**More Detailed Information about 2019 CGGNRA Superintendent’s Compendium**

There are significant changes, with major impacts on people with dogs, that were omitted from the Table of Changes. Details are given below for San Francisco and San Mateo Counties. Information on Marin will follow shortly.

**MAJOR LOSS OF DOG WALKING ACCESS IN SAN MATEO COUNTY**

In the San Mateo County GGNRA sites, on-leash dog walking is currently allowed throughout Rancho Corral de Tierra (people must stay on trail in the Equestrian Stables area and out of the small Charthouse Mitigation site) and on all trails except the Notch trail at Sweeney Ridge and at Phleger Estate per the 2017 Compendium.

According to the 2019 Compendium text and Changes Table, there have been no dog walking access changes at the San Mateo County GGNRA Sites. However, the 2019 Compendium Exhibit maps tell a much different story. According to Exhibits 37-39, there are major reductions in on-leash dog walking access. People with dogs would lose access to more than 3,000 acres of on-leash space at Rancho Corral de Tierra. In addition, on-leash dog walking trails are being cut at Milagra Ridge and Mori Point. Access to the Milagra Ridge trail system is being completely cut off to dog owners from the southern entrance—a significant hardship for visitors.

**Major Access Change to On-Leash Dog Walking at Rancho Corral de Tierra, San Mateo County – not mentioned in Table of Changes**

2019 Compendium Exhibit 39 is a map that shows on-leash dog walking limited to GGNRA’s interim trail plan trails at Rancho. This is a major change. According to a statement from Congresswoman Jackie Speier, dated July 3, 2013, then-Superintendent Frank Dean announced that he would designate all of Rancho as open to on-leash dog walking until a final Dog Management Plan went into effect. Given that the Dog Management Plan was never finalized, this status was never changed, and all of Rancho should be available for on-leash dog walking, not just trails. This was reflected in the maps showing existing conditions at Rancho that were part of the Dog Management Plan – all of Rancho was colored blue for on-leash dog walking everywhere, not just trails.

In addition, GGNRA’s Interim Trail Plan for Rancho Corral de Tierra enacted in 2015 states that “The Interim Trail Plan does not address or regulate dog walking activities and defers to the Dog Management Plan.” The DMP was withdrawn and never enacted.

There is no mention of any change in status for on-leash dog walking at Rancho in the 2017 Compendium text. We can assume, therefore, that dogs were still allowed to be walked on-leash anywhere in Rancho at this time. There is a map of Rancho included in the 2017 Compendium (Exhibit 19). This general map shows the trails included in the GGNRA’s interim trail plan and indicates that people must stay on trail in the equestrian stables area and stay out of a small site closure noted on the map (Charthouse Mitigation Site).

Exhibit 39 in the 2019 Compendium, however, is titled “Regulations for Pet Management” indicating that this map is intended solely to indicate where dogs can walk on-leash at Rancho. The legend for the map says: “Dog walking allowed only in areas designated as on-leash.” The only areas designated as on-leash in this map are the trails in the GGNRA’s Interim Trail Plan – an interim plan that is missing a number of trails at Rancho.

This constitutes a major reduction in access for on-leash dog walking at Rancho, a significant and controversial change that cannot be made in a Superintendent’s Compendium, but rather requires a robust public process and EIS process.

**Major Access Change to On-Leash Dog Walking at Milagra Ridge, San Mateo County – not mentioned in the Table of Changes**

The 2019 Compendium Exhibit 37 titled “Regulations for Pet Management” at Milagra Ridge shows several trails that were on-leash in 2017 and the Dog Management Plan, that are now listed as no dogs (if it is not listed as on-leash, the only other option is no dogs) – the southernmost part of the Milagra Ridge Trail, and the Milagra Creek Overlook Trail. This is a significant change in access that should not have been done in a Superintendent’s Compendium and that should have been listed in the Table of Changes but was not.

In addition, there is a small section of land at Milagra Ridge that is owned by the North Coast County Water District but managed by the GGNRA. This Water District land is just north of the park’s southern entrance. As shown in the 2017 Compendium map and the Dog Management Plan FEIS map, dog walkers have had access to the trails through the Water District land. However, according to the 2019 Compendium Exhibit 37 map, on-leash dog walking has been eliminated on these trails, thereby eliminating access for dog walkers to all of Milagra Ridge from the southern entrance. This is a significant hardship for people with dogs and a significant reduction in access of on-leash dog walking at Milagra Ridge. This change is not mentioned in the Compendium text, nor is it listed in the Table of Changes.

