

“PRESERVE RECREATION FOR DOGS AND PEOPLE IN THE GGNRA”

San Mateo County Specific Suggestions & Comments

Public Comment on 2011 GGNRA DEIS

Prepared by: Arnita Bowman

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Overview

This is my public comment related specifically to San Mateo County for the 2011 GGNRA Draft Dog Management Plan. This document includes site specific analysis and suggestions for each on the San Mateo County sites plus general analysis and suggestions. **I am opposed to ALL of the DEIS “ACTION alternatives” that would reduce or eliminate dog recreation at any site and any compliance rules that could ban dogs based on regulatory violations alone and not require public comment.**

We, GGNRA dog people, are living the National Park Service’s Healthy Parks Healthy People US philosophy which First Lady Michelle Obama's emphasizes in her "Let's Move" initiative. The Park Service in their own words emphasizes why active, moving dog recreation is so critical to the Bay Area’s health and well-being. I fully agree with the Park Service statement: “The fundamental value of nature as integral to our health as a species is one of the precepts underlying the establishment of the national park system. As Director Jarvis pointed out in a recent speech at the Harvard School of Public Health, the connections between personal health and parks have been evident since public parks were conceived in the 17th century. A growing body of research has documented the significant health benefits of time spent in nature and exercising outdoors. While certainly not a panacea, parks have the potential to play a major role in addressing the nation's current health crisis reflected in the alarming increase in heart disease, diabetes, and obesity.”

With the DEIS, the Park Service is ignoring the benefits of dogs encouraging people (including local families, seniors and minorities) to get out twice a day in the parks with our canine companions. Instead of demonizing our family dogs, the Park Service should be commending the Bay Area dog people and using them as a role model for other communities on how to encourage healthy, active living and getting out daily for long walks in the park and connecting with nature and our community.

Certainly the long trails in San Mateo County are well suited to daily exercise. However, San Mateo County has been denied voice control options in traditional off-leash recreation areas without any environmental impact study to evaluate the effects on public health and safety. Both San Francisco and Marin have proven that voice-control dog recreation is safe and healthy for an urban population, and San Mateo County should be provide the same privileges in our local urban recreation areas instead of having to drive to San Francisco or Alameda county to legally enjoy this daily recreational activity. In addition, providing legal voice-control areas would reduce the unnecessary citations and law enforcement efforts and more equally disperse the high visitation at Fort Funston and Stern Grove caused by San Mateo County residents.

Note that San Mateo County GGNRA sites are not normally crowded and have high visibility for approaching pedestrians, equestrians, and bicyclists; this enables easier management of voice-control dogs and minimizes any potential conflicts.

In summary my suggestions is to honor the “1979 Pet Policy” and add additional voice-control areas for lands added after 1979. The revised policy needs to be formally incorporate into the NPS regulations and illuminate any question about it’s acceptability. In addition, I specifically suggest:

- Encourage people to walk with their dogs and get healthy and safe exercise and enjoyment
- Eliminate the compliance-based management strategy

- Regulate professional dog walking using best practice guidance provided by entities such as the SFSPCA and Marin Humane Society and local dog walking regulations
- Provide voice-control dog walking options in San Mateo County sites and new lands
- Improve safety measures such as poison oak removal on trail beds, signage, etc.
- Improve feces collection with signage, bags, and an awareness campaign
- Monitor Park Service success in regards to the recreational value and to sound land use management
- Provide awareness/training programs in conjunction with organizations such as the humane societies to improve both recreation and safety

The Park Service Should Encourage Not Discourage Responsible Walking with Dogs

The relatively high illegal voice-control dog walking in San Mateo County GGNRA sites and the high usage of Fort Funston by San Mateo residents is representative of the high desire for such recreational opportunities in the county. Instead of trying to suppress responsible on-leash and voice-control dog walking, the Park Service should embrace it as a way to encourage healthy exercise, community building, and responsible dog ownership. Instead of spending money on increased law enforcement and litigation that is alienating a large group of people that love the outdoors and nature and will discourage visitors with dogs, the Park Service should become the national leader in studying the true impact of dog recreation on nature and on other park users and how to best manage the adverse impacts and maximize the benefits, particularly the public health and safety benefits. As the only park in the National Park System that allows any dog recreation, other than hunting with dogs, the GGNRA is uniquely positioned to provide a great service to the US and the world in providing real insights on the impacts and management of dog recreation. I believe this DEIS process represents a unique opportunity for the Park Service to demonstrate that they are indeed listening to the public comments and to build a stronger relationship with the community.

The Compliance-Based Management Strategy Must Go

A dog management plan should not come with a built-in nuclear option, which is what this is. It immediately undermines any belief that the Park Service is working with the public to design programs that meet the needs of the public and instead gives the Park Service a heavy-handed way to exclude the public without due process. It would allow even a few bad players to be used to destroy our traditional recreational use of the area. 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.

Consolidated Suggested Balanced Dog Recreation Plan for San Mateo County

Park Unit	Voice Control	On Leash	No Dogs
Mori Point	All other trails	On the trails surrounding the frog ponds and along city traffic routes	<p>None</p> <p>Nearby San Pedro Valley Park does not allow any dogs.</p> <p>The adjacent Sharp Park and Rockaway Beach trails all have a high concentration of voice control dogs and all these areas have traditionally been under voice control. So it would be difficult for someone to get a no dog experience even if these trails were designated as no dog.</p>
Milagra	None, except consider a two hour morning and two hour evening time window to meet the needs of local residents	All on-leash	<p>None</p> <p>Notch Trail, Sawyer Camp Trail and San Bruno Mountain are all in the nearby area and do not allow dogs.</p> <p>The park trail system criss-cross and there is little advantage to designating no dog trails as dog would still be nearby and crossing a fearful person's path.</p>
Sweeney Ridge	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	<p>Notch Trail</p> <p>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.</p> <p>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</p>

Park Unit	Voice Control	On Leash	No Dogs
eliminated.			in the park.
<p><i>New lands – e.g., Rancho Corral de Tierra</i></p>			
<p><i>Provide dog recreation based on traditional usage, recreational demand and sound land management practices that achieve the GGNRA mandate. In addition to providing voice control, also provide designated recreational play areas, if feasible, to allow for fetch and other dog sports</i></p>			
<p><i>Note almost all the open spaces on the coast do not currently allow dogs and, if they do, the dogs must be on leash. This increases the need for the GGNRA to provide voice-control and dog play areas for dog recreation.</i></p>			
<p><i>Pedro Point</i> <i>I am not as familiar with Pedro Point and the local needs so my suggestion is tentative and purely based on trying to provide balanced areas for voice-control, no dogs, and leashed dogs.</i></p>	<p><i>None</i></p>	<p><i>Any connecting routes through the park</i></p>	<p><i>Most of Pedro Point except as defined</i></p>

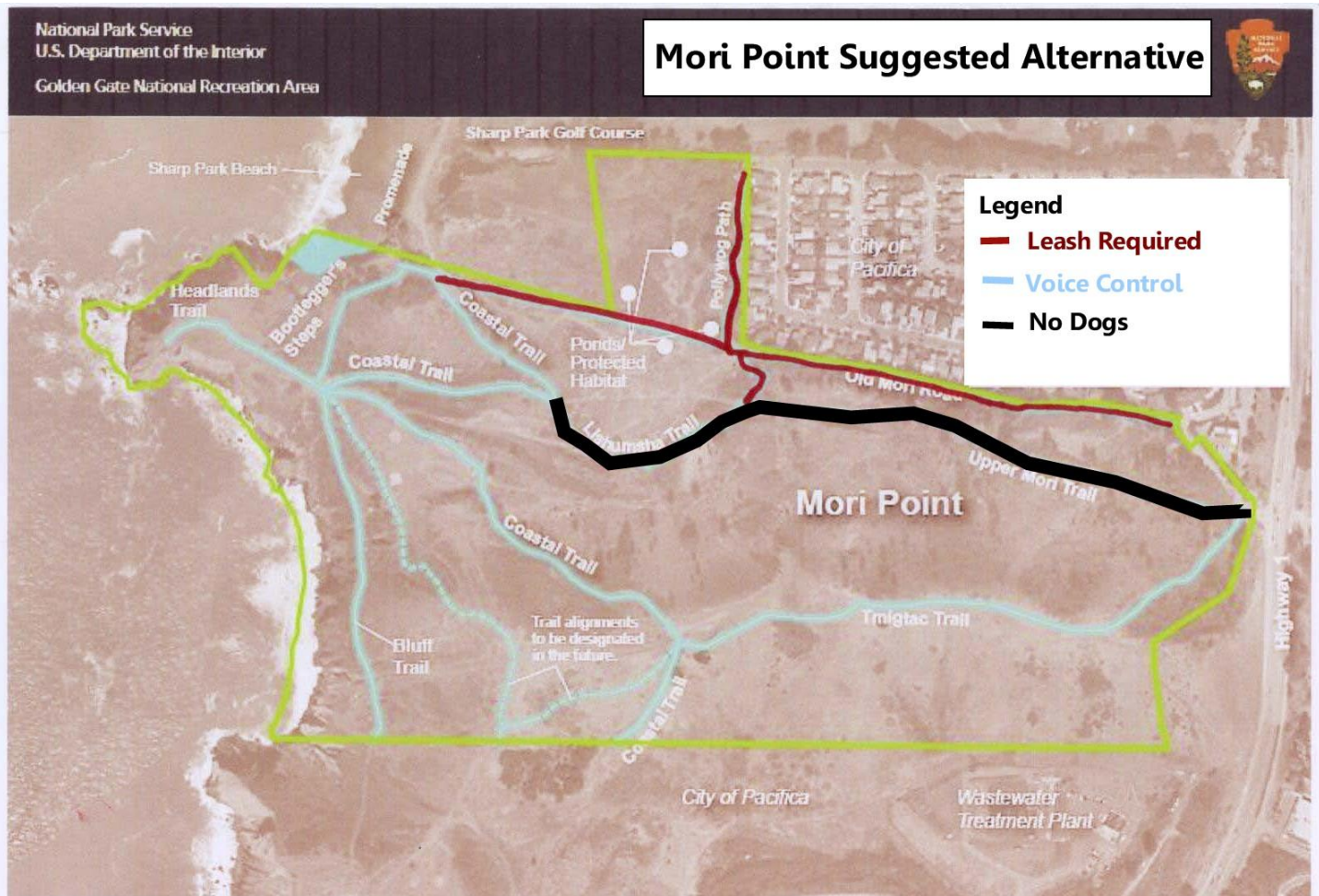
Mori Point Analysis and Suggestions

Overall Assessment

All adverse impacts shown for Mori Point for the “No Action” alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Mori Point since there is no scientific evidence or even reasonable correlations that dogs are more than negligibly impacting the park and particularly not the protected California Red-Legged Frog or the San Francisco Garter Snake.

