

Site and Parameters	Alternative A: Current Conditions	Alternative B: 2.15 – all on leash	Alternative C: Applying Risk Factors and Criteria	Alternative D: Risk Factors and Applying Additional Site-Specific Data	Alternative E: Landscape scale treatment of Beaches and Trails with additional visitor experience components
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February 27, 2009

UPDATE - Memo to the files re: commercial dog walking – Dog Management EIS

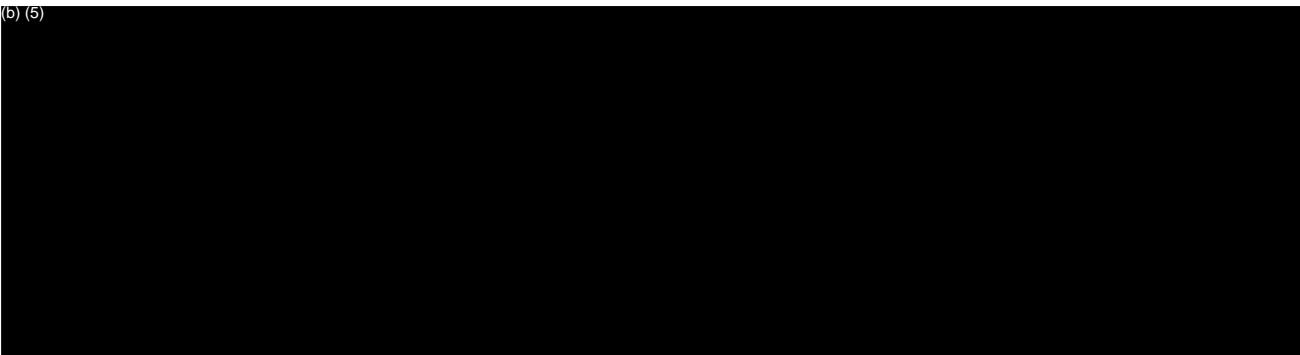
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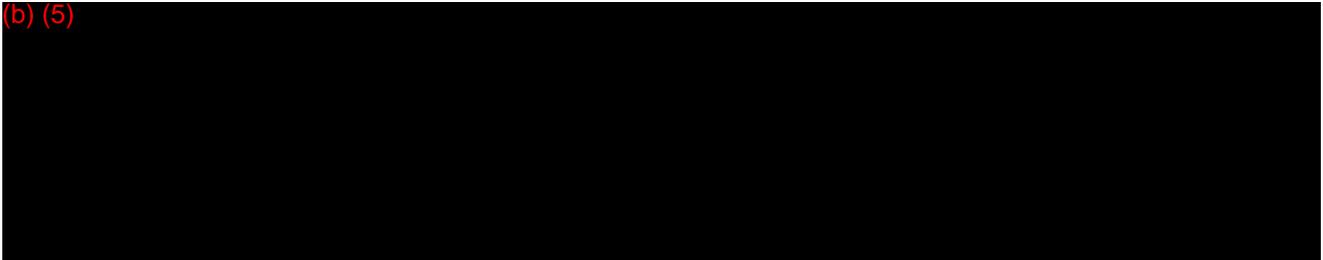
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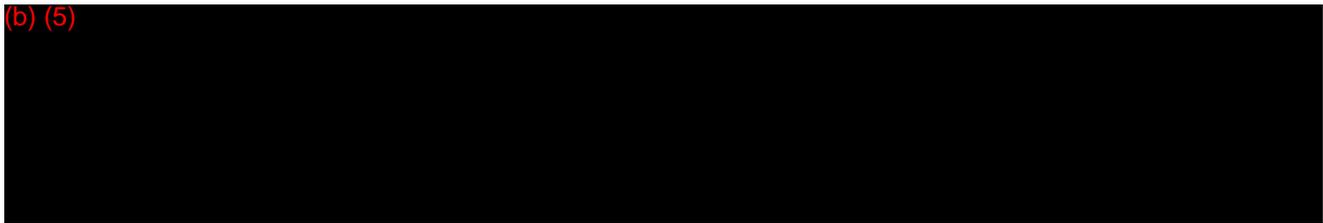
March 11, 2009

GOGA Proposal for approach to commercial dog walking – Dog Management EIS

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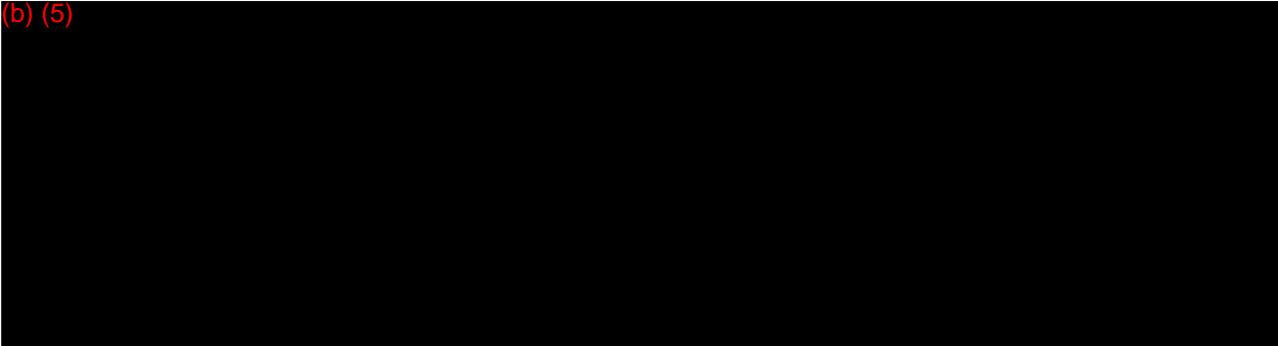
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February 27, 2009

