

**THE PRESIDIO TRUST**

**Proposed Rule:**

**Public Use Limit on Commercial Dog Walking; Revised  
Disposal Conditions**

**Public Comments**

**November 21, 2012 – February 25, 2013**

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**PRESIDIO TRUST PUBLIC BOARD MEETING,  
NOVEMBER 29, 2012 – SUMMARY OF PUBLIC COMMENTS ON  
COMMERCIAL DOG MANAGEMENT AND TRANSCRIPT**

**Presidio Trust Public Board Meeting**  
**November 29, 2012**  
**Summary of Public Comments**  
**Commercial Dog Management**

Scott Weiner: City Supervisor, District 8. Really good opportunity for the city and Presidio to work together on a common issue, specifically how to ensure a professional dog-walking service and responsible use of public lands. Gives brief history of city legislation providing some basic regulations and conduct rules for professional dog walkers using city properties. Commercial dog walker associations support legislation because it professionalizes the industry. Met with the Presidio Trust and GGNRA because of the overlap in terms of dog walker use. Supervisor then reviews basic elements of the legislation: permit requirement, general rules of conduct, initial and annual renewal fees, liability insurance, training. Must carry leashes for all dogs and provide easy access to water for dogs. Have to clean up after the dog. Says most debated, controversial section is the maximum number of dogs (eight). If there's a problem, could be changed in the future. Announces the legislation will go into effect on July 1<sup>st</sup> of next year, and thinks it will be a good thing.

Karen Cook: Presidio Trust General Counsel. Makes clear that the proposed rule is not intended to address the larger question of whether pets in the Presidio must be on leash or may be off leash. GGNRA going through a rule-making process. Trust is participating in process as a cooperative agency and submitted written comments. Likely be another year or so before process is completed, so Trust is essentially standing by while rulemaking is underway. When completed, Trust will take action or not. Presidio is “hard up” against city and will likely see an influx of commercial dog walkers

looking to avoid paying fees or having to adhere to city restrictions. Trust not requiring a separate permit, not a parallel permitting process. Rule simply states that a commercial dog walker walking a minimum of four dogs must have a city permit. Rule won't take effect until the city begins issuing their permits. Assuming that a commercial dog walker does have a permit issued by the city and is otherwise in compliance with the regulations that are effective in the Presidio, they would be in compliance with this rule. In response to a question by Trust Executive Director Craig Middleton, Ms. Cook then reviews process for adopting the proposed rule, including Federal Register noticing, and encourages public to submit written comments, which will be responded to before publishing the final rule.

Sally Stephens: With San Francisco Dog Owners Group, SF DOG. Supports professional dog walker legislation and permits. Good for Presidio to have similar legislation and makes sense to use city permits. GGNRA's draft EIS indicates no solid scientific evidence that dogs cause significant negative impacts on resources and other visitors. Encourages Trust to consider off-leash areas not in context of this ruling but in the future so there's no question or confusion where dogs can be off-leash.

Nancy Stafford: Co-Director of San Francisco Professional Dog Walkers Association, PRODOG. Supports proposed rule accepting city permits so "everyone is on the same page." Unfortunate Trust chose not to officially participate in the negotiated rule making. Urges the Trust to use this rule as an opportunity to work with

professional dog walkers and dog owners to establish a dog policy that recognizes the need for off-leash access. Asserts commercial dog walking has been going on for many years in the Presidio. Rule will protect the park by giving rules and regulations for dog walkers. Doesn't believe rule will increase the number of professional dog walkers in the park. No scientific evidence that dogs have any more of a negative impact than many other types of recreational activities.

Amy Meyer: Pleased that rule will not be implemented until July “so there's time to think it through.” Asks how the Trust will monitor the use and impact that the dogs create after rule goes into effect and then use that information to make modifications to rule.

Matthew Zlatunich: Park visitor who says he has been negatively impacted by commercial dog walkers in the park. Estimates that there are about 500 dogs walked by commercial dog walkers daily in the Presidio. “Not a good plan.”

Jan Blum: Presidio volunteer for over 10 years. Erroneously states that the city would allow up to nine dogs to be walked by commercial dog walkers at one time. Main concern is how the Trust will enforce on-leash dog walking policy because enforcement has been lax. Without appropriate budget and staff, seems “unrealistic” the Trust will be able to control dogs and dog walkers. What areas and times of day will be made off-limit to dog walkers? Says the Trust is inviting out-of-compliance dog walkers to “flood” Area A where rulemaking won't be completed for another two years. Encourages

Trust to consider 6 as the maximum number of dogs that a commercial dog walker would be able to walk at one time – the same as the NPS proposes. Thinks compliance is going to be an issue and that new rule needs environmental review.

David Andersen: Presidio resident. Recounts recent experience of being “turned off” by witnessing several professional dog walkers at Mountain Lake with 8 to 11 dogs each and half off-leash. States that he walks the Battery to Bluff Trail 4 to 6 times weekly, which is clearly marked as no pets. Observes dogs or dog tracks about half the time so the problem with compliance and enforcement is real, especially given budget issues and manpower shortages.

JoAnn Zlatunich: Richmond District neighbor for over 20 years and park user and volunteer. Says she has been negatively impacted by professional dog walking. Applauds the city for putting permit process in place but feels commercial dog walking is “incongruent” with Trust objectives. Everybody brings their dogs to the GGNRA and many others are afraid of dogs. Commercial dog walking should be prohibited altogether.

Gary Fergus: Serves on the board of the Crissy Field Dog Group. Commends the Trust and the city for addressing an important issue, and for the legislation being consistent. Urges the Trust Board to consider that responsible dog walking by licensed professionals with rules of conduct set up and aimed at addressing some of the concerns just heard. His organization does not support uncontrolled dogs or professional dog walkers that cannot manage their dogs. Contends

that there is ample evidence there can be “coexistence” between dog owners and other park users.

**PUBLIC COMMENTS ON COMMERCIAL DOG MANAGEMENT**  
**PRESIDIO TRUST PUBLIC BOARD MEETING – November 29, 2012**

**NOTE: The following is excerpted from the best transcript available of the public Board meeting of the Presidio Trust Board of Directors held on November 29, 2012. It is based upon an audio recording of the meeting.**

Scott Wiener: Here we go, is that better? Everyone, I'm Scott Wiener, member of the San Francisco Board of Supervisors, and thanks for having me here tonight. This is a really good opportunity for the City and Presidio to work together on an issue that we share in common. Specifically, how to ensure a really great professional dog walking community so people can use that Web service, and then we have responsible use of our public lands.

So earlier this year, the Board of Supervisors unanimously passed legislation that I authored too. For the very first time, San Francisco provides some basic regulations and conduct rules for professional dog walkers who use City properties, specifically our parks, but also Utilities Commission and Port property as well.

Previously we had never had any rules, and so as I think you know, there's an enormously high level of dog ownership in San Francisco. And it's important that we give people access to our public lands, but we want to make sure that there's a minimum level of professional requirements.

This had been a desire of San Francisco for almost a decade. And the dog walker associations were the lead proponents. They very much led this legislation to go in place. They are professionals and they understandably want to be seen as professionals. And I think

having some basic rules in place and a permit moves in that direction.

So I got involved last year, and it was a very lengthy, collaborative process with several dog walker associations, with several dog owner groups, with the SPCA, with at the time it was the Neighborhood Parks Council. I did meet with the Presidio Trust at one point as well as with the GGNRA because we do have quite a bit of overlap in terms of dog walker use. And a lot of work for what we'll be able to get done with dogs in San Francisco. It's apparently controversial and challenging, but we were able to get it done and do it unanimously, and I think it was a good result.

So just a few of the basic elements of the legislation – and really those two things that put it into effect are the permit requirement and then also the general rules of conduct.

And the permit requirement applies to any professional dog walker who is walking four or more dogs for pay. So if you have a dog walker seeking one or two, just a couple dogs out, we're not as concerned. It's similar to an owner walking their dogs, so we decided to go with a higher professional [unintelligible] too inclusive and not putting undue burden dog walkers who like to walk one or two dogs at a time. The permit is held only by individuals. We can't have a business that has a bunch of permits and doles them out. Each individual dog walker has to go through the requirements to get the permit. We will be charging a \$250

initial fee and then I believe it's a \$100 annual renewal fee. The dog walker has to carry the permit on his or her person when they're conducting their business on said property.

They have to carry one million dollars in liability insurance and provide proof of that. That's actually the least controversial part of the legislation. Everyone agreed that insurance was important.

They can't have had any animal cruelty convictions for a certain number of years; I think it's in the last ten years if there's a felony and it's a short period if it's a misdemeanor.

They also have to have gone through some level of training, either 20 hours of formal training in specified subjects in the legislation. Or alternatively they can do a 40-hour apprenticeship with another professional dog walker who's been in the business for at least three years.

And also, knowing there are a lot of very experienced dog walkers in the City, we have a grandfathering provision that you have carried a business license in San Francisco conducting a dog walking business for at least three years and could be grandfathered and not go through the training.

Part of the permit requirements, just general rules imposed – one is that once a year they have to provide their clients with information in terms of dog licensing. We have an extremely low dog licensing

rate in San Francisco. It's something like 15 – one, five percent. We're trying to increase that. So we don't want to put the burden on them of ensuring that everyone's licensed. It's sort of an unfair burden, but once a year they have to give a flyer to all of our clients about licensing their dogs.

Dog walkers have to carry one leash per dog on their person at all times even if they're in an off-leash area. They always have to have enough leashes for all the dogs in case they need to leash the dogs. They have to have easy access either on a person or nearby car to water for the dogs, and to specific safety equipment that the director of Animal Care and Control issue regulations specifying what the safety equipment is.

If they are transporting the dogs in a vehicle, federal regulations issued by Animal Care and Control put some basic provisions in place. You can't just dump a bunch of dogs in the back of a station wagon, all sliding around, which would not be safe for the dogs.

And this is sort of repetitive, but they have to clean up after the dog, which of course is already a requirement of my predecessor Harvey Milk's Pooper Scooper law back in the 1970's.

And then the most debated, controversial, prevalent section is the maximum number of dogs. Previously the maximum was 15. It was a maximum. We placed a maximum of eight dogs. This was a hot topic of debate. Generally the debate was between six and

eight, and there are people within the dog walking profession who strongly believe no one should walk more than six. There are others who think that if you're experienced, ten or 12 is perfectly fine. The dog owner groups tended to fewer – six. We went with eight after a lot of discussion and actually a lengthy debate at the board. And my thinking was since this is the first time we're doing this and we're going for a new limit, it's better to be conservative; not go too far. And so we went with eight dogs. Of course, if there's a problem, that could be changed in the future. There are different levels of skill and expertise with dog walkers and they're walking different sized dogs, different aged dogs.

Those are the basics of legislation. The legislation will go into effect on July 1st of next year. It was scheduled to go into effect January 1st, but the director of Animal Care and Control [unintelligible] discretion to delay of six months, which she does exercise. And she's working with dog walker groups to put together some of the regulations and some basic standards. So that's an overview of the provision.

I think it'll be a good thing. The Presidio Trust, the GGNRA will consider having similar rules, and I think when the dog walkers use all of our properties, it will be easier to make [unintelligible].

Nancy Bechtle: Thank you very much, Supervisor Wiener. Before you sit down, are there any other questions from our Board? If the guests could

vote on how many people sitting at this table have dogs or in the room have dogs? I think it's a vast majority, yeah.

Scott Wiener: Yes.

Nancy Bechtle: So I think we're all sympathetic for the extension.

Scott Wiener: So we're not [unintelligible] probably half of the homes. And during [unintelligible] half of the doors had a [unintelligible] dog coming out the side so it's very common.

Nancy Bechtle: Thank you so much.

Scott Wiener: Thank you.

Nancy Bechtle: Karen?

Karen Cook: I want to thank Supervisor Wiener for doing my presentation for me.

[Laughter]

Karen Cook: I wanted to actually start off by just making sure that everyone understood what this rule does not cover first. I think you heard in some detail what it does cover. But this rule was not intended to address the larger question of whether pets in the Presidio, the area administered by the Trust, must be on leash or may be off leash.

As you know, the Golden Gate National Recreation Area is going through a rule making process. We are participating in that as a cooperating agency in the environmental process surrounding our rule making and submitted written comments. The Park Service has told us that it will probably be another year or so before that process is completed. And so we are essentially standing by while that rule making is underway. At the point at which that is completed, we will reassess whether there are further rules that we put in place or just where we go from here.

But this rule was never intended to address a larger issue. The focus of this was knowing that the City was about to implement their rules and put those rules into place. We realized that the Presidio Trust lands being next to these neighborhoods would very likely see an influx of commercial dog walkers looking to avoid paying fees or having to adhere to restrictions that the City was putting into place if we didn't essentially follow along and propose similar rules.

We are not requiring a separate permit. It's not a parallel permitting process. Our rules simply states that if you are a commercial dog walker and you are walking a minimum of four dogs, you must have a City permit, a permit issued by the City of San Francisco. So our rule won't actually take effect until the City begins issuing their permits. But assuming that a commercial dog walker does have a permit issued by the City and is otherwise in compliance

with the regulations that are effective in the Presidio, they would be in compliance with this rule.

Nancy Bechtle: Any questions for Karen?

Craig Middleton: I have one. Karen, could you just remind us what the process is here? This is a public comment opportunity. We're not adopting our rule.

Karen Cook: Right. You're not adopting this rule. We're announcing the rule. It's been published in the Federal Register. We will encourage you to submit public comment tonight and send us written emails. There's information on our Web site. The rules are also posted there. There are mechanisms through our Web site if you need to provide comment. And the comment period will last about 45 days or so, so you don't have to do it tonight.

And following that, we will respond to comments that we received. At that point, we'll assess whether we're going to make any modifications to the rule and then publish the final rule thereafter.

Nancy Bechtle: It's good that it's not actually being implemented in January. I think that it was pretty precipitous; it's a whole lot of reading [unintelligible]. Then it's going to be June? July.

Okay, there are a number of people who I'm feeling would like to make public comment because I'll read the names that I have here.

Nancy Stafford, San Francisco Professional Dog Walkers Association, Sally Stephens, SF DOG. These are both cards. Save your comments till the public comment at the end or you can give your testimony now. It's up to all of you. It's two minutes apiece. State your name for the record.

Sally Stephens: Thank you for the cake by the way. My name is Sally Stephens. I'm with the San Francisco Dog Owners Group, SF DOG. And we have been supportive of professional dog walker legislation and permits for years. We're with Supervisor Wiener on this legislation. And we do think that it's good for you guys to also have similar legislation. It makes sense to use the City permits to do that.

Dog owners, a lot of us – I know I have – we all use professional dog walkers, so it's a very useful and needed service in the City and the areas around the City. And so I applaud you for working at this.

I would encourage you to look at the issues of where you have dogs on leash or off leash, that sort of thing. The 1979 pet policy didn't approve the West Pacific Avenue as being an off-leash area, and two court rulings ruled that that was, in fact, legal for where dogs could be off leash. That was the law of the land and actually still is according to the courts.

The GGNRA's plan, the draft EIR that came out last year [unintelligible] was literally about that thick actually indicates no

real solid, scientific evidence that dogs cause any significant negative impacts on resources, on other visitors and that sort of thing. There are a lot of anecdotal things, but there are actual scientific studies. So I encourage you to look at things from a scientific standpoint, not an anecdotal one and to think about and possibly – I understand not in context of this particular ruling, but in the future, to consider setting up areas where dogs can be walked off leash legally in the Presidio Trust where there's no question or confusion whatsoever. Thank you.

Nancy Bechtle: Thank you.

Nancy Stafford: Good evening. My name is Nancy Stafford. I'm Co-Director of San Francisco Professional Dog Walkers Association also known as PRODOG, and I've been a dog walker for 23 years. PRODOG supports the proposed rule accepting City permits so everyone is on the same page. It makes sense. It will reduce the confusion among our profession as to where the improvements will be needed.

I have to say it's unfortunate though that the Trust chose not to officially participate in the negotiated rule making, or the NEPA process as concerning the GGNRA. That's my understanding. We urge the Trust to use this proposal as an opportunity to work with professional dog walkers and dog owners to establish a dog policy that recognizes the need for off-leash access.

According to the San Francisco SPCA, there are 178,000 dogs in San Francisco. A 2009-2010 survey by a pet food manufacturer states 39 percent of households have dogs. A later survey done in 2011 by Parade Magazine looked at an amount as 43 percent. The majority of dog owners consider their pets as family members. Professional dog walkers have a responsibility to properly take care for the pets entrusted to us, which we take very seriously.

Commercial dog walking has been going on for many years in the Presidio. This proposal will protect the park by giving rules and regulations for dog walkers. I don't believe this will increase the number of professional dog walkers in the park.

There are numerous commercial endeavors in national parks including hunting with dogs. Being a national park in a dense, urban environment requires different uses of the land to accommodate all visitors. And, again, I would echo, Sally, that there's no scientific evidence that dogs have any more of a negative impact than a lot of other types of recreational activities. An appropriate rule can and should be found to accommodate them. Thank you so much.

Nancy Bechtle: Thank you very much.

Amy Meyer: Nancy, do you have any other comments?

Nancy Bechtle: Anybody can speak now about the dog issue, and then we'll take the public comment on everything else at end.

Amy Meyer: All right. This is new and it's wonderful. It's not going to take place until July so there's time to think it through. And the main thing that struck me was that there are many different kinds of areas in the Presidio – some environmentally sensitive, some are trails and some are lawns where people want to picnic. They're not too happy to run into any remains of dogs.

The main thing that I was thinking of was that to more pose this as a question, so I don't expect anybody to quite be able to answer it right now – how would the Trust monitor the use and impact that the dogs create after this gets started and then use that information to make modifications, whatever regulations are, in fact, in place?

And the parks that I'm thinking about most are [unintelligible] and where that would happen. So it's a question, and I think it's something for the next public meeting maybe something people would want to know about. And that meeting might very well take place before this goes into effect in July.

Nancy Bechtle: Thank you, Amy. As usual, good comments and good questions.

Amy Meyer: And something aside entirely from this is thank you so much for acknowledging the park's birthday. It was very sweet and just the whole way you did everything here this evening. When we were

out in Marin County a few weeks ago to celebrate October 27th, one of the things that came up repeatedly was, you know, this is the way it looked 40 years ago. And of course you've made a lot of wonderful improvements on the Presidio. We all have. But the idea that basically what we're looking at in this park in its full length, which is 80,000 acres, that it looks the way it did 40 years ago. It's spiffed up, fixed up, but that's what happened, and that's what we've been celebrating. Thank you.

Nancy Bechtle: Thank you. Okay, are there any more comments on the dog walkers? Yes, please? If you could please introduce yourself. Is it two minutes? It was 30 seconds warning.

Female Voice: One minute and 30 seconds and time's up.

Nancy Bechtle: Thank you.

Matthew Zlatunich: My name is Matthew Zlatunich. I'm a park visitor who has been negatively impacted by commercial dog walkers in the park. And I've been following the issue for a long time and have some information I'm going to leave with you suggesting a second alternative plan. But I did read through the Federal Register plan, and I gleaned some information. There's a lot to say about it. I have lots of comments about this.

All this information is gleaned from the plan in the Federal Register. It states that there's 110,000 dogs or households in the

City that have dogs. We'll assume that they all have one dog. Of that 110,000, one-third employ professional dog walkers. That's 36,000 households that employ professional dog walkers. We'll assume that they employ them one day a week, so 36,000 divided by seven, that means about 5,000 dogs a day are walked professionally.

Of that, we assume that if this plan is implemented that ten percent of them will come to the Presidio being as it's such a prime place to be. That's 500 dogs a day walking in the Presidio. Let's say that half of them are walking in the morning hours and half in the afternoon hours. That's 250 dogs in the morning, 250 in the afternoon. Eight dogs per walker – that equates to about 30 dog walking minutes in the morning, 30 dog walking minutes in the afternoon using roads, occupying parking spaces throughout the Presidio – not a good plan.

Nancy Bechtle: Thank you very much.

Jan Blum: My name is Jan Blum, and I read the dog walking proposal for the Trust, and I have some real key concerns, some of which you've already heard.

Before you start monitoring my time, actually the City plan is now up to nine dogs be walked because the owner can bring his or her own dog with him free of devices [unintelligible], so it's nine potential dogs.

My number one concern is how will the Trust enforce dog roaming policies? Just in my personal experience, there hasn't been great enforcement of only one pet per resident or all dogs on leash policy the Presidio currently has. I haven't seen that very effectively enforced in so long as I've been volunteering on the Presidio, which is about ten years.

Without an appropriate budget for the enforcement and staff to put meaning behind this new method, it seems unrealistic the Trust will be able to control dogs and dog walkers in their own 1,400 acres. What areas and times of day will be made off limit to dog walkers? Please consider this [unintelligible].

Where the Presidio Trust is nearing a City plan, the Trust provides an invitation to the out-of-compliance dog walkers to flood Area A of the national park where rule making won't be completed for another two years. And dog walkers know where they can and can't walk. This will put a financial and staffing burden on NPS and put priceless natural and cultural resources at risk.

Number four – if the Trust is going to allow dog walkers, I would strongly encourage them to go from the three to six level that NPS has consistently set as its target based on established precedence. The enforcement process should be exactly the same as it would be to monitor [unintelligible] in order to regulate the compliance. I think compliance is going to be a very big issue. This park is here

to [unintelligible] allowed dogs than have to downsize to a smaller program later.

And number five is an environmental review of this new policy is now in order. And just real quick, a note about [unintelligible] on us. He might have closed with something like this – the Presidio is a great place strictly for the birds. Let's not let it go to the dogs.

Nancy Bechtle: Thank you very much. Any more comments on dogs? David?

David Anderson: Hi. I'm David Anderson. I live in the Presidio. About two weeks ago, I was off on a trail in the Mountain Lake area and I saw several professional dog walkers there. And it turned out to be [unintelligible] scientifically [unintelligible]. They had eight to 11 dogs each. Half of them were off leash. I was actually pretty shocked and amazed at the number of them. And I was frankly quite turned off by it. What was going to be a nice walk was very unattractive. And clearly there's something that needs to be done with the load of dogs that are in the Presidio and the surrounding areas.

Four to six times a week I walk the Battery to Bluff Trail, which is very, very clearly marked as no pets. In fact, someone drew a little face on the dog and so you can see it even more clearly. But about half the time that I'm on that trail there's either a dog or tracks of dogs, someone with one or dogs. In fact, this afternoon I was on the trail and there are dog tracks. And it wasn't coyotes because there

were foot tracks along with them unless somebody was walking their coyote.

So the problem that has been mentioned about compliance and enforcement is real. The sense of entitlement and the sense of not having to comply with regulations begin to become eroded. So if you're going to take action, you must figure out how you're going to deal with the enforcement at a time when you've got difficult budget issues and manpower shortages. Thank you.

Nancy Bechtle: Thank you very much. Yes?

JoAnn Zlatunich: Good evening. My name is JoAnn, and I'm a neighbor – Richmond District – for over 20 years. And I use the park and I volunteer at this park and really love this park. I want to congratulate Amy because this book that came out and the 40 years that you've been teaching at the GGNRA is awesome. Yet I myself have been impacted negatively by professional dog walking. I am applauding the City for putting this permit process in place. It's a great idea. It's much needed. I walk in the parks. I live here. I just feel that when I see in the GGNRA area commercial things happening and being negatively impacted feels just incongruent with the Trust and what your objectives are here.

I just feel that this option for me to be able to come up and stand to tell you that, thinking about what needs to happen in our area and the wonderful stuff that's been going on with the Conservancy and

the GGNRA, where can we go as citizens where we aren't impacted by packs of dogs? Because we understand dogs are anti-threat. They're an important piece of everybody's lives. And to feel that people who I know who I ask, "Why don't you go to the GGNRA, it's a beautiful area, I volunteer there, it's awesome," and they say, "You know, that's where everybody brings their dogs." And people really are afraid of dogs.

And when you have people having packs of dogs commercially making money and when it's going to take a lot of money to enforce seeing, "Do you have a San Francisco permit," and if people just know that they are not allowed to come to this area with their professional dogs, to come with your own dog is a different experience. You're a park visitor. You're the owner. People making money off of doing this just doesn't feel right to me, so thank you very much for your time.

Nancy Bechtle: Thank you very much. Okay. Oh.

Gary Fergus: My name is Gary Fergus. I'm on the Board of the Crissy Field Dog Group. I commend the Presidio Trust as well as the Supervisor or leader for addressing an important issue. One of the things that I urge you in reviewing the proposed rules is to consider that responsible dog ownership and responsible dog walking by licensed professionals with rules of conduct are set up and aimed at addressing some of the concerns you just heard.

The Crissy Field Dog Group does not support in any way, shape or form irresponsible dog ownership, uncontrolled dogs or professional dog walkers that cannot manage their dogs. But there is an entire community, and the evidence that we submitted as part of the negotiated rule making that you're well aware of is replete with evidence that there can be coexistence; there can be responsible dog ownership and management within the Presidio Trust and as Sally Stephens pointed out this is a recreational use that's gone on in this area in the [unintelligible] Trust for decades.

I commend you for addressing it. I commend you for being consistent with the City of San Francisco. And I echo the comments of the [unintelligible] very much.

## **CORRESPONDENCE**

**PUBLIC AGENCIES  
(NATIONAL PARK SERVICE)**



# United States Department of the Interior

## NATIONAL PARK SERVICE

GOLDEN GATE NATIONAL RECREATION AREA  
FORT MASON, SAN FRANCISCO, CALIFORNIA 94123

IN REPLY REFER TO:

D18 (GOGA-SUPT)

FEB 25 2013

Craig Middleton  
Executive Director  
Presidio Trust  
103 Montgomery Street  
P.O. Box 29052  
San Francisco, CA 94129

Dear Mr. Middleton,

Golden Gate National Recreation Area has reviewed the Presidio Trust's proposed regulation on commercial dog walking in Area B of the Presidio. We understand that the Presidio Trust is taking this action in response to San Francisco's commercial dog walking ordinance, passed last year by the San Francisco Board of Supervisors, which will require a permit for four to eight dogs, liability insurance and training. We share the Trust's concern that without protective action by the Presidio Trust, commercial dog walkers may relocate to Trust lands where commercial dog walking is currently not regulated. This potential redistribution could impact the Presidio Trust's mandate to preserve and protect the park's resources.

However, while we support the Presidio Trust's effort to manage this special use, because we share a boundary with the lands managed by the Presidio Trust, we urge the Trust to adopt a maximum limit of six dogs per dog walker, consistent with the limits specified in the alternatives that permit commercial dog walking in Golden Gate National Recreation Area's draft Dog Management Plan/EIS.

As you know, the park is actively developing a draft Dog Management Plan/EIS (Plan/EIS). That document includes a range of alternatives that address commercial dog walking - from setting a limit of three dogs, to a limit of six dogs with a permit required, to prohibiting commercial dog walking altogether. During development of the draft Plan/EIS, the National Park Service (NPS) carefully considered allowing more than six dogs for commercial and private dog walkers, but dismissed this as a reasonable alternative because it did not comport with two key objectives of the Plan/EIS - visitor experience and safety and resource protection.

In determining a maximum number for the permits, NPS also sought consistency with adjacent jurisdictions, since a consistent number would be easier to understand and to

enforce - two additional draft Plan/EIS objectives. We evaluated the management actions of local and other government entities that have addressed this issue. Two local agencies, Marin County Open Space District and the East Bay Regional Park District, limit numbers to six dogs per dog walker. The majority of agencies surveyed outside the San Francisco Bay Area also limit the number of dogs for commercial walkers to no more than six. These agencies include the City of Boulder Open Space and Mountain Parks, a Colorado agency that pioneered comprehensive dog management planning. The City of San Francisco, with an ordinance allowing up to eight dogs per commercial dog walker in its parks, is an outlier among jurisdictions around the country. Jurisdictions with a primary resource protection and recreation mandate universally settled on six as the maximum number.

We received many public comments on the draft Plan/DEIS 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 walkers, expressed concern that public health and safety would be adversely impacted by allowing more than three dogs per dog walker (commercial or private). Some noted 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. A number of commenters requested that commercial dog walking not be allowed at all.

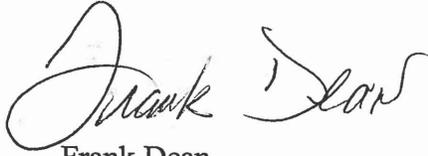
We are very concerned that dog walkers could not consistently control more than six dogs under voice and sight control, particularly in an NPS area where there is a primary mandate of resource protection and a secondary mandate of visitor (not commercial) experience. Based on public comment, feedback from the discussions of the park's previous Negotiated Rulemaking Committee for Dog Management, park staff observations and research, and law enforcement experience, we believe that allowing more than three dogs without a permit system, or more than six dogs total under a permit system could impact visitor experience and safety, and would not meet the purpose of and need for the Plan/EIS

Along with Presidio Trust, we are similarly concerned about the possible effects of the city's action on park lands, users and resources. Given that the park's Dog Management Plan, final EIS, and final rule, are not expected to be completed until 2015, the combined actions of the City and the Trust, should it adopt the city's regulation, will likely cause a redistribution of commercial dog walkers to NPS lands. As a result, the park is now considering enacting an interim commercial dog walking permit system that would be in place only until the Dog Management Plan/EIS is finalized, and a final rule promulgated. The interim permit would include a limit of six dogs per dog walker, based on information gained in development of the draft Plan/EIS.

In summary, Golden Gate National Recreation Area supports the Presidio Trust's effort to manage this special use, but urges adoption of a lower initial permit limit in their proposed regulation, given the Presidio's presence within the boundaries of a national park unit. We would further encourage the Trust to consider adopting the park's interim permit system, should it be implemented, on either an interim basis or as part of the Trust's final rule.

A combined Presidio Trust and NPS approach to commercial dog walking would provide consistency on federal park lands managed by sister agencies, and equally important, be more likely to fulfill our joint resource protection and visitor experience mandates.

Sincerely,

A handwritten signature in black ink that reads "Frank Dean". The signature is written in a cursive, flowing style.

Frank Dean  
General Superintendent

## **CONSERVATION ORGANIZATIONS**



*inspiring people to protect  
Bay Area birds since 1917*

February 25, 2013

Via US Mail and Email

John Pelka, The Presidio Trust,  
103 Montgomery Street,  
P.O. Box 29052  
San Francisco, CA 94129.

RE: Proposed *Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions*

Dear Mr. Pelka:

I am writing on behalf of the Golden Gate Audubon Society (GGAS) regarding the proposed *Public Use Limit on Commercial Dog Walking* regulation for the Presidio. As a community organization with a specific interest in the preservation of birds and other wildlife and their habitats, GGAS has a long history of working to preserve the Presidio's resources and upholding National Park values. We are greatly concerned because the proposed rule fails to do either.

As an initial matter, GGAS strongly urge the Presidio Trust (Trust) to refrain from issuing a final rule until after the National Park Service has completed its Dog Management Plan and Environmental Impact Statement (EIS) for the Golden Gate National Recreation Area. As you know, the GGNRA Dog Management Plan has been years in the making and has undergone environmental review. A final decision is pending. Any decision that the Trust reaches that deviates from the final Dog Management Plan will only engender confusion, controversy and, likely, litigation. While GGAS is dissatisfied with the status quo in the Presidio and the whole, we would refer that dog management rules follow an orderly and common-sense process.

That said, the proper action for the Trust to take at this time is to publicly acknowledge that commercial dog walking in the Presidio is illegal. The Trust should prohibit it and enforce that prohibition until (1) the GGNRA Dog Management Plan is complete and (2) the Trust has prepared and implemented its own rules (parallel to the Dog Management Plan) with adequate notice to and input from the public.

The comments below are provided under the assumption that the Trust will proceed with the proposed regulation despite that the Dog Management Plan is not yet complete. Should the Trust persist in issuing this rule, we urge you to thoroughly review these and others' comments,

**GOLDEN GATE AUDUBON SOCIETY**  
2530 San Pablo Avenue, Suite G Berkeley, California 94702  
*phone* 510.843.2222 *fax* 510.843.5351 *web* www.goldengateaudubon.org

conduct adequate environmental review, and always put the protection of the Presidio—its historical and natural resources—before all other considerations.

**I. THE PRESIDIO IS A MULTI-USE AREA THAT MUST BE WISELY MANAGED TO AVOID UNDUE IMPACTS OR EXPLOITATION BY ANY SINGLE USER GROUP.**

GGAS understands that the Presidio serves a broad community of users and residents in San Francisco, including many dog owners. We understand that there are significant pressures within San Francisco to accommodate private and commercial dog walkers. We also understand that the Presidio Trust and the National Park Service have particular stewardship obligations to meet in the protection and preservation of the lands under their jurisdiction.

We wish to be clear that these comments relate primarily to *commercial dog-walking*, which is not an activity that provides for the enjoyment of our National Park lands by park visitors, but rather a commercial enterprise that places burdens on the public land and reduces the use and enjoyment of the park by other park users. (See Attachment A)

**A. Commercial Dog Walking Has Significant Environmental Impacts on the Presidio.**

The Presidio Trust (Trust) acknowledges that, during any given time of day, there are 10-20 commercial dog walkers walking dogs within Area B. (See Project Screening Form) The Trust further acknowledges that dogs brought into the Presidio in these numbers have been responsible for damage to resources, threats to public safety, and visitor conflict, and that there is a need to address this problem. (See 77 Fed. Reg. 225: 69786) The Trust's finding is consistent with the National Park Service's findings that dogs damage natural resource and diminish the use and enjoyment of park lands by some park visitors.<sup>1, 2</sup> (See, e.g., National Park Service, *Draft Dog Management Plan/Environmental Impact Statement* ("DEIS"), at 12-20)

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<sup>1</sup> These findings are also supported by a significant number of scientific studies. (See, e.g., Lafferty .D. 2001. *Disturbance to wintering western snowy plovers*. Biological Conservation. 101: 315-325 (finding that dogs were a “disproportionate source of disturbance” for snowy plovers); Lenth, B. et al. 2006. *The Effects on Dogs on Wildlife Communities*. 2006. Research Report Submitted to City of Boulder Open Space and Mountain Parks, available at [http://www.friendsofboulderopenspace.org/documents/dogs\\_wildlife\\_communities.pdf](http://www.friendsofboulderopenspace.org/documents/dogs_wildlife_communities.pdf) (“The presence of dogs along recreational trails correlated with altered patterns of habitat utilization by several wildlife species.”); Banks, P.B. and J.V. Bryant. 2007. *Four-legged friend or foe? Dog walking displaces native birds from natural places*. Biol. Lett. (2007) 3, 611–613, available at <http://rsbl.royalsocietypublishing.org/content/3/6/611.full.pdf> (finding that dog walking resulted in a 41% reduction in the number of birds detected and a 35% reduction in species richness)) The Trust has the burden of demonstrating why permitting commercial dog walking will not further degrade Trust resources and how, if at all, commercial dog walking contributes to the Presidio.

<sup>2</sup> The Trust must acknowledge that (1) dogs do attack and harass park visitors on a regular basis and (2) that some park users are justifiably concerned about unwanted interactions with dogs. Many parents of small children, community members with disabilities, and the elderly are all groups that are justifiably concerned about unwanted interactions with dogs.

Park users have legitimate concerns about their safety around dogs, especially off-leash dogs. According to the U.S. Center for Disease Control (CDC), approximately 4.5 million people are bitten by dogs each year, with

Under this proposal it is estimated, based on figures provided by the Trust, that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon. (See Attachment B) Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking lots, and walkers with up to eight dogs each will be ever-present on public trails and open spaces.

The proposal will add immense burdens to Park operations. The need for additional administration, oversight, enforcement, resource maintenance, and public relations will increase—along with the concomitant costs—while the Trust will not be generating any additional revenue to cover these expenses. Moreover, there will be a reduction in non-commercial park visitors and volunteers. In short, the Trust and National Park Service will have to absorb the costs associated with accommodating private business people who are making a profit from the use of Trust lands and resources without generating any revenue for the Trust.

**B. The Trust Should Not Issue a Rule that Contradicts or Violates Existing Regulations, which Already Prohibit Commercial Dog Walking in the Presidio.**

The text of the supplementary information states: “The Trust currently does not impose restrictions specific to Commercial Dog Walkers in Area B.” However, federal regulations already cover business operations on Park Land, several of which are applicable to Commercial Dog Walkers in Area B, including:

**36 CFR 1005.3 Business operations.** Engaging in or soliciting any business in the area administered by the Presidio Trust, except in accordance with the provisions of a permit, contract, or other written agreement with the United States, is prohibited.

**36 CFR 1005.6 Commercial vehicles.** (a) The term "Commercial vehicle" as used in this section shall include, but not be limited to trucks, station wagons, pickups, passenger cars or other vehicles when used in transporting movable property for a fee or profit, either as a direct charge to another person, or otherwise, or used as an incident to providing services to another person, or used in connection with any business. (b) The use of government roads within the area administered by the Presidio Trust by commercial vehicles, when such use is in no way connected with the operation of the area administered by the Presidio Trust, is prohibited, except that in emergencies the Executive Director may grant permission to use Presidio Trust roads.

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approximately one-fifth of those (or 885,000) requiring medical attention for dog-related injuries. (See <http://www.cdc.gov/HomeandRecreationalSafety/Dog-Bites/biteprevention.html>) In 2006, more than 31,000 people underwent reconstructive surgery as the result of being bitten by dogs. By permitting a commercial activity that poses a threat to other park visitors, the Trust is inviting a nuisance into the park while failing to demonstrate any way in which the activity furthers Park values. According to the National Park Service, a significant number of potential park visitors are afraid of dogs and report being less likely to visit the park due to fear about negative interactions with dogs. (See DEIS, at 19-20)

**36 CFR 1005.13 Nuisances.** The creation or maintenance of a nuisance upon the federally owned lands of the area administered by the Presidio Trust or upon any private lands within the boundaries of the area administered by the Presidio Trust under the exclusive legislative jurisdiction of the United States is prohibited.

These regulations clearly pertain to, and are applicable to commercial dog walking businesses. If adequate compliance with these regulations is achieved the adverse impacts of commercial dog walking would be eliminated.

**1. Commercial dog walking activity does not meet the criteria for permit issuance under the conditions of the proposed action.**

Federal law states that the activity authorized by a federal permit shall be consistent with applicable legislation, regulations and administrative policies, and based upon a determination that public health and safety, environmental or scenic values, natural or cultural resources, or the avoidance of conflict among visitor use activities *will not be adversely impacted*. (See 36 CFR 1001.6) Since commercial dog walking will adversely impact public safety, environmental and scenic values, natural and cultural resources, and the avoidance of conflict among visitor use activities, it therefore does not qualify as a permissible activity.

The proposed action does not assume a reduction in the amount of commercial dog walking from the volume that is currently, albeit illicitly, occurring in Area B of the Presidio. Rather, the proposed action portends to limit a hypothetically supposed increase in commercial dog walking that will result from the imminent implementation of a City of San Francisco ordinance. We note that in reality, the proposed action is nothing more than the abdication of the Trust's responsibilities; it is letting itself be guided by the City and County of San Francisco's permit system, which lacks any environmental review or any scientific support at all.

