

National Park Service
U.S. Department of the Interior

Point Reyes National Seashore
California



Ranch Comprehensive Management Plan Environmental Assessment

Point Reyes National Seashore

Public Scoping Comment Analysis Report

September 2014

[This page intentionally left blank.]

CONTENTS

| | |
|--|-----|
| INTRODUCTION | 1 |
| PUBLIC SCOPING FOR THE RANCH COMPREHENSIVE MANAGEMENT PLAN/ EA | 1 |
| DEFINITION OF TERMS | 2 |
| COMMENT ANALYSIS METHODOLOGY | 2 |
| GUIDE TO THIS REPORT | 3 |
| HOW WILL MY COMMENT BE USED? | 3 |
| HOW DO I FIND MY CORRESPONDENCE? | 4 |
| HOW WAS MY CORRESPONDENCE CODED? | 4 |
| CONTENT ANALYSIS REPORT | 4 |
| CONCERN REPORT | 11 |
| PUBLIC SCOPING COMMENT SUMMARY | 31 |
| APPENDIX A: INDEX BY ORGANIZATION TYPE REPORT | A-1 |
| APPENDIX B: INDEX BY CODE REPORT | B-1 |
| APPENDIX C: PUBLIC SCOPING MEETING HANDOUTS | C-1 |

[This page intentionally left blank.]

INTRODUCTION

Public scoping is the process by which the National Park Service (NPS) solicits public input on the scope of issues and alternatives to be addressed in a National Environmental Policy Act (NEPA) document, such as an environmental assessment (EA). It is a process open to the general public that is conducted early in the NEPA planning process. Public scoping can include meetings and mailings to educate the public on the project and on the planning process guiding the preparation of an EA. It also instructs the public on how to provide comments on the project. After the public scoping period ends, the NPS uses an established protocol to analyze and summarize the public comments received during the scoping period. The NPS uses this summary—in addition to other relevant law, policy, planning documents, and scientific literature—to determine the scope of the EA.

Point Reyes National Seashore (the park) held a public scoping period for the Ranch Comprehensive Management Plan/EA (Ranch CMP) from April 21, 2014, to June 2, 2014. During this time, two open house meetings were held at different locations in the vicinity of the park. The public was encouraged to submit comments through the NPS's Planning, Environment, and Public Comment (PEPC) website (<<http://parkplanning.nps.gov/pore>>). Comments were also accepted at the meetings, by postal mail, and in person at the park. More than 3,000 pieces of correspondence were received during the public scoping period for this Ranch CMP. Additional detail is provided in this report. This report describes the public scoping process for this Ranch CMP and presents the analysis and summary of public comments received.

PUBLIC SCOPING FOR THE RANCH COMPREHENSIVE MANAGEMENT PLAN/ EA

The public scoping period was open for a total of six weeks between April 21, 2014, and June 2, 2014. The NPS issued a press release to more than 25 Bay Area media outlets as well as to the Los Angeles Times on April 21, 2014, announcing the dates, times, and places of the public scoping meetings. The NPS opened the public comment period for initial scoping on April 21, 2014. On that date, the NPS sent a scoping letter to more than 350 interested individuals and organizations notifying them of the opportunity to comment, and the NPS PEPC website (<<http://parkplanning.nps.gov/pore>>) was activated for the public to submit comments. Two public scoping open houses were held during the comment period at the following locations:

- May 6, 2014: Dance Palace Community Center, Point Reyes Station, California
- May 7, 2014: Bay Model Visitor Center, Sausalito, California

A total of 178 people attended the two meetings (126 people attended the meeting at Point Reyes Station, and 52 attended the meeting in Sausalito).

At each meeting, the NPS provided handouts (see Appendix C), both in English and Spanish, which included information about the background of the project, proposed purpose and need, proposed plan objectives, issues, tule elk, best management practices (BMPs), potential impact topics, NEPA process, commonly asked questions, and information on how to comment, including directing comments to the NPS's PEPC website. This information was also displayed on boards at each meeting venue. 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.

Attendees at these public meetings were able to provide comments both verbally and in writing. Flip charts to capture verbal comments in writing were set up at each venue along with the informational

boards. Writing stations were also provided at each meeting where attendees could sit, write down their comments, and submit the form into a box. Computer stations were also available where attendees could access the NPS PEPC website to submit comments directly. Attendees also were welcome to submit into the provided boxes any written comments they had brought with them. Comment forms could also be taken home and mailed later.

During the scoping period, more than 3,000 pieces of correspondence were entered into the PEPC system. The PEPC system is a database that the NPS uses to analyze and summarize public scoping comments. Interested parties were encouraged to enter their comments directly into PEPC. NPS staff entered hard copies received at the public meetings, by postal mail, or in person at the park into PEPC. Flip chart comments for each of the two public meetings were entered into PEPC as a single piece of correspondence for each meeting. There is one correspondence from the first public meeting in Point Reyes Station, and one correspondence from the second public meeting in Sausalito. All correspondences are included on the park's Ranch CMP website at: http://www.nps.gov/pore/parkmgmt/planning_ranch_cmp.htm.

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 postal 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 scoping process and are used to track major subjects.

Concern: Concerns are statements that summarize the issues identified by each code. Each code was further characterized by concern statements to provide a better focus on the content of comments. Some codes required multiple concern statements, while others did not. In cases where no comments were received on an issue, the code was not identified or discussed in this report.

Quotes: Representative quotes have been taken directly from the text of the comments received from the public and further clarify the concern statements. Quotes have not been edited for grammar.

COMMENT ANALYSIS METHODOLOGY

Correspondence was received by hard copy letter via postal mail or delivered in person at the park, comment sheet 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 by email, through the postal 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.

Once all the correspondence was entered into PEPC, each was read, and specific comments within each unique correspondence were identified. Nearly 3,000 comments were derived from the correspondence

received. 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. A total of 35 codes were used to categorize all of the public scoping comments received. An example of a code developed for this project is *IT3000 – Impact Topic: Floodplains, Wetlands, Riparian Areas*. 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. It should be noted that the impact topics brought up in the public scoping comments are unlikely to be the only topics considered in the Ranch CMP. Impact topics to be considered in the Ranch CMP will be informed not only by the public comments but also by a number of other influences.

GUIDE TO THIS REPORT

This report is organized as described below. The *Content Analysis Report* and the *Concern Statement Report* are provided in the following sections of this document. Additional PEPC reports and the full list of correspondence are provided as appendices. For more information on how to find a particular correspondence, see the “How do I find my correspondence?” instructions below.

Content Analysis Report: This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code and various demographics.

Concern Statement Report: This report summarizes the comments received during the public scoping process. In the report, comments are organized by codes and further organized into concern statements. Representative quotes are provided for each concern statement. A list of concern statements, in table format, is provided at the beginning of the *Concern Statement Report* section for quick reference.

Index by Organization Type Report: This report provides a listing of all groups that submitted comments, arranged and grouped by the following organization types (and in this order): non-profit/organization, government, university, and unaffiliated (if the commenter was not affiliated with any of the aforementioned organization types).

Index by Code Report: This report lists which commenters or authors (identified by organization type if they were commenting in an official capacity) commented on which topics, as identified by the codes used in this analysis.

HOW WILL MY COMMENT BE USED?

As described above, all comments are categorized into concern statements, such as “The Ranch CMP should consider that the ranches in the pastoral zone are operated in an environmentally sound way” and “Commenters would like the Ranch CMP to consider an alternative with lease regulations modeled on the Cuyahoga Valley National Park's ‘Countryside Initiative.’ ” These concerns are listed in the *Concern Statement Report* section of this document. These concerns will guide the alternatives, issues, impact topics, and references to be considered during drafting of the Ranch CMP.

This report is a summary of public comments received during the public scoping period for the Ranch CMP. This report, including the comments in this report, has not been screened for consistency with NPS law and policy, or for whether a particular comment is within the scope of the Ranch CMP.

HOW DO I FIND MY CORRESPONDENCE?

If you would like to find your individual correspondence, follow these steps:

- 1) Use the *Correspondence ID by Author Report* on the project website (<http://www.nps.gov/pore/parkmgmt/planning_ranch_cmp.htm>) to look up the Correspondence ID for a particular author. This report is organized by the author's last name.
- 2) Use the Correspondence ID to find the full correspondence on the project website (http://www.nps.gov/pore/parkmgmt/planning_ranch_cmp.htm). The *Correspondence List* is organized by Correspondence ID.

HOW WAS MY CORRESPONDENCE CODED?

If you would like to see how your correspondence was coded, follow these steps:

- 1) As above, use the *Correspondence ID by Author Report* (on the project website) to look up Correspondence ID for a particular author. This report is organized by the author's last name.
- 2) Use the Correspondence ID to find the matching ID number in the *Index by Organization Report* (Appendix B). This list is categorized by organizations; however, if an author was not submitting a comment in an official capacity, the Correspondence ID can be found in the "Unaffiliated Individual" category.

CONTENT ANALYSIS REPORT

Correspondence Distribution by State

| State | Percentage | Number of Correspondences |
|---------|------------|---------------------------|
| CA | 25.7 % | 794 |
| Unknown | 12.2 % | 376 |
| NY | 8.7 % | 268 |
| FL | 5.7 % | 176 |
| TX | 3.8 % | 119 |
| NJ | 3.0 % | 94 |
| IL | 2.7 % | 82 |
| CO | 2.6 % | 80 |
| PA | 2.4 % | 75 |
| WA | 2.4 % | 75 |
| MA | 2.2 % | 68 |
| AZ | 2.1 % | 65 |
| MI | 1.9 % | 58 |
| OH | 1.7 % | 54 |
| VA | 1.7 % | 54 |
| MD | 1.7 % | 52 |
| OR | 1.5 % | 45 |
| CT | 1.4 % | 42 |

| | | |
|----------------|-------|--------------|
| NC | 1.2 % | 38 |
| GA | 1.2 % | 36 |
| IN | 1.1 % | 33 |
| WI | 1.0 % | 32 |
| TN | 0.9 % | 27 |
| MN | 0.9 % | 27 |
| NV | 0.8 % | 26 |
| NM | 0.8 % | 26 |
| SC | 0.8 % | 24 |
| ME | 0.7 % | 21 |
| MO | 0.7 % | 21 |
| AR | 0.5 % | 15 |
| IA | 0.5 % | 15 |
| NH | 0.4 % | 12 |
| MT | 0.4 % | 12 |
| KY | 0.4 % | 11 |
| DC | 0.4 % | 11 |
| AL | 0.4 % | 11 |
| HI | 0.4 % | 11 |
| AK | 0.4 % | 11 |
| NE | 0.3 % | 10 |
| KS | 0.3 % | 10 |
| LA | 0.3 % | 10 |
| DE | 0.3 % | 9 |
| OK | 0.3 % | 8 |
| ID | 0.2 % | 7 |
| UT | 0.2 % | 7 |
| WV | 0.2 % | 6 |
| VT | 0.2 % | 6 |
| RI | 0.2 % | 5 |
| MS | 0.2 % | 5 |
| ND | 0.2 % | 5 |
| WY | 0.1 % | 4 |
| SD | 0.1 % | 2 |
| Not Applicable | 0.0 % | 1 |
| Guam | 0.0 % | 1 |
| Total | — | 3,093 |

Correspondence Distribution by Country

| Country | Percentage | Number of Correspondences |
|--------------------------|------------|---------------------------|
| United States of America | 86.8% | 2,684 |
| Great Britain | 2.1% | 66 |

| | | |
|----------------|------|----|
| Canada | 1.4% | 42 |
| Australia | 1.2% | 36 |
| France | 0.9% | 28 |
| Italy | 0.8% | 26 |
| Spain | 0.6% | 20 |
| Germany | 0.6% | 20 |
| Belgium | 0.4% | 12 |
| South Africa | 0.4% | 11 |
| India | 0.4% | 11 |
| Brazil | 0.3% | 10 |
| Netherlands | 0.3% | 10 |
| Argentina | 0.3% | 10 |
| Austria | 0.3% | 8 |
| Mexico | 0.3% | 8 |
| Russia | 0.2% | 7 |
| Poland | 0.2% | 7 |
| Columbia | 0.2% | 6 |
| Greece | 0.2% | 6 |
| New Zealand | 0.2% | 5 |
| Denmark | 0.1% | 4 |
| Sweden | 0.1% | 4 |
| Singapore | 0.1% | 4 |
| Switzerland | 0.1% | 4 |
| Malaysia | 0.1% | 3 |
| Malta | 0.1% | 3 |
| Chile | 0.1% | 3 |
| Croatia | 0.1% | 3 |
| Portugal | 0.1% | 3 |
| Ukraine | 0.1% | 2 |
| Bulgaria | 0.1% | 2 |
| Botswana | 0.1% | 2 |
| Slovenia | 0.1% | 2 |
| Romania | 0.1% | 2 |
| Serbia | 0.1% | 2 |
| Ireland | 0.0% | 1 |
| Philippines | 0.0% | 1 |
| Japan | 0.0% | 1 |
| Belarus | 0.0% | 1 |
| Czech Republic | 0.0% | 1 |
| Peru | 0.0% | 1 |
| Turkey | 0.0% | 1 |
| Norway | 0.0% | 1 |
| Nepal | 0.0% | 1 |
| Reunion | 0.0% | 1 |

| | | |
|----------------------|------|--------------|
| Slovakia | 0.0% | 1 |
| Honduras | 0.0% | 1 |
| Finland | 0.0% | 1 |
| Niue | 0.0% | 1 |
| El Salvador | 0.0% | 1 |
| Latvia | 0.0% | 1 |
| United Arab Emirates | 0.0% | 1 |
| Total | | 3,093 |

Correspondence Count by Organization Type

| Organization Type | Correspondences |
|---------------------------------|-----------------|
| Business | 27 |
| Government | 7 |
| Non-profit/Organization | 40 |
| Unaffiliated Individual | 3,015 |
| University/Professional Society | 4 |
| Total | 3,093 |

Correspondence Distribution by Correspondence Type

| Type | Number of Correspondences |
|--------------|---------------------------|
| Web Form | 3,019 |
| Letter | 62 |
| Park Form | 10 |
| Other * | 2 |
| Total | 3,093 |

* Flip charts from public meetings.

Comment Distribution by Code

(Note: Each comment may have multiple codes.)

| Code | Description | Total |
|--------|--|-------|
| AL100 | Alternatives: Agriculture and Agricultural Leases | 2,276 |
| AL200 | Alternatives: Elk Management | 1,940 |
| IS1400 | Issues: Tule Elk Management on Ranchlands (past, present, and future) | 1,244 |
| PN2000 | Purpose And Need: Park Purpose And Significance | 1,055 |
| IS1150 | Issues: Agriculture and Agriculture Leases (past, present, and future) | 330 |
| MT1000 | Miscellaneous Topics: General Comments | 210 |
| IT2300 | Impact Topic: Visitor Use, Experience, and Recreation | 156 |
| IT1900 | Impact Topic: Visual/Aesthetic Resources | 144 |
| AL150 | Alternatives: Ranch Operations, Activities, and Management | 80 |

| | | |
|--------------|---|--------------|
| AL300 | Alternatives: Other/New Alternatives or Elements | 53 |
| IS1100 | Issues: Ranch Operations, Activities, and Management (past, present, and future) | 44 |
| CC1000 | Consultation and Coordination: General Comments | 36 |
| IT1400 | Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk) | 35 |
| IT1100 | Impact Topic: Water Quality and Quantity | 9 |
| PO1000 | Park Operations: Guiding Policies, Regs And Laws | 2 |
| IS1300 | Issues: Natural Resource Management (past, present, and future) | 24 |
| IT1600 | Impact Topic: Vegetation (including dunes and non-native plant species) | 15 |
| IS1000 | Issues: Environmental Baseline Conditions | 13 |
| IS1200 | Issues: Cultural Resource Management (past, present, and future) | 12 |
| IT1300 | Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed) | 12 |
| IT2000 | Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures | 11 |
| PN1000 | Purpose And Need: Planning Process And Policy | 10 |
| IT1500 | Impact Topic: Tule Elk (not relating to management) | 10 |
| PN8000 | Purpose And Need: Objectives In Taking Action | 9 |
| ON1000 | Other NEPA Issues: General Comments | 8 |
| PN7100 | Purpose and Need: Purpose and Need for Taking Action | 8 |
| IT2200 | Impact Topic: Socioeconomic Resources | 7 |
| IT1800 | Impact Topic: Greenhouse Gas Emissions and Climate Change | 7 |
| IT1000 | Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries) | 6 |
| IT1200 | Impact Topic: Floodplains, Wetlands, Riparian Areas | 6 |
| RF1000 | References: Suggested References | 6 |
| IT2700 | Impact Topic: Other/New Impact Topics | 6 |
| IT2500 | Impact Topic: Wilderness | 6 |
| IT2100 | Impact Topic: Ranch Complexes (not relating to management) | 3 |
| DC1000 | Duplicate Comment: Duplicate of Existing Comment | 3 |
| IT2600 | Impact Topic: Park Operations | 2 |
| IT2400 | Impact Topic: Health and Safety | 1 |
| Total | | 7,799 |

[This page intentionally left blank.]

[This page intentionally left blank.]

CONCERN REPORT

As described above, this report summarizes the comments received during the public scoping period for the Ranch CMP. Table 1 provides a concise list of concern statements by code for quick reference. It is followed by the full concern report from PEPC, which includes representative quotes.

| Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement | |
|---|---|
| AL100 - Alternatives: Agriculture and Agricultural Leases | |
| Concern ID: 51732 Page 31 | One commenter would like the Ranch CMP to consider an alternative lease term that supports the adoption of farming practices that are considered ecologically sustainable and provide financial and/or other incentives to ranchers for BMPs that provide environmental benefits. |
| Concern ID: 51726 Page 31 | Commenters stated that the Ranch CMP should consider an alternative that discontinues and phases out ranching and all lease/permits on the park. Alternative lease terms were suggested that included a phase out after 10 years and conditions on leases that would phase them out unless they can demonstrate that a specific individual lease/permit is an essential and positive addition to the natural resources of the park. Other suggestions included a competitive bid lease/permit process and buyouts to willing groups for the purpose of returning the lands to their former wildlife status. |
| Concern ID: 51727 Page 33 | Commenters stated that the Ranch CMP should consider an alternative to restore lands taken out of agriculture back to agricultural use and offer long-term, self-renewing or "rolling" lease/permits to ranchers with consistent standards for practices that allow diversity of agricultural activities. |
| Concern ID: 51728 Page 34 | Commenters made specific requests pertaining to their personal lease/permits. One submitted an application for a new special use permit (SUP) while the other stated that they were reinstating their first right of refusal on grazing rights. |
| Concern ID: 51730 Page 34 | Commenters would like the Ranch CMP to consider an alternative that defines a process or guidelines for lease/permit succession to ensure the future of ranching and farming at Point Reyes National Seashore and in Marin County. |
| Concern ID: 51731 Page 35 | Commenters would like the Ranch CMP to consider an alternative with lease regulations modeled on the Cuyahoga Valley National Park's "Countryside Initiative." |
| Concern ID: 51734 Page 36 | Commenters stated that, during the development of alternatives, the Ranch CMP should consider establishing a set of transparent rules/regulations, goals, and actions that are applied consistently across all lease/permits, including: providing a consistent evaluation tool; enforcing accountability for non-compliance of rules/regulations; publically releasing residual dry matter (RDM) on an annual basis; ensuring transparency of information of discounts offered to lease/permit holders along with rationale for offering discounts; providing incentives to ranchers the provide environmental services not required by lease/permit; and reevaluating of stocking rates. Commenters also suggested development of a mechanism to monitor and repair fences. One commenter stated that, during the development of alternatives, the Ranch CMP should reassess the criteria for AUM allowed in lease/permits. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|------------------------------|---|
| Concern ID: 51735 Page 38 | Commenters stated that a range of lease/permit prices, terms and fees should be considered based on various factors, including: fair market value, income of ranchers, commodity prices, financial viability of a ranch operation, number of cattle, and grazing area. One commenter indicated that the Ranch CMP should consider an alternative that reduces lease prices for ranchers that are adversely affected by tule elk. Another commenter made several suggestions relating to lease/permits, including: conducting appraisals for AUM FMV annually with comparisons of discounts; having permits based on FMV, which include differences in ranches; ensuring that homes are based on FMV; assessing ranch insurance as it relates to FMV; assessing the possessory tax as it relates to FMV; accruing cost recovery amount (CRA)-FMV after FMV charges with the difference going to the agriculture subsidy; and calculating the annual CRA needed to fund agriculture monitoring and mitigation. One commenter suggested that the Ranch CMP consider an alternative that streamlines the lease process. |
| Concern ID: 51737 Page 40 | Commenters indicated that the park needs to determine the length of lease/permits. One commenter suggested that longer leases would encourage good stewardship among ranchers. Other commenters suggested shortening leases to one or two years. |
| Concern ID: 51739 Page 40 | One commenter stated that the Ranch CMP should clarify that the pastoral zone is not exclusively for agricultural use but also for natural resource protection and recommend a new description of "pastoral zone." |
| Concern ID: 51740 Page 41 | Commenters stated that the Ranch CMP should consider an alternative that includes changes to lease boundaries as needed to manage natural resources throughout the term of the lease/permit. |
| Concern ID: 51741 Page 42 | Commenters stated that the Ranch CMP should consider an alternative that includes a review of ranching operations to determine if a lease/permit area is compatible with a free-roaming tule elk herd. If so, the elk should not be disturbed or negatively impacted on those lands. |
| Concern ID: 51744 Page 42 | One commenter stated that SUPs should quantify damage due to wildlife. |
| Concern ID: 51746 Page 43 | One commenter indicated that the NPS should clearly state in the Ranch CMP its intention to maintain the pastoral zone designation. |
| Concern ID: 51747 Page 43 | One commenter stated that lease/permit conditions should require several components, including: the protection of sensitive resources (through the use of exclusionary cattle fencing) and the enforcement of RDM requirements. Further, this commenter stated that the definition of AUM should be updated. |
| Concern ID: 51748 Page 43 | One commenter stated that no compensation or incentive should be provided to ranchers for impacts from tule elk because the low lease/permit AUM and acreage provide adequate compensation. |
| Concern ID: 51749 Page 43 | One commenter stated that short- and long-term goals developed for leases should be based on science-based criteria. |
| Concern ID: 51750 Page 44 | One commenter suggested that the Ranch CMP provide a provision and process for formal public complaints related to non-compliance of lease terms and BMPs. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| AL150 - Alternatives: Ranch Operations, Activities, and Management | |
|---|--|
| Concern ID: 51835 Page 44 | Commenters provided support and suggestions regarding managing ranching operations related to forage and silage (including requirements for managing organically certified livestock forage) such as: feeding animals from pasture; increasing the ability to grow more feed; using tools including fire, mowing, grazing, and planting rangeland forages to preserve the grasslands; adjusting stocking rates to reflect available forage; preventing elk from consuming organic forage; returning pasture that has been taken out of production within the pastoral zone to ranching; and establishing a monitoring program for silage production and mowing. One commenter stated that these ranch management operations should be implemented immediately. |
| Concern ID: 51836 Page 45 | Commenters provided suggestions regarding managing ranching operations related to food storage, including requiring dairy workers to cover and monitor feed and water troughs to exclude corvids. |
| Concern ID: 51837 Page 45 | Commenters provided suggestions regarding managing ranching operations related to hazardous chemicals, including banning second-generation rat bait on ranches and minimizing the use of chemicals and pesticides. |
| Concern ID: 51838 Page 46 | Commenters provided suggestions regarding organic certifications, including implementing buffers for organic certification, assessing the value of organic certification, and actively supporting the pastoral zone to maintain organic operations |
| Concern ID: 51839 Page 46 | Commenters provided suggestions regarding managing ranching operations related to ranching fences, including removing abandoned fences, requiring wildlife-friendly fencing, and removing a pig fence. |
| Concern ID: 51840 Page 47 | Commenters provided suggestions regarding managing ranching operations related to livestock treatment, including mandating humane methods for dehorning and banning the use of veal crates. |
| Concern ID: 51841 Page 47 | Commenters provided suggestions regarding ranching operations related to public awareness and education, including: promoting public awareness via a website; enhancing visitor and rancher education; adding a demonstration museum; adding visitor experience opportunities such as B&B farm stays, roadside stands and demonstration museums; and increased collaboration with ranchers. |
| Concern ID: 51842 Page 47 | Commenters provided suggestions regarding ranching operations related to waste, including banning compost until impacts to vegetation are proven, capturing methane from manure, and using anaerobic digesters (which could utilize climate-offset funding). |
| Concern ID: 51843 Page 48 | Commenters provided suggestions regarding ranching operations related to agricultural workers, including: encouraging overtime pay, clarifying that employee housing is available on-site, clarifying that sublets for non-agricultural employees are prohibited, publishing criteria for new operators, and improving living conditions. |
| Concern ID: 51844 Page 48 | Commenters provided suggestions regarding ranching operations related to diversification, including: only allowing diversification under certain circumstances, limiting diversification income to less than 20 percent of ranching/dairy income, clarifying that raising non-traditional livestock is diversification, never allowing on-site slaughtering; prohibiting row crops, and encouraging diversification. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|---|--|
| Concern ID: 51845 Page 49 | Commenters provided suggestions regarding ranching operations related to BMPs and implementing adaptive management. Suggestions relating to BMPs included: encouraging and incentivizing BMPs, harmonizing BMPs with other federal and state practices, utilizing management-intensive grazing, and managing for carbon sequestration. One commenter also suggested that ranchers should be allowed to manage based on their knowledge of pasture, water, natural resources, and livestock operations. |
| Concern ID: 51846 Page 50 | Commenters suggested the park should further regulate mowing and blading of brush-lands. Other commenters suggested that there should be more control of invasive plants. |
| Concern ID: 51847 Page 51 | One commenter suggested that the park prohibit the use of ranch dogs. |
| Concern ID: 51848 Page 51 | Commenters suggested that permits for low-impact projects should not be required, that the permitting process should be quicker, and that processes for maintaining and repairing historic structures should be streamlined. |
| Concern ID: 51849 Page 52 | One commenter suggested that additional water sources should be sought. |
| Concern ID: 51850 Page 52 | One commenter suggested that the ranches inside the park should be able to perform similar practices to those ranches outside the park. |
| Concern ID: 51851 Page 52 | One commenter advocated for specific operational changes and diversification at the Lunny Ranch, including: restoration of dairy operations, enhancement of crop production, allowing for production and harvest of non-forage crops, restoration of hog and small chicken production, allowing for building of new structures, allowing for on-farm sales, and providing new housing. |
| Concern ID: 51852 Page 54 | One commenter requested for specific operational allowances for the Drakes Bay Oyster Company, including: approving the development of retail and kitchen space to all of the ranchers to sell their products, and approving the addition of BBQ pits in existing picnic areas. |
| Concern ID: 51863 Page 55 | One commenter cited efforts to eliminate predator impacts to livestock utilizing non-lethal methods. Suggestions for managing predators included the use of guardian animals, fencing, and sound and/or lighting devices. |
| Concern ID: 52152 Page 55 | Commenters provided suggestions regarding managing ranching operations related to ranching infrastructure, including: repairing ranch roads to minimize sedimentation, invasive species, and fecal deliveries; allowing ranchers to mine gravel; repairing ranch infrastructure; clarifying that capital improvements must be done by SUP milestones; using sustainable power in new buildings; and staging emergency equipment at ranches to better prepare for emergencies. |
| AL200 - Alternatives: Elk Management | |
| Concern ID: 51853 Page 57 | Several commenters stated they would like the elk to be allowed to stay in their historic range and to be protected within the park. Further, ranchers should coexist with the elk in the pastoral zone, and the management of a healthy tule elk population should be the priority. Commenters in support of the tule elk population also expressed support for the continued restoration and expansion of a free-ranging tule elk population within the park and within the pastoral zone. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|------------------------------|--|
| Concern ID: 51854 Page 59 | Several commenters suggested the use of immunocontraception as the appropriate tool for the management of the tule elk population within the park because it is cost-effective and has been used in the past, including at the park and at other locations. One commenter also pointed out that lethal controls may result in increased reproduction rates. |
| Concern ID: 51855 Page 61 | <p>Commenters provided a variety of reasons as to why conflicts between the elk and ranching activities need to be managed, including: challenges in meeting organic certification requirements, decreased availability of natural resources, interaction issues between cattle and elk, transmission of disease, damage to ranch infrastructure, competition for forage, compounding impacts due to drought conditions (which justifies immediate action), and impacts to cultural resources. Commenters would like assessments of these impacts to be included in the Ranch CMP.</p> <p>Several management methods for elk were suggested, including: relocation out of the pastoral zone, management of wilderness habitat, building and/or reinforcing fencing between the pastoral zone and the wilderness, compensating ranchers for elk damage and losses of forage, sterilization, hunting and distribution of meat, euthanizing of diseased elk, use of natural controls (starvation, disease, predation, etc.), reintroduction of predators, use of supplemental water resources to lure the elk, hazing, use of lease money to employ elk wranglers, increased staff for elk management, and reduction of herd size. Commenters would like cost/benefit assessments of these actions.</p> |
| Concern ID: 51856 Page 64 | <p>Some commenters stated that fencing would allow for coexistence of cattle and elk in the pastoral zone, indicating that fences should be constructed to contain cattle while allowing free movement of elk. These commenters indicated that the Ranch CMP should include a program to help ranchers install, monitor, and maintain these fences.</p> <p>Other commenters stated that the use of fencing to separate the pastoral zone from the wilderness would not be effective because tule elk will find ways around fencing to inhabit their historic range.</p> |
| Concern ID: 51857 Page 65 | Commenters indicated that a long-term elk management approach is needed immediately and should involve implementation of the 1998 Elk Management Plan, which the park has the authority to implement, to ensure the continuation of agriculture in the park. This plan does not authorize the movement of elk beyond the designated elk range. Further, commenters noted that all necessary analysis was completed for the 1998 management plan, and management, including compensation to ranchers for damages, should begin immediately. |
| Concern ID: 51858 Page 66 | Commenters indicated that management of the tule elk is needed as a result of issues pertaining to Johne's disease. One commenter suggested that the NPS assess the presence and transmission capacity of Johne's disease in wildlife and livestock, and stated that relocation of elk is not an option within the park due to the presence of disease. Therefore, elk must be harvested or moved to sufficiently remote locations to avoid spread of disease. Another commenter requested that the plan describe the history of Johne's disease in the park, how it is tested for, and how it is managed. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|---|--|
| Concern ID: 51859 Page 67 | Several commenters advocated for lethal management such as hunting to be used as a means to control the elk population in the pastoral zone. Specific suggestions included: hunt only elk that are causing damage, conduct limited hunts with ranchers selling tags and putting profits toward infrastructure repair or habitat restoration, sell meat as a local food source, and donate meat to soup kitchens. |
| Concern ID: 51860 Page 68 | One commenter indicated that long-term hunting of elk should not be a management option because the park would be committing to management activities that may not be reflective of the elk population at a given point in time. |
| Concern ID: 51862 Page 68 | Several commenters stated that only non-lethal and humane methods should be considered in the management of the tule elk population and provided detailed justification for the importance of using ethical management methods. Methods suggested include: fencing, exclosures, hazing, reproductive controls. Commenters indicated that only non-lethal management would be socially acceptable and supported by the public. Other commenters further advocated for no harm in management, including no harassment or destruction of resources. |
| Concern ID: 51866 Page 70 | Commenters provided examples of specific wildlife management plans to provide guidance in the development of management of the tule elk population. Specific examples included: management of elephants at Kruger National Park in South Africa and management of tule elk by the California Department of Fish and Wildlife and the California National Guard. |
| Concern ID: 51867 Page 71 | Commenters would like to see tule elk herds recognized and managed as distinct herds with each managed for sustainability and balance between natural and cultural resources. One commenter suggested that the distinct herds should be managed by a third-party expert. |
| Concern ID: 51871 Page 71 | Commenters indicated that, particularly given unanticipated past events regarding the movement of the tule elk within the park, the Ranch CMP should include adaptive management measures. |
| Concern ID: 51875 Page 72 | One commenter suggested adjusting the ranch boundaries within the pastoral zone to allow elk to roam in their preferred areas. |
| Concern ID: 51877 Page 72 | One commenter expressed opposition to the use of hazing of the elk within the pastoral zone, indicating that it causes damage to ranch infrastructure and creates costs to taxpayers. |
| Concern ID: 51878 Page 72 | One commenter expressed concern about the creation of water resources within the park, stating that this action requires a public decision process. The commenter further indicated that the Ranch CMP must evaluate the benefits of habitat enhancement within the elk range and the adverse impacts that would continue to result from habitat enhancement within the pastoral zone. |
| Concern ID: 52163 Page 73 | Commenters indicated that tule elk should be managed so that they do not occur in the pastoral zone. Some commenters further stated that the tule elk should be returned to the Limantour wilderness and that their population numbers should be managed to appropriately reflect the carrying capacity of the land. |
| AL300 - Alternatives: Other/New Elements | |
| Concern ID: 51889 Page 74 | Commenters suggested several new alternatives and/or elements relating to ranching such as: showcasing ranchers' stewardship practices to the community; developing a historic ranch complex at Tomales Point; clearly defining "sustainable operational practices"; promoting agricultural tourism and ranching education; and providing incentives to decrease carbon emissions. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|---|--|
| Concern ID: 51891 Page 76 | Commenters suggested considering several new alternatives and/or elements relating to park management, park restoration, and visitor experience in the Ranch CMP, such as: creating a horse riding program for handicapped children; restoring the coastal prairie; increasing recreational opportunities, such as horseback riding, biking, and educational programs; prohibiting individual leaseholders from authorizing special events; increasing habitat for native wildlife; reintroducing extirpated species (black bears, pronghorn, and squirrels); reducing the presence of non-native vegetation; protecting and restoring streams and riparian habitat; and developing alternative energy sources in the park. |
| Concern ID: 51892 Page 78 | Commenters suggested that connectivity and accessibility should be improved within the park. Many commenters suggested specific areas where trails should be improved or developed within agricultural areas of the park. |
| Concern ID: 51898 Page 80 | One commenter provided multiple suggestions for alternative elements, including: removing impoundment dams in former tidal areas; decommissioning unused ranch roads; utilizing ground-penetrating radar to identify old dump sites (and to remediate those old dump sites); assessing the feasibility of controlled burns in wilderness areas; posting maps of designated pastures and specific areas within the pastoral zone (such as riparian areas); posting information regarding range management guidelines as well as information on SUPs, ranch milestones, and FMV; banning dogs on paths in proximity to livestock; and removing fencing in public rights-of-way. |
| CC1000 - Consultation and Coordination: General Comments | |
| Concern ID: 51909 Page 80 | <p>Commenters suggested that several other agencies, entities, and stakeholders should be consulted with during preparation of the Ranch CMP, including the United States Department of Agriculture - Natural Resources Conservation Services (NRCS), California Resources Agency, and Marin County Resources Conservation District (RCD), the Marin Humane Society, University of California Cooperative Extension (UCCE), the Point Reyes Seashore Ranchers Association, and the Marin County Agricultural Commissioner. Other stakeholders that should be consulted include agronomists, wildlife experts, environmental groups, and concerned citizens. One commenter emphasized that collaboration and partnership between the NPS and the ranchers in the park is essential to the planning process.</p> <p>One commenter suggested topics that should be discussed by these parties in informal, trust-building working groups, including diversification of crops, rangeland improvements, invasive species, succession of rights, and elk management.</p> |
| Concern ID: 51910 Page 83 | One commenter was concerned that preliminary agreements between the NPS and the ranchers have already occurred, and requested that these discussions and agreements should be communicated openly. Another commenter suggested that the planning process should be transparent. |
| Concern ID: 51911 Page 84 | One commenter suggested that public meetings should be held in San Francisco to reach a wider audience. |
| Concern ID: 51912 Page 84 | One commenter suggested that a formal public vote take place to determine whether ranching families should be allowed to stay on public lands. |
| Concern ID: 51913 Page 84 | One commenter stated that the relationship between the park and the ranchers has been historically exemplary and that they would like to see this relationship continue. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|---|--|
| Concern ID: 52182 Page 85 | Commenters suggested that the NPS should form partnerships and/or advisory groups to help gather stakeholders' opinions and ideas. |
| Concern ID: 52184 Page 87 | One commenter made several suggestions regarding information that should be included in the Ranch CMP, including: define the current and desired conditions for all lands within the pastoral zone while offering strategies to meet desired conditions; include maps of soils, vegetative communities, wildlife habitats, water resources, and livestock use areas; include a map and tabulation of range development; and provide a background of grazing documenting the amount of public money that was used for the buyout and explaining the terms and conditions. |
| IS1000 - Issues: Environmental Baseline Conditions | |
| Concern ID: 51782 Page 88 | Commenters stated that the baseline for consideration of environmental impacts under the Ranch CMP should include current lease requirements and should not include the occurrence of tule elk in the pastoral zone. Commenters also questioned how the baseline would address the removal and forage consumption of exotic deer. |
| Concern ID: 51831 Page 89 | Commenters stated that, because ranching and farming activities have occurred in the area for 150 years, these activities represent the baseline condition for the Ranch CMP. One commenter suggested that the Ranch CMP fully describe the need for the NEPA process at this time to continue current ranching operations that have occurred for a 150-year timeframe while there was not a requirement for NEPA for past changes of land use in the park. |
| Concern ID: 52174 Page 90 | Commenters presented several elements that need to be assessed and explained pertaining to the tule elk in the park, including: assess the presence and transmission capacity of Brucellosis in wildlife and livestock, provide data on the weight of elk, determine the amount of forage consumed by elk and livestock, determine the amount of other feed eaten by elk, address the claim of the occurrence of elk stabbing livestock with antlers, explore the possibility that the elk population is self-regulating and not in need of management, explore the claim that elk will starve if moved from the pastoral zone, address the claim that the park moved the elk into the pastoral zone, assess the impacts from extensive fencing, assess the success of using water to lure elk from cattle areas, and assess the success of fencing around ponds to exclude elk. One commenter would like the park to provide specific information pertaining to the tule elk, including: the location of impacts; a description of impacts to ranching operations; a description of the nature and extent of impacts to pastures; a description of how water is provided to cattle, how the elk are accessing this water, and how much of this water is being consumed; and a description of what hazing methods are being used and their efficacy. |
| Concern ID: 52225 Page 91 | One commenter requested further information on cattle grazing, including cattle numbers and amounts of vegetation consumed during different times of the year. They further requested current grazing information to be presented with an inventory of fences, corrals, water developments, use of supplements movement of cattle and more information on the relationship between grazing on various land allotments, how much area is covered in cattle pats, and disclosure of the total effluent discharges. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future) | |
|--|---|
| Concern ID: 51870 Page 92 | Commenters noted that ranchers have been a part of the landscape for generations and that maintaining agriculture in the park is important to agriculture both locally and nationally. Because farmers and ranchers in West Marin County are pioneers in sustainable and organic practices, agriculture in this area is critical to the future of the national food supply. Additionally, maintaining agriculture in the park is important to maintaining the support services, marketing opportunities, and economic sustainability for agriculture locally. |
| Concern ID: 51832 Page 94 | Commenters expressed concern over current ranching conditions including cruelty to animals, use of antibiotics, impacts to wildlife and wildlife habitat, impacts to water quality, impacts to soils, impacts to air quality, and contributions to climate change. Commenters also expressed concern for preference for a non-native species, cattle, over native species. |
| Concern ID: 51834 Page 95 | One commenter expressed concern over the impacts to ranch operations related to climate change and the predicted variability in rainfall. Another commenter noted that drought conditions have already caused impacts to ranch operations resulting in the need to purchase additional feed. |
| Concern ID: 51873 Page 95 | One commenter noted that mowing and windrowing of grasses is critical for controlling weeds and improving pasture quality thereby reducing reliance on imported feeds. |
| Concern ID: 52219 Page 96 | Commenters provided information regarding the history and background of ranching and agriculture in the area indicating that these practices provide economic, employment, and educational benefits. Broader benefits that were noted included the contribution to preservation of regional agriculture and economies. |
| Concern ID: 52221 Page 97 | One commenter expressed concern over future actions threaten the continuation of agriculture in the park and therefore threaten the larger county. They suggested that the NPS should assess the cumulative impact of park-based agriculture on the viability of agriculture county-wide. |
| Concern ID: 52223 Page 97 | One commenter expressed concern over future actions threaten the continuation of agriculture in the park and therefore threaten the larger county. They suggested that the NPS should assess the cumulative impact of park-based agriculture on the viability of agriculture county-wide. |
| IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future) | |
| Concern ID: 51881 Page 97 | One commenter indicated that, due to the short-term nature of SUPs, it is economically unfeasible for ranchers to undertake costly, long-term management actions on their property. Another commenter stated that, due to existing permit language, ranching operations are not properly appraised because they often do not take into account capital improvements. |
| Concern ID: 51876 Page 98 | Many commenters stated that ranchers have already been paid for their land, their leases have expired, and they are currently paying artificially low lease prices that are being subsidized by the taxpayers. Commenters further noted that these lands do not belong to the ranchers, but rather belong to the public, are open to the public and wildlife, and that subsidies are no longer justified. |

| Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement | |
|---|--|
| Concern ID: 51880 Page 99 | One commenter stated that the 20-year lease terms do not take into account economic uncertainties and that these ranches in the park may not be economically feasible in the future. Another commenter stated that short-term permits create uncertainty and make ranch improvements difficult. This combined with any decrease in grazing acreage or competition for forage by elk threatens the organic production and the economic stability of the ranches. |
| IS1200 - Issues: Cultural Resource Management (past, present, and future) | |
| Concern ID: 51882 Page 100 | Commenters noted that the 1980 GMP allows for agricultural practices to occur in the park. They also noted that the Point Reyes Ranches and the Olema Valley Ranches have been found to be eligible for nomination to the National Register of Historic Places as Historic Districts, and that the park should recognize the pastoral areas of the park as "continuing cultural landscapes." Ranches are also eligible for designation as United Nations Educational, Scientific, and Cultural Organization (UNESCO) World Heritage Sites. |
| Concern ID: 51883 Page 101 | Commenters suggested that the Ranch CMP consider removal of tule elk from the pastoral zone and develop a plan for managing the ranches to ensure the long-term viability of agriculture in these Historic Districts. Management should include: fencing elk out of the Historic Ranching Districts; managing ranches as defined by UNESCO World Heritage Sites; and creating a contract with a nonprofit corporation for services similar to those provided by the Cuyahoga Valley National Park's nonprofit partner. |
| Concern ID: 51884 Page 103 | One commenter suggested that preservation of the diverse cultural landscape at Point Reyes National Seashore should be given importance equal to preservation of historic structures located at the park. |
| Concern ID: 51885 Page 103 | Commenters stated that, without the full support by the NPS regarding requests made by the ranchers within the park, the NPS is contributing to the loss of a cultural resource. |
| Concern ID: 51886 Page 103 | One commenter asked for prioritization for the preservation of native American cultural sites. |
| Concern ID: 52193 Page 104 | One commenter suggested that ranchers would provide environmental improvements beyond those required in the leases should be reimbursed through credits on the leases. |
| IS1300 - Issues: Natural Resource Management (past, present, and future) | |
| Concern ID: 51890 Page 104 | Commenters stated that the Ranch CMP should consider the value of grazing to preserve and restore native grasslands in the park and in Golden Gate National Recreation Area and to reopen lands previously taken out of agriculture to ranching operations for lease/permit. |
| Concern ID: 51887 Page 105 | Commenters stated that the natural resources present in the park should be protected and preserved. |
| Concern ID: 51888 Page 105 | Commenters indicated that natural resources management cannot be applied within the cultural landscape in the same way that this management is applied elsewhere in the park and suggested that the Ranch CMP include a discussion of how natural resources management will be dealt with on agricultural lands. |
| IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future) | |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|---|--|
| Concern ID: 51893 Page 105 | Several commenters stated that ranchers do not have the right to impact the elk and provided reasons for elk to remain in the area, including: they are the native grazers and belong in the area, they serve an important role to the ecosystem, they represent an important species to conservation history, the land belongs to the public and to the wildlife, and the elk resided in this area long before people. These commenters also expressed concern that ranching activities are impacting the elk and that threats exist to their health if they are not properly managed. |
| Concern ID: 51894 Page 107 | One commenter discussed the status of the tule elk as an "umbrella" species that represents long-term restoration efforts in California that should be given priority over cattle grazing. The same commenter described the reintroduction of the elk to Tomales Point as a historical note to the restoration of the species and to the future of restoration ecology in general. |
| Concern ID: 51896 Page 108 | Several commenters stated that elk are threatening ranchers' ability to raise quality food and meet consumer demand with impacts that include: damage to fences, damage to water sources, damage to irrigation lines, spread of disease, impacts to grazing and native pastures, impacts to organic forage and certifications, and threats to the economic survival of ranches due to costs incurred from elk impacts. |
| Concern ID: 51897 Page 108 | One commenter stated that claims of calf goring by elk are unsubstantiated. |
| Concern ID: 51899 Page 108 | Commenters stated that the exponential growth of the elk population in the absence of hunting and predation, which historically kept the population under control, is a problem that is likely to destroy natural habitat. |
| Concern ID: 51900 Page 109 | One commenter questioned background information provided in scoping materials, indicating that ranchers and the public had raised concerns related to tule elk and their impacts on ranch operations. |
| Concern ID: 51901 Page 109 | One commenter noted that, prior to 2002, the NPS managed elk following the 1998 Elk Management Plan to avoid harm to other permitted uses, but in 2002, this management ceased. |
| Concern ID: 51902 Page 110 | One commenter stated that a map being used in the current Ranch CMP materials is misleading because it does not include the designated elk range. |
| Concern ID: 51903 Page 110 | One commenter noted that there is no research indicating that elk are eating grass needed by cattle, and there is therefore no valid claim by the ranchers that they are being put out of business by elk grazing in the area. |
| IT1000 - Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries) | |
| Concern ID: 51906 Page 111 | <p>Commenters noted that the Ranch CMP should address the impacts of ranching operations including changes to soil compaction and structure, soil erosion, soil biology, increased nitrogen deposition, surface and subsurface water quality, contribution to GHG emissions, waste disposal, and an increase in invasive species.</p> <p>Commenters stated that BMPs should be evaluated for soil management, topsoil preservation, and prevention of erosion. One commenter noted that previous efforts to protect from these impacts involved annual measurements of residual dry matter. One commenter stated that the Ranch CMP should describe the current conditions of water quality and quantity in the project area and evaluate consistency with the Organic Act providing "maximum protection, restoration, and preservation" to natural resources, and consider various published sources of information including a paper discussing off-stream water sources and erosion for cattle.</p> |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| IT1100 - Impact Topic: Water Quality and Quantity | |
|---|--|
| Concern ID: 51907 Page 112 | <p>Commenters stated that the Ranch CMP should assess and describe direct, indirect, and cumulative impacts of ranching operations to water resources resulting from point source and non-point source runoff of contaminants into Tomales Bay, Drakes Estero, tributaries, stock ponds, and other surface waters throughout the area, noting that nitrates and microbial pathogens (such as fecal coliform bacteria) are of particular concern.</p> <p>The Ranch CMP should set water quality standards and develop an ongoing monitoring plan to provide data for adaptive management of BMPs. This plan should include: setting goals for contaminant loading from cattle operations; assessing ways to control both point source and non-point source impacts; explaining how "top priority" tributaries are determined; explaining how water quality is assessed; and developing a cumulative watershed effects analysis that includes an explanations of past survey efforts.</p> |
| IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas | |
| Concern ID: 51916 Page 114 | <p>Commenters stated that ranchers at the park have in the past and are currently using measures to reduce impacts to floodplains, wetlands, and riparian areas, including: using buffers for water quality protection and sensitive riparian areas; enhancing habitat in sensitive riparian and wetland areas; and committing under the existing status quo to continue their partnerships with agencies and organizations to reduce negative environmental impacts.</p> |
| Concern ID: 51914 Page 115 | <p>Commenters stated that past, present, and future direct and indirect impacts to riparian areas, aquatic features, and developed waters (such as increased sediments, increased levels of fecal coliform bacteria, changes to hydrology, breakdown of streambanks, disturbance of streambeds, degradation of riparian vegetation, changes to nutrient cycling, and thermal effects) should be analyzed, including creating maps of the resources and documenting the current condition of the water resources. Mitigation to stabilize and restore streambanks, to monitor water quality against performance standards, and to restore riparian areas, including the establishment of buffer areas, should be developed. Impacts from water supply development should be assessed. A mitigation, restoration, and monitoring plan and timeline to achieve water quality standards should be presented. Commenters noted that cattle should be prohibited from entering water resources, and runoff from ranch operations should be eliminated.</p> |
| IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed) | |
| Concern ID: 51919 Page 117 | <p>One commenter stated that livestock grazing has been shown to be compatible with, or to enhance, the habitat for a significant number of special-status grassland species on park lands.</p> |
| Concern ID: 51917 Page 117 | <p>Commenters provided a list of species they felt should be considered in the development of the Ranch CMP and requested that the plan include: a discussion of the endangered and threatened animals and plants that exist in the grazing areas; the threats to them in those areas from cattle and other causes; an assessment of potential direct, indirect, and cumulative impacts from the implementation of the Ranch CMP to the species; and how the Ranch CMP will remediate impairment. They also requested that critical habitat be designated within the pastoral zone and that these areas be removed from the pastoral zone. One commenter stated that the Ranch CMP should provide maximum protection to federal and state listed wildlife and plant species and their habitats.</p> |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|---|---|
| Concern ID: 51920 Page 123 | Commenters stated that the scope of the Ranch CMP should only evaluate new impacts, and changes from the status quo, of ranching operations to species of special concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). They further stated that ranching is part of the baseline, and as such, should not be evaluated in this Ranch CMP. |
| IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk) | |
| Concern ID: 51921 Page 123 | Commenters stated that the Ranch CMP should describe and assess the impacts of ranching operations to fish and wildlife and associated habitat, including: impacts to breeding birds resulting from mowing and subsequent predation and impacts to wildlife species (and the public) resulting from the use of electric fencing. Further, commenters requested that the Ranch CMP describe the habitat that ranchers provide and the species that utilize these habitats, as well as the habitat needs of wildlife species within the park. Commenters also requested that the Ranch CMP broaden the scope to include analyses of all native species within the park (other than the tule elk). |
| Concern ID: 51922 Page 124 | Commenters indicated that the Ranch CMP appears to be focusing on an approach that neglects federal and state listed species and their habitats, stating that the NPS should focus on preservation and restoration of listed and native species (including the pronghorn) and that any commercial operation that is not compatible with this focus should be removed. |
| IT1500 - Impact Topic: Tule Elk (not relating to management) | |
| Concern ID: 51924 Page 125 | One commenter asked for an explanation of the impacts on elk as a result of ranch operations. |
| Concern ID: 51925 Page 125 | One commenter requested an explanation of elk habitat needs, feeding habits, and where they overlap with cattle. |
| Concern ID: 51926 Page 125 | Several commenters provided details about the history of elk in the area over the past 10,000 years and the change in population numbers. One commenter requested additional information on their history including specific numbers and ecosystem services that they provide. |
| Concern ID: 52167 Page 126 | One commenter presented several specific questions pertaining to the management of the elk population, including the following requests: provide information on possible model management plans, describe the role of state agencies (such as the California Department of Fish and Wildlife) in management of the park elk population, provide information on what a healthy elk population looks like in the Limantour wilderness (including optimal herd size in varying climatic conditions and measures to maintain a self-sustaining herd without predators), provide information on all of the potential management tools to maintain an optimal herd size (such as culling, fertility control, moving elk, fencing, and periodic burns), provide a discussion on potential fencing methods to keep elk out of the pastoral zone, provide a discussion on methods to prevent the transmission of disease to cattle, and provide a discussion of BMPs needed to sustain the optimal herd. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species) | |
|---|--|
| Concern ID: 51929 Page 127 | Commenters would like the Ranch CMP to analyze the benefits of using ranch operations such as grazing, tilling, mowing, mechanical harvesting, fencing, and other agricultural practices on the control and management of non-native invasive plants within the park. One commenter also requested that the Ranch CMP study the benefits of utilizing herbicides, indicating that the use of some herbicides may be necessary. |
| Concern ID: 51927 Page 127 | Commenters stated that the Ranch CMP should evaluate and describe the past and present extent of exotic and invasive plant species in the project area and the impacts of exotic and invasive plant species to native coastal prairie at the park. The influence of cattle grazing on the presence, spread, and potential control of exotic and invasive plant species should also be analyzed. Information on the past extent of these species was provided. Commenters also indicated that the Ranch CMP should analyze the effects of alternatives on invasive species actions. |
| Concern ID: 51930 Page 129 | <p>Commenters expressed concern over the brush encroachment that has resulted from changes in management practices (such as cessation of grazing and mowing in an area that is no longer under a lease/permit agreement) and indicated that impacts may include: changing fire regimes and creating increased fire threats; altering water availability; causing changes to vegetation structure; creating access issues for visitors; and changing the cultural landscape.</p> <p>Commenters requested that the Ranch CMP evaluate the history of brush management in the park and consider the benefits (including water quality benefits and reduction in fire danger) of allowing ranchers to control invasive brush in their pasture lands.</p> |
| Concern ID: 51932 Page 130 | Commenters stated that the Ranch CMP should consider restoration of native plant communities including coastal prairie. Restoration measures considered should include providing additional lands for restoration, such as lands around Drakes Head. |
| Concern ID: 51934 Page 131 | Commenters stated that the Ranch CMP should assess both the impacts and benefits of ranching operations on habitats and vegetation, including dunes and non-native plant species. Benefits expressed by commenters included: maintenance of complex vegetation, the use of ranching operations as a tool for the conservation, and restoration of native species. Some impacts described by commenters included: alteration of dominant vegetation species, alteration of the fire regime, increased spread of exotic species, and compaction of soils leading to decreased infiltration and water availability. |
| Concern ID: 51935 Page 132 | Commenters stated that the Ranch CMP should consider the use of fire as a management tool for invasive species management, brush management, and native vegetation restoration both in ranchlands and wilderness, and should assess the benefits of fire management to the human environment. |
| Concern ID: 51936 Page 133 | Commenters stated that the Ranch CMP should address the impacts of dune management to plant and animal species and ranching operations, including the removal of non-native vegetation from dunes, the impacts on organic certification resulting from using herbicides on non-native grasses, and how blowing sand from the dunes impacts pastureland. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|--|---|
| Concern ID: 51937 Page 133 | Commenters explained that plant species once found in the coastal prairie have been largely replaced by non-native species over the past 150 years of land use and stated that the Ranch CMP should evaluate the impacts that vegetation restoration would have on ranching operations. |
| IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change | |
| Concern ID: 51942 Page 134 | Commenters stated that the Ranch CMP should assess impacts of climate change on ranching operations in the area, including impacts from: changes in weather patterns, extreme weather events, and sea level rise. |
| Concern ID: 51941 Page 135 | Commenters stated that ranching operations contribute to air pollution, greenhouse gas emissions, and climate change and that the Ranch CMP should describe mitigation measures to address these impacts. Further, the Ranch CMP should discuss compliance with the Clean Air Act and regional Air Quality Management District guidelines, citing ammonia and noxious gas production as air quality concerns. |
| IT1900 - Impact Topic: Visual/Aesthetic Resources | |
| Concern ID: 51943 Page 136 | Commenters stated that the Ranch CMP should describe impacts of ranching operations on visual/aesthetic resources including muddy areas and the smell of ranching operations. |
| IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures | |
| Concern ID: 51945 Page 136 | Commenters stated that the Ranch CMP should assess the ranching operations and their associated activities as a cultural resource including historic ranching districts, cultural landscapes, historic vernacular landscapes, and ranching families. Some commenters noted that the ranches have designed cultural landscapes that must be retained and that the change in these landscapes should be considered features of these landscapes. |
| Concern ID: 51944 Page 138 | <p>Commenters stated that the Ranch CMP should describe cultural resources within the pastoral zone and provide a review of existing inventories while analyzing the effects to these resources. Commenters noted that physical, chemical, and erosional impacts to archeological and cultural sites are of particular concern.</p> <p>Commenters noted that the Ranch CMP should describe management and monitoring protocols to protect these resources, specifically mentioning the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.</p> |
| IT2200 - Impact Topic: Socioeconomic Resources | |
| Concern ID: 51953 Page 139 | Commenters noted the importance of historic ranches to local communities stating that they are essential to sustaining local economies through direct job creation and indirect job creation (via support industries such as distributors, veterinarians, etc.) and that they are important contributors to sustainable food production. |
| Concern ID: 51950 Page 140 | Commenters stated that the Ranch CMP should consider how additional or new requirements (monitoring, reporting, etc.) would impact the economic viability of ranch operations in the park, and also consider the reuse of some ranches that have gone out of operation. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|---|---|
| Concern ID: 51951 Page 140 | One commenter stated that economic impacts to nearby communities resulting from ranching activities at the park should be assessed in the Ranch CMP. |
| Concern ID: 51952 Page 140 | One commenter indicated that agriculture activities within the park represent a small contribution to the overall agricultural value of the surrounding counties and that removal of operations within the park would have little impact on agricultural revenue in the area. |
| IT2300 - Impact Topic: Visitor Use, Experience, and Recreation | |
| Concern ID: 51958 Page 141 | One commenter stated that the Ranch CMP should evaluate the benefit to the visitor experience of having a public interpretive center and educational programs within the ranching community that celebrates the working landscape. |
| Concern ID: 51954 Page 141 | Commenters stated that ranching operations result in impacts, both adverse and beneficial, to visitor use, experience, and recreation. Benefits include experiencing the landscape, the wildlife, and the ranching community as a valuable historic resource. Concerns with ranching operations at the park included access restrictions on ranches, impacts and access to trails and other park resources, visual intrusions, the smell of ranch operations, and inconsistency with expectations of wilderness. The Ranch CMP should consider strategies that would improve the condition of public trails in the pastoral zone and address current degraded trail conditions while offsetting losses to ranchers. |
| Concern ID: 51959 Page 143 | One commenter stated that ranchers are willing to cooperate with the park in preserving existing public access through the ranch lands, but that any additional access could result in infrastructure challenges and changes in livestock behavior that could threaten the visitor experience and pose safety concerns for the visiting public. |
| Concern ID: 52159 Page 143 | Commenters stated that opportunities exist at the oyster farm to take tours and purchase products and at B Ranch to participate in farm stays and that offering these opportunities more broadly within the park would enhance the visitor experience and produce income for the ranchers. |
| Concern ID: 52169 Page 144 | One commenter cited the significance of the tule elk to visitor experience within the park and indicated that public attitudes should be assessed in the development of the Ranch CMP. |
| IT2400 - Impact Topic: Health and Safety | |
| Concern ID: 51960 Page 145 | Commenters suggested that the impact topic for health and safety related to operator and worker housing should be dismissed due to existing standards and inspection protocols in place and adherence to corrective measures required. |
| IT2500 - Impact Topic: Wilderness | |
| Concern ID: 51963 Page 145 | One commenter stated that the Wilderness Act allows for certain domestic livestock grazing operations to continue in areas that were established prior to designation of those areas as wilderness as long as operations are consistent with the preservation of the wilderness character. The commenter noted that grazing in wilderness has been set aside by court rulings in the past where agencies have failed to address impacts to wilderness conditions. |
| Concern ID: 51961 Page 146 | Commenters suggested that the park should not be considered wilderness due to previous road and housing within the park. |
| Concern ID: 51964 Page 146 | One commenter stated that designated wilderness should not be manipulated as a part of management actions and that no structures should be authorized that would diminish management of this area as wilderness. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| IT2600 - Impact Topic: Park Operations | |
|---|--|
| Concern ID: 51965 Page 147 | Commenters stated that the Ranch CMP should describe current and future park operations related to ranching operations, including regulatory oversight as well as supervision and management of tule elk population on ranchlands. Commenters also questioned how much management of the tule elk population would be needed (monitoring, fencing, etc.) in the absence of agricultural activities, and suggested the Ranch CMP should describe the cost incurred by the NPS to perform oversight and supervision of ranching operations and management of tule elk on ranchlands and in the pastoral zone. The Ranch CMP should also disclose what chemicals are used in the pastoral zone. |
| IT2700 - Other/New Impact Topics | |
| Concern ID: 51967 Page 149 | Commenters noted that not all lands in the pastoral zone are capable of sustaining livestock and stated that the park must determine the current carrying capacity of these lands for grazing. One commenter noted that, without this evaluation, and the decision that non-native cattle belong here, the park cannot make an appropriate assessment as to whether grazing is an appropriate land use in this area. |
| Concern ID: 52171 Page 150 | One commenter expressed concern over the possibility of elk leaving the park, which would result in added pressure on the state fish and wildlife agency. The commenter indicated that the Ranch CMP should plan for this potential outcome. Additionally, this commenter would like data shared pertaining to the movement of the elk herds. |
| ON1000 - Other NEPA Issues: General Comments | |
| Concern ID: 51968 Page 150 | Commenters suggested that a full Environmental Impact Statement should be completed. One commenter noted that the public scoping newsletter gave the impression that the NPS has predetermined its course of action. |
| Concern ID: 51969 Page 151 | One commenter suggested that the NPS should improve its method for accepting public comments, particularly the NPS should allow comments that are emailed, and that the PEPC webpage should be able to accept formatted comments and attachments. |
| Concern ID: 51970 Page 151 | One commenter suggested, per NEPA regulations, that the management of Tule elk and all livestock grazing-related infrastructure must be considered in the scope of this Ranch CMP. |
| Concern ID: 51971 Page 152 | One commenter suggested that the proposed project does not require the NPS to proceed with an EA to comply with NEPA to modify the duration of the leases, because NPS NEPA regulations include a categorical exclusion from further NEPA review for renewals of permits that do not entail new construction or any potential for new environmental impact. |
| Concern ID: 52233 Page 153 | Commenters state that the 1998 Elk Management Plan provides the needed guidance to address the current presence of elk in the pastoral zone, that a new NEPA analysis is unnecessary to address the issue, and that the NPS should apply the alternative adopted in the 1998 Elk Management Plan |
| PN1000 - Purpose and Need: Planning Process and Policy | |
| Concern ID: 51973 Page 153 | Commenters suggested that the NPS works too slowly and should shorten the review process for the Ranch CMP and the publication of the decision document. |
| Concern ID: 51974 Page 154 | One commenter suggested that the Point Reyes Seashore Ranchers association is not a legal entity, and that this Association has been given too much power in decision-making processes. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| | |
|---|---|
| Concern ID: 51975 Page 154 | One commenter suggested that hunting, cropping, culling, internal elk-proof fencing, forced removal/relocation of Tule elk within the park, and the conversion of grazing lands into cultivation-agriculture are in conflict with NEPA and NPS regulations. |
| PN2000 - Purpose and Need: Park Purpose and Significance | |
| Concern ID: 51977 Page 155 | One commenter suggested that the park was established to include the agricultural/pastoral region of the park, and that long-term lease agreements should be established and upheld. They suggested that allowing long term rolling 20 year leases is necessary to maintain long term farming operations, as well as commitments from farm supply business, lenders, and other community support organizations. |
| Concern ID: 51830 Page 155 | One commenter stated that the enabling legislation for the park did not identify the existing pastoral zone or permanent commercial cattle operations. The pastoral zone, allowing for specific regulated commercial operations, was incorporated in the 1998 Management Plan and did not exclude native wildlife from occurring in this area. |
| Concern ID: 51976 Page 156 | Commenters suggested that the park is for wildlife, not for ranchers. Commenters also stated that agricultural uses should only be allowed if they are deemed appropriate and do not impair park resources. One commenter stated that agricultural leases held by individuals who have no direct bloodline to the original owners should be terminated immediately. |
| Concern ID: 51978 Page 157 | One commenter suggested that the park should be referred to as a National Seashore in all publications and communications with the public. |
| PN8000 - Purpose and Need: Objectives In Taking Action | |
| Concern ID: 51979 Page 158 | <p>Commenters suggested that the Ranch CMP should educate the public about the compatibility of farming and nature by highlighting farm sustainability, marketing, and local production and consumption of the regional agricultural products. Other commenters suggested that an objective of the Ranch CMP should be to ensure that the ranches continue to be economically viable, and to mitigate adverse impacts from Tule elk on ranches.</p> <p>Other specific objectives suggested by commenters included: favoring native annual wildflowers and perennial grasses, developing unique gastronomic resources, encouraging sustainable agricultural practices, providing a framework for cooperation between hikers and ranchers, and allowing current practices to continue while allowing for diversification.</p> |
| Concern ID: 51980 Page 159 | Commenters suggested that the Ranch CMP objectives lack specificity, stating specific information that needs clarification, including: additional details regarding any anticipated actions of the Ranch CMP. |
| Concern ID: 51981 Page 159 | Commenters suggested that the Ranch CMP include additional objectives, including: to assess whether confined animal facilities and other rangeland operations are operating in compliance with current federal and state regulations; to address carbon sequestration; to discontinue European cattle operations in the park; to protect Tule elk; to clarify NPS expectations and rancher commitments; and to restore agricultural activities in the Olema Valley and Point Reyes Historic Ranch Districts where they historically existed. |
| Concern ID: 51982 Page 161 | One commenter stated that materials prepared to educate the public on the Ranch CMP prior to commenting were misleading in that they imply that the park already has a plan objective to keep the elk in the pastoral zone. |

Table 1: Code, Corresponding Concern ID, and Corresponding Concern Statement

| PO1000 - Park Operations: Guiding Policies, Regs and Laws | |
|--|---|
| Concern ID: 51984 Page 161 | One commenter requested that the park make available the original transfer documents for grazing properties in the park. Another commenter suggested reevaluating the grazing leases according to statutes 459-459/C7. |
| RF1000 - References: Suggested References | |
| Concern ID: 51985 Page 161 | Additional references regarding wildlife-friendly fencing, stewardship and engagement, the management of historic properties, sustainable agriculture, and diversification should be reviewed and considered during the preparation of the Ranch CMP. |

[This page intentionally left blank.]

