



General Management Plan Amendment

Point Reyes National Seashore

Public Comment Summary Report

March 2018

INTRODUCTION

Point Reyes National Seashore (the park) initiated a 30-day public comment period for the General Management Plan Amendment (GMP Amendment) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area on October 16, 2017. The public was invited and encouraged to share their observations, concerns, and ideas to help the NPS focus the GMP Amendment on significant issues in the planning area. The information obtained during this public comment period will be used to refine the conceptual range of alternatives, identify issues, and ensure that the NPS has the information needed to move forward with initiating the formal National Environmental Policy Act (NEPA) process. The original comment period was extended for 7 days and closed on November 22, 2017.

During this time, two open house meetings were held at different locations near the park. The public was encouraged to submit comments through the NPS's Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/POREGMPA>). Comments were also accepted at the meetings, by US mail, and in person at the park. Nearly 3,000 pieces of correspondence were received during the comment period. This report presents a summary of public comments received during the comment period.

PUBLIC OUTREACH DURING THE COMMENT PERIOD

The NPS issued a press release to more than 35 local, regional, and national media outlets on October 16, 2017, announcing the dates, times, and places of the public meetings. On that date, the NPS sent a letter to more than 200 interested individuals and organizations notifying them of the opportunity to comment, and the NPS PEPC website (<http://parkplanning.nps.gov/POREGMPA>) was activated for the public to submit comments. The newsletter, including information about the background of the project, the conceptual range of preliminary draft alternatives, the background of ranching and tule elk at the park, the planning process, and information on how to comment, was posted to the park web site at https://www.nps.gov/pore/getinvolved/planning_gmp_amendment.htm.

Two open house meetings were held during the comment period at the following locations:

- October 25, 2017: West Marin School Gymnasium, Point Reyes Station, California
- October 26, 2017: Bay Model Visitor Center, Sausalito, California

A total of 170 people attended the two meetings (124 people attended the meeting at Point Reyes Station, and 46 attended the meeting in Sausalito).

English and Spanish versions of the newsletter were provided at both meetings. Meeting banners (display posters) were presented at each venue. The meeting banners included newsletter contents, as well as maps and descriptions of the conceptual range of preliminary draft alternatives. The digital version of these banners (with maps) was made available on the park website following the public meetings. Park staff was available to answer questions and provide additional information to open house attendees. At least one Spanish interpreter was present at each meeting.

Meeting attendees were able to provide comments both verbally and in writing. Flip charts were set up to capture verbal comments at each venue. Writing stations were provided at each meeting where attendees could sit, write down their comments, and submit the form into a box. Attendees also were welcome to

submit any written comments they had brought with them. Comment forms could be taken home and mailed later.

DEFINITION OF TERMS

Primary terms used in the document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. This includes letters; written comment forms; comments entered directly into PEPC; flip charts from the open houses; and any other written comments provided either at the public scoping meetings, by US mail, or in person at the park.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support or opposition for an alternative, additional data regarding the existing condition, or suggestions for resource topics to be considered.

Code: A code is a grouping centered on a common subject. The codes were developed during the comment analysis process and are used to track major issues.

Concern: Concerns are statements that summarize the comments under each code. Some codes required multiple concern statements, while others did not.

COMMENT ANALYSIS METHODOLOGY

Correspondence was received by hard copy letter via US mail or delivered in person at the park, comment forms submitted at the public meetings, oral statements recorded on flip charts during the public meetings, or correspondence entered directly into the internet-based PEPC system. Letters received through the US mail, or submitted in person at the park, as well as the comments received from the public meetings, were entered into the PEPC system for analysis. If attachments, such as articles or photos were submitted, this was noted in the PEPC entry so they could be reviewed, but were not entered as part of the correspondence. Though correspondence is not typically accepted by email, the park accepted a handful of letters by email when the PEPC server was offline immediately prior to the comment deadline.

Once all of the correspondence was entered into PEPC, each was read, and specific comments within each unique correspondence were identified. When identifying comments, every attempt was made to capture the full breadth of comments submitted.

To categorize comments, each comment was given a code to identify the general content of a comment and to group similar comments. Twenty-nine codes were used to categorize the public comments received. An example of a code developed for this project is *AL2500 – Alternative Concepts: GMP Elements*. In some cases, the same comment may be categorized under more than one code, reflecting the fact that the comment may contain more than one issue or idea

CONCERN REPORT

Tables 1 through 31 summarize the comments received during the public comment period and is organized by code.

Table 1. AL1000 – Alternative Concepts: No Ranching and Limited Management of Tule Elk

Concern ID	Corresponding Concern Statement
59969	Commenters suggest that the phase-out period for ranching operations under the No Ranching and Limited Management of Tule Elk alternative concept should be reduced.
59970	Commenters suggest that instead of converting former ranch lands to not-for-profit education, research, and recreation activities, lands should be returned to their natural conditions and used as an elk reserve with limited management to remove nonnative vegetation and prohibit prescriptive grazing in these areas.
60043	Commenters suggest that the 8-foot fence separating the elk reserve from the ranches should be removed under this alternative.

Table 2. AL1200 – Alternative Concepts: Reduced Ranching and Management of the Drakes Beach Tule Elk Herd

Concern ID	Corresponding Concern Statement
59971	Commenters suggest that the Reduced Ranching and Management of the Drakes Beach Tule Elk Herd alternative concept be renamed “Preserving Historic Beef and Dairy Ranching,” and that it should exclude “diversification” and “operational flexibility.”
59972	Commenters suggest that the reduced ranching alternative be modified to reflect the original size of the ranch operations based on the founding agreements between the ranchers and the NPS, as the ranchers’ current footprint has expanded beyond what was originally agreed upon. The alternative should be further modified to mitigate any effects tule elk have on ranching operations with financial compensation to ranch owners to allow them to purchase additional organic, weed-free cattle feed.
59978	Commenters state that the justification for removing ranching acres from Historic D and E Ranches is not detailed enough, and that doing so would have substantial impacts on their business operations.
59979	Commenters request additional information on the Reduced Ranching and Management of the Drakes Beach Tule Elk Herd alternative concept, including details about the ranching activities that would be allowed under this alternative concept, and which ranches would be closed. They also request that NPS identify specific areas for closure.
59980	<p>Commenters suggest other criteria that should be used to establish the reduced ranching alternative:</p> <ul style="list-style-type: none">• The alternative concept should not be based on the economic impacts on private leaseholders and commercial facilities, but rather the NPS should be guided by its management policies and its statutory obligation to prevent impairment of natural resources and wildlife.• The criteria for this alternative would be based on removing operations that are least compliant with permit terms and conditions, or those operations that are most environmentally harmful.

Concern ID	Corresponding Concern Statement
60112	Commenters suggest that the Reduced Ranching and Management of the Drakes Beach Tule Elk Herd alternative concept conflicts with the park’s enabling legislation and contemporaneous records indicating congressional intent. They suggest that this alternative concept be revised to create the settlement-required reduction by removing ranches that are not operated by families who were owners or lessors of land sold to create the park (e.g., Ranch 31). They further suggest that the park should not forcefully and immediately reduce ranching activities but rather allow ranching to reduce “naturally,” either due to death or retirement of any rancher who is not the owner or lessor of the land.
60235	Commenters suggest reducing grazing acreage by 7,500 acres and the number of cattle to eliminate the necessity for thinning the tule elk herd.

Table 3. AL1300 – Alternative Concepts: Continued Ranching and Management of the Drakes Beach Tule Elk Herd (Initial Proposal)

Concern ID	Corresponding Concern Statement
59981	Commenters suggest that the Continued Ranching and Management of the Drakes Beach Tule Elk Herd alternative concept is misleading because it implies a decrease in agricultural acres but does not acknowledge that agricultural use could expand. Commenters suggest that this alternative concept should be more clearly identified as expanded agricultural use.
59982	Commenters indicate support for the Continued Ranching and Management of the Drakes Beach Tule Elk Herd alternative concept, but suggest two revisions: (1) ranch families should be free to transfer their ranch interests to appropriate non-family members, including entities that would facilitate the basic goal of prosperous long-term, well-managed ranch operations, and (2) ranch permits should be extended past 20 years and the transfer of such permits should be allowed subject to reasonable review and approval by NPS.