If the proposed action is adopted and implemented, the volume of commercial dog walking in Area B would likely remain consistent with the current rates and, over the long term, potentially increase in volume. The National Park Service's DEIS anticipates an increase in dog walking in the park over time; it is reasonable to assume the same pressures will be applied on Area B. Therefore, it is not reasonable to expect that conflicts, threats to public safety, or other impacts will be reduced by the implementation of the proposed action.

**2. Permitting commercial dog walking violates the Presidio Trust Act and the Presidio Trust Management Plan.**

The Presidio Trust Act Sec. 101 specifies that the Presidio's significant natural, historic, scenic, cultural, and recreational resources *must be managed in a manner which is consistent with sound principles of land use planning and management*. The proposed action fails to follow any "sound principles" and, instead, is the abdication of the Trust's responsibility to manage its resources to a political decision made by the City and County of San Francisco.

One source of sound principles of land use planning and management available to the Trust are the National Park Service Management Policies 2006. These policies are certainly applicable to the GGNRA and should be reasonably applicable to Area B of the Presidio too. The

policies of the NPS MP 2006 clearly do not allow for commercial dog walking activities as provided for in the proposed action. (*See* NPS MP2006 8.1.1, 8.1.2, 10.3.1, 10.3.2, 10.3.3)

An additional source of sound principles of land use planning and management available to the Trust is the Presidio Trust Management Plan (PTMP). Commercial dog walking is clearly contrary to the letter and spirit of the PTMP. The PTMP includes the following statements:

- “The Presidio will remain an open space haven with its natural, historic, scenic, cultural, and recreational resources preserved for public use and enjoyment.” (PTMP, pg. xii)
- “Open space and natural habitats will be preserved, enhanced, and increased.” (PTMP, pg. xii)
- “The historic forest will be rehabilitated, wetlands enhanced, and native plant and wildlife species protected.” (PTMP, pg. xii)
- “Public uses will invite and engage visitors to the park...” (PTMP, pg. xii)
- “The Presidio Trust will discourage automobile use...” (PTMP, pg. xii)
- “Habitat for rare and unique plant and wildlife species will be protected and enhanced.” (PTMP, pg. ix)
- “Open space and forested areas will be preserved to provide wildlife habitat and a refuge for visitors.” (PTMP, pg. ix)
- “...to restore open space and natural systems, and to improve the quality of the visitor experience.” (PTMP, pg. ix)
- “...a setting for contemplation, education, research, and recreation.” (PTMP, pg. ix)

The PTMP does not contemplate using the Presidio’s trails, open spaces, roadways and parking areas for commercial purposes. On the contrary, as indicated by the citations above, the PTMP is squarely aimed at preserving the natural and historic resources of the Presidio and protecting the park experience for future users.

**3. The Trust Executive Director is the only legal authority qualified to issue a commercial use permit for Area B of the Presidio.**

Federal law provides that the Presidio Trust Executive Director may issue a permit to authorize an otherwise prohibited activity within Area B of the Presidio. This section of the federal regulations does not provide for any other authority to issue permits for otherwise prohibited activities. (*See* 36 CFR 1001.6) Therefore, it is not clear whether this rule-making process is at all legal.

**C. The Proposed Action Does Not Fall Under Any Categorical Exclusion from Environmental Review.**

The Trust has not fully considered the impacts of commercial dog walking, has not taken adequate input from the public, and puts forth only one alternative for consideration. Given the potentially significant adverse impacts from the permitting of commercial dog walking, GGAS believes that this proposal represents a significant change and does not meet the criteria for categorical exclusion from environmental review. Commercial dog walking, as provided for in the proposed action (10-20+ professional dog walkers, with up to eight dogs each, at any given time of day) would significantly alter the kind and amount of natural, recreational, historical, scenic, or cultural resources of the Presidio Trust Area or the integrity of the setting. (See 36 CFR 1010.8 (c) (3)) Additionally, the proposed action would introduce a non-compatible use that might compromise the nature and characteristics of the area or cause significant physical damage to it. (See 36 CFR 1010.7 (10) (ii) (B))

Without adequate compliance efforts, the adoption of this proposal and the permitting of commercial dog walking within Area B of the Presidio will open the Trust to the possibility of a legal challenge on the issue.

**D. The Proposed Action Does Not Fully Consider the Costs of Permitting Commercial Dog Walking.**

Any proposal to permit commercial dog walking within Area B of the Presidio must assume, as a baseline condition, that all regulations are being enforced and adhered to by the public. This proposal assumes that 10-20 commercial dog walkers operating within Area B at any given time of day, an activity that is not in compliance with Federal regulations, is the baseline from which action will be taken and costs will be calculated. A proper comparison should be made weighing the costs and impacts of this proposal against the costs and impacts of a “no commercial dog walking” alternative in which only recreational dog walkers, limited to a specified maximum of dogs per walker, are permitted within Area B.

**E. All Dog Walkers Should Be Equally Limited.**

All dog walkers within Area B of the Presidio should be equally limited to a number of dogs that can be reasonably managed in a manner which is consistent with all federal regulations, consistent with sound principles of land use planning and management, and in keeping with the vision and objectives as set forth in the Presidio Trust Management Plan. A single, clear rule that can be widely broadcast to dog walkers in the area will allow for more efficient administration, greater compliance, and reduced impacts to Trust resources.

## **II. RECOMMENDATIONS**

GGAS has the following recommendations as a means of reducing damage to resources, threats to public safety, and visitor conflict due to the large volumes of dogs in Area B:

1. The Trust should take appropriate measures to gain compliance from the general public and the CDW industry with all federal regulations that apply to Area B. These measures can include outreach, education, and enforcement.
2. Limit recreational dog walkers to a maximum of two dogs each. More than two large dogs can be difficult for one person to adequately control.
3. Closely monitor the impacts of recreational dog walking within the park and impose further limits if necessary.
4. Continue to promote and nurture a culture of stewardship based on National Park values.

## **II. CONCLUSION**

Visitors come to the Presidio to enjoy its superlative natural and cultural resources in a tranquil setting. Volunteers come to the Presidio to connect with and gain a deeper understanding of the natural and cultural history. These qualities will be diminished by permitting commercial dog walking to continue and expand in the Presidio.

GGAS opposes the permitting of commercial dog walking within the Presidio because it diminishes these values and because it is not an appropriate use of National Park lands. Commercial dog walking is not compliant with federal regulations, is not compatible with preserving park resources or the park visitor experience, and constitutes a commercial exploitation of park lands that has significant environmental and social consequences.

If it is going to continue to allow dog walking in Area B, the Trust should put forth documentation that supports findings about (1) the legality of the decision, (2) the number of dogs that one person can reasonably keep under control, (3) compliance with leash requirements, (4) consequences of non-compliance with proposed rules, including environmental damage and public safety, (5) costs associated with enforcement, compliance, and non-compliance, (6) impacts to park visitors and resources, and (7) impacts to adjacent resources.

As stated at the beginning of this letter, GGAS urges the Trust to refrain from issuing its rule until the NPS' Dog Management Rule process is complete for the GGNRA. If the Trust adopts this proposal and permits commercial dog walking in Area B of the Presidio, it is opening itself to the possibility of a legal challenge on the issue.

Thank you for considering our comments on this matter. If you would like to discuss them further, please do not hesitate to contact me at (510) 843-9912 or [mlynes@goldengateaudubon.org](mailto:mlynes@goldengateaudubon.org).

Respectfully submitted,

A handwritten signature in cursive script that reads "Michael Lynes". The signature is written in dark ink on a light-colored, slightly textured background.

Michael Lynes  
Executive Director

## ATTACHMENT A

### Potential Adverse Impacts of Commercial Dog Walking in Area B

#### Damage to resources

- Soundscape – hundreds of dogs will produce significant amounts of related sounds.
- Viewscape – natural views will be blighted by walkers with eight dogs each.
- Odor – odors produced by dogs could cause wild animals to modify their behaviors, such as mating, migration, feeding, predator avoidance, prey selection, and the establishment of social structures. (NPS MP 2006, 4.11)
- Wildlife – the presence of dozens-hundreds of dogs will displace wild animals.
- Parking – visitor parking spaces will be occupied by commercial vehicles.
- Traffic – commercial vehicles will be ubiquitous on park roadways.
- CO<sub>2</sub> – emissions from commercial vehicles will diminish the air quality.
- Urine – urine from hundreds of dogs will adversely impact the soil and groundwater.
- Damage to plants – hundreds of dogs in open spaces will affect the growth potential of native plants.
- Damage to soil – hundreds of dogs on trails and in open spaces will affect soil stability.
- Tranquility – walkers with groups of eight dogs each on trails and open spaces will diminish the tranquility of the park.

#### Threats to public safety

- Blocking trails – groups of eight dogs on trails will be disruptive to through hikers.
- Trip hazard – groups of eight dogs on trails will pose trip hazards to through hikers.
- Bites – hundreds of dogs in the park will vastly increase the potential for dog bites to park visitors.
- Disease – hundreds of dogs in the park will vastly increase the potential to transmit disease through fecal and body fluid exposures.

#### Visitor conflict

- Displacement from trails and open spaces – some park visitors will be repelled from trails and open spaces due to the adverse impacts of dogs.
- Parking – visitors will compete for parking spaces with commercial dog walking vehicles.
- Tranquility – park trails and open spaces will have a diminished quality of tranquility.
- Contemplative setting – contemplative settings will be compromised by the volumes of dogs and their impacts.

#### Other

- Additional operating expenses – additional costs will be incurred by the park for administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers.
- Carbon footprint – the carbon footprint of the park will be impacted by the many commercial vehicles entering the park on a daily basis.

- Precedent – permitting commercial dog walking may set a precedent for other National Park units.
- Loss of visitors – some visitors may avoid the park because of the large volume of dogs.
- Loss of stewardship volunteers – some volunteers may be discouraged by the adverse impacts of commercial dog walking and lose interest in park stewardship.

## ATTACHMENT B

### Projected Volume of Commercial Dog Walking in the Presidio

The Federal Register announcement states that 110,000 households in San Francisco have dogs. Of these, one third employ commercial dog walkers. (*See* Federal Register, pg. 69786) Below is a calculation to estimate how many commercial dog walkers will conduct their business in the Presidio if this plan is adopted.

- San Francisco has approximately 110,000 households with dogs, which if divided by three equals approximately 35,000 households that employ commercial dog walkers.
- Assuming all of these households have only one dog that is professionally walked once a week; 35,000 dogs divided by 7 days equals 5,000 dogs professionally walked per day.
- Assuming that only 10% of those dogs are walked within the Presidio, that would be 500 dogs per day professionally walked in the Presidio.
- Assuming that half of the dogs would be walked in the morning hours and half of the dogs would be walked in the afternoon hours, that would be 250 dogs in the morning and 250 dogs in the afternoon.
- Assuming that each dog walker is walking 8 dogs; 250 dogs divided by 8 dogs per walker equals about 30 dog walkers.
- If commercial dog walking is permitted in the Presidio it can conservatively be expected that 30 commercial vehicles will be driving into the Presidio, occupying parking spaces and walking up to 8 dogs each on the trails and open spaces every morning and every afternoon.

## National Parks Conservation Association

February 25, 2013

John Pelka  
Presidio Trust  
103 Montgomery Street  
San Francisco, CA 94129  
Sent via email to [jpelka@presidiotrust.gov](mailto:jpelka@presidiotrust.gov)

### **Re: opposition to proposed Public Use Limit on Commercial Dog Walking**

Dear Mr. Pelka,

The following are comments by the National Parks Conservation Association (NPCA) on the proposed Public Use Limit on Commercial Dog Walking plan/rule. NPCA is dedicated to the protection and enhancement of national parks for current and future generations. We advocate on behalf of our more than 750,000 members and activists, and our membership values the Presidio national park. As described below, NPCA writes in opposition to the proposed commercial dog walking (CDW) plan.

First, we acknowledge that the Presidio Trust (Trust) is reacting to the City of San Francisco's CDW plan and the Trust believes that it needs to take action to protect the Presidio's resources and visitor experience. Though we strongly disagree with the approach and substance of the proposed rule put forward by the Trust, we respect and appreciate the intent behind the actions the Trust has taken.

As a threshold matter, CDW is a commercial use of national parks that is currently not authorized by applicable law and policy at the Presidio. The CDW plan proposes to bypass the "authorization" of such a use and simply move forward to "managing" or "limiting" the use. The Trust cannot limit a use that does not have the underlying compliance or authorization. The lack of authorization is manifest in the Trust's federal register notice on the proposed rule, which does not describe the authorization for this use and also states "The Trust currently does not impose restrictions specific to Commercial Dog Walkers in Area B." Should the Trust wish to manage this use, it should first determine whether this commercial use of national park land and resources is consistent with governing purposes, laws, and policies of the park.

For this use to be adopted in the Presidio, the Trust must make a determination that engages the public in considering topics such as alternatives, recreational uses, resources and their associated protection, and impacts to park operations. The Trust acknowledges that CDW is an activity that is extremely controversial and degrades park resources. The federal register notice states "By both direct observation and through reports from the public, the Trust is aware that dogs brought into the Presidio in these numbers [four or more dogs]<sup>1</sup> have been responsible for damage to resources, threats to public

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<sup>1</sup> It is puzzling that the Trust acknowledges that CDW at levels of four or more dogs is resulting in "damage to resources, threats to public safety, and visitor conflict", yet the Trust's proposed rule rubber stamps that exact number of dogs and thus rubber stamps the continued problems rather than addressing them (notwithstanding the threshold matter that this commercial use is not authorized).

safety, and visitor conflict.” Under federal guidelines, authorizing and managing such a use first requires NEPA analysis, specifically the preparation of an Environmental Impact Statement (EIS). Given these considerations and the Trust’s own acknowledgement that CDW is controversial and impacting resources and visitors, we believe that the process for authorizing this commercial activity does not meet the criteria for a NEPA categorical exclusion. We feel compelled to point out that attempting to manage for the increase in negative impacts associated with presumed increased CDW<sup>2</sup> in the Presidio, rather than taking a hard look at whether such a use is even appropriate and necessary, undermines the Presidio’s own standards for determining acceptable use. The erosion of these standards tarnish the Presidio’s status as a national park that is to be managed for all Americans, and instead allows the public to view this place as no different than a City of San Francisco property where local considerations (pet ownership and management) is on par with public access, visitor safety, and wildlife protection.

We believe that the Trust cannot rely on “the substantial amount of feedback from diverse constituencies that went into drafting and refining the City’s ordinance.” for compliance, as stated in the federal register notice. The detail that describes the “diverse constituencies” is not stated by the Trust, and more importantly, the feedback solicited by the City has no relevance to the Presidio as a physical location and importantly, to the Presidio’s governing laws, policies, management goals, and values. It is inappropriate for the Trust to rely on the City’s feedback that was collected under a wholly different regulatory and policy context (i.e. City “standards”) as a substitute for their own compliance under federal national park standards.

The Presidio should work in partnership with its adjacent federal and national park partner, the Golden Gate National Recreation Area (GGNRA). By legislation, the Presidio is a part of the GGNRA. The laws, policies, and management goals for the Presidio are significantly more aligned with the GGNRA than the City, and the GGNRA compliance could and should be adopted by the Trust.

Regarding process, we are disappointed that the Trust has apparently excluded long-standing interest groups, such as those concerned with natural resource protection, visitor enjoyment, public access, public safety, and varied recreation. As seen in the Project Screening Form, the pre-scoping process was not informed by a robust set of views by NGOs, and instead confined to only one interest group: commercial dog walkers. In fact, the Trust consulted with three CDW groups as well as an elected official (Supervisor Scott Weiner), who is chief advocate for CDW policy on City owned lands.

**Recommendations:**

- Any rule should comply with NEPA analysis via an EIS that considers the authorization of CDW, or should comply with interim rules established in connection with NEPA EIS analysis. The Trust should conduct this NEPA process themselves or rely on the GGNRA’s ongoing NEPA process.

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<sup>2</sup> The federal register notice states that “This increase in dogs [Trust’s assumed increase in CDW in the Presidio as a result of the City’s July 1 CDW regulation implementation] in Area B will inevitably affect the use and enjoyment of the Presidio by other users, will increase damages to resources, and will increase the cost of park maintenance and operations.”

- The Trust should not align with a City agency, but rather with the GGNRA, its federal partner. The Presidio is within the boundaries of the GGNRA, adjoins lands managed by the GGNRA, and has legislation and policies most similar to the GGNRA. On a practical note, and assuming CDW was an authorized commercial use, it is our belief that if the Trust expects to change its rules from those the City has developed to those the GGNRA has developed (as the Trust suggests it may) it will become a difficult public relations matter and could likely confuse the public.
- Do not issue a rule that is informed by or considers the policy-making of the City of San Francisco. The City has not factored in, and will not due to its limited jurisdiction, the laws, policies, management goals, and values associated with the Presidio – a national, not city, park.
- Develop equity in consultation with varied interest groups and do not only seek feedback from CDW interests, as seen in the Project Screening Form.

Thank you for your consideration of our comments. Please do not hesitate to contact me to discuss this matter.

Sincerely,

A handwritten signature in cursive script that reads "Neal Desai".

Neal Desai  
Pacific Region Associate Director  
National Parks Conservation Association  
415-989-9925  
[Ndesai@npca.org](mailto:Ndesai@npca.org)

# Presidio Environmental Council

Dune Ecological Restoration Team ◇ Golden Gate Audubon Society  
San Francisco League of Conservation Voters ◇ Sierra Club  
Urban Watershed Project ◇ Wild Equity Institute

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February 25, 2013

Mr. John Pelka, Presidio Trust  
103 Montgomery Street  
Post Office Box 29052  
San Francisco, CA 94129

**Re: Proposed *Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions*  
(36 CFR 1002)**

Dear Mr. Pelka:

The Presidio Environmental Council (PEC) is pleased to offer our comments on the above referenced proposal. The PEC strongly opposes the Presidio Trust's (Trust) proposal that would allow commercial dog walking (CDW) businesses to operate within Area B of the Presidio.

Under this proposal, it is estimated that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon (*See Attachment A*). Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking areas, and walkers with eight dogs each will ply the public trails and open spaces.

We understand that commercial dog walking takes place currently in some areas of the Presidio, and that some Trust staff members fear that the number of dogs walked will increase if the "Public Use Limit" is **not** approved and implemented. It is important to understand that while referred to as a "limit" the proposal would actually institutionalize a use that is not compliant with park policies and should not be allowed. In assessing the environmental impacts of the proposed project, the baseline used should be the conditions that would prevail now if CDW were not allowed and if the prohibition on CWD were duly enforced.

Use of the Presidio by the commercial dog walking industry constitutes an exploitation of park lands for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience.

Given the scope of its responsibility for the resources and values entrusted to its care, the Trust has an obligation to demonstrate and work with others to promote leadership in environmental stewardship. The Trust must set an example not only for visitors, other governmental agencies, the private sector, and the public at large, but also for a worldwide audience. In demonstrating environmental leadership the Trust must fully comply with the letter and spirit of the Presidio Trust Act and all Federal regulations and administrative policies.

Presidio Environmental Council  
Steven Krefting, Convener  
45 Montcalm St., San Francisco, CA 94110-5357

The PEC offers the following points for consideration:

### **1. Commercial dog walking (CDW) is not an appropriate use of the Presidio.**

- CDW is not consistent with sound principles of land use planning and management (Presidio Trust Act Sec. 101 (5)) (PTMP).
- CDW provides no services to park visitors, has more than a minimal impact on resources and values, and constitutes more than an incidental use of resources, and therefore does not qualify for commercial use authorization (16 USC 5966).
- CDW adversely impacts park resources and values (36 CFR 1001.6) (16 USC 5966) (Attachment B).
- CDW may impair park resources and values (NPS MP 2006 1.4.5).
- CDW has unacceptable impacts on park resources and values (NPS MP 2006 1.4.7.1) (Attachment B).
- CDW is not an appropriate use of the park (NPS MP 2006 1.5) (NPS MP 2006 8.1).
- CDW does not require a national park setting and is more appropriate to other venues (NPS MP 2006 8.2).

The City of San Francisco's CDW ordinance is not compatible with Federal rules and regulations that apply to lands under NPS jurisdiction. Federal law requires that, "any activity authorized by a permit shall be consistent with applicable legislation, Federal regulations and administrative policies, and based upon a determination that public health and safety, environmental or scenic values, natural or cultural resources, scientific research, implementation of management responsibilities, proper allocation and use of facilities, or the avoidance of conflict among visitor use activities will not be adversely impacted" (See 36 CFR 1001.6). Being that CDW is responsible for damage to resources, threats to public safety, and visitor conflict, (See Federal Register Vol. 77, No. 225, pg. 69786) it is a source of adverse impact and therefore does not qualify as a permissible use.

The notion of CDW is not consistent with the land use policies as specified in the Presidio Trust Management Plan (PTMP). The PTMP does not contemplate using the Presidio's trails, open spaces, roadways and parking areas for commercial purposes. On the contrary the PTMP is squarely aimed at preserving the natural and historic resources of the Presidio and protecting the park experience for current and future users.

Use of Area B by the CDW industry will certainly lead to increases in costs related to resource protection, public safety, and conflict avoidance. These costs will result in either an increase in the total cost of park operations or in a decrease in the funding available for other park needs.

Since CDW, as specified under the proposed action, is not consistent with the laws and policies applicable to Area B, is not consistent with existing plans for public use and resource management, will have actual and potential effects on park resources and values, will place a financial burden on the Trust, and will not serve the public interest, it does not qualify as an appropriate use of Presidio lands.

### **2. The NEPA review of the proposed action is inadequate.**

Given the scope of potentially adverse impacts from CDW in Area B, the proposed action represents a significant change and does not meet the criteria for categorical exclusion from environmental review. The Trust has not fully considered the impacts of CDW, has not taken adequate input from the public,

has not consulted an adequate cross section of stakeholders, and puts forth only one alternative for consideration (See Project Screening Form). Commercial dog walking, as provided for in the proposed action (10-20+ professional dog walkers, with up to eight dogs each, at any given time of day) would “significantly alter the kind and amount of natural, recreational, historical, scenic, or cultural resources of the Presidio Trust Area or the integrity of the setting” (See 36 CFR 1010.8 (c) (3)). Additionally, the proposed action would, “introduce a non-compatible use that might compromise the nature and characteristics of the area or cause significant physical damage to it” (See 36 CFR 1010.7 (10) (ii) (B)).

### **3. Adoption of the proposed action constitutes a condoning of CDW in Area B.**

It is clear that the proposed action does not establish a Trust-managed CDW permitting process, but rather proposes to accept the conditions of a City of San Francisco ordinance. Yet, adoption of the proposed action would imply that the Trust condones CDW within Area B. By embracing the City ordinance, the Trust would be enabling the very problem that is causing damage to resources, threats to public safety, and visitor conflict, and indicating to the public that these conditions are acceptable.

If adopted, the proposed action will likely undermine efforts to nurture a culture of resource stewardship. Adoption of the proposed action would send a clear message that the CDW industry is welcome within Area B attracting City permitted (and likely unpermitted) professionals into the park.

### **4. It is the position of the PEC that the Trust should not adopt the proposed action. As an alternative to the proposed action the PEC recommends the following actions:**

a) Postpone any and all decision making regarding adopting the City of San Francisco’s CDW policies until such time as the National Park Service (NPS) publishes their own policies and requirements on CDW.

To pre-empt the Park Service and possibly introduce a conflicting management policy in Area B versus Area A of the Presidio is not prudent and could leave the Trust or NPS open to new litigation. Potentially conflicting policies between the two management entities should be assiduously avoided to prevent confusion and conflict in the mind of the public who see the Presidio as “one place”. Postponement also saves the Trust the very difficult public relations task of the probable need of backtracking and redefining its CDW management program, an extremely emotional and highly controversial issue, once the Park Service has completed its very thorough process.

b) Encourage engagement and education of the general public regarding the non-compatibility of CDW with the objectives and values of the Presidio. A proactive public education campaign could be effective at informing visitors of the park rules and regulations and why they are needed.

c) Facilitate a level of law enforcement necessary to adequately gain and maintain a reasonable level of compliance with all park regulations applicable to both Area A and to Area B.

**5. The PEC supports the revised disposal conditions.**

Regulations that require the removal and appropriate disposal of dog waste should be adopted and implemented as soon as possible. There is no need to delay the creation of such rules pending the lengthier process that should apply to any proposal on CDW that we know would have negative impacts on the environmental and historic resources of the Presidio.

Thank you for the opportunity to submit these comments on the proposed action. Please do not hesitate to contact us with any questions regarding these comments.

Sincerely,



Steven Krefting, Convenor  
Presidio Environmental Council

Sharon Tsiu  
Dune Ecological Restoration Team

Mike Lynes  
Golden Gate Audubon Society

Amandeep Jawa  
San Francisco League of Conservation Voters

Rebecca Evans  
Sierra Club

Doug Kern  
Urban Watershed Project

Brent Plater  
Wild Equity Institute

Jan Blum  
Member, PEC

Ruth Gravanis  
Member, PEC

Mary Anne Miller  
Member, PEC

Matt Zlatunich  
Member, PEC

## Attachment A

### Projected Volume of Commercial Dog Walking in the Presidio

The Federal Register announcement states that 110,000 households in San Francisco have dogs. Of these, one third employ commercial dog walkers. (*See* Federal Register, pg. 69786) Below is a calculation to estimate how many commercial dog walkers will conduct their business in the Presidio if this plan is adopted.

- San Francisco has approximately 110,000 households with dogs, which if divided by three equals approximately 35,000 households that employ commercial dog walkers.
- Assuming all of these households have only one dog that is professionally walked once a week; 35,000 dogs divided by 7 days equals 5,000 dogs professionally walked per day.
- Assuming that only 10% of those dogs are walked within the Presidio, that would be 500 dogs per day professionally walked in the Presidio.
- Assuming that half of the dogs would be walked in the morning hours and half of the dogs would be walked in the afternoon hours, which would be 250 dogs in the morning and 250 dogs in the afternoon.
- Assuming that each dog walker is walking 8 dogs; 250 dogs divided by 8 dogs per walker equals about 30 dog walkers.
- If commercial dog walking is permitted in the Presidio it can conservatively be expected that 30 commercial vehicles will be driving into the Presidio, occupying parking spaces and walking up to 8 dogs each on the trails and open spaces every morning and every afternoon.

## Attachment B

### Potential Adverse Impacts of Commercial Dog Walking in Area B

#### Damage to resources and values

- Soundscape – dozens of handlers with hundreds of dogs will produce significant amounts of related sounds including the projected annunciation of commands and barking.
- Viewscape – natural views will be blighted by walkers with eight dogs each. Packs of active dogs are distractive to public programs, tours, and visitors enjoyment of passive recreational activities which require quiet focus.
- Odor – odors produced by dogs could cause wild animals to modify their behaviors, such as mating, migration, feeding, predator avoidance, prey selection, and the establishment of social structures. (NPS MP 2006, 4.11)
- Wildlife – the presence of dozens- of dogs will displace wild animals.
- Parking – visitor parking spaces will be occupied by commercial vehicles.
- Traffic – commercial vehicles will be ubiquitous on park roadways.
- Commercial vehicles – the presence of commercial vehicles adorned with self promotional signage will detract from the visitor experience.
- Urine – urine from hundreds of dogs will adversely impact the soil and groundwater, with the potential to kill native plants and to benefit exotic invasive weeds.
- Damage to plants – hundreds of dogs in native plant communities will affect the growth potential of native plants.
- Damage to soil – hundreds of dogs on trails and in open spaces will affect soil stability and nutritional value with the potential to kill native plants and to benefit exotic invasive weeds. Serpentine soils found throughout the park are low in nutrients, creating a unique niche for the endangered *Clarkia*. Dog urine would upset this balance, and encourage competing plants to grow.
- Tranquility – walkers with groups of eight dogs each on trails and open spaces will diminish the tranquility of the park. This tranquility is REQUIRED to pursue many of the passive recreation activities that have no ‘organized voice’ to represent them: photography, naturalist pursuits, meditative or restorative walking, study of species and plants, painting, drawing, enjoying a unique sensory experience in nature, etc...

#### Threats to public safety

- Fear – packs of eight dogs on trails and open spaces may pose a threatening presence to those unfamiliar or afraid of dogs- including especially the elderly who may be knocked over, and children who are most vulnerable because they have yet to be taught how to interact and are not tall enough to be out of physical reach of dogs.
- Blocking trails and program sites – packs of eight dogs on trails will be disruptive to picnics, public events, tours, programs, and through hikers.
- Trip hazard – packs of eight dogs on long leashes on trails will pose trip hazards to through hikers as well as bicyclists and runners. Parents with running strollers will be unable to proceed on trails clogged with a pack of dogs.
- Attacks and Bites – hundreds of dogs in the park will vastly increase the potential for dog bites to park visitors, individual dog walkers and dogs, park police horses, valued tenants, and staff.

### Visitor conflict

- Displacement from trails and open spaces – park visitors will be repelled from trails and open spaces where dogs and dog walkers have a dominating presence.
- Parking – visitors will compete for parking spaces with commercial dog walking vehicles.
- Tranquility – park trails and open spaces will have a diminished quality of tranquility.
- Contemplative setting – contemplative settings will be compromised by the volume of dogs and their impacts.

### Other

- Unlimited access – the proposal provides for no dog free areas. Park visitors will be subjected to commercial dog walking on all trails and open spaces.
- Additional operating expenses – additional costs will be incurred by the park for administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers.
- Precedent – permitting commercial dog walking will set a precedent for other National Park units.
- Loss of visitors – visitors who are allergic/fearful will avoid the park because of the large volume of dogs.
- Loss of stewardship volunteers – volunteers discouraged by the adverse impacts of commercial dog walking will lose interest in park stewardship.
- Counter productivity – it is counter-productive for the Trust to spend thousands on attracting youth through camp and program development, and encouraging them to become our next park supporters while allowing obvious commercial resource-impairing activities in their presence.

# WILD Equity

## INSTITUTE

*Building a healthy and sustainable global community for people  
and the plants and animals that accompany us on Earth*

February 25, 2013

John Pelka  
Presidio Trust  
103 Montgomery Street  
P.O. Box 29052  
San Francisco, CA 94129  
jpelka@presidiotrust.gov  
To Whom It May Concern:

### **RE: Public Use Limitation on Commercial Dog Walking**

Dear Mr. Pelka:

On behalf of the Wild Equity Institute, its Board of Directors, and members, I submit these comments on the Presidio Trust's commercial dog walking proposal, first announced in the Federal Register on November 21, 2012.

In general, the Wild Equity Institute believes that dog walking in the Presidio Trust and other Golden Gate National Recreation Area units is having adverse impacts on people, our pets, wildlife, and our parks. We concur with the Presidio Trust's conclusion that the activity is "responsible for damage to resources, threats to public safety, and visitor conflict." 77 Fed. Reg. 69,785, 69,786 (Nov. 21, 2012).

However, the Presidio Trust's proposal to manage this problem by adopting the City and County of San Francisco's permitting process for commercial dog walking is fundamentally flawed for several reasons. In the following paragraphs, I will elaborate on each of these three problems.

To resolve these concerns, the Presidio Trust must, at the very least, conduct a thorough environmental review of its proposal, including consideration of alternatives to its proposal, before authorizing this commercial activity in the park. Unfortunately, to date neither the Presidio Trust nor the City and County of San Francisco has conducted *any* environmental review of this proposal. As explained in its Federal Register announcement, the Presidio Trust believes its proposal is categorically exempt from review under the National Environmental Policy Act, and the City and County of San Francisco reached a similar conclusion under the California Environmental Quality Act (although on separate grounds).

The determination that this proposal is exempt from environmental review is confounding,

Presidio Trust must, at the very least, prepare an Environmental Assessment before it moves forward with this proposal.

**I. The Presidio Trust’s Rationale and Data for its Proposal are Inadequately Documented and Contradictory.**

Relying entirely on the City and County of San Francisco’s representations, the Presidio Trust suggests that there are 110,000 households in San Francisco that own dogs, and that one-third of these households employ commercial dog walkers. However, these estimates are based on average pet ownership statistics for the entire nation and compiled by the Humane Society of the United States. For several reasons, including the fact that approximately 60% of San Francisco residents are renters (far higher than the national average) and most residential lease agreements expressly prohibit cats and dogs on the premises, this is likely to be an over-estimate of the number of dogs actually present in this City.

Although it may also be the case that San Francisco residents on average are more likely to desire pets in their homes—and which might suggest the national standards are in fact an underestimate of pet ownership in this City—the existence of two countervailing assumptions is reason alone for the Presidio Trust to conduct thorough environmental review of its commercial dog walking proposal before it is implemented. Indeed, proposed regulations such as these “normally require the preparation of an [Environmental Assessment],” 50 C.F.R. § 1010.11(3)(c), and this is particularly true when the proposal may cause controversial or uncertain environmental affects. 50 C.F.R. § 1010.7(b)(3) & (4). Given the uncertain nature of the number of dogs in San Francisco, and therefore the demand for commercial dog walking, the Presidio Trust must first investigate the uncertain environmental affects of its proposal before it completes this rulemaking process.

The Presidio Trust’s expectation for increased use of the Presidio is also inadequately documented, and in some cases completely contradictory. On one hand, the Presidio Trust suggests that scofflaws will evade regulation by the City and/or the National Park Service by relocating their commercial dog walking operations to the Presidio “in order to avoid the permit fees, requirements, and limit on the number of dogs they may walk,” resulting in “unlimited use” of the Presidio by commercial dog walkers 77 Fed. Reg. at 69,786. But on the other hand, the Presidio Trust claims that implementing this proposal will only “slightly increase” the displacement of dog walkers from the Presidio to other unregulated areas. *Id.* at 69,787. These statements are contradictory: either there are large, virtually unlimited numbers of commercial dog walkers willing to evade regulation at any cost, or there are very few such scofflaws, and the impacts imposed by these individuals will be “slight”. If it is the latter, the only justification the Presidio Trust puts forth for its proposal is undermined.

There is good reason to suggest that it is the latter. Already, 70 commercial dog walkers have registered<sup>1</sup> with the City and County of San Francisco, and there is no indication anywhere in this

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<sup>1</sup> The proposal does not specify whether the business registration precedes the implementation of the City’s new commercial dog walking regulation. But even if it does, it is highly unlikely that a commercial dog walker could evade the City’s new ordinance once it has obtained a general business license from the City—it would be a simple matter for the City to cross-check these lists and determine which business

regulation. Indeed, the Presidio Trust's screening form suggests that only 10% of the City's commercial dog walkers will avoid complying with the regulation—approximately seven commercial operations in total. Over time, this number is predicted to go down as more commercial dog walkers comply with the City regulation. If it is the case that the vast majority of commercial dog walkers have already complied with the City regulation, then the Presidio Trust's fear of being overrun by commercial dog walking operations is completely unfounded: because once registered, there would be no need for the commercial dog walker to evade City jurisdiction by conducting business activity on federal lands.

Under such circumstances, rather than preventing the “unlimited use” of the Presidio by commercial dog walkers, this proposal will reverse a total ban on commercial dog walking and provide for up to 70 new commercial operations to lawfully conduct business within the Presidio—without any environmental review. Indeed, this seems like a far more likely outcome of this proposal than the nightmare scenario offered by the Presidio to justify this proposal. Given the Presidio Trust's acknowledgement that dog walking has significant impacts on park resources, at a bare minimum this suggest that the Presidio must conduct a thorough environmental review process before this proposal is implemented.

## **II. Commercial Dog Walking Is Expressly Impermissible at the Presidio Presently.**

The Presidio Trust's suggestion that this proposal is a public use limitation is a misnomer, because under the Trust's existing legal mandates commercial dog walking is expressly prohibited. All business activities are prohibited within the Presidio Trust unless and until that business activity obtains a contract, permit, or other written agreement from the Trust to conduct that activity within the park. 36 C.F.R. § 1005.3. Moreover, as the Presidio Trust recognizes, there are no special rules or regulations governing commercial dog walking that would exempt it from this general prohibition of business activity. 77 Fed. Reg. at 69,786. Thus, the Presidio Trust's proposal is not a public use limitation, but it is in fact an expansion of commercial and business activities that are “responsible for damage to resources, threats to public safety, and visitor conflict.” *Id.*

Because all business or commercial activity—including commercial dog walking—is prohibited in the Presidio unless and until it is authorized by permit, it is curious that the Presidio Trust believes that there is no current prohibition on commercial dog walking because “it does not impose restrictions specific to Commercial Dog Walkers in Area B.” 77 Fed. Reg. at 69,786. The opposite is true: because the Presidio Trust *has not* created special rules for commercial dog walkers it in fact retains the authority to bar this activity *in toto*.

Rather than adopt the City's policy as its own, the Presidio may address its environmental concerns by simply reminding the public that commercial activity in the park is impermissible,

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entities had failed to comply with the updated registration requirements. Therefore, it is reasonable to expect all 70 of these businesses will comply with the City's new ordinance, and therefore none of these businesses should be expected to avoid City lands in a misguided attempt to conduct their businesses legally.

and no additional enforcement training would be necessary to enforce existing laws.

If, on the other hand, the Presidio Trust no longer wishes to retain its ban on commercial dog walking within the Presidio, it may, either through regulation or through permit, allow commercial uses such as this. However, when the commercial activity will have significant environmental impacts, it may not adopt those permits or regulations without first conducting appropriate environmental review.

### **III. Environmental Review of this Proposal Must Be Conducted Before it Is Instituted.**

The Presidio Trust's proposal must undergo thorough environmental review under the National Environmental Policy Act before it is implemented for many other reasons. The proposal may increase commercial dog walking in the Presidio Trust compared to present authorized levels, causing an uncertain amount of additional damage to park resources, 36 C.F.R. § 1010.7(b)(4); the proposal is of great public controversy and will likely have highly controversial environmental consequences, 36 C.F.R. § 1010.7(b)(3); and it may establish a precedent for ongoing pet management rulemaking affecting the Golden Gate National Recreation Area. 36 C.F.R. § 1010.7(b)(5). For these reasons, categorically excluding the proposal from environmental review is not only unwise, but also unlawful.

Unfortunately, there has never been any environmental review of this proposal—not at the State or Federal level. Instead, both the City and the Presidio have claimed that the proposal is categorically exempt from environmental review.

This is so even though the Presidio Trust's screening form indicates that all of the entities consulted in making this proposal are advocates for commercial dog walking activity—not a single park, conservation, or justice advocate was consulted in the drafting this proposal.

This is so even though none of the criteria for obtaining a commercial dog walking permit in San Francisco address the environmental consequences of the activity—something the Presidio Trust is expressly required to consider by the National Park Service's Organic Act, its own Organic Act, and both the Park Service's and the Trust's own rules and regulations.

This is so even though the proposal acknowledges that, at the very least, short-term environmental consequences are likely to result from this proposal, and yet remain unassessed.

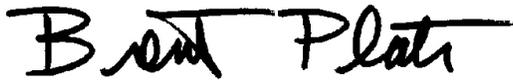
This is so even though the Trust acknowledges that its proposal will require ongoing evaluation to determine if visitor use experiences and public resource protection are effected by the proposal—while refusing to consider these issues before it takes action, as the National Environmental Policy Act requires.

