



# General Management Plan Amendment

## Point Reyes National Seashore

### *Public Scoping Comment Summary Report*

April 2019

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## Introduction

The National Park Service (NPS) initiated the formal National Environmental Policy Act (NEPA) process and began a 30-day public scoping period for the General Management Plan Amendment (GMP Amendment) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area with the publication of the Notice of Intent (NOI) in the Federal Register on October 31, 2018. The public was invited and encouraged to share their observations, concerns, and ideas to help refine the purpose and need, range of alternatives, and impact topics that will be analyzed in the Draft Environmental Impact Statement (EIS). The 30-day comment period closed on November 30, 2018. During this time, two open house meetings were held at different locations near the park. A total of 160 people attended the two meetings. The public was encouraged to submit comments through the NPS's Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/POREGMPA>). Comments were also accepted at the meetings, by US mail, and in person at the park. Over 1,350 pieces of correspondence were received during the comment period.

This report presents additional concern statements that were developed based upon the correspondence received during the public scoping period in November 2018. The information presented during the public scoping period was refined and expanded based on the comments received during the initial comment period in fall 2017, as well as additional data and information gathered by park staff over the past year while preparing to initiate the EIS process. This report, along with [the report prepared in February 2018](#), constitute a comprehensive summary of substantive comments that were submitted during both comment periods and will assist the NPS in preparing the draft EIS for the General Management Plan Amendment.

## Definition of Terms

Primary terms used in the document are defined below.

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

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

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

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

## Comment Analysis Methodology

Correspondence was received via US mail or delivered in person at the park, comment forms submitted at the public meetings, oral statements recorded on flip charts during the public meetings, or correspondence entered directly into the internet-based PEPC system. Letters received through the US mail, or submitted in person at the park, as well as the comments received from the public meetings, were entered into the PEPC system for analysis. If attachments, such as articles or photos were submitted, this was noted in the PEPC entry so they could be reviewed.

Using the February 2018 comment summary as a starting point, all of the correspondence was read and reviewed with a focus on identifying new ideas, comments or concerns for consideration by the planning team when preparing the draft EIS. New content was identified as a comment and each comment was given a code to identify the general content of a comment and to group similar comments. Twenty-four codes were used to categorize the public comments received during the public scoping period. An example of a code developed for this project is *AL2000 – Alternative Concepts: Ranching*. In some cases, the same comment may be categorized under more than one code, reflecting the fact that the comment may contain more than one issue or idea

## **Concern Report**

Tables 1 through 24 summarize the new and/or unique comments received during the public scoping period and are organized by code.

**Table 1. AL1200 – Alternative Concepts: Reduced Ranching and Management of the Drakes Beach Tule Elk Herd (Alternative D)**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
1	Commenters suggest that the "Reduced Ranching" alternative contains no justifiable rationale for its proposed elimination of specific ranches containing no residences, is inconsistent with Congressional intent and should be amended to reduce ranching only where there is an arguably justifiable reason.

**Table 2. AL1500 – Alternative Concepts: Continue Current Management (Alternative A, No Action)**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
2	Commenters state that the correct no-action alternative is one that does not renew leases to ranches.

**Table 3. AL2000 – Alternative Concepts: Ranching**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
3	Commenters request the following terms be defined in the EIS: unsustainable, industrial, diversification, operational flexibility, sensitive resources, park resources, sustainable, and promotion of sustainable agriculture.
4	Commenters request that the EIS disclose the data used in the development of ranch carrying capacities and forage calculations, explain the rationale for using certain data, and address how these factors have changed since the 1980 GMP and are likely to change in the future.
5	A commenter asked whether the NPS will pay to relocate displaced ranchers under any of the reduced ranching alternatives.

**Table 4. AL2100 – Alternative Concepts: Tule Elk Management**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
6	Commenters express concern, that lethally removing elk because they create a conflict for ranchers, could set a precedent for removing other wildlife that come into conflict with the ranchers.
7	Commenters express concern that under the current fiscal climate and constraints, the NPS cannot realistically manage a new elk herd at Drakes Beach.
8	Commenters suggest that the minimum viable population (MVP) for the Drakes Beach and Limantour herd combined should be 100 which would allow for the MVP to be satisfied by the Limantour herd and for the Drakes Beach herd to be managed at a level that would allow for balancing conflicting uses.
9	Commenters suggest an alternative for elk management that involves restoring habitat in the Muddy Hollow/Limantour area, moving the Drakes Beach herd moved there, and returning the highly visible historic D Ranch to active agriculture.
10	Commenters request that the NPS disclose the criteria used for determining how to cull or remove Tule elk from the park.
11	A commenter requests clarification about what is meant by pasture offsets and why they should be considered.

