

May 26, 2011



Frank Dean, General Superintendent
Golden Gate National Recreation Area
Fort Mason, Bldg. 201
San Francisco, CA 94123

Dear Superintendent Dean:

The Marin Conservation League supports the need for GGNRA to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park. The Plan and DEIS have been closely reviewed by MCL's Parks and Open Space Committee and their recommendations have been affirmed by the MCL Board.

While we understand the need for consistent policy throughout the park, we have focused our comments on how the various alternatives might apply to seven sites identified in Marin County: Stinson Beach, Homestead Valley west of Mill Valley, Oakwood Valley/Alta Trail, Muir Beach, Rodeo Beach, Marin Headlands, and Fort Baker.

1. In general, Alternative D, the environmentally preferred alternative, provides the greatest protection for natural resources and safety. At the same time, we recognize that all of the "action" alternatives (i.e., B, C, D, and E) increase restrictions on dog walking over the existing condition. Therefore, we concur with the NPS' selection of the Preferred Alternative "C" for all but one of the seven sites in Marin. The exception is Muir Beach (see Comment 2, below). Alternative C would allow only two off-leash areas (ROLAs) in Marin County – one on Oakwood Valley Fire Road, and the other at Rodeo Beach on the northern portion of the beach.

Alternative C represents an appropriate compromise between protection of the environment and an attempt to accommodate dog walkers—at least as an experiment! The effectiveness of Alternative C in reducing user conflicts and enhancing safety of users and dogs will depend heavily on the combination of responsible observance by dog walkers and enforcement of regulations by GGNRA. Because neither of these can be assured, adoption of this alternative should be conditioned on establishment of a "sunset" date no later than five years from adoption, for review of the Plan's effectiveness based on systematic monitoring of user compliance (See Comments 4 and 5).

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2. We agree that Alternate D, the environmentally preferred as well as NPS preferred alternative for Muir Beach, is appropriate for that site, especially in view of recent habitat restoration at the mouth of Redwood Creek. Dogs would not be allowed on the beach at all. Applied to this environmentally sensitive area, this restriction should minimize the common temptation of dog walkers in an area where dogs are allowed on leash, to choose to ignore the limitation. The NPS can expect strong pressure from the Muir Beach dog community, however, to allow an unfenced ROLA on a portion of the beach, as is proposed in Alternative E.

3. The ROLA proposed for the Oakwood Valley Fire Road will be fenced along the sides, as well as gated at both ends. Hikers will share the fire road with off-leash dogs. We have several concerns about this proposal. First, it is not clear where the fencing would be located – adjacent to the fire road or at some distance? In either case, if fencing is effective to contain dogs it will also interfere with free passage of wildlife across the valley. Second, it is not clear how the proposed ROLA will affect other users – hikers, equestrians, and bikers. Oakwood Valley Fire Road is currently used by all three, and the almost parallel Trail is used by hikers and dog walkers only. It is closed to bikes and not usable by equestrians because of a narrow and unsafe bridge and steps at one end. If the proposed ROLA on Oakwood Valley Fire Road is closed to horses, equestrians will lose access to Oakwood Valley. While this road is not heavily used by horses, it is used by riders from Horse Hill. Also, if the ROLA is closed to bikes, this would force mountain bikers onto Oakwood Trail, making that trail unsafe for hikers. Resolution of these potential problems will require more study.

4. The proposed Compliance-Based Management Strategy will be based primarily on monitoring and recording the behavior of users by observation, but the Plan does not include a detailed monitoring plan. The Draft Plan establishes 75% as an acceptable level of compliance. However, the management response (i.e., changing ROLAs to on-leash areas, and “on-leash” to “no dogs”) would not be implemented unless the compliance rate dropped to 25%. Given the size of GGNRA, the limited number of personnel, and this inexact measure of compliance, it will be difficult to develop an adequate monitoring plan. Implementing the monitoring plan in a way that produces reliable results and is legally defensible will be even more difficult. Particularly in

ROLAs, the assessment of compliant “voice control” will require nuanced measures. The Plan and EIS must assure the public that compliance will be consistently monitored by establishing defensible, understandable, easily measured, and enforceable standards and metrics.

5. Finally, the Compliance-Based Management Strategy proposed by GGNRA needs to be supplemented, from the beginning, by vigorous enforcement efforts that include (a) a visible increase in uniformed law enforcement presence; (b) increased issuance of citations, particularly to aggressive violators; and (c) tracking of repeat offenders. It seems clear that GGNRA plans to minimize issuance of citations “for safety reasons . . . it is assumed by staff that any contact with a dog owner regarding dog walking regulation compliance will be confrontational, and it is the park’s goal to reduce the number of these conflicts.” (Draft Plan/EIS page 286-287) Nonetheless, we agree with others that enforcement of regulations sends the clearest message to people about what is expected of them. Clear, unambiguous, and prominent signage is most important. Signs that are vandalized need to be replaced quickly and persons caught vandalizing signs should be prosecuted vigorously.

We appreciate the Park’s efforts to inform and engage the public in this difficult task, and look forward to your responses.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nona Dennis".

Nona Dennis
Vice President