

From: (b)(6)
To: Chris_Lehnertz@nps.gov; Karen_Washington@nps.gov
Subject: Do not sign the GGNRA GMP --and here's why
Date: Tuesday, May 27, 2014 8:06:02 PM

To: Christine Lehnertz

I am submitting this email to you on behalf of the San Francisco Dog Owners Group (SFDOG), the largest dog group in San Francisco that represents thousands of dog owners and guardians.

The GGNRA has sent a proposed new General Management Plan to you for your signature, as well as a Professional Dog Walker Permit, both of which could go into effect at any time upon your signature. Please do not sign either. Send them back to the GGNRA for more public input. Indeed, there is no need to rush on either plan. The NPS needs to take the time to do these plans right, rather than force them through in record time.

The proposed General Management Plan had very little public vetting, especially considering its proposal to radically change the management of GGNRA land, removing recreation as an important value for the lands. This proposed GMP does not conform to the enabling legislation that made clear that recreation is an important value in managing the land. The NPS cannot impose by administrative fiat such a radical change on the people of the Bay Area who supported the creation of the GGNRA in 1972. If the proposed GMP goes into effect, you can expect lawsuits, extremely bad publicity and general anger at the "bait and switch" done by the NPS -- the NPS said: give the NPS your land to manage and we promise we will respect and maintain recreational access, managing the land as an urban recreation area, then once the land is given to the NPS, we're told it must be managed as a remote, pristine wilderness like Yosemite and therefore active recreation is no longer important. The GGNRA is singlehandedly changing people's perspectives of the NPS, and not in a good way. It's almost as if the GGNRA wants to be hated. Well, they're doing a good job of getting there.

When the current GGNRA General Management Plan was created in 1980, the GGNRA Citizens Advisory Committee (CAC) held five public hearings to gauge public response to various proposed alternatives. They then held five additional public hearings after the Draft GMP was released. The CAC then prepared ten committee reports suggesting modifications to the Draft GMP. These reports "resulted from an exhaustive page-by-page review and analysis of the draft plan by the committees prior to the public hearings. Subsequent to the hearings, two staff reports were submitted to the full commission responding to relevant issues and questions raised by the public in both written and verbal testimony." (1980 GMP, p. 15). The final GMP adopted by the GGNRA in 1980 incorporated all of the modifications suggested by the CAC, as well as "numerous other specific changes requested by the public during the public hearings and review period" (1980 GMP, p. 15). The level of public process was extensive in 1980 and resulted in a GMP that the public accepted and backed.

By contrast, the public process behind the new proposed GMP has been wholly inadequate. Notices of the Draft GMP were NOT posted in locations with large numbers of visitors, e.g., Fort Funston or Crissy Field. When private citizens posted notices to let people know what was going on, those notices were removed. The GGNRA conducted NO public hearings on the Draft GMP. Instead, three public open houses were held -- just 3, compared to the 10 public hearings, and 10 committee reports in 1980. Open houses are not an adequate substitute for a

public hearing. During a public hearing, people can hear what others have to say and that can, in turn, influence their own comments. This sharing of ideas is not possible during open houses, where people are isolated as they talk one-on-one with a single GGNRA staffer. Compare this to the ad campaign for a recent "Bio Blitz" held in the GGNRA. The GGNRA posted flyers throughout its lands, ads were placed in newspapers and on TV. But when it came to significantly changing the way the GGNRA proposed to manage its lands, there was nothing posted and no ads anywhere. Nothing. Nada. Zilch.

Despite this inadequate public process, I submitted a public comment on the Draft GMP as representative of SFDog, representing thousands of dog owners in San Francisco and the Bay Area. Yet not a single point that I made was considered in the Final GMP. It was as if my comments were completely ignored, as were those of anyone who opposed any aspect of the Draft GMP. This is NOT public process. This is the GGNRA imposing an unpopular management policy on the people of the Bay Area whether they like it or not. And mostly they do not like it.

Some 500 comments were received on the Draft GMP. That is a paltry sum. There is no way that the GGNRA can claim that they have received the support of the people of the Bay Area for their proposed changes to the way they manage their land. You need to send the GMP back to the GGNRA and require a robust public process to properly and publicly vet their proposed changes, a process more like the one done in 1980.

