

# MARIN EQUESTRIAN STABLES PLAN ENVIRONMENTAL ASSESSMENT

## ERRATA

## AND

## RESPONSE TO COMMENTS

August 2013

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### **INTRODUCTION**

These Errata were prepared as an attachment to the Environmental Assessment which was released for public review from November 1 to December 16, 2011. The corrections described herein do not change the project activities nor increase the degree of impact described in the Plan/EA. Necessary changes to the text and explanations are provided below, followed by responses to comments received from individuals, groups, and regulatory agencies.

The National Park Service (NPS) prepared an Environmental Assessment (EA) to analyze the potential effects of alternatives for the location and improvements of equestrian stables in Marin County's Golden Gate National Recreation Area lands. There are four stables in southern Marin County on lands administered by NPS within the GGNRA. The stables are the privately operated sites at Golden Gate Dairy in Muir Beach, at Rodeo Valley, and at Tennessee Valley. The fourth stable is home to the Park Horse Patrol in Lower Tennessee Valley. These four stables house 76 horses all year with additional horses in the summer time.

This Plan/EA describes and analyzes four alternatives; three action alternatives and one no-action alternative. The purpose of the Plan/EA is to provide for comprehensive improvement of equestrian sites, facilities, programs, and stables management. The Plan/EA is designed to improve visitor services, and to preserve, protect and enhance the park natural and cultural resources in a manner consistent with NPS plans and policies. Site capacity, horse health and financial feasibility have been considered in the alternatives. Best Management Practices are established for the protection of resources and safety. The NPS Preferred Alternative was Alternative B, Option B2.

On November 1, 2011, the Marin Equestrian Plan Environmental Assessment was released for public review in a formal 45-day comment period that closed on December 16, 2011. The EA was circulated to local, state, and federal agencies, interested organizations, and individuals to allow review and comment on the report. Publication of the Plan/EA on the National Park Service Planning, Environment and Public Comment (PEPC) website (<http://parkplanning.nps.gov/>) marked the beginning of the public comment period during which written comments were accepted. The NPS conducted a public meeting during the comment period on December 7, 2011 at the Tamalpais Community Center.

The Selected Alternative is the Preferred Alternative B; Option "B2".

### **CHANGES TO TEXT OF THE PLAN/EA**

Changes to the text to reflect modifications made in response to public and agency comment. Existing text to remain is in *italics*, additions to the text are underlined and deleted text is shown in "~~strikeout~~" text.

## NPS Park Horse Patrol

### Pages 2-13 through 2-14, Alternative B - Enhanced Existing Option B2, 6th paragraph

#### Option B2

*Under Option B2, site changes to Golden Gate Dairy and Rodeo Valley stables would remain the same as those described above for Option 1. Option B2 would also include the components common to all alternatives, as described above in Section 2.3.2. ~~with~~ Changes specific to this option ~~as~~ are described below.*

*Option B2 would relocate Park Horse Patrol operations out of Lower Tennessee Valley to Rodeo Valley Tennessee Valley stables. New paddocks and stalls would be constructed, and existing historic buildings would be rehabilitated at all stable sites to accommodate the horses utilized by Park Horse Patrol operations and by other programs. The designation of specific stalls to be utilized by Park Horse Patrol would be determined at a later date. Once the Lower Tennessee Valley site is vacated, the equestrian stalls, paddocks, other stable facilities, would be removed. The existing nursery facilities, yurt, barn and campground would be addressed as part of site-specific future planning.*

***Other Identified Uses and Needs.** Under Option B2, the actions at Rodeo Valley stables would be the same as for Option B1 except that NPS would ~~might~~ utilize the Balloon Hangar as described in Alternative D, for long-term interim use for approximately 10 years. In this case, The West Motor Pool Building could be remodeled to create an indoor exercise ring, and hay and feed ~~could~~ would be placed in a shed or steel container 25 feet south of the West Motor Pool Building. Hay storage may remain in the West Motor Pool Building if it has no overnight residency or horses stabled there, or if fire-protection is accepted by NPS. After repair and potential NPS use of the Balloon Hangar, hay and feed storage and an indoor riding ring would be located in the Hangar. The long-term interim use of the Balloon Hangar by NPS would continue until funding is identified to construct the proposed new NPS Operations facility in the Marin Headlands. In all cases, Due to its condition, the Balloon Hangar will be temporarily closed until repaired.*

*The total numbers of horses and stalls would be 72(plus 22 visiting and dry season horses) and would remain unchanged at Rodeo Valley, Tennessee Valley, and Golden Gate Dairy from Alternative A – No Action. The number of horses housed at Rodeo Valley would remain at 19 including those horses in the Park Horse Patrol program. at Tennessee Valley would increase by four to 46 in order to accommodate Park Horse Patrol operations. Table 2-7 provides a summary of proposed modifications to each facility and Figures 2-11 through 2-13 except as amended in this errata See Figures E.2-7; Golden Gate Dairy, E.2-11; Tennessee Valley, and E.2-13; Rodeo Valley display conceptually how the existing sites would be modified under Option B2. See page E-14 for a list of changes in these Errata.*

The edits to Alternative B, Option B2 (the Selected Alternative) result in moving Park Horse Patrol to Rodeo Valley instead of Tennessee Valley. In the sections listed below, wherever the Park Horse Patrol is mentioned for Tennessee Valley, the text is changed to Rodeo Valley. These edits concerning the location of the Park Horse Patrol program apply to text on the following pages:

**Page ES-3, Alternative B: Enhanced Existing, paragraph 5**

**Page 2-3, Table 2-2 Summary of Alternatives**

**Page 2-4, Alternative Description - Preferred Alternative, paragraph 2**

Page 2-16, Alternative B - Option 2, Column 2/Row 3  
 Page 4-12, Geology and Soils, paragraph 7  
 Page 4-46, Water Resources, paragraph 4  
 Page 4-47, Water Resources, paragraph 3  
 Page 4-56, Wildlife, paragraph 2  
 Page 4-65, Special Status Species, paragraph 3  
 Page 4-88, Cultural Resources, paragraph 4  
 Page 4-92, Cultural Resources, paragraph 2  
 Pages 4-112 and 113, Visitor Experience, paragraphs 6 and 1  
 Page 4-120, Transportation, Impacts of Alternative B, paragraphs 2 and 3  
 Page 4-129, Visual Impacts of Option B2, paragraph 1  
 Page 4-131, Visual Impacts of Alternative C - Lower Tennessee Valley Stables, paragraph 2  
 Page 4-149, Park Operations Impacts of Alternative B - Option B2, paragraph 2

While there would be some minor site design changes in the Selected Alternative due to moving Park Horse Patrol from Lower Tennessee Valley to Rodeo Valley instead of to Tennessee Valley, the site boundary and area of potential disturbance would remain unchanged. Overall impacts, mitigation measures, and conclusions regarding impairment for every resource topic would remain identical to those described in the EA.

