

National Park Service
U.S. Department of the Interior



Golden Gate National Recreation Area

GOLDEN GATE NATIONAL RECREATION AREA
DRAFT DOG MANAGEMENT PLAN/DRAFT
ENVIRONMENTAL IMPACT STATEMENT
COMMENT RESPONSE REPORT



SEPTEMBER 2013

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TABLE OF CONTENTS

INTRODUCTION AND GUIDE	1
Introduction	1
Public Comment Process Summary	1
Nature of Comments Received.....	2
Definition of Terms	3
The Comment Analysis Process.....	3
Guide to this Document.....	4
CONTENT ANALYSIS REPORT	5
Comment Distribution by Code.....	5
Correspondence Signature Count by Organization Type	10
Correspondence Signature Count by Correspondence Type	10
Correspondence Distribution by Country.....	10
Correspondence Distribution by State.....	11
PUBLIC COMMENT SUMMARY	12
AD1100 – Alternative Development: Comments to Process	12
AL1000 – Suggest New Alternative Elements.....	18
AL5000 – Comments on Dog Walking Permit System	36
AT1300 – Alta Trail: Desire Other Alternative.....	43
AT1400 – Alta Trail: Suggest Change in Alternative	43
AW1000 – Animal Welfare: Impact on/to Dogs.....	44
BB1300 – Baker Beach: Desire Other Alternative.....	48
BB1400 – Baker Beach: Suggest Change in Alternative	49
CB1000 – Comments Regarding the Compliance Based Management Strategy	50
CC2000 – Consultation and Coordination: Reg-Neg Process.....	58
CF1300 – Crissy Field: Desire Other Alternative	60

CF1400 – Crissy Field: Suggest Change in Alternative	63
CO1100 – Comments Considered an Individual Concern Statement	72
CR2010 – Cultural Resources: Affected Environment	93
CS1300 – Cattle/Sweeney: Desire Other Alternative.....	96
CS1400 – Cattle/Sweeney: Suggest Change in Alternative	98
EJ2010 – Environmental Justice: Affected Environment.....	101
EJ4000 – Environmental Justice: Impact of Proposal and Alternatives	102
FB1300 – Fort Baker: Desire Other Alternative	103
FB1400 – Fort Baker: Suggest Change in Alternative	104
FF1300 – Fort Funston: Desire Other Alternative.....	104
FF1400 – Fort Funston: Suggest Change in Alternative	109
FM1300 – Fort Mason: Desire Other Alternative	119
FM1400 – Fort Mason: Suggest Change in Alternative	120
FP1300 – Fort Point: Desire Other Alternative	124
FP1400 – Fort Point: Suggest Change in Alternative.....	125
FT1300 – Fort Miley: Desire Other Alternative.....	126
FT1400 – Fort Miley: Suggest Change in Alternative	126
GA1000 – Impact Analysis: General Comment.....	127
GA2000 – Impact Analysis: Use Trends and Assumptions	128
GA3000 – Impact Analysis: General Methodology for Establishing Impacts/Effects.....	130
GR2010 – Geologic/Soil Resources: Affected Environment	142
GR4000 – Geologic Resources: Impact of Proposal and Alternatives.....	146
HS2010 – Health and Safety: Affected Environment	147
HS4000 – Health and Safety: Impact of Proposal and Alternatives.....	152
HS4010 – Health and Safety: Impacts of Dogs vs. Humans	158
HS4015 – Health and Safety: Impacts of Dog Related Incidents.....	161

HV1300 – Homestead Valley: Desire Other Alternative	163
HV1400 – Homestead Valley: Suggest Change in Alternative.....	165
LE1300 – Lands End: Desire Other Alternative	165
LE1400 – Lands End: Suggest Change in Alternative	167
LP1000 – Laws and Policies: Impact of GGNRA Actions on Other NPS Units' Enforcement of Servicewide Policies and Regulations.....	168
LU1000 – Land Use: Policies and Historical Use.....	172
LU2000 – Other Agencies Policies and Mandates Regarding Dog Management.....	175
LU3000 – Land Use: Dog Parks Provided by San Francisco and Other Municipalities.....	176
LU3010 – Adjacent Lands: Impacts to Other State or County Parks.....	179
MB1300 – Muir Beach: Desire Other Alternative	183
MB1400 – Muir Beach: Suggest Change in Alternative	185
MH1300 – Marin Headlands: Desire Other Alternative	190
MH1400 – Marin Headlands: Suggest Change in Alternative	191
MP1300 – Mori Point: Desire Other Alternative	194
MP1400 – Mori Point: Suggest Change in Alternative	196
MR1300 – Milagra Ridge: Desire Other Alternative	198
MR1400 – Milagra Ridge: Suggest Change in Alternative.....	200
MT1000 – Miscellaneous Topics: General Comments	201
NL1300 – New Lands: Desire Other Alternative.....	210
NL1400 – New Lands: Suggest Change in Alternative	215
NL1500 – New Lands: Question Definition of New Lands.....	218
OB1300 – Ocean Beach: Desire Other Alternative.....	220
OB1400 – Ocean Beach: Suggest Change in Alternative	223
OV1300 – Oakwood Valley: Desire Other Alternative.....	229
OV1400 – Oakwood Valley: Suggest Change in Alternative	231
PN4000 – Purpose and Need: Park Legislation/Authority	234

PN7000 – Purpose and Need: Adequacy of EIS Purpose and Need	239
PN8000 – Purpose and Need: Objectives in Taking Action.....	240
PO2010 – Park Operations: Affected Environment	242
PO4000 – Park Operations: Impact of Proposal and Alternatives	249
PO5000 – Park Operations: Impacts	253
PP1300 – Pedro Point: Desire Other Alternative	254
PP1400 – Pedro Point: Suggest Change in Alternative.....	255
PS1000 – Comment Regarding Public Scoping Process.....	257
RB1300 – Rodeo Beach: Desire Other Alternative.....	265
RB1400 – Rodeo Beach: Suggest Change in Alternative	267
SA1100 – Site Accessibility.....	269
SB1300 – Stinson Beach: Desire Other Alternative.....	275
SB1400 – Stinson Beach: Suggest Change in Alternative	276
SH1300 – Sutro Heights: Desire Other Alternative	277
SH1400 – Sutro Heights: Suggest Change in Alternative	278
TE2010 – Threatened and Endangered Species: Affected Environment	279
TE4000 – Threatened and Endangered Species: Impact of Proposal and Alternatives.....	292
VR2010 – Vegetation and Riparian Areas: Affected Environment	303
VR4000 – Vegetation and Riparian Areas: Impact of Proposal and Alternatives.....	309
VU2010 – Visitor Use and Experience: Affected Environment	313
VU4000 – Visitor Use and Experience: Impact of Proposal and Alternatives on Visitors Who Enjoy Dogs	329
VU4005 – Visitor Use and Experience: Impact of Proposal and Alternatives on Visitors Who Do Not Enjoy Dogs	338
VU4025 – Visitor Use and Experience: Professional Dog Walkers	345
VU5000 – Visitor Use and Experience: Cumulative Impacts	353
WH2010 – Wildlife and Wildlife Habitat: Affected Environment	354

WH4000 – Wildlife and Wildlife Habitat: Impact of Proposal and Alternatives.....	366
WQ4000 – Water Resources: Impact of Proposal and Alternatives.....	379
WR2010 – Water Resources: Affected Environment.....	384
REFERENCES.....	387

LIST OF ACRONYMS AND ABBREVIATIONS

GGNRA	Golden Gate National Recreation Area
NEPA	National Environmental Policy Act of 1969
NPS	National Park Service
PEPC	Planning, Environment, and Public Comment
Plan/DEIS	Draft Dog Management Plan/ Draft Environmental Impact Statement

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INTRODUCTION AND GUIDE

INTRODUCTION

The National Park Service (NPS) prepared a Draft Dog Management Plan/Draft Environmental Impact Statement (draft plan/EIS) for Golden Gate National Recreation Area (GGNRA), which is comprised of multiple sites distributed across San Francisco, Marin, and San Mateo counties. This draft plan/EIS describes six alternatives at 21 sites¹, including the preferred alternative (chosen from alternatives A-E), 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. Because of the diversity of resources and the variety of use patterns across these park sites, a site-specific approach to analyzing the alternatives was adopted, resulting in a preferred alternative for each site.

The purpose of this action is to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park. Action is needed because under current conditions, park resources and values could be compromised to the extent that, without action, these 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. These conflicts will likely escalate if not addressed in a comprehensive plan/EIS.

PUBLIC COMMENT PROCESS SUMMARY

On January 14, 2011, the NPS released the draft plan/EIS for public review and comment. The draft plan/EIS evaluated the impacts of a range of alternatives for managing dog walking in GGNRA, and is an initial step in establishing a new regulation for dog walking in this unit of the NPS. The draft plan/EIS was available for public review and comment until May 30, 2011.

During the comment period, four public open house-format meetings were held in the San Francisco Bay Area from March 2, 2011 through March 9, 2011. Meetings were held at Tamalpais High School in Mill Valley, CA (Wednesday, March 2), San Francisco State University in San Francisco, CA (Saturday, March 5), Fort Mason Center in San Francisco, CA (Monday, March 7), and Cabrillo School in Pacifica, CA (Wednesday, March 9). The three weekday meetings ran from 4:00pm to 8:00 pm; the Saturday meeting ran from 11:00 am to 4:00 pm. During the open houses, multiple stations were set up allowing the public to review the elements and alternatives of the draft plan/EIS and ask questions of the NPS staff at each station.

Comments on the draft plan/EIS could be submitted by any of the following methods:

- Online through the NPS Planning, Environment, and Public Comment (PEPC) website
- In person at the public meetings
- By mailing or delivering comments to the GGNRA Superintendent.

¹ In the draft plan/EIS, Rancho Corral de Tierra was evaluated under New Lands. In the 2013 draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS), New Lands was removed and Rancho Corral de Tierra was added as the 22nd site, thus the draft plan/EIS evaluated 21 sites and the draft plan/SEIS evaluated 22 sites.

NATURE OF COMMENTS RECEIVED

The NPS received over 4,700 pieces of correspondence from 29 states during the comment period. The majority of correspondence (4,327) was submitted by California residents. Among the commenters from California, the topics most frequently mentioned were support for, or opposition to, the draft plan/EIS; support for, or opposition to, the different alternatives at each site; concerns regarding visitor experience; concerns for wildlife and wildlife habitat and concerns about the health and safety of individuals and dogs. Commenters from outside the United States were from Canada, Korea, and Switzerland.

Some of the concerns expressed in the comments received were:

- The plan violates the 1979 Pet Policy and/or the terms of the deeds that transferred San Francisco lands to the NPS.
- Public input was not sought or considered enough in the creation of the plan.
- Commenters felt threatened by dogs in GGRNA under current regulations.
- Commenters felt safer when dogs were present in GGNRA and would not feel as safe if dogs were banned.
- Reducing off-leash dog walking areas will negatively impact other dog parks or adjacent lands through overcrowding.
- Restricting off-leash dog walking reduces accessibility of some sites to people who are not comfortable walking their dogs on leash.
- Service dogs were not adequately addressed in the draft plan/EIS.
- Dog waste has negative impacts on the environment and human health.
- Other uses of GGNRA lands (e.g. hiking, biking, hang-gliding, horseback riding) have a greater impact than dog walking.
- The current conditions are acceptable and should not be changed.
- The current conditions are negatively affecting wildlife and natural resources and should be changed.
- The “compliance-based management strategy” is not adequately explained and/or cannot be adequately enforced.
- Signage and fencing should be used to educate visitors and protect wildlife and dogs.
- Restrictions on and a permitting system for commercial dog walkers would negatively impact commercial dog walkers’ businesses and livelihoods.
- Restrictions on and a permitting system for commercial dog walkers would have a positive impact on the visitor experience and natural resources and wildlife.

All comments, regardless of their topic, were carefully read and analyzed, and representative examples are presented in this report. All those on the project’s contact list will be notified of the project’s progress, and anyone interested in this planning project is encouraged to visit the NPS PEPC website at <http://parkplanning.nps.gov/dogplan> to view information pertaining to this project.

DEFINITION OF TERMS

Primary terms used in this document are defined below.

Correspondence: A correspondence is the entire submission received from a commenter. It can be in the form of a letter, online submission, written comment form, or comment submitted during a public meeting. Each piece of correspondence is assigned a unique identification number in the PEPC system.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It may include information such as an expression of support or opposition to the use of a potential management tool, additional data regarding an existing condition, or an opinion debating the adequacy of the analysis.

Substantive comment: Substantive comments are those comments that challenge the impact analysis; provide additional relevant information; dispute information accuracy with relevant, alternative information; provide information that leads to changes to the preferred alternative; or suggest new viable alternatives.

Code: A comment grouping centered on a specific subject. The codes were developed during the comment process and are used to track major subjects throughout the EIS process.

Concern: Concerns are a summary statement of all comments received under a particular code. Some codes were further broken down into several, related concern statements to provide a greater level of detail on the content of the comments under a specific code.

THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and combine similar public comments into a format that can be used by decision makers. Comment analysis assists the team in organizing, clarifying, and addressing technical information in the manner defined by NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- Developing a coding structure
- Employing a comment database for comment management
- Reading and coding of public comments
- Interpreting and analyzing the comments to identify issues and themes
- Preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of each correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include sorting and reporting of comments by a particular topic or issue, demographic information regarding the sources of the comments and tallies of the total number of correspondence and comments received.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters, public meeting comments and PEPC entries. All comments were read and analyzed.

Although the analysis process attempts to capture the full range of concerns, it is important to remember that this content analysis report is only a summary of the comments from those who chose to respond, rather than a statistical analysis of public opinion generally. In addition, the commenting process should not be viewed as a vote-counting process; the emphasis in the NEPA process is on content of comments rather than the number of times any comment was received

GUIDE TO THIS DOCUMENT

This report is organized as follows:

Content Analysis Report: This is the basic report produced from PEPC that provides information on the types of comments received, organized by code. The first section of the report provides a summary of the comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

Public Comment Summary: This report summarizes the substantive comments received during the comment process. These comments are organized by codes and further organized into concern statements, as described previously. Below each concern statement are representative quotes, which have been taken directly from the text of the public's comments and have not been edited; therefore there may be some uncorrected typographical, spelling and grammar errors. . Representative quotes further clarify the concern statements.

CONTENT ANALYSIS REPORT

COMMENT DISTRIBUTION BY CODE

Code	Description	Number of Correspondences	Signatures
AD1100	Alternative Development: Comments to Process	14	14
AL1000	Suggest New Alternative Elements	1422	1438
AL5000	Comments on Dog Walking Permit System	321	419
AN1000	Comments on ANPR	1	1
AT1100	Alta Trail: Support Preferred Alternative	6	6
AT1200	Alta Trail: Oppose Preferred Alternative	8	8
AT1300	Alta Trail: Desire Other Alternative	16	17
AT1400	Alta Trail: Suggest Change in Alternative	12	12
AW1000	Animal Welfare: Impact on/to Dogs	146	146
BB1100	Baker Beach: Support Preferred Alternative	11	11
BB1200	Baker Beach: Oppose Preferred Alternative	27	28
BB1300	Baker Beach: Desire Other Alternative	26	26
BB1400	Baker Beach: Suggest Change in Alternative	23	24
CB1000	Comments Regarding the Compliance Based Management Strategy	764	778
CC2000	Consultation and Coordination: Reg-Neg Process	9	10
CF1100	Crissy Field: Support Preferred Alternative	55	56
CF1200	Crissy Field: Oppose Preferred Alternative	118	118
CF1300	Crissy Field: Desire Other Alternative	99	99
CF1400	Crissy Field: Suggest Change in Alternative	103	104
CO1100	Comments Considered an Individual Concern Statement	23	25
CR2010	Cultural Resources: Affected Environment	13	13
CS1100	Cattle/Sweeney: Support Preferred Alternative	6	6
CS1200	Cattle/Sweeney: Oppose Preferred Alternative	28	29
CS1300	Cattle/Sweeney: Desire Other Alternative	18	19
CS1400	Cattle/Sweeney: Suggest Change in Alternative	17	18
DC1000	Duplicate comment	38	40
ED1000	Editorial	51	53
EJ2010	Environmental Justice: Affected Environment	16	16
EJ4000	Environmental Justice: Impact of Proposal and Alternatives	27	27
FB1100	Fort Baker: Support Preferred Alternative	5	5
FB1200	Fort Baker: Oppose Preferred Alternative	3	4
FB1300	Fort Baker: Desire Other Alternative	6	6
FB1400	Fort Baker: Suggest Change in Alternative	4	5
FF1100	Fort Funston: Support Preferred Alternative	33	34

Code	Description	Number of Correspondences	Signatures
FF1200	Fort Funston: Oppose Preferred Alternative	251	252
FF1300	Fort Funston: Desire Other Alternative	146	147
FF1400	Fort Funston: Suggest Change in Alternative	125	127
FM1100	Fort Mason: Support Preferred Alternative	6	6
FM1200	Fort Mason: Oppose Preferred Alternative	8	8
FM1300	Fort Mason: Desire Other Alternative	6	6
FM1400	Fort Mason: Suggest Change in Alternative	19	20
FP1100	Fort Point: Support Preferred Alternative	4	4
FP1200	Fort Point: Oppose Preferred Alternative	1	1
FP1300	Fort Point: Desire Other Alternative	1	1
FP1400	Fort Point: Suggest Change in Alternative	8	9
FT1100	Fort Miley: Support Preferred Alternative	1	1
FT1200	Fort Miley: Oppose Preferred Alternative	2	2
FT1300	Fort Miley: Desire Other Alternative	2	2
FT1400	Fort Miley: Suggest Change in Alternative	2	2
GA1000	Impact Analysis: General Comment	313	314
GA2000	Impact Analysis: Use Trends and Assumptions	77	78
GA3000	Impact Analysis: General Methodology for Establishing Impacts/Effects	365	368
GC1000	Off-leash dogs: Support	546	550
GC2000	Off-leash dogs: Oppose	190	191
GC3000	General Comment: Support Current Management	686	687
GC4000	General Comment: Continue to Allow Dogs within GGNRA	170	171
GC4010	General Comment: Ban All Dogs from GGNRA	110	111
GC5000	On-leash Dogs: Support	246	247
GC6000	On-leash Dogs: Oppose	41	41
GC7000	General Comment: Support New Dog Management Plan	331	343
GC8000	General Comment: Oppose New Dog Management Plan	1166	1279
GC9000	General Comment: Support Alternative A for All Sites	47	47
GC9010	General Comment: Support Alternative B for All Sites	48	49
GC9020	General Comment: Support Alternative C for All Sites	19	20
GC9030	General Comment: Support Alternative D for All Sites	107	110
GC9040	General Comment: Support Alternative E for All Sites	8	8
GC9050	General Comment: Oppose Alternative A for All Sites	4	5
GC9060	General Comment: Oppose Alternative B for All Sites	6	6
GC9070	General Comment: Oppose Alternative C for All Sites	3	3
GC9080	General Comment: Oppose Alternative D for All Sites	5	5
GC9090	General Comment: Oppose Alternative E for All Sites	5	6
GR2010	Geologic/Soil Resources: Affected Environment	27	29

Code	Description	Number of Correspondences	Signatures
GR4000	Geologic Resources: Impact of Proposal and Alternatives	8	8
HS2010	Health and Safety: Affected Environment	135	137
HS4000	Health and Safety: Impact of Proposal and Alternatives	128	128
HS4010	Health and Safety: Impacts of Dogs vs. Humans	84	86
HS4015	Health and Safety: Impacts of Dog Related Incidents	52	52
HV1100	Homestead Valley: Support Preferred Alternative	2	2
HV1200	Homestead Valley: Oppose Preferred Alternative	4	4
HV1300	Homestead Valley: Desire Other Alternative	14	16
HV1400	Homestead Valley: Suggest Change in Alternative	2	2
LE1100	Lands End: Support Preferred Alternative	2	2
LE1200	Lands End: Oppose Preferred Alternative	8	8
LE1300	Lands End: Desire Other Alternative	6	6
LE1400	Lands End: Suggest Change in Alternative	11	12
LP1000	Laws and Policies: Impact of GGNRA Actions on Other NPS Units' Enforcement of Servicewide Policies and Regulations	21	21
LU1000	Land Use: Policies and Historical Use	114	114
LU2000	Other Agencies Policies and Mandates Regarding Dog Management	5	5
LU3000	Land Use: Dog Parks Provided by San Francisco and Other Municipalities	86	88
LU3010	Adjacent Lands: Impacts to Other State or County Parks	210	211
MB1100	Muir Beach: Support Preferred Alternative	22	22
MB1200	Muir Beach: Oppose Preferred Alternative	84	84
MB1300	Muir Beach: Desire Other Alternative	55	56
MB1400	Muir Beach: Suggest Change in Alternative	40	40
MH1100	Marin Headlands: Support Preferred Alternative	10	10
MH1200	Marin Headlands: Oppose Preferred Alternative	23	24
MH1300	Marin Headlands: Desire Other Alternative	26	26
MH1400	Marin Headlands: Suggest Change in Alternative	21	22
MP1100	Mori Point: Support Preferred Alternative	7	7
MP1200	Mori Point: Oppose Preferred Alternative	21	21
MP1300	Mori Point: Desire Other Alternative	28	28
MP1400	Mori Point: Suggest Change in Alternative	32	32
MR1100	Milagra Ridge: Support Preferred Alternative	8	8
MR1200	Milagra Ridge: Oppose Preferred Alternative	5	5
MR1300	Milagra Ridge: Desire Other Alternative	13	13
MR1400	Milagra Ridge: Suggest Change in Alternative	12	12
MT1000	Miscellaneous Topics: General Comments	189	190
NL1100	New Lands: Support Preferred Alternative	8	8

Code	Description	Number of Correspondences	Signatures
NL1200	New Lands: Oppose Preferred Alternative	54	54
NL1300	New Lands: Desire Other Alternative	64	64
NL1400	New Lands: Suggest Change in Alternative	65	65
NL1500	New Lands: Question Definition of New Lands	7	8
OB1100	Ocean Beach: Support Preferred Alternative	26	26
OB1200	Ocean Beach: Oppose Preferred Alternative	55	55
OB1300	Ocean Beach: Desire Other Alternative	57	58
OB1400	Ocean Beach: Suggest Change in Alternative	67	68
OV1100	Oakwood Valley: Support Preferred Alternative	8	8
OV1200	Oakwood Valley: Oppose Preferred Alternative	32	33
OV1300	Oakwood Valley: Desire Other Alternative	23	23
OV1400	Oakwood Valley: Suggest Change in Alternative	13	13
PN4000	Purpose and Need: Park Legislation/Authority	86	87
PN7000	Purpose and Need: Adequacy of EIS Purpose and Need	17	17
PN8000	Purpose and Need: Objectives in Taking Action	19	19
PO2010	Park Operations: Affected Environment	91	91
PO4000	Park Operations: Impact of Proposal and Alternatives	102	103
PO5000	Park Operations: Impacts	3	3
PP1100	Pedro Point: Support Preferred Alternative	2	2
PP1200	Pedro Point: Oppose Preferred Alternative	4	4
PP1300	Pedro Point: Desire Other Alternative	4	4
PP1400	Pedro Point: Suggest Change in Alternative	8	8
PS1000	Comment Regarding Public Scoping Process	85	85
RB1100	Rodeo Beach: Support Preferred Alternative	17	17
RB1200	Rodeo Beach: Oppose Preferred Alternative	20	20
RB1300	Rodeo Beach: Desire Other Alternative	21	22
RB1400	Rodeo Beach: Suggest Change in Alternative	15	15
SA1100	Site Accessibility	114	115
SB1100	Stinson Beach: Support Preferred Alternative	6	6
SB1200	Stinson Beach: Oppose Preferred Alternative	9	9
SB1300	Stinson Beach: Desire Other Alternative	9	9
SB1400	Stinson Beach: Suggest Change in Alternative	10	10
SH1100	Sutro Heights: Support Preferred Alternative	3	3
SH1200	Sutro Heights: Oppose Preferred Alternative	5	5
SH1300	Sutro Heights: Desire Other Alternative	3	3
SH1400	Sutro Heights: Suggest Change in Alternative	7	8
TE2010	Threatened and Endangered Species: Affected Environment	218	222
TE4000	Threatened and Endangered Species: Impact of Proposal and Alternatives	450	451

Code	Description	Number of Correspondences	Signatures
VR2010	Vegetation and Riparian Areas: Affected Environment	66	68
VR4000	Vegetation and Riparian Areas: Impact of Proposal and Alternatives	16	16
VU2010	Visitor Use and Experience: Affected Environment	294	299
VU4000	Visitor Use and Experience: Impact of Proposal and Alternatives on Visitors Who Enjoy Dogs	300	301
VU4005	Visitor Use and Experience: Impact of Proposal and Alternatives on Visitors Who Do Not Enjoy Dogs	150	153
VU4025	Visitor Use and Experience: Professional Dog Walkers	323	326
VU5000	Visitor Use and Experience: Cumulative Impacts	1	1
WH2010	Wildlife and Wildlife Habitat: Affected Environment	272	276
WH4000	Wildlife and Wildlife Habitat: Impact of Proposal and Alternatives	193	194
WQ4000	Water Resources: Impact of Proposal and Alternatives	13	13
WR2010	Water Resources: Affected Environment	13	13
AD1100	Alternative Development: Comments to Process	14	14
AL1000	Suggest New Alternative Elements	1422	1438
AL5000	Comments on Dog Walking Permit System	321	419
AN1000	Comments on ANPR	1	1
AT1100	Alta Trail: Support Preferred Alternative	6	6
AT1200	Alta Trail: Oppose Preferred Alternative	8	8
AT1300	Alta Trail: Desire Other Alternative	16	17
AT1400	Alta Trail: Suggest Change in Alternative	12	12

Note: Each comment may have multiple codes. As a result, the total number of comments may be different than the actual comment totals

The signatures represent the number of people who made the exact comment. If two commenters submit duplicate correspondences, the comment is coded once, but the signatures are counted separately.

CORRESPONDENCE SIGNATURE COUNT BY ORGANIZATION TYPE

Organization Type	Number of Correspondences
Business	2
Civic Groups	9
Conservation/Preservation	5
County Government	2
Federal Government	6
Non-Governmental	24
State Government	4
Unaffiliated Individual	4,661
Total	4,713

CORRESPONDENCE SIGNATURE COUNT BY CORRESPONDENCE TYPE

Type	Number of Correspondences
E-mail	30
Letter	610
Other	173
Park Form	220
Web Form	3,679
Total	4,713

CORRESPONDENCE DISTRIBUTION BY COUNTRY

Country	Percent	Number of Correspondences
United States	99.9%	4,708
Canada	0.1%	3
Korea	0.0%	1
Switzerland	0.0%	1
Total		4,713

CORRESPONDENCE DISTRIBUTION BY STATE

State	Percentage	Number of Correspondences
Alaska	0.02%	1
Arkansas	0.02%	1
Arizona	0.02%	1
California	91.81%	4,327
Colorado	0.08%	4
Connecticut	0.04%	2
Delaware	0.02%	1
District of Columbia	0.06%	3
Florida	0.08%	4
Illinois	0.06%	3
Indiana	0.02%	1
Kentucky	0.04%	2
Massachusetts	0.08%	4
Maryland	0.02%	1
Michigan	0.02%	1
North Carolina	0.04%	2
North Dakota	0.02%	1
New Jersey	0.02%	1
New Mexico	0.02%	1
Nevada	0.06%	3
New York	0.11%	5
Ohio	0.02%	1
Oklahoma	0.08%	4
Oregon	0.19%	9
Pennsylvania	0.08%	4
Rhode Island	0.02%	1
Tennessee	0.02%	1
Virginia	0.06%	3
Washington	0.13%	6
Wisconsin	0.04%	2
Unknown	6.64%	313
Total		4,713

PUBLIC COMMENT SUMMARY

AD1100 – ALTERNATIVE DEVELOPMENT: COMMENTS TO PROCESS

Concern ID: 29823
CONCERN STATEMENT: NPS should supply the research used to develop the alternatives, including methods and justifications. This plan proposes major changes to access for dog walkers. The changes are not supported by the findings in the draft plan/EIS. Impacts from noncompliance are not well documented. NPS should evaluate baseline conditions for specific sites before changing the status.

Representative Quote(s): **Corr. ID:** 1168 **Organization:** *Not Specified*
Comment ID: 193540 **Organization Type:** Unaffiliated Individual
Representative Quote: I do not pretend to speak for all lands under the CGNRA. It may be that some parcels of land would actually benefit from reduced or eliminated dog access. However, the draft dog management plan proposes across-the-board cutbacks in dog access to virtually all CGNRA land. This approach to dog management seriously undermines the individual findings contained in the report. In other words, CGNRA greatly loses credibility when it makes the same recommendation for so many parcels of land that are clearly so different from one another.

Corr. ID: 2033 **Organization:** *Not Specified*
Comment ID: 193266 **Organization Type:** Unaffiliated Individual
Representative Quote: Where is the research that was undertaken on the foregoing in creating the Alternatives?

Corr. ID: 3929 **Organization:** *Not Specified*
Comment ID: 205780 **Organization Type:** Unaffiliated Individual
Representative Quote: It is questionable that noncompliance (of dogs going off-leash in on-leash areas) will necessarily cause any impacts. I ask that the GGNRA reevaluate its logic behind its arguments and look at the baseline conditions in specific areas before coming up with a new alternative.

Corr. ID: 4666 **Organization:** *Not Specified*
Comment ID: 209160 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternatives Arbitrary; Alternative Development Process flawed, not disclosed
This section beginning on p. 45 is named the "alternative development process" however no process is identified and no rationale is presented for why the alternatives were developed the way they were. No resource protection priorities or use conflict goals were identified for the areas, which is necessary to assess the ability of the alternative to meet the goals in a manner that does not unnecessarily infringe on recreational uses without providing measurable benefit. Much more detail is needed for disclosing the alternatives development rationale and process, especially since no clear logic is apparent in the development of the alternatives - it appears very arbitrary. General themes were used to name the alternatives

(e.g. multiple use, most protective, etc.) but no information is provided as to how this theme is accomplished for the particular resources and user conflicts that are occurring in that park unit. The DEIS only states that the internal NEPA team discussed strategies and management goals. It states that there was an internal site-specific analysis (p. 46) that guided the development of alternatives, but this information is not included in the document, so is not available to the public. We are told on page 46 that Chapter 2 provides an overview of how the analysis of data, expert opinion, and best professional judgment was applied to develop management alternatives, but no such overview is included. Chapter 2 simply states that the team's internal discussions resulted in the formation of alternatives presented.

Response:

Details on the alternative development process have been added to the draft plan/SEIS. Please see chapter 2, Alternative Development Process for details.

Additional data may help to refine the conclusions in the draft plan/SEIS and reduce uncertainty regarding the level of impact on the human environment; however, all NEPA analysis - no matter the amount of supporting data - is based on a prediction of potential future conditions and, as such, always contains a degree of uncertainty. In lieu of site-specific data, 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. Citations were chosen for incorporation if the document had been previously peer reviewed, if methods to studies had been previously peer reviewed, or if the document was cited in other literature. Additional data including visitation patterns and park law enforcement data was also incorporated. 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.

Commenters suggest that NPS must allow an activity to occur unless and until it can be proven to have impacts. However, NPS Management Policies, which apply to all units of the NPS, state 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).

A new form of park use may be allowed within a park only after a determination has been made that, in the professional judgment of the

superintendent, it will not result in unacceptable impacts. Moreover, park superintendents must continually monitor all park uses to prevent unanticipated and unacceptable impacts. If unanticipated and unacceptable impacts emerge, the superintendent must engage in a thoughtful, deliberate process to further manage or constrain the use, or discontinue it. When practicable, restrictions will be based on the results of study or research. (NPS Management Policies §§ 1.5, 8.2).

Commenters' suggestion that NPS managers provide an unassailable level of scientific evidence regarding the presence or absence of impacts would both prevent the consideration of new uses and the reasonable regulation of current uses. NPS Management Policies make clear that determinations on use should err on the side of conservation, may be based on best professional judgment, and when practicable, on the results of study or research. In this way, NPS is able to make informed decisions regarding park uses that meet the primary NPS mandate to "conserve the scenery and the natural and historic objects therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." (16 USC 1).

Concern ID:
CONCERN
STATEMENT:

29825

The geographic scope of the draft plan/EIS should have been broader. Some commenters state the EIS should have addressed all lands within GGNRA. All areas addressed in the 1979 Pet Policy should have been evaluated in the draft plan/EIS. Commenters requested the scope be expanded to address all fire roads in and adjacent to GGNRA, especially in Marin County. Rancho should be evaluated with a balanced set of alternatives in the draft plan/EIS. Commenters also stated that the areas formerly opened to off-leash dog recreation in the GGNRA should be reopened for user access. These areas need to be reexamined, and only remain closed if an adverse impact is shown.

Representative Quote(s): **Corr. ID:** 3786 **Organization:** Cayuga Improvement Association

Comment ID: 205539 **Organization Type:** Unaffiliated Individual

Representative Quote: I was also disappointed that areas like the Tennessee Valley trail in Marin were left out of the report. I was told this was because dogs are not currently allowed there. All GGNRA properties should have been in the report. The report should have been written describing how dogs are managed on ALL GGNRA property. The report should reflect the entire scope of the GGNRA property and truly reflect how many areas do and to not allow dogs. When you exclude an area you are exaggerating how much of the total acreage is open to dogs now and how much of a change you are making

Corr. ID: 3991 **Organization:** *Not Specified*

Comment ID: 207411 **Organization Type:** Unaffiliated Individual

Representative Quote: I request the NPS consider an Alternative that would allow dogs on-leash on the fire roads that run out of the GGNRA and/or border the boundaries between the GGNRA and the communities that are adjacent to the GGNRA. The fire roads and the two trails listed below would allow a person with a dog on-leash to walk in the GGNRA in

Marin from the southern end of Sausalito on the fire roads that are near the eastern boundary of the GGNRA north to Marin City and Tam Valley, and then to walk west along the fire roads near the northern boundary of the GGNRA to Muir Beach.

- The GGNRA shares a border with Sausalito, Mill Valley, Muir Beach and unincorporated Marin County land including Marin City and Tam Valley. The fire roads that connect the GGNRA to these communities and the fire roads that run near the boundaries of the GGNRA with these communities should be accessible to the public walking with their dogs on-leash.

Corr. ID: 4005

Organization: *Not Specified*

Comment ID: 206272 **Organization Type:** Unaffiliated Individual

Representative Quote: It has been posited that only three of the areas in the 1979 Pet Policy for Marin County were Discussed by the Reg Neg committee. Further, few of the areas included in the 1979 Pet Policy for Marin are included for consideration in the Draft Plan/DEIS alternatives for Marin. This appears to be a serious oversight in my view.

Corr. ID: 4697

Organization: *Not Specified*

Comment ID: 227449 **Organization Type:** Unaffiliated Individual

Representative Quote: All areas identified in the GGNRA Pet Policy brochure as existing in early 2000 as off leash areas should remain off leash. To the extent any of those areas are deemed currently closed to dogs, they should be opened. The Crissy Field beach area between the Coast Guard pier and the rock area that is the current boundary for dog use should be reopened to dogs consistent with the Mitigation Matrix of the Crissy Field NSI finding.

The closure areas at Fort Funston should be reopened for user access including dog walking access absent a well founded showing of significant adverse environmental impact. The traditional off leash area on the Lands End road and path leading along the coastal cliffs should be reopened, subject to closure of certain areas away from the roadway in the event of a well founded showing of adverse environmental impact. The Ocean Beach off leash restrictions from Stairwell 21 to Sloat should be reexamined and remain restricted only if there is analysis showing a substantial basis to believe that the restriction will aid the Snowy Plover population. Any such restriction should be limited to the seasons when and areas where the Snowy Plovers are ordinarily present.

Response:

The geographic scope of the draft plan/EIS will not be expanded. The plan/SEIS considers all sites that were open to recreational dog walking use, both on leash and under voice control, in the 1979 Pet Policy in addition to other park sites that have been determined appropriate for dog walking after consideration of park resources and public safety. The NPS does not have the authority to manage dog walking regulations on non-NPS lands.

For more information on opening up areas to off-leash dog walking beyond the currently open areas, please see the "Alternative Elements Eliminated from Further Consideration" section in chapter 2. See also alternative E,

which includes the 1979 Pet Policy to the extent the purpose, need, and objectives of the plan can still be met.

Rancho Corral de Tierra has been specifically addressed as a separate site in the draft plan/SEIS. Please see chapter 2, Table 3 for a summary of alternatives for this site.

Concern ID: 29827
CONCERN STATEMENT: Commenters were concerned about the alternative development process. A no-dog alternative should have been included to comply with NEPA. The ROLA certification program should not have been eliminated due to cost concerns.

Representative Quote(s): **Corr. ID:** 4070 **Organization:** Mar Vista Stables
Comment ID: 207709 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternative Elements Eliminated from Further Analysis-Pg. 93, First whole paragraph, "This program was cost prohibitive and would have required substantial park staff time" Cost is not an acceptable reason for eliminating an alternative. If this type of management is too costly than the park service should not allow the activity in the first place.

Corr. ID: 4070 **Organization:** Mar Vista Stables
Comment ID: 207676 **Organization Type:** Unaffiliated Individual
Representative Quote: Why wasn't a global no dog alternative analyzed in the DEIS? It may not be preferred among most users, but it would satisfy the requirements under NEPA and show a good comparison of how excluding a certain use would socially affect visitors.

Response: NPS Director's Order 12, Conservation Planning, Environmental Impact Analysis, and Decision Making, states that NPS must examine a full range of alternatives that must meet project objectives to a large degree, although not necessarily completely. CEQ has defined reasonable alternatives as those that are economically and technically feasible, and that show evidence of common sense. Alternatives that could not be implemented if they were chosen, or that do not resolve the need for action and fulfill the stated purpose in taking action to a large degree, should be eliminated as unreasonable before impact analysis begins.

A no-dog alternative would not meet the purpose, need, or objectives of the plan since it would exclude all dog walking as a visitor opportunity. However, alternative B does not allow any off-leash dog walking.

The ROLA certification program was determined not feasible due to the high costs associated with this program, as well as the less than optimal results such programs have had in other jurisdictions, and was therefore eliminated.

Concern ID: 29833
CONCERN STATEMENT: NPS should have involved local citizens and citizen groups more in the development of the plan.

Representative Quote(s): **Corr. ID:** 4013 **Organization:** *Not Specified*
Comment ID: 206813 **Organization Type:** Unaffiliated Individual
Representative Quote: Perhaps the most striking feature about the proposed DDMP was the fact that local citizens (including dog owners) were not able to participate in regulation drafting. By leaving out & not actively working with the local public population, the NPS created a DDMP that ignores the needs of very people who most often use the GGNRA resources. The DDMP does include a background (though biased) on the construction of a dog management/EIS plan. The NPS efforts in 2004- 2006 to implement the Negotiating Rulemaking act and form a "neutral party" (the Negotiated Rulemaking Committee) to help draft a dog management plan was by far the best effort to include the local public in design regulation. The NRC actually contained representatives from a variety of different interest groups. The DDMP states that the NRC was able to reach consensus "on nine guiding principles, guidelines for commercial dog walking, and a site-specific alternative for Oakwood Valley (Marin County)." The NRC failed to reach consensus of other issues - "special regulation for dog management at GGNRA".

Corr. ID: 4262 **Organization:** *Not Specified*
Comment ID: 209147 **Organization Type:** Unaffiliated Individual
Representative Quote: I was upset to see that GGNRA has decided, without inputs from the local community (other than one meeting at Farallone View where the majority of the people spoke overwhelmingly in favor of allowing dog access), to ban all dogs from the property. In my opinion, this is not only unjust to the local community and doesn't support the established mixed use, but is not founded on research or analysis.

Response: NPS has engaged the public for their input throughout the planning process. See chapter 1, Advanced Notice of Proposed Rulemaking for details on the public comment period in 2002. Also see chapter 1 for details of the GGNRA negotiated rulemaking process, during which a representative group of stakeholders worked with the NPS to try to develop a special regulation for dog walking. Also in chapter 1 is information on the scoping process and public participation during development of the draft plan/EIS. Public comments on the draft plan/EIS were analyzed and resulted in changes to the alternatives analyzed.

Concern ID: 41747
CONCERN STATEMENT: Commenters have requested that justification for the dismissal of alternatives be provided.

Representative Quote(s): **Corr. ID:** 4461 **Organization:** *Not Specified*
Comment ID: 208608 **Organization Type:** Unaffiliated Individual
Representative Quote: Provide site-specific need for action justifications and dismissals of suggested alternatives; use objective standards that would apply to any recreational activities such as equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.

Response: Rationale for the alternative elements that were dismissed is available in chapter 2, Alternative Elements Eliminated from Further Consideration. Rationale for the selection of the preferred alternative is also located in chapter 2, National Park Service Preferred Alternative.

AL1000 – SUGGEST NEW ALTERNATIVE ELEMENTS

Concern ID: 29682
CONCERN STATEMENT: Number of Dogs per Walker - The park should limit the number of dogs per walker to three with no exceptions. Commenters find it hard to believe that one person can handle more than 3 dogs. Also, visitors should not be allowed to stop and congregate.

Representative Quote(s): **Corr. ID:** 1026 **Organization:** GGNP Conservancy & Golden Gate Audubon Society

Comment ID: 191801 **Organization Type:** Unaffiliated Individual
Representative Quote: There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for commercial/professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time.

Corr. ID: 1714 **Organization:** *Not Specified*
Comment ID: 191154 **Organization Type:** Unaffiliated Individual
Representative Quote: I think limiting dogs in one area like dog walkers gathering should be stopped. I believe this is part of the problem when 3 dog walkers gather to chat you will see 18-21 dogs which is intimidating to some people. 6-8 dogs per dog walker is great but no gathering will probably alleviate the problems.

So in summary, please keep real hiking trails + beaches available for off leash dogs + limit gathering of dogs.

Corr. ID: 2353 **Organization:** *Not Specified*
Comment ID: 195377 **Organization Type:** Unaffiliated Individual
Representative Quote: I would like to see the NPS adopt the preferred alternative for all others areas under consideration as well, with one exception: there should be no exceptions to the three dogs per person limit, for either commercial or individual dog walkers, in the ROLAs. One person cannot reasonably be expected to keep more than three dogs under sight and voice control; allowing this even by permit is likely to cause the ROLAs to be revoked under the compliance procedures outlined in the draft document. It would probably be simpler to maintain the three-dog limit throughout the dog-walking areas, rather than allowing six dogs in the on-leash areas and only three in the ROLAs, but staff knows much better than I whether that is the case.

Response: The draft plan/SEIS 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. 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 dogs per walker through a permit aligns with dog walking regulations in adjacent public land management agencies, thus not increasing impacts on adjacent public lands. For more information on permits, please see Appendix F of the draft plan/SEIS.

Concern ID: 29683

**CONCERN
STATEMENT:**

Fees - Commenters suggest requiring a daily, monthly, or annual dog walking fee at the park. Fee costs could cover maintenance or restoration of the area.

Representative Quote(s): **Corr. ID:** 279

Organization: *Not Specified*

Comment ID: 180933 **Organization Type:** Unaffiliated Individual

Representative Quote: I also request that you consider a dog license system with a reasonable annual fee that would allow dogs full use of the park and go into a fund used for restoration and mitigating adverse impacts.

Corr. ID: 339

Organization: *Not Specified*

Comment ID: 181110 **Organization Type:** Unaffiliated Individual

Representative Quote: We pay enough taxes here to be able to enjoy the beautiful beaches and woods of SF with our canine companions.

That said, if this is not feasible, I would propose a fee and registration for dogs to run offleash and frequent certain areas. This could allow regulation of which dogs are allowed to be offleash and would bring revenue to the city to care for any dog related expenses.

Corr. ID: 378

Organization: *Not Specified*

Comment ID: 181166 **Organization Type:** Unaffiliated Individual

Representative Quote: Why ban dogs from being off-leash. Like most government policy, it comes down to money. So why not require a usage fee for these areas. I'm sure most dog owners would be willing to pay \$15/ dog annually to use these areas. Just think, with 100,000+ registered dogs in SF alone, the revenue that would be generated to fill your pockets

Response:

A discussion of requiring a fee for use of the GGNRA has been added to chapter 2 of the draft plan/SEIS.

Concern ID: 29684

**CONCERN
STATEMENT:**

Commenters suggested that aggressive dogs, particularly aggressive breeds, should not be allowed in the park, should be on leash, or that all dogs should be required to wear a muzzle, especially if they are off leash.

Representative Quote(s): **Corr. ID:** 79

Organization: *Not Specified*

Comment ID: 223769 **Organization Type:** Unaffiliated Individual

Representative Quote: All dogs should be muzzled everywhere. In particular if they are off leash.

Corr. ID: 79 **Organization:** *Not Specified*
Comment ID: 223771 **Organization Type:** Unaffiliated Individual
Representative Quote: Pit bulls and other breeds that are bred to be aggressive should not be allowed in the park.

Corr. ID: 288 **Organization:** *Not Specified*
Comment ID: 181015 **Organization Type:** Unaffiliated Individual
Representative Quote: Look at places like Pt. Isabel, where signs clearly state that aggressive dogs must be on leash. They are on leash, and if not, they get reported and don't come back. It works.

Corr. ID: 631 **Organization:** *Not Specified*
Comment ID: 182496 **Organization Type:** Unaffiliated Individual
Representative Quote: If the GGNRA does decide to keep off leash areas, they should be muzzle requirements that are enforced. The maximum fine for breaking leash rules or muzzle rules should be \$1000 (minimum\$200).

Response: Aggressive dogs are not allowed in the ROLAs and are subject to fines per 36 CFR 2.34 (a)(4) under all alternatives, as discussed in the "Elements Common to All Action Alternatives" section of chapter 2.

Concern ID: 29686
CONCERN
STATEMENT: [Signage/Fencing - Commenters suggest using fences/barriers/vegetation and possibly entrance gates to keep off-leash dogs in certain areas and away from sensitive areas. Signs - Commenters suggest posting signs/guidelines to educate visitors when and where off-leash dogs are allowed at the park.](#)

Representative Quote(s): **Corr. ID:** 441 **Organization:** *Not Specified*
Comment ID: 181693 **Organization Type:** Unaffiliated Individual
Representative Quote: Thank you for your work on this DEIS. I support the proposed alternative, with one major exception:

I am very disappointed that the proposed alternative does not require that all areas for off leash dogs be fenced or otherwise physically restricted. The foremost duty of the National Park Service in all units is to protect its units' resources. Off leash dogs that are not enclosed by physical barriers, whether natural or man-made, pose a serious threat to those resources. Dogs do not recognize human boundaries if those boundaries are not physically restricted, and off leash dogs will wander outside them. Once they do, there is a strong chance that they will negatively impact the park resources. Physically restricting off leash dog areas is the only way to ensure that dogs will not run off leash where they will negatively impact people, wildlife, and even leashed dogs

Corr. ID: 928 **Organization:** *Not Specified*
Comment ID: 191385 **Organization Type:** Unaffiliated Individual
Representative Quote: All off-leash dog areas should be fenced or clearly delimited for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.

Corr. ID: 2654 **Organization:** *Not Specified*
Comment ID: 195448 **Organization Type:** Unaffiliated Individual
Representative Quote: How are people to know which areas to avoid if there is no guidance? Many fences signs are currently deteriorating or covered up by sand dunes or non-existent. This leads to what I see as one of the biggest problems with the destruction of restored habitat, which is mostly people entering existing restored areas where they should not be. I see families set up with on restored dunes and watch as two and four-legged creatures dig into the dunes or trample over the native plants. People would be less apt to do this if there were signs letting them know the work that has been done to such areas and how sensitive the landscape is.

Corr. ID: 2663 **Organization:** *Not Specified*
Comment ID: 195436 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to express my opinion that all off-leash areas should be enclosed to protect park users, wildlife, and other dogs. Simply, limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Corr. ID: 2739 **Organization:** Sierra Club et al
Comment ID: 195595 **Organization Type:** Unaffiliated Individual
Representative Quote: Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. This solution is perfectly all right for most if not all dog owners. They are grateful that their dogs are enclosed and protected as well. By Limiting off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats, this will allow delicate wildlife (hatchlings etc) to be protected during the time when they are small and vulnerable.

Corr. ID: 2888 **Organization:** *Not Specified*
Comment ID: 202936 **Organization Type:** Unaffiliated Individual
Representative Quote: Therefore, regardless of what actions and changes are made, There should be several large signs placed with clear "magic" language stating usage guidelines at all GGNRA park locations. Specifically, at the highly populated multi-use areas, there could also be a "you are here" map & some directionals as to access to the spot's treasures

Corr. ID: 3077 **Organization:** ASPCA
Comment ID: 201290 **Organization Type:** Non-Governmental
Representative Quote: The ASPCA supports the development of dog parks. However, we believe it is imperative to have secure fencing and gates. It is also best if the park enclosure incorporates double gates or an interior "holding pen" at the entrance, so people and their dogs can enter and exit without accidentally letting other dogs slip out of the park.

In the absence of physical barriers around an off-leash dog play areas, dogs may be lost, injured or killed. This is why a cornerstone of good off-leash park design is to enclose the area: not merely for the protection of other users, but also for the safety of our dogs. As mentioned in the proposed plan, dogs continue to be lost, injured or killed at the GGNRA because the off-leash areas at the Park presently are not enclosed. A simple enclosure would

remedy this problem, while ensuring that all park users get to choose the kind of experience they desire by choosing to either enter, or not, these fully enclosed areas.

Corr. ID: 3759 **Organization:** Wild Equity Institute
Comment ID: 228505 **Organization Type:** Unaffiliated Individual
Representative Quote: The Park Service seems to believe that only 6-foot high chain-link fences, perhaps with barbed-wire along the top, are the only physical enclosure that can be placed around off-leash dog parks. But this is far from the case. Off-leash dog parks can have a variety of physical barriers, including features from the natural environment. Indeed, a fully-enclosed off-leash dog park proposal for Lake Merritt included butterfly garden draped around the enclosure. At it' core, this argument is simply a design problem, not a problem that is so intractable that it is justify to exclude from alternatives analysis. If an area is inappropriate for a physical barrier, than it is not an acceptable place to allow dogs to roam off-leash.

Corr. ID: 3759 **Organization:** Wild Equity Institute
Comment ID: 204635 **Organization Type:** Unaffiliated Individual
Representative Quote: For all of these reasons, the Wild Equity Institute urges the GGNRA to reject the preferred alternative and, in its place, put-forward a pet management plan that encloses any off-leash dog play area that is permitted under the plan. If enclosures are inappropriate in a specific area, than so is an off-leash dog play area, and alternative dog recreation opportunities, such as on-leash walking, should be considered

Corr. ID: 3759 **Organization:** Wild Equity Institute
Comment ID: 204627 **Organization Type:** Unaffiliated Individual
Representative Quote: Ensuring that dog play areas are safe is not rocket science: it is a simple design problem with a basic, widely adopted solution. Safe off-leash dog play areas must be fully-enclosed with a physical barrier-and preferably all entry and exit points double-gated-to ensure the safety of park users and protect park resources.

Enclosed off-leash dog play areas ensure that our dogs do not fall off cliffs, run into traffic, or are lost while visiting the GGNRA; they ensure, when properly located, that wildlife will not be harmed or harassed by dogs; and they empower park visitors, giving them the power to choose if and when to have off-leash dog experiences by entering an enclosed area, rather than having the experience imposed upon them whenever they visit the GGNRA.

And perhaps most importantly, enclosed areas are solidly grounded in the non-impairment mandate that governs the National Park System.

Corr. ID: 4223 **Organization:** Crissy Field Dog Group
Comment ID: 208947 **Organization Type:** Unaffiliated Individual
Representative Quote: The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the

environment, not to ban the rest of us with dogs from the GGNRA. I wish that the DEIS would include an alternative along these lines.

Corr. ID: 4592 **Organization:** *Not Specified*
Comment ID: 223783 **Organization Type:** Unaffiliated Individual
Representative Quote: Provide better website information, and signage at the park.

Inform people there is off-leash dog recreation at specific parks. Although dogs are prominent at Fort Funston, one would never know that by reading the NPS website on Fort Funston. Based on the website information, a dog-phobic person would be unpleasantly surprised when he arrived at Fort Funston. By setting realistic expectations, visitor conflicts could be reduced.

Corr. ID: 4670 **Organization:** Fort Funston Dog Walkers
Comment ID: 264299 **Organization Type:** Non-Governmental
Representative Quote: Where post and cable fencing is erected, very few park users or dogs go 10' to 15' beyond the trail edge. Vegetative barriers are even more effective as a barrier to use, and when used in combination with post and cable fencing, almost no people or dogs enter the area.

Response: Fencing and natural vegetative barriers are discussed in chapter 2 of the draft plan/SEIS for the alternatives. Signage is also discussed in chapter 2. Both signage and fencing impacts have been added to the discussion in chapter 4.

Concern ID: 29687
CONCERN STATEMENT: [Loop Trails - Commenters suggest adding more loop trails both on-leash and off-leash.](#)

Representative Quote(s): **Corr. ID:** 183 **Organization:** *Not Specified*
Comment ID: 182295 **Organization Type:** Unaffiliated Individual
Representative Quote: Of particular disappointment is the fact that many of the trails designated for on- or off-leash walking do not connect or do not create loops. It would be better to have a designated series of trails from a centralized starting point (e.g. Rodeo Beach or Donahue) that can provide owners with a variety of distances and terrain to walk their dogs. I urge you to reassess the proposed dog-friendly trails.

Corr. ID: 1632 **Organization:** *Not Specified*
Comment ID: 223784 **Organization Type:** Unaffiliated Individual
Representative Quote: Ensure that all off-leash trails provide a continuous round-trip hike, eliminating arbitrary and confusing boundaries. E.g. Homestead Valley Land Trust trails should segue into GGNRA trails, Oakwood Valley should provide a sensible loop.
Protect wildlife when it needs protecting.

Corr. ID: 3934 **Organization:** 3rd Supervisorial District of the County of Marin
Comment ID: 205847 **Organization Type:** County Government
Representative Quote: 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

Response:

A discussion of loop trails has been added into chapter 2 of the draft plan/SEIS for some of the sites in the GGNRA.

Concern ID:

29688

**CONCERN
STATEMENT:**

Enforcement - Instead of reducing areas for dog walking, monitoring or enforcement of the existing and proposed rules/regulations is needed at the park. Enforcement should include issuing more citations and fines or even banning those that continue to be non-compliant with regulations. Fines should increase with each violation one person receives. Volunteers should be allowed to issue citations, should be on site to monitor and call enforcement when needed, and volunteer rescue crews could be used at Fort Funston. In addition, a tip line or reporting system should be established for visitors to report offenders.

Representative Quote(s):

Corr. ID: 63

Organization: *Not Specified*

Comment ID: 181807

Organization Type: Unaffiliated Individual

Representative Quote: Any plan that includes possible increased interaction, (ie enforcement), between park officials and dogs MUST include a comprehensive training plan and rules of engagement. This MUST include when it is acceptable to use lethal force versus pepper spray/mace or some other solution.

Corr. ID: 694

Organization: *Not Specified*

Comment ID: 182680

Organization Type: Unaffiliated Individual

Representative Quote: The current leash laws and the proposed leash laws must be enforced. Park police should ticket any dog walker with a dog off leash. Also, civilians will call to report leash violations and the violators should get heavy fines. These fines should increase (double) with each violation. First violation \$50, second \$100, third \$200, fourth \$400, fifth \$800, sixth \$1600, seventh - 2 year ban from the park and \$10,000 fine for each violation of this ban.

Corr. ID: 969

Organization: *Not Specified*

Comment ID: 191648

Organization Type: Unaffiliated Individual

Representative Quote: I support dogs on leash everywhere in the GGNRA. Dogs should not be allowed to disturb wildlife in their natural habitat. Every time I go into the GGNRA, I see dogs off leash and destroying the park. In order to enforce these rules, volunteers should be utilized to give offenders tickets. If you decide that it is not appropriate for volunteers to actually give the tickets, they can volunteer to monitor the GGNRA and call the park police to report offenders. Then the park police would give the tickets.

Corr. ID: 1850

Organization: *Not Specified*

Comment ID: 223797

Organization Type: Unaffiliated Individual

Representative Quote: ii. Provide a tip hot line for dog walkers to call in to report those chronic offenders in terms of leaving pet waste, disturbing

habitat and wildlife, etc. The Park Service personnel would be better able to focus efforts on dealing with chronic offenders.

Corr. ID: 3733 **Organization:** SF DOG, Save McLaren Park
Comment ID: 204580 **Organization Type:** Unaffiliated Individual
Representative Quote: Enforcement of already existing regulations should target irresponsible dog owners who create the few problems documented by the GGNRA, while allowing responsible dog owners to continue their traditional off-leash recreation without harassment.

Corr. ID: 3815 **Organization:** Wild Equity Institute
Comment ID: 226965 **Organization Type:** Unaffiliated Individual
Representative Quote: Repeat dog rule offenders should always be cited and chronic offender's fines should increase with the number and severity of the offense.

Corr. ID: 4043 **Organization:** *Not Specified*
Comment ID: 207320 **Organization Type:** Unaffiliated Individual
Representative Quote: Instead better compliance could be achieved through enforcement of the rules already in place. Park rangers should cite owners who do not exhibit voice control of their animal, and also those who do not clean up their dog's excrement. With the policies in place and the proper enforcement, there will be no actual or perceived threat to the natural habitats the GGNRA consist of.

Corr. ID: 4281 **Organization:** *Not Specified*
Comment ID: 264236 **Organization Type:** Unaffiliated Individual
Representative Quote: RECOMMENDATION No. 3: If the NPS selects any of the Alternatives B through E for GGNRA's 21 locations then it actively should enlist the assistance and cooperation of recognized and respected dog groups in the community to recruit responsible volunteers to participate fully in all monitoring projects in each of the 21 locations. Meaningful public participation and confirmation of the baselines and monitoring will go a long way towards achieving wide scale acceptance of the results

Corr. ID: 4584 **Organization:** *Not Specified*
Comment ID: 210021 **Organization Type:** Unaffiliated Individual
Representative Quote: A simple and effective reporting system should be established. The dog management plan should include a means by which park visitors can easily and effectively report non-compliant behavior. Park visitors are sometimes reluctant to report observed violations due to the time involved in making the report. A public reporting system should be incorporated into the plan that will be user friendly and workable. Such a system should require only a few moments of time and be an effective documentation of the violation.

Corr. ID: 4666 **Organization:** *Not Specified*
Comment ID: 227791 **Organization Type:** Unaffiliated Individual
Representative Quote: The DEIS uses the fact that dogs and people have to sometimes be rescued as a reason to limit dogs, say in the rescue attempts

can cause injuries to park law enforcement (p. 19). It does not discuss an option for allowing a volunteer rescue team to be formed that could be called first, to relieve law enforcement from this obligation. This should be discussed and explored as mitigation in the FEIS. Now that I know that it's such a burden on law enforcement, I will avoid calling them for any assistance I might need when on GGNRA lands.

Response:

Enforcement policies for the draft plan/SEIS have been added to chapter 2. 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 draft plan/SEIS. Enforcement strategies eliminated from further consideration based on feasibility include the use of volunteer law enforcement. 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. Another suggestion eliminated from consideration was an increase in fines for noncompliance. Such fines are not determined by the NPS, but are established in the Federal Magistrate Bail Schedule set by the court system.

Concern ID:

29690

**CONCERN
STATEMENT:**

Dog Size - Commenters suggest having on-leash and off-leash areas for small dogs separate from those areas containing large dogs. In addition, commenters suggested all dogs that have not been spayed or neutered should be on-leash at all times.

Representative Quote(s): **Corr. ID:** 202

Organization: *Not Specified*

Comment ID: 180621 **Organization Type:** Unaffiliated Individual

Representative Quote: The only problems I see are with dogs who have not been spayed or neutered. Perhaps a less restrictive alternative would be to require that all intact dogs be on leash on GGNRA property.

Corr. ID: 236

Organization: *Not Specified*

Comment ID: 180767 **Organization Type:** Unaffiliated Individual

Representative Quote: PLEASE like other places in the bay area and thruout the country, PLEASE PLEASE PLEASE, reserve some off leash spaces for SMALL dogs only and have them enclosed. There is no such area in san francisco.

Corr. ID: 421

Organization: *Not Specified*

Comment ID: 181604 **Organization Type:** Unaffiliated Individual

Representative Quote: Please consider an enclosed off-leash dog area, ideally with large and small dog sections, and keep the remainder of the park areas for on-leash use only. Sadly the actions of the few make off-leash dog use incompatible with high density mixed uses; no one should have fear of using the park. Yes the number of incidents is small statistically, but their impact and the cost of enforcement is great.

Response:

A discussion of ROLAs can be found in chapter 2 of the draft plan/SEIS. Although the draft plan/SEIS offers alternatives for dog walking in the GGNRA, having separate ROLAs for large and small dogs or requiring

spayed and neutered dogs on leashes is not operationally feasible in the park. However, ROLA guidelines state that dogs in heat and aggressive dogs are not allowed in ROLAs.

Concern ID: 29692
CONCERN STATEMENT: Dog Waste - Commenters suggest that the park provide dog waste bags and a means to convert dog waste to methane energy.

Representative Quote(s): **Corr. ID:** 1324 **Organization:** *Not Specified*
Comment ID: 195071 **Organization Type:** Unaffiliated Individual
Representative Quote: If the rules and expectations are clearly posted and enforced, I do not think there will be any big problems. As a suggestion, the Park Service may want to consider having trash cans and plastic doggie mitts available for pet owners to use to pick up after their dogs. San Rafael provides this service and I never see any dog "droppings" on the streets or in the grass at the parks where these mitts are available.

Corr. ID: 1696 **Organization:** *Not Specified*
Comment ID: 191111 **Organization Type:** Unaffiliated Individual
Representative Quote: People should be held responsible to the rules that already exist regarding picking up poop. Perhaps supplying more bags - biodegradable would be best - & more can would help.

Corr. ID: 2096 **Organization:** *Not Specified*
Comment ID: 193337 **Organization Type:** Unaffiliated Individual
Representative Quote: (1) Dog "Poops" in compostable bags
(2) Dispose in containers which will convert to methane = energy for power - i.e. -light posts, etc. (as done in dog park in Boston!)

Corr. ID: 2101 **Organization:** *Not Specified*
Comment ID: 193348 **Organization Type:** Unaffiliated Individual
Representative Quote: Provide public compostable poop bags in Park Areas.

Response: Dog walkers must pick up their dogs' feces immediately and dispose of them in a garbage container. At some sites in the GGNRA, dog walking groups have provided dog waste bags, but at this time it is not feasible for the GGNRA to provide dog waste bags at all sites or to participate in a program that converts dog waste to methane energy.

Concern ID: 29693
CONCERN STATEMENT: Leash Type - Commenters stated that the park should require dog walkers to carry a leash with them at all times even when walking in a ROLA. Commenters also suggested the use of electronic leashes, remote training collars, and 12-foot leashes be allowed in lieu of the 6-foot leash.

Representative Quote(s): **Corr. ID:** 458 **Organization:** *Not Specified*
Comment ID: 181732 **Organization Type:** Unaffiliated Individual
Representative Quote: Consider the leashes bring their own risks for mixed use (tripping, falling, etc) and consider technological solutions as part of this. I urge you to consider remote training collars for dogs as the equivalent

of an electronic collar that can achieve the benefits of control but allow greater freedom of movement for dogs and avoid some of the risks of leashes

Corr. ID: 4318

Organization: *Not Specified*

Comment ID: 209423 **Organization Type:** Unaffiliated Individual

Representative Quote: My suggestion is that the GGNRA require all dogs to be on-leash, but that you request a waiver from the National Park Service from the current six foot leash requirement, and allow dogs to be on leashes up to 12 feet long, to allow more freedom to dog owners and their pets. A 12 foot leash permits a dog to run a little while still being under control by their owner. I also believe that the GGNRA should designate or develop two or more fenced off-leash dog areas on GGNRA lands in Marin County and in San Francisco, much like other jurisdictions, so owners who want to run their dogs off-leash can do so in these areas. Examples of these fenced off-leash dog areas exist in Golden Gate Park and in my own town of Alameda.

Corr. ID: 4670

Organization: Fort Funston Dog Walkers

Comment ID: 264302 **Organization Type:** Non-Governmental

Representative Quote: Require all dog walkers to carry a leash and a bag for each dog. (This insures that they have the means to control and clean up after their dogs.)

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. The use of other types of leashes is also discussed in this chapter under the "Alternative Elements Eliminated from Further Consideration" section.

Concern ID:

29694

**CONCERN
STATEMENT:**

Certification/Tag System - Commenters suggested establishing a certification that would allow visitors to show that they can control their dogs under voice and sight control. Visitors proving they have control over their dogs would receive a voice control tag to attach to the dog's collar which would allow them ROLA access. Training classes should be available to teach dogs how to behave within the park. This would eliminate unruly dogs at the park. Service dogs should be registered within the park.

Representative Quote(s): **Corr. ID:** 377

Organization: *Not Specified*

Comment ID: 181163 **Organization Type:** Unaffiliated Individual

Representative Quote: I am fully supportive of an off-leash licensing program which could be run by animal control. Off leash licenses could be given to responsible dog owners. Responsible dog owners do the following: 1)license their dogs. 2) Have their dogs take all the required shots. 3)Have their dogs complete a certified (could be by animal control) obedience program. 4)Spay their dogs. 5) Dog owners could be required to carry liability insurance for their dogs. 7) Of course responsible dog owners pick up their dog waste. 6) Dog owners would have to pay a fee to NPS for the privilege of walking dogs off leash. Those who have the license to walk off leash would have to carry proof of such licensing at all times. I think this would reward responsible dog owners.

Corr. ID: 658 **Organization:** *Not Specified*
Comment ID: 181513 **Organization Type:** Unaffiliated Individual
Representative Quote: We urge that you require all dogs in areas where they are not explicitly allowed to be off-leash, to be always on-leash. If some dog owners are insistent that their animals can be fully controlled by voice commands, they should be required to demonstrate this by testing, under realistic conditions. (The owners of dogs should bear the full cost of the tests, and dogs that pass should be required to carry some form of identification, renewable annually for a fee.) The going-in assumption should be that voice-control does not work unless contrary proof is provided.

Corr. ID: 753 **Organization:** *Not Specified*
Comment ID: 223798 **Organization Type:** Unaffiliated Individual
Representative Quote: implement a voice control recall policy based on the honor system. (dog owners watch a short video online or at a local library, nps kiosk, station, city hall portraying voice control protocols). owners watch the video, agree that their dog abides by the recall system protocol, and pays annual fee (video will have to be watch annually before registration can be completed and fees paid) . dogs would be required to wear a voice control tag in addition to rabies and animal license or a citation, warning or actual will be given. boulder, colorado has a voice control/recall video and the program has been successful.

Corr. ID: 913 **Organization:** *Not Specified*
Comment ID: 191323 **Organization Type:** Unaffiliated Individual
Representative Quote: Another option would be to enforce dog licensing, and even charging an additional fee for screening dogs'/owners' behavior before issuing a "national park license", which could be required for use of these areas. I am a dog trainer and a psychiatrist and have been interested in developing guidelines for licensing service animals (particularly the largely unregulated "psychiatric service animal"). Something like this would also make sense for National Park use, charging a fee for a training session that would notify the dog owners of the rules and help ensure that they are followed, which would also weed out a lot of the destructive dogs and dog owners, who would be ticketed if they did not have their "national park license".

Corr. ID: 1493 **Organization:** *Not Specified*
Comment ID: 191301 **Organization Type:** Unaffiliated Individual
Representative Quote: Over the last few months I have had several encounters with able-bodied hikers on the main Tennessee Valley trail that claimed that their pets were "service animals" or therapy dogs and therefore, permitted on the trail. I am aware that service animals exist for disabilities other than visual or hearing impairment. However, there seems to be no system to prevent persons from abusing the privilege and claiming that any old mutt is a "service animal."

Disabled persons requesting special parking accommodations are required to register with the DMV after obtaining written verification of need from their physician. They must then display the special blue hangtag to utilize the

special parking areas. It seems that a similar system of registration with physician verified need could be adapted for service animals. Once registered, the animal could wear a special jacket or leash that clearly identifies the animal as a service animal. Such identification of these animals would relieve the disabled person from the burden of having to justify the presence of their dog in a restricted area. It would also prevent non-disabled dog owners from thinking that it really is ok to have their pet there despite what the signs say.

Please consider implementation of a program to register and identify service animals in the GGNRA. If that is not possible, then consider posting signage defining acceptable service animals (ADA definition) and that it is illegal to misrepresent an animal as a service animal

Corr. ID: 1850 **Organization:** *Not Specified*
Comment ID: 192067 **Organization Type:** Unaffiliated Individual
Representative Quote: Comment: The Compliance-Based Management Strategy should be removed from the DEIS. It should be replaced with a strategy that rewards responsible dog walkers and bans irresponsible dog walkers, as follows:

i. Set up a permit/color tag system that would be partnered with local Animal Care and Control Departments. Dogs that have licenses from local ACC could be issued a permit, renewable annually, to walk in GGNRA sites. A small fee could be charged to help pay for processing. This would help with getting dogs licensed locally and support GGNRA efforts as well. A brightly colored collar tag for dog and ID for owner could be provided and required for visits to GGNRA. Only dogs/dog walkers with these permits would be able to use off leash play areas, as well as on leash areas. Dog walkers/dogs visiting for one day could obtain one day only permit from Gift Shops and Ranger Stations with different color tag allowing them on leash only access to GGNRA sites. Failure to observe restrictions would result in loss of permit for dog walking in GGNRA.

Corr. ID: 2229 **Organization:** *Not Specified*
Comment ID: 200841 **Organization Type:** Unaffiliated Individual
Representative Quote: Rather than spend so much \$ to enforce and create the amended off leash areas, why not educate and ensure that people have well trained dogs? For dogs to be off leash anywhere at any time, they should have a rocket recall. If you call them, they will come away or off of something ie. people, picnics, flora and fauna and back to you.

In addition to a dog license, dogs can be issued a tag which indicates that have passed a Canine Good Citizen test, which means the dog/human have been trained/passed a number of tests to ensure appropriate behavior in public. This would make for better managed, happier dogs and a happier community.

Response:

Please see chapter 2, "Alternative Elements Eliminated from Further Consideration" for information certification and tag programs.

Concern ID:
CONCERN
STATEMENT:

29695

Additional Alternatives - Commenters have suggested a new alternative which balances the recreational needs of the Bay Area with the protection of natural resources, and/or adds more on-leash and off-leash areas for dogs. The A alternative would include the 1979 Policy, with enforcement, and the addition of more dog walking areas. Other suggestions include generally allowing for more off-leash access and off-leash hiking opportunities.

Representative Quote(s): **Corr. ID:** 1002

Organization: *Not Specified*

Comment ID: 191731

Organization Type: Unaffiliated Individual

Representative Quote: I believe that the GGNRA is not truly taking into account what an off leash site means to dog owners. I am including what I think should be down. I do not agree with this plan at all!

The GGNRA should develop a new alternative, the A+ Alternative, that will better balance the recreational needs of the Bay Area with protection of natural resources. The DEIS calls the "No Change" Alternative "A". This is the 1979 Pet Policy with some restrictions, particularly restrictions on off-leash at Ocean Beach, Fort Funston, and Crissy Field because of the snowy plover and native plant restorations. More than one-third of Bay Area residents have dogs and we now know the importance of off-leash recreation for dog's physical and mental health, as well as the importance of the significant social communities that develop where people recreate with their dogs off-leash. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and education where problems arise. Enforcement of already existing regulations should target irresponsible dog owners who create the few problems documented by the GGNRA, while allowing responsible dog owners to continue their traditional off-leash recreation without harassment.

Corr. ID: 2213

Organization: *Not Specified*

Comment ID: 200741

Organization Type: Unaffiliated Individual

Representative Quote: Currently less than 1% of the GGNRA allows off-leash recreation, and now the GGNRA wants to reduce that even further. Is it too much to ask that we retain the usage of this small amount of space as it has been for many, many years? I propose the GGNRA should develop a NEW alternative, that would not only KEEP the current areas off-leash, but also lead to development of ADDITIONAL off-leash areas in new land obtained by the GGNRA. The GGNRA should be expanding not reducing off-leash locations.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 200887 **Organization Type:** Non-Governmental
Representative Quote: The considerations in the Dog Management Plan are not fairly balanced, in that both Marin and San Francisco GGNRA counties have had off-leash dog walking areas as part of the 1979 Pet Policy. San Mateo county needs to be considered for discussion and inclusion for off-leash areas of dog walking as part of the DEIS Dog Management Plan now underway. There is a need for off-leash areas in San Mateo county as well as the other two counties in the GGNRA.

Corr. ID: 4443 **Organization:** San Francisco Dog Owners Group
Comment ID: 264252 **Organization Type:** Non-Governmental
Representative Quote: SFDOG encourages the development of an A+ Alternative, one that is based on the 1979 Pet Policy, and that returns the plover restriction areas to off-leash access (given the DEIS' failure to prove any impact by dogs on plover populations or survival). In addition, areas in San Mateo that were not part of the 1979 Pet Policy but where off- and on-leash recreation has traditionally occurred, such as Sweeney Ridge, must allow that off- and on-leash recreation to continue. Similarly, off- and on-leash should be considered for all areas that become part of the GGNRA in the future, such as Rancho Corral de Tierra, especially where off- and on-leash recreation have traditionally been enjoyed.

Corr. ID: 4670 **Organization:** Fort Funston Dog Walkers
Comment ID: 264298 **Organization Type:** Non-Governmental
Representative Quote: From the beginning of the dog management controversy (at the inception of the GGNRA when off-leash walking was initially banned) and at every meeting with the Park Service (including almost 2 years of negotiated rulemaking), dog owners have tried to make it clear that we want a recreational experience. Dog play areas (small, fenced areas where owners drink coffee while they watch their dogs play) are not what we have asked for. Dog owners are asking for recreational opportunities; places to hike; the opportunity to be in nature ' with their well-behaved dogs.

Response:

The alternatives have been revised to include additional 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 do not meet the purpose and need, particularly the goals of protecting park resources and increasing the safety of visitors, this alternative is more restrictive than the 1979 Policy. Please see chapter 2 for additional details on changes to alternatives.

Concern ID:
CONCERN
STATEMENT:

30111
[Time/Seasonal Restrictions - Commenters suggest requiring time restrictions throughout the park for when ROLAs, on-leash dog walking, and no dog walking would be allowed. Time restrictions could be based on week vs. weekday hours, season hours, or hours for morning and night use. Seasonal restrictions could also be implemented.](#)

Representative Quote(s): **Corr. ID:** 332 **Organization:** *Not Specified*
Comment ID: 181097 **Organization Type:** Unaffiliated Individual
Representative Quote: I have been using crissy field for the last two years with my dog. I have always been respectful and so have the members of the community that I see at crissy field. The best thing to do is license the dogs for off-leash use and fine those that are not license.

Corr. ID: 1227 **Organization:** California Parks Association
Comment ID: 194877 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs allowed only before 10 A.M. and after 5 P.M.

Corr. ID: 1277 **Organization:** *Not Specified*
Comment ID: 195001 **Organization Type:** Unaffiliated Individual
Representative Quote: We want part of the beaches to be off leash every day. I am open to the dogs being leashed at certain times (like peak use times) and say between 8am to 11am it is off leash. 11am to 5pm on leash and 5-7 off leash.

Corr. ID: 1574 **Organization:** *Not Specified*
Comment ID: 190788 **Organization Type:** Unaffiliated Individual
Representative Quote: 10-E seems logical (Crissy Field)
It is preferable to have off leash time limits on East Beach:
Before 9: AM
After 5: PM

Dogs should NOT allowed in Wildlife Protection Area (WPA)

Corr. ID: 2685 **Organization:** Neighbor
Comment ID: 195485 **Organization Type:** Unaffiliated Individual
Representative Quote: I understand there are a few relatively warm, relatively windless days each year when sunbathers (not many swimmers!) like to use East Beach - and yes, I appreciate that a sunbather may occasionally be slightly inconvenienced by a discourteous dog and/or host. For these rare days (in my experience, only 4-5/year), the GGNRA could easily implement a temporary restriction on off-leash dogs on East Beach and redirect their hosts to the beach west of the lagoon's outlet.

Corr. ID: 2813 **Organization:** *Not Specified*
Comment ID: 201115 **Organization Type:** Unaffiliated Individual
Representative Quote: Crowding will create problems
The Preferred Alternative at Crissy Field, by eliminating dogs from the East Beach particularly during weekday hours, and the airfield also largely empty during the week, will force greater interaction between a greater number of dogs and their owners (especially during high tides) in a much smaller area. One reason that there are relatively few problems with dog aggression is that there is enough space at Crissy for everyone to interact when they wish to and not because density has been forced on them. Solution: Make the East Beach and parts of the Airfield off limits between 10 to 4 on weekends. Allow full use during the week.

Corr. ID: 2941 **Organization:** *Not Specified*
Comment ID: 202408 **Organization Type:** Unaffiliated Individual
Representative Quote: My 1st concern is that most people do not use the areas at all times and therefore there are periods of the day and week off-leash dog walking could be allowed and should not be banned for ALL periods. Currently, I walk my dog several times a week in the GGNRA. I often do this at non-peak times in the evenings during daylight savings at Land's End and on Friday Morning at Chrissy field. Often times, my dog and I are the only users or of the few users of these places.

Response: The park's experience with time restrictions is that they cause confusion among visitors and are difficult to enforce. Also, the times when visitor numbers are low (early am or late pm) are generally the times when wildlife numbers are higher. Therefore, time of day/day of week restrictions is not a preferred approach; however, this management concept will still remain an option for dog management in the future. For more information, please see chapter 2, "Alternative Elements Eliminated from Further Consideration" section.

Concern ID: 31337
CONCERN STATEMENT: Split the beaches - Commenters suggested that half of the beaches in the plan be set up for those who enjoy dogs, and half be set up for those who do not like dogs.

Representative Quote(s): **Corr. ID:** 2056 **Organization:** *Not Specified*
Comment ID: 193310 **Organization Type:** Unaffiliated Individual
Representative Quote: This is an all or nothing plan. Why not just dedicate 1/2 the beaches to those scared of dogs and 1/2 the beaches to dog lovers? - or drop this plan all together –

Response: The preferred alternative includes beach areas offering varying visitor experiences: areas for dogs on leash, off leash, and areas with no dogs. Under the preferred alternative, sections of the beach at Rodeo Beach, Crissy Field, Ocean Beach, and Fort Funston would include ROLAs and other beaches - or sections of beaches - in Marin and San Francisco would allow on-leash dog walking. Please see chapter 2 for more details on ROLAs.

Concern ID: 31533
CONCERN STATEMENT: Commenters requested that people with disabilities be allowed to have well-behaved dogs under voice control on any trail that allows on-leash dogs.

Representative Quote(s): **Corr. ID:** 4660 **Organization:** *Not Specified*
Comment ID: 227441 **Organization Type:** Unaffiliated Individual
Representative Quote: Provide special compensations for people with disabilities by allowing them to have well- behaved, voice control dogs on any trail that allows on-leash dogs

Response: A discussion of service animals has been added to chapter 2. 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 ADA, service animals must be harnessed, leashed, or tethered, unless these devices interfere with the service animal's work or the individual's disability prevents using these devices. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls (US Department of Justice 2010). (http://www.ada.gov/service_animals_2010.htm)

The NPS is currently revising its regulations to be consistent with Department of Justice regulations covering the ADA (28 CFR 36).

Concern ID:

31772

CONCERN

[The alternatives that have been dismissed should be reconsidered.](#)

STATEMENT:

Representative Quote(s):

Corr. ID: 4035

Organization: *Not Specified*

Comment ID: 227704

Organization Type: Unaffiliated Individual

Representative Quote: All "Alternatives Suggested and Dismissed from Consideration" need to be re-evaluated considering the recreational value of the park, valid scientific monitoring and measurement of incremental impacts from dog recreation, and the recognition that some impacts are justified to support the recreational mandate and to maintain recreational opportunities for this and future generations.

Response:

Some elements of the alternatives considered but dismissed were reconsidered as options that may be implemented for dog management in the future. However, alternatives eliminated from further consideration were considered and evaluated in-depth during the initial alternatives development process and were eliminated because they do not meet the needs or objectives for the proposed project, as outlined in chapter 2, "Alternative Elements Eliminated from Further Consideration."

Concern ID:

41743

CONCERN

[Commenters suggest that if the draft plan/EIS will be implemented, that the changes go into effect after a grace period \(14 years, the average life span of a dog\).](#)

STATEMENT:

Representative Quote(s):

Corr. ID: 3996

Organization: Private citizen

Comment ID: 207475

Organization Type: Unaffiliated Individual

Representative Quote: As a responsible, working, tax-paying San Francisco resident and dog-owner I am writing to oppose the GGNRA's draft dog management plan.

In particular, it was the 1979 Pet Policy where the city of San Francisco gave much of the land to the GGNRA with the express purpose that it would be used as it had been historically for recreational purposes, which includes dog walking that ultimately tipped the scale in favor of us getting our dog.

We are positively behind the idea of establishing professional dog walker rules and fees.

If off-leash areas are taken away we really may have to consider leaving the city of San Francisco now that we own and are responsible for the well-being of a large, energetic dog.. At the VERY least, I feel it would only be fair, if restrictions are to be imposed, that they go into effect after a 14 year grace period, allowing any new dog owner the current rules for the lifetime of an average dog. I'm not sure we would have made the decision to own a dog if it weren't for the current Pet Policy.

Response:

Once the dog management plan is implemented, a long-term public outreach education period would be established. It is anticipated that there would be an intense education effort when the plan/EIS is first implemented. Details are described in chapter 2, Elements Common to Action Alternatives, Outreach and Education. For example, starting with the implementation of the plan/EIS, months 1-3 will be a public education period, and in months 3-6 the monitoring strategy will be tested. During months 6-18, a baseline of numbers and rates of visitors with and without dogs, numbers of dogs per visitor, type of use (on-leash or voice-control) and noncompliance with regulations (includes noncompliance observed but not resulting in citations) will be established.

A long-delayed implementation would not meet the purpose and need of the draft plan/SEIS.

AL5000 – COMMENTS ON DOG WALKING PERMIT SYSTEM

Concern ID:

29674

**CONCERN
STATEMENT:**

Commenters felt that altering the existing regulations and permitting requirements for commercial dog walkers is unnecessary and difficult to implement and would be hard to ensure compliance. Some commenters felt that the implementation of the new plan would not solve any current issues that may exist, and would result in an outcome that would aggravate the negative impacts of dog walkers in the parks.

Representative Quote(s): **Corr. ID:** 1104

Organization: *Not Specified*

Comment ID: 192288 **Organization Type:** Unaffiliated Individual

Representative Quote: I am deeply disappointed by this effort to severely curtail off leash dog walking areas by the GGNRA. If the GNNRA draft dog management plan is passed, there will be a number of serious negative impacts... 1. My dog walker, although he does not go to the beaches on a work day basis, will be directly impacted because the many dog walkers who do take their clients to the beach will no longer be able to do so, and will therefore go to the already limited enclosed dog park areas. As a result, his normal parks will become overcrowded. 2. My local dog park area will become increasingly overcrowded, thus increasing the likelihood of an possible incident, as well as noise and management difficulties. 3. If there are limitations of 3 dogs/dogwalker, walkers will be forced to limit their time and schedule with their clients. As a result, each dog will receive less time outdoors, and possibly be scheduled at increasingly unreasonable times. This will lead to less exercised, more neurotic dogs in the neighborhood, and will be detrimental to everyone.

Corr. ID: 1598 **Organization:** *Not Specified*
Comment ID: 190834 **Organization Type:** Unaffiliated Individual
Representative Quote: I walk with dogs and I am a dog walker. The happiest time in our day is when the dogs & I are recreating and playing at the beach and GGNRA! Without our park area- we would not have exercised- socialized mellow dogs. We are a true community of people who live for our dogs. To limit the amount of dogs would take way my livelihood and people rely on me to care for their loving pets when they work or travel. We are wondering why you must take back what you gave to us and why put a limit when all is going just fine for the last 15 years.

Corr. ID: 1621 **Organization:** *Not Specified*
Comment ID: 190865 **Organization Type:** Unaffiliated Individual
Representative Quote: The regulation of dog pack numbers will not decrease traffic at the Parks. It will only encourage more dog walkers doing more walks per day, not to mention the dog owners that cannot afford to have their dogs walked professionally. This, I believe, will lead to dirtier parks and more chaos and confrontation than less.

Corr. ID: 2104 **Organization:** *Not Specified*
Comment ID: 193359 **Organization Type:** Unaffiliated Individual
Representative Quote: If you are going to enforce leash laws why not just enforce the more narrow laws we have now. Increase fines for not picking up after dog. Enforce walker license laws & restrictions on # of dogs they can take.

Corr. ID: 2108 **Organization:** *Not Specified*
Comment ID: 193368 **Organization Type:** Unaffiliated Individual
Representative Quote: Rules + regulations that are already in place should be enforced (as a helpful solution) instead of curtailing use to all- mostly responsible - people. I am a dogwalker + I am for requiring permits, requiring picking up poop & dog behavior management.

Corr. ID: 4017 **Organization:** *Not Specified*
Comment ID: 206851 **Organization Type:** Unaffiliated Individual
Representative Quote: I am in favor of any plan which:
Contains no restrictions or permits for dog walking within the GGNRA. This would require too much management and would be difficult for visitors to comply with.

Response:

There are currently no regulations or permit requirements for commercial dog walking; that need must be addressed by the Dog Management Plan. It is necessary to limit the number of dogs per walker for both commercial and recreational dog walkers in order to ensure safe and controlled conditions at each park site. The permit limit of six dogs per walker was developed initially by the Negotiated Rulemaking Committee and is in line with limits at many Bay Area and national land management agencies. 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. For details on the permit system, please see chapter 2, Permits for More Than Three Dogs - Commercial and Individual Dog Walkers and Appendix F.

Concern ID:
CONCERN
STATEMENT:

29675

Commenters suggest that professional dog walkers should have a license/permit/fee/certification/identification and/or be regulated for walking dogs at GGNRA. This use fee could be implemented through daily permits, monthly permits, or yearly permits. Amounts suggested ranged from a small daily fee to several thousand dollars for commercial dog walkers. This would help raise revenue for enforcement and maintenance. Commercial dog walkers should also be required to be registered, insured, and bonded if using the park for their services. Other suggestions included having all appropriate shots and other city requirements, take a dog training or obedience class, a class on dog walking and park education, and tests for voice control proficiency. It was suggested that commercial dog walking is a business and needs to be regulated in the same manner as other vendors in the park, including taxation and fees.

Representative Quote(s): **Corr. ID:** 321

Organization: *Not Specified*

Comment ID: 181079 **Organization Type:** Unaffiliated Individual

Representative Quote: I agree with the fact that as professionals we need to be licensed and regulated. Although I think that 8 off leash dog per licensed professional is a little more reasonable, I am comfortable with the 6 dog limit. I feel it is imperative that we be able to use Fort Funston in the way that we are now. It is a huge open space and that makes it more manageable and safe for walking a pack of dogs. Why can't we as professionals pay a fee to use the park? That way the funds can be used to maintain the trails better, etc.

Corr. ID: 631

Organization: *Not Specified*

Comment ID: 182497 **Organization Type:** Unaffiliated Individual

Representative Quote: Finally commercial dog walkers should be required to have a permit (\$500/month) to walk dogs in the GGNRA. They should also be required to wear identifying clothes such as a shirt with the dog walking company name or their own name if they are self-employed.

Corr. ID: 694

Organization: *Not Specified*

Comment ID: 182682 **Organization Type:** Unaffiliated Individual

Representative Quote: All professional dog walkers should be required to have a permit to walk their dogs off leash or on leash. They must pay per dog. If they wish to get a permit to walk 2 dogs this means they pay \$3,455x2 a year. If they wish to walk 4 dogs (should be the max), this means they pay \$3,455x4 a year. Could consider increasing the cost given that they are a business. Also if the park decides that they want to let commercial dog walkers have more than 4 dogs, the cost for each additional dog over 4 should be \$4982 an extra dog.

Corr. ID: 4070

Organization: Mar Vista Stables

Comment ID: 207680 **Organization Type:** Unaffiliated Individual

Representative Quote: 2)Commercial Dog Walking-On most public lands, any commercial entity making money off of use of those lands usually has to pay a permit or lease fee to the agency responsible for those lands (BLM-OHV races, Livestock grazing, mining, etc.; US Bureau of Reclamation-houseboat rentals, jet ski rentals, marinas, campsites, etc.). It seems that an entity bringing multiple dogs to NPS lands and making money off of that

without having to assist in the upkeep of that area (financially or otherwise) is unfair to the rest of the general public using those lands and strains agency resources. This should be a general requirement on commercial dog walking in all GGNRA lands for all Alternatives (including the No Action alternative).

Corr. ID: 4408

Organization: *Not Specified*

Comment ID: 206411 **Organization Type:** Unaffiliated Individual

Representative Quote: In my opinion, commercial dog walkers need to be licensed, and should pay a business tax. I know that this is being considered by the supervisors in SF. They should be able to walk only a limited number of dogs. In my opinion, I think 6 dogs should be a maximum. (Picture trying to pick up the dog waste from 10 dogs.) Looking on the web, commercial dog walkers in San Francisco charge between \$350 to almost \$400 per month for walking one dog on weekdays (20 clients at \$370 per month = \$89,000/yr). Food trucks in our public parks in SF pay for being there. It seems that dog walkers using our public spaces for their businesses should also.

Corr. ID: 4408

Organization: *Not Specified*

Comment ID: 206413 **Organization Type:** Unaffiliated Individual

Representative Quote: One way to control commercial dog walkers at Fort Funston would be to designate a small number of parking places for them in the parking lot, parking places with an hour time limit. Their vehicles should have an identifying bumper sticker that can be checked against their license plate and the dog walkers themselves could wear an ID tag. Once again I do not feel that they belong there, but if they are to be there and have dogs off-leash, they should do so in a fenced area. Landscaping with natives could help to disguise the fence. Enforcement would be easier and dogs would not be lost. Commercial dog walkers do lose dogs. The majority of people who come to the GGNRA without dogs could then have a dog-free experience in a national park.

Corr. ID: 4642

Organization: *Not Specified*

Comment ID: 208836 **Organization Type:** Unaffiliated Individual

Representative Quote: Proposal for Permitted Off Leash Dog Access Within Selected Areas of GGNRA

1. Individuals would obtain an annual permit that would allow them to have up to three dogs off leash in the areas of GGNRA where ROLA is currently allowed.
2. Obtaining a permit would require demonstration of acceptable voice control for at least one dog and payment of an annual fee (\$100 suggested). This fee would offset the permitting process as well as support the trail maintenance in GGNRA.
3. Demonstration of acceptable voice control would require that the applicant be able to call their dog away from two leashed stranger dogs before contact has occurred. This "test" could be performed by licensed pet dog trainers or other professionals designated by GGNRA.
4. Those individuals who have obtained an off leash permit would be required, when accompanied by their off-leash dogs, to wear a nylon vest issued by GGNRA. This vest would have a large identification number that could be noted by others on the trails.

5. An infraction of off-leash rules (unwanted dog or human interaction, not picking up after their dog) would be grounds for a significant fine and/or suspension of the permit. Note that infractions could be reported by anyone on the trail, not requiring the presence of a Park Ranger.

This policy would have a number of positive consequences, including:

1. Continued access by those individuals able to demonstrate standards of responsible dog ownership
2. Ability to hold permitted individuals accountable for their dog's behavior without the need for patrolling by Rangers.
3. Encouraging awareness, training and control of dogs by those wishing to obtain a permit
4. Financial support for trails and park maintenance by those who actively use the parks and who have a vested interest in their welfare.

Response:

Commercial and recreational dog walkers with more than 3 dogs would be required to obtain a permit for a fee. Please see Appendix F for details on Special Use Permits. Both commercial and recreational dog walkers would be required to demonstrate having their dogs under voice and sight control when requested by law enforcement, as discussed in chapter 2, Areas Open to Dog Walking. In addition all dogs must be licensed. See Appendix E for dog walking requirements both in ROLAs and on-leash areas.

Concern ID:
CONCERN
STATEMENT:

29678

Change in Number of Dogs - some commenters suggest increasing the number of dogs for commercial dog walkers; the proposed limitations will negatively impact the income of dog walkers, who depend on this as their livelihood. Other commenters suggest decreasing the number of dogs for commercial dog walkers; the proposed restrictions would not provide adequate protection of resources or result in changes to current issues. Another option suggested was that the size of the dog should be factored into the number of dogs allowed.

Representative Quote(s): **Corr. ID:** 58

Organization: Tailblazers Dog Walking & Pet Services

Comment ID: 181791 **Organization Type:** Unaffiliated Individual

Representative Quote: I do, however, NOT agree to limiting dog walkers to 6 dogs. If we have to pay for a permit, we should at least be legal at 8 dogs. There essentially putting a cap on what we can make. I'll lose well over \$30K per year with this change.

Corr. ID: 928

Organization: *Not Specified*

Comment ID: 191387 **Organization Type:** Unaffiliated Individual

Representative Quote: Also, there should be a limit of 3 (or 2) dogs per person, or even different rules based on size (consider the relative impact of two 15-pound dogs as compared to two fifty-pound dogs). It is not appropriate for the Park Service to create commercial permits for professional dog walkers. The laxer the GGNRA and other agencies are about the numbers of dogs per walker, the more people are encouraged to bring multiple dogs.

Corr. ID: 1052 **Organization:** *Not Specified*
Comment ID: 192136 **Organization Type:** Unaffiliated Individual
Representative Quote: There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time.

Professional pet service activities should be done in places with guidelines in place for this kind of work. A public park should be a safe space for people first, not one dominated by professional service activities.

Corr. ID: 1607 **Organization:** *Not Specified*
Comment ID: 190847 **Organization Type:** Unaffiliated Individual
Representative Quote: As a professional dog walker I am happy to apply for a permit and am in favor of some regulation! But please reconsider the number of dogs to 8 at the very least. It would be economically unfeasible to stay in business walking only 6 dogs.

Also, please allow us to walk from the parking lot to the beach with the dogs off-leash. There is no way we could safely walk to the beach with all the dogs on leash.

Corr. ID: 1611 **Organization:** *Not Specified*
Comment ID: 190851 **Organization Type:** Unaffiliated Individual
Representative Quote: -Puts an unfair burden monetarily on dog walkers and those that own more than 3 dogs.

-Your commercial dog walking Alternatives will put a lot of people out of work - IE- 6 dog limit. This will impact the local economy- which I see is not noted anywhere

Corr. ID: 1829 **Organization:** *Not Specified*
Comment ID: 191953 **Organization Type:** Unaffiliated Individual
Representative Quote: The idea of dog walkers having 6 dogs "under control" even on leashes is an illusion, and of course the excrement left in their wake is a detriment to the environment, not to mention an annoyance to non-dog owning walkers who follow.
Please tighten up on the restrictions for dog owners and dog walkers in the GGNRA.

Corr. ID: 2888 **Organization:** *Not Specified*
Comment ID: 202946 **Organization Type:** Unaffiliated Individual
Representative Quote: 7. Per dogs off-leash numbers and access:
a. Please put an 8 dog total limit for dog-walkers into effect. I also support 6 dogs off leash max for two reasons. First, is the poop pick-up factor. It is so easy, and I also see it almost daily, to miss some poop with more than 6 dogs off leash. secondly is the transportation factor. I see far too many pick-up trucks jammed full of precious pooches. This is one of the personal preference and responsibility angles vs, profit potential that many dog-walkers are unabashed about when they sacrifice safety for dollars. Limiting the max-number of dogs will at first deeply disappoint and possibly infuriate

some singular dog-walkers and dog-walking companies, but the larger benefit of safety, park flow, and management will create a more cohesive community where everyone understands expectations and decorum.

Corr. ID: 4584 **Organization:** *Not Specified*
Comment ID: 210018 **Organization Type:** Unaffiliated Individual
Representative Quote: Park visitors should be limited to one dog per visitor. On trails, visitors with more than one dog have a wider space requirement and have the potential to impact other park visitors by impeding their progress along the trail. In ROLAs, it is not practical to allow voice control of more than one dog per person. With few exceptions, dog handlers are not capable of managing more than one off-leash dog at a time.

Response: There will be no change to the number of dogs allowed for both commercial and recreational dog walkers. 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. Commercial dog walking is also allowed only at seven ROLAs. Please see chapter 2, Permits for More Than Three Dogs - Commercial and Individual Dog Walkers for more detail.

Concern ID: 29681
CONCERN STATEMENT: [Restrictions to commercial dog walkers should be aligned with the local city and county regulations, rather than with separate regulations implemented by the Park Service.](#)

Representative Quote(s): **Corr. ID:** 3219 **Organization:** Portuguese Water Dog Club of Northern California
Comment ID: 226943 **Organization Type:** Unaffiliated Individual

Representative Quote: * Enable professional dog walking and align any professional dog walking rules with county or city regulations.

Corr. ID: 3931 **Organization:** The Whole Pet
Comment ID: 205808 **Organization Type:** Unaffiliated Individual
Representative Quote: Regarding professional dog walkers, San Francisco Animal Care & Control already has an existing list of guidelines for professional dog walkers in terms of the maximum number of dogs per walker, maintaining voice control or leashes, scooping poop, preventing digging & chasing etc. Most responsible dog walkers have already voluntarily agreed to follow these guidelines & are in favor of regulation, but there is not enough education or enforcement about these policies either.

Response: NPS is not required to maintain the same regulations as city and county parks; however, consistency with other adjacent areas was a consideration in development of number of dogs allowed. Most Bay Area, and many national, land management agencies, including Marin County, 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. Please see chapter 2, Permits for More Than Three Dogs - Commercial and Individual Dog Walkers for more detail.

AT1300 – ALTA TRAIL: DESIRE OTHER ALTERNATIVE

Concern ID: 29726
CONCERN STATEMENT: Alternative D should be chosen at Alta Trail.
For representative quotes, please see Concern 29551 (FB1300), Comment 29551.

Response: Alternative D was not selected as the preferred alternative for Alta Trail. The preferred alternative for the Alta Trail site provides dog walking opportunities to visitors while being protective of mission blue butterfly habitat. On-leash dog walking would be required which would prohibit dogs from entering into the mission blue butterfly habitat and would be protective of other user groups. In addition, Alta Trail is frequently used by dog walkers, so this visitor experience would be allowed to continue. Please see chapter 2, Preferred Alternative for Alta Trail for additional rationale.

AT1400 – ALTA TRAIL: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29727
CONCERN STATEMENT: Commenters suggested a plan that connects Oakwood Valley Fire Road with Alta Trail to better accommodate more users by the creation of a loop. A longer, more vigorous loop would allow for more exercise for both humans and dogs.
For representative quotes, please see Concern 29241 (OV1400), Comment 193288.

Response: GGNRA has changed the preferred alternative to extend the on-leash dog walking opportunity on the Alta Trail to provide a connection to the Oakwood Valley Trail; however, a full loop trail out and back to the start of Oakwood Valley is not feasible. Please see chapter 2, Preferred Alternative for Alta Trail for additional rationale.

Concern ID: 29728
CONCERN STATEMENT: Have commercial dog walkers limited to six dogs off leash on Alta. Otherwise other areas of the county will be affected.

Representative Quote(s): **Corr. ID:** 2126 **Organization:** *Not Specified*
Comment ID: 193410 **Organization Type:** Unaffiliated Individual
Representative Quote: Alta --> make commercial dog walkers permitted to 6 dogs off-leash. Otherwise the proposed regulation will push this to another area (of the county, etc).

Response: Alta Trail would be one of the locations where permits would allow commercial or private dog walkers to have up to six dogs; however, the dogs would have to be on leash. No off-leash dogs would be allowed in order to protect adjacent mission blue butterfly habitat and visitor safety.

Concern ID: 29729
CONCERN STATEMENT: More education, better signage, and more fencing could improve the Alta area for humans, dogs, and the mission blue butterfly. The current signage and restrictions are mostly followed, and any problems could be addressed by more signage or better fencing.

Representative Quote(s): **Corr. ID:** 3215 **Organization:** *Not Specified*
Comment ID: 202570 **Organization Type:** Unaffiliated Individual
Representative Quote: Another loop of key importance to our neighborhood is accessed through the Fernwood Cemetary and comes out at the fire road near the water tank on the Alta trail. This historically has been a great source for walking dogs off leash along the Alta trail and then connecting to the upper portion of the Oakwood Valley Trail, then continuing down through Oakwood Valley fire road and out to Tennessee Valley for the return.. This longer, more vigorous loop is ideal for getting good exercise for both humans and dogs. It is consistently used, but I would not say it is overused. I am aware there is Mission Blue butterfly habitat along a stretch of the Alta trail and it is marked off and signed. Most people respect and pay attention to this. Perhaps a few don't. Again, education, better signage and perhaps more fencing could improve this for both humans and dogs and the butterfly. But in my 25+ years of experience walking these trails, I haven't seen any negative impact from dogs on lupine plants in this area. I have seen negative impacts from humans, and certainly from Scotch Broom. Is there any true science that shows negative impact from dogs in this area? Or is the impact from other sources?

My main concern is with the closing of these two key loops in the Oakwood Valley area. I highly recommend that these important loops be kept open and available to people with dogs. I have not seen any evidence in the DEIS that shows why these areas should not be open to dogs as currently used.

Response: A trail connecting Alta Trail to the Fernwood Cemetery would cross private property outside the GGNRA boundary, thus not under GGNRA management. As to protecting mission blue butterfly habitat, fencing would be installed at Alta Trail on an as-needed basis. Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

AW1000 – ANIMAL WELFARE: IMPACT ON/TO DOGS

Concern ID: 29709
CONCERN STATEMENT: Commenters oppose off-leash restrictions because their dog will not be able to enjoy the park the same if leashes are required or if fenced-in play is the only option (which is sometimes stressful for dogs), as leashing dogs can result in aggressive behavior in dogs. Additionally, restricting off-leash areas at GGNRA will cause overcrowding of other dog parks and a negative or unsafe experience for their dog(s). Commenters support off-leash areas because these areas afford greater mental and/or physical health for their dogs, and provide for socialization or better behavior (vs. on-leash requirements). These areas also provide adequate exercise opportunities that cannot be obtained on leash.

Representative Quote(s): **Corr. ID:** 989

Organization: *Not Specified*

Comment ID: 191704 **Organization Type:** Unaffiliated Individual

Representative Quote: In recent years I have been struck by how fewer and fewer areas in the Bay Area are being made available for off-leash dogs. It has been proven that dogs that receive proper exercise and socialization with other dogs are better behaved, happier, healthier and bring greater joy to the lives of the people that own and love them. Restricting more areas from being off-leash will directly infringe upon this. Dogs need vigorous exercise. Walking alongside an owner while tethered to a leash is not adequate exercise by any reasonable definition. Additionally, dogs need to interact with other dogs and other people to remain well-socialized. By removing more and more opportunities for dogs to exercise properly and be socially acclimated to other dogs and other people breeds a vicious cycle that results in dog "events" such as fights or bites. Ironically, a plan to remove off-leash areas due, in part, in an attempt to reduce dog events such as a fight or bite will only ensure more such events.

Corr. ID: 1114

Organization: *Not Specified*

Comment ID: 192354 **Organization Type:** Unaffiliated Individual

Representative Quote: Dogs require sufficient levels of physical exercise and socialization in their daily regimens that cannot reasonably be attained unless they are permitted to be off leash in outdoor environments that support positive interaction with other dogs and people. Dogs lacking in sufficient exercise and socialization skills are at greater risk of developing poor behavior and social skills that runs counter to the animal's and the public's interest.

Corr. ID: 1317

Organization: *Not Specified*

Comment ID: 195060 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a dog trainer in the Bay Area and believe that off leash dog play and exercise is a huge part of a behaviorally well dog. Without off leash areas to roam and interact with other dogs and people, dogs will most likely develop many behavior concerns due to lack of contact, frustration from leash restraint and this may escalate to aggression. As a dog owner and someone that interacts with hundreds of dog owners every week, we need off leash areas in order to live harmoniously in this city.

Corr. ID: 1351

Organization: *Not Specified*

Comment ID: 195199 **Organization Type:** Unaffiliated Individual

Representative Quote: As I am sure you are aware, it is very important for a dog's mental and physical health that they get plenty of exercise. Some dog breeds require more exercise than others and it would be difficult for those breeds, such as the Vizsla, to get the proper exercise they require if they can not run and play off leash. Exercise and socializing is critical to a dog's health and well-being.

Corr. ID: 1897

Organization: *Not Specified*

Comment ID: 200387 **Organization Type:** Unaffiliated Individual

Representative Quote: As an owner of a certified Service Dog, I am particularly upset at the prospect of having her off-leash running activity

curtailed or eliminated. For her to run unbridled is her only opportunity to be "off work," and is essential for her well-being. Obviously, this leads to my own well-being, as she takes care of me all day, every day. I must suggest you take into consideration the impact this management plan will have on the many of us who rely on the assistance of their service animals.

Response:

The preferred alternative would establish multiple ROLAs in the San Francisco and Marin County areas of GGNRA. The majority of ROLAs would be large enough to accommodate dogs 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 ROLAs.

ROLAs would not be completely enclosed by fences. Please see chapter 2 for a detailed description of the locations of ROLAs under the preferred alternative. Please see chapter 4 for analysis of potential redistributive effects to other dog parks from changes at GGNRA.

Concern ID:

**CONCERN
STATEMENT:**

29713

Commenters suggest that removing/restricting the off-leash areas as suggested in the DEIS will make it harder for the SPCA to perform their goal of "no kill" at animal shelters and/or more dogs will be given up at shelters or less dogs will be adopted.

Representative Quote(s): Corr. ID: 578

Organization: San Francisco Professional Dog Walkers Association

Comment ID: 182094 **Organization Type:** Unaffiliated Individual

Representative Quote: San Francisco has a "No Kill" goal that no potentially adoptable animal in a city shelter (SF Animal Care and Control, SF/SPCA, Pets Unlimited). Representatives of the SF/SPCA have said that the Preferred Alternative will make it harder for the SF/SPCA to perform their mission to reduce surrenders to city shelters and make San Francisco a truly No Kill city.

Corr. ID: 1337

Organization: *Not Specified*

Comment ID: 195122 **Organization Type:** Unaffiliated Individual

Representative Quote: Dogs that are not adequately exercised can develop behavior problems such as barking, destroying property in the home, etc. Behavior problems are one of the primary reasons that people surrender dogs at shelters.

Corr. ID: 1915

Organization: *Not Specified*

Comment ID: 192593 **Organization Type:** Unaffiliated Individual

Representative Quote: The trickle down effect of the GGRNAs plan would result in more dogs being dropped off at shelters, as dogs desperately need to learn social skills from each other and they need an outlet for their energy.

Corr. ID: 3208 **Organization:** Rocket Dog Rescue
Comment ID: 202513 **Organization Type:** Unaffiliated Individual
Representative Quote: As a passionate dog rescuer, I can tell you that the preferred alternatives in the Plan will make the Bay Area's homeless animal problem worse. Less people will be able to or likely to keep their companion animals if they are stripped of places in which they are able to properly exercise their animals. The Plan is akin to putting more burden on our shelters and sending more dogs to needlessly die.

Not to mention that, in years of walking Ocean Beach or Crissy Field every single day, sometimes with dogs and sometimes without dogs, I have yet to see any wildlife or sensitive plant habitats harmed or infringed upon by companion animal dogs. Dog owners that use this RECREATION area are inherently responsible and value all life.

Corr. ID: 3466 **Organization:** *Not Specified*
Comment ID: 203297 **Organization Type:** Unaffiliated Individual
Representative Quote: Please reconsider. These are two of the reasons there are so many dogs in the shelters. People need a place to take their dogs, especially living in the city, where many do not have access to a yard. Dogs need to run, or often they have behaviour issues, stemming from built up energy and boredom, and guardians need a place to take them.

