

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**FINAL SUPPLEMENT TO THE
RESOURCES MANAGEMENT PLAN
AND FINAL ENVIRONMENTAL IMPACT STATEMENT
FOR
IMPROVEMENT OF WATER QUALITY
AND CONSERVATION OF RARE SPECIES AND THEIR HABITATS
ON SANTA ROSA ISLAND**

CHANNEL ISLANDS NATIONAL PARK
Santa Barbara County, California

This final supplement to the final resources management plan and environmental impact statement for Santa Rosa Island proposes actions to 1) improve water quality in surface streams and protect riparian habitat areas on Santa Rosa Island, and 2) promote the conservation and recovery of rare species of plants and animals on Santa Rosa, as well as the habitats upon which they depend.

Description of the Action: Under Alternative F, Negotiated Settlement (the Proposed Action), water quality and riparian values would be improved and rare plants and their habitats would be conserved by a rapid removal of cattle and a phased removal of deer and elk from Santa Rosa Island. With the exception of 12 head in Lobo Pasture, all cattle would be removed from the island by the end of 1998. Deer and elk would be removed by the end of 2011, although they could be removed earlier if necessary to achieve recovery goals for selected listed species and their habitats, or if the permittee chooses to terminate their commercial hunting operations before that, for business reasons. After an initial reduction in deer and elk, an adaptive management program for deer and elk would be implemented. Under adaptive management, deer and elk would be managed at levels which would allow rare species and their habitats to recover. Provided recovery goals are met, Vail & Vickers will be allowed to conduct commercial hunting of deer and elk. After the adaptive management period, deer and elk populations would be eliminated during a final phaseout period. If, for some reason, an acceptable adaptive management program cannot be developed, deer and elk populations will be reduced at a pre-determined rate. As under Alternative D, the Park would implement road management actions to reduce impacts to island streams, and would develop a comprehensive alien plant management plan to address problems caused by alien species. The Park would develop monitoring programs for rare species, water quality and riparian recovery. Visitor access to Santa Rosa Island would be increased beyond current levels.

Summary of Environmental Impacts: Rapid removal of cattle would allow for rapid recovery of riparian areas and improvement in water quality in all drainages, and would remove some grazing pressure from rare plant species and their habitats. The permittee's cattle operation would be voluntarily terminated by implementation of this alternative. Adaptive management of deer and elk would augment recovery of indicator species and their habitats, because allowable deer and elk levels would be tied to attainment of recovery standards.

Implementation of Alternative F would have substantial, beneficial effects on soils, water quality and riparian areas, vegetation, wildlife, rare species and their habitats, and archeological resources. Implementation of this alternative would have no effect on historical resources, negligible effects on cultural landscapes, and slightly beneficial effects on ethnographic resources. Under this alternative, Vail & Vickers would have reduced revenues. This alternative would have both benefits and impacts to NPS operations. The Park would no longer bear the cost of overseeing cattle management actions after 1998, but would incur some additional costs under the adaptive management program for deer and elk, as well as additional costs associated with assisting Vail & Vickers with deer and elk removal.

Alternatives Considered: A) No Action; B) Minimal Action; C) Targeted Management Action; D) Revised Conservation Strategy; E) Immediate Removal of Ungulates, and F) Negotiated Settlement (the Proposed Action). Information on the other alternatives may be found in the Final RMP/EIS. A summary of the different elements in each alternative, including Alternative F, may be found in Table 1 in the Draft Supplement to the Final RMP/EIS. Similarly, a summary of the environmental consequences of each alternative, including Alternative F, may be found in Table 2 of the Draft Supplement to the Final RMP/EIS. These tables replace Tables 1 and 2 from the Final RMP/EIS.

Availability of the Draft Supplement to the Final RMP/EIS for public review was announced in the Federal Register of February 17, 1998, and the public review period ended April 17, 1998. All comments received have been reviewed and considered.

For further information, contact the Superintendent, Channel Islands National Park, 1901 Spinnaker Drive, Ventura, CA 93001, or by telephone at (805) 658-5700.

