



Categorical Exclusion Approval and Decision to Implement

Project Information:

Park Name: Golden Gate National Recreation Area
Project Title: Interim Commercial Dog Walking Public Use Limit and Permit Requirement
PEPC Number: 46523
Project Location:
County, State: San Francisco and Marin Counties, California
Administrative
Record Location: Fort Mason, Bldg. 101; San Francisco, CA 94123

Introduction: This memorandum and attachments document and complete National Environmental Policy Act (NEPA) review and requirements for implementing Interim Commercial Dog Walking Public Use Limit and Permit System - Golden Gate National Recreation Area.

Compliance Determination: The full administrative record for this project is available in the GGNRA Environmental Compliance Office (San Francisco, CA 94123).

Project Description: See Attachment A

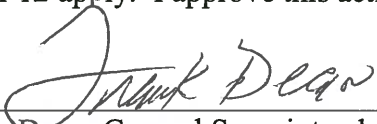
Categorical Exclusion: On the basis of the potential visitor safety, visitor experience and natural and cultural resource impacts assessed in assessed in Attachment A, park interdisciplinary review, public comment review, and the information in the administrative record, this project is Categorically Excluded (CE) from further NEPA analysis in accordance with DO-12, Sections 3.4:

D.3 Minor changes in programs and regulations pertaining to visitor activities.

Additional supporting information for this determination is in the following attachments and administrative record:

- Attachment A: Project Description, Purpose and Need, Environmental Screening Form, and Response to Comments
- Attachment B: Special Use Permit
- Attachment C: GGNRA Compendium Language

Decision: On the basis of my review of the environmental impact analysis, public comment, and all information in the administrative record, I am categorically excluding the Project from further NEPA analysis. No exceptional circumstances or conditions in Section 3-5 of NPS Director's Order 12 apply. I approve this action to be implemented per 36 CFR 1.5 and 1.6.



Frank Dean, General Superintendent
Golden Gate National Recreation Area

May 27, 2014
Date



ATTACHMENT A

Project Description, Environmental Screening Form, and Response to Comments

A. PROJECT INFORMATION

Park Name:	Golden Gate National Recreation Area
Project Title:	Interim Commercial Dog Walking Public Use Limit and Permit Requirement
PEPC Number:	46523
Project Location:	
County, State:	San Francisco and Marin Counties, California
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B. PROJECT DESCRIPTION

Golden Gate National Recreation Area (GGNRA) and the Presidio Trust are proposing to establish an interim public use limit and permit requirement for persons who are walking four or more dogs at one time for consideration (commercial dog walker) on lands under the administrative jurisdiction of the National Park Service in Marin County and the City and County of San Francisco, and under the jurisdiction of the Presidio Trust in the Presidio of San Francisco (Area B of the Presidio) where dog walking is allowed. Permits will allow a maximum of six dogs per dog walker, and require a business license and proof of liability insurance and approved dog-handling training through existing training courses. Permit holders must abide by all NPS and Presidio Trust regulations. This includes NPS regulation 36 CFR 2.15(a), which requires that dogs be restrained by a leash no longer than 6 feet in length in sites that are not open to voice control dog walking per the 1979 Pet Policy; and Presidio Trust regulation 36 CFR 1002.6. The NPS permits would be honored by the Presidio Trust. The annual permit cost would be a \$75.00 application fee and \$300 per person for a non-transferrable badge.

This use limit would be an interim action for both the GGNRA and Presidio Trust and would remain in effect in GGNRA until a final special regulation for dog walking, including commercial dog walking, is promulgated. That final special regulation is anticipated in late 2015. Should the Superintendent of GGNRA approve this interim public use limit and permit system, an amendment to GGNRA's Compendium would be completed. Should the Presidio Trust Executive Director approve this interim public use limit and permit system, an interim rule would be promulgated through publication in the Federal Register.

C. PURPOSE AND NEED

Why Commercial Dog Walking Permits Are Necessary

NPS Policy: Commercial dog walking falls within the definition of a special park use (NPS Management Policies - 8.6.1).

Adjacent Jurisdictions: This proposed commercial dog walking limit and permit requirement is a direct response to commercial dog walking permit programs recently enacted in San Francisco by the San Francisco Board of Supervisors and in Tiburon, Marin County by the Town of Tiburon. These permit programs limit the number of dogs per commercial dog walker to 8 or 6 dogs, respectively. Given the extremely broad geographical reach (parks, open spaces, Port of San Francisco lands, and San Francisco Public Utility Commission properties) of the City and County of San Francisco's ordinance, coupled with the effect of the City of Tiburon's ordinance, the National Park Service (NPS) reasonably anticipates that a number of commercial dog walkers who use the areas in San Francisco and Tiburon that would cause them to fall under these ordinances, will instead walk their dogs in GGNRA areas in San Francisco and Marin Counties that are already heavily used by dog walkers, including commercial dog walkers. The San Francisco ordinance on commercial dog walking went into effect July 1, 2013, with a 120 day grace period to November 1, 2013, to allow completion of permit training requirements. As of March 11, 2014, 163 commercial dog walking permits had been issued by San Francisco's Animal Care and Control. The Town of Tiburon's permit program went into effect July 19, 2013; as of March 12, two permits had been issued by the City of Tiburon.

The San Francisco ordinance is anticipated to have a noticeable impact, particularly at Fort Funston and Crissy Field, the two sites most regularly used by dog walkers. Crissy Field already receives very high visitor use (approximately 3.2 million in 2009), including from individual and commercial dog walkers. GGNRA staff estimate that there are generally ten to fifteen commercial dog walkers per day (fewer on weekends than weekdays), and typically at least three present, with at least four to eight dogs each, at any given time of the day. A 2011 visitor use study¹ found that 24% of visitors at Crissy Field were dog walkers. That same study found that at Fort Funston, where the average number of dogs walked at the site each day is 1,600, an average of 62% of daily visitors were dog walkers (66% on weekdays and 57% on weekends). On weekends, 3.1% of dogs at Fort Funston are walked in groups larger than 6, accounting for 10 dog walker visits per weekend day. However, on weekdays, 34.7% of dogs were in groups larger than 6, accounting for approximately 127 dog walker visits per weekday. Of that weekday group 19.4% of dogs were in groups larger than 8 (approximately 61 dog walker visits). The study notes: "At Fort Funston, many visitors were observed with large groups of dogs. While some of these visitors may be individuals who own multiple dogs, most are likely professional dog walkers."