I oppose all of the DEIS “action alternatives” as they represent “hoarding” by marginalizing the recreational mandate for the GGNRA and the recreational needs of an urban population and future generations. I support adding voice-control trails, one no dog trail, and adding other more inclusive solutions to improve dog recreation at Mori Point as defined below. Note that Sharp Park to the north and the Rock Quarry to the south are both heavy dog use areas, with many dogs off-leash. Access for dogs from the Pacifica residences must be maintained from the northeast as well. This is not a location that anyone with a significant fear of dogs would frequent.

Map of Suggested Mori Point Alternative



Recommended Changes to the “No Action” Current Dog Management Plan

Establish voice control trail access for Mori Point

Suggested Balanced Option

Voice-Control Allowed:

All trails except for near frog ponds and along city traffic

On-leash Only:

All trails near frog ponds and along city traffic

No Dogs:

- Enclosed pond areas
- Upper Mori Trail

Logic behind trail selection:

There is a high recreational demand for voice-control dog recreation as evidenced by the traditional usage and by the high rate of non-compliance with leash laws both on GGNRA and Pacifica park areas. Requiring leashes in certain areas provides areas for those that don't want any interaction with dogs and encourages voice-control dogs to use other trails. I assume the anti-dog-recreation people are most interested in the conservation areas around the ponds, so those are the areas selected for leash control plus the upper Mori Point trail would reduce any dog interactions with the dispersal areas from the pond. It is most importantly to provide an active path over the hill for those that want to walk or jog with their dogs using voice control from the north to south. It is also important to provide at least an on-leash path directly from the residential area to Sharp Park and Mori Point.

Benefits:

- 1) See **Voice Control Benefits for San Mateo County**
- 2) Mori Point is in large residential areas that are most likely to use the trails on a daily basis and to invest the time and effort in socializing, exercising, and training their dogs as well as benefit the most community camaraderie in the parks. I keep hearing people say that they purchased a house in the area because it seems like a good place to have dogs.

Comments:

- 1) On the other hand, the traditional use of Mori Point was for voice-control dog recreation and the current leash law violations support that there is a high demand for voice-control dog recreation. People are forced to drive to the San Francisco or to the East Bay to enjoy legal off-leash dog trails. Formal voice control rules need to be established for Mori Point to support this recreational need.
- 2) Considering this is likely the highest visitation park in San Mateo County, there is no reasonable justification for deeming that dog recreation has more than a negligible impact and attributing all general visitation issues to dog recreation. The biggest issue at Mori Point is the erosion caused by off-trail climbing of the hill. I have never seen a dog going up that hill but have seen several people climbing to the top of the hill. Dogs would not be going up that hill unless accompanied by a person and would not be causing the same level of damage as the heavier hikers with hiking boots.

- 3) There is no reasonable justification for denying San Mateo County to have voice control areas.
- The DEIS provides no scientific evidence that dogs are causing more than negligible environmental adverse impacts on Mori Point, particularly that dogs impact protected species such as SF Garter Snake or the California Red-Legged Frog. Please see discussion below regarding these species.
 - Per my FOIA to the Park Service, there is no GGNRA testing or inventories to provide any evidence that dogs negatively impact the Mori Point natural environment so the only available indication is anecdotal observations and that doesn't indicate any adverse impacts from dogs.
 - Other than 130 leash law violations from 2001 to 2010, there were almost no dog-related law enforcement issues on Mori Point; no wildlife disturbance, just 2 dog "bite/attacks", one cliff rescue ('04) and one "pet" related complaint. Mori Point was traditionally and continues to have high voice-control use. All available information supports that our companion dogs, either on-leash or by voice control, have a negligible impact on wildlife in this park.
 - The DEIS on page 273 is understating the dog visitation at Mori Point, as with other parks, by stating that visitors with dogs moderate (10-30%). Based on my experience, at least 1 in 3 visitors is accompanied by a dog on Mori Point but it varies by day and time. Note that based on the GGNRA visitorship methodology they are ignoring San Mateo County site visits and the "Visitor Use" measurement based on crowding provides little insight on the number of people that rely on this park for daily exercise and enjoyment.
 - Per the response to my FOIA request, there was never an environmental impact study conducted to justify removing or changing traditional voice-control access for Mori Point when it was acquired by the GGNRA.
 - I'm not able to determine the area that dogs potentially impact because I don't know the park acreage but I assume it is comparable to Sweeney at an estimated 0.5% of the park area. There is no evidence that dogs are more than negligibly impacting this park's natural environment, particularly not cumulatively that will impact future generations. In the last five years of actively hiking on Mori Point a few times a month my observations are:
 - a. Never seen any problem interactions between dogs and none between dogs and people. In addition, I have never seen a dog off the trail beds more than 10 feet and rarely see them off the trail because people and dogs are actively moving forward.
 - b. Potentially disturbing sensitive seedlings in the bare ground native plant restorations right on the trail beds is the biggest potential impact from dog recreation under the current plan. Before banning or requiring leashes, the Park Service should use temporary barriers or seedling protections that would be effective in a wilderness setting with large mammals such as deer, elk, coyotes, and bears. I've only casually observed these restoration project but I expect last year's lack of rainfall, slope, and ground preparation/nutrients are a bigger issue than a rare dog walking in the beds right next to the trail. All my life, I've seen dogs in gardens and yards and never observed trampling damages just some caused by active digging, which I've never seen at Mori Point.
 - c. Visitors are pretty dispersed on Mori Point so it is relatively easy for one to call and prevent voice-controlled dogs from interacting with pedestrians and on-leash dogs. I've never seen a horse or evidence of horse activity at Mori Point so that is virtually a non-issue. Visibility is good and trails are not made for high speeds so bicycles are also virtually a non-issue.
 - d. The vegetation shows no signs of trampling, digging, social trails, or bare spots caused by dogs.
 - e. Dogs have no impact on the wildlife at Mori Point and the adjacent open spaces, which are surrounded by residences, Highway 1, a shopping center and the ocean. The Park Service would

have to actively re-establish deer or other large mammals in zoo like condition in a relatively small space. Coyotes have been spotted in this high visitation park but aren't normal residents. Birds, based on the park soundscapes, are certainly prolific in the park as are reptiles and small mammals. Per the response to my FOIA, no inventory or monitoring of wildlife has been performed for Mori Point to provide any evidence of wildlife impacts.

- f. Also, see below for sections on San Francisco Garter Snake, California Red-Legged Frog, Soil/Vegetation, and Wildlife regarding the lack of evidence that dog recreation is causing any credible impact.
- The GGNRA has not conducted any testing to comprehensively evaluate the recreational barriers and needs of people. However, logically, Mori Point is not a place that people that are afraid or dislike of dogs are likely to go or want to go regularly because of the high use of surrounding Spark Park and the Rock Quarry for off-leash dogs. While it is likely that people choose to live in the adjacent neighborhoods because of the availability of nearby dog recreation; it is much less likely that people with intense dog fears/dislikes would choose this neighborhood and actively use Mori Point for hiking.
 - Install bigger signs and conduct a campaign (similar to leave no trace) to encourage irresponsible people with dogs to pick up. See Leave No Dog Trace below.

Mori Point in general has more litter, including dog litter, than other San Mateo County park trails. I assume this is because of the higher usage and would benefit the most from an active campaign.

- Install bigger signs at ALL entrances and trail junctions indicating dog rules for the specific area. See Dog Rule Trail Communication below.
- Implement voice-control awareness/training programs, in cooperation with organizations like the SPCA, to help minimize the few dog issues. Note that, if necessary, reasonable fees should be charged for the programs but there should also be options for low income individuals. See Awareness/Training Programs below.
- Monitor park visitation, conduct visitor surveys, and implement land use practices to evaluate how successful the GGNRA is in maintaining the Recreation and land management mandate at Mori Point. See Monitoring Success Related to Park Mandate below.