**Table 5. AL2200 – Alternative Concepts: Diversification**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
12	Commenters request that the EIS explain how the proposed diversification activities would benefit the American public.
13	A commenter requested that growing quinoa be approved as a diversification activity.
14	A commenter requests that the EIS clarify whether commercial diversification conflicts with the NPS Concession Act and cite which authority would be used to permit diversification activities.
15	A commenter requests that the EIS consider one cooperative creamery that uses an existing ranch core building for processing, selling only products produced on the ranch and having up to six pigs to consume whey produced by the creamery.

**Table 6. AL2300 – Alternative Concepts: Silage**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
16	A commenter states that the EIS should analyze whether silage effects can be mitigated by harvesting for haylage instead of silage.

**Table 7. AL2350 – Alternative Concepts: Pasture Management**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
17	A commenter requests that the EIS evaluate options for removing invasive brush from pastureland and conduct research studies to identify water quality impacts resulting from the continuation of brush control vs. brush control prohibitions.

**Table 8. AL2400 – Alternative Concepts: New Alternatives or Elements**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
18	A commenter suggests that if ranches are to remain, ranchers should raise elk instead of cows for commercial purposes.
19	A commenter requests that the EIS consider how to encourage and support the return of black bear to the park.
20	A commenter requests that the EIS assess the impacts of producing and selling electricity and compost using onsite materials as part of normal dairying authorizations.
21	A commenter requests that the EIS consider running one large beef herd on the contiguous landscape using rotational grazing practices.
22	A commenter requests that the EIS consider allowing existing lessees to use idle pastoral lands adjacent to the ranches, specifically land adjacent to J Ranch.
23	A commenter suggests that the EIS analyze the expansion of water sources by enlarging dams, digging additional wells, or using creeks as a backup water supply during drought years.
24	A commenter requests that the EIS include an alternative to address removing the free-range elk herds (Drakes Beach and Limantour) from the agricultural properties as analyzed in the 1998 Elk Management Plan. The commenter also notes that the description of alternatives in the scoping notice is misleading because it presumes the current extent of the elk herds in the park is currently approved in the existing GMP.
25	A commenter proposes a no dairy alternative with conversion to beef which would allow the elk population to grow with AUM requirements acting as a mechanism for retiring beef cattle grazing in years where there may not be adequate forage.

**Table 9. AL2500 – Alternative Concepts: GMP Elements**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
26	Commenters made multiple suggestions regarding development of new trails, trail connections and cross-park trails. Other commenters suggested that certain trails in the park are not designed to safely accommodate multiple uses.
27	A commenter requests that the EIS improve elk viewing opportunities for non-hiking visitors by introducing elk closer to Sir Frances Drake Boulevard and removing tour buses from Pierce Point Road due to congestion issues.
28	A commenter requests that birding access be included in the elements common to all action alternatives.
29	Commenters suggest that the EIS consider visitor amenities at Laird’s Landing including interpretive displays, picnic tables, and trail maintenance as well as consider the following amenities throughout the park: low-cost overnight accommodations such as campgrounds, cabins, yurts or tent cabins.
30	A commenter stated that all roads in the park should have separate bike paths or at least bike lanes.

**Table 10. AL2600 – Alternative Concepts – Land Management Units**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
31	A commenter requests that the conservation framework/land management units (LMUs) be applied to all alternatives, not just alternative B.
32	Commenters request clarification on what Land Management Unit designations mean for range and pasture, and whether range and pasture have been identified on each ranch.
33	Commenters expressed concern about the proposed LMU designations limiting the ability of ranchers to make progress toward meeting desired conditions and also state that ranchers, conservation experts, and Point Reyes should be able to discuss, plan, and implement reasonable conservation practices, diversification and other uses as appropriate on ranch lands taking into account the unique landscapes of each of the working ranches and dairies.
34	A commenter suggests that impacts to soil and water can be seen on slopes less than 20% and requests that the EIS provide the rationale for the use of the 20% slope threshold used to develop the LMUs.
35	A commenter requests that, as part of the Conservation Framework, the EIS analyze opportunities for new structures to be added within the ranch core, specifically a loafing barn at L Ranch.
36	Commenters state that the flexibility to restore practices of the Shafter era both within and outside the ranch core is vital to the long-term sustainability of the family farms in the planning area.
37	The commenter suggests that where conflict arises between natural resources and lease holders, the NPS consider compensating ranchers for loss of production (e.g. compensation for the loss of forage or milk production and damage to fencing due to encroachment of elk).