Marin County Parks and Open Space began requiring permits for commercial dog walkers on Open Space lands in 2002; the permits allowed a maximum of 6 dogs per walker. Currently, certain GGNRA-managed sites in southern Marin, particularly Alta Avenue above Marin City, are used by commercial dog walkers with more than six dogs per person. The Alta Trail, an easily accessible GGNRA site in close proximity to the town of Tiburon, is regularly used by commercial dog walkers who have an average of ten dogs each. GGNRA staff have often experienced from 30 to 50 off-leash dogs at one time on the Alta Trail. Because of the ease of access and parking, Alta Trail is likely to be an alternative for those commercial dog walkers who would otherwise use Tiburon open space areas where there is now a permit requirement and limit of 6 dogs per walker.

¹ *Assessment of Visitor Activities at Six Sites Within Golden Gate National Recreation Area, December 2011*

Safety and Visitor Experience: In heavily used areas, especially areas popular with multiple user groups, limiting the number of dogs per commercial dog walker for this interim period would lessen the potential for conflict between user groups by allowing better control by commercial dog walkers. Additionally, a limit on the number of dogs would address the safety and visitor experience concerns of other users, including private dog walkers, who have been displaced from areas heavily used by commercial dog walkers where large groups of dogs are not always well controlled. Numerous comments on the draft Dog Management Plan/EIS and visitor complaints received by park staff have voiced safety and visitor experience concerns about large groups of dogs that are not adequately supervised. Additional control made possible by limiting the number of dogs walked at one time by commercial dog walkers would also address park employee concerns about working outdoors in areas heavily used by commercial dog walkers with large numbers of dogs.

Establish Control and Regulations: Research and interviews conducted as part of GGNRA's dog management planning project indicate that there are now well over 100 commercial dog walkers in the City and County of San Francisco. There are also commercial dog walkers who operate without a business license. Commercial dog walkers include individual dog walkers (who may or may not be licensed), as well as companies with several employees. There is at least one association for commercial dog walkers in San Francisco, the San Francisco Professional Dog Walkers Association (Prodog). In a July 14, 2013, San Francisco Chronicle article about San Francisco's new commercial dog walking ordinance, a spokesperson for ProDog estimated that there might be as many as 300 commercial dog walkers in San Francisco. In San Francisco, the GGNRA sites most often used by commercial dog walkers are Fort Funston, Crissy Field and Fort Mason, but commercial dog walkers are also seen at Baker Beach and Ocean Beach. Commercial dog walkers typically bring between four and ten dogs, or more, at a time to GGNRA sites and spend about one hour, twice a day, in the park.

Without this interim action, commercial dog walkers would be able to continue walking unlimited numbers of dogs in GGNRA sites where dog walking is currently allowed until the NPS has completed the GGNRA dog management planning process, which addresses both commercial and recreational dog walking. The dog management plan and its accompanying environmental impact statement (EIS) are well underway. Late Fall, 2014, NPS will develop and seek public comment on a rule that codifies the dog management plan's regulatory elements in the Code of Federal Regulations. A final rule is not anticipated until late 2015. When that rule is in place, the Interim Commercial Dog Walking Use Limit and Permit Requirement will expire.

D. BACKGROUND

The maximum number of dogs per commercial dog walker in this proposed interim compendium amendment was drawn from the permit conditions developed in the dog management planning process. The permit conditions - including the number of dogs allowed per dog walker - proposed in the preferred alternative of the draft Dog Management Plan/Environmental Impact Statement (draft plan/EIS) and the draft Dog Management Plan/Supplemental Environmental Impact Statement (draft plan/SEIS), were developed initially by the GGNRA Negotiated Rulemaking Committee for dog management (2006-2007). As one of the Committee's consensus agreements, they were incorporated in the preferred alternative of the draft Dog Management Plan/EIS released in 2011, and the draft Dog Management Plan/Supplemental EIS released September, 2013. During the public comment period on the draft Plan/EIS, the National Park Service (NPS) received multiple comments regarding the appropriate number of dogs allowed per dog walker. Some commenters expressed support for limiting the number at six dogs with strict guidelines. Other commenters, including some dog commercial walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker, with some noting that four or more dogs could be hard to control. Some commercial dog walkers noted the potential economic impacts to their businesses of limiting the number of dogs to a maximum of six, while other commenters requested that commercial dog walking not be allowed at all.

In proposing alternatives for the maximum number of dogs per walker in the draft plan/EIS, the NPS was concerned first and foremost with visitor experience and safety, as well as resource protection, key objectives of the plan. The NPS questioned whether a dog walker could consistently control more than six dogs in areas

open to voice control, of particular concern in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. The NPS was unable to find literature supporting the idea that more than six dogs would provide both visitor experience and safety, and resource protection. Based on public comment, feedback from the GGNRA Negotiated Rulemaking Committee for dog management, park staff observations, research on national and international best practices and law enforcement experience, the NPS believes that allowing more than six dogs total could negatively impact visitor experience and visitor and employee safety.

The preferred alternative proposed in GGNRA's draft Plan/EIS and SEIS would require that commercial and private dog walkers with more than three dogs obtain a permit; the permit would limit the number of dogs per walker to a maximum of six, and permits would be issued for only seven park sites, all of which are in either Marin or San Francisco counties. This proposed interim public use limit is similar in that it would impose a maximum of 6 dogs per dog walker; however, it would only address commercial dog walkers, and would not limit them to seven sites. Rather, all GGNRA sites open to dog walking in San Francisco and Marin would be available for commercial dog walkers under this interim action.

As indicated above, this interim restriction and permit requirement would remain in place until the NPS completes the planning and rulemaking processes associated with the dog management planning process. The NPS released the draft plan/SEIS on September 6, 2013 and the comment period closed on February 18, 2014. A final plan/EIS is anticipated in 2015, and a final rule in late 2015. The proposed interim restriction does not limit or otherwise affect the range of alternatives that will be considered in the broader dog management planning process.

E. APPLICABLE LAW AND POLICY

The NPS regulations allow superintendents to implement public use limits to protect park resources, equitably allocate use of areas, protect public health and safety, and avoid conflicts among user groups. Public use limits may be adopted following a written determination and publication of the use limitation in the park's Compendium. In addition, under 36 CFR § 1.6, Permits, the National Park Service may adopt a permit system to implement a public use limit enacted under 36 CFR §1.5.