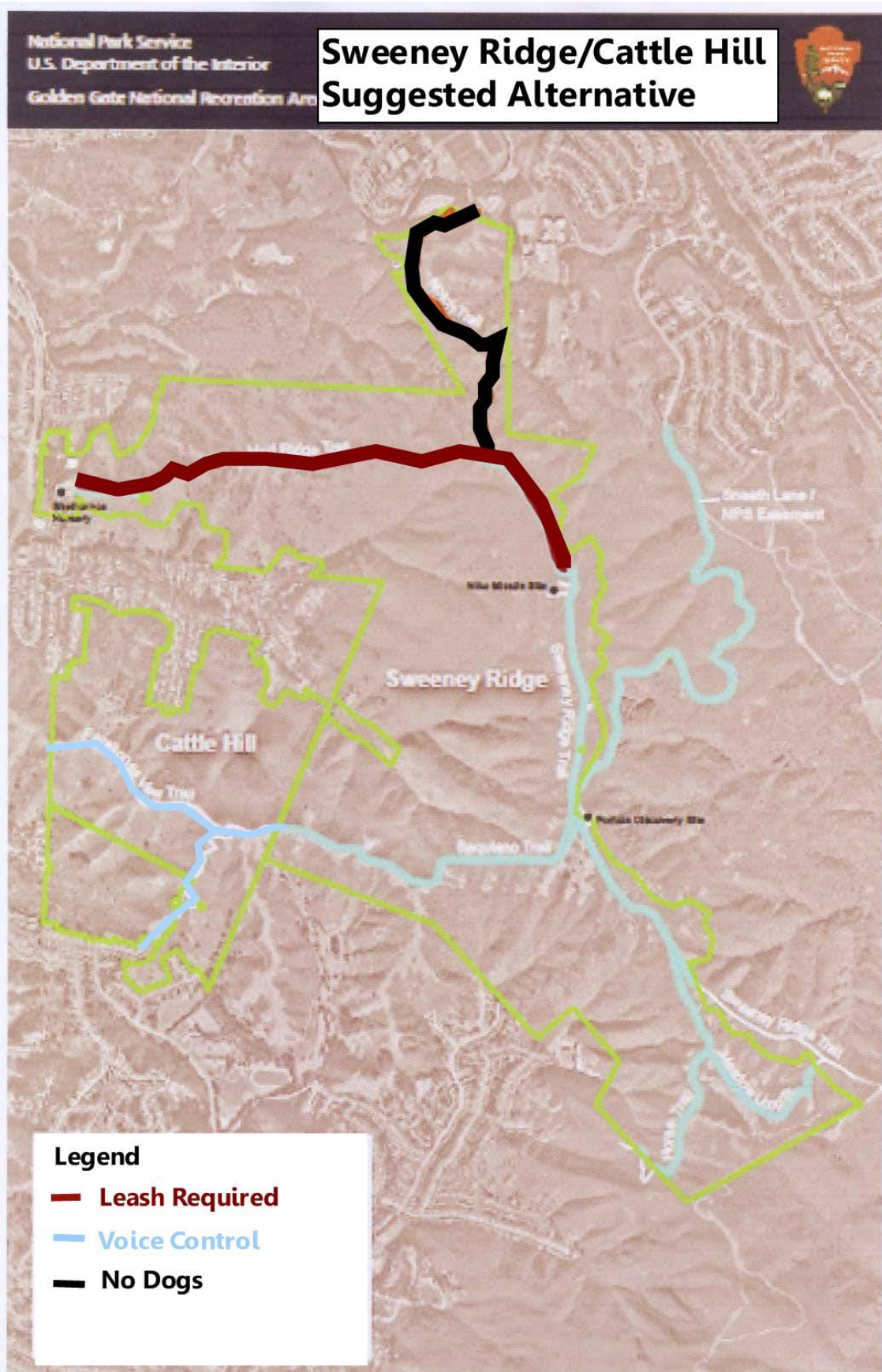
Sweeney Ridge/Cattle Hill Analysis and Suggestions

Overall Assessment

All adverse impacts shown for Sweeney Ridge for the “No Action” alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Sweeney Ridge or the adjacent Cattle Hill that is supported by scientific evidence or even reasonable correlations. Note Sweeney Ridge/Cattle Hill is a wildlife haven after decades of dog recreation and not a trail system that most people that fear dogs would choose considering that mountain lions and bobcats live in this haven.

I oppose all of the DEIS “action alternatives” as they represent “hoarding” by marginalize the recreational mandate for the GGNRA and the recreational needs of an urban population and future generations. 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.

Map of Suggested Sweeney Ridge/Cattle Hill Alternative



Recommended Changes to the “No Action” Current Dog Management Plan

- Establish voice control trail access from Bay side to the Coast side

Suggested Balanced Options

Voice-Control Allowed:

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) - *If this is not possible due to the SF Watershed Easement agreement then Sweeney Ridge should remain an on-leash trail and Notch Trail should become a voice control option.*

On-leash Only:

Trail from the Shell Dance Nursery to the Nike Missile Site

No Dogs:

Notch Trail - *If this is not possible for Sweeney Ridge to have voice-control due to the SF Watershed Easement agreement then Notch Trail should become a voice control option.*

Logic behind trail selection:

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. Even though there is no evidence of dogs impacting the Mission Blue Butterfly, Notch Trail also includes the habitat for the butterfly so even remote impacts are completely eliminated by designating this as a no dog trail.

Benefits:

- 1) See **Voice Control Benefits for San Mateo County**
- 2) Voice Control entrances are in large residential areas that are most likely to use the trails on a daily basis and to invest the time and effort in socializing, exercising, and training their dogs as well as benefit the most community camaraderie in the parks.

Comments:

- 1) All adverse impacts shown for Sweeney Ridge for the “No Action” alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Sweeney Ridge that is supported by scientific evidence or even reasonable correlations.
- 2) The DEIS “Preferred Alternative” ignores that the Sweeney Ridge Sneath Lane entrance is the only Bay-side entrance in San Mateo County to the GGNRA for people with dogs. The Sneath Lane trail is a fire road with several maintenance trucks a day and surrounding by dense vegetation and steep sides where even a poorly behaved dog has little opportunity to go off-road. There is no even remote justification to exclude dog recreation from Sneath Lane.
- 3) The traditional use of Sweeney Ridge was for voice-control dog recreation and the current leash law violations support that there is a high demand for voice-control dog recreation. People are forced to drive to the San Francisco or to the East Bay to enjoy legal off-leash dog trails.
- 4) Considering the negligible impact of hikers, with or without dogs, on just an estimated 0.5% of the Sweeney Ridge/Cattle Hill area and the extreme conservation of the huge SF Peninsula Watershed with a similar natural

environment, there is no reasonable justification for constraining dogs to the roads and not allowing them, along with their people, to go on the trails in this park. All of the DEIS “action alternatives” represent “conservation hoarding” by marginalize the recreational mandate for the GGNRA and the recreational needs of an urban population and future generations.

- 5) There is no reasonable justification for denying San Mateo County to have voice control areas.
- The DEIS provides no scientific evidence that dogs are causing more than negligible environmental adverse impacts on Sweeney, particularly that dogs impact protected species such as the Mission Blue Butterfly, SF Garter Snake, or the California Red-Legged Frog. Please see discussion below regarding these species.
 - Per my FOIA to the Park Service, there is no GGNRA testing or inventories to provide any evidence that dog negatively impact the Sweeney Ridge natural environment so the only available indication is observation and that doesn’t indicate any adverse impacts from dogs.
 - Other than leash law violations from 2001 to 2010, there is almost no dog-related law enforcement issues on Sweeney; this includes no wildlife disturbance, no “bite/attacks”, and no dog related complaints
 - Sweeney Ridge was traditionally and continues to have high voice-control use, and after 30 years is still a “wildlife haven” even per rangers in the 2007 to 2008 ranger tickets. There is no visible evidence of natural environment adverse impacts from dog activity. Even per the rangers, the area is rich with wildlife such as deer, birds, deer, bunnies, bobcats, and mountain lions. Based on personal observation, the wildlife has habituated to the current recreational activities, including voice control dogs. Also, there is no scientific evidence to the contrary.
 - There was never an environmental impact study conducted to justify removing or changing traditional voice-control access for Sweeney Ridge when it was acquired by the GGNRA. The environmental impact study didn’t even mention dog recreation so the voice-control rules should remain the same of the traditional use.
 - Based on a rough estimate, the trails and trail bed that currently allowed to dogs represents about 0.5% of the 23,000 acre Sweeney Ridge that borders on the huge SF Peninsula Watershed. There is no evidence that dogs are more than negligibly impacting this park, particularly not cumulatively that will impact future generations.
 - a. In five years of actively hiking on Sweeney Ridge almost daily, I’ve only seen one dog, a new rescue, that took off into the dense scrub and have never seen any more than negligible problems between dogs and none between dogs and people. Per the law enforcement data from 2001 to 2010, there was only one search and rescue and no wildlife disturbances reported. All available information supports that our companion dogs, either on-leash or by voice control, have a negligible impact on wildlife in this park.
 - b. On all Bay-side roads and trails, the vegetation is dense and poison oak filled and the roads/trails cuts up the hill which makes off-road dog travel risk almost zero. There is no visible evidence that dogs impact wildlife, vegetation or soil , other than a few dog feces that routinely gets picked up by another dog owner. My family and others pick it up on a routine basis, and I estimate about 5% of dog owners are negligent and would benefit from a poop collection campaign.
 - c. On the Coast-side roads and trails, the vegetation is less dense but dogs rarely leave the trail bed and only for a short distance. There is no visible evidence that dogs impact wildlife, vegetation or soil; other than a few nuisance dog feces that generally get picked up by another dog owner. There is no evidence that dog feces or urine has degraded the soil on Sweeney during the past 30 years and claims are purely speculative.