This hurts everyone. The shelters will be even more overcrowded.

Those who adopt should be rewarded, not made to feel as though no one wants them to succeed.

This also affects the dog-walkers and they provide a much needed service to all of those who work long hours, and are unable to give their dogs the outings they need to be healthy.

Response: The preferred alternative would continue to offer multiple areas throughout the park for dog walking under voice and sight control within ROLAs.

Concern ID: 29715
CONCERN STATEMENT: [Some dogs do better socially on leash and these on-leash areas are better for those \(small, older, disabled\) dogs.](#)

Representative Quote(s): **Corr. ID:** 1551 **Organization:** *Not Specified*
Comment ID: 200012 **Organization Type:** Unaffiliated Individual
Representative Quote: I'm commenting to encourage the GGNRA to both designate some on-leash areas and to enforce leash laws in these areas. A lot of the accessible hiking areas are either legally off-leash, or the bulk of people who go there flagrantly violate leash laws. A lot of dogs have special needs. Besides leash-reactive dogs who need some extra help and training, there are older dogs, disabled or physically challenged dogs, and even small breeds that can benefit from on-leash areas where approaches by other dogs are more controlled. I support off-leash areas for dogs that are comfortable in these spaces. But please, ensure that there is some space for dogs that do

better when everyone is on leash, and make sure the laws are enforced so that everyone can have a good experience.

Response:

The preferred alternative would allow multiple on-leash dog walking areas throughout the park. In all areas except Fort Funston, dog walkers preferring an on-leash dog walking experience would be in areas separated from ROLAs. However, at Fort Funston, dog walkers preferring an on-leash dog walking experience would be required to pass through a small portion of the upland ROLA to access other on-leash trails north of the main parking lot.

BB1300 – BAKER BEACH: DESIRE OTHER ALTERNATIVE

Concern ID:

29263

CONCERN STATEMENT:

Commenters support alternative A, the 1979 Pet Policy, for the preferred alternative for Baker Beach. The existing off-leash dog walking areas should continue to be available to dogs and responsible owners. If current conditions are unlikely, alternative E would be the best compromise since the southern portion of the beach would contain a ROLA.

Representative Quote(s):

Corr. ID: 796

Organization: *Not Specified*

Comment ID: 186025 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a daily user of the Marin Headlands, Crissy Field, and Baker Beach. I would like to support alternative A in all these locations. Please keep the existing off leash areas open and available to dogs and their responsible owners

Corr. ID: 1243

Organization: *Not Specified*

Comment ID: 194924 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a frequent user of Baker Beach and would like to voice my support for Alternative A for Baker Beach (Map 12-A:Baker Beach). I believe Alternative A takes into account the needs and interests of the majority of recreational users of Baker Beach without having a negative impact on any of these users, or perhaps more importantly, the environment.

Corr. ID: 1554

Organization: *Not Specified*

Comment ID: 190742 **Organization Type:** Unaffiliated Individual

Representative Quote: My preference for Baker Beach is to leave it as is, however, I realize that is highly unlikely. One proposal seems to have approximately 1/2 the beach designated off leash. I feel that is an acceptable compromise.

Corr. ID: 1774

Organization: *Not Specified*

Comment ID: 191571 **Organization Type:** Unaffiliated Individual

Representative Quote: If you cannot reconsider "the 1979 pet policy" as the Preferred Alternate for Baker Beach, then "Alternative E" for Baker Beach should be chosen.

Response:

Alternative A and alternative E were not selected as the preferred alternative. Use of Baker Beach by dog walkers is typically low and there

are other ROLAs within GGNRA's San Francisco lands. Please see chapter 2, Preferred Alternative for Baker Beach for additional rationale.

BB1400 – BAKER BEACH: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29267
CONCERN STATEMENT: ROLAs - Allow ROLAs on the southern portion of Baker Beach and on trails (specifically Coastal Trail) and allow on-leash dog walking within the picnic areas and the northern portion of Baker Beach.

Representative Quote(s): **Corr. ID:** 417 **Organization:** *Not Specified*
Comment ID: 181588 **Organization Type:** Unaffiliated Individual
Representative Quote: Baker Beach (proposed Alternative D): The current proposal is for dogs leashed on most trails, banned from North Baker Beach. Instead, dogs should be allowed off-leash on the trails and old battery nearest the parking lots, as they aren't sensitive habitat and not too high traffic. On leash in the picnic area and all other trails, as well as North Baker Beach (ie: not banned, but leashed). South Baker Beach, near the stream's run-off, should be designated as off-leash. This provides concern for habitat (leashed) without banning dogs, and encourages dog owners to walk their dogs on the southern portion, which would limit dogs in other areas (again, if the alternative is there, most dog walkers would prefer that area), as well as concern for picnic areas.

Corr. ID: 1949 **Organization:** *Not Specified*
Comment ID: 192689 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternative 'A'+
The entire "Coastal Trail" needs to be a regulated off leash area..particularly since the trail is sparsely populated much of the day + night....

Response: ROLAs would not be established at Baker Beach. Trails at this site are currently designated for on-leash dog walking under alternative A. ROLAs on trails are discussed in the Alternative Elements Eliminated from Further Consideration section of chapter 2. Establishing ROLAs on trails would create safety concerns for other park users as they are often narrow and have a limited line of sight. The creation of ROLAs on trails would also result in a higher likelihood of impacts on resources adjacent to trails, as off-leash dogs can more easily access habitat adjacent to trails than dogs on leash. Additionally, the use of Baker Beach by dog walkers is typically low, and there is not a definite need for a ROLA. Please see chapter 2, Preferred Alternative for Baker Beach for additional rationale.

Concern ID: 29268
CONCERN STATEMENT: Time of Day Restrictions - Allow ROLAs during "quiet periods" during the day at Baker Beach, specifically in the early morning and evenings on weeknights.

Representative Quote(s): **Corr. ID:** 2024 **Organization:** *Not Specified*
Comment ID: 193239 **Organization Type:** Unaffiliated Individual
Representative Quote: Why not have TIMED sessions for dogs to be off leash at Baker Beach - say 7-10 A.M. only? Then maybe no dogs. That

would give dog owners a chance to exercise their dogs, and then the beach is free of dogs the entire rest of the day. China Beach, next door, allows no dogs at all, so birds can go there. Better screens could easily be installed to keep dogs out of the vegetation next to parking lots

Corr. ID: 2045 **Organization:** *Not Specified*
Comment ID: 193289 **Organization Type:** Unaffiliated Individual
Representative Quote: Baker Beach
Morning & evening weekday only off-leash would not conflict the visitor experience (busiest tourist time)

Corr. ID: 2131 **Organization:** *Not Specified*
Comment ID: 193423 **Organization Type:** Unaffiliated Individual
Representative Quote: Baker Beach is very quiet during periods of the day. Please put up good signage for off-leash times. Not weekends or holidays of course.

Response: The park's experience is that time of day restrictions can be difficult to enforce, and allowing use during early mornings and evenings could impact wildlife that use the area during those times; however, this management concept will still remain an option for dog management in the future. Please see chapter 2, National Park Service Preferred Alternative for additional information on time of use restrictions.

CB1000 – COMMENTS REGARDING THE COMPLIANCE BASED MANAGEMENT STRATEGY

Concern ID: 29651
CONCERN STATEMENT: Commenters oppose the compliance-based management strategy because it is unfair/unclear and/or omits critical information that is not clearly defined in the draft plan/EIS. Commenters find the strategy unfair because it only allows changes to be more restrictive, does not include an opportunity for public hearings or public comment if changes are made, and does not define what compliance is or how it will be determined.

Representative Quote(s): **Corr. ID:** 606 **Organization:** *Not Specified*
Comment ID: 182193 **Organization Type:** Unaffiliated Individual
Representative Quote: I have serious concerns about the GGNRA's off-leash proposal, particularly, the "poison pill" of the Compliance-based Management Strategy. A management plan should not come with a built-in nuclear option, which is what this is. This strategy is fundamentally unfair and unbalanced since it -

- Allows the off-leash status to be changed in only one direction (toward more restriction) with no possibility of increased access in the future.

- Circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made.

- Omits critical information about how compliance will be determined, allowing room for misunderstanding and misinterpretation.
- Permits the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions.
- Makes the change permanent.

While there should be, and are, enforced penalties for bad actors, the vast majority of people who do not act badly should not be penalized for the bad actions of a few. No number of responsible dog owners will stop what will become the inevitable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. This component **MUST** be removed from the proposal.

Corr. ID: 740 **Organization:** *Not Specified*
Comment ID: 182693 **Organization Type:** Unaffiliated Individual
Representative Quote: This is particularly concerning since the Compliance-based Management Strategy component of the proposal allows the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions. The fact that the GGNRA can unilaterally circumvent the legal requirement to have a public hearing for any future changes is seriously concerning - it is not the way we do things in America!

Corr. ID: 772 **Organization:** *Not Specified*
Comment ID: 185693 **Organization Type:** Unaffiliated Individual
Representative Quote: The compliance-based management strategy is by definition too vague. How will the total number of dogs be determined without some kind of license or permit that also designates how often the dog uses the area? Most of the time I am exercising, I never see park personnel. If I walk my dog daily for an hour along the promenade and some out-of-town visitor has their dog off-leash in the same area, will that count as 1 violation out of 8 "dog uses", will it be 50% of the dogs on the path at that time, or will there be some accommodation for the length of time I have been in compliance and the de minimus time the visitor is not compliant? And for those who object to dogs being in the space they feel should be dog free (but has been designated ROLA), will there be an easing of restrictions if there is less than 75% compliance with the dog-adverse being in a ROLA area?

Corr. ID: 1339 **Organization:** *Not Specified*
Comment ID: 195134 **Organization Type:** Unaffiliated Individual
Representative Quote: I find the adaptive management provision of the regulated off-leash areas (ROLAs) to be unacceptable. This provides the NPS with a mechanism to further erode dog access to on-leash only and even to prohibit dogs entirely without further consultation. The plan further states that under no circumstances will the reverse be true - once dogs are banned the park will never consider opening up access again.

Corr. ID: 1565 **Organization:** *Not Specified*
Comment ID: 190769 **Organization Type:** Unaffiliated Individual
Representative Quote: All areas: Compliance of 75% after 12 months this needs further definition. What is compliance? How do you measure it? Does it apply to tourists? Is that fair to Bay Area residents?

Corr. ID: 2274 **Organization:** *Not Specified*
Comment ID: 201063 **Organization Type:** Unaffiliated Individual
Representative Quote: Furthermore, as an environmentalist, I believe there should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status can be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined - by volunteers biased against dogs? by surveillance cameras? - is not included in the DEIS.

Corr. ID: 2911 **Organization:** *Not Specified*
Comment ID: 202577 **Organization Type:** Unaffiliated Individual
Representative Quote: The DEIS includes a "compliance-based management strategy" that says that, if there is not enough compliance with the restrictions imposed by the Preferred Alternative, the GGNRA will change the management of the various areas to the next more restrictive level - an offleash area will become on-leash only, an on-leash area will become no dogs at all. This change will be permanent, with no chance to go back to less restrictive levels at any time in the future. This section must be removed from any final Dog Management Plan.

a) This compliance-based management strategy is decidedly unfair, because it can only be changed in one direction - toward more restrictive levels of access for people with dogs.

b) There is no provision for public comment in the case of a change in status of an off-leash or on-leash area because of the compliance-based management strategy. The GGNRA has already lost two court cases (and one appeal) when it tried to make a significant and controversial policy change without going through a public process. The federal courts have routinely told the GGNRA that they have to hold public meetings and take public comments before making such changes. Clearly, a change in status of an off-leash area to leash-only would be both significant and very controversial, and therefore should require a period of public comment and public hearings before being implemented. The poison pill in the DEIS is an end run designed to allow the GGNRA to make such changes without having to go through a public process (they can claim the public process was the public comment on the DEIS itself, not on the changes it allows at a future time).

c) How will compliance be monitored? Who will do the monitoring? The GGNRA has repeatedly relied on poorly trained volunteers with a deep-seated bias against dogs to monitor the interactions between dogs and snowy plovers. Why would we expect these compliance monitors to be any less biased? Will their claims of non-compliance be valid? Will the

GGNRA resort to the use of surveillance cameras to monitor compliance? While noting that there is no mention of surveillance cameras in the DEIS, GGNRA staff have refused to say they would never be used.

Corr. ID: 4089 **Organization:** Crissy Field Dog Group
Comment ID: 208381 **Organization Type:** Unaffiliated Individual
Representative Quote: The Draft Plan/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. However, the detailed description of this critical element has not been conveyed and is not included in the document (as noted on page 64).

Corr. ID: 4443 **Organization:** San Francisco Dog Owners Group
Comment ID: 264251 **Organization Type:** Non-Governmental
Representative Quote: Without a full description of exactly how this monitoring and recording of non-compliance will be done, there is no way for anyone to know whether or not the CBMS will be a problem or not, whether it is worth opposing or not. This denies people the ability to comment intelligently on the CBMS, and, therefore it must be removed.

Changing an off-leash area to on-leash, or banning dogs completely from an on-leash area would clearly be both significant and highly controversial. But CBMS will deny the public the opportunity to comment on the change when it is made. It will happen automatically.

Traditionally adaptive management plans do not only go one way ' if there is a documented impact, additional restrictions take place, but where there is no impact observed as a result of the new restrictions, they can be eased. The CBMS as outlined in the DEIS is one-way only. The restrictions made will be permanent, with no chance to go back to the less restrictive leash requirements if no impacts are documented.

Response:

The monitoring-based management strategy (MMS) (formerly the compliance-based management strategy) has been revised based on comments received in the public comment period. Changes to the MMS have been made in chapters 2 and 4 of the draft plan/SEIS. Monitoring would inform park management and law enforcement when, where, and how to prioritize responses to noncompliance. When the level of compliance is deemed unacceptable based on violations and/or impacts to resources, primary management actions such as focused enforcement of regulations, education, and establishment of buffer zones, time and use restrictions, and special use permit (SUP) restrictions would be implemented. If noncompliance continues, secondary management actions including short-term closures, typically one year or less, would be implemented through the compendium. The park would evaluate whether to propose a long-term closure, which would be made available to the public. In addition, the MMS itself will be peer reviewed and subject to public comment prior to implementation.

Concern ID:
CONCERN
STATEMENT:

29652

Commenters have stated they are in support of the compliance-based management strategy as they have seen multiple dog walkers in non-compliance with current regulations. Citations should be issued to non-compliant dog walkers. Some commenters believed that the compliance-based management strategy should be higher than 75 % compliance since this would still allow disturbance within the park sites.

Representative Quote(s): **Corr. ID:** 585

Organization: *Not Specified*

Comment ID: 182110 **Organization Type:** Unaffiliated Individual

Representative Quote: I fully support the concept of a compliance-based management strategy, wherein lack of compliance means a permanent change to a more restrictive management classification. Again, if I thought this was enforceable, I would support it. The enforcement records indicate that most non-compliance with dog-owners resulted in a warning rather than a citation. Warnings don't produce the same results that citations do, so I would hope that any enforcement strategy would allow a window of adjustment wherein warnings are issued (maybe a year), but then go to an all-citation based policy

Corr. ID: 944

Organization: *Not Specified*

Comment ID: 191499 **Organization Type:** Unaffiliated Individual

Representative Quote: 4. The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

Corr. ID: 2675

Organization: NPCCS

Comment ID: 195493 **Organization Type:** Unaffiliated Individual

Representative Quote: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Corr. ID: 2701

Organization: *Not Specified*

Comment ID: 195550 **Organization Type:** Unaffiliated Individual

Representative Quote: In any event, I would strongly urge you to implement the compliance program you propose. The advocates for off-leash repeatedly make statements that suggest only a tiny minority of owners don't comply with relevant rules, but my experience at parks and other locations where dogs are prohibited or are required to be on-leash is that a large number of owners do not obey the rules. I think the advocates should encourage the responsible owners to self-police the less responsible, and this is a good way to do it.

Corr. ID: 4683 **Organization:** *Not Specified*
Comment ID: 210180 **Organization Type:** Unaffiliated Individual
Representative Quote: 75% compliance: The idea of 75% compliance is unrealistic and unacceptable. With current closures to off leash dogs on most of Ocean Beach, we only have less than 30% compliance with leash laws during the period of mid July 2010 and mid May 2011. Success cannot be measured at a level of poor compliance. We believe the Park Service should establish a success goal of 85% for the first year or the area should be closed to dogs all together. The rate for the following years should be at the 95% level for all beaches and other sensitive habitat areas. Compliance might be supplemented by education and warnings, but that has not worked in the past. It is a simple fact that compliance must be enforced with citations on a daily basis until the desired compliance rate is achieved.

Response: The monitoring-based management strategy (MMS) (formerly the compliance-based management strategy) has been revised based on comments received in the public comment period. Changes to the MMS have been made in chapters 2 and 4 of the draft plan/SEIS. One change includes the removal of the percentage trigger from the MMS. While simplicity and ease of measurement supported a uniform measurement and trigger (threshold), the numbers and types of visitor uses and range of resources varies widely at different sites. Given these differing contexts, uniform application of a 75% threshold and uniform weighting of violations could lead to divergent outcomes with less than uniform protection of NPS resources and values. For example, based on visitation data, a 75% 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. This addition of resource monitoring will also allow NPS to weigh violations within the context of an area.

Concern ID: 29655
CONCERN Commenters oppose or question Compliance-Based Management and how the park will monitor or demonstrate the level of compliance or how the park will measure non-compliance [without baseline conditions]. It is recommended that the park monitor to determine baseline conditions and then measure impacts to resources rather than monitor for compliance. A detailed monitoring plan with clear, enforceable standards and metrics should be written.
STATEMENT:

Representative Quote(s): **Corr. ID:** 1210 **Organization:** *Not Specified*
Comment ID: 194853 **Organization Type:** Unaffiliated Individual
Representative Quote: Compliance-Based Management Strategy: As described in the draft, it is unclear how GGNRA staff would be able to demonstrate with valid data that "compliance has fallen below 75 percent (measured as the percentage of total dogs/dog walkers observed during the previous 12 months not in compliance with the regulations. . .). This strategy has the potential to create a lot of law suits and acrimony between GGNRA staff and dog walkers.

Corr. ID: 4223 **Organization:** Crissy Field Dog Group
Comment ID: 208949 **Organization Type:** Unaffiliated Individual
Representative Quote: The proposed "compliance-based" approach should be modified to create a baseline of current conditions, 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.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 200885 **Organization Type:** Non-Governmental
Representative Quote: We also have issues with the "Compliance-Based Management Strategy" discussed on page 1116 of the report. Although we feel that this could work, if properly implemented, there is insufficient detail provided on how compliance is going to be monitored.

Corr. ID: 4443 **Organization:** San Francisco Dog Owners Group
Comment ID: 264250 **Organization Type:** Non-Governmental
Representative Quote: The Compliance-Based Management Strategy (CBMS) must be abandoned and removed from the DEIS.

There is no explanation of how the CBMS will encourage compliance with sections of the CFR applicable to dog management.

There is no attempt to determine whether or not the non-compliance actually causes any impacts on park resources, visitors, or staff.

There is no evidence that CBMS will have any beneficial impact on park resources, visitors, or staff, and especially no evidence that it will be any more beneficial to any of them than the No Action Alternative without a CBMS.

The description on page 63 indicates CBMS will provide the framework for monitoring and recording observed non-compliance. That implies the DEIS contains information on how the monitoring and recording will be done. But there is absolutely no information in the DEIS about how the monitoring will be done.

Corr. ID: 4533 **Organization:** *Not Specified*
Comment ID: 209689 **Organization Type:** Unaffiliated Individual
Representative Quote: There is no indication of how compliance would be measured and by what standards or who would measure it, and the consequences of non-compliance (for which there is not necessarily any or significant negative impact on natural resources) are rigid and biased. Change the Plan/DEIS to instead provide for management of areas driven by an adaptive management policy that assesses the impacts of non-compliance and provides regulation based on the impacts, with the ability to reinstate dog walking policies as previously enjoyed in areas where they

may be restricted because of negative impacts if those impacts can be remedied. The current ROLA regulations in the Plan should be thoroughly revised to add clarity and allow for such flexibility and fairness to responsible citizens with dogs.

Response:

The monitoring-based management strategy (MMS) (formerly the compliance-based management strategy) has been revised based on comments received in the public comment period. Changes to the MMS have been made in chapters 2 and 4 of the draft plan/SEIS. The updated 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, and will guide use of park resources to address those violations. It will also monitor for impacts to natural and cultural resources. All areas and zones addressed by the dog management plan will be subject to monitoring. A baseline will be established and monitoring efforts may be prioritized, with the park reducing the frequency of monitoring in low use or high compliance areas to focus on areas with high use or low compliance as needed. Monitoring will continue in all areas for at least 4 years. NPS will prepare annual reports documenting monitoring data. In addition, the MMS itself will be peer reviewed and subject to public comment prior to implementation.

Concern ID:
CONCERN
STATEMENT:

41818
Changing the status of off-leash areas to on-leash or no dogs via the compliance-based management strategy should go through public review. There is concern that once the draft plan/EIS goes final further decisions will be made without public input, especially since they will be significant and very controversial

Representative Quote(s): **Corr. ID:** 578

Organization: San Francisco Professional Dog Walkers Association

Comment ID: 182096 **Organization Type:** Unaffiliated Individual
Representative Quote: The Compliance-Based Management Strategy must go. This poison pill that will allow the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions will not work. The change would be permanent. A management plan should not come with a built-in nuclear option, which is what this is. It allows a relatively few bad players to undermine and destroy a traditional recreational use of the area. No number of responsible dog owners will stop what will become the inexorable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. Tens or hundreds of thousands of hours of incident-free dog walking will not matter. There should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status can be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined - by volunteers biased against dogs? by surveillance cameras? - is not included in the DEIS.

Corr. ID: 1803 **Organization:** *Not Specified*
Comment ID: 191644 **Organization Type:** Unaffiliated Individual
Representative Quote: b) There is no provision for public comment in the case of a change in status of an off-leash or on-leash area because of the compliance-based management strategy. The GGNRA has already lost two court cases (and one appeal) when it tried to make a significant and controversial policy change without going through a public process. The federal courts have routinely told the GGNRA that they have to hold public meetings and take public comments before making such changes. Clearly, a change in status of an off-leash area to leash-only would be both significant and very controversial; and therefore should require a period of public comment and public hearings before being implemented

Corr. ID: 2327 **Organization:** *Not Specified*
Comment ID: 201926 **Organization Type:** Unaffiliated Individual
Representative Quote: What concerns us is that after these hearings are over and agreements have been made about leash laws and areas, the proposed option gives the GGNRA the opportunity to change these agreements without a further hearing. How is this fair? If this is the case, what is the purpose of the comment period? This Compliance-Based Management Strategy makes the whole process seem like a mere formality to keep us dog people in line and to gain the control that will eventually mean more and more restrictions. How can we enter into this process in good faith with this kind of strategy in place?

We believe this strategy should be removed from any option that is finally adopted.

Response:

The monitoring-based management strategy (MMS) (formerly the compliance-based management strategy) has been revised based on comments received in the public comment period. Changes to the MMS have been made in chapters 2 and 4 of the draft plan/SEIS. Monitoring would inform park management and law enforcement when, where, and how to prioritize responses to noncompliance. When the level of compliance is deemed unacceptable based on violations and/or impacts to resources, primary management actions such as focused enforcement of regulations, education, and establishment of buffer zones, time and use restrictions, and special use permit (SUP) restrictions would be implemented. If noncompliance continues, secondary management actions including short-term closures, typically one year or less, would be implemented through the compendium. The park would evaluate whether to propose a long-term closure, which would be made available to the public. In addition, the MMS itself will be peer reviewed and subject to public comment prior to implementation.

CC2000 – CONSULTATION AND COORDINATION: REG-NEG PROCESS

Concern ID: 29834
CONCERN STATEMENT: Commenters question the Negotiated Rulemaking process, including concerns about the consensus reached (including the decision to create a fully enclosed ROLA), about the number of representatives and areas

considered from Marin County, that local citizens (including dog owners) should have been able to participate in regulation drafting, about the lack of accomplishments as a result of the process, and concerns that it did not take into account all important factors and circumstances.

Representative Quote(s): **Corr. ID:** 4005 **Organization:** *Not Specified*
Comment ID: 206271 **Organization Type:** Unaffiliated Individual
Representative Quote: One general point that I find particularly disturbing is the lack of participation allowed to Marin County in creating the Reg Neg committee itself. To exclude such an extensive natural area from even being at the table as a stakeholder to me seems patently absurd. Agreement or disagreement with concepts or proposals is one thing; exclusion from participation in the discussion about them is quite another.

Corr. ID: 4626 **Organization:** Marin Unleashed
Comment ID: 264267 **Organization Type:** Non-Governmental
Representative Quote: The Reg. Neg. Committee never discussed the 1979 on-leash areas in Marin, nor did it discuss most of the off-leash areas. Few of the areas that were included in the 1979 Pet Policy for Marin are found in the Draft Plan/DEIS preferred alternatives for Marin.

There were only three Marin areas that were discussed during the entire Reg. Neg. Committee process: Rodeo Beach, Muir Beach, and Oakwood Valley.

Corr. ID: 4639 **Organization:** *Not Specified*
Comment ID: 208788 **Organization Type:** Unaffiliated Individual
Representative Quote: I served on the committee that was supposedly charged with "negotiated rulemaking". I agreed that there might have to be compromises, as did the representatives of all the other dog friendly groups. Apparently, that requirement (compromises) was not a requirement for many of the other folks that served on this committee. I went to each and every area that the GGNRA manages. I walked/hiked. I photographed each area. I assumed we'd be talking about specific areas and how they were being used currently and how to manage them better. I thought we might be able to discuss access (Milagra Ridge, for example, is basically a neighborhood park because the parking is extremely limited & the access without an automobile is difficult). We suggested discussing timed use (successful in a number of areas). We were told that timed use was too difficult for people to understand! We suggested a tag system, similar to one being used by Boulder Open Space in Colorado (with people actually going to Boulder to investigate the use). That, too, was dismissed. So, in two years almost nothing was accomplished. I was disappointed in the facilitators and disgusted that a few people made sure that nothing was ever really discussed. And yet the Park Service managed to come up with a huge plan that is NOT a result of any negotiated rulemaking.

Corr. ID: 4697 **Organization:** *Not Specified*
Comment ID: 227446 **Organization Type:** Unaffiliated Individual
Representative Quote: Negotiated rulemaking protocols generally call for considering all potential solutions and allowing the public process to paint

on a fresh canvas. Although the NPS received objections to the negotiated rulemaking process proceeding based on constrained options, the NPS went forward with the drastically curtailed approach precluding full consideration of the relevant factors.

Reliance of such an approach in the face of notice of the clear insufficiency of the approach is arbitrary and capricious and does not satisfy the 36 CFR 1.5 rulemaking requirements. The same procedural impropriety is employed in the current management plan alternatives in the DEIS.

Response:

The Negotiated Rulemaking process is a separate process from NEPA, and regardless of whether consensus was reached on a proposed regulation under Negotiated Rulemaking, it would still be subject to rulemaking under the Administrative Procedure Act, as well as impact analysis under NEPA.

NPS reminds the public that they are very much a part of the NEPA and rulemaking processes through public meetings and public comment, and that there are two more formal opportunities for public meetings and comment (draft plan/SEIS) and public comment (proposed rule).

As part of the NEPA process and range of alternatives, fencing or barriers were considered but dismissed as an alternative element. NPS re-evaluated fences or barriers around ROLAs in the supplemental EIS; see chapter 2 in the draft plan/SEIS for discussion of fencing/barriers.

CF1300 – CRISSY FIELD: DESIRE OTHER ALTERNATIVE

Concern ID:

29463

CONCERN

STATEMENT:

Commenters support alternative A because there is no problem with the current use of the area and no reason to limit the on-leash or off-leash dog areas at Crissy Field; reducing off-leash areas would diminish the enjoyment of this site, cause overcrowding in other off-leash dog areas or would not allow disabled (or mobility impaired) persons or families easy access to ROLAs.

Representative Quote(s): **Corr. ID:** 518

Organization: *Not Specified*

Comment ID: 181928 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a dog owner and use Crissy Field to exercise her quite often. I think that carving up that area into on-leash and off-leash areas would wreck the space and create more confusion. To that end, I think that the alternative map, Map 10A, is preferable. There aren't many off-leash areas like Crissy Field, with its large area and easy accessibility.

Corr. ID: 758

Organization: Golden Gate National Parks Conservancy

Comment ID: 185478 **Organization Type:** Unaffiliated Individual

Representative Quote: My comments concern Chrissy Field, However, it would be an unnecessary restriction to inforce leash laws on the beach. Up until now, families and dogs have happily co-existed here and the quality of enjoyment would be considerably diminished if that priviledge would be restricted.

Corr. ID: 2015 **Organization:** *Not Specified*
Comment ID: 193226 **Organization Type:** Unaffiliated Individual
Representative Quote: I have a well trained 10-yr old lab + I walk her almost every day on Crissy Field. I pick up after her. She needs to run, so walking her on a leash wouldn't do it. I am a senior citizen + can't access (mobility issues) the proposed ROLA areas.

Corr. ID: 2830 **Organization:** *Not Specified*
Comment ID: 201147 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a frequent visitor to Chrissy field and I see no reason to change the existing dog walking rules. On most days 80% of the beach goers are walking/playing with their dogs and everyone has got along just fine with that for years. Why change something that is working so well?

Corr. ID: 4281 **Organization:** *Not Specified*
Comment ID: 264222 **Organization Type:** Unaffiliated Individual
Representative Quote: Of the five Alternatives listed we clearly prefer Alternative A as it maximizes the ability of dogs and their walkers' to exercise, socialize and enjoy many of the wonderful attributes of Crissy Field.

Response: Alternative A was not selected as the preferred alternative because it would not provide on-leash and no-dog areas for other user groups, minimize user group conflicts, or maximum protection of natural resources. Please see chapter 2, Preferred Alternative for Crissy Field for additional rationale.

Concern ID: 29464
CONCERN STATEMENT: [There is support for alternative E because it provides a balance of use, including one large ROLA for the entire Airfield at Crissy Field and/or it provides a beach ROLA. Alternative E would also be readily enforceable.](#)

Representative Quote(s): **Corr. ID:** 1210 **Organization:** *Not Specified*
Comment ID: 194849 **Organization Type:** Unaffiliated Individual
Representative Quote: Crissy Field, Airfield: Instead of Alternative C, which is too complicated and very difficult to enforce, you should select Alternative E, which allows dogs off leash on the whole airfield, except as dictated by special events. Trying to enforce C, would be extremely difficult and very management intensive.

Corr. ID: 2342 **Organization:** *Not Specified*
Comment ID: 195386 **Organization Type:** Unaffiliated Individual
Representative Quote: In regards to the Crissy Field site I respectfully submit that Alternative E is the best compromise solution for this site. The open grassy area of air field should remain available to dogs under voice control. I do not see where restricting this area is justified.

Corr. ID: 2799 **Organization:** *Not Specified*
Comment ID: 201145 **Organization Type:** Unaffiliated Individual
Representative Quote: As a resident and dog owner in the City of San Francisco, I have enjoyed hundreds of Saturday mornings walking my dog

at Crissy Field. Crissy Field is one of the few clean, safe and open areas where dogs can run and play off leash in the City. Being able to run and play off leash is essential to a dogs well being.

Over the years I have observed that most dog owners are responsible, maintain control of their dogs and clean up after them. Thus I believe the current arrangement works fairly well, and I prefer alternative A of the Draft Environmental Impact Statement. However I understand the desire for a better defined policy and greater restrictions and thus alternative E is my second choice. Given how muddy the Crissy Field air field is in the winter and how many burs and foxtails it has in the spring, a beach off leash option is important for dogs and central beach makes the most sense since east beach and the promenade are used by most other park visitors.

Corr. ID: 4061 **Organization:** *Not Specified*
Comment ID: 207610 **Organization Type:** Unaffiliated Individual
Representative Quote: I am supportive of Chrissy Field map option E this provides the best balance of dog and non-dog access and usage.

Response: Alternative E was not selected as the preferred alternative for Crissy Field. The preferred alternative was selected because it provides the best option for multiple visitor use while protecting natural resources. Please see chapter 2, Preferred Alternative for Crissy Field for additional rationale.

Concern ID: 29465
CONCERN STATEMENT: Commenters support alternative D because it will provide protection for wildlife and habitat as well as listed species, including the western snowy plover.

Representative Quote(s): **Corr. ID:** 2553 **Organization:** *Not Specified*
Comment ID: 200792 **Organization Type:** Unaffiliated Individual
Representative Quote: As the mother of a small child, my family often uses the West beach area near the Warming Hut. During the times of year when it is not snowy plover season, and thus leashes required, we often have dogs running around the beach without their owners closeby. The dogs frequently come right up to the small children and sometimes scare them, and their parents. I have even seen dogs fighting with one another around small children. Thankfully I have never seen anyone hurt, but it is very disconcerting and frightening for children. There is also the problem of dog poop on the family beach. Due to these reasons, I would support the separation of dogs and the requirement for leashes in most areas. There should be dog-free areas for those people, and of course for the endangered species, who do not enjoy being around dogs that are not on leash. San Francisco has plenty of dog-friendly parks

Corr. ID: 3858 **Organization:** *Not Specified*
Comment ID: 208907 **Organization Type:** Unaffiliated Individual
Representative Quote: Chrissy Field I support Map 10-D. The main reason for this is that this area is important to the western Snowy Plover, which is listed as a threatened species under the federal Endangered Species Act.

Corr. ID: 4071 **Organization:** *Not Specified*
Comment ID: 207753 **Organization Type:** Unaffiliated Individual
Representative Quote: At Crissy Field and Ocean Beach I support Alternative D. Absolutely no ROLA should be allowed anywhere near threatened or endangered species habitat, including Ft. Funston.

Response: The preferred alternative for Crissy Field would provide protection for wildlife and habitat including the western snowy plover. Please see chapter 2, Preferred Alternative for Crissy Field for additional rationale.

Concern ID: 29466
CONCERN STATEMENT: Commenters support alternative B for Crissy Field for reasons including that the entire Airfield is open to off-leash dogs and the Wildlife Protection Area (WPA) will not allow dogs.

Representative Quote(s): **Corr. ID:** 1488 **Organization:** *Not Specified*
Comment ID: 191285 **Organization Type:** Unaffiliated Individual
Representative Quote: At Crissy Field, I prefer Alternative B for the East and Central beaches because those beaches are currently receiving tremendous off-leash dog pressure, and because on-leash restrictions are more consistent with the preferred alternative along the promenade there. The decision to make the Crissy Field Wildlife Protection Area off limits to dogs is correct, and will be easier to enforce if dog use adjacent to this area is on-leash only.

Response: Alternative B was not selected as the preferred alternative for Crissy Field. The preferred alternative was selected because it provides the best option for multiple visitor use while protecting natural resources. Please see chapter 2, Preferred Alternative for Crissy Field for additional rationale.

CF1400 – CRISSY FIELD: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29470
CONCERN STATEMENT: Commenters made various suggestions about creating a no-dog experience at Crissy Field, including specific areas where dogs should not be allowed such as east of the lagoon, areas of the airfield, or on some paths. Commenters also feel that the Wildlife Protection Area should be closed to both dog walkers and other visitors. It has been suggested to close the WPA to humans, close the WPA to both humans and dogs, create buffers near the WPA, or place a fence in the vicinity of the WPA to protect and reduce disturbance to the western snowy plover. Other commenters felt that commercial dogs should not be allowed at the site, and that if commercial dog walking is allowed there should be few licenses allowed and more restrictions than those for individual dog walkers.

Representative Quote(s): **Corr. ID:** 1067 **Organization:** GGRO
Comment ID: 192189 **Organization Type:** Unaffiliated Individual
Representative Quote: I would like to see Crissy field continue the way it has been with a loose leash law except in the areas where the snowy plovers spend the winter. This area should be protected more and be closed to both dogs and people.

I often go to Crissy field with my little dog and my binoculars. She needs the exercise and loves being off leash. I fret about her loss of freedom which she will feel as any person would.

Corr. ID: 1850

Organization: *Not Specified*

Comment ID: 192059 **Organization Type:** Unaffiliated Individual

Representative Quote: iii The DEIS bans dogs entirely from the WPA at Crissy Field. Comment: The DEIS fails to provide scientific support for the claim that dogs are the only factor disturbing Snowy Plover and other shorebirds in these areas. The DEIS should examine the effects of human disturbance as well. The DEIS should also ban humans from the portion of the WPA that lies between Central Beach (where dogs are permitted) and the Coast Guard Station. Human activity (children play, kite boarders practicing, etc) is regularly observed in this section of the WPA. If we really want to give the Snowy Plovers a chance, we should give them a place without human disturbance as well.

Corr. ID: 2680

Organization: *Not Specified*

Comment ID: 220111 **Organization Type:** Unaffiliated Individual

Representative Quote: I support the park's preferred alternative for Crissy Field with the following comments:

2. commercial dog walking activity should not be allowed. While I appreciate that these folks are small businesses trying to make a living, the dogs beat up the environment, spook wildlife, and don't contribute to the visitor experience. At the very least, they should be licensed like any other business in the park and there should be a limited number of licenses.

Corr. ID: 3080

Organization: *Not Specified*

Comment ID: 201299 **Organization Type:** Unaffiliated Individual

Representative Quote: While I think the preferred alternatives presented in the dog management plan will help decrease the number of disruptive encounters that children have with dogs, I believe there is still room for improvement in this area. Specifically, it appears that there are several park areas where there aren't any trails that will be "dog-free." An example of this is Crissy Field; the preferred alternative calls for a beach area that doesn't allow for dogs but it seems that all the pathways leading to that beach do allow for dogs. I would support some access points that would allow families to reach the beach without having to deal with dogs. I believe that there should be some trails and/or paths that do not allow dogs (on-leash or off) in each area of the park. The park is a shared resource and adults who do not wish to encounter dogs and/or do not want their children to encounter dogs during their park visits should have that opportunity.

Corr. ID: 3608

Organization: Golden Gate Audubon

Comment ID: 220104 **Organization Type:** Unaffiliated Individual

Representative Quote: The eastern portion of the airfield should be a no-dog area. The Crissy airfield attracts a wide variety of bird species, including rare vagrants, and is a popular venue for wildlife viewing. I often visit this site to view the migrating hawks in the fall, the Western

Meadowlarks each fall through spring, and I had the opportunity to see a rare species - the Red-throated Pipit, at this site.

Corr. ID: 4244

Organization: *Not Specified*

Comment ID: 209217 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a frequent user of the GGNRA, especially Crissy Field. My concerns are for the natural restoration. It is amazing. My worry is that dogs loving, lovable, and popular + polulous as they are will undermine this huge and successful endeavor. I see few birds there now which tells me they know dogs are everywhere - some leashed + some not. This seems an incomplete restoration because of dogs here.

I love dogs and dogs need parks and ocean areas to swim in. They need a big designated dog park of their own - in SF. To be allowed here and there means they go everywhere - due to signage problems and owners lacking respect or whatever.

My point- Crissy Field area should not have dogs at all.

Corr. ID: 4281

Organization: *Not Specified*

Comment ID: 264235 **Organization Type:** Unaffiliated Individual

Representative Quote: PROPOSED ALTERNATIVE F (as in Fair) for Crissy Field:

No-Dog Experience: The Wildlife Protection Area aka West Beach west of the old Coast Guard pier.

Corr. ID: 4296

Organization: *Not Specified*

Comment ID: 209015 **Organization Type:** Unaffiliated Individual

Representative Quote: I am an older woman who lives near Crissy Field and that is the only park I can get to easily. So, my comments are going to be limited to that portion of the report.

Secondly, I am against the allowance of dogs on leash on the path that runs from the near parking lot to the fishing pier. Very large numbers of people use this path. The dogs, even on leash, jump, bark and poop. There are accidents with bikers. Furthermore, if dogs are allowed off leash on the grassy airfield, who will patrol their getting onto the path on-leash? The dogs will continue to run, as they do now, between the field and the path, back and forth. In all the years I've been walking on that path, I've never seen any enforcement, not once.

I am distressed that the one park nearest to the largest concentration of people will be given over to the dogs. Let the dogs run free in a more remote area.

Corr. ID: 4584

Organization: *Not Specified*

Comment ID: 220095 **Organization Type:** Unaffiliated Individual

Representative Quote: Crissy East of the Lagoon ' The Freshwater Swale should be designated on the area maps as a no dog zone.

Response: The preferred alternative for Crissy Field allows visitors two beach areas for a no-dog experience. East Beach and the Wildlife Protection Area (WPA) 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 ROLA on Central Beach. Commercial dog walking would be permitted at Crissy Field; however, there would be a limit of 6 dogs per dog walker. The hours for commercial dog walking would also be limited to 8 a.m. to 5 p.m. Monday through Friday, and from 8a.m. to 11 a.m. on weekends. Please see chapter 2, Preferred Alternative for Crissy Field for more information.

Concern ID: 29476
CONCERN STATEMENT: Commenters made several suggestions about ROLAs at Crissy Field. Some commenters suggested adding more off-leash areas or ROLAs at Crissy Field because they feel that the area is already largely degraded, while other commenters supported removing or moving ROLAs to protect natural resources and for a no-dog experience. Commenters suggested that ROLA areas should be fenced at certain areas of Crissy Field, including the Central Beach, East Beach, and Airfield to protect adjacent areas. Some commenters noted that accessibility to the beach ROLA is an issue, including parking areas for disabled (or mobility impaired) persons or for families since leashes are required at parking areas (at East Beach) or the walk to the beach ROLA from the parking area would be longer than the current walk to the beach that allows dogs. Improvement for disabled visitors and families is needed.

Representative Quote(s): **Corr. ID:** 5 **Organization:** *Not Specified*
Comment ID: 181404 **Organization Type:** Unaffiliated Individual
Representative Quote: Regarding proposal for Crissy Field: So for this area (again the tidal area) I would respectfully request this be changed from leash only to "voice control" or be off limits only to large dogs who are safer playing in the surf, maybe allowing access only to dogs <20lbs who are less likely to have an impact on children and families in the area. Otherwise the proposal at Crissy Field makes sense.

Corr. ID: 863 **Organization:** *Not Specified*
Comment ID: 190031 **Organization Type:** Unaffiliated Individual
Representative Quote: I can understand that non dog owners would like to enjoy areas of the parks dog free, and I think that there is room for some compromise. However, I am strongly against taking away large off leash areas. I take my dog to Chrissie Fields weekly and the following is an example of what I feel would be a good compromise:
If you are walking north/ west, off leash would be permitted after the small bridge; all along the beach, all the way down to the warming hut and also the large grass area on the left down to the warming hut. The first part of the beach (by the parking lot) would give people a dog free environment as well as the picnicking area by the warming hut, but dogs would still have ample space to run and play.

Corr. ID: 1622 **Organization:** *Not Specified*
Comment ID: 190918 **Organization Type:** Unaffiliated Individual
Representative Quote: Let the dogs be off leash from the St. Francis Yacht Club to the Bridge.

Corr. ID: 1850 **Organization:** *Not Specified*
Comment ID: 220098 **Organization Type:** Unaffiliated Individual
Representative Quote: Crissy Field - - The Plan calls for making half the field available for off leash and half for on leash only but contemplates no barrier between the two areas. It will be very difficult for dog walkers to even see where the separation point occurs much less observe it.

Corr. ID: 2905 **Organization:** *Not Specified*
Comment ID: 202641 **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.

The airfield ROLA should have some type of physical barrier along the boundaries. A physical barrier will clearly define the ROLA area. Clearly defined boundaries will maximize compliance and minimize conflict. Consider a movable barrier that can be set up and taken down as needed. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Corr. ID: 2965 **Organization:** Urban Estuary Network
Comment ID: 220128 **Organization Type:** Unaffiliated Individual
Representative Quote: The Wildlife Protection Area at Crissy Field needs to be stoutly fenced off all the way around it and down to the low tide line. LARGE signs with a plover logo need to be plastered along the fence right down to the littoral zone. People walking along the beach often just do not see the signs down there.

Creating a ROLA in the center of the Airfield might bring more dogs down to the WPA. The ROLA needs to have fencing to mark its perimeter.

Corr. ID: 3937 **Organization:** *Not Specified*
Comment ID: 205875 **Organization Type:** Unaffiliated Individual
Representative Quote: Generally, when I visit the SPWPA there are numerous off-leash dogs, even though the SPWPA is signed for on-leash use only during the times of year when I am there. (The reports of the

Snowy Plover census also show significant non-compliance with the on-leash requirement.) As a result I generally don't see any Snowy Plovers. One evening, I visited at a time when there were no dogs present, and the Snowy Plovers were readily visible. I am afraid that if there is not a significant barrier between the ROLA and the SPWPA, numerous off-leash dogs will enter the SPWPA. Accordingly, if the ROLA and the no dog areas are immediately adjacent to each other, it will be necessary to erect a barrier between the two that dogs will be unable to cross. Before erecting such a barrier the NPS will need to consider whether such a barrier will have any adverse effect on the Snowy Plovers (e.g., by providing perches for bird predators).

Corr. ID: 4071 **Organization:** *Not Specified*
Comment ID: 207751 **Organization Type:** Unaffiliated Individual
Representative Quote: Western snowy plovers, Bank swallows, San Francisco garter snakes, Red legged frogs, Mission blue butterflies and Hickman's cinquefoil all the other endangered or threatened species need the best protection possible. Wherever protected species exist, as at Crissy Field and Ocean Beach, NO on or off-leash dogs should be allowed anywhere near sensitive habitat.

Corr. ID: 4221 **Organization:** *Not Specified*
Comment ID: 220125 **Organization Type:** Unaffiliated Individual
Representative Quote: Crissy Field - A fenced dog run should be established south of the parking lots for off-leash dog activity with a dirt surface (not sand, asphalt or concrete) where dogs can run, socialize and defecate, with a gathering area for the dog owners to congregate including benches. There should be a substantial dog-run at the east end parking lot (perhaps 50' by 150'), and a much smaller one at the west end of the Crissy area in close proximity to a parking lot.

Corr. ID: 4281 **Organization:** *Not Specified*
Comment ID: 264234 **Organization Type:** Unaffiliated Individual
Representative Quote: PROPOSED ALTERNATIVE F (as in Fair) for Crissy Field:
Off-Leash/Voice Control: The Air Field (use could be restricted for special events), and the East and Central Beaches.

Response:

Additional ROLAs, beyond Central Beach and the eastern portion of the Airfield, would not be established at Crissy Field. Fencing would be installed and maintained along the dunes at Crissy Field and at the eastern and western edges of the ROLA on Central Beach. No fencing would be placed around the perimeter of the ROLA on the Airfield because this would create impacts to the cultural landscape of the area. The draft plan/SEIS addresses ADA compliance in more detail. GGNRA continues to look into improvements that would provide additional visitor experiences for visitors with disabilities. If funding is available, an accessible beach mat, similar to those used elsewhere in GGNRA, would be installed to provide access to the ROLA on the Central Beach. Please see chapter 2, Preferred Alternative for Crissy Field for additional rationale.

Concern ID:
CONCERN
STATEMENT:

29562

On-Leash - Dogs should be leashed on the promenade from the parking lot to Crissy Field to try to remove the dangers of having off-leash dogs in the same area as runners, bikers, and other user groups. Other suggestions for on-leash areas included the following: on East Beach east of the stream to allow both a dog and no-dog experience within this area, on-leash within Central Beach to prevent dogs from accessing the tidal marsh areas, foot paths that cross the airfield, and multi-use trails.

Representative Quote(s): **Corr. ID:** 417

Organization: *Not Specified*

Comment ID: 181587 **Organization Type:** Unaffiliated Individual
Representative Quote: Crissy Field (proposed Plan C): Under the current proposal, dogs would be banned from East Beach and the Wildlife Protection Area, but Central Beach would remain off-leash. Crissy Field is perhaps the most popular beach in San Francisco for dog owners, and where the dog owner community (as part of the greater community) is most prevalent. Therefore, Central Beach should, in fact, remain off-leash. East Beach shouldn't ban dogs, but instead require they be on-leash east of the stream, off-leash starting west of the stream (the course changes, so this would be a changing boundary). This would allow families with both children and dogs to have the East Beach for picnics, etc... enabling them to have an undisturbed experience while still having their dog with them (on-leash), as it can be a hindrance for families with both children and dogs to find a place safe and accepting of both. However, those who are there with just dogs would, by default, naturally forgo East Beach in favor of Central Beach (few would want their dog on-leash when an off-leash alternative is just steps away, so even allow leashed dogs on East Beach would provide a relatively dog-less experience for those who choose).

Corr. ID: 4281

Organization: *Not Specified*

Comment ID: 264233 **Organization Type:** Unaffiliated Individual
Representative Quote: PROPOSED ALTERNATIVE F (as in Fair) for Crissy Field:

On-leash: The Promenade; and all roadways, walkways, paths, parking lots, the West Bluff Picnic area, the multi-use trail along Mason Street, and the Wildlife Protection Area east of the old Coast Guard pier.

Corr. ID: 4410

Organization: *Not Specified*

Comment ID: 206949 **Organization Type:** Unaffiliated Individual
Representative Quote: Crissy Airfield ' The foot paths that cross the airfield are multi-use trails and should be designated as on-leash areas. Allowing off-leash dogs on the airfield trails will lead to user conflicts.

Corr. ID: 4589

Organization: *Not Specified*

Comment ID: 210036 **Organization Type:** Unaffiliated Individual
Representative Quote: There are, however, some improvements that a modification could address for the positive, specifically as they relate to Crissy Field:

1. The crushed gravel promenade from the parking lots west past the grassy meadow is of particular concern. There are dogs on and off leash, bicycles,

runners, pedestrians, children learning to ride bikes, etc. Surely you have seen on weekends it is a mob scene and recipe for accidents. Leashing dogs in this area and eliminating bicycles would certainly cut down on the risk of injuries to all users of the promenade.

Response: On-leash dog walking would be allowed on the Promenade, and also allowed on the section of the Airfield west of the eastern-most north/south path, the trails and grassy areas near East Beach, and in parking lots and picnic areas. Dog walking would not be allowed on East Beach or in the Wildlife Protection Area. Please see chapter 2, Preferred Alternative for Crissy Field for rationale for on-leash dog walking areas.

Concern ID: 30903
CONCERN STATEMENT: Signage - Instead of eliminating dog walking from certain areas within Crissy Field, the park should design and install better signage stating regulations and informing visitors of the Wildlife Protection Areas.

Representative Quote(s): **Corr. ID:** 4581 **Organization:** *Not Specified*
Comment ID: 220099 **Organization Type:** Unaffiliated Individual
Representative Quote: Instead of taking away off leash areas, I think the GGNRA should consider adding new areas, and providing better signage and environmental barriers like the ones at Crissy Field. The draft Dog Management Plan and the Draft Environmental Impact Statement does not evaluate the value of these recreational activities and does not adequately consider alternatives such as environmental barriers and providing better signage and education to the public.

Response: Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage. The options of adding additional off-leash dog walking areas and adding fencing or barriers are discussed under the Alternatives Eliminated from Further Consideration section of chapter 2. Please see this section of chapter 2 for further rationale for the dismissal of these two alternative elements. In response to public comments about the need to evaluate the value of dog walking as a recreational activity, the draft plan/SEIS includes a more thorough analysis of the value of dog walking in both the Visitor Use and Experience and Health and Safety sections of chapters 3 and 4. These sections analyze the social and health benefits of dog walking, and the importance of dog walking for the recreational experience of some visitors.

Concern ID: 41408
CONCERN STATEMENT: Commenters suggested that there should be limits placed on the number and frequency of the events if they are to cause limits on access with dogs.

Representative Quote(s): **Corr. ID:** 4533 **Organization:** *Not Specified*
Comment ID: 209695 **Organization Type:** Unaffiliated Individual
Representative Quote: I also strongly disagree with other limitations that would be placed on dog access at Crissy Field and Rodeo Beach in particular. The additional limits on access in the grassy area, East Beach, West Beach and the paths to the Central Beach at Crissy Field, as well as in the Marin Headlands, especially along Wolf Ridge, are untenable and don't

appear to be based on or supported by sound science or any long-term monitoring of the sites. How is it that walking a dog on leash along Wolf Ridge has a more negative impact than people walking along the trail, assuming regulations (such as picking up after a pet and not harassing wildlife) are followed? The Plan/DEIS needs to be revised to include real science-based information taken from long-term monitoring of the sites that is conclusive regarding negative impacts before restrictions on recreation with dogs are suggested or imposed. In addition, the limitations placed on the grassy area of Crissy Field in connection with events needs should not be open ended. As written, the GGNRA could potentially always have events planned in the area and the grassy field can, effectively, always be off limits to people with dogs. There should be limits placed on the number and frequency of the events if they are to cause limits on access with dogs.

Response: To reduce limitations to dog walking access on the Airfield due to special events, the NPS has relocated the ROLA to the east end of the airfield where fewer events occur. Please see chapter 2, Preferred Alternative for Crissy Field for more detail.

Concern ID: 41736
CONCERN STATEMENT: Commenters are concerned that this draft plan/EIS is inconsistent with the FONSI for the Crissy Field development that concluded that there was no significant impact in maintaining the 1979 Pet Policy off-leash areas and was based on a condition that any limitation in off-leash access would only be made after a public hearing before the Advisory Committee. The draft plan/EIS is also not consistent/has a discrepancy with the GGNRA GMP.

Representative Quote(s): **Corr. ID:** 4088 **Organization:** *Not Specified*
Comment ID: 208352 **Organization Type:** Unaffiliated Individual
Representative Quote: And one other point that needs to be conveyed is the fact that according to the GGNRA's PEPC website regarding the GGNRA's new General Management Plan (GMP) Newsletter #5, dated Summer 2009, states that "the new plan will not revise decisions made in recent management plans for the Presidio, Crissy Field, Fort Point or Fort Baker". Simple logic should prevail that the Crissy Field Environmental Assessment will stand as is and 70 acres of off leash dog walking under voice control remains in place as was approved by the GGNRA/NPS. Clearly there is a discrepancy between the GGNRA's draft Dog Management Plan/DEIS and the new GGNRA GMP.

Corr. ID: 4659 **Organization:** *Not Specified*
Comment ID: 209076 **Organization Type:** Unaffiliated Individual
Representative Quote: While I appreciate the incentive and noble effort to attract wildlife to some areas, and enjoy seeing the progress in the lagoon area of Crissy Field, I believe pushing such goals over beach access results in a substantial improper deviation from the recreational mandate. For that reason I oppose the portions of the Preferred Alternative that further limit off leash access at Crissy Field. I note that the FONSI for the Crissy Field development concluded that there was no significant impact in maintaining the 1979 Pet Policy off leash areas and was based on a condition that any limitation in off leash access would only be made after a public hearing

before the Advisory Committee. That FONSI conclusion appears inconsistent with the DEIS.

Response:

As stated in chapter 2, the preferred alternative in the draft plan/SEIS is consistent with the GGNRA General Management Plan Amendment (GMPA) and amends the Crissy Field EA. Although the Crissy Field EA provided up to 70 acres of off-leash use, it was a broad planning document for the Crissy Field redevelopment and restoration efforts, and thus was completed before visitation levels, clear user patterns and preferences had been established, and before GGNRA began a comprehensive review of dog management for the majority of its managed lands. Now that GGNRA has managed the restored Crissy Field for a decade, noted its visitation patterns, user complaints, natural resources, and enforcement issues, it is clear that dog walking is a use that must be balanced with other competing uses within this extremely popular area.

CO1100 – COMMENTS CONSIDERED AN INDIVIDUAL CONCERN STATEMENT

Concern ID:
CONCERN
STATEMENT:

42133

Commenters question why noncompliance was assumed for alternative A (No Action) but was not assumed for the action alternatives.

Representative Quote(s):

Corr. ID: 4409

Organization: Montara Dog Group

Comment ID: 200897 **Organization Type:** Non-Governmental

Representative Quote: On page 109 (Table 5, Stinson Beach, Soils and Geology) under Alternative A, the second bullet identifies long-term, minor, adverse impacts in areas outside parking lots and picnic areas. These impacts are not repeated under the other alternatives despite the fact that, except for Alternative D, the management strategies under all of the alternatives are identical for Stinson Beach. Each of the statements in the first bullet, except for Alternative A, No Action, includes the clause "assuming compliance." At least for the soils and geology evaluation, the analysis seems to take it for granted that the No Action Alternative is inferior. Both of these are examples of biasing the analysis against No Action.

The No Action alternative is a continuation of the current GGNRA management plan and policies ' not a continuation of existing conditions.

Corr. ID: 4695

Organization: Golden Gate Audubon Society

Comment ID: 304866 **Organization Type:** Conservation/Preservation

Representative Quote: The DEIS should estimate impacts under the Preferred Alternative under a scenario where dog owners continue to fail to comply with regulations.

Response:

The no action alternative will continue to include the current dog management at the park. Impacts to park resources from the no action alternative will be based on the current conditions at the park. Noncompliance with existing regulations is demonstrated in the law enforcement data presented in chapter 3.

Concern ID: 42134
CONCERN STATEMENT: Commenters state that the Visitor Use and Experience sections in chapters 3 and 4 are inadequate and need to be updated including cumulative impacts.

Representative Quote(s): **Corr. ID:** 1803 **Organization:** *Not Specified*
Comment ID: 191662 **Organization Type:** Unaffiliated Individual
Representative Quote: Indeed the restrictions on off-leash access supported by the Preferred Alternative will have a serious negative impact on the thousands of ethnic minorities who walk their dogs off-leash in the GGNRA, a point not addressed in the DEIS. Off-leash dog walking is the most diverse recreation activity in the GGNRA, enjoyed by the widest variety of people ' seniors, kids, the disabled, every ethnic group, every sexual orientation, and every social and economic class.

Corr. ID: 4668 **Organization:** *Not Specified*
Comment ID: 305534 **Organization Type:** Unaffiliated Individual
Representative Quote: Visitor Experience Use and Experience
This section is extremely weak. Lumping all visitor who are against off-leash dogs in GGNRA as "visitors who would prefer not to have dog walking in GGNRA" does not begin to characterize the nature and variety of ways visitor experience can be impaired by dogs and off-leash dog walking in GGRNA and trivializes the intensity to which the presence off-leash dogs may cause feelings of fear and unpleasantness to visitors.

Various subgroups of visitors have extraordinary safety concerns because of off-leash dogs, including: 1) the elderly; 2) visitors with young children; 3) horseback riders and other special users; 4) blind and disabled visitors; 5) various minority groups; and 6) visitors who suffer from fear of dogs because of previous experiences or for other reasons. For many in these groups, an off-leash dog area may represent a flat out "no go" area. For visitors who do not necessarily have extraordinary safety concerns, the impact on their experience in visiting GGNRA due to dogs, especially off-leash dogs, can also be strong enough to displace them from off-leash areas. Many visitors enjoy the opportunities GGNRA offers to escape the urban environment and experience nature, solitude and even almost wilderness. Off-leash dogs can completely destroy the quality of this experience for many visitors.

Corr. ID: 4668 **Organization:** *Not Specified*
Comment ID: 305532 **Organization Type:** Unaffiliated Individual
Representative Quote: Visitor Experience / User Groups
The designation of three user groups, essential pro-dog, anti-ddg, and neutral, is an arbitrary and extremely oversimplified approach to evaluating visitor experience.

Corr. ID: 4693 **Organization:** *Not Specified*
Comment ID: 210098 **Organization Type:** Unaffiliated Individual
Representative Quote: Flawed Visitor Use Section In Chapter 4, pages 1401-1562:

This section fails to disclose the visitor use and experience from the perspective of the dog owner/walker. The analysis is skewed to only consider the experience of the park users who do not favor dogs in the park.

Response:

Chapters 3 and 4 for Visitor Use and Experience have been enhanced to incorporate commenters' thoughts and experiences related to dog walking at each of the sites. The designation of the three user groups, visitors who prefer to walk dogs in GGNRA, visitors who would prefer not to have dog walking in the GGNRA, and visitors who do not have a preference about dog walking in GGNRA, are still used; however, the user groups are further broken down to include users such as visitors with disabilities, visitors with guide dogs, minorities, and children.

Concern ID:

42135

**CONCERN
STATEMENT:**

Health and Safety section is inadequate and does not include a discussion of concerns of park visitors from off-leash dogs - the elderly, visitors with young children, horseback riders and other special users, blind and disabled visitors, various minority groups, and visitors who fear dogs.

For additional representative quotes, please see Concern 29737 (HS4000), Comments 264239 and 210091

Representative Quote(s):

Corr. ID: 4278

Organization: *Not Specified*

Comment ID: 305539 **Organization Type:** Unaffiliated Individual

Representative Quote: an article from Consumers Reports on February 3, 2011, which stated that "hospitalizations due to dog bites have risen dramatically in the last 15 years: up 86 percent since 1993.

"The dog-bite victims most likely to be hospitalized were young children and seniors.

"The number one reason for hospitalization is infection, other injuries and complications range from open wounds on the extremities and wounds on the had, neck and body to fractures and blood poisoning.

"These dog bites are taking a real bite out of our collective wallets; the average cost is more tan \$18,000 per patient and \$54 million overall."

Corr. ID: 4281

Organization: *Not Specified*

Comment ID: 305541 **Organization Type:** Unaffiliated Individual

Representative Quote: In referencing the previously mentioned AVMA the authors of the EIS chose not to include other information that might be of interest to you and /or other readers. For example, nationally one-half of all bites are inflicted by the family dog, and only about 10% of bites are inflicted by dogs unknown to the victim. (AVMA Task Force, 1741).

Also, according to the task force "...Intact (unneutered) male dogs represented 80% of dogs presented to veterinary behaviorists for dominance aggression, the most commonly diagnosed type of aggression. Intact males are also involved in 70 to 76% of reported dog bite incidents." That is

information that might actually be of some practical use to you in formulating your off-leash regulations.(AVMA Task Force, 1733).

Corr. ID: 4668 **Organization:** *Not Specified*

Comment ID: 305533 **Organization Type:** Unaffiliated Individual

Representative Quote: Although few studies seem to exist regarding human psychology and attitudes towards negative behaviors of dogs, NPS needs to recognize that potential safety issues are very real in the minds of visitors and have a significant impact on an individual's psychology and ability to enjoy the visiting experience. Niktina-den Besten (2008) found that the presence of dogs was a significant negative factor in the child's mental map of a neighborhood.

Response:

Chapters 3 and 4 for Visitor Use and Experience have been enhanced to incorporate commenters' thoughts and experiences related to dog walking at each of the sites. The designation of the three user groups, visitors who prefer to walk dogs in GGNRA, visitors who would prefer not to have dog walking in the GGNRA, and visitors who do not have a preference about dog walking in GGNRA, are still used; however, the user groups are further broken down to include users such as visitors with disabilities, visitors with guide dogs, minorities, and children.

Concern ID:

42136

**CONCERN
STATEMENT:**

Commenters state that "Recreation" was not adequately analyzed and not recognized as a resource in the draft plan/EIS. The draft plan/EIS should be revised to include a stand-alone "Recreation" section.

Representative Quote(s): **Corr. ID:** 4409 **Organization:** Montara Dog Group

Comment ID: 200901 **Organization Type:** Non-Governmental

Representative Quote: The Draft Plan/DEIS not only fails to disclose and evaluate the impacts of the alternatives on recreational resources in the context of an urban environment, it dismisses the quality of the urban environment entirely on page 22 where it states, "the quality of urban areas is not a significant factor in determining a dog management plan." As recognized in its enabling legislation, one of the most important aspects of the GGNRA is the sharp contrast between its undeveloped open spaces and the adjacent developed urban environment. The GGNRA's open space and recreational opportunities are intended to provide refuge and relief for nearby urban dwellers.

The impacts on the GGNRA's open space and recreational opportunities should have been evaluated fully in the Draft Plan/DEIS, especially since a NEPA analysis is not limited to the natural environment. According to NEPA, An EIS is required to analyze the human environment. The federal NEPA rules define the human environment and its scope in an EIS as follows:

"Human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment."

When an EIS is prepared and human and natural/ physical environmental effects are interrelated, the EIS should discuss all of these effects on the human environment.

Corr. ID: 4442 **Organization:** San Francisco Dog Owners Group

Comment ID: 305551 **Organization Type:** Non-Governmental

Representative Quote: In the enabling legislation, recreation is listed as one of four values to be protected and maintained, along with natural, historic, and scenic values. Given the importance of recreation to the enabling legislation and the mandate that created the GGNRA, the DEIS should have analyzed the impact of all alternatives on recreation including off-leash recreation. Because it did not, the analysis of the alternatives in the DEIS cannot be accepted.

Indeed, the DEIS assumes that recreation is, by definition, bad. It does not acknowledge the balance between natural, recreational, scenic, and historic values that, according to its enabling legislation, any GGNRA management plan must consider. The DEIS made no attempt to identify, study, or report on any benefits of recreation. This lack must be addressed. The DEIS pits recreation against natural values, rather than exploring a number of reasonable alternatives where the two can work together. This bias against the very concept of recreation calls into question the analysis of the alternatives that was based on it. Therefore the analysis of alternatives cannot be accepted.

The DEIS should have a separate section about recreation and impacts of all alternatives on recreation both on-site and off-site. The section should identify and quantify the recreational uses of GGNRA lands at each site, and also in the surrounding communities. Impacts to recreation resources would be considered significant if they result in a decline in the quality of existing recreational opportunities or in the quantity of available recreational lands/facilities. This section should also consider the cumulative effects of loss of recreational opportunities and access at all sites under discussion. It must also consider impacts of future actions by surrounding communities that would affect on- and off-leash dog walking. For example, the San Francisco Recreation and Park Dept's Natural Areas Program Draft Management Plan calls for the closure of 15% of currently available off-leash areas in city parks. This loss of off-leash access will be significantly amplified by and will significantly amplify reductions in off-leash access in the GGNRA. The GGNRA does not exist in a vacuum. It must consider impacts of its actions on city parks and actions of city agencies on it.

Response:

Recreation is fully analyzed under the Visitor Use and Experience sections in chapters 3 and 4, and some impacts to visitor experience are also analyzed under the Health and Safety sections, including a more comprehensive evaluation of dog walking incidents addressed by law enforcement. Those sections of the document were enhanced to include impacts from dog walking to other recreational opportunities such as running, hiking, biking, roller blading, hang gliding, board sailing, picnicking and sunbathing, as well as impacts to dog walking, including

potential redistributive impacts to adjacent park units both within and external to GGNRA from proposed dog regulations.

Concern ID:
CONCERN
STATEMENT:

42137
Commenters state that there is no nexus between dog impacts and natural resource impacts (vegetation, wildlife, or special-status species).

Representative Quote(s): **Corr. ID:** 4409 **Organization:** Montara Dog Group
Comment ID: 200898 **Organization Type:** Non-Governmental
Representative Quote: The Soils and Geology section (page 225) includes the following statements: "Dogs and dog walkers that do not stay on designated trails and venture off trail create social trails that become denuded of vegetation and result in increased soil compaction." and "Soil compaction is common along social trails that have been created by ' and are heavily used by ' bikers, hikers, runners, and dog walkers." The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. At about 200 pounds per adult, the force that a human exerts on the soil one foot at a time would have a significantly greater impact on soil compaction in a picnic area than the force exerted by even a large 70-pound dog distributing its weight on four paws. The failure to acknowledge that human use has more impact on soils and geology in this regard, compared to dog use, uncritically loads the analysis in favor of restrictions on dogs. While there may be areas in which impacts from dogs are unacceptable, the same criterion holds for impacts from humans, and in most of these areas, dogs and humans are already excluded.

The Soils and Geology section (page 112) on Homestead Valley concludes that, under the No Action Alternative, there would be long-term adverse impacts from "soil compaction, erosion, and nutrient addition..., in areas off the trail since dogs would be under voice control," while under other alternatives it is concluded that the impacts would be negligible because dogs would be under physical restraint. This is an unsubstantiated assumption in support of the underlying bias of the analysis. The analysis does not attempt to connect intensity of use and impact and seems to be based solely on the incorrect assumption that humans and wildlife would have no impact on off-trail areas, and that all impacts can be attributed to dogs.

Response:

As stated in the draft plan/SEIS, there are no scientific studies or monitoring studies that support the impacts to vegetation specifically as a result of dogs. A detailed literature review was conducted (and has been updated as a result of public comments) to further describe impacts on natural resources from dogs. The results of this literature review provide a general nexus for dog-related impacts to vegetation, wildlife, and special-status species.

In some cases, impacts to wildlife and special-status species were revised based on additional data or literature provided in public comments and

through the detailed literature review. Please see chapter 4 for the revised impact analysis for these resources.

Concern ID:
CONCERN
STATEMENT:

42138

Commenters question the lack of data to describe baseline conditions or question the baseline used for comparison.

See also representative quote # 305549 used in concern ID #42151.

Representative Quote(s): **Corr. ID:** 4089 **Organization:** Crissy Field Dog Group
Comment ID: 305538 **Organization Type:** Unaffiliated Individual
Representative Quote: The Draft Plan/DEIS assumes, but fails to demonstrate, the "cause and effect" relationships without site-specific supporting information. For instance, the Draft Plan/DEIS assumes but does not demonstrate that where dogs are present within GGNRA sites, there is a disturbance of natural resources. The Draft Plan/DEIS also assumes but does not demonstrate that the disturbance of resources is attributable to dogs (versus other factors). These assumptions result in flawed conclusions that the mere presence of dogs is equivalent to adverse resource impacts. The findings of an EIS must be based on scientific accuracy and clear evidence in the record. This Draft Plan/DEIS is significantly flawed in that it does not rely on adequate evidence for the conclusions it draws, and in that it fails to clarify its methodology for drawing those conclusions.

The impacts of the No Action alternative are substantially overstated because the Draft Plan/DEIS determines individual areas of compliance with existing dog management strategies without sufficient supporting data and assumes that noncompliance results in adverse impacts. This unsupported logic both overstates the degree of additional management required to address the resource issues, but also misrepresents the relative impacts of the four action alternatives; for example, the public is assumed to comply with management strategies under an action alternative, whereas the public is found to be noncompliant with those same management strategies under the No Action alternative.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 200899 **Organization Type:** Non-Governmental
Representative Quote: The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans.

Corr. ID: 4442 **Organization:** San Francisco Dog Owners Group
Comment ID: 305548 **Organization Type:** Non-Governmental
Representative Quote: There is no baseline data of conditions at each site in the document, something a DEIS is required to include. Indeed, there is no information about how many people visit each site, how many have dogs, how many acres are at each site and how many of those acres are accessible to people with dogs, how many miles of trails are available, what people with dogs do at each site, etc. Without this baseline information, including documented impacts at each site, an informed analysis of

alternatives and selection of a preferred alternative cannot be made.

Corr. ID: 4626

Organization: Marin Unleashed

Comment ID: 264278 **Organization Type:** Non-Governmental

Representative Quote: The Draft Plan/DEIS does not address site-specific resources and the condition/health of those resources. This lack of information results in a vague baseline against which to assess the magnitude of impacts associated with implementing the proposed action and alternatives. With such a vague baseline, it's also difficult to assess the need to change existing dog management strategies.

Select examples:

- a. The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but no data are provided as to where/if they are actually present.
- b. While some special-status species descriptions suggest a nexus between dog activity and the species and/or their habitat (tidewater goby, California red-legged frog), other species descriptions do not (San Francisco garter snake, Coho salmon), and there is a consistent lack of detail describing the existing interaction, if any, between the species and dog activity.
- c. There are inconsistencies regarding the presence of species in the text and in Table 8 in the Special-Status Species affected environment, the information in Appendix H, and the impact analyses in Chapter 4.
- d. In Table 8 on page 246, the GGNRA Location column contains the location for plants that do not exist there according to the text.
- e. For a number of the analyses of Alternatives B-E, the Draft Plan/DEIS states that the area of impact is currently undisturbed. This is not the case, as dogs and humans are currently allowed in those areas.
- f. Additional examples are provided in "Soils and Geology," "Water Quality," and "Biology."

Response:

Additional data has been incorporated throughout the draft plan/SEIS. A detailed literature review was conducted which further documents impacts to park resources from dog walking activity. Additional law enforcement data was also analyzed which documents noncompliance at park sites. The park is aware that other forms of recreation create impacts to park resources; these impacts are captured cumulatively. Please see chapters 3 and 4 for the additional data that has been incorporated for each resource.

Additional data may help to refine the conclusions in the draft plan/SEIS and reduce uncertainty regarding the level of impact on the human environment; however, all NEPA analysis is based on a prediction of potential future conditions and, as such, is always uncertain. In lieu of site-specific data, 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 available data provides sufficient information to allow the decision maker to make a reasoned choice among alternatives.

Concern ID: 42139
CONCERN STATEMENT: Commenters state that the draft plan/EIS fails to analyze indirect impacts to Area B of the Presidio Trust from dog management.

Representative Quote(s): **Corr. ID:** 4390 **Organization:** The Presidio Trust
Comment ID: 209646 **Organization Type:** Federal Government
Representative Quote: 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 letter 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.

Response: Area B of the Presidio Trust will be analyzed in the cumulative impacts section for appropriate resources. A redistribution survey was conducted to determine whether dog walkers would go other areas within or outside GGNRA to walk dogs once the new GGNRA dog walking regulation is

promulgated. Although response rate was low, pertinent information was gained from the survey and results have been added to chapter 4.

Concern ID:
CONCERN
STATEMENT:

42140
Commenters question Geology/Soils impacts.

[For representative quote, see the administrative record - correspondence # 4409, appendix D pages 13-17, chapter 4, points 6-14]

Response:

There are no scientific studies or monitoring studies that support the impacts to soils as a result of dogs. Although there is general agreement that dog activities such as digging and trampling and dog waste affect soils, this impact cannot be isolated or quantified. Therefore, soil impacts were removed from the draft plan/SEIS discussion and placed generally under vegetation section when applicable (dunes, coastal scrub/chaparral). The Fort Funston bluffs are the only geologic features at the park discussed in the draft plan/SEIS. The impacts to geology remain within chapter 4 and are discussed in conjunction with the bank swallow at Fort Funston.

Concern ID:
CONCERN
STATEMENT:

42141
Commenters request that the square footage/acreage/miles of trails differences between all the alternatives be incorporated in the draft plan/EIS.

Representative Quote(s):

Corr. ID: 4281 **Organization:** *Not Specified*
Comment ID: 305540 **Organization Type:** Unaffiliated Individual
Representative Quote: While readers are able to visually compare the various editions of Map 10, it is unfortunate the authors of the EIS did not include the square footage or acreage differences between the five alternatives. I suspect if the area lost to off-leash walking was presented in the EIS in terms of square feet or acres the differences between the existing situation (Alternative A) and your preference (Alternative C) would be staggering.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 310036 **Organization Type:** Non-Governmental
Representative Quote: Table ES-1 lists only areas open to dogs under Alternative A. Although this may simplify the comparison among alternatives (since the closed areas would remain closed under all of the alternatives), it does not clearly portray the existing extent of areas closed to dogs. Not only do the alternatives variously restrict dogs compared to the No Action Alternative, but they also increase restrictions on dogs relative to a baseline that is already restrictive. The Draft Plan/DEIS and Table ES-1 should compare the alternatives in terms of the area and miles of trails available to dogs under each alternative. This is a less subjective way of presenting the alternatives, and it could be useful in evaluating cumulative and synergistic effects. For example, Alternative C takes other available dog use areas within each county into account, presumably in recognition of the high demand for areas where people can take their dogs, and the desire to avoid over-concentrating dog use in any one area. Presenting the

alternatives in terms of available area and trail miles would better allow the reader to appreciate the future impacts relative to current conditions.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 310037 **Organization Type:** Non-Governmental
Representative Quote: Study Area (page 291) The study area is defined as "the area that could be impacted by dog management activities..."
Presumably, this means the entire area within the green line boundaries shown on the maps. However, in practice, the focus of the analysis should be on the specific areas affected by the alternatives, where impacts from dogs may change. In most cases, this is small percentage of the total park areas. Contrary to the statement in this paragraph, the individual study areas have not been described in detail in Chapter 3. It would be helpful to clarify that the alternatives would alter management in selected portions of the study area, and as indicated in earlier comments, to quantify those areas in terms of acres and miles of trails affected by management.

Response: The mileage/acreage available for dog walking for each of the alternatives has been incorporated into the draft plan/SEIS. The draft plan/SEIS addresses only sites that are within NPS-owned and managed acreage (approximately 20,000 acres) or will be managed by the NPS in the near future. The park's legislative boundary encompasses approximately 80,500 acres, including large areas neither owned nor managed by the NPS at this time. Please see chapter 1 and 2 for more details.

Concern ID: 42142
CONCERN STATEMENT: [Literature Review needs to be updated.](#)

Representative Quote(s): **Corr. ID:** 3689 **Organization:** *Not Specified*
Comment ID: 310029 **Organization Type:** Unaffiliated Individual
Representative Quote: The literature summary in the Draft is primarily concerned with the general issues of the disturbance dogs may cause to wildlife. The literature review should be extended to focus on specific disturbance and other conservation issues related to GGNRA. For example, dogs are often mentioned as an especially intense form of disturbance in bird disturbance studies in coastal environments (see above in section "P. 795 - Wildlife / General Wildlife").

Response: Based upon numerous suggestions from commenters of literature to be included (or removed) in the draft plan/EIS and to be used in analysis of impacts, an updated literature review was conducted and the results of this review are discussed in chapter 4. The results of this review provided additional citations for dog impacts/issues and were incorporated in the impacts analysis; these citations are included throughout the draft plan/SEIS as applicable.

Concern ID: 42143
CONCERN STATEMENT: [Commenters question Water Quality impacts.](#)

Representative Quote(s): **Corr. ID:** 4409 **Organization:** Montara Dog Group
Comment ID: 310038 **Organization Type:** Non-Governmental
Representative Quote: 1. General --the Draft Plan/DEIS should be clear under all of the analyses for Alternative A that the impacts would not be new, but rather a continuation of existing/ongoing impacts due to the existing approach to implementing the current GGNRA general management plan.
2. General -- The Draft Plan/DEIS should also be clear in this and other sections that the impact analysis presented for Alternative A is different than the consequences of the No Action alternative were GGNRA to implement an education and adaptive management program under its current plan and policies, which GGNRA could choose to do. The No Action alternative for a management plan is not the same as a "do nothing" alternative. GGNRA can choose to implement its existing plan is a more effective way to meet the purpose and need for the proposal.
3. General -- when impacts are the same across various alternatives for a particular site, the Draft Plan/DEIS should be revised so that the Conclusion Tables contain identical statements.
4. General -- the Conclusion Tables should be grouped together for each site. This would make comparing the various alternatives for each site easier and make the tables more useful.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 310040 **Organization Type:** Non-Governmental
Representative Quote: 7. Page 460, Assessment Methodology--the Draft Plan/DEIS should describe how impacts are analyzed qualitatively.
8. Page 468, Paragraph 1-- is it possible for the increased use at adjacent parks to be concentrated at one adjacent park? Would "impacts on water quality in adjacent lands" still not be "expected to be higher than current conditions" if increased use was concentrated in a particular adjacent park? This comment should be addressed in all instances in the water quality section where this could occur.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 310039 **Organization Type:** Non-Governmental
Representative Quote: 5. Page 459, last paragraph, states "Impact at the most would be negligible; therefore, impacts to seeps and springs from dogs are not discussed further." If impacts to seeps/springs are not discussed further because the impacts are negligible, then why are there so many discussions in subsequent pages about negligible impacts involving other types of water resources? The Draft Plan/DEIS should be made more consistent by not discussing any negligible impacts in subsequent pages of the water quality section.
6. Page 460, Assessment Methodology -- the Draft Plan/DEIS should make an assumption under Assessment Methodology that the public would comply with park/dog regulations and requirements, then remove all of the "assuming compliance" (and similar) statements in the subsequent pages of the water quality section. Also, the Draft Plan/DEIS should provide examples of park/dog regulations and requirements, such as being on leash or properly disposing of dog waste.

Corr. ID: 4591 **Organization:** *Not Specified*
Comment ID: 305575 **Organization Type:** Unaffiliated Individual
Representative Quote: Page 461

DEIS: "A substudy of the San Francisco Sewage Master Plan determined that bacterial contamination of waters off Ocean Beach was significant due to dog waste deposited along the shoreline (NPS 1999, 21)"

This is a very misleading reference to a nonexistent document. NPS 1999 is not "a substudy of the San Francisco Sewage Master Plan;" NPS 1999 is Natural Resources Section, Resources Management Plan, Golden Gate National Recreation Area, December 1999. It is likely that no such substudy of the San Francisco Sewage Master Plan exists. During Negotiate Rulemaking in 2007, I challenged GGNRA's claim to dog waste contamination at Ocean Beach, writing, "Unless the substudy that made this claim can be presented for examination, this claim should be stricken from the Attributes Table." The NPS reply was, "[I] put in a call to SF PUC Water Quality Bureau and others to try track down substudy; so far no luck ' they are not aware of any such study. We may have to strike this from Attributes table if neither we nor city can locate. (SES)" It is now 2011. No substudy has been produced, but GGNRA continues to make the claim and refer to the nonexistent document, with a citation to make it appear that the claim comes from a real document.

Response:

There are no scientific studies or monitoring studies that discuss impacts to water quality as a result of dogs. There is a general agreement that dog waste and nutrients may affect water quality, but this impact cannot be isolated or quantified. Further, the park was able to confirm with the SFPUC Water Quality Bureau that the referenced sub-study does not exist. All references to the NPS 1999 study have been removed from the draft plan/SEIS. In addition, since no site-specific studies support the impact analysis, the water quality discussion/impacts have been dismissed from further analysis in chapter 1.

Concern ID:
CONCERN
STATEMENT:

42144
[The Socioeconomics/Environmental Justice Sections are inadequate - ethnic groups and/or minorities that use the park have not been properly included in the discussion.](#)

Representative Quote(s): **Corr. ID:** 4443 **Organization:** San Francisco Dog Owners Group
Comment ID: 305578 **Organization Type:** Non-Governmental

Representative Quote: The DEIS contains no information on the ethnic makeup of people who do visit the GGNRA. Dog walkers are perhaps the most diverse group of park users in the GGNRA. Go out to Fort Funston or Crissy Field and you will see kids, seniors, people with disabilities, gay and straight, all ethnic groups, people from all religions and countries, and people from every social and economic class walking with their dogs. The restrictions on off-leash access in the action alternatives will have a serious negative impact on the thousands of ethnic minorities who currently walk with dogs in the GGNRA. This impact is not addressed in the DEIS. Analysis of alternatives that does not consider this impact cannot be accepted.

Corr. ID: 4443 **Organization:** San Francisco Dog Owners Group
Comment ID: 264248 **Organization Type:** Non-Governmental
Representative Quote: The Roberts study was not "on ethnic minority visitor use experience at GGNRA." It 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.

The DEIS contains no information on the ethnic makeup of people who do visit the GGNRA. Dog walkers are perhaps the most diverse group of park users in the GGNRA. Go out to Fort Funston or Crissy Field and you will see kids, seniors, people with disabilities, gay and straight, all ethnic groups, people from all religions and countries, and people from every social and economic class walking with their dogs. The restrictions on off-leash access in the action alternatives will have a serious negative impact on the thousands of ethnic minorities who currently walk with dogs in the GGNRA. This impact is not addressed in the DEIS. Analysis of alternatives that does not consider this impact cannot be accepted.

Response:

The reference made to this study misrepresents the study's findings. An accurate description of the focus groups and what the report does and does not do has been updated and included in the plan/EIS. Please see chapter 3, Visitor Use and Experience, Environmental Justice for additional information. As described in chapter 1, Issues and Impact Topics Dismissed From Further Analysis, GGNRA park operations and visitors create social and economic links between the park and the surrounding community. However, dog management policies are not expected to have a noticeable impact on the economic links between GGNRA and the city of San Francisco. As a result, potential impacts on social and economic conditions would be highly unlikely to exceed a "negligible" threshold, and are therefore eliminated from detailed consideration. Environmental Justice, including a more detailed discussion regarding ethnic minority groups, is discussed under Visitor Use and Experience in chapters 3 and 4.

Concern ID:
CONCERN
STATEMENT:

42145
[Commenters question assumptions concerning site usage and visitation trends/rates at the park.](#)

Representative Quote(s): **Corr. ID:** 4442 **Organization:** San Francisco Dog Owners Group
Comment ID: 264238 **Organization Type:** Non-Governmental
Representative Quote: The DEIS must quantify how many people typically visit each site in the GGNRA, how many people can be accommodated in the areas remaining open to off-leash dog walking under

each alternative, and how many people will be forced to go elsewhere under each alternative. This was not done and must be added.

Corr. ID: 4693 **Organization:** *Not Specified*

Comment ID: 305536 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS fails to provide documentation for the enforcement data presented in the document or put the data into context in terms how dog related violations compare to overall violations. See Chapter 3, page 269 for one example of this issue. Further to this point the DEIS does not provide any reasonable evidence that visitation to the park will increase through the 20-year plan horizon of that such increases will result in more dog related violations. In chapter 3, page 269, the DEIS states that "The DEIS is clear that there is no correlation between population growth and annual visitation"

Response:

Additional data on park visitation at the more heavily visited sites was included in the draft plan/SEIS. Park visitation was characterized for Muir Beach, Rodeo Beach, Crissy Field, Baker Beach, Ocean Beach, and Fort Funston. Monthly visitation was estimated based on the survey and visitor use statistics compiled by the park. In addition, the overall park visitation trend was also updated. Please see Visitor Use and Experience in chapters 3 and 4 for more details.

Concern ID:

42146

**CONCERN
STATEMENT:**

Commenters question the park's own data (LE data showing incidences and visitor use data) - regarding noncompliance or dog conflicts at the park.

For additional representative quote, please see Concern 30541 (GA2000), Comment 200893.

Representative Quote(s): **Corr. ID:** 4693 **Organization:** *Not Specified*

Comment ID: 305537 **Organization Type:** Unaffiliated Individual

Representative Quote: SUMMARY OF VISITOR USE AND PET RELATED CITATIONS, WARNINGS AND REPORTS TAKEN AT GGNRA (including reference to Appendix G, Golden Gate National Recreation Area - Pet related Incident; Law Enforcement and US Park Police data) Is flawed because :

1) 2007-2008 data are too old to characterize the affected environment of 2011

Response:

Additional law enforcement data has been incorporated into the draft plan/SEIS and has been reanalyzed. New law enforcement data is located in chapters 3 and 4 under visitor use and experience.

Concern ID:

42147

**CONCERN
STATEMENT:**

Climate change was not considered in the draft plan/EIS.

For additional representative quote, please see Concern 31921 (MT1000), Comment 210063.

Response: Impacts of dog walking on climate change are considered negligible for all alternatives. Updated dismissal text and rationale was included in chapter 1 of the draft plan/SEIS.

Concern ID: 42148
CONCERN STATEMENT: Shorebird impacts analysis needs to be strengthened.

Representative Quote(s): **Corr. ID:** 4089 **Organization:** Crissy Field Dog Group
Comment ID: 208362 **Organization Type:** Unaffiliated Individual
Representative Quote: In many places, the Draft Plan/DEIS does not provide any data on actual impacts by dogs in areas being proposed for new dog walking restrictions. In places where data are provided, the Draft Plan/DEIS makes undocumented assumptions that there are unacceptable impacts and that dogs are the culprits. For example, in the Western snowy plover sections of Chapters 3 and 4, the Draft Plan/DEIS explains that people, as well as dogs, who traverse dune areas disturb shorebirds. Monitoring surveys observed 48 off-leash dogs chasing birds over a period of 12 years. However, in this case the birds continue to return to the area each year. Therefore, there might or might not be a problem - the Draft Plan/DEIS does not provide substantive data to help the reader decide. If there is a problem, the Draft Plan/DEIS doesn't provide logical conclusions as to whether access should be limited for people, for dogs, or both.

The Draft Plan/DEIS presents no information supporting the finding that dogs are currently impacting shorebirds and marine mammals. Therefore, there is no scientific rationale for prohibiting dogs from beach areas under Alternative D to "protect shorebirds and stranded marine mammals," as stated on page 151.

Response: Impacts to wildlife have been re-analyzed. A detailed literature review was performed and new studies/data have been incorporated. Please see the Wildlife section in chapter 4 for more details.

Concern ID: 42149
CONCERN STATEMENT: Commenters state that GGNRA has not evaluated the effectiveness of voice control - the available information (including a FOIA request of citations) suggests that voice control is not effective in protecting wildlife or visitor experience.

Representative Quote(s): **Corr. ID:** 4668 **Organization:** Not Specified
Comment ID: 305535 **Organization Type:** Unaffiliated Individual
Representative Quote: Furthermore, although relying on the concept of voice control for decades, it does not appear that GGNRA has ever evaluated the effectiveness of voice control. In responding to a FOIA request for records of citations issued related to failure to exercise voice control, GGNRA reported that they had no way of searching their records for that information. Available information suggests that voice control is not effective in protecting wildlife or visitor experience.

Corr. ID: 4695 **Organization:** Golden Gate Audubon Society
Comment ID: 305577 **Organization Type:** Conservation/Preservation
Representative Quote: The DEIS fails to establish that "voice control" is a valid method of controlling off-leash dogs. As demonstrated in the Criminal incident Reports produced by the Park Service's rangers, dogs that are ostensibly under "voice control" do not respond accordingly. GGAS is unconvinced that this is a valid means for protecting park users, wildlife, habitats and other dogs.

Response: The definition of voice control has been expanded and clarified. Additional education and enforcement will also focus on voice control effectiveness. Please see chapter 2 for additional details.

Concern ID: 42150
CONCERN STATEMENT: The draft plan/EIS does not adequately address impacts to other parks (dog parks, National Parks, County parks, State parks, etc.).

For additional representative quote, please see Concern 29630 (LU3010), Comment 264237.

Representative Quote(s): **Corr. ID:** 4409 **Organization:** Montara Dog Group
Comment ID: 200902 **Organization Type:** Non-Governmental
Representative Quote: The section should also describe and evaluate the indirect impacts of the alternatives on areas in close proximity to the GGNRA, including indirect impacts that substantially impair or diminish the features, attributes, or activities currently available to nearby parkland visitors. Although the Visitor Use and Experience analysis provides some information on indirect impacts on nearby parkland, it fails to provide a detailed evaluation of the potential for an increase in visitor use of nearby recreational facilities. Such an increase in visitor use could lead to a decrease in visitor enjoyment of those areas, an increase in enforcement issues, and/or other related environmental effects. In addition, the Visitor Use and Experience analysis related to indirect effects on nearby parklands fails to provide a reasoned explanation for its conclusions. For example, on page 1412, the draft EIS states that the impacts on nearby parks under Alternative D, which prohibits dogs in the parking and picnic areas at Stinson Beach are negligible and "minor." Given that dogs would no longer be allowed in these areas under this alternative, it is unclear how the EIS authors determined this impact to be negligible and "minor" without a rational explanation for this conclusion. Not allowing dogs in areas where dogs were they were allowed previously would indeed affect the use of adjacent recreation areas and the EIS needs to disclose this impact. Thus, the recreation resources section of the draft EIS should consider impacts related to the loss of recreational opportunities and access to nearby recreational facilities with detailed explanations for all conclusions.

Response: A redistribution survey was conducted to evaluate where dog walkers would choose to walk dogs with a new GGNRA dog walking regulation in place. Impacts to these areas were evaluated under each resource in the cumulative impact analysis. Please see chapter 4 for more details.

Concern ID:
CONCERN
STATEMENT:

42151

Commenters state that the compliance-based management strategy is unclear and omits critical information that is not clearly defined in the draft plan/EIS.

For additional representative quote, please see Concern 29651 (CB1000), Comment 208381.

Representative Quote(s): **Corr. ID:** 4281

Organization: *Not Specified*

Comment ID: 305542 **Organization Type:** Unaffiliated Individual

Representative Quote: In chapter 2 of the EIS the CBMS process is generally described. Later in the EIS we are told in summary: "...Compliance-based management strategies has been designed to ensure that compliance with the Code of Federal Regulations (CFR) applicable to dog management is high to ensure protection of park resources, visitors, and staff. If noncompliance occurs at a site, compliance-based management strategies 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 regulated off-leash walking areas (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 special use permit (SUP) restrictions. If noncompliance continues and compliance falls below 75 percent in a management zone (measured as the percentage of total dogs/dog walkers observed during the previous 12 months not in compliance with 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, provide beneficial impacts where dog walking is reduced or eliminated".

Unfortunately as described this process could be easily abused by those charged with administering the process. There does not appear to be any systematic method planned, as opposed to "random"

Corr. ID: 4281

Organization: *Not Specified*

Comment ID: 305543 **Organization Type:** Unaffiliated Individual

Representative Quote: When all is said and done, the future of dogs walking in the GGNRA will live or die based upon how the proposed Compliance-Based Management Strategy is established and administered. If administered fairly and efficiently it could work to the benefit of all visitors to the GGNRA. If on the other hand it is administered without transparency and a legitimate opportunity for public participation and verification, it will serve as a lightning rod for dissension and in all likelihood years of litigation. The cornerstone to all of this is the legitimacy of the planned monitoring for establishment of baselines and levels of non-compliance with park regulations.

Perhaps it is simply a matter of semantics, but because the establishment of baselines has such critical importance, one would think the National Park Service would want to be extremely diligent in using its very best efforts to assure the information collected is as accurate as possible, and that the data would be collected systematically and scientifically rather than performed "randomly".

As "the next most restrictive dog management regulation" below voice control or off-leash is on-leash followed by "no dogs," justice dictates this must be a fair and open process. Much like a death sentence, the proposed CBMS provides that once a restriction is imposed it cannot be reversed even if behaviors substantially improve.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 200900 **Organization Type:** Non-Governmental
Representative Quote: Montara Dog Group certainly realizes and accepts the need to ban dogs (and people) from certain sensitive habitat areas and will cooperate fully to help protect those areas when they are identified by scientific studies.

We also have issues with the "Compliance-Based Management Strategy" discussed on page 1116 of the report. Although we feel that this could work, if properly implemented, there is insufficient detail provided on how compliance is going to be monitored. The GGNRA should reach out to dog user groups for help in implementing a strategy of this type. As responsible dog owners, we do not like to see dogs and/or their owners misbehaving any more than others do. In fact, it upsets us more, because the bad behavior on the part of a few sullies the reputation of us all. We would be glad to accompany GGNRA monitors to implement a program of this type, but it needs to be fair and well thought out. Otherwise, it will not receive public support, and be thought of as a "poison pill" inserted by GGNRA into the Dog Management Plan as a way to automatically avoid the necessity of public input before placing even further restrictions on dog walking.

Corr. ID: 4442 **Organization:** San Francisco Dog Owners Group
Comment ID: 305549 **Organization Type:** Non-Governmental
Representative Quote: The DEIS calls for a Compliance-Based Management Strategy (CBMS), that will change the status of on- and off-leash to "no dogs" areas in the GGNRA based solely and simply on whether there is enough compliance with the restrictions proposed in the Preferred Alternative. The DEIS assumes non-compliance results in negative impacts on the environment, but provides no evidence to support this assumption. Without such evidence, the DEIS cannot say that the CBMS will result in any additional protection of resources. There is, therefore, no justification for the additional restrictions on dogs provided by CBMS, and it should be removed.

In addition, the DEIS provides no information on how this compliance monitoring will be done or by whom. That information is critical to evaluate the value and possible negative and positive aspects of the CBMS and must be provided in a DEIS that assigns it such an important role. Without it, any

discussion of how monitoring will be done and by whom, the CBMS cannot be accepted.

Response:

The monitoring-based management strategy (MMS) (formerly the compliance-based management strategy) has been revised based on comments received in the public comment period. Changes to the MMS have been made in chapters 2 and 4 of the draft plan/SEIS.

Concern ID:

42152

CONCERN STATEMENT:

Commenters describe inconsistencies in the impact analysis conclusions for certain resources (not editorial changes).

[For representative quotes, see the administrative record - correspondence # 4089, appendix D pages 9-19 and appendix E pages 20-21, chapter 4, points 1-8]

Response:

The impact analysis has been revised to include additional data. The revised impact analysis is more clear and consistent. Please see chapter 4 for additional details.

Concern ID:

42153

CONCERN STATEMENT:

Commenters do not agree with the defined "thresholds" in the document, including the duration, context, and intensity of the impact.

[For the full text of the representative quote, please see the administrative record for correspondence #4089, appendix D, pages 15-17, point 9]

Representative Quote(s): **Corr. ID:** 4089 **Organization:** Crissy Field Dog Group
Comment ID: 310042 **Organization Type:** Unaffiliated Individual
Representative Quote: Appendix D:

The impact thresholds are critical to the outcome of the analysis, and the impact thresholds described in this section provide a great deal of leeway to the analyst.

lack of a definition or bounds on what constitutes adverse soil disturbance is a weakness of the analysis, which might either be rectified by carefully defining the term, or by avoiding its use altogether due to its inherent vagueness.

Response:

The thresholds for the impact analysis in the draft plan/EIS have not been revised. Per Director's Order 12, NPS uses thresholds which include the duration, context, and intensity to describe environmental impacts to each resource topic. Additional data has been incorporated into the impact analysis as additional rationale for impact determinations. Please see chapter 4 for additional details.

Concern ID:

42154

CONCERN STATEMENT:

Commenters question impacts that have been described for a dog on a 6-foot leash extending 6 feet from the edge of trails.

Representative Quote(s): **Corr. ID:** 4089 **Organization:** Crissy Field Dog Group
Comment ID: 310043 **Organization Type:** Unaffiliated Individual
Representative Quote: Marin County Sites -- Homestead Valley (pages 301-307)

Alternative A: No Action (page 301)

The Homestead Valley impact analysis is the first unit in this section that presents a discussion comparing impacts of No Action (which allows off-leash use) with the action alternatives, (none of which now allow off-leash use). The text states that "Even though this site has low visitor use and low numbers of citations and incident reports related to dog activities, soil compaction and nutrient addition and possible erosion from dogs is assumed to be currently happening along the fire road/trails and in off-trail areas throughout the site." This statement indicates that no evidence of impacts of dog use is needed in order to conclude that the No Action Alternative has adverse impacts on soils and geology.

Similar conclusions reflect a bias at many of the other sites discussed. The discussion of the No Action Alternative is based on little or no data (as indicated by the lack of data provided in Chapter 3). The facts that are presented indicate that there is no justification for a change in management to protect soils and geology.

Alternatives B and C and E all describe compaction of soils within a strip 6 feet adjacent to the Homestead Fire Road as an impact on soils. Given the low use of the area, the low level of risk from some slight amount of compaction that may occur adjacent to a fire road, and the fact that the 6-foot strip assumes that the dogs walk directly alongside the owner, who walks at the extreme edge of the fire road, the extreme precision of this analysis is notably inconsistent with the general lack of specificity and precision presented in the discussion of the Affected Environment. Presenting the impact analysis in such precise terms gives the misleading impression that the analysis is more accurate and more certain than it is. This generally applies to fine distinctions made between the impacts of the alternatives. At the level of accuracy possible with the information available, "no impact," "negligible impact," and "minor impact" should probably all be considered synonyms with respect to soils and geology.

Response:

An analysis of the impacts of dogs on soils was eliminated from further consideration in the draft plan/SEIS. A detailed literature review found few investigations documenting the isolated effects of dogs on soils in recreational settings, and no site-specific peer reviewed studies have been conducted that document impacts from dogs to soils in GGNRA. Therefore, a discussion of soils was integrated into the vegetation section of the draft plan/SEIS. The impact analysis for dogs along trails assumes that impacts from dogs on a leash would extend 6 feet on either side of the trail. This assumption was used as a worst case scenario because dog walkers would not always walk in the middle of the trail. Either through preference, or when they need to pass another visitor, the dog walker would move towards the edge of the trail. A more detailed description of this assumption has been included in chapter 4.

Concern ID: 42156
CONCERN STATEMENT: Commenters do not agree with impacts described for marine mammals.

Representative Quote(s): **Corr. ID:** 4089 **Organization:** Crissy Field Dog Group
Comment ID: 310044 **Organization Type:** Unaffiliated Individual
Representative Quote: Pages 233-234. Part of the rationale for prohibiting dogs from beach areas under Alternative D is to "protect shorebirds and stranded marine mammals", but there is no information given here to support that dogs are currently impacting shorebirds and marine mammals; therefore, the No Action Alternative does not significantly impair natural values. Chapter 1 "Dogs and Wildlife" does not report any interactions between marine mammals and dogs.

Response: Additional stranding data at GGNRA sites for marine mammals were available and included in the draft plan/SEIS. The impacts to marine mammals were then re-evaluated and NPS feels that based on the data and information available, the impact analysis is accurate.

Concern ID: 42157
CONCERN STATEMENT: Commenters state that mitigation needs a better description in the document - what will mitigation include and how will it reduce impacts?

Representative Quote(s): **Corr. ID:** 4089 **Organization:** Crissy Field Dog Group
Comment ID: 310046 **Organization Type:** Unaffiliated Individual
Representative Quote: Page 545, Paragraph 2 -- the EIS includes no discussion of what "additional actions" would potentially have adverse impacts on vegetation and what types of impacts. Text also states that "mitigation for these projects would reduce the potential for impacts." However, there is no discussion as to what kind of mitigation would occur and how it would reduce impacts. Therefore, no measure of a quantifiable reduction of impacts can be determined by mitigation efforts. For projects outside of GGNRA, it is assumed that mitigation would be applied. There is no evidence to support this assumption. More specific information is needed to adequately assess and comment on impacts. This comment applies to this same text where it is repeated in the cumulative impact analysis throughout the section and the wildlife and special-status species sections.

Response: Mitigation is addressed through the Monitoring Management Strategy.

CR2010 – CULTURAL RESOURCES: AFFECTED ENVIRONMENT

Concern ID: 29401
CONCERN STATEMENT: The plan does not show the importance of the cultural resources, future cultural resources, or detrimental effects from dogs. The plan does not clearly state how dogs actually impact cultural resources (i.e., forts) and that visitors impact the cultural resources more than dogs. Cultural resources in the GGNRA should not just include physical resources, but also the local culture, which is defined in part by dog walking.

Representative Quote(s): **Corr. ID:** 377

Organization: *Not Specified*

Comment ID: 181164 **Organization Type:** Unaffiliated Individual

Representative Quote: I do not actually see how dogs damage cultural resources. What can a dog do to a fort? Erosion does more than the dogs can ever do. Is there really some documentation about dog damage to cultural resources? You really do not say how the dogs damage such things.

Corr. ID: 1850

Organization: *Not Specified*

Comment ID: 192045 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS fails to provide evidence for impact of dogs on future plans for restoration and enhancement. The DEIS fails to demonstrate relevancy. Please remove this from objective.

Comment: The DEIS fails to prove relevance of future cultural projects. The DEIS should be revised to remove this as objective.

Comment: The DEIS fails to show any detrimental effects. The DEIS should be revised to reflect lack of evidence.

Corr. ID: 1850

Organization: *Not Specified*

Comment ID: 192080 **Organization Type:** Unaffiliated Individual

Representative Quote: With regard to the U.S. Coast Guard Station at Crissy Field, the DEIS states: "In the past some of the individual juniper plantings within the U.S. Coast Guard Station's perimeter hedge have died and dog urine is believed to have contributed to the loss of at least one plant." Comment: The DEIS fails to establish the materiality of one plant, the cause of death of one plant, and the relevance of one plant as a "cultural resource." The DEIS should be revised to remove the above reference entirely based on the following:

- The hedge is newly planted to replace the historic cypress hedge planted in 1915 that needed to be replaced due to age and effects of nearby remediation and renovation of Airfield, etc. The new plantings, particularly one plant, hardly fit into definition of a "cultural resource."

- Since more than one plant died, there were other factors at work than simply dog urine which is only cited as a possible contributing factor in the death of one plant.

- One of the buildings of the Coast Guard Station adjacent to the hedge has paint peeling down to the wood due to the weather effects that is a much more material problem with this cultural icon.

- There is ample evidence of "wear and tear" on grounds and facilities throughout the GGNRA lands due to the high level of use by people engaged in a variety of activities in this urban environment. The possible loss of one plant from dog urine should more appropriately be included in the general maintenance requirements for the area.

Corr. ID: 1957 **Organization:** *Not Specified*
Comment ID: 192710 **Organization Type:** Unaffiliated Individual
Representative Quote: "Protect cultural resources from the detrimental effects of dog use" - what does this mean? How many dogs "use" cultural resources? Aren't people more likely to commit "detrimental effects"?"

Corr. ID: 4035 **Organization:** *Not Specified*
Comment ID: 227708 **Organization Type:** Unaffiliated Individual
Representative Quote: Recreation Heritage and Culture: The Park Service seems to attribute physical structures to Cultural Resources and is ignoring the important cultural components. The military structures and Native American heritage is important to preserve but so is the the development and maintenance of the local culture. Nothing is more fundamental to the Bay Area or the GGNRA than the community gatherings and bonding experiences that happen on beautiful days at high visitation places such as Ocean Beach, Crissy Field, Muir Beach, Rodeo Beach, Fort Funston, Mori Point/Sharp Park, etc.

Response: The cultural resources sections in chapters 3, Affected Environment and chapter 4, Impact Analysis have been revised. Please see chapter 3 and 4, Cultural Resources for more details.

Concern ID: 29403
CONCERN STATEMENT: Commenters stated that many of the cultural resources described in the draft plan/EIS are not within dog walking areas and that impacts to cultural resources cannot be attributed to dog walking. For example, impacts at Baker Beach should be clearer; the World War II battlements do not require protection from dogs/children; the reference to "headquarters" at Fort Scott should not be included (located outside a dog walking area); there are no cultural resources at Ocean Beach from the Cliff House south.

Representative Quote(s): **Corr. ID:** 2873 **Organization:** *Not Specified*
Comment ID: 202709 **Organization Type:** Unaffiliated Individual
Representative Quote: There are stated concerns regarding the preservation of rusting, rotting World War II battlements (which of course have no actual involvement with the war other than as visible tributes to overly rampant paranoia as they were never close to the war front). These are referred to as cultural resources and presented as something to protect although the real threat to their continued degradation are the children that play in them not the dogs that pass by.

Corr. ID: 4016 **Organization:** San Francisco resident
Comment ID: 206835 **Organization Type:** Unaffiliated Individual
Representative Quote: - In addition, the mention of "headquarters" in the text of Fort Scott implies that the "campus" including the headquarters building, barracks buildings and parade grounds are part of the DEIS area of concern. These cultural resources are geographically distinct from all of the dog-walking areas included in the DEIS. The reference to the "headquarter" should be re-written clearly.

Corr. ID: 4016 **Organization:** San Francisco resident
Comment ID: 206833 **Organization Type:** Unaffiliated Individual
Representative Quote: - In referencing Chrissy Field the DEIS states "original buildings-hangars, barracks, guardhouse, etc." are included in the "Affected Environment". Most of these structures are located on the south side of Mason Street, geographically located across the street from the dog-walking boundary and in visits to the hangar areas of Chrissy Fields, dog-walking is not an activity found in this area where public and retail-oriented spaces are surrounded by parking areas.

Corr. ID: 4016 **Organization:** San Francisco resident
Comment ID: 206834 **Organization Type:** Unaffiliated Individual
Representative Quote: - In reference to "Fort Winfield Scott" section of the DEIS, this section should be renamed to "Fort Winfield Scott Seacoast Fortifications" or entirely removed to itemize only embattlements that are contained within the Baker Beach dog-walking areas. In addition these fortifications should be itemized within the text and on the map in a consistent manner, and the "damage" that is caused by dog-walking activities to these fortifications should also be realistically discussed.

Corr. ID: 4016 **Organization:** San Francisco resident
Comment ID: 206830 **Organization Type:** Unaffiliated Individual
Representative Quote: First, I am strongly opposed to GGNRA's inclusion of a many cultural resources in the DEIS when, simply-stated, many of these cultural resources are not within the dog-walking areas and some of the "negative activities" cited in this section cannot be attributed to dog-walking activities.