#### Golden Gate Dairy – Revised To Show Existing and Proposed Horse Hotel Use:

Chapter 2- Alternative A- No Action  
[2-5]

<i>Table 2-3 Comparison of Existing Stable Operations Under Alternative A - No Action</i>					
<i>Site Location</i>	<i>Current Permittee</i>	<i>Business Type</i>	<i>Process for Selecting Boarders</i>	<i>Public Programs</i>	<i>Estimated Annual Riders Served</i>
<i>Golden Gate Dairy</i>	<i>Ocean Riders</i>	<i>Non-profit 501(c)x</i>	<i>Interview</i>	<i>Allows public to tie-up horses short-term, "<u>horse hotel</u>,"</i>	<i>50</i>

[p2-6] No Action

<i>Table 2-4 Horse Capacity at Existing Stables</i>			
<i>Location</i>	<i>Overnight Capacity (No. of Horses)</i>		
	<i>Permanent Year-Round Horses in Stalls</i>	<i>Additional Seasonal Capacity (summer only)</i>	<i>Short-term Visiting Year-Round (Horse Hotel)</i>
<i>Golden Gate Dairy</i>	<i>11</i>	<i>0</i>	<i><del>0</del> 4</i>
<i>Total No. of Overnight Horse Facilities</i>	<i>76</i>	<i>10</i>	<i><del>42</del> 16</i>

#### Visitor Experience and Programs

...Overnight, short-term "horse hotel" accommodations for up to four visiting horses at the Tennessee Valley site, four at Golden Gate Dairy, and up to eight visiting horses at the Rodeo Valley site would continue to be available...

Existing visitor programs include:

Golden Gate Dairy Stables: The current permittee, Ocean Riders of Marin, currently has no public programming offered at this location. Previously, the permittee offered a program for abused children and had executed a program for school children. The stables offers daytime tie-up for visiting equestrian group rides and overnight "horse hotel" accommodations.

Table 2-7 Alternative B – Option B1 (4 sites) Enhanced Existing Summary of Proposed Changes				
Site Location	New Facilities	Facilities Remodeled	Facilities Removed	Number of Year-round Horses in Stalls
Grand Total				76 (plus <del>22</del> 24 visiting and dry season horses)

**Site Revisions at Tennessee Valley and Rodeo Valley Stables Due In Part to Moving the Park Horse Patrol in the Selected Alternative:**

Table 2-8 Alternative B – Option B2 (3 sites) Enhanced Existing Summary of Proposed Changes compared with Alternative B – Option 1				
Note: The proposed actions would remain the same as Alternative B-Option B1 <u>with the following additions and deletions to the table:</u>				
Site Location	New Facilities	Facilities Remodeled	Facilities Removed	Number of Horses compared to Option B1
Golden Gate Dairy		- Front turn-out: Front paddocks (not stalls) can remain- Designate short-term visitor parking space. <u>LEASE OPTION:- The Creamery Building may be included in the lease and if so, could be remodeled for stalls, office meeting or storage.</u>		
Tennessee Valley	<del>Install four stalls, paddocks, and PHP use area to accommodate PHP operations.</del> OPTION: 1) <u>Add stalls north of covered arena</u> 2) <u>Add Manure shed in historic core area</u> 3) <u>Add Hay shed between Hay Barn and Bunkhouse</u>	<del>Rehabilitate main residence and Red barn building for PHP office and storage.</del> <del>Rehabilitate bunkhouse for continued residence use.</del> OPTION: Hay barn could be remodeled for stalls. OPTION: Main Residence could be rehabilitated for residential or office use.		+4
Lower Tennessee Valley			-Remove PHP facilities associated with equestrian operations including manure shed, stalls, paddocks and turnouts.	-4

Rodeo Valley	<p><b><u>Add Manure Shed south of Motor Vehicle Sheds</u></b></p> <p>-Long-term <del>interim</del> NPS operations use of Balloon Hangar will require <b><u>OPTION:</u></b></p> <p>1) <u>an alternative facility [shed or steel container] for long-term <del>interim</del> Hay/feed storage, and</u></p> <p>2) <b><u>OPTION:</u></b></p> <p>a) <u>Remodel of West Motor Pool Building to include a small covered ring, or,</u></p> <p>b) <u>Covered ring in upper level area west of Balloon Hangar</u></p>	<p>-Rehabilitate Balloon Hangar for long-term NPS <del>interim</del> use</p> <p><b><u>LEASE OPTION:</u></b> Rebuild fuel shed for use</p> <p><b><u>OPTION:</u></b> Rehabilitate West Motor Vehicle Shed for 2 offices</p> <p><u>Rehabilitate West Motor Vehicle Shed north end for Residential unit unless operator can provide acceptable alternative for equestrian safety and monitoring.</u></p>		
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Revision to **Table 2-11 Description of Alternatives Considered but Eliminated from Further Analysis - Column 2, Row 20 (below)**- (below), removes the elimination of locating the Park Horse Patrol at Rodeo Valley stables.

<b>Table 2-11 Description of Alternatives Considered But Eliminated from Further Study</b>	
<b>Description</b>	<b>Reason Eliminated</b>
<i>Locate PHP stables at Rodeo Valley.</i>	<i><u>Not centrally located, NPS prefers Tennessee Valley location. The National Park Service determined that Rodeo Valley stables has sufficient room for the Park Horse Patrol program: stalls, offices, and support facilities such as hay storage and parking at the Rodeo Valley site and determined to locate the Park Horse Patrol there, rather than at Lower Tennessee Valley, Tennessee Valley, Marincello or Golden Gate Dairy.</u></i>

## Revised Maps

New maps (attached) show the revised site plans at each stable site.

### **Page 2-46, Figure 2-7 Golden Gate Dairy stables**

Replace with new site plan, shown on page E2.7. The site plan for Golden Gate Dairy stables has changed to show paddocks in front turn out, relocation of emergency water to front of site, and optional change of use of Creamery Building.

### **Page 2-50, Figure 2-11 Tennessee Valley stables**

Replace with new site plan, shown on page E2.11. The site plan for Tennessee Valley stables has changed to remove stalls, headquarters and Hay/Feed storage for Park Horse Patrol, and show optional locations of Hay Shed, Manure Shed and Stalls. The designation of Residence has been removed from the Bunkhouse.

### **Page 2-52, Figure 2-13 Rodeo Valley stables**

Replace with new site plan, shown on page E2.13. The site plan for Rodeo Valley stables has changed to accommodate NPS Park Horse Patrol, increase the footprint of the Hay storage shed or container, relocate manure to a shed south of the East Motor Vehicle Shed, add a maximum 60

foot diameter lunging ring –option to be covered- at the upper ledge west of the Balloon Hangar, add the Fuel Shed as an option for rebuilding.

### Chapter 3, Section 3.8 Visitor Experience

[p3-52] **Golden Gate Dairy Stables.** ...Currently, there are no formal public programs at the Golden Gate Dairy stables but the public is offered overnight, short-term “horse hotel” accommodations for up to four visiting horses and allowed to tie-up horses short-term.

#### 3.11.1 Park Staff and Programs

[p3-60]

All stable sites provide visitor services such as information and toilet facilities, if requested. Site-specific programs at the stables are described below:

**Golden Gate Dairy Stables.** ...the public is allowed to tie-up horses short-term. Overnight, short-term “horse hotel” accommodations for up to four visiting horses are offered.

### Chapter 4, Transportation, page 4-118

Under all alternatives, parking at the Golden Gate Dairy site will continue to be impacted by volunteer firemen’s cars at fire station events or meetings as long as the volunteer fire department remains at the site. None of the alternatives will increase parking demands at the site; therefore, the impact on parking demands at the Golden Gate Dairy will be negligible. A short term parking space will be designated at Golden Gate Dairy stables to allow visitors to stop for a short period to interact with the horses at Golden Gate Dairy stables.

