR 800.2) implementing Section 106 of the National Historic Preservation Act of 1966, as amended, and NPS Management Policies all require consultation with federally recognized American Indian tribes on a government-to-government basis, while NPS Management Policies also require consultation with other traditionally associated groups. You have previously been informed about this project through our park's newsletter, *Native Update*, and through copies of correspondence between the NPS and the State Historic Preservation Officer (SHPO), opening consultation under Section 106 of the National Historic Preservation Act of 1966, as amended. In our continuing effort to reach out to Native people, I am writing to update you on the project and to inquire if you desire to consult with the NPS regarding this planning effort. Staff at GGNRA are available to discuss the project with you in more detail if that would be helpful. We have also reached out by letter to the Federated Indians of Graton Rancheria, in which you were copied.

This draft plan/SEIS 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 continue to escalate if not addressed in a comprehensive plan/SEIS.

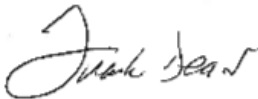
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If you wish to consult with the NPS regarding this project, please write to the address above or contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your consideration.

Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
Federated Indians of Graton Rancheria
Ohlone Representatives

Attachment:

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United States Department of the Interior

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

IN REPLY REFER TO:
L76 (GOGA-SUPT)

SEP - 3 2013

Greg Sarris, Chairman
Federated Indians of Graton Rancheria
6400 Redwood Dr. #300
Rohnert Park, CA 94928-2341

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental Environmental Impact Statement

Dear Chairman Sarris:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

Executive Order 13175, federal regulations (36 CFR 800.2) implementing Section 106 of the National Historic Preservation Act of 1966, as amended, and NPS Management Policies all require consultation with federally recognized American Indian tribes on a government-to-government basis. You have previously been informed about this project through our park's newsletter, *Native Update*, and through copies of correspondence between the NPS and the State Historic Preservation Officer (SHPO), opening consultation under Section 106 of the National Historic Preservation Act of 1966, as amended. In our continuing effort to reach out to Native people in this planning effort, I am writing to update you about this project and to again inquire if the Federated Indians of Graton Rancheria desire to consult with the NPS regarding the proposed project. Staff at GGNRA are available to discuss the project with you in more detail if that would be helpful. We are also reaching out to the Ohlone Representatives, in which letters you were copied.

This draft plan/SEIS 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

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If the Federated Indians of Graton Rancheria wish to consult with the NPS regarding this project, please write to the address above or contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your consideration.

Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
Ohlone Representatives

Attachment:
Figure 1 -- Vicinity Map





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-SUPT)

SEP - 3 2013

Irene Zwierlein, Chairperson
Amah Mutsun Band of Ohlone Costanoan Indians
789 Canada Road
Woodside, CA 94062

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental
Environmental Impact Statement

Dear Chairperson Zwierlein:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

Executive Order 13175, federal regulations (36 CFR 800.2) implementing Section 106 of the National Historic Preservation Act of 1966, as amended, and NPS Management Policies all require consultation with federally recognized American Indian tribes on a government-to-government basis, while NPS Management Policies also require consultation with other traditionally associated groups. You have previously been informed about this project through our park's newsletter, *Native Update*, and through copies of correspondence between the NPS and the State Historic Preservation Officer (SHPO), opening consultation under Section 106 of the National Historic Preservation Act of 1966, as amended. In our continuing effort to reach out to Native people, I am writing to update you on the project and to inquire if you desire to consult with the NPS regarding this planning effort. Staff at GGNRA are available to discuss the project with you in more detail if that would be helpful. We have also reached out by letter to the Federated Indians of Graton Rancheria, in which you were copied.

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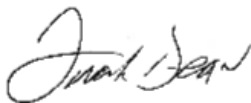
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Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
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Ohlone Representatives

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Figure 1 – Vicinity Map





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-SUPT)

SEP - 3 2013

Jakki Kehl
720 North 2nd Street
Patterson, CA 95363

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental
Environmental Impact Statement

Dear Ms. Kehl:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

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Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
Federated Indians of Graton Rancheria
Ohlone Representatives

Attachment:
Figure 1 – Vicinity Map





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-SUPT)

SEP - 3 2013

Linda Yamane
1585 Mira Mar Ave.
Seaside, CA 93955

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental
Environmental Impact Statement

Dear Ms. Yamane:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

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Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
Federated Indians of Graton Rancheria
Ohlone Representatives

Attachment:

Figure 1 – Vicinity Map





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-SUPT)

SEP - 3 2013

Louise Miranda Ramirez, Chairperson
Ohlone/Costanoan-Esselen Nation
P.O. Box 1301
Monterey, CA 93942

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental
Environmental Impact Statement

Dear Chairperson Ramirez:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

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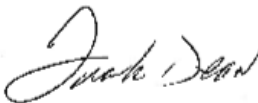
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NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:
L76 (GOGA-SUPT)

SEP - 3 2013

Patrick Orozco
Costanoan Ohlone Rumsen-Mutsun Tribe
644 Pear Tree Drive
Watsonville, CA 95075

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental Environmental Impact Statement

Dear Mr. Orozco:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

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Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
Federated Indians of Graton Rancheria
Ohlone Representatives

Attachment:
Figure 1 – Vicinity Map





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-SUPT)

SEP - 3 2013

Ramona Garibay, Representative
Trina Marine Ruano Family
5816 Thornton Ave.
Newark, CA 94560

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental
Environmental Impact Statement

Dear Representative Garibay:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

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Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
Federated Indians of Graton Rancheria
Ohlone Representatives

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Figure 1 – Vicinity Map





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-SUPT)

SEP - 3 2013

Rico Miranda
1830 108th Ave.
Oakland, CA 94603

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental Environmental Impact Statement

Dear Mr. Miranda:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

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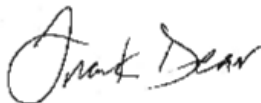
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cc: State Historic Preservation Officer
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NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:
L76 (GOGA-SUPT)

SEP - 3 2013

Rosemary Cambra, Chairperson
Muwekma Ohlone Indian Tribe
2151 Oakland Road
San Jose, CA 95131

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental Environmental Impact Statement

Dear Chairperson Cambra:

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cc: State Historic Preservation Officer
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Figure 1 – Vicinity Map





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-SUPT)

SEP - 3 2013

Tony Cerda, Chairman
Costanoan-Rumsen Carmel Tribe
240 East First Street
Pomona, CA 91766

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental
Environmental Impact Statement

Dear Chairman Cerda:

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cc: State Historic Preservation Officer
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Figure 1 – Vicinity Map





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

IN REPLY REFER TO:
L76 (GOGA-SUPT)

SEP - 3 2013

Valentin Lopez, Chairman
Amah Mutsun Tribal Band
3015 Eastern Ave. #40
Sacramento, CA 95821-4250

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental
Environmental Impact Statement

Dear Chairman Lopez:

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The objectives of the Plan/SEIS include:

- 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

If you wish to consult with the NPS regarding this project, please write to the address above or contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your consideration.

Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
Federated Indians of Graton Rancheria
Ohlone Representatives

Attachment:

Figure 1 – Vicinity Map





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-SUPT)

SEP - 3 2013

Ann Marie Sayers
Indian Canyon Mutsun Band of Costanoan
P.O. Box 28
Hollister, CA 95024

Subject: Golden Gate National Recreation Area (GGNRA) Dog Management Plan / Supplemental Environmental Impact Statement

Dear Ms. Sayers:

The National Park Service (NPS) has prepared a Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. The draft plan/SEIS describes alternatives for dog walking activities at 22 sites within GGNRA managed lands, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The draft plan/SEIS will be available for public comment at <http://parkplanning.nps.gov/dogplan>.

Executive Order 13175, federal regulations (36 CFR 800.2) implementing Section 106 of the National Historic Preservation Act of 1966, as amended, and NPS Management Policies all require consultation with federally recognized American Indian tribes on a government-to-government basis, while NPS Management Policies also require consultation with other traditionally associated groups. You have previously been informed about this project through our park's newsletter, *Native Update*, and through copies of correspondence between the NPS and the State Historic Preservation Officer (SHPO), opening consultation under Section 106 of the National Historic Preservation Act of 1966, as amended. In our continuing effort to reach out to Native people, I am writing to update you on the project and to inquire if you desire to consult with the NPS regarding this planning effort. Staff at GGNRA are available to discuss the project with you in more detail if that would be helpful. We have also reached out by letter to the Federated Indians of Graton Rancheria, in which you were copied.

This draft plan/SEIS 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 continue to escalate if not addressed in a comprehensive plan/SEIS.

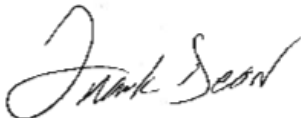
The purpose of the draft plan/SEIS is to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the Golden Gate National Recreation Area (GGNRA). The draft plan/SEIS describes six alternatives at 22 sites, including the preferred alternative (alternative F), for the management of dog walking activities at GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. 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; visitor experience; consultation with federal and state agencies; and the Federal Panel Recommendations on Dog Walking to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. However, the plan/SEIS 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 22 sites under consideration for this plan/SEIS and the project area are shown in the attached Figure 1.

The objectives of the Plan/SEIS include:

- 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

If you wish to consult with the NPS regarding this project, please write to the address above or contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your consideration.

Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

cc: State Historic Preservation Officer
Federated Indians of Graton Rancheria
Ohlone Representatives

Attachment:
Figure 1 – Vicinity Map




U.S. Environmental Protection Agency

PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 4691

Author Information

Keep Private: No
Name: Kathleen Martyn Goforth
Organization: US EPA Region IX  Official Rep.
Organization Type: F - Federal Government
Address: 75 Hawthorne St
San Francisco, CA 94105
USA

E-mail:

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 05/27/2011 Date Received: 05/31/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Letter
Notes: Attachment enclosed

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



United States Department of the Interior

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

IN REPLY REFER TO:
L76 (GOGA-SUPT)

SEP - 5 2013

Kathleen Martyn Goforth
Environmental Review Office Manager
Communities and Ecosystem Division
75 Hawthorne Street
San Francisco, California 94105

Subject: USEPA Region IX Review of the Golden Gate National Recreation Area (GGNRA) Draft
Dog Management Plan / Supplemental Environmental Impact Statement (CEQ #20110004)

Dear Ms. Goforth:

Attached please find the Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS). NPS will be seeking your review pursuant to Section 309 of the Clean Air Act.

A letter was sent to your agency in January 2011, along with a copy of the draft GGNRA Dog Management Plan/Environmental Impact Statement (draft plan/EIS). The purpose of this letter is to inform you that a supplemental EIS (SEIS) has been prepared for this project to fully incorporate public comment received on the draft plan/EIS, and to respond to your letter dated 27 May 2011, wherein the draft plan/EIS was rated: "Environmental Concerns – Insufficient Information." Release of the draft plan/SEIS gives the National Park Service (NPS) the opportunity to both respond to your input and to receive comment from the public on this new information before issuing a Notice of Proposed Rulemaking, the final plan/EIS and record of decision, and final rule.

To address the substantive agency and public comments on the draft plan/EIS, the NPS incorporated a number of changes to the draft plan/SEIS, including the following:

- The addition of new data (including additional law enforcement and visitor use data).
- The incorporation of new references.
- Additional *Americans with Disabilities Act* (ADA) information.
- Changes to the impacts analysis (including additional analysis of potential redistributive effects of opening/closing areas to dog walking).
- Changes to the compliance-based management strategy (now referred to as the monitoring-based management strategy) by including natural and cultural resource monitoring and removing automatic triggers and restrictions.
- Evaluation of additional fencing as a method to minimize dog walking impacts.

- Relatively minor changes to each site specific preferred alternative.
- A site recently transferred to GGNRA, Rancho Corral de Tierra (Rancho), was added to the park sites specifically addressed by the plan and a range of reasonable alternatives for the site was developed and is analyzed.

In response to the EPA rating of "Environmental Concerns – Insufficient Information," a new section was added in both Chapters 3 and 4 of the draft plan/SEIS to describe in more detail the nearby dog walking areas (located outside of GGNRA) that may experience the effects of redistribution as a result of the draft plan/SEIS. The NPS conducted a survey in the summer of 2012 (*GGNRA Dog Walking Satisfaction Visitor Study*) to evaluate the potential for redistribution of users due to access changes resulting from implementation of a new dog management regulation for GGNRA. GGNRA used the best available data to determine where GGNRA visitors may go as a result of the draft plan/SEIS and the impacts associated with this redistribution, evaluating dog walking areas outside of GGNRA where dog walkers may be more likely to relocate. A total of 18 nearby dog walking areas that visitors would likely relocate to were analyzed in the draft plan/SEIS; existing resources at each of these nearby areas are included in Chapter 3. Impacts to natural resources, visitor experience, visitor safety, and park operations (maintenance and cost) for each of these sites are included when applicable in the analysis for each alternative in Chapter 4 of the draft plan/SEIS.

The draft plan/SEIS describes six alternatives at 22 sites, including the preferred alternative (alternative F), for the management of dog walking activities at GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. Alternative F is the preferred alternative, and was altered in part in response to public comments received on the draft plan/EIS. Alternative F provides a variety of visitor use (no dogs, on-leash dog walking, and dog walking under voice and sight control in ROLAs) as well as protection of natural resources, cultural resources, and visitor safety.

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 regarding on and off leash dog walking to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. However, the draft plan/SEIS 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 22 sites under consideration for this plan/SEIS and the project area are shown in the attached Figure 1.

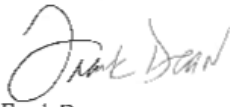
The objectives of the Plan/SEIS include:

- Provide a clear, enforceable dog management policy
- 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

This draft plan/SEIS 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 and litigation, have compromised visitor and NPS employee safety, affected visitor experience and resulted in resource degradation. These conflicts will likely continue to escalate if not addressed in a comprehensive plan/EIS.

If you have any questions regarding this request for review and rating please contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your review.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frank Dean", is written above the typed name.

Frank Dean
General Superintendent
Golden Gate National Recreation Area

Attachment:

Figure 1 – Vicinity Map





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
75 Hawthorne Street
San Francisco, CA 94105

JAN 21 2014
RECEIVED
JAN 23 2014
SUPERINTENDENT'S OFFICE

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

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

Dear Mr. Dean:

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Martyn Goforth".

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

Enclosures: Summary of EPA Rating Definitions

#13

SUMMARY OF EPA RATING DEFINITIONS*

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

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

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

"EC" (Environmental Concerns)

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

"EO" (Environmental Objections)

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

"EU" (Environmentally Unsatisfactory)

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

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

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

"Category 2" (Insufficient Information)

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

"Category 3" (Inadequate)

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

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

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.

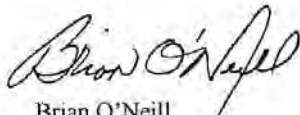
In this letter we are following up on Kim's suggestion that we continue the informal consultation process by enclosing for your review both 1) information on threatened and endangered species occurrence in the project area that we have gathered from the U.S. Fish and Wildlife Service website and from 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,



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 myrtilae

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.



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.

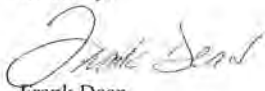
NPS recognizes that the public may not comply with the preferred alternative as described. To ensure resources, visitors and park staff are protected and that compliance with the CFR applicable to dog management is high, NPS has included a compliance-based management plan. If non-compliance occurs at 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.



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-SUPT)

SEP - 5 2013

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

Subject: Section 7 Consultation for the Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan / Supplemental Environmental Impact Statement

Dear Ms. Knight:

Attached please find applicable excerpts of the draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS). The NPS is seeking concurrence from your agency that the Plan to be implemented is not likely to adversely affect species or habitat protected under the Endangered Species Act, as amended.

In January 2011, the NPS sent a letter to your agency along with applicable excerpts of the draft Golden Gate National Recreation Area (GGNRA) Dog Management Plan/Environmental Impact Statement (draft plan/EIS). The purpose of this letter is to inform you that a supplemental EIS (SEIS) has been prepared for this project to fully incorporate public comment received on the draft plan/EIS. Release of the SEIS gives the National Park Service (NPS) the opportunity to receive comment from the public on this new information before the NPS issues a Notice of Proposed Rulemaking, the final plan/EIS and record of decision, and final rule.

To address substantive public comments on the draft Plan/EIS, the NPS incorporated a number of changes to the plan/SEIS, which include the following:

- The addition of new data (including additional law enforcement and visitor use data)
- The incorporation of new references
- Additional *Americans with Disabilities Act* (ADA) information
- Changes to the impacts analysis (including additional analysis of potential redistributive effects of opening/closing areas to dog walking)
- Changes to the compliance-based management strategy (now referred to as the monitoring-based management strategy) by including natural and cultural resource monitoring and removing automatic triggers and restrictions
- Evaluation of additional fencing as a method to minimize dog walking impacts
- Minor changes to each site specific preferred alternative
- Addition of listed plant species under your jurisdiction

- A site recently transferred to GGNRA, Rancho Corral de Tierra (Rancho), was added to the park sites specifically addressed by the plan and a range of reasonable alternatives for the site was developed and is analyzed in this draft plan/SEIS; an evaluation of listed species at this site under your jurisdiction was added to the analysis of this site

The draft plan/SEIS describes six alternatives at 22 sites, including the preferred alternative (alternative F), for the management of dog walking activities at GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. Alternative F is the preferred alternative, and was altered in part in response to public comments received on the draft plan/EIS. Alternative F provides a variety of visitor uses (no dogs, on-leash dog walking, and dog walking under voice and sight control in ROLAs) as well as protection of natural resources, cultural resources, and visitor safety.

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; visitor experience; consultation with tribes and federal and state agencies; and the Federal Panel Recommendations on Dog Walking to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. However, the draft plan/SEIS 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 22 sites under consideration for this draft plan/SEIS and the project area are shown in the attached Figure 1.

This draft plan/SEIS 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. These conflicts will likely continue to escalate if not addressed in a comprehensive plan/EIS.

Habitat used by federally threatened or endangered species may be vulnerable to impacts from intensive use of public areas by humans and dogs. There are over 80 rare or special-status wildlife and plant 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 draft plan/SEIS are discussed in this document. Of the 80 listed wildlife and plant species, 19 are state and/or federally listed and have a detailed impacts analysis in this draft plan/SEIS (see enclosed Table 1). This draft plan/SEIS includes analysis for three listed plant species that were not included in the draft plan/EIS: marsh sandwort (*Arenaria paludicola*) found in the Marin Headlands, Franciscan manzanita (*Arctostaphylos franciscana*) at Fort Point and Baker Beach, and Presidio clarkia (*Clarkia franciscana*) at Baker Beach. Also, an analysis for California seablite (*Sumeda californica*) was originally included in the draft plan/EIS, but this plant has since been removed from further analysis due to extirpation within GGNRA. As stated above, a new site within GGNRA, Rancho Corral de Tierra, has been added to the draft plan/SEIS. The following listed species are analyzed for Rancho Corral de Tierra: mission blue butterfly (*Icaricia icarioides* ssp. *missionensis*), Central California Coast (CCC) steelhead (*Oncorhynchus mykiss*) distinct population segment (DPS), California red-legged frog (*Rana draytonii*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), and Hickman's potentilla (*Potentilla hickmanii*). The changes stated above represent new text for the review of your

agency. Please note that the preferred alternative for the newly added species and sites described above is "not likely to adversely affect" either the plant, invertebrate, or animal species.

In our preparation of the draft plan/SEIS, we have analyzed the potential impacts of six alternatives including, the no action alternative and the preferred alternative, on listed aquatic and marine species occurring and potentially present within the 22 sites of GGNRA selected for dog management. Because the draft plan/SEIS is a very large document we have attached excerpted applicable sections of the draft plan/SEIS 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.

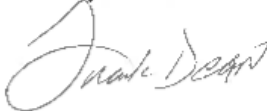
The monitoring-based management strategy (MMS) (formerly the Compliance-Based Management Strategy) has been designed to encourage compliance with sections of the Code of Federal Regulations (CFR) applicable to dog management, and ensure protection of park resources, visitors and staff. The MMS will provide the framework for monitoring and recording observed noncompliance with the applicable sections of the CFR, including the new 36 CFR Part 7 special regulation for dog management, and will guide use of park resources to address those violations. Noncompliance with federal regulations related to dog management will be met with a range of management responses. The MMS will also monitor for impacts to natural and cultural resources. The monitoring-based management strategy has been changed from the draft plan/EIS to remove a strict threshold for compliance that would trigger a change to more restrictive management. Monitoring of natural and cultural resources, not just compliance with existing regulations, is a new requirement. This change will allow the NPS to weigh violations within the context of an area. For example, disturbance of threatened and endangered (T&E) species and habitat would be a high priority for management to address. This information will guide the park in the future if additional restrictions become necessary. Law enforcement will continue to issue citations for individual violations. Additionally, monitoring data will provide law enforcement with information on where to prioritize these efforts.

We have concluded that the preferred alternative for the selected 22 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 respond in writing within 60 days from the date of receipt, or no later than the close of the public comment period on the draft plan/SEIS, if you do or do not concur with our assessment.

If, based on comments received during public review of the draft plan/SEIS, the NPS determines that the preferred alternative should be altered or amended, the 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 Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov.

Sincerely,



Frank Dean
General Superintendent
Golden Gate National Recreation Area

Enclosures:

Table 1 – Federally and State-listed Species Considered in the Draft Plan/SEIS

Figure 1 – Vicinity Map

TABLE 1. FEDERALLY AND STATE-LISTED SPECIES CONSIDERED IN THE DRAFT PLAN/SEIS

Group	Scientific Name	Common Name	Federal Status ^a	State Status ^a	GGNRA Location of Mapped Occurrence or Potential Habitat
Invertebrate	<i>Callophrys mossii bayensis</i>	San Bruno elfin butterfly	FE	—	Milagra Ridge
Invertebrate	<i>Icaricia icarioides ssp. missionensis</i>	Mission blue butterfly	FE	—	Alta Trail / Orchard Fire Road / Pacheco Fire Road, Oakwood Valley, Marin Headlands Trails (Tennessee Valley), Fort Baker, Milagra Ridge, and Sweeney Ridge / Cattle Hill, and Rancho Corral de Tierra
Fish	<i>Eucyclogobius newberryi</i>	Tidewater goby	FE, CH	—	Rodeo Beach (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	—	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 (Denniston Creek and Martini Creek)
Amphibian	<i>Rana draytonii</i>	California red-legged frog	FT, CH	—	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
Reptile	<i>Thamnophis sirtalis tetrataenia</i>	San Francisco garter snake	FE	SE	Mori Point, Milagra Ridge, Sweeney Ridge / Cattle Hill, Pedro Point, and Rancho Corral de Tierra
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, and Marin Headlands Trails
Mammal	<i>Arctocophalus townsendi</i>	Guadalupe fur seal	FT	ST	Potential stranding on all beach areas
Mammal	<i>Eumetopias jubatus</i>	Steller sea lion	FT, CH ^b	—	Potential stranding on all beach areas
Plant	<i>Arenaria paludicola</i>	Marsh sandwort	FE	SE	Marin Headlands Trails
Plant	<i>Arctostaphylos franciscana</i>	Franciscan manzanita	FE	—	Fort Point and Baker Beach
Plant	<i>Arctostaphylos hookeri ssp. ravenii</i>	Presidio (Raven's) Manzanita	FE	SE	Baker Beach
Plant	<i>Clarkia franciscana</i>	Presidio Clarkia	FE	—	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	Baker Beach and Fort Funston
Plant	<i>Potentilla hickmanii</i>	Hickman's potentilla (Hickman's cinquefoil)	FE	SE	Mori Point, Pedro Point, and Rancho Corral de Tierra

^a FE = federally endangered, FT = federally threatened, CH = critical habitat, SE = state endangered, ST = state threatened.
^b = Critical habitat has been designated for this species, but the critical habitat does not occur in GGNRA.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Carriage Way, Suite W-2605
Sacramento, California 95825-1846

In Reply Refer
to:
081-SMF00-
2011-TA-0179-2

RECEIVED

JUL 16 2014

JUL 18 2014

Memorandum

SUPERINTENDENT'S OFFICE

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

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

Subject: Comments on the Golden Gate National Recreation Area Draft Dog Management Plan / Supplemental Environmental Impact Statement

The U.S. Fish and Wildlife Service's (Service) Sacramento Fish and Wildlife Office is providing comments on the Fall 2013 *Draft Dog Management Plan / Supplemental Environmental Impact Statement* (Draft Plan/SEIS) for the 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). On September 9, 2013, the U.S. Fish and Wildlife Service (Service) received your September 5, 2013 letter transmitting the Draft Plan/SEIS and requesting concurrence that the Draft Plan/SEIS is not likely to adversely affect federally listed species or habitat. At issue are the potential effects of the implementation of the Draft Dog Management Plan (project) on the federally threatened California red-legged frog (*Rana drylandi*), western snowy plover (*Charadrius alexandrinus nivosus*), northern spotted owl (*Strix occidentalis caurina*), and Marin dwarf-flax (*Hesperoflinum congestum*); as well as the federally-listed as endangered San Bruno elfin butterfly (*Callophrys mosini bayensis*), mission blue butterfly (*Gaeasteris texensis missionensis*), tidewater goby (*Eucyclogobius newberryi*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), Presidio manzanita (*Arctostaphylos hookeri ravenii*), San Francisco lessingia (*Lessingia germanorum*), Hickman's potentilla (*Potentilla hickmanii*), marsh sandwort (*Arenaria paludicola*), Franciscan manzanita (*Arctostaphylos franciscana*), and Presidio clarkia (*Clarkia franciscana*).

With implementation of the Draft Plan, GGNRA intends to "provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park". On March 22, 2011, the Service issued a memo with the subject *Comments on the Draft Dog Management Plan and Environmental Impact Statement, Golden Gate National Recreation Area, California*. This memo was issued upon review of the subject documents and concluded that the Draft Plan/EIS adequately addressed the Service's concerns for threatened and endangered species and critical habitat in the 21 locations the document covered.

This memo is based on: (1) A letter dated December 28, 2010 from the GGNRA to the Service requesting comments on their Draft Plan/EIS; (2) the January 2011 *Draft Dog Management Plan / Environmental Impact Statement*; (3) A letter dated September 5, 2013 from the GGNRA to the Service requesting comments on the Draft Plans/SEIS; (4) the fall 2013 *Draft Dog Management Plan/ Supplemental Impact Statement*; (5) supplemental information provided by GGNRA staff detailing differences between the Draft Plan/EIS and the Draft Plan/SEIS; and (6) other information available to the Service.

The Draft Plan/SEIS was developed to fully incorporate public comments received on the January 2011 Draft Plan/EIS. Changes reflected in the Draft Plan/SEIS include:

- The addition of the Rancho Corral de Terra property in San Mateo County
- The addition of three federally-listed as endangered plant species (marsh sandwort, Franciscan manzanita, and Presidio clarkia)
- The deletion of California seablite due to its absence from GGNRA property
- The addition of natural and cultural resource monitoring and removal of automatic triggers and restrictions within the monitoring-based management strategy (formerly compliance based management strategy)
- Alteration of the preferred alternative to each site specific preferred alternative included in the Draft plan/SEIS
- Inclusion of new law enforcement and visitor use data
- Revision of the impacts analysis

In contrast to the current "dog policy" within GGNRA, the Draft Plan/SEIS appears to promote a beneficial effect to listed species and critical habitat. The adoption of a monitoring-based management strategy is viewed as an important component of the Draft Plan/SEIS and instills confidence that GGNRA will continue to administer their lands with an emphasis on responsible management of sensitive resources. Additionally, the proposed measures for increasing public awareness through education along with standardized management is viewed as a key factor in the successful implementation of this Draft Plan/EIS. The Service believes that the Draft Plan/SEIS, as proposed, does not significantly change the projects potential effects on federally listed species, meets the goals and objectives of the project, and adequately addresses federally threatened and endangered species and habitat within the project area.

The Service would like to thank GGNRA for the opportunity to comment on this Draft Plan/SEIS. 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 telephone (916) 414-6600 if you have any questions.

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





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.

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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





Enclosure
UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
 NATIONAL MARINE FISHERIES SERVICE
 Southwest Region
 501 West Ocean Boulevard, Suite 4200
 Long Beach, California 90802-4213

March 22, 2011

In response, reply to:
 2010/06355

Frank Dean
 General Superintendent
 National Park Service
 Golden Gate National Recreation Area
 Fort Mason, San Francisco California, 94133

Dear Mr. Dean:

Thank you for your letters dated December 15, 2010, and March 16, 2011, requesting initiation of consultation with NOAA's National Marine Fisheries Service (NMFS) pursuant to section 7 of the Endangered Species Act of 1973 (ESA). This response also serves as consultation under the authority of and in accordance with provisions of the Fish and Wildlife Coordination Act of 1934 (FWCA), as amended. The purpose of your letter is to request our concurrence with your analysis and conclusion that the preferred alternative described in the Draft Dog Management Plan and Environmental Impact Statement (proposed action) is not likely to adversely affect Federally listed endangered coho salmon and threatened steelhead trout or their designated critical habitat.

The purpose of the proposed action is to adopt and implement a dog management plan that would provide a clear, enforceable policy, which would determine the manner and extent of dog use in areas of the Golden Gate National Recreation Area (Park). The proposed action for this consultation includes 21 locations within the Park. Of the 21 locations, only four overlap with the known distribution of Central California Coast (CCC) coho salmon (*Oncorhynchus kisutch*) and CCC steelhead (*O. mykiss*). The four locations include Stinson Beach, Muir Beach, Rodeo Beach, and the Marin Headlands. The remaining 17 locations are outside the known distribution of CCC coho salmon and CCC steelhead, and the effects of dog use in these locations are localized and will not result in adverse effects to listed anadromous salmonids. Therefore, this consultation is limited to the proposed action described in Stinson Beach, Muir Beach, the Marin Headlands, and Rodeo Beach.

The Endangered Species Act

Available information indicates the following ESA listed Pacific salmonid species and critical habitat of the following Distinct Population Segments (DPS) or Evolutionarily Significant Units (ESU) potentially occur in the action area:

Central California Coast (CCC) steelhead DPS (*Oncorhynchus mykiss*)
 Threatened (January 5, 2006; 71 FR 834)
 Critical habitat designated (September 2, 2005; 70 FR 52488)



Central California Coast (CCC) coho salmon ESU (*O. kisutch*)
Endangered (June 28, 2005; 70 FR 37160)
 Critical habitat designated (May 5, 1999; 64 FR 24049)

The proposed action would authorize on-leash dog walking within the designated parking lots and picnic areas at Stinson Beach, but only if the owner has clear, concise direction of the dog. Dog-walkers are required to pick up excrement deposited from their dog(s). Easkoot Creek, which drains to Stinson Beach, is known to support a small population of CCC steelhead. Easkoot Creek is densely vegetated, channelized, and flows parallel and adjacent to the parking lot at Stinson Beach. The proposed action would prohibit dog use in Easkoot Creek. It is unlikely that dog use would occur in Easkoot Creek because: 1) dogs are generally hesitant to enter the dense riparian vegetation, and 2) dogs are precluded from entering Easkoot Creek because they are on-leash and must be clearly under the concise direction of the dog walker. Since the proposed action would prohibit dog use in Easkoot Creek and dog use in Easkoot Creek is unlikely to occur, the proposed action at Stinson Beach is not likely to adversely affect CCC steelhead. CCC coho salmon do not occur in Easkoot Creek; therefore, the proposed action at Stinson beach will not affect CCC coho salmon.

At Muir Beach, the proposed action would allow on-leash dog walking in the parking area and on the Pacific way Trail, provided the dog(s) is physically restrained by the dog walker. The beach and the boardwalk/path to the beach would be closed to dog use. Dog-walkers are required to pick up excrement deposited from their dog(s). Dog use would also be prohibited in the lagoon and Redwood Creek. The proposed action would provide a cable fence positioned along the beach side of the lower Redwood creek and the lagoon to discourage dogs and dog walkers from access the water. Redwood Creek flows into the lagoon which is formed by the sand bar at Muir Beach. Redwood Creek is known to support populations of CCC coho salmon and CCC steelhead. Both species are known to occur within the Park area at Muir Beach. The proposed action would prohibit dog use in the lagoon, Muir Beach, and Redwood Creek (except at existing bridges). It is unlikely that dog use would occur in these areas because: 1) dogs must be on a leash and they are physically restrained at all times by their dog walker; and 2) the cable fence along the beach side of lower Redwood creek and the lagoon will deter dog walkers from allowing their dog(s) entering the water. Since the proposed action would prohibit dog use within the lagoon and Redwood Creek, and because dog use in the lagoon and Redwood Creek is not likely to occur, the proposed action at Muir Beach is not likely to adversely affect CCC steelhead and CCC coho salmon.

At the Marin Headlands Trails, the proposed action would allow on-leash dog walking along trails that are adjacent to Rodeo Creek and Gerbode Creek. Dogs on these trails must remain physically restrained by their walkers at all times. The proposed action would limit dog walking to trails designated by the NPS and would prohibit dogs from using or entering Rodeo Creek and Gerbode Creek. However, dogs and dog walkers are authorized to cross the creeks at existing crossings that have been approved by the NPS. Rodeo Creek and Gerbode Creek are known to support a small population of CCC steelhead. It is unlikely that dog use would occur in Rodeo Creek and Gerbode Creek by dog walkers must prevent their dogs from entering the water by physically restraining with a leash. Since the proposed action would prohibit dog use within the Rodeo Creek and Gerbode Creek, and since dog use in these creeks is not likely to occur, the proposed action in the Marin Headlands Trails is not likely to adversely affect CCC steelhead.

CCC coho salmon do not occur in Rodeo or Gerbode creeks; therefore, the proposed action at the Marin Headlands Trails will not affect CCC coho salmon.

At Rodeo Beach, the proposed action would allow on-leash dog walking on the wooden footbridge over Rodeo Lagoon. Beyond the bridge, dogs would be allowed to roam off leash provided they remain under voice and sight control at all times. Dogs entering Rodeo Lagoon would be prohibited under the proposed action. A post-and-cable fence would be installed to deter dogs from gaining access to Rodeo Lagoon. The fence alone is not effective in being a complete barrier to dogs. Dog-walkers are required to pick up excrement deposited from their dog(s). CCC steelhead are known to occur in Rodeo and Gerbode creeks which flow into Rodeo Lagoon. CCC steelhead will use Rodeo lagoon as a migration corridor, or as rearing habitat during portions of the year when dogs are potentially present. While the proposed action prohibits dogs from entering Rodeo Lagoon, it is likely that some dogs will gain access to the water because dog walkers will not have the ability to physically restrain their dogs. However, data collected in 2007 and 2008 from NPS Law Enforcement staff indicates that only one citation was made but no warnings, or reports were filed due to dogs entering closed areas at Rodeo Beach (e.g., Rodeo Lagoon). Therefore, NMFS anticipates that few dogs will gain access to habitat in Rodeo Lagoon. Should dogs could gain access to Rodeo Lagoon, NMFS expects the disturbance caused by their presence to be isolated and temporary, because dog walkers will respond quickly and take corrective action to get their dog(s) out of the closed area (i.e., Rodeo Lagoon). The potential effects of a few dogs gaining access to Rodeo Lagoon include brief and negligible increases in turbidity and the potential for depositing excrement in the Lagoon. However, based on data from NPS Law Enforcement from 2007 and 2008, NMFS does not expect dogs to enter and remain in the lagoon, at a duration, frequency, or abundance, for any potential effects to degrade long-term habitat function. These effects are considered minimal and discountable and are not expected to result in either immediate or long-term diminishment of habitat values or result in adverse impacts to designated critical habitat for anadromous salmonids. The proposed action at Rodeo Beach is not likely to adversely affect CCC steelhead. CCC coho salmon do not occur in Rodeo or Gerbode creeks; therefore, the proposed action at Rodeo Beach will not affect CCC coho salmon.

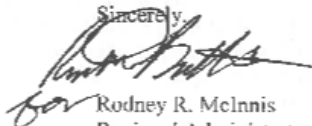
Based on the best available scientific information, NMFS concurs with the NPS' determination that the proposed action is not likely to adversely affect the endangered and threatened species listed above. Regarding designated critical habitat, NMFS has determined the proposed action is not likely to adversely affect essential physical or biological features associated with salmonid critical habitat. This concludes consultation in accordance with 50 CFR 402.13(a) for the proposed action. However, further consultation may be required if: 1) new information becomes available indicating that listed species or habitat may be affected by the project in a manner or to an extent not previously considered; 2) current project plans change in a manner that causes an effect to listed species or critical habitat in a manner not previously considered; or 3) a new species is listed or critical habitat designated that may be affected by the action.

Fish and Wildlife Coordination Act

The purpose of the FWCA is to ensure that wildlife conservation receives equal consideration, and is coordinated with other aspects of water resources development [16 U.S.C. 661]. The FWCA establishes a consultation requirement for Federal departments and agencies that undertake any action that proposes to modify any stream or other body of water for any purpose,

including navigation and drainage [16 U.S.C. 662(a)]. Consistent with this consultation requirement, NMFS provides recommendations and comments to Federal action agencies for the purpose of conserving fish and wildlife resources. The FWCA allows the opportunity to offer recommendations for the conservation of species and habitats beyond those currently managed under the ESA. NMFS has no FWCA recommendations to offer regarding this project because the project contains adequate measures to protect aquatic habitat.

Please contact Mr. Dan Wilson at (707)-578-8555, or via email at dan.wilson@noaa.gov should you have any questions concerning this consultation.

Sincerely,

Rodney R. McInnis
Regional Administrator

cc: Scott Wilson, CDFG, Yountville



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94133

IN REPLY REFER TO:

L76 (GOGA-PLAN)

SEP - 5 2013

Rodney McInnis, Regional Administrator
National Oceanic and Atmospheric Administration
National Marine Fisheries Service, Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802

Subject: Section 7 Consultation for the Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan / Supplemental Environmental Impact Statement

Dear Mr. McInnis:

Attached please find applicable excerpts of the draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS). The NPS is seeking concurrence from your agency that the Plan to be implemented is not likely to adversely affect species or habitat protected under the Endangered Species Act, as amended.

In January 2011, the NPS sent a letter to your agency along with applicable excerpts of the draft Golden Gate National Recreation Area (GGNRA) Dog Management Plan /Environmental Impact Statement (draft plan/EIS). The purpose of this letter is to inform you that a supplemental EIS (SEIS) has been prepared for this project to fully incorporate public comment received on the draft plan/EIS. Release of the SEIS gives the National Park Service (NPS) the opportunity to receive comment from the public on this new information before the NPS issues a Notice of Proposed Rulemaking, the final plan/EIS and record of decision, and final rule.

To address substantive public comments on the draft plan/EIS, the NPS incorporated a number of changes to the draft plan/SEIS, which include the following:

- The addition of new data (including additional law enforcement and visitor use data)
- The incorporation of new references
- Additional *Americans with Disabilities Act* (ADA) information
- Changes to the impacts analysis (including additional analysis of potential redistributive effects of opening/closing areas to dog walking)
- Changes to the compliance-based management strategy (now referred to as the monitoring-based management strategy) by including natural and cultural resource monitoring and removing automatic triggers and restrictions
- Evaluation of additional fencing as a method to minimize dog walking impacts,
- Relatively minor changes to each site specific preferred alternative

- A site recently transferred to GGNRA, Rancho Corral de Tierra (Rancho), was added to the park sites specifically addressed by the plan and a range of reasonable alternatives for the site was developed and is analyzed in this draft plan/SEIS.

The draft plan/SEIS describes six alternatives at 22 sites, including the preferred alternative (alternative F), for the management of dog walking activities at GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. Alternative F is the preferred alternative, and was altered in part in response to public comments received on the draft plan/EIS. Alternative F provides a variety of visitor use (no dogs, on-leash dog walking, and dog walking under voice and sight control in ROLAs) as well as protection of natural resources, cultural resources, and visitor safety.

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; visitor experience; consultation with tribes and federal and state agencies; and the Federal Panel Recommendations on Dog Walking to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. However, the plan/SEIS 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 22 sites under consideration for this plan/SEIS and the project area are shown in the attached Figure 1.

This draft plan/SEIS 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. These conflicts will likely continue to escalate if not addressed in a comprehensive plan/EIS.

In our preparation of the draft plan/SEIS, we have analyzed the potential impacts of six alternatives including a No Action and a Preferred Alternative on listed aquatic and marine species occurring or potentially present within the 22 sites of GGNRA selected for dog management. Because the draft plan/SEIS is a very large document we have attached excerpted applicable sections of the document 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.

The monitoring-based management strategy (MMS) (formerly the Compliance-Based Management Strategy) has been designed to encourage compliance with sections of the Code of Federal Regulations (CFR) applicable to dog management, and ensure protection of park resources, visitors and staff. The MMS will provide the framework for monitoring and recording observed noncompliance with the applicable sections of the CFR, including the new 36 CFR Part 7 special regulation for dog management, and will guide use of park resources to address those violations. Noncompliance with federal regulations related to dog management will be met with a range of management responses. The MMS will also monitor for impacts to natural and cultural resources. The monitoring-based management strategy has been changed from the draft plan/EIS to remove a strict threshold for compliance that would trigger a change to more restrictive management. Monitoring of natural and cultural resources, not just compliance with existing regulations, is a new requirement. This change will allow the NPS to weigh violations

within the context of an area. For example, disturbance of threatened and endangered (T&E) species and habitat would be a high priority for management to address. This information will guide the park in the future if additional restrictions become necessary. Law enforcement will continue to issue citations for individual violations. Additionally, monitoring data will provide law enforcement with information on where to prioritize these efforts.

Habitat used by federally threatened or endangered species may be vulnerable to impacts from intensive use of public areas by humans and dogs, specifically two species under your jurisdiction, the Central California Coast (CCC) steelhead (*Oncorhynchus mykiss*) distinct population segment (DPS) and the Central California Coast (CCC) coho salmon (*O. kisutch*) evolutionarily significant unit (ESU). The CCC coho salmon ESU occurs at one location in GGNRA within the study area, Muir Beach (Redwood Creek). The CCC steelhead DPS occurs at five locations at GGNRA within the study area, including Stinson Beach (Easkoot Creek), Muir Beach (Redwood Creek), Rodeo Beach (Rodeo Lagoon), the Marin Headlands (Rodeo Creek and Gerbode Creek), and the newly added and analyzed Rancho Corral de Tierra site (Denniston Creek and Martini Creek). Although the preferred alternative has changed at some of the GGNRA sites, these changes have not altered the types of impacts that were originally stated for the GGNRA sites where these two fish species occur. The addition of the analysis for the CCC steelhead DPS at the Rancho Corral de Tierra site is new text for your review. We have concluded that the preferred alternative for the five selected sites of GGNRA where steelhead trout and coho salmon occur is "not likely to adversely affect" these species. Therefore, we do not believe that formal consultation is required. Please respond in writing within 60 days from the date of receipt, or no later than the end of the public comment period on the draft plan/SEIS, if you do or do not concur with our assessment.

Previously in a letter to the NPS dated 22 March 2011, NMFS had no Fish and Wildlife Coordination Act (FWCA) recommendations to offer regarding this project because the project contains adequate measures to protect aquatic habitat. The draft plan/SEIS continues to incorporate the same measures to protect aquatic habitat as the draft plan/EIS dated January 2011, including not allowing dogs in any fresh water bodies at GGNRA. Please confirm that NMFS has no further FWCA recommendations to offer regarding this project.

If, based on comments received during public review of the plan/SEIS, the NPS determines that the preferred alternative should be altered or amended, the 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, Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov.

Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

Enclosures:

Table 1 – Federally and State-listed Species Considered in the Draft Plan/SEIS
Figure 1 – Vicinity Map



TABLE 1. FEDERALLY AND STATE-LISTED SPECIES CONSIDERED IN THE DRAFT PLAN/SEIS

Group	Scientific Name	Common Name	Federal Status ^a	State Status ^a	GGNRA Location of Mapped Occurrence or Potential Habitat
Invertebrate	<i>Callophrys mossii bayensis</i>	San Bruno elfin butterfly	FE	—	Milagra Ridge
Invertebrate	<i>Icaricia icarioides ssp. missionensis</i>	Mission blue butterfly	FE	—	Alta Trail / Orchard Fire Road / Pacheco Fire Road, Oakwood Valley, Marin Headlands Trails (Tennessee Valley), Fort Baker, Milagra Ridge, and Sweeney Ridge / Cattle Hill,
Fish	<i>Eucyclogobius newberryi</i>	Tidewater goby	FE, CH	—	Rodeo Beach (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	—	Stinson Beach (Eskoot Creek), Muir Beach (Redwood Creek), Rodeo Beach (Rodeo Lagoon), and Marin Headlands Trails (Rodeo Creek and Garbode Creek)
Amphibian	<i>Rana draytonii</i>	California red-legged frog	FT, CH	—	Muir Beach, Marin Headlands Trails (Rodeo Lake, Rodeo Lagoon, and Tennessee Valley), Mori Point, Milagra Ridge, Sweeney Ridge / Cattle Hill, Rancho Corral de Tierra
Reptile	<i>Thamnophis sirtalis tetrataenia</i>	San Francisco garter snake	FE	SE	Mori Point, Milagra Ridge, Sweeney Ridge, Rancho Corral de Tierra
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, and Marin Headlands Trails
Mammal	<i>Arctocephalus townsendi</i>	Guadalupe fur seal	FT	ST	Potential stranding on all beach areas
Mammal	<i>Eumetopias jubatus</i>	Steller sea lion	FT, CH ^b	—	Potential stranding on all beach areas
Plant	<i>Arctostaphylos franciscana</i>	Franciscan manzanita	FE	—	Baker Beach and Fort Point
Plant	<i>Arctostaphylos hookeri ssp. ravenii</i>	Presidio (Raven's) Manzanita	FE	SE	Baker Beach
Plant	<i>Arenaria paludicola</i>	Marsh sandwort	FE	SE	Marin Headlands
Plant	<i>Clarkia franciscana</i>	Presidio Clarkia	FE	—	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>Potentilla hickmanii</i>	Hickman's potentilla (Hickman's cinquefoil)	FE	SE	Mori Point, Pedro Point, Rancho Corral de Tierra

^a FE = 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 the critical habitat does not occur in GGNRA.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

West Coast Region
777 Sonoma Avenue, Room 325
Santa Rosa, California 95404-4731

RECEIVED

November 20, 2013

In response reply to:
2010-06355

NOV 22 2013

SUPERINTENDENT'S OFFICE

Frank Dean, General Superintendent
National Park Service
Golden Gate National Recreation Area
Fort Mason, San Francisco California, 94123

Dear Mr. Dean:

Thank you for your letter dated September 16, 2013, requesting initiation of consultation with NOAA's National Marine Fisheries Service (NMFS) pursuant to section 7 of the Endangered Species Act of 1973 (ESA). This response also serves as consultation under the authority of and in accordance with provisions of the Fish and Wildlife Coordination Act of 1934 (FWCA), as amended. The purpose of your letter is to request our concurrence with your analysis and conclusion that the preferred alternative described in the Draft Dog Management Plan for the Golden Gate National Recreation Area (GGNRA) (proposed action), as described within the Preferred Alternative of NPS' Supplemental Environmental Impact Statement (EIS), is not likely to adversely affect Federally listed endangered coho salmon and threatened steelhead trout, or their designated critical habitat.

NMFS previously consulted informally on NPS' draft Dog Management Plan, concurring with NPS' determination via letter dated March 22, 2011 (Enclosure), that the dog management plan, as proposed in the draft EIS' preferred alternative, was not likely to adversely affect steelhead, salmon or their designated critical habitat. Following that consultation, public comments received regarding the draft EIS necessitated changes to the draft dog management plan and the creation of a supplemental EIS. It is the preferred alternative of the supplemental EIS that forms the proposed action for this consultation.

The purpose of the proposed action as described in the supplemental EIS is to adopt and implement a dog management plan that would provide a clear, enforceable policy that would determine the manner and extent of dog use in areas of the GGNRA. Concerning actions that may affect listed species or critical habitat, no changes have occurred with regard to proposed dog management at four GGNRA locations that overlap with the known distribution of Central California Coast (CCC) coho salmon (*Oncorhynchus kisutch*) and CCC steelhead (*O. mykiss*) (i.e., Stinson Beach, Muir Beach, Rodeo Beach, and the Marin Headlands). In the March 22, 2011 letter, NMFS concurred with NPS's determination that dog management at those four locations was not likely to adversely affect listed salmonids or their designated critical habitat (see Enclosure.) The only change in the supplemental EIS that may impact listed salmonids or



their critical habitat is NPS' inclusion of proposed dog management at Rancho Corral de Tierra Park (San Mateo County), which is bisected by two creeks that historically supported steelhead populations (Denniston and Martini creeks). To avoid redundancy, analysis in this letter is limited to the new portion of the proposed action pertaining to Rancho Corral de Tierra Park; the "not likely to adversely affect" conclusions regarding the rest of the draft GGNRA Dog Management Plan remain as analyzed in NMFS' March 22, 2011, letter (see Attachment).

The action area for the analysis below is the sections of Denniston and Martini creeks and their associated riparian corridors that traverse through Rancho Corral de Tierra Park.

The Endangered Species Act

Available information indicates the following ESA-listed steelhead Distinct Population Segments (DPS) occur in the action area:

Central California Coast (CCC) steelhead DPS (*Oncorhynchus mykiss*) Threatened (January 5, 2006; 71 FR 834)

Designated critical habitat occurs only within the lower 1.5 miles of Denniston Creek, downstream of the Rancho Corral de Tierra Park boundary (September 2, 2005; 70 FR 52488). Martini Creek contains no designated critical habitat for CCC steelhead.

The proposed action would authorize on-leash dog walking on Old San Pedro Mountain Road, which crosses Martini Creek by bridge, and on the Denniston Ridge Trail, which encroaches within 850 feet of Denniston Creek at one location. However, a substantial distance of dense riparian and upland vegetation separates both paths and the creeks in question, and dog or human access into Martini or Denniston creeks from the paths is unlikely due to the difficulty in passing through the vegetation. Thus, proposed dog walking management within Rancho Corral de Tierra Park is not likely to adversely affect CCC steelhead.

Based on the best available scientific information, NMFS concurs with the NPS' determination that the proposed GGNRA Dog Management Plan, including the added Rancho Corral de Tierra Park management, is not likely to adversely affect CCC steelhead. This concludes consultation in accordance with 50 CFR 402.13(a) for the proposed action. However, further consultation may be required if: 1) new information becomes available indicating that listed species or habitat may be affected by the project in a manner or to an extent not previously considered; 2) current project plans change in a manner that causes an effect to listed species or critical habitat in a manner not previously considered; or 3) a new species is listed or critical habitat designated that may be affected by the action.

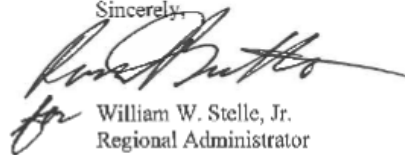
Fish and Wildlife Coordination Act

The purpose of the FWCA is to ensure that wildlife conservation receives equal consideration, and is coordinated with other aspects of water resources development [16 U.S.C. 661]. The FWCA establishes a consultation requirement for Federal departments and agencies that

undertake any action that proposes to modify any stream or other body of water for any purpose, including navigation and drainage [16 U.S.C. 662(a)]. Consistent with this consultation requirement, NMFS provides recommendations and comments to Federal action agencies for the purpose of conserving fish and wildlife resources. The FWCA allows the opportunity to offer recommendations for the conservation of species and habitats beyond those currently managed under the ESA. As requested within your letter of September 16, 2013, NMFS confirms that it has no FWCA recommendations to offer because the project contains adequate measures to protect aquatic habitat.

Please contact Mr. Rick Rogers at (707)-578-8552, or via email at rick.rogers@noaa.gov, should you have any questions concerning this consultation.

Sincerely,

A handwritten signature in black ink, appearing to read "William W. Stelle, Jr.", with a stylized flourish at the end.

William W. Stelle, Jr.
Regional Administrator



United States Department of the Interior

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

IN REPLY REFER TO:

1.76 (GOGA-NRMR)

JAN 29 2014

Will Stelle, Regional Administrator
National Oceanic and Atmospheric Administration
c/o Dick Butler, North Coast Supervisor
777 Sonoma Ave., Rm. 325
Santa Rosa, California 95402

Re: Clarification on Section 7 Consultation for the Golden Gate National Recreation Area (GGNRA)
Draft Dog Management Plan / Supplemental Environmental Impact Statement

Dear Mr. Stelle:

On September 6, 2013, we sent you applicable excerpts of the draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS) with a request for your concurrence that the draft plan/SEIS to be implemented is not likely to adversely affect species or habitat protected under the Endangered Species Act, as amended. We received your timely response on November 22, 2013, in which you found that the plan is not likely to adversely affect OCC steelhead.

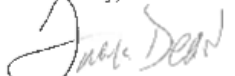
In our September 6, 2013 consultation letter to you, we had noted that there were relatively minor changes to the alternatives for some sites in the preferred alternative, and concluded that the preferred alternative for the five selected sites of GGNRA where steelhead trout and coho salmon occur is "not likely to adversely affect" these species. However, our letter did not explicitly note that one of those relatively minor changes was the preferred alternative for Muir Beach, which was modified from prohibiting dogs to allowing on-leash dog walking along the connecting bridge, on the beach and on the proposed Muir Beach Trail (Figure 2b. Note that Figure 2b includes both the original DEIS map and the SEIS map). Fencing would be installed along the dunes and the lagoon to protect the natural resources in these areas; however, the fencing would act only as a visible barrier and would not completely exclude dogs from the area, as exclusion fencing would be inappropriate at Muir Beach and not sustainable due to the extremely dynamic beach environment. Allowing on-leash dog walking on the beach and installing visual barriers would enable the park to manage the area in order to restore, protect, and sustain the wetlands, creeks, dunes, and lagoon. The preferred alternative would also provide protection for the shorebirds, California red-legged frog, steelhead trout, coho salmon, and other wildlife in the area. Allowing on-leash dog walking on the beach would also protect the visitor experience and enhance visitor safety, as dogs would be under control on a 6-foot leash. A regulated off-leash area (ROLA) would not be established at Muir Beach.

Because of this change at Muir Beach in the SEIS, we are requesting your additional review and concurrence that the preferred alternative in the SEIS would not be likely to adversely affect CCC steelhead and coho salmon or their designated critical habitat. To assist in your analysis, we have also included a summary of the preferred alternative and effects to both steelhead and coho and respective designated critical habitat.

If, based on comments received during public review of the plan/SEIS, the NPS determines that the preferred alternative should be altered or amended, the 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, you may contact Michael B. Edwards at 303-969-2694, or michael_b_edwards@nps.gov. We would appreciate your response in writing within 60 days from the date of receipt, if you do or do not concur with our assessment.

Sincerely,



Frank Dean
General Superintendent

Enclosures:

Table 1 – Federally and State-listed Species Considered in the Draft Plan/SEIS
Table 2-- Summary of Preferred Alternative and Effects to Coho and Steelhead
Figure 1 – Project and Muir Beach Vicinity Map

TABLE 1. FEDERALLY AND STATE-LISTED SPECIES CONSIDERED IN THE DRAFT PLAN/SEIS

Group	Scientific Name	Common Name	Federal Status ^a	State Status ^a	GGNRA Location of Mapped Occurrence or Potential Habitat
Invertebrate	<i>Callophrys mossii bayensis</i>	San Bruno elfin butterfly	FE	—	Milagra Ridge
Invertebrate	<i>Icaricia icarioides ssp. missionensis</i>	Mission blue butterfly	FE	—	Alta Trail / Orchard Fire Road / Pacheco Fire Road, Oakwood Valley, Marin Headlands Trails (Tennessee Valley), Fort Baker, Milagra Ridge, and Sweeney Ridge / Cattle Hill,
Fish	<i>Eucyclogobius newberryi</i>	Tidewater goby	FE, CH	—	Rodeo Beach (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	—	Stinson Beach (Easkoot Creek), Muir Beach (Redwood Creek), Rodeo Beach (Rodeo Lagoon), and Marin Headlands Trails (Rodeo Creek and Gerbode Creek), Rancho Corral de Tierra (Danniston and Martini Creeks)
Amphibian	<i>Rana draytonii</i>	California red-legged frog	FT, CH	—	Muir Beach, Marin Headlands Trails (Rodeo Lake, Rodeo Lagoon, and Tennessee Valley), Mori Point, Milagra Ridge, Sweeney Ridge / Cattle Hill, Rancho Corral de Tierra
Reptile	<i>Thamnophis sirtalis tetrataenia</i>	San Francisco garter snake	FE	SE	Mori Point, Milagra Ridge, Sweeney Ridge, Rancho Corral de Tierra
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, and Marin Headlands Trails
Mammal	<i>Arctocapellus townsendi</i>	Guadalupe fur seal	FT	ST	Potential stranding on all beach areas
Mammal	<i>Eumetopias jubatus</i>	Steller sea lion	FT, CH ^b	—	Potential stranding on all beach areas
Plant	<i>Arctostaphylos franciscana</i>	Franciscan manzanita	FE	—	Baker Beach and Fort Point
Plant	<i>Arctostaphylos hookeri ssp. ravenii</i>	Prosidio (Raven's) Manzanita	FE	SE	Baker Beach
Plant	<i>Arenaria paludicola</i>	Marsh sandwort	FE	SE	Marin Headlands
Plant	<i>Clarkia franciscana</i>	Presidio Clarkia	FE	—	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>Potentilla hickmanii</i>	Hickman's potentilla (Hickman's cinquefoil)	FE	SE	Mori Point, Pedro Point, Rancho Corral de Tierra

^a FE = 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 the critical habitat does not occur in GGNRA.

Table 2. Summary of potential impacts to listed salmonids and/or critical habitat resulting from the Preferred Alternative.

Common Name	GGNRA Location of Mapped Occurrence or Potential Habitat	Description of Preferred Alternative	GGNRA effects determination
Coho salmon—central California coast	Muir Beach (Redwood Creek)	Would allow the presence of on-leash dog walking as illustrated in Map 5-F (SEIS)	Lagoon and Redwood Creek are closed to dogs. If dogs are physically restrained on leash and deterred by fencing, should not gain access to creek or its shorelines. NLAA. (9/5/2013 NPS letter)
Steelhead—central California coast	Stinson Beach (Easkoot Creek)	Would allow the presence of on-leash dog walking as illustrated in Map 2-F (SEIS). No change from DEIS	No dogs will be allowed to enter the creek. Furthermore, dense riparian vegetation between the creek and developed areas where dogs would be permitted would preclude non-compliant dog access. NLAA. (12/15/2010, 3/14/2011 NPS letters)
	Muir Beach (Redwood Creek),	Would allow the presence of on-leash dog walking as illustrated in Map 5-F (SEIS)	Lagoon and Redwood Creek are closed to dogs. If dogs are physically restrained on leash and deterred by fencing, should not gain access to creek or its shorelines. NLAA (9/5/2013 NPS letter)
	Rodeo Beach (Rodeo Lagoon)	Would allow the presence of regulated off-leash dog area on Rodeo Beach as illustrated in Map 6-F (SEIS). No change from DEIS	Steelhead trout is only found in Rodeo Lagoon for very limited periods; during migration due to existing poor water quality. NLAA (12/15/2010, 3/14/2011 NPS letters)
	Marin Headlands Trails (Rodeo Creek and Gerbode Creek)	Would allow the presence of on-leash dog walking as illustrated in Map 7-F (SEIS). No change from DEIS	No dogs will be allowed to enter the creek. Furthermore, dense riparian vegetation between the creek and trails where dogs would be permitted would preclude non-compliant dog access. NLAA (12/15/2010, 3/14/2011 NPS letters)
	Rancho Corral de Tierra (Dennistown and Martini Creeks)	Would allow the presence of on-leash dog walking as illustrated in Map 21-F (SEIS)	No dogs will be allowed to enter the creek. Furthermore, dense riparian vegetation between the creek and trails where dogs would be permitted would preclude non-compliant dog access. NLAA (9/5/2013 NPS letter)



Figure 1a: Project Vicinity Map



Figure 2a: Preferred Alternative for Stinson Beach from SEIS.



Figure 7b: Preferred Alternative for Muir Beach from DEIS (2011, upper left inset) and SEIS (lower right inset)



Figure 2c: Preferred Alternative for Rodeo Beach from SEIS.



Figure 2d: Preferred Alternative for Marin Headlands from SEIS.



Figure 2e: Preferred Alternative for Rancho Corral de Tierra from SEIS.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
777 Sonoma Avenue, Room 325
Santa Rosa, California 95404-4731

May 5, 2014

Refer to NMFS No: WCR-2014-524

RECEIVED

MAY - 9 2014

SUPERINTENDENT'S OFFICE

Frank Dean
General Superintendent
National Park Service - Fort Mason
Golden Gate National Recreation Area
San Francisco, California 94123

Re: Endangered Species Act Section 7(a)(2) Concurrence Letter for the Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan / Supplemental Environmental Impact Statement

Dear Mr. Dean:

On January 29, 2014, NOAA's National Marine Fisheries Service (NMFS) received your request for a written concurrence that the Golden Gate National Recreation Area's (GGNRA) implementing of its Draft Dog Management Plan, described as the preferred alternative in GGNRA's Dog Management Plan Supplemental Environmental Impact Statement (SEIS), is not likely to adversely affect (NLAA) species listed as threatened or endangered or critical habitats designated under the Endangered Species Act (ESA). This response to your request was prepared by NMFS pursuant to section 7(a)(2) of the ESA, implementing regulations at 50 CFR 402, and agency guidance for preparation of letters of concurrence.

NMFS also reviewed the proposed action for potential effects on essential fish habitat (EFH) designated under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), including conservation measures. This review was pursuant to section 305(b) of the MSA, implementing regulations at 50 CFR 600.920, and agency guidance for use of the ESA consultation process to complete EFH consultation. In this case, NMFS concluded the action would not adversely affect EFH. Thus, consultation under the MSA is not required for this action.

This letter underwent pre-dissemination review using standards for utility, integrity, and objectivity in compliance with applicable guidelines issued under the Data Quality Act (section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, Public Law 106-554). The concurrence letter will be available through NMFS' Public Consultation Tracking System (<https://pcts.nmfs.noaa.gov/pcts-web/homepage.pcts>).¹ A complete record of this consultation is on file at NMFS' North Central California Office in Santa Rosa, California.

¹ Once on the PCTS homepage, use the following PCTS tracking number within the Quick Search column: WCR-2014-524, or search for the project by name: GGNRA Dog Management Plan.



Proposed Action, Action Agency Effect Determination, and Action Area

NMFS has reviewed the information provided with GGNRA's letter of January 29, 2014, including the associated documents, and the SEIS. The purpose of the proposed action is to adopt and implement a dog management plan that would provide a clear, enforceable policy, determining the manner and extent of dog use in areas of the GGNRA. The proposed action for this consultation includes 22 locations within the Park. Of the 22 locations, only five overlap with the known distribution of Central California Coast (CCC) coho salmon (*Oncorhynchus kisutch*) and CCC steelhead (*O. mykiss*). The five locations include Muir Beach (Redwood Creek), Stinson Beach (Easkoot Creek), Rodeo Beach (Rodeo Lagoon), Marin Headlands (Rodeo and Gerbode creeks), and Rancho Corral de Tierra (Denniston and Martini creeks). The remaining 17 locations are outside the known distribution of CCC coho salmon and CCC steelhead, and the effects of dog use in these locations are localized and will not result in adverse effects to listed anadromous salmonids. Therefore, this consultation is limited to the proposed actions at Stinson Beach, Muir Beach, the Marin Headlands, and Rodeo Beach, and Rancho Corral de Tierra, which are detailed further below.

- **Muir Beach (Redwood Creek)** – Proposed action would allow the presence of on-leash dog walking on the area of beach between the ocean and the lagoon, and on the trail adjacent the lower one-fourth mile of Redwood Creek. GGNRA has determined this portion of the action is NLAA because the potential for dogs to access creek or lagoon habitat is discountable. Dogs will not, by law, be allowed within Redwood Creek or its lagoon. Even within the dog walking areas, dogs will be required to be physically restrained on leash at all times. Dog walking areas and the creek/lagoon habitat will be separated by fencing.
- **Stinson Beach (Easkoot Creek)** - The proposed action would authorize on-leash dog walking within the designated parking lots and picnic areas at Stinson Beach. Easkoot Creek, which drains to Stinson Beach, is known to support a small population of CCC steelhead. Easkoot Creek is densely vegetated, channelized, and flows parallel and adjacent to the parking lot at Stinson Beach. GGNRA considers the proposed action is not likely to adversely affect listed fish or habitat in Easkoot Creek because leashed dogs are unlikely to enter the creek or riparian habitat.
- **Marin Headlands (Rodeo and Gerbode creeks)** - The proposed action would allow on-leash dog walking along trails that are adjacent to or cross over Rodeo Creek and Gerbode Creek. Dogs on these trails must remain physically restrained by their walkers at all times. The proposed action would limit dog walking to trails designated by the GGNRA and would prohibit dogs from using or entering Rodeo Creek and Gerbode Creek. However, dogs and dog walkers are authorized to cross the creeks at existing bridge crossings that have been approved by the GGNRA. GGNRA has determined that the proposed action in the Marin Headlands Trails is not likely to adversely affect listed salmon or steelhead, or their habitat, because dog walkers will prevent their dogs from entering the water by physically restraining them with a leash. Thus, dog access into Rodeo Creek and Gerbode Creek, or riparian habitat adjacent to the creeks, is unlikely to occur.

- Rodeo Beach (Rodeo Lagoon) - The proposed action would allow on-leash dog walking on the wooden footbridge over Rodeo Lagoon. Beyond the bridge, dogs would be allowed to roam off leash on Rodeo Beach, provided they remain under voice and sight control at all times. Dogs would be prohibited from entering Rodeo Lagoon under the proposed action. Therefore, dogs are not expected to encounter steelhead residing in the lagoon, and are not expected to degrade lagoon habitat when approaching the water's edge – estuarine shoreline habitat along the ocean-side of the lagoon is a sand barrier beach with no vegetation or complex cover elements. GGNRA has determined that the proposed action at Rodeo Beach is not likely to adversely affect listed steelhead.
- Rancho Corral de Tierra (Denniston and Martini creeks) – The proposed action would allow the presence of on-leash dog walking on a few trails in the lower Denniston Creek watershed, all of which are located a sizeable distance from Denniston and Martini creeks (a tributary of Denniston Creek). Dog access into the creeks is prohibited under the proposed action. Furthermore, dense riparian vegetation between the trail and creek channels would likely preclude non-compliant dog access. For these reasons, GGNRA has determined the proposed action is not likely to adversely affect listed fish or habitat at the Rancho Corral de Tierra portion of the GGNRA.

The action area for the Project encompasses the following stream sections and lagoons:

- Easkoot Creek (Stinson Beach): stream and associated riparian corridor between approximately 37.897727°, -122.639870° and 37.898806°, -122.642603°.
- Redwood Creek (Muir Beach) and Lagoon: lagoon, stream and associated riparian corridor from approximately 37.860447°, -122.574534° downstream to the Pacific Ocean.
- Marin Headlands: the section of Rodeo Lagoon directly adjacent to the sand spit separating the lagoon from the Pacific Ocean, and Rodeo Creek and associated riparian corridor from the lagoon upstream to 37.837911°, -122.503593°. Also, Gerbode Creek and associated riparian corridor from its confluence with Rodeo Creek upstream to 37.840176°, -122.516249°.
- Rancho Corral de Tierra (Denniston and Martini creeks): the section of Denniston Creek and associated riparian corridor 37.516°, -122.486°; and a trail crossing over Martini Creek at 37.554°, -122.508°.

Available information indicates the following listed species under the jurisdiction of NMFS may be affected by the proposed project:

Central California Coast (CCC) coho salmon Evolutionarily Significant Unit (ESU)
Endangered (70 FR 37160; June 28, 2005)
Critical habitat designated (64 FR 24049; May 5, 1999);

CCC steelhead Distinct Population Segment (DPS)
Threatened (71 FR 834; January 5, 2006)
Critical habitat (70 FR 52488; September 2, 2005).

The life history of steelhead is summarized in Busby *et al.* (1996) and coho salmon life history is summarized in Weitkamp *et al.* (1996). Within the action area, primary constituent elements of

designated critical habitat for steelhead and essential habitat features for coho salmon include water quality and quantity, foraging habitat, natural cover including large substrate and aquatic vegetation, migratory corridors free of obstructions, and freshwater spawning sites.

The GGNRA has determined that the proposed action is unlikely to adversely affect each of these species and their critical habitats because: 1) dogs will not be allowed within any streams or lagoons identified within the Plan and 2) on most trails, leashed dogs have little chance of leaving the trail, traversing a thick riparian corridor, and entering stream habitat.

Effects of the Action

Under the ESA, “effects of the action” means the direct and indirect effects of an action on the listed species or critical habitat, together with the effects of other activities that are interrelated or interdependent with that action (50 CFR 402.02). The applicable standard to find that a proposed action is not likely to adversely affect listed species or critical habitat is that all of the effects of the action are expected to be discountable, insignificant, or completely beneficial. Beneficial effects are contemporaneous positive effects without any adverse effects to the species or critical habitat. Insignificant effects relate to the size of the impact and should never reach the scale where take occurs. Discountable effects are those extremely unlikely to occur.

At almost all dog walking sites that overlap with anadromous salmonid habitat in GGNRA, dogs will be leashed, and thus unable to access riparian or instream habitat. The one exception is Rodeo Beach at Rodeo Lagoon, where off-leash walking is permitted (however, like the rest of the park, dogs are not allowed within the creek or lagoon). At Rodeo Lagoon, a post-and-cable fence will be installed to deter dogs from gaining access to Rodeo Lagoon. The fence alone will not be effective in being a complete barrier to dogs. While the proposed action prohibits dogs from entering Rodeo Lagoon, it is possible that dogs will infrequently gain access to the water due to dog-walking scofflaws that intentionally choose not to physically restrain their dogs. However, impacts to individual steelhead and steelhead habitat arising from these occasional dog incursions will be either insignificant or wholly discountable. Rodeo lagoon is a relatively small lagoon with little juvenile rearing habitat, especially on the west side where no shoreline vegetation is present. Furthermore, water depth along the west shoreline (the area where dogs may enter) is very shallow, and the shallow depth combined with an inherent lack of cover likely precludes inhabitation by juvenile steelhead throughout the year. Furthermore, past NPS lagoon sampling records suggest few, if any, steelhead juveniles ever reside in the lagoon; annual NPS beach seining efforts targeting endangered tidewater gobies (*Eucyclogobius newberryi*) have not once incidentally captured a steelhead during approximately two decades of sampling (Fong 2014). In light of these results, NPS biologists consider Rodeo Lagoon largely migratory habitat for steelhead adults and smolts, and suspect that most migrating fish travel swiftly through the lagoon utilizing the deeper habitat adjacent the eastern shore (Fong 2014). Thus, infrequent intrusion by dogs into the already poor lagoon habitat adjacent the west shore is likely an insignificant impact, given the general lack of functional habitat that currently exists at the site. Moreover, impacts to individual fish are likely discountable, since NPS data suggests steelhead do not inhabit the shallow, exposed section of lagoon adjacent the west shoreline where dog use could occur. Dog feces are not expected to appreciably degrade lagoon water quality, since dogs largely defecate on dry land, and NPS regulations require dog owners to pick up after their pets.

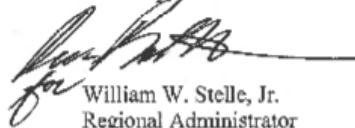
Conclusion

Based on this analysis, NMFS concurs with the GGNRA that the proposed action is not likely to adversely affect the subject listed species and designated critical habitats.

Reinitiation of consultation is required and shall be requested by the GGNRA or by NMFS, where discretionary Federal involvement or control over the action has been retained or is authorized by law and (1) new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered; (2) the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this concurrence letter; or if (3) a new species is listed or critical habitat designated that may be affected by the identified action (50 CFR 402.16). This concludes the ESA portion of this consultation.

Please direct questions regarding this letter to Mr. Rick Rogers of our North Central California Office at (707) 578-8552.

Sincerely,



William W. Stelle, Jr.
Regional Administrator

cc. ARN# 151422SWR2014SR00060

Literature Cited

- Busby, P.J., T.C. Wainwright, G.J. Bryant, L. Lierheimer, R.S. Waples, F.W. Waknitz, and I.V. Lagomarsino. 1996. Status review of west coast steelhead from Washington, Idaho, Oregon, and California. NOAA Technical Memorandum NMFS-NWFSC-27. NOAA, National Marine Fisheries Service, Northwest Fisheries Science Center, Seattle, Washington. August, 1996.
- Fong, D. 2014. Personal communication with Darren Fong, NPS Biologist. March 31, 2014.
- Weitkamp, L.A., T.C. Wainwright, G.J. Bryant, G.B. Milner, D.J. Teel, R.G. Kope, and R.S. Waples. Status review of coho salmon from Washington, Oregon, and California. U.S. Dep. Commerce, NOAA tech. Memo. NMFS-NWFSC-24, 258 p.

Federal Register Notices Cited

- 64 FR 24049. 1999. Final Rule and Correction: Designated Critical Habitat; Central California Coast and Southern Oregon/Northern California Coasts Coho Salmon Federal Register 64:24049-25507. May 5, 1999.
- 70 FR 37160. 2005. Endangered and threatened species: final listing determinations for 16 ESUs of West Coast Salmon, and final 4(d) protective regulations for threatened salmonid ESUs. Federal Register 70: 37160-37204.
- 70 FR 52488. 2005. Endangered and threatened species; designation of critical habitat for seven evolutionarily significant units of Pacific salmon and steelhead in California. Federal Register 70: 52488-52627.
- 71 FR 834. 2006. Endangered and threatened species: final listing determinations for 10 distinct population segments of West coast steelhead. Federal Register 71: 834-862.

U.S. DEPARTMENT OF COMMERCE
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION

National Marine Fisheries Service
Santa Rosa Area Office
777 Sonoma Avenue, Room 325
Santa Rosa, California 95404-6515



*National Park Service
FORT MASON
Golden Gate National Recreation
San Francisco, Calif*


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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.

Mr. Brian O'Neill

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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

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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.

Mr. Brian O'Neill

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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

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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

Mr. Brian O'Neill

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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,



Handwritten signature of Randolph H. Sederquist, Chief, Public Safety Division.

cc: Resources Agency
Richard Rayburn, Natural Resources Division

HW:RS:III:GGRRA Dog Mng



State of California • Natural Resources Agency

Edmund G. Brown Jr., Governor

DEPARTMENT OF PARKS AND RECREATION
P.O. Box 942896 • Sacramento, CA 94296-0001

Major General Anthony L. Jackson, USMC (Ret), Director

February 24, 2014

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

RECEIVED

FEB 25 2014

SUPERINTENDENT'S OFFICE

Attn: SEIS

Dear Mr. Dean,

Thank you for the opportunity to comment on the Supplemental Environmental Impact Statement (SEIS) for the Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan (the Plan). It is clear that the Plan represents years of diligent research, data compilation and analysis. The California Department of Parks and Recreation (State Parks) shares an abiding interest with the National Park Service (NPS) in ensuring that visitor-serving dog management is undertaken in a way that ensures the protection of the valued natural and cultural resources we are charged to protect.

State Parks is responsible for the protection and management of resources throughout the State Park System (SPS). After review of the Draft SEIS, we are concerned about how the resources in State Park units adjacent to GGNRA may be affected by implementation of this Plan. We are particularly concerned about the direct influence that changes in GGNRA dog management policy may have on visitor use of State Park lands, but also on the indirect influence of this Plan on the management and policy of State Parks. We have identified the SPS lands adjacent to the sites addressed in the Plan, as well as potential impacts to these park units from implementation of the GGNRA Preferred Alternative F. Our comments below address the Plan's proposed monitoring-based management approach and the analysis of impacts, as well as the sections on visitor compliance and law enforcement, education and outreach, and partnerships and plan implementation. As requested, comments are primarily focused on the sections of the SEIS that have been changed in this version, as indicated in the Readers' Guide provided by GGNRA.

By nature of their shared boundaries or close proximity with State Park property, we have identified the following GGNRA SEIS project sites with potential to impact resources, recreation uses, and park operations in the indicated SPS units/property. We request that GGNRA consider potential effects to the management and operation requirements for these park units, as well as to their resource and recreational values in the final GGNRA Dog Management Plan:

Sites identified for dog use adjacent to SPS land in the Marin District (Marin County)

- Miwok Fire Road from Tennessee Valley to Hwy 1: Miwok Fire Road transitions to Miwok Trail as it moves onto State Park land north of Hwy 1.
 - Alternative F, GGNRA Preferred Alternative: On-leash: Lower Rodeo Valley Trail Corridor: Miwok Trail.

- Homestead Valley: Homestead Valley is directly east of Dias Ridge and the Dias Ridge Trail at Mount Tamalpais State Park (SP).
 - Alternative F, GGNRA Preferred Alternative: Homestead Fire Road, and neighborhood connector trails (Homestead Trail and Homestead Summit Trail) to be designated in the future: on-leash.
- Stinson Beach: Stinson Beach lies to the west and north of Mount Tamalpais SP. The Dipsea Trail passes from GGNRA to State Park lands near Stinson Beach.
 - Alternative F, GGNRA Preferred Alternative: On-leash with on-leash path to Upton Beach added from north parking lot.
- Muir Beach: Muir Beach is situated west of Dias Ridge in Mount Tamalpais SP and near the GGNRA section of the Dias Ridge Trail which extends onto State Park lands and near the Mount Tamalpais SP trailhead for the Redwood Creek Trail.
 - Alternative F, GGNRA Preferred Alternative: Beach, bridge and path to beach, and Muir Beach Trail (trail to be built as part of Muir Beach Wetland and Creek Restoration Project): on-leash with fencing along the dunes and lagoon.

Site identified for dog use adjacent to SPS land in Santa Cruz District (San Mateo County)

- Rancho Corral de Tierra: Rancho Corral de Tierra is directly east of Montara SB/McNee Ranch – GGNRA and State Parks land and trails are contiguous, as is the county road. Gray Whale Cove SB is across Hwy 1.
 - Alternative F, GGNRA Preferred Alternative: On-leash dog walking would be allowed on designated trails in two areas open to dog walking near Montara and El Granada.

GGNRA Dog Management Plan SEIS sites and GGNRA Preferred Alternative F

Where GGNRA and State Parks lands adjoin we request the agencies work together to develop consistent regulations. In general, State Parks does not allow dogs on trails. Dogs are only permitted in developed areas (parking lots, picnic areas, campgrounds) if kept on a leash (maximum six feet) or contained in a car, tent, or enclosure. Where GGNRA regulations will be less restrictive than state park regulations, we are concerned about potential impacts to state park resources and visitor safety from GGNRA visitors and their dogs, on-leash and off-leash, crossing from GGNRA property onto State Parks property.

- State Parks requests that the above potential management conflicts be addressed by GGNRA.
- GGNRA should address how compliance with State Park policy regarding visitors/dogs that cross from GGNRA to State Parks property will be handled.

The SEIS identifies potential impacts on adjacent lands but does not address how they would be minimized or mitigated. Clear signage and education/outreach could help to ensure visitor knowledge of and compliance with State Park policy and regulations.

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- State Parks requests that GGNRA install signage designed to alert visitors that they are moving from GGNRA to Mount Tamalpais SP and other State Park properties, and that dogs are prohibited on State Park lands.
- In order to reduce impacts to adjacent State Park lands, we also request that GGNRA provide outreach and education materials that include boundaries of GGNRA and State Park lands, and the State Parks dog regulations.

GGNRA Dog Management SEIS Proposed Management Approach

The GGNRA Dog Management Plan SEIS Preferred Alternative F proposes improved regulation of dog-related recreation at GGNRA, and strives to provide "balanced use" of the GGNRA. However, many objectives of the Plan (especially those pertaining to natural and cultural resources protection) and the analyses of impacts of all six alternatives hinge upon assumptions of 1) adequate monitoring of park resources and visitor use through a "Monitoring-Based Management Strategy" to assess impacts, 2) visitor compliance, and 3) sufficient enforcement of regulations. All of these may be difficult to achieve in practice. An adaptive management approach will require both short-term and long-term investment and ongoing coordination with key stakeholders.

Monitoring-Based Management Strategy

The Plan change from the previously proposed compliance-based management strategy to the currently proposed monitoring-based management strategy has added natural and cultural resource monitoring to the monitoring of compliance. The Plan states the timeline for implementation of this approach, and says monitoring will continue in all areas for at least four years.

- Full visitor compliance will be difficult if not impossible to achieve. Furthermore, the user population is dynamic (i.e., there will always be different/new users). These two facts alone suggest that monitoring should be in place permanently, though monitoring can certainly be designed to taper with increased compliance.
- Focusing on areas of demonstrated noncompliance may lead to a very wide focus initially that similarly must be flexible and able to be adjusted over time as compliance shifts.
- The level of staff and other park resources and costs required to address dog management should be monitored to inform future budget proposals and management guidelines.

State Parks prefers that dogs not be allowed on trails that continue onto State Parks property, especially as new areas open to dog use. If trails that continue onto State Parks property are made available for dog use, GGNRA should conduct related monitoring and enforcement activities to prevent resource impacts on State Park lands. State Parks does not have the

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capacity to enforce or to monitor impacts of dog use on State Parks property to the level identified in the SEIS as part of the GGNRA monitoring-based management strategy

- We request that a specific focus of the Monitoring Plan be developed as part of implementation of the Dog Management Plan to include monitoring of visitors/dogs crossing onto adjacent DPR lands.
- At sites where trails, roads, and/or other access points occur between NPS and DPR lands (e.g. the GGNRA Miwok Road junction with State Parks Miwok Trail), we request that monitoring of impacts on adjacent lands be included as part of the cumulative impacts of the Dog Management Plan.

The Plan states that this current change in management strategy removed automatic triggers for more stringent regulation based on monitoring results. While such a monitoring approach may be better informed by data, we are concerned that "flexible" management responses may take additional time to achieve performance responses in the field. Specifically, without automatic triggers and set management responses, each attempt to re-evaluate a situation has the potential for greater controversy and de facto negotiation of standards. In addition, State Parks believes that:

- The longer timeframe could jeopardize the resource protection objectives of the Plan.
- Effects to visitors who feel threatened or do not want the dog experience for other reasons should be addressed in the Plan.

Site specific thresholds should be developed that would take visitor use, resources and other unique site factors into account. The Plan states that the uniform percentage-based thresholds of the compliance-based management strategy were replaced because the differing contexts at individual sites would lead to divergent outcomes and not uniform protection of resources.

Impacts Analyses

The analyses of impacts of the six alternatives and of the cumulative impacts are all predicated on the assumption of visitor compliance. From prior experience with dog management, this assumption is unrealistic. As such, it calls into question the stated potential impacts of the alternatives and the cumulative effects of the Plan. This is particularly the case when the plan identifies "no impact," "negligible impact," or "low/minor impact."

- Although the Plan states certain alternatives will have "no impact" due to dogs being prohibited, with the stated level of enforcement, dogs (particularly off-leash), may still be causing impacts when law enforcement staff are absent.
- The Plan predicts that impacts will decrease to become minor after the initial education and enforcement period, however there will always be new users in the park who have not yet been educated, and an unknown percentage of repeat users will always be noncompliant.

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Visitor Compliance and Law Enforcement

Monitoring is essential and should be a primary component of dog management; however without enforcement the Plan cannot deliver on its objectives. Many dog owners may feel that it is a joy for most people to see dogs play and run free. Many dog owners may feel that their dogs have a right to the parks. Others may not differentiate the national- or state-significant resources of GGNRA and State Parks from local city parks or dog parks. Given these and other considerations, even the most law-abiding citizens may be tempted to turn scofflaw if "no one is looking." The Plan states that "park staff members routinely observe dog owners leashing their pets when law enforcement personnel are noticed", and that some dog owners "refuse to leash their dogs when informed of the leash requirement by non-law enforcement staff". The Plan also includes visitors' opinion that the sparse presence of rangers and uncommon ticketing and education has resulted in more non-compliance.

With nine law enforcement staff per shift monitoring approximately 80 miles of park sites it stands to reason that the number of incidents reported likely significantly understates the actual amount of non-compliance and number of dog incidents in the parks. The Plan also notes the increase in visitor conflict when GGNRA initiated enforcement of the leash regulations, to the extent that rangers now approach visitors in pairs, assuming any contact regarding dog walking regulation compliance will be confrontational. This discussion, in the Plan, belies the notion that non-compliant dog owners are in all cases simply uninformed people who would be willing to change their behaviors if only they knew the rules and the reasons for them. Instead, it supports a conclusion that many park-visitor dog owners know the regulations and choose to disregard them unless law enforcement is present.

- "Visitor noncompliance with regulations" and "ability of law enforcement staff to enforce rules" are recognized as two of the Current Dog Management Issues. The Plan must clearly state what would be done differently from past law enforcement efforts to implement this Plan.
- The Plan does not indicate increased law enforcement presence; however gaining compliance would probably require additional staff, at least for a time period. Stated management options such as banning a particular problematic dog from the park would require more frequent law enforcement presence.
- The Plan states that "the number of incidents of noncompliance at any zone must be measured against the total number of dogs and/or dog walkers in the area during monitoring", however it is not the proportion of dogs present in non-compliance that matters, it is the number of dogs creating problems and the degree of impacts they cause.

- Would a concentrated enforcement effort make a difference? We think that there is a possibility, as word travels fast for at least a subset of dog walkers who utilize communication media such as email, social media, and informal networking. In this case, a team of two law enforcement staff at each site to educate, test for voice control, and ticket noncompliant dog owners in front of others might communicate consistency and assure all park users that a change has happened. Constant law enforcement attendance for at least a period in the beginning of implementation of the Plan, a period of time deemed necessary to reach the regular users for several times out dog walking, might help create new behaviors (hopefully more desirable behaviors) and acceptance of the new program. Staffing up, even temporarily, would be a wise investment by helping to ensure the considerable investment NPS has already made in the development and evolution of the Plan is not wasted.
- Where compliance proves elusive, appropriate fencing should be reconsidered. State Parks recognizes the importance of aesthetics in the park setting and also tries to limit intrusive or unwarranted fencing and signage. However, given the challenges of voice control in a natural/wild setting, and the risk of losing natural or cultural resource values in State Parks, or compromising visitor experience, health or safety, sensitive areas and off-leash areas may need strategically-placed fences.

Education and Outreach

With different zones of the GGNRA subject to different dog regulations (no dogs, on-leash dog walking, dog walking under voice and sight control in regulated off-leash areas), coupled with adjacent land managers that may have different dog regulations, visitor education and clear delineation of different dog management zones will be essential to avoid confusion, support compliance/enforcement, and promote resource protection. The proposed long-term public outreach campaign seems pivotal to the success of the Plan, particularly the dog walkers' guide and new, consistent, strategically-placed signage.

- Information distribution will be essential to a successful outcome. Consider posting information (and a map) and making the dog guide available at pet stores and other places people need to frequent for dog care.
- Social media, along with other innovative methods, should be utilized to broadcast information.
- The low rate of response (13%) to the GGNRA Dog Walking Satisfaction Visitor Study may indicate that many of the 7,000 persons and organizations on the GGNRA's dog management plan/EIS mailing list either did not get the survey or were not invested enough to respond. This route of communication to stakeholders may not be as effective as desired.
- Signage and/or interpretive materials for the park or for individual sites may need to include a statement that those visitors who do not want a dog experience may consider visiting one of the other attractive destinations in the park.

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- Interpretive materials showing beach sites and dog regulations should also include information on sites available for dog-free recreation. A table could give all visitors a visual depiction of how the limited beach resource is being shared.
- At a minimum, a list of dog-free recreation sites should be made available to visitors. If that is a short list compared to areas where dogs are allowed, the balance of the Plan may need to be revisited.

Partnerships and Plan Implementation

The Plan stresses communication and cooperation with stakeholders, and includes these dog walking groups as part of the implementation of the Plan, specifically in education and outreach to their members, however they may be more informed and amenable to the need for management of dog impacts. Not all dog walkers join active groups or follow the issue via media, the web, etc. - they just want to walk their dogs, and there will always be new, uninformed dog walkers as well. These people may not be exposed to any other information than signage and/or staff and volunteers on site.

- To determine the efficacy of this part of the Plan, it might be useful to survey beach users to determine the percentage of dog walkers that are and are not part of organized groups, as well as those that follow social media or obtain dog information by other means.

How would GGNRA deal with cost overruns in the event that effective implementation of the management-intensive Plan and development of the peer-reviewed monitoring plan exceeds projected costs or budget cuts jeopardize funding? Budget and staffing constraints and how they would affect the Monitoring-Based Management Strategy should be addressed.

- For instance, would dog restrictions increase, additional areas be closed, or monitoring capacity be reduced if funds are cut or unavailable?

The Plan includes expectations that park operations budget impacts would be front-loaded but decrease over time; it refers to prioritization of monitoring but it also states that GGNRA has multiple competing priorities to address with its funding and does not have unlimited resources with which to ensure compliance with dog regulations.

- Resource protection values could be compromised if the "burden of proof" for stricter dog regulations lies in documentation of impacts through monitoring. It becomes completely untenable if such monitoring is being conducted is at an insufficient level to adequately determine compliance and resource impacts.

We request that the final GGNRA Dog Management Plan provide enforceable regulations to effectively protect the natural and cultural resources of the park and adjacent State Park lands while best serving various park users.

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We appreciate the time and effort GGNRA has invested in researching and developing this document; it may be seen by some as establishing a precedent in dog recreation management, not only for NPS but also for State Parks and other land managers charged with protecting resources of national and statewide significance. Thank you again for the opportunity to comment on the SEIS. If any of our comments need clarification or further explanation, please feel free to contact me at (916) 653-6725 or jay.chamberlin@parks.ca.gov, or Laurie Archambault, Natural Resources Division Environmental Program Manager, at (916) 653-6725 or laurie.archambault@parks.ca.gov.

Sincerely,



Jay Chamberlin, Chief
Natural Resources Division

cc: Danita Rodriguez, Bay Area District Superintendent, California State Parks
Aaron Robertson, Chief Deputy Director, California State Parks
Steve Lehman, Deputy Director for Park Operations, California State Parks

Presidio Trust

Status: Reviewed	Park Correspondence Log:
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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.

PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 4390

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Correspondence Text

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 lead 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.



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-SUPT)

SEP - 5 2013

Craig Middleton
Executive Director
Presidio Trust
103 Montgomery Street
P.O. Box 29052
San Francisco, CA 94129

**Subject: Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan /
Supplemental Environmental Impact Statement (CEQ #20110004)**

Dear Mr. Middleton:

Attached please find the Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS). The National Park Service (NPS) welcomes your comments as a cooperating agency pursuant to the National Environmental Policy Act of 1969 and the Council on Environmental Quality's implementing regulations at 40 C.F.R. 1500 *et. seq.*, for those GGNRA lands adjacent to Presidio Trust lands.

The purpose of this letter is to inform you that a supplemental EIS (SEIS) has been completed for this project to fully respond to substantive public comment received on the draft plan/EIS, including comments from the Presidio Trust. To address the substantive agency and public comments on the draft plan/EIS, the NPS incorporated a number of changes to the draft plan/SEIS, including the following:

- The addition of new data (including additional law enforcement and visitor use data).
- The incorporation of new references.
- Additional *Americans with Disabilities Act* (ADA) information.
- Changes to the impacts analysis (including additional analysis of potential redistributive effects of opening/closing areas to dog walking).
- Changes to the compliance-based management strategy (now referred to as the monitoring-based management strategy) by including natural and cultural resource monitoring and removing automatic triggers and restrictions.
- Evaluation of additional fencing as a method to minimize dog walking impacts.

- Relatively minor changes to some site-specific elements of the preferred alternative.
- Addition of a range of reasonable alternatives and analysis for the site recently transferred to GGNRA, Rancho Corral de Tierra (Rancho).

The draft plan/SEIS describes six alternatives at 22 sites, including the preferred alternative, for the management of dog walking activities at GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. Alternative F is the preferred alternative, and was altered for some sites partly in response to public comments received on the draft plan/EIS. Alternative F provides a variety of visitor uses (no dogs, on-leash dog walking, and dog walking under voice and sight control in ROLAs) as well as protection of visitor safety and experience, and natural and cultural resources.

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 Recommendation to the General Superintendent regarding on and off leash dog walking. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. However, the draft plan/SEIS 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 22 sites under consideration for this plan/SEIS and the project area are shown in the attached Figure 1.

The objectives of the Plan/SEIS include:

- Provide a clear, enforceable dog management policy
- 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

In response to comments on the 2011 draft plan/DEIS from the Presidio Trust and others regarding the potential redistributive effects of regulating dog walking, a new section was added to the draft plan/SEIS in Chapters 3 and 4 to describe in more detail the nearby dog walking areas (outside of GGNRA) that may experience the effects of redistribution as a result of implementation of the new dog management regulation for GGNRA. The NPS conducted a survey in the summer of 2012 (*GGNRA Dog Walking Satisfaction Visitor Study*) to evaluate the potential for redistribution of users due to access changes resulting from that implementation. GGNRA used the best available data, gathered by that survey, to determine where GGNRA visitors may go as a result of the draft plan/SEIS and the impacts associated with this redistribution. A total of 18 nearby dog walking areas that visitors would likely relocate to were analyzed in the draft plan/SEIS; existing resources at each of these nearby areas are included in Chapter 3. Impacts to natural resources, visitor experience,

visitor safety, and park operations (maintenance and cost) for each of these sites are included when applicable in the analysis for each alternative in Chapter 4 of the draft plan/SEIS.

If you have any questions please contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your review.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Dean".

Frank Dean
General Superintendent
Golden Gate National Recreation Area

Attachment:

Figure 1 – Vicinity Map





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.

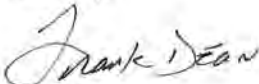
Based on analysis within the Draft EIS, the Preferred Alternative should, over the long term, provide beneficial effects to coastal resources by: 1) minimizing access to the surface waters of San Francisco Bay and the Pacific Ocean adjacent to the applicable GGNRA sites; 2) reducing opportunities for 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



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-SUPT)

SEP - 5 2013

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 Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan / Supplemental Environmental Impact Statement

Dear Mr. Simon:

Attached please find the Draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS). The National Park Service (NPS) will be seeking concurrence from your agency that the Plan to be implemented is consistent with the Federal Coastal Zone Management Act of 1972, as amended.

A letter was sent to the Coastal Commission in January, 2011, along with a copy of the draft Golden Gate National Recreation Area (GGNRA) draft Dog Management Plan/Environmental Impact Statement (draft plan/EIS). The purpose of this letter is to inform you that a supplemental EIS (SEIS) has been prepared for this project to fully incorporate public comment received on the draft plan/DEIS. Release of the SEIS gives the NPS the opportunity to receive comment from the public on this new information before the NPS issues a Notice of Proposed Rulemaking, the final plan/EIS and record of decision, and final rule.

To address substantive public comments on the draft plan/EIS, the NPS incorporated a number of changes to the draft plan/SEIS, which include the following:

- The addition of new data (including additional law enforcement and visitor use data)
- The incorporation of new references
- Additional *Americans with Disabilities Act* (ADA) information
- Changes to the impacts analysis (including additional analysis of potential redistributive effects of opening/closing areas to dog walking)
- Changes to the compliance-based management strategy (now referred to as the monitoring-based management strategy) by including natural and cultural resource monitoring and removing automatic triggers and restrictions
- Evaluation of additional fencing as a method to minimize dog walking impacts,

- Relatively minor changes to each site specific preferred alternative
- A site recently transferred to GGNRA, Rancho Corral de Tierra (Rancho), was added to the park sites specifically addressed by the plan and a range of reasonable alternatives for the site was developed and is analyzed in this draft plan/SEIS.

The draft plan/SEIS describes six alternatives at 22 sites, including the preferred alternative (alternative F), for the management of dog walking activities at GGNRA, and details the resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. Alternative F is the preferred alternative, and was altered in part in response to public comments received on the draft plan/EIS. Alternative F provides a variety of visitor use (no dogs, on-leash dog walking, and dog walking under voice and sight control in ROLAs) as well as protection of natural resources, cultural resources, and visitor safety.

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; visitor experience; consultation with tribes and federal and state agencies; and the Federal Panel Recommendations on Dog Walking to the General Superintendent. GGNRA encompasses approximately 80,500 acres in San Francisco, Marin, and San Mateo counties. However, the draft plan/SEIS 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. These lands are excluded from the coastal zone, as they are wholly owned federal land, managed by the National Park Service, Department of the Interior. The 22 sites under consideration for this draft plan/SEIS and the project area are shown in the attached Figure 1.