UPDATE - Memo to the files re: commercial dog walking – Dog Management EIS

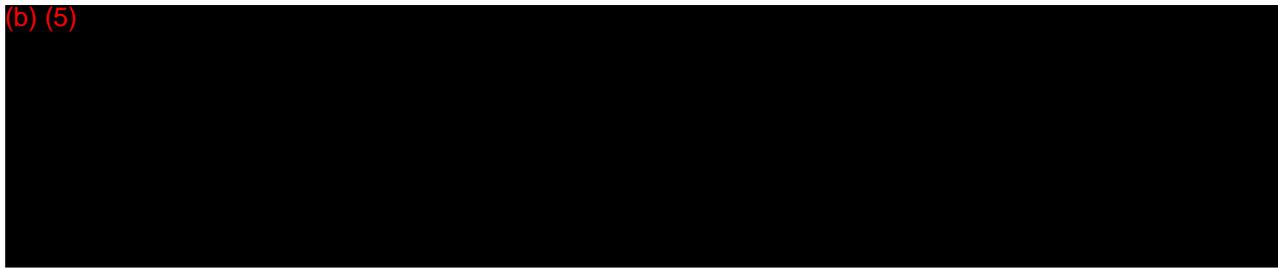
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ALTERNATE APPROACH 

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Draft Adaptive Management Strategy – GGNRA dog management plan/EIS - 12.08.09

INTRODUCTION

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STRATEGY 1 NATURAL RESOURCES

Strategy Number	Assigned Zone	What does it evaluate?	Trigger (indicator)	Remedy (management strategies) ¹	Personnel/ Approach to enforce remedy
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¹ Note, remedy must be clear, transparent and enforceable. Impacts analysis addresses noncompliance by assuming that adaptive management measures will keep impacts below moderate level.

STRATEGY 2 HEALTH, SAFETY AND VISITOR EXPERIENCE

Strategy Number	Assigned Zone	What does it evaluate?	Trigger (indicator)	Remedy (management strategies) ¹	Personnel/ Approach to enforce remedy
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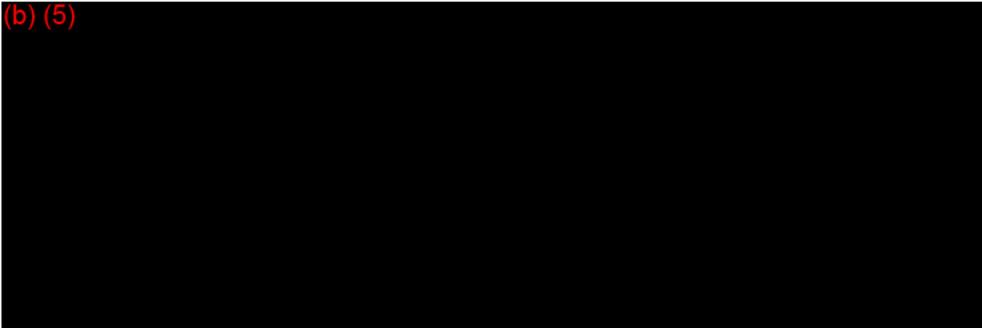
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GOGA Dog Management Plan/EIS
Commercial Dogwalking
draft

BACKGROUND

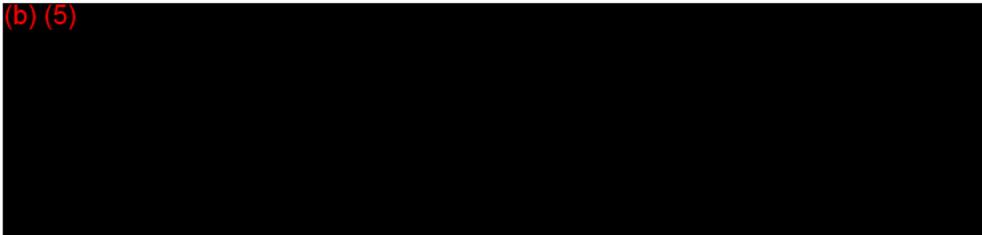
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APPROACHES TO MANAGING COMMERCIAL DOGWALKING

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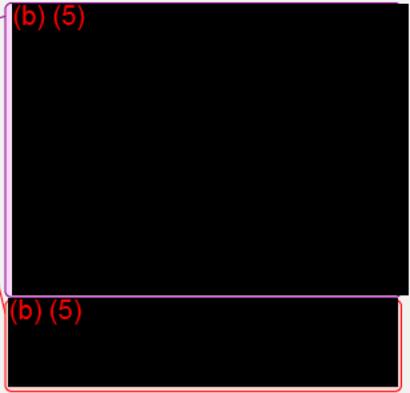
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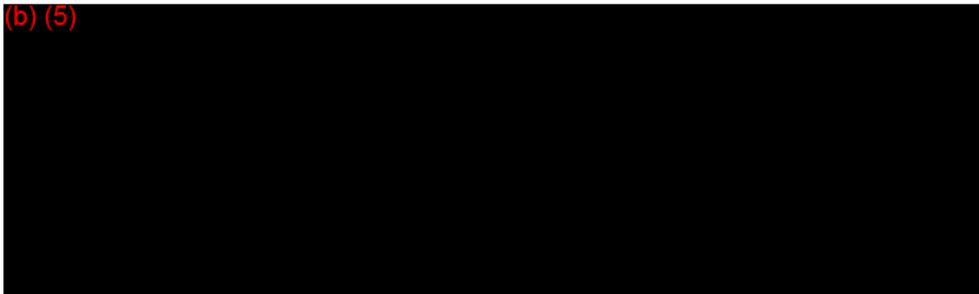
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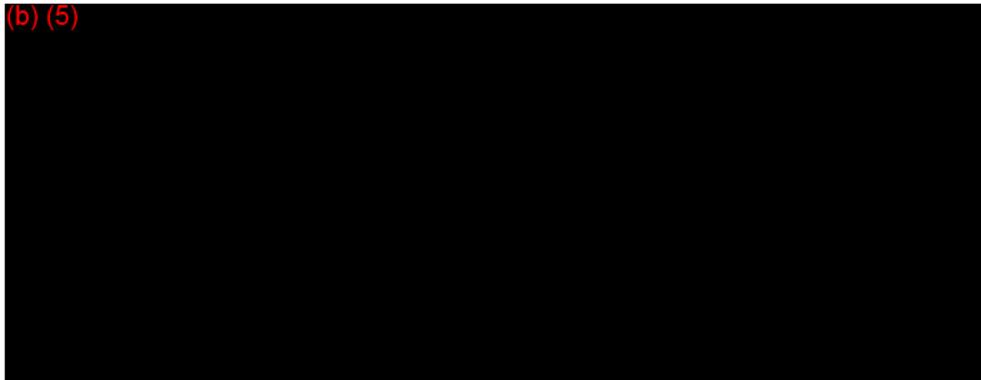
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GOGA Dog Management Plan/EIS
Commercial Dogwalking
draft