PUBLIC SCOPING COMMENT SUMMARY

The following report is organized by codes and then concern statements. Representative quotes are provided for each concern statement.

Representative quotes are taken directly from PEPC exactly as it was entered from text provided by the commenters. Grammar and spelling have not been changed. These representative quotes are not the only comments received under a particular concern statement; rather, these quotes have been chosen to represent those comments categorized under each concern statement.

AL100 - Alternatives: Agriculture and Agricultural Leases

Concern ID: 51732

CONCERN STATEMENT: One commenter would like the Ranch CMP to consider an alternative lease term that supports the adoption of farming practices that are considered ecologically sustainable and provide financial and/or other incentives to ranchers for BMPs that provide environmental benefits.

Representative

Quote(s):

Corr. ID: 2960

Organization: Marin Conservation League

Representative Quote: Consider lease terms that support lessees in the continued adoption of farming practices considered to be ecologically sustainable, including organic and carbon-beneficial practices. In order to encourage a sustainable combination of agricultural land uses, allow a diversity of food and fiber crops, as appropriate in existing soils and water regimes. Provide financial and/or other incentives to ranchers for "best management practices" that provide particular environmental benefits, such as intensive grazing to restore native grasses or application of compost for carbon sequestration.

Concern ID: 51726

CONCERN STATEMENT: Commenters stated that the Ranch CMP should consider an alternative that discontinues and phases out ranching and all lease/permits on the park. Alternative lease terms were suggested that included a phase out after 10 years and conditions on leases that would phase them out unless they can demonstrate that a specific individual lease/permit is an essential and positive addition to the natural resources of the park. Other suggestions included a competitive bid lease/permit process and buyouts to willing groups for the purpose of returning the lands to their former wildlife status.

Representative

Quote(s):

Corr. ID: 867

Organization: Center for Biological Diversity

Representative Quote: If the CRMP is going to extend commercial lease/permits for up to 20 years, then there should be conditions on these commercial operations to ensure they are compatible with the mission of the park. In no way should the CRMP make lease/permits within PRNS permanent. Lease/permits should automatically terminate upon their expiration, unless the NPS can demonstrate that a specific individual lease/permit is an essential and positive addition to the natural resources of PRNS.

Corr. ID: 938

Representative Quote: 3b. Buy-outs of leases/permits from willing leasees and permittees: If any lease/permit holders wants to voluntarily be bought-out of their lease/permit, they should be facilitated in this request by the NPS. National and state wildlife conservation non-governmental organizations are also willing to help negotiate and help fund buy-outs of PRNS leases/permits from willing sellers.

Corr. ID: 1015

Organization: Tule Elk foundation

Representative Quote: Tule Elk, including all native wildlife, should be the #1 consideration and long-term vision for the NPS. The pastoral lands for dairy cattle/grazing operations that have been given special leases over the last nearly 50 years by the NPS should not take priority over native habitat and species within a National Park and specifically within the Pt Reyes National Seashore. The NPS should develop a phase out plan for dairy/grazing operations possibly in a maximum of 10 year lease agreements. It appears some of the ranches including the buildings/facilities are in poor condition with heavy grazing and very degraded lands on their leased land. Numerous cattle trails in the pastoral lands are creating erosion challenges throughout the park pastoral lands. There are little, if any, native forbs or shrubs in the heavily grazed lands. From our understanding, the original pastoral lands owners were given fair market value (according to original statutes) for their lands and then allowed to continue to graze the lands under special agreements/leases with the federal government.

Corr. ID: 1032

Representative Quote: A comprehensive ranch management plan should include allowing groups like the Nature Conservancy to buy the leases from willing sellers for the purpose of returning these lands to its former wild status. Additionally, businesses should be allowed to be bought out only for the same purpose.

Which are:

- * Restoration of the coastal prairie native grasses.
- * Gradual removal of beef cattle from prairie lands to be restored.
- * All ranch lands that have been abandoned should be returned to wild lands and included in the Phillip Burton Wilderness or else a newly created California Coastal Prairie Wilderness.

Corr. ID: 1038

Organization: the Wildlife Trust

Representative Quote: Short term leases/permits revert to the NPS: At the expiration of the each current short-term lease/permit, the land should revert to the NPS and these former commercial grazing lands should be restored to native coastal prairie and costal scrub for the use of native wildlife, scientific study and passive recreation by the general public.

Corr. ID: 3038

Representative Quote: Consider a phasing out period for family operated ranches to a competitive bid system open to all, which would avoid entitlement issues while still maintaining the historic agricultural landscape.

Corr. ID: 3064

Organization: In Defense of Animals

Representative Quote: General exceptions can be made when the NPS can demonstrate that a specific lease permit constitutes an essential and positive (enhancing) contribution to the natural resources of PRNS. This plan should also provide for an option where current lease permit holders voluntarily be bought out. To this end, the help of wildlife preservation organizations should be solicited to facilitate buy-outs from willing sellers. In addition, those lease permit holders interested in the future of the PRNS could be approached with an option of investing in turning an existing ranch building into a full-service hacienda-style lodge for visitors.

Concern ID:

51727

**CONCERN
STATEMENT:**

Commenters stated that the Ranch CMP should consider an alternative to restore lands taken out of agriculture back to agricultural use and offer long-term, self-renewing or "rolling" lease/permits to ranchers with consistent standards for practices that allow diversity of agricultural activities.

**Representative
Quote(s):**

Corr. ID: 2579

Representative Quote: A high priority for the future is the restoration to active agricultural operation of the ranches whose leases have been terminated. Ranch leases should be long term, 20-year leases and be self renewing, in order to allow continuity of the ranches into the future. All dairy ranches should be offered uniform standards of permitted practices that allow for diversity of agricultural activities on the ranches, to promote their economic viability.

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: Review of permit structure

i) Historically and currently, PRNS has issued SUPs to ranch operators for terms from five to twenty years. The November, 2012 memorandum from the Secretary of the Interior directed the NPS to consider offering 20 year leases/permits to all ranchers. As PRNS has already offered 20 year agreements to some ranchers without a formal NEPA process, PRSRA believes PRNS could similarly offer 20 year leases/permits to all ranchers without initiating the current EA. However, because PRNS included the review of permit structure as an issue to cover in this EA, PRSRA will provide some guidance for the process. This EA should fully evaluate the concept of a 20 year rolling renewal agreement. In this type of agreement, at the end of each year the lease is automatically renewed for the length of the initial 20 year term, unless either the landowner or the farmer decides that the current term will be last term. In this way, the parties can continuously capture the benefits of a long term lease. The benefits include:

- (1) More commitment by the rancher to invest in infrastructure and repairs;
- (2) Improved public enjoyment of the seashore because ranches would more likely be maintained better;
- (3) More likely that banks will offer loans to the rancher;
- (4) More likely that ranchers will invest in long term rangeland improvements;
- (5) More likely that ranchers will invest in resource conservation projects;

- (6) More rancher eligibility for resource conservation project grants;
- (7) Reduced NPS staff time and paperwork;
- (8) Reduced rancher stress as permits near expiration;
- (9) Facilitated meeting of project objectives into the future;
- (10) Creation of more public trust that NPS actually does support the long term continuation of ranching and farming in the project area; and
- (11) Increased security and incentive for the next generation ranchers within the project area to continue the family farming tradition.

Concern ID:

51728

CONCERN STATEMENT:

Commenters made specific requests pertaining to their personal lease/permits. One submitted an application for a new special use permit (SUP) while the other stated that they were reinstating their first right of refusal on grazing rights.

Representative Quote(s):

Corr. ID: 3063

Representative Quote: If a NEPA process was not initiated to remove our family and change the use of our ranch to an elk preserve, a NEPA process should not be necessary to return our family to continue what appears to be what Congress intended. Given this fact, and that a NEPA process is underway that includes the future management of the D Ranch, I would ask that the reviewers include my request to return to the D Ranch to carry on my family tradition. I have included my application (Attachment 3) to PRNS to obtain one of the new special use permits (SUP) to resume responsibility for the D Ranch, including the buildings and rangeland.

Corr. ID: 3073

Representative Quote: I'm writing to request that Rancho Baulines be included in the Comprehensive Management Plan EA. As you know I leased Rancho Baulines for 33 years and ran cattle and horses. I took pride in the management of the old homestead and it's lands. I have no desire to lease the Ranch House again but would like to reinstate my first right of refusal on the grazing rights.

Concern ID:

51730

CONCERN STATEMENT:

Commenters would like the Ranch CMP to consider an alternative that defines a process or guidelines for lease/permit succession to ensure the future of ranching and farming at Point Reyes National Seashore and in Marin County.

Representative Quote(s):

Corr. ID: 1038

Organization: The Wildlife Trust

Representative Quote: Inheritance of PRNS lease/permits: The Ranch Management Plan must explicitly hold to the original intent of the PRNS founding principles:

*Current and succeeding lease/permit holders must have a direct blood-line connection to the owner of the assigned ranch at the time of the founding of PRNS in the year 1962.

* Lease/permit parcels must include a residence for the exclusive use of the Lease/permittee.

* The lease/permittee must live in this residence on a full time basis, as their official residence.

* Failure of any lease/permittee to comply with any of these conditions shall terminate the associated lease/permit.

Corr. ID: 2988

Representative Quote: Succession - The Ranch CMP should make clear what the procedures are if a lessee/permittee dies or leaves the business. The plan should make an explicit commitment to keeping the current ranch lands in agriculture whenever possible, and the question is how to accomplish that. Here is the hierarchy of options that I suggest for the preferred alternative:

- For over a century, the common practice has been for ranch ownership or leases to go to the children of a rancher if they want to continue ranching. The Seashore has given the first choice to immediate family members, and that practice should continue.

- Before the Seashore existed, ranchers were much freer to make the fundamental business decisions about changing the scale of their operations by buying or selling ranch businesses and, in the Shafter/Howard era, giving up or taking on a lease. Because the ranches in the Seashore are small in comparison to many in California, and because scale may be an important constraint to viability, second choice should go to neighboring ranches, another practice with precedent in the Seashore. (However, in the case of dairies, there should be a priority given to keeping the ranch operating as a dairy if there is an existing dairy in the Seashore that wants to expand its operation.)

- Using the same justification, if neighboring ranches do not exercise the option, third choice should go to other ranches in the Seashore.

- If none of the above results in an SUP, use some mechanism to put the land out for bid for agriculture, perhaps using something like the RFP process for farms at Cuyahoga Valley National Park. In this circumstance, it would be a positive outcome if some long-term workers on local ranches had the opportunity to acquire an SUP, much as the tenant forebears of the current ranchers had the opportunity to buy ranches from the Shafter and Howard estates. However, its not clear to me how the Seashore could do the social engineering that would give preference to a particular group as opposed to an RFP process open to anyone.

For all four of the above, sub-letting should not be allowed.

Corr. ID: 3025

Representative Quote: Maintaining 20 year leases is crucial especially for succession plans. The CMP should make clear what the procedures are if a lessee/permittee dies or leaves the business. The plan should make the commitment that current ranches are kept in agriculture whenever possible. To do this I suggest the following:

" First choice is given to immediate family member. Subletting should not be allowed. Family members take great pride in the businesses and land that they have cultivated and should at least have the option to continue farming it after the named lessee has passed.

" Second choice should be to neighboring ranches which have precedent in

the Seashore, subletting should not be allowed.

" Third choice should be to other ranches/ranchers in the Seashore. Again, subletting should not be allowed.

" Fourth choice should be, if in a position to do so, leasing to an employee of the ranch.

Concern ID:

51731

**CONCERN
STATEMENT:**

Commenters would like the Ranch CMP to consider an alternative with lease regulations modeled on the Cuyahoga Valley National Park's "Countryside Initiative."

**Representative
Quote(s):**

Corr. ID: 2775

Representative Quote: New long term leasing regulations could be modeled on the Cuyahoga Valley National Park's "Countryside Initiative." Lessees would be supported in the continued adoption of ecologically sustainable farming practices, including organic and carbon-benificial practices. In order to encourage a sustainable combination of agricultural land uses, a diversity of food and fiber crops would be possible, in addition to dairy and beef operations and value added products and processing.

Corr. ID: 2960

Organization: Marin Conservation League

Representative Quote: Consider using long-term leasing regulations that could be modeled on the Cuyahoga Valley National Park's Countryside Initiative. With Cuyahoga as precedent, the park could lease the land directly to ranchers and enter into an agreement for day-to-day management by a nonprofit partner whose board could include farm advisors and other Marin ranchers, who are peers within the local ranching community. In the Cuyahoga example, the nonprofit partner "provides technical information and guidance on sustainable agriculture, helps prioritize rehabilitation of farm properties, recruits and evaluates prospective farm lessees, and will evaluate and monitor each farm's annual operation plan"

Corr. ID: 3074

Organization: Sonoma State University

Representative Quote: PRNS could easily follow the model of Cuyahoga Valley National Park (CVNP), with its Countryside Initiative bringing agricultural use back to parts of that park after decades of absence. Starting in 1999, CVNP has worked with a non-profit cooperating partner, the Countryside Conservancy, to reestablish working agriculture via rehabilitating historic farms and farmland and offering long-term leases, up to sixty years in length, via a competitive proposal process as a way of resurrecting and maintaining the rural character of the valley. In its 2011 RFP seeking new proposals from leasees, CVNP even referenced the importance of parks as lived-in places:

Farming in a national park (or any other park) is a most unconventional idea in America. Americans tend to perceive parks as places to visit, not live in- regardless of whether it is a Yellowstone-like wilderness, or a manicured metropark. That is not the case in many other parts of the world. In Great Britain, for example, over 10% of the English landscape is located within the

boundaries of a national park-over 90% of that is privately owned, and most of it is in farms. In Great Britain, farming in the boundaries of national parks is considered the only practical way to maintain the openness, beauty, and diversity of the countryside.

Concern ID:
CONCERN
STATEMENT:

51734
Commenters stated that, during the development of alternatives, the Ranch CMP should consider establishing a set of transparent rules/regulations, goals, and actions that are applied consistently across all lease/permits, including: providing a consistent evaluation tool; enforcing accountability for non-compliance of rules/regulations; publically releasing residual dry matter (RDM) on an annual basis; ensuring transparency of information of discounts offered to lease/permit holders along with rationale for offering discounts; providing incentives to ranchers the provide environmental services not required by lease/permit; and reevaluating of stocking rates. Commenters also suggested development of a mechanism to monitor and repair fences. One commenter stated that, during the development of alternatives, the Ranch CMP should reassess the criteria for AUM allowed in lease/permits.

Representative
Quote(s):

Corr. ID: 3032 **Organization:** California Cattlemen's Association
Representative Quote: Additionally, it is important that the permits and permittees on PRNS be treated uniformly and fairly. As mentioned in the letter presented by the PRSRA to NPS for this public scoping comment period, it appears that there are a number of areas where certain management guidelines are not applied to some ranchers, or where management practices are not uniformly enforced (e.g., range management practices, maximum stocking rates/densities, etc.). It is important that NPS be consistent in its treatment of permits and permittees, to avoid putting certain ranchers at a competitive disadvantage. Though we acknowledge that every ranch is unique and that permit conditions will likely reflect this reality, it is important that these permits be treated as consistently as practicable.

Corr. ID: 1140 **Organization:** Environmental Action Committee of West Marin
Representative Quote: Public Documents and Public Process: Will the 20-year leases become public documents? Public oversight of the Seashore ranch provisions will help ensure the goals of the Ranch Plan are met.

Corr. ID: 2998 **Organization:** Save Our Seashore
Representative Quote: 1.Reassess AUM criteria in light of breeding techniques that increased livestock weights

2.To assure consistency, AUM criteria should be in one PRNS-wide document, not in individual SUPs

Corr. ID: 3022 **Organization:** University of California Cooperative Extension
Representative Quote: Clarify NPS expectations and rancher commitments to ensure consistency of agricultural lease/permits and review and update permit structure to reflect decisions made through this plan. Consistency between SUPs for the various ranches is important so that each ranching

family has an equitable opportunity for operating a sustainable livestock operation and for diversification. We also encourage you to re-evaluate stocking rates so that they consistently reflect the carrying capacity of each ranch, and allow flexibility in stocking for the benefit of different types of ranching operations and natural resource management. Current stocking rate/density limitations between ranches are arbitrary. Information on calculating stocking rates can be found at:

<http://www.carangeland.org/images/GrazingHandbook.pdf>

<http://ucanr.edu/sites/RangelandES/>

<http://californiarangeland.ucdavis.edu/>

http://californiarangeland.ucdavis.edu/Annual_Rangeland_Handbook/

Corr. ID: 3038

Representative Quote: Establish a set of transparent rules/regulations, goals and actions that are applied consistently across lease-based operations. Provide a consistent mechanism for evaluating, modifying and enforcing these rules/regulations, goals and actions - including accountability for what happens when they are not met both on the part of NPS and the leasee (e.g. if an NPS goal is to evaluate RDM on an annual basis, NPS must report publicly via website that it failed to evaluate RDM during a given year).

Provide transparency, consistency and itemization of discounts given to leasees and a detailed basis for charges to each leasee (e.g. riparian exclusion fence maintenance -\$100.00; 70 elk grazing at 0.40 AUM \$-196.00). Provide incentives to leasees for compliance and efforts to go above and beyond meeting NPS resource goals (e.g. riparian fence maintenance discount). Discounts should be for circumstances not encountered on off-park ranches.

Corr. ID: 3055

Representative Quote: The park's legal capacities as landlord: The new leases need to provide the NPS the capacity to effectively manage its tenants. Specifically (and in consideration of some recent behavior by tenants) the leases need to provide redress for illegal (and particularly criminal) behaviors as well as unpermitted activities that are harmful to the Park. Recognize over-reach and chronic non-compliance by certain ag producers. Serial non-compliant leaseholders and those operating standards run counter to Park values and purpose should not automatically be given renewals when leases expire.

**Concern ID:
CONCERN
STATEMENT:**

51735

Commenters stated that a range of lease/permit prices, terms and fees should be considered based on various factors, including: fair market value, income of ranchers, commodity prices, financial viability of a ranch operation, number of cattle, and grazing area. One commenter indicated that the Ranch CMP should consider an alternative that reduces lease prices for ranchers that are adversely affected by tule elk. Another commenter made several suggestions relating to lease/permits, including: conducting appraisals for AUM FMV annually with comparisons of discounts; having permits based on FMV, which include differences in ranches; ensuring that homes are based on

FMV; assessing ranch insurance as it relates to FMV; assessing the possessory tax as it relates to FMV; accruing cost recovery amount (CRA)-FMV after FMV charges with the difference going to the agriculture subsidy; and calculating the annual CRA needed to fund agriculture monitoring and mitigation. One commenter suggested that the Ranch CMP consider an alternative that streamlines the lease process.

**Representative
Quote(s):**

Corr. ID: 1026

Representative Quote: - Streamline the lease process

Corr. ID: 1027

Representative Quote: LEASES

It does not make any difference in the length of the ranch lease terms, if the lessee cannot produce enough income to pay for the lease. Each time a new appraisal is done the rent is increased. There should be some consideration of the amount of income the la can produce. When will the cap on rent increases come into play-when 100 % of the lands production is taken? There has to be a better way of determining lease/rent terms-perhaps a percentage of gross income or a similar factor. If the lessee cannot have the ability to make a product of his choosing, and if the elk are not removed, and if we cannot enhance pasture lands, the lease is not important.

Corr. ID: 2270

Representative Quote: As recently reported by the Los Angeles Times "The park service charges ranchers a grazing fee of just \$7 a month for a cow and a calf. That fee on private land in neighboring communities ranges from \$16 to \$25. The homesteads where some ranch families live are leased to them by the park at less than market rates".

Ranchers have been profiting from low leasing fees for too long. They should pay the fair market fee or move out from the park, which would be the best outcome if this generation wishes to see the recovery of our precious land. Park authorities should take into account the interests of the general public, not those of a selected minority with a high sense of immunity.

Corr. ID: 2998

Organization: Save Our Seashore

Representative Quote: 142.AUM FMVs should be done by two independent Ag appraisers (with PRNS using the average)

143.AUM FMVs required to have third-party-verifiable comparables to assure arms length

144.AUM FMVs once per year for all PRNS ranches instead of every five years for each ranch

145.AUM FMVs should disaggregate discounts and quantify each discount rationale

146.AUM FMV comps required to have same discount accounting to insure apples to apples

147.SUPs should adjust for individual ranch differences based on quantified FMV discounts

148.FMV for homes not on dairies should be the average of two residential

(not ag) appraisers

149. Homes on dairies are necessary part of ag operation and part of ag FMV

150. Assess pooling all required ranch insurance to minimize deductions from FMVs paid to PRNS

151. Assess self-insuring portions of or all insurance to minimize deductions in FMV paid to PRNS

152. Assess not requiring fire insurance on non-historic Ag structures

153. FMVs should include a Possessory Interest Tax calculation that equals the actual tax to be paid

154. PRNS should adjust the Possessory Tax deducted from FMV rents to the actual tax paid

155. Calculate annual cost recovery amount (CRA) needed to fund all PRNS ag monitoring/mitigation

156. Charge FMV but accrue CRA-FMV difference as Ag subsidy and post on Ag webpage

Corr. ID: 3038

Representative Quote: Allow lease prices to fluctuate with commodity value (e.g price of beef, hay) on an annual basis. Provide a simple formula for calculating this value.

Concern ID:

**CONCERN
STATEMENT:**

51737

Commenters indicated that the park needs to determine the length of lease/permits. One commenter suggested that longer leases would encourage good stewardship among ranchers. Other commenters suggested shortening leases to one or two years.

**Representative
Quote(s):**

Corr. ID: 1010

Representative Quote: Length of Authorization. The Park Service needs to discuss and decide how long an authorization should be. Secretary Salazar's statement several months ago that the ranchers should be given 20-year permits was made without NEPA compliance and thus should not be treated as legally binding. Any decision to extend the terms of the leases to 20 years would need to be made again. The Park Service is apparently dealing with that issue in this EA.

Corr. ID: 1018

Representative Quote: Your April 21, 2014 notification indicated that ranch leases/permits can be issued for terms up to 20 years. Please investigate whether, with appropriate statutory and/or regulatory changes, it would be possible to issue even longer-term leases. (After all, the Federal Energy Regulatory Commission issues 50-year licenses.) The longer the term of the lease, the greater the ranch operators' vested interests in keeping the land in good, productive condition and in being good stewards.

Corr. ID: 2125

Representative Quote: If you do lease, it should be at MOST 2 years, and NEVER in the same place. That way the ranchers do not get a chance to squat and get attached to a place they call 'theirs'.

Concern ID: 51739
CONCERN STATEMENT: One commenter stated that the Ranch CMP should clarify that the pastoral zone is not exclusively for agricultural use but also for natural resource protection and recommend a new description of "pastoral zone."

Representative Quote(s): **Corr. ID:** 1038 **Organization:** the Wildlife Trust
Representative Quote: Any Pastoral Zone included in the new Ranch Management Plan must make it clear that this zone is also not for the exclusive use of private commercial cattle operations, but instead, that these businesses must co-exist with and be complimentary to the natural resources of PRNS, including tule elk. Therefore, in the new Ranch Management Plan, the definition of any Pastoral Zone should read: "The designated mapped area within PRNS where, if commercial cattle grazing is to take place, it can take place only within this zone alongside native wildlife." The word "if" here is the operative word, for there should be nothing in the new Ranch Management Plan requiring commercial cattle grazing in the Pastoral Zone - - Only that commercial cattle grazing "may" take place in the Pastoral Zone.

Concern ID: 51740
CONCERN STATEMENT: Commenters stated that the Ranch CMP should consider an alternative that includes changes to lease boundaries as needed to manage natural resources throughout the term of the lease/permit.

Representative Quote(s): **Corr. ID:** 1022 **Organization:** In Defense of Animals
Representative Quote: The NPS controls which area can be used for private ranching leases. Thus, the NPS should adjust boundaries to better manage natural resources by including those areas where elk currently do not occupy and by excluding areas for ranching that tule elk currently prefer. For example, tule elk currently favor habitat around the defunct D Ranch. Consequently, lease permits should be immediately reverted to the NPS and the area be converted to wildlife habitat.

Corr. ID: 1038 **Organization:** the Wildlife Trust
Representative Quote: Adjustment of lease boundaries for Co-existence, if leases/permits are allowed: Basically, the free-ranging tule elk at Pt. Reyes Nat. Seashore are telling us humans where they want to spend most of their time. The research and mapping done by David Press and colleagues greatly helps us to understand the whereabouts of the preferred tule elk locations within PRNS.

The U.S federal government owns every acre of PRNS and these acres are under the supervision of the National Park Service including all the lands under any kind of a lease/permit. Therefore, since the National Park Service controls what specific acres in PRNS will be put out for a private grazing lease/permit, the National Park Service can and should adjust these boundaries to better manage the natural resources of PRNS.

Currently, since the leases/permits expire every year or in the short-term, the

new Ranch Management Plan should re-draw certain lease boundaries to include different coastal prairie land for the leases/permittees in the two main areas where the tule elk are not generally congregating. For Example, the current boundaries and lease/permits for the Drake's Beach region includes an area highly prized by tule elk. This favorite tule elk habitat is based around the defunct D Ranch and as a result, cattle leases/permits for this area should revert back to the NPS as wildlife habitat. The same type of lease boundary adjustment should be made in the popular tule elk area near the "Home Ranch", where cattle lease/permit boundaries can be adjusted to nearby grazing land that are little used by tule-elk.

These preventative boundary changes will greatly help to keep tule elk and cattle from being on top of each other. The number of acres under lease/permit and the forage quality can remain the same as under the original lease/permit boundaries for each of the vested historic ranch families. Costs for making these boundary re-adjustments can be funded by the NPS which will quickly be recovered because of less damage repair expenses, no costly hazing operations and other headaches now involving the NPS and its overworked personnel.

Concern ID:
CONCERN
STATEMENT:

51741
Commenters stated that the Ranch CMP should consider an alternative that includes a review of ranching operations to determine if a lease/permit area is compatible with a free-roaming tule elk herd. If so, the elk should not be disturbed or negatively impacted on those lands.

Representative
Quote(s):

Corr. ID: 1015 **Organization:** Tule Elk foundation
Representative Quote: Those original leases must now be reviewed to assess if those operations can be compatible with free-roaming Tule Elk throughout the entire PRNS lands. Any leases granted must include in the lease agreements a clause that states that free-roaming Tule Elk, a California endemic species, are a natural and integral component of the natural California landscape. Free roaming Tule Elk cannot be harassed, chased, herded, moved or killed in the pastoral lands including any lands with sustainable dairy/grazing leases. The leases must manage their lands in accordance with guidelines provided that incorporate practices to eliminate any negative impacts on the native Tule Elk within the pastoral lands. The leases should be short-term, maybe in 10 increments so that the NPS with public input can reassess the impacts of the dairy/cattle operations on the free-roaming native Tule Elk herds throughout the pastoral lands.

Corr. ID: 1015 **Organization:** Tule Elk foundation
Representative Quote: Only those ranching activities that fully support and are compatible with free-roaming Tule Elk herds throughout the park lands (including the pastoral lands) should be given leases. (See comments above in Question #2 as well).

This is an opportunity to integrate sustainable ranching practices in NPS

lands that actually model sustainable practices with regard to a large, free-roaming, native (endemic) herbivore, which is integral to the native landscape. In this case, the Tule Elk are given priority over non-native exotic European species and the exotic plants that continue to thrive with a cattle operation.

Corr. ID: 2760

Representative Quote: I understand the plight of the farmers and ranchers but tule elk and other wildlife, not cattle, are the indigenous inhabitants of the Coastal Prairie. Their presence is vital to maintain the health of the Prairie. I propose the ranchers, if they want further use of this land to look beyond their immediate concerns and do their part to find ways to protect, restore and rejuvenate the lands they have access to. Otherwise I would recommend no extension of ranching leases.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

51744
[One commenter stated that SUPs should quantify damage due to wildlife.](#)

Corr. ID: 2998 **Organization:** Save Our Seashore
Representative Quote: 3.Quantify (in dollars or % o forage) occasional damage due to wildlife in all SUPs

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

51746
[One commenter indicated that the NPS should clearly state in the Ranch CMP its intention to maintain the pastoral zone designation.](#)

Corr. ID: 3068 **Organization:** Marin Agricultural Land Trust
Representative Quote: We also ask that throughout this process, you clearly state your intention of maintaining the pastoral zone designation within PRNS, and in such a way that encourages the ranchers to thrive.

Concern ID:
CONCERN
STATEMENT:

51747
[One commenter stated that lease/permit conditions should require several components, including the protection of sensitive resources \(through the use of exclusionary cattle fencing\) and the enforcement of RDM requirements. Further, this commenter stated that the definition of AUM should be updated.](#)

Representative
Quote(s):

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: Lease/permit conditions should require installation and maintenance of exclusionary cattle fencing where needed to protect sensitive resources. The CRMP could include a program to help offset costs of fencing. The NPS should actually enforce minimal Residual Dry Matter requirements in lease/permits. The CRMP should also adjust and update the definition of animal unit months at PRNS to help prevent overgrazing and erosion. See the attached information from Western Watersheds Project on review and update of current livestock weights and forage consumption rates.

Concern ID: 51748
CONCERN STATEMENT: One commenter stated that no compensation or incentive should be provided to ranchers for impacts from tule elk because the low lease/permit AUM and acreage provide adequate compensation.

Representative Quote(s): **Corr. ID:** 867 **Organization:** Center for Biological Diversity
Representative Quote: Despite vocal complaints from ranchers, trespass cattle outside of the pastoral zone is a much bigger problem at PRNS than elk grazing inside the pastoral zone. The CRMP should make it explicit that the low AUM rents paid by lease/permit holders (\$7-9 inside PRNS compared to \$15-20 outside) already compensates ranchers for any wildlife impacts.

Concern ID: 51749
CONCERN STATEMENT: One commenter stated that short- and long-term goals developed for leases should be based on science-based criteria.

Representative Quote(s): **Corr. ID:** 1140 **Organization:** Environmental Action Committee of West Marin
Representative Quote: Short and long-term Management goals: Will the Seashore identify short and long-term management goals and metrics to incorporate into the new leases? If so, the Seashore should identify science-based criteria to determine the success of each short and long-term goal. EAC supports providing incentives for lease compliance and simple, easy to understand permits. Additionally, there must be simple, clear consequences for non-compliance with lease terms.

Concern ID: 51750
CONCERN STATEMENT: One commenter suggested that the Ranch CMP provide a provision and process for formal public complaints related to non-compliance of lease terms and BMPs.

Representative Quote(s): **Corr. ID:** 3040 **Organization:** National Parks Conservation Association
Representative Quote: Citizen Monitoring of Compliance: Will the Ranch Management Plan include a provision and process for the public to make formal complaints about non-compliance with lease terms and Best Management Practices? This process could require a formal complaint letter with details and photos, and provide for the Park to perform due diligence and timing to follow-up and respond to the compliant.

AL150 - Alternatives: Ranch Operations, Activities, and Management

Concern ID: 51835
CONCERN STATEMENT: Commenters provided support and suggestions regarding managing ranching operations related to forage and silage (including requirements for managing organically certified livestock forage) such as: feeding animals from pasture; increasing the ability to grow more feed; using tools including fire, mowing, grazing, and planting rangeland forages to preserve the grasslands; adjusting stocking rates to reflect available forage; preventing elk from consuming organic forage; returning pasture that has been taken out of production within the

pastoral zone to ranching; and establishing a monitoring program for silage production and mowing. One commenter stated that these ranch management operations should be implemented immediately.

Representative Quote(s):

Corr. ID: 3022

Organization: University of California Cooperative Extension

Representative Quote: Support sustainable operational practices such as maintaining organic certification, promoting increased energy efficiency, and working towards carbon neutral operations. The most important way in which PRNS can support organically-certified livestock operations is by allowing ranchers adequate forage to support extensive grazing. This can be done by adjusting stocking rates to reflect available forage, removing elk that consume organic pasture from the pastoral zone, and by returning pastoral zone acreage that has been taken out of production to ranching:

<http://www.usda.gov/wps/portal/usda/usdahome?navid=organic-agriculture;>
<http://www.energy.ca.gov/2009publications/CEC-500-2009-009/CEC-500-2009-009.PDF>; <http://www.marincarbonproject.org/>

Corr. ID: 3040

Organization: National Parks Conservation Association

Representative Quote: How does the Seashore ensure that allowances for silage production are followed? Silage production kills hundreds of nesting birds per year. EAC would not support expanded silage production. The Seashore must establish a simple program to monitor silage production and mowing and have penalties where limits are exceeded.

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: (b) Range management practices known to be effective for improving forage quality and quantity should be allowed for all ranchers and farmers in the project area. For centuries, these coastal prairie grasslands have been carefully managed by humans interested in preserving the productivity of these rangelands. Careful management using tools including fire, mowing, grazing and planting rangeland forages have resulted in preserving the lush, productive and bio-diverse grasslands Congress meant to protect. PRNS contains perfect examples of how vital this rancher stewardship is. Where the NPS has allowed ranchers and farmers in the project area to do their jobs, using the above tools, the resource has been protected and is largely unchanged since the Shafter era and when Congress recognized the good stewardship of the Point Reyes ranchers. In essentially every place where NPS decided to end livestock grazing and evict the ranch families, the land stewardship ended. These locations without the ranchers rangeland management have lost their historic grassland character. With the loss of livestock grazing, a change in both plant and animal species assemblages occurred. Where the NPS has chosen to end ranching and the rangeland stewardship provided by the ranchers, the ungulate carrying capacity has largely decreased. The loss of forage due to the lack of land stewardship and lack of range management in these former ranch lands have now contributed to the tule elk crisis. Invasive brush and weeds have invaded these areas to a point that seashore visitors have largely lost access. PRSRA does not believe that the objective of Congress was to allow these fantastic, sweeping, well managed, accessible grasslands to be lost. PRNS allows

some ranchers to use appropriate range management tools and is prohibiting others from using these scientifically proven tools. PRSRA suggests that PRNS treat ranchers and farmers equally and allow every rancher or farmer in the project area to do their jobs, preserving these precious landscapes using the best available range management tools - responsible tools used by land managers everywhere. Allowing ranchers to make range management decisions as they have for generations will help meet the objective stated by PRNS. An EA should not be required for this management strategy to be immediately implemented project area wide.

Concern ID: 51836
CONCERN STATEMENT: Commenters provided suggestions regarding managing ranching operations related to food storage, including requiring dairy workers to cover and monitor feed and water troughs to exclude corvids.

Representative Quote(s): **Corr. ID:** 2998 **Organization:** Save Our Seashore
Representative Quote: 27.Require that dairy workers monitor and cover feed troughs to exclude corvids
72.Assess monitoring water to troughs sufficient for livestock only (like food troughs that exclude corvids

Concern ID: 51837
CONCERN STATEMENT: Commenters provided suggestions regarding managing ranching operations related to hazardous chemicals, including banning second-generation rat bait on ranches and minimizing the use of chemicals and pesticides.

Representative Quote(s): **Corr. ID:** 867 **Organization:** Center for Biological Diversity
Representative Quote: A management plan for storage of chemicals including gasoline, diesel, pesticides, antibiotics, etc. should be developed to ensure these chemicals are not released into the environment. These plans should be comprehensive and include measures that are adequate to prevent their release in the event of accidents or natural disasters such as fires, earthquakes, etc.

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: Pesticides and pharmaceuticals used for livestock or rangeland management should be identified and monitored. Integrated pesticide management plans should be created that eliminate, reduce and/or replace harmful chemicals that can escape into the environment. Livestock health management plans should be created that eliminate and reduce and/or replace harmful chemicals that can escape into the environment.

Corr. ID: 2998 **Organization:** Save Our Seashore
Representative Quote: 28.Ban 2nd generation rat bait for use on ranches
38.Minimize use of chemicals for ranch maintenance and in ranch housing

Concern ID: 51838
CONCERN STATEMENT: Commenters provided suggestions regarding organic certifications, including implementing buffers for organic certification, assessing the value of organic certification, and actively supporting the pastoral zone to maintain organic

Representative Quote(s): [operations.](#)
Corr. ID: 1009 **Organization:** Marin County Agricultural Commissioner
Representative Quote: Interestingly, all dairies in the Seashore area are Certified Organic under the USDA National Organic Program, certified by the Marin County Agricultural Commissioner and other accredited organic certifiers demonstrating the progressive nature and willingness to support animal health, and environmental protection. Collectively the entire Pastoral area of the Seashore Agricultural region represents one of the largest contiguous organically certified areas in California, possibly the nation. This is a pinnacle in terms of production model and land sustainability. The National Seashore should actively support, including financial support, the entire Pastoral Zone to maintain and grow Certified Organic farm operations and showcase this success story of partnership and collaboration to the public.

Corr. ID: 2998 **Organization:** Save Our Seashore
Representative Quote: 29.Map and signpost buffers required on ranches for organic certification
63.Assess value to organic certification of 2014 lifting of 30% frage requirement vs elk removal

Concern ID: 51839
CONCERN STATEMENT: [Commenters provided suggestions regarding managing ranching operations related to ranching fences, including removing abandoned fences, requiring wildlife-friendly fencing, and removing a pig fence.](#)

Representative Quote(s): **Corr. ID:** 2998 **Organization:** Save Our Seashore
Representative Quote: 30.Remove abandoned Ag fencing
31.Require wildlife-friendly fencing (no barbs top or bottom)

Corr. ID: 3073
Representative Quote: Take out the pig fence put in by the county. It has created an earthen dam across the water course in the front field and diverted the water from the wetland on the other side of the Fairfax road, to the ever-growing Willow Grove. There were once fish and salmon in the creek now there is neither.

Concern ID: 51840
CONCERN STATEMENT: [Commenters provided suggestions regarding managing ranching operations related to livestock treatment, including mandating humane methods for dehorning and banning the use of veal crates.](#)

Representative Quote(s): **Corr. ID:** 2998 **Organization:** Save Our Seashore
Representative Quote: 51.SUPs should mandate least painful methods to dehorn livestock
52.Ban use of veal crates per American Veal Association group housing resolution

Concern ID: 51841

**CONCERN
STATEMENT:**

Commenters provided suggestions regarding ranching operations related to public awareness and education, including: promoting public awareness via a website; enhancing visitor and rancher education; adding a demonstration museum; adding visitor experience opportunities such as B&B farm stays, roadside stands and demonstration museums; and increased collaboration with ranchers.

**Representative
Quote(s):**

Corr. ID: 28

Representative Quote: -Allow ranchers to have B&B facilities in order to educate the public as to what a ranch is.

Corr. ID: 30

Representative Quote: -Roadside stands should be for ranch's own products. Demonstration museums could be benefit for farms/ranches (e.g., weaving if a site had sheep and/or goats.

Corr. ID: 2998

Organization: Save Our Seashore

Representative Quote: 73.Promote public assurance re PRNS Ag monitoring and Rancher compliance with a PRNS Ag website

86.Enhance education of visitors not to interfere with ranch operations (open gates etc)

87.Enhance education of ranchers who attempt to prohibit visitors from accessing public Ag lands

Corr. ID: 2998

Organization: Save Our Seashore

Representative Quote:

**Concern ID:
CONCERN
STATEMENT:**

51842

Commenters provided suggestions regarding ranching operations related to waste, including banning compost until impacts to vegetation are proven, capturing methane from manure, and using anaerobic digesters (which could utilize climate-offset funding).

**Representative
Quote(s):**

Corr. ID: 30

Representative Quote: -Capture methane from manure - model Strauss.
-Promotion of livestock waste digestion (anaerobic digesters) using climate offset funding via the climate registry. Big water quality benefits. Consider cooperation between dairies.

Corr. ID: 2998

Organization: Save Our Seashore

Representative Quote: 91.Ban compost use on rangelands until CO2 impacts are proven

92.Ban compost use on rangelands until native plant impacts are proved

**Concern ID:
CONCERN
STATEMENT:**

51843

Commenters provided suggestions regarding ranching operations related to agricultural workers, including: encouraging overtime pay, clarifying that employee housing is available on-site, clarifying that sublets for non-agricultural

employees are prohibited, publishing criteria for new operators, and improving living conditions.

*Representative
Quote(s):*

Corr. ID: 34

Representative Quote: Is there a way for the park service to influence the wages and fair housing of the workers in the business in the park. I am sure wages and housing are fair for park employees. How to influence the businesses is a question. The underclass that is necessary to support the food industry (and maybe any animal handling, like the stables) needs to be acknowledged and supported to help us all become better people.

Corr. ID: 2998

Organization: Save Our Seashore

Representative Quote: 105. Encourage ranchers to pay overtime for ag workers working >8 hrs /day and >40 hrs/wk

106. Clarify that housing for workers at other PRNS ranches is allowed on-site

107. Clarify that sublets for non-ag residential purposes is not allowed

110. Publish criteria for new operators that includes record of good landlord/tenant relations

111. Publish criteria for new operators that includes record of good sustainable Ag performance

Corr. ID: 3022

Organization: University of California Cooperative Extension

Representative Quote: Promote the health and safety of agricultural workers on ranch lands. Numerous existing pertinent regulations that employers are obligated to adhere to are already in effect. There is no need for PRNS to duplicate efforts:

https://www.osha.gov/dsg/topics/agriculturaloperations/hazards_controls.html;

<http://www.westernuniteddairymen.com/labor-mainmenu-50>

<http://www.dir.ca.gov/>

Concern ID:

**CONCERN
STATEMENT:**

51844

Commenters provided suggestions regarding ranching operations related to diversification, including: only allowing diversification under certain circumstances, limiting diversification income to less than 20 percent of ranching/dairy income, clarifying that raising non-traditional livestock is diversification, never allowing on-site slaughtering; prohibiting row crops, and encouraging diversification.

*Representative
Quote(s):*

Corr. ID: 12

Representative Quote: Ranchers should not be allowed to start row crops. Compared to pastoral lands, crop land provides few or no resources for breeding birds and has resulted in a widespread loss of wildlife habitat. Allowing the start of row crops will result in more erosion and water pollution. In a US National park, wildlife should take precedence over economic growth of the ranchers.

Corr. ID: 2998

Organization: Save Our Seashore

Representative Quote: 121. Diversifications should be only allowed when operator has no other place outside PRNS

122. Diversifications should be only allowed when operator has no other business operation
123. Diversifications should be only allowed in few acres around ranch center previously disturbed
124. Diversifications income should not be more than 20% of estimated ranching/dairying income
130. Clarify that raising non-traditional livestock (water buffalo, llamas, etc) is a diversification
131. Diversification should never allow on-site slaughtering

Concern ID:
CONCERN STATEMENT:

51845
Commenters provided suggestions regarding ranching operations related to BMPs and implementing adaptive management. Suggestions relating to BMPs included: encouraging and incentivizing BMPs, harmonizing BMPs with other federal and state practices, utilizing management-intensive grazing, and managing for carbon sequestration. One commenter also suggested that ranchers should be allowed to manage based on their knowledge of pasture, water, natural resources, and livestock operations.

Representative Quote(s):

Corr. ID: 30
Representative Quote: -Harmonize CMP BMP's with other existing agency BMP's (e.g., USDA/NRCS, State CARDD, RCD's).
Corr. ID: 3022 **Organization:** University of California Cooperative Extension

Representative Quote: Define best management practices to promote protection of park resources and streamline park and regulatory review and approvals of proposed ranching activities. Best Management Practices is an outdated term that implies that there is a best way to manage. In reality, myriad management practices may be best, depending on site conditions, management objectives and resources. The Natural Resources Conservation Service (NRCS) practices listed in the scoping documents are mostly structural and represent only a small number of potential range management practices. Rather than defining what practices are best PRNS should recognize the ranchers knowledge of pasture, water, natural resource and livestock management, and allow them reasonable latitude to work with range management experts, as needed, to manage their operations within flexible parameters:

<http://casrm.rangelands.org/HTML/pubsnews.html>;
http://californiarangeland.ucdavis.edu/UC_Range_-_Livestock_Publications/.

Corr. ID: 3040 **Organization:** National Parks Conservation Association

Representative Quote: EAC supports the incorporation of BMPs into the 20-year leases. How will the Seashore measure success of each BMP? One management practice that is necessary is to transition cattle out of the wetlands and headwaters of all the bays of Drakes Estero. These sensitive areas should be fenced off to maintain water quality and only allow flash grazing as necessary and based on set protocols.

Corr. ID: 3076 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: (e) Best Management Practices (BMP) listed in the EA

materials should not only be allowed by PRNS, they should be encouraged and perhaps incentivized by PRNS. All of these practices are implemented to improve environmental quality while preserving seashore ranchers livelihoods. Added to the list of BMPs should be management intensive grazing (MIG) for those ranchers interested. MIG provides a multitude of rangeland, wetland and riparian zone benefits when planned and implemented properly. MIG is allowed on some seashore ranches and should be allowed for all interested ranchers in the project area. Another emerging, yet crucial BMP is managing the rangelands in a fashion proven to sequester carbon. By following standards set by the Marin Carbon Project (MCP), supported by peer-reviewed science, the project area rangelands could offset all GHG production emitted from PRNS. PRNS should encourage the seashore ranchers interested in employing these MCP practices. The results of following the MCP practices are:

- (i) Increased organic matter in the soil;
- (ii) Increased soil carbon as a result of increased photosynthesis;
- (iii) A reduction in atmospheric CO₂; (iv) Increased soil water holding capacity;
- (v) Improved water quality in storm water runoff; (vi) Reduced storm water runoff; and
- (vii) Improved forage production.

Concern ID:

51846

**CONCERN
STATEMENT:**

Commenters suggested the park should further regulate mowing and blading of brush-lands. Other commenters suggested that there should be more control of invasive plants.

**Representative
Quote(s):**

Corr. ID: 3055

Representative Quote: Mowing and blading of brush-lands needs to be reined in. In recent years it seems that weed (thistle) control has been used as a thin excuse for wholesale flail-mowing of brush-lands. The Park needs to provide adequate resources to help ranchers manage pastures in a manner that does not profoundly compromise the grassland and brush-land habitats. Unpermitted mowing should not be tolerated.

Corr. ID: 3060

Representative Quote: " Rangeland improvement- Because both native and exotic plants inevitably invade rangeland over time, the quality of the rangeland and the amount of grazing it can sustain declines. For grazing to continue long term, it is essential for ranchers to be able to reverse this process periodically to maintain the quality of the rangeland. In addition, the certification of substantial areas of rangeland as organic in recent years increases the need for new tools to manage vegetation. The Ranch CMP preferred alternative should generally allow, with reasonable conditions*, clearing of invasive alien plant species and natives such as iris, coyote brush, Juncus, lupine, etc. Conditions might relate to slope, buffers along water courses, concentrations of plants that are species of concern, seasonal impacts on birds, mechanical and chemical removal of plants, leaving islands of habitat in cleared areas, etc.

Concern ID:

51847

CONCERN

One commenter suggested that the park prohibit the use of ranch dogs.

STATEMENT:

Representative

Quote(s):

Corr. ID: 3055

Representative Quote: Coyote dogs. A couple of ranches have large white dogs (Great Pyrenees?) roaming out in their fields, presumably for coyote control. These dogs are aggressive to humans and presumably to any of the natural predators found in the Park. Natural predators have an essential part in a healthy ecosystem and need to be tolerated within the Park. Remove the small agriculture species (goats, chickens, and ducks) that need protection from coyotes and do not permit the use of these dogs. This is also a visitor experience issue: park visitors should not have to face untended, unfriendly large canines as they visit the Park.

Concern ID:

**CONCERN
STATEMENT:**

51848

Commenters suggested that permits for low-impact projects should not be required, that the permitting process should be quicker, and that processes for maintaining and repairing historic structures should be streamlined.

Representative

Quote(s):

Corr. ID: 3059

Representative Quote: The freedom to do low impact projects and daily maintenance without having to ask permission and triggering a full blown study every time. Some projects need to happen in real time and we cannot always wait for an answer.

Corr. ID: 3071

Organization: Historic B Ranch

Representative Quote: Streamline process for historical building maintenance- All of the ranches in the seashore have historical buildings. The park service seems to cherry pick which structures they want to maintain. That practice is fine, but the ranchers should be allowed to use alternative cheaper materials to fix a structure as long as the historical dimensions are the same.

Corr. ID: 3080

Organization: McClelland's Dairy

Representative Quote: Ranches need constant upgrading and maintenance. These Ranchers need to have the project approval process streamlined so they can make the proper improvements in a timely fashion. NRCS and FSA could be good resources that the PRNS and ranchers can use to review projects for either party and to determine impacts on the ranches.

Corr. ID: 3084

Organization: L Ranch

Representative Quote: Approve projects faster. Especially low impact projects such as installing fencing and other maintenance projects. Also consider the possibility of building new agriculture structures.

Corr. ID: 3085

Organization: Marin Resource Conservation District

Representative Quote: Evaluate existing local, state and federal regulatory framework against any new PRNS authorizations for proposed ranch activities to ensure they are not duplicative. In many instances, existing permitting structure exists for the protection of natural resources and farming practices

through our federal and state agencies. Support the ranchers by streamlining the approval process so that they may implement new and innovative projects which allow them to remain viable in their operations.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

51849
[One commenter suggested that additional water sources should be sought.](#)

Corr. ID: 3065 **Organization:** J Ranch
Representative Quote: Access to Alternative Practices

One of the issues that the J Ranch, as with many ranches all over the state of California, has had the last five years is a water shortage. The extreme drought, this year specifically, has been a major problem for all ranches within the Point Reyes National Seashore. Water development will be a major need in the next few years if the drought persists. We have to expand on the water sources that we currently have in place. Enlarging our dam, digging more wells, or using the creek as a backup for a major water supply should be used as a plan during the drought years. We have been allowed to pump water from a creek at the Kehoe Beach Trail Head for 3 out of the last 6 years. This has rescued us as a water source for our animals in the last major drought.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

51850
[One commenter suggested that the ranches inside the park should be able to perform similar practices to those ranches outside the park.](#)

Corr. ID: 3069 **Organization:** McClure Dairy, Inc
Representative Quote: We feel that ranches inside the park should be able to perform similar practices to those ranches outside the park. It is important to not have a competitive disadvantage. It is necessary for the mutual benefit of ranches inside and outside the park to maintain a critical mass to sustain repair services, veterinarian, ranch supplies, feed companies, etc.

Concern ID:
CONCERN
STATEMENT:

51851
[One commenter advocated for specific operational changes and diversification at the Lunny Ranch, including: restoration of dairy operations, enhancement of crop production, allowing for production and harvest of non-forage crops, restoration of hog and small chicken production, allowing for building of new structures, allowing for on-farm sales, and providing new housing.](#)

Representative
Quote(s):

Corr. ID: 3083 **Organization:** Lunny Ranch
Representative Quote: 10. Provide 2 new worker residences within the ranch building complex. Issues to consider are:
a. This use existed on the G Ranch during the Shafter era;
b. Allows the Lunny Ranch to compete for good employees; and,
c. Allows for the necessary staff for round the clock emergency work often encountered on a dairy.

Corr. ID: 3083 **Organization:** Lunny Ranch

Representative Quote: 1. Restore the dairy operation. The Lunnys operated a Grade A dairy for most of its tenure on the G Ranch. The dairy was closed and the operation was converted to a beef operation due to a downturn in milk prices in the late 1970s. Now, as the economic realities have changed dramatically, the highest and best use of the G Ranch includes a dairy. With a dairy, it will more closely resemble the Shafter era ranching on Point Reyes.

Issues to consider are:

- a. This use existed on the G Ranch during the Shafter era;
- b. Pollution control - Almost all of the necessary pollution control infrastructure is still in place. The manure sump near the dairy still exists, the pipeline out to the manure lagoons still exists and the manure lagoons still exist;
- c. Concrete cattle handling corrals still exist;
- d. Milking barn still exists, but the interior will need to be remodeled;
- e. Feeding areas and feed storage areas still exist; and,
- f. PRNS has already allowed other previously closed dairies to resume operations.

Corr. ID: 3083

Organization: Lunny Ranch

Representative Quote: 5. Restore small scale chicken production. Issues to consider are:

- a. This use existed on the G Ranch during the Shafter era;
- b. Both eggs and meat will be produced;
- c. Chickens will be pastured;
- d. Chickens will be used to enhance pasture management; and,
- e. Chickens will be used to help control parasites within organic pastures.

Corr. ID: 3083

Organization: Lunny Ranch

Representative Quote: 3. Enhance row crop production. Issues to consider are:

- a. This use existed on the G Ranch during the Shafter era;
- b. This use currently exists on the G Ranch;
- c. Acreage will be expanded from about 6 acres to about 30 acres;
- d. Production will be located on land that is currently authorized for crop (forage) production;
- e. Production will focus on crop species that were historically grown during the Shafter era, including artichokes, beans and peas; and,
- f. Production will include dry-farming techniques.

Corr. ID: 3083

Organization: Lunny Ranch

Representative Quote: 8. Begin direct on-farm sales if PRNS forces closure of the Drakes Bay Oyster Company farm store now directly marketing Lunny Ranch farm products. Issues to consider are:

- a. Provides opportunities for the visiting public to connect with the working landscapes;
- b. Provides educational opportunities;
- c. Provides additional income to the Lunny family by capturing the retail prices of our farm products instead of only commodity wholesale prices; and,
- d. Requires new construction.

Corr. ID: 3083

Organization: Lunny Ranch

Representative Quote: 4. Restore small scale hog production. Issues to consider are:

- a. This use existed on the G Ranch during the Shafter era;
- b. The hogs will utilize the whey from the butter processing and the waste vegetables from the row crop operations; and,
- c. This use will avoid disposal of the above ranch resources.

Concern ID:
CONCERN
STATEMENT:

51852
One commenter requested for specific operational allowances for the Drakes Bay Oyster Company, including: approving the development of retail and kitchen space to all of the ranchers to sell their products, and approving the addition of BBQ pits in existing picnic areas.

Representative
Quote(s):

Corr. ID: 3079 **Organization:** Drakes Bay Oyster Co
Representative Quote: The space will also include retail space, as use that has always been authorized at this location. This will provide what could be a vital location for all interested seashore ranchers and farmers to sell their products- -a farmers market in the middle of the farms, as it were. Continuing the historic retail activity and making it available to other seashore ranchers would:

1. Reduce the need for other interested ranchers to build on-farm retail areas
2. Add to the viability of all interested seashore ranchers by having market;
3. Allow more collaborative opportunities between seashore ranchers
4. Improve visitor experience by having a more diverse selection of produced products;
5. Improve visitor experience by seeing the history center where they are purchasing the local food, resulting in a deeper connection to the f the landscape; and,
6. Continue to provide many of the same services already provided by DBOC to approximately 50,000 visitors per year.

The building would provide safe, clean, fully maintained ADA compliant restrooms for the visiting public.

Corr. ID: 3079 **Organization:** Drakes Bay Oyster Co
Representative Quote: DBOC would ask the EA to evaluate adding a commercial kitchen inside the new processing building. This kitchen will be made available to all ranchers within the PRNS and GGNRA for the safe, legal processing of their own value add products. This would solve an important impediment to entering local markets with small scale value added products. Allowing this kitchen would:

1. Reduce the need to construct commercial kitchen processing facilities on individual ranches;
2. Solve the current unavailability of local commercial kitchen space
3. Encourage collaboration between ranchers on value added products, and
4. Add to the viability of DBOC as well as all interested seashore ranchers.

DBOC plans to make the main open space within the building a museum Shafter era through the present ranching operations within the project area with pictures and objects for the education and enjoyment of the public visiting the

pastoral zone. All ranchers will be invited to participate in the planning of this space.

The shellfish processing portion of the approved space may or may not be constructed, depending on the future status of shellfish production in Drakes Estero.

Corr. ID: 3079 **Organization:** Drakes Bay Oyster Co
Representative Quote: DBOC will continue to maintain a safe picnic area. Thousands of visitors every year enjoy picnicking near the edge of Schooner Bay, across from the historic Schooner Landing where milk, cheese, butter, cattle, hogs and many other products from the Point Reyes Ranches were loaded for their trip through Drakes Estero, into the Pacific Ocean and through the Golden Gate. DBOC also requests that this EA evaluate the effects of installing safe BBQ pits, similar to units installed at Drakes Beach. Continuing the picnic area with BBQs would:

1. Improve visitor experience;
2. Improve the sale of the seashore ranchers products; and,
3. Reduce the hazard caused by the visiting public bringing their own BBQ

Corr. ID: 3079 **Organization:** Drakes Bay Oyster Co
Representative Quote: DBOC also asks that this EA analyze the effects of selling prepared food at the site. PRNS has always authorized restaurant operations inside the seashore at Drakes Beach. Authorizing the sale of prepared food produced by seashore ranchers would:

1. Add value to the food that would add to the viability of DBOC a interested seashore ranchers;
2. Improve visitor experience by increasing food choices;
3. Add new ways for visitors to the pastoral zone to leave with a taste of the place; and,
4. Help to justify the large expense to install a commercial kitchen.

Concern ID: 51863
CONCERN STATEMENT: [One commenter cited efforts to eliminate predator impacts to livestock utilizing non-lethal methods. Suggestions for managing predators included the use of guardian animals, fencing, and sound and/or lighting devices.](#)

Representative Quote(s): **Corr. ID:** 2986 **Organization:** Marin Humane Society
Representative Quote: Through this program ranchers and County officials (through the Agricultural Commissioner's Office) work to keep predator species like coyotes from impacting livestock. These efforts are done through non-lethal methods such as with the use of guarding animals, fencing, sound and light devices, etc. This program has proved to be successful and the number of livestock predation cases drops each year. We would love to see ranchers in the Park have access to such a program to assist them in this area.

Concern ID: 52152
CONCERN [Commenters provided suggestions regarding managing ranching operations](#)

STATEMENT:

related to ranching infrastructure, including: repairing ranch roads to minimize sedimentation, invasive species, and fecal deliveries; allowing ranchers to mine gravel; repairing ranch infrastructure; clarifying that capital improvements must be done by SUP milestones; using sustainable power in new buildings; and staging emergency equipment at ranches to better prepare for emergencies.

Representative Quote(s):

Corr. ID: 30

Representative Quote: -Any new buildings should use sustainable power.

Corr. ID: 1140

Organization: Environmental Action Committee of West Marin

Representative Quote: Diversification: What level of diversification of agricultural production could be allowed under the original legislation for the Seashore? EACs reading of that legislation is that it provided for ongoing dairies and cattle ranch operations. Under what authority could the Seashore justify allowing anything greater than a small area, perhaps 1-2 acres per historic farm, of diversified agricultural use.

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: On farm borrow sites should be allowed for PRNS rancher rock needs.

Historically, seashore ranchers utilized small on-farm rock resources for road maintenance and armoring high traffic livestock areas including gateways, water troughs and holding pens. The native Monterey shale present on some ranches is softer and less angular than typical purchased crushed rock, making it the perfect choice for livestock. A few years ago, PRNS closed these important local resources. This has caused ranchers to spend significant amounts of money to purchase rock and have the rock trucked long distances. The purchased rock is generally hard, crushed rock with angles and sharp points risking injury to livestock hooves. PRSRA suggests that the EA consider allowing seashore ranchers to resume the historic use of at least one, two or three of the many sites that have recently been disallowed by PRNS. This NEPA process should consider the benefits of using on-farm resources in lieu of long distance trucking. PRSRA is willing to assure PRNS that the required reclamation plan is in place with the California Department of Conservation. This will give the guarantee to PRNS and the public that the small quarries will eventually be properly reclaimed with soil cover and appropriate vegetation. PRSRA suggests that the rock can be used only within the project area and could not be sold for any other purpose. This is an opportunity for PRNS to collaborate with the seashore ranchers to improve ranch conditions and profitability while furthering the PRNS stated plan objectives. Restoring this historic activity would result in:

1. Improved ranch road maintenance resulting in less erosion and resource damage;
2. Reduced large truck traffic on the narrow PRNS roads;
3. Gateway communities appreciation of the elimination that the new rock truck traffic has caused by the ranch resource closure;
4. Increased visitor enjoyment by limiting truck traffic;
5. Demonstrated PRNS / PRSRA member collaborative management;
6. Reduced injury to, and thus more humane treatment of, livestock;

7. Reduced potential for introduction of exotic invasive weed seeds with rock delivered from outside the project area;
8. Better access for PRNS staff that continuously use ranch roads maintained by ranchers;
9. Improved rancher ability to meet the requirement in their current SUPs to maintain the ranch roads;
10. Reduced PRNS carbon footprint; and,
11. Increased viability of the seashore ranchers.

Corr. ID: 3093

Representative Quote: We also need to be able to mine gravel again.

AL200 - Alternatives: Elk Management

Concern ID: 51853

CONCERN STATEMENT: Several commenters stated they would like the elk to be allowed to stay in their historic range and to be protected within the park. Further, ranchers should coexist with the elk in the pastoral zone, and the management of a healthy tule elk population should be the priority. Commenters in support of the tule elk population also expressed support for the continued restoration and expansion of a free-ranging tule elk population within the park and within the pastoral zone.

Representative Quote(s):

Corr. ID: 9

Representative Quote: Expand the Range of the Tule Elk Herd- Currently the Tule Elk are fenced into a narrow reserve on Tomales Point and a few other limited areas outside of the reserve. The public should be able view Tule Elk herds on their traditional grazing lands in the PRNS in areas currently occupied by cattle. Ranching may have played a historical role, but Tule Elk were the original grazing herds and should be allowed to expand into currently restricted areas. Ranching should be limited in order that grazing lands currently off limits to the public and Tule Elk may revert to a more natural state.

Visitors have ample opportunities to view cattle operations in neighboring Marin and Sonoma Counties. They have only limited opportunities to view Tule Elk in the PRNS. The NPS should take steps to increase the range of the Tule Elk herds in the current Pastoral Lands.

Corr. ID: 867

Organization: Center for Biological Diversity

Representative Quote: The NPS has and should continue to prioritize recovery of elk and other native wildlife in PRNS. Despite lobbying by a vocal minority to remove or cull the free-ranging elk herd at PRNS, the NPS should facilitate a peaceful co-existence between wildlife and the commercial lease/permit holders. The public which owns the land at PRNS does not support the removal from the pastoral zone or any cull of the free-ranging elk herd.

Corr. ID: 938

Organization: The Wildlife Trust

Representative Quote: 5. Co-existence between livestock and tule elk until commercial livestock leases/permits are discontinued:

Much is made by today's PRNS commercial leasees and permittees of the "historic" cattle grazing that has taken place on the Pt. Reyes peninsula over the last couple of hundred years. However, it must be understood that the real historic grazers in this area and over much of the rest of California are tule elk, along with deer and pronghorn antelope. For at least 10,000 years, even before the Coast Miwok arrived, tule elk have grazed the grasslands of California, including the coastal prairies and brush-fields of what has become Pt. Reyes National Seashore thousands of years later. This historic grazing by tule elk has been constant except for the relatively short period in the 1800s and 1900s, when market hunters and ranchers eliminated them from the most of California, including along the Coast.

Corr. ID: 1015 **Organization:** Tule Elk foundation

Representative Quote: It should be the long-term vision of the PRNS and the NPS to establish free-roaming Tule Elk herds throughout the park as an example of long-term sustainable and restoration ecology practices for restoring and maintaining the natural landscape as a "textbook example" for present and future students and the public as was envisioned by the next generation of leaders and stakeholders.

Free-roaming Tule Elk herds will bring more visitors to the PRNS than sustainable dairy/grazing practices. The public needs to see a restored and "natural" landscape within their parks including PRNS. Schools, colleges, universities and the public can participate in the long-term practices of restoring the landscape to support native species historically found as a part of California's new Common Core Standards and newly established disciplines in the Environmental Sciences, Natural Sciences, Ecosystem Management Studies and the Wildlife Sciences. A new vision for Ecotourism can emerge from this effort where millions of visitors each year (as well as students) can view a natural landscape that exemplifies the best of our National Parks.

Point Reyes National Seashore will become the model for a park in transition from past practices which resulted in a moderately degraded landscape integrated with stands of the native landscape to a fully restored native landscape that embraces using native umbrella species, such as Tule Elk, in the restoration process. The next step being the restoration of the historical native grassland and other historical communities found currently or historically in the park boundaries.

Corr. ID: 1015 **Organization:** Tule Elk foundation

Representative Quote: The Tule Elk Foundation (TEF) insists that Tule Elk remain the top priority in Pt Reyes National Park- specifically as free-roaming herds- which are an integral component of the "core" mission of the National Park Service! Free-roaming Tule Elk herds throughout the Pt Reyes National Seashore (including the pastoral lands) must take priority over any other "uses" of these federal restricted-use lands. A reminder that a National Parks are not considered "multiple use" lands - as are National Forests and other

federal lands managed under the Department of Agriculture. National Parks are to be managed "unimpaired for present and future generations" and restore and protect the ecological processes and natural systems.

Corr. ID: 1015

Organization: Tule Elk foundation

Representative Quote: What do you think the NPS should be considering as it develop this Ranch CMP?

Tule Elk Foundation (TEF) Response: We believe that the Pt Reyes National Seashore should adhere to its published statement cited from the Pt Reyes National Seashore Website: "Further conservation efforts (of Tule Elk) resulted in an additional free-ranging herd being established at Point Reyes. In 1998, 28 animals taken from the Tomales Point preserve were released in the wilderness area south of Limantour Beach. Reintroduction of Tule elk to the National Seashore and the further establishment of the free-ranging herd has been an important component of the restoration of the natural systems historically found in this unique and treasured place."