Corr. ID: 4679 **Organization:** Ocean Beach Dog
Comment ID: 227552 **Organization Type:** Civic Groups
Representative Quote: The idea that cultural resources such as buried missile silos at Fort Funston require protection from dogs trampling, digging or urinating is far-fetched at best. I would point out that the larger size and weight of humans would be a greater threat to trample notable sites than would dogs. With respect to missile silos at Fort Funston I would not assume all urine deposited would be that of the canine visitors. The GGNRA still has not installed any permanent bathrooms for the many human visitors at Fort Funston. In fact, it seems the GGNRA has little regard for the enjoyment of these resources.

Response: The cultural resources sections in chapter 3, Affected Environment and chapter 4, Impact Analysis have been revised. Please see chapter 3 and 4, Cultural Resources for more details.

CS1300 – CATTLE/SWEENEY: DESIRE OTHER ALTERNATIVE

Concern ID: 29367
CONCERN STATEMENT: Commenters support either alternative A or E for Sweeney Ridge because these alternatives provide the most on-leash dog walking at the site and therefore meet the need for open recreational space. Reasoning provided by

commenters included a lack of sound science regarding impacts from dogs and the infrequent use of the site.

Representative Quote(s): **Corr. ID:** 1893 **Organization:** University of San Francisco
Comment ID: 200620 **Organization Type:** Unaffiliated Individual
Representative Quote: There is a severe shortage of open-space where I can walk with my dog in San Mateo County. Loss of this the Sweeney Ridge hiking trails would only exacerbate this problem, and would degrade the quality of life in this county. Needless to say, I prefer Alternative A or Alternative E, which would provide the most access

Corr. ID: 2295 **Organization:** *Not Specified*
Comment ID: 226682 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a Pacifica resident who has been using the Sweeney Ridge Trail System for over 3 years. I typically hike and run the trails 4 days a week with my dog on-leash (6 feet in length) between the Mori Ridge trailhead and Portola Discovery Site or SFPUC Portola Gate. I have also used the trail system for regular hiking with my family without dogs as well as mountain biking. I am fully in support of continued multi use of the Sweeney Ridge Trail System for all uses including dog walking (leash only), hiking, trail running, mountain biking, horseback riding, wildlife watching, etc. I am opposed to GGNRA Draft Dog Management Plan's Preferred Alternative, which would ban on-leash dog walking on the Sweeney Ridge Trail System. My preference would be for Plan adoption of Alternative A (Map 19-A), which would allow continued multi use (including on-leash dog walking) throughout the Sweeney Ridge Trail System with the exception of the Notch Trail, which would allow hiking only.

Corr. ID: 4118 **Organization:** *Not Specified*
Comment ID: 208518 **Organization Type:** Unaffiliated Individual
Representative Quote: SWEENY RIDGE - I support Alternative A, No Action (in harmony with 1979 Pet Policy). This area is relatively infrequently used. Even if usage were to increase, it does not require a change in Policy.

Corr. ID: 4598 **Organization:** *Not Specified*
Comment ID: 210069 **Organization Type:** Unaffiliated Individual
Representative Quote: After much consideration, I support Alternative A, the No Action alternative and would also include the Newly-acquired areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra) in San Mateo County.

The DEIS shows a bias against the No Action alternative or variations on that alternative. There are other areas in the GGNRA such as Ocean Beach, where the existing 1979 Pet Policy has been working and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site-specific information that these areas are inappropriate for continued dog walking.

Response: Alternatives A and E were not selected as the preferred alternative; however, the preferred alternative was modified to include two trails for on-leash dog walking at Sweeney Ridge. Please see chapter 2, Preferred Alternative for Sweeney Ridge/Cattle Hill for additional information on on-leash dog walking.

Concern ID: 29369
CONCERN STATEMENT: There is support for alternative B because visitors want a no-dog experience at this site and are concerned about impacts to natural resources as a result of dogs.

For representative quotes, please see Concern 29335 (MR1100), Comment 203736.

Response: Alternative B was not selected as the preferred alternative. However, dog walking would be limited to three trails on the perimeter of core habitat and that are outside mission blue butterfly habitat. Please see chapter 2, Preferred Alternative for Sweeney Ridge/Cattle Hill for additional information on no dog experience opportunities.

CS1400 – CATTLE/SWEENEY: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29371
CONCERN STATEMENT: Commenters have suggested areas for off-leash, on-leash walking, and no dogs. Some commenters suggest that that Sweeney Ridge should be open to off-leash dog walking or ROLAs because the site has low use and significant open space, and would provide a balance between recreational needs and natural resource protection. Suggested ROLAs included the trails/fire roads on Sweeney Ridge. Trails where commenters presented both on- and off-leash suggestions included Sneath lane to Fassler, the road to the Nike missile site, the Baquiano trail, and notch trail.

For representative quote, please see Concern 29271 (MP1400), Comment 204113.

Representative Quote(s): **Corr. ID:** 841 **Organization:** *Not Specified*
Comment ID: 186202 **Organization Type:** Unaffiliated Individual
Representative Quote: Sweeney Ridge: like Milagra Ridge, this trail/fire road is virtually devoid of anything more than the occasional person. After traversing the steep up/down of the canyon up to the ridgeline, I have rarely ever seen another person at all. The trail is not for the faint-of-heart, and this generally scares off anyone except the most physical/avid hikers. I'd prefer to see this area completely off-leash and voice control for dogs for those reasons. It is one of the best places to have significant open-space with virtually no other human contact to walk dogs.

Corr. ID: 2295 **Organization:** *Not Specified*
Comment ID: 264219 **Organization Type:** Unaffiliated Individual
Representative Quote: Therefore, why does the Dog Management Plan's Preferred Alternative propose to not allow dog walking on-leash within the Sweeney Ridge Trail System? As described throughout the Dog

Management Plan, physically restraining dogs on-leash would protect habitat and wildlife off trail and would eliminate chasing after wildlife. Please explain.

Corr. ID: 3812 **Organization:** *Not Specified*
Comment ID: 208447 **Organization Type:** Unaffiliated Individual
Representative Quote: 1. I believe that leashed dogs should be allowed on the paved road at Sweeney Ridge. That is, the road between Sneath Lane and the Nike Missile Site. This would serve the park's goal of keeping the wilder sections of the site dog-free, but allow local residents the opportunity to walk on a portion of the park.

Corr. ID: 4640 **Organization:** *Not Specified*
Comment ID: 227731 **Organization Type:** Unaffiliated Individual
Representative Quote: Sweeney Ridge

Allows balanced areas for dog recreation plus one trail for no dogs even though overall visitation on the "no dog" trail will probably be less because of not allowing dogs. While there is no evidence of dogs impacting the Mission Blue Butterfly, Notch Trail includes the habitat for the butterfly so even remote impacts are eliminated.

- Trails from Sneath Lane entrance to Fassler entrance and dirt trails south of that path (plus Cattle Hill and road to the Nike Missile Site)
- Trail from the Shell Dance Nursery to the Nike Missile Site
- Notch Trail

Note that on the Bay side nearby Sawyer Camp Trail and San Bruno Mountain do not allow any dogs. On the Coast side nearby San Pedro Valley does not allow dogs.

I doubt there is a significant number of visitors that are truly afraid of dogs that will visit Sweeney Ridge because of the large, wild predators in the park

Corr. ID: 4688 **Organization:** *Not Specified*
Comment ID: 210089 **Organization Type:** State Government
Representative Quote: 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.

Response:

ROLAs on trails were considered but dismissed for all action alternatives. ROLAs 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 ID: 31316
CONCERN STATEMENT: No Dog Areas - The Meadow Loop Trail should be for hikers only due to proximity to wetland containing red-legged frog and garter snake.

Representative Quote(s): **Corr. ID:** 2295 **Organization:** *Not Specified*
Comment ID: 226683 **Organization Type:** Unaffiliated Individual
Representative Quote: would also support Plan adoption of Alternative A with Modification by also limiting use of the Meadow Loop Trail to hiking only. By providing two trails for hiking only, this would help reduce potential user conflicts while protecting the most sensitive habitats within the Sweeney Ridge Trail System. The Notch Trail is a narrow single track trail located within an identified sensitive Mission blue butterfly corridor. The Meadow Loop Trail is also a narrow single track trail located next to a sensitive fresh water wetland that likely supports California red-legged frog and potentially San Francisco garter snake.

Response: Dog walking activity would not be allowed on the Meadow Loop Trail because this trail is narrow and is located adjacent to a wetland area containing special status species. Please see chapter 2, Preferred Alternative for Sweeney Ridge/Cattle Hill for additional information on areas where no dog walking would be allowed.

Concern ID: 31317
CONCERN STATEMENT: Signage - Additional signage should be placed at trailheads explaining visitor user regulations and also any important habitat for wildlife located along the trails.

Representative Quote(s): **Corr. ID:** 2295 **Organization:** *Not Specified*
Comment ID: 226684 **Organization Type:** Unaffiliated Individual
Representative Quote: There is limited signage at most of the trail heads. For example, there is not much signage at the Mori Ridge Trail entrance and the Portola Discovery Site area (intersection of Sweeney Ridge Trail, Baquiano Trail, and Sneath Lane Trail). There should be additional signage that explains the important rules and regulations applicable to all users similar to the signage installed at the Notch Trail entrance within Skyline College and the Milagra Ridge Trail System entrance. This would significantly help in reducing potential user conflicts by educating trail users and reinforcing the regulations. Please explain why this wasn't considered in the Dog Management Plan for reducing user conflicts.

1) In order to protect the surrounding habitat and make sure trail users stay on the designated trails, there should be additional signage installed at the trail heads explaining w/illustrations the local habitat and wildlife. This signage should be similar to the signage installed at the Notch Trail entrance within Skyline College and the Milagra Ridge Trail System entrance. This would also help educate and reinforce GGNRA regulations. Please explain why this wasn't considered in the Dog Management Plan for reducing potential user conflicts within the Sweeney Ridge Trail System.

Response: Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

EJ2010 – ENVIRONMENTAL JUSTICE: AFFECTED ENVIRONMENT

Concern ID: 29478
CONCERN STATEMENT: Off-leash dogs present a threat to the elderly since they are easily knocked down. Commenters also feel that minority ethnic groups are disproportionately impacted by off-leash dogs since many minorities are afraid of dogs.

Representative Quote(s): **Corr. ID:** 1886 **Organization:** San Francisco State University
Comment ID: 200399 **Organization Type:** Unaffiliated Individual
Representative Quote: I do not even visit Fort Funston because I am aware that it has basically become a dog park. The GGNRA is home to many sensitive, endemic species that need to be protected from off-leash dogs. I also feel that off-leash dogs present a threat to the elderly, who are in danger of being knocked down by uncontrolled dogs. There is also evidence in a report by Dr. Nina Roberts to suggest that minority ethnic groups are disproportionately impacted by off-leash dogs as they are afraid of the dogs. I strongly urge you NOT to allow off-leash dogs in the GGNRA, accept perhaps in fenced-in designated "dog park" areas.

Corr. ID: 4631 **Organization:** *Not Specified*
Comment ID: 208667 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a person from the country of Myanmar and I have moved to the US to study at San Francisco State University as a scientist I study birds. I go to Chrissy Field, Tomales bay and Fort Cronkhite to look at the seabirds and other birds. There are dogs there that scare the birds by running after them. I am also nervous at these places because I am also afraid of dogs. We do not have many dogs in my country and they frighten me. I hope you will protect the birds.

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.

Concern ID: 29479
CONCERN STATEMENT: Commenters disagree with statements made in the plan from the 2007 San Francisco Study about how Latinos and Asians feel towards off-leash dogs. The plan should look at additional studies that focus on minorities that visit GGNRA.

Representative Quote(s): **Corr. ID:** 4533 **Organization:** *Not Specified*
Comment ID: 209693 **Organization Type:** Unaffiliated Individual
Representative Quote: The Plan/DEIS suggests that minorities don't visit the park or don't fully enjoy the park because of the presence of dogs, and that seniors, the handicapped and families with small children are threatened and intimidated by the presence of dogs. These suggestions are based on "studies" and "telephone surveys." The reality, however, is that

many of the people with dogs in the GGNRA represent and include minority groups, seniors, the handicapped and families with small children. In particular, I often see families with young children and their dog playing and picnicking at the East Beach area of Crissy Field. The preferred alternatives in many of the sites would have a more negative impact on many in those groups as the restrictions to access with dogs would make recreation that much more difficult or impossible. For instance, if a family with small children or a person with a walker has to walk to the Central Beach at Crissy Field before allowing their dog off-leash, many of those people will not be able to enjoy a beach experience with their dog because they will not have access.

Corr. ID: 4634 **Organization:** *Not Specified*
Comment ID: 208678 **Organization Type:** Unaffiliated Individual
Representative Quote: The claim that "environmental justice" requires severe restrictions on offleash dogs is not supported by the studies cited in the DEIS. A DEIS cited 2007 San Francisco State study claims that all Latinos and Asians surveyed said that dogs were a problem. However, the study was not about the "ethnic minority visitor use experience at the GGNRA" as claimed in the DEIS, but was actually intended to address ways to improve connecting people to the parks. In any event, the SF State study involved only 100 people who were largely unfamiliar with the GGNRA. My own observation is hat people of all ethnic and national origin backgrounds and their dogs enjoy offleash experiences at Crissy Field which the proposed changes will deny to them.

Corr. ID: 4684 **Organization:** *Not Specified*
Comment ID: 209958 **Organization Type:** Unaffiliated Individual
Representative Quote: If the Park User Experience section of the Draft Plan must include racial data, it must first collect that data, give a thorough analysis before making the generalization that minorities such as Asians and Latinos are afraid of dogs. I find this section of the Draft Plan deficient of data concerning park use by race.

Response:

The reference made to this study misrepresents the study's findings. An accurate description of the focus groups and what the report does and does not do has been updated and included in the draft plan/SEIS. Please see chapter 3, Visitor Use and Experience, Environmental Justice for additional information.

EJ4000 – ENVIRONMENTAL JUSTICE: IMPACT OF PROPOSAL AND ALTERNATIVES

Concern ID: 29480
CONCERN STATEMENT: Restricting off-leash dog walking limits equal access for the disabled, elderly, lower income, and ethnic minority communities. For example - the elderly and disabled will have a difficult time reaching the ROLA at Fort Funston under the preferred alternative. These minority groups prefer off-leash dog walking since it allows them to not have to exert physical strength which they may not have. In addition, these minority groups will be disadvantaged since some of them will have to travel further to reach off-leash areas. Some low income individuals may not have a car to drive to

alternative off-leash dog walking sites. Restricting dog walking activities will impact this type of recreation that minority communities enjoy.

Representative Quote(s): **Corr. ID:** 3941 **Organization:** *Not Specified*
Comment ID: 205932 **Organization Type:** Unaffiliated Individual
Representative Quote: It is unfair to punish all responsible dog owners with such severe measures for the problems created by a few dog owners. For example, we do not see similar severe measures being taken against bicyclists for the actions of a few.

Elderly people, special needs people and lower income people are more severely and unfairly punished by these current GGNRA proposals because they will have to travel so far to properly take care of their dogs. They may not be able to do so and may be forced to surrender their beloved companions.

Corr. ID: 4443 **Organization:** San Francisco Dog Owners Group
Comment ID: 264249 **Organization Type:** Non-Governmental
Representative Quote: The DEIS also does not address the impact of the severe restrictions on off-leash access proposed in the action alternatives (and especially the Preferred Alternative) on people with disabilities who currently walk with their dogs in the GGNRA.

Corr. ID: 4667 **Organization:** *Not Specified*
Comment ID: 264285 **Organization Type:** Unaffiliated Individual
Representative Quote: no comprehensive evaluation of the benefits or barriers related to dog recreation for disadvantaged groups nor developing programs to maximize recreational opportunities

Response: If funding becomes available, GGNRA would explore options that would allow for easier access for disabled and elderly visitors to ROLAs, such as beach mats. At Fort Funston, the park intends to improve ADA access on The Chip Trail, as funding becomes available. The impact analysis for minority populations has been revised. Please see chapter 4, Visitor Use and Experience, Environmental Justice for additional information.

FB1300 – FORT BAKER: DESIRE OTHER ALTERNATIVE

Concern ID: 29551
CONCERN STATEMENT: Commenters support alternative D because it is most protective of natural resources and visitor safety.

Representative Quote(s): **Corr. ID:** 1472 **Organization:** Marin Audubon
Comment ID: 200253 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternative D: Muir Beach, Fort Baker, Homestead Valley, Alta Trail and Orchard and Pacheco Fire Roads, Oakwood Valley, Marin Headlands Trail

Response: Alternative D was not selected as the preferred alternative for Fort Baker. The preferred alternative provides multiple visitor uses, although not off-leash dog walking, while still protecting the mission blue butterfly habitat

and visitor safety. Please see chapter 2, Preferred Alternative for Fort Baker for additional rationale for the selection of the preferred alternative.

FB1400 – FORT BAKER: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29553
CONCERN STATEMENT: ROLA - In order to provide more balance between user groups, a ROLA should be added to the mowed lawn on the Parade Ground.

Representative Quote(s): **Corr. ID:** 2038 **Organization:** *Not Specified*
Comment ID: 193277 **Organization Type:** Unaffiliated Individual
Representative Quote: It would appear that all alternatives were NOT considered. There are areas which would qualify as appropriate ROLA areas (ie no endangered species present) which have not been marked as ROLAs. For example, the mowed lawn on the Parade Ground of Fort Baker (which is entirely encircled by roadway. Why NOT add a ROLA here to preserve balance between dog-owners + non-dog owners in the GGNRA?

Response: The park has added a ROLA on the mowed lawn area of the parade ground in alternative E. The park will then analyze the impacts to all resources from the addition of the ROLA in the draft plan/SEIS to determine if a ROLA at this site would meet the project's purpose and need.

Concern ID: 29554
CONCERN STATEMENT: No Dog Area - Dog walking should be prohibited on Battery Yates Loop or Drown Fire Road in order to protect mission blue butterfly habitat.

Representative Quote(s): **Corr. ID:** 4215 **Organization:** San Francisco League of Conservation Voters
Comment ID: 208895 **Organization Type:** Conservation/Preservation
Representative Quote: Fort Baker - We generally support the Preferred Alternative, with the exception of Battery Yates Loop and Drown Fire Road. We believe the primary focus of this area should be protection of the mission blue butterfly habitat and that this area be off limits to recreation with dogs. .

Response: On-leash dog walking would occur along the Drown Fire Road and the Battery Yates Loop Road in the preferred alternative; however, the preferred alternative would provide protection of the mission blue butterfly habitat and other natural resources. Please see chapter 2, Preferred Alternative for Fort Baker for additional rationale.

FF1300 – FORT FUNSTON: DESIRE OTHER ALTERNATIVE

Concern ID: 29425
CONCERN STATEMENT: Commenters support alternative A because it allows the most off-leash dog walking of all the alternatives for dogs to exercise and/or it preserves the recreational uses at Fort Funston. There are few or no other comparable places to Fort Funston for owners to take their dogs off leash in the Bay Area. Commenters also cited support for alternative A because there are

access and/or leash issues for visitors, including the mobility-impaired, with the other alternatives proposed at Fort Funston.

Representative Quote(s): **Corr. ID:** 493 **Organization:** *Not Specified*
Comment ID: 181849 **Organization Type:** Unaffiliated Individual
Representative Quote: It is important to me that Fort Funston remains as it is. There is no other place where we can take our dog for a walk off leash. There are many other beautiful places in the Bay area for people to take walks and enjoy nature without dogs, but Fort Funston is one of the few places where we can bring our dogs and let them run free.

Corr. ID: 1205 **Organization:** *Not Specified*
Comment ID: 194839 **Organization Type:** Unaffiliated Individual
Representative Quote: Of your plans, if changed must be made, Map 16A is a compromise alternative that is viable and fair to all. It is also the only plan that will work well for seniors.

Please take seriously the detrimental effects the more severe restrictions will have on the health and welfare of seniors who have so long diligently and reverentially cared for Fort Funston.

Corr. ID: 1516 **Organization:** *Not Specified*
Comment ID: 190673 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a dog walker who frequents Fort Funston. I pick up twice as much poop as dogs I walk almost every time I am there as well as plastic bags & other trash from people.

Dogs are my life & I do not want them to lose the freedom of being off leash at the beach. However, as a 54 year old woman I can not physically handle taking 6 dogs down to the beach via on leash walking. They are anxious to run & I tho very healthy I can't handle their pulling & excitedness. I do have them trained to come via voice control & this should be sufficient for them & me. Well behaved dogs & responsible owners/dog walkers will be punished by these plans. I think the best alternative is to NOT change the usage areas, rather to enforce the rules regarding picking up poop & managing dog behavior.

Corr. ID: 1583 **Organization:** *Not Specified*
Comment ID: 190806 **Organization Type:** Unaffiliated Individual
Representative Quote: I support Alternative A (no change) for Fort Funston. Fort Funston is a very important park for me, my family and our dog. We enjoy walking on the paths and the beach. This is not a pristine park - it is an urban oasis. Fort Funston will never be Yosemite or Yellowstone. Walking at Fort Funston you can not forget you are in an urban area = you hear the traffic, the Pacific Gun Club and scores of folks walking together. Perhaps fencing the trail areas to keep dogs from the sensitive areas (suggestion).

Corr. ID: 1704 **Organization:** *Not Specified*
Comment ID: 191125 **Organization Type:** Unaffiliated Individual
Representative Quote: The everyday users of Fort Funston would like to

see it remain as is. It is a safe place for both people and dogs and receives maximum usage. The parking area is full on the weekends, 75 percent full or more on the weekdays. Changing the policy will not increase the amount of use. Educating the users of the park in ways to preserve both the current use and the natural surrounds would be great. For many elderly people Fort Funston is great because they can walk themselves and their dogs. Many elderly have a difficult time leash-walking. I think more of the regular Fort Funstoners would be willing to stay out of a few sensitive areas as long as the majority of the park remains off-leash. Pacifica will be impacted negatively by any change to Fort Funston.

Corr. ID: 1721 **Organization:** *Not Specified*
Comment ID: 191172 **Organization Type:** Unaffiliated Individual
Representative Quote: I have owned and walked dogs in both places. Specifically, I enjoy Crissy Field, Ft. Funston, and the Linda Mar/Sharp Park beaches with my dog and child.

I feel very strongly about maintaining off-leash areas in these locations. Open lands and our natural resources belong to all of us, and as a law-abiding tax-payer, I wish to protest further restrictions in our beautiful wild places.

Corr. ID: 3484 **Organization:** *Not Specified*
Comment ID: 203332 **Organization Type:** Unaffiliated Individual
Representative Quote: Please keep Fort Funston an off-leash play area for dogs. People who take their dogs there are super respectful of the habitat areas, always pick up dog waste, and only take dogs off leash that are social, friendly and under good voice control. It is one of the few areas in the Bay Area where dogs can really run, people can enjoy a scenic vista, and dogs can swim and play with lots of other friendly dogs. It would really be a shame to take one of the only outdoor places that is possible away from the dogs of the Bay Area and the people that love them.

Corr. ID: 4039 **Organization:** *Not Specified*
Comment ID: 207222 **Organization Type:** Unaffiliated Individual
Representative Quote: A primary issue for our family's dog care is my physical mobility. With the GGNRA's current dog policy, paved trails at both Fort Funston and Crissy Field enable me to participate actively in exercising our dogs. According to the Executive Summary, Alternatives B & D would completely bar me from being able to exercise my dogs at Crissy Field and Alternatives C & D would allow some, though very restricted (and likely very crowded) off-leash beach access. At Fort Funston, all options other than Alternative A would restrict off-leash dog activity from all wheelchair accessible trails. This, in effect, makes the area closed to wheelchair users who need to provide off-leash exercise for their dogs.

Corr. ID: 4540 **Organization:** *Not Specified*
Comment ID: 209780 **Organization Type:** Unaffiliated Individual
Representative Quote: The allowable off-leash area currently available at Fort Funston perfectly meets the recreational and social needs of people and

dogs alike. I feel that the "preferred alternative" choice that I learned of failed, seriously, to accurately analyze the need for residents of this urban area.

I trust that the GGNRA, in developing a general management plan, will take into consideration and respect the specific character and situation of the Fort Funston Area. I fully support Alternative A, the No Action alternative of the DEIS, as it relates to Fort Funston.

Response:

Alternative A was not selected for the preferred alternative; however, in order to provide more off-leash dog walking opportunities, the upland ROLA in the preferred alternative has been increased. The preferred alternative would still provide multiple visitor experiences and protection of natural and cultural resources. Please see chapter 2, Preferred Alternative for Fort Funston for further rationale.

Concern ID:

29429

**CONCERN
STATEMENT:**

Commenters support alternative E because it allows for a balance of off-leash, on-leash, and no-dog areas and/or still allows for protection of the environment.

Representative Quote(s):

Corr. ID: 1706

Organization: *Not Specified*

Comment ID: 191133 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Funston: Map 16-E would provide enough off-leash access and preserve natural settings too in my opinion.

Corr. ID: 1744

Organization: *Not Specified*

Comment ID: 191212 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Fuston

Plan 16E is the best of the group. I suggest making the wasteland between the parking lot and the water fountain also off-leash. Most of the time it is so blustery you need to cover your face to avoid getting sand in your face. That would be hard to do holding leashes.

The dogs often find this section the best areas for elimination and it is easiest to find and clean up (Mine like their privacy so they wouldn't do their business if they were on-leash).

I also think the park should continue to be posted as a high dog use area so people can choose to hike elsewhere if they wish to avoid dogs. The trails don't need them to be on-leash only.

Corr. ID: 3145

Organization: *Not Specified*

Comment ID: 202687 **Organization Type:** Unaffiliated Individual

Representative Quote: I am against the proposed on-leash areas for Fort Funston. This area is and has been a wonderful resource for walkers, dogs and their owners. I would support the alternative given on Map 16E. It's expansive land area for off-leash dogs could accommodate walkers and dogs of various abilities.

Response:

Alternative E was not selected for the preferred alternative; however, in order to provide more off-leash dog walking opportunities, the upland ROLA has been increased for the preferred alternative. The preferred alternative would provide multiple visitor experiences and protection of natural and cultural resources. Please see chapter 2, Preferred Alternative for Fort Funston for further rationale.

Concern ID:

29430

CONCERN STATEMENT:

There is support for alternatives B and D because they allow the least amount of off-leash and on-leash areas for dog walking at Fort Funston, and generally protect the natural resources at the site.

Representative Quote(s):

Corr. ID: 1544

Organization: *Not Specified*

Comment ID: 190729

Organization Type: Unaffiliated Individual

Representative Quote: Ft. Funston

No VC anywhere + esp. on trails - everyone (dogs, people, horses) controlled on trails. If what dog owners want is beach access, fine - but confined to smallest area possible.

Prefer 16D, Can live w/ only beach area on 16C

Corr. ID: 4354

Organization: *Not Specified*

Comment ID: 209528

Organization Type: Unaffiliated Individual

Representative Quote: FORT FUNSTON

The fort has a large number of people who have used it for dog walking and sociability for many years. It is severely eroded in large places. Watching dogs run and chase balls and sticks I see them move from denuded areas into areas which have been or could be rehabilitated for habitat, rather than given over to sand and ice-plant. Post and rail (coated wire) fencing such as is used on Milagra Ridge and Crissy Field is needed here, both to keep dogs out of vegetated or re-vegetating habitat and to give people and dogs a definite place to be or a clear path along which to move. Such fencing does not have to dominate the landscape.

I favor Alternative D which provides an upland area for the dogs and also a part of the beach as shown on the maps. There should be a connecting ROLA path between the upland and the beach, fenced as necessary to keep animals and people out of habitat.

Corr. ID: 4683

Organization: *Not Specified*

Comment ID: 210182

Organization Type: Unaffiliated Individual

Representative Quote: FORT FUNSTON

Alternatives A, C and E are all unacceptable for reasons mentioned above. Alternative C, the preferred alternative, is much too permissive and will only perpetuate the culture of destroying the resource. Remember this is a dune-based natural resource, so even seemingly benign uses such as the ROLA between the Chip Trial, Sunset Trail and the parking lot will continue to wear away the under') Ing compressed dunes and will continue the destruction of this unique place.

Alternatives B and D do nothing to really repair the damage to the Fort Funston resource.

Alternatives B and D offer some level of protection. We much prefer Alternative B.

Response:

Alternatives B and D were not selected as the preferred alternative because they would be restrictive of off-leash dog walking in an area with the highest use by dog walkers. The preferred alternative would provide multiple visitor uses including no-dog areas, on-leash dog walking areas, and ROLAs while still protecting important natural resources. Please see chapter 2, Preferred Alternative for Fort Funston for further rationale.

FF1400 – FORT FUNSTON: SUGGEST CHANGE IN ALTERNATIVE

Concern ID:

29433

**CONCERN
STATEMENT:**

Commenters have suggested time constraints (weekend vs. weekday, seasonal, hours of day) for off-leash dogs at ROLAs (including seasonal restrictions for bank swallows; moveable keep out signs for hang gliding areas) or at the site. Other commenters discussed having a fee for commercial dog walkers, which could provide money for maintenance and restoration projects at the site.

Representative Quote(s): **Corr. ID:** 279

Organization: *Not Specified*

Comment ID: 180932 **Organization Type:** Unaffiliated Individual

Representative Quote: A better alternative for Fort Funston would be: 1. ROLA on the beach, switching to on-leash during vulnerable periods for Bank Swallows.

Corr. ID: 598

Organization: *Not Specified*

Comment ID: 182156 **Organization Type:** Unaffiliated Individual

Representative Quote: My dog and I are frequent users of Crissy Field and Fort Funston. Although I am aware of some of the problems that have arisen due to off-leash dogs in these areas, I have personally never experienced them. The main reason, I believe, is that I go to these sites around sunrise, long before they are crowded and before professional dogwalkers arrive. My experience is that each place has a very regular and dedicated group of early arriverers. Because of the early hour and the low density of users, problems are extremely rare.

I urge those making this decision to consider the following:

2. The patterns of use at these parks vary during the day. Please allow continued use of existing off-leash areas at these parks during low use hours, e.g. from opening until 8:30 am and for an hour or two before closing time. The more stringent regulations should apply during higher-intensity use since there is much higher potential for conflict.

Corr. ID: 598

Organization: *Not Specified*

Comment ID: 222177 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Funston - 3. Make and enforce guidelines for

the number of dogs allowed per walker. It is reasonable that "professional" dog walkers, who are, after all, making commercial use of the parks for their own profit, should be held to a strict standard, perhaps including some kind of registration/licensing requirement, with the provision that violations could result in losing their license.

Corr. ID: 1137 **Organization:** *Not Specified*

Comment ID: 192473 **Organization Type:** Unaffiliated Individual

Representative Quote: In San Francisco, the cumulative effect of the current preferred alternatives would bring a drastic reduction in the percentage of overall off leash areas leading to over-crowding of remaining off leash areas and an increase in the risk of dog related issues and injuries. Please reconsider, especially at Baker Beach and Fort Funston.

Below are some other ideas for help with land preservation without the complete shut-down of areas:

- 1.) License or use fees for dog walkers/more than 3 dogs contributing funds for maintenance/preservation
- 2.) Use fee per dog for certain areas contributing funds for maintenance/preservation

Corr. ID: 1319 **Organization:** *Not Specified*

Comment ID: 222072 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Funston - The other option is to make no changes to off leash rules, but put a time limit on it. For example, only off leash from 6am-1pm.

Corr. ID: 1770 **Organization:** *Not Specified*

Comment ID: 191536 **Organization Type:** Unaffiliated Individual

Representative Quote: If dog owners have adequate areas for off-leash activities at Fort. Funston, they will be more respectful of the restricted areas. They will even self-police uninformed dog walkers who enter restricted areas, with the understanding that we can all lose our privileges if a few dogs are allowed in the habitat areas. In regard to hang-gliders, they are at the Fort only on certain days and times when the conditions are right. Moveable "Keep Out signs can restrict that area from dogs only when the hang-gliders are present.

Corr. ID: 4243 **Organization:** *Not Specified*

Comment ID: 209219 **Organization Type:** Unaffiliated Individual

Representative Quote: Lets take the Ft. Funston area in San Francisco as an example. As a dog owner even I will admit that that area IS NOT an area for any people with an aversion to dogs. So if I wanted to enjoy a picnic, walk, bicycle ride, horseback ride (?) etc., without canine interference, that could very well be an impossible undertaking there. A REASONABLE COMPROMISE might be to have alternating days/weeks/months (?) for dog owners/walkers and those who would enjoy the same area(s) dog free. For example, if I wanted to walk my dog leash free there tomorrow on the 18th, and I know that the day or week was off limits for dog owners/walkers, I would have to make other arrangements. I do not

recommend month long hiatuses, one week intervals would probably be more compassionate toward dog owners/walkers (Another thing to keep in mind: professional dog walkers use such areas as a source of income; to close such areas would force such people to lose income or perhaps livelihoods.) The alternating time frame idea, I believe, could work for ALL AREAS in question/dispute.

Response:

Time of day restrictions can be difficult to enforce and confusing to park visitors; however, this management concept will still remain an option for dog management in the future. Please see chapter 2, National Park Service Preferred Alternative for additional rationale for time of day restrictions. Special Use Permits would be available to both private and commercial dog walkers with more than 3 dogs, with a maximum number of 6 dogs; permit charges would not exceed costs, however GGNRA is prohibited by law from charging entrance fees that could apply to all other dog walkers. However in the future, the park could consider establishing parking fees and concession fees to provide a new source of funding to be used to improve Fort Funston for visitors. Please see chapter 2, Elements Common to Action Alternatives, Permits for More than Three Dogs - Commercial and Individual Dog Walkers for additional information.

Concern ID:
CONCERN
STATEMENT:

29434

Commenters made suggestions for areas with no dog walking or for dog walking on-leash. Some commenters suggested having no dogs in various areas, including north of the Coastal Trail, the beach access, and Sunset Trail, south of the parking lot, all beach areas, and hang gliding areas so that visitors can enjoy the area and for protection of natural resources. Suggestions for on-leash dog walking included the hang gliding area and requiring leashes on dogs when horseback riders are in the area for safety concerns, as well as on-leash areas on all trails to protect restored areas and sensitive resources, as well as along the beach between the access trail and sewer outlet.

Representative Quote(s): **Corr. ID:** 235

Organization: *Not Specified*

Comment ID: 180754 **Organization Type:** Unaffiliated Individual

Representative Quote: I have raised, trained and handled dogs all my life. I don't currently own a dog, but go to Ft. Funston on a daily basis to be around dogs and hike. Since I "don't have a dog in this fight", I believe I am objective and can provide some insight. As a canine enthusiast, I still respect the fact that not everybody wants to be around dogs. I also realize that very few owners (or dog walkers for that matter!) actually have voice control of their dogs. I think the limit of 6 dogs for walkers is appropriate.

Regarding the "Preferred proposal": It seems workable and reasonable. The only flaw I see is that the "no dog area" North of the access trail is often inaccessible at high tide, due to a outcrop of rock from the cliff. I don't think this is fair to people who don't want to be around roaming dogs. I would keep the "no dog area", but make the beach (to the South) between the access trail and the sewer outlet pipe an on leash area.

Corr. ID: 1319 **Organization:** *Not Specified*
Comment ID: 222071 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston - It should be required that if a dog owner see a horse that they must leash their dog, period.

Corr. ID: 1319 **Organization:** *Not Specified*
Comment ID: 222070 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston - For the hang gliding area (left of the parking lot) should be on leash until 1/3 way down the stairs when a glider is in the area. Have signs posted. This protects the hang gliders and makes it still creates an open area for the dogs.

Corr. ID: 1522 **Organization:** *Not Specified*
Comment ID: 190686 **Organization Type:** Unaffiliated Individual
Representative Quote: 1) Fort Funston beach should be no dogs. The shore birds have a difficult enough time and even dogs on-leash disturb them by barking and lunging at them.

Corr. ID: 2073 **Organization:** *Not Specified*
Comment ID: 193335 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston is a prime gem of a location in SF that should be able to be enjoyed by people who don't like/are afraid of dogs. The current plan has the prime beach front as off leash - reduce or move the off leash to different location.

Corr. ID: 3148 **Organization:** Habitat Restoration Team
Comment ID: 222081 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston - In all other parts of Fort Funston dogs should be on leash and on trails. Having worked with others for years to restore the bluffs to native conditions, dogs should not be allowed into the protected areas. Staff and volunteer efforts to fence off sensitive areas have been compromised to allow dogs access to planted areas. Keeping them on leash will ensure that the thousands of hours of volunteer efforts to restore the Park will not be wasted. Just because we're free doesn't mean our labor shouldn't be valued.

Corr. ID: 4016 **Organization:** San Francisco resident
Comment ID: 206842 **Organization Type:** Unaffiliated Individual
Representative Quote: I would like to recommend Fort Funston ALTERNATE B with the following modifications:

-At the intersection of the (Coast Trail, Beach Access and Sunset Trail), and heading north, limit this area to non-dog-walking activities for the protection of the Bank Swallow and for users that are not comfortable with dogs.

Corr. ID: 4215 **Organization:** San Francisco League of Conservation Voters
Comment ID: 208901 **Organization Type:** Conservation/Preservation
Representative Quote: Fort Funston - We appreciate that this is a challenging unit for the GGNRA, and find most of the Preferred Alternative

acceptable, and a big improvement over the status quo. However, as in other units we have named, this again is a place that will not allow an experience free of unwelcome interactions with dogs. We would propose that the Coastal Trail north of the beach access, or even north of the drinking fountain, be no-dog. We also propose that the seasonal beach closure be year-round. Both of these actions still allow two large ROLAs and ample access to both, but would also greatly increase the ability of bird watchers and other visitors to enjoy the wonderful natural resources of this important park unit without the interruption caused by the presence of dogs.

Response:

The preferred alternative provides a no-dog experience within both a beach and trail environment. The park would allow on-leash dog walking on trails south of the main parking lot, the Sunset Trail and, to protect the safety of the hang gliders, on the Sand Ladder Trail. Dog walkers would not be permitted off-trail when outside ROLAs, so dogs would not be allowed within the hang gliding launch or landing areas. Dogs would also not be allowed on the Horse Trail. Please see chapter 2, Preferred Alternative for Fort Funston for additional rationale.

Concern ID:
CONCERN
STATEMENT:

29436
Fencing - Commenters suggest using fences/barriers and possibly entrance gates to keep off-leash dogs in certain areas at Fort Funston. Fences should be used to easily distinguish areas where dog walking is or is not allowed. Suggested areas for fencing or natural barriers include the following: areas along the bluffs; damaged area near the main parking lot (fenced ROLA); and along trails.

Representative Quote(s):

Corr. ID: 1740 **Organization:** *Not Specified*
Comment ID: 191199 **Organization Type:** Unaffiliated Individual
Representative Quote: Please consider putting up better barriers & fences to protect the land and plants that you (GGNRA) do not want harmed. A lot, if not all, barriers at Funston are insufficient & ineffective. Most are posts (low posts) with wires. When it's windy, a lot of these barriers are covered completely. Dogs AND people can easily cross these barriers. Its not only dogs that cross these barriers into plants. Many times at Funston, there are people who walk onto the protected plants & they're not even with a dog.

If you want to preserve plants please consider more effective barriers that will prevent dogs & humans from crossing. Humans are at fault too. Not just dogs.

Also, please replace the fence on the west end of the park. This fence has been down for about 1-2 years now & is a real safety hazard to all dogs AND people.

Corr. ID: 1850 **Organization:** *Not Specified*
Comment ID: 222067 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston Comment: The DEIS should be changed to:

- provide more fenced in area for wildlife habitat, for equestrian trails and

for protection of dogs at edge of bluffs, while continuing to provide additional off leash play areas. The DEIS fails to support claim that fencing will impede wildlife and will affect view.

Corr. ID: 2905 **Organization:** *Not Specified*
Comment ID: 202643 **Organization Type:** Unaffiliated Individual
Representative Quote: Ft. Funston - I support the Preferred Alternative for Ft. Funston. To improve upon the Preferred Alternative, I suggest installing a fence, with access gates and adequate signage, along the border of the ROLA north of the main lot. A borderline fence will clearly delineate the boundary of the ROLA and will minimize compliance problems and visitor conflict.

Corr. ID: 3812 **Organization:** *Not Specified*
Comment ID: 208448 **Organization Type:** Unaffiliated Individual
Representative Quote: 2. I believe that the proposed alternative at Fort Funston will not work unless the park fences the trails to keep visitors and dogs on trail. My experience working at Fort Funston has shown that unless fences are present, dogs will roam wherever their owners allow. That said, I suggest making the trails very wide, say 15 or 20 feet, to allow plenty of room for visitors with and without dogs to enjoy the trails. This will prevent a "fenced in" feeling, while allowing the park to restore the dune habitat that used to dominate Fort Funston. I don't believe the park can enforce leash laws or area restrictions without fences, and believe that fencing has worked in the northern portion of the site, allowing habitat restoration while also allowing dog owners and non-dog owners to enjoy the site.

Corr. ID: 4358 **Organization:** *Not Specified*
Comment ID: 209506 **Organization Type:** Unaffiliated Individual
Representative Quote: We are also concerned about the preservation of the parks' natural resources, but more balanced and reasonable options exist besides restricting dog-walking access. It is not even clear at Ft. Funston where dogs are not allowed. Better signage and the creation of environmental barriers would be a solution that could protect wildlife and vegetation, yet allow dogs off leash and their guardians to use the park.

Corr. ID: 4670 **Organization:** Fort Funston Dog Walkers
Comment ID: 264304 **Organization Type:** Non-Governmental
Representative Quote: Recommendations specific to Fort Funston - Install signage (describing the danger), low fencing and/ or vegetative barriers along the cliffs where most of the dog / owner rescues occur.

Response:

The park will use fencing or natural barriers to separate the ROLA from the main parking lot and adjacent no dog areas. Please see chapter 2, Preferred Alternative for Fort Funston for additional information on fencing.

Concern ID:
CONCERN
STATEMENT:

29437
Commenters made several suggestions about ROLAs, particularly regarding the size and location of the ROLAs at Fort Funston. Suggestions for new ROLAs included the creation of a walking loop because on-leash walking on the steep beach access trail would be dangerous, creating a ROLA on the

area adjacent to the parking lot as the beach ROLA would be inaccessible at high tide, suggestions to increase the ROLA size, and moving the ROLA away from the cliffs. Commenters also suggested closing certain sections of Fort Funston in shifts (rotate ROLAs) as necessary to aid in natural resource preservation.

Representative Quote(s): **Corr. ID:** 235 **Organization:** *Not Specified*
Comment ID: 222158 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston - The beach from the pipe to the sand ladder trail could ROLA. This would provide a landmark (the pipe) to define the two areas. It would also allow dogs to access the "voice control" area from the North or South.

Corr. ID: 1319 **Organization:** *Not Specified*
Comment ID: 222069 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston - Another problem is that there are many times the tide is too high to be on the beach in the zone proposed for the off lease zone and therefore is not usable. Keep the areas right of the parking lot and parking lot off leash.

Corr. ID: 1466 **Organization:** *Not Specified*
Comment ID: 222085 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston - I am also in support of ROLAs being rotated so the land is not overused and if conflicts arise, an on-leash policy being implemented. That is safer for everyone. I am also in favor of fenced in dog run areas as an alternative but I feel that Alternate C is a much better direction to take.

Corr. ID: 1717 **Organization:** *Not Specified*
Comment ID: 222073 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston - If they must increase restrictions than they should at least create an area where people can get a good walk and the dog can get exercise. At the very least make the off leash area from the parking lot all the way to the beach access trail and also from the staircase to the bottom of the beach trail.

Anything less than this is destroying what is wonderful about Fort Funston.

Leave the following area off leash:
Entry loop from stairs to beach access trail, in loop including beach. Then enforce the rule!

Corr. ID: 1913 **Organization:** *Not Specified*
Comment ID: 192588 **Organization Type:** Unaffiliated Individual
Representative Quote: FoFu- Preferred alternative needs more ROLA area and clear division between ROLA and leashed or no dogs to provide more equitable division.

Corr. ID: 1916 **Organization:** *Not Specified*
Comment ID: 192596 **Organization Type:** Unaffiliated Individual
Representative Quote: FoFu- Please include a ROLA path to the beach in

the preferred alternative.

FoFu - Extend the Alt. E ROLA to the north, and include it in the Preferred Alternative. There is no reason why you can't just fence off an area for the snowy plovers while they are laying.

Corr. ID: 3745 **Organization:** *Not Specified*

Comment ID: 204606 **Organization Type:** Unaffiliated Individual

Representative Quote: The preferred alternative cannot be allowed to go forward. It is more than too restrictive, Parts of it are downright dangerous. Having the off-leash area at Funston be an area that borders the cliffs and the parking lot, given that the density in that area will be greatly increased shows a complete disregard for the safety of the pets that will be using that area. Leashing packs of dogs while descending to the beach is also a recipe for disaster.

Corr. ID: 4690 **Organization:** *Not Specified*

Comment ID: 210080 **Organization Type:** Federal Government

Representative Quote: 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.

Response:

In order to provide more off-leash dog walking opportunities, the ROLA has been enlarged in the preferred alternative and includes the beach access trail. The preferred alternative would provide multiple visitor experiences and protection of natural and cultural resources. Please see chapter 2, Preferred Alternative for Fort Funston for further rationale.

Concern ID:

**CONCERN
STATEMENT:**

29439

Commenters noted that signage and education would aid in compliance. Clear signage on the dog walking regulations, ROLAs, and no-dog areas should be available. This would improve compliance. Current signs for wildlife areas need to be replaced or repaired. Along with this, Commenters suggested implementing more education programs for visitors on regulations and important natural resources at the park in order to reduce dog walking in sensitive areas. Commenters also noted the need for better enforcement of compliance at Fort Funston, and the establishment of a system that would allow visitors to easily report non-compliant dog walkers.

Representative Quote(s): **Corr. ID:** 598 **Organization:** *Not Specified*

Comment ID: 222168 **Organization Type:** Unaffiliated Individual

Representative Quote: 1. Clearly posted guidelines help park users and enforcement personnel. When I first got a dog and began going to these

parks, I found it very confusing that there were no posted guidelines for dogs and owners.

Corr. ID: 2326 **Organization:** *Not Specified*
Comment ID: 201646 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston Specifically

Families + dogs + kids + education (and clear instructions on how to take care of nature) = the next generation of caretakers of GGNRA.

Use the existing community to help implement your goals of caretaking

By spending the budget on clear boundaries and education in the long run you will reach your goal of land and wildlife protection now and for generations to come at minimal expense. Use the existing community to implement these goals.

There are very few programs for adults, families and children to educate them regarding protecting the native flora and fauna, - so tell them.

Corr. ID: 2326 **Organization:** *Not Specified*
Comment ID: 223768 **Organization Type:** Unaffiliated Individual
Representative Quote: At Fort Funston there is a small amount of visible signage to explain the wildlife situation. There are a few old, broken, and sand covered fences to delineate protected wildlife boundaries. The lack of clarity has led to a disregard. However, I have seen this disregard extend to all people not just people with dogs. I don't think dogs are really the problem - it is people. I am convinced that most people don't intend to be malicious or malfeasant they just don't understand how their behaviors effect the big picture. They see acres of sandy open space with military remains and can't understand how someone thinks they are doing damage. So what if my dog and my kid dig in the sand?

Increase Signage and boundary delineations for protected areas

1. Explain what nature is vulnerable and needs our protection - help us be even prouder of our coast than we already are!
2. Expect - People behaviors and actions- specific guidelines ie: pack it in pack it out, keep out of certain areas
3. Expect - Canine behaviors and actions- specifics ie: pack it out - the poop, keep out of certain areas, no digging in certain spots
4. Expect - Other park users behaviors and actions with specific guidelines - bicycle, horse, hang gliding, picnickers, dune surfers, fisherman, joggers, remote flyers, etc
5. Community Service Projects so the youth can have education credits for helping snowy plover, native plant restoration or other wildlife.
6. Self Monitoring - each one teach one - self policing of expectations

Keep non critical areas open to off leash, then use boundaries, education and community to protect the rest.

Corr. ID: 2905 **Organization:** *Not Specified*
Comment ID: 222179 **Organization Type:** Unaffiliated Individual
Representative Quote: Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Additionally, I suggest aggressively restoring the coastal scrub habitat throughout Ft. Funston. Plant and animal species, as well as park visitors, have been displaced from Ft. Funston over time as dog play activities have increased. A proactive effort must be made to bring back the visitors who are interested in proper stewardship of this area of the park

Corr. ID: 3747 **Organization:** *Not Specified*
Comment ID: 222075 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston - 2. Post placards for an email address or website to report patrons who are damaging natural resources or endangering visitors of the GGNRA.

Corr. ID: 4077 **Organization:** *Not Specified*
Comment ID: 207796 **Organization Type:** Unaffiliated Individual
Representative Quote: I do feel that things can be done to help preserve the area, but the plan put forward goes way to far. I would suggest:

- Rangers should patrol the area to enforce the new rules

Response:

Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

Concern ID:
CONCERN
STATEMENT:

41479
Commenters noted accessibility issues including but not limited to: all the off-leash areas of the preferred alternative are on sand and hard to navigate for mobility-impaired persons (elderly, handicapped); the on-leash requirement for the Sand Ladder Trail and the steep steps is dangerous to navigate with a leashed dog; the beach ROLA is too hard to access because visitors must walk across/on sand.

Representative Quote(s): **Corr. ID:** 107 **Organization:** *Not Specified*
Comment ID: 181961 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston - requiring folks to leash their dogs on the sand ladder to Fort Funston is quite frankly dangerous. Clearly the writers have not walked up and down that ladder very often. It's very steep and frequently eroded - thus making it a slope. I believe that if dogs were leashed, you'd have quite a few more people taking spills head-first as their dogs eagerly pull them down. If the concern is to keep dogs from romping on the hills, then simply restrict the dogs to inside of the fence.

Corr. ID: 887 **Organization:** *Not Specified*
Comment ID: 190049 **Organization Type:** Unaffiliated Individual
Representative Quote: My main issue is that your map if taken at face value could be misconstrued as providing a generous amount of off leash area when in fact the area chosen is problematic in many ways. Primarily, the beach at Ft. Fun is very difficult to access. You either need to walk

down/up an extremely steep/sandy/logged path followed by challenging access up/down from the beach. Additionally, after certain bad storms access has been impossible and much garbage has been on the beach as a result of sewer issues and tides. Also, during certain times of the year especially in the summer there are a lot of dead creatures (crabs, birds, sailfin jellie fish, even sea lions) which pose public health issues due to disease and decay. The other beach access point is at least 1/2 mile from the parking lot with another steep (albeit shorter) hill to access. This is going to limit those with any physical issues be it age, cardiac related, musculoskeletal issues etc.

Corr. ID: 1185 **Organization:** *Not Specified*
Comment ID: 193563 **Organization Type:** Unaffiliated Individual
Representative Quote: In reviewing all of your proposed plans for Funston, "C" seeming to be that plan to which the GGNRA is leaning, there is an accessibility issue for handicapped individuals and individuals with mobility problems. Proposed Plan C's off lease area is all sand, which is not compact and is slopped on the east side making it impossible for access for handicapped individuals and individuals with mobility problems.

My third point is that making the area at the north water fountain an on leash area would only encourage dogs to be more aggressive when vying for a spot at the water dishes. Dogs are known to be much more defensive and aggressive, when on leash.

Corr. ID: 1543 **Organization:** *Not Specified*
Comment ID: 190726 **Organization Type:** Unaffiliated Individual
Representative Quote: Re: Fort Funston

Elderly and disabled people will have great difficulty reaching the beach section to allow their dogs to run off-leash. The most important area for them is the top section where the dogs can run around freely.

It is a discrimination against them to force them to walk all the way to the beach area to go off-leash.

Response:

The draft plan/SEIS addresses ADA compliance in more detail. GGNRA will continue to look into additional visitor experiences for visitors with disabilities. The preferred alternative was changed to include off-leash access to the beach, and hardening of trail surface in the upland ROLA for easier mobility. Please see chapter 2, Preferred Alternative for Fort Funston for additional rationale.

FM1300 – FORT MASON: DESIRE OTHER ALTERNATIVE

Concern ID: 29306
CONCERN STATEMENT: [Alternative A is preferred since dog walking conditions have been working well.](#)
Representative Quote(s): **Corr. ID:** 790 **Organization:** *Not Specified*
Comment ID: 186017 **Organization Type:** Unaffiliated Individual
Representative Quote: My comments address Upper and Lower Fort

Mason.

The current circumstance has been Heaven. That is, Alternative-A, dogs on leash at all times is the preferred choice. No dogs in the garden.

Response:

Alternative A was not selected as the preferred alternative. The preferred alternative would allow a ROLA to be established on the Laguna Green area. Please see chapter 2, Preferred Alternative for Upper and Lower Fort Mason for additional rationale.

Concern ID:

29310

CONCERN STATEMENT:

Alternative C is preferred. Commenters believe that, since this is not an environmentally sensitive area nor is it heavily used by visitors, ROLAs should be allowed.

Representative Quote(s):

Corr. ID: 193

Organization: *Not Specified*

Comment ID: 182305

Organization Type: Unaffiliated Individual

Representative Quote: I approve of increased restrictions, especially in wildlife sensitive or heavy use areas. near Fort Mason, I am in favor of Alternative C - ROLAs.

Corr. ID: 2224

Organization: *Not Specified*

Comment ID: 200830

Organization Type: Unaffiliated Individual

Representative Quote: I favorably endorse alternative 9C for Ft.Mason park.

Corr. ID: 2888

Organization: *Not Specified*

Comment ID: 202949

Organization Type: Unaffiliated Individual

Representative Quote: The rolling grassy field at Ft. Mason as well should be an area to be used for restricted off-leash dog use.

Response:

Alternative C was not selected as the preferred alternative due to the high use of the site. Currently, on-leash dog walking is allowed throughout the Fort Mason site as stated in the 1979 Pet Policy. The preferred alternative would allow off-leash dog walking within a ROLA on Laguna Green. Please see chapter 2, Preferred Alternative for Upper and Lower Fort Mason for additional rationale.

FM1400 – FORT MASON: SUGGEST CHANGE IN ALTERNATIVE

Concern ID:

29300

CONCERN STATEMENT:

Commenters feel that during the weekdays Fort Mason has low visitor usage so it would provide a great area to allow a dog to exercise off leash. Commenters stated that this area is not environmentally sensitive so dogs should be allowed to be off leash. Commenters made several suggestions about ROLAs, including having a ROLA on the Great Meadow since it is a developed lawn area, or having a ROLA on the southern section of the Great Circle, while all other areas should be for on-leash dog walking. One commenter suggested that the ROLA presented in alternative D should include a fence to protect Laguna Green. Commenters believe that not allowing off-leash dog walking should not be based on other users of the area such as tourists or bicyclists.

Representative Quote(s): **Corr. ID:** 417

Organization: *Not Specified*

Comment ID: 181586 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Mason (proposed Alternative B): The current proposal requires dogs to be leashed, in favor of tourists on rented bicycles. The Great Meadow is a popular area for members of the community to meet and let their dogs run. Therefore, in interest of the community, it should be an off-leash area (at least the southernmost part, away from the main service road). All other specify areas (Laguna Green, grass, service road, housing, etc...) on-leash only. It's illogical to give favor to cyclists, as legally they aren't supposed to be riding on pathways through the Great Meadow, anyway. This would provide a largely on-leash park (since it is multi-use and already very developed) with respect to the prime area currently used for off-leash dog walking. Cyclists should NOT get priority, as they're the ones currently violating the law and, being on legally defined vehicles, a bigger threat.

Corr. ID: 567

Organization: *Not Specified*

Comment ID: 182056 **Organization Type:** Unaffiliated Individual

Representative Quote: Northern San Francisco (Marina, Cow Hollow, Russian Hill) is noticeably an area heavily populated by dogs and but lacking off leash dog parks. One of the few places that has been traditionally used for off leash recreation for many years is Crissy Field. Crissy Field should certainly retain the status quo and continue to fulfill this needed purpose. Fort Mason should also legalize off leash dog walking. So called "environmentalists" have argued the environmental impact that this would have on this park; however, I find these arguments weak as this is clearly a manicured urban park.

Corr. ID: 1401

Organization: *Not Specified*

Comment ID: 195324 **Organization Type:** Unaffiliated Individual

Representative Quote: I do think that it's important to keep some of the more developed areas available for off-leash dogs, such as the Crissy Field lawn and Fort Mason's great lawn. Why not have these big lawns be available to dogs? I'd rather see dogs running there than through a pristine patch of coastal scrub in the Presidio. Lawns are huge wasters of water and fertilizer; if they can take some of the doggy need off of the beaches they will at least be serving some purpose.

Corr. ID: 4215

Organization: San Francisco League of Conservation Voters

Comment ID: 208896 **Organization Type:** Conservation/Preservation

Representative Quote: We find the proposed Preferred Alternative either desirable or acceptable in the following sites, assuming the incorporation of our general comments: Fort Mason, Baker Beach and Ocean Beach. We believe the ROLA described in Fort Mason Alternative D would be acceptable if an adequate means of physical separation of the Laguna Green area could be identified. We are very pleased to see substantial areas without dogs on both Baker Beach and Ocean Beach. This is good for wildlife, vegetation and people

Corr. ID: 4412 **Organization:** *Not Specified*
Comment ID: 207009 **Organization Type:** Unaffiliated Individual
Representative Quote: Ft. Mason

ELIMINATE LEASH REQUIREMENT IN THE GREAT CIRCLE

I have walked my dog on leash at Ft. Mason, and have no idea why dogs are required to be on leash in the great circle. At least during the weekdays, the area is practically unused, and would provide a great place to allow a dog to exercise off leash.

PROPOSED ROLA SHOULD BE SOUTH SECTION OF CIRCLE

I noticed that one of your proposals (although not the preferred proposal) would allow for a ROLA at a section of the park. I applaud that proposal, but would suggest that either, the entire circle be allowed for dog use, or that the section designated for the ROLA be the area of the great circle near the restrooms where the water fountains are located, as this area (in my experience) is less used than the section that leads between Ft. Mason and Aquatic Park.

Response:

The preferred alternative for Fort Mason would include a ROLA on Laguna Green. Either fencing or a vegetative barrier would be installed to separate the ROLA from the remaining on-leash dog walking areas and to prevent dogs from entering the adjacent street. Establishing a ROLA within the Great Meadow and adjacent paths would create safety hazards for multiple visitor uses. Please see chapter 2, Preferred Alternative for Upper and Lower Fort Mason for additional rationale.

Concern ID:

**CONCERN
STATEMENT:**

29301

Commenters feel that there should be no commercial dog walking, only one or two dogs per visitor, a compliance rate of 95 percent, and establishment of a simple and effective reporting system at Fort Mason.

Representative Quote(s):

Corr. ID: 2905 **Organization:** *Not Specified*
Comment ID: 202640 **Organization Type:** Unaffiliated Individual
Representative Quote: Ft. Mason - I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Corr. ID: 3608 **Organization:** Golden Gate Audubon
Comment ID: 203971 **Organization Type:** Unaffiliated Individual
Representative Quote: Site Specific Comments

Ft. Mason - I support the Preferred Alternative B with the following changes: limit of three dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Response:

The compliance-based management strategy has been removed from the draft plan/EIS and replaced with a monitoring-based management strategy,

based in part on comments received from the public. Please see chapter 2, monitoring-based management strategy for a description. Commercial and private dog walkers would be allowed to walk 3 dogs, and could apply for permits to walk more than 3 dogs, which would be allowed at Fort Mason. See Appendix F for permit terms and conditions.

Concern ID: 29304

CONCERN STATEMENT: While some commenters indicated that they desire having some areas of Fort Mason that are dog free, other commenters suggested on-leash dog walking at the Great Meadow and a much smaller area in Laguna Green for dog walking.

Representative Quote(s): **Corr. ID:** 1556 **Organization:** *Not Specified*
Comment ID: 190747 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Mason - Upper:

Dogs should be o-leash only at Great Meadow + a much smaller area in Laguna Green designated.
Preferred map 9-D.

Corr. ID: 4206 **Organization:** *Not Specified*
Comment ID: 208851 **Organization Type:** Unaffiliated Individual
Representative Quote: I think there should be at the least, sections of Fort Mason, East Beach, and Baker beach that are 100% NO DOG zones.

Response: On-leash dog walking would be allowed within the Great Meadow; however, a ROLA would be established within the Laguna Green area. Either fencing or a vegetative barrier would be installed to separate the ROLA from the remaining on-leash dog walking areas and to prevent dogs from entering the adjacent street. A no-dog experience would be available on the parade ground and the lawn around the Officer's Club. With the addition of the ROLA, it is expected that more visitors walking dogs would use the ROLA; therefore, a reduction in the number of dogs throughout the remaining areas of the site, including the Great Meadow, would likely occur. Please see chapter 2, Preferred Alternative for Upper and Lower Fort Mason for additional rationale.

Concern ID: 29308

CONCERN STATEMENT: Time of Day Restrictions - The draft plan/EIS should consider time of day, day of week, and season at Fort Mason. Commenters believe that this consideration would require less enforcement work for rangers, would benefit visitors who do not enjoy dogs, and benefit visitors who do enjoy off-leash dog walking.

Representative Quote(s): **Corr. ID:** 2170 **Organization:** *Not Specified*
Comment ID: 200562 **Organization Type:** Unaffiliated Individual
Representative Quote: I would propose a compromise. Fort Mason would have limited ROLA hours to allow dog owners to have use of the Great Meadow but also allow other people the opportunity to enjoy the field without dogs. Sat/Sun/Holidays would be on-leash only times. During the week there could be ROLA hours of approximately 3 - 6 or 7pm (depending

on time of year). If a warm, sunny day fell during the week and there were a significant number of people without dogs using the field, rangers could suspend ROLA for that day. This compromise would require less enforcement work for rangers, would allow non-dog people to take advantage of the park when weather permitted, and, would give dog owners the chance to let their dogs run at the Great Meadow at those times when few other people are using the meadow.

Corr. ID: 4170 **Organization:** *Not Specified*
Comment ID: 208736 **Organization Type:** Unaffiliated Individual
Representative Quote: The Preferred Alternate Plan for Crissy Field and Fort Mason fails to consider 1.) time of day, 2.) day of week, and 3.) season.

1. Time of Day. During morning and evening hours there are often more people walking their dog than people without a dog.
2. day of week. During weekdays all day, the quantity of people at Fort Mason and Crissy Field is minimal. Dog restrictions on use during weekdays is not warranted.
3. Season. During the cold, gray, raining, foggy months of the year the quantity of people at Fort Mason and Crissy Field is minimal. Dog restrictions during the wet season is not warranted.

At Crissy Field or Fort Mason, if restrictions are to be placed on off-leash dog walking, these restriction should only be put in place during the days and time when overcrowding warrants it.

In my opinion, the only times Crissy Field or Fort Mason warrant any off-leash dog restrictions, would be during the weekends, and only between 11 - 4 p.m., and only in specific verified overcrowded locations (the air-strip at Crissy is never over crowded)

Response: Time of day restrictions can be difficult to enforce; however, this management concept will still remain an option for dog management in the future as the park gathers additional visitor use data at each site. Please see chapter 2, National Park Service Preferred Alternative for additional information on time of day restrictions.

FP1300 – FORT POINT: DESIRE OTHER ALTERNATIVE

Concern ID: 29485
CONCERN STATEMENT: No Dog Area - It is difficult to have a no-dog experience at Fort Point, and the terrain of the trails may lead to unwanted interactions with dogs. Alternative D should be the preferred alternative at Fort Point.

Representative Quote(s): **Corr. ID:** 4215 **Organization:** San Francisco League of Conservation Voters
Comment ID: 208898 **Organization Type:** Conservation/Preservation
Representative Quote: Fort Point - This is one of several sites in San

Francisco, as noted in the general comments, where we believe there is a decided lack of opportunity to have a "no dog" experience or to even avoid unwelcome approaches by dogs, given the narrowness of many of the trails. We support the Alternative D treatment ideally, or at least a reduction in the number of trails where dogs are permitted than shown in the preferred.

Response: Alternative D was not selected as the preferred alternative for Fort Point. No dog experiences would continue to be available on the pier and within the fort itself, and on the Batteries to Bluffs and Battery Crosby Trails within the adjacent Baker Beach and Bluffs to the Golden Gate site. Please see chapter 2, Preferred Alternative for Fort Point for additional rationale for the selection of alternative B as the preferred alternative.

FP1400 – FORT POINT: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29486
CONCERN STATEMENT: ROLAs - There should be more off-leash areas for dogs to run, particularly on the beach and on Fort Point trails.

Representative Quote(s): **Corr. ID:** 3754 **Organization:** *Not Specified*
Comment ID: 334511 **Organization Type:** Unaffiliated Individual
Representative Quote: Allow urbanized areas such as Ft Mason, Chrissy Field, and Fort Point as leash-free dog runs.

Response: ROLAs would not be established on any trails throughout the park. Please see chapter 2, National Park Service Preferred Alternative for additional rationale regarding trails and ROLAs. A discussion of the rationale for dismissing ROLAs on trails can be found within the Alternative Elements Eliminated from Further Consideration section of chapter 2.

Concern ID: 29487
CONCERN STATEMENT: Commenters desired the preferred alternative, but only with the exclusion of commercial dog walking, a limit of one dog per visitor, the establishment of an easy system to report violations, and a requirement that compliance with the rules be at 95% or higher.

Representative Quote(s): **Corr. ID:** 4410 **Organization:** *Not Specified*
Comment ID: 206950 **Organization Type:** Unaffiliated Individual
Representative Quote: Ft. Point 'We support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Corr. ID: 4584 **Organization:** *Not Specified*
Comment ID: 210029 **Organization Type:** Unaffiliated Individual
Representative Quote: Ft. Point 'I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Response: Permits for commercial and individual dog walkers to walk more than 3 dogs would not be issued for the Fort Point site. However, all dog walkers, including commercial dog walkers, with 3 or fewer dogs could visit Fort Point. The compliance-based management strategy has been removed from the draft plan/EIS and replaced with a monitoring-based management strategy, based in part on comments received from the public. Please see chapter 2, monitoring-based management strategy for a description.

FT1300 – FORT MILEY: DESIRE OTHER ALTERNATIVE

Concern ID: 29291
CONCERN STATEMENT: Commenter supports alternative B and D (no dogs) and signage should be made available.

Representative Quote(s): **Corr. ID:** 71 **Organization:** none
Comment ID: 181826 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly believe that certain designated areas in GGNRA should exclude pets such as Fort Miley and huge swats of Ocean Beach. "No Pets" signs should be made visible and available for everyone to see including nighttime.

Corr. ID: 4354 **Organization:** *Not Specified*
Comment ID: 305616 **Organization Type:** Unaffiliated Individual
Representative Quote: I favor Alternative D for this area. It has steep topography with narrow trail corridors in most places. It is appropriate to have dogs on leash on the Coastal Trail so that all visitors may have a good experience. The people who use the widest portion of this trail between Pt. Lobos Avenue and the end of the improved area are often older, disabled, or appear to be visitors from other countries.

Response: Alternative D was not selected as the preferred alternative. The preferred alternative would provide a mix of visitor uses and experiences at Fort Miley. Please see chapter 2, Preferred Alternative for Fort Miley for additional rationale. In addition, please see chapter 2, Elements Common to Action Alternatives for additional information on outreach, education, and signage.

FT1400 – FORT MILEY: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29292
CONCERN STATEMENT: ROLA for Ft Miley and Lands End - A ROLA should be located along the Coastal Trail, Legion of Honor, El Camino del Mar Trail up to the steps, and between the golf course fence and bunkers.

Representative Quote(s): **Corr. ID:** 2023 **Organization:** *Not Specified*
Comment ID: 193237 **Organization Type:** Unaffiliated Individual
Representative Quote: -The coastal trail adjacent to Ft. Miley + the Legion of Honor needs to be a regulated offleash area.....

Corr. ID: 4354 **Organization:** *Not Specified*
Comment ID: 219011 **Organization Type:** Unaffiliated Individual
Representative Quote: The El Camino del Mar Trail up to the steps has little space for dogs to run off on either side owing to density of habitat and steep topography. It seems appropriate for a regulated off-leash area (ROLA).

Response: ROLAs would not be established on trails at Fort Miley or Lands End due to visitor safety hazards and conflicting uses. Please see chapter 2, Preferred Alternative for Lands End for additional rationale, including Elements Considered but Dismissed regarding establishing ROLAs on trails.

Concern ID: 29293
CONCERN On-Leash for Ft. Miley and Lands End - All the trails near the picnic tables and parking lots should be on-leash. Dogs should be on-leash along the Coastal Trail because it is steep and narrow. Trails missing from the maps from the golf course fence to the picnic tables and the El Camino del Mar Trail to the parking lot behind the Legion of Honor should also be on leash due to natural resources habitat.
STATEMENT:

Representative Quote(s): **Corr. ID:** 4354 **Organization:** *Not Specified*
Comment ID: 209526 **Organization Type:** Unaffiliated Individual
Representative Quote: LANDS END/FORT MILEY

Oddly, some trails are not shown on the maps, including one that connects the golf course fence line trail with the E. Ft. Miley picnic tables and one that continues the El Camino del Mar Trail past the steps to the parking lot behind the Legion of Honor. These areas have many opportunities for dogs to go off-trail into habitat areas. They should be on-leash areas. It should also be noted that the end of the fence line trail does not connect directly with the Legion of Honor parking lot and there is probably a 50' elevation difference between them. Walkers who try to connect in this area will be on San Francisco RPD land some of the time. Dogs should be on leash in all of these areas because of cars and museum visitors.

Response: On-leash dog walking would be allowed on the Coastal Trail and El Camino del Mar Trail, which does extend to the parking lot behind the Legion of Honor. On-leash dog walking would be allowed on the trail corridor between the golf course fence and the maintenance bunkers in East Fort Miley. No dogs would be allowed within West Fort Miley. Please see chapter 2, Preferred Alternative for Fort Miley for additional rationale.

GA1000 – IMPACT ANALYSIS: GENERAL COMMENT

Concern ID: 31873
CONCERN Several impacts levels and other objectives require further definition and
STATEMENT: explanation to make them more measurable or clear.

Representative Quote(s): **Corr. ID:** 4686 **Organization:** The Marin Humane Society
Comment ID: 210147 **Organization Type:** Non-Governmental
Representative Quote: "Visitor Experience and Safety" ' The draft plan

should clearly define what a "conflict" relating to dog use refers to.

"Law Enforcement/Compliance with Dog rules, and Park Operations"- The draft plan objective should further define what "maximizing dog walking compliance" refers to. This goal does not appear to be measurable and doesn't provide a process to determine enforcement success. A possible solution would be to clarify what the parameters will be to encourage high compliance or to incorporate envisioned compliance rates as an objective. Improved Park operations and use of staff resources managing dog walking seem to be different parameters. The draft plan should be very clear about what the enforcement goals are and assume that enforcement and staff resources are a part of daily park operations.

"Park Operations"- The draft plan should clearly state what and how the monitoring will be done by the Park. We would like to see this area further defined by clear objectives. The reference to monitoring to be used in future decision making based on estimated outcomes seems harsh and one-sided. This objective should be clearer. The draft plan should also address how it will evaluate commercial dog-walking and what that enforcement policy proposal will be.

"Natural Resources"- The draft plan should further define the objective of "protecting native wildlife and their habitat from detrimental effects of dog use..." Further, referring to detrimental effects of dog use doesn't adequately address what those issues include.

"Cultural Resources"- The draft plan should further define the meaning of "detrimental effects of dog use."

"Education" ' The draft plan should further define how to "build community support for the plan to maximize management of dog walking use."

Response:

The objectives described in chapter 1 are further discussed in other sections of the draft plan/SEIS. The monitoring-based management strategy discussion found in the Elements Common to Action Alternatives section of chapter 2 outlines the expected parameters for enforcement and compliance before changes are made to dog walking restrictions at sites in GGNRA. This section provides information on a monitoring timeline, and triggers and management responses. Outreach and education and commercial dog walking are also discussed in this section of chapter 2, and the permit conditions for commercial dog walking restrictions are provided in Appendix F. The objectives for natural and cultural resources and visitor use and experience are further discussed in these sections of chapter 4. chapter 4 has also been revised to include additional rationale and discussion of impacts. Please see chapter 4.

GA2000 – IMPACT ANALYSIS: USE TRENDS AND ASSUMPTIONS

Concern ID:

30514

**CONCERN
STATEMENT:**

Commenters have stated that the reasons for restricting/limiting/banning dogs at GGNRA are not realistic (such as dog attacks, dog walkers not

picking up dog waste). The draft plan/EIS did not take into account the fact that some GGNRA sites are under-utilized (Fort Funston, Crissy Field) or utilized almost solely by dog walkers or mostly paved sites. Commenters also disagree with the park's assumption of site usage (day vs. evening). Commenters also did not agree with park assumptions that visitors are not reporting dog incidents, elderly and minorities are scared of dogs, and visitors without dogs do not enjoy dogs. Commenters do not agree that allowing dogs at GGNRA makes more work for park employees.

Representative Quote(s): **Corr. ID:** 334 **Organization:** *Not Specified*
Comment ID: 181101 **Organization Type:** Unaffiliated Individual
Representative Quote: I am very aware of the need to preserve nesting space for the Snowy Plover. I am a conservationist and work at The California Academy of Science. My dog and I have respected the nesting area near the pier and never go there off leash. Dogs and their owners need space to run and enjoy the coastline. Many of the reasons given for imposing leash laws, such as dog attacks to beachgoers and dog walkers not being responsible for picking up, are not realistic and do not reflect the what goes on at Chrissy Field each day. San Francisco is known as a city that welcomes 'Life' in many ways and having the space to let a dog run free should not be something one needs to forfeit when living here.

Response: The chapter 4 impact analysis has been revised to include additional data including visitation patterns and park law enforcement data that supports the need for the new dog management regulation. Public comments were also included in the impact analysis revision. Please see chapter 4, Visitor Use and Experience, Health and Safety, and Park Operations for more details.

Concern ID: 41910
CONCERN STATEMENT: The methods used by NPS to measure visitors to the park and visitor satisfaction are flawed, and underestimate visitation by those with dogs. Baseline visitation must be established.

Representative Quote(s): **Corr. ID:** 2295 **Organization:** *Not Specified*
Comment ID: 264220 **Organization Type:** Unaffiliated Individual
Representative Quote: Making off-leash dog walking assumptions based on two years worth of incomplete data does not follow appropriate statistical methodology. Please explain.

Corr. ID: 2295 **Organization:** *Not Specified*
Comment ID: 264218 **Organization Type:** Unaffiliated Individual
Representative Quote: it has been my experience (using the trail system approximately 4 days a week for at least 3 years) that the percentage of visitors walking dogs out of the total visitors (hikers, dog walkers, horseback riders, mountain bikers, etc.) is Moderate (10-30 percent) to High (> 30 percent).

Corr. ID: 4640 **Organization:** *Not Specified*
Comment ID: 227745 **Organization Type:** Unaffiliated Individual
Representative Quote: o For many of the sites, the GGNRA is not monitoring visitation on any level to determine whether the recreation value is being maintained , improved or degraded; and the park service is not showing how their management decisions for each site impact the recreation value for the current and future generations
o Using the 2002 population survey and self-reported visitation plus the visitation counting methodology that ignores many entry points, the GGNRA is significantly understating current and yearly visitation and thus is not is not accurately reflecting the impact of management decisions on maintaining the recreation values for current and future generations
o Not that visitation records baselines need to be established to determine whether how dog management plans impact overall park usage and site specific usage. For example, if a "no dog" area experiences a significant increase in visitorship due to the new policy and the area is overcrowded and yet other "voice-control" areas are underutilized or vice versa then the Park Service should re-evaluate the trail distribution in an attempt to maximize the number of people enjoying the parks and getting daily exercise

Response: The park conducted an assessment of visitor activities at six sites within the park including Muir Beach, Rodeo Beach, Crissy Field, Baker Beach, Ocean Beach, and Fort Funston. Please see chapter 3, Visitor Use and Experience for details on the study.

GA3000 – IMPACT ANALYSIS: GENERAL METHODOLOGY FOR ESTABLISHING IMPACTS/EFFECTS

Concern ID: 30091
CONCERN STATEMENT: Commenters did not agree with the impacts analysis because they did not feel the material used in analysis were adequate. Some commenters believed that there was not enough scientific evidence to support restricting or banning dogs at GGNRA sites, and the plan is biased against dogs or there are too many cases of "could," "may," "might" in the impacts analysis (speculation), thus providing little evidence of actual impacts from dogs documented at the sites. Other commenters felt the reports used in the impacts analysis were not acceptable, applicable, or based in facts and data and questioned the use of studies that were not peer reviewed. Commenters also had concerns about the lack of monitoring/sampling/survey/usage statistics and site specific data, and suggested that such data be collected. Commenters also suggested that other studies need to be included in the analysis that show lower dog impacts, that important studies were not included in the analysis (GGNRA Site Stewardship use patterns survey, Nola Chow study, Forrest Cassidy/St. Clair/Warren study of snowy plover), or that some studies were not emphasized enough (Lafferty studies).

Representative Quote(s): **Corr. ID:** 129 **Organization:** Ocean Beach Dog
Comment ID: 182225 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to object to the proposed 2011 Dog

Management Plan for the GGNRA. In my view, the GGNRA has not gathered enough evidence of any sort to justify banning/restricting dogs from the GGNRA lands. Your science advanced is weak, and few surveys indicate that the majority of park users see any need for change.

Corr. ID: 624

Organization: *Not Specified*

Comment ID: 182744 **Organization Type:** Unaffiliated Individual

Representative Quote: After reading about the proposed plan, I developed many concerns about the way in which the document was written and the information on which its conclusions are based as well as the potential ramifications of its implementation. Specifically, the document's suggestions for alternative locations for off-leash dog-walking suggests the authors did not fully research alternative locations as some suggested locations are currently not designated off-leash areas. Further, the cited scientific research does not consider numerous additional studies that reached dramatically different conclusions about the impact of off-leash dogs on the environment.

Corr. ID: 936

Organization: *Not Specified*

Comment ID: 191419 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe that there is no factual basis for the argument that birds and other wild animals need to be protected from off-leash dogs. There seems to be no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife. Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impact.

Corr. ID: 1007

Organization: Odie's Mom

Comment ID: 191741 **Organization Type:** Unaffiliated Individual

Representative Quote: It also strikes me as odd that this is the fight the GGNRA wants to take up when there is no research to support the suggestion there has been ecological impact over the past 30 years of the use of the lands for dog walking.

Corr. ID: 1512

Organization: *Not Specified*

Comment ID: 191449 **Organization Type:** Unaffiliated Individual

Representative Quote: Snowy Plovers: Your own research (Forrest Cassidy St Clair and Warren all demonstrate that dogs do not actually impact the diversity, abundance and feeding behavior of the birds. The Hatch report observed 5692 dogs and only 19 chased plovers. Your own studies prove that parents with toddlers, surfers and other park users disturbed the plovers far more than dogs, yet I do not see anything in the DEIS that is further restricting their access. Why are dogs being singled out?

Corr. ID: 1981

Organization: *Not Specified*

Comment ID: 193157 **Organization Type:** Unaffiliated Individual

Representative Quote: Why are the studies regarding dog behavior & impact in other areas of the country being used as a basis for this proposal?

Who has reviewed the validity & credibility of the research cited in this study. Is it really applicable to this urban recreation area?

Corr. ID: 3068

Organization: *Not Specified*

Comment ID: 203065 **Organization Type:** Unaffiliated Individual

Representative Quote: Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover

Corr. ID: 3737

Organization: SF Dog Owners Group

Comment ID: 204240 **Organization Type:** Unaffiliated Individual

Representative Quote: I want a dog management plan based on real science, not pre-determined biased obscure observations with guessed at causes and outcomes. The DEIS fails to document actual impacts on resources at each site. DEIS assumes that if an impact "could" occur, it does occur at each site, even though there is little evidence of actual impacts documented at each site. If the DEIS cannot document actual impacts, then they cannot restrict access.

Corr. ID: 3737

Organization: SF Dog Owners Group

Comment ID: 204252 **Organization Type:** Unaffiliated Individual

Representative Quote: Undocumented Assumptions - The DEIS is full of assumptions about impacts - things that "might" or "could" happen - but there is no evidence of actual observed impacts. Cannot base management plan on hypotheticals. The GGNRA has had years to observe and document actual observed impacts. The fact the GGNRA did not include them in the DEIS indicates they don't exist. I have never seen dogs causing major problems, not attacking people or bothering bank swallows or snowy plovers at Fort Funston.

Corr. ID: 3789

Organization: *Not Specified*

Comment ID: 205542 **Organization Type:** Unaffiliated Individual

Representative Quote: I read much of the Dog Management Plan Draft EIS and, beyond my disagreement with the proposals provided in the document, I was incredibly disappointed by the quality of the document. Generally speaking, I had four major concerns:

1. There was a woeful lack of substantiation (scientific evidence or other documentation) to many claims made in the document. The document needs to be carefully reviewed and revised to ensure all statements are backed up by adequate references, or else that the statements in the document are revised.

Corr. ID: 4013 **Organization:** *Not Specified*
Comment ID: 206797 **Organization Type:** Unaffiliated Individual
Representative Quote: A second example citing data from a study that intentionally manipulates readers toward a misleading & biased conclusion can be found on page 227. The cited study (USGS 2008, 12) refers to a USGS survey measuring baseline pesticides concentrations at 10 creek sites - some of them located within the GGNRA. The data collected from this single study was no doubt an important first step "provide baseline information to enable evaluation of the need for future monitoring". But there is no data or method in this report to connect the low levels of Fipronil observed to any activity of dogs or dog owners in the area. So it begs the question, why is it in the DDMP?

Corr. ID: 4013 **Organization:** *Not Specified*
Comment ID: 206796 **Organization Type:** Unaffiliated Individual
Representative Quote: In fact, several of the cited works don't accurately describe the data & the areas of study in the context of a dog or general EIS within the GGNRA. One of many examples can be found in pg.225 of the DDMP regarding " Alterations of Park Soils". The citation -Joslin and Youmans 1999, 9.3- is taken from a review from Montana Chapter of the Wilderness Society. Naturally, the review focuses on the subject of land policy more accurately described as Montana wilderness. But more importantly the citation actually does not include any actual data - just a page & chapter in a review upon which the authors (Joslin/Youmans) cite other works. Even worse, the work was not published in a peer-reviewed journal.

Corr. ID: 4064 **Organization:** *Not Specified*
Comment ID: 207624 **Organization Type:** Unaffiliated Individual
Representative Quote: The DEIS provides no site-specific studies or evidence to support its strongly stated conclusion that allowing dogs access to limited areas on the GGNRA results in a negative impact on those areas.

The studies that are referenced in the document are often decades old and are based on research done in places as removed from the GGNRA as Virginia or Colorado. Additionally, these studies present contradictory conclusions about the severity of impacts due to dogs. The final conclusions of the DEIS claim studies prove that dogs have a significant negative impact of the environment, but the Boulder, CO study referenced in the document demonstrates that off-leash dogs did not travel far off-trail and rarely disturbed other people, wildlife, vegetation, or bodies of water. Another study states that dogs traveling on a trail with screening vegetation are unlikely to even encounter, let alone disturb, wildlife. Water quality sampling in the GGNRA at some sites that are currently accessible to dogs has shown that "the quality of water bodies throughout the park is generally acceptable for sustaining aquatic life." The DEIS cites the Crissy Field tidal marsh as a particularly healthy body of water, even though Crissy Field is a widely used off-leash dog recreation area. These conflicting data should put the conclusions in the DEIS about dog impacts into doubt, but instead the document clearly treats them as indisputable fact.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 200894 **Organization Type:** Non-Governmental
Representative Quote: The NPS needs to ensure the professional integrity, including scientific integrity, of the analysis and findings contained within its Draft Plan/DEIS. Detailed recommendations on how to revise the enforcement data in the Draft Plan/DEIS, and the ensuing impacts and alternatives analysis, are listed in Appendix B.

Corr. ID: 4591 **Organization:** *Not Specified*
Comment ID: 264265 **Organization Type:** Unaffiliated Individual
Representative Quote: There is little site-specific documentation of harm caused specifically by dogs. And there is no documentation or quantification of harm caused by all other park visitors. So, dog-caused problems cannot be evaluated in context.

Corr. ID: 4668 **Organization:** *Not Specified*
Comment ID: 264291 **Organization Type:** Unaffiliated Individual
Representative Quote: This section refers to the 2002 Social Research Laboratory survey results that 49% of respondents reported that off-leash dogs had no impact on their experience. The survey results actually are that 49% of respondents who had seen off-leash dogs believed that off-leash dogs had no impact on their experience. This section incorrectly assumes that this results means that these 49% of respondents represent a user group that as "no preference" regarding the presence of off-leash dogs in GGNRA

Response:

Additional data was included to refine the conclusions in the draft plan/SEIS and reduce uncertainty regarding the level of impact on the human environment; however, all NEPA analysis - no matter the amount of supporting data - is based on a prediction of potential future conditions and, as such, always contains elements of uncertainty. In lieu of site-specific data, 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. Additional data including visitation patterns and park law enforcement data was also incorporated. 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.

Commenters suggest that NPS must allow an activity to occur unless and until it can be proven to have impacts. However, NPS Management Policies, which apply to all units within the NPS, state 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 provided 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).

A new form of park use may be allowed within a park only after a determination has been made that, in the professional judgment of the superintendent, it will not result in unacceptable impacts. Moreover, park superintendents must continually monitor all park uses to prevent unanticipated and unacceptable impacts. If unanticipated and unacceptable impacts emerge, the superintendent must engage in a thoughtful, deliberate process to further manage or constrain the use, or discontinue it. When practicable, restrictions will be based on the results of study or research. (NPS Management Policies §§ 1.5, 8.2).

Commenters' suggestion that NPS managers provide an unassailable level of scientific evidence regarding the presence or absence of impacts would both prevent the consideration of new uses and the reasonable regulation of current uses. NPS Management Policies make clear that determinations on use should err on the side of conservation, and may be based on best professional judgment, and when practicable, on the results of study or research. In this way, NPS is able to make informed decisions regarding park uses that meet the NPS mandate to "conserve the scenery and the natural and historic objects therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." (16 USC 1).

Concern ID:

**CONCERN
STATEMENT:**

30096

Commenters state that that baseline for comparison in the draft plan/EIS should be an environment in which the impact of dogs is added to the impact of humans; or commenters do not agree with the baseline for comparison presented in the draft plan/EIS.

Representative Quote(s): **Corr. ID:** 1562

Organization: *Not Specified*

Comment ID: 190764 **Organization Type:** Unaffiliated Individual

Representative Quote: The current regulations are not enforced. In areas like Ft. Funston and its trails it would be beneficial to publish and post the regulations so they can be enforced prior to modifying the existing usage situation. Given the driver for the issues is heavily dependent on potential interactions between people and offleash dogs - you do not have a valid baseline on the issues until enforcement is in place. As a result making a change is premature.

Corr. ID: 4010

Organization: *Not Specified*

Comment ID: 206767 **Organization Type:** Unaffiliated Individual

Representative Quote: All human activities (and all activities by other species) impact other components of the ecosystem. This does not mean that we will, as a society, treat all disturbance as acceptable. However, it provides a more honest reference point for discourse about acceptability. I request that the NPS document the historic range of variability, using pre-white settlement as a reference point, for the species discussed in the DEIS. In addition, I request that the NPS document the effect on those species of

humans other than those recreating with dogs. This includes the effect of NPS actions. This provides an important context for discussions of the impact of people recreating with dogs

Corr. ID: 4038 **Organization:** *Not Specified*
Comment ID: 207208 **Organization Type:** Unaffiliated Individual
Representative Quote: The GGNRA should modify its compliance-based approach to create a baseline of current conditions and then measure impacts against compliance. Based on my considerable experience at Crissy Field, I am highly confident the GGNRA would learn that the so-called bases or justifications for the alternatives -- at least at Crissy Field -- have no validity. Indeed, many of the purported justifications for the restrictions are couched in "could's" rather than what has actually happened. The text of the DEIS demonstrates that there is no basis in history or fact for prohibiting off-leash dogs at the East Beach, the promenade, and the adjacent areas.

Response: The GGNRA Dog Management Plan/EIS is intended to analyze impacts to park resources from dog walking activities. Therefore, impacts to resources related to other recreational activities at the park will not be analyzed in this document.

Concern ID: 30168
CONCERN STATEMENT: Commenters believed the impacts of dogs were overstated in the draft plan/EIS, and do not agree that dogs have an impact on the resources at GGNRA, including water quality, soil, erosion problems or fecal contamination, or that non-compliance causes impacts. Alternately, other commenters felt that the impact of on-leash and off-leash dogs is being underestimated, and that dogs significantly impact the environment. The draft plan/EIS should include impacts from condensing dogs into a smaller area as is proposed in the plan.

Representative Quote(s): **Corr. ID:** 420 **Organization:** none
Comment ID: 181603 **Organization Type:** Unaffiliated Individual
Representative Quote: You talk about "fear of dog bites," yet offer no evidence that this is a problem. While you talk about environmental concerns with dog waste there again there is no evidence that dog waste is polluting the waters of the state, and in fact if DNA were done, I think you would likely find the pollution, if any, would be from people and birds.

Corr. ID: 1595 **Organization:** *Not Specified*
Comment ID: 190827 **Organization Type:** Unaffiliated Individual
Representative Quote: I discovered Ft. Funston 3 years ago when I first received out dog and have been going there every week since. From the beginning, I was amazed at how responsible the majority of dog owners are at cleaning up after their dogs. I see NO adverse affects from the dogs at this location. What I see is a vibrant community of dog owners who travel from all over to enjoy one of our last resources available to let our dogs run off leash.

Corr. ID: 1715 **Organization:** *Not Specified*
Comment ID: 191157 **Organization Type:** Unaffiliated Individual
Representative Quote: 1) Chapter 3 table 6 stated only 3 incidents @ Muir Beach. Yet you're closing the beach. Seems to me that the environmental impacts reported do not substantiate the recommend proposal.

(1a) Muir Beach has fewer incidents than Stinson yet is more restrictive. Don't understand logic

Corr. ID: 1893 **Organization:** University of San Francisco
Comment ID: 200617 **Organization Type:** Unaffiliated Individual
Representative Quote: Along those lines, these proposed changes may very well end up creating some of the very problems that the dog management plan is purportedly seeking to avoid. Again and again in the environmental field, we see this same story- that when spread over a large space, an impact can have very minimal effects, but when concentrated on a single area, the effects may overwhelm the local ecosystem. There are very few open spaces where dogs are allowed along the Peninsula. Sweeney Ridge is one of them. But the preferred plan concentrates dogs to a very small area of Cattle Hill. So if all of the dogs that are currently spread out over the entire area suddenly condense into a single spot, what will those impacts be?

Corr. ID: 2201 **Organization:** Little Fluffy Clouds
Comment ID: 200704 **Organization Type:** Unaffiliated Individual
Representative Quote: 2. Dogs do not have a negative impact on the environment. I feel strongly that the singling out of dogs as the perpetrators of soil erosion and damage on NPS land is absurdly overstated. They no more erode the land and arguably do less damage than the daily sightings of hikers, casual walkers, horses, mountain bikers or fishermen

Corr. ID: 2284 **Organization:** Golden Gate Audubon Society and Santa Clara Valley Audubon Society
Comment ID: 201155 **Organization Type:** Unaffiliated Individual
Representative Quote: In my experience, the negative impact of off-leash and even-on leash dogs is being vastly underestimated. No matter what the leash laws are, it seems people won't obey them. So, at a minimum any off-leash areas need to be fenced, to clearly demarcate the approved off-leash areas. There must be no confusion.

Corr. ID: 3737 **Organization:** SF Dog Owners Group
Comment ID: 204263 **Organization Type:** Unaffiliated Individual
Representative Quote: Non-compliance does not equal negative impacts - The DEIS assumes that non-compliance with leash restrictions means there are negative impacts on environment by dogs. Yet there is no evidence that impacts actually happen. DEIS has to re-evaluate that assumption and must base any conclusion on actual documented impacts.

Corr. ID: 3762 **Organization:** *Not Specified*
Comment ID: 204662 **Organization Type:** Unaffiliated Individual
Representative Quote: I am very familiar with your proposal and am extremely opposed to it. The GGNRA was established as a recreation area. Your report barely makes reference to that use. As someone extremely familiar with all the local GGRA in which dogs are allowed, I find little evidence that dogs have any significant impact on the native animal nor plant environment. I believe that dogs have less of a negative impact than certainly people-as well as other recreational users. But not only has my personal observation supported that-more importantly the GGNRA's proposal cites reasons for the severe limitations of dogs-both on-leash and off-leash-are NOT supported by scientific evidence

Corr. ID: 3789 **Organization:** *Not Specified*
Comment ID: 205543 **Organization Type:** Unaffiliated Individual
Representative Quote: 2. The authors of the document clearly did not have a good grasp on the experience of local residents using the GGNRA, or give the reader much context of the dense urban setting that surround the GGNRA. The document should be revised to include the experiences of local residents as well as much better characterization of the local setting (i.e. the urban environment). In my personal experience in the areas that I visit almost daily in the GGNRA, conflicts with dogs very rarely occur, dog walkers are extremely respectful, and dogs are generally very well behaved. While incidents may occasionally occur (though I have never witnessed an incident in my many years of visiting the park), there is no clear evidence presented in the document of a major issue

Response:

Chapter 4, Impact Analysis was revised to include additional data as rationale. Impacts to soils have been encompassed under vegetation instead of as a stand-alone resource. 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. 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. Also, a more detailed impacts analysis on nearby dog walking areas has been included in the draft plan/SEIS that considers the effects of overcrowding.

Concern ID:
CONCERN
STATEMENT:

30173
Law Enforcement data - some commenters felt that law enforcement data from the park does not support restricting/limiting/banning dogs at GGNRA sites because the data do not present a real issue or the issues are very small as a result of dogs at the park. Alternately, other commenters felt this data was inadequate because it does not show the true numbers of violations, as many incidents go unreported. There should be some estimate of the number of total violations in the draft plan/EIS.

Representative Quote(s): **Corr. ID:** 1510 **Organization:** *Not Specified*
Comment ID: 191427 **Organization Type:** Unaffiliated Individual
Representative Quote: Your own data do not support your claim that off leash dogs represent a safety concern and are a threat to non-dog people.

From 2001-2006, the latest years for which data is available, there were only a total of 2,865 pet-related incidents recorded by the GGNRA; this is out of 226 MILLION dog visits during the same period. Clearly either dogs are not a problem or you are unable to enforce existing laws.

Corr. ID: 1850 **Organization:** *Not Specified*
Comment ID: 192040 **Organization Type:** Unaffiliated Individual
Representative Quote: iii)The DEIS provides no support for a significant impact on visitor and employee safety from dog walking as indicated by the following:

- An extremely small amount of Law Enforcement (LE) time is currently devoted to dog management issues. The DEIS states (p. 283)that "Approximately 1 percent of LE (law enforcement) time is devoted to dog management- related issues." If dog walking is such a major issue for visitor and employee safety as suggested in the Need for Action, why is law enforcement only spending one percent of its time on dog management issues?

To illustrate effort devoted by LE to pet related issues, the DEIS provides statistics on incidents and case reports related to dogs and visitors during 2007-2008 in table 9 provided in Appendix G. The data in this table reflect the heavy emphasis on leash law enforcement with over 70% of the 2,424 incidents defined as a leash law violation. In contrast, only 9% of the incidents reflected violations for serious infractions such as dog attacks/bites (2%), disturbing wildlife (2%), and hazardous conditions/pet rescue (5 %). Moreover, over one third of the incidents recorded in Table 9 were based on reports from the public, not on incidents where park service personnel were present at the time of the alleged violation. With only 1% of LE time devoted to dog management issues and with 70% of that time devoted to leash law violations, the portion of LE time devoted to health and safety issues for visitors and and employees related to dogs (as well as wildlife disturbance) is less than three tenths of one percent.

Corr. ID: 3149 **Organization:** *Not Specified*
Comment ID: 203979 **Organization Type:** Unaffiliated Individual
Representative Quote: The EIS should estimate the actual number of incidents that occur within the GGNRA. Table 6 (p. 230) indicates the recorded incidents involving dogs in 2007 and 2008. It is stated that these numbers of incidents of visitors not complying with dog walking regulations is not equal to the number of actual violations occurring at the park. Being that many violations occur which are not observed or un-reported, some estimate of the total amount of violations should be included in the EIS such that each documented violation would be representative of a certain amount of actual violations.

Corr. ID: 4069 **Organization:** *Not Specified*
Comment ID: 207660 **Organization Type:** Unaffiliated Individual
Representative Quote: The DEIS suggests that compliance with current dog regulations is poor, but the document doesn't place the number of documented incidences of noncompliance in context with the total number of visits by dogs. On any given weekend day at Crissy Field, I would

estimate around 700 dogs visit the area. The DEIS lists around 250 leash law violations over a one-year period at Crissy Field, which in the context of tens of thousands of dog visits over that same period seems extremely low. However, the DEIS uses these incomplete statistics about noncompliance to justify the implementation of the compliance-based management strategy if compliance with new regulations falls below 75%.

Corr. ID: 4660 **Organization:** *Not Specified*
Comment ID: 209834 **Organization Type:** Unaffiliated Individual
Representative Quote: The adverse impact statements claimed in the DEIS are arbitrary and subjective, even if one doesn't consider the cumulative impacts on Public Safety (e.g., dog behavior, other adjacent lands, health benefits, responsible dog guardianship, etc.) with not clear explanation for the differences (e.g., number of past incidents, number of visitors, etc.) Below is a table showing the highest level impact claimed in the DEIS in Table 5. For example, there seems no justification for listing Milagra Ridge and Pedro Point as Minor while Sweeney Ridge and Mori Point are negligible. In fact, even using the questionable numbers on page 271, no location other than Stinson Beach and Fort Funston have more than ten combined dog "bite/attacks" and hazardous condition incidents. In reality, only Fort Funston and Ocean Beach, with more than 2,000 average daily visits, had any serious incidents in 2007 or 2008 on the trails or on the beach.

Response: Additional law enforcement data are presented in chapter 3, Visitor Use and Experience. These data were used to revise the impact analysis in chapter 4. While GGNRA cannot provide an exact number of incidents that go unreported, even if law enforcement data undercounts incidents, the data substantiates a need to regulate dog walking to protect resources, diverse visitor experiences, and health and safety.

Concern ID: 31406
CONCERN STATEMENT: The draft plan/EIS does not adequately discuss impacts to species of special concern; the draft plan/EIS should focus not only on species listed under Federal and State ESA lists, but also non-ESA species of concern. Some commenters noted that the importance of special status species populations in the GGNRA to the recovery of the species overall needs to be considered. Impacts should be based on impacts to the recovery of the species, not the localized population.

Representative Quote(s): **Corr. ID:** 3149 **Organization:** *Not Specified*
Comment ID: 203978 **Organization Type:** Unaffiliated Individual
Representative Quote: Species of Concern - The DEIS does not fully describe the sensitivity of some habitat areas including Ocean Beach and Fort Funston. The plan considers species listed under the Federal and State ESA's but does not sufficiently describe non-ESA species of concern as listed by the IUCN, the American Bird Conservancy, National Audubon, and locally known species of concern. Species of local concern include:

Allen's Hummingbird
Black Turnstone
Brant

Bryant's Savannah Sparrow
Burrowing Owl
California Thrasher
California Quail
Clarks Grebe
Elegant Tern
Heermann's Gull
Hermit Warbler
Loggerhead Shrike
Long-billed Curlew
Long-eared Owl
Marbled Godwit
Northern Harrier
Nuttall's White-crowned Sparrow
Nuttall's Woodpecker
Olive-sided Flycatcher
Pelagic Cormorant
Red Knot
Sanderling
San Francisco Common Yellowthroat
Short-billed Dowitcher
Snowy Plover
Surfbird
Thayer's Gull
Tricolored Blackbird
Varied Thrush
Wandering Tattler
Western Sandpiper
Whimbrel
Wrentit
Yellow Warbler

Corr. ID: 3945 **Organization:** *Not Specified*
Comment ID: 227101 **Organization Type:** Unaffiliated Individual
Representative Quote: Fully disclosed the significance of the GGNRA protected species population to the recovery of the species and only reduce recreation if the recreation is proven to significantly impact the recovery of the species and other less extreme management changes are not available.

Response: The impact analysis to special status species was revised in chapter 4. Please see chapter 4 for more detail.

Concern ID: 31740
CONCERN STATEMENT: Findings on dogs chasing snowy plovers (presented in appendix G) are often inaccurate and are actually accounts of dogs chasing other species that are not endangered.

Representative Quote(s): **Corr. ID:** 4678 **Organization:** Ocean Beach Dog
Comment ID: 227518 **Organization Type:** Civic Groups
Representative Quote: Many of the findings in the Draft Plan/DEIS are founded on a reference included in the document as Appendix G, "Law

Enforcement Data" (NPS 2008c). This reference document is critically deficient in substantiating statements made in the characterization of existing conditions and in the analysis of the environmental consequences. For example, an entry is as follows: "observed a black dog chasing a flock of 14 snowy plovers. I observed the dog chasing the birds from the water to the dunes and up and down the beach for several hundred meters north and south. The dog would charge at the birds and the Plovers would fly away from the dog. Each time the Plovers would attempt to land, the dog would charge directly at them and cause them to take flight again. I watched this happen for continually for eight minutes timed by my watch from 1150 to 1158 hours. Then the dog stopped chasing the Plovers and wandered in the hilly dunes to the north for several minutes. The dog then returned to chasing the Snowy Plovers for a few minutes more ... After the dog ceased chasing the Plovers, they stopped taking flight and started feeding at the water line." Clearly, if this dog was chasing plovers, they would not have returned to feeding at the water line after the chase was over. Plovers feed at the high tide line when the water has already retreated. These were sanderlings, birds that appear almost identical to the plover, are plentiful at Ocean Beach (not threatened or endangered) and can be differentiated by different feeding patterns and different resting patterns.

Response:

Appendix G has been updated with new information regarding snowy plovers. The park conducted a literature review and incorporated new peer-reviewed reports.

GR2010 – GEOLOGIC/SOIL RESOURCES: AFFECTED ENVIRONMENT

Concern ID:

29504

CONCERN STATEMENT:

Dogs are hazardous to soil resources. Off-leash and on-leash dog walking results in soil compaction, erosion, and the creation of social trails, while dog waste alters soil chemistry. Off-leash dogs also dig, resulting in damage to dunes and other soil resources.

Representative Quote(s):

Corr. ID: 1160

Organization: *Not Specified*

Comment ID: 193467

Organization Type: Unaffiliated Individual

Representative Quote: last week I watched in horror as a dog owner allowed his large on-leash dog dig a 2 foot deep by 1 foot wide hole in one of the man-made grass-covered fenced-off dunes at Crissy Field. The dog must've been searching for a ground squirrel or something like that. But the dog was so big and strong, that the owner couldn't control him. The biggest problem is that owners can't control dogs that are off-leash, but some can't even control them when they are on-leash.

Corr. ID: 4282

Organization: *Not Specified*

Comment ID: 209049

Organization Type: Unaffiliated Individual

Representative Quote: Current dog use of the GGNRA is unsupportable. At Fort Funston the spider web of dog trails has caused significant erosion. We have watched dogs chase shorebirds at Ocean Beach. Some people have a fear of dogs. I know those who avoid Fort Funston and Crissy Field Beach because of the large number of unrestrained dogs running around. Most

importantly, unrestrained dogs are a threat to wildlife, including endangered species like the Snowy Plover.

Corr. ID: 4683

Organization: *Not Specified*

Comment ID: 210169 **Organization Type:** Unaffiliated Individual

Representative Quote: Dog litter: Besides their presence, dog related litter is a significant problem. Though many owners pick up their dog's waste, there are those who do not. In fact nobody cleans up urine.

The amount of dog urine, combined with feces that is not picked-up or remains after most of it is removed causes heavily used areas like Fort Funston to smell, thus making it unpleasant for visitors who are not dog owners. It also impacts soil chemistry in ways never explained. Investigated to our knowledge. or mitigated. We have no idea what the impact on soil chemistry might be, but it would seem that wherever dogs are permitted, an environmental impact report should be developed to deal with that. "That study should identify impacts on microorganisms, invertebrates, vertebrates and plants. Since our National Parks are supposed to protect the resource of each park, it seems incumbent on the National Park Service (NPS) to undertake that analysis if dogs are permitted in any part of GGNRA..

Response:

There are no scientific studies or monitoring studies that support the impacts to soils as a result of dogs. There is general agreement that dog activities (digging, trampling) and dog waste/nutrients affect soils, but this impact cannot be isolated or quantified. After further consideration, NPS determined an analysis of impacts to soils was not warranted and this topic was dismissed. Please see chapter 1 for the complete discussion of why the topic was dismissed. Impacts from dog walking to soils can affect vegetation and these impacts are discussed in the vegetation section, as applicable (dunes, coastal scrub/chaparral).

Concern ID:

29505

CONCERN STATEMENT:

Other factors contribute significantly to soil erosion, particularly human recreational activities like hiking, biking, children playing, horseback riding, and Park Service activities. Many natural factors, including wind and rain, also contribute to soil erosion and compaction, not dogs. The draft plan/EIS does not report these soil impacts from other user groups. The effects of erosion are not visible, and are not attributable to dogs alone if present.

Representative Quote(s): **Corr. ID:** 1134

Organization: *Not Specified*

Comment ID: 192461 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS report accuses dogs of degrading the land and compacting the soil. (DEIS, p. xxi, p. 225) On our walks at Fort Funston, I have observed many other forms of recreation that "degrades" the soil: hikers, bikers, joggers, kite flyers, hang gliders, surfers, children rolling down dunes, horse back riders, and remote control car hobbyists. The DEIS report fails to show what soil degradation can be attributed to these activities as well as the effects of nature: wind, rain, ravens, raccoons, seismic activity, and burrowing animals. The restrictions which would confine off-leash dogs to a few acres is overly severe unless restrictions were placed on everything that affects the environment, and then only in

proportion to the extent of the effect. The document should be revised to provide scientific evidence that shows the impact of all the contributors of soil degradation and the percentage of impact each contributor is responsible for. Until that time, I strongly oppose any change in the leash laws at Fort Funston.

Corr. ID: 2899

Organization: *Not Specified*

Comment ID: 203047

Organization Type: Unaffiliated Individual

Representative Quote: Dogs are not responsible for the degradation of the park, nor its trails. The vast majority of damage is from humans. Soil compaction, waste, wildlife disturbances and resources are affected by people way more than by dogs. In reality, dogs are less of a problem than the horses that are allowed on trails, the bicycles, and even by the Park Service vehicles on the fire roads!

Corr. ID: 4311

Organization: *Not Specified*

Comment ID: 209353

Organization Type: Unaffiliated Individual

Representative Quote: The DEIS does not adequately address recreational components other than dogs and so one cannot logically conclude that it is the dogs/dog walkers that are causing the problems. Chapter 3, p.225, states that at Fort Funston "soil compaction is common along social trails that have been created by--and e heavily used by--bikers, hikers, runners, and dog walkers " As a long-time Fort Funston user, I know this is true. I know also that horses are probably the biggest cause of soil compaction and feces. However, horses are not mentioned. At Ocean Beach, large foot races such as the "Turkey Trot" have taken place during the time the beach is closed to off-leash dogs because of the Snowy Plover's presence. The DEIS needs to do a more thorough job of identifying a full set of recreational components at each location where changes are proposed

Corr. ID: 4312

Organization: *Not Specified*

Comment ID: 209373

Organization Type: Unaffiliated Individual

Representative Quote: This human activities impact is a case of "we have met the enemy and they is us." Or, to be more exact, they is GGNRA personnel and GGNRA contractors. The truth is that an impact on the Oakwood Valley Fire Road/Alta Avenue routes that dog walking may have is trivial compared to that perpetuated by GGNRA personnel and GGNRA contractors. Winter after winter I have seen park and contractor vehicle using Alta Avenue (and the adjacent roads) while those roads were still wet and muddy. These vehicles' wheels make ruts in the rain softened roads. The runoff from the subsequent rains run down these ruts and end up causing severe erosion of the roads. To mitigate the damage to the roads caused by your own vehicles using them in winter when the roads are wet, huge Caterpillar earth movers are brought in during the dry season, at significant expense I am sure, to scrape another 6-inches off the surface of the roads to attempt to correct the erosion. There is no need to allow park service or contractor vehicles to use these roads to perform surveillance or other maintenance activities in winter. Their use as fire roads is not required in the middle of winter. The GGNRA should create administrative rules that prohibit the use of these dirt roads by park and contractor vehicles when they are wet and muddy until they dry out, except in cases of emergency.