**Table 11. PL3000 – Purpose, Need and Objectives**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
38	The commenter requests that the need statement clarify the issue (i.e., underlying problem, conflict, or opportunity) regarding management of the leased lands and identify the full suite of "highest priority planning issues" that the NPS seeks to address through the proposed action.
39	Commenters suggest the following objectives be included in the EIS: <ul style="list-style-type: none"><li>• Clarify NPS and Ranchers' expectations and commitments to ensure consistency of agricultural lease/permits, and</li><li>• 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.</li></ul>
40	One commenter suggests that the purpose and need of the EIS be broader to include restoring, protecting, and enhancing the natural resources, and provide opportunities for enhanced, high-quality, resource-based visitor experiences to allow for success at accomplishing multiple, sometimes conflicting, resource goals.
41	One commenter requests that the purpose of the EIS be reworded to state that proposed management will be consistent with the Organic Act and the Point Reyes and Golden Gate enabling legislation.

**Table 12. IS1000 – Issues and Impact Topics: Air Quality**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
42	A commenter requests that the EIS disclose (1) greenhouse gas emissions with and without livestock and from using machinery to manage livestock and grow and transport imported forage, and (2) the ammonia and noxious gas production levels from the beef and dairy facilities and their degree of compliance with the Clean Air Act and Regional Air Quality Management District guidelines.
43	A commenter recommends that the EIS disclose the current status of the planning area with respect to attainment of national ambient air quality standards; identify all sources of air quality emissions, including those from agricultural operations, that would occur under each alternative; and quantify emissions to the extent possible to facilitate comparisons across alternatives.

**Table 13. IS1100 – Issues and Impact Topics: Cultural Resources**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
44	A commenter states that the EIS should evaluate historic ranch districts for World Heritage Site status and manage the lands consistent with World Heritage Site principles for managing Continuing Cultural Landscapes.
45	Commenters request that the EIS present the condition of archeological features and protection they have/will receive to prevent impacts from cattle. The commenter also requests that a map and list of historic structures as listed under the California State Historical Building Code be included in the EIS.
46	A commenter suggests that cattle/dairy ranching is not rare or unique in California or throughout the West and the EIS should put the management of the cultural landscape at Point into a larger context. The commenter requests a full analysis of impacts caused by domestic livestock and suggests that the lands in the park should be managed primarily to preserve natural ecological processes.

**Table 14. IS1200 – Issues and Impact Topics: Socioeconomics**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
47	A commenter requests that the EIS report the costs and proportion of the park budget to manage agricultural businesses in the park under each alternative and explain how these costs would differ from current livestock management costs.
48	A commenter requests that the NPS work with local nonprofit organizations to restore vacant housing and create affordable housing in the park.
49	A commenter requests that the EIS evaluate whether continued dairy ranching in the park would contribute to the failure of ranches elsewhere in the region, and evaluate the environmental consequences that would result from a contraction of the dairy industry outside the park.

**Table 15. IS1300 – Issues and Impact Topics: Species of Special Concern**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
50	A commenter states that the EIS should consider federal recovery plans for the Central California Coast Evolutionary Significant Unit coho salmon and the Central California Coast Distinct Population Segment steelhead.

**Table 16. IS1400 – Issues and Impact Topics: Visitor Use and Experience**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
51	A commenter states that the EIS should analyze annual, seasonal, peak-day, and daily visitor volumes that can be effectively supported park staffing and infrastructure resources.

**Table 17. IS1500 – Issues and Impact Topics: Vegetation**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
52	A commenter expresses concern about the use of residual dry matter (RDM) monitoring being the primary metric for determining stocking levels as these guidelines were developed to prevent soil from excessive erosion but will not ensure a return to original vegetation composition. The commenter suggests that robust monitoring of both RDM and species composition should guide management decisions.
53	A commenter requests that the EIS include impacts to vegetation from disease and climate change in the cumulative impacts analysis.
54	A commenter requests that the EIS disclose the amount and types of supplemental feed trucked into the park, where it is grown, and consider the potential for introduction of invasive plants.
55	Commenters request that the EIS analyze whether continued ranching may increase the intensity of wildfires.
56	A commenter states that the park should assess and correct problems with the draft report 20 Years of Rangeland Monitoring in Point Reyes National Seashore and that the EIS should identify milestones in the 20-year leases to determine whether adjustments to grazing should be made. The commenter also requests that all underlying data and monitoring results be made publicly available.
57	Commenters request that the EIS analyze how each alternative would affect invasive species distribution, and present maps of rare, sensitive, endangered and invasive plant species.
58	A commenter requests that the EIS include available data on past locations of plant communities, noting that vegetation maps are available from the 1970s along with photographed transects from 1967, 1971 and 1975 at 15 ranches at Point Reyes.

