

## Five significant issues found in the GGNRA DEIS

### Point #1

Overall lack of site-specific baseline conditions and impact analysis: The types of impacts that *could* occur from dog use are generalized but *actual* impacts from dogs at GGNRA sites are not documented.

**Example:** Negative impact of dogs on wetlands is assumed, but the location of wetlands relative to the existing dog use areas is not defined.

**Solution:** DEIS should provide site-specific baseline conditions, re-assess, and modify the selected alternative for each GGNRA site based on site-specific issues.

### Point #2

Undocumented assumptions: DEIS analysis is based on the assumption that noncompliance with leash laws results in negative resource impacts from dogs (vs. other sources) and that these impacts impair GGNRA natural resource values. It does not provide documentation of these assumptions.

**Example:** At some sites, the DEIS prohibits dogs from beach areas to protect shorebirds and stranded marine mammals, yet there is no documentation in the DEIS of current shorebird or marine mammal impacts caused by dogs.

**Solution:** Linkages of assumed impacts should be re-evaluated, re-assess and modify selected alternative for each GGNRA site based on documented impacts.

### Point #3

Poorly constructed and overly restrictive compliance-based adaptive management plan:

**Example:** Compliance-based adaptive management is proposed because of a faulty link between compliance and impacts.

**Example:** There are no details on the monitoring plan.

**Solution:** The baseline must be established first, and adaptive management decisions should be based on monitoring.

#### Point #4

The “No Action” alternative is not comparably analyzed. “No Action” impacts are overstated because of the assumption of non-compliance to existing voice control and wildlife harassment regulations.

**Example:** for many sites (Stinson Beach, Crissy Field, Mori Point, etc.) the impacts are different under no action and action alternatives even when management strategy is the same because compliance is assumed under action alternatives.

**Example:** A “No Action” alternative can include improved management practices, such as improved education and/or signage.

**Solution:** Re-evaluate unsupported assumptions, and revise the impact analysis presuming the same level of compliance on all alternatives being studied.

#### Point #5

The DEIS does not study the recreational impacts of the alternatives. Recreation is one of four outstanding values to be maintained and protected at the GGNRA as part of the 1972 enabling legislation. There is a visitor use experience section but does not identify recreation as part of the urban quality of life.

**Solution:** Add recreation resource section discussion in Chapters 3 and 4 and re-evaluate, reassess and modify selected alternatives for each GGNRA site based on impact to recreation.