

February 18, 2014     **[Revised from earlier letter]**

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



**Re: GGNRA Dog Management Plan and DEIS [Revised comments]**

Dear Superintendent Dean:

The Marin Conservation League previously commented in 2011 on GGNRA's Plan to provide clear, enforceable policies to determine the manner and extent of dog use in various areas of the park. On the basis of information in the Plan and DEIS, we concurred at that time with the NPS selection of the Preferred Alternative for all seven sites in Marin, as a reasonable compromise between the Environmentally Preferred Alternative "D" and the other "action" alternatives.

We have a similar response to the revisions in the Draft Supplemental EIS: We support the National Park Service's (NPS) Preferred Alternative "F", with one exception – see Muir Beach below), in that it balances the need to protect natural and cultural resources and ensure visitor safety with the designation of appropriate areas in the Park for no dogs, or dogs on- and off-leash. We are fully aware of the potential for adverse effects of large numbers of dogs caused by trampling vegetation, depositing dog waste, and adding nutrients. Such degradation of high quality habitat can result in displacing wildlife from preferred habitats, with eventual loss of species from the area. For each of the seven sites in Marin, the Draft SEIS identifies sensitive species, habitats, and/or cultural resources that may be threatened by dogs and has recommended an appropriate response. Therefore, where a choice must be made between allowing dog access and protecting native wildlife, endangered species or sensitive vegetation, the Draft SEIS tips the balance toward protecting the resource. We believe that this approach accommodates a variety of recreational experiences, both with and without dogs, while ensuring that these resources are protected for future generations.

Other comments are as follows:

1. Under Alternate F, the NPS Preferred Alternative for Muir Beach is generally appropriate for that site to protect the restored habitat at the mouth of Redwood Creek and several sensitive species. The Preferred Alternative in the Draft Supplemental EIS allows access for dogs on leash on the beach. MCL believes that an unfenced ROLA should be designated on the southern portion of the beach. This provision would still ensure protection of sensitive resources and at the same time offer a practical solution to dog-owning residents of Muir Beach who have long-frequented the beach. The large expanse of Rodeo Beach provides that opportunity, but it is distant from Muir Beach.
2. The on-leash access proposed for the Oakwood Valley Fire Road under Alternative F would remove the fence and gates proposed for the fire road and thus remove a barrier to wildlife movement. Hikers, bikers, and equestrians will share the fire road with on-leash dogs. The Fire Road is currently used by all three, and the almost parallel Trail is used by hikers and dog walkers only. That trail will be closed to dogs under Alternative F from Tennessee Valley Road to the junction

PHONE: 415.485.6257  
FAX: 415.485.6259

EMAIL: [mcl@marinconservationleague.org](mailto:mcl@marinconservationleague.org)  
WEB: [marinconservationleague.org](http://marinconservationleague.org)

ADDRESS: 175 N. Redwood Dr., Ste. 135  
San Rafael, CA 94903-1977



with the Fire Road, and thereafter open to dogs on leash to the junction with the Alta Trail. We agree with this approach, which will keep dogs off the lower wooded section of the Trail.

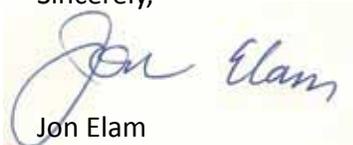
3. MCL also agrees with Alternative F's general approach to trails in the Marin Headlands, which is to allow on-leash dog access on the perimeter of the area, while protecting the integrity of wild inner portions frequented by coyote, bobcat, and other wildlife with large territories and need of protections. This approach safety also enhances visitor safety.

4. The revised Monitoring-Based Management Strategy is less rigid than the previous compliance-based strategy, which did not consider the trail context. Nonetheless, given the size and diverse conditions of GGNRA and a limited number of personnel, the Monitoring-Based Management Strategy needs to be supported by clear standards and vigorous enforcement that includes (a) visible increase in uniformed law enforcement presence; (b) increased issuance of citations, particularly to aggressive violators; and (c) tracking of repeat offenders. We agree with others that enforcement of regulations sends the clearest message to people about what is expected of them. Clear and prominent signage is also important.

Finally, the effectiveness of Alternative F in protecting resources and enhancing safety of visitors and dogs will depend heavily on the combination of responsible observance by dog walkers and enforcement actions taken by GGNRA. Because neither of these can be assured, adoption of this alternative should be conditioned on establishment of a date-certain to allow for review of the Plan's effectiveness based on monitoring of user compliance.

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

Sincerely,



Jon Elam  
President



Nona Dennis  
Chair, Parks and Open Space Committee

cc: Supervisors Kate Sears, Steve Kinsey, Susan Adams, Katie Rice, Judy Arnold; Congressman Jared Huffman; Linda Dahl, Marin County Parks Department