The objectives of the draft plan/SEIS include:

- Provide a clear, enforceable dog management policy
- 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

This draft plan/SEIS 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. These conflicts will likely continue to escalate if not addressed in a comprehensive manner.

Based on analysis within the draft plan/SEIS, the Preferred Alternative should, over the long term, provide beneficial effects to coastal resources by: 1) minimizing unleashed dog 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) protecting and conserving sensitive species and habitats by prohibiting access to sensitive areas; 4) requiring control of dogs by owners at all times; 5) increasing compliance with dog waste removal, and 6) enhancing visitor experience and safety.

Based on the anticipated benefits to coastal resources the NPS is confident the draft plan/SEIS 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 draft plan/SEIS. After your review and consideration of NPS's intention of submitting a "Negative Determination", the NPS requests confirmation this approach will gain concurrence from your agency. We would appreciate receiving that confirmation by the close of the public comment period for the draft plan/SEIS.

If you have any questions regarding this request please contact Shirwin Smith, at (415) 561-4947, or email at shirwin_smith@nps.gov. Thank you for your consideration.

Sincerely,



Frank Dean
General Superintendent,
Golden Gate National Recreation Area

Attachment:

Figure 1 – Vicinity Map



State of California Department of Fish and Game

PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 4315

Author Information

Keep Private: No

Name: Carl Wilcox

Organization: State of California Department of Fish and Game  Official Rep.

Organization Type: S - State Government

Address: 7329 Silverado Trail
Napa, CA 94558
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Correspondence Information

Status: Reviewed Park Correspondence Log:

Date Sent: 04/11/2011 Date Received: 04/25/2011

Number of Signatures: 1 Form Letter: No

Contains Request(s): No Type: Letter

Notes:

Correspondence Text

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 lessingia. 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 lessingia 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

Marin Municipal Water District

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"

<Shirwin_Smith@nps.gov>
<cmay@marinwater.org>

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

Marin County Parks and Open Space Commission

August 10, 2006

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

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

RECEIVED
AUG 14 2006
SUPERINTENDENT'S OFFICE

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

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



San Francisco Animal Care and Control


PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 4713

Author Information

Keep Private: No

Name: Rebecca Katz

Organization: Animal Care and Control Department, City and County of San Francisco  Official Rep.

Organization Type: C - County Government

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USA

E-mail:

Correspondence Information

Status: Reviewed Park Correspondence Log:

Date Sent: 05/30/2011 Date Received: 05/27/2011

Number of Signatures: 1 Form Letter: No

Contains Request(s): No Type: Letter

Notes:

Correspondence Text

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

Elected Officials – Federal, State, County or Town


PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 1890

Author Information

Keep Private: No

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

Organization Type: F - Federal Government

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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

Author Information

Keep Private: No
Name: Pete and Helen McCloskey
Organization: Former Congressman ;  Member
Organization Type: F - Federal Government
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USA
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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 05/25/2011 Date Received: 05/31/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: E-mail

Notes:

Correspondence Text

Congressman Pete and Helen McCloskey
Rumsey Farms P.O. Box 3 Rumsey, CA
95679 530-796-2124 filly6@aol.com

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

PEPC Project ID: 11759, Document ID: 38106

Correspondence: 4690

Author Information

Keep Private: No

Name: Jackie Speier

Organization:

Organization Type: F - Federal Government

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Correspondence Information

Status: Reviewed Park Correspondence Log:

Date Sent: 05/27/2011 Date Received: 06/03/2011

Number of Signatures: 1 Form Letter: No

Contains Request(s): No Type: Letter

Notes:

Correspondence Text

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

PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 4694

Author Information

Keep Private: No

Name: Alana Paull

Organization: Office of Congresswoman Jackie Speier;  Member

Organization Type: S - State Government

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Correspondence Information

Status: Reviewed Park Correspondence Log:

Date Sent: 05/27/2011 Date Received: 05/27/2011

Number of Signatures: 1 Form Letter: No

Contains Request(s): No Type: E-mail

Notes: Attachment enclosed

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

PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 4213

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Correspondence Text

May 30, 2011

Frank Dean
General Superintendent
GGNRA, Building 201
Fort Mason
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.

PEPC Project ID: 11759, DocumentID: 38106

Correspondence: 3934

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Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form

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Correspondence Text

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

Correspondence: 4688

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Number of Signatures: 1 Form Letter: No

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Correspondence Text

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

PEPC Project ID: 11759, DocumentID: 55416

Correspondence: 362

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Correspondence Text

October21, 2013

Frank Dean, Superintendent

National Park Service - Golden Gate National Recreation Area

Building 201, Fort Mason

San Francisco, CA 94123

Dear Frank,

I would like to comment on the most recent version of the GGNRA DRAFT Dog Management Plan (Plan). As I reviewed the Preferred Alternatives (Alternatives), I am concerned over the effect the implementation of the Alternatives may have on the San Mateo County Midcoast, City of Pacifica, and visitors.

Throughout the process conducted to produce the Plan, I heard residents of San Mateo County ask not to have trail access for dog walkers reduced. As I reviewed the Alternatives, I am concerned by how many trails are being prohibited to dog walkers. By prohibiting access to trails used for decades by both dog walkers and non-dog walkers, it may discourage people from using the parks and trails. Furthermore, many women have expressed to me, including my own wife, that without their dog they would not feel safe walking on open space trails. Having their dog present provides a level of security that otherwise would not be provided.

In addition to the aforementioned issues, I have concerns over the potential impact this can have on San Mateo County's coastal communities. By reducing the amount of trails people can access with their dogs and citing people for violations, GGNRA will be discouraging people from engaging in outdoor activities and enjoying their national park lands.

GGNRA states that they have selected the Alternatives because it grants multiple user groups the opportunity to enjoy the property, allows for habitat restoration, and is justifiable and enforceable by NPS Rangers. For decades, dog walkers, non-dog walkers, mountain bikers and horseback riders have all enjoyed the trails that are now managed by GGNRA. Multiple user groups have been enjoying the trails together in the past and should be able to continue to do so. Additionally, as the County has proven through projects conducted at San Bruno Mountain, habitat restoration can be successful while still providing recreational opportunities for

a variety of visitors. Given these points and the strong desire by dog walkers and the community to continue to use these trails, I suggest that it may be difficult for GGNRA and the NPS Rangers to effectively enforce the Alternatives.

I ask that you reconsider your Alternatives and not place such heavy restrictions on trails currently used by dog walkers. Thank you.

Sincerely,

Don Horsley


Supervisor, District 3

San Mateo County

PEPC Project ID: 11759, DocumentID: 55416

Correspondence: 1189

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Correspondence Text

December 19, 2013
Frank Dean, General Superintendent
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94 123-0022
RE: Comments regarding the Golden Gate National Recreation Areas Draft Dog Management Plan and Supplemental Environmental Impact Statement and Ocean Beach

Dear Mr. Dean,

As strong supporters of our national parks, we wish to commend your efforts to preserve the resources and values in our parks for the use of future generations and to align your dog management policy with NPS regulations. However, our offices, jointly representing the constituency living near or using Ocean Beach for public recreation, have heard from our communities their serious concerns regarding the Supplemental Environmental Impact Statement (SEIS). We are primarily concerned with the loss of dog walking opportunities as presented by the Preferred Alternative as well as the impact this will have on our City parks.

Under the Preferred Alternative in the 2013 Supplemental Environmental Impact Statement, 80% of Ocean Beach would be closed to dogs, where currently 100% of Ocean Beach is open to some form of dog walking. The Preferred Alternative would leave only the portion North of Stairwell 21 would be open to dogs. Furthermore:

- In the Ocean Beach Snowy Plover Protection Area, dogs would no longer be allowed on or off leash. Currently, dogs are allowed on leash year-round and off leash with voice control for 47 days.
- In the area North of Stairwell 21, there would be a regulated off-leash area (ROLA) with dogs under voice and sight control where currently, dogs are allowed off leash under voice control.
- South of Sloat Boulevard, no dogs would be allowed where currently dogs are allowed off leash under

voice control.

Reducing available open space for dog walking on or off leash will strain our City's Parks and open spaces. The Ocean Beach Trail along Great Highway, which is cited multiple times throughout the SEIS as an available on leash dog walking area within the Ocean Beach Snowy Plover Protection Area, is actually under the jurisdiction of the San Francisco Recreation and Park Department. This trail also is already constrained by its multiple uses, including pedestrians, bicyclists, joggers, and dog walkers. It is further constrained due to its width of approximately ten feet. Removing dog walking from this portion of Ocean Beach would put further pressure on this already heavily used pathway.

Furthermore, District 4 contains only two off-leash dog play areas managed by the Recreation and Park Department in its boundaries, both of which are located in Stern Grove, over one mile away from Ocean Beach. Without an adequate analysis of how closing 80% of Ocean Beach to dogs would impact our City dog play areas and the maintenance load of our City departments, we cannot support the Preferred Alternative.

Similarly, District 1 contains three off-leash dog play areas that are managed by the Recreation and Park Department and would also, potentially, suffer negative impacts should the Preferred Alternative be implemented.

With over 120,000 dogs in San Francisco, balancing recreational opportunities for our communities is paramount. We are supportive of a more balanced approach for Ocean Beach. In the SEIS, Alternative E is the most balanced option for Ocean Beach. Alternative E would allow dogs off leash under voice and sight control North of Stairwell 21 and on leash in the Snowy Plover Protection Area and South of Sloat Boulevard. This would keep 100% of Ocean Beach open to some form of dog walking but would additionally eliminate visitor confusion about the seasonal leash restriction in the Snowy Plover Protection Area. We believe that this alternative could, with adequate enforcement of leash restrictions, make Ocean Beach a place where people, dogs, and wildlife can coexist.

We remain committed to working with you and your team toward a dog management policy that represents the values of the Golden Gate National Recreation Area (GGNRA) and also best serves our community. Should you have any questions regarding our comments on the SEIS, please do not hesitate to contact our offices.

Sincerely,
Eric Mar
District 1
San Francisco Board of Supervisors

Katy Tang
District 4
San Francisco Board of Supervisors

cc: Nancy Pelosi, Congresswoman 12th District
Dianne Feinstein, United States Senator
Jackie Speier, Congresswoman District
Leland Yee, California State Senator District 8
Mark Leno, California State Senator District 11
Phil Ting, California State Assemblymember District 19

Edwin Lee, San Francisco Mayor
David Chiu, President, Board of Supervisors
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Jane Kim, Supervisor District 6
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John Avalos, Supervisor District 11
Norman Yee, Supervisor District 7
Phil Ginsburg, General Manager San Francisco Recreation and Park Department
Mohammed Nuru, Director San Francisco Department of Public Works
Rebecca Katz, Director San Francisco Animal Care and Control
">

JARED HUFFMAN
2nd DISTRICT, CALIFORNIA

COMMITTEE ON
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*F. Dean
By: H. Smith*

February 18, 2014

RECEIVED

MAR - 3 2014

SUPERINTENDENT'S OFFICE

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

Dear Superintendent Dean:

I appreciate your efforts on behalf of Golden Gate National Recreational Area (GGNRA) to undergo review of policies related to management of dogs in GGNRA that has been underway since 2005. As the public comment period for the Supplemental EIS for the Dog Management Plan with a Preferred Alternative "F" closes on February 18, I am writing to request special attention be paid to the comments relating to GGNRA area in Marin County.

My constituents recognize GGNRA has been managed as a metropolitan recreation area distinct from all other National Parks, Wilderness Areas and Monuments and is revising regulations to protect sensitive habitat and enhance visitor experience in light of the changing patterns of use. I am hearing from responsible dog owners that do not want to lose access to hiking trails they have used for years. I am also hearing from members of the community that have grave concerns about potential damage from dogs on sensitive habitat and those that believe dog-related recreation is degrading the park experience for some user groups.

Striking the balance between recreation with dogs and protection of habitat and respect for members of the public seeking to recreate without dogs is a challenge. I would like to sit down with you to discuss the Marin County Board of Supervisors Resolution that you revisit Alternative "F."

I know you welcome and appreciate the thoughtful suggestions which are generated through the public comment process and will give the appropriate consideration they are due.

Respectfully,

Jared Huffman

JARED HUFFMAN
Member of Congress

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PRINTED ON RECYCLED PAPER

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.

APPENDIX M: CONCERN RESPONSE REPORT

GGNRA DOG MANAGEMENT PLAN

DRAFT DOG MANAGEMENT PLAN / SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

Report Date: 11/26/2016

AD1100 - Alternative Development: Comments to Process

CONCERN STATEMENT: (Concern ID: 53294) Several concerns were expressed about the work of the Negotiated Rulemaking Committee. Concern was expressed about the process used by the committee, specifically who could participate and what topics could be discussed. It was also stated that the draft plan/SEIS did not incorporate the results of the committee's work.

Representative Quote(s):

Corr. ID: 4276 Organization: Not Specified Comment ID: 362349 Organization Type: Unaffiliated Individual

Representative Quote: I live in San Mateo County and served as an alternate on the negotiated rule making committee representing Pacifica. (San Bruno was left out of the negotiations as well as the residents of the coastside communities of Montara and Moss Beach south of Pacifica who have been severely impacted by the Dog Management Plan.) The units in San Mateo County were never actually discussed-each time Jeri Flinn attempted to bring them up, she was told "not now". Cattle Hill (which the NPS had actually proposed as an off-leash appropriate area) couldn't be discussed because it wasn't actually part of the GGNRA yet! Same was true of Pedro Point and Rancho Corral de Tierra (4000 acres where there has to be space for off-leash recreation). In the "Plan", areas that have been open to on-leash walking are now off limits to dogs (and therefore their people).

We went into the Negotiated Rule Making in order (as the NPS said) to make a long time use of areas in the GGNRA legitimate (though a federal judge had indeed found that the 1979 Pet Policy was a legitimate policy). Instead, the NPS used the process to severely restrict a recreational use that thousands of Bay Area residents enjoy on a daily or weekly basis.

Corr. ID: 5815 Organization: Not Specified Comment ID: 364358 Organization Type: Unaffiliated Individual

Representative Quote: The Negotiated Rulemaking Committee worked very hard to come up with a plan that had consensus among the many GGNRA stakeholders. Alternative F disregards the majority of the consensus recommendations from the Committee. I support Alternative C as the best alternative for revising the plan. I am strongly opposed to Alternative B which severely limits my ability to participate in GGNRA outdoor recreation.

Corr. ID: 6687 Organization: Not Specified Comment ID: 369173 Organization Type: Unaffiliated Individual

Representative Quote: Despite the fact that GGNRA management had been given permission to create a Section Seven Special Regulation for off-leash recreation in the GGNRA by the Federal Panel and by the Court when the Court reinstated the 1979 Pet Policy, the Superintendent refused to make the 1979 Pet Policy a Section Seven Special Regulation. He instead instituted a Negotiated Rulemaking (NR) process that was conducted in bad faith, was unlawful and did not reach consensus. The GGNRA refused to acknowledge the 1979 Pet Policy as the logical starting point for NR. In fact, the 1979 Pet Policy was not listed as a document the NR Committee would be able to refer to within the NR process. The GGNRA continued to cling to their view that the 1979 Pet Policy was an illegitimate document which NEVER had the power of law despite the contrary findings of the Court.

Response: The Negotiated Rulemaking Committee was established following the Advanced Notice of Proposed Rulemaking as a mechanism to facilitate a consensus on where and how dog walking should be allowed in GGNRA, given its mission as a national park unit. It was established following the strict protocol provided by the Negotiated Rulemaking Act. Members consisted of representatives of various organizations, including environmental groups, off-leash dog proponents, youth and elderly advocates, other park users and other stakeholders. Regular meetings were held from 2005-2007, with the process facilitated by the US Institute for Environmental Conflict Resolution. The committee found limited consensus, which the NPS incorporated into the draft plan/EIS, draft plan/SEIS, and final plan/EIS. Consensus agreement was also reached on the Guiding Principles, which form the primary basis of the Objectives of the plan/EIS, and by which the alternatives are

measured. Ultimately, the committee voted to not renew their charter due to the limited areas of consensus.

CONCERN STATEMENT: (Concern ID: 53295) The community should have been more involved in the development of alternatives, either through the use of workshops or the consultation of interested groups, such as dog training professionals.

Representative Quote(s):

Corr. ID: 4005 **Organization:** Not Specified **Comment ID:** 368803 **Organization Type:** Unaffiliated Individual

Representative Quote: To improve on the plan, GGNRA should return to the first two goals stated from its Scoping conclusions (page 39 of the draft plan/EIS):

"Work toward community acceptance of the process and the solution" and

"Allow the community to participate, maximizing creative thinking."

To date, other than the reg neg process, NPS has mainly involved the community by providing opportunities to comment on formal plan/NEPA documents. Upon receiving comments, GGNRA has not allowed the community to participate in the planning process until the agency issued its next formal document, many months later. This does not meet the spirit or letter of the above objectives.

For example, NPS has held no design workshops or design charrettes on any potential solutions in any GGNRA unit, a standard method San Francisco and many federal agencies and municipalities use to develop solutions to sensitive or controversial areas or areas with user conflicts.

These techniques were not used in the reg neg process, in the scoping process for the EIS, or in the comment periods on the DEIS or SDEIS. NPS is again requested to recognize both the relevance of urban design and initiate design workshops on focused issues that can help produce a good plan.

Corr. ID: 6435 **Organization:** Not Specified **Comment ID:** 367488 **Organization Type:** Unaffiliated Individual

Representative Quote: My surprise has always been that there has never been any input or consult from Bay Area Dog Training Professionals on this specifically dog focused legislation and its restrictions. The GGNRA and the DEIS reporting has never sought out the advice and suggestions from this highly canine educated population who are here and more than willing to contribute. These people also frequently use these off leash areas because of the benefit it provides to dogs in their care (both personal and professionally) on so many levels: mental stimulation, socialization, exercise and all around positive effect of these factors results in a more behaved dog.

I strongly feel that the draft needs to be redone including the input of dog care professionals along with establishing outreach programs for dog owners on how to respectfully share the park with other users and wildlife.

Response: NPS has engaged the public for their input throughout the extensive planning process, including dozens of public meetings, and over one year of sustained public comment during the NEPA process and rulemaking. See chapter 1 of the final plan/EIS, Advanced Notice of Proposed Rulemaking for details on the public comment period in 2002, for details of the GGNRA negotiated rulemaking process, for information on the scoping process and public participation during development of the draft plan/EIS and draft plan/SEIS, as well as public comment on the proposed rule. Public comments on the draft plan/EIS and draft plan/SEIS were analyzed and resulted in changes to the alternatives analyzed.

CONCERN STATEMENT: (Concern ID: 53296) Historical use of Rancho should have been used as the status quo (alternative A) to accurately depict the years of dog walking, including off leash, at Rancho.

Representative Quote(s):

Corr. ID: 1443 **Organization:** Montara Dog Group **Comment ID:** 405829 **Organization Type:** Recreational Groups

Representative Quote: The Montara Dog Group's "preferred alternative" for Rancho is Alternative A, the "No Action" alternative, with the addition of two off-leash dog walking areas, one near Montara and the other near El Granada (See Attachment 2). Dogs would be allowed on-leash throughout the remainder of Rancho as indicated in Alternative A in the SETS (See Attachment 3). There is a fundamental error in the status quo assumed for GGNRA's No Action alternative in the SEIS. As acknowledged on page 60 of the SETS, there has been a long history of off-leash dog walking at Rancho, although not officially sanctioned. As such, off-leash dog walking should be the status quo or baseline for GGNRA's No Action alternative, not on-leash dog walking

Response: The no-action alternative is defined in NEPA guidelines as no change from current management and current

conditions (Council on Environmental Quality (CEQ) 1981, Question 3). The No Action alternative in the draft plan/SEIS, representing the existing condition under NPS management, is 36 CFR Section 2.15, under which dogs are permitted on leash throughout Rancho. However, the analysis of cumulative impacts addresses the historic (although illegal under San Mateo County regulations) off-leash use prior to acquisition by the park, and consequently concludes that there would be long-term moderate to major cumulative adverse impacts to dog walkers.

AL1000 - Suggest New Alternative Elements

CONCERN STATEMENT: (Concern ID: 53156) Many commenters feel that the lands of Golden Gate National Recreation Area are not being managed properly under the National Park Service. For this reason, commenters feel that the lands should be managed under a different agency or be given back to the city of San Francisco.

Representative Quote(s):

Corr. ID: 2254 **Organization:** *Not Specified* **Comment ID:** 357236 **Organization Type:** Unaffiliated Individual

Representative Quote: If the GGNRA does not want to manage these properties as a Recreation Area, then they should transfer the Recreation Area to another entity better able to manage it, e.g. the Forest Service or Bureau of Land Management. Alternatively, for sites heavily utilized by dogs and their guardians, such as Ocean Beach and Fort Funston, these properties should be reverted back to San Francisco.

Corr. ID: 6710 **Organization:** *Not Specified* **Comment ID:** 369494 **Organization Type:** Unaffiliated Individual

Representative Quote: There is a third option which might very well be appropriate in this situation. Considering the GGNRA's long, jaded history of ignoring their enabling legislation, violating numerous laws, rules and regulations and unilaterally implementing their own self-styled, self-serving management policies, perhaps its time to turn the GGNRA over to someone better suited to manage this recreational area. We would like Congress to consider the transfer of GGNRA properties to another Federal agency, e.g., the Forest Service or Bureau of Land Management, where recreation is not a bad/foreign word and the sound principles of land use and planning are a major component of their routine management policies.

Response: There are no current or foreseeable land exchange proposals and thus the analysis of possible future land exchanges is outside the scope of analysis for the plan/EIS. The leasing of lands to a different agency or to the City and County of San Francisco would not accomplish the objectives sought by the commenters because the National Park Service Organic Act and NPS resource protection policies would still apply to leased lands.

CONCERN STATEMENT: (Concern ID: 53157) Commenters argue that rather than enforce stricter rules, the National Park Service should educate people on several aspects, including dog waste management, the proper use of public space with pets, interaction with wildlife, and wildlife habitat. Commenters feel that a collaborative effort would protect park resources and visitors.

Representative Quote(s):

Corr. ID: 1868 **Organization:** *Not Specified* **Comment ID:** 354401 **Organization Type:** Unaffiliated Individual

Representative Quote: I and others are supportive of strengthening protections afforded to natural resources, wildlife and habitats within Park boundaries and believe that should be prioritized. I think it would be helpful for the Park Service to expand its public awareness and education efforts to inform dog owners of the on-leash and no harassment policies in the Protected Area at Ocean Beach and other similar designated protective areas on Park lands. Critically, this needs to be followed up with strict enforcement for it to have meaningful impact.

Corr. ID: 1991 **Organization:** *Not Specified* **Comment ID:** 354659 **Organization Type:** Unaffiliated Individual

Representative Quote: The NPS needs to stop thinking that exclusion and enforcement are the way to protect parklands. Instead, NPS should support dogs in national parks and engage and educate the dog owner community to become volunteer monitors and managers of the parks to protect nature and other visitors alike. Such collaboration will prove long-term to be the least costly and conflictive approach.

Corr. ID: 2265 **Organization:** *Not Specified* **Comment ID:** 357271 **Organization Type:** Unaffiliated Individual

Representative Quote: Park impacts, I believe, would be far better served by Leave No Trace education and activities. Please reject any more misguided efforts to reduce negative impacts on our beautiful parks by blaming dogs and dog owners.

Corr. ID: 2840 **Organization:** *Not Specified* **Comment ID:** 353286 **Organization Type:** Unaffiliated Individual

Representative Quote: I would encourage you to provide education and community outreach if there are activities and behaviors that you would like to see different.

Corr. ID: 5098 **Organization:** *Not Specified* **Comment ID:** 362175 **Organization Type:** Unaffiliated Individual

Representative Quote: Rather than placing more constraints on accessibility, the strategy should be to educate and inform owners about the impact dogs left unattended or uncontrolled may have on the wildlife and the native growth. I would favor such methods as having owners of dogs attend an awareness of wildlife and native habitat class that would inform them about the detrimental effects that GGNRA is experiencing and how people can modify their habits to curtail these. Perhaps this class could be a requisite of getting a dog license; or it could be part of a trails access card that owners could carry to certify that they are aware of the impact their use of GGNRA is having.

Response: The need for the dog management plan is discussed in chapter 1 of the final plan/EIS. Currently dog recreation has resulted in controversy, litigation, and compromised safety and visitor experience. NPS plans for outreach and education are discussed in chapter 2 of the final plan/EIS.

CONCERN STATEMENT: (Concern ID: 53158) Commenters feel that there should be a better way to report incidents, report wildlife emergencies, and file a complaint about park staff. Several commenters suggested creating a mobile application that would allow citizens to report incidents directly to law enforcement. Overall, commenters request a simple system for reporting violations. Once an incident or complaint is filed, commenters believe that there should be an easy way, such as an online database, for the public to follow up on the report. One commenter suggested that signs should be posted to advise the public on how to handle beached mammals.

Representative Quote(s):

Corr. ID: 80 **Organization:** Libertarian Party of San Francisco **Comment ID:** 339913 **Organization Type:**

Unaffiliated Individual

Representative Quote: GGNRA rules should also provide penalties for overzealous enforcement by park rangers or other government employees who may be tempted to engage in petty power trips when dealing with members of the public. These penalties should be *heavier* than any imposed on dog owners for violations of the rules, since government employees are entrusted by the public with special authorities and responsibilities and therefore must be held to higher standards.

When someone files a complaint regarding a particular employee, there should be an investigation into the behavior described in the complaint, and the person who filed the complaint should be informed as to how that investigation was conducted, what penalties were imposed or corrective actions taken if any, and how to further appeal the issue if desired.

Too many individuals in positions of authority think that wearing a uniform or having a shiny badge gives them carte blanche to order people around, take on an arrogant attitude, or refuse to answer legitimate questions. Public servants should act like public *servants*, and if they are unable to do their jobs with an appropriately humble and service-oriented attitude, then they should be sent to remedial sensitivity training or removed from their positions.

Complaint procedures should also be clear, simple, and transparent to media and members of the public. Complaint forms should be available on-site, and should also be public. No one should have to rely on simply taking the word of a government employee when asking questions such as what opinions have been voiced by members of the public with regard to a specific policy <redacted> they should be given free access to view, copy, listen to, etc., the original documents, emails, voicemail messages, etc.

Corr. ID: 627 **Organization:** *Not Specified* **Comment ID:** 352766 **Organization Type:** Unaffiliated Individual

Representative Quote: It might be helpful if there was an 'app' (or other easily-accessible method) for reporting dog-wildlife or dog-visitor conflicts (or any kind of problems visitors might want to report). My sense is that the NPS knows of only a small fraction of these incidents, and if these data could be collected in a way that provided wider access to their frequency, locations, and seriousness might provide additional support for efforts to manage dogs. It might also provide a better sense of how many people are unhappy about and willing to report these incidents, and thus how many people would support dog management efforts.

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 366099 **Organization Type:**

Unaffiliated Individual

Representative Quote: At a minimum, the National Park Service should implement an online database for reported incidents that area searchable by members of the public. This could include digital copies of Criminal Incident Reports

(with personal information redacted). The American Veterinary Medical Association Task Force concluded:

Accurate and complete reporting of dog bites is an essential element of a bite prevention program. These reports are vital not only for case management and judicial review but for planning, implementing, and evaluating the status of the problem.

A requirement that all dogs within the GGNRA be licensed will greatly help with incident reporting and tracking.

Corr. ID: 6688 **Organization:** *Not Specified* **Comment ID:** 369331 **Organization Type:** Unaffiliated Individual
Representative Quote: In this DEIS/SEIS the GGNRA mentions their concern for wildlife including marine mammals, especially when they beach themselves to rest or when they are injured and on the beach. The GGNRA seems to be able to count the number of reports of beached mammals they receive, however what they fail to mention is that they have no protocol for the visitor to the GGNRA to follow should they come across a marine mammal on the beach. We personally have made numerous requests to GGNRA management for signs to be placed at the beach which would instruct visitors not to approach the beached mammal and where to call to request assistance for the animal. Many visitors to the GGNRA are not local, some have never been to a beach before, and they require instruction so that they can assist the animal effectively. Oddly enough, the GGNRA has managed to post signs up and down the beach to advise us of recreational restrictions regarding fires, camping and the plover, but they cannot post educational signs to benefit marine mammals.

Response: Enforcement policies for the final plan/EIS are described in chapter 2. Several suggestions provided by commenters for reporting incidents would not be feasible, as outlined in the Alternative Elements Eliminated from Further Consideration section of chapter 2 of the final plan/EIS. However, the park will be seeking ways to make reporting incidents less cumbersome for the public as part of its implementation planning.

CONCERN STATEMENT: (Concern ID: 53159) Many commenters suggest that the NPS should strictly enforce rules for dog walking within the park. Some commenters would like to see enforcement of the current rules prior to imposing new restrictions; other commenters state that the new rules should be strictly enforced from the beginning. All commenters agree that violations should be cited and fined, and repeat offenders should be banned from the park. These violations include not following leash regulations, not controlling aggressive dogs, not picking up dog waste, harassing wildlife, and littering. Commenters would like to see regular patrols by law enforcement that would result in citations for unlawful activities.

Representative Quote(s):

Corr. ID: 3834 **Organization:** *Not Specified* **Comment ID:** 359953 **Organization Type:** Unaffiliated Individual
Representative Quote: Enforcement Policy

The policies must be vigorously enforced; otherwise this initiative is doomed to fail. Must make it clear how enforced. The only way to effectively enforce issued citations is to have the rules state that by using the park, dog owners accept the rules and responsibilities, and enforcement procedures. Appropriate staff must be provided and tasked to enforce these rules at all times. Either existing staff or new dedicated staff needs to be hired to patrol and enforce these areas. Enforcement fines should be easily enough to cover the associated personnel expenses.

Corr. ID: 4140 **Organization:** Richardson Bay Maritime Association **Comment ID:** 362073 **Organization Type:** Unaffiliated Individual

Representative Quote: Currently my favorite walk is a off leash Oakwood fire road and trail. Now I will be banned from walking the trail and must walk up and back on the road leashed. Just like your bike use plan you can not go anywhere easily and make connections. Just in and out.

Instead of this plan which man power must enforce thus wasting time giving nice thoughtful dog owners a ticket. Enforce current laws about poop and dogs running. Give hefty citations to those offenders who are really abusive. Educate others, be helpful and stop acting like the police and everyone is criminal. If your budget is short and can't fund the manpower to control bad dog owners and park visitors, re-prioritize. Stop the fancy infrastructure developments and increase workforce to effectively protect the park and good visitors from those doing their bad deeds.

Corr. ID: 4688 **Organization:** *Not Specified* **Comment ID:** 361334 **Organization Type:** Unaffiliated Individual
Representative Quote: Of course, they should be kept away from wildlife. In cases where dogs do bother people or wildlife, I am in favor of evicting them, giving their owners citations, and permanently banning those particular dogs. I am also in favor of banning dangerous dogs, such as pit bulls and rottweilers.

Corr. ID: 6639 **Organization:** *Not Specified* **Comment ID:** 368120 **Organization Type:** Unaffiliated Individual
Representative Quote: Enforcement: All established Dog Management Rules must be strictly and uniformly enforced at all times ' no more exceptions, no more "education," no more "warnings," no more excuses. Signage must reflect with words, maps, and other illustrations the consequences of non-compliance. Fines for violations of "POSTED RULES" holds more monetary weight than a fine for a dog "unleashed;" enforcement officers must opt for the highest possible monetary fine in order to solidify the overwhelming need to compel dog owners that the public demands their compliance versus continuing to all their perceived entitlement of being an exception to the Laws and certainty that officers will continue to not hold them accountable.

Response: While there will be an initial period of outreach and education, once the rules become effective, they will be enforced. The NPS will hire additional law enforcement officers to help ensure compliance with the rule.

CONCERN STATEMENT: (Concern ID: 53160) Several commenters feel that the role of Golden Gate National Recreation Area is not to support dog ownership, but protect the natural resources. Some commenters feel that the only way to adequately control dog behavior at Golden Gate National Recreation Area in regards to wildlife, habitat and other visitors is to ban dogs completely. Other commenters stated that the park should follow the standards set forth by the National Park Service that require dogs to be on leash if allowed on park property. Other commenters stated that voice control should not be considered as an option for use in any area of the GGNRA that is open to multiple visitor uses. Certain breeds should be banned from the park completely.

Representative Quote(s):

Corr. ID: 120 **Organization:** *Not Specified* **Comment ID:** 345840 **Organization Type:** Unaffiliated Individual
Representative Quote: Due to the difficulty of having park rangers be in all places at all times, the ultimate solution is to ban dogs from the park all together.

Corr. ID: 498 **Organization:** *Not Specified* **Comment ID:** 351803 **Organization Type:** Unaffiliated Individual
Representative Quote: Restricting dogs completely in areas of sensitive wildlife habitat should take precedence. The only way to do this is to not allow dogs completely.

Corr. ID: 707 **Organization:** *Not Specified* **Comment ID:** 352993 **Organization Type:** Unaffiliated Individual
Representative Quote: In addition, I would like to see pitbulls banned from the park. Pitbulls are aggressive dogs and should generally not be allowed in the park because of their tendencies to attack other people and dogs.

Corr. ID: 4932 **Organization:** *Not Specified* **Comment ID:** 361791 **Organization Type:** Unaffiliated Individual
Representative Quote: As such, the Plan must adhere to all established NPS management policies and practices elsewhere in the Park system, and include strong protection for park resources, especially the protection of habitat for birds and endangered species.

Corr. ID: 6034 **Organization:** *Not Specified* **Comment ID:** 365009 **Organization Type:** Unaffiliated Individual
Representative Quote: GGNRA governing officials and scientist must take ever precautionary step to protect the GGNRA's resources. If this means either having no dogs in area(s) at all, or having dogs only in specifically designated areas, then the GGNRA should have full authority to issue such a regulations and be given the power to fully enforce them.

Response: The objectives of the dog management plan are described in chapter 1 of the final plan/EIS. These include both resource protection and providing for a variety of quality visitor experiences, including dog walking. Banning all dogs from GGNRA would not meet the objectives. The final plan/EIS considers and analyzes managing dogs under 36 CFR 2.15 (on-leash only), the national park service regulation for pets. GGNRA cannot ban specific breeds from the park; however, uncontrolled and aggressive dogs will not be allowed. This is further described in chapter 2, Elements Common to Action Alternatives.

CONCERN STATEMENT: (Concern ID: 53161) Commenters suggest that signage and natural barriers could eliminate many issues among different user groups at the park. Signage should be clear and located at entrances to the park, as well as transition points (e.g., between on- and off-leash areas and between the park and city property). One commenter also suggested distributing maps around the city to explain the limitations on dog walking in the park. Several commenters suggested that planting shrub-type vegetation as a natural barrier around sensitive areas would help to clearly delineate those

areas to dog walkers. Commenters believe that the signage will help visitors understand the dominant use of an area they are about to enter. Additionally, one commenter suggested the use of signs to warn users of the dangers of wildlife in the area.

Representative Quote(s):

Corr. ID: 342 **Organization:** *Not Specified* **Comment ID:** 350629 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe the new plan will work if maps are broadly distributed city and county wide as well as posted prominently at the start of each trail. It is with this in mind that I suggest a broad and continuous PR campaign on the part of the NPS and the GGNRA so we can all enjoy the beautiful surroundings safely.

Corr. ID: 561 **Organization:** *Not Specified* **Comment ID:** 352641 **Organization Type:** Unaffiliated Individual

Representative Quote: I would suggest that signs be posted warning owners of small dogs that they should be cautious during dawn and dusk walks (even with dogs on leash), particularly at Muscle Rock where attacks of coyotes are not uncommon even on large dogs during the early morning.

Corr. ID: 1179 **Organization:** *Not Specified* **Comment ID:** 351921 **Organization Type:** Unaffiliated Individual

Representative Quote: We need clear well placed signage to make the preferred alternative work. Wherever parking is available there must be signs. Signs at the lagoon bridge would be effective. At the many paths which access the Central Beach we need signage indicating this area is reserved for off-leash dogs. The signage plan should be coordinated with CFDG and offered to the public for review

Corr. ID: 1515 **Organization:** *Not Specified* **Comment ID:** 352969 **Organization Type:** Unaffiliated Individual

Representative Quote: A simple sign at the entrance of Fort Funston that says "This park is for people who love dogs. If you don't love dogs, you will not enjoy this park." The idea you would try to create a space where every type of person is happy is an infantile and inane goal. People want to congregate in communities with shared expectations. Fort Funston is for dogs to run free.

Corr. ID: 3834 **Organization:** *Not Specified* **Comment ID:** 359951 **Organization Type:** Unaffiliated Individual

Representative Quote: Sufficient Signage

The park must provide effective signage to give notice to rules, policies, responsibilities, enforcement and rights. Adequate signage guiding the owners to pet friendly grass areas and beaches is needed to support the policy and rules. This should include a master signage with site map, marked areas, and listing simple rules to follow to make enforcement feasible. Visual signs along path of travel clearly marking permitted areas and off limit areas through symbols and location maps. Clear location markings and allowed pet areas must be provided. Maybe even a large map with vehicle stop area to read before entering parking area. Provide clear directions for vehicles with pets and when walking animals. Make it easy for the pet owners and walkers to comply with the rules. Make it easy for the staff to enforce the rules.

Corr. ID: 6645 **Organization:** Pacifica City Council **Comment ID:** 368195 **Organization Type:** Unaffiliated Individual

Representative Quote: Clear Signage at Enforcement Transition Zones:

We would like to reiterate this comment that was previously made about signage. 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 Mon Point land. Therefore we encourage GGNRA to clearly post these transition zones.

Response: The park is committed to a period of outreach and education prior to implementation of the new rule. This will include many of the ideas that are identified here such as planning charrettes for input about landscape design solutions including vegetative barriers, types and locations of signage, etc. The use of signage is discussed in chapter 2 of the final plan/EIS for the alternatives. Fencing and natural vegetative barriers are also discussed in chapter 2.

CONCERN STATEMENT: (Concern ID: 53162) The NPS should engage the user communities to help maintain the park and to help guide decisions. Park visitors are willing to volunteer for such activities as beach clean ups and native plant restoration. The NPS should create a forum with representatives from each user group to determine the best way to resolve

issues. The NPS should assign a new leadership team to work with the user groups to create a management plan that will please the majority of visitors.

Representative Quote(s):

Corr. ID: 1321 **Organization:** *Not Specified* **Comment ID:** 352306 **Organization Type:** Unaffiliated Individual

Representative Quote: Finally, again at the in-person meetings in Mill Valley some years ago, I proposed that you take advantage of the insights of people using these trails every day, most of whom are accompanied by dogs. We see the uses and abuses humans impose on our trails and parks. I've personally cleaned up after humans almost daily including those camping illegally in these places. Consider making us "trail guardians" who can give you more useful information about what's going on in Bay Area parks; you could establish a site wherein we could register any useful observations.

Corr. ID: 1736 **Organization:** Northern California Shiba Rescue **Comment ID:** 353716 **Organization Type:** Unaffiliated Individual

Representative Quote: Further, I support the forming of a volunteer taskforce, complete with docents, and guides, to help support the GGNRA, specifically for the training, education and support of Dogs and their owners while enjoying the GGNRA.

Corr. ID: 2686 **Organization:** *Not Specified* **Comment ID:** 357068 **Organization Type:** Unaffiliated Individual

Representative Quote: A proper forum should be set up to review recreation management and should include dog walkers and other park users such as cyclists, equestrians, hikers, and surfers and sail boarders. This type of committee would be valuable for the GGNRA in order to hear directly from their users and to engender their support in maintaining the GGNRA lands through volunteer opportunities supporting collective access.

Corr. ID: 4715 **Organization:** *Not Specified* **Comment ID:** 361379 **Organization Type:** Unaffiliated Individual

Representative Quote: I am in favor of a balanced approach as described in alternatives E and F. However, I believe the NPS stands to allow for more community involvement with the release of this plan. Specifically, setting up voluntary activities for visitors to participate in the restoration and continued maintenance of the parks. For example, beach clean up days, native plant restoration, trail improvements, etc. For the many dog owners who love their pets and love their parks, there should be more opportunities for engagement and education.

Corr. ID: 4784 **Organization:** *Not Specified* **Comment ID:** 361521 **Organization Type:** Unaffiliated Individual

Representative Quote: I expect the public to additionally be able to monitor and report dog issues, and suggest that appropriate signage, outreach and internal procedures will be in place to empower those most affected most by dog issues, so that the dog community will know that it is not just the park staff and police monitoring their behavior.

Corr. ID: 5923 **Organization:** *Not Specified* **Comment ID:** 364645 **Organization Type:** Unaffiliated Individual

Representative Quote: it would seem that no stakeholder group has evolved trust in the ggnra leadership during the prolonged planning process.

i respectfully suggest that a new leadership team be assigned to this project. that team needs to confer with local leaders, who are the experts in evolving successful collaboration between stakeholders, to learn what processes can be successfully applied to the planning process for our beautiful national recreation area. i would suggest that both phil ginsberg, director of sf recreation and park dep't, and mohammed nuru, director of sf dep't of public works, may provide invaluable insights to, &/or training for, the ggnra leadership team.

Response: NPS intends to engage stakeholders and the broader public in its facility implementation plans and in understanding its monitoring management program. NPS will also encourage volunteer stewardship and trail patrol groups to assist NPS in informing park users on ways to clean, care for and restore park lands open to dog walking. NPS will also seek to establish cooperative networks to augment NPS stewardship capabilities. Due to restrictions in the Federal Advisory Committee Act, the NPS would likely not seek to establish a forum of designated stakeholder representatives but would instead seek ways to engage both key stakeholders and the broader public in providing input on future implementation issues.

CONCERN STATEMENT: (Concern ID: 53163) Golden Gate National Recreation Area has traditionally been used for dog walking. As the GGNRA is not a national park, commenters feel that the management plan has misrepresented the enabling legislation and mission, stating that it was established to maximize recreation opportunities for residents of the City of San Francisco and visitors. The NPS should formalize the 1979 Pet Policy at this time and any lands added to Golden Gate National Recreation Area in the future should have their historic off-leash areas retained, including lands in San Mateo. If

changes are needed in the future, they should be implemented gradually. Commenters also stated that in addition to the historic off-leash areas, NPS should expand off-leash dog walking in San Mateo areas and new lands as they are added to the park.

Representative Quote(s):

Corr. ID: 834 **Organization:** *Not Specified* **Comment ID:** 353393 **Organization Type:** Unaffiliated Individual

Representative Quote: The GGNRA should instead codify the original 1979 Pet Policy as a Section Seven Special Regulation, which it has the authority and responsibility to do. All properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area, which GGNRA management has held in disregard for quite some time.

Corr. ID: 1424 **Organization:** *Not Specified* **Comment ID:** 352530 **Organization Type:** Unaffiliated Individual

Representative Quote: These trails and beaches have been set aside for dog walking since the original pet policy in 1979. That policy needs to be formalized and supported with off-leash areas in San Mateo County and on new lands that the GGNRA acquires in the future.

Corr. ID: 2016 **Organization:** *Not Specified* **Comment ID:** 354688 **Organization Type:** Unaffiliated Individual

Representative Quote: The GGNRA has lost sight of its purpose: it was set up to be a RECREATION AREA for a densely populated, urban area. These trails and beaches have been set aside for dog walking since the original pet policy in 1979. That policy needs to be formalized and supported with off-leash areas in San Mateo County and on new lands that the GGNRA acquires in the future.

Corr. ID: 2736 **Organization:** *Not Specified* **Comment ID:** 357152 **Organization Type:** Unaffiliated Individual

Representative Quote: In looking at the POLICY ON THE ESTABLISHMENT AND ADMINISTRATION OF (NATIONAL) RECREATION AREAS, the #1 point is to provide investment in outdoor recreation that is more clearly responsive to RECREATION DEMAND than other investments that are based primarily upon considerations of preserving unique natural or historical resources, the need to develop and conserve public lands and forests, or the requirements of major water resource development undertakings.

The recreation demand for local citizens comes from dog owners - over 50% of San Francisco residents have dogs. While you reference point #3 in your study, there is not mention on point #1. Please consider this motivation of the establishment of Recreation Areas in your analysis.

Corr. ID: 4871 **Organization:** *Not Specified* **Comment ID:** 361654 **Organization Type:** Unaffiliated Individual

Representative Quote: I oppose the Preferred Alternative because it is too restrictive. I support formalization of the 1979 Pet Policy PLUS off-leash access in San Mateo County and on new lands that the GGNRA acquires in the future.

Corr. ID: 6257 **Organization:** *Not Specified* **Comment ID:** 366219 **Organization Type:** Unaffiliated Individual

Representative Quote: The 1979 Pet Policy should be kept in place until specific and persuasive evidence is found to indicate a change is needed. And if that does happen change should be implemented gradually.

Response: The draft plan/SEIS includes a reasonable range of alternatives allowing a diverse range of visitor experiences while still protecting resources at the park. NPS Management Policies, which apply to all units of the NPS, provide that the fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. This mandate is independent of the separate prohibition on impairment and applies all the time with respect to all park resources and values, even when there is no risk that any park resources or values may be impaired. NPS managers must always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values. Congress has directed that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant. (NPS Management Policies § 1.4.3, 54 USC 100101(a), 100301 et seq.). GGNRA's enabling legislation reflects this dual mission - to "preserve public use and enjoyment" and "provide for the maintenance of needed recreational open space" while at the same time managing it "consistent with sound principles of land use planning" and "preserv[ing] the recreation area, as far as possible, in its natural setting...". GGNRA is not eliminating dog walking, rather, it seeks to manage its use in order to be consistent with both its enabling legislation and the NPS Organic

The alternatives evaluated a range of opportunities for dog walking. Alternative E would provide the greatest level of access for dog walkers throughout GGNRA. Alternative E reflects those portions of the 1979 Pet Policy that can meet the purpose

and need of the plan. Because all elements of the 1979 Pet Policy (as described in Alternative A) do not meet the purpose, need, and objectives of the plan, this alternative is more restrictive than the 1979 Policy. The NPS has found that the preferred alternative/final plan best meets the objectives.

NPS considered but eliminated from further consideration several areas for voice and sight control, but has added a 3 acre bowl in a former quarry that is a disturbed area called Flat Top in southwestern Rancho as a voice and sight control area in the final plan/EIS. The NPS southeastern corner of Sharp Park Beach could also be considered for such a change by NPS if the adjacent major public agency landholders of the public beach areas (CCSF, Pacifica, State of California) decide on changing use management of those adjacent areas. Please see chapter 2 for additional details on changes to alternatives.

CONCERN STATEMENT: (Concern ID: 53164) The NPS should not spend money creating and enforcing a new dog regulation at Golden Gate National Recreation Area. Instead, the money should be focused on upgrading facilities, education, and enhancing recreational activities. Fundraisers with the private sector should be started to fund items such as waste bags, fencing, and water fountains for continued use of the park by dog owners. The NPS could increase revenue by allowing coffee and food trucks in popular areas.

Representative Quote(s):

Corr. ID: 470 Organization: *Not Specified* **Comment ID: 351752 Organization Type:** Unaffiliated Individual

Representative Quote: Instead,.....input/funds from the private sector specifically to support park-dog co-habitation would promote more good will in the community while providing for conservation efforts. I would suggest a fund-raising campaign (such as your initial Chrissy Field restoration campaign) to fund dog use preservation efforts - like the installation of dog fountains, dog-only fenced areas, doggie bags disposal staff.

Corr. ID: 575 Organization: *Not Specified* **Comment ID: 352660 Organization Type:** Unaffiliated Individual

Representative Quote: I urge you to consider leaving the current dog access in place as is. The amount of money required to enforce additional dog bans should instead be spent on upgrading the antiquated facilities at the beaches.

Corr. ID: 2288 Organization: *Not Specified* **Comment ID: 357621 Organization Type:** Unaffiliated Individual

Representative Quote: You could make the dog walking areas places to increase the income of the GGNRA by encouraging the enjoyment of those areas. Just placing coffee and food trucks in those areas would bring in needed income. Figure out ways to make them better not restrict their use.

Corr. ID: 5224 Organization: *Not Specified* **Comment ID: 362697 Organization Type:** Unaffiliated Individual

Representative Quote: I believe the GGNRA rep stated that it will cost two million a year to enforce the Preferred Alternative. If there is money, why not use it to do study or to design strategies that won't turn away thousands of people from supporting the NPS? The GGNRA might use some money to administer a program to educate dog walkers about responsible off-leash recreation. Additionally, the money could be used to enforce the current laws about littering, lack of voice control, etc.

Corr. ID: 6107 Organization: *Not Specified* **Comment ID: 365421 Organization Type:** Unaffiliated Individual

Representative Quote: I have recently learned that it could cost 2.5 million dollars per year to enforce the proposed ban on off leash dog walking in some of San Francisco's most favorite areas for dog lovers (and this represents more than 40% of the population of SF Bay area). That money should be used to enhance this recreational activity (if spent at all), not to ban it.

Response: Please see chapter 1 of the final plan/EIS for the purpose, need, and objectives of the dog management plan, which describes the need for a dog management regulation. The park will continue to seek funding for facility improvements, education, enforcement, and associated staffing for implementation of the dog management plan. Both volunteer stewardship and trail patrols will be encouraged to augment NPS staffing and operational capability to care for these dog walking areas. Donations are always accepted for such stewardship support; and, revenue-generating ideas are welcome.

CONCERN STATEMENT: (Concern ID: 53165) The NPS should look to other agencies for examples of how a variety of user groups can use the same area with fewer conflicts. For example, Pulgas Ridge Open Space Preserve contains no dog areas, on leash areas, and off leash areas and Rattlesnake National Recreation Area and Wilderness produces an annual monitoring report which is used to alter management of recreational areas.

Representative Quote(s):

Corr. ID: 2623 Organization: *Not Specified* **Comment ID: 356918 Organization Type:** Unaffiliated Individual

Representative Quote: Look at Pulgas Ridge Open Space Preserve. It contains the only off leash hiking trail system within San Mateo County. Within the space there are no dog areas, on leash areas, and off leash areas. The compliance is high and conflict is low, everyone has a place to go. However it is quite a drive for the coastal communities and is generally only used by people local to that area. We need more local areas like this.

Corr. ID: 6685 **Organization:** *Not Specified* **Comment ID:** 369015 **Organization Type:** Unaffiliated Individual

Representative Quote: The enabling legislation requires the GGNRA to utilize sound principles of land use planning and management. Accepted practice would be illustrated by the Rattlesnake National Recreation Area and Wilderness (RNRAW) which produces an annual monitoring report. The report assesses current recreation trends, needs, and impacts, and thereby serves as a tool for long-term management of the RNRW.

Response: NPS staff obtained dog management policies, information on visitor experience/conflict information, enforcement success, and other applicable information from a variety of state, regional, county, and city park and recreation agencies. chapter 1, Summary of Background Conditions and Review of Literature, of the final plan/EIS presents NPS' findings. One example similar to Pulgas Ridge Open Space Preserve that has been adopted in San Mateo county in the southwestern part of Rancho where dog walkers are allowed on-leash to a contained off-leash area; this will be established within the Flat Top former quarry site on NPS lands. The purpose of the NPS monitoring program is specifically to address compliance with the new regulation; and alter management actions if necessary.

CONCERN STATEMENT: (Concern ID: 53166) A Leave No Trace approach should be upheld at Golden Gate National Recreation Area, requiring all dog owners and walkers to carry their dogs' waste out of the park. Additional trash cans should be installed in heavy use areas. The NPS should also try alternative methods of waste management, such as compost stations and biodegradable bags.

Representative Quote(s):

Corr. ID: 3834 **Organization:** *Not Specified* **Comment ID:** 359952 **Organization Type:** Unaffiliated Individual

Representative Quote: Make Waste Disposal Convenient For Pet Owners

Modify the existing placement layout of trash cans so that there are at least three beach side trash cans for easy disposal of waste bags by owners while the pet is still able to be off leash and under owner control. This should aid buy in by the group for properly disposing the waste bags while being able to enjoy the animal walk uninterrupted. This eliminates any excuses for owners or walkers temporarily placing dog waste bags down and leaving them to pollute the environment.

Corr. ID: 4816 **Organization:** *Not Specified* **Comment ID:** 361586 **Organization Type:** Unaffiliated Individual

Representative Quote: Consider experimenting with a green approach to dog waste, providing compost stations like those coming into use in Canada, or biodegradable bags which could then be composted instead of going to land-fills.

Corr. ID: 5181 **Organization:** *Not Specified* **Comment ID:** 362504 **Organization Type:** Unaffiliated Individual

Representative Quote: Dog waste is not environmentally friendly and can be classified as a health hazard even if it deposited in trash cans it still must be handled and removed safely from the area placing the additional burden of cost to the tax payer who might have a different opinion of dogs or animals; think and practice leave no trace in our natural public lands. Dog and animal owners should remove and pack out all waste on their own to include supplying and removing dog fecal matter disposal bags.

Response: Dog walkers must pick up their dogs' feces immediately and keep these bags until they can dispose of them in a garbage container. The number and location of garbage containers at each site will be determined based on visitor use and operational efficiency. While a 'Leave No Trace' principle is generally encouraged in the Golden Gate National Recreation Area, dog walkers will be encouraged to carry their dogs' waste either out of the park or to the trail head parking area. At some sites in the GGNRA, dog walking groups have also provided dog waste bags, though this is the responsibility of each dog walker to bring with them. GGNRA will be encouraging area users and stewardship groups in its implementation planning to identify alternative solutions that do not simply rely on increased maintenance operations to be effective.

CONCERN STATEMENT: (Concern ID: 53167) There are many opinions regarding the use of leashes:

- In on-leash areas, a person must be in control of the leash, instead of allowing the leash to drag behind the dog.
- Dogs on leash throughout the park
- Dogs on leash in all areas where dogs are currently allowed
- Dogs on leash in limited areas
- Dogs on leash on trails

- Dogs leashed around horses, children, bicyclists, hang gliders, etc.
- Dogs on 6' fixed leash
- Dogs on leash greater than 6 feet
- Elderly/disabled allowed to use retractable leashes greater than 6 feet
- Certain breeds leashed at all times
- All fire roads open to leashed dogs
- Allow a Carry Leash policy - people who object to a dog's behavior can ask the owner to put the dog on leash

Representative Quote(s):

Corr. ID: 213 **Organization:** *Not Specified* **Comment ID:** 350124 **Organization Type:** Unaffiliated Individual

Representative Quote: Please also include that they must not drag leashes.

Corr. ID: 744 **Organization:** *Not Specified* **Comment ID:** 353090 **Organization Type:** Unaffiliated Individual

Representative Quote: I think that dogs should be on leash (fixed 6 foot, one dog per person) in all areas of Golden Gate National Recreation Area (GGNRA), except in areas where all dogs are prohibited. The leash law should be consistent with all National Parks, such as Kings Canyon/Sequoia, and Yosemite National Parks.

Corr. ID: 782 **Organization:** *Not Specified* **Comment ID:** 353279 **Organization Type:** Unaffiliated Individual

Representative Quote: I urge you to require on-leash control in high use areas, sensitive wildlife areas (e.g., Ocean Beach Snowy Plover area, Crissy Lagoon, Sutro Baths), and beaches where kids and the public play and walk in the sand.

Corr. ID: 825 **Organization:** *Not Specified* **Comment ID:** 351407 **Organization Type:** Unaffiliated Individual

Representative Quote: In addition, on some open space trails (not GGNRA), there is a CARRY LEASH policy. If people carry leashes for their dogs, people who object to a dog's behavior can ask the owner to put the dog on leash.

Corr. ID: 1135 **Organization:** *Not Specified* **Comment ID:** 351692 **Organization Type:** Unaffiliated Individual

Representative Quote: I strenuously oppose the ban on dogs in areas where they were previously permitted. At minimum they should be leashed in those areas on leash. Off leash access should be kept to a maximum.

Corr. ID: 1200 **Organization:** *Not Specified* **Comment ID:** 351963 **Organization Type:** Unaffiliated Individual

Representative Quote: I am fine with certain breeds being leash only - I don't really want my kids to run into a off leash pit bulls, but even as much as I hate that particular breed, we are Americans, and we have RIGHTS, to life, liberty and the pursuit of FREEDOM.

Corr. ID: 4652 **Organization:** *Not Specified* **Comment ID:** 361184 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm not advocating that dogs be locked up inside, but I do think that on trails that are frequented by all kinds of people, a dog should be leashed. If I'm at a park or beach and there are designated dog zones, I'll be sure to stay away from those, as long as there are also places that people without dogs can enjoy the beach/park as well.

Corr. ID: 4816 **Organization:** *Not Specified* **Comment ID:** 361595 **Organization Type:** Unaffiliated Individual

Representative Quote: Dog caregivers must leash excitable dogs within 50' (? not sure how far) of horses, hang-gliders, and other stimuli known by the owner to cause prolonged barking or aggression. When sharing paths with young children and bicyclists, owners must leash their dog and/or withdraw a safe distance to reduce other users' anxieties. Owners are expected to act as good-will-toward-dogs-ambassadors, recognizing that many people have a high level of anxiety about dogs.

Corr. ID: 5663 **Organization:** *Not Specified* **Comment ID:** 364092 **Organization Type:** Unaffiliated Individual

Representative Quote: Respectfully, I think dogs should be on leashes in ALL NPS areas. Banning them from some areas within NPS properties would be a good idea, too. Specifically, I think they should be banned from ALL beaches due to potential negative impacts upon Western Snow Plover.

Corr. ID: 6062 **Organization:** *Not Specified* **Comment ID:** 365282 **Organization Type:** Unaffiliated Individual

Representative Quote: The preferred alternative would unfairly discriminate against disabled and senior recreational access by unreasonably enforcing a six foot limit on leash length. For seniors and disabled persons there needs to be

greater flexibility in the tether, such as either voice control or the popular retractable leashes. Having recently suffered a neck injury I have found that even with my well-trained dog I can not comfortably walk with a fixed length shorter leash without experiencing occasional painful and damaging pulls on the leash. Consequently I think that the Park Service should accommodate disabled and senior access by allowing use of retractable leashes greater than six feet in length in some portions of the Recreation Area.

Corr. ID: 6062 **Organization:** *Not Specified* **Comment ID:** 365284 **Organization Type:** Unaffiliated Individual
Representative Quote: For example as to Ocean Beach the Park Service asserts that it needs to separate dogs from birds. However, a short six foot leash is not the least restrictive alternative. A longer leash or retractable leash would still allow some individuals to walk on the beach, as would voice control. Similarly the Park Service could largely achieve the same presumed wildlife protection goals by simply enforcing a ban on any dogs being allowed within 50 or 75 feet of a bird. Alternatively the Park service could in the interim test a program of certifying people with well trained voice control proven dogs for off leash recreation in some areas.

Response: Chapter 2, "Elements Common to Action Alternatives" section describes requirements for leashes. Dog walkers are required to have a six foot leash for every dog under their care attached to the dog and simultaneously held by the dog walker. Chapter 2 also describes which areas on-leash dog walking is permitted. The use of other types of leashes is also discussed in this chapter under the "Alternative Elements Eliminated from Further Consideration" section. Key elements of this include that a 6ft leash is required to ensure dog management and minimize impacts off-trail where on-leash dogs are allowed. Comments regarding areas where dogs must be leashed are discussed in chapter 2 and these comment responses, including dogs on leash on trails and fire roads, separation of types of uses (for example, equestrian-only trails and hang gliding areas don't allow dogs), disabled users and on and off leash, and differentiating between breeds of dogs. Please refer there for additional rationale.

CONCERN STATEMENT: (Concern ID: 53168) Dogs should have seasonal or year-round restrictions in sensitive areas, such as western snowy plover nesting areas or native plant restoration areas. Restrictions in these areas should be strictly enforced. Any fences or other boundaries for sensitive areas should be effective in keeping dogs and people out of the area.

Representative Quote(s):

Corr. ID: 1371 **Organization:** *Not Specified* **Comment ID:** 352409 **Organization Type:** Unaffiliated Individual
Representative Quote: All that said, I would like to propose a couple of things that might improve the situation: off leash areas should have clear signposting so that those who are not comfortable around dogs, or who would just prefer not to be around dogs, can choose to go elsewhere (in the other 99% o the lands); in addition, we dog owners are willing to compromise seasonally when native species of bird or plants need some extra protection from the dogs, and if during those times, signs are posted, we would be willing to have our dogs on leash in those sensitive areas, or under voice command to keep out.

Corr. ID: 2064 **Organization:** *Not Specified* **Comment ID:** 355624 **Organization Type:** Unaffiliated Individual
Representative Quote: There were new posts with wires up to replace the old sand covered ones in the areas that are off limits. It's great that GGNRA are replacing the posts to help restrict access to "protected areas", but it really isn't effective. Many times, you still see people (with AND without dogs) walking through the restricted areas. To be clear, GGNRA should post clear signage at each of the areas where both dogs AND people are not allowed. The new posts and wires do not prevent sand from sliding into the protected areas. If you walk down the paved trail to the very end, you can see numerous spots where the sand has clearly taken over the paved walkway and has covered plants in the "protected areas." This isn't something that the dogs or people have caused. That's mother nature. If the GGNRA is really that concerned about the "protected areas" spend the time and money on effective barriers to protect these areas. There's no point in putting up new posts if they aren't effective. The sand has been overwhelming the path and plants for months now. GGNRA needs to come up with a better idea to protect the plants, which are living areas for other animals.

Corr. ID: 4117 **Organization:** *Not Specified* **Comment ID:** 361459 **Organization Type:** Unaffiliated Individual
Representative Quote: If there is to be any resolution, the Park District needs to do a survey of endangered species, either plant, bird or animal, identify those that need the greatest protection, like Snowy Plovers, establish rules, stick to them and then have a strong enforcement program. It's a waste of time having all these meetings where dog owners rule or environmentalists rule because the real rules needs to be set by the governing agency and enforced.

Response: The final plan/EIS does establish year round closures for sensitive areas, including snowy plover areas at Ocean Beach and Crissy Field, as well as changes in use in other sensitive wildlife or plant areas in the park to better protect resources; and incorporate seasonal closures at Muir Beach and Rodeo Beach for seasonal creek/ocean connectivity to protect fish passage. These restrictions are key protections and will be among the first to be implemented.

CONCERN STATEMENT: (Concern ID: 53169) A permit rule for certain areas such as the Snowy Plover Protection Area (SPPA) could be established to reduce the impacts from dogs in those areas.

Representative Quote(s):

Corr. ID: 204 **Organization:** *Not Specified* **Comment ID:** 350105 **Organization Type:** Unaffiliated Individual

Representative Quote: How about issuing permits for locals to walk their leashed-dogs in areas such as SPPA? This would limit the number of dogs in the area and truly provide some of the balance you claim to be seeking. A "No-dog" policy does not offer any balance.

Response: To reduce impacts to snowy plovers, no dog walking will be allowed within the Snowy Plover Protection Area at Ocean beach; seasonal restrictions have not been effective there.

CONCERN STATEMENT: (Concern ID: 53170) To reduce the number of dogs within GGNRA, the number of dogs allowed per person should be reduced and a high dollar permit fee should be implemented for professional dog walkers.

Representative Quote(s):

Corr. ID: 5941 **Organization:** *Not Specified* **Comment ID:** 364764 **Organization Type:** Unaffiliated Individual

Representative Quote: If there are too many dogs at once then reduce the number of dogs one person can bring. The professional dog walkers are allowing many families/individuals to have dogs even though they are not home to be with them. Make it very expensive for the dog walkers to operate their businesses, at the moment they operate for free. It will reduce the number of professional dog walkers and dog owners and therefore dogs!

Response: The final plan/EIS proposes that dog walkers be limited to three or fewer dogs at most sites, but dog walkers may apply for a permit to walk up to six dogs at certain sites for a fee. This information can be found in chapter 2 in the "Elements Common to All Action Alternatives" section and on the "Summary of Alternative Elements by County, North to South" table. The proposal to allow more than 3, and up to 6, dogs per walker through a permit aligns with dog walking regulations in most, adjacent public land management agencies. Costs for an NPS permit for special park uses are regulated for cost recovery purposes. For more information on permits, please see Appendix F of the draft plan/SEIS.

CONCERN STATEMENT: (Concern ID: 53172) The NPS should make changes on a case-by-case basis or use density to put limits on the allowed level of dog use. When changes are made, the NPS should establish pilot programs to test the effectiveness of changes. After implementing the plan, the NPS should monitor the results and present the results in a report.

Representative Quote(s):

Corr. ID: 224 **Organization:** *Not Specified* **Comment ID:** 350142 **Organization Type:** Unaffiliated Individual

Representative Quote: As a frequent Ocean Beach visitor, my recommendation is to base the dog and off-leash restrictions on visitor density.

Corr. ID: 5631 **Organization:** Marin Conservation League **Comment ID:** 364040 **Organization Type:** Unaffiliated Individual

Representative Quote: Finally, the effectiveness of Alternative F in protecting resources and enhancing safety of visitors and dogs will depend heavily on the combination of responsible observance by dog walkers and enforcement actions taken by GGNRA. Because neither of these can be assured, adoption of this alternative should be conditioned on establishment of a date-certain to allow for review of the Plan's effectiveness based on monitoring of user compliance.

Corr. ID: 6056 **Organization:** *Not Specified* **Comment ID:** 365274 **Organization Type:** Unaffiliated Individual

Representative Quote: I also encourage you to think creatively, and potentially institute pilot programs that try to maximize the benefits of all users while reducing risk to the environment and the visitors and bay area residents as well as our canine companions.

Corr. ID: 6121 **Organization:** *Not Specified* **Comment ID:** 365481 **Organization Type:** Unaffiliated Individual
Representative Quote: Finally, I hope you will consider doing an "impact study" a year or two after you impose whatever new plan you choose - to see whether more or less people are using the area, how satisfied they are, and so on.

Corr. ID: 6186 **Organization:** *Not Specified* **Comment ID:** 365983 **Organization Type:** Unaffiliated Individual
Representative Quote: Differentiate the various GGNRA land parcels by appropriate criteria for each parcel and suggest the most important and urgent steps towards achieving the stated goals on a case by case basis while acknowledging (quantifying current use, problematic issues, and expected benefits of any imposed restrictions vs. any displacement expected) and use this as the basis for your recommendations.

Response: The monitoring management program will in fact adjust and make changes as needed to ensure effectiveness of the dog plan by monitoring the results; when approaching an unacceptable impact, for example, primary or secondary management actions will be taken by the Superintendent to mitigate those impacts. The monitoring program will include testing of indicators, education and outreach on the program and annual reporting.

CONCERN STATEMENT: (Concern ID: 53173) Commenters suggested that fences or natural barriers be used to separate areas for off-leash dogs, especially in areas adjacent to children's parks. This is necessary to protect other visitors and resources.

Representative Quote(s):

Corr. ID: 4693 **Organization:** *Not Specified* **Comment ID:** 361343 **Organization Type:** Unaffiliated Individual
Representative Quote: In addition, off-leash dogs near playgrounds can be dangerous to our small, toddling children and I believe a safe-distance perimeter would be helpful so children can also enjoy the grassy areas and not be in fear of getting knocked over by a dog chasing a ball.

Corr. ID: 6639 **Organization:** *Not Specified* **Comment ID:** 368121 **Organization Type:** Unaffiliated Individual
Representative Quote: Unleashed Dog Areas: All designated areas which allow not-tethered dogs must be well defined with beginning and full-circle endings of impenetrable barriers where dogs cannot escape and where others do not have to deal with most owners' inability to restrain pets.

Unleashed areas must not span public paths-of-travel walkways, driveways or be open to any adjacent areas where not-tethered dogs are not allowed. Owners will claim ignorance, bully any other park user who dares to ask them to tether their pet, and ignore rules anyway if not strictly contained within an area.

Response: Landscape design solutions including fencing and natural barriers where appropriate, will be implemented to separate off-leash dog areas. Fencing and natural vegetative barriers are discussed in chapter 2 of the final plan/EIS for the alternatives. Signage is also discussed in chapter 2.

CONCERN STATEMENT: (Concern ID: 53174) If off-leash areas in the park are eliminated, then off-leash areas should be established by NPS elsewhere.

Representative Quote(s):

Corr. ID: 802 **Organization:** *Not Specified* **Comment ID:** 353312 **Organization Type:** Unaffiliated Individual
Representative Quote: As a dog owner and regular user of Ft. Funston, I implore the National Park Service not to close any off-leash areas in or around San Francisco without simultaneously opening other similar sized areas for dogs to be off leash. It is unrealistic not to provide dog owners with a large space to exercise their dogs off leash in San Francisco. If Ft. Funston were to be closed to off-leash dogs but another area were to be opened, perhaps at Ocean Beach, Golden Gate Park, or the Presidio, I would understand and accept the new regulations. But to close an off-leash area without opening another in its place will put dog owners in an extremely difficult position. I, for one, would likely exercise my dog in areas with leash requirements but lax enforcement, which is not a good solution for anyone.

Response: NPS does not have the authority to establish off-leash dog walking in areas outside its own jurisdiction; however, GGNRA has been working regionally with counties and open space groups, such as in San Mateo county, to consider this.

CONCERN STATEMENT: (Concern ID: 53175) Parking for people with dogs should be provided in key areas so that they can access dog-friendly areas.

Representative Quote(s):

Corr. ID: 3834 **Organization:** *Not Specified* **Comment ID:** 359950 **Organization Type:** Unaffiliated Individual
Representative Quote: Provide Pet Parking

The plan needs to provide a parking area acceptable for dog owners and walkers to park their vehicles which provides

reasonable access to pet acceptable areas and prevents uncontrolled animals from running immediately onto people friendly beaches and grass areas that are off limits to pets.

Response: NPS did consider parking areas when establishing dog walking areas throughout the park. NPS is unable to establish parking areas specifically for any one user group, other than for accessibility purposes, given the administrative and enforcement burden of managing a high demand area for one specific use. It's also not feasible given the various users within GGNRA, of which dog walkers are estimated to represent only 10-12% of all uses.

CONCERN STATEMENT: (Concern ID: 53176) The NPS should not allow commercial dog walking in Golden Gate National Recreation Area

Representative Quote(s):

Corr. ID: 4932 **Organization:** Not Specified **Comment ID:** 361792 **Organization Type:** Unaffiliated Individual

Representative Quote: The plan must not allow commercial dog walking, which is not an appropriate activity for national park lands. Use of the GGNRA by the commercial dog walking industry constitutes an exploitation of park lands strictly for private financial gain. Commercial dog walking provides no service or benefit to other park users, adversely impacts park resources and values, and only serves private enterprise at the expense of the American public.

Corr. ID: 6146 **Organization:** Not Specified **Comment ID:** 365618 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Funston has been inundated with professional dog walkers coming day after day, mornings and afternoons. To have them limited to 6 dogs per person would be great. Keeping track of 10 or 12 unleashed dogs, especially while simultaneously talking on a cell phone is just not possible. If this goes through, please require them to throw away their bagged dog feces in trash cans and not leave them at the top of stairway/sand ladders (because who wants to carry bags of poop down and back up again?) for later (maybe) pick up.

Response: The majority of commercial dog walkers walk more than 3 dogs. The primary mechanism for managing and limiting the number of commercial dog walkers within GGNRA is the through the permit system in the proposed rule. Permits will be required for anyone who walks between 4 and 6 dogs. Qualified permittees will receive annual permits and will only be allowed to walk 4-6 dogs per walker from Monday-Friday between 8 a.m and 5 p.m. in seven park areas. Permits may be revoked for non-compliance. This approach to regulating and controlling commercial dog walking is consistent with NPS policy. The NPS Management Policies allow the issuance of permits for special park uses that provide a benefit to an individual, group or organization rather than the public at large, that require some degree of management control to protect resources and the public interest and that are not prohibited by law or regulation.

CONCERN STATEMENT: (Concern ID: 53177) NPS should produce an annual report with statistics regarding compliance, based on monitoring of the conditions at Golden Gate National Recreation Area. The NPS should use adaptive management to implement the plan based in part on that report. There should be a clearly defined compliance rate in place that triggers further review under the Monitoring Management Strategy.

Representative Quote(s):

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 366100 **Organization Type:** Unaffiliated Individual

Representative Quote: Finally, the National Park Service should produce an annual report with statistics regarding compliance with the existing rules (whether it be the 1979 Pet Policy or the new dog management rule). The report should include site-specific information on (1) statistics of compliance, (2) counts of incidents involving dogs, (3) an estimate of costs for (a) enforcement, (b) natural resource damages, and (c) other incidental costs associated with managing dog-related recreation at the site. The annual report will assist in adaptive implementation of the dog management plan and help the public and the Park Service understand the true financial cost of this recreational activity in the Park.

Corr. ID: 6678 **Organization:** Wild Equity Institute **Comment ID:** 369621 **Organization Type:** Non-Governmental

Representative Quote: The SETS incorporates a monitoring-based management strategy that allows Park Service staff to monitor noncompliance and impacts to natural resources, rather than the initial automatic triggers that were originally proposed. This strategy allows management actions to be implemented when the level of compliance is deemed unacceptable based on violations and/or impacts to resources.

However, this leaves the door open for limited enforcement by the Park Service. There must be some kind of demonstrable commitment of enforcement from the Park Service, rather than simply a wait-and-see approach. If the Park Service must use adaptive management, it still needs accountability mechanisms in place that guarantee effective management of the GGNRA. One change that should be made is a lower percentage of compliance triggering further review for an area. The Park Service previously admitted that it was only striving for 75% compliance, and now it does not even have a specific threshold at all, only what will be deemed unacceptable. Even if there are no measures that apply automatically, there should still be a clearly defined compliance rate in place that triggers further review. The SETS states a 75 percent threshold could trigger restrictions in some areas by only one hundred violations, while other sites might require several thousand violations before a change was implemented, despite greater impacts to resources and values in the latter case. (SEIS pg. 64). The same amount of review that would be required to determine what is unacceptable for a site could be done during the current planning phase. This would promote transparency and allow for public review of the Park Services plan to address non-compliance in each area. The environmental review process is intended to be comprehensive and failing to set specific goals thresholds does nothing but further delay the inevitable.

Response: GGNRA will compile annual data reports as input to management on compliance based on the monitoring management program. The purpose of the monitoring management program is to ensure that there are no unacceptable impacts on park resources, visitors, or park employees as a result of non-compliance with the new rule. The Superintendent may initiate primary or secondary management actions to improve compliance. Please see chapter 2 of the final plan/EIS for more information on the Monitoring Management Program. The framework for this program will include both indicators and thresholds (ie. triggers) for action, and be peer reviewed in accordance with DOI and NPS scientific integrity policies.

CONCERN STATEMENT: (Concern ID: 53178) Commenters felt that the definition of voice control should be better defined and the effectiveness of voice control should be evaluated.

Representative Quote(s):

Corr. ID: 3834 **Organization:** Not Specified **Comment ID:** 359949 **Organization Type:** Unaffiliated Individual

Representative Quote: Unless you have a clear and verifiable definition of what constitutes complete and 100% voice control of a pet by a dog owner or walker. This is ambiguous and unenforceable. This should not be an acceptable method for walking dogs along the public paths. I regularly see dogs walking well behind or out of visual eye sight of owners who are distracted or focused on other things. These owners are not in control of their pet. This also creates more ambiguity making enforcement difficult since technically they may be within voice range and therefore meeting a vague definition of under voice control.

Response: Voice control is defined as being able to immediately recall a dog to one's side, without regard to circumstances or distractions, and attach a leash to the dog's collar. NPS has added 'within direct eyesight of the dog walker' to the definition to ensure each dog walker is always aware of his/her dog's behavior. The effectiveness of voice and sight control on a particular dog is often a product of the training of each dog walker and dog. The NPS encourages all users of voice and sight control areas to take behavioral training classes with their dog. Having a demonstrable standard for recall reinforces the need for owners to train their dogs appropriately. Field staff will be trained in what constitutes appropriate recall to facilitate education about and enforcement of this standard. Compliance with recall standards will be monitored and addressed through the monitoring management program.

CONCERN STATEMENT: (Concern ID: 53179) Some commenters made suggestions for more stringent regulations to protect special status species given the impacts of dogs on these species, while others suggested that less stringent regulations be put in place based on the lack of impacts from dogs on special status species.

Representative Quote(s):

Corr. ID: 1450 **Organization:** Not Specified **Comment ID:** 352579 **Organization Type:** Unaffiliated Individual

Representative Quote: NONE of the alternatives for Ocean Beach allow dogs off leash west of Lincoln to Sloat. Leashing dogs here is completely untenable. This is the most urban stretch of beach north of LA. Human concerns trump the birds on this one. The Snowy Plover can find another place to roost, it's really just that simple. We can't turn back the clock. It's too late. The humans have already arrived on this little stretch of beach.

Corr. ID: 1682 **Organization:** Not Specified **Comment ID:** 353567 **Organization Type:** Unaffiliated Individual

Representative Quote: The Summary of the Management Report states clearly that the impact of leashed dogs to the endangered red legged frogs, garter snakes and butterflies would be negligible and would be minor to other wildlife. If the ecology is not threatened, such a restrictive policy is totally unjustified. It is hard for me to comprehend

Corr. ID: 5200 **Organization:** *Not Specified* **Comment ID:** 362588 **Organization Type:** Unaffiliated Individual

Representative Quote: Invaluable wildlife, such as the snowy plover (and all other native species), must be protected from off-leash dogs. Off-leash dog running should not be permitted anywhere in GGNRA, but if, for political reasons, it is, it should be restricted to areas of no habitat value where native wildlife will not be harmed.

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 366905 **Organization Type:** Unaffiliated Individual

Representative Quote: The DMP is also inadequate for protecting Snowy Plover habitat because it does not include the entire portion of Crissy Field and Ocean Beach. It draws imaginary boundaries that do not comport with typical visitor's understanding of GGNRA, and the plovers are not, to the best of my knowledge, able to discern where these boundaries are either. A typical visitor with a dog will not always know if he or she is entering an area where pets are restricted, especially if the regulatory signs are vandalized or torn down by individuals who disagree with the rules, as too frequently happens. This, again, will invite violations of pet regulations as people claim ignorance or confusion over the exact boundary. A closure prohibiting pets- -on- or off-leash- -should apply to all of Ocean Beach and Crissy Field.

Response: Protection of park resources is a core objective of the dog management plan, and as such dog related impacts will be monitored as part of the Monitoring-Based Management Program. If resources are determined to be "approaching unacceptable impact levels," primary and secondary management actions would be implemented as described in chapter 2 of the final plan/EIS.

CONCERN STATEMENT: (Concern ID: 57376) The dog management policies of Golden Gate National Recreation Area should coincide with those of the city and county of San Francisco.

Representative Quote(s):

Corr. ID: 693 **Organization:** *Not Specified* **Comment ID:** 352951 **Organization Type:** Unaffiliated Individual

Representative Quote: Having read the draft proposal for dog management on GGNRA lands, I would like to comment that the proposal is much too restrictive. Especially at Fort Funston and Crissy file, where off leash dogs have been allowed for decades.

Please loosen the restrictions proposed and further, adopt a similar set of restrictions as the city and county of San Francisco.

Response: NPS staff obtained dog management policies and other applicable information from a variety of state, regional, county, and city park and recreation agencies. Please see chapter 1, Summary of Background Conditions and Review of Literature, in the final plan/EIS, and chapter 2, Alternative Elements Eliminated from Consideration, Allowing More than Six Dogs per Dog Walker, for more information.

CONCERN STATEMENT: (Concern ID: 57378) On-leash dog walking should be permitted at Phleger Estate in San Mateo County.

Representative Quote(s):

Corr. ID: 1616 **Organization:** *Not Specified* **Comment ID:** 353210 **Organization Type:** Unaffiliated Individual

Representative Quote: I would like to see GGNR open up Phleger Estate to leashed dogs.

Response: The Phleger Estate was not one of the 22 sites analyzed in the dog management plan/EIS as it has never been a park dog walking area, and falls outside the scope.

CONCERN STATEMENT: (Concern ID: 57380) Snowy plovers at Ocean Beach should be moved to the Farrallones if they are being impacted by dog walking. Dogs should continue to have access at Ocean Beach.

Representative Quote(s):

Corr. ID: 208 **Organization:** *Not Specified* **Comment ID:** 350114 **Organization Type:** Unaffiliated Individual

Representative Quote: Humans, dogs, cats and other animals have the same rights to access Ocean Beach as snowy plovers. If these birds are so effected by the presence of other beings (which includes wildlife), move them off to the Farrallones and they can thrive without any outside influences.

Response: Snowy plovers are native to Ocean Beach and are also protected under the Endangered Species Act. Removal of all Snowy Plovers from their native habitat in order to support recreational use is inconsistent with NPS policy.

AL1010 - Suggest an Alternative Element that has Been Dismissed

CONCERN STATEMENT: (Concern ID: 53205) Commenters suggested NPS charge fees to walk dogs off leash, either in conjunction with permits or licenses, or simply as use fees.

Representative Quote(s):

Corr. ID: 51 Organization: *Not Specified* **Comment ID:** 343271 **Organization Type:** Unaffiliated Individual

Representative Quote: I would also suggest permits (\$1000 a year per dog) to be able to use the off leash areas. Many dog owners who prefer off leash areas see their dogs as children and \$1000 a year is reasonable as it is a lot less expensive than pre-school or day care or after school activities. They should pay this minimal fee to essentially enjoy exclusive use of those designated off leash areas. Right now they are getting it for free while the rest of don't get to enjoy those areas.

Corr. ID: 91 Organization: *Not Specified* **Comment ID:** 339924 **Organization Type:** Unaffiliated Individual

Representative Quote: The only thing I would entertain, is the addition of a fee based permit system to off set the costs of Park Maintenance at the different parks that allow dogs to walk off leash.

My last thought is that the GGNRA could issue fee based permits for dogs who visit Ft Funston and other parks that allow dogs.

Corr. ID: 304 Organization: *Not Specified* **Comment ID:** 350545 **Organization Type:** Unaffiliated Individual

Representative Quote: I would in fact be willing to pay for the privilege to walk my dog off leash at Rodeo. Dog owners could, for example, pay \$150 per year for a permit proceeds of which could be use for beach cleaning/maintenance as well as enforcement of "dog rules" (e.g., fines for lack of dog feces clean up, aggressive dog behavior, etc.). This would be a small price to pay for the ability to visit such a magical place with our friends.

Corr. ID: 1296 Organization: *Not Specified* **Comment ID:** 352258 **Organization Type:** Unaffiliated Individual

Representative Quote: Since this has been going on nothing has been done to repair walking trails or to remove sand from the trails. Is that because GGNRA wants NO ONE on the land? If dogs are not allowed off leash, the parking lot would be empty. Why can't you leave it the way it is and perhaps charge a small fee for upkeep?

Response: During the public comment period for the draft plan/EIS, commenters suggested requiring a daily, monthly, or annual fee at the park for dog walking. The fees collected could cover maintenance or restoration of the area, for example. NPS has considered but dismissed charging fees to all dog walkers. Dogs are allowed in NPS units servicerwide under 36 CFR 2.15, and no fees are charged in other park units for dog use. GGNRA has noted that dog walking is an appropriate use of the park. What sets GGNRA apart is both the off-leash use, and the larger number of dogs at GGNRA, particularly the additional management concerns that arise from the walking of multiple dogs at one time. Therefore, NPS exercised its discretion to require a special use permit for those who walk between 4 and 6 dogs. Permit fees from these permits will be used to support the costs of the permit program. Permit fees for particular off-leash activities and uses as part of a permit and training program could also be implemented under the monitoring-based management program should impacts to resources or the number or type of violations approach an unacceptable impact. Thus, while GGNRA is prohibited by law from charging entrance fees, fees collected pursuant to a permit would be a special use recovery fee, not an entrance fee.

CONCERN STATEMENT: (Concern ID: 53206) Commenters suggested restricting use by time of day or day of the week.

Representative Quote(s):

Corr. ID: 254 Organization: *Not Specified* **Comment ID:** 350361 **Organization Type:** Unaffiliated Individual

Representative Quote: Instead of completely shutting down off-leash for places like Fort Funston, Land's End and Ocean Beach there be off-leash hours. For example mornings and evenings. I understand the concern at Land's End during high tourist hours (10-5) but not during low tourist hours (5am-10am & 5pm-8pm/closing) Also I think the dogs in the early morning help to ward off the coyotes in some of these larger areas. I think it would serve our community better if hours of off-leash dog use were imposed rather than a complete ban of off-leash use.

Corr. ID: 422 Organization: *Not Specified* **Comment ID:** 351347 **Organization Type:** Unaffiliated Individual

Representative Quote: Did you ever consider making on-leash requirements on the weekends and let us locals have off-leash Monday through Friday?

Corr. ID: 510 Organization: *Not Specified* **Comment ID:** 351839 **Organization Type:** Unaffiliated Individual

Representative Quote: My observation is that you are not considering possibilities for dog management at Muir Beach

other than requiring that all dogs be leashed at all times. I would like you to consider one of the following compromises so that the local residents feel heard and represented:

- A. Allow dogs to be off leash on weekdays because the use of the beach is low on those days. Require leashes on weekends.
- B. Allow dogs to be off leash until noon every day and leashed after noon. This alternative will give some weekend time to local residents who work elsewhere during the week.
- C. Allow dogs off leash at all times except peak times during the summer months.

Corr. ID: 606 **Organization:** *Not Specified* **Comment ID:** 352710 **Organization Type:** Unaffiliated Individual
Representative Quote: As far as people and dogs.... what about having times when dogs are not allowed? For example between 12 and 3 in the afternoon or something. That way if people REALLY want to go hiking without dogs they have that option.

My suggestion about times for dogs and times for people could be particularly useful at Crissy Field. Why not have afternoons for one and mornings for the other? That way everyone gets their needs met.

Corr. ID: 2038 **Organization:** *Not Specified* **Comment ID:** 355457 **Organization Type:** Unaffiliated Individual
Representative Quote: It might be important to make a distinction between weekday and weekend policies. During the week, most of the GGNRA Sites have very few visitors. As such, dog use could and should be unrestricted. But on the weekends, use skyrockets. Perhaps then there could be dog-specific zones or tighter restrictions.

Response: Time of use restrictions can be difficult to enforce and confusing to park visitors. Time of use has also been suggested for times when visitor numbers are low (early am or late pm), but these are generally the times when wildlife numbers are higher. Time of use is being used as a permit condition because permits can be more specifically managed and restricted if permit conditions are not met. This management concept and tool, though, will remain an option for dog management in future decision-making, including as an optional management response through the monitoring management program. Please see chapter 2, National Park Service Preferred Alternative and Alternative Elements Eliminated from Further Consideration for additional rationale for time of use restrictions.

CONCERN STATEMENT: (Concern ID: 53207) Commenters stated that NPS should expand off-leash dog walking within GGNRA, specifically along trails, fire roads, and beaches. Commenters stated that some trails should be made available for off-leash dog-walking.

Representative Quote(s):

Corr. ID: 281 **Organization:** *Not Specified* **Comment ID:** 350460 **Organization Type:** Unaffiliated Individual
Representative Quote: There also needs to be some trails that dogs can be off-leash. It is important for dogs to learn to walk with their owners under voice command.

Corr. ID: 1070 **Organization:** *Not Specified* **Comment ID:** 351525 **Organization Type:** Unaffiliated Individual
Representative Quote: I would also request that fire roads universally allow voice control, assuming no presence of endangered species in the vicinity.

Corr. ID: 1109 **Organization:** *Not Specified* **Comment ID:** 351650 **Organization Type:** Unaffiliated Individual
Representative Quote: The ability to enjoy national parks with our dogs off leash and under voice control is one of the incredible things that sets Marin apart.

I want to voice my strong support for the expansion of off-leash dog areas and the belief that this is an important aspect of our community.

Corr. ID: 1131 **Organization:** *Not Specified* **Comment ID:** 351688 **Organization Type:** Unaffiliated Individual
Representative Quote: I don't support increased restrictions on dogs in Marin County, and urge the federal government (as well as state, county and municipal governments) to allow off-leash dogs on all beaches and trails, so long as dogs are within owners' voice control.

In those areas where habitat restrictions are needed, rope off those areas in accordance with a publicly-approved natural resource management plan. Otherwise, allow the public, and their pets, to enjoy their (publicly-owned!) resources.

Corr. ID: 2642 **Organization:** *Not Specified* **Comment ID:** 356965 **Organization Type:** Unaffiliated Individual

Representative Quote: This plan will not allow off-leash dog walking on any trail anywhere in the GGNRA. There is no evidence presented that off-leash dog walking on GGNRA trails has had any negative impacts. Despite this, the GGNRA decided not even to consider the possibility of off-leash dog walking on any trails at all. This results in a major restriction of off-leash dog walking in Marin County in areas where it had been practiced for decades.

Response: Expanding both on-leash and off-leash dog walking areas was considered in the final plan/EIS. Additional information can be found in chapter 2, Alternative Elements Eliminated from Further Consideration.

CONCERN STATEMENT: (Concern ID: 53209) Commenters stated that GGNRA should impose fines or penalties for visitors who do not control their dog, pick up after their dog, or whose dog causes injury to another visitor.

Representative Quote(s):

Corr. ID: 1151 **Organization:** *Not Specified* **Comment ID:** 351778 **Organization Type:** Unaffiliated Individual

Representative Quote: I do think that there should be stiff fines/penalties to dog owners who do not control their pets or who fail to clean-up after their pets. Perhaps this will encourage everyone to appreciate the opportunity to continue using GGNRA trails and beaches.

Corr. ID: 1192 **Organization:** Golden Gate Audubon Member **Comment ID:** 351955 **Organization Type:** Recreational Groups

Representative Quote: The GGNRA is the only U.S. park allowing unleashed dogs, so Snowy Plovers at Ocean Beach Crissy Field are threatened. Needed are enough dog-free trails so wildlife is allowed to live and flourish without predator, i.e., dog worries. Off-leash areas need fencing. New rules should allow the elderly to walk, families to picnic people to hike, jog watch birds. I'm not advocating a ban on dogs, but instead, want to see a balance so both dogs and birds can be protected, as well as people who enjoy these spectacular areas of nature.

Response: The final plan/EIS prohibits uncontrolled dogs and failing to properly dispose of dog feces. NPS law enforcement personnel will be able to cite individuals who violate these provisions. Fines and penalties for violating NPS regulations are imposed by the federal courts. The NPS does not have the ability to impose fines itself.

CONCERN STATEMENT: (Concern ID: 53210) Commenters suggested that NPS should restrict dog-walking seasonally to protect birds and other wildlife.

Representative Quote(s):

Corr. ID: 1173 **Organization:** *Not Specified* **Comment ID:** 351902 **Organization Type:** Unaffiliated Individual

Representative Quote: I do not see why we can't both protect the fauna and flora, as well as provide realistic open space for people with dogs by perhaps making the restrictions seasonally effective, in order to protect migrating/nesting birds and other wildlife. Sensitive vegetation/soils, sand dunes, and even historical relics, can be fenced off from both dogs and people

Response: The final plan/EIS establishes year round closures for sensitive areas, including snowy plover areas at Ocean Beach and Crissy Field, as well as changes in use in other sensitive wildlife or plant areas in the park to better protect resources; and incorporate seasonal closures at Muir Beach and Rodeo Beach for seasonal creek/ocean connectivity to protect fish passage. These restrictions are key protections and will be among the first to be implemented.

CONCERN STATEMENT: (Concern ID: 53211) Commenters stated that NPS should consider a citizen-based reporting system to report pet policy violations.

Representative Quote(s):

Corr. ID: 1682 **Organization:** *Not Specified* **Comment ID:** 353559 **Organization Type:** Unaffiliated Individual

Representative Quote: I suggest a program where citizens are allowed to report to the NPS dogs/owners who are not obeying the spirit (if not the letter) of policies included in the final management plan. People who are upset by a dogs behavior could take a photo of the dog/owner or get the dogs license number in order to make a report to GGNRA staff. Most people routinely walk their dogs in the same areas, so rangers on patrol could be on the lookout for dogs that had been reported. A suitably substantial fine would encourage better compliance. The nature of this offence is such that only periodic enforcement may be adequate.

Response: Several suggestions provided by commenters for enforcement would not be feasible, as outlined in the Alternative Elements Eliminated from Further Consideration section of chapter 2 of the final plan/EIS. Enforcement strategies eliminated from further consideration based on feasibility include the use of volunteer law enforcement personnel. NPS Director's Order 7, Section 8.4 states that the Volunteers in Parks Act of 1969 does not permit use of volunteers for law enforcement work such as issuing citations. However, volunteer stewardship and/or trail patrol groups will be encouraged to assist in informing

users of the rules and reporting incidents to NPS personnel in a timely manner.

CONCERN STATEMENT: (Concern ID: 53212) Commenters stated that NPS should rotate areas where dogs are off-leash; this could reduce the damage to vegetation from overuse.

Representative Quote(s):

Corr. ID: 2658 **Organization:** *Not Specified* **Comment ID:** 354817 **Organization Type:** Unaffiliated Individual

Representative Quote: The only place they will be able to go in San Francisco county will be McLaren Park. How will 3000/dogs a day impact that tiny 30 acres? We need more areas not less. If an area is over used, then you need a plan to rotate acreage. You need a system like in skin resorts of hard, easy, moderate places, you need to teach people what works and doesn't work for hiking. Keeping dogs off trails is NOT the answer.

Response: Rotating areas between on and off-leash dog walking can cause confusion among visitors and is difficult to enforce; in some cases, where it is feasible, some part of a larger VSCA may be closed for restoration while the remainder stays open and is later rotated for restoration. Rotating use of each site is, otherwise, not a preferred approach for dog walking. However, VSCAs could be periodically closed to allow re-growth of vegetation on an as needed basis. In addition, the monitoring management program ensures continued protection of park resources. Through monitoring, if it is determined that dog-related impacts to park resources are approaching an unacceptable level, primary and secondary management actions will be implemented. These management actions are described in chapter 2 of the final plan/EIS and can include additional fencing, increased buffer zones, and additional restrictions and closures.

CONCERN STATEMENT: (Concern ID: 53213) Commenters believe that off-leash areas could be made safer by requiring dog owners to take their dogs through classes and obtain certification in order to enjoy the benefits of off-leash recreation, especially when handling more than one dog. Some classes and certifications suggested include: pack management training, the AKC Canine Good Citizen test, and the SPCA's open space etiquette class. Commenters also state that all dogs should be vaccinated and licensed and that dog walkers and owners should be required to carry identification that would be readily available, and visible, in case of an incident.

Representative Quote(s):

Corr. ID: 205 **Organization:** *Not Specified* **Comment ID:** 350108 **Organization Type:** Unaffiliated Individual

Representative Quote: I do want to comment about the commercial dog walkers and the owners of multiple dogs that walk at Fort Funston. I feel that the commercial dog walkers do include experts but this group also includes some individuals with much less training. I believe ALL walkers (commercial / private citizens) should be required to complete pack management training and dog training certifications before being permitted to walk more than TWO dogs off leash or on. I would be thrilled to see a permit of this nature that required the walkers to carry a photo id badge whenever walking dogs anywhere in the city. Dog trainers with pack management training are very capable of walking six dogs off leash in an open space like Fort Funston. Fort Funston is ideal for dog hikes as its layout is quite safe for them.

Certainly, I believe an upgrade of commercial dog walking guidelines needs to be considered. Dog trainers with pack management training are the best qualified to walk 6 dogs off leash. Those without this training would definitely be less able to guide dogs..though I am sure there are some that have a natural gift, I would prefer they all be formally trained. Those without formal training could perhaps apprentice with those more qualified.

Corr. ID: 270 **Organization:** *Not Specified* **Comment ID:** 350395 **Organization Type:** Unaffiliated Individual

Representative Quote: In the non-protected areas of Ocean Beach, and in Sutro Park, I suggest that dogs should be allowed off-leash IF (and only if) their owner can show physical evidence (ie the test certificate) of that dog having passed the AKC Canine Good Citizen Test, when asked by any park police officer. Here is a link describing this well-established test: http://www.akc.org/events/cgc/training_testing.cfm

The AKC Canine Good Citizen Test is readily available to SF dog owners through the SFSPCA training programs as well as through private AKC certified dog trainers. This is the test used to certify Therapy Dogs (one of my dogs serves in the VA hospital). Passing the AKC Canine Good Citizen Test requires significant effort by the dog owner, and demonstrates good temperament, as well as obedience training, of their dog. Here is a link to the SFSPCA test page: <http://www.sfspca.org/programs-services/dog-training/classes/canine-good-citizen>

The Canine Good Citizen certificate should be a requirement for ALL off-leash dogs, everywhere - - and would be just as easy to verify as checking to see if that dog has a current dog license; just ask the owner to show a current test certificate - - we responsible owners would be happy to do this, and to help inform the public about this change.

