

FYI

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Latest from Ash

Sent from my iPhone

Begin forwarded message:

Dear Horst and Ted,

The GMP was released in final form last month and will become effective in approximately two weeks. However, the proposed final GMP has created a very significant NEPA issue for the DMP. My client the Crissy Field Dog Group was very troubled to see that the GMP, on its face, prejudices the outcome of the DMP by designating the vast majority of the GGNRA as a "natural" area management zone -- thereby strongly discouraging (if not outright banning) most forms of recreation, including dog walking, in these areas over the long term, substantially limiting consideration of DMP alternatives. The DMP is not anticipated to be released until 2015, but the GMP has already labelled most of the GGNRA as all but off-limits to dog walking. In addition, the GMP's recreation areas correspond directly with the DMP preferred alternative's off-leash dog recreation areas. This violates the prohibition on decision-making that would limit the scope of reasonable alternatives prior to completion of the DMP NEPA process, 40 CFR 1502.4, because the GMP forecloses DMP alternatives. While there is boilerplate "savings" language in the GMP, claiming that the GMP does not apply to dogwalking, the language allows that GGNRA "could" only make "minor" revisions to the GMP after issuance of the DMP to render the two documents consistent (GMP at I:34). Based on this language, it is apparent all the major issues have already been resolved with respect to the DMP -- well before completion of the DMP NEPA process. My client is extremely concerned that the GGNRA's process has violated NEPA by prejudging the outcome of the DMP.

[illegible]

The above maps should be contrasted with the no-action alternative in the DMP, which would allow continued off-leash dog use throughout Fort Funston (red area below):



I have spoken with each of you separately in the past about my client's concerns, but unfortunately these concerns have only grown over time as the process has gone on. I greatly appreciate all the attention you have given to this important issue of recreational management of the GGNRA, the primary public open space in San Francisco, Marin and San Mateo Counties.

I am available to discuss any questions you may have. Thank you again for your attention to this process.

Ash Miller



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