

- 1) The proposed 2019 Superintendent's Compendium seems to be implementing aspects of the terminated Dog Management Plan

#### **A) Definition of Voice Control (p.4)**

2017 – "Voice Control means dogs are within earshot and eyesight of the owner/handler and respond immediately to commands to return to leash when called." That's all it says.

2019 – "Voice Control means a dog that is within earshot and eyesight of its owner or handler and that responds immediately to commands to return to leash when called or signaled. The owner or handler must demonstrate this ability when requested to do so by an authorized person. A dog not meeting these requirements will be considered running-at-large under 36 CFR, Section 2.15(d)."

**GGNRA added that you have to demonstrate immediate recall when requested by an authorized person, which was in the Dog Management Plan, but not in 2017 Compendium. Plus, there is no definition of an "authorized person."**

NOTE: 26 CFR, Sec 2.15(d) says: "Pets running-at-large may be impounded, and the owner may be charged reasonable fees for kennel or boarding costs, feed, veterinarian fees, transportation costs, and disposal. An impounded pet may be put up for adoption or otherwise disposed of after being held for 72 hours from the time the owner was notified of capture or 72 hours from the time of capture if the owner is unknown."

**So the GGNRA is proposing to impound dogs that do not come immediately when called by the owner/handler when asked to do so by an "authorized person."**

**GGNRA added leash no longer than six feet, and adds much more detail other than just can't "harass any person or animal".**

#### **B) Definition of Unmanaged Dog (p.4)**

2017 – "Unmanaged Dogs means dogs that annoy, harass, or attack people, wildlife, livestock or other dogs, are presumed to be not under control."

2019 – "Unmanaged Dog means a dog that annoys, harasses, harms or threatens a person in a manner that a reasonable person would find annoying, harassing, harmful or threatening, or that annoys, harasses, harms or threatens another animal or harms park resources. This includes threatening behavior by dogs towards people or other animals such as snarling, snapping, chasing, charging, directed and sustained barking at, or uninvited taking or attempting to take food from another visitor or pet."

**GGNRA uses the standard of what a "reasonable person" would find annoying, or threatening. But**

**what a person with experience with dogs considers “reasonable” is different from what someone without experience might think. This will result in more conflict between people with dogs and those without.**

Marin Humane Society in its comment on the Final Rule for the DMP, said: “Rarely do non-animal responders completely understand dog behavior in a fashion that generates factual data. More importantly, individual perceptions of animal behavior require fact gathering to enable enforcement responders to adequately understand what the animal behavior impacts really are. Determination of these violations can easily be inaccurate...”

The SF/SPCA in its comment on the Final Rule said: “National Park Service employees are not normally trained as animal control officers and therefore lack the expertise to determine which dog behaviors are undesirable and to effectively enforce the Proposed Rule.”

Plus, the definitions now go into unnecessary detail about negative interactions.

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Comparison by SFDOG