([http://www.nps.gov/pore/naturescience/tule elk.htm](http://www.nps.gov/pore/naturescience/tule%20elk.htm))

Based on the National Park mission and your documented efforts to restore free-roaming Tule Elk in the Point Reyes National Seashore (PRNS), the TEF recommends that the #1 priority in PRNS needs to remain the preservation and restoration of native, free-roaming Tule Elk (and other wildlife) including the pastoral lands. The continuing restoration of the Tule Elk, a native endemic herbivore, will further the mission of restoring the native landscape including native perennial bunchgrasses and other native plants that co-evolved with Tule Elk. Tule Elk, as an umbrella species, will be integral in the long-term restoration of the native landscape. Its presence will also benefit the restoration of other native animal species which have been degraded and/or lost in these historic sites as a result of grazing/browsing by non-native European cattle and the eventual establishment of many exotics throughout this park.

Corr. ID: 2989

Representative Quote: I believe every effort should made to support both herds of Tule Elk within the Park. They play an important role in the ecology and natural history of Point Reyes. I also believe that no agricultural changes be made that would adversely effect the elk or any other native species that live within the park.

Concern ID:

51854

CONCERN STATEMENT:

Several commenters suggested the use of immunocontraception as the appropriate tool for the management of the tule elk population within the park because it is cost-effective and has been used in the past, including at the park and at other locations. One commenter also pointed out that lethal controls may result in increased reproduction rates.

Representative Quote(s):

Corr. ID: 2936

Organization: The Humane Society of the United States

Representative Quote: The PZP vaccines used at other NPS sites require annual boosters to be effective, but significant progress has been made since

2002 on multi-year single shot PZP vaccines. Furthermore, new information about the efficacy of contraceptive approaches on cervid populations is available (Patton et al. 2007, Rutberg and Naugle 2008, Rutberg et al. 2013). The effects of the vaccine are reversible after three years of treatment, and no adverse health effects have been apparent among treated animals or among young they carried at the time of treatment.

Corr. ID: 2936

Organization: The Humane Society of the United States

Representative Quote: If some form of population control is undertaken, work at Point Reyes with the immunocontraception vaccine porcine zona pellucida (PZP) has shown that reproductive control is a viable option and could be implemented (Shideler et al. 2002). Past and recent field studies have now shown that management of cervid populations with PZP can be achieved (Rutberg et al. 2013, Naugle et al. 2002, Rutberg and Naugle 2008). Fire Island, including the National Seashore of the same name, is a 22.5 km² island in New York. Native white-tailed deer are found in abundance on the island and a hunt to control population size was stopped by public outcry and a lawsuit (Rutberg and Naugle 2008). A program of immunocontraception with PZP was initiated. Deer were not marked or tagged and all vaccines were delivered remotely using darts (Rutberg and Naugle 2008). The darts contained a dye to mark the deer to help avoid retreatment. In the most closely monitored portion of the island, the deer population decreased 10-11% p year during the program. These population studies were conducted by an independent entity, the Biological Resources Division of the U. S. Geological Survey, of the U.S. Department of the Interior. Similar population declines were obtained in smaller areas where white-tailed deer were treated with PZP (Rutberg et al. 2004).

Corr. ID: 2936

Organization: The Humane Society of the United States

Representative Quote: A study and several ongoing research projects have demonstrated that surgical sterilization is a feasible and potentially efficient way to manage cervid populations. For example, from 2002-2005, the city of Highland Park, Illinois, conducted a trap - sterilize - release program on the city's deer (Matthews 2005). In that study, does were sterilized through tubal ligation so they were not susceptible to the behavioral alterations typical of methodologies that halt hormone production. This methodology was both safe and humane and resulted in very low mortality rates due to surgery. Computer models of surgical sterilization from this and other research revealed that areas can maintain their deer populations at target densities by sterilizing 32 percent of the does per year (Porter 2004).

Also, recently, two surgical sterilization projects were conducted in two different communities in the U.S. In December 2012, the village of Cayuga Heights, New York, hired a contractor to capture, surgically sterilize via ovariectomies, and release 137 does - more than 90 percent of the village's deer population (Anon 2013a). In January 2013, the same contractor began a surgical sterilization project on a herd of approximately 170 deer living in a retirement community near San Jose known as the Villages (Anon 2013b) and the same contractor is currently conducting sterilization operations in Fairfax

City, Virginia and Baltimore County, Maryland. Based upon these findings, surgical sterilization may be a viable option for tule elk management at Point Reyes.

Corr. ID: 2936

Organization: The Humane Society of the United States

Representative Quote: It should also be noted that while PZP and other reproductive control agents and procedures have been shown to effectively reduce fertility, lethal control may sometimes have the opposite effect. It has been shown that the reproductive rate of cervids is greatly reduced at high population densities while cervids in areas subjected to periodic lethal removal have enhanced fertility rates resulting in increased population growth to compensate for harvested animals (Swihart et al. 1998). Further research also indicates that lethal removal of both sexes does nothing to stop fluctuations in cervid populations due to forage competition and natural mortality as a result of severe winter weather (Patterson and Power 2002).

Contraception is superior to lethal control in that it leaves animals in a population as placeholders that are reproductively dead ends yet continue to occupy consistent home ranges and exhibit natural herding behaviors. The presence of these adult placeholders ensures continuity in the social framework of the herd while limiting the number of young and more mobile animals that might pose increased risks of dispersal to ranches.

Based upon available research, NPS must seriously evaluate the usefulness of fertility control to stabilize and reduce the tule elk population density at Point Reyes if population reduction becomes necessary. It behooves the NPS to closely examine these options especially in light of the social and political controversy that surrounds lethal management.

Corr. ID: 3064

Organization: In Defense of Animals

Representative Quote: There is no need for "relocation" or any other type of "removal" of tule elk, nor should any hazing operations" occur to push tule elk from "ranch lands." Should the need arise to reduce the tule elk population at some point, no lethal methods may be employed. Instead, cost-efficient and effective immunocontraception should be implemented as was done successfully between 1998 and 2000, when the project was headed up by the late Susan Shideler with UC-Davis. During those three years, success rates in reducing elk reproduction was 96% in the first year, 84% in the second, and 91% in the third year. The results of this trial were published in a highly respected scientific journal. (Shideler et al. 2002. Use of porcine zona pellucida (PZP) vaccine as a contraceptive agent in free-ranging tule elk (*Cervus elaphus nannodes*). *Reproduction* (Suppl. 60): 169-176.)

Another example of a highly successful PZP project is the management of bison on Catalina Island, CA. Immunocontraception is a cost-effective, humane, and efficient management method.

Concern ID:
CONCERN

51855

[Commenters provided a variety of reasons as to why conflicts between the elk](#)

STATEMENT:

and ranching activities need to be managed, including: challenges in meeting organic certification requirements, decreased availability of natural resources, interaction issues between cattle and elk, transmission of disease, damage to ranch infrastructure, competition for forage, compounding impacts due to drought conditions (which justifies immediate action), and impacts to cultural resources. Commenters would like assessments of these impacts to be included in the Ranch CMP.

Several management methods for elk were suggested, including: relocation out of the pastoral zone, management of wilderness habitat, building and/or reinforcing fencing between the pastoral zone and the wilderness, compensating ranchers for elk damage and losses of forage, sterilization, hunting and distribution of meat, euthanizing of diseased elk, use of natural controls (starvation, disease, predation, etc.), reintroduction of predators, use of supplemental water resources to lure the elk, hazing, use of lease money to employ elk wranglers, increased staff for elk management, and reduction of herd size. Commenters would like cost/benefit assessments of these actions.

**Representative
Quote(s):**

Corr. ID: 16

Representative Quote: 1. provide supplemental feed to replace the pasture consumed by the elk.

Corr. ID: 28

Representative Quote: -More manpower in the field to manage the current herd of elk - all the herds. Get out of the office, into the field.

Corr. ID: 35

Representative Quote: -Why not continue hazing efforts? They seem to be effective.

-More hazing, more reinforcement, leads to elk trained to stay out of where they don't belong. Use some of lease-money to hire additional elk wranglers?

Corr. ID: 939

Representative Quote: At a meeting at the Dance Palace last month, I heard that the elk herd might be too large given that there are no natural predators. If that's so, then action should be taken to reduce the size of the herd.

Corr. ID: 1026

Representative Quote: - Reimburse ranchers for any and all damage by the elk to fencing and other infrastructure

Corr. ID: 2933

Representative Quote: Elk populations in Yellowstone Park have become healthy due to the reintroduction of wolves which also put pressure on the herds to stay out of the riparian habitats. In the long term, especially if wolves become a threatened species in California (which could well happen within 20 years due to breeding in Oregon), PORE would be an excellent place for a reintroduction plan. Ranchers could be compensated for any cattle losses which might occur. This IS a reasonably foreseeable action, based on the

success of other such reintroductions.

Corr. ID: 2936

Representative Quote: Tule elk are an important part of the ecosystems they occupied before extirpation by humans, and upon return they have entered into highly dynamic interactions with ecosystem components and ranch operations. The Ranch CMP/EA should evaluate the potential effect of natural disease as a population control mechanism and predation as a factor influencing survivorship before determining the need for steps to control population numbers.

Corr. ID: 2988

Representative Quote: Tule elk - The Ranch RMP should be explicit that the tule elk need management, including this reasoning: elk numbers on ranch lands can be expected to increase without management; if elk numbers increase, the elk will reach the level of unacceptable impact (and may have already) on the Seashores largest cultural resource and will likely result in impairment of that resource in the absence of management. Under NPS Management Policies 2006, unacceptable impacts are to be avoided and impairment is prohibited (see sections 1.4.1 through 1.4.7.2 <http://www.nps.gov/policy/mp2006.pdf>). The plan should specify any examples of where elk and agriculture co-exist successfully and explain what factors are responsible for that success (e.g., hunting, reimbursement for damages, etc). Given the realities of limited resources of the Seashore now and in the foreseeable future, it should be a high priority that the preferred alternative require as small a demand for ongoing management as possible. (The Seashores long and problematic history with intermittent culling of fallow and axis deer is instructive in this regard.)

Corr. ID: 3003

Organization: WildCare

Representative Quote: WildCare recommends that NPS continue to explore the provision of supplemental water intended to draw elk away from the ranches. In comparison to any proposed population management plan, non-lethal or otherwise, we also urge NPS to include a cost-benefit analysis of repairing and reinforcing fencing on the affected ranches. Appropriate fencing would prohibit Tule Elk from accessing the available food and water on the leased properties. Repair of fences would most likely be less expensive and is much less invasive than lethal control and we are prepared to ask our 20,000 stakeholders to weigh in on this issue if necessary.

Corr. ID: 3089

Representative Quote: That all the free roaming Elk now on the south Pastoral (agriculture) Zone be humanely removed off this Zone and returned to the Wilderness Area (Limantour).
that any diseased Elk at the same time be euthanized.
that this Wilderness Area (Limantour) for ELK be appropriately fenced as iat
Pierce Point. that Elk within this area be carefully monitored and taken care of
so that they do not suffer from lack of water and food as the Elk located at
Pierce Point. That herd is now very Small. .

that any new Park Staff be advised of the history within the last ten years of problems caused by the ELK in the Pastoral Zone. This also would be a reminder for present Park Staff to understand how hard it is for the caretakers of the Pastoral Zone to meet their commitments to organic specifications because of the ELK encroachment, drought, high cost of feed, etc.. Park Staff knows about the lack of food in the world and should be more accepting of, and helpful to the agricultural community that is under their jurisdiction.

Corr. ID: 3091 **Organization:** Western United Dairymen
Representative Quote: Removal of tule elk from the pastoral zone, including attention to development and management of wildlife habitat to encourage elk to be successful in the wildlife zone.

Concern ID:
CONCERN
STATEMENT:

51856
Some commenters stated that fencing would allow for coexistence of cattle and elk in the pastoral zone, indicating that fences should be constructed to contain cattle while allowing free movement of elk. These commenters indicated that the Ranch CMP should include a program to help ranchers install, monitor, and maintain these fences.

Other commenters stated that the use of fencing to separate the pastoral zone from the wilderness would not be effective because tule elk will find ways around fencing to inhabit their historic range.

Representative
Quote(s):

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: There are management options for PRNS to minimize rancher conflicts with elk, including fencing that allows for free movement of elk while containing cattle. Appropriate fencing will allow free-ranging elk to move without knocking down fencing, also preventing trespass cattle from leaving the pastoral zone. The CRMP should develop a program to help lease/permit holders to install, monitor and maintain fencing.

Corr. ID: 938 **Organization:** The Wildlife Trust
Representative Quote: 5d. Fencing for Co-existence: There are many types and styles of fencing developed that allow elk to jump over, and yet prevent cattle from getting out. Employing more of these co-existence type fences in strategic locations will keep allowing for the relative free movement of elk within the Pastoral Zone and help prevent fence damage and repair expenses at the same time.

Corr. ID: 3040 **Organization:** National Parks Conservation Association
Representative Quote: Tule Elk: The Seashore is the only national park with a native population of Tule elk, and it is important to remember that the elk, just like seals and whales, are an important part of the ecosystem. Tule elk have been prevalent in the Bay Area and Marin for thousands of years, and long before their extirpation in the 19th century. The public loves to see the elk on D Ranch while driving to and from Drakes Beach, and complete removal of the elk from the Outer Point seems impracticable. Certainly, the

drought conditions the past two years have exacerbated the conflict between Tule elk browsing their historic range at the Outer Point and dairy cows grazing. EAC is doubtful that a fence along the border of the Philip Burton Wilderness Area will keep the elk from returning to the Outer Point; the elk are at the Outer Point because that was part of their historic range.

Corr. ID: 3055

Representative Quote: A fence: The idea of a fence separating the pastoral zone from wilderness/natural areas is neither practical nor appropriate for the park. Such a fence would presumably run north-south from Limantour Estero to somewhere near Ottinger's Hill. Both ends would be problematic; neither could effectively contain the elk. The southern end would have to extend way out into the Estero- - a fully designated Wilderness area that plainly forbids such constructs- - and would still probably not keep determined elk from simply swimming or wading around. The northern end is equally problematic. There is no natural or engineered barrier to keep the elk from simply walking around the end of the fence.

Concern ID:
CONCERN
STATEMENT:

51857

Commenters indicated that a long-term elk management approach is needed immediately and should involve implementation of the 1998 Elk Management Plan, which the park has the authority to implement, to ensure the continuation of agriculture in the park. This plan does not authorize the movement of elk beyond the designated elk range. Further, commenters noted that all necessary analysis was completed for the 1998 management plan, and management, including compensation to ranchers for damages, should begin immediately.

Representative
Quote(s):

Corr. ID: 2775

Representative Quote: Establish long-term management approach for tule elk affecting agricultural lease/permit areas; This should involve the implementation of the 1998 elk management plan and EA. This is imperative for the survival of agriculture at PRNS and must include sustaining agriculture throughout the Pastoral Zone and removal of all tule elk from the Pastoral Zone.

Evaluate management approaches that improve maintenance of ranch operations and protect native wildlife and vegetation populations; identify collaborative management opportunities that promote protection of sensitive and rare cultural and natural resources through adaptation of ranch and PRNS management activities; This laudable objective must engage both agriculture and PRNS in in-depth exploration of the possibilities for collaboration through a creative, adaptive ecological and agroecological approach to resource management both within and beyond the Pastoral Zone.

Corr. ID: 3032

Organization: California Cattlemen's Association

Representative Quote: As emphasized above, NPS has the authority under the 1998 Elk Management Plan to remove tule elk from the pastoral zone

today. We encourage NPS to take action to do so immediately. If NPS nevertheless defers action on tule elk in the pastoral zone until after the new CMP/EA is completed, we urge that this be made a top priority of the CMP/EA.

The destruction tule elk have caused on PRNS ranches is devastating and well-documented. In particular, the elk regularly compete with cattle for forage, and have been known to damage fences and other ranch property during such incursions. The Limantour elk make daily incursions upon the Home Ranch and graze grasslands which are leased by NPS for cattle grazing. Likewise, the lessees of C Ranch have seen repeated loss of pasture as a result of elk living on what used to be the D Ranch. As tule elk require 10-15 pounds of forage a day, such incursions represent a significant strain on the resources required by these ranchers.

Corr. ID: 3063

Representative Quote: I am also aware that the 1998 tule elk management plan authorized PRNS to transfer the elk from Tomales Point to the designated elk range in the Limantour wilderness, not the D Ranch or anywhere else in the pastoral zone. The plan says that the elk may free range within the designated elk range. It does not authorize the movement of elk beyond the designated elk range. I am aware of growing public opinion that the elk should be removed from the pastoral zone and returned to the designated elk range so that elk don't continue to ruin my neighbors' businesses. I agree and expect that to be the outcome of this process.

Concern ID:
CONCERN
STATEMENT:

51858

Commenters indicated that management of the tule elk is needed as a result of issues pertaining to Johne's disease. One commenter suggested that the NPS assess the presence and transmission capacity of Johne's disease in wildlife and livestock, and stated that relocation of elk is not an option within the park due to the presence of disease. Therefore, elk must be harvested or moved to sufficiently remote locations to avoid spread of disease. Another commenter requested that the plan describe the history of Johne's disease in the park, how it is tested for, and how it is managed.

Representative
Quote(s):

Corr. ID: 28

Representative Quote: -How do you test for Johnes Disease & how long does it take for result?

Corr. ID: 28

Representative Quote: -Remove elk herd now due to Johnes Disease concern - including cross-species transmission & human health.

Corr. ID: 1010

Representative Quote: Johne's Disease. The Park Service should discuss the extent to which this disease occurs in the park, the cause or causes of it, including whether it existed in the park before the introduction of elk, and

how the Park Service intends to reduce and, ultimately, eliminate it to the extent feasible.

Corr. ID: 1490

Representative Quote: Game Farms for elk are hopefully coming to an end in Montana. If you want problems with diseases like CWD...Chronic Wasting Disease, that's where you will find it. Elk, like any other wild animal, is not meant to be held captive.

By their nomadic ways, they avoid predators, over grazing, and disease.

If they have brucellosis, it is because it was GIVEN to them by coming in contact with cattle.

Corr. ID: 2775

Representative Quote: The activities listed in this section underscore PRNS failure to recognize the tule elk crisis as a crisis, and the ineffectiveness of NPS response to that crisis. Monitoring an unfolding disaster, repeated repair of damaged fences, ongoing ineffective hazing of elk, and planned future epidemiological studies do not constitute management and certainly not effective management in the context of the real and existing threat to current and historical land uses at Point Reyes. The single greatest cause of mortality of elk at PRNS is malnutrition. This is hardly a glowing testament to the quality of either elk management, or ecosystem management, at PRNS. The PRNS elk herd was known to carry Johnes disease at the time these animals were released from their Pierce Point enclosure; elk were released despite the explicit recommendation that elk not be released where contact with livestock could occur (Cook et al 1997). Further epidemiological study is warranted, but is not needed to justify removal of elk from the Pastoral Zone, where their continued presence effectively constitutes biological warfare against the PRNS ranching community and the ecological integrity of the Pastoral Zone. If, as California Department of Fish and Wildlife has said, relocation of adult elk within PRNS is not a viable option, these animals must be harvested for regional foodbanks or relocated to a site sufficiently remote from PRNS to preclude their self-volitional return.

Corr. ID: 2986

Organization: Marin Humane Society

Representative Quote: Disease and morbidity rates of the Tule Elk should be examined by a scientific panel of experts. The health and well-being of this herd should be a high priority, especially since Marin County residents and visitors to the Park are sensitive to animal issues. Additionally, livestock shouldn't fall victim to diseases spread by the elk and likewise the elk should be protected from the livestock residing in the Seashore.

Concern ID:

51859

**CONCERN
STATEMENT:**

Several commenters advocated for lethal management such as hunting to be used as a means to control the elk population in the pastoral zone. Specific suggestions included: hunt only elk that are causing damage, conduct limited hunts with ranchers selling tags and putting profits toward infrastructure repair or habitat restoration, sell meat as a local food source, and donate meat

*Representative
Quote(s):*

to soup kitchens.

Corr. ID: 10

Representative Quote: For those animals that have escaped and are truly causing provable damage, they could be hunted in a controlled hunt. For those animals that are not causing damage such as the Limantour herd, leave them alone

Corr. ID: 32

Representative Quote: Consider hunting the elk.

Ranchers could sell a bull elk tag for at least 5000.00/a piece. 10 Elk = minimum of 50,000 -. This money could be put to a habitat restoration/wilderness project.

Corr. ID: 32

Representative Quote: We now have a local slaughterhouse. Consider the value of local, wild raised elk, locally slaughtered - steaks & sausage - yum! People would support it.

Corr. ID: 33

Representative Quote: To keep the numbers down maybe culling now and again for soup kitchens or individuals with special hunting licenses to share with the communities here in West Marin and beyond.

Corr. ID: 3031

Representative Quote: It seems a little impossible to have an unmanaged elk herd on a managed landscape. The park needs to bridge the gap between the needs of wildlife and viable ranching and the solution is really not that difficult. In the absence of natural predators, any deer or elk population needs hunters to keep the population in check. Without hunting, the elk population will grow indefinitely until it has saturated the habitat. Introducing limited hunting now, while the elk population is still small, would give the park a chance to maintain wild elk and provide the ranchers a way for the elk to be beneficial without the herd becoming so huge that it overtakes the pastures. Allow ranchers to either sell hunting tags, and thereby generate thousands of dollars of income to offset damage the elk may be causing to their infrastructure, or periodically shoot one themselves for food and two things are accomplished. One: the elk become a positive or at least less of a negative, and two: hunted populations move more. Shoot an elk once in a while and they aren't going to spend as much time in one location any more.

Do not readily discount hunting elk as an option. There are other parks and preserves in the NPS that allow hunting. This is just a matter of regulation. It may not be in your management guidelines now, but you can write it in. Ask your lawyers. I'm sure they can write up the language for you.

Safety doesn't have to be an issue. Specific areas at specific times could be outlined for the hunts. Again, other parks manage to do it.

Concern ID: 51860
CONCERN STATEMENT: One commenter indicated that long-term hunting of elk should not be a management option because the park would be committing to management activities that may not be reflective of the elk population at a given point in time.

Representative Quote(s): **Corr. ID:** 1743
Representative Quote: Please don't extend hunting permits. Allow the Elk population to recover, do not commit yourself to granting long term hunting rights which may not reflect what the size of the population can stand.

Concern ID: 51862
CONCERN STATEMENT: Several commenters stated that only non-lethal and humane methods should be considered in the management of the tule elk population and provided detailed justification for the importance of using ethical management methods. Methods suggested include: fencing, exclosures, hazing, reproductive controls, Commenters indicated that only non-lethal management would be socially acceptable and supported by the public. Other commenters further advocated for no harm in management, including no harassment or destruction of resources.

Representative Quote(s): **Corr. ID:** 1015 **Organization:** Tule Elk foundation
Representative Quote: Any cultural and/or natural artifacts and resources including native species are the priority of the National Park lands and should be protected to the fullest extent as an integral component of the NPS mission. No harassment, destruction or take of these cultural and natural resources (including Tule Elk and all native species) shall be allowed at any time. Any operations and/or activities that impact these cultural and natural resources should be phased out over time and eventually eliminated as a part of park activities.

Restoration of the harmony between the humans and native species found in a National Park should be a core objective and serve as a model.

Corr. ID: 2936 **Organization:** The Humane Society of the United States

Representative Quote: We understand the National Park Services (NPS) may have concerns over the potential adverse impacts caused by tule elk (*Cervus canadensis nannodes*) on ranches in the Park. The HSUS maintains that lethal control is neither a socially acceptable practice nor, in the long-term, the most ecologically sound approach to resolving conflicts with wild animals such as elk. Instead, we endorse the strategic use of fencing, exclosures, and hazing to immediately reduce damage attributed to elk to acceptable levels and, if it becomes necessary to gradually reduce and stabilize the elk population, using reproductive controls.

Corr. ID: 2936 **Organization:** The Humane Society of the United States

Representative Quote: Give attention to humaneness, its relevance to the public, and the consequences of actions for the welfare of wild animals in the

Ranch CMP/EA beyond merely considering the American Veterinary Medical Association (AVMA) guidelines for euthanasia. Beyond the discussion of humaneness in euthanasia techniques lies a broader issue regarding the ethical and moral basis of management actions themselves. The concept of unnecessary death is a relevant and significant issue any time lethal control of wild animals is proposed. Ethical concerns regarding how we treat wild animals, and why we do so, should be addressed and recognized as a first order concern.

Killing should be avoided unless compelling justification (immediate threat to human health and safety, for example, if such action has been shown to reduce the threat) for actions exists. Furthermore, lethal control of animals without action to prevent recurrence of problems is unacceptably shortsighted and inappropriate. Time and economic concerns are irrelevant in a discussion of humaneness, unnecessary death, and other welfare consequences. An action is not more or less necessary or humane because it is more or less time-consuming, more or less technically feasible, and/or more or less costly. If after such a full examination of the issues, NPS decides to implement a less humane but less time-consuming, easier, and/or less costly alternative, it must clearly characterize that choice for the public and the decision maker. The NPS must acknowledge the concepts of humaneness and ethical issues including unnecessary death, as a significant part of the public's interest in NPS management of Point Reyes.

Corr. ID: 3003 **Organization:** WildCare

Representative Quote: One of the first steps of an Environmental Assessment is to determine the extent of the perceived problem. If it is deemed that the population of Tule Elk needs to be managed, and that National Park Service (NPS) will be responsible to fund, coordinate and carry out those plans, we encourage the identification and employment of non-lethal management of the small population of free-roaming Tule Elk who have moved into the pastoral zone at the Point Reyes National Seashore. Non-lethal management of this treasured native species is socially acceptable and will be supported by the public.

Concern ID:
CONCERN
STATEMENT:

51866
Commenters provided examples of specific wildlife management plans to provide guidance in the development of management of the tule elk population. Specific examples included: management of elephants at Kruger National Park in South Africa and management of tule elk by the California Department of Fish and Wildlife and the California National Guard.

Representative
Quote(s):

Corr. ID: 1018
Representative Quote: With regard to elk management: I recommend that you investigate how other public agencies with elk on their lands are dealing with conflicts between elk and adjacent ranchers. For example, I believe that the California National Guard actually maintains one or more alfalfa plots at Camp Roberts to "encourage" its elk to stay on military lands and not stray onto adjacent agricultural property.

Corr. ID: 3022

Organization: University of California
Cooperative Extension

Representative Quote: Management of Tule Elk. The California Department of Fish and Wildlife (DFW) is the agency with primary responsibility for managing tule elk in California. As of 2007, DFW oversaw management of approximately 21 herds of tule elk with numbers estimated at about 3,800 on private lands. Elk relocation efforts have long been documented to cause financial harm to agricultural operations. We suggest that PRNS become familiar with the historic elk management efforts to DFW, rather than repeating past mistakes that have caused tremendous damage to agricultural areas in California and inhumane conditions for elk:

<http://www.dfg.ca.gov/wildlife/hunting/elk/tule/about/distribution.html>

Organization: University of California

Corr. ID: 3023

Cooperative Extension

Representative Quote: Paramount to the success of the plan is the Park Service taking a thoughtful approach to reduce the conflict between the introduced elk herd and the park's historic ranches and dairies. In order to protect the Park's natural and historical resources, the elk herd must be managed. Lack of management is currently putting the Park's resources at risk. Management strategies such as culling the herd and/or controlling the location of herd with fencing are imperative. The elk herd should be managed within the carrying capacity of the "wilderness lands", yet the Park Service seems unwilling or unable to address this issue. I would encourage the Park Service to look at other park systems that manage mega fauna for assistance on process and method. For example, Kruger National Park in South Africa manages an elephant herd. The location of the elephants is controlled with fencing and elephants are culled when their numbers exceed carrying capacity.

Corr. ID: 3049

Organization: Marin Audubon Society

Representative Quote: Discuss the CDFW experience managing elk. Have they used methods to contain the elk that could be useful here? Are there interim solutions or possible long-term measures from their experience that could be taken here?

Concern ID:

**CONCERN
STATEMENT:**

51867

Commenters would like to see tule elk herds recognized and managed as distinct herds with each managed for sustainability and balance between natural and cultural resources. One commenter suggested that the distinct herds should be managed by a third-party expert.

**Representative
Quote(s):**

Corr. ID: 22

Representative Quote: The three herds of tule elk should be recognized as distinct groups of existing native wildlife and should each be managed with distinct strategies that comply with park service values and existing park service management policies as defined in the 2006 management policy document

Corr. ID: 28

Representative Quote: -Elk need to be managed as a herd in designated areas by a third party with management experience.

Corr. ID: 3005

Representative Quote: manage elk herd for sustainability, recognizing each distinct herd as biologically significant, and interpret true ecology of elk-cattle interactions as provided for in park service mission, allowing a proper balance between natural and cultural resources

Concern ID:

**CONCERN
STATEMENT:**

51871

Commenters indicated that, particularly given unanticipated past events regarding the movement of the tule elk within the park, the Ranch CMP should include adaptive management measures.

**Representative
Quote(s):**

Corr. ID: 28

Representative Quote: -Make sure that any plan has an escape clause to react quickly in the event the plan isnt working (e.g., tule elk).

Corr. ID: 1039

Representative Quote: The intrusion of elk onto leased pasture at PRNS, which has resulted in significant cost and damage to ranching operations, is an urgent matter that could lead to the bankruptcy of ranchers before any new management plan is in place - a dire fact that the Park should be taking addressing right away. The Park has a moral and a legal obligation to be good landlords to these hardworking suppliers of good local food that we need for sustainability Indeed, the whole problem could have been avoided if the Park had not installed a second herd at Limantour. It is surprising that the Park did not anticipate their subsequent migration onto pastureland, and disturbing that they have done so little to mitigate that situation. Assertions that little can be done because it is not considered in the current management plan do not ring true to the ranchers or the public, so it is widely believed that the elk are a being used as a lever to force ranchers out of the Park. Public perception and the livelihood of the ranchers can both be rescued by immediately removing the intruding elk back to Tomales Point. Being that unforeseen situations often do come up and that this one can be mitigated so expediently without any damage to the elk, it would be easy for the Park to argue for immediate action regardless of the degree to which this situation is or isn't dealt with in the current management plan. Adaptive management is an eminently practical and fundamentally important tool in any management plan and any policy's implementation.

Concern ID:

**CONCERN
STATEMENT:**

**Representative
Quote(s):**

51875

One commenter suggested adjusting the ranch boundaries within the pastoral zone to allow elk to roam in their preferred areas.

Corr. ID: 867

Organization: Center for Biological Diversity

Representative Quote: The free-ranging tule elk at PRNS have migrated to preferred areas optimal for elk. The CRMP should adjust the boundaries of

the pastoral zone and lease/permit boundaries to minimize conflicts between ranchers and elk. Areas where the tule elk are not generally congregating and there are no other sensitive natural resources can be incorporated into lease/permit areas; and areas of preferential elk use can be removed from the pastoral zone, maintaining the acres under lease/permit and the forage quality.

Concern ID: 51877
CONCERN STATEMENT: One commenter expressed opposition to the use of hazing of the elk within the pastoral zone, indicating that it causes damage to ranch infrastructure and creates costs to taxpayers.

Representative Quote(s): **Corr. ID:** 3092 **Organization:** Point Reyes Seashore Ranchers Association
Representative Quote: PRSRA strongly opposes the current elk hazing by PRNS. This EA should evaluate the adverse effects to the elk, the ranchers fences, the ranchers water systems, the ranchers livestock and the continuous cost to the taxpayer to run elk in circles.

Concern ID: 51878
CONCERN STATEMENT: One commenter expressed concern about the creation of water resources within the park, stating that this action requires a public decision process. The commenter further indicated that the Ranch CMP must evaluate the benefits of habitat enhancement within the elk range and the adverse impacts that would continue to result from habitat enhancement within the pastoral zone.

Representative Quote(s): **Corr. ID:** 3092 **Organization:** Point Reyes Seashore Ranchers Association
Representative Quote: PRSRA strongly opposes the new PRNS efforts to enhance tule elk habitat within the pastoral zone. These PRNS efforts, including the creation of new water sources, are changing the use of an area within the pastoral zone, without the required public process necessary to make such dramatic changes. The PRNS has chosen to create an elk attractant within the pastoral zone meant to be used by the ranchers in the working landscapes, rather than improving the habitat in the designated elk range where the elk belong. This EA must not be used to validate improper management practices just because PRNS has unilaterally initiated those practices outside of, and in conflict with, the current elk management plan. This EA must fully evaluate the benefits of habitat enhancement within the elk range and the adverse effects to the project area if elk habitat enhancements continue within the ranch lands.

Concern ID: 52163
CONCERN STATEMENT: Commenters indicated that tule elk should be managed so that they do not occur in the pastoral zone. Some commenters further stated that the tule elk should be returned to the Limantour wilderness and that their population numbers should be managed to appropriately reflect the carrying capacity of the land.

Representative Quote(s): **Corr. ID:** 40
Representative Quote: Instead of spending taxpayer money on a planning process and the development of a new pastoral zone management plan that is

not needed, the NPS should redirect their efforts toward a common sense solution to the "elk problem":

Round up the elk and move them back to their Limantour wilderness home from which they escaped, and build a fence to keep them there. Manage them the way the elk are managed in the Pierce Point Wilderness in the PRNS, where a fence keeps them where they belong. Allow Mother Nature to take care of overpopulation problems (many elk died in Pierce Point last winter due to reduced forage resulting from drought, as is natural in a wilderness area where resource managers let nature take its course).

Corr. ID: 1009 **Organization:** Marin County Agricultural Commissioner

Representative Quote: Tule Elk are impacting ranchers because they have migrated beyond the fenced wilderness boundary area onto ranch land, competing for feed and water resources intended for livestock, disrupting operations, and increasing operating cost while potentially exposing the livestock to disease pathogens. Wilderness designated lands, and Pastoral/Ranch leased lands should be given equal protection corresponding to their intended use and purpose. Wilderness Areas are intended for displaying nature and Resources Specialist to manage whereas the Pastoral Areas are intended to be managed for agricultural use by the rancher. There should be little allowance for commingling resources use and management styles between them. When livestock are found in Wilderness, they are removed. Likewise, when Elk are found in Pastoral Zones they too should be removed: not really that complicated to manage. A quickly designed and implemented plan to move Elk back to Wilderness Zone is a priority of ranchers. There are approximately 70 Tule Elk that have migrated into the Pastoral Zone disrupting several ranching operations. Removing three (3) Elk a week and returning them to a fenced wilderness area would solve the problem in half a year. There are Park Biologists and ranchers that could manage the movement using great care to protect the Elk.

Corr. ID: 2579

Representative Quote: An equally high priority is that the Tule Elk must be actively managed, removed from the Pastoral Zone, and returned to the lands to which they were originally assigned, in numbers that reflect the carrying capacity of the land. The Park Service should commit to maintaining these animals to standards of health similar to certified organic livestock.

Corr. ID: 2718 **Organization:** UC Cooperative Extension

Representative Quote: Essential to the success of this planning process is reducing conflicts between the reintroduced elk herds and the parks historic ranches and dairies. The lack of management of the introduced elk herd has resulted in an over population of the species, decreased natural resources and critical impacts to both livestock and dairy producers. The growing numbers of unmanaged elk have taken up permanent residence on working ranches and dairies in the pastoral zone. They harass cattle and have the potential to spread cattle-borne diseases. They also damage fences and equipment, and

compete with cows for carefully managed organic forage on ranch lands. This is a serious problem for ranches now and will certainly lead to impairment of historic values of the working ranches. Tule elk ranging freely in the national seashores pastoral zone now pose an imminent threat to the viability of the very dairy ranches that the pastoral zone was created to protect. The NPS needs to implement strategies to ensure permanent, effective separation of the elk from the working ranches pastoral zone. The options include relocation of animals off the ranches, sterilization, and installation of elk fencing to prevent the Limantour herd from continuing to stray out of the wilderness area and into the pastoral zone.

Corr. ID: 2960 **Organization:** Marin Conservation League
Representative Quote: MCL believes that current drought conditions have added a measure of urgency to the Ranch Planning process as it pertains to the immediate problem of free roaming elk; that the park service has an ethical duty to take effective and immediate steps to separate the elk from the cattle on the ranches; and, at the same time, a duty to take humane steps to provide for, and manage the size of, the herd confined at Tomales Point.

AL300 - Alternatives: Other/New Alternatives or Elements

Concern ID: 51889

CONCERN STATEMENT: Commenters suggested several new alternatives and/or elements relating to ranching such as: showcasing ranchers' stewardship practices to the community; developing a historic ranch complex at Tomales Point; clearly defining "sustainable operational practices"; promoting agricultural tourism and ranching education; and providing incentives to decrease carbon emissions.

Representative Quote(s):

Corr. ID: 1015 **Organization:** Tule Elk foundation
Representative Quote: Clearly define "sustainable operational practices" listed in the Ranch CMP document. Again the priority should be to fully protect and restore the native landscape as the top priority and guiding principle.

Corr. ID: 1029 **Organization:** U.S. Congress
Representative Quote: This process should also provide a good opportunity for the ranchers to showcase stewardship practices to the community at large and educate them about the challenges facing small family ranchers, most of whom now operate organic ranches and farms.

Corr. ID: 1032
Representative Quote: Planning & Protection of Ranch Complexes:

There is an historic ranch complex at Tamales Point which should be developed to show the brief history of ranching at Point Reyes.

Corr. ID: 1254

Representative Quote: PRNS should promote agri-tourism and work with the ranching families to provide farm tours and ag-education. There are many organizations which may be willing to help including the Dairy Council of California, Cattlemen's Association, and the California Milk Advisory Board.

Corr. ID: 2775

Representative Quote: Coordinate and promote interpretation and education opportunities for visitors and the public to learn about historic and contemporary ranching operations; Such interpretation and education activities have been underway for nearly a decade at the Drakes Bay Oyster Farm and should be supported and expanded. This presents a unique opportunity for the general public to learn the role of agriculture in maintaining the PRNS landscape historically and currently, its collaborative role in the formation of the Seashore, and its current role in addressing natural resource management issues, including climate change.

Address visitor access and recreational opportunities on ranch lands to protect the interests of Seashore and ranch facilities (Facilities generally do not have interests; this might better read: protect the interests of the Seashore and ranches), while ensuring protection of ranch operations and their privacy. This laudable goal needs to be worked out collaboratively between PRNS and PRSRA and approved by each affected ranch.

Corr. ID: 3071

Organization: Historic B Ranch

Representative Quote: Raven Control-The park service needs to implement lethal raven control. Ravens eat feed from the cattle which costs money. The ravens are also detrimental to the Common Murre population. Lethal control of ravens should be used on the ranches most impacted ravens.

Organization: Point Reyes Seashore Ranchers Association

Corr. ID: 3076

Representative Quote: There is some potential for rangeland managers to be monetarily compensated for the carbon they sequester. PRNS should allow all credit and compensation to go to the seashore ranchers that have implemented this important BMP, should the opportunity arise in the future. PRNS should also consider compensating seashore ranchers, through rent reduction, for offsetting the PRNS carbon footprint. This ecosystem service provided by the seashore ranchers could allow PRNS to become the example of how a unit of the NPS can become carbon neutral, even carbon beneficial - an important part of a solution to climate change and ocean acidification.

BMPs have recently languished at PRNS during an approval process instead of being quickly authorized. One of the stumbling blocks is the unnecessary requirement imposed by PRNS to repeat a NEPA analysis that had already been accomplished by another federal agency. There is only one NEPA. Most of the BMP proposals brought to the PRNS by a PRSRA member have been designed and analyzed by NRCS. NRCS is a federal agency that has significant, long term experience with the project area. NRCS is authorized

and fully capable of completing appropriate and legally sufficient NEPA review. PRSRA suggests the new ranch CMP include a provision that PRNS will accept the NEPA review prepared by NRCS and the recommendations by NRCS on any BMP evaluated by NRCS. This agreement will result in:

- A more streamlined process;
- BMPs being implemented more quickly and more often;
- More natural resources protection;
- More experienced individuals analyzing BMPs and making decisions;
- More rancher willingness to initiate a less onerous process to do the right thing for the environment; and
- Less taxpayer dollars wasted by avoiding unnecessary, duplicative review.

Concern ID:
CONCERN
STATEMENT:

51891
Commenters suggested considering several new alternatives and/or elements relating to park management, park restoration, and visitor experience in the Ranch CMP, such as: creating a horse riding program for handicapped children; restoring the coastal prairie; increasing recreational opportunities, such as horseback riding, biking, and educational programs; prohibiting individual leaseholders from authorizing special events; increasing habitat for native wildlife; reintroducing extirpated species (black bears, pronghorn, and squirrels); reducing the presence of non-native vegetation; protecting and restoring streams and riparian habitat; and developing alternative energy sources in the park.

Representative
Quote(s):

Corr. ID: 7
Representative Quote: There could be a riding/horse care program aligned with the positive programs at Slide Ranch, and perhaps the two entities could fund-raise together. San Francisco's stables have closed, and I am certain that there would be demand for another facility in Marin. Handicapped children especially benefit from riding, and there are few opportunities for them or for veterans with disabilities.

Corr. ID: 28
Representative Quote: -The EA should consider, in a positive light, innovative energy sources, including small scale scale wind.

Corr. ID: 1032
Representative Quote: Recreational opportunities:

Hiking, horseback riding, nature studies, and natural history education that could be taught by rangers or teachers on field trips. Human history should emphasize the Miwok and 16th century arrival of Francis Drake (1579) and the wreck of the Manila Galleon, San Agustin in 1595).

Corr. ID: 1140 **Organization:** Environmental Action Committee of West Marin

Representative Quote: Event Rentals: All events should go through the Park headquarters special use permit process. Individual leaseholders should not have the authority to permit major special events.

Corr. ID: 2933

Representative Quote: One goal should be to provide expanded habitat for wildlife. While threatened species are important, there should also be emphasis on native plants and animals. The cattle operations have severely reduced native plant cover and thus many species are restricted. Bobcat, coyote, otter, cougar, and deer numbers should be much higher.

Corr. ID: 2933

Representative Quote: The long term plans should also consider reintroduction of other species which might have been extirpated since the mid-1800s; e.g. Black Bears and Pronghorn.

Corr. ID: 2993

Organization: Turtle Island Restoration Network

Representative Quote: We believe that NPS should place a high priority on protecting and restoring its streams and riparian habitat within the area affected by the proposed new Comprehensive Management Plan. In addition to threatened salmon and other fish species, California's riparian habitat harbors many species of birds, mammals, reptiles, and amphibians. It provides important breeding and overwintering grounds, migration stopover areas, and corridors for dispersal. Despite its importance, riparian habitat has been decimated over the past 150 years, and now covers only 2% to 15% of its historic range in California. The National Research Council (2002) concluded that riparian areas perform a disproportionate number of biological and physical functions on a unit area basis and that the restoration of riparian function along America's water bodies should be a national goal. Streams and riparian habitat within the area included in the proposed Plan should be protected with adequate, science-based setbacks to avoid erosion and loss of vegetation.

Corr. ID: 2998

Organization: Save Our Seashore

Representative Quote: 18. Ground squirrels should be reintroduced per the SUPs restoration of extirpated native species

Corr. ID: 3089

Representative Quote: That this Park Plan provide more and/or better accommodation such as picnic tables, trash containers, benches etc.. near parking areas for visitors, particularly elderly and disabled to use, allowing them to view the beach or whatever is featured at those area. The Park and the Community could hold a competition for items such as above, giving us a way to interact.

Concern ID:

51892

**CONCERN
STATEMENT:**

Commenters suggested that connectivity and accessibility should be improved within the park. Many commenters suggested specific areas where trails should be improved or developed within agricultural areas of the park.

**Representative
Quote(s):**

Corr. ID: 9

Representative Quote: Increase Public Access- Currently there are limited access points for the public to enjoy 28,000 acres of the Pastoral Lands in the Point Reyes National Seashore (PRNS). The limited number of trail heads and parking areas should be significantly expanded to encourage the public to explore the magnificent landscape and vistas along Drakes Bay, the Pacific Ocean and Tomales Bay.

For example, there is no trail connecting the Pierce Point Ranch to Marshall Beach and no coastal trail connecting Pierce Point Ranch to the Point Reyes Lighthouse. There is no trail connecting the Peter Behr overlook to the Chimney Rock parking area. While the southern half of the PRNS has a well developed trail system for public access and enjoyment, the pastoral zones do not. The limited access and trail system in place are not adequate for the growing number of visitors to the norther section of the PRNS.

Corr. ID: 2982

Representative Quote: Most of the open land in West Marin is private ranchland. Some is subject to non-development easements thanks to the Marin Agricultural Land Trust. Yet, as a rule, these lands are not open to public recreational use, specifically hiking. The National Park Service is in a unique position to coordinate multiple use of Seashore lands by both ranchers and hikers. It is reasonable to hope that whatever model develops from the Seashore's experience might be extended to other open lands nearby.

We have already seen a magnificent collaboration with the 0.9 mile section of the Estero Trail between the Drakes Head Trail and the White Gate Trail. That section replaced a boggy swale with a gradual traverse, complete with modest culverts, for a wonderful hiking experience, through the cattle. It would be wonderful to see a similar effort to rejoin the Muddy Hollow trail with the old road where it crosses Home Ranch Creek. Perhaps a bypass trail around the Home Ranch homestead would assure the rancher's privacy while allowing a through hiking route. And perhaps, like the new stretch of the Estero trail, the stretch along the east shore of Home Bay could be moved away from the cattle paths and become more hiker-friendly. Finally, it will be difficult to persuade ranchers to allow hikers across working pastoral lands unless hikers can be counted upon to respect the pastoral use of the land. This is the nub of what should be a major scoping issue and goal.

Corr. ID: 3000

Organization: Marin County Bicycle Coalition

Representative Quote: Four decades ago, a group of forward-thinking farmers blazed trails in Sonoma County, creating the Sonoma County Farm Trails map and guide for local agriculture, inviting the public to meet their farmers and learn more about the origins of their food. This successful program has helped ensure the preservation of Sonoma County's rich agricultural heritage. MCBC believes this successful model could help keep Marin's farm communities thriving through the combination of enhanced public access, education and economic opportunity.

We recommend that the plan consider the feasibility and benefits to the

park, ranchers and the heritage of Point Reyes of implementing a similar trail program for Marin's ranch lands. Pierce Point Road is an important access corridor from Inverness to Abbots Lagoon, Kehoe Beach and Pierce Point Ranch. However the only way to travel to any of these places is along a narrow road void of shoulders. It is unlikely that hikers, walkers or equestrians would access these popular destinations any other way than with an automobile. However, if a wide trail or ranch road were built parallel to the road, it would encourage more people to access these areas under their own power.

This would achieve a variety of benefits, including:

- Greater public access and an enhanced recreational experience
- Reduce the number of cars parked along the scenic roadway
- Reduce carbon emissions near the seashore
- Provide an alternative for slower moving ranch equipment such as tractors

Funding could come from grants, fundraising activities, private gifts and sources such as the Farm-to-market road and Ranch-to-market state and federal transportation funds currently available in other locations.

Corr. ID: 3000 **Organization:** Marin County Bicycle Coalition

Representative Quote: Connectivity

There are routes being used by park visitors that currently are not designated or maintained park trails. These include a cow trail connecting the town of Olema to Bolinas Ridge and the Jewell Trail, a fire road on the north east side of Mt. Barnaby that connects with Devil's Gulch, and a ranch road on the east side of Highway 1 near Five Brooks Stables that provides access to Bolinas Ridge. We recommend that the plan evaluate adding these crucial connector routes into the Park trail network.

Corr. ID: 3033 **Organization:** International Mountain Bicycling Association

Representative Quote: Connectivity would be greatly enhanced if the NPS improve and designate several trails that are currently being used by mountain bikers and other users. These include:

- A ranch road that starts on Highway 1, just north of Five Brooks Stables, and proceeds up to Bolinas Ridge. We have been informed that the National Seashore intends to improve that route. We urge that this be specifically discussed in the Ranch CMP.
- There is an informal cattle trail that proceeds from Olema to Bolinas Ridge, just north of Jewell Trail. This is a critical connector, and is frequently used by individuals who desire to avoid the very dangerous Sir Francis Drake Blvd. That trail must be improved and designated on maps.

We suggest that a new trail segment be constructed from the Estero Trail to the north end of the White Gate Trail. This would provide a much desired loop trail, and keep users from using the private road through Home Ranch. We also suggest a new segment of trail to connect the northern end of L Ranch Road with the Pierce Point Road. This would create another loop.

Access to the northern end of the Point Reyes National Seashore is provided by Pierce Point Road. This area has tremendous attractions for all users. These include Pierce Point Ranch, Abbotts Lagoon, the Kehoe Beach, and Tomales Point, which includes Bird Rock and Tomales Bluff, just across from Lawson's Landing and Sand Point. The only access to these spectacular areas is on Pierce Point Road, which is narrow, windy, and which has few shoulders. We urge the National Seashore to create a dirt road or wide trail that parallels Pierce Point Road, to provide a safe way for enthusiasts to access these places under their own power, while being protected from automobiles speeding on the road.

Concern ID:
CONCERN
STATEMENT:

51898
One commenter provided multiple suggestions for alternative elements, including: removing impoundment dams in former tidal areas; decommissioning unused ranch roads; utilizing ground-penetrating radar to identify old dump sites (and to remediate those old dump sites); assessing the feasibility of controlled burns in wilderness areas; posting maps of designated pastures and specific areas within the pastoral zone (such as riparian areas); posting information regarding range management guidelines as well as information on SUPs, ranch milestones, and FMV; banning dogs on paths in proximity to livestock; and removing fencing in public rights-of-way.

Representative
Quote(s):

Corr. ID: 2998 **Organization:** Save Our Seashore
Representative Quote: 10.Impoundment dams in former tidal areas should be removed
39.Use ground-penetrating radar to identify likely sites for old dump areas on ranchlands
40.Remediate old dump areas discovered on ranchlands
61.Assess possibility that controlled burns in wilderness can increase carrying capacity
74.Post map of designated pastures and GPS fence corners on Ag website
75.Post GPS maps of areas in pastoral zone but excluded (e.g. riparian areas, etc)
76.Post PRNS Range Management Handbook, Guidelines etc
77.Post Ag SUPs, Ranch Plans and monitoring of whether Ranch Plan milestones achieved
78.Post Ag Operation Fair Market Valuations (FMV)
85.Ban visitor dogs on paths in close proximity to livestock
89.Remove fencing in public right-of-ways

CC1000 - Consultation and Coordination: General Comments

Concern ID:
CONCERN
STATEMENT:

51909
Commenters suggested that several other agencies, entities, and stakeholders should be consulted with during preparation of the Ranch CMP, including the United States Department of Agriculture - Natural

Resources Conservation Services (NRCS), California Resources Agency, and Marin County Resources Conservation District (RCD), the Marin Humane Society, University of California Cooperative Extension (UCCE), the Point Reyes Seashore Ranchers Association, and the Marin County Agricultural Commissioner. Other stakeholders that should be consulted include agronomists, wildlife experts, environmental groups, and concerned citizens. One commenter emphasized that collaboration and partnership between the NPS and the ranchers in the park is essential to the planning process.

One commenter suggested topics that should be discussed by these parties in informal, trust-building working groups, including diversification of crops, rangeland improvements, invasive species, succession of rights, and elk management.

*Representative
Quote(s):*

Corr. ID: 29

Representative Quote: An inclusive process is key. I envision a series of conversations that, by design, bring parties with different interests and outlooks together. Participants could divide themselves into informal working groups of 7-10 people, each group focusing on a broad issue, and each group representing a diversity of experience and interests. Participants would have two goals: 1) develop personal trust with those "across the table," and 2) leverage that trust to reach consensus on a range of alternative approaches to the issues being discussed. Those issues could include the following as well as others:

1. Diversification: For example, permitting row crops. Necessary to define type and extent, addressing, for example, water supply, management practices and the diversification agreement, annual assessment, etc.
2. Rangeland improvement: specification of RDM (residual dry matter) values, assessment of soil characteristics, including slope of grazing lands, grazing monitoring programs, etc.
3. Invasive species, both flora and fauna: specify management practices, the impact on organic certification, etc.
4. Silage: high value, directly as feed source, indirectly in carbon sequestration. Assess suitability of site, limits on acreage, means of assessing impact, etc.
5. Succession of rights: should they be assigned to adjacent ranches, e.g., Horrick. Or should they be transferred to non-family producers? How is value assessed? How would lease sales be managed?
6. Elk management: assess full range of alternatives, including culling, which might have lower impact than other choices, but is politically difficult.

Corr. ID: 29

Representative Quote: Essential to developing a successful management plan is a process supported by broad participation: not just the obvious stakeholders- -the ranchers and the Park Service- -but agronomists, wildlife experts, various Ag groups, environmental groups and concerned citizens. Broad constructive engagement as a goal may be much more realistic than

the current disagreement suggests. Whatever our interests, we all presumably want the same outcome: continuing agricultural production on the NPS lands that is economically and environmentally sustainable. The participants may discover they are not always so far apart as the current press reports suggest. People can soften their views when they discover the extent of agreement on long term goals.

Corr. ID: 1009

Organization: Marin County Agricultural Commissioner

Representative Quote: Many existing Federal, State, and local agencies are available to work in a cooperative manner with PRNS administration, field staff, and ranchers to maximize productivity, resources management, and conservation practices. The United States Department of Agriculture - Natural Resources Conservation Services (NRCS), California Resources Agency, and Marin County Resources Conservation District (RCD), University of California Cooperative Extension (UCCE), and Marin County Agricultural Commissioner are great examples of locally available resources to assist with farm plans and project assistance. NRCS offers voluntary programs to eligible landowners and agricultural producers to provide financial and technical assistance to help manage natural resources in a sustainable manner. Through these programs the agency approves contracts to provide financial assistance to help plan and implement conservation practices that address natural resource concerns or opportunities to help save energy, improve soil, water, plant, air, animal and related resources on agricultural lands. The RCD has regional expertise in soil and waterway management and conservation practices, UCCE has expertise in farm sustainability, livestock and rangeland management, the Agricultural Commissioner is the regulatory agency overseeing pesticide use and USDA Accredited Organic Farm Certification Agency. These agencies could enhance, improve, and benefit the NPS in land use, conservation, and resources management and marketing activities.

Corr. ID: 1009

Organization: Marin County Agricultural Commissioner

Representative Quote: The finished Environmental Assessment document and resulting policies should be vetted with the Point Reyes Seashore Ranchers Association who should be allowed to be a partner in the discussion on implementation. The Ranchers Association should be the venue Park Superintendent uses to announce, discuss, and direct how the EA will be utilized once certified by the National Seashore. Collectively ranchers need to understand what the Park can do that may be beneficial so they can individually and/or collectively make sound decisions. These activities should be shared with all ranches and freely discussed within and between the Park and the ranchers. Applying Best Ranching Practices should be celebrated and recognized; learning from each other should be a primary goal.

Corr. ID: 2986

Organization: Marin Humane Society

Representative Quote: We would also be willing to provide support to the

Park in identifying potential ways to promote coexistence strategies to existing ranchers as well as responding to assist Park rangers on specific wildlife issues they are faced with. Having consistent protocols between borders works very well in the many other park boundaries we share with other stakeholders. We believe that it is imperative to have good communication and effective working relationships with all agencies within our County and we look forward to working closely with Seashore Park staff on wildlife issues.

Corr. ID: 3059

Representative Quote: More collaboration between Ranchers and Park Staff. There needs to be more opportunities for both sides to educate each other on why we feel the management practices we are using are necessary and justified.

Corr. ID: 3060

Representative Quote: " Management of the ranch lands needs to be a partnership between the Seashore and ranchers. In this partnership, both partners need to be strong or it's not a partnership. The best gauges of rancher strength are economic success and doing a good job of caring for their workers, the land, and the ranch structures. The Seashore's responsibilities are to help in at least three ways: have clear stewardship standards and clear statements of both rancher and Seashore responsibilities in implementing those standards; helping to provide resources for compliance with environmental standards; removing or preventing unnecessary impediments to successful ranch operations (helping to get streamlined permitting; balancing natural and cultural resource standards in ways that do not put the Seashore on a path toward unacceptable impacts or impairment of cultural or natural resources.

Corr. ID: 3070

Organization: McIsaac Ranch

Representative Quote: You have told the ranchers, on several occasions, that as the most affected by this EA, the ranchers would have more access to information that the project team is considering and a stronger voice in the process than the general public will have. We look forward to an active role in the complete process, including the establishment of the environmental baseline, revisions to the plan objectives, the creation of the project alternatives and the ultimate plan and roll out process. Please invite rancher participation through the Point Reyes Seashore Ranchers Association (PRSRA), as nearly all ranchers within PRNS and GGNRA are members of PRSRA and the association represents the interests of every rancher affected by this process.

Concern ID:

**CONCERN
STATEMENT:**

51910

One commenter was concerned that preliminary agreements between the NPS and the ranchers have already occurred, and requested that these discussions and agreements should be communicated openly. Another commenter suggested that the planning process should be transparent.

Representative

Quote(s):

Corr. ID: 30

Representative Quote: -Transparency for information exchange. Put all info out there so everyone can see all perspectives.

Corr. ID: 1015

Organization: Tule Elk foundation

Representative Quote: *We would like a clear understanding of the discussions that are or have occurred between the Point Reyes National Seashore leadership and staff and the current pastoral lands ranching operations over this next phase.

It appears from the media that discussions/decisions have already taken place. For example a quote from the Santa Cruz Sentinel news article entitled Point Reyes National Seashore ranches begin planning processes dated 4/23/14 states:

"Ranching is integral to our history and to our future here at Point Reyes National Seashore" by Cicely Muldoon, Park Superintendent. It continues "" "This plan will set a strong foundation for ranching now and into the future" " " .

And additional quotes in the news article: "The focus is on keeping ranching going and taking a look at these lease agreements", said Stacy Carlsen, the county's agricultural commissioner who has talked with ranchers about the process. "We also want to look at the ability for ranchers to diversity and to make that easier".

It appears, to the general public, that there are already preliminary agreements or at least discussions about preliminary agreements in place between the NPS and ranching operations.

Concern ID:

CONCERN

STATEMENT:

Representative

Quote(s):

51911

One commenter suggested that public meetings should be held in San Francisco to reach a wider audience.

Corr. ID: 965

Representative Quote: Keep doing what you have been doing so far to stimulate thoughtful comment. Your scoping questions with the backup outline of issues is comprehensive. I cannot recall a planning process starting off as meaningfully as what you have produced in your handout and what I learned at the Bay Model one evening since Bill Whalen started public process for the GGNRA 41 years ago. Since I don't know about your public outreach; I hope it is wide and deep. Perhaps you should consider a meeting in San Francisco once, say at Fort Mason, in order to reach more of the lovers of Point Reyes who live south of the bridge and would provide information from the vantage point of people who live further from the park.

Concern ID:

CONCERN

STATEMENT:

51912

One commenter suggested that a formal public vote take place to determine whether ranching families should be allowed to stay on public lands.

*Representative
Quote(s):*

Corr. ID: 990

Representative Quote: I believe these lands belong to the public and not cattle ranchers, so there should not be an 'entitlement' position, on the ranching families' side of this debate. I believe the public should be afforded a formal public voting platform, other than this relatively small audience giving their 'opinions' via email.

Concern ID:

51913

**CONCERN
STATEMENT:**

One commenter stated that the relationship between the park and the ranchers has been historically exemplary and that they would like to see this relationship continue.

*Representative
Quote(s):*

Corr. ID: 2963

Organization: West Marin Chamber of
Commerce

Representative Quote: The Chamber endorses Mr. Carlsen's statement that "the continuity of having economic viability in [PRNS] is important for the overall agricultural viability in this county, it's an integral part."* Clearly, the Seashore ranches are an indispensable part of the matrix of West Marin's variegated, dynamic economic health; they are also an crucial component of the cultural heritage of our region. Moreover, the relationship between PRNS and the Seashore ranches historically has been exemplary of the sort of necessary harmony that we Americans might expect throughout the western US where almost half of all livestock is grazed on public lands. The Chamber is eager to see the restoration of good relations between the government and agriculturalists generally. PRNS, in its establishing legislation, has embodied this spirit in the past and we are hopeful that it will again soon.

Concern ID:

52182

**CONCERN
STATEMENT:**

Commenters suggested that the NPS should form partnerships and/or advisory groups to help gather stakeholders' opinions and ideas.

*Representative
Quote(s):*

Corr. ID: 1009

Organization: Marin County Agricultural
Commissioner

Representative Quote: Ranchers identify the need for USDA assistance through an Environmental Quality Incentive Program (EQIP) project or conservation support programs. These activities have been evaluated within the agency of origin and comply with existing National Environmental Standards. The NPS should embrace and implement valuable projects without requiring a separate National Environmental Policy Act (NEPA) or other lengthy review before a project can be undertaken. The National Seashore Environmental Assessment should harmonize with other Federal and State agencies that have complied with EA procedures and allow for their utilization without further scrutiny. Many USDA projects are granted on an annual basis and delays in administrative approval eliminate the Seashore rancher to access while other ranchers in the region enjoy support and financial assistance. Between the PRNS, RCD, USDA, and other noted

agencies a very successful and collaborative approach could be reached benefitting everyone. Ranchers in the Park want to be recognized as Class A and have access to all available resources.

Corr. ID: 2775

Representative Quote: Rangeland management plans could be co-developed between the lessees, NRCS and NPS staff in an adaptive management approach to link agriculture and pastoralism to ecological stewardship, restoration and climate change resilience and mitigation. This approach builds on a growing movement of conservation scholars and practitioners, including those within NPS, to provide leadership in exploring integrated approaches to landscape stewardship at a time of unprecedented global change. See: "Speaking for the Future: A Dialogue on Conservation," Jan. 2003, <http://www.nps.gov/mabi/csi/new/speaking.htm> and *The Future of Working Cultural Landscapes: Parks, Partners, and Local Products*, 2008, http://www.nps.gov/csi/pdf/Working_Cultural_Landscapes_Report_Full.pdf This approach also provides synergistic support for the efforts underway in west Marin County to enhance and strengthen our sustainable agricultural community, including the work of our Agricultural Commissioner, the Marin Agricultural Land Trust, the Marin Resource Conservation District, Marin Organic, UC Cooperative Extension and the Marin Carbon Project. By taking this approach, rather than one that conceptualizes natural and cultural resources as existing in conflict, PRNS has the opportunity to become a model for parks management around the nation, an opportunity deferred for the past 50 years.

Corr. ID: 3060

Representative Quote: " Stewardship - The Seashore needs better means to ensure that best agricultural practices are followed. The Ranch CMP should contribute to that objective.

- The Seashore should create a formal relationship with a partner, advisor, or agent such as NRCS, RCD, and UC Cooperative Extension. Under that relationship, the Seashore would retain ultimate responsibility for management of the lease I permit and ensuring that NPS policies are followed. The NPS partner could have responsibility for up to and including day-to-day management of the lease/permits and relations with ranchers.

- The permittee and the Seashore (and its management partner, advisor, or agent, if there is one) should agree on a stewardship plan specific to the ranch with each lessee/permittee whenever a lease/permit is renewed or when there is a new lessee I permittee. The agreement should cover changes in generally recognized stewardship practices and stewardship projects that are to be completed. The negotiated agreement should specify NPS expectations and the responsibilities of both the lessee/permittee and the NPS (and the management partner, advisor, or agent, if there is one). The agreement should include a schedule and timetable for implementation. There should be periodic review (annual? biennial?) to assess fulfillment of the terms of the lease/permit. The Ranch CMP should specify how the Seashore will evaluate permittee/lessee compliance with the terms of the lease/permit and what the consequences are of inadequate compliance.

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: This EA should evaluate the benefits of a creating and contracting with a third party non-profit with a board consisting of local agriculturalists, local range managers who regularly work with seashore ranchers, and agency representatives to manage the day-to-day administration of the range management plan as an NPS partner. Board members would be familiar with agricultural practices in the Marin and Sonoma foodsheds and with the culture, climate, soil and market conditions that impact the ranches in the seashore.

This model is consistent with NPS policies supporting local community involvement and with the UNESCO principles for World Heritage Site cultural landscapes. It is particularly appropriate for working or continuing landscapes, which are often part of larger communities. The Cuyahoga Valley Rural Initiative serves as precedent. In that instance, NPS entered into an agreement with a non-profit to manage all agricultural lands and leases within this unit. PRSRA believes that this model should be analyzed as a solution for the project area. The benefits could include:

- (1) Improved relationship and trust between parties;
- (2) Day-to-day oversight provided by individuals with experience in dealing with local conditions in an agricultural community recognized nationally and internationally as a leader in sustainable and ecologically sound agricultural practices;
- (3) More continuity, as members of the non-profit will likely have less turnover than PRNS staff;
- (4) Community involvement with the future of food production in the project area; and
- (5) Reinforced public commitment to continue viable agriculture in the project area in perpetuity.

Corr. ID: 3089

Representative Quote: That an Advisory Forum be formed from the Park Staff and Community Members to help with some of the problems that if not addressed have in the past divided this community. This group could help build trust that now is lacking in the community. that the community be advised as soon possible (by local papers, the local Radio Station and community flyers,) of meetings, problems and decisions that could effect all of us. These actions could also help build more trust and another way for all of us to work together.

Concern ID:
CONCERN
STATEMENT:

52184

One commenter made several suggestions regarding information that should be included in the Ranch CMP, including: define the current and desired conditions for all lands within the pastoral zone while offering strategies to meet desired conditions; include maps of soils, vegetative communities, wildlife habitats, water resources, and livestock use areas; include a map and tabulation of range development; and provide a background of grazing documenting the amount of public money that was used for the buyout and

explaining the terms and conditions.

