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July 12, 2017

The Honorable Ryan Zinke
Office of the Secretary
United States Department of the Interior
1849 C Street N. W
Washington DC 20240

Dear Secretary Zinke,

On behalf of the Crissy Field Dog Group, I am writing to express concerns about the Department of the Interior's review team regarding the integrity of the development of the Proposed Plan and Rule for the Golden Gate National Recreation Area's (GGNRA) Dog Management process by one of its agencies – the National Park Service.

To provide some context, the GGNRA, for the past 12 years, has undergone an environmental review and rulemaking process to determine where dogs can walk off leash in the three counties (Marin, San Francisco and San Mateo) that encompass GGNRA lands. Dog walking is a very popular recreation activity in the Bay Area and the GGNRA's enabling legislation clearly carves out recreation as an important resource value.

There is overwhelming opposition to the GGNRA's Dog Management Plan and Rule Proposed Alternative from the public and Bay Area elected officials who believe that this Proposed Plan and Rule is far too restrictive as the GGNRA's environmental review is not based on sound science as required by law for such a radical departure from the current status quo.

A recent FOIA lawsuit revealed that numerous NPS and GGNRA officials, including two GGNRA superintendents, might have affected this planning and rulemaking process. These emails indicate that these officials had been using their private and government emails to collaborate behind the scenes with special interest groups that oppose dog walking. By colluding with these groups to lobby Bay Area elected officials on behalf of NPS' position, and by destroying administrative record files, demonstrating bias against dog walking supporters, and omitting scientific data from the Dog Management Plan and Rule, we believe that NPS has irreparably corrupted this administrative process used to develop the GGNRA's Dog Management Plan and Rule.

In May 2017, NPS announced that they planned to address these email concerns by commissioning an impartial review team to “evaluate whether the use of personal email, without forwarding the messages to government accounts, may have affected the planning and rulemaking process for the GGNRA.” This review team currently consists of three members (who are not identified) who all work for the Department of Interior (Office of Environmental Policy and Compliance, Office of Surface Mining Reclamation and Enforcement and BLM) and have been instructed to act in secrecy without any public input or transparency. The plan is to have this secret Department of Interior committee announce its decision with respect to the conduct of the Department of Interior when they are done. All we have been told is that this secret committee anticipates that their review will likely be completed sometime this summer and that the Record of Decision for the Dog Management Plan will not be signed until after the review panel delivers its conclusions and recommendations.

We are aware of no other circumstances where a governmental Department gets to evaluate its own serious misconduct such as presented here by a secret committee without any opportunity for public input. Regardless of the integrity of the individual members of this secret committee, the appearance of bias and conflict of interest is overwhelming.

We are deeply troubled by this secret process of self-evaluation by the Department of Interior. What is needed to restore public confidence and for fundamental due process is a publicly announced team of professionals outside of the Department of Interior who have unimpeachable credentials and who are not impaired by the appearance of bias and conflicts of interest to review and assess the impact of this environmental review and rulemaking process that affects millions of Bay Area residents and visitors to the GGNRA.

To this end, we are requesting that the composition of the review team be modified to include US EPA (with NEPA expertise) and CEQ personnel so there will be a fair and unbiased evaluation of this Dog Management process. We also request that the scope of this review be expanded to include all emails from NPS and GGNRA officials that had involvement in this environmental review and rulemaking process, an opportunity for public input, and including relevant government and private emails, to insure full transparency and objectivity of this review process.

Additionally, we are requesting that the Department of Interior’s Office of Inspector General conduct an independent investigation regarding the conduct of National Park Service employees of the development for the GGNRA’s Dog Management Plan and Rule.

Sincerely,

Martha Walters

Martha Walters
Chair, Crissy Field Dog Group

CC: Michael Reynolds. Acting NPS Director