



May 25, 2016

**By regulations.gov and U.S. mail**

Ms. Christine Lehnertz  
Superintendent, GGNRA  
Proposed Rule for Dog Management  
Building 201, Fort Mason  
San Francisco, CA 94123

RE: Proposed Rule for Dog Management (RIN-1024-AE16)

Dear Superintendent Lehnertz,

On behalf of Coastside Dog Owners Group of San Mateo County (Coastside DOG), I am pleased to submit the enclosed comments on the Proposed Rule for Dog Management (RIN-1024-AE16) at Golden Gate National Recreation Area (GGNRA).

Coastside DOG of San Mateo County is dedicated to promoting responsible dog walking and advocating for dog-friendly open space on the San Mateo County coast. The group (formerly Montara Dog Group) was initially founded in 2008 in order to celebrate the community's long-standing culture of dog walking and stewardship at Rancho Corral de Tierra—land which many of its members helped save from development and which at that time was owned by Peninsula Open Space Trust. Since 2008, Coastside DOG has placed and maintained pet waste bags and bins throughout Rancho Corral de Tierra. To this day, Coastside DOG provides the only trash removal service at Rancho. Today, Coastside DOG has grown to nearly 500 members spanning from Pacifica to Half Moon Bay, and expanded its mission to include advocating for dog-friendly open space on the entire San Mateo County coast.

**Coastside DOG strongly opposes the National Park Service's proposed rule for dog walking in GGNRA and requests that the Park Service make significant changes to the draft rule based on community input and needs and the GGNRA's recreational mandate. Given the significant changes needed, Coastside DOG is requesting that the Park Service reissue the proposed rule for another round of public comments before it is finalized.**

In its current form, the proposed rule will place a significant hardship on our members and other residents of San Mateo County who have relied on GGNRA lands to walk with their dogs for decades. In San Mateo County, 99% of county and state park trails are off-limits to dog walking.

Out of 190 miles of San Mateo County managed trails, only 10 miles are open to on-leash dog walking. For decades, lands that are now part of San Mateo County GGNRA lands—Mori Point, Sweeney Ridge, Milagra Ridge, and Rancho Corral de Tierra—have filled the important role of providing space where families, seniors, and others can go to recreate with their dogs. Many of our members moved to places such as Pacifica, Montara, Moss Beach, and El Granada because of the available open space to hike and run with one's dog. It is a large part of what makes our communities livable.

When the San Mateo County lands that are now GGNRA were entrusted to the National Park Service, it was with the understanding that the public would continue to have access to the GGNRA. The proposed rule in its current state is a violation of that trust.

As it stands now, the proposed rule will cut on-leash dog walking trails at San Mateo County GGNRA sites by 50-65%. In addition, San Mateo County is the only county that did not get any off-leash areas or trails for people walking with more than three dogs under the proposed rule. The best vista points and loop trails would be off-limits to people walking with their dogs. Vital community access points, such as the trailheads to Sweeney Ridge in Pacifica would be lost requiring people with dogs to drive the eight plus miles to the San Bruno trailhead.

The National Park Service is proposing these extreme restrictions without the data and science to back up their decision-making. Without this information, the proposed rule is arbitrary and capricious. In addition, the proposed rule's severe restrictions to dog walking recreation violates one of the founding principles of the GGNRA—recreation.

On April 5, 2016, Save Our Recreation, SF DOG, Marin DOG, and Coastside DOG filed suit to compel NPS to comply with the Freedom of Information Act (FOIA). We have been seeking access to public records concerning dog-related aspects of the GMP and its associated NEPA review, the DMP and its associated NEPA review, and the proposed Dog Rule and its associated NEPA review since July 2015. Last summer, Mr. Levitt denied our request for an exemption from FOIA processing fees. He said that Save Our Recreation could either administratively appeal the denial of the exemption, or file a new request. He asked that if a new request were filed, that Save Our Recreation narrow its request. Save Our Recreation did just that, sending a new request limiting the public records to those generated after 1999. FOIA required NPS to respond to this narrowed request on or before December 28, 2015. That statutory deadline came and went without a response from NPS. NPS has been and continues to be in violation of FOIA since then, necessitating the FOIA suit filed in April 2016. Despite knowing for months that the parties requested the public records in order to, among other things, inform their comments on the proposed Dog Rule, NPS has insisted that it will not produce any of the electronic documents and e-mails of even a single NPS custodian involved with the proposed Dog Rule until after the expiration of the public comment period on the proposed regulation. The public comment period expires May 25, 2016. NPS's conduct is not only a flagrant violation of FOIA, but it also renders unlawful any final Dog Rule adopted by NPS on separate and independent legal grounds as well.