This is particularly disconcerting because the Presidio Trust has many opportunities to regulate commercial dog walking in a manner that will improve visitor experiences and resource protection. Among the opportunities are to require additional limits in the manner, scope, amount, and location of commercial dog walking at the Presidio, none of which are addressed in the Presidio Trust's proposal. For example, practical experience and evidence suggests that

walking more than three or four dogs at once—even when they are on-leash—creates unsafe conditions for people, our pets, and park resources. See Exhibit A. Consideration of alternatives to the City’s proposed limit, which set the number of dogs that may be walked at once based on political, rather than environmental concerns,<sup>2</sup> is one example of an alternative the Presidio Trust must consider to fulfill its obligations as steward of these lands.

The Wild Equity Institute thus urges the Presidio Trust to withhold adoption of this policy until thorough environmental review can be completed.

Sincerely,

A handwritten signature in black ink that reads "Brent Plater". The signature is written in a cursive, slightly stylized font.

Brent Plater  
Executive Director

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<sup>2</sup> See, e.g., How Many Dogs Are Too Many: Cap Increased In Proposed Professional Dog Walking Regulations, SF Appeal, December 13, 2011 (“However, not everyone is completely comfortable with the figure of eight: Rebecca Katz, director of the city's Animal Care and Control Department (which will be in charge of regulating the permits) told the Chron that "she was concerned that eight or nine dogs would be pushing the limit when it comes to a dog walker's ability to properly manage the dogs and clean up after them, but said she would defer to the supervisors to make the final call.").

# EXHIBIT A

## Dog Walkers With Multiple Dogs

by Karen B. London, PhD

There are so many ways to get people who care about dogs to voice strong opinions, and one hot topic lately relates to dog walkers who walk many dogs all at once. Many people have questions and concerns about this, and I am no exception.

It worries me when I see a person walking more than four or so dogs, which is a very challenging thing to do. Many people who walk dogs are very knowledgeable about canine behavior and do what it takes to keep it safe and fun for all the dogs under their care. That includes walking dogs who are compatible with each other, keeping the number of dogs walked simultaneously at no more than four, and preferably even fewer most of the time, and constantly monitoring the dogs for any behavior that could lead to trouble between the dogs, including signs of stress. It takes a lot of education and experience to be able to handle this, and that's why the best dog walkers are more than worth their fees.

Regrettably, not everyone who walks dogs is up to this standard of care. Many people seem to feel that just loving dogs is enough of a qualification to take large numbers of them on a walk, whether the dogs are familiar with each other or not. Still other dog walkers may be putting profits over safety. Obviously with more dogs being walked at once, more money can be made.

This raises many questions, especially in situations where a single person is walking many dogs on leashes at the same time. Can one person watch so many dogs at once in order to monitor their behavior? What if the dogs react to each other or to another dog? How could one person manage such a situation? Are these dog walkers picking up all the poop from so many dogs?

Many other dogs are uncomfortable around such large groups of dogs and become intimidated. This is especially relevant at dog parks, and many people worry about taking their dogs to places where such large groups of dogs are present.

Some places limit dog walkers to four dogs, though it is common in other places to see dog walkers with 8, 10, or even more dogs all at once. Should there be limits on the number of dogs that can be walked by a single person simultaneously in places such as dog parks and other public areas? I think that these kind of limits could help prevent problems, and help keep the dog walkers who truly are responsible from being outcompeted by people who are charging less but perhaps putting dogs at risk. What do you think? How many dogs is too many?

## **DOG OWNER & WALKER ASSOCIATIONS**



**P.O. Box 475372 San Francisco, CA 94147-5372 Please Visit Our Website:  
[www.crissyfielddog.org](http://www.crissyfielddog.org)**

January 22, 2013

Via U.S. Mail and Email ([jpelka@presidiotrust.gov](mailto:jpelka@presidiotrust.gov))

John Pelka  
The Presidio Trust  
103 Montgomery Street  
P.O. Box 29052  
San Francisco, CA 94129

Dear Mr. Pelka,

Thank you for the opportunity to comment on the Presidio Trust's ("Trust") proposed rules to (1) impose a public use limit on persons who are walking four or more dogs at one time for consideration in Area B of the Presidio (hereinafter "Commercial Dog Walkers" or "CDWs"); and (2) expand the requirement to remove pet excrement (collectively the "Rules"). 77 Fed. Reg. 69785 (Nov. 21, 2012) (the "Notice").

We appreciate the Trust's efforts to address these issues, and recognize the Trust's important role in protecting the valuable recreational resources of the Presidio. People have been walking their dogs throughout the Presidio for many generations. We believe it is important for dog walkers to continue to have access in the Presidio, and strongly support allowing CDWs to access Trust-managed areas, so we are appreciative that the proposed Rules do make provision for CDW access. Nonetheless, the adoption of the Rules requires careful consideration and analysis to meet the Trust's legal obligations under the National Environmental Policy Act ("NEPA"), and in this regard, we submit, further work is required.

The Crissy Field Dog Group ("CFDG") is a non-profit organization, which has been devoted to responsible off-leash dog recreation for many years in the Golden Gate National Recreation Area ("GGNRA"). CFDG is deeply concerned by the Trust's proposed wholesale incorporation of the City of San Francisco's CDW ordinance, and in particular, by the Trust's failure to analyze the environmental impacts of its action. Crissy Field is a hugely popular open space area for dog walking and is used by a large number of private and commercial dog walkers and is located within Area A of the

Presidio. The Notice contains a cursory acknowledgement that Area A may be adversely impacted if the proposed Rules relating to CDWs are enacted, but fails to base this conclusion on reliable factual or scientific materials, and fails to conduct any meaningful impact analysis. CFDG submits these comments to urge the Trust to meet its legal obligation to conduct a NEPA-compliant analysis, via, at minimum, preparation of an environmental assessment (“EA”). CFDG would look forward to working with the Trust and participating in an EA process.

### **General Comments Regarding Purposes And Potential Effects of the Proposed Rules**

The Trust’s own stated purposes for the Rules highlight the need for, and lack of, accompanying environmental analysis. In proposing the CDW Rules the Trust states its concern about a potential influx of CDWs into Area B, diverted from City-regulated areas once the City’s CDW permit ordinance (Article 39) goes into effect. The Notice identifies numerous potential effects of dog walking within Area B, which the Rules are intended to manage. The Trust states that Article 39 will result in “a certain number of Commercial Dog Walkers who would otherwise fall under the City’s ordinance will walk their dogs in Area B in order to avoid the permit fees.” (Notice at 69786.)

According to the Notice the effects of such spillover may include, “damage to resources, threats to public safety, and visitor conflict.” (Notice at 689786.) It further states that CDWs may “affect the use and enjoyment of ... users, will increase damages to resources, and will increase the cost of park maintenance and operations.” (Id.) In addition, it states, “Pet excrement is a recognized health hazard, may deface or damage cultural and natural resources, and is widely considered to be a deterrent to use of park facilities.” (Id. at 69787.) The Notice states that the proposed Rules are therefore intended to “provide for the safe enjoyment of all park users, protect resources, and control its operations and maintenance costs.” (Id. at 689786.)

If the Trust enacts its proposed Rules for Area B, CDWs who had previously used Area B may choose instead to use Area A, where no permit is currently required. Indeed, the Notice acknowledges spillover into Area A is anticipated as a result of the Trust’s proposed Rules (Notice at 69787), but undertakes no analysis of the potential effects of such diversion of CDWs. For Area A, the Trust has prepared no analysis of whether the proposed Rules may cause, “damage to resources, threats to public safety, and visitor conflict” or “increase the cost of park maintenance and operations” or otherwise “affect the use and enjoyment of ... users” – despite the fact that these concerns were sufficiently significant for the Trust to propose the Rules in the first instance. The Screening Form referenced in the Notice (“Screening Form”) highlights the potential for “impacts to soils and vegetation caused through physical damage (such as trampling, digging, and dog waste)” and “the potential for nutrients and pathogens from dog waste to enter water bodies.” (Screening Form at II.5.) The Notice and accompanying Screening Form do not analyze why all of the Trust’s concerns about City CDW spillover into Area B should not apply equally to Area A.

Noting that any environmental impacts of spillover may be “short term” does not relieve the obligation to analyze potential impacts (Notice at 69787; Screening Form at I.D.3), and this conclusion is made without factual support or analysis. Even if impacts were short term they still require analysis; construction impacts of an action may be short-term but still routinely receive thorough treatment under NEPA in EAs. Moreover, the Notice identifies no anticipated timeline for implementation of any National Park Service (“NPS”) permitting which may apply in the future to Area A. The Screening Form acknowledges that the timeline for implementation of any such permitting system is uncertain. (Screening Form at I.E.2.)

The Trust has no reliable factual or scientific basis on which to ground its evaluation of the potential harms described in the Notice, and for that reason alone further NEPA analysis is required in an EA. But on its face, the Notice is internally inconsistent. The Rules seek to prevent negative effects of CDWs in Area B, but the Notice admits the Rules will divert CDW traffic into Area A, and fails to analyze the same effects in Area A that it seeks to prevent in Area B. The Trust should fully and openly air its analysis of potential impacts on Area A and other surrounding areas, which may be impacted, by, at minimum, preparing an EA. Only by developing such an analysis can the Trust determine whether such impacts will occur, and if so, where and at what intensity.

### **Specific Comments**

In addition to the above general comments regarding the purposes and effects of the proposed Rules, CFDG submits the following specific comments on the below designated paragraphs and portions of the Notice:

#### **Summary**

*In general.* The Summary should describe the geographic area under Trust’s management (approximately 1100 acres); clarify that the land managed by the Trust lies entirely within the GGNRA; and distinguish between those portions of the GGNRA managed by the NPS and those managed by the Trust (Area B only).

*“The Presidio Trust is proposing a public use limit on persons who are walking four or more dogs at one time (CDW) in Area B of the Presidio.”* The City permits limit commercial dogwalkers to a maximum of eight dogs at one time. The Notice and proposed Rules are unclear as to the maximum number of dogs allowed on land managed by the Trust (i.e., not the City). The same issue comes up throughout the Notice.

*“Commercial Dog Walkers with four or more dogs at one time in Area B will be required to comply with . . . those rules and regulations otherwise applicable to Area B of the Presidio.”* Because the Trust shares administrative jurisdiction of Area B with the National Park Service, “otherwise applicable” regulations include 40 C.F.R. 2.15, which prohibits pets in a national park. The Notice does not explain if (or how) a Trust- or City-issued permit could legally override a federal

regulation. The Notice also omits all mention of the 1979 Pet Policy, which continue to govern the NPS's administration of the GGNRA. *United States v. Barley*, 405 F. Supp.2d 1121, 1125-26 (N.D. Cal. 2005). These legal inconsistencies should be addressed and clarified.

### **Supplementary Information: Section 1. Limitation on Walking Dogs for Consideration**

*In General.* For consistency, the Trust should use the phrase “Commercial Dog Walker” instead of “Walking Dogs for Consideration.”

*Para. 1:* “Administrative jurisdiction over the . . . Presidio of San Francisco is divided between the Trust and the National Park Service.” CFDG respectfully requests that the agency use plain English to describe the relationship between the Trust and the NPS with respect to the Presidio: (1) the Presidio is part of the GGNRA; and (2) the Trust manages the Presidio on GGNRA-jurisdiction lands.

*Para. 2:* “Although the Trust does not maintain official statistics on the use of the Presidio by dog walking businesses, Trust staff frequently observe and receive reports of dog walkers with four or more dogs in a number of areas in Area B . . . .” This is exactly why the Trust needs to conduct an environmental analysis: to evaluate the potential for actual damage to natural resources, threats to public safety, and visitor conflict. The bill establishing the Trust made clear that the agency must comply with NEPA. Pub. L. No. 104-333, § 104(c), 110 Stat. 4097 (Nov. 12, 1996) (“[T]he Trust shall be treated as a successor in interest to the National Park Service with respect to compliance with [NEPA] and other environmental compliance statutes”). The Notice and proposed Rules do not appear to be based on reliable factual or scientific information (qualitative or quantitative) establishing a relationship between the number of dogs with one dogwalker and any particular type of damage or impact to lands or uses. Indeed, the rationale for public use limits and the text of the proposed regulations simultaneously identify “four or more dogs” as (1) sufficient to damage resources, threaten public safety, and cause visitor conflict; and (2) an appropriate number to trigger permit coverage, which would allow the dogwalker to bring in up to four additional dogs. How can the Trust make a significant change without adequate input from the public and proper science to evaluate the public's concerns?

The Screening Form refers to “Trust staff estimates” of a range of numbers of CDWs who may be present “during any given time of day” without further specifics or factual basis. (Screening Form at I.D.3.) The Screening Form goes on to reference oral estimates from the City regarding diversion of City CDWs into Area B – making no independent analysis of diversion from Area B to Area A. These passing references fail to meet the Trust's NEPA obligations because they are either inapplicable, unreliable, or without basis in scientific or factual information. Moreover, an analysis of impacts must be founded on factual and scientific information establishing a relationship between the number of dogs with

one dog walker and particular impacts. Even if the information in the Screening Form were sufficiently reliable, it estimates a 33-66% increase in CDW traffic in Area A – clearly a significant increase in traffic, which, if true, would require analysis of all the potential impacts in Area A. The Screening form acknowledges that the Rules would “increase visitor incidents related to dogs, and demand more park maintenance” but fails to undertake any meaningful analysis of such impacts, the intensity of those impacts, or potential mitigation measures. (Screening Form at I.D.3.) The Screening Form fails to acknowledge or analyze other potential impacts to Area B.

*Para. 4: “[T]he Trust reasonably anticipates a certain number of Commercial Dog Walkers . . . will walk their dogs in Area B in order to avoid the permit fees...This is particularly to be expected because the NPS is also considering restrictions on commercial dog walking in Area A of the Presidio.”* With reference to NPS regulations, the NPS has been very clear that CDWs in Area A and elsewhere in the GGNRA will be restricted to 3 to 6 dogs per dog walker. These numerical thresholds emerged from the GGNRA Negotiated Rulemaking for Dog Management process in 2007, and the NPS clearly documented them in the GGNRA’s Dog Management Draft Environmental Impact Statement. As noted briefly above, the Trust should address this potential future conflict between permitting schemes as part of this rulemaking process. In fact, the Trust has long been aware of this conflict, as Trust proposed to the City in a letter dated November 21, 2011, that the City be consistent with the GGNRA’s CDW numbers. (A copy is attached).

*Para. 4: “The Trust must provide for the safe enjoyment of all park users . . . and is therefore undertaking this public use limit in response to the changing circumstances in the surrounding area.”* The Trust relies on a categorical exclusion to avoid its obligations under NEPA. 77 Fed. Reg. at 69787 (citing 36 CFR 1010.7(a)(31), which exempts “minor changes in programs and regulations pertaining to visitor activities”). The proposed Rules are not a “minor change” to an existing program but rather the implementation of an entirely new permitting program at the Presidio. Indeed, categorical exclusions are only available for a “category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effect.” 40 C.F.R. § 1508.4. If change is happening on the scale indicated by the Notice, the public use limitations could result in a cumulatively significant impact. These impacts could include higher levels of air pollution due to dog walkers making multiple trips by car to meet the needs of the same clients, potential impacts to surrounding areas resulting from diversion of CDW traffic, and potential effects of conflicting and inconsistent regulations and permit schemes. In addition, the Trust’s proposed Rules must be considered in light of the City’s Article 39 ordinance. *See also* 36 C.F.R. § 1010.7(b)(6). Together the Rules and the City’s CDW ordinance may have significant impacts on Area A, which upon issuance of the Rules would remain the only non-permitted area for CDWs in the vicinity. In light of these potential impacts, CFDG does not believe

that a categorical exclusion is appropriate, and the Trust should conduct a NEPA analysis for this rulemaking.

*Para. 8: “Upon the completion of the NPS rulemaking, the Trust may amend its own use limitation for Commercial Dog Walkers to recognize GGNRA permits as valid within Area B among other permits, to accept GGNRA permits exclusively, or otherwise in response to new circumstances.”* To the extent the Trust takes an independent action in the future by amending any use limitations, any such amendment would constitute a separate action for purposes of NEPA, subject to independent review and analysis at the time that future action is contemplated. The quoted language in paragraph 8 of the Notice should be supplemented or modified to clarify that the instant action is limited only to the adoption of the Rules as currently proposed, and the Trust would undertake a new review and environmental analysis, consistent with NEPA, for any revision to the Rules that may occur in the future.

*Para. 9: The Presidio Trust “retains its independent authority to define the requirements for Commercial Dog Walkers within Area B.”* This language is especially worrisome given the Trust’s position that this sort of change is categorically excluded from NEPA review. Even if the “minor changes” categorical exclusion applied, this sets a dangerous precedent for imposing burdensome new regulations without proper environmental analysis and public input. Actions that “establish a precedent for future action” may trigger a NEPA analysis even in the face of an applicable categorical exclusion. 36 C.F.R. § 1010.7(b)(5).

## **Section 2. Requirement to Remove Pet Excrement**

CFDG does not object to this proposed rule, but respectfully requests that the Trust provide adequate waste bins.

### **Environmental Impact**

Trust asserts that (1) the “proposed rule will increase visitor safety and protect resources in Area B”; (2) “dog walking use in Area A could slightly increase as those who walk dogs for consideration . . . may take their dogs to walk in Crissy Field or other areas where permits are not currently required by the NPS.” Without a NEPA analysis, Trust has no actual, concrete information as to the environmental baseline and environmental impacts of its proposed Rules. Situations where the effects of an action are highly uncertain can trigger NEPA review for otherwise exempt actions. 36 C.F.R. § 1010.7(b)(4).

The Trust’s NEPA regulations provide that “[a]n EA should be prepared when the Trust has insufficient information on which to determine whether a proposal may have significant impacts.” 36 C.F.R. § 1010.10(a). This is plainly the case here. Moreover,

because the Rules have the potential for cumulative impacts and for impacts to recreational resources, they fall within the type of actions the Trust has identified as “normally” requiring an EA. 36 C.F.R. § 1010.10(b)(2), (3).

CFDG appreciates the opportunity to comment on the Trust’s proposed rulemaking and Project Screening Form, and respectfully requests that in light of the above considerations the Trust prepare, at minimum, an EA for the proposed Rules.

Sincerely,

Martha Walters  
Chair, Crissy Field Dog Group

Enclosure

Ccs: House Minority Leader Nancy Pelosi, D-CA  
Senator Diane Feinstein, D-CA  
Senator Barbara Boxer, D-CA  
Rep. Jackie Speier, D-San Mateo  
Rep. Jared Huffman, D-Marin  
Kenneth Salazar, Secretary of the Interior  
Jon Jarvis, National Park Service Director  
Christine Lehnertz, NPS Western Regional Director  
Frank Dean, Superintendent, GGNRA  
Craig Middleton, Executive Director, Presidio Trust  
Nancy Bechtle, Chair, Presidio Trust Board  
Supervisor Scott Wiener, City of San Francisco  
Dr. Jennifer Scarlett, Co-President, SF SPCA  
Rebecca Katz, Executive Director, Animal Care and Control  
Nancy McKenny, Executive Director, Marin Humane Society



**P.O. Box 475372 San Francisco, CA 94147-5372 Please Visit Our Website:  
[www.crissyfielddog.org](http://www.crissyfielddog.org)**

February 25, 2013

**Via U.S. Mail**

And Email ([jpelka@presidiotrust.gov](mailto:jpelka@presidiotrust.gov))

Craig Middleton  
Karen Cook, Esq.  
The Presidio Trust  
103 Montgomery Street  
P.O. Box 29052  
San Francisco, CA 94129

Dear Craig and Karen,

I write to follow up on our meeting February 21, last week. Thank you for the opportunity to meet and discuss our written comments on the Presidio Trust’s proposed rules regarding commercial dog walkers (or “CDWs”). We appreciate your making the time to discuss this issue.

As we indicated during the meeting, the Crissy Field Dog Group (“CFDG”) appreciates the Presidio Trust’s efforts to make continued accommodation for dog walking. However, as we stated in our initial comment letter and during our meeting, we believe additional basic information is required to allow for good fact-based planning, and to meet the requirements of the National Environmental Policy Act (“NEPA”). CFDG believes a categorical exclusion (“CE”) is inappropriate for the proposed rules, and cannot be maintained given the current state of information. Without reliable data on current and anticipated CDW traffic in the Presidio Trust and surrounding areas, including Area A, the Presidio Trust cannot make the necessary findings required by its own NEPA regulations, or regulations promulgated by the Council on Environmental Quality to justify a CE. See, e.g., 36 C.F.R. § 1010.10(a); 40 C.F.R. § 1508.4.

As we highlighted during our discussions, CFDG is concerned about the potential for spillover of CDW traffic from Area B into Area A if the Rules go into effect as proposed. The Screening Form and Federal Register Notice for the proposed rules both acknowledge potential impacts in Area A, but lack sufficient information to make a

reasoned determination or take the requisite “hard look” at potential impacts as required by NEPA. One of the basic principles of NEPA is decisions should be based on good data, and such data is currently lacking. Analysis of a reasonable range of alternatives in a focused environmental assessment (“EA”) is appropriate here. Deferral would avert the potential for cumulative impacts in Area A. CFDG proposes that the Presidio Trust consider deferring implementation of the proposed rules to be in sync with the timeline for anticipated rules being developed for the rest of the Golden Gate National Recreation Area (“GGNRA”). Deferral would have the additional benefit of allowing an efficient collection of data on which to base a decision; the Presidio Trust could establish a baseline of current existing conditions, and reevaluate conditions after the implementation of City regulations of CDWs. Comparison of these data sets would allow the most informed choice on the need for the rules and potential diversion rates. These considerations have not been addressed in the Screening Form or Federal Register Notice to date for the proposed rules. We expect and anticipate that the Presidio Trust will meet its obligations to comply with NEPA prior to adopting the proposed rules, and in keeping with that obligation hope that you take into account these further comments.

And Karen, in the meeting you mentioned that the proposed rule for commercial dog walking in the Presidio is an interim measure and the intention is for the Presidio Trust to adopt the GGNRA’s commercial dog walking regulations when their dog management rule is finalized.

The proposed rule does not mention the word interim and CFDG nor the public can assume that this “interim rule” will be just that. The language in the proposed rule does not mention any pathway to adopt the GGNRA’s final rule concerning this issue. We ask that the Presidio make clear in the terms of the rule that it is an interim measure and specify its effective duration. In addition, we again request that the Presidio make clear that any future revision to the proposed rule be considered a separate action under NEPA subject to additional NEPA review.

We again thank you for your time and attention to this matter, and look forward to working with you in the future on important dog management issues in the Presidio and other areas located within the GGNRA.

Sincerely,

Martha Walters  
Chair, Crissy Field Dog Group

**From:** [Bruce Wolfe](#)  
**To:** [Pelka, John](#)  
**Subject:** Support Commercial Dog Walking Permit  
**Date:** Thursday, February 21, 2013 3:01:56 PM

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Dear Mr. Pelka,

This is an official support statement from DogPAC of San Francisco.

We support the proposed Commercial Dog Walking Permit for these reasons:

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.
4. We disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. The Trust cannot make statements like that without providing evidence to support them, and anecdotal evidence does not count.

Thank you.

Respectfully,

Bruce Wolfe, President  
DogPAC - San Francisco



## PUBLIC COMMENT ON COMMERCIAL DOG WALKER PERMITS

February 24, 2013

John Pelka  
 Presidio Trust  
 103 Montgomery St  
 P.O. Box 29052  
 San Francisco, CA 94129

Dear Mr. Pelka,

I am writing this public comment on the Presidio Trust's Proposal for a Public Use Limit on Commercial Dog Walking as Chair and representative of the San Francisco Dog Owners Group. SFDog is the largest citywide dog owners/guardians group in the city, with a thousand active members, and at least a thousand more that we reach regularly through our emailed newsletters and listserves. SFDog pushes for responsible dog guardianship, and advocates for off-leash recreation for dogs that are under voice control. We are a 501(c)(3) nonprofit, and work to educate dog guardians, non-dog people, and elected and appointed officials about responsible dog guardianship and the benefits of having a dog in our modern, often isolated, society. We have organized workshops on how to deal with the three most common dog behavior problems seen in parks (poor recall, jumping, and resource guarding), and publish a Park Petiquette flyer (how to behave in a park with your dog) that has been posted in city parks for years.

We conducted a Dog-Horse Socialization workshop to desensitize dogs to the presence of horses. This workshop was conducted in conjunction with the SF Police Department's Mounted Patrol unit, who provided the horses and riders for it. We organized workshops on understanding dog body language and behavior for gardeners and rec center staff of the SF Recreation and Park Department. We helped design and implement a pilot "Kids Read to Dogs" program (called Pawsitive Reading) with the SF Boys and Girls Clubs to foster literacy in at-risk populations of children. We work with members of the SF Board of Supervisors, along with SF Recreation and Park Department staff, and other citywide groups on dog issues in parks and elsewhere in the city. SFDog had two representatives on the GGNRA's Negotiated Rulemaking Committee, and has been involved in off-leash (and other dog-related) issues in the GGNRA for over a decade.

SFDog supports dog walking in the Presidio, whether by commercial dog walkers or dog owners/guardians. People have walked with their dogs on Presidio land for generations, and this recreational activity should be continued. While some dogs are walked on-leash, others are walked off-leash and have been for decades. Several parts of the Presidio were included in the 1979 GGNRA Pet Policy that designated areas where off-leash dogs could be walked. Off-leash dog walking should be continued in the Presidio Area B, and the Presidio Trust must designate off-leash areas within its boundaries.

Dog behaviorists nearly universally view off-leash play for dogs as critical for well-exercised, well-behaved dogs. I have attached at the end of this comment, four statements made by the most well-known and well-respected dog behaviorists in the Bay Area, originally submitted as part of my public comment on the GGNRA Dog Management Plan DEIS. These statements illustrate the importance of adequate off-leash space for the physical and behavioral health of dogs and their positive interactions with people.

Dog walking also has tremendous health benefits for people, especially seniors. Studies have shown that:

- Dog walkers were 69% more likely to engage in long-term physical activity than non-dog walkers (Reeves, Rafferty, et al, March 2010, *Journal of Physical Activity and Health*, vol 8, issue 3)
- Among those who took their dogs for regular walks, 60% met the federal criteria for regular moderate or vigorous exercise. Only one-third of those without dogs had the same levels of exercise (Reeves, Rafferty, et al)
- “the adjusted odds of achieving sufficient physical activity and walking were 57% and 77% higher among dog owners compare with those not owning dogs” (Cutt, Giles-Corti, et al, January 2008, *American Journal of Public Health*)
- Seniors in an assisted-living facility improved walking speed by 28% if they walked with a dog, but by only 4% if they walked with a human companion (quoted in the March 14, 2011 edition of the *New York Times*)

Wherever dogs are walked, you will find a vibrant social community of people. This is true for the people who live in and regularly visit the Presidio. People see one another at the same time every day, friendships grow, and a sense of community is born and flourishes. The Presidio Trust should preserve dog walking – including off-leash dog walking – on its lands.

Commercial dog walking has also taken place in the Presidio for decades. Professional dog walkers provide a necessary and vital service for dog owners – they help us keep our dogs healthy and exercised during the week while we are at work. A well-exercised dog is a well-behaved dog, and well-behaved dogs benefit everybody. Commercial dog walking should be continued in the Presidio.

Opponents of professional dog walking in the Presidio cite its “commercial” nature as justification for excluding it from the Presidio. However, there are many commercial entities in the Presidio, including Lucasfilm’s Letterman Digital Arts Center, Sports Basement, the House of Air Trampoline Park, and many others. SFDOG supports commercial dog walkers in the Presidio.

SFDOG supports the Presidio Trust’s intent to accept San Francisco City Permits for Commercial Dog Walkers. We worked with Supervisor Scott Wiener as he wrote the legislation that created the Pro Dog Walker permits, and we have been working with SF Animal Care and Control on how to implement it.

We see no reason for the Presidio Trust to create its own Pro Dog Walker permit. There is no need for a duplication of efforts. The City of San Francisco considered Best Practices for Commercial Dog Walking when developing its regulations, and it makes sense for the Presidio to accept the City’s permit.

SFDOG supports permits for commercial dog walkers as a way to make them more accountable and to encourage more professional behavior. That is reason enough for the permits. However, the proposal in the Federal Register cites “reports from park visitors” that dogs cause significant damage to the environment and pose major safety risks as the reason for the proposed use limitation. Public policy should not be based on anecdotal claims; it must be based on solid evidence, and none is presented here. In our public comment on the GGNRA’s Dog Management Plan, we showed that there is no scientific evidence that people walking dogs cause significant environmental damage or pose a major safety risk. The anecdotal claims in this proposal are unnecessary and should not have been made.

The statement in the Federal Register that the Presidio Trust can amend the commercial dog walker permit regulations in the future when the GGNRA’s Dog Management Plan goes into effect or for other reasons has caused

some confusion. The statement seems to imply the changes will be done without the Trust taking any further public comment. We encourage the Trust to make it clear, in writing in the final regulation, that any changes to the use limitation for commercial dog walkers proposed in the future will only be made after taking and considering a new round of public comment. The public process must be respected.

The Presidio Trust cannot adopt any part of the GGNRA's Dog Management Plan when it is finalized because that plan – and the environmental review done for it – is very site specific, and its results cannot be generalized to any other park.

SFDOG encourages the Presidio Trust to accept the San Francisco Commercial Dog Walker permits.

Sincerely,

Sally Stephens  
Chair, SFDOG

**STATEMENT FROM RENOWNED DOG BEHAVIORIST IAN DUNBAR**  
**Submitted as part of public comment on the GGNRA Dog Management Plan DEIS**

March 31, 2011

Dogs and cats and other domestic animals are the new nature in towns and cities where old nature has already been destroyed by concrete and tarmac. If cities further restrict off-leash areas for dogs, most certainly there will be an increase in the number and severity of dog bites for which responsible legislators (GGNRA, SFBoS, City of SF) no doubt will be held legally and financially responsible.

Apart from being fun and entirely necessary for physical and mental well-being, major reasons for play are 1. For dogs to learn to inhibit the force of their weapons, specifically for dogs to learn bite inhibition towards other dogs and people and 2. For dogs to socialize with other dogs and people.

Socialized dogs like other dogs and people and so don't want to bite them. Bite inhibition (having a "soft mouth") prevents serious damage should the dog ever react when frightened, provoked, or hurt. We cannot train dogs to never react but it is easy for dogs to learn not to hurt other dogs or people when they react. And, they learn this by playing and socializing with other dogs and people. A human analogy would be: Whereas it is very difficult to teach people never to disagree, argue or lose their tempers, it is pretty easy to teach people not to punch, stab or shoot when they do so.

There is absolutely no doubt in my mind that restricting off-leash areas for dogs will be a social, public health and legal disaster for parks and cities.

Ian Dunbar, BVetMed, PhD, MRCVS, CAAB

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About Ian Dunbar

Veterinarian, animal behaviorist, and dog trainer, Dr. Ian Dunbar received his veterinary degree and a Special Honors degree in Physiology & Biochemistry from the Royal Veterinary College (London University) plus a doctorate in animal behavior from the Psychology Department at UC Berkeley, where he researched the development of social hierarchies and aggression in domestic dogs.

He has authored numerous books and DVDs about puppy/dog behavior and training, including AFTER You Get Your Puppy, How To Teach A New Dog Old Tricks and the SIRIUS® Puppy Training video.

<http://www.siriuspup.com/index.htm>

**STATEMENT FROM RENOWNED DOG BEHAVIORIST TRISH KING**  
**Submitted as part of public comment on the GGNRA Dog Management Plan DEIS**

March 10, 2011

To Whom It May Concern:

I am a Certified Pet Dog Consultant and Certified Pet Dog Trainer. I have been active in the dog behavior and modification arena for the last 30 years, 22 of them at the Marin Humane Society. I see approximately 500 clients individually per year, in addition to teaching workshops, seminars and classes.

I would like to address several potential issues with regard to the further restriction of off leash areas for dogs:

**1) Do dogs need to play off leash?** Dogs have certain socialization and exercise needs that cannot be met solely by on leash walking. They must have aerobic exercise, and playing in large areas can accomplish that goal. In addition, in order to be properly socialized, dogs should see and occasionally interact with other dogs.

**2) Will depriving dog owners of a variety of off leash areas lead to behavior issues?** It is very likely that behavior problems will increase dramatically if the amount of space dogs can use is reduced. When dogs cannot get the exercise they need, they become more destructive, vocal and occasionally aggressive. This in turn may lead to the relinquishment of more dogs to animal shelters, which are often already overly crowded with unwanted pets.

**3) Can normal dog parks fill the dogs' needs?** Unlike open space or beach areas, which encourage dogs and their guardians to actually move, dog parks generally discourage walking and inadvertently encourage inappropriate interactions, including territoriality, bullying and the formation of packs. The reduction of open space accessibility will directly cause the over-population of dog parks. This will lead, in my opinion, to many more aggressive incidents among dogs and their guardians.

I believe the adoption of the GGNRA restrictions will backfire on San Francisco as well as other bay area cities, as guardians with dogs try to find friendly places to interact. I also believe that the caretakers of parks and recreation areas have an obligation to make areas available for all types of people and their pets, and not restrict a huge portion of the taxpaying population from accessibility.

Sincerely,

*Trish King*

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Trish King, CPDT, CDBC  
Behavior & Training Director  
Marin Humane Society

**STATEMENT FROM RENOWNED DOG BEHAVIORIST VERONICA BOUTELLE**  
**Submitted as part of public comment on the GGNRA Dog Management Plan DEIS**

April 7, 2011

There can be no doubt that regular off leash play and exercise creates more socially appropriate behavior in dogs. Urban dog trainers spend a great deal of their time addressing behavior issues tied to a lack of regular socialization and exercise: human aggression, dog-dog aggression and reactivity on and off leash, jumping to greet strangers, excessive barking, fear and anxiety conditions, etc. Though these issues exist in San Francisco as well, they are far less common and dog professionals here generally attribute that difference in large part to the preponderance of off-leash play opportunities afforded dogs in the Bay Area.

Should these opportunities be removed we should prepare ourselves to see an increase in dog to dog and dog to human aggression incidents in the city and surrounding areas. This will happen as dogs become less practiced in meeting each other and less well exercised, and due to what is referred to as on leash “barrier frustration.” It is a well-known phenomenon in the dog training industry that dogs are far more likely to display aggressive behavior toward other dogs and people when on leash. For some dogs this is a result of repeated and ongoing frustration at being unable to adequately interact with other dogs. For others it is simply a symptom of the fight-or-flight instinct. Removing a dog’s ability to move away from another being when frightened or overstimulated makes an aggressive display (designed to move the other being farther away) the remaining option. This behavior is seen far more commonly in dogs that do not have off leash play opportunities than in dogs who do.

The argument that the GGNRA proposal will leave some areas off leash is a specious one. Forcing a large number of dogs into a small number of spaces will only create new problems. Though dogs need off leash time to exercise, and though dogs who have this regularly are more likely to be sociable toward their own, forced tight proximity of a large numbers of dogs is a recipe for conflict. Should the targeted areas in the GGNRA proposal be closed we should expect to see a significant rise in incidents in the remaining park areas as they become overcrowded with dogs.

Veronica Boutelle  
Founder & President of dog\*tec  
Former Director of Behavior & Training for the San Francisco SPCA  
Co-creator and Instructor for the Dog Walking Academy

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About Veronica Boutelle, MA Ed., CTC

Veronica is the former Director of Behavior & Training at the San Francisco SPCA. She has been helping dog professionals create their dream businesses since 2003.

Veronica is the author of *How to Run a Dog Business* and the co-author of *Minding Your Dog Business*, writes business columns for APDT’s Chronicle of the Dog and the Canadian APDT’s Forum, and is a sought-after speaker at conferences and dog training schools across the country.

NOTE: dog\*tec, founded by Veronica Boutelle, is the only currently existing program in the Bay Area to train professional dog walkers.

## **Transcript: Comments to SF Animal Control and Welfare Commission**

**By Jean Donaldson, SF/SPCA**

**2/8/07**

### **Submitted as part of public comment on the GGNRA Dog Management Plan DEIS**

Donaldson: Good evening. I'm Jean Donaldson. I'm from the San Francisco SPCA. I'm here to talk about a rather narrow aspect of this issue which is the issue of safety, i.e., the contention that unrestrained dogs pose any kind of threat to the citizens of San Francisco or to each other, or that being allowed off-leash to play contributes to the likelihood of aggression of any kind.

There is not only no evidence that allowing dogs off-leash for play opportunities increases the incidence of aggression, to a person every reputable expert in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access *decreases* the likelihood of aggression.

Off-leash play has not proven to be a factor in dog bites. According to both the Centers for Disease Control and Prevention and the American Veterinarian Medical Association, the majority of bites take place on the guardians' property. The remaining incidents involve dogs that are either restrained, i.e., leashed, or dogs that are "at large", [that is,] unsupervised dogs that have escaped confinement.

Consider for example, the three highest profile serious dog attacks in the history of San Francisco. Those are Diane Whipple in 2001, Sean Jones in 2001, and Nicholas Faibish in 2005. In the first, the dogs were on-leash. In the second, the dogs had escaped confinement in the backyard and were at large. And in the third, the dog was confined in the guardian's home. I would add that in all these instances, the dogs were un-neutered.

There is no research demonstrating that dog parks or off-leash play contributes to any kind of aggression, including dog-dog aggression. It was brought to my attention a couple of months ago, that claims were being made that such research existed. And so I did an exhaustive literature search as well as consulting at length numerous colleagues in dog behavior in the United States. All were amazed at the suggestion in view of no such research.

Interestingly, it could very well be that the safest dogs are those that *attend* off-leash dog parks. Shyan and cohorts published a research paper in 2003 in the Journal of Applied Animal Welfare Science which looked at the prevalence of interdog aggression in dog parks. Dog-dog problems turned out to be minimal and of a non-serious nature. While the paper did not consider the question of dog-to-human aggression, the obvious interpretation of this low incidence of aggression was interesting and I think very relevant. They suggested that self-selection operates strongly, i.e., people who take their time to get into their car or walk to a designated off-leash area to exercise their dog tend to not to be the type who are derelict in other areas of dog guardianship, such as training, socialization or appropriate containment.

Trish King, my counterpart at the Marin Humane Society, has been publicly quoted several times as having authored research concluding off-leash play contributes to aggression. I spoke to her at length about this and we corresponded in the last couple of weeks. She has *not* performed or published such research. She is furthermore, and I quote, "mortified", unquote, that anyone would suggest or imply that. She believes off-leash access, if anything, prevents aggression.

Priscilla Feral, the president of Friends of Animals, *often* has also been quoted as opposing off-leash access. I spoke to her this past Monday regarding Friends of Animals' position, and she was adamant that statements suggesting that Friends of Animals oppose off-leash access are false.