Table 4. AL1400 – Alternative Concepts: Continued Ranching and Removal of the Drakes Beach Tule Elk Herd

Concern ID	Corresponding Concern Statement
59983	Commenters suggest that this concept include the removal of all elk on ranchlands, including the Limantour-Estero Road herd, not just the removal of the Drakes Beach herd.
59984	Commenters suggest the following additions to the Continued Ranching and Removal of the Drakes Beach Tule Elk Herd alternative concept: <ul style="list-style-type: none"> • Develop a plan to contain elk and manage their population. • Allow for limited additional opportunities in farming and diversified agricultural production to strengthen the overall agricultural economy of the region. • Consider forage improvement practices to existing ranches consistent with water quality improvements and carbon sequestration practices.

Table 5. AL1500 – Alternative Concepts: Continue Current Management (No Action)

Concern ID	Corresponding Concern Statement
59988	Commenters state that the no-action alternative continues management and is not truly “no action.”

Table 6. AL2000 – Alternative Concepts: Ranching

Concern ID	Corresponding Concern Statement
60013	Commenters ask NPS to define how programmatic approaches would be developed, what streamlined implementation means, and what the primary objectives of best management practices would include.
60015	Commenters state that carrying capacity of individual ranches for both dry and wet seasons should be determined by independent scientific experts and based on the current condition of grazing lands and climate change. The goal should include allowing the land to recover, restore, and sustain the resource values of the pastoral zone. Spot checks should be conducted to determine normal fluctuations and possible violations of the lease/permit. Commenters ask how the original carrying capacity numbers were established.
60023	Commenters question how NPS determined the number of acres to remove from ranching or include as resource protection buffers. Another commenter inquires how the park would determine which park resources are included in a buffer area and whether those buffer areas would be adjusted over time based on changing environmental conditions due to climate change. Commenters suggest that NPS should bear the costs of establishing the 750 acres of buffers. Commenters provide a suggestion regarding buffer zones for natural resources and endangered species, stating that zones should be managed properly to ensure they are maintained within a designated area and do not encroach on nearby areas.
60026	Commenters suggest that NPS should hire additional technical support staff dedicated to ranching in the park. This would provide a support system to broaden NPS’s agricultural knowledge, provide technical support to ranchers, enable ranchers to complete conservation projects expeditiously, and increase implementation of stewardship practices.
60028	Commenters ask NPS to provide past agricultural operations and tule elk management monitoring data and results and other park planning documentation to the public.
60035	Commenters ask if there is an environmental basis for describing dairy and beef cattle differently. Another commenter suggests that dairy and beef cattle ranches operate differently and should not be lumped under the same category.
60037	Commenters request that “sustainable ranching” be defined.
60046	Commenters recommend that NPS set resource goals for the pastures and rangeland and require ranchers to meet the resource goals rather than using a strict maximum number of cattle as a management tool. Ranchers could then implement management that would optimize forage production and resource conservation by adapting a year-to-year change. This could provide benefits such as better range and pasture management, increased carbon sequestration, improved viability of ranch businesses, increased teamwork between ranchers and the park, and reduced spoiled and unused forage and weed proliferation.

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60053	Commenters recommend that local residual dry matter (RDM) guides be developed because production varies on the same mapping unit and ecological site because of differences in weather and growing season length. They request that the park work with each rancher to identify RDM monitoring locations that accurately represent the landscape and managed grazing lands, develop RDM monitoring methodologies with documentation that clearly communicates how to conduct measurements, compile and analyze the data, and report the results.
60056	Commenters request that NPS evaluate and discuss the effectiveness of achieving conservation goals using either US Department of Agriculture (USDA) or US Department of the Interior grazing best management practices and provide a rationale for implementation of either set of best management practices at the park.
60058	Commenters express concern regarding effects related to forage availability for livestock on each ranch lease.
60131	<p>Commenters request that NPS collaborate with ranchers to establish programmatic approaches for implementation of best management practices, especially regarding carbon farm planning. The plan should evaluate best management practices, such as rotating grazing patterns, fencing riparian corridors, accommodating the appropriate number of cows, delaying hay cutting to accommodate birds and other species, implementing effective management of weeds, preventing fires, protecting water quality, watering livestock, improving waste/manure and forage practices, and using buffer strips and grassed waterways to support soil and water quality.</p> <p>Commenters request that NPS establish best management guidelines that allow for immediate action on low impact and maintenance projects that need to happen in real time and large projects done through Natural Resources Conservation Service, Marin County Resources Conservation District, or by the rancher developing new agriculture infrastructures such as new barns, feed storage buildings, and buildings related to diversification.</p>
60209	Commenters suggest that NPS develop guidelines for ranchers and NPS to make operational decisions to avoid negative impacts because of delays in decision making.
60213	<p>Commenters request that NPS evaluate and adopt the following programs/standards as part of the GMP Amendment and EIS:</p> <ul style="list-style-type: none"> ● Marin County General Plan (Agricultural Element) ● Grass-fed Beef Ordinance ● Organic Farm Certification Ordinance ● Prohibition of Growing GMOs Ordinance ● Right To Farm Ordinance ● Guidelines identified in Marin County Local Coastal Plan
60238	<p>Commenters suggest NPS develop a planning-area-wide grazing plan that addresses management from an ecological perspective and treats the cattle as one population. All decisions, including culling, pasture rotation, soil building, and consideration of native biodiversity could be made from the perspective of overall ecosystem health. Other elements of such a plan would include:</p> <ul style="list-style-type: none"> ● Calculating the percentage of each ranch that elk inhabit and adjusting lease fees accordingly. ● Maintaining NPS control to manage and rest pastures as part of a planning-area-wide

Concern ID	Corresponding Concern Statement
	<p>grazing plan.</p> <ul style="list-style-type: none"> Recognizing and rewarding operators who willingly participate in experiments, including grazing regimes, breed selection, and using elk as part of holistic grazing practice.
60246	Commenters suggest that alternatives to manure spreading should be investigated and, if feasible, required.
60254	Commenters suggest that ranchers be able to build and supply worker housing.
60258	Commenters request that the NPS consider adapting site specific plans to more adequately support species of concern.
60048	Commenters state that the NPS should include lessees, NRCS, and Marin County Resources Conservation District, in an adaptive management approach that links agriculture and pastoralism to ecological stewardship, restoration, climate change resilience, and mitigation.

Table 7. AL2100 – Alternative Concepts: Tule Elk Management

Concern ID	Corresponding Concern Statement
60066	Commenters recommend that NPS develop a plan to prevent the elk from returning to the pastoral zone and strategies for removal if they do return, including immediate removal from the pastoral zone and fencing to maintain separation. Commenters request that NPS define a broad range of management methods to prevent tule elk from affecting any of the pastoral areas in the park. This includes implementing a tule elk maximum population threshold that triggers efforts in population control.
60069	Commenters suggest using fertility control for management of the tule elk population to reduce tule elk population growth rates and gradually decrease the herd size over time to maintain a stable population.
60070	Commenters suggest that NPS relocate and maintain the roaming tule elk herd in the Limantour Wilderness and ensure that proper forage and water are available. Management strategies could include brush management, enhancement of grassland production, and water supplies. In addition, commenters suggest other areas for relocation, including relocating tule elk from the pastoral zone to other areas of the park such as Tomales Point, the Tennessee Valley area, or the headlands or other state or national parks. Commenters note that efforts to disperse tule elk by park staff require a great level of labor and equipment and are ineffective.
60078	Commenters suggest that tule elk should be managed similar to other natural resources. Commenters suggest that NPS consider retiring the areas most used by tule elk from ranching or reducing the stocking rate of cattle in these areas.
60080	Commenters suggest establishing a 1,200-foot buffer to manage elk and remove them from the pastoral zone.
60081	Commenters suggest that tule elk should be managed to prevent disruption and damage to ranches and recommend the following methods: limited culling, fertility control, fencing, supplement of forage by NPS, designated feeding and watering areas for tule elk, relocation, introduction of predators of tule elk, and sport hunting (including hunting managed by the State of California). Commenters suggest that water, forage, and cover areas should be made available to the tule elk.

