Dear Waterfront Committee Members:

It has come to my attention that you received a letter from Norman La Force, on behalf of the Sierra Club, claiming to relate his experience on the GGNRA Negotiated Rulemaking Committee on dog policy in the GGNRA. I served as San Francisco Dog Owners Group (SFDOG) representative on that Committee and attended all Committee meetings. Mr. La Force’s letter requires correction. Mr. La Force’s relevant paragraph is:

"I served for two years on a committee attempting to create a negotiated rule for off leash dog use in the Golden Gate National Recreation Area, now the Golden Gate National Park. The off leash advocates brought the negotiations to an end after rejecting any proposal that limited off leash dog use in any portion of the Park. They insisted that all areas even those like the plover habitat that were being destroyed by off leash dog use, were to be open to them. We in the environmental community offered various compromise positions that included allowing off leash dog walking in major areas of the Golden Gate National Park, and each proposal was rejected with the same response: Off leash dogs get to go everywhere and there will be no compromise. The entire process collapsed."

Mr. La Force’s account is factually false in every respect.

1. It is still Golden Gate National Recreation Area, not GGNPark. Mr. La Force doesn’t have the authority to change the name and Congress declined to follow his directions on the matter.
2. Mr. La Force’s participation on the NR Committee was marginal. He attended 3 of 7 general Committee meetings and 1 of 9 Technical Subcommittee meetings. There were no other committee meetings.
3. The environmental organizations, including Sierra Club, presented absolutely no proposals to the Committee regarding where dogs should be allowed at any of the GGNRA sites. Mr. La Force’s, “various compromise positions that included allowing off leash dog walking in major areas of the [GGNRA],” is a complete fiction. There were no such proposals for off leash advocates to reject, and nothing for the off leash advocates to compromise with.
4. Off leash advocates presented detailed proposals, in writing with maps and diagrams, for all the GGNRA sites at issue. These proposals contained compromises with current off leash regulation in the GGNA. The proposals were intended to start discussion; further compromise was expected. The environmental groups refused to discuss site specific proposals, and offered no counter proposals.
5. Off leash advocates never suggested that off leash dogs should be allowed everywhere in the GGNRA, as Mr. La Force alleges. Less than 1% of GGNRA’s 75,000 acres was on the table for discussion, and the question for the committee was: Where in this 1% would off leash dogs be
6. Off leash advocates did not bring the Committee’s efforts to an end. The end of Negotiated Rulemaking was determined by GGNRA and announced by them in advance. Off leash advocates would have stayed longer.

7. There was one GGNRA site for which the Committee reached consensus between off leash advocates and the environmental groups: Oakwood Valley in Marin County. The Committee, at its final meeting, worked with a proposal prepared and presented by the off leash advocates, modified it greatly (“compromised”) at the insistence of the environmental groups, and reported consensus to the Department of the Interior. This one small example by itself belies Mr. La Force’s entire account regarding who made proposals and who didn’t, who compromised and who didn’t.

There are minutes for the Negotiated Rulemaking Committee and Technical Subcommittee meetings. They will confirm my version, and refute Mr. La Force’s version of events.

Best Regards,

Keith McAllister
keithzmcallister@comcast.net