The same holds true for Kathy Santo, a nationally recognized colleague of mine. I also spoke to her this week. She followed up the conversation with me with an email, which I will now quote: "Hi Jean. I wanted to email you and clarify my stance on dogs engaging in off-leash play. I strongly believe that it is good, or more accurately *necessary* for healthy dogs to play off-leash in safe areas while supervised by their owners. An exercised, socialized dog is a happy and well-adjusted dog."

To conclude, it is terribly important that the words of credible sources such as these not be twisted to advantage by either side in this issue. I, therefore, will put any interested Commission member in direct contact with Ms. King, Ms. Feral, Ms. Santo, or other authorities quoted so that they may get *firsthand* their positions on this issue, Thank you for your attention.

Article referred to in her statement:

“Bark Parks”—A Study on Interdog Aggression in a Limited-Control Environment

Melissa R. Shyan, Kristina A. Fortune, and Christine King

Journal of Applied Animal Welfare Science, vol 6, no 1, 2003

**From:** [nancy\\_stafford](#)  
**To:** [Pelka, John](#)  
**Subject:** 36 CFR Part 1002 Commercial Dog Walking  
**Date:** Monday, February 25, 2013 10:50:41 PM

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Hello John Pelka,

People have enjoyed walking their dogs in the Presidio for generations. More recently, over the past three decades or so, commercial dog walkers have been walking their clients' dogs in the Presidio as well.

Commercial dog walkers provide a valuable service by keeping dogs healthy and well exercised for our clients while they are working and unable to attend to their pets' needs. There are a number of commercial enterprises in the Presidio. Some of us have clients working for those businesses. Because the Presidio is a National Park within a dense urban environment, it requires a unique approach in managing the land to accommodate everyone. We understand that the GGNRA's 1979 Pet Policy has served as the only recognized guidance for the public about where dogs are allowed under voice control in this 1400 acre public park.

Our organization is concerned about preserving reasonable areas to walk dogs in the city and supports the proposal to recognize San Francisco City Permits for Dog Walkers. We do not believe accepting City Permits will increase the number of dog walkers within the Presidio. However, we totally oppose the part of the rule which will allow the Presidio Trust to change the Commercial Dog Walking Regulations contained in the proposal at any time in the future and without further public comment.

In response to your request for information regarding the number of commercial dog walkers in the Presidio, it is unclear, since we are unaware of any surveys or studies on this question. Due to the lack of data, any number seeking to define how many Commercial Dog Walkers in the Presidio on a daily or weekly basis would be undocumented guesswork. Based on our experience, there has been an increase in the number of commercial dog walkers, over the past three decades, in San Francisco and on GGNRA lands ( in all 3 counties).

It is estimated by the SFSPCA ( in 2011) there are 178,000 dogs in the city. A 2009-2010 survey by the U. S. A. Pet Food Manufacturers found 39% of households have dogs. A later survey in 2011 by Parade Magazine raised the number to 42% of U. S. A. households.

We suggest the Presidio Trust, as manager of these 1400 acres of public land, conduct its own survey (over a reasonable period of time) to more accurately portray the number of commercial dog walkers in the Presidio. Such a study would provide invaluable information to allow officials to plan for future needs in a rational fact-based manner.

Submitted by: Nancy Stafford, Co-Director on behalf of the San Francisco Professional Dog Walkers Association

## **OTHER ORGANIZATIONS**



# NEIGHBORHOOD ASSOCIATIONS FOR PRESIDIO PLANNING

Box 29086, Presidio Station, San Francisco, California 94129

415-990-9059

Cow Hollow Association

February 22, 2013

Golden Gate Valley Neighborhood Association

Mr. John Pelka  
The Presidio Trust  
P.O. Box 29052  
San Francisco, CA 94129

Lake Street Residents Association

Laurel Heights Improvement Association

**Re: Proposed Regulation on Public Use Limit on Commercial Dog Walking in Area B of the Presidio**

Marina Community Association

Dear Mr. Pelka:

Neighborhood Associations for Presidio Planning (NAPP) supports the Trust's proposed regulation, which we understand is intended to serve as an interim solution until the Park Service finalizes its revised regulations on this subject for Area A of the Presidio.

Pacific Heights Residents Association

Sincerely,

Planning Association for the Richmond

William R. Shepard  
Board Chair

Presidio Heights Association of Neighbors

Presidio Terrace Association

Sea Cliff Properties Association



5758 Geary Boulevard, #356, San Francisco, CA 94121-2112  
 VMs & Faxes: (415) 541-5652; Direct: (415) 668-8914; Emails [president@sfpar.org](mailto:president@sfpar.org)

January 7, 2013

Mr. John Pelka, Presidio Trust ✓  
 103 Montgomery Street  
 Post Office Box 29052  
 San Francisco, CA 94129

**In Re: Comments With Regard To The "Proposed Public Use Limit on Commercial Dog Walking: Revised Disposal Conditions" (36 CFR 1002)**

Dear Mr. Pelka:

For generations, San Franciscans have used Fort Funston, Lands End, Ocean Beach, the Presidio and other properties within the City and County of San Francisco to walk their dogs without regard to any particular rules or regulations. Since the four specific properties identified in the preceding sentence have now been incorporated into the Golden Gate National Recreation Area, the National Park Service has begun the process of developing and promulgating Federal Rules and Regulations to provide standards of conduct for walking dogs on those and other properties within the GGNRA. It is projected at least another year will be required to complete that process.

Last February, the Mayor and the Board of Supervisors of the City and County of San Francisco enacted an ordinance (i.e., the "Tails Ordinance") which, when it takes effect in July of 2013, will regulate commercial dog walkers on its park properties. While all of those local park properties are adjacent to the GGNRA, some are immediately adjacent to it.

As a result, the Presidio Trust is proposing a temporary public use limit on all commercial dog walkers in Area B of the Presidio (i.e., that portion of the GGNRA for which it is responsible) requiring such persons to be in full compliance with San Francisco's "Tails Ordinance". Such persons will be required to possess a valid Commercial Dog Walkers Permit from the City and County of San Francisco and to comply with all of the ordinance's terms and conditions. In addition all commercial and recreational pet walkers in that area will also be required to comply with new requirements for the collection and proper disposal of all excrement.

Because the proposed application of San Francisco's Ordinance would provide uniform standards of conduct for commercial dog walkers on local and GGNRA-Presidio parklands, because it would remove any incentive for commercial dog walkers to use the GGNRA-Presidio park land to avoid complying with San Francisco's Ordinance, because it would provide a temporary standard of conduct for all commercial dog walkers in the Presidio while permanent federal rules and regulations are being developed for the entire GGNRA and because those experiences may inform the development of those permanent federal rules and regulations, PAR supports the temporary public use limit being proposed for the Presidio.

Sincerely,

Raymond R. Holland  
 President

Cc: Bill Shepard (NAPP), Superintendent Frank Dean (NPS), Mayor Ed Lee, Supervisors Mark Farrell, Eric Mar and Scott Wiener,



February 25, 2013

Re: Proposed Public Use Limit on Commercial Dog Walking

Dear Mr. Pelka:

The Presidio Historical Association is deeply concerned by the Trust's proposal to permit commercial dog walking on the Presidio - a National Park and a National Historic District. Commercial dog walking will almost certainly adversely affect the public's enjoyment of the National Historic District and the Cultural Landscape of the Presidio.

Our suggestion is that the Trust's restrictions not be less than those imposed in other National Parks, that is as we understand it, that no commercial dog walking be allowed under any conditions.

At a minimum, we suggest that you delay any commercial dog walking until after the National Park Service rule-making process and decision on this subject in the NPS portion of the Presidio is complete, and that you in no event permit dog walking on your area of the Presidio that would be prohibited by the NPS in Area A.

Sincerely,

Gary Widman  
President

cc:  
Frank Dean  
Presidio Environmental Council  
Jan Blum  
Steven Krefting

## **INDIVIDUALS**

**From:** [Cindy Abbott](#)  
**To:** [Pelka, John](#)  
**Subject:** Support for Commercial Dog Walking in the Presidio  
**Date:** Friday, January 18, 2013 4:11:21 PM

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I live in Pacifica and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Yours truly,  
Cindy Abbott



**From:** [Susan Agnew](#)  
**To:** [Pelka, John](#)  
**Subject:** Please! NO dog walking in Presidio  
**Date:** Tuesday, January 29, 2013 4:24:50 PM

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Dear Mr. Pelka,

I sincerely hope that professional dog walking will not be permitted in the Presidio.

I go to national and state parks to get away from the hordes of dogs that descend upon the regional parks where they are permitted.

I am allergic to dogs and poison oak, and people walking several dogs on leashes take up the entire pathway, forcing hikers to find a spot off the trail in the bushes to avoid contact with dogs.

And forget birdwatching, or having the pleasure of seeing rabbits or even bobcats while out quietly hiking; dogs with their noise and chasing behavior cause most wildlife to hide or leave the area.

Although in theory dogwalkers pick up all dog waste, that only includes the solid wastes. Dog urine is injurious to plants where it is frequently deposited.

Some trails in the regional parks are lined with piles of dog poop. And the smells that remain after the dogs have left have an impact on wildlife use of trails and open space.

I volunteer at a botanic garden that has a parking lot also used by dogwalkers throughout the winter.

The parking spaces are frequently taken up mostly by dogwalkers, and the dogs cause disturbance by barking, chasing, running into the road, approaching people who have not invited contact, and molesting newts when they are present after rain has moistened the roadway (closed to protect the newts from cars). Leash requirements are not adhered to by the dogwalkers.

Please leave us this last respite from dogs and dogwalkers.

It is not appropriate to have this type of commercial use in a national park.

Thank you for your consideration,

Sincerely,

Susan Agnew

**From:** [Julie Alden](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walking  
**Date:** Saturday, January 12, 2013 11:40:00 AM

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Please do not allow commercial dog walking in the Presidio. There is no benefit to the community at large for this proposal to be adopted. It will be costly, create messes, destroy plantings, and generally discourage people from just enjoying the quiet nature of this National Park.

Albert and Julie Alden

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** CALL FOR ACTION! Dogs in the Presidio  
**Date:** Monday, February 25, 2013 7:24:58 PM

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Dear Mr. Pelka,

I am in support of the 3 bullet points listed below regarding dogs in the Presidio:

> 1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

>

> 2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

>

> 3. What we DON'T SUPPORT is the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, or change, without public comment, any part of the commercial dog walker regulations in the current proposal. The Presidio Trust is MANDATED by NEPA (the National Environmental Policy Act) to involve the public through a participatory process before changing regulations such as these.

Thank you,

Carol K. Ames

**From:** [John Anderson](#)  
**To:** [Pelka, John](#)  
**Subject:** Proposed dog walking  
**Date:** Wednesday, January 23, 2013 10:20:20 PM

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Dear Mr. Pelka,

I am writing to express my objection to the proposal to allow professional dog walking in the Presidio. A single individual cannot reliably control as many as 8 dogs at a time, and where several people are attempting to do so, it becomes very difficult to assign accountability to any single one of them; for example, for picking up feces. Allowing professional dog walking will thus degrade the experience of the Presidio for visitors. In particular, it will make the Presidio less attractive for potential revenue-generating activities such as conferences. Dog walking should be restricted to conditions that allow firm control of the dogs, with no more than four per human.

Thanks you for your time.

Regards,  
John Anderson

**From:** [Carol Arnold](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walkers in the Presidio  
**Date:** Saturday, January 12, 2013 4:26:05 PM

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Dear Mr. Pelka,

I am writing in support of The Presidio Trust's proposal to allow dog walkers access to Area B of the Presidio. This is an excellent plan, one which reflects a balanced approach to managing lands within the Presidio. I commend the Trust's efforts in this regard and support this proposal wholeheartedly.

Thank you,

Carol Arnold



**From:** [karen\\_arnold](#)  
**To:** [Pelka, John](#)  
**Subject:** Comment against commercial dog walking  
**Date:** Wednesday, January 30, 2013 5:19:03 AM

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Attention:

John Pelka, The Presidio Trust  
103 Montgomery Street,  
P.O. Box 29052, San Francisco, CA 94129

Hi,

My Name is Karen Arnold and I would like to let you know that I'm **against** allowing commercial dog walking businesses to operate within Area B of the Presidio. This area is already heavily used by people who just want to enjoy the park and not have to worry about a gaggle of dogs tripping them at every turn. I am a resident of the McLaren Park area of San Francisco and there is a similar issue in this area, although I foresee an even greater problem in Area B, due to the popularity of this area, not only to SF residents, but to valuable tourist visitors, who contribute to our city's income, unlike the dog walkers, who only serve their own special interest. They often have more dogs than they can handle, and I'm often forced off the trail. This is in direct violation of the intended purpose of the natural areas, which is to provide a refuge for wildlife, while providing an opportunity for people to have quiet enjoyment of the area as well. Please say no to commercial enterprise infringing on our park system.

Thank you,  
Karen M. Arnold

**From:** [Poe Asher](#)  
**To:** [Pelka, John](#)  
**Subject:** pro dog walkers  
**Date:** Wednesday, January 30, 2013 3:55:26 PM

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Professional dog walkers have been using the Presidio for years with no adverse affects. I walk my dog in serveral areas of the Presidio on weekdays as well as weekends and have experienced no problems with traffic, crowds of dogs, or feces. Most of the dog walkers are respectful of the spaces they use.

The citizens of San Francisco to whom the dogs belong have a right to have their dogs exercised by a professional when they are not able to do so themselves. Their dogs should not have to be transported long distances for their exercise. We who live in this city need to be able to use areas within it. We are constantly threatened by GGNRA, which is surrounding the city. Now the Presidio wants in on restricting our recreation areas. Our dogs are part of our family. We, as taxpayers, have a right to recreate in public lands.

Poe Asher

**From:** [Poe Asher](#)  
**To:** [Pelka, John](#)  
**Subject:** commercial dog walkers  
**Date:** Wednesday, February 20, 2013 9:44:56 PM

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Pro dog walkers have used Presidio areas for years causing none of these foreseen problems. I am a native San Francisco resident. It appears that both the GGNRA and now the Presidio Trust is taking over most of the open space areas that we have always enjoyed. We are being forced into ever smaller spaces as these organizations prohibit access.

If I am unable to exercise my dogs due to schedule or health issues, I still want my dogs to be able to go out with a pro walker. Most of the pros are very aware that they and their client dogs need to mind their manners.

There are many other groups conducting fund-raising runs, etc. that very significantly impact the ability of others to access areas of the Presidio. It is often impossible to enjoy the Presidio on weekends given the traffic, crowds and blocked access for these events.

When Dr. Wayburn (I think that's his name), a member of the Presidio Board was alive I often saw him with his two dogs hiking with them off-leash in the Presidio. Had he been unable to walk with them himself I'll bet he would have been happy to have a pro walker take them out on those trails. Our dogs are part of our families and should be able to exercise in our city even if we are unable to go with them.  
Poe Asher

**From:** [Debbie Bagnulo](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogs  
**Date:** Sunday, February 24, 2013 11:51:46 AM

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Do not change a thing concerning the use of my park as a place to take my dog.

Sent from my iPhone

**From:** [Robert Bakewell](#)  
**To:** [Pelka, John](#)  
**Subject:** Comments re commercial dog walking in the Presidio Area B  
**Date:** Wednesday, January 30, 2013 10:19:23 PM

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Hello John Pelka,

As a citizen of San Francisco who lives in the Richmond District and enjoys the Presidio's multiple assets, including trails, beaches , natural areas, historic sites and glorious vistas AND as an active contributor to the stewardship of San Francisco's remaining ' open space ' assets thru my co-leadership of the SF Parks Alliance Park Partner ' Friends of Oak Woodlands Golden Gate Park ' , I offer the following comments.

Some members of our family have lived in San Francisco for the past 40 years , and during that time we have owned a dog during a period of 7 years.

My sister still owns a dog , but she now lives in a rural area of New Mexico.

I work in my office on Union Street in Cow Hollow and have watched the dog population seeming to grow exponentially during the past several years.

I have also been closely involved in the effort to restore, conserve and steward SF's remaining open space.

I am adamantly opposed to granting commercial dog walking permits for any open space areas within the perimeter of San Francisco County, including the Presidio.

I understand the pleasures and social advantages of having a pet canine , BUT I also understand, that for most people , this is an optional personal choice and , in some cases a luxury.

This City is densely populated, second only to NYC, and is blessed with multiple recreational, social and cultural assets.

Many of us choose to live here because of these assets and the proximity to well managed open space .. second to none in America.

We all know that funding for managing our precious and often fragile open space is limited and I do not think that catering to those who are paid take care of somebody's dog, should be ' subsidized ' by the Presidio Trust, the National Park Service or the GGNRA.

Dogs are not people and I do not think they have any intrinsic ' right ' to use our open space.

Domestic canines exact a toll.. urine, fecal smears and disposal, disturbing wildlife and natural habitat, and periodic invasion of privacy.

I take a hard line on this .. partly because of reasons explained above and partly because I do not want to see any more ' enabling ' of this dog ' extension of owner's ego ' obsession that is sweeping the City. Owning a dog in a densely populated City is a choice that deals significant consequences, the responsibility to mitigate these consequences is on the owner.

Sincerely yours,

Rob Bakewell



**From:** [Nancy](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walkers in the Presidio  
**Date:** Tuesday, February 19, 2013 11:23:26 AM

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Dear Sir or Madame,

I am totally in favor of the dog walkers having a permit but I would to propose a limit of four dogs,not eight. No matter how well-behaved the dogs are supposed to be,and I do question how that would be monitored, more than four dogs can appear very threatening and scary,both to other dogs and people.

I am a dog lover/owner and own Westies, I don't take them to the public places like Fort Funston because it is just too darn stressful.If there were an enforced limit of four,I could bring them and most people would be happier,too.I think.

Sincerely yours,

Nancy Berger

Sent from my iPad

**From:** [Barbara Bernhart](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walking  
**Date:** Tuesday, January 29, 2013 6:08:22 PM

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I am totally opposed to allowing dogwalkers into the Presidio. It would ruin the park in no time. It is a totally inappropriate use of a National Park. You only have to see what dogwalking has done to Fort Funston -- it looks like a devastated area.

Please keep the place for those of us who respect the natural environment and want it preserved for future generations.

Consider all the restoration work that has been contributed by countless volunteers. It would all be destroyed in a short time, if dogwalking would be introduced to the Presidio. What kind of message is this sending to those of us who volunteer in parks?

I am simply appalled by this proposal.

Barbara Bernhart

**From:** [Margaret Best](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walking  
**Date:** Saturday, January 12, 2013 4:49:31 PM

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Some national parks are different than others. Some people need to realize this. There is nothing wrong with allowing professional dog walking in urban national parks such as the Presidio, Fort Funston, Lands End, etc. As a female senior (with no dog of my own), I feel safe in parks that allow the presence of dogs. And if there were more places for pro dog walking maybe they could be spread out more and have less of the impact some people seem to be neurotically worried about. We live in a densely populated area, not a true wilderness. Please use some common sense and not let the crazies win on this one. Allow professional dog walking in the Presidio. Thank you for your attention.

**From:** [Pelka, John](#)  
**To:** [Pelka, John](#)  
**Subject:** FW: Dog walking  
**Date:** Friday, January 18, 2013 9:36:23 AM

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**From:** Mary Bickford [REDACTED]  
**Sent:** Friday, January 18, 2013 8:40 AM  
**To:** Presidio  
**Subject:** Dog walking

This commercial dog walking proposal is much needed and excellent!

Thank you for making it happen.

Mary LeeBickford

**From:** [Mary Bickford](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio  
**Date:** Friday, January 18, 2013 8:38:21 AM

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Thank you for protecting our parks! This is an excellent, overdue proposal.

Mary Lee Bickford

**From:** [Anjali Billa](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walking  
**Date:** Wednesday, February 13, 2013 10:30:45 PM

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Hi

I am a resident and I strongly oppose commercial dog walking permits in the Presidio. I love dogs but the area will be overrun with dogs and the dog walkers cars if you do this. Often times i see the dog walkers with no leashes on their dogs and as a runner i have more than once not been sure of whether a dog is going to bite me. My husband has had a dog charge at him and the mountain lake area where there a bunch of walkers often has dog poop. Lets not commercialize the Presidio any more than you already have.

I vote NO !

thanks  
anjali

**From:** [Karen Block](#)  
**To:** [Pelka, John](#)  
**Subject:** Opposition to proposed changes to Dog Walking rules in the Presidio  
**Date:** Wednesday, February 20, 2013 9:37:11 AM

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Hello John-

I am opposed to the proposed rules for dog walking in Area B because:

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. I absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.

Thank you for your consideration.

Karen Block  


**From:** [Ian B](#)  
**To:** [Pelka, John](#)  
**Subject:** comment re Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio  
**Date:** Wednesday, November 28, 2012 5:38:50 PM

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Dear Mr Pelka,

I have been a resident of Baker Beach neighborhood since late 2008. I regularly run throughout the Presidio during the day when commercial dog walkers are present in their largest numbers. I have not had any problems with the commercial dog walkers. They keep good control over their dogs, clean up after them, and if they see me approaching they gather their dogs close in. Because of this, I personally see no reason to limit the access of The Presidio to commercial dog walkers.

Two policy prescriptions I offer to reduce the negligible impact of commercial dog walkers on The Presidio are:

(a) Increase any dog-associated violations for dogs under the care of a commercial dog walker. Afterall, as professionals with more animals under their care, they should be held to a stricter standard than a private individual with one or two dogs; and,

(b) Require them to apply for a low-cost, easy-to-fill out license fee to prove they are licensed, bonded, and insured.

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All the Best,  
Ian Boisvert



**From:** [Terry Boom](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogs in the Presidio  
**Date:** Thursday, February 21, 2013 9:39:37 AM

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Dear Mr. Pelka,

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows dog owners to keep our dogs healthy and exercised during the week when we're at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

I absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.

I disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. The Trust cannot make statements like that without providing evidence to support them, and anecdotal evidence does not count.

In some cities, more people own dogs than have children yet dog play areas are coming under attack more and more and being restricted more and more. Please keep the Presidio dog-friendly.

Terry Boom

**From:** [Arnita Bowman](#)  
**To:** [Pelka, John](#)  
**Subject:** Support for commercial dog walking proposal  
**Date:** Friday, January 18, 2013 1:13:04 PM

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I live in San Bruno, CA and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,  
Arnita Bowman

**From:** [Arnita Bowman](#)  
**To:** [Pelka, John](#)  
**Subject:** Comment Suppressed  
**Date:** Monday, February 25, 2013 9:10:54 AM

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I subscribe to the Golden Gate Audubon Society Yahoo discussion group on conservation. I assume the Presidio Trust will receive many comments from extreme conservationists and native plant advocates - and those influenced by their post - and so I am sharing my perspective on their position (see below). Also below is the original post to the discussion group with their position.

I also want to highlight that the administrators of the discussion group seem to be suppressing comments and discussion that does not comply with their personal conservation ideology. My post below was suppressed, and I've heard from others that their comments were suppressed as well.

This public comment is an addition to the public comment I already sent supporting the proposed Presidio ruling for commercial dog walking and feces removal.

Regards,  
Arnita Bowman



### [My post to the discussion group that was suppressed and my perspective on their position:](#)

Everyone should read the [Federal Registry for the ruling](#) and look at the intent of the Presidio Trust ruling before commenting. Points to consider are:

- The [Presidio Trust](#) and the GGNRA lands are not Wilderness Areas. 8,000 people live, work, or attend school in the Presidio, preserving its character as a community. People with dogs are part of that community. The Presidio Trust's mission is to preserve the Presidio as an enduring resource for the American people. The [GGNRA's legislative mandate](#) is provide for the maintenance of needed recreational open space necessary to urban environment and planning.
- Commercial dog walkers provide a necessary service to people living in the Presidio neighborhoods and nearby areas and help dogs get the responsible and humane exercise and care necessary for healthy and well-behaved dogs, which benefits the residents and visitors to the Presidio. The Presidio is also a community with many other commercial businesses operating, as well as non-

profits providing services to individuals.

- Commercial dog walking is not a new activity to the Presidio and adopting this ruling in a timely manner would deter commercial dog walkers from concentrating dog walking in the Presidio, once the San Francisco regulation goes into effect. If the Presidio continues to allow unlimited dogs per person versus the 8 allowed by San Francisco regulations and doesn't require a license and insurance, commercial dog walkers will likely go out of their way to drive to the Presidio instead of using more local locations.

The dogs and their people aren't going away, aren't stuffed animals, and need open space. I applaud the Presidio Trust for attempting to implement balanced regulations that meets the needs of the community, visitors, and animals.

It is almost certain that more than 40% of environmentalists and people that love the parks have dogs, and it is a shame that extreme conservation dogma has so divided the environmental community and alienates so many.

#### Message to the Golden Gate Audubon Society Conservation Yahoo Group:

From: Matthew Zlatunich [REDACTED]

Sent: Tue, February 19, 2013 1:58:16 PM

Subject: [GGASConservation] Presidio Commercial Dog Walking

**\*\* Last Call To Comment! \*\***

**Say No! to Commercial Exploitation of our National Parklands**

The deadline to oppose the proposal that would permit commercial dog walking businesses to operate within Area B of the Presidio is February 25th, 2013.

Use of the Presidio by the commercial dog walking industry constitutes an exploitation of park lands strictly for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience.

Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will adversely impact park resources and values, and will serve only private

enterprise at the expense of the American public.

Say No! Speak up now and tell the Presidio Trust that commercial dog walking is not an appropriate use of our National Park lands. Comments are due by February 25, 2013 and can be submitted electronically to [jpelka@presidiotrust.gov](mailto:jpelka@presidiotrust.gov)

Or mail comments to: John Pelka, The Presidio Trust,  
103 Montgomery Street,  
P.O. Box 29052,  
San Francisco, CA 94129.

**From:** [Betty Bozio](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walking in the Presidio Trust  
**Date:** Friday, January 18, 2013 6:31:50 PM

---

I live in *San Francisco* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards, Elizabeth Bozio



Betty



**From:** [Jennifer Bradley](#)  
**To:** [Pelka, John](#)  
**Subject:** Responsible Dog Walking in the Presidio  
**Date:** Thursday, February 21, 2013 8:38:14 AM

---

Dear Mr. Pelka:

San Francisco Bay area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

Dog walkers frequent areas within parks that many other park users do not, providing a general presence and unspoken surveillance for the Park Service and general public that help keep parks safe for the general public.

When we are at work, because we are responsible dog owners, we depend on commercial dog walking - which has been going on for decades- to keep our dogs healthy, exercised, socialized, and consequently well mannered. There are plenty of other commercial companies doing business in the Presidio that have a much greater permanent impact on the park : Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, The House Of Air, Disney Film Center- to name just a few.

**We absolutely oppose the part of the proposed rule that says that the Presidio Trust can change The City of San Francisco's Ordinance ( Commercial Dog Walking Permit) at any time in the future, and without further public comment, any part of the Commercial dog walker regulations in the currant proposal.**

Respectfully,

Jennifer Bradley

**From:** [Trish Bransten](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogs  
**Date:** Thursday, February 21, 2013 12:28:49 PM

---

Dear John Pelka,

I sincerely hope that you can see your way clear to allowing dog owners to continue to happily stroll through the Presidio and other places in the ggnra off leash.

I am happy to pay a dog owners license fee for the privilege.

Best,

Trish Bransten

[Redacted signature block]

RENAE R. BREITENSTEIN



The Presidio Trust  
Attn John Pelka,  
103 Montgomery Street  
San Francisco, CA 94129

Dear Mr. Pelka,

I travel from the East Bay to volunteer and enjoy the Presidio. That said, I have a vested interest in preserving the park resources and keeping it safe and friendly for all visitors. I am writing because of my concerns and opposition to the Presidio Trust proposed Public Use Limit on Commercial Dog Walking.

It is known that illicit commercial dog walking activity within the Presidio has been responsible for damage to the environment, threats to public and visitor conflict. If adopted, the Presidio Trusts proposal will result in an increase in commercial dog walking and its inherent negative impact on the Park. Sanctioning the activity and opening the park to more commercial dog walking is not a reasonable, suitable, or logical remedy to the identified problems. Better enforcement of the current regulations, including 36 CFR 1005.3, 1005.6, and 1005.13 will keep illicit commercial dog walking in check, protect the Park environment, ensure public safety, reduce visitor conflict and uphold National Park values.

Commercial dog walking is not an appropriate activity for our National Park lands. Commercial dog walking does not provide a service or benefit to park visitors. Park visitors, especially those with young children, will stay off trails and other areas of the park. Allowing commercial dog walking will only serve for the capital gain of private enterprises at the expense of the American public.

Thank you.

With sincere concern for the Presidio,

A handwritten signature in cursive script that reads "Renae R. Breitenstein".

Renae R. Breitenstein

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**From:** zoie nicholas [REDACTED]  
**Sent:** Thursday, February 21, 2013 10:57 AM  
**To:** Pelka, John  
**Subject:** I support the continued ability of dog walkers and do not oppress dog owners/walkers

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, all the bike companies that rent out bikes that threaten pedestrians and dog walkers, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.
4. We disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. The Trust cannot make statements like that without providing evidence to support them, and anecdotal evidence does not count.

Judith Brown

[REDACTED]

[REDACTED]

**From:** [Tish Brown](#)  
**To:** [Pelka, John](#)  
**Subject:** No  
**Date:** Sunday, January 13, 2013 7:19:58 AM

---

Please no commercial dog walking in the Presidio. It would degrade the environment.

Tish Brown  


**From:** [Tish Brown](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walking in Presidio  
**Date:** Tuesday, February 05, 2013 6:53:16 AM

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What a terrible idea. Please ban it!

Tish Brown



**From:** [Amanda Bryan](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking in Presidio  
**Date:** Thursday, February 21, 2013 5:53:38 PM

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Dear Sir,

Please do not take away or severely restrict dog walking in the Presidio. It means a lot to me to recreate with my dog near my house and let him run free. It is essential in fact that my dog gets lots of exercise in order to be happy and healthy and it's great socialization for him to play freely with other dogs. I've been enjoying this activity for a decade and dogs have been a big part of the Presidio for many generations. It would be very sad to change anything about the long standing current policy. For me, it is heaven on earth!

Thank you so much,  
Amanda Bryan

Sent from my iPhone

**From:** [Ursula Bussfeld](#)  
**To:** [Pelka, John](#)  
**Subject:** Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio  
**Date:** Friday, February 08, 2013 3:00:57 PM

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I fully support the proposal to limit commercial dog walking in area B.

With best regards

Ursula Bussfeld

[Redacted signature block]

**From:** [Paul Buxbaum](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking in the Presidio  
**Date:** Thursday, February 21, 2013 9:40:39 AM

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San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

**From:** [Ingrid Cabada](#)  
**To:** [Pelka, John](#)  
**Subject:** commercial dog walking  
**Date:** Tuesday, January 22, 2013 4:53:03 PM

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To John Pelka,

Please do not allow commercial dog walking in the Presidio or any other site in the GGNRA. If you want to see the result of this destructive activity just visit Fort Funston.

Sincerely  
Ingrid Cabada

**From:** [Sally Cancelmo](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking in the Presidio  
**Date:** Thursday, February 21, 2013 10:06:07 AM

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Dear Mr. Pelka,

I am a professional dog walker who has been serving San Francisco clients, walking their dogs in the Presidio and at Crissy Field since 1990. I held a Permit from the GGRNA in 1995 and 1996.

I support the City and GGNRA walking permits but strongly protest the part of the proposed rule that allows the Presidio Trust to change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

This is clearly not fairness under law. The Trust has created confusion in the past by not maintaining the same regulations applicable to other areas of the Park. By proposing to change the rules after the fact, at your whim without public input, you sow suspicion and distrust. These regulations should be made and held to in good faith.

Thank you.

Sincerely,

Sally Cancelmo  
dba Sally Running Dog

**From:** [Chris Carlsson](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking  
**Date:** Thursday, January 17, 2013 11:25:40 PM

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I am 100% opposed to allowing commercial dog walkers use public lands. I am completely aggravated by walking around various open spaces and public parks in San Francisco and coming up on dozens of dogs being "managed" by a commercial dogwalker... I don't want to be around dogs, period. I don't see why when I go to public parks I should have to endure the abusive use of the space by someone who is carrying out a private business on public lands.

Please rescind any plans for allowing this inappropriate and deeply offensive use of public land.

Thank you.

--Chris Carlsson

<http://www.nowtopians.com/public-space/not-a-dog-person>

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<http://www.chriscarlsson.com>

Shaping San Francisco, Tours and Talks: <http://www.shapingsf.org>

Shaping San Francisco's digital archive is at <http://FoundSF.org>.

The Nowtopian (my blog): <http://www.nowtopians.com>

**From:** [Janet Carpinelli](#)  
**To:** [Pelka, John](#)  
**Subject:** no commercial dog walking in Presidio!  
**Date:** Wednesday, February 20, 2013 5:41:32 PM

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To: John Pelka, The Presidio Trust

I do not support commercial dog walking in the Presidio. I live near Esprit Park (SF park) which is overrun with dogs in general and is used much too heavily by commercial dog walkers who arrive in vans and let 6 dogs out at a time, often off-leash even though it is not an off-leash park. Do not go there!!!!

Use of the Presidio by the commercial dog walking industry constitutes an exploitation of park lands strictly for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience. Dogs chase birds, children and other dogs and are often not under voice control or leashed despite any rules that exist.

Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will adversely impact park resources and values, and will serve only private enterprise at the expense of the American public.

And I am the owner of an energetic 45 lb. dog.

Thank you,

Janet Carpinelli



**From:** [Jim Carroll](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio Dog Walking  
**Date:** Wednesday, February 20, 2013 4:26:56 PM

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Dear Mr. Pelka,

I wanted to share my support of the Presidio adopting the SF dog walking norm of 8 dogs per commercial dog walker. This seems very sensible.

I love taking my Labrador Retriever, Blaze, for walks and I wanted to assure you that he does no harm to the environment on his walks. I always pick up after him and he never leaves any trash behind like so many people do unfortunately.

I hope that the final regulations don't include any unsupported accusations about dogs and the environment.

I hope this email finds you well and I thank you for reading my email.

Best,

Jim Carroll

**From:** [Jessica Chase](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking  
**Date:** Thursday, February 21, 2013 10:43:36 AM

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Hello,

I just wanted to join in and voice my concern with the commercial dog walking permits.

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking Permit regulations contained in the proposal at any time in the future, and without further public comment.

Thanks,  
Jessica

**From:** [Charles Chavez](#)  
**To:** [Pelka, John](#)  
**Subject:** Please SaveOffLeash - SF Bay Area  
**Date:** Saturday, January 19, 2013 8:48:17 AM

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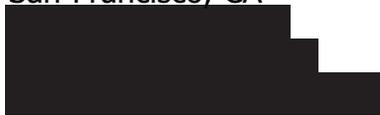
Hello Good morning -

I live in *San Francisco* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Charles R Chavez  
Transportation Coordinator  
Guide Service  
Spanish & English  
San Francisco, CA



**From:** [Karen Cleek](#)  
**To:** [Pelka, John](#)  
**Subject:** Professional Dog Walking Proposal for the Presidio  
**Date:** Saturday, January 12, 2013 11:51:14 AM

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I have heard that there is a proposal to allow professional dog walkers with up-to-8 dogs use the Presidio's Area B.

First off, no dog walker should be allowed to walk 8 dogs at a time anywhere. It is impossible to control them or ensure their safety.

Second, professional dog walkers are going to interrupt the use of the area by visitors whether they are with or without their own dogs. The Presidio isn't a dog park. If you want to set aside a dog park in the Presidio, that is worth considering. Although commercial use of a dog park would probably discourage individuals from using it for their dogs.

I have a dog, I live on the outskirts of the Presidio, am a member of the Presidio Y and also have my PO Box at the post office there. For 2+ years I served on the RAB. I am at the Presidio several times a week. I love the Presidio and have always tried to balance the needs of the park vs the needs of financially supporting the park.

Don't allow professional dog walkers to over-run this beautiful space.

Karen Cleek



**From:** [Kathryn Coffey](#)  
**To:** [Pelka, John](#)  
**Subject:** Comment on Presidio Trust rules for Commercial Dog walking  
**Date:** Thursday, February 21, 2013 4:17:12 PM

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Dear Mr. Pelka -

I am writing to share with you my support of and concerns about the new rules for commercial dog walking in the Presidio. I live in a condo in Presidio Heights, have financially supported the Presidio and enjoy the Presidio for walking my dog on a daily basis. I do not have a backyard. My dog is part of two groups that both visit the Presidio trails Monday-Friday. I also patronize many of the businesses in the Presidio that have contributed to the success of the Presidio in its efforts to be self-sustaining.

The Presidio is a recreational space enjoyed by all San Francisco residents. Dog families (people, dogs and people with their dogs) in the Bay Area have enjoyed the Presidio for generations. This is a huge contributor to our quality of life and one of the reasons that we decided to live in San Francisco.

I enthusiastically support the continued use of commercial dog walking in the Presidio. In fact, I love seeing the groups of dogs playing in the Presidio. The groups are full of joy and fun, and make the Presidio a safer place. My dog walkers permit me to go to work every day since I moved to San Francisco in 1994. It allows me to keep our dogs healthy and exercised. I have also formed friendships and social connections because of the dog walking community around the Presidio. I would move out of the city if quality dog walking was not available. I note that there are lots of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.). There is every reason to continue to allow dog walkers access to the Presidio and its often empty trails.

I am however in strong opposition to the part of the proposed rule that allows the Presidio Trust to change any part of the commercial dog walker regulations in the current proposal without public notice or comment. This would allow the Presidio Trust management to operate behind closed doors and be influenced by personal and special interest group agendas.

For me, the Presidio is a special place BECAUSE I can enjoy it with my dog and because my dog can enjoy it with her dog walkers. It is close to my home and safe for the dogs and the dog walkers. Any changes to my ability to rely on the Presidio as source of recreation for my dog and me, whether on our weekend walks or on commercial dog walker walks would meaningfully change our quality of life. I would certainly expect the Presidio Trust to run an open and thoughtful process to any rule changes and to carefully consider comments from the public.

Thank you,

Kathy Coffey

**From:** [Karl Cohen](#)  
**To:** [Pelka, John](#)  
**Subject:** I support the right for dog walkers to use he park  
**Date:** Wednesday, February 20, 2013 12:11:29 AM

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Until a stroke ended my walking my lab in the Presidio I went there almost daily. I made several friends there including enjoying walking with a few commercial dog walkers. They were a very nice polite group who picked up after their wards and kept them under control,

The Presidio was a lovely place to take a dog while Ocean Beach and a few other locations I tried attracted a wide variety of individuals with some being jerks with pit bulls, etc. that were sometimes out of control and possibly dangerous. I never had or was aware of any problems in the Presidio.



**From:** [Bill C](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walking  
**Date:** Sunday, January 20, 2013 8:32:40 PM

---

Dear Mr. Pelka:

If people are allowed to walk packs of dogs in the Presidio, who will collect the dog poop from walkways?

Can individuals really manage to walk as many as 8 dogs at a time? Sometimes, people walking even one dog fail to pull the dog to them to allow someone to pass by.

It seems to me that allowing so many dogs at once is far more dogs that a walker can properly manage.

