

Gaviota Coast Feasibility Study & Environmental Assessment

Errata and Summary of Public Comments and Responses

February 2004

This *Errata and Summary of Public Comments and Responses* report provides minor factual corrections, additions and revisions to the *Gaviota Coast Draft Feasibility Study and Environmental Assessment*, dated April 2003. Only the changes to the *Gaviota Coast Draft Feasibility Study and Environmental Assessment*, and references to the page number where the change has occurred are provided. The reader must have access to a copy of the *Gaviota Coast Draft Feasibility Study and Environmental Assessment* in order to fully understand the changes. This document also provides responses to comments received on the draft study report during the public comment period.

Additional copies of this document and the April 2003 draft report can be downloaded from the internet at www.nps.gov/pwro/gaviota. Printed copies are also available upon request at the address below, ATTN: Gaviota Coast Feasibility Study, or at PGSO_Gaviota@nps.gov.

Publication and distribution of this *Errata and Summary of Public Comment and Responses* report concludes the environmental impact analysis process for the Gaviota Coast Feasibility Study. This document and the April 2003 *Gaviota Coast Draft Feasibility Study and Environmental Assessment*, combined, constitute the final report of the Gaviota Coast Feasibility Study process. This final report package was transmitted to Congress on March 5, 2004.

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I. Introduction

ABOUT THIS DOCUMENT

The following document includes: 1) errata sheets that correct and add factual information to the April 2003 *Gaviota Coast Draft Feasibility Study and Environmental Assessment* (draft study report); and 2) a summary of comments raised by the public, with responses to those comments from the NPS. In accordance with the National Environmental Policy Act and NPS policies, the combination of this document and the draft study report constitute the Final Gaviota Coast Feasibility Study and Environmental Assessment that has been transmitted to Congress.

BACKGROUND

The NPS prepared the April 2003 *Gaviota Coast Draft Feasibility Study and Environmental Assessment* to determine whether all or part of the Gaviota Coast study area is suitable and feasible for designation as a unit of the National Park System. Congress authorized this study in 1999 in response to local interest. The study area covers a 76-mile stretch of coastal watersheds in Santa Barbara County, from Coal Oil Point to Point Sal, including all of Vandenberg Air Force Base.

Through the feasibility study process, the NPS made the following determinations about the Gaviota Coast study area:

- The natural and cultural resources of the area are **nationally significant**, meeting all four of the NPS criteria for national significance.
- The area is **suitable for inclusion** in the National Park System, as it represents natural and cultural resource types that are not already adequately represented in the System or protected by another land managing entity.
- The area is **not a feasible addition** to the National Park System because sufficient land is not currently available to the NPS; strong opposition from study area landowners makes it unlikely that effective NPS management could occur; and the NPS is not able to undertake new management responsibilities of this cost and magnitude, given current national financial priorities.
- While NPS management, if feasible, could contribute to the conservation of the area's resources, **management by organizations other than NPS is recommended.**

Two alternatives that do not include NPS management were considered feasible and are evaluated in an Environmental Assessment:

- Alternative 1: Continuation of Current Programs and Policies. This is the "no action" alternative for this study, and assumes that current programs, policies, conditions and trends would continue.
- Alternative 2: Enhanced Local and State Management. This alternative provides a menu of programs and tools that could be pursued by the local community.

The NPS prepared an Environmental Assessment to identify and analyze the potential environmental and socioeconomic consequences of each of the alternatives. Alternative 2 is identified as the "environmentally preferred" alternative because it would increase the local capacity for permanent land conservation, effective management of significant natural and cultural resources, and public understanding of the significance of the area.

The NPS did not identify a “preferred alternative” at the time the draft study was released because the actions identified in each alternative are local, state and private actions, not NPS actions. The NPS has chosen not to identify a preferred alternative in the final report because there is no NPS action under either alternative.—

PUBLIC COMMENT PERIOD

A 90-day public comment period, which ended on July 18, 2003, followed the release of the draft study in April 2003. Reports were made available via the NPS website, on CD-ROM, and in printed format. Executive summaries of the report were sent to all of the approximately 3,000 individuals on the NPS mailing list for the study. Approximately 450 printed copies and 200 CD-ROMs of the full draft study report were sent to individuals on the mailing list who requested such. Several hundred copies were also distributed at public meetings held in the local community in May of 2003. Additional copies were distributed upon request.

As of September 2003, approximately 1,600 letters comprising roughly 6,800 pages of comments were submitted to the NPS. They include approximately 400 individual letters and comment forms as well as 1,200 copies of 5 different form letters. The comments include both opinions and substantive¹ comments related to both the study process and the draft study report.

Comments were received from many sectors of the community including: individual citizens, Native American groups, landowners, elected officials, farm bureaus, environmental organizations, and other non-profit organizations (local, state and national) including non-profit public interest law foundations.