Concern ID	Corresponding Concern Statement
60082	Commenters suggest that NPS remove fences throughout the park that limit dispersal of tule elk to forage and water, and that no new fencing should be constructed. Fencing could be constructed to keep tule elk from entering adjacent private lands.
60083	Commenters ask NPS to consider removal of tule elk from the ranch lands in the Limantour-Estero Road area.
60085	Commenters ask NPS to eliminate or minimize the management strategy of lethally removing tule elk.
60089	Commenters raise questions regarding the Tomales Point Elk herd, including a herd decline during the same period the free-roaming Limantour and Drakes Beach herds increased. Commenters ask NPS to provide scientific analysis of the role that water availability had in the decline of tule elk on Tomales Point and request that elk that have escaped from Tomales Point be removed or put back behind the fence and management include culling, necessary to maintain a healthy herd. Commenters state that the tule elk were not historically in the pastoral area and should not be included in the 150-year environmental baseline.
60212	Commenters suggest using native predators, such as mountain lion and coyotes, to manage the tule elk population, noting it would be a more cost effective and humane option.
60262	Commenters suggest that elk meat should be made available to local markets.
60220	Commenters ask NPS to consider the use of fencing as an alternative concept element, including requiring cattle to be enclosed in fenced-off areas, requiring ranchers to supply their own fencing, and using wildlife-friendly fencing to fence off elk while allowing other wildlife through.
60221	Commenters suggest that the costs incurred by a rancher to purchase forage from outside sources to replace forage eaten by elk to keep their organic status should be paid back to the rancher.
60222	Commenters suggest that the current livestock management practices be changed to better enhance biodiversity and provides models of other landscapes where this approach has been successful. Commenters note that if these practices result in adverse economic effects, the rancher should be compensated. Another commenter suggests that the park provide cost-sharing funding for ranchers' environmental projects in the pastoral zone.
60257	Commenters request that the GMP Amendment and EIS consider use of Miwok management practices to manage tule elk, such as, extensive burning, vegetation management, and hunting.
60052	Commenters question if new NEPA analysis is necessary because the impacts of relocating the tule elk back to their designated range have already been studied in the 1998 Tule Elk Management Plan, and the actions in the 1998 plan should be implemented without further NEPA review.
60027	Commenters request more information on what the term "managed" means with respect to the elk, and if management of the elk involves lethal removal of elk from the herd.

Table 8. AL2200 – Alternative Concepts: Diversification

Concern ID	Corresponding Concern Statement
60101	Commenters suggest several options for diversification on ranches, stating that diversification should be sustainable. Commenters note that allowing agricultural operations to expand is key to maintaining operational flexibility.
60102	Commenters suggest that any diversification be limited; some commenters ask that diversification be limited to the ranch core or other specific locations. Commenters suggest that only crops related to beef cattle or dairy ranching should be allowed. An overall acreage for cultivation should be determined and distributed to ranchers who want to cultivate crops on the ranch lands. One commenter suggests that diversification should not be allowed unless Johne’s disease is eradicated.
60014	Commenters suggest that new types of agriculture, such as poultry raising or vegetable crops for commercial sale and on-site sales of produce should not be allowed inside the park.
60113	Commenters request that NPS define and clarify the term diversification as used in this planning effort. Commenters also ask NPS to identify specific plans for diversification.
60116	Commenters suggest that the park should require special-use permits for activities on the ranches related to visitor use.

Table 9. AL2300 – Alternative Concepts: Silage

Concern ID	Corresponding Concern Statement
60121	Commenters ask NPS to consider and analyze the benefits of critical seasonal forage production on park ranches, including effectively managing weeds, reducing imported supplemental feed, incentivizing on-site resource use and ranch resiliency, and providing habitat for birds. One commenter requests NPS consider allowing production and storage of silage and hay on their ranch, while another commenter recommends allowing up to 25% of a rancher’s leased acreage for silage production.
60122	Commenters suggested a number of mitigations for silage production to protect bird and wildlife habitat including limiting silage to areas already under silage production, requiring bird surveys prior to mowing, implementation of no till practices, and a long-term monitoring program.

Table 10. AL2400 – Alternative Concepts: New Alternatives or Elements

Concern ID	Corresponding Concern Statement
60239	Commenters suggest that NPS evaluate a reduced ranching scenario that includes closure of ranches bordering Drakes Estero.
60123	Commenters suggest that NPS create an alternative that prioritizes cultural resource conservation and ranching. This alternative would include a longer lease (up to 60 years), require the relocation of elk off of the ranching areas, evaluate ranches recently removed from grazing (within the last 20 years), and consider restoring grazing for its ecological benefits.
60214	Commenters provide site-specific suggestions regarding infrastructure, including building new structures, such as a loafing barn, and removal of other buildings and signs.

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60219	Commenters suggest development of a volunteer program for citizens to provide assistance in maintaining park structures.
60223	Commenters suggest a new alternative be considered that would remove ranching and involve active restoration of Point Reyes' natural resources.
60247	Commenters state that the NPS should also encourage re-use of ranches that have gone out of operation, including Horick (D) Ranch, Rancho Baulines (Wilkins Ranch), Jewel Ranch, and the ranches around the village of Bolinas such as the former RCA ranch (above Mesa Road), and Texiera.
60249	Commenters request that all axis and fallow deer be removed completely by non-lethal means.
60252	Commenters suggest that an additional alternative be considered that would provide for operational flexibility, diversification opportunities, and a modest expansion of herds over the life of the permits once ranchers forage adopt and implement forage improvement practices.
60253	Commenters recommend developing an alternative that ensures that elk and other wildlife have a corridor through which to move between larger habitat areas of Point Reyes.
60259	Commenters state that the range of alternatives does not include an option to continue ranching in a manner that would protect park resources and improve rangeland.
60260	Commenters suggest that the 1980 GMP proposed action be considered as an alternative.

Table 11. AL2500 – Alternative Concepts: GMP Elements

Concern ID	Corresponding Concern Statement
60031	Commenters state that the planning process should not look at the carrying capacity of visitors and allow full recreational uses of grazing pastures with or without cattle or tule elk present. Visitor use and livestock are intermingled frequently elsewhere in the west without undue impacts on any components of the natural resources.
60187	Commenters indicate that the information provided to the public is missing elements, including a resource strategy and text stating the purpose and benefits associated with extension of ranch leases. Other requests from commenters include (1) that legal requirements be refined in the GMP Amendment and EIS; (2) that the GMP Amendment and EIS include laws and regulations related to ranch management; and (3) that the GMP Amendment and EIS comply with former GMP regulations that require the restoration of historic natural conditions.
60188	<p>Commenters list a variety of natural resource priorities for the NPS to consider and also inquire about the criteria and process the NPS would use to ensure natural resources, habitat, and cultural resources in the park remain protected. Commenters ask what opportunities are available to enhance future stewardship of these resources in the planning area.</p> <p>Commenters suggest the following items be prioritized in the GMP Amendment and EIS:</p> <ul style="list-style-type: none"> ● Restoring elk herds to historical numbers ● Protecting natural values of the park ● Protecting flora and fauna in the park

Concern ID	Corresponding Concern Statement
	<ul style="list-style-type: none"> • Park values
60190	Commenters made many recommendations for improving and expanding the trail network in the park. Ideas include creating new multi-use trails, facilitating access to existing trails on ranchlands, designing trails to reach significant points of interest, and creating trail connections to enable visitors to cross the entire park.
60191	Commenters request that the NPS elaborate on what the nature of “not-for-profit education, research, outdoor experiential activities” would be, and if they could potentially take place on ranches that are closed.
60192	Commenters suggest examining options for visitor shuttles to relieve congestion and parking constraints.
60193	Commenters suggest the scope of the GMP Amendment and EIS should include creation of new interpretive sites, and provide specific examples. Commenters also request that the park expand its interpretive programming to educate visitors about the historical connection between people and the park’s landscape, including the Coast Miwok and the history of agriculture and ranching in the park.
60196	Commenters state that the NPS must follow the NPS Management Policies 2006 by ensuring habitat restoration is a top priority and that multi-generational, environmentally sustainable ranching protects, restores, and preserves park resources. Commenters ask about the criteria the NPS uses to (1) ensure the preservation of natural resources and processes and prevent degradation to habitats and (2) review habitats within lease/permit areas. Commenters also ask about the opportunities that would be available to lease/permit holders to engage in restoration activities.
60237	Commenters suggest creating and developing numerous types of overnight accommodations, including campgrounds (e.g., car, kayak-in, tent cabin, and backpacking), re-use of unoccupied ranch buildings, and allowing ranchers to offer short-term overnight accommodations in existing facilities.
60244	Commenters suggest several types of additional visitor experience activities or facility improvements that should be available within the planning area, including increased parking in the south end of the park by Bolinas or an alternative means of public access to the popular hiking trails in this area, additional kayak launch areas, and a snack bar.
60261	Commenters request that historic buildings be left as they are, and not be restored to museums, cafes, or shops for the public to view.