Cordially,

Bill Collins

**From:** [Rebecca Coolidge](#)  
**To:** [Pelka, John](#)  
**Subject:** I support dog walkers  
**Date:** Friday, January 18, 2013 1:48:13 PM

---

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Rebecca Coolidge

**From:** [Bernard Corace](#)  
**To:** [Pelka, John](#)  
**Subject:** Proposed Commercial Dog Walking in the Presidio  
**Date:** Tuesday, February 19, 2013 2:43:01 PM

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.Hello John Pelka,

I am writing in opposition to proposed commercial dog walking in the Presidio.

I feel use of the Presidio by the commercial dog walking industry constitutes an exploitation of park lands strictly for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience

Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will adversely impact park resources and values, and will serve only private enterprise at the expense of the American public.

Please register my opposition and I hope this proposition will not become a reality.

Sincerely-Bernie Corace

A black rectangular redaction box covering the signature area.

**From:** [Barbara Corff](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walking in the Presidio  
**Date:** Sunday, January 13, 2013 12:12:37 PM

---

Dear Mr. Pelka,

As a long time passionate park supporter and neighbor I have been dedicated to preserving park resources and upholding National Park values. I am writing to offer my comments in opposition to the Presidio Trusts proposed Public Use Limit on Commercial Dog Walking.

I understand your efforts to regulate this activity, but this result is completely unacceptable and does not "Limit" commercial Dog Walking. The number of dogs walked has steadily been rising over the years, and to even suggest that more than 3 dogs as reasonable is ridiculous. There are going to be more and more visitors to our parks in years to come. Our trails are now world class, so let's be the leaders that we are expected to be and bravely state that we prefer our trails to be enjoyed by people from around the world. Think globally - treat our Presidio as the treasure it truly is. If your intent is to regulate and "Limit", then do that.

Regardless of whether you are a dog lover or not, our park is not to be used as the most convenient last resort for dog walkers. Our city has grown to the point that there are no longer the traditional dog walkers 'empty weed lots'. The pressure on our parks has come to a boil. Dog ownership has been promoted at a fever pitch and we live in a city whose government and lack of enforcement have created a poor example. However, our Presidio has been in existence for hundreds of years, and I do expect it to outlive this trend. Please do your planning with the future in mind. Do not cave in to this highly organized minority.

My experience as an interpretive docent for the NPS in an area that has been a dog walking favorite has been one of extreme frustration. I have personally witnessed the abuse of our natural resources, including our treasured El Polin Spring, careless/clueless disregard, the disruption of tours, and confrontations with verbally abusive dog walkers. The park is where I go for serenity, and where I have tried to share its beauty, natural and cultural value with visitors for the past 12 years. It is impossible to find serenity when I hear people yelling, yelling, and yelling at their dogs. It is impossible when I have to disrupt my tour to let a pack of 6 dogs pass on a trail. It is impossible when all 6 dogs are off leash and jumping on my elder tour participants, or running into the newly planted and protected areas that I am pointing out as a place where stewards have been carefully tending rare species.

I know I am not the only one who feels this way, but I sincerely hope that you will consider the larger concept in this matter. Do not just tally your votes by counting the number of responses by organized dog groups who will no doubt respond to this in volume. Who is going to be the voice for our park's best future?

Illicit commercial dog walking activity within the Presidio has been responsible for damage to resources, threats to public safety, and visitor conflict. If adopted, the Presidio Trusts proposal will result in the continuance of commercial dog walking and its inherent adverse impacts. To sanction this activity and open the park up to commercial dog walking is not a reasonable, suitable, or logical remedy to the identified problems. Rather, enforcement of the current regulations, including 36 CFR 1005.3, 1005.6, and 1005.13, will keep illicit commercial dog walking in check, protect resources, ensure public safety, reduce visitor conflict, and uphold National Park values.

My thoughts on enforcement: Officers are needed **on trails**. Park visitors come first! Park visitors need to feel **empowered**: Post signs with a hotline number which people can call when there is a problem. We live in the age of cell/smart phones: Develop a better way to monitor dog activity in the park. Visitors could upload their photos or videos via an app and a scan-able code on signs posted throughout the park. The idea is to make a safer park that is self-

policing, where dog walkers will know that other visitors will be monitoring and reporting their actions. The current attitude is a dismissive “As long as there is no officer in sight, I can carry on as I please”.

Commercial dog walking is not an appropriate activity for our National Park lands. Commercial dog walking will adversely impact public safety, environmental and scenic values, natural and cultural resources, and the avoidance of conflict among visitor use activities. ***Commercial dog walking will provide no service or benefit to any park users and will serve only for the capital gain of private enterprises at the expense of the American public, our Park’s future, and our visitors from around the globe.***

Most sincerely,

Barbara Corff

**From:** [David Crain](#)  
**To:** [Pelka, John](#)  
**Subject:** professional dog walking in the Presidio  
**Date:** Saturday, January 19, 2013 1:36:23 PM

---

I live in *Pacifica, CA* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

David Crain

**From:** [John Delaplane](#)  
**To:** [Pelka, John](#)  
**Subject:** support for professional dog walking  
**Date:** Friday, January 18, 2013 1:45:32 PM

---

Greetings,

I live in *San Francisco* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Sincerely,

John Delaplane



**From:** [Lucky Pawz Pet Service ~ Glynis](#)  
**To:** [Pelka, John](#)  
**Subject:** Off leash dog walking  
**Date:** Thursday, February 21, 2013 9:23:05 AM

---

Hello John!

I just wanted to drop you a line to plead to keep the wonderful tradition of off leash walking in the Presidio.

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment. This just doesn't seem fair.

Please help our dogs stay active, engaged and happy!!

Thank you!

[Glynis Dewing](#)  
[Lucky Pawz Pet Services](#)



["Like Us"](#) on Facebook for a monthly drawing for a FREE walk!

**From:** [Charlie Dicke](#)  
**To:** [Pelka, John](#)  
**Subject:** Public Use Limit on Commercial Dog Walking.  
**Date:** Monday, February 25, 2013 3:01:56 PM

---

Dear Mr. Pelka,

I support the requirement for commercial dog walkers to have the same Commercial Dog Walking Permit as the City of SF requires. I just want to be sure that any further restrictions would not take place without public comment as required by NEPA.

Sincerely,

Charlie Dicke

Charlie Dicke  


**Confidentiality note:**

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**From:** [Leslie Dicke](#)  
**To:** [Pelka, John](#)  
**Subject:** Concerns about New Dog Walking Rules  
**Date:** Monday, February 25, 2013 2:44:30 PM

---

Dear Mr. Pelka,

We are extremely concerned about the Presidio Trust's proposal for new dog walking rules for the following reasons:

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. What we **DON'T SUPPORT** is the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, or change, without public comment, any part of the commercial dog walker regulations in the current proposal. The Presidio Trust is **MANDATED** by NEPA (the National Environmental Policy Act) to involve the public through a participatory process before changing regulations such as these.

Thank you for your time and commitment to maintaining these parks for all forever!

Sincerely,  
Leslie Dicke



December 24, 2012

John Pelka, The Presidio Trust  
103 Montgomery Street  
PO Box 29052  
San Francisco, CA 94129

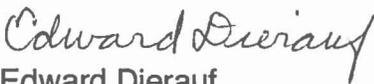
Dear Mr. Pelka,

Here is a suggestion for resolving the controversy over commercial dog walking in the Presidio.

Issue a CONTROLLED number of permits to commercially walk dogs. Commercial dog walkers pay a fee for the permit which specifies conditions for using GGNRA public property.

I have been volunteering at the Presidio Native Plant Nursery for the past ten years.

Yours very truly,

  
Edward Dierauf



**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** commercial dog walkers  
**Date:** Wednesday, January 30, 2013 9:04:50 AM

---

I sometimes go off the beaten path when walking in the Presidio and have some bad experiences when encountering the dog walkers who have way too many dogs to keep under control. I have yet to see any way for a dog walker to keep dogs away from walkers. I feel that they should be restricted to only 4 dogs at any location and not abuse the Presidio for their financial gains.

Ann Dolyniuk  
[REDACTED]

**From:** [Mary Dougherty](#)  
**To:** [Pelka, John](#)  
**Cc:** [REDACTED]  
**Subject:** Comment on Professional Dog Walking in the Presidio  
**Date:** Monday, February 25, 2013 10:25:10 AM

---

Dear Mr. Pelka:

As a long time resident of San Francisco, a dog owner, and a member of SFDOG, I am writing to express my concerns regarding the proposed changes to access to the Presidio.

Please note:

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and we want to continue to enjoy recreating with our dogs in the Presidio. *It is imperative that The Trust designate areas for off-leash dog walking within its land.*

2. I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

3. I absolutely oppose the idea that the Presidio Trust can change the Commercial Dog Walker permit regulations contained in the proposal at any time in the future without having to take additional public comment. **The requirement for a public comment period should be explicitly included in the final version of the proposal where it states that the Trust can revise the regulations should they decide changes are appropriate.** Because the provision for public comment was not explicitly stated, an argument could be made that the proposal, as written, gives the Presidio Trust the ability to change the regulations without further public comment.

4. I disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment. The Trust cannot make statements like that without providing evidence to support them, and anecdotal evidence does not count.

Sincerely,

Mary Dougherty

**From:** [Joan Downey](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking  
**Date:** Thursday, December 06, 2012 10:46:13 PM

---

I'm pleased to hear that you'll regulate dog walkers in the Presidio. It's long overdue. I hope that one of the conditions is that every dog is licensed.

Joan Downey



**From:** [Joan Downey](#)  
**To:** [Pelka, John](#)  
**Subject:** NO Commercial Dog Walkers in the Presidio  
**Date:** Saturday, January 12, 2013 6:51:41 PM

---

Dear Mr. Pelka,

Please vote to keep commercial dog walking out of the Presidio.

Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Thank you for your consideration.

Joan Downey

[REDACTED]  
[REDACTED]

**From:** [Richard Drechsler](#)  
**To:** [Pelka, John](#)  
**Subject:** Public Comment on "Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio"  
**Date:** Monday, February 25, 2013 8:02:06 PM

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Note: This mail below was originally delivered 2/25/2013 at 4:42 pm but was undeliverable at jpelka@presidiotrust.gov

----- Forwarded Message -----

From: Richard Drechsler <r\_drechsler@yahoo.com>  
To: jpelka@presidiotrust.gov  
Sent: Mon, February 25, 2013 4:42:42 PM  
Subject: Public Comment on "Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio"

Dear Mr. Pelka,

I support your proposal for regulations on commercial dog walking in the presidio that are consistent with that of the City of San Francisco.

Dog walkers serve as proxies for owners who can't be with their dogs during the day yet are willing to pay others to maintain their dogs physical and mental health. Their owners would otherwise be with them in the Presidio.

I am a bird watcher and nature guide, not a dog owner, and believe that this rule will be good for the park, its visitors and its many users.

These requirements will standardize dog walking practices and provide better and safer services for dog owners and dogs living in the Presidio and adjacent city neighborhoods.

Training and licensing will make dog walkers more sensitive to their natural surroundings. Hopefully the training they receive will turn "dog walking" into a profession whose practitioners will continually hone their sensitivity, skill and knowledge.

According to "The Trust for Public Land" the Presidio is the largest park in San Francisco. I approve of this effort to meter its resources, yet make them available to all.

Sincerely,

Richard Drechsler

A large black rectangular redaction box covering the signature area.

**From:** [Dumbacher, Jack](#)  
**To:** [Pelka, John](#)  
**Subject:** No to commercial dog walking in the Presidio  
**Date:** Wednesday, December 05, 2012 10:09:16 PM

---

5 DECEMBER 2012

John Pelka, The Presidio Trust  
103 Montgomery Street  
P.O. Box 29052  
San Francisco, CA 94129

Dear Mr. Pelka:

I am concerned about the practice of commercial dog walking that is taking place in National Park Lands, especially on the Presidio lands. While I am not opposed to dog walking in general when private dogs are kept on leash, the commercial enterprises are capable of bringing thousands of dogs into city parks in uncontrolled and poorly managed ways.

- In large numbers, dogs have significant environmental impacts. Dogs, especially off trails, will dig and can cause erosion. This is a serious issue in the Presidio, even without dog walking. Commercial dog walkers do not regularly pick up all dog feces, and urine can kill plants.

- Commercial dog walkers often walk more dogs than they can safely manage, potentially threatening natural resources and even other citizens and dogs legally using the park.

- Commercial dog walking is not an appropriate or legitimate use of our National Parks. Other commercial uses of parks are permitted or managed, and this particular use, with significant dangers and threats, should be stopped. Current rule 36 CFR 5.3 prohibits any business in the park, except in accordance with a permit.

- Enforcement should be done to ensure that commercial dog walking is not done in the Presidio. This is currently an illegal practice, and should be discouraged and enforced. Law enforcement costs can be offset by fines.

- Currently, there is no portion of the park that is zoned for any kind of dog walking. This means that dog walkers are potentially using the entire park, including some sensitive bird areas and areas with native small mammals and rare plants. There should be designated non-sensitive areas that can be safely used by dog walkers.

If ANY commercial dog walking is allowed in the park, there must be:

1. areas set aside for dog walking in non-sensitive areas, to prevent damage to important resources and wildlife,
2. revenues from the enterprises that must be returned to the parks (possibly in the form of fees for permits) to help offset costs of damage repairs and management,

3. limits must be placed on commercial dog walkers to prevent unsafe practices, and damage to historic, scenic, cultural, and recreational resources reserved for public use and enjoyment.

As a professional ornithologist working at the California Academy of Sciences, I have noticed significant declines in bird species in city park areas, that directly correlate with increased dog walking. In other parks, there have also been declines in small mammals as dog numbers have increased. These practices must be managed carefully and thoroughly considered, or our parks will be permanently damaged. Part of the great value and attraction to living in San Francisco is our beautiful natural areas. But over the years, and little by little, these natural areas are becoming less natural. Over the course of our lifetimes (or your career as a steward of the Presidio) we are seeing significant losses that permanently damage and erode these natural gems.

Please consider steps to prevent damage by commercial dog walkers.

Sincerely,

John P. Dumbacher, PhD  
Ornithologist

[Redacted signature block]

**From:** [Joy Durighello](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogwalking in GGNRA  
**Date:** Wednesday, February 20, 2013 11:57:33 AM

---

Commercial dog walking should have no place on national park lands. It degrades the environment and does not contribute to the park experience for other visitors. Please ban this activity from all parts of the GGNRA.

Thank you.

Joy Durighello  
(park visitor and park volunteer since 1994)

*Lewis Ellingham*



December 21, 2012

Mr. John Pelka,  
The Presidio Trust,  
103 Montgomery Street  
P.O. Box 29052,  
San Francisco, CA 94129

**Subject: Commercial Dog Walking in the Presidio**

Mr. John Pelka,

I have watched Fort Funston be ruined for any other users than dog walkers over the years. My birder hobby, my recreational walks there, which once were daily, ceased several years ago after a series of antagonistic encounters with dog walkers at every level physically of the GGNRA terrain.

Encounters throughout The Presidio have been similar, especially at the beach at Crissy Field (the snowy plover reserve), the lagoon area and El Polin Springs, rising toward the golf course. Dog walkers seem entirely unaware, or choose to be, that these spaces are not San Francisco public parks where they can do what they please, without risk of penalty. Many are very hostile to the notion that another citizen might even think of commenting on behaviors that are not *now* legal. Commercial dog walkers are, I would say, consistently the worst offenders, and often the most hostile. I have all but quit using these locations not only to pursue my birding hobby, but to go to The Presidio at all. A nasty flavor.

**Commercial Dog Walking in the Presidio should Never Happen. Instead, restriction should be the policy, and volunteers as well as rangers should actively enforce ANY violations. Above all, clear, proactive postings should always demarcate problem areas, so that everyone knows the rules. And these rules would NEVER allow the abusive practice of commercial dog walking anywhere in the park.**

Sincerely,

Lewis Ellingham  
(58 year resident)

**From:** [dave415](#)  
**To:** [Pelka, John](#)  
**Subject:** Keep dog walking recreation in The Presidio  
**Date:** Thursday, February 21, 2013 9:28:58 AM

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Dear Mr. Pelka:

I support your plan to keep dog walking a recreation activity in The Presidio. There is no justification for removing the activity. Those of us who work during the day rely on commercial dog walkers to keep our dogs healthy with exercise. There are plenty of commercial companies and endeavors doing business in The Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.). I urge you to remove the proposed rule that says The Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment. That is wrong. This is public land and the people have a right to weigh in always on usage decisions. I also disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. Statements like these have no credibility without providing evidence to support them, and anecdotal evidence cuts both ways but that is not appropriate for a environmental review. Thank you for you consideration. I would like to hear back from you on the two points of concern that I have with the plan as stated here.

Sincerely,  
Dave Emanuel



**From:** [Alison Engel](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking inthe Presidio  
**Date:** Monday, February 25, 2013 2:22:46 PM

---

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. What we **DON'T SUPPORT** is the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, or change, without public comment, any part of the commercial dog walker regulations in the current proposal. The Presido Trust is **MANDATED** by NEPA (the National Environmental Policy Act) to involve the public through a participatory process before changing regulations such as these.

Alison Engel



**From:** [Christopher Faust](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walkers  
**Date:** Wednesday, January 30, 2013 5:11:26 PM

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Dear John,

I share your concern for the natural beauty of the Presidio and recreational access for all. I especially am concerned when our public spaces are monopolized by a few. However, we have to be careful. Dog walkers are charged with exercising the dogs of San Francisco citizens who are also tax payers. These citizen dog owners have the right to use local open space and would walk their dogs themselves if they had the time. By hiring professionals, they greatly reduce the number of vehicles that use the roadways and park. Thus, professional dog walkers ought to be preferred.

Dog walkers are much like nannies or day care professionals. They serve in lieu of the parent/guardian. It would be absurd to limit the number of children who use the Presidio just because they are being brought in large groups by their nannies or babysitters.

Dogs need exercise. Studies have shown that San Francisco has a much lower incidence of dog bites per capita than other places in California. This is likely attributable to the large number of parks and public open spaces where dogs can mingle and become socialized and get physical and mental exercise they need to be calm animals.

Many many San Franciscans get their principle exercise from walking their dogs. Without the dog, they would not justify spending so much time walking briskly instead of lying on the couch. In addition, dogs build community. People with dogs spend more time chatting with their neighbors and others they meet on the street. Whether one has a dog or not, the dog acts as a catalyst and icebreaker. So, let's nurture this relationship and find ways that the park professionals might facilitate dog walking in ways that reduce impact on the landscape. For children, we build playgrounds. Why not a Presidio dog park?

Sincerely,

P. Christopher Faust



Say No! to Commercial Exploitation of our National Parklands

SAN FRANCISCO - The Presidio Trust has EXTENDED THE COMMENT DEADLINE for its proposal to permit commercial dog walking businesses to operate within Area B of the Presidio. The new comment deadline is February 25th, 2013.

Under this proposal, it is estimated that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon. Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking areas, and walkers with eight dogs each will ply the public trails and open spaces.

Use of the Presidio by the commercial dog walking industry constitutes an

exploitation of park lands for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience.

Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will impair park resources, and will serve only private enterprise at the expense of the American public.

Say No! Speak up now and tell the Presidio Trust that commercial dog walking is not an appropriate use of our National Park lands. Comments are due by February 25, 2013 and can be submitted electronically to <<mailto:jpelka@presidiotrust.gov>>jpelka@presidiotrust.gov

Or mail comments to: John Pelka, The Presidio Trust  
103 Montgomery Street,  
P.O. Box 29052, San Francisco, CA 94129.

**From:** [Beth Feingold](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogs in the Presidio  
**Date:** Thursday, February 21, 2013 9:39:21 AM

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Please reconsider some of the provisions of the proposals - for example, change without public notification, which does not seem right. And I would like to know about 'damage' to land caused by dogs that is worse than that caused by humans. There are now many businesses, attracting many people, in the Presidio. It is such a beautiful and special place, an opportunity for people and their pets to enjoy the outdoors together.

Thank you,

Beth Feingold

December 16, 2012

John Pelka  
 The Presidio Trust  
 103-Montgomery Street  
 San Francisco, Ca, 94129



Dear Mr. Pelka,

I recently overheard a comment that suggests the Presidio has become our local dog park. Walking and exploring along the beautiful, but fragile, paths & trails have certainly confirmed this.

It seems our Serrano Park is the only one where dog walking & off leash activity is endorsed & will possibly be expanded.

For individual safety & landscape protection, as a Park volunteer, I oppose dog activity allowed now & any future expansion of such commercialism.

Sincerely, Diane Filbert

16 December 2012

John Peeka  
 103 Mont gomery street  
 P.O. Box 29052  
 San Francisco, Ca 94129



Frederic J. Silke, Esq. 12/15/12

Dear Mr. Peeka,

As a five year Presidio volunteer I continue to observe the disregard of current Presidio regulations by commercial dog walkers and dog owners. This results in threats to public safety, damage to natural resources and reductions in National Parks values.

Commercial dog walking provides no service or benefit to Park users and has not been legally permitted on any of our Parks land.

If adopted the Presidio Trust proposal will result in an increase

of commercial dog walking with increased negative impacts.

Enforcement of current regulations will control dog walking, protect natural resources, ensure public safety and hold to National Park values.

Please, keep commercial dog walking out of our National Park.

Sincerely

Freda J. Gilbert

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walkers MUST be banned from our parks  
**Date:** Wednesday, February 20, 2013 7:31:49 PM

---

Mr. Pelka:

National parks/recreation areas/monuments are for the preservation and enjoyment of natural systems by the people of the U.S.. What do commercial dog walkers have to do with this? Nothing. That is, nothing but detraction and destruction.

Why are Southern California beaches strictly protected while those in and around San Francisco are daily degraded by not just irresponsible dog walkers, but now commercial dog walkers want to use this as part of their business for free! Tell these freeloading bastards to go to hell or at least back to school. This is just a power and control game with them. We don't play their childish games.

We have not fought for the paltry little of the natural ecosystems we have, to let commercial interests destroy them.

Janet Fiore

**From:** [Cornelia Foster](#)  
**To:** [Pelka, John](#)  
**Subject:** No to commercial dog walking in the Presidio  
**Date:** Monday, December 17, 2012 10:51:13 AM

---

Dear Mr. Pelka,

I am a long time park volunteer and care deeply about the Presidio and it's value to our community. I'm sending you this email to let you know why i think commercial dog walking is not a good idea for Area B in the Presidio.

Already commercial dog walkers who are not approved work the Presidio and damage trails, scare people, and create clean-up costs. To open the door to more and actually sanction them doesn't make sense to me. I thought Presidio tenants couldn't have pets to protect park resources -- why let non-resident pets in via the dog walkers? They are not good for people, plants or wild animals.

Commercial dog walking has nothing to do with a National Park, and it degrades the Park experience. I urge you to keep commercial dog walking out.

Respectfully,

--Corny Foster  
Park Volunteer

**From:** [Amy Fritz](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking licenses  
**Date:** Friday, January 04, 2013 5:16:13 PM

---

For this license fee I hope you will have resources to patrol and monitor dog waste from these operations. Many of the walkers come here with several dogs and do not pick up any of the dog waste. I don't care nearly as much about these other issues (Terms and conditions of the City permit include receiving training, following safe practices for dog care, having insurance, and limiting the number of dogs a commercial dog walker may walk at once to eight.) as I do about this one. This cannot be good for wildlife or our kids who want to play in the grass.

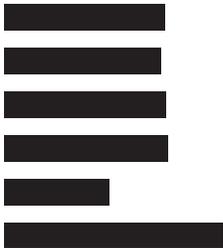
If we see a dog walker acting irresponsible in this way is there a number to call to report it? I think they bring the dogs here because it is so much easier to not pick up the feces.

Many thanks,

Amy

Amy Fritz

FRITZ DESIGN



**From:** [Sue Fry](#)  
**To:** [Pelka, John](#)  
**Subject:** comment re: 36 CFR Part 1002 (commercial dog walking)  
**Date:** Saturday, February 09, 2013 10:15:18 AM

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**RE: 36 CFR Part 1002  
Public Use Limit on Commercial Dog  
Walking; Revised Disposal Conditions**

Dear Sir or Madam,

I am writing to state my strong support and approval for this proposed action -- as well as my concern regarding what measures will be taken to enforce this law/rule if it is passed. We currently have a leash-law throughout San Francisco -- including Golden Gate Park with the exception of designated dog-runs -- and it may as well not even exist, since it goes unenforced. This, despite the fact that in the last few years, a dog off-leash caused a mounted SFPD officer's horse to shy, throwing her to the ground, injuring her, and causing her to go on extended disability; despite the fact that a dog off-leash got into the bison herd and killed one of the bison calves that had arrived in the Park on a few weeks before and numerous other incidents where dogs have caused physical injury and property damage.

I do not wish to bore you with examples, but I will give you just this one, and hope that it will speak clearly to the seriousness of the problems that the proliferation of dog-walkers is causing-- and potentially dangerous situations they are creating:

There is a stretch of road (W. Pacific Ave) that runs for a short distance uphill between Mountain Lake Park and the Presidio Golf Course. This is a favorite spot of dog walkers (there is a designated dog-run in Mtn Lake park, just to the south of W. Pacific -- this was NOT in that area) -- who will usually have 1 or 2 dogs on the leash -- and another 1, 2 or more off-leash.

About a year ago, I was running up this road from Mountain Lake, and stopped suddenly when I was confronted with the sight of an enormous pack of dogs to the right side of the road.

I stood and counted and there were actually *twenty-nine* dogs, every one of them *off-leash*, and just 5 people. The dogs were all breeds and sizes --from labs and a German Shepherd and pit-bull mixes to small poodle mixes. All packed in right together, milling around, the people standing idly chatting with each other and laughing -- they seemed to be paying little to no attention to the dogs.

I am not a woman who gets scared -- but this scared me to the point of wondering if I felt safe walking past them. And I was stunned that people who are supposed to be "experts" on dogs seemed to have no idea that dogs are pack animals...that if one dog were to go after another, they could find themselves in the midst of a dog-fight. And also that they would be so oblivious to the fact that this was an "unstable" situation.

**My question about this proposed rule or law is this: Is anyone actually going to have the authority to stop dog-walked and *cite* them or ban them from walking too many dogs in the Presidio?**

Even if they do have authority and means -- who is actually going to DO it? Without enforcement, this will just be another useless piece of paper, another law that dog-owners and walkers laugh at. (If I so much as politely ask a dog owner to *call* their dog if it is running towards me, I am usually showered with a flood of four-letter words.)

Also, this proposal that you have put forth also seems much like cutting a mole off the face of someone who has breast cancer..

**The far larger problem is allowing dogs to run off-leash in the Presidio and the need to address it immediately is desperate.**

As far as I know, it is pretty much standard throughout National Parks that dogs must be on leash in the areas in which they are allowed -- and there are often areas where they are not.

I do volunteer work with the Park Stewards and we have had staff members injured by dogs off-leash. It is maddeningly nonsensical that we are volunteering hours and hours to strengthen and preserve natural habitat for birds and animals -- when the Presidio allows dogs -- which are natural predators to many of these animals -- to run loose throughout the Park, leaving feces, disturbing ground-nesting birds, digging up newly planted plants, scaring animals -- and visitors to the Park.

I doubt that I have to tell you that NPS employees have been injured, requiring medical treatment after being attacked by dogs that were off-leash -- sometimes after owners were asked to look after their dog, and refused.

I have owned a number of dogs in my life, like dogs and friends and family members could tell you of their dogs

who do not "warm easily" to visitors -- but who, after 5 minutes, were sitting on the sofa next to me, or in my lap, or wagging their tails as I petted them.

So I like dogs and am not generally afraid of them -- but owning a dog is not a privilege. It comes with serious responsibilities to protect the dog and to keep the dog from becoming a problem or a danger to other members of the community. Allowing dogs to run off-leash in the Presidio is truly destructive and dangerous and can undermine the massive amounts of work and money being expended to care for the native natural environment that we are working so hard to protect and restore.

That the NPS should know the potential harm and danger of this, yet refuse to do what is necessary, is inexplicable -- and shameful.

Sincerely,

Susan Fry

██████████

████████████████████

**From:** [John Frykman](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walkers  
**Date:** Tuesday, January 15, 2013 7:50:55 AM

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The notion that these "professional" dog walkers should do so in the Presido or anywhere in the GGNRA is preposterous! They are totally uncontrolled, not generally licensed to do so, create dangerous situations between the dogs themselves and also with people. There are many of them who do not pick up the excrement left by the dogs. I've seen it near where I live on 47th Ave, 1 1/2 blocks from GGP. Talk to REC/Park people about how much trouble they are.

Sincerely,

--

John H. Frykman

[REDACTED]

[REDACTED]

P.s. I have two Corgis that I walk and take care of myself.

**From:** [Greg Gaar](#)  
**To:** [Pelka, John](#)  
**Subject:** commercial dog packs  
**Date:** Monday, January 14, 2013 1:07:00 PM

---

The priority of our national parks has always been the preservation of our natural resources. Allowing packs of off leash dogs, lead by commercial dog walkers will greatly impact the biodiversity of the Presidio.

Hundreds and hundreds of dogs digging, defecating and inevitably chasing and killing wildlife will greatly degrade the health of our national park. The Presidio Trust, the National Park Service along with thousands of volunteers and staff have put years of work and millions of dollars into restoring the rich habitats of the Presidio.

With all the rare and endangered plants and othr wildlife in the Presidio, an Environmental Impact Report should be required to determine the negative environmental impacts of this ill conceived plan.

It's shocking that the dog lobby has so much political power.

Thanks  
Greg Gaar

440 Hazelwood  
San Francisco, CA 94118

**From:** [Tena](#)  
**To:** [Pelka, John](#)  
**Subject:** I do not think that there should be professional dog walking allowed in the Presidio.  
**Date:** Saturday, January 12, 2013 11:40:09 AM

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I do not think that there should be professional dog walking allowed in the Presidio or in any national park.

Tena Gallagher



**From:** [Ted Garber](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio dog walking  
**Date:** Monday, January 21, 2013 11:49:04 AM

---

I live in Pacifica and I support professional dog walking in all areas, especially including all Federally managed properties, including Presidio and GGNRA areas. It is important to exercise and socialize our furry best friends and for many dog owners responsible professional dog walkers serve that need. Professional dog walkers improve public areas by their efforts to clean up after dogs, extra eyes that they provide improve response to problems that can occur.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Sincerely  
Ted Garber

A black rectangular redaction box covering the signature area.

**From:** [Angela Gardner](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walking in the Presidio  
**Date:** Thursday, February 21, 2013 12:45:38 AM

---

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.

Angela  
Sent from my iPhone



John Pelka  
The Presidio Trust  
103 Montgomery Street  
P.O. Box 29052  
San Francisco, CA 94129

18 January 2013

Dear Mr. Pelka:

As a park volunteer and user I am vehemently opposed to the Presidio Trust's proposed Public Use Limit on Commercial Dog Walking.

Your sanctioning commercial dog walking runs counter to the public interest and to the future of the Presidio.

Rather, I want enforcement of the current regulations, including 36 CFR 1005.3, 1005.6, and 1005.13, to keep illicit commercial dog walking in check, protect resources, ensure public safety, reduce visitor conflict and uphold National Park values.

Normally, National Parks do not even allow dogs in their boundaries. Commercial dog walking in such a heavily used urban setting as the Presidio will adversely impact public safety, environmental and scenic values, natural and cultural resources, and conflict among visitor use activities.

Commercial dog walking provides no service or benefit to any park users and commodifies a public resource which should be shared equally by all members of the American public.

I can tell you, as a hiker and bird watcher, that dogs in San Francisco are a terrible hindrance to my outdoor recreational enjoyment. Dogs chase wildlife and damage vegetation, and have several times made me feel threatened.

Please, let me at least enjoy all the work I have invested in the Presidio.

Sincerely,



Arlene Gemmill

(Former member of the RAB; chair of Sierra Club Wetlands Committee)



**From:** [Samir Ghosh](#)  
**To:** [Pelka, John](#)  
**Subject:** Off leash  
**Date:** Tuesday, February 26, 2013 11:15:30 AM

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Mr. Pelka,

I would like to take this opportunity to convey the paramount priority I place on having quality off leash recreation areas in the Bay Area. I moved to SF in large part for its dog friendliness. Not only do I believe these areas should not be reduced (in size, access, or rights), but believe they should be expanded.

City lands were entrusted to GGNRA/NPS to operate them for city resident recreational needs, not to fit into any other NPS agenda such as operating policy standardization or catering to the special interest groups that donate the most money.

I have no dog commercial affiliations. I'm simply a dog owner with global first hand experience and believe strongly that recreation and off leash restrictions create far more problems for the community and all residents than they solve. I am happy to elaborate with anyone who will constructively listen with an open mind.

Thank you for reading my note.

Best regards,  
Samir Ghosh



**From:** [elly gibbs](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walking  
**Date:** Saturday, January 19, 2013 10:02:39 AM

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I live in Sausalito and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

We usually d our walks in Marin, but very often meet friends in the city and walk our dgs together. No matter where you live, having access to open space to let the dogs walk is a must!

Regards,  
Elly Gibbs

**From:** [ADAM GOLDYNE](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walking  
**Date:** Saturday, January 19, 2013 10:29:42 AM

---

To whom it may concern:

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Adam Goldyne, M.D.



**From:** [Gonyaw, Chuck](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walker comment  
**Date:** Monday, February 11, 2013 11:30:45 AM

---

John,

The Trust should get a percentage of the city's dog walker fees!

Chuck Gonyaw  
Sign Tech

[REDACTED]

"I know that you believe that you understood what you think I said, but I am not sure you realize that what you heard is not what I meant."  
-Robert McCloskey

**From:** [John Gonzalez](#)  
**To:** [Pelka, John](#)  
**Subject:** Professional Dog Walking  
**Date:** Friday, January 18, 2013 1:49:48 PM

---

Hello,

I live in Pacifica and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

[John E. Gonzalez, EA](#)  
[Enrolled to Practice Before the IRS](#)  
[Visit my Website](#)

**From:** [Margaret Goodale](#)  
**To:** [Pelka, John](#)  
**Subject:** I oppose commercial dog walkers  
**Date:** Friday, January 25, 2013 6:25:28 PM

---

Dear Sir,

I vigorously oppose allowing commercial dog walking in any part of our Golden Gate National Recreation Area.

Only if some small area out-lying area, in which absolutely no chance of habitat restoration is possible, could be found would dog walkers be permissible. And only if the professional dog walkers paid all the costs of maintenance, oversight, and the necessary extra law enforcement. A very, very small area in an isolated but easily accessible spot that **does not impact other visitors** in any way.

Despite the strength of the dog lobby in San Francisco, the needs and values of other residents and tax payers must be considered first. As a tax payer I do not want to contribute to subsidizing commercial dog walkers. I want to walk trails without facing a phalanx of dogs and drive and park without jockeying around commercial vehicles loading and unloading their often out-of-control charges.

Thank you for your consideration,  
Margaret Goodale

**From:** [Kingman Gordon](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogs in the Presidio  
**Date:** Tuesday, February 19, 2013 9:54:48 AM

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Mr. Pelka,

I'm writing on behalf of some news I recently recieved in regards to walking dogs in the Presidio moving forward.

As a former New York City (Manhattan) resident and an SF (Marina District) resident for the past 14 years, I have always enjoyed taking my dog for a walk in nearby parks. Living close to the Presidio, I am always taking Clyde (10 year old Newfoundland) up an into the park for strolls, and I hope to continue to do so moving forward.

I strongly support commercial dog walking in the Presidio as well, as it allows city residents to keep our dogs healthy and exercised during the week when we're off at work. Obviously, there are many commercial companies that operate in the Presidio, and I'd like to think that a responsible commercial dog walking company should also be aloowed to operate there as well.

I strongly oppose the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

I appreciate your help and continued thoughts about ways in which we can continue to allow dogs to enjoy the Presidio.

Best,

Kingman Gordon

**From:** [Nancy Graalman](#)  
**To:** [Pelka, John](#)  
**Subject:** re: Commercial Dog-Walking  
**Date:** Wednesday, November 28, 2012 5:04:23 PM

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John ~~~

I am not certain of where "Area B" is in relation to the discussion of new limits on dog walkers in the Presidio. Could you let me know?

ALso . . . I could not get the "full text" of the proposal to come up . . . Is the link broken?

Of course, we here around Liggett Circle, just north of the West Pacific Grove, have been Ground Zero for abuses by dog walkers with up to 10 dogs . . . and 60 unleashed dogs at a time at one point. Ann Ostrander helped us immensely, and some things have improved, but they all arrive once in a while.

Thank you.

Nancy Graalman  


**From:** [Mary Gregory](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walking regulations - comment  
**Date:** Tuesday, February 19, 2013 9:29:29 PM

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Dear Mr. Pelka,

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. What we DON'T SUPPORT is the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, or change, without public comment, any part of the commercial dog walker regulations in the current proposal. The Presido Trust is MANDATED by NEPA (the National Environmental Policy Act) to involve the public through a participatory process before changing regulations such as these.

Thank you for listening,

Mary Gregory  
San Francisco Dog Owner

**From:** [Ron Gutierrez](#)  
**To:** [Pelka, John](#)  
**Subject:** Comments - Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio  
**Date:** Friday, February 08, 2013 8:07:49 PM

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I am writing to voice my full approval for the current proposal on commercial dog walking in Area B of the Presidio. As a long time user of the Presidio trails, especially in Area B, I have noticed the numerous multiple dog walkers who utilize the Presidio trails. I find that most of these commercial walkers are courteous and considerate users of the Presidio. There are a few rare exceptions when commercial walkers leave dogs off-lease on lease designated trails but for the most part their dogs remain on lease. Individual dog walkers, however, violate the lease designation far more often than comply w/ them and I have had a number of encounters w/ dogs off-lease who should be leashed. Off-lease dogs can often be seen off trail and their owners will not venture off trail to remove their excrement. Perhaps mutual enforcement of the new commercial proposals along w/ the existing regulations can lead to more walkers in compliance w/ lease requirements and excrement removal w/in the Presidio,

Respectfully,

Ron Gutierrez



**From:** [Robert Hall](#)  
**To:** [Pelka, John](#)  
**Subject:** oppose commercial dog walking  
**Date:** Monday, January 14, 2013 1:56:30 PM

---

Dear Mr. Pelka,

As a park supporter I have a keen interest in preserving park resources and upholding National Park values. I am writing to offer my comments in opposition to the Presidio Trusts proposed Public Use Limit on Commercial Dog Walking.

Illicit commercial dog walking activity within the Presidio has been responsible for damage to resources, threats to public safety, and visitor conflict. If adopted, the Presidio Trusts proposal will result in the continuance of commercial dog walking and its inherent adverse impacts. To sanction this activity and open the park up to commercial dog walking is not a reasonable, suitable, or logical remedy to the identified problems. Rather, enforcement of the current regulations, including 36 CFR 1005.3, 1005.6, and 1005.13, will keep illicit commercial dog walking in check, protect resources, ensure public safety, reduce visitor conflict, and uphold National Park values.