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FINAL SUPPLEMENT TO
FINAL RESOURCES MANAGEMENT PLAN FOR SANTA ROSA ISLAND

PREFACE

This document is an abbreviated final supplemental environmental impact statement (FEIS) and the material here is to be integrated with the Draft Supplement to the Resources Management Plan and Final Environmental Impact Statement for Santa Rosa Island of February 1998, and with the Final RMP/EIS of April, 1997, in order to be considered complete. The abbreviated format has been used because changes to the draft supplement are minor, do not result in any modification of the proposal or alternatives and do not result in new information that may have a significant effect on the environment. Use of this format is in compliance with the 1969 National Environmental Policy Act (P.L. 91-190) and the Council On Environmental Quality Regulations at 40 CFR 1503.4(c). The draft and final supplemental environmental impact statements together with the Final RMP/EIS describe the final plan, its alternatives, all significant environmental impacts, and the public comments that have been evaluated.

ERRATA

Public and agency review of the Draft Supplement has resulted in the need for one point of clarification in the text of the document, regarding visitor access to the reserved area and other sites traditionally used by Vail & Vickers:

A. Page 20, under AFFECTED ENVIRONMENT, Increased Visitor Opportunities:

The Draft Supplement states that, “The reserved area of the main ranch at Beecher’s Bay (approximately 8 acres), as specified in the deed of sale, is only open to visitation under Ranger escort. The remaining barn structures are accessible with Ranger permission.”

This statement conflicts with the reservation of non-commercial use and occupancy retained by Vail & Vickers. Visitor access to the reserved area is by permission of Vail & Vickers, and not the Park.

This statement also conflicts with a provision of the settlement agreement (the “Joint Stipulation and Order”) which prohibits visitors from entering the barns or other structures traditionally used by Vail & Vickers (Joint Stipulation and Order, p. 7):

11. Use of Areas: V&V may continue to use all buildings, corrals and approved crop-growing areas on SRI in the same manner as they have used those structures and areas in the past and the public will be prohibited from entering those areas. NPS will not occupy these buildings. Except as provided in this Joint Stipulation and Order, or by any other applicable law, regulation, written official policy or judicial order, V&V may continue to use the roads, pier, airstrip and other areas in the same manner as they have used those facilities and areas in the past. In addition, NPS will provide V&V with a map of areas where off-road vehicle traffic is prohibited to protect sensitive resources.

Accordingly, the Draft Supplement is revised to reflect the provision of the settlement, that visitors are prohibited from entering buildings, corrals, and approved crop-growing areas which Vail & Vickers have traditionally used, but which are located outside the 8 acre reserved area in Beecher’s Bay. This includes the main barn at Beecher’s Bay, the bunkhouse, lead cowboy house, and the outlying line camps, such as at Arlington Beef Trap, China Camp, and Wreck Camp.

CONSULTATION AND COORDINATION

Public Review of the Draft Supplement

Comments were received orally and in written form following the release of the Draft Supplement to the Final RMP/EIS in February 1998. All comments were examined and considered by the National Park Service according to the requirements of 40 CFR 1503 (the implementing regulations for the National Environmental Policy Act). Those comments which were “substantive”, and not simple statements for or against the proposal, are responded to in the chapter Response to Public Comments.

Record of Public Comment

A Notice of Availability was published in the Federal Register on February 17, 1998, for the Draft Supplement to the Final Resources Management Plan and Environmental Impact Statement for Improvement of Water Quality and Conservation of Rare Species and their Habitats on Santa Rosa Island. The 60-day comment period was to end on April 17, 1998. Approximately 400 copies of the Draft Supplement were distributed to public agencies (see list of agencies, below), special interest groups, businesses, and individuals.

Written Comments

During the comment period, a total of 9 letters were received from public agencies, special interest groups, businesses and individuals. Some of the letters contained substantive comments that required clarification of information in the Draft Supplement, modification of the text, or direct responses. The substantive comments are addressed by subject matter in a question and answer format (see Response to Public Comments chapter).

Agencies Which Received Copies of the Draft RMP/EIS

California Coastal Commission
California Department of Fish and Game
California Department of Parks and Recreation
Cachuma Resource Conservation District
California Regional Water Quality Control Board - Central Coast Region
Natural Resources Conservation Service
Santa Ynez Indian Reservation
State Historic Preservation Office
U.S. Environmental Protection Agency
U.S. Fish and Wildlife Service
U.S. Forest Service, Los Padres National Forest
U.S. Navy, Naval Air Weapons Stations, Pt. Mugu

RESPONSE TO PUBLIC COMMENTS

This chapter contains responses to substantive comments received by the National Park Service during the public comment period. The Park received 8 comment letters during the public comment period for the Draft Supplement, of which 7 contained substantive comments.