## **PROPOSED RULE DOES NOT ACCOMPLISH NPS OBJECTIVES**

According to the National Park Service, the purpose of the dog management plan is to promote the six objectives below. The proposed rule fails to meet these NPS objectives and needs significant reworking in order to accomplish these objectives plus provide for recreational opportunities as mandated by GGNRA's enabling legislation.

### ***NPS Objective: Provide a clear, enforceable dog management policy***

As it stands now, the proposed rule will be onerous and extremely expensive for the National Park Service to enforce. Because this highly restrictive rule goes against the San Francisco Bay Area's dog-friendly culture and has overwhelming community opposition, the rule will be extremely difficult to enforce at 22 sites spanning three counties throughout the GGNRA. Making significant changes to the proposed rule so that community buy-in can be obtained is critical to being able to enforce the rule. Without that, the amount of on-the-ground resources needed to enforce the proposed rule will be immense. The Park Service already estimates the enforcement cost will be \$2.6 million annually—money that could be spent on reducing real crime in GGNRA which is of far greater concern than dog walking and dealing with invasive plant species, a real threat to natural resource protection in the GGNRA.

### ***NPS Objective: Preserve and protect natural and cultural resources and natural processes***

As it stands now, the proposed rule will result in alienating neighboring communities which have been long-time stewards of what are now GGNRA lands participating in trail days, trash pickup, and overall monitoring. By closing walkable community trailheads, it will make it so that people with dogs have to get in their cars and drive in search of other places to walk with their dogs—an environmental impact which the Park Service failed to consider. It will displace people and their dogs onto smaller county and city parklands, which could impact resources in these smaller areas—again, impacts that the Park Service failed to study.

### ***NPS Objective: Provide a variety of visitor experiences***

Dog walking is a valid form of recreation in the GGNRA and currently is only allowed on 1% of total GGNRA lands. The proposed rule will cut off-leash dog walking by 90% (in Marin and San Francisco where off-leash is allowed) and cut on-leash dog walking by 50%. Out of the 80,000 acres in the GGNRA, recreational dog walking would only be allowed on 137 acres under this proposed rule. This is not balance.

### ***NPS Objective: Improve visitor and employee safety***

Concentrating people and their dogs into smaller areas will not improve the visitor experience or visitor safety. In addition, many women and seniors feel safer walking with their dogs—a valid safety concern which the Park Service has not adequately considered during the proposed rule development process.

### ***NPS Objective: Reduce user conflicts***

The proposed rule will most likely increase user conflicts (which are now low) because it will concentrate people and their dogs onto fewer trails and open space areas. To reduce conflict, we need to keep our current dog-friendly trails which help spread users out. The Park Service failed

to study the potential conflict implications of the proposed rule.

***NPS Objective: Maintain park resources and values for future generations.***

The proposed rule will result in disconnecting one of the largest and most diverse user groups from GGNRA—a user group that in San Mateo County has been a steward of GGNRA lands for decades. If people do not have access to GGNRA, they are less likely to want to protect it for future generations. In addition, the draft rule fails to protect recreation in this urban recreation area—a value that the Park Service should be protecting for future generations as outlined in GGNRA’s enabling legislation.

**Proposed Rule Not Based on Site-Specific Data or Science**

The proposed rule cites visitor use conflicts as a reason for cutting dog walking trails, but this rationale does not hold up for many sites throughout GGNRA, including the GGNRA sites in San Mateo County.

San Mateo County’s GGNRA sites are all low to moderate visitor use sites with the exception of Mori Point which is classified by the Park Service as moderate visitor use. (\*Note: The Park Service classifies Milagra Ridge as moderate visitor use, which we believe is incorrect based on our members’ low use experiences at the site.) According to the Park Service’s SEIS (p. 353), “visitation to GGNRA is not expected to experience a significant increase in visitation over the next 20 years given the overall visitation trends to the park. Assuming there are no major changes in park boundaries or facilities, park visitation would range between 12.6 million to 15.9 million people annually, similar to how it has been operating over the previous 20 years. Therefore increased visitation to GGNRA should not result in cumulative impacts to GGNRA resources.”