#### Chapter 4, Visitor Experience, page 4-113; Paragraph 1

A short term parking space will be designated at Golden Gate Dairy stables to allow visitors to stop for a short period to interact with the horses at Golden Gate Dairy stables..

#### **Rodeo Valley Balloon Hangar - Overview**

The NPS has determined to use the Balloon Hangar as described in Alternative D (see FONSI – Selected Alternative); NPS maintenance operations will be in the Balloon Hangar and will utilize adjacent parking. The Balloon Hangar will be closed until repaired. It will not be included in a future lease but will become a NPS facility. In accordance with the “Common to All” actions described in the Plan/EA, the Balloon Hangar will be rehabilitated for use. See **Chapter 2, Elements Common to All Action Alternatives (B through D), page 2-12; Table 2-6.** Following the Table 2-6 list are the appropriate sections of the EA that are changed based on the Balloon Hangar rehabilitation actions.

The NPS has obtained additional pre-design information on the activities necessary to rehabilitate the Balloon Hangar. Actions will include grading and drainage around the building, and replacement of portions of the structure and cladding. Based on these proposed actions, additions to the EA text are as

**Table 2-6. Proposed Facility Changes Common to All Action Alternatives**

1 The Proposed work at the Balloon Hangar consists of the following:

- Clear vegetation surrounding the building and install drainage system.
- Replace missing interior diagonal bracing and panel straps and adjust interior sag rods.
- Replace missing building cladding on exterior of building envelope.
- Remove and replace deteriorated asbestos cladding, panels.
- Achieve full abatement of vinyl flooring
- Sandblast lead paint and corroded steel and recoat (interior repairs).
- Remediate contaminated soils
- Clear vegetation with 20-feet of the structure, pruning tree canopy encroaching on building
- Site clearing and grading to incorporate vegetated drainage swales along eastern and western edges of building; daylight to existing drainage swales.
- Where possible, maintain “level” buffer around building.
- Install sub drain system for saturated ground along sides of building.

**Chapter 3, Soils, Rodeo Valley Stables, page 3-8**

Preliminary testing of the soils both inside and adjacent to the Balloon Hangar show the soil contains concentrations of lead above established thresholds that require environmental remediation. The source of the lead-contamination is from the lead paint and coatings on the hangar skin. Similarly, there is asbestos contamination in the soils from the building cladding and panels.

**Chapter 4, Geology and Soils, page 4-21, paragraph 8**

**Rodeo Valley.** The soil contamination associated with the Balloon Hangar will require removing contaminated soil and replacing it with similar grade soils. Additional investigation will determine the extent to which contaminated soils would be removed.

**Chapter 4, Water Resources, page 4-37, after paragraph 6**

Facility Construction.

**Rodeo Valley.** The Balloon Hangar is located in the bottom of a valley bottom and is subjected to seasonal flooding. The rehabilitation of the Balloon Hangar would require the construction of a drainage system around the perimeter of the Balloon Hangar in order to alleviate flooding. The addition of foundations and foundation drainage may lower the water table in the immediate area. An Army era landfill is located above the Balloon Hangar and may be affecting water quality. Testing would need to be done to ensure the drainage system does not concentrate contaminated water. Loss of wetland would require NPS to compensate for this loss, as NPS has a no net loss of wetlands policy (2006 Management Policies). Loss of wetlands would also require regulatory permitting by the U.S. Army Corps of Engineers and the State of California Regional Water Quality Control Board under the Clean Water Act.

**Chapter 4, Water Resources, Section 4.4.8, page 4-42**

**WR-7:** Water testing will be done for groundwater adjacent to Balloon Hangar to determine if water is contaminated. If contaminated water is present, project design will minimize concentrating contaminated water.

**Chapter 4, Vegetation, Section 4.5.7, page 4-48**

**Facility Construction.**

The Balloon Hangar structure is surrounded by wetland soils and wetland and riparian vegetation. Most of the trees are rooted greater than 10 feet from the Balloon Hangar. One willow tree (15" dbh) on the west side, and a California laurel (Bay), would need to be removed because of the remediation and drainage activities. On the South side there is a dense canopy of willow and bay trees that would have to be trimmed. The addition of foundations and foundation drainage at the Balloon Hangar may lower the water table in the immediate area. This could have the effect of drying wetland soils and changing the type of vegetation that could grow at the site. The construction design of the foundation and drainage has not been finalized, and could include drainrock filled trenches, and underground retaining walls that possibly could hold groundwater at its current elevation and minimize the effects a lower water table may have on wetland vegetation.

#### **Chapter 4, Vegetation, Section 4.5.8, Mitigation Measures**

Veg - 3: Design of the drainage system for the Balloon Hangar will consider ways to minimize lowering local groundwater levels, including, but not limited to use of underground retaining walls.

#### **Chapter 4, Wildlife, Section 4.6.7, page 4-57**

##### **Facility Construction**

Balloon Hangar. The California red-legged frog could occur in the wetlands adjacent to the Balloon Hangar. The quality and size of the wetland near the hangar is considered suitable to support foraging frogs. Balloon Hangar rehabilitation actions that effect suitable habitat of the California red-legged would require measures to minimize impacts as directed by consultation with the USFWS.

### **NPS RESPONSE TO PUBLIC COMMENTS**

#### **Comment Period and Numbers of Comments Received**

The public comment and review period for the Plan and EA occurred from November 1 through December 16, 2011. 242 letters were received including three from government agencies, the three NPS Marin private stables operators, 10 organizations and 207 unaffiliated individuals. The unaffiliated individuals included people who ride or board at the four project stables. Of the 242 letters, 93 explicitly expressed support for the Plan and EA, and of those, 55 requested certain modifications to the site plans. Summarized comments and responses follow below. Three comments were received from the government agencies including the Natural Resources Conservation Service (NRCS), California Coastal Commission, and the Muir Beach Community Services District. Eleven comments were received from fourteen additional organizations.

#### **Comments Outside of Project Scope**

Twenty-four comments were received about issues that were outside the scope of the project including opposition to helicopter flyovers, support for off-leash dog visitation, ideas for equestrian and hiking trails outside of the project areas, for equestrian bridges to protect horses and salmon, and for safe highway crossings outside of the project areas.

#### **General Summary of the Comments**

The comment positions were varied, ranging from those that were opposed to any and all equestrian uses in the Park to those that supported the expansion of equestrian uses throughout the Park lands.



Commenters described the positive value of horses for human interaction, and as an alternative and sustainable mode of transportation. Horse physical and mental health and well-being were advocated. Certain comments supported removing the military requirements for joining the current stables organization at Rodeo Valley. The value of horses and of the Park Horse Patrol for public safety was discussed; “The close proximity of urban and suburban areas to rugged rural areas means that all the GGNRA stables should be considered as important resource for public safety and emergency response.”

A number of comments expressed strong support for cleaning horse feces from trails as part of the Best Management Practices, to protect natural resources and enhance visitor experience. For example, a comment states, “Horses on trails must be equipped with feces and urine catchment bags, or the riders required to carry trench shovels and bags to collect their animal’s waste for proper disposal, as dog owners are required to do.” Other comments supported protecting trails in wet conditions; “To reduce severe damage, horses should not be allowed on wet trails.”

The majority of comments were generally supportive of the current stables operations at Tennessee Valley (64), Golden Gate Dairy stables (152), and Rodeo Valley (7). A number of comments supported keeping the Park Horse Patrol stables at Lower Tennessee Valley (23). One commenter expressed support for constructing stables at Lower Redwood Creek. Seventeen comments discussed the proposed Business Plan and expressed support for keeping the existing management of the stables. Other comments provided general support for keeping the stables and provided specific comments for stables management or design.

