

## **Myths and Facts About the GGNRA Dog Management Plan**

**MYTH:** The National Park Service is trying to ban dogs from the GGNRA.

**FACTS:** The proposed Dog Management Plan is designed to accommodate dogs in the national park while protecting people, our pets, and wildlife. Dogs will be allowed on-leash throughout much of the park and several, large off-leash areas are being created for dogs and their owners to enjoy.

Under the plan, only one trail, the Batteries to Bluffs trail in the Presidio, will not allow dogs. Other than that exception, people can walk with their dogs on leash within or adjacent to every single wild land and conservation area in San Francisco.

This policy is more accommodating to dogs than any other park in the National Park system and is consistent with every other land managing agency in the region, including San Francisco Recreation and Parks Department, California Department of Parks and Recreation, Marin Municipal Water District, Marin Open Space District, and California Department of Fish & Game. Like these agencies, the Park Service is trying to balance the needs of people, pets and wildlife in a high density, urbanized environment.

**MYTH:** The Preferred Alternative will severely restrict dog use within the GGNRA.

**FACT:** Within the GGNRA, there are a total of 115 miles of recognized walking and hiking trails. The Preferred Alternative would allow 31 miles of these trails for dog walking use (27%). In Marin County alone, there are over 440 miles of on and off leash dog recreational trails. There are also local off- and on-leash alternatives for dog walking, including more than 30 dog parks in San Francisco alone.

**MYTH:** The GGNRA is a safe place to let dogs roam off-leash.

**FACT:** The GGNRA is often not a safe place to walk dogs off-leash. Over the past 30 years, many dogs have been lost, injured, or killed, likely because voice control is not an effective means to protect pets from getting lost or hit by cars. The Park Service has also identified that dogs, especially off-leash dogs, pose health and safety risks to other dogs, park visitors, and park employees.

**MYTH:** The DEIS will restrict dog walking in GGNRA to such a high degree, that there will be nowhere for dog recreation within the city.

**FACT:** The City of San Francisco has 28 off-leash dog parks in 47 square miles for over 800,000 residents. This is more off leash dog parks than Los Angeles, Boston, Chicago, Miami, Denver, and Sacramento combined, and nearly ten times more per capita than New York City. San Francisco continues to add dog parks as well. Moreover, because the proposed policy offers extensive on- and off-leash dog recreation in the GGNRA, there is no evidence that dog owners or dogs will lack for open space to recreate.

## **Myths and Facts About the GGNRA Dog Management Plan**

**MYTH:** Since GGNRA is a national recreation area it has different management policies than National Parks.

**FACT:** No, all units of the National Park System are managed as one, regardless of title. “National Recreation Areas” were names given to parks either in or near urban areas as part of the “national parks to the people” movement in the early 70s. The GGNRA was properly suited for this designation, providing habitat for more threatened and endangered species than Yellowstone, Yosemite, Sequoia and Kings Canyon national parks combined. It is a world-class repository and it boasts the second-largest archival and museum collection in the National Park System, which tells the the cultural and historical story of the area.

**MYTH:** The City of San Francisco can take back the lands it gave to the GGNRA since the Park is not abiding by the original intent.

**FACT:** The agreement called for the lands to be used for recreation. See below for a long list of recreational activities at GGNRA. Furthermore, it would take an act of the US Congress to accomplish giving them back to San Francisco (as opposed to San Francisco “taking” them back).

**MYTH:** The Snowy Plovers and other wildlife at Crissy Field and Ocean Beach are not affected by dogs off-leash.

**FACT:** Plovers and other birds are often disturbed by dogs, which they see as natural predators, and disturbance triggers reactions that can lead to death of these birds. Disturbance of wildlife by dogs has been recorded within the GGNRA and documented in several published studies and reports, many of which are cited in the Draft Dog Management Plan DEIS.

When considering dogs’ impacts on wildlife, it is important to remember that most shorebird species in North America are suffering population declines, in large part due to loss of habitat and disturbance. Just as dog owners want to be good guardians for their pets, we all share the responsibility of being good stewards for wildlife and their habitats. That responsibility means we all must accept reasonable regulations of our recreational activities where they result in impacts to wildlife and habitats.

**MYTH:** The Golden Gate National Recreation Area has recently shifted away from providing recreation and instead focuses more on conservation to the exclusion of recreational activities.

**FACT:** Many, many recreational activities occur with the GGNRA, including bicycling, horseback riding, bird watching, jogging, hiking, boardsailing, hang-gliding, fishing, surfing, soccer, picnics, and volunteer habitat stewardship. Many of these activities do not conflict with one another, but not all of these activities are compatible with one another, nor are many of them directly compatible with off-leash dog walking. Balance is essential to provide access to all user groups, not just people who have dogs.