*Representative
Quote(s):*

Corr. ID: 1055

Organization: Western Watersheds Project

Representative Quote: The Park should clearly define the current and desired conditions for all lands within the pastoral zone including riparian and upland areas. The Park should offer grazing strategies that are capable of achieving those desired future conditions within a specific timeframe. The NEPA documentation should include maps showing soils, vegetation communities, wildlife habitats, all springs and riparian areas, and livestock use areas. The Park should map and tabulate all existing range-developments including fences and water developments.

The Park should also explain the background to grazing on the Park following the 1962 establishment. It should document the amounts of public money that was used to buyout the ranches in the pastoral zone and explain terms and conditions of those acquisitions.

IS1000 - Issues: Environmental Baseline Conditions

Concern ID:

51782

CONCERN

STATEMENT:

Commenters stated that the baseline for consideration of environmental impacts under the Ranch CMP should include current lease requirements and should not include the occurrence of tule elk in the pastoral zone.

Commenters also questioned how the baseline would address the removal and forage consumption of exotic deer.

*Representative
Quote(s):*

Corr. ID: 2960

Organization: Marin Conservation League

Representative Quote: Tule elk were extirpated from the Pt. Reyes area more than 150 years ago by a combination of hunting, logging, and ranching. Therefore, until recent years, there were no tule elk to compete for forage or interfere with ranching activities. Allowing a free ranging herd of tule elk in the pastoral zone was rejected as an alternative in the 1998 Elk Management Plan and EA. The Seashore's 2001 "Year in Review" acknowledged the need to "carefully monitor" to keep the elk outside the pastoral zone, to prevent their interfering with the cattle ranches and to ensure that the elk "are not shedding the organism that causes Johne's disease." Nevertheless, beginning in about 2002, the park stopped actively managing the elk. Efforts to keep the elk out of the pastoral zone ceased. It is because some of the cattle in the pastoral zone may have Johne's disease that that herd cannot be immediately transported to Wildlands Conservancy wilderness sites, at Wildlands Conservancy expense. Under these circumstances, the development of a herd of tule elk in the pastoral zone must be recognized as a temporary condition and not taken into account in establishing the baseline for environmental review of a ranch management plan.

Corr. ID: 3036

Representative Quote: Baseline for Plan: The herd of tule elk in the pastoral zone must not be included in the baseline for the Ranch

Management Plan. There was no public process before the currently un-leased portion of D Ranch was taken out of agriculture. There was no public process before three tule elk cows and a bull elk appeared on the un-leased portion of D Ranch less than a year later. At best allowing those tule elk to range free in the pastoral zone knowing that they might be infected, or become infected, with Johnes or other infectious diseases transmittable between cattle and elk was grossly negligent management of wildlife and the pastoral zone. There is simply no circumstance under which that herd could have developed in the pastoral zone that does not reflect negatively on PRNS and its ability to manage wildlife, or that excuses an obligation to remove the elk from the pastoral zone. Without prior environmental review of the impact of tule elk in the pastoral zone, the presence of tule elk in the pastoral zone must be recognized as a temporary condition.

Corr. ID: 3040 **Organization:** National Parks Conservation Association

Representative Quote: Baseline: What is the baseline against which the Ranch Plan and new 20-year leases will be measured? The baseline for consideration of environmental impacts should be what the existing leases provide for, most of which represent existing authorized conditions and practices. If leaseholders have violated their permits, for instance, the unauthorized practices should not represent the baseline. Additional questions that should be considered in determining the baseline for the Ranch Plan include: 1) What impact did the removal of the several hundred exotic deer that foraged in the pastoral zone and at the Outer Point have on the amount of available forage for cows? 2) Will the level of forage consumption by the exotic deer be accounted for in the baseline?

Corr. ID: 3076 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: Tule elk were extirpated from the subject area by the 1860s. Tule elk were not present during the Shafter era. Tule elk were not present when Congress entrusted the NPS to protect the seashore, the ranches and farms and the people on the ranches and farms. Only a few years ago, NPS decided to re-introduce tule elk to the 18,000 acre designated elk range located entirely within the Limantour wilderness area. By this time (1998), it was well known that introduced tule elk in an area without predators could become highly invasive. The current elk management plan reassured seashore ranchers at the time that the ranch lands would be protected because the plan stated that the elk would not negatively affect any other permitted use (long-standing ranch SUPs) and the plan included tools to manage elk overpopulation, including contraception, relocation and culling. For some years, PRNS interpreted the plan just as the ranchers interpret it and kept the elk off of the ranch lands.¹ The Seashores 2001 Year in Review (attachment D) acknowledged the need to carefully monitor to keep the elk outside the pastoral zone, to prevent their interfering with the cattle ranches and to ensure that the elk are not shedding the organism that causes Johnes disease. Nevertheless, beginning in about 2002, the park stopped actively managing the elk. Efforts to keep the elk out of the pastoral zone ceased. Under these circumstances, the development of a herd of tule elk in the pastoral zone must be recognized as

a temporary condition and not taken into account in establishing the baseline for environmental review of a ranch management plan.

Concern ID:
CONCERN
STATEMENT:

51831
Commenters stated that, because ranching and farming activities have occurred in the area for 150 years, these activities represent the baseline condition for the Ranch CMP. One commenter suggested that the Ranch CMP fully describe the need for the NEPA process at this time to continue current ranching operations that have occurred for a 150-year timeframe while there was not a requirement for NEPA for past changes of land use in the park.

Representative
Quote(s):

Corr. ID: 3070 **Organization:** McIsaac Ranch
Representative Quote: We have been told that NEPA requires PRNS to review the environmental consequences of a change of use, or change of intensity of use, of the ranchlands. This might be why PRNS has started this current process. If this is true, this EA process should share with the public and evaluate the NEPA process that was undertaken by PRNS to radically change a 150-year stable baseline of grazing by removing the historic agricultural activity on the Jewell Ranch. At the time, because of previous similar decisions to exclude livestock from the wilderness areas, PRNS would have known that removing grazing would result in a loss of the cultural working landscape, an adverse effect on the local economy, a dramatic change in the rangeland plant and animal communities and a significant increase in the risk of wildfires. If PRNS made its decisions to remove grazing from the Jewell Ranch, or any other ranch, without a formal NEPA process, this EA must fully evaluate if an EA is actually required to resume the 150 year baseline activity. If PRNS declares that NEPA review is required here, this EA must fully explain why, if no formal process was undertaken for the removal of grazing, a formal NEPA process is required to resume the historic , baseline activity of grazing .

Corr. ID: 3076 **Organization:** Point Reyes Seashore Ranchers Association
Representative Quote: THE APPROPRIATE ENVIRONMENTAL BASELINE

Ranching and farming activities have been present in the subject area for at least 150 years. During the cultural period focused upon in this assessment, the Shafter era, an extremely diversified agricultural network existed. During this period there were thousands of acres in crop production, a myriad of livestock species being raised, oysters being harvested, processing facilities for milk, cheese, butter, meat and crops and spring forages were being harvested and stored for winter livestock feeding.

The current baseline looks very similar to what has existed for 150 years, with a few exceptions. Today most of those activities are permitted by PRNS on some ranches, but not all. If an activity is currently allowed, it should be part of the current environmental baseline. For example, the current baseline includes dairy and beef operations, storage of on-farm harvested

forage for livestock feeding, small scale row crops, poultry raising, oyster farming, bed and breakfast operations, on-farm sales of products raised in the seashore, horse boarding and on- farm tours and interpretation. Allowing all ranchers the same authorizations to undertake activities that PRNS already allows for some ranchers should not require an EA. Only new activities, not a part of the current baseline, should be the subject of this EA.

Concern ID:
CONCERN
STATEMENT:

52174

Commenters presented several elements that need to be assessed and explained pertaining to the tule elk in the park, including: assess the presence and transmission capacity of Brucellois in wildlife and livestock, provide data on the weight of elk, determine the amount of forage consumed by elk and livestock, determine the amount of other feed eaten by elk, address the claim of the occurrence of elk stabbing livestock with antlers, explore the possibility that the elk population is self-regulating and not in need of management, explore the claim that elk will starve if moved from the pastoral zone, address the claim that the park moved the elk into the pastoral zone, assess the impacts from extensive fencing, assess the success of using water to lure elk from cattle areas, and assess the success of fencing around ponds to exclude elk. One commenter would like the park to provide specific information pertaining to the tule elk, including: the location of impacts; a description of impacts to ranching operations; a description of the nature and extent of impacts to pastures; a description of how water is provided to cattle, how the elk are accessing this water, and how much of this water is being consumed; and a description of what hazing methods are being used and their efficacy.

Representative
Quote(s):

Corr. ID: 2998

Organization: Save Our Seashore

Representative Quote: 43. Assess presence of Brucellosis in both PRNS wildlife and PRNS livestock

44. Assess potential that Brucellois can be transmitted from wildlife to livestock

45. Assess potential that Brucellois can be transmitted from to livestock to wildlife
56. Assess to what extent elk actually eat livestock forage (vs % sparate diet niche)

54. Determine actual weight of elk in pastoral zone (500 or 1000 lbs?)

55. Measure forage consumed in the pastoral zone by elk vs forage consumed by livestock

58. Assess possibility that elk can and have stabbed cattle to death with their antlers

59. Assess if elk are self-regulating and do not need population control to protect vegetation

60. Assess possibly that pastoral elk relocated to wilderness will starve w/o more carrying capacity

68. Assess claim that NPS trucked elk in vs collar data showing elk moved naturally into pastoral zone

69. Assess impact from extensive and expensive fencing needed to keep elk in wilderness zone

70. Assess use of ponds created at fringes of pastoral zone to lure elk from intense livestock areas

71. Assess use of elk fencing around stock ponds to deter elk from intense livestock areas

Corr. ID: 3049 **Organization:** Marin Audubon Society
Representative Quote: Describe how water is provided to cattle, how elk is accessing this water and how much water do the elk consume. What are the hazing methods used to push elk off active ranchlands and how effective are they?

Corr. ID: 3049 **Organization:** Marin Audubon Society
Representative Quote: Describe and show on a figure and show where the impacts of the elk are occurring. Describe how the elk are impacting the ranching operations. How much forage is lost to elk grazing? Describe the nature of and extent of the damage that is being caused to pastures? Discuss damage to fencing and how that is being addressed.

Concern ID:
CONCERN STATEMENT:

52225
One commenter requested further information on cattle grazing, including cattle numbers and amounts of vegetation consumed during different times of the year. They further requested current grazing information to be presented with an inventory of fences, corrals, water developments, use of supplements movement of cattle and more information on the relationship between grazing on various land allotments, how much area is covered in cattle pats, and disclosure of the total effluent discharges.

Representative Quote(s):

Corr. ID: 1055 **Organization:** Western Watersheds Project
Representative Quote: The Ranch CMP should tabulate actual grazing use across the pastoral zone including cattle numbers, amounts of vegetation consumed, and seasons of use. Current grazing management should be disclosed including any reductions in authorized use that have been made in response to resource conditions. The documentation should include a complete inventory of range developments including miles of fence, number of corrals, number of water developments, use of supplements, movement of cattle onto and off these public lands, and the relationship between grazing here and on any other public lands allotments.

The Ranch CMP should document how much of the grazed is covered in cattle pats, and the total effluent discharges associated with dairy operation.

IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future)

Concern ID:
CONCERN STATEMENT:

51870
Commenters noted that ranchers have been a part of the landscape for generations and that maintaining agriculture in the park is important to agriculture both locally and nationally. Because farmers and ranchers in West Marin County are pioneers in sustainable and organic practices,

agriculture in this area is critical to the future of the national food supply. Additionally, maintaining agriculture in the park is important to maintaining the support services, marketing opportunities, and economic sustainability for agriculture locally.

*Representative
Quote(s):*

Corr. ID: 1042

Organization: Brown Bag Farms

Representative Quote: The ranching community of West Marin should be supported with their stewardship instead of being unsure of whether or not their leases will be renewed. These are families that have been part of this landscape for generations who probably now wish that they had never sold to the Park and are being told by Washington how to run their lands.. As far as I can tell they are good stewards of the land and the oyster farm has been there as far back as I can remember.

Corr. ID: 1697

Representative Quote: Insofar as NPS policies could contribute to ranches in the Seashore going out of business, the secondary impacts of the reduced demand for agricultural services in Marin and Sonoma counties must be assessed. Local agricultural officials and other experts have stated, in recent years, that they are concerned about the levels of demand for ag services dropping below the levels that allow certain suppliers of inputs, or certain processors of outputs, to stay in business. The loss of some of these services would likely increase production costs, or reduce prices obtained, and so make agriculture less financially feasible in the Seashore and elsewhere in Marin county.

Corr. ID: 3048

Organization: Sonoma Marin Veterinary Service

Representative Quote: Local food, natural food, these have become touchstones in our modern attempt to balance our desire to live well and yet live within the bounds of nature's limits. The ranchers of the seashore represent this ideal by both preserving their long standing traditions and adopting new ideas as is witnessed by the recent expansion of certified organic production within the seashore. If ranching cannot succeed within the seashore, then any goal of local, sustainable food production within the San Francisco Bay area is deeply wounded.

Corr. ID: 3057

Organization: Marin County Agricultural
Commissioner

Representative Quote: Point Reyes National Seashore ranches and dairies operating in the Point Reyes .National Seashore (PRNS) account for nearly 20% (\$16.8 million) of all gross agricultural production in Marin County. These ranches and dairies play a critical role in maintaining the viability of Marin County's agricultural system. There are 16 livestock ranches and 7 dairy operations in the PRNS. Ranching and farm culture in "West Marin Point" has gone on for over 150 years. Their history stems from the "Gold Rush-49er Era" and framed by the "Shafter Era" giving way to today's multi-generations family operations. Interestingly, all dairies in the Seashore area are Certified Organic under the USDA National Organic Program, certified by the Marin County Agricultural Commissioner and other accredited

organic certifiers demonstrating the progressive nature and willingness to support animal health, and environmental protection. Collectively, the entire Pastoral area of the Seashore Agricultural region represents one of the largest contiguous organically certified areas in California, possibly the nation. This is a pinnacle in terms of production model and land sustainability.

Corr. ID: 3063

Representative Quote: This EA should recognize all the benefits of allowing me to return home. I will provide the rangeland stewardship to preserve the historic grasslands, I will bring the same cattle back to their rightful home, and I will save the taxpayers by relieving the PRNS of the sole responsibility for maintenance to fencing, roads, buildings and other infrastructure. I will help to preserve the pastoral zone with the cultural use Congress intended for it.

Corr. ID: 3074

Organization: Sonoma State University

Representative Quote: In the recent past, NPS management of the Seashore has been increasingly out of step, both with these changes to heritage preservation at the global scale, but also changes to the agricultural economy at the local scale. While PRNS has taken ranches out of operation and is attempting to shutter the oyster farm, the rest of West Marin has turned into an amazing hub of food production and consumption, a mecca of modern sustainable agriculture. Most of the area's dairies and beef ranches have gone organic and/or primarily grass-fed. There has been a huge increase in artisanal cheese-making, and overall a broader diversification of agriculture, including production of more vegetables, chickens, etc. Organic production of all kinds of agricultural goods has moved from being a fringe activity to the economic mainstream of West Marin, as part of a broader nation-wide movement. In particular, partly in reaction to the 2002 federal definition of "organic" and the increasing presence of industrial-scale production of organic products, many West Marin producers have focused more on emphasizing local and seasonal production. The area's proximity to the high-end metropolitan market of the larger Bay Area that seems increasingly willing to pay the higher prices for premium agricultural products has given West Marin a new boost of confidence that food production is not doomed to disappear, as has been presumed to be almost inevitable since the 1950s.

The agricultural operations on PRNS and GGNRA lands represent a substantial portion of this economy, contributing 17 percent of Marin's overall agricultural production and 17 percent of its agricultural land base. The 2007 Marin Countywide Plan lists among its core goals the protection of the area's working agricultural landscapes, and greater community food security by increasing the availability and diversity of locally-produced foods. Grazing on these lands also provides important ecosystem services, such as managing non-native weedy species and reducing fire danger. And most of the ranching families have historic connections to the land that go back through generations, helping to anchor the overall community's sense

of identity and place.

Corr. ID: 3075

Representative Quote: More and more global food production has been contaminated by Genetically Modified Organisms, pesticides, is being provided by Big Ag., or shipped long distances, wasting precious natural resources. What we have in Marin, especially within the Seashore, should serve as an example to agriculture everywhere about how things can and should be done.

Concern ID:
CONCERN
STATEMENT:

51832

Commenters expressed concern over current ranching conditions including cruelty to animals, use of antibiotics, impacts to wildlife and wildlife habitat, impacts to water quality, impacts to soils, impacts to air quality, and contributions to climate change. Commenters also expressed concern for preference for a non-native species, cattle, over native species.

Representative
Quote(s):

Corr. ID: 2213

Representative Quote: The ranching industry is cruel and adds to the global warming. Antibiotics are forced on those poor animals. Wild animals already facing tremendous survival pressures should not have their fate determined by ranchers.

Corr. ID: 36

Representative Quote: beef production is all about killing cows & its wrong for this to occur on public land. Dairy is even more cruel, cows are regularly raped to keep them pregnant/lactating. Their babies are taken away at 24 hrs old to be sold as veal or they are killed outright at 1 day old! The dairy & meat are leading causes of chronic disease in the country & consumption of animal products is the main reason our health care system is going bankrupt.

Corr. ID: 509

Representative Quote: Moreover, these ranchers are defying God's laws of Compassion by violating the eternal law "Thou shalt not kill." They are deliberately raising animals to suffer the horrors of slaughterhouses for the filthy of ambition of wealth and profit. God abhors sin and violence and these ranchers move from sin to sin and want to drag others into sin and violence as well.

Corr. ID: 2482

Representative Quote: Reasons why livestock grazing is a detriment to the seashore ("Livestock" are actual beings of earth to begin with, and use of such terms for sacred life forms as "game" "Livestock" etc are ignorant and promote horror and suffering for all life on Earth as the processes and attitudes are perverted and filthy, anti-spirit and against freedom and good karmic path. Cattle and other animal industries for monetary profit for a few are ruining the lives of indigenous beings, destroying habitats, forests, soils, air, water, and causing mass extinctions of so many categories of life on

Planet Earth that we are facing destruction unlike anything seen in the history of the Universe. We must stop.

Concern ID:
CONCERN
STATEMENT:

51834
One commenter expressed concern over the impacts to ranch operations related to climate change and the predicted variability in rainfall. Another commenter noted that drought conditions have already caused impacts to ranch operations resulting in the need to purchase additional feed.

Representative
Quote(s):

Corr. ID: 1140 **Organization:** Environmental Action Committee of West Marin

Representative Quote: EAC understands that, due to the drought conditions this winter, dairy operations had to purchase a second semi-truck load of organic hay that cost approximately \$9,000 and directly affected the operations bottom line.

Corr. ID: 2960 **Organization:** Marin Conservation League
Representative Quote: Climate and rainfall are predicted to become more variable. In the event of multiple drought years, local water supplies may be unable to maintain pastureland. What measures can be taken to enable the ranches to continue to prosper in the face of climate uncertainty, for example, providing offsetting credits for water source development, and establishing best management practices that improve water use efficiency.

Concern ID:
CONCERN
STATEMENT:

51873
One commenter noted that mowing and windrowing of grasses is critical for controlling weeds and improving pasture quality thereby reducing reliance on imported feeds.

Representative
Quote(s):

Corr. ID: 3065
Representative Quote: Weed Management

Organic dairies have taken the place of conventional dairies in the Point Reyes National Seashore, and pasture and forage production is a key part of these family farms surviving for the next generation. Mowing or windrowing grasses, weeds, and brush have been proven to be a successful process that we have in controlling the spreading of evasive weeds. The bull thistle, poison hemlock, coyote brush and other problem weeds are an ongoing nuisance to our ranch specifically. The quality of our pasture is a key factor in producing high quality milk and reducing the reliance on imported feeds.

Concern ID:
CONCERN
STATEMENT:

52219
Commenters provided information regarding the history and background of ranching and agriculture in the area indicating that these practices provide economic, employment, and educational benefits. Broader benefits that were noted included the contribution to preservation of regional agriculture and economies.

Representative
Quote(s):

Corr. ID: 1029 **Organization:** U.S. Congress

Representative Quote: These ranches and dairies also provide broader benefits: they help preserve agriculture outside the park boundaries by ensuring that our regional agricultural economy, consisting almost entirely of small-scale agricultural operations, remains large enough to support the facilities and services that are necessary for most of these ranches, dairies and farms to stay viable. Congress showed great vision by providing for ranching to continue within the Seashore to ensure that future generations would be able to experience the park's unique working landscapes. That vision, and the many benefits it represents for the park and our region, is worth protecting.

That's why we are writing to express our firm commitment to ensuring that environmentally and economically sustainable agriculture remains a permanent part of the Point Reyes National Seashore.

Corr. ID: 3076 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: The members of the PRSRA provide a number of important environmental, educational and economic benefits to the area. Ranchers have had most of the agricultural land within the seashore certified organic. Ranchers work closely with the Marin County Resource Conservation District (MRCD) and the Natural Resources Conservation Service (NRCS) to adopt new conservation practices and implement on the ground projects to protect and improve natural resources. Most of these beneficial projects come by choice, and at the financial expense of the historic rancher or farmer. PRSRA members provide exceptional educational opportunities. Members of PRSRA partner with other organizations and agencies to help inform the public about the benefits of family farming. One PRSRA member, the Drakes Bay Oyster Farm, provides on-farm educational opportunities for schools, organizations and roughly 50,000 members of the visiting public annually. PRSRA members produce over 20% of Marin Countys agricultural products, generally, and more than half of Marin Countys oysters, specifically. The land in the Olema Valley and Point Reyes Historic Ranch Districts constitutes approximately 25% of the land available for agriculture in Marin County today. The ranchers within the project area provide a significant number of jobs as well as affordable housing for their employees. The milk, beef and other farm products flowing into our local region provide more economic opportunities for the region through distribution, retail and restaurants featuring local farm products.

Concern ID:
CONCERN
STATEMENT:

52221
One commenter expressed concern over future actions threaten the continuation of agriculture in the park and therefore threaten the larger county. They suggested that the NPS should assess the cumulative impact of park-based agriculture on the viability of agriculture county-wide.

Representative
Quote(s):

Corr. ID: 3083 **Organization:** Lunny Ranch
Representative Quote: The reality for the family farm has changed. Over

the past decade or so, the U.S. is losing approximately 50 family farms per week and big ag is getting bigger. Small family farms have realized that the secret to survival is to begin to move away from large scale single commodity monoculture and refocus on small scale diversified agriculture and local markets. The local marketing allows small farmers to build local relationships, collaborate with other ranchers on value added products processing and distribution. This "new" model is actually a recreation of the traditional diversified farms found on the Point Reyes peninsula during the Shafter era, not long before it became a unit of the NPS.

Concern ID:

52223

**CONCERN
STATEMENT:**

One commenter expressed concern over future actions threaten the continuation of agriculture in the park and therefore threaten the larger county. They suggested that the NPS should assess the cumulative impact of park-based agriculture on the viability of agriculture county-wide.

Representative

Quote(s):

Corr. ID: 3068

Organization: Marin Agricultural Land Trust

Representative Quote: Agriculture in PRNS and GGNRA represents approximately 17% of the County's agricultural land base and 17% of its agricultural production. As such, agriculture in PRNS is an essential part of the County's agricultural "critical mass," which is, in turn, a fundamental part of the socioeconomic character of Marin and the region. Any action that could increase pressure on or threats to the continuation of agriculture in PRNS represents a threat to the viability of agriculture in the County, and to the economic, environmental, social, cultural and historic values of agriculture in PRNS and Marin.

As you move forward with the CMP/EA, we strongly encourage you to consider the impact of the CMP on agricultural operations in PRNS and GGNRA and on agriculture in Marin County. Furthermore, we would strongly support an analysis of the economic importance of continued ranching in PRNS and GGNRA to the viability of agriculture in the rest of the County.

IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future)

Concern ID:

51881

**CONCERN
STATEMENT:**

One commenter indicated that, due to the short-term nature of SUPs, it is economically unfeasible for ranchers to undertake costly, long-term management actions on their property. Another commenter stated that, due to existing permit language, ranching operations are not properly appraised because they often do not take into account capital improvements.

Representative

Quote(s):

Corr. ID: 3074

Organization: Sonoma State University

Representative Quote: One of the key elements of the Countryside Initiative program is the use of long-term leases; as stated in the 2011 RFP:

Prior to these current authorizations, use of NPS lands for agricultural

purposes has been limited to Special Use Permits (SUPs) covering periods of one to five years. Although short-term SUPs are intended to prevent or limit serious damage to park lands, ironically, they act as a negative incentive to basic land stewardship. It is economically infeasible for farmers to undertake costly long-term land care programs, which can take years or decades to implement, since they have little assurance of a reasonable return on their investment. The leasing authority now available for the Countryside Initiative resolves this inherent dilemma.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: PRSRA is concerned that when rural land appraisals are completed by PRNS contractors, the appraisers are unaware that it is the rancher or farmer that has usually paid for capital improvements, not the NPS as the permits suggest. The resulting appraisal may be higher than if the appraiser knew the rancher actually has to pay for capital improvements.

Concern ID:
CONCERN
STATEMENT:

51876
Many commenters stated that ranchers have already been paid for their land, their leases have expired, and they are currently paying artificially low lease prices that are being subsidized by the taxpayers. Commenters further noted that these lands do not belong to the ranchers, but rather belong to the public, are open to the public and wildlife, and that subsidies are no longer justified.

Representative
Quote(s):

Corr. ID: 1909
Representative Quote: Increasingly, the ranchers have become more aggressive and arrogant and frequently take action to actually push the people off "their land" even though it isn't theirs! And because they encroach on "their land" and compete with "their right" to graze cattle it seems that they want to kill every animal in sight - the elk, the deer, the coyotes, etc .

Corr. ID: 2326
Representative Quote: Ranchers were paid for their land. Starting in 1969 and throughout the 70s, millions of dollars were paid to the ranching families on the Coastal Prairie now called "The Pastoral Zone."

Ranchers signed 20-year-leases, which have all expired. Soon after signing their 20 year leases ranchers hired lobbyists to take their case to Washington, D.C. so that they could keep the money, remain on the park lands in perpetuity, while continuing to pay artificially low leases.

Corr. ID: 2568
Representative Quote: Ranchers, since the early 70's have been paid millions of dollars and were supposed to vacate the land. It clearly seems they have an expensive lobbyist in Washington DC to push around those in charge in order to ensure they can stay forever. However, they are now becoming more aggressive and arrogant and are so puffed up with confidence that they push people off of what they think is "Their Land" even

though it isn't.

Corr. ID: 3064

Organization: In Defense of Animals

Representative Quote: Furthermore, according to Western Watersheds Project, "The cost of public lands ranching to American taxpayers is enormous. The current public land grazing fee of \$1.35 per month for one cow and her calf is woefully below market value. Direct government expenditures to administer public land grazing constitute an annual net loss to the taxpayers of at least \$123 million and more than \$500 million when indirect costs are accounted for. As much as 96% of these public dollars are spent to enhance livestock production in direct conflict with legal mandates to restore the health "of public lands"

(<http://www.westernwatersheds.org/issues/public-lands-ranching/>)

The situation at PRNS is not any different. Ranchers have been paying grazing fees at about \$7 per cow and her calf per month, which is about half of the going price to rent grazing land outside the park in Marin County. These artificially low fees are being subsidized by the public, a fact that has been rightfully termed "welfare ranching.

Corr. ID: 3064

Organization: In Defense of Animals

Representative Quote: This unfounded sense of entitlement among ranchers also prompts them to claim that tule elk encroach onto "their" lands, and to the demand that the NPS should remove tule elk. Again, the land is coastal prairie, not "pastoral zone" and the land belongs to the wildlife and the public.

Concern ID:
CONCERN
STATEMENT:

51880

One commenter stated that the 20-year lease terms do not take into account economic uncertainties and that these ranches in the park may not be economically feasible in the future. Another commenter stated that short-term permits create uncertainty and make ranch improvements difficult. This combined with any decrease in grazing acreage or competition for forage by elk threatens the organic production and the economic stability of the ranches.

Representative
Quote(s):

Corr. ID: 1032

Representative Quote: Lease permit terms of up to 20 years do not take into consideration of the changes that may take place during those years:

- *An uncertain economy
- *Competition from Central Valley corporations
- * Loss of farming interest among heirs
- * Public need
- * Preservation of natural resources
- * Negative scenic impact
- *Overgrazing
- * Rising feed costs
- * Additional costs to taxpayers to support these private businesses.

Ranching within the seashore may not be economically feasible in the future

and a twenty year commitment by the park may become an expensive burden.

Corr. ID: 3022

Organization: University of California
Cooperative Extension

Representative Quote: Ranch economics. As of 2007, agricultural operations on PRNS ranches contributed 17% of direct agricultural income in Marin County, yet most PRNS ranching families have no future security, as they are operating under five-year SUPs. What that means to a beef cattle operation is that investment in infrastructure such as fencing for improved grazing management cannot be capitalized over the life of their SUPs, creating a disincentive for improving ranch operations. Since 2007, feed prices for both cattle and dairy operations have skyrocketed, especially for organic operations. Additionally, organic dairy and livestock grazing operations are required by the USDA National Organic Program to meet 30% annual forage requirements over 120 days per year from pasture. Therefore, any decrease in PRNS pasture acreage, or competition for forage from tule elk, threaten organic production and the economic stability of PRNS ranches.

ISI200 - Issues: Cultural Resource Management (past, present, and future)

Concern ID: 51882

**CONCERN
STATEMENT:**

Commenters noted that the 1980 GMP allows for agricultural practices to occur in the park. They also noted that the Point Reyes Ranches and the Olema Valley Ranches have been found to be eligible for nomination to the National Register of Historic Places as Historic Districts, and that the park should recognize the pastoral areas of the park as "continuing cultural landscapes." Ranches are also eligible for designation as United Nations Educational, Scientific, and Cultural Organization (UNESCO) World Heritage Sites.

**Representative
Quote(s):**

Corr. ID: 2775

Representative Quote: NPS should nominate the Historic Ranching Districts in the Olema Valley and Point Reyes for World Heritage Site status. The World Heritage Conventions World Heritage Cultural Landscape designation provides for the protection of cultural landscapes as combined works of nature and man. Conservation is integral to the definition of continuing cultural landscapes, in which people associated with the cultural landscape are the primary stakeholders for stewardship, the value of the cultural landscape is based on the interaction between people and their environment, management of the cultural landscape is integrated into a larger landscape context, and successful management contributes to a sustainable society.

Corr. ID: 3074

Organization: Sonoma State University

Representative Quote: Despite the long history of Congressional intention detailed above, the number of working ranches (i.e. not just the acreage of land used for grazing) within the boundaries has dwindled significantly since

the Seashore was established. Today there are only six dairies still in operation on the peninsula, and five beef ranches. The Olema Valley and Lagunitas Loop areas support six additional active beef ranches and one horse ranch, but no dairies.

Both the Point Reyes Ranches and the Olema Valley Ranches have already been found to be eligible for nomination to the National Register of Historic Places as Historic Districts; those nomination forms should be submitted and finalized, to formally recognize the ranches' importance to the overall history and sense of place at the Seashore.

Corr. ID: 3074

Organization: Sonoma State University

Representative Quote: In forming the Seashore's General Management Plan, released in 1980, NPS staff wrote, "Although the establishment of the seashore and influences within the dairy industry have resulted in a reduction of agricultural activity at Point Reyes, Congress clearly intended that the ranches continue to operate." The GMP describes the "Pastoral Landscape Management Zone," which is defined as the northern Olema Valley and northern Point Reyes peninsula: "This zone includes lands within which it has been determined that dairying and cattle ranching are desirable aspects of the scene from both an educational and aesthetic point of view. At a minimum, agricultural buildings and open grasslands will be retained in these areas, and where feasible, livestock grazing will continue within the limits of carefully monitored range capacities."

I believe that all of these historical statements and intentions must be kept in mind as the Seashore moves forward with its Ranch CMP process, particularly to avoid a form of "mission creep" where commitments made early on in the park unit's history are downplayed or overlooked as time goes by.

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: World Heritage Site Status. The Point Reyes and Olema Valley Historic Ranch Districts, located within Point Reyes National Seashore, are eligible for listing on the National Register of Historic Places. This EA should evaluate the nomination of these historic Ranch Districts for World Heritage Site status. PRSRA believes that NPS can nominate these ranch districts for World Heritage Site Status and that this status would further the plan objective of preserving ranching and farming in the project area in perpetuity. In the meantime, with Cuyahoga as precedent, NPS could and should manage the lands consistent with World Heritage Site principles for managing continuing cultural landscapes.

Concern ID:

**CONCERN
STATEMENT:**

51883

Commenters suggested that the Ranch CMP consider removal of tule elk from the pastoral zone and develop a plan for managing the ranches to ensure the long-term viability of agriculture in these Historic Districts. Management should include: fencing elk out of the Historic Ranching Districts; managing ranches as defined by UNESCO World Heritage Sites; and creating a contract with a nonprofit corporation for services similar to

*Representative
Quote(s):*

[those provided by the Cuyahoga Valley National Park's nonprofit partner.](#)

Corr. ID: 2960

Organization: Marin Conservation League

Representative Quote: Describe measures that would be needed to preserve and protect the ranches in the pastoral zone as part of a "cultural landscape," as defined by the UNESCO Convention on World Heritage Sites, that is, "a diversity of manifestations of the interaction between humankind and its natural environment." In particular, describe measures that will enable these ranches to thrive, ranches now leased or worked by third, and fourth or fifth generations on the land. These ranches fall into the "continuing landscape" category, in which the ranches are to be managed so as to "retain an active social role in contemporary society closely associated with the traditional way of life, [one] in which the evolutionary process is still in progress."

Corr. ID: 3074

Organization: Sonoma State University

Representative Quote: NPS should follow well-established international policy approach to living, continuing landscapes, as outlined by UNESCO.

At the international level, world heritage management policy is increasingly articulated as the protection of both cultural and natural resources and values, emphasizing local uniqueness and community input into management. For example, UNESCO's 2009 World Heritage Cultural Landscapes: A Handbook for Conservation and Management identifies six guiding principles in its management framework:

- a. People associated with the cultural landscape are the primary stakeholders for stewardship.
- b. Successful management is inclusive and transparent, and governance is shaped through dialog and agreement among key stakeholders.
- c. The value of the cultural landscape is based on the interaction between people and their environment; and the focus of management is on this relationship.
- d. The focus of management is on guiding change to retain the values of the cultural landscape.
- e. Management of cultural landscapes is integrated into a larger landscape context.
- f. Successful management contributes to a sustainable society.

PRNS should explicitly follow these internationally accepted policies in crafting the Ranch CMP, and particularly recognize that the pastoral areas of the Seashore are "continuing landscapes," that they are not only important due to their historic influence on the land, but also due to their current-day uses and continuing influences.

Corr. ID: 3077

Organization: Alliance for Local Sustainable
Agriculture

Representative Quote: To ensure the long-term viability of agriculture in these Districts, we respectfully request that NPS take immediate steps to remove the elk from the PRNS pastoral zone and develop a plan for

managing the ranches in the Historic Ranch Districts that includes:

1. Fencing elk out of the Point Reyes Historic Ranch District;
2. Managing the ranches as part of a UNESCO World Heritage Site "continuing landscape;"
3. With the assistance of the Conservation Study Institute, creating and contracting with a nonprofit corporation, the Board of which includes farm advisors and Marin ranchers, to provide services similar to those provided by the Cuyahoga Valley National Park's nonprofit partner, as described in Dr. Creque's op-ed.

Concern ID:

51884

**CONCERN
STATEMENT:**

One commenter suggested that preservation of the diverse cultural landscape at Point Reyes National Seashore should be given importance equal to preservation of historic structures located at the park.

**Representative
Quote(s):**

Corr. ID: 3022

Organization: University of California
Cooperative Extension

Representative Quote: Cultural Landscapes and Historic Structures. The preservation of local traditions and significant cultural landscapes is an important element of the NPS mission and mandate (Sadin, 2007). The cultural landscape of PRNS encompasses thousands of years of changing land uses. In times past, diversified farms were the norm, including large acreages of row crops and dairy processing. Although Point Reyes agriculture was best known for dairy production in the late 1800s and early-to mid-1900s, between 1935, when the first Marin County Crop Report was issued, and 1942, hundreds of acres of artichokes and peas were grown in what is now PRNS (Livingston, 2009; <http://www.marincounty.org/depts/ag/crop-reports>). The cultural landscape supported diverse farms and ranches that produced most everything that farm families needed to live on, as well as the crops that allowed them to be economically sustainable. Preserving examples of this diverse cultural landscape is every bit as important to the history of the Point Reyes areas, as preserving historic structures.

Concern ID:

51885

**CONCERN
STATEMENT:**

Commenters stated that, without the full support by the NPS regarding requests made by the ranchers within the park, the NPS is contributing to the loss of a cultural resource.

**Representative
Quote(s):**

Corr. ID: 3083

Organization: Lunny Ranch

Representative Quote: Upon reading the PRSRA scoping letter, it is evident that all seashore ranchers are encouraged and excited to see the PRNS focus on preserving the Shafter era agriculture as well. This gives new hope that our ranches and farms will survive as viable businesses into the future. Without giving full support of the points and requests made in the PRSRA letter, NPS will actually be contributing to the elimination of the ranches and the loss of an important cultural resource.

Concern ID: 51886
CONCERN STATEMENT: One commenter asked for prioritization for the preservation of native American cultural sites.
Representative Quote(s): **Corr. ID:** 972
Representative Quote: THE CULTURAL RESOURCES REFERRED TO, ARE THEY NATIVE AMERICAN OR EUROPEAN(FARMING)? PRESERVATION OF NATIVE AMERICAN CULTURAL SITES SHOULD BE PRIORITIZED.

Concern ID: 52193
CONCERN STATEMENT: One commenter suggested that ranchers would provide environmental improvements beyond those required in the leases should be reimbursed through credits on the leases.
Representative Quote(s): **Corr. ID:** 3076 **Organization:** Point Reyes Seashore Ranchers Association
Representative Quote: This EA should also consider the effects on the human environment by evaluating compensation, perhaps via rent reduction, for ecosystem services provided by ranchers. If a rancher, with NPS approval, voluntarily goes above and beyond what is required by agreement for resource conservation, a monetary value can be attached to those services. The ranchers can be reimbursed through credits toward rent. This concept has been used by land managers in other situations. PRSRA believes that this concept could be useful to build collaboration between ranchers and PRNS to further the natural resource conservation and greenhouse gas (GHG) reduction goals of PRNS.

IS1300 - Issues: Natural Resource Management (past, present, and future)

Concern ID: 51890
CONCERN STATEMENT: Commenters stated that the Ranch CMP should consider the value of grazing to preserve and restore native grasslands in the park and in Golden Gate National Recreation Area and to reopen lands previously taken out of agriculture to ranching operations for lease/permit.
Representative Quote(s): **Corr. ID:** 3022 **Organization:** University of California Cooperative Extension
Representative Quote: California grasslands have suffered great losses from development and conversion to other habitat types. In ungrazed grasslands, especially those that abut or intergrade with shrub lands, shrub invasion can result in vegetation type conversion, and thus, loss of the grassland species. Significant acreage has been lost to shrub invasion at PRNS in areas where grazing has been removed. We encourage PRNS to reopen lands to agriculture within the pastoral zone and Golden Gate National Recreation Area (GGNRA) that have been taken out of production in recent years. Not only would this provide more acreage for PRNS ranching families, it would allow restoration of open grassland habitat that has been converted to shrublands:

http://www.elkhornsloughctp.org/uploads/files/1184014268Nothern_Coastal_Scrub_Coastal_Prairie.pdf;
http://www.elkhornsloughctp.org/reference/subissue_detail.php?SUBISSUE_ID=4

Ranchers and their livestock have been and continue to be the most effective vegetation managers working on PRNS lands. Livestock grazing, under the management of highly experienced specialists (the ranchers) maintain grassland vegetation and prevent type conversion to shrublands, and are responsible for maintaining habitat conditions required by many special-status species. Unlike native tule elk, domestic livestock numbers and grazing patterns are controlled by their managers to meet economic and resource management objectives:
<http://ucanr.org/sites/uccemarin/files/31000.pdf>

Concern ID: 51887
CONCERN STATEMENT: Commenters stated that the natural resources present in the park should be protected and preserved.
Representative Quote(s): **Corr. ID:** 17 **Organization:** Former Parks and Open Space Commissioner

Representative Quote: Where there needs to be a way for ranchers to coexist with the NPS, I think the health of the parks and its natural resources (both plant and animal) should come first.

Corr. ID: 3045
Representative Quote: As a professional wildlife biologist, recreational bird watcher, and local resident, I would like the National Park Service and ranchers using park lands to carefully manage and protect habitat for birds and other wildlife and to abide by federal and state laws that protect nesting birds on ranch (and all other) lands within the Park.

Concern ID: 51888
CONCERN STATEMENT: Commenters indicated that natural resources management cannot be applied within the cultural landscape in the same way that this management is applied elsewhere in the park and suggested that the Ranch CMP include a discussion of how natural resources management will be dealt with on agricultural lands.

Representative Quote(s): **Corr. ID:** 2988
Representative Quote: Some discussion of how the Ranch CMP will deal with possible conflicts between natural resource management and agricultural practices on the several individual ranches, each of which is an element in an important cultural resource with standing equal to the Seashores natural resources. This section should be explicit that, if agriculture is to exist in the Seashore, NPS policies on biological resource management can not be applied in a cultural landscape in exactly the same way as in other areas of the Seashore.** For example, grazing cattle, growing and harvesting grasses for silage, and various forms of rangeland maintenance are all activities that are inappropriate in other areas of the Seashore but are routine agricultural practices necessary for ranches to

function. To expand on one of those examples, silage is important economically for ranchers and lowers carbon footprint compared to trucked in feed but involves soil and vegetation alteration that would not normally occur in a national park, is a potentially a negative for some wildlife species (nesting grassland birds, for example), and benefits some other species (some wintering bird species, for example).

ISI400 - Issues: Tule Elk Management on Ranchlands (past, present, and future)

Concern ID: 51893

CONCERN

STATEMENT:

Several commenters stated that ranchers do not have the right to impact the elk and provided reasons for elk to remain in the area, including: they are the native grazers and belong in the area, they serve an important role to the ecosystem, they represent an important species to conservation history, the land belongs to the public and to the wildlife, and the elk resided in this area long before people. These commenters also expressed concern that ranching activities are impacting the elk and that threats exist to their health if they are not properly managed.

Representative

Quote(s):

Corr. ID: 20

Representative Quote: The situation concerning Tule Elk and cattle ranchers in the Point Reyes National Seashore (PRNS) should be one of no debate. Tule Elk are a flagship species for the ecosystems of which they reside, and a significant symbol in regards to species conservation. They have been found historically in PRNS for many generations before ranchers have ever settled in the area, and in fact were once driven to local extinction in the Pt Reyes area due to cattle ranching.

Corr. ID: 20

Representative Quote: The idea of putting ranchers before the flora and fauna of PRNS, as well as the consideration of allowing hunting of Tule Elk anywhere on PRNS is a major contradiction to the National Parks Service mission statement. If ranchers are put before Tule Elk, it will be a major setback in species conservation, as well as an atrocity to the National Parks Service.

Corr. ID: 1015

Organization: Tule Elk foundation

Representative Quote: Tule Elk should be the #1 priority on National Park/National Seashore lands (NPS). If Tule Elk are not fully protected on National Park lands, then where will Tule Elk be protected in the State of California? Just a reminder, that Tule Elk (*Cervus Canadensis nannodes*) once numbered 500,000 throughout their native habitat in California. Tule Elk now number only about 4,000 in California. With the long-term concerns of the genetic health of the Tule Elk- every elk population is critical for the long-term health and viability of Tule Elk statewide. One of the important traits of Tule Elk is their incredible "adaptability" to changes in their environment but that adaptability has its limits especially as the Tule Elk are "managed" by humans. The Tule Elk's long-term health is dependent

upon free-roaming populations that live 'unimpaired by human influence'.

Corr. ID: 1022

Organization: In Defense of Animals

Representative Quote: Tule elk are not affecting park ranch operations, but vice versa, privately-owned ranch operations within the PRNS affect tule elk in that they prevent tule elk from migrating freely and from occupying those areas they prefer within the pastoral zone.

Corr. ID: 1038

Organization: The Wildlife Trust

Representative Quote: Much is made by today's PRNS commercial leasees and permittees of the "historic" cattle grazing that has taken place on the Pt. Reyes peninsula over the last couple of hundred years. However, it must be understood that the real historic grazers in this area and over much of the rest of California are tule elk, along with deer and pronghorn antelope. For at least 10,000 years, even before the Coast Miwok arrived, tule elk have grazed the grasslands of California, including the coastal prairies and brush-fields of what has become Pt. Reyes National Seashore thousands of years later. This historic grazing by tule elk has been constant except for the relatively short period in the 1800s and 1900s, when market hunters and ranchers eliminated them from the most of California, including along the Coast.

Concern ID:

51894

**CONCERN
STATEMENT:**

One commenter discussed the status of the tule elk as an "umbrella" species that represents long-term restoration efforts in California that should be given priority over cattle grazing. The same commenter described the reintroduction of the elk to Tomales Point as a historical note to the restoration of the species and to the future of restoration ecology in general.

**Representative
Quote(s):**

Corr. ID: 1015

Organization: Tule Elk foundation

Representative Quote: The NPS should also consider its historical role and involvement in the early 1970's as a key stakeholder in the reintroduction of Tule Elk into Point Reyes National Seashore. According to your website statement and the historical record: "State and Federal legislation in the early 1970's, authorized the California Department of Fish and Game (now the Cal Dept of Fish & Wildlife), in cooperation with the U.S. Fish and Wildlife Service and the National Park Service, to reintroduce the extirpated Tule Elk to Tomales Point. As a result, 10 animals (8 females and 2 males) were transplanted from an existing reintroduced herd in the San Luis National Wildlife Refuge near Los Banos to a 2,600 acre fenced enclosure on Tomales Point in 1978." (http://www.nps.gov/pore/naturescience/tule_elk.htm)

These initial historical restoration efforts were an essential step in restoring the Tule Elk as a public good and a part of the Public Trust Doctrine movement. These early pioneers and the dedicated efforts to restore the native California landscape were instrumental in the eventual public policy and practices of restoration ecology, landscape ecology, ecosystem management, sustainable studies and wildlife science. These newly practiced

disciplines are now widespread throughout the outstanding academic institutions within California and nationwide. Students and the public embrace and support these practices as "core" to the mission of National Parks, State Parks and other public lands. These practices are also being adopted on private lands. This vast movement supports the Public Trust Doctrine that wildlife are held in trust for present and future generations.

Corr. ID: 1015 **Organization:** Tule Elk foundation
Representative Quote: Tule Elk, a California endemic species, are considered an "umbrella" or focal species for North America. Tule Elk represent the long-term efforts by the State of California, Federal Government (Tule Elk Preservation Act of 1976), the public and non-profits to restore this large free-roaming native herbivore to the landscape over the last nearly 80 years. The reintroduction of Tule elk may be one of the largest restoration efforts in the history of California and possibly the nation.

Since the original efforts to reintroduce Tule elk throughout its native habitat over nearly 80 years - the citizens of California, leadership and resource agencies are at a crossroads! When will Tule Elk take priority over European cattle/dairy grazing practices- which were integral in destroying much of the native landscape of California? Cattle/dairy operations still dominate the California native landscape - found throughout California and as well as nationwide. Our National lands, and specifically restricted-use lands such as a National Park, must be a safe haven for free-roaming Tule Elk in California! And we are only talking about ONE National Park within California where free-roaming Tule Elk ARE NOW FOUND (only since 1998- a mere 16 years)!

Concern ID: 51896
CONCERN STATEMENT: Several commenters stated that elk are threatening ranchers' ability to raise quality food and meet consumer demand with impacts that include: damage to fences, damage to water sources, damage to irrigation lines, spread of disease, impacts to grazing and native pastures, impacts to organic forage and certifications, and threats to the economic survival of ranches due to costs incurred from elk impacts.

Representative Quote(s): **Corr. ID:** 24
Representative Quote: I'm aware of the problems with the Tule Elk and its a massive burden (cost, property damage, etc.) on ranchers now because of the increase in the Tule Elk population. The price of hay and feed is double or triple what it typically is because of the drought and the Elk on property is like having extra livestock without the revenue of milk or meat.

Corr. ID: 1029 **Organization:** U.S. Congress
Representative Quote: The successful return of the majestic elk to the Point Reyes National Seashore is good for park visitors and speaks to the health and abundance of the park's natural environment- but the growing number of elk taking up permanent residence on working ranches and dairies, mingling with cattle and potentially acquiring and spreading cattle-borne

diseases, damaging fences and equipment, and competing with cows for carefully managed organic forage on ranch lands is a serious problem for ranchers now and will certainly lead to impairment of historic values of the working ranches .

Corr. ID: 3022

Organization: University of California
Cooperative Extension

Representative Quote: We are also pleased to see PRNS acknowledge that lack of appropriate tule elk management in the PRNS pastoral zone threatens the economic survival of ranches.

Concern ID:

51897

CONCERN

One commenter stated that claims of calf goring by elk are unsubstantiated.

STATEMENT:

Representative

Quote(s):

Corr. ID: 1010

Representative Quote: Claims of bull elk goring calves are unsubstantiated.

Concern ID:

51899

CONCERN

Commenters stated that the exponential growth of the elk population in the absence of hunting and predation, which historically kept the population under control, is a problem that is likely to destroy natural habitat.

STATEMENT:

Representative

Quote(s):

Corr. ID: 1039

Representative Quote: When it does come to the new management plan, exponential growth of elk population in the absence of their natural predators is a serious problem that has been encountered in many other parks where they have been introduced, and it is likely to destroy not only the PRNS ranches but much of the natural habitat as well. I do not know of a humane yet practical solution to this problem, and it is one that has never been adequately addressed by the Park. Another sharpshooter rampage to deal with it when it reaches catastrophic proportions would certainly not go down well with the public, besides being very expensive.

Corr. ID: 3019

Representative Quote: It seems the National Park System was willing to introduce this form of wildlife to seemingly bring back biodiversity of years past, but without the willingness to allow for the cycle of life. If elk truly inhabited Point Reyes Peninsula generations ago, then I am sure the farmers and ranchers hunted them without much regulation (as this has not always been public property) which created a healthy check and balance of the population. Obviously, today, the elk are being protected by the park and have only one true predator, the coyote to worry about. At this same time, the populations of elk are not under any sort of control regarding where and when they roam through the various properties.

Concern ID:

51900

CONCERN

One commenter questioned background information provided in scoping materials, indicating that ranchers and the public had raised concerns related to tule elk and their impacts on ranch operations.

STATEMENT:

*Representative
Quote(s):*

Corr. ID: 964

Representative Quote: In the Background information for scoping comments it states, "Ranchers and the public have raised concerns related to tule elk and their impact on current ranch operations." What numbers of public have raised these concerns and what exactly were the concerns?

*Concern ID:
CONCERN
STATEMENT:*

51901

[One commenter noted that, prior to 2002, the NPS managed elk following the 1998 Elk Management Plan to avoid harm to other permitted uses, but in 2002, this management ceased.](#)

*Representative
Quote(s):*

Corr. ID: 3092

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: The 1998 Elk Management Plan recognizes the fact that introduced tule elk can become invasive and have the potential to adversely affect seashore resources, including cattle. The plan is clear that PRNS is to manage the elk so that they do not harm any other permitted use within the seashore. To manage the expected elk proliferation and to avoid harm to other permitted uses, the plan allows the PRNS and CDFW to use capture and relocation of wayward elk, contraception of elk, and even lethal culling. For the first several years following the 1998 public process and plan approval, PRNS utilized all of these approved tools to manage the elk and kept them off the pastoral zone. During these years there was no controversy because everyone interpreted the plan the same way. The contraception program appeared to be hugely successful (see Science & Conservation Center letter, Attachment C). When a rogue elk appeared on a ranch, the rancher called the seashore staff and the animal was tranquilized and brought back to the designated elk range. In at least one case, a repeat intruder was shot and killed by PRNS. The PRNS was quite clear, and understood their responsibility when they looked back at 2001 in the PRNS publication Point Reyes National Seashore 2001 Year in Review (attachment D) where PRNS stated Since their release, the new herd has been carefully monitored to ensure animals remain within Seashore boundaries, do not interfere with cattle ranches within the park and are not shedding the organism that causes Johnes disease. (emphasis added) Unfortunately, and still without explanation, sometime around 2002, PRNS ceased management of the tule elk. Contraception ceased. Relocation ceased. Culling ceased. At the time tule elk management ended, PRNS began to allow tule elk to proliferate in the pastoral zone and harm the ranchers- -the very permitted use the plan set out to protect.

*Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):*

51902

[One commenter stated that a map being used in the current Ranch CMP materials is misleading because it does not include the designated elk range.](#)

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: The 1998 Elk Management includes a map that clearly describes, with a distinct line around the perimeter, the 18,000 acre designated elk range. The 1998 plan states that the PRNS would establish the

free ranging elk herd within those 18,000 acres. This range intended for the elk does not include any ranch land and is fully located within the Limantour wilderness area. The current CMP EA materials include a similar map showing where the elk currently exist, but now excludes the designated elk range. This is misleading. The public may not know that the elk have been allowed to proliferate outside the limits of the designated elk range found in the current elk management plan. By failing to include the designated elk range in the map, the public has not been properly informed to provide meaningful comments on the EA. The PRNS, its contractors and its experts must consider the fact that the public was given this misleading map prior to commenting.

Concern ID: 51903

CONCERN STATEMENT: One commenter noted that there is no research indicating that elk are eating grass needed by cattle, and there is therefore no valid claim by the ranchers that they are being put out of business by elk grazing in the area.

Representative Quote(s):

Corr. ID: 3009

Representative Quote: I do not believe there is any research showing that the elk are actually taking away grass that needs to be eaten by the cattle. Thus, the claim that the elk will be putting the ranchers out of business is only an idea. I understand that in one area there is a very large herd, and that perhaps this herd is more likely to actually do some 'damage' to the pastureland. On the other hand this herd stays at least part of the time in ranchlands that had used to belong to a ranch which is closed.

IT1000 - Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries)

Concern ID: 51906

CONCERN STATEMENT: Commenters noted that the Ranch CMP should address the impacts of ranching operations including changes to soil compaction and structure, soil erosion, soil biology, increased nitrogen deposition, surface and subsurface water quality, contribution to GHG emissions, waste disposal, and an increase in invasive species.

Commenters stated that BMPs should be evaluated for soil management, topsoil preservation, and prevention of erosion. One commenter noted that previous efforts to protect from these impacts involved annual measurements of residual dry matter. One commenter stated that the Ranch CMP should describe the current conditions of water quality and quantity in the project area and evaluate consistency with the Organic Act providing "maximum protection, restoration, and preservation" to natural resources, and consider various published sources of information including a paper discussing off-stream water sources and erosion for cattle.

Representative Quote(s):

Corr. ID: 964

Representative Quote: Cost to soil structure, erosion and contamination with nitrogen

Greater nitrogen availability will alter patterns of succession and ultimately favor invasion by other non-native species that thrive on nitrogen rich soil.& invasive weeds are now the single greatest threat to natural ecosystems in the western United States. [CA Exotic Pest Council Newsletter, Vol 3, No.3 1995]. Recall the millions of pounds of nitrogen waste that livestock put on the ground every year. Invasives are promoted as well by soil disturbance and alteration of soil microbes which evolved with native plants and which are disrupted by trampling, plowing and removal of native plants, all of which have occurred and continue to occur every day in the Pastoral Zone.

Corr. ID: 964

Representative Quote: Soil erosion in the livestock pastures is evident even from the main road, with bare slopes and gullies evident. The soil is sufficiently trampled and compacted that plants are unable to grow in wide swaths of cattle trails and standing areas. This photograph from March 2014 shows the compacted soil, exotic grasses, and in the background a field of cultivated crops.

Corr. ID: 965

Representative Quote: As vice-chair of the GGNRA-Point Reyes Advisory Commission (CAC) for its entire 29 years, I heard testimony from time to time about over-use and erosion of the Seashore's grazed lands, and about efforts to protect their health by annual measurements of "residual dry matter" (RMD). The CAC also gave advice about the re-introduction of tule elk, and was somewhat informed about the expansion of the herd and Johne's disease. However, the CAC was "sunsetting" in 2002, and what I know of this now is only updated from the information sheet about this Ranch CMP. I note there is no mention of RMD.

Corr. ID: 1010

Representative Quote: Water resources. The Park Service should discuss the water resources in the ranching areas. It also should discuss whether they are in good condition. If they are not in good condition, the Park Service should discuss what needs to be done to remediate the impairment of natural values and provide them with "maximum protection, restoration and preservation" as required by the park's enabling legislation and the Organic Act.

In this regard, the Park Service should discuss whether livestock should be fenced out of water courses and wetlands. Doing so would prevent their hooves from causing erosion by damaging the banks and beds of streams and would reduce the amount of cattle urine and feces that contaminate the streams. Water troughs can be used to provide water to the cattle away from the watercourse. The same discussion should be had as to ponds. Troughs can be provided at a reasonable distance from the ponds. For a paper that discusses providing cattle with water sources away from streams and ponds, see: "Developing Off-Stream Water Sources," Ron Sheffield, North Carolina State University, attached hereto as Exhibit 2. A copy of this paper

is available on-line at www.bae.ncsu.edu/topic/animal-waste-mgmt/program/cattle/developing-off-stream-water-sources.pdf

Corr. ID: 1055 **Organization:** Western Watersheds Project
Representative Quote: Primary grazing can lead to soil compaction, massive soil erosion, and sediment flows into streams, which will harm the fisheries habitats, fish, and aquatic invertebrates in those habitats. The environmental review should consider grazing impacts to all soils in the pastoral zone whether these are in primary, secondary, or incidental use areas.

IT1100 - Impact Topic: Water Quality and Quantity
Concern ID: 51907

CONCERN STATEMENT: Commenters stated that the Ranch CMP should assess and describe direct, indirect, and cumulative impacts of ranching operations to water resources resulting from point source and non-point source runoff of contaminants into Tomales Bay, Drakes Estero, tributaries, stock ponds, and other surface waters throughout the area, noting that nitrates and microbial pathogens (such as fecal coliform bacteria) are of particular concern.

The Ranch CMP should set water quality standards and develop an ongoing monitoring plan to provide data for adaptive management of BMPs. This plan should include: setting goals for contaminant loading from cattle operations; assessing ways to control both point source and non-point source impacts; explaining how "top priority" tributaries are determined; explaining how water quality is assessed; and developing a cumulative watershed effects analysis that includes an explanation of past survey efforts.

Representative Quote(s):

Corr. ID: 792
Representative Quote: In addition to sediment transport, cattle production involves numerous other potential water contaminants ranging from nutrients such as nitrates to microbial pathogens. Part of the CMP should include monitoring programs for proximate surface waters (especially sheltered lagoons and esteros like Abbott's, Drake's, and Limantour) in addition to Tomales Bay in the area of L Ranch and the setting of goals for contaminant loadings from cattle operations.

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: Water quality standards should be set for stock ponds. Ponds should be regularly monitored for water quality, and implementation plans with timelines should be developed to ensure adequate water quality.

Corr. ID: 964
Representative Quote: Results of water quality monitoring for Tomales

Bay and its main tributaries indicate that these waters exceed bacteria water quality objectives for shellfish harvesting and recreational waters and, as such, are impaired by pathogens. Tomales Bay itself is not part of PRNS but it receives runoff from its Pastoral Zone and serves as an example of nonpoint-source pollution. The presence of pathogens is inferred from high concentrations of fecal coliform bacteria. Has the runoff from PRNS into Tomales Bay been assessed and is it being monitored? Is this data available to the public?

[http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/bp_ch7c.shtml]

Visitors to the lagoons in PRNS are warned about the water quality: "Rainfall runoff and stream flow from surrounding agricultural areas flows into the lagoons potentially carrying harmful bacteria with it."

[<http://www.nps.gov/pore/planyourvisit/beaches.htm>]

Corr. ID: 1055 **Organization:** Western Watersheds Project
Representative Quote: The NPS should conduct a cumulative watershed effects analysis for the watersheds in the project area and should present this data in the NEPA documents. The Ranch CMP should also discuss the measures that will be taken to eliminate or reduce any effects. The documents should disclose when, and how many, surveys have been conducted in these watersheds and whether or not these field surveys suggested upgrading the risk of cumulative watershed effects in the affected watersheds. The documents should consider the cumulative impacts of past, present, and future projects (including those on private land) within these watersheds and discuss ways to minimize or eliminate these impacts.

Cattle can severely impact water quality (Derlat et al., 2010) and livestock grazing and operations are significant sources of nonpoint pollution. The NPS must consider the impacts of the proposed action and each alternative on water quality, and address how it will control nonpoint source pollution.

Corr. ID: 2996 **Organization:** San Francisco Bay Regional Water Quality Control Water Board

Representative Quote: Evaluation of the water quality impacts of grazing and dairy operations on receiving waters within the Project area (e.g., Tomales Bay, creeks, other waterbodies, and groundwater). This evaluation should include the development of an on-going water quality monitoring program specifically designed to provide data for adaptive management of BMPs and related grazing and dairy operational practices. The goals of the monitoring program should provide relevant information on: 1) the water quality within the NPS RCMP area, 2) effectiveness of BMPs installed to protect water quality through an assessment of BMP performance and adaptation , and 3) how the water quality data collected will be used to adaptively manage site operations.

Corr. ID: 2996 **Organization:** San Francisco Bay Regional Water Quality Control Water Board

Representative Quote: Specifically, we request that you evaluate the bacteriological water quality impacts associated with cattle being grazed near, or allowed direct access to creeks where they sometimes linger: The

NPS has prioritized and completed actions on the top priority tributary to Olema Creek. We note however, that cows still gain access to creeks in several tributaries not identified as "top- priority" tributaries. It isn't clear how the NPS determined what constitutes a "top priority" and if it has evaluated the water quality impacts of having cows in the "lower priority" tributaries.

IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas

Concern ID: 51916

**CONCERN
STATEMENT:**

Commenters stated that ranchers at the park have in the past and are currently using measures to reduce impacts to floodplains, wetlands, and riparian areas, including: using buffers for water quality protection and sensitive riparian areas; enhancing habitat in sensitive riparian and wetland areas; and committing under the existing status quo to continue their partnerships with agencies and organizations to reduce negative environmental impacts.

**Representative
Quote(s):**

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: Habitat enhancement. PRSRA members have been working and will continue to work with NRCS, RCD and NPS to enhance habitat in sensitive riparian and wetland areas. PRSRA is not aware of any PRNS plan to change the existing PRNS/PRSRA collaborations. If NPS has a proposal to change the existing baseline with new requirements or restrictions it should make that proposal available to the public so that meaningful comments can be given. If NPS does not have a proposal to change the status quo, PRSRA will continue to collaborate with the agencies to enhance sensitive habitats and no evaluation is necessary in this EA.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: Buffers for water quality protection. PRSRA members have been working and will continue to work with NRCS, RCD and NPS to establish appropriate buffers for sensitive riparian areas. PRSRA is not aware of any PRNS plan to change the existing protections. If NPS has a proposal to change the existing baseline with new restrictions it should make that proposal available to the public so that meaningful comments can be given. If NPS does not have a proposal to change the status quo, PRSRA will continue to collaborate with the agencies to protect sensitive habitats and no evaluation is necessary in this EA.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: 3) Floodplains, Wetlands, Riparian Areas
PRSRA is unaware of any new ranching or farming activities requested within floodplains, wetlands or riparian areas. The ranching and farming activities that may be occurring within these areas have been part of the environmental baseline for around 150 years. PRSRA ranchers, in

collaboration with NPS, NRCS, RCD and others have made many modifications over the years to reduce impacts to these important areas. PRSRA commits to continuing its partnership with agencies and organizations with the goal of reducing negative environmental impacts to floodplains, wetlands and riparian areas. Any existing (current environmental baseline) effects should be excluded from this process. NEPA requires a federal agency to evaluate only new effects that have the potential of altering the status quo.

Concern ID:

51914

**CONCERN
STATEMENT:**

Commenters stated that past, present, and future direct and indirect impacts to riparian areas, aquatic features, and developed waters (such as increased sediments, increased levels of fecal coliform bacteria, changes to hydrology, breakdown of streambanks, disturbance of streambeds, degradation of riparian vegetation, changes to nutrient cycling, and thermal effects) should be analyzed, including creating maps of the resources and documenting the current condition of the water resources. Mitigation to stabilize and restore streambanks, to monitor water quality against performance standards, and to restore riparian areas, including the establishment of buffer areas, should be developed. Impacts from water supply development should be assessed. A mitigation, restoration, and monitoring plan and timeline to achieve water quality standards should be presented. Commenters noted that cattle should be prohibited from entering water resources, and runoff from ranch operations should be eliminated.

**Representative
Quote(s):**

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: Restoration of creek banks and riparian zones negatively impacted by former or current ranch operations should be identified and restoration plans with timelines should be developed and implemented.

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: Science-based setbacks from riparian habitat and streams should be established to ensure the ecological functions provided by these habitats. Habitat supporting ESA listed species should be considered for enlarged and protected buffers. Current and former structures within these buffers should be identified and plans with timelines should be developed and implemented to remove or mitigate for any negative impacts.

Corr. ID: 1032

Representative Quote: Floodplains, wetlands, Riparian Areas:

livestock must be kept out of watercourses and wetlands, yet barriers must allow wildlife access. Runoff from dairies must be channeled away from wetlands and watercourses, especially in winter when the rains can allow contained animal waste to run into watercourses and wetlands.