For all of our members who hike with their dogs at sites such as Rancho, Sweeney Ridge, and Milagra Ridge on a daily basis, we know that it is rare to run into other GGNRA users. If we do run into folks, they typically have a dog with them. According to a Park Service visitor use study for Rancho (conducted over a 10 day period from the same vantage point), 58% of users witnessed had a dog with them, a percentage that Coastside DOG believes is low based on our members’ long-time use and stewardship of the site. The Park Service failed to provide any visitor use statistics for Milagra Ridge, Mori Point, and Sweeney Ridge. We estimate from our members’ accounts and personal experience that dog walking easily accounts for more than 60% of visitor use at these sites.

Conflicts in San Mateo County GGNRA sites are extremely rare to non-existent. According to the National Park Service’s dog incident reports for the GGNRA, between 2011-2014 there were only three incidents of dog bites reported in San Mateo County GGNRA. In addition, there were no reported incidents in San Mateo County GGNRA of dogs chasing wildlife during that four-year time period according to NPS incident reports.

In addition, the proposed rule also cites the protection of natural resources as a main reason for cutting on-leash dog walking trails and not providing any off-leash in San Mateo County—a case which the National Park Service has failed to make.

The SEIS on which the proposed rule is based lists the California Red Legged Frog, San Francisco Garter Snake, and Mission Blue Butterfly as the reason for banning people with on-leash dogs from trails at Mori Point, Sweeney Ridge, Milagra Ridge, and Rancho Corral de Tierra. The Park Service has failed to provide any scientific data linking recreational dog walking with impacts on these species.

When one looks at the actual science, it is clear that habitat loss from urbanization, invasive non-native plant species such as French and scotch broom, and aggressive predators such as bullfrogs are the real threat to these species. Highly-respected ecologist and Sausalito resident Dr. David Ainley wrote the following in an April 16, 2016 Marin IJ op-ed, “Where species of lupine required by the [Mission Blue] butterflies now grow along Alta [GGNRA trail in Marin], it has been spreading, though excruciatingly slowly, having nothing to do with dogs but rather the repeated removal of competing broom.”

The Park Service’s own SEIS states that the main reason for lupine decline (Mission Blue Butterfly habitat) is lack of fire and lack of Tule Elk grazing to keep shrubs and trees from taking over.

The SEIS also stated that regarding the San Francisco Garter Snake the “decline of the California red-legged frog (the adult snakes’ primary prey) and the introduction of exotic predators such as bullfrogs into aquatic habitats are both threats to the San Francisco garter snake (USFWS 2002, 24). Habitat loss and the degradation of remaining habitat continue to be the primary threats to the recovery of the San Francisco garter snake (USFWS 2006, 15). Other threats include the increased presence of invasive species (such as bullfrogs mentioned above), water level fluctuations, vehicular strikes (USFWS 2006, 25) and since the Recovery Plan was established, the continued loss of grazing lands, the improper management of suitable habitat and the reduction in prey for the San Francisco garter snake (USFWS 2006, 30). Additionally, the San Francisco garter snake has historically been collected due to its rarity and beautiful coloration, and some amount of illegal collection likely still occurs (USFWS 2006, 20).”

According to the National Wildlife Federation the main threats to the California Red-Legged Frog include:

**“Invasive Species:** Non-native bullfrogs in California are eating many California red-legged frogs.

**Habitat Loss:** Homes, farms and buildings were built on their wetland habitats.

**Overexploitation:** In the 19th and 20th Centuries, they were over harvested for food.

**Overexploitation:** Water resources are overused, depleting frogs of the water habitat they need for homes and breeding.”

*(<https://www.nwf.org/Wildlife/Wildlife-Library/Amphibians-Reptiles-and-Fish/California-Red-Legged-Frog.aspx>)*

There is absolutely no science behind the Park Service's assertion that dog walking is impacting these species. In addition there are easy and effective steps the Park Service could take to ensure that the public does not have access to sensitive habitat areas. For example, at Mori Point the Park Service has fenced off the restored frog ponds. These are the kind of steps the Park Service should be taking to protect both natural resources and public enjoyment of the GGNRA.