# DOG MANAGEMENT IN THE GOLDEN GATE NATIONAL RECREATION AREA

## Do Dogs Really Have Impacts on Park Users, Wildlife and Habitats?

Yes! The effects of dogs and dog-related recreation on park users have been very well documented, including:

- Attacks on park users,<sup>1</sup> other dogs<sup>2</sup> and wildlife<sup>3</sup> have been documented for years in the GGNRA.
- Asian and Latino park users report that they are less likely to visit parks for fear of harm from dogs and because of the presence of dog feces.<sup>4</sup>
- 89% of guide dog users report off-leash dogs interference with the guide-owner team and 42% report physical attacks on the guide-and-owner team.<sup>5</sup>
- Off-leash dogs have been found to be “the most significant threat to wintering snowy plovers”.<sup>6</sup>
- Dog feces affects native soils, plants<sup>7</sup> and wildlife.<sup>8</sup>

## Why must the Park Service Take Action?

Current management is:

- resulting in decreased use and enjoyment of the park by some community members;<sup>9</sup>
- harming wildlife, including Threatened and Endangered Species;<sup>3</sup> and
- inequitable: only one beach, the small China Beach, provides visitors with a dog-free park experience.

## Why Is the GGNRA Important?

- The GGNRA was created to bring a national park-caliber experience to the residents of the SF Bay Area, many of whom cannot visit places like Yosemite.
- The GGNRA is home to more Threatened and Endangered Species than Yellowstone, Yosemite, Sequoia, Death Valley and Kings Canyon National Parks combined, and one of the highest concentrations of sensitive species in the U.S.<sup>10</sup>
- As the Bay Area population grows, residents will depend even more on the park to access outdoor recreation and appreciate nature.

## What will the National Park Service’s Preferred Alternative Do?

The Preferred Alternative will be the largest accommodation of dogs into any national park in the United States.

- Under the Preferred Alternative, the National Park Service would create 7 off-leash areas within the GGNRA, including 2 miles of beach, and every trail except one in San Francisco and for on-leash dog recreation.<sup>11</sup>
- Nationally, the Park Service usually implements 36 C.F.R. § 2.15(a)(2), which requires all dogs in parks be on leashes and contained in a few, usually paved areas.

## How can the Proposed Policy Be Improved?

The National Park Service should alter its preferred alternative to:

- require all off-leash areas be enclosed to protect park users, wildlife and other dogs;
- limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats;
- provide more trails that are free of dogs (currently, only 1 trail in San Francisco will be available for those who do not wish to interact with dogs);
- limit dog walkers in the park to 3 dogs and to not permit commercial dog walking; and
- implement compliance-based adaptive management that requires at least 95% of dog walkers to comply with the new regulations.

**Submit comments to Frank Dean, General Superintendent, GGNRA, Building 201, Fort Mason San Francisco, CA 94123-0022 or by visiting <http://parkplanning.nps.gov/>**

Sierra Club, San Francisco Bay Chapter	Golden Gate Audubon Society	San Francisco League of Conservation Voters	Cal. Native Plant Society, Yerba Buena Chapter	Nature in the City	Wild Equity	National Parks Conservation Association	San Francisco Tomorrow
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## References