This proposed interim use limit is consistent with NPS Management Policies, which allow the issuance of permits for special park uses that provide a benefit to an individual, group or organization rather than the public at large; that require authorization and some degree of management control to protect resources and the public interest and that are not prohibited by law or regulation. In that commercial dog walking is not a visitor-serving use, a permit is the proper authorizing mechanism rather than a commercial use authorization, which is intended to benefit the visiting public at large. This interim action allows continued access by commercial dog walkers to all GGNRA Marin and San Francisco sites open to dog walking, but in a manner that is protective of other park users. Use of the most popular dog walking sites in GGNRA is already heavy – additional unregulated use would aggravate issues among dog walkers both commercial and private, as well as impact or displace other users. The 1979 GGNRA Citizen's Advisory Commission Pet Policy did not address commercial dog walking, thus this interim action is not inconsistent with that policy.

This interim action is not of a nature, magnitude or duration such that it would result in a significant alternation of the public use patterns of the park. The expected duration of this proposed interim action is approximately two years, when the NPS intends to replace it with a special regulation published in the Code of Federal Regulations that will govern dog walking, including commercial dog walking, in GGNRA. The scope of this proposed action is limited, applying only to GGNRA lands in San Francisco and Marin counties where dog walking is allowed; GGNRA lands in San Mateo County would not be affected. In addition, this proposed action would only affect commercial dog walkers; private dog

walkers would not be affected. Commercial dog walkers are a subset of the dog walking that occurs on GGNRA lands, and only a portion of commercial dog walkers handle more than 6 dogs at one time. More importantly, the proposed action does not ban commercial dog walking. It allows the use to continue, with the requirement of a permit for those with more than 3 dogs, and a limit of 6 dogs, in San Francisco and Marin GGNRA sites.

This interim action would not adversely affect the natural, aesthetic or cultural values of park lands in Marin and San Francisco counties. Because this interim action limits the number of dogs per commercial dog walker, it potentially allows greater control of dogs, particularly in areas where dogs are currently allowed under voice control. Thus, this action would not adversely affect, and is likely to have a beneficial effect on natural, aesthetic and cultural values of park lands, by reducing the potential for multiple, large groups of dogs in park sites.

Adoption of the proposed action would not require a long-term or significant modification in the park's resource management objectives since it is an interim action and the park anticipates that it would be replaced by a final regulation in approximately two years. The proposed action is also consistent with the park's resource management objectives and broadly follows the goals and objectives of the GGNRA dog management draft Plan/EIS and SEIS, both of which considered the park's resource management objectives in developing the range of alternatives. This proposed action is also consistent with natural resource goals of the updated GGNRA General Management Plan, particularly the goal of maintaining the integrity and diversity of natural resources and systems and mitigating the effects of climate change and urban pressures.

The proposed interim restriction is not highly controversial. Multiple jurisdictions in the Bay Area, including the City and County of San Francisco, the Town of Tiburon, and Marin County Parks and Open Space, have recognized the need to impose reasonable restrictions on commercial dog walking and have done so; the most recent actions were in July of this year. The interim action proposed here was initially proposed by the GGNRA Negotiated Rulemaking Committee, and was further developed with much public input throughout the GGNRA dog management planning effort. This action is similar to the approach that is currently being used by the adjacent jurisdictions mentioned above.

This interim proposal is the minimum necessary action at this time; narrowly tailored to address the anticipated increase in commercial dog walking that is expected to result from the adoption of local ordinances regulating commercial dog walkers in San Francisco and Tiburon. Without this interim action, it is reasonably expected that GGNRA lands in San Francisco and Marin Counties could see an increase in the amount of commercial dog walkers with large groups of dogs, which in turn would affect the use and enjoyment of park lands by other visitors, including non-commercial dog walkers.

Special Park Use: This action is considered a special park use (NPS 2006 Management Policies 8.6). A special park use is an activity that takes place in a park area, and that

- Provides a benefit to an individual, group, or organization, rather than the public at large;
- Requires written authorization and some degree of NPS management to protect park resources and the public interest;
- Is not prohibited by law or regulation;
- Is not initiated, sponsored, or conducted by the NPS; and
- Is not managed under a concession contract, a recreation activity for which the NPS charges a fee, or a lease.

Furthermore, this action, when implemented with all the permit terms and conditions:

- Will not create an unacceptable impact on or impair park resources or values;
- Is not contrary to the purposes for which the park was established;

- Would not unreasonably disrupt the atmosphere of peace and tranquility of wilderness, natural, historic, or commemorative locations within the park;
- Would not unreasonably interfere with interpretive programs, visitor activities, visitor services, or NPS administrative activities;
- Would not substantially interfere with the operation of public facilities or the services of NPS concessioners or contractors;
- Would not create an unsafe or unhealthy environment for other visitors or employees;
- Would not result in conflict with other existing uses.

Connected Action (40 CFR Sec. 1508.25): This interim compendium action is related but not connected to the Commercial Dog Walking action being proposed in the Dog Management Plan EIS. This interim compendium action:

- does not trigger another action;
- can proceed independent of other actions occurring;
- is not interdependent on the implementation of the Commercial Dog Walking action described in the Dog Management Plan EIS;
- and does not depend on the Commercial Dog Walking action proposed in the Dog Management Plan EIS for its justification;

This interim compendium action meets the "independent utility" test in that regulating a commercial use i.e. Commercial Dog Walking would take place with or without the Commercial Dog Walking action proposed in the Dog Management Plan EIS.

Finally, this interim action is not expected to significantly displace commercial dog walkers to adjacent lands managed by other agencies. Both the Town of Tiburon and the Marin County Parks and Open Space District already have similar restrictions on commercial dog walking. In San Francisco, there may be some commercial dog walkers who prefer to use City and County of San Francisco lands, in that they would be allowed an additional 2 dogs per walker under the San Francisco permit. However, that difference is not expected to result in a significant amount of displacement from GGNRA lands to San Francisco-managed sites. Finally, there would be no displacement onto Presidio Trust (Trust) lands as a result of this action, in that the Trust is proposing a similar interim restriction on Trust lands, intended to be enacted in concert with the GGNRA interim restriction.