### **Failure to Provide Off-Leash Space in San Mateo County**

Unlike Marin and San Francisco counties, San Mateo County did not receive any off-leash areas under the proposed rule. GGNRA manages 6,842 acres in San Mateo County. With all of that space, there is room to accommodate some off-leash dog walking in San Mateo County GGNRA. Providing some legal voice control dog walking areas will ultimately improve compliance with the rule and the visitor experience. If people have designated off-leash trails and open space areas, they will be less likely to break the rules in on-leash areas. (\*Note: Small fenced dog parks do not provide adequate space and recreation opportunities.)

When crafting the proposed rule, the Park Service made the incorrect assumption that people would want to drive right up to any off-leash areas provided (Michael Savidge, NPS Public Meeting in Montara, March 22, 2016). For example when considering Flat Top as an off-leash area in El Granada Rancho, the SEIS states that people would not be willing to hike half a mile with their dog on leash in order to get to the off-leash area. This assumption is not based on any data and based on our experience is incorrect.

In the Montara section of Rancho, the SEIS only considered an off-leash area next to Farallone View elementary school in Montara (an area selected by the Park Service). The Park Service failed to consider historic off-leash areas recommended by our group (then the Montara Dog Group) in the lower area of Rancho due to this incorrect assumption the people want to park next to the off-leash area.

As reported by Peninsula Humane Society & SPCA President, Ken White, in his February 8, 2011 letter to GGNRA: "Our professional wildlife rehabilitation staff completed a review/analysis of the site (Rancho) and the proposal (GGNRA's Dog Management Plan) 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." (\*Please see attached a copy of Ken White's February 8, 2011 letter.)

(\*Note: When the NPS took over Rancho Corral de Tierra in 2011, "Dogs on leash" was then adopted as the existing condition for purposes of the No Action alternative in the SEIS. Given the area's historic use for off-leash, this baseline was incorrect.)

### **Failure to Consider Quality of Life in an Urban Area**

The proposed rule fails to take into account the proposed dog walking restrictions' impact on urban quality of life. Urban quality of life is not just about the built environment. There are many factors that go into urban quality of life including access to outdoor recreation and nature opportunities. These opportunities should be afforded to everyone.

Places such as Rancho and Mori Point are more than just open space areas. They are valuable community spaces where seniors, families, and a diversity of people go with their dogs to walk and to catch up with their neighbors and friends, to practice a healthy recreational activity that should be encouraged, and to connect with nature. If the proposed rule restrictions go through, GGNRA will be gutting the spirit of why the GGNRA was founded.

This negative community impact is not unique to San Mateo County. This community impact is something that is common among all of the 22 areas targeted in GGNRA's dog management plan. Where does GGNRA propose that we all go? Approximately 50% of households in San Francisco have dogs. We would estimate that at least that many households on the San Mateo County coast have dogs. Dogs are a part of our culture, just as they were in 1973 when the park was founded and in 1979 when the 1979 Pet Policy was crafted.

### **Provision for People Walking with More than 3 Dogs**

The proposed rule contains a never-before-seen provision that designates some trails for people walking with 1-3 dogs and other trails for people walking 4-6 dogs—a major change that should have been brought forward earlier in the NEPA process. **San Mateo County is the only county that did not receive any trails for people walking with up to six dogs.** This poorly thought out restriction will place a hardship on people living in our rural coastal communities that may have four or more dogs; on professional dog walkers that use GGNRA lands and on community members who rely on their services; and on people who foster dogs. These residents and small local businesses will be forced to use the few smaller city and county parks in San Mateo County that allow dog walking—displacement that will most likely increase congestion and strain city and county park resources. The Park Service has failed to study this displacement issue.

With 6,842 acres of land in San Mateo County, GGNRA should be able to allocate trails for people walking with 4-6 dogs in San Mateo County. Placing this “burden” on other parks agencies that manage smaller public parklands is simply wrong.