Substantive comments are defined as

- not simple statements for or against the proposal
- those requiring additional explanation or analysis of data
- those that debate facts or conclusions reached in the draft environmental impact statement

Comments have been arranged by broad topic category.

Cultural Resources

Comment Letters: Howarth

- Q. Establishment of a small demonstration ranch will be difficult once the cattle are removed from the island and the permittee's boat is no longer operational. The Supplement should discuss transition plans for establishing the demonstration ranch.

Details of the establishment and operation of a demonstration ranch have yet to be developed. There will be ample opportunity for transition with Vail & Vickers due to their continuing deer and elk operations. It is expected that planning for such a ranch will begin in the fall of 1998.

Deer and Elk Management

Comment Letters: Belnap, Cloud, California Native Plant Society

- Q. Who will pay for adaptive management of deer and elk? Since the continuation of hunting is for the permittee's benefit, the permittee, and not the NPS, should bear the costs of adaptive management.
- A. *The Park is splitting the costs of adaptive management with Vail & Vickers. This was agreed to as part of the negotiated settlement agreement.*
- Q. Although monitoring standards will be developed, there is no timetable given nor guidelines provided for their development. This should be clarified.
- A. *Guidelines and a timetable for development of ecological standards for adaptive management are given on page 8 of the Draft Supplement.*

- Q. The continued presence of up to 1200 deer and elk on the island for most of the next decade could have deleterious effects on island resources. Yet the only trigger for their management is the possible decline of two species, *Arctostaphylos confertiflora* and *Castilleja mollis*. Significant damage could occur to other species without affecting either of the two indicator species. Moreover, the management goal should be recovery of these species, not just survival.
- A. *Arctostaphylos and Castilleja were chosen as indicator species because they are two of the most heavily impacted species occurring on Santa Rosa Island, because those impacts have been unambiguously tied to deer and elk, because they occur in habitats which are generally impacted. For example, Arctostaphylos occurs primarily in the chaparral area near Black Mountain, which is the habitat preferred by deer, and most impacted by deer. Currently, Arctostaphylos individuals are heavily browsed with no apparent reproduction and recruitment. Improvement in the condition of Arctostaphylos will only occur if deer are no longer impacting the chaparral habitat as a whole. Since deer prefer chaparral habitat, relatively low deer numbers will be required to attain ecological standards for Arctostaphylos. Therefore, reduction of deer to population levels sufficiently low to allow improvements to chaparral habitat will also improve other woody plant communities frequented by deer.*

The ecological standards will be directed toward recovery of those species, and to this end must be approved by U.S. Fish and Wildlife Service. For each indicator species, standards will be developed to “effect biologically meaningful and beneficial changes in the status and trend of the species, and its habitats” (Draft Supplement, p. 8).

- Q. The ecological standards developed for adaptive management should be subject to public review.
- A. *Although the standards will be developed following publication of this final supplement, they will be made available for public review during the development, by U.S. Fish and Wildlife Service, of a recovery plan for the listed plant species of the northern Channel Islands.*
- Q. Extensive and effective ungulate enclosures should be established in a variety of island habitat types and sites, to provide controlled comparison between ungulate and non-ungulate management regimes.
- A. *The scientific panel has recommended that ungulate exclosures be constructed in chaparral habitat to determine the effect of ungulates on *Arctostaphylos confertiflora*. Two exclosures are currently being constructed, one near Black Mountain and one in chaparral habitat near South Point. Ungulate exclosures will also be established in *Castilleja mollis* habitat, Carrington Pasture and perhaps in Pocket Field.*