Corr. ID: 2451 **Organization:** *Not Specified* **Comment ID:** 358954 **Organization Type:** Unaffiliated Individual
Representative Quote: Instead of curtailing off-leash privileges, the GGNRA could institute a dog "green tag" system - which certifies dogs and their owners to use the area. Irresponsible dog owners should have their privileges suspended, instead of all people losing access to a particular dog walking area.

Corr. ID: 2852 **Organization:** *Not Specified* **Comment ID:** 357639 **Organization Type:** Unaffiliated Individual
Representative Quote: If anything, require dog owners to certify that their dogs are capable of being "off leash". That way, uncontrollable dogs must remain on leash and they won't spoil the "off leash" privileges for the mostly capable "off leash" dogs in Marin county.

Corr. ID: 4961 **Organization:** *Not Specified* **Comment ID:** 361847 **Organization Type:** Unaffiliated Individual
Representative Quote: In this addendum, I would like to reiterate the importance of ensuring all dogs that use GGNRA are licensed in the owners' county of residence. This is a very important from a public and canine health and safety perspective. It is important because licensing helps to prevent the transmission of disease and rabies from dog to people and from dog to dog. A dog can only receive its annual license if it has received certain inoculations such as rabies. Assuming the dog's license is current; if the licensed dog were to bite a person, the transmission of rabies would be non-existent.

Corr. ID: 4961 **Organization:** *Not Specified* **Comment ID:** 361848 **Organization Type:** Unaffiliated Individual
Representative Quote: To help the ranger with enforcement, NPS could include in the GGNRA dog management regulations that the dog's license tag must be visible to allow random, unplanned inspection, within GGNRA boundaries, by the ranger in order to confirm the status of the dog's license. In the event displaying the license tag is not possible, the person walking the dog would need to present the papers confirming the dog license status to the park ranger.

Response: Please see chapter 2, "Alternative Elements Eliminated from Further Consideration" for information certification and tag programs. While training is important to support dog management within a voice and sight control area, Colorado Open Space & Mountain parks has found that their original training program was insufficient in many areas, based on their own monitoring program, and they have been evaluating what can be most effective. Through its monitoring & management program, GGNRA could implement a training and certification or permit requirement, after trying other primary management actions, if noncompliance with the new rule continues to approach an unacceptable level. The suggestions of AKC's Canine Good Citizen test and SPCA open space etiquette are good examples. In regard to vaccinations and licensing, all dog walkers will be required to have the dogs they walk both licensed in their county of residence, and vaccinated for rabies; they will also be required to either carry current tags for such from the county or be able to produce proof of such for any law enforcement officer.

CONCERN STATEMENT: (Concern ID: 53214) NPS should consider making all of GGNRA on-leash, with only a few fenced areas for off-leash.

Representative Quote(s):

Corr. ID: 5905 **Organization:** *Not Specified* **Comment ID:** 364513 **Organization Type:** Unaffiliated Individual
Representative Quote: This land is for the use and enjoyment of people first and foremost and there is no reason that dog owners cannot leash their animals for the protection and respect of others. This is a major public safety issue as there are several incidents throughout the year. I strongly support the entire area being leash only, with a few specific fenced areas where dogs can run off leash.

Response: All off-leash areas will be demarcated by landscape design solutions which will include fencing and vegetative barriers where needed and feasible.

CONCERN STATEMENT: (Concern ID: 56085) The NPS should implement a certification/tag program similar to the Boulder, Colorado program.

Representative Quote(s):

Corr. ID: 6717 **Organization:** K&L Gates LLP **Comment ID:** 499890 **Organization Type:** Unaffiliated Individual

Representative Quote: The NPS should consider a certification/tag program comparable to one implemented in Boulder, CO. Based on how much NPS is willing to spend on its preferred alternative, there appears to be funding available for a certification/tag program. A certification/tag program can also be developed through alternative funding mechanisms, including community-based models, use of the parks conservancy resources, and hybrid approaches (e.g., where some resources from the current proposed monitoring based management plan are reallocated to other strategies such as certification/tag program). Advantages of a green tag program are many, as it allows enforcement to target problem users (the real cause of issues), not problem areas. A tag program is more fair and effective because responsible dog users are not punished and deprived of recreational resources as a result of a few problem users. Moreover, a tag program can provide a cross-cutting solution to address all impacts of concern including species of concern and other areas needing enforcement. Data from the Boulder program should be considered by NPS, given that that program obtained rates of tag carry compliance over 90% and in the initial year of implementation user conflict dropped by roughly 40%. Compliance rates for leash carry regulations were at almost 100% according to a Boulder representative, and there have been almost no incidents of wildlife harassment. Voice and sight control compliance is in the high 80% to low 90% range. This information did not receive analysis in the DSEIS. Relevant reports on the Boulder experience, including additional modifications to the program being considered, are cited here and CFDG specifically requests that NPS review and consider this information (34).

Response: Please see chapter 2, "Alternative Elements Eliminated from Further Consideration" and the "Monitoring-based management program" for information regarding certification and tag programs. A dog and/or dog walker VSCA training certification program for use in VSCAs similar to this initial Boulder tag program was considered but dismissed. However, an improved educational program in Boulder has been implemented with increased fine schedule and added classroom requirements with initial indications that it may be more successful; but final evaluation has not been completed. The proposed monitoring-based management strategy program includes focused education and enforcement, as well as a revised training certification program based on the improved Boulder model.

AL5000 - Comments on Dog walking Permit System

CONCERN STATEMENT: (Concern ID: 53297) One commenter stated concern about the level of experience of commercial dog walkers and feels that all dog walkers should be required to complete certain levels of training before obtaining a permit to walk 6 dogs off leash.

Representative Quote(s):

Corr. ID: 205 Organization: *Not Specified* **Comment ID: 405830 Organization Type:** Unaffiliated Individual

Representative Quote: I do want to comment about the commercial dog walkers and the owners of multiple dogs that walk at Fort Funston. I feel that the commercial dog walkers do include experts but this group also includes some individuals with much less training. I believe ALL walkers (commercial / private citizens) should be required to complete pack management training and dog training certifications before being permitted to walk more than TWO dogs off leash or on. I would be thrilled to see a permit of this nature that required the walkers to carry a photo id badge whenever walking dogs anywhere in the city. Dog trainers with pack management training are very capable of walking six dogs off leash in an open space like Fort Funston. Fort Funston is ideal for dog hikes as its layout is quite safe for them.

Certainly, I believe an upgrade of commercial dog walking guidelines needs to be considered. Dog trainers with pack management training are the best qualified to walk 6 dogs off leash. Those without this training would definitely be less able to guide dogs..though I am sure there are some that have a natural gift, I would prefer they all be formally trained.

Those without formal training could perhaps apprentice with those more qualified.

Response: All dog walkers walking 4 to 6 dogs will be required to obtain an NPS permit. All permits would require proof of liability insurance and approved dog-handling training through existing regionally or nationally-accredited training courses offered by the local county jurisdiction in which the activity occurs, and as acceptable by the superintendent. In addition, the dog walker must demonstrate the ability to recall their dogs under voice and sight control when requested to do so by an authorized person. Please see Appendix F for details on Special Use Permits.

CONCERN STATEMENT: (Concern ID: 53298) Several commenters believe all dog walkers should have to pay a fee to obtain a permit to use Golden Gate National Recreation Area. These commenters feel that this fee would benefit the park and could be used to help fund programs to monitor or improve the park's resources.

Representative Quote(s):

Corr. ID: 51 Organization: *Not Specified* **Comment ID: 405809 Organization Type:** Unaffiliated Individual

Representative Quote: I would also suggest permits (\$1000 a year per dog) to be able to use the off leash areas. Many

dog owners who prefer off leash areas see their dogs as children and \$1000 a year is reasonable as it is a lot less expensive than pre-school or day care or after school activities. They should pay this minimal fee to essentially enjoy exclusive use of those designated off leash areas. Right now they are getting it for free while the rest of don't get to enjoy those areas.

Corr. ID: 1606 **Organization:** *Not Specified* **Comment ID:** 353186 **Organization Type:** Unaffiliated Individual
Representative Quote: I would support permit requirements for all dog walkers at the parks, with the fees to be used to fund monitoring and education programs. I would also support user permits for non- -dog-walkers, as well. These parks are beautiful, and we should all be willing to spend money to keep them that way.

Corr. ID: 5181 **Organization:** *Not Specified* **Comment ID:** 362475 **Organization Type:** Unaffiliated Individual
Representative Quote: No matter what an area is designated have professional or even non professionals that have more than one dog should pay a concession use licensing fee to use an area. Have them register, license, and pay the fee with NPS and in return NPS supplies the permit. This would aid in conflicts, dog incidents, and even assist in identifying owners if necessary for enforcement.

Response: During the public comment period for the draft plan/EIS, commenters suggested requiring a daily, monthly, or annual fee at the park for dog walking. The fees collected could cover maintenance or restoration of the area, for example. NPS has considered but dismissed charging fees to all dog walkers. Dogs are allowed in NPS units servicerwide under 36 CFR 2.15, and no fees are charged in other park units for dog use. GGNRA has noted that dog walking is an appropriate use of the park. What sets GGNRA apart is both the off-leash use, and the larger number of dogs at GGNRA, particularly the additional management concerns that arise from the walking of multiple dogs at one time. Therefore, NPS exercised its discretion to require a special use permit for those who walk between 4 and 6 dogs. Permit fees from these permits will be used to support the costs of the permit program. Permit fees for particular off-leash activities and uses as part of a permit and training program could also be implemented under the monitoring-based management program should impacts to resources or the number or type of violations approach an unacceptable impact. Thus, while GGNRA is prohibited by law from charging entrance fees, fees collected pursuant to a permit would be a special use recovery fee, not an entrance fee.

CONCERN STATEMENT: (Concern ID: 53299) Some commenters believe that permits for commercial dog walking are unnecessary, as San Francisco city and county already have permitting in place and Golden Gate National Recreation Area has clearly marked signage explaining the number of allowable dogs.

Representative Quote(s):

Corr. ID: 361 **Organization:** *Not Specified* **Comment ID:** 351152 **Organization Type:** Unaffiliated Individual
Representative Quote: Permits: It is not clear to me that the requirement for permits for dog walkers with 4 to 6 dogs is worthwhile. It seems that signs posted on the trails and fire roads designating the allowable times more than 3 dogs could be walked beyond that point would serve the same purpose just as well, and would save both dog walkers and the Park Service a lot of administrative paperwork. But I have no strong opposition to permits so long as they are free and easily obtained. So while I favor Alternative A on permitting, Alternative F is acceptable.

Corr. ID: 375 **Organization:** *Not Specified* **Comment ID:** 351283 **Organization Type:** Unaffiliated Individual
Representative Quote: Permits for commercial dog walking are unnecessary and restrictive. City & county of SF already have this in place!

Response: As a separate federal jurisdiction, NPS must create regulations that address its mission, not that of the adjacent city and county areas; however, consistency with other adjacent areas was a consideration in development of the number of dogs allowed under a permit. Most Bay Area, and many national, land management agencies, including Marin County and East Bay Regional Parks, allow a maximum of 6 dogs per dog walker. The NPS, with input from the Negotiated Rulemaking Committee for Dog Management, concluded that three dogs per walker would be allowed and special use permits at some sites would allow walking up to six dogs per walker. If walking 4 to 6 dogs within GGNRA, an NPS permit will be required. Please see chapter 2 and Appendix F of the final plan/EIS for more information on permitting.

CONCERN STATEMENT: (Concern ID: 53300) Some commenters support the use of permits for larger groups of dogs, stating that issues arise at Golden Gate National Recreation Area with larger groups of off leash dogs. One commenter suggested that the permitting for the park be in line with that of the city of San Francisco and require permits for groups

larger than 3. Other commenters requested that visitors be limited to a maximum of 2 dogs per person.

Representative Quote(s):

Corr. ID: 24 Organization: *Not Specified* **Comment ID:** 343268 **Organization Type:** Unaffiliated Individual

Representative Quote: I do support the limit of dogs off leash to maximum of 3 dogs (commercial or personal). I hope that dog owners will be better able to control their dogs with a limit on the number. I do believe there should be heavy fines for exceeding this number for any reason. I also support the requirement of dogs to have the dog owner's name and number on the dog in any off leash area. I feel that this will help avoid conflicts between dogs owners and other park visitors.

Corr. ID: 801 Organization: *Not Specified* **Comment ID:** 353310 **Organization Type:** Unaffiliated Individual

Representative Quote: I want to stress the importance of limiting the number of dogs in a group to six, and to require permits for groups larger than three.

I have worked in Fort Funston as a Parks Conservancy employee and a volunteer. I have been doing volunteer work at Fort Funston for almost 15 years. I have had very few bad interactions with dogs. However, the couple that did occur are generally with large (> 5) packs. I have also noticed that the animals in such groups are rarely well controlled and often range far off the trails, while dogs being walked individually or in pairs generally keep more or less to designated trails. Thus the restrictions on number of dogs that can be walked is essential.

Corr. ID: 4991 Organization: Golden Gate Audubon Society **Comment ID:** 361895 **Organization Type:**

Unaffiliated Individual

Representative Quote: Visitors to the park should be limited to a maximum of two dogs per person

Corr. ID: 5678 Organization: *Not Specified* **Comment ID:** 364117 **Organization Type:** Unaffiliated Individual

Representative Quote: I strongly support the Draft Dog Management Plan. Visitors should be limited to only two dogs in the park. It is crucial that new dog regulations be enforced.

Corr. ID: 6635 Organization: *Not Specified* **Comment ID:** 367557 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe the GGNRA needs to carefully differentiate between recreational and professional dog walkers. I think the GGNRA should do as the City of San Francisco has done and issue permits that limit the number of dogs walked at one time. Perhaps they could even limit the number of permits issued.

Response: There will be no change to the number of dogs allowed for each dog walker. At some park sites, no more than three dogs per walker would be allowed in order to further protect park resources and visitor safety due to the conditions at the site. This threshold matches a typical county regulation allowing up to three dogs in a residence. Visitors walking 4 to 6 dogs would be allowed within seven park areas under an annual NPS permit and review. Please see chapter 2, Permits for More Than Three Dogs - Commercial and Individual Dog Walkers for more detail.

CONCERN STATEMENT: (Concern ID: 53301) Commercial dog walking is not an appropriate park use and the draft plan/SEIS doesn't justify its inclusion, which fails to provide for visitor safety, disrupts the atmosphere of peace and tranquility, subtracts from public understanding and enjoyment of the park, and undermines a sense of ownership and stewardship for the park. NPS policy re: commercial dog walking should not be determined based on regional politics. National park values should be upheld with the national interest in mind. Commercial dog walking is a local concern and should be managed within the jurisdictional boundaries of local municipalities.

Representative Quote(s):

Corr. ID: 5151 Organization: International Urban Estuary Network/Save the Bay **Comment ID:** 362280

Organization Type: Unaffiliated Individual

Representative Quote: Commercial dog walking is an inappropriate activity for National Park lands. Commercial dog walking has never been legally permitted on any of our National Park lands. Use of the GGNRA by the commercial dog walking industry constitutes an exploitation of parklands strictly for private financial gain.

Commercial dog walking will not provide any service or benefit to park users, will adversely impact park resources and values, and will serve only private enterprise at the expense of the American public. The GGNRA is probably the least desirable Park in the National system in which to allow commercial dog walking, heavily used as it is, in a densely populated urban setting where open space is at a premium.

Permitting commercial dog walking contravenes the NPS Criteria for appropriate park use: it fails to provide for visitor safety, disrupts the atmosphere of peace and tranquility, subtracts from public understanding and enjoyment of the park, and undermines a sense of ownership and stewardship for the park

Response: NPS will manage and limit the number of commercial dog walkers within GGNRA through a permit system. The permit will only allow up to six dogs per walker within specified areas and specified times.

CONCERN STATEMENT: (Concern ID: 53302) All dogs allowed into the park, especially off leash dogs, should be licensed by a local municipality.

Representative Quote(s):

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 403504 **Organization Type:** Unaffiliated Individual

Representative Quote: Moreover, the National Park Service should require that dogs allowed into the park-especially off-leash dogs-should be licensed by a local municipality. The American Veterinary Medical Association strongly supports dog licensing requirements. San Francisco's local SPCA and Animal Care and Control agency also support licensing. To our knowledge, none of the dog advocacy groups involved oppose dog licensing. All agree that responsible pet guardians comply with local ordinances and license their pets.

Response: All dogs walked in GGNRA are required to be licensed and tagged in accordance with applicable ordinances of the county where the dog owner resides. Without tags, owners will be required to produce the paperwork supporting this if asked by a law enforcement officer.

AT1400 - Alta Trail: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53218) Several commenters are concerned with the proposed limitations on dogs along Alta Trail. Commenters would prefer that the trail remains available to off leash dog walking; one commenter stressed the importance of allowing off leash walking on the Donahue side of Alta Trail.

Representative Quote(s):

Corr. ID: 2433 **Organization:** Not Specified **Comment ID:** 358933 **Organization Type:** Unaffiliated Individual

Representative Quote: Oakwood Valley, Alta Trail Map 4-A Yes/In favor:

Comment: This is the best but still unreasonable. The entire area should be voice control since it is all one loop. Having areas where your dog has to be on leash in one spot and then on leash half way in creates artificial areas of conflict and harassment by park officials.

Corr. ID: 5286 **Organization:** Not Specified **Comment ID:** 362876 **Organization Type:** Unaffiliated Individual

Representative Quote: Please do not ban dogs, and certainly leave the Donahue side of the Alta trail as an off leash area, the same with Muir Beach - dogs are an important part of the landscape and of living in the bay area.

Response: Off-leash dog walking on trails and fire roads was considered but dismissed in the final plan/EIS. In addition, off-leash dog walking on the Alta Trail is not feasible because the trail contains mission blue butterfly habitat and there are safety concerns with documented dog / coyote conflicts. The NPS-Donahue easement provides NPS the authority to enforce use restrictions within the easement. Off leash on the Donahue easement itself would serve as a barrier to visitors without dogs, especially considering its importance as one of the principal access points to Alta. Additional information can be found in chapter 2, Alternative Elements Eliminated from Further Consideration.

CONCERN STATEMENT: (Concern ID: 53219) Commenters suggested that dogs be allowed on loop trails as opposed to just out and back trails at Alta Trail and other Marin County sites.

Representative Quote(s):

Corr. ID: 323 **Organization:** Not Specified **Comment ID:** 350585 **Organization Type:** Unaffiliated Individual

Representative Quote: Marin Headlands, Alta trails, Pacheco Fire Rds. -> please allow dogs on loop trails as opposed to out back. (A - A) to offer a more active experience for both dogs and owners.

Response: GGNRA previously changed the preferred alternative following the public comment period on the draft plan/EIS to extend the on-leash dog walking opportunity on the Alta Trail to provide a connection to the Oakwood Valley Trail. A full loop trail within the park on Alta, or out from Alta and back thru Oakwood Valley would traverse mission blue butterfly habitat, so has been considered but dismissed. Both sensitive and contiguous habitat, as well as providing non-dog walkers a dog free experience are principal reasons for not creating more loop trails in Marin county. Please see chapter 2, Preferred Alternative for Alta Trail for additional rationale.

AW1000 - Animal Welfare: Impact on/to dogs

CONCERN STATEMENT: (Concern ID: 53303) Many commenters believe that off leash exercise is the key to keeping their dogs mentally and physically healthy. The off leash areas of Golden Gate National Recreation Area provide dogs and their owners relief from congested city life. Without these open natural areas, many dog owners feel that their dogs would suffer, as their physical and social needs could not be met and their quality of life would be degraded. The beaches also provide excellent conditions to train dogs to listen to their handlers, despite immense distractions. Conversely, several commenters stated that on-leash exercise has been just as effective in maintaining their dog's health and more on leash restrictions would not cause any suffering.

Representative Quote(s):

Corr. ID: 1172 **Organization:** Golden Gate National Parks Conservancy **Comment ID:** 351898 **Organization Type:** Unaffiliated Individual

Representative Quote: Over a 30 year period, our family had the pleasure of owning two dogs, consecutively. As we lived in the City, we wouldn't think of allowing our dogs to run freely without a leash. I never observed that the dogs felt "deprived". When walking them, if we came to an "open area" where unleashed pets were allowed, we untied them.

Corr. ID: 1447 **Organization:** *Not Specified* **Comment ID:** 352577 **Organization Type:** Unaffiliated Individual

Representative Quote: On-leash areas do not provide the same outlet as off-leash areas. For some dogs, this is not as much of an issue. For others, it makes all the difference between a well-behaved dog and one that turns to mischief or worse. Because of the density of the human population, one might argue that it's even more important for dogs who live in an urban area to have the proper outlet for their energy.

As an example, my dog (26 lbs) was rescued from a shelter. He had previously been a stray and so is very fearful. We have taken several obedience classes and used private training, but his fear is deeply ingrained. He won't walk farther than 1/2 block in either direction from our house, which certainly doesn't give him the proper amount of exercise. However, he feels safe at Fort Funston and at beaches, so we take him off-leash there so he can get the proper exercise. If we don't take him, he is definitely more difficult to manage. These off-leash areas make a huge difference - - walking him on-leash at these places is not nearly as effective

Corr. ID: 1925 **Organization:** *Not Specified* **Comment ID:** 354563 **Organization Type:** Unaffiliated Individual

Representative Quote: Some of the best off-leash training work I've done with my dog has been at the beaches, where there are canine distractions, no fences, and new stimuli (sand, sea smells, birds) that compete with her attention. The training successes translate into a dog who is confident, calm, and able to listen to commands in spite of distractions around the busy streets of Richmond, Berkeley, and El Cerrito where we walk. The benefit is not only for me and my dog, but for everyone who she comes into contact with.

Corr. ID: 3821 **Organization:** *Not Specified* **Comment ID:** 359906 **Organization Type:** Unaffiliated Individual

Representative Quote: Our rescue dog was extremely fearful of people and because we have been bringing her to Crissy Field she has improved immensely. She can't wait to get out of the car when we get to the park, she manages herself very well and has a great time running and playing with the other dogs. Please keep the park as it is, the park is truly a park for all, we love it.

Corr. ID: 5349 **Organization:** *Not Specified* **Comment ID:** 363000 **Organization Type:** Unaffiliated Individual

Representative Quote: It is critical to the emotional and physical health of dogs to be able to exercise fully. This is rarely possible on leash or in small postage stamp sized "dog areas" If dogs are not given adequate exercise they are prone to more physical health problems. More importantly they often exhibit more behavior problems that affect people. As a veterinarian of 30 years I can tell you that dogs that need exercise and do not get it are more likely to have aggression related issues, including dog bites. I am concerned that if you do you not continue to provide space for dogs to run you will see an increase in the incidence of dog related problems.

Corr. ID: 6666 **Organization:** San Francisco SPCA **Comment ID:** 369538 **Organization Type:** Unaffiliated Individual

Representative Quote: As the SF SPCA can attest, daily exercise is essential to a dog's proper health and well-being. Exercise affects a dog's behavior, trainability and aggression levels, which are important to properly maintaining public safety in crowded urban environments. Take away off-leash dog areas in the GGNRA, and dog guardians may be unable to meet the physical and mental needs of their pets (also at a detriment to their own healthy, active lifestyles).

Response: The final plan/EIS both recognizes dog walking as an appropriate activity and evaluates the impacts to dog

walkers from restricting access. However, the preferred alternative would establish multiple VSCAs in GGNRA. The majority of VSCAs would be large enough to accommodate private dog walking with few, if any, crowding issues. Off-leash dogs would still benefit from the physical activity and socialization, and would still have the opportunity to walk under voice and sight control within those designated area. Permitting of dog walkers with 4-6 dogs will help relieve some congestion as well and be allowed only in areas that can accommodate it. Finally, the preferred alternative would allow multiple on-leash dog walking areas throughout the park as well which can still provide many health benefits.

CONCERN STATEMENT: (Concern ID: 53305) Commenters stated that dogs act differently on leash and in confined, fenced-in areas than they do when they are unrestricted. Leashes can make some dogs feel trapped, and will lead to less supervision. When their natural reaction to avoid a situation is eliminated, dogs can sometimes resort to acting defensively or aggressively. Additionally, other local parks are overcrowded, which does not give dogs the same experiences as recreating in wide open spaces.

Representative Quote(s):

Corr. ID: 153 **Organization:** *Not Specified* **Comment ID:** 349879 **Organization Type:** Unaffiliated Individual

Representative Quote: Many dogs are aggressive on leash, dogs that are normally passive and playful. After working in shelters and privately training dogs for years, I can tell you that dogs need a lot of exercise and socializing, and they are not able to do it well while restricted on a leash.

Corr. ID: 1362 **Organization:** *Not Specified* **Comment ID:** 352394 **Organization Type:** Unaffiliated Individual

Representative Quote: Dog behaviorists will inform you that off leash exercise is essential to the physical and behavioral health of all larger canines. Frankly, I was a bit surprised at the sheer number of dogs over 50# that daily attended Fort Funston. One might expect a few less, in an area so deficient in open space.

It is well known that dogs greet each other best when left to their own devices, the act of restraining a dog, in the presence of another, can instigate violent behavior. The disparity in the numbers of bad incidents at Fort Funston, as opposed to those of Crissy Field seem to bear that out.

We all know the damage to life and property that an out of control 75# dog can do...

In the interest of public safety, the only logical course of action would be to leave a good thing alone.

Response: The preferred alternative establishes multiple VSCAs in GGNRA. The majority of VSCAs would be large enough to accommodate dog walking with few, if any, crowding issues. Off-leash dogs would still benefit from the physical activity and socialization; and, dogs that do not receive enough exercise or become aggressive when restrained by a leash would still have the opportunity to walk under voice and sight control within the designated areas. Dog management training is recommended for any dog owner visiting GGNRA with their dog, especially if needed to meet voice and sight control requirements.

CONCERN STATEMENT: (Concern ID: 53306) One commenter believes that dogs should be banned from Golden Gate National Recreation Area completely, as well as the city of San Francisco, stating that it is inhumane to keep dogs confined inside houses and apartments all day with small amounts of exercise.

Representative Quote(s):

Corr. ID: 126 **Organization:** *Not Specified* **Comment ID:** 346277 **Organization Type:** Unaffiliated Individual

Representative Quote: This plan allows for too many areas for dogs. Dogs should be banned from the GGNRA. Dogs are destructive. There are too many dogs in the city which is a place that is not suitable for dogs. In part dogs are kept in tiny apartments because dog owners use the open space in the GGNRA as an excuse to this. They rationalize to themselves that walking their dog for 1 hour a day and the rest of the time keeping the dog in a tiny apartment is fair and healthy for their dog. It is not. Dogs are not meant to be in cities especially big dogs. By allowing dogs in the GGNRA you are supporting cruelty to animals.

Response: The objectives, and purview, of GGNRA's dog management plan are described in chapter 1 of the final plan/EIS. These include both resource protection and high quality visitor experiences. Banning all dogs and excluding voice control from GGNRA would not meet these objectives.

CONCERN STATEMENT: (Concern ID: 53307) Many commenters feel that restricting off leash access at Golden Gate National Recreation Area will ultimately lead to an increase in euthanasia rates in the city's shelters. These commenters feel that restricting areas where dogs can run will create behavior problems, which will lead to owners surrendering their dogs to the shelters.

Representative Quote(s):

Corr. ID: 1890 **Organization:** *Not Specified* **Comment ID:** 354462 **Organization Type:** Unaffiliated Individual

Representative Quote: San Francisco sets a very strong example for the rest of the nation with our achievements in terms of humane animal welfare. Animal Shelters from around the country have commended our city and county for having the highest adoption to dog birth ratio in the country where elsewhere dog overpopulation is a problem.

Corr. ID: 2883 **Organization:** DogPAC of San Francisco **Comment ID:** 354906 **Organization Type:** Unaffiliated Individual

Representative Quote: It doesn't take much for a dog owner to throw their hands up in desperation and abandon a pet, should the access to facilities be come difficult. With a plan like GGNRA Dog Management Plan there is certain to be an impact on shelters, rescue adoption agencies and dog training/walking facilities as an increasing number of dog owners will abandon their pets. We already face extreme issues with overcrowding in shelters and stray animal control - why then force beloved pet owners to have to give up their pet when it could be otherwise avoided.

Response: The final plan/EIS both recognizes dog walking as an appropriate activity and evaluates the impacts to dog walkers from restricting access. However, the preferred alternative would establish multiple VSCAs in GGNRA. The majority of VSCAs would be large enough to accommodate private dog walking with few, if any, crowding issues. Off-leash dogs would still benefit from the physical activity and socialization, and would still have the opportunity to walk under voice and sight control within those designated areas. Permitting of dog walkers with 4-6 dogs will help relieve some congestion as well and be allowed only in areas that can accommodate it. Finally, the preferred alternative would allow multiple on-leash dog walking areas throughout the park as well which can still provide many health benefits.

BB1400 - Baker Beach: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53220) Commenters stated that at a minimum, on-leash dog walking should be allowed on all of Baker Beach.

Representative Quote(s):

Corr. ID: 178 **Organization:** Not Specified **Comment ID:** 349992 **Organization Type:** Unaffiliated Individual

Representative Quote: Please modify the play areas to allow at least on leash dogs at Baker Beach, all areas of Ocean Beach, and East Beach at Crissy Field.

Response: To accommodate multiple visitor uses at Baker Beach, South Beach would be available for a no dog experience as this area contains the highest concentration of visitors. North beach would allow on-leash dog walking. Please see the final plan/EIS chapter 2, Preferred Alternative for Baker Beach for additional rationale.

CONCERN STATEMENT: (Concern ID: 53221) ROLAs - Commenters stated that ROLAs should be established within the following locations at Baker Beach: Monterey Cypress Biological Wastelands, north and south ends of the beach, and on the entire beach.

Representative Quote(s):

Corr. ID: 3723 **Organization:** Not Specified **Comment ID:** 359403 **Organization Type:** Unaffiliated Individual

Representative Quote: I suggest that off leash dog walking under voice control continue to be allowed on all parts of Baker Beach. If restrictions are made please consider off leash dog walking on the north or south ends of the beach where there are natural cliff boundaries and less use by humans. Another alternative I suggest would be off leash dog walking allowed weekdays or weekday mornings when there are few beach users other than people accompanied by dogs.

Corr. ID: 6492 **Organization:** Nature in the City **Comment ID:** 367585 **Organization Type:** Unaffiliated Individual

Representative Quote: At Baker Beach, there may be some candidate Monterey Cypress-Ehrharta erecta biological wastelands - sufficient distance from the restored dunes, Battery Chamberlain and other resources - that would be appropriate for a ROLA.

Response: VSCAs would not be established at Baker Beach. The level of use of Baker Beach by dog walkers is much less than the other 3 beaches in GGNRA in San Francisco county where off-leash use has been designated in the new rule, (ie. Crissy Field Central beach, the northern section of Ocean Beach, and Ft. Funston beach). Consequently, Baker Beach was identified to provide a more managed dog walking experience as part of a broader variety of visitor beach experiences in GGNRA; and as such, on-leash dog walking would accommodate both mobility-impaired visitors seeking that experience with their guide dogs without interaction or disruption by other off-leash dogs as well as other visitors from fishermen and their families to alternative beach seekers. In addition, Baker Beach provides important habitat for wintering and migrating shorebirds, and habitat for sensitive dune and coastal bluff plant species found in the dunes and bluffs along the shoreline. Please see chapter 2, Preferred Alternative for Baker Beach for additional rationale.

CONCERN STATEMENT: (Concern ID: 53222) Commenters stated that dogs should not be allowed on the beaches at

[Baker Beach.](#)

Representative Quote(s):

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 366109 **Organization Type:** Unaffiliated Individual

Representative Quote: Baker Beach - The Preferred Alternative for Baker Beach is problematic for several reasons. Splitting the beach into leash-only and no-dog areas will lead to confusion, non-compliance, visitor conflict and continued management problems. Furthermore, allowing dogs near the creek outlet, an area often used by shorebirds, will increase the potential for wildlife conflicts. As a means of eliminating these problems and of creating more opportunities for visitors to enjoy dog-free National Park experiences, the entire Baker Beach area should be designated as a dog-free zone.

Response: To accommodate multiple visitor uses at Baker Beach, South Beach would be available for a no dog experience as this area contains the highest concentration of visitors. North beach would allow on-leash dog walking. Requiring that dogs be on-leash on 'North Beach' would provide an area of protection from disturbance by uncontrolled dogs for wintering shorebirds and rare plants on the hillside while still providing dog walking access at Baker Beach. Please see the final plan/EIS chapter 2, Preferred Alternative for Baker Beach for additional rationale.

CB1100 - Comments Regarding the Monitoring Based Management Strategy

CONCERN STATEMENT: (Concern ID: 53308) Commenters are concerned about the ability of the NPS to effectively protect resources through the Monitoring-Based Management Strategy, as compliance goals and details of monitoring are not expressed and there is no commitment to increased enforcement.

Representative Quote(s):

Corr. ID: 6459 **Organization:** San Francisco League of Conservation Voters **Comment ID:** 368531 **Organization Type:** Unaffiliated Individual

Representative Quote: The entire success of this plan lies in the concept now referred to as the monitoring based management strategy. If this management strategy fails, these rules become meaningless, and we are not just back where we started, but worse. We understand the problem posed by picking a 75% level of compliance measured by violations, which we already suggested were too lax. We are encouraged that the monitoring will look at sites more comprehensively, and in particular paying attention to habitat destruction or other impairment of park resources. We are frustrated, however, that the details of the monitoring plan have yet to be developed, so must yet have to go through yet another public planning process.

Corr. ID: 6631 **Organization:** Not Specified **Comment ID:** 368432 **Organization Type:** Unaffiliated Individual

Representative Quote: One of the most troubling developments in the SEIS is the proposed monitoring-based management strategy, under which Park Service staff will monitor noncompliance and impacts to natural resources and propose mitigation measures at a later date, instead of using automatic triggers that were originally proposed. This development is clearly the result of lobbying and political pressure and does not have any factual relevance. The previous target for 75% compliance was itself far too low to have any meaningful impact on protecting visitor experience or natural resources. Such a compliance level would not change the type and degree of risks to visitors exposed to off-leash activity, as described above under Visitor Safety.

Response: Implementation of the dog management plan includes increased enforcement at park sites and monitoring for non-compliance and impacts to natural resources. The monitoring management program is primarily concerned with compliance concerning dog walking, which includes compliance with regulations designed to protect park resources from impacts. NPS will further identify indicators (levels) of non-compliance, and identify a range of impacts that may approach unacceptable impacts. If impacts to resources occur from dog walking, primary and secondary management actions will be implemented to further protect resources and visitors, including focused enforcement. For more information please see chapter 2, monitoring management program.

CONCERN STATEMENT: (Concern ID: 53309) Several comments offered suggestions for the Monitoring-Based Management Strategy to strengthen the strategy, such as community outreach and education, clear standards and better enforcement including visible, increased, uniformed law enforcement and issuance of citations and tracking of repeat offenders. Commenters stated that draft plan/SEIS fails to identify the mitigation measures that will be undertaken, including closure of ROLAs, from adverse environmental impacts.

Representative Quote(s):

Corr. ID: 5631 **Organization:** Marin Conservation League **Comment ID:** 364039 **Organization Type:** Unaffiliated

Individual

Representative Quote: The revised Monitoring-Based Management Strategy is less rigid than the previous compliance-based strategy, which did not consider the trail context. Nonetheless, given the size and diverse conditions of GGNRA and a limited number of personnel, the Monitoring-Based Management Strategy needs to be supported by clear standards and vigorous enforcement that includes (a) visible increase in uniformed law enforcement presence; (b) increased issuance of citations, particularly to aggressive violators; and (c) tracking of repeat offenders. We agree with others that enforcement of regulations sends the clearest message to people about what is expected of them. Clear and prominent signage is also important.

Corr. ID: 6596 **Organization:** *Not Specified* **Comment ID:** 369628 **Organization Type:** Unaffiliated Individual

Representative Quote: The proposed "compliance-based" approach should be modified to create a baseline of current conditions, and then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

Response: Implementation of the dog management plan includes a public outreach and education program, increased enforcement at park sites, and monitoring for non-compliance and impacts to both natural resources and visitors. If impacts to resources occur from dog walking, primary and secondary management actions will be implemented to further protect resources and visitors. Please see chapter 2 of the final plan/EIS for additional details.

CONCERN STATEMENT: (Concern ID: 53310) Commenters are concerned about the number of dogs that would be displaced from GGNRA and into local dog parks based on the monitoring-based monitoring strategy.

Representative Quote(s):

Corr. ID: 1447 **Organization:** *Not Specified* **Comment ID:** 352575 **Organization Type:** Unaffiliated Individual

Representative Quote: The report includes a section about monitoring-based management strategy. That strategy includes monitoring the number of dogs and dog walkers, among other items. Has any monitoring of the number of dogs (in general, not only for commercial dog walkers) been done as part of the research for the plan? If only 25 dogs use Fort Funston on a day, it's not a problem to relocate those dogs to other city parks. But what happens when hundreds of dogs are relocated? Or thousands? The potential for aggressive incidents increases dramatically if a large number of dogs are relocated to a smaller area.

Response: If noncompliance is high and impacts to park resources occur from dog walking, primary and secondary management actions will be implemented through the Monitoring-Based Management Program. Primary management actions will include focused enforcement of regulations, proposed fine increases, increased outreach and education, a specific training certification program with dog tags for anyone walking or bringing off-leash dogs into the park, time of use restrictions, establishment of buffer zones, fencing, barriers or separations and special use permit (SUP) restrictions. These management actions would not exclude visitors from continuing to walk dogs within GGNRA. If non-compliance continues or additional impacts to park resources occur, secondary management actions would be implemented. These actions could include additional training certification program elements required for use of VSCA's, limiting the number of dogs off-leash at any one time, short or long-term closures to dog walking areas, and/or increases in expansion of buffer zones or implementation of other landscape design solutions that include the adjustment of defined VSCA areas. Short- and long-term closures could be implemented in a worst case scenario where other means to stop unacceptable behavior has not been effective. For additional information on the redistributive impacts, please refer to chapter 4.

CONCERN STATEMENT: (Concern ID: 53311) The monitoring-based monitoring strategy does not distinguish impacts from dogs and from other causes, such as other visitors or climate change. There are concerns that the monitoring-based management strategy would be based solely on compliance with leash laws rather than the actual impacts to the park's resources.

Representative Quote(s):

Corr. ID: 1011 **Organization:** *Not Specified* **Comment ID:** 351427 **Organization Type:** Unaffiliated Individual

Representative Quote: I oppose the Monitoring-Based Management Strategy that replaced the DEIS' Compliance-

Based Management Strategy. The MBMS is still based largely on compliance with leash restrictions. Although the SEIS says the MBMS will consider impacts on resources from non-compliance, it still is primarily focused on mere compliance with leash laws and the GGNRA can consider changing off-leash status for non-compliance even if no impacts on resources or other visitors are reported.

Corr. ID: 4005 Organization: Not Specified Comment ID: 368804 Organization Type: Unaffiliated Individual
Representative Quote: The Monitoring Program (summarized on page 63 of the SDEIS) is an important part of the plan. Thank you for working on improvements to the former version of this element. While improved, it needs more work. For example, it does not address identifying or distinguishing impacts from dogs and from other causes, such as human (e.g., disturbance) or natural impacts (e.g., climate change). This is fundamental to a scientifically valid monitoring and management program. For example, if there is more than one cause - such as people and dogs in a seasonally-restricted wildlife area - any proposed management action should deal with the relevant causes, rather than basing management actions on one cause that may not address the problem. The public should be able to comment on the appropriate response.

An objective monitoring program - based on maintaining long-standing urban recreational uses per GGNRA's organic act - should respond to the data and should allow restoring and increasing dog walking areas, not simply restricting them.

Corr. ID: 6101 Organization: Not Specified Comment ID: 365415 Organization Type: Unaffiliated Individual
Representative Quote: I am opposed to the Monitoring-Based Management Strategy that replaced the previous Compliance-Based Management Strategy. The strategy is still based largely on compliance with leash restrictions and there are no thresholds for violations or other conditions that would trigger any change in status even if on a temporary basis.

Response: NPS is aware that there are many factors impacting resources, including other visitors and climate change, but this plan is directly addressing dog management. The monitoring management program is primarily concerned with compliance concerning dog walking, which includes compliance with regulations designed to protect park resources and other visitors from impacts. NPS will further identify indicators (levels) of non-compliance, and identify a range of impacts that may approach unacceptable impacts. For more information please see chapter 2, monitoring management program.

CONCERN STATEMENT: (Concern ID: 53312) Some commenters are concerned the GGNRA managers would change regulations based on compliance without public input on the changes; however, other commenters recognize that the Monitoring-Based Management Strategy calls for public review and comments. Commenters do not feel that the Monitoring-Based Management Strategy is a significant improvement over the Compliance-Based Management Strategy of the draft plan/EIS and that there should be a clearly defined compliance rate in place that triggers further review.

Representative Quote(s):

Corr. ID: 6101 Organization: Not Specified Comment ID: 403545 Organization Type: Unaffiliated Individual
Representative Quote: The plan allows the GGNRA to unilaterally make additional closures without providing meaningful descriptions of the conditions and metrics that would warrant such actions; these changes in use would not be subject to a requirement that public review and input be obtained. Any compliance based plan needs to be adequately developed with sufficient detail to enable meaningful public comment.

Corr. ID: 6689 Organization: Not Specified Comment ID: 369455 Organization Type: Unaffiliated Individual
Representative Quote: The SEIS presents a "new and improved" Management Strategy which they euphemistically call "Monitoring Based Management Strategy". This new scheme purportedly addresses the comments/ concerns of the public regarding the DEIS. The DEIS plan is in italics above. The SEIS plan is essentially the same except that it modifies the portion of the Management Strategy

First, the discussion of compliance rates has changed from 75% to "deemed unacceptable". Respectfully, this is even worse! We now have a measure of compliance that is totally subjective, with the GGNRA making all the decisions. This is unacceptable.

Further, these short or long term closures could be triggered by any number of conditions totally under the purview of the GGNRA, all of which we have no ability to influence by our actions.

The GGNRA could decide they want to make Fort Funston in its entirety a native plant restoration/habitat; and they can

do so, based upon this language. More erosion at Ocean Beach or the beach below Fort Funston, and surprise- dogs are now banned.

Worse, the language indicates a long term closure would likely require a special regulation.

The entire concept of "compliance based management strategy" is one that has never before been utilized in any other National Park or National Recreation Area by the NPS. The Draft Plan/DEIS states (page 1725) that "the compliance-based management strategy is an important and effective tool to manage uncertainty when proposing new action" and "has been created" to assure successful implementation and long-term sustainability. We argued this policy attempts to allow the implementation of future restrictions without public notice and comment. This is unlawful and should never have been included in the DEIS. We were correct - - so they changed the Management Strategy to include public notice and comment, but their intent has not changed. Because history has shown the GGNRA has their own agenda and cares little about the science or public comment, this SEIS version of a Management Strategy is every bit as much of a poison pill as the original version in the DEIS.

Response: Chapter 2 has been revised to more clearly describe both the Monitoring-Based Management Program's Primary and Secondary responses, level of peer-review, and the compliance required for minor and major changes that could occur during plan implementation, including changes resulting from the Monitoring-Based Management Program. Please see chapter 2, Monitoring-Based Management Program, and chapter 2, Changes to Plan Implementation, for more details.

CONCERN STATEMENT: (Concern ID: 57391) ROLAs should be closed if users are not adhering to the rules or if adverse impacts to natural resources occur.

Representative Quote(s):

Corr. ID: 6670 **Organization:** Sierra Club, San Francisco Bay Chapter **Comment ID:** 369550 **Organization Type:** Unaffiliated Individual

Representative Quote: The Draft SEIS fails to include the only remedy that will ensure that off leash dog users comply with rules for a ROLA which is closure of a ROLA when it is shown that the rules are not followed and that enforcement has not significantly reduced non-compliance with the rules or has resulted in adverse environmental impacts.

The Draft SEIS fails to identify the mitigation measures that will be undertaken, including closure of ROLAs, from adverse environmental impacts. For example, if after a period of monitoring it is determined that off leash walking in a ROLA has caused damage to vegetation or to species in the ROLA, the plan should provide for closure of that ROLA and other measures to restore the habitat and species. The Draft SEIS is inadequate for failing to provide this simple and effective tool for dealing with environmental damage.

Response: If non-compliance is high and impacts to park resources approach unacceptable levels from dog walking, primary and secondary management actions will be implemented through the monitoring management program. Please refer to chapter 2, "Monitoring-based management program" for more details.

CF1400 - Crissy Field: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53223) ROLAs - Commenters suggested allowing ROLAs within the following areas at Crissy Field: East Beach, West Beach (year round, or April through October), middle portion of the airfield, entire airfield, Marina Green, and entire beach area west of the footbridge.

Representative Quote(s):

Corr. ID: 364 **Organization:** Not Specified **Comment ID:** 351265 **Organization Type:** Unaffiliated Individual

Representative Quote: We need East Beach to remain leash free!

And re Crissy Field, East Beach - the only accessible beach for the elderly physically disabled w dogs needing off-leash.

Corr. ID: 1609 **Organization:** Not Specified **Comment ID:** 353194 **Organization Type:** Unaffiliated Individual

Representative Quote: Off leash space is so important to this San Francisco community!!

You need to keep the beach at Chrissy Field, (west of the foot bridge) the open grass area, and Marina Green off leash.

Corr. ID: 3309 **Organization:** Not Specified **Comment ID:** 358120 **Organization Type:** Unaffiliated Individual

Representative Quote: I am writing as a responsible dog owner hoping to retain my ability to allow my dog to thrive, off lease, at Crissy Field. As with most complex issues, compromise seems the logical approach. At Crissy Field, dogs on leash on the path and East Beach so families and joggers are unmolested by off-lease dogs. On the West Beach, allow dogs off-lease to romp and play and give and experience joy. This is not too much to ask.

Corr. ID: 6131 **Organization:** *Not Specified* **Comment ID:** 365531 **Organization Type:** Unaffiliated Individual
Representative Quote: Limiting the central beach at Crissy for off leash use is unacceptable. This is an established and well used off leash area. To provide for a consistent use of the area, some of Crissy could be off-leash, but no areas should be prohibited. Limiting only a portion of the airfield for a ROLA is also unacceptable. The entire airfield is entirely underutilized to begin with. Delineation of the ROLA and leash required areas would be difficult, and I oppose fences to surround or delineate any off-leash area in the GGNRA.

Response: The VSCA in the middle portion of the airfield has been extended to the east to allow more area for voice and sight control dogwalking; and, the Central beach west of the pedestrian bridge would also be a VSCA. These will be signed and demarcated. Additional VSCAs, beyond Central Beach and the eastern portion of the Airfield, would not be established at Crissy Field given its multiple visitor uses and park resources. Marina Green is not within NPS lands, but instead the City and County of San Francisco. Fencing would be installed and maintained along the dunes at Crissy Field and at the eastern and western edges of the VSCA on Central Beach. Please see chapter 2, Preferred Alternative for Crissy Field for additional rationale.

CONCERN STATEMENT: (Concern ID: 53224) ROLAs - Commenters suggested ROLAs should be eliminated or reduced in size, with barriers, in the following areas: East Beach, eastern airfield, western airfield, and main airfield, in part due to their proximity to the wildlife protection area, picnic areas, the Warming Hut, and other user areas. Non-dog owners should not have to cross areas where dogs are allowed for access.

Representative Quote(s):

Corr. ID: 3321 **Organization:** *Not Specified* **Comment ID:** 358145 **Organization Type:** Unaffiliated Individual
Representative Quote: Even though Alternative F prohibits dogs in the wildlife protection area it allows dogs, in some cases totally off leash, into areas adjacent to, and used by resident, migrating and vagrant birds. It also allows dogs onto beach areas where the potential for future interaction with marine mammals is high. ROLAs in the airfield area are too close to protected areas, and the airfield has already hosted a number of migrant and rare vagrant bird species that would be impacted by the numbers of dogs and owners drawn to designated ROLAs in that area. I would urge you to consider more restrictions on dogs at Crissy Field including the elimination of ROLAs along the main airfield.

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 387544 **Organization Type:** Unaffiliated Individual

Representative Quote: Crissy Airfield - The Crissy airfield attracts a wide variety of grassland bird species, including rare vagrants, and is a popular venue for wildlife viewing. This fact is not adequately represented in the SEIS. The eastern portion of the airfield, in its proximity to the Crissy lagoon, is the most environmentally sensitive portion of the airfield. Establishing a ROLA on the eastern portion of the airfield will create a greater potential for conflict between dog walking activities and wildlife, wildlife viewing, and visitor experience.

We prefer to have no off-leash dogs on the airfield. However, if a section is to be chosen as a ROLA, off-leash activity in the central portion of the airfield would have the least impact on wildlife and those engaged in wildlife viewing. Any ROLA should be fully enclosed with, at a minimum, post-and-cable fencing and clear signage.

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 402226 **Organization Type:** Unaffiliated Individual
Representative Quote: Please modify the Crissy Field component of Alternative D and F to eliminate each alternative's ROLA, or at least limit the ROLA to solely the eastern portion of the airfield (area east of the easternmost north/south path). And make the western portion of the airfield a location where visitors will have the opportunity to experience a grassy section of Crissy Field without the presence of dogs

Corr. ID: 6639 **Organization:** *Not Specified* **Comment ID:** 368125 **Organization Type:** Unaffiliated Individual
Representative Quote: Crissy Field: There is no map which is adequate. All examples are blatant examples of giving into the screaming of dog owners who currently believe that they own this prime location which is always crowded with residents and visitors.

Map 10 D can be adjusted. As currently shown...

- . . . The designated dog area does not have hard barriers defining that space ' a mistake. The off-sand (inland) dog area crosses walkways and people must walk through the dogdominated area and become secondary to dog behavior ' a mistake.
- The sandy beach area where unleashed dog may access the water's edge makes a right-hand turn to allow dogs to run along the long stretch of water's edge in front of where people may access the water ' a very big mistake.
- If dogs are allowed to be at and in the Bay water, it must be only directly in front of and only as wide as the off-sand designated un-leashed dog area. A dog space must not be anywhere close to the Tidal Marsh as the smell and barking of dogs is threatening to birds.
- This Dogs Off-Leashes Area is far too large. It must be reduced in size and situated between walkways so that others never have to walk through it or be forced to take longer walkway detours to go around it.
- IF any waterfront access is allowed, it must be DIRECTLY IN FRONT OF and NO WIDER or longer than the inland area. It must be apparent where dogs would naturally be confined and intuitive that people would not want to wander into it with the use of natural barriers and signs.
- Any dog space must always be away from picnic tables, food and grills, the Warming Hut, and where people are entering or exiting vehicles in parking areas.
- Remember: Dogs are NOT the primary users or interest in our public play spaces.

Response: Additional no dog areas have been added to the preferred alternative in the final plan/EIS. East Beach, the Wildlife Protection Area (WPA), the West Bluff picnic area, and the westernmost portion of the airfield would be closed to both on-leash and off-leash dog walking. To further protect vegetation and wildlife within the WPA, a fence would be installed and maintained on the western and eastern edges of the VSCA on Central Beach. VSCAs will be demarcated and separated through landscape design solutions (including fencing where appropriate) that do not impede wildlife movement while separating off-leash areas from adjacent use areas. Buffer zones, demarcations and on-leash managed dog walking will create safer access in traversing these dog walking areas. Please see chapter 2, Preferred Alternative for Crissy Field for more information.

CONCERN STATEMENT: (Concern ID: 53225) Commenters suggested improvements to the parking lot near Middle Beach and the east end of the airfield including expansion of the parking lot, and the addition of safety features such as stop signs and crosswalks. Commenters also suggested the installation of bathrooms, showers, and water spigots near the airfield and tidal marsh to serve those visitors with dogs.

Representative Quote(s):

Corr. ID: 6410 **Organization:** Not Specified **Comment ID:** 366972 **Organization Type:** Unaffiliated Individual

Representative Quote: Another improvement to the Crissy Field Preferred Alternative I believe is vital is the installation of bathroom facilities and showers/water spigots near the border of the airfield and the tidal marsh. The East Beach has bathrooms both near the parking lot and in the Crissy Field Center. There is also easy access to water for hosing off dogs or children. The closest bathrooms for the Central Beach area are in the Warming Hut, which is both a great distance away from the proposed off-leash dog area and on the other side of a dog-restricted region of the beach. If the GGNRA demands that visitors to Crissy Field accompanied by dogs confine themselves to a particular section of the parklands, it is only fair to provide this segment of park patrons with the same level of access to facilities as other patrons.

Corr. ID: 6410 **Organization:** Not Specified **Comment ID:** 366971 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe there are several outstanding issues with the Preferred Alternative at Crissy Field that must be rectified before that option could represent a legitimate plan. If all visitors to Crissy Field that are accompanied by dogs, a number I estimate to be about half of all the visitors, are to be concentrated on the east end of the airfield and the Central Beach area, then improvements to the parking in that area need to be made. The parking lot near East Beach provides 400 spaces of free parking available seven days a week. The parking nearest to the proposed off-leash dog area consists of roughly 30 free-parking spots behind Sports Basement and street parking for a fee along Mason Street with fees enforced seven days a week. This strikes me as grossly unbalanced and unfair. Also, in contrast to the situation at the East beach parking lot, visitors parking in the central area of Crissy Field need to cross Mason Street to access the GGNRA lands. Additional pedestrian safety measures such as a crosswalk or stop sign accessing the airfield are needed to protect the influx of park visitors redirected to this area. Parking near the proposed off-leash dog area will become an even more pressing issue once the Presidio Trust settles on a development plan for the site currently occupied by Sports Basement. If this area becomes a citywide cultural destination, the volume of people visiting the Mid-Crissy Field area will increase even more dramatically, making parking virtually impossible without an equivalent increase in available

spots.

Response: NPS will evaluate if additional safety features and amenities are needed, including crosswalks from Crissy Field parking lots as funding becomes available in its next round of Crissy field planning. Dogs are prohibited from public buildings, which includes restrooms and showers. East Beach, though, already has both a water spigot, as part of a joint venture with Crissy Dog group, and showers for visitors. No other water features are currently planned, recognizing we are in drought conditions; this may also occasionally result in these water features near East Beach parking being turned off.

CONCERN STATEMENT: (Concern ID: 53226) No Dog Areas - Commenters suggested that opportunities for a no dog experience should be increased and established in the following areas at Crissy Field: the entire site, western portion of airfield ROLA, the Promenade, east of the lagoon (the Freshwater Swale), all beaches, and all trails. A ROLA should not be sited next to the Wildlife Protection Area since NPS has noted that dogs get into that area now.

Representative Quote(s):

Corr. ID: 311 **Organization:** *Not Specified* **Comment ID:** 350560 **Organization Type:** Unaffiliated Individual

Representative Quote: Crissy Field should have no off leash area, dogs should be banned from Crissy. People use it. Dogs attack joggers and walkers and I have seen the result of dog of attacks there- - even when the dog is on leash

Corr. ID: 4007 **Organization:** Ca Native Plant Society **Comment ID:** 359580 **Organization Type:** Unaffiliated Individual

Representative Quote: Marin Headlands and Crissy Field shd not allow dogs on or off leash on trails and beaches in these areas to protect plants, wildlife and people; allowing them the freedom of some protected space.

With protecting these areas you have welcomed the return of many wild visitors that shd not be disrupted from their feeding on migration by frolicking dogs and their owners. Dogs roam everywhere these days lets save some space where we are free from the effects of there presence.

Corr. ID: 5093 **Organization:** *Not Specified* **Comment ID:** 362170 **Organization Type:** Unaffiliated Individual

Representative Quote: Walker along Crissy Field trail must be reserved for walker only - No Dogs.

The sandy beach, next to the main parking lot must require that all dogs be on leash.

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 387545 **Organization Type:** Unaffiliated Individual

Representative Quote: Crissy East of the Lagoon - The Freshwater Swale should be designated as a no dog zone

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 366945 **Organization Type:** Unaffiliated Individual

Representative Quote: don't understand why, in the Environmentally Preferable Alternative (Alternative D) for Crissy Field, the NPS would locate a ROLA adjacent to the WPA, or in the NPS Preferred Alternative (Alternative F), the NPS would locate a ROLA adjacent to the Tidal Marsh and along Central Beach. As noted in the SEIS, "the park has installed fencing to restrict access by dogs and people to Crissy Field Tidal Marsh, and signage has been installed to educate visitors on the access restrictions." Yet, this has not been effective enough and "dogs gain access to the marsh through the tidal channel under the pedestrian bridge, and have been observed by park staff in the tidal marsh." Again, "NPS Management Policies 2006 require that NPS 'ensure that conservation will be predominant when there is a conflict between the protection of resources and their use.' A ROLA is inappropriate in areas where there is core habitat, including habitat for listed species and habitat, which can be harmed by off-leash dogs."

Response: Additional dog free areas have been added to the preferred alternative in the final plan/EIS. East Beach, the Wildlife Protection Area (WPA), the West Bluff picnic area and the westernmost portion of the airfield would be closed to both on-leash and off-leash dog walking. In addition, all permitted dog walking of 4-6 dogs will be eliminated from all Crissy field picnic areas and the Crissy Field Promenade (except to directly access the Central beach from East beach parking or to directly access the Central beach from the Crissy airfield). To further protect vegetation and wildlife within the WPA, a wider buffer and fencing will be installed and maintained on the western and eastern edges of the VSCA on the Central Beach. Please see chapter 2, Preferred Alternative for Crissy Field for more information.

CONCERN STATEMENT: (Concern ID: 53227) On-Leash Areas - Commenters suggested establishing only on-leash dog walking areas on all beaches at Crissy Field.

Representative Quote(s):

Corr. ID: 4514 **Organization:** *Not Specified* **Comment ID:** 360465 **Organization Type:** Unaffiliated Individual

Representative Quote: I support the NPS preferred plan as a good compromise. However, in Crissy Field beaches I'd like to see more restrictions and would only allow dogs on leash.

Response: Dog walking would not be allowed on East Beach, the Wildlife Protection Area, the West Bluff picnic area or in the westernmost portion of the airfield. On-leash dog walking would be allowed on the Promenade when walking 1-3 dogs, and also allowed on the eastern section of the Airfield, on the trails and grassy areas south of East Beach, in parking lots and the East beach picnic area. Voice and sight control would continue to be allowed on Central Beach and the central portion of the airfield VSCA to accommodate multiple visitor uses at the site. Please see chapter 2, Preferred Alternative for Crissy Field for rationale for on-leash dog walking areas.

CONCERN STATEMENT: (Concern ID: 53228) Fencing - Commenters suggested fencing the following areas within Crissy Field: airfield ROLA, central beach ROLA, lagoon outlet zone, and wildlife protection area. Fences at the west and east ends of the wildlife protection area should include an adequate buffer zone and should extend to the water at extreme low tide. A permit to enter fenced areas was also suggested.

Representative Quote(s):

Corr. ID: 367 **Organization:** *Not Specified* **Comment ID:** 351269 **Organization Type:** Unaffiliated Individual

Representative Quote: In my view, the conclusions are outrageously slanted in favor of dogs and dog owners. Crissy Field is a heavily used urban park, closest to the largest concentration of the public. It naturally should favor use by pedestrians, who include small children, the elderly, disabled people. Your plan continues to put us at risk. I am outraged that dogs will be allowed in all areas and off-leash in some. The most sensible solution is to fence off a portion of the field for use by dogs. Crissy Field should have as its priority the enjoyment and safety of people not the absolute freedom of dogs.

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 366106 **Organization Type:** Unaffiliated Individual

Representative Quote: Crissy Central Beach - The Central Beach ROLA should be fenced and gated. Fences at the west and east ends should extend to the water at extreme low tide. Adequate buffer zones (~300ft) should be included beyond the west and east boundary fences to protect the WPA and the lagoon outlet from the influences of excessive dog play activity. Access points from the promenade should be gated. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Crissy East Beach - Fencing should be installed to protect the lagoon outlet zone. Outlet areas from bodies of water into bays or oceans are of high habitat value. The outlet zone should be included as part of the protected lagoon area and similarly fenced.

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 366105 **Organization Type:** Unaffiliated Individual

Representative Quote: Crissy Field WPA - The language of the plan should allow the National Park Service flexibility in determining the exact location of the fence and consideration should be given to the visual penetration effect as well as the geographical conditions of the immediate area.

Under the Preferred Alternative, off-leash dog activity directly adjacent to the east boundary fence will pose a visual threat that will penetrate into the Wildlife Protection Area, effectively rendering a portion of the eastern WPA as non-viable habitat during daytime use hours. Given this concern, the fence should be placed a reasonable distance eastward, beyond the actual 900-foot border line, to allow for an adequate buffer zone.

Additionally, the geography of the ROLA fence placement is somewhat complicated by non-uniform conditions which include a variety of substrates, varying elevations, several lobes of fenced dune habitat areas, and a variety of pedestrian pathways. Consideration should be given to all of these conditions and fence placement should accommodate ease of pedestrian traffic flow while maintaining adequate protection of the WPA.

When installed, the fence should extend to the water at extreme low tide.

Response: Landscape design solutions will be used to demarcate areas on the central airfield including fencing that would not impede wildlife movement nor affect the national historic landmark. The central beach area will be fenced on both sides to at least the extreme, low-tide water mark with a buffer to protect adjoining wildlife species in the WPA and the tidal outlet and spit.

CONCERN STATEMENT: (Concern ID: 53229) Crissy Field Use Restrictions - Various dog management techniques at Crissy Field were suggested including:

- During busy hours ROLAs should be restricted to Middle Beach and Airfield
- 2 dog limit on East Beach
- Parking for dog owners restricted to Warming Hut parking lot
- Soft restrictions could ask, but not require, dog owners to restrict their use of areas during busy times.

Representative Quote(s):

Corr. ID: 6025 **Organization:** Not Specified **Comment ID:** 364978 **Organization Type:** Unaffiliated Individual

Representative Quote: Chrissey Field has more dog walkers now. Most have a minimum of six dogs. They arrive around nine thirty. I believe very few people can control six to ten dogs off leash. Many of the dog walkers visit in the East Beach area and are not watching their dogs closely.. I believe that there should be a two dog limit at the East Beach so that residents can bring their children and dog. Dog walkers should have to park by the warming hut since there are fewer people and children in that area.

Corr. ID: 6305 **Organization:** Not Specified **Comment ID:** 365457 **Organization Type:** Unaffiliated Individual

Representative Quote: Additional signage could be put up to ask dog owners and walkers to restrict their off leash usage on weekends during busy times. At Crissy, signage could be effectively used to recommend that off leash recreation at busy times (mid day/ afternoon on weekends) be restricted to Middle Beach or the Airfield. Most owners and walkers avoid very busy areas, bicyclists, etc. and have their dogs on leash during these times. During the week, early and late on weekends, these restrictions are not necessary as there is not a conflict.

Response: VSCAs would be restricted to Central Beach and the middle portion of the airfield. NPS evaluated time of use restrictions, but felt it important to maintain at least one beach area at Crissy Field dog-free. Maintaining a beach area that is no dogs provides a clean and safe area for families while protecting wildlife in the tidal outlet and spit. Time of use restrictions can be difficult to enforce and confusing to park visitors. Time of use has also been suggested for times when visitor numbers are low (early am or late pm), but these are generally the times when wildlife numbers are higher. Time of use is being used as a permit condition because permits can be more specifically managed and restricted if permit conditions are not met. This management concept and tool, though, will remain an option for dog management in future decision-making, including as an optional management response through the monitoring management program. Please see chapter 2, National Park Service Preferred Alternative and Alternative Elements Eliminated from Further Consideration for additional rationale for time of use restrictions.

NPS has limited dogs to no more than 3 without a permit for all areas addressed by the dog management plan. Adjacent jurisdictions also limit dog walking, but none to only 2 dogs. Parking lots will not be restricted by type of use, as this is difficult to enforce; however, parking lots are on-leash only.

CR2010 - Cultural Resources: Affected Environment

CS1400 - Cattle/Sweeney: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53230) Commenters would like off-leash opportunities at Sweeney Ridge/Cattle Hill. Suggested ROLA areas include Baquiano Trail and Sneath Lane.

Representative Quote(s):

Corr. ID: 185 **Organization:** Not Specified **Comment ID:** 350001 **Organization Type:** Unaffiliated Individual

Representative Quote: Currently, the Cattle Hill section is a de facto off-leash region that is enjoyed as such by many local residents. Would the NPS consider a revised version of Map 19-F that acknowledged the current usage by making at least the Baquiano Trail portion of Cattle Hill off leash?

Corr. ID: 275 **Organization:** Not Specified **Comment ID:** 350452 **Organization Type:** Unaffiliated Individual

Representative Quote: We also love hiking Sweeny Ridge from Sneath Road with our dogs, even though they need to be on leash. We wish that they were allowed off leash, since there is no danger of them disappearing away from the

trail, (as it is bordered sharply.) We really rely on that hike as a way to replenish ourselves mentally and physically, with our dogs.

Response: VSCAs on trails and fire roads was considered but dismissed for all action alternatives in the final plan/EIS, with the exception of a portion of the Oakwood Valley Fire Road, an area of consensus from the Negotiated Rulemaking, and a small area within Ft. Funston. VSCAs would not be established on trails at Sweeney Ridge or Cattle Hill due to safety concerns, sensitive habitat and protection of core habitat. However, two trails would be made available for on-leash dog walking at Sweeney Ridge in order to provide this visitor use while still protecting natural resources. Please see chapter 2, Preferred Alternative for Sweeney Ridge/Cattle Hill for additional rationale.

CONCERN STATEMENT: (Concern ID: 53231) Commenters are opposed to changes to trail access that would segregate the trails from neighboring communities. On leash should be allowed within Sweeney Ridge and Cattle Hill, including the Notch Trail.

Representative Quote(s):

Corr. ID: 535 **Organization:** Not Specified **Comment ID:** 351879 **Organization Type:** Unaffiliated Individual

Representative Quote: Problems with the proposed Sweeney Ridge/Cattle Hill revision:

-cuts off trail access from all of Vallemar

-forces people in Vallemar to get in a car and drive a really long way around the Vallemar Hill range just to walk their dogs for a couple of hours.

Corr. ID: 1682 **Organization:** Not Specified **Comment ID:** 353563 **Organization Type:** Unaffiliated Individual

Representative Quote: The proposal for trails allowing leashed dogs in the Cattle Hill/Sweeney Ridge area is egregiously unacceptable. I strongly object to having to drive to San Bruno in order to hike to the Discovery Site with my dog. Portola came from the western side to first see the Bay and we should be able to make that same trek with our leashed dogs. I did not find any convincing evidence that leashed dogs on any of the trails in the Sweeney Ridge area would present a problem. Leashed dogs should be allowed on all these trails, including the Notch Trail. If horses are allowed, why not leashed dogs?. Most of the trails in the Sweeney Ridge area offer panoramic views and are more like roads than narrow trails. Dogs should not be excluded just on the off chance that someone will be on the trail who is afraid of dogs.

Response: Dogs are currently not allowed on the Notch Trail, a highly-sensitive resource trail corridor; therefore no changes to use on this trail would occur. NPS evaluated the Mori Ridge Trail and Baquiano Trail for on-leash dog walking. However, the Baquiano Trail contains Mission blue butterfly habitat along the trail that could be impacted from on-leash dog walking. The Mori Ridge Trail is a fractured fire road that intersects with the Notch Trail. Concerns with the Mori Ridge trail include mission blue butterfly habitat along its edges, its intersection and access point to the even more sensitive Notch trail, and difficulties for enforcement. In addition, this area includes important contiguous habitat for native plant species and large mammals with the other adjacent public lands. These trails are not being segregated from these neighboring communities for their recreational trail use; dog walking is being restricted on these trails due to its potential impacts on park resources, and to provide areas that are dog free.

CONCERN STATEMENT: (Concern ID: 53232) Commenters prefer alternative A for the Sweeney Ridge/Cattle Hill with the addition of all of the Baquiano trail from the trailhead at Fassler Ave. in Pacifica to its conclusion at the Portola Discovery site. Commenters do not support the preferred alternative for Sweeney Ridge/Cattle Hill, which does not promote interconnectedness of the Sweeney Ridge Trail system.

Representative Quote(s):

Corr. ID: 6176 **Organization:** Not Specified **Comment ID:** 365753 **Organization Type:** Unaffiliated Individual

Representative Quote: Sweeney Ridge/Cattle Hill

I support GGNRA Draft Dog Management Plan's Alternative A with the addition of the Baquiano Trail from the trailhead at Fassler Ave. in Pacifica. The adoption of Alternative A with the mentioned additions would allow continued multi use (including on-leash dog walking) throughout the Sweeney Ridge trail system.

I do not support the current preferred alternative 19-F due to:

Lack of interconnect-ability of all of the Sweeney Ridge Trail System. Many users of Sweeney Ridge live locally and access the trail system from three very different geographical trail access points.

Over stating of damage caused by on-leash dog walking given the historical use of the area which once was an active military site. Most trails are existing 4x4 vehicle roads at least eight feet wide-if a dog is leashed it will not impact

sensitive habitat areas. Currently a gas, water and electrical right of way. Mountain biking and horse riding are permitted on Sweeney Ridge. These activities are just as destructive if not more so to sensitive habit areas and species.

No attempt to protect sensitive areas with signage or fencing.

Visitor use of Sweeney Ridge is relatively low compared to other GGNRA areas, making visitor and on-leash dog contacts very minimal.

Consideration for ADA accessibility. 19-F would exclude the least steep, only switch backed trail into the Sweeney Ridge Trail System.

Impact on other local parks. The San Mateo County Parks Department has a no pet policy making the GGNRA the only legal place to walk our dog in a rural park setting.

Sweeney Ridge is surrounded by urban areas with direct access from many neighborhoods making the wilderness back country experience unattainable.

Is enforcement realistic? I would rather have consistent on-leash enforcement rather than unregulated off-leash due to difficulty of enforcement.

Failure of EIS to show specific scientific damage resulting from on-leash dog walking.

Many rare and endangered species and plants have thrived and not adversely been effected by on-leash dog walking.

Response: VSCAs on trails and fire roads was considered but dismissed for all action alternatives in the final plan/EIS, with the exception of a portion of the Oakwood Valley Fire Road, an area of consensus from the Negotiated Rulemaking, and a small area within Ft. Funston. VSCAs would not be established on trails at Sweeney Ridge or Cattle Hill due to safety concerns, sensitive habitat and protection of core habitat. However, two trails would be made available for on-leash dog walking at Sweeney Ridge in order to allow dog walking while still protecting natural resources. Please see chapter 2, Preferred Alternative for Sweeney Ridge/Cattle Hill for additional rationale. NPS evaluated the Mori Ridge Trail and Baquiano Trail for on-leash dog walking. However, the Baquiano Trail contains mission blue butterfly habitat along the trail that could be impacted from on-leash dog walking. The Mori Ridge Trail is a fractured fire road that intersects with the Notch Trail, a highly-sensitive resource trail corridor. Concerns with the Mori Ridge trail include mission blue butterfly habitat along its edges, its intersection with an even more sensitive trail, the Notch trail where dog walking has been prohibited previously, and difficulties for law enforcement. In addition, this area includes important contiguous habitat for native plant species and large mammals with the other adjacent public lands.

CONCERN STATEMENT: (Concern ID: 53233) Many commenters would like additional areas opened to dog walking including Baquiano Trail, the trails around Shelldance Nursery, and the trail east of the Sundance Nursery.

Representative Quote(s):

Corr. ID: 2170 Organization: Not Specified Comment ID: 356093 Organization Type: Unaffiliated Individual

Representative Quote: I also want to make a point about the detailed differences among trails on the Sweeney Ridge land. The trail east of the Sundance Nursery is VERY steep with crumbling footing. Hiking up from the end of Fassler Avenue is much better, especially with the new trail. Quality of walking makes a difference, so decisions should not be made simply looking at a map. Decision makers need to actually walk the trails and experience the terrain. In this case I see no reason why both these trails should not be open to leashed dogs.

Corr. ID: 5252 Organization: Not Specified Comment ID: 362816 Organization Type: Unaffiliated Individual

Representative Quote: The trail by the Shelldance nursery (Sweeney Ridge) ought to be considered for on leash access as well. San Bruno seems to have a lot of trailhead access for dogs, while Pacifica has very little.

Response: NPS evaluated the Mori Ridge Trail and Baquiano Trail for on-leash dog walking. However, the Baquiano Trail contains mission blue butterfly habitat along the trail that could be impacted from on-leash dog walking. The Mori Ridge Trail is a fractured fire road that intersects with the Notch Trail, a highly-sensitive resource trail corridor. Concerns with the Mori Ridge trail include mission blue butterfly habitat along its edges, its intersection with an even more sensitive trail, the Notch trail where dog walking has been prohibited previously, and difficulties for law enforcement. In addition, this area includes important contiguous habitat for native plant species and large mammals with the other adjacent public lands.

EJ2010 - Environmental Justice: Affected Environment

CONCERN STATEMENT: (Concern ID: 53314) Commenters noted that there are a wide range of ages, ethnicities, and economic classes that visit the Golden Gate National Recreation Area to walk dogs. These commenters feel that NPS misrepresented some groups' feelings towards dogs by stating they avoid dogs or are afraid of them. Conversely, one commenter stated that elderly people currently avoid Golden Gate National Recreation Area because of the presence of the dogs.

Representative Quote(s):

Corr. ID: 5224 Organization: Not Specified Comment ID: 362695 Organization Type: Unaffiliated Individual

Representative Quote: Off-leash recreation is currently enjoyed by a diversity of people, e.g. young & old, rich and poor, able-bodied and differently-abled. Additionally, unlike many other GGNRA/NPS activities, dog walkers include many people of color. Spend weekend at Fort Funston and you'll see a wide variety of folks. One might contrast this to the demographic of some other outdoor recreational activities. (Do not count student "volunteers" who are in weeding the park for community service credits.) Although some opponents of off-leash dog walking will say "seniors & children & various ethnicities, etc. are afraid/avoid dogs," note there are hundreds of seniors & children and people of color who LIKE off-leash dogs.

Corr. ID: 6204 Organization: Not Specified Comment ID: 366007 Organization Type: Unaffiliated Individual

Representative Quote: Many older people now avoid parks and the GGNRA because of all of the dogs, mostly off leash. Even on-leash dogs can jump on a person, especially when they are walked on the long expandable leashes. I think that you need to specify a maximum leash length of 6 feet. I get tired of having leashes wrap around my legs and that entrapment is also dangerous.

Response: NPS stands by both the Roberts study and the 2002 NAU survey; chapter 4 of the EIS also states that "Without further information on visitation by minorities and low-income individuals and their preferences regarding off-leash dogs in the park, it is difficult to assess the impacts (adverse and beneficial) on this user group. Therefore, minorities and low-income individuals will be assumed to fall under one or more of the user groups (visitors who would prefer to walk dogs on GGNRA lands, visitors who would prefer not to have dog walking on GGNRA lands, and visitors who do not have a preference regarding dog walking in GGNRA) developed for assessing impacts to visitor use and experience." NPS also finds public comments disclosing personal experiences, whether for or against the plan, to be important pieces of information to consider.

CONCERN STATEMENT: (Concern ID: 53315) The 2002 phone survey and the NPS visitor survey both show general support of off-leash dog walking regardless of race. Commenters feel that the use of the survey data is contradictory and doesn't support the management plan.

Representative Quote(s):

Corr. ID: 5227 Organization: Not Specified Comment ID: 362709 Organization Type: Unaffiliated Individual

Representative Quote: The NPS cites Environmental Justice as a reason for implementing the Plan, but the survey data presented by the NPS indicates that this rationale is not based in fact. Within the flawed 2002 phone survey, African-Americans, Asians, Caucasians, and Hispanics all show the same general support for off-leash walking (37-44%, African-Americans showing the most support). A separate NPS visitor survey cited later in the report shows no measurable difference in the opinion between Caucasians and Asians on dogs, and no issues cited by Black/African Americans:

Corr. ID: 6716 Organization: San Francisco Dog Owners Group Comment ID: 499766 Organization Type: Unaffiliated Individual

Representative Quote: THE SEIS CONTINUES TO MISREPRESENT A SF STATE STUDY ABOUT ENVIRONMENTAL JUSTICE

On p. 330, the SEIS says about the Roberts 2007 study: "While not all participants were familiar with the GGNRA, a common theme was identified, as related to dog management in the park: dogs were a problem mentioned by Hispanic/Latino and Asian/Pacific Islander groups. Hispanic/Latino people expressed the most concern with dog owners' lack of concern or control

over their dogs. For example, participants in the survey noted that dog owners assume that other people will like the owners' dogs as much as they do; dog owners let their dogs approach other people without first asking their permission; and owners do not react to their dogs begging for other people's food. One participant stated, "Every time we go to

picnic the dogs come and eat our

food, they wander around, and the owners don't do anything. The same with their bowel movements! The owners don't clean after them." Research found that Hispanic/Latino people and Asian/Pacific Islanders mentioned dogs, especially dog waste, as a barrier to park visitation and a constraint to enjoyment of the park."

My criticism of the Roberts study still applies. The Roberts study was a series of focus groups of a small group of non-randomly selected members of various minority groups intended to "realize the park goals of understanding how to improve 'connecting people to the parks' and how best to engage under-represented communities in plans and programs." The focus groups totaled less than 100 people, who were largely unfamiliar with the GGNRA (only 1/3 had visited at least one GGNRA site in the past year). There is nothing in the report to indicate how common a comment was - did only one person say it, or was it mentioned repeatedly. Thus the focus groups' opinions reflect only the opinions of the people who participated and cannot be extended to indicate opinions shared by all members of the minority groups represented. Yet that is what the DEIS does with the Roberts study.

While dogs were mentioned, it is a misrepresentation of the study to claim dogs were a major factor keeping minorities out of the GGNRA. A major concern expressed was that there are not enough minorities represented in NPS staff. Common barriers to coming to the GGNRA included the lack of mass transit to get to the GGNRA, and fear of unknown plants and wildlife behavior. When asked to describe why they think San Francisco parks have become less safe, African Americans in the focus groups expressed concerns about finding used drug paraphernalia on the beaches, the danger of pedophiles/sexual predators at the park, and aggressive panhandling. Asians and Hispanics expressed concerns about cleanliness, defined as unclean bathrooms and dog feces. While Hispanics in the focus group did mention dogs as a constraint to park enjoyment, they also mentioned concern for personal safety, lack of mass transit, and fear of crime (fear of being raped, witnessing drug use, the presence of homeless people, and observing fights - "it is only safe if enough people are around"). Asians similarly mentioned dirty bathrooms and dog feces in the same context as a barrier for access to parks. Two focus groups of Asians reported dislike for "dog owners [who] do not clean up after their pets," but also for trails not being well kept.

Out of the more than 30 recommendations at the end of the study, there is no mention of dogs. While dogs were mentioned in the focus groups, it is by no means the indictment of dogs - if only there were no dogs, Asians and Latinos would visit the GGNRA - that is implied in the SEIS. It is at best anecdotal accounts of a few people's opinions of parks in general, not necessarily the GGNRA, since most had never been to the GGNRA.

Response: Additional studies have been reviewed and incorporated into the Environmental Justice analysis. Please see chapter 3, Visitor Use and Experience, Environmental Justice for additional information.

EJ4000 - Environmental Justice: Impact of Proposal and Alternatives

CONCERN STATEMENT: (Concern ID: 53316) Commenters expressed concern over those people who do not have cars or other means of access to parks outside of the city. Commenters stated that many residents of the city of San Francisco fall into this category, especially the elderly and people with low-income. Many commenters expressed the need for ROLAs for the elderly and disabled who may need to have off leash areas to properly exercise their dogs. Reducing off leash areas would limit the areas where senior citizens and disabled people can exercise with their dogs.

Representative Quote(s):

Corr. ID: 155 Organization: Not Specified Comment ID: 349884 Organization Type: Unaffiliated Individual

Representative Quote: The elimination of major portions of National Park services for off leash dogs, particularly Crissy Field and Fort Funston, severely hampers my ability to keep fit as a senior citizen. Recreation is not about watching my dog run in a small enclosed area. I am 69 years old and walk vigorously at fort funston and crissy field along with my 22 lb schnauzer sally off leash. I can not put her on leash as it throws me off balance. Your new proposal virtually eliminates my ability to recreate and will make me go to local san francisco parks to get my workout. This is unfair to san francisco as we gave the land to you for fort funston and against my health interests as a senior citizen.

Corr. ID: 238 Organization: Not Specified Comment ID: 350168 Organization Type: Unaffiliated Individual

Representative Quote: For many urban dog guardians, especially seniors who find it difficult exercise their pets while on-leash, the GGNRA represents the only place where they can allow their dogs to play, romp around and release a lot of energy. Take away this haven for exercise, and guardians may be unable to meet the physical needs of their pets. Daily exercise, like food and water, is essential to a dog's proper health and well-being.

Corr. ID: 873 **Organization:** *Not Specified* **Comment ID:** 353482 **Organization Type:** Unaffiliated Individual
Representative Quote: As a disabled person with a companion dog, I really value the ability I have to take my dog to places like Chrissy Field and Fort Funston where he can run off leash. I have Spina Bifida and use leg braces and a cane, as a result it is very difficult for me to walk my dog on leash. The loss of access to such places would be a great blow to both of us, and severely limit our options for outdoor recreation in the city. I find it very hard to use the existing enclosed dog parks in the city, as the dogs there tend to be very territorial and aggressive. In the past I have been knocked over by these animals, and so I am forced to sit on a bench. My dog is protective and will then sit beside me and thus not take advantage of being off-leash. This is not a problem that occurs at more open spaces such as Chrissy Field and Fort Funston, where I am able to walk more freely and he can accompany me.

Corr. ID: 3840 **Organization:** *Not Specified* **Comment ID:** 359963 **Organization Type:** Unaffiliated Individual
Representative Quote: This new regulation is going to substantially change the nature of Marin County and the area that so many animal owners cherish and have for so many years. It is too sweeping a change; unfair to so many people who count on those trails and beaches for their own health and exercise and that of their pets. This new regulation would put many people on the road to the few places left, leaving them overcrowded. It would prevent countless older people from going out for a walk with their pets.

Corr. ID: 4596 **Organization:** *Not Specified* **Comment ID:** 361120 **Organization Type:** Unaffiliated Individual
Representative Quote: The SEIS also sites that the only off-leash area for all of Marins 60,000 dogs would be a small stretch of Rodeo Beach. That beach is only accessible via car. Right now, many people can walk to their favorite off-leash trail including Oakwood, Miwok, Homestead and others. These federal lands are intertwined with our neighborhoods. Forcing people into their cars to exercise themselves and their dogs is not only horrible for the environment but also hard on the pocketbook. I also think its quite fiendish since the GGNRA has been in the process of downsizing the parking lot at Rodeo Beach and will begin encouraging people to take shuttles therefore making it increasingly impossible for Rodeo to become a full fledge ROLA in the future

Corr. ID: 6681 **Organization:** *Not Specified* **Comment ID:** 368267 **Organization Type:** Unaffiliated Individual
Representative Quote: The proposed ROLO areas described in the SEIS are prejudicial to senior citizens and the disabled. It is very dangerous to attempt to navigate the paths to the beach with a dog on a leash in the event the owner falls/slips. The proposed ROLO areas will deny disabled people the ability to have their dogs off leash as much of the proposed ROLO areas will not be accessible as the dogs will not be within visual range of persons who must stay on the paved paths due to disability.

Response: If funding becomes available, GGNRA would explore options that would allow for easier access for disabled and elderly visitors to VSCAs (formerly known as ROLAs), such as beach mats. At Fort Funston, the park intends to improve Federal Rehabilitation Act access on the Chip Trail with budget authorization in FY17-18. The impact analysis for minority populations has been revised. Please see chapter 4, Visitor Use and Experience, Environmental Justice for additional information.

CONCERN STATEMENT: (Concern ID: 53318) Several commenters are offended by stereotypical statements in the document and feel that an environmental justice analysis is unwarranted as it lumps people into unnecessary categories. However, some commenters suggested that the NPS should incorporate the studies that show a decrease in park use by minorities with the availability of off-leash dog walking areas into the final EIS.

Representative Quote(s):

Corr. ID: 4365 **Organization:** *Not Specified* **Comment ID:** 368823 **Organization Type:** Unaffiliated Individual
Representative Quote: I have carefully read the document provided in support of the proposed policy changes for dog walking in the GGNRA. I was astonished to find a section of the report on "Environmental Justice", and read this section carefully to try and understand the argument being made.

This section presents data suggesting that minorities are especially concerned about the problems associated with off-leash dog walking : "...Research found that these minority groups mentioned dogs, especially dog waste, as a barrier to park visitation, and overall, Latinos were the most concerned with dog owners' lack of concern or control of their dogs (Roberts 2007, iii)."

However, even throughout this section, the data presented frequently contradicts the conclusion offered by the report. For example, "...in the telephone survey conducted by Arizona University's Social Research Laboratory, 39.4 percent of respondents of Hispanic origin supported (strongly and somewhat) off-leash dog walking and 39.9 percent of respondents of non-Hispanic origin supported (strongly and somewhat) off-leash dog walking (NAU 2002b, 93)." Here, there is no detectable difference between the opinions of different groups. Basically, this "evidence" does not support any particular conclusion or policy. Why is this presented? A careful reading of this entire section of the report does not produce any evidence to support the GGNRA presumption that the current policies are "unjust".

Even worse, I find this entire section offensive because of the way it presents stereotypes and racially-biased comments throughout the analysis. Furthermore, I am upset that the NPS would go to this trouble in attempting to manufacture a racial justice argument to support their objective. Is the goal of the NPS to divide and conquer? Is it so important to restrict off-leash dog walking that the NPS would try to divide us along racial lines in order to do so?

Even more so, I was greatly surprised to see that the authors of this report are so intensely focused on presenting evidence to support their chosen conclusion that they would include such an offensive section in the report - ESPECIALLY because the information presented in this section does not even give any direct support for the proposed policy change. The only thing that could possibly be accomplished here is to generate a division along racial lines which could be exploited to justify a policy change. I just find this whole tactic offensive.

Corr. ID: 6678 Organization: Wild Equity Institute **Comment ID: 369613 Organization Type:** Non-Governmental
Representative Quote: Off-leash dogs and dog waste also create barriers for ethnic minorities who want to use the park.

There are already disproportionate rates of general park use between white and ethnic minority users, as GGNRA visitors are still much more likely to be white than city or state residents. 7In addition, recreational opportunities for those with lower incomes have become increasingly more difficult as income inequality rises and income gaps between White citizens and Black and Latino citizens have also continued to increase(8). These economic constraints create even further barriers for ethnic minorities to use public parkland. Although some have argued, as noted in the SEIS, that park use by ethnic minority populations would increase with more available off-leash areas, several reports and studies show the opposite is true. (SEIS pg. 330). A 2007 study conducted by Nina Roberts of San Francisco State University found that Asian and Latino park users consider uncontrolled dogs and dog waste to be a barrier to visiting the Park(9). The Park Service acknowledged those findings in the SEIS; however, the Park Service also cited to a 2002 Northern Arizona University study(10) in an apparent effort to discount or downplay those findings(11). But a review of the 2002 study's relevant data in fact confirms the concerns regarding off-leash dogs discussed in this letter, and the Final EIS must reflect this.

Corr. ID: 6710 Organization: *Not Specified* **Comment ID: 369482 Organization Type:** Unaffiliated Individual
Representative Quote: The issue of Environmental Justice, as it is postulated in the DEIS/SEIS is offensive at best. To claim that ethnic minorities are dissuaded from visiting the park because dogs are present is a perversion of the data. None of the 20 or more recommendations in the study about what the GGNRA could do to increase accessibility by minorities includes banning or restricting dogs.

The study was flawed in that it was a small sample of non-randomly selected people who were largely unfamiliar with the GGNRA (only 1/3 had visited at least one GGNRA site in the past year). This creates a situation where opinions about the GGNRA are obtained from people who have not experienced the GGNRA to any significant degree. It is more likely that the measurements only reflect their perception of the GGNRA, not what actually occurs there. The responses obtained from this study might be well suited to establishing a public relations campaign for the GGNRA, but not establishing park policy. If the GGNRA had complied with their legal requirement to have this "study" peer reviewed, maybe it would have been modified so as to actually produce results that could have been informative.

Response: NPS stands by both the Roberts study and the 2002 NAU survey; chapter 4 of the EIS also states that "Without further information on visitation by minorities and low-income individuals and their preferences regarding off-leash dogs in the park, it is difficult to assess the impacts (adverse and beneficial) on this user group. Therefore, minorities and low-income individuals will be assumed to fall under one or more of the user groups (visitors who would prefer to walk dogs on GGNRA lands, visitors who would prefer not to have dog walking on GGNRA lands, and visitors who do not have a preference

regarding dog walking in GGNRA) developed for assessing impacts to visitor use and experience.”

FB1400 - Fort Baker: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53234) Commenters would prefer to have some areas of Fort Baker other than the beach that are off limits to dogs, especially on unpaved trails. One commenter feels that Drown Fire Road should be closed to dogs due to the presence of Mission Blue butterfly habitat.

Representative Quote(s):

Corr. ID: 6323 **Organization:** Marin Audubon Society **Comment ID:** 365573 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Baker

Leashed dogs would be allowed basically everywhere except the beach area. We think there should be some trails, other than the beach, in this area where dogs are not allowed. It is important that dogs not be allowed on the beach to better ensure protection of the lagoon waters for aquatic birds.

We continue to support our previous recommendation: to allow on Bay Trail and other paved roads/trails, but not on unpaved trails.

Corr. ID: 6459 **Organization:** San Francisco League of Conservation Voters **Comment ID:** 368537 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Baker - We generally support the preferred alternative, with the exception of Drown Fire Road. We believe the mission blue butterfly habitat should not be subjected to sacrifice for personal recreation. This also prevents visitors staying at the conference center from enjoying a nearby dog-free hiking experience in nature.

Response: The Battery Yates Trail and Drown Fire Road would be available for a no dog experience. This preferred alternative would provide protection of the mission blue butterfly habitat and other natural resources along these trail edge areas. The new Vista Point trail would also provide an unpaved trail experience at Fort Baker without dogs. Please see chapter 2, Preferred Alternative for Fort Baker for additional rationale.

CONCERN STATEMENT: (Concern ID: 53235) Commenters suggest that a ROLA be established on the northern section of East Road as well as a segment of the Drown Fire Road.

Representative Quote(s):

Corr. ID: 6683 **Organization:** Marin Humane Society **Comment ID:** 369607 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Baker- We recommend the current status of this site be maintained and we support Alternative A. We would like to see segments of voice control on the northern section of East Road as well as a segment of the Drown Fire Road. Many residents of Sausalito can easily access this area on connecting trails. There is a need to be consistent with neighboring regulations in this area.

Response: VSCAs on trails and fire roads was considered but dismissed for all action alternatives in the final plan/EIS, with the exception of a portion of the Oakwood Valley Fire Road, an area of consensus from the Negotiated Rulemaking, and a small area within Ft. Funston. Further information can be found in chapter 2, Alternative Elements Eliminated from Further Consideration. Allowing off-leash dog walking along the Drown Fire Road would not be suitable, as this area contains mission blue butterfly habitat. Allowing off-leash dog walking on the East Road presents safety concerns. Please see chapter 2 of the final plan/EIS for additional rationale.

FF1400 - Fort Funston: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53236) ROLAs - Commenters suggested increasing the number of ROLAs within Fort Funston at the following locations: the entire site, Environmental Science Center, main hang gliding area, South Funston Beach Trail (sand ladder), Sunset Trail, social trail that goes through the bushes next to the parking area near the admin buildings, and the upland paved pedestrian pathway. In addition, commenters suggested increasing the size of the upland ROLA.

Representative Quote(s):

Corr. ID: 336 **Organization:** Not Specified **Comment ID:** 350613 **Organization Type:** Unaffiliated Individual

Representative Quote: Ft. Fun - area by Environ Sci Center is where older dogs often go to have an off-leash, calmer

frolic. Very important for area bet Sci Center main hang glider area to remain off leash for fewer dogs experience

Corr. ID: 447 Organization: Not Specified Comment ID: 351384 Organization Type: Unaffiliated Individual
Representative Quote: Still too limited for off leash at Fort Funston. Fort Funston is heaven on earth for dog people and their dogs. Alternative F gives no direct off leash access from parking lot next to admin buildings. If forces us to go up and around with dogs on leash to the Funston Beach Trail (south) There is a social trail that goes by bushes that could be FORMALIZED as an actual new trail "ROLA"! I go down to the beach below the olympic club, because ladder trail dangerous

Corr. ID: 524 Organization: Not Specified Comment ID: 351864 Organization Type: Unaffiliated Individual
Representative Quote: Fort Funston - sunset trail should remain off leash as it is now

Corr. ID: 2220 Organization: Not Specified Comment ID: 356821 Organization Type: Unaffiliated Individual
Representative Quote: Fort Funston should remain completely off-leash

Corr. ID: 4816 Organization: Not Specified Comment ID: 361584 Organization Type: Unaffiliated Individual
Representative Quote: After studying the Fort Funston ROLA proposals it seems clear that no dog behaviorists were included as DEIS advisors, because neither the on or off-leash areas have any shade!!! Also, as a senior, Id risk injury trying to get Penny to the beach (which as you know is often unusable because of high tides or bad weather) on-leash, and because the trails would be crowded Penny would be anxious, esp. on-leash, and more likely to be aggressive (evincing possible leash rage). The ROLA proposed next to the parking lot is completely inadequate for the number of dogs using Fort Fun and is an invitation to non-compliance which under the current proposal would eventually result in dogs being banned entirely.

Corr. ID: 5627 Organization: Not Specified Comment ID: 364028 Organization Type: Unaffiliated Individual
Representative Quote: Most important regarding Fort Funston, it is imperative that any revision allow off-leash dog walking under voice control on the uplands paved pedestrian pathway. The vast majority of visitors stay on this path, and many are elderly or handicapped, preventing them from leaving the pavement.

Corr. ID: 6391 Organization: Not Specified Comment ID: 366077 Organization Type: Unaffiliated Individual
Representative Quote: At Fort Funston, the sand ladder should be off-leash and more fencing and enforcement should be provided.

Response: NPS provided additional VSCA areas in the draft plan/SEIS in response to public comments. The VSCA was enlarged in the preferred alternative and included the beach access trail. The preferred alternative would provide multiple visitor experiences and protection of natural and cultural resources. Off-leash dog walking on trails and fire roads was considered but dismissed in the final plan/EIS. Please see chapter 2, Preferred Alternative for Fort Funston, and Alternative Elements Eliminated from Further Consideration for further rationale.

CONCERN STATEMENT: (Concern ID: 53237) Commenters suggested the following areas within Fort Funston should require dog walking to be on-leash: inland ROLA, area next to parking lot, and trails that do not have fencing.

Representative Quote(s):

Corr. ID: 6639 Organization: Not Specified Comment ID: 368126 Organization Type: Unaffiliated Individual
Representative Quote: Ft. Funston and all other Headlands: This cliff and beach area is more remote and more suited to less disturbing waterfront recreation, it still presents... trampling damage to native plants and chasing of bird life in fields and beaches,
 - places hikers and equestrian recreation in constant unwelcome and often volatile surprises on trails from dogs allowed to get ahead complacent owners,
 - expends too much public money to secure safety and rescue from falls off of cliffs
 - compromises sensitive cliffs from even more rapid erosion.

Off Leash dog use must be confined to the most common sense remote areas of Ft. Funston and all other Headlands regardless of size. All trails whose sides cannot be fenced must be for Dogs On Leashes Only. Enforcement of beach and trail use must be strictly enforced.

Map 16-C closes illustrates an acceptable compromise with the EXCEPTION that the inland off-leashes area and next to the parking lot MUST BE REMOVED and allow for dogs to be released ONLY when they get to the beach. More sensitive trails must be removed and ON-leashes until they arrive completely down the trails to the beach is acceptable.

Map 16-D is preferred, but it would be hell frozen over to enforce.

Response: The inland VSCA gives visitors the opportunity to walk dogs under voice and sight control in a non-beach setting. This VSCA is also located north of the main parking area and is easily accessible to handicapped/elderly visitors who are unable to walk dogs on-leash. The area south of the parking lot will be a dog free area except the trail to parking which will be on-leash. On-leash dog walking will be required on the Coastal trail and the southern beach sand ladder. Parallel on and off-leash trails or junctions will be separated by either land forms, vegetative barriers, fencing, chicanes or other design solutions that we will be looking to different user communities to assist in further developing.

CONCERN STATEMENT: (Concern ID: 53238) Commenters suggested establishing a ROLA loop trail from the parking lot.