Corr. ID: 4404 **Organization:** *Not Specified*
Comment ID: 209333 **Organization Type:** Unaffiliated Individual
Representative Quote: The proposal claims that impacts to physical resources would be from negligible to ADVERSE because of dogs. That is a very open statement; to determine how to proceed, it would have to be more specific to be of any value. Rodeo Beach hasn't changed in all the years we have walked there, and I don't see how dogs have had any adverse effect on it, or how any "severe" effects could be envisioned. This needs more clarification as to exactly WHAT is meant by "adverse" impacts. Otherwise it sounds like someone who hasn't even been to these sites is merely imagining something. The same is true for Ocean Beach, Crissy Field and Fort Funston. PEOPLE walking somewhere erode the soil; dogs actually cause less erosion. Enforcement of dog-waste regulations would avoid any other form of degradation that I can imagine.

Corr. ID: 4405 **Organization:** Montara Dog Walking Group
Comment ID: 204930 **Organization Type:** Unaffiliated Individual
Representative Quote: The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. At about 200 pounds per adult, the force that a human exerts on the soil one foot at a time would have a significantly greater impact on compacting the soil in a picnic area than the force exerted by even a large 70-pound dog distributing its weight on four paws. The failure to acknowledge that human use has more impact on soils and geology in this regard (and acceptable in many areas of a National Park), compared to dog use, unfairly and uncritically biases the analysis in favor of restrictions on dogs. While there may be areas in which impacts from dogs are unacceptable, the same criterion holds for impacts from humans, and in most of these areas, dogs and humans are already excluded.

Response:

There are no scientific studies or monitoring studies that support the impacts to soils as a result of dogs. There is general agreement that dog activities (digging, trampling) and dog waste/nutrients affect soils, but this impact cannot be isolated or quantified. After further consideration, NPS determined an analysis of impacts to soils was not warranted and this topic was dismissed. Please see chapter 1 for the complete discussion of why the topic was dismissed. Impacts from dog walking to soils can affect vegetation and these impacts are discussed in the vegetation section, as applicable (dunes, coastal scrub/chaparral).

Concern ID:
CONCERN
STATEMENT:

29506
[The draft plan/EIS fails to address toxic substances and unexploded ordinances remaining at Fort Funston that could contribute to soil contamination.](#)

Representative Quote(s): **Corr. ID:** 4622 **Organization:** *Not Specified*
Comment ID: 207082 **Organization Type:** Unaffiliated Individual
Representative Quote: Water Discharge/Erosion of Cliffs/Toxic Substances -

The DEIS fails to address the toxic substances which remain at Fort Funston due to the occupation of the site by Coast Artillery in World War II and the subsequent use as an Army Nike missile site. There is no reference to the leaching of these toxic substances and their effect on the environment. While it is true that a certain amount of mitigation of hydraulic fluid from Nike missile handling equipment still remaining on the site and still underground has been done, the very personnel performing the mitigation for the Federal government indicated they don't really know what else is underground, where all the equipment is actually located, what the current condition of that equipment is, and, last but not least, where it will leak next. The DEIS also fails to address unexploded ordinance which continues to still be discovered at Fort Funston. The DEIS also fails to address the exploded ordinance (lead) mixed into the soil throughout the site and still being discovered by even the most casual observer.

Response:

There are no scientific studies or monitoring studies that support the impacts to soils as a result of dogs. There is general agreement that dog activities (digging, trampling) and dog waste/nutrients affect soils, but this impact cannot be isolated or quantified. After further consideration, NPS determined an analysis of impacts to soils was not warranted and this topic was dismissed. Please see chapter 1 for the complete discussion of why the topic was dismissed.

GR4000 – GEOLOGIC RESOURCES: IMPACT OF PROPOSAL AND ALTERNATIVES

Concern ID:

29507

CONCERN STATEMENT:

Minimizing the space available for off-leash dog recreation will cause greater impacts to areas where dogs are allowed under the new plan, as dogs will be concentrated, and their impacts will be greater.

Representative Quote(s):

Corr. ID: 1850

Organization: *Not Specified*

Comment ID: 192048

Organization Type: Unaffiliated Individual

Representative Quote: The forced concentration of dogs with individual and commercial dog walkers in a severely limited space is likely to result in significant increase in conflicts between dogs/dog walkers, conflicts with other activities in the designated space, degradation of soil/vegetation in restricted space, and pressure to find other areas for off leash dog walking that are not permitted under Plan,

Corr. ID: 4302

Organization: *Not Specified*

Comment ID: 208955

Organization Type: Unaffiliated Individual

Representative Quote: If GGNRA is able to provide new recreational areas for dog off-leash recreation, it would be a great compromise to the proposed restriction. The present proposed small areas will cause conflicts for both people and dogs if they restricted to a small area. Though causing severe erosion/damage to the small limited areas from over use.

Response:

NPS would continue to provide seven ROLAs throughout the park, including a newly established ROLA at Fort Mason. None of the GGNRA sites would prohibit dogs under the preferred alternative and all dog

walkers, including commercial dog walkers, would be limited to 3 dogs, unless they apply for and are issued a permit for up to 6 dogs. Compared to alternative A, the preferred alternative would decrease the available on-leash dog walking on trails/roads by approximately 6 miles and by 12 acres in other on-leash dog walking areas; off-leash dog walking would be reduced on trails/roads by approximately 31 miles and in other areas by 107 acres . With the exception of the ROLA at Fort Mason, most of the areas designated as ROLAs have been previously disturbed. Impacts from dog walking to soils can affect vegetation and these impacts are discussed in the vegetation section, as applicable (dunes, coastal scrub/chaparral).

HS2010 – HEALTH AND SAFETY: AFFECTED ENVIRONMENT

Concern ID: 29730

**CONCERN
STATEMENT:**

Visitors noted that they felt their safety was compromised by having off-leash dogs in GGNRA. More specifically, many visitors cited concerns about safety of small children when they visited GGNRA, and noted that the current atmosphere made them avoid the parks with their children or grandchildren.

Representative Quote(s): **Corr. ID:** 319

Organization: *Not Specified*

Comment ID: 181075 **Organization Type:** Unaffiliated Individual
Representative Quote: This is a liability issue as well as a health & safety issue. If the GGNRA does not get increasing complaints about injuries from dogs, it is because persons (esp., seniors such as ourselves) have avoided areas where we would otherwise have wished to walk, but can no longer do so because of threats against our health & safety. Some may say that it is only a few humans who do not walk/exercise their dogs safely & responsibly, but one dog running & jumping upon us viciously (nearly biting us on the neck) is enough to require us to return home and avoid that area in the future

Corr. ID: 727

Organization: *Not Specified*

Comment ID: 182737 **Organization Type:** Unaffiliated Individual
Representative Quote: So, contrary to dog owners phrase "don't worry he's friendly," I worry a lot! The stress of being around dogs raises people's blood pressure and adversely affects their health. It raises mine. It also affects my mental health. I want to go to the park to relax but instead it worsen my mental health.

Corr. ID: 2278

Organization: Neighbor

Comment ID: 201072 **Organization Type:** Unaffiliated Individual
Representative Quote: I live in Cow Hollow and I walk on Crissy Field at least 5 times a week. I am 69 years old. The dog problem there is not going to be solved by the recommended Alternative. Dogs and their owners will still make it unpleasant, unsafe, and unhealthy for adults and especially for children.

The beaches where dogs are allowed are awful. They are basically dog bathrooms. I am sure they are a public health hazard. Innocent children wander into these areas to play. They dig in the sand and put the sand in

their mouths. I am horrified. I will not take my grand children anywhere near these places.

The leases people use for their dogs are often 20 feet long. Virtually every time I walk there I have a dog run into me, wrap a lease around me, or accost me. I have grandchildren and I fear for their safety

Corr. ID: 4278 **Organization:** *Not Specified*
Comment ID: 209073 **Organization Type:** Unaffiliated Individual
Representative Quote: It is too dangerous to allow any dog to roam without a leash. One never knows when a dog may bite, especially a child whose face is close to the level of the dog's mouth. Even adults may feel uncomfortable when approached by an unfamiliar dog.

It is not fair to those who use the parks to have to deal with the issue of unruly dogs off a leash, who may be running hard and inadvertently knock a child or an elderly person to the ground. Also who wants listen to barking dogs or step in dog excrement and drag that around on a shoe to one's car? Nor is it fair to place a burden on the staff to ride herd on people who do not obey the laws.

Corr. ID: 4469 **Organization:** *Not Specified*
Comment ID: 208697 **Organization Type:** Unaffiliated Individual
Representative Quote: I have been knocked down twice by off-leash dogs. They meant no harm; they were just out of control. Once dogs are in an area, it becomes a dog area and no other use is safe or enjoyable. How many areas like Fort Funston are you going to turn over for dog use, which essentially excludes all other uses?

Response:

The health and safety section has been revised to incorporate these safety concerns of the elderly and small children. Similarly, the analysis of visitor use and experience has been revised to include impacts to visitors who may have safety concerns, including guide dogs, elderly visitors, and those with small children. Please see chapter 3, Human Health and Safety, and Visitor Use and Experience for more details.

Concern ID:
CONCERN
STATEMENT:

29731
Visitors did not feel that the presence of dogs was detrimental to their safety. Many visitors, particularly single women or women with children, said that they felt much safer walking in GGNRA with their dog, and would be less likely to visit the park if they could not walk with their dog. Dogs and dog walkers have improved the safety of the parks by providing a constant presence.

Representative Quote(s): **Corr. ID:** 253 **Organization:** *Not Specified*
Comment ID: 180835 **Organization Type:** Unaffiliated Individual
Representative Quote: I have NEVER once felt unsafe around off-leash dogs. They are too excited exploring and romping to pay attention to me.

Corr. ID: 649 **Organization:** *Not Specified*
Comment ID: 181452 **Organization Type:** Unaffiliated Individual
Representative Quote: In addition, I have always felt much better, when my wife and children are out enjoying the beach and trails, that they have our dog with them for safety. Our dog would only lick the would-be bad guy to death, but he wouldn't know that in advance.

Corr. ID: 4026 **Organization:** *Not Specified*
Comment ID: 207081 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a woman who walks all times of day (and sometime evenings) without another person with me and I feel I need my dog with me. If dogs were banned, it would make it more challenging and would take away my access to the parks. This past week my partner was stalked and chased by a coyote in the Rancho. It was snarling, yapping and came within five feet of her. Her dog stood between her and the coyote.

Corr. ID: 4092 **Organization:** *Not Specified*
Comment ID: 208420 **Organization Type:** Unaffiliated Individual
Representative Quote: The GGNRA trails are part of an urban environment, and I know and have heard of many stories where single women have been assaulted. It is an unfortunate aspect urban life, but needs to be addressed. I do not use trails that do not allow dogs when I am hiking or running alone. I feel that the DEIS has failed to analyze the impact of restricting the off-leash area and its impact on single women users which comprise a large number of the overall users of the area.

Corr. ID: 4224 **Organization:** *Not Specified*
Comment ID: 208957 **Organization Type:** Unaffiliated Individual
Representative Quote: In all my years walking in Fort Funston and Crissy Field I have seen ZERO incidents of dogs fighting or attacking people. I have, however, run into many very frightening human characters - for example, some drunk and belligerent people camping in the bushes at Fort Funston. And I was at Fort Funston the day someone was shot and killed. Without dogs and dog walkers, I frankly think that these areas will be much more frightening to visit and I certainly would not feel so comfortable with fewer "dog people" there. Since 99% of dog walkers are responsible, I believe it is not right or fair to punish the majority for the actions of the very few irresponsible dog owners.

Response: The health and safety section has been revised to incorporate these safety concerns of walking at the park without a dog. Please see chapter 3, Human Health and Safety for more details.

Concern ID: 29732
CONCERN STATEMENT: Some commenters believe dog waste is a major issue for health and safety in the GGNRA. The amount of feces and urine is concerning, and having children playing in the same areas as this dog waste is unhealthy and unsanitary. Dog feces carry many parasites and diseases. Other commenters state that the impact of dog-related pathogens is not proven in the draft plan/EIS, and it is unlikely that dog waste is introducing dangerous pathogens to park visitors.

Representative Quote(s): **Corr. ID:** 930 **Organization:** *Not Specified*
Comment ID: 191398 **Organization Type:** Unaffiliated Individual
Representative Quote: The feces left by dogs present an infectious disease hazard. They carry a number of intestinal parasites or worms such as roundworms, hookworms, and coccidia, some of which can infect humans. They also carry Brucella, Campylobacter, Cryptosporidium, Giardia, Lyme Disease, Coxiella, Rabies, Salmonella, and Rocky Mountain Spotted Fever, many of which can be transmitted by exposure to their feces or by dog bite. At San Francisco General Hospital, we have seen over the years innumerable dog bites and many of these parasitic and bacterial infections transmitted by dogs.

Corr. ID: 2802 **Organization:** *Not Specified*
Comment ID: 201099 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs at Crissy Field are a health and safety hazard as well as a threat to wildlife. They foul the sand and grass where children play, and run-off goes into the bay. Joggers get tripped as I once was, injuring my shoulder. I've stopped jogging there and long ago stopped bringing my granddaughter.

Corr. ID: 3174 **Organization:** *Not Specified*
Comment ID: 203741 **Organization Type:** Unaffiliated Individual
Representative Quote: There is inadequate enforcement in Marin to manage bad dog owners/walkers. Observe the environmental damage and lack of leash enforcement near Mill Valley Bayfront Park and Dog Area. Observe dog feces in the sand in children's play areas. A birthday party or social gathering for kids in many city parks results in dog feces on shoes and play balls. There is even less enforcement in the GGNRA.

Where ever dogs are allowed there will be environmental impacts and health risks to kids. The less access for dogs the better

Corr. ID: 4318 **Organization:** *Not Specified*
Comment ID: 209419 **Organization Type:** Unaffiliated Individual
Representative Quote: I have a six year old son and I frequently take him to the Crissy Field Beach, and we are constantly over-run by off-leash dogs who have taken over the beach. The dogs urinate and defecate all over the beach, and while many owners do clean up their dog's poop, some do not and no one can do anything about all the dog urine all over the beach. Kids who play in the sand are constantly exposed to this dog urine and excrement, which is both unpleasant and unhealthy. On many occasions my son has been approached by a fast running dog, which has often frightened him. I have refrained from taking my son to Fort Funston at all, despite the beautiful vistas and the interesting hang gliders, due to that park being completely overrun by off-leash dogs that spoil the park experience for anyone who is not a dog owner.

Corr. ID: 4660 **Organization:** *Not Specified*
Comment ID: 227445 **Organization Type:** Unaffiliated Individual
Representative Quote: Safety in the Park In particular, there is no public health and safety epidemic related to dog feces or dog pathogens. Even in

the unlikely event that people contract these diseases the odds of serious medical issues is negligible and certainly not any more severe than pathogens from other sources, such as wildlife droppings and city street run-offs, in the GGNRA. Per the Park Service response to my FOIA request, the Park Service has no evidence of pathogen transmission in the GGNRA and is purely relying on listing of possible dog related diseases. Certainly, the 1 in 3 families in America with dogs, do not deem these to be significant risks that would cause them to not associate with dogs.

Response:

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.

Concern ID:

29734

**CONCERN
STATEMENT:**

The statistics provided on dog incidents do not indicate there are significant health and safety concerns related to dogs. Many of the claims made about health and safety are not shown by the numbers, particularly given the high use and visitation of sites in the GGNRA.

Representative Quote(s):

Corr. ID: 1803

Organization: *Not Specified*

Comment ID: 191653 **Organization Type:** Unaffiliated Individual

Representative Quote: Severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. Target enforcement on the small number of people whose dogs misbehave, not on excluding the entire class of people with dogs from most of the GGNRA.

For example, the DEIS mentions that disease "could" be transmitted to people from unpicked-up dog feces. However there has not been a single case of dog-feces-caused human illness reported by the San Francisco Department of Health for over 50 years. A management policy should not be based on hypothetical impacts. It should be based on actual, observed impacts. Hypotheticals that are not actually seen in the GGNRA cannot be used to justify restrictions on off-leash recreation in the GGNRA.

Corr. ID: 3777

Organization: *Not Specified*

Comment ID: 205142 **Organization Type:** Unaffiliated Individual

Representative Quote: Problem interactions between park visitors and off-leash dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA. Visitor fears of being attacked by an off-leash dog are fears based on emotion, not empirical evidence. The vast majority of citations in the GGNRA are leash law violations or being in closed or restricted areas and did not reflect any safety issues between dogs and park visitors.

Corr. ID: 4091

Organization: Crissy Field Dog Group

Comment ID: 208393 **Organization Type:** Unaffiliated Individual

Representative Quote: For example, Page 71 of the DEIS asserts:

"Particularly on nice days, the high level and variety of visitor uses have resulted in conflicts, including intimidation, dogs knocking people over, dog-on dog fights and dogs biting people". We have looked through this 2,400-page document, and have found nothing to substantiate this anecdotal assertion. Examination of the enforcement data summary table in Appendix G of the DEIS (Page G-1 to G-2) frequently cited in the DEIS, indicates does not support this assertion and indicated limited problems (see Appendix C of CFDG comments).

Corr. ID: 4363 **Organization:** *Not Specified*
Comment ID: 209106 **Organization Type:** Unaffiliated Individual
Representative Quote: The study itself shows that only 2% of serious safety incidents involve dogs. Yet it claims that dogs present a serious risk. And it never even considers comparing this 2% with the numbers of women who would be accosted if they did not have dogs at their sides.

Similarly, the study claims to be interested in protecting wildlife, but the data just don't add up. First, there must be data collection at the different GGNRA sites, and then, if there is a proven harm caused by dogs (as opposed to natural predators), you must enlist professional help in finding simpler ways to solve the problem rather than going first to banning dogs. The same is true of concerns about the cliffs; instead of banning dogs you could simply install low fences.

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.

HS4000 – HEALTH AND SAFETY: IMPACT OF PROPOSAL AND ALTERNATIVES

Concern ID: 29735
CONCERN STATEMENT: Closing sections of GGNRA to off-leash dog walking will force dog owners to walk on residential streets, increasing the safety risks to these dog walkers. These restrictions may also force dog walkers to areas that are more treacherous or dangerous, and visitors would be impacted by more safety risks.

Representative Quote(s): **Corr. ID:** 543 **Organization:** *Not Specified*
Comment ID: 181969 **Organization Type:** Unaffiliated Individual
Representative Quote: Closing this space to dog walking eliminates any safe opportunity for dog walking in the community. Closing this space to dog walking will force me and many neighbors to walk their pets up and down residential streets (no sidewalks), many times in the dark (few streetlights). This would create unsafe conditions for the dog walkers, the dogs, and the car drivers (as most of us are).

Corr. ID: 730 **Organization:** *Not Specified*
Comment ID: 182725 **Organization Type:** Unaffiliated Individual
Representative Quote: As a San Francisco resident and dog owner, I am ABSOLUTELY OPPOSED to your new regulations, that will force most of us, law abiding dog owners to walk and run in other places, on the streets,

creating a hazard for ourselves, our beloved dogs and to the traffic in general.

Corr. ID: 1835 **Organization:** *Not Specified*

Comment ID: 191986 **Organization Type:** Unaffiliated Individual

Representative Quote: A final issue is that the GGNRA proposal did not consider the impact of depriving dog owners of these parks and forcing us to try finding alternative areas that may be less safe or even dangerous such as the deceptive and treacherous rip tides present along the coast of many beaches in the bay area. In the last two years two women have lost their lives trying to save their dogs caught in rip tides along Northern California beaches (see references 5 and 6).

Response:

A dog walking redistribution survey was developed, completed, analyzed, and incorporated into the impact analysis. Please see chapter 4, Human Health and Safety for more details.

Concern ID:

29736

**CONCERN
STATEMENT:**

Having more restrictions on dog walkers will be beneficial, as it will reduce the number of dog bites that put children at risk if enforced. This would also allow those who are allergic to dogs or afraid for their safety to enjoy more areas of the park.

Representative Quote(s): **Corr. ID:** 2304 **Organization:** *Not Specified*

Comment ID: 200610 **Organization Type:** Unaffiliated Individual

Representative Quote: This last weekend, we were walking with our granddaughters, ages 7 and 9, where there were several dogs off leash. Although I have no doubt that the dogs were friendly enough, their enthusiasm scared both our girls, to the point of their wanting us to pick them up. also have significant allergies, that I can manage with daily medication. One close encounter with fur can set me back the rest of the day. I would like to have enjoyed our day without all the drama.

Corr. ID: 2569 **Organization:** *Not Specified*

Comment ID: 195641 **Organization Type:** Unaffiliated Individual

Representative Quote: Please do not permit dogs throughout the park, or restrict them to very small areas where one does not have to encounter them. In addition to their negative impacts on sensitive wildlife and habitats, they have extreme negative impacts on me. I am severely allergic to dogs AND their flees. There are very few areas I can go in the Bay Area for a wilderness walk (or any walk) without encountering not just dogs and their flees, but off leash dogs that bound straight for me. If I get within 6 feet of a dog, I end up with huge, painful welts from these dog-flee encounters that take over six months to heal. I have been disabled for 20 years with allergies. This proposal would accommodate my disability.

When I saw your proposal to limit dogs I felt like a miracle had happened. I could really, maybe, be able to take wilderness type walks again.

Corr. ID: 2885 **Organization:** *Not Specified*
Comment ID: 202923 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly support the requirement that dogs be on-leash! As an asthmatic with severe allergies to dogs, I have been hospitalized in the past by "friendly" licks on the face by golden retrievers. In avoidance of dogs, I have had to abstain from many parks in San Francisco that allow dogs off-leash. I do support fenced areas for off-leash dogs to romp and play where they will not harm people like myself or small children or sensitive wildlife.

Corr. ID: 4296 **Organization:** *Not Specified*
Comment ID: 209016 **Organization Type:** Unaffiliated Individual
Representative Quote: There are plenty of people like me who are older, small children, frail or at least not very strong. We deserve to have a place we can get to and feel safe. Why are you choosing dogs over the safety and well-being of people? I hope that you will reconsider the recommendations in the proposed plan.

Response: The health and safety impact analysis has been modified. Please see chapter 4, Human Health and Safety for more details.

Concern ID: 29737
CONCERN STATEMENT: Off-leash dog activity results in better-behaved dogs, and provides meaningful exercise and social interaction for both dogs and their owners. Being able to walk a dog in the GGNRA helps maintain a healthy lifestyle. Dogs require walks, which help owners get outside, increasing their fitness. Dog walking also provides mental health benefits by providing a social community for many people. Lastly, dog walking allows for less aggressive and safer dogs. The proposed plan will restrict seniors and others who use the park for exercising with their dogs, resulting in negative impacts to health and safety of the visitors. Some of the on-leash restrictions proposed will present dangerous situations for those walking dogs.

Representative Quote(s): **Corr. ID:** 729 **Organization:** San Francisco Resident
Comment ID: 182728 **Organization Type:** Unaffiliated Individual
Representative Quote: Please do not move forward with the proposal to limit the off-leash accessible areas in California.

As a respectful dog owner who strives to provide a healthy, satisfying life for my animal, I urge the National Park Service not to restrict off-leash dog areas in California. In addition to the positive effects they have on the physical quality of life of the animals and their owners, the area's off-leash dog parks strengthen the community by uniting residents in a casual, social setting that encourages interaction and dialog.

Corr. ID: 1696 **Organization:** *Not Specified*
Comment ID: 191110 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston-

I manage my dogs by voice control - I do not believe I can safely manage 6 of them on leash going down hill on rocks & sand toward the beach they

covet to be at. I am afraid I would be hurt regularly even attempting this - knee? Shoulder? Head? - who know?! So would other people. Many would not even consider attempting it, thus making this area less accessible! Less accessible = very bad!

Corr. ID: 4442 **Organization:** San Francisco Dog Owners Group
Comment ID: 264239 **Organization Type:** Non-Governmental
Representative Quote: Yet this DEIS contains no mention of impacts on the health or social community of people who currently walk with their dogs if access to the GGNRA is severely restricted. Therefore, the analysis of alternatives cannot be accepted.

Information on the health benefits of dogs is easy to find.

Walking with dogs has enormous health benefits for people, especially seniors. Yet there is no mention of these benefits in the DEIS.

Corr. ID: 4661 **Organization:** *Not Specified*
Comment ID: 209109 **Organization Type:** Unaffiliated Individual
Representative Quote: As a responsible pet owner and advocate for animals, I know it is crucial that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well-behaved dog. Having places where I can take long walks with Bianca allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dog and dog guardians will not have sufficient opportunity to exercise and recreate.

Corr. ID: 4693 **Organization:** *Not Specified*
Comment ID: 210091 **Organization Type:** Unaffiliated Individual
Representative Quote: The conclusions in the environmental consequences section on Human Health and Safety are flawed because they fail to consider effects on people who rely on dog walking for health benefits. They are also flawed because they fail to consider the effects of reducing access to dog walking areas on seniors and mobility-impaired people who would no longer have the same degree of access to dog walking trails and restroom facilities under the proposed action.

Response: The health and safety impact analysis has been modified. Please see chapter 4, Human Health and Safety for more details.

Concern ID: 29738
CONCERN STATEMENT: Crowding dogs into smaller areas for off-leash dog walking, or at local dog parks will result in more dog aggression, with more dogfights and altercations. This would increase the risks to the safety of dog owners and other visitors to GGNRA. The safety of the park will be compromised for many visitors, particularly women, in areas closed off to dogs. Additionally, on-leash dogs are also more aggressive and the increase in on-leash areas may increase conflicts between dogs.

Representative Quote(s): **Corr. ID:** 843 **Organization:** *Not Specified*
Comment ID: 186217 **Organization Type:** Unaffiliated Individual
Representative Quote: GGNRA's preferred alternative for Funston would limit off-leash use to the area just north of the lot, and the beach. That area would be home to a huge number of dogs, and groups would be unable to avoid other groups (and therefore, conflict, because there would be nowhere to go. Aggression is heightened for many dogs when the leash goes on, and getting your group off the trail, so another group can pass is going to be much more difficult with everyone leashed.

Corr. ID: 1351 **Organization:** *Not Specified*
Comment ID: 195202 **Organization Type:** Unaffiliated Individual
Representative Quote: I believe that banning or further limiting off leash dogs will have a negative impact on park safety. A well- used park is a safe park. Seniors and women, in particular, are often reluctant to walk alone in parks because of fears of muggings or rapes. The presence of people with well-behaved dogs off leash discourages rapists, muggers, homeless people and drug dealers from hanging out in parks. Many people, especially women like myself and elder folks, walk in the GGNRA precisely because there are so many people with off leash dogs there. The dogs provide a valuable sense of safety and security.

Corr. ID: 1955 **Organization:** *Not Specified*
Comment ID: 192706 **Organization Type:** Unaffiliated Individual
Representative Quote: These legislations will increase the chances of dogs getting into dangerous situations. They will also create overcrowding in the ROLA areas increasing the chances of problems in those areas.

Corr. ID: 4209 **Organization:** *Not Specified*
Comment ID: 208854 **Organization Type:** Unaffiliated Individual
Representative Quote: I have been taking my dogs to Fort Funston for several years, at least four (usually five) mornings a week. We typically stay for about an hour and a half, hiking the trails and socializing. These morning treks are a very important part of the day for both me and my dogs, and I strongly oppose significant restriction or elimination of off-leash dog walking within the GGNRA. My opposition derives not only from my enjoyment of off-leash dog walking, but also safety concerns of having a lot of dogs who behave differently on leash in a confined area

Corr. ID: 4340 **Organization:** *Not Specified*
Comment ID: 209475 **Organization Type:** Unaffiliated Individual
Representative Quote: When we first got Ozzie, we took him to enclosed dog parks. He was a year old and we weren't sure how strong his recall was. We soon stopped taking him to these parks when we realized how aggressive dogs became when they were enclosed. I actually wound up with a herniated disc after I had to pull Ozzie away from a dog who was attacking him, which prevented me from working, and walking him, for months. If you are to impose leash laws, these parks will become even more crowded than they already are

Corr. ID: 4479 **Organization:** Crissy Field Dog Group
Comment ID: 209663 **Organization Type:** Unaffiliated Individual
Representative Quote: In closing, I would like to add that the proposal for restricting the area dogs are allowed to run off leash to certain small areas, such as a portion of Crissy Field, is going to create aggressive dog problems. Does the GGNRA not realize that forces too many dogs into one area creates problems? This is a prescription for dog fights and worse.

Corr. ID: 4598 **Organization:** *Not Specified*
Comment ID: 210068 **Organization Type:** Unaffiliated Individual
Representative Quote: Lastly, there is an issue of crime. Fort Funston is adjacent to the city of San Francisco, which, lamentably, has a big crime problem. Excluding dog-walking from a large area will put users of Fort Funston at increased risk of falling victim to violent crime, such as assaults of various kinds and robbery. It has been my experience that the presence of dogs is a deterrent to many forms of crime.

Response:

Seven GGNRA sites would continue to provide ROLAs, including a newly established ROLA at Fort Mason. None of the GGNRA sites would prohibit dogs under the preferred alternative and commercial dog walking would be allowed, as previously discussed. The majority of ROLAs would be large enough to accommodate dogs without crowding issues. The health and safety impact analysis has been modified and a detailed analysis of impacts to nearby dog walking areas has been included in chapter 4. Compared to alternative A, the preferred alternative would decrease the available on-leash dog walking on trails/roads by approximately 6 miles and by 12 acres in other on-leash dog walking areas; off-leash dog walking would be reduced on trails/roads by approximately 31 miles and in other areas by 107 acres.

Concern ID:
CONCERN
STATEMENT:

29740
[Allowing unleashed dogs on narrow trails is dangerous, as this could allow people to fall off of trails.](#)

Representative Quote(s): **Corr. ID:** 4459 **Organization:** *Not Specified*
Comment ID: 208580 **Organization Type:** Unaffiliated Individual
Representative Quote: If the GGNRA allows unleashed animals onto these trails, some of which are so narrow at points that only single file walking is possible above 400 ft cliffs, there will eventually be an unfortunate accident and potential loss of life. The GGNRA and NPS would do well to protect themselves from potential wrongful death lawsuits by nixing this idea altogether.

Response:

ROLAs would not be established on any trails throughout the park in the preferred alternative due to safety and habitat concerns, except at Fort Funston where the upland ROLA includes portions of trails. A ROLA on a trail in Oakwood Valley has been included in two alternatives because this was a consensus decision by the Negotiated Rulemaking Committee. Please see chapter 2, Elements Common to Action Alternatives.

HS4010 – HEALTH AND SAFETY: IMPACTS OF DOGS VS. HUMANS

Concern ID: 29742

**CONCERN
STATEMENT:**

Some visitors have been growled at or approached by a dog in an aggressive stance. This was cited to be a point of concern among many commenters while walking along trails and other areas. Visitors felt that their safety was compromised by these dogs. Some visitors have been bitten by off-leash and on-leash dogs in the park. One common way visitors were bitten was during attempts to break up a dogfight. Other visitors were nipped while running, walking, or biking.

Representative Quote(s): **Corr. ID:** 2051 **Organization:** *Not Specified*

Comment ID: 200496 **Organization Type:** Unaffiliated Individual

Representative Quote: As a parent of a young child in San Francisco I'm tired of not having anywhere to go and enjoy parks and beaches without a dog terrifying my child, stepping in feces, or having dogs pee all over our sand castles (happened 5 times in 15 minutes last week on east beach in crissy field). I support a compromise that allows people and families (and people with allergies) to have certain areas off-limits to dogs and many more off-limits to off-leash dogs. My daughter just turned four and has been knocked down or chased in scary ways by untrained off-leash dogs a half dozen times.

Corr. ID: 2308 **Organization:** *Not Specified*

Comment ID: 200625 **Organization Type:** Unaffiliated Individual

Representative Quote: I frequently go to Ocean Beach and Fort Funston. Many times I have been harassed by unleashed large dogs that run up to me ferociously barking as if they are going to attack me, while the dog owner is unable to get the dog to back off. I have been scared so many times that my boyfriend thinks I should carry a weapon to the beach with me.

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.

Concern ID: 29744

**CONCERN
STATEMENT:**

Dog walkers noted that they had never seen any negative incidents between humans and dogs, and that dogfights that did occur were often very nominal.

Representative Quote(s): **Corr. ID:** 2321 **Organization:** *Not Specified*

Comment ID: 195266 **Organization Type:** Unaffiliated Individual

Representative Quote: I would like to see data supporting the claim that there are increased problems with dogs in these areas.

I have yet to witness a dog bite or attack anyone, or any serious misbehavior. I'm sure that problems occasionally happen, but is there real evidence of a major increase in the number of problems?

Corr. ID: 3555

Organization: *Not Specified*

Comment ID: 203449 **Organization Type:** Unaffiliated Individual

Representative Quote: I am firmly against the new proposal for off leash dogs at the GGNRA. I have been walking my dog on several parcels of land managed by the GGNRA over the past ten years including Crissy Field, Baker Beach, Fort Funston, and the Presidio trails. During this time I have witnessed very few incidents of the dogs creating problems. Most dog owners have their dogs under voice control and scoop the poop.

Making these areas on leash are going to increase incidents, not prevent them. I have seen runners and bikers get tangled up in leashes.

I would think the park police would have better things to do than chase after off leash dogs. Currently, dog owners police each other by chastising those who do not scoop or who have uncontrolled dogs off leash.

I hope the GGNRA reconsiders this preposterous proposal.

Corr. ID: 3888

Organization: *Not Specified*

Comment ID: 206024 **Organization Type:** Unaffiliated Individual

Representative Quote: Arriving in San Francisco, I was astonished to see - everywhere! - well-behaved, easygoing dogs trotting obediently and happily behind their owners, off leash, on the sidewalks of the city! None were snapping at children or other dogs, none were barrelling ahead of their helplessly shouting owners, none were running into traffic.

As I began to spend a lot of time in the city's parks with my own dog (also a east coast transplant), it blew my mind to see the friendly, polite interactions between all the dogs playing off-leash there.

I implore you, as an animal behavior specialist and as the lucky guardian of a life-changingly wonderful dog, don't eliminate off-leash areas in San Francisco. In doing so, you would eliminate a large source of this city's canine and human happiness quotient, and would create new dog problems you couldn't even imagine.

Corr. ID: 3907

Organization: *Not Specified*

Comment ID: 205566 **Organization Type:** Unaffiliated Individual

Representative Quote: I have literally never witnessed difficulties between dogs and others, and have always found dog owners quite respectful of others and in terms of keeping the grounds clean. In fact, it has been my experience that dogs bring so much enjoyment to everyone, that it enhances the visits for everyone...whether they are there with their dogs or alone.

Please do NOT restrict the off leash areas. I am surprised this is even on the table as a current topic. There seems to be little to no impact in the areas currently enjoyed by dogs and their people, and that there is plenty of other open space in the same parks for folks who prefer to avoid dogs to enjoy.

Corr. ID: 4175 **Organization:** *Not Specified*
Comment ID: 208750 **Organization Type:** Unaffiliated Individual
Representative Quote: Even in the evenings, and on weekends, I cannot recall ever witnessing an 'incident' of a dog biting a human, or disrupting a person's enjoyment of the recreation area. This is the pattern of usage at Crissy which is real and evident to me.

Corr. ID: 4523 **Organization:** *Not Specified*
Comment ID: 209600 **Organization Type:** Unaffiliated Individual
Representative Quote: In all my time at Crissy Field, I have seen very few incidents of dogs going beyond the fences that enclose the dunes or the marsh, and even fewer incidents of dog aggression. I have never seen a dog be aggressive to an adult or a child. With the many dogs that are there on weekdays, and the hundreds that are there on weekends, I think that is quite remarkable, and certainly does not justify the restrictions being put forth in the GGNRA's preferred alternative.

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.

Concern ID: 29745
CONCERN STATEMENT: Many visitors related stories of having dogs urinate or defecate on them or their belongings, or stories of having problems with dog waste during their experience. This poses a health risk to visitors.

Representative Quote(s): **Corr. ID:** 1169 **Organization:** *Not Specified*
Comment ID: 193541 **Organization Type:** Unaffiliated Individual
Representative Quote: Thank for this work. It is long overdue. Just yesterday while coming out of the water from surfing I witnessed a woman watch her dog defecate in the shallow water and then just walk away. It happens all the time, virtually everyday. I personally have seen dogs run up and pee on innocent bystanders - children even - who just happen to be sitting on the beach.
We look forward to reasonable limits being placed upon dog owners so that the public and wildlife may once again enjoy the beach and public property.

Corr. ID: 1681 **Organization:** *Not Specified*
Comment ID: 200230 **Organization Type:** Unaffiliated Individual
Representative Quote: These are the reasons I believe dog owners need to be accountable for their dogs, and why dogs need to be leashed at Rodeo Beach:
- I regularly find poop bags right on the beach or right off the trails. Many times these poop bags are just across the bridge from the "pet waste" container.
- Some owners don't even bother to pick up after their dogs. I can't walk barefoot at the beach without watching my every step to make sure I don't walk on pet waste.
- Dogs have eaten food right out of my hands when I'm picnicking on the beach. How can I have a picnic with my friends and family when dogs are always running up to us and taking food away from us? I don't feel safe

with the children around unattended dogs. What if one of them gets bitten? This can be how children become fearful of dogs in the first place.
- Just a few days ago I left my shoes and rain jacket on a piece of driftwood so I could walk in the waves. Then a schnauzer named Rocky peed on my belongings as Rocky's 5 adult companions looked on, assuring me that everything was all right. Rocky was not on a leash, nor were his owners even trying to use voice-command to control his behavior.

Corr. ID: 2307 **Organization:** *Not Specified*
Comment ID: 200623 **Organization Type:** Unaffiliated Individual
Representative Quote: I've seen dogs urinate in public playgrounds intended for children, while their owners looked on with amusement. Evidently, they thought it was funny. I think this is quite symptomatic of these people's mindset and attitude to others.

Response: 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.

HS4015 – HEALTH AND SAFETY: IMPACTS OF DOG RELATED INCIDENTS

Concern ID: 29746
CONCERN STATEMENT: [Some commenters noted that dogfights have resulted in injuries and even death to dogs at the park, as well as injuries to the owners, while other commenters mentioned that incidents between dogs are extremely rare, and are not serious when they occur.](#)

Representative Quote(s): **Corr. ID:** 3695 **Organization:** *Not Specified*
Comment ID: 204233 **Organization Type:** Unaffiliated Individual
Representative Quote: I've seen numerous dog attacks, (dog vs. dog) and also many frightened people, including myself, when dogs have charged, barked, and basically threatened people for whatever reason dogs do that. I hate going anywhere that there are no leash laws, especially in a public area. Fort Funston is also a tourist area, and it's just bad news when you have 100+ dogs running openly in a parking lot/visitor area. I would suggest a leash law in the parking lot and visitor area, and off leash for the beach and surrounding open space areas.

Corr. ID: 3715 **Organization:** *Not Specified*
Comment ID: 202267 **Organization Type:** Unaffiliated Individual
Representative Quote: Interestingly, it could very well be that the safest dogs are those that attend off-leash dog parks. Shyan and cohorts published a research paper in 2003 in the Journal of Applied Animal Welfare Science, which looked at the prevalence of inter-dog aggression in dog parks. Dog to dog problems turned out to be minimal and of a non-serious nature. While the paper did not consider the question of dog-to-human aggression, the obvious interpretation of this low incidence of aggression was interesting and I think very relevant. They suggested that self-selection operates strongly, i.e., people who take their time to get into their car or walk to a designated off-leash area to exercise their dog tend to not to be the type

who are derelict in other areas of dog guardianship, such as training, socialization or appropriate containment.

As is clear from all of this, the chance of being bitten in a park by a strange dog that you have not interacted with is pretty slim.

Corr. ID: 4277 **Organization:** *Not Specified*
Comment ID: 209082 **Organization Type:** Unaffiliated Individual
Representative Quote: This is the second time in two years that I have been subjected to violence from off-leash dogs in the Presidio. Two years ago, I was walking our family dog ON A LEASH in the Presidio. Our dog was a 17 pound mutt which looked like a miniature golden retriever. She was smelling some flowers when she was attacked, out of the blue, by an off-leash Akita. I watched my animal get torn to bits by this vicious Akita. The Akita's owner happened onto the scene some moments into the attack and it took her a great deal of time, beating and screaming at her own dog before the Akita could be pulled off. We both sustained bite wounds trying to save my dog. The owner mentioned that she was surprised that the Akita attacked because the Akita hadn't attacked anyone for at least a year. (!!)"We have tried to train her to use her `soft mouth' "she told me. I rushed our dog to the veterinarian where emergency surgery was performed. Although the Akita's owner paid the vet bills, our pet never recovered and died a few months later.

When I tried to report this incident to the Presidio Police, they referred me to San Francisco Animal Control. San Francisco Animal Control insisted it was not their jurisdiction. Both agencies pointed the finger at each other and ultimately, nothing happened! The only thing that happened is that a dangerous, vicious Akita undoubtedly still runs off-leash in the Presidio.

Corr. ID: 4321 **Organization:** *Not Specified*
Comment ID: 209439 **Organization Type:** Unaffiliated Individual
Representative Quote: And with all the thousands of how's we have spent there over last 5 years, we have seen exactly two serious dog vs. dog altercations, and zero involving, a dog and a person.

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.

Concern ID: 29749
CONCERN STATEMENT: [Off-leash dogs pose a threat to horses utilizing the trails. They are often aggressive towards the horses, which can spook the horses, and result in injuries to riders, horses, and dogs. Dogs also present a substantial risk to bikers, hang-gliders, and other recreational user groups.](#)

Representative Quote(s): **Corr. ID:** 431 **Organization:** GG Parks Conservancy
Comment ID: 181621 **Organization Type:** Unaffiliated Individual
Representative Quote: Unleashed dogs present a substantial danger to bikers - I hardly know anyone who rides a bike who doesn't have a negative dog story to tell.

Corr. ID: 1429 **Organization:** Fellow Feathers of Fort Funston
Comment ID: 195371 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a five year member and prior club officer of FF of Fort Funston. Over those five years I have witnessed numerous negative encounters between park patrons due to dogs being off leash. I have witnessed pilots being bitten by such dogs while attempting to land. I have personally been chased numerous times by dogs trying to catch my glider, putting my landings at risk. I have contacted park police because one patron became outwardly violent towards a dog owner he thought was not properly controlling her animal.

Corr. ID: 2179 **Organization:** Equestrian
Comment ID: 200636 **Organization Type:** Unaffiliated Individual
Representative Quote: My horse and I have been attacked by off leash dogs numerous times down on the beach below Fort Funston, once the police were involved as well as Chris Powell/GGNRA. One of the incidents, left my horse with numerous bites from an unleashed pit-bull, and a dog with a broken jaw - not the ending any animal owner wants. There have been other incidents such as these involving other equestrians, too many to count anymore.

Corr. ID: 2317 **Organization:** *Not Specified*
Comment ID: 195275 **Organization Type:** Unaffiliated Individual
Representative Quote: I used to love to hike all over the GGNRA but have stopped because of the irresponsibility of too many dog owners. I've had huge, unleashed dogs run up to me and the owners threaten me when I yell, "Control your dog!". A friend was bitten while riding her bike.(The owner put the dog on leash briefly and then released it again) Another friend was bitten while hiking. Three people I know have had their small dogs bitten by other dogs (one of the dogs died and another almost did). Once, when visiting the Pacifica Pier, I had to cross the street to avoid a man who was allowing his dog to lunge and bark at people.

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.

HV1300 – HOMESTEAD VALLEY: DESIRE OTHER ALTERNATIVE

Concern ID: 29296
CONCERN STATEMENT: Commenters support alternative A for Homestead Valley because it allows off-leash access in this area.

Representative Quote(s): **Corr. ID:** 476 **Organization:** *Not Specified*
Comment ID: 181777 **Organization Type:** Unaffiliated Individual
Representative Quote: The places that are available offer wonderful opportunities for personal health and wellbeing for both dog owners and non-dog owners.

I urge you to not change the rules and regulations in Marin County and keep the access as outlined in Alternative A (the current situation) in this area.

Corr. ID: 4414 **Organization:** Paws in Motion/Marin Pet Care Association

Comment ID: 207131 **Organization Type:** Business
Representative Quote: I recommend keeping the rules for Homestead Valley as they currently are and changing the GGNRA preferred choice for Homestead Valley to Alternative A, No Action

Corr. ID: 4626 **Organization:** Marin Unleashed
Comment ID: 264273 **Organization Type:** Non-Governmental
Representative Quote: Retain the 1979 Pet Policy (Alternative A) in the following areas:
Homestead Valley, Julian Fire Road between Mc Cullough Road

Response: Alternative A was not selected as the preferred alternative for the protection of native plant communities, wildlife and wildlife habitat, and the preferred alternative does not include off-leash dog walking. Please see chapter 2, Preferred Alternative for Homestead Valley for additional rationale for the selection of the preferred alternative.

Concern ID: 29298
CONCERN STATEMENT: Commenters support alternative D for Homestead Valley because it is most protective of natural resources and visitor safety.

For additional representative quotes, please see Concern 29230 (MH1300), Comment 205586.

Representative Quote(s): **Corr. ID:** 1473 **Organization:** Marin Audubon
Comment ID: 200259 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternative D: Muir Beach, Fort Baker, Homestead Valley, Alta Trail and Orchard and Pacheco Fire Roads, Oakwood Valley, Marin Headlands Trail

Corr. ID: 4307 **Organization:** *Not Specified*
Comment ID: 209347 **Organization Type:** Unaffiliated Individual
Representative Quote: Regarding the dog management issue I support Alternative D for all of the sites in the GGNRA. I frequent all of the sites and live near the Homestead Valley and Oakwood Valley areas. I feel strongly that on-leash dogs be allowed only on the fire roads in these areas.

I have witnessed damage to plants and land by dogs. Our natural resources need protection.

Response: Alternative D was not selected as the preferred alternative for Homestead Valley. The preferred alternative, restricting dog walking to on-leash on the trails and fire road, would continue to protect native plant communities, wildlife and wildlife habitat throughout the site. Please see chapter 2, Preferred Alternative for Homestead Valley for additional rationale.

HV1400 – HOMESTEAD VALLEY: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29295
CONCERN STATEMENT: Commenters suggest in addition to alternative A, limiting the number of dogs under voice control to 6 per dog walker at Homestead Valley.

Representative Quote(s): **Corr. ID:** 4414 **Organization:** Paws in Motion/Marin Pet Care Association
Comment ID: 207135 **Organization Type:** Business
Representative Quote: If you feel that more regulation than Alternative A, No Action, is needed, I would recommend limiting the number of dogs under voice control to 6 per dog walker throughout the site [Homestead Valley].

Response: Alternative A was not selected as the preferred alternative for Homestead Valley due to the need for protection of native plant communities, wildlife and wildlife habitat. Dogs under voice control would not be permitted, nor would permits to walk more than 3 dogs - with a maximum of 6 - be issued to commercial or individual dog walkers at this site. Please see chapter 2, Preferred Alternative for Homestead Valley for additional rationale.

Concern ID: 31549
CONCERN STATEMENT: An alternative is needed that better separates the site, allowing for off-leash dog walking, but also not promoting access to Homestead through the adjacent community.

Representative Quote(s): **Corr. ID:** 4687 **Organization:** County of Marin Dept. of Parks and Open Space
Comment ID: 227453 **Organization Type:** Non-Governmental
Representative Quote: Homestead Valley is a popular dog walking area. The county has received comments supporting off leash use in the valley. Others who are residents of the valley fear that they will become a destination for dogs displaced from other newly restricted areas. The county requests that both entities' staff examine an additional way to segment the valley to accommodate some off leash use without inviting new out-of-community access through the community.

Response: Off-leash dog walking would not be permitted at Homestead Valley due to the need for protection of native plant communities, wildlife and wildlife habitat. Although the trails on at Homestead connect to the neighborhood trail system, trailheads would not be established on non-NPS lands. Please see chapter 2, Preferred Alternative for Homestead Valley for additional rationale.

LE1300 – LANDS END: DESIRE OTHER ALTERNATIVE

Concern ID: 29315
CONCERN STATEMENT: Commenters had witnessed several safety issues relating to dogs and dog walkers on the Coastal Trail, and felt that the terrain and heavy use of the trail by other visitors make it better suited for alternative D.

Representative Quote(s): **Corr. ID:** 4463 **Organization:** *Not Specified*
Comment ID: 208631 **Organization Type:** Unaffiliated Individual
Representative Quote: have lived in the Outer Richmond for 4 years now and am a regular visitor to Lands End. I am writing because I have been in (and witnessed) numerous dangerous situations with dogs and their owners while walking the Coastal trail and I fear it is only a matter of time before someone is seriously injured. This trail is heavily used by joggers, tourists and hikers of all ages. In several parts, the trail is narrow, uneven, steep and bordered by cliffs. There are blind corners, tight turns and several stair cases. When dogs both leashed and unleashed are being led through these sections, it creates serious congestion and apprehension for the parties involved, as well as the potential for serious injury. Alternative D is the best proposal, because it does not allow dogs in the above-mentioned areas

Response: Alternative D was not selected as the preferred alternative for this site, however dog walking would be restricted to on-leash on the Coastal Trail. Please see chapter 2, Preferred Alternative for Lands End for additional rationale.

Concern ID: 29316
CONCERN STATEMENT: Commenters prefer alternative A. The availability of off-leash dog walking should not be restricted from the current regulations at Lands End. Restricting these areas would limit the recreational opportunities of those who enjoy having their dogs at the park.

Representative Quote(s): **Corr. ID:** 4651 **Organization:** *Not Specified*
Comment ID: 209008 **Organization Type:** Unaffiliated Individual
Representative Quote: Because we have a dog, we have begun to enjoy the GGNRA (even areas with no off-leash access like Sweeney Ridge). We urge you to protect the access dogs have in Funston, Ocean Beach, and Lands End. 'There should be no net reduction in those areas. I don't see how our family's recreation ' or that of the many other users we meet there ' can be served by further limiting dog access.

I believe that you serve the city, the peninsula, and much of the greater bay area by continuing to maintain the current freedom that dogs and owners have in those parks (and would make things even better for all by enforcing the restrictions at Ocean Beach). I understand that the challenges at Crissy Field are complicated and wish you the best in resolving them.

Response: Alternative A was not selected as the preferred alternative for Lands End due to safety concerns related to off-leash dog walking on heavily used trails. Please see chapter 2, Preferred Alternative for Lands End for additional rationale.

LE1400 – LANDS END: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29317
CONCERN STATEMENT: Commenters desired the preferred alternative, but with several changes, including the removal of commercial dog walking, a limit of one dog per visitor, a compliance-based management rate of 95% or higher, and the implementation of an easy system to report violations.

Representative Quote(s): **Corr. ID:** 4584 **Organization:** *Not Specified*
Comment ID: 210011 **Organization Type:** Unaffiliated Individual
Representative Quote: Lands End ' I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Response: Lands End is not one of the areas where permits would be issued for commercial or individuals who want to walk more than 3 dogs (up to 6). Commercial dog walkers will be able to use the area under the preferred alternative, but they will be limited to 3 dogs, the same as individual dog walkers. The monitoring-based management strategy (MMS) (formerly the compliance-based management strategy) has been revised based on comments received in the public comment period. Changes to the MMS have been made in chapters 2 and 4 of the draft plan/SEIS.

Concern ID: 29318
CONCERN STATEMENT: Enforcement - The use of strong fines for owners who do not follow rules would be a better solution to managing dogs at Lands End.

Representative Quote(s): **Corr. ID:** 3101 **Organization:** *Not Specified*
Comment ID: 201498 **Organization Type:** Unaffiliated Individual
Representative Quote: I currently enjoy the areas of Lands End and Sutro Heights on a daily basis and periodically like to visit most of the other attractions in the GGNRA.
I feel the preferred alternative of the GGNRA DEIS is overly restrictive. I have seen dogs off leash in many parts of the GGNRA and like people they are mostly well behaved. If dogs are flushing birds, chasing animals, digging up plants, harassing pedestrians or fighting, their owners should be issued a hefty fine. If dog owners don't have their dogs under voice command or don't pick up the litter, they should be issued a hefty fine.

Response: Fines for dog walking violations are not determined by the National Park Service. These fines were established in the 2010 Federal Magistrate Bail Schedule, which is set by the court system. Fines have been previously increased for repeat offenders. GGNRA will work with the Federal Magistrate to increase fines related to dog walking violations as appropriate in the future.

Concern ID: 29320
CONCERN STATEMENT: Commenters made several suggestions about division of land use, and dog access at Lands End. Some commenters suggested adding more off-leash

dog walking, particularly along the Coastal and Camino del Mar trails. Alternately, some commenters believed that dogs should be banned entirely from the site to protect visitors who do not like dogs, and wildlife. Other commenters suggested having on-leash dog walking in parking lots and paved portions of the Coastal Trail.

Representative Quote(s): **Corr. ID:** 124 **Organization:** *Not Specified*
Comment ID: 182009 **Organization Type:** Unaffiliated Individual
Representative Quote: I have nothing against pets except when they are not leashed. I feel threatened when the pets are not on leash. I prefer that pets are prohibited at Lands End.

Corr. ID: 417 **Organization:** *Not Specified*
Comment ID: 181589 **Organization Type:** Unaffiliated Individual
Representative Quote: Lands End (proposed Alternative B): Proposed on-leash in all areas. Lands End is a disappointment... whereas for many parks, the proposal limits dog access for conservation reason, at Lands End it limits dog access in interest of developing/destroying what was once wildlife habitat. This is against the GGNRA's mission for many parks, which seems a conflict. Ideally, development would cease in favor of maintaining what's left of wildlife area (ie: in favor of conservation). Where the Coastal Trail becomes a dirt path, dogs should be allowed off-leash, as well as on all other minor trails (down the cliff, toward the beach).

Corr. ID: 417 **Organization:** *Not Specified*
Comment ID: 220168 **Organization Type:** Unaffiliated Individual
Representative Quote: Lands End - However, since development surely won't cease, I suggest requiring dogs to be on leash in the parking lot and the Coastal Trail starting at Sutro Baths/Sutro Heights Park through the currently developed/paved portion of the Coastal Trail.

Corr. ID: 2105 **Organization:** *Not Specified*
Comment ID: 193361 **Organization Type:** Unaffiliated Individual
Representative Quote: Lands End should be closed to dogs and restored to its natural state -as a nesting area for migratory birds.

Response: The preferred alternative would allow on-leash dog walking on the Camino del Mar and Coastal Trails, and a no-dog experience in the area of Lands End near Sutro Baths. No ROLAs would be established at the site due to visitor safety. 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 ID: 29765
CONCERN STATEMENT: There is a concern that if off-leash dog walking is allowed at GGNRA then visitors may demand it at other National Parks. GGNRA should be managed like the other National Parks in regard to dog walking. Natural and cultural resources should be the focus of future policies at GGNRA; the

park's mission is to protect these resources, not allow recreation to undermine them. GGNRA should keep dog walking rules consistent across all national parks.

Representative Quote(s): **Corr. ID:** 521 **Organization:** *Not Specified*
Comment ID: 181940 **Organization Type:** Unaffiliated Individual
Representative Quote: One other concern: if dog people are allowed free rein in GGNRA, then they will begin to demand it in all the other national parks. It also opens the way for other special interests to demand their so called "rights" to these national treasures, such as off road vehicles, jet skiers, etc.

Corr. ID: 952 **Organization:** *Not Specified*
Comment ID: 191554 **Organization Type:** Unaffiliated Individual
Representative Quote: How can you possibly justify eliminating dogs because it is a 'national park' but keep having fun runs, swims, regattas...all of which bring in people who have no respect for the park or any kind of environmental aspect to anything. It's incredibly hypocritical, and just shows that you have an agenda against dogs....not an agenda to save the environment or provide a pleasant national park experience. If you would ban these events, which I would think are probably frowned upon in a national park, then maybe I would believe that you care about the environment. I don't see Yosemite telling thousands of runners to come over for a 'fun run' up to half dome. Isn't that how you are trying to sell this? That you need to manage these parks like the rest of the parks?

Corr. ID: 3418 **Organization:** Golden Gate Audubon Society
Comment ID: 201409 **Organization Type:** Unaffiliated Individual
Representative Quote: Endangered species wildlife habitat deserves the highest level of protection from human and pet disturbance. Other national parks do not allow dogs to be off-leash and all beach areas should be free from dog recreation to protect birds.

GGNRA is on the Pacific flyway and exhausted and hungry birds need this sanctuary.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

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.

Concern ID: 29766
CONCERN STATEMENT: [Off-leash dog walking should be permitted in other National Parks;](#)
[GGNRA can be a model for other parks. If off-leash dog hunting is allowed](#)

in other National Parks then off-leash dog walking should be allowed at GGNRA.

Representative Quote(s): **Corr. ID:** 651 **Organization:** Golden Gate Audubon
Comment ID: 182579 **Organization Type:** Unaffiliated Individual
Representative Quote: What is permitted in GGNRA should be permitted in all National Parks, and so more dogs will be off-leash in Yosemite and other parks and monuments.

Corr. ID: 1334 **Organization:** *Not Specified*
Comment ID: 195100 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs are allowed off-leash to hunt in national preserves, and other units administered by the National Park Service. Surely, if it's okay for a dog to be off-leash while it helps chase, corner and kill a wild animal, it should be okay for a dog in the GGNRA to be off-leash to play with people and other dogs.

Corr. ID: 1957 **Organization:** *Not Specified*
Comment ID: 192711 **Organization Type:** Unaffiliated Individual
Representative Quote: Instead of further restricting dogs in the GGNRA, why isn't the Nat'l Park Service looking into what is right with the current GGNRA dog policy, and expanding these off leash areas throughout the rest of the Nat'l Parks?

Fort Funston, Chrissy Field, and the other off leash areas throughout the GGNRA should be reclassified as a new type of Nat'l park in which this pilot is a complete success!

Response: See response for the above concern statement 29765. A discussion of regulations regarding other national park units can be found in chapter 1, particularly in the "National Park Service Organic Act and Management Policies" section.

Concern ID: 29767
CONCERN STATEMENT: The restrictions in the plan will affect the regulations in city parks causing more dog walking restrictions. Overriding the 1979 Pet Policy is a breach of contract and will result in public distrust of the GGNRA management. Off-leash dog walking was part of the agreement with the City of San Francisco when park land was transferred to GGNRA.

Representative Quote(s): **Corr. ID:** 1259 **Organization:** *Not Specified*
Comment ID: 194959 **Organization Type:** Unaffiliated Individual
Representative Quote: With all due respect, I take issue with one of the main arguments used for reducing off-leash and leashed dog walking, which is: "it is inconsistent with NPS regulations." In 1978, the GGNRA took the position that "the ordinary guidelines outlined in the Code of Federal Regulations do not really apply in an urban area," and that "people and their animals have been visiting the park for too long to apply an all-inclusive arbitrary policy." Based on that position, the GGNRA, with a great deal of public input, drafted what is now known as the 1979 Pet Policy, which maintains the right for recreation with off-leash dogs at Fort

Funston, Ocean Beach, Fort Miley, Baker Beach, Lands End, and Crissy Field. It seems to me that overriding the 1979 Pet Policy is a breach of contract and will result in public distrust of the GGNRA management and leaders.

Corr. ID: 1435 **Organization:** Golden Gate Mothers Group
Comment ID: 195625 **Organization Type:** Unaffiliated Individual
Representative Quote: Just to make the rules the same as other parks? GGNRA is NOT other parks. It is my understanding that free dog areas where part of the agreement that transferred the land to the GGNRA. Why renig on the deal?

Corr. ID: 1831 **Organization:** W3 Partners
Comment ID: 191965 **Organization Type:** Unaffiliated Individual
Representative Quote: I completely oppose the changes that either require dogs to be leashed or prohibited from being on public lands. With open space, beaches, parks and trails being overly restrictive already for dog owners/dogs, if this is allowed to pass it will only get more restrictive and before you know it, we won't even be able to walk our dogs down public sidewalks!

Response:

Chapter 1 lays out the history and policies regarding the 1979 Pet Policy in the section entitled "Golden Gate National Recreation Area Citizens' Advisory Commission and the 1979 Pet Policy." Also included in chapter 1 under the section titled "Land Use Prior to Park Acquisition" is a discussion regarding the 1975 agreement for the lands transfer from the City of San Francisco to the NPS. The deeds for the transferred lands state that: "To hold only so long as said real property is preserved and used for recreation and park purposes." This document includes no additional specificity as to what uses constituted recreation.

Concern ID:
CONCERN
STATEMENT:

29769
Commenters feel that the budget for the preferred alternative should be spent on enforcing existing established rules (i.e., not picking up pet waste, chasing birds).

Representative Quote(s):

Corr. ID: 2943 **Organization:** *Not Specified*
Comment ID: 202414 **Organization Type:** Unaffiliated Individual
Representative Quote: Finally, the level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use of GGNRA resources. The DEIS states that it will cost nearly \$1million to enforce the Preferred Alternative, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could more easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs.

Response:

The budget for the preferred alternative will focus on education, monitoring, and enforcement, which are all NPS-defined management duties. It is important to note that the no action alternative (alternative A) does not meet all of the purpose, need, and objectives of the plan/EIS. Alternative E includes as much of alternative A as possible and would provide the greatest level of access for dog walkers throughout GGNRA while still meeting the purpose, need, and objectives of the draft plan/SEIS and assuming compliance. Compared to alternative A, alternative E includes additional education and enforcement while assuming compliance with regulations.

LU1000 – LAND USE: POLICIES AND HISTORICAL USE

Concern ID:

29847

**CONCERN
STATEMENT:**

Some commenters were of the opinion that NPS needs to consider the historical use of the land in reference to dog walking. Dog walking has been happening on this land for several decades, and there is no reason to prevent it from continuing in the future. Other commenters believed that contrary to this, although off-leash dog walking may have occurred in the GGNRA historically, this does not mean that it should be continued in the future. Environmental impacts should be assessed.

Representative Quote(s):

Corr. ID: 88

Organization: *Not Specified*

Comment ID: 181902 **Organization Type:** Unaffiliated Individual

Representative Quote: I fully support conservation efforts but I also think it is necessary to recognize the fact that a large portion of the land in question has been used for a number of years as dog accessible land. I would like to request that the competing demands to conserve the land be balanced with the need to maintain the availability of dog accessible land.

Corr. ID: 807

Organization: *Not Specified*

Comment ID: 186049 **Organization Type:** Unaffiliated Individual

Representative Quote: I oppose strongly the proposed changes to off leash dog activities at Fort Funston and other areas in San Francisco. Off leash dog access should be increased, not restricted. Time and again the courts have ruled against the GGNRA's manipulation of rules requiring off-leash dog activity. Restricting access for off-leash dogs also violates the original agreement when Fort Funston and other lands in San Francisco were given to what is now the GGNRA.

Corr. ID: 1850

Organization: *Not Specified*

Comment ID: 192032 **Organization Type:** Unaffiliated Individual

Representative Quote: As the DEIS states on p. ii of the Executive Summary, the lands of the GGNRA have a long tradition of dog walking, including off leash dog walking, which predates the formation of the GGNRA by decades. Dog walking is an historic, scenic and recreational value for many generations of residents who have walked dogs in these lands; enjoyed seeing their dogs at play in the GGNRA; and experienced delight in playing with a dog at the beach; having the companionship of a dog on the trails, and enjoying other forms of recreation at the GGNRA with dogs. The DEIS fails to consider fully the historic, scenic and

recreational values of dog walking. The DEIS also fails to look at a "national park experience" as meaning something other than an all dogs on leash all the time in as few areas as possible. The DEIS should be revised to put appropriate emphasis on preserving the traditional values of dog walking at GGNRA and to look beyond the standard NPS dog policy for the meaning of a "national park experience."

Corr. ID: 2314 **Organization:** *Not Specified*
Comment ID: 195288 **Organization Type:** Unaffiliated Individual
Representative Quote: 5. The fact that off-leash dogs have "traditionally" occupied many areas of GGNRA (Ocean Beach, Chrissy Field) does not imply that this tradition must continue. Such customs have to be constantly reevaluated in the light of new information about dog impacts on people and wildlife. The increasing numbers of dogs using these areas, for example, is in itself enough reason to reevaluate such practices.

Corr. ID: 4312 **Organization:** *Not Specified*
Comment ID: 209364 **Organization Type:** Unaffiliated Individual
Representative Quote: The GGNRA post-dates the urbanization of the Bay Area, and is in many cases immediately adjacent to areas that were densely populated well before the GGNRA was created. For this reason, I feel that the historic usage of GGNRA land adjacent to these populated areas should be taken into consideration when formulating the dog management plan. It seems to me that the goal of the plan should be to protect the GGNRA lands as they now stand, but not attempt to turn back the clock to when the adjacent lands were rural and the GGNRA did not exist.

Response:

Historic dog walking at GGNRA lands is discussed in the "Land Use Prior to Park Acquisition" section of chapter 1. The deeds for the lands transferred from the City to the NPS state that: "To hold only so long as said real property is preserved and used for recreation and park purposes." These documents include no additional specificity as to what uses constituted recreation. Further, there are numerous impacts to natural resources, visitor use and experience, and health and safety, among others, associated with the no action alternative (alternative A) as described in the draft plan/SEIS. Major objectives of the draft plan/SEIS are: to preserve and protect natural and cultural resources and natural processes; to improve visitor and employee safety and reduce user conflicts.

Concern ID:
CONCERN
STATEMENT:

29851
The 1979 legislation deeded the land to NPS from the city with the purpose of continuing recreational uses, and preventing development. Dog walking, including off-leash dog walking, was considered one of these recreational uses. To restrict dog walking goes against the intended purpose of the GGNRA. Commenters suggest that the city has the right to revoke the deed to GGNRA if the terms of the compact are not met, and that any option that does not maintain the 1979 policies should be subject to civil action. Many commenters expressed that they feel the city should take back the land if the proposed alternatives were put in place.

Representative Quote(s): **Corr. ID:** 860 **Organization:** *Not Specified*
Comment ID: 186255 **Organization Type:** Unaffiliated Individual
Representative Quote: To decrease the size of the off-leash area is just unfair! The new plan severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA.

Corr. ID: 1394 **Organization:** *Not Specified*
Comment ID: 195341 **Organization Type:** Unaffiliated Individual
Representative Quote: Please consider the proven history of dogs coexisting with other activities and wildlife in the GGNRA for the past several decades and continue to let our parks be used as intended!

Specifically, I understand that Congress could resolve this conflict by codifying the GGNRA's 1979 Pet Policy as a Section Seven Special Regulation, and mandating that all properties added to the GGNRA after 1979 maintain historical recreational access.

Corr. ID: 1624 **Organization:** *Not Specified*
Comment ID: 190923 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston was given to the GGNRA by the City of San Francisco on the condition that its traditional uses, including walking dogs without leashes, playing fetch, etc. would be allowed to continue. Dogs can run off leash in only 1% of the GGNRA. Please do not take that away. There is still 99% for wildlife, birds, people who don't like dogs etc.

Corr. ID: 1770 **Organization:** *Not Specified*
Comment ID: 191529 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston was placed under the purview of the GGNRA with the condition that it be maintained for the enjoyment of dogs and horses. The GGNRA has a legal obligation to honor this condition or return the land to the city

Corr. ID: 1875 **Organization:** *Not Specified*
Comment ID: 200355 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly oppose the severe reduction in space allocated for recreation with dogs in the GGNRA. The land was given with the understanding that it would continue to be a recreation area. The other parks in the city would be overwhelmed by dogs if this plan passes. I think the land should be given back to the city if the scope of use is changed in this way. I think that there can be balance where dog owners and non dog owners can all enjoy the GGNRA.

Corr. ID: 3993 **Organization:** *Not Specified*
Comment ID: 207426 **Organization Type:** Unaffiliated Individual
Representative Quote: In all that time my dog has never had a negative environmental impact, nor has any of my dogs ever had a negative exchange with another living creature, including wildlife, other pets, or

human beings.

Having said all that, I also absolutely believe that a "National Park" in a densely populated urban environment is different from a park in a pristine wilderness such as Yosemite or Yellowstone.

Much of the GGNRA land in question was deeded to the NPS by the City of San Francisco in good faith with the stipulation that traditional recreational uses be preserved. The Park Service has acted in bad faith by slowly chipping away at off-leash recreation in Fort Funston and Ocean Beach. The City of San Francisco is within its rights to rescind the gift of these areas, and if you proceed with restricting off-leash recreation in these areas, please be prepared for the City to do just that, because the dog owning community is a HUGE percentage of the SF population, and we are well-heeled and well-organized.

Response:

Chapter 1 lays out the history and policies regarding the 1979 Pet Policy in the section entitled "Golden Gate National Recreation Area Citizens' Advisory Commission and the 1979 Pet Policy". Also included in chapter 1 under the section titled "Land Use Prior to Park Acquisition" is a discussion regarding the 1975 agreement for the lands transfer from the City of San Francisco to the NPS. The agreement outlining the transfer of City of San Francisco lands to the NPS states that: "The NPS, acting through the General Superintendent, agrees to utilize the resources of GGNRA in a manner that will provide for recreational and educational opportunities, consistent with sound principles of land use, planning and management, to preserve the GGNRA in its natural setting and protect it from development and uses which would destroy the scenic beauty and character of the area, and to maintain the transferred premises in good and slightly condition" The deeds for the transferred lands state that: "To hold only so long as said real property is preserved and used for recreation and park purposes." Neither the deeds nor the agreement contain any additional specificity as to what uses constituted recreation.

LU2000 – OTHER AGENCIES POLICIES AND MANDATES REGARDING DOG MANAGEMENT

Concern ID:

29706

CONCERN

STATEMENT:

Commenters felt that the GGNRA needed to work more closely with the city on dog management issues to establish more off-leash dog walking opportunities. Commenters also believed GGNRA should be coordinating management policies with agencies that manage trails and roads to create a connecting network of trails for all user groups.

Representative Quote(s): **Corr. ID:** 1958

Organization: *Not Specified*

Comment ID: 192714 **Organization Type:** Unaffiliated Individual

Representative Quote: Concern: How is the Park Service co-ordinating with/cooperating with SF City Government?

Corr. ID: 2149 **Organization:** *Not Specified*
Comment ID: 193447 **Organization Type:** Unaffiliated Individual
Representative Quote: It is important that there be consistency between and amongst all the several agencies on road and trail use policies and standards because of the existence of a network of inter-connected roads + trails that are used by all sorts of users

Corr. ID: 4213 **Organization:** California State Senate
Comment ID: 208875 **Organization Type:** State Government
Representative Quote: 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.

Response: The relationships between GGNRA and the city and GGNRA and the policies of various agencies regarding dog management issues has been added to the plan/EIS, and is outlined in chapter 1.

LU3000 – LAND USE: DOG PARKS PROVIDED BY SAN FRANCISCO AND OTHER MUNICIPALITIES

Concern ID: 29824
CONCERN STATEMENT: Commenters have stated that there are plenty of alternative off-leash dog walking parks in the city. Almost all the fire roads within the open space of district parks are open to off-leash dog walking. Many of the dog parks of San Francisco are underutilized - signage is poor at some parks resulting in under-use. There are hundreds of acres available throughout the San Francisco City Park system available for dogs, but only the National Parks can provide the best protection of flora and fauna. National Parks should not have to provide dog parks for local residents or areas for commercial walkers.

Representative Quote(s): **Corr. ID:** 223 **Organization:** *Not Specified*
Comment ID: 180699 **Organization Type:** Unaffiliated Individual
Representative Quote: There are already too many parks that don't allow dogs to be off leash. Let us keep the ones we have.

Corr. ID: 251 **Organization:** *Not Specified*
Comment ID: 180831 **Organization Type:** Unaffiliated Individual
Representative Quote: By restricting the off-leash dog areas to such small portions of this outdoor space, when the legal places to have dogs off leash is already extremely restricted in San Francisco, you will just make those

few places so incredibly crowded and they will no longer be enjoyable locations to visit

Corr. ID: 4567

Organization: *Not Specified*

Comment ID: 209916 **Organization Type:** Unaffiliated Individual

Representative Quote: With regards to the Adjacent Parks section, the Remington Dog Park has a limit of 3 dogs per dog walker, so this is not a viable alternative to the GGNRA land and should not be even be mentioned. No dog park should be listed as an alternative adjacent park, since you cannot take dogs hiking in a dog park. Many of the 26 parks within a 5-mile radius listed are small neighborhood parks with leash laws and playgrounds full of toddlers. It is misleading to list them as alternatives to GGNRA. The only viable alternative is Marin County Open Space. These areas cannot accommodate all the dog walkers currently walking on GGNRA land without becoming overcrowded. In summary, changing the fire roads from Marin City to Oakwood Valley to leash-only access will have a huge detrimental impact on other hiking areas in the county especially in Southern Marin.

Response:

Adjacent dog parks available for visitor use can be found within the discussion of impacts for resources in chapter 4. The results of the visitor survey regarding the potential for displacement as a result of implementation of the GGNRA dog management plan and regulation have been added to the plan/EIS, and issues with accessibility or restrictions at adjacent parks identified by commenters have been corrected. The draft plan/SEIS allows 3 dogs per dog walker, whether commercial or private; all dog walkers, both commercial and private, can apply for a permit to have up to 6 dogs; those permits would be issued for 7 GGNRA ROLAs. The proposed limit per dog walker in the GGNRA draft plan/SEIS is consistent with most other land management agencies in the Bay Area.

Concern ID:

29829

**CONCERN
STATEMENT:**

Commenters have stated that there are plenty of alternative off-leash dog walking parks in the city. Almost all the fire roads within the open space of district parks are open to off-leash dog walking. Many of the dog parks of San Francisco are underutilized - signage is poor at some parks resulting in under use. There are hundreds of acres available throughout the San Francisco City Park system available for dogs, but only the National Parks can provide the best protection of flora and fauna. National Parks should not have to provide dog parks for local residents or areas for commercial walkers.

Representative Quote(s): **Corr. ID:** 1684

Organization: *Not Specified*

Comment ID: 191083 **Organization Type:** Unaffiliated Individual

Representative Quote: 2) GGNRA is actually being generous in providing ANY off-leash dog areas at all. Most national parks do not do this.

3) There are AMPLE other off-leash areas in Marin & SF & the East Bay, e.g. almost ALL the fire roads within open space district parks. And there are numerous dog parks everywhere. I feel the combination of these & areas

provided by GGNRA provide more than enough choices/variety for any dog owner

Corr. ID: 2194 **Organization:** University of Louisville
Comment ID: 200690 **Organization Type:** Unaffiliated Individual
Representative Quote: There are hundreds of acres available throughout the S.F. city park system available for dogs to play in, but only the National Parks have the purview of restoring native flora and fauna. Please limit the destructive potential of visiting dogs, by requiring dog owners to be just as responsible as they claim to be. Modern leashes still provide plenty of mobility, and it's not worth sacrificing the park's biodiversity, nor the hard work of the park employees and volunteers.

Corr. ID: 2621 **Organization:** NPCA
Comment ID: 195478 **Organization Type:** Unaffiliated Individual
Representative Quote: San Francisco, and in fact most of the North and South Bay areas, have some of the most liberal dog-friendly facilities in the country. This means, in short, that there are plenty of places for dogs to run off leash dog parks to play in and areas to hike and walk on leash.

Response: Adjacent dog parks available for visitor use can be found within the discussion of impacts for resources in chapter 4.

Concern ID: 31269
CONCERN STATEMENT: [These policies are the result of the impact of other agencies restricting dog use, which has caused the GGNRA to protect itself from the influx of visitors from areas where dog walking has been restricted.](#)

Representative Quote(s): **Corr. ID:** 547 **Organization:** *Not Specified*
Comment ID: 181994 **Organization Type:** Unaffiliated Individual
Representative Quote: In part I see this document the result of the lack of regional management. That is, as more and more agencies listen to their lawyers and restrict dog use, less and less land is available for the walking of dogs. So, now GGNRA must protect itself as more and more people have been finding the only 'freedom' to be had is on certain GGNRA lands, that they in fact own (in a manner of speaking).

Response: The purpose and need for the plan is discussed in chapter 1, under the "Purpose and Need for Taking Action" section.

Concern ID: 31605
CONCERN STATEMENT: [Commenters noted that although there is a lot of acreage provided for dog walking in the area, there are also more dogs, and requested that this relationship be further studied.](#)

Representative Quote(s): **Corr. ID:** 4702 **Organization:** *Not Specified*
Comment ID: 227481 **Organization Type:** Unaffiliated Individual
Representative Quote: [Comment was originally presented at BOS committee hearing 4-11-11 by Ilana Minkoff]

At any rate, I am also curious to know ' it's been said many times today ' that our city has more acreage than any other city, for dogs ' how many more dogs do we have than all these other cities combined as well? That would be my big question, so if you could please research this issue thoroughly and support the resolution to oppose the GGNRA, both Lucy and I would really appreciate it.

Response:

NPS completed a survey to better understand where dog walkers would go with their dogs if the GGNRA restrictions were enacted. This information has been added to the draft plan/SEIS. A discussion of available adjacent parks can be found in the impacts discussion of chapter 4.

LU3010 – ADJACENT LANDS: IMPACTS TO OTHER STATE OR COUNTY PARKS

Concern ID:

29629

CONCERN STATEMENT:

Commenters either oppose or are concerned that the proposed draft plan/EIS will cause overcrowding in the remaining off-leash areas at GGNRA or at other dog parks, which may lead to overburdened dog parks, more traffic, more dog waste and/or more dog-to-dog conflicts. There are concerns that the proposed draft plan/EIS will cause environmental issues or unpleasant visitor experience at other parks.

Representative Quote(s):

Corr. ID: 426

Organization: *Not Specified*

Comment ID: 181611 **Organization Type:** Unaffiliated Individual

Representative Quote: If we were to loose the small off leash areas that we have currently, all SF dog walkers and owners would take over and invade the even smaller number of legal off leash SF City Parks. These displacements will inevitable cause more problems for SF residents and neighborhoods due to the lack of other options to exercise their dogs.

Corr. ID: 624

Organization: *Not Specified*

Comment ID: 182741 **Organization Type:** Unaffiliated Individual

Representative Quote: Public health and happiness will be severely affected and there is likely to be overcrowding in other areas of the city that will be overwhelmed by the sudden influx of dogs and dog-owners who will continue to seek areas that allow off-leash recreation.

Corr. ID: 1407

Organization: *Not Specified*

Comment ID: 195334 **Organization Type:** Unaffiliated Individual

Representative Quote: Our local parks were not designed to accommodate the quantity of traffic that would result from the closure of the GGNRA to owners and their dogs. The proposal passing will cause overcrowding and tensions due to overuse. It will also degrade our city parks due to sheer numbers or users, further burdening a local Parks and Rec Department already facing budget constraints.

Corr. ID: 1776

Organization: *Not Specified*

Comment ID: 191573 **Organization Type:** Unaffiliated Individual

Representative Quote: Unfortunately, dog parks can be crowded and small and don't have enough open space for many dogs to get maximum exercise. Also, the smaller space in a dog park doesn't allow for enough space to

escape from unsocialized dogs that unfortunately frequent dog parks. Overcrowding of dog parks will occur if the National Parks have off-leash restrictions ultimately causing more potential, unwelcome situations arising from unsocialized and possibly aggressive dogs.

Corr. ID: 4201 **Organization:** self, City College of San Francisco employee

Comment ID: 208837 **Organization Type:** Unaffiliated Individual
Representative Quote: Any attempt to make GGNRA areas off limits to unleashed dogs (except for areas enclosed for habitat restoration & for the safety of the dogs, say, from traffic) will ultimately put unbearable pressure on City parks-particularly Golden Gate Park. This pressure would not just be on professional and semi-professional dog-walkers; it would be an unacceptable hardship on dog owners and their dogs (some of whom rely on dog-walkers), who would be crowded into fewer and smaller spaces, which would embitter the current pleasant social interactions between people and between dogs, and where parking is already a problem. Golden Gate Park is already approaching the breaking point.

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. 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 for this draft plan/SEIS in chapter 4. 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, seven ROLAS would provide areas open to voice control dog walking, and those voice control areas would include beaches and large grassy or open areas.

Concern ID:
CONCERN
STATEMENT:

29630
Commenters have stated that the proposed draft plan/EIS did not adequately evaluate the environmental and social impacts to other nearby city and dog parks or playgrounds where visitation may increase due to changes in the regulations at GGNRA. Impacts to surrounding areas should be considered, and the draft plan/EIS should also include the number of dog walkers at each site and the number of dog walkers expected to move to other dog walking areas due to change in regulations. Additionally, some off-leash dog walking suggested within the document, such as Lake Merced, has been closed to dogs for years.

Representative Quote(s): **Corr. ID:** 1267 **Organization:** *Not Specified*
Comment ID: 194975 **Organization Type:** Unaffiliated Individual
Representative Quote: What is going to happen to my neighborhood park, Alamo Square, when the amount of land available for off leash recreation within the GGNRA is drastically reduced? No where within the DEIS is this impact even considered. The GGNRA is an urban park and the impact on the surrounding communities when changing park access regulations must be considered.

Corr. ID: 1332 **Organization:** *Not Specified*
Comment ID: 195089 **Organization Type:** Unaffiliated Individual
Representative Quote: The DEIS does not adequately address dispersion issues. The DEIS 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. Even more importantly, the DEIS does not address the environmental and social impact on small, neighborhood parks in cities like San Francisco next to the GGNRA. If that open space is lost to recreational access, people and their dogs will move to the much smaller city parks and they will not be able to absorb the hundreds or thousands of people with dogs each day that will be kicked out of the GGNRA. 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 DEIS suggests people with dogs go.

Corr. ID: 4213 **Organization:** California State Senate
Comment ID: 208873 **Organization Type:** State Government
Representative Quote: 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.

Corr. ID: 4442 **Organization:** San Francisco Dog Owners Group
Comment ID: 264237 **Organization Type:** Non-Governmental
Representative Quote: The GGNRA DEIS made no effort to analyze potential impacts on neighboring parks if recreational dog walkers are forced out of GGNRA sites by the action alternatives. The DEIS repeatedly says: "An increase in nearby parks is not likely..." when considering

impacts of the action alternatives. There is no evidence given to support these assertions of no impact. The DEIS made no attempt to quantify how many dog walkers will be displaced by closures of so much off-leash access.

Corr. ID: 4583

Organization: *Not Specified*

Comment ID: 209991

Organization Type: Unaffiliated Individual

Representative Quote: GGNRA/DEIS made no good faith attempt to analyze potential impacts on neighboring parks if recreational dog walkers are displaced from GGNRA sites. The DEIS repeats, "An increase in visitation in nearby parks is not likely..." in many instances where an increase in visitation to nearby parks is assured. Consider, as only one example of many, Alternative C, the Preferred Alternative for Fort Funston. Most of the off-leash area at Fort Funston will disappear under this alternative. The many people who visit this heavily used park will not fit into the small areas remaining. Yet GGNRA doesn't acknowledge they will go elsewhere, and says, "An increase in visitation in nearby parks is not likely." (DEIS p 1530) This allows the unsubstantiated conclusion that the Preferred Alternative will have, "No indirect impacts in adjacent parks."

Corr. ID: 4670

Organization: Fort Funston Dog Walkers

Comment ID: 264295

Organization Type: Non-Governmental

Representative Quote: Site-specific estimates are needed for 1/number of current visitors, 2/number of visitors who are accompanied by a dog, 3/where these visitors live, and 4/ an estimate of how many existing visitors would use their local parks under each alternative.

Based on this data, each alternative needs to be updated to include an accurate assessment of impacts to adjacent parks.

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 this 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.

MB1300 – MUIR BEACH: DESIRE OTHER ALTERNATIVE

Concern ID: 29251
CONCERN STATEMENT: Continue to allow dogs off leash and select alternative A as the preferred alternative.

Representative Quote(s): **Corr. ID:** 181 **Organization:** *Not Specified*
Comment ID: 182293 **Organization Type:** Unaffiliated Individual
Representative Quote: Regarding the plans for Muir Beach, My preferred alternative is Alternative A, which would require dogs to be on leash adjacent to the environmentally sensitive areas, but would leave the beach available for voice control.

Corr. ID: 201 **Organization:** *Not Specified*
Comment ID: 180611 **Organization Type:** Unaffiliated Individual
Representative Quote: Muir Beach: I prefer Alternative A. I have been using this beach for years to recreate with my dog and I see no problem with the current practice of voice control on the beach.

Corr. ID: 1827 **Organization:** *Not Specified*
Comment ID: 191937 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly urge you to continue to use education rather than segregation. I am a birdwatcher and a naturalist and appreciate the work that has been done on the lagoon. I love to see the otters and look forward to a time when the salmon are breeding. I do not feel that banning dogs from the entire beach is necessary or warranted. Post more signs regarding the restoration of Redwood Creek and its sensitive habitat clearly stating the rules. There are usually more children than dogs playing in Redwood Creek. I support Map 5A which continues off leash beach access for dogs and Map 7A which keeps the Coastal Fire Rd and the Trail at Muir Beach open for dogs.

Response: Alternative A was not selected as the preferred alternative. The preferred alternative was modified to allow on-leash dog walking on the beach. Please see chapter 2, Preferred Alternative for Muir Beach for additional rationale.

Concern ID: 29253
CONCERN STATEMENT: Commenters preferred alternative B as it allows dogs on the beach but protects the sensitive resources since the dogs would be on-leash.

Representative Quote(s): **Corr. ID:** 943 **Organization:** Muir Beach resident
Comment ID: 191493 **Organization Type:** Unaffiliated Individual
Representative Quote: I don't agree with closing Muir Beach to dogs altogether. I actually wouldn't object to allowing dogs on-leash if it is a viable alternative to banning dogs altogether. Allowing dogs on leash would mitigate many of the safety and habitat concerns that seem to be the main objections to allowing dogs in areas that are both wildlife habitat and public recreation.

Corr. ID: 4265 **Organization:** Kellner and Associates
Comment ID: 209119 **Organization Type:** Unaffiliated Individual
Representative Quote: MUIR BEACH. Alternative B, in which dogs would be on leash, should be implemented for this area to protect sensitive habitat (tidal lagoon, dunes, beach, and Redwood Creek) and associated wildlife from disturbance by dogs.

Corr. ID: 4541 **Organization:** *Not Specified*
Comment ID: 209718 **Organization Type:** Unaffiliated Individual
Representative Quote: I recognize the importance of the frog habitat and nesting area for birds and the future Salmon and possibly steel head trout areas near the wetland adjacent to Muir Beach. Given these sensitive areas I recommend that dogs be restricted to on leash only at Muir Beach. I recognize that this is a major change for the use at Muir Beach but the change has been taking place for years. Muir Beach is transforming to a wonderful Natural Gem and we must respect the sensitive nature of it. I do not think it is appropriate for dogs to run off leash at Muir beach because they will disrupt the shorebird population and frog population that I suspect will return.

Response: The preferred alternative for Muir Beach was modified to allow on-leash dog walking on the parking lot, beach, bridge path to the beach and the proposed Muir Beach Trail. Please see chapter 2, Preferred Alternative for Muir Beach for additional rationale.

Concern ID: 29254
CONCERN STATEMENT: Commenters preferred alternative E as it protects the sensitive resources and still allows dogs off leash in a ROLA.

Representative Quote(s): **Corr. ID:** 438 **Organization:** *Not Specified*
Comment ID: 181671 **Organization Type:** Unaffiliated Individual
Representative Quote: I understand the reasons behind the preferred alternatives, but dogs - and their owners - have the same rights to recreate in public areas too. I was told by a park ranger that dogs were going to be banned from Muir beach because of environmental concerns, especially for the creek restoration.

A more reasonable solution would be to let the dogs be off leash on the southern part of the beach, and signage could be placed along the stream that specifically bans dogs from that area.

Corr. ID: 1715 **Organization:** *Not Specified*
Comment ID: 191159 **Organization Type:** Unaffiliated Individual
Representative Quote: (3) Muir beach should protect the lagoon but provide ROLA areas. Alt 5-E is more appropriate.

Response: Alternative E was not selected as the preferred alternative; however, the preferred alternative was modified to allow on-leash dog walking on the beach. ROLAs would not be established due to the small size of the site and sensitive resources. Please see chapter 2, Preferred Alternative for Muir Beach for additional rationale.

MB1400 – MUIR BEACH: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29252
CONCERN STATEMENT: ROLA - Commenters stated that dogs have been allowed on Muir Beach for many years and this use should continue. Commenters don't understand why visitors would bring their dogs to Muir Beach only to be allowed to walk on-leash in the parking lot. Commenters suggested allowing ROLAs at Muir Beach. Some suggested areas for ROLAs include the southern portion of Muir Beach, the far northern portion of Muir Beach (near the nude beach), with the area between for on-leash dog walking. Another suggestion included a loop from the parking lot around the Middle Green Gulch trail back to Pacific Way, the Pacific Way Trail and the parking lot. Other commenters suggested that the ROLA proposed in alternative E should be increased in size.

Representative Quote(s): **Corr. ID:** 133 **Organization:** *Not Specified*
Comment ID: 182231 **Organization Type:** Unaffiliated Individual
Representative Quote: The proposed ROLA at Muir Beach is far too limited in size - dogs tend to have issues with each other in more confined spaces. The size of the beach prevents too many dogs from being in one place. I can see a problem with dogs being off leash on the busiest of weekend days, when space is at a premium

Corr. ID: 315 **Organization:** *Not Specified*
Comment ID: 181066 **Organization Type:** Unaffiliated Individual
Representative Quote: Please reconsider the plan for Muir Beach. It makes no sense to allow dogs on-leash in the parking lot, then ban them from the beach. Why would I take my dog to Muir Beach to walk him around the parking lot on-leash? I take my dog to Muir Beach so he can run and play ball, he's a lab retriever. A dog playing on the beach should be allowed off-leash and under voice control like mine is. If you want to have a leash law in the parking lot, or on the trail to the beach, or anywhere near the fresh water marsh-like area, I can see that, but banning dogs from the beach for off-leash makes no sense. Your own report shows little to no impact on the area one way or the other. Please stop trying to regulate what does not need regulating.

Corr. ID: 417 **Organization:** *Not Specified*
Comment ID: 181584 **Organization Type:** Unaffiliated Individual
Representative Quote: Muir Beach (proposed Alternative D): Current proposal prohibits dogs from Muir Beach, in interest of the lagoon. Instead, I propose off-leash dog walking on the southern end of the beach, nearest the cliffs (opposite end from the lagoon) and in the area (currently popular with nude sunbathers) below the houses at the far northern end. On leash only on the rest of the beach, and no dogs in the lagoon.

Corr. ID: 2920 **Organization:** Save Our Seashore
Comment ID: 203369 **Organization Type:** Conservation/Preservation
Representative Quote: COMMENTS ON TWO SPECIFIC MARIN AREAS

Save Our Seashore generally supports GGNRA's Preferred Alternatives in Marin County, but we believe that dog walking opportunities could be better balanced by being less limited at Muir Beach and being more limited at Rodeo yet retaining off-leash opportunities at both areas.

The Muir Beach Preferred Alternative totally eliminates the former off-leash zone and replaces it with an on-leash Pacific Way trail that ends at the parking lot. We suggest instead that Preferred Alternative include the currently-signed NPS on-leash trail that completes a 3/4 mile loop from the parking lot around the Middle Green Gulch trail back to Pacific Way, the Pacific Way Trail and the parking lot. This loop runs on Green Gulch land that by informal agreement with NPS has long allowed emergency vehicles, bikes and dogs, including off-leash. However, we believe this loop was left off the "existing conditions" (Alternative A) because at the time the DEIS was developed, GGNRA had not yet consummated its easement with Green Gulch. Now that the easement is formal, the loop should be shown both as existing and in our opinion as the Preferred Alternative. Including the fire road portions of the loop as a ROLA would be consistent with Marin County Open Space rules that allow off-leash use of Fire Roads and would create a largely off-leash loop that would partially compensate dog walkers for the removal of the public beach as an off-leash area (residents still have "Little Beach" as an option). In our opinion, the topography of the road and the existing farm fences at Green Gulch provide adequate "fencing" and visual notice of an off-leash area.

Response:

ROLAs would not be established at Muir Beach due to the small size of the site and sensitive resources. Please see chapter 2, Preferred Alternative for Muir Beach for additional rationale.

Concern ID:

29255

CONCERN STATEMENT:

Signage and Education - Additional signage clearly stating Muir Beach dog walking regulations and consequences need to be installed preferably at the footbridge to the beach. Signs educating visitors on restoration activities would reduce visitors within the lagoon and creek.

Representative Quote(s): **Corr. ID:** 840

Organization: *Not Specified*

Comment ID: 209620 **Organization Type:** Unaffiliated Individual

Representative Quote: I do understand the need to keep unleashed dogs out of restored areas, and I do practice precaution when I walk my dog off-leash at Muir Beach. So, I do feel that I can continue to abide by the policies already in place at this location. I would not visit the Beach if I could not allow my dog off-leash there. It is the main reason I visit and support this area.

All that said, I am worried that some dog owners do not diligently abide by Muir Beach policies, mainly because not enough clear, no-nonsense, uncompromising signage is posted. Added or better signage, with posted consequences for non-adherence, I feel would be enough to re-train the public in keeping their dogs out of restored areas, if this in fact is a problem.

Corr. ID: 2120 **Organization:** *Not Specified*
Comment ID: 193396 **Organization Type:** Unaffiliated Individual
Representative Quote: Clear signage as to prohibited areas at Muir Beach, Redwood Creek and the Lagoon. A ticket or two to dog owners and families playing, swimming, and damming the creek!

Corr. ID: 4543 **Organization:** *Not Specified*
Comment ID: 209795 **Organization Type:** Unaffiliated Individual
Representative Quote: In response to the NPS Dog Management Preferred Plan, we propose the following alternative plan:
- A dog litter bag dispenser and waste receptacle placed at the footbridge entrance to the area. Like many dog-friendly parks throughout the Bay Area, this is an effective way to encourage dog owners to pick up after their pets.
- Increased signage and education efforts provided by NPS so that all visitors to these areas are aware of current rules and regulations

Specifically:
- a large sign at the footbridge entry to the beach which clearly defines beach rules for all visitors.
- signs placed at the lagoon and creek areas which forbid swimming, trampling on vegetation or disturbing wildlife in these areas

Response: Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

Concern ID: 29257
CONCERN STATEMENT: [On-Leash - Dogs should be kept on-leash in areas near sensitive resources to protect the resources. Dogs on leash on the beach would also mitigate for some of the safety concerns. Dogs should also be kept on-leash on the boardwalk leading to the beach and within the parking lot.](#)

Representative Quote(s): **Corr. ID:** 1540 **Organization:** *Not Specified*
Comment ID: 190720 **Organization Type:** Unaffiliated Individual
Representative Quote: Re: Muir Beach & Dogs

Why not require dogs on leash in sensitive areas
ex: keep away from creek at north end during salmon spawning and away from the sensitive areas for birds. Consider example of McClures Beach where birds' areas protected during nesting season.

Corr. ID: 3152 **Organization:** *Not Specified*
Comment ID: 226795 **Organization Type:** Unaffiliated Individual
Representative Quote: If the Park Service has to take action at Muir Beach, just restrict dogs to being on leash in the parking lot and the boardwalk leading to the beach.

Response: The preferred alternative for Muir Beach was modified to allow on-leash dog walking within the parking lot, on the beach, along the bridge and path to beach. Please see chapter 2, Preferred Alternative for Muir Beach for additional rationale.

Concern ID:
CONCERN
STATEMENT:

30365

Commenters made suggestions to regulate ROLAS, including the use of time restrictions and fencing. Create time intervals that would allow ROLAs on the beach, such as restricting dog access in the early morning or on the weekends. Other suggestions were to have alternating days that ROLAs would be allowed, or limits on dog walking during breeding seasons of salmon and migrating birds. Commenters discussed fencing off areas for off-leash dog walking on the beach, with a barrier along the sand dunes from the bridge to the creek outlet to protect natural resources.

Representative Quote(s): **Corr. ID:** 1632 **Organization:** *Not Specified*

Comment ID: 223785 **Organization Type:** Unaffiliated Individual

Representative Quote: It is my understanding that Redwood Creek, which empties into Muir Beach, provides spawning access to salmon and steelhead in winter months. If it is concluded that dogs interfere with this access, ban dogs entirely for the spawning months and open the beach to dogs the rest of the year. This all-or-nothing plan would be easy to enforce and would be easily understood by dog owners.

Corr. ID: 2011 **Organization:** Ocean Riders of Marin

Comment ID: 200522 **Organization Type:** Unaffiliated Individual

Representative Quote: Muir Beach: I would like to see the following: Dogs on leash in parking lot until they get to the open beach; barrier from bridge to the creek outlet along the sand dune protection area on beach side of the creek; doggy disposal baggies at the boardwalk crossing in parking lot; No dogs in creek (as is now the law);

Corr. ID: 2011 **Organization:** Ocean Riders of Marin

Comment ID: 219036 **Organization Type:** Unaffiliated Individual

Representative Quote: Possible limitations such as weekend exclusion or mornings only (no dogs); or alternate days for families who have children who fear dogs. If dog owners are given the opportunity to monitor and educate each other to keep the privilege of dogs on the beach some of the Park Service concerns might be addressed. If it doesn't work, then the natural consequences would be to move to the next step. At least you've given them an opportunity.

Corr. ID: 3152 **Organization:** *Not Specified*

Comment ID: 226796 **Organization Type:** Unaffiliated Individual

Representative Quote: Restrict dogs from being in Redwood Creek, and if necessary, build better fences around the lagoon and the dune. The purpose of such fences would not be to ensure no dog ever enters an area where it does not belong; the purpose would be to ensure there are not so many dogs in the area as to cause irreparable harm.

Corr. ID: 3152 **Organization:** *Not Specified*

Comment ID: 226797 **Organization Type:** Unaffiliated Individual

Representative Quote: And if there times of the year when the presence of dogs threatens the breeding habitat of migrating birds, then just prohibit the presence of dogs during that limited period. The East Bay Regional Park Service can successfully do this.

Response:

Time of day restrictions can be difficult to enforce; however, this management concept will still remain an option for dog management in the future. Proposed fencing along the dunes and lagoon would not be able to completely exclude dogs from these areas. Please see chapter 2, National Park Service Preferred Alternative for additional information on time of use restrictions.

Concern ID:

41697

**CONCERN
STATEMENT:**

The suggestion of Little Beach as an alternative to Muir Beach for those with dogs is not feasible. The road is not well equipped to handle traffic and parking, the beach is not easily accessible, with the main access coming from Muir Beach, which would be off-limits to dogs. The trail to the beach is rocky, and difficult to use, especially at high tide. Little Beach lacks the necessary facilities for visitors. Commenters mentioned that Little Beach is a nude beach, and they did not feel comfortable taking their children there. In addition the location of Little Beach is not identified on Map 26 and 27, Adjacent Dog Use Areas.

Representative Quote(s): **Corr. ID:** 264 **Organization:** *Not Specified*

Comment ID: 180851 **Organization Type:** Unaffiliated Individual

Representative Quote: From what I read in your EIS you are suggesting that people and their dogs go to Little Beach! This is ludicrous. The road to and from there (sunset way) is not equipped to handle any more traffic. It is basically a fire road and needs to remain that way. There is no parking and what little there is on the roadside is usually residential parking. There are no facilities at Little Beach and during the winter months the beach is pretty much unusable as the sand washes out and it becomes just another bit of rocky coastline.

Corr. ID: 284 **Organization:** *Not Specified*

Comment ID: 180974 **Organization Type:** Unaffiliated Individual

Representative Quote: Little Beach is not accessible without crossing the main beach or driving along neighborhood private streets. Most of the time, the rocks are impassible because of surf and tides. There is NO PUBLIC PARKING WHATSOEVER on Sunset Way or Pacific Way. Both roads are private, with no shoulder parking and all spaces belong to homeowners. All lanes are fire lanes. Extra and illegally parked cars would create a hazard for the surrounding community in terms of blocking access to emergency vehicles.

Corr. ID: 1048 **Organization:** *Not Specified*

Comment ID: 192128 **Organization Type:** Unaffiliated Individual

Representative Quote: The Preferred Alternative document, in the section on Muir Beach, says "Off-leash dog walking can occur at a small beach area on county property adjacent to the NPS beach," however, that area does not seem to be identified on Map 5 Muir Beach. Looking at that map, I have to assume it's the southern-most end of the beach, the area outside of the green boundary line. If that is the area, how is it to be accessible? The only allowable way out of the parking lot (with a dog) as shown on the map is the Pacific Way Trail, which is "to be built." The map doesn't show the path a dog-walker would have to take via the Pacific Way Trail to reach the

south end of the beach, but it appears it could be several miles, which is hardly a practical option, especially for the elderly or handicapped. So what is the proposed access method for this beach area with a dog? Boat? Helicopter?

I've looked at Maps 26 27 Adjacent Dog Use Areas but I don't see the adjacent county property identified on those maps either. Please let me know if I have missed something. I look forward to clarification on this.

Corr. ID: 4257

Organization: *Not Specified*

Comment ID: 209178 **Organization Type:** Unaffiliated Individual

Representative Quote: I also wanted to add that I read in the DEIS that a part of Muir Beach known as Little Beach would remain dog friendly. This alternative would not work for us. My children at 7 and 10 and we do not go to Little Beach on nice days because it's a nude beach and we've encountered too many inappropriate things going on there. PLUS to expect that non-Muir Beach residents take their dogs to Little Beach would not work. As the website KeepMuirBeachDogFriendly.com states: Little Beach" is not accessible without crossing the main beach or driving along neighborhood private roads. Most of the time, the rocks are impassible because of surf and tides. The "social trail" from Pacific Way to the north end of Big Beach is a steep, hazardous, rocky pathway, with no handrails. There is no public parking on Sunset Way or Pacific Way. All spaces are on private property. All lanes are fire lanes. Extra and illegally parked cars would create a hazard for the surrounding community in terms of blocking access to emergency vehicles. For those who would arrive on foot via the road, there are no amenities or services for Little Beach. No trash cans. No toilets. In addition, Little Beach oftentimes has no beach at all during the winter or at high tide. Squeezing people over to that beach for use with their dogs is not a reasonable alternative. Formally stating and implementing such a plan would require appropriate impact studies and input from the surrounding community.

Response:

The preferred alternative for Muir Beach was modified to allow on-leash dog walking within the parking lot, on the beach, along the bridge and path to beach. Therefore, dog walkers would not need to use Little Beach, an area of beach outside of GGNRA boundaries, for dog walking. Please see chapter 2, Preferred Alternative for Muir Beach for additional rationale.

MH1300 – MARIN HEADLANDS: DESIRE OTHER ALTERNATIVE

Concern ID:

29229

**CONCERN
STATEMENT:**

Commenters support alternative A for the preferred alternative for the Marin Headlands. It is the only alternative that allows the visitor to have a long loop trail experience with their dog. The existing off-leash dog walking areas should continue to be available to dogs and their responsible owners. The commenters believe that the environmental impacts of dogs to protected butterflies is not evidence-based; therefore there is no reason to change the trail options at the Marin Headlands.

Representative Quote(s): **Corr. ID:** 3827 **Organization:** *Not Specified*
Comment ID: 209294 **Organization Type:** Unaffiliated Individual
Representative Quote: I would also strongly suggest incrementally less restriction on dogs on Marin headlands trails. The potential environmental damage to the environment of leashed dogs on these trails to protected butterflies is not evidence-based and is likely completely unrealistic. As such, I strongly suggest adopting alternative A or E at this site as well.

Response: Alternative A was not selected as the preferred alternative; however, the preferred alternative was modified to allow additional on-leash dog walking opportunities while still protecting resources. ROLAs would not be established within the Marin Headlands due to safety issues and to protect sensitive habitat. Please see chapter 2, Preferred Alternative for Marin Headlands for additional rationale, including "Alternatives Elements Eliminated from Further Consideration."

Concern ID: 29230
CONCERN STATEMENT: Commenters support alternative D because it provides the most protection of natural resources and a high level of visitor safety.

Representative Quote(s): **Corr. ID:** 3912 **Organization:** Alto Bowl Horseowners Association
Comment ID: 205586 **Organization Type:** Non-Governmental
Representative Quote: We believe it's very reasonable that "resource protection" and "visitor safety" should have highest priority in any plan, yet the NPS preferred alternatives for all Marin sites except Muir Beach appear to compromise those obligations in order to enable "multiple use" for the purpose of dog walking. We strongly suggest that alternative "D" is the most appropriate alternative for all Marin sites, providing strong protection of natural resources and a high level of visitor safety.

Response: Alternative D was not selected as the preferred alternative for Marin Headlands. 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.

MH1400 – MARIN HEADLANDS: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29231
CONCERN STATEMENT: Enforcement - NPS should continue to allow off-leash dog walking; however, if an owner is not responsible in adhering to the rules then they should be ticketed and fined at a high monetary penalty.

Representative Quote(s): **Corr. ID:** 628 **Organization:** *Not Specified*
Comment ID: 181311 **Organization Type:** Unaffiliated Individual
Representative Quote: My suggestion for Rodeo Beach and the Marin Headlands (it is where I frequent and am most familiar) is to continue to allow dogs to be off lease and under voice control. However, if an owner is not responsible in adhering to the concerns/rules of the Park, then they

should be ticketed and fined at a high monetary penalty to serve as a deterrent.

Response:

Enforcement policies for the draft plan/EIS have been added to chapter 2. Several suggestions provided by commenters for enforcement would not be feasible given the park resources or policies. Fine amounts are determined by the Federal Court; however, the court does take into consideration recommendations from the NPS for proposed increases to fine amounts.

Concern ID:

29232

**CONCERN
STATEMENT:**

ROLA - NPS should allow off-leash dog walking on the Coastal Trail and on-leash dog walking on the other trails. The preference is to keep a long loop trail open to off-leash dog walking and to create as many loops as possible with fewer dead-end trails.

Representative Quote(s):

Corr. ID: 85

Organization: *Not Specified*

Comment ID: 181892 **Organization Type:** Unaffiliated Individual

Representative Quote: Marin Headlands / Rodeo Beach

The preferred alternative massively reduces the trail available for hikers with a dog. We often complete the loop up the coastal trail to Hill 88 and then down Wolf Ridge / Miwok to return to Rodeo Beach. The trails are rarely crowded and a well behaved dog has no more impact than a person. The Hill 88 loop should be kept open to off-leash dogs. The preferred alternative for Rodeo Beach is acceptable.

Corr. ID: 417

Organization: *Not Specified*

Comment ID: 181585 **Organization Type:** Unaffiliated Individual

Representative Quote: Marin Headlands (proposed Alternative C): The current GGNRA proposal bans dogs from the Coastal Trail, which is the only trail (away from the parking lot/traffic) that currently allows dogs. Instead, dogs should be allowed off-leash on the Coastal Trail, on leash on the other mentioned trails, and off leash on Rodeo Beach. It does not seem logical that the Coastal Trail should remain a bike trail (nebulous under state traffic laws, more detrimental to sensitive habitat than dogs) but disallow dogs.

Corr. ID: 3934

Organization: 3rd Supervisorial District of the County of Marin

Comment ID: 205853 **Organization Type:** County Government

Representative Quote: 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

Response:

Dog walking on leash in parking lots and on paved, public roads is an element of all the action alternatives, including the preferred alternative. In the preferred alternative, ROLAs would not be established within the Marin Headlands due to visitor safety and to protect sensitive resources. Please see

chapter 2, Preferred Alternative for Marin Headlands for additional rationale, including "Alternatives Elements Eliminated from Further Consideration."