Corr. ID: 1055

Organization: Western Watersheds Project

Representative Quote: The NEPA documents should include maps showing all riparian areas, meadows, special aquatic features, and developed waters. The NEPA documents should fully document the condition of these important areas including water quality, and document any prior impacts and measures that have been taken to mitigate these impacts so that the public and the decisionmaker can evaluate the likely effectiveness of the proposed action.

Direct effects of grazing on riparian areas include increased sediment deposition in streams, water quality impacts such as elevated levels of fecal coliform bacteria, head-cutting and localized changes in hydrology, breakdown of stream banks, disturbance and/or destruction of streambeds, destruction of riparian vegetation, and impairment of the ability of riparian vegetation to recover. Indirect effects include alteration of fire intervals which affect plant reproduction, changes to microenvironments including nutrient cycling and thermal effects, and increase risks for spread and establishment of invasive species.

Corr. ID: 2996 **Organization:** San Francisco Bay Regional Water Quality Control Water Board

Representative Quote: Specific Areas of Concern that will be addressed in the NEPA document will require additional evaluation, review, and assessment including:

a. Potential impacts of water supply development (e.g., rings, new ponds (if anticipated), etc.) on riparian vegetation, wetland recharge, and downstream creek flows.

Corr. ID: 2996 **Organization:** San Francisco Bay Regional Water Quality Control Water Board

Representative Quote: Potential impacts to riparian zones and how these areas will be managed to prevent their degradation. Your review and evaluation should provide vegetation, bank stability and water quality performance standards related to fencing grazing animals (e.g., cows) out of riparian corridors and should describe the final state of riparian zone habitat to be protected (e.g.; grasses or full riparian).

IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed)

Concern ID: 51919

CONCERN STATEMENT: [One commenter stated that livestock grazing has been shown to be compatible with, or to enhance, the habitat for a significant number of special-status grassland species on park lands.](#)

Representative Quote(s): **Corr. ID:** 3022 **Organization:** University of California Cooperative Extension

Representative Quote: Species of Special Concern. PRNS lands that are grazed support numerous species of special concern. As described in The Changing Role of Agriculture in Point Reyes National Seashore (see previous link), livestock grazing has been shown to be compatible with, or to

actually enhance the habitat for a significant number of special-status grassland species on PRNS lands.

Concern ID: 51917

CONCERN STATEMENT: Commenters provided a list of species they felt should be considered in the development of the Ranch CMP and requested that the plan include: a discussion of the endangered and threatened animals and plants that exist in the grazing areas; the threats to them in those areas from cattle and other causes; an assessment of potential direct, indirect, and cumulative impacts from the implementation of the Ranch CMP to the species; and how the Ranch CMP will remediate impairment. They also requested that critical habitat be designated within the pastoral zone and that these areas be removed from the pastoral zone. One commenter stated that the Ranch CMP should provide maximum protection to federal and state listed wildlife and plant species and their habitats.

Representative Quote(s):

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: Any area designated as "critical habitat" for a federally listed species should be evaluated for removal from the pastoral zone, unless there is site-specific data showing that carefully managed livestock grazing is compatible with the protection and recovery of the species.

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: Protect endangered species habitats

A priority on our national parkland should be protection of native ecosystems and wildlife. The RCMP should provide maximum protection for wildlife and plants listed under the federal and state Endangered Species Acts as endangered, threatened or a "species of special concern"

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: The NPS should identify and map all habitats for protected species at PRNS, as well as protective buffers needed to maintain ecological function for their suitable habitat, and provide maximum protection for these habitats. These protections should include: removing important habitat areas from the designated pastoral zone if needed, exclusionary fencing to protect sensitive habitats from livestock, reduced stocking levels of livestock in overgrazed areas, and removal and control of invasive species.

Corr. ID: 964
Representative Quote: Another special status species, the western snowy plover, has been affected by cattle, which trample nests, crushing eggs, and flush birds from nests [U.S. Fish and Wildlife Service 1995 in http://www.westernsnowyplover.org/pdfs/WSP_Final_RP_10-1-07.pdf]. This

plover's diminished numbers are largely due to habitat disturbance, degradation due to invasive species, and predation.

Corr. ID: 964

Representative Quote: Plant Conservation Targets by the Conservation Land Trust include these coastal grassland plants that occur at PRNS and for which cattle grazing is listed as a threat: Point Reyes bird's-beak, *Cordylanthus maritimus* ssp. *palustris*, Sonoma alopecurus *Alopecurus aequalis* var. *sonomensis*, Tidestrom's lupine *Lupinus tidestromii*, and a second species of spineflower, *Chorizanthe cuspidata* var. *villosa* the woolly-headed spineflower. The Center for Plant Conservation lists cattle grazing as a threat to *Cordylanthus maritimus* ssp. *palustris*, citing the California Natural Biodiversity Database.

[http://www.centerforplantconservation.org/collection/cpc_viewprofile.asp?CPCNum=1055]

For the *Alopecurus* grass, the Fish and Wildlife Service reports "The numbers of populations of this species are declining due to competition from invasive plant species, trampling and grazing by cattle....".

[<http://www.cdpr.ca.gov/docs/endspec/estext/fr102297.txt> page 54793].

Both the threats of invasive plants and of trampling are conditions exacerbated in the Pastoral Zone. The Encyclopedia of Life states that *Chorizanthe cuspidata* "var. *villosa* is threatened by grazing".

[<http://eol.org/pages/584498/details>] The Federal Fish and Wildlife Service states that "trampling by livestock may contribute to the endangerment of *Lupinus tidestromii*". The invasion by alien plants is again mentioned as a negative factor on the plants it is listing as endangered.

[<http://www.cdpr.ca.gov/docs/endspec/estext/fr062292.txt>]

Corr. ID: 964

Representative Quote: There are over 50 imperiled plants at Point Reyes. For example, the Sonoma spineflower, *Chorizanthe valida*, is now present in only 3 locations, all in Point Reyes, according to the records of the California Natural Diversity Database, which notes that cattle grazing is a threat to these occurrences.

[<http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>] This photograph of the Sonoma spineflower is from Davis and Sherman, 1992:

showing cattle-grazed plants on the left and an ungrazed plant on the right. The authors note that "most plants in the non-grazed population were 3-4 times taller, had many more inflorescences and greater crown diameters than the plants in the grazed population." The authors concluded that the species does not compete well with invasive plants. Since agricultural operations and especially livestock grazing increase and maintain the disturbance that facilitates invasive species, what are the National Park Service's actions to increase the vigor and populations of this imperiled plant?

Corr. ID: 1010

Representative Quote: Endangered and Threatened Animals and Plants.

The Park Service should discuss endangered and threatened animals and plants that exist in the grazing areas, the threats to them in those areas from cattle and other causes, and how it will remediate the impairment and "achieve maximum protection, restoration and preservation" of them as part of the "natural environment within the area" as required by the park's statute.

Corr. ID: 1038

Organization: the Wildlife Trust

Representative Quote: Establish critical habitat in PRNS for all threatened and endangered species of plants and animals listed under the California and Federal Endangered Species Acts:

Unfortunately, there are now approximately 292 species of non-native exotic plants within PRNS, including a wide variety of non-natives within the Pastoral Zone. Over 50 plants at PRNS are currently listed by the Federal government, State government, or the California Native Plant Society as being rare, threatened, or endangered. The required establishment of critical habitat for the listed threatened and endangered species is vital to their recovery at PRNS in general and within the Pastoral Zone in particular.

Corr. ID: 1055

Organization: Western Watersheds Project

Representative Quote: Like most of the park, the pastoral zone provide habitat for an enormous number of rare wildlife, plant species and plant communities. The California Natural Diversity Database ("CNDDDB") includes the following animal species many of which will be affected by the Ranch CMP:

- , tricolored blackbird
- , pallid bat
- , Point Reyes mountain beaver
- , great egret
- , great blue heron
- , burrowing owl
- , Tomales isopod
- , Marin elfin butterfly
- , western snowy plover
- , sandy beach tiger beetle
- , northern harrier
- , globose dune beetle
- , Townsend's big-eared bat
- , black swift
- , monarch butterfly
- , yellow warbler
- , western pond turtle
- , tidewater goby
- , tufted puffin
- , saltmarsh common yellowthroat
- , Peninsula coast range shoulderband
- , Ricksecker's water scavenger beetle

- , San Francisco forktail damselfly
- , silver-haired bat
- , western red bat
- , hoary bat
- , California black rail
- , Tomales roach
- , coho salmon - central California coast ESU
- , steelhead - central California coast DPS
- , osprey
- , Point Reyes blue butterfly
- , foothill yellow-legged frog
- , California red-legged frog
- , Myrtle's silverspot butterfly
- , longfin smelt
- , California freshwater shrimp
- , American badger
- , Marin hesperian
- , Point Reyes jumping mouse

(see full comment for scientific names)

Livestock grazing and grazing related infrastructure may directly, indirectly and cumulatively impact all these animal species. Impacts include direct trampling and disturbance, habitat disturbance, loss of cover, changes in shrub density, loss of prey species, and changes in hydrology and water quality. Field research has shown that light to moderate grazing reduces rodent densities and diversity, rodents are important prey items for many of these species (for examples see Jones 2000; Moser and Witmer, 2000; Ward & Block 1995).

Corr. ID: 1055 **Organization:** Western Watersheds Project
Representative Quote: The CNDDDB includes the following rare plant species most of which will be affected by the Ranch CMP:

- , pink sand-verbena
- , Blasdale's bent grass
- , Sonoma alopecurus
- , Napa false indigo
- , Marin manzanita
- , coastal marsh milk-vetch
- , Point Reyes blennosperma
- , Thurber's reed grass
- , coastal bluff morning-glory
- , swamp harebell
- , seaside bittercress
- , bristle-stalked sedge
- , Lyngbye's sedge
- , Tiburon paintbrush
- , Point Reyes paintbrush
- , Mt. Vision ceanothus

, Point Reyes salty bird's-beak
 , San Francisco Bay spineflower
 , woolly-headed spineflower
 , robust spineflower
 , Sonoma spineflower
 , Bolander's water-hemlock
 , Franciscan thistle
 , western leatherwood
 , supple daisy
 , bluff wallflower
 , Marin checker lily
 , fragrant fritillary
 , blue coast gilia
 oliata, dark-eyed gilia
 , white seaside tarplant
 , short-leaved evax
 , Marin western flax
 , Kellogg's horkelia
 , Point Reyes horkelia
 , Baker's goldfields
 , perennial goldfields
 , beach layia
 , coast yellow leptosiphon
 , rose leptosiphon
 , Mason's lilaeopsis
 , coast lily
 , Point Reyes meadowfoam
 , Tidestrom's lupine
 , marsh microseris
 , northern curly-leaved monardella
 , North Coast phacelia
 , Point Reyes rein orchid
 , North Coast semaphore grass
 , Marin knotweed
 , California beaked-rush
 , Point Reyes checkerbloom
 , Marin checkerbloom
 , purple-stemmed checkerbloom
 , Mount Tamalpais bristly jewelflower
 , showy rancheria clover
 , San Francisco owl's-clover
 , coastal triquetrella
 (see full comment for scientific names)

These plants are susceptible to being eaten by cattle, being trampled by cattle, and to modifications of local hydrology and localized soil compaction induced by cattle and livestock operations and infrastructure.

In order to comply with NEPA, the Forest Service needs to perform a site-

specific review and analysis of the effects of the proposed action and alternatives on all these plant and animal species. This should include documentation of all recent surveys. The NPS should ensure that adequate safeguards are in place in the Ranch CMP to protect these species and their habitats and that any impacts to them are adequately mitigated. The NEPA analysis should include consideration of the direct, indirect and cumulative effects of the proposed action on these rare plants and their habitat.

Corr. ID: 3045

Representative Quote: According to BNA, early-season mowing of hayfields and other agricultural lands is generally responsible for major nest failure of grassland birds, including Grasshopper Sparrows and, in general, contemporary farming practices involve cutting hayfields more frequently, and earlier, in spring than 50 years ago; these practices have had significant negative impacts on nesting success of grassland birds (Rodenhouse et al. 1995). Population decline of Grasshopper Sparrow and many grassland birds has been recognized as a national and regional conservation priority (Knopf 1994, Vickery et al. in press). Habitat loss, initially of native prairies and grasslands but subsequently of hayfields and pastures throughout much of this species' breeding range has been the primary factor affecting this sparrow's long-term population decline (Vickery et al. in press).

Grasshopper Sparrows (as well as nearly the complete majority of other bird species in this country) are federally protected by the Migratory Bird Treaty Act of 1918, which says that it is "unlawful without a waiver to pursue, hunt, take, capture, kill or sell birds listed therein ("migratory birds"). The statute does not discriminate between live or dead birds and also grants full protection to any bird parts including feathers, eggs and nests."

Additionally, Grasshopper Sparrows are a California Species of Special Concern, Second Priority as determined by a ranking score based on seven criteria (Shuford and Gardali 2008).

There is a conundrum here, and I'd like to see if something can be done about it: The hayfield provides good habitat for grassland birds. At the same time, I'm sure the ranchers make an income from the hay and/or use it to feed their own livestock and it's probably important to time mowing properly to maximize hay nutrient content and quality. I assume that delaying mowing until after the breeding season is probably not an option(?), although that would be the best one. In this specific situation, though, there might be a way to find a balance between the ranchers hay-growing and harvesting operation and protection of nesting birds, particularly Grasshopper Sparrows. One idea that comes to mind at the moment is that once the hay has matured and is ready for harvest, a biological survey of the area to be mowed could be conducted and if necessary, a protective buffer could be determined and established between the habitat occupied by the Grasshopper Sparrows and the area that is mowed.

Concern ID: 51920

CONCERN STATEMENT: Commenters stated that the scope of the Ranch CMP should only evaluate new impacts, and changes from the status quo, of ranching operations to species of special concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). They further stated that ranching is part of the baseline, and as such, should not be evaluated in this Ranch CMP.

Representative Quote(s): **Corr. ID:** 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: 4) Species of Special Concern

NEPA requires a federal agency to analyze the effects of new activities on the human environment. Ranching and farming activities are a part of the environmental baseline. The status quo of continuing ranching should not be evaluated within this environmental assessment process; it should be categorically excluded, pursuant to NEPA. Special status species or species of special concern analysis should be limited to new activities with a potential to have effects on the environmental baseline. This CMP EA should be limited in scope to the effects of new effects anticipated from new development and changes from the status quo only. During analysis of potential impacts to species of special concern by new activities, the plan objectives should be kept in mind. Using potential adverse impacts to special status species to block requested changes to the status quo, especially for activities allowed elsewhere in Marin County, would create further unfair disadvantage to seashore ranchers and undermine the plan objective.

IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk)

Concern ID: 51921

CONCERN STATEMENT: Commenters stated that the Ranch CMP should describe and assess the impacts of ranching operations to fish and wildlife and associated habitat, including: impacts to breeding birds resulting from mowing and subsequent predation and impacts to wildlife species (and the public) resulting from the use of electric fencing. Further, commenters requested that the Ranch CMP describe the habitat that ranchers provide and the species that utilize these habitats, as well as the habitat needs of wildlife species within the park.

Commenters also requested that the Ranch CMP broaden the scope to include analyses of all native species within the park (other than the tule elk).

Representative Quote(s):

Corr. ID: 1016

Representative Quote: Yesterday on my walk out to Abbotts Lagoon I witnessed many Grasshopper Sparrows dropping down into the tall grasses in the fields adjacent to the trail. On my return that field and many others within my view had been mowed down. There were many Crows feeding on these freshly mowed fields. Being breeding season I presume that the Crows

were feeding mostly on eggs or chicks of the Grasshopper Sparrow and other ground nesting birds.

I am a longtime and devoted bird watcher. This was a very heartbreaking event for me to witness.

I realize that the mowing for hay is a time sensitive business. Never the less, I wanted to bring this to your attention in the hopes that a solution to this horrible problem could be achieved.

Corr. ID: 1140 **Organization:** Environmental Action Committee of West Marin

Representative Quote: Electric Fencing: How much electric fencing is currently in use in the Seashore? EAC would not support this becoming the dominant form of fencing. The Ranch Plan must analyze the cumulative impacts of such fencing on public access and wildlife movement.

Corr. ID: 3049 **Organization:** Marin Audubon Society

Representative Quote: Describe the habitat that ranchlands provide for native species that depend on Seashore lands. Discuss bird and mammal species that use the ranch grazing lands for forage and/or hunting.

Corr. ID: 3049 **Organization:** Marin Audubon Society

Representative Quote: We recommend that the scope be broadened to address all of the native species that depend on lands and habitats that are under ranching operations or influenced by them. It is the NPS responsibility to protect these resources by overseeing the ranching operations in a manner that ensures they are responsible stewards of habitats and wildlife, and that the two management objectives of wildlife/habitat and ranch operations coexist.

A CMP should not be based on one specie that may be causing problems at this time; there are m any other native species of concern that could present problems/conflicts with ranching operations in the future.

Concern ID:
CONCERN
STATEMENT:

51922
Commenters indicated that the Ranch CMP appears to be focusing on an approach that neglects federal and state listed species and their habitats, stating that the NPS should focus on preservation and restoration of listed and native species (including the pronghorn) and that any commercial operation that is not compatible with this focus should be removed.

Representative
Quote(s):

Corr. ID: 867 **Organization:** Center for Biological Diversity

Representative Quote: Any commercial uses not compatible with protecting and recovering state and federally listed species, including livestock grazing, agricultural cultivation, and spread or maintenance of invasive species, should be removed.

Corr. ID: 1038 **Organization:** the Wildlife Trust

Representative Quote: Because the native pronghorn antelope were

eliminated from the Pt. Reyes peninsula by ranchers and hunters by the late 1800s, it is important that the Ranch Management Plan include a detailed plan and schedule outlining a program to re-introduce this iconic and popular species to PRNS.

Corr. ID: 3049 **Organization:** Marin Audubon Society
Representative Quote: We are concerned that this approach appears to neglect habitats and the many native species that depend on the park and rangeland resources.

Although in the hand-out there is a brief mention of protecting native wildlife and vegetation populations along with sensitive and rare natural resources (along with cultural resources), this appears to be a minor focus.

IT1500 - Impact Topic: Tule Elk (not relating to management)

Concern ID: 51924
CONCERN STATEMENT: One commenter asked for an explanation of the impacts on elk as a result of ranch operations.
Representative Quote(s):

Corr. ID: 30
Representative Quote: -What are the impacts of the ranch operations on elk.

Concern ID: 51925
CONCERN STATEMENT: One commenter requested an explanation of elk habitat needs, feeding habits, and where they overlap with cattle.
Representative Quote(s):

Corr. ID: 3049 **Organization:** Marin Audubon Society
Representative Quote: What are the habitat needs of Elk. Discuss the feeding habits for the elk and the cattle. How do they overlap and where?

Concern ID: 51926
CONCERN STATEMENT: Several commenters provided details about the history of elk in the area over the past 10,000 years and the change in population numbers. One commenter requested additional information on their history including specific numbers and ecosystem services that they provide.

Representative Quote(s):

Corr. ID: 28
Representative Quote: -Incredible opportunity to restore the elk herd. Originally 500,000 in the state - theres less than 4,000 now. They are native - cattle are non-native.

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: Tule elk have been grazing at PRNS for about 10,000 years, except during a brief period in the 1800s and 1900s, when ranchers and market hunters eliminated them from most of California.

Fortunately, tule elk have taken well to reintroduction and the PRNS tule elk herd is one of the largest of the 22 herds in California.

Corr. ID: 3049 **Organization:** Marin Audubon Society
Representative Quote: What is the value of the elk herds to the ecosystem? What were their historic numbers? What were the historic numbers of elk? What ecosystem services do they provide?

Corr. ID: 3064 **Organization:** In Defense of Animals
Representative Quote: Tule elk along with deer and pronghorn have grazed the grasslands along the California coast for at least 10,000 years, while cattle grazing has occurred more recently over the last two hundred years. Not cattle, but tule elk and other wildlife are the true and "historic" grazers of the lands now comprising the PRNS.

Concern ID:
CONCERN
STATEMENT:

52167
One commenter presented several specific questions pertaining to the management of the elk population, including the following requests: provide information on possible model management plans, describe the role of state agencies (such as the California Department of Fish and Wildlife) in management of the park elk population, provide information on what a healthy elk population looks like in the Limantour wilderness (including optimal herd size in varying climatic conditions and measures to maintain a self-sustaining herd without predators), provide information on all of the potential management tools to maintain an optimal herd size (such as culling, fertility control, moving elk, fencing, and periodic burns), provide a discussion on potential fencing methods to keep elk out of the pastoral zone, provide a discussion on methods to prevent the transmission of disease to cattle, and provide a discussion of BMPs needed to sustain the optimal herd.

Representative
Quote(s):

Corr. ID: 2960 **Organization:** Marin Conservation League
Representative Quote: What management models for balancing herd size with available resources exist for tule elk on other California sites? Please describe.

Corr. ID: 2960 **Organization:** Marin Conservation League
Representative Quote: Discuss types of fencing, and the costs, available that would confine elk and keep them out of the pastoral zone ranches.

Corr. ID: 2960 **Organization:** Marin Conservation League
Representative Quote: What provisions are there to ensure that free roaming elk infected with transmittable diseases do not infect ranch animals, which are confined? This should be considered in relation to varying climate conditions like drought that could exacerbate the rate at which diseases spread among a population, such as by dehydration or starvation.

Corr. ID: 2960 **Organization:** Marin Conservation League
Representative Quote: Describe the measures the Park Service takes, and could take, to ensure that the Limantour wilderness area herd survives in a healthy state. What would be an optimal herd size in years with varying climate conditions, and what measures can be instituted to maintain a self-sustaining herd size in the absence of predators and in a landscape with vegetation that is becoming less and less similar to what it was when the elk roamed free in California centuries ago?

Corr. ID: 2960 **Organization:** Marin Conservation League
Representative Quote: Define the role of the California Department of Fish and Wildlife in management decisions regarding elk in the Seashore.

Corr. ID: 2960 **Organization:** Marin Conservation League
Representative Quote: What measures can and should be taken to reduce the number of tule elk in the Tomales and Limantour wilderness area to a self-sustaining size in their wilderness area? Discuss the various possibilities, e.g. culling techniques, fertility control, physically moving elk to another wilderness area, adequate fencing, periodic burns to refresh grassland and improve soil.

Corr. ID: 2960 **Organization:** Marin Conservation League
Representative Quote: What are best management practices to manage the population size of a confined herd, i.e., the herd confined at Tomales Point, to avoid starvation or dehydration as primary regulating factors?

IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species)

Concern ID: 51929

**CONCERN
STATEMENT:**

Commenters would like the Ranch CMP to analyze the benefits of using ranch operations such as grazing, tilling, mowing, mechanical harvesting, fencing, and other agricultural practices on the control and management of non-native invasive plants within the park. One commenter also requested that the Ranch CMP study the benefits of utilizing herbicides, indicating that the use of some herbicides may be necessary.

**Representative
Quote(s):**

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: c) Non-native species management. PRSRA members are committed to work with rangeland managers, NPS, NRCS, UCCE, Marin County Ag Commissioner and others to employ best management practices to help manage non-native plant species. PRSRA requests that this EA study the well-established benefits of using livestock grazing, multi-species grazing, MIG grazing, tilling, mowing, mechanical harvesting, fencing and other agricultural practices on control and management of non-native invasive plants.

PRNS currently uses herbicides for the control of non-native invasive plants within the project area. PRSRA request that the EA study the benefits of

allowing ranchers, in certain circumstances, to use herbicides to control invasive weeds. On occasion, invasive weeds may begin to invade areas inaccessible to mechanical control. Sometimes the invasive is not palatable to cattle. In these circumstances, PRSRA members believe that the use of an herbicide may have less adverse environmental impact than the rampant proliferation a non-native invasive weed may have. Although it may be only on rare occasions, PRSRA asks that PRNS authorize the use of herbicides when necessary.

Concern ID:

51927

**CONCERN
STATEMENT:**

Commenters stated that the Ranch CMP should evaluate and describe the past and present extent of exotic and invasive plant species in the project area and the impacts of exotic and invasive plant species to native coastal prairie at the park. The influence of cattle grazing on the presence, spread, and potential control of exotic and invasive plant species should also be analyzed. Information on the past extent of these species was provided. Commenters also indicated that the Ranch CMP should analyze the effects of alternatives on invasive species actions.

**Representative
Quote(s):**

Corr. ID: 1010

Representative Quote: Exotic plants. The Park Service should discuss the extent to which exotic plants exist in the ranch areas, how they got there, and how the Park Service intends to deal with them.

Corr. ID: 1032

Representative Quote: Original perennial grasses were of two types: bunchgrasses and sod forming grasses.

"The coastal Prairie at Pt. Reyes probably developed under light grazing pressure by elk and with frequent fires set by native peoples...The shift from elk to cattle that accompanied European colonization changed the grazing pattern from seasonal to year round, increasing the intensity of the grazing pressure and favoring a shift from prairie to range land.

As early as 1793, a Spanish lieutenant named De Goyecha described the peninsula as 'very good pasture and springs in all parts, very appropriate for raising of cattle of all kinds and very extensive'; the fate of the pristine prairie was sealed. As a result of grazing pressure and intentional plowing, burning and planting, most native perennial grasses were replaced by immigrants. The disappearance of antelope and elk soon followed.

Where grazing has ceased or not occurred, the combined influence of climate and soil types favor perennial plants...however this natural advantage is overcome by domestic livestock. Intensive grazing causes a reduction in plant vigor and removes a critical amount of mulch, thereby tilting the balance in favor of exotic annual species. When cattle are removed the community tends to revert to native perennials, although it may never recover completely'.

Jules C. Evens, the Natural History of the Point Reyes Peninsula.

Corr. ID: 1055

Organization: Western Watersheds Project

Representative Quote: The NEPA review should document and analyze the effects of each alternative on invasive species. The distribution of invasive plant species in the pastoral zone should be mapped. Cattle are effective agents in dispersing exotic species and may disperse more than an order of magnitude more seeds than elk and deer per animal (Bartuszevige and Endress, 2008). Cattle can break and degrade protective soil crusts and thus increase the ability of invasive species to become established. The contribution of historic and current cattle grazing on invasive species distribution should be analyzed including the role of livestock in damaging sensitive soil crusts that can retard the spread of invasive plants.

Concern ID:
CONCERN
STATEMENT:

51930
Commenters expressed concern over the brush encroachment that has resulted from changes in management practices (such as cessation of grazing and mowing in an area that is no longer under a lease/permit agreement) and indicated that impacts may include: changing fire regimes and creating increased fire threats; altering water availability; causing changes to vegetation structure; creating access issues for visitors; and changing the cultural landscape.

Commenters requested that the Ranch CMP evaluate the history of brush management in the park and consider the benefits (including water quality benefits and reduction in fire danger) of allowing ranchers to control invasive brush in their pasture lands.

Representative
Quote(s):

Corr. ID: 964

Representative Quote: The California Exotic Pest Council Newsletter [Vol 3, No.3 1995 page 6] details that Invasive plant species can fundamentally alter whole ecosystems by changing fire regimes, altering water availability, or causing major changes to a systems vegetative structure." According to the Point Reyes National Seashore Association, 292 species of plants at Point Reyes are not native [http://www.sfnp.org/download_product/1981/0/], so it is imperative that we reduce exotic plant coverage. Some exotics were introduced intentionally as part of the farming and ranching business. What are the policies at NPRS to end the types of disturbance that introduce and maintain exotic plants? We cannot change the past but we do have opportunities to do things differently from now on.

Corr. ID: 1042

Organization: Brown Bag Farms

Representative Quote: To not have the ranches actively ranching those lands would present another scenario of thick brush, poison oak taking over the fields that have been used by the cattle. How hospitable would that be to the Public as it would become so dense that it would be impossible for anyone to hike through it.

Corr. ID: 2960

Organization: Marin Conservation League

Representative Quote: How can grazing be used to reduce fire risk in the Olema Valley? Can productive agriculture be restored in the Olema Valley

Historic Ranch District to cost effectively make this area less of a fire risk as well as bring the park into compliance with historic preservation requirements?

Corr. ID: 3073

Representative Quote: The present fire danger and ever growing fuel load must be a great concern to the Park. Cattle would be helpful in keeping the brush and grass under control as well as keeping within the original Park mandate to preserve the cultural and historic landscape. Rancho Baulines has been grazed for thousands of years, first by elk and deer while being occupied by the Miwok. Later it became the Wilkins dairy. Removing most all grazers is leading to the increasing fuel load, the loss of the grasslands and the historical landscape.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: d) Brush management. Both native and non-native brush species require management in coastal prairie grasslands. Without brush control, the grasslands will likely become lost to brush invasion. This loss of native habitat due to brush invasion has already been demonstrated at PRNS in areas where NPS has removed ranching. Coastal prairie grasslands require management. For hundreds of years, or perhaps millennia, humans have facilitated the persistence of this important ecosystem, through fire, grazing and mowing. PRSRA requests that this EA fully evaluate the fact that brush management has occurred on coastal prairies for all recorded history, a fact that has also been identified through anthropological review. This EA should also consider the ecosystem benefit of preserving the grassland habitat by allowing ranchers to control invasive brush from their pasture lands. PRSRA is committed to work with the agencies to identify the best timing for brush removal to reduce adverse effects to other species.

Rangeland ecologists and watershed managers understand that nutrients and sediments are better controlled and better treated by grass covered soil than brush covered soil. The bare soils often found in the shade of the invasive brush allow water to travel more quickly and with less absorption and less plant nutrient uptake. PRSRA requests that the EA study the water quality benefits of allowing ranchers to continue the tradition of brush control as well as the degraded water quality that would result in any prohibition of brush control.

Concern ID:
CONCERN
STATEMENT:

51932
Commenters stated that the Ranch CMP should consider restoration of native plant communities including coastal prairie. Restoration measures considered should include providing additional lands for restoration, such as lands around Drakes Head.

Representative
Quote(s):

Corr. ID: 1032
Representative Quote: Vegetation:

Restoration of native prairie:

This is very important especially in light of the conflict between the dairies and elk.

Areas that should be free of grazing are the 1,192 acre D Ranch which had been abandoned. This acreage has been divided into thirds. One third is in wilderness and the other two thirds are grazed by adjacent ranches. This is an area is especially favored by the elk which come into conflict with the adjacent ranchers who want to graze their stock there.

Other areas that should be made attractive to the elk due to prairie restoration would be lands around Drakes Head. If these lands were restored as much as possible to its natural state, the elk might find this as an alternative to the dairy lands. Dairies have a long history of Johnes disease which is a disease of confinement.

Corr. ID: 1038 **Organization:** the Wildlife Trust

Representative Quote: Restoration of native plant communities and native wildlife:

A pro-active approach should be undertaken by the NPS within PRNS in general and in the coastal-prairie lands in particular, including the Pastoral Zone, to restore native plants to their endemic habitats.

Corr. ID: 1140 **Organization:** Environmental Action Committee of West Marin

Representative Quote: Native Grass restoration: EAC supports providing incentives and grant funding to restore native grasses that are drought resistant and which were historically present.

Concern ID:
CONCERN
STATEMENT:

51934

Commenters stated that the Ranch CMP should assess both the impacts and benefits of ranching operations on habitats and vegetation, including dunes and non-native plant species. Benefits expressed by commenters included: maintenance of complex vegetation, the use of ranching operations as a tool for the conservation, and restoration of native species. Some impacts described by commenters included: alteration of dominant vegetation species, alteration of the fire regime, increased spread of exotic species, and compaction of soils leading to decreased infiltration and water availability.

Representative
Quote(s):

Corr. ID: 58

Representative Quote: As a wildlife ecologist, I could see the detrimental impact the grazing of the dairy cows was having on this coastal ecosystem, which includes rare dune-dependent plants and animals. I met the official botanist and he is doing a valiant job trying to fend for the many rare and endangered species and subspecies and their populations here.

Corr. ID: 1055 **Organization:** Western Watersheds Project

Representative Quote: There is an extensive literature showing that livestock may increase the risks of high intensity fires by altering the dominance of shrub and forb species, by increasing spread of non-native invasive plants, by compacting soil and reducing moisture content and infiltration, and by increasing the fine fuels that carry fire. Cattle fecal pats readily ignite, are a common source of spot fires, and release extreme

amounts of energy when burning (Scasta et al., 2013).

Corr. ID: 3022

Organization: University of California
Cooperative Extension

Representative Quote: Vegetation. This is a topic that is fundamental to ranching, range management, natural resource management, habitat protection, and fire safety. As described in *The Changing Role of Agriculture in Point Reyes National Seashore* (<http://ucanr.org/sites/uccemarin/files/31000.pdf>), ranching at PRNS provides essential ecosystem services, including helping to maintain the complex vegetation mosaic found there, including its open grasslands, inhabited by many endangered plants and animals, while helping to manage fire fuels that would otherwise present a significant wildfire threat to surrounding communities.

While past livestock grazing has certainly been a factor in the loss of native plant species on some of California's grasslands, today it has proven to be an important tool for conserving and restoring native species.

Corr. ID: 3049

Organization: Marin Audubon Society

Representative Quote: The plan should present a comprehensive analysis of the native species that depend on the park ecosystem for their survival; potential impacts on ranching and impacts of current ranching operations on those habitats. This is needed to determine whether there could be other management methods that could be more beneficial for coexistence. Included for example should be grassland birds that require low/grazed grasses and vagrants that depend on the vagrant trap trees that exist on some ranchlands.

Corr. ID: 3092

Organization: Point Reyes Seashore Ranchers
Association

Representative Quote: This EA should also consider the benefits that could be provided to coastal prairie grassland by properly managed livestock grazing on ranches within the project area where grazing has recently ceased. Returning rancher stewardship to these coastal prairie livestock pastures at no cost to PRNS (actually PRNS would collect SUP fees) are likely to further the NPS goal to preserve the coastal prairie grasslands. PRSRA supports the applications by the historic families in the project area to resume historic grazing operations on these ranch lands in desperate need of rangeland management.

Concern ID:
CONCERN
STATEMENT:

51935

Commenters stated that the Ranch CMP should consider the use of fire as a management tool for invasive species management, brush management, and native vegetation restoration both in ranchlands and wilderness, and should assess the benefits of fire management to the human environment.

Representative
Quote(s):

Corr. ID: 1032

Representative Quote: Fire regime:

The Indians used fire when they struck camp for the season as a way to make

areas near their village sites attractive to wild animals. Fire management is a way to maintain the grasslands of the prairie.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: e) Fire regime. Coastal prairie grasslands require disturbance and invasive species control. Native Americans used fire as a tool to manage the project area before European- Americans arrived. The record tells us that the Point Reyes peninsula and surrounding rangelands were covered with lush grasses and full of wildlife - largely due to the regular burning. European-Americans continued to employ fire as a rangeland tool.

Most current PRSRA members used fire extensively for brush control on these ranches until the NPS stopped the use of fire. PRSRA believes that fire is an appropriate tool to control brush in certain circumstances and, because of the risk of wildfires, not in others.

The cessation of use of fire and grazing has led to an increase in fire fuel loads, especially in the Olema Valley. Grazing can reduce fire fuel loads in these areas. PRSRA requests that the EA study the benefits of re-introducing grazing to these areas and how this could reduce the risk of catastrophic fires causing harm to the resource, personal property and the potential personal injury or death resulting from avoidable wildfires.

PRSRA suggests that in wilderness areas, where almost all native grassland and the species assemblages it supports have been largely lost (especially due to unmanaged brush invasion), fire be considered as a restoration tool. PRSRA asks that this EA also consider the benefits to the human environment resulting from fire fuel reduction and minimizing the risk of more PRNS catastrophic wildfires that prescribed burning could provide. This EA should also analyze the increased wildlife carrying capacity, including that of the tule elk, that would result if PRNS began to manage the now threatened coastal prairie grasslands in the wilderness areas.

Concern ID:
CONCERN
STATEMENT:

51936
Commenters stated that the Ranch CMP should address the impacts of dune management to plant and animal species and ranching operations, including the removal of non-native vegetation from dunes, the impacts on organic certification resulting from using herbicides on non-native grasses, and how blowing sand from the dunes impacts pastureland.

Representative
Quote(s):

Corr. ID: 28
Representative Quote: -Management of sand dunes and non-native grasses should be addressed - need to keep sand from taking over pasture. Address how sprays/herbicides impact organic certification.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: Recently, PRNS, at the objection of PRSRA, has initiated projects to remove the vegetation that was planted to hold the sand in place. Erosion control measures implemented by PRNS have failed. The

result was exactly what PRSRA was concerned about. The moving sand covered valuable pasture land, fences and endangered plant species, including the endangered grass species Sonoma Alopecurus as well as the rare habitat for the Myrtle's Silverspot Butterfly. PRSRA asks that this EA properly consider the dunes as part of the cultural working landscape with non-native plant species. This EA should consider the adverse effects of removing the non-native vegetation from the dunes.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: b) Dunes. The sand dunes located within the pastoral zone have long played a role in the cultural working landscapes of the Shafter era agriculture through to the present. Thankfully, PRNS has included the dune management in this NEPA process. This process may now work to improve the earlier NEPA process undertaken by PRNS. The working landscapes - ranch CMP EA is the proper context to evaluate the effects of the dune management. The sand dunes have always been a threat due to the highly erosive nature of the sand. High winds can easily result in significant sand movement, potentially covering valuable pastureland.

Concern ID:
CONCERN
STATEMENT:

51937
Commenters explained that plant species once found in the coastal prairie have been largely replaced by non-native species over the past 150 years of land use and stated that the Ranch CMP should evaluate the impacts that vegetation restoration would have on ranching operations.

Representative
Quote(s):

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: Restoration of native prairie. It is widely recognized that most of the native plant species once found in the coastal prairie grasslands within the subject area have been replaced by non-native species, either intentionally or accidentally, over the past 150 years of European-American land use. PRSRA believes that true restoration of native coastal prairie is only possible in rare locations within the ranch lands in the subject area. Generations of livestock grazing, exotic seed planting, tilling, crop production, imported feed with exotic plant seeds have all contributed to this shift. These practices, which have changed the landscape and the plant communities beginning 150 years ago, have continued shaping the landscape through the Shafter era and into the present.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: This EA should study negative effects to the ranchers and their livelihoods if restoration of native plant species takes priority over the continuation of the normal ranch practices that have been part of the working landscapes from the Shafter era through the present time. PRSRA is willing to work with rangeland ecologists and certified rangeland managers to locate areas best suited for row crop production, forage crop production, rangeland planting, rangeland mowing to control invasives, waterline placement, water trough placement, fence installations and other BMP implementation. PRSRA recognizes that there are a few rare locations where native vegetation dominates and areas where special status

species exist. PRSRA commits to working with NPS, NRCS and others to carefully and appropriately manage these sensitive areas. These rare areas have been identified over the years and ranchers and farmers already cooperate with agencies to help preserve these resources.

IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change

Concern ID: 51942

CONCERN STATEMENT: Commenters stated that the Ranch CMP should assess impacts of climate change on ranching operations in the area, including impacts from: changes in weather patterns, extreme weather events, and sea level rise.

Representative

Quote(s):

Corr. ID: 28

Representative Quote: -EA should anticipate climate change/extreme weather events & impact on grazing/ranching industry.

Corr. ID: 964

Representative Quote: Cost of Climate Change

The central California coast is susceptible to changes related to climate change and sea level rise. Recent studies provide a range of sea level rise along the west coast given current emissions. The rise is projected to be from 1.48 by 2050 to over 5 feet by 2100 [Heberger et al. 2009, Cayan et al. 2009]. At these projected rates, sea-level rise could reach approximately 5.9 to 6.6 inches on the high end of the range within the next ten years.

Corr. ID: 1055

Organization: Western Watersheds Project

Representative Quote: The NEPA documents should provide information about the changes that are likely to occur in the project area due to global climate change over the 20-year period of the proposed permit. In the western United States, both the frequency of heavy precipitation events and the frequency of periods of drought have increased over the past century (Christensen et al, Regional Climate Projections, IPCC Fourth Assessment). While uncertainties remain regarding the timing and extent of impacts from climate change, modeling indicates that on average, California will likely experience higher temperatures in all seasons; longer dry periods; heavy precipitation events; more frequent droughts; and increased wildfire risk. These changes will affect the project area, especially riparian and water resources and the species that depend on them as well as the amount and availability of forage. These effects will obviously be more pronounced over a 20 year versus a 10 year permit period.

Global climate change is already impacting the project area. The NPS must evaluate the proposed decision in the context of climate change as both a baseline issue and a cumulative impact to the resources.

Concern ID: 51941

CONCERN STATEMENT: Commenters stated that ranching operations contribute to air pollution, greenhouse gas emissions, and climate change and that the Ranch CMP

should describe mitigation measures to address these impacts. Further, the Ranch CMP should discuss compliance with the Clean Air Act and regional Air Quality Management District guidelines, citing ammonia and noxious gas production as air quality concerns.

**Representative
Quote(s):**

Corr. ID: 792

Representative Quote: Air pollution from cattle farming is also an issue that bears careful evaluation and the development of standards or management practices. Livestock produce significant amounts of greenhouse gases including carbon dioxide, methane and nitrous oxide. much of this is associated with manure management. The CMP process should include a greenhouse gas inventory and careful plans for GHG mitigation. For example, methane generated from manure can be used to generate electricity through an anaerobic digestion process. This would not only help air emissions of methane, but also a major solid waste management problem. BMPs can also be used to mitigate other forms of air pollution such a particulate that is emitted by use of equipment during the dry season.

Corr. ID: 964

Representative Quote: Livestock are estimated to account for 18% of global anthropogenic emissions which contribute to climate change [Gill et al. 2009]. That is nearly a fifth of the cause of altering the climate on the planet. There is not a shortage of cattle (1.5 billion), and food production is not the purpose nor responsibility of national park lands. Rather the purpose of a national park is to lessen or preferably remove anthropogenic impacts on the landscape to the best of its ability.

Corr. ID: 1036

Representative Quote: The President has stated that combating climate change is a priority. Animal agriculture (specifically cattle ranching) contributes the most significant amount of greenhouse gases world wide. As a National Park, it would be out of line with these values to allow the cattle ranching to take place.

Corr. ID: 1055

Organization: Western Watersheds Project

Representative Quote: The Park should document compliance of the Ranch CMP with the Clean Air Act and regional Air Quality Management District guidelines. Ammonia and noxious gas production levels from the beef and dairy facilities should be disclosed in the NEPA documents.

IT1900 - Impact Topic: Visual/Aesthetic Resources

Concern ID:

51943

CONCERN

STATEMENT:

Commenters stated that the Ranch CMP should describe impacts of ranching operations on visual/aesthetic resources including muddy areas and the smell of ranching operations.

*Representative
Quote(s):*

Corr. ID: 1002

Representative Quote: The ranches create such a painful eyesore of overgrazed muddy areas and the smells are putrid.

Corr. ID: 1909

Representative Quote: The ranchers have created an eyesore of muddy and unpassable areas by allowing their cattle to roam and overgraze and the smells are putrid.

Corr. ID: 1939

Representative Quote: The coastline near the lighthouse should be a lovely place to hike, but the ranches are an eyesore of overgrazed muddy areas and the smells are putrid.

IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures

Concern ID:

51945

**CONCERN
STATEMENT:**

Commenters stated that the Ranch CMP should assess the ranching operations and their associated activities as a cultural resource including historic ranching districts, cultural landscapes, historic vernacular landscapes, and ranching families. Some commenters noted that the ranches have designed cultural landscapes that must be retained and that the change in these landscapes should be considered features of these landscapes.

*Representative
Quote(s):*

Corr. ID: 28

Representative Quote: -Consider Ranching families a Cultural Resource and support inter-generational succession.

Corr. ID: 1029

Organization: U.S. Congress

Representative Quote: For over 150 years, agriculture has been a vital part of the fabric of West Marin. That includes the historic ranches and dairies in the Point Reyes National Seashore, which contribute to the special history, character and appeal of this magnificent national park. The National Park Service recognized this in designating the ranches on the Point and in the Olema Valley as vernacular cultural landscapes, landscapes that evolved through use by the people whose needs and activities shaped them. While ranching has caused change, and ranching practices continue to evolve, the fundamental distinctive characteristics of these landscapes have existed for many generations and, we believe, must be retained.

Corr. ID: 1697

Representative Quote: The impacts of the alternative ranch management policies and of related elk mitigation measures on historic resources, including the ranches, must be evaluated.

Corr. ID: 3060

Representative Quote: "Use- Historic, current, and proposed use of the cultural landscape must be considered prior to treatment selection. Historic use is directly linked to its significance, while current and proposed use(s) can affect integrity and existing conditions. Parameters may vary from one landscape to another. For example, in one agricultural landscape, continuation of the historic use can lead to changes in the physical form of a farm to accommodate new crops and equipment. In another agricultural property, new uses may be adapted within the landscape's existing form, order, and features."

Corr. ID: 3060

Representative Quote: Discuss change as a feature of cultural landscapes. Agricultural products, practices, and buildings in the Seashore have changed substantially over 160 years though the character of the Historic Districts has remained substantially intact. These kinds of changes may continue to occur but the cultural landscape can "still exhibit continuity of form, order, use, features, or materials." This section of the CMP-EA could borrow heavily from the Introduction in "The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes").

http://www.nps.gov/history/history/online_books/hps/contents.htm
http://www.nps.gov/history/history/online_books/hps/introduction.pdf

Corr. ID: 3060

Representative Quote: "Change and continuity- There is a balance between change and continuity in all cultural resources. Change is inherent in cultural landscapes; it results from both natural processes and human activities. Sometimes that change is subtle, barely perceptible as with the geomorphological effects on landform. At other times, it is strikingly obvious, as with vegetation, either in cyclical changes of growth and reproduction or the progressive changes of plant competition and succession. This dynamic quality of all cultural landscapes is balanced by the continuity of distinctive characteristics retained over time. For, in spite of a landscape's constant change (or perhaps because of it), a property can still exhibit continuity of form, order, use, features, or materials. Preservation and rehabilitation treatments seek to secure and emphasize continuity while acknowledging change.

Corr. ID: 3060

Representative Quote: "Historic vernacular landscape - a landscape that evolved through use by the people whose activities or occupancy shaped it. Through social or cultural attitudes of an individual, family, or community, the landscape reflects the physical, biological, and cultural character of everyday lives. Function plays a significant role in vernacular landscapes. This can be a farm complex or a district of historic farmsteads along a river valley. Examples include rural historic districts and agricultural landscapes.

Concern ID:
CONCERN
STATEMENT:

51944

Commenters stated that the Ranch CMP should describe cultural resources within the pastoral zone and provide a review of existing inventories while analyzing the effects to these resources. Commenters noted that physical, chemical, and erosional impacts to archeological and cultural sites are of particular concern.

Commenters noted that the Ranch CMP should describe management and monitoring protocols to protect these resources, specifically mentioning the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.

Representative
Quote(s):

Corr. ID: 1055

Organization: Western Watersheds Project

Representative Quote: Livestock grazing may have profound harmful impacts to archeological resources and cultural sites (Broadhead, 1999 ; Osborn et al., 1987). Livestock, especially cattle, are known to impact archeological and cultural sites through a number of mechanisms including mechanical or physical impacts such as trampling, wallowing, and rubbing, dislodging and crushing artifacts; chemical impacts resulting from urine and feces; and, erosion impacts (Foster-Curley, 2003). The environmental review should explain how much of the pastoral zone has been surveyed for cultural resources, review the existing inventory of cultural resources, and analyze the effects of each alternative on these. The Ranch CMP should identify specific modifications to grazing management that will avoid and protect these irreplaceable resources, and provide specific monitoring protocols and time-tables.

Corr. ID: 3060

Representative Quote: **The following quotation is from "The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes" which can be found at:

http://www.nps.gov/history/history/online_books/hps/contents.htm
"Environmental protection requirements- Many cultural landscapes are affected by requirements that address environmental issues. Legislation at the federal, state and municipal level have established rules and regulations for dealing with a variety of natural resources, including water, air, soil, and wildlife. Work predicated on such legislation must be carefully planned and undertaken so that it does not result in the loss of a landscape's character-defining features."

IT2200 - Impact Topic: Socioeconomic Resources

Concern ID:

51953

CONCERN STATEMENT: Commenters noted the importance of historic ranches to local communities stating that they are essential to sustaining local economies through direct job creation and indirect job creation (via support industries such as

distributors, veterinarians, etc.) and that they are important contributors to sustainable food production.

Representative Quote(s):

Corr. ID: 3082

Organization: R & J McClelland Dairy

Representative Quote: Over the past five years California has lost 356 dairies due to a severe downturn in the dairy economy. These dairies either relocated out of state or completely went out of business altogether. This is a growing trend in California due to an unstable conventional dairy market and the high cost of doing business in the state. Why is it devastating for our state to loose even one dairy? Dairies are a vital part of our economy and provide stability in our communities. For every four dairy cows, one job is created. Not only on farm jobs but it creates jobs within the entire community infrastructure. Supply companies, veterinarians, dairy processing plants, distributors, milk truck drivers, feed farmers, retailers, feed supply companies all depend on a thriving dairy industry. Marin and Sonoma Counties have a long standing tradition of being intertwined agriculturally speaking. There are now roughly 85 dairies left in the two counties. Over time, various support industries have developed in order to serve these dairies. These businesses depend on a stable ranching environment. The loss of even one farm can have a devastating effect on the entire Marin/Sonoma infrastructure. We all depend on each other to stay viable in order to keep these support systems in place. Other business indirectly benefit from having farming in their community as well. Restaurants, doctor's offices, banks, retail stores all service farmers and the families they employ. Having thriving farms in a rural community like West Marin is crucial to our local economy.

Corr. ID: 3082

Organization: R & J McClelland Dairy

Representative Quote: The farmers and ranchers of PRNS make up roughly 20% of Marin County's agriculture economy. The farmers and ranchers within the Seashore are stellar examples of people who have learned to adapt to an ever changing industry. The local food movement has taken the Marin County Ag industry by storm the past ten years. More and more people want to support local farmers and ranchers. The farmers and ranchers of PRNS are producing high quality organic milk, grass fed beef and eggs. We are a huge player in producing a local product that people in the North Bay want to have access to.

Concern ID:

51950

CONCERN STATEMENT: Commenters stated that the Ranch CMP should consider how additional or new requirements (monitoring, reporting, etc.) would impact the economic viability of ranch operations in the park, and also consider the reuse of some ranches that have gone out of operation.

Representative Quote(s):

Corr. ID: 1018

Representative Quote: The Ranch CMP should avoid imposing so many regulatory, monitoring, and reporting requirements on the dairy ranches

that they become economically unviable.

Corr. ID: 3074

Organization: Sonoma State University

Representative Quote: This new Ranch CMP effort also must give close attention to assisting the present-day ranches with remaining economically viable, so that there is no further erosion to these important cultural landscapes. It should also encourage re-use of some ranches that have gone out of operation, like the Horick (D) Ranch, Rancho Baulines (Wilkins Ranch), and/or the Jewel Ranch, to bring them back into the overall continuing landscape of agriculture at the Seashore. Ideally, reversing course on the Drakes Bay Oyster Company and retaining that operation as part of the larger working landscape and historic district should be included as well, as oyster cultivation has played an important part of agricultural production, as well as natural resources management, at Point Reyes since the 1930s.

Concern ID: 51951

CONCERN STATEMENT: One commenter stated that economic impacts to nearby communities resulting from ranching activities at the park should be assessed in the Ranch CMP.

Representative Quote(s):

Corr. ID: 2933

Representative Quote: The loss of tourist income to nearby communities (e.g. Pt. Reyes Station) due to an excess of ranchland in PORE should also be part of the equation.

Concern ID: 51952

CONCERN STATEMENT: One commenter indicated that agriculture activities within the park represent a small contribution to the overall agricultural value of the surrounding counties and that removal of operations within the park would have little impact on agricultural revenue in the area.

Representative Quote(s):

Corr. ID: 964

Representative Quote: According to an Economic Impacts Study done for the park, "The park's agricultural activities comprise a small percentage of total agricultural value in Marin and Sonoma Counties, approximately 0.9 % 2005," so the removal of them would have little impact on county revenue. [http://www.nps.gov/pore/parkmgmt/upload/planning_economicimpacts_final_061211.pdf page 6]

IT2300 - Impact Topic: Visitor Use, Experience, and Recreation

Concern ID: 51958
CONCERN STATEMENT: One commenter stated that the Ranch CMP should evaluate the benefit to the visitor experience of having a public interpretive center and educational programs within the ranching community that celebrates the working landscape.

Representative Quote(s): **Corr. ID:** 3092 **Organization:** Point Reyes Seashore Ranchers Association
Representative Quote: PRSRA requests that this EA fully evaluate the benefits of the existing interpretive and educational services provided by a PRSRA member at no cost to the visiting public or the taxpayer. This EA should fully consider what it would cost the taxpayer if NPS were to replicate the oyster farm interpretive center to celebrate the working landscapes of the project area. The costs include rent, electricity, a public water system, a waste water treatment system, building maintenance, restroom maintenance, staff time and materials to host over 50,000 visitors per year, 7 days a week. The EA should evaluate the benefit of having the public interpretive center in the middle of the working landscapes. It should consider the educational value of having the center on a working farm where children can see and learn about where their food comes from. It should also evaluate the benefits of having a traditional multi-generational ranching family leading the educational programs.

Concern ID: 51954
CONCERN STATEMENT: Commenters stated that ranching operations result in impacts, both adverse and beneficial, to visitor use, experience, and recreation. Benefits include experiencing the landscape, the wildlife, and the ranching community as a valuable historic resource. Concerns with ranching operations at the park included access restrictions on ranches, impacts and access to trails and other park resources, visual intrusions, the smell of ranch operations, and inconsistency with expectations of wilderness. The Ranch CMP should consider strategies that would improve the condition of public trails in the pastoral zone and address current degraded trail conditions while offsetting losses to ranchers.

Representative Quote(s): **Corr. ID:** 1015 **Organization:** Tule Elk foundation
Representative Quote: here are many opportunities throughout much of California (right off of most freeways and other public roads) to observe dairy/cattle grazing. In fact, most California citizens, residents and numerous visitors over the last nearly 80years have seen European cattle and dairy operations on a daily basis. These dairy/grazing operations have replaced most natural processes in the California landscape. It is far more rare, if not nonexistent, to see a restored landscape with native species grazing and browsing relatively undisturbed by the human presence.

Corr. ID: 1022 **Organization:** In Defense of Animals
Representative Quote: The NPS has an obligation not just to ranchers, but to the American public and the 2.8 million visitors PRNS receives annually. These visitors do not come to see ranches and cattle or to experience unpleasant odors and visual blight or areas full of mud and animal waste

related to dairy operations. In fact, many of our local supporters do not want to see any animals in confinement at all, and are upset about the fact they are confronted with animal exploitation in an area where they expect animals to be wild and free.

Corr. ID: 1032

Representative Quote: The visitor experience of ranching includes unpleasant odors and visual blight especially in regard to dairy operations. Corralled areas of mud and fecal and urine waste are disgusting to those seeking a wilderness experience. This problem of confinement is conducive to disease conditions.

Corr. ID: 2986

Organization: Marin Humane Society

Representative Quote: The visitor experience at the Point Reyes National Seashore is not to be underestimated. The variety of opportunities attracts tourists from all over the world. The landscape, wildlife, and ranching community should continue to be a historic treasure that is supported not only locally, but nationally. Many feel that there are untapped experiences to invite more public contact in some of the niche ranches that mirror other local programs. Creating partnerships with those on the land with individuals that want more of an in-depth experience will only heighten environmental awareness and stewardship. It will also support the local economy.

Corr. ID: 3050

Representative Quote: Point Reyes National Seashore is a destination for me when I want to show visiting friends and family the sheer beauty and natural wonder that is available just three hours away. The problem is that each time the experience is appreciably diminished by the barbed wire fencing that intends to keep cattle in and wild animals out of what ought to be natural grazing land and secure habitat for the tule elk and other wild creatures inherently entitled to be there.

Corr. ID: 3055

Representative Quote: Trails on agricultural lands. Many of the hiking trails in the Park (including but not limited to Bull Point Trail, Estero Trail, Tomales Bay Trailhead, Earthquake Trail and the network of trails along the Bolinas Ridge) are acutely impacted by cattle. Particularly those sections of the trails are subject to acute erosion and are rendered almost impassible during the wet season should be afforded extra consideration. In areas where exclusionary fencing is feasible, leases could be offset for lost pasture, either in fees or exchange for other acreage. There needs to be a broad recognition of the importance of visitor access within the pastoral zone and better management/maintenance by the Park and leaseholders so that these trails are kept in a passable state.

Concern ID:
CONCERN
STATEMENT:

51959

One commenter stated that ranchers are willing to cooperate with the park in preserving existing public access through the ranch lands, but that any

additional access could result in infrastructure challenges and changes in livestock behavior that could threaten the visitor experience and pose safety concerns for the visiting public.

*Representative
Quote(s):*

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: b) Access. PRSRA members are always willing to cooperate with preserving existing public access through the ranch and farm lands in the subject area. Any contemplated changes to the current access baseline should be evaluated in this EA. New public access through ranch land usually results in more work for the rancher. These challenges could include new gates, gates being left open, prohibition on new important fencing or other BMP, parking challenges, disturbance to livestock, wildlife disturbance, and loss of privacy.

This EA should also analyze the fact that new access could also lead to potential risk to the visiting public. New public access through historic livestock pastures could disrupt normal animal behavior. Changes in stimuli and disturbance can lead to increased anxiety and, in some instances, aggression in domestic livestock.

This EA should also evaluate the benefits of NPS providing indemnification to the ranchers in case of injury to members of the public caused by livestock. PRSRA believes that this would be fair because it is NPS that is encouraging public access through ranchers livestock, not the ranchers.

*Concern ID:
CONCERN
STATEMENT:*

52159
Commenters stated that opportunities exist at the oyster farm to take tours and purchase products and at B Ranch to participate in farm stays and that offering these opportunities more broadly within the park would enhance the visitor experience and produce income for the ranchers.

*Representative
Quote(s):*

Corr. ID: 3082 **Organization:** R & J McClelland Dairy
Representative Quote: How many times a day do you have to milk the cows? How much milk does one cow produce? Do brown cows make chocolate milk? These are all questions that are on the minds of the American public. When the PRNS came to be more and more people got into their cars and made the journey to visit the majestic peninsula. As they make their way out to the various points of interest in the Seashore, they have the opportunity to pass by these historic farms and ranches. A huge portion of the American population is not involved in farming and has not been for generations. A trip out to PRNS not only gives them the chance to see a historic way of life, they also get to see firsthand where their food comes from. They have an opportunity to meet the people who manage these small family farms and get out onto the farm to take in all of the sights, sounds and smells around them.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: Today, the oyster farm is the only PRSRA member permitted to sell its products to the visiting public in its on-farm store. This

is a valuable recreational opportunity for the visiting public. It is truly exciting for families and children to experience a visit to the working landscape, see the farm and have the opportunity to purchase the farm product at its source. This EA should evaluate the benefits of on-farm product purchasing opportunities for the visiting public. These opportunities provide the following to the visiting public: education, recreation and a connection to a historic, yet fully active food producing region. All the while, these opportunities also help the ranchers and farmers connect with the public that appreciates their work and provides additional farm income.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: Today, the Mendoza family (B Ranch) is the only member of PRSRA allowed to have farmstays. Overnight stays on other working ranches within the project area would offer more recreational opportunities for visiting families interested in experiencing the working landscape culture with the families that have been a part of the landscape and history for generations. This EA should evaluate the public benefit of the ranchers offering daytime farm work experiences and overnight on-farm accommodations as well as the benefit to the ranching family by allowing additional farm income.

Corr. ID: 3092 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: Today, the oyster farm is the only member of PRSRA organized and permitted to offer regular farm tours. The oyster farm does not currently charge any fee for the tours. This EA should consider the effects on the human environment of allowing other ranches and farms to provide farm tours if requested. If NPS would allow other ranchers and farmers to offer tours at a fee, the public would benefit from the recreational value and the rancher would benefit from the income generated.

Concern ID: 52169

CONCERN STATEMENT: [One commenter cited the significance of the tule elk to visitor experience within the park and indicated that public attitudes should be assessed in the development of the Ranch CMP.](#)

Representative Quote(s): **Corr. ID:** 2936 **Organization:** The Humane Society of the United States

Representative Quote: Tule elk contribute significantly to visitor use and experience at Point Reyes. Therefore, information on attitudes and interests of visitors and the general public towards the Park and the elk should be sought through formal data collection and considered in developing the draft purpose, need, objectives, and scope of the Ranch CMP/EA.

IT2400 - Impact Topic: Health and Safety

Concern ID: 51960

CONCERN STATEMENT: [Commenters suggested that the impact topic for health and safety related to operator and worker housing should be dismissed due to existing standards](#)

and inspection protocols in place and adherence to corrective measures required.

Representative Quote(s):

Corr. ID: 3092

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: 5) Health and Safety
- Standards for operator and worker housing.

PRSRA is puzzled by this section that PRNS has identified as an issue to be included in the Ranch CMP EA.

The worker housing on the ranches and farms have health and safety standards that must be followed. PRNS and the United States Public Health Department (USPH), on an annual basis, inspect all worker housing on every historic ranch or farm located within the working landscapes of GGNRA and PRNS. PRNS and USPH then provide inspection reports to the ranchers and farmers that provide and maintain the housing. If the agencies find any health or safety non-compliance, they require the rancher or farmer to correct the deficiency. This regulatory oversight seems to be appropriate in assuring health and safety standards are met for worker housing.

PRSRA is concerned that because PRNS listed worker housing health and safety as an issue, the public perception may be that there is a problem with health and safety of the workers housing on the ranches or that the changes contemplated by this EA may result in adverse effects to worker housing health and safety.

PRSRA does not believe a public process is necessary to ensure that the existing health and safety standards be applied to new housing. It seems self-evident that the existing standards and inspection protocols would apply.

IT2500 - Impact Topic: Wilderness

Concern ID:

51963

CONCERN STATEMENT:

One commenter stated that the Wilderness Act allows for certain domestic livestock grazing operations to continue in areas that were established prior to designation of those areas as wilderness as long as operations are consistent with the preservation of the wilderness character. The commenter noted that grazing in wilderness has been set aside by court rulings in the past where agencies have failed to address impacts to wilderness conditions.

Representative Quote(s):

Corr. ID: 1055

Organization: Western Watersheds Project

Representative Quote: Section 4(d)(4)(2) of the Wilderness Act allows certain domestic livestock grazing operations to continue where established prior to wilderness designation. However, any allowed grazing is subject to reasonable regulations and must overall be consistent with preserving and

restoring the wilderness character. The Act requires the NPS to administer wilderness to retain its primeval character and influence.

Wilderness character is a valuable resource and important use of Park lands. Values associated with wilderness character that should be analyzed include: naturalness and opportunities for solitude; scenic values; primitive recreation value, such as hiking, camping, hunting and wildlife viewing; plant and wildlife habitat values - due to their unspoiled state, lands with wilderness characteristics provide valuable habitat for wildlife, biodiversity, watershed protection and overall healthy ecosystems; cultural resource values - the lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources; and economic and quality of life values - recreation opportunities provided by wilderness quality lands also yield direct economic benefits to local communities and help define the character of the region.

Recent court rulings have set aside grazing decisions based on environmental analyses where agencies failed to address whether the wilderness values as they existed at the time the area was set aside for wilderness could be impaired by the agency's decision to allow grazing, and the cumulative effects of such decisions and other grazing permitted across a wilderness study area. cf. *Western Watersheds Project v. Rosenkrantz*, CV 09-365-E-BLW.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

51961
Commenters suggested that the park should not be considered wilderness due to previous road and housing within the park.

Corr. ID: 1014
Representative Quote: I am a pro rancher environmentalist and do not consider the Point Reyes National Seashore as wilderness.

Corr. ID: 1042 **Organization:** Brown Bag Farms
Representative Quote: Farming and ranching have made this landscape what it is and to call it "wilderness" is a misnomer. "Wilderness" has no roads through it, no habitations and this has never been the case here.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

51964
One commenter stated that designated wilderness should not be manipulated as a part of management actions and that no structures should be authorized that would diminish management of this area as wilderness.

Organization: Environmental Action Committee
Corr. ID: 1140 of West Marin
Representative Quote: Wilderness: The Philip Burton Wilderness area should not be manipulated or changed as part of any management strategy to accommodate the Tule elk. Absolutely no structures should be authorized in the wilderness area that would diminish or compromise management of this area as wilderness.

IT2600 - Impact Topic: Park Operations
Concern ID: 51965

CONCERN STATEMENT: Commenters stated that the Ranch CMP should describe current and future park operations related to ranching operations, including regulatory oversight as well as supervision and management of tule elk population on ranchlands. Commenters also questioned how much management of the tule elk population would be needed (monitoring, fencing, etc.) in the absence of agricultural activities, and suggested the Ranch CMP should describe the cost incurred by the NPS to perform oversight and supervision of ranching operations and management of tule elk on ranchlands and in the pastoral zone. The Ranch CMP should also disclose what chemicals are used in the pastoral zone.

Representative Quote(s):

Corr. ID: 964

Representative Quote: Is elk management categorized under "Park Operations" or "Agricultural Activities" in the 2006 Economic Impact Study? Without livestock and the need for miles of fencing, how much management would elk need? How about being able to use the 17.6% othe budget (in 2005) for restoration of the coastal prairie in the Pastoral Zone instead of Agricultural Activities? The total economic impact (revenue) of the Agricultural Activities within the park totaled \$12.9 million for the state of California {ie., not going to the park), but it cost taxpayers \$12.6 million to manage Agricultural Activities. Does this mean that a few individuals benefit while most pay the bill to ecologically degrade the National Seashore?