Table 12. IS1100 – Issues and Impact Topics: Cultural Resources

Concern ID	Corresponding Concern Statement
59973	<p>Commenters state that ranching and agriculture in the park are integral to its unique history, and that historical agriculture brings cultural, environmental, and economic benefits to the park, further supporting the park’s mission and contributing to the cultural and ecological significance of the region. Commenters state that reduction or elimination of ranching or dairying in the park would violate or compromise the park’s mission, the historic districts’ eligibility for nomination to the National Register of Historic Places, and the Point Reyes National Seashore Enabling Act.</p> <p>Commenters also request that NPS recognize the long-standing history of agriculture in the park and prioritize preserving ranches and dairies to preserve this cultural history. Commenters request that the NPS evaluate the restoration of historical ranch practices.</p>

Concern ID	Corresponding Concern Statement
	Another commenter requests that the NPS assess how to continue ranching in the park while ensuring that ranch operations represent environmental and agricultural best practices.
59976	Commenters request that opportunities to protect and enhance pre-ranching cultural resources be explored, and that NPS assess how ranching may affect these resources. Commenters also request that the NPS evaluate how historic buildings may be used to promote pre-ranching cultural resources to the public. Another commenter requests that the NPS assess whether ranching in the park and associated ranching facilities are historic resources or have any historic attributes unique to the Marin and Sonoma Counties. Similarly, commenters ask about how expanding agricultural practices would support the historical focus of the park's mission.
59977	Commenters provide input about the eligibility of ranches for listing in the National Register of Historic Places and whether they should be nominated to the National Register. Commenters also request that the park follow the cultural landscape policies and guiding principles outlined by the United Nations Educational, Scientific, and Cultural Organization (UNESCO) and recognize pastoral areas as continuing landscapes.
60245	Commenters state that the park's ranches should be considered as Traditional Cultural Properties.

Table 13. IS1200 – Issues and Impact Topics: Socioeconomics

Concern ID	Corresponding Concern Statement
59986	Commenters express concern over the economic impacts that elk herds may have on ranching operations and request that this topic be examined.
59994	Commenters request the NPS include a thorough economic and environmental analysis regarding the management of tule elk to understand, under any alternative, how the herd should be managed to avoid conflicts with ranches. The analysis should include the costs to NPS for management and removal of tule elk; an assessment of claims by ranchers that elk consume livestock forage, damage equipment and infrastructure, and physically harm cattle; and baseline information in the affected environment.
60064	Commenters express concern over the adverse impacts that the reduced ranching or no ranching alternative concepts may have on the local economy and community, including the impacts on local schools. Commenters ask about the impacts on local events that celebrate historical and current ranching, which bolster local tourism. Commenters also emphasize that ranches are significant contributors to the local economy and request that the NPS detail the local economic benefits that ranching provides to the community.
60067	Commenters express concern over the economic impacts that ranch and dairy closures may have on specific agricultural products in the local foodshed and food system, including the potential increase in prices and food miles for meat and dairy products. Commenters request that the NPS analyze the benefits of local agricultural production, including the resource management benefits that ranching and dairy farming provide, the contributions the industry provides to the local and regional economy, and how cultural and natural resource preservation and management objectives are successfully met.
60087	Commenters ask how NPS determines the fair market value of grazing and housing leases and whether this process is consistent with federal policy and processes on other federal lands. Commenters request that NPS compare grazing and housing rental rates inside the

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	park to those outside the park and quantify the annual loss to the park should below-market leases for grazing and rent be selected.
60088	Commenters state that ranching is necessary to keep the economy diverse and notes that an over-emphasis on tourism could adversely affect water, sewage, and garbage disposal in the park. Another commenter requests that the economic benefits to the local economy from park visitors and wildlife viewing be assessed, and that income from recreation be compared to income from park grazing leases, using the 2006 NPS Economic Impact Study. Commenters also request that baseline information on the economic aspects of visitor use and ranching be incorporated into the GMP Amendment and EIS.
60090	Commenters state that under the Continue Current Management alternative concept, the assumption that current park management resources would remain at current levels seems unrealistic given that the tule elk populations would grow and require increased management. Commenters ask to what extent costs related to elk damage would be shifted to the ranches and dairies.

Table 14. IS1300 – Issues and Impact Topics: Species of Special Concern

Concern ID	Corresponding Concern Statement
60092	Commenters express concern that livestock grazing suppresses the growth, vitality, and distribution of native flowering plants and impairs the viability of the Myrtle’s silverspot butterfly population at the park.
60093	Commenters request that the GMP Amendment and EIS identify and include detailed analysis of impacts on salmonids that occur from livestock grazing.
60095	Commenters state that grazing of competitive, nonnative plants has a positive influence on Sonoma spineflower survival and that exclusion of grazing could have adverse impacts.
60097	Commenters state that the habitat needs of native and migratory species should be identified, that all alternative concepts comply with the Migratory Bird Treaty Act, and that mowing of silage or other crop harvesting be prohibited until the end of the bird-nesting season.
60098	Commenters suggest that the GMP Amendment and EIS should examine the declining tricolored blackbird’s dependency on cattle. Commenters also ask about whether dairy operations provide important winter habitat for the species.
60099	Commenters state that western snowy plovers are adversely impacted by livestock grazing and the GMP Amendment and EIS should discuss and analyze the potential impacts on bird species that could result from continued and increased ranching activities.
60100	Commenters state that grazing exclusions in the park have resulted in the extirpation of some populations of endangered tiger salamander and the California red-legged frog from “protected sites,” and that ponds developed for livestock water provide half of the available habitat for these species. However, other commenters suggest that some impacts associated with cattle grazing may result in adverse effects to all life stages of California red-legged frogs.

Concern ID	Corresponding Concern Statement
60105	Commenters request that the NPS discuss and identify the following topics regarding ranching activities and species of special concern: (1) measures to provide maximum protection for sensitive species or their critical habitat and the protection and recovery of federally listed species; (2) impacts on designated critical habitat for any federally listed species; (3) limitations or mitigation measures needed for protection of listed species; (4) habitats for listed wildlife and plant species; (5) protective buffers needed to maintain ecological function for species suitable habitat; (6) designated critical habitat for federally listed species in the planning area; (7) areas where ranching overlaps or runoff drains into critical habitat or habitat for state-listed species; and (8) where removal and control of invasive species is needed to protect sensitive species.
60107	Commenters state that no monitoring of the elk's impact on threatened and endangered species has occurred as elk have expanded into ranchlands.
60108	Commenters state that cattle are trampling rare native plants in the Bull Point Trail area and request that the NPS work with the Marin Chapter of the California Native Plant Society to resolve the issue.
60109	Commenters state that Marin dwarf flax may benefit from a moderate level of cattle grazing if taller competing vegetation is reduced and may be suppressed by buildup of thatch from previous year's herbage if left ungrazed.
60111	Commenters state that thousands of rare and important snakes would be killed by entrapment under bulldozed soils, and deer, birds, and other herbivores would lose a lot of grazing area if NPS were to allow farming to occur on undisturbed soil.
60139	Commenters state that the NPS should analyze the impacts of grazing on listed plant species in the park and discuss any change in the status of populations of these listed plants since the 2002 Biological Opinion.