BACKGROUND

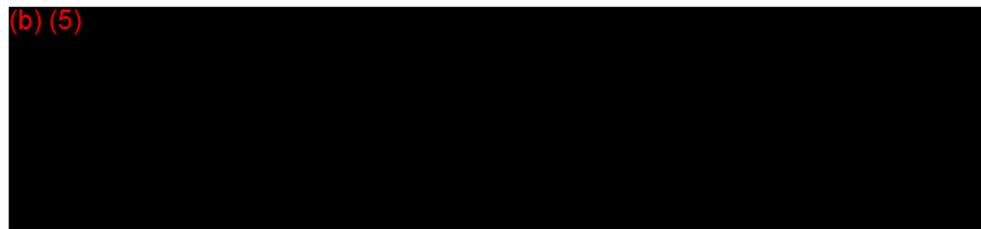
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GOGA Dog Management Plan/EIS
Commercial Dogwalking
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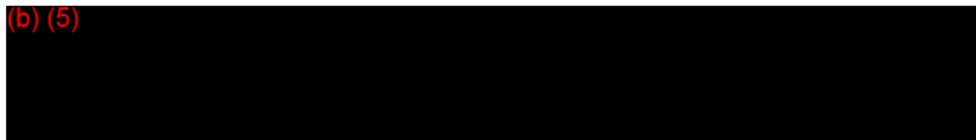
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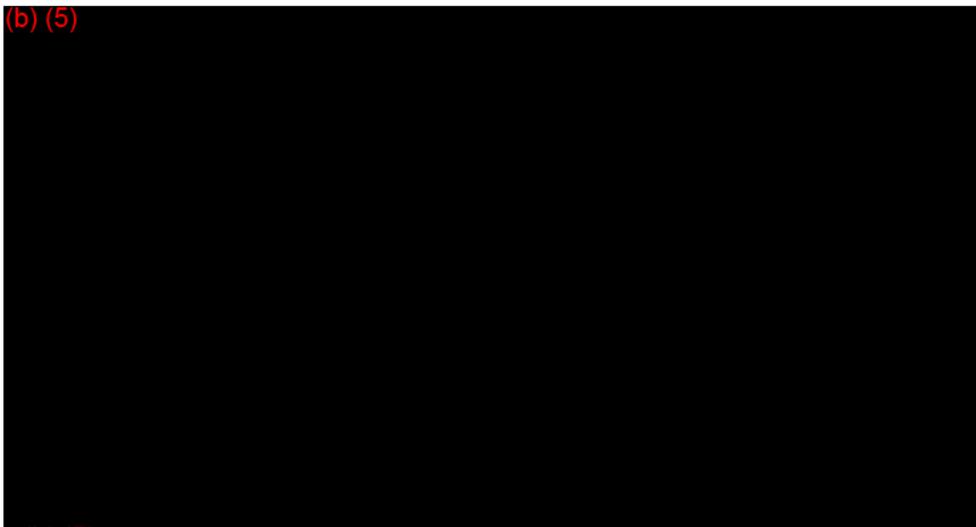
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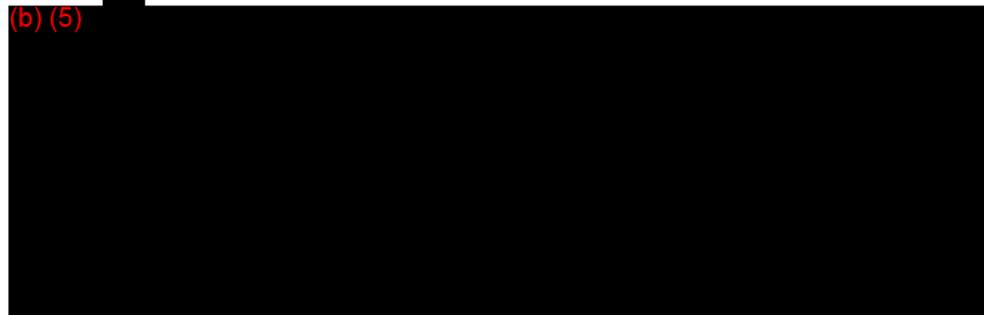
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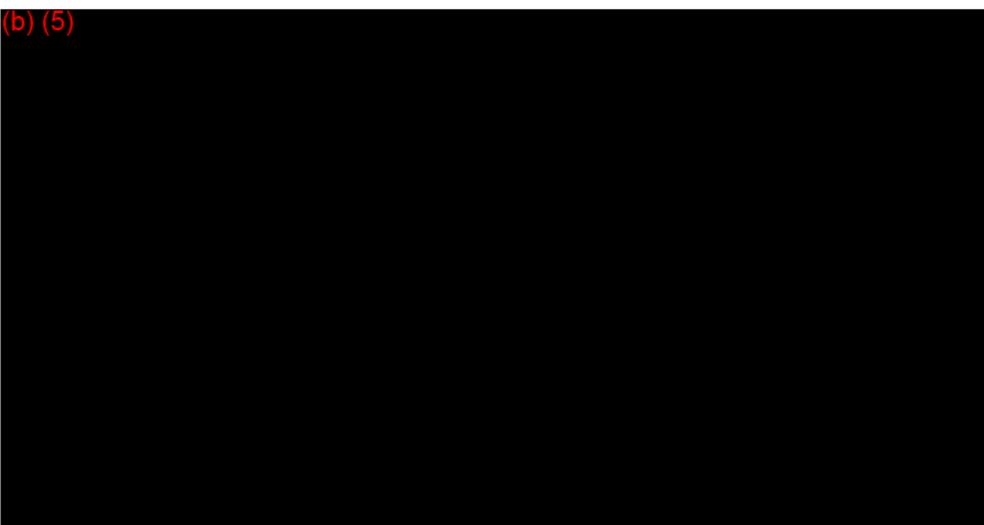
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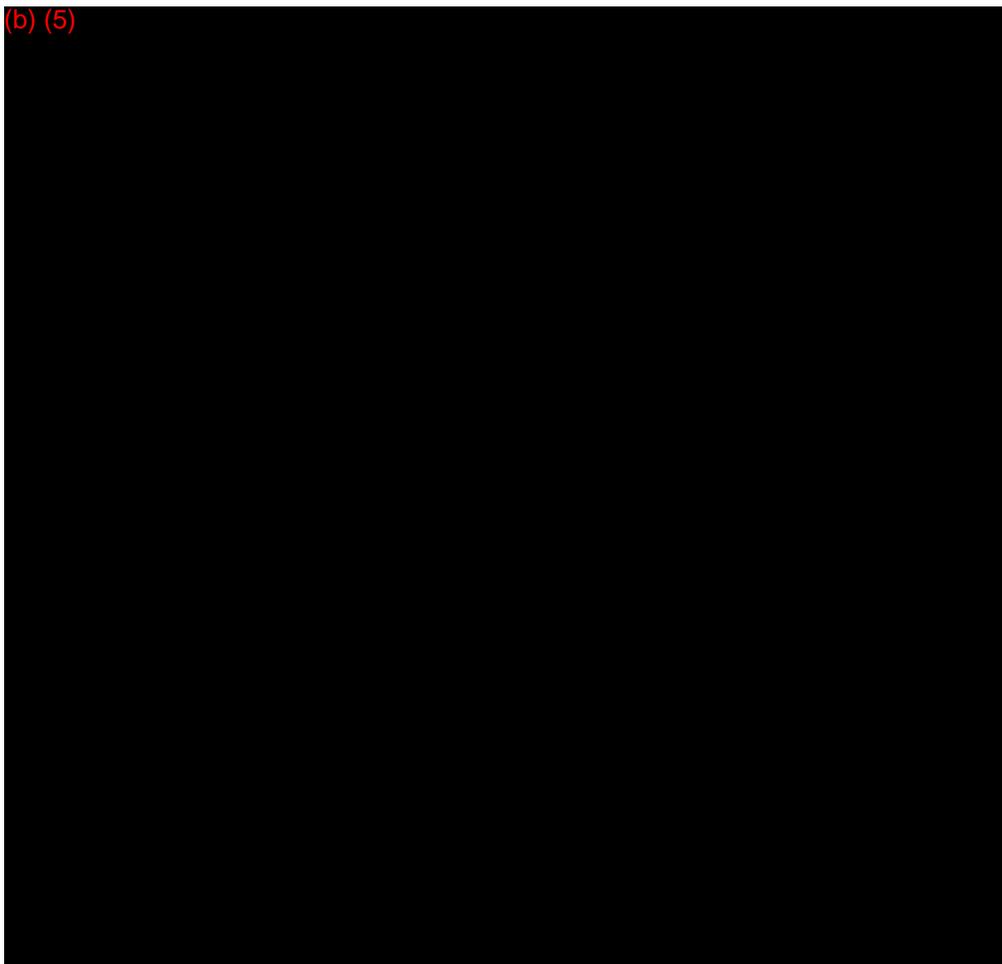
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GOGA Dog Management Plan/EIS
Commercial Dogwalking
draft