[http://www.nps.gov/pore/parkmgmt/upload/planning_economicimpacts_final_061211.pdf pages 7, 25]

Corr. ID: 964

Representative Quote: "The National Park Service, in cooperation with park ranchers, will be constructing numerous grant-funded rangeland water quality improvement projects on seven ranches within Point Reyes National Seashore and Golden Gate National Recreation Area. These Best Management Practices (BMP's) consist of four main project types: cattle exclusion fencing, cattle watering facilities, controlled cattle crossings and erosion control measures."

[http://www.nps.gov/pore/parknews/newsreleases_20120830_range_improvements.htm]

Please explain why the NPS is involved with what should be private business expenses and activities performed on public land. The funds could be used to enhance visitor enjoyment and education through funding restoration projects using trained visitor volunteers.

Corr. ID: 964

Representative Quote: Taxpayers also pay for testing of elk for Johne's disease although it is mostly transmitted from cattle to elk [private

communication with wildlife biologists Dr. Dale McCullough and Dr. Reginald Barrett]. The frequent trapping and testing of elk is an unnecessary interference with them and unnecessary use of park personnel. What has been the total cost to the NPS to administer, manage the Pastoral Zone since its inception, in addition to the initial buyout costs? The extensive costs of the Pastoral Zone ranching point to the incompatibility of livestock operations with the preservation of native ecosystems.

Corr. ID: 964

Representative Quote: Now that the elk are moving into the Pastoral Zone, there is a crisis of forage - elk or cattle? Reporting on a recent forum, The Point Reyes Light wrote, "The park has responded to some of the problems by repairing fences themselves, offering ranchers supplies to fix them, hazing the elk off and filling up nearby ponds to try to lure them off working pastures." But the only way that ranchers can be viable is to remove the elk from their original range. One permittee said she wouldn't take money from the park to compensate her for extra expenses that she incurs due to elk. She just wants the elk gone. [<http://www.ptreyeslight.com/article/ranchers-detail-elk-damages-public-forum>]. But her ranch land already belongs to the American public because the National Park Service paid the previous owners of "her" land \$656,500 in 1964. [The California Coastal Prairie, Point Reyes National Seashore, From Prehistory to Ranching and Beyond by Buce Keegan, 2012].

The Park should present the public with the following information:

1. fees paid by the permittees to the Park
2. the current stocking rate and numbers and kinds of poultry by ranch
3. annual cost of managing the Pastoral Zone
4. Allocation of time by Park personnel to manage the Pastoral Zone
5. Chemicals that are allowed on any part of the Pastoral Zone.

Corr. ID: 964

Representative Quote: Cost in financial terms and Park personnel time Is the management of livestock and poultry businesses, and the monitoring and enforcement of the regulations to exclude wildlife, how public money should be spent in a national park? The time needed to manage a large native ungulate (elk) to satisfy the livestock operators, as in the current proposal, is substantial. The following are examples from recent management reports on the PRNS website: The park wildlife technician has been dedicated to monitoring tule elk nearly full time since fall 2010, with more than 640 surveys to document elk behavior and use of lands within the pastoral zone. In August 2013 two 5000 gallon tanks and 3000 ft. of pipe were installed outside the leased area to maintain water for elk. Elk are hazed off the leased properties by PRNS personnel. The PRNS staff fixes fences when damage is determined to be caused by elk - about 1000 feet of fence has been repaired.

Corr. ID: 3049

Organization: Marin Audubon Society

Representative Quote: What is the oversight does the Park Service exercise over activities and management of the ranches now? For example, what

assurances are there that the lands will not be overgrazed, stream resources are maintained in healthy state and the lands not overrun with invasive species? What is the oversight/supervision that would occur under the management plan? is planned for the future?

IT2700 - Impact Topic: Other/New Impact Topics

Concern ID: 51967

CONCERN

STATEMENT:

Commenters noted that not all lands in the pastoral zone are capable of sustaining livestock and stated that the park must determine the current carrying capacity of these lands for grazing. One commenter noted that, without this evaluation, and the decision that non-native cattle belong here, the park cannot make an appropriate assessment as to whether grazing is an appropriate land use in this area.

Representative

Quote(s):

Corr. ID: 1015

Organization: Tule Elk foundation

Representative Quote: There needs to be a open and scientific-based discussion of the real impacts of non-native European dairy/cattle operations (as well as the exotic species associated with cattle) on these public lands and within a National Park. That should be the central discussion -not "establishing long-term management approaches for Tule Elk affecting agricultural/ease/permit areas"!

Corr. ID: 1055

Organization: Western Watersheds Project

Representative Quote: One of the Management Objectives of the 1980 General Management Plan ("GMP") is to "manage seashore activities in the pastoral and estuarine areas in a manner compatible with resource carrying capacity." GMP at 2.

Clearly not all lands within the pastoral zone are suitable for livestock grazing; for example, exclosures have had to be installed to protect some natural and cultural resources from the direct effects of livestock. Additionally, many areas within the pastoral zone are not actually capable of supporting livestock at all on a sustained basis. This is quite clear even to the casual visitor driving through the Park; bare slopes, gullies and soil erosion are evident from the road through the pastoral zone.

The Park must determine the current carrying capacity and suitability of the lands in the pastoral zone for grazing by livestock, consider how these factors have changed since the 1980 GMP was produced, and analyze how these factors are expected to change over the next 20 years. Without this fundamental baseline data, the Park will not be able to determine if it can meet the GMP objective with continued livestock grazing and thus will not be able authorize any continued livestock grazing. Development of a comprehensive management plan for livestock grazing would thus be unnecessary.

The NPS must also consider resource carrying capacity across the entire Park not just in the pastoral zone. Based on newspaper reports, in contrast

to the portrayal in the scoping letter, Point Reyes ranchers do not share the NPS interests in protecting important park resources such as Tule elk at all. The Park needs to recognize that the commercial interests of already heavily-subsidize public lands ranchers are outside its concern. However, when those commercial operations interfere with the protection of important resources such as Tule elk, the Park's clear responsibility is with resource protection. The Park needs to consider the extent to which the pastoral zone will need to be decreased to assure that sufficient resources exist for the target population of Tule elk across the Park.

Concern ID:

52171

**CONCERN
STATEMENT:**

One commenter expressed concern over the possibility of elk leaving the park, which would result in added pressure on the state fish and wildlife agency. The commenter indicated that the Ranch CMP should plan for this potential outcome. Additionally, this commenter would like data shared pertaining to the movement of the elk herds.

**Representative
Quote(s):**

Corr. ID: 2986

Organization: Marin Humane Society

Representative Quote: The two free-roaming herds of elk outside the fenced area are of great concern to our agency. If they leave the jurisdiction of the Park they become the responsibility of our state Fish and Wildlife agency which is already overwhelmed with tough issues. Our agency would also be potentially impacted as we currently respond to all calls for sick and injured wildlife throughout Marin. Our officers would need additional training and improved equipment to respond to elk calls outside of the Park. We believe it is important to plan for the potential of the elk leaving the area if they are going to continue to multiply at the level reported. Sharing this data and their travel patterns will help us proactively prepare to respond when the elk leave the park.

ON1000 - Other NEPA Issues: General Comments

Concern ID:

51968

**CONCERN
STATEMENT:**

Commenters suggested that a full Environmental Impact Statement should be completed. One commenter noted that the public scoping newsletter gave the impression that the NPS has predetermined its course of action.

**Representative
Quote(s):**

Corr. ID: 1038

Organization: the Wildlife Trust

Representative Quote: Environmental Assessment (EA) vs. Environmental Impact Statement (EIS):

Because of the severe long term documented environmental damage and pollution caused by livestock within PRNS to native plants and wildlife including species that are Threatened and Endangered, and the distinct possibility that at least one of the Alternatives in the PRNS Ranch Management Plan will call for the removal of Tule elk from the 28,000 acre Pastoral Zone, it will be legally appropriate for the NPS to engage in a full EIS for the PRNS Ranch Management Plan.

Corr. ID: 1055 **Organization:** Western Watersheds Project
Representative Quote: Western Watersheds Project strongly urges the NPS to take a second look at its scoping letter for this grazing plan. The general impression we received from reading your scoping letter is that the Park has already predetermined what it is going to do and is simply embarking on a NEPA process that will rubber stamp its pre-decision in clear violation of the law. The scoping letter itself reads as though it was written for the Park by a pro-ranching interest group. Western Watersheds Project fully expects that the NPS will need to complete a full Environmental Impact Statement for this highly controversial grazing plan.

Concern ID:
CONCERN
STATEMENT:

51969
One commenter suggested that the NPS should improve its method for accepting public comments, particularly the NPS should allow comments that are emailed, and that the PEPC webpage should be able to accept formatted comments and attachments.

Representative
Quote(s):

Corr. ID: 1055 **Organization:** Western Watersheds Project
Representative Quote: The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment. 40 CFR § 1500.1. Agencies are to "Encourage and facilitate public involvement in decisions which affect the quality of the human environment." 40 CFR § 1500.2. For reasons that were not explained in the scoping notice, the Park will not accept emailed comments. The Park has provided a limited electronic portal but that will not accept formatted comments or attachments. This makes it difficult for the public to provide copies of scientific papers and reports that will be useful to the Park Service in this analysis. This limiting of the ability of the public to provide input into a project that will impact one of their National Parks is something the Park Service should be deprecating not adopting. In her scoping letter, the Supervisor asked "What do you, as a member of the public, need from NPS to be meaningfully engaged in the planning process?" This is 2014 - providing an email address for commenters would be a good start.

Concern ID:
CONCERN
STATEMENT:

51970
One commenter suggested, per NEPA regulations, that the management of Tule elk and all livestock grazing-related infrastructure must be considered in the scope of this Ranch CMP.

Representative
Quote(s):

Corr. ID: 1055 **Organization:** Western Watersheds Project
Representative Quote: The NEPA implementing regulations require that any possible conflicts between the proposed action and the objectives of any other Federal, regional, State, and local land use plans, policies and controls for the area concerned be reviewed and analyzed. 40 CFR § 1502.16 and § 1506.2(d). Therefore, the Park must evaluate the compatibility of each alternative with all the applicable controlling agreements and plans.

The Park is required to ensure that the proposed action is based on best available science and that it complies with the Point Reyes National Seashore Establishment Act Public Law 87-657, the Park Service Organic Act, the National Historic Preservation Act ("NHPA"), 16 U.S.C. 470 et seq. 1980 General Management Plan, the NEPA, the Clean Water Act, the Endangered Species Act, and other state and federal laws concerning public lands and public resources.

The Park is also required to ensure full consideration of all connected actions in the same NEPA process. Connected actions are those that are "closely related" to the proposal and alternatives. In this case, if the proposed action authorizes livestock grazing this will directly impact the management of Tule elk and other significant Park resources. The Park cannot simply aver that the management of these other resources is outside the scope of the project planning process. Similarly, the Park must consider all livestock grazing-related infrastructure as part of this process. It cannot make a decision to graze separate from any new fencing or new water developments etc. are needed to support that activity since those developments would have no independent utility.

Concern ID:
CONCERN
STATEMENT:

51971
One commenter suggested that the proposed project does not require the NPS to proceed with an EA to comply with NEPA to modify the duration of the leases, because NPS NEPA regulations include a categorical exclusion from further NEPA review for renewals of permits that do not entail new construction or any potential for new environmental impact.

Representative
Quote(s):

Corr. ID: 3032 **Organization:** California Cattlemen's Association
Representative Quote: NPS contends that this CMP/EA is necessary in order to comply with the National Environmental Policy Act (NEPA). However, NEPA does not require NPS to undergo such a process given the limited purpose outlined by NPS and given the current realities of the PRNS.

The purpose identified by NPS in its April 21 notice appears to be limited to the administration of long-term leases for up to 20 years. This purpose, however, is exempt from NEPA, and thus is not required to undergo the EA process. NPS Directors' Order 12 states that "[i]ssuances, extensions, [or] renewals . . . [of] permits that do not entail new construction or any potential for new environmental impact" are excluded from NEPA's requirements. The purpose identified by NPS for PRNS appears to be limited precisely to these circumstances: the renewals of existing permits or the re-issuance of expired permits. NPS's own actions over the years suggests an implicit understanding that no formal EA is required in such circumstances, as NPS has long issued and renewed permits to ranchers at PRNS-including 20 year permits-without undergoing any formal EA process. Even if NPS seeks to change the durations of these leases, or to make them uniform in duration throughout Point Reyes, such permitting and leasing is still exempt from NEPA.

Nor is it clear from looking beyond the "Draft Project Purpose" (which is where one would logically expect to see the action or proposal necessitating the CMP/EA) what might require NPS to institute this CMP/EA under NEPA. Under "Draft Project Need," the only element addressed which is not directly alluded to under the "Draft Project Purpose" is the need to "address concerns related to tule elk impacts to existing ranch operations." While we certainly agree with NPS that there is a need to address this significant impact to ranching, it does not appear that NEPA mandates an EA process to address this issue, either. In 1998, NPS conducted a NEPA process which authorized the relocation of elk to Limantour and rejected an alternative which would have permitted elk in the pastoral zone. The 1998 Management Plan provides NPS with the legal authority to remove the elk from the pastoral zone immediately-no additional time or cost is required, as the NEPA process has already been undertaken.

Concern ID:
CONCERN
STATEMENT:

52233
Commenters state that the 1998 Elk Management Plan provides the needed guidance to address the current presence of elk in the pastoral zone, that a new NEPA analysis is unnecessary to address the issue, and that the NPS should apply the alternative adopted in the 1998 Elk Management Plan.

Representative
Quote(s):

Corr. ID: 3032 **Organization:** California Cattlemen's Association
Representative Quote: If NPS's proposal for the CMP/EA is limited to administration of long-term leases/permits and tule elk management, then NPS need not undergo the lengthy and costly EA process, as NEPA does not require it in these circumstances. In the alternative, if NPS's proposal is in fact broader than these goals, then NPS ought to clarify this project purpose and re-initiate the scoping process such that the purposes are clearly disclosed to the public, permitting more efficient and effective public comment.

Corr. ID: 3074 **Organization:** Sonoma State University
Representative Quote: Furthermore, the environmental impacts of returning the elk to the designated wilderness area had already been studied in the 1998 Tule Elk Management Plan. The elk range identified in the Plan is restricted to the wilderness area around and south of Limantour, not extending into the Pastoral Zone. The question for NEPA is whether or not environmental impacts have been analyzed, not about whether property is public or private. Any possible impacts of relocating elk that have wandered out of the elk range back to where they belong have already been analyzed (in the context of "neighboring" private property), and the resulting document was a Finding of No Significant Impact. Hence there should be no need for additional planning or NEPA review for returning the elk to their originally intended range in the wilderness area near Limantour, as such actions have already been determined to cause no significant impacts. This action should be implemented immediately.

PN1000 - Purpose and Need: Planning Process and Policy

Concern ID: 51973

CONCERN STATEMENT: Commenters suggested that the NPS works too slowly and should shorten the review process for the Ranch CMP and the publication of the decision document.

Representative

Quote(s):

Corr. ID: 28

Representative Quote: -Why should plan take so long - to fall of 2015?

Corr. ID: 34

Representative Quote: The federal government, as well as the park service, appears to work something like a giant sloth. It lumbers and moves slowly. Business, especially the dairy business, by necessity is a fluid, fast moving balance of many variables: weather, feed prices, gas prices, milk prices, etc. It is hard to understand how these two models can work together and support both. In the last 7-10 years the Park Service has seemed to be a big, unresponsive, uninterested entity, mostly concerned with its process and mission and not able to be a very good neighbor.

Corr. ID: 37

Representative Quote: 1.

2. Please set December 31, 2014 as the date for the end of the "Prepare and Release Ranch CMP".

3. Please set March 30, 2015 as the date for the Decision Document.

Too much damage occurs because this process is so drawn out.

Concern ID: 51974

CONCERN STATEMENT: One commenter suggested that the Point Reyes Seashore Ranchers association is not a legal entity, and that this Association has been given too much power in decision-making processes.

Representative

Quote(s):

Corr. ID: 3055

Representative Quote: The Point Reyes Seashore Ranchers Association is not a legal entity that can or should be recognized by park administration. Over the past few years letters from this group have been sent out to the Park and elected officials purporting to represent all the Seashore's agricultural leaseholders- - -when in fact subsequent inquiries find that many of the leaseholders had not seen a copy of the letter and occasionally were completely unaware that their "support" is being registered. As the NPS attempts to meet the challenges of managing working ranches within a national park, it must maintain a level playing field for access to park administration and policy makers. Park policy on agricultural land issues needs to have a balance of voices- - -including but not limited to environmental, recreational, as well as leaseholder and ag worker representation. The elevation of the Ranchers' Association to a recognized entity would perpetuate the potential for misrepresentation and unfairly give more weight to just one sector of the interested parties.

Concern ID: 51975
CONCERN STATEMENT: One commenter suggested that hunting, cropping, culling, internal elk-proof fencing, forced removal/relocation of Tule elk within the park, and the conversion of grazing lands into cultivation-agriculture are in conflict with NEPA and NPS regulations.

Representative Quote(s): **Corr. ID:** 938 **Organization:** The Wildlife Trust
Representative Quote: For these reasons, therefore, it must be stated in the scoping process and eventually in the final Ranch Management Plan that, certain management options are counter-productive to co-existence and would be in conflict with NEPA and other federal laws and NPS regulations. These inappropriate unlawful wildlife/land use management options within PRNS, include: hunting, cropping, culling, internal elk-proof fencing, forced removal/relocation of tule elk within PRNS, and the conversion of grazing lands, including coastal prairie grasslands into cultivation-agriculture.

PN2000 - Purpose and Need: Park Purpose and Significance

Concern ID: 51977
CONCERN STATEMENT: One commenter suggested that the park was established to include the agricultural/pastoral region of the park, and that long-term lease agreements should be established and upheld. They suggested that allowing long term rolling 20 year leases is necessary to maintain long term farming operations, as well as commitments from farm supply business, lenders, and other community support organizations.

Representative Quote(s): **Corr. ID:** 1009 **Organization:** Marin County Agricultural Commissioner
Representative Quote: On August 25, 1916, President Woodrow Wilson signed, interestingly enough the Organic Act creating the National Park Service, a new federal bureau in the Department of the Interior, with a Mission that "the Service thus established shall promote and regulate the use of Federal areas known as national parks, monuments and reservations . . . by such means and measures as conform to the fundamental purpose of the said park&& strives to meet those original goals, while filling many other roles as well: guardian of our diverse cultural and recreational resources; environmental advocate; world leader in the parks and preservation community; and pioneer in the drive to protect America's open space.

In our case the Mission includes the Agricultural/Pastoral Region of the National Seashore, which historically was farmed long before National Park was establishment in 1962. Every effort to promote and protect this agricultural resource should be considered in order to further the Organic Act Mission of the Department of Interior.

Some actions to further the Mission may include developing long term lease documents. Ranching is a commitment that requires day-in and day-out activity, year after year. Marin family farmers are trying to stay competitive, but shifts in farm production costs and the loss of farming neighbors can

have a cascading affect. Family farms rely on neighbors so they may together generate a collective economy of scale to yield economic benefits, as well as provide a buffer against hard times. Allowing long term rolling 20 year leases are necessary to maintain long term farming operations, commitments from farm supply business, lenders, and other community support organizations.

Concern ID:
CONCERN
STATEMENT:

51830
One commenter stated that the enabling legislation for the park did not identify the existing pastoral zone or permanent commercial cattle operations. The pastoral zone, allowing for specific regulated commercial operations, was incorporated in the 1998 Management Plan and did not exclude native wildlife from occurring in this area.

Representative
Quote(s):

Corr. ID: 867 **Organization:** Center for Biological Diversity
Representative Quote: The founding documents of PRNS do not identify a pastoral zone or mandate that commercial cattle operations were to be a permanent fixture at PRNS. The pastoral zone was first mapped and incorporated into the 1998 PRNS Management Plan, allowing for specific regulated commercial cattle operations within the pastoral zone. The 1998 management plan did not exclude native wildlife from the pastoral zone.

Concern ID:
CONCERN
STATEMENT:

51976
Commenters suggested that the park is for wildlife, not for ranchers. Commenters also stated that agricultural uses should only be allowed if they are deemed appropriate and do not impair park resources. One commenter stated that agricultural leases held by individuals who have no direct bloodline to the original owners should be terminated immediately.

Representative
Quote(s):

Corr. ID: 1010
Representative Quote: Ranching and dairying are only allowable where deemed "appropriate" in the "discretion" of the Secretary. In making that discretionary decision the Secretary must determine that such use will not impair the park's "natural values." Further, such use is subject to "restrictive covenants" necessary to carry out the "purposes" of the park's statute. One purpose is that, like the traditional uses of recreation, education and historic preservation, ranching has to be conducted in such a way as to not conflict with the highest priority which is the "maximum protection ... of the natural environment" of the park. Wildlife is part of the natural environment of the park. Conserving wildlife is also a "fundamental purpose" of the national parks.

Thus, to the extent some ranchers speak of the grass and water on the ranches as "theirs," as if they own the grass and water, they don't. In fact, they can ranch only to the extent it doesn't harm the park's resources. This is a national park, not a national ranch.

Corr. ID: 1010
Representative Quote: Given the legal framework above, the Park Service has to make a determination, in its discretion, as to whether grazing is "appropriate." This must be done as to each ranch. The Park Service then

has to determine the extent of grazing (where appropriate) and what conditions or restrictions are necessary. To those ends the Park Service should consider the following:

Carrying capacity. The Park Service should discuss how much forage there is as a first step in authoring grazing on each ranch.

Allocation of forage. The Park Service should discuss how the amount of forage on each ranch should be used, keeping in mind the Park Service's obligations to protect and preserve the natural resources of the park, including wildlife.

Fencing. Fencing is necessary to contain cattle (assuming there will be no "open range"), but it is harmful to wild animals because it restricts their natural movements to varying degrees and occasionally injures or kills them. However, there are fencing methods that are adequate for restricting cattle that are "wildlife friendly."

Corr. ID: 1022 **Organization:** In Defense of Animals
Representative Quote: The PRNS enabling legislation, Sec. 459c-5 statute states that the owner retain for himself and his or her heirs and assigns a right of use and occupancy for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his or her spouse, whichever is later. While the question remains whether or not the NPS has upheld the enforcement of its own legislation of PRNS in this regard, leases held by individuals who have no direct bloodline to the original owners, should be terminated immediately.

Corr. ID: 1038 **Organization:** the Wildlife Trust
Representative Quote: Legal issues concerning commercial grazing leases/permits within PRNS:

The purpose of the U.S. National Park System under law:
"In national parks, the supreme law of the land is the 1916 Organic Act that identifies a single priority holding sway above all other factors: Conserving park wonders unimpaired by harm caused by incompatible uses. Upheld by later court rulings, the Organic Act is crystal clear: the NPS's first obligation is to resource protection, and commercial or recreational uses may be precluded if they impair park resources or values., - Robert B. Keiter; natural resource legal scholar, attorney, founding director of the Wallace Stegner Center for Land, Resources and the Environment at the University of Utah's Quinney Law School, eminent American authority on national park policy. -

Nowhere is it stated that there is an inherent right of individuals or corporations to secure permanent or long-term use, favors or benefits within the National Park Service system units. After the National Park Service bought all the private inholdings within the designated boundary of PRNS, agreements between the former land owners and the NPS allowed

for the temporary leasing/permitting of certain pastoral lands within PRSN for livestock grazing and dairy operations.

Concern ID:

51978

CONCERN STATEMENT:

One commenter suggested that the park should be referred to as a National Seashore in all publications and communications with the public.

Representative

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Quote(s):

Representative Quote: PRNS is a unit of the national park system and PRNS is a National Seashore, not a National Park. PRSRA asks that all EA documents, publications and communications be corrected. Currently, there are many references to park or park resources. These should be changed to seashore or seashore resources. This error, if not corrected, could cause the public and consultants to apply the wrong standards to this environmental review.

PN8000 - Purpose and Need: Objectives In Taking Action

Concern ID:

51979

CONCERN STATEMENT:

Commenters suggested that the Ranch CMP should educate the public about the compatibility of farming and nature by highlighting farm sustainability, marketing, and local production and consumption of the regional agricultural products. Other commenters suggested that an objective of the Ranch CMP should be to ensure that the ranches continue to be economically viable, and to mitigate adverse impacts from Tule elk on ranches.

Other specific objectives suggested by commenters included: favoring native annual wildflowers and perennial grasses, developing unique gastronomic resources, encouraging sustainable agricultural practices, providing a framework for cooperation between hikers and ranchers, and allowing current practices to continue while allowing for diversification.

Representative Quote(s):

Corr. ID: 1009

Organization: Marin County Agricultural Commissioner

Representative Quote: The Point Reyes National Seashore should acknowledge ranchers for their land management and stewardship. This productivity coupled with the high biodiversity, ecological quilt, edge effect of multiple habitats, and topography gives exceptional resiliency for both agriculture and natural systems to flourish. This Environmental Assessment should merge farm sustainability, marketing, and local production and consumption for the regional agricultural products and to educate the public about the compatibility of farming and nature.

Corr. ID: 2982

Representative Quote: The following issues and goals should be among those considered in elaborating the Ranch Comprehensive Management Plan and Environmental Assessment:

- Favoring native annual wildflowers and perennial grasses

- Developing unique gastronomic resources
- Encouraging sustainable agricultural practices
- Providing a framework for cooperation between hikers and ranchers

Corr. ID: 3076 **Organization:** Point Reyes Seashore Ranchers Association

Representative Quote: The plan objective: Identify and evaluate activities that provide operational flexibility to support long-term dairy and beef cattle operations in a manner consistent with the protection of park resources should be amended. This narrow view of only providing operational flexibility to a dairy and beef ranching monoculture misses the true objective of supporting, encouraging and celebrating the truly diversified and dynamic Shafter era agriculture. PRSRA suggests that this objective should be re-written as: Identify and evaluate activities that provide operational flexibility to support the dairy and beef cattle operations as well as the diversified agricultural activities that were present during the Shafter era in a manner consistent with the protection of seashore resources and World Heritage Site management principles that recognize 'continuing landscapes.

NEPA requires an agency to review the effects of its federal action on the whole human environment, not just the effects its action may have on the natural environment. The viability of the ranchers is part of the human environment that this CMP must consider. PRSRA suggests another plan objective: To create a plan that will allow current practices to continue, allow for long term leases/permits, allow for the addition of new practices consistent with Shafter era agriculture and to ensure ranchers financial viability in a manner consistent with the protection of seashore resources.

Concern ID:
CONCERN
STATEMENT:

51980
[Commenters suggested that the Ranch CMP objectives lack specificity, stating specific information that needs clarification, including: additional details regarding any anticipated actions of the Ranch CMP.](#)

Representative
Quote(s):

Corr. ID: 1055 **Organization:** Western Watersheds Project
Representative Quote: The ongoing restoration of the Point Reyes National Seashore Tule elk population is "a jewel in the crown" of NPS success stories. Yet, despite the national significance of the Tule elk restoration the NPS scoping letter states as an objective of the Ranch CMP: "Establish long-term management approach for tule elk affecting agricultural lease/permit areas." That is an outrageous proposal. The National Park Service's mission is to "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." 16 U.S. Code § 1. The National Park Service's mission is not to promote the commercial/business interests of a handful of wealthy, private entities at the expense of treasured public resources.

There is an extensive pertinent literature showing that the presence of cattle alters the behavior of large ungulates including deer and elk, and that cattle

compete with them for various resources (Kie et al., 1991 ; Loft et al., 1991 ; Stewart et al., 2002). The restored Point Reyes tule elk herd did not grow following initial translocation until after the removal of cattle from its habitat in 1980, whence the tule elk population began to dramatically increase (Gogan and Barrett, 1987). The Park needs to incorporate objectives to promote protection for the tule elk and to promote its full recovery as an essential component of the ecosystem of the pastoral zone that has been so devastated by commercial cattle operations.

Corr. ID: 2996 **Organization:** San Francisco Bay Regional Water Quality Control Water Board

Representative Quote: The Project Objectives require more specificity. For example: The statement to "identify and evaluate activities that provide operational flexibility to support long-term operations in a manner consistent with protection of park resources," is unclear to us and therefore, we request that more clarity and specificity of any anticipated actions be included in the objectives and discussed more fully.

Concern ID:
CONCERN
STATEMENT:

51981
Commenters suggested that the Ranch CMP include additional objectives, including: to assess whether confined animal facilities and other rangeland operations are operating in compliance with current federal and state regulations; to address carbon sequestration; to discontinue European cattle operations in the park; to protect Tule elk; to clarify NPS expectations and rancher commitments; and to restore agricultural activities in the Olema Valley and Point Reyes Historic Ranch Districts where they historically existed.

Representative
Quote(s):

Corr. ID: 30
Representative Quote: -Bring carbon sequestration into the goals. Native grasses are especially effective.

Corr. ID: 1015 **Organization:** Tule Elk foundation
Representative Quote: We believe the discussion should be re-worded o the following as a part of a 2014- 2015 mission and vision for our National Parks:

Establishing short and long-term management approaches (including a tentative phase-out plan) for nonnative European cattle and the related operations that occur as a result extending the agricultural lease/permits on pastoral lands.

Corr. ID: 2996 **Organization:** San Francisco Bay Regional Water Quality Control Water Board

Representative Quote: We request that you include an objective explicit to environmental compliance. Specifically, an objective to assess whether confined animal facilities and other rangeland operations are operating in compliance with current federal and State regulations, including but not limited to Waste Discharge Requirements (WDRs) and/or Waivers of WDRs issued by the Water Board for confined animal facilities and grazing operations that operate on NPS lands subject to the RCMP. We would like

to see specific details developed in the Final NEPA document that address rangeland assessment and facility inspections, compliance monitoring, record-keeping, implementation of management practices, reporting, and, if necessary, enforcement. The Final NEPA document should also discuss NPS enforcement of State and federal regulations.

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: Certain seashore ranch lands have recently been taken out of agricultural production, completely changing the land use and its intensity of use, without any environmental review or public process. In some cases, historic families have been displaced. PRSRA asks that one more plan objective be added: Restore agricultural activities in the Olema Valley and Point Reyes Historic Ranch Districts where they historically existed and are not otherwise prohibited by law or are no longer agriculturally viable in areas where grasslands were replaced by dense brush or forest long ago. This EA should consider the benefits of having PRSRA members - - familiar with these rangelands - - involved in the decision-making about which areas are agriculturally viable and which are not.

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: The plan objective: Clarify NPS expectations and rancher commitments to ensure consistency of agricultural lease/permits should be amended. PRSRA believes a more collaborative approach to ensure consistency would improve this objective. PRSRA suggests changing this objective to: Clarify NPS and Ranchers expectations and commitments to ensure consistency of agricultural lease/permits.

Concern ID:

CONCERN STATEMENT:

Representative Quote(s):

51982

One commenter stated that materials prepared to educate the public on the Ranch CMP prior to commenting were misleading in that they imply that the park already has a plan objective to keep the elk in the pastoral zone.

Corr. ID: 3076

Organization: Point Reyes Seashore Ranchers Association

Representative Quote: PRSRA objects to the section entitled Management of Tule Elk on Ranchlands found in the materials describing the current ranch CMP EA. These materials were prepared by PRNS with the intent to educate the public of the elk issue and to encourage public comment. This PRNS description of the issue implies that PRNS has a plan objective of keeping tule elk on the ranchlands and managing them there. It appears as if PRNS is soliciting public comments about managing elk on the ranchlands. PRSRA opposes this language and suggests that this sentence be changed to the more accurate and legally correct requirement to which PRNS must comply: Update the 1998 Environmental Assessment and Elk Management Plan. Unfortunately, damage has already been done by suggesting to the public, during this important comment period, that the new existence of the invasive tule elk on to the pastoral zone is a done deal. The PRNS, its contractors and its experts must consider the fact that the public was given this misleading statement prior to commenting.

PO1000 - Park Operations: Guiding Policies, Regs and Laws

Concern ID: 51984

CONCERN STATEMENT: One commenter requested that the park make available the original transfer documents for grazing properties in the park. Another commenter suggested reevaluating the grazing leases according to statutes 459-459/C7.

Representative

Quote(s):

Corr. ID: 28

Representative Quote: -The Park Service should make available on the web the original transfer documents for properties in grazing w/in the Park. What were the original agreements and Amendments to those Agreements.

Corr. ID: 3052

Representative Quote: Are the 'historical ranches' described in the letter instituted for education and inspiration, or are they operating as a profit oriented industry? The leases need to be reevaluated according to statutes 459-459/C7.

RF1000 - References: Suggested References

Concern ID: 51985

CONCERN STATEMENT: Additional references regarding wildlife-friendly fencing, stewardship and engagement, the management of historic properties, sustainable agriculture, and diversification should be reviewed and considered during the preparation of the Ranch CMP.

Representative Quote(s):

Corr. ID: 1010

Representative Quote: Attached hereto as Exhibit 1 is a 14-page portion of a paper on wildlife friendly fencing entitled "A Landowner's Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind." The document was published by the Montana Fish, Wildlife and Parks Department. It can be found at

http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=OC CsQFjAA&url=http://fwp.mt.gov/fwpDoc.html?id=34461&ei=K9BOU4eqGNPtoASw7 4G4Dg&usg=AFQjCNHr7phey882rOc VMiqmG_86 ATF3pw&sig2=uguJO 1TQJPnQy- TwbwsZsA&bvm=bv.66699033,d.cGU

(This link is not clickable. You must copy and paste it in your browser.) Many state wildlife agencies have adopted the same or similar standards and guidelines on "wildlife-friendly fencing."

Corr. ID: 1015

Organization: Tule Elk foundation

Representative Quote: We would like the NPS to consider its very visionary approach to "Preparing for a Second Century of Stewardship and Engagement" A CALL TO ACTION 2016 -to be an integral consideration in this Ranch CMP Comprehensive Management Planning Process. This

process "rallies employees and partners to advance a shared vision toward 2016- it describes specific goals and measurable actions that chart a new direction for the NPS as it enters its second century." Source: <http://www.nps.gov/calltoaction/index.html>

This vision and mission should be used as an integral component of creating a new vision for the Point Reyes National Seashore and its historic use of sections of the park.

Corr. ID: 2988

Representative Quote: An explanation that, under the National Historic Preservation Act, the Seashore already manages the ranches on the Point and the ranches in the Olema Valley as two historic districts, examples of "vernacular cultural landscapes" (an NPS cultural resource management category under the National Historic Preservation Act).^{*} Discuss change as a feature of cultural landscapes. Agricultural products, practices, and buildings in the Seashore have changed substantially over 160 years though the character of the Historic Districts has remained substantially intact. These kinds of changes may continue to occur but the cultural landscape can still exhibit continuity of form, order, use, features, or materials. This section of the CMP-EA could borrow heavily from the Introduction in The Secretary of the Interior's(Standards for the Treatment of Historic Properties with (Guidelines for the Treatment of Cultural Landscapes). http://www.nps.gov/history/history/online_books/hps/contents.htm
http://www.nps.gov/history/history/online_books/hps/introduction.pdf

Corr. ID: 3022

Organization: University of California
Cooperative Extension

Representative Quote: Farm diversification has been a central tenet of Marin County farmers ability to survive in times when market forces, increasing regulation and more attractive careers threaten to lure young farmers and ranchers away from our many multi-generational farms. Diversification has saved numerous Marin family farms over the past decade as the younger generation chooses to creatively produce new products and find new markets to keep 4th, 5th, and 6th generation farms viable.

University of California Cooperative Extension (UCCE), the University of California Small Farm Program, and many other organizations, have been at the forefront of farm and ranch diversification for over a decade, providing tools and information that agricultural families need to remain viable in a changing world:

http://ucanr.edu/sites/Grown_in_Marin/Resources/Resources_for_Farmers/GIM_Factsheets/; <http://sfp.ucdavis.edu/>

http://ucanr.edu/sites/Grown_in_Marin/Resources/Resources_for_Farmers/Business_Development_777/

<http://coststudies.ucdavis.edu/>

Corr. ID: 3022

Organization: University of California
Cooperative Extension

Representative Quote: Ample information on many of the topics addressed in the scoping documents exists within other agencies. Rather than creating

redundant policies and recommendations, we suggest that PRNS and its consultants familiarize themselves with the extensive body of work on natural resource and agricultural planning and management that already exists for Marin County and California.

Diversification. Agriculture is defined in the Marin County Development Code

(<https://library.municode.com/index.aspx?clientId=16476&stateId=5&stateName=California>) as:

Agriculture (land use). The breeding, raising, pasturing, and grazing of livestock, for the production of food and fiber; the breeding and raising of bees, fish, poultry, and other fowl; and the planting, raising, harvesting and producing of agricultural, aquacultural, horticultural and forestry crops.

Corr. ID: 3022 **Organization:** University of California
Cooperative Extension

Representative Quote: Marin Countywide Plan policies and programs also support agricultural diversification:

Policy AG-2.3 Support Small-Scale Diversification. Diversify agricultural uses and products on a small percentage of agricultural lands to complement existing traditional uses, ensure the continued economic viability of the county agricultural industry, and provide increased food security.

Program AG-2.b Support Sustainable Agriculture. Work with University of California Cooperative Extension (Farm Advisor) and Marin County Agricultural Commissioners staff to assist producers with development, diversification, and marketing of Marins sustainable agricultural products.

By definition, Marin County agriculture is diverse. One of the primary ways that PRNS and other Marin County ranching families have been able to remain economically viable and continue ranching operations generation after generation is by diversifying the types of crops they produce and, in many cases, processing those crops into value added products. Sustainable agriculture relies not only on productive soils and adequate water, but also on each farm familys ability to live on their land and diversify their farming operations as changing times require.

Corr. ID: 3036

Representative Quote: Sources for Policies: The May 21, 2014 letter from the University of California Agricultural and Natural Resources Cooperative Extension, Marin County, provides links to information on many of the topics identified in the scoping announcement. The standards and policies set out in these links are the foundation for agricultural practices in Marin County generally. We join in urging NPS planners to become familiar with these standards and policies and be guided by them in developing the ranch management plan.

[This page intentionally left blank.]

[This page intentionally left blank.]

APPENDIX A: INDEX BY ORGANIZATION TYPE REPORT

Business

Spirit Acres Farm - 1529; MT1000 - Miscellaneous Topics: General Comments.

AFFORDABLE WORLD TRAVEL - 1975; AL200 - Alternatives: Elk Management.

Brown Bag Farms - 1042; AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. IT2500 - Impact Topic: Wilderness.

ClearView Psychotherapy Associates - 1683; AL100 - Alternatives: Agriculture and Agricultural Leases.

Datacomex - 2459; AL100 - Alternatives: Agriculture and Agricultural Leases.

Doorish Ophthalmic Technologies - 1685; MT1000 - Miscellaneous Topics: General Comments.

Drakes Bay Oyster Co - 3079; AL150 - Alternatives: Ranch Operations, Activities, and Management. MT1000 - Miscellaneous Topics: General Comments.

GBT Nunes & Co - 3072; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management.

Historic B Ranch - 3071; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements.

J Ranch - 3065; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future).

L Ranch - 3084; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management.

Lunny Ranch - 3083; AL150 - Alternatives: Ranch Operations, Activities, and Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1200 - Issues: Cultural Resource Management (past, present, and future). IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. IT2100 - Impact Topic: Ranch Complexes (not relating to management).

McClelland's Dairy - 3080; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. 3081; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management.

McClure Dairy, Inc - 3069; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments.

Mclsaac Ranch - 3070; AL150 - Alternatives: Ranch Operations, Activities, and Management. CC1000 - Consultation and Coordination: General Comments. IS1000 - Issues: Environmental Baseline Conditions.

R & J McClelland Dairy - 3082; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IT2200 - Impact Topic: Socioeconomic Resources. IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. 3086; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. IS1200 - Issues: Cultural Resource Management (past, present, and future).

Zanardi Ranch - 3043; MT1000 - Miscellaneous Topics: General Comments.

Government

Marin County Agricultural Commissioner - 1009; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. MT1000 -

Miscellaneous Topics: General Comments. PN2000 - Purpose And Need: Park Purpose And Significance. PN8000 - Purpose And Need: Objectives In Taking Action.

Marin County Farm Bureau - 3088; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management.

U.S. Congress - 1029; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures.

State of California, Governor's Office of Planning and Research - 1000; ON1000 - Other NEPA Issues: General Comments.

Marin County Agricultural Commissioner - 3057; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance.

San Francisco Bay Regional Water Quality Control Water Board - 2996; AL150 - Alternatives: Ranch Operations, Activities, and Management. IT1100 - Impact Topic: Water Quality and Quantity. IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas. PN8000 - Purpose And Need: Objectives In Taking Action.

West Marin Chamber of Commerce - 2963; AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. MT1000 - Miscellaneous Topics: General Comments.

Non-profit/Organizations

Alliance for Local Sustainable Agriculture - 3077; IS1200 - Issues: Cultural Resource Management (past, present, and future).

California Cattlemen's Association - 3032; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. ON1000 - Other NEPA Issues: General Comments.

California Certified Organic Farmers - 1043; AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).

Point Reyes Seashore Ranchers Association - 3076; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1000 - Issues: Environmental Baseline Conditions. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1200 - Issues: Cultural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT2700 - Impact Topic: Other/New Impact Topics. ON1000 - Other NEPA Issues: General Comments. PN2000 - Purpose And Need: Park Purpose And Significance. PN7100 - Purpose and Need: Purpose and Need for Taking Action. PN8000 - Purpose And Need: Objectives In Taking Action. 3092; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas. IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. IT2400 - Impact Topic: Health and Safety.

The Friends of Broward Homeless - 1110; MT1000 - Miscellaneous Topics: General Comments.

W.M. Community Services; W.M. Chamber of Commerce; Pt. Reyes Vellage Assn. - 38; AL200 - Alternatives: Elk Management.

Western United Dairymen - 2995; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and

Coordination: General Comments. 3091; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments.

Center for Biological Diversity - 867; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1100 - Impact Topic: Water Quality and Quantity. IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas. IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). IT1500 - Impact Topic: Tule Elk (not relating to management). MT1000 - Miscellaneous Topics: General Comments. PN1000 - Purpose And Need: Planning Process And Policy. PN2000 - Purpose And Need: Park Purpose And Significance.

Environmental Action Committee of West Marin - 1140; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1000 - Issues: Environmental Baseline Conditions. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1300 - Issues: Natural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT2500 - Impact Topic: Wilderness. MT1000 - Miscellaneous Topics: General Comments.

In Defense of Animals - 1022; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1000 - Issues: Environmental Baseline Conditions. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. PN2000 - Purpose And Need: Park Purpose And Significance. 3064; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1000 - Issues: Environmental Baseline Conditions. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1500 - Impact Topic: Tule Elk (not relating to management). IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. PN2000 - Purpose And Need: Park Purpose And Significance. PN7100 - Purpose and Need: Purpose and Need for Taking Action.

Marin Agricultural Land Trust - 3068; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future).

Marin Audubon Society - 3049; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1000 - Issues: Environmental Baseline Conditions. IS1300 - Issues: Natural Resource Management (past, present, and future). IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas. IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). IT1500 - Impact Topic: Tule Elk (not relating to management). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. IT2600 - Impact Topic: Park Operations.

Marin Conservation League - 2960; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1000 - Issues: Environmental Baseline Conditions. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1200 - Issues: Cultural Resource Management (past, present, and future). IT1500 - Impact Topic: Tule Elk (not relating to management). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species).

Marin Humane Society - 2986; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. IT2700 - Impact Topic: Other/New Impact Topics.

Marin Resource Conservation District - 3085; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 -

Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements.

National Parks Conservation Association - 3040; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1000 - Issues: Environmental Baseline Conditions. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1300 - Issues: Natural Resource Management (past, present, and future). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT2500 - Impact Topic: Wilderness.

North County Humane Society - 2472; AL100 - Alternatives: Agriculture and Agricultural Leases.

Ocean Outfall Group - 2703; AL100 - Alternatives: Agriculture and Agricultural Leases.

Peace to All Beings and Circle of Compassion Association - 1952; AL100 - Alternatives: Agriculture and Agricultural Leases.

San Diego House Rabbit Society - 1112; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).

Save Our Seashore - 2998; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1000 - Issues: Environmental Baseline Conditions.

The Humane Society of the United States - 2936; AL200 - Alternatives: Elk Management. IT2300 - Impact Topic: Visitor Use, Experience, and Recreation.

The Wildlife Trust - 938; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1500 - Impact Topic: Tule Elk (not relating to management). ON1000 - Other NEPA Issues: General Comments. PN1000 - Purpose And Need: Planning Process And Policy. PN2000 - Purpose And Need: Park Purpose And Significance.

Tule Elk foundation - 1015; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. IT2700 - Impact Topic: Other/New Impact Topics. PN1000 - Purpose And Need: Planning Process And Policy. PN8000 - Purpose And Need: Objectives In Taking Action. RF1000 - References: Suggested References.

Turtle Island Restoration Network - 2993; AL300 - Alternatives: Other/New Alternatives or Elements.

Western Watersheds Project - 1055; AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1000 - Issues: Environmental Baseline Conditions. IT1000 - Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries). IT1100 - Impact Topic: Water Quality and Quantity. IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas. IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change. IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. IT2500 - Impact Topic: Wilderness. IT2700 - Impact Topic: Other/New Impact Topics. MT1000 - Miscellaneous Topics: General Comments. ON1000 - Other NEPA Issues: General Comments. PN7100 - Purpose and Need: Purpose and Need for Taking Action. PN8000 - Purpose And Need: Objectives In Taking Action. 1066; MT1000 - Miscellaneous Topics: General Comments.

WildCare - 3003; AL200 - Alternatives: Elk Management.

WildlifeRescue League - 1641; AL200 - Alternatives: Elk Management.

all-creatures.org - 2605; AL200 - Alternatives: Elk Management.

sfbaywildlife.info - 19; AL200 - Alternatives: Elk Management.

the Wildlife Trust - 1038; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish

species; not including tule elk). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). MT1000 - Miscellaneous Topics: General Comments. ON1000 - Other NEPA Issues: General Comments. PN1000 - Purpose And Need: Planning Process And Policy. PN2000 - Purpose And Need: Park Purpose And Significance. International Mountain Bicycling Association - 3033; AL300 - Alternatives: Other/New Alternatives or Elements. Marin County Bicycle Coalition - 3000; AL100 - Alternatives: Agriculture and Agricultural Leases. AL300 - Alternatives: Other/New Alternatives or Elements.

Unaffiliated Individual

Nature Conservancy - 1347; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future).
United States Citizen - 2414; AL100 - Alternatives: Agriculture and Agricultural Leases.
- - 1214; AL100 - Alternatives: Agriculture and Agricultural Leases.
. - 2321; AL200 - Alternatives: Elk Management.
A - 1684; MT1000 - Miscellaneous Topics: General Comments.
Action For Animals - 2809; AL200 - Alternatives: Elk Management.
Aircon Sales and Engineering - 2811; AL200 - Alternatives: Elk Management.
American Citizen - 987; AL200 - Alternatives: Elk Management.
American Institute of Architects - 3019; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).
American citizen - 2443; AL100 - Alternatives: Agriculture and Agricultural Leases.
Andean Tapir Fund - 58; AL100 - Alternatives: Agriculture and Agricultural Leases. IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). 1138; IS1300 - Issues: Natural Resource Management (past, present, and future).
Any that stand for Wildlife and their PROTECTION & WELFARE - 298; AL100 - Alternatives: Agriculture and Agricultural Leases.
Aqua Tek LLC - 2439; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).
BACCHARIS INSTITUTE - 2933; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IT2200 - Impact Topic: Socioeconomic Resources.
Backcountry Horsemen of Utah - 997; AL100 - Alternatives: Agriculture and Agricultural Leases.
Brocco Show Cattle - 2418; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).
CSC Anatomyarts - 1109; AL200 - Alternatives: Elk Management.
California Native Plant Society - 3027; AL200 - Alternatives: Elk Management. MT1000 - Miscellaneous Topics: General Comments.
Chiefland Vet Svc - 2337; AL100 - Alternatives: Agriculture and Agricultural Leases.
Citizen and Taxpayer - 191; AL100 - Alternatives: Agriculture and Agricultural Leases.
Coldwell Banker - 1748; AL100 - Alternatives: Agriculture and Agricultural Leases.
Concerned Students of the Wildlife Technician Program of De Anza College - 3052; AL300 - Alternatives: Other/New Alternatives or Elements. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1100 - Impact Topic: Water Quality and Quantity. PO1000 - Park Operations: Guiding Policies, Regs And Laws.
Dairywife - 25; AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).
De Anza College Environmental Studies Department Student - 20; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).
Defenders of Wildlife - 1833; AL100 - Alternatives: Agriculture and Agricultural Leases.
Digity LLC - 1567; AL200 - Alternatives: Elk Management.
Dr. - 767; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). MT1000 - Miscellaneous Topics: General Comments. PN2000 - Purpose And Need: Park Purpose And Significance. 963; MT1000 - Miscellaneous Topics:

General Comments. 1813; AL100 - Alternatives: Agriculture and Agricultural Leases. 2252; AL200 - Alternatives: Elk Management.

EAC - 33; AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1100 - Impact Topic: Water Quality and Quantity.

Environmental Learning for Kids - 1528; AL100 - Alternatives: Agriculture and Agricultural Leases.

HSUS - 2549; AL100 - Alternatives: Agriculture and Agricultural Leases.

Health Markets Agency - 24; AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).

Home - 1120; AL200 - Alternatives: Elk Management.

IDA - 1540; AL200 - Alternatives: Elk Management. 2029; AL200 - Alternatives: Elk Management. 2422; MT1000 - Miscellaneous Topics: General Comments.

IDA (IN DEFENCE OF ANIMALS) - 1208; AL100 - Alternatives: Agriculture and Agricultural Leases.

IDA member - 2564; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management.

In Defense Of Animals - 2389; MT1000 - Miscellaneous Topics: General Comments.

In Defense for Animals - 2115; AL100 - Alternatives: Agriculture and Agricultural Leases.

In Defense of Animals - 1218; AL100 - Alternatives: Agriculture and Agricultural Leases. 2131; AL100 - Alternatives: Agriculture and Agricultural Leases. 2600; AL100 - Alternatives: Agriculture and Agricultural Leases. 2753; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2792; AL100 - Alternatives: Agriculture and Agricultural Leases.

In Defense of Animals supporters - 625; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. PN2000 - Purpose And Need: Park Purpose And Significance.

Landscap Architect, Planner - 2; MT1000 - Miscellaneous Topics: General Comments.

MALT - 2701; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IT2200 - Impact Topic: Socioeconomic Resources.

MARINWATCH - 3036; AL150 - Alternatives: Ranch Operations, Activities, and Management. IS1000 - Issues: Environmental Baseline Conditions. RF1000 - References: Suggested References.

MRS - 2637; AL100 - Alternatives: Agriculture and Agricultural Leases.

Me myself I - 1103; MT1000 - Miscellaneous Topics: General Comments.

Member - 2824; AL100 - Alternatives: Agriculture and Agricultural Leases.

Member - In Defense of Animals - 2581; AL200 - Alternatives: Elk Management.

Miss - 1556; AL100 - Alternatives: Agriculture and Agricultural Leases. 1620; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2797; AL100 - Alternatives: Agriculture and Agricultural Leases.

Mme - 341; MT1000 - Miscellaneous Topics: General Comments.

Mr. - 84; MT1000 - Miscellaneous Topics: General Comments. 357; AL100 - Alternatives: Agriculture and Agricultural Leases. 518; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. PN2000 - Purpose And Need: Park Purpose And Significance. 1396; AL100 - Alternatives: Agriculture and Agricultural Leases. 1612; AL200 - Alternatives: Elk Management. 1879; AL100 - Alternatives: Agriculture and Agricultural Leases. 1977; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2024; AL100 - Alternatives: Agriculture and Agricultural Leases. 2066; AL100 - Alternatives: Agriculture and Agricultural Leases. 2201; AL200 - Alternatives: Elk Management. 2213; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 2250; MT1000 - Miscellaneous Topics: General Comments. 2299; AL200 - Alternatives: Elk Management. 2404; AL100 - Alternatives: Agriculture and Agricultural Leases. 2498; MT1000 - Miscellaneous Topics: General Comments. 2611; AL200 - Alternatives: Elk Management. 2763; AL200 - Alternatives: Elk Management. 2968; MT1000 - Miscellaneous Topics: General Comments. 2976; AL200 - Alternatives: Elk Management. 3044; MT1000 - Miscellaneous Topics: General Comments.

Mrs. - 302; AL200 - Alternatives: Elk Management. 617; IS1300 - Issues: Natural Resource Management (past, present, and future). 1006; MT1000 - Miscellaneous Topics: General Comments. 1063; MT1000 - Miscellaneous Topics: General Comments. 1312; IS1300 - Issues: Natural Resource Management (past, present, and future). 1422; AL200 - Alternatives: Elk Management. 1430; AL100 - Alternatives: Agriculture and Agricultural Leases. 1446; MT1000 - Miscellaneous Topics: General Comments. 1490; AL200 - Alternatives: Elk Management. 1538; PN2000 - Purpose

And Need: Park Purpose And Significance. 1653; MT1000 - Miscellaneous Topics: General Comments. 1766; MT1000 - Miscellaneous Topics: General Comments. 1778; AL200 - Alternatives: Elk Management. 1928; MT1000 - Miscellaneous Topics: General Comments. 2177; AL200 - Alternatives: Elk Management. 2265; AL200 - Alternatives: Elk Management. 2325; AL100 - Alternatives: Agriculture and Agricultural Leases. 2351; MT1000 - Miscellaneous Topics: General Comments. 2401; AL200 - Alternatives: Elk Management. 2412; AL100 - Alternatives: Agriculture and Agricultural Leases. 2599; MT1000 - Miscellaneous Topics: General Comments. 2711; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management.

Ms. - 232; AL100 - Alternatives: Agriculture and Agricultural Leases. 604; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 735; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 811; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 931; MT1000 - Miscellaneous Topics: General Comments. 982; MT1000 - Miscellaneous Topics: General Comments. 983; AL100 - Alternatives: Agriculture and Agricultural Leases. 1028; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1111; MT1000 - Miscellaneous Topics: General Comments. 1133; MT1000 - Miscellaneous Topics: General Comments. 1135; AL200 - Alternatives: Elk Management. 1170; AL100 - Alternatives: Agriculture and Agricultural Leases. 1177; AL100 - Alternatives: Agriculture and Agricultural Leases. 1178; AL200 - Alternatives: Elk Management. 1244; AL100 - Alternatives: Agriculture and Agricultural Leases. 1292; AL100 - Alternatives: Agriculture and Agricultural Leases. 1319; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 1321; AL100 - Alternatives: Agriculture and Agricultural Leases. 1543; AL100 - Alternatives: Agriculture and Agricultural Leases. 1548; AL100 - Alternatives: Agriculture and Agricultural Leases. 1606; AL100 - Alternatives: Agriculture and Agricultural Leases. 1630; AL200 - Alternatives: Elk Management. 1730; MT1000 - Miscellaneous Topics: General Comments. 1759; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1762; AL200 - Alternatives: Elk Management. 1824; AL100 - Alternatives: Agriculture and Agricultural Leases. 1834; MT1000 - Miscellaneous Topics: General Comments. 1852; AL100 - Alternatives: Agriculture and Agricultural Leases. 1895; MT1000 - Miscellaneous Topics: General Comments. 1934; AL200 - Alternatives: Elk Management. 2103; MT1000 - Miscellaneous Topics: General Comments. 2162; AL100 - Alternatives: Agriculture and Agricultural Leases. 2185; AL100 - Alternatives: Agriculture and Agricultural Leases. 2235; AL100 - Alternatives: Agriculture and Agricultural Leases. 2258; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2294; MT1000 - Miscellaneous Topics: General Comments. 2316; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 2329; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2348; AL200 - Alternatives: Elk Management. 2481; AL100 - Alternatives: Agriculture and Agricultural Leases. 2619; AL100 - Alternatives: Agriculture and Agricultural Leases. 2634; AL100 - Alternatives: Agriculture and Agricultural Leases. 2671; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2788; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2901; AL100 - Alternatives: Agriculture and Agricultural Leases. 2970; AL100 - Alternatives: Agriculture and Agricultural Leases.

N/A - 985; AL100 - Alternatives: Agriculture and Agricultural Leases. 1427; MT1000 - Miscellaneous Topics: General Comments.

NA - 1237; AL200 - Alternatives: Elk Management.

National Park Service - 1628; AL200 - Alternatives: Elk Management.

National Parks Conservation Assn. - 1094; AL100 - Alternatives: Agriculture and Agricultural Leases.

None - 1967; MT1000 - Miscellaneous Topics: General Comments. 2335; MT1000 - Miscellaneous Topics: General Comments. 2507; MT1000 - Miscellaneous Topics: General Comments.

Occidental College - 1302; AL100 - Alternatives: Agriculture and Agricultural Leases.

P - 2292; AL100 - Alternatives: Agriculture and Agricultural Leases.

PCUSA - 2076; AL100 - Alternatives: Agriculture and Agricultural Leases.

PETA - 1803; AL100 - Alternatives: Agriculture and Agricultural Leases.

PETA, Mercy for Animals, Animal Angels - 1597; AL100 - Alternatives: Agriculture and Agricultural Leases.

Private Tax Paying Citizen - 1345; AL100 - Alternatives: Agriculture and Agricultural Leases.

Retired Real Estate Broker - 2128; MT1000 - Miscellaneous Topics: General Comments.

Sierra Organics - 2918; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future).

Society for abandoned animals. - 1609; AL200 - Alternatives: Elk Management.

Sonoma Marin Veterinary Service - 3048; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future).

Sra. - 2567; AL100 - Alternatives: Agriculture and Agricultural Leases.

Tamara Palmer - 1059; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future).

Tata Motors - 2165; AL200 - Alternatives: Elk Management.

Unifor Local 199 - 1942; MT1000 - Miscellaneous Topics: General Comments.

United Stated Citizen - 1993; AL100 - Alternatives: Agriculture and Agricultural Leases.

We the people - 2285; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future).

Willamette Student Chapter - National Lawyers Guild - 1400; AL100 - Alternatives: Agriculture and Agricultural Leases.

Wolfwatcher - 1790; AL100 - Alternatives: Agriculture and Agricultural Leases.