- Q. Remaining deer and elk could compromise riparian restoration projects by browsing vegetation planted or recovering in riparian areas. The Supplement should include criteria that would trigger management of deer and elk if such effects occur.
- A. *It is possible that deer and elk will be attracted to and will browse upon young plants growing in a recovering riparian area. If such impacts occur, individual seedlings may be caged, or targeted hunting may be implemented to mitigate such effects.*
- Q. The Draft Supplement provides no information on the specifics of continued commercial hunting such as guidelines for hunting (when and where it can be done) or effects on island resources such as endangered plants and animals, water quality, riparian areas, wetlands, or restrictions on visitor use during hunts. Will the hunting program be managed as it has in the past, under the total control and direction of Vail & Vickers?
- A. *The hunt may actually be more extensive than it has been in the past, in order to meet the deer and elk herd limits outlined in the Supplement. However, the negotiated settlement specifically calls for Vail & Vickers to manage the hunts for the least effect on Park operations: "Removal methods must be coordinated with NPS to avoid impacts to rare species, visitors, or park administration" (Joint Stipulation and Order, Tables 1 and 2).*
- Q. It is insufficient to monitor only two species of plants in order to determine deer and elk numbers. The final Supplement should include more specifics on monitoring plans for other resources and should include additional adaptive management measures that will be used to address and adverse impacts to them. If monitoring results show that elk or deer are damaging any resources, particularly other listed and rare species, elk and deer numbers should be further reduced or management should be otherwise adjusted as appropriate. Standards for resource condition should also specifically address impacts of off road vehicles and other hunting impacts.
- A. *Monitoring multiple resources would be costly and less effective than selecting and monitoring indicator species, such as the two listed species, which are the most heavily impacted by ungulates. The Park currently monitors a number of other resources (rare plants, vegetation communities, landbirds, weeds) but only the monitoring of the two designated indicator species will be linked to ungulate management.*
- Q. Although the Supplement provides for the right of Vail & Vickers to request mediation if they disagree with a decision to reduce deer and elk numbers on the island, the rest of the public has no such recourse to appeal a decision to maintain deer and elk numbers despite resource damage. The Final Supplement should include some mechanism for public review of monitoring results and for public appeals if the public feels that resource damage is not being adequately addressed.
- A. *Under the Freedom of Information Act, all such documents are public and may be requested from the Park after they become final. Additionally, the negotiated settlement*

states that NPS will provide the National Parks and Conservation Association with monitoring results and copies of decisions. The NPCA may be willing to share this information with the public, as well.

Fire Management

Comment Letters: Howarth, Laughrin

- Q. How can the Park propose using fire to re-establish the former extent of native perennial grasslands, when that former extent is not known? What is now annual grassland may not be representative of what was once native grassland prior to ranching and agriculture, but may have been woodland, chaparral, or scrub. Prescribing fire to enhance historic pasture may continue to restrict the recovery of native woodland and shrub in annual grasses.
- A. *The Draft Supplement (p. 17) states that NPS will test the use of fire as a restoration tool for native plant communities. It is not the sole tool to be used, nor is it intended to be used solely to restore native perennial grasslands. For example, the Park conducted a prescribed burn in Old Ranch Pasture in 1997. The goal was not specifically to increase native perennial grasses, but rather to reduce annual grass cover and seedbank. Our botanists agree that the areas now covered by alien annual grasslands were probably originally woodland, shrubland or chaparral. Native grasslands were probably relatively small areas that occurred in a matrix with other plant communities. The Park will not use prescribed fire to “enhance historic pasture”.*
- Q. The statement in the Draft Supplement that chaparral and Bishop pine stands would likely show marked rejuvenation after burning is unsubstantiated. On Santa Cruz Island, Bishop pines have not rejuvenated following a prescribed burn, but in two other areas Bishop pines are regenerating and spreading in the absence of fire. Prescribed fire may not be necessary to promote pine forest, chaparral and scrub on Santa Rosa.
- A. *We agree that the removal of grazing and reduction of browsing will allow Bishop pines to regenerate, at least in the sense that seedlings will not be consumed by ungulates. But fire may be required for reproduction of *Arctostaphylos confertiflora*, which is burl-forming, as are other fire-dependent chaparral species. However, due to likely predation by deer on seedling and resprouts, fire will not be used as a tool in woodlands until all deer are removed.*
- Q. Island flora may have evolved with a lower fire frequency than on the mainland, and it may be inappropriate to use prescribed burning to establish a high frequency fire regime on the islands.
- A. *We agree that the existing scientific evidence indicates a lower natural fire frequency on the islands than on the mainland. The Park has not proposed to use prescribed fire as a surrogate for a high frequency fire regime. Prescribed fire will be used primarily as a*

management tool, to reduce alien annual grass cover and seedbank, and to encourage regeneration of chaparral species.