- d. This is not a high visitation park so it is relatively easy for one to call and prevent voice-controlled dogs from interacting with pedestrians and on-leash dogs. The biggest risk is bicyclists that pick-up speed coming down the hill that has sharp turns but that is just as big a problem for hikers, children, and other bicyclists as for dogs. I've never seen a horse on Sweeney Ridge and only a few horse piles off the Fassler entrance so that is virtually a non-issue. Particularly on the trail from Fassler, where horses seem more common, there is high visibility so people have great opportunity to call their dog and avoid any possibility of a conflict.
 - e. The DEIS on page 271 is understating the dog visitation at Sweeney Ridge, as with other parks, by stating that visitors with dogs is low (<10%) to moderate (10-30%). Based on my experience at the Fassler, Sneath Lane, and Shell dance entrances, at least 1 in 3 visitors is accompanied by a dog but it varies by day and time. Note that based on the GGNRA visitorship methodology they are ignoring San Mateo County site visits and the "Visitor Use" measurement based on crowding provides little insight on the number of people that rely on this park for daily exercise and enjoyment.
 - f. The vegetation shows no signs of trampling, digging, social trails, or bare spots caused by dogs off the roads and trails. Dogs may cause some negligible additional disturbances along the trail beds but there is nothing that can be identified as being specific to dog activity. It is highly unlikely that the few inconsequential paths cut off the main trails are caused by dogs and not by hikers, ranger activity, or equestrians. The GGNRA has complete no scientific studies to support any conclusions that dogs cause any impacts on the soil or vegetation, and it isn't reasonable to consider these impacts more than inconsequential.
 - g. Claims of dogs impacting the migratory paths of wildlife are purely speculations and not based on any scientific evidence particularly considering that these trails and roads are actively used by park trucks, water trucks, hikers, bicyclists, etc. Deer and mountain lions cross highways and co-exist in lands with other animals and predators; a dog accompanying a hiker is unlikely to cause anymore delay than a lone hiker, particularly considering that few people or dogs are on these trails in the early morning, night, and at dusk. The plethora of wildlife on Sweeney and the adjacent watershed areas provides no evidence that wildlife are being impeded. If anything the dense foliage on the Bay side, likely caused by suppressed fire management, impedes wildlife movement and limits suitable habitat for ground birds such as quail.
 - h. See below for sections on San Francisco Garter Snake, California Red-Legged Frog, Mission Blue Butterfly, Soil/Vegetation, and Wildlife regarding the lack of evidence that dog recreation is causing any credible impact.
- The GGNRA has not conducted any testing to comprehensively evaluate the recreational barriers and needs of people. However, logically, Sweeney Ridge is not a place that people that are afraid of dogs are likely to go or want to go regularly. They would perceive Sweeney Ridge as a truly a natural, high-risk setting with only a dirty portable toilet on top, and it is home to mountain lions, bobcats, and coyotes. Few people that are afraid of a dog are going to venture deep onto these trails with no amenities when there are so many nearby trails with little chance of any big animal sightings such as Mori Point, Sawyers Camp Trail, and San Bruno Mountain. They also have cleaner bathrooms and facilities.
 - Install downhill pedestrian warning signs on the Sneath Lane trail that warn drivers and bicyclists to slow down around curves

Benefit: Make drivers and bicyclists more cautious about picking up speed, particularly in blind curves, where they could hit a hiker, child, dog, bike, car, etc.

- Also provided holders so that people can provide feces bags to encourage other people to collect feces. See **Leave No Dog Trace** below.
- Install bigger signs and conduct a campaign (similar to leave no trace) to encourage irresponsible people with dogs to pick up the feces (particularly at Sneath Lane where there are no signs). See **Leave No Dog Trace** below.
- Install bigger signs at all entrances and trail junctions indicating dog rules for the specific area. See **Dog Rule Trail Communication** below.
- Routinely have trail maintenance volunteers or crews remove poison oak near the trail beds. See **Poison Oak Safety Issue** below.
- Implement a dog voice-control awareness/training programs, in cooperation with organizations like the SPCA, to help minimize the few dog issues. Note that, if necessary, reasonable fees should be charged for the programs but there should also be options for low income individuals. See **Awareness/Training Programs** below.
- Monitor park visitation, conduct visitor surveys, and implement land use practices to evaluate how successful the GGNRA is in maintaining the Recreation and land management mandate at Sweeney Ridge. See **Monitoring Success Related to Park Mandate** below.
- Work with the City of San Bruno or other responsible entities to address the on-going dumping and car vandalism problem at the Sneath Lane entrance.
 - a. We've been going to the Sneath Lane entrance almost daily for 5 years. It seems like at least 3 or 4 times a year there is broken windshield glass covering the parking area. In addition to the property damage, it is a safety issue for all people, including those with dogs, and for dogs. Once I slid on the glass and sliced my hand and knee during the fall, and dogs are also likely to get the glass fragments in their paws. These injuries were far worse than almost all of the dog "bite/attack" injuries described in the 2007-2008 ranger tickets and are a much greater risk to public safety on Sweeney than companion dogs. Particularly since there were no reported dog bites on Sweeney and that almost all "bite attacks" were non-injuries or minor scrapes or bruises in other SF and Marin parks; also, the CDC declared the US canine-rabies free.

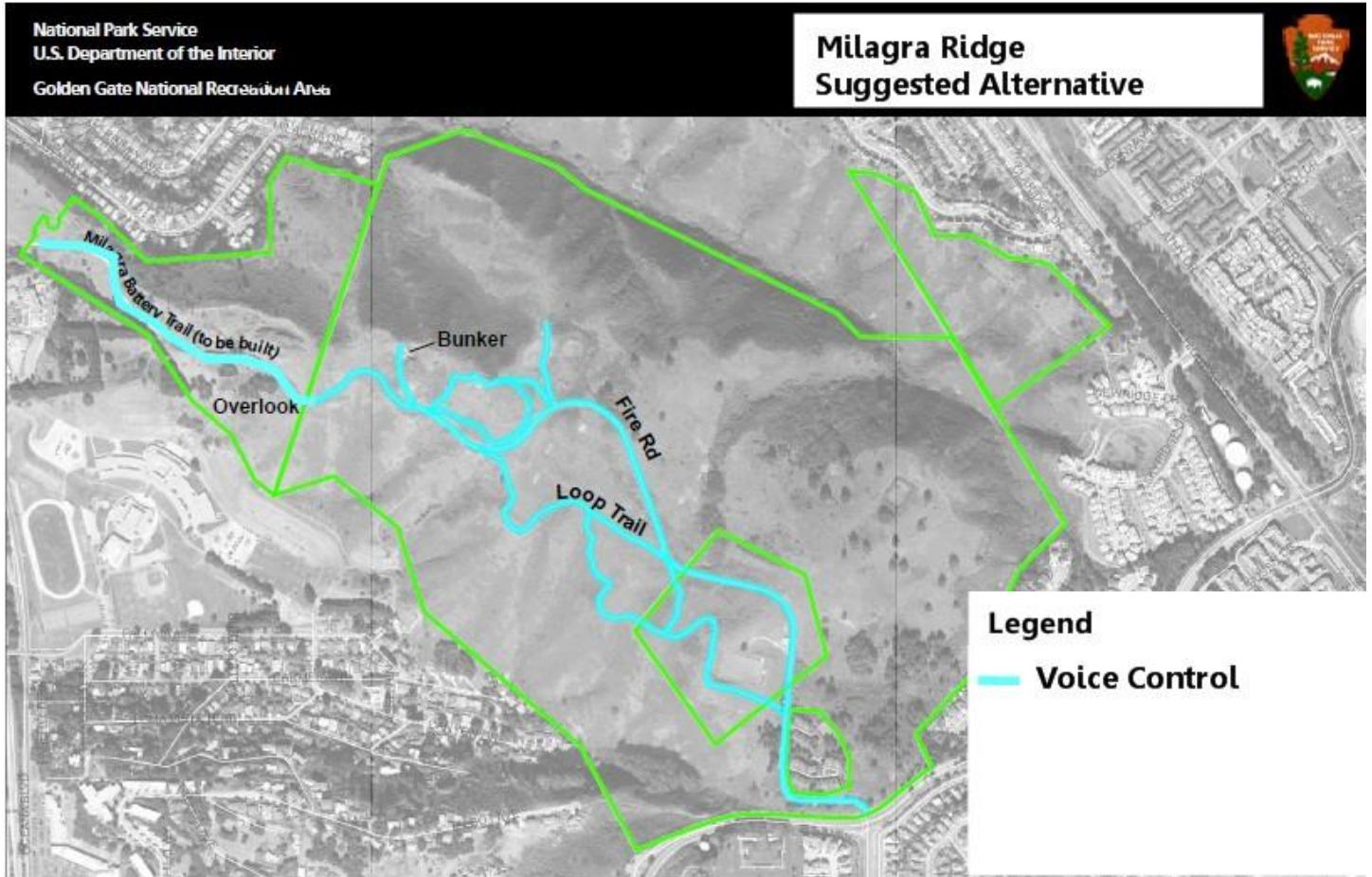
Milagra Ridge Analysis and Suggestions

Overall Assessment

All adverse impacts shown for Milagra Ridge for the “No Action” alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Milagra Ridge that is supported by scientific evidence or even reasonable correlations.

I oppose all of the DEIS “action alternatives” as they represent “conservation hoarding” by marginalize the recreational mandate for the GGNRA and the recreational needs of an urban population and future generations. I support adding voice-control trails and adding other solutions to improve dog recreation at Milagra.

Map of Suggested Milagra Ridge Alternative



Recommended Changes to the “No Action” Current Dog Management Plan

Allow voice control trail access

Suggested Balanced Options

Voice-Control Allowed:

All trails, due to the nature of the trail system there is no reasonable method to create separate areas

On-leash Only:

None.

No Dogs:

None

Logic behind trail selection:

There is no evidence of dogs impacting the Mission Blue Butterfly (MBB) or its habitat; therefore, dogs should be allowed on all trails, as they are today, unless scientific studies provide substantial evidence that dogs are causing significant harm to the MBB species.