#### **NPS Responses to Comments; Comments of Unaffiliated Individuals:**

**Comments expressed support for the No Action Alternative, stating a preference to “leave the facilities the way they are.” Some comments stated opposition to the Preferred Alternative due to the cost of upgrading the facilities and the loss of recently improved facilities.**

*Response: The No Action alternative does not support the purpose and need of the project. It does not provide facilities that the Park has determined are required at each site, and leaves both historic and non-historic facilities in a dilapidated condition and in need of repair or upgrade. The costs to upgrade the facilities at the stables will be substantial. However, safety and environmental concerns, and the need to protect historic and natural resources require that the sites be rehabilitated to safe conditions that protect the resources. With the Selected Alternative the National Park Service will require needed facility upgrades, removals and addition, as described in Chapters 1 and 2. NPS will work with the future lessees to keep costs down where possible.*

**Individuals expressed support for keeping the existing management of the stables.**

*Response: The National Park Service must, by law, provide leasing and business opportunities to the public. The existing management groups will be notified of the opportunity to respond to the future NPS requests for proposals for stables operation in open competition with other members of the public.*

**Commenters supported keeping the NPS Park Horse Patrol program and horses at the current site in Lower Tennessee Valley (LTV). Reasons stated were that the PHP has functioned well there, that the PHP members prefer to stay at the LTV location, the previous investment in barn repair, and the value of seeing the horses. These viewpoints are summarized in the following comment, “Public Money Wasted: The stables the VPHP are already in, are lovely and it is my understanding that those who are involved there, are settled, like it and don’t want to move. A lot of public money was also put into those facilities rather recently and in these hard economic times, it will be a waste**

**of resources...The horse facilities are actually a point of interest and a lovely reminder of the old dairy farm. It is a beautiful thing to see the VPHP horses grazing there."**

*Response: The National Park Service determined to relocate Park Horse Patrol from Lower Tennessee Valley and remove horse facilities at that location due to environmental issues and conformance with ongoing planning that will result in revisions to the Park's General Management Plan ( the GMP). The Draft GMP has determined that the horse stables and all other facilities will be removed from the site, and that the natural resources of the area will be enhanced by the restoration of vegetation and habitat. The Marin Equestrian Stables Plan additionally analyzed and supports this Draft GMP proposed action by relocating the PHP operations to another site. The current location at the old dairy farm at LTV has been determined as not eligible for the National Register of Historic Places. Horses will continue to be seen on trails in the Lower Tennessee Valley.*

*Park Horse Patrol will lose the use of the Barn and facilities at LTV. Concerning the loss of recently improved stall facilities - the LTV site would require additional, substantial renovation and improvements to add and upgrade facilities to create the safe, functional stables at LTV as shown in Alternative B1. The costs to upgrade the facilities at the stables at a different site will also be substantial. Golden Gate Dairy, Tennessee Valley and Rodeo Valley sites are all eligible for the National Historic Register. NPS policy promotes viable business opportunities at the historic sites as an effective method of preserving and maintaining the historic features and landscapes. NPS will utilize the capital and maintenance investments via the leases to preserve and rehabilitate these important historic sites. The PHP will be able to access popular trails including those in Tennessee Valley from the new location at Rodeo Valley.*

**Comments expressed opposition to moving the Park Horse Patrol to Tennessee Valley stables. Reasons included visitor and operational conflicts, congestion, horse well-being, and safety concerns summarized by the following comment, " The Park Ranger program and the Miwok public riding program both provide valuable equestrian opportunities and services to users of the GGNRA, but they serve different needs. Trying to combine the two operations into a single facility will create overcrowding and will be destructive to both programs."**

*NPS Response: Tennessee Valley stable currently has the largest number of horses at a GGNRA Marin stables sites with 42 horses in the winter and 52 in the summer, making Tennessee Valley stables (TV) the busiest site. As the busiest site, the programming, operations, and business opportunity would be most impacted by operating on a shared site. Although with the future leasing opportunity the operations at TV may change, keeping the maximum number of horses at TV the same and not adding four additional PHP horses will allow greater flexibility for the future operator. Additionally, placing the PHP program horses at a less busy site could provide greater site planning and operational flexibility for the NPS program. The National Park Service has amended the Selected Alternative to allow relocation of these facilities to Rodeo Valley stables.*

**Comments supported Alternative B, Option B2 as described in the EA. A number of comments expressed appreciation for the visitor experience, the value of the history and of cultural resources at the sites, and many supported rehabilitation of historic sites and buildings. Others supported this alternative while proposing site plan changes within the stables sites. For Golden Gate Dairy; "Upgrading the stalls to blend historically would be acceptable, but moving them would not."; "One of the ways would be to relocate one of the rows of new stalls and paddocks so that it would be situated along the northwest side of the ...turn-out". Tennessee Valley; "Many of these women are in the midst of breast cancer treatments and would certainly benefit from a warm dry room for their meetings."; "...the Red Barn could be made into a walk-thru museum like the one at the Morgan Horse Ranch at the Point Reyes Visitor Center." Comments expressed support for covered horse exercise rings and an overnight caretaker facility at each stables location. Site plan changes**

**or suggestions included turn-out locations, hay barn size, food storage, and stall and paddock locations. For example, one commenter stated, "Large hay storage facility is "Best Practice" for horse health. Buying hay in large quantities ensures quality and consistency of product."**

*Response: NPS determined that existing facilities will be upgraded and that new facilities will be added to stables sites as necessary for the protection of cultural and natural resources, for human and animal safety, and for improving operations. The site plans are conceptual allowing some site planning flexibility: As described in the section "Chapter 2 Common to All, page 2-11 "Facilities, Sanitation, and Safety":*

Facilities. *The information presented in the action alternatives is based on conceptual site plans and designs. Alternatives are based upon an understanding of the likely programmatic requirements of an equestrian operation at each site. Specific sizes, dimensions, areas and layouts are estimates that will be refined during the design and development, as part of a long-term lease arrangement with an operator. If any future changes proposed during the design process are inconsistent with the intent or require further analysis to determine potential environmental effects, additional environmental analysis will be conducted as appropriate and this NEPA document could be amended.*

Cultural Resources. *For all action alternatives, specific maintenance and capital improvements will include actions designed to protect or enhance cultural resources in accordance with the NPS guidelines. The intent under all alternatives is to preserve the historic landscape and historic core areas to the greatest extent possible while protecting water quality by removing all non-historic facilities from the stream buffer zones. Certain non-historic features in the historic core areas will also be removed unless they are needed for stables operations (e.g., paddocks or turn-outs). Those modern equestrian facilities that must remain in the historic core area will be designed to blend appropriately with historic features.*

**Some comments expressed opposition to the rehabilitation of historic sites and buildings. "I think it would be unwise to change this configuration to some historical ideal that no longer has any meaning to the public."**

*Response: Protection of historic resources, including historic structures, archeological resources, and cultural landscapes, is required by the National Historic Preservation Act and is a primary component of the mission of the National Park Service. Therefore, NPS is committed to protecting these resources. NPS policy promotes viable business opportunities at the historic sites as an effective method of preserving and maintaining the historic features and landscapes.*

