



Friends of  
Fitzgerald  
Marine Reserve



November 1, 2021

President David Canepa and  
Members of the Board of Supervisors  
400 County Center  
Redwood City, CA 94063

Re: Proposed Off-Leash Dog Pilot Program at Pillar Point Bluff

Dear President Canepa and Supervisors,

At your November 9, 2021 meeting, you will be considering the Proposed Off-Leash Dog Pilot Program as well as adoption of the Initial Study/Mitigated Negative Declaration.

We, the undersigned organizations, urge you to maintain the current requirements for all dogs to be On-Leash at Pillar Point Bluff. We do not object to a limited Off-Leash Dog Pilot Program at Quarry Park. We also strongly support amendments to the County Ordinance Code Chapter 3.68 to authorize park rangers to remove persons from any County Park if their actions threaten wildlife, property, or persons.

Pillar Point Bluff is a coastal gem stretching along the bluffs of the Fitzgerald Marine Reserve where visitors can enjoy sweeping coastal views and appreciate nature along 3.1 miles of trails. Along the blufftop, rare coastal prairie, coastal scrub, and seasonal wetlands provide a rich tapestry of wildlife habitats for coyotes, foxes, bobcats, songbirds and raptors as well as the federally protected California red-legged frog and San Francisco garter snake. At the foot of the bluffs are a narrow sandy beach and rocky tidepools at Ross' Cove, where harbor seals live year-round, and elephant seals, sea lions, and sea otters occasionally visit. All marine mammals are protected under the federal Marine Mammal Protection Act.

Because of the unique habitats at Pillar Point Bluff and adjacency to Ross' Cove and Fitzgerald Marine Reserve, only on-leash dogs should be allowed, with robust monitoring and effective enforcement to ensure that the area's environmentally sensitive habitats and wildlife are fully protected, in accordance with Federal, State, and County regulations.

Off-leash dogs should not be allowed at Pillar Point Bluff for the following reasons:

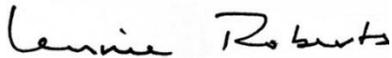
1. Existing compliance with on-leash requirements is shockingly inadequate. A County Parks survey found only 48% compliance with on-leash requirements at Pillar Point Bluffs, according to the Visitor Use Whitepaper in the IS/MND. ***What is needed is effective enforcement of on-leash requirements rather than rewarding widespread non-compliance.***
2. Relying on "voice control" to ensure that off-leash dogs won't harass wildlife, other dogs, and people, is unrealistic. ***Most dogs are not sufficiently trained to respond to their owners at moments of excitement.***
3. Off-leash dogs can easily access Ross' Cove, where the rocky intertidal area is home to harbor seals that reside year-round. On April 7, 2018, an off-leash dog killed a harbor seal pup at Ross' Cove. ***Signage alone is inadequate to prevent off-leash dogs from entering Ross' Cove and harassing, hunting, capturing, and/or killing marine mammals.***
4. Many other protected species, including songbirds, shorebirds, raptors, and the threatened California red-legged frog and endangered San Francisco garter snake, also would be threatened by

off-leash dogs at Pillar Point Bluff as **many dogs will instinctively chase or harass, destroy nests and eggs, and/or cause mortality of these state and federally protected species.**

5. **Many people will also be “recreationally displaced” from Pillar Point Bluff;** including people who are innately afraid of dogs, families with small children and/or folks who fear injury from dog bites or falling if dogs jump on them, as well as owners/handlers of on-leash dogs that become aggressive if approached by off-leash dogs.
6. **Promotion by dog advocacy groups through social media will likely result in a significant increase in off-leash use of this environmentally sensitive area,** with cumulative adverse impacts to plant and animal habitats and adjacent neighborhoods due to inadequate visitor parking at the park’s three entry points.
7. **The proposed Off-Leash Dog Pilot Program at Pillar Point Bluff does not comply with key resource protection policies of the County’s Local Coastal Program, the California Coastal Act, and the federal Marine Mammal Protection Act. The Initial Study/Mitigated Negative Declaration is incorrect, incomplete and inadequate in many respects relative to the Pilot Program at Pillar Point Bluff.**

For all these reasons, we respectfully request that the County maintain the current requirements for all dogs to be on-leash at Pillar Point Bluff. Non-compliance should not be rewarded with a more lenient and clearly unenforceable system. We are also concerned that the IS/MND does not adequately describe the sensitive habitats at Pillar Point Bluff, fails to evaluate the probable environmental impacts to all sensitive habitats and wildlife, and therefore cannot be used as the basis for approval of the Off-Leash Pilot Program at Pillar Point Bluff.

Thank you for consideration of our comments,



Lennie Roberts, Legislative Advocate, Green Foothills



Mike Ferreira, Coastal Issues Committee, Sierra Club Loma Prieta Chapter



Kimberly Williams, Policy Manager, Surfrider, San Mateo County Chapter



Marshall Dinowitz, Conservation Chair, Sequoia Audubon Society



Ron Olson, Chair, Friends of Fitzgerald Marine Reserve

cc: Mike Callagy, San Mateo County Manager  
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Erik Martinez, California Coastal Commission  
Stephanie Rexing, California Coastal Commission