Table 15. IS1400 – Issues and Impact Topics: Visitor Use and Experience

Concern ID	Corresponding Concern Statement
60125	Commenters state that the presence of elk are an asset to visitor use and experience and that removal of elk from the park would negatively affect visitor attendance.
60126	Commenters state that discontinuing ranching in the park would adversely affect visitor use. Another commenter states that if ranching were discontinued, the land would be underutilized because ranch lease areas are not suitable for visitor use.
60127	Commenters state that continued ranching in the park would adversely affect visitor use due to the presence of fencing, gates, excrement, odors from manure and urine, and trampled ground.
60128	Commenters ask questions about specific locations in the park where visitor experience may be affected by the preliminary action alternatives, including how elk population increases could affect visitor use near the Drakes and Limantour Beaches.
60129	Commenters ask the park to carefully study any new proposals to expand ranch use that might cause automobile traffic to increase.
60130	Commenters state that the NPS must analyze the cumulative impacts of electric fencing on public access and movement of wildlife.

Table 16. IS1500 – Issues and Impact Topics: Vegetation

Concern ID	Corresponding Concern Statement
60132	Commenters state that ranchers are valuable stewards of grasslands and that maintaining grazing as a permitted use provides ecosystem services such as habitat for endangered species and pollinators, carbon sequestration, water storage, and invasive plant control, and they contribute to the "scenic environment."
60133	Commenters are concerned that removing ranches would result in an increase in invasive plants. Commenters also state that removing cattle would require the introduction of other stewardship practices such as controlled burns.
60134	Commenters state that spraying manure slurry on pastures has contributed to the conversion of native grassland to nonnative weedy annuals. Commenters request that NPS fully analyze the role of domestic livestock in introducing, spreading, and perpetuating infestations of invasive weeds and require leaseholders to use certified "weed-free" products if these products are brought into the park.
60135	Commenters state that an integrated pest management plan should be documented and approved by the park for permit holders and note that pesticides and herbicides should not be applied under any circumstances. Commenters inquire about current herbicide use to control weed management, whether the current usage of herbicides used is a baseline, how the park intends to analyze weed management techniques, and what priority the park will give the restoration of native grasses.
60136	Commenters state that proactive management techniques such as buffers, restoration efforts, and adjustments to the number of grazing animals would promote the protection and restoration of native vegetation and rare plants.
60137	Commenters state that the NPS should evaluate and discuss how much feed is imported as a percentage of total feed for cattle in the park and how prescriptive grazing of nonnative plant communities conflicts with preservation and restoration of native and rare plant communities.
60138	Commenters request NPS provide the scientific background that determines what levels and practices of cattle grazing are compatible with, or conflict with, maintaining native and rare plant communities.
60142	Commenters state that the NPS should address, clarify, and elaborate on issues associated with native (including rare plants) and nonnative plants communities in grazed and ungrazed areas of the park.
60146	Commenters state that there is no scientific evidence that livestock grazing can accomplish prescriptive grazing better than grazing by tule elk, and request that the park provide evidence that indicates cattle grazing would be superior to grazing by native ungulates.
60147	Commenters inquire how NPS would address overgrazing. Specifically, commenters ask (1) what baseline is used to inform management actions, (2) how the park would ensure that adaptive management techniques would endure with limited personnel resources, (3) what residual dry matter techniques would be applied to prevent overgrazing, and (4) what actions the park would take if overgrazing occurs.
60150	Commenters state that excessive feces and urine deposition within or adjacent to areas inhabited by the Sonoma alopecurus, the spineflower, beach layia, Tidestrom's lupine, Tiburon paintbrush, and Marin dwarf flax may alter habitat conditions by fertilizing nutrient poor soils. The commenter also states that grazing activities may result in trampling of individual plants, soil compaction, consumption, erosion, and impacts that may influence presence of invasive species, especially in dunefield communities. The commenter

Concern ID	Corresponding Concern Statement
	requested that the NPS fully analyze impacts of livestock operations on native plant species.
60155	Commenters ask NPS to provide an analysis under the No Dairy Ranching and Management of Drakes Beach Tule Elk Herd alternative concept regarding the reduction or increase in animal unit months, residual dry matter, and forage that would occur if current dairy operations are switched to beef cattle grazing. Commenters also ask NPS to provide analyses that address the purpose of switching dairy operations to cattle grazing; removing dairy ranching rather than beef ranching; and the environmental and public benefits from retiring dairy operations and converting that land to wildlife habitat.
60186	Commenters state that the NPS must fully incorporate a moratorium on domestic livestock grazing in and near dune communities and analyze all alternatives with regard to the potential impacts of livestock on these fragile ecosystems.

Table 17. IS1600 – Issues and Impact Topics: Public Health and Safety

Concern ID	Corresponding Concern Statement
60160	Commenters state that the grazing activities, from both cattle and elk, reduce the amount of fuels in the park, thereby preventing wildfire. Commenters also note that the NPS should consider the cost to mitigate fire danger and discuss the concept of using grazing to control fuels.

Table 18. IS1700 – Issues and Impact Topics: Soils and Geology

Concern ID	Corresponding Concern Statement
60166	Commenters state that grasslands in the park are overgrazed, causing erosion, sedimentation, runoff, soil compaction, and a reduction in biodiversity. In addition, commenters note that the conversion of many areas to annual grasses may have reduced the capacity of the vegetation to hold soils during precipitation events.

Table 19. IS1800 – Issues and Impact Topics: Wildlife and Wildlife Habitat

Concern ID	Corresponding Concern Statement
60173	Commenters note that cattle ranching operations, row crops, and commercial livestock farming actions degrade wildlife habitat, and lead ranchers to kill predators such as bobcats, coyotes, and mountain lions.
60176	Commenters request that NPS discuss or identify the following issues associated with ranching activities in the GMP Amendment and EIS: (1) the science on livestock grazing impacts on native vegetation and riparian areas in the park; (2) the amount of water needed for beef and dairy cattle production in the park and how that use affects water available for native wildlife and plants; (3) whether pasture dogs are allowed in the lease areas and their impacts on wildlife; and (4) any rancher depredation of wildlife or requests for wildlife control.
60179	Commenters provide a list of practices that they believe must be prohibited or addressed in the GMP Amendment and EIS.

Concern ID	Corresponding Concern Statement
60184	Commenters suggest that NPS should not allow predator control of native carnivores.
60185	Commenters state that the return of the wolf to California would be beneficial to reestablish natural predator-prey assemblages that include the tule elk.
60199	Commenters state that NPS should discuss the following issues associated with ranching: the elevated populations of invasive starlings and native cowbirds and the elevated populations of ravens and impacts on native wildlife, particularly snowy plovers.
60201	Commenters ask that NPS consider various aspects of elk management in the impact analysis, including the consequences of continuing to keep the Tomales Point herd or the Drakes Beach herd fenced out; dietary deficiencies as a result of confinement at Tomales Point; the carrying capacity of the ranchlands for tule elk and whether the current tule elk population is near that capacity; the potential for rebuilding a large elk herd on the park and the benefits this would provide for genetic diversity on long-term persistence of the species; and how the tule elk herd would be managed during a transitional period if ranching is phased out and what management principles would be used if there is no ranching on the park.
60203	Commenters state that tule elk play a critical role in preventing succession of open grasslands to less diverse, shrub-dominated ecosystems and have a positive impact on native grassland species abundance and diversity.
60204	Commenters request that NPS include calculations of a minimum effective population size (N_e) for the tule elk for each alternative concept and provide analysis of how this compares to the ecological and genetic minimum viable population (MVP) for the herd.
60168	Commenters describe various concerns related to tule elk on the pastoral zone, including economic loss, lost forage, disease, use of ranch water sources, need to supplement feed for cattle, disruption of ranching activities (i.e., milking, herding), injury or mortality of cattle by tule elk, risk of non-compliance by ranchers of residual dry matter standards, the need to reduce cattle stocking rates, inability to maintain organic certification, and damage to ranch fencing. Commenters suggest that unmanaged tule elk inevitably would replace ranches and the scenic values of the pastoral zone would suffer unacceptable impacts leading to impairment.
60205	Commenters suggest that NPS should also consider the impact of silage operations on native ecosystems. The impacts from removal of native plants should be disclosed and rationale for allowing these impacts should be included. NPS should disclose and fully evaluate the use of herbicides, insecticides, rodenticides, and fertilizers on silage in the park and the effects of these agents on native plants, animals, and ecosystems and whether the use complies with NPS legal and regulatory standards applicable to the park.
60208	Commenters state that many fences in the pastoral zone can harm wildlife and are not wildlife friendly. These wires are battered, broken, or missing the upper and lower wire that allow wildlife to pass without harm. Commenters also note that they see barbed wire or other harmful wire left in fields for long periods, which are hazardous to wildlife and detrimental to the visitor experience.