**Access Change for On-Leash Dog Walking at Mori Point, San Mateo County – not included in Table of Changes**

2019 Compendium Exhibit 38 “Regulations for Pet Management” shows two trails – Mori Bluff Trail and the Timigtac Trail – that are shown as no dogs. This is a change in access form the 2017 Compendium which allowed dogs on-leash on these trails (as also shown in the Dog Management Plan FEIS). While the Compendium Exhibit 38 map says the trails are unmaintained, they will still be open to hikers without dogs.

Therefore, the change from on-leash to no-dogs on the two trails in the 2019 Compendium is a significant reduction in access for dog walking. Plus, the Mori Bluff Trail is quite popular among dog walkers. This significant and controversial change is not mentioned in the Compendium text, nor is it listed in the Table of Changes.

**Access Change at Fort Funston – mentioned in Table of Changes but significance downplayed**

2017 Compendium – Describing areas closed to dogs at Fort Funston, it lists only two sites: “1) Fort Funston Habitat Protection Area; and 2) Coastal Trail at the intersection of Horse Trail to Great Highway, closed due to erosion.” (p. 25) The accompanying map, Exhibit 13B, shows all of Fort Funston as under voice control except for the Habitat Protection Area that was subject to a lawsuit in 2000. This area was closed after a public process, flawed though it may have been. No other area is listed as being closed to dogs.

2019 Compendium – Describing areas open to dogs at Fort Funston as: “Fort Funston, those portions depicted on are open to walking dogs under Voice Control. Dogs are not allowed in the Habitat Protection Area, in signed sensitive restoration areas, or in NPS and Park Partner administrative and operational areas.” (p. 16). Later, on p. 24, it lists two sites closed to dogs: “1) Signed NPS and Park Partner administrative and operational areas; and 2) Coastal Trail, intersection of Horse Trail to Great Highway, closed due to erosion.” These areas are shown on Exhibit 29, which show the Habitat Restoration from the 2017 Compendium, plus a second Sensitive Habitat Area and the area around administrative buildings at the southern end of the site.

The primary concern about this change is that it appears to be setting a new precedent for closing access to people with dogs if the GGNRA simply puts up a sign that says “Sensitive Restoration Area.” That will allow the GGNRA to incrementally close more and more areas at Fort Funston and elsewhere until, after a few years, the entire park is closed to dog walking. This is a significant change in how areas can be closed to dog walking, yet this aspect of the Compendium is not mentioned in the Table of Changes (the overall changes are listed, but not the potential impact of the wording of the change).

**Access Restriction at Ocean Beach – not mentioned in Table of Changes**

2017 Compendium – There is no mention of leash requirement in the Stairwells at Ocean Beach.

2019 Compendium – There is no mention of leash requirements in the Stairwells at Ocean Beach in the text of the Compendium. But Exhibit 31 shows a map of Ocean Beach with the notation that “Leash required on beach access stairwells 1 to 21.” This is a potentially significant restriction of off-leash access that will likely increase conflict between dog walkers and Park Rangers.

This added restriction was not mentioned in the Table of Changes. And anyone who read the Compendium text but didn’t look closely at the maps would not know that the GGNRA was making this change.

Note that there is no written justification for this change given anywhere in the 2019 Compendium as required by 36 CFR Section 1.5(c).

**Change in Definition of Voice Control – not mentioned in Table of Changes**

2017 Compendium – “Voice control means dogs are within earshot and eyesight of the owner/handler and respond immediately to commands to return to leash when called.” (p.4)

2019 Compendium – “Voice Control means a dog that is within earshot and eyesight of its owner or handler and that responds immediately to commands to return to leash when called or signaled. The owner or handler must demonstrate this ability when requested to do so by an authorized person. A dog not meeting these requirements will be considered running-at-large under 36 CFR, Section 2.15(d).” (p. 4)  
  
Why this matters – This adds the concept that an “authorized person” can ask a dog owner/handler to demonstrate immediate recall at any time, without needing a reason. This was part of the Dog Management Plan. It seems to be setting up Park Rangers to harass dog walkers by continually asking them to prove “immediate recall.” Note that “immediate recall is not defined – with one call? In 10 seconds? In 20 seconds? – and is too subjective.