F. ENVIRONMENTAL SCREENING FORM (Informed Decision-Making)

1) Baseline (Existing) Condition

Public Use Baseline (Existing) Condition: As a public use, commercial dog walking is currently occurring on both GGNRA and Presidio Trust (GGNRA/Trust) lands, with commercial dog walkers walking dogs in numbers that range from 1-10, or more.

Change in Public Use Condition if Interim Permit System and Use Limit is Enacted: It is anticipated that commercial dog walkers would still use GGNRA/Trust parkland, but this proposal would limit them to six (6) dogs per dog walker. This may result in more commercial dog walking trips to GGNRA/Trust with the same total number of dogs²; or the same number of trips to GGNRA/Trust,

² A commercial dog walker may have been taking 12 dogs per trip, a number currently possible only on GGNRA lands with no limit on the number of dogs per dog walker. With the proposed restriction, this same commercial dog walker may take two trips with 6 dogs per trip. However, additional trips to accommodate 12 dogs would also be necessary for use of non-NPS lands in San Francisco (CCSF) and Marin County (Town of Tiburon) managed by other agencies that currently have limits of 8 or 6 dogs per commercial dog walker.

which would result in a net decrease in number of dogs. In either scenario, the overall net change in commercial dog walker trips and/or net change in number of dogs walked is expected to be negligible. This negligible change in net trips or dog numbers is anticipated to have an associated negligible to beneficial environmental effect from the baseline (existing) condition.

2) NPS Screening Form

Identify potential effects to the following physical, natural, or cultural resources	No Effect	Negligible Effects	Minor Effects	Exceeds Minor Effects	Notes
1. Geologic resources – soils, bedrock, streambeds, etc.		Negligible			More effective dog management made possible by limiting the number of dogs per commercial walker could reduce impacts on soils caused through physical damage (such as digging and dog waste), and could have beneficial impacts compared to the existing condition.
2. From geohazards	No				
3. Air quality	No				
4. Soundscapes	No				
5. Water quality or quantity		Negligible			More effective dog management made possible by limiting the number of dogs per commercial walker could increase the removal of dog waste, which could decrease the potential for nutrients and pathogens from entering water bodies, but not to any measurable degree.
6. Streamflow characteristics	No				
7. Marine or estuarine resources	No				
8. Floodplains or wetlands		Negligible			More effective dog management made possible by limiting the number of dogs per commercial walker could promote appropriate dog behavior, including keeping dogs from entering wetland areas that may be signed but not fenced.
9. Land use, including occupancy, income, values, ownership, type of use		Negligible			The action applies only to GGNRA lands in San Francisco and Marin Counties where dog walking is allowed, and is not expected to displace commercial dog walkers in any significant degree to adjacent

					lands managed by other agencies.
10. Rare or unusual vegetation – old growth timber, riparian, alpine	No				
11. Species of special concern (plant or animal; state or federal listed or proposed for listing) or their habitat		Negligible			More effective dog management made possible by limiting the number of dogs per commercial walker could reduce impacts to wildlife (due to barking and chasing) and associated habitat within easily accessible off trail areas, and could have beneficial impacts compared to the existing condition. Although limited in its use, some areas have fencing that delineates the boundary where sensitive habitat exists, and in most of these areas the fence is not fully exclusion proof and off-leash dogs could access these areas. In these areas of passive fencing, more effective commercial dog management could decrease dogs entering fenced areas because dog walkers would have better control due to the restriction in the number of dogs per commercial dog walker. However, fencing or access restrictions are not proposed as part of this action, only a reduction in numbers with permitting.
12. Unique ecosystems, biosphere reserves, World Heritage Sites	No				
13. Unique or important wildlife or wildlife habitat		Negligible			More effective dog management made possible by limiting the number of dogs per commercial walker could reduce impacts to wildlife (due to barking and chasing) and associated habitat within easily accessible off trail areas, but not to any measurable degree. Although limited in its use, some areas have fencing that delineates the boundary where sensitive habitat exists, and in most of these areas the fence is not fully exclusion proof and off-leash dogs

					could access these areas. In these areas of passive fencing, more effective dog management could decrease dogs entering fenced areas because dog walkers would have better control due to the restriction in the number of dogs per commercial dog walker. However, fencing or access restrictions are not proposed as part of this action, only a reduction in numbers with permitting.
14. Unique or important fish or fish habitat	No				
15. Introduce or promote non-native species (plant or animal)	No				
16. Recreation resources, including supply, demand, visitation, activities, etc.		Negligible			Limitations on the maximum number of dogs per walker and potentially greater control of dogs would benefit recreationists whose experience of the park is adversely impacted by large groups of off-leash dogs.
17. Visitor experience, aesthetic resources			Minor		Commercial dog management would not diminish the current visitor experience and could possibly improve it by reducing the number of dogs per commercial dog walker. In heavily used areas, especially areas popular with multiple user groups, limiting the number of dogs per dog walker for this interim period would lessen the potential for conflict between user groups by allowing better control of dogs by commercial dog walkers. Additionally, a limit on the number of dogs would address the safety and visitor experience concerns of other users, including private dog walkers, some of whom have been displaced from areas heavily used by commercial dog walkers where large groups of dogs are not always well controlled.
18. Archeological resources	No				
19.	No				

Prehistoric/historic structure					
20. Cultural landscapes		Negligible			More effective dog management made possible by limiting the number of dogs per commercial walker would have beneficial impacts in areas of sensitive resources where dog activities occur.
21. Ethnographic resources	No				
22. Museum collections (objects, specimens, and archival and manuscript collections)	No				
23. Socioeconomics, including employment, occupation, income changes, tax base, infrastructure		Negligible			This interim permit requirement would increase expenses of commercial dog walkers as they would have to obtain an NPS permit to conduct their business activity on federal parklands. However, the permit cost averages just over \$1.00 per day, per year. It is expected that commercial dog walkers could pass this expense to their clients, and thus there could be a negligible effect on their income. To walk the same number of dogs walked prior to this permit and limit requirement, commercial dog walkers may have to increase the number of trips, which could increase their transportation costs. However, the overall net change in commercial dog walker trips, and thus transportation costs, is expected to be negligible.
24. Minority and low income populations, ethnography, size, migration patterns, etc.	No				
25. Energy resources	No				
26. Other agency or tribal land use		Negligible			The action would be similar to and consistent with surrounding

plans or policies					jurisdictions' recent actions to license and regulate commercial dog walking businesses operating on their respective lands, including the City and County of San Francisco, Marin County Parks and Open Space, Town of Tiburon and the Presidio Trust.
27. Resource, including energy, conservation potential, sustainability	No				
28. Urban quality, gateway communities, etc.		Negligible			Limiting the number of dogs per commercial walker would potentially result in greater control of dogs and reduce the size of packs of dogs, would create an atmosphere that is more inviting and accessible in gateway areas.
29. Long-term management of resources or land/resource productivity	No				This would be a narrow, interim action only.
30. Other important environment resources (e.g. geothermal, paleontological resources)?	No				