Concern ID:
CONCERN
STATEMENT:

30389

Commenters suggested opening other trails to on-leash dog walking such as Wolf Ridge Trail, Coastal Trail, Coyote Ridge Trail, and Miwok Fire Road, or all trails currently available to dogs with the addition of the Coastal to Miwok Trail, and the Julian Road extension east. Commenters do not believe that on-leash dog walking would negatively impact wildlife and wildlife habitat. Commenters believe that the additional limits on trail access are not based on or supported by sound science or any long-term monitoring of the sites. Other commenters suggested that dogs not be allowed at this site at all due to wildlife.

For an additional representative quote, see CF1400 comment number 209695.

Representative Quote(s): **Corr. ID:** 957 **Organization:** *Not Specified*
Comment ID: 191588 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs are all over the Marin Headlands, often off leash on trails that are non-dog. It is too confusing, not posted, and there is no monitoring. Let there be dogs on Rodeo Beach and one trail loop, and that's all.

Corr. ID: 1340 **Organization:** *Not Specified*
Comment ID: 195151 **Organization Type:** Unaffiliated Individual
Representative Quote: The preferred alternative would eliminate dog access to the Coastal Fire Road and Trail adjacent to Muir Beach. As it stands, these are the only remaining trails from Muir Beach that are open to dogs. For women who hike alone, this new rule presents a serious safety concern.

In addition, we believe that there should be a legal way for a person to walk between Muir Beach and the nearest community, Mill Valley. Currently, there is no continuous trail that allows this access with a dog. Adding a dog-friendly access of the Coyote Ridge Trail to Miwok Fire Road would allow hikers with dogs to cross from Muir Beach into Mill Valley.

Corr. ID: 1639 **Organization:** *Not Specified*
Comment ID: 200219 **Organization Type:** Unaffiliated Individual
Representative Quote: As someone who takes great pleasure in hiking the Marin Headlands Trails with my dog (a dog who is voice-control trained), I do not understand in what way on-leash walking on the Coastal Trail would negatively impact habitat.

Corr. ID: 1820 **Organization:** *Not Specified*
Comment ID: 191914 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to you regarding the Dog

Management Draft Plan/DEIS for Golden Gate National Recreation Area. I am requesting that you consider revising your recommendations to continue to allow on-leash dogs on the following Marin Headlands Trails: Coastal Trail (Hill 88 to Muir Beach) and (Golden Gate Bridge to Hill 88, including Lagoon Trail), Coastal, Wolf Ridge, Miwok Loop, South Rodeo Beach Trail, North Miwok Trail (from Tennessee Valley to Highway 1) and County View Trail.

I walk on those trails frequently with my dog and those hikes are an integral part of my life. Those trails are generally not crowded and there is a good mix of people with dogs and people walking without dogs. I have never encountered any problems between people and dogs, nor have I seen dogs chasing birds or disrupting the environment

Corr. ID: 4687 **Organization:** County of Marin Dept. of Parks and Open Space

Comment ID: 227456 **Organization Type:** Non-Governmental
Representative Quote: New restrictions in the Marin Headlands surely will result in significant impacts of displacement to county parks. The Headlands trails that are currently open to off leash use (as shown in alternative A) constitute the quintessential Marin County trails experience. These trails are beloved by all, including those who recreate with their dogs. The county acknowledges that current impacts to resources warrant management changes. If the same trails depicted as off leash in alternative A were made leash-required, these impacts could be minor. The draft EIS analysis of impacts to the Marin Headlands trails does not conclusively indicate closure of these trails to dogs. It does support requiring leashes. The county wonders if the feasibility of achieving compliance with a leash rule dictated the decision to choose closure of the loop of the Coastal Trail to Wolf Trail to Miwok Trail. We urge GGNRA to give further consideration to adding this loop and the Julian Road (Coastal Trail) extension east to the leash-required inventory. Perhaps additional outreach and rigor of enforcement could help to underscore the importance of reducing resource impacts in this iconic area.

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.

MP1300 – MORI POINT: DESIRE OTHER ALTERNATIVE

Concern ID: 29276
CONCERN STATEMENT: Dogs should be banned from Mori Point (alternative D) because of the impact they have on animals and plants in the area. Commenters had seen dogs chasing birds and digging up plants.

Representative Quote(s): **Corr. ID:** 1159 **Organization:** Not Specified
Comment ID: 193463 **Organization Type:** Unaffiliated Individual
Representative Quote: Mori Point also needs rules banning dogs or requiring dogs to be on-leash. Dogs routinely chase migrating birds and

shore birds on the beach and along the trails above the newly constructed stairs. On many occasions I've seen dogs digging up the wildflowers out on the point above the stairs at Mori Point.

Corr. ID: 1238 **Organization:** *Not Specified*
Comment ID: 194897 **Organization Type:** Unaffiliated Individual
Representative Quote: I love dogs, but I support prohibiting them completely from Mori Point. As someone who witnesses the heart-breaking impact of dog-owners on the very few areas where wild animals and plants can exist, I beseech the GGNRA to prohibit dogs from Mori Point.

Response: Alternative D was not selected as the preferred alternative. The preferred alternative would allow on-leash dog walking on some of the trails at the site. Trails in areas with sensitive resources would not allow dog walking. Please see chapter 2, Preferred Alternative for Mori Point for additional rationale.

Concern ID: 29278
CONCERN STATEMENT: Commenters support alternative E and feel that dog walking issues should be resolved by enforcement.

Representative Quote(s): **Corr. ID:** 1131 **Organization:** *Not Specified*
Comment ID: 192446 **Organization Type:** Unaffiliated Individual
Representative Quote: I don't think any additional rules are required, and the problems perceived could be solved simply by enforcing the current rules. I would prefer options A or E for Sweeney ridge, Mori Point, and Milagra Ridge.

Response: The preferred alternative was modified to include an additional on-leash dog walking trails. Please see chapter 2, Preferred Alternative for Mori Point for additional rationale.

Concern ID: 29279
CONCERN STATEMENT: Commenters supported alternative A as they wanted to retain current on-leash walking areas at Mori Point. They felt having access to current trails was beneficial to their experience at the site.

Representative Quote(s): **Corr. ID:** 821 **Organization:** *Not Specified*
Comment ID: 186095 **Organization Type:** Unaffiliated Individual
Representative Quote: FOR MORI POINT, Pacifica. I prefer Alternative A (on-leash walking for all developed trails) to the current preferred alternative. The Park Service preferred alternative seems to allow dogs in the most sensitive habitat (frog ponds) while prohibiting them from being walked on some of the less-used hill trails and also the Pollywog Path which runs along the back fence of Fairway Park residences, and is used very frequently for access by residents of that neighborhood. There also does not seem to be any useful purpose served by preventing leashed dogs from using Upper Mori Trail, Lishumsa Trail, the Headlands Trail, or the Bluff Grail-- all of which are quite far from the ponds & protected habitat. and also areas less likely to be used by families with small children or elderly visitors, as they are comparatively more rugged with a steep

upgrade. I would note that I see no problem with closing the Bootlegger's Steps to dogs. Dogs don't need stairs and that particular path is more often frequented by new and infrequent visitors to the park rather than those who regularly walk their dogs in the area.

Corr. ID: 1724 **Organization:** *Not Specified*

Comment ID: 191175 **Organization Type:** Unaffiliated Individual

Representative Quote: My main area of concern is Mori Point, because I live in Fairway Park. The availability of the trails as they are (Alt. A) is my strong choice. I walk one dog nearly every day, and access via Pollywog Path. My dog is always leashed.

Corr. ID: 3111 **Organization:** *Not Specified*

Comment ID: 201517 **Organization Type:** Unaffiliated Individual

Representative Quote: I regularly use the trails of Mori Point and find the status quo quite satisfactory. Dog owners are generally VERY responsible and problems are rare. There seems to be a synergy in the area between human use (including people with dogs) and efforts to plan native native plant species and remove invasives. I see no need for any change, especially to a policy that will not allow even leashed-dogs on many of the trails.

Corr. ID: 4118 **Organization:** *Not Specified*

Comment ID: 208516 **Organization Type:** Unaffiliated Individual

Representative Quote: MORI POINT - I support Alternative A, No Action (in harmony with 1979 Pet Policy). I have walked all areas of Mori Point for almost 15 years. Never in that time have I been impacted in my enjoyment of the area by individuals with on leash dogs. Watching dogs enjoy the area along with their caretakers has increased my enjoyment of the area. (I do not support off leash dog walking along the more popular trails, as I have on occasion observed unleashed dogs running through the brush including areas that are sensitive to other wildlife.)

Response:

Alternative A was not selected as the preferred alternative due to sensitive resources at Mori Point. However, the preferred alternative was modified to include an additional on-leash dog walking opportunity. Please see chapter 2, Preferred Alternative for Mori Point for additional rationale. There were no properties in San Mateo managed by GGNRA in 1979; thus the 1979 Citizen's Advisory Commission Pet Policy did not include any San Mateo areas.

MP1400 – MORI POINT: SUGGEST CHANGE IN ALTERNATIVE

Concern ID:

29271

**CONCERN
STATEMENT:**

ROLA - Mori Point should be open to off-leash dog walking, or should include areas for off-leash dog walking, such as west of Moose Lodge and an area adjacent to the beach. If this site was open to off-leash dog walking, residents would not need to drive elsewhere to walk their dogs. Additionally visitors did not feel their safety or experience was compromised by off-leash dogs at this site.

Representative Quote(s): **Corr. ID:** 698 **Organization:** *Not Specified*
Comment ID: 182688 **Organization Type:** Unaffiliated Individual
Representative Quote: Regarding Mori Point dog walking.
I'd like to suggest using two (2) areas for "off leash" walking.
First site: Approximately 100 yards WEST from the Moose Lodge there is a small bowl (approx 3 acres) located between the service road/trail and upper hiking trail. That bowl would allow off leash dog walking away from the main park habitat/trails.
Second site: Far west, adjacent to the beach, at the SOUTH end of the berm there is a small grove of Cypress trees (approx 1 acre). This site would require some fencing, but it would serve the off leash dog walking community well.

Corr. ID: 1258 **Organization:** *Not Specified*
Comment ID: 194956 **Organization Type:** Unaffiliated Individual
Representative Quote: I would love to ask GGNRA to please consider leave Mori Point to be the open park for dogs so, they can run free and get good exercise and besides this park used to be open space for all the dogs and never have any regulation before. Please re-consider to keep this park to be the open park specially for the residence that live around Mori Point so we do not have to drive somewhere else to take our dog for walk.

Corr. ID: 1739 **Organization:** *Not Specified*
Comment ID: 191195 **Organization Type:** Unaffiliated Individual
Representative Quote: Mori Point was bought by Pacifica residents through the Pacifica land trust, at considerable expense, funded by donations - and given to the Park Service with the expectation of preserving existing use.

The proposed plan takes away what we fought so hard to save.

Keep ALL Mori Point trails open to leashed dogs.

Consider also creating some off-leash areas at teh top of the ridge.

Response: No ROLAs would be established at Mori Point in order to protect sensitive resources and for safety concerns. Please see chapter 2, Preferred Alternative for Mori Point for additional rationale.

Concern ID: 29272
CONCERN STATEMENT: On-Leash - Commenters expressed a desire to keep Pollywog path, bootlegger's steps, headlands trail, Lishumsha, and other areas open to on-leash dogs, in addition to establishing a loop trail. They felt impacts to the nearby pond habitats were not significant enough to warrant limiting dogs on the trail, and that safety was improved at the site by maintaining access to these trails.

Representative Quote(s): **Corr. ID:** 752 **Organization:** *Not Specified*
Comment ID: 185428 **Organization Type:** Unaffiliated Individual
Representative Quote: Bootleggers Steps are man made (earth moved, vegetation removed, wildlife disturbed in the process) and a dog using them

would cause no additional harm. I climb those steps every weekend with my dog and closing those steps to our use would negatively impact my experience. Please change the plan for Mori Point to allow use of all trails and Bootleggers Steps to dog walkers

Corr. ID: 1706 **Organization:** *Not Specified*
Comment ID: 191130 **Organization Type:** Unaffiliated Individual
Representative Quote: Mori Point: First thank you for the excellent historical references done on signage about the Old Mori Inn and the Mori Family. I'm a member of the Pacifica Historical Society and you did a comendable job.

Mori Trails; I support Mapt 17-E for on leash dog walking, but want access to the bootleggers Steps as well as Lishumsha trail. Also, I'd like to continue walking my dog on leash out to the end of the Point at Sunset.

Lishumsha Trail in particular is very smooth for wheels. My neighbor uses an electric cart and occasionally comes out with us on walks. Keeping this section of the trail open to on leash dogs also keeps open a good access for disabled visitors with pets!

Bootlegger's Steps are easy for me to go up with my dog, but I can't go down them. Knee problems! Please keep the steps open to on leash too.

Corr. ID: 4688 **Organization:** *Not Specified*
Comment ID: 210090 **Organization Type:** State Government
Representative Quote: 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.

Response: The preferred alternative was modified to include an additional on-leash dog walking opportunities at Mori Point. Please see chapter 2, Preferred Alternative for Mori Point for additional rationale.

MR1300 – MILAGRA RIDGE: DESIRE OTHER ALTERNATIVE

Concern ID: 29337
CONCERN STATEMENT: Alternative A was requested by commenters, who felt that the existing policy is working fine, and that other impacts from dogs could be mitigated by other means. They felt Milagra Ridge is a less spoiled area, and that the current restrictions were adequate to protect wildlife.

Representative Quote(s): **Corr. ID:** 3494 **Organization:** *Not Specified*
Comment ID: 203371 **Organization Type:** Unaffiliated Individual
Representative Quote: Second, the rationale for the complete ban on dogs

from trails such as Milagra Ridge seems highly flawed. At the March 9 open house in Pacifica I was told by the ranger there the GGNRA wanted to completely ban dogs from Milagra Ridge because it constituted one of the less spoiled natural areas in the county and hosted a variety of birds. The fact that Milagra Ridge is an island ecosystem with a wide array of species is undisputed, and is part of what makes the area special. However, this is true today although dogs are currently permitted there on leash. Since birds and other wildlife are clearly happy there, why change what is already working when it is at the expense of people like me who want to use these trails with my dogs? On Milagra Ridge in particular there is such thick bush and foliage on each side of the trail that it is almost impossible for dogs, on leash or off, to leave the trail and disrupt the animals. Furthermore, these trails are sufficiently steep and remote that very few people (with or without dogs) actually use them except die-hard hikers and trail runners like myself (again, especially beyond the 2-3 miles past the parking lot). The decision to ban dogs entirely from them seems based on an idealistic vision that is not in keeping with the GGNRA's mission. It does not take into consideration the traditional use of this land or the reality of what is working there today already with the current leash law in place.

Corr. ID: 4640 **Organization:** *Not Specified*
Comment ID: 227730 **Organization Type:** Unaffiliated Individual
Representative Quote: Milagra

There is no scientific evidence indicating that dog recreation, on-leash or by voice-control, has any significant impact on visitors or the natural environment. I'm simply designating this as on-leash to provide for balanced recreation for the few people that desire to avoid dog interaction.

Response:

Alternative A was not selected as the preferred alternative in order to protect wildlife and mission blue butterfly habitat areas. Please see chapter 2, Preferred Alternative for Milagra Ridge for additional rationale.

Concern ID:
CONCERN
STATEMENT:

29339
[Commenters preferred banning dogs, as is proposed in alternative D, because it would be difficult to enforce leash laws at Milagra Ridge.](#)

Representative Quote(s): **Corr. ID:** 3927 **Organization:** *Not Specified*
Comment ID: 205768 **Organization Type:** Unaffiliated Individual
Representative Quote: Since the leash law is not or cannot be enforced at Milagra Ridge and Mori Point parks I support an alternative to the leash law that prohibits dogs from these parks, and designates space within the north San Mateo park system that allows free-running dogs in an area which will not adversely impact safe and enjoyable use by all people, and will not cause damage to native environments. I would think the issues I've experienced are not specific to just the above mentioned two parks and so think this alternative should apply to other parks as well, but I can only speak from personal experience at these two.

Response:

Dog walking would not be excluded from Milagra Ridge. The preferred alternative would allow both an on-leash dog walking and no-dog

experience. Dog walking regulations would be clear and easily enforceable. Please see chapter 2, Preferred Alternative for Milagra Ridge for additional rationale.

MR1400 – MILAGRA RIDGE: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29340
CONCERN STATEMENT: On-Leash - Commenters questioned why the loop trail was not included in the plans, as the trail has a barrier on both sides to prevent damage from dogs.

Representative Quote(s): **Corr. ID:** 941 **Organization:** *Not Specified*
Comment ID: 191459 **Organization Type:** Unaffiliated Individual
Representative Quote: Milagra Ridge: why is the Loop trail off limits to leashed dogs? The trail has barriers on both sides. What is the argument for not allowing on leash dogs?

Response: Please see chapter 2, Preferred Alternative for Milagra Ridge for rationale.

Concern ID: 29341
CONCERN STATEMENT: ROLA - Having an off-leash area at Milagra Ridge in an area where it will not cause damage would be beneficial to visitors. Visitor use at this site is low, and the site could support off-leash dog walking.

Representative Quote(s): **Corr. ID:** 841 **Organization:** *Not Specified*
Comment ID: 186201 **Organization Type:** Unaffiliated Individual
Representative Quote: Milagra Ridge: the parking at Milagra Ridge limits the amount of use. Generally only 6-8 cars can park there at any one time. I take my dog there regularly and might occasionally bump into 3-4 people during an entire hour-long walk. I think that this area should be relaxed to voice-control, but that didn't seem to be an option.

Corr. ID: 4102 **Organization:** SFDOG
Comment ID: 208454 **Organization Type:** Unaffiliated Individual
Representative Quote: In addition, the DEIS should add the following off-leash, voice control areas in San Mateo:
1) a voice control trail from the Bay-side to the Coast-side on Sweeney Ridge (e.g., Sneath Lane to Fassler)
2) Mori Point off-leash, voice control everywhere except on-leash around the frog ponds and traffic areas and no dogs on the the Upper Mori Trail
3) Milagra should be off-leash, voice control everywhere
There is no justification presented in the DEIS to justify the restrictions proposed to off-leash in San Mateo.

Response: ROLAs would not be established at Milagra Ridge due to safety concerns and to protect sensitive resources at the site. Please see chapter 2, Preferred Alternative for Milagra Ridge for additional rationale.

MT1000 – MISCELLANEOUS TOPICS: GENERAL COMMENTS

Concern ID: 30156
CONCERN STATEMENT: Commenters expressed concerns about the plan with regards to the impact on guide and companion dogs. Many of these commenters noted that guide dogs are at risk from off-leash dogs, and that this compromises the safety of the guided individual, while other commenters stressed the need to allow guide dogs within the park, and others expressed concerns with the regulation of those using guide dogs.

Representative Quote(s): **Corr. ID:** 277 **Organization:** *Not Specified*
Comment ID: 180903 **Organization Type:** Unaffiliated Individual
Representative Quote: Most people with pet dogs are not aware that there are state and federal laws governing distracting a guide dog. An unleashed dog charging the guide fits that criteria. Perhaps leash regulations will help prevent the unleashed dogs owner from paying for that very expensive guide dog.

Corr. ID: 277 **Organization:** *Not Specified*
Comment ID: 180906 **Organization Type:** Unaffiliated Individual
Representative Quote: An unleashed dog rushing the guide dog team can make the guide dog skittish and afraid. That puts the guide dog team at risk. If the guide dog is more worried about being rushed by another dog, that guide is not doing it's job and injury to both the guide dog and guide dog user could occur.

Corr. ID: 3096 **Organization:** *Not Specified*
Comment ID: 201487 **Organization Type:** Unaffiliated Individual
Representative Quote: Some people need a guide dog or have a service dog and they need to go places like parks, trails and beaches. And people who are blind or have a disability sometimes need a dog to help them walk. Service dogs should be allowed almost any where because they are really needed by their owners.

Corr. ID: 3153 **Organization:** Guide Dog Users, Inc.
Comment ID: 202873 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to you on behalf of Guide Dog Users, Inc. (GDUI) an international organization dedicated to advocacy, peer support, public education and all aspects of training, working and living with dogs specially-trained to guide blind and visually-impaired people. GDUI urges you to support the adoption of regulations which would create physically enclosed spaces as off-leash dog play areas for the safety of guide dog handlers and their dogs.

In a 2003 GDUI survey, 89% of guide dog handlers reported incidents of interference from unleashed dogs, placing these visually impaired individuals in serious danger. Even when an interfering pet dog simply wants to play, the team's attention to important elements of safe travel is distracted making the blind person vulnerable to the dangers of traffic and other environmental challenges. 42% of respondents have been the victims of attacks by unleashed dogs causing physical and psychological injury to

both members of the team and even death or premature retirement of the guide dog which can cost more than \$50,000 to replace.

GDUI supports the enforcement of leash laws in general because such laws provide important safeguards for people, our pets, wildlife, and parks. Enforcement of the National Park System's leash law and the creation of off leash play areas for dogs would insure dogs have reasonable access to the Park without jeopardizing the safety of disabled individuals partnered with specially trained assistance dogs, pet dogs, wildlife, or park visitors. GDUI urges creation of off leash play areas for pet dogs at the Golden Gate National Recreation Area.

Corr. ID: 3721

Organization: *Not Specified*

Comment ID: 202303 **Organization Type:** Unaffiliated Individual

Representative Quote: This document is flawed as to scope and to how it avoids addressing laws and factors passed after NEPA went into effect. SO, this document at least needs a supplement or revision, if not a substantial re-do.

NOWHERE is there any mention of or concern for a specific animal grouping--
guide dogs and service dogs.

Nor is there any reference to protecting vulnerable HUMAN populations.

Yet, Guide Dogs for the Blind has been in San Rafael, CA, since the 1942--
LONG before NEPA was passed and long before the establishment of the GGNRA. Worse, in the files of GGNRA is a 2005 letter from Guide Dogs for the Blind, wherein their field service manager cites a 2003 survey indicating that:

89% of their graduates [EIGHTY-NINE PER CENT] "have had Guide Dogs interfered with by off-leash dogs"; and further that

42% of their graduates [FORTY-TWO PER CENT]
" have had their Guide Dogs ATTACKED [[emphasis mine]] by off-leash dogs".

When a person using A Guide Dog loses those services, it can take up to two years and cost \$50,000, or more, to get a new Guide Dog. During that interim training period, the mobility of that person whose guide dog was incapacitated is greatly limited.

If, contrary to existing policy elsewhere within the NPS system GGNRA allows off-leash dogs, then GGNRA can be viewed as liable for injuries to the Guide Dog, to the person, and to training and replacement costs.

Response:

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. The preferred alternative establishes on-leash dog walking areas that would allow the opportunity for visitors with service dogs to be separate from off-leash dogs

in the majority of sites under consideration for off-leash dog walking. A discussion on impacts to service dogs has been added to the draft plan/SEIS. Please see chapter 4, Visitor Use and Experience.

Concern ID: 30157
CONCERN STATEMENT: Commenters have questions regarding existing GGNRA regulations or the signage/fencing at the park, and the requirement to pick up after pets.

Representative Quote(s): **Corr. ID:** 658 **Organization:** *Not Specified*
Comment ID: 181514 **Organization Type:** Unaffiliated Individual
Representative Quote: We could find no mention of requiring dog owners to pick up their pets' feces.

Corr. ID: 1390 **Organization:** *Not Specified*
Comment ID: 195294 **Organization Type:** Unaffiliated Individual
Representative Quote: I believe that new restrictions placed on dog owners will not be overwhelmingly obeyed; the present restrictions are either not known or obeyed by many dog owners.

Corr. ID: 1696 **Organization:** *Not Specified*
Comment ID: 191109 **Organization Type:** Unaffiliated Individual
Representative Quote: I try to keep my dogs behaving properly & were permitted. However it is very difficult to tell regarding certain area if they are protected or not. The fencing is inadequate!!

Response: Additional information regarding the existing GGNRA dog walking regulations has been added to the draft plan/SEIS. Please see chapter 2, Alternative A: No Action (Continuation of Existing Management) for additional information. Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage. The requirement to pick up and dispose of pet litter is an existing NPS regulation, and would be further defined under the draft plan/SEIS; see Appendix E, Dog Walking Requirements, for further details.

Concern ID: 30159
CONCERN STATEMENT: Commenters believe that the preferred alternatives in the plan will negatively affect the local economy including many small businesses. Professional dog walkers will be forced to raise their fees, which may be unaffordable by some middle class dog owners. Some professional dog walkers may go out of business. Some small businesses that are located near areas that plan to eliminate off-leash dog walking or ban dogs will lose the business from dog owners that will go elsewhere to walk their dog. The plan does not account for the economic benefit of having dog-friendly areas which attract tourists.

Representative Quote(s): **Corr. ID:** 530 **Organization:** *Not Specified*
Comment ID: 182401 **Organization Type:** Unaffiliated Individual
Representative Quote: I also know many people who make their living walking dogs at Fort Funston. Requiring them to keep their dogs on-leash could potentially put them out of work or at the very least, dramatically reduce their income due the fewer number of dogs they could walk.

Corr. ID: 586 **Organization:** *Not Specified*
Comment ID: 182111 **Organization Type:** Unaffiliated Individual
Representative Quote: I work full-time during the week and my dog enjoys a long dog walk with a group of 8-10 other dogs led by a passionate dog walker whose business would be jeopardized by the plan due to restrictions on the number of dogs he can have out with him as well as having a limited area to play (they currently go to Fort Funston every day to play).

Corr. ID: 1547 **Organization:** *Not Specified*
Comment ID: 190740 **Organization Type:** Unaffiliated Individual
Representative Quote: This unique National Recreation area is just that: a recreation area meant to be preserved for recreation, established to preserve the beauty of coastal living for all to enjoy even as the urban areas become more densely populated and suburbs stretch at the seams of growth limits. For every action, there is a reaction and the severe curtailing of the use these lands were designed for, will no doubt stress other open areas and parks, leading to other conflicts among groups of users. Plus many hundreds of small businesses that include pet walking would be affected- and I think it's a safe bet that those business owners are among the most conscientious users of the GGNRA lands because their very jobs depend upon the fact that they observe the rules and avoid tickets.

Corr. ID: 1566 **Organization:** *Not Specified*
Comment ID: 190771 **Organization Type:** Unaffiliated Individual
Representative Quote: Like everyone in a free country, dog walkers have a right to make a living. If you limit them to 3 dogs a t a time, they will have to raise their fee in order to make a living. Then many middle class dog owners cannot afford a walker.

Corr. ID: 2008 **Organization:** *Not Specified*
Comment ID: 193215 **Organization Type:** Unaffiliated Individual
Representative Quote: Dog walkers typically charge between \$15-25 per dog perday. If dog walkers are limited to only "6" dogs, the price to have a dog walked will have to jump up to \$45-70/ dog-day. Is this fair for dog owners who pay to have their dogs walked while they are at work?

Corr. ID: 4693 **Organization:** *Not Specified*
Comment ID: 210070 **Organization Type:** Unaffiliated Individual
Representative Quote: In the section on Issues and Impact Topics Dismissed from Analysis, the "Socioeconomics" topic was inappropriately dismissed from the environmental consequences analysis. The cost-benefit analysis needs to be performed as part of the DEIS to substantiate the claims that plan implementation would have a negligible socioeconomic effect.

Response:

The preferred alternative allows all dog walkers, both private and commercial, to walk 3 dogs at one time; any dog walker - private or commercial - could also apply for a permit to walk up to 6 dogs. Permits would be issued for 7 GGNRA ROLAs. Additional rationale for the

dismissal of socioeconomics has been added to the draft plan/SEIS. Please see chapter 1, Issues and Impact Topics Dismissed from Analysis.

Concern ID: 30166

CONCERN STATEMENT:

Commenters request that the draft plan/EIS should address options for changing the management of GGNRA from the NPS to another agency.

Representative Quote(s): **Corr. ID:** 3142

Organization: *Not Specified*

Comment ID: 202645 **Organization Type:** Unaffiliated Individual

Representative Quote: Please be sure to address the options for changing who manages the GGNRA. I believe national recreational areas can be managed by organizations other than NPS. Thus, NPS restrictions should not be imposed upon GGNRA. If need be, how do we change who manages GGNRA (e.g., Forestry Service)?

Response:

Agency management changes, such as transferring GGNRA lands to another agency, fall outside the scope of the dog management plan. Proposals of this magnitude would not be considered in a management plan focusing on a single use; rather, it would require consideration in a general management plan or other broad, comprehensive planning effort. Even if such a proposal were to fall within the scope of the dog management planning effort, which it does not, this proposal would not meet the purpose and need of the plan, including the objectives to preserve and protect natural and cultural resources and natural processes, and maintain park resources and values for future generations.

Concern ID: 30167

CONCERN STATEMENT:

Commenters are concerned the proposed draft plan/EIS will cause them to drive longer commutes to exercise their dogs. The plan will cause more greenhouse gas emissions because visitors will now have to drive to parks that have off-lease dog walking, whereas they are walking now.

Representative Quote(s): **Corr. ID:** 25

Organization: *Not Specified*

Comment ID: 181466 **Organization Type:** Unaffiliated Individual

Representative Quote: As residents of Muir Beach, there aren't a lot of choices for walking a dog. Muir Beach is a small community that is ringed by state and national park land. Restricting to the options that allow no dogs would only mean that we have to use our greenhouse gas polluting cars to go somewhere that allows dogs I would posit that my car harms the environment more than my dog, unless the GGNRA has evidence to the contrary to present to the public.

Corr. ID: 1893

Organization: University of San Francisco

Comment ID: 200618 **Organization Type:** Unaffiliated Individual

Representative Quote: Also, it is entirely possible that there would be conflicts between the dogs themselves in this new, overcrowded environment. Finally, from a broad environmental perspective, let me point out that if I drive elsewhere (say to the East Bay which has more dog-friendly parks), I will be increasing my global carbon footprint and thus degrading the environment in other ways. Think of the big picture before moving forward.

Corr. ID: 2271 **Organization:** *Not Specified*
Comment ID: 201055 **Organization Type:** Unaffiliated Individual
Representative Quote: Please don't make me drive one hour each to enjoy a day's hike with my dog, just think of the added congestion and pollution!

Response:

Following the public comment period, the preferred alternatives were adjusted at some sites to allow additional, geographically logical, dog walking access. Please see chapter 2, National Park Service Preferred Alternative for additional details on access.

As discussed in chapter 3, 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 the 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 would 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 detail in chapter 4.

Concern ID:

30171

CONCERN STATEMENT:

A commenter has requested to know who the cooperating agencies are that have been involved in the draft plan/EIS process.

Representative Quote(s):

Corr. ID: 4070 **Organization:** Mar Vista Stables
Comment ID: 207682 **Organization Type:** Unaffiliated Individual
Representative Quote: 4)Who are the cooperating agencies in this process? When were they involved? Did they sign an MOU identifying their role in the process?

Response:

The Presidio Trust is a cooperating agency for this draft plan/SEIS. The NPS granted the Presidio Trust cooperating agency status with regard to those lands addressed by the draft plan/SEIS adjacent to the Presidio, Area B. This is stated in chapter 1, Introduction and chapter 5, Cooperating Agency.

Concern ID:

31663

CONCERN STATEMENT:

Commenters questioned why monitoring was not completed in GGNRA as it is in other parks, and noted the importance of such monitoring in making such management decisions.

Representative Quote(s):

Corr. ID: 4677 **Organization:** Ocean Beach Dog
Comment ID: 227499 **Organization Type:** Civic Groups
Representative Quote: A subsection of the aforementioned web site (Program Goals) discusses the goals of park monitoring: "Natural resource

monitoring provides site-specific information needed to understand and identify change in complex, variable, and imperfectly understood natural systems and to determine whether observed changes are within natural levels of variability or may be indicators of unwanted human influences. Thus, monitoring provides a basis for understanding and identifying meaningful change in natural systems characterized by complexity, variability, and surprises. Monitoring data help to define the normal limits of natural variation in park resources and provide a basis for understanding observed changes; monitoring results may also be used to determine what constitutes impairment and to identify the need to initiate or change management practices."

As discussed above, it seems impossible that GGNRA management would undertake a management change as proposed in this DEIS without any evidence of monitoring as a means to identify the alleged impairment.

Response:

As discussed in chapter 3, vegetation and wildlife management at GGNRA is primarily focused on research, monitoring, and meeting desired conditions. The goal of vegetation and wildlife management at GGNRA is to improve monitoring, restore or enhance populations and/or remove threats, and reduce conflicts between park visitors and sensitive species. GGNRA participates in monitoring through the San Francisco Bay Area Network Inventory & Monitoring (I&M) Program. This I&M Program monitors resources at GGNRA identified as vital signs and includes the following: amphibians/reptiles, fish, landbirds, pinnipeds, raptors, listed species (western snowy plover and Northern spotted owl), plant communities, invasive plants, specific habitats (riparian, wetland, and rocky intertidal), air quality, climate change, landscape dynamics, stream flow, and water quality. GGNRA completes monitoring in all three counties (San Francisco, Marin, and San Mateo County) and monitors resources outside of the I&M Program, including joint monitoring efforts between GGNRA and GGNPC for the following: listed species (mission blue butterfly, San Bruno elfin butterfly, California red-legged frog, San Francisco garter snake, rare plants), invasive plants, and water quality.

In addition to monitoring resources at GGNRA, as discussed in chapter 4, under the draft plan/SEIS, the monitoring-based management strategy (MMS) would be implemented to encourage compliance with the dog walking regulation and would apply to all action alternatives. It will allow staff to monitor and record noncompliance as well as impacts to natural and cultural resources. Monitoring would inform park management and law enforcement when, where, and how to prioritize responses to noncompliance.

Concern ID:
CONCERN
STATEMENT:

31921
[Air quality could be significantly impacted under the proposed plan. Although car trips would be short, a majority of emissions occur during engine warm-up. There may be implications to air quality, as the local air basin is in nonattainment.](#)

Representative Quote(s): **Corr. ID:** 4666

Organization: *Not Specified*

Comment ID: 227792 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS acknowledges that the alternatives could affect visitation patterns (p. 23). For me it will cause me to drive every morning to walk my dog on the beach where I could previously walk. If I am unable to walk my dog on Ocean Beach, I will have to get into my car and drive to the LOLA to the north unless I have an abundance of time, which is not the case when walking my dog in the morning before work. This will result in 10 additional car trips per week - albeit short ones. But while the trips would be short, the majority of vehicle emissions occur during engine warm-up and represent new emissions under the action alternatives that would not be in the air under the existing conditions. And this is just for me - one person. The hundreds of people affected by this plan necessitate this analysis in the EIS. Some of the restrictions are so severe that it will force people to drive much further to obtain an comparable nature experience. Sites that are more remote that will prohibit dogs entirely, such as Muir beach, will result in even longer vehicle trips. A discussion of potential air quality impacts from the alternatives should be included.

Corr. ID: 4693

Organization: *Not Specified*

Comment ID: 210063 **Organization Type:** Unaffiliated Individual

Representative Quote: Another area of indirect effects is related to the increased amount of traffic that the Bay Area will experience if dog walkers ' private arid professional ' need to find alternative areas to give dogs their proper exercise. These indirect effects include traffic, air quality, traffic noise, climate change, etc. These effects need to be studied in the revised EIS.

Response:

Following the public comment period of the draft plan/EIS, the preferred alternative was modified to include additional dog walking access from adjacent neighborhoods. This would help reduce the number of visitors traveling to the park by vehicle.

As discussed in chapter 3, NPS conducted a survey in 2012 to measure customer satisfaction related to dog walking at the GGNRA sites and to collect 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. 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 would 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 detail in chapter 4.

Concern ID: 41749
CONCERN STATEMENT: GGNRA should be in accordance with other NPS sites in prohibiting off-leash dogs. It would be easier to enforce rules if all dogs were on-leash, as they are at other parks.

Representative Quote(s): **Corr. ID:** 2155 **Organization:** *Not Specified*
Comment ID: 200523 **Organization Type:** Unaffiliated Individual
Representative Quote: I like dogs, but do not want them roaming free in the National Parks. All dogs should be on a leash at all times while in the park! I've been approached by off-leash dogs numerous times in the park and have been growled at and barked at. It's not fair that I should be afraid of someone's pet while I'm enjoying a National Park. There are plenty of Dog Parks here in San Francisco - let's not turn our National Parks into National Dog Parks.

Corr. ID: 2531 **Organization:** *Not Specified*
Comment ID: 200766 **Organization Type:** Unaffiliated Individual
Representative Quote: In every other National Park I've ever visited (and that is quite a few of them), dogs are never allowed off of a leash. I was quite surprised to discover that they are allowed off of a leash in the GGNRA.

The point of course, is to protect the natural environment, wildlife, visitors, and the dogs themselves. So I don't understand why unleashed dogs are permitted in this particular park.

I don't want it to sound as if I don't like dogs. On the contrary... we are a dog owning family. And we take good care of our dog, and always work to keep her safe.

I would urge the NPS to keep the rules consistent across all parks, and require dogs to be leashed at all times. It's the safest thing for all involved.

Response: Please see chapter 1, Background for an explanation as to why the park is considering off-leash dog walking. Alternative B includes enforcement of NPS Regulation 36 CFR 2.15. Please see chapter 2, Alternative B for additional details.

Concern ID: 41750
CONCERN STATEMENT: Alternative E "Most Dog-Walking Access" is misleading because the areas open to dog walking under alternative E are less than those under alternative A. This needs to be clarified in the plan.

Representative Quote(s): **Corr. ID:** 4577 **Organization:** *Not Specified*
Comment ID: 209672 **Organization Type:** Unaffiliated Individual
Representative Quote: I have been walking my dog at Fort Funston for the last 15 years and am very familiar both with the terrain and with Fort Funston's history with regard to off-leash dog-walking over that period of time. Although I regret GGNRA's proposed dog-walking restrictions in many of the areas covered by the Management Plan, I am limiting my comments to the restrictions proposed for Fort Funston because I believe

that they cannot be justified by GGNRA's own research or objectives and will result in significant hardship for San Francisco's dog-owners.

Of the available alternatives, I believe that the NPS should adopt Alternative A (no action) with regard to Fort Funston because it does the most to preserve off-leash areas for dogs. In my opinion, Alternative E is misleadingly titled as providing "Most Dog-Walking Access" because in fact the areas open to dog-walking would be less than those under Alternative A. I urge the NPS to clarify this point to the public and to take the possibility of confusion into consideration when reviewing public support for Alternative E.

Response:

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 do not meet the purpose and need, particularly the goals of protecting park resources and increasing the safety of visitors, this alternative is more restrictive than the 1979 Policy. Please see chapter 2, Alternative E for more detail.

NL1300 – NEW LANDS: DESIRE OTHER ALTERNATIVE

Concern ID:

29388

**CONCERN
STATEMENT:**

Alternative E is preferred because it allows dogs and is less restrictive. No scientific studies were done on New Lands to justify banning dogs. Commenters believe that dogs pose less of a threat to wildlife and wildlife habitat than horses and that the numbers of dog walkers currently using New Lands (i.e., Rancho) is low. Dog walking is a historical use at some New Lands (i.e., Montara) and should be allowed to continue. Commenters have stated that there are no other areas on the San Mateo County Coast that allow dog walking. Alternative E allows for the benefits of visitors to get exercise with their dogs. ROLAs should be allowed within New Lands specifically in Rancho Corral. Suggested areas include the beach from Tamarind St to Farallone View School, or in the tract of land behind the Rancho stables. Designation of these areas should be considered based on sensitive habitat.

Representative Quote(s): **Corr. ID:** 449

Organization: *Not Specified*

Comment ID: 181813 **Organization Type:** Unaffiliated Individual

Representative Quote: I have read the GGNRA's plan for the Rancho Corral de Tierra area and feel that the best suited plan is alternative E. I truly feel that dogs who are under control, whether by voice or by leash, pose less a threat to the beautiful habitat we all enjoy than the horse riding community. In fact I am surprised to hear nothing about the impact that the Equestrians have on the trails.

Corr. ID: 477

Organization: *Not Specified*

Comment ID: 181818 **Organization Type:** Unaffiliated Individual

Representative Quote: I would like to strongly urge you to set aside an area of the Ranch Tierra land in Montara for off leash dog walking. Not all of it. Maybe the area from the beach to Tamarind St., behind Farralone View School.

Corr. ID: 1211 **Organization:** Montara Dog Group
Comment ID: 194858 **Organization Type:** Unaffiliated Individual
Representative Quote: I prefer Alternative E as it relates to Rancho - Most of the dog walkers use a small area immediately north of Montara and east of Hwy 1, approx 1 square mile or slightly less, as well as a small area in El Granada to the east of Coral Reef Ave. Such a small area of Rancho, as well as just a tiny percentage of the Bay Area GGNRA lands, that has been used for off-leash walking for decades, by me personally for 20 years. If we could at least keep these small areas to enjoy, as there are really no other areas on the San Mateo County Coastside.

Corr. ID: 4601 **Organization:** *Not Specified*
Comment ID: 209947 **Organization Type:** Unaffiliated Individual
Representative Quote: Area One is a tract bounded on the north by the Rancho stables and cultivated fields, on the west by the wetlands mandated as a part of the Devil's Slide Tunnel Project, and on the south and east by the unincorporated community of Montara. Area Two is the area accessed through Princeton-by-the-Sea a development within El Granada) and extending south and north behind that community. Areas One and Two of Rancho constitute ideal locations for ROLAs under any objective criteria. The area is not pristine wilderness. Environmental impacts are minimal - the dogs have been in these areas for the past forty years. The ecosystem has adapted. The area is open so that dogwalkers may see and avoid any situations with the potential for conflict. The use is historical. The majority of users are dogwalkers.

Response:

New Lands are no longer being analyzed in the draft plan/SEIS. Rancho Corral de Tierra is now analyzed as a separate site with a full range of alternatives. Please see chapter 2 for a description of the alternatives for Rancho Corral de Tierra and chapter 4 for impact analysis.

Concern ID:
CONCERN
STATEMENT:

29389
Alternative A is preferred. Current usage of New Lands (i.e., Rancho, Pacifica, Montara) including dog walking should continue to be allowed until scientific studies including long-term monitoring of site-specific conditions are done indicating that dog walking is harmful to park resources. Commenters believe that listed species have existed at the New Lands (Rancho Corral de Tierra) with dogs previously and that dog use of this area should be continued.

Representative Quote(s): **Corr. ID:** 3129 **Organization:** *Not Specified*
Comment ID: 202005 **Organization Type:** Unaffiliated Individual
Representative Quote: GGNRA's preferred alternative for the Rancho is unfair and not truly multi-use. Marin and San Francisco have off-leash and on-leash areas for dogs, San Mateo is being given none.

I am requesting that the GGNRA's preferred alternative for New Lands, including Rancho, be changed from alternative D (No dogs allowed) to a "No Change" alternative.
Current usage of the land, including dog walking, should continue to be allowed until scientific studies are done indicating that dog walking is

harmful to park resources.

A total ban on dogs is unacceptable. Creative multi-use solutions have not been considered. In Washington state, and Santa Cruz, CA, there are off-leash days, or off-leash hours in park areas. We are asking to continue to use approximately 100 acres with our dogs, out of 4200 acres.

Corr. ID: 3129 **Organization:** *Not Specified*
Comment ID: 202012 **Organization Type:** Unaffiliated Individual
Representative Quote: If there are any endangered plants or species in Rancho Corral de Tierra (Rancho) lands, they have survived half a century with hundreds of dogs using the area off leash. They are hearty enough to continue to survive with dogs continuing to use the area.

Response: New Lands are no longer being analyzed in the draft plan/SEIS. Rancho Corral de Tierra is now analyzed as a separate site with a full range of alternatives. Please see chapter 2 for a description of the alternatives for Rancho and chapter 4 for impact analysis.

Concern ID: 29390
CONCERN STATEMENT: Alternative B is preferred. On-leash dog walking should be allowed in New Lands, specifically Rancho Corral. All dogs should be on-leash for safety concerns, regular enforcement of the leash law, and stronger restrictions on professional dog walkers. Off-leash dogs should not be allowed because they are a safety hazard and reduce some visitors' experiences due to fear of off-leash dogs. Commenters also believe that off-leash dogs cause significant damage to trails, wildlife, and wildlife habitat.

Representative Quote(s): **Corr. ID:** 508 **Organization:** *Not Specified*
Comment ID: 181903 **Organization Type:** Unaffiliated Individual
Representative Quote: It is frustrating and sometimes scary to be put in these situations where dogs are loose and out of control, but I don't want to exclude dogs from Rancho Corral de Tierra entirely. It seems to me that the best compromise is to have all dogs on leashes to make it safer for all of us - other dog walkers, equestrians, kids, etc. and perhaps stronger restrictions on these "professional dog walkers" that have packs of dogs with them. 4-7 dogs on that many leashes with one person is still not safe since the person can easily be overpowered. It may also be necessary to have someone out there regularly enforcing the use of the leashes because many of these dog walkers will not comply.

Corr. ID: 3059 **Organization:** Golden Gate National Recreation Area
Comment ID: 201240 **Organization Type:** Unaffiliated Individual
Representative Quote: I do not agree with the New Lands prescription, which precludes dogs entirely from New Lands until opened in the Compendium. This puts the Park in a very difficult place when dealing with new communities. I propose that the Park approach the situation in a more realistic way to allow for the Park to make informed decisions without isolating entire communities. In new park lands with unorganized tangles of trail systems, designating "trails" versus "social trails" takes time--let alone

determining which designated trails should allow dogs and which shouldn't. Perhaps the language could read something like "Polygons shall be drawn inside new Park lands that designate where dogs are and are not allowed based on the current understanding of sensitive areas. In polygons allowing dogs, on-leash dogs shall be allowed on trail features within those trails, but not in any off trail areas within that polygon." This would be easier to sign and enforce, as many new sites have large numbers of redundant trails that are not worth signing independently AND allows for law enforcement officers and park users to understand which "trails" are allowed and are not.

Corr. ID: 3138

Organization: *Not Specified*

Comment ID: 220191 **Organization Type:** Unaffiliated Individual

Representative Quote: In addition, specifically for Rancho Corral de Tierra, a new land soon to be acquired by GGNRA, I strongly support on-leash dog walking ONLY. I hike regularly in this area and off leash dogs are a public safety hazard. On numerous occasions, I have nearly been attacked by off leash dogs. This is a very frightening experience and significantly interferes with my enjoyment of this beautiful land. As many dogs currently roam off leash on this property, the on-leash law will need to be strictly enforced once GGNRA begins to manage the land. I would not want to completely ban dogs from this property as many members of the dog walking community in this area do keep their dogs on leash and pick up after their dogs. However, in my 13 years of experience hiking in this area, voice control DOES NOT WORK for many dogs and should never be allowed on any of these lands. Aggressive dogs can cause significant safety hazards and limit the enjoyment of others who want to use the land without fear of being attacked by a dog. These off leash dogs also do significant damage to trails and foliage, scare and chase other natural animals in the habitat (birds, rabbits, etc) and generally create havoc in the entire natural environment.

Response:

New Lands are no longer being analyzed in the draft plan/SEIS. Rancho Corral de Tierra is now analyzed as a separate site with a full range of alternatives. Please see chapter 2 for a description of the alternatives for Rancho and chapter 4 for impact analysis.

Concern ID:

**CONCERN
STATEMENT:**

41753

The preferred alternative is too restrictive since it does not allow for any dog walking activities in New Lands. Commenters have stated that no scientific studies or long-term monitoring of site-specific studies were done on New Lands to justify banning dogs. Commenters believe that the park did not take into consideration the needs of the New Lands neighboring communities (i.e., Montara). Community members state that they will have to drive to areas that allow dogs whereas currently they can walk to areas in New Lands to walk their dog. Alternative D will have a negative impact on the visitor experience of visitors who currently enjoy dog walking in New Lands. Commenters believe that there is enough land currently at New Lands (i.e., Rancho) to allow opportunities for multiple user groups (i.e., dogs, horses, bicycles, and hikers) to enjoy this open space. Commenters are concerned that dogs were banned from New Lands because the adjacent San Francisco Water District Lands does not allow dogs.

Representative Quote(s): **Corr. ID:** 444 **Organization:** *Not Specified*
Comment ID: 181809 **Organization Type:** Unaffiliated Individual
Representative Quote: Preferred alternative should be E, not D

I have been a responsible dog owner for 20 years and walking my dog in Rancho de Tierra lands for many years. There are very few people accessing this land and most are with their dogs. There is simple no one, on a percentage basis, to bother. Please do not over regulate land that is suppose to be for the good of us all.

A total ban on dogs is not acceptable (or a complete ban on dogs is extreme).

Use this phrasing as opposed to specifying off leash, or on leash.

No scientific studies were done of Rancho lands to justify banning dogs.

Corr. ID: 1438 **Organization:** *Not Specified*
Comment ID: 199580 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to offer my reaction to the GGNRA Dog Management/EIS plan to exclude all dogs from "New Land" which would apply to Rancho Corral de Tierra property near Montara. I am whole-heartedly against this policy. I live in Montara and part of the charm to this wonderful small town is the ability to take my dog for long walks in open space. This is where I see my neighbors and chat with friends. After a long day, my dog and I take our daily walk to enjoy the scenery and relax a little. What I'm trying to convey is that though this area is a part of the expansive GGNRA, it's not a densely packed urban area. Rather it is a large part of our small community where bikers, walkers, equestrians and dog walkers have successfully co-existed without government oversight for many years. A ban on dogs is plainly unfair and out of touch with the needs of our community.

Corr. ID: 3729 **Organization:** Montara Dog Group, Sierra Club
Comment ID: 204223 **Organization Type:** Unaffiliated Individual
Representative Quote: This letter is asking for your support in allowing continued access for dogs in the Rancho Corral de Tierra, soon to be part of the GGNRA. The Montara Dog Group has encouraged responsible dog walking by starting a volunteer organization of people who remove dog waste from the mountain and by promoting leash protocols that respect all users in the park.

I encourage you to adopt Alternative E from the GGNRA Draft Dog Management Plan. This will allow continued on leash dog walking with off leash to be considered if certain criteria in the plan are met. The proposed Alternative prohibits dogs from an area where people have been walking them for 50 years.

Dogs do not harm the open space. [The Peninsula Humane Society Wildlife Expert supports this comment. There is no evidence collected by GGNRA to dispute it.]

GGNRA is a RECREATION area, and walking dogs is a very popular form of recreation.

There is a lot of room in the Corral--and all users should be considered. Many trails afford opportunities for dogs, horses, bicycles and hikers to enjoy this open space area.

As you proceed with revising and modifying the dog plan, please select an option that includes dogs. 1. Dogs have been walked in this area for 50 years, and there is no documented evidence of harm. This activity benefits many local users, and it is vital that we be allowed to continue this activity. 2. I am concerned about the "Compliance Based Management" system and would like more specific guidelines about dog walking. For example, if a dog is off leash and not doing harm, would this cause the rules to revert to the next stringent level? Is there any community input allowed on this? Who would enforce Compliance Based Management.

I hope you plan to allow dogs based on site specific information for the Rancho. I would also like to see the rules depend on documentation of actual effects of dogs on the Rancho.

Corr. ID: 4639

Organization: *Not Specified*

Comment ID: 208786 **Organization Type:** Unaffiliated Individual

Representative Quote: The New Lands in San Mateo County (where people have walked dogs off-leash for decades) need to be considered for off-leash recreation. The rationale that adjacent San Francisco Water District Lands don't allow dogs is hardly a reason to forbid off-leash recreation. The San Francisco Zoo is close to Fort Funston; the Zoo doesn't allow dogs; therefore, dogs shouldn't be at Fort Funston. Doesn't make much sense, does it?

Response:

Rancho Corral de Tierra transferred to GGNRA on December 9, 2011. Under current NPS management, dog walking on-leash is allowed on all trails in the two areas of the site that are open to dog walking, one near Montara and a second near El Granada, as shown in the Superintendent's Compendium (NPS 2012a). Voice control dog walking is not currently allowed at this site. The New Lands Analysis has been removed from the draft plan/SEIS and the Rancho Corral de Tierra site was added. The draft plan/SEIS now includes a detailed site-specific impacts analysis and suite of alternatives with both on-leash and off-leash dog walking opportunities, including a proposed ROLA under alternatives C and E. At Rancho, the preferred alternative allows on-leash dog walking and is based on the protection of resources in an area of contiguous habitat (McNee State Park, San Pedro Valley County Park and the San Francisco Watershed) as well as consistency with management in the adjacent State Park. The preferred alternative would allow on-leash dog walking on designated trails in the two areas open to dog walking: Montara and El Granada. Therefore, the preferred alternative would provide multiple visitor experiences.

NL1400 – NEW LANDS: SUGGEST CHANGE IN ALTERNATIVE

Concern ID:

29395

**CONCERN
STATEMENT:**

Provide clearer rules, more signage, improved vegetative barriers, financial development, and education about sensitive habitat areas, and outreach for new lands to help visitors to understand why their dogs should not be allowed in these areas. Commenters suggested that the park should work

with local animal welfare organizations, dog groups, and the community to ensure that dogs continue to have access to New Lands.

Representative Quote(s): **Corr. ID:** 3126 **Organization:** *Not Specified*
Comment ID: 201559 **Organization Type:** Unaffiliated Individual
Representative Quote: The acquisition of open space should not automatically mean those areas are rendered off limits to us. The NPS should tap the commitment of dog owner groups to educate people about the environment and to be watch dogs for sensitive areas.

Corr. ID: 4452 **Organization:** San Francisco SPCA
Comment ID: 208469 **Organization Type:** Non-Governmental
Representative Quote: In addition, not allowing any new lands to be available the dog owning community is simply unfair and unwarranted. We recommend the GGNRA work with and involve local animal welfare organizations, dog groups and the community to ensure that dog guardians continue to have access to these recreational park lands.

Corr. ID: 4472 **Organization:** *Not Specified*
Comment ID: 208707 **Organization Type:** Unaffiliated Individual
Representative Quote: I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, financial development, education and outreach as part of the overall program.

Response: New Lands are no longer being analyzed in the draft plan/SEIS. Rancho Corral de Tierra is now analyzed as a separate site with a full range of alternatives. Please see chapter 2 for a description of the alternatives and chapter 4 for impact analysis. Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

Concern ID: 31334
CONCERN STATEMENT: On new lands and particularly Rancho Corral, dogs should be allowed on currently available on-leash areas, and some off-leash areas should be provided.

If the preferred alternative is chosen, a compendium should be issued stating that dogs will be allowed in certain areas.

Representative Quote(s): **Corr. ID:** 4402 **Organization:** *Not Specified*
Comment ID: 204899 **Organization Type:** Unaffiliated Individual
Representative Quote: I spoke with Superintendent Dean at the public forum in Pacifica, and understood him to say that he plans to issue a compendium allowing for areas of on-leash dogs soon after GGNRA controls the Rancho. He also stated that he is open to working with other organizations to establish an off-leash area. While I appreciate his stated intention, I would prefer that the initial Dog Management Plan be amended to allow for a more balanced alternative, allowing on-leash dogs in the areas that are currently frequently used by dogs and their owners, and allowing

for off-leash areas as well. Should the preferred alternative become part of the final plan, I respectfully request that Mr. Dean immediately issue a compendium stating that dogs will be allowed in certain areas.

Response:

New Lands are no longer being analyzed in the draft plan/SEIS. Rancho Corral de Tierra is now analyzed as a separate site with a full range of alternatives. Please see chapter 2 for a description of the alternatives and chapter 4 for impact analysis.

Concern ID:

41757

**CONCERN
STATEMENT:**

Commenters were concerned that the restriction of dogs in the Rancho Corral de Tierra lands would limit access to McNee State Park, and increase parking issues, and require walking along a busy road. The current trailhead in Montara for Rancho is not well functioning, and the proposed options would result in a loss of access for homeowners and the fire department.

Representative Quote(s):

Corr. ID: 484

Organization: Montara Dog Group

Comment ID: 181824 **Organization Type:** Unaffiliated Individual

Representative Quote: Montara residents will be forced to drive to small parking lots at McNee Ranch or Montara Beach, and cross busy Highway 1 with their dogs, in order to access McNee Ranch, formerly a 10 minute walk through Rancho. Even more dangerous, Montara residents may elect to walk along Hwy 1 for 1/4 mile (there is virtually no shoulder on this stretch of highway) to get to McNee Ranch.

Corr. ID: 504

Organization: *Not Specified*

Comment ID: 181894 **Organization Type:** Unaffiliated Individual

Representative Quote: Does it make sense, and is it safe, to force dog owners who want to access McNee State Park to either drive, trying to find parking on the highway, or walk half a mile on Highway 1, rather than walk across the old railroad grade or old roadway and trail from Montara?

Corr. ID: 3930

Organization: *Not Specified*

Comment ID: 205796 **Organization Type:** Unaffiliated Individual

Representative Quote: The current trailhead in Montara is not workable given it is in the middle of a residential area and next to a school. There has been strong opposition to the LeConte trailhead already and Second Street is semi-private, narrow, unimproved dirt road. If individuals parked cars at either of these locations it would cut off fire department access to the homes and the Rancho.

Corr. ID: 4262

Organization: *Not Specified*

Comment ID: 209148 **Organization Type:** Unaffiliated Individual

Representative Quote: I am concerned that it will not be safe to force dog owners who want to access McNee State Park to walk half a mile on Highway 1 rather than walk across the old railroad grade or old roadway and trail from Montara. I have not seen reports that indicate that the pads of dog's feet are more damaging to the terrain than horse's hoofs, hiker's boots or mountain bike's tires

Response:

At Rancho Corral de Tierra, the preferred alternative allows on-leash dog walking and is based on the protection of resources in an area of contiguous habitat (McNee State Park, San Pedro Valley County Park and the San Francisco Watershed) as well as consistency with management in the adjacent State Park. The preferred alternative would allow on-leash dog walking on designated trails in the two areas open to dog walking: Montara and El Granada. Therefore, the preferred alternative would provide multiple visitor experiences.

NL1500 – NEW LANDS: QUESTION DEFINITION OF NEW LANDS

Concern ID:

29397

CONCERN STATEMENT:

Commenters expressed concern that there is no support to treat New Lands differently, and that New Lands should be treated as existing lands. Some expressed concern that the plan for New Lands is inconsistent with the granting of new lands to the NPS, specifically to the definition of recreation.

Representative Quote(s): **Corr. ID:** 2033

Organization: *Not Specified*

Comment ID: 193265 **Organization Type:** Unaffiliated Individual

Representative Quote: How is this plan consistent or inconsistent with the granting of lands to the NPS?

What is the definition of "recreation" as it was intended in the land grants to the NPS?

Corr. ID: 4088

Organization: *Not Specified*

Comment ID: 208351 **Organization Type:** Unaffiliated Individual

Representative Quote: And I think that all of the sites in San Mateo County have not been adequately analyzed, as there is no legal basis for what you call "New Lands". These "New Lands" in San Mateo County (and Marin County too) should be treated as "existing lands". There is no case law or anything in the GGNRA's compendiums or the current GGNRA General Management Plan to support your conclusions about treating these lands differently.

Response:

New Lands are no longer being analyzed in the draft plan/SEIS. Rancho Corral de Tierra is now analyzed as a separate site with a full range of alternatives. Please see chapter 2 for a description of the alternatives and chapter 4 for impact analysis.

Concern ID:

29399

CONCERN STATEMENT:

Commenters have stated that the action to close New Lands to dog walking conflicts with the park's enabling legislation and with Management Policies (2006) for determining uses and land protection plans. The "closed until open" proposal would violate the park's statutory obligation to preserve and maintain recreational uses, violate sound land planning with the community, and violate NEPA by prejudging alternatives before site-specific and environmental review.

Representative Quote(s): **Corr. ID:** 4089 **Organization:** Crissy Field Dog Group
Comment ID: 208377 **Organization Type:** Unaffiliated Individual
Representative Quote: 4. Improper Treatment of New Lands
The proposed action to close new lands to dog walking access conflicts with the GGNRA Enabling Legislation (PC 92-589) and with National Park Service Management Policies (2006) for determining uses and land protection plans. GGNRA is required to consider new lands in the same way that it considers uses and land protection measures on lands within GGNRA.

The unprecedented "Closed until open" proposal would violate GGNRA's statutory obligation to preserve and maintain recreational uses, violate sound land planning with the community, and violate NEPA by prejudging alternatives before site-specific public and environmental review. There is no basis for treating new lands differently than existing lands under NPS regulations and policies

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 200895 **Organization Type:** Non-Governmental
Representative Quote: The unprecedented "Closed until open" proposal would violate GGNRA's statutory obligation to preserve and maintain recreational uses, violate sound land planning with the community, and violate NEPA by prejudging alternatives before site-specific public and environmental review. There is no basis for treating new lands differently than existing lands under NPS regulations and policies. Furthermore, there is no such policy in the existing GGNRA General Management Plan and Compendium.

Corr. ID: 4626 **Organization:** Marin Unleashed
Comment ID: 264279 **Organization Type:** Non-Governmental
Representative Quote: The unprecedented "Closed until open" proposal would violate GGNRA's statutory obligation to preserve and maintain recreational uses, violate sound land planning with the community, and violate NEPA by prejudging alternatives before site-specific public and environmental review.

Response: New Lands are no longer being analyzed in the draft plan/SEIS. Rancho Corral de Tierra is now analyzed as a separate site with a full range of alternatives. Please see chapter 2 for a description of the alternatives and chapter 4 for impact analysis.

Concern ID: 29400
CONCERN STATEMENT: [The New Lands definition confuses the issues by blending areas which have neither environmental, ecological, historical, or recreational uses in common \(i.e., portions of Marin and coastal San Mateo County\).](#)

Representative Quote(s): **Corr. ID:** 4601 **Organization:** *Not Specified*
Comment ID: 209942 **Organization Type:** Unaffiliated Individual
Representative Quote: None of the "data" offered in support of the GGNRA's position is specifically relevant to the "New Lands", as defined in the DMP/EIS.

The "New Lands" definition itself is designed to obfuscate the issues by amalgamating areas which have neither environment, ecology, history, or recreational uses in common - i.e. portions of Marin and coastal San Mateo County.

Response: New Lands are no longer being analyzed in the draft plan/SEIS. Rancho Corral de Tierra is now analyzed as a separate site with a full range of alternatives. Please see chapter 2 for a description of the alternatives and chapter 4 for impact analysis.

OB1300 – OCEAN BEACH: DESIRE OTHER ALTERNATIVE

Concern ID: 29349
CONCERN STATEMENT: [Alternative E provides good protection to visitors and the environment at Ocean Beach, and should be the alternative chosen for this site.](#)

Representative Quote(s): **Corr. ID:** 408 **Organization:** *Not Specified*
Comment ID: 181574 **Organization Type:** Unaffiliated Individual
Representative Quote: To protect the environment and pedestrians like me, please enforce leash requirements on Ocean Beach as described in the Preferred Alternative or Alternative E. Thank you.

Corr. ID: 1521 **Organization:** *Not Specified*
Comment ID: 190685 **Organization Type:** Unaffiliated Individual
Representative Quote: Ocean Beach

Plan E is the only reasonable compromise. Then enforce it -- and fine people who break the law.

However, it seems to me that the current plan is restrictive enough + requires no additional restrictions.

Corr. ID: 4585 **Organization:** *Not Specified*
Comment ID: 210009 **Organization Type:** Unaffiliated Individual
Representative Quote: We are very disappointed that the GGNRA prefers Alternative C, which would prohibit dogs from Ocean Beach south of Stairwell 21.

We support the year-round leash law proposed in Alternative E, which would protect the habitat and migrating shorebirds, and allow responsible dog owners to continue to use Ocean Beach.

Response: Alternative E was not selected as the preferred alternative for Ocean Beach. The preferred alternative would allow for multiple visitor opportunities. Please see chapter 2, Preferred Alternative for Ocean Beach for additional rationale.

Concern ID: 29350
CONCERN STATEMENT: [Alternative D would be the most beneficial alternative, as commenters did not support any voice control, and felt that this option would provide snowy plovers more opportunity for successful nesting seasons.](#)

Representative Quote(s): **Corr. ID:** 1544 **Organization:** *Not Specified*
Comment ID: 190728 **Organization Type:** Unaffiliated Individual
Representative Quote: Ocean Beach

No dogs on walkways, on beaches with possible exception for northern end at strwell 21

Voice control anywehre is a NO-NO

Prefer 15D but can live w/15C

Corr. ID: 3701 **Organization:** Sierra Club, San Francisco Bay Chapter

Comment ID: 202229 **Organization Type:** Unaffiliated Individual

Representative Quote: Impacts to Listed Species

We were disappointed that you did not more fully emphasize the Lafferty studies at Sands Beach, Coal Oil Point Reserve in Santa Barbara, California. This study demonstrated that human recreation on beaches and particularly off-leash dogs pose a significant problem for the viability of nesting snowy plovers. In fact, no snowy plovers had successfully fledged on this beach for 30 years. A management regime that included a physical boundary around a proposed nesting area and the prohibition of off-leash dogs resulted in the success of snowy plover nesting after initiation of that regime.

Thus, in determining appropriate levels of dog use in GGNRA particular attention must be paid to those areas that provide listed species habitat. Ocean Beach and Crissy Field are two areas that support the listed Western snowy plover. The Lafferty research demonstrates that with a significant reduction in disturbance, especially from off-leash dogs, snowy plovers can successfully nest on these beaches and thus increase the total snowy plover population. We believe that it is incumbent upon the NPS to implement such management regimes at these two sites, and any others that support listed species, in order to comply with the federal ESA obligations cited above.

This would entail the prohibition of off-leash dogs on Ocean beach and Crissy Field. Alternative C does provide for some of this protection but we believe it is inadequate. Alternative D would provide the greatest opportunity for the Western snowy plover to have successful nesting seasons at these beaches, and others in the GGNRA.

Corr. ID: 4315 **Organization:** State of California Department of Fish and Game

Comment ID: 209392 **Organization Type:** State Government

Representative Quote: 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.

Response: Alternative D was not selected as the preferred alternative for Ocean Beach. The preferred alternative would allow a ROLA on the beach north of Stairwell #21; however no dog walking would be allowed within the SPPA in order to provide maximum protection of the nesting birds. Please see chapter 2, Preferred Alternative for Ocean Beach for additional rationale.

Concern ID: 29351
CONCERN STATEMENT: The chosen alternative should have dogs off the beach during the nesting season for birds, but allow them on the rest of the year, as is consistent with alternative A. The current restrictions should be continued.

Representative Quote(s): **Corr. ID:** 907 **Organization:** *Not Specified*
Comment ID: 191279 **Organization Type:** Unaffiliated Individual
Representative Quote: I urge you to maintain Fort Funston and Ocean Beach as off-leash dog parks. They have been used as such for many years and have come to be relied upon by dog owners, such as myself for our use and enjoyment. There are already plenty of parks where off-leash is not allowed and not an option and personally, I am fine with this. Please leave things status quo.

Corr. ID: 1565 **Organization:** *Not Specified*
Comment ID: 190768 **Organization Type:** Unaffiliated Individual
Representative Quote: Ocean Beach: NO CHANGE to current laws

This exemplifies compromise, as there are clear barriers for on leash and off-leash activity. People who do not want to be near dogs that are off leash can visit other areas that are restricted. People with dogs can enjoy off leash activity in a very small area.

Focus on enforcement fo current law rather than changing it. I am on the beach every day, 2x a day, and I rarely see park rangers.

Corr. ID: 2230 **Organization:** *Not Specified*
Comment ID: 200846 **Organization Type:** Unaffiliated Individual
Representative Quote: I am requesting that the GGNRA adopt the 1979 Pet Policy to control off-leash dog walking on Ocean Beach, Fort Funston, and Crissy Field because it is more balanced, longstanding, supports recreation, collaboration and shared use.

Response: Restricting dog walking within the SPPA year round would allow a larger beach area for a no-dog experience. It would also ensure greater compliance

with the regulation by reducing public confusion over seasonal closures.

Concern ID: 31803
CONCERN STATEMENT: Commenters support alternative B for Ocean Beach. Dogs should be kept on-leash as off-leash dogs can be dangerous and cause safety issues.

Representative Quote(s): **Corr. ID:** 2087 **Organization:** *Not Specified*
Comment ID: 200519 **Organization Type:** Unaffiliated Individual
Representative Quote: I urge you to require all dogs on Ocean Beach be kept on leash at all times. Voice control has proven not to be effective.

I have run and walked on Ocean Beach for over 40 years. In recent years there have been an increased number of unleashed dogs on the beach. I have been bitten by an unleashed dog while running on Ocean Beach. When running with friends who have a dog on leash, their dogs have been attacked by unleashed dogs. Each of these behaviors is natural of dogs. By their very nature and breeding, they attack running prey, in this case me. A leashed dog appears to be in a weakened position and is fair game for an unrestrained dog.

Often the owners of unleashed dogs are hostile when I ask them to control their dog. When I ask them to restrain their dog, they are often openly hostile. I have been called crazy, cursed at, and given the "finger".

I should not have to take a subservient position to dogs. They should all be required to be on leash, not just voice control, while on Ocean Beach

Corr. ID: 2468 **Organization:** *Not Specified*
Comment ID: 200800 **Organization Type:** Unaffiliated Individual
Representative Quote: Please, don't allow dogs to run free on Ocean Beach!

Response: Alternative B was not selected as the preferred alternative for Ocean Beach. The preferred alternative allows multiple visitor experiences including a no-dog experience on the beach. Please see chapter 2, Preferred Alternative for Ocean Beach for additional rationale.

OB1400 – OCEAN BEACH: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29353
CONCERN STATEMENT: Enforcement - An alternative for Ocean Beach must include high levels of enforcement if it is to be successful. Better enforcement would help to prevent confusion about the current rules, and would improve the situation. Commenters noted that the areas designated as off-leash or on-leash need better signage, expressed experiences of being confused at what areas are currently open to off-leash dogs, and expressed that this would be a problem in the future without adequate signage.

Representative Quote(s): **Corr. ID:** 1680 **Organization:** member of public
Comment ID: 200272 **Organization Type:** Unaffiliated Individual
Representative Quote: The birds are continuously being harrassed by

unleashed dogs at Ocean Beach in the protected areas. I would contend that increased limitations on access is needed but THEY MUST BE ENFORCED diligently. Please step up enforcement of all regulations throughout the beach, not just in the parking lots. I see empty alcohol bottles regularly and under-aged drinking often. An un-enforced law or regulation promotes disdain for law in general and is counterproductive.

I saw today alone in 15 minutes over 10 different dogs off leash in the protected area. I remind folks that dogs should be on leash; this is not always well received. It seems like fining first or repeat offenders could easily generate enough revenue to pay for further law enforcement.

Corr. ID: 2022 **Organization:** *Not Specified*
Comment ID: 193235 **Organization Type:** Unaffiliated Individual
Representative Quote: Ocean Beach should have some sign or marker along beach (not just at stairwell) indicating boundary between on-leash & off-leash areas

Corr. ID: 2924 **Organization:** *Not Specified*
Comment ID: 203398 **Organization Type:** Unaffiliated Individual
Representative Quote: I can only speak to the part of the plan that relates to Ocean Beach as that is my neighborhood. I would have no problem with the current seasonal restrictions if they were enforced and people followed them, but they are not. It is rare to see dogs on leash in the designated area during snowy plover nesting season and most of the dogs running around are not voice controlled and many chase after the birds, I have even witnessed dogs catching snowy plovers and killing them a couple times.

Most dog owners either do not see the poor signage and are not aware of the seasonal leash law or intentionally ignore it, and are rude and entitled in their response if you nicely mention the law to them and the reasons for it.

I have only twice seen people patrolling the beach informing dog owners they need to have dogs on leash in the year and a half I've lived there, this is obviously not sufficient and dog owners should be fined if they do not comply, otherwise what's the point of having the law at all. Making the on leash area a permanent rather than seasonal law will not help this issue if it is not stringently enforced and better marked. Therefore I would recommend leaving the current seasonal law in place with more active enforcement and signage, including signage posted at all the beach access points along great highway as well as posted along the beach at regular intervals. That is what is needed.

Restrictions on dog walking and off leash areas are not going to be effective if they are not being enforced and there is no incentive for dog walkers/owners to follow them (or deterrent against breaking them,) this is as true of the current restrictions as it is of potentially more stringent ones. I suspect you will find that increasing many of these restrictions in the GGNRA is not what is needed, what is necessary is enforcement of the existing ones.

Corr. ID: 3157 **Organization:** *Not Specified*
Comment ID: 202885 **Organization Type:** Unaffiliated Individual
Representative Quote: At Ocean Beach, please mark Stairway 21 more clearly. We have no idea at all where it's located.

Response: Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

Concern ID: 29354
CONCERN STATEMENT: ROLA - Commenters stated that it will be difficult to access the ROLA for those living at the southern end of the beach. There should be a large area left for off-leash dog walking at Ocean Beach, and/or the entire beach should be off-leash as it is currently. Suggestions for off-leash areas included the Great Highway dune and beach area, area south of Sloat Boulevard, north of stairwell 21, and through parts of the current SPPA between Lincoln and Sloat Boulevard. Many commenters suggested using fences around ROLAs. Suggestions included placing a fence along the south border of the ROLA, and placing fencing around Snowy Plover Protection Area particularly around plover nests in the dunes and along the cliff.

Representative Quote(s): **Corr. ID:** 663 **Organization:** *Not Specified*
Comment ID: 182589 **Organization Type:** Unaffiliated Individual
Representative Quote: I would like the Great Hwy dunes area open for off leash walking. The May-July off leash allowance seems unnecessary (what are the statistics of the snowy plover recovery??- I have never seen one) . What I do wonder is why the Ocean Beach area by the Cliff House is an off leash area. That is the area where people park and enjoy the beach. The area between Lincoln & Sloat is not as populated with people w/o dogs. Why not make that area off leash? That way the open beach can be used by folks w/o dogs. If you allow voice control along the Great Hwy, that would be a good thing.

Corr. ID: 1585 **Organization:** *Not Specified*
Comment ID: 190810 **Organization Type:** Unaffiliated Individual
Representative Quote: Re: Ocean Beach - preferred alternative: Dogs and their owners should be allowed off-leash south of Sloat Blvd to Ft. Funston. This area is sparsely used by beach-goers and the bluffs are crumbling away & subject to much man-made intervention (rip rap-concrete, etc) to shore up the cliff. Further south the cliff swallows are up on the cliffs, not on the beach, so dogs do not disturb them. I believe this area is not populated by snowy plovers, and I doubt dogs could cause more destruction of the species than man has.

Corr. ID: 1682 **Organization:** *Not Specified*
Comment ID: 191080 **Organization Type:** Unaffiliated Individual
Representative Quote: Please allow Ocean Beach to be the recreational playground for "our best friends" - at the very minimum - allow the stretch from Lincoln to the Cliff House to be off leash friendly.

Corr. ID: 2905 **Organization:** *Not Specified*
Comment ID: 202642 **Organization Type:** Unaffiliated Individual
Representative Quote: Ocean Beach - I support the Preferred Alternative for Ocean Beach. To improve upon the Preferred Alternative, I suggest using symbolic fencing and adequate signage 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, I suggest 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.

Corr. ID: 3112 **Organization:** *Not Specified*
Comment ID: 201520 **Organization Type:** Unaffiliated Individual
Representative Quote: I have reviewed the proposed restrictions for Ocean Beach, and find them draconian. It is an enormous beach that is largely unused most days of the year, and it seems to me to be an overreach to shut practically the entire beach down to off leash dogs. I am in favor of protecting the plover, but as I understand it, the real issue is protecting their nests in the dunes. If that is indeed the case, why don't you just cordon off the dunes, or restrict access to that part of the beach? I think most people who want to have their dogs off leash mostly want to do so along the tideline so that their dogs can swim.

Corr. ID: 3701 **Organization:** Sierra Club, San Francisco Bay Chapter
Comment ID: 220539 **Organization Type:** Unaffiliated Individual
Representative Quote: Barriers around ROLAs.

The Lafferty study was quite clear that signage alone was inadequate to instill public compliance with a prohibited access area. On the other hand, a minimal fence in combination with a docent program was quite successful. The minimal fence alone was also inadequate, although better than the signage alone. This demonstrates that the management regime for ROLAs proposed in all alternatives is doomed to failure. Without a physical barrier and some human presence, be it educational docents or enforcement staff, the boundaries of a signed-only ROLA will be ignored. (We argue that since a barrier and docent were necessary to keep off-leash dogs out of an area, it is likewise necessary to have barriers and docents to keep off-leash dogs in a ROLA.)

Response:

The preferred alternative would allow off-leash dog walking within a large ROLA on the beach north of Stairwell #21. ROLAs would not be established within other areas of Ocean Beach due to 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 ID:
CONCERN
STATEMENT:

29355
Commenters suggested several time-of-day use restrictions and seasonal restrictions to accommodate different user groups at Ocean Beach.

Suggestions included restricting dog walking on Ocean Beach during the summer months and allowing off-leash dog walking in the morning hours. Another suggestion was that the beach should not be closed year-round to dogs on- and off-leash for protection of the snowy plover, but should be open when the plovers are not present, and should be on-leash only during the times when they are present.

Representative Quote(s): **Corr. ID:** 115 **Organization:** *Not Specified*
Comment ID: 181990 **Organization Type:** Unaffiliated Individual
Representative Quote: I for one am confused on the rational for suggesting all of Ocean Beach should be closed to dogs on and off leash. If the rational is to protect the snowy plover, why then is the beach not open in the summer months when the snowy plover is gone? Also, why not just keep it as is as an on leash only area during the months the bird is around?

Corr. ID: 1663 **Organization:** *Not Specified*
Comment ID: 191062 **Organization Type:** Unaffiliated Individual
Representative Quote: What about -->

- Making one of the sites like Ft Funston be a destination "center of excellence" of dog mgmt. Bring in corporate america to help run in like curry village with 41 Billion spent on pets we can find someone.

-Create time restrictions in densely populated areas like Chrissy Field - weekends before 9 after 4.

restrict Ocean Beach during the summer time - have it people only like dog beach in San Diego.

With signs and clear rules "enforcement" will be just as difficult or easy as the current proposals.

Corr. ID: 3115 **Organization:** *Not Specified*
Comment ID: 201524 **Organization Type:** Unaffiliated Individual
Representative Quote: I think that for Ocean Beach and Crissy Field a great compromise could be the time of day. I know there are a lot of children and/or people who are afraid of dogs. They deserve to enjoy the parks too. But if you have a dog at the beach at 7am who cares? The dogs actually help keep the area safe. I have been there at 6:30 in the morning when it is so beautiful and quite, along side other caring dog owners and the joggers, only to find a few partiers or homeless on the beach. Maybe having the beaches off leash before 11am would be a solution?

Corr. ID: 3921 **Organization:** *Not Specified*
Comment ID: 205718 **Organization Type:** Unaffiliated Individual
Representative Quote: Make Ocean Beach seasonal or timed access. Either open to off leash Nov - May or before 10am. The weather is what dictates visitors at this beach.

Response: Time of day restrictions can be difficult to enforce; however, this management concept will still remain an option for dog management in the

future. Please see chapter 2, National Park Service Preferred Alternative for additional information on time of use restrictions.

Concern ID:
CONCERN
STATEMENT:

29356

On-Leash - Commenters suggested having on-leash dog walking available, including on North Ocean Beach, from the Cliff House to the dunes, all along the dunes, south of Sloat Blvd, and north of Stairwell 21 due to visitor congestion and wildlife protection. Other commenters believed that dogs should not be allowed at Ocean Beach at all. Suggestions for no-dog areas included south of the Cliff House, north of the beach chalet (Stairwell 19), or the entire beach.

Representative Quote(s): **Corr. ID:** 417

Organization: *Not Specified*

Comment ID: 181590 **Organization Type:** Unaffiliated Individual

Representative Quote: Ocean Beach (proposed Alternative C): The current proposal requires dogs on leash throughout all of Ocean Beach, except south of Sloat where they're banned. Instead, I'd suggest North Ocean Beach (from the Cliff House to the dunes) require dogs be on leash, as this is the highest traffic area of the beach, and the most likley destination for tourists. The area along the dunes, which is less traveled, should be designated as off-leash. Again, if would effectively encourage dog owners to use that portion instead. South of Sloat should require dogs be leashed, perhaps banned during mating season (but only during mating season).

Corr. ID: 781

Organization: *Not Specified*

Comment ID: 185830 **Organization Type:** Unaffiliated Individual

Representative Quote: Please restrict dogs to on-leash only North of Stairwell 21 at Ocean Beach.

Corr. ID: 1626

Organization: *Not Specified*

Comment ID: 190934 **Organization Type:** Unaffiliated Individual

Representative Quote: If you wish to have an area for access by people without any presence of dogs at all, I recommend the area just south of the Cliff house and north of the beach Chalet (@ Stairwell 19) as such area is clearly seperable and more frequently visited by tourists.

In no case should the GGNRA block off the ability of the park users with dogs to take a long beach walk from the stairwell 21 anex south to the around Sloat.

Corr. ID: 4269

Organization: *Not Specified*

Comment ID: 209095 **Organization Type:** Unaffiliated Individual

Representative Quote: I completely support placing tighter restrictions on dogs using Golden Gate National Recreation Areas. I believe they are needed to protect the snowy plover and all wildlife in these areas. Dogs should be kept out of parts of San Francisco's Crissy Field, Ocean Beach and Fort Funston, and I agree with Michael Lynes that the proposed rules don't go far enough.

Corr. ID: 4659 **Organization:** *Not Specified*
Comment ID: 209067 **Organization Type:** Unaffiliated Individual
Representative Quote: As to Ocean Beach, I have long thought that it would be appropriate to have some small area where there are no dogs at all to accommodate park visitors who want a beach experience but are fearful of dogs. I think the far north most part of Ocean Beach near the Cliff House would be the logical place to have an off limits area of around 100 yards. That would accommodate the interest without breaking up the continuity of the cherished experience of taking a long hike or run on the remainder of the beach.

Response: The preferred alternative allows for multiple visitor opportunities including on-leash and off-leash dog walking and a no-dog experience. Please see chapter 2, Preferred Alternative for Ocean Beach for additional rationale on the locations of these areas.

OV1300 – OAKWOOD VALLEY: DESIRE OTHER ALTERNATIVE

Concern ID: 29237
CONCERN STATEMENT: Commenters support alternative A at Oakwood Valley because there is no justification for the changes proposed, it is a prime recreational area used by park visitors, and because of the off-leash areas it provides to dog walkers and/or because few non-dog walking people use the area

Representative Quote(s): **Corr. ID:** 1573 **Organization:** *Not Specified*
Comment ID: 190785 **Organization Type:** Unaffiliated Individual
Representative Quote: The dog use on Alta and Oakwood Valley is the PRIME recreational use of these trails, no question about it - 75% of persons using it have dogs (off leash mostly, not including commercial walkers). Despite all of my time spent off trail (in Mission Blue habitat) only once have I ever encountered a dog that shouldn't have been there. 99.99999% stick to the trail/road.

On the basis of my experience (I am a wildlife ecologist, by profession) it appears to me that the decision to change the current dog policy on Oakwood Valley and Alta Ave trails/fire roads is based on abstractions and no real data. It is a recreational area and people recreate on those trails walking with their dogs (off leash) - my survey 75% (not including commercial walkers) of users. There is also plenty of wildlife.

I do not support allowing dogs (on leash) between Oakwood Valley pond and Alta. This would be consistent policy for use of Alta and Oakwood Valley. Therefore, Alternative A

Corr. ID: 2116 **Organization:** *Not Specified*
Comment ID: 193382 **Organization Type:** Unaffiliated Individual
Representative Quote: I walk my dogs on Oakwood Trail daily. Most of the people on this trail have dogs and most unleashed. There are very few no leash trails, pls do not take this away from all of us responsible dog owners. Dogs need off leash exercise and so do their owners!

Corr. ID: 2119 **Organization:** *Not Specified*
Comment ID: 193393 **Organization Type:** Unaffiliated Individual
Representative Quote: Oakwood Valley loop needs to remain the way it is - free for dogs to run off-leash. Very few non-dog people use it.

Response: Alternative A was not selected as the preferred alternative for Oakwood Valley. ROLAs would not be established at Oakwood Valley due to safety concerns and impacts to sensitive habitat. Please see chapter 2, Preferred Alternative for Oakwood Valley for additional rationale.

Concern ID: 29238
CONCERN STATEMENT: Commenters support alternative D; it would have the least impact of all alternatives on vegetation.

Representative Quote(s): **Corr. ID:** 4315 **Organization:** State of California Department of Fish and Game
Comment ID: 209388 **Organization Type:** State Government
Representative Quote: 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.

Response: Alternative D was not selected as the preferred alternative for Oakwood Valley. The preferred alternative would allow for both an on-leash dog walking and no-dog experience while still protecting sensitive habitat. Please see chapter 2, Preferred Alternative for Oakwood Valley for additional rationale.

Concern ID: 29240
CONCERN STATEMENT: Commenters support alternative B because of the absence of the fenced ROLA at Oakwood Valley which would not create adverse impacts to wildlife.

Representative Quote(s): **Corr. ID:** 4265 **Organization:** Kellner and Associates
Comment ID: 209118 **Organization Type:** Unaffiliated Individual
Representative Quote: OAKWOOD VALLEY FIRE ROAD AND TRAIL. Alternative B would be better for wildlife than Alternative C because of the absence of fencing proposed along both sides of Oakwood Valley Trail. A fence would prevent wildlife from crossing from one side of the trail to the other side thereby providing a barrier to the movement of wildlife. Especially for small areas of habitat, such as the Oakwood Valley area, it is important that wildlife have access to as large an area as possible and no area should be precluded from use by fencing. Dogs should be on leash along the Oakwood Valley Fire Road and Trail.

Response:

Alternative B was not selected as the preferred alternative for Oakwood Valley; however, the preferred alternative was modified to eliminate the ROLA due to safety concerns, impacts to the visitor experience and protection of sensitive habitat. Please see chapter 2, Preferred Alternative for Oakwood Valley for additional rationale and the information on Alternative Elements Eliminated from Further Consideration.

OV1400 – OAKWOOD VALLEY: SUGGEST CHANGE IN ALTERNATIVE

Concern ID:

29241

CONCERN

STATEMENT:

NPS should allow dogs on Alta Trail to connect with the Oakwood Valley Fire Road; there is a preference for dog walking loops rather than short out and back trails.

Representative Quote(s):

Corr. ID: 1308

Organization: *Not Specified*

Comment ID: 195046 **Organization Type:** Unaffiliated Individual

Representative Quote: I also noticed that in some of the alternatives, you allow no dogs on the link to Alta trail portion where dogs are allowed. Please dont do this - it is great to able to be take a nice loop hike, and when you eliminate linkages between dog allowed areas, it takes a lot of fun out of it.

Corr. ID: 3934

Organization: 3rd Supervisorial District of the County of Marin

Comment ID: 205852 **Organization Type:** County Government

Representative Quote: 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.

Corr. ID: 4005

Organization: *Not Specified*

Comment ID: 206273 **Organization Type:** Unaffiliated Individual

Representative Quote: I support the proposal for on-leash access on these fire roads, and the 2 trails that provide access to them:

The fire roads:

Coastal Trail from Muir Beach to Coastal Fire Road to Coyote Ridge Trail (a fire road) to Miwok Trail (a fire road);

Miwok Trail from Highway 1 to Coyote Ridge Trail;

Miwok Trail from Tennessee Valley Road to Coyote Ridge Trail;

Marin Drive from Tam Valley to the Miwok Trail;

County View Road from Tam Valley to the Miwok Trail;

Tennessee Valley Road (or the adjacent Rhubarb Trail (Marin County

trail)) to Oakwood Valley Fire Road;
Oakwood Valley Fire Road from Tennessee Valley Road to Alta Trail (a fire road);
Alta Trail from Donahue Avenue in Marin City to Rodeo Valley Trail;
Pacheco Fire Road from Marin City to Alta Trail;
Orchard Fire Road from Marin City to Alta Trail;
Rodeo Avenue from Highway 101 to Alta Trail.

Response:

The preferred alternative for Oakwood Valley was modified to include on-leash dog walking from the Alta Trail to the Oakwood Valley Trail and Fire Road. On-leash dog walking would also be allowed on the Orchard and Pacheco Fire Roads. Please see chapter 2, Preferred Alternative for Oakwood Valley and Alta Trail for additional rationale.

Concern ID:

29242

**CONCERN
STATEMENT:**

Fencing - Commenters suggest removing the fenced ROLA at Oakwood Valley (or allowing it to open while on horseback) because it precludes use of the trail by other users such as cyclists and horseback riders and because there was no consensus regarding its inclusion as part of the dog plan.

Representative Quote(s): **Corr. ID:** 3912

Organization: Alto Bowl Horseowners Association

Comment ID: 205588 **Organization Type:** Non-Governmental
Representative Quote: The NPS preferred alternative "C" for Oakwood Valley is of particular concern to the ABHA. It proposes the conversion of the Oakwood Valley Fire Road to a fenced and gated Regulated Off Leash Area (ROLA) of very narrow configuration. This would essentially eliminate use of the fireroad by bicycles and horses, such use being currently permitted. The Oakwood Valley Trail on the west side of Oakwood Valley is presently designated hiker-only, so under alternative "C" equestrian access to the pond at the upper end of the valley would be eliminated. While this dead-end trail might seem insignificant on its own, it represents a popular destination for horseback rides from Horse Hill via the Mill Valley Multiple Use Path and Tennessee Valley Trail through Tam Junction. Any dog management plan that reduces or eliminates trail access for other users is not acceptable.

Corr. ID: 3934

Organization: 3rd Supervisorial District of the County of Marin

Comment ID: 205851 **Organization Type:** County Government
Representative Quote: 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.

Corr. ID: 4377 **Organization:** Marin Horse Council
Comment ID: 209167 **Organization Type:** Non-Governmental
Representative Quote: The ROLA proposed for the Oakwood Valley Fire Road will be fenced along the sides, as well as gated at both ends. As equestrians, we would like to see the type of gate that could be opened from horseback. It has been noted that, aesthetically, a fence along both sides of the fire road will detract from the "wilderness" feeling of the trail. The fence would also block wildlife from crossing the trail. That said, alternative C remains most favorable. As for the single-track trail (across the creek and roughly parallel to the fire road), it would be desirable to see the trail improved so that it could be enjoyed by both hikers and equestrians.

Corr. ID: 4685 **Organization:** Marin Conservation League
Comment ID: 209983 **Organization Type:** Non-Governmental
Representative Quote: The ROLA proposed for the Oakwood Valley Fire Road will be fenced along the sides, as well as gated at both ends. Hikers will share the fire road with off-leash dogs. We have several concerns about this proposal. First, it is not clear where the fencing would be located ' adjacent to the fire road or at some distance? In either case, if fencing is effective to contain dogs it will also interfere with free passage of wildlife across the valley. Second, it is not clear how the proposed ROLA will affect other users ' hikers, equestrians, and bikers. Oakwood Valley Fire Road is currently used by all three, and the almost parallel Trail is used by hikers and dog walkers only. It is closed to bikes and not usable by equestrians because of a narrow and unsafe bridge and steps at one end. If the proposed ROLA on Oakwood Valley Fire Road is closed to horses, equestrians will lose access to Oakwood Valley. While this road is not heavily used by horses, it is used by riders from Horse Hill. Also, if the ROLA is closed to bikes, this would force mountain bikers onto Oakwood Trail, making that trail unsafe for hikers. Resolution of these potential problems will require more study.

Response: The preferred alternative for Oakwood Valley was modified to eliminate the ROLA proposed for Oakwood Valley Fire Road due to safety concerns and protection of sensitive habitat. Therefore, no fencing would be installed. Please see chapter 2, Preferred Alternative for Oakwood Valley for additional rationale, as well as information on Alternative Elements Eliminated from Further Consideration.

Concern ID: 29244
CONCERN STATEMENT: ROLA - Commenters suggest adding more off-leash areas to sections of Oakwood Valley. Suggestions included adding off-leash areas to Oakwood Valley Fire Road and the Oakwood Valley Trail/Alta Fire Road loop. In addition the park should consider electronic leashes as an alternative to physical leashes.

Representative Quote(s): **Corr. ID:** 2142 **Organization:** *Not Specified*
Comment ID: 200572 **Organization Type:** Unaffiliated Individual
Representative Quote: Please keep the Oakwood Valley F.R. and Oakwood Valley Trail/Alta Fire Road/loop open to dog walking - off-

leash. But use a plan similar to the East Bay Parks which allows dogs off-leash under voice control. Also, consider electronic leashes as an alternative to physical leashes. E-leashes are an excellent control and help train dogs to behave properly off-leash. We have such limited access to off-leash areas in Southern Marin, don't take more away. Please consider adding more off-leash areas, where appropriate.

Corr. ID: 2239 **Organization:** *Not Specified*
Comment ID: 200878 **Organization Type:** Unaffiliated Individual
Representative Quote: This is to request that you please consider expanding the areas in the proposed plan where dogs are allowed off leash under voice control. In particular Muir Beach, Oakwood Valley and Cronkite Beach.

Response: ROLAs would not be established at Oakwood Valley due to safety concerns and impacts to sensitive habitat. Please see chapter 2, Preferred Alternative for Oakwood Valley for additional rationale, as well as information on Alternative Elements Eliminated from Further Consideration.

PN4000 – PURPOSE AND NEED: PARK LEGISLATION/AUTHORITY

Concern ID: 29696
CONCERN
STATEMENT: The enabling legislation for the GGNRA mandates that the park is for urban recreation. It is not in an isolated place, but in the middle of a large urban center, and must meet the recreational needs of Bay Area residents and visitors. If this draft plan/EIS is approved, the GGNRA it would no longer be meeting the recreational mandate under which it was created. The enabling legislation included dog walking as a recreational activity, and thus the Park Service does not have the authority to remove this activity. Some commenters felt the City of San Francisco should take back the land originally deeded to GGNRA if the changes in the draft plan/EIS are undertaken.

Representative Quote(s): **Corr. ID:** 578 **Organization:** San Francisco Professional Dog Walkers Association
Comment ID: 182095 **Organization Type:** Unaffiliated Individual
Representative Quote: The Preferred Alternative severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA. There is no off-leash access in San Mateo County in the Preferred Alternative and that must be changed

Corr. ID: 613 **Organization:** *Not Specified*
Comment ID: 181195 **Organization Type:** Unaffiliated Individual
Representative Quote: The GGNRA is an urban park, where off-leash dog walking by responsible pet owners has always been allowed. To change a long-established past practice is unfair.

If the GGNRA cannot abide by the terms under which San Francisco ceded its lands, then the GGNRA should turn the lands back over to San Francisco.

I strongly object to your new dog management plan.

Corr. ID: 617 **Organization:** *Not Specified*
Comment ID: 181199 **Organization Type:** Unaffiliated Individual
Representative Quote: Regarding the proposed dog rules, please keep in mind that the GGNRA serves an urban area populated by people and dogs, both of whom like to access the beaches and parks. The GGNRA is different than other national parks in this way. Please do not impose undue limits on dogs and their people.

Corr. ID: 1497 **Organization:** *Not Specified*
Comment ID: 191341 **Organization Type:** Unaffiliated Individual
Representative Quote: The Judge made his decision on the basic language of the formation of the GGNRA by Rep. Burton and signed by President Carter that the encompassing area be left as is for perpetuity. And thus we have what is commonly known as the Grandfather Clause, and specifically interpreted that dog walkers would enjoy the privileges they historically had. It would logically follow that any and all further acquisitions to be included in the GGNRA would also meet that mandate. This is addressed in this report that any new areas would fall under the national park service 36 code. This certainly violates the basic language and more specifically the spirit and intent of the law that formed the GGNRA

Corr. ID: 2208 **Organization:** *Not Specified*
Comment ID: 200722 **Organization Type:** Unaffiliated Individual
Representative Quote: The GGNRA has for decades provided open space for all to enjoy.
And the "all" includes dogs because they are a part of families.

The small percentage of open space that allows dogs should be left unchanged because it provides for those of us who may not be able to otherwise use the area.

Corr. ID: 2880 **Organization:** *Not Specified*
Comment ID: 202900 **Organization Type:** Unaffiliated Individual
Representative Quote: I am concerned for many reasons, some of
- Given our urban setting, the advantages in the Management Plan simply do not outweigh the constraints; it is not an appropriate plan to apply in an urban setting. While I agree with the basis of preservation outlined in the EIS, I feel that the plan is not balanced in a practical way with our urban environment.

Corr. ID: 4010 **Organization:** *Not Specified*
Comment ID: 206738 **Organization Type:** Unaffiliated Individual
Representative Quote: There has long been dog owner recreation on the lands comprising the GGNRA. These lands were transferred to the NPS with the understanding that this historical use would continue. Moreover,

Congress clearly intended that the GGNRA serve a "parks to the people" function. The DEIS proposed alternative is inconsistent both with historical use and with Congressional intent.

Corr. ID: 4667

Organization: *Not Specified*

Comment ID: 264284 **Organization Type:** Unaffiliated Individual

Representative Quote: Clearly the mandate for the GGNRA is "recreation" but the Park Service is attempting to turn the GGNRA into primarily a conservation area without a change in park mandate. In the DEIS the GGNRA uses the purpose statement from the 2008 "draft" foundation statement that does not appear to have been approved and complete the required process; the GGNRA was not created to bring a National Park caliber experience but per the enabling legislation was "in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning". In the 2002 survey they also modified the park purpose statement to minimize the recreational mandate

Response:

The 1975 agreement for the lands transfer from the City of San Francisco to the NPS states that "The National Park Service, acting through the General Superintendent, agrees to utilize the resources of GGNRA in a manner that will provide for recreational and educational opportunities consistent with sound principals of land use, planning and management, to preserve the GGNRA in its natural setting and protect it from development and uses which would destroy the scenic beauty and natural character of the area, and to maintain the transferred premises in a good and sightly condition." There is no additional specificity as to what uses constituted "recreational opportunities". The deeds for the transferred lands state that: "To hold only so long as said real property is preserved and used for recreation and park purposes", also with no additional specificity as to what uses constituted recreation.

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, 16 USC 1).

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 Act.

Concern ID:
CONCERN
STATEMENT:

29697
GGNRA is not consistent with the mission and legislation of the Park Service. Allowing off-leash dogs within NPS land is contrary to NPS policy and regulations. The draft plan/EIS should be corrected to adhere to these regulations.

Representative Quote(s): **Corr. ID:** 626 **Organization:** *Not Specified*
Comment ID: 181302 **Organization Type:** Unaffiliated Individual
Representative Quote: The National Parks are "Parks for All Forever," and allowing a use that significantly degrades the landscapes, prevents use by a majority of visitors, and causes irreparable harm to the flora and fauna is inconsistent with this vision and should not be allowed.

Corr. ID: 2188 **Organization:** *Not Specified*
Comment ID: 200582 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs are antithetical to preservation of natural and cultural resources which is the National Park's stated mission. So this plan is a failure to fulfill that mission in any meaningful way. No dogs should be allowed on national park lands except picnic areas and paved roads. To allow otherwise undermines the federal regulations on these lands and other national park lands.

Corr. ID: 2565 **Organization:** *Not Specified*
Comment ID: 195645 **Organization Type:** Unaffiliated Individual
Representative Quote: Allowing unleashed dogs within the park runs contrary to the parks mission and is inconsistent with the notion of making the park a place for wildlife. And it is not just about wildlife: Unleashed dogs are also sometimes a threat to people and other dogs, and they interfere with many visitors' enjoyment of the shoreline.

Response:

The mandate and enabling legislation for the GGNRA are outlined in the "Purpose and Need for Action" and "Golden Gate National Recreation Area Laws, Policies, and Plans" sections of chapter 1. This chapter also includes a discussion of the 1979 Pet Policy, which allows dog walking within the GGNRA, and subsequent litigation on this issue (see the "Golden Gate National Recreation Area Citizens' Advisory Commission and the 1979 Pet Policy" section of chapter 1). This draft plan/SEIS acknowledges that off-leash dog walking is inconsistent with the NPS servicewide regulation regulating dog walking (36 CFR 2.15); however, a court order has enjoined NPS from enforcing this regulation prohibiting off-leash dog walking at GGNRA. This draft plan/SEIS evaluates one of the questions commenter believes we should have already decided, that is, whether to allow off-leash dog walking, and if allowed, to what extent.

Concern ID:
CONCERN
STATEMENT:

29699
Commenters questioned the NPS' authority to dictate use on the lower portion of Alta Trail on the Donahue as on-leash dog walking, as this area was an NPS easement, but not within GGNRA boundaries.

Representative Quote(s): **Corr. ID:** 4312 **Organization:** *Not Specified*
Comment ID: 209369 **Organization Type:** Unaffiliated Individual
Representative Quote: Using the excuse that this is endangered blue butterfly habitat to impose a leash requirement is a red herring. The dogs do not trample the lupine (blue butterfly food source) growing in the area, and the humans generally stay on the road, where the lupine does not grow. You have also included the lower part of Alta Avenue (starting at the Donahue cul-de-sac) as a leash required zone, which surprises me since this stretch, although having an NPS easement, is not even within the Park boundaries. I would not think you would legally have the authority to impose a Dog Management Plan on this portion of Alta Avenue, which lies outside the park

Response: Clarification on the NPS' authority over this area of Alta trail has been included in the plan/EIS in chapter 2.

Concern ID: 41664
CONCERN STATEMENT: Commenters have stated that the mandate of GGNRA was for the "maintenance of needed recreational space." There is no mandate that dogs should not be allowed to be off-leash.

Representative Quote(s): **Corr. ID:** 1334 **Organization:** *Not Specified*
Comment ID: 195098 **Organization Type:** Unaffiliated Individual
Representative Quote: The GGNRA is a National Recreation Area, not a National Park. The mandate for the GGNRA's creation was, according to the legislation that established the GGNRA in 1972, for the "maintenance of needed recreational open space". Off-leash dog walking was acknowledged at the time as one of the traditional recreational uses taking place in the GGNRA when it was created. In 1979, the US Congress passed a law that all national park units, including national recreation areas, national seashores, and national monuments have to be managed uniformly. "The authorization of activities shall be construed and the protection, management, and administration of these areas ... shall not be exercised in derogation of the values and purposes for which these various areas have been established". So there is no mandate to match the GGNRA's policies with National Park Service requirements that dogs not be allowed off-leash in a national park.

Response: The mandate and enabling legislation for the GGNRA are outlined in the "Purpose and Need for Action" and "Golden Gate National Recreation Area Laws, Policies, and Plans" sections 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, 16 USC 1).

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 Act.

PN7000 – PURPOSE AND NEED: ADEQUACY OF EIS PURPOSE AND NEED

Concern ID: 29700
CONCERN STATEMENT: Commenters questioned the need for this project to occur given the reasons provided for action, and the current situation. They noted that many of the justifications given for the new restrictions were not based in data or other means, and therefore were not adequately proven, and were against other policies in the park. The need for the project should be more clearly defined.

Representative Quote(s): **Corr. ID:** 464 **Organization:** *Not Specified*
Comment ID: 181747 **Organization Type:** Unaffiliated Individual
Representative Quote: If it's for employee safety, then how many employees have been injured? If it's for environmental reasons, then explain how dogs are the culprit, but surfers, tour buses full of tourists, horse riders, bikers and hikers aren't. If it's to reduce conflicts, then how many and how severe have those conflicts been? (I've been taking my dog to all of these places for a greater part of the last ten years and have rarely, if ever seen any major conflict.)

Corr. ID: 1850 **Organization:** *Not Specified*
Comment ID: 192042 **Organization Type:** Unaffiliated Individual
Representative Quote: The DEIS in the Need for Action also fails to characterize accurately the urgency for action in the following sentence. The DEIS should be revised to delete this sentence. "The conflicts will likely escalate if not addressed in a comprehensive plan/EIS."

- Statistics provided in table 9 on dog management issues reflect a significant decline in all forms of incident from 2007 to 2008. During that period, the number of all incidents declined by 42%. The most serious categories of incidents declined by 61% while leash law violations declined by 39%, suggesting that dog bites/attacks and disturbance of wildlife showed a declining trend.

Corr. ID: 1905 **Organization:** *Not Specified*
Comment ID: 200479 **Organization Type:** Unaffiliated Individual
Representative Quote: With regard to the EIS itself, the P&N, or

specifically the Need Statement, is incomplete and does not include the detail and clarity that NEPA requires. Stating that there "could be" a problem and then describing an element of what may be the problem is all too theoretical. Other than a conceptually 'good idea', as defined by a likely non-dog owner at some point in time, there is no real Need that is clearly defined. The Purpose however states that a clear, enforceable policy is needed. Well that makes sense. I don't disagree that in fact there 'could be' a problem in the future and we should, as with many issues related to the environment, do everything we can to be good stewards. But it is just lazy to state that the appropriate 'clear, enforceable policy' is just to overly restrict use of these parks. The fact is that the EIS did not look at a reasonable range of alternatives. There is not enough consideration of limited restrictions or, perhaps better, new opportunities, trails, resources for the dogs and owners. There is not consideration of maintaining the GGNRA as they are today, perhaps some minor fixes on specific parks based on local problems, BUT with better enforcement of current laws. Enforcement is largely limited (and would be still if any of the action alternatives were chosen) because there are very limited Park rangers and enforcement officers. This is a problem, I agree. The cost of this EIS could have been better put to the hiring or better pay for Park rangers. Ultimately, if enforcement officers are included in the plan, add those to a new alternative looking at fewer restrictions allowing dog owners to use these resources in a positive way.

Corr. ID: 4451 **Organization:** *Not Specified*
Comment ID: 208398 **Organization Type:** Unaffiliated Individual
Representative Quote: The Need for Action, however, is never scientifically or properly established. The DEIS makes many assumptions about the negative effects of dogs on the parks in determining its need for action, yet almost never backs up these assumptions with site-specific proof.

Response: The need for the proposed restrictions 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.

PN8000 – PURPOSE AND NEED: OBJECTIVES IN TAKING ACTION

Concern ID: 29701
CONCERN STATEMENT: The validations provided for the proposed draft plan/ EIS are not based in fact, and thus cannot be used to show the need for the proposed actions. These objectives do not align with the recreational mandate included in the enabling legislation of the park. The draft plan/EIS does not meet the objectives for visitor experience. An objective to provide sufficient off-leash dog walking areas should be added.

Representative Quote(s): **Corr. ID:** 85 **Organization:** *Not Specified*
Comment ID: 181884 **Organization Type:** Unaffiliated Individual
Representative Quote: The objectives listed in the executive summary all relate to controlling, reducing and restricting dog access. Given the park's

charter to provide 'public use and enjoyment' and 'needed recreation open space' an important objective should be to preserve sufficient space for off-leash dog access.

Corr. ID: 600 **Organization:** *Not Specified*

Comment ID: 182162 **Organization Type:** Unaffiliated Individual

Representative Quote: Currently, there exist no reasons (pertaining to safety, ecology, or otherwise) which should merit revision to the long standing policies concerning dogs, leashes, their owners, and the Golden Gate National RECREATION Area.

Corr. ID: 1850 **Organization:** *Not Specified*

Comment ID: 192043 **Organization Type:** Unaffiliated Individual

Representative Quote: With no information on the actual number of dogs, visitors, activities and source of visitors, the DEIS has no foundation for designing an appropriate Plan. (It is ironic that as part of the Compliance Management Plan the DEIS foresees counting the number of dogs at each site.)The DEIS thus fails to meet the above Objective on Visitor Experience and Safety. The DEIS should be revised to address the following concerns regarding lack of information on visitation as support for DEIS.

Response:

The need for the proposed restrictions is described in chapter 1 under the "Purpose and Need for Action" section. The current situation and issues with current dog walking status are also outlined in the "Current Dog Management Issues and Impact Topics" section of chapter 1, and the enabling legislation for GGNRA can be found in the "Golden Gate National Recreation Area Laws, Policies, and Plans" section of chapter 1.

The draft plan/SEIS includes a reasonable range of alternatives allowing a diverse range of visitor experiences, including off-leash dog walking. However, an objective requiring that the plan provide "sufficient" off-leash dog walking areas would be overly narrow and would not allow NPS to consider a reasonable range of alternatives, including consideration of the NPS servicewide regulation on dog walking at 36 CFR 2.15, which is also a reasonable alternative.