Table 20. IS1900 – Issues and Impact Topics: Water Resources

Concern ID	Corresponding Concern Statement
60174	Commenters state that impacts on water resources should be analyzed and also request clarification on the actions that would be necessary to protect aquatic resources and remediate the impairment of water quality by livestock grazing.
60177	Commenters ask that the NPS address specific water quality issues such as those caused by increased traffic in the park and provide more information on measures NPS and ranchers would use to safeguard water quality, including using US Environmental Protection Agency Section 319 grants, partnering with the Marin Resource Conservation District, and cost-share contributions from ranchers and farmers. They also request additional information on where the ranchers' water comes from, including groundwater, and how much water is required for these operations.
60178	Commenters ask how NPS would address the California Water Board's request to address rangeland assessment and facility inspections, compliance monitoring, record-keeping, implementation of management practices, reporting, and, if necessary, enforcement. The GMP Amendment and EIS should also discuss NPS enforcement of state and federal regulations. The commenter also asks how the GMP Amendment and EIS would address the issues raised by the California Water Board, including water supply development, impacts on riparian zones, performance standards for fencing, maintenance of dairy and ranch land infrastructure, farmstead stormwater best management practices, and the water quality monitoring program.
60180	Commenters ask NPS to identify any pesticides, rodenticides, herbicides, fertilizers, or other toxic chemicals used at ranches and dairies, and the extent to which they are used in these operations and request that NPS test streams and ponds for nutrients and pathogens annually and report the results.
60182	Commenters express concern about the water quality in the stock ponds and how it affects wildlife habitat from erosion, runoff, siltation and nitrogen overload. Commenters also request that NPS analyze and disclose ecological impacts from dams and stock ponds on ranchlands.
60183	Commenters state that fencing riparian areas should be required if surface water is degraded from livestock grazing to protect water quality and riparian resources. Another commenter notes that development of springs and ponds within the park help distribution of forage consumption by cattle evenly across a pasture, and that fencing riparian areas may not always be the best solution.

Table 21. IS2000 – Issues and Impact Topics: Wilderness

Concern ID	Corresponding Concern Statement
60169	Commenters express concern that NPS may consider using helicopters to manage elk and state that using helicopters in wilderness is illegal under the Wilderness Act.
60170	Commenters state that the Phillip Burton Wilderness Area should not be changed or manipulated, and no structures should be authorized in this area. They further note that a lack of baseline information makes it impossible to characterize impacts on wilderness.
60171	Commenters state that because of historical human activity and manipulation of the landscape at Point Reyes, the notion of wilderness as applied to the park is inappropriate.

Concern ID	Corresponding Concern Statement
60172	Commenters inquire about the strategies the NPS would propose to ensure that cattle do not encroach on and impair park resources in wilderness areas and whether penalties would be assessed to ranchers if their cattle habitually roam and graze outside the ranch lease areas.

Table 22. IS5000 – Issues and Impact Topics: Other

Concern ID	Corresponding Concern Statement
60148	Commenters express concern regarding future impacts to park resources from climate change. Commenters ask NPS to assess future impacts from climate change, including how future predicted sea level rise would affect park resources (natural and cultural). Commenters specifically request that NPS begin assessing impacts on wildlife that may migrate into the current pastoral zone, and that the park begin mitigation planning to accommodate wildlife. Commenters also ask how the park would manage changes to nearby bordering coastal areas and request that areas throughout the park be managed to minimize climate change and drought impacts. Several commenters state that climate change impacts were omitted from the purview of the project’s scope of work and note that continuing cattle ranching is incompatible with NPS’s goal of a reduced carbon footprint. Some commenters suggest that proper grazing is a carbon sequestration technique. Commenters request that NPS incorporate the methane emissions and climate change management tenants of the Marin Climate Action plan into the GMP Amendment and EIS. Commenters also request that the park use and demonstrate use of the best available science in all climate change-related assessments.
60149	Commenters state that tule elk have tested positive for Johne’s disease and that this could harm dairy and cattle operations. Commenters ask that this topic be discussed in detail in the GMP Amendment and EIS. Commenters also request that the NPS include details on the presence of Johne’s disease prior to reintroducing tule elk in the park; historical presence of disease on the park and if ranching operations can act of vectors for diseases; NPS disease monitoring plans; and disease remediation for eliminating disease from park livestock.
60151	Commenters request that NPS assess aesthetic and noise-related impacts from general park activities and from ranching and dairying operations. Commenters ask about the long-term visual impacts if ranching were terminated, how these impacts would be addressed, and whether park resources would be required to manage such impacts. Another commenter requests that NPS factor in the externalities of ranching and dairying operations (e.g., trash, fencing, damaged roads, and cattle manure) in an aesthetic impact analysis.
60153	Commenters express concern over the impacts that ranching or elk management activity may have on park resources such as personnel, budget, and infrastructure, and ask whether additional resources may be required. Commenters request that the budget allocations for staff, infrastructure, and maintenance related to ranching and visitor services, as well as income, grazing fees, and ranching rental amounts, be disclosed in the GMP Amendment and EIS. Another commenter expresses concern over the park’s ability to monitor grazing impacts because of budget cuts. The commenter also suggests that NPS incorporate stewardship practices into lease terms as a cost effective way to reduce adverse impacts from cattle grazing and reduce the risk for forest fires and the spread of invasive species in the park.
60154	Commenters suggest that the No Dairy Ranching and Management of Drakes Beach Tule Elk Herd alternative concept would devastate the native ecology in the park and notes that

Concern ID	Corresponding Concern Statement
	ranching has served a vital function in maintaining the balance between humans and nature in that area.
60156	Commenters request that NPS address impacts on roadways from ranching and dairying activity and assess whether additional roadway repairs may be necessary. Another commenter requests that NPS explore the extent to which ranchers could be held financially responsible for impacts on roadways and cattle guards from ranching activity.
60157	Commenters state that ranching families in the park must comply with a large number of regulatory requirements and notes that equity between ranching zones should be considered to ensure that ranching in the park remains viable and competitive.
60158	Commenters request that detailed information and impacts related to exclusion fencing used to prevent livestock from entering waterways and wetlands be disclosed and ask NPS to identify areas in need of exclusion fencing. The commenter also requests that impacts from existing fencing as they relate to maintenance and wildlife be discussed and unneeded fencing be removed in accordance with a published removal timeline. Another commenter also requests that NPS disclose all commercial and residential structures in the grazing lease areas and clarify how such structures are financed and regulated. The commenter requests that the environmental impacts and costs related to maintenance and upkeep of infrastructure and utilities used in ranching be disclosed. Additionally, the commenter inquires about the levels of greenhouse gas emissions that are generated from ranching activity, whether off-road vehicles are permitted on ranch lease areas, and if ranchers store gasoline on-site.
60159	Commenters ask about the environmental or natural resource best management practices and mitigation measures that are in place for ranchers and ranching activity. Commenters ask NPS to specify which ranching and dairying activities require mitigation and to detail the existing mitigation measures that are in place to protect park resources. Another commenter requests that impacts from each alternative concept and associated mitigation measures be included in the GMP Amendment and EIS and that lease compliance be incorporated into mitigation measures for ranch leases.
60161	Commenters request that NPS disclose all ecological, legal, and regulatory violations associated with remaining ranch operations.
60163	Commenters request that human activity be considered an impact on the environment and that this impact be managed.
60164	Commenters request that the NPS evaluate the environmental and ecological benefits of the completed plan and suggest that such benefits include reduced energy use, improved habitat, and reduced livestock impacts on sensitive resource areas.
60167	<p>Commenters suggest the Continued Ranching and Removal of the Drakes Beach Tule Elk Herd alternative concept should discuss the following:</p> <ul style="list-style-type: none"> ● The ineffectiveness of removing tule elk from the Drakes Beach and ranch lease areas through translocation ● Research showing that translocated elk returned to the Drakes Beach herd ● Research that elk can swim across Drakes Estero ● The origin of the Drakes Beach herd from the Limantour herd and the likelihood that elk would or would not stay out of ranch lease areas ● The annual amount of taxpayer dollars used for moving and hazing elk from the ranch lease areas