Another problem is the designation of a dog as “running at large” if it does not have “immediate recall.” According to 36 CFR Section 2.15(d), a dog running at large “may be impounded, and the owner may be charged reasonable fees for kennel or boarding costs, feed, veterinarian fees, transportation costs, and disposal. It is clear from the context of this section that a dog running at large means a dog running wild with no owner anywhere nearby, e.g., a dog that ran out of an open door at a home and is now running free. It is not meant to describe a dog running off-leash with the owner close by. This inappropriate use of the term “running at large” in the 2019 Compendium definition appears intended to allow Park Rangers to impound dogs running off-leash with an owner nearby if the recall is not immediate enough.

This change in definition is not mentioned in the Table of Change. In addition, no written justification is given for the change in definition, as required by 36 CFR Section 1.5(c).

**Change in Definition of Unmanaged Dog – not in Table of Changes**

2017 Compendium – “Unmanaged Dogs means dogs that annoy, harass, or attack people, wildlife, livestock or other dogs, are presumed to be not under control.” (p.4)  
  
2019 Compendium – “Unmanaged dog means a dog that annoys, harasses, harms or threatens a person in a manner that a reasonable person would find annoying, harassing, harmful or threatening, or that annoys, harasses, harms or threatens another animal or harms park resources. This includes threatening behavior by dogs towards people or other animals such as snarling, snapping, chasing, charging, directed and sustained barking at, or uninvited taking or attempting to take food from another visitor or pet.” (p.4)  
  
Why this matters – This change adds the concept of what a “reasonable person” would find annoying, threatening, etc to the definition of an unmanaged dog. But what does “reasonable” mean? Again, this seems intended to provide Park Rangers with a mechanism to harass people with dogs, as almost any person could claim that, in their opinion, a dog was misbehaving and that would trigger Ranger involvement.

In public comment on the Final Rule for the Dog Management Plan, the SF/SPCA said: “National Park Service employees are not normally trained as animal control officers and therefore lack the expertise to determine which dog behaviors are undesirable and to effectively enforce the Proposed Rule.”

The Marin Humane Society, in its comment on the Final Rule for the DMP, said: “Rarely do non-animal responders completely understand dog behavior in a fashion that generates factual data. More importantly, individual perception of animal behavior require fact gathering to enable enforcement responders to adequately understand what the animal behavior impacts really are. Determination of these violations can easily be inaccurate…” Adding “reasonable person” to the definition of Unmanaged Dogs can only result in untrained people making inaccurate claims against people with dogs, and empower Ranger harassment based on these inaccurate claims.

This change in definition is not highlighted in the Table of Change. In addition, no written justification is given for the change in definition, as required by 36 CFR Section 1.5(c).

**Change in Definition of Managed Dogs – not included in Table of Changes**

2017 Compendium – “Managed Dogs means those dogs under control of their owner at all times. This control may be by voice or by leash, depending on the legal dog walking status of the area visited. The criterion is that the dog may not harass any person or animal.” (p. 3)

2019 Compendium – “Managed Dog means a dog that is under the control of its owner or handler at all times through the use of a leash not in excess of six feet in length, or by Voice Control in those designated areas open to off leash dog walking, such that the dog does not annoy, harass, harm, or threaten any person or animal or harm park resources.” (p. 4)

Why this matters – This change adds unnecessary detail, and seems intended to provide yet another excuse to harass people with dogs.

This change in definition is not highlighted in the Table of Change. In addition, no written justification is given for the change in definition, as required by 36 CFR Section 1.5(c).

**Ban on Commercial Dog Walking in San Mateo County**

The 2017 Superintendent’s Compendium did not mention commercial dog walking at San Mateo County park sites. The 2019 Superintendent’s Compendium explicitly bans commercial dog walking in San Mateo County. It says: “*Commercial Dog Walking: Commercial Dog Walking pursuant to an NPS permit is allowed in accordance with permit conditions in specified Park areas in San Francisco and Marin Counties. Commercial Dog Walking is prohibited in Park areas in San Mateo County.”*

The 2017 Compendium said the following: *Commercial Dog Walking:  The walking of four or more dogs, with the maximum of six, at one time by any one person for consideration (commercial dog walking) is prohibited within San Francisco and Marin County sites administered by Golden Gate National Recreation Area (GGNRA), unless:*

* *The person has been issued a current valid permit from GGNRA.*
* *The walking of four or more dogs, with a maximum of six, is done pursuant to the terms and conditions of that permit.*
* *Permit holders abide by all National Park Service regulations, including 36 CFR 2.15 (a),*

*which requires that dogs be restrained by a leash no longer than 6 feet in sites that are not*

*open to voice-control dog walking per the 1979 Pet Policy.*

* *The permit is visibly displayed and produced for inspection upon request by an officer with law enforcement authority in areas administered by GGNRA.*