**Some comments expressed opposition to relocating stalls and horses behind the barn at Golden Gate Dairy. A number of individuals expressed appreciation for the visibility of horses which add to the rural scene at Golden Gate Dairy and at Lower Tennessee Valley stables. Many comments about Golden Gate Dairy expressed support that children, in particular, value seeing and taking part in the horse experience and that the horse-viewing opportunity should continue.**

*Response: At Golden Gate Dairy, horses will remain in public view in the front turnout area and paddocks near the highway frontage of the site. The removal of five enclosed stalls in the front central area will enhance the visibility of horses from the nearby highway. The highway frontage, which currently has no safe shoulder, will be developed as a multi-use trail segment. This trail segment will increase the number of visitors and passers-by and provide increased access to safely view the horses while on foot, bicycle or horse. A short-term parking space will be designated to allow visitors, including*

*those with children, to visit to interact with the horses at Golden Gate Dairy. The future lessee may provide children's program(s) for horse riding at this site in recognition of the multiple comments stating that this is a key factor and benefit of this stable.*

**Commenters did not support isolating a single horse in the front turn-out at Golden Gate Dairy.**

*Response: The future operator will have the flexibility to locate horses within the site. At Golden Gate Dairy stables horses can remain in view of each other in the front turnout area with cross-fencing to create or maintain paddocks at the north end of the turn-out. The removal of front enclosed stall structures in the front central area will enhance the ability for horses to see each other and interact.*

## **NPS Responses to Comments; Agency Comments**

**A letter from the California Coastal Commission stated the project must comply with the federal consistency determination process. A letter from the U.S. Fish and Wildlife Service noted that consultation must occur with USFWS and NOAA Marine Fisheries Service for impacts to federally listed plant and animal species.**

*Response: Consultation was completed.*

**Muir Beach Community Services District expressed support for Alternative B, Option B2 as the Selected Alternative but requested that horses remain as visible to the public as possible at Golden Gate Dairy. The group suggested the Park take into consideration the upcoming move of the Muir Beach Volunteer Fire Department which may present an opportunity concerning the horse arena.**

*Response: As noted above, the future operator will have flexibility to locate horses within the site. At Golden Gate Dairy horses can remain in public view in the front turnout and paddocks along the highway frontage of the site. The highway frontage, which currently has no safe shoulder, will be developed as a multiuse trail segment. This trail segment will increase the number of visitors and passersby, and provide access to safely view the horses while on foot, bicycle or horse. A short-term parking space will be designated for visitors in vehicles to stop and interact with the horses. The Creamery building is currently occupied by the Muir Beach Volunteer Fire Department. The future use of the Creamery building, for stables or other use will be determined prior to NPS offering the leasing/business opportunity to the public. If included as an option to the stables lessee, the building could be used as a garage, storage, stalls, or meeting space.*

**A letter from the USDA Natural Resource Conservation Service (NRCS) provided agency standards for Best Management Practices (BMPs) including specific categories and NRCS BMPs for equestrian facilities.**

*Response: NPS will review the stables and manure management BMPs referenced in the letter from NRCS and will likely adopt the appropriate measures into Marin stables management.*

## **NPS Responses to Comments; Organization Comments**

**Four comments were received from representatives of the Marin Horse Council. Several stated a preference for Alternative B1 and for upgrading existing facilities. Comments expressed opposition to moving the Park Horse Patrol to the Tennessee Valley stables. Some individuals expressed support for keeping horses where they can be viewed by the public at Golden Gate Dairy stables. One of these letters expressed specific support for the current lessee at Golden Gate Dairy while**

**another expressed support for Alternative B, Option B2 with certain revisions including increasing square footage for arenas and storage space for hay bales. One letter expressed support for continuing the long-term operation of the stables and public outreach programs in the park.**

*Response: NPS determined that existing facilities will be upgraded or relocated and that new facilities will be added to stables sites as necessary for the protection of cultural and natural resources, for human and animal safety and to improve operations. The Selected Alternative described in these Errata will be adds certain elements found in Alternative B, Option B1, C and D. These include not locating the Park Horse Patrol at Tennessee Valley, NPS use of the Balloon Hangar at Rodeo Valley, and the location of a new structure (in this case a covered riding ring) to the west of the Balloon Hangar. The site plan changes to the Selected Alternative are listed on page E17 of these Errata and on Figures E.2-7, E.2-11, and E.2-13.*

*The Selected Alternative is revised to relocate the Park Horse Patrol to Rodeo Valley stables instead of Tennessee Valley, Marincello, Lower Redwood Creek or Golden Gate Dairy. The National Park Service had previously considered and dismissed the idea of relocating Park Horse Patrol to Rodeo Valley stables instead of Tennessee Valley stables. This idea was originally rejected because the Park Horse Patrol has been headquartered at Lower Tennessee Valley for years in an area that is considered centrally located within a popular area of the Park. Based on discussion with management and staff, the National Park Service will relocate Park Horse Patrol facilities to Rodeo Valley stables as the Selected Alternative. After consideration, the National Park Service determined that the Rodeo Valley stables site has access to popular trails, sufficient room for stalls, offices, and support facilities such as hay storage and parking which could service both NPS operations and a stables lessee. The distance to Tennessee Valley Trail from Rodeo Valley stables is approximately three miles; an estimated 45 minute horseback ride. The total number of horses there would remain at nineteen, with a minimum of twelve horses being available to stable to a future lessee. Under this operational change, some of the site planning elements analyzed in Alternatives B; Option B1, C and D may be taken into account at Tennessee Valley and Rodeo Valley. See page E14 and Table 2-8 of these Errata for a list of site changes.*

*At Golden Gate Dairy, horses can remain in the public view in the front turnout and paddocks at the highway frontage of the site. Existing enclosed stalls adjacent to the front turn-out will be relocated out of the front central area to protect the cultural landscape. The Golden Gate Dairy front turn-out can remain approximately the same size by utilizing the adjacent area now comprised of stalls and paddocks.*

**A letter from Marin Conservation League expressed support for the Selected Alternative, Alternative B, Option 2 with certain recommendations. The letter offered support for the stables planning process including the establishment of Best Management Practices and other natural and cultural standards that can be applied as appropriate. This letter offered three recommendations summarized as follows: 1) develop a new facility at Marincello for the Park Horse Patrol, 2) consider the use of horse manure as composting material, and 3) reconsider grazing based on appropriate expertise. 4) The letter also expressed support for upgrading the existing stalls, located in the front central core area at Golden Gate Dairy, to blend architecturally with the historic buildings.**

*Response: 1) The National Park Service analyzed site options and determined not to build new stables at Marincello Road due to the expense of an entirely new facility, providing utilities and paving a road to that site. NPS determined that the Rodeo Valley site has sufficient room for stalls, offices, and support facilities such as hay storage and parking. 2) NPS will possibly consider on-site composting of manure if it could be effectively managed and demonstrated that water quality will not be affected. 3) Reconsideration of grazing: This would be a separate planning process and is not included in the scope of the stables Plan/EA. 4) At Golden Gate Dairy the non-historic front enclosed stall structures will be*

*removed to enhance and preserve the historic open core (central open space) of the Golden Gate Dairy. A detailed response to this issue is provided on page E15 under “Response”.*

**A letter from the president of Alto Bowl Homeowner’s Association offered support for Alternative B, Option 1. The letter disagrees with moving Park Horse Patrol to Tennessee Valley.**