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National Parks Omnibus Management Act (16 USC 5966)

SEC. 418. COMMERCIAL USE AUTHORIZATIONS

- (a) **In General.**—To the extent specified in this section, the Secretary, upon request, may authorize a private person, corporation, or other entity to provide services to visitors to units of the National Park System through a commercial use authorization. Such authorizations shall not be considered as concessions contracts pursuant to this title nor shall other sections of this title be applicable to such authorizations except where expressly so stated.
- (b) **Criteria for Issuance of Authorizations.**—

- (1) **Required determinations.**—The authority of this section may be used only to authorize provision of services that the Secretary determines will have minimal impact on resources and values of the unit of the National Park System and are consistent with the purpose for which the unit was established and with all applicable management plans and park policies and regulations.
- (2) **Elements of authorization.**—The Secretary shall—
 - (A) require payment of a reasonable fee for issuance of an authorization under this section, such fees to remain available without further appropriation to be used, at a minimum, to recover associated management and administrative costs;
 - (B) require that the provision of services under such an authorization be accomplished in a manner consistent to the highest practicable degree with the preservation and conservation of park resources and values;
 - (C) take appropriate steps to limit the liability of the United States arising from the provision of services under such an authorization; and
 - (D) have no authority under this section to issue more authorizations than are consistent with the preservation and proper management of park resources and values, and shall establish such other conditions for issuance of such an authorization as the Secretary determines appropriate for the protection of visitors, provision of adequate and appropriate visitor services, and protection and proper management of the resources and values of the park.
- (c) **Limitations.**—Any authorization issued under this section shall be limited to—
 - (1) commercial operations with annual gross receipts of not more than \$25,000 resulting from services originating and provided solely within a unit of the National Park System pursuant to such authorization;
 - (2) the incidental use of resources of the unit by commercial operations which provide services originating and terminating outside of the boundaries of the unit; or
 - (3) such uses by organized children’s camps, outdoor clubs and nonprofit institutions (including back country use) and such other uses as the Secretary determines appropriate.

Nonprofit institutions are not required to obtain commercial use authorizations unless taxable income is derived by the institution from the authorized use.

- (d) **Prohibition on Construction.**—An authorization issued under this section shall not provide for the construction of any structure, fixture, or improvement on federally-owned lands within the boundaries of a unit of the National Park System.
- (e) **Duration.**—The term of any authorization issued under this section shall not exceed 2 years. No preferential right of renewal or similar provisions for renewal shall be granted by the Secretary.
- (f) **Other Contracts.**—A person, corporation, or other entity seeking or obtaining an authorization pursuant to this section shall not be precluded from also submitting proposals for concessions contracts.