Table 23. LP1000 – Laws/Policies Issues

Concern ID	Corresponding Concern Statement
60112a	Commenters suggest the park’s enabling legislation authorizes continued agricultural operations in these areas and alternatives mandated by the court order -specifically no ranching and reduced ranching should not be analyzed.
60114	Commenters suggest that the alternatives required by the Settlement Agreement are inconsistent with the Coastal Zone Management Act of 1972, they are not consistent to the maximum extent practicable with the enforceable policies of approved State management programs, and they fail to uphold federal consistency with state-approved coastal management plans in accordance with the Coastal Zone Management Act of 1972.
60115	Commenters suggest that the No Dairy Ranching and Management of Drakes Beach Tule Elk Herd alternative concept prioritizes ranching over the protection of natural resources, even though the Organic Act places emphasis on the protection, restoration, and preservation of natural resources over beef cattle ranching operations.
60117	Commenters ask NPS to provide legal justification for allowing agricultural activities other than ranching.
60118	Commenters suggest that removing tule elk is inconsistent with applicable laws and policies and ask how it would leave the park unimpaired for future generations.
60119	Commenters request information regarding how this planning effort will comply with the Coastal Zone Management Act.
60120	Commenters state that NPS should require all the NPS organic dairy/livestock/poultry operations to meet the highest livestock and poultry standards adopted under the National Organic Program.
60005	Commenters suggest that ranching should be prohibited because it is not consistent with the park’s enabling legislation. They note that the purpose of the park is to preserve natural areas for public access and enjoyment, and that by allowing ranching, the public is not granted full access to NPS land. Commenters also request that NPS analyze how ranching leases conflict with public recreation, public benefit, and general protection of natural resources in the park and discuss how ranching areas will not impair park values, natural resources, historical preservation, interpretation, and scientific research opportunities within the park. Commenters request that the park’s legislative history be provided with an analysis of how it supports continuing or ending ranching.
60006	Commenters suggest that NPS is directed, per the NPS Management Policies 2006, to mandate best management practices for all ranching activities, and request that NPS define these statutory and administrative mandates and the standards that apply to ranch management in the GMP Amendment and EIS.
60007	Commenters note that enclosing or culling tule elk and allowing row crops and additional domesticated animals in the park would be contrary to the purpose of national parks and may result in the removal of native predatory species.

Table 24. LE1000 – Lease/Permit Issues

Concern ID	Corresponding Concern Statement
60061	Commenters state that ranchers should pay full market rates for lease/permit of park lands. Charging below fair market value is unlawful and it is NPS’s obligation to collect fair market value for all federal assets.

Concern ID	Corresponding Concern Statement
60063	<p>Commenters offer numerous suggestions regarding what lease/permits conditions should include. These suggestions include stipulations that ranchers use the land to protect and keep environmental values; best management practices and other natural resource protections specific to activities that ranchers would be required to adhere to protect resources and visitor experience in the park; maintenance requirements for road and other park facilities in around ranches; and guidelines on the acceptable number of livestock. These conditions should identify site-specific practices. Lease/permits should clearly state responsibilities, timing, or locations for practices and provide detailed budgets. Commenters suggest that NPS should provide financial support to ranchers to implement conservation measures and best management practices. New permits should be made available to the public. Lease/permits conditions should require ranchers to provide educational experiences and activities related to current and historical agricultural activities and culture of the area.</p>
60068	<p>Commenters state that NPS should develop incentives (e.g., grants, reduced rent, allow infrastructure development) for ranchers who actively enhance natural systems on leased park land. Once commenter suggests that leases could be structured as Stewardship Contracts, similar to those used by other agencies.</p>
60071	<p>Commenters request information on lease enforcement problems, past enforcement actions, and how NPS ensures compliance with lease conditions. Commenters suggest that enforcement activities should be performed on a case-by-case basis and not applied wholesale to ranch operations.</p>
60072	<p>Commenters ask NPS to investigate and make available to the public the condition of housing units on ranches, subleasing of housing units by ranchers, and rents charged by ranchers for subleasing housing units.</p>
60074	<p>Commenters ask if NPS would identify and include short and long-term management goals and metrics into new lease/permits and if so, what science-based criteria would be applied to determine success. Commenters also suggest that NPS describe the process that would be used to update any goals or metrics in response to changed conditions.</p>
60091	<p>Commenters request that NPS include a draft lease template in the GMP Amendment and EIS. The commenter also asks NPS to meet with individual ranchers to discuss past lease provisions and new approaches that could be adopted to reflect important on-the-ground considerations.</p>
60103	<p>Commenters state that the NPS should require chemical types; storage techniques; and uses for pesticides, antibiotics, insecticides, herbicides to be disclosed in permits/leases.</p>
59991	<p>Commenters suggest longer lease/permit terms be considered. Recommended timeframes include 20-year lease/permit, 20-year rolling renewal agreement, 10-year lease option that can be exercised at every 20-year midterm, 5-year incremental extension, 25-30 year lease, 50-year lease, 60-year lease, 99-year lease, and life-time lease, with these terms applying if the ranch remains in compliance. Commenters recommend different lease/permit timeframes for dairy versus non-dairy ranches, suggesting 10-year lease/permits for non-dairy ranches and 20-year leases for dairies.</p>
59993	<p>Commenters question offering 20-year lease/permits to ranchers and suggest shorter terms, including annual lease/permits and 5-year lease/permits or 10-year leases that are consistent with other agencies such as Bureau of Land Management. Commenters state that 20-year leases are illegal because they do not comply with the National Environmental Policy Act and are inconsistent with NPS's policies on ranching.</p>
59997	<p>Commenters note that the 2012 Secretary of the Interior's letter recommended offering leases up to 20 years rather than for 20 years.</p>

Concern ID	Corresponding Concern Statement
60001a	Commenters express concerns regarding performance of operations and NPS enforcement of lease/ permits.
60001b	Commenters state that ranchers should be required to meet strict environmental standards and standards for organic and/or sustainable land management practices. Common stewardship practices could be pre-authorized to facilitate implementation and promote operational flexibility. Commenters also suggest that frequent lease/permit reviews are needed to respond to resource concerns. They offer a variety of suggestions regarding lease/permits conditions, including identifying site-specific practices; clearly stating responsibilities, timing, or locations for practices; and providing detailed budgets.
60011	Commenters ask how best management practices would be implemented, measured, and enforced and if the budget for enforcement would be increased.
60038	Commenters ask that NPS consider specific methods for permit valuation (e.g., charge a minimum annual rent/permit fee equal to current fees charged to park ranchers or charge a percent of the gross farm income). Commenters suggest that NPS could charge higher rates for ranchers with more intensive land use and keep the current rates stable for ranchers with small gross farm income.
60224	Commenters recommend developing a model of cooperation between a non-profit conservancy organization, such as the Marin Agricultural Land Trust (MALT), for-profit farms, and NPS, such as the model used at Cuyahoga Valley to oversee the operation of agricultural leases at the park.
60234	Commenters suggest that NPS institute models for dairy farms within Point Reyes to bring ranchers' farms to modern standards and that NPS should cancel the leases of farms that do not bring their farms up to these standards.

Table 25. ON1000 – Other NEPA Issues

Concern ID	Corresponding Concern Statement
60050	Commenters suggest that listing the Continued Ranching and Management of the Drakes Beach Tule Elk Herd with 20-Year Permits as the NPS' initial proposal suggests that the agency has already identified their preferred alternative.
60055	Commenters request that the GMP Amendment and EIS be as specific and detailed as possible to allow for later tiering, and that significant impacts be identified early in the process. The commenter notes that a one-size fits all approach will not work well, given the diversity of plant communities underlying the ranches.
60057	Commenters state that any conversion of land from agricultural management by a farm family to an alternative land use would increase the management demands of park staff. The commenter notes that with proposed budget cuts, any increase in staff would be difficult to provide.
60211	Commenters suggest that an updated climate change discussion be incorporated into the alternatives. Commenters note that digesters should be operated on all dairy farms to counteract climate change impacts. Funding could come through a pay-as-you-save model that is funded through energy income. Another commenter suggests that ranchers should be encouraged to implement carbon beneficial practices.