*Response: As stated above, NPS determined that Rodeo Valley has sufficient room for stalls, offices, and support facilities such as hay storage and parking. NPS has determined to locate the PHP at Rodeo Valley, rather than at Tennessee Valley, Lower Tennessee Valley, the Marincello site, Lower Redwood Creek, or Golden Gate Dairy.*

#### **NPS Responses to Comments; Stables Affiliates Comments**

**The non-profit The Miwok Stables Center, the current operator at Tennessee Valley, expressed opposition to Alternative B, Option B2 because it threatens to disrupt the harmony that exists in the management of public programs at the stables. This organization expressed concern about the negative impacts to the physical site and daily operation due to overcrowding and loss of eight paddocks. This letter offers a number of proposed solutions and alternatives concerning stalls, boarding, docent programs, a Red Barn Museum similar to Morgan Horse Ranch and shared use of the Main Residence (the Lopes House). A second letter expressed safety concerns for horses should the Park Horse Patrol relocate to Tennessee Valley.**

*Response: The National Park Service has determined to not locate the Park Horse Patrol program at the Tennessee Valley stables site. Of the Marin GGNRA stables analyzed in this EA, Tennessee Valley has the greatest number of horses and improved facilities. With 42 horses in the winter and 52 in the summer, TV is expected to remain the busiest of the sites. As the busiest site, the programming, operations, and business opportunity would be most impacted by two programs operating on a shared site. Although with the future leasing opportunity the operations at Tennessee Valley may change, it is likely any future operator will maximize the number of horses at the site. NPS concludes that not adding four additional horses will allow greater space and operational flexibility for the future operator. Additionally, placing NPS Park Horse Patrol program horses at a different site would provide greater site planning and operational flexibility for that NPS program. The National Park Service has amended the Selected Alternative to relocate the Park Horse Patrol program to the Rodeo Valley stables. Rodeo Valley would continue to have the potential for a lessee to carry out a public horse program at the site.*

*Site planning and facilities: The use of the Main Residence will be provided as an option to the future lessee. The Red Barn will be included in the leased stables facility, and can be used as storage for feed or equipment, a museum, or for other programming as approved by NPS.*

**Miwok Livery, current program provider at Tennessee Valley, expressed strong opposition to moving the Park Horse Patrol to Tennessee Valley stables due to congestion, logistics, loss of paddock space, parking, turn-out location, water, socioeconomics and unsustainable business planning. Safety was also an issue that was mentioned as a reason not to move the Park Horse Patrol to Tennessee Valley site. The letter discusses problems with site planning such as the manure shed location, hay barn design, new turn-out area, and residence location and it offers some suggestions to improve these issues. This letter recommended not locating the new turnout near the large arena due to disturbing the lesson horses in the large arena:**

*Response: The Selected Alternative has been revised to relocate the Park Horse Patrol to Rodeo Valley instead of Tennessee Valley stables. See the discussion above under the Miwok Stables Center comment, above.*

*Site planning and facilities: NPS determined that existing facilities will be upgraded or relocated and that new facilities will be added to stables sites as necessary for the protection of cultural and natural resources, for human and animal safety and for improving operations. The list of site changes is included on page E-14 of these Errata and in Table 8. The proposed site plan changes can be viewed on Figures E.2-11 and E.2-13. The distance between the new turnout and the existing arenas and lunging ring will be determined with safety in mind. As described in the section "Chapter 2, Common to All, page 2-11 "Facilities, Sanitation, and Safety":*

*Facilities. The information presented in the action alternatives is based on conceptual site plans and designs. Alternatives are based upon an understanding of the likely programmatic requirements of an equestrian operation at each site. Specific sizes, dimensions, areas and layouts are estimates that will be refined during the design and development, as part of a long-term lease arrangement with an operator. If any changes proposed during the design process were inconsistent with the intent and assessed effects of the selected alternative, additional environmental compliance will be conducted as appropriate.*

*Cultural Resources. For all action alternatives, specified major maintenance and capital improvements will include actions designed to protect or enhance cultural resources in accordance with the NPS guidelines. The intent under all alternatives is to preserve the historic landscape and historic core areas to the greatest extent possible while protecting water quality by removing all non-historic facilities from the stream buffer zones. Certain non-historic features in the historic core areas will also be removed unless they are needed for stables operations (e.g., paddocks or turn-outs). Those modern equestrian facilities that must remain in the historic core area will be designed to blend appropriately with historic features.*

**Ocean Riders of Marin, the current operator at Golden Gate Dairy stables, submitted a letter stating support for many aspects of the Selected Alternative B, Option B2. Specific to Golden Gate Dairy, the letter discusses the Best Management Practices currently implemented at the stables and offers a number of site design alternatives including placement of stalls, manure storage, water storage, and horse trailer pads. This letter expressed strong support for keeping horses where they can be viewed by the public, view each other, and for keeping horse stalls in the front central area. Attached to this letter were a number of exhibit drawings providing a visual display of the suggested site design changes.**

*Response: The National Park Service site changes in the Alternatives are based on safety, access and function, and the protection and enhancement of historic and natural resources. As stated above, NPS determined that existing facilities will be upgraded or relocated and that new facilities will be added to stables sites as necessary for the protection of cultural and natural resources, for human and animal safety and for improving operations. Protection of historic resources, including structures and landscapes, is required by the National Historic Preservation Act and is a primary component of the mission of the National Park Service. Therefore NPS is committed to protecting these resources. Golden Gate Dairy's 'historic core' (the front turn-out area) has been determined to be a contributing feature of the historic site, and is described on page 3-50 of the Plan/EA stating:*

*Cultural landscape features that define the character of the ranch include:*

- 1) The building cluster/spatial organization of the main house, the creamery, the sanitary barn, the hay/milking barn, the outhouse and the shed that formed the body of the operational dairy around a core central area garden;*
- 2) Historic circulation features including the internal ranch road, concrete cow path, and the Dias Ridge trail which was used by ranchers to access the steep pasture lands and to move the cows to the barn for milking;*
- 3) Natural systems and features such as the large outcropping of rocks, the stream, and planned landscape features such as the windbreaks of cypress and eucalyptus trees and the kitchen garden;*
- 4) Small scale historic features, including picket fences and split redwood fences; and,*
- 5) Less tangible characteristics, such as the spatial organization and the sense of feeling at the ranch.*

*Together, these features of the historic core area help convey the overall design and function of the ranch and its association with early twentieth century dairy farming on the Marin Peninsula. It is considered critical that the historic core area remain open in order to best convey the historic context of this site. The removal of stalls while allowing the turn-out, paddocks and horses to remain will add to the historic context of the dairy.*

*At Golden Gate Dairy stables, the horses can remain in the public view in the front turnout area and paddocks at the highway frontage of the site. The removal of the stalls in the front central area will enhance the visibility of horses. The highway frontage, which currently has no safe shoulder, will be developed as a multiuse trail segment. This trail segment will increase the number of visitors and passers-by and provide increased access to safely view the horses while on foot, bicycle or horse. A short-term parking space will be designated to allow visitors, including those with children, driving by to park and interact with the horses at Golden Gate Dairy. Further ideas for site design changes will be reviewed once the leasing opportunity proposals are received from the public. Cultural Landscape Reports will assist site planning decisions for the protection of cultural resources.*