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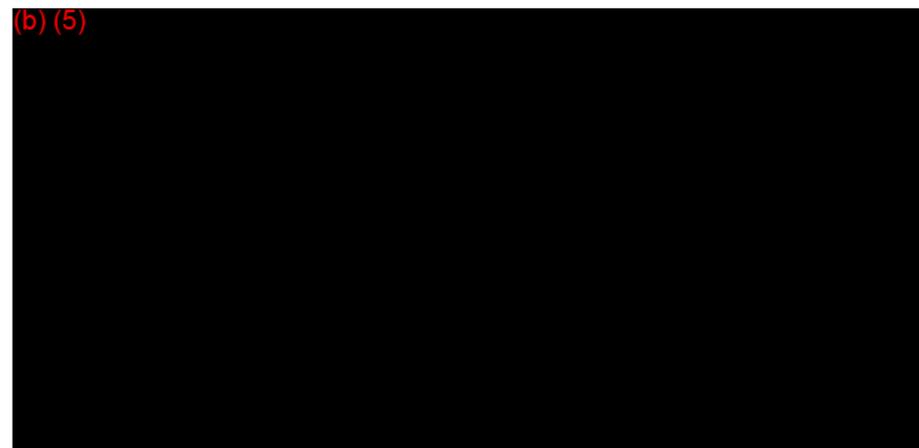
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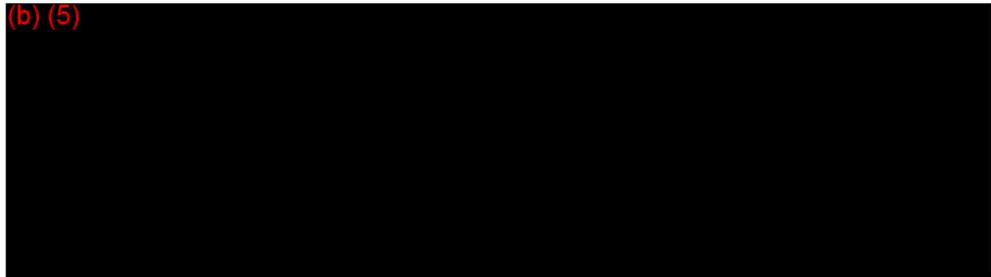
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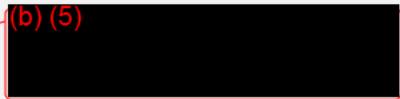
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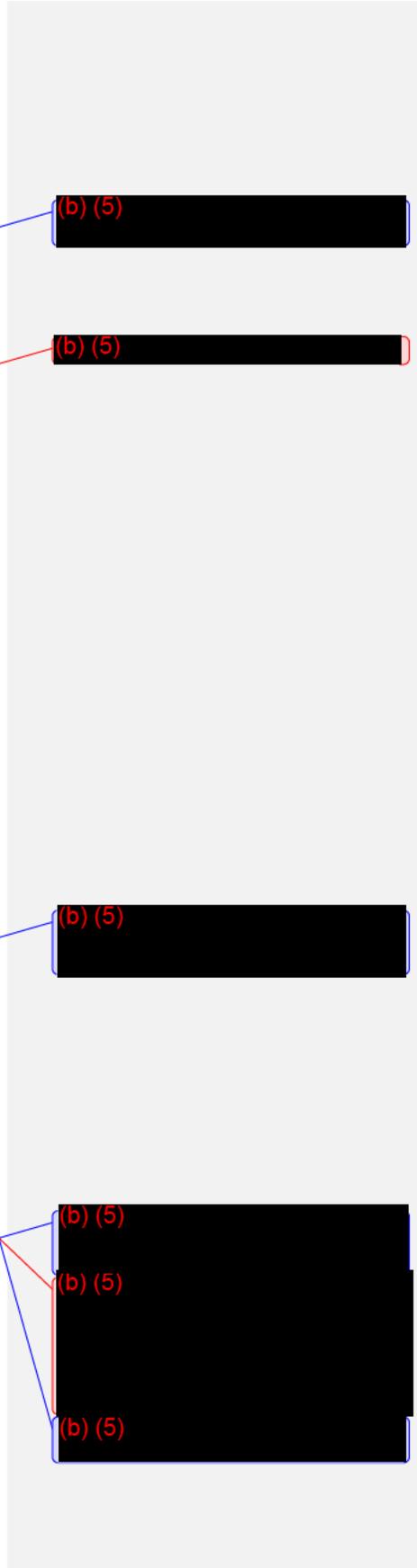
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Commercial Dogwalking
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GGNRA Dog Management Plan/EIS
Commercial Dogwalking
draft

BACKGROUND

Alternatives B, C, D, and E are the “action” alternatives. Commercial dogwalking is proposed in Alternatives B, C and E. Under Alternatives B and C, commercial dogwalking would be regulated under the same guidelines and regulations that apply to recreational dogwalkers, (b) (5) Because Alternative B does not allow for off-leash dogwalking, commercial dogwalking would be on-leash only. (b) (5)

Alternative D would not allow commercial dogwalking, due to the emphasis on resource protection.

Under Alternative E, commercial dogwalking would be a permitted use under the National Parks Omnibus Management Act of 1998 (NPOMA), which authorizes certain commercial uses to provide visitor services in national parks. Commercial dogwalking would be permitted under a commercial use authorization, with visitor services being provided in part through education and training for visitors with dogs. In addition, if the ROLA certification program were triggered as part of an adaptive management strategy, commercial dogwalkers would be required, as a condition of their permit, to provide the ROLA certification program training.

COMMERCIAL DOGWALKING CONCEPTS FROM THE NEGOTIATED RULEMAKING COMMITTEE:

The Negotiated Rulemaking Committee reviewed the following commercial dogwalking guidelines, and provided specific consensus recommendations on them to the NPS as noted. This consensus advice, which included some Commercial Dogwalking Concepts listed below, has been incorporated into Alternatives B, C, and E.