Table 26. PL1000 – Planning Process

Concern ID	Corresponding Concern Statement
60021	Commenters request that the information developed for the 2015 Ranch Comprehensive Management Plan be considered and used in the GMP Amendment and EIS process.
60022	Commenters suggest that the intent of Congress in extending Reservation of Use to ranchers enables the seller to continue to use and occupy the land after a Reservation of Use ends.
60025	Commenters remark on the enabling legislation for both Point Reyes National Seashore and Golden Gate National Recreation Area with respect to ranching.
60029	Commenters suggest that the alternatives be numbered for clarity and presented in a chart or matrix to allow the reader to easily understand which elements belong to which alternative(s).
60030	Commenters request information about the criteria and processes the park will use to (1) ensure preservation of natural resources and prevent habitat degradation in the pastoral zone, and (2) assess the alternatives, including how the preferred alternative will be selected. Commenters also ask what criteria and processes the park would use to preserve natural resources and prevent habitat degradation.
60032	<p>Commenters request that NPS address whether the ranches currently in the park are sustainable and what regulatory compliance is necessary.</p> <p>Several commenters suggest that the park should focus the planning process on the implementation of sustainable agricultural practices as a means to enhance cultural ecology of the pastoral zone and the park more generally, and maximize protection of both natural and cultural resources. Best management practices should look beyond resource protection to enhancing cultural and ecological resilience.</p>
60034	Commenters discussed how the GMP Amendment and EIS relates to the 1980 GMP. Specifically, commenters note that it is unclear if the 1980 GMP does not contain information on the North District of the Golden Gate Natural Resource Area that is being amended. Other commenters suggest that this planning process should result in a complete update to the 1980 GMP, rather than an amendment focused on ranchlands, and that the plan should articulate an overall vision for all resource types and land uses.
60039	Commenters request that NPS define terms whose meaning is not obvious, such as “diversification and operational flexibility,” in clear terms, and that both a glossary and index be provided in the GMP Amendment and EIS. Other terms to be defined include “sensitive resources,” “park resources,” “sustainable,” and “promotion of sustainable agriculture.”
60040	Commenters request several clarifications, including that “enhanced trail connections” be clarified and information provided on how trail connections would be enhanced in each alternative, clear graphic depictions of each alternative, and other map clarifications. One map shows a free range elk core use area that is not included in the planning area, and it is unclear how elk core use areas could not be included and yet evaluated as part of the GMP Amendment and EIS. Other commenters request maps showing the original ranching area by parcel ownership, current ownership, and a map of land characteristics.
60041	Commenters ask about establishment of baselines; specifically commenters ask about how baselines are established for new leases and natural conditions. Commenters suggest that the baseline for new leases should be the conditions and practices allowed in the existing leases, as long as the leaseholder has not violated their permits. Commenters also suggest that an appropriate baseline be established that recognizes that an environment with no human uses at Point Reyes has not existed for hundreds of years. There was also a

Concern ID	Corresponding Concern Statement
	request that NPS conduct studies on current conditions to determine an appropriate and robust environmental baseline.
60044	Commenters suggest that a slow planning process places financial strain on the ranchers because of ongoing uncertainty, and the planning process needs to be completed as quickly as possible.
60045	Commenters suggest that the park change its policies to encourage and strengthen long-term agricultural viability and quotes a 2009 letter from Senator Feinstein to the park and the Seashore Ranchers Association.
60047	Commenters state that the description of alternatives is misleading because it appears to assume the current extent of elk herds in the park is approved in the existing GMP.
60012	Commenters suggest that the GMP Amendment and EIS should provide updated information on the current condition of resources within the park and that the analysis should also include a discussion on pasture/range management, best management practices, succession, diversification, tule elk protection and management, terms and length of leasing, transparency in management, compliance, and ranching operations.

Table 27. PL2000 – Planning Area

Concern ID	Corresponding Concern Statement
60016	Commenters request that NPS clarify what lands are included in the planning area because overlaps in the formerly recognized pastoral zoning, current agricultural leasing, and inclusion of some natural and wilderness areas in the planning area are confusing.
60020	Commenters suggest expanding the planning area to include integrated resource management solutions that apply to regions outside the proposed planning area, including all of the lands within the Olema Valley and Point Reyes Historic Districts.

Table 28. PL3000 – Purpose, Need and Objectives

Concern ID	Corresponding Concern Statement
60008	Commenters state that the newsletter did not explicitly state the purpose and need for the GMP Amendment and EIS, which reduces the public's ability to adequately provide comments. They also suggest that NPS has not issued a foundation statement, as directed in NPS Management Policies 2006, and suggests that a GMP Amendment and EIS should apply to the entire park unit, not just a portion of it.
60010	Commenters suggest that the framework of the GMP Amendment and EIS include the long-term management of the 28,000-acre pastoral zone, which would include the overall goals for dairy and beef ranching activities with terms of at least 20 years.

Table 29. PL4000 – Consultation and Coordination

Concern ID	Corresponding Concern Statement
59996	Commenters provide suggestions for additional stakeholder involvement/coordination or request to be involved in the process moving forward to provide a wide variety of expertise. Stakeholder suggestions included the Marin Conservation League, Miwok tribe, Amah Mutsun Land Trust, Midpeninsula Open Space District, Pinnacles National Park, California Department of Parks and Recreation, California Native Grasslands Association, Marin Agricultural League, Marin Agricultural Land Trust, TomKat Ranch Educational Foundation, Marin Resource Conservation District, Marin County Agricultural Agencies as well as collecting information from researchers Barry and Rissman, the Point Blue Conservation Science, NRCS, and the University of California Cooperative Extension. Stakeholder requests included the Natural Heritage Institute.
60000	Commenters provided feedback on the public comment period and the materials provided, including providing a request for a public meeting and questioning where to find additional information. Commenters felt the materials did not provide sufficient detail for the public, including lack of alternative detail and no discussion on the type of impacts the NPS will analyze in the draft EIS. Commenters note the comment period was too short and request additional review time in the future.
60002	Commenters request a formal communication structure, such as a Ranchers Advisory Council, for NPS and the ranchers that would include developing guidelines and would provide clarity regarding decision-making authority. Commenters request an opportunity for ranchers and the park to collaborate and brainstorm to implement best management practices. Commenters request that the park disclose the number of meetings that have been held with various stakeholder groups since 2014 as part of the discussion for how the process will be an open dialogue moving forward.
60003	Commenters request that NPS clarify the role and authority of California state agencies in the GMP Amendment and EIS process, including the Coastal Commission, California Fish and Wildlife, and the Regional Water Quality Control Board.
60152	Commenters recommend that NPS establish a grazing advisory board that includes representatives of local and national conservation groups, ranchers, and scientists to regularly review progress in implementing the conditions found in the regenerative ranching option and recommend any changes needed to better protect the park.

Table 30. PL5000 – Succession Planning

Concern ID	Corresponding Concern Statement
59985	Commenters request that the GMP Amendment and EIS establish a procedure for lease succession within current ranching families to preserve ranching as a land use over the long term. Specific recommendations include transferring the lease to immediate family members (right of first refusal); allowing the lessee a decision-making role in lease transfer; having the option for interested parties to manage lands if the existing families are unable to continue; and allowing a rancher to define their own succession plan as part of the lease.
59989	Commenters suggest that non-life estate ranchers be provided an equal opportunity for future available leases after the original lessee no longer holds the lease. Several commenters suggest that once original owners are deceased, the park should retain ownership with the opportunity to preserve and interpret the historical ranching culture and public education or return the land to native grassland.

Concern ID	Corresponding Concern Statement
59998	Commenters ask for clarification on what would occur at the end of a 20-year lease/permit and for a definition of an existing ranch family.

Table 31. RF1000 – Suggested References

Concern ID	Corresponding Concern Statement
60143	Commenters provide additional references to be reviewed and considered during the preparation of the GMP Amendment and EIS associated with the following topics: cultural resources, socioeconomics, species of special concern, vegetation, public health and safety, soils and geology, wildlife and wildlife habitat, water resources, and climate change.