**The Presidio Riding Club, the current operator at Rodeo Valley, expressed support for Alternative A, No Action, noting that horses were at capacity with 19 horses plus eight horse hotel stalls – a total of 27 horses. The letter proposed keeping the existing stables layout, locations and use due to the current horse housing with 22 stalls in the East Motor Vehicle Shed. The letter supported the stables continued use and programming of the Balloon Hangar and offered assistance with fundraising for its repair, the large hay and feed storage in the West Motor Vehicle Shed, and outdoor arena space. The letter described the use of the Balloon Hangar by NPS and adjacent parking area to the north as undesirable due to noise, traffic and parking conflicts that will occur. The letter stated that vehicle ingress and egress will negatively impact horses and hikers and that safety will be impacted. Other comments included locating an overnight caretaker at Capehart Housing or providing monitoring, composting toilets and suggested the consideration of moving the Park Horse Patrol program to Rodeo Valley.**

*Response: Based on discussion with management and staff, the National Park Service will relocate Park Horse Patrol facilities to Rodeo Valley stables as the Selected Alternative. The Rodeo Valley site is adjacent to popular trails. The distance to Tennessee Valley Trail from Rodeo Valley stables is approximately three miles; an estimated 45 minute horseback ride.*

*After consideration, the National Park Service determined that the Rodeo Valley stables site has sufficient room for stalls, offices, and support facilities such as hay storage and parking at the site which could*



*service both NPS operations and a stables lessee. The total number of horses there would remain at nineteen, with a minimum of twelve horses for a future lessee. NPS will control the site and make certain investments that will be described in the future leasing opportunity which may be part of a larger RFP that includes the operation of other GGNRA Marin stables sites. Under this operational change, some of the site planning elements analyzed in Alternatives B; Option 1, C and D may be taken into account at Rodeo Valley. See page E-14 of these Errata for a list of site changes.*

*The revised site plan will provide an additional office within the West Motor Vehicle Shed, along with a potential residential unit there. These errata describe a new manure shed, an option for a covered ring, and optional relocation of hay storage or residence for ease of access and fire separation. The Balloon Hangar would be closed until repaired and would not be included in a future lease but would become a long-term NPS facility.*

*NPS use of the Balloon Hangar: Noise and traffic are anticipated during the rehabilitation and repair. NPS will work with future stables operators to reduce disturbance of horses. The ledge to the west of the Balloon Hangar could be developed as a horse ring that could be covered. Per the Plan/EA, an overnight caretaker would be required unless an operator can provide an acceptable alternative for equestrian safety and monitoring. If permanent horses displace visiting horses in the current “horse hotel” stalls in the East Motor Vehicle Shed, visiting horses may stay outside in paddocks per the language in the Plan/EA.*



Golden Gate Dairy  
Alternative B, Options B1 & B2

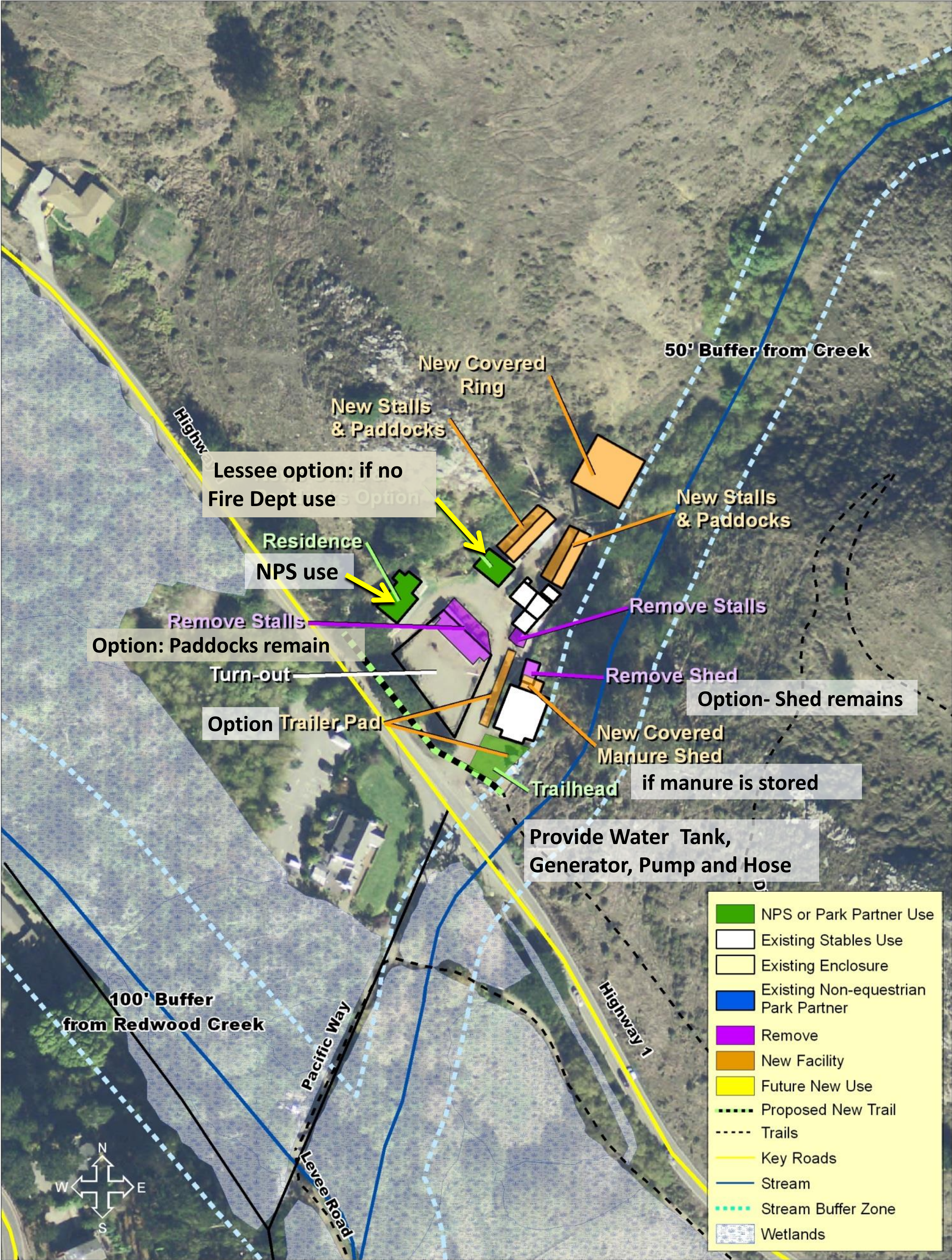


Figure 2-7 Alternative B - (Option B1) and (Option B2, Final Preferred) - Golden Gate Dairy