I will not quote you the many places in the GGNRA's enabling legislation and the legislative record that define recreation as an important value for the GGNRA, indeed perhaps the most important one. Here are but a few:

- "In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space... the [GGNRA] is hereby established." (GGNRA enabling legislation, PL-92-589)
- "This legislation will ... [establish] a new national urban recreation area which will concentrate on serving the outdoor recreation needs of the people of the metropolitan area." (H.R. Rep. No. 1391, 92nd Congress, 2nd Session, 1972)
- "Action is required if ... the relatively natural areas within the city are to be available to satisfy the growing need for outdoor recreational opportunities." (H.R. Rep. No. 1391)

A General Management Plan is required to adhere to the enabling legislation and legislative history when an area was created. Here are a few comments from the 1980 GMP, indicating the 1980 GMP understood the recreational purposes behind the creation of the GGNRA:

- "The planned uses of the resources are primarily for recreational activity, consistent with the reasons for establishment of the areas." (1980 GMP, p.189)
- "Because most visitors will continue to be local people, there will be a basic orientation to residents of the Bay Area and their needs for cultural expression, socializing, physical exercise, and the whole variety of daily leisure experiences." (p. 23)
- "Restoration of historic natural conditions (such as the reestablishment of Tule elk) will continue to be implemented when such actions will not seriously diminish scenic and recreational values." (p. 96)
- "The park will provide recreational experiences for a wide variety of users." (p. 128)
- "The plan was shaped by careful attention to both existing uses and public demand for

new activities." (p.128)

The 1980 GMP makes it clear that the GGNRA is not pristine wilderness. For example, the 1980 GMP describes the Natural Appearance Subzone at Ocean Beach and Fort Funston as:

- "To many park users lands in this sub zone may appear to be as natural as wilderness areas at Point Reyes, but they are in fact man-created landscapes which in many cases will require the same degree of maintenance as an urban park setting." (1980 GMP, p.17)
- "In fact, the park characteristics we enjoy today and perhaps assume to be natural are, in most cases, the result of some degree of human intervention with natural processes. Most of the trees at Baker Beach and Lands End, for example, were planted by the army, and the steep open grasslands so characteristic of coastal Marin may have been in some measure perpetuated by livestock grazing." (p. 95)

Consider also how the 1980 GMP says Ocean Beach and Fort Funston should be managed:

- "The primary management goal in these areas will be to continue to accommodate relatively high use levels with a commitment to intensive maintenance in order to retain the appearance of a natural landscape." (1980 GMP, p.17)

All of this makes sense. According to the 1980 GMP, the GGNRA is not a pristine wilderness; it is, in fact, an urban recreation area, more akin to an urban city park than wilderness like Yosemite.

Imagine our surprise when the new proposed GMP turns that completely on its ear -- 90% of the GGNRA will be managed as "natural zones", which the new GMP defines as akin to pristine wilderness with low visitor use, not man-created landscapes with high visitor use:

- "Natural resources would be managed to preserve and restore resource integrity while providing for backcountry types of visitor experiences." (new proposed GMP Vol. I, p. 15)
- "Visitor use would be managed to preserve resources and their associated values and could involve controlled access." (p. 15)
- "...areas where they could experience natural sounds, tranquility, closeness to nature, and a sense of remoteness and self-reliance. Visitor use would be controlled..." (p. 17)
- "Low to moderate visitor use would be expected in this zone.." (p. 19)

Here is how the proposed GMP will manage 3/4 of Ocean Beach:

- "The area would be managed to protect shorebirds and threatened species..." (new proposed GMP, Vol. I, p. 43)

Clearly, the new proposed GMP will radically change the management of the GGNRA. Such radical change cannot be imposed on the people of the Bay Area. The GGNRA **MUST** conduct a robust public process to generate a new GMP to generate public support for any plan. Because that was not done and public support is severely lacking, you cannot sign the proposed GMP and let it go into effect. Please send it back to the GGNRA for a robust public process. The GGNRA must actually **LISTEN** to what the public say, not merely ask for public comment and then ignore what they are told.

Actually, I don't think that the GGNRA can legally implement a GMP while a significant part of it (the Dog Management Plan) is still being developed. As it stands now, if the GGNRA wants to increase where people with dogs will be allowed to walk either on- or off-leash in its Final Dog Management Plan (compared to the Supplemental Plan), the proposed GMP may prohibit that increase because the areas will be designated as "natural zones" where dog walking will not be allowed. The GMP presupposes the results of the Dog Plan, and the Dog Plan presupposes that the GMP is adopted. This cannot be allowed to stand. At the very least, it will result in increasing unpopularity of the GGNRA and its management, which will be applied to unpopularity of the NPS and its mission, and at its most could result in years of litigation, all of which will only cause more and more bad feelings toward the GGNRA and the NPS.

Finally, the Draft and Supplemental Dog Management Plans included a permit process for professional dog walkers. The GGNRA announced a month ago that they would institute a professional dog walker permit now, pulling it out of the NEPA process for the Dog Management Plan. That's not legal. You cannot decide by administrative fiat to implement a single portion of a plan undergoing environmental review under NEPA before that process is completed. Again, the GGNRA management is setting up the NPS for lawsuits, bad publicity, and the anger of the public.

Please do not sign either the new proposed GMP or the professional dog walker permit and please do not allow either of them to go into effect now. Please return them to the GGNRA and ask that they conduct a robust public process to find out what the people really think about both (and also about the Dog Management Plan), and then that they honestly consider and respond to the comments they receive.

Sally Stephens

Chair, San Francisco Dog Owners Group

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