Representative Quote(s):

Corr. ID: 432 Organization: *Not Specified* **Comment ID: 351359 Organization Type:** Unaffiliated Individual

Representative Quote: Fort Funston - I agree with some limitations on where dog-walking can occur but would like to see as much area as possible to continue to be open to off-leash dog-walking. And, it is very important that there be some kind of loop from the parking lot through the areas of the park that are allowed to be off-leash, rather than some very limited fenced-in area.

Response: A VSCA loop has essentially been created for Fort Funston leading from the main parking area. The loop includes the upland VSCAs, the Battery Davis trail (west), the Funston trail, the Funston Beach Trail (north) and the beach back up to the main parking lot. The exception is the segment up or down the southern sand ladder to the beach which, for safety reasons, must be on-leash.

CONCERN STATEMENT: (Concern ID: 53239) Commenters suggested decreasing the number of ROLAs and restricting dog walking from the following areas at Fort Funston: beach access trails including the sand ladder and south of the main parking lot.

Representative Quote(s):

Corr. ID: 4852 Organization: *Not Specified* **Comment ID: 361636 Organization Type:** Unaffiliated Individual

Representative Quote: At Fort Funston, I think that the plan gives way too much space for off-leash dogs - I love Fort Funston, but it is essentially a dog park now and in the current plan. I suggest that the future plan should further reduce areas for off-leash dog use. Fort Funston should have a much smaller area for dogs (especially off-leash dogs), so that people who want a dog-free hike can also enjoy this beautiful area.

Corr. ID: 6191 Organization: Golden Gate Audubon Society **Comment ID: 366115 Organization Type:** Unaffiliated Individual

Representative Quote: Ft. Funston - To the extent that NPS proceeds in allowing a ROLA at Ft. Funston, it must be fenced and fully marked to provide adequate notice to dog owners and other park users about where on- and off-leash dog activities are appropriate.

GGAS strongly opposes the Preferred Alternative, which creates a ROLA along the beach south of the Funston Beach Trail access. Given the historic noncompliance by dog owners at Ft. Funston and the sensitivity of the habitat, GGAS has concluded that dog related recreation on the Ft. Funston beach is not an appropriate use of the park land.

Because dogs should not be accessing the beach at Ft. Funston, GGAS further recommends that NPS not allow dogs on the beach access trails. The presence of dogs on the beach at Ft. Funston will adversely impact shorebirds. Additionally, the presence of dogs on the beach at Ft. Funston will adversely impact park visitors, including equestrians, some of whom have suffered attacks from dogs when riding at or near Ft. Funston.

GGAS opposes permitting dog recreation south of the main parking lot. Dog-related recreation on the Ft. Funston beach is not an appropriate use of that park land, there is no need for dogs to be on the beach access trails, especially Sand Ladder Trail. GGAS recommends that this area be designated as a "no-dog" area.

GGAS does not oppose the establishment of a ROLA north of the main lot at Ft. Funston provided (1) that the ROLA is

not established on sensitive habitat, (2) that the ROLA is fully contained by a natural or physical barrier with adequate signage, and (3) that the ROLA and surrounding areas are adequately patrolled and leash requirements are enforced.

Response: Dog walking would be allowed on the southern sand ladder and Funston Beach Trail north to allow access to the Beach VSCA and to create a continuous corridor between the upland VSCAs and Beach VSCA. The area south of the main parking lot will be a dog free area except that part of the Sunset trail from the main parking lot to the southern auxiliary parking area which will be on-leash. On-leash dog walking will be required on the Coastal trail, the southern beach sand ladder and all parking areas. Further reducing VSCAs at Fort Funston would create greater adverse impacts to dog walkers since the site is heavily used for this type of recreation.

CONCERN STATEMENT: (Concern ID: 53240) Commenters stated that the ROLAs within Fort Funston should be fenced and clearly marked. In addition, fencing should be installed along the sand ladder to protect the dunes in this area.

Representative Quote(s):

Corr. ID: 6353 **Organization:** *Not Specified* **Comment ID:** 365792 **Organization Type:** Unaffiliated Individual

Representative Quote: How can the NPS preferred option F be to concede to dog owners such a large and vital portion of this site to be designated ROLA? That would mean Ft Funston will effectively remain one large dog run, while continuing to be off limits to regular visitors.

I would like to see any ROLA area at Ft Funston fenced off from the paths and kept to one or two clearly designated areas. Give people a chance to use the trails again, please.

Why show greater preference to dogs than people? really. I would hope to see not only the number of dogs per person limited but the total number of dogs at this site brought under control. When visitors are outnumbered 10:1 by dogs, it's not a public recreation area anymore, it's a dog park.

Corr. ID: 6391 **Organization:** *Not Specified* **Comment ID:** 366065 **Organization Type:** Unaffiliated Individual

Representative Quote: Furthermore, standard practices in land management, such as better fencing, signage, and enforcement of current rules, could demonstrably mitigate any negative impact of both human and dogs to many GGNRA sites, including Crissy Field and Fort Funston. The fencing between the beach and the dunes of Crissy Field is very effective at limiting both human and dog intrusions into this sensitive environment. Better fencing along the sand ladder at Fort Funston is all that is needed to preserve the dunes in this area.

Response: The park will use design solutions including fencing or natural barriers to separate the VSCAs and adjacent on-leash and dog free areas, as well as to protect dune areas. Because this is a coastal dune area always subject to erosion and climactic conditions, ongoing community support would be particularly helpful to ensure these areas can be kept viable. Please see chapter 2, Preferred Alternative for Fort Funston for additional information on fencing and natural barriers.

CONCERN STATEMENT: (Concern ID: 53241) Commenters suggested that NPS should install more trash cans and have volunteer opportunities for visitors to clean up Fort Funston.

Representative Quote(s):

Corr. ID: 1206 **Organization:** *Not Specified* **Comment ID:** 351980 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm a frequent, almost daily, user of Fort Funston and weekly user of Chrisy Field.

I believe that these areas should remain as "off leash" dog areas. I do understand the need to some "education" for all visitors (dog and no dog people). I'd recommend some more basic signage ie) restricted access areas, stay on trail, etc.... Plus more garbage cans, not only for doggy poop but human litter, also; start fine/ticketing people who don't pick up dog waste and who litter. Have some rangers present in and around the areas of concern. I can't even recall the last time I saw a Park Ranger!!! It would be nice to see some Volunteer efforts, sponsored by the GGNRA, to help in the maintenance these areas, help educate and maybe even sponsor a monthly/quarterly "work parties."

Response: If it is determined that more trash cans are needed at Fort Funston, NPS will evaluate where they are needed and increase them where operationally feasible; however, the park has sought to instill a "pack in, pack out" philosophy due to the operational constraints of removing trash containers filled with dog waste (which can be over one hundred pounds and extremely difficult for park staff to empty) and to promote a "Leave No Trace ethic." In the past, volunteers have led clean up days at Fort Funston. These volunteer site opportunities would continue to both clean-up Fort Funston and provide on-going stewardship of that area.

CONCERN STATEMENT: (Concern ID: 57381) Off-leash dog walking should continue to occur at Fort Funston. Dog walkers should volunteer to help restore natural resources including native plantings and California quail.

Representative Quote(s):

Corr. ID: 527 **Organization:** *Not Specified* **Comment ID:** 351869 **Organization Type:** Unaffiliated Individual

Representative Quote: Vision for Fort Funston (which includes continued off-leash dog walking):

Reintroduce California quail

After

Enlisting dog owners to clear iceplant

Enlisting dog owners to plant native scrub plants under supervision of CA native plant society

Explicitly ban feeding ravens @ Ft. Funston with signage explaining that surplus ravens (supported by feeding) prey on baby quail

Note that presence of dogs keeps away feral cats, which also prey on baby quail

Enlist dog owners to keep dogs off new plantings

When scrub is mature enough to provide cover for quail, reintroduce!!!

Response: Dog walking would continue to occur at Fort Funston within the designated on-leash areas and VSCAs. Opportunities for volunteers to assist in restoration are always available.

CONCERN STATEMENT: (Concern ID: 57398) Commenters suggest allowing on-leash dog walking on the Funston Horse Trail in order to provide a complete walking loop for dog walkers. On-leash dog walking should also be available in areas north of the Funston Beach Trail.

Representative Quote(s):

Corr. ID: 6131 **Organization:** *Not Specified* **Comment ID:** 365532 **Organization Type:** Unaffiliated Individual

Representative Quote: Dogs should be permitted on more areas in Fort Funston. Dog walkers transformed this once dangerous area of the park into a safe and welcoming site. Opportunities are too limited. Please consider adding the Funston Horse Trail for on-leash dog access, so that we could have a loop trail to enjoy with our dogs, and as stated above, leashed access north of the Funston Beach Trail.

Response: On-leash dog walking of 1-3 dogs will be allowed on the Coastal trail north of the Funston Beach (north) trail to the Great Highway. The Funston Horse trail is a dog free trail that affords both horseback riders and others an opportunity to enjoy traversing that park area without dogs. Equestrian users have stated in public comment that mixing dogs and horses can be unsafe, resulting in riders being thrown or dogs kicked by horses. These users have requested that horse trails be kept dog free.

FM1400 - Fort Mason: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53242) Commenters suggested that for safety reasons the Laguna Green ROLA within Fort Mason should be relocated or fenced.

Representative Quote(s):

Corr. ID: 6242 **Organization:** *Not Specified* **Comment ID:** 366178 **Organization Type:** Unaffiliated Individual

Representative Quote: For Fort Mason, I prefer maps 9-D or 9-F (I cannot see a difference between them), provided the ROLA is fenced to restrict off-leash dogs to that area.

Corr. ID: 6420 **Organization:** *Not Specified* **Comment ID:** 366981 **Organization Type:** Unaffiliated Individual

Representative Quote: At Fort Mason, the area has long been used for dog walking, both on leash and off. It is a convenient location for many SF residents who need to walk and recreate with their dogs before and after work. In order to separate the dog walkers, you have set aside the green space on the corner of Bay Street across from Safeway for off-leash walking. This land slopes directly into the street! If dogs are allowed to play here off-leash there will surely be balls and dogs going into the busy street, which would be disaster. I imagine the only way to rectify this would be to build a very tall, expensive and unwanted fence. This will block views and destroy the open space San Francisco have enjoyed for a very long time.

Response: Safety concerns associated with the VSCA adjacent to the road at Fort Mason would be mitigated through the use of fencing, gates and hedges to prevent unintended dog access out to the street. To increase safety for visitors and off-leash dogs, perimeter fencing, hedges, or a berm bordering the side of the site will be installed to create a large buffer from the street.

CONCERN STATEMENT: (Concern ID: 53243) Commenters suggested limiting dog walking to the Laguna Green area, in order to provide visitors an opportunity without the presence of dogs within the Great Meadow at Fort Mason.

Representative Quote(s):

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 366944 **Organization Type:** Unaffiliated Individual

Representative Quote: Please modify the Upper Fort Mason component of Alternative D and F to provide visitors the opportunity to experience portions of the Great Meadow without the presence of dogs by limiting dogs to the southwestern section of Great Meadow, i.e., change Map 9-C so that the Great Meadow ROLA would be a Leash

Required area. Although it would be in contravention with NPS policies requiring pets be on leash at all times, the Laguna Green ROLA is one of a couple ROLAs proposed in this SEIS that could be deemed not irrational. It would provide an area in a dense neighborhood for those who want to let their dogs run amuck to do so.

Response: On-leash dog walking would be allowed within the Great Meadow. Neither off-leash dogs, nor groups of more than 3 dogs with one walker, would be allowed in the Great Meadow lawn areas as that could increase conflicts with picnickers and other recreational users in that area. Behavioral standards, including not having physical contact with another visitor unless invited by that visitor, would be enforced. A no-dog experience also would be available on the parade ground in front of the youth hostel and on the lawns around the Officer's Club. The addition of the VSCA in the southwest corner away from the Great Meadow is expected to direct visitors intending to walk dogs off-leash to that VSCA; that may reduce the number of dogs, especially any off-leash dogs, in the remaining areas of the site, including the Great Meadow. Please see chapter 2, Preferred Alternative for Upper and Lower Fort Mason for additional rationale.

FP1400 - Fort Point: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53244) Commenters stated that on-leash dog walking should only be allowed in non-sensitive areas within Fort Point.

Representative Quote(s):

Corr. ID: 158 **Organization:** Not Specified **Comment ID:** 349903 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Point - Only trails not in sensitive habitat should be open to leashed dogs.

Response: Fort Point is a largely developed site, and there were no impacts to sensitive natural resources given their absence there. Cultural resources at Fort Point would be further protected by not allowing dogs in the fort, and keeping dogs on-leash outside the fort on trails. The preferred alternative in the final plan/EIS would provide protection to sensitive resources from impacts associated with dogs.

CONCERN STATEMENT: (Concern ID: 53245) Commenters stated that no dog walking should be allowed within Fort Point.

Representative Quote(s):

Corr. ID: 6639 **Organization:** Not Specified **Comment ID:** 368127 **Organization Type:** Unaffiliated Individual

Representative Quote: Ft. Point: There is no reason whatsoever for dogs to be in this area whose purpose is strictly for historical review by humans.

Response: Dog walking is not allowed within Ft. Point itself. It is allowed under the preferred alternative along the coastal road shoulder as part of a continuous walk and experience from Crissy Field to under the GG bridge for dog walkers with 1-3 dogs. This is not a permitted area for dog walkers walking 4-6 dogs to use.

CONCERN STATEMENT: (Concern ID: 53246) Commenters stated that no ROLAs should be established at Fort Point due to resources and the high number of tourists at this site.

Representative Quote(s):

Corr. ID: 6492 **Organization:** Nature in the City **Comment ID:** 367583 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Point should not have a ROLA, both due to natural and historic resources, but also because of very high tourist visitation. Tourists come to see sweeping vistas and natural and cultural landscapes, not dogs running amok.

Response: VSCAs would not be established at Fort Point under the Preferred Alternative due to safety hazards and the lack of a beach or other open area suitable for establishment of a VSCA. Please see chapter 2 of the final plan/EIS for additional rationale for providing only on-leash dog walking at this site and for additional rationale for dismissing VSCAs on trails.

FT1400 - Fort Miley: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53247) Commenters stated that dogs should not be allowed within East Fort Miley.

Representative Quote(s):

Corr. ID: 6459 **Organization:** San Francisco League of Conservation Voters **Comment ID:** 368542 **Organization Type:** Unaffiliated Individual

Representative Quote: Lands End and Fort Miley- We commend and strongly support the elimination of dog activity in East Fort Miley.

Response: The preferred alternative at Fort Miley would allow on-leash dog walking in the east side trail corridor between Clement Street and the NPS boundary at East Fort Miley. No dog walking would be allowed in West Fort Miley. Overall, the preferred alternative would provide additional safety for visitors with dogs, given the site's traffic due to both construction

and hospital workers and patients from the adjacent VA hospital. Overall, the preferred alternative would provide for a variety of visitor experiences, including on-leash dog walking, protect park resources, and would be easily explainable and enforceable by park law enforcement staff.

GA1000 - Impact Analysis: General Comment

CONCERN STATEMENT: (Concern ID: 53320) Commenters stated that the justifications for the actions outlined in the DMP seemed speculative or unscientific. Many commenters noted that impacts stated in the draft plan/SEIS were overstated, and the environmental degradation from dogs was insignificant, and worried that the plan would increase environmental impacts.

Representative Quote(s):

Corr. ID: 2184 Organization: Not Specified Comment ID: 356677 Organization Type: Unaffiliated Individual

Representative Quote: Reading through various reports, I see very little included in the impact reports from those who support dog walking in these areas and yet a great deal from those opposed. Many of the impacts cited were 'mights' or 'cans' or 'coulds' - I find this lack of evidence along with the lack of site-specific studies to be disturbing.

Corr. ID: 2529 Organization: Not Specified Comment ID: 359028 Organization Type: Unaffiliated Individual

Representative Quote: As for other GGNRA locations, the NPS needs to provide substantial scientific evidence and measurements, instead of just speculation and exaggeration, before discouraging people from continuing our heritage of walking dogs in these areas. These same DEIS criteria for adverse impact levels would easily exclude all humans from the park without any evidence of real degradations to the environment.

Corr. ID: 4244 Organization: Crissy Field Dog Group Comment ID: 362317 Organization Type: Unaffiliated Individual

Representative Quote: Contrary to Congressional intention, the current GGNRA plan restricts off leash dog walking without factual basis, relying instead on outdated data and undocumented assumptions. It does not demonstrate that problems within the GGNRA are actually attributable to dogs and not to other factors such as crowds for special events, wildlife, and even nature herself. And these restrictions will negatively impact the few remaining areas allowing off leash walking.

Corr. ID: 6056 Organization: Not Specified Comment ID: 365272 Organization Type: Unaffiliated Individual

Representative Quote: I believe protecting our environment should be a high priority for our community, however, I encourage you to ensure that the policies implemented in the plan for the GGNRA don't overly rely on perceptions or assumptions about impacts of dogs on the GGNRA. Any decisions that would have a significant impact on the availability of this immense resource should be based on sound scientific evidence and process.

Corr. ID: 6518 Organization: Not Specified Comment ID: 367646 Organization Type: Unaffiliated Individual

Representative Quote: The SEIS has few scientific peer reviewed studies to show that dogs have a significant impact. They rely on the "best professional judgement of NPS staff." Anecdotal observations are not a scientific way to compile evidence. NPS staff have demonstrated a bias against dog walking, so their opinions cannot be trusted

Corr. ID: 6687 Organization: Not Specified Comment ID: 369193 Organization Type: Unaffiliated Individual

Representative Quote: The Draft Plan/DEIS/SEIS assumes, but fails to demonstrate, the "cause and effect" relationship that where dogs are present within GGNRA sites, there is a disturbance of natural resources or demonstrate that the disturbance of resources is attributable to dogs (versus other factors).

Response: Chapter 4, Impacts Analysis was revised to include additional data and studies, based on draft plan/EIS comments, to refine the conclusions in the final plan/EIS and reduce uncertainty regarding the level of impact from dogs. All NEPA analysis - no matter the amount of supporting data - is based on a prediction of potential future conditions and contains elements of uncertainty. In lieu of site-specific data (when not available), research methods generally accepted in the scientific community and best professional judgment have been used to draw conclusions regarding expected impacts to resources, consistent with CEQ and DOI requirements. The park has also supplemented its literature review based on public comments, including additional studies, the majority of which are peer reviewed. Please see chapter 4 for more detail. The available data provides sufficient information to allow the decision-maker to make a reasoned choice among alternatives.

CONCERN STATEMENT: (Concern ID: 53321) Commenters stated that the management plan does not recognize dog

walking as a valid recreation activity and that the continuation of urban recreation is not included in the objectives of the plan. Commenters also stated that the dog management plan would impact air quality due to the increase in emissions from driving to walk dogs. Commenters felt that the impacts of each alternative should be evaluated for additional resources including air quality and recreation.

Representative Quote(s):

Corr. ID: 3030 **Organization:** *Not Specified* **Comment ID:** 357728 **Organization Type:** Unaffiliated Individual

Representative Quote: This Environmental Impact Statement is fatally flawed because it utterly fails to address the single most serious environmental issue of our generation: Carbon Dioxide releases

This plan is an environmental disaster. How the NPS could have proposed this is crazy. At a time when we all are doing everything we can to curb CO2 emissions the NPS is requiring families to release millions of extra pounds a year. Yet the NPS chooses to totally ignore this in the Report.

Corr. ID: 6588 **Organization:** San Francisco Dog Owners Group **Comment ID:** 403550 **Organization Type:** Unaffiliated Individual

Representative Quote: THE SEIS DOES NOT CORRECTLY ADDRESS THE VALUE OF RECREATION IN THE GGNRA

The SETS contains a distinct bias against recreation in the GGNRA. The first two sentences in the legislation that created the GGNRA are:

In order to preserve for public use and enjoyment certain areas of Mann and San Francisco Counties, California, possessing outstanding

Corr. ID: 6588 **Organization:** San Francisco Dog Owners Group **Comment ID:** 405831 **Organization Type:** Unaffiliated Individual

Representative Quote: THE SEIS DOES NOT CORRECTLY ADDRESS THE VALUE OF RECREATION IN THE GGNRA

The SETS contains a distinct bias against recreation in the GGNRA. The first two sentences in the legislation that created the GGNRA are:

In order to preserve for public use and enjoyment certain areas of Mann and San Francisco Counties, California, possessing outstanding

Corr. ID: 6596 **Organization:** *Not Specified* **Comment ID:** 369626 **Organization Type:** Unaffiliated Individual

Representative Quote: This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

Corr. ID: 6716 **Organization:** San Francisco Dog Owners Group **Comment ID:** 499764 **Organization Type:** Unaffiliated Individual

Representative Quote: Even if recreation was not so critical to the GGNRA's founding, NEPA rules require that agencies consider impacts of alternatives on recreation. This is especially crucial in the GGNRA because its location in the middle of an urban setting means that GGNRA lands serve as residents' backyards. Most of us who live in San Francisco do not have yards, and we rely on park open space for our recreational needs. The GGNRA is where people in San Francisco, and indeed in the entire Bay Area, come to play. For example, the only beaches available to the people in San Francisco are controlled by the GGNRA. Removing recreation from the GGNRA will have a significant negative impact on the quality of life of the people of the Bay Area, and that impact should have been included in the SEIS.

Response: Dog walking is considered a recreation activity within GGNRA and has been included in the objectives for Visitor

Experience and Health and Safety. In addition, urban recreation and quality has been incorporated into the impact analysis for park operations and visitor experience. Please see chapter 4 for more details. Impacts to air quality was dismissed from the impact analysis. Vehicle miles traveled because of recreational dog walking in GGNRA are negligible in the context of regional travel. Please see chapter 1 for additional rationale.

CONCERN STATEMENT: (Concern ID: 53322) Commenters noted that site specific and peer-reviewed studies were lacking in the draft plan/SEIS and needed to be completed. Other commenters stated that the information presented in the impacts analysis was outdated or that staff input and anecdotes were used to prove impacts from dogs. Studies in the draft plan/SEIS should undergo a more rigorous peer review process to determine if the impacts presented were based on sound science.

Representative Quote(s):

Corr. ID: 667 **Organization:** Ocean Beach Dog Walkers **Comment ID:** 352866 **Organization Type:** Unaffiliated Individual

Representative Quote: How can the GGNRA undertake a Dog Management Policy change as proposed in this SEIS without any evidence of monitoring or site specific studies (as required by federal law) as a means to identify the alleged impairment?! Anecdotal comments and the "potential" to damage the area just don't cut it.

Corr. ID: 1011 **Organization:** *Not Specified* **Comment ID:** 351428 **Organization Type:** Unaffiliated Individual

Representative Quote: SEIS admits there are few scientific, peer-reviewed studies that show impacts from dogs (e.g., on vegetation and soils, p. 375), so they cite anecdotal observations of impacts made by NPS staff. However these anecdotal claims have no context - how frequent were they, how serious, etc. - and cannot be used to set policy. An SEIS is supposed to be based on science, not anecdote. The SEIS also says it relies on the "best professional judgment of NPS staff" to determine impacts from dogs and their importance when there are no scientific studies of impacts in other parks available (e.g., p. 396). NPS staff have demonstrated a long-standing, strong bias against dog walking, and the SEIS should not depend largely on their biased judgment and anecdotes for "proof" that impacts from dogs are currently occurring

Corr. ID: 2087 **Organization:** *Not Specified* **Comment ID:** 355678 **Organization Type:** Unaffiliated Individual

Representative Quote: Health and social benefits aside, there hasnt been a single peer-reviewed, site-specific study (as required by law) that supports such a drastic restriction of dog-friendly areas. Both the DEIS and SEIS fail to prove negative impacts are not only occurring now but that dogs are causing them. We want real science not anecdotes.

Corr. ID: 2378 **Organization:** *Not Specified* **Comment ID:** 358450 **Organization Type:** Unaffiliated Individual

Representative Quote: The plan admits there are few scientific, peer-reviewed studies that show impacts from dogs (e.g., on vegetation and soils, p. 375) so they cite anecdotal observations of impacts made by NPS staff. A supplemental environmental impact statement needs to be based on science, not anecdote.

Corr. ID: 2826 **Organization:** *Not Specified* **Comment ID:** 357572 **Organization Type:** Unaffiliated Individual

Representative Quote: SEIS says that, during the last six years, NPS staff did extensive literature searches to look for reports of impacts from dogs in other parks. In that same time, they could easily have conducted the site-specific studies that might have shown whether or not impacts are occurring in the GGNRA. Yet they chose not to do them.

Corr. ID: 5270 **Organization:** *Not Specified* **Comment ID:** 362846 **Organization Type:** Unaffiliated Individual

Representative Quote: In addition, the SEIS fails to link off-leash and on-leash dog walking with documented resource impacts. GGNRA's SEIS has failed to provide actual scientific data about dog walkings impact on natural resources in Rancho, such as wildlife and vegetation. Not only does GGNRA not have any peer-reviewed scientific data about resource impacts, all of the resource impact statements in the SEIS are purely speculative. Off-leash and on-leash dog walking has occurred in Rancho Corral de Tierra for decades, including during the past two years while it has been under the management of GGNRA (as acknowledged in the SEIS). Despite this history, Rancho continues to provide valuable habitat for wildlife.

Corr. ID: 5271 **Organization:** *Not Specified* **Comment ID:** 362856 **Organization Type:** Unaffiliated Individual

Representative Quote: I feel strongly, as a working environmental scientist for the Federal government, that the

conclusions in this document are not science based and the SEIS should undergo peer review per the policy of the NPS (Interim Guidance Document Governing Code of Conduct, Peer Review, and Information Quality Correction for National Park Service Cultural and Natural Resource Disciplines, 2008).

This document is essentially a programmatic EIS as there is insufficient information and analysis for each site to adequately inform science-based decision-making for such a large geographic area. The NPS should treat this document as a Programmatic EIS and tier off site-specific NEPA documents from it.

Corr. ID: 5546 Organization: Not Specified Comment ID: 363930 Organization Type: Unaffiliated Individual Representative Quote: Regarding the process, the studies and information the GGNRA is relying on in its latest supplemental environmental impact statement are outdated - it hasn't updated the enforcement data since the last draft EIS was released.

Corr. ID: 6101 Organization: Not Specified Comment ID: 365416 Organization Type: Unaffiliated Individual Representative Quote: After almost three years and two draft plans comprising a combined 4,300 pages, where is the scientific study conducted at Fort Funston or any other recreational unit in the GGNRA? There are few, if any, scientific, peer-reviewed studies that show impacts from dogs (e.g., on vegetation and soils, p. 375), so the plan cites anecdotal observations of impacts made by National Park Service Staff. However these anecdotal claims have no context - how frequent were they, how serious, etc. - and cannot be used to set policy. An EIS is expected to be based on science, not anecdote.

Corr. ID: 6404 Organization: Not Specified Comment ID: 366216 Organization Type: Unaffiliated Individual Representative Quote: A major flaw shared by both the 2011 DEIS and the 2013 SEIS is they provide no site-specific studies or evidence to support their strongly stated conclusions that allowing dogs access to limited areas in the GGNRA results in a negative impact on those areas. This process has been going on for more than eight years, giving the GGNRA ample time to gather data demonstrating a severe negative impact from off-leash dog walking, but they have chosen not to do so.

Corr. ID: 6636 Organization: Not Specified Comment ID: 368106 Organization Type: Unaffiliated Individual Representative Quote: There hasn't been a single peer-reviewed, site-specific study (as required by law) that supports the proposed drastic restriction of dog-friendly areas. Both the DEIS and SEIS fail to prove negative impacts are not only occurring now but that dogs are causing them. Dogs and their walkers are not going off trail so how many dogs are in fact leaving these trails and invading critical wildlife habitat? The GGNRA should take a balanced, fact-based approach to its environmental analysis, provide the data and stop speaking hypothetically. We would ask the GGNRA to conduct the necessary site specific peer-reviewed studies before making any changes to the uses of our recreational land.

Corr. ID: 6686 Organization: Not Specified Comment ID: 369061 Organization Type: Unaffiliated Individual Representative Quote: this comment contains review of "studies" proffered by the GGNRA to substantiate restrictions designed to protect the Western snowy plover. These "studies" fail to adhere to the Code of Scientific and Scholarly conduct with respect to all three provisions listed above. We should point out that upon receiving these allegations in written form by way of our Comment on the DEIS, the NPS did not modify their planned restrictions but did remove the studies from the SEIS. Compliance with the law would have required withdrawal of the entire DMP.

Response: Chapter 4, Impacts Analysis was revised to include additional data and studies, based on DEIS comments, to refine the conclusions in the final plan/EIS and reduce uncertainty regarding the level of impact from dogs. All NEPA analysis - no matter the amount of supporting data - is based on a prediction of potential future conditions and contains elements of uncertainty. In lieu of site-specific data (when not available), research methods generally accepted in the scientific community and best professional judgment have been used to draw conclusions regarding expected impacts to resources, consistent with CEQ and DOI requirements. The park has also supplemented its literature review based on public comments, including additional studies, the majority of which are peer reviewed. Please see chapter 4 for more detail. The available data provides sufficient information to allow the decision-maker to make a reasoned choice among alternatives.

CONCERN STATEMENT: (Concern ID: 53323) Many commenters expressed that the impacts analysis did not adequately compare the impacts of dogs in relationship to other factors, such as human impacts.

Representative Quote(s):

Corr. ID: 930 Organization: Not Specified Comment ID: 353783 Organization Type: Unaffiliated Individual

Representative Quote: I do not see where in the SEIS there is conclusive scientific data showing that dog walkers and owners are causing damage to designated off-leash areas, which means there is no legitimate or legal foundation for these policy changes. The plan doesn't differentiate between impacts caused by humans or other animals. It just assumes all the negative impacts are caused by dogs.

Corr. ID: 4418 Organization: Not Specified Comment ID: 365166 Organization Type: Unaffiliated Individual

Representative Quote: The Park Service should revise the dog management plan to: Exclude speculative, exaggerated, biased, or misleading statements and studies.

- Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Corr. ID: 6167 Organization: Not Specified Comment ID: 365708 Organization Type: Unaffiliated Individual

Representative Quote: The failure of the plan to distinguish between impacts on the GGNRA resources by people, or dogs, or by other causes is lacking in the document. Site specific observations such as 'high foot traffic' (both people and dogs) needs to be analyzed to determine whether off-leash areas differ from other areas of high traffic; and, where people need to be prohibited from these areas to protect natural resources. Yet the very area the GGNRA is trying to protect in Muir Beach - dunes riparian forest, lagoon - is abused by people every day.

Response: The scope of the EIS is limited to dog walking, thus the impacts of other uses are not analyzed as direct impacts, unless they are related to the proposed action (for example, redistribution or increases in visitation of non-dog walkers). NPS realizes that other park uses such as biking, hiking, beach driving, and special events (i.e. Fleet Week) create impacts to park resources; however, impacts described in the final plan/EIS focus on impacts related to dog-walking. Existing conditions includes ongoing effects from other park uses including but not limited to hiking, running, biking, picnicking, beach going, and equestrian riders.

CONCERN STATEMENT: (Concern ID: 53324) Commenters felt that the document should better describe the current setting and environment of the GGNRA in relation to its larger setting within a large urban area. Some commenters noted the need for the analysis of sites to take into account their location and condition.

Representative Quote(s):

Corr. ID: 632 Organization: Not Specified Comment ID: 352776 Organization Type: Unaffiliated Individual

Representative Quote: The document failed to properly characterize the urban setting of the GGNRA; reading the document one is left with the impression that the GGNRA is a wilderness area, and not the urban parklands of the San Francisco Bay region. The document should better characterize the general setting of the GGNRA, and the level of visitation to the GGNRA.

Corr. ID: 3404 Organization: Not Specified Comment ID: 359142 Organization Type: Unaffiliated Individual

Representative Quote: The proposal does not show what the true environmental problem is that we're trying to address. Nor does the proposal analyze the impact to the broader bay area / sf environment should the nps proposal be enacted. Consequently, this plan is unbalanced and unworthy of approval.

Corr. ID: 6339 Organization: Not Specified Comment ID: 365643 Organization Type: Unaffiliated Individual

Representative Quote: Throughout this report, the authors provide arguments about policies and impacts that are reasonable for wilderness parks, but make no sense at all for a park located within the San Francisco city environment. Most importantly, there is no actual data showing how these regulations might or might not work in a city setting. Before imposing a huge change in policy on our entire city, I would like to see some real data showing what, if any, of the intended consequences are even possible within San Francisco. The report really has no data that is relevant to the situation in San Francisco

Corr. ID: 6407 Organization: Not Specified Comment ID: 366285 Organization Type: Unaffiliated Individual

Representative Quote: I find a preponderance of unsupported statements about the impact of dogs on the areas of the Recreation Area. Many of these statements make no sense to me, given the spaces that are being considered for a dramatic change in use policy.

I find many statements that could be true in a remote wilderness area, but make no sense at all when placed in the

context of park spaces in the middle of San Francisco. Fort Mason, for example, is within 50 meters of a Safeway, and is surrounded on 3 sides by Bay and Van Ness streets. There are fire engines, ambulances, cars, motorcycles and aircraft in the air and on the ground around Ft. Mason. . The Ft. Mason parking lot has food festivals, music festivals, a farmer's market, and many other uses. This is not a space where sensitive birds come to find undisturbed rest or where sensitive plants need to be protected from people and their pets. It is absurd to apply the standards and goals of the national parks to these areas, because there is simply no possibility of achieving the "preservation of natural habitats" that is the normal objective.

Corr. ID: 6436 **Organization:** *Not Specified* **Comment ID:** 367499 **Organization Type:** Unaffiliated Individual
Representative Quote: To me, the flaw in this report is that the comments about goals and considerations are equally applied to these very different spaces, even though the benefits of public use are immensely greater in these SF city areas, and the potential improvements for habitat and wild animals are basically non-existent in these areas. Crissy Field East and West beach are mostly barren sand-scapes without any fragile vegetation, and no native wildlife. Aside from some very infrequent disturbance of the Plover habitat, these beaches are areas without any real opportunity for protection, which also provide an immense public recreational benefit.

Unfortunately, the report fails to distinguish these areas from each other. In failing to do so, the report fails to provide any true appreciation for the benefits of public use - instead, preservation of habitat for plants and animals is treated as an absolute objective second to none.

I think it is essential to understand that the mostly urban park circumstances of Crissy Field, Ft. Point, Ft. Mason and similar spaces MUST be considered in a different way than a trail at the top of the marin headlands, far from the noise and craziness of the city

Corr. ID: 6540 **Organization:** *Not Specified* **Comment ID:** 368709 **Organization Type:** Unaffiliated Individual
Representative Quote: Related to this, the data collected was too limited. It did not take into account the broader urban area and what would happen in San Francisco, as a whole, if the GGNRA plan is adopted. An approach more similar to mediation of competing interests would lead to data collection that would support compromise. The present approach has been data collection in an attempt by one side to win an argument over another side.

Response: The enabling legislation for GGNRA described in chapter 1 states the need for preserving recreation area within the urban environment. In addition, the current setting and environment is detailed throughout chapter 3, Affected Environment.

CONCERN STATEMENT: (Concern ID: 53325) Many commenters expressed frustration that allowing dogs on-leash on more trails or off-leash on trails was not sufficiently analyzed, and that the decision to remove dogs from many trails was not based on evidence.

Representative Quote(s):

Corr. ID: 1814 **Organization:** *Not Specified* **Comment ID:** 354139 **Organization Type:** Unaffiliated Individual

Representative Quote: There is no evidence presented that off-leash dog walking on GGNRA trails has had any negative impacts. Despite this, the GGNRA decided not even to consider the possibility of off-leash dog walking on any trails at all.

Corr. ID: 1919 **Organization:** *Not Specified* **Comment ID:** 354550 **Organization Type:** Unaffiliated Individual
Representative Quote: There's no proposal for truly expanded dog use. If one is concerned about the effects of dogs on trails - then it should at least be considered that providing more acceptable trails would spread out the use and mitigate more severe effects on the currently acceptable areas. A rotation could also be considered. Limiting dogs to a small trail corridor (or a handful of trails of any mileage as proposed) will naturally increase the number of dogs on those trails and magnify the real or imagined damage.

Response: Voice and sight control areas (VSCAs) is allowed on approximately 1/3 of all GGNRA park beach miles, and on leash dog walking is allowed on approximately 1/3 of all park trail miles.

Establishing VSCAs on trails throughout some of the GGNRA sites was considered but dismissed (please see chapter 2 of the final plan/EIS, Alternative Elements Eliminated from Consideration). Establishing VSCAs on park trails would create safety concerns for other park users since many trails are relatively narrow and have limited line of sight, which could inhibit use of areas by some visitors due to having to travel through a ROLA when using any trails wholly, or even partly, designated as

ROLAs. There is also a higher likelihood of impacts to adjacent resources as off-leash dogs can more easily access habitat adjacent to trails than a dog walked on leash. Even if a trail is a wide, multi-use trail or fire road, a VSCA would still interfere with access by other users, and unless fenced, would allow impacts to adjacent habitat. For these reasons, VSCAs would not be established on park trails or fire roads. However, due to the consensus agreement by the Negotiated Rulemaking Committee, and the park's commitment to include the committee's consensus agreements in the range of alternative for analysis, a VSCA on a fire road/trail is being considered under alternatives C and E at Oakwood Valley (northern section of the Oakwood Valley Loop Trail).

On-leash dogwalking was also considered on a range of trails, and as noted above, allowed on approximately 1/3 of all trail miles within GGNRA. GGNRA is not allowing on-leash dog walking on every trail, as the park wants to ensure a no dog experience on trails as well, based on public comment requests and noting that dog walkers make up only 10-12 percent of all park visitors. In addition, some trails are adjacent to or go through sensitive and/or contiguous habitat.

Please see chapter 4 of the final plan/EIS for potential impacts from on and off leash dog walking to a range of impact topics.

CONCERN STATEMENT: (Concern ID: 53326) The draft plan/SEIS did not present reasons why on-leash dog walking provided additional protection.

Representative Quote(s):

Corr. ID: 5020 **Organization:** Not Specified **Comment ID:** 362018 **Organization Type:** Unaffiliated Individual

Representative Quote: it is unclear what additional protection "on leash" laws have over "sight and voice-control" laws which, if properly enforced, serve the same purpose - to ensure dogs are not destroying habitat and interfering with other recreational users' experiences.

Response: On-leash dog walking provides additional protection to both park resources and visitors. Restraining dogs on a 6 foot leash prevents dogs from going off trail or outside of VSCAs into sensitive wildlife habitat. Leashes also minimize the chance of dogs chasing wildlife. In addition, the opportunity for dogs to approach other visitors is also minimized as the dog owner is more aware of the dogs behavior and can therefore manage it effectively, reducing visitor conflicts. Dog owner / owner responsibility is underscored in the final plan/EIS. This is further discussed in chapter 4 of the final plan/EIS.

CONCERN STATEMENT: (Concern ID: 53327) Commenters noted that the NPS impacts analysis was thorough, and supported the analysis completed in the draft plan/SEIS.

Representative Quote(s):

Corr. ID: 5089 **Organization:** Not Specified **Comment ID:** 362167 **Organization Type:** Unaffiliated Individual

Representative Quote: The review provided by NPS for GGNRA is very complete and educational. As a dog owner and supporter of environmental protection, I am happy that the analyses have been as expansive as they have been.

Corr. ID: 6323 **Organization:** Marin Audubon Society **Comment ID:** 365535 **Organization Type:** Unaffiliated Individual

Representative Quote: We appreciate the extensive research that went into the preparation of the Draft SEIS, especially the 24 peer reviewed studies that confirm the impact of dogs on wildlife and habitats. The findings of these studies are applicable to impacts of dogs everywhere and provide ample support for recommendations to limit dog use to protect wildlife in sensitive habitats.

Response: GGNRA has worked to make the environmental analysis as comprehensive as possible, and appreciates your comment.

CONCERN STATEMENT: (Concern ID: 53328) Commenters made suggestions about how data should be used in the draft plan/SEIS, including on the use of peer-reviewed sources, and addressing limitations in studies. Commenters felt that the studies and surveys used in the impact analysis were lacking scientific rigor and the conclusions or results from the studies were misrepresented or outdated. There is also a lack of monitoring data on resources or visitor use patterns. Commenters also stated that the impacts from dog walking are being weighted/compared to those impacts associated with restoration and enhancement projects at the park. Therefore, commenters did not agree with the impact analysis and suggested different impact levels for some of the alternatives.

Representative Quote(s):

Corr. ID: 6631 **Organization:** Not Specified **Comment ID:** 368440 **Organization Type:** Unaffiliated Individual

Representative Quote: The SEIS needs to relax its focus on only using peer-reviewed sources. The Department of Interior guidelines for the use of science are concerned with the integrity of the use of science. Over reliance and peer-

reviewed sources that may not be relevant lacks integrity compared with judicious use of peer reviewed and other sources. There is a sufficient body of literature to describe and determine the probable level of impacts of off-leash dogs in much more detail than currently in the SEIS.

Corr. ID: 6631 **Organization:** *Not Specified* **Comment ID:** 368419 **Organization Type:** Unaffiliated Individual
Representative Quote: Any use of the data must address the limitations of the survey methods and the fact that some species may have abandoned sites, especially smaller sites, due to off-leash dog activity over many years. The EIS needs to avoid such simplistic interpretations of the data.

Response: Chapter 4, Impacts Analysis was revised to include additional data and studies, based on draft plan/EIS comments, to refine the conclusions in the final plan/EIS and reduce uncertainty regarding the level of impact from dogs. All NEPA analysis - no matter the amount of supporting data - is based on a prediction of potential future conditions and contains elements of uncertainty. In lieu of site-specific data (when not available), research methods generally accepted in the scientific community and best professional judgment have been used to draw conclusions regarding expected impacts to resources, consistent with CEQ and DOI requirements. The park has also supplemented its literature review based on public comments, including additional studies, the majority of which are peer reviewed. Please see chapter 4 for more detail. The available data provides sufficient information to allow the decision-maker to make a reasoned choice among alternatives.

CONCERN STATEMENT: (Concern ID: 53329) Some commenters noted that the impacts of increased visitor use were not considered.

Representative Quote(s):

Corr. ID: 6323 **Organization:** Marin Audubon Society **Comment ID:** 403548 **Organization Type:** Unaffiliated Individual

Representative Quote: Impacts of Increased Visitor Use Not Considered

It should be recognized that, just as use of GGNRA lands has increased over the years, uses will undoubtedly continue to increase as our human population increases.

Response: Future park visitation was considered in the final plan/EIS. Forecasts of the park visitation can be found in chapter 3, Visitor Use and Experience, with impacts in chapter 4. Park visitation would range between 12.8 million to 15.8 million people annually, similar to how it has been operating over the previous 20 years. Visitation to GGNRA is not expected to experience a significant increase; therefore, no additional impacts are expected.

CONCERN STATEMENT: (Concern ID: 53330) Some commenters noted that mitigation should be presented to address the increased impacts on habitat and wildlife that would accompany the anticipated increased uses of some or all of the trails.

Representative Quote(s):

Corr. ID: 6323 **Organization:** Marin Audubon Society **Comment ID:** 403549 **Organization Type:** Unaffiliated Individual

Representative Quote: Mitigation should be presented to address the increased impacts on habitat and wildlife that would accompany the anticipated increased uses of some or all of the trails.

Response: The final preferred alternative in the final plan/EIS is intended to reduce impacts on park resources and values. Where necessary, mitigation measures for dog walking have been described in the final plan/EIS. For example, the Monitoring Management Strategy describes primary and secondary management actions that would be implemented if dog walking activities approach an unacceptable impact to resources. Please see chapter 2 of the final plan/EIS for additional details.

CONCERN STATEMENT: (Concern ID: 53332) The impact analyses as well as the Environmentally Preferred Alternative rely on compliance to evaluate the impacts of the Plan as negligible. This is an unrealistic approach because many people will not comply and it overestimates benefits of requiring leashes or eliminating dog walking. The Plan, therefore, would be ineffective in achieving impact levels that are negligible. Commenters also had an issue with the comparison between the no action alternative under little enforcement, and the action alternatives with full enforcement.

Representative Quote(s):

Corr. ID: 6323 **Organization:** Marin Audubon Society **Comment ID:** 403547 **Organization Type:** Unaffiliated Individual

Representative Quote: The impact analyses as well as the Environmentally Preferred Alternative rely on compliance to evaluate the impacts of the Plan as negligible. This is an unrealistic approach because many people will not comply. The Plan, therefore, would be ineffective in achieving impact levels that are negligible.

The DSEIS acknowledges that even with "assuming compliance" the preferred alternative would result in localized impacts but these would be considered minor based on the assumption that dog users will comply with the regulations. Repeated observations of dog users over time, however, clearly demonstrate that this is not the case. Dog's users throughout Marin County violate dog restriction, ignore signs and sometimes destroy or steal them, and disregard policies and regulations with impunity. While many people do obey the law, particularly if they understand why, many will not. This cannot be ignored in evaluating the significance of the impacts. In addition, even localized impacts could be major when endangered species and their habitats are involved.

Conclusions that the potential impacts will be negligible are unsubstantiated and invalid until and unless the NPS presents a dependable program that will ensure dog walkers will stay on trails and not harass wildlife or damage habitat. The only way this can be assured is through an effective monitoring and enforcement program. At minimum, there needs to be a strong enforcement program that ensures dogs are restricted from sensitive habitats. It would also be helpful if dogs were restricted on more trails.

Corr. ID: 6717 Organization: K&L Gates LLP Comment ID: 499876 Organization Type: Unaffiliated Individual Representative Quote: The DSEIS is also internally inconsistent regarding enforcement and compliance assumptions. The NPS characterizes user conflict under the No Action Alternative based on incidents that are not currently acceptable or lawful behavior - - harassment or assault by a dog is already prohibited under the current rules. The DSEIS enforcement data, which is the basis for user conflict analysis, has not been updated since the 2011 DEIS. The Final EIS should either updates its analysis or explain why the information is unavailable. 40 C.F.R. 1502.22.

But for the NPS preferred alternative (and all other action alternatives), the DSEIS assumes compliance. Given the NPS's position that compliance is impossible under the status quo (22) and its recognition that nearby dogwalking areas experience "major" noncompliance, (23) compliance is not a reasonable assumption for the action alternatives. This is especially true for an agency with such patently inadequate enforcement resources. No agency, especially not one with only nine enforcement personnel to cover 80,000 acres, (24) can guarantee perfect compliance. This assumption is unrealistic and inconsistent with baseline conditions, and ultimately skews the analysis by overestimating the benefits of requiring leashes or banning dogs. A realistic assessment should consider impacts from alternatives where noncompliance is comparable to current or reasonably anticipated rates of noncompliance.

While the NPS's objective is to improve compliance, more strict restrictions may increase noncompliance if visitors are not aware of new regulations or committed to achieving compliance. The DSEIS should undertake a realistic assessment of community buy-in to its proposed plans, including more deference to commonly accepted policies resulting from the negotiated rulemaking process, which had achieved a greater degree of stakeholder support than any other management plan proposed to date.

Response: Impacts from the preferred alternative range in effect, and are not solely negligible. However, the impact analysis does assume a higher rate of compliance with the regulation in evaluating impacts than under the current condition, based in part on forecasted increases in education and enforcement. If non-compliance occurs and impacts to resources approach an unacceptable level, primary and secondary management actions would be implemented through the Monitoring Management Strategy. Please see chapter 2 of the final plan/EIS for additional details.

CONCERN STATEMENT: (Concern ID: 57424) At Homestead Valley, impacts from dog walking are analyzed for future trails where the exact location has not been identified. Commenters feel it is necessary to have detailed information on these trails in order to complete a sufficient impact analysis.

Representative Quote(s):

Corr. ID: 6323 Organization: Marin Audubon Society Comment ID: 365555 Organization Type: Unaffiliated Individual

Representative Quote: Need for Environmental Review for New Trails

It appears that trails that are not presently in existence are being considered part of the Management Plan and evaluated in this DSEIS, such as new trails at Homestead Valley. It also appears that the trail locations may have not even been determined at this time.

This DSEIS should provide sufficient information about these and any other trails that are not currently in place. This is necessary to enable evaluation of the potential adverse impacts on adjacent habitats and wildlife of human and dog use

and to evaluate whether there is a less environmentally damaging alternative location. If this information is not provided in this DSEIS, a separate environmental review for these non-existent trails should be conducted.

Response: The exact locations for the neighborhood connecting trails at Homestead Valley have been identified and analyzed in the environmental impacts. The location of the connecting trails are shown on the map of the preferred alternative in Map 3-F.

CONCERN STATEMENT: (Concern ID: 57438) Several commenters questioned how ROLAs would be defined, how mitigation would be completed, and if ROLAs would be completely enclosed.

Representative Quote(s):

Corr. ID: 5151 **Organization:** International Urban Estuary Network/Save the Bay **Comment ID:** 362278

Organization Type: Unaffiliated Individual

Representative Quote: The Preferred Alternative does not specify how the ROLAs will be achieved.

The Preferred Alternative does not describe how park visitors will be adequately informed of the ROLA boundaries for the six sites in the Preferred Alternative F.

Nor does it state that ROLAs will be fully enclosed, to guarantee that off-leash dogs are contained.

Response: VSCAs would not be fully enclosed; however, dog walking areas in each location would be delineated and marked. Standard landscape design elements may be installed to aid in differentiation of dog walking areas provided that wildlife movement is protected. Landscape design elements may also be utilized to mitigate and to protect restoration areas, delineate areas that require closure or separation for safety purposes, and to reduce user conflicts, or to address other dog management needs.

CONCERN STATEMENT: (Concern ID: 57439) Voice control should not be considered an option unless NPS can provide evidence that it is an effective off-leash dog management option.

Representative Quote(s):

Corr. ID: 4256 **Organization:** Not Specified **Comment ID:** 368466 **Organization Type:** Unaffiliated Individual

Representative Quote: The SEIS fails to provide evidence that voice control is an effective off-leash dog management option. While the SEIS does loosely describe and discuss the concept of voice control, it does not evaluate voice control for its degree of effectiveness, nor does it demonstrate the abilities of the general dog walking public to employ such a method. Unless it is clearly demonstrated to be as effective as the use of a leash, voice control should not be considered as an option for use in any area of the GGNRA that is open to multiple visitor uses

Response: NPS staff obtained dog management policies, information on visitor experience/conflict information, enforcement success, and other applicable information from a variety of state, regional, county, and city park and recreation agencies. This information was used when determining appropriate dog walking areas and forms of dog walking (on-leash vs. VSCAs), and effective behavioral requirements. VSCAs were determined to be an effective and common form of dog walking management by both county and regional public agencies who allow off-leash. It is most effective when the dog owner and dog being walked are trained. For those walking 4-6 dogs, this is a requirement under an NPS permit; for all others walking 1-3 dogs, it will be encouraged. Under the Monitoring Management program, if non-compliance occurs and impacts to resources or other visitors approaches an unacceptable level, primary and secondary management actions would be implemented, including the possibility that off-leash dog walkers could be required to participate in and/or demonstrate such training before being able to walk their dog off-leash in the park. Details are described in chapter 2 of the final plan/EIS.

CONCERN STATEMENT: (Concern ID: 57803) Commenters felt that the impacts analysis was inadequate because it did not consider the impacts of the current conditions (alternative A) with enforcement when comparing it to the preferred alternative, which has assumed enforcement and compliance. Additionally, one commenter mentioned that the impact analysis should consider the impact of lack of enforcement in the action alternatives, given the current inability of NPS to provide adequate enforcement.

Representative Quote(s):

Corr. ID: 3100 **Organization:** Not Specified **Comment ID:** 405836 **Organization Type:** Unaffiliated Individual

Representative Quote: The proposed ban on dogs at Ocean Beach between Stairwell 21 and Sloat Blvd is inappropriate and unjustified. The NPS is proposing a complete ban on dogs without considering enforcing the current on-leash policy. In fact, the impacts analysis section of the document compares the impacts of the current on-leash policy with little-to-no enforcement to the preferred alternative of a dog ban with enforcement. To truly compare the impacts of an on-leash policy at Ocean Beach versus a ban on dogs, the NPS would need to compare both scenarios with similar levels of enforcement.

Corr. ID: 3143 **Organization:** *Not Specified* **Comment ID:** 405837 **Organization Type:** Unaffiliated Individual
Representative Quote: The SEIS compared on-leash impact with non-compliance in the SPPA to no dogs assuming compliance; however, the SEIS did not provide any justification for the assumption that enforcement of a no-dog policy in the SPPA would have any better rate of compliance. The GGNRA would need to compare a no-dog policy with non-compliance to an on-leash dog policy with non-compliance in order to justify any claim of a beneficial impact. If the GGNRA intends to enforce a no-dog policy in the SPPA then it would need to compare a no-dog policy with enforcement and compliance to an on-leash dog policy with enforcement and compliance.

Corr. ID: 4118 **Organization:** *Not Specified* **Comment ID:** 362041 **Organization Type:** Unaffiliated Individual
Representative Quote: Second, without effective enforcement, none of the Alternatives will be successful. The SEIS is silent on the current level of ineffective enforcement, and on any plans for increased and truly effective enforcement of current dog use regulations. This is a critical flaw of the SEIS, because like the issue of "voice control", the Alternatives are purely theoretical in intended outcome if not backed up by effective enforcement. I urge the NPS to not be silent on this practical disconnect. The best Alternatives will be greatly diminished in their intended outcome without effective enforcement. To advance an Alternative under NEPA, but not have practical supporting actions by the responsible federal agency to make the intended outcomes reasonably achievable, is flawed policy making at best.

Response: Please see the final plan/EIS, chapter 2, Alternatives Eliminated from Further Consideration, "No Action" (Alternative A) which Assumes Compliance, for information on why this alternative was not considered, and therefore not analyzed.

GA2000 - Impact Analysis: Use Trends And Assumptions

CONCERN STATEMENT: (Concern ID: 53333) Commenters questioned the levels of incidents with dogs presented in the draft plan/SEIS, and the validity of this data, including data collected from visitor studies. Some commenters felt the incident levels did not warrant greater restrictions, while other commenters felt these levels were low, due to unreported incidents. Many commenters reference the law enforcement citations, saying that humans are more dangerous through hostile and illegal behavior, as well as through recreational activities.

Representative Quote(s):

Corr. ID: 488 **Organization:** *Not Specified* **Comment ID:** 351775 **Organization Type:** Unaffiliated Individual
Representative Quote: The law enforcement incident reports from 2008 through 2011 showed that there were 729 incidents reported for having a dog off leash within the Ocean Beach SPPA during the period (July 1 through May15) when dogs must be leashed.

1. This same data (Appendix G) shows the incidents of disturbing wildlife is very low or non-existent, most of the violations are related to leash law.
 2. This same data (Appendix G) shows decreasing number of dog incidents from 2001-2006 before the new leash law 36 CFR 1.5, and then decreasing again From 2007-2011 after the new leash law 36 CFR 1.5
 3. If compliance to current law is poor, why do think a ban of dogs altogether will be well complied with? Most people are very used to walking there dogs there now and will probably continue to do so since there are no other open space alternatives in the area
- The document identifies SPPA as a moderate dog walking area. If thats that case than monitoring and citations could be used to enforce the leash laws.

Corr. ID: 1236 **Organization:** *Not Specified* **Comment ID:** 368761 **Organization Type:** Unaffiliated Individual
Representative Quote: SEIS data still does not support claims that there are major safety problems from dogs that require off-leash restrictions. The total number of dog bites or attacks from 2008 to 2011 (four years) was 95 (p. 21). Even if this number is undercounted and should be tripled or quadrupled, it still represents a miniscule portion of the millions of dog visits each year to GGNRA sites. Even the total number of dog-related incidents (nearly all of which were for having dogs off-leash where they werent supposed to be) from 2001 to 2011 - 4,932 - represent a tiny fraction of the million dog visits each year (p. 252). The vast majority of incidents (at least 89%) e GGNRA involve people without dogs, including murder, rape, robbery, drugs, and larceny. People are the safety problem in the GGNRA, not dogs

Corr. ID: 1489 **Organization:** *Not Specified* **Comment ID:** 352902 **Organization Type:** Unaffiliated Individual
Representative Quote: It sounds by all the information I have read that the studies that have been done in the past have

been skewed. If you look at the number of incidents with dogs (ei dog bites) it is unbelievably few as compared to crimes (violent and otherwise) by adults in these parks. Every way you look at it, adults are more dangerous to each other than dogs every have been or will be.

Corr. ID: 1844 **Organization:** *Not Specified* **Comment ID:** 354338 **Organization Type:** Unaffiliated Individual
Representative Quote: Bicyclists and uncontrolled young children are a far worse safety risk in the GGNRA than dogs - particularly at Crissy Field. Bicyclists and unsupervised children routinely run uncomfortably close to pedestrians, cause collisions and ignore basic courtesy. If the GGNRA wants to increase safety at Crissy Field, it should: (1) either ban bicycles or begin strict ticketing of bicyclists who ride too fast and too close to pedestrians.

Corr. ID: 4546 **Organization:** *Not Specified* **Comment ID:** 360534 **Organization Type:** Unaffiliated Individual
Representative Quote: Incident reports from 2013 show a small number of dog-related incidents within the hundreds of thousands of visits to the GGNRA, much smaller than the number of reported incidents involving people; again, data that does not support the need for such a drastic change nor the request for a staggering \$2 million for more rangers.

Corr. ID: 5227 **Organization:** *Not Specified* **Comment ID:** 362713 **Organization Type:** Unaffiliated Individual
Representative Quote: If there is a problem with dogs within the GGNRA, the NPS dog incident data should contain a record of the issues. Between 2001 and 2011, the GGNRA recorded 4,932 dog-related incidents, or 448/year or less than two per day across all 80,000 acres and 24 dog sites in the GGNRA. The GGNRA sees over 13,000,000 visitors per year and yet only records 448 incidents per year. This is hardly indicative of a problem, and in fact proves that the 1979 Pet Policy works.

Corr. ID: 5403 **Organization:** *Not Specified* **Comment ID:** 363171 **Organization Type:** Unaffiliated Individual
Representative Quote: It is apparent that the vast majority of violations of rules are never reported by visitors or observed by park staff. Naturally, many non-compliant owners change their illegal behaviors quickly upon noticing the presence of park staff. Due to the size of the parks compared to the parks small number of staff a visitor can hike for many hours, even days, without ever coming in contact with park staff. Therefore the incidents in this report should be considered as a small percentage of the overall violations that do occur within a year at the parks.

The non-compliant dog owners listed in the majority (>90%) cidents in the 2009 Criminal Incident record are given a verbal or written warning. The reports indicate that their names are entered into a database and they will be cited for subsequent infractions.

Corr. ID: 6178 **Organization:** *Not Specified* **Comment ID:** 365757 **Organization Type:** Unaffiliated Individual
Representative Quote: I carefully read the section of the report from pages 252-258, which describes many of the reported dog-related incidents. Over a 10-year period, there are reports of about 4000 events, which averages to 400/year or about 30 each month - roughly one each day.

This sounds terrible, but there is no data offered for comparison. What is the incidence of dog-related incidents in a comparably-sized park with comparable volume of visitors, and dogs either not allowed or only allowed on leash? Is it much lower, the same, or much higher? Without any comparative analysis, this data is absolutely meaningless, and is not useful as a basis for a massive change in policy. If the NPS wants to impose a policy change on the GGNRA, and wants to offer data to support this change, the NPS should offer enough data to show that the policy change will have the intended effect. This data does not indicate anything useful about the proposed policy change.

Response: Additional data including visitation patterns and park law enforcement data has been incorporated in the final plan/EIS. Additional law enforcement data are presented in chapter 3, Visitor Use and Experience and Health and Safety. These data were used to update the impact analysis for these topics in chapter 4. While GGNRA cannot provide an exact number of incidents that go unreported, the park is aware that the law enforcement incidents represent only a portion of actual incidents, given that law enforcement is unable to respond to all incidents, and does not patrol every location constantly. In contrast, please see lifeguard data for Stinson Beach and Ocean Beach, where dog violations have been monitored more consistently, and are significantly higher than reported law enforcement data. Nonetheless, although law enforcement data undercounts incidents, the existing law enforcement data, as well as public comment, substantiate a need to regulate dog walking to protect resources, provide for a variety of visitor experiences, and ensure health and safety.

CONCERN STATEMENT: (Concern ID: 53334) Commenters were concerned that the NPS did not adequately analyze where dog walkers would go in surrounding areas if the preferred alternative were selected. Some commenters stated that this

analysis was requested by the San Francisco Board of Supervisors in 2011.

Representative Quote(s):

Corr. ID: 1250 Organization: Not Specified Comment ID: 352069 Organization Type: Unaffiliated Individual

Representative Quote: Have you done an impact analysis on where all the dogs will go if your proposed plan is in place? This could cause over concentration of dog use in dog parks and neighborhood/city parks.

Corr. ID: 1261 Organization: Not Specified Comment ID: 352191 Organization Type: Unaffiliated Individual

Representative Quote: And certainly insufficient study has been done to show the impact to lands from the displacement. These lands could include GGNRA lands where dogs are not being taken (legally or not), other state parks in the area, and of course city parks, which will then be the only remaining legal dog areas that will not be able to cope with increased load.

Corr. ID: 1315 Organization: Not Specified Comment ID: 352295 Organization Type: Unaffiliated Individual

Representative Quote: The plan does not adequately analyze impacts on nearby parks of the Preferred Alternative. This analysis was requested by the public and by the San Francisco Board of Supervisors in 2011. The new plan claims that, because some off-leash space will still be available in the GGNRA, even though much smaller, most people will continue to walk their dogs there and not move to nearby city parks. No evidence is given to support either assumption.

Corr. ID: 2873 Organization: SaveOffLeash.com Comment ID: 357704 Organization Type: Unaffiliated Individual

Representative Quote: Any reduction to on or off-leash dog areas will require dog parents to travel greater distances, convening on fewer spots making the related traffic and parking more congested. Have these impacts been estimated, quantified, evaluated, considered, peer reviewed and publicly disclosed? If so, where is that analysis?

Corr. ID: 3919 Organization: Not Specified Comment ID: 360011 Organization Type: Unaffiliated Individual

Representative Quote: The plan lacks any acknowledgement of its impact on other areas. The GGNRA plan has not adequately studied how dispersion will affect local communities, neighborhood parks, and their preferred dog recreation areas due to overcrowding. I myself do not frequent my city parks with my dog under voice command because they are too crowded, there's not enough room to exercise, and they're not at all relaxing.

Response: NPS conducted a survey in the summer of 2012 to measure customer satisfaction related to dog walking at GGNRA (NPS 2012b). The GGNRA Dog Walking Satisfaction Visitor Study (NPS 2012b) evaluated the perception of and satisfaction with the current dog walking policies, and the potential for redistribution of use based on access changes. Results of this survey were used to determine what other parks (referred to as nearby dog walking areas) the visitors would choose to visit if on-leash or off-leash dog walking was limited as a result of this plan/EIS. Using the results of this survey, a more detailed evaluation of the potential impacts to alternative sites identified in the survey was completed for the draft plan/SEIS. Detailed information regarding natural resources, acreage of off-leash play, parking availability, etc. were incorporated into this analysis, including cumulative impacts as a result of the Significant Natural Resource Areas Management Plan (SNRAMP), which proposes to close/reduce some of the existing dog play areas (DPAs), such as the Lake Merced site, in San Francisco. Additional details on redistributional effects have been added to chapter 4 of the final plan/EIS.

GA3000 - Impact Analysis: General Methodology For Establishing Impacts/Effects

CONCERN STATEMENT: (Concern ID: 53340) Commenters felt that data provided for the impact analysis in the draft plan/SEIS was well cited and scientifically-based.

Representative Quote(s):

Corr. ID: 5026 Organization: Not Specified Comment ID: 362104 Organization Type: Unaffiliated Individual

Representative Quote: Chapter 4 elaborates on these meaningful updates, and includes expanded analysis of park operations budget data. Crucially, Chapter 4 addresses operational issues such as additional fencing and financial impacts. Taken together, these additions provide robust support for both the feasibility and the benefits of implementing the SEIS.

Corr. ID: 5026 Organization: Not Specified Comment ID: 362103 Organization Type: Unaffiliated Individual

Representative Quote: Chapter 3 includes updated law enforcement, visitor use and experience, health and safety impact data. Importantly, it cites authoritative, additional peer-reviewed studies on resource impacts. This science-based data shows the importance of ensuring the availability and health of the GGNRA for the long term. These changes reinforce the future orientation of the Park Services 2011 Draft SEIS as it addresses and balances the needs of people, pets and wildlife for the future.

Response: GGNRA has worked to make the environmental analysis accurate and scientifically-based, and appreciates your comment.

GD1100 - Comments Concerning Guide Dogs

CONCERN STATEMENT: (Concern ID: 53342) Commenters noted that many dogs were being falsely represented as guide dogs. One commenter mentioned that only guide dogs should be allowed in the GGNRA.

Representative Quote(s):

Corr. ID: 156 Organization: Evogeneao **Comment ID: 349888 Organization Type:** Unaffiliated Individual

Representative Quote: Also, the ADA is being grossly abused by dog owners who claim their dog is a 'service dog' and get away with avoiding restrictions everyone else follows for the general good. NPS should clamp down on this abuse.

Corr. ID: 1332 Organization: Not Specified **Comment ID: 352332 Organization Type:** Unaffiliated Individual

Representative Quote: In addition, there is rampant abuse of the "service" dog license/medallion. I see it over and over again - people claim their pet is a "service" dog, but then do not follow any of the service dog requirements/rules

Corr. ID: 1909 Organization: Not Specified **Comment ID: 354524 Organization Type:** Unaffiliated Individual

Representative Quote: There is no place for dogs in our parks, except guide dogs.

Response: Banning dogs except guide dogs from GGNRA would not meet the objectives of the dog management plan including providing a variety of safe, high-quality visitor use experiences. These visitor use experiences include having areas where dogs are allowed.

CONCERN STATEMENT: (Concern ID: 53343) Commenters who trained guide or service dogs noted that these dogs need places to run and release their energy in order to be successful working dogs; they noted that the GGNRA was an important place for this activity.

Representative Quote(s):

Corr. ID: 3222 Organization: Not Specified **Comment ID: 357994 Organization Type:** Unaffiliated Individual

Representative Quote: Time with dogs is proven to reduce depression and add longevity as we age. Service dogs that provide comfort in hospitals enhance patient well-being. It is also proven that these type of service dogs need their recovery time, in order to serve another day. How do dogs recover? By running, playing and being free. That requires open trails, beaches and Off-Leash, controlled areas in nature - a dogs natural habitat

Corr. ID: 3232 Organization: Not Specified **Comment ID: 358002 Organization Type:** Unaffiliated Individual

Representative Quote: I'm someone who walks twice daily with my designated service dog in the Rancho Corral de Tierra (Montara) section of GGNRA. When he is exercised, he is calm and can be in therapy mode/perform his service duties. But if he were forced to stay on leash, there is no way he'd get the exercise he needs - - and would therefore not be calm enough to perform the services he is trained for. I moved to Montara 12 years ago for the specific purpose of being able to exercise my therapy dog off leash within walking distance from my house.

Corr. ID: 4538 Organization: Not Specified **Comment ID: 360493 Organization Type:** Unaffiliated Individual

Representative Quote: My service dog & I really need for our therapy Space to be available for us to continue our treatment

Corr. ID: 5373 Organization: Not Specified **Comment ID: 354494 Organization Type:** Unaffiliated Individual

Representative Quote: I regularly take my service dog to many GGNRA trails and beaches here.

This is the third dog that I am training for search and rescue work and she NEEDS to run while under control in areas that allow this. We simply cannot just train at Rodeo Beach!

Response: The final plan/EIS includes designated areas at each site for on-leash dog walking. In addition, many sites include VSCAs for off-leash dog walking. Service dogs will still have the opportunity to run and release energy within GGNRA so that they can continue to be successful working dogs. Otherwise, actual guide or service dogs assisting their owner must already be able to perform a particular task to assist, not be considered 'in-training.'

CONCERN STATEMENT: (Concern ID: 53344) Commenters mentioned the issues of guide dogs being attacked or

interfered with by off-leash dogs. One commenter stated that the GGNRA did not provide enough data on these attacks, and that therefore this did not warrant changes. Another commenter expressed concern with the number of guide dogs being attacked in the GGNRA.

Representative Quote(s):

Corr. ID: 4359 **Organization:** *Not Specified* **Comment ID:** 363802 **Organization Type:** Unaffiliated Individual

Representative Quote: The report includes a section that makes some statements about how the policy change is needed in order to reduce the incidence of unleashed dogs attacking guide dogs. This section does not include any data or evidence that there are an unusual number of unleashed dogs interfering with or attacking guide dogs. In the absence of any data or evidence, there is no basis for imposing a change in policy.

Corr. ID: 6333 **Organization:** *Not Specified* **Comment ID:** 365625 **Organization Type:** Unaffiliated Individual

Representative Quote: I am at Crissy Field multiple times a week at various times of the day and evening and almost never see Guide Dogs for the Blind training there. I know some people with guide dogs and also service dogs who need to let their dogs get off leash play time and exercise. So just because the (The Seeing Eye Guide 2011, 6) reference projects this fear, people with these working dogs need to be able to exercise their dogs and the GGNRA is a good place for them.

Corr. ID: 6678 **Organization:** Wild Equity Institute **Comment ID:** 369612 **Organization Type:** Non-Governmental

Representative Quote: Off-leash dogs pose a particularly significant challenge to individuals who rely on service animals

to help them enjoy the GGNRA. As stated in previous comments to the Park Service on this issue, a 2003 survey conducted by a national guide dog user group indicated that 89% of individuals with service animals had their guide dogs interfered with by off-leash dogs, and 42% of graduates of the groups training programs had their guide dogs attacked by off-leash dogs(6).

Thus, the failure to enforce the leash law in the GGNRA has exposed those with service animals to a high-risk of interference or attack, and in most cases has precluded these individuals from enjoying the park altogether. This is a disproportionate impact on accessibility for individuals who rely on guide dogs to traverse the park: and since dog management and accessibility planning will impact many of the same locations within the GGNRA, if this disproportionate impact isn't addressed the GGNRA may unwittingly exclude guide dog users from the very places that it is trying to make accessible.

Response: The dog plan and final plan/EIS will address in several ways: it will clarify that dog walkers are responsible for ensuring that their dog does not have contact with another visitor or dog if not invited. There will also be more area separations as well as demarcated and signed on-leash areas, distinct from off-leash areas which will allow greater opportunities for guide dogs to not encounter or be interfered with by off-leash dogs. Any such interference would also be grounds for a citable violation under the new rule.

GR2010 - Geologic/Soil Resources: Affected Environment

CONCERN STATEMENT: (Concern ID: 53345) Some commenters stated that off-leash dogs are known to dig in sands and sensitive soils and trample the lands adjacent to trails, increasing erosion. Other commenters feel that nature (e.g., wind erosion, gophers) cause more damage to soils than dogs.

Representative Quote(s):

Corr. ID: 5000 **Organization:** *Not Specified* **Comment ID:** 361906 **Organization Type:** Unaffiliated Individual

Representative Quote: The accusation that dogs dig up the lawns is incorrect...actually they may dig at the holes that the gophers make, but I have never seen a dog dig a hole in a lawn that is not already dug up by gophers.

Corr. ID: 6639 **Organization:** *Not Specified* **Comment ID:** 405832 **Organization Type:** Unaffiliated Individual

Representative Quote: Ft. Funston and all other Headlands: This cliff and beach area is more remote and more suited to less disturbing waterfront recreation, it still presents... trampling damage to native plants and chasing of bird life in fields and beaches,

- places hikers and equestrian recreation in constant unwelcome and often volatile surprises on trails from dogs allowed to get ahead complacent owners,
- expends too much public money to secure safety and rescue from falls off of cliffs
- compromises sensitive cliffs from even more rapid erosion.

Off Leash dog use must be confined to the most common sense remote areas of Ft. Funston and all other Headlands regardless of size. All trails whose sides cannot be fenced must be for Dogs On Leashes Only. Enforcement of beach and trail use must be strictly enforced.

Map 16-C closes illustrates an acceptable compromise with the EXCEPTION that the inland off-leashes area and next to the parking lot MUST BE REMOVED and allow for dogs to be released ONLY when they get to the beach. More sensitive trails must be removed and ON-leashes until they arrive completely down the trails to the beach is acceptable.

Map 16-D is preferred, but it would be hell frozen over to enforce.

Response: There are no scientific studies or monitoring studies that we have found which describe the impacts to soils, particularly as a result of dogs. There are general observations of such dog activities (digging, trampling) and an understanding that dog waste/nutrients affects soils, but this impact has been difficult to isolate or quantify without more specific studies. After further consideration, NPS determined an analysis of impacts to soils should be dismissed (please see chapter 1 for the complete discussion). Impacts from dog walking to soils can affect vegetation through compaction, etc. and these impacts are discussed in the vegetation section of chapter 4, as applicable (dunes, coastal scrub/chaparral).

GR4000 - Geologic Resources: Impact Of Proposal And Alternatives

CONCERN STATEMENT: (Concern ID: 53346) Commenters state that the management plan is contradictory in its rationale and allowances in specific areas, such as restrictions of on-leash dog walking on the compacted trail at Oakwood Valley and the allowance of off-leash dog walking at Little Beach hillside trails.

Representative Quote(s):

Corr. ID: 223 Organization: *Not Specified* **Comment ID: 350139 Organization Type:** Unaffiliated Individual

Representative Quote: Your proposed policies are in contradiction to the conclusions you draw in the study. To wit, you conclude that dogs have minimal impact on compacted trails. On the south loop of the Oakwood Valley Trail, where the GGNRA plans to mitigate dogs off-leash, the park service built a compacted trail (built by the Conservation Corps.)

Corr. ID: 369 Organization: *Not Specified* **Comment ID: 351274 Organization Type:** Unaffiliated Individual

Representative Quote: In the NPS's "preferred alternative" for Muir Beach, leashes would be required on Big Beach. The NPS's justification for the workability of such a change is that Little Beach is there for all who want to let their dogs run. From an environmental standpoint, we are concerned for the continued erosion of the hillside trails and the potential increase of dog waste left at these trailheads.

Response: VSCAs on trails and fire roads was considered but dismissed for all action alternatives in the final plan/EIS, with the exception of a portion of the Oakwood Valley Fire Road, an area of consensus from the Negotiated Rulemaking, and a small area within Ft. Funston. Further information can be found in chapter 2, Alternative Elements Eliminated from Further Consideration. Little Beach is outside GGNRA's jurisdiction and not within the scope of the dog management plan

CONCERN STATEMENT: (Concern ID: 56079) Erosion occurs at Fort Funston due to weather and natural processes. The draft plan/SEIS states false claims that erosion is due to dog activity without scientific evidence that this is actually occurring.

Representative Quote(s):

Corr. ID: 6716 Organization: San Francisco Dog Owners Group **Comment ID: 499770 Organization Type:** Unaffiliated Individual

Representative Quote: On p. 1345, the SEIS says: "Portions of Fort Funston have been heavily impacted by intense dog use, particularly where there is accelerated erosion from natural forces of the geologic resources, At this site, the impacts of dog walking are exacerbating the ongoing erosion that is caused by the weather and natural coastal processes." However, the SEIS includes no site-specific evidence to back up this claim.

Response: Erosion can be caused by many factors, chief among them weather and natural processes in a coastal environment. Such processes can be accelerated by human-caused factors, including the digging up or trampling of native plants which anchor a coastal area. There are no scientific studies or monitoring studies that we have found which describe the impacts to soils, particularly as a result of dogs. There are general observations of such dog activities (digging, trampling) and an understanding that dog waste/nutrients affects soils, but this impact has been difficult to isolate or quantify without more specific studies. After further consideration, NPS determined an analysis of impacts to soils should be dismissed (please see chapter 1 for the complete discussion). Impacts from dog walking to soils can affect vegetation through compaction, etc. and these impacts are discussed in the vegetation section of chapter 4, as applicable (dunes, coastal scrub/chaparral).

HS2010 - Health and Safety: Affected Environment

CONCERN STATEMENT: (Concern ID: 53347) Many commenters recognize that there are many responsible dogs owners with well-behaved dogs that visit Golden Gate National Recreation Area; however, they are affected by off leash dogs that are not under voice control. Commenters are concerned about the affects the off-leash dogs have on wildlife and habitat, as well as other park visitors. Commenters noted that the behaviors of some dogs limit or prohibit the areas that other visitors can go to recreate, as they fear being harassed by off leash dogs. Additionally, many commenters reported confrontations from hostile dog owners and commercial dog walkers. Commenters argue that the park should be a place for people to recreate first and foremost without fear of being bothered by off leash dogs.

Representative Quote(s):

Corr. ID: 3391 **Organization:** *Not Specified* **Comment ID:** 358314 **Organization Type:** Unaffiliated Individual

Representative Quote: An important reason why people visit parks is the serenity and beauty there. Many dog owners are respectful of others and many dogs are well-trained. But San Francisco also has its share of irresponsible dog owners, and out-of-control dogs. This can be a threat, not only for our varied wildlife, but also for our citizens, especially children and seniors. Also the presence of too many dogs degrades the natural environment of the park. We all deserve a place where we can relax and enjoy our precious coastline without being disrupted by unruly dogs and their natural instincts to chase after wildlife - or people

Corr. ID: 4118 **Organization:** *Not Specified* **Comment ID:** 362044 **Organization Type:** Unaffiliated Individual

Representative Quote: Improve visitor and employee safety, and Reduce user conflicts

These two goals are closely related, and heavily impacted by the current dog use practices. We have witnesses numerous incidents of close calls where children and adults were put in harms way by reckless, out of control dogs that were clearly in sight of their owners, who chose to do nothing. We have been accosted by dogs while trying to sit and enjoy a snack on the beach, twice in just the last few weeks, once at Stinson and again at Muir, both under relatively uncrowded conditions, due to the obvious negligence of the dog owners. Maybe they had "voice control", and chose not to exert it, or maybe they really did not have control. Their owners were oblivious, taking no action, as is observed to be the case the majority of the time. A month ago, we witnessed a man carrying a baby being nearly knocked over by a dog running full speed back and forth across the bridge at Rodeo Beach, again to no reaction by the apparently oblivious owner of the dog. The lack of enforcement of rules and current practices are putting all users and the NPS at elevated risk of injury and conflict, and putting the NPS at greater risk of liability for fostering user conditions that have clear and preventable hazards like out of control dogs.

Corr. ID: 5965 **Organization:** *Not Specified* **Comment ID:** 364821 **Organization Type:** Unaffiliated Individual

Representative Quote: As a senior diagnosed with osteoporosis, I am constantly fearful of being knocked over by dogs running at large in areas where they are supposed to be leashed or are not allowed at all. So many of my favorite beaches and parklands are now areas I am forced to avoid due to the impacts of dogs off-leash. I fully understand why people like to run their dogs off-leash but it should not be at the expense of other parkland and beach users.

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 366031 **Organization Type:** Unaffiliated Individual

Representative Quote: Notably, the American Veterinary Medical Association's Task Force on Canine Aggression and Human-Canine Interactions clearly states that dog bites represent a demonstrable threat to communities and that dog bite prevention requires (1) acknowledgement of the issue, (2) clear and deliberate action to prevent bites, and (3) a transparent and credible reporting process for interactions. The AVMA specifically concludes that "[r]easonable and enforceable laws or ordinances are required for good control of unrestrained or free-roaming animals..." in order to prevent bites.

Moreover, as discussed above, non-dog owners should be given a choice before interacting with off-leash dogs. A non-dog owner will have no legitimate grounds for complaint if he or she interacts with a dog in an appropriately enclosed ROLA. Complaints to this effect should decline considerable.

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 366917 **Organization Type:** Unaffiliated Individual

Representative Quote: But it is not just park flora and fauna that are negatively impacted by pets. On several occasions as I have hiked in national parks or strolled along a park beach (more often than not where pets are

prohibited, but also frequently in areas where they are at least required to be on leash), I've encountered off-leash dogs running out-of-sight of and well ahead of their owners, and frequently out of earshot. A number of these dogs have charged me, and many have made contact. So far, I have been fortunate and have not been bitten or injured. The same cannot be said for many of my friends or their pets which were on-leash. When I politely try to inform the dog's owner of the park regulations pertaining to pets, the owner more often than not interrupts me and generally is downright rude, making comments such as "Mind your own business" or "Go home." My friends relate similar stories. Granted, many pet owners are responsible and do not take their dogs where they do not belong, but it seems as though many of the pet owners who take their dogs to national parks are not amongst the ranks of the responsible or courteous. I grew up with dogs and am therefore familiar with them and know how to react to the dogs charging at me, but it still is not a comfortable situation to be in -not knowing whether the dog will actually attack or not. And for those who are unfamiliar with or afraid of dogs, such encounters are terrifying.

Response: The analysis of visitor use and experience includes impacts to visitors who may feel harassed by off-leash dogs. Please see chapter 3, Visitor Use and Experience for more details. The dog management plan and final plan/EIS also institute a Monitoring Management Program to better monitor and manage impacts from dog walking.

CONCERN STATEMENT: (Concern ID: 53348) Dog waste is a large issue about which many commenters are concerned. Feces that is not disposed of properly and urine can create odors and present health threats. The presence and smell lessen many commenters' experiences in Golden Gate National Recreation Area and reduce the area where many choose to recreate.

Representative Quote(s):

Corr. ID: 1002 **Organization:** Not Specified **Comment ID:** 351023 **Organization Type:** Unaffiliated Individual

Representative Quote: It is too bad that dogs spread diseases, such as the recently reported outbreak of distemper in the Tam Valley neighborhood, and are generally hard on the environment.

Some owners are good about cleaning up after their dogs, but others think that dog poop is biodegradable and so it is "OK" to leave or throw into the creek, with or without bags. They don't realize that not only diseases, but parasites and medications are spread throughout the environment every time a dog leaves poop behind. Not only that, but the scent will linger and encourage other dogs to mark the same area.

Corr. ID: 5664 **Organization:** Not Specified **Comment ID:** 364095 **Organization Type:** Unaffiliated Individual

Representative Quote: Asking the public to share sandy beaches with dogs that are defecating and urinating on a constant basis goes against all of the historical norms of prudent public health and safety standards. No responsible parent would allow their child's school playground to be turned into a off leash dog park. In fact, state law prohibits this. Why should it be any different in public parks? People and their children use the sandy beaches for many activities that involve close contact with the sand on bare skin. In fact that is one of the joys of beach recreation, feeling the warm or cool sand on your body while you listen to the sounds of the surf or birds or nothing at all. Allowing dogs and their owners, whether leashed or unleashed, to freely cover the beaches with urine and excrement (some of which gets picked up and some that doesn't) flies in the face of commonly held public expectations for clean, safe and secure beaches.

Response: The park recognizes this and the final plan and final plan/EIS will underscore and monitor dogwalker's responsibilities in this regard, as well as better demarcate dogwalking areas and increase dog free areas in the park. The health and safety section has been revised to include additional studies regarding dog feces and urine. Please see chapter 3, Human Health and Safety for more details. Comments noted on the presence and smell of dog waste in revised chapter 3, Visitor Use and Experience.

HS4000 - Health and Safety: Impact of Proposal and Alternatives

CONCERN STATEMENT: (Concern ID: 53350) Commenters are concerned about the repercussions of limiting the areas where off leash dogs are allowed. When dogs are forced into smaller spaces, especially fenced-in spaces, stress levels can increase due to confinement. Commenters feel that this could lead to a dog population in San Francisco that is less social, less exercised, and more aggressive, ultimately leading to more incidents between dogs and between dogs and people. Additionally, restricting dog owners to smaller spaces will degrade these areas and other community parks and would worsen the park experience for dog owners.

Representative Quote(s):

Corr. ID: 1007 **Organization:** Not Specified **Comment ID:** 351414 **Organization Type:** Unaffiliated Individual

Representative Quote: The SEIS does not adequately address the environmental and social impact of forcing large numbers of people and dogs into much smaller areas. Reducing the amount of area available for off-leash will significantly degrade the park experience for people with dogs. It will increase conflicts

Corr. ID: 2195 **Organization:** *Not Specified* **Comment ID:** 353200 **Organization Type:** Unaffiliated Individual

Representative Quote: I urge you to consider the long-term impacts of dramatically raising the activation energy of hundreds of families and individuals in the city in order to get them to go outside with their dogs. Increased traffic congestion, number of cars in the city, and a less fit, obese population are all obvious long term side effects of this excessive and poorly thought out plan.

Corr. ID: 4788 **Organization:** *Not Specified* **Comment ID:** 361533 **Organization Type:** Unaffiliated Individual

Representative Quote: The plan lacks any acknowledgement of it's impact on other areas. The GGNRA plan has not adequately studied how dispersion will affect local communities, neighborhood parks, and their preferred dog recreation areas due to overcrowding. The need for open space areas for dogs is important not only for the health of the dog, but to maintain adequate space between dogs. Limiting this open space will therefore result in overcrowding of dogs in the dog parks - leading to unfortunate situations of more aggression and a less relaxed atmosphere.

Corr. ID: 5511 **Organization:** SuperDog City, LLC **Comment ID:** 363889 **Organization Type:** Unaffiliated Individual

Representative Quote: Not to mention that dog outnumber children in San Francisco, the GGNRA is proposing that the other 90% of people essentially "stack" their dogs on top of one another at the specific parks that sanction. This will create FAR MORE PROBLEMS in the community. As a professional dog walker and business owner since 2005, the negative ramifications far outnumber the reasons to pass along their plan. The analogy can be made for people as it is for dogs, the less "space" in a park, the more agitated people and or dogs may become. Dogs do not have the same reasoning and decision making we do, and therefore dogs will become more territorial and dog fights will become epidemic. Not only dog fighting, and barking creating constant noise problems for local residents, but all fights may lead to humans be injured.

Response: Six GGNRA sites would continue to provide a total of eight VSCAs, including a newly established VSCA at Fort Mason and Flat Top in Rancho Corral de Tierra. None of the 21 park areas in this final plan/EIS would prohibit dogs under the preferred alternative; and, commercial dog walking would be allowed, as previously discussed. The monitoring program will assist in identifying if/when an area is getting too crowded. The health and safety impact analysis includes an analysis of impacts to dog health. In addition, the final plan/EIS includes a detailed analysis of impacts to nearby dog walking areas including the potential for redistributive effects. Overall, approximately 1/3 of all beach and trail miles would still be available for dog walking.

CONCERN STATEMENT: (Concern ID: 53351) Commenters believe that off leash dogs should be separated from other visitors, especially children and the elderly, by barriers or fencing. There is a negative impact on children participating in urban environmental education programs in areas where there are many off leash dogs. Commenters are concerned about dogs under voice control not being responsive to their owners or walkers around other park visitors. Several of these commenters have refrained from going to certain areas of the park due to the high numbers of dogs. Several commenters were specifically concerned about the off leash area proposed near the Farallone Elementary School. Voice control should not be considered as an option for use in any area of the GGNRA that is open to multiple visitor uses.

Representative Quote(s):

Corr. ID: 5 **Organization:** *Not Specified* **Comment ID:** 337956 **Organization Type:** Unaffiliated Individual

Representative Quote: I would like to voice my support for Crissy Field maps 10f and 10c. These two maps achieve two important objectives: 1. It leaves a large area where dogs can run around off leash (ROLA) on both the field AND a long stretch of beach. Dog walkers should be able to enjoy sizable areas of the beach and field as ROLA. 2. It preserves East Beach for a place for young children and families free of dogs. East Beach is the most used area of Crissy field. My own daughter was run over and left with a bloody nose by a dog chasing a ball. Her twin sister had stepped in dog feces that same trip. The fact is that part of the beach is too heavily impacted as it is. Removing the dogs and creating a safe stretch of beach free of dogs is a fair thing to do for families.

Corr. ID: 70 **Organization:** *Not Specified* **Comment ID:** 338959 **Organization Type:** Unaffiliated Individual

Representative Quote: I very strongly oppose Alternative C. Frankly, I am shocked to see that an "off-leash" dog park is being proposed for the area between Tamarind and Le Conte streets. As noted in the plan, this area is right across the street from an elementary school!!! It would be quite dangerous for small school children to encounter off-leash dogs just across the street from their play ground! As voice control is ineffective for most dogs, there would be a high risk of injury to children. In addition, there are homes along Tamarind Street that would now have an "off-leash" dog park,

literally in their front yard!! Again, this seems untenable in terms of potential dog attacks to the people who live on this street. (I live on this street!). Also, it seems highly likely that off-leash dogs would easily run into and damage the yards of these homes and the grounds of the Farallone View Elementary School.

Corr. ID: 108 Organization: Not Specified Comment ID: 343886 Organization Type: Unaffiliated Individual
Representative Quote: Many years ago, I used to go regularly to Rodeo Beach. It was my favorite place of relaxation and recreation.

At a certain point the number of dogs present increased dramatically. On one occasion, I arrived in the area near the cliffs on the southern end of the main section of beach, to find that the entire beach smelled like dog feces, something I had never noticed prior to this. I lay down where I usually did to relax in the sun. About 10 minutes later a large brown dog came running at high speed directly into me. One of the dogs sharp nails went into my leg, causing a wound which bled for minutes. The owner of the dog was a young man nearby who saw what happened and was very apologetic. In retrospect it made no difference whether the owner was nice or not - the over enthusiasm of a dog of this sort cannot be controlled. The bad smell and injury caused me to leave. I went to the ranger's office and spoke with a ranger, complaining that dogs were ruining the beach and that I had been injured. He said large numbers of dog owners brought their dogs there because it was one of the few beaches where they were allowed to do so, and he suggested I send a comment to the managers.

I have never returned to Rodeo Beach, and as long as dogs are allowed there with their attendant dangers and stink, I will not return. I have recommended to others that they not go there - the place smells polluted with feces and the dogs are dangerous. THE ELEPHANT IN THE ROOM in these negotiations is that EVERYBODY, including dog owners, knows there is no way to have an arrangement of any type which is safe and sanitary for human visitors, as long as dogs and humans are allowed to be in the same place at the same time.

Corr. ID: 359 Organization: Not Specified Comment ID: 351133 Organization Type: Unaffiliated Individual
Representative Quote: am writing to you in much distress because of the ongoing dog situation at Crissy Field. Let the dogs have some portion of the field or designate some more remote park for their use. Crissy Field is a heavily used Park and it is insane and unsafe to allow the current situation to continue.

Corr. ID: 724 Organization: Not Specified Comment ID: 353051 Organization Type: Unaffiliated Individual
Representative Quote: I would like to report that I was running on Ocean Beach this morning (at around 45th Ave). A dog, off leash, came up from behind me and jumped on my back. His owner was about a quarter of a block away. Frightened, it was a medium to large sized dog, I started screaming for her to get her dog away from me - the dog was continuing to jump on me and was growling. I turned my back to the dog and remained still(although I kept yelling at the lady to get her dog), as this is not the first time this has happened to me on this stretch of the beach, and experience has taught me not to continue running, to remain still and to turn my back to the dog.

The owner proceeded to lash out at me - asking me why I was being so nasty while her dog continued to jump on my back and growl at me! Several unpleasant "French" words were exchanged, but the upshot was that she felt it was my fault. Luckily, I was not harmed, but just shaken up a bit by this encounter and certainly by her response.

Human nature baffles me as her dog clearly ran after me and assaulted me on an area of Ocean Beach in which dogs are to be kept on leashes. Then to add insult to injury, the owner of the dog attributes the problem to be me! It's quite laughable, really.

As I said this is not the first time this has happened to me, but I am certainly not going to stop running on the beach and so I hope that a dog plan will be put in place and enforced that will allow dogs the freedom to run off leash in certain areas while affording that same freedom to humans so that they can run unharmed.

Response: Dog free areas have been established throughout the park, including where there have been such conflicts in the past such as the Funston environmental education center, as well as picnic areas and specific beaches and trails. Visitors with children who are frightened by dogs can access these areas which will also be signed. Locations where dogs are not allowed at each site are depicted on the maps within the final plan/EIS, and will be at both visitor centers and each park area. The dog management plan requires dog walkers to demonstrate the ability to control their dog under voice and sight control when requested to do so by an authorized person. The VSCA proposed in the draft plan/SEIS adjacent to the Farallone View

School specifically was discouraged by multiple public commenters, including the school, due to potential impacts; therefore, this VSCA is not moving forward in the preferred alternative.

CONCERN STATEMENT: (Concern ID: 53352) Several commenters are concerned about the leash requirements in certain areas that they see as unsafe for leashed dogs, such as Big Beach at Muir Beach and the sand ladder of Fort Funston. Commenters state that leashes in these areas could endanger the walkers who must control the dogs in unstable settings or could possibly strand the dogs and owners during high tide.

Representative Quote(s):

Corr. ID: 369 **Organization:** *Not Specified* **Comment ID:** 351273 **Organization Type:** Unaffiliated Individual

Representative Quote: In the NPS's "preferred alternative" for Muir Beach, leashes would be required on Big Beach. The NPS's justification for the workability of such a change is that Little Beach is there for all who want to let their dogs run. From a safety standpoint, we are concerned that visitors will cross over to access Little Beach and become stranded during high tides, then try to unsafely cross over the rocks to get back to "Big Beach", creating more incidents for our emergency services.

Corr. ID: 3930 **Organization:** *Not Specified* **Comment ID:** 360075 **Organization Type:** Unaffiliated Individual

Representative Quote: For example insisting to have dogs on leash on the steep slopes of Funston, including the southern sand stairs. This will be extremely dangerous for the feeble, the elderly and any one else who finds traversing such terrain difficult-even without being jerked around by a dog who traverses the stairway with four feet instead of two. Adding a LEASHED dog in such an environment is not only extremely dangerous, it lacks common sense. Falling down stairs as a result of being jerked from a dog on a leash is not only dangerous to the dog owner but to other people on the sand stairs. A stairway that often is overcrowded with families including small children.

Response: Visitors who feel unsafe walking dogs on-leash within certain areas have the opportunity to walk dogs both on-leash and off-leash in other designated areas. Although some visitors may feel it is unsafe having an on-leash dog on the Sand Ladder or Big Beach, other visitors may find it unsafe to recreate in these locations with off-leash dogs. Dog management training is encouraged for all dog walkers who have not had it to ensure that they not only manage their dogs effectively but also can safely walk them. Training from national associations such as Canine Good Citizen training, which was recommended by a GGNRA dog walker in public comment, is offered thru the AMC kennel club and an example of one such excellent training.

CONCERN STATEMENT: (Concern ID: 53353) Off leash dogs are a considerable concern for many commenters who expressed the desire to have dogs leashed in all areas of the park or banned entirely. Commenters are unhappy about unruly dog behavior, dog waste and bags, hostile dog owners, and disturbances to wildlife and habitat.

Representative Quote(s):

Corr. ID: 192 **Organization:** *Not Specified* **Comment ID:** 350075 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a resident of the Homestead Valley area of Mill Valley for over 17 years. I leave next to the Homestead Fire Rd as drawn on MAP 3.

I use the fire road on a weekly basis and STRONGLY BELIEVE THE DOGS NEED TO BE ON LEASH OR BANNED ALTOGETHER FOR THE FOLLOWING REASONS:

1. I have been bitten by a dog. The dog was not on a leash or under voice control.
2. Dog walkers routinely walk 4 dogs who are rarely on leash. I see these dogs run wild disturbing hikers, families, bike riders, local wildlife (Rabbits,birds, etc.), digging/crush native vegetation, and defecating on the trail.
3. I routinely see "plastic poop bags" on the trail unclaimed - unsightly and unsanitary.
4. I have seen dog on dog clashes. I get concerned the dogs may then turn on a human - adult or child

Corr. ID: 508 **Organization:** *Not Specified* **Comment ID:** 351836 **Organization Type:** Unaffiliated Individual

Representative Quote: This comment is for the Homestead Fire Road in Homestead Valley.

I support Preferred Alternative F - Dogs on Leash because:

1. I am a resident of the area and use the trail frequently. I have been bitten by a dog on this trail and fear for my safety every time I see a dog on the trail. I have frequently been approached by barking/growling dogs not on-leash or under

voice control.

2. Commercial dog walkers use this trail and typically have 3-6 dogs not on leash and not under voice control (dogs running loose and bothering people (other animals/vegetation). I have also been harassed by commercial dog walkers who feel they have control of the space and can do what ever they want.

