

**GGNRA's draft EIS/draft Dog Management Plan  
Supplemental Comment on Crissy Field  
May 30, 2011**

**VIA E-mail**

This is a supplemental letter to accompany our comment letter which Crissy Field Dog Group hand delivered to your office on May 27, 2011 which will provide additional rationale and explanation to support our recommendations in Appendix A of that letter for Crissy Field.

**Background: Crissy Field Environmental Assessment**

The GGNRA released the Crissy Field Environmental Assessment (CF EA) in 1996, which found a Finding of No Significant Impact (FONSI) after going through an extensive five-year public involvement process. In the CF EA, the GGNRA increased the "voice command off leash dog walking" area from 38 to 70 acres at Crissy Field. In the CF EA, the GGNRA identified "dog walking" as a popular and valued activity at Crissy Field" (Page 2-30) and "would be a beneficial impact on recreation opportunities for dog enthusiasts" (Page 4-11).

Current zones -- Areas that were identified in the CF EA Proposed Action for "Allowable area for off leash dog-activities" included East Beach, Central Beach, the Promenade, the Grassy Airfield, and the beach east of the U.S. Coast Guard station.

Moreover, the promenade had very limited wheelchair access before the restoration and a concerted effort was made by the GGNRA to "make the entire site accessible, ramps added at boardwalk, overlooks, picnic areas, promenade" (Page 10) to provide accessibility for people with disabilities. And many older citizens walk their dogs off leash here as it is a level surface and is easier to walk on than the beach areas.

Designed for compatibility with restoration -- In addition, Crissy Field was intentionally restored, designed and constructed in a way that is complimentary for off leash, voice control dog walking. For example, on Page 2-23, the Proposal included the development of a 20-acre Tidal Marsh. "The tidal marsh was designed with a vegetated buffer zone ranging from 30-50 feet in width along the north side to 50-200 feet width along the south, east and west shoreline. This buffer consists of dune scrub species, which create a dense buffer between humans and wildlife as well as to provide upland habitat associated with the tidal marsh. Barrier fencing set within the vegetation deters dogs, cats, and visitors from getting into the marsh and disturbing wildlife. ...And there are two eastern overlooks that separate the promenade by fencing, barrier walls and a self closing gate to increase public safety and to ensure that off leash dogs do not have access to these areas."

Western Snowy Plover protection -- Since the CF EA, the GGNRA designated the West Beach (the beach east of the U.S. Coast Guard Station) a Wildlife Protection Area (WPA)

in 2006 to protect the federally threatened Western Snowy Plover who rests there for a portion of the year. There is a seasonal restriction in place that currently allows for dogs to walk on the water's edge on leash and for approximately two months, dogs may be off leash under voice control.

As you are aware, CFDG has worked closely with GGNRA staff and the Golden Gate Audubon Society in developing and sustaining an educational outreach program to protect the Western Snowy Plover for ALL visitors since 2006.

Cleanup -- As another element of our efforts to partner with GGNRA to protect the area's natural resources and visitor experience, CFDG provides thousands of doggie bags every year, which are distributed in the 17 dispensers at Crissy Field by CFDG volunteers on a DAILY basis. Every day is a clean up at Crissy Field for us.

### **Supplemental Comments**

After carefully reviewing the GGNRA draft Plan/draft EIS, we were extraordinarily surprised by the preferred alternative for Crissy Field, which would drastically reduce the amount of off leash, under voice control areas without a clear technical basis or explanation for the proposed variance from the analysis in the CF EA.

**This DEIS does not provide any substantial new empirical or analytical information that would support changing the conclusions and recommendations in the CF EA.**

Visitor use – Our recommended alternative (Appendix A) is based on two facts, one of which is stated in the draft Plan/DEIS, and one of which is indirectly acknowledged but not analyzed in the draft Plan/DEIS.

The first fact is that visitor use has remained relatively stable for the past 20 years and is not projected to increase significantly in the next 20 years. Therefore, the CF EA remains a sound foundation for designating zones appropriate for off leash dog walking at Crissy Field.

