

The Golden Gate National Recreation Area (GGNRA) released a Supplemental Draft Environmental Impact Statement for Dog Management (SEIS) in September 2013. This SEIS identifies proposed alternative plans for where dogs may be allowed in the recreation areas in Marin, San Francisco and San Mateo counties for generations to come.

The GGNRA has identified alternatives for 22 areas under consideration on GGNRA lands and their recommended (or “preferred”) alternative for managing dog walking is quite restrictive. We need you to comment on this document by February 18, 2014.

General Comments on the Supplemental EIS:

- GGNRA was created by an act of Congress in 1972 to allow for urban recreation and open space in the greater San Francisco Bay metropolitan area - and with the continued development of this major urban area, this need for readily accessible recreation is even more important now than it was in 1972.
- This is a recreation area, not a national park like the Great Smoky Mountains, Glacier or Zion National parks. The GGNRA was built and designed for dog walking from its inception, to better the quality of life of metropolitan residents by making dog walking a well-established priority. Congressional reports referred to dog walking specifically as one of the uses for the space when the GGNRA was created.
- The GGNRA’s current plan, however, would seriously restrict dog walking: only 7 of the 22 areas in the supplemental EIS allow off-leash dog walking access on GGNRA lands in ALL three counties.
- This management plan allows even more restrictions in the future, but won’t allow for new areas to be opened up to dog walking (either on- or off-leash).
- This is an unequal process, and will only result in further restrictions on future recreational dog use.

- There isn't good reason or factual basis to restrict dog walking in this way, and other, better alternatives exist.
- Unfortunately the studies and information the GGNRA is relying on in its latest supplemental environmental impact statement are outdated – it hasn't updated the enforcement data since the last draft EIS was released.
- A significant number of comments submitted for the GGNRA's Draft EIS in 2011 were not considered or addressed in the GGNRA's Supplemental EIS.
- This SEIS also makes inconsistent assumptions -- it assumes there will be 100% compliance in analyzing environmental impacts of its preferred plan, but reserves the right to restrict further dog walking if there are unspecified "violations" or "impacts" found in the future.
- Many assumptions are not documented, and the SEIS has failed to respond to all comments submitted by the US EPA, which found the last draft insufficient in its analysis.
- The GGNRA hasn't studied the implications of how their proposed restrictions will affect adjacent city neighborhoods, communities or residential areas right next door to the GGNRA (concerns like parking, driving patterns, or congestion).
 - Concentrating off-leash dog walking in areas like Fort Funston and Rodeo Beach could adversely affect these communities through increases in traffic.
 - Allowing more off-leash areas throughout the GGNRA would ease these negative impacts, and allow recreational access equally to Bay Area residents.
 - Create an unnecessary financial burden on the City of San Francisco's Parks and Recreation Department by increasing their maintenance costs due to a larger number of dogs in City parks
- Instead, the GGNRA should institute a dog "green tag" system -- which certifies dogs and their owners to use the area. Irresponsible dog owners could have their privileges suspended, instead of all people losing access to a particular dogwalking area.

- A community forum or roundtable should be set up to evaluate management going forward, including dog walkers and other GGNRA users.
- We urge the GGNRA to take a balanced, fact-based approach to its environmental analysis that will result in the preservation of important dog walking recreation in the GGRNA for generations to come.

San Mateo County

The Supplemental EIS does not allow for any off leash areas on GGNRA lands in San Mateo. There isn't any clear factual basis for not allowing off-leash dog walking in areas such as Mori Point, Milgara Ridge, Sweeny Ridge and Rancho de Tierra.

The GGNRA continues to misidentify the baseline or status quo of Rancho de Tierra as an on-leash dog walking area when in fact there has been fact off-leash dog walking at Rancho for decades. The GGNRA needs to correctly establish off-leash dog walking as the baseline at Rancho and then begin to evaluate the range of alternatives based upon careful analysis and review of accurate impacts in this area.