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, 16 USC 1).

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 Act.

PO2010 – PARK OPERATIONS: AFFECTED ENVIRONMENT

Concern ID: 29489

**CONCERN
STATEMENT:**

Commenters expressed a lack of park ranger enforcement under current conditions, and noted unsuccessful attempts to contact park enforcement, resulting in hostility for visitors who tried to address non-compliance on their own. The presence of rangers in the park was sparse and ticketing and education was uncommon, resulting in more non-compliance.

Representative Quote(s): **Corr. ID:** 1476

Organization: *Not Specified*

Comment ID: 199986 **Organization Type:** Unaffiliated Individual

Representative Quote: We strongly support either on leash only or prohibited areas for dogs. Our experience has been that owners feel they have the right to run their animals off leash irrespective of existing law or ordinance. Off leash dogs threaten humans and other dogs and adversely affect wildlife and habitat.

Almost without exception they respond in an adversarial and occasionally combative manner when asked to leash their animal(s). Even in those areas where signage of the on leash rule is clearly posted, non compliance is the rule rather than the exception. We would support an aggressive ticketing policy.

Corr. ID: 2179

Organization: Equestrian

Comment ID: 200635 **Organization Type:** Unaffiliated Individual

Representative Quote: My efforts in the way of phone calls to the rangers and letters to the GGNRA to do something about the growing off leash dog situation never seems to make a difference as enforcement stays minimal, phone calls to rangers ignored, and people and animals are still getting hurt.

I often feel a tragedy will have to occur before this problem gets resolved and the simple solution to keep dogs on leash finally gets implemented.

Corr. ID: 2727

Organization: *Not Specified*

Comment ID: 195583 **Organization Type:** Unaffiliated Individual

Representative Quote: I live on Ocean Beach and visit the beach on a daily basis. I am not a dog owner, but I genuinely love and respect all animals. The issue involves, of course, the owner and not the owned.

Right now the vast majority of dogs run free on all sections of the beach. Dogs are not under control by their owners either by voice or leash. I've seen the signs posted to protect endangered species of birds on the beach,

and the big metal bird, but these prohibitions are ignored by most owners. Further, I have never seen any attempt by a GGNRA officer to enforce the existing codes. Indeed, how can anyone stop a running dog not on a leash from violating the protected space in season? Or attacking another animal? Or worse, attacking children and others who want to enjoy the beach?

Corr. ID: 3937

Organization: *Not Specified*

Comment ID: 205881 **Organization Type:** Unaffiliated Individual

Representative Quote: However, I see little reference to enforcement in the DDMP. While education is preferable to enforcement, that is only true if education results in compliance. My own efforts to inform visitors to the SPWPA that their dogs are supposed to be on leash has not always resulted in compliance.

The education and enforcement efforts will require considerable manpower. For example, at the SPWPA, personnel will need to be regularly present on weekends during the Snowy Plover season to, at first, inform dog owners that dogs are prohibited, and thereafter cite dog owners who do not comply with the prohibition. In my many visits to the SPWPA, I have never seen any NPS personnel, or volunteers who are authorized to engage in outreach to dog owners

Corr. ID: 4108

Organization: *Not Specified*

Comment ID: 208482 **Organization Type:** Unaffiliated Individual

Representative Quote: 2) It does not address the GGNRA's failure to enforce existing dog rules. There are no off-leash trails in these lands in Pacifica, but there are some who choose to ignore this. They are a minority of the dog hikers to be sure, but I do see them from time to time. And why is this? I can give a least 2 reasons. First, there are no legal alternatives for off-leash dog walking in Pacifica. None. The closest place is Fort Funston. Second, there is almost zero chance that they will be caught by a ranger. In my 6 years of dog hiking I have seen a ranger on only 3 occasions.

Corr. ID: 4181

Organization: *Not Specified*

Comment ID: 208765 **Organization Type:** Unaffiliated Individual

Representative Quote: The existing laws and regulations need to be regularly enforced and then the resulting environment studied prior to determining the goals and scope of the dog management plan. I visit the GGNRA parks nearly 3-4 times a week and never see rangers providing education to the public about current park rules and regulations (providing this education is required in the document that gives the land to the GGNRA), enforcing dangerous dog laws, voice control or poop pickup. We have these rules for a reason and those of us that have well behaving off leash dogs should not be punished for the failings of a few. Why has the GGNRA neglected to supervise these parklands and then assume to be able to write a report that creates more restrictions and require more enforcement without doing any studies to try and understand the community that uses the facility and cares for it?

Corr. ID: 4214 **Organization:** *Not Specified*
Comment ID: 208877 **Organization Type:** Unaffiliated Individual
Representative Quote: There were Park Service patrolling but they can't be everywhere and they're very visible. It's too easy to carry a leash and put it on the dog when you see them coming, and watch your dog chase birds the rest of the time.

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 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 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.

Concern ID:
CONCERN
STATEMENT:

29490
Commenters discuss their positive and negative relations with park rangers. Relations with rangers have not been positive for many visitors to the park, creating doubts for some park users about the effectiveness and responsiveness of rangers at GGNRA, particularly about the risks of horse use for park rangers at Crissy Field. Other commenters felt their experience with park rangers had been safe and positive.

Representative Quote(s): **Corr. ID:** 4080 **Organization:** *Not Specified*
Comment ID: 207799 **Organization Type:** Unaffiliated Individual
Representative Quote: Our considerable experiences at Ocean Beach have proven contrary to the DEIS and that the current situation is safe for all (humans, dogs, snowy plovers, etc.) and that the recreational areas provide an invaluable resource for us and our lifestyle. During all of our time visiting Ocean Beach these past couple of years, we have only had safe and positive experiences with park rangers, most of whom engage us in small talk about our dogs, whether on or off leash. Our dogs pose no danger to the wildlife or public, in fact most day's people and children want to pet or play with our dogs. And with our frequent visits to the beach, our dogs have learned "no birds" means no disturbing the wildlife.

Corr. ID: 4248 **Organization:** *Not Specified*
Comment ID: 209213 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to let you know that I am opposed to the proposed GGNRA "Dog Management" plan and hope you will do what you can to stop it. The plan is extreme. I hope you can help stop this proposed plan. It infringes and picks away and the lifestyle we enjoy as San Franciscans. I witnessed today a National Park Police Officer scare off families enjoying themselves in the Great Meadow of Fort Mason, in the shadow of Phillip Burton. They were playing with their dogs and enjoying the Memorial Day holiday. When the National Park patrol car came into site the entire park emptied. Families with children ran the other direction with their dogs. The Great Meadow was left empty. This is not the kind of

place that I want San Francisco and California to be. Please oppose the GGNRA "Dog Management" plan.

Corr. ID: 4270

Organization: *Not Specified*

Comment ID: 209094

Organization Type: Unaffiliated Individual

Representative Quote: I am writing as I am very concerned about a GGNRA (or Nat'l Park) park ranger patrol using horses at the Crissy Field beach area. This area has allowable off-leash dog use and the practice of patrol on horseback seems like an unnecessarily risky practice with potential for injury to dogs and/or their owners.

Many dogs (especially "city dogs") have not seen a horse before. Seeing a very large, unfamiliar animal in their midst is bound to create some interest or alarm, may cause the dog to run over to the horse to see it better and may include warning barking. Park rangers have warned dog owners whose dogs start approaching to keep dogs away to avoid getting kicked. In one incidence, a friend's dog was PEPPER-SPRAYED by a park ranger because the dog was approaching and barking. The ranger did not wait for the owner to come over and get the dog. I know this dog (a sweet, mellow Lab) he is not aggressive in the least he was just alarmed. The owner subsequently got the pepper spray on herself as well as her two young children (in trying to clean off the dog at home). Completely inappropriate response by the park ranger.

Because of this, I am very alarmed when I see a mounted park ranger at the beach. I go to the beach about 5 times a week. I always grab my dog until the horse passes by to avoid anything happening to him. However, I can't always see the horse approach so sometimes the horse is close by the time I see him. My dog is a well-behaved, non-aggressive dog (a Lab) and also not familiar with horses.

Response:

Chapter 4, Health and Safety discusses confrontations between visitors/dog owners and LE staff at the park which have occurred as a result of the enforcement of the NPS leash regulation, 36 CFR 2.15. Chapter 4 also 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, 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 and has been made available to Crissy Field Dog.

Concern ID:
CONCERN
STATEMENT:

29491

Signs and fences that indicate areas where dogs are not allowed have fallen into disrepair or are not present, making it difficult for park visitors to know when they have entered into sensitive or restricted areas. In addition, clear signage between city and park boundaries is not present or clear. These both increase non-compliance issues.

Representative Quote(s): **Corr. ID:** 4047

Organization: *Not Specified*

Comment ID: 207338 **Organization Type:** Unaffiliated Individual

Representative Quote: At Fort Funston, you'll sometimes see people and/or dogs exploring beyond fences and beyond the areas once delineated by now-broken or missing fences.

The consensus among dog people at Fort Funston is that they'd be happy to respect any and all currently off-limits areas, whether they are for safety or for the restoration of native habitat. But the consensus also says that it's unclear where you are currently prohibited to walk at Fort Funston. With a few fence repairs and well-placed signs, the GGNRA could clarify which areas are currently off-limits. Dog people at Fort Funston agree: this would virtually eliminate the encroachment of dogs and dog walkers on these areas.

Corr. ID: 4420

Organization: *Not Specified*

Comment ID: 207299 **Organization Type:** Unaffiliated Individual

Representative Quote: GGNRA-controlled conditions on the ground influence compliance with regulations. I visited Fort Funston May 14, 2011. There has been no apparent maintenance there for the last ten years: Fences are down or covered by sand; cables are missing; signs are missing, out-of-date, or illegible from weathering, etc. The breeding bank swallows are there, but the presence of the swallows is not indicated in any way; the bank swallow protection area shown on DEIS Maps 16 and 16A-E is not marked. A new visitor could easily be out of compliance and not know it, because GGNRA has not taken normal managerial actions.

GGNRA simply abdicates managerial responsibility when its only solution to perceived non-compliance is to further restrict recreational activity. GGNRA actually proposes to forbid itself to take any reasonable management action that would increase off leash area by even a small amount.

Corr. ID: 4533

Organization: *Not Specified*

Comment ID: 209687 **Organization Type:** Unaffiliated Individual

Representative Quote: In the headlands above Rodeo Beach, the signs do not include any indication that dogs are permitted, although there is signage relating to bicycles and horses. As a result, conflict occurs, people may unwittingly violate the policies, and people who may not want to deal with dogs don't have any information as to where they may go without dealing with off leash dogs (such as the West Beach area of Crissy Field). With respect to education and enforcement, people (including those without dogs) often don't understand the impact they may have by not staying on trails or by entering protected areas of vegetation, but once they understand

the consequences (both to the natural resources and to themselves if they could receive a fine), they often will change their behavior. The GGRNA should be doing things now to make the current status work and the Plan/DEIS should include action plans relating to improved signage, education and enforcement.

Corr. ID: 4533 **Organization:** *Not Specified*

Comment ID: 209686 **Organization Type:** Unaffiliated Individual
Representative Quote: For instance, at Crissy Field there are no signs in the eastern parking lot area or along the beach or promenade that indicate that dogs may be off leash under voice control or what specific areas are included in that policy. Instead, the signs indicate that one must "obey all posted rules", but posted rules relating to dogs are few and far between and don't delineate where dog walking ' on or off leash ' may take place, other than prohibitions at the West Beach boundaries. Near the West Beach Wildlife Protection Area, one sign says that dogs must be on leash in the "Snowy Plover Protection Area", without specifying that there is currently a 45 day period of time when dogs are allowed off leash under voice control. (That sign also states that one "MUST...recreate on the wet sand away from the upper parts of the beach...", but my understanding is that was a suggestion that was made (by Crissy Field Dog Group), but it is not part of the regulations in effect.) Further, a sign along the bridge over the lagoon indicates that Crissy Field is a resting area for the protected Western Snowy Plover, without specifying that the West Beach is preserved for that purpose (the sign makes it sound as though the threatened birds are trying to rest everywhere in the Crissy area.)

Corr. ID: 4688 **Organization:** *Not Specified*

Comment ID: 210088 **Organization Type:** State Government

Representative Quote: 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.

Response:

New signage, education and outreach are important elements of the implementation plan. Fencing or barriers would be installed on an as-needed basis throughout the park as funding is available. Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

Concern ID:

***CONCERN
STATEMENT:***

29492

Signage is currently good at the parks, but people still choose not to regard posted rules and regulations for dog walking. This results in impacts to other visitors, wildlife, and habitat due to non-compliant users. Regulations need to be enforced.

Representative Quote(s): **Corr. ID:** 2252 **Organization:** *Not Specified*
Comment ID: 201006 **Organization Type:** Unaffiliated Individual
Representative Quote: 2. The tolerance for non-compliance of off-leash activities is FAR too low. Every single time I go out in our parks, I see them overrun with off-leash dogs, running directly under signs that say dogs should be on-leash. In general, I think the signage is good. It's just that no one enforces it. When one person lets his dog off-leash, other people want to, also. It's a spiral. The plan should strive for 95% compliance. There should be friendly tickets, and perhaps even warnings, or people around to verbally re-enforce the signage.

Corr. ID: 2370 **Organization:** *Not Specified*
Comment ID: 201192 **Organization Type:** Unaffiliated Individual
Representative Quote: There were clear signs right now in the various beaches that are being violated. I would like stricter measures to be taken to enforce the new regulations. I am all for certain areas for pet recreation. But please enforce the rules, appearing lax only makes things worse

Response: Enforcement policies for the draft plan/SEIS have been added to chapter 2. The proposed monitoring-based management strategy (MMS) includes focused education and enforcement as the primary management response for noncompliance, and would better achieve the purpose, need, and objectives of the draft plan/SEIS.

Concern ID: 31544
CONCERN STATEMENT: [The park service replacement of signage \(from maps to signs that said no dogs\) is indicative of the current issues with NPS management and enforcement. Such measures increased public distrust of park service management and noncompliance with leash restrictions.](#)

Representative Quote(s): **Corr. ID:** 4697 **Organization:** *Not Specified*
Comment ID: 227450 **Organization Type:** Unaffiliated Individual
Representative Quote: Certain areas of Ocean Beach had been designated as off leash areas, and other portions designated as on leash where the Park Service had identified a need to avoid the possibility of interaction with Snowy Plovers. There were clear signs at the beach with maps showing exactly where the off leash and on leash areas began and ended. By and large the public obeyed the restrictions. One could watch beach walkers routinely running and playing freely with their dogs off leash while carrying leashes and then stopping to clip on the leashes when getting into the restricted Snowy Plover area.

However, that cooperative compliance ended when the Park Service tore out those clear signs with the maps and replaced them with signs that instructed that dogs must be on leash at all times. As a result we had a situation where the public distrusted and ignored the signs completely and there is no information regarding the special area. I saw off leash dogs in the area where previously they would be leashed due to the identified special protection need.

Hence, by adopting a nominal universal policy that is unenforceable and

unpopular the Park Service actually had the opposite effect ' increasing the likelihood of off leash dogs in the identified natural resource risk area. If the Park Service cannot possibly achieve enforcement of an overall ban, it should not attempt a partial enforcement that will merely cause migration of park users from areas previously identified as appropriate due to their lower protection need into other areas that have a higher protection need.

Response:

New regulatory and interpretive signs will be developed for all dog walking areas with consistent design and style that is clear and concise so that the public can understand the regulations at specific sites. Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

PO4000 – PARK OPERATIONS: IMPACT OF PROPOSAL AND ALTERNATIVES

Concern ID:

29494

**CONCERN
STATEMENT:**

Commenters stated that the proposed rule would cause people to walk dogs off leash illegally, and questioned how enforcement would be possible if current rules could not even be enforced. The new rules must be adequately enforced, but would be very difficult to enforce. Additional staff would be necessary to enforce rules and ticket offenders.

Representative Quote(s): **Corr. ID:** 239

Organization: *Not Specified*

Comment ID: 180789 **Organization Type:** Unaffiliated Individual

Representative Quote: If there is no avenue for walkers to be responsible and legally walk dogs off leash, that increases the likelihood of dog walkers using GGNRA areas illegally. Walkers who violate on-leash regulations are also more likely to ignore common courtesy guidelines such as cleaning up after their dogs and keeping dogs under voice control.

Corr. ID: 658

Organization: *Not Specified*

Comment ID: 181515 **Organization Type:** Unaffiliated Individual

Representative Quote: If GGNRA is going to have dog policies, they must be enforced, which will require adequate staff and a willingness to levy fines, high enough to get the owners' attention.

Corr. ID: 4013

Organization: *Not Specified*

Comment ID: 206810 **Organization Type:** Unaffiliated Individual

Representative Quote: I appreciate that fiscal/budget constraints will affect that actual number of NPS officers available for enforcement - and the answer I received must be taken at face value as a spot estimate. But the simple fact that imposing more restrictive regulations across a wide area of GGNRA lands will results in many such areas falling into non-compliance. As per the DDMP designed strategy, non-compliance will cause even more restrictions to implemented. With every new level of restrictions - enforcement efforts must be taken & enforcement resources must be allocated.

If the DDMP compliance based policy is moved forward as stated, and the amount of enforcement resources are not greatly expanded, how is this strategy deemed feasible?

Corr. ID: 4642 **Organization:** *Not Specified*
Comment ID: 208835 **Organization Type:** Unaffiliated Individual
Representative Quote: All of the GGNRA "preferred alternatives" would significantly reduce access by dogs, both on and off leash. Reducing access in this way is a simplistic approach to complex problem. If there are not enough personnel to enforce the current areas where leashes are required, enforcing areas where dogs are not allowed will be equally difficult. Restricting the number of accessible areas will only increase the pressure and negative consequences on the areas where access is allowed. This may result in a future justification for banning dogs from the parks altogether. In particular, the Compliance Based Management Strategy allowing further (and arbitrary) restriction without additional public comment is in contradiction to the spirit and intention of the outdoor areas maintained by the GGNRA. The proposal that all new GGNRA lands will have no off-leash access is another blanket approach to the problem. At a minimum, these portions of the proposed plan must be eliminated.

Response: Additional staff would be hired when the dog management plan is implemented to increase law enforcement presence throughout the park. New regulatory and interpretive signs will be developed for dog walking areas with consistent design and style that is clear and concise so that the public can understand the regulations at specific sites. One objective for the dog management plan is to maximize dog walker compliance with clear, enforceable parameters. Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

Concern ID: 29495
CONCERN STATEMENT: The increased enforcement required by the dog management plan will alienate park visitors, and create a police-state atmosphere, where there will be friction between visitors and park rangers. This would be bad for park relations and the park's image. Many commenters did not feel that the rules would improve compliance, and many commenters stated that they would not comply with the rules if they are instated.

Representative Quote(s): **Corr. ID:** 1470 **Organization:** *Not Specified*
Comment ID: 199981 **Organization Type:** Unaffiliated Individual
Representative Quote: NO NO NO Do NOT prohibit dogs from our National Seashore. They belong here as much as do coyotes and foxes and children and hawks and eagles and osprey. Birds adapt to dogs as they do to humans and other predators and become stronger for it. I have witnessed this happen. (OVER) protecting the bird populations does NOT serve the birds nor does it serve we, the taxpayers and dog owners, who live near our parks and utilize these parks.

Prohibiting dogs from our parks will also create undue stress on park personnel who will have to devote all together too much time to enforcing these proposed dog restriction policies. Do Park personnel really want to become viewed more as police people than stewards for the Parks? Is delegating more time to law enforcement really they way park personnel want to spend their time?

Don't let these people drive the park system into adopting over restrictive and unfair policies which will further make the Park system an unfriendly to people environment.

Corr. ID: 1804 **Organization:** *Not Specified*
Comment ID: 191670 **Organization Type:** Unaffiliated Individual
Representative Quote: Furthermore I question the victimizing of dog owners and their dogs as an effective and realistic solution to preserving endangered areas, providing a variety of visitor experiences, improving visitor and employee safety, reducing user conflicts, nor maintaining park resources and values for future generations. The level of enforcement required by Alternatives B-E would be much more excessive and create a resentful and antagonist atmosphere. Alternatives B-E blatantly lack many other possible solutions that would not require such extreme restrictions to people and their dogs.

Corr. ID: 1834 **Organization:** *Not Specified*
Comment ID: 191974 **Organization Type:** Unaffiliated Individual
Representative Quote: My overall impression of the voluminous Dog Management Plan is that it represents yet another example of a Federal Agency burdening its citizens with overregulation that is neither needed nor wanted and will be costly to enforce. Furthermore, it will require a US Park Police or Ranger presence that would be oppressive. A return to the aggressive US Park Police or Ranger tactics of ticketing dog walkers would certainly further tarnish the image of the Park Service among dog walkers; we simply don't want the feeling of a police state in our parks. Surely the U.S. Park Police or the Rangers have higher life and safety priorities to attend to rather than committing their resources to ticketing responsible dog walkers.

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. Please see chapter 2, Elements Common to Action Alternatives for information on outreach, education, and additional signage.

Concern ID:
CONCERN
STATEMENT:

29496
There are concerns about where the increased monetary funds and labor needed to enforce the new dog management plan would be coming from, and if these funds would be sufficient to adequately enforce the plan. Additionally, these funds and labor could be used for other purposes if not allocated to the new plan. Commenters feel the park does not have resources or support to implement the new plan.

Representative Quote(s): **Corr. ID:** 1770 **Organization:** *Not Specified*
Comment ID: 191535 **Organization Type:** Unaffiliated Individual
Representative Quote: In this time of budgetary deficits, where will the

money come from to implement any plan? As a taxpayer I object to my tax dollars being used to fund futile efforts. The enforcement costs of getting people to leash their dogs in certain areas would exceed any revenue collected from fines. A budget analysis of the proposed dog management plan would show the folly of trying to enforce restrictions on a waste land

Corr. ID: 2920 **Organization:** Save Our Seashore
Comment ID: 203356 **Organization Type:** Conservation/Preservation
Representative Quote: In that regard, we note that the Draft Environmental Impact Study (DEIS) Volume 2, Table 12, page 1568 estimates the cost for a program planned to run 5% years (Per page 1725) to be about \$1.5 Million under any action alternative. Given that DEIS Volume 1, page 66 notes that the proposed monitoring plan will be peer reviewed to insure statistical rigor and accuracy and training of monitoring staff to insure uniform measurement and interpretation of data," then in our opinion, that \$1.5M would appear to be a material under-estimate.

Corr. ID: 4312 **Organization:** *Not Specified*
Comment ID: 209378 **Organization Type:** Unaffiliated Individual
Representative Quote: And finally I want to point out the impact that construction of the fence and gates and the requirement for ongoing surveillance by park police to enforce the policy will have on the GGNRA budget. I am under the impression that almost all national parks have a long list of projects and maintenance that require attention but end up being neglected for lack of funds. I am sure that must also be the case in the GGNRA. By imposing the Dog Management Plan proposed for the Oakwood Valley Fire Road/Alta Avenue routes, you will be diverting funds from other projects that would be much more worthwhile to the park and its users than the overly and unnecessarily restrictive dog management plan as currently formulated.

Response: Chapter 4, Park Operations has been revised to include more detail on park funding for the draft plan/SEIS.

Concern ID: 29497
CONCERN STATEMENT: Commenters had concerns for the design and components of the draft plan/EIS, which they felt was confusing, including having off-leash areas connected by on-leash areas, which would result in an enforcement headache due to confusion and active non-compliance. Some commenters suggested using park rangers for other law enforcement needs, and suggested improving compliance monitoring by weighted costs for violations, measuring violations in relation to the numbers of dogs, dog walkers, and the duration of issues.

Representative Quote(s): **Corr. ID:** 78 **Organization:** *Not Specified*
Comment ID: 181838 **Organization Type:** Unaffiliated Individual
Representative Quote: I have walked my dogs in Oakwood Valley 3-5 times a week for the past 5 years. Not only is restricting them on parts of the trail loop a disaster for responsible dog owners, but I question whether enforcing such a law is anywhere near a sane expenditure of funds

Corr. ID: 1904 **Organization:** Government
Comment ID: 200341 **Organization Type:** Unaffiliated Individual
Representative Quote: Park Rangers are not animal control officers. They should be on patrol to stop speeders, thieves, and drunken visitors who have the greatest potential to harm the GGNRA and its visitors. I support law enforcement when its applied appropriately, and where its needed the most. Do the proper research and you will see that pets are not a threat compared to people who speed, steal, fight, and become a nuisance to others in the Park.

Response: The preferred alternatives have been designed to be clear to the public and easily enforceable for the park. The compliance-based management strategy has been revised. Please see chapter 2 for more detail. Regarding violation costs, fine amounts are determined by the Federal Court; however, the court does take into consideration recommendations from the NPS.

Concern ID: 29499
CONCERN STATEMENT: Enforcement of the rules could be a good opportunity for GGNRA to bring in revenue from citation of dog owners who are not following the rules.

Representative Quote(s): **Corr. ID:** 575 **Organization:** *Not Specified*
Comment ID: 182081 **Organization Type:** Unaffiliated Individual
Representative Quote: Moreover, I'd love for you to figure out some way to police the dog rules. I know budgets are tight, but rangers issuing citations strikes me as a revenue opportunity! Let's have a great big fee for getting caught with an off-leash dog.

Corr. ID: 2425 **Organization:** *Not Specified*
Comment ID: 200665 **Organization Type:** Unaffiliated Individual
Representative Quote: Couldn't you make some money off enforcement, enough to pay for the enforcement, at least for a while, at least until the dog owners get the hint and take their activities where they belong?

Corr. ID: 3812 **Organization:** *Not Specified*
Comment ID: 208449 **Organization Type:** Unaffiliated Individual
Representative Quote: Finally, I believe that many dog owners see citation fines as "the cost of doing business," and encourage the park to increase citation costs, especially for repeat offenders.

Response: Citations will be issued to visitors not complying with the new dog walking regulations. However, fines paid for federal violations are not retained at the park, but are deposited in the US Treasury.

PO5000 – PARK OPERATIONS: IMPACTS

Concern ID: 41808
CONCERN STATEMENT: Commenters were concerned that the draft plan/EIS did not provide a comprehensive list of cumulative projects that could affect dog walking in the GGNRA areas with regards to Appendix K.

Representative Quote(s): **Corr. ID:** 4693 **Organization:** *Not Specified*
Comment ID: 210084 **Organization Type:** Unaffiliated Individual
Representative Quote: In Chapter 4, page 1568 and Appendix K, the DEIS states that 'At GGNRA... elevated threat levels require closures in and around Fort Point, the Coastal Trail, and Fort Baker. These closures may preclude dog walking in those areas...' Based on this information, the DEIS fails to include a comprehensive list of cumulative projects that could affect dog walking in GGNRA areas. Therefore, the cumulative assessment is inadequate and should be revised to consider all of the past, present and future actions that could affect dog walking in the vicinity of GGNRA areas.

Response: The list of cumulative projects has been updated in Appendix K. The cumulative impact analysis has been updated in chapter 4.

PP1300 – PEDRO POINT: DESIRE OTHER ALTERNATIVE

Concern ID: 29281
CONCERN STATEMENT: Commenters support alternative A, the no-action alternative because the site is well suited for on-leash and off-leash dog recreation.

Representative Quote(s): **Corr. ID:** 1918 **Organization:** *Not Specified*
Comment ID: 192600 **Organization Type:** Unaffiliated Individual
Representative Quote: Sweeney Ridge + Pedro Point Headlands and Fort Funston are ideal for on leash + off leash dogs. Don't change the current land use plan.

Corr. ID: 4385 **Organization:** *Not Specified*
Comment ID: 209561 **Organization Type:** Unaffiliated Individual
Representative Quote: Recognizing that improving Crissy Field and other GGNRA lands is a continuous and collaborative process, I do support some of the modifications presented in the proposals provided that these modifications are made to the Existing Alternative. For example, I am in favor of an on-leash policy for dogs in all parking areas. However, after much consideration and review of the very large amount of material, and with the addition of on-leash rules for parking areas, I support Alternative A, the No Action alternative for Crissy Field, Fort Funston and Baker Beach. Additionally, I also include the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra) in San Mateo county in my comments and support that these areas be open to generous on-leash (parking areas and other truly environmentally sensitive areas where people, horses and bikers are also restricted) and off leash dog walking as well.

Response: Alternative A was not selected as the preferred alternative for Pedro Point. The preferred alternative would allow both an on-leash dog walking and a no-dog experience. ROLAs would not be established at Pedro Point for safety concerns and protection of wildlife and restored habitat. Please see chapter 2, Preferred Alternative for Pedro Point Headlands for additional rationale, and Elements Considered but Dismissed regarding ROLAs on trails.

PP1400 – PEDRO POINT: SUGGEST CHANGE IN ALTERNATIVE

Concern ID:

29287

**CONCERN
STATEMENT:**

Site Access - Many of the trails at Pedro Point are good for both on- and off-leash dog walking. The maps from the Pacifica Land Trust should be analyzed in the creation of trails in Pedro Point. The new draft plan/EIS is not satisfactory because it would restrict visitors from enjoying many of the trails in Pedro Point with their dogs, and removes access points to many of their nearby neighborhoods. This means residents of the area would need to drive to the trail access, and would have to go elsewhere if they wanted to bring dogs. The addition of certain trails such as South Ridge Trail, Bluff Trail, North Ridge Trail, Middle Ridge, and Arroyo Trail would allow access to the site from the surrounding neighborhoods, and other access points.

Representative Quote(s): **Corr. ID:** 4511

Organization: *Not Specified*

Comment ID: 209502 **Organization Type:** Unaffiliated Individual

Representative Quote: Thus, we were dismayed when we saw the proposed preferred alternative for the Pedro Point Headlands that would allow on-leash dog-walking on only a small portion of the PPH trail system located next to Highway 1. There are several neighborhood trail access points to the PPH lands, one at the top of Grand Avenue where we live and another on Olympian Way. Those access points do not connect to the PPH anywhere near the GGNRA-designated dog-walking trail, however. To access the GGNRA-designated trail, almost all residents of the Pedro Point district of Pacifica would need to get in their cars and drive to the designated trail to walk their dogs or drive elsewhere to walk their dogs, which would contribute further to traffic congestion (already a problem on Highway 1) and cause harm to the environment through pollution. Also, there is no parking area near the GGNRA's designated dog walking trail. One wonders if trail users would park illegally and/or dangerously near the trail entrance. Finally, because the GGNRA-designated trail for dog-walking in the PPH is so close to the highway as to be unpleasant and because no nearby parks are dog walker-friendly, I expect that most Pedro Point residents with dogs, including us, would drive down the coast (e.g. Montara or beyond) to find a place to walk our dogs.

Corr. ID: 4511

Organization: *Not Specified*

Comment ID: 209503 **Organization Type:** Unaffiliated Individual

Representative Quote: Consequently, I would like to recommend that the GGNRA recast its dog-walking plan for the PPH to permit dog walking on the South Ridge Trail, Bluff Trail, North Ridge Trail, Middle Ridge, and the Arroyo Trail. This change would enable Pedro Point neighborhood residents who walk dogs to access the PPH lands on foot, without having to drive to a single trail head near Highway 1. Moreover, this change would also allow dog walkers to make a loop within the PPH trail system (as a general policy, I recommend that all GGNRA parks have loop trails where dog walkers are able to make a loop).

Corr. ID: 4641 **Organization:** *Not Specified*
Comment ID: 208811 **Organization Type:** Unaffiliated Individual
Representative Quote: The new plan is especially restrictive for the trails on Mori Point, Sweeney Ridge, and Pedro Point, all where I live, in Pacifica. They are so restrictive as to keep people from enjoying the best parts of these three parks. You could not reach Mori Point itself with your dog, nor could you enjoy the views from Sweeney Ridge or Pedro Point. In fact, for the latter two parks, it would not be worth visiting' with your dog, since you could not access the best parts.. This is a shame, since they are all beautiful parks, with very nice trails on which to take a dog for a walk.

Corr. ID: 4688 **Organization:** *Not Specified*
Comment ID: 210093 **Organization Type:** State Government
Representative Quote: 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.

Response: The maps from the Pacifica Land Trust were analyzed and included in the draft plan/SEIS. The preferred alternative would not allow dog walking on the trails suggested in order to protect restored habitat, wildlife and for safety concerns. Please see chapter 2, Preferred Alternative for Pedro Point Headlands for additional rationale.

Concern ID: 41813
CONCERN STATEMENT: [Pedro Point should be considered under New Lands, since the park is unfamiliar with the site.](#)

Representative Quote(s): **Corr. ID:** 3059 **Organization:** Golden Gate National Recreation Area
Comment ID: 201239 **Organization Type:** Unaffiliated Individual
Representative Quote: I think that the Pedro Point prescriptions were based on very little information, as the park is currently relatively unfamiliar with the trail systems and resource issues at this site. I propose that the park revoke this prescription and consider the site a "New Land" and follow the prescription provided for such areas.

Response: The park will continue to analyze Pedro Point as a separate site. New data has been incorporated. Please see chapter 3 and 4, Pedro Point Headlands for more details.

PS1000 – COMMENT REGARDING PUBLIC SCOPING PROCESS

Concern ID: 29511
CONCERN STATEMENT: Commenters were disappointed that public hearings were not held on the draft plan/EIS. Some commenters assumed that a public hearing is required under NEPA.

Representative Quote(s): **Corr. ID:** 1105 **Organization:** *Not Specified*
Comment ID: 192289 **Organization Type:** Unaffiliated Individual
Representative Quote: I am disappointed that the open house format was used instead of an open forum. I feel that without vocalizing in public, my concerns will not be heard.

I support keeping the rules as they are now. Do not impose new rules or laws.

Leave GGNRA dogs alone!

Corr. ID: 1652 **Organization:** *Not Specified*
Comment ID: 191047 **Organization Type:** Unaffiliated Individual
Representative Quote: Under NEPA, you need to hold a public hearing, which this meeting (3/7 - Ft. Maston) is not!

Dogs are already limited to less than 1% of GGNRA lands. To restrict them more is an outrage. The Preferred Alternative in the EIS should not be adopted. If anything off-leash areas should be expanded.

Response: NEPA regulations require public meetings for an EIS; however, public hearings are not required. Public hearings can also deter those who are not comfortable speaking in a charged environment; denying them the opportunity to provide direct public comment to park staff.

GGNRA held four public open house meetings, staffed by 22 NPS employees. A total of 1,400 people attended and most of those discussed the plan directly with NPS staff members. Written comments were also taken and posted during the meeting for all attendees to read.

Concern ID: 29512
CONCERN STATEMENT: Some commenters were not aware of the public meetings. Other commenters stated that further meetings never occurred in Montara. The Montara Dog Group was not contacted about providing comment on the plan. Marin County felt like it was left out of the process. The Crissy Field Dog Group stated that they wanted more response from the Superintendent on their comments. Decisions regarding New Lands (i.e., Rancho Lands) were made without input from local dog walkers, violating U.S. vs. Barton. Some stated that the draft plan/EIS was not well publicized. The meetings

were only held during work hours. There was lack of signage announcing the comment period.

Representative Quote(s): **Corr. ID:** 1257 **Organization:** Montara Dogs
Comment ID: 194954 **Organization Type:** Unaffiliated Individual
Representative Quote: And as for public involvement, our community has been purposely ignored in this process. There was one public meeting, which I attended, a year ago in Montara. MANY dog owners attended -- it was amazing the large turn-out -- to voice community concerns and desires. But Park Service representatives refused to address the concerns of dog owners, referring us to the dog management plan and draft EIS under development .

Further meetings were promised; yet, no further public meetings have been held in our area. And the Montara Dog Group has never been contacted for input to the plan.

Corr. ID: 1812 **Organization:** *Not Specified*
Comment ID: 191795 **Organization Type:** Unaffiliated Individual
Representative Quote: The proposal to change the off leash regulations at various sites throughout the GGNRA has not been well-publicized. I take my dog to Crissy Field once a week when I work in San Francisco and there are no notices posted about this proposal. I have no idea if it has been posted at any of the other sites affected by the proposal, but I have asked friends who use Rodeo Beach, and they knew nothing about the proposed changes.

Corr. ID: 4409 **Organization:** Montara Dog Group
Comment ID: 200884 **Organization Type:** Non-Governmental
Representative Quote: One of my main concerns about this plan was lack of public involvement in the treatment of "New Lands" (see p. 32, Public Involvement with the National Environmental Policy Act Process). The public has not had the opportunity to participate in the development of the Dog Management Plan when it comes to the New Lands category. New Lands were not involved in the scoping process and the other activities required by NEPA, nor were they involved in the negotiated rule making process.

Corr. ID: 4601 **Organization:** *Not Specified*
Comment ID: 209944 **Organization Type:** Unaffiliated Individual
Representative Quote: The lack of consultation with local dogwalkers contrasts starkly with the deference accorded horseback riders using the same areas. Horseback riders were consulted early in the transfer process, and their comments acted upon before any decisions were made as to the stable areas and riding trails. The contrast strongly suggests a decision to avoid consultation with area dogwalkers. This is an intentional violation of the law as interpreted by *US v. Barton*.

Response: Public meetings were announced on the park website, in a newsletter sent to the 7,000 individuals 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, as well as on a Saturday. Online commenting using PEPC was available for over 120 days. Public meeting materials were also posted on PEPC.

No decision has been made regarding Rancho lands, and input from local dog groups was received through public comment (following NEPA regulations). The public will have an additional opportunity to comment on the decisions regarding Rancho lands during the public comment period for the draft plan/SEIS and the proposed rulemaking that will follow.

Concern ID:

**CONCERN
STATEMENT:**

29513

Input from the local communities should have been incorporated before the draft plan/EIS was released. If the public was involved sooner in the process, then there would be less controversy on the draft plan/EIS. Alternately, some commenters expressed the suggestion that meetings be held with various interest groups after the comment process had been closed, to allow for a kind of "working session".

Representative Quote(s):

Corr. ID: 504

Organization: *Not Specified*

Comment ID: 181893 **Organization Type:** Unaffiliated Individual

Representative Quote: I was very upset to see that GGNRA has decided, without inputs from the local community (other than one meeting at Farallone View where the majority of the people spoke overwhelmingly in favor of allowing dog access), to ban all dogs from the property. In my opinion, this is not only unjust to the local community and doesn't support the established mixed use (targeting for exclusion just one group), but is not founded on research or analysis.

Corr. ID: 4144

Organization: citizen of these here united states

Comment ID: 208616 **Organization Type:** Unaffiliated Individual

Representative Quote: The public has not had the opportunity to participate in the development of the Dog Management Plan. If it had and the wishes of the public had been taken into account we would not be dealing with a plan at this late date so out of touch with the wants and desires of the GGNRA main constituency: the residents of Marin, San Francisco, and San Mateo counties.

Corr. ID: 4462

Organization: K&L Gates LLP for Crissy Field Dog Group

Comment ID: 209719 **Organization Type:** Non-Governmental

Representative Quote: 1. Understanding comments. We note our suggestion made at the public meetings that you, along with staff most involved in developing the alternatives and mitigation measures, meet with interested groups not long after the end of the draft document comment period. The purpose of the meeting would be a real working session for GGNRA to understand the comments made, particularly on the draft Plan, where you can ask questions and understand what a written comment intended. It would not "extend" the public comment deadline or provide commenters with "another bite at the apple." A few sessions could be held with different perceived interests, such as dog walkers, environmental

groups, neighborhood groups, and local government. The sessions could be public; we are not afraid of access by other stakeholders to you or others hearing what we intend by our comments on the draft Plan.

Response:

Significant public involvement on dog walking in GGNRA has occurred since 2001, including establishment of a Negotiated Rulemaking Committee. The public involvement process is described in chapter 1, Scoping Process and Public Participation.

Public scoping ended with the publication of the draft plan/EIS; working meetings with specific interest groups after the public comment period on the draft plan/EIS has closed would obviate the public comments received and would be unfair to "unconnected" groups or individuals not able to participate in these subsequent, unannounced "working sessions". This would violate NEPA, as well as the Federal Advisory Committee Act. The public comment period is designed to allow all members of the public to comment, and not provide undue influence to any particular group through ex parte communication with decision makers.

Concern ID:

29514

**CONCERN
STATEMENT:**

Some commenters were not able to get access to PEPC. Some commenters did not know that the comment period ended at 12:00 PM.

Representative Quote(s):

Corr. ID: 1485

Organization: *Not Specified*

Comment ID: 191267

Organization Type: Unaffiliated Individual

Representative Quote: Thank you for the opportunity to comment. By the way, I could never get the internet response site to work for me.

Corr. ID: 1805

Organization: *Not Specified*

Comment ID: 191673

Organization Type: Unaffiliated Individual

Representative Quote: I have tried on several days to access the plan online and to make comments there and have not been able to read the site. Any plan consideration should be deferred until the public has reliable access.

Response:

The draft plan/EIS was made available for public review from January 14, 2011 through May 30, 2011. Comments were not only accepted electronically through PEPC, but also by hard copy via the mail or hand delivery.

Concern ID:

29516

**CONCERN
STATEMENT:**

There is a concern about the cost of the draft plan/EIS and how many employee hours were spent on the document. There is also a concern about printing copies of this large document; use CD/DVDs instead. Some commenters noted that a simple summary of the draft plan/EIS would have been helpful to commenters. Expand the parks outreach to minorities by providing copies of the draft plan/EIS in different languages.

Representative Quote(s): **Corr. ID:** 173 **Organization:** *Not Specified*
Comment ID: 182391 **Organization Type:** Unaffiliated Individual
Representative Quote: I would like the exact cost of the 2400 page document made public and the number of employee hours involved'

Corr. ID: 1044 **Organization:** *Not Specified*
Comment ID: 192122 **Organization Type:** Unaffiliated Individual
Representative Quote: It would make it easier if you had a simple summary that the public could read. And a simple way to email you instead of this form. The process you have favors the dog coalition in the City that is organized, and not individuals like myself.

Corr. ID: 4070 **Organization:** Mar Vista Stables
Comment ID: 207685 **Organization Type:** Unaffiliated Individual
Representative Quote: 6)DEIS/ FEIS distribution-Why wasn't a request sent out to the mailing list asking them which format they would like to receive the DEIS in? Printing thousands of hard copies of a thousand plus page EIS seems like a complete waste of park service budget and resources. This request is recommended for the FEIS

Corr. ID: 4130 **Organization:** *Not Specified*
Comment ID: 208560 **Organization Type:** Unaffiliated Individual
Representative Quote: GGNRA can also expand the outreach to residents of a minority-majority city such as providing copies of the Draft Plan in different languages other than English.

Response:

The park has worked efficiently on the dog management plan and has worked within the park's budget. Those added to the project contact list during scoping were asked if they preferred hard copy or electronic versions of the document. The park mailed CD/DVDs to majority of recipients who preferred to not review the document online, to reduce printing costs, and posted documents on PEPC to reduce the use of resources. A Quick Start Guide to the draft plan/EIS and Executive Summary were available on PEPC to provide an overview of the document. Due to limited resources, the translation of a document this size would be cost prohibitive.

Concern ID:
CONCERN
STATEMENT:

29517
The format for the public meetings was excellent; commenters felt safe, well briefed, and very able to express their opinions in many ways. The open house meetings were preferred over the public hearing style. However, there were concerns that some commenters choose not go to the public meetings and did not comment because in the past public meetings have been a hostile environment dominated by pro-dog individuals.

Representative Quote(s): **Corr. ID:** 1691 **Organization:** *Not Specified*
Comment ID: 191094 **Organization Type:** Unaffiliated Individual
Representative Quote: I want to congratulate the Park Service for creating a meeting format that feels safe, secure, and gives a wonderful series of opportunities to express my opinion, both personally, in writing, on the easel boards, and on-line. I felt well briefed, given much personal time, and all questions were answered.

Corr. ID: 4669 **Organization:** *Not Specified*
Comment ID: 209180 **Organization Type:** Unaffiliated Individual
Representative Quote: I am concerned that you and other officials have heard only from those opposed to the Plan. I also understand why this may be the case. Public hearings on this issue have been uncivil, with advocates for unrestricted offleash dogs in the GGNRA shouting down or ridiculing those with opposing views. The result is a hostile environment in which many thoughtful individuals may choose not to publicly participate in the process. Should the Plan not be adopted, they will express their views by not visiting or otherwise supporting the GGNRA.

This is not how government should work. Those who shout the loudest should not inevitably get their way. I understand that emotions run high in this vocal minority of individuals. However, that does not excuse the embarrassing denial of democracy.

Response: The park chose to hold open house meetings rather than public hearings to create a less intimidating environment for attendees and allow one-on-one conversations with park staff. Those wishing to not attend the public meetings were still able to submit thoughts and comments from January 14, 2011 through May 15, 2011 either by mail or online.

Concern ID: 29522
CONCERN STATEMENT: [There should be oversight and transparency of the public comment process from an independent or third party. There is concern that the public will not be informed that all legal requirements have been followed. There is a conflict of interest if GGNRA staff evaluates the public comments.](#)

Representative Quote(s): **Corr. ID:** 3970 **Organization:** *Not Specified*
Comment ID: 206092 **Organization Type:** Unaffiliated Individual
Representative Quote: Finally, I ask that you hire an independent and neutral third party to receive, count, organize and analyze the comments sent to the GGNRA regarding the Dog Management Plan. Otherwise, there will be no oversight, no watchdog, and no credibility for any results which the GGNRA might announce or purport to use as a basis for future action.

Corr. ID: 4102 **Organization:** SFDOG
Comment ID: 208462 **Organization Type:** Unaffiliated Individual
Representative Quote: The NPS must arrange for an independent entity to evaluate the public comment on the DEIS. Assigning the comments to GGNRA staff, the very people whose research is being attacked by these comments, is a conflict of interest of the most egregious kind. There must be independent analysis of the public comments and an independent determination of how the analysis of any Alternatives must be changed to accommodate the comments.

Response: All public comments were considered in the revision of the draft plan/EIS. Based on the public comments received, a number of changes were made to the preferred alternatives to allow additional dog walking opportunities.

Concern ID:
CONCERN
STATEMENT:

29524

Commenters mentioned several issues relating to the public comments. Some commenters were concerned that many of the comments were from people who are not from the Bay area, and that comments from stakeholders located outside the bay area should not be equally weighted, while other commenters asked that NPS consider all public comments on the Fort Funston rulemaking including the 2001 public hearings, the ANPR, and the prior correspondence generally received on the issue, by reopening the 2001 public hearing so that commenters can present their views. All public testimony provided on this issue preceding the release of the draft plan/EIS should be considered.

Representative Quote(s): **Corr. ID:** 2001 **Organization:** *Not Specified*
Comment ID: 193201 **Organization Type:** Unaffiliated Individual
Representative Quote: -Please consider all public comment given on this issue in the Fort Funston rulemaking, the 2001 public hearings the ANPR and the prior correspondence generally received on the issue of limitation of the 1979 pet policy.

-Please contact and reopen the 2001 hearing comment by person who attended the hearing but were not allowed to present their comments. The hearing was postponed/continued based on a vote to take no action and anticipated further hearing before any action was taken. The people who came to speak at that hearing should be given an opportunity to present their views as they left the hearing based on the assurance that they would have another opportunity if action was to be taken.

Corr. ID: 3956 **Organization:** *Not Specified*
Comment ID: 207063 **Organization Type:** Unaffiliated Individual
Representative Quote: While I understand that the GGNRA is a national recreation area, I must express my belief that comments from stakeholders many miles distant should not be equally weighted.

Corr. ID: 4551 **Organization:** *Not Specified*
Comment ID: 209840 **Organization Type:** Unaffiliated Individual
Representative Quote: In addition to public comments provided after the release of the DEIS, all public testimony provided on this issue during the ten to twelve years prior to the release of the DEIS should be considered in developing alternatives.

Response:

The park has treated all comments received during the public comment period equally. NPS may not give more weight to local comments versus non-local comments. GGNRA is a national park unit and by law must accept and treat comments with equal deference regardless of locality. The park is unable to re-open the public comment period from 2001, which is not part of the current NEPA planning process. The public had the opportunity to issue comments on the draft plan/EIS from January 14, 2011 through May 30, 2011.

Concern ID: 29526
CONCERN STATEMENT: Any changes to the draft plan/EIS should go through public review.

Representative Quote(s): **Corr. ID:** 4118 **Organization:** *Not Specified*
Comment ID: 208515 **Organization Type:** Unaffiliated Individual
Representative Quote: Changes to any plans determined as part of the current process should also include public review and comment session, versus becoming park rule as a result of park restriction enforcement mandates

Response: Since changes were made to the preferred alternatives, the public is invited to comment on the draft plan/SEIS.

Concern ID: 41739
CONCERN STATEMENT: Commenters request that the park publish the public comments in the draft plan/EIS or that an independent review of the comments be completed (specifically, that comments are not merely reviewed by Park staff since NPS wrote the draft plan/EIS which represents a conflict of interest) or that the cost of the draft plan/EIS and the number of hours charged by employees for this draft plan/EIS be made public.

Representative Quote(s): **Corr. ID:** 1451 **Organization:** *Not Specified*
Comment ID: 199728 **Organization Type:** Unaffiliated Individual
Representative Quote: I am very concerned that NPS/GGNRA will ignore public comment. For this process to be considered valid, you must be transparent. I strongly request (insist if I may) that you publicly publish all comments received.

Corr. ID: 4235 **Organization:** Save Off Leash, SFDOG, Sierra Club, Native Plant Society
Comment ID: 208599 **Organization Type:** Unaffiliated Individual
Representative Quote: The NPS must have non-GGNRA-staff or GGNRA-associated researchers to independently analyze and review the public comment and to independently determine how the Alternatives must be changed (or even if the DEIS should be thrown out and the whole process started over) as a result of the public comment.

Corr. ID: 4235 **Organization:** Save Off Leash, SFDOG, Sierra Club, Native Plant Society
Comment ID: 208597 **Organization Type:** Unaffiliated Individual
Representative Quote: We demand an independent review of the comments from the public. The GGNRA has said they will give the public comments to their own staff -- the very same people who did the flawed, biased research that the GGNRA uses to justify restricting off-leash -- to decide if the criticisms of that work is valid. This is an egregious conflict of interest.

Response: The NPS received nearly 5,000 pieces of correspondence during the comment period from over 31 states. A public comment analysis report was prepared and will be posted on the NPS PEPC website:

<http://www.nps.gov/goga/parkmgmt/dog-management.htm>.

There is no conflict of interest in an agency writing an EIS and reviewing / addressing public comments, rather, this is what is required under NEPA and it is implementing regulations at 40 CFR Part 1500.

Concern ID:
CONCERN
STATEMENT:

41745

There are questions concerning the draft plan/EIS/FEIS distribution, specifically, why wasn't the draft plan/EIS available in other languages or why wasn't a request sent out to the mailing list asking the public which format they would like to receive the draft plan/EIS in (hard copy vs. electronic) to save resources?

For representative quotes, please see Concern Statements 29516 (PS1000), Comment 207685 and Concern 29519 (PS1000), Comment 208560.

Response:

A notice of availability stating that the draft plan/EIS was available for public review was sent to the dog management project mailing list, to attendees of the public meetings, park partners, and others listed on the park's general public mailing list. To reduce the use of resources, the public was invited to view the document and comment online using the park Planning, Environment, and Public Comment website. The park's dog management plan mailing list contains over 7000 individuals, organizations, and government agencies; printed hard copies for everyone on the mailing list would be cost prohibitive. However, hard copies of the document were made available to individuals that specifically requested them and were also placed in local public libraries; approximately 250 hard copies were printed and 600 CDs were burned. Due to limited resources, the translation of a document this size would be cost prohibitive.

RB1300 – RODEO BEACH: DESIRE OTHER ALTERNATIVE

Concern ID:
CONCERN
STATEMENT:

29326

Commenters support alternative A because it allows the most off-leash dog areas, including the southern beach area almost exclusively used by dog walkers or also adding more dog friendly beaches in the area.

Representative Quote(s): **Corr. ID:** 439 **Organization:** *Not Specified*
Comment ID: 181685 **Organization Type:** Unaffiliated Individual
Representative Quote: Homestead Valley: Alternative A

Stinson Beach: Where's the beach? - I got nothing!

Muir Beach: Alternative A - I will stay out of the creek; I like salmon too!

Rodeo Beach: Alternative A, or the preferred alternative would be OK, but better if I could walk the entire beach.

Chrissy Field: Alternative A

Baker Beach: Alternative A

Marin Headlands : Alternative A

Ocean Beach: ALternative A

Corr. ID: 494 **Organization:** *Not Specified*
Comment ID: 181850 **Organization Type:** Unaffiliated Individual
Representative Quote: I realize that the main part of Rodeo Beach is not on the list for closure to dogs, but closing the south part of the beach makes no sense. Especially in the early morning, the south beach is almost solely used by dog owners.

Corr. ID: 3788 **Organization:** *Not Specified*
Comment ID: 205326 **Organization Type:** Unaffiliated Individual
Representative Quote: I think the least the change , Alternative A, should also be applied at Rodeo Beach. It's a nice big place with plenty of room on the beach for all.

Corr. ID: 4626 **Organization:** Marin Unleashed
Comment ID: 264271 **Organization Type:** Non-Governmental
Representative Quote: Retain the 1979 Pet Policy (Alternative A) in the following areas:
Rodeo Beach (north and south ends)

Response: Alternative A was not selected as the preferred alternative for Rodeo Beach. However, the preferred alternative was modified to increase the size of the ROLA on the beach. Please see chapter 2, Preferred Alternative for Rodeo Beach for additional rationale.

Concern ID: 29328
CONCERN STATEMENT: Commenters support alternative D because it is the most protective of natural resources and visitor safety.

Representative Quote(s): **Corr. ID:** 4315 **Organization:** State of California Department of Fish and Game
Comment ID: 209389 **Organization Type:** State Government
Representative Quote: 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.

Response: Alternative D was not selected as the preferred alternative for Rodeo Beach. The preferred alternative would allow off-leash dog walking on a beach where shorebird activity is relatively low. South Rodeo Beach would not be open to dog walking. Please see chapter 2, Preferred Alternative for Rodeo Beach for additional rationale.

RB1400 – RODEO BEACH: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29330
CONCERN STATEMENT: ROLAs - Commenters suggested changing the location of the ROLA at Rodeo Beach. Suggestions included placing a ROLA on the central and southern end of the beach, moving the northern boundary of the current ROLA 50 meters, or placing the ROLA north of the bridge. Commenters also suggested that a fence should be placed around Rodeo Lagoon to keep dogs and visitors out.

Representative Quote(s): **Corr. ID:** 678 **Organization:** *Not Specified*
Comment ID: 182640 **Organization Type:** Unaffiliated Individual
Representative Quote: Rodeo Beach:
I think that the planners got this beach plan backwards. It makes more sense to me to have a small section of beach near the parking lot that only allows leashed dogs and then allow unleashed dogs on the central and southern ends of the beach.

Corr. ID: 1074 **Organization:** *Not Specified*
Comment ID: 192206 **Organization Type:** Unaffiliated Individual
Representative Quote: Please let us continue to exercise our dogs off leash at Muir, Rodeo and Stinson Beaches. Dogs and their owners really enjoy the freedom of off-leash play in the sand and water. We have far too few places where a dog can play off leash as it is. Most dog parks are small and confined spaces without adequate shade trees and access to water (e.g. Larkspur and San Anselmo).

Corr. ID: 1691 **Organization:** *Not Specified*
Comment ID: 191095 **Organization Type:** Unaffiliated Individual
Representative Quote: Because the "surfer" parking lot is being removed above Rodeo Beach by Fort Cronkite, it would be better for the future bird populations at that wetlands-to-be if the ROLA on Rodeo Beach were constrained from a further 50 meters on the north side. Preferably, no dogs on the beach, but the preferred alternative could be improved if the northern boundary of that ROLA were moved south 50 meters.

Corr. ID: 2012 **Organization:** *Not Specified*
Comment ID: 193221 **Organization Type:** Unaffiliated Individual
Representative Quote: Rodeo Beach - It's too ambiguous "crest" of beach. Keep Alt. A as ROLA. Even without dogs on this beach stats show low shorebird use due to high #'s of people, kites, football games, etc. Beaches with more than 20 people/km and no dogs still have low shorebird use. DO ADD fence at lagoon keeps adults, children & dogs out of lagoon. Increase enforcement if necessary.

Corr. ID: 2920 **Organization:** Save Our Seashore
Comment ID: 224052 **Organization Type:** Conservation/Preservation
Representative Quote: The Rodeo Beach Preferred Alternative shows a ROLA on virtually of the beach. We do not agree with requiring families with kids and picnic baskets who don't want to deal with dogs to have to trudge to the far end of the beach. We suggest the ROLA should be limited to the half of the beach north of the Bridge as shown as an off-leash zone in Alternative D, using the bridge as a visual "fence" extended with post 'and-cable or post-without-cable to more extensively demarcate the off-leash area.

Corr. ID: 4215 **Organization:** San Francisco League of Conservation Voters
Comment ID: 208894 **Organization Type:** Conservation/Preservation
Representative Quote: Rodeo Beach - we feel that many visitors who may desire a no-dog experience at Rodeo Beach would be unlikely to make their way to Muir Beach. 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. Therefore, we would propose a compromise version of Alternative D: make the beach area north of the bridge a ROLA, and make the area south of the bridge a no dog area. We realize the "line of separation" on the beach would not be able to be clearly marked; however, since the primary beach access is over the bridge, signage can indicate which area is which very clearly, and would be relatively easy to monitor. We support the construction of the proposed fence around the west end of the lagoon in any case.

Response: The preferred alternative was modified to increase the size of the ROLA on the beach. When funding becomes available, an already-approved fence would be installed across the western edge of the lagoon by a separate park project. Please see chapter 2, Preferred Alternative for Rodeo Beach for additional rationale.

Concern ID: 29331
CONCERN STATEMENT: [Time of Day Restrictions - Commenters suggested allowing off-leash dogs on the beach at designated hours of the day. Suggestions included allowing off-leash dogs in the morning hours and during the afternoon hours splitting the beach for off-leash dogs and no dogs.](#)

Representative Quote(s): **Corr. ID:** 1713 **Organization:** *Not Specified*
Comment ID: 191151 **Organization Type:** Unaffiliated Individual
Representative Quote: have been walking on Rodeo Beach since I was 10 years old (1957) and since I was 20 I have been walking dogs there: Hottie, Reicher, Jet, Coco, Willies, Blue, Colby and Lola. I have never seen a dog fight that resulted in anything but a growl. I have never seen a person bitten. Any trace of these dogs is non-existent, and their impact is negligible.

Give the entire beach to dogs in the AM + divide the beach between dogs and humans during the middle of the day - again because by 5p everyone else is gone. At the times of year when one is able to walk the entire beach (both north and south) let dogs walk it. The entire beach is only open a few weeks during the whole year - usually winter.

Corr. ID: 2119 **Organization:** *Not Specified*
Comment ID: 193392 **Organization Type:** Unaffiliated Individual
Representative Quote: Rodeo Beach -
-Off leash 6am-10am Rodeo + S. Rodeo then S. Rodeo no dogs the rest of
the day + Rodeo beach on-leash/off-leash split the rest of the day.

Response: Time of day restrictions can be difficult to enforce; however, this management concept will still remain an option for dog management in the future. Please see chapter 2, National Park Service Preferred Alternative for additional information on time of use restrictions.

SA1100 – SITE ACCESSIBILITY

Concern ID: 29658
CONCERN STATEMENT: The proposed plan at Fort Funston will limit access for elderly and disabled visitors, as well as those families with young children and dogs. The ROLA located on the beach is not large enough, and the sand ladder access is difficult for many elderly people. Commenters felt it would be impossible to access with a dog on leash, as is called for in the proposed plan. The smaller proposed off-leash area is not sufficient for those who cannot reach the beach.

Representative Quote(s): **Corr. ID:** 1076 **Organization:** *Not Specified*
Comment ID: 192207 **Organization Type:** Unaffiliated Individual
Representative Quote: The suggested plan for Funston would not be accessible to disabled people on wheelchairs and canes and for families who bring their kids in strollers. In order to get to the trail where dogs will be only allowed on leash, everyone would have to go through the sandy area or the Chip Trail because the Funston suggested alternative map that was presented at the meeting shows that the paved area that leads to the rest of the trail (Sunset Trail) is off limits to ALL dogs, whether on or off leash. How is someone with a cane or wheelchair who is there with a dog supposed to get to the trail where dogs are allowed on leash? How are people in wheelchairs going to be able to utilize the proposed off leash sandy area when they can't even maneuver in it?

Beach access for off leash dog walking will be extremely difficult for those with canes and inaccessible all together to those who are wheelchair bound. The only access to the beach is down the flight of stairs near the parking lot and down the VERY STEEP sandy beach access trail. That is not practical or safe to anyone who is disabled. So in reality, someone wheelchair bound with a dog really has NO place in Funston to be with an off leash dog. GGNRA should do a review of their plans for Funston to consider disabled people.

Corr. ID: 1379 **Organization:** *Not Specified*
Comment ID: 195256 **Organization Type:** Unaffiliated Individual
Representative Quote: As far as I know, Ft. Funston is the only legal off leash recreation area this side of Carmel, with the exception of Esplanade Beach in Pacifica, which is below the crumbling cliffs, with 70 steep stairs that wash away often, and a beach that all but disappears at high tide. We're

in our 60's, so access is a big deal to us. The proposed off leash area on the beach below the sand ladder will not be of any use to us. Once you reach the bottom of the sand ladder, you have to climb down to the beach or slide down on your butt, and forget about trying to climb back up!

Corr. ID: 3845 **Organization:** *Not Specified*

Comment ID: 208770 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Funston is an extremely important place for my family. I use a wheelchair and have a service dog. Fort Funston is one of the few places with a significant distance of accessible paths and an off-leash area; it is one of the few areas I let my dog off-leash because I am able to travel parallel to him along the paths as he romps. With the proposed changes to off-leash areas at Fort Funston, I will only be able to travel along the perimeter of the area where my dog plays, which will restrict our interaction and enjoyment of the park.

Response:

Following the public comment period, the preferred alternative for Fort Funston was modified to enlarge the upland ROLA to create a corridor from just north of the main parking lot that would extend to, and include, the north beach access trail. The ROLA corridor would incorporate the Chip Trail, and sections of the Sunset Trail, Funston Road and Battery Davis Road - all north of the parking lot. The ROLA would also extend into the disturbed area across from the north beach access trail and would include the north beach access trail. This would allow an access to the beach ROLA without requiring the use of a leash. Please see chapter 2, Preferred Alternative for Fort Funston for details.

Concern ID:

**CONCERN
STATEMENT:**

29659

Commenters addressed issues relating to having ROLAs in sandy areas. Keeping dogs in the wet sand only at the proposed Fort Funston ROLA would present a danger to smaller dogs from proximity to the surf. Having sand ROLAs would preclude use by those who have trouble walking, and often the tide blocks access to a large portion of the beach ROLA. In addition the outfall pipe will block portions of the loop trail proposed. Additionally, the substrates found at the ROLAs on Crissy Field are not suitable for use by those with disabilities; sand is difficult to navigate for unsteady walkers and those in wheelchairs, and the grass on the airfield is uneven.

Representative Quote(s): **Corr. ID:** 843 **Organization:** *Not Specified*

Comment ID: 186218 **Organization Type:** Unaffiliated Individual

Representative Quote: Fort Funston: The beach will be available to us, but the walk down to it, no matter how you go will be on leash. That will not only be difficult, it will be dangerous. Once we are on the beach, they want us to walk only on the wet sand. I want to keep my dogs safe, and with smaller dogs especially, I want to keep them away from the surf most of the time. Also, the beach is not available to us at all times because of the tides.

Corr. ID: 1076 **Organization:** *Not Specified*

Comment ID: 192208 **Organization Type:** Unaffiliated Individual

Representative Quote: Also, the section of the beach [at Fort Funston] that

is suggested for off leash dog walking is only from the staircase of the parking lot to the beach access trail. This stretch of the beach includes the outflow pipe. More often than not, the tide is high at that area and there is no way to get around that outflow pipe. So when tide is high, there's more space that is lost for off leash walking. Sometimes the tide is so high that you can't even access the beach safely in the proposed designated off leash section of the beach.

Corr. ID: 4037 **Organization:** Crissy Field Dog Group
Comment ID: 207193 **Organization Type:** Unaffiliated Individual
Representative Quote: The proposed off leash beach area is not easily accessible as is the main beach. For the past couple of years I've had difficulty walking on the sand on several occasions due to physical limitations, and having to walk out to the proposed off-leash area is simply not possible for me in many instances. I can't help but to wonder what legally disabled people are supposed to do to get down to that part of the beach. I realize dogs can go off leash on the grass, which is more accessible. However, my dog has a bad shoulder that does not bother him when he runs on the sand, but becomes a problem on the grass area.

Corr. ID: 4038 **Organization:** *Not Specified*
Comment ID: 207212 **Organization Type:** Unaffiliated Individual
Representative Quote: Moreover, the GGNRA's preferred alternative for Crissy Field would severely and unfairly penalize senior citizens and those who rely on using the East Beach because of its abundant nearby parking and its ideal environment for exercising their dogs. The GGNRA should not, and cannot realistically, expect us to use only the western beach for walking on the beach and exercising our dogs off leash. That beach is essentially inaccessible due to the great distance away of available parking. The GGNRA should not expect senior (or disabled) citizens to park on the other side of the street and then have to walk all the way across the grassy area just to get to the beach where our dogs can chase balls in the surf and walk with us in the sand. Because of the uneven terrain and hidden holes in the field, the grassy areas is also dangerous for dogs to run on, and for humans to walk on. Because of this danger, that grassy field is ABSOLUTELY NOT a feasible solution for exercising dogs off leash.

Response: The upland ROLA at Fort Funston has been extended to include the northern beach access trail and will include sections of the paved Sunset Trail. For details, please see chapter 2, Preferred Alternative for Fort Funston. If funding becomes available, an accessible beach mat would be installed at Crissy Field to allow for easier access to the Central Beach ROLA. For details, please see chapter 2, Preferred Alternative for Crissy Field.

Concern ID: 29660
CONCERN STATEMENT: Having only limited parking adjacent to the proposed ROLA at Crissy Field, and the distance from the parking to Central Beach will make it difficult for elderly, disabled visitors, and families with small children to access these areas, unlike the East Beach, which is close to parking.

Additionally, the facilities and beach at East Beach were more beneficial to those with children than the central beach.

Representative Quote(s): **Corr. ID:** 2813 **Organization:** *Not Specified*
Comment ID: 201116 **Organization Type:** Unaffiliated Individual
Representative Quote: The Preferred Alternative does not address needs of two user groups: seniors and families with children and dogs. Elderly people with dogs, and families with both children and dogs do not have a viable alternative in this plan. The distance to the Central Beach makes it difficult for frail seniors and impossible for families with kids and dogs to manage to move themselves and their gear (strollers, beach stuff) from the parking lot over the bridge to the beach. Solution: same as above: full weekday use and timed use on the weekends.

Corr. ID: 4038 **Organization:** *Not Specified*
Comment ID: 207206 **Organization Type:** Unaffiliated Individual
Representative Quote: I am also a senior citizen, 67 years old. I need to have parking close to the East Beach available for me and my dogs, because it is too far for me to walk to Crissy Field or to walk blocks from far away parking. One of the major reasons I walk my dogs at Crissy Field is the availability of nearby parking. (One of the major defects of the preferred alternative for Crissy Field is the lack of adequate parking near the area where dogs would be permitted off leash.)

Corr. ID: 4441 **Organization:** *Not Specified*
Comment ID: 209381 **Organization Type:** Unaffiliated Individual
Representative Quote: Moreover, there is inadequate consideration of the impact of restricting off leash dogs on east beach at Crissy Field on the families that gather there for recreation. During many months of the year central beach is not safe because of the high tides. The proposal does not adequately investigate the impact on families of having to use Central Beach year round rather than east beach. There is also no science based explanation for moving off leash dogs off east beach. Please evaluate these alternatives and impacts.

Response: Please see chapter 2, Preferred Alternative for Crissy Field for rationale of no dog walking at East Beach. When funding becomes available, an accessible beach mat would be installed at Crissy Field's Central Beach to allow for easier access to the ROLA.

Concern ID: 29665
CONCERN STATEMENT: Issues for handicapped users are not addressed at Mori Point. Cutting off the trail from Pollywog Path (the trail running north from Old Mori Road) would cut off access to the adjacent neighborhood, limiting access to many elderly people and young children. Lishumsha Trail is particularly smooth, making it a good access trail for disabled visitors.

Representative Quote(s): **Corr. ID:** 1924 **Organization:** *Not Specified*
Comment ID: 192260 **Organization Type:** Unaffiliated Individual
Representative Quote: Please leave Mori Point as it is (Alt. "A").

Handicap issues - not addressed!

No off-leash reasonable walking in San Mateo Count!

Corr. ID: 3726

Organization: *Not Specified*

Comment ID: 202345

Organization Type: Unaffiliated Individual

Representative Quote: I am writing to oppose the GGNRA draft dog management plan alternatives that further restrict or ban dogs in open spaces.

1) Mori Point in Pacifica. The work GGNRA has been doing in this park has been fabulous. Though you've cut out some of the trails we used to walk on, what you've done has made the park more accessible to more people (instead of my secret almost private place, which I do admittedly miss). However, the plans to close off upper Mori Trail and Lishumash trail are ill-advised. These trails provide a more rugged experience that dogs and owners need, move us away from people with little kids and strollers, and give people more exercise and dogs more places to sniff, without harming the vegetation or affecting wildlife. Your draft plan also cuts off all access to the Headlands, which is odd and unfair. It prevents us from the longer walks along the cliffs heading south, and from meeting up with the trail that leads to the Quarry, both popular and beautiful walks. Furthermore, the plan to close off the trail that leads north from lower Mori Road just before we reach the new ponds (this path fronts backyards), will cut off easy access from the entire neighborhood. I meet many elderly people, people in wheelchairs or with canes, and people with young kids who enter the park through this trail. Closing it off will cause all the people who live there to either have a much longer walk to the main entrance by the Moose Lodge, or they will have to drive there, increasing parking congestion amid much more inconvenience.

Response:

After receiving public comments, the preferred alternative for Mori Point was modified to include additional on-leash dog walking opportunities. Please see chapter 2, Preferred Alternative for Mori Point for more detail on locations.

Concern ID:

**CONCERN
STATEMENT:**

29667

Some commenters noted that for disabled visitors, particularly those with stability concerns, it was very difficult to find areas where they could access the park without off-leash dogs. The preferred alternative would open up more areas of the park to those with disabilities, and would comply with the ADA. Alternately some commenters questioned whether the proposed plan was in accordance with ADA standards, and noted that it did not accommodate disabled users and that these users need to have ample space where they can easily access off-leash areas for recreation with their dogs. These visitors need to have good trails and areas to recreate and exercise with their dogs. Popular areas for handicapped individuals include Milagra Ridge, Fort Funston, and Fort Mason. It is difficult for some visitors, particularly those that are disabled or elderly, to adequately control their dogs on leash. Having dogs on leash also limits the exercise dogs can obtain to the exercise abilities of their owners, which may not be sufficient.

Representative Quote(s): **Corr. ID:** 2039 **Organization:** *Not Specified*
Comment ID: 193280 **Organization Type:** Unaffiliated Individual
Representative Quote: WRT People of limited mobility: I recently had a stroke. It was very difficult to find a park free of dogs off leash where I could walk (unsteadily) with safety. Park are for people first (well or sick).

Corr. ID: 2106 **Organization:** *Not Specified*
Comment ID: 193364 **Organization Type:** Unaffiliated Individual
Representative Quote: Off leash access fo the disabled access trails is critical to dog owning persons with some key access difficulties, where the individual has a well trained dogs that is necessary for enjoyment of the person on the walks and for safety reasons.

Corr. ID: 2167 **Organization:** GGNPC
Comment ID: 200592 **Organization Type:** Unaffiliated Individual
Representative Quote: I would like to speak in favor of the GGNRA's preferred alternative in its draft DMP.
The preferred alternative will make it possible for my son to visit portions of GGNRA lands where off leash dog use is currently allowed that we have never been able to visit. Such a change in land use management is fully consistent with and in fact mandated by federal law including but not limited to the Americans with Disabilities Act (ADA).

Corr. ID: 3399 **Organization:** *Not Specified*
Comment ID: 203140 **Organization Type:** Unaffiliated Individual
Representative Quote: A leash rule may be an easy answer but it is far from fair or right. The nature of the experience with the dogs off-leash - in which we are letting the dogs socialize, run, play, etc. - fosters a type of camaraderie that is increasingly rare in today's society, and it would be a great loss to our community were it to become unavailable. A small minority of owners may not be as responsible as they need to be, but to deny all dogs the opportunity to run free is unconscionable. They simply cannot get enough exercise if they are always leashed. When the rights of some are restricted, it is called discrimination. How can it be that a few people can disallow the many access to a public space and restrict their freedom? When one space becomes restricted what's to stop the spread of restriction?

I am angry over how discriminated against we dog owners are. What other group is consistently labeled by the actions of a few?

Corr. ID: 3781 **Organization:** *Not Specified*
Comment ID: 205178 **Organization Type:** Unaffiliated Individual
Representative Quote: Most of the recreational visitors to Ft. Funston will therefore be extremely negatively impacted by the preferred alternative at Ft. Funston. My wife is disabled. I will not be able to walk with my wife and our off leash dog, (or on leash dog) at Ft. Funston with your preferred alternative.

Corr. ID: 4218 **Organization:** Save Off Leash, SFDOG, Sierra Club, Native Plant Society

Comment ID: 208916 **Organization Type:** Unaffiliated Individual
Representative Quote: The GGNRA states that the disabled are afraid of dogs. However, many of the people who use these areas are there because of disabilities. People with diabetes, arthritis, and depression walk to keep their conditions under control. People with mobility problems go to Milagra, Funston, Fort Mason and other places because they can recreate more easily with their dogs on the paved surfaces. People with service dogs go to these areas so that their hard-working dogs can take a needed break.

Corr. ID: 4416 **Organization:** *Not Specified*
Comment ID: 207196 **Organization Type:** Unaffiliated Individual
Representative Quote: There is absolutely no way any disabled senior could manage the steps down to the [Fort funston] beach with a leashed dog. Well, there is no way we could manage the steps without a dog, as the stairs are inaccessible to any of us who have trouble walking. You can take a cane, walker, or wheel chair along the path at Fort Funston, as many of us do, but a walker or wheel chair can not go up and down stairs. I don't know what the ADA requirements are for a public park, but Funston is currently accessible as it is now, and will be completely inaccessible if the plans change as proposed.

Corr. ID: 4486 **Organization:** *Not Specified*
Comment ID: 209403 **Organization Type:** Unaffiliated Individual
Representative Quote: As an individual with limited mobility, I must point out that the plan discriminates against handicapped dog owners, and is thus in violation of the ADA.

Response:

Following the public comment period, the preferred alternatives for some sites were changed in order to provide more dog walking opportunities for visitors with disabilities. Changes included adjusting the upland ROLA at Funston to allow off-leash access the beach, hardening surfaces and installing accessible beach mats when funds are available. Additionally, there are accessible on-leash areas in the plan for disabled visitors who wish to visit the parks without encountering off-leash dogs. The NPS is currently revising its regulations to be consistent with Department of Justice regulations covering the ADA (28 CFR 36). Please see chapter 2 for more detail.

SB1300 – STINSON BEACH: DESIRE OTHER ALTERNATIVE

Concern ID: 29379
CONCERN STATEMENT: Commenters support alternative A for Stinson Beach.

Representative Quote(s): **Corr. ID:** 10 **Organization:** *Not Specified*
Comment ID: 181415 **Organization Type:** Unaffiliated Individual

Representative Quote: the following are my comments on some of the various areas under review.

Stinson Beach: Alt A.

Response: Alternative A was not selected as the preferred alternative for Stinson Beach; however the preferred alternative includes the details of alternative A and was modified to include an on-leash path or corridor between the north parking lot and the adjacent county section of the beach at Stinson, Upton Beach. Please see chapter 2, Preferred Alternative for Stinson Beach for additional rationale.

Concern ID: 29380
CONCERN STATEMENT: Commenters support alternative D for Stinson Beach.

For representative quote, please see Concern 29230 (MH1300), Comment 205586.

Response: Alternative D was not selected as the preferred alternative for Stinson Beach in order to provide an on-leash dog walking area and retain the prohibition of dogs on a designated swimming beach. Please see chapter 2, Preferred Alternative for Stinson Beach for additional rationale.

SB1400 – STINSON BEACH: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29381
CONCERN STATEMENT: Commenters suggested adding a ROLA to half of Stinson Beach. Other commenters expressed interest in creating an off-leash area that abuts neighboring Upton beach, which allows dogs, to resolve issues with visitors parking at Stinson and issues with visitors illegally crossing to Upton. Other commenters felt that there should be a ROLA area, as well as an area that does not allow dogs, on Stinson Beach.

Representative Quote(s): **Corr. ID:** 438 **Organization:** *Not Specified*
Comment ID: 181674 **Organization Type:** Unaffiliated Individual
Representative Quote: Re: Stinson beach - I am not sure why they want the entire beach to be closed for dogs, but really, there needs to be an area for dogs, and an area that does not allow dogs. A compromise is a real solution, not this kind of one-way proposal that keeps dog owners from having reasonable access to public beaches.

Corr. ID: 1531 **Organization:** *Not Specified*
Comment ID: 190707 **Organization Type:** Unaffiliated Individual
Representative Quote: At Stinson Beach Alternative A allows only for dogs on-leash in the parking areas. This is the best alternative presented, but there should be another alternative that allows dogs off leash on part of the beach

Corr. ID: 4687 **Organization:** County of Marin Dept. of Parks and Open Space
Comment ID: 227451 **Organization Type:** Non-Governmental
Representative Quote: Upton Beach dog users are adjacent residents, and those who were Stinson Beach bound but were prohibited by dog restrictions. These redirected users park their cars in the GGNRA lot, cross an unsanctioned federal area with their dogs to the county beach.

Managing Upton Beach is a challenge for the county. The county has two ideas to improve management, health and safety, and visitor enjoyment of this area. The county requests that a limited segment (to be determined) on the northernmost edge of Stinson where it abuts Upton be designated for dogs. This would create a sanctioned area on the federal beach near the parking lot, and relieve pressure on the relatively limited area available at Upton. It would acknowledge and accommodate those dogs that GGNRA rangers redirect to the county beach. This also would help mitigate displacement from Muir Beach.

Response: A ROLA 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 section of Stinson Beach - Upton Beach. Please see chapter 2, Preferred Alternative for Stinson Beach for additional rationale.

Concern ID: 31840
CONCERN STATEMENT: [On-Leash - Commenters suggested allowing on-leash dogs on the beach.](#)

Representative Quote(s): **Corr. ID:** 841 **Organization:** *Not Specified*
Comment ID: 186204 **Organization Type:** Unaffiliated Individual
Representative Quote: Stinson Beach: please keep this as on-leash access. There are enough people using the beach that a leash-law is justified here.

Response: On-leash dog walking would not be established at Stinson Beach since dog walking on swimming beaches is prohibited 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. 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 Upton Beach. Please see chapter 2, Preferred Alternative for Stinson Beach for additional rationale.

SH1300 – SUTRO HEIGHTS: DESIRE OTHER ALTERNATIVE

Concern ID: 29264
CONCERN STATEMENT: [No-Dog Experience - Commenters are concerned about the number of dogs at Sutro Heights and would prefer a no-dog experience, alternative D.](#)

Representative Quote(s): **Corr. ID:** 1544 **Organization:** *Not Specified*
Comment ID: 190727 **Organization Type:** Unaffiliated Individual
Representative Quote: Sutro Hts.

Everyone dog + otherwise confined to trails only + no dogs in picnic areas.

Prefer Map 14D

Corr. ID: 4215 **Organization:** San Francisco League of Conservation Voters

Comment ID: 208900 **Organization Type:** Conservation/Preservation
Representative Quote: Sutro Heights Park - The Preferred Alternative, which would allow on-leash dogs through the park (with one small exception), amplifies the problem cited at Lands End and Fort Point (and Fort Funston) - that is, the inability to have a no-dog experience. This park is a unique unit of the GGNRA, and so provides an experience not available in other units. Because it is a developed site, the environmental impacts of dog activity are far fewer. Nonetheless, we would prefer to see a greater accommodation to those visitors who would prefer a no dog experience, which 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 on-leash dog walking in areas except for the gardens. Please see chapter 2, Preferred Alternative for Sutro Heights Park for additional rationale.

Concern ID: 41854
CONCERN STATEMENT: [ROLA - Commenters want all of San Francisco, including Sutro Heights, to continue off-leash dog walking and thus they prefer alternative A.](#)

Representative Quote(s): **Corr. ID:** 1685 **Organization:** *Not Specified*
Comment ID: 191085 **Organization Type:** Unaffiliated Individual
Representative Quote: I believe that all of the San Francisco County should stay with Alternative A. I feel that cutting back the area we now have would be a disaster. There are almost 200,000 dogs in S.F. alone. We need more areas to walk dogs off leash, not less

Response: ROLAs 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.

SH1400 – SUTRO HEIGHTS: SUGGEST CHANGE IN ALTERNATIVE

Concern ID: 29266
CONCERN STATEMENT: [Commenters support the preferred alternative, with some changes. Specifically, commenters would like dog walkers to be restricted to one dog per visitor and compliance to be increased to 95 percent, instead of 75 percent.](#)

Representative Quote(s): **Corr. ID:** 4410 **Organization:** *Not Specified*
Comment ID: 206953 **Organization Type:** Unaffiliated Individual
Representative Quote: Sutro Heights Park ' We support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Response: The compliance-based management strategy has been removed from the draft plan/EIS and replaced with a monitoring-based management strategy, based in part on comments received from the public. Please see chapter 2, monitoring-based management strategy for a description.

TE2010 – THREATENED AND ENDANGERED SPECIES: AFFECTED ENVIRONMENT

Concern ID: 30405
CONCERN STATEMENT: Some commenters acknowledge that they have observed that dog owners encourage or allow their dogs to chase after snowy plovers, and that off-leash dogs present a threat to the snowy plover. These commenters urge the park to protect listed species at GGNRA, which they stated is a mission of the GGNRA. Alternately, other commenters do not agree that off-leash dogs are affecting the snowy plover, and some commenters suggest that other disturbances, such as humans, natural predators, horses, and ATVs, affect the snowy plover.

Representative Quote(s): **Corr. ID:** 658 **Organization:** *Not Specified*
Comment ID: 181512 **Organization Type:** Unaffiliated Individual
Representative Quote: We have long believed that unconstrained dog access to the GGNRA is inappropriate for the mission of protecting and encouraging native flora and fauna, and often very unpleasant for other recreational users of the GGNRA

Corr. ID: 1056 **Organization:** *Not Specified*
Comment ID: 192152 **Organization Type:** Unaffiliated Individual
Representative Quote: I have read a Bay Bird Survey that indicates the real problem with the Western Snowy Plover is that the California Gull is eating their eggs in the nesting areas. This seems consistent with what I have observed on Ocean Beach where the smaller birds are harassed more by gulls and ravens than dogs and people. I think the shorebirds are also more disturbed by the Park Police vehicles on the beach than pedestrians with leashed dogs. I believe the GGNRA is acting more out of fiscal preference than really trying to balance the needs of the shorebirds and the residents. It's just easier to ban dogs altogether than to work directly to fine and remove the minority of beach users who are irresponsible. Why doesn't the GGNRA show us some scientific basis for this proposed regulation?

Corr. ID: 2053 **Organization:** *Not Specified*
Comment ID: 193308 **Organization Type:** Unaffiliated Individual
Representative Quote: Ocean Beach comments: re protecting snowy plovers: what keeps feral cats from colonizing near important ground-nesting habitat? Could dogs off-leash help discourage feral cat colonization? The issues for protecting snowy plovers must include the impact of dog

management on unintended consequences, such as a potential rise in feral cat colonies. Recommend base line studies now so future management is evidence-based.

Corr. ID: 2558 **Organization:** *Not Specified*
Comment ID: 195651 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to help protect wildlife from inappropriate activities such as that represented by off-leash dogs. These activities have resulted in habitat encroachment and wildlife harassment by dogs. It has been reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival. Please give them a chance to thrive.

Corr. ID: 2705 **Organization:** National Parks Conservation Society
Comment ID: 195552 **Organization Type:** Unaffiliated Individual
Representative Quote: Golden Gate Park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers and more endangered species, so, why are dogs allowed to run loose, in this fragile area?
Simple solution, is to restrict dogs to a leash.
Also, stop letting children chase the birds, as well!

Corr. ID: 3306 **Organization:** *Not Specified*
Comment ID: 202874 **Organization Type:** Unaffiliated Individual
Representative Quote: The dog people have plenty of places to run their pets. Please protect the endangered and threatened species from the humans and their pets.

Corr. ID: 3737 **Organization:** SF Dog Owners Group
Comment ID: 204261 **Organization Type:** Unaffiliated Individual
Representative Quote: Relative Impacts of Dogs Compared to Other Causes - The DEIS considers dogs as if they are the only thing in the GGNRA. There is no context. For example, there is no discussion of impacts of natural predators on snowy plover birds and how that compares to those from dogs, or how do disturbances from people compare to disturbances from dogs. Without this context, the DEIS cannot say restricting dogs will have a significant positive impact on species. Horses, humans and ATV's have a MUCH higher impact. Lack of Site Specific Information - The DEIS fails to document actual impacts on resources at each site. DEIS assumes that if an impact "could" occur, it does occur at each site, even though there is little evidence of actual impacts documented at each site. If the DEIS cannot document actual impacts, then they cannot restrict access

Corr. ID: 4021 **Organization:** *Not Specified*
Comment ID: 206925 **Organization Type:** Unaffiliated Individual
Representative Quote: 8) The GGNRA has not taken any other action to protect plovers, despite clear opportunities to do so.
During the recent Cosco Busan oil spill, the GGNRA quickly erected floating booms to keep oil from entering the Crissy Field lagoon at the

eastern end of Crissy Field, yet made no attempt to similarly protect the plover area at the western end of the beach. The oil posed a significant risk to the plovers, yet the GGNRA did nothing to protect them from it. Indeed, oiled plovers have been reported in the GGNRA. The GGNRA has allowed sporting events like the 2006 Turkey Trot to proceed, with the result that at least 1000 people (more likely 1500) walked or ran through the plover protection area on Ocean Beach. Park rangers routinely drive four-wheel drive cars and trucks through the Ocean Beach plover protection area while pursuing people with offleash dogs.

Corr. ID: 4442 **Organization:** San Francisco Dog Owners Group

Comment ID: 264242 **Organization Type:** Non-Governmental

Representative Quote: There is no evidence provided in the DEIS to support the claim that dogs chasing the plovers has an impact on the survival of the species.

There is no evidence that plover populations will experience any significant benefits from the Preferred Alternative compared to the No Action Alternative.

Response:

As stated and acknowledged in the draft plan/EIS, there have been multiple instances at GGNRA where dogs have flushed or chased shorebirds or snowy plovers at Ocean Beach and Crissy Field as documented in NPS monitoring reports by the GGNRA Natural Resources Division (NPS 2008e; Hatch et al. 2006, 12; Hatch et al. 2007, 4-6; Hatch et al. 2008, 2-4). Impacts to snowy plovers as a result of dogs are described in detail in the draft plan/EIS. While the draft plan/EIS adds specific, enforceable guidelines for the proposed ROLAs, no ROLAs are proposed in snowy plover areas. The GGNRA enabling legislation (abbreviated version) does include the mandate for the preservation of natural resources, which includes the protection of listed species: "In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the 'recreation area') is hereby established. In the management of the recreation area, the Secretary of the Interior (hereinafter referred to as the 'Secretary') shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this Act, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area."

The preferred alternative protects listed species and their habitat by not allowing dogs in sensitive areas. Specifically, the SPPA at Ocean Beach and the WPA at Crissy Field will change from allowing on-leash and off-leash dogs seasonally to not allowing dogs at all to protect the snowy plover and other shorebirds.

Concern ID:
CONCERN
STATEMENT:

30408

Commenters do not agree that dogs are impacting the California red-legged frog or the San Francisco garter snake. Many commenters did not agree with the impact analysis for these species.

Representative Quote(s): **Corr. ID:** 4126 **Organization:** *Not Specified*

Comment ID: 208548 **Organization Type:** Unaffiliated Individual

Representative Quote: The red-legged frog is nocturnal and is well hidden during the day. Field biologists have a difficult time locating unless there is a radio transmitter attached to the frog. The SF garter snake is also very elusive and stays well within cover.

I think there is a slim to none chance that my dog "may" or "could" disturb one of these animals. They would be gone long before hand at first human disturbance. The scientific community at large acknowledges the most critical habitat for these animals in San Mateo County is located on privately held lands.

Corr. ID: 4243 **Organization:** *Not Specified*

Comment ID: 209223 **Organization Type:** Unaffiliated Individual

Representative Quote: I have to ask what EXACTLY are the "current conditions" and what EXACTLY are the park resources and "values" that are in danger of "not being available for enjoyment by future generations"? The Mission Blue Butterfly? A garter snake? The snowy plover? Coyotes? Certain plant species?

For example, I was informed by one of the NPS employees at the Cabrillo Elementary School meeting that a species of garter snake is "endangered" at Mori Point in Pacifica. I find this claim dubious at best. Even if true, I find that no reason for alarm. I have seen plenty of the snakes in question and I know that they tend to thrive near bodies of water due to the fact that the frogs these snakes eat also thrive there. I also know that these areas are already bordered or fenced off adequately enough, so that is no reason to make Mori Point dog free or even leash only. I think everyone needs to keep in mind that many of the areas in question did fine WITHOUT any environmental management for decades/eons, and the balance of nature is NOT going to be thrown out of equilibrium just because a few dogs like to chase balls, sticks, rabbits, etc., dig holes (which very few dogs engage in, especially if allowed to run free) run free, bark, or defecate randomly.

Corr. ID: 4650 **Organization:** *Not Specified*

Comment ID: 227747 **Organization Type:** Unaffiliated Individual

Representative Quote: There is no evidence other than speculation that dogs have had or will have any impact on the San Francisco Garter Snake, particularly in comparison to other park activities such as the park service using vehicles for plant restoration or patrols or bicyclists. According to the US Fish & Game 5 year summary and evaluation report at http://ecos.fws.gov/docs/five_year_review/doc774.pdf, dogs are not mentioned nor listed as even a remote threat unlike cars and bicycles have been known to kill individuals. Real impacts were issues such as 1) loss of open spaces to construction, 2) loss of grasslands (due to

stopping grazing and fire suppression that allows for denser vegetation growth), and 3) illegal specimen collection.

Response:

See response to Concern ID: 30391 regarding dogs as a contributing factor to impacts associated with wildlife [and listed species] and how potential impacts to listed species were described using LE data (leash law violations and warnings, citations, and pet waste removal violations) in combination with "best professional judgment of park staff, experts in the field, recovery plans and actions for listed species, ongoing data collection for other projects, and other supporting literature."

Impacts on special-status species not only include harassment, injury, or death, but secondary impacts such as changes in the amount and connectivity of special-status species habitat, integrity of the habitat (including past disturbance) and populations, and the potential for increased/decreased disturbance and number of individuals. Impacts were determined by examining the potential effects of dog walking activities on special-status species, their habitats, or the natural processes sustaining them as well as responses to disturbance by dogs.

During the past six years the park staff has amassed as much scientific and technical information as could be found on dog management-related topics. Topics for which information was collected include dog management policies from a variety of jurisdictions, and literature related to dog interactions with wildlife, diseases, and waste issues. A detailed literature review was conducted (and has been updated as a result of public comments) to describe impacts on natural resources, including special-status species from dogs. The results of this literature review provide a general nexus for dog-related impacts to vegetation, wildlife, and special-status species. It is stated in the Special-Status Species section of chapter 4, that direct impacts to the CA red-legged frog or the SF garter snake have not been studied at GGNRA sites and peer-reviewed literature does not exist regarding the impact of dogs on these reptilian or amphibian species. As required, the existing credible scientific literature was discussed in detail and the potential impacts were described as a result of this information.

As stated in the Special-Status Species section of chapter 4, California red-legged frog life stages that could be affected by dogs include eggs, juveniles, and adults. Eggs could be affected by trampling from off leash dogs, as has been documented at a pond in Pacifica, California by the City of San Francisco in San Mateo County (Fong 2010). Frog eggs, juveniles, and adults could be affected by dogs through occasional habitat disturbance, such as trampling vegetation along the water/wetland edges, or by behavioral disturbance, such as injuring or causing mortality to individuals of the species in these water bodies. Impacts are generally localized, but could constitute a permanent loss if frog eggs are crushed as a result of disturbance by dogs

As stated in the Special-Status Species section of chapter 4, the behavior of the San Francisco garter snake could be directly affected by dogs through capture or digging if snakes are basking on warm surfaces, such as trails, or

burrowing in upland areas. The snake could be indirectly affected if avoidance of preferred habitat occurs due to dog presence at the site or if changes to the California red-legged frog population occur.

Concern ID:
CONCERN
STATEMENT:

30409

Listed Plants: it has been suggested that since the SF lessingia is not present at Fort Funston there should be no impacts to this plant by dogs, and that a fence at this site could protect any listed species. Commenters suggested that dogs do not impact/trample lupine plants, the plants do not exist at certain sites, and/or that impacts are not evidence-based. Additionally, commenters noted that there is no evidence indicating the presence of Hickmans potentilla in the GGNRA, and that it should be removed from discussion of special status species.

Representative Quote(s): **Corr. ID:** 1483

Organization: *Not Specified*

Comment ID: 191259 **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.) Also on the Oakwood Valley Trail, your policy indicates that you want to protect the Mission Blue Butterfly habitat. No lupine grows on either the north or south side of the loop (and I believe there was an attempt by the park service to grow lupine at that site.)

Corr. ID: 4583

Organization: *Not Specified*

Comment ID: 210000 **Organization Type:** Unaffiliated Individual

Representative Quote: There is real irony here. DEIS/GGNRA claims off-leash dogs will have adverse impacts on Lessingia at Fort Funston, where there is no Lessingia and no record that Lessingia was ever there. But the same off-leash dogs, if displaced to Lake Merced, will have no adverse impacts on Lessingia even though Lessingia definitely grew at Lake Merced historically, and likely grew specifically in the off-leash area at Lake Merced (on "The Mesa"). (USFWS 2003, p25-27, Figure 1 p 5)

Corr. ID: 4650

Organization: *Not Specified*

Comment ID: 227748 **Organization Type:** Unaffiliated Individual

Representative Quote: There is no evidence other than speculation that the Park Service that dogs would prevent the establishment of this plant at these locations with the "no action" alternative. However, these plants do not exist in the park currently, and there is no evidence they ever existed in the park or that the Park Service would ever be successful in propagating these plants from Monterey County to these non-native locations in San Mateo County. It is disingenuous to include this plant in the DEIS at all since it is not native to the area, and it should be removed from both the Mori Point and the Pedro Point impact statements.

Corr. ID: 4670

Organization: Fort Funston Dog Walkers

Comment ID: 264297 **Organization Type:** Non-Governmental

Representative Quote: The DEIS is incorrect in stating that Alternative A

would possibly result in continued long-term impacts to the San Francisco Lessingia (which does not actually exist at Fort Funston in any case).

measure what is actually occurring under this management plan.

Response:

See response to Concern ID: 30391 regarding dogs as a contributing factor to impacts associated with wildlife [and listed species] and how potential impacts to listed species were described using LE data (leash law violations and warnings, citations, and pet waste removal violations) in combination with "best professional judgment of park staff, experts in the field, recovery plans and actions for listed species, ongoing data collection for other projects, and other supporting literature."

Chapter 4 provides an updated summary of the literature review that was conducted to document associations between dogs and special-status species. The information has been used to supplement other information in the impacts analysis.

Mission blue butterfly host plants (lupine species) could be affected by both on- and off-leash dog walking due to the plants' presence in and adjacent to the trail beds as detailed in Response 30391.

Although the San Francisco lessingia does not currently occur at Fort Funston, the plant historically occurred at this GGNRA site. Due to the historic presence of this plant at Fort Funston, some areas have been designated as San Francisco lessingia recovery and enhancement sites by USFWS (USFWS 2003, 128, 141). The recovery strategy for San Francisco lessingia is based on not only protecting and expanding the existing populations but also the "active reintroduction and expansion of San Francisco lessingia in unoccupied, restored or enhanced habitat within its historic range" (USFWS 2003, 51). Although the plant does not currently exist at Fort Funston, the unrestricted dog use at the site precludes the reintroduction of this species in USFWS-designated areas by NPS (Fritzke 2009, 1). Because this plant species cannot be reintroduced in an area designated as a recovery area for this species by USFWS, adverse impacts are described in the Special-Status Species section of chapter 4 under some alternatives.

The special-status species section in the draft plan/SEIS considers not only mapped occurrences of listed plant species, but suitable habitat that could support listed plant species, such as Hickman's potentilla. There are several known occurrences of Hickman's potentilla at Rancho Corral de Tierra. This plant is therefore evaluated in detail at the Rancho Corral de Tierra GGNRA site.

Concern ID:
CONCERN
STATEMENT:

30414

Commenters have observed or believe that dogs generally impact listed species at GGRNA, and some commenters stated that they do not think seasonal closures adequately protect listed species at GGNRA.

Representative Quote(s): **Corr. ID:** 1819 **Organization:** *Not Specified*
Comment ID: 191912 **Organization Type:** Unaffiliated Individual
Representative Quote: We also know that we have many highly-sensitive endangered plants and animals within Golden Gate National Recreation Area that are having a very hard time surviving given the chasing, running, and digging that occurs in areas where these species. There is such a huge population of dogs now that their impact is significant, which is why it's time to address their negative impacts.

Corr. ID: 2850 **Organization:** *Not Specified*
Comment ID: 202613 **Organization Type:** Unaffiliated Individual
Representative Quote: I am concerned about the continuing negative impacts of allowing dogs full access to the entire area without designated no-dog areas and an enforced leash law. In the GGNRA we have already lost one species on the endangered species list, with other species threatened by dogs. Dogs are not a natural predator in the area, but rather a man-made one

Corr. ID: 3438 **Organization:** *Not Specified*
Comment ID: 203240 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternative D best reflects the national park values. I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. The park is home to more endangered and threatened species than any other park in the continental U.S. More than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined! Protect these species and other protected wildlife from inappropriate activities such as motor vehicle use on beaches. The park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. Unleashed dogs represent the most significant recreational threat to wintering western snowy plovers

Corr. ID: 3852 **Organization:** *Not Specified*
Comment ID: 209320 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly discourage GGNRA from implementing any seasonal closures to protect nesting wildlife; to adequately protect wildlife, current and potential nesting areas should be off-limits to dogs year-round. Seasonal closures are largely ineffective, even with the best of signage and education campaigns. By permitting off-leash dogs in, as an example, snowy plover habitat during any portion of the year, the park will reduce compliance with regulations when the plover is present, as many people will not realize that the closure is seasonal. I frequently visit the beaches of Point Reyes National Seashore where there are seasonal closures for beaches upon which snowy plovers nest and elephant seals haul-out. I have lost track of the number of times I have encountered people with dogs--usually with the dog off-leash--in areas closed to dogs, and when I inform the owner that pets are not permitted there, the response is often to the effect of "but the beach was open to dogs a few months ago."

Response:

Time of use restrictions, including seasonal restrictions, can be difficult to enforce and are not a preferred management method. While this management concept will remain an option for dog management in the future, seasonal closures or restrictions are not used in the preferred alternative at any of the GGNRA sites.

The SPPA at Ocean Beach and the Crissy Field WPA will change from allowing off-leash and on-leash dogs seasonally to not allowing dogs at all to protect the snowy plover and other shorebirds, and dogs will no longer be allowed on the beach at Fort Funston north of the Beach Access Trail to protect the shorebirds and bank swallows. The bank swallow seasonal closure of a section of the beach at Fort Funston on the north end of the Fort Funston beach is a closure to all visitors, and in any case, is, in the preferred alternative, in an area not open to dog walking.

Concern ID:

30415

CONCERN STATEMENT:

Commenters do not agree with how the existing conditions (affected environment) and how dogs affect listed species have been described in the DEIS.

Representative Quote(s):

Corr. ID: 3213

Organization: *Not Specified*

Comment ID: 202533 **Organization Type:** Unaffiliated Individual

Representative Quote: I recreate daily with my dog on POST (soon to be GGNRA) land here in Montara. By my informal count, somewhere between 7 to 8 out of ten people recreating on this land are with dogs. If you ban dogs from this area, I wonder who will be recreating here? I and many others have been using this area for 30 years to walk with our dogs. In all that time I have seen no evidence where our dogs damaged the land. I do not see anywhere in your 2,000 plus page study any indication that dogs have damaged these lands. With regard to wildlife, I have never seen a dog catch a garter snake or a frog. We do not have snowy plovers on this land. There are plenty of coyotes here. Certainly they are a much greater threat to wildlife than our well fed domesticated dogs. They certainly make their own unsanctioned trails. By your reasoning, must they be removed?

Corr. ID: 3945

Organization: *Not Specified*

Comment ID: 227438 **Organization Type:** Unaffiliated Individual

Representative Quote: 1) The DEIS claims that dog have accessed the bluff above where Bank Swallows nest in sheer cliff faces near top; pet rescues have occurred over cliff, which may disturb the colony during breeding season when personnel repel down. There is no evidence of dogs and or humans digging at or collapsing the burrows, flushing birds from nests, and causing active sloughing and landslides that may block or crush burrows with the young inside. Dogs cannot reach birds from bluff; cliff rescues are rare no documentation that dogs or humans contribute to any other factors that may affect birds

2) The DEIS claims dogs could damage Mission Blue Butterfly habitat in the trail beds and adjacent to the trails/roads; protective fencing for habitat does not exclude noncompliant dogs. However, there are no known studies measuring the impact of dogs on the habitat. The rangers did not document

any cases of dogs in or damaging the restoration areas

3) The DEIS claims dogs could gain access to closed lagoon for the Tidewater goby (fish), dogs along the shoreline could crush goby burrows, cause increased turbidity. While individuals would be affected neither the population and gene pool would not be affected, and there are no known studies measuring the impact of dogs on the habitat. The ranger narratives only documented one case with two dogs briefly swimming in the Rodeo Lagoon during 2007 and 2008.

4) The DEIS claims dogs can cause California red-legged frog (amphibian) eggs, juveniles, and adult life stages to be affected by trampling and suffocation by sediments coating the eggs and behavioral disturbance or causing injury or mortality to individuals. There are no known studies measuring the impact of dogs on the habitat.

Corr. ID: 4089

Organization: Crissy Field Dog Group

Comment ID: 208365

Organization Type: Unaffiliated Individual

Representative Quote: The Draft Plan/DEIS does not address site-specific resources and the condition/health of those resources. This lack of information results in a vague baseline against which to assess the magnitude of impacts associated with implementing the proposed action and alternatives. With such a vague baseline, it's also difficult to assess the need to change existing dog management strategies.

Select examples:

- a. The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but no data are provided as to where/if they are actually present.
- b. While some special-status species descriptions suggest a nexus between dog activity and the species and/or their habitat (tidewater goby, California red-legged frog), other species descriptions do not (San Francisco garter snake, Coho salmon), and there is a consistent lack of detail describing the existing interaction, if any, between the species and dog activity.
- c. There are inconsistencies regarding the presence of species in the text and in Table 8 in the Special-Status Species affected environment, the information in Appendix H, and the impact analyses in Chapter 4.
- d. In Table 8 on page 246, the GGNRA Location column contains the location for plants that do not exist there according to the text.
- e. For a number of the analyses of Alternatives B-E, the Draft Plan/DEIS states that the area of impact is currently undisturbed. This is not the case, as dogs and humans are currently allowed in those areas.
- f. Additional examples are provided in Appendix D, "Soils and Geology," Appendix E, "Water Quality," and Appendix F, "Biology."

Response:

See response to Concern ID: 30391 regarding dogs as a contributing factor to impacts associated with wildlife [and listed species] and how potential impacts to listed species were described using LE data (leash law violations and warnings, citations, and pet waste removal violations) in combination with "best professional judgment of park staff, experts in the field, recovery plans and actions for listed species, ongoing data collection for other projects, and other supporting literature."

With the exception of western snowy plover monitoring, no site-specific, peer-reviewed studies have been conducted at the GGNRA sites for the sole purpose of documenting impacts to special-status species as a result of dogs. During the past six years, park staff has collected available scientific and technical information on dog management-related topics. Types of information collected include dog management policies from other jurisdictions, shorebird data from scientists and organizations that monitor San Francisco Bay Area shorebird populations, and other topics including dog interactions with wildlife, diseases, and waste issues.

Because there were not site-specific peer-reviewed studies for many resources in GGNRA, a literature review was conducted for the SEIS to provide scientific and peer-reviewed papers on impacts of dogs to vegetation, soils, and wildlife. Impact levels were adjusted accordingly based on the findings of the literature review. Sources used in the analysis of impacts from the literature review were scientifically rigorous and peer-reviewed. chapter 4 includes a general summary of the literature review conducted to document associations between dogs and special-status species.

Concern ID:
CONCERN
STATEMENT:

30417

Commenters have requested that off-leash dog recreation be prohibited or limited to enclosed areas, or that leashes should be required to protect listed species at GGNRA.

Representative Quote(s): **Corr. ID:** 426

Organization: *Not Specified*

Comment ID: 181612 **Organization Type:** Unaffiliated Individual

Representative Quote: So here are some suggestions and possible alternatives that have been brought up by other pro-dog people over the past few years:

1 Why not let the dog walkers, dog owners and pro dog people police themselves? By allowing people a permit, they are granted access to the GGNRA and the opportunity to run their dogs off leash?

2 Professional dog organizations and advocates are capable of organizing and CHARGING both business and individuals to use the land to exercise their dogs at. It is a luxury, and people get so much enjoyment from the GGNRA. And I am positive people will be more than happy to pay to be able to continue to use the land.

3 This will increase annual revenue for the GGNRA, and also allow responsible dog owners continued access to use the park. If people do not pay, or their dogs are unruly, aggressive or the owners are uncooperative with the standard policies, they lose their privilege of using the park.

4 If given permission from the GGNRA, why not allow pro-dog people the opportunity to fence off and dog proof restricted and sensitive habitat areas to reduce further eco- wildlife problems in the park? The park has limited and unsuccessful barriers now that people do not know where are the restricted areas and they do not keep dogs out of those areas.

Corr. ID: 2254

Organization: Napa Solano Audubon Society

Comment ID: 201012 **Organization Type:** Conservation/Preservation

Representative Quote: In general we agree with the National Park Service Preferred Alternatives, but we feel that there should be NO area in the

National Park that dogs should be allowed to go off leash to protect wildlife, people, and the dogs themselves. We are sorry to take such a tough stance on this, but wildlife, especially those rare and endangered species 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

Corr. ID: 2715 **Organization:** Wildlife Center of Silicon Valley
Comment ID: 195566 **Organization Type:** Unaffiliated Individual
Representative Quote: As a frequent visitor to the Golden Gate National Recreation area I am very concerned about impacts to wildlife from human activity and from dogs. The park's mission is to protect natural resources of the park, not allow recreation to undermine them.

Specifically, I am writing to urge that unregulated off-leash dog recreation be banned on more beaches and trails in the park, in order to protect species like the western snowy plover. Since the park is home to more endangered and threatened species than any other park in the continental U.S. I would like to see wildlife habitat receive a higher level of protection from human disturbance. The compliance rate should be 95%, not 75% as outlined.

Corr. ID: 3291 **Organization:** *Not Specified*
Comment ID: 202842 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly support protecting our endangered species in the Golden Gate Recreational area, including requiring dogs to be kept on leash. Dogs can be a menace not only to wildlife, but to other dogs and to people, and most dog owners do not have their dog under voice control. It is more appropriate to designate a space for people and their dogs to play together where they don't threaten wildlife and can be avoided by people with a fear of dogs.

I urge you to take all steps necessary to preserve our wildlife. Once gone, they can never be recovered, a permanent loss to all of humanity.

