UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAY 27 2011

Frank Dean, General Superintendent
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123
Attn: Dog Management Plan

Subject: Draft Environmental Impact Statement for the Dog Management Plan, Marin, San Francisco, and San Mateo Counties, California (CEQ# 20110004)

Dear Mr. Dean:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the above project. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The National Park Service (NPS) has developed a Dog Management Plan that is intended to provide clear, enforceable policy regarding the manner and extent of dog use on Golden Gate National Recreation Area (GGNRA) lands. The proposed Plan and Draft EIS describe six alternatives for each of twenty-two locations for the management of dog activities in San Francisco, Marin, and San Mateo Counties, and detail the resources that would be affected at those locations. NPS has identified, for each site, a preferred alternative that is expected to minimize environmental impacts to endangered species such as the snowy plover and mission blue butterfly, decrease disturbance of soils and vegetation, and protect water quality of lagoons, creeks, and wetland habitats.

EPA recognizes and appreciates the need to manage recreational use of GGNRA lands in order to protect sensitive resources, and the difficulty of balancing the often competing goals of conservation and public access. We support the imposition of reasonable restrictions on dogs where necessary and appropriate. From the perspective of protecting resources within the GGNRA, the proposed action has many clear benefits; however, we are concerned that the Draft EIS does not fully address the potential impacts on resources outside of the GGNRA, as well as some impacts within GGNRA boundaries.

Based on our review, EPA has rated the document Environmental Concerns- Insufficient Information (see enclosed "Summary of EPA Rating Definitions"). We believe that the Draft EIS presents an insufficient analysis of the proposed Plan's indirect impacts on city, county, and State parks, as well as GGNRA lands. Additional analysis should be conducted to identify the locations outside of the subject GGNRA lands that are most likely to receive greater use by current GGNRA users seeking alternate

recreational areas for their dogs, and to evaluate the likely impacts of increased use of such alternate areas by such individuals and their dogs. EPA recommends that, in the Final EIS, NPS 1) identify locations of parks that are likely to receive increased visitation, 2) identify the resources at these locations, and 3) discuss more thoroughly the potential induced impacts on these resources.

For most of the GGNNRA locations, the Draft EIS identifies at least one city, county or State park that may receive increased visitation as a result of implementing the preferred alternative. These parks appear to have been selected based primarily on geographic proximity to the GGNRA location. Proximity may not always be the determining factor for where a person will choose to walk his/her dog. In the Final EIS, NPS should include the reasoning used in identifying locations that may experience induced visitation, considering factors such as types of recreation available (trails, roads, off-leash, on-leash), types of habitat and terrain (beach, forest, scrubland, hilly, flat), the availability of water for drinking or water play, the availability of nearby parking, the presence or absence of poison oak, etc., in addition to proximity. Surveys of current GGNRA users with dogs may be useful in identifying the alternate areas most likely to be visited. The Final EIS should identify the parks most likely to receive increased visitation, particularly near high-use GGNRA locations where there would be restrictions or concentrated dog recreation, including Muir Beach, Crissy Field, Baker Beach, Ocean Beach, and Fort Funston.

The Draft EIS does not identify the types of resources that are likely to be adversely affected as a result of indirect impacts. For many of the GGNRA locations, the document states that the types of resources present at the potential alternate parks are unknown. Some of the alternate parks contain water bodies, vegetation, and/or wildlife that could be affected by increased dog use. Other resources or values that may be affected include visitor experience or human health and safety. EPA encourages NPS to identify more thoroughly those resources on which indirect impacts will occur.

Finally, the Draft EIS does not sufficiently identify and analyze impacts on the resources at locations likely to receive increased visitation. For some GGNRA locations, such as Mori Point for example, the Draft EIS states that water quality (p. 529), vegetation (p. 671), and wildlife (p. 963) at adjacent sites could receive indirect impacts as a result of implementing the preferred alternative, but that any impacts to those resources are expected to be negligible. No information or documentation is provided to support this conclusion for Mori Point, nor for many of the other locations that would experience changes in dog use as a result of implementation of the preferred alternative. The Final EIS should describe the likely impacts on areas expected to receive increased use and explain how they were determined.

Although, on the whole, EPA expects that the proposed action would be beneficial to GGNRA lands and resources, potential adverse impacts are not limited to other parks, but also include some GGNRA lands. For example, the document states that the preferred alternative for Muir Beach "provides a no-dog experience on the beach and those visitors looking for a southern Marin beach for dog walking could go to Rodeo Beach" (p. 104). Therefore, it is reasonably foreseeable that Rodeo Beach will experience indirect impacts as a result of restrictions at Muir Beach. The DEIS does not analyze the impacts to Rodeo Beach that would be expected from eliminating dog recreation on Muir Beach, which is a "high on weekends" visitor use area (p. 271). This is particularly notable given that Rodeo lagoon has occurrences of federally-endangered tidewater goby.

The DEIS identifies numerous city, municipal, and State parks in the Bay Area that provide opportunities for recreation with dogs; however, many of them are located at substantial distances from GGNRA locations where restrictions would occur. It may not be necessary to fully analyze potential indirect impacts at all of the identified parks. Some city and local parks do not have sensitive resources such as wetlands, coastal dunes, or endangered species, and some city and local parks would not expect increased visitation as a result of the proposed action. Some GGNRA lands are identified as low-use areas and may have negligible displaced impacts. However, a fuller analysis of reasonably foreseeable impacts where they would be most likely to occur should be provided in the Final EIS. Some potential indirect impacts that should be more thoroughly investigated include impacts to water quality, vegetation, wildlife, and park maintenance needs; changes in vehicle miles traveled to access recreational sites; dog waste management; visitor use experience; and increased or concentrated erosion.

EPA encourages NPS to continue to work with cities in Marin, San Francisco, and San Mateo to resolve conflicts, address community concerns, and increase public understanding of the need and basis for the proposed action.

We appreciate the opportunity to review this DEIS. Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact Stephanie Skophammer, the lead reviewer for the project. Stephanie can be reached at (415) 972-3098 or skophammer.stephanie@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures: Summary of EPA Rating Definitions