Commercial dog walking is not an appropriate activity for our National Park lands. Commercial dog walking will adversely impact public safety, environmental and scenic values, natural and cultural resources, and the avoidance of conflict among visitor use activities. Commercial dog walking will provide no service or benefit to any park users and will serve only for the capital gain of private enterprises at the expense of the American public.

Most sincerely,

Robert Hall  


**From:** [Sarah Hammann](#)  
**To:** [Pelka, John](#)  
**Subject:** Comments on Commercial Dog Walker Proposals for Area B of the Presidio  
**Date:** Friday, February 08, 2013 3:04:09 PM

---

Dear Sir/Madam,

I **support** the requirement for licenses for dog walkers in Area B of the Presidio. As a dog lover and frequent walker, I run into dog walkers daily who are unsuccessfully managing their 6-12 dogs per dog walker.

In several instances, I have experienced dog walkers not in control of their dogs. This has escalated substantially in the past few years and become a safety issue. It is now more difficult for people to ensure a safe, enjoyable walk on Crissy Field. It is common for dogs – often off leash - to run into or jump onto walkers (including seniors and children) – regardless of whether it is intentional or accidental. I’ve also seen far more wear & tear on the beach due to the many large groups of dogs being walked simultaneously.

While I love dogs, I think Crissy Field is first & foremost for people – it is not a dog park and is rapidly becoming one.

I fully support the requirement for training, following safe practices for dog care, having insurance, and limiting the number of dogs a commercial dog walker may walk at once to eight. I believe this proposal will improve visitor and dog safety and protect resources in Area B. I would also add an “on leash” requirement for dogs on the walking path and walking from the parking lots to the actual waterfront.

Regards,

**Sarah Hammann**

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**From:** [Patrick Harrington](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walking  
**Date:** Wednesday, November 28, 2012 5:01:19 PM

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As a resident of the presidio [REDACTED], I have no problem what-so-ever with professional dog walkers enjoying our wonderful space.

my dog is one of these animals which gets to participate in this while my wife and I are at work.

Sincerely,  
Patrick Harrington

**From:** [Cindy Hawks](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walkers in the Presidio  
**Date:** Saturday, January 05, 2013 9:02:25 PM

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I am sharing my comments and concerns related to dog walking in the Presidio. On numerous occasions I have encountered both commercial dog walkers and what appear to be dog owners walking their dogs off-leash on the presidio trails, and allowing their dogs to roam freely off-leash off the designated trails, or far ahead of them in the Presidio. At times I have seen dog walkers with an excessive number of dogs, up to 9, 10+ dogs at one time. My first concern is my own personal safety. Too many of these dog walkers/owners seem to have no or little concern with their dogs running up to me or others as we run or walk, and little or no concern with the dogs running with us as we run, and little or no concern that these dogs are out of their line of vision.

I find this concerning as I do not know how these dogs will behave, and see it as a safety and liability issue.

My next concern is how many dog owners or dog walkers allow their dogs to excrete on the grassy areas of the park that should be sanitary and reserved for people to enjoy. Yes, many of these people 'clean up' after the dogs, however the fecal residue and dog urine is on the grass, and is not sanitary for families or children, and essentially results in these areas becoming grassy patches for dogs, and not usable for people.

I have been troubled by the sheer number of dogs defecating and urinating on the grassy areas near the entrance of the Lombard gate by the Presidio Social Club, and the grassy areas in front of the Disney Museum, and the grassy areas at Crissy Field.

I implore the Presidio Trust to designate some of these grassy areas off-limits to dogs, so that people can sit on grass with some assurance that the grass is sanitary.

I also implore the Presidio Trust to require that dogs remain on a leash of reasonable length (to avoid lengthy leashes that pose tripping hazards for runners and walkers, and potentially put the dogs at risk) and that owners maintain more responsible control of their dogs, and for the Presidio to limit the number of dogs walked at a given time. My honest opinion is that anything beyond 3 dogs per dog walker poses a risk, and can be too much for one person to handle.

Having owned several dogs throughout my life prior to moving to the Presidio several years ago, I understand the need to exercise dogs. However, dog ownership is a big responsibility, and too many of the owners or walkers are rather indifferent to their actions, and are allowing the dogs to pose risks to people and encroach on the rights of others.

Thank you,  


**From:** [Dylan Hayes](#)  
**To:** [Pelka, John](#)  
**Subject:** Considering Commercial Dog Walking...  
**Date:** Monday, February 11, 2013 9:41:36 PM

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Mr. John Pelka,

Thank you for considering the issue of commercial practices in our beloved public space.

Commercial dog walking is already a highly unregulated and pervasive infringement upon most

other park users throughout San Francisco's parks. As a private business practice it should be considered

separately from any other dog policy and use in our City's National Park.

Commercial dog walking must not only be regulated to help fund the everyday damage it causes upon

the land and user scape, it should simply not be allowed in a National Park that people from around the world

come to enjoy the natural beauty and tranquility of. There's nothing more disturbing than a commercial dog walker

yelling after a bunch of dogs (which are typically off-leash) in a place your family and friends are trying to simply

be in open space.

Thank you for your time and consideration!

The Hayes Family, Dylan, Veronica and 3 year old Isa



**From:** [loretta brooks](#)  
**To:** [Pelka, John](#)  
**Subject:** Say no to dog walking  
**Date:** Wednesday, January 30, 2013 11:49:59 AM

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Our parklands should be places of solace for all wildlife, and allowing dogs and dog walking in the Presidio is exploitive and should not be allowed. Please stop this while you can. Thank you, C. Heimstadt

**From:** [Pam Hemphill](#)  
**To:** [Pelka, John](#)  
**Subject:** Comments on Commercial Dog Walking in the Presidio/February 24, 2013  
**Date:** Monday, February 25, 2013 9:08:16 AM  
**Attachments:** [Comments on Commercial Dog Walking in the Presidio.docx](#)

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## **Comments on Commercial Dog Walking in the Presidio/February 24, 2013**

I am opposed to any commercial dog walking in the Presidio for a variety of reasons:

The Presidio is restoring habitat for wildlife but too many dogs put this project at risk. The Presidio is not a dog park. There are already many individuals walking a dog there and some of those individuals already do not follow leash laws or pick up dog waste.

As a senior citizen, I walk in the Presidio for the exercise and for watching the birds and mammals. The many dogs already in the Presidio present a hazard to older people and to children. About 4.7 million Americans are bitten by dogs each year per the CDC, most are children in the 5 to 9 year old range. In San Francisco many elderly people already do not go to our parks because of the many dogs, often off leash, which can knock them over.

This commercial dog walking activity does not have to do with recreation for people. The owners of the dogs brought in by the dog walkers are not actively recreating in the Presidio. They are not even in the Presidio, but are at work or at home. One person, the dog walker is bringing in a pack of dogs. Dog packs do not belong in the Presidio.

The commercial dog walkers will not have their lucrative businesses affected in any way by not being able to walk dogs in the Presidio. There are more than 32 dog parks in San Francisco and many dog walkers simply walk their dogs in the neighborhoods. Walking the dogs close to where they are picked up avoids the pollution caused by transporting the dogs across the city, and saves gas money for the dog walkers. The commercial dog walkers make a personal choice to walk their dogs in the Presidio simply because they want to be in a beautiful place. But, by their very presence, they change the experience for the rest of us and alter the environment.

Imagine trying to pick up the waste of 8 dogs. We have all seen owners with one dog failing to do so...but eight! It is very unlikely that they will do a good job of this. And, will they carry the dog waste away with them, or will it, even if bagged, become the responsibility of the Presidio for disposal.

Please save the Presidio as important habitat for the wildlife of San Francisco, and as a recreational opportunity with space for those of us without dogs.

Pam Hemphill MD

Commissioner

Animal Control and Welfare Commission, San Francisco

**From:** [C or J Hibbard](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog-walkers in the Presidio  
**Date:** Saturday, December 15, 2012 7:22:23 PM

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December 15, 2012

Dear Mr. Pelka,

I understand there is a proposal before the Trust to allow commercial dog-walkers to operate in Area B of the Presidio. I would like to register my objection to that proposal. I myself like dogs; but even single dogs, let alone the sometimes six or eight often escorted off leash and poorly controlled, by the professional dog-walkers, can have a significant negative impact on the plant and animal life of an undeveloped area such as the Presidio. The large packs can also create unpleasant, and occasionally dangerous, experiences for the many park users who are not fond of dogs.

The burgeoning business of dog-walking for profit, which already operates illegally in many parts of the Presidio, undoubtedly benefits those who are making money out of it, but it has no benefit whatsoever, and several drawbacks, for other users of the park. It is, in effect, the exploitation of a fragile public resource for the benefit of a few entrepreneurs. Aside from the commercial aspect, it also runs contrary to at least two of the stated goals of the Presidio Trust Management Plan:

"Open space and natural habitats will be preserved, enhanced, and increased."

"The historic forest will be rehabilitated, wetlands enhanced, and native plant and wildlife species protected."

These goals may possibly coexist, though uneasily, with private individuals walking a leashed dog or two in the park. They are completely incompatible with large packs of off-leash dogs escorted by individuals bent on making a profit from this public resource.

I strongly urge you to reject this proposal. Thank you for your attention.

Sincerely,

Charles Hibbard



**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** Keep commercial dog walkers OUT OF THE PRESIDIO  
**Date:** Sunday, February 24, 2013 7:32:15 PM

---

Presidio Trust:

Those of us who served our country over 20 years (4 on the Presidio) did not serve to protect our country so greedy, disrespectful louts could destroy it just so they can feel in control. Tell these freeloaders they are banned from destroying the ecosystems of the Presidio and ALL parts of the Golden Gate Recreation Area. Already, the ecosystems of the Presidio are under seige. Tell these freeloaders to stay in the city--a city, unfortunately, which tries to make special use of the Presidio so it can save money. Tell San Francisco to build a dog-walking enclosed area.

Janet Holcomb

[REDACTED]

**From:** [Tony](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogwalkers Limit Comment  
**Date:** Wednesday, November 28, 2012 4:44:29 PM

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Commenting on the dogwalking limit proposal. I'm a park user and love dogs very much, though I don't have one now. However, there are other people who get very nervous with offleash dogs running about in the parks. I personally know such a person.

I think it is a good idea to have a limit on how many can be walked at a time. The last time I was hiking on the Park Trail, a dogwalker with more than this amount was trying to supervise some that were running ahead and barking loudly while following yours truly up the trail.

Though people try to control the dogs they are walking, sometimes it is difficult to hold on to all of them if they have a larger number to look after.

I've also experienced loose dogs barking and running after me in McLaren and Buena Vista Parks. The dog in the latter park actually leaped up on me before it finally listened to its owner. So this sort of thing is not a good idea for people who are afraid of loose, barking dogs, and a smaller number would mean less problems trying to control them.

Tony Holiday



**From:** [Tony Holiday](#)  
**To:** [Pelka, John](#)  
**Subject:** No to commercial dog walkers in our parks  
**Date:** Saturday, January 12, 2013 1:02:13 PM

---

I have expressed my opinion on this before. Often too many dogs are being walked at one time for their walkers to keep track of. The dogs run loose all over the place and often chase or jump up on other park users, barking, etc. and the walkers try to keep them controlled. No to the commercial walkers. Some people are nervous around dogs to varying degrees. I love them myself, but have also seen a lot of walkers with multiple dogs that are obviously not individual owners.

**From:** [Tony Holiday](#)  
**To:** [Pelka, John](#)  
**Subject:** NO to dog walking  
**Date:** Tuesday, January 15, 2013 7:55:09 AM

---

Let them go to Fort Funston! Up to 8 is far too much and some people aren't fond of dogs.

**From:** [Christine Holmes](#)  
**To:** [Pelka, John](#)  
**Subject:** Commerical Dog Walking  
**Date:** Tuesday, January 08, 2013 1:44:08 PM

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Hello,

I just wanted to let you know that I support your proposed Use Limits on Commercial Dog Walking in Area B of the Presidio. I love dogs, but national parks are not meant to be dog parks. I understand that there are areas in the Presidio where residents can't have a family dog; certainly commercial dog walking is completely out of place if this is the case.

I especially hope this works:

“The Trust is proposing a rule amendment that will require all persons controlling pets to remove pet excrement and deposit it in a refuse container. This rule will apply to all individuals whether or not they are engaged in commercial activities or meet the definition of Commercial Dog Walker under the City ordinance and permit system.”

Best Wishes,

Christine Holmes

*Bay Area Air Quality Management District  
Human Resources Analyst | Human Resources Office  
939 Ellis Street | San Francisco, CA 94109  
Office: 415.749.4938 | Fax: 415.749.4992  
[cholmes@baaqmd.gov](mailto:cholmes@baaqmd.gov) | [www.baaqmd.gov](http://www.baaqmd.gov)*

**From:** [Christine Holmes](#)  
**To:** [Pelka, John](#)  
**Subject:** No to Commercial Dog Walking in the Presidio  
**Date:** Wednesday, January 16, 2013 1:24:10 PM

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Hello,

I understand that the Presidio Trust has put forth a proposal to invite the commercial dog walking industry into Area B of the Presidio granting professional dog walkers, with up to eight dogs each, use of the Presidio's roadways, parking lots, public trails, and open spaces to conduct their business.

Under this proposal, it is estimated that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon. Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking lots, and walkers with eight dogs each will be ever-present on public trails and open spaces. The costs of administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers will be paid for by the American tax payer.

Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

**Keep** commercial dog walking out of our National Parks.

Thank you,

**Christine Holmes**

*Bay Area Air Quality Management District*

*Human Resources Analyst | Human Resources Office*

*939 Ellis Street | San Francisco, CA 94109*

*Office: 415.749.4938 | Fax: 415.749.4992*

[cholmes@baaqmd.gov](mailto:cholmes@baaqmd.gov) | [www.baaqmd.gov](http://www.baaqmd.gov)

**From:** [Vi](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio Trust  
**Date:** Friday, January 18, 2013 2:04:43 PM

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Dear Sir/Madam:

I live in *San Francisco district 4* and "do not" support professional dog walking service continuing in the Presidio as it is currently being commercially used for dog walking service. I am voicing my concerns as a dog guardian, public school teacher and property owner, and tax payer in San Francisco.

Though, professional dog walkers often provide much needed exercise and socialization for dogs, I have reservation in large pack encroachment in our public land areas. Therefore, I support the Presidio Trust's proposal for public use limits on commercial dog walkers in all public areas especially Area B of the Presidio because I believe in the preservation of natural habitats for future posterity. Natural resources for everyone is vital and commercial use should be well regulated.

Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians, particularly "professional dog walkers" to properly dispose of pet feces.

When I walk two dogs, I often witnessed dog walkers with large number packs (as large as 20 dogs have been seen). The ratio of dog walker to dogs is astounding and when more than one dog defecate at the same time, the dog walker is unable to locate and collect their feces for proper disposal.

Public areas such as the Presidio Trust land should not be commercialized and taken over by dog walkers. I would like to see it returned to the People and to responsible dog guardians who use it for recreational and leisurely purposes. And, I support the limit imposed on dog walking professionals to have a smaller pack not just for preserving public lands but also for the proper supervision and care of dogs.

Regards,

Vi Huynh

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking Proposal  
**Date:** Saturday, January 05, 2013 8:57:43 AM

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To Whom It May Concern:

(I would prefer if my name and address be kept anonymous from public disclosure).

I am offering comments regarding the proposal to limit Dog Walking in Area B. First of all, it is my understanding that Area B of the Presidio encompasses El Polin Spring, Lover's Lane, Inspiration Point, etc.

I live on the corner of [REDACTED] and walk my dog in these areas on a daily basis. My dog is a 100lb in-tact male. He is a well-trained, champion show dog, and shows no aggression towards other animals. When we moved into the Presidio two years ago, the biggest factor in our choosing this locale was the ample access to trails to take our dog. Unfortunately, we soon learned that walking him on the trails in our surrounding area required a limit: we cannot comfortably walk our dog Monday through Friday, from 7:00am-5:00pm because of local dog walkers. You see, packs of neutered dogs are often threatened by a single in-tact male. And frankly, my dog is intimidating to neutered males. The handful of times I've taken my dog on walks during typical business hours, has resulted in encounters with dog walkers that are generally not fun.

For example, my dog and I peacefully strolled through the redwood forest along the Ecology Trail about two years ago. As we approached the turn into the forest, I began to hear the snarls and barks of...wait for it...20 dogs. I'm not kidding. I counted the dogs each walker had. The two dog walkers were standing with their dogs on leash (THANKFULLY) and we having a simple discussion. Their dogs barked loudly and aggressively towards me and my dog. It was annoying, disrespectful and frankly, obnoxious. The best part was when I heard the, "Oh, he's in tact...that's why". At that moment, I realized that sunsets would be the most comfortable time for me to take my dog out. And since then, I haven't really taken him anywhere dog walkers play during business hours. It's just easier.

Also, allow me to describe something that occurred one month ago. I was sitting in my living room, glanced outside into our parking lot and saw a dog walker pull in, park in one of the designated spots on wash ALL of his dogs in the adjacent unit's yard, using their water. The first time I saw it, I thought, "well, it's been rainy and the trails are pretty muddy. It's fine...I need to chill out". But then, it happened the next day...So, I calmly approached him while returning from a walk and informed him "we have to pay for the water so please don't use it to wash your dogs". He was very nice and apologized, and I haven't seen him since.

I would like to add that one dog walker, who walks around the park and down at Chrissy Field, is very respectful and her name should be noted: Sperra. I don't know the name of her business, but she always respects others on the trail(s) and knows that it is her job to control her dogs. Her dogs are very well socialized and are friendly. I've never seen her walk more than five dogs at once. She knows my name and my dog's name because she takes the time to respect those who live in the area(s) she visits.

I pay a lot of money to live here. The biggest factor in living here, and choosing this park, was the access to trails for me and my dog. We love hiking. He's an excellent hiker. He pays no attention to hikers, bikers, walkers, runners. He'll greet other dogs in a friendly manner and go on his merry way. He's the ideal dog to live in this park and visit these trails. I shouldn't have to keep him inside all day because of overuse of trails by dog walkers that abuse the privilege of visiting here.

I know this proposal won't *limit* the amount of dog walkers on a given day, but I do hope the Trust does something to *monitor/manage* the amount of dog walkers on these trails. A dog walker with four dogs or less is tolerable and manageable. Also ,they ultimately have greater control over their dogs. In

addition, it would be nice to see dog walkers utilize other trails, not the same trail day to day(Who Let the Dogs Out and Romin' Rover use the Ecology Trail all day long). Perhaps more Trust employees need to monitor the parking area when dog walkers arrive. They park at the start of the Ecology Trail near the old landfill.

\*On a side note, I would like to suggest an additional waste basket somewhere along the Ecology Trail. Perhaps in the redwood forest I mentioned earlier. I have seen a lot of waste in that area, and discarded bags that are often forgotten. I think that is good place to have a waste bin. Selfishly, I would like to not carry poop of the entire trail, and often, my dog poops in that area.



**From:** [Annabelle Ison](#)  
**To:** [Pelka, John](#)  
**Subject:** new dogwalking ordinance  
**Date:** Monday, February 18, 2013 4:15:10 PM

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Dear Mr. Pelka,

Please do not adopt the part of the City of San Francisco's Commercial Dog Walking Ordinance that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

Thank you.

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Annabelle Ison



**From:** [Peter Jardine](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking Ordinance  
**Date:** Thursday, February 21, 2013 8:52:59 AM

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Dear Mr. Pelka,

I am a neighbor and almost daily user of the Presidio for walking my dog. The Presidio is a treasure to be treated with respect for all of us with dogs. The majority of commercial dog walkers I encounter in the Presidio are equally respectful and responsible. They provide invaluable service for dogs whose guardians are unable to provide daily recreation.

I strongly oppose the part of the proposed rule that the Presidio Trust can change San Francisco's Commercial Dog Walking permits at any time, and without public comment.

Sincerely,

Peter Jardine



**From:** [Bert Johnson](#)  
**To:** [Pelka, John](#)  
**Subject:** No!  
**Date:** Sunday, January 13, 2013 3:26:22 PM

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Please do not allow this in our national parks. Our parks should be for people, local and from far away, to enjoy walking our trails and enjoys views of water and nature without having to constantly be distracted by "dodging" both dog poop and the droves of dogs and walkers. This activity takes all the pleasure out of hiking in our national parks. Please do not be so short-sighted to appease the special interests of dog owners over the larger interests of people simply wanting to enjoy the trails, views and scenic ambience without the hassles and distractions of dogs, their excrement and the their noise (barking, etc.). A walking experience in our national parks is all about quietness, reflection of nature and the ability to enjoy it without distraction. Thank you for considering these comments in your future park plans.

**From:** [Bert Johnson](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walkers In Park - 2nd Comment  
**Date:** Wednesday, February 20, 2013 9:41:00 AM

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To Whom It Should Concern,

I emailed earlier, but would just like to reiterate my comments again.

Please do not allow dog walkers in this park, or in any other national park. I have nothing against dogs, but I do resent the disruptions and distractions that dog owners and their pets will often create...dogs barking...dog owners who often shout voice commands to their pets..and me having to focus on not stepping on dog poop left on the trail by discourteous pet owners. These dog-related distractions often ruin the national park experience. The national park experience should be one of peace, tranquility and a place to reflect upon the sights and sounds of nature. Please reserve the national parks solely for this purpose.

**From:** [Marilyn Kane](#)  
**To:** [Pelka, John](#)  
**Subject:** against commercial dog walking in the presidio (AREA B)  
**Date:** Tuesday, January 15, 2013 1:15:51 PM

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I am against the proposal that would allow commercial dog walkers into Area B of the Presidio. commercial dog walking has never been legally permitted on any of our National Park lands. There is no need to start it now. Commercial dog walkers have many places to take their dogs and should be able to fend for themselves.

Marilyn Kane  


**From:** [Joan Kaplan](#)  
**To:** [Pelka, John](#)  
**Subject:** commercial dog walking  
**Date:** Wednesday, February 20, 2013 10:44:54 PM

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Dear Mr. Pelka,

I am a long time resident (40+ years) and home owner in San Francisco. I am also a dog owner. During the day I rely on a responsible dog walker to exercise my gentle black labrador retriever who we adopted through the SPCA after he was abandoned. I think that the Presidio is a city resource that needs to be made available to all the citizens of San Francisco and needs to abide by the laws of San Francisco which allow for regulations on dog walkers. My dog walker is licensed and responsible. I'm concerned that the Presidio Trust is proposing a rule that will allow changes from city laws without comment. Please think this through carefully and consider that the Presidio is a diverse area with multiple uses and users--dog owners and dog walkers are part of our wonderfully diverse San Francisco community. We all know that we need to work together and not create restrictions that are inflexible. The Presidio is so vibrant and well used because of both the beauty of the land but also because of the openness of the thinking about its myriad uses. Please keep this perspective in mind as you consider rules that limit its use.

Respectfully,  
Joan M. Kaplan



**From:** [deanna kastler](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walking  
**Date:** Thursday, November 29, 2012 11:17:32 AM

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Dear Presidio Trust:

As a resident of the Presidio for more than four years, I have become more and more upset about all the dogs in the Presidio, particularly dogs OFF-LEASH. That includes the commercial dog walkers as well as others walking their dogs in the Presidio. The Presidio is a National Park and should not be used as a venue for people making money by dog-walking. If they are allowed in the Presidio, they should be regulated and charged a fee for the use of public lands for their money-making activities.

Sincerely,  
Deanna Kastler



**From:** [Mary Anne Kaviatos](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking Comment  
**Date:** Tuesday, February 26, 2013 11:14:02 AM

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I realize I am one day late in responding, but please consider my comments. I would very much appreciate it. I am someone who has a life threatening allergy towards dogs, and I am also really afraid of off-leash dogs. I did not see anything in this proposal to be sure that dog walkers keep the multiple dogs they walk on a leash. I tried once to take advantage of the Presidio YMCA's exercise walk through the Presidio and was terrified by all the dog walkers allowing their dogs to run off leash. When there are a group of dogs, they become a wild and uncontrollable pack and it should not be allowed.

**I absolutely support the Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio.**

A valid Commercial Dog Walking permit for dog walkers with four or more dogs at one time would assure that they would have to receive the proper training, follow safe practices for dog care, have insurance and limit the number to eight. Hopefully, this proposal will allow someone like me to walk through the Presidio without the threat of multiple dogs out of control.

This entire city has so many "off leash" dog parks that it is extremely limiting for people like me to go most places. I realize your proposal is not addressing the "off leash" policy that seems to be the norm around the city. However, I am very hopeful that this will be the beginning of exercising some control over the dog walker situation and the number of places that allow off leash dogs. Sometimes it feels like dogs and their dog walkers have many more rights than other residents in this beautiful city, who would like to take advantage of the abundance of natural areas and parks that we are lucky enough to have here.

I really hope that this proposal is passed. It would be a wonderful beginning.

Thank you for your consideration of my comments.

Mary Anne Kaviatos  




I would really appreciate hearing about the outcome of this proposal and of any other relevant proposals. Thank you again.

**From:** [Lindsay Kefauver](#)  
**To:** [Pelka, John](#)  
**Subject:** Keep Dog Walking Recreation in the Presidio - please !  
**Date:** Sunday, February 24, 2013 8:22:21 PM

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Mr. John Pelka  
The Presidio Trust

San Francisco Bay Area residents have enjoyed walking our dogs in the Presidio for generations and we want to continue to enjoy recreating with our dogs in the Presidio. Those of us who work during the day rely on commercial dog walkers to keep our dogs healthy with exercise. I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio. There are plenty of commercial companies and endeavors doing business in The Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

The Trust must designate areas for off-leash dog walking within its land. I support your plan to keep dog walking a recreation activity in The Presidio. There is no justification for removing the activity.

Furthermore, I urge you to remove the proposed rule that says The Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment. That is wrong. This is public land and the people have a right to weigh in always on usage decisions. I also disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. Statements like these have no credibility without providing evidence to support them, and anecdotal evidence cuts both ways but that is not appropriate for an environmental review.

Thank you for your consideration.

Sincerely,

Lindsay Kefauver

Lindsay Kefauver  
Visual Resources



**From:** [Kristina Kekke](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio Dog Walking  
**Date:** Friday, January 18, 2013 1:28:08 PM

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I live in Cow Hollow and support professional dog walking in the Presidio of San Francisco. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City. I walk my own dog there several times a week.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also very much support ALL regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Kristina Kekke

**From:** [Lynn Keller](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walking in Areas A and B of the Presidio Trust  
**Date:** Monday, February 18, 2013 1:27:56 PM

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Dear Sir:

I have had a business in San Francisco - employing over 20 individuals, for 23 years. I chose to locate my business in San Francisco for many reasons - and one important reason is the dog friendly atmosphere of San Francisco. In that regard I provide my comments on Dog Walking in Areas A and B of the Presidio Trust.

- I and many of our employees have enjoyed working our dogs in the Presidio for 23 years - and hope to continue to do this in the future.
- I completely support continued dog walking in the Presidio - including commercial dog walking - and the Presidio Trust adopting the City of San Francisco's new commercial dog walking ordinance.
- Commercial dog walking supports our residents having healthy and socially developed dogs - especially in a city where most families have two working individuals which means most dogs couldn't get outside for 10 - 12 hours a day without a commercial dog walker.
- The Presidio and GGNRA host many other commercial activities and businesses - why would commercial dog walking not be included? It is equally needed as the 'House of Air', 'Planet Granite', RMCA, SF Psychotherapy Group and more.

I also strongly oppose the part of the proposed rule that says the Presidio can change the City of San Francisco Ordinance governing Dog Walking permits at any time without public comment.

The City of San Francisco has a long history of supporting healthy human canine relationships. The City of San Francisco recognizes the importance of the canine human bond - and the role of exercise in having healthy well adjusted dog partners in our lives.

I hope this is a first step in the Presidio Trust finally adopting more canine inclusive policies in keeping with San Francisco's long held position on the importance of dogs in an urban environment.

Dogs need space to recreate unhindered.  
And we need our dogs.  
Our dogs make us better people.

Thank you for your consideration.  
Lynn Keller



**From:** [Kai](#)  
**To:** [Pelka, John](#)  
**Subject:** Save Off-Leash Dog Walking Areas in the SF Bay Area  
**Date:** Thursday, February 21, 2013 9:17:23 AM

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I am a San Francisco resident of voting age and I support saving the dog walking areas.  
Thanks,  
Kai

**From:** [Peter Kupfer](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogs Walking in the Presidio  
**Date:** Thursday, February 21, 2013 9:37:14 AM

Dear John,

I own a 5-year-old Lab and we enjoy walking in many different areas of the Presidio. Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to do so. Commercial dog walking in the Presidio has also been going on for decades. It allows us to keep our dogs healthy and exercised during the week when working. As you know, there are many other commercial activities going on in the Presidio, including Letterman Digital Arts Center, Sports Basement, the House of Air Trampoline Park, etc.

I oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment. That is undemocratic!

Thank you,

Peter Kupfer

.....

Peter Kupfer



**From:** [Norman La Force](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking in the Presidio  
**Date:** Saturday, January 12, 2013 2:14:03 PM

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John Pelka, The Presidio Trust,  
103 Montgomery Street,  
P.O. Box 29052, San Francisco, CA  
94129.

Dear Mr. Pelka,

As a park supporter I have a keen interest in preserving park resources and upholding National Park values. I am writing to offer my comments in opposition to the Presidio Trusts proposed Public Use Limit on Commercial Dog Walking.

Illicit commercial dog walking activity within the Presidio has been responsible for damage to resources, threats to public safety, and visitor conflict. If adopted, the Presidio Trusts proposal will result in the continuance of commercial dog walking and its inherent adverse impacts. To sanction this activity and open the park up to commercial dog walking is not a reasonable, suitable, or logical remedy to the identified problems. Rather, enforcement of the current regulations, including 36 CFR 1005.3, 1005.6, and 1005.13, will keep illicit commercial dog walking in check, protect resources, ensure public safety, reduce visitor conflict, and uphold National Park values.

Commercial dog walking is not an appropriate activity for our National Park lands. Commercial dog walking will adversely impact public safety, environmental and scenic values, natural and cultural resources, and the avoidance of conflict among visitor use activities. Commercial dog walking will provide no service or benefit to any park users and will serve only for the capital gain of private enterprises at the expense of the American public.

Commercial dog walking has not been permitted in other national parks. Moreover, the proposal to allow up to 8 dogs per walker would mean that many trails and areas would be overrun with dogs forcing other uses off the trails or to other trails and areas. Please do not approve this use.

Sincerely yours,  
Norman La Force

**From:** [Cheryl Lazar](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogs in the Presidio  
**Date:** Thursday, February 21, 2013 11:53:37 AM

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1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.

Cheryl Lazar  
PARAGON REAL ESTATE GROUP



**From:** [Enid Leff](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walkers  
**Date:** Saturday, February 09, 2013 11:26:18 AM

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I was glad to learn of the new rules for commercial dog walkers. I hope the requirements include the use of solid paths only and no dogs on the grass, (even less than seven dogs) and, of course, cleaning up after the dogs, if necessary. Will there be containers for dog trash along the way? I've seen those in other parks and they are very useful.

Thank you.      Enid Leff  
                         San Francisco

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** Proposed Public Use Limit on Commercial Dog Walking in Area B of the Presidio  
**Date:** Saturday, December 01, 2012 10:15:58 PM

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Dear Mr. Pelka:

I am for the proposed public use limit on commercial dog walking in Presidio's Area B. As a resident of San Francisco who lives near the Presidio, I am tired of having my Presidio walks spoiled by those who cannot or will not take responsibility for the animals in their charge.

My only concern about this proposal is: how will it be enforced? Will Park Service rangers have the ability to cite dog walkers who are out of compliance with the new regulations? I would be ok with this, I just want to make sure that the new proposal can and will be enforced!

Thank you in advance for considering my comments.

Sincerely,

Adrienne Leifer

[REDACTED]

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** Presidio Trust New Rules For Dog Walking  
**Date:** Thursday, February 21, 2013 11:25:03 AM

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John,

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

I hope you will take all of this into consideration.

Thank you,  
-Rob  
(Crissy Field Dog Group Member)

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** NO PROFESSIONAL DOG WALKERS IN SAN FRANCISCO'S PRESIDIO, PLEASE ... THE HUNDREDS OF DOGS WOULD RUIN BOTH THE ENVIRONMENT AND THE ENJOYMENT OF THE PRESIDIO.  
**Date:** Saturday, January 12, 2013 1:37:06 PM

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Dan Liberthson and Kathy Rawlins



**From:** [Donald Lim](#)  
**To:** [Pelka, John](#)  
**Subject:** Professional Dog Walking  
**Date:** Friday, January 18, 2013 5:24:07 PM

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I live in *South San Francisco* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,  
Donald Lim

**From:** [Saw Lim-Skain](#)  
**To:** [Pelka, John](#)  
**Subject:** No to Commercial Dog Walkers  
**Date:** Thursday, January 31, 2013 10:00:58 AM

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Dear Mr. Pelka: I write in opposition to any plan that allows commercial dog walkers greater access to the Presidio. In all frankness, I must ask if members of the Presidio Trust have lost all sense of your basic mission and true responsibility? We are dealing with a national treasure; and as such, any choices you make should benefit the widest possible user base and protect the natural resources of the park. Commercial dog walkers represent a narrow and self serving interest group. No amount of money will compensate for the negative impacts this activity will cause. In my experience, dogs are like second hand smoke. For most of my lifetime, I was required to just put up with it. Now, the time has come to confine, control and end it. I feel the same way about off leash dogs and commercial dog walkers. Just say NO to commercial dog walkers. Please save the Presidio so it is a source of joy and inspiration for all its visitors. Thank You. Saw Lim-Skain.

**From:** [Jennifer Lively](#)  
**To:** [Pelka, John](#)  
**Subject:** professional dog walking in the Presidio  
**Date:** Tuesday, January 22, 2013 12:51:49 PM

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I live in Presidio Heights in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide a needed exercise and socialization for responsible, safe and humane dog care. Well cared for dogs improve the health, safety and well being of the people that live in the city.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Sincerely,  
Jennifer Lively

**From:** [Thomas Lloyd-Butler](#)  
**To:** [Pelka, John](#)  
**Date:** Wednesday, February 20, 2013 8:31:34 AM

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Dear Sir,

I'm writing against your proposed rules for dog walking in the Presidio.....your organization is like a gestapo....putting into effect rules which nobody supports, cares about or needs! STOP IT!!!!!!!

Specifically:

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. What we DON'T SUPPORT is the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, OR change, without public comment, any part of the commercial dog walker regulations in the current proposal. The Presido Trust is MANDATED by NEPA (the National Environmental Policy Act) to involve the public through a participatory process before changing regulations such as these.

Thomas Lloyd-Butler  


heil hitler.

**From:** [Marisa Lo](#)  
**To:** [Pelka, John](#)  
**Subject:** The Presidio Trust  
**Date:** Thursday, February 21, 2013 10:05:03 AM

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Dear Mr Pelka,

I am writing to you in regards to the changes proposed to Area B of the Presidio, which the Presidio Trust is responsible for. Please see below my point of view on this matter.

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.
4. We disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. The Trust cannot make statements like that without providing evidence to support them, and anecdotal evidence does not count.

Kind regards  
Marisa Lo

**From:** [Melanie Loftus](#)  
**To:** [Pelka, John](#)  
**Cc:** [Jarrett Streebin](#); [Jan Mills](#)  
**Subject:** Please continue to allow off-leash recreation in the Presidio  
**Date:** Thursday, February 21, 2013 3:12:27 PM

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Hello John,

I am a dog owner and lover of the Presidio (I live in Pacific Heights and go to the Presidio all the time). I also have a dog walker who often takes a group of dogs to various parts of the city for exercise, including the Presidio, while I am at work.

First, I would like to emphasize my support for continuing to allow dogs off leash throughout the Presidio, whether with their owners or with commercial dog walkers. I am always careful to keep my dog off sensitive sites, such as newly planted areas or marked habitat, and I just like the freedom of letting my dog get the extra exercise of being off-leash. It is crucial that my dog get the same access with my commercial dog walker while I am at work. Please continue to allow this sort of recreation.

I also oppose the rule saying that Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment. This makes no sense and sets the Trust up for making closed-door decisions. I am currently on the waiting list to live in the Presidio, and I would hate to move there only to find that the rules have been changed without my input.

Finally, I disagree that dogs cause damage to the environment. You have to remember that we are in a city with more dogs than children, and it is not fair to make such assertions without hard evidence showing that this is the case. It seems to me that the major player in our environmental damage has to do with the people in this city, not our dogs.

In fact, I believe that my dog-owning friends are much MORE environmentally aware than my non dog-owning friends. To bar us from recreating in the Presidio would be counter-productive. I take great interest in all the restoration work the Presidio is doing, and often while walking my dog, I stop to read about the various projects going on, as well as the history of the place. Without engaging actively interested citizens like myself, the Presidio Trust is shooting itself in the foot.

Thank you for taking my email into consideration today, and please continue to allow off-leash recreation in the Presidio.

Melanie Loftus  
  


**From:** [David Long](#)  
**To:** [Pelka, John](#)  
**Subject:** Do not open the Presidio to commercial exploitation by professional dog walkers  
**Date:** Saturday, January 12, 2013 4:24:41 PM

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John Pelka  
The Presidio Trust  
103 Montgomery Street,  
P.O. Box 29052, San Francisco, CA 94129.

I am writing to express strong opposition to the Presidio Trust proposal to permit commercial dog walkers to use Area B of the Presidio National Park. Making 80% of the Presidio a commercial dog walker destination would degrade the experience of the Park for citizens such as myself. It is hard enough to police whether pet owners pick up and properly dispose of their dog's feces. To add to this the near impossible task of policing the pet excrement from an exponentially larger number of dogs roaming the park in packs of 8 will make the Presidio an unattractive place for me and many others to visit. As an active member of the California Native Plant Society, I have frequently noted with approval and visited the efforts that are being made to restore much of the native vegetation to the Presidio. Inviting commercial dog walks to use the park as an exercise and defecation venue would be directly contrary to the laudable efforts underway to restore the Presidio's biodiversity. Approval of this proposal would put the interests of commercial dog walkers ahead of the interests of all the other persons who use the park.

David C. Long



**From:** [Denise Louie](#)  
**To:** [Pelka, John](#)  
**Subject:** NO to dog walkers  
**Date:** Sunday, January 13, 2013 11:12:09 AM

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Dear John and The Presidio Trust,  
Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Let's *not* set this precedent. I do not like dogs or dog walkers. They scare me and ruin the peace I seek in our parks.

Thank you,  
Denise Louie  
San Francisco native, resident, taxpayer, volunteer

Liza Lozovatskaya  
[REDACTED]

February 25, 2013

Presidio Trust  
103 Montgomery Street  
San Francisco CA, 94129

Re: Comment on Proposed Rule 36 CFR Part 1002

To Whom It May Concern:

I would like to express my support for proposed rule 36 CFR Part 1002, Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions. I would also like to thank Clay Harrell for meeting with me to discuss the impetus and reasoning behind the proposed rule.