Corr. ID: 3314 **Organization:** *Not Specified*
Comment ID: 202920 **Organization Type:** Unaffiliated Individual
Representative Quote: There is no reason to risk the habitat of snowy plovers to off-leash domestic pets, when there are many locations that would not impinge on snowy plover nesting habitat. The Park Service should limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Response:

In this draft plan/SEIS, ROLAs have been proposed only in certain areas to specifically avoid impacting listed species, their habitat and potential habitat at GGNRA. In the few cases where there are sensitive areas near a ROLA, fences either already exist, or are proposed, to protect listed species and their habitat such as at Crissy Field's Central Beach or at Muir Beach, or a buffer zone that provides a division between areas, such as on Ocean Beach.

One of the main objectives stated in the draft plan/SEIS is to 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 walking, including harassment or disturbance by dogs. The preferred alternative in the draft plan/SEIS limits dog walking access in GGNRA to less than that under existing conditions, including allowing fewer off-leash areas. Where off leash areas are proposed, the specific, enforceable ROLA guidelines require control of dogs that are not on leash.

Concern ID: 30418

CONCERN STATEMENT: A commenter has noted that dogs can impact salmonid and frog species in the Big Lagoon and Redwood Creek.

Representative Quote(s): **Corr. ID:** 666 **Organization:** *Not Specified*
Comment ID: 181557 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs are off leash where they shouldn't be. They are in the Big Lagoon often, Redwood Creek and the riparian zone where they can impact salmonid and frog species recovery. Dogs run after shorebirds, which are disappearing at an alarming rate. Though I have observed all regulations, cleaned up after my dog, (he doesn't chase anything) and kept him leashed in restricted areas, I cannot condone the further permitting of dogs on Muir Beach. It has gotten too impacting. However if dogs continue to be allowed at these beaches, the responsibility lies on Park Service to provide better education and clarity about where and why dogs are restricted.

Response: As stated in the draft plan/SEIS, the park has closed the lagoon and Redwood Creek to visitors, although it has been observed that these closures have been violated and dogs have accessed Redwood Creek. Three incidents were recorded for dogs in a closed area in 2007/2008. New fencing will be added along the beach side of lower Redwood Creek and the lagoon to discourage visitors and dogs from accessing the water, but will not physically exclude dogs or visitors from this area. Impacts to listed salmonids as a result of the violation of these closures by dogs have been described in the draft plan/SEIS at the Muir Beach site.

Concern ID: 31393

CONCERN STATEMENT: Commenters noted that the report did not account for historic species range of the western snowy plover in the Presidio, and did not include scientific studies indicating this portion of the species area. Commenters also provided references of nesting by the plover in San Francisco.

Representative Quote(s): **Corr. ID:** 3149 **Organization:** *Not Specified*
Comment ID: 203977 **Organization Type:** Unaffiliated Individual
Representative Quote: Snowy Plovers -

Nesting records. The DEIS states that there is no record of nesting (p.1240). However, there are records of bird and egg specimens collected during nesting season. Grinnell, 1932, identifies the Presidio as the type locality for the Snowy Plover with a collection date of May 8, 1854, a date that falls within the known nesting season for the species. Also, Smithsonian Institution collection data documents an egg specimen from San Francisco. See <http://collections.nmnh.si.edu/search/birds/>

Potential nesting site. The DEIS fails to acknowledge that the USFWS

Snowy Plover Recovery Plan has identified Crissy Field as a potential expansion site for snowy plovers; see USFWS Recovery Plan pp. 43/44.

Natural & Cultural Nexus. The Presidio of San Francisco is the type locality for the Snowy Plover, collected by Lt. William Trowbridge (Army Corps of Engineers, U.S. Coastal Survey), on May 8, 1854 (Grinnell, 1932). Trowbridge is also responsible for construction of the Golden Gate Tidal Gauge, which began operation in June of 1854 (Nolte, 2004). Given the location of the tidal gauge, it is quite possible that the type specimen was collected from what is now the Crissy WPA.

Corr. ID: 3606 **Organization:** Golden Gate Audubon
Comment ID: 203951 **Organization Type:** Unaffiliated Individual
Representative Quote: Factually erroneous statements in the report about the historical and current status of the Western Snowy Plover are particularly egregious. Snowy Plovers formerly nested in The Presidio and in fact The Presidio is the Type Locality of the Snowy Plover (Trowbridge, May 8, 1854). Omission of sighting vetted scientific studies regarding the impact of dogs on natural and cultural resources has led to misinformation and speculation of statements in the DEIS.

Response:

NPS obtained the following reference as suggested by commenters: Grinnell, Joseph. 1932. "Type localities of birds described from California." University of California Publications in Zoology, Vol. 38, No. 3:243-324. As a result of reviewing this document, information regarding the historical nesting of the western snowy plover at Crissy Field was added to the draft plan/SEIS in the Special-Status Species section of chapter 3. However, the "cultural significance" of this locality will not be included in the draft plan/SEIS because Golden Gate Audubon uses this term in a manner that is different than NPS.

TE4000 – THREATENED AND ENDANGERED SPECIES: IMPACT OF PROPOSAL AND ALTERNATIVES

Concern ID: 30382
CONCERN STATEMENT: Commenters support alternative A because they do not agree with the impacts analysis for listed species at GGNRA.

Representative Quote(s): **Corr. ID:** 3620 **Organization:** *Not Specified*
Comment ID: 204083 **Organization Type:** Unaffiliated Individual
Representative Quote: Principal Reasons for Favoring Alternative A 2. Absence of Critical Habitat Protection. At the open house held at Fort Mason, one of the senior rangers confirmed that there were few, if any endangered flora at Fort Funston because of decades of urban and natural degradation beginning with the area's use as a military complex. I have also not seen anything in the NPS Report that suggests otherwise, other than declaratory general statements that there would be some adverse impacts. Yet, the NPS's preferred solution would close the entire area to off-leash dog walking.

As for fauna, where bank swallows or other birds nest on a seasonal basis, the NPS has a reasonable solution that adequately balances competing interests by simply closing those affected areas on a temporary basis to off-leash dogs or, if necessary, to any dog-walking activity.

3. Closure will simply lead to concentrated degradation in areas that remain open. The extremely limited opportunities for dog-walking in non-urban outdoor spaces in San Francisco will guarantee Fort Funston's continued use as a dog-walking area by area locals, regardless of which management plan is adopted. The NPS's preferred plan, in which off-leash dog-walking areas are restricted to the beach and to one area adjacent to the parking lot, will simply concentrate that usage to a much smaller area, thus magnifying both environmental impacts - to the extent that there are any - and the likelihood of conflict between dogs and people.

4. Closure violates one of the four outstanding values to be protected by the GGNRA in the 1972 enabling legislation. It is important to recall that the GGNRA, including Fort Funston, was originally intended as an urban recreation area. It should not be viewed in the same category as other non-urban National Parks covered by the NPS. As an urban outdoor recreation area, it fulfills an important function in allowing urban dogs and their urban human owners a rare opportunity to get out and stretch their respective legs. That function should not be jeopardized or restricted, absent compelling reasons to do so - reasons which the NPS has not shown with regard to Fort Funston.

Response: Comment noted

Concern ID: 30383
CONCERN STATEMENT: Commenters support the preferred alternative because it would protect listed species at GGNRA.

Representative Quote(s): **Corr. ID:** 2013 **Organization:** *Not Specified*
Comment ID: 200524 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly support the national Park Service's dog management plan for the Golden Gate National Recreation Area. Protecting the Snowy Plover and other fragile natural resources should be the top priority of the plan. There are already existing plenty of options for dog owners who want their dogs to be able to go off leash. And owners who want to bring their dogs to the National Recreation Area can live within the leash rules proposed in the new plan. I hope you will stick to your guns. This is a good plan which will preserve the great and fragile natural beauty of the coast for everyone. I strongly support the plan.

Corr. ID: 2807 **Organization:** USFWS Sacramento Office
Comment ID: 201103 **Organization Type:** Federal Government
Representative Quote: 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

Corr. ID: 3568 **Organization:** *Not Specified*
Comment ID: 203535 **Organization Type:** Unaffiliated Individual
Representative Quote: I have a dog and strongly support the GGNRA Draft Dog Management Plan. It strikes the right balance between protecting the many endangered species in San Francisco's Presidio while at the same time it offers unusually liberal use by canines and their guardians/walkers.

Response: Comments noted

Concern ID: 30384
CONCERN STATEMENT: [Alternative D is supported because it provides the most protection for listed species \(including the SF lessingia at Fort Funston; the snowy plover at Ocean Beach; the snowy plover at Crissy Field; the MBB at Oakwood Valley/Alta Ave.\); some commenters also believe that the compliance rates should be higher than 75%.](#)

Representative Quote(s): **Corr. ID:** 3322 **Organization:** *Not Specified*
Comment ID: 202926 **Organization Type:** Unaffiliated Individual
Representative Quote: Given its mission to protect natural and cultural resources, the National Park Service has an even more compelling reason to protect the habitat of listed species. For that reason, I feel strongly that Alternative D is the right choice for park to adopt as its Dog Management Plan.

I have a dog, and I would love to be able to take her on the beach near my home. But if I walk an extra mile south I can take her to a beach without habitat for listed species. The GGNRA is just a few miles north of here, and I am sure that many residents and visitors experience the same tradeoff. But they have a choice; the western snowy plovers do not.

Corr. ID: 3468 **Organization:** Nation Parks Conservation Association
Comment ID: 203300 **Organization Type:** Unaffiliated Individual
Representative Quote: I urge you to accept Alternative D as it reflects the best solution to provide and protect the future habitat destruction of the Bay. Requiring all off-leash areas to be enclosed protects endangered wildlife that is just beginning to return after much public money has been spent to restore this area. The will of the people is clear. It is imperative you vote to protect and restore this valuable resource for future generations to come.

Corr. ID: 3839 **Organization:** Endangered Habitats League
Comment ID: 203766 **Organization Type:** Unaffiliated Individual
Representative Quote: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best

reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as proposed.

Please require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Response:

Comments noted. See response to Concern ID 29652 for an explanation of the new monitoring-based management strategy that addresses why the percentage trigger has been removed.

Concern ID:

30385

CONCERN STATEMENT:

It has been suggested that the draft plan/EIS does not provide an alternative that will adequately protect listed species (such as the snowy plover) and/or do not agree with the seasonal restrictions; dogs should be leashed year-round in snowy plover protection areas to avoid confusion that leads to non-compliance.

Representative Quote(s):

Corr. ID: 1902

Organization: San Francisco State University

Comment ID: 200433 **Organization Type:** Unaffiliated Individual

Representative Quote: I would like to see the requirement that dogs must be on leash all 12 months of the year in the Snowy Plover Protection Areas. This will avoid the current confusion. I have talked to many people who were confused as to what time of year there was a leash requirement on Ocean Beach and who did not leash their dogs because of the confusion. The leash requirements must also be enforced, as they are not currently enforced in any adequate manner.

Corr. ID: 2813

Organization: *Not Specified*

Comment ID: 201117 **Organization Type:** Unaffiliated Individual

Representative Quote: Why forbid dogs on the West Beach when the Snowy Plovers are not there for almost half the year! Last year the six Snowy Plovers on the West Beach departed in March and did not return until November. I am perfectly happy, as are most dog owners, to protect the birds WHEN THEY ARE THERE. I look forward to their return each winter. The post and cable fence at the beginning of the Wildlife Protection area is a true success. Ticket the dogs and their owners and other users who plant themselves in the middle of the plover area.

Prohibit dogs on the West Beach when the Snowy Plovers are actually there, then allow dogs the rest of the time. This beach is completely underused during the plover off-season and would provide an outlet for the overcrowding on the Central Beach. Also, at the Wildlife Protection area another sign should be placed on the last post before the Bay so that everyone can be alerted to the restrictions at low tide.

Corr. ID: 3852

Organization: *Not Specified*

Comment ID: 209322 **Organization Type:** Unaffiliated Individual

Representative Quote: The DMP would also preclude the possibility of the snowy plover or other shore birds from ever adopting many coastal areas of

GGNRA as nesting areas. According to the background information printed in the Federal Register during a previous comment period pertaining to dogs on Ocean Beach and Crissy Field, "snowy plovers do not nest in the park; they overwinter from approximately July through April. During the overwintering period, Snowy Plovers rest and feed to gather reserves necessary to successfully breed at other more suitable nesting locations up and down the Pacific coast." Given that snowy plovers nest on the beaches of Point Reyes, I would assume that snowy plovers used to nest on the beaches of the San Francisco peninsula, beaches which are now part of GGNRA.

And allowing pets in these areas when snowy plovers would otherwise be nesting there will assuredly prevent the plovers from ever selecting Crissy Field and Ocean Beach as a nesting site. And given how few suitable nesting sites are left for the snowy plover, it is incumbent upon the National Park Service-which is mandated to protect the wildlife unimpaired-to do everything it can to preserve whatever habitat there is for the plover to thrive.

Corr. ID: 4695 **Organization:** Golden Gate Audubon Society
Comment ID: 264334 **Organization Type:** Conservation/Preservation
Representative Quote: The DEIS Does Not Adequately Explain How or Why the Park Service is Allowing the Continued "Take" of Endangered Species and Other Protected Species by Dog Owners without Permits.

The DEIS acknowledges that harassment of snowy plovers by people or their dogs constitutes a violation of the federal Endangered Species Act, 16 U.S.C. §§ 1361 et seq. (See DEIS at 1240 ("Chasing of plovers clearly meets the definition of harassment and take under the ESA of 1973"))

Response:

In the draft plan/SEIS, areas closed to dogs have been specifically described for certain sensitive areas to protect listed species and their habitat. For example, in the preferred alternative, the SPPA at Ocean Beach and the WPA at Crissy Field will change from allowing off-leash and on-leash dog walking seasonally to not allowing dogs at all to protect the snowy plover and other shorebirds. Seasonal/time of use restrictions have created confusion for the public and are difficult for the Park to enforce. This management concept will remain an option for dog management in the future, but seasonal/time of use restrictions for dog walkers are not included in any of the alternatives, including the preferred alternative. In addition, dogs will be required to be on leash at Muir Beach instead of off leash as currently allowed, and many trails in undeveloped areas throughout the park would be closed to dog walking, including off-leash dog walking, since there is a higher likelihood of impacts to adjacent resources, including listed species.

Concern ID:
CONCERN
STATEMENT:

30386
It has been suggested that the proposed draft plan/EIS does not establish reasoning for the benefits to listed species as a result of stricter dog management. In general, some commenters do not agree with the impacts

analysis of listed species (snowy plover, bank swallow) at GGNRA as a result of dogs in the draft plan/EIS because there is no scientific evidence connecting dog-related activities with the stated impacts. Most visitors with and without dogs are respectful of listed species.

Representative Quote(s): **Corr. ID:** 3786 **Organization:** Cayuga Improvement Association

Comment ID: 205541 **Organization Type:** Unaffiliated Individual

Representative Quote: There are plenty of things to disturb wildlife in a park in the middle of a city. For example when I have gone down to the beach below Fort Funston the dogs are generally playing in the water. Not climbing up the cliffs disturbing the bank swallows. However I do see kids climbing up the cliffs. After the 4th of July I have seen evidence of people shooting off bottle rockets below the cliffs. There are many Crows out at Fort Funston and we all know they like to scavenge other birds' nests. At Lake Merced across from Fort Funston where some of the swallows feed there are two very loud shooting ranges. So how can the Park Service say that removing dogs is going to protect the Bank Swallow?

Corr. ID: 4089 **Organization:** Crissy Field Dog Group

Comment ID: 208387 **Organization Type:** Unaffiliated Individual

Representative Quote: The Draft Plan/DEIS doesn't establish how or why a special-status species that has been sharing habitat with dogs for decades will experience an actual, likely benefit from stricter dog management, given other factors affecting the species.

Corr. ID: 4520 **Organization:** *Not Specified*

Comment ID: 209585 **Organization Type:** Unaffiliated Individual

Representative Quote: The Environmental Consequences (Section on Special-status Species) in Chapter 4 is inadequate because it fails to provide adequate scientific evidence connecting dog-related activities with impacts on snowy plover populations or other wildlife populations. Are documented snowy plover populations nesting or resting, and no site-specific scientific evidence is given to the impact of canine interactions? I applaud and support protection of endangered species. But, are interaction impacts between dogs and the endangered actually more or less significant than other activities in the GGNRA. No comparative evidence or analysis of varied activities is addressed.

Corr. ID: 4592 **Organization:** *Not Specified*

Comment ID: 209989 **Organization Type:** Unaffiliated Individual

Representative Quote: Incident reports indicate that dogs and dog owners are generally very well behaved. The percentage of incidents involving dogs is very small considering the number of dogs in the park.

111 Off-leash recreation is being held to a higher standard when measuring "effect on wildlife." The DEIS indicates that protection of wildlife is a rationale for restrictions on off-leash recreation. Note that there is no scientific data indicating that dogs per se have caused harm to the snowy plovers, bank swallows, or other wildlife. This is in spite of the park and others who have been diligently LOOKING for evidence of damage, and in spite of the fact that wildlife and off-leash dogs have successfully co-existed for over three decades in the GGNRA. The turn of a plover's head, a

movement or lack of movement (!), is considered by the GGNRA to be an "effect." In other national parks, when judging the appropriateness of a recreation, e.g. hunting, an effect is measured by whether the recreation affects the POPULATION count.

Corr. ID: 4630

Organization: *Not Specified*

Comment ID: 208655 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS is highly biased and blames dogs for problems that are either caused by general park use or overall natural trends. For example, there is no hard evidence offered that dogs create a singular burden on the park resources and habitats. The 36 threatened and endangered species that exist within the park system are not endangered by conditions here, specifically by dogs in the GGNRA as the report would have you believe, but rather by their population numbers worldwide. In fact, the small number of sites currently open to recreation with dogs (as defined by the 1979 Pet Policy) include no critical habitats or nesting areas for either the Snowy Plover or bank swallow.

Corr. ID: 4705

Organization: *Not Specified*

Comment ID: 209741 **Organization Type:** Unaffiliated Individual

Representative Quote: The document you have prepared is not based on facts about dogs' impact on the environment and the survival of endangered species. There is no scientific data to illustrate your conclusions in your report. Humans, pollution, and other factors contribute to certain species being endangered.

Response:

As stated in the response to Concern ID 30405, the GGNRA enabling legislation does include the preservation of natural resources, which includes the protection of listed species. The NPS Management Policies 2006 (NPS 2006b, 45) provide guidance to the NPS for the management of threatened and endangered species. Section 4.4.2.3 states, "The Service will survey for, protect, and strive to recover all species native to national park system units that are listed under the Endangered Species Act. The Service will fully meet its obligations under the NPS Organic Act and the Endangered Species Act to both proactively conserve listed species and prevent detrimental effects on these species." This reasoning is stated in the draft plan/SEIS that NPS is obligated to protect listed species through the park's enabling legislation as well as the Federal acts described above. A beneficial impact has been described in this draft plan/SEIS as a positive change from the current conditions or appearance of the resource and is a relative indicator of progress compared to the no-action alternative. So, benefits to listed species could include reducing, avoiding, or minimizing harm that is currently occurring to the actual listed species or potential habitat.

Concern ID:

***CONCERN
STATEMENT:***

30391

While some commenters noted that it has been observed that dogs adversely affect vegetation in MBB habitat, others commenters stated that dog recreation was not having an impact on the mission blue butterfly or did not agree with the impacts analysis.

Representative Quote(s): **Corr. ID:** 779 **Organization:** National Audubon Society
Comment ID: 185708 **Organization Type:** Unaffiliated Individual
Representative Quote: Dog policy within GGNRA is in critical need of revision, and enforcement.

Inevitable small percentage of scofflaw dog owners (majority obey rules) has resulted in:

--Reduction in diversity of birds and other animals seen by naturalists. For example, see Peter Banks; *Biology Letters*, Dec, 22, 2007 3(6) 611-613, documenting up to 40% measured reduction in birds along trails used by dogs.

--On daily nature walks, I have personally noted a reduction in threatened, endangered, and special status species within Marin Headlands, and Oakwood valley trails. Species of concern are ground dwelling birds (California Quail, California Towhee, Fox Sparrow, Swamp Sparrow, Virginia Rail, as well as species requiring secluded habitat and specialized cover, such as Long-eared Owl and Rufous-Crowned sparrow.

--Along upper reaches of Alta trail professional dog walkers are seriously disturbing habitat of Mission Blue Butterfly by allowing dogs to roam freely.

Corr. ID: 3852 **Organization:** *Not Specified*

Comment ID: 209323 **Organization Type:** Unaffiliated Individual

Representative Quote: Too many times I have witnessed off-leash dogs in NPS areas chasing after and harassing birds and other wildlife. A friend has related to me how, on a weekly basis, she witnesses a professional dog walker release up to 6 dogs to run and chase each other and wildlife in Oakwood Valley, trampling and tearing up the host plant to the endangered Mission Blue Butterfly. I've heard other friends describe witnessing off-leash dogs in national parks attacking or harassing pinnipeds and chasing after shorebirds, including the threatened snowy plover.

Corr. ID: 4465 **Organization:** *Not Specified*

Comment ID: 264254 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS incorrectly asserts that the presence of dogs disturbs the habitat of the mission blue butterfly, both its host plant the lupine, and the grasses. (p. 1123)

Corr. ID: 4640 **Organization:** *Not Specified*

Comment ID: 227735 **Organization Type:** Unaffiliated Individual

Representative Quote: Other than the Mission Blue Butterflies habitat near the Notch Trail entrance, which is miles from the other trails, there is no evidence that protected species even exist in this park. For the Mission Blue Butterfly, there is no reasonable correlation that dog recreation would have any more than negligible impact on the habitat, particularly since the habitats is fenced. I support adding voice-control trails and adding other solutions to improve dog recreation at Sweeney Ridge/Cattle Hill.

Response:

The draft plan/SEIS states that "It is important to note 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. The results of the literature review that has been conducted provide a general nexus for dog-related impacts to wildlife, listed species, and plants. The existing credible scientific literature is discussed in detail in the draft plan/SEIS as well as law enforcement data collected at the park. Under the U.S. Department of the Interior, law enforcement (LE) rangers or U.S. Park Police can submit a 'criminal incident record' for an incident including any charges that have been filed for visitors on park property. These records are referred to as incident reports and include violations of park regulations and/or applicable portions of 36 CFR (for example, vegetation damage or wildlife disturbance) that result in a citation, verbal warning, or a written warning by LE or U.S. Park Police. Dog-related incidents were compiled for GGNRA using the criminal incident reports written by both divisions. Therefore, law enforcement data as well as knowledge and direct observations from NPS staff at the sites were also used to determine impacts on wildlife and listed species.

Mission blue butterfly host plants (lupine species) could be affected by both on- and off-leash dog walking due to the plants' presence in and adjacent to the trail beds. Vegetation along trails is particularly vulnerable to damage (Cole 1978, 281). Sensitive environments can be subject to physical disturbance by dogs (through digging or bed-making) and could damage vegetation and soils, with resulting influences on vegetation, soils, and wildlife such as small mammal populations (Sime 1999, 8.9). "High foot traffic (both people and dogs) resulting from an off-leash area would result in trampling and disturbance of vegetation" (Andrusiak 2003, 5). Soils and vegetation can be affected by dogs through defecation and urination, although this has not specifically been documented in peer-reviewed studies. Trailheads are known as areas of disturbance by visitors and their activities as well as by 'marking' dogs. The lupine host plants grow in the trail beds and directly adjacent to the trail in some locations as well as off trail at GGNRA (NPS 2009b). The permanent loss of individuals of the species could occur if mission blue butterfly eggs or larvae are present on vegetation along a trail/road that is disturbed by dogs. Potential adverse impacts from dogs include trampling host plants, dislodging eggs from host plants, crushing larvae, adding nutrients to soils from dog waste, and spreading invasive plants, all of which could affect the lupine host plants that support the mission blue butterfly.

Concern ID:
CONCERN
STATEMENT:

30393

Commenters do not agree that dogs disturb the bank swallows at Fort Funston. Some commenters believe that human disturbances and natural disturbances impact the bank swallow, and that signage and fencing can mitigate for potential impacts.

Representative Quote(s): **Corr. ID:** 1803 **Organization:** *Not Specified*
Comment ID: 191661 **Organization Type:** Unaffiliated Individual
Representative Quote: b) Severe restrictions are not needed to protect the bank swallow. The DEIS claims "continuing" impacts from dogs and/or humans that include digging at or collapsing the burrows of bank swallows, flushing the birds from nests, and causing active sloughing and landslides that may block or crush the burrows. However, there is no documentation that any of these impacts actually occur. Bank swallows burrow near the top (but not at the top) of sheer cliff faces at Fort Funston. There is no way dogs can access these burrows, so there can be no impact on them from the dogs

Corr. ID: 2103 **Organization:** *Not Specified*
Comment ID: 193356 **Organization Type:** Unaffiliated Individual
Representative Quote: The new rock revetment has displaced more bank swallows than ALL dogs running between Sloat & Fort Funston.

Corr. ID: 4153 **Organization:** *Not Specified*
Comment ID: 208654 **Organization Type:** Unaffiliated Individual
Representative Quote: I have never seen dogs at Ft Funston bother bank swallows. I have witnessed many times over many years bank swallows swooping in and flying behind dogs catching the insects they kick up when they are walking in open areas.

I have seen predation of bank swallows by the crows/ravens whose numbers seem to be ever increasing at Ft Funston.

Corr. ID: 4249 **Organization:** *Not Specified*
Comment ID: 209210 **Organization Type:** Unaffiliated Individual
Representative Quote: Additionally, this section is proposed as off limits to dogs because of the bank swallows, but there research by California's Department of Fish and Game that found that the bank swallow is remarkably indifferent to the activities of people near nesting sites. Bank swallows frequently nest near intense human activity, including busy highways, construction sites and quarries. There does not appear to be scientific evidence supporting the claim that people or dogs on the bluffs far above the nests or beneath the flyover zone would hurt the birds.

Corr. ID: 4396 **Organization:** *Not Specified*
Comment ID: 209569 **Organization Type:** Unaffiliated Individual
Representative Quote: One large assumption is that both the environment and the endangered species "could be" threatened by our dogs. These parks are not designated as critical habitat. The Snowy Plover doesn't nest or breed at Fort Funston or Ocean Beach. The endangered Bank Swallow burrows near the top of the cliffs at Fort Funston where no dogs can possibly go. These birds are probably more upset with the paragliders that are not being forced out of the GGRNA. As with most of the wildlife that can tolerate our busy urban spaces, it is the bicycles and the surfers and the people that are strange and frightening; not the dogs which appear quite like normal predators to them. (Just another coyote).

Corr. ID: 4622 **Organization:** *Not Specified*
Comment ID: 207072 **Organization Type:** Unaffiliated Individual
Representative Quote: Bank Swallows/Native Species/Habitat Protection -

The DEIS claims that off leash dogs are interfering with the nest of the Bank Swallows which are located on the cliffs at the beach. While every once in a while an errant dog falls over the cliffs by accident, this is unusual experience and not done to interfere with a bird. In fact, I have never seen a dog anywhere near the cliffs paying the least bit of attention to any bird. People climb the cliffs and also fall over them but the DEIS does not include any analysis of the effect of the human interference with Bank Swallows or other native inhabitants. In addition, no statistical data is provided pertaining to the large number of cliff rescues by the Police, Sheriff, Fire Department, Coast Guard. There must be data available because the various departments are frequently present on site practicing and / or rescuing.

The DEIS fails to address the effect of the large invasion of the non-native crows/ravens at Fort Funston on the native species of birds and animals. Look around. There is not a seagull to be found at Fort Funston. The seagulls were previously at the Fort. Now they are at Lake Merced. I doubt the hanggliders drove them off. I doubt the dogs drove them off. However, the crows/ravens have invaded the cliff areas, have driven off most all of the other birds and appear to eat everything and anything. They show no fear of dogs or humans. The DEIS fails to address the destructive effect these birds are having on the native birds and animals of Fort Funston.

Corr. ID: 4670 **Organization:** Fort Funston Dog Walkers
Comment ID: 264296 **Organization Type:** Non-Governmental
Representative Quote: The document contains numerous references to the possibility of a negative impact by dogs to bank swallows. There is no documentation that negative impacts have actually occurred and some of the possible impacts are physically impossible (unless dogs learn to scale vertical cliffs, it is unlikely a dog will ever disturb a bank swallow burrow).

Response: See response to concern 30391

Concern ID: 30400
CONCERN STATEMENT: [Some commenters have stated it is the park's mission to protect listed species at GGNRA and that a compliance rate of 75% is too low.](#)

Representative Quote(s): **Corr. ID:** 2678 **Organization:** *Not Specified*
Comment ID: 195491 **Organization Type:** Unaffiliated Individual
Representative Quote: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Response: As stated in the response to Concern ID 30405, the GGNRA enabling legislation requires preservation of natural resources, which includes the protection of listed species. Additionally, the NPS Management Policies

2006 (NPS 2006b, 45) provide guidance to the NPS for the management of threatened and endangered species and NPS must "fully meet its obligations under the NPS Organic Act and the Endangered Species Act to both proactively conserve listed species and prevent detrimental effects on these species."

Also, see response to Concern ID 29652 for an explanation of the new monitoring-based management strategy that addresses why the percentage trigger has been removed.

VR2010 – VEGETATION AND RIPARIAN AREAS: AFFECTED ENVIRONMENT

Concern ID: 29620
CONCERN STATEMENT:

Dogs are often seen impacting flora and riparian areas through digging, urinating and defecating, and trampling of plants in areas where dogs are not permitted. Dogs can negatively impact the growth of native plant species, particularly when they have been recently planted and are fragile.

Representative Quote(s): **Corr. ID:** 1246

Organization: *Not Specified*

Comment ID: 194930 **Organization Type:** Unaffiliated Individual
Representative Quote: Most owners are careful to clean up pet feces when they can, but not all is removed, and there's no cleaning up urine. In addition, some overestimate their voice control. Too often I've seen dogs rush around a newly-planted area digging holes, chasing mice, and relieving themselves, while the owner shouts the dog's name to no avail.

Corr. ID: 2058

Organization: *Not Specified*

Comment ID: 200513 **Organization Type:** Unaffiliated Individual
Representative Quote: As a volunteer, I help plant native plants in the park. Numerous times I have seen dogs disobey their owners while off-leash. For example: One day- a woman walking her dog off leash near our work site lost control of her dog. The dog ran into the sensitive planting area and began growling and barking at the volunteers. The woman was unable to capture her dog when she called for it. The dog ran away from her and then both she and the dog were trampling through the planting area. This wastes the National Park's money and time. And several of the volunteers were upset by the dog's erratic behavior.

Corr. ID: 2194

Organization: University of Louisville

Comment ID: 200689 **Organization Type:** Unaffiliated Individual
Representative Quote: I later witnessed other dogs rooting around, and defecating in one of the precious few areas that have undergone some native plant restoration work. Despite the presence of obvious signage illustrating the work that had taken place there, and several informative brochures noting just how rare of a micro-climate that portion of the S.F. peninsula provides, it almost seemed like the dogs were there specifically to undermine every attempt to give the part back to it's natural state

Corr. ID: 2209

Organization: Mattingly Landscape Co

Comment ID: 200729 **Organization Type:** Unaffiliated Individual
Representative Quote: All it takes to kill a small, delicate plant is the

urine, feces, or trampling of one dog. When that is multiplied by hundreds or thousands of visitors per week then it comes as some surprise to me that dogs are allowed in areas such as the Presidio at all

Corr. ID: 2262 **Organization:** *Not Specified*
Comment ID: 201028 **Organization Type:** Unaffiliated Individual
Representative Quote: I also think the negative impact of dogs to our environment is not limited to damage they may cause to the plants and animals living in the area but because of the vast amounts of waste they produce regardless of whether the owners pick it up or not.

Corr. ID: 4004 **Organization:** *Not Specified*
Comment ID: 206262 **Organization Type:** Unaffiliated Individual
Representative Quote: On the same hike we saw a dog tearing back and forth in this sandy area where it looked like native plants had been planted, or were at least struggling to establish themselves. If we want these areas to remain beautiful for many years to come, we need to allow the habitat restoration being done time to take hold, and when dogs are running completely free everywhere, it can really damage that progress in making, and keeping, our parks beautiful and great for all of us to enjoy.

Corr. ID: 4408 **Organization:** *Not Specified*
Comment ID: 206414 **Organization Type:** Unaffiliated Individual
Representative Quote: I remember when Fort Funston was covered in ice plant around the parking lot area. Ice plant is a very tough "bullet proof" plant. I have spent time pulling up this native in areas where the native habitat is being restored. This plant has literally been worn away by the presence of so many dogs. Dogs dig and dog urine burns grass and other plants, probably due to the high nitrogen content. Grass in SF parks is crisscrossed by numerous dogs, and dead grass can easily be seen in circular areas where repeated marking from the dogs has occurred. These areas continue to enlarge as more dogs urinate there. I think this is another reason to limit the dogs to fenced areas.

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 limits 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 ROLAs 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.

Concern ID:
CONCERN
STATEMENT:

29622
Impacts to vegetation and riparian areas are vastly overstated in the plan. The vegetation present at many sites in the GGNRA is non-native. Dogs are well-behaved and under the control of their owners, who respect fenced off areas and native plantings.

Representative Quote(s): **Corr. ID:** 1515 **Organization:** *Not Specified*
Comment ID: 190671 **Organization Type:** Unaffiliated Individual
Representative Quote: I have never witnessed any harmful encounters between dogs and wildlife, or plant life and instead or restricting space for dogs should issue fines for incidents allowing visitor/people to report. Having such fines would motivate people/dogowners to respect the habitat.

Corr. ID: 2936 **Organization:** *Not Specified*
Comment ID: 202231 **Organization Type:** Unaffiliated Individual
Representative Quote: This, however, begs the point that we users of the park are in conflict with the environment peculiarities of the environment (bird safety, care of the dunes, growth opportunities for specialized plants). To argue that we are in conflict is a false assumption, and to conclude that off-leash dog use (and the people to whom the dogs are attached) are a danger to the flora and fauna of the park is a conclusion that is ineluctably drawn from a false premise. We all guard the plant life, we clean up after our animals, we value the wild animal life (i.e. the birds); in the 5 years that I have walked, limped, or rolled on the path at Fort Funston, I have never observed a dog harming a bird. Someone posted a picture of a dog chasing an injured bird by the beach. That is a peculiar and one-time activity - an activity that neither I nor anyone I have ever asked has seen repeated. Please do not draw a false and harmful conclusion from a one-time, media seeking photo op provided by those who look for ways to cause the GGRNA to change its policy.

Corr. ID: 4145 **Organization:** *Not Specified*
Comment ID: 208620 **Organization Type:** Unaffiliated Individual
Representative Quote: As an avid environmentalist, I am very supportive of the work the GGNRA has done to curtail erosion and protect plant and wildlife in the parks. I make sure that neither I nor my dog goes into areas that have been fenced off and designated (with signage) for replanting or environmental protection. In my experience, all dog-owners I've come across in GGNRA areas have very effectively used voice control to keep their dogs off these areas.

Corr. ID: 4155 **Organization:** *Not Specified*
Comment ID: 208666 **Organization Type:** Unaffiliated Individual
Representative Quote: The original 1979 ruling in regards to off leash dog walking areas should be honored. The bad science in the DEIS doesn't prove that dogs off leash are bad. The plants are better than they have ever been, the wildlife is more abundant that it has ever been and there are more people enjoying the GGNRA. I walk my dog off leash at Crissy Field, Baker Beach and Ocean Beach. He is always under voice control and loves to chase his frisbee both in and out of the water. Both these activities would be impossible if he were on leash.

Corr. ID: 4465 **Organization:** *Not Specified*
Comment ID: 264261 **Organization Type:** Unaffiliated Individual
Representative Quote: In fact the DEIS provides no examples of vegetation specifically affected by dog activity. The DEIS should be changed to reflect No Effect from dogs on vegetation in the fenced in

dunes. The DEIS fails to account for the impact of children playing and trampling dunes.

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.

Concern ID:

29623

**CONCERN
STATEMENT:**

People and other natural factors have a much greater impact on vegetation and riparian areas than dogs. Families, events, non-native species, and the elements all impact vegetation in the parks, not just dogs.

Representative Quote(s): **Corr. ID:** 25

Organization: *Not Specified*

Comment ID: 209627 **Organization Type:** Unaffiliated Individual
Representative Quote: 2) The biggest problems to habitat are restricting usage of the park to trail or public use areas and dog feces. Park trail access is also a problem for humans. I recently saw a family in Muir Beach that didn't want to use the pedestrian bridge, saw a shortcut through the lagoon and trampled through the newly planted area that park staff and volunteers have so carefully planted. They didn't have a dog. Should we also ban humans from Muir Beach as well? If you value the habitat, that may be prudent. I see far more humans abusing habitat at the Muir Beach lagoon than people, including off-trail usage and littering. On the matter of dog fecal matter, why not require all people that are walking dogs to provide evidence of having poopie bags for removing litter? Anyone without a bag is obviously going to let their dog's fecal matter by the side of the trail and should be fined.

Corr. ID: 1043

Organization: individual - cannot uncheck "member"

Comment ID: 191840 **Organization Type:** Unaffiliated Individual
Representative Quote: For example, when visiting Muir Beach, I see children run amok in sensitive areas as dogs play in the surf or lounge with their families. Where is the signage to protect recently restored riparian areas and the mouth of the salmon stream? It is not being threatened by responsible dog owners, but by irresponsible or uneducated people.

Corr. ID: 3444

Organization: *Not Specified*

Comment ID: 203250 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs do not negatively impact the environment. It

is not the dogs that are stealing the nesting eggs from the birds, it is the crows and ravens! That is why there are fewer birds.

Mother Nature changes the landscape at Fort Funston on a daily basis. The wind, rain and wave water erosion cause the land to change dramatically. Everyday! So, it does not matter that the dogs run up and down the hills because they are always changing and will continue to do so, wether or not the dogs are there!

The dogs do not impact the ice plant - which is the natural plant that grows out there. What the heck? Ice Plant????

Dog walkers benefit working people in allowing them to have time to go to work and spend with their families rather than doing this chore.

Dogs benefit from daily runs on the beach because they are better behaved and less aggressive when at home.

Dog walkers, by their sheer presence, keep gangs and violence off the beach and out of parks.

Our urban parks will be saturated with dogs and there will be a negative impact financially and more serious dog fights (and people fights)

There is a community of people that go to Fort Funston that will disappear and this is a tragedy.

Are the horses allowed to stay on the trails and we are excluded?

How the heck are we suppose to keep 6 large, excited dogs on leash going down the trails? I had my finger broken by a dog pulling me down the beach. How safe do you think it is for someone to be expected to dragged by 6 dogs wanting to run free? Also, I need my hands free for safety. The trails are unstable and sometimes I need to use my hands to stabilize myself or grab branches or rocks.

Corr. ID: 4172

Organization: *Not Specified*

Comment ID: 208740 **Organization Type:** Unaffiliated Individual

Representative Quote: I have a degree in ecology and my first job was as in intern for the GGNRA at Fort Funston. I wanted to give you this information so you understand my commitment and knowledge of the ecosystem and plant community at Fort Funston. The current plan seems to blame dogs for all the damage and harm that comes to the native ecosystem life living there. This is false as anyone who works there or has worked there should be aware of. The real damage that you can see is the non-native invasive species such as ice plant, grasses, and other weeds which out compete the native species such as bi-color lupine, indian paint brush, and others that give our home part of its unique beauty. When I worked at Fort Funston in 1998, the GGNRA was able to restore two parts of the park. Both of these are thriving with native species and have not suffered damage from recreational use by the public or their pets. These remain to date the

only parcels of land which have been restored and with budget cuts ending the visitor center and native plant nursery, I don't see much hope for future restoration projects.

Corr. ID: 4533

Organization: *Not Specified*

Comment ID: 209690 **Organization Type:** Unaffiliated Individual

Representative Quote: I personally have observed and reported people climbing into fenced of vegetation areas at Crissy Field to take photos and to get better views during events, as well as children playing in the areas, running up and down the dunes. I have also observed people hiking off of the trails in the areas above Rodeo Beach and people on bicycles where they are not allowed. In addition, I have observed and reported large amounts of garbage and litter left behind after events, or not immediately picked up at the conclusion of the events, so that birds and other wildlife have foraged in the garbage, possibly ingesting harmful items. The dunes and fencing along the beach at Crissy Field are regularly impacted by the wind and tides. It is common for the park police horses to leave deposits along the trails in the park. I am really curious as to how the proposals for the America's Cup event (which I support) will impact the area and how that environmental analysis compares to the DEIS. All of these other impacts (and not just the ones I have listed as examples) must be evaluated as well before negative impacts are merely attributed to the presence of dogs.

Response:

Other factors that may affect vegetation and riparian areas have been considered in this draft plan/SEIS and are discussed in the cumulative impacts section in the Vegetation section of chapter 4. A paragraph was added to this section to make it clear that other factors do affect vegetation at GGNRA: "It is important to note that dogs are viewed as a contributing factor to impacts associated with vegetation and riparian areas, and the total elimination of dogs in the park would not eliminate effects on vegetation, because visitors without dogs would continue to visit the park and use GGNRA areas. 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. It has been suggested that dogs are an extension of their owners and the presence of a dog with a person involved in recreation (hiking) increases the radius of the human influence or disturbance beyond what it would be in the absence of a dog (Sime 1999, 8.2; Miller et al. 2001, 124). This influence is greater when a dog is off-leash than when it is walked on-leash (Sime 1999, 8.4). Sensitive environments can be subject to physical disturbance by dogs (through digging or bed-making) and could damage vegetation and soils, with resulting influences on vegetation, soils, and wildlife such as small mammal populations (Sime 1999, 8.9)."

VR4000 – VEGETATION AND RIPARIAN AREAS: IMPACT OF PROPOSAL AND ALTERNATIVES

Concern ID: 29625
CONCERN STATEMENT: Concentrating dogs into smaller spaces will result in greater impacts to vegetation within these restricted spaces. These areas will receive more wear and tear as a result.

Representative Quote(s): **Corr. ID:** 4569 **Organization:** *Not Specified*
Comment ID: 209831 **Organization Type:** Unaffiliated Individual
Representative Quote: The Preferred Plan for dogs at Fort Funston is nothing more than a dog park. If that limited area north of the parking lot is used by the same number of people and dogs that currently use the entire Fort Funston area then all the vegetation will be destroyed leaving sand blowing worse than it, does now. Also, that many dogs and people in a limited area will cause more conflict.

Response: The draft plan/SEIS located ROLAs specifically in areas that have either 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 ROLAs, 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. Additionally, the preferred alternative for the most heavily used site, Fort Funston, was modified to enlarge the upland ROLA into a corridor that includes two already-impacted areas and includes the north beach access trail connection to the beach ROLA, to better accommodate the anticipated use of this site.

Concern ID: 29626
CONCERN STATEMENT: Measures restricting dogs are necessary to protect the native vegetation found in the GGNRA. These areas should not be subject to the impacts of dogs and humans for their protection

Representative Quote(s): **Corr. ID:** 1052 **Organization:** *Not Specified*
Comment ID: 192139 **Organization Type:** Unaffiliated Individual
Representative Quote: Remind the Park Service that while dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals that rely on the park to survive. It is fair to ask dog owners to accept certain limits for areas where their dogs may play when the survival and well being of so many wildlife animals and plants is at stake.
Corr. ID: 1684 **Organization:** *Not Specified*
Comment ID: 191082 **Organization Type:** Unaffiliated Individual
Representative Quote: 1) There are many, many wilderness areas within GGNRA that are close to being pristine - with abundant wildlife and plant life that should be protected, with minimal impact by humans or

domesticated animals, because unfortunately these all do impact these areas negatively - these areas are so vast, it would be impossible for rangers & park police to patrol adequately.

Corr. ID: 2221 **Organization:** *Not Specified*
Comment ID: 200825 **Organization Type:** Unaffiliated Individual
Representative Quote: This document proposes a way to protect native vegetation in national parks located in the SF area. For that reason, it should be supported.

Response:

See response to Concern ID 29620 regarding the main objectives stated in the draft plan/SEIS which includes protection of native wildlife and their habitat (including vegetation) from detrimental effects of dog use. The preferred alternative in the draft plan/SEIS limits dog walking access, and in many sites, restricts dog walking to on-leash only to protect native vegetation as well as wildlife. As an example, only on-leash dog walking would be allowed on trails, and in Marin County that use is restricted to the perimeter of core habitat, and is limited to only some of the trails in other undeveloped sites since with this use there is a higher likelihood of impacts to adjacent resources such as wildlife and vegetation. Fences or barriers, and signage, have also been proposed in this draft plan/SEIS to protect sensitive vegetation. ROLAs have not been proposed in sensitive or newly restored areas so unleashed dogs should not affect newly planted native vegetation. In the few cases where there are sensitive areas near a ROLA, fences either already exist, or are proposed, to protect listed species and sensitive habitat, such as at Crissy Field's Central Beach or at Muir Beach, or a buffer zone exists that provides a division between areas, such as on Ocean Beach.

Concern ID:
CONCERN
STATEMENT:

29627
Marshes, dunes, and other fragile vegetated habitats are often full of dogs. It is important to both remove dogs from this area to protect vegetation and wildlife habitat. In many cases, commenters noted that the preferred alternative would still have impacts on flora, and suggested that alternative D be chosen instead.

Representative Quote(s): **Corr. ID:** 2965 **Organization:** Urban Estuary Network
Comment ID: 203616 **Organization Type:** Unaffiliated Individual
Representative Quote: Crissy Field

Working on plans for Crissy Field (I chaired the Sierra Club's wetlands committee and advocated for the marsh alternative) I had the clear understanding that dogs would be banned entirely from the west end of the Promenade. Part of the tidal marsh was sacrificed to accommodate the grass Airfield, designated for doggy romps and to compensate dog people for loss of the western Promenade.

As you know, the tidal prism in the marsh is inadequate for good flushing and needs expanded. However, I rarely see people playing with their canine pals on the grassy field. I do see them walking their pet off-leash on the western end of the Promenade.

As a consequence, dogs keep running into the Wildlife Protection Area, off-leash and accompanied by their owners. The WPA has in recent years become a Snowy Plover hangout and needs more stringent protections than currently provided.

While the dog people at Crissy are considerably less scofflaw than at Ocean Beach and Ft Funston, they will take some time and some coaxing (plus enforcement) to avoid disturbances to the WPA wildlife.

Corr. ID: 4315 **Organization:** State of California Department of Fish and Game

Comment ID: 209393 **Organization Type:** State Government

Representative Quote: 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.

Corr. ID: 4315 **Organization:** State of California Department of Fish and Game

Comment ID: 209391 **Organization Type:** State Government

Representative Quote: 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.

Response:

Concern ID:

**CONCERN
STATEMENT:**

See response to Concern ID 29620 and Concern ID 29626.
29628

Some areas do not contain endangered plants, so there is no need to ban off-leash dog walking. The removal of ice plant and other habitat restoration projects have negative impacts by causing more sand to blow around in areas where this occurs.

Representative Quote(s): **Corr. ID:** 4577

Organization: *Not Specified*

Comment ID: 209677 **Organization Type:** Unaffiliated Individual

Representative Quote: 2. Absence of Critical Habitat Protection. At the open house held at Fort Mason, one of the senior rangers confirmed that there were few, if any endangered flora at Fort Funston because of decades of urban and natural degradation beginning with the area's use as a military complex. I have also not seen anything in the NPS Report that suggests otherwise, other than declaratory general statements that there would be some adverse impacts. Yet, the NPS's preferred solution would close the entire area to off-leash dog walking.

As for fauna, where bank swallows or other birds nest on a seasonal basis, the NPS has a reasonable solution that adequately balances competing interests by simply closing those affected areas on a temporary basis to off-leash dogs or, if necessary, to any dog-walking activity.

Corr. ID: 4659

Organization: *Not Specified*

Comment ID: 209070 **Organization Type:** Unaffiliated Individual

Representative Quote: As to Fort Funston, I believe the 2001 closures there have not lent significant benefit to the environment or safety. The Park Service has not achieved the planned native plant restoration goals and is not anticipated to do so for decades. On the other side, the closures have led to a substantial loss of key recreation access to a unique recreational asset ' the only big sand dune in the Bay Area. I used to watch kids play there, and confess to the joy of rolling down the hill myself in foolish middle age exuberance. It is now just a fenced off vacant sand dune area standing as a daily frustration and visible monument to Park Service deviation from the recreational access mandate of the park.

Response:

The draft plan/SEIS does acknowledge that the non-native ice plant was used historically used in some GGNRA sites to stabilize the sand, and that other projects do negatively affect vegetation at GGNRA, as discussed in the cumulative impacts of the Vegetation Section of chapter 4. Off-leash dog walking is not being banned at GGNRA; all but one of the action alternatives, including the preferred alternative, provide off-leash dog walking within ROLAs in areas where sensitive vegetation does not occur. Two of the goals of the GGNRA dog management plan were to allow dog walking and to provide a variety of visitor uses and experiences throughout the sites addressed by the draft plan/SEIS. The preferred alternative would continue to allow on-leash dog walking and off-leash dog walking in ROLAs, while also providing no-dog experiences throughout the sites. The

NPS acknowledges that while habitat restoration projects may indeed have some short-term adverse impacts through soil disturbance, the long-term benefits of removing non-native plant species far outweighs the short-term effects as reestablished native vegetation would both stabilize soil and support native wildlife.

VU2010 – VISITOR USE AND EXPERIENCE: AFFECTED ENVIRONMENT

Concern ID: 30419

**CONCERN
STATEMENT:**

Visitors have never had incidents with dog waste on the beach, or with the smell of urine being strong enough to impact their visitor experience. Additionally, visitors did not feel that the sound of barking took away from the experience of the GGNRA, particularly more so than other non-natural noises.

Representative Quote(s): **Corr. ID:** 286

Organization: *Not Specified*

Comment ID: 181012 **Organization Type:** Unaffiliated Individual

Representative Quote: And dog ownership in Marin County is a big thing -- you are limiting access to people who want to enjoy the outdoors with their companions (their dogs) for what reason? How many more restrictions are you going to put on people? The dogs aren't hurting the beach. Maybe signs need to be bigger about cleaning up after their dogs, but honestly, I've never had an incident where I've found any dog poo on the beach.

Corr. ID: 4369

Organization: *Not Specified*

Comment ID: 209512 **Organization Type:** Unaffiliated Individual

Representative Quote: My experience is that dog owners are cleaning up after their dogs and respecting posted restricted areas. I looked for site-specific data on damage to protected wildlife and the environment that would support your proposal to severely restrict off-leash dog areas. I could find no data of the extend of the damage or specific causal ties to off-leash dogs at Crissy Field. I also could not find any trend numbers correlating off-leash dog use to deterioration of the environment. I found no scientific study to support your highly-restricted conclusions.

Corr. ID: 4600

Organization: *Not Specified*

Comment ID: 206053 **Organization Type:** Unaffiliated Individual

Representative Quote: I want to point to one factor that the report identified as an important 'natural' resource to protect ' soundscapes. The report found the topic to be important enough that it warranted its own subsection on Visitor Use section of the document (page 281). Barking is specifically called out as something that disrupts the soundscape, yet the areas addressed in the DEIS with dog usage all fit the following criteria:

- They are frequented by visitors
- They currently are subject to some sort of use with dogs

In any of the areas that fit that criteria, a change to the dog regulations fails spectacularly to address the primary degradation in the natural soundscapes.

Fort Funston faces a reduced off leash area to a ROLA next to the parking

lot and the beach. However, the areas eliminated along the paved trails get the constant noise of both the traffic on Skyline Boulevard and the constant return of gunfire from two gun ranges immediately outside of the GGNRA.

Crissy Field in San Francisco abuts a heavily trafficked park road. It also gets the constant traffic noise from Doyle Drive (or the construction thereof), and it gets the shipping noises and fog horns from the bay. The changes hardly serve any improvement with these areas.

Ocean Beach runs along the great highway with its constant vehicle traffic which is only abated by special events such as the Bay to Breakers. This event is hardly known for its natural soundscapes.

Fort Baker is now home not only to traffic on the roads, but also Cavallo Point resort. This activity is hardly one that creates a 'natural' soundscape.

Corr. ID: 4622 **Organization:** *Not Specified*
Comment ID: 207053 **Organization Type:** Unaffiliated Individual
Representative Quote: Soundscape -

The DEIS does not include relevant information related to the soundscape at Fort Funston and cites dog barking as an issue. As an almost daily user of Fort Funston, it is my experience is that there is very little dog barking, and what dog barking does occur primarily occurs inside vehicles in the parking lot. Changing the current off leash to the "preferred alternative" will not decrease dog barking. In fact, the change to the "preferred alternative" will result in the increase of dog barking in other parts of Fort Funston as the "preferred alternative" off leash areas are too small to accommodate the amount of users (for which NPS has not conducted any accurate statistical site survey of users), and dogs restrained on leashes in other parts of the Fort are much more apt to bark than when they are off leash.

No reference is made in the DEIS to the constant noise from the very heavy use of Hwy 1-Skyline Blvd by cars, trucks and buses. This can be heard in all parts of Fort Funston with the exception of the beach. No reference is made in the DEIS to the gunshot noise of the Pacific Rod & Gun Club range adjacent to Fort Funston which can be heard through all areas of the Fort, excluding the beach area. No reference is made to the noise from the SF Police Gun Range adjacent to the Fort Funston, that seemingly is operated 24/7 and can be heard through all parts of the Fort, excluding the beach. No reference is made in the DEIS to the noise made by the hang gliders. No reference is made in the DEIS to the noise made by model airplanes. No reference is made in the DEIS to the noise generated by the significant number of SFO passenger jet takeoffs over Fort Funston and / or parallel to the beach and in climb out prior to turning eastbound (depending on SFO flight rules then being utilized.)

Response:

Comments noted in revised chapter 3, Visitor Use and Experience.

Concern ID:
CONCERN

30420
[Visitors mentioned that waste present on the beaches and trails from dogs is](#)

STATEMENT:

unclean, and that the smell and unsanitary conditions make it less desirable to go to areas with heavy dog walking use. Some visitors relayed stories of stepping in dog waste. Additionally, visitors noted that the sounds of dogs barking negatively impacted the visitor experience, particularly for those who were seeking natural sounds, and did not want to hear dogs or noises associated with dogs.

Representative Quote(s): **Corr. ID:** 1159

Organization: *Not Specified*

Comment ID: 193458 **Organization Type:** Unaffiliated Individual

Representative Quote: Many dog owners allow their dogs to poop in the sand on Ocean Beach, making it difficult for others to enjoy. Dogs poop all over the trails making enjoyment of a routine walk on the any of the trails less likely

Corr. ID: 2161

Organization: *Not Specified*

Comment ID: 200577 **Organization Type:** Unaffiliated Individual

Representative Quote: I strongly oppose any dogs in the GGNRA. In this, I am supported by many others; seniors like myself, disabled people, blind people, many of whom have refrained from using the GGNRA where irresponsible dog owners refuse (and most often are not able)to control their dogs. Dogs are a huge liability. You cannot share spaces with them; they run all over everything -- including you -- they bark, whine, yap, thus destroying the beautiful sounds of nature with their angry, hostile noise. They urinate and defecate everywhere. Some of them are vicious, and attack people and other animals at will. Even the leashed ones befoul any area they are in.

Corr. ID: 2175

Organization: *Not Specified*

Comment ID: 200568 **Organization Type:** Unaffiliated Individual

Representative Quote: When I visit any of our National Parks, I want to be in the park, with nature, enjoying what is there. I prefer not to hear anything other than the sounds of nature and those of my fellow park visitors. That includes the barking and play-noises of dogs greeting other dogs.

I would also prefer that the natural environment of the park not be torn up by the rough-housing of dogs.

Corr. ID: 2340

Organization: *Not Specified*

Comment ID: 195388 **Organization Type:** Unaffiliated Individual

Representative Quote: My daughter is 5 years old and I began taking her to Crissy Field at the age of 1. I stopped at the age of 2. The first problem with Crissy Field is that the overwhelming smell of dog urine is nauseating and disgusting. Why would we want our children digging in this sand? The next issue is that the dogs were constantly running through my picnic blanket and sniffing my daughter. With the issues we've had in this town, we all know how scary and dangerous it can be when a big dog gets exciting around a small child.

Corr. ID: 2892 **Organization:** *Not Specified*
Comment ID: 202973 **Organization Type:** Unaffiliated Individual
Representative Quote: Although much wildlife in busy parks has had to become somewhat habituated to human encroachment (we ourselves are not a good presence for wildlife), even a well-behaved dog presents an olfactory threat that may cause an endemic species to permanently abandon its food or shelter source , but often the harm is much greater than that:

Dog waste contains microbes that are not part of the biota of our naturally-evolved native ecosystems, and this waste enters terrestrial and aquatic life cycles.

Dogs can flush out and chase fauna, harm native vegetation, and assist in spreading serious diseases (such as SOD), because most dogs do not maintain all feet on the provided trail at all times.

Dogs can cause noise pollution, run or jump at strangers, and impede forward progress of hikers, runners, bicyclists, and equestrians. These dog behaviors can severely scare nearby wildlife and many types of visitors. Dogs can sometimes "take" wildlife to the point of death.

As a visitor I have seen most of the above incidents occur first hand, and all of them happened with a dog still on a leash!

Corr. ID: 4519 **Organization:** *Not Specified*
Comment ID: 209582 **Organization Type:** Unaffiliated Individual
Representative Quote: My grandchildren have not had access to the beach at the tidal entrance to Crissy Marsh due to excessive dog use in that area.

My grand-daughter, then age 7, stepped into dog feces hidden in the grass of Crissy Field. I would like to see the future dog area on Crissy Field fenced.

Response: Comments noted in revised chapter 3, Visitor Use and Experience.

Concern ID: 30422
CONCERN STATEMENT: Visitors, including those with guide dogs, related that they had been frightened by dogs running up to them, or had incidents with dogs biting, jumping on them, or urinating on them, and the presence of dogs, particularly out of control dogs, has significantly compromised the experience for these visitors. Visitors felt stressed out by the presence of so many dogs, and some visitors had either stopped visiting GGNRA after several similar negative experiences, or had started carrying sticks and other items in self defense.

Representative Quote(s): **Corr. ID:** 506 **Organization:** *Not Specified*
Comment ID: 181898 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a Guide Dog user as is my daughter and several of our friends. When we go to any beach, either regulated by GOGA or San Francisco Maritime NHP, we have had some problems with dogs off leash. Our dogs are never left to run off leash, one because they are working dogs, and two, because it is unsafe not only for them but for us as well. It is very disconcerting when you have a dog, who is not on leash, running up to

your dog, sometimes causing trouble, or just wanting to play, and distracting our dogs when they are trying to work.

Corr. ID: 961

Organization: *Not Specified*

Comment ID: 191595 **Organization Type:** Unaffiliated Individual

Representative Quote: We tried to walk there once when our children were toddlers and were approached by bounding dogs at every turn. The owners would sometimes call out "don't worry; he's friendly" but we were still sufficiently intimidated not to return. My parents, who are not steady on their feet, have given up walking there for the same reason.

I would like to raise an important point, which is that many of Fort Funston's visitors who are not dog walkers have by now completely given up using the park. I almost never go there myself and my parents don't either, though it was, at one time, our favorite park in San Francisco.

Corr. ID: 1712

Organization: *Not Specified*

Comment ID: 191150 **Organization Type:** Unaffiliated Individual

Representative Quote: The GGNRA did not have as many dogs in the past. Over the past 10 years, I have noticed an explosion of dogs. I used to be ok with sharing the park with the odd dog walker, but now I find that I can't go to the park because there are so many dogs and so many dogs off leash. For this reason, I believe that off leash and on leash areas for dogs should be decreased.

Corr. ID: 1829

Organization: *Not Specified*

Comment ID: 191950 **Organization Type:** Unaffiliated Individual

Representative Quote: As a long time resident of Marin, who has enjoyed the beaches at Stinson and the trails on Mt. Tam for many years, I believe the dog population of this area has become an aggravation if not a hazard to residents. At Rodeo Beach I have had an off leash dog urinate on my head as I lay face down on a beach towel. "So sorry" was the apology of the owners. "Voice control" of pets is an illusion as a 100 pound animal bounds over to pedestrians and sometimes to children-"he's just friendly" says the owner

Corr. ID: 4200

Organization: *Not Specified*

Comment ID: 208831 **Organization Type:** Unaffiliated Individual

Representative Quote: The trail a couple of blocks from my house, Alta, has for years been used heavily by dog walkers who arrive with a large number of dogs and allow them to roam off-leash. I love dogs, however the sight of a large pack of off-leash dogs coming towards me frankly makes me nervous. Once, I was completely surrounded by barking dogs while carrying my baby. The dog walker, in the distance, called the dogs, but they were slow to obey.

My husband avoids the trail now, too, since an off-leash dog bit him.

Corr. ID: 4277

Organization: *Not Specified*

Comment ID: 209083 **Organization Type:** Unaffiliated Individual

Representative Quote: I now walk with my Leki walking sticks, which I usually reserve for wilderness walks. but which I now feel I must walk with

in order to use them in self-defense. Pedestrians in San Francisco and in the GGRNA should. NOT feel that they can only walk if armed.

Corr. ID: 4665 **Organization:** National Parks Conservation Association

Comment ID: 209149 **Organization Type:** Non-Governmental
Representative Quote: Other user groups, such as those with service dogs, have stated their concerns with off-leash dog use. One survey from Guide Dog Users, Inc. concluded that 89% of guide dog users report off-leash dogs interference with the guide-owner team and 42% report physical attacks on the guide-and-owner team.

Response: Comments noted in revised chapter 3 and 4, Visitor Use and Experience.

Concern ID: 30423

CONCERN STATEMENT: Visitors noted that they had never had an incident with dog owners or other users of the park, or seen any altercations between humans and dogs. Visitors have not experienced issues with dogs entering restricted areas, or harming vegetation or wildlife. All the user groups were able to utilize the space harmoniously, and many visitors felt dog owners improved the parks

Representative Quote(s): **Corr. ID:** 560 **Organization:** *Not Specified*
Comment ID: 182034 **Organization Type:** Unaffiliated Individual
Representative Quote: Fort Funston has been a treasure for taking our dog where she can run with other dogs in a natural environment. The vast majority of people who walk the trails and on the beach are dog owners. I have never seen owners allowing their dogs to go into restricted areas where there is vegetation growing. While I am sure there are some violators, even with new rules there will be violations. I understand that there must be rules in this park, but is there a problem currently that requires that you be more restrictive than at present.

Corr. ID: 1162 **Organization:** *Not Specified*
Comment ID: 193476 **Organization Type:** Unaffiliated Individual
Representative Quote: There are not that many locations where I can bring my dog to enjoy the outdoors without multitude of restrictions or not at all. Over the course of my time of using the trails, I have come across only respectful and courteous dog owners and people alike all enjoying nature harmoniously.

Corr. ID: 3498 **Organization:** *Not Specified*
Comment ID: 203386 **Organization Type:** Unaffiliated Individual
Representative Quote: I would like to make a brief comment as a dog owner and citizen. I have walked my dogs off leash at Fort Funston for almost 20 years. During that time, I have been impressed by the collegiality and care for the environment shown by the user groups. I have also seen impressive restoration of native vegetation, which has not been in any way disturbed or impeded by the presence of dogs off leash. Almost all of the dog owners I have encountered over the years have been respectful of the off limits areas, have cleaned of after their dogs, and have cooperated with

Park Service personnel. In an era of budget cuts to our National Parks, the presence of many responsible dog owners is a real benefit as this kind of usage helps keep Fort Funston safe and accessible for all. Based on all of the above and on the lack of very few alternatives for safe and healthy off leash dog walking in the urban environment of San Francisco, I VERY STRONGLY oppose the proposed restrictions in the proposed Dog Management Plan. As a responsible dog owner and citizen, I believe that these new rules are unwarranted, unfair, and will have a negative long term impact on Fort Funston and the GGNRA if they are implemented. I have contacted my elected representatives about this and will remain actively engaged to do everything in my power to insure that this wonderful resource for people and dogs - many of whom are from shelters - remains available to our community.

Corr. ID: 4163 **Organization:** former member of the San Francisco Commission on Animal Control and Welfare

Comment ID: 208727 **Organization Type:** Unaffiliated Individual
Representative Quote: I've never been a guardian to a dog but in the four years I took my granddaughter to the park when she was a baby, then a toddler, I never saw any conflict between the above three concerns. On the contrary, one morning I saw a young mother with a toddler and a big dog, off leash in Mountain Lake Park (a medium-sized park in the Richmond District of San Francisco with a little lake, lots of birds, children and off-leash big dogs who do not restrict themselves to just the off-leash dog run) showing her little daughter how to pick up their dog's feces and dispose of it responsibly, then after thoroughly brushing the dog for a while, she gathered his combed out fur and placed the soft furry ball behind some bushes surrounded by trees. Noticing we were watching her, she explained with a smile: "The birds like the fur for their nests."

Corr. ID: 4187 **Organization:** *Not Specified*
Comment ID: 208776 **Organization Type:** Unaffiliated Individual
Representative Quote: As a windsurfer I have for years made considerable use of the beach at Crissy field in harmony with dog users. Having spent much more time as a user without a dog I believe I can impartially state that the dog use at any of the Crissy field areas has not posed a problem for me or anyone I know or have seen in the parks.

Corr. ID: 4201 **Organization:** self, City College of San Francisco employee
Comment ID: 208839 **Organization Type:** Unaffiliated Individual
Representative Quote: If you've ever personally spent time walking in the Ft. Funston area or Ocean Beach or any number of open spaces, you would see, as I have seen, a lovely and serendipitous mix of dogs running free and parents with children (or single parents on their cell phones as their toddlers run into the ocean), people flying kites, surfers, picnickers, joggers, yogis, lovers, the elderly out for a stroll, and friends playing ball. Perhaps you have not noticed the lonely, the grieving, the disabled, the mentally ill-all of them finding solace in nature and, many of them, in the curative powers of

a pleasant exchange with dog-owners, dog-walkers, and dogs-open and free, easy and non-threatening.

Corr. ID: 4223 **Organization:** Crissy Field Dog Group
Comment ID: 208945 **Organization Type:** Unaffiliated Individual
Representative Quote: Personally, I visit Crissy Field several times a week, on average, and I have not seen a dog altercation in several years. I have never seen a dog be aggressive to an adult or a child. With the many dogs that are there on weekdays, and the hundreds that are there are weekends, I think that is quite remarkable, and certainly does not justify the restrictions being put forth in the GGNRA's preferred alternative.

Corr. ID: 4520 **Organization:** *Not Specified*
Comment ID: 209589 **Organization Type:** Unaffiliated Individual
Representative Quote: Over the many years I have enjoyed and explored the GGNRA I have never witnessed a serious encounter between people with their dogs and the native wildlife. Dogs may chase birds for a while, but I have never seen a dog catch a bird. Nor have I seen an owner encourage the behavior. Generally I have witnessed dog owners intervene, restrain and discourage their dogs from endangering wildlife.

Response: Comments noted in revised chapters 3 and 4, Visitor Use and Experience.

Concern ID: 30425
CONCERN STATEMENT: Dog owners who are unfriendly or belligerent, and/or do not have their dogs under true voice control, undermine the experience of other visitors to the park, who do not like listening to dog owners yelling to control their dogs. Some commenter noted that dog owners were rude when asked to leash their dogs, pick up waste, or leave restricted areas, and that when incidents occurred, dog owners often blamed the other visitor. Many visitors also relayed experiences of having dogs trample or steal food from their picnics or out of their hands, and urinating on their property, or just generally impacting their experience at the park.

Representative Quote(s): **Corr. ID:** 1160 **Organization:** *Not Specified*
Comment ID: 193465 **Organization Type:** Unaffiliated Individual
Representative Quote: live in SF and try to enjoy GGNRA weekly, but it has become more difficult with the proliferation of off-leash dogs at Crissy Field, Ocean Beach and Lands End. I have been attacked by dogs on numerous occasions. Last month I was yelled at by a dog owner after her dog attacked me. She told me that I must have food in my pockets. This is ridiculous. It has become so contentious on these walks that people definitely have a harder time enjoying these areas than they used to.

Corr. ID: 1816 **Organization:** *Not Specified*
Comment ID: 191805 **Organization Type:** Unaffiliated Individual
Representative Quote: I am compassionate about protecting our lands and the native habits they support. This is why I am writing today in support of the most stringent controls on dog owners.

Of concern to me are animals under "voice control". I loved reading the

idea in the plan to have dog/owner certified as being under voice control prior allowing them off leash. My experience with owners who say their dogs are under voice control is listening to them yell the same commands (usually, 'come here' and 'don't do that') time and time again without result. I like the serenity of a park stroll and this yelling does undermine my experience.

Corr. ID: 2187 **Organization:** *Not Specified*
Comment ID: 200581 **Organization Type:** Unaffiliated Individual
Representative Quote: On many hikes and visits to GGNRA parks, I and my two young children, have been approached by unleashed dogs. Both of my children are now terrified of dogs and the owners have little remorse or concern for the safety or well being of my children.

I often ask owners to leash their dogs when my children are around. I receive rude comments and many times people ignore my requests and do not leash their dogs. As a parent and visitor to the GGNRA I need authority and enforcement to ensure that people keep their dogs on leashes to keep the rest of us safe and free to enjoy the parks.

Corr. ID: 2556 **Organization:** *Not Specified*
Comment ID: 195652 **Organization Type:** Unaffiliated Individual
Representative Quote: I am in favor of your proposal.

I live directly across the street from an open space district which hosts dogs and walkers of all shapes and sizes. I put out a water dish and keep it filled, in an attempt to be friendly and neighborly to both dogs and walkers.

There is no such thing as voice control. Our weekends are punctuated by untrained dog walkers yelling for their dogs. Dogs routinely crash through the underbrush chasing deer and squirrels. We once had a dog chase our cat into our house through the front door.

At your beaches we have experienced, in addition to the above, untrained dog walkers watching their dog urinate on our family's toys spread on the sand. How do you explain that to a child?

You are wise to allocate a budget for enforcing your plan.

Please keep up the good work and implement your plan

Corr. ID: 3705 **Organization:** *Not Specified*
Comment ID: 202241 **Organization Type:** Unaffiliated Individual
Representative Quote: As a frequent user of the parks, I have been concerned for some time about the increasing number of dogs allowed in the parks, particularly off-leash, and especially in beach and riparian areas. Although my primary concern is the disruption of wildlife habitat, I also feel that there are virtually no park areas left where a person can take a walk, observe nature, meditate, etc., without the presence of dogs.

Far too often I encounter ill-trained dogs off-leash, chasing shore birds, etc., and sometimes being actively encouraged by their owners to do so. I generally find that if I attempt to approach these people to voice my concerns, I am met with hostility.

On occasion dogs have jumped up on me, sometimes quite forcefully, and I have been left with muddied clothing and in one instance a knee injury. Sometimes the owners have been apologetic, but other times they just laugh at how playful their dogs are, as if no one could possibly experience discomfort at the prospect of being run into and jumped upon by a 50-pound animal. I was in a picnic area once designated as on-leash only, and a dog ran up and ate the hot dog right off of my plate. When I said something to its owner about the leash rule, he told me that I needed to educate myself about the park rules, as it was okay to have a dog off leash if it was under voice control. This struck me as so absurd, given the circumstances, that I did not bother to respond.

I could go on at length about other encounters with dog owners that left me feeling discouraged and disturbed, but the gist of my point is that I do not believe that rules for either on-leash or voice-control areas are enforceable, simply because most people do not obey the rules and there is no one to see that they do. I don't think that either dogs or dog owners are inherently bad. But I do think that we have become a "dog society" in which, no matter what the rules, dog owners do not really believe that they apply to them. Alternatively, I sometimes speak to people who had no idea that dogs were not allowed in a particular section, or only allowed on-leash. And I have to say that these designations are easy to blur. If an area is designated on-leash only, dogs will be off leash. If an area is voice-control, dogs will be running around without any supervision.

Corr. ID: 3852

Organization: *Not Specified*

Comment ID: 209324 **Organization Type:** Unaffiliated Individual

Representative Quote: 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.

Corr. ID: 4024

Organization: *Not Specified*

Comment ID: 206982 **Organization Type:** Unaffiliated Individual

Representative Quote: I cannot fully enjoy walking at Crissy Field or Land's End because I have had many unpleasant interactions with dogs and their inconsiderate owners. I have been hit hard in the back by catapulted balls, been shocked when a large dog jumped from behind onto my hips and legs, felt scared when another dog jumped on my legs and closed its mouth

around my fingers, and have repeatedly dodged whirlwinds of dogs chasing each other. I enjoy well-behaved dogs in appropriate places, and in the past owned a wonderful, trained dog, but do not invite interaction with strange dogs. Every time a dog aggressively approached me without my beckoning, I politely, yet firmly, confronted the owner, and each time I was met with incredible rudeness. I have never encountered a ranger around the time of the incident to report the interaction.

Response: Comments noted in revised chapters 3 and 4, Visitor Use and Experience.

Concern ID: 30429

CONCERN STATEMENT:

Having dogs present in the park significantly improves the visitor experience for many at the park, who either enjoy bringing their dogs, like being around other dogs, or feel safer with dogs and dog owners present. Having dogs in the parks allows visitors to form social groups, and get out and visit these areas when otherwise they might not visit these sites. Dog owners police each other to make sure waste is picked up and restricted areas are protected. Other user groups in the park cause far more problems than dogs and dog owners, and the dog-walking community significantly enriches the experience of many park users.

Representative Quote(s): **Corr. ID:** 1860 **Organization:** Self
Comment ID: 209622 **Organization Type:** Unaffiliated Individual
Representative Quote: We only get positive remarks and smiles with our pug off-lease even though he can be known as a "picnic crasher" as visits people relaxing on blankets and walking about.

Corr. ID: 3637 **Organization:** *Not Specified*
Comment ID: 205056 **Organization Type:** Unaffiliated Individual
Representative Quote: Most of the people with dogs I know or meet are equally positively affected by their dogs. In contrast, I've observed many uneducated adults and children littering, yelling and scaring wildlife, throwing rocks and sticks at or chasing animals, or cutting trails and causing erosion, leaving big ruts in trails with their bikes. No user group of the GGNRA is perfect. To punish dogs by taking away what little off-leash land they currently have is unreasonable and unfair. It will lead to problems between humans and dogs when dogs cannot be properly exercised and socialized and when humans are less exposed to dogs and therefore don't have the opportunity to learn how to act with dogs.

Corr. ID: 3822 **Organization:** *Not Specified*
Comment ID: 204945 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs provide unconditional love and acceptance, unending entertainment, and motivation to get out of the house, exercise, unplug, and enjoy the real world. These are benefits to individuals and benefits to society. With all of the negative and harmful activities that take place on public lands, and throughout society in general, it is simply beyond reason why a positive and harmless activity has been selected for new rules and restrictions. For dog lovers, and there are a lot of us, our outdoor activities center around walking our dogs. We walk and explore together and we enjoy the freedom together. Banning dogs from certain areas and

restricting dog walking to a leash only activity in other areas may seem like a ban or restriction on dogs, and that is bad enough, but the effect is that it bans a targeted group of people from those areas, and that is discriminatory and unreasonable.

Corr. ID: 4025 **Organization:** *Not Specified*

Comment ID: 207061 **Organization Type:** Unaffiliated Individual

Representative Quote: I have to say that rather than being bothered by the presence of dogs we and our dogs have been stopped on countless occasions with people - both locals and tourists - proclaiming how happy they are to be able to come to an area where they can enjoy the outdoors AND the presence of dogs (sometimes they are dog lovers who live in apartments where no dogs are allowed, so they come to the beach for their "dog fix"; other times tourists have spoken wistfully of their canine friends left at home and express appreciation for an opportunity to be reminded of them and to see dogs so well-integrated into the social life and recreational environments of the City).

Corr. ID: 4034 **Organization:** *Not Specified*

Comment ID: 207157 **Organization Type:** Unaffiliated Individual

Representative Quote: Dog owners seem always on the look out for ways to be respectful to this important access to the natural environment, while I have witnessed many non-dog owners abusing the recreational privileges of the parks by littering or sitting, spreading a blanket or holding a picnic in areas that are meant to be protected and off-bounds to people and domestic animals. Enforce desired protections by citing both non-dog-owners and dog-owners alike who may be in violation. Though I'd venture to say very few are dog owners.

Corr. ID: 4106 **Organization:** *Not Specified*

Comment ID: 208478 **Organization Type:** Unaffiliated Individual

Representative Quote: During that time, I've given birth to two children who consider FF to be their second home. As a family we have bonded with each other and with other similar-minded families. We even bring our 80-year-old neighbor every Tuesday because he loves to be around the unleashed dogs. It's a wonderful place that, if not for its off-leash access, we would not have had the privilege of knowing and appreciating. Please continue to allow families like ours to enjoy this special open space with our dogs off leash.

Corr. ID: 4179 **Organization:** *Not Specified*

Comment ID: 208763 **Organization Type:** Unaffiliated Individual

Representative Quote: Walking at Fort Funston I encounter people of just about all ethnicities, social classes, and orientations, brought together by their interest in socializing their dogs and enjoying the outdoors. I have never seen any kind of altercation like I regularly encounter in other City environments. Off-leash dog walking fosters a very special sense of community, which the DEIS will destroy.

I request that the DEIS be amended to study this historically significant community that has evolved in Fort Funston and other pockets of the GGNRA lands.

Corr. ID: 4236

Organization: *Not Specified*

Comment ID: 209240 **Organization Type:** Unaffiliated Individual

Representative Quote: I am not clear that dogs do any more damage than their human counterparts do. For instance, one day, after dogs were newly restricted to leashes-only along the northern section of Ocean Beach, I witnessed a youngster throwing rocks at the snowy plovers. The adults who accompanied him, presumably his parents, did nothing to stop him. At Ft. Funston, I have, on various occasions, watched teenagers etch their names into the sand dunes along the beach or looked on as people without dogs slide down the large dunes up top, an area ostensibly cordoned off. On the other hand, volunteers comb for dog feces on a monthly basis at Ft. Funston.

Corr. ID: 4320

Organization: *Not Specified*

Comment ID: 209438 **Organization Type:** Unaffiliated Individual

Representative Quote: I have never encountered a more cohesive, caring, self-policing, and diverse community. I have met other disabled and senior folks who visit Fort Funston for many of the same reasons I do. One woman told me she knows if she collapses on the trail due to her health condition (as happened to her once before), she and her dog will be taken care of by the people there. Finding this unique community has been essential to my wellbeing and I don't want to see it disappear.

Corr. ID: 4533

Organization: *Not Specified*

Comment ID: 209692 **Organization Type:** Unaffiliated Individual

Representative Quote: The Plan/DEIS seems to focus on the "visitor experience" as one for people who don't want to be around dogs. However, not only are there people who go to the park with their dogs but there are people who go there without dogs to be around and enjoy interacting or observing the dogs.

It gives those people a wonderful visitor experience and that experience should be analyzed and acknowledged in the Plan/DEIS as well.

Response:

Comments noted in revised chapters 3 and 4, Visitor Use and Experience.

Concern ID:
CONCERN
STATEMENT:

30432

Some visitors who were participating in non-dog activities, like biking, horseback riding, or hang gliding, mentioned that their experience and activities had been impacted by having dogs in the same areas at the GGNRA, while other commenters mentioned that unleashed dogs were often present in areas that were designated as on-leash only, or areas where dogs are not allowed. Having so many dogs in these areas put many visitors who were not comfortable with dogs in a position of conflicting with dog owners. These visitors felt uncomfortable under these circumstances.

Representative Quote(s): **Corr. ID:** 1236 **Organization:** *Not Specified*
Comment ID: 194894 **Organization Type:** Unaffiliated Individual
Representative Quote: I am even driven away from on leash areas due to the large number of off leash dogs in on leash areas. Runners can not run in areas with off leash dogs because dogs run after them and also often dart in front of them and cause them to stop running. It is very disruptive and makes it impossible for off leash dogs and runners to share the same space.

Corr. ID: 2088 **Organization:** *Not Specified*
Comment ID: 200561 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a runner and cyclist who uses the Crissy Field promenade, East Beach, and Fort Mason areas several times per week. I have had several "near miss" encounters with both aggressive dogs and small yappy dogs off leash running at me, darting in front of me, and otherwise coming very close to injuring me both at Fort Mason and Crissy Field.

I also frequently launch my kayak off of East Beach, and have had negative and frightening labrador encounters. One time, a large dog swam up to my boat near shore and nearly capsized me, as the owner seemed unconcerned. I also regularly collect 3-4 gross abandoned dog-chewed tennis balls from the water when i'm out off east beach. This is yet another negative environmental impact that dogs are having.

I 100% believe that the current situation is unsafe and inappropriate, and i fully support the Park Service's proposal to bring dogs under better management, while still allowing some areas for off-leash use.

Corr. ID: 4070 **Organization:** Mar Vista Stables
Comment ID: 207672 **Organization Type:** Unaffiliated Individual
Representative Quote: Equestrians who ride on the beach and on Fort Funston proper have coexisted with dog walkers, hang gliders and other visitors for decades. In the past ten years, however, the lack of guidance and enforcement and inconsistent policies have led to increased incidents between off leash dogs and horses. While the majority of dog owners (including those who ride horses with off-leash dogs) keep their dogs under voice control, incidents have increased and continue to threaten the health and safety of other visitors. Because of the danger, many visitors choose not to frequent Fort Funston allowing the perception that the entire area is only a "dog park" and creating the feeling that the park service is violating their multiple use mandate by catering to a single user group.

Corr. ID: 4190 **Organization:** *Not Specified*
Comment ID: 208789 **Organization Type:** Unaffiliated Individual
Representative Quote: "I know dogs can be such a distraction!" the lady with the large dog said with a friendly chuckle, a form of apology to several park visitors who were startled by the approaching animal. The people were doing tai chi in a grove of trees in the Presidio. The dog was off leash in an on-leash area. This happened several days ago.

Corr. ID: 4269 **Organization:** *Not Specified*
Comment ID: 209096 **Organization Type:** Unaffiliated Individual
Representative Quote: As a senior citizen, I don't feel safe when dogs are allowed to run free. I have been bitten, had my food taken, water shaken on me and had dogs running between my legs causing me to fall, while owners of the dogs did nothing to prevent these occurrences. And the owners disrespect posted signs and get defensive when they are pointed out.

Corr. ID: 4408 **Organization:** *Not Specified*
Comment ID: 206406 **Organization Type:** Unaffiliated Individual
Representative Quote: At Fort Funston, I and a group of friends, while riding our bikes there, experienced a problem with dogs. We biked around Lake Merced and decided to ride up to the ocean overlook at Fort Funston. The path up was full of off-leash dogs and dog owners, standing and talking, making no effort to get out of the way, or to remove their dogs from the multiuse path. Some of the dogs barked and growled. We had to get off our bikes and walk. Weeks later, we tried this a second time, wondering if we had just hit a bad day, but the experience was the same. If dogs are going to be in the GGNRA at Fort Funston, they need to be on leash or in a fenced area. They are not compatible with other users of our national park.

Corr. ID: 4464 **Organization:** *Not Specified*
Comment ID: 208638 **Organization Type:** Unaffiliated Individual
Representative Quote: In the Sutro Heights Park near my house, there are signs saying "Pets on leash" at each entrance, but it is rare to be there without seeing at least some unleashed dogs, and on several occasions I have seen at least 30, right on the main pathways

Response: Comments noted in revised chapters 3 and 4, Visitor Use and Experience.

Concern ID: 30434
CONCERN STATEMENT: Some commenters suggested that the visitor experience section of the draft plan/EIS focuses too much on visitors who do not enjoy dogs, while others felt this group was not adequately addressed in the draft plan/EIS. Some visitors felt that minorities who enjoy dogs were not discussed, while other visitors noted negative impacts from uncontrolled dogs on guide dogs in the park.

Representative Quote(s): **Corr. ID:** 413 **Organization:** *Not Specified*
Comment ID: 181580 **Organization Type:** Unaffiliated Individual
Representative Quote: I also recently discovered that people with guide-dogs have not been able to enjoy the park due to attacks on the guide-dogs by other dogs. Because the laws are not enforced, disabled people are forced out of the parks. Please, protect this already discriminated against group. I urge the GGNRA to protect the wildlife and protect the park's visitors from dogs.

Corr. ID: 3504 **Organization:** *Not Specified*
Comment ID: 201186 **Organization Type:** Unaffiliated Individual
Representative Quote: Every time I have visited Ft. Funston over a ten year period, I have seen a wide diversity of people recreating there. Many

of the dog owners I see at Ft. Funston are Latinos, Asians and African Americans, and the people range in age from children to people in their 80s. In fact, I see a more diverse group of people at Ft. Funston than I have ever seen at national parks that do not allow dogs. I often bring visiting family and friends from Mexico to Ft. Funston to see what a wonderful place we have for people who like to walk out in this beautiful part of San Francisco with their dogs.

The GGNRA is not a national park and it is not a pristine wilderness area. It is a recreation area. I oppose all of the proposed alternatives in the Draft Environmental Impact Statement, because they all are an attempt to change these areas from recreation areas into national parks, which is in direct contradiction to the mandate under which San Francisco granted these areas to the GGNRA.

I support the 1979 pet policy and believe that new areas acquired by the GGNRA should also include large off-leash, voice controlled areas so that Bay Area residents and our dogs can recreate there.

Corr. ID: 4130 **Organization:** *Not Specified*
Comment ID: 208558 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to oppose the GGNRA's Draft Dog Management Plan because the Visitor Experience section of the Draft Plan focuses on park users who don't want to be around dogs, including minorities, seniors and children.

I myself as a member of the minorities who visit GGNRA lands 4 days a week do not see such phenomenon described in the Draft Plan. In fact, many of my fellow Asian friends, with or without dogs, visit Ocean Beach and Fort Funston regularly.

Corr. ID: 4218 **Organization:** Save Off Leash, SFDOG, Sierra Club, Native Plant Society
Comment ID: 208918 **Organization Type:** Unaffiliated Individual
Representative Quote: The GGNRA states that people of color are afraid of dogs. When I go to these public areas, I see people of all races and nationalities. When I say this to people who are apparently of Asian, Hispanic, or Pacific Islander heritage, they roll their eyes. I'm regularly stopped in city parks by kids with parents in tow. If the parents don't speak English, we signal to make sure it's okay for their kids to touch my dogs. All their kids want to do is pet, play, throw the ball, and run.

Corr. ID: 4398 **Organization:** *Not Specified*
Comment ID: 209656 **Organization Type:** Unaffiliated Individual
Representative Quote: - Beyond ignoring park users with severe disabilities, you have also ignored a much larger constituency that includes the frail, the elderly, and parents with small children and people who legitimately fear dogs or those who simply want a dog-free experience in their recreation. It is the responsibility of the NPS to protect park resources for all its users, not to cater to pet owner preferences.

Response: Chapter 3 and 4, Visitor Use and Experience were revised to include the public's thoughts and opinions. This included visitors who enjoyed dogs and also those who did not enjoy dogs.

VU4000 – VISITOR USE AND EXPERIENCE: IMPACT OF PROPOSAL AND ALTERNATIVES ON VISITORS WHO ENJOY DOGS

Concern ID: 30438
CONCERN STATEMENT: Some visitors felt their experience while recreating with dogs would be lessened by having to leash their dogs in many areas. Other visitors stated that having dogs on leash, as proposed under alternative B, would make the parks more enjoyable for responsible dog owners to visit, as they would not have to deal with uncontrolled off-leash dogs.

Representative Quote(s): **Corr. ID:** 202 **Organization:** *Not Specified*
Comment ID: 180622 **Organization Type:** Unaffiliated Individual
Representative Quote: Overcrowding in off-leash areas will effectively exclude older dogs like mine who cannot see or hear well, and therefore will, quite simply, be knocked down and quite possibly injured by the younger, more active dogs. My dog likes to sniff and explore. I like to keep up a steady, rapid pace so that I derive full health benefits from my walk. My needs and that of my dog can only be mutually met if we are not joined by a leash.

Corr. ID: 1165 **Organization:** *Not Specified*
Comment ID: 193534 **Organization Type:** Unaffiliated Individual
Representative Quote: I fully support adopting NPS leash regulation (Alternative B) outlined in GGNRA's Draft Dog Management Plan. As a long-time dog lover and dog owner, I avoid GGNRA off-leash areas, partly because of the obvious degradation to the landscape wrought by dogs and their less-than-attentive owners, but mostly because I am sick and tired of dealing with people who don't have their dogs under control.

Corr. ID: 1183 **Organization:** *Not Specified*
Comment ID: 193561 **Organization Type:** Unaffiliated Individual
Representative Quote: please stand firm on leash laws and restrictions on loose dogs in all GGNRA areas. those of us who walk our dogs on leash, walk alone or ride horseback are tired of having to deal with out of control dogs running up to us.

Corr. ID: 1270 **Organization:** public
Comment ID: 194981 **Organization Type:** Unaffiliated Individual
Representative Quote: If off-leash is restricted, I will likely move away because walking my dog on-leash is less safe for him as other dogs can attack him and he cannot get away. I also can not get as good of exercise with a leash in my hands.

Corr. ID: 2075 **Organization:** *Not Specified*
Comment ID: 200546 **Organization Type:** Unaffiliated Individual
Representative Quote: I understand peoples' desire to let their dogs

exercise off-leash, but this is a safety issue. Both of my dogs have been attacked by dogs that their owners claimed were "harmless" in dog parks and I no longer go to places where dogs are allowed off-leash because the don't feel safe. These parks are meant for people to enjoy and they should be able to do so without feeling threatened.

Corr. ID: 2239 **Organization:** *Not Specified*
Comment ID: 200879 **Organization Type:** Unaffiliated Individual
Representative Quote: What having all dogs leashed does is takes away the joyfulness in bringing one's pet to a beach or a natural area (where endangering wild life is not an issue)

Corr. ID: 4455 **Organization:** *Not Specified*
Comment ID: 208509 **Organization Type:** Unaffiliated Individual
Representative Quote: I'm concerned that without off leash access, however, responsible people and their dogs will not have adequate opportunity for recreation and exercise. Having places in the GGNRA where I can daily take healthy walks with my dog safely off-leash is an experience that cannot be replaced by standing in a small city park, or walking restricted by a leash.

Response:

Some of the purposes of the draft plan/SEIS are to preserve and protect natural resources, provide a variety of visitor experiences, improve visitor and employee safety, reduce visitor conflicts, and to maintain park resources and values for future generations. Under the preferred alternative visitors would be able to visit areas that would provide a range of experiences, from areas where dogs are not permitted, to areas with only on-leash dog walking, and areas that provide for dog walking under voice control within ROLAs. Allowing for only on-leash dog walking at all sites, as outlined for alternative B, would help to reduce user conflicts, protect natural and cultural resources, but would not satisfy the need to provide a variety of visitor experiences, mainly an experience of off-leash dog walking. For more information on how the various alternatives allow for the various NPS goals, see chapter 2: How the Alternatives Meet the Objectives.

Concern ID:
CONCERN
STATEMENT:

30439
The presence of dogs running around GGNRA is something that many visitors liked to see. They noted that the proposed plan would take away from the atmosphere of the parks, and that the loss of off-leash dog walking in the GGNRA would negatively impact the lives of many dog owners, who enjoy taking their dogs on off-leash walks. These dog owners felt the restrictions would take away a valuable part of their lives and park experience. Some commenters stated that the plan would result in rangers having a more police-like presence in the park, which visitors felt would detract from their experience and their support of the park.

Representative Quote(s): **Corr. ID:** 1758 **Organization:** *Not Specified*
Comment ID: 191492 **Organization Type:** Unaffiliated Individual
Representative Quote: I strongly oppose the proposed draconian restrictions on off-leash dogs on GGNRA lands!

Although I don't have a dog myself, I am a frequent walker at Ocean Beach and Crissy Field, and it is a great joy to watch the dogs there running, swimming, fetching, digging, and otherwise having a wonderful time.

I can't see anything positive at all that would be accomplished by the proposed restrictions, whereas they would cause a serious reduction in the quality of recreation on GGNRA lands.

Corr. ID: 3536 **Organization:** *Not Specified*
Comment ID: 201297 **Organization Type:** Unaffiliated Individual
Representative Quote: I hope you will consider keeping off-leash space in the GGNRA available for the use of pets and their owners. While problem dogs (and their negligent owners) are of course a very legitimate concern, changing the law will not dissuade these people. They will be there with their dogs no matter what any law says. Unfortunately the people that will be affected are the conscientious dog owners who will no longer have a healthy and pleasant way to exercise and enjoy Crissy Field, Fort Mason, and the rest of the GGNRA alongside their dogs. While problem dogs need to be dealt with, by other dog owners and by park law enforcement, it should be remembered that a well behaved, happy dog is often a great enjoyment and source of happiness park visitors, even those unaccompanied by a dog of their own.

Corr. ID: 4313 **Organization:** *Not Specified*
Comment ID: 209383 **Organization Type:** Unaffiliated Individual
Representative Quote: The purpose of this letter is to let you know as a resident of San Francisco and a frequent visitor to Golden Gate Park and Crissy Field, I really do not like your plan to further restrict dog walking in the parks. Although I do not personally own a dog I often walk my sister's dog and love to see dogs and their owners in the park having a great time. You must realize San Francisco is a "dog city" and we need to provide them places like Crissy Field to get some exercise, socialize and enjoy the beautiful beaches. Your Alternative C would be far too hard on dogs and their owners.

Corr. ID: 4656 **Organization:** *Not Specified*
Comment ID: 209832 **Organization Type:** Unaffiliated Individual
Representative Quote: The people walking with their dogs that we see early every morning are every bit as environmentally conscious and appreciative of their surroundings as the theoreticians that drew up the proposed regulations. There are a number of us who sweep the beach each morning for unwanted debris. This consists of anything from non-dangerous, but unsightly pieces of styrofoam to more lethal objects like hypodermic syringes. We have also assisted in the reporting and protection of injured or sick sea lions and birds. In all the years we have enjoyed these walks, we have never seen one instance of dogs interfering with people walking on their own. On the contrary, the ones we meet all seem happy to greet us and our dogs

Please be aware of the irreparable damage that will be caused to the quality of life of those of us who frequent the recreation area on a daily basis, for

whom these off-leash walks have become such an important part of our lives.

Response: Comments were considered during revision of impact analysis. Please see chapter 4, Visitor Use and Experience for details.

Concern ID: 30440
CONCERN STATEMENT: The proposed plan would negatively impact the recreational opportunities of dog owners in the GGNRA by limiting the spaces and freedom they currently have in regard to dog walking, and this restriction of dogs into smaller areas will make the GGNRA less pleasant to visit for visitors with dogs, as they will be crowded, and there will be more incidents between dogs. Additionally, this plan would force dog owners to find alternative areas for walking, which may be hazardous, and dog owners and those who enjoy dogs felt they were not included as stakeholders in the decision-making process.

Representative Quote(s): **Corr. ID:** 1289 **Organization:** *Not Specified*
Comment ID: 195020 **Organization Type:** Unaffiliated Individual
Representative Quote: A host of reasonable, inexpensive and easy to administer changes have been proposed by interested groups supporting continuation of existing dog walking and off-leash parameters. These should be pursued, rather than the proposals recommended in the plan. The plan's proposals would adversely impact the experience of one set of users (dog owners), even though their numbers have grown and they pay the same taxes and fees as everyone else. We need and deserve a plan that treats all users equally.

Corr. ID: 1327 **Organization:** *Not Specified*
Comment ID: 195079 **Organization Type:** Unaffiliated Individual
Representative Quote: The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with dogs, and could lead to an increase in conflict as more and more people are forced into smaller and smaller areas. The impacts of people moving from the GGNRA into city parks is not adequately addressed in the DEIS.

Corr. ID: 1693 **Organization:** *Not Specified*
Comment ID: 191100 **Organization Type:** Unaffiliated Individual
Representative Quote: There is a huge population of responsible dog owners and their pets in Northern California. This plan seems to ignore this population, and their need for health, exercise, + enjoyment. There is already so little parkland that is available to dogs and their owners. And now that is going to shrink? Seems horribly restrictive + unfair. Many dogs need to run + play to get proper exercise, and that can't happen on a leash.

Corr. ID: 3199 **Organization:** *Not Specified*
Comment ID: 203958 **Organization Type:** Unaffiliated Individual
Representative Quote: I'm an Asian American woman and own a Bernese Mountain dog. She doesn't play fetch, doesn't particularly enjoy socializing with other dogs, but enjoys our hikes on the horse trails at Fort Funston,

where we have been going on weekends for years. She ignores the horses and other hikers (unless they want to greet her, which she loves), and we would be lost without these trails. I would not hike them without a dog at my side, and they enrich both our lives beyond words.

The Preferred Alternative assumes all dogs are dog-park dogs, which is unrealistic and based on ignorance of dog behavior and individual personality. If the Preferred Alternative goes through, there will be an abundance more of dog/dog aggression in fenced in dog areas than the alleged incidences -that seem to be more annoyances - that are faced in off-leash areas currently.

Response: Comments were considered during revision of impact analysis. Please see chapter 4, Visitor Use and Experience for details.

Concern ID: 30443
CONCERN STATEMENT: Many dog walkers would not come as frequently or at all to the GGNRA if the areas where dogs are allowed were restricted, or if they could not bring their dogs to the park. Visitors noted that without the presence of these dog walkers in the parks, the parks would be much emptier, and they would not feel safe visiting them. Some commenters noted that they would consider moving out of the area entirely if the proposed plan was enacted.

Representative Quote(s): **Corr. ID:** 515 **Organization:** *Not Specified*
Comment ID: 181923 **Organization Type:** Unaffiliated Individual
Representative Quote: If I was unable to take my dogs I would not hike in these beautiful lands. Many people I have met in the last few weeks agree that we would not be on the trails without our dogs. If you ban dogs I believe you will loose more than half the hikers on the trails. Please don't take away this beautiful privilege from us.

Corr. ID: 859 **Organization:** *Not Specified*
Comment ID: 186254 **Organization Type:** Unaffiliated Individual
Representative Quote: I feel quite strongly that the proposals to greatly diminish the off leash areas of the GGNRA is bad for the people of San Francisco, dog owners and non-owners alike. all I can imagine is an empty, run down park that without the many, many, dog walkers I probably would no longer feel safe visiting.

Corr. ID: 1709 **Organization:** *Not Specified*
Comment ID: 191139 **Organization Type:** Unaffiliated Individual
Representative Quote: 1) The ability to bring a dog w/me on my walks allows me to use the trails. It is safer on many levels..I wouldn't go on many trails alone without my dog.

Corr. ID: 1750 **Organization:** *Not Specified*
Comment ID: 191216 **Organization Type:** Unaffiliated Individual
Representative Quote: If you put in only dogs on leash the dog people will stop coming - why would they come they can walk their dogs on leash on the city street. You are alienating and losing an entirely group of free garbage collectors and safety people. Real shame. I won't come if you make

these changes. I don't own a dog - never have. But I feel safe.

Corr. ID: 3378 **Organization:** *Not Specified*
Comment ID: 203105 **Organization Type:** Unaffiliated Individual
Representative Quote: I'm a mother of a toddler and a dog owner, and it is difficult to find places to go where I can bring both my son and my dog. Playgrounds, for example, are dog-free. But as a city-dweller with no backyard, I need to exercise my dog - as well as be active with my family. We frequently spend our weekend days at Fort Funston and Chrissy Field, where both my son and my dog can run and enjoy the outdoors. If dogs are no longer allowed in these locations, or if their presence is severely restricted (as I believe your plan aims to do) the result will be that my family and I simply won't visit as often.

Corr. ID: 3639 **Organization:** *Not Specified*
Comment ID: 205062 **Organization Type:** Unaffiliated Individual
Representative Quote: He is off leash for an hour, we both get our daily exercise, and it is pure joy for both of us. There is a wonderful community of responsible and dedicated dog owners who are there every morning. This makes city living possible - and enjoyable - for me. IF there were no off leash areas where we could exercise together and enjoy the surrounding beauty before I go to work every day, I would likely move out of the city.

Response: A dog walking redistribution survey was developed, completed, analyzed, and incorporated into the impact analysis. Please see chapter 4, Visitor Use and Experience for more details.

Concern ID: 30444
CONCERN STATEMENT: Commenters supported alternative A, as it provides sufficient areas for dogs to run, which is necessary to serve the recreational needs of dog owners in the Bay Area. Visitors enjoy the park under the current rules and feel changing these rules would lessen their experience at the GGNRA.

Representative Quote(s): **Corr. ID:** 516 **Organization:** *Not Specified*
Comment ID: 181924 **Organization Type:** Unaffiliated Individual
Representative Quote: I support Alternative A, no change to dog walking requirements. I do have not a dog, but I appreciate how hard it is for dog owners to find spaces where their dogs can run. I take frequent hikes at some of the areas affected by this proposed change, and I enjoy the mixed human-dog environment. Any inconvenience to me is outweighed in my estimation by the benefit.

Corr. ID: 1392 **Organization:** *Not Specified*
Comment ID: 195300 **Organization Type:** Unaffiliated Individual
Representative Quote: I'm a native San Franciscan and I don't have a dog. These proposals seem overly stringent -- dogs need to run off leash. I do hope that you re-consider and leave things as they are. People and their dogs need a lot of off-leash areas. These areas are too limited as it is.

Corr. ID: 4002 **Organization:** *Not Specified*
Comment ID: 206246 **Organization Type:** Unaffiliated Individual
Representative Quote: The time my family and I spend outside with our dog has been a wonderful experience for all of us. Our lab is in voice control on most trails with few people and on leash where required or there are just too many people/dogs around. Either way, GGRNA has been the reason we live where we do. Please leave the dog laws as they have been.

Response: Following the public comment period, the preferred alternatives were modified to allow some additional off-leash and on-leash dog walking areas at selected sites.

Concern ID: 30445
CONCERN STATEMENT: If the proposed restrictions were implemented, it would result in the loss of a community of dog walkers. Many visitors felt this community was their main tie to the GGNRA, and for many, it is a main channel of social interaction. Visitors felt the loss of this community would have a negative impact on their quality of life.

Representative Quote(s): **Corr. ID:** 2800 **Organization:** *Not Specified*
Comment ID: 201097 **Organization Type:** Unaffiliated Individual
Representative Quote: I urge you to make no further restrictions on off-leash dog walking in the Golden Gate National Recreation Area. The opportunity to walk dogs off-leash provides a unique recreational opportunity for Bay Area residents such as me to exercise not only our dogs but also ourselves. In the process, we are able to meet and interact with diverse people from the community with whom we would not otherwise interact in our daily lives, such as at work or in our own neighborhoods.

Corr. ID: 4239 **Organization:** *Not Specified*
Comment ID: 209235 **Organization Type:** Unaffiliated Individual
Representative Quote: I oppose the preferred alternatives in the DEIS regarding dog walking in the GGNRA lands and future lands to be acquired. First, I mourn the loss of community that will result as I and other citizens that walk their dogs in the GGNRA are no longer able to meet and walk our dogs off leash together there. This will have a major impact on my life as nearly every friend I have is someone I met at Fort Funston. My social life revolves around walking my dog at Fort Funston. I have built up a network of friends that I see at Fort Funston as I and my dog take our daily exercise there. To lose that is to essentially lose my entire social life. As I understand it, the historic use of Fort Funston, for about the last 40 or 50 years, is as an off-leash dog park. Please allow this historic use to continue.

Corr. ID: 4386 **Organization:** *Not Specified*
Comment ID: 209565 **Organization Type:** Unaffiliated Individual
Representative Quote: For another, given my mental and physical condition, I live a relatively isolated life. I've been able to meet people, get to know them and their dogs, and now I'm at the point where the only socialization I get is within these groups. I value that highly, and I know most of us won't frequent these areas without our dogs and I will lose

contact with those friends. I'm uncomfortable in most social situations and don't have visitors to my home, so I would be even further isolated if I couldn't take my dogs to the beach.

Corr. ID: 4645

Organization: *Not Specified*

Comment ID: 208979 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS treats the GGNRA as if it is a pristine National Park - however - the GGNRA is an urban recreation area. I have made some of my closest friendships within the dog community at Fort Funston. Lasting friendships that have continued for years throughout the lives of many dogs, miscarriages, pregnancies, deaths and graduations. For me, the GGNRA provided a community that I could go to daily at the same time and walk with the same people (and our dogs). Every day, I had a community where I could share my struggles and be heard and listen to other's struggles and offer my support. This is what life should be like. The GGNRA areas in San Francisco are communities with a culture based upon a shared recreational activity - off-leash dog walking. This culture provides our community with places to exercise our dogs, while enhancing the social, physical, emotional and spiritual aspects of being human. The openness of the lands of the GGNRA offer what few city parks are able to - and the mass numbers of dogs and people who would need to use city parks if they were unable to utilize GGNRA lands would be unbearable.

Response:

Comments were considered during revision of impact analysis. Please see chapter 4, Visitor Use and Experience for details.

Concern ID:

30447

**CONCERN
STATEMENT:**

Having a fence along Oakwood Valley Trail will lessen the wilderness experience of visitors to the park, including those that do not have dogs with them.

For additional representative quotes, please see Concern 30459 (VU4005), Comment 193389.

Response:

The ROLA on the Oakwood Valley trail 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 ROLAs on trails.

Concern ID:

30449

**CONCERN
STATEMENT:**

Some commenters said that they would ignore the proposed restrictions if they were enacted, and would instead break the law at the risk of getting a ticket. Other visitors felt that non-compliance would increase if dog owners were not provided ample room for legal off-leash dog walking, so the laws would only negatively impact those who follow them already.

Representative Quote(s): **Corr. ID:** 1186

Organization: *Not Specified*

Comment ID: 193565 **Organization Type:** Unaffiliated Individual

Representative Quote: If you succeed in banning dogs on Ocean Beach, I will ignore the law. So will most people. If you are going to give me a

ticket for walking my dog on a public beach next to my house, I am not going to bother leashing him, since you are going to give me a ticket anyway. I will still clean up after my dog, because I care about my beach. Like a lot of dog owners, I pick up trash on the beach when I'm out walking my dog. My guess that we probably pick up more trash than we leave as a whole. When I see another dog owner not cleaning up after their dog, I speak to them. I don't like dog waste and litter on the beach either. I love my beach. I love my dog. I'm not giving up either without a fight.

Corr. ID: 3989 **Organization:** *Not Specified*
Comment ID: 207372 **Organization Type:** Unaffiliated Individual
Representative Quote: Further, by my observation and in my experience, there are quite a number of restrictions on off-leash use of GGNRA land already in place, but enforcement seems to be the real issue. I fear that if these more restrictive regulations are enacted, it will only be the law-abiding dog owners who will suffer; the scoflaws won't care about the new restrictions--just as they don't follow existing laws now.

I have also observed that when people and their families walk with their pets, they are more open to meeting other people, usually via inquiries about their pets. In the years we've had our dog, we've met more people and engaged in pleasant conversations with strangers than I have ever experienced in all my years before owning a dog. I truly believe pets can bring out the best of humanity in us all.

Response: It is the visitors' choice whether or not to comply with the new dog regulations; however, once implemented after an initial education period, the new regulation will be strictly enforced and those not complying with the regulations will be ticketed.

Concern ID: 30451
CONCERN STATEMENT: [Although visitors liked dogs generally, many expressed that the current situation was out of control with dogs in the GGNRA. These visitors felt some more restrictions would benefit all users, and supported the proposed alternatives, including alternative C, at various sites.](#)

Representative Quote(s): **Corr. ID:** 75 **Organization:** *Not Specified*
Comment ID: 181835 **Organization Type:** Unaffiliated Individual
Representative Quote: I agree 100% with the restricted area's for dogs in the Presidio, Crissy Field area of the San Francisco Bay, it's about time! I love dogs but over the last couple of years its really gotten out of control there, children play in the sand where dogs do their business and run all over the place, while most owners aren't paying much attention. Also, dog fights break out often, causing adult frustration and arguments, I hope this helps the situation.

Response: The preferred alternatives would allow ample dog walking opportunities in a controlled environment. Comments were considered during revision of impact analysis. Please see chapter 4, Visitor Use and Experience for details.