The second fact is that some recreational uses have intensified at Crissy Field even if overall Recreation Area visits have remained and will remain relatively stable for the foreseeable future. Those uses are mainly special events and bicycle use, with some additional types and diversity of waterborne recreation. The impacts of these uses, particularly on Crissy Field's beaches and the grassy field, need to be rigorously studied and integrated alternatives explored to achieve a fair balance that maintains and preserves traditional uses such as off leash dog walking.

As our other comments have explained in some detail, the impacts of use by people relative to the presence of people with dogs, and the consequent impacts and causes of any impairment of the integrity of the natural resources, have not been analyzed in the DEIS and do not provide a basis for the severe reduction in off leash dog walking area at Crissy Field in GGNRA's current preferred alternative in the draft Plan.

For example, Page 71 of the DEIS asserts: “Particularly on nice days, the high level and variety of visitor uses have resulted in conflicts, including intimidation, dogs knocking people over, dog-on dog fights and dogs biting people”. We have looked through this 2,400-page document, and have found nothing to substantiate this anecdotal assertion. Examination of the enforcement data summary table in Appendix G of the DEIS (Page G-1 to G-2) frequently cited in the DEIS, indicates does not support this assertion and indicated limited problems (see Appendix C of CFDG comments).

CFDG is not suggesting that conflicts never occur, whether among human visitors or among people and dogs. As noted above, CFDG understands that there are several hundred special events at Crissy Field totally thousands of people who normally would not go to Crissy Field, was well as the safety hazard by bicyclists on the promenade. There are solutions that need to be examined and incorporated into the proposed plan, such as providing bicyclists with a clearly signed alternative route (and speed limit) in the bike path along Mason Street to access Crissy Field. We are likewise willing to explore reducing potential conflicts and improving access for off leash dog walkers relative to the promenade.

Clear rules and signage – Our recommended plan include better signage as well as effective outreach and education proposed by GGNRA. For example, CFDG is not aware of kind of signage ever that the GGNRA has posted designating “Voice Control” areas for dog walking at Crissy Field. The only signage that has been posted is for the WPA at West Beach to protect the Western Snowy Plover, which CFDG supports.

In the CF EA, the Grassy Field (restored airfield) was designed and constructed for “active daily outdoor recreational use, including off leash dog walking” and “the airfield surface was vegetated with red molate fescue grass, a variety that poses a low potential for invasiveness to adjacent dune areas”(Page 2-13). The Grassy Airfield was designed not to allow traditional sporting events (such as soccer, ultimate frisbee, etc.) at Crissy Field.

The draft Plan/DEIS states that dogs contribute to soil erosion on the east portion side of the Grassy Airfield (Pages 364 and 365) but there is no specific documentation and a recent inspection (May 2011) by this author found no visible signs of erosion as described in this document and it is unclear how any dog would be able to create such a disturbance as, most, if not all dogs, run and play on top of the Grassy Airfield.

And one other point that needs to be conveyed is the fact that according to the GGNRA’s PEPC website regarding the GGNRA’s new General Management Plan (GMP) Newsletter #5, dated Summer 2009, states that **“the new plan will not revise decisions made in recent management plans for the Presidio, Crissy Field, Fort Point or Fort. Baker”**. Simple logic should prevail that the Crissy Field Environmental Assessment will stand as is and 70 acres of off leash dog walking under voice control remains in place as was approved by the GGNRA/NPS. Clearly there is a discrepancy between the GGNRA’s draft Dog Management Plan/DEIS and the new GGNRA GMP

## **Conclusion**

The only significant development identified in the draft Plan/DEIS since the CF EA has been the designation of the Western Snowy Plover Wildlife Protection Area. The continuation of the current management approach is being effective, as reflected in the draft Plan/EIS.

CFDG notes that the completion of the marsh restoration project proposed in the CF EA demonstrates that good urban and environmental design can protect diversity of visitor use and maintain off leash dog walking (along with voice control requirements).

.The other development since the CF EA, not yet analyzed in the draft Plan/DEIS, is the increased frequency and intensity of special events and some increased recreational uses. Rather than reducing off leash recreation from approximately 70 acres to Crissy Field now to approximately 20 acres of Crissy Field under the draft Plan – effectively assuring conflicts by concentrating use and therefore setting up a complete ban – the impacts of these uses should be examined in the framework of the CF EA to formulate a fair and balanced plan.

Sincerely,

Martha Walters  
Chair, Crissy Field Dog Group

May 30, 2011