Benefits:

- 1) See **Voice Control Benefits for San Mateo County**
- 2) Milagra Ridge is adjacent to apartment complexes and several housing residences are nearby
- 3) The scenic San Andreas Fault trail system and San Bruno Mountain trail systems do not allow dogs

Comments:

- 1) Traditional use of Milagra Ridge was for voice-control dog recreation and the current leash law violations support that there is a high demand for voice-control dog recreation. People are forced to drive to the San Francisco or to the East Bay to enjoy legal off-leash dog trails.
- 2) There is no reasonable justification for denying San Mateo County resident voice control areas. The DEIS provides no scientific evidence that dogs are causing more than negligible environmental adverse impacts on Milagra Ridge, particularly that dogs impact protected species such as the Mission Blue Butterfly, SF Garter Snake, or the California Red-Legged Frog. Please see discussion below regarding these species.
- 3) Per my FOIA to the Park Service, there is no GGNRA testing or inventories to provide any evidence that dog negatively impact the Milagra Ridge natural environment so the only available indication is observation and that doesn't indicate any adverse impacts from dogs.
- 4) Other than 65 leash law violations from 2001 to 2010, there were almost no dog-related law enforcement issues on Milagra Ridge; this includes no wildlife disturbance, 1 "bite/attacks", and 2 other unspecified "pet" incidents. These do not represent a significant impact on the environment or other park users.
- 5) Milagra Ridge was traditionally and continues to have high voice-control use. There was never an environmental impact study conducted to justify removing or changing traditional voice-control access for Milagra Ridge when it was acquired by the GGNRA.
- 6) The DEIS on page 273 is understating the dog visitation at Milagra Ridge, as with other parks, by stating that visitors with dogs is low (<10%) to moderate (10-30%). Based on my experience at least 1 in 3 visitors is accompanied by a dog but it varies by day and time. Note that based on the GGNRA visitorship methodology, the Park Service is ignoring San Mateo County site visits and the "Visitor Use" measurement based on crowding provides little insight on the number of people that rely on this park for daily exercise and enjoyment.
- 7) I'm not able to determine the area that dogs potentially impact because I don't know the park acreage but I assume it is comparable to Sweeney Ridge at an estimated 0.5% of the park area. There is no evidence that dogs are more than negligibly impacting this park's natural environment, particularly not cumulatively, that will

impact future generations. In the last five years of actively hiking on Milagra Ridge a few times a year and more closely observing the park over the past few months:

- a. Most trails are enclosed by cable fencing and the vegetation is poison oak filled which makes off-road dog travel risk almost zero. There is no visible evidence that dogs impact wildlife, vegetation or soil; other than a few nuisance dog feces that generally gets picked up by another dog owner. There is no evidence that off-path dog travel creates bare patches, dog feces or urine has damaged the soil or vegetation on Milagra Ridge. The claims are purely speculative and not supported by observable evidence or scientific evidence.
- b. This is not a crowded park so it is relatively easy for one to call and prevent voice-controlled dogs from interacting with pedestrians and on-leash dogs. I've never seen a horse on Milagra Ridge, and it isn't a likely destination for equestrians.
- c. The vegetation shows no signs of trampling, digging, social trails, or bare spots caused by dogs. Dogs may cause some negligible disturbances along the trail beds but there is nothing that can be identified as being specific to dog activity. It is highly unlikely that the few inconsequential paths cut off the main trails are caused by dogs and not by hikers and ranger activity. The only visible trampling I've seen seems to be trampling that appeared to be caused by volunteers or rangers marking native plant specimens with flags or removing invasive plants.
- d. See below for sections on San Francisco Garter Snake, California Red-Legged Frog, Mission Blue Butterfly, Soil/Vegetation, and Wildlife regarding the lack of evidence that dog recreation is causing any credible impact.

- The GGNRA has not conducted any testing to comprehensively evaluate the recreational barriers and needs of people. However, logically, Milagra Ridge is not a place that people that are afraid of dogs are likely to go or want to go regularly, with or without dog recreation. They would perceive Milagra Ridge as a truly a natural, high-risk setting with only a dirty portable toilet. It is also home to at least bobcats and coyotes. Few people that are afraid of a dog are going to venture deep onto these trails with no amenities when there are so many nearby trails with little chance of any big animal sightings such as Mori Point, Sawyers Camp Trail, and San Bruno Mountain. They also have cleaner bathrooms and facilities.

- Also provided holders so that people can provide feces bags to encourage other people to collect feces. See **Leave No Dog Trace** below.
- Install bigger signs and conduct a campaign (similar to leave no trace) to encourage irresponsible people with dogs to pick up the feces (particularly at Sneath Lane where there are no signs). See **Leave No Dog Trace** below.
- Install bigger signs at all entrances and trail junctions indicating dog rules for the specific area. See **Dog Rule Trail Communication** below.

Milagra Ridge actually has the best educational signage I've seen on the GGNRA trails systems (e.g., large and spread throughout the park) that I've seen and the style should be a model for other parks to consider.

- Routinely have trail maintenance volunteers or crews remove poison oak near the trail beds. See **Poison Oak Safety** Issue below.

Milagra Ridge foot trails often have poison oak branches/leaves hanging into the pathway. These are a danger to people and particularly any child that is walking on the path. There is also a high likelihood that a dog will brush against the leaves/branch and the resin will be transferred to people.

- Implement a dog voice-control awareness/training programs, in cooperation with organizations like the SPCA, to help minimize the few dog issues. Note that, if necessary, reasonable fees should be charged for the programs but there should also be options for low income individuals. See **Awareness/Training Programs** below.
- Monitor park visitation, conduct visitor surveys, and implement land use practices to evaluate how successful the GGNRA is in maintaining the Recreation and land management mandate at Sweeney Ridge. See **Monitoring Success Related to Park Mandate** below.

Pedro Point Analysis

Overall Assessment

All adverse impacts shown for Pedro Point for the “No Action” alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Pedro Point that is supported by scientific evidence or even reasonable correlations.

I am not highly familiar with Pedro Point and have only hiked there once several years ago. I believe Pedro Point may be a reasonable site for “No Dog” other than connector trails through the park. However, these would need to be determined based on the needs of the local residents.

There is no justification for excluding dogs based on natural environment or protected species impacts provided in the DEIS. Please see the discussion of San Francisco Garter Snake, California Red-Legged Frog, Hickman’s potentilla, Soil/Vegetation, and Wildlife below. This small park area is enclosed by highway 1, the ocean, and residences, no large mammals are unlikely to even enter the area and there is no evidence that voice-controlled or leash controlled dogs would impact the wildlife populations any more than at other low visitation, trail areas. As for the protected species, there is no evidence that dogs would impact the species that don’t even currently exist at the site even if they did exist. In particular, the Hickman’s potentilla has never been known to exist at this site and is non-native to the area and should be removed from the impact statements completely.

Similar signage, training, and awareness programs should be implemented for Pedro Point as for other GGNRA park trail systems.

General Non-Site Specific Suggestions & Comments

Recreation Mandate

According to the GGNRA enabling legislation, recreation is a mandate of the GGNRA and needs to be enabled for an urban population. Based on the 2002 Population Survey performed by the GGNRA, walking dogs is a high value recreational activity enjoyed by 15% of Bay Area Residents which is some 450,000 people based on the 2008 US Census Data. In addition, at least 1 in 3 people have dogs in America so there is an even greater opportunity to encourage people to enjoy this healthy and safe recreational activity. All indications are that walking a dog is one of the most in demand recreational activities in the GGNRA, particularly in urban communities bordering on the GGNRA lands; and the Park Service has provided no evidence that dog walking is not one of the most in demand recreational activities in the GGNRA. In addition, tourists that travel with their dog need opportunities to enjoy the outdoors with their dogs.

The GGNRA in the DEIS and in public presentation about the plan has treated people with dogs as a nuisance instead of an important group of recreational users of the park. The Park Service continues to imply to the public that dog recreation is illegal even though two federal judges have upheld the 1979 Pet Policy and the Park Service has the ability to amend their regulations to be more directly tolerant to dog recreation activities. Their pet regulations are arbitrarily defined by the Park Service and are not laws but Park Service written regulation. At this point after review all the evidence available to me, the Park Service leadership seems highly biased against dog recreation and is pushing their personal biases to marginalize recreation by providing exaggerated, misleading, and speculative evidence instead of unbiased scientific evidence. The Park Service is attempting to do “conservation hoarding” and exclude necessary urban recreation for which this park was established.

Biased DEIS Representations

As an example of a biased representations that demonstrates the Park Service’s intolerance for dog recreation, several impact statements for wildlife in the coastal scrub areas are rated as moderate and imply that dogs are preventing healthy wildlife populations without any scientific basis for the moderate or even minor ratings. The law enforcement data doesn’t indicate a single wildlife disturbance in the San Mateo County parks in 10 years and even if there were that seems inconsequential in the big picture of the GGNRA enabling legislation or real wildlife conservation.

The Park Service is trying to marginalize or eliminate low impact dog recreation when more than 60 other parks in the National Park system allow hunting because of their enabling legislation as shown in the attached: [Example of Enabling Legislation Allowing Hunting – A significant wildlife disturbance](#) and [>60 National Park Service Ran Parks Allow Hunting](#) In addition, fishing and equestrians are allowed in National Parks units including the GGNRA, snowmobiling is allowed in Yellowstone, and off-road vehicles in some other parks. All have a much greater impact, particularly by individual recreational user, than walking a dog. In Yellowstone, the Park Service conducted extensive research on the impacts of snowmobiles while only conducting almost no unbiased studies regarding dog recreation in the GGNRA, even though the proposed dog management plan impacts hundreds of thousands of people’s daily lives and undermines the recreational mandate of the park.