Corr. ID: 6474 **Organization:** *Not Specified* **Comment ID:** 368829 **Organization Type:** Unaffiliated Individual
Representative Quote: Off-leash dogs can be a serious safety risk and are a huge disturbance to the increasingly smaller numbers of wildlife that remain in the GGNRA. There is no easy way to balance human pets and wildlife in the GGNRA, but the scientific evidence presented by the National Park Service and independent experts clearly point to the conclusion that dogs must be on leash or excluded from any GGNRA area where endangered and threatened wildlife and their habitat, plus native plants, have been documented.

Response: The dog management plan offers opportunities for a range of visitor uses and experiences throughout the park while protecting park resources. There are many areas designated for no dogs or on-leash dog walking for visitors who do not enjoy recreating around off-leash dogs. Most VSCAs will have established demarcated landforms and/or fencing separations that will reduce the number of off-leash dogs from entering into non-VSCAs.

CONCERN STATEMENT: (Concern ID: 53355) Commenters, including those that do not own dogs, noted the constant presence of dogs and dog walkers as an enhanced safety measure. Many commenters, especially the elderly and women, feel safer when walking with their dogs, as the dogs provide protection from wildlife and potentially ill-intentioned people. Prohibiting dogs on trails may exclude people, especially women, from recreating in these areas because they do not feel safe on the trails by themselves.

Representative Quote(s):

Corr. ID: 247 **Organization:** *Not Specified* **Comment ID:** 350347 **Organization Type:** Unaffiliated Individual
Representative Quote: I do not own a dog, I have never owned one. But I can remember when these areas were unsafe for women, Ft Funston at any time. It was the dog walkers who came and took back this park area from the bums and drug dealers, not the GGNRA police or park rangers. It has been the dog walkers who have kept this a safe place for me to walk. There is so much space in the GGNRA - I ask that you do the right thing and give the off leash dog walkers more land. There are more dogs than children in San Francisco. For many people these dogs are their family who keep them active and therefore mentally and physically healthy. Ideally, all GGNRA would be dog friendly. If you can allow guns and ATVs in Federal parks, dogs should be able to walk off leash.

Corr. ID: 1429 **Organization:** *Not Specified* **Comment ID:** 352535 **Organization Type:** Unaffiliated Individual
Representative Quote: As a woman who frequently hikes alone during the week, many times, the only other people I see on the trails are other folks walking their dogs. When you take that user group out of the mix, it feels LESS SAFE. This was the case when many former off leash sites in SF became leash only. Suddenly, no one was there. The regular folk disappeared who'd been daily walkers.

Corr. ID: 1520 **Organization:** *Not Specified* **Comment ID:** 352978 **Organization Type:** Unaffiliated Individual
Representative Quote: Frequently, I visit a park to find only dog-people and maybe joggers. Joggers race by, often with ear-buds, internally focused. Dogs and their people walk slowly and pay attention. By doing this, they make the parks safer for everyone - especially lone older hikers like me.

Corr. ID: 1682 **Organization:** *Not Specified* **Comment ID:** 353557 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs provide a sense of security to their companions. I like to run or walk alone with my dog. Many of the GGNRA trails (i.e. Sweeney Ridge) are in areas far away from neighborhoods and where normally there are few people.

Corr. ID: 4081 **Organization:** *Not Specified* **Comment ID:** 353606 **Organization Type:** Unaffiliated Individual
Representative Quote: It is also worth noting that parks that allow off-leash recreating make those parks safer for everyone. People with dogs visit these parks rain-or-shine, day-or-night, because dogs always need to be exercised. That means there's always someone in the parks and solo people out for walks or jogs are safer for it, because they aren't alone.

Corr. ID: 4584 **Organization:** *Not Specified* **Comment ID:** 360983 **Organization Type:** Unaffiliated Individual

Representative Quote: It is also important to me that my wife and children have a safe place to go when I am traveling. The presence of other dog owners and professional dog walkers adds a critical element of safety to these areas. People walking their dogs are alert to things that do not look right and are always quick to help others at the park.

Corr. ID: 4596 **Organization:** *Not Specified* **Comment ID:** 361119 **Organization Type:** Unaffiliated Individual

Representative Quote: The other safety argument is that women, in particular, feel safer when with a dog. I would not feel comfortable hiking on any trail alone without my canine companion for protection. By banning dogs on many of our trails here in Marin, you are virtually cutting off access to women, many of whom would stop using the trails if they couldn't bring their dog.

Response: Safety is of paramount importance in GGNRA. Under the preferred alternative, a wide variety of recreational options exist, including areas for dog walkers (approximately 1/3 of all beach and trail miles). The analysis of the safety measures associated with walking dogs is included in chapter 4, Human Health and Safety. Please see this section for more details.

CONCERN STATEMENT: (Concern ID: 53356) Walking dogs off leash provides many people in San Francisco with opportunities to exercise, stay healthy, and socialize. In a crowded city such as San Francisco, dogs need areas to exercise in order to release pent up energy. Commenters fear that a more restrictive area where dogs are permitted would cause a decline in their own health, as well as that of their dogs. In addition, dog owners and dog walkers feel a sense of community with others they meet on regular visits to exercise their dogs. Several commenters who do not own dogs relate that watching dogs run on the beaches is part of the enjoyment of California parks. Many commenters believe that these opportunities create stronger, safer communities and improve the lives of people and dogs. The discussion of the benefits to dog walking in the draft plan/SEIS are not sufficient.

Representative Quote(s):

Corr. ID: 1268 **Organization:** *Not Specified* **Comment ID:** 352199 **Organization Type:** Unaffiliated Individual

Representative Quote: Although we don't have a dog we find extreme relaxation and enjoyment from watching other people's dogs happily prancing along the beach. When we are stressed and see the dogs it helps lower our blood pressure and provides a medical benefit both physically and mentally for us.

Corr. ID: 1613 **Organization:** *Not Specified* **Comment ID:** 353204 **Organization Type:** Unaffiliated Individual

Representative Quote: Many people (like me) depend on their dogs for their day to day companionship and exercise. There is ever-growing science that shows that these animals have a strong, positive influence on the health and well being of this population, and therefore of society as a whole.

Corr. ID: 2366 **Organization:** *Not Specified* **Comment ID:** 358399 **Organization Type:** Unaffiliated Individual

Representative Quote: Dogs aid in the health and well being of all their owners, both young and old, providing exercise and companionship. They are the lifeline for many elderly people. Dog owners are not asking for anything more we just want to keep what we have allowing us to utilize trails and beaches designated for dogs lovers, some allowing our dogs to play freely off leash and get the much needed exercise they also need.

Corr. ID: 2866 **Organization:** *Not Specified* **Comment ID:** 357688 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a senior citizen and I attribute my relative good health to the fact that I walk with my dog at least twice a day every day. It keeps both me and my dog in excellent shape, both physically and mentally. It is a known fact that a well-exercised and socialized dog is a good dog, one that is friendly toward people and other dogs. A dog constantly kept on leash is not a well exercised dog.

Corr. ID: 3129 **Organization:** DogPAC of San Francisco **Comment ID:** 355390 **Organization Type:** Unaffiliated Individual

Representative Quote: I oppose The Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan because... people and their dogs need a safe place to exercise and socialize. Besides the obvious health benefits of outdoor exercise, these areas help bring people together, a chance to know their neighbors and feel connected to their community by sharing a simple and natural common interest.

Corr. ID: 3193 **Organization:** *Not Specified* **Comment ID:** 357962 **Organization Type:** Unaffiliated Individual

Representative Quote: I am not a dog owner, but I think that limiting dog walking to leash-only on trails and beaches

in Marin would significantly decrease quality of life in Marin. I hike extensively in Marin and I've never had an issue with off-leash dogs. To my mind, seeing dogs run off-leash on the beach is one of the great things about California, and I would be sad to see this freedom limited.

Corr. ID: 3323 **Organization:** *Not Specified* **Comment ID:** 358146 **Organization Type:** Unaffiliated Individual
Representative Quote: As a medical professional, I know how important it is - for both physical and emotional health - that people stay active and enjoy the outdoors. Dogs have been shown to improve physical fitness and provide multiple psychological benefits.* Dogs encourage people to get outside, be active, and enjoy this area of natural beauty that has been set aside expressly for that purpose.

Corr. ID: 3930 **Organization:** *Not Specified* **Comment ID:** 360056 **Organization Type:** Unaffiliated Individual
Representative Quote: This is not good for me because I suffer from depression. I am veteran of the armed forces and find great comfort running with my dog, indeed my doctor insists that I continue to run and that my companionship with my dog is healthy and should be maintained. Not allowing me to recreate with my dog directly affects my well-being in a negative way.

Corr. ID: 4689 **Organization:** *Not Specified* **Comment ID:** 361337 **Organization Type:** Unaffiliated Individual
Representative Quote: But beyond this, the fact is, *dogs foster neighborhood community in these spaces*. From the stiffest businessman to the most eccentric animal fanatic, we meet and talk and become friends and better neighbors in these off leash areas. These off-leash areas are the spontaneous town halls of San Francisco's pet owning community.

Corr. ID: 4943 **Organization:** *Not Specified* **Comment ID:** 361802 **Organization Type:** Unaffiliated Individual
Representative Quote: Furthermore, these recreation areas are intended to function as social "steam release valves" to allow residents of a heavily populated Bay Area access to fresh air, quiet, undeveloped scenic land to relax, get exercise, spend time with friends, and enjoy some peace. I respect the National Park Service's commitment to ecological protection, but I know that the Golden Gate National Recreation Area was given over to National Park Service leadership with the agreement that these parks were to remain as recreation areas (which we know serve a different purpose from much-needed nature refuges).

Corr. ID: 5958 **Organization:** *Not Specified* **Comment ID:** 364794 **Organization Type:** Unaffiliated Individual
Representative Quote: The Plan is missing giving appropriate weight to the benefits of dog walking on humans. Those benefits are stated in the report, but nowhere is there a calculation of the benefit thereof in weighing the four alternatives.

Corr. ID: 6215 **Organization:** *Not Specified* **Comment ID:** 366133 **Organization Type:** Unaffiliated Individual
Representative Quote: Limiting access for dogs would also limit access for so many dog owners. For so many people dogs are a huge and enriching part of our lives. Dogs do so much for people with disabilities, people who may suffer from depression, people that may otherwise not make it out of their houses and into the parks. Dogs help people feel connected and can ease anxiety. Walking dogs daily can have great health benefits for dog owners. My dog has got me through some pretty rough times. Enjoying our parks is one of my favorite past times and is an enriching experience and great luxury that I do not want to lose.

Response: The health and safety impact analysis includes how dog walking fosters the health of individuals and community. In addition to off-leash dog walking, on-leash dog walking also presents opportunities for exercising, promotes a healthy lifestyle, and socialization in the community. GGNRA would still provide sufficient areas for dog walkers (approximately 1/3 of all beach and trail miles). Please see chapter 4, Human Health and Safety for more details.

CONCERN STATEMENT: (Concern ID: 53357) There are concerns about the health impacts from pet waste that is not disposed of properly to visitors and other animals. Exposure to contaminated water from dog waste can result in health concerns.

Representative Quote(s):

Corr. ID: 663 **Organization:** *Not Specified* **Comment ID:** 352857 **Organization Type:** Unaffiliated Individual
Representative Quote: Lastly, health is a concern (Foster 2006). Fecal and urine waste can carry pathogens (bacterial, viral, parasitic) that may affect visitors and other animals. The leading cause of illness is from contaminated water. Exposure to contaminated water from dog waste can result in fever, nausea, gastroenteritis as well as flu-like

symptoms. It is well documented that areas with unmanaged and unleashed dogs show a poorer water quality than areas with strong leash laws. A state law already prohibits dogs on public swimming beaches for health reasons. A stricter policy will keep recreational areas even cleaner.

Feral cats and cat colonies are also mentioned. The largest concern is feral cat and bird interactions (Winter; Wallace 2006). However, the plan does not go into detail about what can be done to ensure nonissues with cats nor discuss further into cat colonies. Cat colonies should be kept clean for health reasons as well as the spread of rodents that can carry disease (mice species have been found feeding on food the cats do not eat) and insect pests (such as cockroaches) (Winter; Wallace 2006).

Unmanaged and uncontrolled animals should be taken care of by animal control or park management accordingly

Response: The health and safety section includes studies regarding dog feces and urine. Please see chapter 3 and 4, Human Health and Safety for more details and above actions that the park is taking.

CONCERN STATEMENT: (Concern ID: 53358) The draft plan/SEIS did not properly or adequately analyze human health and safety issues. The adverse impacts regarding health impacts from dog-related incidents are not representative of the actual conditions at Golden Gate National Recreation Area. Commenters feel that the adverse impacts are inflated, as the data are not relevant to the actual condition and are biased against dogs. It was suggested to perform a risk assessment to determine the impacts off leash dogs have on the health and safety of other visitors.

Representative Quote(s):

Corr. ID: 6588 **Organization:** San Francisco Dog Owners Group **Comment ID:** 403958 **Organization Type:** Unaffiliated Individual

Representative Quote: The SEIS, like the DEIS, does not provide an honest evaluation of impacts of dogs on human health and safety. This is particularly true in the SEIS discussion of dog bites.

On p. 35, the SEIS says: Data collected by the Centers for Disease Control and Prevention show that approximately 4.5 million Americans are bitten by dogs each year, and one in five dog bites results in injuries that require medical attention.

This statement is repeated on p. 336, followed by additional information that: Small children are typically the most common victims of dog-related injuries because of their natural behaviors, such as running, yelling, grabbing, and hitting, which may

threaten a dog. ... Elderly people are also considered at a higher risk of complications from dog-related injuries due to their increased susceptibility to bruising, lacerations, or broken/dislocated bones. On p. 1228, the SEIS adds to this expanded description of dog injuries that: In general, children are the most common victims of serious dog bites in the United States, with 70 percent of fatal dog attacks and more than half of serious bite wounds involving children... This is followed by an anecdotal quote from a DEIS comment from a parent whose small children were frightened by off-leash dogs.

The perception created by these statistics, and in particular the way they are presented, is that dogs in the GGNRA present a significant health risk for people, especially children and seniors. Children are likely to be seriously bitten and even killed by off-leash dogs in the GGNRA. The problem is that the SETS presents only part of the story.

The reality is that few dog bites happen in park settings like the GGNRA. In one of the most comprehensive analyses of injuries due to dog bites, Canadian researchers searched a national database of all reports of injuries throughout Canada in 1996. Dog bites represented 1% of all injuries in the CHTRPP database.

In other words, the chance of being bitten in a park like the GGNRA by a strange dog that you have not interacted with is pretty slim. Yet, that information is not included in the SEIS. Instead, the reports about dog bites are presented in a fairly alarming manner that gives the impression that dog bites are a significant safety issue in the GGNRA, when the reality is they are not.

Corr. ID: 6588 **Organization:** San Francisco Dog Owners Group **Comment ID:** 369656 **Organization Type:** Unaffiliated Individual

Representative Quote: THE SEIS DOES NOT ADEQUATELY ANALYZE HUMAN HEALTH AND SAFETY ISSUES

The SEIS, like the DEIS, does not provide an honest evaluation of impacts of dogs on human health and safety. This is particularly true in the SEIS discussion of dog bites. On p. 35, the SEIS says: Data collected by the Centers for Disease Control and Prevention show that approximately 4.5 million Americans are bitten by dogs each year, and one in five dog bites results in injuries that require medical attention. This statement is repeated on p. 336, followed by additional information that: Small children are typically the most common victims of dog-related injuries because of their natural behaviors, such as running, yelling, grabbing, and hitting, which may threaten a dog. ... Elderly people are also considered at a higher risk of complications from dog-related injuries due to their increased susceptibility to bruising, lacerations, or broken/dislocated bones. On p. 1228, the SEIS adds to this expanded description of dog injuries that: In general, children are the most common victims of serious dog bites in the United States, with 70 percent of fatal dog attacks and more than half of serious bite wounds involving children... This is followed by an anecdotal quote from a DEIS comment from a parent whose small children were frightened by off-leash dogs.

The perception created by these statistics, and in particular the way they are presented, is that dogs in the GGNRA present a significant health risk for people, especially children and seniors. Children are likely to be seriously bitten and even killed by off-leash dogs in the GGNRA. The problem is that the SETS presents only part of the story.

The reality is that few dog bites happen in park settings like the GGNRA. In one of the most comprehensive analyses of injuries due to dog bites, Canadian researchers searched a national database of all reports of injuries throughout Canada in 1996 (Canadian Hospitals Injury Reporting and Prevention Program, or CHIRPP; the study can be found at: <http://www.phac-aspc.gc.ca/injury-bles/chirpp/injrep-rapables/dogbit-eng.php>). Dog bites represented 1% of all injuries in the CHTRPP database.

Corr. ID: 6588 **Organization:** San Francisco Dog Owners Group **Comment ID:** 369660 **Organization Type:** Unaffiliated Individual

Representative Quote: So what about the second claim that conflicts between users have begun to rise? The SEIS offers no specific evidence to support this claim. However, it does discuss the total number of dog-related incidents, which is all we have available to consider. Table 5: Number and Types of Incident Reports Within GGNRA, 2001 -2011, on p. 253 of the SETS shows a total of 4,932 dog-related incidents, out of total number of incidents reported of 45,700; that is, dog-related incidents make up 11 of the total number of incidents. The non-dog-related incidents range from Drug Offences, to Trespassing, with nearly one-third listed as Other. Other clearly includes most violent crime in the GGNRA, from murder, to rape, to robbery, but the SEIS does not provide any information on how common such violent crime - the true safety risk for park visitors - is in the GGNRA. The first thing to notice is that the percentage of total incidents that are dog related hovers around 11% throughout the ten year period (ranging from a low of 6% to a high of 14% in 2004). This table does not show any significant increase in incidents, and by extension, in conflicts over the last ten years. There's no indication in this data that there have been increasing problems with dogs over at least the last ten years. This contradicts the SETS stated reason on p. 6 for a new Dog Management Plan.

A closer look at the data presented in Tables 11 through 28 (pp. 313 - 328) listing the

number and type of dog-related incidents at various GGNRA sites shows that the vast majority of incidents at each site were for leash violations or merely being in an closed area, without any wildlife disturbance or resource degradation. Clearly, there is no safety crisis or wildlife disturbance crisis or resource degradation crisis caused by dogs in the GGNRA.

Corr. ID: 6631 Organization: Not Specified Comment ID: 368404 Organization Type: Unaffiliated Individual Representative Quote: The SEIS seems to have completely avoided explicit discussion of risk assessment of off-leash dog activity that other entities have performed in relation to their determinations about how to manage the risk of off-leash dog activity. The EIS should explicitly provide a risk assessment of off-leash dog activities in GGNRA and use such an assessment to determine how the risks can be eliminated. Where those risks cannot be eliminated, such as many parks have concluded cannot be done, then GGNRA should be explicit about which visitors and/or user groups cannot safety interact with off leash dogs without risk to their visitor experience or safety.

Response: Additional law enforcement data, which includes dog incidents, has been analyzed and incorporated into the draft plan/SEIS. Please see chapter 3 Human Health and Safety for more details.

HS4015 - Health and Safety: Impacts of Dog Related Incidents

CONCERN STATEMENT: (Concern ID: 53359) Commenters presented detailed accounts of off-leash dog incidents, including knocking people over, biting, growling, barking, intimidating and harassing people, and attacking other dogs and horses.

Representative Quote(s):

Corr. ID: 26 Organization: Not Specified Comment ID: 337985 Organization Type: Unaffiliated Individual Representative Quote: In referenced to unleashed areas in federal parks- Any area that allows dogs to be unleashed should not be patrolled by mounted park police officers. It is an accident waiting to happen to allow horses in parks designated for unleashed dogs AND dogs to be under voice control. For everyones safety,including dogs,people,mounted officers & horses,KEEP horses OUT of the parks where you allow off leashed dogs.

Corr. ID: 112 Organization: Not Specified Comment ID: 345830 Organization Type: Unaffiliated Individual Representative Quote: At Ocean Beach, I have been bitten by a dog running off leash. It approached me aggressively while I was jogging. I asked the owner, who was nearby, to get it under control, at which point it leapt at me and bit my arm. I still have a scar. The owner expressed zero regret and took zero responsibility.

At Muir Beach, when I go there seeking peace and quiet, on a blanket off to one side, a steady parade of off-leash dogs bounds up, with no respect for the boundary of a blanket, sticking its snout in my face and/or food. Owners sometimes say "no" and the dogs sometimes respond, but there's another dog behaving like this every 5-10 minutes on weekends, making peaceful enjoyment of the beach impossible.

Corr. ID: 707 Organization: Not Specified Comment ID: 352992 Organization Type: Unaffiliated Individual Representative Quote: I am greatly concerned about the environmental impacts of off-leash dogs roaming our natural parkland. I have witnessed off-leash dogs chasing birds and other wild animals along our beaches and trails. I have also seen off-leash dogs chase runners, jump up on children and attack other dogs.

Corr. ID: 4694 Organization: Not Specified Comment ID: 361346 Organization Type: Unaffiliated Individual Representative Quote: I am a dog owner but am made to feel unsafe by other dogs that are off leash. My dog was attacked by three off leash Great Danes. The financial cost of seven surgeries required for her survival was \$10,000. My anxiety remains. Off leash dogs are unsafe. They should all be leashed except for fenced dog run areas.

Corr. ID: 5403 Organization: Not Specified Comment ID: 363175 Organization Type: Unaffiliated Individual Representative Quote: Off-leash dogs at the GGNRA have harmed park visitors. Off-leash dogs have been involved in many dog fights and dog bites at the GGNRA. Off-leash dogs have been injured at the GGNRA falling off steep cliffs. Charging and growling off-leash dogs frighten visitors and hamper their ability to enjoy the GGNRA. Running dogs off-leash at the GGNRA puts the welfare of wildlife at great risk. Off-leash dogs are more likely to leave behind dog feces in the park, reducing the recreational value of the GGNRA

Corr. ID: 6548 Organization: Not Specified Comment ID: 368850 Organization Type: Unaffiliated Individual

Representative Quote: I've written to you in the past detailing 2 injuries I sustained due to off leash dogs. One injury left me w / a labral tear of my hip, fractured hand and torn abdominal muscles and I was unable to work for 5 months. The second injury happened when a "friendly" high spirited dog lunged at me and it's claw drew blood all the way down my leg. Over the past several years, I've watched as dog owners took over Crissy Field with little intervention by the Park Police to enforce existing leash laws because they are scared of confrontation w / dog owners. Active people like myself fear being hit by a pack of dogs running off leash at high rates of speed; I can't imagine what would happen to the elderly or the very young should they be caught in the path of such unrestrained force. The worst are the dog walkers who bring down 8-10 dogs at a time to run and somehow believe they are in control.

Corr. ID: 6678 **Organization:** Wild Equity Institute **Comment ID:** 369611 **Organization Type:** Non-Governmental
Representative Quote: Over the last few yeai-s there have been numerous accounts of dogs negatively impacting visitor experiences. A woman visiting Crissy Field reported that her five year old son was attacked by a dog, which also gouged the leg of another child, and complained that other dogs were harassing small children in the area(2); a park visitor at Ocean Beach reported a dog being attacked by three off leash dogs(3); a hang glider at Fort Funston was bitten by an off-leash dog (4); and an offleash dog harassed a guard on horse patrol to the point of having to be pepper sprayed(5). These are just a few examples of the conflicts that can occur with off-leash dogs.

Response: Additional law enforcement data, which includes dog incidents, has been analyzed and incorporated into the draft plan/SEIS. Please see chapter 4 Human Health and Safety for more details. Dog management has been one of the top problems identified in park areas in visitor surveys. This plan and final plan/EIS seeks to address these issues.

CONCERN STATEMENT: (Concern ID: 53360) Many commenters described dog owners and commercial dog walkers as dismissive and argumentative. Commenters are concerned about the sense of entitlement that the dog walkers and owners show when their dogs are harassing other visitors.

Representative Quote(s):

Corr. ID: 368 **Organization:** *Not Specified* **Comment ID:** 351270 **Organization Type:** Unaffiliated Individual
Representative Quote: . Now I go to the beach at Fort Funston (of Pacifica Park, take your life at risk) to enjoy the sun, sand water I've some intense experiences where I feared my bare legs would be ripped apart. Most dog owners are responsible but there are enough that are surley, inattentive on their cell phones consider my fears cries for help an inconvenience at best. When a dog is aggressively coming forward, barking incessantly, showing his teeth nipping at my clothes - I have good reason to be afraid. Packs of dogs are the worst. But one horrible time a woman was there with her boyfriends dog for fifteen minutes the dog was running rapid circles around me with her between me the dog as he fiercely growled showed his teeth. Panicked I yelled he wants to bite she said No he just wants to harm me, I'm not sure what the difference is. Finally I took refuge in a tall hefty guy walking down the beach. Suddenly the dog calmed down. The woman told me this was a rescue dog with fierce instincts to protect her.

Corr. ID: 795 **Organization:** *Not Specified* **Comment ID:** 353302 **Organization Type:** Unaffiliated Individual
Representative Quote: To someone who has been attacked, being approached by a group of unleashed dogs and a single human (often off in the distance somewhere) can be a terrifying experience. Having been in this situation I can assure you that compassionate reactions from dog walkers are rare. Mocking amusement, scoffing at the person's fear, or outright anger and aggression are far more common. Add to this those who are not steady on their feet, such as the elderly, and others who are vulnerable, such as children, and we have a situation where dog owners demanding that all areas be off leash are being extremely selfish.

Corr. ID: 4279 **Organization:** *Not Specified* **Comment ID:** 362354 **Organization Type:** Unaffiliated Individual
Representative Quote: Secondly, I have had large off leash dogs jump up on me and nearly knock me over while their owner laughs heartily in the distance. I have had dog walkers with 5 dogs, 4 off leash, watch as their growling dog cornered me near the stream on a hillside. When the dog walker called for the dog, he did not come, and I had to scream and pick up a stick, and the dog walker had to physically remove the dog. The trails are becoming dangerous to walk on

when owners do not keep their dogs on leash.

Response: GGNRA wants to ensure that it is welcoming to all, and that no one feels harassed by another visitor in the park. Similar to trail etiquette now being encouraged and reinforced in the Bay Area, we want to reinforce civility and cooperation amongst different user groups. However, verbal or physical harassment is unacceptable in the park experience and a citable offense; any such incidents should be reported immediately. NPS regulations prohibiting harassment will be enforced.

CONCERN STATEMENT: (Concern ID: 53361) Many commenters are concerned about the impact that unruly dogs will have on small children. Being jumped on or knocked over has instilled fear of dogs in the children of several commenters. Other commenters expressed concern over the amount of damage dogs can inflict if they were to bite a young child.

Representative Quote(s):

Corr. ID: 54 Organization: Not Specified Comment ID: 338926 Organization Type: Unaffiliated Individual

Representative Quote: I was a former dog owner - and though I love dogs; it just is not safe for young children. A large dog can run 15-40 mph chasing after a ball launcher. That's a large impact on a child, scratching them, running over them and hurting them. My children are now afraid of dogs; and they shouldn't be. The sanitation is also a large issue. When you have many dogs, how in the world will you be able to keep track of all the dog feces if your 6-8 dogs are running in every direction.

Corr. ID: 957 Organization: Not Specified Comment ID: 353828 Organization Type: Unaffiliated Individual

Representative Quote: I have a 2-year-old who loves hiking on his own. We go to GGNRA areas frequently, but lately there have been several incidents where we were walking and without warning an off-leash dog has come bounding up to my son, jumping on him or stomping on him or just surprising him before I could make an appropriate doggy introduction or pick him up out of reach- -while the dog's owner has ineffectually shouted "he's very friendly!" from far away. I have tried to downplay the incidents in my son's mind, but the result is that now he is scared of all dogs and runs screaming from them. (I hate to think if any of these dogs had actually been unfriendly or aggressive toward him!)

If there is an area where off-leash dogs and children are both present, the dogs always win, and the children always lose (from incidents where dogs scare/injure children to dog poop that hasn't been picked up). There needs to be a balance of uses.

Response: The dog management plan offers opportunities for a range of visitor uses and experiences throughout the park while protecting park resources. There are many areas designated for no dogs or on-leash dog walking for visitors who do not enjoy recreating around off-leash dogs. Most VSCAs will have established demarcated landforms and/or fencing separations that will reduce the number of off-leash dogs from entering into non-VSCAs. Dog walkers will also have the responsibility to ensure that their dog does not have contact with a visitor if uninvited by that visitor. Such behavior will be monitored and is a citable violation.

CONCERN STATEMENT: (Concern ID: 53362) Some commenters believe that the visitors of Golden Gate National Recreation Area have learned to coexist, stating that incidents are very rare.

Representative Quote(s):

Corr. ID: 5312 Organization: Not Specified Comment ID: 362950 Organization Type: Unaffiliated Individual

Representative Quote: In all that time and on all those occasions there have been very few encounters (I can count them on the fingers of one hand) with other park users who have problems with off leash dogs. Instead all the different types of folks I've encountered on the trail seem to have learned to get along with one another, especially after it became evident that, due to funding cuts everywhere, there's no authority figure they can run to with their problems

Response: Incidents reported are likely a small percentage of overall incidents given that park law enforcement staff are currently unable to focus exclusively on dog management. However, the park has received many public comments noting incidents, and we cannot ignore that dog incidents can be a problem. One objective of the dog management plan is to reduce user conflict and provide a clear, enforceable dog policy. We believe this will enhance various user groups' ability to use the park responsibly.

CONCERN STATEMENT: (Concern ID: 53363) Commenters feel that dogs can be the cause of introducing disease to wildlife.

Representative Quote(s):

Corr. ID: 663 Organization: Not Specified Comment ID: 403959 Organization Type: Unaffiliated Individual

Representative Quote: Lastly, health is a concern (Foster 2006). Fecal and urine waste can carry pathogens (bacterial, viral, parasitic) that may affect visitors and other animals.

Response: Chapter 4 provides an updated summary of the literature review that was conducted to document associations between dogs and wildlife. No studies have proven that dogs are the cause for introducing disease to wildlife.

HV1400 - Homestead Valley: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53248) Commenters suggest keeping the area to the east of Four Corners including Homestead Hill available to off-leash dog walkers.

Representative Quote(s):

Corr. ID: 545 **Organization:** *Not Specified* **Comment ID:** 351900 **Organization Type:** Unaffiliated Individual

Representative Quote: The area to the east of Four Corners including Homestead Hill is used extensively by local citizens to walk their dogs off leash. Please keep this open and available.

Response: Off-leash dog walking would not be permitted on trails at Homestead Valley due to the need for protection of native plant communities, wildlife and wildlife habitat. Off-leash trails would also attract more traffic onto very narrow community roadways with limited parking on the shoulders while increasing uses from outside the community onto adjoining Homestead Valley Trust lands, a concern expressed locally by members. Please see chapter 2, Preferred Alternative for Homestead Valley for additional rationale.

CONCERN STATEMENT: (Concern ID: 53249) Commenters suggest that the trails of Homestead Valley should be altered to include trails that loop into off-leash trails offered by the Homestead Valley Land Trust trails. These trails would begin at Amaranth at the west end and the fork before Waterview Drive in the East.

Representative Quote(s):

Corr. ID: 3556 **Organization:** *Not Specified* **Comment ID:** 359197 **Organization Type:** Unaffiliated Individual

Representative Quote: If you must require leashed dogs on Homestead Ridge, adjust the trails to include trails completing the loop into the off-leash-allowed Homestead Valley Land Trust trails that begin at Amaranth at the West end and the fork before Waterview Drive in the East.

Response: The network of social trails within NPS lands are not authorized NPS trails and therefore not addressed by the dog management plan. The authorized trails in GGNRA in Homestead Valley are for on-leash dog walking only (please see the dog management final plan/EIS chapter 4, Alternatives Eliminated from Further Consideration). The maps in the final plan/EIS appendix disclose where connections may be made to trails outside of GGNRA's jurisdiction.

LE1400 - Lands End: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53250) Commenters stated that a ROLA should be established within Lands End.

Representative Quote(s):

Corr. ID: 318 **Organization:** *Not Specified* **Comment ID:** 350574 **Organization Type:** Unaffiliated Individual

Representative Quote: . I can see an effort at that at Ocean beach for instance, but Lands End needs a ROLA area, as does the East end of Ocean Beach. The middle beach section is too small, and not very accessible.

Response: No VSCAs would be established at the site due to visitor safety. Lands End is a cliff side walk where both visitors and dogs have had to be rescued in the past; and, it is inappropriate for dogs off-leash both for safety of dog and walker as well as those visitors passing by on the trail. Please see chapter 2, Preferred Alternative for Lands End for additional rationale.

CONCERN STATEMENT: (Concern ID: 53251) Commenters stated that dogs should not be allowed on the trails within Lands End.

Representative Quote(s):

Corr. ID: 2000 **Organization:** *Not Specified* **Comment ID:** 354669 **Organization Type:** Unaffiliated Individual

Representative Quote: Additionally, dogs should not be allowed in the nearby Lands End trails if they already invaded the Ocean Beach.

Response: The preferred alternative would allow a no-dog experience in the area of Lands End on the Mile Rock Beach trail, the old roadway up to the octagon house, and below Lands End visitor center to the Sutro Baths. Otherwise, the main trail and access trails to it are for managed dog walking on-leash. Please see chapter 2, Preferred Alternative for Lands End for additional rationale.

LP1000 - Laws and Policies: Impact of GGNRA actions on other NPS units' enforcement of servicewide policies and regulations

CONCERN STATEMENT: (Concern ID: 53364) Commenters expressed concern that allowing the GGNRA to be open for off-leash dog use and commercial dog walking would encourage or justify having dogs in other NPS units. This could result

in adverse impacts in other sensitive areas of the national park system and set a bad precedent.

Representative Quote(s):

Corr. ID: 1555 Organization: Not Specified Comment ID: 353097 Organization Type: Unaffiliated Individual

Representative Quote: Above all, if you permit rampant dog off leash areas in GGNRA, the dog owners will then ask that even more sensitive areas such as Yellowstone, Yosemite and other great national parks to be opened up, to the detriment of wildlife. Please maintain on leash rules for all national parks and recreation areas.

Corr. ID: 5200 Organization: Not Specified Comment ID: 362590 Organization Type: Unaffiliated Individual

Representative Quote: Nearly all national parks strictly control the presence of dogs; it would be an extraordinarily bad precedent for the Park Service to sanction commercial dog walking in GGNRA, essentially turning a resource that belongs to all Americans over to a commercial enterprise that would damage park resources and make GGNRA a less desirable (and, for some, frightening) place to visit.

Corr. ID: 5792 Organization: Napa-Solano Audubon Society Comment ID: 403960 Organization Type: Unaffiliated Individual

Representative Quote: So NSAS feels there should be NO area in the National Park that dogs should be allowed to go off leash to protect them, people, and some other dogs themselves. We are sorry to take such a tough stance on this, but wildlife, especially those rare and endangered species as stated above are in your charter to protect. Dogs and cats have an excellent sense of smell and can find and disturb nesting birds and loafing animals. So do those animals. If they get a whiff that there are predators, they will not use that habitat. It is very unfortunate that these pets have been surrogate children for some of adults that use GGNRA. And it is also irresponsible for those that unleash their dogs in a LEASHED zone. In our opinion they care more about themselves than anyone (wildlife, other people and other dogs). It is very understandable why they want their dog (who of course can do no harm) to go unleashed. However we think they truly do not understand the issue here. Responsible dog owner have alternatives to take their dogs to a place where they are allowed to roam unleashed, not a National Park where they are not allowed. If they want to enjoy this National Park, do it without your dog. It is disturbing to NSAS that the policy on dogs off leash can be made by your administration which would set a precedent to other parks, monuments, etal under the National Park Service jurisdiction.

Corr. ID: 6323 Organization: Marin Audubon Society Comment ID: 365536 Organization Type: Unaffiliated Individual

Representative Quote: Precedent Setting Nature Not Addressed

The DSEIS reports that GGNRA is the only facility in the entire national park system that allows off leash dogs. "Dogs that are not controlled by caging or a leash no longer than six feet are currently prohibited across the entire national park system (36 CFR 2.(a)(2))...." The DSEIS should address the nationwide implications of opening areas to off-leash dogs at GGNRA. It is a significant concern that allowing off-leashed dogs at GGNRA could be used to justify and encourage opening other parks to off-leash dogs. This would significantly broaden the adverse impacts of off-leash dogs on wildlife and natural habitats. This is a major potential impact that should be addressed.

Corr. ID: 6408 Organization: Not Specified Comment ID: 366918 Organization Type: Unaffiliated Individual

Representative Quote: GGNRA is also perpetuating a horrific precedent that will reverberate throughout the National Park system by having regulations pertaining to pets at odds with those at nearly every other NPS site. I already encounter many pet owners walking their dogs on the trails of PRNS who express surprise that pets aren't permitted on these trails given that they frequently walk their dogs in GGNRA...and aren't both PRNS and GGNRA NPS sites...and if they can walk their dogs on GGNRA trails, why not within PRNS?

Response: This issue is identified and discussed in the draft plan/SEIS in chapter 1, under the "Impacts of Dogs on Natural and Cultural Resources in the Park". The current regulations and management of other park units and the GGNRA are covered in the "National Park Service Organic Act and Management Policies" section of chapter 1, and the "Background of Dog Management at Golden Gate National Recreation Area" section of chapter 1. All other national park system units are governed by 36 CFR 2.15, which requires pets be on leash in all areas not otherwise closed to pets by the superintendent.

LU1000 - Land Use: Policies and Historical Use

CONCERN STATEMENT: (Concern ID: 53365) Commenters stated that people and dogs have been using the GGNRA lands responsibly for decades. Dog walking occurred in these areas long before the GGNRA was created. Many of these areas are former military lands, and dog walking is consistent with this history. Because GGNRA was created with off-leash

dog use as one of the original uses of the land; dog walking should continue. The new dog plan does not align with the historical use of the land or the recreational intent of why these areas were created.

Representative Quote(s):

Corr. ID: 4996 **Organization:** *Not Specified* **Comment ID:** 361902 **Organization Type:** Unaffiliated Individual

Representative Quote: But to restrict off-leash dog use in a recreational area that is part of a city like San Francisco, which has a long tradition of its people recreating with its dogs in many forms, goes completely against the grain of the use of these lands and is not what the City of San Francisco intended when they deeded you these lands.

Corr. ID: 5235 **Organization:** *Not Specified* **Comment ID:** 362744 **Organization Type:** Unaffiliated Individual

Representative Quote: National Park rules such as dogs in parking lots do not apply. Furthermore there is legal precedent for off-leash recreation, especially up to the high-tide line on beaches where the land belong to all Californians. The historical use of these lands has been for military purposes for several centuries, so continued human and pet use is consistent with historical use.

Corr. ID: 5280 **Organization:** *Not Specified* **Comment ID:** 362869 **Organization Type:** Unaffiliated Individual

Representative Quote: Dogs need off leash time to get adequate exercise. People and dogs have been enjoying the GGNRA for this purpose for decades, and off leash areas should be protected in the GGNRA.

Corr. ID: 5289 **Organization:** *Not Specified* **Comment ID:** 362887 **Organization Type:** Unaffiliated Individual

Representative Quote: When the GGNRA was created in 1972, dog walking was already a long-standing use of the lands that were turned over to the park. Dog walking was specifically referred to as a long-standing use for the newly created GGNRA in 1972, and as such this specific recreational use and part of the San Francisco Bay culture - and this use must continue indefinitely.

Corr. ID: 5349 **Organization:** *Not Specified* **Comment ID:** 362999 **Organization Type:** Unaffiliated Individual

Representative Quote: Dogs and dog-walking, both on and off leash, existed in the lands now controlled by the GGNRA before the GGNRA was created.

Corr. ID: 5530 **Organization:** *Not Specified* **Comment ID:** 363905 **Organization Type:** Unaffiliated Individual

Representative Quote: I am against this plan because it takes away the traditional uses that come with the land when it was transferred from the City of San Francisco to the GGNRA. The 1979 recreational uses included allowing people to throw a ball or a frisbee to their dogs on the beach or to go running with their dogs off leash or to simply allow their dog to play with another dog on the beach - one of the loveliest sights ever.

Response: Dog walking that occurred on GGNRA lands prior to their acquisition by NPS is discussed in the "Land Use Prior to Park Acquisition" section of chapter 1. Once acquired by NPS, lands within the GGNRA are managed in accordance with NPS laws and policies. Both the NPS Organic Act and the park's enabling legislation allow for appropriate recreational uses. These laws do not require NPS to prioritize recreational use over resource protection, to favor one type of recreation over another, or to allow all uses that pre-dated NPS ownership to continue. The dog management plan/EIS has several objectives, including to "provide a variety of visitor experiences", "improve visitor and employee safety", "reduce user conflicts", and "preserve and protect natural and cultural resources and natural processes". These objectives are based in part on the Negotiated Rulemaking Committee's consensus agreement of what the dog management plan's "Guiding Principles" should be. While the GGNRA received many comments seeking expanded dog access, the GGNRA also received many comments from other recreational users requesting that dog walking be better managed and that the use be limited to specific areas of the park, in part because these recreational users feel they can no longer recreate in areas where dogs are present due to conflicts with dogs and dog walkers. The dog management plan continues to recognize dog walking as an appropriate recreational activity in the park and presents a range of alternatives that considers options for dog walking within the context of other recreational activities and resource management objectives. Under the preferred alternative, off-leash dog walking would continue, but in fewer areas. The NPS believes that the preferred alternative best accomplishes the plan's overall objectives.

CONCERN STATEMENT: (Concern ID: 53366) Commenters are troubled by the lack of recognition of Golden Gate National Recreation Area as an urban environment. The commenters believe that the national recreation area should be treated as such, not on the same level as national parks. GGNRA provides open space between urban neighborhoods, not a wilderness experience.

Representative Quote(s):

Corr. ID: 4005 Organization: Not Specified Comment ID: 368798 Organization Type: Unaffiliated Individual
Representative Quote: GGNRA has numerous features that have been designed and built by humans, from trails, to signage, to parking lots and buildings and other facilities, to habitat restoration projects. It includes many constructed environments, including former military installations and city parks. GGNRA is not a wilderness. GGNRA is in many respects a designed landscape. Even efforts to restore its natural values involve urban design components, such as vegetated berm separation and other design features to preserve its resources and values.

It is hard to imagine how the SDEIS could dismiss "urban quality" as not relevant (page 24):

"Consideration of this topic is required by 40 CFR 1502.16. The quality of urban areas is not a significant factor in determining a dog management policy for GGNRA. No new building construction or rehabilitation of existing structures is proposed under the alternatives presented in this draft plan/SEIS; therefore, this topic has been dismissed from further analysis. " (emp. added)

This statement in the SDEIS misinterprets CEQ rules and results in basic noncompliance with NEPA. GGNRA is in an urban area; it was established to improve urban quality of life; the design of this urban parkland could not be more relevant. The design of urban parks is a recognized discipline. Good design is central to the ability to preserve park resources and values, including recreation, ecology, and cultural values.

This one paragraph from the SDEIS, quoted above, dismissing urban quality and design of the urban environment, highlights the absence of rigorous expiration of alternatives, as required by NEPA, CEQ, DOI and NPA NEPA rules, procedures and guidance. It also demonstrates the document's bias in treating GGNRA like a traditional national park and not as an urban unit of the national park system. NPS/GGNRA seems out of its comfort zone here, but this doesn't excuse the omission.

Corr. ID: 6430 Organization: Not Specified Comment ID: 367014 Organization Type: Unaffiliated Individual
Representative Quote: GGNRA should be a partner with the City of San Francisco and other communities, not act as an adversary. The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

Response: The enabling legislation for GGNRA recognizes that GGNRA is located in an urban environment. The enabling legislation further states that the recreation area is to be preserved as far as possible in its natural setting and protected from uses that would destroy the scenic beauty and natural character of the area. Since the late 1970s and in response to Congressional amendments to the National Park Service Organic Act, all units of the national park system have been managed to the same high standard. The fact that GGNRA is designated as "recreation area" and not a "national park" does not change how the park is managed. The preferred alternative allows for more dog walking opportunities than any other national park unit in the United States. The restrictions on dog walking in the preferred alternative are reasonably designed to reduce conflicts with other types of recreational activities and to further natural and cultural resource management objectives.

CONCERN STATEMENT: (Concern ID: 53367) One commenter noted that the description of historical dog use at Rancho Corral de Tierra in the draft plan/SEIS was inaccurate, as it did not take into account the longer history of landowners allowing off-leash dogs on the property.

Representative Quote(s):

Corr. ID: 6547 Organization: Not Specified Comment ID: 368661 Organization Type: Unaffiliated Individual
Representative Quote: I bring to your attention this phrase regarding Rancho: "Historically, although off-leash dog walking was not officially sanctioned by the previous private owner, off-leash use occurred frequently." This statement is weak in its portrayal of historic use because 1) POST (Peninsula Open Space Trust) was the landowner for only about 13 of the past 32 years; their policies of dog walking were not clearly posted throughout that period. For the preceding 20 years, there have been NO OBJECTIONS posted or otherwise by landowners to dog walking by voice control. This was not just negligence on the part of the previous landowners - I was in touch with each of them because of my sustained lease of pasture for horses.

My point: your premise of "Historically" is biased to a minor portion of our history, rather the majority of time supported voice-control dog walking. A more accurate portrayal our historic use would be "Historically, off leash dog walking was highly used and valued in two concentrated areas"

Response: Rancho Corral de Tierra was managed by the Peninsula Open Space Trust (POST) prior to transfer to GGNRA in 2011. Off-leash dog walking was not authorized by POST during its management of the property. The final plan/EIS recognizes that off-leash dog walking occurred at the Rancho property prior to its acquisition by NPS. This past use is also discussed in the cumulative impacts section for Rancho Corral de Tierra. Upon transfer of the property to NPS in 2011, NPS regulations automatically went into effect, including the NPS servicewide pet regulation at 36 CFR 2.15, which requires all pets to be on leash.

LU2000 - Other Agencies Policies and mandates Regarding Dog Management

CONCERN STATEMENT: (Concern ID: 53368) Because of the restrictive dog policies systemwide in NPS, commenters spent more time in BLM lands, where regulations are less stringent.

Representative Quote(s):

Corr. ID: 142 **Organization:** Not Specified **Comment ID:** 346307 **Organization Type:** Unaffiliated Individual

Representative Quote: Additionally, I think it is sad that such strong limits are placed on dogs across the national park system. I am a strong advocate for the National Park System and a supporter of Wilderness areas as well as other natural resource designations. But sadly because of the strong restrictions on dogs I am unable to consider them as vacation options. We end up spending more time in national forest land or BLM lands where the restrictions are less stringent.

Response: NPS's primary mandate is the preservation and protection of park resources and values, stricter than the BLM's multiple use mandate. So, uses can often be more accommodating within BLM lands.

CONCERN STATEMENT: (Concern ID: 53369) Commenters stated that GGNRA should be managed in a way similar to East Bay Regional Park District due to their success in managing dog walkers.

Representative Quote(s):

Corr. ID: 317 **Organization:** Not Specified **Comment ID:** 350571 **Organization Type:** Unaffiliated Individual

Representative Quote: In April of 2013 the perennially dog friendly East Bay Regional Park District's Board voted unanimously to amend Ordinance 38 adding significant controls and limitations for dogs and their owners accessing the EBRPD's system. The basis for this ruling was public safety and environmental preservation. I ask that the National Park Service at least rise to the level of EBRPD's action.

Corr. ID: 2595 **Organization:** Not Specified **Comment ID:** 359134 **Organization Type:** Unaffiliated Individual

Representative Quote: Redwood Park in the East Bay Regional Park System and Carmel Beach (Carmel, CA) are very good examples that off-leash can work. It is important for dogs to have the freedom to run, play, and socialize. I understand that there are sensitive areas that need to be protected, but there also needs to be areas where the millions of dog owners, who are responsible, can enjoy the outdoors with their loved ones (dogs!).

Corr. ID: 4224 **Organization:** Not Specified **Comment ID:** 362234 **Organization Type:** Unaffiliated Individual

Representative Quote: On page 31 the SEIS cites the use of "Point Isabel Regional Shoreline, which is a state park area managed by East Bay Regional Park District and one of the most heavily used dog parks in the country." but fails to examine any of the successes that are so characteristic of this park, a potential framework for GGNRA dog management.

Response: NPS consulted with both Boulder County Open Space and Mountain Parks as well as other public land agencies who manage dog walking such as Marin County Open Space District and East Bay Regional Parks. While these agencies do not share the same national park mandate to preserve and to protect park resources to the same degree as a primary mission, they understood NPS's proposal to better differentiate such behaviors, recognizing that our standards as such need to be higher in regard to resources

CONCERN STATEMENT: (Concern ID: 53370) Commenters made suggestions on the analysis of adjacent areas addressed in the draft plan/SEIS. These included adding a better discussion of the areas and how these areas determined policies and warned visitors, a re-analysis of the alternatives given the problems of off-leash dogs in adjacent areas, and a correction of the language about policies in other areas.

Representative Quote(s):

Corr. ID: 4005 **Organization:** Not Specified **Comment ID:** 368801 **Organization Type:** Unaffiliated Individual

Representative Quote: The survey of other areas ranges from sloppy to inaccurate. For example, on page 32, the

SDEIS states:

"Seattle, Washington. Dogs are allowed to roam off leash at 11 of the 400 parks and recreation areas in the Seattle metro area. Although dogs are allowed on leash in most other park areas, they are not allowed on beaches, play areas, or organized athletic fields. Owners are responsible for waste removal. Fines are implemented for leash and waste-removal violations (Seattle Parks and Recreation 2009, 1, 3)."

This statement is incorrect. In fact, Seattle does allow dogs on beaches (Magnuson Park), as does the City of Vancouver (there is a dog beach on False Creek/English Bay next to the Burrard Bridge). In fact, this information is readily available on both the City of Seattle's and City of Vancouver's websites. Vancouver parks' website starts with the statement: "Dogs are welcome in all of Vancouver's parks and must be on leash unless they are in a designated dog off-leash area" and shows photos where dogs can be off-leash at various beaches and waterbodies.

Although these areas are smaller than San Francisco's extensive saltwater beaches, if such easily obtained information is incorrect in the SDEIS, it raises serious questions of the accuracy - or more likely - bias and lack of objectivity in its preparation.

Corr. ID: 6631 Organization: Not Specified Comment ID: 368400 Organization Type: Unaffiliated Individual Representative Quote: The SEIS mentions the dog policies of National Parks, California State Parks, and other parks or open spaces of counties, municipalities, or other local entities. This section would be much more useful: 1) if there was some discussion about in what proportion of parks and other open space areas entities ban off-leash dog walking and what type of risk assessment led to those policies, and 2) if in those entities where off-leash activity is allowed, what warnings and rules for visitors entering off-leash areas are operative. Such a survey would provide a much better context to proposed dog management alternatives in relation to how the issue has been handled by other entities than by simply mentioning policies of those different entities.

Corr. ID: 6631 Organization: Not Specified Comment ID: 368401 Organization Type: Unaffiliated Individual Representative Quote: My initial survey suggested that most parks that allow off-leash dogs have enclosed "dog parks". Most parks that allow off-leash dog play activity provide specific warnings to visitors about the risks involved in entering an off-leash dog zone. There is frequently mention that the park or other entity cannot guarantee the safety of visitors. Since GGNRA is proposing to allow off-leash dogs on some GGNRA beaches and in mixed use areas, the EIS needs to explain how and why NPS thinks it can overcome the problems of off-leash dog activity cited by the other entities while attaining its stated goal of minimizing conflicts related to dog use by providing a variety of safe, high quality visitor use experiences.

Response: NPS conducted a survey in the summer of 2012 to measure customer satisfaction related to dog walking at GGNRA (NPS 2012b). The GGNRA Dog Walking Satisfaction Visitor Study (NPS 2012b) evaluated the perception of and satisfaction with the current dog walking policies, and the potential for redistribution of use based on access changes. Results of this survey were used to determine what other parks (referred to as nearby dog walking areas) the visitors would choose to visit if on-leash or off-leash dog walking was limited as a result of this plan/EIS. Using the results of this survey, a more detailed evaluation of the potential impacts to alternative sites identified in the survey was completed for the draft plan/SEIS. Detailed information regarding natural resources, acreage of off-leash play, parking availability, etc. were incorporated into this analysis, including cumulative impacts as a result of the Significant Natural Resource Areas Management Plan (SNRAMP), which proposes to close/reduce some of the existing dog play areas (DPAs), such as the Lake Merced site, in San Francisco. Additional details on redistributional effects have been added to chapter 4 of the final plan/EIS.

LU3000 - Land Use: Dog Parks Provided by San Francisco and Other Municipalities

CONCERN STATEMENT: (Concern ID: 53371) San Francisco and surrounding municipalities provide adequate areas for off-leash dog recreation. Some commenters noted that there are many options for dogs, but there are not many other options for wildlife.

Representative Quote(s):

Corr. ID: 68 Organization: Not Specified Comment ID: 338956 Organization Type: Unaffiliated Individual Representative Quote: There are more off leash dog parks in San Francisco than several other major cities combined. There are many options for people who want to have their dogs off leash, but there are not many options for the endangered species which we must protect and preserve for future generations.

Corr. ID: 2332 **Organization:** *Not Specified* **Comment ID:** 357807 **Organization Type:** Unaffiliated Individual
Representative Quote: There are two enormous dog parks that I know of in Southern Marin - - one in Mill Valley and another in Tiburon. People can throw balls for their dogs there. It's not like the GGNRA is the only place to recreate with a dog in this area-that argument is just nonsense.

Corr. ID: 4256 **Organization:** *Not Specified* **Comment ID:** 368472 **Organization Type:** Unaffiliated Individual
Representative Quote: Municipalities adjacent to GGNRA lands have ample resources to provide and maintain dedicated off-leash dog play areas, as these are among the wealthiest counties in the nation. It is not difficult to imagine that if presented with an elimination of off-leash privileges within the GGNRA, local municipalities will realize their own resourcefulness and capability to meet the demands of their citizenry.

Corr. ID: 5046 **Organization:** *Not Specified* **Comment ID:** 362111 **Organization Type:** Unaffiliated Individual
Representative Quote: There are already over 300 acres of off-leash dog parks in San Francisco. This is according to a website operated by dog lovers. Most of the ones listed below do not require leashes, and the rule is not observed in the two that do say "leash required."

Corr. ID: 5606 **Organization:** *Not Specified* **Comment ID:** 364005 **Organization Type:** Unaffiliated Individual
Representative Quote: There are plenty of City parks in San Francisco that allow off-leash dogs. There is no need to turn the GGNRA into another dog run.

Corr. ID: 5612 **Organization:** *Not Specified* **Comment ID:** 364009 **Organization Type:** Unaffiliated Individual
Representative Quote: There are PLENTY of places for dogs to be off-leash in SF. There are much fewer places for native plants and animals to exist in relative peace, so I'm all for less off-leash dog areas in the GGNRA. While not a dog owner, I love dogs, but let's remember they are dogs. Not kids. Not people. And there are a large number of irresponsible dog owners out there who can't be trusted to maintain control of their dogs

Response: One objective of the dog management plan/EIS is to "preserve and protect natural and cultural resources and natural processes." Areas identified as having sensitive resources do not allow on and/or off-leash dog walking, depending on the resource and site. Adjacent dog parks available for visitor use can be found within the discussion of impacts for resources in chapter 4.

CONCERN STATEMENT: (Concern ID: 53372) The dog management plan would cause adverse impacts on city dog parks and other parks used by dog walkers in the Bay Area, including the remaining ROLA and on-leash dog walking areas at GGNRA. Dog parks provided in San Francisco and other areas are not sufficient for the dog walking population. Commenters are specifically concerned about the impacts to areas such as Little Beach, Lake Merced, McLauren Park, Stern Grove, Alamo Square, DuBoce Park, Buena Vista Park, Pine Lake, Lafayette Park, Golden Gate Park, and Bernal Heights. Commenters felt that these dog parks are already overcrowded, worn down, and dangerous; fenced areas cause aggression and are not satisfying to dogs or dog walkers. Commenters believe that the draft plan/SEIS did not adequately address the impact of the influx of dogs in these areas.

Representative Quote(s):

Corr. ID: 154 **Organization:** Seth Green Canine Care **Comment ID:** 349881 **Organization Type:** Unaffiliated Individual

Representative Quote: As it is well known, there are many dogs in and near San Francisco. One estimate I have heard is ~175,000 dogs in SF County alone. Further restricting where dog owners and commercial dog walking operations can (legally) take their dogs will promote further conflict in the few remaining off leash areas (your plan calls them ROLAs).

Corr. ID: 322 **Organization:** *Not Specified* **Comment ID:** 350584 **Organization Type:** Unaffiliated Individual
Representative Quote: Do not direct public to the "Little Beach" adjacent Muir Beach. This beach cannot sustain the traffic, nor is access all year round as tides vary with the season. Coastal trail is currently open to dog walking. In preferred plan no dogs will be allowed. This will virtually cut the community of Muir Beach off from any dog walking other than on the busy Frank Valley Rd, Hwy 1 community roads.

Corr. ID: 501 **Organization:** *Not Specified* **Comment ID:** 351817 **Organization Type:** Unaffiliated Individual
Representative Quote: This new plan would essentially keep me restricted to dog parks such as Doboce, Dolores,

Alamo Square and Corona Heights. So what's the big deal right? Other than Corona, none of these are fenced in and are surrounded by traffic. Luckily our dog is old enough to understand the boundaries of these parks, however as a puppy we were reluctant to let her off leash and the times she did step out of bounds were terrifying. Also these parks tend to be over crowded with people other dogs and homeless encampments. They show the wear and tear of use which the parks of the GGNRA do not. We have to keep an eye out for our wondering pup making sure she doesn't get into the mud which is full of giardia, people's pick-nicks or mess with the homeless.

Corr. ID: 852 **Organization:** Save McLaren Park **Comment ID:** 353418 **Organization Type:** Unaffiliated Individual
Representative Quote: I'm writing to express my STRONG OPPOSITION to the proposed dog management plan for GGNRA. My concern stems from how this plan will negatively affect Bay Area parks that are not part of the GGNRA. By pushing most of the dogs out of the GGNRA, the most likely place for people to take their pets is regional and urban parks, such as McLaren Park in the south eastern portion of San Francisco.

McLaren is a dog-friendly place, and already there's concern that heavy dog use is affecting the flora and fauna of the park, especially with the volume of dog walkers with their client's pets. If GGNRA properties are deemed off limits to dogs, parks like McLaren will be overwhelmed and the natural environment of this park could be severely damaged.

By spreading dogs throughout all the open space in the bay area, including GGNRA properties, the damage to any one location will be minimized.

Corr. ID: 1007 **Organization:** *Not Specified* **Comment ID:** 351416 **Organization Type:** Unaffiliated Individual
Representative Quote: As further proof that the GGNRA did not consider impacts on city parks in San Francisco, the Preferred Alternative suggests the nearest legal off-leash area in San Francisco to Fort Funston is Lake Merced. That off-leash area has been closed to off-leash for years and has been turned into a native plant restoration area and habitat for the endangered red-legged frog among other animals. Yet this is where the SEIS suggests people with dogs go.

Corr. ID: 1037 **Organization:** *Not Specified* **Comment ID:** 351467 **Organization Type:** Recreational Groups
Representative Quote: I live in Bernal Heights just blocks away from one of the few off leash city parks in San Francisco. The park is already very well frequented, and I dare not imagine the devastating environmental impact your plan would have on our park. Simply put, if you restrict dog access the way you outline it in Alternative F, the dogs that frequent GGRA land are not going to magically disappear, they are going to have to be walked somewhere, and the city simply doesn't have the infrastructure to handle that influx of dogs in its city parks. The parks would be ruined, and recreation really would become inaccessible to non-dog owners who weren't frequenting GGRA sites anyways and are now unable to enjoy city parks. Not to mention the fuel emissions of those responsible dog owners who would decide to seek friendly trails in East Bay Regional Parks.

Corr. ID: 1374 **Organization:** *Not Specified* **Comment ID:** 352412 **Organization Type:** Unaffiliated Individual
Representative Quote: I hope you will consider the impact on San Francisco and Marin if off leash dog walking is banned in the GGNRA. Banning or further limiting off leash dogs will have a significant negative impact on San Francisco and Marin parks. And recreation areas At least 10,000 dogs visit the GGNRA every day. San Francisco city parks are much, much smaller than the GGNRA and will be unable to absorb the impact of all those dogs if they are forced out of the GGNRA. The negative impact on parks and other recreation areas in San Francisco and Marin far outweighs any potential negative impacts in the GGNRA.

Corr. ID: 1586 **Organization:** *Not Specified* **Comment ID:** 353155 **Organization Type:** Unaffiliated Individual
Representative Quote: By restricting the use of these lands, you are forcing dog owners to flock to smaller urban parks, which will cause overcrowding and congestion in the neighborhoods these parks are in. We live in the outer sunset and during the federal furlough when Fort Funston was closed, we saw Pine Lake Park inside Stern Grove get jam-packed with dogs & people - - just awful.

Corr. ID: 1893 **Organization:** *Not Specified* **Comment ID:** 354483 **Organization Type:** Unaffiliated Individual
Representative Quote: I also fear how crowded our dog parks will become. Our local parks are too small for proper exercise and, with more dogs pushed into them, may also cause further aggression due to crowded conditions. It will also undoubtedly lead to more spread of contagious diseases, such as giardia and parvo, which are already all too prevalent in San Francisco.

Corr. ID: 2402 **Organization:** *Not Specified* **Comment ID:** 358899 **Organization Type:** Unaffiliated Individual
Representative Quote: Just about one in every three households in San Francisco has a dog, and this is going to dramatically impact San Franciscans. It is also going to impact city parks, because if this proposal passes hundreds upon hundreds of people and their dogs are going to flood places like McLaren Park and Golden Gate Park.

Corr. ID: 2686 **Organization:** *Not Specified* **Comment ID:** 357066 **Organization Type:** Unaffiliated Individual
Representative Quote: The new plan does not adequately analyze the impact of the preferred alternative on nearby parks. The public and the San Francisco Board of Supervisors requested this analysis in 2011. The new plan claims that, because some off-leash space will still be available in the GGNRA, albeit much smaller, most people will continue to walk their dogs there and not move to nearby city parks. No evidence is given to support either assumption. The GGNRA has not adequately studied the dispersion effect of its plan on local communities, neighborhoods and residential areas. These include parking, traffic congestion, driving patterns and increased miles traveled to reach dog-friendly areas

Corr. ID: 5280 **Organization:** *Not Specified* **Comment ID:** 362871 **Organization Type:** Unaffiliated Individual
Representative Quote: Unfortunately, Lafayette Park can barely accommodate the high volume of dogs it receives daily, as evidenced by the grass being completely run down in the off leash dog area. I am certain that the situation at Lafayette Park would worsen if the off leash areas of the GGNRA were further restricted.

Response: NPS conducted a survey in the summer of 2012 to measure customer satisfaction related to dog walking at GGNRA (NPS 2012b). The GGNRA Dog Walking Satisfaction Visitor Study (NPS 2012b) evaluated the potential for redistribution of use based on access changes. The survey was completed in response to public comments received on the draft plan/EIS. The results of this survey were used to determine what other parks (referred to as nearby dog walking areas) the visitors would choose to visit if on-leash or off-leash dog walking was limited as a result of this plan/EIS. Using the results of this survey, a more detailed evaluation of the potential impacts (to natural resources and visitor experience) at nearby dog walking areas identified in the survey was completed and is described in chapter 4 of the final plan/EIS. Specifically, overcrowding of the dog play areas at nearby dog walking areas leading to the possibility of a reduced overall visitor experience was considered as well as impacts to the existing natural habitats at these areas. However, it should be noted that none of the GGNRA sites included in the draft plan/SEIS would prohibit dog walking, and that although the total area open to dog walking under voice control in the preferred alternative would be less than in alternative A, eight (8) VSCAs in six (6) park areas would provide areas open to voice & sight control dog walking, and those areas would include beaches and large grassy or open areas.

CONCERN STATEMENT: (Concern ID: 53373) The implementation of the dog management plan would not impact dog walking within city parks, as these areas are being used by both off-leash and on-leash dog walkers. Commenters noted that non-compliance with dog walking regulations occur within the public city parks and that city parks are already overrun with off-leash dog walkers. Commenters also noted that this makes the opportunity to find recreational activities without dogs in these areas difficult.

Representative Quote(s):

Corr. ID: 141 **Organization:** *Not Specified* **Comment ID:** 346304 **Organization Type:** Unaffiliated Individual
Representative Quote: Many dog fanatics have argued that the new ggnra dog walking proposed rules would have an impact on the city lands however this was far from true.

During the government shutdown with park lands being not or less accessible, there were increases in problems in the SF city parks. There were still a lot of dogs but not there really was no appreciable change. I think the government shut down proved that the new ggnra rules (which would provide more dog areas than during the government shut down) would not adversely affect the city lands.

Corr. ID: 1848 **Organization:** *Not Specified* **Comment ID:** 354347 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly agree with the idea of this plan. However, from what I can see, there is no mention of Stern Grove Park anywhere. I live in the area, and I cannot take my kid to Stern Grove, because, despite the fact that this park has its own dog play area, the off-leash dogs are everywhere - kids playground included. This is not safe.

My concern is that after the other city parks become more restricted towards the off-leash dogs, there would be even more off-leash dogs in Stern Grove, which would basically turn it into one huge dog park, neighborhood children be damned. So my suggestion is to try to make off-leash/on-leash restrictions and clear markings a citywide project, to

save other parks, and especially Stern Grove, from becoming exclusively dogs playgrounds.

Corr. ID: 6631 **Organization:** *Not Specified* **Comment ID:** 368438 **Organization Type:** Unaffiliated Individual
Representative Quote: This section is written with apparently zero knowledge of the actual situation of off-leash dog use of San Francisco City Parks. Although official policy limits off-leash dog use to certain designated areas within specific parks, in actual fact there is almost no enforcement of this policy. For example, Pine Lake/Stern Grove is essentially a dog park. All of the negative consequences discussed in the SEIS in the event of dog management in GGNRA more restrictive to off-leash dog walking are already occurring in Pine Lake/Stern Grove, for example. The authors of the EIS need to be informed that most off-leash dog walkers in San Francisco ignore restrictions on off-leash dog walking in City parks.

In addition, this section also needs to cover the impact of various alternatives on other user groups, comprising approximately 90% of GGNRA visitors, who might need to seek alternative areas outside of GGNRA based on dog management alternatives that fail to protect their safety or visitor experience from off-leash dog activity.

Corr. ID: 6631 **Organization:** *Not Specified* **Comment ID:** 368397 **Organization Type:** Unaffiliated Individual
Representative Quote: In San Francisco, leash laws are almost never enforced in any of the City parks, and many parks, such as Pine Lake Park, are defacto dog parks. For San Francisco residents wishing to pursue an outdoor activity outside the presence of off-leash dogs, there are extremely limited possibilities for enjoying the outdoor environment. The EIS should discuss the limited options for outdoor space not just for dog walkers but for all visitor groups, especially visitor groups especially vulnerable to safety risk from off leash dogs, including: children; the elderly; the physically disabled; equestrians; hand gliders; joggers; etc.; and those who wish to have an outdoor experience without being harassed or disturbed by off leash dogs, such as hikers and naturalists.

Corr. ID: 6639 **Organization:** *Not Specified* **Comment ID:** 368116 **Organization Type:** Unaffiliated Individual
Representative Quote: The idea that dogs will crowd interior parks when the GGNRA restricts off-leashes use is LUDICRIOUS! Dog's owners already dominate public parks, fields, courts, slopes; this practice will not change. Owners go to beaches and to parks with their dogs strictly at the CONVENIENCE to owners, not the preferences of dogs. Parks are convenient for the daily toileting of dogs... beaches are a nice but not necessary ventures. Parks have always and will always take the brunt of this misuse.

Response: The dog management plan will add education and enforcement to ensure that dog walkers are in compliance with the rule. In addition, multiple dog free areas have been established throughout the park to ensure a variety of visitor experiences are available in GGNRA.

MB1400 - Muir Beach: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53252) Many commenters believe that dogs should be allowed off leash at Muir Beach. Several commenters offered suggestions for making off-leash access for dogs a more feasible option, such as seasonal closures when coho salmon and steelhead trout are present in the area; allowing off leash dogs on the beach while restricting more environmentally sensitive areas; restricting dogs only at high-volume times; limiting the number of dogs per walker; restricting a ROLA to the southern end of the beach to protect sensitive resources; and fencing the lagoon to protect it from dogs and humans.

Representative Quote(s):

Corr. ID: 324 **Organization:** *Not Specified* **Comment ID:** 350586 **Organization Type:** Unaffiliated Individual
Representative Quote: Muir Beach - Dogs should be allowed off-leash seasonally when coho, steelhead are not in the seasonal creek/lagoon area.

Corr. ID: 989 **Organization:** *Not Specified* **Comment ID:** 354362 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to urge you to allow dogs to continue to use Muir Beach off-leash. I respectfully request that the beach area itself at Muir Beach be made a ROLA. Please, please, allow dogs to continue to play off-leash on the beach itself, while restricting their access to other, more sensitive areas as necessary.

Corr. ID: 2751 **Organization:** *Not Specified* **Comment ID:** 357185 **Organization Type:** Unaffiliated Individual
Representative Quote: I support allowing off-leash dog(s) at Muir Beach. I believe that it is appropriate to limit the number of off-lease dogs to perhaps 1- or 2-dogs per adult; while a higher limit of leashed dogs per adult may be considered. I propose that at all times; dogs shall be under voice control by the owner/adult and any dogs not exhibiting

control shall be immediately leashed.

Corr. ID: 3556 **Organization:** *Not Specified* **Comment ID:** 359196 **Organization Type:** Unaffiliated Individual
Representative Quote: If you must regulate dogs on Muir Beach, do so only at high volume times, not the vast majority of the time when the beach is practically empty.

Corr. ID: 3938 **Organization:** *Not Specified* **Comment ID:** 360094 **Organization Type:** Unaffiliated Individual
Representative Quote: If alternative E is still felt to be too restrictive, at least a hybrid between alternatives E and F might work. ROLA for the south main beach, leash control for the north part up to the creek. However, this allows dog walkers easier access to Little Beach during low and moderate tides, which alternative E would not. And of course, leashed dogs flush birds also.

Corr. ID: 6392 **Organization:** Marin Conservation League **Comment ID:** 366083 **Organization Type:** Unaffiliated Individual
Representative Quote: Under Alternate F, the NPS Preferred Alternative for Muir Beach is generally appropriate for that site to protect the restored habitat at the mouth of Redwood Creek and several sensitive species. The Preferred Alternative in the Draft Supplemental EIS allows access for dogs on leash on the beach. MCL believes that an unfenced ROLA should be designated on the southern portion of the beach. This provision would still ensure protection of sensitive resources and at the same time offer a practical solution to dog-owning residents of Muir Beach who have long-frequented the beach. The large expanse of Rodeo Beach provides that opportunity, but it is distant from Muir Beach.

Response: VSCAs would not be established at Muir Beach due to the small size of the site and sensitive resources. Dividing the beach to allow off-leash only on the southern portion of the beach would not be feasible to maintain and it introduces issues with visitor experience. It isn't feasible to fence the entire creek outlet due to inlet shifts and sand movement; and, the fence gets buried. Please see chapter 2, Preferred Alternative for Muir Beach for additional rationale.

CONCERN STATEMENT: (Concern ID: 53254) Commenters suggested banning dogs from Muir Beach or having a large area at the beach where no dogs would be allowed.

Representative Quote(s):

Corr. ID: 3876 **Organization:** *Not Specified* **Comment ID:** 360006 **Organization Type:** Unaffiliated Individual
Representative Quote: re Muir Beach, I'd like to see dogs banned because it's such a small beach. But I think on long beaches, such as Limantour beach in west Marin, they should be allowed on certain sections

Corr. ID: 5304 **Organization:** *Not Specified* **Comment ID:** 362929 **Organization Type:** Unaffiliated Individual
Representative Quote: At Muir Beach, I would like to enjoy the beach without being surrounded by dogs. As it is now, I do not go to Muir Beach nearly as often as I would if dogs were more restricted on the beach. The dogs are barking, running fast and wild, and seem to outnumber human beings. There should be a large area at the beach where no dogs are allowed and people could rest, nap or picnic without staying on a constant vigilant watch for dogs running over their blankets or getting into their food, fighting, etc. I love the beach, and Muir Beach is the closest to my house but it seems so unfair that I just can't enjoy it without the never ending hyper activity of dogs.

Response: Alternative D was originally chosen as the preferred alternative for Muir Beach in the draft plan/EIS; however, after considering public comments, the preferred alternative was modified to allow on-leash dog walking along the connecting bridge, on the beach, and the proposed Muir Beach Trail and Kaashi Way. Allowing on-leash dog walking on the beach would provide dog walkers a coastal beach experience while improving visitor safety and better protecting the native wildlife. For more information please see chapter 2 of the final plan/EIS, preferred alternative for Muir Beach.

CONCERN STATEMENT: (Concern ID: 53256) Commenters expressed the need for access with their dogs out of Muir Beach to the nearest town of Mill Valley. This would encourage visitors to walk to the recreation area and provide a safe route to do so. Suggested trail connections include Muir Beach-Coastal Trail and Fire Road-Coyote Ridge Fire Road-Miwok Fire Road and Muir Beach-Diaz Ridge-Miwok Fire Road. In addition commenters would like a loop trail from Muir Beach - Coastal - Coyote Ridge - Middle Green Gulch or Green Gulch Fire Road - Muir Beach.

Representative Quote(s):

Corr. ID: 5005 **Organization:** *Not Specified* **Comment ID:** 361996 **Organization Type:** Unaffiliated Individual
Representative Quote: Trail/Fire road access from Muir Beach to nearest town
 Residents and their dogs need access on foot out of Muir Beach to Mill Valley (the nearest town) for recreation and

safety. Two trail suggestions:

A) Muir Beach - Coastal trail & Coastal Fire Road - Coyote Ridge
Fire Road - Miwok Fire Road.

B) Muir Beach - Diaz Ridge - Miwok Fire Road.

Both would connect to Homestead trails and allow access to Mill Valley.

Create On-leash Loop Trail

Provide a loop trail as opposed to dead end trails to allow for a recreational experience for the user. We desperately need a loop from Muir Beach and a suggested loop is:

Muir Beach - Coastal - Coyote Ridge - Middle Green Gulch or
Green Gulch Fire Road - Muir Beach

This loop is about 3 miles and would provide excellent exercise for both owner and dogs. Green Gulch fire road or middle Green Gulch trail would be the link required to make the loop.

Fire Road Access

The GGNRA fire roads are on average 12 feet wide allowing for a variety of users, including those with dogs, to safely share the road and are accessible from many neighborhoods and locations outside the GGNRA, encouraging people to walk directly into the recreation area instead of driving to the GGNRA or to other park spaces.

Response: The trails suggested by commenters for dog walking transect contiguous native habitat for wildlife and include native plants. They are open to hiking to local destinations, just not with a dog. Kaashi Way, however, will be added for on-leash dog walking, providing both a loop trail as well as a more accessible trail from Muir Beach and the local community.

MH1400 - Marin Headlands: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53257) Some commenters believe dogs should be completely banned from Marin Headlands, noting the uniqueness of the natural resources in this area, especially so close to a major city. One commenter requests that the areas where dogs are allowed be reduced to provide some recreation areas free of dogs.

Representative Quote(s):

Corr. ID: 3321 **Organization:** Not Specified **Comment ID:** 358144 **Organization Type:** Unaffiliated Individual

Representative Quote: The Marin Headlands trails have a diverse mix of plant and animal species that should be protected from the presence of dogs. It is uniquely possible at the Headlands to experience complex ecosystem diversity including chance encounters with animals unusually near a major city. The presence and/or recent presence of dogs whether on or off leash seriously limits those opportunities and degrades the visitor experience, to say nothing of the potential harmful influence of the presence of dogs on these plants and animals. I would urge you to consider a no dogs policy on Marin Headlands trails. Under Alternative F dog walkers would be free to let dogs off leash along the beach there, and that seems compromise enough.

Corr. ID: 4007 **Organization:** Ca Native Plant Society **Comment ID:** 405810 **Organization Type:** Unaffiliated Individual

Representative Quote: Marin Headlands and Crissy Field shd not allow dogs on or off leash on trails and beaches in these areas to protect plants, wildlife and people; allowing them the freedom of some protected space. With protecting these areas you have welcomed the return of many wild visitors that shd not be disrupted from their feeding on migration by frolicking dogs and their owners. Dogs roam everywhere these days lets save some space where we are free from the effects of there presence.

Corr. ID: 5304 **Organization:** Not Specified **Comment ID:** 362932 **Organization Type:** Unaffiliated Individual

Representative Quote: In Mill Valley, dogs are on every trail except Tennessee Valley main trail. I'd like to be able to hike or run Miwok and Coyote Ridge and Coastal trails without dogs running free.

Corr. ID: 5689 **Organization:** Not Specified **Comment ID:** 520330 **Organization Type:** Unaffiliated Individual

Representative Quote: So, I was hiking Miwok to Coyote Ridge Trail yesterday, in Tennessee Valley, and there were so many dogs. Wildlife viewing is nil. Just a few brave little sparrows. One woman got way ahead of her dog on the trail, and the dog was digging into some little creatures' burrow just off the trail. You can not depend upon owners to

control their dogs. These places are special because they are wild. Don't let them become devoid of all wildlife, thanks to the proliferation of dogs.

Response: The preferred alternative allows both an on-leash dog walking and no-dog experience while still protecting sensitive resources. Please see chapter 2, Preferred Alternative for Marin Headlands for additional rationale. Recreational opportunities for a no dog experience abound in the Marin Headlands, including in areas of sensitive and contiguous resources where dog walking is restricted.

CONCERN STATEMENT: (Concern ID: 53259) Commenters expressed a desire for loop trails where dogs would be allowed, as opposed to dead end trails.

Representative Quote(s):

Corr. ID: 6173 **Organization:** *Not Specified* **Comment ID:** 365724 **Organization Type:** Unaffiliated Individual

Representative Quote: Make more trails and access!!!! Provide a loop trail as opposed to dead end trails to allow for a recreational experience for the user.

Response: Additional trails to create loops would not be feasible in order to meet a plan objective of preservation natural resources. The Marin Headlands contains contiguous habitat and mission blue butterfly habitat that would be impacted by dog walking. Please see chapter 4 of the dog management final plan/EIS, which broadly describes the environmental studies used, as well as their applicability per site.

CONCERN STATEMENT: (Concern ID: 53260) Commenters feel that a variety of visitors are able to use Marin Headlands without issue and wish to have on-leash dog walking areas include all of Coyote Ridge, the Coastal Trail between Rodeo Beach and Muir Beach, the Bobcat Trail and the Tennessee Valley Trail. Commenters also desire more trails open to dogs to accommodate walking from neighboring communities to recreation areas, instead of driving to these areas.

Representative Quote(s):

Corr. ID: 545 **Organization:** *Not Specified* **Comment ID:** 351901 **Organization Type:** Unaffiliated Individual

Representative Quote: The Coastal Trail between Rodeo Beach and Muir Beach is the only extensive rigorous hiking trail open to dogs in GGNRA. Please keep it available.

Corr. ID: 545 **Organization:** *Not Specified* **Comment ID:** 351899 **Organization Type:** Unaffiliated Individual

Representative Quote: The Miwok fire road between Panoramic Highway and Coyote Ridge. This trail is used extensively by hikers, bikers and dogs and everyone just seems to get along. I would suggest extending the area allowed by dogs to include the small steep stretch up to the top of Coyote Ridge on the Coyote Ridge Trail.

Corr. ID: 2420 **Organization:** *Not Specified* **Comment ID:** 368492 **Organization Type:** Unaffiliated Individual

Representative Quote: I can't take my dog overland because the hiking trails don't permit dogs. Plus, I think the Coastal Trail and/or fire roads should be open to dog owners so we can visit places like Pirates Cove. I used to go there and picnic and pick up trash. But now I don't go because I cannot take my dog there. I can't believe that if a person were hiking the coastal trail that he/she couldn't walk the entire length with their dog companion-because it would be against the law. Why? I've been on trails in Marin that are so overgrown that the path is barely visible through the vegetation. Animals and their owners help keep these trails open and groomed. If anything, the ticks and poison oak are the greatest hazards. Why don't you consider other solutions (e.g., permits for dogs to be on trails)? I don't see the harm that animals have on the trails. For example, Tennessee Valley to Tennessee Cove: if a dog is on leash, it's not going to spook a horse or scare off animals any more than a bunch of kids running around. In the past, I used the area often, but now that it doesn't permit dogs, I have stopped using it. It doesn't sit well with me. I find it troubling that my dog cannot accompany me on this route.

Corr. ID: 3372 **Organization:** *Not Specified* **Comment ID:** 358270 **Organization Type:** Unaffiliated Individual

Representative Quote: The Marin Headlands is easy. Put an off leash time at Rodeo Beach. There are student groups there during the week. Off leash should be allowed until they would be going down, say 9:00 or 10:00. The only other change would be to allow dogs on leash on the Bobcat Trail so you could go from Fort Cronkite to the Alta trailhead. .

Corr. ID: 5221 **Organization:** *Not Specified* **Comment ID:** 362655 **Organization Type:** Unaffiliated Individual

Representative Quote: Ideally, the GGNRA should be ADDING dog-friendly trail access from the Miwok, down Coyote Ridge to the Coastal Fire Road, so that people can come and go between Mill Valley and Muir Beach without using a car! This is just common sense, and better for the environment, and would truly serve the needs of communities adjacent to the GGNRA!

Corr. ID: 6683 **Organization:** Marin Humane Society **Comment ID:** 369606 **Organization Type:** Unaffiliated Individual

Representative Quote: Mann Headlands Trail- We recommend the current status of this site be maintained and we support Alternative A. We would like to see on-leash access considered on the Tennessee Valley Trail.

Response: The preferred alternative was modified to include additional on-leash dog walking opportunities within the Marin Headlands while still protecting sensitive resources. Please see chapter 2, Preferred Alternative for Marin Headlands for additional rationale.

CONCERN STATEMENT: (Concern ID: 53261) Commenters are concerned with the reduction of trail access under alternative E when compared to current conditions.

Representative Quote(s):

Corr. ID: 1965 **Organization:** Not Specified **Comment ID:** 354628 **Organization Type:** Unaffiliated Individual

Representative Quote: Lastly with regards to this area, the alternative E map shows a significant reduction in dog-available land vs. the status quo. The document states that maps labeled E are supposed to provide for the maximum of dog access. In this case the maximum access would be access to all trails - and not a substantially reduced area.

Response: A reduction in the area for on-leash dog walking is necessary in order to meet project objectives of protecting native wildlife and their habitats. The Marin Headlands contains contiguous habitat and mission blue butterfly habitat that would be impacted by dog walking.

MP1400 - Mori Point: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53262) Several commenters suggested allowing on-leash dog walking on the Bootlegger Steps, as the steps allow for a continuous loop walk at Mori Point.

Representative Quote(s):

Corr. ID: 336 **Organization:** Not Specified **Comment ID:** 350612 **Organization Type:** Unaffiliated Individual

Representative Quote: Allow dogs on Bootlegger steps at Mori Pt - healthy for visitors and dogs. Completes a loop of 4 miles.

Corr. ID: 6211 **Organization:** Not Specified **Comment ID:** 366124 **Organization Type:** Unaffiliated Individual

Representative Quote: We are dog owners and are very saddened to learn of the planned severe restrictions for on-leash dog walking in the GGNRA in Pacifica. We would be very happy if you will allow leashed dogs on the Bootlegger Steps at Mori Point. We always liked to go down a different trail - the road going east should be fine for dogs since it's very wide. If these are not kept open for dogs we won't be walking there as we won't go without our dog and we need uphill walking.

Response: Dogs will not be allowed on Bootlegger Steps since the steepness of the steps presents a safety concern, and this would offer the only dog free trail experience up to the Mori Point bluff from the north, the most popular access point of origin for hiking. However, from that same access point, the Coastal trail will provide dog walking trail access to the bluff. And, the preferred alternative was modified to include an additional on-leash dog walking opportunity on the bluff, the Mori Headlands trail.

CONCERN STATEMENT: (Concern ID: 53263) Commenter would like to see dogs eliminated from the Bootlegger Steps to provide better safety for other visitors.

Representative Quote(s):

Corr. ID: 8 **Organization:** Not Specified **Comment ID:** 337963 **Organization Type:** Unaffiliated Individual

Representative Quote: My comment is on dog use plans for Mori Point.

If all dog owners were walking docile pets, then perhaps this would not be important. However, some dogs are excitable and may behave in ways that are upsetting or frightening to human users, particularly cyclists or those with small children. Most dog owners will self-police, and choose the higher-ground bypass trails if they know their dogs tend to bark at children or lunge at other dogs or cyclists.

There are other possibilities that could further protect and preserve use for everyone. For example, there is no need for dogs to be allowed on Bootleggers Steps (dogs don't need stairs) - - but you don't have any proposed maps that appear to differentiate between areas designed for the comfort of humans and areas likely to be popular among dog walkers.

Response: Dogs will not be allowed on Bootlegger Steps since the steepness of the steps presents a safety concern, and this

would offer the only dog free trail experience up to the Mori Point bluff from the north, the most popular access point of origin for hiking.

CONCERN STATEMENT: (Concern ID: 53264) Several commenters would like to see off-leash areas established at Mori Point, including Upper Mori Trail.

Representative Quote(s):

Corr. ID: 333 **Organization:** *Not Specified* **Comment ID:** 350601 **Organization Type:** Unaffiliated Individual

Representative Quote: Upper Mori Trail - Dirt path used by dog walkers and bicyclists. No strollers, few kids (generally, kids with dogs). Excellent candidate for off-leash as well as on-leash area up to Headlands

Corr. ID: 1460 **Organization:** *Not Specified* **Comment ID:** 352820 **Organization Type:** Unaffiliated Individual

Representative Quote: I love to let my dog go off leash because I know that my dog(s) is very friendly and does not bother anybody that ride bicycle or jogging. I have a chance to meet lots of friendly people that do not mind my dog or any other dogs that go off leash. Most of the time the dog's owner know whether their dogs are good enough to go on without leashes. They have freedom in their own way without bothering any one. Please, I will appreciate very much if you will consider have Mori Point for OFF-LEASH dogs.

Response: No off-leash areas would be established at Mori Point in order to protect sensitive resources and for safety concerns. However, dog walking use at that .02 acre portion of Sharp Park Beach under NPS may be considered for a change in use if other agencies with broader beach jurisdiction change their current management and use designations.

CONCERN STATEMENT: (Concern ID: 53265) Many commenters requested keeping the trails of Mori Point open to access with dogs, with emphasis on Mori Point Trail and Upper Mori Trail. Several commenters expressed a desire for trails that form loops as opposed to dead end trails. One commenter recommended altering Mori Bluff Trail to form a loop.

Representative Quote(s):

Corr. ID: 2564 **Organization:** *Not Specified* **Comment ID:** 359089 **Organization Type:** Unaffiliated Individual

Representative Quote: PLEASE keep on leash dog access on Upper Mori trail to Sweeny Ridge. This is a wide trail with very few hikers - and those that I do encounter usually also have a dog. In urban areas, an important reason to conserve of open space is to provide residents like me a place to hike/exercise. PLEASE keep on leash dog access on the wide but steep trails near Mori point: While my usual hike with my dog (on leash) is upper Mori trail to Sweeny Ridge, at times when it has been very rainy this trail is too muddy and slippery to use safely, so I then like to hike to Mori Point.

Corr. ID: 5252 **Organization:** *Not Specified* **Comment ID:** 362814 **Organization Type:** Unaffiliated Individual

Representative Quote: Mori Point: At Mori Point, I think it would be important to be able to have a "loop" trail. At this time, there are only trails that allow for one way in and out when walking dogs. The Mori Headlands trail should be open to leashed dogs as well. The Mori Bluff trail, if possible, could provide a loop trail in the area for leashed dogs. Dogs on leash would not disturb habitat in these areas.

Corr. ID: 6645 **Organization:** Pacifica City Council **Comment ID:** 368198 **Organization Type:** Unaffiliated Individual

Representative Quote: Mori Point:

We suggest that the Mori Point Headlands Trail be modified to allow on-leash dog access. We also recommend connecting the Mori Point Bluff Trail to provide a loop. We believe the likelihood of either the redlegged frog or the San Francisco garter snake being harmed or negatively affected is extremely remote

Response: The preferred alternative would allow on-leash dog walking on some of the trails at Mori Point. Trails in areas with sensitive resources would not allow dog walking. The Upper Mori Trail was considered for on-leash dogs to complete an on-leash option for dog walkers, but it would create a cross-over opportunity for visitors to the Lishumsha Trail resulting in an enforcement and compliance issue, something the park does not want to risk given the sensitive resources along the Lishumsha Trail. The Upper Mori Trail also contains many sensitive resources and currently provides one of the few no-dog experiences at Mori Point. The Lishumsha Trail was evaluated for on-leash dog walking to create a loop but this trail traverses SF garter snake and RLF habitat and is a place where species move between habitats; and, it is the most sensitive trail at Mori Point. The Timigtac Trail is an unmaintained trail and would require significant work to bring it up to standards, so it is not considered herein.

MR1400 - Milagra Ridge: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53266) Commenters believe that on-leash dog walking should continue at Milagra Ridge, although some commenters feel dogs should be restricted to Milagra Ridge Road, Fire Road, and the North Spur to allow for a no dog experience and to protect resources. Other commenters feel that on-leash dog walking should be allowed throughout the site.

Representative Quote(s):

Corr. ID: 561 **Organization:** *Not Specified* **Comment ID:** 352640 **Organization Type:** Unaffiliated Individual

Representative Quote: I would maintain that continued walking on leash on all Milagra ridge trails would be advisable and not detrimental to anything I have seen over the years.

Corr. ID: 2291 **Organization:** *Not Specified* **Comment ID:** 520320 **Organization Type:** Unaffiliated Individual

Representative Quote: I live between Sweeney Ridge and Milagra Ridge in Pacifica and hike there often. I have had dogs run at me and have seen large dogs chase coyote, deer and rabbits. Wildlife cannot be protected without some restrictions on dogs. Unleashed dogs invite conflicts with people and coyotes. I also volunteer in a Wildlife Rehab program and see the effects on birds, skunks, opossums injured because of contact with dogs. I realize that dog owners need a place to walk their pets, but strongly enforcing leash laws and making some sensitive areas no dogs will help wildlife, plants to thrive.

Corr. ID: 2623 **Organization:** *Not Specified* **Comment ID:** 356919 **Organization Type:** Unaffiliated Individual

Representative Quote: In the upper area of Milagra Ridge, I suggest keeping on leash only to Milagra Ridge Road and Fire Road on the upper section and the North Spur, everything else no dogs at all.

Response: On-leash dog walking will be allowed on the Milagra Ridge road and Milagra Battery trail, not through sensitive species habitat on single track trails. This would also allow for a dog free experience on those single track trails. Please see chapter 2, Preferred Alternative for Milagra Ridge, for additional rationale.

CONCERN STATEMENT: (Concern ID: 53267) Commenters also feel that ROLAs should be established at Milagra Ridge. Suggested ROLA areas include the Fire Trail and the lower, westernmost side of the site below the overlook.

Representative Quote(s):

Corr. ID: 561 **Organization:** *Not Specified* **Comment ID:** 402265 **Organization Type:** Unaffiliated Individual

Representative Quote: In fact, during the day, off leash along the fire trail and road from the ridge to the High School would not seem to be a problem as I rarely (perhaps once per year) see any wildlife anytime later than 2 hours after dawn or two before dusk.

Corr. ID: 2623 **Organization:** *Not Specified* **Comment ID:** 402266 **Organization Type:** Unaffiliated Individual

Representative Quote: Milagra Ridge - Then the lower, most western side below the overlook and below the cable fence, dogs off leash. This keeps the dogs in an area where there will be little impact and limits traffic in the areas of the restoration.

Response: VSCAs would not be established at Milagra Ridge primarily to protect sensitive resources at the site; safety concerns would be an additional concern on trails. Please see chapter 2, Preferred Alternative for Milagra Ridge for additional rationale.

MT1000 - Miscellaneous Topics: General Comments

CONCERN STATEMENT: (Concern ID: 53375) One commenter believes that the high usage of the park by dog owners and dog walkers helps to reduce the presence of marijuana growers, which is a large problem in national parks.

Representative Quote(s):

Corr. ID: 1014 **Organization:** *Not Specified* **Comment ID:** 351435 **Organization Type:** Unaffiliated Individual

Representative Quote: One of the most pervasive problems in national parks is the presence of marijuana growers. High traffic keeps these guys at bay. Dogs have to be walked every day. Which means that they are in a park every single day, creating safety zones wherever they go. The trade off is a little poop, trash cleanup and the occasional dust up. Weighed against pollution from fertilizers, pesticides, herbicides, water theft from streams and dangerous heavily armed criminals wandering around, it seems like a relatively inexpensive means of protecting an area.

Response: That alone would not be a reason to allow a particular use in a national park area. And, marijuana growing is more of a problem in densely-vegetated areas on public lands than typical areas that visitors seek to enjoy the park along the coast.

CONCERN STATEMENT: (Concern ID: 53376) Many commenters expressed concern about the increased traffic that the new restrictions would cause. Dog owners would be traveling longer distances to take their dogs to off leash areas, increasing

congestion, emissions, and impacts on the off leash areas. One commenter stated that current traffic conditions are already a concern.

Representative Quote(s):

Corr. ID: 1896 **Organization:** *Not Specified* **Comment ID:** 354498 **Organization Type:** Unaffiliated Individual

Representative Quote: And finally, this will impact not only my dogs quality of life but mine as well. With less places to walk my dog, I will have to drive farther which impacts emissions. More fuel burned, more cars on the roads per dog owner. Consider the number of people with dogs, how many added cars that is to the streets because we have to drive daily to give our dogs exercise.

Corr. ID: 6167 **Organization:** *Not Specified* **Comment ID:** 365706 **Organization Type:** Unaffiliated Individual

Representative Quote: The plan reduces Marin Headlands Trails by 14.73 miles, specifically it proposes to REMOVE ALL trails leading out of Muir Beach for dogs. This will force our community into their cars to drive a minimum of 20 minutes to access this experience. The highway to/from Muir Beach is already choked and congested on weekends, holidays and sunny days with traffic and tour buses to/from Muir Woods National Monument and the GGNRA.

Response: Following the public comment period for the draft plan/EIS, the preferred alternative was adjusted at some sites to allow additional, geographically logical, dog walking access. Please see chapter 2, preferred alternative, for additional details on access.

As discussed in chapters 3 and 4, NPS conducted a survey in 2012 to measure visitor satisfaction related to dog walking at the GGNRA sites to gather information regarding visitor use of the park by dog owners. This survey, GGNRA Dog Walking Satisfaction Visitor Study (NPS 2012b), evaluated the potential for redistribution of use based on access changes resulting from implementation of this plan/EIS. Nearly half of the respondents indicated that their current round trip travel to their favorite GGNRA sites is up to 10 miles (NPS 2012b, 7). Results of this survey were used to determine what other parks (referred to as nearby dog walking areas) the visitors might choose to visit if on-leash or off-leash dog walking was limited as a result of this plan/EIS. The majority of nearby dog walking areas that visitors would choose to visit are located less than 10 driving miles away from the closest GGNRA site. Impacts to these nearby dog walking areas as well as mileage traveled to these areas is discussed in further detail in chapter 4.

CONCERN STATEMENT: (Concern ID: 53377) Restricting off leash dog walking has the potential to adversely impact local businesses, real estate, and the local economy.

Representative Quote(s):

Corr. ID: 1504 **Organization:** *Not Specified* **Comment ID:** 352933 **Organization Type:** Unaffiliated Individual

Representative Quote: I also worry about the unintended economic and environmental impacts of these decisions. There are thousands of dog owners who use the GGRA every day. If they are no longer able to use this space, they may move to locations that do, which will negatively affect both real estate prices and local business. This is especially true given the fact that many pet owners are high income and highly mobile individuals or couples. Even if they dont move, they will likely drive to locations where their dogs can freely play, increasing both congestion and air pollution.

Corr. ID: 2170 **Organization:** *Not Specified* **Comment ID:** 356094 **Organization Type:** Unaffiliated Individual

Representative Quote: In closing, I want to emphasize that the GGNRA land within Pacifica is adjacent to areas of high population density. Since the incorporation of the City in 1957, the citizens of Pacifica have fought hard to defend keeping their hillsides as open space. It is because of the vigilance of Pacifica's citizens that these tracts of land exist at all to become part of the GGNRA. Historically, Sweeney Ridge was used for cattle grazing and was later proposed for residential housing. Mori Point and Pedro Headlands were badly torn up and eroded because of use by motorcyclists. Over the years, Pacificans have worked hard to help restore native vegetation in these heavily impacted areas. Pacifica does not have a strong commercial tax base. It has been proposed that "Our Ecology is our Economy". If Pacifica is known to tourists as a "dog friendly" town, we will be able to attract many more visitors to enjoy our trails and open space, adding to our economic prosperity. The economic consequences of severely limiting dog access to GGNRA trails are potentially profound to our fiscally fragile community.