- <sup>1</sup> See, e.g., Criminal Incident Records prepared by the U.S. Dept. of Interior rangers for incidences in the GGNRA of dogs attacking or harassing human visitors in the park, including reports on 1/17/08 (dog bit horse on the muzzle, causing it to rear and fall over and, when freed, ran away into the ocean in a panic), 4/21/08 (in which a dog owner tried to separate his dog from an attacking pit bull and had been bitten, requiring medical attention; both dogs had been off-leash), 8/16/08 (child bitten in face by off-leash dog, requiring medical attention), 9/23/08 (woman hiking attacked and bitten on the hip), 9/24/08 (two women were harassed by a large, aggressive dog and the owners failed to call the dog off before giving up, letting the dog continue to harass them), 10/23/08 (dog made physical contact with a juvenile female, leading to a physical altercation between the girl's father and the dog's owner), 10/25/08 (two dogs attacked dog belonging to 75 year-old woman, biting her twice; attacking dogs' owner fled scene); 11/21/08 (man bitten by dog while hiking on a trail), 12/5/08 (dog attacks mounted park ranger), 12/30/08 (dogs attacked a horse causing it to throw its rider, then chased the horse down the beach). These are a small sample of the total report incidents that occurred in 2008 alone and many incidents go unreported or undocumented.
- <sup>2</sup> See, e.g., Criminal Incident Records prepared by the U.S. Dept. of Interior rangers for incidences in the GGNRA of injuries to dogs, including 2/08/08 (small dog "overpowered" and bit "multiple times" in the face and neck by off-leash dog), 4/20/08 (dog stuck on a cliff, requiring officers to perform a rescue), 5/31/08 (small dog attacked by pit bull, owner sustained injuries separating the dogs), 10/08/08 (dog fight occurred after professional dog walker failed to keep control of dogs), 11/22/08 (off-leash dog ran into roadway, colliding with a motorcycle and throwing the rider, requiring medical attention for the rider and dog), 12/30/08 (dog suffered "deep" laceration after being attacked by off-leash dog). These are only a few examples from 2008 of reported incidents in the GGNRA, which we know are a small subset of total incidents of this kind.
- <sup>3</sup> See, e.g. Criminal Incident Records prepared by U.S. Dept. of Interior rangers for incidences in the GGNRA of dogs chasing wildlife, including citations on 1/6/08 ("off-leash dog chasing birds in the dunes"), 3/5/08 ("dog chased nesting shorebirds...it ran more than 200 yards away from the dog walker and beyond any control for at least fifteen minutes."), 3/7/08 ("The pet was unattended and not under any control as it continually ran through the designated Wildlife Protection Area chasing birds."), 3/14/08 (owner of dog chasing birds explained, "He's a Pit Bull, likes birds, and needs something to chase."), 10/28/08 ("small dog running off leash jumping at flying birds"), and 12/15/08 (two large dogs flush a group of ducks from the shore into the water and then forced them to take flight). These are only a small sample of reported incidences of harassment of wildlife in 2008 alone, which are in turn a small subset of total disturbances to wildlife, most of which are unreported.
- <sup>4</sup> Roberts, N. 2007. *Visitor/Non-Visitor Use Constraints: Exploring Ethnic Minority Experiences and Perspectives*. Submitted to the Golden Gate National Recreation Area and the Golden Gate National Parks Conservancy, at iii, available at <http://wildequity.org/images/4856>.
- <sup>5</sup> Letter from Guide Dog Users, Inc. to Superintendent Brian O'Neill, GGNRA, December 21, 2005.
- <sup>6</sup> U.S. Dept. of Interior. 1998. *GGNRA, Draft Snowy Plover Management Plan, Ocean Beach, San Francisco*, at 21.
- <sup>7</sup> See, e.g., U.S. Dept. of Interior. 2011. *GGNRA Dog Management Plan/EIS Determination of Non-Impairment* ("DEIS"), at Appendix C-4, 5 ("An increase in nutrients from dog excrement in concentrated areas could result in some areas becoming overfertilized and lead to changes in species, both soil organisms and vegetation. Also, dog urine would increase the natural salinity of soil.")
- <sup>8</sup> See, e.g., Lafferty .D. 2001. *Disturbance to wintering western snowy plovers*. *Biological Conservation*. 101: 315-325 (finding that dogs were a "disproportionate source of disturbance" for snowy plovers); Lenth, B. et al. 2006. *The Effects on Dogs on Wildlife Communities*. 2006. Research Report Submitted to City of Boulder Open Space and Mountain Parks, available at [http://www.friendsofboulderopenspace.org/documents/dogs\\_wildlife\\_communities.pdf](http://www.friendsofboulderopenspace.org/documents/dogs_wildlife_communities.pdf) ("The presence of dogs along recreational trails correlated with altered patterns of habitat utilization by several wildlife species."); Banks, P.B. and J.V. Bryant. 2007. *Four-legged friend or foe? Dog walking displaces native birds from natural places*. *Biol. Lett.* (2007) 3, 611–613, available at <http://rsbl.royalsocietypublishing.org/content/3/6/611.full.pdf> (finding that dog walking resulted in a 41% reduction in the number of birds detected and a 35% reduction in species richness).
- <sup>9</sup> DEIS, at 1-2 (stating that "a dog management policy inconsistent with NPS regulations and increased public expectations for use of the park for dog recreation have resulted in controversy, litigation, and compromised visitor and employee safety, affecting visitor experience and resulting in resource degradation. The conflicts will likely escalate if not addressed in a comprehensive plan/EIS.")

<sup>10</sup> See <http://www.nature.nps.gov/biology/endangeredspecies/speciesdatabase.cfm>;  
<http://www.nature.nps.gov/biology/endangeredspecies/assets/docs/TopParkUnits.pdf>

<sup>11</sup> DEIS, at v-xi