D. MANDATORY CRITERIA

Mandatory Criteria: If implemented, would the proposal:	Yes	No	N/A	Comment or Data Needed to Determine
A. Have significant impacts on public health or safety?		X		
B. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas?		X		

C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?		X		
D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?		X		
E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?		X		This would be an interim action and would only remain in effect until a final special regulation for dog walking, including commercial dog walking, is promulgated as anticipated in late 2015.
F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?		X		This action is related to actions that have already been undertaken by neighboring agencies. The effects of all of these actions when considered together are not cumulatively significant.
G. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office?		X		
H. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?		X		
I. Violate a federal law, or a state, local, or tribal law or requirement imposed for the protection of the environment?		X		
J. Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898)?		X		
K. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007)?		X		
L. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the		X		

introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112)?				
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G. RESPONSE TO SUBSTANTIVE PUBLIC COMMENT

The NPS publicly noticed the *Interim Commerical Dog Walking Compendium Amendment* on March 14 for 30 days ending on April 14, 2014, and while not required, invited public comment. A total of 584 correspondences were received.

Public comments received addressed the following broad themes:

- **Theme 1 - Number of dogs:** GGNRA received comments requesting that GGNRA allow more than six dogs, or require fewer than six dogs. There were concerns with a commercial dog walker's ability to control up to six dogs, or more. There were concerns with impacts to commercial dog walking businesses and the impacts to adjacent parks from limiting the number of dogs to six. There were also comments requesting greater consistency with dog limits set by the City of San Francisco.

Responses:

- See Sections C, D, and E., above, for a description of GGNRA's rationale behind limits on the number of dogs, and why GGNRA does not believe that the limit of 8 dogs as adopted by the City and County of San Francisco is appropriate for GGNRA.
- Regarding impacts to businesses, CEQ regulations at 40 CFR 1508.14 state that "economic or social effects are not intended by themselves to require preparation of an environmental impact statement." Nonetheless, GGNRA evaluated the impacts of regulating commercial dog walking in its long-term dog management plan and Supplemental EIS. The analysis there reviewed a more restrictive proposal than what is currently proposed, and found that impacts to socioeconomics would likely not exceed negligible within the context of employment within the San Francisco metropolitan statistical area. Accordingly, this interim action, which is much narrower in scope and does not restrict access to any sites, does not restrict the area available within a site, does not impose time of use requirements, and which imposes relatively minor permitting, insurance and numerical requirements on commercial dog walkers, would not have a significant impact.
- The impact conclusions in the long-term dog management plan/SEIS, which evaluated a more restrictive proposal than the one proposed here, determined that the impacts of possible redistribution of dog walkers would not be significant. This interim action is both short-term and limited in scope, and while there could be adverse effects to adjacent areas from commercial dog walkers with more than six dogs, several nearby jurisdictions have adopted ordinances limiting commercial dog walkers to a maximum of six or eight dogs. The proliferation of restrictions on commercial dog walking in areas around GGNRA will minimize the possible re-distributional effects of this interim action. For these reasons, GGNRA reasonably believes that any impacts due to redistribution from this narrow interim action will not be significant. It is also worth noting that the San Francisco Recreation and Park Department's Final Dog Policy prohibits dogs in all Sensitive Habitat Areas, Athletic Fields, Tennis/Basketball/Volleyball courts, Children's Play Areas, and other key areas prohibited by Park Code Section 5.02, thereby further minimizing any re-distributional effects to park users and park resources. And, while the City and County of San Francisco's Department of Animal Care and Control enforces a

limit of eight(8) dogs, their CDW informational pamphlet recommends not more than six(6).

- **Theme 2 – Training and Certification Requirements:** Concerns were expressed regarding training and certification in order to obtain the NPS permit. Some commenters noted that experienced commercial dog walkers do not need required training and certification, and expressed a desire for NPS to honor CCSF training and certificate requirements to relieve any financial burden and promote efficiency. Other commenters noted that training and certification promotes responsibility, safety, and education.

Response:

- GGNRA believes that training and certification are important components of any permit program. We have, however, sought to streamline training and certification where possible. To that end, GGNRA will follow the same requirements as the county jurisdictions in which commercial dog walking will take place. If a commercial dog walker seeks to conduct commercial dog walking on GGNRA lands in both San Francisco and Marin Counties, the commercial operator must meet requirements for both counties. If a commercial dog walking applicant will only engage in commercial dog walking activities on GGNRA lands in San Francisco County, the commercial dog walker must either complete one of the courses accepted by San Francisco Animal Care and Control or show proof of three consecutive years as a commercial dog walker in good standing. If the applicant only seeks to conduct commercial dog walking on GGNRA lands in the county of Marin, the commercial dog walker must have completed the Marin Pet Care Association (MPCA) Trail Manners Class, or one of the courses accepted in San Francisco. If the commercial dog walker has completed one of these programs in the past, s/he will not need to re-take it, but rather must provide documentation of completion to NPS as part of their application process.
- **Theme 3 – Permit costs and financial burden:** Some commenters expressed concerns regarding the permit fee, which they believed was too high and unfair, and as public land, should be reduced or removed. Some commenters noted that the required fee would create a financial burden for their businesses.
- Response:**
- The NPS is expressly authorized by statute to recover costs related to special park uses. Under the authority of 16 U.S.C. § 3a, the NPS may recover from a Permittee the agency's costs incurred in processing a Special Use Permit application and monitoring the permitted activity. GGNRA informs applicants early in the process that they will be responsible for reimbursing the park for all costs incurred by the park in processing the application and monitoring the permitted activity. The annual Commercial Dog Walking (CDW) permit fees are based on cost recovery estimates relating to the management and administration of CDW permits. For the 2014 permit, which will be valid through January 31st, 2015, the \$300 Company Badge fee, however, will be prorated according to the date of issue. Because the permit fee to be assessed by GGNRA is based on the actual costs of administering this program, the fee is fair for a special use authorized in a national park setting.
- **Theme 4 – Timing of the proposal:** Some commenters expressed concerns that there would not be enough time for commercial dog walking businesses to prepare for implementation, complete the application process and obtain a permit.
- Response:**
- Application forms will be released on May 27, 2014. GGNRA will begin processing permit applications on June 2, 2014. It will take no longer than 30 days after receipt of completed qualifying applications to issue a permit. Applicants who have submitted completed application packages will be given a “reference number” as proof they have