Corr. ID: 4562 **Organization:** *Not Specified* **Comment ID:** 360654 **Organization Type:** Unaffiliated Individual

Representative Quote: The impact of your plan on my industry will be huge. Many people will no longer have work. Businesses will fold, debts will go unpaid. people who contribute to society now will find themselves unable to do so anymore.

Response: The final dog management plan/EIS, more broadly, is not expected to have adverse impacts to the economy. Dog

walking both on-leash and off-leash would still occur throughout GGNRA with approximately 1/3 of the miles of beaches and trails available still for dog walking. The final plan/EIS allows dog walkers, both private and commercial, to walk 3 dogs at one time; any dog walker - private or commercial - could also apply for an NPS permit to walk up to 6 dogs. Permits would be issued for up to seven GGNRA park areas. Please see chapter 1, Issues and Impact Topics dismissed for further information on this impact topic dismissed from further analysis.

CONCERN STATEMENT: (Concern ID: 53378) One commenter considers the requirement of a 6-foot leash to be an issue, stating that retractable leashes can provide a better experience for the dog while still allowing the owner to control the dog.

Representative Quote(s):

Corr. ID: 1682 **Organization:** Not Specified **Comment ID:** 353569 **Organization Type:** Unaffiliated Individual

Representative Quote: My last point has to do with the definition of leashed. When hiking or running, it is MUCH easier on both the dog and human to use a retractable leash of about 12. We have hiked/run hundreds of miles with our dog and we know. He does not wander off the trail to any extent that the habitat would be damaged any more than if he were on a 6 leash, and he is perfectly under control when meeting other people or dogs on the trail because we just pull up on the length of the leash. Am I really going to be ticketed on these trails using my retractable leash, when my dog NEVER strays more than a foot to either side of the trail/road?

Corr. ID: 1682 **Organization:** Not Specified **Comment ID:** 353556 **Organization Type:** Unaffiliated Individual

Representative Quote: I also want to say something about leash specifications. We have an adjustable leash for our dog that works VERY well. We make it short when we are passing strange dogs and people, and let it out long when we are away from others. It is unacceptable and narrow-minded to limit leashes to a single (short) length. A responsible dog walker can do perfectly well around both unfriendly humans and dogs with an adjustable leash.

Response: Dog walkers are required to have a six foot leash for every dog under their care, as outlined in chapter 2 under the "Elements Common to Action Alternatives" section, to minimize or to avoid impacts to park resources and other visitors. This requirement is consistent with most other regional and county jurisdictional leash requirements. The use of other types of leashes is also discussed in this chapter under the "Alternative Elements Eliminated from Further Consideration" section.

CONCERN STATEMENT: (Concern ID: 53379) One commenter is concerned about the impact of increased noise at community dog parks from dogs barking and owners calling for their dogs. Conversely, other commenters do not believe that noise from people recreating with their dogs can be distinguished from the other noises associated with a large city setting such as San Francisco.

Representative Quote(s):

Corr. ID: 3994 **Organization:** Not Specified **Comment ID:** 360399 **Organization Type:** Unaffiliated Individual

Representative Quote: Sound pollution from barking dogs? Maybe, if you can hear over the crashing waves, the steady stream of planes departing SFO, and the constant gunfire from The Pacific Rod and Gun Club at Lake Merced.

Corr. ID: 6135 **Organization:** Tamarind Street Resident **Comment ID:** 365580 **Organization Type:** Unaffiliated Individual

Representative Quote: For a large concentration of dogs to collect in the middle of a residential area would lead to a dramatically noisy situations in which barking dogs would disturb all nearby residents. If unacquainted dogs of different breeds, size and sexes mix in this small area, there will be many dog conflicts and much barking. If dogs are under "voice command" and not a leash, that means owners will have to be shouting commands. This will be a major disturbance to the quiet of the street.

Response: Barking repeatedly or howling will be citable violations, under the final plan/EIS, as it is a disturbance of both the visitor experience and of wildlife. This will be an element that is monitored in the park's monitoring management program, which should result in some reduction of noise in dog walking areas.

ND1100 - Non Dog Related Impacts to Park Resources

CONCERN STATEMENT: (Concern ID: 53382) Commenters noted that the impacts of other visitors on resources are greater than or equal to those of dogs, including the impacts of the following park visitors: hikers, bikers (mountain and motorbike users), horses and horseback riders, kite boarders, skateboarders, young people, homeless people, picnickers, families, and children, among other user groups. These groups were reported to leave trash, disturb visitors, cause graffiti, impact sensitive resources, and cause safety concerns. In addition, commenters noted that the impacts of human-based development and events, including NPS management of the GGNRA, on resources within the GGNRA are greater than or equal to the impacts of dogs, including the impacts from the following: races and runs, concerts, construction of parking lots

and other amenities, nearby development, light pollution, fireworks, and NPS vehicle patrols, pollution, and past military uses. Commenters expressed concern with the analysis presented in the draft plan/SEIS regarding the impacts of dogs when compared to other sources of impacts.

Representative Quote(s):

Corr. ID: 276 Organization: Not Specified Comment ID: 350455 Organization Type: Unaffiliated Individual

Representative Quote: Don't even get me started about the amount of horse poop that's left along the running trails. I get police officers on horses help protect us but there are many other non-police horses that roam our trails and they don't appear to be under any mandate that they clean up after themselves. And the trash that people leave ALL OVER THE CITY and PARKS is a real issue, hazard to our health and unsightly mess.

Corr. ID: 719 Organization: Not Specified Comment ID: 353037 Organization Type: Unaffiliated Individual

Representative Quote: I was told by a ranger that it's not the chasing that's a problem but the trampling of their nests. If that is the case, then why don't we close the beach to people, with their careless children and their blankets and coolers and footballs. We have beach patrol in 4x4 trucks, cops on motorcycles, horses, wind pulled carts, tractors moving sand, thousands of walkers, runners and every possible type of beach goer imaginable. If this is really about saving birds then lets do it right and close the entire beach to everything and everyone. Why are we singling out a mostly harmless factor without any formal studies showing that dogs are responsible for a decline in bird population.

Corr. ID: 812 Organization: Dog Adventures Comment ID: 353349 Organization Type: Unaffiliated Individual

Representative Quote: I also find it fascinating that you are so worried about dog walking ruining the environment when I continually find used condoms, human feces, used tampons and sanitary napkins as well as beer bottles, wine bottles and toilet paper all over the Presidio, Baker Beach, and even in the headlands on Alta trail. It is really disgusting and actually unsanitary. I take my kids walking with me and I worry about them touching some of the garbage I find out there.

Corr. ID: 962 Organization: Not Specified Comment ID: 354166 Organization Type: Unaffiliated Individual

Representative Quote: In addition, at the same time GGNRA uses "preserving the environment" as a reason for not allowing dogs off leash (without any scientific evidence that dogs have actually harmed anything), the park service continues to greatly disturb the environment with paved parking lots, proposals for more paved parking lots, concrete restrooms, and by finding ways to bring more and more people into the park.

Corr. ID: 1008 Organization: Not Specified Comment ID: 351417 Organization Type: Unaffiliated Individual

Representative Quote: But if we're doing our homework on this, I think you would find that hikers and other users of our trails within GGNRA have more complaints about the bike riders as they are always more aggressive and rude than any dog or dog owner.

Corr. ID: 1755 Organization: Not Specified Comment ID: 353738 Organization Type: Unaffiliated Individual

Representative Quote: Bikers, birders, hikers all go off trail and there are many more of them but they keep being allowed on more land, while we are losing some of our most wonderful walkie places. I am a birder and can also attest to birders going off-path en masse to peer into nests and pishing to lure birds into the open

Corr. ID: 2691 Organization: Not Specified Comment ID: 357080 Organization Type: Unaffiliated Individual

Representative Quote: Humans, on the other hand, who come for recreation, make a huge amount of trash, which is left not only in the trash bins, but all over the beach. I find bottles, toys, pieces of broken things, along with an array of food packaging. They start fires, let their kids run and scream, chasing birds and ciimbing all over the cliffs, and after all that, leave garbage on the beach.

Corr. ID: 3253 Organization: Not Specified Comment ID: 358031 Organization Type: Unaffiliated Individual

Representative Quote: I think you should focus your energy and efforts on the people riding dirt bikes up and down the hills, ruining the trails, frightening the equine and dog population, and scarring the hills. Dogs do not create the long lasting damage and havoc that dirt bikers do.

Corr. ID: 3783 **Organization:** *Not Specified* **Comment ID:** 359691 **Organization Type:** Unaffiliated Individual

Representative Quote: Vegetation near trails is impacted as much if not more by maintenance than dog incidents. For example, routine mowing along trails, creeks and fence lines may hurt bunch grasses more than all dog incidents. Perspective of impacts of dog walking in comparison to hiking, horseback riding and bicycling impacts seems to be missing in the SEIS, nor is there perspective offered on dog wastes in comparison to the wastes left behind by trail horses or wildlife.

Corr. ID: 3994 **Organization:** *Not Specified* **Comment ID:** 360391 **Organization Type:** Unaffiliated Individual

Representative Quote: Hazardous and offensive dog waste from a handful of irresponsible dog owners? Possibly, but never mind the beach littered with horse waste and human trash, several homeless encampments, and storm water outflows that are covered top to bottom in graffiti.

Corr. ID: 4584 **Organization:** *Not Specified* **Comment ID:** 360990 **Organization Type:** Unaffiliated Individual

Representative Quote: The SEIS seems to select dog walking as a single threat to the GGNRA. What about the negative impact of very large groups that use the spaces (and take over large areas and roadway access) for events, what about the terrible light pollution emitted from the sports facilities at the west end of Crissy Field ?

Corr. ID: 4799 **Organization:** *Not Specified* **Comment ID:** 361559 **Organization Type:** Unaffiliated Individual

Representative Quote: Conversely, there are people with children that disrupt public space and wildlife. They chase birds. They throw things. They have uncontrolled temper tantrums. Their actions are offensive to parents everywhere. Fortunately it's a small group. There are fishermen who station themselves at Ocean beach, blocking the water for for vast stretches from people and wildlife. Fortunately it's only a few most of the time. Groups of people discard trash carelessly, ruining parks and beaches for an overwhelming majority who don't behave so carelessly. I could go on citing any number of people behaving in a manner that is less than helpful.

Corr. ID: 5822 **Organization:** *Not Specified* **Comment ID:** 367538 **Organization Type:** Unaffiliated Individual

Representative Quote: The year round special events at Crissy Field present the most significant environmental impact as many as several million people impact this area. It is not the dogs that have a significant impact here; it is the people and the heavily attended events such as Fleet Week, Americas Cup, corporate fundraisers, etc. that have a deeper and lasting impact on the environment. Additionally, the biggest safety concern at Crissy Field is the bicyclists, primarily tourists who blindly run into people along the promenade. The dogs and their owners are not a safety issue- -there isn't any empirical data in the DSEIS that supports that. I am not saying that there aren't any situations that need attention, but the DSEIS is so biased against off leash dog walking you would think dogs present a daily hazard, which they do not.

Response: The scope of the EIS is limited to dog walking, thus the impacts of other uses are not analyzed as direct impacts, unless they are related to the proposed action (for example, redistribution or increases in visitation of non-dog walkers). NPS realizes that other park uses such as biking, hiking, beach driving, and special events (i.e. Fleet Week) create impacts to park resources; however, impacts described in the final plan/EIS focus on impacts related to dog-walking. Existing conditions includes ongoing effects from other park uses including but not limited to hiking, running, biking, picnicking, beach going, equestrian riders, and special events.

CONCERN STATEMENT: (Concern ID: 53383) Commenters noted that the impacts of other wildlife, both native and non-native, on resources within the GGNRA are greater than or equal to the impacts of dogs, including impacts from coyotes, ravens, gulls, feral cats, mountain lions, and gophers. Commenters noted that the impacts of natural forces on resources within the GGNRA are greater than or equal to the impacts of dogs, including the impacts from wind, storms, erosion, and invasive species. Commenters felt these resources altered the habitat and impacted resources.

Representative Quote(s):

Corr. ID: 1384 **Organization:** *Not Specified* **Comment ID:** 352424 **Organization Type:** Unaffiliated Individual

Representative Quote: The impact of humans and dogs at Fort Funston as I've observed appears to be less than that of the ravens and the wind.

There used to be several bird species there: sparrows, swallows, gulls, hawks, even a pair of great horned owls. It was the ravens that impacted those species, not dogs.

If not for the ravens pulling things out of the dustbins, there would be less paper and plastic on the ground as well.

Corr. ID: 2420 **Organization:** *Not Specified* **Comment ID:** 368486 **Organization Type:** Unaffiliated Individual
Representative Quote: It's my belief that people, natural erosion, rising sea level, man-made pollution, and urban sprawl are the greater factors at play (in terms of threatening our natural resources). I think the GGNRA should focus its concern with reducing pollution, maintaining trails, restoring native vegetation, providing community education and outreach, and monitoring (and fining) litterbugs who trash our resources.

Corr. ID: 2462 **Organization:** *Not Specified* **Comment ID:** 358964 **Organization Type:** Unaffiliated Individual
Representative Quote: I am so tired of the Audubon Society blaming the dogs for everything. What about the coyotes, raccoons, skunks and crows that eat the eggs of shorebirds in the nesting areas. Should they have leashes?

Corr. ID: 5289 **Organization:** *Not Specified* **Comment ID:** 362892 **Organization Type:** Unaffiliated Individual
Representative Quote: In my many days at Crissy, I have never seen dogs chasing birds. They leave each other alone. There is a large group of geese that visit the big lawn regularly and this provides an environmental concern greater than the very rare and occasional dog (or even human!) poop. When our son was exposed to goose poop, he suffered serious diarrhea that required antibiotic treatment.

Corr. ID: 5830 **Organization:** *Not Specified* **Comment ID:** 364376 **Organization Type:** Unaffiliated Individual
Representative Quote: The coyotes are more damaging to the birds than any dog I've ever seen in 20 years of going to Ocean Beach or Chrissy Field. The birds can fly away when anything goes near them.

Corr. ID: 5852 **Organization:** *Not Specified* **Comment ID:** 364405 **Organization Type:** Unaffiliated Individual
Representative Quote: Feral cats are far more damaging to bird populations in the Bay Area than dogs walking on the beach. Controlling feral cat populations would be a more effective way to help ensure healthy bird populations in the Bay Area.

Corr. ID: 5958 **Organization:** *Not Specified* **Comment ID:** 364792 **Organization Type:** Unaffiliated Individual
Representative Quote: Mountain lions: My dog has found enough parts of adult deer to make it clear that a large predator forages in this area. The S.F. Chronicle has reported mountain lion sightings in this area, and the local paper again on Nov. 13th

Corr. ID: 6287 **Organization:** *Not Specified* **Comment ID:** 366430 **Organization Type:** Unaffiliated Individual
Representative Quote: In fact I believe - and submit the same 'proof' - that both wind and natural erosion have changed the area around Fort Funston more so than any humans and their canine companions. Also seen over 2 decades is the unacceptable, illegal and rude behavior of weekend and holiday visitors and young school age children who swarm after school over the dunes through and into the existing fenced off areas of habitat recovery and dune ridge protection. Also the weekends and holidays leave more food-related trash than any amount of unclaimed dog poop during the rest of the year.

Corr. ID: 6622 **Organization:** *Not Specified* **Comment ID:** 367474 **Organization Type:** Unaffiliated Individual
Representative Quote: Gophers cause more damage to plants than dogs do.

Corr. ID: 6689 **Organization:** *Not Specified* **Comment ID:** 369405 **Organization Type:** Unaffiliated Individual
Representative Quote: Beyond this, the California Gull is noted as being present. This is of interest because a recent study using surveillance cameras at plover nesting sites in San Francisco Bay documented California Gulls as being responsible for 25% of all predation of plover nests . (Robinson-Nilsen, Caitlin¹, Jill Bluso Demers¹, Cheryl Strong², and Scott Demers³; ¹San Francisco Bay Bird Observatory, crobenson@sfbbo.org; ² U. S. Fish and Wildlife Service, Don Edwards San Francisco Bay National Wildlife Refuge; ³ HT Harvey and Associates DETERMINING THE EFFECTS OF HABITAT ENHANCEMENTS AND PREDATORS FOR WESTERN SNOWY PLOVER). California Gulls are new to some of these areas-could the decline in the number of plovers at Crissy Field be related to an increase in the presence of California Gulls? This study makes no attempt to ascertain if there is any such correlation.

Response: The park serves as a refuge for wildlife; and has taken measures to curb its feral populations. The GGNRA Dog Management Plan/EIS is intended to analyze impacts to park resources from dog walking activities, not other wildlife or

animals, which, generally speaking, NPS is required to protect. Therefore, impacts to resources related to other native and non-native species will not be analyzed in this document as direct impacts. Existing conditions includes ongoing effects from other wildlife and natural processes.

CONCERN STATEMENT: (Concern ID: 53386) Two commenters stated that Golden Gate National Recreation Area does not have the right to dictate management of the tidewaters, as they are under California State law, which does not have leash laws.

Representative Quote(s):

Corr. ID: 4993 **Organization:** Stephen S. Sayad, Attorney at Law **Comment ID:** 361897 **Organization Type:** Unaffiliated Individual

Representative Quote: The GGNRA has no power to regulate the tidelands it manages in the GGNRA. The GGNRA does not own these tidelands; they are held in trust by the State of California for the recreational uses of the citizenry. The management permit between the GGNRA and the California State Lands Commission only allows imposition of federal law to the extent it does not conflict with State law. There have never been any on-leash laws on the tidelands in the Bay Area managed by the GGNRA. Accordingly, State and federal law conflict on this issue and, pursuant to the management permit, the GGNRA must follow State law in attempting to change the historical uses of these tidelands. The California Administrative Procedures Act is far more exacting than federal law when it comes to changes in land management that are significant or highly controversial. As a result, the GGNRA, in following federal law, has violated the management permit and forfeited management over the tidelands it manages.

Response: The NPS has the authority to manage tide and submerged lands along the Pacific coast and in San Francisco Bay that are addressed in the plan. The GGNRA boundary extends 1/4 mile offshore into the Pacific Ocean. In 2009, the California State Lands Commission issued a lease to the NPS for tide and submerged lands along the Pacific coast. The lease area begins at the San Francisco//San Mateo County line and extends through the Marin Headlands. The lease allows NPS to enforce its regulations in these areas. Tide and submerged lands off shore from Crissy Field are owned by the United States and are subject to NPS jurisdiction. The NPS has similar ownership of and jurisdiction over tide and submerged lands at Fort Baker and in several other areas of San Francisco Bay.

CONCERN STATEMENT: (Concern ID: 53387) Delete

Representative Quote(s):

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 366033 **Organization Type:** Unaffiliated Individual

Representative Quote: The SEIS does not justify why commercial dog walking (CDW) is included as a component of the Preferred Alternative. A proper evaluation should examine whether commercial dog walking is consistent with applicable laws, executive orders, regulations, and policies, which in this case include the Organic Act, the GGNRA enabling legislation, the National Parks Omnibus Management Act of 1998, the National Environmental Policy Act, NPS Management Policies 2006, and Director's Order #53.

While some may argue that dog walking is part of the mission of the GGNRA and was intrinsic in the "values or purposes for which the park was established", no one can credibly argue that the commercial enterprise of dog walking- i.e., walking a dog that you do not own for financial gain-can in any way be considered part of the GGNRA's mission or core values or purposes.

Commercial dog walking does not meet the criteria to be authorized as an appropriate activity for national parklands. It constitutes a commercial exploitation of park resources (both in environmental impacts and personnel to manage the activity). To our knowledge, commercial dog walking is not allowed in any other unit of the National Park System. Rather, where commercial activities are allowed, they are permitted only to the extent that they provide for or enhance park visitor experiences. Commercial dog walking does not provide any park enhancement benefit. At a minimum, the SEIS must be revised to demonstrate how this commercial activity complies with applicable laws and regulations.

OB1400 - Ocean Beach: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53268) Commenters stated that areas for a no dog experience should be established in the following areas at Ocean Beach: the entire beach, ¾ of the beach, and the entire site (ban dogs in all areas).

Representative Quote(s):

Corr. ID: 1948 **Organization:** Not Specified **Comment ID:** 354596 **Organization Type:** Unaffiliated Individual

Representative Quote: I strongly support the proposed ban of all dogs from three-quarters of Ocean Beach year-round.

Corr. ID: 2000 **Organization:** *Not Specified* **Comment ID:** 518949 **Organization Type:** Unaffiliated Individual

Representative Quote: If the pets are allowed roaming in the Ocean Beach only, why they are running around the side walk along the beach ? They should be banned from the location.

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 405815 **Organization Type:** Unaffiliated Individual

Representative Quote: The DMP is also inadequate for protecting Snowy Plover habitat because it does not include the entire portion of Crissy Field and Ocean Beach. It draws imaginary boundaries that do not comport with typical visitor's understanding of GGNRA, and the plovers are not, to the best of my knowledge, able to discern where these boundaries are either. A typical visitor with a dog will not always know if he or she is entering an area where pets are restricted, especially if the regulatory signs are vandalized or torn down by individuals who disagree with the rules, as too frequently happens. This, again, will invite violations of pet regulations as people claim ignorance or confusion over the exact boundary. A closure prohibiting pets- -on- or off-leash- -should apply to all of Ocean Beach and Crissy Field.

Response: Dogs will be prohibited in the Snowy Plover Protection Area (SPPA) which is from Stairwell 21 to Sloat Boulevard, and from Stairwells 21 to 28 at Lincoln to provide a better buffer zone for this federally-threatened species.

CONCERN STATEMENT: (Concern ID: 53269) Commenters stated that areas for on-leash dog walking should be established in the following areas at Ocean Beach: the entire beach, on beach between Irving and Taraval St in the Snowy Plover Protection Area, on the beach from Cliff House to Lincoln St, and the entire Snowy Plover Protection Area.

Representative Quote(s):

Corr. ID: 178 **Organization:** *Not Specified* **Comment ID:** 405813 **Organization Type:** Unaffiliated Individual

Representative Quote: Please modify the play areas to allow at least on leash dogs at Baker Beach, all areas of Ocean Beach, and East Beach at Crissy Field.

Corr. ID: 199 **Organization:** *Not Specified* **Comment ID:** 350099 **Organization Type:** Unaffiliated Individual

Representative Quote: Please continue to allow LEASHED dogs on Ocean Beach between Irving and Taraval in the Snowy Plover Protected area.

We live here and walk our dog leashed.

Corr. ID: 224 **Organization:** *Not Specified* **Comment ID:** 350143 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm suggesting a modification to Map-E. The tourist heavy area from Cliff House to Lincoln should be leash required at all times. The area south of Lincoln should have seasonal off leash (Nov - May).

Corr. ID: 3143 **Organization:** *Not Specified* **Comment ID:** 357931 **Organization Type:** Unaffiliated Individual

Representative Quote: I suggest an alternative option to allow on-leash dog walking year-round in this section with off-leash access north of Stairwell 21.

My primary comment is that a year-round leash requirement in the SPPA with off-leash access north of Stairwell 21 would allow most of the uses of visitors and the community to compatibly occur, while protecting the snowy plover. Those that prefer an off-leash dog experience could walk, jog, or even drive (if needed) to the area north of Stairwell 21 to accommodate that need. Many people walk/jog the length of the beach to exercise themselves and their dogs - this is only possible if dogs are allowed south of Stairwell 21.

Response: Ocean Beach supports high diversity and abundance of shorebirds and serves as a regionally important site for shorebirds along the central California coast. The central and southern portions of Ocean Beach have a high abundance of shorebirds and the federally threatened western snowy plover, precluding establishment of VSCAs (voice and sight control areas - formerly referred to as regulated off leash areas, or ROLAs) there. Shorebirds use the entire beach all the way to the cliffs below the Cliff House; shorebirds are in lower abundance in the northern sector of the beach, and snowy plovers have only rarely been observed north of Lincoln Way. This southern area is highly important to migrating and wintering shorebirds and the NPS has documented incidents of dogs chasing plovers and other shorebirds there. NPS is aware that there are many factors impacting plovers, but this plan is directly addressing dog management. NPS has documented high levels of non-compliance with the existing Snowy Plover Protection Area by dog walkers under the no action alternative. Under the preferred alternative, a large portion of Ocean Beach would provide a no-dog experience. Please see chapter 2, Preferred Alternative for Ocean Beach for additional rationale.

CONCERN STATEMENT: (Concern ID: 53270) Commenters stated that ROLAs should be established in the following areas at Ocean Beach: beach south of Lincoln St. (seasonal), east end of Ocean Beach, all of Ocean Beach, north of Lincoln St., and both the north and south ends of the beach.

Representative Quote(s):

Corr. ID: 224 Organization: Not Specified Comment ID: 405811 Organization Type: Unaffiliated Individual

Representative Quote: I'm suggesting a modification to Map-E. The tourist heavy area from Cliff House to Lincoln should be leash required at all times. The area south of Lincoln should have seasonal off leash (Nov - May).

Corr. ID: 318 Organization: Not Specified Comment ID: 405812 Organization Type: Unaffiliated Individual

Representative Quote: I can see an effort at that at Ocean beach for instance, but Lands End needs a ROLA area, as does the East end of Ocean Beach. The middle beach section is too small, and not very accessible.

Corr. ID: 2335 Organization: Not Specified Comment ID: 357818 Organization Type: Unaffiliated Individual

Representative Quote: My comments are specific to the Ocean Beach proposal. Though I suspect my comment will be heard like a candle in a dog lobby tempest, I support Plan C or F or one of the all leash all the time proposals. At minimum, I would like to see a regulated zone at the north and extreme south ends of the beach where dog owners can let their dogs run amok as they are inclined to do.

Corr. ID: 2853 Organization: Not Specified Comment ID: 357644 Organization Type: Unaffiliated Individual

Representative Quote: It would make more sense to allow a smaller area like North of Lincoln to be off leash, and then allow leashed dogs for the rest of the beach.

Corr. ID: 4789 Organization: Not Specified Comment ID: 361535 Organization Type: Unaffiliated Individual

Representative Quote: I have been walking my dogs on Ocean Beach for nearly 20 years. It is vital for you to understand that everyone needs this beach to be off leash year round.

This beach has historically been off-leash, and your draconian efforts to thwart the canines is very short sighted. Please allow dogs to run free on the entirety of Ocean Beach - it is the right thing to do.

Response: Ocean Beach supports high diversity and abundance of shorebirds and serves as a regionally important site for shorebirds along the central California coast. The central and southern portions of Ocean Beach have a high abundance of shorebirds and the federally threatened western snowy plover, precluding establishment of VSCAs (voice and sight control areas - formerly referred to as regulated off leash areas, or ROLAs) there. Shorebirds use the entire beach all the way to the cliffs below the Cliff House; shorebirds are in lower abundance in the northern sector of the beach, and snowy plovers have only rarely been observed north of Lincoln Way. This southern area is highly important to migrating and wintering shorebirds and the NPS has documented incidents of dogs chasing plovers and other shorebirds there. NPS is aware that there are many factors impacting plovers, but this plan is directly addressing dog management. NPS has documented high levels of non-compliance with the existing Snowy Plover Protection Area by dog walkers under the no action alternative. Under the preferred alternative, a large portion of Ocean Beach would provide a no-dog experience. Please see chapter 2, Preferred Alternative for Ocean Beach for additional rationale.

CONCERN STATEMENT: (Concern ID: 53271) Commenters suggested moving the ROLA from the north section of Ocean Beach to the south section due to the popularity of the northern section of the beach.

Representative Quote(s):

Corr. ID: 444 Organization: Not Specified Comment ID: 351379 Organization Type: Unaffiliated Individual

Representative Quote: I am a resident of the outer Richmond and a regular jogger on Ocean Beach. I am disappointed to see you have proposed allowing off leash dogs on the northern end of the beach. I personally have stopped using this part of the beach because of off leash Pitt Bulls. It is also now more than ever difficult to jog ocean beach without stepping in dog poop. The off leash area should not be in the northern area which is more heavily used by city dwellers and tourist. Off leash should be limited to the southern end.

Response: Ocean Beach is primarily a shorebird beach and has been called out as such by Beach Watch. The central and southern portions of Ocean Beach have a high abundance of shorebirds. Shorebirds have been observed right up to Lincoln Way. This area is highly important to migrating shorebirds and the NPS has documented incidents of dogs chasing plovers and shorebirds. This is an area where the public goes and the NPS is aware that there are many factors impacting plovers; as this is a dog management plan, their impact is being addressed herein in the principal shorebird areas south of Lincoln Blvd.

VSCAs would not be established within other areas than between Stairwell 1-21 of Ocean Beach due to the narrowness of the beach which creates safety concerns and protection for the federally threatened western snowy plover and other shorebirds. Please see chapter 2, Preferred Alternative for Ocean Beach for additional rationale.

CONCERN STATEMENT: (Concern ID: 53272) Commenters suggested dividing Ocean Beach into two segments - a section for on and off-leash dog walking and a section for a no dog experience. Locations included no dog walking from stairwell 1 to 11 and dog walking from stairwell 12-22 (or vice versa) or dog walking between the zoo and Judah Ave with remaining areas no dog walking.

Representative Quote(s):

Corr. ID: 1187 **Organization:** Not Specified **Comment ID:** 351944 **Organization Type:** Unaffiliated Individual

Representative Quote: Divide Ocean Beach into two segments: stair well 1 to 11 no dogs; stair well 12-22 dogs permitted (or vice versa).

Corr. ID: 1268 **Organization:** Not Specified **Comment ID:** 352200 **Organization Type:** Unaffiliated Individual

Representative Quote: One solution would be to designate one half the beach for people only and the other half for people with dogs. It would be best to make the dog section that part of the ocean beach that runs between the zoo and Judah Avenue. Since people need to walk their dogs they should not mind having to park and walk quite a distance to get to the beach therefore allowing the people that need to park right near the beach to be able to have dog free Areas. Also there should be more doggy bag stations at all the stairway entrances to the And fines can be issued to pet owners who do not pick up their doggie waste.

Response: Ocean Beach supports high diversity and abundance of shorebirds and serves as a regionally important site for shorebirds along the central California coast. The central and southern portions of Ocean Beach have a high abundance of shorebirds and the federally threatened western snowy plover, precluding establishment of VSCAs (voice and sight control areas - formerly referred to as regulated off leash areas, or ROLAs) there. Shorebirds use the entire beach all the way to the cliffs below the Cliff House; shorebirds are in lower abundance in the northern sector of the beach, and snowy plovers have only rarely been observed north of Lincoln Way. This southern area is highly important to migrating and wintering shorebirds and the NPS has documented incidents of dogs chasing plovers and other shorebirds there. NPS is aware that there are many factors impacting plovers, but this plan is directly addressing dog management. NPS has documented high levels of non-compliance with the existing Snowy Plover Protection Area by dog walkers under the no action alternative. Under the preferred alternative, a large portion of Ocean Beach would provide a no-dog experience. Please see chapter 2, Preferred Alternative for Ocean Beach for additional rationale.

CONCERN STATEMENT: (Concern ID: 53273) Commenters suggested changing the name of the Snowy Plover Protection Area to Wildlife Protection Area to be more inclusive of other species using the habitat.

Representative Quote(s):

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 366112 **Organization Type:** Unaffiliated Individual

Representative Quote: Ocean Beach - GGAS supports the Preferred Alternative for Ocean Beach. To improve upon the Preferred Alternative, it is suggested that symbolic fencing and adequate signage is used to delineate the south border of the ROLA. A simple post and cable fence could be placed along the border from the sea wall to the plover sculpture. A well-defined border will help to reduce compliance problems and visitor conflict. Additionally, GGAS suggests changing the name Snowy Plover Protection Area to Wildlife Protection Area. A designation of Wildlife Protection Area would be inclusive of all wildlife species that use the beach habitat area.

Response: GGNRA staff discussed the appropriate names of these two areas; the current names are a result of special regulations for those two areas. Ultimately, GGNRA wants to ensure that all its natural resources are protected and reinforce the importance of that with the public, rather than just areas with such names, especially given that there are other sensitive areas with no current special names. Educational and interpretive signage is meant to further the understanding of higher level protected species which may occur inside and outside of such areas. Because the final plan/EIS will also be a special regulation, this is an opportunity to revisit special naming of sensitive areas to forge a consistent approach.

CONCERN STATEMENT: (Concern ID: 53274) Commenters stated that instead of banning dogs from the Snowy Plover Protection Area, additional education and signage or a seasonal restriction should be implemented.

Representative Quote(s):

Corr. ID: 2420 **Organization:** Not Specified **Comment ID:** 368495 **Organization Type:** Unaffiliated Individual

Representative Quote: Ocean Beach: Alternative A.

However, it's frustrating that I can't walk or run the length of the beach with my dog off leash. I understand there's a season snowy plover habitat/hatching issue, and I agree with limiting off-leash access during those times of the year. But I don't think there should be year-round closure of the area between Sloat and the Beach Chalet (where the snowy plover sign is located).

Corr. ID: 2853 **Organization:** *Not Specified* **Comment ID:** 357647 **Organization Type:** Unaffiliated Individual
Representative Quote: Instead of enforcing a complete ban, I feel that more education about the endangered/protected wildlife could be useful. Additional signs on the beach with information about why the area is leash only, etc. Additional installations of poop bag stations and trash cans would also help to keep the entire beach area clean. Also, the signage about the rules should direct people to different areas, so if they are in a leashed only area, they can easily find an off-leash area.

Response: Seasonal restrictions & signage have not been found to be effective enough in areas frequented by dog walkers. Compliance rates are low, for example, in the areas south of Lincoln Blvd on Ocean Beach for keeping dogs on-leash when law enforcement is not continually present and dog walkers are out of immediate sight.

CONCERN STATEMENT: (Concern ID: 53275) Commenters suggested placing a fence around the ROLA and increase signage to reduce compliance issues and visitor conflicts.

Representative Quote(s):

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 405814 **Organization Type:** Unaffiliated Individual

Representative Quote: Ocean Beach - GGAS supports the Preferred Alternative for Ocean Beach. To improve upon the Preferred Alternative, it is suggested that symbolic fencing and adequate signage is used to delineate the south border of the ROLA. A simple post and cable fence could be placed along the border from the sea wall to the plover sculpture. A well-defined border will help to reduce compliance problems and visitor conflict. Additionally, GGAS suggests changing the name Snowy Plover Protection Area to Wildlife Protection Area. A designation of Wildlife Protection Area would be inclusive of all wildlife species that use the beach habitat area.

Response: Fencing and natural vegetative barriers are discussed in chapter 2 of the final plan/EIS for the alternatives. Signage is also discussed in chapter 2. Both signage and fencing impacts have been discussed in chapter 4. Demarcation at Stairwell 21 along the beach will be implemented to better delineate those different areas visually along with signage at Stairwells.

OV1400 - Oakwood Valley: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53276) Commenters disagree with requiring dogs to be on leash in Oakwood Valley and would prefer to establish a ROLA. One commenter suggested that Oakwood Valley Trail remain available as an off leash trail, while other commenters prefer the entire site be under voice control.

Representative Quote(s):

Corr. ID: 42 **Organization:** *Not Specified* **Comment ID:** 338008 **Organization Type:** Unaffiliated Individual
Representative Quote: I am responding to the policy to close the Oakwood Valley Trail to dogs under voice control and to require them to be on-leash. I am a steward of Oakwood Valley and I have walked my dog on the trail for the 37 years I have lived in Tam Valley. Problems have been extremely rare with dogs under voice control. There is no habitat damage when owners keep their dogs on the trails. Fragile habitat areas, such as that of the mission blue butterfly, are not on the valley floor where the fire road and trail are. Where habitat restoration and fragile areas do exist, fence and signage should take care of the problem.

Corr. ID: 2433 **Organization:** *Not Specified* **Comment ID:** 405816 **Organization Type:** Unaffiliated Individual

Representative Quote: Oakwood Valley, Alta Trail Map 4-A Yes/In favor:

Comment: This is the best but still unreasonable. The entire area should be voice control since it is all one loop. Having areas where your dog has to be on leash in one spot and then on leash half way in creates artificial areas of conflict and harassment by park officials.

Response: The final plan/EIS considered but dismissed ROLAs on trails, except for a high use corridor at Ft. Funston, and a 1 mile section of fire road in Oakwood Valley (assuming installation of fencing and double gates), which was agreed upon by the Negotiated Rulemaking committee. This alternative element for Oakwood Valley was not adopted as part of the preferred alternative based on later public comment from dog walkers noting it was only worthwhile if more of Oakwood Valley could be maintained as off leash. In general, off leash on trails can create greater impacts to both natural resources and other visitors than dogs on leash. In Oakwood Valley in particular, the habitat is not seasonal; spotted owls occur there year-round. There

have also been issues near this site with dogs and coyotes in the past; keeping dogs on leash under the preferred alternative decreases impacts due to the physical restraint of dogs on leash.

CONCERN STATEMENT: (Concern ID: 53277) Commenters are opposed to closing a portion of Oakwood Valley Trail to dog walking as this trail to the fire road creates a desirable short-loop walk for dogs on leash.

Representative Quote(s):

Corr. ID: 325 **Organization:** *Not Specified* **Comment ID:** 350588 **Organization Type:** Unaffiliated Individual

Representative Quote: Oakwood Valley - Existing Trail and Fire Road make an excellent short loop on leash. What are the resource issues in closing the trail? It is generally well designed, in good condition

Response: Oakwood Valley is a distinct experience for a range of visitors, not just dog walkers; and, the NPS wants to provide a no dog experience in addition to a dog experience at this site. The narrowness of the Oakwood Meadow trail makes it less suitable for dog use - visitors having to step off of the trail to avoid dogs creates an issue for natural resources. NPS has observed wildlife in the trees and shrubs that are very close to the trail, and has documented dog / coyote encounters nearby. Even dogs on leash can displace wildlife, a concern in this narrow trail corridor. The more dense vegetation also provides much better quality of habitat than the former fire road, now called Oakwood Valley trail, on the other side of the creek. In addition, the Oakwood Meadow trail passes through the wet meadow, also valuable habitat that does not occur along the fire road.

CONCERN STATEMENT: (Concern ID: 53278) Several commenters are concerned about the effects of dogs on Mission Blue butterfly and its habitat at Oakwood Valley. One commenter suggested that dogs be allowed on the Fire Road while on leash only. While one commenter preferred to limit dogs to Alta only, another suggested fencing Mission Blue butterfly areas so that dogs would be allowed within Oakwood Valley.

Representative Quote(s):

Corr. ID: 606 **Organization:** *Not Specified* **Comment ID:** 352708 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe one of the options is to have part of Oak Valley off leash. This seems strange to me as there is so much wildlife in that valley. I understand that there is the endangered butterfly on Alta but not ALL of Alta. Is there a way to fence off the areas that are particularly vulnerable? Also is there proof that dogs on Alta are endangering the butterfly? That is such a large area - keep dogs just on Alta and not on the surrounding hills.

Corr. ID: 6323 **Organization:** Marin Audubon Society **Comment ID:** 365561 **Organization Type:** Unaffiliated Individual

Representative Quote: Oakwood Valley Trail

The preferred alternative for this site has been modified to allow on-leash dog walking on the fire road and on a portion of the Oakwood Valley Trail to the junction with Alta Trail. Dogs would no longer be allowed on social trails that meander through Mission Blue habitat. We support on-leash dogs on the fire road only. People without dogs also should be restricted from the social trails to protect Mission Blue Butterfly habitat. We strongly support not including a ROLA because of its impact on wildlife movement.

As with the Alta Trails above, for this Alternative to be effective frequent monitoring and effective enforcement will be required to ensure people do not go off designated trails.

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 366935 **Organization Type:** Unaffiliated Individual

Representative Quote: I am concerned that Alternative F would not adequately provide protection for contiguous habitat beyond the Oakwood trail and fire road junction and would increase the potential for dog/coyote interaction. Nor would Alternative F provide protection for potential habitat for species of concern, such as the mission blue butterfly habitat nearby and possible habitat for the northern spotted owl.

Corr. ID: 6507 **Organization:** *Not Specified* **Comment ID:** 367610 **Organization Type:** Unaffiliated Individual

Representative Quote: In talking with one of your Ecologist Rangers at a recent meeting on these issues at Tamalpais High School, we discussed that in above Oakwood Valley and along the Alta Trail, there has been identified some Mission Blue butterfly habitat that needs restoration work. I applaud that work and am sure that a way to do that without banning dogs from those trails is very possible. Perhaps the limited sections where that work is taking place could be fenced, or posted with "dogs on leash in this area" signage. Trails could be re-routed to avoid these areas.

Response: On-leash dog walking would be allowed along the Oakwood Valley Trail. On-leash dog walking would provide a dog walking experience without fencing to ensure the protection of the sensitive species, like the Mission Blue butterfly, and habitat located above this trail. It would also better protect native plant species and the stream corridor from roaming dogs

off-leash. Fencing is a developed protection that intrudes in the natural landscape and should be used sparingly in national parks rather than as a primary tool to protect habitat from adverse use impacts. It may be used more often in developed landscapes, such as in former military areas, beaches and county or city parks rather than national park natural areas where it detracts from the natural landscape. An exception is on well-traveled trails where safety is primary concern, and even then it is to be used sparingly to remind visitors of the risk of being too close to edges or of newly-planted and restored areas.

PN7000 - Purpose and Need: Adequacy of EIS Purpose and Need

CONCERN STATEMENT: (Concern ID: 53389) Many commenters expressed concern that the NPS does not provide solid evidence for the need of the dog management plan. Commenters do not agree that just because GGNRA is a park of the national parks system it should follow the same management rules as other units.

Representative Quote(s):

Corr. ID: 5227 Organization: Not Specified Comment ID: 362705 Organization Type: Unaffiliated Individual

Representative Quote: The NPS does not demonstrate a need for action. In the Plans pre-amble, the Plan argues for action because the parks resources and values, as defined by the parks enabling legislation, could be compromised without action. NPS does not make a compelling case that the existing 1979 Pet Policy is at odds with the recreational mandate of the GGNRA.

Corr. ID: 5336 Organization: Not Specified Comment ID: 362978 Organization Type: Unaffiliated Individual

Representative Quote: Finally, we do not believe that the fact that the GGNRA is part of the National Parks System - with its own history of leash-laws and rules - is a sufficient reason for changing those in the GGNRA. In general, the NPS was created in order to both maintain existing natural beauty and eco-systems, and allow the public to experience them pristinely.

Corr. ID: 6595 Organization: Not Specified Comment ID: 369588 Organization Type: Unaffiliated Individual

Representative Quote: The basis for the SEIS - the Purpose and Need for Action - needs to be completely revised to address two fundamental inadequacies"

i. The first part of the need statement asserts the resources/values could be impacted ("A draft plan/SEIS is needed because GGNRA resources and values, as defined by the park's enabling legislation with 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.") The document continues to describe possible impacts, biological and health-safety, that are not backed by credible studies, observations, or science in the GGNRA. The issues raised are conjecture rather than real issues based on solid data.

ii. The second part of the need statement implies that all NPS areas need to be regulated in a consistent manner ("Additionally, a dog management policy inconsistent with NPS regulations and increased public expectations for use of the park for dog recreation has resulted in controversy, litigation, and compromised visitor experience and resulting in resource degradation. The conflicts will likely escalate if not addressed in a comprehensive draft plan/SEIS." Parks have different values and resources and should be managed accordingly. Adaptive management is very much an accepted principle, and the Park Service should consider this in the management of its different resources. Recreation has long been an important value of the urban GGNRA. The "need" statement implies the NPS doesn't want the headache of inconsistent management - this is a woeful and un-compelling reason to remove dog access that so many people and dogs have come to depend on and enjoy for their quality of life. Sometimes our jobs are difficult, but worthwhile to uphold the values we set out for ourselves.

Response: The need for the dog management plan is described in chapter 1 under the "Purpose and Need for Action" section. The current situation and issues with current dog walking status in GGNRA are also outlined in the "Current Dog Management Issues and Impact Topics" section of chapter 1. NPS Management Policies, which apply to all units of the NPS, provide that the fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. This mandate is independent of the separate prohibition on impairment and applies all the time with respect to all park resources and values, even when there is no risk that any park resources or values may be impaired. NPS managers must always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values. Congress has directed that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant. (NPS Management Policies § 1.4.3, 54 USC 100101(a), 100301 et seq.). GGNRA's enabling legislation reflects this dual mission - to "preserve public use and enjoyment" and "provide for the maintenance of needed recreational open space" while at the same time managing it "consistent with sound principles of land use planning" and "preserv[ing] the recreation area, as far as possible, in its natural setting...".

PN8000 - Purpose And Need: Objectives In Taking Action

CONCERN STATEMENT: (Concern ID: 53391) Commenters feel that several of the objectives will not be met by the management plan, such as consistent visitor experience throughout the park, minimizing conflicts involving dogs, and achieving a sufficient level of management. Some commenters questioned the objectives, specifically those on protecting cultural resources, maximizing education, and putting greatest emphasis on resources as opposed to human use.

Representative Quote(s):

Corr. ID: 5017 Organization: Not Specified Comment ID: 362011 Organization Type: Unaffiliated Individual

Representative Quote: Page 43 of the SEIS refers to "Management objectives in the draft 2011 General Management Plan that are relevant to dog management include the following: The park has significantly expanded in size and includes many new lands in San Mateo County. This planning process takes a comprehensive parkwide approach that will help ensure that the management of the natural and cultural resources and visitor experiences are consistent throughout all park areas." The SEIS does not meet this objective because Marin County and San Francisco County both have off-leash dog walking areas, while GGNRA's preferred alternatives for San Mateo County have none. Off-leash dog walking areas should be provided by GGNRA in San Mateo County as well as the other two counties.

Corr. ID: 6124 Organization: Not Specified Comment ID: 365509 Organization Type: Unaffiliated Individual

Representative Quote: The report cites as an objective "Protect cultural resources from the detrimental effects of dog use." I have read this entire report carefully, and found no reference to any "cultural resources" of any substantial value that are being degraded by dog use. This objective is not altered under any of the proposed plans, and is of no use in justifying any of the plans.

Corr. ID: 6124 Organization: Not Specified Comment ID: 365511 Organization Type: Unaffiliated Individual

Representative Quote: Under "Education", the report has an objective of "Build community support for the plan to maximize management of dog walking use." Exactly - The goal is to "maximize management". Who decided that the Goal of the NPS should be to MAXIMIZE MANAGEMENT of anything?

Corr. ID: 6124 Organization: Not Specified Comment ID: 365500 Organization Type: Unaffiliated Individual

Representative Quote: There is an inherent conflict between "minimizing conflicts" and "including areas where dogs are allowed", and the report says nothing about how these conflicting goals are weighted or balanced. At present, the number of conflicts is exceedingly low (only 95 reports in 4 years, compared against 4.5 million incidents nationwide), and the present arrangement provides for a tremendous quantity of high-value experiences, as any visitor to the GGNRA can plainly see. The proposed plans will dramatically curtail experiences related to dog walking while providing no obvious reduction in the number of dog-attacks. Therefore, I do not believe that this objective is met by any of the new proposals, and is in fact, worsened by each of them.

Corr. ID: 6140 Organization: Not Specified Comment ID: 365599 Organization Type: Unaffiliated Individual

Representative Quote: I disagree that the goal of the NPS should be to absolutely minimize impacts without concern for public use. In the case of the GGNRA which is a public park situated in the middle of a dense urban population, the value of public use is MUCH HIGHER than in a remote park. The NPS wants to use exactly the same analysis on Crissy Field as it would use on a beach in the Alaska National Wildlife Refuge. However, it should be obvious that the potential benefits associated with public use at Crissy Field are immensely different than they would be on a remote beach in a wilderness. Therefore, a different analysis, based on the obviously different value opportunity, should be used.

Corr. ID: 6678 Organization: Wild Equity Institute Comment ID: 369609 Organization Type: Non-Governmental

Representative Quote: The Park Service has presented several objectives, including providing a clear, enforceable dog management policy; preserving and protecting natural and cultural resources and natural processes; improving visitor safety; and reducing user conflicts.(1) However, the SEIS still does not achieve the level of management necessary for the Park Service to meet its stated objectives.

Response: The objectives of the dog management plan/EIS are based on the Guiding Principles developed under consensus agreement by the Negotiated Rulemaking Committee, which itself was constituted by a diverse range of stakeholder groups interested in dog management. The draft plan/SEIS includes a reasonable range of alternatives allowing a diverse range of visitor experiences while still protecting resources at the park. NPS has found that the preferred alternative best meets these

objectives.

CONCERN STATEMENT: (Concern ID: 56083) Objectives concerning water quality should be removed since there is no evidence that dogs impact this resource.

Representative Quote(s):

Corr. ID: 6717 **Organization:** K&L Gates LLP **Comment ID:** 499843 **Organization Type:** Unaffiliated Individual
Representative Quote: The purpose and need statement also continues to reflect the NPS' s unsupported determination that the mere presence of dogs has negative water quality impacts. Due to a lack of reliable information, the NPS eliminated its analysis of water quality impacts (9). These considerations therefore should not form the basis of NPS's decision with respect to dog management in the GGNRA . Nevertheless, the "Objectives" continue to describe the purpose of the Plan as "[m]inimiz[ing] degradation of vegetation, soil and water resources by dog use." DSEIS at 2. The NPS should revise the purpose and need statement and all relevant alternatives accordingly.

Response: Although no site-specific, peer- reviewed studies have been conducted at the GGNRA sites to document impacts to water quality specifically from dogs, minimizing degradation to water quality from dog use and dog waste is still an objective of the dog management plan. Compliance with regulations to pick up dog waste and organized pet waste clean-up days would minimize the threat to water quality, specifically for example, in the VSCA near Crissy Marsh. Additional information on water quality can be found in chapter 2, Issues and Impact Topics Eliminated From Further Consideration in the draft plan/SEIS.

PO1100 - Comments Regarding Enforcement of Dog Walkers

CONCERN STATEMENT: (Concern ID: 53392) Commenters expressed doubt or concern about the ability of the NPS to enforce the proposed restrictions as not enough detail on the enforcement of the proposed regulations were included in the draft plan/SEIS. Commenters expressed strongly that the new regulations would only be successful with strong enforcement. The areas that should be allowed for off-leash dog walking should reflect the actual ability of the NPS to enforce regulations. Many commenters noted that the enforcement of current regulations was inconsistent or not present. Current regulations regarding dogs should be enforced rather than new restrictions. Many commenters noted that a majority of dog owners are compliant, and enforcing the rules for the non-compliant dog walkers would be successful.

Representative Quote(s):

Corr. ID: 219 **Organization:** Not Specified **Comment ID:** 350133 **Organization Type:** Unaffiliated Individual
Representative Quote: Simply stating a trail is leash only does not make it so. It must be enforced. The NPS does not have the enforcement capacity now to enforce that rule. And the future strongly suggests that NPS capacity will be cut rather than enhanced. As a consequence, stating a leash only rule has the effect of allowing unleashed dogs on trails in many instances.

Corr. ID: 648 **Organization:** Not Specified **Comment ID:** 352816 **Organization Type:** Unaffiliated Individual
Representative Quote: I am in support of the NPS preferred alternative for Ocean Beach, but I would like to stress the importance of enforcing the law. Without enforcement there is no law, and that is the current state of Ocean Beach. I have walked the full length of Ocean Beach 72 times over the past year. I observed egregious amounts of non-compliance with the current laws, and I have never once seen a Park Ranger doing anything about it. Any changes in the law will be purely symbolic unless they are actually enforced. Whether the current laws stay in place, or the preferred alternative is initiated, I urge the NPS to actually enforce the laws to protect natural resources and visitor experience.

Corr. ID: 1400 **Organization:** Not Specified **Comment ID:** 352445 **Organization Type:** Unaffiliated Individual
Representative Quote: And in my 13 years of frequenting Mori Point, I have yet to see one enforcement officer, hence the low number of reported incidents in the most recent report. If there are not enough resources to enforce on-leash and excrement pick-up policies, the proposed alternative of on-leash is useless. We are back to the status quo of lack of safety, damaged ecology for the animals that do belong in the area, as well as the unhygienic waste ubiquitous to Mori Point.

Corr. ID: 2246 **Organization:** Not Specified **Comment ID:** 356874 **Organization Type:** Unaffiliated Individual
Representative Quote: The newly restrictive dog management plan makes no sense. If the problem is that people have not been adhering to the existing plan, the solution is to enforce the existing plan, not to make it even more restrictive. This only punishes the people who HAVE been following the plan, and those who flout them will simply continue doing so.

Corr. ID: 2363 **Organization:** *Not Specified* **Comment ID:** 358390 **Organization Type:** Unaffiliated Individual
Representative Quote: The obvious solution to the problem, which annoys the majority of dog owners as well, is enforcement of the current rules.

And let's not be naive about the power of rule-making to stop the improper conduct of this small majority- -they will simply break these new rules and run their dogs off leash regardless. The only way to stop them: enforcement. So seeing as how enforcement is the only way to stop the inconsiderate conduct that we all deplore, let's not punish the majority of dog owners who respect the rights of everyone to enjoy our natural environment.

Corr. ID: 3834 **Organization:** *Not Specified* **Comment ID:** 405838 **Organization Type:** Unaffiliated Individual
Representative Quote: Enforcement Policy

The policies must be vigorously enforced; otherwise this initiative is doomed to fail. Must make it clear how enforced. The only way to effectively enforce issued citations is to have the rules state that by using the park, dog owners accept the rules and responsibilities, and enforcement procedures. Appropriate staff must be provided and tasked to enforce these rules at all times. Either existing staff or new dedicated staff needs to be hired to patrol and enforce these areas. Enforcement fines should be easily enough to cover the associated personnel expenses.

Corr. ID: 3938 **Organization:** *Not Specified* **Comment ID:** 360095 **Organization Type:** Unaffiliated Individual
Representative Quote: Both will require a new level of management by NPS which even now does not really exist with regard to trails or access paths to the beach. There is essentially no enforcement now of the leash rules. Vehicle-based enforcement will not be adequate for any of the alternatives

Corr. ID: 4722 **Organization:** *Not Specified* **Comment ID:** 361389 **Organization Type:** Unaffiliated Individual
Representative Quote: Most importantly, whatever mix of restrictions are implemented, I urge you to vigorously enforce the new regulations by issuing citations from Day 1. Many dog owners are proud scofflaws. Enforcement is the only way for the new regulations to be successful. Please install clear signage at trailheads and beach access that clearly states "Dogs on-leash only. Citations issued. No warnings given." Robust enforcement, issuing citations, not warnings, is the only way that the new regulations will be followed. Please issue citations to violators.

Corr. ID: 4932 **Organization:** *Not Specified* **Comment ID:** 361793 **Organization Type:** Unaffiliated Individual
Representative Quote: Having witnessed countless violations of posted NPS policies and flagrant disregard for the park environment by dog owners, it is most imperative that the NPS not only implement a strong Dog Management Plan, but also ensure appropriate resources for its monitoring and enforcement.

Corr. ID: 6323 **Organization:** Marin Audubon Society **Comment ID:** 365547 **Organization Type:** Unaffiliated Individual

Representative Quote: Enforcement not Adequately Addressed

Enforcement is key to successful implementation, to compliance and to protection of wildlife and habitats. Too many people seem to feel that they will never get caught, don't care, or feel that they are somehow different and entitled to behave as they wish. The description of the enforcement program or management activities is vague and leaves many components poorly defined.

There should be a more comprehensive description of the planned enforcement program. What are the anticipated threshold levels for implementing management actions and would they differ among sites? What thresholds or triggers would be used to decide when to take enforcement actions management actions such as to close a trail? What specific enforcement actions would be initiated, besides issuing warrants to violators and or closing trails, and for what non-compliance activities would they be initiated?

GGNRA is in the process of developing a warrant process. Information should be provided about the warrants: how they would be issued; for what infractions; how many times would offenses have to be repeated before warrants would be issued?

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 366294 **Organization Type:** Unaffiliated Individual
Representative Quote: Leash requirements must be strictly enforced throughout the life of the policy. Otherwise

proposed on-leash areas will become de facto off-leash areas, as has already happened under the old rules. Any DMP or EIS Alternative must also include funding for thorough enforcement. As it is, dog owners recognize that there is little chance that they will encounter a law enforcement ranger, so they readily let their dogs off-leash and/or take their dogs into closed areas without fear of negative repercussions.

Response: Chapter 3, Park Operations was revised to include examples of public comments on law enforcement and park operations, and a discussion of law enforcement incidents in GGNRA. Additional staff are being hired to implement the dog management plan to increase law enforcement presence throughout the park and conduct outreach and education efforts. An intensive outreach and education effort will be instituted as part of the implementation effort which would provide additional communication options and a monitoring program begun to document compliance with regulations and resource impacts. The results of the monitoring would also increase park awareness of situations requiring more targeted law enforcement responses. GGNRA is reinforcing a community policing and cooperative effort in all its enforcement and outreach training and work in the field.

CONCERN STATEMENT: (Concern ID: 53393) Commenters made suggestions about enforcement of the new regulations. Some suggestions include not using mounted police in off-leash dog areas, more ranger training and education, using random checks to issue citations, a violation reporting system for the public to report offenders, relaxed enforcement of rules with tickets as a last resort, and a system to report rangers who acted inappropriately towards dog owners.

Representative Quote(s):

Corr. ID: 26 Organization: *Not Specified* **Comment ID:** 405834 **Organization Type:** Unaffiliated Individual
Representative Quote: In referenced to unleashed areas in federal parks- Any area that allows dogs to be unleashed should not be patrolled by mounted park police officers. It is an accident waiting to happen to allow horses in parks designated for unleashed dogs AND dogs to be under voice control. For everyone's safety, including dogs, people, mounted officers & horses, KEEP horses OUT of the parks where you allow off-leashed dogs.

Corr. ID: 80 Organization: Libertarian Party of San Francisco **Comment ID:** 405835 **Organization Type:** Unaffiliated Individual

Representative Quote: GGNRA rules should also provide penalties for overzealous enforcement by park rangers or other government employees who may be tempted to engage in petty power trips when dealing with members of the public. These penalties should be *heavier* than any imposed on dog owners for violations of the rules, since government employees are entrusted by the public with special authorities and responsibilities and therefore must be held to higher standards.

When someone files a complaint regarding a particular employee, there should be an investigation into the behavior described in the complaint, and the person who filed the complaint should be informed as to how that investigation was conducted, what penalties were imposed or corrective actions taken if any, and how to further appeal the issue if desired.

Too many individuals in positions of authority think that wearing a uniform or having a shiny badge gives them carte blanche to order people around, take on an arrogant attitude, or refuse to answer legitimate questions. Public servants should act like public *servants*, and if they are unable to do their jobs with an appropriately humble and service-oriented attitude, then they should be sent to remedial sensitivity training or removed from their positions.

Complaint procedures should also be clear, simple, and transparent to media and members of the public. Complaint forms should be available on-site, and should also be public. No one should have to rely on simply taking the word of a government employee when asking questions such as what opinions have been voiced by members of the public with regard to a specific policy <redacted> they should be given free access to view, copy, listen to, etc., the original documents, emails, voicemail messages, etc.

Corr. ID: 1179 Organization: *Not Specified* **Comment ID:** 351920 **Organization Type:** Unaffiliated Individual
Representative Quote: We would hope that you would instruct officers to talk to offenders and only issue tickets as a last resort to repeat offenders. Signage needs to indicate an enforceable standard for "voice control" such as 30 or 60 seconds. If the NPS wants the off-leash area to be successful for us dog owners I would hope that tickets would only be issued on very rare occasions and the rules be loosely enforced, especially at the Central Beach and early mornings or late afternoons at the East Beach.

Corr. ID: 1493 **Organization:** *Not Specified* **Comment ID:** 352909 **Organization Type:** Unaffiliated Individual
Representative Quote: Just like the CHP puts out sobriety checkpoints, I would love to see rangers do regular, unannounced citations of off leash dog walkers. Let the word get around that one will get cited for breaking the rules

Corr. ID: 1916 **Organization:** *Not Specified* **Comment ID:** 354542 **Organization Type:** Unaffiliated Individual
Representative Quote: How about signs at the trails with a number to call and report bad behavior? How about rangers doing spot checks for bad behavior? Rather than poop on the hundreds of responsible park users and their dogs, how about rangers and deputies investigate and respond to calls and reports on a case by case basis of bad behavior rather than spend their time scouting for random violations of leash law that weren't reported by a complainant?

Corr. ID: 2401 **Organization:** *Not Specified* **Comment ID:** 358897 **Organization Type:** Unaffiliated Individual
Representative Quote: However and more important, stronger compliance should be a high priority when it comes to off-leash areas for dogs that are not under voice command. Pets that run free, that do not respond to owners voice commands should cited and multiple violation should come with an eventual banishment from open space in GGNRA.

Corr. ID: 5151 **Organization:** International Urban Estuary Network/Save the Bay **Comment ID:** 362282
Organization Type: Unaffiliated Individual
Representative Quote: A simple and effective violation reporting system should be established.
 The dog management plan should include a method by which park visitors can easily and effectively report non-compliant behavior. Perhaps a smart phone app that directly connects to the Park Police or to a reporting system could be devised. At a minimum signs could be posted at entrance points, (ie., Ocean Beach) with a phone number to call and report forms/information.

Response: Chapter 4 discusses implementation of the draft plan/SEIS and the initial education and enforcement period. During this period, park outreach and LE staff would increase contact with park visitors walking dogs in all areas in this draft plan/SEIS. The new regulations would be explained, and after the initial education period, and signing, warnings or citations would be issued by the LE staff. Regarding horses used for patrol purposes, the park does use horse patrol, and has since the early years of the park. It is an effective method of patrol and will continue to be utilized. Additionally, the dog walking group at Fort Funston worked with the local equestrian organization and the park to develop FAQs on how to manage their dogs around horses to ensure safety of all involved. The resulting information is now posted on the Fort Funston Dog web site. Regarding a violations reporting system, the park's dispatch is the central hub for communicating both an incident and assigning patrol enforcement officers to the area. Part of the problem in the past has been that violators leave the site before an officer can get there; while the park will increase its enforcement staff, a witness to an altercation or other citable offense can relay relevant information to law enforcement, including where a license or permit number. Any dog walker whose dog is involved in a biting or attack is required to remain at the site and provide identifying information when asked for it or face risk of citation. Likewise, if any ranger is involved in seemingly inappropriate behavior, such behavior should be reported immediately to the park Superintendent's office.

CONCERN STATEMENT: (Concern ID: 53394) Commenters felt that the dog walking community is successful at enforcing the current regulations. The use of more signage or education about the existing regulations and working with the dog walking community to educate about unwanted behavior would further help this community self-regulate.

Representative Quote(s):

Corr. ID: 489 **Organization:** *Not Specified* **Comment ID:** 351785 **Organization Type:** Unaffiliated Individual
Representative Quote: Better posting of existing regulations is all that's needed to educate visitors with dogs and overwhelmingly responsible vast majority of dog owners will happily assist in politely enforcing the rules.

Corr. ID: 568 **Organization:** *Not Specified* **Comment ID:** 352651 **Organization Type:** Unaffiliated Individual
Representative Quote: If there are concerns about enforcement of existing policies, then a reasonable first step is to make sure those policies are clearly communicated. I have been very confused about which areas of Ft. Funston are considered "off path" for humans (who are heavier and more disruptive to their environment than any almost any other animal). If there are concerns about protecting the park, then enforcement of existing restrictions is a reasonable first step. Instead of spending money on a plan, the GGNRA could be making money by fining violators to existing restrictions.

Corr. ID: 1807 **Organization:** *Not Specified* **Comment ID:** 354121 **Organization Type:** Unaffiliated Individual

Representative Quote: Rules are needed, not exclusions, and the dog-owner community is exceptional in its enforcement of responsible behavior among itself.

Corr. ID: 5312 **Organization:** *Not Specified* **Comment ID:** 405839 **Organization Type:** Unaffiliated Individual
Representative Quote: In all that time and on all those occasions there have been very few encounters (I can count them on the fingers of one hand) with other park users who have problems with off leash dogs. Instead all the different types of folks I've encountered on the trail seem to have learned to get along with one another, especially after it became evident that, due to funding cuts everywhere, there's no authority figure they can run to with their problems

Corr. ID: 5822 **Organization:** *Not Specified* **Comment ID:** 367540 **Organization Type:** Unaffiliated Individual
Representative Quote: It would be helpful if the GGNRA would place signs about where people can walk their dogs under the 1979 Pet Policy now so everyone can understand the boundaries. This would also give the US Park Police and NPS Park Rangers an idea about where to enforce or not on GGNRA lands. These immediate possible mitigation measures should be given a chance to work before the GGNRA implements any significant restrictions as are proposed in the DSEIS.

Corr. ID: 6040 **Organization:** *Not Specified* **Comment ID:** 365019 **Organization Type:** Unaffiliated Individual
Representative Quote: In my time as a Dog Walker I've NEVER had a problem with another dog or their walker, in fact just the opposite - I feel overall we police the area ourselves very well & in no way do I feel \$2,000,000 should be used in support of more rangers. There are certainly many other areas that would benefit from those funds like MORE parking!

Response: New signage, education and outreach are important elements of the implementation plan. The park will encourage community groups, as part of its implementation efforts and outreach, to assist in this transition to new norms and the final plan/EIS. Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

CONCERN STATEMENT: (Concern ID: 53395) Some commenters expressed that they would continue to be non-compliant to any new regulations and stated that they would resist and attempt at enforcement of the regulations despite the consequences.

Representative Quote(s):

Corr. ID: 7 **Organization:** *Not Specified* **Comment ID:** 337960 **Organization Type:** Unaffiliated Individual
Representative Quote: Currently there is a leash requirement, yet there are off leash dogs running free in that area all of the time. If your team isn't able to enforce the leash laws, how do you expect to enforce the ban - especially with hundreds of angry protesters showing up with their dogs just to show you we won't let you take our beach from us.

Corr. ID: 1459 **Organization:** *Not Specified* **Comment ID:** 352817 **Organization Type:** Unaffiliated Individual
Representative Quote: Just because you walk a dog off lease doesn't mean you're subject to stop & seizure... what that means is I HAVE EVERY RIGHT TO WITHHOLD NAME & ADDRESS if I get confronted by a ranger... so how do you plan to enforce it?

Corr. ID: 5198 **Organization:** *Not Specified* **Comment ID:** 362575 **Organization Type:** Unaffiliated Individual
Representative Quote: You know what if you continue these leash laws/ no dogs allowed, perhaps we could still go to those no dogs allowed and let are dogs go off leash going against the leash laws. If rangers come we will refuse to obey just like Rosa Parks did on that buss in 1958.

Corr. ID: 5205 **Organization:** *Not Specified* **Comment ID:** 362599 **Organization Type:** Unaffiliated Individual
Representative Quote: If you pass this we will continue to walk our dogs. The rangers who will be ticketing will be foreigners on our land. College grads from Michigan etc.
This is not right. You will have to ticket, taze, arrest on repeat because we will continue our life style.

Corr. ID: 5224 **Organization:** *Not Specified* **Comment ID:** 362693 **Organization Type:** Unaffiliated Individual
Representative Quote: Packing off-leash recreation into small spaces will create unpleasant, crowded "dog runs." Many people, me included, will simply stop going to legal off-leash areas. Will people simply stop walking their dog off-leash? Some may, but many others will probably crowd into city parks. And some will simply walk in areas of the

GGNRA where they are not likely to encounter a ranger/citation.

Corr. ID: 6536 **Organization:** *Not Specified* **Comment ID:** 368844 **Organization Type:** Unaffiliated Individual

Representative Quote: The policy changes will be very difficult to enforce. Some civil disobedience is likely.

Response: During the initial phase of implementation of the dog management plan, there will be an intense outreach and education phase which would involve additional park staff as well as enforcement personnel throughout the park. This increase in staffing during the initial phase, with its emphasis on education, is intended to increase compliance by increasing understanding of the purpose and reducing misunderstanding about the new regulation. This is intended to help reduce both the number of violators and negative interactions. A monitoring program that is implemented will also gauge compliance and provide input to the Superintendent on further actions that may be necessary.

CONCERN STATEMENT: (Concern ID: 53396) Commenters noted that enforcement of the proposed regulation would be costly and impossible due to current funding. Instead, funding to implement the proposal would be better spent on enforcing the existing policy and on new educational and dog-friendly programs.

Representative Quote(s):

Corr. ID: 1208 **Organization:** Citizens for Progress and Sanity **Comment ID:** 351983 **Organization Type:** Unaffiliated Individual

Representative Quote: Lastly, I would like to address the economic sense of further restricting parks from dog friendly space. Any tightening of dog restrictions would naturally require additional resources for policing and enforcing said policies. With our park systems already under intense financial pressures (park closers, etc), could our park dollars not be better spent reopening and maintaining our parks system instead of degrading the experience of some the parks systems biggest advocates and supporters?

Corr. ID: 1919 **Organization:** *Not Specified* **Comment ID:** 354554 **Organization Type:** Unaffiliated Individual

Representative Quote: The notion that increasing regulations won't lead to increased enforcement costs is obviously flawed. Restrictions are meaningless if not enforced and that takes ranger hours and money. I imagine it would take a lot of money to keep a resident of muir beach from taking their dog onto the beach or the coastal trail.

Corr. ID: 2943 **Organization:** DogPAC of San Francisco **Comment ID:** 355250 **Organization Type:** Unaffiliated Individual

Representative Quote: Not to mention enforcing will be impossible given current funding.

Corr. ID: 6079 **Organization:** *Not Specified* **Comment ID:** 365368 **Organization Type:** Unaffiliated Individual

Representative Quote: The request for \$2,000,000 for more rangers to implement the dog management plan would be much better spent on simply enforcing the existing 1979 Pet Policy and on new educational and dog-friendly park programs, as well as supporting the existing infrastructure used by all park visitors.

Corr. ID: 6155 **Organization:** *Not Specified* **Comment ID:** 365652 **Organization Type:** Unaffiliated Individual

Representative Quote: Enforcement of the existing policy will be far more economical (instead of the \$2 million dollars requested to implement the proposed Dog Management Plan) as well as solving any problems currently perceived or existing.

Response: Chapter 4, Park Operations discusses implementation of the final plan/EIS and the initial education and enforcement period. The proposed rule will require a transition increase in funding to first inform visitors about the new rule and create the awareness of changes in use in the 21 park areas; and, then the monitoring management program will provide ongoing input into park management regarding compliance. The Superintendent will have the authority to initiate primary and secondary management actions to improve compliance. Finally, increased patrols will assist in outreach and enforcement efforts to reinforce these new norms for dog walking in the park. The existing practice, despite enforcement efforts, does not meet the objectives as noted in the draft plan/SEIS.

PO2010 - Park Operations: Affected Environment

CONCERN STATEMENT: (Concern ID: 53399) Many commenters noted that the ranger/enforcement presence in the park was very low. A few commenters felt that rangers were sometimes threatening or rude, and felt that the attitude of some rangers was not good, while others felt that rangers were constantly working to try to enforce compliance, and that dog owners sometimes threatened rangers.

Representative Quote(s):

Corr. ID: 45 **Organization:** *Not Specified* **Comment ID:** 344093 **Organization Type:** Unaffiliated Individual

Representative Quote: I have never seen any rangers or enforcement ever present in all the years I've lived here and enjoyed the beach. Rangers ignore the stretch near Daly City south of Funston. I love dogs but the place is overrun now, and it shows.

Corr. ID: 1059 **Organization:** Dog owner. (Murphy) **Comment ID:** 351499 **Organization Type:** Unaffiliated Individual

Representative Quote: While some service members have been courteous often personnel have been rude and surly if not physically threatening when I was exercising my dog. Quite frankly as a well-mannered older woman I posed no threat and their bullying behavior and attitude toward a city resident was not necessary.

Corr. ID: 3280 **Organization:** *Not Specified* **Comment ID:** 358040 **Organization Type:** Unaffiliated Individual

Representative Quote: I am sure that the National Park Service is tired of having to discipline dog owners, I see them writing tickets here all the time to owners who have their dogs off-leash the next day again in leashed area, educated individuals that cannot understand why their dog must be on-leash and I am certain the Park Service is concerned about the welfare of fragile hillsides and indigenous flora and fauna that is being destroyed by off-leash dogs.

Corr. ID: 5403 **Organization:** *Not Specified* **Comment ID:** 363176 **Organization Type:** Unaffiliated Individual

Representative Quote: Non-compliant, aggressive and/or abusive dog owners interfere and endanger Federal Officers and Rangers

Corr. ID: 5971 **Organization:** *Not Specified* **Comment ID:** 364840 **Organization Type:** Unaffiliated Individual

Representative Quote: Equally important is educated, aware, responsible, reasonable and cooperative enforcement personnel. The NPS has some distance to travel before attaining this status. NPS' goal must not be perceived as the eradication of dogs and their owners.

Response: Chapter 3, Park Operations was revised in the draft plan/SEIS to include examples of public comments on law enforcement and park operations, and a discussion of law enforcement incidents in GGNRA has been updated in the final plan/EIS. Additional staff are being hired to implement the dog management plan to increase law enforcement presence throughout the park and conduct outreach and education efforts. An intensive outreach and education effort will be implemented which would provide additional communication options as well as a monitoring management program to document compliance with regulations and resource impacts. The results of the monitoring would also increase park awareness of situations requiring more targeted law enforcement responses. GGNRA is reinforcing a community policing and cooperative effort in all its enforcement and outreach training and work in the field. This training will continue and be a key component in developing a cooperation.

CONCERN STATEMENT: (Concern ID: 53400) Commenters noted that many areas of the GGNRA were not well maintained by park staff, including restrooms, trash collection, sand on paths and walkways, and signage. Some commenters felt that noted behaviors, such as driving along fire roads, appeared to be more detrimental to the environment and special status species than walking dogs on-leash.

Representative Quote(s):

Corr. ID: 1275 **Organization:** Ocean Beach Dog Walkers at Fort Funston **Comment ID:** 352215 **Organization Type:** Unaffiliated Individual

Representative Quote: The GGNRA is an absentee custodian of the GGNRA parks in San Francisco. There are insufficient restrooms, garbage cans and the roads and paths are poorly maintained. While it was two members of Ocean Beach Dog Walkers just the other day witnessed a man defecating on the Stairs of Ocean Beach just south of the Cliff House. There are no Public Restrooms in the area and refuse cans are in short supply.

Corr. ID: 1785 **Organization:** Muir Beach Community Services District **Comment ID:** 353851 **Organization Type:** Unaffiliated Individual

Representative Quote: In all my years of hiking on these trails I can't recall ever seeing any Park Service people out on foot on the trails either south of Muir Beach or North on the Owl Trail or the old Banducci Farm Rd. I've only seen them in NPS vehicles driving on the fire roads and creating large ruts when muddy. Certainly that is far more destructive of the environment than a few isolated people with dogs on-leash. If you folks hardly ever walk these trails I don't see how you can justify prohibiting people like me from hiking with my dogs on-leash. You can't possibly know what the conditions are or even if they affect the environment at all.

Corr. ID: 5002 **Organization:** *Not Specified* **Comment ID:** 361916 **Organization Type:** Unaffiliated Individual
Representative Quote: If GGNRA is truly concerned about environmental impact, why have I never seen them stop to pick up trash? Why do I see them driving on the beach just to hand out tickets/warnings to dog owners? Why are they allowed to drive motorcycles on the beach disturbing the wildlife just to give tickets to dog owners? Don't these practices alone cause a detrimental impact?

Corr. ID: 5221 **Organization:** *Not Specified* **Comment ID:** 362667 **Organization Type:** Unaffiliated Individual
Representative Quote: Try putting actual dog waste bags in the empty dispenser in the lot. And try making better signage letting people know all the rules. Inform and educate people, and then enforce the rules. The NPS has not provided a single ranger or staffer on the beach to make sure the restored wetland is properly cared for since the beach re-opened.

Corr. ID: 5627 **Organization:** *Not Specified* **Comment ID:** 364030 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston has essentially been abandoned for the past few YEARS by the GGNRA, leaving large portions of the trails in this beautiful area inaccessible for the elderly, the handicapped, families with strollers, and others. While the concrete trails used to be cleared after high winds have caused sand to build up, this has not occurred in the past few years. In fact, a very large sand berm has formed at the northern end that makes it the end point for many walkers who are able to and choose to go that far. Where have the workers been??

Some of the garbage bins along the trails have been removed so that the GGNRA doesn't have to do the work required to empty them.

The water fountain just off the parking area is a disgusting, malfunctioning mud puddle that needs attention. Necessary minor fixes to allow drainage have been ignored by GGNRA by our understanding that the GGNRA personnel involved in this project includes a number of inherently anti-dog people, which in and of itself demonstrates undue bias.

Corr. ID: 6710 **Organization:** *Not Specified* **Comment ID:** 369488 **Organization Type:** Unaffiliated Individual
Representative Quote: These conditions are present for months on end. The sand overflows from the beach on to and across the promenade path. Imagine a disabled person trying to make their way through mounds of sand on the walkway. And the planters on the left were stripped of their ice plant and native plants were planted, surrounded by red pea gravel. The plants died, the pea gravel became dislodged and flows on to the walkway to provide yet another hazard for the walker. The one photo where there appears to be a ridge running through the sand is actually the seawall. On the beach side the sand is up to the top of the seawall, and on the promenade side the sand has piled up so high the walkway has been obliterated. Yet in this SEIS the GGNRA complains about spending 1.5 hours a day picking up trash at Ocean Beach which is over 3 miles long. From these photos it does not appear 1.5 hours a day is enough, and it also appears that people are bringing their trash up off the beach and often placing it next to overflowing trash receptacles. You cannot put the responsibility for this mess on dogs. The GGNRA's poor performance in maintenance of Ocean Beach should preclude them from holding the property - it certainly does not meet the requirements as stated above in the documents of transfer.

Response: While the park does have a backlog of maintenance, similar to other national parks, it prioritizes where its funding is allocated, and relies on both philanthropic and volunteer stewardship to augment its Congressional appropriations. In its most recent visitor satisfaction surveys in 2015, the park received a 93% overall rating on its facilities by the public, while noting that it needs improvement in restrooms and signage that has been taken down or damaged. The park looks to improve in these areas; and, it will be improving its restrooms and signage as part of a parkwide program. Staff maintenance and enforcement often requires driving along former fire roads to address an issue; and, park staff are cognizant of park resources in those areas when they do. Where feasible, park staff walk or bike trails to perform their duties.

CONCERN STATEMENT: (Concern ID: 57427) The draft plan/SEIS should include the current revenue generated from issuing citations for leash and litter violations. The draft plan/SEIS should also include GGNRA budget information including the costs of administration and employees.

Representative Quote(s):

Corr. ID: 3824 **Organization:** *Not Specified* **Comment ID:** 359917 **Organization Type:** Unaffiliated Individual
Representative Quote: Please provide a revenue statement showing how much money in leash and litter violations you have historically collected versus the cost of your administration and employees so that I might respectfully consider a change of opinion.

Response: Please see chapter 4, Park Operations, which includes details on park funding for the final plan/EIS. Revenue from citations does not come back to the park, but is deposited directly to the Federal Treasury. Funding for the dog management plan implementation is a much smaller subset as summarized in chapter 4, Park Operations.

PO4000 - Park Operations: Impact Of Proposal And Alternatives

CONCERN STATEMENT: (Concern ID: 53402) Commenters stated that the presence of dogs and dog walkers is a benefit to GGNRA, as dog walkers often provide waste receptacles and clean up waste, benefiting park operations. The dog management plan would reduce the number of people who use the park, which would decrease support for the parks as well as impact visitors. Implementation of the dog management plan would result in increasing issues in the park, including homelessness, crime, and increased trash on the beaches, which would present a larger issue for park operations.

Representative Quote(s):

Corr. ID: 1520 Organization: Not Specified Comment ID: 352982 Organization Type: Unaffiliated Individual

Representative Quote: The users of the parks are its potential allies - the people who vote to support, who fund-raise, who come to the defense of the National Park system when it's threatened. Making policies that turn them off is bad not just for those with dogs, but for all of us who care about the environment and want others to care about it too. Many people feel their comments earlier were not considered in preparing this SEIS.

Corr. ID: 2075 Organization: Not Specified Comment ID: 355661 Organization Type: Unaffiliated Individual

Representative Quote: Further, if you continue to restrict access to the most active people within this county, you will find that these parks slowly fall from the public eye and when the next 'budget crisis' comes up, no one will be there to champion the cause to keep them open.

Corr. ID: 4250 Organization: Not Specified Comment ID: 353608 Organization Type: Unaffiliated Individual

Representative Quote: It will also discourage use of Fort Funston, which will only increase existing problems with vandalism and drug use by reducing the numbers of law-abiding and considerate citizens there. This ill-advised new policy will almost certainly increase the costs of maintaining Fort Funston at a time of severe budget challenges for the Park Service.

Corr. ID: 4824 Organization: Not Specified Comment ID: 361602 Organization Type: Unaffiliated Individual

Representative Quote: If Funston dog activity is limited, that place will likely see a crime spike as it is isolated and has many hidden nooks and crannies. In addition, dog walkers voluntarily have monthly cleanups of the park. People really care about and love the fort, and this cleanup is pure volunteer work that costs taxpayers nothing.

Corr. ID: 4828 Organization: Not Specified Comment ID: 353850 Organization Type: Unaffiliated Individual

Representative Quote: Without the people walking their dogs, many of the beaches would not be as clean. I regularly pick up all sorts of trash when picking up after my dog as do most of my friends.

Corr. ID: 5002 Organization: Not Specified Comment ID: 361917 Organization Type: Unaffiliated Individual

Representative Quote: If these areas are closed the impact on the rest of the city will take a toll. Dogs walkers walk their dogs at all times, in the morning, late at night. They have been one to report crimes, deaths, and other potential hazards on the beach. Dog walkers move out, homeless, vagrants, increased crime and gangs move in. Dog walkers act as a no cost preventive measure against these.

Corr. ID: 5676 Organization: Montara Comment ID: 364111 Organization Type: Unaffiliated Individual

Representative Quote: People have been responsibly walking their dogs both on and off leash in this area for decades. Dog walking, and being out enjoying the Rancho, has brought our community together and has actually been beneficial to the area by providing waste cans and bags, and facilitated communication and resolving of issues that arise in the open space (fallen trees, lost dogs or people, illegal dirt biking, etc)

Corr. ID: 6136 Organization: Not Specified Comment ID: 365591 Organization Type: Unaffiliated Individual

Representative Quote: The parks in our city are important to we who pay the bills (taxes), it is how we have our downtime, and if you tell me certain members of my family are no longer welcome, ie my dog, we will stop going and our parks will go unappreciated and could fall into the hands of droves of vagrant's encampments, trash, human feces, illegal activity, and even more used needles.

Corr. ID: 6649 **Organization:** *Not Specified* **Comment ID:** 368228 **Organization Type:** Unaffiliated Individual

Representative Quote: The communities of Montara, Moss Beach and El Granada have a long history of responsible off-leash dog walking in Rancho. The Montara Dog Group (MDG), which has over 400 members and represents over 600 dogs from Half Moon Bay to Pacifica, have been good stewards to the area, providing waste bins, promoting responsible dog guardianship and caring for an area the GGNRA, presently, does not have the infrastructure or resources to maintain.

Response: A clear, enforceable dog management policy and one that protects the park resources and reduces conflicts amongst users will contribute significantly toward the overall enjoyment of the park by all. Both dog walkers and non-dog walkers that help in general clean-up at particular park sites may also deter increased crime through their park activity and presence in certain park areas. Decreased park visitation is a hypothetical given the overall trending increase in visitation, although GGNRA does acknowledge that some users may change their visitation pattern or no longer visit. GGNRA has also received public comments from non-dog walkers stating they have been displaced, but would visit again if they could be assured of dog free areas. Thus, while there could be changes in visitation patterns, NPS has received no compelling studies or information suggesting that homelessness, crime, and increased trash on beaches would result from implementation of a dog management plan; furthermore, dog walking is still allowed in each of the 21 current NPS sites addressed by the plan (22 sites when including Cattle Hill), with eight areas within the 21 sites allowing off-leash dog walking.

CONCERN STATEMENT: (Concern ID: 53403) One commenter noted that reducing the areas where dogs are allowed would decrease the burden on enforcement staff, while another felt that this burden would not be decreased as officers would still need to patrol other areas. Some commenters noted that park staff would have to deal with the anger of individuals no longer allowed to walk their dogs in areas of the GGNRA.

Representative Quote(s):

Corr. ID: 1035 **Organization:** *Not Specified* **Comment ID:** 351461 **Organization Type:** Unaffiliated Individual

Representative Quote: This is a public park paid for using tax funds. Like many other public service, the rising costs of labor, lawsuits, and the increased bureaucracy create a budget deficit. However, the cost of the above will not be affected by eliminating off leash access. Rangers will still have to patrol/service the park, lawsuits will still occur, and the bureaucracy will still exist.

Corr. ID: 1450 **Organization:** *Not Specified* **Comment ID:** 352580 **Organization Type:** Unaffiliated Individual

Representative Quote: These regulations will create countless negative interactions between dogs and their owners and the legal enforcement of it will be an unwarranted expenditure of time and effort that should be spent elsewhere where real safety concerns exist.

Corr. ID: 5403 **Organization:** *Not Specified* **Comment ID:** 363174 **Organization Type:** Unaffiliated Individual

Representative Quote: The burden on the patrolling officers could be greatly reduced by reducing the area that domestic animals are allowed. While on-leash will always be the preference for naturalists the burden of cat and mouse game of on-leash/off leash game that is repeatedly played by irresponsible pet owners in the many areas of sensitive habitat could be virtually eliminated by making these changes.

Corr. ID: 5752 **Organization:** *Not Specified* **Comment ID:** 364238 **Organization Type:** Unaffiliated Individual

Representative Quote: Moreover, if you limit the areas where dogs can be off leash, you will have to increase the time and attention of your excellent personnel devoting themselves to enforcement. I would rather they use thier time and resources for more interesting activities such as park promotion and nature conservancy. Perhaps, more aggressive enforcement in areas that are designated on-leash needs to be done, thereby setting some clear boundaries.

Corr. ID: 6082 **Organization:** Dog owner **Comment ID:** 365378 **Organization Type:** Unaffiliated Individual

Representative Quote: This plan isn't reasonable. Our dogs need space to run. This plan will only cause angry conflicts in parks where people should be doing healthy things. The people working in these areas will take the brunt of the publics' anger if this enforced. Everybody loses under this plan.

Corr. ID: 6387 **Organization:** *Not Specified* **Comment ID:** 365820 **Organization Type:** Unaffiliated Individual

Representative Quote: A change in the policies governing these areas will cause confusion and anger, and will require a huge increase in staff to enforce, explain, and deal with all of the unhappiness that will be caused. I think this would

be doomed to failure.

Response: Additional staff would be hired when the dog management plan is implemented to increase law enforcement presence throughout the park and conduct outreach and education efforts. An intensive outreach and education effort will be instituted as part of the implementation effort which would provide additional communication options and a monitoring management program begun to document compliance with regulations and resource impacts. The results of the monitoring would also increase park awareness of situations requiring law enforcement response. The park recognizes that creating a new norm for certain park areas with a different history of use will take extra effort including signage, facility improvements, outreach and education as well as enforcement and community support.

CONCERN STATEMENT: (Concern ID: 56082) The Preferred Alternative is too expensive. NPS proposes to spend approximately \$2.5 million on implementing the Preferred Alternative, but does not have funding for increasing site accessibility for elderly and disabled or maintaining current infrastructure at the park.

Representative Quote(s):

Corr. ID: 6716 **Organization:** San Francisco Dog Owners Group **Comment ID:** 499778 **Organization Type:** Unaffiliated Individual

Representative Quote: THE PREFERRED ALTERNATIVE IS JUST TOO EXPENSIVE

The SEIS quotes the cost of the No Action Alternative as \$470,317 (p.1209). It quotes the cost of the Preferred Alternative as \$2,587,194 (p.1219). On p. 1053, the SEIS says: "If funding is available, the park would explore options that would allow improved access for disabled and elderly visitors to ROLAs, such as beach mats or improved trail surfaces." The GGNRA has budgeted \$2.5 million to deny people dogs access to 90% of the places where they can go now with their dog, but it cannot promise that there will be any money to allow elderly and disabled dog walkers to access what little off-leash space is left.

A January 2014 report by Environment California, titled "Death by a Thousand Cuts," describes how budget cuts in the GGNRA has led to significant downgrades in services, including closures of visitor centers, delays in repairs to buildings, roads, and trails. The GGNRA has cut back on garbage collection in recent months. Yet they plan to budget an additional \$2.5 million to hire little more than glorified dogcatchers. The GGNRA's priorities are skewed. Because the SEIS endorses this costly and misguided spending plan, it and the Dog Management Plan it supports cannot be accepted.

Response: Chapter 4, Park Operations discusses implementation of the final plan/EIS and funding, and identifies funding requirements to implement the dog management plan. Regarding accessibility, the park has identified areas for increased accessibility concerns from disabled visitors, both dog walkers seeking such improvements for on or off-leash, and non-dog walkers who believe their own access is at risk without dog free areas. Dog walking areas such as at Ft. Funston will have increased on and off-leash accessibility paths, such as the Coastal trail (on-leash) and the Chip Trail (off-leash) segments from main parking area to water fountain; and an accessible ramp to Baker beach for on-leash dogwalking. Beach mats have not proven to be sustainable and we are looking at different options for beaches like Central Beach and Rodeo Beach.

PP1400 - Pedro Point: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53279) Commenters request that trails be opened to dog walking at Pedro Point as there would be no impacts to special status species as stated in the draft plan/SEIS.

Representative Quote(s):

Corr. ID: 435 **Organization:** Not Specified **Comment ID:** 351366 **Organization Type:** Unaffiliated Individual

Representative Quote: Comments specific to Pedro Point Headlands: There is also multiple hiking parks managed by the county within the city of Pacifica (i.e. San Pedro Valley County Park) where dogs are not allowed at all so an alternative is needed where people can walk their dogs on longer trails as reported overwhelmingly by previous public comments.

Corr. ID: 435 **Organization:** Not Specified **Comment ID:** 351364 **Organization Type:** Unaffiliated Individual

Representative Quote: Comments specific to Pedro Point Headlands: This plan's preferred alternative B is not the best option. NPS draws its conclusions by stating that dogs on leash in areas other than Multi use coastal trail would have an impact on red legged frogs, garter snakes and Mission blue Butterflies. None of these species exist in this area and there are no bodies of water anywhere on the site as mentioned in the plan. The NPS analysis of the preferred alternative is highly flawed due to this non-existent impact on these endangered species.

Corr. ID: 2490 **Organization:** *Not Specified* **Comment ID:** 358993 **Organization Type:** Unaffiliated Individual
Representative Quote: Concerning Rancho Corral De Tierra, where I live near Montara. For years and years the community has enjoyed this area as dog-accessible. Very few, if any, problems were reported before NPS took over.

Now NPS is in charge and the community of dog-owners (who are very close to the majority of Montara residents) are all but excluded. Not only that, but NPS is showing an aggressive attitude and the use of potentially lethal force against those dog walkers who dare to use the land in the fashion that they are accustomed to, and have been allowed to, for decades.

These plans are a huge overreach and a draconian burden on all dog-owners, especially those in San Mateo County where so much open land in GGNRA. There is no effort for a fair balance at all; and all the exclusions seem clearly based on politics, not science.

I can only ask that you please please reconsider these plans. Allow more dog walking in GGNRA San Mateo County lands - - most especially in those areas like Rancho Corral De Tierra and Pedro Point Highlands that have been available to dog walkers for generations (and are no small reason why we live here).

Corr. ID: 5252 **Organization:** *Not Specified* **Comment ID:** 362815 **Organization Type:** Unaffiliated Individual
Representative Quote: Pedro Point Headlands: The trails that are currently maintained by the Pacifica Land Trust (South Ridge, Middle Ridge and Arroyo Trail should be considered as on-leash areas. The habitat does not include areas of concern for red-legged frogs and SF garter snakes.

Corr. ID: 6645 **Organization:** Pacifica City Council **Comment ID:** 368199 **Organization Type:** Unaffiliated Individual

Representative Quote: Pedro Point:

We suggest opening up the South Middle and Valley Ridge Trails to on-leash dog access. These Trails would connect to the Devils Slide Trail slated to open on March 22, 2014 to on-leash access making Pacifica a destination for multiple visitor experiences.

Response: Pedro Point is no longer being considered for dog walking in the Dog Management Plan because NPS will not acquire management control over Pedro Point. This area will instead be conveyed to San Mateo County under a separate process. The County will be responsible for planning for future use of this area.

PS1000 - Comment Regarding Public Scoping Process

CONCERN STATEMENT: (Concern ID: 53404) Commenters stated that despite overwhelming public comments against the draft plan/EIS or suggesting changes to the draft plan/EIS, no significant changes were made in the draft plan/SEIS. As a result, many commenters expressed the belief that the public comment process was simply for show. One commenter noted that the NPS must not consider fewer comments received on the draft plan/SEIS as representative of satisfaction with the document.

Representative Quote(s):

Corr. ID: 82 **Organization:** *Not Specified* **Comment ID:** 339916 **Organization Type:** Unaffiliated Individual

Representative Quote: I had hoped that this new plan would be significantly different from the original GGNRA dog management plan, because thousands of people-the overwhelming majority-submitted substantive comments in opposition to the plan. But the GGNRA did not make significant changes. They ignored what people want, and are moving forward with an extremely unpopular plan no matter what we say.

Corr. ID: 1488 **Organization:** *Not Specified* **Comment ID:** 352898 **Organization Type:** Unaffiliated Individual

Representative Quote: However, if we can, I would like to make the point that GGNRA should not be allowed to make the argument if the number of comments decrease on this second SEIS, this indicates any less dissatisfaction. You must consider several other reasons why the number of comments may decrease, e.g.,:

- * The 2nd draft (SEIS) clearly ignored the comments from the 1st, so many are disenchanted with the process and believe it is a waste of time.

- * In general, it is hard enough to get people to find time to make a comment. To ask them to make multiple is exponentially more difficult.

- * Some now want to boycott this process by refusing to participate.

Corr. ID: 2738 Organization: Not Specified Comment ID: 357155 Organization Type: Unaffiliated Individual
Representative Quote: Over the years, I have participated in the planning process for the Dog Management Plan, have testified at many meetings about it, sat on the rule making committee, and written many comments letters. During this entire process I feel my point of view, as well as those of tens of thousands of other dog owners, have been completely ignored by the GGNRA.

Corr. ID: 2933 Organization: DogPAC of San Francisco Comment ID: 355235 Organization Type: Unaffiliated Individual

Representative Quote: This plan was put together with minimal input and feedback from the general public. Only special interest groups who are already skilled at this type of process really got to give input fairly.

Corr. ID: 2964 Organization: DogPAC of San Francisco Comment ID: 355275 Organization Type: Unaffiliated Individual

Representative Quote: The policies that are being set forth are too restrictive and the GGNRA is not listening to the vast majority of people who are responding to this who are against their restrictions. This is recreational land, not Mt. Rushmore or The Grand Canyon.

Corr. ID: 4549 Organization: Not Specified Comment ID: 360560 Organization Type: Unaffiliated Individual
Representative Quote: I believe the supporters of this effort are not going to be as loud as the opposition so I sincerely hope that the NPS take into consideration the years of formalized complaints filed by families of children who have been bitten, elderly who cannot safely walk down the street, beach-goers who cannot find a clean spot to lay their blanket, and cannot sit without fear that a dog is going to charge at their children.

Corr. ID: 6638 Organization: Not Specified Comment ID: 367565 Organization Type: Unaffiliated Individual
Representative Quote: The entire process has been so disheartening that I almost decided to forgo this last ditch comment period because it's increasingly clear that support for pets has continued to relentlessly gnaw away at any semblance of wildlife protection in the GGNRA. There's no question that Mike Lynes' statement is absolutely accurate ' wildlife continues to be pushed aside by the alarmingly boisterous and well-organized dog booster groups, as well as most politicians and newspaper publishers who all seem to confuse affection for pets with concern for wildlife.

Response: Following the public comment period on the draft plan/EIS and draft plan/SEIS, NPS staff reviewed all public comments and discussed which proposed changes were feasible within the context of the plan objectives. Changes to the alternatives were made both in the draft plan/SEIS and in the final plan/EIS and rule as a result of public comment. Comments received have been responded to, including suggestions for new or different alternative elements, with a rationale provided as to why NPS did or did not adopt an alternative element.