In addition, the NPS permit requirement for non-commercial dog walkers walking with 4-6 dogs is onerous. Bay Area residents walking 4-6 of their own dogs or foster dogs would be required to purchase a permit and would only be able to walk from 8am-5pm Monday-Friday in the GGNRA on the 4-6 dogs designated areas. They would not be able to use GGNRA lands on the weekends. As stated on page 15 of the proposed rule, “All permits would require proof of liability insurance and approved dog-handling training through existing regionally or nationally-accredited training courses offered by organizations approved by the local county jurisdiction in which the activity will occur, and as accepted by the superintendent.” Requiring people to purchase liability insurance who are walking their dogs recreationally would be a financial and logistical hardship. In addition, the accredited dog-handling training courses required by the proposed rule do not exist as confirmed by the Marin Humane Society and San Francisco SPCA. The Park Service needs to go back to the drawing board and to consult and work with these agencies that have decades of experience in dog management.

### **Unattended Dogs Provision**

The proposed rule would prohibit dogs from being left unattended in a parked vehicle or tied up outside a public restroom. While Coastside DOG agrees that people need to be mindful of

temperature increases when leaving one's dog in a parked car, we think this provision in the rule will be difficult to enforce and will present significant issues for GGNRA visitors with dogs. Since dogs are not allowed in GGNRA public restrooms, what will visitors do with their dogs if they need to use the restroom? Restrooms are a basic visitor use feature. People recreating with their dogs should not be prohibited from using GGNRA's restrooms.

### **Monitoring-Based Management Provision**

As written in the proposed rule, we believe that the monitoring-based management provision is a violation of NEPA. Why did we go through an expensive and laborious dog management plan NEPA process, if at the end of the process, GGNRA's superintendent is given the unilateral authority to ban dog walking from areas of GGNRA before impacts occur and without any sort of public input? This provision must be removed from the final rule for dog management in the GGNRA.

### **Trail Names and Proposed Rule Maps Made it Difficult to Comment**

Lastly, in the proposed rule there are a number of issues with the trail names and rule maps which hindered our group's ability and the public's ability to submit comments. Between the SEIS and the proposed rule document, the names of a number of trails and roads were changed which made it more difficult to comment on the proposed rule. In addition, the proposed rule maps fail to identify the trails designated for 1-3 dogs and 4-6 dogs—a critical change which was sprung on the public at the last minute in the proposed rule.

### **Recommended Changes to the Proposed Rule**

In San Mateo County, as throughout the Bay Area, any loss of dog walking areas in the GGNRA will be a hardship for residents. Right now there are numerous trails and beaches in San Mateo County where people can go to have a dog-free experience. It makes it tough to concede even one trail in San Mateo County GGNRA, especially without sound data to back up the decision making behind the proposed rule and in light of the fact that people walking with their dogs are the primary users and in many cases stewards of these lands.

In addition, the lack of sanctioned off-leash areas in San Mateo County GGNRA is untenable. As part of the proposed rule, San Mateo County should be awarded some off-leash space within its GGNRA lands as have been awarded in San Francisco and Marin Counties.

With all of this in mind, Coastside DOG is proposing the following changes to the proposed rule. The goals of these recommended changes are to:

- Ensure that the proposed rule is workable for neighboring communities that have walked their dogs for decades on that lands that are now GGNRA. Community buy-in is critical for enforcement and in ensuring that the neighboring communities continue to play an important stewardship role.
- Keep critical loop trail options for people walking with dogs in order to spread users out on these multi-use trails and to foster the healthy activity of dog walking.
- Provide off-leash dog walking opportunities in San Mateo County GGNRA as have been provided in San Francisco and Marin Counties.

- Continue to protect resources by using signage and fencing when needed to protect sensitive habitat areas rather than complete banning of dogs and people.
- Reduce traffic congestion and reduce the environmental impacts of driving by keeping community trailheads open to people walking with dogs.
- Reduce impacts on smaller city and county parks by adding San Mateo County GGNRA trails for people walking with up to six dogs.