begun the process while they wait to receive the permit and badge. A transition period will be implemented until July 15, 2014, for enforcement to allow submission of permit application packages and receipt of the GGNRA permit. All commercial dogwalkers on GGNRA lands should carry the “reference number” documentation (received as a receipt of a complete CDW permit package from GGNRA) with them if they engage in commercial dog walking activities in GGNRA during this transition period.

- **Theme 5 – Inappropriate use of NEPA Categorical Exclusion:** Some commenters expressed concerns that the use of a categorical exclusion (CE) is inappropriate because the impacts of this proposed action would be significant, and because NPS exception criteria (extraordinary circumstances) apply. Some commenters also stated that this was a connected action, and should not be considered separately from the long-term dog management plan/EIS.

Responses:

- This action is short-term and interim in nature. It makes no decisions regarding the park’s long-term solution to commercial dog walking, but rather, simply seeks to manage and minimize the impacts of an existing use. Some commenters requested that GGNRA compare this action against a fictional baseline in which there is no commercial or private dog walking. Forecasting impacts against a fictional baseline would artificially inflate impacts. Instead, in determining level of impact, GGNRA compared its proposal to the existing condition, in which commercial dog walking inside GGNRA is unregulated, with no numerical caps, permitting, training, or insurance requirements, and where commercial dog walking external to GGNRA is regulated. When comparing this interim action to the existing condition of unregulated use, this interim action is beneficial to park resources, with minimal effects to adjacent parklands as described above.
- Some commenters noted that the NPS exceptional criteria (extraordinary circumstances) preclude the use of a CE, again asserting use of a fictional baseline in which GGNRA moves from a condition with no commercial dog walking to one in which it is allowed. Such a baseline does not reflect the well-established reality on the ground in GGNRA. As noted above, when measured against the existing condition, restricting commercial dog walking through this interim action results in primarily beneficial effects, including to park visitors and public health and safety, and to wildlife, including sensitive species.
- One commenter noted that there could be cumulative effects, but did not point to any beyond “other dog management issues.” The long-term dog management plan/SEIS, which analyzed a more comprehensive dog management proposal including but not limited to commercial dog walking, did not find cumulatively significant effects. Similarly, GGNRA has not identified cumulatively significant impacts for this action.
- The effects of this action are not highly controversial. The need to regulate commercial dog walking was one of the only areas of consensus achieved by the GGNRA’s Dog Management Negotiated Rulemaking Committee, and the limit of six (6) was a number recommended by that Committee. Surrounding jurisdictions, including the City and County of San Francisco, the Town of Tiburon, and Marin County Parks and Open Space, all have adopted restrictions on commercial dog walking activities. These actions demonstrate the increased acceptance of regulations on this type of activity.
- This action does not establish a precedent for future actions. It is an interim measure, limited in both duration and scope, until a decision can be made regarding commercial dog walking in the long-term dog management plan/EIS. The long-term plan/EIS contains a range of alternatives regarding commercial dog walking, including regulations requiring permits with time and place requirements, as well as the prohibition of commercial dog walking. No decision will be made on the long-term management of commercial dog walking until the signing of a Record of Decision and Final Rule are promulgated.
- See Section E., Applicable Law and Policy, above, for a description of why this is not a connected action.

- **Theme 6 – Consistency with NPS Organic Act, GGNRA Enabling Legislation, and NPS Management Policies:** Some commenters expressed concerns that the interim action is inconsistent with the NPS Organic Act, GGNRA Enabling Legislation, and NPS Management Policies.

Response:

- See Section E., Applicable Law and Policy, above, for a description of conformance to applicable law and policy. This interim action, which reduces the number of dogs that any one commercial dog walker can handle at one time, would not adversely affect, and is likely to have a beneficial effect on natural, aesthetic and cultural values of park lands. Accordingly, this interim action furthers the conservation mandate contained in the NPS Organic Act and is consistent with the GGNRA Enabling Legislation which directs the NPS to preserve the recreation area as far as possible in its natural setting and to apply sound principles of land use planning and management. This action creates beneficial impacts compared to the existing condition, and does not create significant impacts, unacceptable impacts or impairment.

H. DECISION / IMPLEMENTATION PROCESS

This proposal was released to the public for a 30-day public notice period, from March 14 to April 14, 2014, during which NPS accepted public comments. Following the 30-day public notice period, NPS reviewed public comments and prepared responses to comments. The final decision by the GGNRA Superintendent was made on May 27, 2014. Implementing the decision will require amending GGNRA's Compendium. Public notification of the Compendium amendment will be made through community outreach, outreach to dog walking organizations, a news release, brochures and/or signage, and the Park's website. The effective date of the Compendium amendment will be June 2, 2014.



United States Department of the Interior

National Park Service
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, California 94123

Form 10-114
Rev. Jan. 00

SPECIAL USE PERMIT

Name of Use: **Commercial Dog Walking**

Date Permit Reviewed 2014

Expires

Permit No. 8140-2501 [REDACTED]

Name Of Area: [REDACTED]

Long Term ☒

Short Term

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] ("Permittee") and its approved Company Badge Holders are hereby authorized during the period from **DATE to DATE** to use the areas listed as open to dog walking in Attachments A and B of this permit which are located within the Golden Gate National Recreation Area (GGNRA) and comprise lands under the administrative jurisdiction of the National Park Service.

For the purpose of:

Commercial Dog Walking

Authorizing legislation or other authority (see DO-53): 36 CFR Section 1.6.

NEPA & NHPA Compliance: CATEGORICALLY EXCLUDED ☒ EA/FONSI ☐ EIS ☐ OTHER
APPROVED PLANS

PERFORMANCE BOND: Required Not Required ☒ Amount \$0

LIABILITY INSURANCE: Required ☒ Not Required Amount \$2,000,000 aggregate/\$1,000,000 per occurrence.

