

January 12, 2014

Honorable Sally Jewell
Department of the Interior
1849 C Street, N.W.
Washington DC 20240



Dear Secretary Jewell:

We are writing to seek your engagement in the development of the Golden Gate National Recreation Area Dog Management Plan because the GGNRA does not appear to be listening to the widespread concerns being expressed throughout the San Francisco Bay Area. Recently, Democratic Leader Nancy Pelosi, Congresswoman Jackie Speier, and San Francisco Mayor Ed Lee have publicly noted problems with the planning process and expected adverse impacts if the plan is implemented as proposed. In October 2013, the San Francisco Board of Supervisors unanimously passed a resolution opposing the plan and called on the GGNRA to take a different approach to allow continued access for people with dogs in these recreational areas.

As you know, the GGNRA released their Draft Environmental Impact Statement for the Dog Management Plan in 2011. People submitted thousands of comments, with the overwhelming majority against the plan. The public and NEPA experts identified serious scientific and technical errors. When the GGNRA subsequently announced that they would release a Supplemental EIS to address these concerns and suggestions, we expected substantive changes. We were deeply disappointed that in September 2013, after two years of review, the GGNRA released a supplemental plan that is essentially identical to the original draft with only minor changes.

The GGNRA plan severely cuts or entirely bans where people with dogs, who have been welcomed together in these areas for decades, will be able to walk in the future, without offering any evidence to prove the need for such dramatic changes. This supplemental plan, like the draft before, lists impacts and damage that “could,” “may,” or “might” happen, but offers no scientific evidence that those impacts have actually occurred in the GGNRA or are occurring now. Moreover, the GGNRA has not conducted the site-specific, peer reviewed studies required to justify and guide such broad proposed changes in managing this urban recreation area.

Despite a formal request made by the City of San Francisco in March 2011, the GGNRA plan still does not adequately consider the potential impacts it likely will have on surrounding city parks if people with dogs are forced off of GGNRA land. There is also a disturbing provision in the GGNRA plan about compliance that allows the GGNRA to unilaterally make additional closures without providing meaningful descriptions of the conditions and metrics that would warrant such actions; these changes in use would not be subject to a requirement that public review and input be obtained. Any compliance-based plan needs to be adequately developed with sufficient detail to enable meaningful public comment.

Currently, people with dogs are only allowed on less than 1% of the 80,000 acres that comprise the GGNRA. The proposed plan will cut that access by 90%, or put another way, people with dogs will be denied access to 99.9% of the GGNRA. We are troubled that this plan fails to manage the GGNRA for the recreation needs of the people of the Bay Area, in direct contradiction to its 1972 enabling legislation, and incorrectly treats the GGNRA as if it were remote wilderness, when it’s actually located within a large and heavily populated major urban area.

During your Commonwealth Club speech in San Francisco in November 2013, you spoke quite eloquently of your desire to get people, especially children, actively engaged with and visiting our national parks and national recreation areas. Dog walking is a well-established way of accomplishing exactly that in the GGNRA for adults, children and seniors. You also spoke about the need for Department of the Interior units, such as the GGNRA, to work closely with nearby cities. We believe the GGNRA management needs to begin working with its city partners in Marin, San Mateo and San Francisco counties to develop a fair and balanced dog management plan that does not unduly restrict dog recreation.

We are not asking for unlimited dog walking access and we advocate responsible dog ownership in all GGNRA lands. But there is no credible reason to deny fair and reasonable access for both on- and off-leash dog walking that has taken place on GGNRA land for more than 50 years. We would very much appreciate meeting with you and your staff in Washington or the Bay Area to discuss our concerns and find constructive solutions to resolve them. Thank you for your consideration.

Sincerely,

Crissy Field Dog Group
DogPAC of SF
Fort Funston Dog Walkers
Keep Muir Beach Dog Friendly
Marin County Dog
Marin Humane Society
Marin Pet Care Association
Montara Dog Group
Muir Beach Community Services District
Ocean Beach Dog Owners Group
San Francisco Dog Owners Group
San Francisco Professional Dog Walkers Association
San Francisco SPCA
Save Offleash Dog Walking in the San Francisco Bay Area

Attachments:

Congresswoman Jackie Speier letter to DOI, June 19
Congresswoman Nancy Pelosi letter to GGNRA, Dec. 3
San Francisco Board of Supervisors resolution, Oct. 29
San Francisco Mayor Ed Lee comment, San Francisco Examiner, Dec. 18
San Mateo County Supervisor Don Horsley letter to GGNRA, Oct. 21

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