Commercial Dog Walking Concepts

The Negotiated Rulemaking Committee Work Group considered a set of guidelines for commercial dog walking offered by ProDog through its representative Joe Hague. The Golden Gate Audubon Society took a principled position opposing commercial dog walking in GGNRA. One other member of the Work Group also expressed concern about the principle of commercial dog walking in GGNRA. If, however, the decision is made to allow commercial dog walking in GGNRA, the following guidelines were proposed based on the ProDog proposal.

- 1) Professional Dog walkers must carry a leash for each dog in their care.

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- 2) Professional Dog walkers must pickup dog waste for all dogs in their care.
- 3) (b) (5)
- 4) Professional Dog walkers will carry a liability insurance policy for \$1 million. Proof of policy must be shown to acquire permit.
- 5) Professional Dog walkers will pay a permit fee to use the GGNRA lands, (recommend \$100 per dog walker, as they also must pay county permit fees).
- 6) Professional Dog walkers will transport dogs in a safe well ventilated vehicle.
- 7) Professional Dog walkers must have their dogs under control (see Dog Management Guideline #14 define "control").
- 8) Professional Dog walkers must abide by all rules regarding off leash dogs on GGNRA lands.
- 9) Having more then the allowed number of dogs will result in a fine for every dog over the limit. Second offense will result in a doubling of the fine, per dog. Third offense will result in suspension of dog walkers' permit for up to three months.

Based on the discussion, consensus was reached on putting forward the commercial dogwalking proposal to be analyzed in the NEPA process, with the following conditions:

- The NEPA analysis should address the question of whether to allow commercial dogwalking in the GGNRA.
- Commercial dogwalking in any GGNRA area will be subject to an analysis of overall carrying capacity of that area.
- NPS will evaluate the maximum number of dogs a commercial dogwalker may have at one time (Guideline #3), permit fees (Guideline #5), fines (Guideline #9), and how many dogs should be off-leash at any given time.
- Delete Guideline #7. (Note that Guideline 7 was deleted as redundant, because the control issue was covered under the Nine Guiding Principles agreed upon by the Negotiated Rulemaking Committee).
- All other proposed guidelines will be as noted in the progress report from the Work Group (see Attachment B, #4).

ALTERNATIVE A:

- This alternative reflects the current NPS servicewide approach to dogwalking as reflected by 36 CFR 2.15, and the intervening lawsuit U.S. v. Barley, in which personal off-leash dogwalking was allowed to continue in those areas where it was deemed acceptable by the 1979 Pet Policy, until NPS could establish new rules under the Administrative Procedure Act's notice and comment rulemaking requirements. While the 1979 Pet Policy did not address commercial dogwalking, its allowance or prohibition has not been specifically addressed by the NPS at Golden Gate NRRRA. This alternative reflects the current, unregulated nature of commercial dogwalking.

ALTERNATIVE B:

- This alternative reflects the NPS servicewide approach to dogwalking as reflected in NPS policy and regulations, codified at 36 CFR 2.15. This ~~is the~~ approach ~~as reflected by current servicewide NPS policy and regulations, but~~ is not

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currently enforced in GGNRA in those areas where the 1979 Pet Policy was in effect. Under this alternative, commercial dogwalkers would fall under the same general guidelines as any other recreational user, (b) (5)

(b) (5)

ALTERNATIVE C:

- This alternative seeks to maximize the diversity of visitor uses and also includes the consensus agreements reached by the GGNRA Dog Management Negotiated Rulemaking Committee. Dogwalkers are recognized as one of many recreational groups within GGNRA. A balance is sought to insure that all groups have adequate access, and that one use will not unduly infringe on other recreational uses. Under this alternative, commercial dogwalkers would fall under the same general guidelines as any other recreational user, (b) (5) and would be permitted to use both on and off leash areas. Because the ROLA certification program is triggered through adaptive management in this alternative, commercial dogwalkers would be required to obtain ROLA certification in a manner similar to any recreational user. If the ROLA certification program is triggered through adaptive management, dogwalking groups (both recreational and commercial) would be responsible for organizing and managing the ROLA certification program. If the program were not able to be organized and managed by dog groups, ROLA certification, as a first step in the adaptive management process, would be eliminated, with the next step being revocation to on-leash (in an originally off-leash) area, or revocation to no dogs (in an originally on-leash area). This alternative places the responsibility for the ROLA certification program squarely on both commercial and recreational dog groups. Failure to manage the ROLA certification program would eliminate an area as off-leash, or possibly on-leash.

(b) (5)

The Specific Elements piece is missing here (shows only under Alt E)

Comment [ses5]: As mentioned above; this should have some role called out of the NPS since the program is for protection of NPS resources/other visitor groups to park. As responsible entity, we should have a clear guiding role here

Also – since we are not permitting the commercial groups, how do we know who to contact to initiate the organization of the program. Further detail is needed to support this premise

ALTERNATIVE D:

- This alternative seeks to exceed the requirements of basic federal resource protection laws and policies, such as the NPS Organic Act and Endangered Species Act. This alternative errs on the side of caution by providing maximum protection to plant and animal species within the park, while still recognizing that GGNRA was established to provide recreational open space and that some impacts are inevitable. This alternative would not allow commercial dogwalking, due to the emphasis on resource protection.

ALTERNATIVE E:

- This alternative seeks to maximize access to dogwalkers, while still being consistent with NPS laws and policies. As a result, this alternative is the most management intensive. This alternative also includes the consensus agreements reached by the GGNRA Dog Management Negotiated Rulemaking Committee. Commercial dogwalking will be allowed under this alternative in both on and off-leash areas, however, it will be managed under a Commercial Use Authorization permit (CUA). As a condition of the CUA permit, commercial dogwalkers will

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provide education and outreach in the park related to dogwalking at GGNRA. In addition, commercial dogwalkers would provide certification training as part of the ROLA certification program if it is instituted as part of the adaptive management strategy. Alternative E is similar to Alternative C in that if the ROLA certification program is triggered through adaptive management, dogwalking groups (both recreational and commercial) would be responsible for organizing and managing the ROLA certification program under the auspices of the NPS. If the program were not able to be organized and managed by dog groups, ROLA certification, as a first step in the adaptive management process, would be eliminated, with the next step being revocation to on-leash (in an originally off-leash) area, or revocation to no dogs (in an originally on-leash area). This alternative places the responsibility for the ROLA certification program squarely on both commercial and recreational dog groups. Failure to manage the ROLA program would not result in revocation of a commercial dogwalking permit (CUA), but would eliminate an area as off-leash, or possibly on-leash.