ISSUANCE of this permit is subject to receipt of Permittee's payment of \$____.00 to the U.S. Department of the Interior, National Park Service which consists of a \$300 badge fee for each Company Badge Holder and a separate \$75 application fee.

The undersigned hereby accepts this permit subject to the terms, covenants, obligations, and reservations, expressed or implied herein.

Permittee: [REDACTED]
Signature Organization Date

Authorizing Official: [REDACTED]
Signature Title Date

I. GENERAL CONDITIONS

1. The term “Company Badge Holders” means those individuals issued a Company Badge and authorized by the National Park Service to engage in commercial dog walking activities on behalf of the Permittee. Each approved Company Badge Holder shall be required to sign a separate certification that he/she has read and understands the terms of this Permit prior to being issued a Company Badge. Company Badge Holders are considered to be agents of the Permittee for all purposes under this Permit.
2. Permittee and its agents are prohibited from giving false information in connection with the application for this permit and in connection with the exercise of the privilege granted hereunder. [36 CFR Sections 2.32(a)(3)].
3. The exercise of the privilege granted under this permit is subject to the supervision of the Superintendent or his designee at all times. This Permit conveys no right, title or interest in any real or personal property and is merely a temporary license for the non-possessory use of areas within the GGNRA. Possession of this permit does not guarantee entry into GGNRA. Permittee, on behalf of itself and its agents, expressly acknowledges that the Superintendent or his designee may restrict entry or close portions of the GGNRA to the public at any time.
4. In carrying out activities under this permit, Permittee and its agents, at Permittee’s expense, shall comply with all applicable laws and regulations, including those found in 36 CFR Parts 1-5.
5. Any failure by the Permittee or its agents to comply with applicable laws and regulations or with any of the terms and conditions of this permit may result in the immediate suspension or revocation of the permit as determined in the sole discretion of the Superintendent or his designee. Permittee expressly acknowledges the revocable nature of this permit. If this permit is revoked, Permittee and its Company Badge Holders may not engage in any commercial dog walking activities that require a commercial dog walking permit.
6. This permit may be revoked in the discretion of the Superintendent or his designee without notice if the exercise of the privilege authorized hereunder results in or threatens to damage resources or facilities.
7. Permittee hereby covenants and agrees to indemnify, reimburse, defend, save and hold harmless the United States, its agents, and employees for and from any and all liabilities, claims, demands, damages, losses, charges, judgments, expenses, costs and the like, including reasonable attorney fees, for any loss or destruction of or damage to any property, or for the death of or injury to any person, of any nature whatsoever and by whomever made, which may arise out of or be incident to the activities of the Permittee or its agents, whether or not the same shall be occasioned by the negligence or lack of diligence of the Permittee or its agents.
8. Permittee agrees to carry general liability insurance against claims occasioned by the acts or omissions of the Permittee or its agents in carrying out activities under this permit. The policy shall be in the amount of \$2,000,000 and underwritten by a United States company naming the United States of America as **additionally insured**. The Permittee agrees to provide the Superintendent with a Certificate of Insurance with the proper endorsements prior to the effective date of the permit.
9. The Permittee shall be responsible for reimbursing the United States for all costs associated with

the provision of necessary services associated with this permit, such as costs resulting from cliff rescues of dogs. The United States will bill Permittee for such costs. In addition, Permittee may be required to reimburse the United States for cleanup or repair of damages to facilities or resources administered by the National Park Service or the Presidio Trust that are occasioned by the activities of the Permittee or its agents under this permit, normal wear and tear excepted.

10. The Permittee represents and it is a condition of acceptance of this permit that, pursuant to 41 U.S.C. 22, "No Member of Congress shall be admitted to any share or part of any contract or agreement made, entered into, or accepted by or on behalf of the United States, or to any benefit to arise thereupon."
11. Nothing herein contained shall be construed as binding the National Park Service to expend in any one fiscal year any sum in excess of appropriations made by Congress or administratively allocated for the purpose of this permit for the fiscal year, or to involve the National Park Service in any contract or other obligation for the further expenditure of money in excess of such appropriations or allocations.
12. This permit is personal to the Permittee and may not be transferred or assigned.
13. This permit terminates on the date listed on the cover page of this permit. There is no right to renewal of this permit. If Permittee wishes to exercise the privilege of commercial dog walking for an additional permit term, Permittee must apply for a new permit and pay all associated fees and costs.

II. SPECIAL PARK CONDITIONS

1. This permit authorizes each of Permittee's Company Badge Holders to walk more than three but not more than six dogs at one time for consideration in the areas listed as open to dog walking in Attachments A and B. A Company Badge Holder is prohibited from walking more than six dogs for consideration at one time. A permit is not needed to walk three or fewer dogs, even when done for consideration.
2. While engaging in commercial dog walking activities, the Permittee and its agents shall ensure that the commercial dog walker badge provided by the GGNRA is visibly displayed on the Company Badge Holder's person at all times in a manner such that it is easily visible from a distance of 50 feet. Additionally, the badge must be provided upon request to any person authorized to enforce this permit.
3. Permittee and its agents must remain in control of the dogs under their supervision at all times. In case of emergency, Permittee acknowledges that Permittee and its agents have the authority to make decisions regarding the dogs under their control when requested by a person authorized to enforce this permit.
4. Permittee and its agents must clean up all excrement from the dogs under their control and properly dispose of all dog waste in trash receptacles or by removing it from GGNRA.
5. Permittee expressly acknowledges that Permittee has read and understood the rules and regulations that pertain to dog walking in GGNRA (including the regulations in 36 CFR Section 2.15), understands which sites are open and closed to voice-control dog walking per the 1979 Pet Policy, and agrees to abide by the same at all times when exercising the privilege authorized by this permit. Permittee further acknowledges that it will provide comprehensive training and instruction to its Company Badge Holders regarding the foregoing provisions.

6. Permittee and its agents must park its vehicles legally. Permittee and its agents are not authorized to drive vehicles off pavement, except where expressly permitted, and may not allow their vehicles to impede access for other park visitors.
7. Permittee and its agents shall exercise the privilege authorized under this permit in a manner that ensures the safety of federal employees and their agents, as well as the safety of park visitors and their dogs. In addition, Permittee and its agents shall ensure that the dogs under their control do not interfere with the activities of other park visitors or with the administrative activities of federal employees and their agents.
8. Advertising for the authorized activity shall not state or imply endorsement by GGNRA, the Presidio Trust or the National Park Service. Upon request, the Permittee will provide the National Park Service with copies of advertising brochures and any other materials related to activities within areas administered by the National Park Service or the Presidio Trust.