VU4005 – VISITOR USE AND EXPERIENCE: IMPACT OF PROPOSAL AND ALTERNATIVES ON VISITORS WHO DO NOT ENJOY DOGS

Concern ID: 30452
CONCERN STATEMENT: Having dogs allowed in the GGNRA compromises the experience of visitors at the GGNRA who do not enjoy interacting with dogs. Visitors felt that many areas they previously enjoyed had been significantly degraded from the presence of dogs. Some visitors felt that they would not want to have an experience that included off-leash dogs anywhere in the GGNRA except in designated areas. Having these areas so that visitors that do not enjoy dogs can avoid them would provide a better park experience. Areas with dogs, particularly off-leash dogs, should be decreased.

Representative Quote(s): **Corr. ID:** 244 **Organization:** *Not Specified*
Comment ID: 180811 **Organization Type:** Unaffiliated Individual
Representative Quote: I feel all dogs need to be on leash in all public parks, except in designated fenced areas. I do not wish to encounter dogs anywhere in parks, possibly excepting on leash with owners required to pick up their leavings.

NO DOGS!

Corr. ID: 281 **Organization:** *Not Specified*
Comment ID: 180945 **Organization Type:** Unaffiliated Individual
Representative Quote: Such a program would also allow park rangers and law enforcement officers to more easily enforce the rules of the ROLAs. Although the ROLAs will allow for separation between those visitors with and without dogs, it might also offer benefits to the latter group by reducing their concerns, causing fewer complaints and perhaps even encouraging visitors who might otherwise avoid the GGNRA.

Corr. ID: 2791 **Organization:** *Not Specified*
Comment ID: 201140 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to support the new policy to restrict off-leash dog walking. The behavior of dogs at GGNRA beaches is not only disruptive to the enjoyment of the area but is also threatening and potentially hazardous to people, especially children.

I have visited GGNRA beaches regularly for the past thirty-two years. Since the birth of my children, I have been particularly aware of the problems dogs pose to other beach users. When my children were infants, they were routinely bothered, terrorized, or knocked down by dogs chasing a ball thrown by its master or by a pack of out-of-control, "happy" dogs playing. If, after such incidents, I had a dollar for every time an oblivious dog owner said that their dog was friendly and loved children, I would be a very rich man. I grew tired of having to console my crying daughter after she was chased and/or knocked over by a dog at the beach. This was especially problematic at Crissy Field, so much so that we had to stop using the park entirely. This is not a live and let live situation - there are victims here.

I think that dogs should be banned from the GGNRA beach areas or be required to be on a leash. There are hundreds of acres in the nearby parklands for dogs to run free. Unrestricted off-leash dog access to the beaches is unacceptable due to the disruption and hazard it poses to individual users (especially children) of these natural areas.

Corr. ID: 3373

Organization: *Not Specified*

Comment ID: 203098 **Organization Type:** Unaffiliated Individual

Representative Quote: I support any action the NPS can take to lessen the presence of unleashed dogs within the boundaries of GGNRA. I have been attacked by dogs twice in the past and when I see dogs unleashed it causes apprehension as I am walking along the trail. In fact, if I see an unleashed dog I usually walk the other way or stand to the side as the animal passes. So, my first reason for requesting a ban on all unleashed dogs from the park is the negative impact that unleashed dogs have on people, diminishing our ability to enjoy the trails of GGNRA. As one of the goals of the Park Service is to promote the enjoyment of our national parks, the presence of unleashed dogs prevents enjoyment for a significant number of people.

My second reason for opposition to unleashed dogs is the impact on wildlife, especially species that are on the endangered species list. While most dogs don't stray into areas where endangered species are located, there is enough of an impact from straying dogs that scientists have determined that there is a negative impact. We cannot allow a "tragedy of the commons" in GGNRA by allowing large numbers of people to unleash their dogs. It is simply not a good idea.

If the NPS determines that some accommodation must be made to the dog owners, then I hope that unleashed dogs will ONLY be allowed in areas with high fences that prevent the dogs from straying into sensitive habitats.

Lastly, those who violate the rules should be fined in a way that makes it clear that the NPS is serious about protecting the resources of GGNRA. In other words, a stiff fine would be appropriate.

Response:

Comments were considered during revision of impact analysis. Please see chapter 4, Visitor Use and Experience for details. The preferred alternatives provide many opportunities for visitors to enjoy the park without the presence of dogs.

Concern ID:
CONCERN
STATEMENT:

30454

The proposed regulations would benefit those visitors who feel that that presence of unregulated dogs at many sites in the GGNRA hinders their time spent at the site, or prevents them from visiting the parks. While some visitors supported restrictions on dog, they worried that the proposed regulations would increase their negative experiences with dogs in other areas of the GGNRA, local dog parks, and on city streets as dog owners would likely walk their dogs in these areas if they were restricted in the GGNRA.

Representative Quote(s): **Corr. ID:** 1044

Organization: *Not Specified*

Comment ID: 192121 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm for more restrictions on dogs in the Golden Gate National Recreation Area. I'm a 63 year old San Francisco resident. I used to frequently visit Crissy Field but haven't been there in a long time. A few weeks ago I did make a new attempt but as I drove up saw two dog-walkers with 5-10 dogs each, and thought to myself this is not a place to enjoy a walk.

There are just too many dogs. A person with several dogs cannot keep them under voice control.

Too many people let their dogs run loose along the main walk ways. They may think their dogs are nice and well-controlled but not all people think that.

Not everyone likes dogs. Some people have had very bad experiences with dogs attacking them, biting them, even mauling them.

Corr. ID: 1164

Organization: *Not Specified*

Comment ID: 193533 **Organization Type:** Unaffiliated Individual

Representative Quote: I am in support of the proposed GGNRA Dog Management Plan.

Another very upsetting point is regarding Fort Funston. The place is completely taken over by dogs - not just a single owner with a dog or two, but dog walking "services" with 5-10 dogs each. I decided to go running on the trails there a few weeks ago and couldn't take more than a dozen steps without being surrounded by dogs. It looked like a kennel and was just a complete waste of a beautiful property. I had to turn around and leave. I won't be going back there, or even recommending it to friends, until something is done.

I sincerely hope the Dog Management Plan moves forward so San Francisco residents can enjoy land that has since been taken over by dogs.

Corr. ID: 1244

Organization: *Not Specified*

Comment ID: 194927 **Organization Type:** Unaffiliated Individual

Representative Quote: I support the NPS preferred alternatives for dog management. I want the ability to observe the birds, sketch the views and plants and feel safe. I fear for myself and children being knocked about, nosed and licked by frolicking dogs because I have seen this happen. Having approved areas where I can choose to be or not to be around dogs meets my needs.

Corr. ID: 1393

Organization: *Not Specified*

Comment ID: 195310 **Organization Type:** Unaffiliated Individual

Representative Quote: There is a very large unleashed grass area where dog owners can allow their dogs to run, play catch and roam freely where people without dogs do not even go. While this area is large it is often at capacity. I think reducing the number of unleashed dog areas in recreational areas of SF will pose a potential safety threat to non-dog owners and

children and result in further damage to the terrain of our natural spaces which are so precious in an urban environment. An increase in the number of dogs to Stern Grove due to closures in other parks would increase all of the aforementioned concerns.

Corr. ID: 1435 **Organization:** Golden Gate Mothers Group
Comment ID: 195623 **Organization Type:** Unaffiliated Individual
Representative Quote: I have a small child and we use the GGNRA regularly. I am very concerned that if you close the offleash areas then there will be more conflict between dogs and kids. As it is they are fairly separate, but make the dogs go on leash and they will move from the waters edge, and on to the walks with the strollers. NOT GOOD. I prefer the dogs playing with each other, tiring each other out, not on the paths getting tangled up and knocking my child over.

Response: A dog walking redistribution survey was developed, completed, analyzed, and incorporated into the impact analysis. Comments were considered during revision of impact analysis. Please see chapter 4, Visitor Use and Experience for more details.

Concern ID: 30455
CONCERN STATEMENT: Commenters noted that leash laws or banning dogs from certain areas would provide a better experience for those visitors that do not enjoy interacting with dogs. Dogs should be on-leash in the GGNRA to protect resources and provide a better experience for visitors who may not feel comfortable with off-leash dogs, as having dogs present in the parks may impact the safety and experience for some visitors.

Representative Quote(s): **Corr. ID:** 309 **Organization:** *Not Specified*
Comment ID: 181053 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs off leash are a real problem in the GGNRA. I have personally seen dogs digging up wildlife in the GGNRA and harassing birds. I fully support more leash laws or banning dogs from certain areas (or from the whole park) to protect the wildlife. I also support leash laws or banning dogs from certain areas to create dog free space for people who are uncomfortable with dogs to enjoy.

Corr. ID: 1273 **Organization:** *Not Specified*
Comment ID: 194987 **Organization Type:** Unaffiliated Individual
Representative Quote: I would like to see more dog free zones created and enforced. My husband is disabled and it is important that he walks. He needs a cane because he is unstable and is easily caused to fall. He fell in the park because he a dog ran up to him and jostled his cane. Luckily he was on a soft surface and suffered no fractures. However, in a slightly different location the outcome would have been much worse. He no longer goes to the park for this reason.

Corr. ID: 1794 **Organization:** *Not Specified*
Comment ID: 200287 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs, both on leash and especially off leash, have negative impacts on birds and other wildlife. Off leash dogs can inhibit

visitors from feeling comfortable and enjoying areas of the GGNRA, particularly the beach at Crissy Field, all of Fort Funston and most of Ocean Beach. Fort Funston is so totally overrun by dogs that it can no longer be enjoyed for hiking and bird watching.

In the GGNRA dogs should always be on leash. Compliance needs to be strictly enforced, 100%. Commercial dog walking should not be allowed in the GGNRA.

Habitat and wildlife preservation should always be the priority for the GGNRA. Greater restrictions on dogs are overdue and badly needed.

Corr. ID: 3843 **Organization:** *Not Specified*
Comment ID: 208757 **Organization Type:** Unaffiliated Individual
Representative Quote: Earlier this month while walking along the beach of Crissy Field, I was startled several times by unleashed dogs that came up behind me barking, this is not the first time this has happened to me and frankly does not add to my experience at the beach. On this particular walk I was almost knocked over by a dog as it ran into me chasing a ball. If the dogs were leashed I believe that I would not have been barked at and almost knocked over because people have more control over the dogs.

Response: Comments were considered during revision of impact analysis. Please see chapter 4, Visitor Use and Experience for details. The preferred alternatives include multiple areas for both on-leash and off-leash dog walking in addition to areas where no dogs would be allowed.

Concern ID: 30457
CONCERN STATEMENT: [Alternative D would be the most favorable option for visitors who do not enjoy dogs in the GGNRA.](#)

Representative Quote(s): **Corr. ID:** 100 **Organization:** *Not Specified*
Comment ID: 181936 **Organization Type:** Unaffiliated Individual
Representative Quote: I AVOID and DO NOT USE Chrissy Field and other areas of the GGNRA which are overrun with off-leash dogs. It is scary, annoying, and full of dog poop.If the GGNRA chooses to establish fenced, contained, off-leash dog-run areas (preferably segregated by dog size), that's great. Otherwise, all dogs in the GGNRA should be on a leash. I prefer Alternative D in the EIS.

Response: Comment noted. While alternative D was not chosen as the preferred alternative for most sites, there would be many areas throughout the park available for a no-dog experience.

Concern ID: 30459
CONCERN STATEMENT: [The fencing on Oakwood Valley trail will negatively impact the visitor experience of all visitors, including those who do not enjoy dogs.](#)

Representative Quote(s): **Corr. ID:** 2118 **Organization:** *Not Specified*
Comment ID: 193389 **Organization Type:** Unaffiliated Individual
Representative Quote: Continuous fencing on Oakwood Valley trail will

significantly diminish enjoyment of the natural environment for all users including non-dog accompanied humans and horse back riders using this trail. Huge negative aesthetic impact.

Response:

The preferred alternative for Oakwood Valley was modified; the ROLA 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 ROLAs on trails.

Concern ID:

30460

CONCERN STATEMENT:

The presence of dog waste in areas was cited as a major reason that many visitors did not enjoy having dogs in the GGNRA, and was one reason these commenters supported restrictions on dog walking.

Representative Quote(s):

Corr. ID: 2057

Organization: None

Comment ID: 200544 **Organization Type:** Unaffiliated Individual

Representative Quote: I fully support the Nps preferred alternative in this eis. There are plenty of places for dogs, but only a few for rare wildlife. Also, dogs detract from experiences in nature as their owners don't always pick up their waste and when they are off leash, they could be especially disruptive. Park services lands are the prize of the public lands system and the highest priority should be given to preserving wildlife and their habitats and conserving the natural elements that make experiences in the national parks so special for all.

Corr. ID: 2651

Organization: *Not Specified*

Comment ID: 195455 **Organization Type:** Unaffiliated Individual

Representative Quote: The National Park Service number one priority should be to the wildlife in the area. Please restrict off leash areas. Irresponsible dog owners have riddled the area with dog poop and made the area unpleasant for people who do not have dogs to visit. The few times I have visited Fort Funston I have been disgusted by the amount of dog poop on the grounds. I have not returned in over a year. It is too bad that a handful of irresponsible and unpleasant dog owners can ruin the area for everyone.

Corr. ID: 3024

Organization: Golden Gate Raptor Observatory,
California Native Plant Society

Comment ID: 201002 **Organization Type:** Unaffiliated Individual

Representative Quote: Finally, as a frequent volunteer/visitor, I get really disgusted and have zero tolerance for dog poo that's left behind, and just the possibility of it makes my visits to the beach much less enjoyable. For this reason alone, I think that at least half of your beaches should be dog-free.

Response:

Currently, section 36 CFR 2.5(a)(3) of the GGNRA Compendium requires that "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)." However, current compliance with regulations is low at many sites in the park. The proposed regulation would also require dog walkers to

pick up their dogs' feces immediately and dispose of them in a garbage container. Education and outreach would be a large part of the proposed action alternatives to help inform and educate the public. During the implementation of initial education and enforcement, park staff would increase contact with park visitors to educate them about GGNRA regulations. Following this initial education period, warnings or citations would be issued for visitors who are not in compliance with dog waste regulations. This regulation would be strictly enforced to ensure compliance.

Concern ID:
CONCERN
STATEMENT:

30461

The preferred alternative does not provide enough trails for visitors who enjoy hiking the trails without dogs, or other areas for those visitors who seek a dog-free experience. Under the proposed plan almost all the trails in San Francisco allow dogs on leash on trails.

Representative Quote(s): **Corr. ID:** 2382 **Organization:** *Not Specified*
Comment ID: 202168 **Organization Type:** Unaffiliated Individual
Representative Quote: The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation

Corr. ID: 4215 **Organization:** San Francisco League of Conservation Voters
Comment ID: 208886 **Organization Type:** Conservation/Preservation
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: 4410 **Organization:** *Not Specified*
Comment ID: 206942 **Organization Type:** Unaffiliated Individual
Representative Quote: The plan does not provide an adequate amount of hiking trails and picnic areas where visitors can enjoy a dog-free, National Park quality experience. Within San Francisco, the plan provides no significant area where park visitors can spend the day hiking and/or picnicking in a dog free environment. A solution to this problem would be to designate all of the coastal bluff areas, from the Golden Gate Bridge to and including Baker Beach, as a dog-free zone.

Corr. ID: 4695 **Organization:** Golden Gate Audubon Society
Comment ID: 264333 **Organization Type:** Conservation/Preservation
Representative Quote: The Draft Plan Fails to Provide Adequate Opportunities for Dog-free Recreation on Trails in San Francisco.

Under the Preferred Alternative, dogs will be allowed on leash on all but one trail in the GGNRA in San Francisco. Therefore, visitors to the park who prefer not to interact with dogs will be restricted to a single trail.

Response: Comments were considered in the impact analysis. Please see chapter 4, Visitor Use and Experience for more detail.

Concern ID: 30462
CONCERN STATEMENT: Commenters believed that enforcing the current regulations would provide adequate protection for those visitors who do not enjoy interacting with dogs, and noted that visitors who did not enjoy dogs had other areas to visit in the parks and local area.

Representative Quote(s): **Corr. ID:** 248 **Organization:** *Not Specified*
Comment ID: 180820 **Organization Type:** Unaffiliated Individual
Representative Quote: Bottom line it seems that the biggest concern is for people who do not prefer dogs and I think they should avoid those areas that they know there is a possibility that they might run into dogs (and that doesn't mean that people who let dogs off-leash shouldn't be responsible for their dogs being trained to obey voice commands to leave people alone and generally behave politely) and go to the MANY other places that they can enjoy the same activities where dogs are not allowed.

Corr. ID: 2877 **Organization:** *Not Specified*
Comment ID: 202893 **Organization Type:** Unaffiliated Individual
Representative Quote: I enjoy walking Crissy Field on a regular basis. While many dog owners are respectful - there are many who allow their animals to run in areas clearly marked otherwise. I have had dogs off leash jump up on me, run into me - while the owner only offered a limp "sorry". All could have been avoided with a leash or taking the animal to a designated area to run free. I don't believe new regulation is needed - just enforce the laws all ready in place.

Corr. ID: 2890 **Organization:** *Not Specified*
Comment ID: 202970 **Organization Type:** Unaffiliated Individual
Representative Quote: I am very concerned about the fact that the current boundaries for the off-leash area are not currently being enforced. Young children and older adults should be able to use the area without concern of being attacked or even just knocked over by off-leash dogs

Response: The preferred alternative provides a variety of dog walking experiences, as well as experiences for those who prefer to visit the parks without dogs throughout the park that does not exist under current conditions. Enforcement of the new regulation would provide safe, controlled experiences for all visitors, whether with, or without, dogs.

VU4025 – VISITOR USE AND EXPERIENCE: PROFESSIONAL DOG WALKERS

Concern ID: 30465
CONCERN STATEMENT: Commenters oppose or are concerned that professional dog walkers are running a commercial business free of charge at GGNRA at the cost of

others and the park. It has been suggested that commercial dog walking should be prohibited at GGNRA.

Representative Quote(s): **Corr. ID:** 2905 **Organization:** *Not Specified*
Comment ID: 202625 **Organization Type:** Unaffiliated Individual
Representative Quote: Commercial dog walking should not be allowed. Commercial dog walking does not relate to the purpose and mission of the National Parks. Commercial dog walking provides no service or benefit to park users, has negative impacts on park resources and park visitors, and serves only for the capital gain of private enterprises at the expense of the American public.

Commercial dog walking will require additional annual expenditures for administering and overseeing a permitting process, additional law enforcement, additional resource maintenance and additional public relations.

The DEIS estimates that over 1000 dogs will be commercially walked within the GGNRA daily (p. 63 p. 276). Commercial dog walkers, with up to six dogs, will negatively impact the experience of park visitors on trails and in other areas of the park. If permitted, commercial dog walking activity will increase within the GGNRA and will displace park visitors, of all legitimate user groups, from areas of the park. Commercial dog walkers will dominate the ROLAs, displacing other park visitors. Commercial dog walking vehicles will occupy parking spaces resulting in fewer spaces available for park visitors. If allowed, commercial dog walking operations will have a dominant presence in some areas of the park thus affecting the overall character and ambiance of those areas.

Currently, commercial dog walking is not permitted within the GGNRA or any other National Park unit and there is no justifiable reason to do so. The NPS is well within the scope of its management directives to not allow commercial dog walking and I support this position.

Corr. ID: 2919 **Organization:** *Not Specified*
Comment ID: 203318 **Organization Type:** Unaffiliated Individual
Representative Quote: Please keep private businesses out of our National Parks by excluding Commercial Dog Walkers from using the GGNRA for business purposes. The large presence of dogs in areas like Fort Funston excluded others from equally using the space and private commercial benefit is not the purpose of the National Park System.

Corr. ID: 3059 **Organization:** Golden Gate National Recreation Area
Comment ID: 201235 **Organization Type:** Unaffiliated Individual
Representative Quote: No commercial dog walking should be allowed inside the National Parks. If an individual owns more than 3 dogs, then s/he should be granted a special permit to walk them all at once. This opportunity should not be extended to for-profit individuals.

Corr. ID: 4322 **Organization:** *Not Specified*
Comment ID: 209452 **Organization Type:** Unaffiliated Individual
Representative Quote: Having watched vanloads of dogs unloaded onto park property, I support whatever means GGNRA needs to control them. To site one location, Baker Beach, I have personally watched vanload after vanload of dogs arrive as paid dog drivers open up their vans and allow unleashed dogs to run onto the beach without any controls. They are not so-called dog "walkers", they are dog drivers - they drive dogs to parks and dump them there.

Corr. ID: 4665 **Organization:** National Parks Conservation Association
Comment ID: 209157 **Organization Type:** Non-Governmental
Representative Quote: The NPS should not permit commercial dog-walking as such a use does not appear to be permissible under law and policy guidelines. Additionally, commercial dog walking (with each walker having up to six dogs) will negatively impact park resources and visitors, will not provide public service or benefit to visitors, and is contrary to guidelines on private, commercial use of national parks.

Corr. ID: 4695 **Organization:** Golden Gate Audubon Society
Comment ID: 264332 **Organization Type:** Conservation/Preservation
Representative Quote: The Park Service should not permit commercial dog walking within the GGNRA. The Park Service may only permit commercial activities that further the park visitors' experiences. Commercial dog walking does not further any person's park experience.

Response: The park will not prohibit 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 ROLAs. Details on Special Use Permits can be found in Appendix F.

Concern ID: 30467
CONCERN STATEMENT: Commenters acknowledge that professional dog walkers are bringing more dogs than they can control to GGNRA and/or these dogs negatively affect visitors or the park through impacts to park resources or through dog waste. Some commenters stated that the draft plan/EIS will cause more commercial dog walkers to use the park, thus affecting the character and overall ambience of those areas.

Representative Quote(s): **Corr. ID:** 2308 **Organization:** *Not Specified*
Comment ID: 200626 **Organization Type:** Unaffiliated Individual
Representative Quote: At Fort Funston and lower Ocean Beach I have seen solitary (professional, I presume) dog-walkers with 14-15 dogs off-leash. Usually the number is over ten dogs per dog-walker. They cannot control all those dogs and they don't watch them closely enough to pick up their feces. Many dog owners feel their dog's poop is "part of nature" so it's okay to leave it on the beach.

Corr. ID: 2314 **Organization:** *Not Specified*
Comment ID: 195287 **Organization Type:** Unaffiliated Individual
Representative Quote: 4. Professional dog walkers, with their large packs of dogs, are something of a plague already in parts of GGNRA. They dominate certain trails in the Presidio, for example, which is not necessarily a bad thing for people who like dogs, but can be unpleasant and even intimidating for non-dog people, or even those who do enjoy dogs in small numbers. The large packs of dogs also have a particularly strong negative impact on wildlife.

Corr. ID: 4282 **Organization:** *Not Specified*
Comment ID: 209051 **Organization Type:** Unaffiliated Individual
Representative Quote: We also hope the ultimate plan will address what Edward Abbey might have called "industrial dog walkers". On volunteer habitat restoration work in the Presidio we sometimes encounter people with 10 or more pooches in tow. Not only are that many dogs in a group intimidating to those who fear dogs, such treatment is unfair and maybe not humane for the dogs themselves. And one can only wonder how dog walkers of large groups deal with dog feces and urine. Packs of dogs must also be unsettling to wildlife, even if leashed.

Corr. ID: 4584 **Organization:** *Not Specified*
Comment ID: 210017 **Organization Type:** Unaffiliated Individual
Representative Quote: The DEIS estimates that over 1000 dogs will be commercially walked within the GGNRA daily (p. 63 p. 276). Commercial dog walkers, with up to six dogs, will negatively impact the experience of park visitors on trails and in other areas of the park. If permitted, commercial dog walking activity will increase within the GGNRA and will displace park visitors, of all legitimate user groups, from areas of the park. Commercial dog walkers will dominate the ROLAs, displacing other park visitors. Commercial dog walking vehicles will occupy parking spaces resulting in fewer spaces available for park visitors. If allowed, commercial dog walking operations will have a dominant presence in some areas of the park thus affecting the overall character and ambiance of those areas.

Corr. ID: 4668 **Organization:** *Not Specified*
Comment ID: 264292 **Organization Type:** Unaffiliated Individual
Representative Quote: Visitors may have few opportunities to avoid direct encounters with off-leash dogs. In addition groups of dogs such as brought by commercial dog walker or that form when various visitors allow their dogs to congregate increase the safety risk due to aggression characteristic of pack walking and the increased likelihood of social and re-directed aggression .

Response:

The park will not prohibit 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 ROLAs. Details on Special Use Permits can be found in Appendix F.

Concern ID: 30470

**CONCERN
STATEMENT:**

Some commenters are under the impression that that draft plan/EIS will ban commercial dog walking at GGNRA and they are against this ban.

Representative Quote(s): **Corr. ID:** 629

Organization: *Not Specified*

Comment ID: 181318 **Organization Type:** Unaffiliated Individual

Representative Quote: Please allow dog walkers to continue doing their jobs, walking up to 8 dogs at a time, on leash. The idea of banning commercial dog walking is completely devastating to me.

Corr. ID: 3197

Organization: *Not Specified*

Comment ID: 203953 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a San Francisco resident of over 50 years. You may have guessed that I am also a senior citizen. You may not have guessed that I am a professional dog walker. My small business means everything to me...it brings me great joy, and enables me to live in this very expensive city. My business is registered and I pay taxes. I handle my dogs responsibly, which involves picking up after them and making sure we do not intrude on other park visitors. I take my dogs to Fort Funston, Crissy Field and occasionally Ocean Beach (where dogs are allowed off leash). Often when I'm caring for these dogs I pick up litter. Most of the litter is left by people. Because of my very small business, I am able to live...I also greatly improve the lives of my clients who could not be dog owners in this city, were it not for me. I have seen others in my profession act irresponsibly and I want to be clear that I do not approve of their behavior. Since it is the wrong-doers who are causing the issues in the first place, why not punish them rather than the rest of us? I deserve the right to conduct my business.

Corr. ID: 3653

Organization: *Not Specified*

Comment ID: 204152 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a professional dog walker in Mill Valley, CA. I often use several of the trails that are under review for changes in dog walking. I have to say that I am daily befuddled at the thought of what I do becoming illegal. Being a professional, I take great pride in the manners that I require of the dogs in my packs, NOT allowing them to pile out of the truck, but leashing each and every one until we are well onto the trail, and then releasing only those who are trustworthy and well trained enough to be polite trail users..Knowing that this is not always going to be the case, I avoid, avoid, avoid whenever possible, and bait my ever hungry canine companions towards me with treats, if necessary, to ensure that their attention in on ME, and not anyone else passing by. We've received many compliments over the years about how it can be done WELL. I provide a very valuable service to my community, and plead with you to not take away the privilege of hiking these precious family pets in Natural places where they can romp and play and spin out their beans so that they can stay happy, healthy and fit, which makes them better citizens all around. As a private individual with three of my own dogs, my heart wrenches at the thought of never being able to go to Muir Beach again. I've lived in Marin for 25 years BECAUSE of the Natural beauty of this place. The restrictions coming down feel as though we are being choked right out of the county. As

far as degradation of the parks via feces and off trail galavanting, there will always be individuals who scoff at their responsibility, but they are the minority. And I would bet that no matter what restrictions come to pass that those same individuals will continue to violate the laws. The VAST majority of us LOVE our parks, and show it by cleaning up after our precious pets, as we do not like to step in poo anymore than anyone else. In fact, my own personal and professional policy is to pick it up if I see it, whether it came from the dogs in my care, or not. If this precious privilege is taken away, not only will my own dogs and I suffer for it, but my business, as well.

Response:

The park will not prohibit 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 ROLAs. Details on Special Use Permits can be found in Appendix F.

Concern ID:
CONCERN
STATEMENT:

30473

Commenters have suggested that commercial dog walkers have time limits (such as only 3 dogs during the summer and 6 dogs at other times) or should schedule their use at the park. Some commenters believed that commercial dog walkers should have a finite number of parking spaces for commercial dog walkers so these businesses will be spread out at the park sites, and they could use a smartphone application and have a cap for commercial dog walking parking spaces at each site.

Representative Quote(s):

Corr. ID: 3095

Organization: Self

Comment ID: 203092 **Organization Type:** Unaffiliated Individual

Representative Quote: (4) limitations for professional dog walkers that are more restrictive during high use periods (summer day times) and less restricted at other times (early mornings, rainy days, winter weekdays, etc.) -- for example allowing only 3 dogs per professional during summer days and 6 dogs per professional at other times (with appropriate permits).

Corr. ID: 4408

Organization: *Not Specified*

Comment ID: 206412 **Organization Type:** Unaffiliated Individual

Representative Quote: These dog walking businesses could also be scheduled to use the facilities that have been created for dogs in San Francisco. If we can have smart phone applications for parking places in San Francisco, we can also reserve spots for commercial dog walkers in dog spaces in San Francisco in some equitable fashion, using the web, and distribute them so they do not all crowd into one space. They would have many choices.

Response:

The park will not have separate parking spaces available for commercial dog walkers nor prohibit 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 ROLAs. The permits will restrict use to specific times both weekdays and weekends. Details on Special Use Permits can be found in Appendix F.

Concern ID:
CONCERN
STATEMENT:

30474

Some commercial dog walkers complained that they cannot control their dogs on leash on trails, and suggested that the trails should be off-leash for the dog walkers' safety. Alternately, some commenters suggested that commercial dog walkers should have their dogs on leash at GGNRA.

Representative Quote(s): **Corr. ID:** 3196 **Organization:** *Not Specified*

Comment ID: 203845 **Organization Type:** Unaffiliated Individual

Representative Quote: Please protect our precious San Francisco ecology by requiring dogs in the park to be on leash and by limiting the number of dogs a single person can bring into the park.

I feel Strongly that commercial dog walkers are abusing our parks. As a frequent visitor to the Presidio, I encounter many groups of six to twelve off-leash dogs in all areas of the park, "led" by dog walkers who in reality have no control over the animals.

Although I love dogs, and have four of my own ranging from 80-100 pounds, it does not seem fair or appropriate for commercial operators to allow their paid-for charges to run rampant in public parks where they threaten native wildlife and plants, as well as adults and children.

At the very least, these commercial operators should be limited to four on-leash dogs (the maximum one person can truly manage) in specific areas of the park. Also, it should be stressed that these pets should be on-leash, not under voice control in most areas. In real life, "voice" is not control, especially when the voice is not the owner of the pet, but a daily or weekly friend. Dog walkers, and possibly their employers, should be held accountable for infringements of park policies. Also, like other park vendors do, dog walkers should have to purchase a license to operate in the park.

These funds could be used to enforce the regulations and maintain the dog-access areas.

Corr. ID: 4119 **Organization:** *Not Specified*

Comment ID: 208520 **Organization Type:** Unaffiliated Individual

Representative Quote: I would like to see ALL "professional" dog walkers with more than three (3) dogs per person be REQUIRED to have the dogs ON LEASH AT ALL TIMES when using the Alta Trail, Oakwood Valley Trail, connected fire roads, etc in this area; or BANNED COMPLETELY!

Response:

No off-leash dog walking would be permitted by any user on trails within the park to protect visitor safety and park resources. Both recreational and commercial dog walkers would have the opportunity to walk up to six dogs on leash and off-leash at selected sites, if a permit is obtained. Permits would be issued for 7 GGNRA ROLAs. Details on Special Use Permits can be found in Appendix F. See chapter 2 for details on Alternative Elements Eliminated from Further Consideration regarding ROLAs on trails.

Concern ID: 30476

**CONCERN
STATEMENT:**

It has been stated that commercial dog walkers are responsible and clean up after their dogs and/or do not pose a problem in or to the park.

Representative Quote(s): **Corr. ID:** 3660 **Organization:** Doggy Rules Kitty Rules
Comment ID: 204588 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a dog walker and I take my dogs to many of the parks in the GGNRA. But I only take one or two dogs at a time. Every dog walker that I see out there is responsible, picking up poop and taking care that their dogs are behaving. In fact, I believe that dog walkers and other animal professionals are the most caring and responsible people out there. I believe that it is random, rogue dog owners who do not train their pets and are most likely also not responsible in picking up their pet's waste or curbing their pet's possible bad behavior.

I don't believe it is the "right thing to do", putting many, many people out of work or in desperate circumstances for their livelihood. Not to mention all of the people (from all over the Bay Area, tourists, etc) and their pets who count on these areas to be open to them and their pets every day.

Why do a handful of irresponsible people have the power to ruin something wonderful many, many responsible, caring people depend on and love? There has to be a better way.

Corr. ID: 3973 **Organization:** Prodog
Comment ID: 206220 **Organization Type:** Unaffiliated Individual
Representative Quote: The professional dog walkers seem to be the only ones aware of the rules, like staying out of the dunes, lagoon and off the main trail while offleash.

I routinely encounter civilians letting their dogs dig for gophers and chase the protected wildlife.

Corr. ID: 3977 **Organization:** *Not Specified*
Comment ID: 207168 **Organization Type:** Unaffiliated Individual
Representative Quote: I primarily use the Alta trail head from Donahue Street in Marin City to walk my two pugs off-leash. I have seen hundreds of dogs which also use this section of the fire road over the 16+ years that I have been a resident here. I have never witnessed anything which might be considered harmful to this environment as it relates to pets and their owners being allowed to exercise untethered. Several dog walkers depend on using this section of the trail for exercising the dogs of their clients. All of them have either kept their dogs on a leash or under good voice control whenever I have come across them.

Please keep This section of the fire road available for off leash use.

Response:

Comments were considered during revision of impact analysis. Please see chapter 4, Visitor Use and Experience for details.

Concern ID: 30477
CONCERN STATEMENT: It has been suggested that a group be created of commercial dog walkers and the government to regulate off-leash dog walking and protect the environment.

Representative Quote(s): **Corr. ID:** 3895 **Organization:** ProDOG
Comment ID: 206416 **Organization Type:** Unaffiliated Individual
Representative Quote: I agree with the DEIS in that dog walkers should be regulated within the GGNRA. But the compliance based management strategy put forth in this document is the wrong way to do it. Dog walking is one of the fastest growing service industries in the country. It should be regulated and assisted by the Federal Government. In these tough economic times, the government has a duty to help maintain and grow any emerging industries to increase employment. The GGNRA and professional dog walkers should be working hand-in-hand to grow the industry, increase jobs, and create a sense of trust between our industry and the government. We should be on the same team.

Therefore, I propose the creation of a Canine Stewardship Core(CSC) to work with the GGNRA Conservancy to regulate off leash dog walking AND protect and beautify the GGNRA. Whatever damage off-leash dog walking allegedly creates within the GGNRA, surely it can be off set by intelligent projects to restore other areas within the GGNRA. I'm proposing free labor from hoards of dog lovers in exchange for access to the historically off leash areas within the GGNRA. Each side need to compromise and bring something to the table and build a relationship for the future based on trust and mutual respect.

Response: The National Park Service is responsible for regulating dog walking, including commercial dog walking, within GGNRA. 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. Permit holders would be required to follow the dog walking regulations for whatever area they use, be it an on-leash area or a ROLA. The permits would be issued for only 7 GGNRA ROLAs. Details on Special Use Permits can be found in Appendix F.

VU5000 – VISITOR USE AND EXPERIENCE: CUMULATIVE IMPACTS

Concern ID: 30463
CONCERN STATEMENT: The proposed alternative will have cumulative impacts on dog owners, particularly at Fort Funston.

Representative Quote(s): **Corr. ID:** 4622 **Organization:** *Not Specified*
Comment ID: 207095 **Organization Type:** Unaffiliated Individual
Representative Quote: Visitor Use & Experience -

The DEIS does not have data to support conclusions of "preferred alternative". This "preferred alternative" will result in major adverse cumulative impacts for myself and many other users of Fort Funston. In that NPS has not performed a site survey at Fort Funston, it is amazing that the

DEIS can support the "preferred alternative" when the user population has never been surveyed.

Response:

A dog walking redistribution survey was developed, completed, analyzed, and incorporated into the impact analysis. Please see chapter 4, Visitor Use and Experience for more details.

WH2010 – WILDLIFE AND WILDLIFE HABITAT: AFFECTED ENVIRONMENT

Concern ID:

30481

CONCERN

STATEMENT:

Dogs chase wildlife in the GGNRA, including shorebirds and rabbits, harass marine mammals, bark, dig into burrows, tear up vegetation important to species, disturb wildlife watchers, and affect the smells of the park for wildlife. The scent of dogs may alert prey to a predator in the area, and can deter wildlife from an area, or may affect soil qualities and olfactory cues for some species. Even if the dogs do not catch the wildlife, they cause wildlife stress, which can lead to less breeding, smaller fat reserves, and other impacts that can lessen survival. Many commenters noted that owners were either oblivious or actively ignoring the rules about wildlife.

Representative Quote(s): **Corr. ID:** 1572

Organization: *Not Specified*

Comment ID: 190780 **Organization Type:** Unaffiliated Individual

Representative Quote: #1) Most sad are dogs chasing wildlife, I have heard that when animals smell dogs they may abandon their nests. Dogs disturbing wild creatures is my biggest concern. I have seen dogs at Stinson Beach chase shorebirds until they cannot fly. Their owners just think it is sport.

Corr. ID: 1681

Organization: *Not Specified*

Comment ID: 200231 **Organization Type:** Unaffiliated Individual

Representative Quote: These are the reasons I believe dog owners need to be accountable for their dogs, and why dogs need to be leashed at Rodeo Beach:

Dogs run right into the lagoon, disturbing and scaring away wildlife - ducks, cormorants, gulls, pelicans, etc. I have even seen people chase their dogs into the lagoon. This really upsets me.

- Dogs run off trail, and onto the plants on the sand dunes, probably stepping on the nests and eggs of wildlife. I don't want to see the majestic Killdeer disappear because its young are being trampled by dogs.

Corr. ID: 2144

Organization: *Not Specified*

Comment ID: 193439 **Organization Type:** Unaffiliated Individual

Representative Quote: Measures of impact of these alternatives on species abundance + diversity should be made on test sites. Published data (ie biology letters - 1977) document 47% reduction in bird diversity along trails used by dogs.

Corr. ID: 3961

Organization: *Not Specified*

Comment ID: 206064 **Organization Type:** Unaffiliated Individual

Representative Quote: Dog feces make the park feel unsanitary, and have an impact on other species, such as butterflies, that are live their lives by

their sense of smell. They change the chemistry of the soil which can effect plant populations.

Corr. ID: 4024

Organization: *Not Specified*

Comment ID: 207012 **Organization Type:** Unaffiliated Individual

Representative Quote: I have witnessed dogs burrowing deep holes behind restricted, fenced areas, run freely in the snowy plover habitat during nesting season, chase seabirds fishing close to shore, as well as audibly disturb the landscape, which may drive wild animals from their habitats. Many dog walkers either do not care about those around them, or cannot control their charges, particularly when they take many canines out at once

Corr. ID: 4215

Organization: San Francisco League of Conservation Voters

Comment ID: 208890 **Organization Type:** Conservation/Preservation

Representative Quote: We were unable to find an analysis of one probable effect of dog activity on mammalian wildlife, either on or off-leash. Most mammals use the production of certain chemicals and their sense of smell to communicate substantial amounts of information. One well known way that canids, whether domestic or wild, communicate is through chemical secretions in urine. The awareness of scent marking in urination is not limited to other members of the genus *Canis*, but is clearly perceived by other mammals as well, be they potential prey like rabbits or other carnivores such as a bobcat. The daily presence (and urination by) tens to hundreds of domestic dogs in areas of natural habitat create a profound stressor on other native mammals, and should be noted in the environmental analysis. An unfortunate brush rabbit finding itself at Fort Funston would "believe" that it had landed in the wolf pack to end all wolf packs.

Corr. ID: 4265

Organization: Kellner and Associates

Comment ID: 209115 **Organization Type:** Unaffiliated Individual

Representative Quote: I have a concern regarding the effect of dogs and people on the behavior of wildlife and use by wildlife of lands of the Golden Gate National Recreation Area. Because of a dog's acute sense of hearing and smell, they are able to search for and encounter wildlife that would ordinarily escape detection by humans. In addition, I have observed many times during my recreational use of open space lands, dogs flushing and otherwise disrupting wildlife behavior. The owners of the dogs are either oblivious or encourage such behavior. Off leash dogs are particularly destructive because they chase wildlife.

In addition to the direct displacement of wildlife, the odor of a dog can deter wildlife from using a particular area thereby reducing the size of the GGNRA available for use by wildlife. Barriers to wildlife movement, by either the physical presence of dogs or the odor of dogs, are particularly detrimental when they they reduce the movement of wildlife from one area to another.

Corr. ID: 4267

Organization: Law Office of David Elliott Wise

Comment ID: 209102 **Organization Type:** Unaffiliated Individual

Representative Quote: Last year I saw an off leash terrier sneak up on a

tern standing at the surf line, near Sloat Blvd. at Ocean Beach. The terrier grabbed the Tern, shook it hard a few times, while the owner watched and ineffectually tried to call the dog off. After several shakes, it dropped the Tern. The bird's wing appeared to be broken, it could not fly, but limped to the water, dragging the broken wing, and then floated about in the surf. I called the Park Police, and about forty five minutes later a Park officer drove by, looking out the window, and kept going.

Corr. ID: 4683

Organization: *Not Specified*

Comment ID: 210190 **Organization Type:** Unaffiliated Individual

Representative Quote: California Quail, jackrabbits and brush rabbits were once common at Fort Funston. Prior to that area being taken by dog owners, they successfully bred there. I recall watching 2 particular visitors encouraging their dogs to chase the rabbits. Both told me the dogs never caught a rabbit and I have no reason not to believe them. What they and many others apparently did do is chase the rabbits and the ground dwelling quail to the point they could no longer successfully breed. The stressful impacts of 2 dogs probably wouldn't do much, but the stress from tens or even hundreds of dogs on a small population certainly would. Those animals no longer inhabit Fort Funston and for that matter the rest of GGNRA in San Francisco. Since all three species survived the period Fort Funston was an active military base and the period it was vacated and a little used parkland, it seems their demise can most likely be attributed to the onslaught of dogs that destroyed their habitat. That in itself should be reason to ban dogs, or at least require leashed access to paved trails only.

Response:

It is agreed that even if direct harassment, injury, or death do not occur, wildlife can still be affected by dogs. The draft plan/SEIS states that dog presence at a site and on-leash dogs would still be able to 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).

Concern ID:
CONCERN
STATEMENT:

30483
Even when dogs chase birds and other wildlife, they rarely, if ever, catch them. Some visitors felt that it was satisfying to watch the dogs playing with the birds on the beach, while others noted that dog owners were quick to stop the behavior if their dog was chasing birds.

Representative Quote(s): **Corr. ID:** 1699 **Organization:** *Not Specified*
Comment ID: 191116 **Organization Type:** Unaffiliated Individual
Representative Quote: Walking every day for 10 years at Mori Point, Montara, and/or Moss Beach, Cliffs at 20 miles per week, I have never had an incident with dogs or birds.

Birders do hate dogs, usually. I however do not hate dogs. I enjoy the noises birds make when they always easily get away from dogs chasing them.

Seems as though we can all get along without new laws, etc.

Corr. ID: 4115 **Organization:** *Not Specified*
Comment ID: 208499 **Organization Type:** Unaffiliated Individual
Representative Quote: We talked about ground-nesting birds, yet raccoons, coyotes, and humans are just as dangerous-more so for the first two-to the birds. All of the animals poop; only the dogs' are picked up and removed. The birds don't appear to be scared of or by 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, frankly.

Corr. ID: 4548 **Organization:** *Not Specified*
Comment ID: 209814 **Organization Type:** Unaffiliated Individual
Representative Quote: During our walks we have seen many dogs chase birds. The birds, in all honesty, seem to be playing with the dogs. I have never see a dog catch a bird. We did see a bird caught in a tree and reported it using the yellow phone in the parking lot. We also seen dogs digging to try and get gophers but we've also seen people grab them and pull them away.

Response: National Park Service regulations (36 CFR 2.2Wildlife Protection), which apply to all 398 units of the National Park Service, state that the following is illegal: "touching, teasing, frightening, or intentional disturbing of wildlife nesting, breeding, or other activities." It is illegal to allow dogs on the beach to 'play' with birds, regardless of intent. As stated in the draft plan/SEIS, 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, 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 (Sime 1999, 8.4). As stated above in Response 30481, an alternative site may not necessarily be preferred habitat or suitable nearby habitat may not be available. 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).

Concern ID:

30484

CONCERN

STATEMENT:

The statement that dogs affect wildlife is unfounded. This assertion should be proven with site-specific examples in the draft plan/EIS. The impacts of dogs need to be compared to the impacts of other user groups. The examples given of incidents with dogs and wildlife do not show a large impact, particularly when compared to other factors.

Representative Quote(s): **Corr. ID:** 2911 **Organization:** *Not Specified*

Comment ID: 202487 **Organization Type:** Unaffiliated Individual

Representative Quote: There is no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife. Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impacts. This indicates that assumptions about impacts from off-leash dogs must be tested and proven to be true before they can be used to justify restrictions. Unfortunately, most of the assumptions cited by the GGNRA have not been adequately tested or proven. In addition, the GGNRA has repeatedly cited research that they claim shows major impacts from off-leash dogs. However, when the raw data from these studies is analyzed, it is clear the claimed conclusions are not supported by the data. This is highly reminiscent of the problems documented at the Point Reyes National Seashore, where claims by staff biologists about negative impacts from an oyster farm located within the park were proven to be baseless when the raw data was independently analyzed.

Corr. ID: 3777 **Organization:** *Not Specified*

Comment ID: 205134 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS fails to note that there is conflicting scientific evidence about the impacts of dogs on birds and vegetation. There is no scientific consensus that restrictions on off-leash dogs are needed to protect wildlife and vegetation. Forrest and Cassidy ST. Clair (2006) and Warren (2007) show that there is little to no impact of off-leash dogs on bird diversity, abundance and feeding. The DEIS needs to test the hypothesis that off-leash dogs are harmful to these sites before it can justify further restrictions.

There is evidence that humans alone and humans with leashed dogs have greater impact on the environment. Knight and Miller (1996, Wildlife

responses to pedestrians and dogs) shows that the flush distance of birds is greater for human or humans with leashed dogs than unleashed dogs. This suggests that the birds in this study view humans as more of a threat than dogs.

Corr. ID: 4015 **Organization:** *Not Specified*

Comment ID: 206825 **Organization Type:** Unaffiliated Individual

Representative Quote: 3) Your proposal seems to place all of the responsibility for impact to wildlife on un-leashed dogs without comprehensive, un-biased studies which point to this conclusion. I am not a scientist, but I do operate in a world where data are included as part of the decision-making process. The few reports you did include point to human impact (snowy plover at crissy field, for example) as having the highest disturbance rate, yet I see nothing in the plan which is aimed at restricting walkers, runners, messy picnickers (whose trash we pick up when walking our dogs) cyclists, skaters...

Corr. ID: 4686 **Organization:** The Marin Humane Society

Comment ID: 227782 **Organization Type:** Non-Governmental

Representative Quote: The draft plan refers to dog-related viruses that can be transmitted through dog feces to marine and terrestrial mammals. The disease examples listed in the draft plan are extremely rare and in fact the diseases spread are even more unlikely without direct physical contact from the infected species. Since the Marin GGNRA lands support a very healthy population of host wildlife species_ the same dangers could also apply to protecting visitor's dogs from disease issues and public safety issues around wildlife (as well as people). We are not aware of any wildlife disease issues in Marin County that have been spread to wildlife from dogs and we would debate this finding.

Response:

As the commenters note, other uses also impact resources at GGNRA, however, this draft plan/SEIS addresses dog management, not other visitor uses, aside from cumulative impacts. The draft plan/SEIS states that "It is important to note 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. However, visitors with dogs could impact natural resources such as wildlife to a greater extent than visitors without dogs."

Very few site-specific, peer-reviewed studies have been conducted at GGNRA for the purpose of documenting impacts to wildlife as a result of dogs. Although not site-specific, many peer-reviewed studies have documented disturbance to wildlife species as a result of domestic dogs. During the past six years, park staff has collected available scientific and technical information on dog management-related topics. Dog-related incidents were recorded at GGNRA using Law Enforcement's (LE's) criminal incident records and were incorporated in the plan/EIS. From 2001 through 2011, a total of 4,940 dog-related incident reports were recorded at

the park, which represents 11 percent of all incident reports during that period at GGNRA. Other types of information collected include dog management policies from other jurisdictions, shorebird data from scientists and organizations that monitor San Francisco Bay Area shorebird populations, and other topics including dog interactions with wildlife, diseases, and waste issues.

A literature review was completed by a contractor outside of NPS to document the impacts that dogs have on wildlife. The review presents a summary of the peer-reviewed literature available for documentation that dogs affect wildlife and documentation that dogs may not affect wildlife. Studies representing both viewpoints are included in the draft plan/SEIS and were used in the impacts analysis for wildlife. In addition, knowledge and direct observations from NPS staff at the sites as well as LE data collected by NPS were also used to determine impacts on wildlife.

When technical and scientific information were not available, per the provisions of 40 CFR 1502.22, the lack of information is clearly noted. These regulations require the disclosure and discussion of information that is incomplete or unavailable, summarizing the existing credible scientific evidence relevant to evaluating the adverse impacts on the human environment, and evaluating these impacts based on theoretical approaches or research methods generally accepted in the scientific community. Section 4.5 of the 2011 DO-12 update requires that, pursuant to NEPA and the National Parks Omnibus Management Act of 1988 (16 U.S.C. 5901 et seq.), NPS management decisions should be based on technical and scientific studies properly considered and appropriate to the decisions made. A reasoned connection between the technical and scientific information was therefore considered in this agency action. As required, the existing credible scientific literature is discussed in detail in chapter 4 and the potential impacts to wildlife were described as a result of this information.

Concern ID:
CONCERN
STATEMENT:

30485

Removing dogs from areas where they previously have disturbed wildlife habitat, particularly nesting birds, would allow for a new place to repopulate, increasing the numbers of wildlife in the area, and may allow for a return of nesting and activity to these sites. This may also allow park visitors to observe wildlife in these areas. There are plenty of places dogs and their owners can go, but the wildlife does not have this choice. Dogs are not part of the natural ecosystem, and should be limited in their access to areas in the GGNRA to lessen their impact on wildlife.

Representative Quote(s): **Corr. ID:** 3087

Organization: *Not Specified*

Comment ID: 201421 **Organization Type:** Unaffiliated Individual

Representative Quote: Pets are important to some families and communities, but dogs are just one animal that is having a significant negative impact on thousands of other animals and plants, and on many other human visitors. Dogs, no matter how loveable, are not a natural part of the GGNRA ecosystem. The parks should be safe and accessible for all users and protect their natural and cultural resources for the future.

Corr. ID: 4132 **Organization:** *Not Specified*
Comment ID: 208564 **Organization Type:** Unaffiliated Individual
Representative Quote: While walking on Ocean Beach I noticed a woman whose dog was running loose. When I informed her that this was a protected area for birds she replied "It's ok. There aren't any cops around."

A man who I informed about the protected area at Ocean Beach said "My dogs never catch the birds so it's ok." He went on to say that he would let his dogs run loose wherever he wants.

Dogs seem to run wild everywhere. Why can't people have some space where we do not have to put up with dogs running wild? On Ocean Beach this would also greatly benefit the birds in the area and we would see more birds when they are not constantly frightened by dogs running after them.

Corr. ID: 4263 **Organization:** *Not Specified*
Comment ID: 209140 **Organization Type:** Unaffiliated Individual
Representative Quote: I support the preferred Alternative to the Muir Beach portion of the GGNRA Dog Management Plan.
The impact of dogs, especially off leash, to wildlife is real. There have been virtually no shorebirds or other marine birds resting on Muir Beach (in the 16 years in which I have lived in Muir Beach) except very early in the morning before dog walkers arrive (very early on Saturdays, especially). Without dogs on the main beach, there is a possibility of actual nesting of some shore species and those which could nest in the front lagoon.

Response:

One of the main objectives stated in the draft plan/SEIS is to 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. The preferred alternative in the draft plan/SEIS for most sites at GGNRA does limit dog walking access. Specifically, the SPPA at Ocean Beach and the WPA at Crissy Field will change from allowing on-leash and off-leash dogs seasonally to not allowing dogs at all to protect the snowy plover and other shorebirds. Dogs will no longer be allowed on the beach north of the Beach Access Trail at Fort Funston to protect the shorebirds and bank swallows, and dogs will be required to be on leash at Muir Beach instead of off leash as currently allowed.

Two of the goals of GGNRA dog management planning are to ensure resource protection while ensuring a variety of visitor uses and experiences throughout the 22 areas addressed by the draft plan/SEIS. Therefore, the preferred alternative allows on-leash dog walking, off-leash dog walking in ROLAs, and no-dog experiences in the sites addressed by the draft plan/SEIS. Areas closed to dogs were chosen specifically to protect wildlife and wildlife habitat, including listed species and critical habitat, as well as to provide areas of the park for visitors who wish to experience the park without dogs. Sensitive areas such as the lagoons at Muir Beach and Rodeo Beach are closed to dogs, some sites have existing or proposed fences to protect wildlife and wildlife habitat, and other sensitive areas such as

beaches that support shorebirds such as the western snowy plover are closed to dog walking.

Concern ID:
CONCERN
STATEMENT:

30486
Other threats to wildlife, such as feral cats, non-native ravens, crows, raccoons, development, hang gliders, park rangers patrolling in vehicles for non-compliance, and recreational vehicles should be removed from the park to protect bird species and other wildlife. Some commenters stated that these factors impact wildlife, not dogs, and that these non-native species are taking over the habitat of native species, and leading to decreased survival. Other commenters noted that while they believe dogs do impact birds and other wildlife, these threats are also significant.

Representative Quote(s): **Corr. ID:** 312 **Organization:** *Not Specified*
Comment ID: 181063 **Organization Type:** Unaffiliated Individual
Representative Quote: Human beings with their noise and intrusive natures create considerably more havoc on the wild life living in these parks than dogs and some of the wild animals such as coyotes and foxes and badgers and raccoons also cause more havoc on the bird life in our parks than dogs.

Corr. ID: 2417 **Organization:** *Not Specified*
Comment ID: 200660 **Organization Type:** Unaffiliated Individual
Representative Quote: The main issue I believe that needs to be addressed when working to protect wildlife is recreational vehicles. In my opinion people who love to use off road motorized vehicles with huge tires and loud engines are the ones who pose the biggest threat to the lives of animals. There are also issues with dogs harassing birds, but I believe that people are the ones who do the most damage.
there should be designated areas that are for leashed dogs and some so dogs can run off leash like there are at Fort Funston. Trails should be well marked and there needs to be places where birds and other wildlife are protected so no humans, dogs or off road vehicles are allowed.

Corr. ID: 2484 **Organization:** American Bird Conservancy
Comment ID: 200813 **Organization Type:** Unaffiliated Individual
Representative Quote: Feral cats must also be removed from the Golden Gate Recreation Area. It must be illegal to establish and feed free roaming cat colonies in parks. Feral cat colonies are fed by caretakers and the feral cats stay in one area because of the food supply. They have decimated quails in the area and are the threat to future generations of birds since they kill fledglings that are still unable to fly.

Wildlife in parks must be protected from *domestic animals* such as cats and dogs.

Corr. ID: 4312 **Organization:** *Not Specified*
Comment ID: 209377 **Organization Type:** Unaffiliated Individual
Representative Quote: While it is true that the length of the Oakwood 'Valley Fire Road being fenced is much shorter than those examples, it will

be a significant barrier for any animal smaller than a deer or coyote. Another adverse environmental impact of the plan as currently formulated will be the additional vehicular traffic by park police performing the surveillance needed to enforce the new restrictions. This added vehicular traffic will have a greater impact than the dogs being walked that they are trying to control.

Corr. ID: 4614

Organization: *Not Specified*

Comment ID: 210138 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS fails to address the effect of the large invasion of the non-native crows/ravens at Fort Funston on the native species of birds and animals. There is not a seagull to be found at Fort Funston. The crows/ravens have invaded the cliff areas, have driven off other birds and appear to eat everything and anything. They show no fear of dogs or humans. The DEIS fails to address the destructive effect these birds are having on the native birds and animals of Fort Funston.

The DEIS fails to discuss the clear lack of understandable notice, in both signage and fences, o habitat protection areas at Fort Funston. It just is not present.

Response:

As the commenters note, natural resources within GGNRA are affected by other factors, however, this draft plan/SEIS addresses dog management, and is not intended to manage the effects of invasive or non-native species although it does acknowledge their presence in the impacts analysis. As an example, the draft plan/SEIS notes that the presence of great horned and barred owls reduces the chance that northern spotted owls (a special-status species) would be present and competition from other owls, corvids (ravens, crows, and jays) or other nest predators may depredate spotted owl nests, thus negatively affecting the northern spotted owl. Also noted in the draft plan/SEIS is the fragmentation of existing habitat and the continued colonization of existing habitat by non-native species which may represent the most important current threats to California red-legged frogs, a special-status species (NPS 2005a). Therefore, although impacts to special-status species at GGNRA as a result of non-native species are acknowledged in the draft plan/SEIS, the park also believes that dogs have a negative impact on wildlife and special-status species as well. NPS has an affirmative obligation to conserve resources, and to not allow uses that would cause unacceptable impacts or impairment. While NPS also addresses non-native species, by nature these aren't 'uses' but rather consequences of uses and other factors. Not only is NPS able to address uses that create impacts, it has an affirmative obligation to do so.

Concern ID:

**CONCERN
STATEMENT:**

30487

Many commenters said that they had never, or rarely seen an incident of dogs chasing wildlife, or disrupting wildlife, but did note extensive human-related stress to wildlife, particularly after events and warm days, when a lot of trash was left. Dogs do not scare wildlife, particularly any more so than many of the user groups in the GGNRA, including hang gliders, surfers, bikers, and nature watchers. In fact, dogs may actually benefit some wildlife, like birds, by scaring away feral cats from the GGNRA, a major predator of birds.

Representative Quote(s): **Corr. ID:** 417 **Organization:** *Not Specified*
Comment ID: 181594 **Organization Type:** Unaffiliated Individual
Representative Quote: As a large proponent of wildlife and habitat preservation, I'm also very unnerved by your claims of "sensitive habitat" as rationale for tighter restrictions. Considering the recent development funded by GGNRA, there seems to be a contradiction. Recent developments at Lands End, Mori Point, and several other parks have ripped up vegetation that has been there for generations (no, not native, but plants that were brought by settlers in the 18th and 19th centuries, which wildlife has adapted to since) in exchange for paved walkways and "quaint" planted areas. From personal experience, I can say that raccoons, foxes, etc... that once were plentiful in the area (never in danger from dogs) have all but disappeared since development commenced

Corr. ID: 2354 **Organization:** *Not Specified*
Comment ID: 195375 **Organization Type:** Unaffiliated Individual
Representative Quote: I have never witnessed anyone's dog chasing snowy plovers or harassing wildlife in any of the GGNRA lands that I have visited. The density of people in the surrounding cities have a far larger impact on wildlife in the GGNRA than does the occasional off-leash dog. Please count this letter as a vote against the Preferred Alternative.

Corr. ID: 4465 **Organization:** *Not Specified*
Comment ID: 264257 **Organization Type:** Unaffiliated Individual
Representative Quote: The DEIS refers to the negative effects of dogs chasing wildlife. The DEIS should be changed to recognize that in this ecosystem historically, there were a variety of predators including dogs assisting humans busily engaged in predator-prey activities

Corr. ID: 4535 **Organization:** *Not Specified*
Comment ID: 209746 **Organization Type:** Unaffiliated Individual
Representative Quote: In over 30 years walking my dogs in the GGNRA, I personally have never seen a dog injure or kill a bird or other mammal. Just the opposite is true--wildlife in an urban environment are used to dogs. We have existed together for years. The Marine Mammal Center has said that they like it when people are walking their dogs on the beach, because we find the injured and stranded marine mammals!

Response: The draft plan/SEIS stresses 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 GGNRA areas. It further states that "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. However, visitors with dogs could impact natural resources such as wildlife to a greater extent than visitors without dogs." This draft plan/SEIS determines that dog presence at a site and on- and off-leash dogs can disturb wildlife (such as shorebirds and marine mammals) and/or cause a flight response through their presence on the beach or other habitats and by chasing, lunging or barking at roosting, resting, and feeding

wildlife.

Concern ID:
CONCERN
STATEMENT:

30489

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. There are few areas for off-leash dog walking, and wildlife in the GGNRA should not be held above the need for recreational space in the GGNRA.

Representative Quote(s): **Corr. ID:** 1594 **Organization:** *Not Specified*

Comment ID: 190824 **Organization Type:** Unaffiliated Individual

Representative Quote: There are 1000 miles of coast in California where native plants and wildlife can thrive. San Francisco is a densely populated area where people need places to exercise their dogs. Compressing the growing dog population into less and less space will only lead to more management issues with this population.

Response:

Two of the goals of GGNRA dog management plan are to ensure resource protection while ensuring a variety of visitor uses and experiences throughout the 22 areas addressed by draft plan/SEIS. Therefore, the preferred alternative would continue to allow on-leash dog walking, off-leash dog walking in ROLAs, and no-dog experiences in many of the sites addressed by the plan. In order to provide more off-leash dog walking area at Fort Funston, the GGNRA site with the highest dog walking use, the preferred alternative in the draft plan/SEIS was modified to expand the upland ROLA. The expanded ROLA would create an off-leash corridor extending from the main parking lot north to and including the north beach access trail. The ROLA would also encompass part of the already disturbed area across from the north beach access trail. Off-leash dog areas - Regulated Off Leash Areas (ROLAs) - are part of the preferred alternative for a number of GGNRA sites to allow visitors the opportunity to have recreational space with their dogs where leashes are not required.

However, GGNRA is also mandated by both the enabling legislation creating the National Park Service and by GGNRA's enabling legislation, as well as the general NPS Management Policies, to protect and preserve resources as well as provide recreational opportunities. For that reason, one of the objectives of the draft plan/SEIS is to "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." Recreational uses do not trump preservation of resources; rather, Congress has directed NPS to provide for recreational opportunities consistent with resource protection, as shown in both GGNRA's enabling legislation and in the Organic Act that established the National Park Service.

WH4000 – WILDLIFE AND WILDLIFE HABITAT: IMPACT OF PROPOSAL AND ALTERNATIVES

Concern ID: 30493
CONCERN STATEMENT: Restrictions on beaches should be tight to protect wildlife, and surveys should be undertaken to make sure that beaches with seasonal wildlife have adequate protection. Commenters felt that off-leash dogs would not provide protection to wildlife. Allowing off-leash dogs in beach ROLAs would have negative impacts, and areas with ROLAs would create areas of potential habitat that would never be inhabited due to the dogs. On-leash restraint of dogs would assure the safety of both wildlife and dogs, as wildlife also poses the threats of parasites and diseases to dogs.

Representative Quote(s): **Corr. ID:** 2190 **Organization:** *Not Specified*
Comment ID: 200585 **Organization Type:** Unaffiliated Individual
Representative Quote: Please do not allow any dogs off leash anywhere in the park. Please impose severe fines and punishments for those who allow there dogs to be off leash. I would very much like going to this space but feel threatened by dogs and aggressive dog owners. I enjoy the wildlife and have witnessed on more than one occasion dogs chasing and killing birds

Corr. ID: 2233 **Organization:** *Not Specified*
Comment ID: 200859 **Organization Type:** Unaffiliated Individual
Representative Quote: The wildlife MUST be given top priority, because they can't protect themselves from us (or from our pets). Dogs and other exotic species do not belong in our parks and other wildlife habitat. At a minimum, they should always be on a short 6 foot leash. But it is preferable to ban them from our national parks.

Corr. ID: 4470 **Organization:** *Not Specified*
Comment ID: 208701 **Organization Type:** Unaffiliated Individual
Representative Quote: The National Parks are one of the last refuges of wildlife. Any area with dogs running without a leash is not safe for wildlife and never will be. This plan will create zones that will never be useable habitat for the wildlife that National Parks are supposed to protect. They will be zones barren of any life except dogs

Corr. ID: 4668 **Organization:** *Not Specified*
Comment ID: 264288 **Organization Type:** Unaffiliated Individual
Representative Quote: Although I accept the general concept of the Preferred Alternatives in allowing some portions of the beach area to be used by dog walkers with off-leash dogs, these sections need to be greatly confined so that most of the beach areas do not have off-leash dogs and birds can avoid the sections of beach disturbed by off-leash dogs.

Corr. ID: 4683 **Organization:** *Not Specified*
Comment ID: 210181 **Organization Type:** Unaffiliated Individual
Representative Quote: Beaches: Beaches are a particular problem since the resource itself is wished clean with tides and storms and impacts are not

to be seen. However there are significant impacts to wildlife that use our beaches. The simplest example is illustrated in the attached photo of the dog chasing Willets on Ocean Beach. From birds as common as Willets and Western Gulls, to the Federally listed Western Snowy Plover, dogs have an incredible impact on birds. For that reason dog use of beaches should be highly restricted. Beach areas known for bird roosting should be off limits to dogs. A practice that would be consistent with NPS regulations would be to ban dogs from all beaches in GGNRA. Since that seems unlikely dogs should be limited to a bare minimum of beach areas. No beach should be entirely open to dogs. A compromise might be to limit dogs to no more than some percentage of any given beach. Given the habitat value of beaches, we would think that limitation should be areas adjacent to parking lots with an outside limit of 30% of the entire beach. That at least would allow space for wildlife. It is important to note that many beaches will have little or no wildlife presence during parts of the year. A survey might be appropriate to determine if a given beach is in fact devoid of wildlife. In that case other criteria might be used to determine what if any dog use might be appropriate.

Response:

Areas closed to dogs have been specifically developed to protect wildlife and wildlife habitat, including on GGNRA beaches. Some sensitive areas, including beaches, have existing or proposed fences to protect wildlife. Other beaches that support shorebirds would be closed to dog walking. One of the objectives stated in the draft plan/SEIS is to protect native wildlife and their habitat (including sensitive species and their habitat, and including federally or state listed, unique, or rare species) from detrimental effects of dog use, including harassment or disturbance by dogs. The preferred alternative in the draft plan/SEIS does limit the access of dogs to GGNRA. Specifically, the SPPA at Ocean Beach and the WPA at Crissy Field will change from allowing dogs on leash and off leash seasonally to not allowing dogs at all to protect the snowy plover and other shorebirds. Dogs will no longer be allowed on the beach at Fort Funston north of the Beach Access Trail to protect shorebirds and dogs will be required to be on leash at Muir Beach instead of off leash, as currently allowed. There will also be increased education, outreach, and enforcement, which will help ensure that dog free areas remain dog free, and visitors to dog use areas comply with dog walking regulations.

It has been suggested by numerous studies that management actions such as enforcing or requiring leash laws can 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). Physically restraining dogs on leash would protect wildlife and reduce chasing, but on-leash dogs would still be able to disturb wildlife (Lafferty 2001b, 323) and/or cause a flight response through their presence and by lunging/barking at roosting, resting, and feeding wildlife. Disease transmission that results from direct contact between dogs and wildlife, especially canids such as coyotes, would also be reduced by a leash requirement but not necessarily eliminated as a result of dog waste removal requirements in this draft plan/SEIS.

Concern ID:
CONCERN
STATEMENT:

30495

Many 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 current protections under alternative A are already protecting wildlife. One measure that would improve this would be to fix up signs and fencing in the park.

Representative Quote(s): **Corr. ID:** 519

Organization: Marin Co Veterinary Medical Association

Comment ID: 181933 **Organization Type:** Unaffiliated Individual

Representative Quote: The wildlife are among my patients as well and I have a deep concern for them and the environment. I don't believe dogs do a significant degree of damage to wildlife and I do think having this huge group of people (dog owners) caring about the beaches is critical.

Corr. ID: 1626

Organization: *Not Specified*

Comment ID: 190933 **Organization Type:** Unaffiliated Individual

Representative Quote: There is no shown benefit to complete exclusion of dogs for shorebird wildlife encouragement, these leashed walking areas should continue even where off leash is precluded.

In all the literatures and preferred analysis I have seen no sufficient basis for thinking dog walking is at all related to the problems with bank swallows.

Corr. ID: 1767

Organization: Peninsula Humane Society & SPCA

Comment ID: 191519 **Organization Type:** Non-Governmental

Representative Quote: Our professional wildlife rehabilitation staff completed a review/analysis of the site and the proposal, and we believe that there is no observable reason related to the protection of native wildlife which would justify denying access to off-leash dogs in the area. If there was impact on wildlife, it happened long ago. Wildlife continuing to use this area are most likely well versed in people, bikes, and dogs and probably avoid the area during the day. The overall area is very large and wildlife have adequate space to avoid people and dogs.

Corr. ID: 3761

Organization: *Not Specified*

Comment ID: 204651 **Organization Type:** Unaffiliated Individual

Representative Quote: I have yet to hear anything that even begins to convince me that their plan will benefit the bay area urban wildlife enough to warrant the drastic changes they propose for dog access to the parklands. Any tour of most of the land in question will reveal wildlife flourishing in proximity to people and their dogs. It is only because wild species are doing well under the present setup that there is any wildlife to protect and manage.

Response:

It is stated in the draft plan/SEIS 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).

As part of the preferred alternative, many sensitive areas have existing or proposed fences to protect wildlife, including the lagoon at Rodeo Beach, the lagoon and fenced dune areas at Muir Beach, and the eastern and western boundary of the Central Beach ROLA at Crissy Field. Fencing to protect the mission blue butterfly habitat would be added on an as-needed basis along the Alta Trail. In addition, new regulatory and interpretive signs would be developed for dog walking areas with consistent design and style that is clear and concise so the public can understand the regulations at each site.

Concern ID:

**CONCERN
STATEMENT:**

30496

Commenters note that if impacts from wildlife are found to be present, dogs should be on-leash, under true voice control, or banned from many areas. There should be areas in the GGNRA that are fenced for off-leash dog walking, and some areas for on-leash dog walking, but the majority of the park should be dog-free to protect wildlife, so that they can feed, rest, and breed unmolested. There are many places where dog owners can recreate, but the wildlife does not have more habitat, and these areas need to be protected.

Representative Quote(s): **Corr. ID:** 1653

Organization: *Not Specified*

Comment ID: 191048 **Organization Type:** Unaffiliated Individual

Representative Quote: I go to Ocean Beach 1-3/4 times a week at various times a day. I've NEVER been there to my recollection with out seeing at least one dog chasing shorebirds, often with the owners watching and doing nothing. Yes, I know this is a minority, but to the migrating birds who need to use their energy to feed, this means that large potential (non-native) predators can interrupt them at any time. The birds are declining as a result. Dogs have other places to go to build community. Frankly, it's not just the

beach. I've heard from parents who don't want dogs in the playgrounds where dogs aren't supposed to be, etc.

The National Parks, wherever they are, are supposed to be protecting special status specie. Threatened species, wherever they area. Birds only have so much habitat. Dogs do have more choices. Let the birds have the little habitat we've left them. Let the dogs play elsewhere.

Corr. ID: 1899 **Organization:** Bay Nature Institute
Comment ID: 200437 **Organization Type:** Unaffiliated Individual
Representative Quote: And given the difficulty of educating and training all dog owners to keep their dogs under voice command and to recognize rare and endangered wildlife, it seems to me that there is a reasonable basis for banning off-leash access in areas that are determined -- by scientific study -- to serve as habitat for wildlife that would be adversely affected by the presence of such domesticated predators... i.e. off-leash dogs. In other areas, where human presence has so degraded habitat that coexistence with sensitive wildlife species is no longer likely or possible, then it seems to me that off-leash dog recreation should be considered, as long as it does not conflict with more passive recreation by other humans.

Corr. ID: 2603 **Organization:** arbor day foundation
Comment ID: 195542 **Organization Type:** Unaffiliated Individual
Representative Quote: There are more than enough places for people to go to enjoy the outdoors. There are also plenty of places for people to allow their dogs to run around. Let's face it, dogs aren't endangered and probably never will be, do they really NEED to be able to run around in a protected wildlife area? NO. This is ridiculous. This place has been set aside for wildlife, ONLY wildlife. We have taken over 95% of what used to be "wild", can't we let the animals have their small chunk of space and leave it at that?

Corr. ID: 2655 **Organization:** *Not Specified*
Comment ID: 195445 **Organization Type:** Unaffiliated Individual
Representative Quote: I am a dog owner and I do like to go to off-leash places where my small dogs can run free. BUT, just as I believe it is my responsibility to clean up after them, I also believe that there should be serious and effective protection of wildlife. So I think that Golden Gate Park should have off-leash areas, but fenced in such a way that the dogs, wildlife, and everyone else is protected.

The off-leash area should be in one that is not environmentally sensitive. And it should be large enough that it will accomodate the needs of pet owners. The rest of the park should be protected from off leash dogs.

Corr. ID: 2819 **Organization:** Sierra Club
Comment ID: 201127 **Organization Type:** Unaffiliated Individual
Representative Quote: Thank you to the National Park Service for working to implement a Dog Management Plan. Please go further with this plan by ensuring the protection of wildlife in the area. This can be done by ensuring that all off-leash areas are enclosed. Such areas should also be

limited to areas without sensitive wildlife. The Park Service should also ensure that rules of the park, particularly those that protect wildlife and people are enforced. Alternative D is the best one, and should be adopted.

Corr. ID: 3734 **Organization:** *Not Specified*
Comment ID: 204230 **Organization Type:** Unaffiliated Individual
Representative Quote: Please protect the wildlife by not allowing unleashed dogs to have full access to GGNRA. It would be my hope that designated areas for dogs can be established in areas that will not adversely impact the wildlife, nor the habitat.

Response: See response to Concern ID 30495 regarding impacts to wildlife from dogs and response to Concern ID 30485 which states that one of the objectives of this draft plan/SEIS is to 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, while allowing a variety of safe, high quality visitor use experiences, including areas where dogs are allowed.

Concern ID: 30497
CONCERN STATEMENT: [Having a fence on the Oakwood Valley trail would negatively impact wildlife by creating a barrier to movement, especially of smaller species.](#)

Representative Quote(s): **Corr. ID:** 4312 **Organization:** *Not Specified*
Comment ID: 209376 **Organization Type:** Unaffiliated Individual
Representative Quote: Another consideration I would like to point out is the fact that the proposed fence that the Plan currently shows being built along the Oakwood Valley Fire Road will in all likelihood have a greater negative impact on the local wildlife than the off-leash dog walking that will be allowed there. Having a Fence there will not allow wildlife to cross from one side of the road to the other, which I am sure it currently does all the time when dogs are not present. In recent years we have become more and more aware of the severe impact that fenced roads have on wildlife and the environment.

Response: Following the review of public comments, the preferred alternative for Oakwood Valley was modified to remove the ROLA on Oakwood Valley Fire Road and allow on-leash dog walking along the Oakwood Valley Fire Road and on the Oakwood Valley Trail from its junction with the Oakwood Valley Fire Road to the Alta Trail. On-leash dog walking on the Alta Trail would be extended to the Morning Sun Trail, thus allowing a connection to Oakwood Valley Trail. On-leash dog walking would provide protection to the sensitive species and habitat located along the trails. A no-dog experience would be provided on the lower portion of the Oakwood Valley Trail, from the trailhead at Tennessee Valley Road to the junction with the Oakwood Valley Fire Road.

Fencing along the Oakwood Valley Fire Road would not be installed because only on-leash dog walking would be allowed at this site, so there would be no need for a fence that would impede the movement of wildlife.

Concern ID: 30499
CONCERN STATEMENT: The proposed plan is a fair and balanced plan, which will protect wildlife from unregulated dog-walking recreation. Even if only a few dogs harass wildlife, these few dogs can have a significant impact. It is reasonable to have off-leash areas limited to protect wildlife.

Representative Quote(s): **Corr. ID:** 2672 **Organization:** *Not Specified*
Comment ID: 195519 **Organization Type:** Unaffiliated Individual
Representative Quote: I wholeheartedly support the GGNRA Draft Dog Management Plan. All dogs should be on-leash or in enclosed areas for their own safety and that of wildlife. Wildlife and their habitats, especially threatened and endangered species, in the GGNRA and greater area is under constant threat and protecting that wildlife must be a high Park Service priority and given sufficient funding.

Corr. ID: 2769 **Organization:** *Not Specified*
Comment ID: 201086 **Organization Type:** Unaffiliated Individual
Representative Quote: I'm writing to support the preferred alternative or stronger. There are so many dogs at the beach that a minority of those dogs are still enough to unnecessarily impact the birds. Even if they're not immediately dropping dead. As you know. Meanwhile the dogs go home and eat undisturbed.

Corr. ID: 2772 **Organization:** Mt. Tamalpais Interpretive Association
Comment ID: 201090 **Organization Type:** Unaffiliated Individual
Representative Quote: Very good proposal fair and balanced. The national parks cannot be considered as private dog runs. Very damaging to wildlife, the environment, and other users.

Response: Comments noted

Concern ID: 30503
CONCERN STATEMENT: If signs indicating areas of wildlife habitat were put up, dog owners would obey these rules. At present, it is hard to know what areas are protected.

Representative Quote(s): **Corr. ID:** 4430 **Organization:** *Not Specified*
Comment ID: 208565 **Organization Type:** Unaffiliated Individual
Representative Quote: Where there are very sensitive wildlife areas, they should be WELL marked. We responsible dog owners are concerned with preserving our natural resources and need a little direction as to where these areas are.

Response: Although areas open and closed to dog walking are now listed on the park's web site and certain areas with particular wildlife concerns are well and specifically signed, the levels of compliance are low. There would be additional education and outreach efforts once a new dog walking regulation for GGNRA is in place. During implementation of the Dog Management Plan, GGNRA would establish a long-term public outreach campaign to help educate and inform the public about the new dog walking

regulations within the site. The park would also develop a comprehensive GGNRA dog walking guide that would be available at visitor centers, contact stations and on the park's web site. Outreach staff would help educate and inform the public about the new dog management regulation. In addition, if funding allows, GGNRA would place ads in community newspapers and dog walking magazines to help inform the dog walking community of the new regulation. New regulatory and interpretive signs would be developed for dog walking areas with consistent design and style that is clear and concise so the public can understand the regulations at each site. If GGNRA sites support protected wildlife, the new signage would describe what species and what areas are protected with text and illustrations to educate the public.

Concern ID:

30505

**CONCERN
STATEMENT:**

Dogs should not be banned at Muir Beach to protect wildlife. Rather, Redwood Creek should be closed, even fenced, and areas where migrating birds nest should be closed on a seasonal basis.

Representative Quote(s): **Corr. ID:** 3152

Organization: *Not Specified*

Comment ID: 203793 **Organization Type:** Unaffiliated Individual

Representative Quote: The data presented in the Draft Plan does not support Alternative D being designated as the Preferred Alternative. The data presented in the Draft Plan only supports Alternative Plan A, the No Action alternative. The data, itself, however, is deeply flawed as is the methodology used in the Draft Plan as regarding Muir Beach. Dogs have been allowed off-leash at Muir Beach for more than 150 years. The Draft Plan does not provide any compelling reason why the National Park Service (NPS) should interfere with this long-standing right of the people of Marin County to let their dogs enjoy the beach. If the Park Service has to take action at Muir Beach, just restrict dogs to being on leash in the parking lot and the boardwalk leading to the beach. Restrict dogs from being in Redwood Creek, and if necessary, build better fences around the lagoon and the dune. And if there times of the year when the presence of dogs threatens the breeding habitat of migrating birds, then just prohibit the presence of dogs during that limited period. You provide no data showing that any significant or permanent damage to the ecosystem has occurred after more than 150 years of dogs running free and no data showing an acceleration of damage in recent years. If the fencing is inadequate to discourage dogs then just fix the fencing. There is no data supporting the conclusion that nutrient addition from dog waste during the last 150 years at Muir Beach has had a "long-term cumulative moderate adverse impact on the soil." If the presence of dogs has not destroyed or damaged any "archeological resources" at Muir Beach in the last 150 years, the desire to protect archeological resources does not justify restricting dogs at Muir Beach. Heal the Bay's Summer Beach Report Card 2010 gives North, Central and South Muir Beaches an A+ for water quality for both dry and wet times of the year. There is no evidence that dogs have permanently damaged the riparian vegetation in the last 150 years. But there is no evidence that this is a problem at Muir Beach. Dogs run free at Muir Beach; Redwood Creek has amphibians and reptiles. If there is a problem, then ban dogs from Redwood Creek, not the beach. What has the affect been on the sea mammal

population? Let me save you the trouble of doing the research—there has been no impact. There is no documentation that dogs have either directly or indirectly affected the coho salmon in Redwood Creek.

Response:

Under the preferred alternative proposed in the draft plan/SEIS, on-leash dog walking would be allowed on the beach, as well as in the parking lot and on the bridge and path leading to the beach. Fencing will be put in along the dunes and the lagoon to protect resources where practical. As stated in the draft plan/SEIS, although Redwood Creek is currently closed to people and dogs, off-leash dogs have frequently been observed in Redwood Creek and Redwood Lagoon (NPS 2008c and appendix G). A post-and-cable fence installed by NPS along lower Redwood Creek and lagoon was intended to discourage visitors from accessing the water; however, it does not physically exclude dogs or visitors from the area. Fencing at Muir Beach is also challenging to maintain due to the dynamic environment at the site and the resulting sand migration. Time of use restrictions, including seasonal restrictions, can be difficult to enforce and are not a preferred management method. This management concept will remain an option for dog management in the future, but time of use restrictions are not included in the preferred alternative for any of the GGNRA sites.

Concern ID:
CONCERN
STATEMENT:

30506
The eastern portion of Crissy Airfield should be off-limits to dogs in order to protect grassland bird species.

Representative Quote(s): **Corr. ID:** 2965 **Organization:** Urban Estuary Network
Comment ID: 203625 **Organization Type:** Unaffiliated Individual
Representative Quote: And in hot weather the tidal channel is always full of mothers with toddlers splashing in the water - probably the only place in S.F. where they can. Those users need shielded from off-leash dogs.

Now that a ROLA is designated for the central part of the Airfield can the eastern portion now be turned over to the marsh? I've never been able to see an outline of the old runways in the grasses there - does anyone? The ROLA would seem to make the pattern even less obvious.

Originally there were plans to have an aeronautical museum with old planes parked around to evoke Crissy's original purpose; those plans never came to fruition and the whole thrust of the Crissy experience now is nature. Time to jettison the Airfield and enlarge the tidal marsh westward.

Certainly the eastern portion of the Airfield should be a no-dog area to protect the grassland birds that are frequently found there in migration.

And of course, enforcement of the leash laws on the Promenade should be 100%, with one dog per person and no commercial dog walking.

Response:

The preferred alternative for Crissy Field allows on-leash dog walking on the western section of the Airfield and a ROLA on the eastern section of the Airfield. The leash restrictions (6 foot leash) on the western portions of the

Airfield would prevent dogs from chasing wildlife, including grassland bird species.

Concern ID:
CONCERN
STATEMENT:

30507

The preferred alternative does not go far enough to protect wildlife. Alternative D is necessary to provide the best protection of wildlife from off-leash dogs and non-compliant owners. Compliance with the rules needs to be higher than 75%.

Representative Quote(s): **Corr. ID:** 2918 **Organization:** *Not Specified*
Comment ID: 203314 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing in regards to the Draft Dog Management Plan/Environmental Impact Statement. I have lived in the San Francisco Bay area for nearly 30 years. During that time, the population of both humans and their pets have greatly increased. I visit Golden Gate National Recreation Area for hiking and birdwatching. I have frequently witnessed dogs chasing shorebirds; gulls, and other species. This disturbance is harmful to the birds, and very disruptive to my recreation.

I write in support of Alternative D: Most Protective Based on Resource Protection and Visitor Safety the least environmentally damaging alternative. Frankly, I think that dogs should be eliminated from all of our federal lands. The problem, of course, is not so much the dogs but their owners. I frequently make polite comments that there is a leash law, that I would prefer that a dog, not jump on my clean pants with its muddy paws, or that having their dog lick my binoculars (yes, this has happened) is not conducive with nature observation and birding. I get a polite response only about 25% of the time, and of these responses often there is absolutely no attempt by the dog owner to regulate their dog's behavior. About 25% of the people do not respond at all, and I often get a rude to extremely rude response such as "shut up -- this is none of your business" (Bolin Ridge, GGNRA, March 2010). My response was that it was indeed my business as I was also there to enjoy OUR public lands and that one of the mandates of the National. Park Service was to protect wildlife, which the dog in question was most definitely disturbing by running several hundred yards off leash at great speed.

Needless to say, considering allowing voice-control, as proposed under Alternative A. at Ocean Beach in the sensitive Snowy Plover area would be completely irresponsible and provision of habitat for this endangered species.

Allowing up to three dogs per commercial dog walker -- or private dog walker -- is absurd. Again, many impacts to the passive (non-dog) user as well as wildlife.

Not only do I endorse Alternative D, but I urge the Park Service to strictly and consistently enforce dog regulations.

Corr. ID: 3269

Organization: Clean Air Now

Comment ID: 202799

Organization Type: Unaffiliated Individual

Representative Quote: Clean Air Now's Board of Directors is concerned with the protection of wildlife and habitat in our national parks. Safe and secure recreation is important for the public's exposure to healthful air, relaxation, and the natural environment. It is the National Parks Service's job to ensure that human activity does not infringe on that critical need in society. All creatures must coexist in balance, and because of this we ask that you implement the EIS's "Alternative D". The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. We are all dog lovers, but we also see the need to properly exercise our dogs without harm to others.

Corr. ID: 3701

Organization: Sierra Club, San Francisco Bay Chapter

Comment ID: 202225

Organization Type: Unaffiliated Individual

Representative Quote: The Sierra Club, San Francisco Bay Chapter urges the GGNRA to reject the Preferred Alternative identified in the above referenced DEIS due to that Alternative's inadequacy in protecting native plant and wildlife species, including listed species, as well as its failure to provide undisturbed national park experiences (nature recreation, education and science) to its visitors due to the impacts of off-leash and leashed dogs.

Instead, we urge you to adopt Alternative D, "Most Protective of Resource" as the alternative most appropriate for implementing a GGNRA Dog Management Plan that protects the parks natural resources and provides appropriate visitor experiences. We also urge you to add a further component to Alternative D. We believe it is essential that ROLAs be delineated by physical boundaries in order for dog walkers to more easily determine the location of these ROLAs and to facilitate enforcement of ROLAs by providing clearly discernible borders.

Response:

One of the main objectives stated in the draft plan/SEIS is to protect native wildlife and their habitat from detrimental effects of dog use, including harassment or disturbance by dogs. Although alternative D was selected as the preferred alternative for only two sites, the preferred alternatives chosen for the remaining sites would also protect wildlife and wildlife habitat. The preferred alternative in the draft plan/SEIS for most sites at GGNRA limits dog walking access, including having fewer off-leash dog areas, and in those off-leash areas that do exist (ROLAs), there will be specific, enforceable guidelines for control of dogs not on leash. Overall in this draft plan/SEIS, off-leash areas proposed in the action alternatives have been limited to protect listed species and sensitive habitat. Where ROLAs are included in the preferred alternative, the ROLAs were specifically sited in areas that have already been disturbed, have low wildlife activity or are developed areas, and were not located in areas of restored habitat or sensitive areas. In addition, areas closed to dogs were chosen specifically to protect wildlife and wildlife habitat, and would also provide no-dog experiences to visitors who prefer to visit the park without the presence of dogs. Implementation of the dog management plan is expected to reduce

impacts to wildlife from encounters with off-leash dogs as has been demonstrated in studies discussed in the Wildlife Section of chapter 4.

The monitoring-based management strategy (MMS) (formerly the compliance-based management strategy) has been revised based on comments received in the public comment period. Changes to the MMS have been made in chapters 2 and 4 of the draft plan/SEIS. Also, see response to Concern ID 29652 for an explanation of the new monitoring-based management strategy that addresses why the percentage trigger has been removed.

Concern ID: 30508
CONCERN STATEMENT: Heavy fines should be enforced for visitors who let their dogs harass wildlife or run off-leash, in order to protect wildlife.

Representative Quote(s): **Corr. ID:** 3411 **Organization:** *Not Specified*
Comment ID: 201398 **Organization Type:** Unaffiliated Individual
Representative Quote: Wildlife's right to survival must trump human's right to witness it!!!

\$5,000 dollar fine and 6 months jail mandatory minimum sentence for any unleashed animal. No plea bargain or suspended sentences.

Algerian Ivy eradication needed. Non-native ice-plant removed and replaced with native species.

Response: One of the objectives stated in the draft plan/SEIS is to protect native wildlife and their habitat from detrimental effects of dog use, including harassment or disturbance by dogs. The preferred alternative in the draft plan/SEIS for most sites at GGNRA limits dog walking access, including having fewer off-leash dog areas, and in those off-leash areas that do exist (ROLAs) specific, enforceable guidelines will be part of the new regulation, requiring control of dogs not on leash. Enforcement policies for the draft plan/SEIS have been added to chapter 2. However, it should be noted that fines for dog walking violations are not determined by the National Park Service. These fines are established in the Federal Magistrate Bail Schedule, which is set by the court system. Fines have been previously increased for repeat offenders. GGNRA will work with the Federal Magistrate to increase fines related to dog walking violations as appropriate in the future.

Concern ID: 30511
CONCERN STATEMENT: If dogs are removed from some areas of the GGNRA where wildlife was previously kept at bay by their presence, it could result in greater use of areas by wildlife. As a result, more conflicts between users of the GGNRA and wildlife may occur, including more incidents between wildlife and human ecosystems. Removing dogs may also increase the feral cat population, which is detrimental to birds.

Representative Quote(s): **Corr. ID:** 753

Organization: *Not Specified*

Comment ID: 185429 **Organization Type:** Unaffiliated Individual

Representative Quote: wildlife adjustment. deer, skunk, raccoons, rats, other rodents, feral cats, cougars, bobcats, coyotes, and even snakes may re-enter current "dog zones" due to less fear of encountering both dogs and humans. these can be represented as signs of a healthier eco-system. however, the reintroduction of wildlife can become an endangerment to park visitors and eventually become a great tragedy and loss for not only park visitors, but also for wildlife. dogs have managed to keep wildlife at "bay" in most areas of highly traffic off leash dog use areas. if the park system elects to close off specific areas to re-habilitate the ecology, wildlife will eventually re-enter these areas and may cause more problems. deer may become a hazard in areas where once there were no signs. deer may cross roads, injure motorists; resulting in fatalities, both in humans and the deer population.

cougars may encroach these new deer populated areas, resulting in more cougar sightings, accidental attacks on humans or pets (primarily small pets and small children), eventually contributing to fish and game obligated to destroy our precious california mountain lion population.

coyotes and bobcats may follow suit and become entangled in an urban wildlife management crisis that is denied in the documentation provided in the nps proposal for eco restoration and management, resulting in even more damage to our current wildlife endangered already from urban sprawl.

Response:

The preferred alternative in the draft plan/SEIS for most sites at GGNRA limits dog walking access, including having fewer off-leash dog areas. Overall in this draft plan/SEIS, off-leash areas proposed in the action alternatives have been limited specifically to protect wildlife species and their habitat at GGNRA. The draft plan/SEIS's monitoring-based management strategy (MMS) will monitor for impacts to resources, as well as visitors, to determine if additional measures should be employed to reduce impacts to resources or visitors.

Concern ID:

30512

CONCERN STATEMENT:

Overall, alternative C provides the best protection of natural areas and wildlife.

Representative Quote(s): **Corr. ID:** 382

Organization: *Not Specified*

Comment ID: 181170 **Organization Type:** Unaffiliated Individual

Representative Quote: As a dog owner and a park user I am in favor overall of alternative "C" in most cases. I feel that dogs should not be able to free run of park lands due to the possible destruction of natural nesting areas, harming of wildlife and unwanted attention to the public.

Response:

Comment noted. One of the objectives stated in the draft plan/SEIS is to protect native wildlife and their habitat from detrimental effects of dog use, including harassment or disturbance by dogs. For many of the sites addressed by the plan, the preferred alternative includes elements from alternative C. This includes limiting dog walking access, including off-leash

dog areas, and providing specific requirements for dogs not on leash.

Concern ID: 30513
CONCERN STATEMENT: Commenters voiced concerns that if dogs continue to be off-leash, they could be attacked by natural predators, with the result being removal or killing of the wildlife, such as coyotes, or mountain lions. Signs about these wild animals may help prevent this.

Representative Quote(s): **Corr. ID:** 219 **Organization:** *Not Specified*
Comment ID: 180685 **Organization Type:** Unaffiliated Individual
Representative Quote: Regardless of decisions made, people will continue to allow their dogs to run off-leash in the less populated areas of the GGNRA. My concern is that when a mountain lion or coyote attacks somebody's dog that the wild animal will be seen as a nuisance and killed. (I've already watched coyotes stalk leashed dogs, so this is just a matter of time.) I'd like to see some sort of safeguard in place for the animals that belong in the parks rather than for those that only visit. Maybe posting warning signs. I don't want to see more signs, but some people don't believe that their dogs are seen as trespassers or moving snacks to local fauna.

Response: The draft plan/SEIS thoroughly discussed the impacts of dogs on native carnivores. It is also possible that native carnivores could injure or kill off-leash dogs. One of the main objectives stated in the draft plan/SEIS is to protect native wildlife and their habitat from detrimental effects of dog use, including harassment or disturbance by dogs. The preferred alternative in the draft plan/SEIS for most sites at GGNRA limits dog walking access, including having fewer off-leash dog areas, and in those off-leash areas that do exist (ROLAs) specific guidelines will be part of the new regulation, requiring control of dogs not on leash. These limits should reduce or completely avoid any interactions between dogs and native carnivores such as coyotes and mountain lions. Additionally, ROLAs were sited in areas with lower habitat value, and generally are in, or near, developed areas, which limits the potential for interaction with the large carnivores such as mountain lions.

WQ4000 – WATER RESOURCES: IMPACT OF PROPOSAL AND ALTERNATIVES

Concern ID: 29543
CONCERN STATEMENT: Commenters believe that dog feces on the beaches would be eliminated by wave action and strong currents and that any fecal water contamination would be due to sewage overflow. Commenters do not believe that beaches with dogs have higher bacteria counts than beaches without dogs based on the SFPUC monitoring reports and Heal the Bay reports.

Representative Quote(s): **Corr. ID:** 23 **Organization:** *Not Specified*
Comment ID: 181456 **Organization Type:** Unaffiliated Individual
Representative Quote: Please allow responsible pet owners to continue to enjoy the area in line with the 1979 Pet Policy. I would take issue with the rationale that is being presented to change the rules from the 1979 Pet Policy:

-Data presented for problems within the existing rules seem extremely low, and do not support any change

-The main problem presented within the data seems to be for off-leash violations, however the problem with dogs present within restricted area are quite low.

-Fecal contamination by dogs at Ocean beach is cited as a rationale for restricting dogs, however due to strong currents and wave action, the only time I can remember any problem with water quality at Ocean Beach is due to sewage overflow.

Corr. ID: 3725 **Organization:** *Not Specified*
Comment ID: 202341 **Organization Type:** Unaffiliated Individual
Representative Quote: THERE IS NO PROOF DOGS ARE CONTAMINATING THE WATER. To the contrary, there is evidence fecal contamination doesn't exist there at all. The SFPUC monitoring San Francisco beaches showed off-leash beaches do not have higher bacterial contamination than beaches where dogs are prohibited.

On May 26, 2011, a front-page story in the San Francisco Chronicle was entitled, "Where Not to Go in the Water at Bay Beaches." The environmental group Heal the Bay annually rates the Bay Area Beaches, among others, and concluded, " Ten Bay Area beach locations received perfect scores and were named to the groups' honor roll, including Ocean Beach at both Balboa Ave. and Sloat Blvd., Crown Memorial St. Beach in Alameda, Montara State Beach, Surfers Beach, and six others in San Mateo County." (p.1,12)

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. Also, all references to the NPS 1999 document that mistakenly referenced a non-existent water quality study have been removed from the draft plan/SEIS.

Concern ID:
CONCERN
STATEMENT:

29544
To keep dog feces out of the oceans there needs to be strict enforcement of dog waste pickup laws.

Representative Quote(s): **Corr. ID:** 3713 **Organization:** *Not Specified*
Comment ID: 202254 **Organization Type:** Unaffiliated Individual
Representative Quote: Dogs/domestic animals on leash in all parks.. along with feces-pickup enforcement

No dogs/domestic animals in critical habitat!

Specified leash-free areas especially with strict feces-pickup enforcement

Dogs need outdoor space to run of course..
meanwhile we Need to keep feces out of ocean!

Response:

At GGNRA as in all NPS areas, it is required by law that people clean up dog fecal matter. Violations have been written for park visitors at GGNRA who have not cleaned up after their dogs, under 36 CFR 2.15 (a) (5), "failing to comply with pet excrement disposal conditions established by the superintendent." Enforcement policies for the draft plan/SEIS have been added to chapter 2. The action alternatives would require all dog walkers to clean up dog waste. The proposed monitoring-management strategy includes focused education and enforcement as the primary management response for noncompliance, and would better achieve the purpose, need, and objectives of the draft plan/SEIS.

Concern ID:

29545

**CONCERN
STATEMENT:**

Commenters agreed that the marsh at Crissy Field had inadequate flushing, and stagnant shallow water. Because of this, some commenters believe that dogs should be on leash at the Crissy Field central beach to avoid water quality issues from dogs running into the marsh. Other commenters believe that the plan does not provide evidence that dogs are responsible for the poor water quality at the site, which is due to this inadequate flushing, runoff, adjacent land use, and the use of the site by recreationalists.

Representative Quote(s): **Corr. ID:** 1850

Organization: *Not Specified*

Comment ID: 192073 **Organization Type:** Unaffiliated Individual

Representative Quote: Currently, the eastern third of Crissy Airfield., which drains into the Crissy Marsh, receives a moderate to high level of use by off-leash dogs and a substantial amount of pet waste."

Comment: The DEIS fails to provide evidence for the attribution of poor water quality in the tidal marsh to pet waste in the eastern portion of the Airfield. The DEIS should remove the sentence regarding pet waste from this section and should address the following factors as more likely sources of poor water quality and low oxygen levels in the tidal marsh:

- Tidal marshes depend on daily tidal surges to reinvigorate the marsh (as explained in graphics near the tidal marsh). The Crissy Field "tidal marsh" does not benefit from the tidal effects because the inlet to the Bay is often closed for long periods of time, due to local conditions and, apparently, to failure by the Park Service to follow recommendations from designers on appropriate size for the marsh (minimum 30 acres versus actual 18 acres built). As a result, the shallow marsh tends to be stagnant and water quality becomes poor.

- The grassy Airfield is flat, covered with a thick coating of grass. After heavy rain the Airfield is characterized by significant amounts of boggy ground and standing water, suggesting it is not draining anywhere. In any case, the Park Service oversaw design and construction of the Airfield in 1997, so why did they have it drain into the marsh?

- The grassy Airfield abuts the marsh on one end, representing less than 20% of the shoreline of the marsh. Along the long edges of the marsh accounting for at least 60% of the shoreline are Mason street on one side and the Golden Gate Promenade on the other side. There are drains (8-10) along the promenade that take runoff into the marsh from the promenade during rain. (I have seen them with water flowing through during a rainstorm.) There are also two culverts on the Mason Street side of the marsh that appear to allow run-off from somewhere up in the Presidio. Contaminants are likely coming from these other sources rather than the Airfield.

- There is vegetation around the marsh and there are significant numbers of birds in the marsh'all of these create material (decaying vegetation and bird "poop") that can directly affect water quality, leading to low oxygen levels if water is stagnant.

Corr. ID: 4396 **Organization:** *Not Specified*
Comment ID: 209570 **Organization Type:** Unaffiliated Individual
Representative Quote: And it is the hikers, bikers, and horses that cause erosion of the sand dunes far more effectively than the the canines due to the sheer size and continuity of their footprints. And it is the lawns and golf courses near the headlands that over-use the water table and pollute it with pesticides. The dog waste which we try to pick up is at least biodegradable.

Corr. ID: 4465 **Organization:** *Not Specified*
Comment ID: 264260 **Organization Type:** Unaffiliated Individual
Representative Quote: The DEIS mischaracterizes the impact of dogs on turbidity based on the other, human and natural activities that have far greater and long lasting effects on turbidity, including: action of winter storms; action of tidal movements on beach and on inlet when inlet open to tidal action; action of children playing; action of windsurfers and equipment; action of GGNRA equipment periodically dredging open inlet.

Response: See Response 29543

Concern ID: 29546
CONCERN STATEMENT: Commenters have stated that removing dogs from a site will not reduce the risk from rabies and the parvovirus because rabies is also common in mammalian wildlife and the parvovirus is endemic and can be transported on shoes and bicycles. Giardia is also endemic in GGNRA waters.

Representative Quote(s): **Corr. ID:** 4601 **Organization:** *Not Specified*
Comment ID: 209936 **Organization Type:** Unaffiliated Individual
Representative Quote: "Water Quality" (pg. 64 of the DMP/EIS) state that dogs may bring rabies and parvovirus into the area. This is clearly true. However - removing the dogs does not reduce the risk! Rabies is more common in mammalian wildlife - including bats, coyotes, foxes, and raccoons than in domestic dogs, who are generally vaccinated. Parvovirus is endemic. It can be transported into an area on the soles of shoes or on bicycle tires. (Consider the experience of the original wolf pack on Ile Royale.) Thus, the statement is misleading with respect to the impact of

dogs on wildlife disease and water quality. Similarly, giardia is already endemic in GGNRA waters.

Response:

It is stated in chapter 4 of the draft plan/SEIS that prohibiting dogs from sites would result in the elimination of dog waste, thereby eliminating the risk to visitors from the presence of dog-related pathogens. It is also agreed and stated that mammalian wildlife can carry rabies, specifically in chapter 4 that "More than 90 percent of all animal rabies cases reported to the Centers for Disease Control and Prevention (CDC) each year occur in wild animals like raccoons, skunks, bats, and foxes (City and County of San Francisco 2010, 1)."

Concern ID:

29547

**CONCERN
STATEMENT:**

Commenters felt that there is no evidence indicating that diseases transmitted by dogs are present in water, or that dog waste changes water nutrient levels. The plan has failed to prove with facts that dogs are contaminating the water at GGNRA, and more data is needed to show such impacts. The negative impacts in the plan from off-leash dogs should be peer reviewed and should be based on specific studies conducted at the park.

Representative Quote(s): **Corr. ID:** 1835 **Organization:** *Not Specified*

Comment ID: 191984 **Organization Type:** Unaffiliated Individual

Representative Quote: Although this time the GGNRA is supporting the agenda with environmental rationalization, the allegations in the report have not been proven and are not peer reviewed. In summary they are as follows:

1) The negative impact of off-leash dogs on the environment of these Bay Area parks due to accelerating erosion, and being destructive to the plants, animals, diversity, and ground water.

2) Off-leash dogs represent a safety hazard to people using these parks.

After attending the Fort Mason Open House I'm convinced that nowhere in the GGNRA proposal are there substantive studies or proof for these allegations against off-leash dogs. In contrast, these allegations are refuted in studies such as those listed at the end of this letter: Reference 2 (Scientific Assessment of Impact of Dogs on Birds, Snowy Plovers, Small Mammals, Wildlife Diversity, Vegetation and Bodies of Water In Urban Recreational Parks of the Bay Area) and Reference 3 (Statistics and Analysis of Safety Issues Associated with Dogs in Bay Area Parks, and Comparison to Reported Incidents Not Involving Dogs).

Corr. ID: 4686 **Organization:** The Marin Humane Society

Comment ID: 227781 **Organization Type:** Non-Governmental

Representative Quote: "Water Quality"- The draft plan is extraordinarily insufficient in fact on this topic. More importantly, we believe it is dramatically inaccurate and misleading. Our organization is highly knowledgeable about disease transmission of dogs, especially rabies, parvo and distemper. There are no known studies to our knowledge that claim that these three diseases survive in water and we strongly believe that this

statement is incorrect and should be removed. Additionally, we question the accuracy of changing water nutrient levels from dogs. We would recommend that the scientific data and reports used to make this statement be supported in the document. The plan refers to turbidity issues from dogs and this statement does raise concerns on potentially negative issues to certain waterways, but again we urge that these assumptions be substantiated by factual documentation and they should be site specific to each location. Many of the water and wetland areas of the Marin sites can dramatically change through the natural seasonal rainfall process which may also be a factor.

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, including disease transmission. 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.

WR2010 – WATER RESOURCES: AFFECTED ENVIRONMENT

Concern ID:

29540

**CONCERN
STATEMENT:**

The draft plan/EIS fails to address the pre-existing sewer lines of San Francisco that discharge into the ocean, the excavation to update these lines and the stabilization of the cliffs at Fort Funston.

For representative quotes, please see Concern 29506 (GR2010), Comment 207082.

Representative Quote(s): **Corr. ID:** 4622

Organization: *Not Specified*

Comment ID: 304957 **Organization Type:** Unaffiliated Individual

Representative Quote: The DEIS fails to address the pre-existing sewer lines of San Francisco and Daly City which go under Fort Funston and discharge into the ocean. The DEIS does not address the effect on the environment of the sewer lines and the huge excavation which was performed in the last year to update these sewer lines and attempt to stabilize the cliffs which had receded 75 feet in the last 30 years due to the effects of nature (not dogs).

Response:

Under cumulative impacts for water quality in chapter 4, the draft plan/SEIS states that potentially adverse impacts could occur from sewage leaks and the deterioration of aging sewer systems.

Many of the sewage systems within the area are known to have deteriorating pipes.

Large leaks of sewage and runoff occurred into the Richardson Bay in 2008 and 2010, and could contribute additional nutrients and microorganisms into the area, potentially adversely impacting the water quality at some sites

in the park. NPS did incorporate additional text in the cumulative impacts section describing the combined sewer system (CSS) of San Francisco; in comparison to large sewage leaks and oil spills, pet waste at GGNRA sites is a small contributing factor to overall water quality in the San Francisco Bay area.

Concern ID:
CONCERN
STATEMENT:

29541
Commenters have reported that they frequently encounter dog waste, dog waste in bags, and dog urine on Ocean Beach, Crissy Field/Beach, and Fort Funston which they believe contributes to water quality issues at the beaches and lagoon at Crissy Field. Other commenters feel that creeks along trails and fish bearing creeks are also susceptible to impacts from dogs, as dogs are not a part of the natural ecosystem.

Representative Quote(s): **Corr. ID:** 959 **Organization:** *Not Specified*
Comment ID: 191592 **Organization Type:** Unaffiliated Individual
Representative Quote: One final note: I hear the the water quality on at least one trail/fire road are in Novato has been seriously degraded due to dogs, off leash, running free and defecating in the creeks.

Corr. ID: 1648 **Organization:** *Not Specified*
Comment ID: 191034 **Organization Type:** Unaffiliated Individual
Representative Quote: Every time I walk on Ocean Beach, Crissy Field/Beach or the Presidio I encounter piles of dog-doo and plastic bags containing (presumably) dog doo. I also see dog guardians allowing their charges to chase shorebirds, which I find cruel.

On the beach at Crissy there must be a great deal of dog pee. That is utterly unappealing for a beach visit. (an pollutes the BAY + LAGOON). I went to Ft. Funston once but will not go back. The place is absolutely gorgeous but it is a reeking dog toilet.

I don't know of any GGNRA place I can visit without encountering dog feces or urine. (The same can be said of the City in general, but this is about the GGNRA)

Corr. ID: 2202 **Organization:** *Not Specified*
Comment ID: 200711 **Organization Type:** Unaffiliated Individual
Representative Quote: Unfortunately dogs aren't really part of the natural ecosystem, and their presence is generally disruptive at best and quite destructive at worst when, for example, dogs go into fish bearing creeks with spawning redds, etc. As a hiker and park user, I would prefer to enjoy nature without dogs on the trails, but do not object to on-leash dogs in appropriate areas i.e., those without sensitive species and habitats

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.

REFERENCES

National Park Service (NPS)

- 2011 Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making. Effective Date: 10/5/2011.

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