

September 13, 2006

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

Dear Mr. O'Neill:

I have two observations that I would like included in the public comments for the *Negotiated Rulemaking Advisory Committee for Dog Management Regulation at Golden Gate National Recreation Area*.

The first observation: I have attended the first four meetings of the Committee as a member of the public. I have attempted to follow the discussion in these meetings. I have read all of the materials that have been presented as they are made available to the public. Still, I must confess to being less than clear on the role of this Committee.

The meetings are all run by NPS staff and the facilitators hired by NPS. The role of the Committee members has been limited to asking questions and making comments on information presented by the NPS and its facilitators. They have had no role in the determining the content of the meetings or in presenting content. So far, this has been strictly an NPS show, Committee members seem to be there only to fill the seats on the Committee. The Committee resembles more an autocratic classroom than a democratic body.

The second observation: it wasn't until the handouts from the second meeting were made available to the public on the NPS Park Planning website, that I realized the very restricted parameters and scope the NPS is imposing upon the Committee. In particular, the very specific and limited areas in the GGNRA that are up for consideration by the Committee for use with dogs.

The Charter for the Committee, dated February 7, 2006, and the Federal Register Notice announcing the formation of the Committee, dated June 28, 2005, both list areas that are not up for consideration; but do not list the specific areas that can be considered (and by extension eliminating all other areas from consideration). The wording from the Charter regarding the parameters and scope of the Committee is included below.

In addition, I have attached an Excel spreadsheet that lists the off-leash/voice-control areas and on-leash areas in Marin County as specified by the GGNRA in 1979 and in 1996; and the parameters and scoping for Marin County that were presented to the Committee at the April 18th and July 31st meetings. I have attached this spreadsheet to provide clarity for members of the public about what areas are currently being considered for Marin. I would like this letter and the spreadsheet included in the public record. Thank you.

Wording from the Charter for the Committee, dated February 7, 2006, and the Federal Register Notice announcing the formation of the Committee, dated June 28, 2005:

“The following areas of the park, in which pets have never been allowed (i.e., there is not history of dog walking use and/or it has not been an issue) or have been restricted due to sensitivity of resources, are precluded from consideration by the Committee for off leash uses: Alcatraz; China Beach; Crissy Beach tidal marsh and wildlife protection area as designated by the 1996 Crissy Field Plan Environment Assessment; East Fort Baker Pier; areas closed to visitor and pet access at Fort Funston; Kirby Cove; Muir Woods; Phleger Estate; Fort Point historic structure; the beach at Stinson Beach; Tennessee Valley; Muir Beach Lagoon; Rodeo Lagoon; Rodeo Lake; Redwood Creek; all trails in undeveloped areas; all areas closed to off-trail travel; and all freshwater bodies in the park.

On-leash dog walking could be considered in areas with threatened and endangered species only if it is demonstrated that adverse effects or impacts are minimal and could be mitigated. “

The attached spreadsheet lists areas in Marin County from:

1979 Approved Guidelines for Pet Policy

July 7, 1996 Title 36, Chapter 1 Compendium Agreement

November 7, 2002 revised March 16, 2006 Federal Panel Recommendation to the General Superintendent on Proposed Rulemaking for Pet Management at GGNRA

November 7, 2002 revised July 31, 2006 Federal Panel Recommendation to the General Superintendent on Proposed Rulemaking for Pet Management at GGNRA

Sincerely,

Sonja Hanson
524 Spring Street
Sausalito, CA 94965

Cc: A. Belser, D. Whitson, C. McGlashin, B. Boxer, D. Feinstein, L. Woolsey, Pacific Sun