Young/Sommer LLC - 2667; AL100 - Alternatives: Agriculture and Agricultural Leases.

american taxpayer! - 2588; AL100 - Alternatives: Agriculture and Agricultural Leases.

bajacorp - 2025; AL100 - Alternatives: Agriculture and Agricultural Leases.

citizen of the world - 1958; AL100 - Alternatives: Agriculture and Agricultural Leases.

consultant - 2460; MT1000 - Miscellaneous Topics: General Comments.

earthhheart wellness - 2048; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk).

former Parks and Open Space Commissioner - 17; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1300 - Issues: Natural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).

generals tax-paying public - 1581; AL100 - Alternatives: Agriculture and Agricultural Leases.

hansardrobert - 1412; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk).

in defense of animals - 556; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance.

league for the Defense of animals - 2161; MT1000 - Miscellaneous Topics: General Comments.

member - 2433; MT1000 - Miscellaneous Topics: General Comments. 2438; AL100 - Alternatives: Agriculture and Agricultural Leases.

n/a - 1122; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future).

neo - 2723; IS1300 - Issues: Natural Resource Management (past, present, and future).

none - 2837; AL200 - Alternatives: Elk Management. 2939; AL100 - Alternatives: Agriculture and Agricultural Leases.

none - 1462; AL200 - Alternatives: Elk Management.

none, interested citizen - 40; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).

ocean riders - 7; AL300 - Alternatives: Other/New Alternatives or Elements.

private citiaen - 2690; AL100 - Alternatives: Agriculture and Agricultural Leases.

psychotherapist - 1590; AL200 - Alternatives: Elk Management.

rocky mountain elk foundation - 1451; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).

self - 599; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 939; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1123; AL200 - Alternatives: Elk Management. 3047; IT1500 - Impact Topic: Tule Elk (not relating to management).

taxpayer - 2464; MT1000 - Miscellaneous Topics: General Comments.

tomales bay association - 27; AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).

university of mumbai - 2808; MT1000 - Miscellaneous Topics: General Comments.
 www.eatonvillenews.net - 1249; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk).
 www.just-do-something.org - 2839; MT1000 - Miscellaneous Topics: General Comments.
 N/A - 1; AL150 - Alternatives: Ranch Operations, Activities, and Management. 3; AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 4; AL100 - Alternatives: Agriculture and Agricultural Leases. 5; AL200 - Alternatives: Elk Management. 6; AL200 - Alternatives: Elk Management. 8; AL200 - Alternatives: Elk Management. 9; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. 10; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 11; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 12; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL300 - Alternatives: Other/New Alternatives or Elements. 13; AL150 - Alternatives: Ranch Operations, Activities, and Management. 14; AL300 - Alternatives: Other/New Alternatives or Elements. 15; AL150 - Alternatives: Ranch Operations, Activities, and Management. 16; AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. 18; AL200 - Alternatives: Elk Management. 21; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 22; AL200 - Alternatives: Elk Management. 23; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1300 - Issues: Natural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 26; AL150 - Alternatives: Ranch Operations, Activities, and Management. 28; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1300 - Issues: Natural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1100 - Impact Topic: Water Quality and Quantity. IT1500 - Impact Topic: Tule Elk (not relating to management). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change. IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. PN1000 - Purpose And Need: Planning Process And Policy. PO1000 - Park Operations: Guiding Policies, Regs And Laws. 29; AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. 30; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IT1500 - Impact Topic: Tule Elk (not relating to management). IT2100 - Impact Topic: Ranch Complexes (not relating to management). IT2700 - Impact Topic: Other/New Impact Topics. PN8000 - Purpose And Need: Objectives In Taking Action. 31; AL150 - Alternatives: Ranch Operations, Activities, and Management. 32; AL200 - Alternatives: Elk Management. 34; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. PN1000 - Purpose And Need: Planning Process And Policy. 35; AL200 - Alternatives: Elk Management. 36; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change. 37; PN1000 - Purpose And Need: Planning Process And Policy. 39; AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 42; AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1500 - Impact Topic: Tule Elk (not relating to management). 43; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. 44; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 45; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 46; AL150 - Alternatives: Ranch Operations, Activities, and Management. 47; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 112; AL100 - Alternatives: Agriculture and Agricultural Leases. 119; AL100 - Alternatives: Agriculture and Agricultural Leases. 148; AL100 - Alternatives: Agriculture and Agricultural Leases. 154; AL100 -

Alternatives: Agriculture and Agricultural Leases. 174; AL100 - Alternatives: Agriculture and Agricultural Leases. 175; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 178; AL100 - Alternatives: Agriculture and Agricultural Leases. 185; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1000 - Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries). 230; AL100 - Alternatives: Agriculture and Agricultural Leases. 256; AL100 - Alternatives: Agriculture and Agricultural Leases. 275; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 286; AL100 - Alternatives: Agriculture and Agricultural Leases. 287; MT1000 - Miscellaneous Topics: General Comments. 297; AL100 - Alternatives: Agriculture and Agricultural Leases. 316; AL100 - Alternatives: Agriculture and Agricultural Leases. 339; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 352; AL100 - Alternatives: Agriculture and Agricultural Leases. 354; AL100 - Alternatives: Agriculture and Agricultural Leases. 381; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 386; IS1300 - Issues: Natural Resource Management (past, present, and future). 387; MT1000 - Miscellaneous Topics: General Comments. 428; AL100 - Alternatives: Agriculture and Agricultural Leases. 445; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 448; MT1000 - Miscellaneous Topics: General Comments. 451; MT1000 - Miscellaneous Topics: General Comments. 457; AL100 - Alternatives: Agriculture and Agricultural Leases. 474; AL100 - Alternatives: Agriculture and Agricultural Leases. 482; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 488; AL100 - Alternatives: Agriculture and Agricultural Leases. 501; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 502; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 509; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 519; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 525; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). MT1000 - Miscellaneous Topics: General Comments. 550; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 553; MT1000 - Miscellaneous Topics: General Comments. 564; MT1000 - Miscellaneous Topics: General Comments. 566; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 570; MT1000 - Miscellaneous Topics: General Comments. 578; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 589; AL100 - Alternatives: Agriculture and Agricultural Leases. MT1000 - Miscellaneous Topics: General Comments. 593; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 594; AL100 - Alternatives: Agriculture and Agricultural Leases. PN2000 - Purpose And Need: Park Purpose And Significance. 596; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 605; AL200 - Alternatives: Elk Management. 612; AL100 - Alternatives: Agriculture and Agricultural Leases. MT1000 - Miscellaneous Topics: General Comments. 613; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 628; AL100 - Alternatives: Agriculture and Agricultural Leases. 636; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 647; AL100 - Alternatives: Agriculture and Agricultural Leases. MT1000 - Miscellaneous Topics: General Comments. 648; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. MT1000 - Miscellaneous Topics: General Comments. 655; MT1000 - Miscellaneous Topics: General Comments. 660; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management

on Ranchlands (past, present, and future). 662; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 678; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 683; MT1000 - Miscellaneous Topics: General Comments. 685; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). MT1000 - Miscellaneous Topics: General Comments. PN2000 - Purpose And Need: Park Purpose And Significance. 702; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. PN2000 - Purpose And Need: Park Purpose And Significance. 703; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 708; MT1000 - Miscellaneous Topics: General Comments. 737; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 738; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 739; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 763; AL200 - Alternatives: Elk Management. 771; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 777; AL100 - Alternatives: Agriculture and Agricultural Leases. 778; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). MT1000 - Miscellaneous Topics: General Comments. PN2000 - Purpose And Need: Park Purpose And Significance. 780; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 781; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 787; AL100 - Alternatives: Agriculture and Agricultural Leases. MT1000 - Miscellaneous Topics: General Comments. 788; AL100 - Alternatives: Agriculture and Agricultural Leases. MT1000 - Miscellaneous Topics: General Comments. 792; AL150 - Alternatives: Ranch Operations, Activities, and Management. IT1000 - Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries). IT1100 - Impact Topic: Water Quality and Quantity. IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change. 794; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 801; MT1000 - Miscellaneous Topics: General Comments. 802; MT1000 - Miscellaneous Topics: General Comments. 803; AL100 - Alternatives: Agriculture and Agricultural Leases. 804; AL100 - Alternatives: Agriculture and Agricultural Leases. 805; MT1000 - Miscellaneous Topics: General Comments. 814; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 818; MT1000 - Miscellaneous Topics: General Comments. 824; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 825; AL100 - Alternatives: Agriculture and Agricultural Leases. 828; MT1000 - Miscellaneous Topics: General Comments. 829; AL300 - Alternatives: Other/New Alternatives or Elements. 830; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 833; MT1000 - Miscellaneous Topics: General Comments. 843; AL100 - Alternatives: Agriculture and Agricultural Leases. 845; AL100 - Alternatives: Agriculture and Agricultural Leases. 847; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 855; MT1000 - Miscellaneous Topics: General Comments. 859; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 863; AL100 - Alternatives: Agriculture and Agricultural Leases. 872; MT1000 - Miscellaneous Topics: General Comments. 886; AL150 - Alternatives: Ranch Operations, Activities, and Management. 892; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 908; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat

(including non-native wildlife and fish species; not including tule elk). 915; AL200 - Alternatives: Elk Management. MT1000 - Miscellaneous Topics: General Comments. 930; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 935; AL100 - Alternatives: Agriculture and Agricultural Leases. 937; AL200 - Alternatives: Elk Management. 942; AL100 - Alternatives: Agriculture and Agricultural Leases. 955; AL100 - Alternatives: Agriculture and Agricultural Leases. 958; MT1000 - Miscellaneous Topics: General Comments. 964; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1000 - Issues: Environmental Baseline Conditions. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1000 - Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries). IT1100 - Impact Topic: Water Quality and Quantity. IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change. IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. IT2200 - Impact Topic: Socioeconomic Resources. IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. IT2600 - Impact Topic: Park Operations. PN2000 - Purpose And Need: Park Purpose And Significance. PN7100 - Purpose and Need: Purpose and Need for Taking Action. 965; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1200 - Issues: Cultural Resource Management (past, present, and future). IT1000 - Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries). MT1000 - Miscellaneous Topics: General Comments. 972; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. IS1200 - Issues: Cultural Resource Management (past, present, and future). IS1300 - Issues: Natural Resource Management (past, present, and future). 979; MT1000 - Miscellaneous Topics: General Comments. 980; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 981; AL100 - Alternatives: Agriculture and Agricultural Leases. 984; IS1300 - Issues: Natural Resource Management (past, present, and future). 990; CC1000 - Consultation and Coordination: General Comments. 991; AL100 - Alternatives: Agriculture and Agricultural Leases. 994; MT1000 - Miscellaneous Topics: General Comments. 1001; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. 1002; IT1900 - Impact Topic: Visual/Aesthetic Resources. IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. PN2000 - Purpose And Need: Park Purpose And Significance. 1003; AL100 - Alternatives: Agriculture and Agricultural Leases. 1004; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1005; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1007; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1008; AL200 - Alternatives: Elk Management. IT1100 - Impact Topic: Water Quality and Quantity. 1010; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1000 - Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries). IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). PN2000 - Purpose And Need: Park Purpose And Significance. RF1000 - References: Suggested References. 1011; AL100 - Alternatives: Agriculture and Agricultural Leases. 1012; AL150 - Alternatives: Ranch Operations, Activities, and Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1013; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1014; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. IT2500 - Impact Topic: Wilderness. MT1000 - Miscellaneous Topics: General Comments. 1016; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1018; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. IT2200 - Impact Topic: Socioeconomic Resources. PN8000 - Purpose And Need: Objectives In Taking Action. 1019; AL100 - Alternatives: Agriculture and Agricultural Leases. IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1023; AL100 -

Alternatives: Agriculture and Agricultural Leases. 1024; MT1000 - Miscellaneous Topics: General Comments. 1026; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. 1027; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. 1030; MT1000 - Miscellaneous Topics: General Comments. 1031; AL200 - Alternatives: Elk Management. 1032; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1000 - Issues: Environmental Baseline Conditions. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas. IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT2100 - Impact Topic: Ranch Complexes (not relating to management). IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. PN2000 - Purpose And Need: Park Purpose And Significance. 1034; AL100 - Alternatives: Agriculture and Agricultural Leases. 1035; AL200 - Alternatives: Elk Management. IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. 1036; AL100 - Alternatives: Agriculture and Agricultural Leases. IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change. 1037; AL200 - Alternatives: Elk Management. 1039; AL200 - Alternatives: Elk Management. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1040; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1041; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. 1044; AL200 - Alternatives: Elk Management. 1045; MT1000 - Miscellaneous Topics: General Comments. 1046; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1048; AL100 - Alternatives: Agriculture and Agricultural Leases. 1052; AL200 - Alternatives: Elk Management. 1056; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1057; AL100 - Alternatives: Agriculture and Agricultural Leases. 1058; DC1000 - Duplicate Comment: Duplicate of Existing Comment. 1060; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1061; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1062; AL100 - Alternatives: Agriculture and Agricultural Leases. 1064; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1065; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1075; AL200 - Alternatives: Elk Management. 1077; AL200 - Alternatives: Elk Management. 1080; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1081; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. 1083; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1084; MT1000 - Miscellaneous Topics: General Comments. 1088; AL100 - Alternatives: Agriculture and Agricultural Leases. 1090; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1092; AL100 - Alternatives: Agriculture and Agricultural Leases. 1100; AL100 - Alternatives: Agriculture and Agricultural Leases. 1102; AL100 - Alternatives: Agriculture and Agricultural Leases. 1104; AL100 - Alternatives: Agriculture and Agricultural Leases. 1105; MT1000 - Miscellaneous Topics: General Comments. 1108; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1113; AL200 - Alternatives: Elk Management. 1114; AL100 - Alternatives: Agriculture and Agricultural Leases. 1115; AL100 - Alternatives: Agriculture and Agricultural Leases. 1117; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 1124; AL200 - Alternatives: Elk Management. 1125; AL100 - Alternatives: Agriculture and Agricultural Leases. 1126; MT1000 - Miscellaneous Topics: General Comments. 1129; AL200 - Alternatives: Elk Management. 1130; AL200 - Alternatives: Elk Management. 1132; MT1000 - Miscellaneous Topics: General Comments. 1134; MT1000 - Miscellaneous Topics: General Comments. 1143; AL100 - Alternatives: Agriculture and Agricultural Leases. 1144; AL200 - Alternatives: Elk Management. 1147; AL100 - Alternatives: Agriculture and Agricultural Leases. 1149; AL200 - Alternatives: Elk Management. 1155; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1157; AL100 -

Alternatives: Agriculture and Agricultural Leases. 1159; MT1000 - Miscellaneous Topics: General Comments. 1162; AL100 - Alternatives: Agriculture and Agricultural Leases. 1164; AL200 - Alternatives: Elk Management. 1165; AL200 - Alternatives: Elk Management. 1166; AL200 - Alternatives: Elk Management. 1167; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 1171; AL100 - Alternatives: Agriculture and Agricultural Leases. 1172; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1179; AL100 - Alternatives: Agriculture and Agricultural Leases. 1182; AL100 - Alternatives: Agriculture and Agricultural Leases. 1187; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 1189; MT1000 - Miscellaneous Topics: General Comments. 1190; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1191; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1192; AL100 - Alternatives: Agriculture and Agricultural Leases. IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1193; AL200 - Alternatives: Elk Management. 1195; AL200 - Alternatives: Elk Management. 1199; AL100 - Alternatives: Agriculture and Agricultural Leases. 1200; AL100 - Alternatives: Agriculture and Agricultural Leases. AL300 - Alternatives: Other/New Alternatives or Elements. 1206; AL100 - Alternatives: Agriculture and Agricultural Leases. 1207; AL100 - Alternatives: Agriculture and Agricultural Leases. 1209; AL200 - Alternatives: Elk Management. 1213; AL200 - Alternatives: Elk Management. 1215; AL100 - Alternatives: Agriculture and Agricultural Leases. 1217; AL200 - Alternatives: Elk Management. 1219; MT1000 - Miscellaneous Topics: General Comments. 1220; AL100 - Alternatives: Agriculture and Agricultural Leases. 1221; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1223; AL100 - Alternatives: Agriculture and Agricultural Leases. 1225; AL100 - Alternatives: Agriculture and Agricultural Leases. IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. 1226; AL200 - Alternatives: Elk Management. 1227; AL100 - Alternatives: Agriculture and Agricultural Leases. 1228; AL100 - Alternatives: Agriculture and Agricultural Leases. 1230; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1232; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1233; AL100 - Alternatives: Agriculture and Agricultural Leases. 1238; AL200 - Alternatives: Elk Management. 1239; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1252; MT1000 - Miscellaneous Topics: General Comments. 1253; AL100 - Alternatives: Agriculture and Agricultural Leases. 1254; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. 1255; MT1000 - Miscellaneous Topics: General Comments. 1256; AL100 - Alternatives: Agriculture and Agricultural Leases. 1257; AL200 - Alternatives: Elk Management. 1261; AL100 - Alternatives: Agriculture and Agricultural Leases. 1262; AL200 - Alternatives: Elk Management. 1263; AL200 - Alternatives: Elk Management. 1264; AL100 - Alternatives: Agriculture and Agricultural Leases. 1265; MT1000 - Miscellaneous Topics: General Comments. 1267; AL100 - Alternatives: Agriculture and Agricultural Leases. 1271; PN2000 - Purpose And Need: Park Purpose And Significance. 1278; AL100 - Alternatives: Agriculture and Agricultural Leases. 1282; AL200 - Alternatives: Elk Management. 1283; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 1285; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1286; MT1000 - Miscellaneous Topics: General Comments. 1287; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 1289; AL150 - Alternatives: Ranch Operations, Activities, and Management. 1293; AL100 - Alternatives: Agriculture and Agricultural Leases. 1294; AL200 - Alternatives: Elk Management. 1295; AL200 - Alternatives: Elk Management. 1297; AL100 - Alternatives: Agriculture and Agricultural Leases. 1305; MT1000 - Miscellaneous Topics: General Comments. 1308; AL100 - Alternatives: Agriculture and Agricultural Leases. 1310; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 1313; AL200 - Alternatives: Elk Management. 1314; AL200 - Alternatives: Elk Management. 1316; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1324; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1325; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 1331; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1300 - Issues: Natural Resource Management (past, present, and future). 1332; MT1000 - Miscellaneous Topics: General Comments. 1334; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1335; AL100 - Alternatives: Agriculture and Agricultural Leases. 1338; AL200 - Alternatives: Elk Management. 1339; AL200 -

Alternatives: Elk Management. 1340; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1341; MT1000 - Miscellaneous Topics: General Comments. 1348; AL100 - Alternatives: Agriculture and Agricultural Leases. 1349; AL100 - Alternatives: Agriculture and Agricultural Leases. 1351; AL200 - Alternatives: Elk Management. 1352; AL100 - Alternatives: Agriculture and Agricultural Leases. 1354; AL100 - Alternatives: Agriculture and Agricultural Leases. 1355; AL200 - Alternatives: Elk Management. 1356; AL100 - Alternatives: Agriculture and Agricultural Leases. 1357; MT1000 - Miscellaneous Topics: General Comments. 1358; AL200 - Alternatives: Elk Management. 1359; AL100 - Alternatives: Agriculture and Agricultural Leases. 1360; AL200 - Alternatives: Elk Management. 1361; AL100 - Alternatives: Agriculture and Agricultural Leases. 1366; AL100 - Alternatives: Agriculture and Agricultural Leases. 1368; AL100 - Alternatives: Agriculture and Agricultural Leases. 1371; AL100 - Alternatives: Agriculture and Agricultural Leases. 1373; AL100 - Alternatives: Agriculture and Agricultural Leases. 1374; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1375; AL100 - Alternatives: Agriculture and Agricultural Leases. 1379; AL100 - Alternatives: Agriculture and Agricultural Leases. 1380; AL200 - Alternatives: Elk Management. 1382; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1383; MT1000 - Miscellaneous Topics: General Comments. 1389; AL100 - Alternatives: Agriculture and Agricultural Leases. 1391; AL100 - Alternatives: Agriculture and Agricultural Leases. 1393; AL100 - Alternatives: Agriculture and Agricultural Leases. 1394; AL200 - Alternatives: Elk Management. 1395; AL100 - Alternatives: Agriculture and Agricultural Leases. 1399; AL200 - Alternatives: Elk Management. 1402; AL100 - Alternatives: Agriculture and Agricultural Leases. 1406; AL200 - Alternatives: Elk Management. 1409; AL200 - Alternatives: Elk Management. 1410; PN2000 - Purpose And Need: Park Purpose And Significance. 1411; AL200 - Alternatives: Elk Management. 1413; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1414; AL100 - Alternatives: Agriculture and Agricultural Leases. 1415; AL100 - Alternatives: Agriculture and Agricultural Leases. 1417; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1419; AL100 - Alternatives: Agriculture and Agricultural Leases. 1420; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1423; AL300 - Alternatives: Other/New Alternatives or Elements. 1424; AL100 - Alternatives: Agriculture and Agricultural Leases. 1426; AL200 - Alternatives: Elk Management. 1429; AL100 - Alternatives: Agriculture and Agricultural Leases. 1431; AL100 - Alternatives: Agriculture and Agricultural Leases. 1432; AL100 - Alternatives: Agriculture and Agricultural Leases. 1436; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1437; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1440; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1441; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1442; AL200 - Alternatives: Elk Management. 1443; MT1000 - Miscellaneous Topics: General Comments. 1444; AL200 - Alternatives: Elk Management. 1445; AL100 - Alternatives: Agriculture and Agricultural Leases. 1448; AL200 - Alternatives: Elk Management. 1449; AL100 - Alternatives: Agriculture and Agricultural Leases. 1450; AL100 - Alternatives: Agriculture and Agricultural Leases. 1455; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1459; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 1463; AL200 - Alternatives: Elk Management. 1464; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 1466; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1469; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1470; AL100 - Alternatives: Agriculture and Agricultural Leases. 1472; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1474; AL200 - Alternatives: Elk Management. 1478; AL100 - Alternatives: Agriculture and Agricultural Leases. 1480; AL100 - Alternatives: Agriculture and Agricultural Leases. 1481; AL100 - Alternatives: Agriculture and Agricultural Leases. 1482; AL200 - Alternatives: Elk Management. 1494; AL100 - Alternatives: Agriculture and Agricultural Leases. 1495; AL100 - Alternatives: Agriculture and Agricultural Leases. 1496; IS1300 - Issues: Natural Resource Management (past, present, and future). 1499; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1500; AL100 - Alternatives: Agriculture and Agricultural Leases. 1501; MT1000 - Miscellaneous Topics: General Comments. 1502; AL100 - Alternatives: Agriculture and Agricultural Leases. 1503; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1504; AL200 - Alternatives: Elk Management. 1505; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1506; AL100 - Alternatives: Agriculture and Agricultural Leases. 1509; AL100 - Alternatives: Agriculture and Agricultural Leases. 1513; AL200 - Alternatives: Elk Management. 1514; MT1000 - Miscellaneous Topics: General

Comments. 1515; AL100 - Alternatives: Agriculture and Agricultural Leases. PN2000 - Purpose And Need: Park Purpose And Significance. 1516; AL100 - Alternatives: Agriculture and Agricultural Leases. 1518; AL100 - Alternatives: Agriculture and Agricultural Leases. 1522; AL200 - Alternatives: Elk Management. 1523; AL100 - Alternatives: Agriculture and Agricultural Leases. 1524; AL100 - Alternatives: Agriculture and Agricultural Leases. 1525; AL200 - Alternatives: Elk Management. 1527; MT1000 - Miscellaneous Topics: General Comments. 1530; AL200 - Alternatives: Elk Management. 1531; AL100 - Alternatives: Agriculture and Agricultural Leases. 1532; AL100 - Alternatives: Agriculture and Agricultural Leases. 1534; AL200 - Alternatives: Elk Management. 1535; AL200 - Alternatives: Elk Management. 1537; AL100 - Alternatives: Agriculture and Agricultural Leases. 1539; AL100 - Alternatives: Agriculture and Agricultural Leases. 1547; AL100 - Alternatives: Agriculture and Agricultural Leases. 1549; PN2000 - Purpose And Need: Park Purpose And Significance. 1550; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1560; AL200 - Alternatives: Elk Management. 1563; AL100 - Alternatives: Agriculture and Agricultural Leases. 1564; AL100 - Alternatives: Agriculture and Agricultural Leases. 1565; AL100 - Alternatives: Agriculture and Agricultural Leases. 1566; AL200 - Alternatives: Elk Management. 1572; AL100 - Alternatives: Agriculture and Agricultural Leases. 1576; MT1000 - Miscellaneous Topics: General Comments. 1577; AL200 - Alternatives: Elk Management. 1579; AL100 - Alternatives: Agriculture and Agricultural Leases. 1580; AL100 - Alternatives: Agriculture and Agricultural Leases. PN2000 - Purpose And Need: Park Purpose And Significance. 1583; MT1000 - Miscellaneous Topics: General Comments. 1584; AL100 - Alternatives: Agriculture and Agricultural Leases. 1585; AL100 - Alternatives: Agriculture and Agricultural Leases. 1587; MT1000 - Miscellaneous Topics: General Comments. 1589; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1592; AL100 - Alternatives: Agriculture and Agricultural Leases. 1593; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1594; AL100 - Alternatives: Agriculture and Agricultural Leases. 1598; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1599; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1600; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1602; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1605; MT1000 - Miscellaneous Topics: General Comments. 1607; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1610; IS1300 - Issues: Natural Resource Management (past, present, and future). 1613; AL100 - Alternatives: Agriculture and Agricultural Leases. 1614; AL200 - Alternatives: Elk Management. 1615; AL100 - Alternatives: Agriculture and Agricultural Leases. 1619; MT1000 - Miscellaneous Topics: General Comments. 1622; AL100 - Alternatives: Agriculture and Agricultural Leases. 1623; AL200 - Alternatives: Elk Management. 1625; AL200 - Alternatives: Elk Management. 1626; AL200 - Alternatives: Elk Management. 1627; AL100 - Alternatives: Agriculture and Agricultural Leases. 1629; AL100 - Alternatives: Agriculture and Agricultural Leases. 1632; AL100 - Alternatives: Agriculture and Agricultural Leases. 1634; AL100 - Alternatives: Agriculture and Agricultural Leases. 1638; MT1000 - Miscellaneous Topics: General Comments. 1639; AL100 - Alternatives: Agriculture and Agricultural Leases. 1642; MT1000 - Miscellaneous Topics: General Comments. 1643; AL100 - Alternatives: Agriculture and Agricultural Leases. 1645; AL100 - Alternatives: Agriculture and Agricultural Leases. 1650; AL200 - Alternatives: Elk Management. 1654; AL100 - Alternatives: Agriculture and Agricultural Leases. 1659; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1661; AL100 - Alternatives: Agriculture and Agricultural Leases. 1665; AL100 - Alternatives: Agriculture and Agricultural Leases. DC1000 - Duplicate Comment: Duplicate of Existing Comment. 1666; MT1000 - Miscellaneous Topics: General Comments. 1667; DC1000 - Duplicate Comment: Duplicate of Existing Comment. 1670; AL200 - Alternatives: Elk Management. 1671; AL100 - Alternatives: Agriculture and Agricultural Leases. 1673; AL100 - Alternatives: Agriculture and Agricultural Leases. 1674; MT1000 - Miscellaneous Topics: General Comments. 1675; AL100 - Alternatives: Agriculture and Agricultural Leases. 1677; AL100 - Alternatives: Agriculture and Agricultural Leases. 1678; AL100 - Alternatives: Agriculture and Agricultural Leases. 1679; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1681; AL200 - Alternatives: Elk Management. 1686; AL100 - Alternatives: Agriculture and Agricultural Leases. 1687; AL100 - Alternatives: Agriculture and Agricultural Leases. 1688; AL100 - Alternatives: Agriculture and Agricultural Leases. 1692; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1693; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1696; AL200 - Alternatives: Elk Management. 1697; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or

Elements. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1200 - Issues: Cultural Resource Management (past, present, and future). IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. IT2200 - Impact Topic: Socioeconomic Resources. PN7100 - Purpose and Need: Purpose and Need for Taking Action. PN8000 - Purpose And Need: Objectives In Taking Action. 1698; AL100 - Alternatives: Agriculture and Agricultural Leases. 1701; AL100 - Alternatives: Agriculture and Agricultural Leases. 1702; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1706; AL200 - Alternatives: Elk Management. 1707; AL100 - Alternatives: Agriculture and Agricultural Leases. 1710; MT1000 - Miscellaneous Topics: General Comments. 1711; AL200 - Alternatives: Elk Management. 1712; AL100 - Alternatives: Agriculture and Agricultural Leases. 1713; AL100 - Alternatives: Agriculture and Agricultural Leases. 1714; AL100 - Alternatives: Agriculture and Agricultural Leases. 1716; AL100 - Alternatives: Agriculture and Agricultural Leases. 1718; MT1000 - Miscellaneous Topics: General Comments. 1720; AL100 - Alternatives: Agriculture and Agricultural Leases. 1723; AL100 - Alternatives: Agriculture and Agricultural Leases. 1724; AL100 - Alternatives: Agriculture and Agricultural Leases. 1728; AL200 - Alternatives: Elk Management. 1729; AL100 - Alternatives: Agriculture and Agricultural Leases. 1731; AL100 - Alternatives: Agriculture and Agricultural Leases. 1732; AL100 - Alternatives: Agriculture and Agricultural Leases. 1736; AL100 - Alternatives: Agriculture and Agricultural Leases. 1737; AL100 - Alternatives: Agriculture and Agricultural Leases. 1740; AL100 - Alternatives: Agriculture and Agricultural Leases. 1742; AL100 - Alternatives: Agriculture and Agricultural Leases. 1743; AL200 - Alternatives: Elk Management. 1745; MT1000 - Miscellaneous Topics: General Comments. 1750; AL100 - Alternatives: Agriculture and Agricultural Leases. 1753; AL100 - Alternatives: Agriculture and Agricultural Leases. 1757; AL200 - Alternatives: Elk Management. 1758; AL100 - Alternatives: Agriculture and Agricultural Leases. 1760; AL100 - Alternatives: Agriculture and Agricultural Leases. 1763; AL100 - Alternatives: Agriculture and Agricultural Leases. 1765; AL100 - Alternatives: Agriculture and Agricultural Leases. 1769; AL100 - Alternatives: Agriculture and Agricultural Leases. 1772; MT1000 - Miscellaneous Topics: General Comments. 1773; AL100 - Alternatives: Agriculture and Agricultural Leases. 1775; MT1000 - Miscellaneous Topics: General Comments. 1776; AL100 - Alternatives: Agriculture and Agricultural Leases. 1777; AL100 - Alternatives: Agriculture and Agricultural Leases. 1784; AL200 - Alternatives: Elk Management. 1786; AL200 - Alternatives: Elk Management. 1793; AL100 - Alternatives: Agriculture and Agricultural Leases. 1794; MT1000 - Miscellaneous Topics: General Comments. 1797; AL200 - Alternatives: Elk Management. 1799; AL100 - Alternatives: Agriculture and Agricultural Leases. 1800; MT1000 - Miscellaneous Topics: General Comments. 1804; MT1000 - Miscellaneous Topics: General Comments. 1807; AL200 - Alternatives: Elk Management. 1814; MT1000 - Miscellaneous Topics: General Comments. 1815; AL100 - Alternatives: Agriculture and Agricultural Leases. 1820; AL100 - Alternatives: Agriculture and Agricultural Leases. 1823; AL100 - Alternatives: Agriculture and Agricultural Leases. 1825; AL200 - Alternatives: Elk Management. 1826; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 1832; AL100 - Alternatives: Agriculture and Agricultural Leases. 1835; MT1000 - Miscellaneous Topics: General Comments. 1836; AL100 - Alternatives: Agriculture and Agricultural Leases. 1837; AL100 - Alternatives: Agriculture and Agricultural Leases. 1838; AL200 - Alternatives: Elk Management. 1840; MT1000 - Miscellaneous Topics: General Comments. 1843; AL100 - Alternatives: Agriculture and Agricultural Leases. 1846; AL100 - Alternatives: Agriculture and Agricultural Leases. 1848; AL100 - Alternatives: Agriculture and Agricultural Leases. 1851; AL100 - Alternatives: Agriculture and Agricultural Leases. 1853; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 1854; AL200 - Alternatives: Elk Management. 1855; AL100 - Alternatives: Agriculture and Agricultural Leases. 1857; AL100 - Alternatives: Agriculture and Agricultural Leases. 1858; AL100 - Alternatives: Agriculture and Agricultural Leases. 1859; AL100 - Alternatives: Agriculture and Agricultural Leases. 1861; AL200 - Alternatives: Elk Management. 1863; MT1000 - Miscellaneous Topics: General Comments. 1865; AL100 - Alternatives: Agriculture and Agricultural Leases. 1866; AL200 - Alternatives: Elk Management. 1868; AL100 - Alternatives: Agriculture and Agricultural Leases. 1869; AL100 - Alternatives: Agriculture and Agricultural Leases. 1870; AL100 - Alternatives: Agriculture and Agricultural Leases. 1871; AL100 - Alternatives: Agriculture and Agricultural Leases. 1875; AL100 - Alternatives: Agriculture and Agricultural Leases. 1878; AL100 - Alternatives: Agriculture and Agricultural Leases. 1880; AL100 - Alternatives: Agriculture and Agricultural Leases. 1881; AL100 - Alternatives: Agriculture and Agricultural Leases. 1884; AL100 - Alternatives: Agriculture and Agricultural Leases. 1885; AL200 - Alternatives: Elk Management. 1886; AL100 - Alternatives: Agriculture and Agricultural Leases. 1888; AL100 - Alternatives: Agriculture and Agricultural Leases. 1889; AL100 - Alternatives: Agriculture and Agricultural Leases. 1890; MT1000 - Miscellaneous Topics: General

Comments. 1891; AL100 - Alternatives: Agriculture and Agricultural Leases. 1892; AL100 - Alternatives: Agriculture and Agricultural Leases. 1894; MT1000 - Miscellaneous Topics: General Comments. 1897; AL100 - Alternatives: Agriculture and Agricultural Leases. 1899; AL100 - Alternatives: Agriculture and Agricultural Leases. 1900; AL200 - Alternatives: Elk Management. 1901; AL200 - Alternatives: Elk Management. 1904; AL100 - Alternatives: Agriculture and Agricultural Leases. 1906; AL100 - Alternatives: Agriculture and Agricultural Leases. 1908; AL100 - Alternatives: Agriculture and Agricultural Leases. 1909; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IT1900 - Impact Topic: Visual/Aesthetic Resources. 1911; AL100 - Alternatives: Agriculture and Agricultural Leases. 1915; AL100 - Alternatives: Agriculture and Agricultural Leases. 1917; PN2000 - Purpose And Need: Park Purpose And Significance. 1918; AL100 - Alternatives: Agriculture and Agricultural Leases. 1922; AL100 - Alternatives: Agriculture and Agricultural Leases. 1923; AL200 - Alternatives: Elk Management. 1927; AL200 - Alternatives: Elk Management. 1930; AL200 - Alternatives: Elk Management. 1931; AL200 - Alternatives: Elk Management. 1935; AL100 - Alternatives: Agriculture and Agricultural Leases. 1937; MT1000 - Miscellaneous Topics: General Comments. 1939; AL100 - Alternatives: Agriculture and Agricultural Leases. IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). IT1900 - Impact Topic: Visual/Aesthetic Resources. IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. PN2000 - Purpose And Need: Park Purpose And Significance. 1940; MT1000 - Miscellaneous Topics: General Comments. 1941; AL100 - Alternatives: Agriculture and Agricultural Leases. 1943; AL100 - Alternatives: Agriculture and Agricultural Leases. 1944; AL100 - Alternatives: Agriculture and Agricultural Leases. 1947; MT1000 - Miscellaneous Topics: General Comments. 1948; MT1000 - Miscellaneous Topics: General Comments. 1950; AL100 - Alternatives: Agriculture and Agricultural Leases. 1951; AL100 - Alternatives: Agriculture and Agricultural Leases. 1953; AL100 - Alternatives: Agriculture and Agricultural Leases. 1955; AL100 - Alternatives: Agriculture and Agricultural Leases. PN2000 - Purpose And Need: Park Purpose And Significance. 1956; AL100 - Alternatives: Agriculture and Agricultural Leases. 1959; IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. 1960; AL100 - Alternatives: Agriculture and Agricultural Leases. 1961; AL100 - Alternatives: Agriculture and Agricultural Leases. 1962; AL100 - Alternatives: Agriculture and Agricultural Leases. 1963; AL100 - Alternatives: Agriculture and Agricultural Leases. 1971; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1972; AL100 - Alternatives: Agriculture and Agricultural Leases. 1973; MT1000 - Miscellaneous Topics: General Comments. 1976; AL100 - Alternatives: Agriculture and Agricultural Leases. 1979; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 1982; AL100 - Alternatives: Agriculture and Agricultural Leases. 1985; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 1988; AL100 - Alternatives: Agriculture and Agricultural Leases. 1990; AL100 - Alternatives: Agriculture and Agricultural Leases. 1992; AL100 - Alternatives: Agriculture and Agricultural Leases. 1996; AL100 - Alternatives: Agriculture and Agricultural Leases. 2001; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2002; MT1000 - Miscellaneous Topics: General Comments. 2003; AL200 - Alternatives: Elk Management. 2004; AL200 - Alternatives: Elk Management. 2005; MT1000 - Miscellaneous Topics: General Comments. 2006; AL100 - Alternatives: Agriculture and Agricultural Leases. 2007; AL100 - Alternatives: Agriculture and Agricultural Leases. 2008; AL100 - Alternatives: Agriculture and Agricultural Leases. 2009; AL200 - Alternatives: Elk Management. 2010; AL100 - Alternatives: Agriculture and Agricultural Leases. 2011; AL100 - Alternatives: Agriculture and Agricultural Leases. 2012; AL100 - Alternatives: Agriculture and Agricultural Leases. 2013; AL100 - Alternatives: Agriculture and Agricultural Leases. 2014; AL100 - Alternatives: Agriculture and Agricultural Leases. 2015; AL100 - Alternatives: Agriculture and Agricultural Leases. 2016; AL200 - Alternatives: Elk Management. 2018; AL100 - Alternatives: Agriculture and Agricultural Leases. 2019; MT1000 - Miscellaneous Topics: General Comments. 2020; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2021; AL100 - Alternatives: Agriculture and Agricultural Leases. 2022; AL100 - Alternatives: Agriculture and Agricultural Leases. 2023; AL100 - Alternatives: Agriculture and Agricultural Leases. 2026; AL200 - Alternatives: Elk Management. 2027; AL100 - Alternatives: Agriculture and Agricultural Leases. 2028; AL100 - Alternatives: Agriculture and Agricultural Leases. 2031; AL100 - Alternatives: Agriculture and Agricultural Leases. 2032; AL100 - Alternatives: Agriculture and Agricultural Leases. 2033; AL100 - Alternatives: Agriculture and Agricultural Leases. 2034; AL100 - Alternatives: Agriculture and Agricultural Leases. 2035; AL100 - Alternatives: Agriculture and Agricultural Leases. 2036; AL100 - Alternatives: Agriculture and Agricultural Leases. 2037; AL100 - Alternatives: Agriculture and Agricultural Leases. 2038; AL100 - Alternatives:

2204; AL200 - Alternatives: Elk Management. 2205; AL100 - Alternatives: Agriculture and Agricultural Leases. 2206; AL200 - Alternatives: Elk Management. 2208; AL100 - Alternatives: Agriculture and Agricultural Leases. 2209; MT1000 - Miscellaneous Topics: General Comments. 2210; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2212; AL100 - Alternatives: Agriculture and Agricultural Leases. 2215; AL100 - Alternatives: Agriculture and Agricultural Leases. 2220; MT1000 - Miscellaneous Topics: General Comments. 2222; MT1000 - Miscellaneous Topics: General Comments. 2223; MT1000 - Miscellaneous Topics: General Comments. 2224; AL200 - Alternatives: Elk Management. 2225; AL100 - Alternatives: Agriculture and Agricultural Leases. 2226; AL200 - Alternatives: Elk Management. 2227; AL200 - Alternatives: Elk Management. 2229; AL100 - Alternatives: Agriculture and Agricultural Leases. 2230; AL100 - Alternatives: Agriculture and Agricultural Leases. 2232; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2234; AL100 - Alternatives: Agriculture and Agricultural Leases. 2237; MT1000 - Miscellaneous Topics: General Comments. 2238; AL100 - Alternatives: Agriculture and Agricultural Leases. 2239; AL200 - Alternatives: Elk Management. 2243; AL100 - Alternatives: Agriculture and Agricultural Leases. 2245; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2249; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2253; MT1000 - Miscellaneous Topics: General Comments. 2254; MT1000 - Miscellaneous Topics: General Comments. 2255; AL100 - Alternatives: Agriculture and Agricultural Leases. 2257; AL100 - Alternatives: Agriculture and Agricultural Leases. 2259; MT1000 - Miscellaneous Topics: General Comments. 2262; MT1000 - Miscellaneous Topics: General Comments. 2263; AL100 - Alternatives: Agriculture and Agricultural Leases. 2266; AL100 - Alternatives: Agriculture and Agricultural Leases. 2267; AL100 - Alternatives: Agriculture and Agricultural Leases. 2270; AL100 - Alternatives: Agriculture and Agricultural Leases. 2271; AL200 - Alternatives: Elk Management. 2273; AL100 - Alternatives: Agriculture and Agricultural Leases. 2274; AL100 - Alternatives: Agriculture and Agricultural Leases. 2275; AL200 - Alternatives: Elk Management. 2278; AL100 - Alternatives: Agriculture and Agricultural Leases. 2279; PN2000 - Purpose And Need: Park Purpose And Significance. 2280; MT1000 - Miscellaneous Topics: General Comments. 2282; AL100 - Alternatives: Agriculture and Agricultural Leases. 2284; AL100 - Alternatives: Agriculture and Agricultural Leases. 2286; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2287; MT1000 - Miscellaneous Topics: General Comments. 2288; AL100 - Alternatives: Agriculture and Agricultural Leases. 2289; AL100 - Alternatives: Agriculture and Agricultural Leases. 2293; MT1000 - Miscellaneous Topics: General Comments. 2297; AL200 - Alternatives: Elk Management. 2298; MT1000 - Miscellaneous Topics: General Comments. 2300; AL200 - Alternatives: Elk Management. 2301; MT1000 - Miscellaneous Topics: General Comments. 2306; MT1000 - Miscellaneous Topics: General Comments. 2307; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2309; MT1000 - Miscellaneous Topics: General Comments. 2313; MT1000 - Miscellaneous Topics: General Comments. 2314; AL100 - Alternatives: Agriculture and Agricultural Leases. 2326; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2328; AL200 - Alternatives: Elk Management. 2331; AL100 - Alternatives: Agriculture and Agricultural Leases. 2336; AL200 - Alternatives: Elk Management. 2338; AL100 - Alternatives: Agriculture and Agricultural Leases. 2340; AL100 - Alternatives: Agriculture and Agricultural Leases. 2341; AL100 - Alternatives: Agriculture and Agricultural Leases. 2342; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2343; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2344; AL100 - Alternatives: Agriculture and Agricultural Leases. 2345; AL100 - Alternatives: Agriculture and Agricultural Leases. 2346; AL100 - Alternatives: Agriculture and Agricultural Leases. 2349; AL100 - Alternatives: Agriculture and Agricultural Leases. 2353; AL100 - Alternatives: Agriculture and Agricultural Leases. 2354; MT1000 - Miscellaneous Topics: General Comments. 2355; AL100 - Alternatives: Agriculture and Agricultural Leases. 2357; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2359; MT1000 - Miscellaneous Topics: General Comments. 2360; AL200 - Alternatives: Elk Management. 2361; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2362; MT1000 - Miscellaneous Topics: General Comments. 2363; AL200 - Alternatives: Elk Management. 2364; AL100 - Alternatives: Agriculture and Agricultural Leases. 2366; AL100 - Alternatives: Agriculture and Agricultural Leases. 2368; AL100 - Alternatives: Agriculture and Agricultural Leases. 2369; AL100 - Alternatives: Agriculture and Agricultural Leases. 2371; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2373; IS1300 - Issues: Natural Resource Management (past, present, and future). 2374; MT1000 - Miscellaneous Topics: General Comments. 2376; AL100 - Alternatives: Agriculture and Agricultural Leases. 2378; AL200 - Alternatives: Elk Management. 2380; AL200 - Alternatives: Elk Management. 2387; AL100 - Alternatives: Agriculture and Agricultural Leases. 2388; AL100 - Alternatives: Agriculture and

Agricultural Leases. AL200 - Alternatives: Elk Management. 2390; AL100 - Alternatives: Agriculture and Agricultural Leases. 2391; MT1000 - Miscellaneous Topics: General Comments. 2393; MT1000 - Miscellaneous Topics: General Comments. 2398; AL200 - Alternatives: Elk Management. 2403; AL200 - Alternatives: Elk Management. 2406; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2407; AL100 - Alternatives: Agriculture and Agricultural Leases. 2408; AL200 - Alternatives: Elk Management. 2410; AL100 - Alternatives: Agriculture and Agricultural Leases. 2411; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 2415; AL100 - Alternatives: Agriculture and Agricultural Leases. 2419; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. MT1000 - Miscellaneous Topics: General Comments. 2420; AL100 - Alternatives: Agriculture and Agricultural Leases. 2421; AL200 - Alternatives: Elk Management. 2423; AL200 - Alternatives: Elk Management. 2428; AL100 - Alternatives: Agriculture and Agricultural Leases. 2429; AL100 - Alternatives: Agriculture and Agricultural Leases. 2430; MT1000 - Miscellaneous Topics: General Comments. 2432; AL100 - Alternatives: Agriculture and Agricultural Leases. 2437; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 2440; AL200 - Alternatives: Elk Management. 2441; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2446; AL100 - Alternatives: Agriculture and Agricultural Leases. 2451; MT1000 - Miscellaneous Topics: General Comments. 2454; AL100 - Alternatives: Agriculture and Agricultural Leases. 2456; AL100 - Alternatives: Agriculture and Agricultural Leases. 2457; AL200 - Alternatives: Elk Management. 2458; AL200 - Alternatives: Elk Management. 2462; AL200 - Alternatives: Elk Management. 2466; AL200 - Alternatives: Elk Management. 2470; AL100 - Alternatives: Agriculture and Agricultural Leases. 2471; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2473; AL200 - Alternatives: Elk Management. 2475; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2478; AL200 - Alternatives: Elk Management. 2480; AL100 - Alternatives: Agriculture and Agricultural Leases. 2482; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 2484; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2485; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2486; AL100 - Alternatives: Agriculture and Agricultural Leases. 2487; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2489; AL100 - Alternatives: Agriculture and Agricultural Leases. 2490; AL100 - Alternatives: Agriculture and Agricultural Leases. 2491; AL100 - Alternatives: Agriculture and Agricultural Leases. 2492; AL200 - Alternatives: Elk Management. 2497; AL100 - Alternatives: Agriculture and Agricultural Leases. 2499; MT1000 - Miscellaneous Topics: General Comments. 2500; MT1000 - Miscellaneous Topics: General Comments. 2503; AL100 - Alternatives: Agriculture and Agricultural Leases. 2510; AL100 - Alternatives: Agriculture and Agricultural Leases. 2511; MT1000 - Miscellaneous Topics: General Comments. 2512; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2513; AL200 - Alternatives: Elk Management. 2514; AL100 - Alternatives: Agriculture and Agricultural Leases. 2516; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2517; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2519; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2522; AL100 - Alternatives: Agriculture and Agricultural Leases. 2527; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2529; MT1000 - Miscellaneous Topics: General Comments. 2531; AL100 - Alternatives: Agriculture and Agricultural Leases. 2533; MT1000 - Miscellaneous Topics: General Comments. 2534; AL200 - Alternatives: Elk Management. 2535; AL100 - Alternatives: Agriculture and Agricultural Leases. 2536; MT1000 - Miscellaneous Topics: General Comments. 2539; MT1000 - Miscellaneous Topics: General Comments. 2540; AL200 - Alternatives: Elk Management. 2543; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2544; AL200 - Alternatives: Elk Management. 2545; AL100 - Alternatives: Agriculture and Agricultural Leases. 2546; AL100 - Alternatives: Agriculture and Agricultural Leases. 2547; AL100 - Alternatives: Agriculture and Agricultural Leases. 2554; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 2555; MT1000 - Miscellaneous Topics: General Comments. 2558; AL100 - Alternatives: Agriculture and Agricultural Leases. 2560; AL200 - Alternatives: Elk Management. 2561; MT1000 - Miscellaneous Topics: General Comments. 2568; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2570; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2571; AL200 - Alternatives: Elk Management. 2572; AL100 - Alternatives: Agriculture and Agricultural Leases. 2576; AL200 -

Alternatives: Elk Management. 2577; AL200 - Alternatives: Elk Management. 2578; MT1000 - Miscellaneous Topics: General Comments. 2579; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2582; AL100 - Alternatives: Agriculture and Agricultural Leases. 2584; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2586; MT1000 - Miscellaneous Topics: General Comments. 2587; AL200 - Alternatives: Elk Management. 2589; AL100 - Alternatives: Agriculture and Agricultural Leases. 2590; AL200 - Alternatives: Elk Management. 2592; MT1000 - Miscellaneous Topics: General Comments. 2595; AL200 - Alternatives: Elk Management. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2607; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2608; AL100 - Alternatives: Agriculture and Agricultural Leases. 2612; AL100 - Alternatives: Agriculture and Agricultural Leases. 2613; AL100 - Alternatives: Agriculture and Agricultural Leases. 2614; MT1000 - Miscellaneous Topics: General Comments. 2615; AL200 - Alternatives: Elk Management. 2616; IS1300 - Issues: Natural Resource Management (past, present, and future). 2620; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2623; AL200 - Alternatives: Elk Management. 2625; AL200 - Alternatives: Elk Management. 2626; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2630; AL200 - Alternatives: Elk Management. 2631; AL100 - Alternatives: Agriculture and Agricultural Leases. 2632; AL200 - Alternatives: Elk Management. 2638; AL100 - Alternatives: Agriculture and Agricultural Leases. 2640; AL100 - Alternatives: Agriculture and Agricultural Leases. 2641; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 2644; AL200 - Alternatives: Elk Management. 2645; AL200 - Alternatives: Elk Management. 2646; AL100 - Alternatives: Agriculture and Agricultural Leases. 2647; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2652; AL200 - Alternatives: Elk Management. 2653; AL100 - Alternatives: Agriculture and Agricultural Leases. 2654; AL100 - Alternatives: Agriculture and Agricultural Leases. 2657; AL200 - Alternatives: Elk Management. 2658; AL200 - Alternatives: Elk Management. 2659; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2660; AL200 - Alternatives: Elk Management. 2662; AL200 - Alternatives: Elk Management. 2668; AL200 - Alternatives: Elk Management. 2670; MT1000 - Miscellaneous Topics: General Comments. 2672; AL100 - Alternatives: Agriculture and Agricultural Leases. 2676; AL100 - Alternatives: Agriculture and Agricultural Leases. 2677; AL200 - Alternatives: Elk Management. 2683; AL100 - Alternatives: Agriculture and Agricultural Leases. 2684; AL100 - Alternatives: Agriculture and Agricultural Leases. 2685; AL300 - Alternatives: Other/New Alternatives or Elements. 2687; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2689; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2691; AL100 - Alternatives: Agriculture and Agricultural Leases. 2692; AL200 - Alternatives: Elk Management. 2694; AL200 - Alternatives: Elk Management. 2696; AL100 - Alternatives: Agriculture and Agricultural Leases. 2698; AL200 - Alternatives: Elk Management. 2699; IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 2704; AL200 - Alternatives: Elk Management. 2705; AL100 - Alternatives: Agriculture and Agricultural Leases. 2707; AL100 - Alternatives: Agriculture and Agricultural Leases. 2708; MT1000 - Miscellaneous Topics: General Comments. 2709; AL100 - Alternatives: Agriculture and Agricultural Leases. 2714; AL200 - Alternatives: Elk Management. 2715; AL200 - Alternatives: Elk Management. 2716; AL100 - Alternatives: Agriculture and Agricultural Leases. 2719; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2724; AL100 - Alternatives: Agriculture and Agricultural Leases. 2725; AL200 - Alternatives: Elk Management. 2729; AL200 - Alternatives: Elk Management. 2730; AL100 - Alternatives: Agriculture and Agricultural Leases. 2737; AL200 - Alternatives: Elk Management. 2738; AL200 - Alternatives: Elk Management. 2739; AL100 - Alternatives: Agriculture and Agricultural Leases. 2742; AL100 - Alternatives: Agriculture and Agricultural Leases. 2747; AL100 - Alternatives: Agriculture and Agricultural Leases. 2748; AL100 - Alternatives: Agriculture and Agricultural Leases. 2750; AL100 - Alternatives: Agriculture and Agricultural Leases. 2754; AL100 - Alternatives: Agriculture and Agricultural Leases. 2755; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2757; AL100 - Alternatives: Agriculture and Agricultural Leases. 2758; AL200 - Alternatives: Elk Management. 2759; AL200 - Alternatives: Elk Management. 2760; AL100 - Alternatives: Agriculture and Agricultural Leases. 2764; AL100 - Alternatives: Agriculture and Agricultural Leases. 2765; AL200 - Alternatives: Elk Management. 2768; MT1000 - Miscellaneous Topics: General Comments. 2770; AL100 - Alternatives: Agriculture and Agricultural Leases. 2773; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2774; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2775; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 -

Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1200 - Issues: Cultural Resource Management (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. 2778; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2779; AL100 - Alternatives: Agriculture and Agricultural Leases. 2781; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2786; AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). MT1000 - Miscellaneous Topics: General Comments. 2787; AL100 - Alternatives: Agriculture and Agricultural Leases. 2789; AL100 - Alternatives: Agriculture and Agricultural Leases. 2790; MT1000 - Miscellaneous Topics: General Comments. 2794; MT1000 - Miscellaneous Topics: General Comments. 2803; AL100 - Alternatives: Agriculture and Agricultural Leases. 2812; MT1000 - Miscellaneous Topics: General Comments. 2813; MT1000 - Miscellaneous Topics: General Comments. 2814; MT1000 - Miscellaneous Topics: General Comments. 2815; MT1000 - Miscellaneous Topics: General Comments. 2816; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2817; AL200 - Alternatives: Elk Management. 2818; AL100 - Alternatives: Agriculture and Agricultural Leases. 2819; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2821; AL100 - Alternatives: Agriculture and Agricultural Leases. 2822; MT1000 - Miscellaneous Topics: General Comments. 2825; AL100 - Alternatives: Agriculture and Agricultural Leases. 2826; AL100 - Alternatives: Agriculture and Agricultural Leases. 2830; MT1000 - Miscellaneous Topics: General Comments. 2831; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). 2835; AL100 - Alternatives: Agriculture and Agricultural Leases. 2838; AL200 - Alternatives: Elk Management. 2843; AL100 - Alternatives: Agriculture and Agricultural Leases. 2844; AL100 - Alternatives: Agriculture and Agricultural Leases. 2845; MT1000 - Miscellaneous Topics: General Comments. 2846; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2847; AL200 - Alternatives: Elk Management. 2848; AL100 - Alternatives: Agriculture and Agricultural Leases. 2851; AL300 - Alternatives: Other/New Alternatives or Elements. 2852; AL100 - Alternatives: Agriculture and Agricultural Leases. 2854; AL100 - Alternatives: Agriculture and Agricultural Leases. 2855; IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2856; AL100 - Alternatives: Agriculture and Agricultural Leases. 2857; MT1000 - Miscellaneous Topics: General Comments. 2858; AL100 - Alternatives: Agriculture and Agricultural Leases. 2859; AL100 - Alternatives: Agriculture and Agricultural Leases. 2861; AL200 - Alternatives: Elk Management. 2862; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2865; MT1000 - Miscellaneous Topics: General Comments. 2866; AL100 - Alternatives: Agriculture and Agricultural Leases. 2870; AL100 - Alternatives: Agriculture and Agricultural Leases. 2874; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2876; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2877; AL100 - Alternatives: Agriculture and Agricultural Leases. 2878; AL100 - Alternatives: Agriculture and Agricultural Leases. 2882; AL100 - Alternatives: Agriculture and Agricultural Leases. 2883; MT1000 - Miscellaneous Topics: General Comments. 2884; AL200 - Alternatives: Elk Management. 2887; AL100 - Alternatives: Agriculture and Agricultural Leases. 2888; MT1000 - Miscellaneous Topics: General Comments. 2902; AL100 - Alternatives: Agriculture and Agricultural Leases. 2904; AL100 - Alternatives: Agriculture and Agricultural Leases. 2906; AL100 - Alternatives: Agriculture and Agricultural Leases. 2908; AL100 - Alternatives: Agriculture and Agricultural Leases. 2909; AL100 - Alternatives: Agriculture and Agricultural Leases. 2910; AL100 - Alternatives: Agriculture and Agricultural Leases. 2914; AL100 - Alternatives: Agriculture and Agricultural Leases. 2921; AL200 - Alternatives: Elk Management. 2922; MT1000 - Miscellaneous Topics: General Comments. 2927; MT1000 - Miscellaneous Topics: General Comments. 2930; AL200 - Alternatives: Elk Management. 2931; AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 2932; AL100 - Alternatives: Agriculture and Agricultural Leases. 2934; AL200 - Alternatives: Elk Management. 2935; AL100 - Alternatives: Agriculture and Agricultural Leases. 2941; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2942; MT1000 - Miscellaneous Topics: General Comments. 2946; MT1000 - Miscellaneous Topics: General Comments. 2949; AL100 - Alternatives: Agriculture and Agricultural Leases. 2953; AL200 - Alternatives: Elk Management. 2954; AL100 - Alternatives: Agriculture and Agricultural Leases. 2955; AL200 - Alternatives: Elk Management. 2957; AL200 - Alternatives: Elk Management. 2958; AL100 - Alternatives: Agriculture and Agricultural Leases. 2959; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 2961; AL200 - Alternatives: Elk

Management. 2964; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. 2965; AL100 - Alternatives: Agriculture and Agricultural Leases. 2969; MT1000 - Miscellaneous Topics: General Comments. 2971; AL200 - Alternatives: Elk Management. 2977; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 2978; AL100 - Alternatives: Agriculture and Agricultural Leases. IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change. 2981; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. IS1200 - Issues: Cultural Resource Management (past, present, and future). MT1000 - Miscellaneous Topics: General Comments. 2982; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1300 - Issues: Natural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN8000 - Purpose And Need: Objectives In Taking Action. 2984; AL200 - Alternatives: Elk Management. 2985; AL100 - Alternatives: Agriculture and Agricultural Leases. 2988; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1300 - Issues: Natural Resource Management (past, present, and future). PN2000 - Purpose And Need: Park Purpose And Significance. PN7100 - Purpose and Need: Purpose and Need for Taking Action. RF1000 - References: Suggested References. 2989; AL200 - Alternatives: Elk Management. 2991; AL100 - Alternatives: Agriculture and Agricultural Leases. 2997; AL200 - Alternatives: Elk Management. 2999; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. 3001; AL100 - Alternatives: Agriculture and Agricultural Leases. 3005; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. 3007; AL100 - Alternatives: Agriculture and Agricultural Leases. 3009; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 3010; AL100 - Alternatives: Agriculture and Agricultural Leases. 3012; AL100 - Alternatives: Agriculture and Agricultural Leases. 3014; AL200 - Alternatives: Elk Management. 3015; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. 3017; AL200 - Alternatives: Elk Management. 3018; AL100 - Alternatives: Agriculture and Agricultural Leases. 3020; AL200 - Alternatives: Elk Management. 3025; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. 3028; AL100 - Alternatives: Agriculture and Agricultural Leases. 3030; IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). 3031; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. 3035; AL100 - Alternatives: Agriculture and Agricultural Leases. 3037; AL150 - Alternatives: Ranch Operations, Activities, and Management. 3038; AL100 - Alternatives: Agriculture and Agricultural Leases. IS1300 - Issues: Natural Resource Management (past, present, and future). 3045; IS1300 - Issues: Natural Resource Management (past, present, and future). IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). 3046; IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk). 3050; AL100 - Alternatives: Agriculture and Agricultural Leases. IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. 3055; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. PN1000 - Purpose And Need: Planning Process And Policy. 3056; AL200 - Alternatives: Elk Management. 3058; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. 3059; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. 3060; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. DC1000 - Duplicate

Comment: Duplicate of Existing Comment. IS1200 - Issues: Cultural Resource Management (past, present, and future). IS1300 - Issues: Natural Resource Management (past, present, and future). IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures. IT2700 - Impact Topic: Other/New Impact Topics. PN2000 - Purpose And Need: Park Purpose And Significance. PN7100 - Purpose and Need: Purpose and Need for Taking Action. 3061; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. CC1000 - Consultation and Coordination: General Comments. IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). PN1000 - Purpose And Need: Planning Process And Policy. 3062; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IT2500 - Impact Topic: Wilderness. 3063; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). ON1000 - Other NEPA Issues: General Comments. 3073; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). 3075; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 3087; AL100 - Alternatives: Agriculture and Agricultural Leases. 3089; AL100 - Alternatives: Agriculture and Agricultural Leases. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). 3090; AL100 - Alternatives: Agriculture and Agricultural Leases. 3093; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. AL300 - Alternatives: Other/New Alternatives or Elements.

University/Professional Society

- Sonoma State University - 3074; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1200 - Issues: Cultural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT2200 - Impact Topic: Socioeconomic Resources. ON1000 - Other NEPA Issues: General Comments. PN1000 - Purpose And Need: Planning Process And Policy. PN7100 - Purpose and Need: Purpose and Need for Taking Action.
- UC Cooperative Extension - 2718; AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future).
- University of California Cooperative Extension - 3022; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management. AL200 - Alternatives: Elk Management. IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1200 - Issues: Cultural Resource Management (past, present, and future). IS1300 - Issues: Natural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT2700 - Impact Topic: Other/New Impact Topics. RF1000 - References: Suggested References. 3023; AL200 - Alternatives: Elk Management.

ERRATA- September 29, 2014

A portion of correspondence ID 1032 was not captured when scanning the document for entry into the electronic database. In addition, correspondence ID 3094 was inadvertently left out of the initial comment analysis process. These errors have been corrected and the correspondences were assigned the codes shown below.

Index By Organization Type

Conservation/Preservation

Committee for the Preservation of the Tule Elk - 1032; AL100 - Alternatives: Agriculture and Agricultural Leases. AL150 - Alternatives: Ranch Operations, Activities, and Management . AL300 - Alternatives: Other/New Alternatives or Elements. IS1000 - Issues: Environmental Baseline Conditions. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1300 - Issues: Natural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future). IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas. IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed). IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species). IT2100 - Impact Topic: Ranch Complexes (not relating to management). IT2300 - Impact Topic: Visitor Use, Experience, and Recreation. PN2000 - Purpose And Need: Park Purpose And Significance. **3094;** AL100 - Alternatives: Agriculture and Agricultural Leases. AL300 - Alternatives: Other/New Alternatives or Elements. CC1000 - Consultation and Coordination: General Comments. IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future). IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future). IS1300 - Issues: Natural Resource Management (past, present, and future). IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future).