CONCERN STATEMENT: (Concern ID: 53405) Commenters cited issues with public notification, ease of access and availability of the document and comment forms, the size of the document, and other issues. Many commenters mentioned either support or dislike of the extension of the public comment process.

Representative Quote(s):

Corr. ID: 204 Organization: Not Specified Comment ID: 350107 Organization Type: Unaffiliated Individual
Representative Quote: The comment period runs from September to January, how come the announcement poster was posted only for one day? Are you afraid to let people know what is going on?

Corr. ID: 439 Organization: Not Specified Comment ID: 351372 Organization Type: Unaffiliated Individual
Representative Quote: You have done a poor job of informing Fort Funston users of your proposed changes.

Corr. ID: 893 Organization: Not Specified Comment ID: 353603 Organization Type: Unaffiliated Individual
Representative Quote: My main observation, however, is that the Dog Management Plan document is simply overwhelming. I can't imagine how anyone has the bandwidth to really take in all this information. Unless one is an attorney and used to dealing with such massive documents, I don't think the average person can absorb it all. Perhaps a summary document with the important points and summarized options would be useful.

Corr. ID: 1171 Organization: Not Specified Comment ID: 351885 Organization Type: Unaffiliated Individual
Representative Quote: I was also confused by the email I received a couple weeks ago stating it contained a PDF link

to the new proposed plan. I tried to find it, but only found that the plan is in public libraries? Really, is that true? In this time of technological wonder you can't send out the plan? One has to go to the library. This seems like a very bad idea and a decision that will keep many people from reading the long-awaited plan.

Corr. ID: 1182 **Organization:** *Not Specified* **Comment ID:** 351930 **Organization Type:** Unaffiliated Individual
Representative Quote: When you refer to "continued concern" of some stakeholders for the reason to again extend the comment period I hope you realize how that comes off as less than credible. Shame on you for caving into the "progressive" politics of the city and the bully tactics of the dog community by giving them even more time to ruin the experience for the rest of us in the GGNRA.

Corr. ID: 2509 **Organization:** *Not Specified* **Comment ID:** 359009 **Organization Type:** Unaffiliated Individual
Representative Quote: Suggestion: Can you make the link to this Comments page easier to locate on your website? Currently, it is necessary to follow links or drill down to find the comment page. Perhaps you can make the link stand out somehow with bold text in a different size or color?

Corr. ID: 2877 **Organization:** DogPAC of San Francisco **Comment ID:** 354890 **Organization Type:** Unaffiliated Individual
Representative Quote: Additionally, the public comment period is ineffective because it requires citizens to make comments in a cumbersome and time-consuming manner.

Corr. ID: 4373 **Organization:** *Not Specified* **Comment ID:** 364129 **Organization Type:** Unaffiliated Individual
Representative Quote: Lastly, Little if anything has been done to make the public aware of this plan, when so many will be negatively effected.
 If it were not for the email I received from friends with pets that are aware of the GGNRA's actions and intents. I have seen ZERO information regarding this plan. So how many other pet owners do not even know to respond or comment. Please consider this when you are counting the responses you receive..

Corr. ID: 5020 **Organization:** *Not Specified* **Comment ID:** 362023 **Organization Type:** Unaffiliated Individual
Representative Quote: it is nearly impossible to wade through the 2,200 page document to make sense of it or find any of the required foundation or support for decisions

Corr. ID: 5751 **Organization:** *Not Specified* **Comment ID:** 364234 **Organization Type:** Unaffiliated Individual
Representative Quote: I would also like to see a real public notification process, with posting at trails that are affected or having a mailing list so that the public can stay up to date on the changes.

Response: Public meetings for the draft plan/EIS and draft plan/SEIS were announced through the Federal Register website, on the park website, in a newsletter sent to approximately 7,000 individuals and/or organizations on the dog management mailing list, in an email to the general park contact list, and in local newspapers. Extensive outreach was provided to dog groups, environmental organizations, local governments, and other interested parties. The public meetings were held over a two week period from mid-afternoon to late-evening, in each county surrounding the park. Online commenting on the draft plan/EIS and draft plan/SEIS was available on the park's planning website for over 120 days on both the draft plan/EIS and draft plan/SEIS (due to several public comment extensions), and by mailing hard copy letters to the Superintendent. Public meeting materials were also posted on the park's website and around the park at dog walking locations. Copies of the draft plan/EIS and draft plan/SEIS were also made available at multiple public libraries in each county.

CONCERN STATEMENT: (Concern ID: 53406) Commenters discussed issues with the public meetings held by NPS. Several commenters were afraid to attend meetings for their safety; some commenters noted that the times meetings were held were not convenient; some had comments on the meeting materials and format.

Representative Quote(s):

Corr. ID: 1171 **Organization:** *Not Specified* **Comment ID:** 351884 **Organization Type:** Unaffiliated Individual
Representative Quote: The fact is I am afraid to attend your meetings, anyway, because of how aggressive dog-owners are in shouting people down whose ideas they don't like. I would come to your meeting if I could find a copy of your policy and if you could assure my safety if I expressed these opinions. Can you guarantee the safety of a non dog owner? Let me know.

Corr. ID: 1181 **Organization:** *Not Specified* **Comment ID:** 351927 **Organization Type:** Unaffiliated Individual

Representative Quote: Trying to attend dog meetings to put forth my point of views is too scary. I have been to the dog policy meetings in San Francisco and they boo and hiss at you. They call you names and are out of control. It is a mob mentality.

Corr. ID: 1352 **Organization:** *Not Specified* **Comment ID:** 352386 **Organization Type:** Unaffiliated Individual

Representative Quote: It is truly astonishing after all of this time developing the DOG MANAGEMENT PLAN that GGNRA has made the decision to hold an informational meeting about the Plan in San Francisco during working hours! Not on the coast during the evening when the people who are affected by the Plan can actually attend and have input.

Corr. ID: 1910 **Organization:** *Not Specified* **Comment ID:** 354528 **Organization Type:** Unaffiliated Individual

Representative Quote: The NPS say they are open for comments and suggestions - - but I'm not so sure. The Open House held on Jan 30th 2014 was supposed to run until 12:30 pm. But by 11:45 am it was all packed-up and in boxes! Another example of the NPS pay lip-service to listening to comments, but really just pushing through their preferred plans at the expense of all dog owners and dog lovers.

Corr. ID: 2420 **Organization:** *Not Specified* **Comment ID:** 368514 **Organization Type:** Unaffiliated Individual

Representative Quote: I have to say, I've been to several public information meetings. And one thing I don't like about the GGNRA's presentation is that the diagrams you had at your public meetings did not show before and after representations of the areas you are seeking to change. So it's difficult to imagine the entirety of what is potentially changing. But it's clear that I will be losing public-access areas to recreate

Corr. ID: 5308 **Organization:** *Not Specified* **Comment ID:** 362944 **Organization Type:** Unaffiliated Individual

Representative Quote: On a rainy night in January of 2001 I was among 2000 Bay Area citizens who came to protest the GGNRA/NPAs decision to rescind the 1979 Pet Policy which would end off leash dog walking recreation throughout the GGNRA. Many of us were standing outside in the rain because the venue you selected for this event was too small to accommodate all of us inside. It was not a good night to be stuck outside. But this meeting was so important to each one of us that despite the rain, cold and darkness, we did not leave.

Response: Public meetings for the draft plan/EIS and draft plan/SEIS were announced through the Federal Register website, on the park website, in a newsletter sent to approximately 7,000 individuals and/or organizations on the dog management mailing list, in an email to the general park contact list, and in local newspapers. Extensive outreach was provided to dog groups, environmental organizations, local governments, and other interested parties. The public meetings were held over a two week period from mid-afternoon to late-evening, in each county surrounding the park. Online commenting on the draft plan/EIS and draft plan/SEIS was available on the park's planning website for over 120 days on both the draft plan/EIS and draft plan/SEIS (due to several public comment extensions), and by mailing hard copy letters to the Superintendent. Public meeting materials were also posted on the park's website and around the park at dog walking locations. Copies of the draft plan/EIS and draft plan/SEIS were also made available at multiple public libraries in each county. Law enforcement personnel were posted at each public meeting to ensure public safety.

CONCERN STATEMENT: (Concern ID: 53407) Commenters made suggestions for the public comment period. Suggestions included holding a vote, and creating a forum for groups to discuss recreation management.

Representative Quote(s):

Corr. ID: 1413 **Organization:** *Not Specified* **Comment ID:** 352505 **Organization Type:** Unaffiliated Individual

Representative Quote: How about you put this to a vote (this IS America, isn't it?) instead of imposing your authority on the public? Does ANYTHING that we (the dog-loving public) say even matter at this point? Surely does not feel like it.

Corr. ID: 1566 **Organization:** *Not Specified* **Comment ID:** 353113 **Organization Type:** Unaffiliated Individual

Representative Quote: If this is truly a democratic society then let the people vote and then stick with that decision. If the people of Marin actually vote to accept less space for off-leash play for their dogs than I'll eat my words and move to a more dog-friendly location. But I think the GGNRA will be eating dog biscuits instead. Take it to the people!

Corr. ID: 2686 **Organization:** *Not Specified* **Comment ID:** 405840 **Organization Type:** Unaffiliated Individual

Representative Quote: A proper forum should be set up to review recreation management and should include dog walkers and other park users such as cyclists, equestrians, hikers, and surfers and sail boarders. This type of committee would be valuable for the GGNRA in order to hear directly from their users and to engender their support in maintaining the GGNRA lands through volunteer opportunities supporting collective access.

Corr. ID: 5711 **Organization:** *Not Specified* **Comment ID:** 364181 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly urge the NPS staff hold an *actual* public collaborative process to balance the needs of the local population with regards to the use of these areas.

Corr. ID: 5958 **Organization:** *Not Specified* **Comment ID:** 364805 **Organization Type:** Unaffiliated Individual
Representative Quote: Take a poll or vote of local residents on whether your proposed dog restrictions are merited. Posting signs and websites is not sufficient outreach for a change this impactful on the lives and health benefits to local residents. I submit the local users of Rancho will deny the need for dog restrictions - but might heartily endorse restrictions on mountain bikes

Response: Please see the final plan/EIS, chapter 1, Scoping Process and Public Participation, and chapter 5 for additional information regarding public involvement in the planning effort. Significant public involvement on dog walking in GGNRA has occurred since 2001, including establishment of a Negotiated Rulemaking Committee, which was unable to reach a consensus agreement on the majority of issues related to dog walking within GGNRA. Due to restrictions in the Federal Advisory Committee Act and the inability of the previously chartered advisory group to reach consensus, the NPS would likely not seek to establish another advisory group. As NPS moves forward with plan implementation, the NPS will seek ways to engage key stakeholders and the broader public in providing input on future implementation issues. The NPS will also engage the public on the Monitoring Management Strategy.

The NPS does not manage national parks by popular vote. The NPS solicits and carefully considers public comments, such as those submitted on the Dog Management Plan, and makes management decisions that conform to NPS's legal and policy mandates.

CONCERN STATEMENT: (Concern ID: 53408) Commenters were satisfied with the public comment process. They felt that the comment period was extensive, and that the meeting format was successful.

Representative Quote(s):

Corr. ID: 3621 **Organization:** *Not Specified* **Comment ID:** 359263 **Organization Type:** Unaffiliated Individual
Representative Quote: The Special Rule that the park has devised for these lands is intended to meet some of the traditional needs of one group of park users. It cannot meet all of their desires. The Special Rule has had extensive public process. The park's administration has worked with the public for 13 years to craft regulations for dog owners that will give them opportunities not granted elsewhere in the National Park System.

Corr. ID: 5677 **Organization:** *Not Specified* **Comment ID:** 364114 **Organization Type:** Unaffiliated Individual
Representative Quote: I have attended several of the open houses and found your staff helpful and the general tone of the conversation to be positive and constructive even among folks with differing opinions.

Response: NPS agrees with this comment.

PS1200 - Park Response to Public Comments on January 2011 Draft Plan/EIS

CONCERN STATEMENT: (Concern ID: 53409) Many commenters felt that the comments on the draft plan/EIS were largely ignored, particularly those of the dog walking community. They also feel that NPS is not working with the neighboring communities to resolve the dog management plan. The draft plan/SEIS did not include a summary of draft plan/EIS comments.

Representative Quote(s):

Corr. ID: 286 **Organization:** *Not Specified* **Comment ID:** 350474 **Organization Type:** Unaffiliated Individual
Representative Quote: As far as I can see reading the proposed documentation for the NPS Dog Plan, the NPS has ignored the majority opinion in resisting the curtailment of people walking their dogs and enjoying a healthy activity. The NPS can't have failed to grasp, after the last round of scoping, that the majority of people want to be able to walk their dogs off leash in more areas than the NPS currently propose. Further this latest round of recommended legislation is even more restrictive than the NPS's initial scope. What is the point of spending the government's money to seek opinion if that opinion is to be utterly ignored? What is the point of seeking our opinion a second and third time to only ignore the majority will?

Corr. ID: 1621 **Organization:** *Not Specified* **Comment ID:** 353214 **Organization Type:** Unaffiliated Individual

Representative Quote: The proposed changes you outline in your dog management plan seem to ignore the concerns and suggestions of a large number of public commentators.

I do not see the comments of dog owners adequately reflected in your proposed use plans.

Because your plans do not include balanced options for the public to vote on, including options that increase access to the area by all segments of the community, I do not believe the issue has been adequately evaluated. I do not support any change to the current use rule, mandated and set out at the time of the grant of lands in 1979.

Corr. ID: 2902 **Organization:** DogPAC of San Francisco **Comment ID:** 355183 **Organization Type:** Unaffiliated Individual

Representative Quote: I oppose The Golden Gate National Recreation Area (GGNRA) Draft Dog Management Plan because...

SEIS did not adequately consider comments to the DEIS from dog walkers and appears to have dismissed nearly all of them. There is no information in the SEIS about why these comments (e.g., negative impacts on community and human health from off-leash restrictions) were dismissed and not considered in the development of the preferred alternative. The SEIS lists many, many comments from people opposed to dog walking and very few from people who support dog walking. The SEIS copies, without change, entire sentences and text from the DEIS about studies of dog impacts, especially on wildlife and birds, even though DEIS comment showed that this text was inaccurate, misleading, and misrepresented what the studies actually said. Yet the SEIS copied it word for word. Comments supporting dog walking were not used.

Corr. ID: 4122 **Organization:** *Not Specified* **Comment ID:** 362050 **Organization Type:** Unaffiliated Individual

Representative Quote: The new dog management plan did not adequately consider comments to the earlier version of the plan from people who support dog walking and appears to have dismissed nearly all of them. There is no explanation why these comments from 2011 about issues such as negative impacts on the community and human health from off-leash restrictions were not considered in the development of the preferred alternative.

Corr. ID: 6716 **Organization:** San Francisco Dog Owners Group **Comment ID:** 499775 **Organization Type:** Unaffiliated Individual

Representative Quote: THE GGNRA IS NOT FOLLOWING INTERIOR SECRETARY SALLY JEWELL'S LEAD ON WORKING WITH NEIGHBORING COMMUNITIES

As San Francisco Supervisor Scott Weiner noted at a Town Hall Forum on the GGNRA's Dog Management Plan sponsored by U.S. Representative Jackie Speier on January 30, 2014, "The entire political leadership of San Francisco is expressing concerns" with the GGNRA Preferred Alternative for a Dog Management Plan. Since the SEIS was released, the San Francisco Board of Supervisors, San Francisco Mayor Ed Lee, US Representatives Jackie Speier and Nancy Pelosi, the Marin County Board of Supervisors, and then-President of the San Mateo County Board of Supervisors Don Horsley have all passed resolutions or written letters to the GGNRA expressing concerns about the proposed Dog Management Plan.

At a November 7, 2013 appearance before the Commonwealth Club in San Francisco, Interior Secretary Sally Jewell said that the National Park Service should work closely with neighboring cities like San Francisco. Unfortunately, as evidenced by the previous paragraph, the GGNRA is not working with the surrounding communities on a Dog management plan, and, instead is pushing ahead with a highly unpopular plan no matter what the neighbors say.

Secretary Jewell also talked about the need for the National Park Service to "welcome young people on our public lands." Ironically, many young people who currently walk their dogs in the GGNRA will no longer be welcome to enjoy this recreation on GGNRA land if the Preferred Alternative is adopted. Because it goes against what the Secretary of the Interior has said should be goals of the National Park Service, the SEIS and the Dog Management Plan it supports cannot be accepted.

Response: Following the public comment period on the draft plan/EIS, NPS staff reviewed all public comments and considered whether changes requested by the public were appropriate and feasible within the context of the plan's purpose, need and objectives. Changes to the alternatives and modifications to the plan's impact analysis section were made in the

draft plan/SEIS in response to public comments received on the draft plan/EIS, including the following:

- addition of conditions for walking four to six dogs under an NPS permit
- changes to two Voice and Sight Control Areas (formerly known as Regulated Off-Leash Areas, ROLAs) - Crissy Airfield and upper Fort Funston
- addition of four new trail segments for on-leash dog walking (Rancho Corral de Tierra)
- addition of clarifying definitions
- a few minor adjustments to dog walking areas based on new information or public suggestions
- clarified considerations for the Monitoring Management Program

The NPS solicited another round of public comments following release of the draft plan/SEIS. This final plan/EIS appendix responds to all substantive comment types received on the draft plan/EIS and draft plan/SEIS. Depending on the comment, the NPS either made changes to the text of the draft plan/EIS or draft plan/SEIS, or a response to the comment is provided in this appendix.

CONCERN STATEMENT: (Concern ID: 53410) Commenters on the 2011 draft plan/EIS provided many viewpoints, including the viewpoints of those who did not own dogs. Some commenters noted areas where comments on the draft plan/EIS were addressed in the draft plan/SEIS through changes to the preferred alternative.

Representative Quote(s):

Corr. ID: 111 **Organization:** *Not Specified* **Comment ID:** 345827 **Organization Type:** Unaffiliated Individual

Representative Quote: If you read through the comments of the previous EIR, you will notice a lot of different viewpoints. Though the dog lobby often yells the loudest, there are others that want to use and enjoy these resources as well. They have made very logical and compelling arguments for some sort of balance between different users.

Corr. ID: 6645 **Organization:** Pacifica City Council **Comment ID:** 368192 **Organization Type:** Unaffiliated Individual

Representative Quote: The City of Pacifica had previously provided comments on the Draft Dog Management Plan/EIS in 2011 (copy attached). Thank you for modifying the preferred alternative for Mori Point by adding the Pollywog Trail as an on-leash trail. We also appreciate the modification of the preferred alternative for Sweeney Ridge/Cattle Hill to add on-leash dog walking at Sweeney Ridge on Sneath Lane and on the Baquiano Trail from Fassler Avenue to, and including, the Farallon View Trail.

Response: Comment Noted

CONCERN STATEMENT: (Concern ID: 53411) An analysis of the impacts to nearby parks was requested in 2011 by the San Francisco Board of Supervisors, but this has not been completed by the NPS. Commenters also noted issues with the NPS addressing comments from the USEPA.

Representative Quote(s):

Corr. ID: 1100 **Organization:** *Not Specified* **Comment ID:** 351637 **Organization Type:** Unaffiliated Individual

Representative Quote: The plan does not adequately analyze impacts on nearby parks of the Preferred Alternative. This analysis was requested by the public and by the San Francisco Board of Supervisors in 2011. The new plan claims that, because some off-leash space will still be available in the GGNRA, even though much smaller, most people will continue to walk their dogs there and not move to nearby city parks. No evidence is given to support either assumption. I am sure that places like Stern Grove will be inundated with dogs if the preferred alternative is implemented.

Corr. ID: 1315 **Organization:** *Not Specified* **Comment ID:** 405841 **Organization Type:** Unaffiliated Individual

Representative Quote: The plan does not adequately analyze impacts on nearby parks of the Preferred Alternative. This analysis was requested by the public and by the San Francisco Board of Supervisors in 2011. The new plan claims that, because some off-leash space will still be available in the GGNRA, even though much smaller, most people will continue to walk their dogs there and not move to nearby city parks. No evidence is given to support either assumption.

Corr. ID: 1636 **Organization:** *Not Specified* **Comment ID:** 353231 **Organization Type:** Unaffiliated Individual

Representative Quote: It also does not adequately analyze the impact of the preferred alternative on nearby parks. This analysis was requested by the public and by the San Francisco Board of Supervisors in 2011.

Corr. ID: 4373 **Organization:** *Not Specified* **Comment ID:** 364126 **Organization Type:** Unaffiliated Individual

Representative Quote: The SEIS has failed to respond to all comments submitted by the US EPA.

Response: Please see chapter 4, Impacts on Nearby Dog Walking Areas Outside of GGNRA by Alternative for an analysis of impacts to surrounding areas. The EPA also issued a letter, following changes from the draft plan/EIS to the draft plan/SEIS, acknowledging NPS had addressed this issue by issuing a letter noting "Lack of Objection" to the draft plan/SEIS.

CONCERN STATEMENT: (Concern ID: 53412) Commenters noted that the draft plan/SEIS used comments against dog walking to implement more restrictions, but did not use comments supporting dog walking. One commenter suggested that the comments from commenters on the previous process should be considered in the draft plan/SEIS

Representative Quote(s):

Corr. ID: 1414 **Organization:** Not Specified **Comment ID:** 405842 **Organization Type:** Unaffiliated Individual

Representative Quote: Comments supporting dog walking were not used to argue that there should be more off-leash restrictions, while comments opposing dog walking were used to argue for more restrictions.

Corr. ID: 5552 **Organization:** Not Specified **Comment ID:** 363938 **Organization Type:** Unaffiliated Individual

Representative Quote: I am dismayed that the SEIS contained only very minor changes from the DEIS, despite the significant number of public comments which opposed the plan. It appears that the GGNRA intended to severely limit off-leash dog access all along and has not operated in good faith to represent both sides.

Of the 4,700 public comments the GGNRA says they received, they do not say how many opposed restrictions on dog walking and how many supported them. An independent analysis of the DEIS comments showed that the vast majority (at least 3:1) supported off-leash dog walking. However, the SEIS over-represents comments from people who oppose off-leash dog walking and under-represents comments from those who support off-leash dog walking.

Corr. ID: 6261 **Organization:** Dogpatch Dogs **Comment ID:** 366313 **Organization Type:** Unaffiliated Individual

Representative Quote: Thousands of Bay Area citizens responded in prior Golden Gate National Recreation Area comment periods. To be fair, their numbers should also be counted in the tally of respondents for this current comment period.

Corr. ID: 6588 **Organization:** San Francisco Dog Owners Group **Comment ID:** 369638 **Organization Type:** Unaffiliated Individual

Representative Quote: THE SEIS DOES NOT INCLUDE A SUMMARY OF THE DEIS COMMENTS

Both the SEIS and the DEIS Comment Response Report mention the total number of comments about the DEIS that they received (over 4,700 pieces of correspondence). Neither document gives an overall summary of the comments - how many comments opposed the GGNRA's Dog Management Plan? How many supported it? How many supported off-leash dog walking? How many opposed it? The DEIS Comment Response Report does include a list of sample comments to give a flavor of the overall comments, but there is no tally of how common those comments were.

The description of public comments on the ANPR on p. 9 of the SEIS indicates that 71% of the respondents favored off-leash dog walking at selected sites in the GGNRA. This allows you to get an overall sense of the public comment and to put it in some kind of context. There is no similar overall summary of the public comment on the DEIS.

An independent analysis of the DEIS comments showed that they were overwhelmingly opposed to the GGNRA's proposed Dog Management Plan and overwhelmingly supportive of dog walking, including off-leash. You would never know that, however, from reading either the SETS or the DEIS Comment Response Report. Every time there has been public comment (the ANPR, the DEIS), it favors dog walking, yet the GGNRA continues to push to restrict access for people with dogs against the will of the people.

Response: Following the public comment period on the draft plan/EIS and draft plan/SEIS, NPS staff reviewed all public comments and discussed which proposed changes were feasible within the context of the plan objectives. Changes to the

alternatives were made both in the draft plan/SEIS and in the final plan/EIS and rule as a result of public comment. Because the draft plan/SEIS was a comprehensive reissuance of the draft plan/EIS, it did not include draft plan/EIS comment responses as NPS did not want to prejudice comments made on the draft plan/SEIS; comment responses to public comments received are included in the final plan/EIS.

CONCERN STATEMENT: (Concern ID: 53413) The NPS did not provide the numbers of commenters who supported and opposed the plan in the draft plan/SEIS.

Representative Quote(s):

Corr. ID: 4898 **Organization:** *Not Specified* **Comment ID:** 361731 **Organization Type:** Unaffiliated Individual

Representative Quote: It is a disappointment to me that this anti-dog agenda has extended to the inadequate response of the SEIS to comments made by those in favor of dog walking.

What is incredible is that of the 4700 comments obtained on the DEIS, there has been no disclosure of how many were for and how many against. What is the purpose of seeking opinions when they are not released and have no chance of impacting the policy or impacting public opinion? Is it merely to give window dressing to prescribed process?

Corr. ID: 4975 **Organization:** Sierra Club **Comment ID:** 361883 **Organization Type:** Unaffiliated Individual

Representative Quote: I also object to the lack of accounting of and response to the extensive comments that were made to the Draft Environmental Impact Statement. Of the 4700 comments how many supported off leash use? How many support restrictions? Such extraordinary restrictions require extraordinary proof. None of the comments and suggestions (such as time restrictions at Baker Beach) were mentioned.

Corr. ID: 6142 **Organization:** *Not Specified* **Comment ID:** 365604 **Organization Type:** Unaffiliated Individual

Representative Quote: The Supplemental Environmental Impact Statement (SEIS) does not adequately consider comments to the Draft Environmental Impact Statement (DEIS) from dog walkers and appears to have dismissed nearly all of them. There is no information in the SEIS about why these comments (e.g., negative impacts on community and human health from off-leash restrictions) were dismissed and not considered in the development of the preferred alternative.

SEIS never gives results of public comment on the DEIS. It reports more than 4,700 comments were received, but says nothing about how many comments were in support or opposition. Shouldn't public sentiment be reported and considered?

Corr. ID: 6629 **Organization:** *Not Specified* **Comment ID:** 367970 **Organization Type:** Unaffiliated Individual

Representative Quote: You encourage us to "focus [our] comments on the changes in the draft plan/SEIS that were made as a result of comments on the 2011 draft EIS" (1), but these changes are so minimal, compared to the extraordinary destruction of dog-walking access in both the draft and supplemental EIS, that one must focus on the fact that you have disregarded the overwhelming opposition to your "Preferred Alternative", reflected in thousands of responses to the DEIS.

It is instructive that the SEIS never explicitly states the numbers opposed to the DEIS or the reasons for that opposition in clear qualitative or quantitative form. One is given "sample comments", whether they are representative of many, few or one. From the data that are available, one may posit that you are disregarding the profound negative response to your "preferred alternative". For example, of the respondents who made what you consider "substantive" comments regarding Fort Funston, only 33 supported your plan. On the other hand, 522 substantive responses opposed the plan. Another 271 responses suggested other alternatives, or changes in proposed alternatives 2. These figures alone should have sent the GGNRA back to the drawing board for a rethink of the importance and value of dog walking in the GGNRA. but instead resulted in only minor changes to that same benighted and disastrous "preferred alternative".

Response: The public comment period is not intended to be a vote. Comments stating support or opposition to the dog management plan were considered non substantive.

RA1400 - Rancho Corral de Tierra: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53280) Many commenters are opposed to the ROLA between LeConte and Tamarind streets in the Rancho Corral de Tierra area. This site is adjacent to an elementary school and commenters feel that the presence of dogs will endanger the children. In addition, the site is in a quiet neighborhood with narrow, poorly paved

streets. Commenters are concerned about the effects of heavier traffic and barking dogs in the neighborhood. One commenter stated that the ROLA would be too small to provide any benefit to dogs and dog owners.

Representative Quote(s):

Corr. ID: 4488 **Organization:** *Not Specified* **Comment ID:** 365397 **Organization Type:** Unaffiliated Individual

Representative Quote: I am writing specifically to protest Alternative C. It proposes an off-leash fenced area between LeConte and Tamarind Streets, Montara, CA. (See text at bottom of letter from page 489. It is also mentioned on pp. 79, 489, 548, 699, and other pages throughout the SEIS.)

My reasons for protesting a dog park in a residential area near an elementary school are:

1. Tamarind Street is very narrow street and lacks sidewalks. Currently, cars often have to take turns passing through the narrowest parts, because there is not room enough for two cars to pass. The street is not equipped to support more traffic and more parking.
2. Le Conte Street on which the Farallone Elementary School is located is not a public street, but a privately owned street. (There are some of those in Montara.) The street is in a dreadful state of disrepair.
3. There is no public street lighting on either Le Conte Street or Tamarind Street.
4. It is unwise to put a public dog park immediately adjacent to an elementary school where children could be exposed to possible predators. This proposed park could put our children at risk.
5. For a large concentration of dogs to collect in the middle of our small residential area would lead to a dramatically noisy situation. Barking dogs and owners shouting commands would disturb nearby residents. Neighboring dogs will join in the barking. We residents will experience both a decrease in our quality of life and our property values. We would lose our quiet neighborhood.

ALTERNATIVES:

1. Why not put the dog park near the large planned parking lot to be constructed off Highway 1. With the planned central parking area, there would be a place to distribute plastic bags for poop-pickup and a place to dispose of those poop bags.
2. A fenced area close to Highway 1 is more logical than in a tiny residential neighborhood by an elementary school. It would enable easy access for other neighborhoods, such as Moss Beach, and in general easy access for more people.
3. By Highway 1 parking, the barking of dogs will not disturb local residents. Children will not be put at risk from predators. A quiet peaceful neighborhood will be maintained, and our property values will not be lessened.

Corr. ID: 5491 **Organization:** *Not Specified* **Comment ID:** 363363 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm writing to you to express my deep concern about the alternative to create a Regulated Off-Leash Area for dogs between Le Conte and Tamarind streets in Montara, CA. I am STRONGLY OPPOSED to this.

Both Le Conte and Tamarind streets are very narrow, and will not accommodate parking for dog owners' cars. In addition, the surface on these streets, especially Tamarind, is marginal and is patched continually. Additional traffic on this normally quiet street will cause more rapid deterioration and increased cost for maintenance, which San Mateo County can ill afford.

This is a quiet, peaceful neighborhood and numerous barking dogs and shouting owners in a concentrated area will be disruptive to everyone in the area, including those in the adjacent Farallon School. I don't believe it is right to construct fences and change the nature of an entire neighborhood for the sake of only the dog owners. This is supposed to be OPEN space for everyone, not fenced-in space for dog owners created artificially in a quiet residential area.

Rancho Corral de Tierra is a large space. Please find a more suitable location with adequate access and parking for this.

Corr. ID: 5736 **Organization:** Cabrillo Unified School District **Comment ID:** 364201 **Organization Type:** Unaffiliated Individual

Representative Quote: I am the Superintendent of the Cabrillo Unified School District and I have just learned of plans to construct an off-leash dog walk area adjacent to Farallone View Elementary School in Montara. The proposed location is adjacent to this school. The location is on a private road that is very narrow and is not suited for additional traffic or parking. In addition, locating off-leash dogs is problematic adjacent to an elementary school. Care needs to be taken to ensure dogs and their owners have no way of interacting with our students If the Park Service is to move forward, then I request a meeting to discuss how to mitigate our concerns.

Corr. ID: 6619 **Organization:** *Not Specified* **Comment ID:** 367261 **Organization Type:** Unaffiliated Individual

Representative Quote: Unfortunately, the Regulated Off-Leash Area (ROLA) suggested for Rancho (SEIS Alternative C) does not support the off-leash usage patterns similar to other GGNRA sites (e.g., Fort Funston or Crissy Field). The SEIS proposes a ROLA between Tamarind and LeConte in Montara that is too small for an off-leash hike. Over 80% of the perimeter of this ROLA is adjacent to Montara land, instead of Rancho land. Rancho maps from the Montara Dog Group for proposed off-leash areas were delivered to the NPS at an open house meeting during the original EIS comment period. it is unfortunate that the NPS failed to work seriously with local groups when determining the location and composition of the Rancho ROLA analyzed in the SEIS.

Response: The draft plan/SEIS presented the opportunity for a VSCA across from the elementary school under two action alternatives, but it was not part of the preferred alternative, and the school and local residents were opposed to this option as noted in the comment. This option has not been identified in the preferred alternative in the final plan/EIS for the same reasons.

CONCERN STATEMENT: (Concern ID: 53281) Commenters are concerned about the changes in dog walking restrictions at Rancho Corral de Tierra, stating that dog walkers in this area have a history of responsibly walking dogs both on leash and under voice control. Commenters assert that the majority of visitors at Rancho Corral de Tierra are residents of the surrounding communities, and these visitors value the current use of the area. Many commenters would like to have more options for walking their dogs at Rancho Corral de Tierra. Commenters included specific sites, including the trails at Vicente Ridge, the flat area between Farallone Avenue to the south and the horse ranch to the north, the trail that runs directly behind and around Farallone View School, and Moss Beach.

Representative Quote(s):

Corr. ID: 706 **Organization:** volunteer **Comment ID:** 352991 **Organization Type:** Unaffiliated Individual

Representative Quote: Rancho Corral de Tierra .

The lands above Seton hospital,all the way up above Park st, referred to as Vicente Ridge on NPS maps should be all be open for dog walking friendly trails.

The parcel consists of ranch roads multiple loops walking options are in existence.

Lines of sight are ample,leash enforcement is complimented by these trails being easily accessed from multiple locations by NPS service vehicles.

Corr. ID: 1199 **Organization:** *Not Specified* **Comment ID:** 351962 **Organization Type:** Unaffiliated Individual

Representative Quote: Please allow dog walking to continue throughout the entire Rancho Corral del Tierra property. There is a long history of sustainable and responsible dog walking in the area. Please do not ban dogs from most of the property when there has been no environmental damage requiring restrictive provisions on dog walking.

Corr. ID: 2490 **Organization:** *Not Specified* **Comment ID:** 405817 **Organization Type:** Unaffiliated Individual

Representative Quote: Concerning Rancho Corral De Tierra, where I live near Montara. For years and years the community has enjoyed this area as dog-accessible. Very few, if any, problems were reported before NPS took over.

Now NPS is in charge and the community of dog-owners (who are very close to the majority of Montara residents) are all but excluded. Not only that, but NPS is showing an aggressive attitude and the use of potentially lethal force again those dog walkers who dare to use the land in the fashion that they are accustomed to, and have be allowed to, for decades.

Corr. ID: 3783 **Organization:** *Not Specified* **Comment ID:** 359661 **Organization Type:** Unaffiliated Individual

Representative Quote: Since upland areas of the Rancho are dense chaparral and inaccessible due to poison oak except

by trail, the available area beyond the two fields for dog walking is limited to a few trails including those extending over the Montara Mountains through a variety of lands near the Field and the furthest reaches of the San Vicente Ridge trails above the Hayfield. It seems unreasonable to bar leashed dogs from this handful trails, as the SEIS identifies no major impacts from dog walking.

Corr. ID: 6356 Organization: Not Specified Comment ID: 365794 Organization Type: Unaffiliated Individual Representative Quote: I strongly advocate for Plan A, under which current dog walking practices would continue. There are very few places for dogs and their owners to enjoy public spaces together in the Bay Area and there is an historic precedent, for several decades, of homeowners and the general public walking their dogs at Rancho Corral de Tierra. I would especially argue for the flat area between Montara's Farallone Ave. to the south and the horse ranch to the north, just before the North Peak Access Road, to continue to be accessible to dogs, as this is the most-used area for local dog walkers and not as utilized by horses or mountain bikers.

Corr. ID: 6528 Organization: Not Specified Comment ID: 368836 Organization Type: Unaffiliated Individual Representative Quote: There are site-specific considerations that need to be included in the evaluation, and part of that is the pre-existing tradition of voice-command dog walking on the Rancho Corral de Tierra parcel.
-The GGNRA's goal of preserving and restoring the Rancho Corral de Tierra parcel CAN be accomplished even while permitting off-leash dog walking. Allowing off-leash dog walking would actually still be consistent with the fundamental values for which GGNRA was established. With a parcel the large size of Rancho Corral de Tierra, certainly the GGNRA can find SOME small area - even 0.01% of the size of the parcel - that could be used for off-leash dog walking. Please continue that tradition, and continue the existing management policies that would enable voice-command dog walking on Rancho Corral de Tierra.

Corr. ID: 6556 Organization: Not Specified Comment ID: 368852 Organization Type: Unaffiliated Individual Representative Quote: I am writing in expressing my desires that as much of the park land bordering Moss Beach and Montara be left as they were before the park came into existence. I would also like to point out an honest observation. First of all there are a lot of dog owners that walk their dogs in the Moss Beach - Montara area. Secondly, believe it or not, you are more likely to encounter a dog walker on these trails than any other kind of recreational user. Also dog walking is a legitimate form of recreation. Walking is healthy for the dog as well as the owner. It is my hope that dog walkers and ordinary visitors can co-exist peacefully on the trails of the GGNRA area of Moss Beach and Montara.
Please give the dogs as much area as you possibly can here.

Corr. ID: 6649 Organization: Not Specified Comment ID: 368239 Organization Type: Unaffiliated Individual Representative Quote: Regarding trails within Rancho please include in the trails maps the trail that runs directly behind and around Farallone View School and continues West parallel to 2nd street on the South side of the creek to connect at Kanoff Street. Also include where the same trail branches off at the Southwest corner behind the school, to connect with the end of 2nd and East Streets for residents access to Rancho across the drainage ditch.

Response: NPS considered allowing on-leash dog walking on additional trails through Rancho. Trails included an extension of the Farallone Trail, Deer Creek Trail, Alta Vista Trail, San Vicente Trail, and Etheldore Trail. Core habitat runs along the Alta Vista Trail and Deer Creek Trail and is not appropriate for dog walking. Most of the Etheldore trail is privately owned and therefore NPS cannot make the trail connection on the land. The San Vicente Trail has been included as an on-leash dog walking trail, as have the Almeria, San Carlos and Ranchette trails. NPS considered but dismissed off-leash dog walking on trails, with limited exceptions. Please see the final plan/EIS, chapter 2, Alternative Elements Eliminated from Further Consideration for more information.

CONCERN STATEMENT: (Concern ID: 53282) Many commenters prefer the no-action alternative; however, these commenters also suggested additional ROLAs in the following areas because these areas have been traditionally used as off-leash areas by visitors to Rancho Corral de Tierra or the area has been previously disturbed by trails, construction, and agriculture:

- Montara north
- El Granada
- West of Farallone View School
- Former "Hayfield" near Park Street adjoining Montara and Moss Beach parallel to Sunshine Valley Road

Representative Quote(s):

Corr. ID: 341 **Organization:** *Not Specified* **Comment ID:** 350626 **Organization Type:** Unaffiliated Individual
Representative Quote: ROLA - Montara from southern boundary up to San Pedro Mtn Rd. (x2 comments). Current ROLA too small. Off leash near Vicente Ridge Trail. (continued loop).

Corr. ID: 1443 **Organization:** Montara Dog Group **Comment ID:** 352565 **Organization Type:** Recreational Groups
Representative Quote: The Montara Dog Group's "preferred alternative" for Rancho is Alternative A, the "No Action" alternative, with the addition of two off-leash dog walking areas, one near Montara and the other near El Granada (See Attachment 2). Dogs would be allowed on-leash throughout the remainder of Rancho as indicated in Alternative A in the SETS (See Attachment 3). There is a fundamental error in the status quo assumed for GGNRA's No Action alternative in the SEIS. As acknowledged on page 60 of the SETS, there has been a long history of off-leash dog walking at Rancho, although not officially sanctioned. As such, off-leash dog walking should be the status quo or baseline for GGNRA's No Action alternative, not on-leash dog walking

Corr. ID: 2561 **Organization:** *Not Specified* **Comment ID:** 359087 **Organization Type:** Unaffiliated Individual
Representative Quote: Continued policies regarding Rancho Corral de Tierra makes land use more restrictive than use prior to GGNR acquisition and continues to negatively impact the residences of Montara and surrounding areas, along with their companion animals.

The No Action Alternative needs additional provisions to allow off-leash dog walking in the the areas near Montara and El Granada where the practice has been going on for decades.

Corr. ID: 3783 **Organization:** *Not Specified* **Comment ID:** 359637 **Organization Type:** Unaffiliated Individual
Representative Quote: If it is found to be impossible to normalize most of the present activities in the "Field" north of Montara near Farallone cutoff and Old San Pedro Mountain Rd, Farallone View School and Second St (multi-use, hiking with unrestricted dog walking, bicycle and equestrian access), then reasonable alternatives might be identified in the SEIS as the best way to improve compliance when implemented. One alternative location that was overlooked or rejected is the former "Hayfield" near Park Street adjoining Montara and Moss Beach parallel to Sunshine Valley Rd.

Corr. ID: 6574 **Organization:** *Not Specified* **Comment ID:** 369501 **Organization Type:** Unaffiliated Individual
Representative Quote: Our walks generally were confined to that portion of Rancho located north and west of Farallone View School. This parcel of Rancho is crossed by many trails and has been greatly altered by agricultural uses, construction of the Ocean Shore Railroad, San Pedro Mountain Road, and Highway 1, and most recently by CalTrans' construction of the "Montara Mosquito Ponds" as mitigation for its construction of the northern approach to the Lantos Tunnel. Within this area the terrain varies greatly from flat to fairly steep hills. The vegetation also varies from grassland and shrub to impenetrable thicket to stands of trees which tend force adherence to the trails. It is for these reasons I have recommended to you and your staff previously that this area be considered as one that dogs would be permitted off-leash. Within this area off-leash dogs can easily be contained from the suburban neighborhoods to the south and east, by fences and terrain from Highway 1 to the west, and by the trees and higher terrain to the north. There is enough variety of land and vegetation to allow bigger dogs to run and get the kind of exercise they require

Response: NPS considered a VSCA to provide off-leash dog walking within different areas in Rancho. The draft plan/SEIS presented the opportunity for a VSCA by the elementary school under two alternatives, but the school and surrounding residents were opposed to this option. A VSCA was also considered north of Farallone Elementary, but this area contains habitat for threatened and endangered species. A site west of Coral Reef in El Granada was also considered, but this site contains wetland plants, has seasonal standing water, and a high likelihood of threatened and endangered species. The 'fallow field' was also considered for a VSCA. This site contains California red-legged frogs; and, the property is on the Peninsula Open Space Trust (POST) lands. The Flat Top area was previously considered but dismissed as an alternative as well, due in part to the steepness of the access trail, and its potential for a future restoration site. GGNRA received many public comments on both the draft plan/SEIS and proposed rule requesting off leash areas in San Mateo county. GGNRA is generally unable to allow off leash on trails, as discussed in chapter 2 of the EIS, which leaves most areas in San Mateo county off limits to a voice and sight control area. Flat Top, an approximately 3 acre bowl, is one of the only remaining areas that would meet basic voice and sight control requirements (not a trail; area is already disturbed as a former quarry site; and, sensitive species have not been found in this area despite it being part of a broad critical habitat designation covering much of coastal California, and FWS consultation on this site as an off-leash area is occurring to confirm no adverse effects before off-leash dog use is allowed there). For these reasons, and in an effort to provide an off leash opportunity in San Mateo county in

regards to off-leash, GGNRA removed this alternative from considered but dismissed and into the final plan/EIS preferred alternative and final plan/EIS, with identification of possible parking restrictions for the county to consider.

CONCERN STATEMENT: (Concern ID: 53283) Several commenters expressed a desire for trails that form loops as opposed to dead end trails. One commenter stated that the Vicente Ridge area would be ideal for dog walking. Commenters expressed the need to spread users out at Rancho Corral de Tierra via looped trails.

Representative Quote(s):

Corr. ID: 348 **Organization:** *Not Specified* **Comment ID:** 350658 **Organization Type:** Unaffiliated Individual

Representative Quote: support 21-A Alternative A for Rancho Corral de Tierra.

The value of loop options is paramount in spreading out user groups.

Spreading out user groups is key to ensure a pleasant park experience for all including dog walkers.

Providing expansive dog walking within the Rancho will engage a valuable new segment of trails users in protecting these remote coastal lands.

Corr. ID: 506 **Organization:** *Not Specified* **Comment ID:** 351833 **Organization Type:** Unaffiliated Individual

Representative Quote: Comment specific to Rancho Corral de tierra.

Regarding the "Vicente Ridge" area.

This area would be perfectly appropriate for Dog walking.

The Looped trails are very desirable for spreading people out should seriously be considered for Dog walking

Response: NPS considered allowing on-leash dog walking on additional trails through Rancho. Trails included an extension of the Farallone Trail, Deer Creek Trail, Alta Vista Trail, San Vicente Trail, and Etheldore Trail. Core habitat runs along the Alta Vista Trail and Deer Creek Trail and is not appropriate for dog walking. The lower and upper San Vicente Trail has been included as an on-leash dog walking trail loop, as have the Almeria and San Carlos trails to complete a new loop as well as the Ranchette trail. Within the Rancho Master plan slotted to be begun by NPS in 2017, new trails may be designated and considered for on-leash dog walking by the Superintendent as part of that planning with the adjacent communities and the broader public.

CONCERN STATEMENT: (Concern ID: 53284) Commenters request that the NPS work with the community to create a dog walking plan that would benefit both the agency and the user community.

Representative Quote(s):

Corr. ID: 6547 **Organization:** *Not Specified* **Comment ID:** 368665 **Organization Type:** Unaffiliated Individual

Representative Quote: This COULD be done with the use of buffer zones or buffer times* that accommodate privacy and the local, historic values of your neighbors. My point: seek methods, places, and ways to accommodate the dog-walking community in ways that are expansive and protective of their interests. Ask them to embrace your plan and partner with you in regulating it. This would require your reconsidering your current "preferred alternative" - give us some room, opportunity, circumstance to allow voice-control walking. As a minimum, do this in places that operate voice-control historically (where you have indicated leash only on your maps)

A workable concept might be *buffer times, in which you allow voice-control dog walking within an hour or two of sunrise and sunset, thereby allowing a controlled opportunity for locals. I suggest this because it recognizes a basic respect for neighbors' burden and opportunity.

Corr. ID: 6623 **Organization:** *Not Specified* **Comment ID:** 367478 **Organization Type:** Unaffiliated Individual

Representative Quote: Before implementing onerous rules that restrict my ability to enjoy all of the trails in the Rancho with my well controlled dogs please at least consider working with the local community in deriving a science based approach to on and off leash dog use.

Response: NPS has engaged the public for their input throughout the extensive planning process, including dozens of public meetings, and over one year of sustained public comment during the NEPA process and rulemaking. See chapter 1 of the final plan/EIS, Advanced Notice of Proposed Rulemaking for details on the public comment period in 2002, for details of the GGNRA negotiated rulemaking process, for information on the scoping process and public participation during development of the draft plan/EIS and draft plan/SEIS, as well as public comment on the proposed rule. Public comments on the draft plan/EIS and draft plan/SEIS were analyzed and resulted in changes to the alternatives analyzed.

RB1400 - Rodeo Beach: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53285) Several commenters are concerned with the proposed area that will be

used for the ROLA at Rodeo Beach. These commenters feel that other visitors that prefer a dog-free experience should have more area to do so. One commenter suggested that the proposed fence around the west end of the lagoon be a double fence between the north and south sections of the Lagoon Loop Trail to ensure a dog-free experience.

Representative Quote(s):

Corr. ID: 4436 **Organization:** Not Specified **Comment ID:** 365259 **Organization Type:** Unaffiliated Individual

Representative Quote: By making Rodeo Beach completely off leash, you have changed the nature of the beach from general use to a special use zone. I do not support this and recommend you reduce the amount of off leash space to enable a wide variety of park users to continue to use the beach as they have in the past without having to accommodate dogs first.

Corr. ID: 6459 **Organization:** San Francisco League of Conservation Voters **Comment ID:** 368536 **Organization Type:** Unaffiliated Individual

Representative Quote: Rodeo Beach - we feel that many visitors who may desire a no-dog experience at Rodeo Beach will be disappointed. This is especially true of park visitors taking advantage of bus transit from San Francisco that only brings people as far as the Marin Headlands and Rodeo Beach. We appreciate the proposed improved access and no-dog status of South Rodeo Beach. We support the construction of the proposed fence around the west end of the lagoon, and propose a double fence to create a connection between the North and South sections of the Lagoon Loop Trail, to protect hikers from unwanted dog interactions.

Corr. ID: 6492 **Organization:** Nature in the City **Comment ID:** 367574 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe you should have left Rodeo Beach the way it was in the first EIS. Visitors who want a dog free experience should not have to go so far away for that. They already had to go most of the length of the beach, and now they must go even further.

Response: Following the public comment period for the draft plan/EIS, the size of the VSCA area was reduced to allow a no dog experience. In evaluating a suitable area for voice and sight control in Marin county, Rodeo Beach was identified as a suitable location given its size and ability to keep dogs away from sensitive resource areas, while other beaches in Marin county were deemed best suited for either on leash or no dogs (see for example chapter 2 of the final plan/EIS, rationale for Muir Beach and Stinson Beach). Fencing and natural vegetative barriers are also discussed in chapter 2 of the draft final plan/EIS. Installing a double fence at Rodeo Beach may impact wildlife movement; however, design solutions in sandy terrain will be evaluated and improvements made to further protect the lagoon on the western side between the bridge and its outlet to the ocean.

CONCERN STATEMENT: (Concern ID: 53286) Commenters suggested imposing time limits in the ROLA at Rodeo Beach to avoid conflicts between dogs and student groups.

Representative Quote(s):

Corr. ID: 3372 **Organization:** Not Specified **Comment ID:** 405818 **Organization Type:** Unaffiliated Individual

Representative Quote: The Marin Headlands is easy. Put an off leash time at Rodeo Beach. There are student groups there during the week. Off leash should be allowed until they would be going down, say 9:00 or 10:00. The only other change would be to allow dogs on leash on the Bobcat Trail so you could go from Fort Cronkite to the Alta trailhead.

Response: Time of use restrictions can be difficult to enforce and confusing to park visitors. Time of use has also been suggested for times when visitor numbers are low (early am or late pm), but these are generally the times when wildlife numbers are higher. Time of use is being used as a permit condition because permits can be more specifically managed and restricted if permit conditions are not met. This management concept and tool, though, will remain an option for dog management in future decision-making, including as an optional management response through the monitoring management program. Please see chapter 2, National Park Service Preferred Alternative and Alternative Elements Eliminated from Further Consideration for additional rationale for time of use restrictions.

CONCERN STATEMENT: (Concern ID: 53287) Commenters believe that dog walking should be permitted on the Cliff Trail north of Rodeo Beach.

Representative Quote(s):

Corr. ID: 5914 **Organization:** Yosemite Conservancy **Comment ID:** 364618 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm not sure of the distinction between off-leash under voice control and ROLA. They sound very similar, so I'll treat them as such. The present red status of Rodeo Beach (6-A) is fine with me and fellow dog owners. Your preference (6-F), changing the red area to yellow, seems okay, although the yellow ends before South

Rodeo Beach. Does colorless mean no designation, so off-leash is permissible? Similarly, the cliff trail to the north of Rodeo Beach that I walk with the dogs every morning - usually entirely on our own - has no color or text designation. I hope it remains that way.

Response: Dog walking on-leash will be permitted on the Coastal trail north of Rodeo beach to, and including the Old Bunker road loop; the Tennessee trail, a narrower cliffside trail which diverts off the Coastal trail will be a dog-free trail experience both to offer a diverse trail experience and for safety reasons.

SA1100 - Site Accessibility Issues

CONCERN STATEMENT: (Concern ID: 53414) Commenters expressed that the dog management plan does not provide suitable alternatives that allow accessibility for all users and visitors. Commenters noted that sand was difficult to walk in for some visitors, who needed paved paths to access areas. These commenters felt that the plan would limit the ability of visitors to recreate/exercise with their dogs. Other commenters noted that walking with dogs on-leash would limit the ability of some visitors to recreate with their dogs, as some visitors are not able to walk with their dogs on-leash. Commenters expressed more specific concerns with the accessibility of the preferred alternative at several sites, including Crissy Field, Fort Funston, Rodeo Beach, and Mori Point.

Representative Quote(s):

Corr. ID: 8 Organization: Not Specified Comment ID: 337962 Organization Type: Unaffiliated Individual
Representative Quote: My comment is on dog use plans for Mori Point.

Your current preferred draft plan (E/F) is unrealistic and potentially impedes use and comfort of visitors with limited mobility who do not have dogs. Here is why:

Mori Point has only one path that is accessible to human pedestrians with limited mobility and has any area defined for human comfort (i.e. benches to sit on). That is Old Mori trail and the pedestrian boardwalk by the ponds and protected habitat. The "limited mobility" group would include the elderly, parents of infants and toddlers transported in strollers, and anyone with a physical disability affecting their ability to walk up hills. It might also include many cyclists, as the hiking trails at Mori point are not suitable for cycling.

Some park users with limited mobility have dogs, but many do not. The only way for a dog walker to bypass Old Mori trail and/or the pedestrian boardwalk (where human users might rest to enjoy the natural scenery) is via Lishumasha trail and Upper Mori trail. The only plan that depicts that trail as being open to leashed dogs is Map 17-A (current usage) - - therefore, of the plans you have presented, that is the only one that will protect the interests of all current users.

Corr. ID: 39 Organization: Not Specified Comment ID: 338005 Organization Type: Unaffiliated Individual
Representative Quote: It is difficult enough for senior citizens to walk the sand, let alone with a leashed dog which thinks it's going to run and chase balls.

Corr. ID: 428 Organization: Not Specified Comment ID: 351355 Organization Type: Unaffiliated Individual
Representative Quote: Off-Leash Benefits

For the Two-Legged Companions:

- Access for the Elderly and Disabled- For some, walking a dog on leash is an impossibility. The availability of off-leash areas enables such people to have dogs and experience all of the benefits of dog ownership.

Corr. ID: 502 Organization: Not Specified Comment ID: 351819 Organization Type: Unaffiliated Individual
Representative Quote: My comments are restricted to the Crissy Field Area because that is where I go with my dog.

With the exception of the "no change" map/plan, no other alternatives adequately accommodate the elderly or people with disabilities to walk and exercise their dogs off-leash:

1. Exclusion from all hard services to walk dogs off-leash - - the path.
2. Lack of convenient parking to access permitted off-leash areas.

3 Distance to walk to gain access to off-leash area.

4. The inclusion of areas that are either grass or soft sand - - surfaces which are difficult/impossible for handicapped or elderly to walk on.

Corr. ID: 873 Organization: Not Specified Comment ID: 405844 Organization Type: Unaffiliated Individual
Representative Quote: As a disabled person with a companion dog, I really value the ability I have to take my dog to places like Chrissy Field and Fort Funston where he can run off leash. I have Spina Bifida and use leg braces and a cane, as a result it is very difficult for me to walk my dog on leash. The loss of access to such places would be a great blow to both of us, and severely limit our options for outdoor recreation in the city. I find it very hard to use the existing enclosed dog parks in the city, as the dogs there tend to be very territorial and aggressive. In the past I have been knocked over by these animals, and so I am forced to sit on a bench. My dog is protective and will then sit beside me and thus not take advantage of being off-leash. This is not a problem that occurs at more open spaces such as Chrissy Field and Fort Funston, where I am able to walk more freely and he can accompany me.

Corr. ID: 2008 Organization: Not Specified Comment ID: 354678 Organization Type: Unaffiliated Individual
Representative Quote: I like to walk at Fort Funston with my son and daughter-in-law and their two dogs, Pancho and Marisa. Because I have some problems walking, I can't get down the steep path to the beach. So we walk together around the trails in the upper area of Fort Funston. But if your preferred alternative goes into effect, the off-leash part of the upper area will be so small that we really won't be able to exercise the dogs there. And I won't be able to get down to the beach with my son and daughter-in-law.

I oppose your preferred alternative because it would prevent me from being able to spend time walking with my family. I'm sure this will also affect other people who are elderly or disabled.

Corr. ID: 2564 Organization: Not Specified Comment ID: 359090 Organization Type: Unaffiliated Individual
Representative Quote: Upper and Lower Mori Point:

1) PLEASE keep on leash dog access on Upper Mori trail to Sweeny Ridge: I have a back issue which prevents me from running and briskly walking up the steep upper Mori trail has a level of difficulty that I need to maintain my health and is one of the only exercises of this intensity that I can do with my back condition. Hiking these trails is so important to me that I purchased my house in Pacifica to live next to Mori point trail. These hikes have maintained my back health and helped reduce my high blood pressure and stress level. This is a wide trail with very few hikers - and those that I do encounter usually also have a dog. In urban areas, an important reason to conserve of open space is to provide residents like me a place to hike/exercise.

2) PLEASE keep on leash dog access on the wide but steep trails near Mori point: While my usual hike with my dog (on leash) is upper Mori trail to Sweeny Ridge, at times when it has been very rainy this trail is too muddy and slippery to use safely, so I then like to hike to Mori Point. This access is very important to my health as I have a back issue which prevents running but briskly hiking up bootlegger stairs and the upper trails of Mori provide me much needed exercise (only speed walking on the flat coastal trail next Mori point does not supply the same level of intensity).

Corr. ID: 3930 Organization: Not Specified Comment ID: 405843 Organization Type: Unaffiliated Individual
Representative Quote: For example insisting to have dogs on leash on the steep slopes of Funston, including the southern sand stairs. This will be extremely dangerous for the feeble, the elderly and any one else who finds traversing such terrain difficult-even without being jerked around by a dog who traverses the stairway with four feet instead of two. Adding a LEASHED dog in such an environment is not only extremely dangerous, it lacks common sense, Falling down stairs as a result of being jerked from a dog on a leash is not only dangerous to the dog owner but to other people on the sand stairs. A stairway that often is overcrowded with families including small children.

Corr. ID: 4403 Organization: Not Specified Comment ID: 364140 Organization Type: Unaffiliated Individual
Representative Quote: The NPS claims to be a champion of seniors and disabled. Your plans to make the asphalt trails, which BTW have not had the sand removed for a very long time, on leash only means that the many seniors who might be a bit unsteady, or use canes, a walker, a wheelchair - not to mention the families with strollers - will be unable to walk with their dogs at FF.

Corr. ID: 4851 Organization: Not Specified Comment ID: 361632 Organization Type: Unaffiliated Individual

Representative Quote: The needs of people with handicaps has not been addressed. Some of us can't walk dogs on leashes.

Corr. ID: 6580 **Organization:** *Not Specified* **Comment ID:** 369516 **Organization Type:** Unaffiliated Individual

Representative Quote: The GGNRA's "preferred alternative" is definitely not our preferred alternative.

It would greatly limit where Lucy and I could walk freely, together. I have walked so much on the sand, that I have actually injured my hip. It would be terrible if I could no longer walk freely with Lucy on the paths at Crissy, and had to be limited to the sand. I can't take her all the way to Ft. Funston and, even if I could, it's too dangerous for her because shes had two surgeries on her legs and the cliffs are difficult for her to navigate. I dont know what we'd do.

Corr. ID: 6681 **Organization:** *Not Specified* **Comment ID:** 405845 **Organization Type:** Unaffiliated Individual

Representative Quote: The proposed ROLO areas described in the SEIS are prejudicial to senior citizens and the disabled. It is very dangerous to attempt to navigate the paths to the beach with a dog on a leash in the event the owner falls/slips. The proposed ROLO areas will deny disabled people the ability to have their dogs off leash as much of the proposed ROLO areas will not be accessible as the dogs will not be within visual range of persons who must stay on the paved paths due to disability.

Response: The preferred alternative for some sites has been adjusted in order to provide more dog walking opportunities for visitors with disabilities. Changes include adjusting the upland VSCA to include an accessible, off-leash hardened surface at Ft. Funston and installing accessible beach mats where feasible and subject to the availability of funds. Additionally, there are accessible on-leash areas in the plan for disabled visitors who wish to visit the parks without encountering off-leash dogs, such as the newly-developed Coastal trail segment from the main parking lot to the water fountain at Fort Funston and a new ramp for beach access at Baker beach.

CONCERN STATEMENT: (Concern ID: 53415) Parking areas should have easy access to off-leash areas for those visitors who cannot walk farther distances. Commenters also expressed issues with parking accessibility or chosen areas for parking in the dog management plan, or ability to get to locations under the new plan.

Representative Quote(s):

Corr. ID: 350 **Organization:** *Not Specified* **Comment ID:** 350661 **Organization Type:** Unaffiliated Individual

Representative Quote: The off leash areas have to be somewhat close to parking for people who can not walk too far, and both open field and beach frontage should be included.

Corr. ID: 6135 **Organization:** Tamarind Street Resident **Comment ID:** 365585 **Organization Type:** Unaffiliated Individual

Representative Quote: The narrowness of Tamarind Street. The undeveloped street of Tamarind is very narrow and lacks sidewalks. Currently, cars often have to take turns passing through the narrowest part, because in places there is not room enough for two cars to pass. The street is not equipped to support more traffic and more parking.

Response: In response to public comments concerning site accessibility, some VSCAs were identified that support better access opportunities for elderly/handicapped visitors who wish to recreate in the park with their dogs. In addition, as funding allows, handicapped accessible beach mats may be installed where feasible.

CONCERN STATEMENT: (Concern ID: 57810) Commenters noted that the reduction in dog walking areas at Golden Gate National Recreation Area would require dog walkers to drive further distances to exercise dogs.

Representative Quote(s):

Corr. ID: 2635 **Organization:** *Not Specified* **Comment ID:** 356941 **Organization Type:** Unaffiliated Individual

Representative Quote: The only off-leash area in all of Marin County would be a remote stretch of Rodeo Beach, which is only accessible by car. Dog owners, who normally walk or drive a short distance to their trails, would be forced into cars to drive miles away in order to exercise their pets.

Corr. ID: 5221 **Organization:** *Not Specified* **Comment ID:** 362643 **Organization Type:** Unaffiliated Individual

Representative Quote: And, the Coastal Fire Road and Trail is the ONLY GGNRA trail from Muir Beach accessible to a person with a dog, and is therefor the ONLY option for people in Muir Beach to use without getting in a car and driving over the hill and out of area completely. Having to leave Muir Beach and get in to a car just to walk a dog is UNREASONABLE. Tam Valley doesn't need more cars, and neither does Mill Valley. Traffic is already a nightmare,

and leaving Muir Beach via car on a busy weekend is just not practical or wise.

Response: Dog walking opportunities are provided throughout the park's 21 areas. Exercise for both the visitor and their dog is available in those areas, at a minimum on-leash, and in eight areas, off-leash. Driving distances to park areas may increase in some instances, although the park's own outreach and survey to dog walkers did not clarify whether dog walkers would be displaced, many noting they did not know if they would change their dog walking location (please see chapter 4 for additional redistributional analysis). The park is not able to provide off-leash opportunities, for example, in all park areas, especially where an activity may threaten park resources, or increase user conflicts, two important objectives of this new park dog management plan.

SB1400 - Stinson Beach: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53288) Commenters believe that a ROLA should be established on a portion of the beach to accommodate dog owners and other visitors. One commenter suggested that the ROLA should be established at the north end of the beach, directly in front of the parking area.

Representative Quote(s):

Corr. ID: 967 **Organization:** Not Specified **Comment ID:** 354171 **Organization Type:** Unaffiliated Individual

Representative Quote: Stinson Beach - again, need area on the beach for voice control or regulated off-leash area. Need an additional alternative.

Corr. ID: 2433 **Organization:** Not Specified **Comment ID:** 358932 **Organization Type:** Unaffiliated Individual

Representative Quote: Stinson Beach: Map 2-F Yes/In Favor:

Comment: It shows the alternative for a dog corridor to the north end of the beach - - the corridor should be more generous. This corridor should be provided free of fear or harassment by park officials. It is a long standing solution at Stinson Beach with years of precedent. Dog owners willing comply and move to the north end of the beach. The map should include most of the area directly in front of that parking lot entrance at the north end as the dog corridor.

Response: A VSCA would not be established at Stinson Beach since dogs are prohibited on swimming beaches in the NPS and dog walking has historically not been allowed on the beach at Stinson, either by the NPS or previous land manager, California State Parks. However, the preferred alternative was modified to allow an on-leash dog walking path or corridor on the north end of the beach to give access to the adjacent county beach there- Upton Beach. Please see chapter 2, Preferred Alternative for Stinson Beach for additional rationale.

CONCERN STATEMENT: (Concern ID: 53289) Commenters support restricting dogs entirely from Stinson Beach, as it is a swimming beach. One commenter suggested that a barrier be constructed next to the Upton Beach access trail to keep dogs from entering Stinson Beach.

Representative Quote(s):

Corr. ID: 6323 **Organization:** Marin Audubon Society **Comment ID:** 365557 **Organization Type:** Unaffiliated Individual

Representative Quote: Stinson Beach

We continue to support Alternative D which complies with federal regulation that dogs not be allowed on swimming beaches. We question whether it is the responsibility of GGNRA, or any jurisdiction for that matter, to provide access to property owned by others. Should GGNRA continue to allow their land to be use to reach Upton Beach, an effective barrier should be constructed. The nature of this barrier should be more thoroughly discussed in this DSEIS. Whatever kind of barrier is used, it must be designed to not impede wildlife movement.

Corr. ID: 6408 **Organization:** Not Specified **Comment ID:** 366929 **Organization Type:** Unaffiliated Individual

Representative Quote: I strongly support prohibiting dogs in the picnic areas and parking lots at Stinson Beach (Alternative D) to remove the potential for conflicts between dogs and visitors and to provide visitors the opportunity to experience Stinson Beach without the presence of dogs.

Response: Dogs are prohibited on swimming beaches in the NPS. Dog walking has historically not been allowed on the beach at Stinson, either by the NPS or previous land manager, California State Parks. The preferred alternative was modified to allow an on-leash dog walking path or corridor from the northern most parking lot through and along the dunes at the north end of the beach to provide access to the adjacent county beach in the north called Upton Beach. This provides parking and a controlled access point that otherwise is difficult for visitors to Upton beach; and, a design solution will provide for controlled access to Upton along a defined path, helping to keep dogs from Stinson Beach proper.

CONCERN STATEMENT: (Concern ID: 53290) One commenter suggested restricting dogs to the northernmost picnic area

and leaving the middle and southernmost picnic areas free of dogs.

Representative Quote(s):

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 387928 **Organization Type:** Unaffiliated Individual

Representative Quote: If the NPS does not choose Alternative D, but instead chooses Alternative F, I hope that dogs would be restricted to the northernmost Picnic Area and that the southernmost and middle Picnic Areas would provide visitors the opportunity to picnic at Stinson Beach without the presence of dogs.

Response: As a swimming beach, dogs have historically and currently been prohibited by NPS on the beach, even on leash, for health and safety reasons. As the northern parking area is a main access point to Upton beach, the county beach, dog walking with 1-3 dogs will be allowed in the northern and central picnic areas but they must be on-leash to minimize conflict with visitors and to reduce the concern for health and safety issues associated with dogs in the picnic areas. The southern picnic area will be a dog free picnic area. Should the southern picnic area be unavailable due to flooding or other work, the central beach picnic area will be so designated a dog free picnic area during the interim. NPS will have the discretion to make such changes due to park resource, event, infrastructure work, or other management requirements.

SH1400 - Sutro Heights: Suggest Change in Alternative

CONCERN STATEMENT: (Concern ID: 53291) Commenters stated that on-leash dog walking should be allowed within the following areas at Sutro Heights Park: throughout the entire site, social trails in the southeast corner of the site, and near the parapet. Dog walking should also be limited to on-leash to protect wildlife in the area.

Representative Quote(s):

Corr. ID: 270 **Organization:** *Not Specified* **Comment ID:** 350394 **Organization Type:** Unaffiliated Individual

Representative Quote: I suggest that Sutro Park and Ocean Beach be entirely open to dog owners walking their own dogs, but restricted to on-leash only, everywhere and all year long. This would include the stretch of Ocean Beach currently protected for snowy plovers, since leashed dogs can be controlled at all times. This would also include the current off-leash areas of Ocean Beach, where I suggest this be changed to on-leash only with the following exception:

In the non-protected areas of Ocean Beach, and in Sutro Park, I suggest that dogs should be allowed off-leash IF (and only if) their owner can show physical evidence (ie the test certificate) of that dog having passed the AKC Canine Good Citizen Test, when asked by any park police officer.

Corr. ID: 529 **Organization:** *Not Specified* **Comment ID:** 351872 **Organization Type:** Unaffiliated Individual

Representative Quote: Sutro Heights Park

1. check accuracy of alt F map - area not shaded as on-leash near parapet - could be included as on-leash (not a formal garden)
2. Social trails (?) - SE corner - are there additional trails that should be considered designated? (G. Durgerian working with neighbors to improve trails)

Corr. ID: 3397 **Organization:** *Not Specified* **Comment ID:** 520322 **Organization Type:** Unaffiliated Individual

Representative Quote: I have been a GGNRA supporter for many years, and probably visit each of the parks at least once a year. I am also an avid birder. I visited the Sutro Baths last year when the vagrant river otter was there. I was shocked when I saw some visitors let their dog tromp along the waters edge, following the movements of the otter without regard to causing stress upon the terrain or the animal. My point is that I think with our increased density of recreational multi-use areas, we have to limit dogs, especially off lease. Dogs running wild can knock over the elderly and small children, they trash habitat for birds and small mammals.

Response: The preferred alternative allows only on-leash dog walking on the paths, parapet, and lawns at Sutro Heights. Social trails in general are not authorized trails, and therefore dog walking is not allowed on them as they create added impacts by creating new trail networks.

CONCERN STATEMENT: (Concern ID: 53292) Commenters stated that a ROLA should be established throughout Sutro Heights Park.

Representative Quote(s):

Corr. ID: 460 **Organization:** *Not Specified* **Comment ID:** 351398 **Organization Type:** Unaffiliated Individual

Representative Quote: Sutro Heights Park -

Please allow dogs off leash and on leash in all areas of this small park - this is a neighborhood park and is well maintained by the public neighbors - we need this area for neighborliness

Response: VSCAs would not be established at Sutro Heights Park. Historically this site has been designated as an on-leash

dog walking area, initially by NPS regulations and also by the 1979 Pet Policy. Please see chapter 2, Preferred Alternative for Sutro Heights Park for additional rationale

CONCERN STATEMENT: (Concern ID: 53293) Commenters stated that more no dog experiences should be provided within Sutro Heights Park.

Representative Quote(s):

Corr. ID: 6459 **Organization:** San Francisco League of Conservation Voters **Comment ID:** 368543 **Organization Type:** Unaffiliated Individual

Representative Quote: Sutro Heights Park - We continue to prefer seeing a greater accommodation to those visitors who would prefer a no dog experience, which here could include a number of people with physical challenges that would find it more difficult to visit other units of the GGNRA.

Response: Alternative D was not selected as the preferred alternative for Sutro Heights Park. The preferred alternative would allow only on-leash dog walking in areas except for the gardens where no dogs would be allowed. Please see chapter 2, Preferred Alternative for Sutro Heights Park for additional rationale.

TE2010 - Threatened and Endangered Species: Affected Environment

CONCERN STATEMENT: (Concern ID: 53417) Commenters questioned the presence of resources related to special status species in areas of the GGNRA. Commenters felt that special status species and habitat were not found in areas where dogs were allowed, and that dogs are kept under voice control along trails, limiting impacts. Commenters also noted other factors that may be currently influencing these species.

Representative Quote(s):

Corr. ID: 42 **Organization:** Not Specified **Comment ID:** 405846 **Organization Type:** Unaffiliated Individual

Representative Quote: I am responding to the policy to close the Oakwood Valley Trail to dogs under voice control and to require them to be on-leash. I am a steward of Oakwood Valley and I have walked my dog on the trail for the 37 years I have lived in Tam Valley. Problems have been extremely rare with dogs under voice control. There is no habitat damage when owners keep their dogs on the trails. Fragile habitat areas, such as that of the mission blue butterfly, are not on the valley floor where the fire road and trail are. Where habitat restoration and fragile areas do exist, fence and signage should take care of the problem.

Corr. ID: 510 **Organization:** Not Specified **Comment ID:** 351838 **Organization Type:** Unaffiliated Individual

Representative Quote: GGNRA DOG MANAGEMENT AT MUIR BEACH It seems that the salmon have not returned to the creek, at least not yet. I was told by a park employee that it was doubtful that the salmon would ever return because they had been gone so long and because the creek still dries up in the winter. In any case, people represent a much greater hazard to the salmon than dogs do.

Corr. ID: 1159 **Organization:** Not Specified **Comment ID:** 351798 **Organization Type:** Unaffiliated Individual

Representative Quote: The Ranger said they probably weren't snowy plovers since they are really hard to find and hiding out in the dunes. If I can't find them when I am looking for them, how is my leashed dog going to even have the opportunity to disturb them? If they are hiding out in the dunes, then just ban dogs from the dunes. I never see any dogs up there anyway (I do see lots of people hanging out on the dunes).

Corr. ID: 1389 **Organization:** Not Specified **Comment ID:** 352433 **Organization Type:** Unaffiliated Individual

Representative Quote: I have no problem changing the snowy plover beach to no dogs allowed. I do want to note, however, that I frequently see small children racing through this area, disturbing nesting areas and frightening birds. I also see this behavior on a regular basis on all the beaches and closed off sensitive areas. Parents need to educate their children that it is not OK to harass wildlife. I see this behavior far more in children while it is extremely unusual to see dogs chasing wildlife.

Corr. ID: 2786 **Organization:** Dog City Tours **Comment ID:** 405847 **Organization Type:** Unaffiliated Individual

Representative Quote: The claims regarding bird habitat & nesting (Snowy Plover, Bank Swallow, etc.) are inaccurate and have been repeatedly disputed. They are not based on scientific observation. Similarly, the impact of dogs on plant life has been exaggerated and not substantiated by any standard or scientific means.

Corr. ID: 6622 **Organization:** Not Specified **Comment ID:** 367476 **Organization Type:** Unaffiliated Individual

Representative Quote: Snowy Plovers? There is a lot of vacant coastline and how many dogs are dedicated bird

chasers anyway? Fishing and crabbing from shore doesn't drive these birds away also.

Corr. ID: 6637 **Organization:** *Not Specified* **Comment ID:** 367564 **Organization Type:** Unaffiliated Individual

Representative Quote: Lastly, the dogs have never been a threat to the bank swallows over these many years. I've been walking my dogs off leash at Ft. Funston for at least 20 years. I

ask why do the swallows return, year after year, despite the incursion of humans, dune buggies, horses, dogs, hang gliders, heavy equipment and attempts to alter their ecosystem.

Corr. ID: 6681 **Organization:** *Not Specified* **Comment ID:** 368265 **Organization Type:** Unaffiliated Individual

Representative Quote: The EIS/SEIS fails to establish that Lessingia ever populated Fort Funston. In fact, the EIS/SEIS relates to Lessingia previously having been located in the Lake Merced area (page 986) but admits that there is no documentation that Lessingia ever populated Fort Funston. There are numerous differences in the natural conditions between Lake Merced and Fort Funston and the EIS/SEIS fails to establish any basis for Lessingia ever having been present at Fort Funston.

Corr. ID: 6681 **Organization:** *Not Specified* **Comment ID:** 368263 **Organization Type:** Unaffiliated Individual

Representative Quote: Dogs are an insignificant issue related to the Bank Swallows (page 276). Currently the crows/ravens are a menace to any small bird in the Fort Funston vicinity. The EIS/ SEIS refers to a report by Black 1996 (page 325). Black's report predates the invasion of Fort Funston by the crows/ravens.

Corr. ID: 6687 **Organization:** *Not Specified* **Comment ID:** 369192 **Organization Type:** Unaffiliated Individual

Representative Quote: If you read the Affected Environment section carefully, you will learn that there are no plant species which are endangered or threatened on Federal or State registers that have designated "critical habitat" in the GGNRA. If we look at the ESA and the enabling legislation for the GGNRA, there is no reason to displace recreation to enhance the growth of any of these listed plants in the GGNRA. However, we see that GGNRA management has displaced recreational access to plant these plants with regularity, the most egregious location being Fort Funston.

Response: Special status species occur throughout the park. These areas are discussed in chapter 3 of the final plan/EIS. A central focus of the plan has been to relocate dog walking away from areas of core, contiguous habitat, and other areas with sensitive habitat and sensitive species. NPS acknowledges in the final plan/EIS that "dogs are viewed as a contributing factor to impacts associated with wildlife, and the total elimination of dogs in the park would not eliminate effects on wildlife, because visitors without dogs would continue to visit the park and use the trails/roads at GGNRA. Disturbance by all manner of visitors and any associated recreation equipment as well as by dogs has occurred and currently occurs in GGNRA as an existing condition." In recreational/park settings, domestic dogs and people are generally not mutually exclusive and it is therefore difficult to isolate the impacts and effects of dogs alone on wildlife.

However, visitors with dogs could impact natural resources to a greater extent than visitors without dogs. Even if direct harassment, injury, or death do not occur, wildlife can still be affected by dogs. The final plan/EIS states that dog presence at a site and on-leash dogs can disturb wildlife and/or cause a flight response through their presence on the beach or other habitats and by lunging/barking at roosting, resting, and feeding wildlife. For shorebirds (such as the western snowy plover), dogs could interrupt roosting or foraging, which causes the expenditure of energy; frequent disturbance of this type affects fat reserves needed for migration and breeding. Chronic disturbance during the nonbreeding season could indirectly affect breeding behavior. As stated in Sime (1999, 8.4): "If dogs chase or pursue wildlife, injuries to wildlife could be sustained directly or indirectly as a result of accidents that occur during the chase rather than direct contact with the dog. Injuries sustained may result in death or may compromise the animal's ability to carry on other necessary life functions resulting in eventual death, or reduced reproductive success. Even if dogs do not catch, but only chase birds and other wildlife, the modification of normal behaviors such as feeding, nesting, grooming, and resting can occur through repeated disturbance and wildlife may relocate from preferred habitat to other areas to avoid harassment, including the displacement of wildlife from public to private lands." It is also important to note that an alternative site may not necessarily be preferred habitat or suitable nearby habitat may not be available. The response of animals to predation risk is exactly the same as the response to disturbance; a species with suitable habitat nearby may avoid disturbance simply because there are alternative sites available (Gill et al. 2001, 266). By contrast, animals with no suitable habitat nearby will be forced to remain despite the disturbance, regardless of whether or not this will affect survival or reproductive success (Gill et al. 2001, 266). Please see chapter 4 of the final plan/EIS for a detailed summary of the existing credible scientific literature.

TE4000 - Threatened And Endangered Species: Impact Of Proposal And Alternatives

CONCERN STATEMENT: (Concern ID: 53419) Commenters felt that dogs disturbed and harassed special status species, were concerned about the impacts of dogs on special status species, and felt that protecting species and species habitat from dogs was important. Many commenters desired regulations that would support the protection of special status species; islands of species diversity such as the GGNRA are the best hope for the survival of what remains of the planet's rich and varied ecosystems.

Representative Quote(s):

Corr. ID: 165 Organization: Not Specified Comment ID: 349917 Organization Type: Unaffiliated Individual

Representative Quote: Natural areas need protection from dogs. There are plenty of accessible parks in the area already; protecting our beaches for endangered species like the Western Snowy Plover are crucial.

Corr. ID: 769 Organization: Not Specified Comment ID: 353256 Organization Type: Unaffiliated Individual

Representative Quote: The number of dogs running off leash in park areas continues to increase every year. I am an animal lover and I live with a small dog. I feel there are plenty of places to take a dog off leash and that we need to set aside park areas to help protect animals such as the Snowy Plover. Additionally, there is a Burrowing Owl atop the rocks at south Ocean Beach, just north of Fort Funston. Dogs pose the largest threat to birds and other wildlife. Dog owners who insist that, "My dog doesn't chase _____," are part of the problem. They believe they maintain control of their dogs while they are off leash, but evidence has shown time and again that dogs on the hunt will not respond to their owner's voices. A Burrowing Owl was killed in Berkeley last year, and it likely was the victim of an off-leash dog. Please consider that dogs should not be allowed in some sensitive wildlife habitats, and they should be required to be on a leash in other areas.

Corr. ID: 1025 Organization: Not Specified Comment ID: 351448 Organization Type: Unaffiliated Individual

Representative Quote: I am concerned that the Draft Management Plan does not adequately address the problems created by the rapid growth in dog walking within the GGNRA. This is particularly a problem at Ocean Beach where dogs interfere with the nesting Snowy Plover. Simply requiring dog owners to keep their dogs on leash will be ineffective without enforcement. Dog owners already routinely ignore leash requirements because of inadequate enforcement. Without increased enforcement they will also ignore leash requirements at the Snowy Plover habitat.

Corr. ID: 3426 Organization: Not Specified Comment ID: 359207 Organization Type: Unaffiliated Individual

Representative Quote: Please allow protections for endangered and threatened animals and plants where people, dogs/horses can not enter. There are ways to allow beaches to be shared without damaging the future of small defenseless birds whose limited energy is easily compromised by running/barking/sniffing dogs or jogging/walking people ... Certain areas must indeed to set aside to protect the animals who have no one feeding, walking, protecting them. PROTECT THE SNOWY PLOVERS.

Corr. ID: 5793 Organization: Not Specified Comment ID: 405848 Organization Type: Unaffiliated Individual

Representative Quote: As a CA Species of Special Concern, the NPS is well within its authority and is, frankly, duty-bound to afford the highest possible protection for the plovers. Not only will the plovers benefit from strictly limiting access for dogs, rare plants, amphibians, and microhabitats will benefit, too.

Response: The final plan/EIS includes several recorded instances of dogs disturbing and harassing special status species. Changes from the draft plan/EIS to the draft plan/SEIS and the final plan were made in part to provide better resource protection of special -status species.

Protection of natural resources, including threatened and endangered species, is an objective of the dog management plan, and areas where dogs are allowed and where they are prohibited was guided in part by these objectives. The final plan/EIS also includes the monitoring management program, which ensures continued protection of park resources. Please see chapter 2 in the final plan/EIS for more information on this program.

CONCERN STATEMENT: (Concern ID: 53420) Commenters questioned the impacts analysis of special status species and felt the studies used to support the impacts analysis were not sound. Many commenters suggested that the impacts of dogs were not as high as suggested in the analysis and in some cases believed that the presence of dogs may be beneficial to species.

Representative Quote(s):

Corr. ID: 289 **Organization:** *Not Specified* **Comment ID:** 350483 **Organization Type:** Unaffiliated Individual

Representative Quote: The whole explanation that dogs need to be banned or leashed to save some birds is a ridiculous canard. Over the last twenty years I've owned two, very active Australian Shepherds, and not once has either of them ever caught a bird. Perhaps, this has been overlooked, but you might note that they have wings and can fly. Catching a bird is unquestionably a very rare event that I cannot ever recall having seen. I would further note that these precious birds whose wellbeing evidently trumps the interest of every other living being have rest of the California coast enjoy, where days if not weeks no doubt go by between their being disturbed by a human, much less a dog.

Corr. ID: 550 **Organization:** Ocean Beach Dog Walkers **Comment ID:** 368320 **Organization Type:** Unaffiliated Individual

Representative Quote: There are no plant species which are endangered or threatened on Federal or State registers that have designated "critical habitat" in the GGNRA. Displacing recreation to enhance the growth of any of these listed plants is not required by the ESA and violates the enabling legislation for the GGNRA. However, we see that GGNRA management has displaced recreational access to plant these plants with regularity, the most egregious location being Fort Funston

Corr. ID: 1275 **Organization:** Ocean Beach Dog Walkers at Fort Funston **Comment ID:** 352223 **Organization Type:** Unaffiliated Individual

Representative Quote: There are no plant species which are endangered or threatened on Federal or State registers that have designated "critical habitat" in the GGNRA. Displacing recreation to enhance the growth of any of these listed plants is not required by the ESA and violates the enabling legislation for the GGNRA.

Corr. ID: 3100 **Organization:** *Not Specified* **Comment ID:** 357904 **Organization Type:** Unaffiliated Individual

Representative Quote: There is evidence in the scientific literature that off-leash dogs can have negative impacts on breeding and overwintering Western Snowy Plovers in other locations. However, nowhere in the SEIS is evidence provided that leashed dogs impact the Western Snowy Plover. Throughout the SEIS, the NPS cites a 2001 article by Lafferty to infer that on-leash dogs disturb plovers. The data in this article includes only two events of leashed dogs disturbing shorebirds and there is no evidence that these birds were plovers. This article actually states, "Leashing reduces both the probability that a dog disturbed birds and numbers of birds per disturbance." To use this as evidence that plover disturbance by leashed dogs is a problem is disingenuous.

Corr. ID: 4192 **Organization:** DogPAC of San Francisco **Comment ID:** 355964 **Organization Type:** Unaffiliated Individual

Representative Quote: If there were any peer reviewed, scientific studies that actually show the dogs are causing harm, I would support changes that would actually help the environment, unlike NPS's fencing off acres to the public which not only did NOT protect the bank swallows, it gave birds of prey posts on which to sit and pick off the birds. The birds that were not eaten, left.

Corr. ID: 6246 **Organization:** *Not Specified* **Comment ID:** 366196 **Organization Type:** Unaffiliated Individual

Representative Quote: Specifically regarding Fort Funston, per the SEIS there is just one native plant species that is federally endangered, the lessingia. The locations of this plant and damage to this plant by dogs is not documented in the SEIS. Substantially restricting dog-walking access in order to potentially protect a single plant species is an imbalanced response that places one plant above the recreating needs of SF residents. The vast majority of the upper Funston dunes and trails have been covered by non-native species since the military used this area decades ago. Contrary to the SEIS, these upper Funston dunes are not "denuded" but rather the ice-plant and other plants routinely rejuvenate, and the dunes shift with the weather over the paved trails.

Response: NPS disagrees with this comment and refers the reader to chapter 4 of the final plan/EIS for additional information. The impact analysis for special status species was based on peer-reviewed studies.

TE5000 - Threatened And Endangered Species: Cumulative Impacts

CONCERN STATEMENT: (Concern ID: 53421) Commenters noted that in the cumulative impacts analysis various projects are noted to restore mission blue butterfly habitat. Commenters stated that is unclear if these projects would be used to mitigate for impacts from dog walkers and if the additional mission blue butterfly habitat would be available for dog walking.

Representative Quote(s):

Corr. ID: 6323 **Organization:** Marin Audubon Society **Comment ID:** 376544 **Organization Type:** Unaffiliated

Individual

Representative Quote: Various actions are mentioned to benefit Mission Blue Butterfly: protecting habitat outside the Headlands and Fort Baker; several past projects, and "Additional acreage of mission blue butterfly habitat that will be restored under an agreement with the USFWS." The success of the two completed projects (1984 and 2007) is not stated, nor is it clear how they would offset or render negligible impacts from dog use. They could simply be providing more habitat for dogs to impact. Also, it is not clear what additional acreage would be restored, where and when, and whether or how these projects would minimize or offset impacts from continued and increased dog use. It is not demonstrated that the projects described would offset or mitigation the impacts of dogs on the species, but at least the impacts would largely be confined to the perimeter.

Response: One of the objectives of the dog management plan is to protect sensitive species and their habitat from detrimental effects of dog use. When selecting appropriate areas for dog walking, areas being restored or supporting mission blue butterfly habitat were avoided.

VR2010 - Vegetation and Riparian Areas: Affected Environment

CONCERN STATEMENT: (Concern ID: 53422) Commenters noted that areas within the GGNRA where dogs are allowed are often composed of areas of non-native or invasive vegetation, and are not impacted by dog use. Some commenters noted that plants are already adapted to dog use, and felt that if dogs were damaging vegetation it would be more apparent.

Representative Quote(s):

Corr. ID: 252 Organization: Not Specified Comment ID: 350357 Organization Type: Unaffiliated Individual

Representative Quote: Fort Funston is, and has been the pre eminent dog exercise area in the Bay Area. The dominant plant species there is Iceplant, and the dominant soil there is sand. The wildlife is birds, and none of these three is damaged or disturbed by off leash dog activities.

Corr. ID: 1035 Organization: Not Specified Comment ID: 351460 Organization Type: Unaffiliated Individual

Representative Quote: I understand that part of the concern is the impact on flora and fauna at the park. There are many areas in the park that are marked off for multiple reasons and access is blocked off. My experience has been that people are respectful of those boundaries. I suspect that the flora and fauna are doing just fine in those areas.

Corr. ID: 1643 Organization: Not Specified Comment ID: 353242 Organization Type: Unaffiliated Individual

Representative Quote: I have been around Funston for years. I just don't see dogs ruining the greenery like some suggest as an ecological concern.

Corr. ID: 1689 Organization: Not Specified Comment ID: 353631 Organization Type: Unaffiliated Individual

Representative Quote: In Marin County, different rules - a different philosophy - should apply; off-leash dogs are extremely unlikely to pose a substantive threat to the plants or animals which are already adapted both to a) the presence of dogs in the environment, and b) the relatively harsh conditions which exist specifically because the surrounding environment is a harsh one.

Corr. ID: 2820 Organization: Not Specified Comment ID: 357556 Organization Type: Unaffiliated Individual

Representative Quote: Dogs have been in the GGNRA - well - basically forever! But wildlife, plants, wild animals flourish in the park, if dogs were causing irreparable damage to the wilderness aspects of the park, would we not have seen effects by now?

Corr. ID: 5727 Organization: Not Specified Comment ID: 364190 Organization Type: Unaffiliated Individual

Representative Quote: I was particularly suprised to hear about some of these access-threatened locations, because there is very little wildlife in them to protect. Crissy field is a lawn, not wilderness. Fort Funston and Ocean Beach have no plant life. These restrictions feel very arbitrary in the public eye and do not seem to serve the greater good.

Response: Potential impacts to diverse types of vegetation have also been described in the draft plan/SEIS using the law enforcement (LE) data (includes leash law violations and warnings, citations, and pet waste removal violations) in combination with "best professional judgment of park staff, experts in the field, ongoing data collection for other projects, and other supporting literature (as cited in the text)." NPS observational evidence at GGNRA is also included and described by site, when available, and used in the impacts analysis. Data on frequency of disturbance of closed areas (specific habitat types, such as creeks, lagoons, and cliffs) in a particular park site, if available, have been incorporated with relevant scientific literature to predict the impact of dog management activities on vegetation. Where data on the frequency of disturbance are not available, information from park staff on the relative intensity of use by visitors and the relative number of dogs both on

and off leash as well as data on visitor use has been used to predict impacts.

Note that areas of non-native or invasive vegetation are targeted as part of a broader NPS policy and program to address the threat to park biodiversity and intended for eventual restoration where feasible. Dogs may serve as carriers of invasive species seeds, which increases such biodiversity threats in the park's ecosystems.

CONCERN STATEMENT: (Concern ID: 53423) Many commenters recounted experiences of dogs impacting vegetation, or noted that dogs have degraded natural areas of the GGNRA.

Representative Quote(s):

Corr. ID: 685 **Organization:** *Not Specified* **Comment ID:** 352942 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a volunteer with the Golden Gate Parks and work both at Crissy Field and in the Crissy Wildlife Protection Area (WPA). I've seen firsthand the problems of bad dog owners (the dogs are fine, it's the people, of course!) letting their dogs harass wildlife, tear up the ground, transmit invasive plant seeds and bother people.

Corr. ID: 796 **Organization:** *Not Specified* **Comment ID:** 353304 **Organization Type:** Unaffiliated Individual

Representative Quote: As wildflower photographers we see the effects of so many dogs on special wildflower areas and the plant life where these large numbers of dogs are allowed to run off leash off trail in GGNRA on daily basis. It seems that individual dog owners don't always see the cumulative effect of so many dogs in the Bay Area.

Corr. ID: 878 **Organization:** *Not Specified* **Comment ID:** 353544 **Organization Type:** Unaffiliated Individual

Representative Quote: Some dog owners are responsible for cleaning up their dog feces while others are not. The urine that dogs produce cannot be removed and produces foul odors that accumulate during the dry season. I believe that the buildup of nitrogenous wastes from dogs is harmful to the soil and the plants that grow within the GGNR. A number of these plants and the animals that depend on them are endemic to the area.

Corr. ID: 3332 **Organization:** *Not Specified* **Comment ID:** 358159 **Organization Type:** Unaffiliated Individual

Representative Quote: Sasha was always on a leash. That dog would obey every command I gave her, and would come when called, but I always left her on leash because the wildlife in the GGNRA was more important. In Sasha's later years we avoided Fort Funston; off-leash dogs have spoiled what was once a beautiful dunes habitat. Off-leash dogs are a menace at Crissy Field, Ocean Beach and a dozen other locations - - none of which I have been comfortable bringing my children to.

Please treat our parks, or lands, our flora and our fauna, and yes please treat our dogs, with respect, and ban all off-leash dogs in the GGNRA.

Corr. ID: 5137 **Organization:** *Not Specified* **Comment ID:** 362265 **Organization Type:** Unaffiliated Individual

Representative Quote: I watched over the course of a few years as more and more dogs trampled that huge coffeeberry into oblivion. The Park Service stood by and did nothing to save the plant or even to collect berries so the gene pool of that remarkable plant could be preserved. Too late now. Not only is that plant gone, so too are most of the shrubs that provided habitat around the Y grove, Battery Davis and the Skyline grove. The smaller shrubs were stomped down, the larger ones seem to have succumbed to the constant flow of dog urine inflicted upon them. The ground dwelling animals are gone too. Jackrabbits, California Quail and Spotted Towhees are all gone. It is likely they were chased to the point they could no longer reproduce, so either left for other places or just lived out their lives until their species were extirpated. I do not know the fate of the brush rabbits, but I haven't seen any in many years.

Corr. ID: 5476 **Organization:** *Not Specified* **Comment ID:** 363340 **Organization Type:** Unaffiliated Individual

Representative Quote: When I go to Fort Funston and see the denuded landscape north of the parking lot due to off leash dog activity, I have to wonder how the National Park Service is meeting it's legal requirement

All one has to do is look at the southeast corner of the site to see what the landscape should look like since few dogs run free in that area.

Response: As stated in the draft plan/SEIS, impacts to vegetation could occur as a result of disturbance by dogs through trampling, digging, or dog waste, and nutrient addition. The preferred alternative eliminates most dog walking off-leash on trails, reducing impacts off-trail to vegetation, and reduces dog walking in other than landscaped areas, which would likely reduce impacts to the vegetation. It is assumed that future management would be complied with, including leash control and

specific, enforceable guidelines for the proposed VSCAs where voice and sight control would be allowed. This will be monitored under the management and monitoring program and adjusted if need be to ensure native plants and other sensitive species are protected. It would also reduce physical disturbance by dogs in comparison to current off-leash use because owners would be in closer contact with their dogs and presumably would be more likely to comply with regulations.

VR4000 - Vegetation And Riparian Areas: Impact Of Proposal And Alternatives

CONCERN STATEMENT: (Concern ID: 53426) Commenters felt the impacts on vegetation from dogs stated in the draft plan/SEIS are small, particularly in light of other factors, such as human impacts, and that impacts were not well studied or quantified. Commenters felt the mention of poison oak as a species for protection from dogs was not appropriate given its negative impact on humans and dogs. Some commenters noted that in many areas natural factors would prevent dogs from leaving trail areas, resulting in almost no impacts on vegetation. In addition, commenters found the draft plan/SEIS to be biased against dogs as studies that showed minimal impacts from dogs such as the Bekoff and Meaney study were removed from the draft plan/SEIS.

Representative Quote(s):

Corr. ID: 360 Organization: Not Specified Comment ID: 351144 Organization Type: Unaffiliated Individual

Representative Quote: Im stunned that the SEIS makes a dramatic case about habitat destruction and the environmental impact of dogs within these parks, but fails to quantify that their impact is an extremely minor rounding error vs. other factors (including human impact) that are many orders of magnitude more significant.

Corr. ID: 435 Organization: Not Specified Comment ID: 351365 Organization Type: Unaffiliated Individual

Representative Quote: Comments specific to Pedro Point Headlands: Additionally, the vegetation is very dense on this site so it is almost impossible for dogs to wander off trail if not on leash (which they would be) on all the proposed trails thus they would have virtually no impact on vegetation and would have no access to the restoration areas which are very steep areas.

Corr. ID: 2567 Organization: Not Specified Comment ID: 359098 Organization Type: Unaffiliated Individual

Representative Quote: I also note in the latest draft of the plan that there are citations to publications that support the general theory that dogs can harm vegetation, yet I did not see an indication that the actual adverse impact of dogs off-leash in these specific parks has been quantified. This is disappointing since it seems to be used as a basis for action throughout much of the document.

