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**Cc:** [chris\\_lehnertz@nps.gov](mailto:chris_lehnertz@nps.gov); Don Horsley; (b)(6); (b)(6); [Rill Katrina](#)  
**Subject:** GGNRA General Management Plan  
**Date:** Friday, December 19, 2014 11:00:28 PM  
**Attachments:** [GMP comments.pdf](#)  
[BOS Letter.pdf](#)

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Dear Frank,

I am writing to follow up on the telephone conversation last July between you, myself, Chris Lehnertz and Martha Walters. During that conversation Martha and I pointed out serious flaws in the GMP and requested that the sign-off on the GMP be delayed until those flaws are addressed. As you know, this important document will replace the original GMP from 1980 — 34 years old! It is prudent to delay the new GMP a little while longer, if necessary, to “get it right.” Below are some of my specific concerns:

On November 24, 2011, I submitted comments on the draft GMP on behalf of the Montara Dog Group (MDG). That submittal was not recognized in the final GMP, even though submittals from other dog groups were identified (Crissy Field Dog Group and San Francisco Dog Owners Group) in the final GMP, Vol. II, p. 391. MDG represents over 400 San Mateo County residents who participate in recreational dog walking on GGNRA lands. Our voice needs to be heard. The body of my comments on the draft GMP are attached, and I will be happy to provide the additional attachments if requested.

In those comments I had two major concerns; one was the lack of coordination between the GMP and the incomplete Dog Management Plan (DMP). The GMP presupposes conclusions from the still incomplete DMP, thus compromising the NEPA process for both documents. In addition, the NPS will soon be doing a "Trail Management Plan" and "Master Plan" for the *Rancho Corral de Tierra* unit of the GGNRA. We are being planned to death! Why cannot all of these plans be coordinated?

The other main concern had to do with the “Park Purpose.” I realize that the NPS has a mandate to “conserve park resources and values” and well as to provide for “the enjoyment of park resources and values by the people of the United States.”

The GMP treats these goals as being mutually exclusive, when they are not. The GMP (and DMP) are much more restrictive on recreational uses of the GGNRA than is necessary to conserve park resources.

When the final GMP/EIS was issued it was stated on the GGNRA web site that “there is no comment period.” In the abstract of the final DMP, however, it states that the final GMP/EIS “has been distributed to other agencies and interested organizations and individuals for their review and comment.” MDG is definitely an “interested organization,” but we did not receive a copy of the final DMP/EIS for comment.

As you are probably aware, our elected representatives here in San Mateo County — Congresswoman Jackie Speier and County Supervisor Don Horsley, have also expressed concerns about proposed GGNRA policies in this county. A letter from the San Mateo County Board of Supervisors is attached.

Finally, I do not feel that the outreach to the public was adequate for the GMP. One meeting

in January, 2009, was billed as a “workshop,” where after numerous speakers expressed concern about restrictions on dog walking, and after a petition with 130 signatures was presented, we were told that dog walking was not going to be considered in the GMP. The only other meeting was billed as a drop-in open house in Pacifica in September 2011. I do not feel that either of these events satisfied the criteria for formal public hearings appropriate for a document as important and far reaching as this GMP.

If the NPS plans to revise the final GMP based on comments received subsequent to the release of that document, I think that it would be appropriate to provide the public with an opportunity to review the revisions. If the revisions are substantial, a supplemental EIS should be considered.

Yours truly,

Bill Bechtell

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