

1 DAVID L. ANDERSON (CABN 149604)  
United States Attorney  
2 SARA WINSLOW (DCBN 457643)  
Chief, Civil Division  
3 J. WESLEY SAMPLES (CABN 321845)  
Assistant United States Attorneys  
4

5 450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
6 Telephone: (415) 436-7031  
7 Fax: (415) 436-6748  
Wes.Samples@usdoj.gov  
8

9 Attorneys for Defendants

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 SAVE OUR RECREATION, et al., ) CASE NO. 4:19-CV-08108-KAW  
14 Plaintiffs, )  
15 v. ) **DECLARATION OF CHARLES**  
16 UNITED STATES DEPARTMENT OF ) **STRICKFADEN**  
17 INTERIOR, et al., )  
18 Defendants )  
19 )  
20 )

21 I, Charles Strickfaden, declare as follows:

- 22 1. I submit this Declaration to supplement the information I provided by Declaration of September  
23 3, 2020.
- 24 2. Statements contained in this declaration are based on my personal knowledge, upon information  
25 provided to me in my official capacity, and upon conclusions and determinations reached and  
26 made by Golden Gate National Recreation Area (GOGA) in connection with the FOIA request in  
27 this case.
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2 3. Exhibit Maps:

3 a. With respect to the exhibit maps in the unsigned 2019 draft Compendium, the Park's  
4 Geographic Information System (GIS) Specialists, Craig Scott and Stephen Skartvedt,  
5 created the maps in GIS (i.e. ArcMap) only once the details were finalized by the  
6 compendium update team. Therefore, there are no drafts per se, rather there are only the  
7 final Exhibit Maps that were included in the unsigned 2019 draft Compendium. The  
8 emails of both Craig Scott and Stephen Skartvedt were searched, and all responsive  
9 records were produced.

10 4. Additional Public Comments:

11 a. Communications from Dog Groups: Because the September 10, 2019 FOIA request was  
12 limited to certain issues relating to the unsigned 2019 draft Compendium, in order to be  
13 captured in the eMail Enterprise Records and Document Management System (eERDMS)  
14 search, comments had to contain words or phrases addressed in the FOIA request. For  
15 example, public comments solely regarding unmanned aircraft (i.e. glider planes, hobby  
16 aircraft, RC planes, or drones), visitation/public use hours, or horse access would not  
17 have been included in the FOIA search results.

18 b. The vast majority of comments received regarding the unsigned 2019 draft Compendium  
19 were sent via email either directly to GOGA\_Public\_Affairs email account (or if sent to  
20 another staffer were forwarded to the GOGA\_Public\_Affairs email account). This email  
21 was searched. All responsive public comments from January 20, 2017 through September  
22 30, 2019 were produced.

23 5. Table of Changes:

24 a. Michael Savidge created the Table of Changes document after the unsigned 2019 draft  
25 Compendium proposed changes were completed, in order to help the public understand  
26 the proposed changes. Accordingly, the Table of Changes for the unsigned 2019 draft  
27 Compendium was created only once. Therefore, there are no drafts per se, rather there is  
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1 only a “Table of Changes” for the unsigned 2019 draft Compendium which reflects the  
2 final updated unsigned 2019 draft Compendium. *See, e.g.* 225-231 (NPS-2019-01625  
3 Carr Final Full Release.pdf). Michael Savidge’s emails were searched, and all responsive  
4 records were produced.

5 6. Dog Walking Access on the Milagra Overlook Trail:

- 6 a. The unsigned 2019 draft Compendium did not contemplate changes to dog walking  
7 opportunities on the Milagra Overlook Trail. The 2017 Compendium contained maps that  
8 were incorrect, and the proposed changes made technical corrections so that the maps  
9 accurately reflected the text. The Milagra trail segment maps now correctly illustrate that  
10 they are also on-leash, dog walking trail opportunities. *See, e.g.* 100, 164, 174, 195, 203,  
11 211, 221, 308, 337 (NPS-2019-01625 Carr Final Redacted.pdf); 51, 59, 67, 68, 73, 77,  
12 83, 92, 101, 110, 119,128, 137, 146, 161, 169, 177, 178, 183, 187, 198, 206, 214, 215,  
13 220, 224, 227 (NPS-2019-01625 Carr Final Full Release.pdf).