**Coastside DOG of San Mateo County proposes the following changes to the National Park Service’s February 2016 proposed rule:**

**Mori Point – Proposed Rule Map 17**

Expand on-leash trails to also include the following trails which are all currently open to dog walking:

- Mori Headlands Trail
- Mori Bluff Trail –OR- Mori Peak Trail (to provide coastal hiking access)
- Upper Mori Trail
- Timigtac Trail
- The small portion of Polywog Trail from Old Mori Trail to intersection with Upper Mori Trail

***Voice Control Dog Walking at Sharp Park Beach:*** We encourage the Park Service to work with the City of Pacifica before the proposed rule is finalized in order to provide off-leash dog walking at Sharp Park Beach where the National Park Service manages a 0.2 acre area. The proposed rule states, “There are two scenarios under which dog walking opportunities may be expanded under the proposed rule. First if the state and local entities with land management authority for Sharp Park Beach in San Mateo County decide to change dog walking uses at Sharp Park Beach, a 0.2 acre area in the southwest corner of the beach that is administered by the NPS may also be designated by the superintendent.” Before the dog management plan is finalized, the Park Service should be proactively working with the city to secure voice control dog walking at Sharp Park Beach.

Making these changes would ensure that seniors and less physically fit walkers with dogs are able to access GGNRA, would relieve congestion by providing loop options, would ensure community access thereby reducing driving to other trailheads, and would provide off-leash equity by giving San Mateo County some off-leash space. By giving people legal off-leash, people will be more likely to obey the leash laws in other areas of San Mateo County GGNRA.

**Milagra Ridge – Map 18**

Expand on-leash trails to include the following trails which are all currently open to dog walking:

- All paved roads/trails including the paved Milagra Summit Trail
- The Milagra Ridge Spur Trail (from Milagra Ridge Road by the restrooms to the Milagra Ridge Trail)
- The Milagra Ridge Trail (from the Milagra Ridge Spur Trail to the northern section of Milagra Ridge Road)

Keeping these trails open to on-leash dog walking would provide loop options for people walking with dogs on Milagra Ridge. The sections of the Spur Trail and Milagra Ridge Trail proposed above are fairly wide. In addition, the section of the Milagra Ridge Trail mentioned above already has fencing to protect vegetation.

### **Sweeney Ridge/Cattle Hill – Proposed Rule Map 19**

Requested Proposed Rule Changes:

Expand on-leash trails to include the following trails which are all currently open to dog walking:

- The entire Banquiano Trail
- The Mori Ridge Trail
- The paved trail between the Mori Ridge Trail to the Nike missile site and any other paved trails.

Keeping the Banquiano and Mori Ridge trails open to people walking with dogs would ensure that people have access to Sweeney Ridge from Pacifica without having to drive the 8+ miles to the San Bruno trailhead, which under the current draft of the proposed rule would be the only option. The paved trail between the Mori Ridge Trail and the Nike missile site should be kept open to on-leash dog walking.

### **Rancho Corral de Tierra – Proposed Rule Map 20**

#### **Rancho - Montara Section**

Requested Proposed Rule Changes:

- Keep dog walking on the trail heading east from the 2<sup>nd</sup> and Farallone street parking lot towards Farallone View School. The trail turns north at the school fence and connects to the Corona-Pedro trail, as well as the connecting Third Street portal trail which should also be open to on-leash dog walking. The Park Service is proposing to completely close this major trail route to all users, which will take away a much needed loop option in Rancho and will close off community access from Third Street. It is critical to the visitor experience at Rancho to keep this main trail open.
- Designate at least one off-leash trail loop in the lower section of Rancho in Montara. Possible options include the Corona Pedro Trail to Le Conte Trail to Farallone Trail loop –OR- Old San Pedro Mountain Road to the Le Conte Trail to the Corona Pedro Trail.
- Work with Coastside DOG and the community to identify a suitable off-leash space in the lower section of Rancho in Montara. This space has historically been used as off-leash space for decades.
- Keep “social trails” as defined by the Park Service and all community connector trails available for public use, including dog walking. There is no data to indicate that keeping

these trails open will impact natural resources or wildlife. In fact, there is scientific evidence that keeping these trails open will help keep out non-native grasses.