Corr. ID: 2794 Organization: Not Specified Comment ID: 368783 Organization Type: Unaffiliated Individual

Representative Quote: Soils and Vegetation

SEIS spends a lot of space making the case that dogs damage soils and vegetation. Nowhere does SEIS attempt to quantify that damage, though they acknowledge that there are many other forces that alter soils and vegetation within the GGNRA. So, even though there is no evidence that the effect of dogs in the GGNRA is significant, SEIS devotes considerable pseudo-scientific effort to prove the effect exists. Discussed as follows:

2. SEIS, page 374, uses Shulzitski and Russell 2004 to say, heavy off-leash dog use increases deterioration of native plant communities.

Shulzitsky said this in his prestudy introduction to the unpublished version of the paper. He offered no evidence because he didn't study dogs or their impact on plant communities. Shulzitski 2004 is simply not a scientific citation about dogs and plant communities. Note that Shulzitski did not make the claim in the version of his paper submitted to a peer reviewed journal (Ecological Restoration Vol. 27, No. 4, 2009.) I conclude that he gave GGNRA what GGNRA wanted with this off-hand remark, but declined to make a statement to scientific peers for which he had no evidence.

Corr. ID: 4215 Organization: Not Specified Comment ID: 362219 Organization Type: Unaffiliated Individual

Representative Quote: I read the section of the report that discusses the impact of dogs on vegetation, which is offered as part of the explanation for reducing the number of areas where dogs would be allowed off leash. The section on page 15 of the introduction to the report relies on a number of old studies (dating to 1935), which state that breaking branches and bending limbs can be harmful to vegetation. I understand that off-leash dogs might cause such damage to vegetation, but the same would be true for deer, coyotes, and other large mammals. I know of other research that actually cites the beneficial effects of such interactions between large mammals and the surrounding vegetation.

To me, the most disappointing aspect of this section is that it makes no mention of the fact that the overwhelming majority of off-leash dog use in the GGNRA is on grown lawns and on beaches, where none of the cited problems can occur. The evidence offered does not in any way prove that a change in policy will reduce the number of broken branches in the GGNRA. By citing these studies in the way this report cites them, the NPS seems to be reaching far outside of any known impact of dogs in the GGNRA in order to make a case for very broad restrictions. I would prefer that the NPS rely on arguments that make a connection between the actual effects of dogs in the GGNRA and the policy recommendations.

Corr. ID: 4371 **Organization:** *Not Specified* **Comment ID:** 364122 **Organization Type:** Unaffiliated Individual
Representative Quote: The 2013 Environmental Impact Statement appears to be biased against dogs. Studies which have found minimal impact from dogs have been suppressed.

For example, in the GGNRA's own Draft Dog Management Plan/EIS of January 2011, it cites a study by Bekoff, M., and C.A. Meaney, saying "off-leash dogs generally travelled less than 6 to 15 feet off trail, for less than 1 to 2 minutes. They further noted that dogs traveling farther off trail were often lured there by the people responsible for them (throwing sticks, balls, or Frisbees, or going off trail and calling their dogs to follow)." The same study found that "off leash dogs generally did not travel far off-trail and rarely were observed to chase other dogs, disturb people, chase wildlife, destroy vegetation or enter bodies of water."

This study by Bekoff and Meaney is nowhere to be found in the 2013 DGMP/Supplemental EIS.

Corr. ID: 5584 **Organization:** *Not Specified* **Comment ID:** 363966 **Organization Type:** Unaffiliated Individual
Representative Quote: I take issue with a park plan for an urban park adjacent to a large population to put protection of poison oak (toxicodendron is its name) as a value above the people of the area. There is probably no human who would not have a negative reaction to this plant. It therefore is a danger for humans. For a plan to want to protect this toxic plant in this busy area of recreation for so many people is unconscionable. This plan reeks of a value system that needs revisiting. It seems the "native plant society" has too much control over this plan.

Response: Potential impacts to vegetation have been described in the draft plan/SEIS using the law enforcement (LE) data (includes leash law violations and warnings, citations, and pet waste removal violations) in combination with "best professional judgment of park staff, experts in the field, ongoing data collection for other projects, and other supporting literature (as cited in the text)." NPS observational evidence at GGNRA is also included and described by site, when available, and used in the impacts analysis. Data on frequency of disturbance of closed areas (specific habitat types, such as creeks, lagoons, and cliffs) in a particular park site, if available, have been incorporated with relevant scientific literature to predict the impact of dog management activities on vegetation. Where data on the frequency of disturbance are not available, information from park staff on the relative intensity of use by visitors and the relative number of dogs both on and off leash as well as data on visitor use has been used to predict impacts. NPS realizes that other park uses such as biking, hiking, beach driving, and special events (i.e. Fleet Week) create impacts to vegetation; however, impacts described in the final plan/EIS focus on impacts related to dog-walking. Existing conditions includes ongoing effects from other park uses. The potential disturbance from dogs to vegetation at GGNRA in the final plan/EIS was based upon the review and extrapolation of results from published and peer-reviewed studies. The Bekoff and Meaney studies were removed from the draft plan/SEIS because these studies were not peer reviewed.

CONCERN STATEMENT: (Concern ID: 53428) Commenters were concerned about the impacts of dogs and dog waste on vegetation, including in restoration areas, and invasive species introduction in the GGNRA. In addition, overcrowding dogs in smaller off-leash areas would cause a greater impact to vegetation in these areas. Some commenters noted that they would prefer to see no dogs in areas with fragile vegetation.

Representative Quote(s):

Corr. ID: 192 **Organization:** *Not Specified* **Comment ID:** 350076 **Organization Type:** Unaffiliated Individual
Representative Quote: I use the fire road on a weekly basis and STRONGLY BELIEVE THE DOGS NEED TO BE ON LEASH OR BANNED ALTOGETHER FOR THE FOLLOWING REASONS:

Dog walkers routinely walk 4 dogs who are rarely on leash. I see these dogs run wild disturbing hikers, families, bike riders, local wildlife (Rabbits,birds, etc.), digging/crush native vegetation, and defecating on the trail.

Corr. ID: 663 **Organization:** *Not Specified* **Comment ID:** 352856 **Organization Type:** Unaffiliated Individual
Representative Quote: Plants can also become affected by the presence of unmanaged dogs. Dog fur can carry seeds for great distances. This can bring in invasive species. When travelling with a dog across state lines, no one thinks to brush the animal for seeds. Keeping the dog in certain areas and controlled by the owner lowers the risk of the spread of invasive plants (Parks and Rec. of Oregon). Also, dogs cause excessive damage to the top soil and plants with behavioral digging or running. Sensitive plants and plants with shallow roots may become uprooted due to this form of damage.

Corr. ID: 988 **Organization:** San Francisco Resident and Crissy Field Dog Group **Comment ID:** 354360
Organization Type: Unaffiliated Individual
Representative Quote: I have walked my dog at Crissy Field for 9 years and think most dog walkers are responsible and considerate of the environment and fellow park users. I think the further reduction in designated dog access areas proposed in other options including the preferred Option F could result in overcrowding of dogs in designated areas and thus could possibly cause more impact to vegetation in those areas.

Corr. ID: 1245 **Organization:** *Not Specified* **Comment ID:** 352057 **Organization Type:** Unaffiliated Individual
Representative Quote: I worry about the environmental impact of poop on the trails and how those dogs affect other wildlife and plants in the area.

Corr. ID: 1787 **Organization:** *Not Specified* **Comment ID:** 353856 **Organization Type:** Unaffiliated Individual
Representative Quote: Being a Geologist (I know some information about environmental issues) there is no reason that the dogs should not be allowed. I understand that dogs trample the vegetation, however, if we were talking about the amount of area the dogs trample versus the entire area of the parks their destruction of vegetation is almost negligible. Our government has already ruined the natural vegetation by planting the non-native ice plant and the Pampas grasses thinking it would prevent erosion.

Corr. ID: 5631 **Organization:** Marin Conservation League **Comment ID:** 364035 **Organization Type:** Unaffiliated Individual
Representative Quote: We are fully aware of the potential for adverse effects of large numbers of dogs caused by trampling vegetation, depositing dog waste, and adding nutrients. Such degradation of high quality habitat can result in displacing wildlife from preferred habitats, with eventual loss of species from the area. For each of the seven sites in Marin, the Draft SEIS identifies sensitive species, habitats, and/or cultural resources that may be threatened by dogs and has recommended an appropriate response. Therefore, where a choice must be made between allowing dog access and protecting native wildlife, endangered species or sensitive vegetation, the Draft SEIS tips the balance toward protecting the resource.

Corr. ID: 6121 **Organization:** *Not Specified* **Comment ID:** 405849 **Organization Type:** Unaffiliated Individual
Representative Quote: If nothing else, give us more of Fort Funston for off-leash use. Reducing the available off-leash areas as much as you propose will mean more dogs in a smaller space, putting greater stress on the existing vegetation and soil, and likely producing an increase in dog feces per square foot. Most of us clean up, but not everyone does or will - with more dogs in less space, it won't be pretty.

Corr. ID: 6217 **Organization:** *Not Specified* **Comment ID:** 366134 **Organization Type:** Unaffiliated Individual
Representative Quote: A worthy undertaking, to try to manage the already excessive population in beaches and parks. They represent, by their numbers, a large and negative impact on plants and birds and non-dog toting humans.

Response: The preferred alternative provides some limits on dog walking access at the park, which would likely reduce dog waste and nutrient additions to the soil and vegetation. It is assumed that future management alternatives would be complied with, including leash control and specific, enforceable guidelines for the proposed VSCAs where voice and sight control would be allowed. This would help to reduce physical disturbance by dogs as well as dog waste and nutrient addition in comparison to current off-leash use because owners would be in closer contact with their dogs and presumably would be more likely to comply with regulations, including clean-up of dog waste. The draft plan/SEIS located VSCAs specifically in areas that have already been disturbed, are in areas with low wildlife activity, and are not located in habitat restoration areas. However, in response to this concern, in the more heavily used VSCAs, the concept of occasional closures to allow regrowth of vegetation has been added as an element common to all of the action alternatives. The draft plan/SEIS's monitoring-based management strategy will also monitor for impacts to resources, as well as visitors, to determine if additional mitigation

measures should be employed to reduce impacts to resources or visitors.

VU2010 - Visitor Use and Experience: Affected Environment

CONCERN STATEMENT: (Concern ID: 53430) Commenters noted their negative encounters with dogs while recreating at Golden Gate National Recreation Area. Dogs have jumped on, scratched, growled, and knocked over visitors. Dogs have also been seen chasing birds and other wildlife. A complaint among many commenters is the harsh reaction they receive when asking dog owners to leash their dogs. Commenters stated that dog owners often admonish other visitors when asked to leash their dogs, even when the dog owners are not abiding by the rules. Many commenters feel that dog owners are disrespectful of other visitors.

Representative Quote(s):

Corr. ID: 6 Organization: Not Specified Comment ID: 337958 Organization Type: Unaffiliated Individual

Representative Quote: At Ocean Beach, where I live, huge numbers of dogs run off leash in the on leash areas on a daily basis. Today (Friday) is a sunny day at the beach, and I can guarantee you that there will be DOZENS of dogs down there - - and their owners - - who will be violating the CURRENT regulations. The dogs crap all over the beach (and owners don't scoop), chase birds (including threatened species), jump up on people that want nothing to do with them (and have destroyed my headset for my iPhone on one occasion when a dog jumped up and clawed my chest), and generally create havoc. Many dog owners are responsible with their pets, but many are not. When I have (courteously) informed some dog owners that their dog was off leash in an on leash area, I have been physically threatened, verbally abused and harassed.

Corr. ID: 1153 Organization: Not Specified Comment ID: 351780 Organization Type: Unaffiliated Individual

Representative Quote: I regularly hike GGNRA trails around Tennessee Valley and Mill Valley. In the past year or so the increase in the number of people on the trails with dogs off leash is tremendous. I see 5 to 20 of them on almost every hike I take. All the trails I hike are either completely off limits to dogs or the dogs must be on a leash. I have pointed this out to dog owners many times, and not a single one has put their dog on the leash as a result of "learning" that their dog is required to be on a leash. Many times the owners feign ignorance or treat me as if I'm doing something wrong by pointing out their disregard of the regulations. I've called dog dispatch a few times, but they never seem to be available to come give out citations. If there isn't any way to enforce the current leash regulations then no dogs should be permitted on the trails at all.

Corr. ID: 3330 Organization: Not Specified Comment ID: 358157 Organization Type: Unaffiliated Individual

Representative Quote: As an avid devotee of the GGNRA trails and beaches, I can say without reservation that my dog and dog-owner encounters as a runner, hiker, biker, and beach comber are overwhelmingly negative. From getting rushed by dogs both on and off leash, invariably jumped on, scratched (to the point of bleeding), and having my clothes torn, my picnics absconded with, my little kids growled at and pounced, and my trail shoes more often than not besmirched with dog poop, I am awash in major dog vexation. The trails are sullied, the environs trampled, the wildlife and people barraged with bad behavior - - both canine and human - - and anyone enjoying the GGNRA must constantly remain on the defensive, lest an "Oh, he's really friendly" dog seemingly leap out of nowhere to rattle the quiescence and beauty of the trails.

Corr. ID: 4597 Organization: Not Specified Comment ID: 361124 Organization Type: Unaffiliated Individual

Representative Quote: I am a dog lover, dog, owner, and dog advocate, yet I feel that the dogs off leash at Fort Funston really interfere with the teaching program that is on-going between the SFUSD and the National Parks service. As a teacher, I was there on an overnight trip with my students. The proximity of the off leash area really interfered with our learning experience. We had some children who are extremely phobic. Many of the dog owners did not have command verbal of their pets. I believe there should be space for off-leash opportunities, but it should be limited to an area where educational goals are not being jeopardized.

Corr. ID: 5403 Organization: Not Specified Comment ID: 363162 Organization Type: Unaffiliated Individual

Representative Quote: There are a high percentage of non-compliant dog owners and professional dog walkers who provide false information or are rude and verbally abusive to the U.S. Park Officers. We are saddened to read about these incidents but not surprised based on our own experiences with non-compliant dog owners in the GGNRA.

Corr. ID: 5415 Organization: Not Specified Comment ID: 363185 Organization Type: Unaffiliated Individual

Representative Quote: Unfortunately, although there are many dog owners who respect the laws, there is a visible and

vocal minority of dog owners who do not respect laws or the rights of other citizens. These people ruin the park experience for all users - dog owners and non-dog owners alike. They give other dog owners a bad name, and honestly if all dog owners were respectful and aware of the needs of wildlife and other people, perhaps there would be less need for stringent dog laws. Unfortunately, too many of our San Francisco citizens will not respect these laws unless they are effectively enforced.

Corr. ID: 5885 Organization: Not Specified Comment ID: 364462 Organization Type: Unaffiliated Individual

Representative Quote: As a regular volunteer who not only enjoys working nearly 200 hours a year restoring and enhancing natural areas of the Presidio, I'm also a frequent user of the park, I inline skate, hike, bike and often simply sit in peace and quiet, watching and listening to the beauty around me.

All of the activities listed above, including the volunteering, have been disturbed, interrupted, and or threatened by unleashed domestic pets on countless occasions. While many poorly trained, leashed pets are just as bad, at least they are somewhat constrained.

Response: Commenters experiences explaining their negative encounters with dogs have been noted in both chapters 3 and 4, Visitor Use and Experience. The final plan/EIS addresses the responsibility of each dog walker for their dog or dogs as it relates to uninvited or unwanted interaction with other visitors as a citable violation.

CONCERN STATEMENT: (Concern ID: 53431) Commenters had concern about the manner in which data was presented in the draft plan/SEIS. Many commenters did not agree with the surveys used as a basis for determining impacts. For example, commenters did not feel that the visitor use surveys are representative of the use of the park and the 2002 Northern Arizona Study on dog walking was too general.

Representative Quote(s):

Corr. ID: 488 Organization: Not Specified Comment ID: 351777 Organization Type: Unaffiliated Individual

Representative Quote: Chapter 3 of the EIS Visitor Experience/Environmental Justice section

The document states: Some ethnic or low-income populations may be more negatively affected by off-leash dog walking that is a ridiculous and unscientific conclusion to reach from a random phone survey. They cite a roughly 7% difference in response between two income groups. Due to the uncontrolled nature of the informal survey that would be well within the error band; especially if there are very few respondents in any of the income groups. They also cite 11% o respondents thought the dogs discouraged use of GGNA by disadvantaged groups. Thats is a meaningless and highly subjective, speculative statement.

The document states:

Latinos expressed the most concern&For example, dog owners assume that other people will like the owners dogs as much as they do; dog owners let their dogs approach other people without first asking their permission; and owners do not react to their dogs begging for other peoples food.

That is a completely absurd generalization. I, and many dog owners I know simply do not do that.

This entire section of the document seems to me like NPS is grasping at straws and trying to link dog walking with negative affects on low-income groups, minorities and other disadvantaged groups. I find this tactic deplorable and highly offensive

Corr. ID: 4872 Organization: Not Specified Comment ID: 361662 Organization Type: Unaffiliated Individual

Representative Quote: The 2008 and 2012 visitors surveys, upon which it appears the SEIS conclusions are based, are inherently flawed, thus making any conclusions regarding both current and future visitor use erroneous. In San Francisco County, the 2008 survey was conducted at Crissy Field, Baker Beach, and Ocean beach for four days (two weekdays, two weekend days) and the 2011 survey was conducted at Fort Funston (two weekdays, two weekend days). This is not a representative sample of park use.

Corr. ID: 5227 Organization: Not Specified Comment ID: 405850 Organization Type: Unaffiliated Individual

Representative Quote: The NPS cites a very general survey of public opinion on restricting dogs at the GGNRA conducted in 2002 by Northern Arizona University as support for its Plan. In the survey, 53% o respondents stated that

they opposed allowing off-leash walking in GGNRA sites, while 40% were in favor. The survey is too general to be of use. The GGNRA spans 117 square miles and contains 24 defined sites with dog walking / off-leash dog walking.

Response: Several different surveys were used to corroborate visitor use along with NPS National Visitor Use statistics. These included an earlier regional survey in 2002 by Northern Arizona State University's Social Science Lab, as well as more recent research completed by SFSU in 2008-2010, and IEC studies in 2010 and 2011. Field staff observations were also used to supplement visitor data. While these surveys differed in methodologies, they generally provided a magnitude of levels of use for different park areas along with staff observations. They also provided a picture of issues and attitudes about dog walking in the park. Please see the final plan/EIS for additional information on individual studies.

CONCERN STATEMENT: (Concern ID: 53432) Many commenters enjoy seeing dogs running in the open areas of Golden Gate National Recreation Area. Commenters who gain pleasure from dogs at the park include dog owners and professional dog walkers, as well as many who do not own dogs. The commenters acknowledge that there are some irresponsible owners that do not watch their dogs, have unruly dogs, and don't pick up after their dogs; however, most dog owners are recognized as responsible for their dogs and respectful of other visitors.

Representative Quote(s):

Corr. ID: 1821 **Organization:** Not Specified **Comment ID:** 354147 **Organization Type:** Unaffiliated Individual

Representative Quote: What struck me was the relaxed atmosphere of the beach and its visitors that day and I think that this vibe could be attributed to the dogs being there. They broke down barriers and lead to strangers interacting with each other, chatting and enjoying a lovely afternoon. These interactions would not have happened if not for the dogs, who brought all together. It has been shown that dogs encourage people to exercise and improve quality of life.

Corr. ID: 3776 **Organization:** Not Specified **Comment ID:** 359499 **Organization Type:** Unaffiliated Individual

Representative Quote: As someone who is not a dog owner, it's something that brings me pride in where I live. It improves the experience of the city, and makes people more cohesive. People are more open to talking to dog owners and having those small interactions makes everyone's experience better!

Corr. ID: 5076 **Organization:** Sierra Club **Comment ID:** 362159 **Organization Type:** Unaffiliated Individual

Representative Quote: I do not usually walk with a dog, but do walk on Ocean Beach and Ft. Funston quite often. I find that dogs and their walkers are caring and responsible users of the GGNRA. I am happy to meet dogs and their owners. It just makes no sense to require dogs to be on a leash on a walk. It makes the walk worse for the human and the dog.

CONCERN STATEMENT: (Concern ID: 53434) Several commenters feel that dogs should be completely banned from certain areas or from Golden Gate National Recreation Area entirely.

Representative Quote(s):

Corr. ID: 1210 **Organization:** Not Specified **Comment ID:** 351985 **Organization Type:** Unaffiliated Individual

Representative Quote: I appreciate all you're doing to try to protect our environment. I feel dogs should not be off leash anywhere in the GGNRA. Voice command doesn't always stop a dog. I have been sprayed by wet dogs/ food on my blanket sniffed - not appreciated. Birds are chased by dogs and vegetation trampled. I don't want to go into GGNRA areas and have to worry about where/when dogs have defecated/urinated. I appreciate dogs being banned wherever possible from the GGNRA.

Corr. ID: 1332 **Organization:** Not Specified **Comment ID:** 352331 **Organization Type:** Unaffiliated Individual

Representative Quote: Please do not allow dogs in the National Parks. They are destructive to the environment and wildlife. They create an unwelcome and hostile atmosphere for human beings. On leash, off-leash it's all the same. I have not enjoyed any park experience in recent years due to the ever increasing dog population

Response: Comments were considered during revision of impact analysis. Please see chapter 4, Visitor Use and Experience for details. There are areas that will be dog free, including almost 2/3 of trail and coastal beach miles.

VU4000 - Visitor Use and Experience: Impact of Proposal and Alternatives on Visitors who Enjoy Dogs

CONCERN STATEMENT: (Concern ID: 53435) Restricting dog walking access will discourage people from engaging in outdoor activities, along with other users, on NPS land in San Mateo - activities that are traditional.

Representative Quote(s):

Corr. ID: 1439 **Organization:** San Mateo County Board of Supervisors **Comment ID:** 403964 **Organization Type:**

Unaffiliated Individual

Representative Quote: Throughout the process conducted to produce the Plan, I heard residents of San Mateo County ask not to have trail access and off-leash play areas for dog walkers reduced. By reducing the amount of trails people can access with their dogs and citing people for violations, GGNRA will be discouraging people from engaging in outdoor activities and enjoying their national park lands. For decades, dog walkers, non-dog walkers, mountain bikers and horseback riders have all enjoyed the trails and park areas that are now managed by GGNRA. Multiple user groups have been enjoying these areas together in the past and should be able to continue to do so.

Response: Please see the final plan/EIS, chapter 4, Visitor Use and Experience, for analysis regarding how various visitors may be affected by dog walking restrictions.

CONCERN STATEMENT: (Concern ID: 53436) Many commenters consider the proposed limits on off leash dog walking to be too restrictive. Many commenters state that they would choose not to visit Golden Gate National Recreation Area if their dogs were not permitted. Many people visit the park on a regular basis, even daily, to walk their dogs off leash. With greater restrictions, visitors would have to travel farther to exercise their dogs off leash, and these areas would be overcrowded and more degraded due to the increased use; the visitor experience would be lowered for these reasons. Other visitors claimed that they would be forced to walk their dogs off leash in restricted areas, as there are not enough natural areas to exercise their dogs. Overall, commenters are concerned about the loss of opportunities to recreate with their dogs in a natural, unconfined setting. There is also concern that limiting areas for dog walking, particularly off leash, would result in more dogs being surrendered to shelters and a drop in adoptions. Other commenters noted there would be negative impacts on traffic due to the need to drive to dog walking areas if nearby options are lost. Commenters also mention the impact on elderly dog owners who need to have off leash areas to properly exercise their dogs.

Representative Quote(s):

Corr. ID: 50 Organization: Not Specified Comment ID: 338020 Organization Type: Unaffiliated Individual

Representative Quote: I frequently walk my dog off-leash at Fort Funston, Ocean Beach, and Crissy Field. It is such a valuable asset to have places where my dog can run free, chase balls, swim in the ocean, and play with other dogs as she is unable to in her day-to-day environment. Dogs simply cannot get the same amount of exercise and movement when restricted to a leash and a weekend trip to these places tires her out more and makes her happier than anything else can. Yes, dog walking is inherently ripe for conflict, both with other dogs and people, but that is exactly why it is absolutely necessary to have wide, unrestricted, off-leash park areas. Overcrowding and restriction of dogs via leash actually increases their territoriality and increases conflict. The GGNRA sites are one of the very few places where space is abundant and the rate of conflict is probably relatively low compared to standard, fenced-in dog parks. As use of the parks goes up, increasing restrictions will only increase conflict and the necessity for park staff to enforce rules and intervene in conflicts.

Corr. ID: 204 Organization: Not Specified Comment ID: 350106 Organization Type: Unaffiliated Individual

Representative Quote: The idea that some of these alternatives provide "multiple visitor experiences" is simply not true. If I am a dog owner visitor, I cannot experience the beach, I have to walk on a paved path with bicyclists (and you know the bike coalition is just going to love that!) and pedestrians and have no view of the beach. Even though I live at the ocean, I have to walk my dog around the city streets, take her home, then go back out to the ocean if I want to enjoy it. That is simply ludicrous.

Corr. ID: 777 Organization: Not Specified Comment ID: 353270 Organization Type: Unaffiliated Individual

Representative Quote: It will be a disservice to a large population of tax payers who own dogs and use the GGNRA if off-leash areas are restricted or eliminated. To eliminate and/or severely restrict off-leash use of the GGNRA will force owners to have to secretly exercise their dogs in an area that has been off-leash for years. Dogs are a huge compliment to many families and exercising with your dog and family together is an immensely satisfying experience. The GGNRA is a beautiful asset to the Bay Area and should be able to be enjoyed by dog owners and their dogs in the same capacity that generations have experienced. Please keep the GGNRA open to off-leash in the same capacity that exists today.

Corr. ID: 1140 Organization: Not Specified Comment ID: 351694 Organization Type: Unaffiliated Individual

Representative Quote: I appreciate the work that NPS has put into this document, but feel the proposed changes are too restrictive towards dogs and their owners. My main comment is that the Draft Plan undervalues the role that dogs and the opportunities to walk them play in the public enjoyment of the GGNRA. A very high percentage of the users of many trails and areas in the GGNRA are walking their dogs. Without that opportunity, these people (not to mention

their dogs), would be stuck inside or on city streets.

Corr. ID: 1380 **Organization:** *Not Specified* **Comment ID:** 352420 **Organization Type:** Unaffiliated Individual

Representative Quote: I love to hike and spend time in nature. I do so with a well trained, well behaved dog. She is an important part of my connection to nature. I would stop using the San Francisco Bay area parks if I couldn't bring her with me. Further more, I would probably move out of the area all together.

Corr. ID: 2497 **Organization:** *Not Specified* **Comment ID:** 358998 **Organization Type:** Unaffiliated Individual

Representative Quote: I am very against this proposed dog management plan. I am a dog owner and also have been a dog walker for the past 10 years. This plan will affect the people that actually use and enjoy the parks on a DAILY bases. Reducing the areas where dogs are allowed are only going to consolidate the dog/people use areas and those areas will become overused and damaged.

Response: The EIS evaluated the impacts of restricting access to dog walking areas, including whether that would discourage people from engaging in outdoor activities, and the redistributive effects. Note that approximately 1/3 of all beach and trail miles will remain open to dog walking throughout the GGNRA. Please see chapter 4, Visitor Use and Experience for details.

CONCERN STATEMENT: (Concern ID: 53437) Several commenters expressed concern about park visitation if dogs are restricted from many areas. Because dog owners and dog walkers visit Golden Gate National Recreation Area regularly, there would likely be a void when the restrictions are put into place. Some commenters are concerned that undesirable people and behavior, such as accumulation of trash and visitation by vagrants, would increase.

Representative Quote(s):

Corr. ID: 3546 **Organization:** *Not Specified* **Comment ID:** 359176 **Organization Type:** Unaffiliated Individual

Representative Quote: You will see a HUGE drop in usage in those areas. It is not going to be something where suddenly people will show up because dogs are not around. It will be empty land.

Corr. ID: 6136 **Organization:** *Not Specified* **Comment ID:** 405851 **Organization Type:** Unaffiliated Individual

Representative Quote: The parks in our city are important to we who pay the bills (taxes), it is how we have our downtime, and if you tell me certain members of my family are no longer welcome, ie my dog, we will stop going and our parks will go unappreciated and could fall into the hands of droves of vagrant's encampments, trash, human feces, illegal activity, and even more used needles.

Response: The final plan/EIS proposes to restrict dog walking in some areas, but substantial areas of the park remain accessible to dog walking, including approximately 1/3 of all beach and trail miles. The park is also proposing additional law enforcement and monitoring, which could also help deter undesirable behaviors. Regarding the potential for dog walkers to no longer visit GGNRA regularly, a dog walking redistribution survey was developed, completed, analyzed, and incorporated into the impact analysis. This survey found that many dog walkers are unsure if they would go elsewhere. Please see chapter 4 of the final plan/EIS for more details. Park areas may also receive added visitation by non-dog walkers who might return to these areas and serve as a replacement in deterring increased, undesirable social behaviors.

CONCERN STATEMENT: (Concern ID: 53438) Commenters expressed a desire to have designated on and off leash areas for dog owners, stating that dogs should have off leash areas but that certain areas are not appropriate for such recreation.

Representative Quote(s):

Corr. ID: 111 **Organization:** *Not Specified* **Comment ID:** 345828 **Organization Type:** Unaffiliated Individual

Representative Quote: People who support these rules are not dog haters. I often enjoy the company and energy of dogs but not all the time. Dedicating locations for off leash, on leash, and dog free zones gives us the opportunity to experience the park on our terms and not the terms of just one group of people. Again, I reiterate, you need to provide off leash areas for these folks.

Corr. ID: 278 **Organization:** SFUSD **Comment ID:** 350457 **Organization Type:** Unaffiliated Individual

Representative Quote: I love dogs so much!!!

But, I do feel that there needs to be some sort of 'accountability' for dog walkers who walk dogs off-leash.

For instance, I work as the teacher on special assignment with the SFUSD Environmental Science Center at Fort Funston.

Our site at Fort Funston is beloved, and has served SFUSD for ~40 years. The site works well to provide SFUSD's underserved population a no-cost overnight to experience the joys of nature.

During my first year as TSA for this site, it has been interesting to see the massive dog walking population at the site. When I am not with the students, I often go up to chat, and pet the dogs, and truly appreciate that there is a majestic space where dogs can get their mental and physical stimulation in 'play dates' with other dogs.

yet, I do believe that these spaces are shared space, and there needs to be a heightened sense of responsibility with some of the dog walkers. the students we work with often see countless plastic dog poop bags littering the trails, and dogs trampling through the native restored areas, which is one of the primary areas we work with our students.

while I do value off leash areas, I do see that these areas are not taken care of and respected, and dog owners need to be accountable to clean up after themselves. I don't know what the solution is to this, but just wanted to provide commentary on this.

Response: The preferred alternative does in fact designate on and off-leash areas in addition to areas where no dogs would be allowed.

CONCERN STATEMENT: (Concern ID: 56080) Comments and quotes from visitors who do not enjoy dogs are exaggerated to portray more significant issues than actually exist. In addition, comments and quotes from visitors who enjoy dogs are used significantly less throughout the draft plan/SEIS.

Representative Quote(s):

Corr. ID: 6716 **Organization:** San Francisco Dog Owners Group **Comment ID:** 499774 **Organization Type:** Unaffiliated Individual

Representative Quote: Throughout the SEIS, extensive quotes from people who view dogs as a problem or who do not want dogs in GGNRA are included. Comparatively fewer quotes from dog walkers are included, giving the impression of serious problems with dogs in the GGNRA. Comments where people report a single disturbance or problem with dogs are considered illustrative of those larger problems, while comments from dog walkers that they have not seen those same problems in decades-long experiences in the GGNRA are dismissed and not included. There continues to be an underlying assumption throughout the SEIS that dogs are bad that they have negative impacts on nearly everything - plants, wildlife, safety, other visitors, etc. - even though the SEIS has no site-specific studies showing any of those negative impacts are actually occurring in the GGNRA.

Response: In analyzing the impacts of dog walking on visitor experience, human health and safety, and park resources, the EIS does utilize surveys, studies, and actual public comments submitted during the dog management planning process, which NPS believes reflect the range of opinions surrounding dog walking and visitor use and experience. Dog walkers are estimated to make up approximately 10-12% of all visitors to GGNRA, whereas most commenters on the plan are dog walkers, not the other 88-90% of non-dog walking visitors. While it would be virtually impossible to survey every visitor to obtain the exact percentage representation of opinions regarding dog walking, GGNRA has conducted various surveys. For example, a regional survey was conducted in 2002 which indicated that many visitors did not support off-leash use. And regardless of opinions on the issue, NPS is still required to follow the resource protection mandates placed on it by Congress. Accordingly, the number of comments submitted on any particular topic does not determine level of impacts.

CONCERN STATEMENT: (Concern ID: 56081) Fences are proposed within the Preferred Alternative at some sites. Impacts to visitor use and experience from fences is not analyzed. Fencing is ugly and will make visitors feel unwanted.

Representative Quote(s):

Corr. ID: 6716 **Organization:** San Francisco Dog Owners Group **Comment ID:** 499776 **Organization Type:** Unaffiliated Individual

Representative Quote: THE SEIS INCLUDES FENCES AS A MANAGEMENT STRATEGY WITHOUT ADEQUATELY CONSIDERING THEIR IMPACTS

The SEIS suggests fences be erected around off-leash areas to clearly delineate where dogs can be let off leash so that people who don't want to interact with a dog can know where not to go. During Negotiated Rulemaking, GGNRA staff, including then-Superintendent Brian O'Neill, consistently and adamantly refused to consider fences, despite pressure to do so by those who do not want dog walking in the GGNRA. At the time, GGNRA staff argued that fences were ugly and no one wants to see fences in the park. Fences were not included in the DEIS, and there is no adequate explanation for why they were added to the SEIS. Fences are ugly, and serve to make those penned inside feel unwanted. Fences

secure enough to keep small dogs inside will hinder movement of wildlife. Fences are a bad idea. There is no analysis of impacts of fences on the visitor experience in the SEIS, especially the visitor experience of people who walk with dogs. This analysis should have been included in the SEIS. Because of this inadequate analysis of fences, the SEIS and the Dog management Plan it supports cannot be accepted.

Response: The preferred alternative for Oakwood Valley was modified; the VSCA on the Oakwood Valley Fire Road was removed and replaced with on-leash dog walking. Therefore, no fencing would be installed at the site. Please see chapter 2, Preferred Alternative for Oakwood Valley for more details and Elements Considered but Dismissed regarding establishing VSCAs on trails. However, fencing and other landscape design solutions will be used to demarcate off-leash areas from other areas for safety and clarity of uses. Fencing impacts are analyzed in chapter 4, Visitor Use and Experience.

VU4005 - Visitor Use and Experience: Impact of Proposal and Alternatives on Visitors who Do Not Enjoy Dogs

CONCERN STATEMENT: (Concern ID: 53439) Many commenters are supportive of the plan approach to provide dogs with off-leash areas, as well as areas where dogs are prohibited. Commenters feel that dogs and dog owners should have adequate space to recreate and dogs should be able to enjoy the park; however, commenters also feel that following leash laws is imperative for the safety and enjoyment of all visitors, especially children. Restricting dogs will also benefit natural and cultural resources.

Representative Quote(s):

Corr. ID: 5 Organization: Not Specified Comment ID: 405852 Organization Type: Unaffiliated Individual

Representative Quote: I would like to voice my support for Crissy Field maps 10f and 10c. These two maps achieve two important objectives: 1. It leaves a large area where dogs can run around off leash (ROLA) on both the field AND a long stretch of beach. Dog walkers should be able to enjoy sizable areas of the beach and field as ROLA. 2. It preserves East Beach for a place for young children and families free of dogs. East Beach is the most used area of Crissy field. My own daughter was run over and left with a bloody nose by a dog chasing a ball. Her twin sister had stepped in dog feces that same trip. The fact is that part of the beach is too heavily impacted as it is. Removing the dogs and creating a safe stretch of beach free of dogs is a fair thing to do for families.

Corr. ID: 101 Organization: Not Specified Comment ID: 339936 Organization Type: Unaffiliated Individual

Representative Quote: I support the National Park Service in restricting several new spots in Golden Gate Park to dog use. Our precious common parks are not home to just wealthy dog walkers, but to quiet citizens who do not wish to be bothered by annoying and potentially dangerous dogs (or their owners); not to mention the many other living organisms that make up that ecosystem and without which no one would want to visit GGP in the first place.

I urge the National Park Service to go ahead with restricting dogs from being off-leash in designated areas, and to disallow dogs altogether in ecologically sensitive territories.

Corr. ID: 1003 Organization: Not Specified Comment ID: 351402 Organization Type: Unaffiliated Individual

Representative Quote: I strongly AGREE with the NPS proposal to further limit off leash dogs and areas where dogs are allowed. It is too bad that dogs spread diseases, such as the recently reported outbreak of distemper in the Tam Valley neighborhood, and are generally hard on the environment. It is high time that the National Parks started to defend the habitat within their boundaries, as the last remaining homes of many of our native species. The purpose of these parks is to preserve our natural places for future generations and these proposals are right in line with doing that. As our area has grown, we have decimated habitats throughout Marin, causing the disappearance of many of our native animal and plant species. As a long time resident of Tam Valley, I am appalled and saddened by this. Dog owners are a passionate group who love their dogs as family members and don't get it that dogs cause harm to the environment, especially off leash. I have seen all kinds of dog mischief out on Oak Valley trail and fire road, as well as Muir Beach. This includes digging, chasing animals and running through posted streams. Some owners are good about cleaning up after their dogs, but others think that dog poop is biodegradable and so it is "OK" to leave or throw into the creek, with or without bags. They don't realize that not only diseases, but parasites and medications are spread throughout the environment every time a dog leaves poop behind. Not only that, but the scent will linger and encourage other dogs to mark the same area.

I know it is a difficult decision to stand by, especially under the organized onslaught by dog owners, but PLEASE stand your ground. Once this is in place, dog owners will just have to find or create other alternatives for their pets that won't destroy the public lands and their delicate environs. Thank you!

Corr. ID: 4084 Organization: Not Specified Comment ID: 361260 Organization Type: Unaffiliated Individual

Representative Quote: Please do not allow unleashed dogs on Muir Beach. I went there less and less over the years as it became so widely known as a dog park, until I stopped going altogether. But recently I (a San Rafael native) have been making tentatively forays back to that area, enjoying immensely such things as the newly redone Dias Ridge Trail, the "secret garden" at the Zen Center and taking the Middle Green Gulch Trail from there, and the stunning Muir Woods and Muir Beach Overlook, and also, I went to Muir Beach itself while it was closed for restoration work and learned again why it's a such a gem. There is no reason that it should only be enjoyed by people who like unknown wet dogs bounding up to them and their tots (not to mention the effects of dogs on the habitat/wildlife). I know other people like myself who have stopped going there because it is overrun with dogs. Please, please, please, I am begging you, no unleashed dogs at Muir Beach. It's gorgeous, and I have a right to go there without fear of loose dogs.

Corr. ID: 4118 **Organization:** *Not Specified* **Comment ID:** 362043 **Organization Type:** Unaffiliated Individual

Representative Quote: The GGNRA provides a huge variety of visitor experiences, and well-regulated dog use should be one of them. Right now, the overwhelming presence of dogs on some beaches is effectively excluding any other use, creating a significant imbalance in user experiences. The marginal benefits of uncontrolled dog use, versus on leash, for the dog users is far less than the major degradation of benefits to the non-dog users, caused by the wide-ranging impacts of the uncontrolled dogs.

Response: The final plan/EIS provides for a variety of visitor experiences, including on and off-leash dog walking and dog free experiences that preserve and protect park resources and values for future generations.

CONCERN STATEMENT: (Concern ID: 53440) Many commenters are concerned with the disregard of the rules by dog owners and dog walkers. These commenters feel that they cannot recreate in the park as they wish because dogs dominate the beaches and trails and dictate other visitors' behaviors. Some commenters stated that they are scared of dogs and feel that allowing dogs in the park limits access to these areas. Because dog owners neglect to follow the rules put in place by the NPS, the natural resources of the park suffer and visitor experience is degraded for these commenters. Several commenters would like to see stricter leash laws for the safety of park visitors.

Representative Quote(s):

Corr. ID: 2002 **Organization:** *Not Specified* **Comment ID:** 354374 **Organization Type:** Unaffiliated Individual

Representative Quote: As a dog owner, I am all for more laws that keep dogs on leash. On more than one occasion in more than one park , I have been jumped on , knocked over and snapped at by off leash dogs. At each of these incidents I was told their dog just wants to play, or that the dog is friendly. The truth is that nothing would have occurred if their friendly playful dog been on leash. I would not have been knocked down , jumped on, or snapped at because the owner of the dog would have had control of the dog on a leash. I hope to be able to enjoy the parks with my dog on leash, knowing that other dogs will be on a leash also.

Corr. ID: 2004 **Organization:** *Not Specified* **Comment ID:** 354673 **Organization Type:** Unaffiliated Individual

Representative Quote: In general, dogs running wild off-leash enjoying their freedom by default means that others occupying these areas do not have the freedom to enjoy them without the influence of the dogs. If dogs are on the beach without a leash, whether or not in "voice control," the beach seems to be effectively ceded to be a dog beach, particularly with no definition of voice control and no enforcement of what rules exist at present. Those who might want to enjoy the beauty and serenity of the open space are consequently prevented from doing so.

Corr. ID: 2558 **Organization:** *Not Specified* **Comment ID:** 359083 **Organization Type:** Unaffiliated Individual

Representative Quote: Golden Gate National Recreation Area was set up to be a RECREATION AREA for a densely populated, urban area. These trails and beaches have been abused by dog walkers who think they have the right to let their dogs run free over the rights of people who would like to use these public areas. I do not like strange dogs of varies sizes running up, jumping on, sniffing me. On one occasion a dog stole a sandwich from my young son, I have seen children playing soccer step in dog poop bc many dog owners are irresponsible. Because of this, please enforce new rules that will make all public areas safe for more than just dog owners and their dogs.. I do not support off-leash areas .

Corr. ID: 4780 **Organization:** *Not Specified* **Comment ID:** 361513 **Organization Type:** Unaffiliated Individual

Representative Quote: As it is, I regularly see dog owners violating existing restrictions, letting their dogs off leash on trails where this is forbidden, and bringing their dogs into areas where they are not supposed to be, leashed or otherwise. These dogs then run off the trails and deep into the surrounding hillsides, disturbing any possibility of sanctuary for the wild animals who live there, and when on the beaches, relentlessly chase any shorebirds that are

present, making it impossible for them to rest or forage for food.

Corr. ID: 5775 Organization: Not Specified Comment ID: 364283 Organization Type: Unaffiliated Individual

Representative Quote: I own a Greyhound that must be kept on-leash at all times unless in an enclosed area, due to his propensity for wandering. It's frustrating to responsible walk him on on-leash trails and come into contact with off-leash dogs and their irresponsible owners. More enforcement of these on-leash areas really is necessary to teach people that the rules DO apply and they must follow them. Without proper enforcement, people will constantly let their dogs off-leash and nothing will really change from the past.

Corr. ID: 6459 Organization: San Francisco League of Conservation Voters **Comment ID: 368528 Organization Type:** Unaffiliated Individual

Representative Quote: There was an agreement by all parties in the Neg-Reg process that park visitors who desired to have a no dog experience of the park should be able to do so conveniently. It is our belief that the preferred alternative does not meet this goal in all areas, particularly in the portions of the park within San Francisco. We would encourage further examination and expansion of opportunities for those people desiring an experience of the richness of this park without encountering canines to be able to do so.

Corr. ID: 6678 Organization: Wild Equity Institute **Comment ID: 369615 Organization Type:** Non-Governmental

Representative Quote: The SEIS does not provide enough consideration for the negative experiences park users have when confronted with an off-leash dog. Even on-leash dog walkers have expressed discomfort with off-leash dogs. In 2005, Congresswoman Jackie Speier stated, after having worked with dog owner organizations and GGNRA officials regarding off-leash behavior for years, that:

Off-leash activity should be in areas that do not involve interaction with leashed dogs, or a fragile environment; i.e., the area should be fenced and properly noticed as to its use. For example, according to dog park experts, canine dominance factors preclude the placement of tables in dog parks-dogs jump on tables to be dominant-and problems will arise when a leashed dog is confronted by a free dog(18).

Recently, at a meeting organized by Congresswoman Speier, she stated that her position on this issue had not changed(19). It is clear that in order to accommodate all park users, off-leash dogs must not be able to roam free and bother, harass, and even injure other visitors and their dogs. Enclosing all off-leash dog areas is the only way to sufficiently deal with this issue, as discussed below.

Response: The final plan/EIS and rule meets the NPS objectives in the purpose and need, including improving visitor safety, preserving and protecting park resources and natural processes, reducing user conflicts and providing for a variety of visitor experiences. These comments have been noted in the revised chapters 3 and 4, Visitor Use and Experience in the final plan/EIS. In this final plan/EIS, dog walking will be better managed through a clear, enforceable policy and rule that delineates citable behaviors and monitors compliance with the new rule. It also will provide a balance in uses and experiences with both dog free and dog walking areas, which will be more clearly demarcated.

CONCERN STATEMENT: (Concern ID: 57431) The draft plan/SEIS does not adequately address the loss of recreation opportunities due to dog walking for those who do not enjoy dogs.

Representative Quote(s):

Corr. ID: 6191 Organization: Golden Gate Audubon Society **Comment ID: 366025 Organization Type:** Unaffiliated Individual

Representative Quote: The Canadian Fitness and Lifestyle Research Institute (CFLR) published a summary of the Toohey (2011) and McCormack (2010) studies and summarized impacts to non-dog owners due to dog activity in urban parks to include:

- Dogs are often perceived as a nuisance, due to dog waste, litter and disturbance;
- Uncontrolled dogs create perceptions of risks to public safety; and
- Older adults, women, and ethnic minorities are more likely to perceive dogs as barriers to physical activity than other groups.
 - o Women who perceived off-leash dogs in their neighborhoods had 50 minutes less of physical activity than women in neighborhoods who did not observe off-leash dogs in their neighborhoods; and

o Latino women perceived off-leash dogs in their neighborhoods or parks as barriers to letting their children play outside.

These perceptions create barriers to outdoor physical activity for many. The SEIS fails to adequately emphasize the disenfranchisement or loss of activity to many in the community due to the status quo of dog-related recreation in the GGNRA.

Response: Chapters 3 and 4, Visitor Use and Experience and Health and Safety analyzes impacts to visitors who do not enjoy dogs. The displacement of visitors who avoid park areas due to the presence and activity of dogs and dog walkers was in part evaluated through a displacement survey, and reflected in public comments. The final plan/EIS provides for approximately 2/3rds of all park trail and coastal beach areas as dog free, not including picnic areas, and in fact will provide more areas for non-dog walkers than the current condition, as well as additional focus on education and enforcement.

VU4010 - Visitor Use and Experience: Actions of Dog Owners

CONCERN STATEMENT: (Concern ID: 53441) Many commenters complimented San Francisco dog owners' responsible actions in keeping their dogs under control and keeping the park clean. These commenters believe that dog owners and walkers create a sense of community in the park.

Representative Quote(s):

Corr. ID: 1419 **Organization:** Not Specified **Comment ID:** 352518 **Organization Type:** Unaffiliated Individual

Representative Quote: In the nearly 1,000 visits I've made to the GGNRA over the past three years, including frequent weekend visits to Muir Beach, I've never encountered any bad dog behavior. Instead, I see dog owners yielding to cyclists, other hikers, and beach goers; picking up after their pets; forbidding their dogs from going off trail; and generally acting responsibly. I've found the dog owners who frequent the GGNRA to demonstrate an amazing model of responsible citizenry and consideration for others.

Corr. ID: 4817 **Organization:** Not Specified **Comment ID:** 361596 **Organization Type:** Unaffiliated Individual

Representative Quote: I have long commented that both dog owners and walkers are incredibly responsible with their dogs. They manage them, pick up after them and insure that their dogs have no impact on the many people who enjoy this recreation area and co-exist without a hitch. It is a social gathering spot that breeds community. I truly hope that you can let the park continue as harmoniously as it always has without uncalled for monitoring or enacting of a policy that the majority are content to leave be.

Corr. ID: 5437 **Organization:** Not Specified **Comment ID:** 363251 **Organization Type:** Unaffiliated Individual

Representative Quote: Reducing the amount of off leash dog areas will restrict where I can take my dog out to run, play with other dogs and get some exercise. In all of the off leash dog areas I have been to in San Francisco, the one thing I have always appreciated is how clean and open they are. From my experience, dog owners who come to these areas pick up after their dogs, are responsible with their dogs and enjoy the opportunity to let their dogs be free to run and play. I've had nothing but positive experiences. The new policy seems to be too restrictive and will make it more difficult for me to take my dog out when I'm in the area.

Response: GGNRA agrees that many dog owners are responsible, and work to keep the park clean. Affiliated user groups, like dog walkers, often create a sense of community among frequent users. This is noted in chapter 4, visitor use and experience.

CONCERN STATEMENT: (Concern ID: 53442) One commenter stated the importance of knowing dog behavior when in a public setting such as Golden Gate National Recreation Area. Stating a study on this topic (Reisner and Shofer 2008), this commenter noted that many dog owners cannot recognize situations that might become dangerous when dogs are interacting with children.

Representative Quote(s):

Corr. ID: 6631 **Organization:** Not Specified **Comment ID:** 368390 **Organization Type:** Unaffiliated Individual

Representative Quote: Dog walkers cannot be relied upon to control the behavior of their dogs to reduce the safety risk of off-leash activity. One study found that dog owners had limited knowledge of dog behavior and were unaware of factors that increased the risk of dog bites to children (Reisner & Shofer 2008). Many dog owners surveyed in the study who indicated that they were comfortable taking their dogs to public areas were making unsafe assumptions about interactions between dogs and unfamiliar children. Reisner and Sofer reported that 41% of respondents surveyed thought that it would be OK to allow their dog off leash in an area where they saw children running.

Response: The final plan/EIS evaluates the impacts of dog walking to other visitors, including children. Please see chapter 4,

Visitor Use and Experience. The final plan/EIS will enhance education, enforcement, will clearly demarcate dog / no dog areas, and will require permits for those with more than 3 dogs, all measures designed to ensure the use does not adversely impact other visitors, including other dog walkers. Also, failing to keep a dog from threatening, demonstrating aggression or harassing any visitor, child or not, will be a citable behavior.

VU4025 - Visitor Use and Experience: Commercial Dog Walkers

CONCERN STATEMENT: (Concern ID: 53443) Many commenters wish to see commercial dog walking banned from Golden Gate National Recreation Area, stating that the federal land should not be used for financial gain of a certain group. Commenters stated that the use of the park by a for-profit entity that does not pay usage fees violates NPS laws and regulations, as well as the park's enabling legislation, according to some commenters. Additionally, the use of public land and need for law enforcement personnel puts a strain on the park's already stressed resources.

Representative Quote(s):

Corr. ID: 2417 **Organization:** *Not Specified* **Comment ID:** 358917 **Organization Type:** Unaffiliated Individual

Representative Quote: In addition, I am troubled by dog walkers using national park land for commercial gain. All other commercial activities that I am aware of are regulated by NPS, pay usage fees, and adhere to detailed regulations. The nature of commercial dog walking means that this activity creates an additional burden on the already understaffed NPS, with no benefit I perceive to the rest of the public.

Corr. ID: 5415 **Organization:** *Not Specified* **Comment ID:** 363187 **Organization Type:** Unaffiliated Individual

Representative Quote: Commercial dog walking should not be allowed in the GGNRA. Other commercial enterprises typically must go through review to evaluate their impacts, benefits, and alignment with the parks' mission. This has not been done for commercial dog walking. Furthermore, commercial dog walking - often with many dogs in tow - can have a greater impact on trails, wildlife and other users than is fair. And this is not a recreational activity - it is a commercial activity that does not align with park values or mission.

Corr. ID: 6191 **Organization:** Golden Gate Audubon Society **Comment ID:** 405853 **Organization Type:** Unaffiliated Individual

Representative Quote: The SEIS does not justify why commercial dog walking (CDW) is included as a component of the Preferred Alternative. A proper evaluation should examine whether commercial dog walking is consistent with applicable laws, executive orders, regulations, and policies, which in this case include the Organic Act, the GGNRA enabling legislation, the National Parks Omnibus Management Act of 1998, the National Environmental Policy Act, NPS Management Policies 2006, and Director's Order #53.

While some may argue that dog walking is part of the mission of the GGNRA and was intrinsic in the "values or purposes for which the park was established", no one can credibly argue that the commercial enterprise of dog walking - i.e., walking a dog that you do not own for financial gain - can in any way be considered part of the GGNRA's mission or core values or purposes.

Commercial dog walking does not meet the criteria to be authorized as an appropriate activity for national parklands. It constitutes a commercial exploitation of park resources (both in environmental impacts and personnel to manage the activity). To our knowledge, commercial dog walking is not allowed in any other unit of the National Park System. Rather, where commercial activities are allowed, they are permitted only to the extent that they provide for or enhance park visitor experiences. Commercial dog walking does not provide any park enhancement benefit. At a minimum, the SEIS must be revised to demonstrate how this commercial activity complies with applicable laws and regulations.

Corr. ID: 6408 **Organization:** *Not Specified* **Comment ID:** 366922 **Organization Type:** Unaffiliated Individual

Representative Quote: Commercial dog walking should not be included as a component of whatever alternative is adopted. Commercial dog-walking constitutes an economic use of park lands that is not permitted by the NPS's Organic Act, the GGNRA enabling legislation, the National Parks Omnibus Management Act of 1998, the National Environmental Policy Act, NPS Management Policies 2006, and Director's Order #53. Commercial activities within the National Parks are allowed only to the extent that they support the park mission to protect resources and enhance the visitor experience. Commercial dog-walking constitutes a use of the public land that puts a drain on park resources without any financial or mission-oriented returns for the Park Service.

Corr. ID: 6639 **Organization:** *Not Specified* **Comment ID:** 368117 **Organization Type:** Unaffiliated Individual

Representative Quote: Do not make the same mistake as the SF Rec. & Park Dept. has made by fearing the misperception of dog owner political power and not enforce dog use. As it is now, RPD staff (gardeners, managers, recreation directors) is instructed to not confront dog owners when they violate Park Codes, yet welcome private residents to "self-police" and take the brunt of dog owner rage at being told they must stop bad behavior in local parks and playgrounds. The number of Park Ranger officers is very low and enforcing dog rules has deliberately been virtually ignored. Commercial dog walkers should prove easily visible training, licensing, and with proper personally supplied cleaning materials versus taxes paid for and supplied.

Response: The NPS has the legal discretion to allow commercial dog walking in GGNRA. Under 36 CFR Section 5.3, the NPS may allow commercial business activities in accordance with an NPS-issued permit. The NPS Management Policies allow NPS to issue Special Use Permits. Special Use Permits are permits that provide a benefit to an individual, group or organization rather than the public at large; that require some degree of management control to protect resources and the public interest, and that are not prohibited by law or regulation. The Special Use Permits that NPS would issue to commercial dog walkers meet these conditions. As explained in the preferred alternative, and as required under the special regulation, commercial dog walking will be subject to strict limitations and permit conditions. Commercial dog walkers would be limited to 6 dogs per walker and would need to qualify for a Special Use Permit to walk more than 3 dogs at one time. Off-leash use by commercial dog walkers would be limited to seven VSCAs. Violations of the special rule or permit conditions will constitute grounds for revocation or non-renewal of permits. Commercial dog walkers seeking to walk more than 3 dogs at one time will be required to pay an annual permit fee of approximately \$300, plus a \$75 processing fee. Additional details on Special Use Permits can be found in Appendix F.

CONCERN STATEMENT: (Concern ID: 53444) Commenters are concerned about the number of dogs allowed per commercial dog walker at Golden Gate National Recreation Area, both leashed and unleashed. Commenters stated that commercial dog walkers are unable to control and clean up after numerous dogs at once. When off leash, the dogs are a larger disruption to other visitors and most often not under voice control. Many commenters would prefer the number of dogs to be limited to fewer than 6 per dog walker.

Representative Quote(s):

Corr. ID: 1716 **Organization:** Not Specified **Comment ID:** 353684 **Organization Type:** Unaffiliated Individual

Representative Quote: Dogs are part of that community, and these areas represent logical places for dog walking. But the number of off-leash dogs has become unsustainable, and commercial dog walkers are abusing their free access to these areas. The limit of six dogs/person is especially important, as is enforcement of leash laws in sensitive wildlife areas. I believe that voice control of off-leash dogs is rarely happening.

Corr. ID: 1811 **Organization:** Not Specified **Comment ID:** 354135 **Organization Type:** Unaffiliated Individual

Representative Quote: In Sum, the tighter the restrictions on dog walkers, private or commercial, the better. In particular, commercial dog walkers should be heavily restricted - they have 10 dogs at times and let them off leash at times. Sometimes there is more than one commercial dog walker at same location. When requested to control animals, they are rude and claim they are not subject to regulations.

Corr. ID: 2507 **Organization:** Not Specified **Comment ID:** 359006 **Organization Type:** Unaffiliated Individual

Representative Quote: Limiting the number the number of dogs per walker is important to public safety and, potentially, to protecting the Park against liability. However, a large pack (and most dog walkers have 8 or more dogs) may have two or more aggressive dogs, and when that happens they behave like a hunting pack, circling an individual so that only one dog can be faced at a time. Furthermore, a group of dogs will behave far more aggressively than an individual. All of this is in addition to the difficulty of controlling a large group. The current sizes of dogs groups with a single walker make the park experience risky and unpleasant for other users, and frequently for other dog walkers.

Corr. ID: 4795 **Organization:** Not Specified **Comment ID:** 361550 **Organization Type:** Unaffiliated Individual

Representative Quote: The only restrictions on dog walking that could be justified would be to limit the amount of dogs that professional dog walkers can walk at a time. Virtually all the negative impacts from dog walking I observe are when professional dog walkers are walking groups of over six dogs.

Response: The park is not prohibiting commercial dog walking; however commercial dog walkers would be limited to 6 dogs per walker and would need to obtain a special use permit to walk more than 3 dogs at one time. The permits would be issued for only 7 GGNRA VSCAs, and are subject to compliance with the final plan/EIS and permit conditions. Recurring violations of the new rule and associated permit conditions will be grounds for non-renewal of permits. Details on Special Use Permits can be found in Appendix F.

CONCERN STATEMENT: (Concern ID: 53445) Commenters are concerned about the effects the proposed limits will have on commercial dog walkers and other dog-related businesses in the San Francisco area. Several commenters expressed concerns that being able to service fewer clients per day would put them out of business.

Representative Quote(s):

Corr. ID: 154 **Organization:** Seth Green Canine Care **Comment ID:** 349883 **Organization Type:** Unaffiliated Individual

Representative Quote: With regard to commercial dog walking operations (and the like), there are over 400 such businesses in San Francisco. Yelp.com currently lists 414. By simple extrapolation, that's a lot of dogs, and a good number of robust businesses that rely on public land, open space, and off leash areas in order to operate. Further restricting use of GGNRA managed lands will have a negative effect on local business. I fear that with further land use restriction and permit bureaucracy I may have to close my own business, because increasing rates unsustainably and limiting my group size to 6 will push me out of business.

Corr. ID: 1071 **Organization:** *Not Specified* **Comment ID:** 368728 **Organization Type:** Unaffiliated Individual

Representative Quote: NO STUDY TO SUPPORT Restricting Dog Walkers Pack Size to 6.

There should be some reasonable restrictions on the number of dogs that dog walkers are allow to walk off-leash at one time. I agree that 15-20 at a time is too many. However, I do believe that your suggest number limited to 6 is impractical and unfair. The San Francisco city supervisors already reviewed this issue and concluded in 2012 that restricting the number to 8 makes it possible for dog walkers to make a living wage. Below that number, it would be really hard to live in this city. Dog walkers in San Francisco play a vital role in helping families to be able to own a pet that brings them such unbelievable happiness and joy. Restricting dog walkers to fewer than 8 dogs off-leash impacts our ability to make a living wage and provide this service to San Francisco families. Matching the city park limits is the best decision for all concerned and the supervisors and Mayor Ed Lee have all voiced their concerns that if you do not match the city, you will be causing impact to nearby city parks.

Response: Please see the Cost Benefit and Regulatory Flexibility economic analyses in the proposed rule for the anticipated effects on commercial dog walkers, which found that minor price increases would mitigate economic impacts for those walking up to 8 dogs, a number beyond any national norm. Those walking 9 or more dogs at a time would face additional impacts. The Negotiated Rulemaking committee recommended an overall limit of 6 dogs, including the commercial dog walking representative on the committee. NPS was unable to find studies or other information supporting the assumption that a single dog walker could adequately control up to 9 dogs at any one time.

CONCERN STATEMENT: (Concern ID: 53446) Several commenters are concerned about different limits on dog walking being set up for Golden Gate National Recreation Area, stating that setting different standards for different visitors is discriminatory. The commenters suggest that all visitors be governed under the same regulations.

Representative Quote(s):

Corr. ID: 4256 **Organization:** *Not Specified* **Comment ID:** 368465 **Organization Type:** Unaffiliated Individual

Representative Quote: The Preferred Alternative is discriminatory in that it establishes two different standards for the allowed number of dogs per walker. All dog walkers within the GGNRA should be equally limited to a number of dogs that can be reasonably managed in a manner which is consistent with all applicable laws, regulations, executive orders, and management policies. Establishing a policy under which some park visitors are permitted to walk more dogs than other park visitors is clearly discriminatory. Establishing two separate standards, will only lead to public confusion and misperception of the rules, and a higher degree of non-compliance. We urge the Park Service to hold all dog walkers to the same standards.

Response: All visitors have common regulations that they are required to follow; in addition, different users also have access restrictions placed on them in different park areas, depending on their resource and visitor use impacts. For example, mountain bikers follow a special regulation within GGNRA.

WH2010 - Wildlife and Wildlife Habitat: Affected Environment

CONCERN STATEMENT: (Concern ID: 53447) Commenters recounted experiences of dogs harassing, disturbing, or killing wildlife. Actions include chasing shorebirds, digging in wildlife holes, and flushing upland species. Some commenters were concerned that wildlife did not have another place to go.

Representative Quote(s):

Corr. ID: 163 **Organization:** Mrs. **Comment ID:** 349914 **Organization Type:** Unaffiliated Individual

Representative Quote: I am concerned about the damage dogs do to wildlife and wildlife habits in the GGNRA. I

witness many dog owners allowing their pets to run even in restricted snowy plover nesting areas. I am a dog lover and in fact have volunteered and donated to dog rescue and welfare charities for years, but wildlife matters, too.

Corr. ID: 2291 **Organization:** *Not Specified* **Comment ID:** 357636 **Organization Type:** Unaffiliated Individual

Representative Quote: I live between Sweeney Ridge and Milagra Ridge in Pacifica and hike there often. I have had dogs run at me and have seen large dogs chase coyote, deer and rabbits. Wildlife cannot be protected without some restrictions on dogs. Unleashed dogs invite conflicts with people and coyotes. I also volunteer in a Wildlife Rehab program and see the effects on birds, skunks, opossums injured because of contact with dogs.

Corr. ID: 3280 **Organization:** *Not Specified* **Comment ID:** 358039 **Organization Type:** Unaffiliated Individual

Representative Quote: I have observed dogs in "leashed" protective sanctuary areas chasing deer, owls, birds and other wildlife, sometimes, to the owner's dismay, actually catching this wildlife in their jaws. After the wildlife has been harmed by the unleashed dog, the owner may put their dog temporarily on leash but there is not a mutual respect for the hiking trails, hillsides or wildlife there. Many dog owners here are actually offended when a person asks them to put their dog on leash in a leash only area

Corr. ID: 3397 **Organization:** *Not Specified* **Comment ID:** 358319 **Organization Type:** Unaffiliated Individual

Representative Quote: I am also an avid birder. I visited the Sutro Baths last year when the vagrant river otter was there. I was shocked when I saw some visitors let their dog tromp along the waters edge, following the movements of the otter without regard to causing stress upon the terrain or the animal.

Corr. ID: 3519 **Organization:** *Not Specified* **Comment ID:** 359160 **Organization Type:** Unaffiliated Individual

Representative Quote: I have watched my own dog chase birds along the shoreline while I ran after it, calling to no effect. I have watched other dog owners let their dogs chase birds without making any effort at all to stop them.

Corr. ID: 4808 **Organization:** Audubon Society-Marin County **Comment ID:** 361572 **Organization Type:**

Unaffiliated Individual

Representative Quote: The wildlife that dwell on the GGNRA lands also must react to their instincts to avoid any predator. Dogs 'mark' where they roam. The wildlife will move from areas that are constantly marked by these predators. The negative impacts to the native wildlife are obvious.

Corr. ID: 5689 **Organization:** *Not Specified* **Comment ID:** 364158 **Organization Type:** Unaffiliated Individual

Representative Quote: So, I was hiking Miwok to Coyote Ridge Trail yesterday, in Tennessee Valley, and there were so many dogs. Wildlife viewing is nil. Just a few brave little sparrows. One woman got way ahead of her dog on the trail, and the dog was digging into some little creatures' burrow just off the trail. You can not depend upon owners to control their dogs.

Corr. ID: 5813 **Organization:** *Not Specified* **Comment ID:** 364353 **Organization Type:** Unaffiliated Individual

Representative Quote: One particular instance stands out while at Ocean Beach, San Francisco. While surfing I noticed a cormorant playing on the inside of the breaking waves, which caught the attention of an off-leash Labrador, I think. The dog chased the bird as it bobbed in and out of the water, ultimately, catching the bird. The owner's threats and commands to stop we're futile. After the bird was fetched back to the owner, I showed my disguised, and in response, the owner berated and hit his dog. In the end, the bird died.

Response: Disturbance to wildlife and the need to protect park resources is a central rationale for the GGNRA dog management plan.

CONCERN STATEMENT: (Concern ID: 53448) Commenters questioned the wildlife resources described in the affected environment chapter of the draft plan/SEIS. Some commenters questioned the numbers or presence of wildlife in areas of the GGNRA, while others noted that wildlife in these areas was adapted to dogs. Commenters believe the data from Beach Watch surveys have severe limitations. The surveys may have missed peak migration periods; therefore, the data should not be used to draw conclusions.

Representative Quote(s):

Corr. ID: 252 **Organization:** *Not Specified* **Comment ID:** 405828 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Funston is, and has been the pre eminent dog exercise area in the Bay Area. The dominant

plant species there is Iceplant, and the dominant soil there is sand. The wildlife is birds, and none of these three is damaged or disturbed by off leash dog activities.

Corr. ID: 1905 **Organization:** *Not Specified* **Comment ID:** 354514 **Organization Type:** Unaffiliated Individual
Representative Quote: So, envision a place where there are lots of people, children, dogs, strollers, most in motion, active, even noisy. Any wildlife that could be harmed isn't likely to be revealing itself, wouldn't you think?

Corr. ID: 2820 **Organization:** *Not Specified* **Comment ID:** 405825 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs have been in the GGNRA - well - basically forever! But wildlife, plants, wild animals flourish in the park, if dogs were causing irreparable damage to the wilderness aspects of the park, would we not have seen effects by now?

Corr. ID: 5020 **Organization:** *Not Specified* **Comment ID:** 362020 **Organization Type:** Unaffiliated Individual
Representative Quote: The only "wildlife" I ever observe on the beach are large ravens and sand pipers. Ravens are non-native predators that kill off native species - surely the NPS is not trying to protect the ravens. The sandpipers are too fast for any dog to catch.

Corr. ID: 5958 **Organization:** *Not Specified* **Comment ID:** 405826 **Organization Type:** Unaffiliated Individual
Representative Quote: Mountain lions: My dog has found enough parts of adult deer to make it clear that a large predator forages in this area. The S.F. Chronicle has reported mountain lion sightings in this area, and the local paper again on Nov. 13th

Corr. ID: 5959 **Organization:** *Not Specified* **Comment ID:** 364806 **Organization Type:** Unaffiliated Individual
Representative Quote: I suspect wildlife in this region also benefits from off leash hiking areas. It should be recognized that GGNRA is part of a very large contiguous area of protected wild lands in San Mateo County. Abundant wildlife roams free here including mountain lions, coyotes, bobcats, and other predators. Human activity including responsible off leash dog hiking create a buffer between wild lands and the small discontinuous but densely populated communities adjacent to Rancho Corral de Tierra. When wildlife venture into town it seldom works out for wildlife. A buffer protects wildlife.

Corr. ID: 6218 **Organization:** *Not Specified* **Comment ID:** 366138 **Organization Type:** Unaffiliated Individual
Representative Quote: I know the geese are not native and come down from Canada seasonally and I know the deer are over populated here so it seems that having dogs off leash should not be a problem. I totally understand wild life preserves and never take my dog anywhere that doesn't allow them for I respect nature and all animals.

Corr. ID: 6631 **Organization:** *Not Specified* **Comment ID:** 405827 **Organization Type:** Unaffiliated Individual
Representative Quote: Data from Beach Watch surveys (Beach Watch 2006; 2009) is used in the SEIS. Although the data from this survey may be appropriate to use to mention the presence and general abundance of certain species of shorebirds, there are severe limitations to this data. This data is based on encounter rates as were the Snowy Plover surveys done by GGNRA, so the data on shorebirds cannot be considered as an accurate survey of shorebird populations. The surveys were done every two weeks and may not have been conducted during peak migration periods and may have completely missed the presence of some bird species during migration and the peak number of individuals of various species during migration. Although some aspects of the data may be useful, I do not think it should be used to draw conclusions about the relative species numbers or the habitat importance between different sites

Response: Chapter 4 provides a summary of the literature review that was conducted to document associations between dogs and wildlife. The information has been used to supplement other information in the impacts analysis. Some studies have shown that "local wildlife does not become habituated to continued disturbance" by dogs (Banks and Bryant 2007, 612).

WH4000 - Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives

CONCERN STATEMENT: (Concern ID: 53449) Commenters had concerns about impacts of dogs on wildlife, including dogs impacting bird energy reserves and foraging. Some commenters felt the impacts analysis did not adequately address the impacts of dog walking on wildlife, and that scientific studies, including those cited in the EIS, clearly support the conclusion that dogs do impact wildlife.

Representative Quote(s):

Corr. ID: 219 **Organization:** *Not Specified* **Comment ID:** 350135 **Organization Type:** Unaffiliated Individual
Representative Quote: In addition to the recreational issue is the issue of wildlife compatibility. While I have statistics on human use, my findings on wildlife use are more incidental based on observations of sign (e.g., scat and tracks) and direct observations of wild animals. In areas that have heavy use of unleashed dogs, it appears that the use of these areas by small and medium mammals and especially carnivores such as weasels, skunks, raccoons, foxes, and even coyotes is vastly diminished.

Corr. ID: 617 **Organization:** *Not Specified* **Comment ID:** 352741 **Organization Type:** Unaffiliated Individual
Representative Quote: Dog owners don't understand the impact that their dogs have on wildlife. When dogs chase shorebirds, for example, they not only have the potential to catch and kill them (as one did last year to two goslings). They also are, demonstrably, halting the bird's necessary foraging activities. The birds have nowhere else to go to forage and roost.

Corr. ID: 663 **Organization:** *Not Specified* **Comment ID:** 352855 **Organization Type:** Unaffiliated Individual
Representative Quote: Another point is wildlife. Dogs disrupt areas that are habitat, mostly nesting sites for birds. Unmanaged dogs can do even more damage to the environment. Birds are the most harassed animal species, shorebirds in particular. Shorebirds do not nest in trees; preferred nesting sites are in sand dunes and grasses above tidal areas. Dogs will walk over nests, chase birds, kill adult birds, exhaust the bird's energy resulting in death, and frighten nesting birds to the point of those birds not going back to the nesting site. If there are chicks or eggs present, death of the young will occur. A prime example is the Western Snowy Plover (*Charadrius nivosus nivosus*) (Foster 2006). This bird is protected under the Endangered Species Act and as such, disruption from dogs can lead to large fines for the owner and possible destruction of the dog if the same problem of harassing or harming of federally protected animals is a common occurrence. Dogs may also attack small mammals, amphibians, or reptiles which can be found in recreational parks and trails (National Park Service).

Corr. ID: 4110 **Organization:** Audubon **Comment ID:** 361445 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs startle and harass wildlife and can disturb humans.
 A UC Berkeley study in the Eastshore State Park found that dogs consistently startle and chase migratory birds away from their foraging and resting, as well as harass and disturb nesting birds away from their crucial activities.

Corr. ID: 5151 **Organization:** International Urban Estuary Network/Save the Bay **Comment ID:** 405820
Organization Type: Unaffiliated Individual
Representative Quote: The SEIS fails to adequately state the impact of off leash dogs on wildlife. There have been many incidences in the GGNRA of wildlife killed by dogs. Countless studies, at least one by the GGNRA itself, have documented the adverse effects off leash dogs have on wildlife. I myself have never been to Ocean Beach without witnessing the harassment of shorebirds by a series of dogs. Yet these impacts on natural resources is given too scant attention in the SEIS and not enough weight put on preventing stress to wildlife.

Corr. ID: 5445 **Organization:** *Not Specified* **Comment ID:** 363284 **Organization Type:** Unaffiliated Individual
Representative Quote: The evident assumption that dogs that are under voice control will indeed be under control leads to the EIR grossly understating the impacts of dogs in areas where they would be permitted off-leash under some of the plans. Areas that permit off-leash dogs will experience substantial declines in terms of wildlife and bird habitat. This should be acknowledged.

Corr. ID: 6474 **Organization:** *Not Specified* **Comment ID:** 405824 **Organization Type:** Unaffiliated Individual
Representative Quote: Off-leash dogs can be a serious safety risk and are a huge disturbance to the increasingly smaller numbers of wildlife that remain in the GGNRA. There is no easy way to balance human pets and wildlife in the GGNRA, but the scientific evidence presented by the National Park Service and independent experts clearly point to the conclusion that dogs must be on leash or excluded from any GGNRA area where endangered and threatened wildlife and their habitat, plus native plants, have been documented.

Response: Chapter 4 provides a summary of the literature review that was conducted to document associations between dogs and wildlife. The information has been used to supplement other information in the impacts analysis. Numerous studies used in the final plan/EIS have documented disturbance to wildlife species as a result of domestic dogs in recreational/park settings (Burger et al. 2004, 287; Davidson and Rothwell 1993, 101; George and Crooks 2006, 14; Kirby et al. 1993, 55; Lafferty et al. 2006, 2222; Lenth et al. 2008, 223; Miller et al. 2001, 131, 118; Smit and Visser 1993, 10; Thomas et al. 2003,

69; Yalden and Yalden 1990, 249).

CONCERN STATEMENT: (Concern ID: 53450) Commenters questioned impacts analysis of dogs on wildlife, and many noted that the impacts analysis overstates the impact of dogs on wildlife. Without site-specific studies, there is no proof impacts are occurring. Some commenters requested that less stringent or restrictive alternatives or changes be chosen based on the impacts from dogs on wildlife.

Representative Quote(s):

Corr. ID: 526 Organization: Not Specified Comment ID: 351867 Organization Type: Unaffiliated Individual

Representative Quote: I am a birder and a dog owner who has visited Fort Funston for 2 decades. Question: why close area at FOOT of bluff when swallows are nesting? Dogs do not bother swallows, who are fast aerial. If anything is to be closed to people dogs, it should be the TOP of the bluffs, to avoid crumbling.

Point (not about swallows, but about other species that nest in scrub): DOGS EXCLUDE FERAL CATS. If you get rid of dogs, you will have a cat problem, as in Golden Gate Park.

Corr. ID: 632 Organization: Not Specified Comment ID: 405819 Organization Type: Unaffiliated Individual

Representative Quote: The proposal to ban dogs on Crissy Field in order to protect wildlife/sensitive species is not consistent with the regular use of Crissy Field as an event space (e.g. for races/walks, Fleet Week, etc.). The document needs to be modified to present the impacts of dogs in proper context of all other uses of these same spaces. The document mischaracterizes dog's presence in the Wildlife Protection Area (beach at the west end of Crissy Field). In my experience, dog owners are very mindful of not allowing their dogs to enter the WPA, and even remind other dog owners who may inadvertently let their dogs in the WPA that dogs are not allowed during most of the year. The document needs to modify its characterization of dog presence in the WPA.

Corr. ID: 989 Organization: Not Specified Comment ID: 354363 Organization Type: Unaffiliated Individual

Representative Quote: The justification given in the Fall 2013 Draft Dog Management Plan for requiring dogs to be on-leash on Muir Beach is the need to protect sensitive habitat (p. 113, and Table 6, p. 256). However, that report does not establish that dogs, which have been using Muir Beach under voice control since 1979, have damaged the environment or harmed wildlife at Muir Beach. To the contrary, Table 14 (p. 315) reports only one dog-related incident of wildlife disturbance over a four year period. And the beach itself has not been damaged by dogs playing there.

Corr. ID: 1071 Organization: Not Specified Comment ID: 368732 Organization Type: Unaffiliated Individual

Representative Quote: Invalid assumptions regarding Protecting Wildlife

One of the main objectives of the Management Plan states that it is to protect native wildlife and their habitat, which includes harassment or disturbance by dogs. Other uses of GGNRA lands (e.g. hiking, biking, hang-gliding, horseback riding) have a greater impact than dog walking and their access is not being limited or addressed. Birds and other wildlife have the rest of the California coast to make their home, while San Francisco needs a place to exercise a growing dog population.

We talked about ground-nesting birds being at risk because of off-leash dogs in the area, yet raccoons, coyotes, and humans are just as detrimental. The birds don't appear to be scared of dogs. If you ever watch a dog swimming or running towards one, they wait until the last minute before moving, and then only move a short distance away. The birds appear as if they're teasing the dogs. The birds, in all honesty, seem to be playing with the dogs.

Any of the areas where dogs would be restricted on the premise that dogs are impacting wildlife are currently doing well, despite the fact that dogs are present there. It has not been shown that removing dogs from the GGNRA will have a beneficial impact on wildlife in the park. Wildlife has adjusted over time to dogs so they are no longer viewed as a threat, and dogs are not impacting wildlife. The SEIS admits the GGNRA has not conducted site-specific studies at GGNRA sites to document impacts from dogs on vegetation and soils (p. 373). Yet they also claim these impacts are currently occurring in the GGNRA and therefore dog walking must be curtailed to stop them (e.g., p. 97). Without site-specific studies, there is no proof impacts are occurring.

Corr. ID: 1203 Organization: Not Specified Comment ID: 351969 Organization Type: Unaffiliated Individual

Representative Quote: We believe that the wildlife of Marin County has enough protected land to exist without taking more away from dog owners. If this is not the case we would like to see scientific evidence of this.

Corr. ID: 2794 **Organization:** *Not Specified* **Comment ID:** 368794 **Organization Type:** Unaffiliated Individual

Representative Quote: Dog-Wildlife Disease Transmission

13. SEIS, pages 382-3, relying primarily on Sime 1999, argues that dogs in the GGNRA will spread diseases to wildlife in the GGNRA.

As usual, Sime is an unreliable source. Her studies do not show disease transmission from pet dogs to wildlife. Further, although SEIS presents evidence that there is rabies in northern California, especially among bats, there is no evidence that the rabies comes from pet dogs. In fact, dogs are more likely the victims of transmission of rabies or distemper from wild animals. In this case, it is simply a pet owners responsibility to vaccinate pets against these diseases to protect the pets. No GGNRA pet policy is going to affect disease prevalence among wild animals in the Bay Area.

Corr. ID: 4551 **Organization:** *Not Specified* **Comment ID:** 360595 **Organization Type:** Unaffiliated Individual

Representative Quote: In Marin especially, many residents live near the GGNRA and have dogs without a lot of other places to take them. Obviously, if we were to turn the entire GGNRA into a dog park for a million canines a day, that would be a problem. But finding a few places where they can run won't kill massive numbers of birds or cause the extinction of severely endangered species of fauna and flora.

Corr. ID: 5270 **Organization:** *Not Specified* **Comment ID:** 362847 **Organization Type:** Unaffiliated Individual

Representative Quote: In general, characterization of dog-related issues in the SEIS is misleading. The SEIS document has failed to provide evidence that dog walking is resulting in conflicts and resource degradation. From 2008 through 2011, a total of 1,537 dog-related incidents associated with natural resources occurred at GGNRA according to Table 6 in the SEIS. However, out of a total of 1,537 dog-related incidents, there were only three incidents of dogs destroying vegetation. Meanwhile, there were only 15 dog-related incidents of dogs disturbing wildlife. 1,519 incidents were related to dogs being off-leash in on-leash areas or dogs being in closed areas-incidents that could be attributed to lack of public education and signage by GGNRA.

Corr. ID: 5727 **Organization:** *Not Specified* **Comment ID:** 405822 **Organization Type:** Unaffiliated Individual

Representative Quote: I was particularly surprised to hear about some of these access-threatened locations, because there is very little wildlife in them to protect. Crissy field is a lawn, not wilderness. Fort Funston and Ocean Beach have no plant life. These restrictions feel very arbitrary in the public eye and do not seem to serve the greater good.

Corr. ID: 6124 **Organization:** *Not Specified* **Comment ID:** 365506 **Organization Type:** Unaffiliated Individual

Representative Quote: the Natural resources objective is to reduce the detrimental effects of dogs on wildlife and natural vegetation. However, throughout the report, I find no evidence that shows that the present policies have produced any particular detrimental effects. There are many hypothetical statements, and plausible observations, but the plain truth is that the overwhelming majority of off-leash dog use in the GGNRA is on beaches or on planted lawn areas, where none of the detrimental effects are even possible.

Corr. ID: 6178 **Organization:** *Not Specified* **Comment ID:** 365758 **Organization Type:** Unaffiliated Individual

Representative Quote: Further, to the extent that many of these complaints are related to incidents where "birds took flight" (as seems to be the case for most of the incident reports selected for inclusion in the report), I think we're over-reacting a bit. I see birds take flight all the time, and generally don't regard these incidents as crimes against nature. If one incident each day of birds taking flight is caused by a dog, out of thousands of such incidents every day in the GGNRA, I think we should all find something else to worry about, even if there is one bird lover out there that finds these events unacceptable.

Corr. ID: 6631 **Organization:** *Not Specified* **Comment ID:** 368439 **Organization Type:** Unaffiliated Individual

Representative Quote: Although the section on disturbance to wildlife has been improved since the initial EIS draft, something is missing. Although some relevant literature is discussed regarding disturbance, there is little discussion on the actual disturbance that is occurring at GGNRA that can be observed on a daily basis. A reader of the SEIS who had not observed disturbance by off-leash dogs at GGNRA might not realize the seriousness of the disturbance actually

occurring. GGNRA scientific staff have decades of experience observing this disturbance, yet the only actual instances of disturbance mentioned are from law enforcement incident reports, which are random and non-systematic observations that only occur because of a violation documented by law enforcement staff, not scientific professionals. Observations from scientific staff would be much more useful.

Response: Chapter 4 provides a summary of the literature review that was conducted to document associations between dogs and wildlife. While not site specific, the studies are relevant and peer-reviewed, and NPS has no reason to believe dogs would behave differently within GGNRA where species and habitat are similar, and has documented multiple instances of dogs disturbing wildlife. The final plan/EIS states that dogs are viewed as a contributing factor to impacts associated with wildlife, and the total elimination of dogs in the park would not eliminate effects on wildlife, because visitors without dogs would continue to visit the park and use the trails/roads at GGNRA. However, peer-reviewed literature has documented disturbance to wildlife species as a result of domestic dogs in recreational/park settings (Burger et al. 2004, 287; Davidson and Rothwell 1993, 101; George and Crooks 2006, 14; Kirby et al. 1993, 55; Lafferty et al. 2006, 2222; Lenth et al. 2008, 223; Miller et al. 2001, 131; Pfister et al. 1992, 118, Smit and Visser 1993, 10; Thomas et al. 2003, 69; Yalden and Yalden 1990, 249). Management actions such as closing or limiting areas to people and/or dogs have been suggested to reduce disturbance to wildlife species as has been demonstrated in studies discussed above (Banks and Bryant 2007, 2; George and Crooks 2006, 14; Lafferty et al. 2006, 2224; Miller et al. 2001, 131; Pfister et al. 1992, 124; Reed and Merenlender 2011, 513). Similarly, management actions such as enforcing or requiring leash laws have also been suggested to reduce impacts to wildlife as a result of domestic dogs (Burger et al. 2004, 287; Lenth et al. 2008, 223; Miller et al. 2001, 131; Thomas et al. 2003, 71). Some studies have shown that "local wildlife does not become habituated to continued disturbance" by dogs (Banks and Bryant 2007, 612). The preferred alternatives selected both protect wildlife and their habitat as needed while providing a variety of visitor experiences at each site.

CONCERN STATEMENT: (Concern ID: 53451) Commenters questioned the scientific studies used to justify impacts in the draft plan/SEIS, or noted that impacts were due to other factors.

Representative Quote(s):

Corr. ID: 655 Organization: Not Specified Comment ID: 352834 Organization Type: Unaffiliated Individual

Representative Quote: Every bit of 'science' GGNRA has provided as a reason to prohibit dogs has been shown to be faulty. Case in point: "Shadows from dogs running above the cliffs frighten the cliff swallows." There are no shadows cast from above the cliffs. The sun rises in the East and sets in the West making it impossible. The ravens, now almost the only birds present, do harass all the other birds. There were once swallows, sparrows, finches, hawks, even occasionally great horned owls there. None were discouraged by dogs. Ravens, encouraged by misguided humans feeding them, have changed the bird populations. Yet there is no signage to prohibit the feeding of wildlife.

Corr. ID: 1520 Organization: Not Specified Comment ID: 352981 Organization Type: Unaffiliated Individual

Representative Quote: There's no evidence that dogs do any damage to wildlife or the environment. While a few anecdotal tales are produced about dogs attacking birds or animals, this is a vanishingly small number compared to the ordinary threats these birds and animals face from natural predators, from habitat loss due to "Native Plant Restoration" or from normal urban risks - glass windows, moving cars, windmills.

Response: Chapter 4 provides a summary of the literature review that was conducted to document associations between dogs and wildlife. While not site specific, the studies are relevant and peer-reviewed, and NPS has no reason to believe dogs would behave differently within GGNRA where species and habitat are similar, and has documented multiple instances of dogs disturbing wildlife. The final plan/EIS states that dogs are viewed as a contributing factor to impacts associated with wildlife, and the total elimination of dogs in the park would not eliminate effects on wildlife, because visitors without dogs would continue to visit the park and use the trails/roads at GGNRA. However, peer-reviewed literature has documented disturbance to wildlife species as a result of domestic dogs in recreational/park settings (Burger et al. 2004, 287; Davidson and Rothwell 1993, 101; George and Crooks 2006, 14; Kirby et al. 1993, 55; Lafferty et al. 2006, 2222; Lenth et al. 2008, 223; Miller et al. 2001, 131; Pfister et al. 1992, 118, Smit and Visser 1993, 10; Thomas et al. 2003, 69; Yalden and Yalden 1990, 249). Management actions such as closing or limiting areas to people and/or dogs have been suggested to reduce disturbance to wildlife species as has been demonstrated in studies discussed above (Banks and Bryant 2007, 2; George and Crooks 2006, 14; Lafferty et al. 2006, 2224; Miller et al. 2001, 131; Pfister et al. 1992, 124; Reed and Merenlender 2011, 513). Similarly, management actions such as enforcing or requiring leash laws have also been suggested to reduce impacts to wildlife as a result of domestic dogs (Burger et al. 2004, 287; Lenth et al. 2008, 223; Miller et al. 2001, 131; Thomas et al. 2003, 71). Some studies have shown that "local wildlife does not become habituated to continued disturbance" by dogs (Banks and Bryant 2007, 612).

CONCERN STATEMENT: (Concern ID: 53453) Commenters noted that in their experience they had rarely or never seen dogs harassing, disturbing, or killing wildlife. Some commenters felt that dogs may actually protect wildlife species by preventing predators from accessing threatened species, or by preventing wildlife from entering more urban areas. In addition, restrictions on off-leash dogs due to impacts on marine mammals are contradictory to what agencies recommend.

Representative Quote(s):

Corr. ID: 2691 **Organization:** *Not Specified* **Comment ID:** 357083 **Organization Type:** Unaffiliated Individual

Representative Quote: Almost all dog people prevent their dogs from chasing or in any way intimidating birds or other animals. Since dog people are gone by sunset, the little animals who live in these areas are then free to come out and live their nocturnal lives.

Corr. ID: 2800 **Organization:** *Not Specified* **Comment ID:** 357503 **Organization Type:** Unaffiliated Individual

Representative Quote: I have very rarely if ever personally witnessed any serious conflicts with dogs and people, or dogs with wildlife. The vast, vast numbers of dog owners are extremely responsible with their dogs who engage in harmless, fun activities.

Corr. ID: 3863 **Organization:** *Not Specified* **Comment ID:** 359994 **Organization Type:** Unaffiliated Individual

Representative Quote: There may well be some areas that have some birds but there is not any documentation of their great jeopardy from dogs at present.

Corr. ID: 4596 **Organization:** *Not Specified* **Comment ID:** 361116 **Organization Type:** Unaffiliated Individual

Representative Quote: I now see more wildlife, including bobcats, coyotes, rabbits and deer than I have ever seen before. There have even been reports of mountain lions. It goes to the fact that people, dogs and all kinds of wildlife can and do co-exist.

Corr. ID: 4893 **Organization:** *Not Specified* **Comment ID:** 361709 **Organization Type:** Unaffiliated Individual

Representative Quote: It is a myth that dogs are endangering other species. The gulls, crows, willets, comorants, sanderlings, snowy plovers, and other birds know how to survive with people, dogs and horses. This is an urban space they have chosen as their home.

Corr. ID: 5542 **Organization:** *Not Specified* **Comment ID:** 363918 **Organization Type:** Unaffiliated Individual

Representative Quote: All dogs I encounter on the beach are well behaved and controlled by their owners. I have not encountered any instances of dogs harassing either wild life or other people. If anything, human impact from littering and walking on the dunes has a far greater negative impact on the beach wildlife than dogs.

Corr. ID: 5822 **Organization:** *Not Specified* **Comment ID:** 367541 **Organization Type:** Unaffiliated Individual

Representative Quote: The SDEIS states that dogs harass marine mammals at the beaches. However, the Marine Mammal Center has relied on dog walkers for years to inform them about stranded marine mammals on beaches - these beneficial aspects of dog walkers should be taken into account in all fairness. The TMMC wrote an email letter to Jane Woodman in 2006 stating this information and is attached for your information. The dog walkers are the first responders when these marine mammals wash up on beaches because of illness or injury and TMMC depends on these sightings so if possible, they can help the distressed marine mammal in a timely manner.

Corr. ID: 5852 **Organization:** *Not Specified* **Comment ID:** 364414 **Organization Type:** Unaffiliated Individual

Representative Quote: My observation is that the dogs at Funston are well behaved and do not damage the environment. I have never seen dogs harass birds or other wildlife, and the overwhelming majority of people at Funston are meticulous about cleaning up after their dogs. Birds on the beach will move or fly off to a slightly different location if approached by dogs or humans.

Corr. ID: 6716 **Organization:** San Francisco Dog Owners Group **Comment ID:** 499767 **Organization Type:** Unaffiliated Individual

Representative Quote: On p. 262, the SEIS says: "Stranded marine mammals and marine mammals that have hauled-out on GGNRA lands often attract the attention of dogs and people. The Marine Mammal Center data indicate that marine mammals are often harassed by dogs." This

statement implies the Marine Mammal Center supports restrictions on off-leash dog walking on beaches in the GGNRA and is clearly intended to put dog walking in a poor light. However, during Negotiated Rulemaking, the representative from the Marine Mammal Center on the NR Committee read a statement opposing restrictions on off-leash dog walking on beaches because people walking dogs in the early morning were frequently the first ones to find the mammals and call the Center to come help the animals. They worried that restricting off-leash would cut down on the calls and mean it would take longer for the animals to get the help they might need. The statement in the SEIS should be either removed or qualified with the Negotiated Rulemaking letter.

Response: NPS has numerous documented instances of wildlife disturbance by dogs. NPS does not have evidence to support the idea that dog walking is protecting threatened species from predators, nor has NPS been provided scientific studies demonstrating that effect. Dog presence at a site and on-leash dogs can disturb wildlife and/or cause a flight response through their presence on the beach or other habitats and by lunging/barking at roosting, resting, and feeding wildlife. For shorebirds (such as the western snowy plover), dogs could interrupt roosting or foraging, which causes the expenditure of energy; frequent disturbance of this type affects fat reserves needed for migration and breeding. Chronic disturbance during the nonbreeding season could indirectly affect breeding behavior. As stated in Sime (1999, 8.4): "If dogs chase or pursue wildlife, injuries to wildlife could be sustained directly or indirectly as a result of accidents that occur during the chase rather than direct contact with the dog. Injuries sustained may result in death or may compromise the animal's ability to carry on other necessary life functions resulting in eventual death, or reduced reproductive success. Even if dogs do not catch, but only chase birds and other wildlife, the modification of normal behaviors such as feeding, nesting, grooming, and resting can occur through repeated disturbance and wildlife may relocate from preferred habitat to other areas to avoid harassment, including the displacement of wildlife from public to private lands." It is also important to note that an alternative site may not necessarily be preferred habitat or suitable nearby habitat may not be available. The response of animals to predation risk is exactly the same as the response to disturbance; a species with suitable habitat nearby may avoid disturbance simply because there are alternative sites available (Gill et al. 2001, 266). By contrast, animals with no suitable habitat nearby will be forced to remain despite the disturbance, regardless of whether or not this will affect survival or reproductive success (Gill et al. 2001, 266). Please see chapter 4 of the final plan/EIS for a detailed summary of the existing credible scientific literature.

Regarding impacts to marine mammals, chapter 4 of the EIS states that: "Stranded marine mammals and marine mammals that have hauled-out on GGNRA lands often attract the attention of dogs and people. The Marine Mammal Center data indicate that marine mammals are often harassed by dogs. Dogs have been observed surrounding marine mammals, chasing them back to the water, and in one case, attacking a California sea lion (MMC 2012a, 1)." Regarding the federally-threatened Steller Sea Lion, the EIS notes that "There is a historical sea lion haul-out location at Seal Rock in San Francisco, and this species is an occasional vagrant of offshore marine habitat. Steller sea lions could be found hauled out or stranded, if injured or sick, along the coastal portions of GGNRA. However, this species is unlikely to be affected by dog management and in 9 years of collected data by the Marine Mammal Center (2000 through 2005 and 2007 through 2009), there were no recorded strandings of Steller sea lions at GGNRA (MMC 2010)."

WQ4000 - Water Resources: Impact Of Proposal And Alternatives

CONCERN STATEMENT: (Concern ID: 53454) Commenters noted that dog waste entering creeks and waterways contaminates the water, which violates clean water laws and contaminates drinking water.

Representative Quote(s):

Corr. ID: 120 Organization: Not Specified **Comment ID: 345838 Organization Type:** Unaffiliated Individual

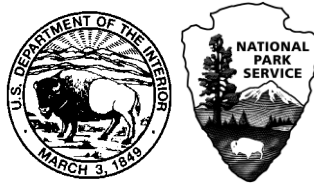
Representative Quote: Walking through the trees by Lobos Creek you will find an enormous amount of used dog waste bags left behind, on the ground in the runoff areas for Lobos Creek. 80% of the water that the residents of the Presidio Park comes from Lobos Creek. Many of these residents have small children. Even if these people's rent didn't fund a lot of the maintenance on the park, it is unethical and violates clean water laws to contaminate drinking water with dog feces. Many dog walkers - walking several dogs at a time - walk through the park and near Lobos Creek runoff areas. All medications and flea control that these animals receive are leaching into the water when people let the dogs use the area as a personal toilet.

Corr. ID: 5777 Organization: Concerned Citizen **Comment ID: 364286 Organization Type:** Unaffiliated Individual

Representative Quote: On countless occasions, owners have let dogs contaminate waterways by not picking up feces; have actively ignored posted signs pertaining to presence of endangered species; and have created situations in which both humans and dogs could be injured.

Response: Water quality is discussed in chapter 1 but has been dismissed from further analysis. Although water quality

monitoring currently occurs at GGNRA, no site-specific, peer-reviewed studies have been conducted at the GGNRA sites to document impacts to water quality specifically from dogs. There is a general agreement that dog waste and nutrients may affect water quality, but this impact cannot be isolated or quantified at the park. Since no site-specific studies support the impact analysis, the water quality discussion/impacts have been dismissed from further analysis in chapter 1.



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.

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