SAMPLE

ATTACHMENT A: SPECIAL CONDITIONS FOR GGNRA SAN FRANCISCO LANDS

1. ***Areas Open For Voice Control Dog Walking (On leash dog walking also allowed)*** *(Consult the 1979 Pet Policy for specifics on when off leash dog walking is allowed at some of the areas listed below)*
 - Baker Beach, north of Lobos Creek
 - Crissy Field (excluding the Wildlife Protection Area at the west end of Crissy field beach where leashes are required all year except from May 15 to July 1)
 - Fort Funston (excluding the 12-acre closure in northwest Ft. Funston and the northern end of the Coastal trail, closed due to erosion.)
 - Fort Miley
 - Lands End
 - Ocean Beach (excluding the Plover Protection Area from Sloat Blvd. north to Stairwell 21 where where leashes are required all year except from May 15 to July 1)

1. ***Areas Open For On Leash Dog Walking Only***
 - All trails not closed to dogs
 - All parking lots and picnic areas
 - Fort Point lands, excluding inside the fort and the pier
 - Fort Mason
 - Sutro Heights

2. ***Areas Closed To Dogs***

IN THE CRISSY FIELD AREA

 - Crissy Field Tidal Marsh and Lagoon

IN THE FORT FUNSTON AREA

 - Fort Funston Habitat Protection Area
 - Coastal Trail, intersection of Horse trail to Great Highway, closed due to erosion

IN THE FORT POINT AREA

 - Fort Point (inside historic fort)
 - Fort Point pier (Torpedo Wharf)

IN PRESIDIO AREA A

 - Battery to Bluffs Trail
 - China Beach site
 - Lobos Creek
 - Marshall Beach

ATTACHMENT B: SPECIAL CONDITIONS FOR GGNRA MARIN COUNTY LANDS

2. Areas Open For Voice Control Dog Walking (On leash dog walking also allowed)

- Alta Avenue between Marin City/Oakwood Valley
- Homestead Valley
- Muir Beach
- Oakwood Valley Fire Road, and Oakwood Valley Trail from junction with Oakwood Valley Road to Alta Avenue
- Rodeo Beach and South Rodeo Beach
- Three Marin Headlands trail corridors:
 1. Coastal Trail from Golden Gate Bridge to junction with Wolf Ridge Trail;
 2. Loop Trail from Rodeo Beach parking lot up Coastal Trail paved road (Old Bunker Road) near Battery Townsley and return to Rodeo Beach on paved road;
 3. Wolf Ridge Loop (Coastal Trail to Wolf Ridge Trail; Wolf Ridge Trail to Miwok Trail; Miwok Trail back down to Coastal Trail).

3. Areas Open For On Leash Dog Walking Only

- All parking lots and picnic areas
- County View Road and Marin Drive connector trails to North Miwok Trail
- Fort Baker
- Oakwood Valley Trail to the junction with Oakwood Valley Fire Road
- Rhubarb Trail
- Stinson Beach, parking lots/picnic areas only
- Four Marin Headlands Trail corridors:
 1. Coast Trail between Hill 88 (junction of Coastal Trail and Wolf Ridge Trail) and Muir Beach
 2. Miwok Trail between Tennessee Valley parking lot and Highway 1 (North Miwok Trail)
 3. Fire road around Battery Smith-Guthrie
 4. Trail to South Rodeo Beach

4. Areas Closed To Dogs**IN THE FORT BAKER AREA**

- Chapel Trail
- Fort Baker Pier

IN THE MARIN HEADLANDS AREA

- Alta Trail (only between Oakwood Valley trail intersection and Wolfback Ridge Road)
- Bicentennial Campground
- Bobcat Trail
- Coyote Ridge Trail
- Dias Ridge Trail
- Fox Trail
- Green Gulch Trail
- Hawk Campground and Trail
- Haypress Campground and Trail
- Kirby Cove area
- Lower Fisherman Trail and Beach
- Marincello Road
- Middle Green Gulch Trail
- Miwok Cutoff Trail
- Miwok Trail, between Wolf Ridge and Bobcat Trail
- Morning Sun Trail

- Old Springs Trail
- Point Bonita Lighthouse Trail
- Rodeo Avenue Trail
- Rodeo Beach Lagoon
- Rodeo Lake
- Rodeo Valley Trail
- SCA Trail
- Slacker Hill Trail
- Tennessee Valley beach
- Tennessee Valley Trail from parking lot to beach
- Upper Fisherman Trail and beach

IN THE MUIR BEACH AREA

- Big Lagoon
- Owl Trail
- Redwood Creek

IN THE MUIR WOODS AREA

- Muir Woods National Monument
- Redwood Creek Trail

IN THE STINSON BEACH AREA

- Coast Trail
- Dipsea Trail
- Matt Davis Trail
- McKennan Trail
- Willow Camp Fire Road
- Stinson Beach (beach only)

SAMPLE

Attachment C

The text of the Compendium amendment is as follows:

PART 1 – General Provisions

36 CFR § 1.6 Permits

☐ COMMERCIAL DOG WALKING

- (a) The walking of more than six dogs at one time by any one person for consideration (commercial dog walking) is prohibited within San Francisco County and Marin County sites administered by Golden Gate National Recreation Area (GGNRA).
- (b) The walking of more than three dogs, with a limit of six dogs, at one time by any one person for consideration (commercial dog walking) within San Francisco County and Marin County sites administered by GGNRA, where dog walking is otherwise allowed, is hereby authorized provided that:
 - i. That person has a valid commercial dog walking permit issued by GGNRA;
 - ii. The walking of more than three dogs, with a limit of six dogs, is done pursuant to the conditions of that permit; and
 - iii. The commercial dog walker badge issued to the permittee by GGNRA shall be visibly displayed at all times as directed in the permit while the permittee is engaging in commercial dog walking activities, and shall be provided upon request to any person authorized to enforce this provision.

This Compendium amendment will remain in effect until the final special regulation for dog walking in GGNRA is promulgated, which is anticipated in late 2015.