### **Rancho - El Granada Section**

Requested Proposed Rule Changes:

- Provide at least one off-leash trail loop in the El Granada section of Rancho.
- Provide off-leash dog walking opportunities at Flat Top

### **Other Requested Proposed Rule Changes**

- Designate trails for people walking with up to six dogs in San Mateo County GGNRA.
- Remove the permit and liability insurance requirement for people who are recreating in the GGNRA (people who are not professional dog walkers). The permitting and insurance requirement for anyone walking in the GGNRA with 4-6 dogs is an extreme financial and logistical hardship. Provisions for commercial dog walkers and private citizens recreating in GGNRA should be considered separately.
- Remove the time restrictions for people walking with 4-6 dogs in the GGNRA. This restriction will displace people with 4-6 dogs onto smaller city and county parks in the evenings and on weekends. GGNRA has large swaths of land that can more easily accommodate larger groups of dogs.
- Support dog walking recreation by improving signage and providing trash cans.
- Enact a program similar to the City of Boulder’s “Green Tag Program,” requiring dog walkers to complete a training if they would like to walk their dogs off-leash in the GGNRA. Such a program would make enforcement of the rules much easier and acceptable than hiring an army of enforcement rangers.
- Remove the proposed rule’s monitoring-based management provision. GGNRA’s Superintendent should not be able to unilaterally ban dog walking once the proposed rule has been finalized. There needs to be a public process for any future proposed changes.

### **Conclusion**

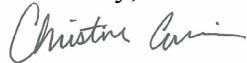
When Golden Gate National Recreation Area was established by Congress in 1972, it was with the understanding that the lands would be managed for the recreational needs of our urban population, which includes the healthy recreational activity of dog walking. The fact is that GGNRA is not a destination national park such as Yellowstone, Yosemite, or the Grand Canyon—it is an urban national recreation area that needs to be managed for both recreation and natural values. As described in GGNRA’s enabling legislation, GGNRA was established “to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties [now also San Mateo County], 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...”

Throughout the NEPA process, the Park Service has ignored overwhelming opposition to its plan for dog management in the GGNRA. Despite thousands of public comments opposing this ill-conceived, highly-restrictive plan and opposition and concerns expressed by Marin, San Francisco, and San Mateo counties and other elected officials, the National Park Service appears to be moving forward with its own agenda for dog management in the GGNRA.

At this time, we hope the National Park Service will make the significant changes to the draft rule needed to ensure that the GGNRA continues to be accessible to Bay Area communities and diverse residents who have relied on this space for healthy dog walking recreation for decades.

Thank you for your consideration of our comments.

Sincerely,



Christine Corwin  
President, Coastside DOG of San Mateo County

cc: Honorable Sally Jewell, Secretary of the Interior  
Jonathan Jarvis, National Park Service Director  
Congresswoman Jackie Speier  
Congresswoman Nancy Pelosi  
Congressman Jared Huffman  
Senator Diane Feinstein  
Senator Barbara Boxer  
Supervisor Don Horsley, San Mateo County  
Supervisor Warren Slocum, San Mateo County



## Peninsula Humane Society & SPCA

February 8, 2011

Frank Dean, General Superintendent  
Golden Gate National Recreation Area  
Building 201, Fort Mason  
San Francisco, CA 94123-0022

Mr. Dean,

We are writing to offer our reaction to the GGNRA Dog Management /Environmental Impact Statement (DMP-EIS) plan to exclude all dogs from "New Lands" which would apply to Rancho Corral de Tierra property near Montara.

The Peninsula Humane Society & SPCA (PHS/SPCA) respectfully asks that GGNRA considers allowing off-leash play in the relatively small areas (of Rancho Corral de Tierra's total acreage) which have been used this way informally, but responsibly, for years.

Our position was reached with careful consideration, given that we are an advocate for dogs (and off-leash play) and local wildlife. While PHS/SPCA is a private, independent non-profit best known for sheltering San Mateo County's stray or unwanted domestic animals and finding new homes, we also provide wildlife rehabilitation for sick, injured and orphaned animals from San Francisco through Santa Clara County.

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.

We should add that we are San Mateo County's contracted provider of animal control work which includes enforcement of the leash law and response to dog bites and attacks. We cannot recall receiving complaints about off-leash dogs or dogs acting aggressively in these areas, which indicates dog owners are being responsible and that the larger area has supported multiple uses peacefully for years.

Please reconsider your plan to ban dogs and off-leash dog play from the small areas of Rancho Corral de Tierra which have informally allowed this use for years with no negative impacts.

Sincerely,

Ken White, President  
Peninsula Humane Society & SPCA  
12 Airport Blvd.  
San Mateo, CA 94401