- Q. What is the “natural” role of fire on the islands? Charcoal sediment cores have not yet been analyzed to establish the historical role of fire on the islands. How will intentionally burning grasslands, chaparral and pine allow these communities to recover fuel loads to burn “naturally”? The Park should delay decision-making about fire management until scientific and historical evidence is reviewed, and until careful, small-scale experiments are conducted on the effects of fire.
- A. *The Park is currently conducting small-scale experiments with fire on Santa Rosa Island, as is The Nature Conservancy on Santa Cruz Island. The results from these studies will be used to guide fire management activities.*

Goals and Objectives

Comment Letters: Laughrin

- Q. Does the RMP only consider management until the year 2011, or does it extend beyond that?
- A. *The RMP does not proscribe management actions beyond the year 2011, since the plan is primarily concerned with management of non-native ungulates, which will be removed from Santa Rosa by the end of 2011 (except for a small number of livestock used in a demonstration ranch).*
- Q. Will additional plans be developed for issues other than livestock impacts, rare plants and water quality? What about vertebrate and invertebrate species?
- A. *At this point in time, the Park has no plans to develop specific management plans for other resources. However, the Park’s overall resources management plan, which guides the management of Park natural and cultural resources and is updated annually, considers management, monitoring and research for nearly all significant Park resources, both natural and cultural.*

Grazing Management

Comment Letters: Cloud

- Q. The Supplement allows for continued use of Old Ranch Pasture by both cattle and horses. No livestock should be allowed in Old Ranch Pasture until adequate mechanisms exist to protect sensitive resources.
- A. *Under the actions proposed in the Draft Supplement, no cattle will be allowed in Old Ranch Pasture, but 12 horses will be allowed until 2011. Our restoration specialists do not anticipate major impacts from these horses on recovering riparian vegetation or other resources. Horses do not frequent riparian areas as cattle do. Nonetheless, the Park and Vail & Vickers are prepared to implement mitigation measures (see p. 6 of the Draft Supplement) to prevent horses from significantly impacting resources in Old Ranch Pasture.*

Monitoring

Comment Letters: National Parks and Conservation Association

- Q. The monitoring for adaptive management of deer and elk, focused on the indicator species *Arctostaphylos confertiflora* and *Castilleja mollis*, should be coordinated with the existing rare species monitoring conducted by the Park.
- A. *Dr. Kathryn McEachern of USGS-Biological Resources Division is currently conducting population monitoring of rare plant species on Santa Rosa Island. The scientific panel assigned to develop indicator species monitoring for adaptive management of deer and elk is consulting with her regarding such monitoring, and the annual monitoring may be actually be implemented by Dr. McEachern and her staff.*
- Q. The Supplement should include monitoring plans and/or schedules for other rare and listed species, plant communities, soil conditions, riparian communities, and other resources.
- A. *Although the RMP commits the Park to such monitoring (p. 16), it is beyond the scope of the RMP to present such monitoring plans in detail. Several monitoring programs (rare plant monitoring, riparian monitoring) are still being developed. The Park lacks a soil survey for Santa Rosa Island and has no current plans to monitor soils. The Park has been conducting annual monitoring of vegetation communities since 1988, and will continue to do so.*
- Q. The Park should expedite development and implementation of a comprehensive monitoring program for rare species and native plant communities, and this plan should be made available for public review.
- A. *Dr. Kathryn McEachern of USGS-Biological Resources Division is developing monitoring methods for rare plant species. Initial results of both her rare plant surveys*

and population demography monitoring have been published (McEachern 1996, McEachern et al. 1997).

- Q. Monitoring programs should include specific methods to monitor impacts of hunting activities, including off road vehicle use, on resources.
- A. *Off-road vehicle use is prohibited in the two pastures with the most sensitive resources, Carrington and Old Ranch (see p. 21 of Draft Supplement).*

Rare Species

Comment Letters: Vail & Vickers

- Q. Scientific consensus is that only one plant species, *Arabis hoffmannii*, is thought to be declining.
- A. *See the final listing package for the northern Channel Islands (USFWS 1997) for evidence to the contrary.*

Restoration

Comment Letters: Cloud

- Q. To restore the island's deeply degraded structural geomorphology, NPS should install structural improvements such as dams and revetments, combined with significant revegetation.
- A. *The Park is initiating a pilot riparian restoration program in Quemada, Windmill and Cherry drainages, where the low stream gradients afford the greatest chance for successful revegetation, channel stabilization, and recovery of riparian function. The Park will use the results of this pilot study to guide riparian restoration in other drainages on the island. However, efforts will first be focused on low-gradient reaches, where revegetation efforts will not be compromised by high-energy flood events during winters of high precipitation. Initiating work in high-energy, high-gradient reaches will await results from work in low-gradient reaches.*

Soils

Comment Letters: Vail & Vickers

- Q. Current grazing and game do not contribute to present rates of erosion, and so their removal will not slow erosion rates.