14 7. San Mateo County:

- 15 a. The unsigned 2019 draft Compendium did not propose changes to San Mateo County’s  
16 commercial dog walking policy at all. National Park Service (NPS) lands have never  
17 allowed commercial dog walking programs, since commercial dog walking was only  
18 allowed on lands that within NPS jurisdiction as of 1979. San Mateo County lands  
19 including Mori Point, Sweeney Ridge, Rancho Corral de Tierra, and Phleger Estate,  
20 which were added to GOGA after 1979 remain under NPS national policy, which does  
21 not allow commercial dog walking. The 2017 Compendium authorized issuance of  
22 Special Use Permits for commercial dog walking, in NPS land, within Marin and San  
23 Francisco counties, both of which were within NPS jurisdiction as of 1997. To the extent  
24 there may not be extensive responsive records regarding San Mateo County, that is the  
25 reason.
- 26 b. Plaintiffs did not seek information regarding “commercial dog walking in “San Mateo  
27 County.” The eRDMS search included the term ”commercial dog walking” and all  
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1 responsive records were produced. *See, e.g.* 1, 2, 6, 7, 8, 9, 11, 12, 16, 17, 18, 20, 23, 33,  
2 34, 36, 38, 39, 40, 42, 45, 47, 48, 49, 50, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64,  
3 65, 66, 67, 68, 69, 70, 72, 73, 75, 76, 77, 79, 81, 83, 84, 85, 87, 141, 145, 147, 149, 150,  
4 151, 152, 154, 156, 167, 177, 187, 202, 228, 243, 267, 282, 311, 320, 339, 340 (NPS-  
5 2019-01625 Carr Final Redacted.pdf); 43, 58, 85, 86, 95, 104, 113, 122, 131, 140, 149,  
6 153, 168, 190, 205, 229, 244, 246, 248,249, 250, 252, 254, 255, 256, 257, 259, 273, 276  
7 (NPS-2019-01625 Carr Final Full Release.pdf).

8 8. Additional Search Terms:

- 9 a. Crissy Field: The unsigned 2019 draft Compendium did not propose changes to dog  
10 policy at Crissy Field. That is why, even though the search terms included “Crissy Field”,  
11 there may not have been responsive records.
- 12 b. Ocean Beach Snowy Plover areas: The unsigned 2019 draft Compendium did not propose  
13 changes regarding the areas at Ocean Beach upon which Snowy Plovers, an endangered  
14 species, nests. That is why, even though the search terms included “Ocean Beach” and  
15 “Snowy Plover,” there may not have been responsive records.
- 16 c. Categorical Exclusion Justification: The park produces dozens of Categorical Exclusions  
17 each year on a large variety of projects. NPS believes “Categorical Exclusion  
18 Justification” would have produced too many nonresponsive records. However, the draft  
19 Categorical Exclusion for the unsigned 2019 draft Compendium was produced at pages  
20 388-391 of NPS-2019-01625 Carr Final Redacted.pdf.
- 21 d. Table of Changes: Plaintiffs requested records related to “Items 17[- 22] as set forth in  
22 the ‘Compendium Table of Changes for 2019 Update’”. GOGA identified those as Dog  
23 Licensing (Item 17); Voice Control Dog Walking Marin County (Item 18); Voice Control  
24 Dog Walking San Francisco County (Item 19); Leash Possession Required in Voice  
25 Control Areas (Item 20); Permit Requirement (Item 21); Pet Closure (Item 22). The terms  
26 searched included “dogs” “commercial dog walking” “managed dog” “unmanaged dog”  
27 “voice control” “dog licensing” “leash possession” “pets” “sight control” “pet  
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