

May 22, 2006

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

SUPERINTENDENT'S OFFICE

Dear Mr. O'Neill:

I have concerns about the composition of the *Negotiated Rulemaking Advisory Committee for Dog Management Regulation at Golden Gate National Recreation Area*. Please include these comments in the public comments for the May 15<sup>th</sup> meeting. Thank you.

**Point 1:**

Marin County has the largest GGNRA acreage by far of the 3 counties that contain its boundaries. Yet out of a Committee of 19 members (where 25 were possible) there are 3 members that can be identified as representing Marin organizations. Using the categories of interests listed in the February 17, 2006 Federal Register, Marin has 1 representative from 'environmental organizations' (Marine Mammal Center); and 2 representatives from 'other park user groups' (Marin Watch, and the Marin County Humane Society). We have no representation in the user category, "organizations and visitors advocating off-leash use."

The basis for the establishment of this Committee as stated in the Federal Register Notice dated June 28, 2005 is to "negotiate and develop a special regulation (proposed rule) for dog management" in the GGNRA. The Federal Register of February 17, 2006 states, "In the final, proposed committee membership, commercial dogwalkers, off-leash dogwalkers, and those opposing off-leash uses are all interest groups who use the park and are noted in the Notice of Intent as interest groups significantly affected by this issue and thus, must be involved in any meaningful discussions". Using the NPS's stated intent and reasoning, the absence of representation of off-leash/voice-control dog-walkers from Marin is an egregious omission. San Francisco has 4 representatives in this user category and Pacifica 1. Marin has none. I have heard the reason for this was an inability by the NPS to find any dog groups in Marin.

There are approximately 20,000 licensed dogs in Marin County; the Marin Humane Society estimates that this is 1/3 of the actual number of dogs in Marin. We have 6 official dog parks, all found easily on the internet and all with contact info. This begs the question: what process did the NPS use to find representation from Marin to represent off-leash/voice-control interests? This is a Committee driven by consensus. At this belated point in the process, how will the NPS assure that off-leash/voice-control interests in Marin have any chance of being adequately addressed and fairly represented?

**Point 2:**

The City of Sausalito applied for membership because as stated in the June 28, 2005 Federal Register, "parties who believe they are likely to be affected significantly by the rule may apply for membership on the Committee."

In Sausalito we have the Bay as our front-yard and the GGNRA as our side-yard and back-yard. We have been walking our dogs at Fort Baker and in the Headlands and at Rodeo Beach for as long as the town has been here. The GGNRA took over management of these lands from the Army and the 1979 Approved Guidelines for Pet Policy (which do not include Fort Baker since it was acquired by the NPS at a later date) reflect this historical use by the residents. In fact, the last paragraph of the 1979 Guidelines states: "There are existing routes to GGNRA from the City of Sausalito which are not readily accessible to residents wanting to hike with their dogs. When future access routes are developed, however, these guidelines will be adjusted to incorporate them".

We are a town of 7000 adults, 500 children and 1300 dogs (license count). Using the 1 to 3 ratio the Marin Humane Society uses for the rest of the County that gives us 3900 dogs. Dogs are an integral part of our community, so requesting membership on a Committee that is all about the management of dogs in our back-yard is practicing due diligence.

Dana Whitson, the City Manager of Sausalito, formally requested a seat for Sausalito on this Committee during the public comment period. Residents of Sausalito sent in a petition during the public comment period requesting a seat on this Committee.

Sausalito was denied membership and told all local government agencies had either been removed or declined membership, so there were to be no local government bodies represented on the Committee. This is not true. Former members of the GGNRA Citizens Advisory Committee were listed under the "local government" interest category in the June 28, 2005 Federal Register list of proposed appointments. Apparently, to accommodate removing the "local government" interest category and retaining representation for the GGNRA CAC on the Committee, they were simply moved to another interest category, "the interests of other park user groups." This is where they appear in the February 17, 2006 Federal Register list of appointments.

Instead of giving Sausalito a seat on the Committee, the NPS offered the County of Marin 2 seats on a Technical Subcommittee that is currently scheduled to meet twice. Proposed membership on the Technical Subcommittee includes 10 Committee members, a representative from the City and County of San Francisco, 2 from the County of Marin, 1 from Fish and Wildlife, and the possibility of others. The Technical Subcommittee's charge is to take the Committee's data need list, wade through information, and come back to the Committee with recommendations. The Technical Subcommittee has no authority to make any decisions, only to offer recommendations to the Committee. I do not know who will be in the 2 seats from Marin, maybe someone from Sausalito who shares the concerns many of us have about a fair and reasonable solution to the issue at hand, maybe not. Either way, we were thrown a bone, and a very small bone at that.

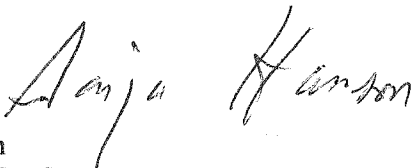
**Point 3:**

At the May 15<sup>th</sup> meeting there was discussion about the database that will be used by the Committee as a tool to reach consensus on decisions made by the Committee. The main element discussed, and the current task for Committee membership is to develop a list of "key interests" in the GGNRA overall and in specific areas of the GGNRA. Where is the representation for Marin in developing this list of key interests, especially off-leash/voice-control interests? Where is the representation for the communities in Marin that border the GGNRA?

I hope this letter makes it clear for the public record, and to the Committee that Marin County has no designated off-leash/voice-control representation on this Committee, nor any representation from Sausalito, a community bound by water and the GGNRA. I am hopeful that there are Committee members who are sympathetic to the concerns of Sausalito residents, and other Marin residents that would like designated areas in the GGNRA in Marin for responsible off-leash/voice-control use. However, support from sympathetic members, who are on the Committee representing other interests, is not enough.

The Charter for this Committee clearly states, "with the participation of knowledgeable and affected parties." When considering representation from Marin, it would have been prudent for the NPS to have followed this directive.

Sincerely,



Sonja Hanson

cc: B. Boxer, L. Woolsey, S. Kinsey, C. McGlashan, D. Whitson, Sausalito City Council, Pacific Sun