- Specific elements:

- Educational and outreach activities will be provided by commercial dogwalkers, but coordinated by the NPS. Failure to provide educational services will result in permit revocation. Examples include:
 - Provide classes at GGNRA sites on dogwalking etiquette in parks and open spaces
 - Provide information on dogwalking at special events in the park.
 - Act as a source of information on dogwalking areas within GGNRA.
- Locations where allowed: Areas of Ft. Funston, Ft. Mason, Ocean Beach, Crissy Field, Alta Ave., Rodeo Beach, and Baker Beach *where on and off-leash dogwalking is allowed per this alternative.*
- One permit will be issued per company, which may allow for multiple dogwalkers. Each permit may have different terms and costs. Permit terms are left to the discretion of the Business Division, pursuant to the overall terms and/or limits set forth in this alternative.
- (b) (5)
- If ROLA Certification program is put in place as an adaptive management step, must have current ROLA certification (refer to guidelines of ROLA program).
- Caps on the number of commercial dogwalking permits issued will be determined based on whether or not there will be “minimal impact on park resources and values” (2006 NPS Management Policies). This determination shall be made at the discretion of the NPS Business Management Division, pursuant to the guidance set forth in the 2006 NPS Management Policies
- Use restrictions may be based on time of day and/or seasonal restrictions.
- In addition to numerical caps, an adaptive management strategy will be used as follows:

Comment [ses6]: At the beginning of this write up, Alt E was only going to require the commercial groups to provide the certification training. If they are to org and manage the whole cert program, we have the same issue in Alt C – need detail to understand what role NPS would play here

Further, we've eliminated having the certification program be anything but part of adaptive management. How does that jibe with having a range of alternatives?

Are we comfortable requiring that recreational and commercial groups join to form some kind of governing org? This could be a time-consuming and difficult step, which could delay the implementation of the of the program and force them into default

Comment [ses7]: Point of clarification – if we're selecting sites where both on and off-leash are available, Alta doesn't fit, since only on-leash is allowed

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- Monitor complaints, non-compliance, and impacts and report to park administration, Law Enforcement, Natural and Cultural Resources, and Business Management Divisions.
 - Where complaints, non-compliance, or impacts demonstrate that resources, visitor use or other commercial services are receiving more than a minimal impact per the CUA permit requirements, reduce number of commercial services permits provided at each location, either through immediate revocation (abuse of permit), or by not granting renewal.
- Visible sign of a permit required or designated clothing.
- Offenses:
 - All offenses may result in a ticket. 3rd offense in a calendar year results in inability to renew permit after two years. 4th offense in a calendar year results in immediate revocation. The “local file,” a file representing number of violations per dogwalker and commercial dogwalking company, is referenced and updated after each violation, allowing LE to track, in real time, whether or not a CUA shall be revoked. *(This would require the Business Management Division to check the LE database for each permit renewal).*
 - The NPS Law Enforcement Division will work with the U.S. Attorney’s office and U.S. District Court to establish appropriate fines (bail schedule).

Comment [MBE8]: Do we want offenses to match the ROLA program offenses – i.e. gone after one offense, but can try to renew after a year?

Comment [ses9R8]: There may need to be two levels of offenses – one for on leash use and ROLAs prior to the implementation of a ROLA certification program
 But once a ROLA certification program goes into effect, within a ROLA, seems like enforcement should be the same for all

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GGNRA Dog Management Plan/EIS
Commercial Dogwalking
Draft – September 29, 2008

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GOGA Dog Management Plan/EIS
Commercial Dogwalking
draft