Errata [black text] August 2013



Tennessee Valley Stables  
Alternative B, Option B2

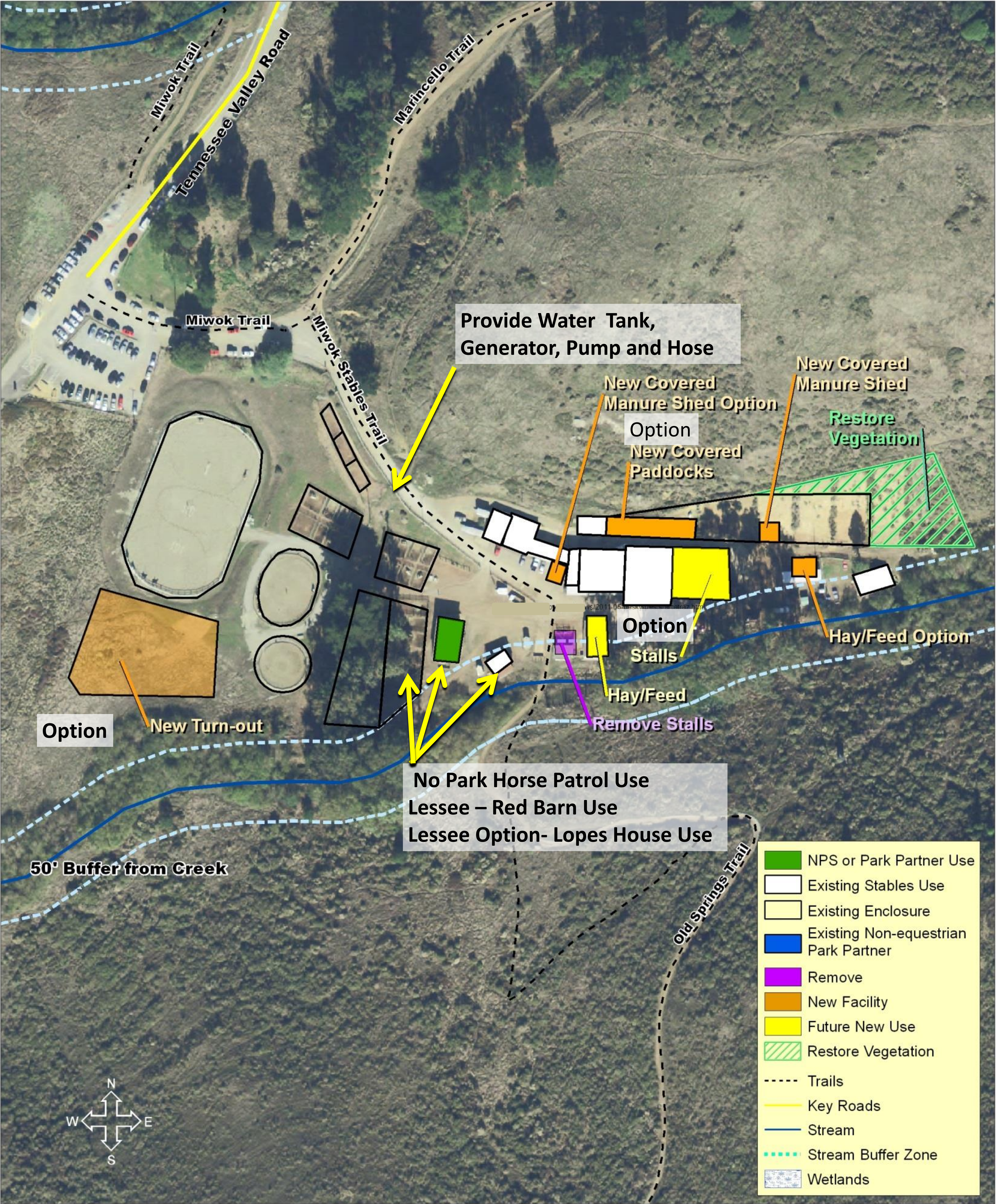


Figure 2-11 Alternative B - (Option B2) - Tennessee Valley (Final Preferred)

Errata [Black text] August 2013



# Lower Tennessee Valley Alternatives B, Option B2, C and D



Errata [black text] August 2013



Rodeo Valley Stables  
Alternative B, Option B2

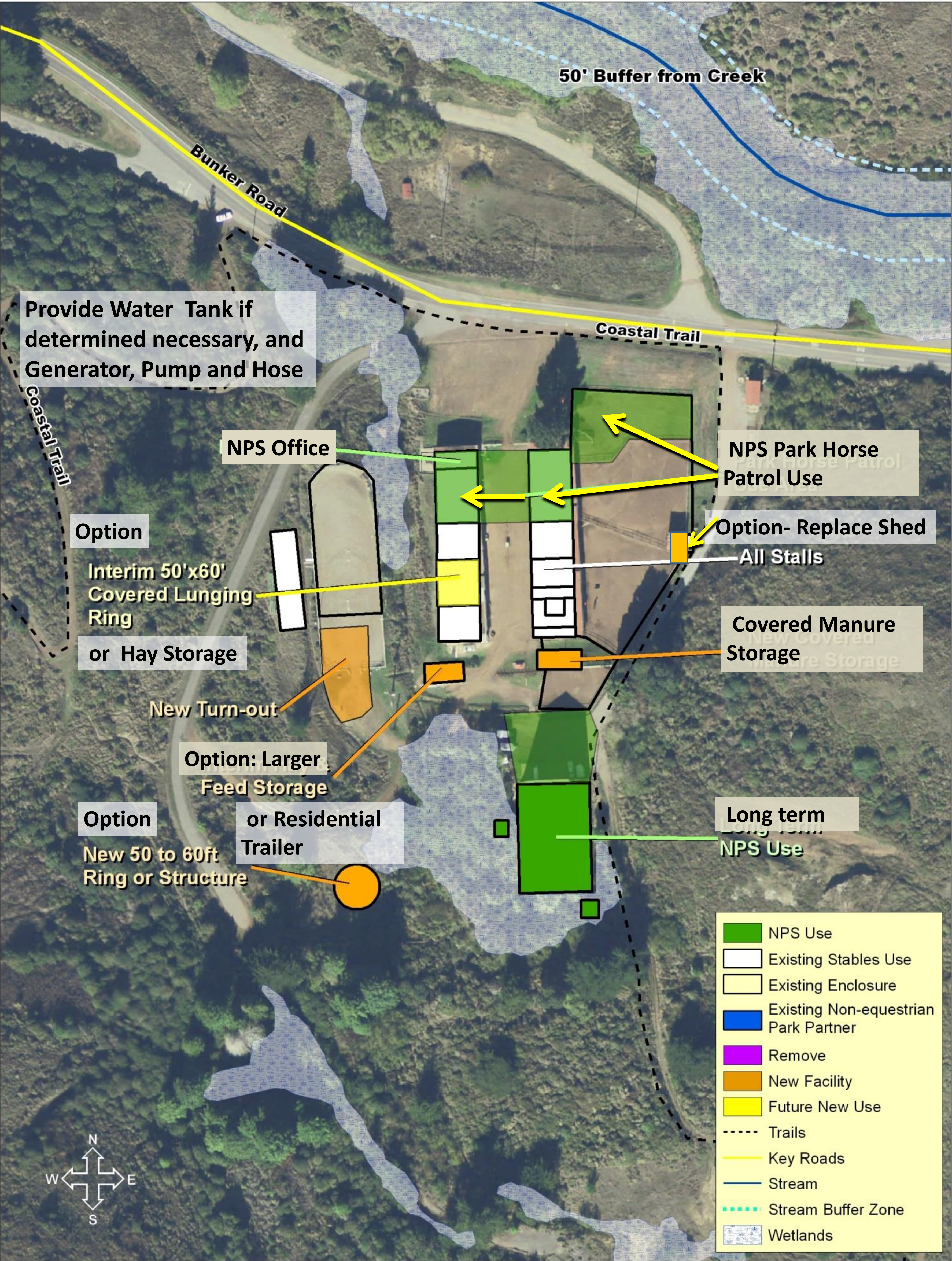


Figure 2-13 Alternative B - (Option B2) - Rodeo Valley (Final Preferred)

Errata [Black text]

August 2013