



National Park Service  
U.S. Department of the Interior

Golden Gate National  
Recreation Area

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# Golden Gate National Recreation Area Comment Form

## Negotiated Rulemaking Committee Meeting

Date 3/6/2006

See attached

Add me to the Dog Management mailing list

Name: AVRUM SHEPARD

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[Redacted Address]

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3/1/06

At their November 2000 meeting, the GGNRA's Citizen's Advisory Committee proposed rescinding the 1979 Pet Policy without holding public hearings. I voiced an objection to that action and they agreed to hold public hearings before changing that policy. (Superintendent O'Neil was at that meeting.)

The negotiated rulemaking / environmental compliance process is improper and deviates from controlling law to the extent it is set up to create a new policy from scratch in place of conducting the required public input rulemaking process on whether to alter the 1979 Pet Policy. Therefore I and like standing individuals object to the process unless consistent with the following simple three step process.

1. First resolve the key threshold question: Is there is a community consensus on a need for rulemaking change to alter the current off leash policy?
2. If so, is there community consensus as to what the change should be?
3. If there is some proposed change, then what scope of environmental compliance is appropriate for the particular changes?

Absent formal rulemaking change after full public input for a proposed rule as to altering the 1979 Pet Policy the default policy must remain consistent with the 1979 policy and a substitute rulemaking process is invalid.

*Avrum Shepard*

Avrum Shepard  
[REDACTED]  
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