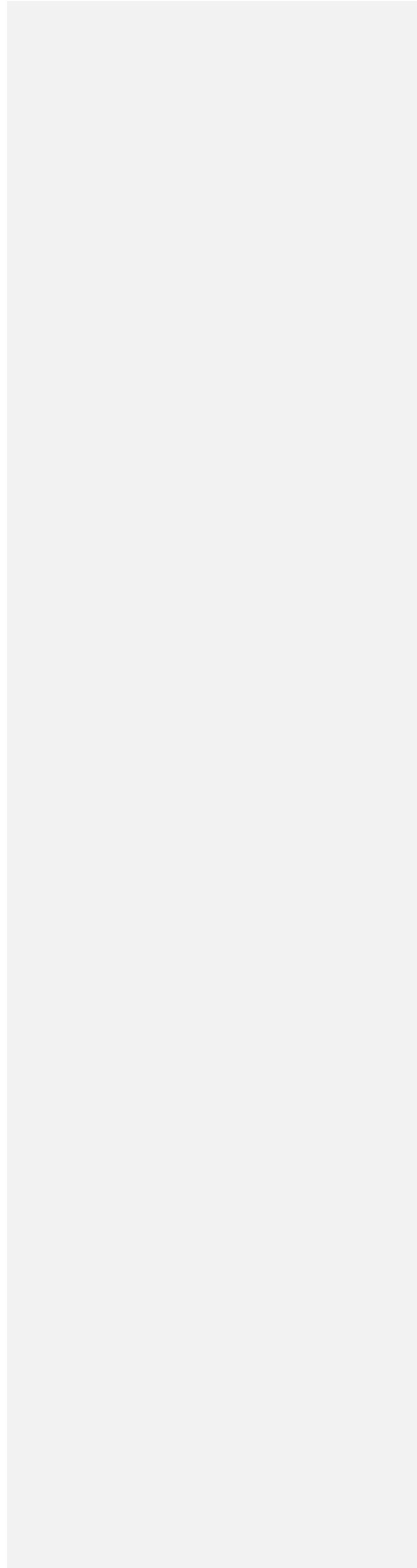
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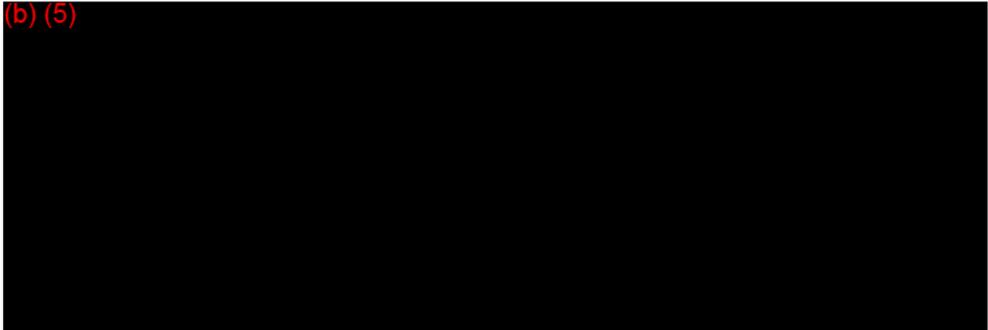
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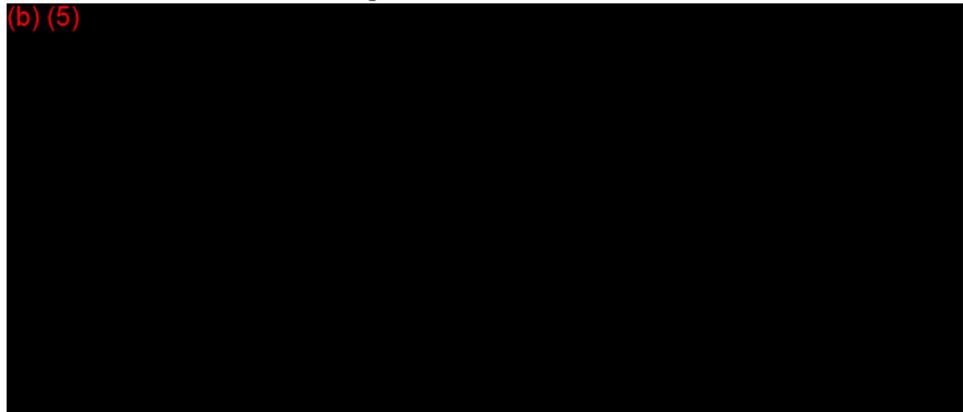
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Draft Adaptive Management Strategy – GGNRA dog management plan/EIS - 12.08.09

INTRODUCTION

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STRATEGY 1 NATURAL RESOURCES

Assigned Zone	What does it evaluate?	Examples from DEIS of short and long-term moderate impacts for veg, wildlife, and species of special status, AND examples of minor impacts as a point of comparison	Trigger (indicator)	Remedy (management strategies) ¹	Personnel/ Approach to enforce remedy
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STRATEGY 2 HEALTH, SAFETY AND VISITOR EXPERIENCE

Assigned Zone	What does it evaluate?	Examples from DEIS of short and long-term moderate impacts for health, safety, and visitor experience, and examples of minor impacts as a point of comparison	Trigger (indicator)	Remedy (management strategies) ¹	Personnel/ Approach to enforce remedy
(b) (5)	(b) (5)	(b) (5)	(b) (5)	(b) (5)	(b) (5)
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GOLDEN GATE NATIONAL RECREATION AREA
DOG MANAGEMENT PLAN/EIS
Definition of responsible off-leash dog control in ROLAs

deliberative internal draft

GOLDEN GATE NATIONAL RECREATION AREA

Definition of regulated off-leash dog control in ROLAs:

- Any uncontrolled dog is prohibited. Dogs in a ROLA are to be kept under control at all times. Dogs are considered under control when they are within direct eyesight of the owner/guardian/handler and when they have the ability to immediately return to their owner/guardian/handler. Dogs are presumed to not be under control if they:
 - annoy, harass, or attack people, livestock, or other leashed or unleashed dogs,
 - intentionally or unintentionally annoy, pursue, hunt, harass, harm, wound, chase, attack, capture, or kill wildlife,
 - enter leash-required or dog-prohibited areas, and/or
 - dig, destroy vegetation, or enter fenced or closed areas.
- (b) (5)
- Dogs must be licensed and wear an ID at all times, including name and phone number of the owner.
- All dog walkers must have a leash for each dog under their care.
- Dogs under four months old must be leashed.
- Dogs in heat are not allowed in ROLAs.

Comment [ses1]: My notes indicate we should use language out of 36CFR2.2(a)(2), which is: (The following are prohibited:) The feeding, touching, teasing, frightening or intentional disturbing of wildlife nesting, breeding or other activities

Comment [MBE2]: Suggestion was to apply this to all dogs, leashed or unleashed. But if TAG program incorporates this req then would not need it here (Shirwin – will you incorporate into TAG?) Would still need it for leashed dogs though, as a common to all alternative element

Comment [ses3R2]: The ROLA certification program is for education/cert of the dogwalker, so no ID tags will be required of dogs through that program – at least as now envisioned

GOGA Final Alternatives – by county – North to South

Revised March 20, 2009

Golden Gate National Recreation Area Dog Management Plan / EIS

[REDACTED]	(b) (5) [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Monitoring Management Strategy (MMS) – future to do’s

Goal of the monitoring management strategy is to collect detailed information on number and type of regulatory violations, and to collect targeted information on key resources impacted by dogs. Both of these commitments will begin after the special regulation for dogwalking is promulgated. This information is needed to ensure that site-specific information exists should the park need to further regulate dogwalking in the future. It also provides a source of feedback to the dogwalking community of problem areas, and can strengthen partnerships where issues are addressed jointly.

Future needs - MMS (compliance):

- Develop a detailed monitoring plan to guide compliance monitoring, data management, and reporting. The framework is described in the dog plan/EIS, but the specific monitoring methodology will need to be developed.
 - Monitoring for compliance will result in raw data. Interpretation of that data, such as how it affects visitor use, is subject to park interpretation. Indicators and standards may be helpful here.
 - (b) (5) [REDACTED]
- Funding

Future needs - MMS (natural / cultural resources):

- (b) (5) [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- Funding