As an avid runner, I visit the Presidio on a weekly basis. I very much appreciate the steps that the Presidio Trust has taken to preserve the park's beauty, natural resources and unique wildlife. As a native San Franciscan, it is very important to me that the Presidio continues to grow, prosper, and remain preserved for future generations to come. As such, my biggest concern regarding the proposed rule is the effects that a large number of dogs could have on the Presidio's fragile ecosystem. However, Mr. Harrell adequately addressed my concern. I was happy to hear that the Presidio Trust has worked closely with the City of San Francisco to create a uniform permit system for all commercial dog walkers throughout San Francisco County. Mr. Harrell explained that under the new rule, dog walkers will be held to the same standards in the City of San Francisco as in the Presidio, and as such, they will not favor walking their dogs in the Presidio over the city. Consequently, this decreases the risk of higher dog walking traffic in the Presidio, and avoids a potential cause of resources destruction. I was very happy to hear this.

I would also like to express some, limited concern regarding dog walking regulations in the areas of the Presidio managed by the National Park Service, in particular Crissy Field. I understand that this proposed rule does not apply to this area of the Presidio, and I hope that whatever dog walking regulations will be implemented they will be at least as stringent as those in the current rule. To the extent that the Presidio Trust has an impact on those regulations, it is important to me that the natural beauty of that area of the Presidio be just as strictly protected.

Thank you very much for your time and consideration. If you have any questions I can be contacted by e-mail at [REDACTED]

Sincerely,

Liza Lozovatskaya

**From:** [Mark Maberley](#)  
**To:** [Pelka, John](#)  
**Subject:** No commercial dog walking in Presidio!  
**Date:** Tuesday, February 19, 2013 1:41:54 PM

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Just Say No!!!!

**From:** [Karen Melander Magoon](#)  
**To:** [Pelka, John](#)  
**Subject:** Keep professional dog walking out of our parks!!!! Thanks and Happy New Year  
**Date:** Saturday, January 12, 2013 2:56:17 PM

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Karen Melander Magoon, D.Min.

[REDACTED]

**From:** [John Manning](#)  
**To:** [Pelka, John](#)  
**Subject:** no commercial dog walkers in Presidio, PLEASE  
**Date:** Tuesday, January 15, 2013 4:12:59 PM

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Dear Mr. Pelka,

As a very long-time San Francisco resident and likewise frequent visitor to our precious Presidio, I want to register my opposition to the ill-advised proposal to open to professional dog walkers this space of refuge from exactly such things as them.

Thank you and whoever will ultimately make this decision for considering my views --

John Manning

John R. Manning

MANNING BUSKE FORENSICS

[REDACTED]

[REDACTED]

**From:** [Ed Marwitz](#)  
**To:** [Pelka, John](#)  
**Subject:** I Support Professional Dog Walking in the Presidio!  
**Date:** Friday, January 18, 2013 2:31:45 PM

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Hi,

My wife Noel and I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

We live within walking distance of the Presidio and enjoy the fact that I can share it with my favorite four legged friends... and their wonderful caretakers! We have spent many years enjoying the Presidio and its trails with our dog Sam and look forward to it continuing to be a welcome place for our dogs in the future.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,  
Ed Marwitz

**Ed Marwitz**

[REDACTED]  
[REDACTED]

**From:** [Sharon McMahon](#)  
**To:** [Pelka, John](#)  
**Date:** Friday, January 18, 2013 8:34:01 PM

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I own a home in the Cow Hollow area of San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City. Unless they have regular exercise and exposure to other dogs we will all have a problem.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Sharon McMahon  


\*\*\*\*\*

**About the Author:** This e-mail is authored by Arnita Bowman, who enjoys the GGNRA and Bay Area parks with her family, including the family dog, and is a member of several Bay Area organizations that are working to preserve open-spaces for all people, including those that enjoy both on-leash and off-leash dog recreation.

**Cancellation:** To be removed from this email distribution, please respond to [saveoffleashdogs@gmail.com](mailto:saveoffleashdogs@gmail.com) with "Cancel" in the subject line. Thank you for your support in keeping the Bay Area people and dog-friendly.

Sent from my iPhone Sharon McMahon

**From:** [Sharon McMahon](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogs in the Presideo  
**Date:** Wednesday, February 20, 2013 8:40:16 AM

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*Dear Mr. Pelka;*

*I am a concerned dog and home owner in the Cow Hollow area. Please consider my following comments on the requests I have for dog walkers and dog owners in San Francisco.*

*I also own a home in Sonoma where the dog leash rules are quite stringent and very few dogs get out of there backyard. When walking in public areas, they are so much more aggressive than our dogs here in SF. Their socialization skills are so important to fewer incidents in our community. Here are my requests:*

- 1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.*
  
- 2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).*
  
- 3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.*

*Thank you*  
*Sharon McMahon*



**From:** [Amy Meyer](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walking  
**Date:** Sunday, February 24, 2013 8:44:43 AM

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To the Presidio Trust:

Comments with regard to **Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions**

It is understandable why the Presidio Trust wants to make sure that when the City of San Francisco commercial dog walking (CDW) regulations go into effect the Presidio will not experience a rush of large groups of dogs walked by vendors who preferred not to buy a city permit.

However, the city's limitation on the number of dogs— 4-8 with one handler— is larger than the one proposed by the NPS: more than 3 and no more than 6. Also, the NPS expects to create a separate permit for the national park lands. I do not think it is a good idea for the Presidio Trust get into a two-stage process where it allows the dogs with city permits and a larger number of dogs than the Trust has expressed that it really wants: the NPS 3-6 limitation— and then later to set a different limit and also to require a different permit.

In many ways, the federal park lands are distinctly different from those of the city and the intentions in saving these lands for public use are also different. The CDWs are a city matter. If the national park makes room for them it is entitled to set a standard that will meet the legislated intention of preserving the natural, historic, scenic, and recreational resources of the Golden Gate for public education and recreation. These lands are visited by people from all over the nation and the world. Also, management of these lands has to be considered in relation to the other 398 national park units not only meeting some needs of city residents.

It would be much better for the two federal agencies to come out together with one system clearly defined. I hope it will be possible for the NPS to get the CDW issues separated from the Special Rule Making for all dogs that is near the end of its process but will still take some time. Even if that does not happen, it would be better to endure a few months of too many dogs than to have to backtrack on numbers and possibly require vendors ultimately to get two permits. Simplicity and no changes is best in this kind of situation.

The lower number of dogs permitted on the national park lands will ultimately place an unpopular limitation (to the CD Walkers, not anyone else) on those lands, but at least the Trust will not be accused of some sort of double-dealing, with some bad PR as a result.

What is missing from the Federal Register notice is a sense of where on the Presidio the CDWs can take their charges. Surely we do not want them on the lawns of the Main Parade and Old Parade, for example— nor do we want family pets there. To come by on a Sunday and see people using the lawns for picnics and frisbee is a most welcome sight and no matter how careful a CDW or owner is, there will necessarily be the leavings of urine and feces that no one coming for that sort of enjoyment should have to contend with. For the purposes of any CDW announcement, I think it is important that some definition be given of where the

CDWs can go. I think that would best be worked out collaboratively with the GGNRA so there are a few agreed-upon places in each jurisdiction and they are barred from any others. That is another reason for making a joint announcement.

Concerning the excrement disposal requirements of this notification, I think they are well expressed

Amy Meyer

**From:** [Lynn Miller](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio  
**Date:** Thursday, February 21, 2013 8:12:24 AM

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1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.

Lynn Miller

**From:** [sandra miller](#)  
**To:** [Pelka, John](#)  
**Subject:** Re: Area B (Re: Proposed Public Use Limit on Commercial Dog Walking)  
**Date:** Friday, January 18, 2013 11:36:43 AM

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Thank you John  
I have noticed some areas of degradation where lots of dogs run. The dogs look happy. But perhaps the ground becomes a little less stable so the trees are probably less happy.  
Sandra

Sent from my iPhone

On Jan 18, 2013, at 9:41 AM, "Pelka, John" <[JPelka@presidiotrust.gov](mailto:JPelka@presidiotrust.gov)> wrote:

Dear Ms. Miller-

Thank you for your interest in our proposed public use limit on commercial dog walkers. Area B is the inland portion of the Presidio managed by the Trust; Area A is the coastal area under NPS jurisdiction (see attached map).

Best,

John

**JOHN PELKA**  
COMPLIANCE MANAGER

**THE PRESIDIO TRUST**  
103 Montgomery Street  
P.O. Box 29052  
San Francisco, CA 94129

☎: 415.561.5365

✉: [jpelka@presidiotrust.gov](mailto:jpelka@presidiotrust.gov)

<Area B.pdf>

**From:** [Karen Misuraca](#)  
**To:** [Pelka, John](#)  
**Subject:** dogs in the Presidio  
**Date:** Friday, January 04, 2013 6:12:58 PM

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Dogs don't belong in the Presidio at all--I've seen many dogs off-leash in the park. People in big cities need to keep their dogs to themselves, not destroy habitat and landscaping and harrass wildlife and people.  
KM

**From:** [Melissa Montgomery](#)  
**To:** [Pelka, John](#)  
**Subject:** Support for Professional Dog Walking in the Presidio  
**Date:** Friday, January 18, 2013 2:05:48 PM

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I live in San Francisco and believe that professional dog walking should be allowed in the Presidio. It is very important for dog owners to have access to professional dog-walking services to provide exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,  
Melissa

**Melissa Moran**  
Managing Partner  
West Group Real Estate, Inc.

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

**From:** [Melissa Montgomery](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio Trust - New Rules for Dog Walking  
**Date:** Monday, February 25, 2013 10:14:36 AM

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Dear Mr. Pelka,

I am a San Francisco resident and dog owner. I strongly support the rights of dog owners to enjoy off leash recreation with their dogs at the Presidio. Furthermore, I believe the lawn on the main post should be an off leash dog area.

I also urge you to support commercial dog walking in the Presidio. It is vital to working dog owners that their dogs are able to get exercise during the day. I oppose the portion of the proposed rule that allows the Presidio Trust to change the Commercial Dog Walking regulations at any time without further public comment.

Sincerely,  
Melissa Montgomery

**Melissa Montgomery**  
Managing Partner  
West Group Real Estate, Inc.



Jim Morrell



January 11, 2013

Mr. Frank Dean  
General Superintendent  
Golden Gate National Recreation Area  
Building 201, Fort Mason  
San Francisco, CA 94123-0022

Re: Commercial Dog Walking

Dear Mr. Dean:

This is to advise you of my opposition to commercial dog walking anywhere in the GGNRA. Accordingly, I also oppose the Presidio Trust's proposed Public Use Limit on Commercial Dog Walking. This stems from my vested interest in maintaining the natural beauty of GGNRA, as a volunteer with the Habitat Restoration Team in Tennessee Valley the past six years.

As you know, commercial dog walking activity has been responsible for damage to natural habitat and threats to public safety throughout the GGNRA, including the Presidio and Fort Funston. Such activity provides no benefit to any park visitors, serving only to put money in the pockets of private business at the expense of the American public.

The Presidio Trust proposal, which requires permits for commercial dog walking, will result in the increase of this activity and degrade the beauty of GGNRA. On the other hand, enforcement of current laws will keep illicit commercial dog walking in check.

Commercial dog walking is not an appropriate activity for National Park lands, which have been established to provide quiet, uncluttered views and landscapes. Thank you for your consideration in taking steps to end this disruptive business activity in the GGNRA.

Sincerely,

A handwritten signature in black ink, appearing to be "John Pelka".

cc. John Pelka, Compliance Manager, The Presidio Trust  
Greg Moore, President & CEO, Parks Conservancy

**From:** [Beth Moseley](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking Comment  
**Date:** Wednesday, February 20, 2013 5:06:45 PM

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Hi John:

I just wanted to weigh in before the end of the comment period regarding commercial dog walking in the Presidio.

I am very much against this use of the beautiful space in the Presidio. I believe the City and County of San Francisco goes out of its way to accommodate commercial dog walkers (and dog owners for that matter) with an abundance of areas for their use in the City's parks.

No matter how well behaved the large group of dogs may be I feel that their presence is not aligned with the experience that a visitor to our national park should have. Our precious National Parks - especially our Presidio gem - is no place for commercial dog walking.

Thank you for allowing me to voice my opinion on this matter.

*Beth Moseley*



**From:** [Sharon Muczynski](#)  
**To:** [Pelka, John](#)  
**Subject:** No to opening Presidio to dog walkers!  
**Date:** Saturday, January 12, 2013 11:20:57 AM

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Mr. Pelka,

Please do not allow dog walkers with all their dogs to walk in the Presidio.

Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan. All those dogs will destroy habitat.

Best Regards,  
Sharon Muczynski LEED® AP



**From:** [Lani Mulholland](#)  
**To:** [Pelka, John](#)  
**Subject:** Professional dog walkers  
**Date:** Tuesday, January 15, 2013 10:34:48 AM

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Stop this plan. I do not want professional, for-profit dog walking in our public parks. We diaper our children. Until dog users show the same courtesy, they do not deserve to parade their toxic waste spewing creatures in, of all places, a National Park.

Lani Mulholland  


**From:** [Patricia Murino](#)  
**To:** [Pelka, John](#)  
**Subject:** Support Professional Dog Walking in the Presidio  
**Date:** Friday, January 18, 2013 6:20:17 PM

---

Hello,

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City. I'm sure many of your donors own dogs and support dog walking in the Presidio.

Sincerely,  
Patricia Murino

**From:** [Mouse Naboo](#)  
**To:** [Pelka, John](#)  
**Subject:** Oppose a new measure to "regulate" dogwalking and ban dogs use in the Presidio  
**Date:** Thursday, February 21, 2013 11:10:49 AM

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1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.

**From:** [David Nale](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio Trust new rules for dog walkers in Area B  
**Date:** Wednesday, February 20, 2013 1:23:03 PM

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I understand there will soon be a hearing about adopting new rules for dog walkers in Area B of the Presidio.

I support the idea of adopting the City of San Francisco laws that regulate dog walkers to eight dogs and impose other regulations already approved by the city.

I absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.

Thank you for keeping the Presidio open for enjoyment by those with both two and four legs.

Sincerely,  
David Nale



**From:** [Nelson, Chuck](#)  
**To:** [Pelka, John](#)  
**Cc:** [Kathryn McGeorge](#)  
**Subject:** Support for Presidio Dog Walking:  
**Date:** Wednesday, January 23, 2013 10:17:51 AM

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Mr. Pelka,

I am writing in support of professional dog walking in the Presidio. My wife and I have a 5 year old Border Collie who regularly visits the Presidio with her pack under the supervision of a professional, licensed dog walker. Having access to large open areas such as the Presidio is a critical part of providing for our high energy breed.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,  
Chuck Nelson & Kathryn McGeorge



**From:** [David Nelson](#)  
**To:** [Pelka, John](#)  
**Subject:** Comments on dog walkers proposal  
**Date:** Friday, February 08, 2013 9:26:44 PM

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Dear Mr. Pelka,

I am writing to support this first small step to control the number of dogs in the Presidio and how they are handled. While the commercial dog walkers have certainly made the Presidio "San Francisco's doggie toilet," it is the individual dog owner that is more inclined to walk the dog off leash and leave feces uncollected. Individual dog owners more often believe that their dog is well behaved, under voice control, and doesn't poop, when, in fact, none of this is true.

So this proposal is a little bit like "singing to the choir" ...while the church is burning down. Hope that metaphor isn't too obscure.

Sincerely,  
David J. Nelson  
Presidio resident and avid park user

**From:** [mcnicholson](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walking  
**Date:** Wednesday, February 20, 2013 11:00:50 AM

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I love dogs. I also love our parks. Please NO COMMERCIAL DOG WALKING  
IN THE PRESIDIO.

Mary Nicholson

**From:** [Anne Odriscoll](#)  
**To:** [Pelka, John](#)  
**Subject:** Let the dogs be!  
**Date:** Thursday, February 21, 2013 10:51:54 AM

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Please leave the dog walkers alone! The dog walkers do a great job of maintaining control of their packs. Arbitrary dog limits with no backup documentation serves no purpose! I walk my son and dog on a daily basis in both Areas A and B of the presidio and have for my entire life. Stop blaming dogs for all management issues!

Sincerely, Anne and Alexander and Zoe ODriscoll

Sent from my iPhone

**From:** [Cristin Pescosolido](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking comment  
**Date:** Friday, February 08, 2013 2:49:26 PM

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I wholeheartedly support a public use limit on commercial dog walkers, but I feel that dog walkers with three or more dogs should be required to have a permit, and to be able to have no more than six dogs at once in all sections of The Presidio, not just Area B, but I don't know if The Presidio Trust has control over other areas. I also would support a "no dogs off leash" ruling to be formalized.

Thank you for your time!

--

cristin pescosolido  


**From:** [Charles Pfister](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking -- Comments are due by January 25, 2013  
**Date:** Thursday, January 24, 2013 9:26:32 PM

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John Pelka  
 The Presidio Trust  
 103 Montgomery Street,  
 P.O. Box 29052, San Francisco, CA 94129.

Dear Mr. Pelka:

I was shocked to hear that the Presidio is considering approving commercial dog walking in Area B of the Presidio. Have you read the thousands of pages of complaints and incident reports generated by off-leash dogs in GGNRA?

Although I am familiar with studies of the impact of dogs on wildlife (see for example Lenth et al. 2008) and have published research related to the impacts of human disturbance, including dogs, on wildlife (Pfister et al 1992), I am confining my remarks to you about the impact of off leash dogs on the experience of visitors to the Presidio.

Various subgroups of visitors have extraordinary safety concerns because of off-leash dogs, including: 1) the elderly; 2) visitors with young children; 3) blind and disabled visitors; 4) various minority groups; and 5) visitors who suffer from fear of dogs because of previous experiences or for other reasons. For many in these groups, an off-leash dog area may represent a flat out "no go" area. For visitors who do not necessarily have extraordinary safety concerns, the impact on their visiting experience due off-leash dogs can also be strong enough to displace them from off-leash areas. Off-leash dogs can completely destroy the quality of this experience for many visitors.

A study of visitor experience related to dogs in open space areas in Boulder, CO (Vaske & Donnelly 2007) indicated that a significant proportion of visitors to open space areas reacted strongly to negative behavior associated with off-leash dog walking . A total of 951 visitors, both dog owners and non-dog owners, completed questionnaires regarding their attitudes towards potentially disruptive behavior by dogs. Those dog behaviors were classified as "direct" and "indirect" and were as follows:

Direct behaviors:

- Dogs jumping on a visitor (60%)
- Dogs pawing a visitor (50%)
- Dogs licking a visitor (35%)
- Dogs sniffing a visitor (23%)
- Dogs approaching uninvited (36%)

Indirect behaviors:

- Owners not picking up after their dogs (79%)
- Dogs causing wildlife to flee (57%)
- Dogs flushing birds (46%)
- Owners repeatedly calling their dogs (31%)
- Dogs off trail (18%)
- Dogs “play” chasing another dog (18%)

Respondents were asked about their attitudes towards experiencing those behaviors in open space area. The percentage for each category listed above indicates the percentage of respondents who felt the behavior was a “moderate” or “extreme” problem if it occurred during visitation. Additional analysis of the data indicated that for 9 of the 11 behaviors visitors indicated “no tolerance” norms even for only one occurrence of the behavior. Such a result can be interpreted to mean that the given behavior is unacceptable and there is no tolerance for the behavior if encountered by visitors. The results of the study by Vaske & Donnelly (2007) suggest that the negative behaviors many visitors associate with dogs are not simply minor irritants but could potentially spoil the entire experience for the visitor.

The presence of off-leash dogs affects the park carrying capacity. Carrying capacity is the level and type of recreation use that can be accommodated in a park without violating standards for relevant indicator variables (Manning 2007, p. 25). In terms of the indicator of visitor experience, different user groups probably have widely different tolerance levels of the presence of dogs off-leash. The stratified results of the GGNRA 2002 Survey of attitudes towards leash laws undoubtedly reflect such differences.

A quantitative study by Arneburger et al. (2004) showed that the presence of off-leash dogs in an urban park made a remarkable difference in the degree of tolerance of visitors for crowding in the park. The presence of off-leash dogs decreased the tolerance of visitors to social conditions such as crowding. A certain degree of crowding of visitors that might be acceptable with few or no with dogs off-leash became unacceptable when many visitors had dogs off-leash.

Anywhere in the Presidio where dog walkers and other visitors congregate, the potential exists for visitor tolerance of crowding to be exceeded due to synergistic impacts of off-leash dogs, social crowding, safety concerns, and many other factors. Although there are no studies specifically addressing the idea of carrying capacity in the Presidio, the results of the 2002 GGNRA survey should provide some clues as how certain user groups may view carrying capacity and may be displaced from off-leash dog areas.

The fact that commercial dog walking potentially excludes many user groups and a large proportion of potential visitors must be explicitly discussed in its ramifications for the recreational mission of the Presidio.

Although actual attacks involving dogs biting and knocking down visitors may be relatively infrequent, any exposure to off-leash dogs potentially involves considerable risk. Certain user groups, such as the elderly and young children, are known to be particularly vulnerable to serious injury when bitten by a dog. More troubling, it is not possible to predict when and where a serious attack might occur. One study showed that in the case of serious attacks by dogs on a child, 66% of dogs had never previously bitten a child, and 19% had never bitten any human and 66% of owners had taken their dogs to obedience training classes (Risner et al. 2007). According to Dr. Gail C. Golab, director of the American Veterinary Medical Association's Animal Welfare Division, "Any dog can bite... Even the gentlest dog, if it is physically or mentally unhealthy, is in pain, feels threatened, or is protecting its food or a favorite toy, can bite (quoted in USPS 2011)." When an attack does occur, there is a significant chance of a fatality. One study estimated that a risk of 2 fatalities per 1,000 reported dog bites exists nationwide (Wright 1985).

A dog bite is a common type of injury (Holmquist & Elixhauser 2010). One study found that approximately 1 in 50 patients treated in emergency rooms suffered from a dog bite (Beck et al. 1975). It is estimated that half of all children in the U.S. suffer a dog bite injury by the time they are high school seniors (Dr. Alison Tothy, American Academy of Pediatrics, Illinois Chapter, quoted in USPS 2011). Groups of dogs such as brought by commercial dog walkers may increase the safety risk due to aggression characteristic of pack walking and the increased likelihood of social and re-directed aggression. Visitors to the Presidio who have been bitten by a dog or who recognize the danger of off-leash dogs may well have a fear of dogs that would limit their enjoyment or preclude their visiting an area where off-leash dogs are allowed.

Although few studies seem to exist regarding human psychology and attitudes towards negative behaviors of dogs, you need to recognize that potential safety issues are very real in the minds of visitors and have a significant impact on an individual's psychology and ability to enjoy the visiting experience. Niktina-den Besten (2008) found that the presence of dogs was a significant negative factor in the child's mental map of a neighborhood.

Visitors to areas where commercial dog walking is allowed are potentially subjected to unmitigated encounters with large and powerful off-leash dogs. There is little the visitor can do to mitigate exposure to the risk of being charged or attacked by dogs in such cases. Such encounters can be especially frightening in relatively isolated areas with no cover.

By allowing commercial dog walking, you would essentially be giving a small number of wealthy San Franciscans and other wealthy Bay Area residents a disproportionate share of the use of the Presidio that would displace other visitors from certain groups with dog safety issues and those with low tolerance for off leash dogs.

Sincerely,

Charles Pfister

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**From:** [Renee Pittin](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking in the Presidio - Support  
**Date:** Monday, February 25, 2013 3:54:20 PM

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Dear Mr. Pelka,

I read the proposal concerning dog walking in the Presidio.

Thank you for your intent to incorporate the San Francisco Professional Dogwalker regulations into your management plan. This is important for the families who live in the Presidio, for workers in companies in the Presidio, and for other San Franciscans who appreciate, value and visit the Presidio. I understand that you do not intend unilaterally to change the commercial dogwalker regulations in the future without public comment. However, as the proposal is presently phrased, that is what is implied. I hope that you will change the wording to reflect your intentions.

I hope that you will also work to provide designated off-leash areas and trails in the Presidio. The Presidio Pet Cemetery is an evocative indicator of many decades of pet ownership, responsibility, and compassion in the Presidio community. This is a history which should be honored, and the social relationships and bonds created through real community - neighborhoods of families, including children and pets - should be encouraged and facilitated. This extends also to the companies and corporations which you seek to bring to the Presidio. In almost all of the major companies that are named as "best places to work", the ability to take one's pet to work is one component in the mix. You have the opportunity to enhance working environments and living environments in one fell swoop by providing this designated space.

Dogs have lived in the Bay Area for millennia before the Europeans arrived. Look elsewhere if you are concerned about "damage to the Presidio". Dogs and the uncemented ground they lightly trod are not the problem.

Thank you for your consideration and your time.

Sincerely,

Dr. Renée Pittin  


**From:** [Crima Pogge](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walking in the Presidio  
**Date:** Saturday, January 12, 2013 5:57:04 PM

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Dear Mr. Pelka,  
as a biologist and frequent visitor to the Presidio I am very concerned about the proposal to invite the commercial dog walking industry into Area B of the Presidio granting professional dog walkers, with up to eight dogs each, use of the Presidio's roadways, parking lots, public trails, and open spaces to conduct their business.

I am afraid that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon, similar to what has happened at Fort Funston. Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking lots, and walkers with eight dogs each will be ever-present on public trails and open spaces. I am also concerned that the costs of administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers will be paid for by the American tax payer.

As far as I know, commercial dog walking has never been legally permitted on any of our National Park lands. I am afraid that commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. My understanding is that commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

I urge you to reconsider this plan.

--

Crima Pogge  
Biology Instructor at CCSF

**From:** [Alice Polesky](#)  
**To:** [Pelka, John](#)  
**Subject:** No Dog Walkers in the Presidio  
**Date:** Saturday, January 12, 2013 11:23:18 AM

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Dear Mr. Pelka,

Please do not, not, not allow commercial dog walkers in Area B of the Presidio. In its desire to accommodate the belligerent dog owners and the people who profit from them (people who pay virtually nothing to cover the damages dogs create), more of our precious space is being given away to dogs --- not to wildlife or to people who prefer nature to noise, and often, attacks. People who own dogs have absolutely no right to foist them on the rest of us. Nor are dogs good for wildlife, either:

<http://www.usu.edu/ust/index.cfm?article=48717>

Even four dogs per walker are four too many. The parks belong to us. There may be lots of dog owners in San Francisco, but they are still the minority. Don't let them take over another inch. They have already proved to be completely irresponsible and indifferent to the needs of the rest of the population. Let them find and pay for some barren, remote area so they can walk and toilet their dogs without subjecting nature lovers to the noise, stink, chaos, destruction, and very often fear, which are the only things that they and their animals contribute to the environment.

Thank you,  
Alice Polesky



**From:** [Alice Polesky](#)  
**To:** [Pelka, John](#)  
**Subject:** No Commercial Dogwalking in the Presidio  
**Date:** Tuesday, February 19, 2013 4:54:38 PM

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Dear Mr. Pelka,

I urge that you disallow all commercial dog walkers from the Presidio. Dogs are destructive to the wildlife, and often disruptive -- and even vicious -- to other park users. There is no justification for abusing our publicly financed parks so that private businesses can profit. Many dog walkers cannot control the dogs they are walking and some are even abusive to the people whom their dogs attack. Not that park experience we need, let alone pay for! Let these businesses rent or buy a space that is already environmentally degraded, where the rest of the public will not be harassed, and take the dogs there. Public lands are not about profits for individuals, especially destructive ones, like dog walkers, but mandated, paid for, and conserved for all of us.

Respectfully,  
Alice Polesky



**From:** [Ildiko Polony](#)  
**To:** [Pelka, John](#)  
**Subject:** No commercial dog walking  
**Date:** Tuesday, January 15, 2013 12:53:12 PM

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Hello John Pelka,

Please don't consider allowing commercial dog walking at the Presidio National Park. I treasure the Park as a truly unique piece of urban wilderness and allowing commercial domesticated dog walking in the Presidio would undermine this wildness. I have been a volunteer at the Presidio for about 2 years working to restore this park. I am afraid that commercial dog walking would undermine this work. I love dogs, and they need to get walked, but that's what the cities many dog parks are for. Do not allow commercial dog walking at the Presidio.

Thank you,

Ildiko Polony

**From:** [Heather Potts](#)  
**To:** [Pelka, John](#)  
**Subject:** Please Continue To Allow Professional Dog Walking in Presidio  
**Date:** Friday, January 18, 2013 7:51:46 PM

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I live in *San Francisco* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Heather Potts

Proud owner/ guardian of Cassie, a golden retriever who has brought much joy to many lives.

**From:** [Suzanne Price](#)  
**To:** [Pelka, John](#)  
**Date:** Friday, January 18, 2013 2:28:43 PM

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I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

**From:** [Beth Pruitt](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio dog walking  
**Date:** Thursday, February 21, 2013 9:48:44 AM

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As concerned SF homeowners, dog owners and voting citizens, I am writing to express my concerns for the preservation of access to the Presidio for dog walking. I agree with the positions of Other concerned citizens as stated below.

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

Thank you for your attention to our concerns.

Beth Pruitt and Matt Hopcroft

**From:** [judy](#)  
**To:** [Pelka, John](#)  
**Subject:** Limits on Commercial Dog Walking  
**Date:** Wednesday, November 28, 2012 7:36:52 PM

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I was so happy to read about this proposal. While living in the Presidio in 2006, I was riding my bike to my son's preschool, near Paul Goode Field. A large black dog came out of the scrub, got up on his hind legs, and lunged at me. I shouted at the dog, and was spared. I looked to my right, and the dog walker was lounging under trees with other dog walkers. She offered no apology, and lazily retrieved the dog. If my son was in his bike seat, the result could have been much different.

The prevalence of dog walkers that poorly supervised their charges kept me from enjoying the Presidio many times. We would walk to the beach from our house on Liggett, and dog walkers crowding the beach would inevitably lead to me to picking up my son for his safety. The beach trips were tense, and became less frequent because of dogs.

On the rare mornings I walk along the beach at Chrissy Field, commercial dog walkers are visiting with their dogs, most generally off-leash, and walking eight or more pets. The beach has become a de facto commercial dog walking area.

My children were asked to stop selling lemonade on Liggett Avenue, which is an activity that would harm no one. Dog walkers with too many dogs, and little to no control over them, are allowed to operate their for profit business on NPS lands.

Please adopt the plan to limit Commercial Dog Walking.

Thank you,

Judith Purpura

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** Keep the Presidio Dog Friendly!  
**Date:** Thursday, February 21, 2013 9:41:57 AM

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Dear Mr. Pelka,  
I'm writing to encourage you to keep the Presidio a dog-friendly place.  
It is important that dogs and people continue to enjoy a clean and healthy place to enjoy the outdoors.  
I would be very disappointed if regulations were put in place to limit the open and democratic management of this public area.  
Thanks for your work,  
Susan Quinlan

**From:** [Lon Ramlan](#)  
**To:** [Pelka, John](#)  
**Subject:** Re: Oppose Changes in Presidio Trust  
**Date:** Tuesday, February 19, 2013 2:52:27 PM

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Mr. Pelka,

As a lifetime San Francisco native I am opposed to your proposed changes. We have all lived and played in harmony for years. There have not been any problems so why the change? Everyone has been very responsible in getting along. San Francisco Bay Area residents have been enjoying walking dogs in the Presidio for generations and want to continue to enjoy life with our dogs in the Presidio. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.). We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time.

Lon Ramlan  


**From:** [Rami Randhawa](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walking in the Presidio  
**Date:** Friday, January 18, 2013 3:09:41 PM

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Hello Mr. Pelka,  
I live in Pacific Heights and hike in the Presidio almost everyday with my dog.

This proposal does not come soon enough. Over the last two years specially, there has been an exponential increase in the number of dog walkers with 10-12 dogs in tow. Only last week, as I was walking with my chocolate lab, coming down from inspiration point around a narrow corner, two young woman, working together had about 16 big dogs between them. I took my dog to the side and politely asked the woman leading the first group to please keep one of the dogs away from us as he came over to explore since I was nervous about such a big group. She became extremely abusive, loudly castigating me about my expectations " on the trail". Too often, bags of dog feces are lining the trails with the good intention, I assume of picking them up on the return trip, but are often missed. The presidio is a gem and I, as a dog lover support ALL efforts to use it, but use it responsibly and respectfully.

Thanks

Rami Randhawa

  
Sent from my iPad

**From:** [Lucy Rasmussen](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking in Presidio  
**Date:** Thursday, February 21, 2013 8:19:17 AM

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I do NOT support any changes to the dog walking policies for the Presidio. Do dogs harm the environment? The answer to this question lies in the example of Carmel, CA. Have you seen Ocean Beach-which is free to off-leash dogs? Is it trashed with evidence of dog fouling? No! It is one of the most beautiful beaches on the Ca coast. The town itself is dog-friendly. I have never seen a cleaner or happier place for dogs. Parks nearby are in excellent condition. If you give responsible owners a chance, they will exceed your good expectations! Thanks for your attention to my letter. Lucy R

Lucy Rasmussen, ScD

**From:** [Susan Rebert](#)  
**To:** [Pelka, John](#)  
**Subject:** Support of Prof. Dog-Walking  
**Date:** Friday, January 18, 2013 1:23:33 PM

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I live in *Hillsborough*, and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Susan V Rebert

Sent using 100% recycled electrons

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** Professional Dog Walking in the Presidio  
**Date:** Friday, January 18, 2013 3:24:02 PM

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I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,  
T.S. Reichardt

**From:** [Laura Rende](#)  
**To:** [Pelka, John](#)  
**Subject:** Letter Regarding Federal Dog Management Proposal  
**Date:** Saturday, January 19, 2013 2:53:45 PM

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To Whom It May Concern:

Our family lives in San Francisco very close to the Presidio and support professional dog walking continuing in the Presidio. We have lived in our current location for more than a decade and have supported the transition of the Presidio to the City. As a family and with multi-generations, we cherish our time walking our dogs and have only encountered responsible, professional dog walkers that truly provide needed exercise and socialization for responsible, safe, and humane dog care. We strongly feel that well cared for and loved dogs improve the health, safety, and well-being of the people that live in San Francisco.

In addition, we specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. We also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Laura and John Rende

**From:** [Tony Reveaux](#)  
**To:** [Pelka, John](#)  
**Subject:** commercial dog walking  
**Date:** Saturday, January 12, 2013 11:24:49 AM

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Please;

No  
Commercial  
Dog  
Walking  
!!!!!!!

in our treasured national parks.

*Thank you,*  
**Tony Reveaux**



**From:** [Judy Reynolds](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walking in the Presidio  
**Date:** Tuesday, January 15, 2013 9:54:13 AM

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Fear Mr. Pelka,

Please do not permit commercial dog walking. Even dog owners with dogs on leash endanger the wild life and the impact of the dog walker industry would be far and above the private use. I enjoy walking there now but would not enjoy running into walkers with packs of dogs and there are people who are allergic to dogs and/or afraid of them. There is also the likelihood of vast quantities of waste. I know from walking my own dogs that it can be hard to keep track of when one needs to clean up after them. We have dog parks in the City that are fenced and not in a fragile wildlife habitat. If more space is needed, let the dog walkers pay for additional fenced parks in urban areas.

Judy Reynolds



**From:** [debra riat](#)  
**To:** [Pelka, John](#)  
**Subject:** dogs in presidio  
**Date:** Thursday, February 21, 2013 9:33:22 AM

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Dear Mr. Pelka

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

**I absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment.**

**I disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment, and more damage than people walking without dogs. The Trust cannot make statements like that without providing evidence to support them, and anecdotal evidence does not count.**

**thanks!**

**debra riat**  


**From:** [H ALLAN RIDLEY](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walkers - NO!  
**Date:** Tuesday, February 19, 2013 7:00:58 PM

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The existing presence of virtual "dog teams" on the Crissy field walk and cavorting on the lawn areas is not compatible with the walkers, joggers, bicyclers & dog-owner walkers who presently occupy the area.

Really such a move to allow them is unthinkable.

With best wishes,  
Allan Ridley



**From:** [Mira Ringler](#)  
**To:** [Pelka, John](#)  
**Subject:** Comments re proposed new dog walking regulations in The Presidio  
**Date:** Monday, February 25, 2013 9:10:29 AM

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Dear Mr. Pelka,

It has come to my attention that there are proposals to change the dog walking regulations in The Presidio.

- 1) As a dog owner, I want to continue to enjoy walking my dog in The Presidio.
2. Additionally, as a dog owner who employs a dog walker, I hope that commercial dog walking can continue in The Presidio. I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. As a member of the Crissy Field Dog Group, we absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

Thank you for taking these comments into consideration.

Sincerely,

Mira Ringler

A black rectangular redaction box covering the signature area.

**From:** [Roberts, Warren](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking at the Presidio  
**Date:** Saturday, January 12, 2013 11:29:05 AM

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Dear J. Pelka,  
As a native San Franciscan who is concerned with protecting our precious open spaces, I strongly request that dog-walking be prohibited in the Presidio

Warren G. Roberts

**From:** [Lesly Robinson](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking Permits  
**Date:** Thursday, February 21, 2013 2:06:09 PM

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Mr. Pelka, read the following (many of which you have received, I'm sure) and reconsider. I'm a native San Franciscan, now living in Stinson Beach, and I'm saddened by what is happening in the Bay Area, especially San Francisco, when it comes to dog walking. It's ridiculous that time and energy is wasted on matters such as this, and truly after hearing from the public over and over again about their love of dogs and the freedom of walking them in the Presidio, it amazes me that you and your agency don't seem to listen to public opinion. Do the right thing and abolish this attitude of bureaucratic policy, which at best, is just a waste of the tax payers money. Trust me, you'll sleep better at night knowing you did a random act of kindness. The following is the present concern:

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. What we DON'T SUPPORT is the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, or change, without public comment, any part of the commercial dog walker regulations in the current proposal. The Presido Trust is MANDATED by NEPA (the National Environmental Policy Act) to involve the public through a participatory process before changing regulations such as these.

Respectfully,

Lesly Robinson

**From:** [Ashley Rogers](#)  
**To:** [Pelka, John](#)  
**Subject:** Support for commercial dog walking in the Presidio  
**Date:** Thursday, January 24, 2013 10:35:45 PM

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As a dog owner and Bay Area resident, I support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care, particularly in San Francisco where the majority of residents live in multi-family housing where yard space is limited. Well cared for, exercised, and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Thank you,  
Ashley

**From:** [James Rogers](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking in the Presidio  
**Date:** Friday, January 18, 2013 2:50:44 PM

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I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

James Rogers

San Francisco Voter and Dog Owner

**From:** [Celia Ronis](#)  
**To:** [Pelka, John](#)  
**Subject:** Please do not open the Presidio to commercial dog walking  
**Date:** Saturday, January 12, 2013 11:22:07 PM

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I am opposed to commercial dog walkers in the Presidio.