**Table 18. IS1800 – Issues and Impact Topics: Wildlife and Wildlife Habitat**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
59	A commenter requests that the EIS analyze impacts of domestic livestock on Tule elk, including social displacement of elk.
60	Commenters request that the EIS discuss the specific interactions and conflicts between elk and cattle and the need for additional study and adaptive management to reduce or remove conflicts.
61	A commenter requests that the EIS disclose documented failures of overhead power lines and analyze the potential they have to create wildfires.
62	The commenter requests that the EIS evaluate impacts to wildlife from ranch operations (sound/vibration disturbance from equipment on nesting birds, ground-dwelling and fossorial animals, and native predators), and from infrastructure including satellite dishes, wireless internet, and cell receiver masts.
63	A commenter states that the EIS should analyze the impacts of disease transmission from domestic house pets, including, but not limited to, canine distemper on marine wildlife as well as the impacts from domestic cats on native wildlife.
64	Commenters suggest that the NPS explore the use of historic structures as wildlife habitat.
65	A commenter requested the NPS provide ranchers the opportunity to shoot elk as a management tool.

**Table 19. IS1900 – Issues and Impact Topics: Water Resources**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
66	A commenter recommends that the EIS evaluate the potential impacts of each alternative on water quality in the Greater Farallones National Marine Sanctuary’s near-shore and estuarine environments, including Tomales Bay.
67	A commenter recommends that the EIS include a comparison of the water usage requirements of each alternative, including a comparison of the water usage requirements of any proposed food or feed crops as well as projected impacts on each water source.
68	A commenter states that the EIS should consider the impact of agricultural diversification and increased recreational facilities (trails, picnic areas, and housing with associated restrooms/septic) with regard to total maximum daily loads (TMDLs) and ensure that proposed actions comply with the SF Bay Regional Water Quality Board regulatory programs.
69	A commenter states the EIS should analyze watershed-scale processes such as geomorphic (sediment generation and transport and geomorphic functions) and hydrologic (stormwater runoff characteristics, streamflow and groundwater recharge and discharge) processes.
70	A commenter requests that the EIS include maps of riparian areas, meadows, water developments and the documentation of their condition, including water quality and fecal coliform bacteria, sedimentation, and condition of banks and vegetation.
71	A commenter suggests that there is the potential for significant increase in generation and discharge pollutants if increased agricultural diversification occurs in ranch core areas.
72	The commenter requests that the EIS analyze (1) the drivers of water quality degradation and the effectiveness of livestock management and conservation practices to improve water quality in range livestock operations settings and (2) the progress and beneficial impacts made and to-be made through the planning and implementation of water quality improving conservation practices on dairies and grazing cattle ranches.

**Table 20. LP1000 – Laws/Policies Issues**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
73	A commenter requests that the EIS describe the Organic Act and NPS Management Policies because they define the standards that apply to ranch management and that best management practices must be mandatory because of these laws and policies which require range conditions under each lease to be improved.

**Table 21. LE1000 – Lease/Permit Issues**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
74	A commenter expresses concern that the NPS is not enforcing the policy to modify grazing practices on ranches that are in violation of lease conditions.
75	A commenter requests all current lease/permits for ranches be made publicly available, noting that the L Ranch lease/permit is dated 2009.
76	A commenter requests more transparency in the appraisal process, noting existing comparisons are not adequately representative and may result in overly discounted rent values and that the public be allowed to review and challenge appraisals.
77	A commenter requests that new lease/permits address the condition of ranch/dairy worker housing and require that lease holders maintain housing according to federal, county, and lease holder standards.
78	A commenter suggests that ranching should be phased out in 10 years, rather than 5 years.

**Table 22. ON1000 – Other NEPA Issues**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
79	A commenter states that the background of the EIS should include the original purchase price of the ranches and explain the terms and conditions of the acquisitions.
80	A commenter requests that the EIS present a map of all infrastructure used to manage livestock, such as fences and water developments.
81	A commenter requests detailed background information be included in the “Affected Environment” section of the EIS regarding the historic trends in environmental quality pertaining to range condition, water quality, bird abundance, wetland and riparian land conditions, and other issues so that the public can understand the baseline condition of the resources and propose alternatives and mitigation to improve conditions.
82	A commenter requests that the NPS provide rationale for why alternative B should be preferred and that the Point Reyes website should contain an administrative record that provides full text or links to all significant scientific and policy information that was used to select the proposed alternative.
83	A commenter requests NPS to disclose that the current lease/permits were reviewed as categorical exclusions under NEPA.

**Table 23. PL1000 – Planning Process**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
84	Commenters request that the EIS describe how the ranchers and the public will be informed regarding any changes to ranch management that result from this planning process and request a detailed roll-out process with target dates to accomplish any changes be prepared.

**Table 24. RF1000 – Suggested References**

<b>Concern ID</b>	<b>Corresponding Concern Statement</b>
85	Commenters request that additional references to be reviewed and considered during the preparation of the EIS associated with the following topics: cultural resources, socioeconomics, species of special concern, vegetation, public health and safety, soils and geology, wildlife and wildlife habitat, water resources, and climate change.