- A. *The rapid riparian assessment team convened by the Park to assess riparian functionality in the island's streams concluded that continuous grazing in riparian areas by cattle in riparian systems contributed to erosion and sediment transport (Rosenlieb et al 1995, p. 11):*

There is little question that the amount of erosion associated with channel and arroyo widening during the large winter storms of 1995 was influenced by grazing in the riparian zone and the consequent status of riparian vegetation on inner-channel banks and on the arroyo floor. Had riparian vegetation conditions been adequate to permit proper riparian area function, main channel flows would have spilled out of the inner-channels onto the arroyo floor without enlarging them. Thus the arroyo floor should have functioned more effectively as a floodplain, both by dissipating the erosive energy of flows and by inducing floodplain sediment deposition.

Vegetation

Comment Letters: Vail & Vickers

- Q. Much of the island is in outstanding condition. Native plants are not threatened by grazing.
- A. *See the description of Santa Rosa Island's vegetation in the Affected Environment chapter of the Final RMP/EIS (p. 54) and the Conservation Strategies Document (Coonan et al. 1995) for summaries of the status and condition of vegetation communities on Santa Rosa Island, and effects of alien ungulates on same.*

Visitor Use

Comment Letters: National Parks and Conservation Association, Laughrin, Vail & Vickers

- Q. If visitor use is restricted during deer and elk hunts, the public should be given ample notification so that conflicts with visitor use are minimized. Moreover, scheduled hunts should not interfere with monitoring for rare plants, water quality or riparian recovery.
- A. *The public will be given advance notice of all hunts or deer and elk management actions that may require temporary restrictions on visitor use to ensure public safety. Such management actions will be coordinated so as not to interfere with Park monitoring, research, or restoration actions.*
- Q. If visitor access and visitation will increase because of this plan, will there be monitoring of impacts due to visitors? Will a management plan be developed for such impacts?

- A. *The Park conducts general monitoring of visitor impacts on Santa Rosa, as on other Park islands. We do not anticipate developing a specific management plan for such impacts.*
- Q. The Draft Supplement conflicts with the settlement agreement concerning visitor access to sites which have traditionally been used by Vail & Vickers (such as buildings, corrals and crop-growing areas) but which are outside the 8 acre reserved area. The negotiated agreement states that Vail & Vickers will continue to use such areas as they have been, and that the public will be prohibited from entering those areas. However, the Supplement states that visitors will be allowed with a Ranger's permission into barn areas outside the reserved area.
- A. *The Draft Supplement erroneously states that visitors may enter such buildings, which, as pointed out, conflicts with the following provision of the settlement agreement:*

10. Use of Areas: V&V may continue to use all buildings, corrals and approved crop-growing areas on SRI in the same manner as they have used those structures and areas in the past and the public will be prohibited from entering those areas. NPS will not occupy these buildings. Except as provided in this Joint Stipulation and Order, or by any other applicable law, regulation, written official policy or judicial order, V&V may continue to use the roads, pier, airstrip and other areas in the same manner as they have used those facilities and areas in the past. In addition, NPS will provide V&V with a map of areas where off-road vehicle traffic is prohibited to protect sensitive resources.

Accordingly, the Draft Supplement is revised to reflect this provision of the settlement: visitors are prohibited from entering buildings, corrals, and approved crop-growing areas which Vail & Vickers have traditionally used, but which are located outside the 8 acre reserved area in Beecher's Bay. This includes the main barn at Beecher's Bay, the bunkhouse, lead cowboy house, and the outlying line camps, such as at Arlington Beef Trap, China Camp, and Wreck Camp.

- Q. The Draft Supplement states that Park Rangers may escort visitors onto the 8-acre reserved area. Because this area was not deeded to the Park, the Park does not have authority to give visitors permission to enter this area.
- A. *Although Vail & Vickers transferred the entire island to NPS, including the 8-acre parcel, Vail & Vickers retained a 25-year reservation of non-commercial use and occupancy over the 8-acre reserved area. We have modified the RMP to clarify that visitors will not be allowed in the reserved area.*

COMMENT LETTERS RECEIVED

The following section reproduces those comment letters which contained substantive comments.

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