I have walked and bird watched in an East Bay Regional Park where professional dog walkers are permitted. The peaceful, pleasant atmosphere is destroyed for the visitor coming to enjoy the natural open space provided by the parks. Morning and afternoon the paths are clogged with these dogs. The parking lots near the trails favored by the dog walkers are filled with their cars. The dog walkers are commercial operations that do not offer any benefit to the parks.

It is estimated that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon. Walkers with eight dogs each will be ever-present on public trails and open spaces. The costs of administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers will be paid for by the American tax payer.

Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Celia Ronis

**From:** [Judy Roos](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walkers  
**Date:** Tuesday, January 15, 2013 2:32:48 PM

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Over the last seven plus years I've lived in Baker Beach and South Baker Beach I've noticed more and more dog walkers in our woods and on the boardwalk at Lobos Creek. More often than not all dogs are on leash. Some walkers make no effort to clean up after their charges, leaving the trails very unpleasant. Who will see to it that the rules will be enforced? We can't even get parking rules enforced so I doubt the Park Police will be tasked with this.

I would urge the Trust to limit commercial dog walkers to the current areas of Crissyl

Judy Roos - 

**From:** [Emily Roth](#)  
**To:** [Pelka, John](#)  
**Subject:** no commercial dog walking in the presidio ...  
**Date:** Tuesday, February 19, 2013 2:48:54 PM

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Dear John Pelka,

I would like to register my disagreement with any proposals allowing access to Presidio property for commercial dog walkers and their dogs. I believe that commercial dog walkers and dogs should also be prohibited from using the trails and beaches at Crissy Field and all GGNRA properties. It has become difficult for bird watchers like myself, and runners and others to enjoy these areas when there are just too many dogs in every location around the Presidio property. And many of them are off lease and disrupting bird activities.

Thank you for your consideration of this matter.

Emily Roth

[REDACTED]  
[REDACTED]

**From:** [leewaysf](#)  
**To:** [Pelka, John](#)  
**Subject:** Keep commercial dog walking out of our National Parks.  
**Date:** Saturday, January 12, 2013 6:23:43 PM

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Shocked to hear this is even being considered!

Unruly dogs, not leashed, provoke leashed dogs, and harass birds  
Surly walkers, screaming at dogs to come back to them, cars/trucks full of barking dogs. They do not always pick up poop, or have too many dogs and aren't watching them all carefully

Why would more dogs be allowed in a NP? It's bad enough to have your walk, bird watching, quiet time disturbed for dogs!

I am a dog owner, and follow the rules. The majority of owners, don't; and won't. How would you ever measure compliance? There is never any enforcement of keeping the dogs out of sensitive habitat or picking up dog waste. Just look at how Ft. Funston is only enjoyable for people with dogs.

Thank you for reading this email. I bird in the NP and object to this terrible idea.

Lee Rudin



*Unless someone like you cares a whole awful lot, Nothing is going to get better. It's not.* Dr. Seuss  
"The Lorax"



Please consider the environment before printing this email. Thank you.



**From:** [sandra](#)  
**To:** [Pelka, John](#)  
**Subject:** re presidio trust  
**Date:** Tuesday, February 19, 2013 8:15:57 AM

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mr. pelka

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio. I personally have been walking my dogs for over 30 years and have only seen one incident the whole time, but I do agree that there should be a limit to the number of dogs allowed each dog walker. I also know that they are very responsible and always keep the area clean of feces.

We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

 [sandra russel](#) 

**From:** [Susan Russell](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking Permits  
**Date:** Friday, February 08, 2013 3:12:51 PM

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I am completely opposed to requiring commercial dog walkers to obtain permits.

I live in Marin Co. and walk my one dog often at Crissy Field. I have never seen any commercial dog walker do anything objectionable. I believe you are targeting commercial dog walkers unfairly.

I see far more problems with individual dog owners who do not know how to handle their one, or two, badly behaved dogs. What are you going to do about them? And no, the answer is not banning dogs, the answer is better oversight.

I've seen more badly behaved children and people at the Presidio than I have seen badly behaved dogs. But you can't ban them, unfortunately.

Commercial dog walkers are far more likely to be well behaved, considerate, have control of their dogs and have well behaved dogs than individual owners.

The dogs that are walked by commercial dog walkers live in San Francisco. Each dog's owner pays taxes that goes to support the Presidio.

Targeting commercial dog walkers is unfair and I am completely opposed to it.

Thank you,

Susan Russell

**From:** [Geoff Ruth](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking permits  
**Date:** Friday, January 04, 2013 8:27:47 PM

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Dear Mr. Pelka,

I would like to express my strong support for the proposal to require commercial dog walkers to acquire and have a permit before walking their dogs in Area B of the Presidio trust. I further strongly support that all dog walkers be required to remove dog feces, even if there is not explicit signage -- it is absurd that this is not already a requirement for walking a dog in any area.

I appreciate your work in pushing this forward, in the face of probable opposition from the (sometimes rabid) dog lobby of San Francisco.

Sincerely,  
Geoff Ruth

[Redacted signature block]

John Pelka  
The Presidio Trust  
103 Montgomery Street,  
P.O. Box 29052  
San Francisco, CA 94129

January 16, 2013

Reg: Commercial Dog Walking

Dear John Pelka:

I am writing to express my support of the proposal to require permits for commercial dog walkers, but also to argue that even with a permit, the number of dogs being walked by an individual will remain too high. The permit helps insure that commercial dog walkers understand applicable laws, but too many dogs prevents walkers from even knowing when they have broken the law.

As someone that both lives and works in the Presidio, I understand that it is and will always be a popular place to walk dogs. However, I have seen commercial walkers with 15 or even 20 dogs, and the more dogs you have the harder it is to follow expectations such as the requirement to pick up excrement left by dogs. Simply put, it gets lost in the confusion, until someone else steps on it! Furthermore, since the walkers are not the owners, they have trouble communicating voice control over individual dogs. I propose that all commercial dog walkers be required to get a permit, and that the limit be six dogs.

Sincerely,



Ivan Samuels





**From:** [Kris Schaeffer](#)  
**To:** [Pelka, John](#)  
**Subject:** No commercial dog walking in the Presidio  
**Date:** Tuesday, February 19, 2013 5:42:51 PM

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No commercial dog walking in the Presidio, please. No one benefits.

Kris Schaeffer  
San Francisco resident 40 years

**From:** [david schmidt](#)  
**To:** [Pelka, John](#)  
**Subject:** Please, no professional dog walkers in the Presidio  
**Date:** Monday, January 14, 2013 11:34:44 PM

---

Dear Mr. Pelka,

I understand there is a proposal to allow professional dog walkers to walk up to eight dogs each in the Presidio. I strongly oppose this.

Can you imagine the Crissy Field trail with eight dogs coming at you? Now imagine that you're a toddler with eight huge, 6-foot tall (in their eyes) dogs coming at you. This is a terrifying prospect for parents and children. It's even worse than having two horses coming at you. It's downright dangerous to children. What if one of the dogs gets loose and bites a child? That could be almost a daily occurrence. Please protect the children, and not the professional dog walkers!

This proposal is even bad for dog owners trying to walk their one or two dogs. When a gang of eight dogs passes one or two unfamiliar dogs, there's almost sure to be a dogfight. So this is bad for dogs and dog-owners too. What about runners? They'll be forced to jump out of the way of the eight dogs. Let's not let the Presidio go "to the dogs."  
Keep professional dog walkers OUT of the Presidio.

--

David Schmidt



**From:** [Vicky Schulman](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walkers in the Presidio  
**Date:** Thursday, February 21, 2013 9:42:58 PM

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Hello Mr Pelka,

I wanted to let you and the trust know that I see no reason to ban professional dog walkers from the Presidio. The Presidio is a national recreation area, but it is also part of our city. It should be available for SF residents to enjoy. Joggers, bicyclists and skateboarders annoy me, but that does not make it ok for me to request they be banned. If we choose to live in a city, we have to tolerate those whose interests are different than our own. Unless people are engaging in an activity is actually dangerous or destructive, there is no reason to single them out. There are more dogs than children in SF and dog walkers should be able to enjoy this wonderful resource along with all other SF residents. If dog walkers are following leash law and aren't walking more dogs than permitted , there is no reason to ban them from the park.

Sincerely,  
Vicky Lewolt Schulman

**From:** [REDACTED] [Cameron Scott](#)  
**To:** [Pelka, John](#)  
**Subject:** please preserve off-leash dog walking  
**Date:** Thursday, February 21, 2013 9:19:52 AM

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Dogs need off-leash socializing -- they are natural animals, too -- and having the chance for quality exercise makes them better citizens in the streets of the crowded city.

As a human who loves nature, some of my most positive community and natural experiences have occurred in with my dog off-leash dog areas in and around San Francisco. The other dog owners are responsible and respectful of the natural spaces.

Please, don't turn a solution into a problem by restricting off-leash dog activity in the Trust's lands.

Thank you,  
Cameron Scott

--

Cameron Scott, Reporter  
SocialTimes.com, part of Inside Network

[REDACTED]

**From:** [Jan Scott](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking in the Presidio  
**Date:** Thursday, February 21, 2013 3:58:28 PM

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Mr. Pelka,  
As a San Francisco resident for 45 years, I strongly support continuing to allow dog walking in the Presidio. We have been walking our dogs there for many years successfully, and it allows us and our dogs to stay healthy. I also agree that commercial dog walking should be allowed as your plan states. However, I do not agree that commercial dog walking regulations could be changed in the future without public comment. I think anything as important as this should be subject to public discussion. I also disagree with assertions in the proposal that dogs cause more damage to the environment than people. The Trust should not make such a statement without scientific evidence to support it.

Thank you,  
Joanne Scott

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** Dog walking  
**Date:** Thursday, February 21, 2013 9:34:45 AM

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Please continue to allow dogs to walk in the Presidio. My dog loves to sniff everything and every one that walks there and it would break my heart to have to say no to her.

Thank you,  
Mac Senour

**From:** [Avrum Shepard](#)  
**To:** [Pelka, John](#)  
**Subject:** Professional (or Commercial) Dog Walking Permits in the Presidio  
**Date:** Sunday, February 24, 2013 2:44:01 PM

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San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio. I urge the Trust to designate areas for off-leash dog walking within its land.

I support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.). It's nice to see the professional dog walkers able to financially support themselves, recreate, and provide a needed service. Small business needs to be supported in our city.

I oppose the idea that the Presidio Trust can change the Commercial Dog Walker permit regulations contained in the proposal at any time in the future without having to take additional public comment. This added public process should be explicitly included in the wording of the proposal where it says the Trust can revise the regulations should they decide changes are appropriate. Because it was not explicitly stated, an argument could be made that the proposal gives the Presidio Trust the ability to change the regulations without further public comment. This point -- that the Trust must take additional public comment should they decide to make any changes to the regulations at any point in the future -- made in a verbal phone call from John Pelka should be clarified in writing before the proposal is adopted.

I disagree with assertions in the proposal, stated without evidence or data to support them, that dogs cause "damage" to the environment. The Trust cannot make statements like that without providing evidence. Anecdotal evidence does not count.

Avrum Shepard

**From:** [Jake Sigg](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walking in Presidio  
**Date:** Friday, January 18, 2013 9:29:20 AM

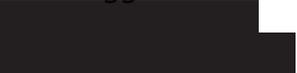
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To: Presidio Trust

San Francisco is the third densest city in the United States, after New York City and Jersey City. Yet (I think) it has the largest per capita dog population.

I sympathize with those who want to exercise their dogs, as they do need it. But that is not the Presidio Trust's responsibility. Its responsibility is to preserve the natural resources, provide passive recreation, and other compatible uses. Commercial dogwalking is inconsistent with these ends, detracts from others' park experiences, and brings a host of unintended consequences.

Surprisingly--in spite of our being the third densest city--some people bring their dogs *daily* from Palo Alto and the East Bay to run them in Fort Funston and Bernal Hill. Why? San Francisco, including the Presidio and the GGNRA, are hospitable to dog running. But it's at cost to other legitimate uses which are consistent with your mandate.

Jake Sigg  


**From:** [Bill Simpich](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial dog walks? No way.  
**Date:** Tuesday, January 15, 2013 1:35:06 AM

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The protection of the commons is a precious thing. Do not let the forces of the dollar move in and use up our precious space. I own two dogs and I use a dog walker on occasion. No way would I ever ask a commercial dog walker to do anything like what is suggested here. It is, literally, stealing from the people.

What makes a bad idea even worse is the notion of walking eight dogs at a time in a protected area. That is an incredibly difficult job to do. I know, I often walk three dogs at a time and that is no easy task. Cleaning up after them, chasing after them, keeping the peace, etc.. Eight dogs at a time is a terrible idea in the best of situations.

Commercial dog walkers have the entire city to use to make their living. Don't let them make their money in an abusive way on public lands.

Bill Simpich  


**From:** [PATRICK SKAIN](#)  
**To:** [Pelka, John](#)  
**Subject:** No Commercial Walking in the Presidio Please: Skain  
**Date:** Saturday, January 12, 2013 12:49:46 PM

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Dear Mr. Pelka: It would be the greatest folly and outright abrogation of stewardship responsibilities to allow the commercial dog walking industry into Area B of the Presidio. In my years of experience, the professional dog walkers interpret all rules liberally or outright ignore them. I routinely see professional dog walkers with one or two dogs on leash while the rest run free. They believe mistakenly that they have "voice control" of their animals so it's OK; but it is not legal nor appropriate. Also, nothing deters them once they believe they have achieved dominance over an area or trail. They refuse to cooperate or police one another. Any attempt at enforcement is met with contempt; and the expense to provide park personnel to oversee these areas regularly would be prohibitive. Caving in to the dog advocates for a trial period would likewise border on lunacy. Just say no and you will be serving the best interest of the National Parks. If you would like a prime example just visit Pine Lake Park situated adjacent to Stern Grove in San Francisco. The West end of Pine Lake Park is designated a Significant Natural Resource Area and by code dogs are required to be on leash at all times. However this area is regularly occupied by commercial dog walkers with their animals off leash which leads to extensive damage to park resources. It would be a neglect of duty for the Presidio Trust to advocate for dogs or promote access to this national treasure to the commercial dog walker industry. Sincerely, Patrick Skain. [REDACTED]

**From:** [Scott Snow](#)  
**To:** [Pelka, John](#)  
**Subject:** I support Presidio Trust Professional Dog Walking  
**Date:** Thursday, February 21, 2013 6:38:35 AM

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Hi John,

> 1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

>

> 2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

>

> 3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future without further public comment

**From:** [Jane Solano](#)  
**To:** [Pelka, John](#)  
**Subject:** commercial dog walking in NP's  
**Date:** Sunday, January 13, 2013 9:58:42 AM

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Dear Mr. Pelka,

I am strongly opposed to allowing commercial dog walking in our national parks. Considering the effects of dogs in natural areas and that professional dog walkers would be taking up to 8 dogs at a time into these areas, it just doesn't make sense. I feel stewards of national parks should be dedicated to preserving, not ruining, the natural beauty and the serene experience that they offer those of us walking through it. Dogs just ruin that.

Please work to support my position against dogs in national parks. I appreciate it.

Sincerely,  
Mrs. Jane Solano



**From:** [Yvonne Soria](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio Call to action dog walking rule  
**Date:** Thursday, February 21, 2013 11:03:55 AM

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Dear John Pelka,

I am writing this email in support of San Francisco dogs walkers in the Presidio.

1. San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.
2. We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).
3. We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.

Thank you,  
Yvonne Soria  
Yvonne

**From:** [kathryn.spence](#)  
**To:** [Pelka, John](#)  
**Subject:** NO to dog walking in National Park lands  
**Date:** Saturday, January 12, 2013 9:24:11 PM

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Dear Presidio Trust,

Please do not allow commercial dog walking in our national parks.

The environment and visitors will be adversely affected.

Thank you,

Kathryn Spence



**From:** [Leann Speta](#)  
**To:** [Pelka, John](#)  
**Subject:** Re: Dog walking permits  
**Date:** Friday, January 04, 2013 8:35:59 PM

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Dear Mr. Pelka-

I understand that you are considering a proposal that would require commercial dog walkers to acquire and have a permit before using Area B of the Presidio Trust and wanted to express my support of this proposal. I was surprised to learn that it isn't already required that dog walkers remove dog feces and strongly encourage this to be obligatory.

I appreciate your efforts to protect our natural spaces..

-leann speta  


**From:** [SharonSS](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walkers/National Parks  
**Date:** Monday, January 14, 2013 6:47:30 PM

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Dear Mr. Pelka,

I agree with the following statement. Please do not allow commercial dog walkers to take over our National Park. As the victim of an attack by three vicious dogs I look to the Presidio as a safe area to walk and enjoy.

Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Thank you.

Sharon Starr



**From:** [Katrina Steffek](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking continuing in the Presidio  
**Date:** Friday, January 18, 2013 2:40:25 PM

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Hello,

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,  
Katrina Steffek

**From:** [Sandy Steinman](#)  
**To:** [Pelka, John](#)  
**Subject:** Please do not allow commercial dog walkers in the Presidio  
**Date:** Saturday, January 12, 2013 5:08:08 PM

---

I am opposed to commercial dog walkers in the Presidio. it is estimated that hundreds of dogs will be walked by dozens of professional dog walkers every day throughout the Presidio, morning and afternoon. Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking lots, and walkers with eight dogs each will be ever-present on public trails and open spaces. The costs of administration and oversight, additional law enforcement, additional resource maintenance, additional public relations, and the loss of legitimate park visitors and volunteers will be paid for by the American tax payer.

Commercial dog walking has never been legally permitted on any of our National Park lands. Commercial dog walking will impact all park user groups and set a dangerous precedent for all National Park lands. Commercial dog walking is contrary to the purpose and mission of our National Parks and contrary to the Presidio Trust Management Plan.

Sandy Steinman

**From:** [Sandy Steinman](#)  
**To:** [Pelka, John](#)  
**Subject:** no to commercial dog walking at the presidio  
**Date:** Tuesday, February 19, 2013 4:59:59 PM

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Commercial dog walking is not an appropriate use of our National Park lands.

**From:** [Barbara Stuart](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walking in Presidio  
**Date:** Thursday, February 21, 2013 2:06:34 PM

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Dear Mr. Pelkaat:

San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, any part of the commercial dog walker regulations in the current proposal.

Respectfully,

Barbara Stuart



**From:** [Mary Jo Sutton](#)  
**To:** [Pelka, John](#)  
**Subject:** No to commercial dog walking in our National Parks  
**Date:** Wednesday, February 20, 2013 1:00:56 PM

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Dear Mr. Pelka,

I am writing to express my concern about allowing commercial dog walkers in the national parks. I used to work at Fort Baker and experienced many professional dog walkers on the grounds there. They come with a car full of dogs and are unable to adequately control them or pick up after them. The park is a preserve which is not suitable for such a disruptive animal group.

I urge to not allow commercial dog walkers on park lands.

thank you so much for listening,

Mary Jo Sutton



**From:** [Shelley Sweet](#)  
**To:** [Pelka, John](#)  
**Subject:** Proposed rules for dog walking  
**Date:** Thursday, February 21, 2013 2:07:37 PM

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Dear Mr. Pelka,

I am a San Francisco Bay Area resident that has enjoyed walking my dogs for personal recreation in the Presidio for over 40 years. I want to continue to enjoy walking with my dogs in the Presidio.

I also support the continued use of commercial dog walking in the Presidio, which has been going on for decades. It allows dogs to stay healthy and well-behaved during the week when their owners are at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

I absolutely oppose the part of the proposed rule that says the Presidio Trust can change the City of San Francisco's Ordinance (Commercial Dog Walking permit) at any time in the future, and without further public comment, as well as any part of the commercial dog walker regulations in the current proposal.

Please take into consideration the critical needs of dog-walkers as you work on proposed rules for dog walking in Area B.

Thank you.  
-Shelley

Shelley Sweet  


**From:** [kirra.swenerton](#)  
**To:** [Pelka, John](#)  
**Subject:** Comments on commercial dog walking permits  
**Date:** Friday, February 01, 2013 10:29:30 AM

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I strongly oppose the proposal to permit commercial dog walking in the Presidio. I am an open space manager in the bay area and have many years of direct experience with commercial dog walking operations and their highly destructive impact on the land. Use of the Presidio by the commercial dog walking industry constitutes an exploitation of park lands for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience. Commercial dog walking vehicles will have a ubiquitous presence on the roadways and parking areas, and walkers with eight dogs each will ply the public trails and open spaces. I have observed that when commercial operators move into an area, private individuals who are walking their own dogs are displaced and pushed into peripheral and off-limits areas.

Furthermore, commercial walkers with large packs of animals frequently cannot control all the dogs in their group, cannot maintain voice control, allow many of their wards off leash, allow dogs to dig and chase protected wildlife and are not able to keep track of picking up all the dog feces. Large groups of dogs spread out over trails and are intimidating to children and the elderly. Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will impair park resources, and will serve only private enterprise at the expense of the American public.

Sincerely,

Kirra Swenerton

[REDACTED]

[REDACTED]

**From:** [Jane Sylvester](#)  
**To:** [Pelka, John](#)  
**Subject:** commercial dog walking in the Presidio  
**Date:** Tuesday, January 29, 2013 5:16:42 PM

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I do not think the Presidio or any public or regional park is an appropriate area for commercial dog walking. I say this as a person who has been attacked and very badly bitten by dogs in a regional park who were behaving as a pack. It is not natural or comfortable for dogs to be walked in large groups like that. Their behavior is unpredictable as a result. Please do not allow this. In addition I believe that dogs off leash should not be allowed except in areas specified for dogs and dog owners. I love dogs, but strongly feel they have their place. Small children, adults and seniors health and safety would be jeopardized by allowing commercial dog walking or off leash areas.

js

**From:** [Suzanne Taunt](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walking in the Presidio  
**Date:** Tuesday, January 15, 2013 8:07:38 AM

---

NO to professional dog walking in the Presidio. What are you and others thinking....?

The cost to the tax payer is inestimable.

No, no ,no to professional dog walking in the Presidio.

Suzanne Taunt



Sent from my iPad

**From:** [Sidney Tarlow](#)  
**To:** [Pelka, John](#)  
**Subject:** re: commercial dog walking permit..  
**Date:** Thursday, February 21, 2013 10:51:58 AM

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San Francisco Bay Area residents have been enjoying walking our dogs in the Presidio for generations and want to continue to enjoy recreating with our dogs in the Presidio.

We support the continued use of this form of recreation, i.e., commercial dog walking in the Presidio, which has been going on for decades. It allows us to keep our dogs healthy and exercised during the week when we're off at work. There are plenty of other commercial companies doing business in the Presidio (Letterman Digital Arts Center, Sports Basement, The Thoreau Center, SF Film Society, SF Psychotherapy Group, Presidio YMCA, the House of Air Trampoline Park, etc.).

We absolutely oppose the part of the proposed rule that says the Presidio Trust can change the Commercial Dog Walking permit regulations contained in the proposal at any time in the future, and without further public comment.

**From:** [Delia Taylor](#)  
**To:** [Pelka, John](#)  
**Subject:** Professional dog walkers  
**Date:** Saturday, January 12, 2013 7:36:07 PM

---

Dear Mr Pelka,  
Professional dog walkers should not be allowed everywhere in our public parks .

Sincerely,

Delia Taylor  


**From:** [irene tenney](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog walker regulations needed  
**Date:** Thursday, January 24, 2013 4:21:41 PM

---

Hello:

I believe that a dog walker should be CERTIFIED by the city he/she works in or some other state organization that will require a card, badge or some such identification. Continuing education every two years and payment of reasonable business fees to the city.

For the government: a record of incidents where the dog walker was involved and the results of an investigation or finding if any.

No more than FOUR DOGS in his/her walking care.

Demonstration of total voice and hand signal control of dogs in his/her charge and mastery of equipment.

Pick up dog refuse.

Irene Tenney  
German Shepherd Rescue member  
Canine Behavior Academy graduate

German Shepherd Dogs are not pets: they're soul mates.

**From:** [Kristy Thornton](#)  
**To:** [Pelka, John](#)  
**Subject:** Support for Professional Dog Walking in the Presidio  
**Date:** Monday, January 21, 2013 9:47:59 PM

---

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City. My wonderful professional dog walker is the primary reason that my dog (and therefore my household!) is calm and happy during the work week.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Kristy Alvarez Thornton  


**From:** [Richard](#)  
**To:** [Pelka, John](#)  
**Subject:** Dog Walking  
**Date:** Friday, February 08, 2013 4:40:44 PM

---

Hi John,

The proposed ordinance is pure common sense. Commercial dog walkers need to be licensed and responsible for their actions everywhere in the City including (and especially) the Presidio.

Richard Tilles

**From:** [Trace Urdan](#)  
**To:** [Pelka, John](#)  
**Subject:** Public Use Limit on Commercial Dog Walking  
**Date:** Wednesday, November 28, 2012 9:13:50 PM

---

The proposal represents a useless and unnecessary burden on lawful commercial and entrepreneurial commerce. At a time when so many are seeking Gainful Employment this proposal is ill conceived. The licensing fee represents a tax, enforcement an unnecessary expense that detracts from more useful activities for Park Police. Any nuisance created by unskilled dog walking is surely covered by other existing statutes. Please reject this foolish proposal.

Trace Urdan  


Sent from my iPad

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** I Support professional dog walking continuing in the Presidio  
**Date:** Monday, January 21, 2013 1:46:21 PM

---

I live in San Francisco and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Glenn Visgitus

[REDACTED]

[REDACTED]

**From:** [Rudyard Wallen](#)  
**To:** [Pelka, John](#)  
**Subject:** Dogs in the Presidio  
**Date:** Tuesday, February 19, 2013 5:28:42 PM

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Hi John,

I'm writing to add my voice to this issue. As a former (and I hope, future) dog owner, I see how most people cannot manage their single or pair of dogs. Also, we have a tendency to think that rules, laws, and guidelines apply to others, just "not to me".

I thin kit would be a disaster to allow dogs in the Presidio, and it would set a bad precedent for other similar protected areas.

thanks

Rudyard Wallen  


December 20, 2012

Via U.S. Mail and email

Mr. John Pelka  
The Presidio Trust  
103 Montgomery Street  
P.O. Box 29052  
San Francisco, CA 94129  
Email [jpelka@presidiotrust.gov](mailto:jpelka@presidiotrust.gov)

Re: Commercial Dog Walking proposal in Area B of the Presidio

Dear Mr. Pelka,

Thank you for this opportunity to comment on the proposal for commercial dog walking in the Presidio. The Presidio is known for its diversity of wildlife including the 300 species of birds, 30 butterflies, 60 bees and 330 native plant species. People come to enjoy the Presidio. People enjoy the Presidio as described on the website as “an oasis of nature where wild open spaces and places shaped by people welcome the community to explore, play, learn, volunteer, and find refuge. In an afternoon hike one can experience the native plant communities of pre-urban San Francisco as well as the grandeur of cypress groves planted by the Army to break the powerful ocean winds. This exceptional diversity is what attracts visitors - from hikers to migratory birds - to the park.”

This proposal does not benefit the residents, visitors or wildlife in the park; instead this proposal detracts from the park experience. Commercial dog walkers are making money and taking a toll on the park which is diminishing the experience for park visitors. The commercial dog walkers are not taking public transit or bikes to the Presidio but instead are arriving in large vehicles. Commercial dog walking will have a negative impact on the wildlife that lives in or migrates through the Presidio. Taking four or more dogs twice a day will lead to more problems of erosion, loss of plants from urine, possible domestic pet wildlife or human impacts. Ground nesting birds and birds stopping on their migratory routes to or through the Presidio will be negatively impacted. People enjoy walking in the park but do not enjoy seeing the bagged or un-bagged feces left along the trails. This will lead to either a degraded Presidio or increased Park resources required to pick up feces left in the park and requirement for restoring the land, water and native wildlife. Area B is the interior part of the Presidio but the watershed leads to the lagoon and San Francisco Bay or Pacific Ocean. The feces can harm humans and wildlife and lead to algal blooms.

If commercial dog walking is allowed it should be limited to paved parking areas only. This will minimize the impact to wildlife and make any feces easier to scoop and flush<sup>1</sup> and less of a Park resource issue to retrieve and dispose of on a daily basis.

Thank you for considering these comments.

Sincerely,



Noreen Weeden



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<sup>1</sup> EPA After the Storm - Stormwater Pollution Solutions 2007\_04\_30

**From:** [Wehrheim, Joseph](#)  
**To:** [Pelka, John](#)  
**Subject:** dog walk proposal  
**Date:** Monday, February 11, 2013 7:30:00 AM

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Mr. Pelka,

Getting dogs on leash is the key.

Even so, there are still irresponsible, rogue dog-walkers with dogs chasing joggers and children. How can any rule be enforced?

In addition, some of the worst incidents occur with non-dog-walkers having their “friendly” dogs off-leash. A leash rule should be extended to all dogs.

Sincerely,  
Joe Wehrheim

**From:** [REDACTED]  
**To:** [Pelka, John](#)  
**Subject:** No on Commercial Dog Walking  
**Date:** Wednesday, January 30, 2013 8:27:14 AM

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Use of the Presidio by the commercial dog walking industry constitutes an exploitation of park lands for private financial gain, a use that is not compatible with the preservation of park values, park resources, and the park visitor experience.

Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will impair park resources, and will serve only private enterprise at the expense of the American public.

I agree with these statements.

If some licensing is done, I'd propose limits of three dogs per walker, and a max of 10 walker trips per day.

Teresa Welborn

[REDACTED]

**From:** [Jacalyn White](#)  
**To:** [Pelka, John](#)  
**Subject:** Professional Dog Walkers in Presidio  
**Date:** Friday, January 18, 2013 2:46:47 PM

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I work in San Francisco full-time and have employed a professional dog walker for 10 years now. My dog is happier, healthier and much better socialized around other dogs because of the services a professional dog walker provides. It is so important for the professionals to have large spaces to walk dogs in SF. The laws that limit each walker to 8 dogs are fair, reasonable and make sense to be implemented in the Presidio. Thanks for your attention.

Jacalyn White

**From:** [Jenna Whitman](#)  
**To:** [Pelka, John](#)  
**Subject:** Presidio Trust - dog rules  
**Date:** Friday, January 25, 2013 6:34:50 AM

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I live in *Oakland, CA* and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

-Jenna Whitman  


**From:** [samuel wilson](#)  
**To:** [Pelka, John](#)  
**Subject:** commercial dog walking out of our National Parks  
**Date:** Tuesday, January 15, 2013 11:23:47 AM

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Hello,

Please keep commercial dog walking out of our national parks. Dogs already have more than enough parks to go to and very little regulations to follow, which are rarely followed. There will be more run in with coyotes and thus less habitat for them.

Thank you for your time,

S.K. Wilson

*"We do not inherit the Earth from our parents, we borrow it from our Children."*

-Native American Proverb

**From:** [Stewart Winchester](#)  
**To:** [Pelka, John](#)  
**Subject:** Stop The Commercial Use of Public Lands!!  
**Date:** Tuesday, January 29, 2013 10:27:38 PM

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Dear Sirs/Madams: As a dog lover, i find the dog-walking business of doing their business on Public Properties set aside for Historic Preservation, quite intolerable. As a Conscious Capitalist, i find the 'free-pass' of private concerns degrading the grounds without compensation, an inappropriate subsidy. A fee structure should be set up to collect for damages to every tree and grassy area that will not show the damage immediately upon infraction. Assessments of these Commercial Enterprises to protect the 'Commons' seems the only the only way to pay for the enforcement of 'Common Sense'! As a Horticulturalist, i must speak for the living green entities that can neither run from dogs nor bark their displeasure in those moments of what must be sheer terror.....'land-mines' in reverse!

Yours respectfully  
Stewart Winchester

**From:** [Ann York](#)  
**To:** [Pelka, John](#)  
**Subject:** RE: 2-Minute Action: Support Professional Dog Walking in the Presidio - due 1/25/13  
**Date:** Saturday, January 19, 2013 9:12:27 AM

---

I live in Pacifica and support professional dog walking continuing in the Presidio.  
**Professional dog walkers provide needed exercise and socialization for responsible, safe, and humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.**

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

Ann York Albert

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Date: Fri, 18 Jan 2013 15:17:51 -0600  
 Subject: 2-Minute Action: Support Professional Dog Walking in the Presidio - due 1/25/13  
 From: saveoffleashdogs@gmail.com  
 To:

**Hi All,**

**Please take a few minutes to email to support professional dog walking in the Presidio.**

The native plant advocates are encouraging their followers to write comments opposing commercial dog walking in the Presidio. Note this particular ruling only applies to the Presidio Trust Area B, which doesn't include areas managed by the NPS/GGNRA (e.g. Crissy Field).

**Basically, the Presidio Trust proposes adopting the same regulations as apply to San Francisco city parks and honoring the City's commercial dog walking permits.** The major new restriction for professional dog walkers is the maximum of eight dogs. The official summary of the proposed ruling is [HERE](#).

**No matter where you live, it is most important to send a comment on this Federal dog management proposal and a 2-minute suggestion is below.** Even better is to personalize your comment with your own insight and background (e.g., children, senior, minority, disability, etc.); make sure to say you support commercial dog walking continuing in the Presidio.

**DEADLINE: Friday, January 25, 2013**

**EMAIL TO: [jpelka@presidiotrust.gov](mailto:jpelka@presidiotrust.gov)**

**2-MINUTE COMMENT SUGGESTION:**

I live in <Your City> and support professional dog walking continuing in the Presidio. Professional dog walkers provide needed exercise and socialization for responsible, safe, and

humane dog care. Well cared for and loved dogs improve the health, safety, and well-being of the people that live in the City.

I specifically support the Presidio Trust's proposal for public use limits on commercial dog walkers in Area B of the Presidio. Adopting the same regulations as the City & County of San Francisco is reasonable and appropriate for the Presidio Trust lands. I also support the regulations requiring dog guardians to properly dispose of pet feces.

Regards,

\*\*\*\*\*

**About the Author:** This e-mail is authored by Arnita Bowman, who enjoys the GGNRA and Bay Area parks with her family, including the family dog, and is a member of several Bay Area organizations that are working to preserve open-spaces for all people, including those that enjoy both on-leash and off-leash dog recreation.

**Cancellation:** To be removed from this email distribution, please respond to [saveoffleashdogs@gmail.com](mailto:saveoffleashdogs@gmail.com) with "Cancel" in the subject line. Thank you for your support in keeping the Bay Area people and dog-friendly.

**From:** [Karl Young](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking  
**Date:** Thursday, February 07, 2013 9:55:10 AM

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Dear Mr. Pelka,

I was sorry to hear about the recent proposal to allow commercial dog walking in the Presidio.

I already limit my time in the Presidio due to the plethora of off leash dogs and jokingly refer to the Presidio as the largest off leash dog park in the US. It's sad that one of the most beautiful urban parks in the world is already off limits to many who find it difficult to deal with all too frequent aggressive off leash dogs. Though most dog owners are responsible, in a city the size of San Francisco it only takes a tiny percentage of irresponsible ones to deter many from the Presidio.

I realize how difficult it is for the Trust to balance the interests of so diverse a set of stake holders while trying to remain economically viable (which seems an unfortunate precedent for National Parks in my view). But allowing commercial dog walking will be the last straw in terms of keeping me out of the Presidio and supporting any of the associated organizations. The combination of large sets of dogs brought in by professional walkers with the already large number of off leash dogs will so completely undermine the experience of enjoying a beautiful urban park that it's hard to imagine who but a few dog owners will choose to visit.

Thanks for your consideration of public comments. Cheers,

Karl Young

[REDACTED]

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Karl Young

[REDACTED]

**From:** [stan zeavin](#)  
**To:** [Pelka, John](#)  
**Subject:** oppose commercial dog walking  
**Date:** Friday, January 25, 2013 4:07:38 PM

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John Pelka  
The Presidio Trust  
103 Montgomery Street,  
P.O. Box 29052, San Francisco, CA 94129

dear sir,

i strongly urge the presidio trust not to invite the commercial dog walking industry into section B of the presidio. commercial dog walking has never been legally allowed on national parks land. the extra staff needed, and, the loss of revenue due to an expected drop in visitors will necesssarily be picked up by the american taxpayer.

PLEASE SAY NO!

thank you,

stan zeavin  


**From:** [JoAnn Zlatunich](#)  
**To:** [Pelka, John](#)  
**Subject:** Commercial Dog Walking Comments  
**Date:** Friday, February 22, 2013 9:59:58 AM

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John Pelka, The Presidio Trust,  
103 Montgomery Street,  
P.O. Box 29052, San Francisco, CA  
94129.

Dear Mr. Pelka,

As park supporters we have a keen interest in preserving park resources and upholding National Park values. We are writing to offer our comments on the Presidio Trust's proposed *Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions*.

**1) Commercial dog walking should not be permitted in the Presidio.** By the standards of the National Park Service Management Policies 2006 and the Presidio Trust Management Plan, commercial dog walking is not an appropriate use of our National Park lands. Commercial dog walking will adversely impact public safety, environmental and scenic values, natural and cultural resources, and the avoidance of conflict among visitor use activities. Commercial dog walking is not consistent with existing plans for public use and resource management, will provide no service or benefit to any park users, and will serve only for the capital gain of private enterprises at the expense of the American public.

**2) All Dog Walkers Should Be Equally Limited.** All dog walkers within the Presidio should be equally limited to a number of dogs that can be reasonably managed in a manner which is consistent with all Federal regulations, consistent with sound principles of land use planning and management, and in keeping with the vision and objectives as set forth in the Presidio Trust Management Plan.

**3) We support the revised disposal conditions.** Regulations that require the removal and appropriate disposal of dog waste should be adopted and implemented as soon as possible.

Most sincerely,

Matthew & JoAnn Zlatunich



Matthew Zlatunich



January 20, 2013

John Pelka, The Presidio Trust,  
103 Montgomery Street,  
P.O. Box 29052, San Francisco, CA  
94129.

Dear Mr. Pelka,

As an avid supporter of the Presidio, the GGNRA and all our National Parks I am deeply concerned about the Presidio Trust's proposed *Public Use Limit on Commercial Dog Walking; Revised Disposal Conditions*. It is perplexing to me why the Trust is claiming a need to *limit* commercial dog walking when there are already regulations in place that prohibit such activity, specifically 36 CFR 1005.3, 1005.6, and 1005.13. This type of commercial exploitation is a non-compatible use that will compromise the nature and characteristics of the Presidio and may cause significant physical damage to it. Commercial dog walking will provide no service or benefit to any park users, will displace park visitors from trails and other areas of the park, will adversely impact park resources, and will serve only for the capital gain of private enterprises at the expense of the American public.

In my own personal experience, I have had too many negative encounters with dog walkers within the Presidio, both recreational walkers and handlers with large groups of dogs. I have been barked at, snarled at, chased and bitten. Often times these encounters have left me with an accelerated heart rate and an adrenaline rush that altered my mood from peaceful contemplation to frustration and disgust. There are now areas of the Presidio that I avoid because of the predominance of dogs.

If commercial dog walking is permitted within the Presidio more of the trails and open spaces will be dominated by dog walkers and the commotion and problems that they generate, the ambiance of the Presidio will be that of a dog park, and the National Park experience will be diminished for all.

Sincerely,

Matthew Zlatunich