In addition, the National Park Service itself is currently studying the effects of habituation as outlined in this article on the Perspectives on Human Dimensions of Wildlife Habituation:

http://www2.dnr.cornell.edu/hwtolerance/documents/workshop_report.pdf

There is no reason to assume that wildlife is any less likely to habituate to dog recreation than other human activities, particularly after all these decades, and in fact, some minor dog interaction may be beneficial if wildlife are dissuaded

from directly approaching humans. In fact, some people feel safer because a mountain lion or another person is less likely to attack them if they are accompanied by a dog and there is less potential for serious conflicts. The primary premise in the DEIS is that dogs are natural predators but the DEIS fails to mention that humans are also natural predators that wildlife would naturally avoid at some level. Fortunately, wildlife in these areas have had tens of thousands of years to adapt to human and canine activity and the current level of activity has been maintained for decades in San Mateo County without readily apparent impacts on overall wildlife populations.

Most parks in the National Park System allow fishing and some allow off-roading. All these activities fundamentally have a much greater impact on wildlife and vegetation than people walking with companion dogs that rarely even disturb wildlife or leave the trail beds. The DEIS also ignores that people passing wildlife flush the wildlife off the trail so the companion dog interactions just cause the wildlife to leave the trail sooner. In total, all the dogs in the parks for a day probably have less of an impact than a single hunter or a single grizzly bear (native but now extinct in California) would have on the 80,000 acres in a day. Any more than negligible impact statement for wildlife from walking with a dog are completely exaggerated and taken out of context and demonstrates extreme biases. There seems to be no justification for this DEIS other than extreme prejudice against people with dogs by the Park Service that has manipulate and misrepresented information to achieve their desired goal of excluding people with dogs. The 25 percent compliance rule in and of itself demonstrates that the Park Service is intent on excluding all people with dogs over the next few years instead of working to resolve any real issues.

Benefits of Voice Control Areas for San Mateo County GGNRA Park Areas

- 1) Provides the NPS with an aid for the Healthy Parks Healthy People initiative since dogs encourage people to exercise more often and for longer distances plus facilitates healthy social interactions.
- 2) Encourages and provides for a high demand recreational activity that is healthy and encourages the at least 1 in 3 people with dogs, particularly those in the nearby neighborhoods, to take long daily walks in the outdoors. All these benefits contribute equally to children, seniors, people with disabilities, all incomes, all ethnic groups, etc. One of the greatest benefits of exercising in the GGNRA is that it is available to all; no matter their social-economic position and the GGNRA is one of the greatest benefits of living in the Bay Area.
- 3) San Mateo County has no reasonable voice control hiking options:
 - a. Esplanade is not a reasonable substitute because it is not easily assessable by families or people with disabilities and does not offer a trail experience plus it seems more dangerous than other beaches in the area (aka the small beach area with no place to escape, riptides, etc.) I was only recently able to find Esplanade Beach and understand why it is not a beach that many people would want to frequent. Pulgas Ridge only has a small play area about 1/3 mile long in the middle of the longer on-leash trail system. In addition Pulgas Ridge is far from people on the San Mateo coast and northern part of the county and is not a reasonable location for daily exercise for these people.
 - b. Fenced city dog parks (dog parks) are not trails and are not a substitute for an outdoor experience with a voice-controlled dog. Comparing dog parks to hiking trails is the equivalent of saying people don't need access to GGNRA hiking trails because there are children's playgrounds in city parks. All are important to our community but none are substitute for the other. Fenced city dog parks are an excellent resource but do not encourage adequate daily exercise for most people. In addition, Ella, like a child on a playground with other children, got a great workout playing with other dogs in dog parks when she was a puppy and adolescent. Now, she just stands around, particularly since she isn't highly motivated by fetch. Hiking trails get both the people and the dogs moving. In addition, dog parks are too intense for many dogs that need more space to be comfortable and to avoid confrontations.

- 4) People receive mental health benefits (e.g., stress relief) from empathetically watching the joyful activities of their canine companions, from playing with their dog, and from socializing with others.
- 5) Facilitates the recreational experience for people with disabilities and families with small children that may have difficulty managing a leash along with other needs (e.g., a stroller, wheelchair, balancing, etc.)
- 6) Enables people to continue using dogs as a social facilitator since dogs, like small children, help bridge social barriers and often spark social exchanges that don't happen in the absence of a dog or some other social bridge
- 7) For most dogs (aka those without significant behavioral problems), leashes impede healthy social interactions and increase leash reactivity problems. If a dog is super motivated to meet other dogs and is constantly suppressed or given leash corrections, these frustrating interactions and corrections can lead to negative associations and real aggression. In addition, restraining a pulling-frustrated dog on a leash causes a body language that is associated with an aggressive stance and creates a dog-dog communication problem. Encouraging regular dog-dog greetings with friendly dogs helps create and maintain friendly dogs with good social skills and positive associations.
- 8) Voice-controlled dogs are more likely to be able to meet and greet which means that their people are more likely to have healthy social interactions, instead of actively avoiding each other on the trails. In my local neighborhood dogs don't meet and greet. Instead there is an elaborate crossing of streets to avoid each other because dogs either don't have social skills or you don't know that they do.
- 9) Facilitates people responsibly exercising, socializing, and training their canine companion which reduces dog behavior problems, makes for healthier and happier dogs, increases the human/canine bond, etc. All make for dogs that are safer when in public spaces, when at home (particularly around new babies, children and the elderly), if they escape onto the street, if they are abandoned in a shelter, etc.
- 10) Intensifies the canine/human bond because of the shared enjoyable experiences which reduces the abandonment of dogs to shelters or the inhumane treatment of dogs.
- 11) Provides remote areas that facilitate the training of dogs with behavioral issues and/or training needs.
- 12) Legally allows people to participate in this highly enjoyable recreational activity without having to incur the personal costs and environmental costs of driving to San Francisco, the East Bay, or to places like the Tahoe National Forest.
- 13) Disperses the current high concentration of dog recreation in legal off-leash places like Fort Funston to more balance the recreational impacts on the 80,000 acres and city parks.
- 14) Eliminates virtually all law enforcement activities related to dogs and improves relations with the dog community. Designating voice-control areas will reduce law enforcement costs and efforts that are currently wasted by the suppressive regulations that don't address the high demand for voice control dog-walking recreation
- 15) Provides local legal outlets that will encourage off-leash people to walk on these trails instead of the on-leash/no dog trails; therefore, people that dislike or are afraid of dogs will have even less negative encounters if they truly appreciate and self-select to use the "no dog" or on-leash trails

Visitor Experience & Public Health and Safety

Please see my public comment regarding Public Health and Safety.

Poison Oak Safety Issue

- Routinely have trail maintenance volunteers or crews remove poison oak near the trail beds

Benefit: Reduces the number of serious poison oak related rashes that people experience. I've personally had several experiences with brushing up against poison oak over the past 15 years that have severely incapacitated me for about a week. These poison oak incidents are far worse than all the 2007 or 2008 dog "bite/attacks" in

the PDF except for the motorcycle/dog accident. Even if the dogs stay on the trail, they can brush against the poison oak and transfer the resin to people, even if the person avoided the branch.

Leave No Dog Trace

- Install bigger signs and conduct a campaign (similar to leave no trace) to encourage irresponsible people with dogs to pick up the feces (particularly at Sneath Lane where there are no signs). Also provided holders so that people can provide feces bags to encourage other people to collect feces.

Benefit: Helps educate the remaining dog owners that they shouldn't leave the feces, even in the wilderness.

Dog Rule Trail Communication

- Install bigger signs at all entrances and trail junctions indicating dog rules for the specific area

Benefit: Helps educate the remaining dog owners that they shouldn't leave the feces, even in the wilderness.

Monitoring Success Related to Park Mandate and Science Based Information

- Monitor park visitation, conduct visitor surveys, and implement land use practices to evaluate how successful the GGNRA is in maintaining the Recreation and land management mandate at San Mateo County Park Units. The GGNRA does not track visitation for San Mateo County nor evaluate performance related to achieving the GGNRA mandate of recreation or sound land management. **The enabling legislation states** "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."
 - The Park Service in the GGNRA is not using sound land use practices to evaluate the natural environment to provide a scientific basis for managing recreational activities and ensuring that the park is maintained for the current and future generations. Based on the Park Service response to my FOIA request, the GGNRA has not conducted monitoring of these park units since the 1990s. Instead of relying on science, the Park Service is relying on dogma and personal biases to guide management plans that are detrimental to the recreational values of the park. The need for scientific monitoring is supported by the enabling legislation and the following NPS Policies 2006 excerpts:

4.1 "The Service will reduce such uncertainty by facilitating and building a science-based understanding of park resources and the nature and extent of the impacts involved."

4.1.1 "Similarly, planning for park operations, development, and management activities that might affect natural resources will be guided by high-quality, scientifically acceptable information, data, and impact assessment. Where existing information is inadequate, the collection of new information and data may be required before decision-making. Long term research or monitoring may also be necessary to correctly understand the effects of management actions on natural resources whose function and significance are not clearly understood."

2.3.1.4 Decisions documented in general management plans and other planning products, including environmental analyses and documentation, will be based on current scientific and scholarly understanding of park ecosystems and cultural contexts and the socioeconomic environment both

internal and external to the park. The collection and analysis of information about park resources will be a continuous process that will help ensure that decisions are consistent with park purposes.

- The park service is not monitoring the state of maintaining the recreational values for present and future generations.
 - Based on Park Service response to my FOIA request, the park service is not conducting routine recreational surveys to evaluate visitor or recreational user satisfaction with the GGNRA experience nor other surveys to help identify recreation current usage and the populations needs or barriers
 - 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
 - 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
 - Note 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
- The monitoring of recreational value and environmental impacts should be used to adjust the land use and management strategies (e.g., awareness, signage, barriers, etc.) for each park site. For example, if the “no dog” trails have an increase in visitorship due to “no dogs” then perhaps additional “no dog” trails should be added or vice versa.