APPENDIX B: INDEX BY CODE REPORT

AL100 - Alternatives: Agriculture and Agricultural Leases

Nature Conservancy - 1347
United States Citizen - 2414
- - 1214
American citizen - 2443
Andean Tapir Fund - 58
Any that stand for Wildlife and their PROTECTION & WELFARE - 298
BACCHARIS INSTITUTE - 2933
Backcountry Horsemen of Utah - 997
California Cattlemen's Association - 3032
Center for Biological Diversity - 867
Chiefland Vet Svc - 2337
Citizen and Taxpayer - 191
ClearView Psychotherapy Associates - 1683
Coldwell Banker - 1748
Datacomex - 2459
Defenders of Wildlife - 1833
Dr. - 767 , 1813
Environmental Action Committee of West Marin - 1140
Environmental Learning for Kids - 1528
GBT Nunes & Co - 3072
HSUS - 2549
Historic B Ranch - 3071
IDA (IN DEFENCE OF ANIMALS) - 1208
IDA member - 2564
In Defense for Animals - 2115
In Defense of Animals - 1022 , 1218 , 2131 , 2600 , 2753 , 2792 , 3064
In Defense of Animals supporters - 625
MALT - 2701
MRS - 2637
Marin Agricultural Land Trust - 3068
Marin Audubon Society - 3049
Marin Conservation League - 2960
Marin County Agricultural Commissioner - 3057
Marin County Bicycle Coalition - 3000
Marin Resource Conservation District - 3085
McClelland's Dairy - 3080 , 3081
McClure Dairy, Inc - 3069
Member - 2824
Miss - 1556 , 1620 , 2797
Mr. - 357 , 518 , 1396 , 1879 , 1977 , 2024 , 2066 , 2404
Mrs. - 1430 , 2325 , 2412 , 2711
Ms. - 232 , 604 , 735 , 811 , 983 , 1028 , 1170 , 1177 , 1244 , 1292 , 1319 , 1321 , 1543 , 1548 , 1606 ,

1759 , 1824 , 1852 , 2162 , 2185 , 2235 , 2329 , 2481 , 2619 , 2634 , 2788 , 2901 , 2970

N/A - 985

National Parks Conservation Assn. - 1094

National Parks Conservation Association - 3040

North County Humane Society - 2472

Occidental College - 1302

Ocean Outfall Group - 2703

P - 2292

PCUSA - 2076

PETA - 1803

PETA, Mercy for Animals, Animal Angels - 1597

Peace to All Beings and Circle of Compassion Association - 1952

Point Reyes Seashore Ranchers Association - 3076

Private Tax Paying Citizen - 1345

R & J McClelland Dairy - 3082 , 3086

San Diego House Rabbit Society - 1112

Save Our Seashore - 2998

Sonoma State University - 3074

Sra. - 2567

The Wildlife Trust - 938

Tule Elk foundation - 1015

United States Citizen - 1993

University of California Cooperative Extension - 3022

Western United Dairymen - 2995 , 3091

Willamette Student Chapter - National Lawyers Guild - 1400

Wolfwatcher - 1790

Young/Sommer LLC - 2667

american taxpayer! - 2588

bajacorp - 2025

citizen of the world - 1958

former Parks and Open Space Commissioner - 17

generals tax-paying public - 1581

in defense of animals - 556

member - 2438

none - 2939

none, interested citizen - 40

private citizen - 2690

self - 599 , 939

the Wildlife Trust - 1038

N/A - 4 , 9 , 10 , 11 , 23 , 28 , 30 , 36 , 44 , 47 , 112 , 119 , 148 , 154 , 174 , 175 , 178 , 230 , 256 , 275 , 286 , 297 , 316 , 352 , 354 , 428 , 445 , 457 , 474 , 488 , 501 , 502 , 509 , 519 , 550 , 566 , 589 , 593 , 594 , 596 , 612 , 613 , 628 , 636 , 647 , 648 , 660 , 662 , 678 , 685 , 702 , 737 , 738 , 739 , 771 , 777 , 778 , 780 , 781 , 787 , 788 , 794 , 803 , 804 , 814 , 824 , 825 , 830 , 843 , 845 , 847 , 863 , 892 , 935 , 942 , 955 , 964 , 972 , 980 , 981 , 991 , 1001 , 1003 , 1004 , 1007 , 1010 , 1011 , 1014 , 1018 , 1019 , 1023 , 1026 , 1027 , 1032 , 1034 , 1036 , 1046 , 1048 , 1056 , 1057 , 1060 , 1061 , 1062 , 1064 , 1065 , 1081 , 1088 , 1090 , 1092 , 1100 , 1102 , 1104 , 1108 , 1114 , 1115 , 1117 , 1125 , 1143 , 1147 , 1155 , 1157 , 1162 , 1171 , 1172 , 1179 , 1182 , 1187 , 1192 , 1199 , 1200 , 1206 , 1207 , 1215 , 1220 , 1221 , 1223 , 1225 , 1227 , 1228 , 1230 , 1233 , 1253 , 1256 , 1261 , 1264 , 1267 , 1278 , 1293 , 1297 , 1308 , 1316 , 1325 , 1331 , 1335 ,

1348 , 1349 , 1352 , 1354 , 1356 , 1359 , 1361 , 1366 , 1368 , 1371 , 1373 , 1375 , 1379 , 1382 , 1389 ,
1391 , 1393 , 1395 , 1402 , 1413 , 1414 , 1415 , 1419 , 1420 , 1424 , 1429 , 1431 , 1432 , 1437 , 1441 ,
1445 , 1449 , 1450 , 1455 , 1466 , 1470 , 1472 , 1478 , 1480 , 1481 , 1494 , 1495 , 1499 , 1500 , 1502 ,
1503 , 1505 , 1506 , 1509 , 1515 , 1516 , 1518 , 1523 , 1524 , 1531 , 1532 , 1537 , 1539 , 1547 , 1550 ,
1563 , 1564 , 1565 , 1572 , 1579 , 1580 , 1584 , 1585 , 1589 , 1592 , 1593 , 1594 , 1599 , 1600 , 1613 ,
1615 , 1622 , 1627 , 1629 , 1632 , 1634 , 1639 , 1643 , 1645 , 1654 , 1661 , 1665 , 1671 , 1673 , 1675 ,
1677 , 1678 , 1679 , 1686 , 1687 , 1688 , 1692 , 1693 , 1697 , 1698 , 1701 , 1702 , 1707 , 1712 , 1713 ,
1714 , 1716 , 1720 , 1723 , 1724 , 1729 , 1731 , 1732 , 1736 , 1737 , 1740 , 1742 , 1750 , 1753 , 1758 ,
1760 , 1763 , 1765 , 1769 , 1773 , 1776 , 1777 , 1793 , 1799 , 1815 , 1820 , 1823 , 1832 , 1836 , 1837 ,
1843 , 1846 , 1848 , 1851 , 1855 , 1857 , 1858 , 1859 , 1865 , 1868 , 1869 , 1870 , 1871 , 1875 , 1878 ,
1880 , 1881 , 1884 , 1886 , 1888 , 1889 , 1891 , 1892 , 1897 , 1899 , 1904 , 1906 , 1908 , 1909 , 1911 ,
1915 , 1918 , 1922 , 1935 , 1939 , 1941 , 1943 , 1944 , 1950 , 1951 , 1953 , 1955 , 1956 , 1960 , 1961 ,
1962 , 1963 , 1971 , 1972 , 1976 , 1982 , 1985 , 1988 , 1990 , 1992 , 1996 , 2001 , 2006 , 2007 , 2008 ,
2010 , 2011 , 2012 , 2013 , 2014 , 2015 , 2018 , 2020 , 2021 , 2022 , 2023 , 2027 , 2028 , 2031 , 2032 ,
2033 , 2034 , 2035 , 2036 , 2037 , 2038 , 2041 , 2042 , 2045 , 2051 , 2053 , 2058 , 2059 , 2067 , 2068 ,
2070 , 2071 , 2074 , 2075 , 2077 , 2079 , 2080 , 2081 , 2082 , 2084 , 2088 , 2091 , 2097 , 2102 , 2107 ,
2111 , 2113 , 2114 , 2116 , 2119 , 2120 , 2124 , 2125 , 2126 , 2130 , 2132 , 2133 , 2135 , 2136 , 2140 ,
2143 , 2146 , 2147 , 2149 , 2150 , 2155 , 2159 , 2160 , 2172 , 2173 , 2175 , 2176 , 2178 , 2179 , 2180 ,
2182 , 2183 , 2184 , 2186 , 2190 , 2193 , 2199 , 2200 , 2202 , 2205 , 2208 , 2212 , 2215 , 2225 , 2229 ,
2230 , 2232 , 2234 , 2238 , 2243 , 2245 , 2249 , 2255 , 2257 , 2263 , 2266 , 2267 , 2270 , 2273 , 2274 ,
2278 , 2282 , 2284 , 2286 , 2288 , 2289 , 2314 , 2331 , 2338 , 2340 , 2341 , 2343 , 2344 , 2345 , 2346 ,
2349 , 2353 , 2355 , 2364 , 2366 , 2368 , 2369 , 2371 , 2376 , 2387 , 2388 , 2390 , 2407 , 2410 , 2411 ,
2415 , 2420 , 2428 , 2429 , 2432 , 2446 , 2454 , 2456 , 2470 , 2480 , 2486 , 2487 , 2489 , 2490 , 2491 ,
2497 , 2503 , 2510 , 2514 , 2516 , 2519 , 2522 , 2531 , 2535 , 2543 , 2545 , 2546 , 2547 , 2558 , 2568 ,
2570 , 2572 , 2579 , 2582 , 2589 , 2608 , 2612 , 2613 , 2620 , 2626 , 2631 , 2638 , 2640 , 2646 , 2653 ,
2654 , 2659 , 2672 , 2676 , 2683 , 2684 , 2687 , 2691 , 2696 , 2705 , 2707 , 2709 , 2716 , 2724 , 2730 ,
2739 , 2742 , 2747 , 2748 , 2750 , 2754 , 2755 , 2757 , 2760 , 2764 , 2770 , 2773 , 2774 , 2775 , 2778 ,
2779 , 2781 , 2787 , 2789 , 2803 , 2816 , 2818 , 2819 , 2821 , 2825 , 2826 , 2831 , 2835 , 2843 , 2844 ,
2846 , 2848 , 2852 , 2854 , 2856 , 2858 , 2859 , 2866 , 2870 , 2876 , 2877 , 2878 , 2882 , 2887 , 2902 ,
2904 , 2906 , 2908 , 2909 , 2910 , 2914 , 2932 , 2935 , 2941 , 2949 , 2954 , 2958 , 2964 , 2965 , 2977 ,
2978 , 2981 , 2985 , 2988 , 2991 , 2999 , 3001 , 3007 , 3009 , 3010 , 3012 , 3015 , 3018 , 3025 , 3028 ,
3035 , 3038 , 3050 , 3055 , 3058 , 3059 , 3060 , 3061 , 3062 , 3063 , 3065 , 3073 , 3075 , 3087 , 3089 ,
3090 , 3093

AL150 - Alternatives: Ranch Operations, Activities, and Management

BACCHARIS INSTITUTE - 2933

California Cattlemen's Association - 3032

Center for Biological Diversity - 867

Drakes Bay Oyster Co - 3079

Environmental Action Committee of West Marin - 1140

GBT Nunes & Co - 3072

Historic B Ranch - 3071

In Defense of Animals - 1022

L Ranch - 3084

Lunny Ranch - 3083

MARINWATCH - 3036

Marin Audubon Society - 3049

Marin Conservation League - 2960

Marin County Agricultural Commissioner - 1009 , 3057
Marin County Farm Bureau - 3088
Marin Humane Society - 2986
Marin Resource Conservation District - 3085
McClelland's Dairy - 3080 , 3081
McClure Dairy, Inc - 3069
McIsaac Ranch - 3070
National Parks Conservation Association - 3040
Point Reyes Seashore Ranchers Association - 3076 , 3092
R & J McClelland Dairy - 3082 , 3086
San Francisco Bay Regional Water Quality Control Water Board - 2996
Save Our Seashore - 2998
Sonoma State University - 3074
Tule Elk foundation - 1015
U.S. Congress - 1029
UC Cooperative Extension - 2718
University of California Cooperative Extension - 3022
Western United Dairymen - 2995 , 3091
the Wildlife Trust - 1038
N/A - 1 , 12 , 13 , 15 , 26 , 28 , 30 , 31 , 34 , 43 , 44 , 46 , 792 , 886 , 965 , 1010 , 1012 , 1018 , 1026 , 1027 ,
1032 , 1041 , 1254 , 1289 , 2419 , 2775 , 2964 , 2982 , 2988 , 3005 , 3009 , 3015 , 3025 , 3031 , 3037 ,
3055 , 3058 , 3059 , 3060 , 3061 , 3065 , 3073 , 3093

AL200 - Alternatives: Elk Management

. - 2321
AFFORDABLE WORLD TRAVEL - 1975
Action For Animals - 2809
Aircon Sales and Engineering - 2811
American Citizen - 987
BACCHARIS INSTITUTE - 2933
Brown Bag Farms - 1042
CSC Anatomyarts - 1109
California Cattlemen's Association - 3032
California Certified Organic Farmers - 1043
California Native Plant Society - 3027
Center for Biological Diversity - 867
Dairywife - 25
Digity LLC - 1567
Dr. - 767 , 2252
EAC - 33
GBT Nunes & Co - 3072
Health Markets Agency - 24
Historic B Ranch - 3071
Home - 1120
IDA - 1540 , 2029
IDA member - 2564
In Defense of Animals - 1022 , 2753 , 3064
In Defense of Animals supporters - 625

L Ranch - 3084
 MALT - 2701
 Marin Audubon Society - 3049
 Marin Conservation League - 2960
 Marin County Agricultural Commissioner - 1009 , 3057
 Marin County Farm Bureau - 3088
 Marin Humane Society - 2986
 Marin Resource Conservation District - 3085
 McClelland's Dairy - 3080 , 3081
 McClure Dairy, Inc - 3069
 Member - In Defense of Animals - 2581
 Mr. - 518 , 1612 , 1977 , 2201 , 2299 , 2611 , 2763 , 2976
 Mrs. - 302 , 1422 , 1490 , 1778 , 2177 , 2265 , 2401 , 2711
 Ms. - 604 , 735 , 811 , 1028 , 1135 , 1178 , 1319 , 1630 , 1762 , 1934 , 2329 , 2348
 NA - 1237
 National Park Service - 1628
 National Parks Conservation Association - 3040
 Point Reyes Seashore Ranchers Association - 3092
 R & J McClelland Dairy - 3082 , 3086
 San Diego House Rabbit Society - 1112
 Save Our Seashore - 2998
 Society for abandoned animals. - 1609
 Sonoma State University - 3074
 Tata Motors - 2165
 The Humane Society of the United States - 2936
 The Wildlife Trust - 938
 Tule Elk foundation - 1015
 U.S. Congress - 1029
 UC Cooperative Extension - 2718
 University of California Cooperative Extension - 3022 , 3023
 W.M. Community Services; W.M. Chamber of Commerce; Pt. Reyes Vellage Assn. - 38
 West Marin Chamber of Commerce - 2963
 Western United Dairymen - 2995 , 3091
 WildCare - 3003
 WildlifeRescue League - 1641
 all-creatures.org - 2605
 former Parks and Open Space Commissioner - 17
 in defense of animals - 556
 none - 2837
 none - 1462
 none, interested citizen - 40
 psychotherapist - 1590
 self - 599 , 939 , 1123
 sfbaywildlife.info - 19
 the Wildlife Trust - 1038
 tomales bay association - 27
 N/A - 3 , 5 , 6 , 8 , 9 , 10 , 11 , 16 , 18 , 22 , 28 , 30 , 32 , 34 , 35 , 36 , 39 , 42 , 43 , 44 , 47 , 275 , 445 , 501 ,
 502 , 509 , 519 , 550 , 566 , 593 , 596 , 605 , 613 , 636 , 648 , 660 , 662 , 678 , 702 , 737 , 738 , 739 , 763 ,

771, 778, 780, 781, 794, 814, 824, 830, 847, 892, 915, 937, 964, 965, 972, 980, 1001, 1004, 1007, 1008, 1010, 1014, 1018, 1026, 1027, 1031, 1035, 1037, 1039, 1041, 1044, 1046, 1052, 1056, 1060, 1064, 1065, 1075, 1077, 1081, 1090, 1113, 1124, 1129, 1130, 1144, 1149, 1155, 1164, 1165, 1166, 1172, 1193, 1195, 1209, 1213, 1217, 1221, 1226, 1238, 1254, 1257, 1262, 1263, 1282, 1294, 1295, 1313, 1314, 1316, 1338, 1339, 1351, 1355, 1358, 1360, 1380, 1382, 1394, 1399, 1406, 1409, 1411, 1413, 1426, 1437, 1441, 1442, 1444, 1448, 1455, 1463, 1466, 1472, 1474, 1482, 1499, 1503, 1504, 1513, 1522, 1525, 1530, 1534, 1535, 1550, 1560, 1566, 1577, 1593, 1614, 1623, 1625, 1626, 1650, 1670, 1679, 1681, 1696, 1697, 1706, 1711, 1728, 1743, 1757, 1784, 1786, 1797, 1807, 1825, 1838, 1854, 1861, 1866, 1885, 1900, 1901, 1923, 1927, 1930, 1931, 1971, 1985, 2001, 2003, 2004, 2009, 2016, 2020, 2026, 2043, 2045, 2054, 2078, 2085, 2088, 2100, 2106, 2117, 2118, 2123, 2129, 2137, 2139, 2152, 2158, 2166, 2167, 2190, 2204, 2206, 2224, 2226, 2227, 2232, 2239, 2245, 2249, 2271, 2275, 2286, 2297, 2300, 2328, 2336, 2343, 2360, 2363, 2378, 2380, 2388, 2398, 2403, 2408, 2411, 2419, 2421, 2423, 2440, 2457, 2458, 2462, 2466, 2473, 2478, 2492, 2513, 2516, 2519, 2534, 2540, 2543, 2544, 2560, 2571, 2576, 2577, 2579, 2587, 2590, 2595, 2615, 2623, 2625, 2630, 2632, 2644, 2645, 2652, 2657, 2658, 2660, 2662, 2668, 2677, 2687, 2692, 2694, 2698, 2704, 2714, 2715, 2725, 2729, 2737, 2738, 2758, 2759, 2765, 2773, 2774, 2775, 2778, 2781, 2786, 2816, 2817, 2819, 2831, 2838, 2846, 2847, 2861, 2876, 2884, 2921, 2930, 2931, 2934, 2941, 2953, 2955, 2957, 2961, 2971, 2977, 2981, 2984, 2988, 2989, 2997, 2999, 3005, 3009, 3014, 3015, 3017, 3020, 3025, 3031, 3055, 3056, 3058, 3059, 3060, 3062, 3063, 3065, 3075, 3089, 3093

AL300 - Alternatives: Other/New Alternatives or Elements

BACCHARIS INSTITUTE - 2933

Concerned Students of the Wildlife Technician Program of De Anza College - 3052

Environmental Action Committee of West Marin - 1140

Historic B Ranch - 3071

In Defense of Animals - 1022, 3064

International Mountain Bicycling Association - 3033

Marin Audubon Society - 3049

Marin Conservation League - 2960

Marin County Agricultural Commissioner - 3057

Marin County Bicycle Coalition - 3000

Marin Resource Conservation District - 3085

National Parks Conservation Association - 3040

Point Reyes Seashore Ranchers Association - 3076, 3092

R & J McClelland Dairy - 3082

Save Our Seashore - 2998

The Wildlife Trust - 938

Tule Elk foundation - 1015

Turtle Island Restoration Network - 2993

U.S. Congress - 1029

Western Watersheds Project - 1055

ocean riders - 7

the Wildlife Trust - 1038

N/A - 9, 12, 14, 28, 29, 30, 829, 965, 1001, 1027, 1032, 1081, 1200, 1254, 1423, 1697, 2419, 2685, 2775, 2851, 2982, 2988, 3005, 3009, 3055, 3058, 3060, 3089, 3093

CC1000 - Consultation and Coordination: General Comments

In Defense of Animals - 1022 , 3064
Marin County Agricultural Commissioner - 1009 , 3057
Marin Humane Society - 2986
McClure Dairy, Inc - 3069
Mclsaac Ranch - 3070
Point Reyes Seashore Ranchers Association - 3076
Sonoma State University - 3074
Tule Elk foundation - 1015
U.S. Congress - 1029
UC Cooperative Extension - 2718
West Marin Chamber of Commerce - 2963
Western United Dairymen - 2995 , 3091
Western Watersheds Project - 1055
N/A - 16 , 28 , 29 , 30 , 34 , 965 , 972 , 990 , 2775 , 2981 , 2988 , 3015 , 3025 , 3059 , 3060 , 3061 , 3065 ,
3075 , 3089

DC1000 - Duplicate Comment: Duplicate of Existing Comment

N/A - 1058 , 1665 , 1667 , 3060

IS1000 - Issues: Environmental Baseline Conditions

Environmental Action Committee of West Marin - 1140
In Defense of Animals - 1022 , 3064
MARINWATCH - 3036
Marin Audubon Society - 3049
Marin Conservation League - 2960
Mclsaac Ranch - 3070
National Parks Conservation Association - 3040
Point Reyes Seashore Ranchers Association - 3076
Save Our Seashore - 2998
Western Watersheds Project - 1055
N/A - 964 , 1032

IS1100 - Issues: Ranch Operations, Activities, and Management (past, present, and future)

Brown Bag Farms - 1042
California Certified Organic Farmers - 1043
Environmental Action Committee of West Marin - 1140
Health Markets Agency - 24
Lunny Ranch - 3083
MALT - 2701
Marin Agricultural Land Trust - 3068
Marin Conservation League - 2960
Marin County Agricultural Commissioner - 3057
Mr. - 2213
Ms. - 1319
National Parks Conservation Association - 3040
Point Reyes Seashore Ranchers Association - 3076
Sierra Organics - 2918
Sonoma Marin Veterinary Service - 3048

Sonoma State University - 3074

Tule Elk foundation - 1015

U.S. Congress - 1029

UC Cooperative Extension - 2718

N/A - 36 , 39 , 482 , 509 , 525 , 685 , 1032 , 1167 , 1287 , 1464 , 1697 , 1853 , 2125 , 2411 , 2482 , 2641 , 2699 , 2775 , 2786 , 2931 , 3009 , 3063 , 3065 , 3075 , 3089

IS1150 - Issues: Agriculture and Agriculture Leases (past, present, and future)

Nature Conservancy - 1347

In Defense of Animals - 3064

Ms. - 2258 , 2788

Point Reyes Seashore Ranchers Association - 3092

Sonoma State University - 3074

Tamara Palmer - 1059

University of California Cooperative Extension - 3022

We the people - 2285

n/a - 1122

N/A - 30 , 45 , 1032 , 1117 , 1187 , 1191 , 1283 , 1310 , 1325 , 1459 , 1909 , 2020 , 2049 , 2097 , 2156 , 2326 , 2342 , 2371 , 2406 , 2441 , 2484 , 2487 , 2512 , 2527 , 2568 , 2570 , 2595 , 2607 , 2620 , 2626 , 2659 , 2689 , 2719 , 2755 , 2831 , 2855

IS1200 - Issues: Cultural Resource Management (past, present, and future)

Alliancce for Local Sustainable Agriculture - 3077

Lunny Ranch - 3083

Marin Conservation League - 2960

Point Reyes Seashore Ranchers Association - 3076

R & J McClelland Dairy - 3086

Sonoma State University - 3074

University of California Cooperative Extension - 3022

N/A - 965 , 972 , 1697 , 2775 , 2981 , 3060

IS1300 - Issues: Natural Resource Management (past, present, and future)

Andean Tapir Fund - 1138

Environmental Action Committee of West Marin - 1140

Marin Audubon Society - 3049

Mrs. - 617 , 1312

National Parks Conservation Association - 3040

University of California Cooperative Extension - 3022

former Parks and Open Space Commissioner - 17

neo - 2723

N/A - 23 , 28 , 386 , 972 , 984 , 1331 , 1496 , 1610 , 2373 , 2616 , 2982 , 2988 , 3038 , 3045 , 3060

IS1400 - Issues: Tule Elk Management on Ranchlands (past, present, and future)

American Institute of Architects - 3019

Aqua Tek LLC - 2439

Brocco Show Cattle - 2418

California Certified Organic Farmers - 1043

Center for Biological Diversity - 867

Concerned Students of the Wildlife Technician Program of De Anza College - 3052
Dairywife - 25
De Anza College Environmental Studies Department Student - 20
Dr. - 767
EAC - 33
Environmental Action Committee of West Marin - 1140
Health Markets Agency - 24
In Defense of Animals - 1022 , 3064
Miss - 1620
Ms. - 604 , 735 , 811 , 1759 , 2671
Point Reyes Seashore Ranchers Association - 3076 , 3092
San Diego House Rabbit Society - 1112
Sonoma State University - 3074
Tule Elk foundation - 1015
U.S. Congress - 1029
University of California Cooperative Extension - 3022
former Parks and Open Space Commissioner - 17
in defense of animals - 556
none, interested citizen - 40
rocky mountain elk foundation - 1451
self - 599
the Wildlife Trust - 1038
tomales bay association - 27
N/A - 3 , 21 , 23 , 28 , 42 , 44 , 47 , 175 , 185 , 339 , 501 , 502 , 509 , 550 , 566 , 593 , 596 , 613 , 636 , 660 ,
662 , 678 , 737 , 738 , 739 , 771 , 778 , 780 , 781 , 794 , 830 , 847 , 859 , 892 , 964 , 1005 , 1010 , 1012 ,
1032 , 1039 , 1061 , 1108 , 1190 , 1191 , 1230 , 1324 , 1340 , 1374 , 1417 , 1420 , 1436 , 1440 , 1505 ,
1589 , 1598 , 1599 , 1600 , 1602 , 1607 , 1659 , 1692 , 1693 , 1702 , 1979 , 2020 , 2049 , 2089 , 2145 ,
2210 , 2307 , 2357 , 2361 , 2471 , 2475 , 2485 , 2517 , 2584 , 2647 , 2855 , 2862 , 2874 , 2959 , 2982 ,
3009 , 3030 , 3061

IT1000 - Impact Topic: Geological Resources (erosion, stream incision, streambanks/streambeds, quarries)

Western Watersheds Project - 1055
N/A - 185 , 792 , 964 , 965 , 1010

IT1100 - Impact Topic: Water Quality and Quantity

Center for Biological Diversity - 867
Concerned Students of the Wildlife Technician Program of De Anza College - 3052
EAC - 33
San Francisco Bay Regional Water Quality Control Water Board - 2996
Western Watersheds Project - 1055
N/A - 28 , 792 , 964 , 1008

IT1200 - Impact Topic: Floodplains, Wetlands, Riparian Areas

Center for Biological Diversity - 867
Marin Audubon Society - 3049
Point Reyes Seashore Ranchers Association - 3092
San Francisco Bay Regional Water Quality Control Water Board - 2996

Western Watersheds Project - 1055
N/A - 1032

IT1300 - Impact Topic: Species of Special Concern (plant or animal; federally listed or proposed for listing or their habitat; state listed)

Andean Tapir Fund - 58
Center for Biological Diversity - 867
Marin Audubon Society - 3049
Point Reyes Seashore Ranchers Association - 3092
The Wildlife Trust - 938
University of California Cooperative Extension - 3022
Western Watersheds Project - 1055
the Wildlife Trust - 1038
N/A - 964 , 1010 , 1032 , 3045

IT1400 - Impact Topic: Fish and Wildlife and Associated Habitat (including non-native wildlife and fish species; not including tule elk)

Andean Tapir Fund - 58
Center for Biological Diversity - 867
Environmental Action Committee of West Marin - 1140
Marin Audubon Society - 3049
Ms. - 2316
Tule Elk foundation - 1015
earthheart wellness - 2048
hansardrobert - 1412
the Wildlife Trust - 1038
www.eatonvilleneews.net - 1249
N/A - 381 , 525 , 578 , 703 , 908 , 930 , 964 , 1013 , 1016 , 1019 , 1036 , 1040 , 1080 , 1083 , 1192 , 1232 , 1239 , 1285 , 1334 , 1469 , 1826 , 1939 , 2437 , 2554 , 3046

IT1500 - Impact Topic: Tule Elk (not relating to management)

Center for Biological Diversity - 867
In Defense of Animals - 3064
Marin Audubon Society - 3049
Marin Conservation League - 2960
The Wildlife Trust - 938
self - 3047
N/A - 28 , 30 , 42

IT1600 - Impact Topic: Vegetation (including dunes and non-native plant species)

Andean Tapir Fund - 58
Brown Bag Farms - 1042
Environmental Action Committee of West Marin - 1140
Marin Audubon Society - 3049
Marin Conservation League - 2960
National Parks Conservation Association - 3040
Point Reyes Seashore Ranchers Association - 3092
University of California Cooperative Extension - 3022

Western Watersheds Project - 1055
the Wildlife Trust - 1038
N/A - 28 , 964 , 1010 , 1032 , 3073

IT1800 - Impact Topic: Greenhouse Gas Emissions and Climate Change

Western Watersheds Project - 1055
N/A - 28 , 36 , 792 , 964 , 1036 , 2978

IT1900 - Impact Topic: Visual/Aesthetic Resources

N/A - 1002 , 1909 , 1939

IT2000 - Impact Topic: Cultural Resources including Historic Ranching Districts, Cultural Landscapes, and Prehistoric/Historic Structures

Brown Bag Farms - 1042
In Defense of Animals - 3064
Lunny Ranch - 3083
U.S. Congress - 1029
Western Watersheds Project - 1055
N/A - 28 , 964 , 1014 , 1035 , 1225 , 1697 , 3060

IT2100 - Impact Topic: Ranch Complexes (not relating to management)

Lunny Ranch - 3083
N/A - 30 , 1032

IT2200 - Impact Topic: Socioeconomic Resources

BACCHARIS INSTITUTE - 2933
MALT - 2701
R & J McClelland Dairy - 3082
Sonoma State University - 3074
N/A - 964 , 1018 , 1697

IT2300 - Impact Topic: Visitor Use, Experience, and Recreation

In Defense of Animals - 1022 , 3064
Marin Audubon Society - 3049
Marin Humane Society - 2986
Point Reyes Seashore Ranchers Association - 3092
R & J McClelland Dairy - 3082
The Humane Society of the United States - 2936
Tule Elk foundation - 1015
N/A - 964 , 1002 , 1032 , 1939 , 1959 , 3050 , 3055

IT2400 - Impact Topic: Health and Safety

Point Reyes Seashore Ranchers Association - 3092

IT2500 - Impact Topic: Wilderness

Brown Bag Farms - 1042
Environmental Action Committee of West Marin - 1140
National Parks Conservation Association - 3040

Western Watersheds Project - 1055
N/A - 1014 , 3062

IT2600 - Impact Topic: Park Operations

Marin Audubon Society - 3049
N/A - 964

IT2700 - Impact Topic: Other/New Impact Topics

Marin Humane Society - 2986
Point Reyes Seashore Ranchers Association - 3076
Tule Elk foundation - 1015
University of California Cooperative Extension - 3022
Western Watersheds Project - 1055
N/A - 30 , 3060

MT1000 - Miscellaneous Topics: General Comments

Spirit Acres Farm - 1529
A - 1684
California Native Plant Society - 3027
Center for Biological Diversity - 867
Doorish Ophthalmic Technologies - 1685
Dr. - 767 , 963
Drakes Bay Oyster Co - 3079
Environmental Action Committee of West Marin - 1140
IDA - 2422
In Defense Of Animals - 2389
Landscape Architect, Planner - 2
Marin County Agricultural Commissioner - 1009
Me myself I - 1103
Mme - 341
Mr. - 84 , 2250 , 2498 , 2968 , 3044
Mrs. - 1006 , 1063 , 1446 , 1653 , 1766 , 1928 , 2351 , 2599
Ms. - 931 , 982 , 1111 , 1133 , 1730 , 1834 , 1895 , 2103 , 2294
N/A - 1427
None - 1967 , 2335 , 2507
Retired Real Estate Broker - 2128
The Friends of Broward Homeless - 1110
Unifor Local 199 - 1942
West Marin Chamber of Commerce - 2963
Western Watersheds Project - 1055 , 1066
Zanardi Ranch - 3043
consultant - 2460
league for the Defense of animals - 2161
member - 2433
taxpayer - 2464
the Wildlife Trust - 1038
university of mumbai - 2808
www.just-do-something.org - 2839

N/A - 287 , 387 , 448 , 451 , 525 , 553 , 564 , 570 , 589 , 612 , 647 , 648 , 655 , 683 , 685 , 708 , 778 , 787 , 788 , 801 , 802 , 805 , 818 , 828 , 833 , 855 , 872 , 915 , 958 , 965 , 979 , 994 , 1014 , 1024 , 1030 , 1045 , 1084 , 1105 , 1126 , 1132 , 1134 , 1159 , 1189 , 1219 , 1252 , 1255 , 1265 , 1286 , 1305 , 1332 , 1341 , 1357 , 1383 , 1443 , 1501 , 1514 , 1527 , 1576 , 1583 , 1587 , 1605 , 1619 , 1638 , 1642 , 1666 , 1674 , 1710 , 1718 , 1745 , 1772 , 1775 , 1794 , 1800 , 1804 , 1814 , 1835 , 1840 , 1863 , 1890 , 1894 , 1937 , 1940 , 1947 , 1948 , 1973 , 2002 , 2005 , 2019 , 2044 , 2062 , 2121 , 2151 , 2154 , 2181 , 2194 , 2209 , 2220 , 2222 , 2223 , 2237 , 2253 , 2254 , 2259 , 2262 , 2280 , 2287 , 2293 , 2298 , 2301 , 2306 , 2309 , 2313 , 2354 , 2359 , 2362 , 2374 , 2391 , 2393 , 2419 , 2430 , 2451 , 2499 , 2500 , 2511 , 2529 , 2533 , 2536 , 2539 , 2555 , 2561 , 2578 , 2586 , 2592 , 2614 , 2670 , 2708 , 2768 , 2786 , 2790 , 2794 , 2812 , 2813 , 2814 , 2815 , 2822 , 2830 , 2845 , 2857 , 2865 , 2883 , 2888 , 2922 , 2927 , 2942 , 2946 , 2969 , 2981

ON1000 - Other NEPA Issues: General Comments

California Cattlemen's Association - 3032
Point Reyes Seashore Ranchers Association - 3076
Sonoma State University - 3074
State of California, Governor's Office of Planning and Research - 1000
The Wildlife Trust - 938
Western Watersheds Project - 1055
the Wildlife Trust - 1038
N/A - 3063

PN1000 - Purpose And Need: Planning Process And Policy

Center for Biological Diversity - 867
Sonoma State University - 3074
The Wildlife Trust - 938
Tule Elk foundation - 1015
the Wildlife Trust - 1038
N/A - 28 , 34 , 37 , 3055 , 3061

PN2000 - Purpose And Need: Park Purpose And Significance

Center for Biological Diversity - 867
Dr. - 767
In Defense of Animals - 1022 , 3064
In Defense of Animals supporters - 625
Marin County Agricultural Commissioner - 1009 , 3057
Mr. - 518
Mrs. - 1538
Ms. - 604 , 735 , 811
Point Reyes Seashore Ranchers Association - 3076
The Wildlife Trust - 938
in defense of animals - 556
self - 599
the Wildlife Trust - 1038
N/A - 44 , 47 , 501 , 502 , 509 , 550 , 566 , 593 , 594 , 596 , 613 , 636 , 662 , 678 , 685 , 702 , 737 , 738 , 739 , 771 , 778 , 780 , 781 , 794 , 830 , 847 , 892 , 964 , 1002 , 1010 , 1032 , 1271 , 1410 , 1515 , 1549 , 1580 , 1917 , 1939 , 1955 , 2279 , 2775 , 2988 , 3060

PN7100 - Purpose and Need: Purpose and Need for Taking Action

In Defense of Animals - 3064

Point Reyes Seashore Ranchers Association - 3076

Sonoma State University - 3074

Western Watersheds Project - 1055

N/A - 964 , 1697 , 2988 , 3060

PN8000 - Purpose And Need: Objectives In Taking Action

Marin County Agricultural Commissioner - 1009

Point Reyes Seashore Ranchers Association - 3076

San Francisco Bay Regional Water Quality Control Water Board - 2996

Tule Elk foundation - 1015

Western Watersheds Project - 1055

N/A - 30 , 1018 , 1697 , 2982

PO1000 - Park Operations: Guiding Policies, Regs And Laws

Concerned Students of the Wildlife Technician Program of De Anza College - 3052

N/A - 28

RF1000 - References: Suggested References

MARINWATCH - 3036

Tule Elk foundation - 1015

University of California Cooperative Extension - 3022

N/A - 1010 , 2988

APPENDIX C: PUBLIC SCOPING MEETING HANDOUTS



You Are Invited To Participate

The National Park Service (NPS) is beginning the preparation of a Ranch Comprehensive Management Plan/ Environmental Assessment (Ranch CMP) in accordance with the National Environmental Policy Act (NEPA). Public scoping is the first step to involve the public in the NEPA process. Scoping includes holding meetings, providing information, and asking the public for their comments so that their concerns are identified early and the analysis is focused on important issues. The NPS encourages comments on the draft purpose and need, and requests that the public identify topics and concerns that should be addressed in the Ranch CMP. Commenters are also encouraged to bring forward any new information the NPS may not be aware of that would be of use in preparing the Ranch CMP.

Background

In his November 29, 2012 memorandum, the Secretary of the Interior observed that ranching operations “have a long and important history on the Point Reyes peninsula” and directed the NPS director “to pursue extending permits for the ranchers within those pastoral lands to 20-year terms.”

- Broad planning with regard to management of lands under agricultural lease/permits has not been conducted since the 1980 General Management Plan. A comprehensive planning and compliance process is needed to evaluate reasonably foreseeable dairy and range management practices as well as park management actions on these lands over the next 20 years.
- The NEPA process will evaluate potential activities that may be authorized through the lease/permit program to ensure they are consistent with the protection of park resources. The plan will also consider park management actions that address wildlife, vegetation, and other resource issues specific to lands operated under agricultural leases/permits.
- Ranchers and the public have raised concerns related to tule elk and their impact on current ranch operations. Management strategies included in the Ranch CMP would augment tule elk management actions in other parts of the park not addressed in the 1998 Tule Elk Management Plan/EA.
- The planning process involves more than 28,000 acres of land and 24 ranching families. Each of these operations is unique and collectively represents a wide range of approaches, from traditional commodity production to organic and niche production.



Photo Credit: Bruce Farnsworth

Purpose and Need for Action

WHAT IS THE PURPOSE?

The purpose of this plan is to establish a comprehensive framework for the management of existing ranch lands administered by Point Reyes National Seashore under agricultural lease/special use permits (lease/permits), with terms up to 20 years.

WHAT IS THE NEED?

Ranching has a long and important history on the Point Reyes peninsula and adjacent National Park Service lands. These working ranches are a vibrant part of Point Reyes National Seashore and represent an important contribution to the superlative natural and cultural resources of these NPS lands. Protection of these diverse and unique resources is an important responsibility shared by the NPS and park ranchers within the agricultural lease/permit areas. On November 29, 2012, the Secretary of the Interior issued a memorandum authorizing the NPS to pursue long-term lease/permits for dairy and beef ranching operations. The Secretary's memorandum demonstrates the support of the NPS and the Department of the Interior for the continued presence of dairy and beef ranching operations within these NPS lands.

A comprehensive management plan is needed:

- To articulate a clear vision for ranching on existing ranch lands administered by Point Reyes National Seashore.
- To implement the Secretary of the Interior's direction to pursue issuance of lease/permits with terms up to 20 years.
- To address concerns related to tule elk impacts to existing ranch operations.
- To provide clear guidance and streamline processes for park and regulatory review of proposed ranching activities, including best management practices that promote protection of park resources.



Plan Objectives

Objectives are what must be achieved to a large degree for the action to be considered a success. All of the alternatives selected for detailed analysis must meet the project objectives to a large degree and resolve the purpose of and need for action.

Consistent with NPS policies, the protection of park resources and the Secretary's Memorandum of November 29, 2012, the objectives of this planning process are to:

RANGE MANAGEMENT AND OPERATIONS

- Clarify NPS expectations and rancher commitments to ensure consistency of agricultural lease/permits;
- Identify and evaluate activities that provide operational flexibility to support long-term dairy and beef cattle operations in a manner consistent with the protection of park resources;
- Define best management practices to promote protection of park resources and streamline park and regulatory review and approvals of proposed ranching activities;
- Promote the health and safety of agricultural workers on ranch lands;
- Define a process for maintaining ranching if a ranch operator chooses not to continue operations;
- Support sustainable operational practices such as maintaining organic certification, promoting increased energy efficiency, and working towards carbon neutral operations; and
- Review and update permit structure to reflect decisions made through this plan.

VISITOR EXPERIENCE

- Coordinate and promote interpretation and education opportunities for visitors and the public to learn about historic and contemporary ranching operations; and
- Address visitor access and recreational opportunities on ranch lands to protect the interests of park and ranch facilities, while ensuring protection of ranch operations and their privacy.

NATURAL AND CULTURAL RESOURCE MANAGEMENT

- Establish long-term management approach for tule elk affecting agricultural lease/permit areas;
- Evaluate management approaches that improve maintenance of ranch operations and protect native wildlife and vegetation populations; identify collaborative management opportunities that promote protection of sensitive and rare cultural and natural resources through adaptation of ranch management activities;
- Identify management and maintenance strategies for protecting historic ranch structures leased as part of park agricultural lease/permits and archeological sites; and
- Identify collaborative management opportunities that promote protection of Shafter era ranching Historic Districts including the Point Reyes Dairy District and the Olema Valley Historic District.



Are there other objectives the NPS should consider as part of this planning process?

Issues

An issue describes the relationship between actions and environmental (i.e., natural, cultural, and socioeconomic) resources. Issues are usually problems that either the “no action” alternative or current situation has caused or that any of the proposed alternatives might cause. They may be questions, concerns, problems, or other relationships, including beneficial ones.

Issues identified as a result of working and meeting with ranchers that the Ranch CMP would consider include:

RANCH OPERATIONS/ACTIVITIES

- Review of permit structure
- Operational flexibility
- Best management practices
- Grazing regime adaptation
- Manure management/compost opportunities
- Production of other domestic livestock
- Diversification (small scale row crop, value added operations within existing structures, etc.)
- Process for ranchers to request new activities

MANAGEMENT OF TULE ELK ON RANGLANDS

- Long-term plan to manage tule elk impacting ranch operations within Seashore managed lands
- Impacts to high value pasture and damage to fences
- Evaluate potential actions within and adjacent to active ranch operations to manage tule elk

FLOODPLAINS, WETLANDS, RIPARIAN AREAS

- Buffers for water quality protection
- Habitat enhancement

SPECIES OF SPECIAL CONCERN

- Management opportunities to promote protection of sensitive and rare plant and wildlife species

HEALTH and SAFETY

- Standards for operator and worker housing

VEGETATION

- Restoration of native prairie
- Dunes
- Non-native species management
- Brush management
- Pasture improvement/increased forage production/silage
- Fire regime

VISITOR USE/RECREATION

- Interpretive/education programs regarding historic and contemporary ranching operations
- Access
- Recreational opportunities
- Privacy protection for ranchers

PLANNING & PROTECTION OF RANCH COMPLEXES

- Define areas for ranch infrastructure improvements
- Define roles and responsibilities for maintenance of existing infrastructure

HISTORIC STRUCTURES

- Guidelines for standards for maintenance of existing historic structures
- Evaluate opportunities for development or placement of new structures in the context of cultural landscape

CULTURAL LANDSCAPES

- Protection of Shafter era ranching Historic Districts

Are there other issues or concerns that should be considered as we develop the Ranch CMP?

Tule Elk

TULE ELK BACKGROUND

- Tule elk, the smallest subspecies of North American elk, only occurs in California. Tule elk were extirpated from Point Reyes by the 1860s. Consistent with Public Law 94-389, a total of 10 tule elk were successfully reintroduced to a 2,600-acre fenced wilderness reserve on Tomales Point in 1978. This enclosed herd has grown to one of the largest in California, comprising 350 to 500 animals.
- The park's 1998 Tule Elk Management Plan/EA established the free-ranging herd with an interim management limit of 250-350 elk. The 1998 Tule Elk Management Plan/EA did not contemplate the expansion of tule elk into the pastoral lands.
- The free-ranging tule elk herd was established from 28 animals in 1999. There are two independent free-ranging herds.
- California Department of Fish and Wildlife (CDFW) manages most other tule elk herds in the state.

FREE RANGE HERD CURRENT STATUS

- D Ranch Herd – 76 total animals. The main herd is a generally cohesive group of approximately 60 elk consisting of females, juveniles, and a few males. The remaining males form one to two small bachelor groups that remain separate from the main herd except during the rut. The main herd and bachelor groups spend time on C Ranch, E Ranch, the former D Ranch, and in surrounding areas with no cattle grazing.
- Limantour Herd – 71 total animals. These elk are spread over a wide area from Coast Camp to as far north as the D. Rogers Ranch adjacent to Sir Francis Drake Boulevard. The females, juveniles, and some males remain in the wilderness area. Approximately 25-30 males spend time on ranch lands along Estero Road through the Home Ranch area. Most activity is south of Sir Francis Drake Boulevard with only 6-8 tule elk to the north at any one time. The males return to the wilderness area during the rut.

RECENT TULE ELK MANAGEMENT ACTIVITIES

- Ongoing monitoring since fall 2010
- Ongoing elk crossing and cattle fence repairs since 2011
- D Ranch water project completed in 2013
- Hazing to push main herd off of active ranch lands since 2012

UPCOMING TULE ELK MANAGEMENT ACTIVITIES

Johne's Disease Testing

- Johne's disease (paratuberculosis) is a widespread disease which can occur in most ruminants and is known to occur in the tule elk at Point Reyes. Due to concerns about disease transmission to uninfected elk herds, Johne's disease remains a concern for any alternatives considering relocation of tule elk.
- The NPS will implement a Johne's disease testing program with University of Wisconsin – Johne's Testing Center in spring/summer 2014.

Experimental Relocation within the Park

- The NPS intends to capture and relocate 3-4 younger elk from D Ranch back into the wilderness area to see what the response is by the elk. The response, such as integrate with Limantour herd or return to D Ranch, will help to inform the potential management solutions for this planning process.
- Potential relocation timeline could be after the rut in fall 2014.
- Johne's disease risk must be evaluated prior to any relocation.
- CDFW has observed that moving adults is not a viable approach because they will quickly return to their capture locations.

Tule Elk Impacts to Ranching Operations

Ranch operators have reported a number of impacts and concerns to their operations associated with tule elk including:

- Loss of forage due to direct consumption by elk
- Inability to rest pastures and allow forage to grow to maximum levels
- Damage to fences and other infrastructure
- Difficulty keeping cattle in desired pastures due to fence damage
- Concerns that organic standards may not be met due to loss of available forage to elk
- Consumption of water for livestock
- Concerns of disease transmission from elk to cattle, specifically Johne's disease

The NEPA Process

The National Environmental Policy Act (NEPA) is a legal requirement for federal agencies, but is better described as an environmental planning process. The following describes the major steps in the process.



Best Management Practices

Proposed ranching activities identified as Best Management Practices that may be considered as part of this planning process include:

- Repair and Maintenance of Primary Access Roads
- Establishment of Livestock Walkways and Feed and Water Trough Locations
- Critical Area Planting
- Filter Strip
- Fish Passage
- Grade Stabilization/Headcut Repair Structure
- Grassed Waterway
- Lined Waterway
- Pipeline
- Sediment Basin
- Spring/Well Development
- Streambank Protection
- Stream Channel Stabilization
- Stream Habitat Improvement
- Structure for Water Control
- Underground Outlet
- Water and Sediment Control Basin
- Fencing
- Pond Maintenance (de-silting ponds, maintaining berms, etc.)



Cattle Crossing/Livestock Walkway



Fencing/Stream Habitat Improvement



Water Trough

Potential Impact Topics

Potential impact topics address those resources or values that are currently affected or could be affected by proposed actions. The NPS has identified the following list of impact topics for detailed analysis in the Ranch CMP:

- Geologic Resources
- Water Quality and Quantity
- Floodplains, Wetlands, and Riparian Areas
- Vegetation
- Fish and Wildlife and Associated Habitat
- Species of Special Concern
- Visitor Experience and Recreation
- Cultural Resources including Historic Ranching Districts; Cultural Landscapes; Prehistoric/Historic Structures
- Socioeconomics
- Health and Safety
- Park Operations

How to Comment

There are several ways to submit comments on this plan/EA:

1. Via the internet through the NPS Planning, Environment and Public Comment site at: <http://parkplanning.nps.gov/pore> (preferred method)
2. In-person at the open house meetings, either recorded at the comment stations or submitted on comment sheets provided at the meeting
3. Mail or hand-deliver to park headquarters:
Point Reyes Ranch CMP/EA
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

The public comment period will close on June 2, 2014.

Below are some scoping questions you may consider as you are reviewing the draft purpose, need and objectives of the proposed project:

- What do you think the NPS should be considering as it develops this Ranch CMP?
- What are the most important issues regarding the lands under agricultural lease/permits that you believe need to be addressed in this plan?
- What are reasonably foreseeable future ranching activities that should be considered and reviewed as part of this plan?
- What are reasonably foreseeable actions related to the management of tule elk affecting park ranch operations that should be considered as part of this plan?
- What are potential park actions related to the management of cultural and natural resources on ranch lands that should be considered as part of this plan?
- What do you, as a member of the public, need from NPS to be meaningfully engaged in the planning process?

Comments will not be accepted by FAX, e-mail, or in any other way than those specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted. You should be aware that your entire comment—including personal identifying information, such as your address, phone number, and e-mail address—may be made public at any time. While you can ask in your comment that your personal identifying information be withheld from public review, the National Park Service cannot guarantee that it will be able to do so.

Point Reyes National Seashore

Plan de Manejo Comprensivo/ Evaluación Ambiental del Rancho Evaluación Ambiental

National Park Service
U.S. Department of the Interior



Usted está invitado a participar

El Servicio de Parques Nacionales (National Park Service, o NPS) está iniciando la preparación de un Plan de Manejo Comprensivo/ Evaluación Ambiental del Rancho (Ranch Comprehensive Management Plan, o CMP) de acuerdo con la Ley Nacional sobre Política Ambiental (National Environmental Policy Act, o NEPA). El alcance público es el primer paso para involucrar al público en el proceso de la ley NEPA. La determinación del alcance incluye organizar reuniones y proveer oportunidades para que el público en general pueda ofrecer sus comentarios, del tal modo que sus preocupaciones sean identificadas suficientemente temprano y el análisis se enfoque en asuntos importantes. El NPS fomenta comentarios sobre el borrador del propósito, necesidades y objetivos, y también pide que el público identifique temas y preocupaciones que deberían abordarse en el CMP del Rancho.

Antecedente

En su memorándum de 29 de noviembre de 2012, el Secretario del Interior observó que las operaciones de agricultura y ganadería “tienen una larga e importante historia en la península de Point Reyes” y dirigió al director del Servicio de Parques Nacionales (NPS) a que “buscarse extender por término de 20 años los permisos para los ganaderos dentro de aquellas tierras de pastoreo”.

- No se ha conducido una planificación de amplio alcance que considere el manejo de tierras bajo arrendamiento agrícola/permisos desde el Plan de Manejo Comprensivo de 1980. Se necesita una planificación comprensiva y proceso de cumplimiento para evaluar las prácticas de manejo, razonablemente previsibles, de las operaciones lecheras y de las pasturas, igual que para las acciones de manejo del parque de estas tierras durante los próximos 20 años.
- El proceso de la Ley Nacional sobre Política Ambiental (NEPA) evaluará las actividades potenciales que pueden ser autorizadas mediante el programa de arrendamiento agrícola/permisos para asegurar que éstas sean coherentes con la protección de los recursos del parque. El plan también considerará acciones de manejo del parque dirigidas a proteger la vida silvestre, la vegetación y otros problemas con los recursos en relación a las tierras operadas bajo arrendamiento agrícola/permisos.
- Los ganaderos y el público han expresado su preocupación en relación al ciervo de California y el impacto que éste tiene en las operaciones de rancho actuales. Las estrategias de manejo que se incluyen en el Plan de Manejo Comprensivo del Rancho (Ranch Comprehensive Management Plan, o CMP del Rancho) incrementarían las acciones de manejo del ciervo de California en otras partes del parque, las cuales no se incluyeron en el Plan de Manejo/ Evaluación Ambiental del Ciervo de California de 1998.
- El proceso de planificación involucra más de 28.000 acres de tierras y 24 familias de ganadería. Cada una de estas operaciones es única y en conjunto representa una amplia serie de estrategias que van desde la producción tradicional de productos hasta la producción orgánica y de nicho.



© Susan Van der Wal



© Bruce Farnsworth

Propósito y Necesidad de la Acción

¿Cuál es el Propósito?

El propósito de este plan es establecer un marco amplio para el manejo de tierras actuales del rancho administradas por la Costa Nacional de Point Reyes bajo un arrendamiento agrícola/permisos de uso especial (arrendamiento/permisos), con términos de hasta 20 años.

¿Cuál es la Necesidad?

La agricultura y ganadería tiene una larga e importante historia en la península de Point Reyes y en las tierras adyacentes del NPS. Estos ranchos activos son una parte dinámica de la Costa Nacional de Point Reyes y representan una importante contribución a los recursos culturales y naturales excepcionales de estas tierras del NPS. La protección de estos recursos únicos y diversos es una responsabilidad importante compartida por el NPS y los ganaderos del parque dentro de las áreas del arrendamiento agrícola/permiso de uso especial. El 29 de noviembre del 2012, el Secretario del Interior expidió un memorándum autorizando al NPS a buscar arrendamientos/permisos de uso especial de largo plazo para operaciones de agricultura y ganadería, incluyendo ganado vacuno de carne y ganado vacuno lechero. El memorándum de Secretario del Interior demuestra el apoyo del NPS y del Ministerio del Interior para la presencia continua de operaciones de agricultura y ganadería, incluyendo ganado vacuno de carne y ganado vacuno lechero, en estas tierras del NPS.



Un Plan de Manejo Comprensivo es necesario:

- Para articular una visión clara para la agricultura y ganadería en las tierras actuales del rancho administradas por la Costa Nacional de Point Reyes.
- Para implementar la orden del Secretario del Interior de buscar la expedición de arrendamientos/permisos de uso especial con términos de hasta 20 años.
- Para abordar las preocupaciones respecto al impacto del ciervo de California sobre las operaciones actuales del rancho.
- Para proporcionar una dirección clara y para hacer más eficiente los procesos para la revisión regulatoria y la revisión del parque de las actividades propuestas de agricultura y ganadería, incluyendo buenas prácticas de manejo que promuevan la protección de los recursos del parque.

Objetivos del Proyecto

Los objetivos constituyen lo que debe ser cumplido en gran medida para que la acción sea considerada un éxito. Todas las alternativas seleccionadas para el análisis detallado deben cumplir con los objetivos del proyecto en gran medida y resolver el propósito y la necesidad de la acción.

De acuerdo con las políticas del NPS y de la protección de los recursos del parque y del memorándum del Secretario del Interior del 29 de noviembre del 2012, los objetivos de este proceso de planeación son los siguientes:

Manejo y Operaciones de Pastizales

- Aclarar las expectativas del NPS y los compromisos de los ganaderos para asegurar la regularidad de los arrendamientos agrícolas/permisos de uso especial;
- Identificar y evaluar actividades que provean flexibilidad operacional para apoyar las actividades de ganadería, incluyendo ganado vacuno de carne y ganado vacuno lechero, a largo plazo de una manera coherente con la protección de los recursos del parque;
- Definir las buenas prácticas de manejo que promuevan la protección de los recursos del parque y que hagan más eficiente los procesos para la revisión regulatoria y la revisión del parque, igual que las aprobaciones, de las actividades de agricultura y ganadería propuestas;
- Promover la salud y seguridad de trabajadores agrícolas en tierras del rancho;
- Definir un proceso para el mantenimiento de las actividades de agricultura y ganadería en caso de que un operador del rancho decida no continuar con las operaciones;
- Apoyar prácticas operativas sustentables, tales como mantener la certificación orgánica, promover el incremento de la eficiencia de la energía y trabajar para lograr operaciones neutrales de carbono; y

- Revisar y actualizar la estructura de permisos de tal manera que reflejen las decisiones tomadas a través de este plan.

Experiencia de los Visitantes

- Coordinar y promover las oportunidades para la interpretación y la educación para que los visitantes y el público en general aprendan sobre las operaciones de agricultura y ganadería históricas y contemporáneas; y
- Abordar el acceso de los visitantes y las oportunidades recreativas en las tierras del rancho para proteger los intereses del parque y de las instalaciones del rancho y al mismo tiempo asegurar la protección de las operaciones del rancho y su privacidad.

Manejo de Recursos Naturales y Culturales

- Establecer una estrategia de manejo a largo plazo para el impacto del ciervo de California en las áreas bajo arrendamiento agrícola/permiso de uso especial;
- Evaluar estrategias de manejo que mejoren el mantenimiento de las operaciones del rancho y protejan la vida silvestre y la vegetación endémica; identificar las oportunidades de manejo colaborativas que promuevan la protección de los recursos naturales y culturales raros y sensibles a través de la adaptación de actividades de manejo del rancho;
- Identificar las estrategias de mantenimiento y manejo para la protección de las estructuras históricas del rancho arrendadas como parte del arrendamiento agrícola/permisos del parque y de los sitios arqueológicos; y
- Identificar las oportunidades de manejo colaborativas que promuevan la protección de los Distritos Históricos de agricultura y ganadería de la era Shafter, incluyendo el Distrito Lechero Point Reyes y el Distrito Histórico de Olema Valley.

¿Existen otros objetivos que el NPS debería considerar como parte de este proceso de planificación?

Dificultades

Una dificultad describe la relación entre las acciones y los recursos del medioambiente (por ej., natural, cultural y socioeconómico). Las dificultades representan generalmente problemas que tanto la alternativa de “ninguna acción” o situación actual han causado, así como las que cualquiera de las alternativas propuestas podrían causar. Estas pueden ser preguntas, preocupaciones, problemas u otras relaciones, incluyendo aquéllas que son beneficiosas.

Las dificultades identificadas como resultado de las reuniones con los ganaderos y otras organizaciones que el CMP del Rancho consideraría incluyen:

Operaciones/Actividades de Ganadería

- Evaluación de la estructura de permisos
- Flexibilidad operativa
- Buenas Prácticas de Manejo
- Adaptación del régimen de pastoreo
- Manejo de abonos/oportunidades para preparar compost
- Producción de otro ganado doméstico
- Diversificación (cultivos en surcos a pequeña escala, operaciones de valor agregado dentro de las estructuras existentes, etc.)
- Proceso para que los ganaderos soliciten nuevas actividades

Manejo del Ciervo de California en las Tierras de Rancho

- Plan a largo plazo para manejar el impacto del ciervo de California en las operaciones de agricultura y ganadería dentro de las áreas manejadas por la Costa Nacional de Point Reyes
- Impacto en los pastizales de alto valor y daños al cercado
- Evaluar las potenciales acciones hechas dentro y adyacente a las operaciones activas de agricultura y ganadería para manejar el ciervo de California

Terrenos Inundables, Pantanos y Áreas Riberenas

- Zonas de amortiguamiento para la protección de la calidad del agua
- Mejoramiento del hábitat

Especies de Preocupación Especial

- Oportunidades de manejo para promover la protección de plantas y especies silvestres raras y vulnerables

Salud y Seguridad

- Estándares para la vivienda del operador y trabajador

Vegetación

- Restauración del prado nativo
- Dunas
- Manejo de especies no nativas
- Manejo del matorral
- Mejora del pasto/ incremento de la producción/ ensilaje
- Régimen de incendios

Uso del Visitante/ Recreación

- Programas interpretativos y de educación sobre las operaciones de agricultura y ganadería históricas y contemporáneas
- Acceso
- Oportunidades para la recreación
- Protección de la privacidad de los ganaderos

Planificación y protección de los Complejos de Ganadería

- Definir las áreas para la mejora de la infraestructura de ganadería
- Definir los roles y responsabilidades para el mantenimiento de la infraestructura existente

Estructuras Históricas

- Pautas para los estándares de mantenimiento de las estructuras históricas existentes
- Evaluar las oportunidades para el desarrollo o ubicación de nuevas estructuras en el contexto del paisaje cultural

Paisajes Culturales

- Protección de los Distritos Históricos de agricultura y ganadería de la era Shafter

¿Existen otras dificultades o preocupaciones que deberían ser consideradas mientras desarrollamos el CMP del Rancho?

Ciervo de California

Antecedentes del Ciervo de California

- El ciervo de California, una de las subespecies más pequeñas del alce norteamericano, solamente se encuentra en California. Los ciervos de California fueron erradicados de Point Reyes ya para los años 1860. Coherente a la Ley Pública 94-389, un total de 10 ciervos de California fueron reintroducidos exitosamente en una reserva natural cercada de 2.600 acres en Tomales Point en 1978. Esta manada en cautiverio ha llegado a ser una de las más grandes en California y consta de 350 a 500 animales.
- El Plan de Manejo del Ciervo de California/ Evaluación Ambiental (EA) de 1998 del parque estableció la manada a campo abierto con un número limitado provisional para su manejo de 250 a 350 ciervos de California. El Plan de Manejo del Ciervo de California/EA de 1998 no contemplaba la expansión del ciervo de California en las tierras de pastoreo.
- La manada a campo libre de ciervos de California fue establecida con 28 animales en 1999. Existen dos manadas a campo libre independientes.
- El Departamento de Pesca y Vida Silvestre de California (CDFW) administra la mayor parte de las otras manadas de ciervos de California en el estado.

Estatus Actual de las Manadas a Campo Abierto

- Manada del D Ranch—76 animales en total. La manada principal es generalmente un grupo unido de aproximadamente 60 ciervos de California integrados por hembras, ciervos de California jóvenes (o crías) y unos pocos machos. El resto de los machos forman de uno a dos grupos pequeños de animales, en etapa de reproducción, que se mantienen separados de la manada principal excepto durante la temporada de celo. La manada principal y los grupos en edad reproductiva pasan tiempo en el C Rancho, en el E Ranch, en el que antes era el D Ranch y en áreas circundantes donde no hay ganadería pastoril.
- Manada Limantour—71 animales en total. Estos ciervos de California están distribuidos sobre una amplia área que se extiende desde Coast Camp hasta tan al norte como el D. Rogers Ranch que está ubicado junto al Sir Francis Drake Boulevard. Las hembras, ciervos de California jóvenes y algunos machos permanecen en el área silvestre. Aproximadamente de 25 a 30 machos permanecen en las tierras del rancho que se extienden por el Estero Road a lo largo del área del Home Ranch. La mayor parte de la actividad se localiza al sur del Sir Francis Drake Boulevard con solamente 6 a 8 ciervos de California en un momento dado hacia la parte norte. Los machos regresan al área silvestre durante la temporada de celo.

Futuras Actividades de Manejo del Ciervo de California

Pruebas para la enfermedad Johne's Disease

- Johne's disease (paratuberculosis) es una enfermedad de contagio expansivo que puede ocurrir en la mayoría de los rumiantes y que se sabe ocurre en los ciervos de California de Point Reyes. Debido a la preocupación de que esta enfermedad de transmisión pueda afectar a las manadas no infectadas.
- La enfermedad Johne's disease sigue siendo una preocupación al momento de considerar cualquier alternativa en cuanto a la reubicación del ciervo de California. El NPS implementará un programa de pruebas de la enfermedad Johne's disease con la Universidad de Wisconsin – Centro de Pruebas de Johne en la primavera-verano 2014.

Reubicación Experimental dentro del Parque

- El NPS intenta capturar y reubicar de 3 a 4 de los ciervos de California más jóvenes del D Ranch de vuelta en el área silvestre para ver cuál es la reacción de estos ciervos de California. La reacción, ya sea la integración con la manada de Limantour o el retorno al D Ranch, ayudará a informar el manejo de potenciales soluciones dentro de este proceso de planificación.
- La temporada potencial para la reubicación podría ocurrir después del celo en el otoño 2014.
- El riesgo de la enfermedad de Johne's disease tiene que ser evaluado antes de que se haga cualquier reubicación.
- El Departamento de Pesca y Vida Silvestre de California (CDFW) ha observado que mudar a los animales adultos no es una estrategia viable porque estos regresan rápidamente a sus sitios de captura.

El Impacto del Ciervo de California en las Operaciones de Ganadería

Los operadores del Rancho han reportado un número de impactos y problemas con sus operaciones asociadas con el ciervo de California, los mismos que incluyen:

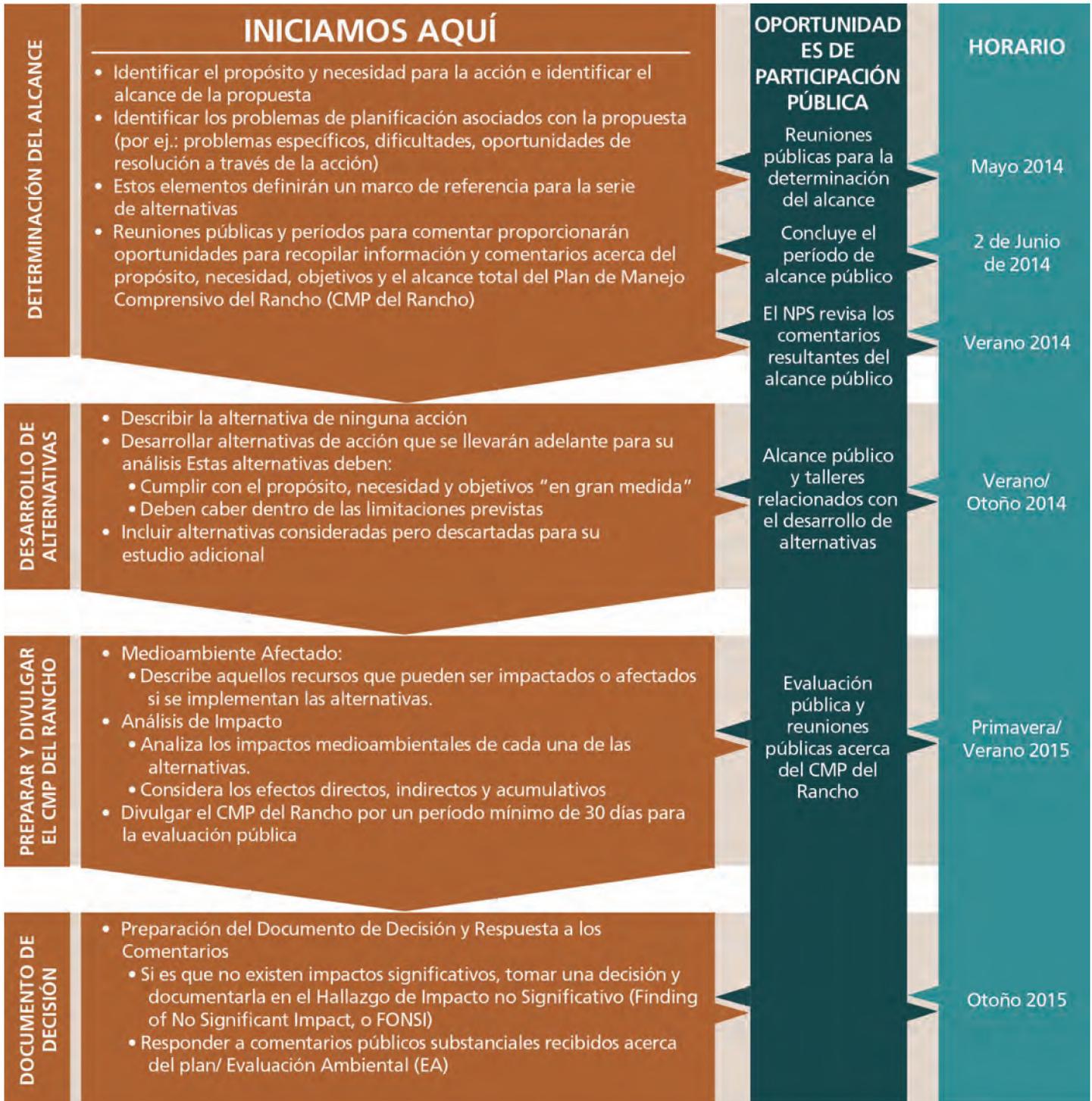
- Pérdida de forraje causado por el consumo directo de los ciervos de California
- Imposibilidad de hacer descansar los pastizales y permitir que el forraje crezca a sus niveles máximos
- Daños a las cercas y otra infraestructura
- Dificultad en mantener el ganado dentro de los pastizales deseado por causa de los daños a las cercas
- Preocupación de que los estándares orgánicos no se cumplan por causa de la pérdida de forraje para los ciervos de California
- Consumo de agua para el ganado
- Preocupación por las enfermedades que transmiten los ciervos de California al ganado, especialmente la enfermedad Johne's disease

Actividades de Manejo Recientes de los Ciervos de California

- Monitoreo continuo desde el otoño de 2010
- Cruce continuo de los ciervos de California y reparación de las cercas del ganado desde 2011
- Proyecto de agua del D Ranch completado en 2013
- Desde 2012, utilización de métodos de hostigamiento para que la manada principal salga de las tierras activas del rancho

Proceso de la ley NEPA

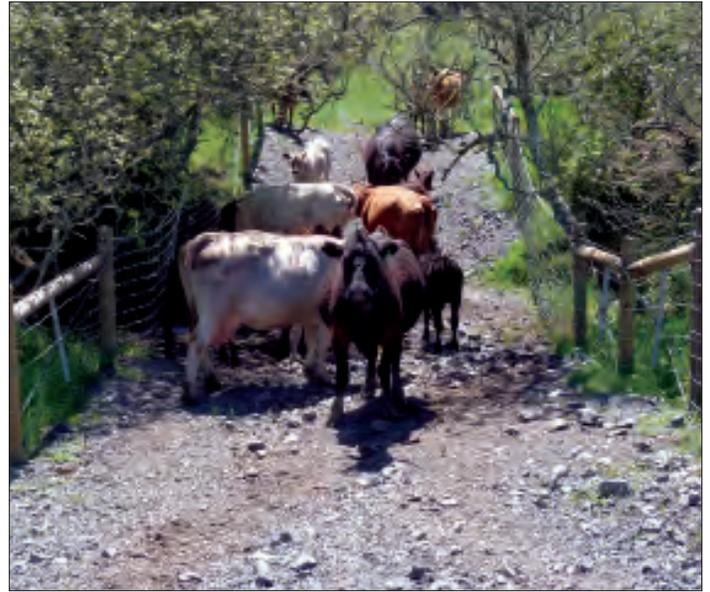
La Ley Nacional sobre Política Ambiental (NEPA) es un requerimiento legal para las agencias federales, es mejor describirlo como un proceso de planificación ambiental. Lo siguientes pasos describen el proceso:



Buenas Prácticas de Manejo

Las actividades de agricultura y ganadería propuestas, identificadas como Buenas Prácticas de Manejo, que pueden ser consideradas como parte de este proceso de planificación incluyen:

- Reparación y mantenimiento de caminos de acceso primario
- Establecimiento de senderos para el ganado así como sitios para abrevaderos para el alimento y bebederos
- Área crítica para el cultivo
- Area de filtro
- Paso para la pesca
- Estabilización de pendientes/ Estructuras para la reparación de la erosión en cabecera
- Senderos con zacate
- Senderos forrados
- Tubería
- Cuenca sedimentaria
- Desarrollo de manantial/fuente
- Protección de la ribera del riachuelo
- Estabilización del canal del riachuelo
- Mejoramiento del hábitat del riachuelo
- Estructura para el control del agua
- Desagüe subterráneo
- Cuenca para el control del agua y sedimento
- Cercado
- Mantenimiento de estanque (limpieza de sedimentos de los estanques, mantenimiento de bermas, etc.)



Paso de Ganado



Cerca/ Mejoramiento del hábitat del riachuelo



Bebederos

Potenciales Impactos

Los temas de potencial impacto apuntan a aquellos recursos o valores que están actualmente afectados o podrían ser afectados por las acciones propuestas. El NPS ha identificado la siguiente lista de temas de impacto para un análisis detallado del CMP del Rancho:

- Recursos geológicos
- Calidad y cantidad del agua
- Terrenos inundables, pantanos y áreas ribereñas
- Vegetación
- Pesca, vida silvestre y hábitat asociado
- Especies de especial preocupación
- Experiencias del visitante y recreación
- Recursos culturales incluyendo los Distritos Históricos de Agricultura y Ganadería; Paisajes Culturales; Estructuras Prehistóricas e Históricas.
- Socioeconomía
- Salud y Seguridad
- Operaciones del parque

Opciones para el Comentario del Público

Hay varias maneras de enviar sus comentarios sobre este plan/EA:

1. Por Internet a través del sitio de Planeación, Medioambiente y Comentario Público del NPS en: <http://parkplanning.nps.gov/ranchcmp> (el método preferido)
2. En persona durante las reuniones a puerta abierta, ya sea grabadas en las estaciones para comentario o entregando su comentario en las hojas o formularios proporcionadas en la reunión.
3. Enviar por correo postal o entregar por mano propia en las oficinas principales del parque:

Point Reyes CMP/EA
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

El período para el comentario del público se cierra el:

2 de junio de 2014

Enseguida se encuentran algunas preguntas para la determinación del alcance que usted podría considerar cuando revise el borrador del propósito, necesidades y objetivos del proyecto propuesto.

- ¿Qué cree usted que el NPS debería tomar en cuenta en el desarrollo del CMP del Rancho?
- ¿Cuáles son los asuntos más importantes que usted cree que necesitan ser tomados en cuenta, respecto a las tierras bajo el arrendamiento agrícola/permisos?
- ¿Cuáles son actividades de agricultura y ganadería razonables, en futuro inmediato, que deberían considerarse y revisarse como parte de este plan?
- ¿Cuáles son acciones razonables, en futuro inmediato, relacionadas con el manejo del ciervo de California (*Cervus canadensis nannodes*), que afecta las operaciones del rancho del parque, que deben tomarse en cuenta como parte de este plan?
- ¿Cuáles son acciones potenciales del parque, relacionadas con el manejo de recursos naturales y culturales en tierras del rancho, que deberían tomarse en cuenta como parte de este plan?
- ¿Como miembro del público, qué necesita usted del NPS para involucrarse de manera significativa en el proceso de planeación?

Los comentarios no serán aceptados por FAX, correo electrónico (e-mail), o algún otro modo distinto al especificado anteriormente. Los comentarios por correo masivo en cualquier formato (impreso o electrónico) entregadas de parte de otras personas no serán aceptados. Antes de incluir su domicilio, número telefónico, correo electrónico (e-mail) u otra información personal que lo identifique, usted deberá estar consciente de que su comentario completo—incluyendo su información personal que lo identifique—podrá hacerse pública en cualquier momento. Aunque usted nos puede solicitar en su comentario que no se haga pública su información personal, no se podrá garantizar el cumplimiento de dicha solicitud.