Additional Notes on Natural Resource Monitoring Value:

Why is it significant that other Recreation Areas perform annual monitoring of resources and the GGNRA does not? Why is monitoring so important? As stated in an NPS publication, “Monitoring the Condition of Natural Resources in US National Parks”

(http://science.nature.nps.gov/im/monitor/docs/Monitoring_Park_Condition.pdf) the purpose of monitoring is as follows: The overall purpose of natural resource monitoring in parks is to develop scientifically sound information on the current status and long term trends in the composition, structure, and function of park ecosystems, and to determine how well current management practices are sustaining those ecosystems. Use of monitoring information will increase confidence in manager's decisions and improve their ability to manage park resources, and will allow managers to confront and mitigate threats to the park and operate more effectively in legal and political arenas.

Additionally, a review of NPS online resources reveals that there is an entire infrastructure set up to guide and facilitate NPS properties in their monitoring duties, “Vital Signs Monitoring” (<http://science.nature.nps.gov/im/monitor/index.cfm>)

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.”

Awareness/Training Programs

- Implement a dog voice-control awareness/training programs, in cooperation with organizations like the SPCA, to help minimize the few dog issues. Note that, if necessary, reasonable fees should be charged for the programs but there should also be options for low income individuals.
 - b. Educate people on the rules regarding areas that allow dogs and what the rules are
 - c. Create common etiquette and rules of the road for these more natural parks:
 - i. Controlling voice control dogs to not allow unsolicited dog encounters with pedestrians, bikes, horses, leashed dogs
 - ii. Not throwing objects off the trail to encourage fetch games that may damage vegetation
 - iii. Not encouraging dogs to go off the trail
 - iv. Preventing dogs from harassing wildlife or digging
 - d. Training programs in cooperation with leading dog organizations
 - v. Dog play/recall/trail training and awareness/rules
 - vi. Dog desensitization/management for horse encounters
 - vii. Knowing what is appropriate recreation for their particular dog
 - e. Encourage people to train for voice-control with their dogs at parks like Fort Funston, before attempting to hike under voice control on trails or high mixed use
 - f. Educate and encourage disadvantaged groups to use their dogs to facilitate daily exercise, family activities, and community engagement and to also socialize, exercise, and train their dogs to make them healthier and safer for the community
 - g. Use these forum to encourage sound stewardship and to encourage people with dogs to volunteer to improve the parks

Protected Species/Natural Environment Non-Site Specific Suggestions & Comments

San Francisco Garter Snake

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.

Based on the URS for San Mateo County, the SF Garter Snake has never even been documented at Sweeney Ridge, Milagra Ridge or Pedro Point and only in one location on Rancho Corral de Tierra. Just having suitable habitat is certainly not reasonable justification to even list as a potential issue and certainly not to rate as a minor adverse impact. While individuals exist at Mori Point, there is no evidence to list dog recreation as a minor adverse impact there either. Even if dogs were under voice control in these areas, there is no credible link between voice-controlled dogs and the garter snake, particularly in comparison to other common activities like the Park Service use of vehicles, water trucks on Sneath Lane, or bicycles.

California Red Legged Frog

There is no evidence other than speculation that dogs have had or will have any impact on the California Red Legged Frog population, particularly in comparison to other park activities such as the park service using vehicles for plant restoration on Mori Point or patrols or bicyclists. According to the US Fish & Game recovery plan, dogs are not a listed as a threat to the frog. The ponds are enclosed at Mori Point so it is only a rare anecdotal dog that enters the ponds and that is not likely to have any more than a negligible impact on the population at Mori Point. As for frogs on dispersed habitats, the DEIS provides no evidence of dogs interacting with or harming any of the frogs in the GGNRA.

Based on the URS for San Mateo County, the California Red Legged Frog has never even been documented at areas of Sweeney Ridge, Milagra Ridge or Pedro Point that allow dog access and only in a few locations on Rancho Corral de Tierra. Just having suitable habitat is certainly not reasonable justification to even list as a potential issue and certainly not to rate as a minor adverse impact. While individuals exist at Mori Point, there is no evidence to list dog recreation as a moderate adverse impact there either particularly considering the ponds are enclosed. Even if dogs were under voice control in these areas, there is no credible link between voice-controlled dogs and the frogs, particularly in comparison to other common activities like the Park Service use of vehicles or bicycles.

Hickman's potentilla - Federally and state endangered

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.

Mission Blue Butterfly

There is no evidence other than speculation that decades of dog recreations has had or will have any impact on the Mission Blue Butterfly population. Dogs aren't listed as a threat on any on the US Fish & Game or GGNRA literature or the monitoring literature on the Mission Blue Butterflies such as the Mission Blue Butterfly Monitoring in the Golden Gate National Recreation Area by Susie Bennett on the sfnp.org website. The butterflies decline at GGNRA sites is linked a fungal pathogen that killed 80% of the host plant and then it could not be re-established because of lack of natural disturbances including elk grazing and grass fires. The overall population decline is due to habitat lost to development not due to dog recreation.

There is no credible justification for rating dog recreation as Minor adverse impact at Sweeney Ridge or Milagra, particularly considering that 1) dogs are not allow on Notch Trail where the host plants exist on Sweeney Ridge and 2) there is no evidence that even off-road travel by a dog would harm the plants. Even if trampling existed, the DEIS does not document the extent and if it does exist it is mostly likely due to hikers or Park Service activities not dogs.

The same is true for all the DEIS rating above negligible. Just because the Mission Blue Butterfly exists at these sites does not mean there is any impact from dogs. If the park service wants to be extra cautious the Park Service should install simple cable barrier which have been quite effective in keeping people and dogs on the path. However, the lupines on Milagra Ridge seem the most prolific where there has been some soil disturbance, probably by hikers. From talking with a ranger testing the lupines reaction to soil disturbances at Milagra Ridge, the only real impact from dogs would be if the dog was actively digging up the adult lupines and that would take deliberate intent for an owner to allow and the increased regulations are unlikely to stop someone that wants to deliberately destroy the plants. There is not even anecdotal evidence that dogs have dug or impacted the lupine population or the butterfly. Unless scientifically justified, these ratings should all be changed to negligible for the "no action" alternative and should not be used as a justification for reducing or banning dog recreation.

Alta Trail, Orchard Fire Road and Pacheco Fire Road	Moderate
Fort Baker	Minor
Marin Headlands Trails	Moderate
Milagra Ridge	Minor
Oakwood Valley	Moderate
Sweeney Ridge	Minor

Soil/Vegetation

There is no credible evidence that dogs are causing more than negligible measurable damages to the soil/vegetation at any site in San Mateo County that has a significant impact. Based on my personal observations, the only social trails and erosion are at Mori Point from people going off trail, up to the scenic top. I've never even seen dogs on the social trails at the site, and they would only go up those trails if accompanied by a person. I've only seen people climbing to the top of the hill, and there are few signs to deter people from going up those social trails nor a Park Service trail to the peak. The existence of these social trails, straight up the hill, gives the appearance of being the trail to the scenic top.

The Park Service has provided no scientific evidence that dog urine or feces is impacting the soil at any of these sites or that compaction is occurring, and there is no visible evidence that isn't attributable to just people alone. Certainly, the vegetation is healthy except for some of the native plant projects on the site that seem to be lack for rain fall. Certainly,

Sweeney and Milagra show no signs of dogs causing any visible impact on the soil or vegetation. At Milagra, I mainly see trampling from volunteers/rangers marking native plant occurrences. The DEIS provides no scientific measurements and no evidence that current dog activity will impact soil or vegetation incrementally and impact future generations enjoyment of the park. In addition, I requested evidence supporting the impacts in a FOIA and the Park Service did not provide any evidence. The park service can address any perceived problems with the native plant projects by using barriers or plant guards that would be required for a wilderness area. In the wilderness, animals such as wild canine and deer would destroy the native plant restoration seedlings immediately. The Park Service should use similar techniques on the Mori Point areas that are immediately adjacent to the paths, plus supplement with adequate water and nutrients. Certainly the native plants appear to be healthier this year perhaps due to the increased rainfall.

All adverse impacts for the “No Action Alternative” should be changed to “Negligible” unless there is actual measurable evidence that the dogs have had impacts on the soil or vegetation over the decades and those impacts are incremental more than negligible wear and tear that is not accumulating. In addition, dogs stay near the trail beds and at most an estimated impact of 0.5% of the soil and vegetation at any of the sites. Certainly dogs are relatively small, distribute their weight on four paws, and don’t create new social trails along the San Mateo trails system due to the random and infrequent nature of any off-trail activity. If the Park Service, speculates that dog recreation is creating a greater impact, the Park Service should conduct scientific studies to justify that position before claiming more than negligible impacts.

It may seem trite but Grizzly Bears once roamed these lands and one 350 pound Grizzly Bear probably had more of an impact on vegetation and soil than all of the dogs off the trail beds in San Mateo County. Vegetation and soil can easily withstand a few relatively small, four pawed dogs randomly off the trail bed for short periods of time. However, most dogs stay on the trails and I never see owners encouraging dogs to go off the trail, particularly considering that poison oak is an issue at most sites and people are actively hiking or jogging. The Park Service is creating imaginary impacts and showing little understanding of significant impacts on vegetation or soil that are truly detrimental of nature. All impacts in the DEIS related to soil and vegetation should be changed to negligible for San Mateo County unless compelling scientific evidence supports a different rating.

Park Area	NEPA Element	DEIS Adverse Impact Statement
Milagra Ridge	Soil	Minor
Mori Point	Soil	Moderate
Sweeney Ridge	Soil	Minor
Mori Point	Vegetation - Coastal communities	Minor
Milagra Ridge	Vegetation - Coastal scrub and chaparral	Minor
Mori Point	Vegetation - Coastal scrub and chaparral	Minor
Pedro Point Headlands	Vegetation - Coastal scrub and chaparral	Minor
Sweeney Ridge	Vegetation - Coastal scrub and chaparral	Minor

Coastal Wildlife

The DEIS provides no GGNRA measurements showing any impact of dog recreation and according to the response to my FOIA request there have been no wildlife inventories or monitoring since the 1990s. Obviously, the Park Service is not overly concerned that wildlife is declining in these areas. However, I know that there are some inventories and monitoring (e.g., raptors, Mission Blue Butterfly, Northern Spotted Owl, etc.) that the Park Service did not provide, which brings into question the credibility of the Park Service.

The Park Service provided no evidence of even a single wildlife disturbance by a dog in San Mateo County from 2001 to 2010. Even though I see some wildlife flushing occur just like with any human activity (e.g., ranger patrols, hiking, bicycling, equestrian, etc.), there is no evidence that these inconsequential and rare disturbances have any more than insignificant impact on the wildlife populations in these parks particularly in comparison to other visitors without dogs. Rabbits, ground squirrels, and birds are the most common animals along the trail bed and they flush off the trail or beach when a person, horse, bicycle, or vehicle passes. There is no scientific evidence that provides more than speculative evidence that dogs on-leash or off-leash have any significant impact on these wildlife above that of a hiker without a dog. In almost 50 years of living on a farm and regularly visiting parks, I've never seen a dog catch wildlife but I'm sure it happens on extremely rare occasions. Even if a dog once in a while catches a bird somewhere in the GGNRA, that is inconsequential in comparison to other activities that the Park Service sanctions such as fishing and hunting and inconsequential in comparison to the 80,000 acres and natural attrition and wildlife interactions.

Any disturbances are further minimized in the coastal scrub/chaparral areas by the denseness of the vegetation and the poison oak, which encourages owners to keep their dogs on the trail bed. All DEIS impact statements and justifications should be modified to indicate negligible impacts on from dog recreation on wildlife unless studies in the GGNRA provide evidence that adverse effects are more than speculative and negligible for these recreation areas.

Row Labels	Moderate Impact	Minor Impact
Milagra Ridge	1	
Wildlife - Coastal scrub and chaparral	1	
Mori Point	1	2
Wildlife - Coastal communities		1
Wildlife - Coastal scrub and chaparral	1	
Wildlife - Wetlands and open water		1
Pedro Point Headlands	1	
Wildlife - Coastal scrub and chaparral	1	
Sweeney Ridge	1	
Wildlife - Coastal scrub and chaparral	1	
Grand Total	4	2

Attachments:

Excerpts from the San Francisco Garter Snake 5-Year Review 2006, US Fish & Wildlife Service

http://ecos.fws.gov/docs/five_year_review/doc774.pdf

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Increased growth in the human population has also put greater pressure on land managers to provide recreational opportunities. Most recreational activities like hiking and jogging are not a threat to the SFGS. However, off-road vehicles (OHVs) and bicycle activity at the West of Bayshore site have killed snakes and degraded the habitat (Larsen 1994). OHVs have been used at Mori Point as well, which has led to the erosion and degradation of upland habitat for the species (D. Fong, pers. comm.). Unfortunately, efforts to limit OHV trespass on protected public and private land is difficult without adequate enforcement and regulation.

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The amount of illegal collection of the SFGS and its effect on the species is not clear. Several factors are believed to have contributed to a decline of these illegal activities at the West of Bayshore site in recent years. However, employees with the California State Parks continue to believe that unauthorized take remains a threat to the species (P. Keel pers. comm., J Kerbavaz pers. comm.).

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One of the greatest threats to the SFGS is the reduction of habitat quality resulting from the elimination of disturbance events throughout the Peninsula. Primarily, this is based on changes in management that encourage seral ecosystems. Other factors affecting the continued existence of SFGS include the increased presence of invasive species which can compete for resources with SFGS or hunt individual SFGS directly. Finally, lower level threats include reservoir topology and hydrology, vehicular strikes, hybridization with the RSGS, and interspecific competition with congeners (other *Thamnophis* species and subspecies). However, due to a continuing lack of accurate population estimates, the overall impacts of these events on the species remain unknown.

The persistence of seral ecosystems in protected regions of the Peninsula threatens the SFGS (H. McQuillen, pers. comm.; S. Larsen, pers. comm.). Dynamic grass-dominated uplands provide for, and are potentially maintained by, burrowing rodents (Stromberg and Griffin 1996) which create tunnel systems used by SFGS for hibernacula during the winter months (Larsen 1994, McGinnis *et. al.* 1987). The loss in recent years of ecological disturbance throughout the majority of San Mateo County has made it possible for brush species to dominate former grasslands, potentially precluding burrowing animals. Fire suppression has allowed for the domination of these woody species across the coastal landscape, limiting the extent of grasslands which were likely important movement corridors for populations of SFGS in their migrations between aquatic habitats (D. Hankins, *in litt.* 2006). Additionally, the loss of traditional grazing practices on public lands has allowed for the accumulation of dense brush-dominated canopies across the remaining grasslands which may decrease habitat suitability for the



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Several State and Federal laws currently protect the SFGS and its habitat. Despite these protections illegal collection may be continuing in California state parks and other easily accessed areas. To minimize these unauthorized collections, the Service should encourage additional law enforcement at sensitive sites.

Example of Enabling Legislation Allowing Hunting – A significant wildlife disturbance

<http://www.nps.gov/chic/planyourvisit/hunting.htm>



NPS/CHICKASAW NATIONAL RECREATION AREA

On the hunt.

Hunting is a permitted use under the enabling legislation for Chickasaw National Recreation Area (P.L. 94-235, §3). The legislation also provides for the designation of zones and periods when no hunting is permitted for reasons of public safety, administration, wildlife management, or public use and enjoyment.

A variety of game including quail, turkey, squirrel, rabbit, dove, ducks, geese, and deer may be found here. However, due to the small size of the area and heavy hunting pressure, success is limited. **Trapping is prohibited.** All deer and turkey taken within the Chickasaw National Recreation Area must be checked-in at the nearest certified Oklahoma Game Check Station.

>60 National Park Service Ran Parks Allow Hunting

<http://www.nps.gov/findapark/index.htm>

Advanced Search by activity, Hunting

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		Bighorn Canyon

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Highlights of Relevant Personal Background

- Lived in the Bay Area for 17 years and am an avid outdoors and nature lover that has frequented many National Parks, National Forests, and most of the parks in the Bay Area. Before Ella, a dog, joined the family, I visited National Park Service parks including Yosemite, Yellowstone/Grand Tetons, Lassen, Glacier, Grand Canyon, Redwood, Point Reyes, Pinnacles, Zion, Bryce, Death Valley, Canyonlands, Channel Islands, Denali, Dinosaur, Sequoia/Kings Canyon, Mesa Verde, Muir Woods, Natural Bridge, Padre Island, Rocky Mountain, and SF Maritime. Since Ella joined the family, we have not been to a park, other than the GGNRA, that is managed by the National Park Service because dogs are not allowed beyond the main park corridor (e.g. the campgrounds and parking lot and superficial trails). Not being able to visit the National Parks is one of the hardest things about having a dog as a part of the family.
- Frequent the GGNRA dog-friendly sites almost daily for 5 years since Ella, an Aussie, joined our family with most GGNRA visits to Sweeney Ridge, Mori Point, Fort Funston, and Milagra Ridge. Before getting Ella, Sweeney Ridge was the only one of these GGNRA sites that I had visited more than once in 12 years in the Bay Area. Instead we tried to always go to new open spaces during our weekend hikes with Sweeney Ridge and Sawyer Camp / San Andreas / Canada Road trails being standard hikes/runs/bike that we did 4 or 5 times a month. We also had gym memberships which we no longer have since we can't exercise Ella and go to the gym. We find hiking so much more rewarding with Ella; we interact with so many more people because having a dog, like having a small child, facilitates social interactions that rarely happened without a dog
- Spent the past four months canvassing the GGNRA and other dog-friendly locations talking to people with dogs and raising awareness of the GGNRA plan. This included many discussions regarding the experiences and needs of people with dogs
- Co-author of the SaveOffLeashDogs Call to Action weekly email regarding the GGNRA dog management plan and active member of the SaveOffLeash coalition with primary responsibility for grass roots organizing for San Mateo County, SFDog, and Ocean Beach Dog
- Member of the Peninsula Australian Shepherd Club, the Australian Shepherd Club of America, Ace Dog Sports, and the Bay Team (an agility organization)
- Over 20 years of experience as an auditor in public accounting firms and corporations and a Masters in Accounting Information Systems and a Bachelors in Agricultural Economics/Accounting
- Graduate of the SF SPCA Dog Training Academy, a six week intensive program taught by Dr. Jean Donaldson, a nationally recognized dog behaviorist
- SFSPCA volunteer trainer responsible for addressing more significant behavioral issues such as reactivity, fear, rude behaviors, and puppy socialization
- Grew up on a farm with a virtual zoo of animals related to this plan including dogs, horses, mules, deer, quail, geese, and ducks and in a rural areas with significant wildlife populations
- Read the 2200 Page DEIS and visited all but 3 of the 21 sites included in the plan plus visited the new lands at Rancho Corral de Tierra in Montara
- Analyzed the 2001 to 2010 GGNRA Law Enforcement Access data headers and the 2007 to 2008 pet-related cases in the ranger/USPP detailed description PDFs

- Reviewed the available GGNRA inventories and monitoring reports provided by the GGNRA related to a Freedom of Information Act request
- Rely on the GGNRA for daily walks to help prevent morbid obesity, diabetes, heart disease, and breast cancer , which is prevalent in my family as well as stress relief
- Rely on GGNRA to responsibly care for Ella, our dog, and for ensuring that she is a healthy and safe dog for the community and for those visiting our home
- Committed environmental advocate for addressing real issues that make the world a healthier and happier place for all our interconnected beings. Member of the Sierra Club