The letters indicate a highly polarized response to the study findings. Most of the comments submitted conveyed support or agreement for Alternative 1, Alternative 2, or requests for the NPS to analyze additional alternatives with NPS management before submitting the final report to Congress. Similar numbers of commenters advocated for Alternative 1 (approximately 665 comments) and for Alternative 2 (approximately 775 comments). The remaining commenters did not indicate a clear preference. In addition, a substantial number of comments were submitted expressing agreement or disagreement with the feasibility findings and the analysis in the Environmental Assessment.

PUBLIC COMMENTS AND RESPONSES

The study team reviewed all e-mails, letters, faxes, and other documents submitted during the 90-day comment period. Comments were organized and analyzed according to the sections of the draft study report and other topic areas that proved to be a particular area of concern in the public comments. The comments were coded by topic and entered into a database. The NPS study team grouped similar comments before providing the NPS response.

All comments are treated equally. The analytical process makes no attempt to treat comments as votes, nor does it attempt to sway decision-makers towards the will of any majority. Emphasis is on the content of the comment rather than the number of people who agree with it. This type of content analysis ensures that every comment is considered in the decision process.

A summary of comments and NPS responses is provided at the end of this document. The comment analysis and response summary is divided into topics that primarily relate to sections in the draft study. This includes study process, resource description, significance, suitability, feasibility, alternatives and environmental assessment, and illustrations and references. To fully represent concerns raised by public comments, additional topical areas have been added to group similar comments.

¹ NPS management policies define substantive comments as those that do one or more of the following:

1. question, with reasonable basis, the accuracy of information in the EIS/EA
2. question, with reasonable basis, the adequacy of the environmental analysis
3. present reasonable alternatives other than those presented in the EIS/EA
4. cause changes or revisions in the proposal

ERRATA

NPS policies state that if commenters correct or add factual information that has no bearing on the determination of significant impact, the information should be added to the text of the Environmental Assessment when possible. The NPS did not identify any changes that would result in the determination of significant impacts.

Comments included suggestions for new NPS management alternatives or some other NPS designation. The NPS did not find the suggested NPS management alternatives feasible, therefore the final report does not include any further analysis of additional alternatives.

If no new information or analysis is added to the report that would increase the degree of impact, then the NPS may incorporate that information through use of errata sheets. The errata sheets in this document reflect corrections and changes to factual information. The combination of the draft feasibility study and environmental assessment, and errata sheets constitute the final report that will be transmitted to Congress.

Changes to the draft study report primarily include: 1) editorial or factual corrections; 2) further explanation of programs in the alternatives; and 3) additional text to clarify several misunderstandings regarding the draft study. Misunderstandings that were repeated throughout the public comments include:

- **Concerns regarding NPS or federal involvement and/or new federal regulation of private lands under Alternative 2.** Many comments expressed fear and concern regarding NPS management or additional federal regulations that would be imposed on the study area under Alternative 2. It should be noted that there are no alternatives presented that include additional National Park Service involvement or federal regulations. Under Alternative 2, the NPS would take no action in the study area beyond those actions already authorized; thus, the NPS role is the same in Alternative 2 as in Alternative 1. Alternative 2 provides no mandate on the local community. Implementation of the programs and policies described is completely voluntary.
- **Concerns regarding the static nature of Alternative 1.** A number of comments expressed concern about the static nature of Alternative 1, the "no action" alternative. These comments fell into two groups: 1) those stating that the NPS erred in assuming that existing programs and policies would not change to reflect additional conservation needs, and 2) those stating that due to budget shortfalls and deficits, it is not possible for existing programs and policies to continue at their current levels.

The "no action" alternative is required by the National Environmental Policy Act. It serves to set a baseline of existing impacts continued into the future to compare impacts of action alternatives. The Council on Environmental Quality guidelines states that "'no action' is 'no change' from current management direction of level of management intensity," and "the 'no action' alternative may be thought of in terms of continuing with the present course of action until that action is changed (Federal Register, v. 46, no. 55, p. 18027, March 23, 1981)."

- **Concerns regarding adequacy of the environmental review.** Comments suggested a range of additional analysis that should be included in an environmental impact statement. Many of these suggested analyses do not apply because neither alternative includes any additional federal actions. Other reasons for requesting an environmental impact statement were for the analysis of new alternatives that include NPS management. The NPS did not analyze any new alternatives for NPS management since NPS management has been determined to be infeasible.

Many comments were received with concerns that additional public access or recreational facilities that may result from the implementation of Alternative 2 would have impacts on natural, cultural and agricultural resources. Action items identified in the alternatives may require additional environmental analysis before they can be undertaken by the various implementing agencies and organizations. Because the alternatives in the Feasibility Study are conceptual in nature, the analysis of environmental consequences in the Environmental Assessment is necessarily quite general. The study report can only include reasonable projections of likely impacts. Further explanation is included in the public comments and responses section.

II. Errata

INTRODUCTION

The following changes to the April 2003 *Gaviota Coast Draft Feasibility Study and Environmental Assessment* primarily include: 1) editorial or factual corrections; 2) further explanation of programs in the alternatives; and 3) additional text to clarify misconceptions regarding the draft study.

The majority of changes are to Chapter 7, Alternatives. These changes are primarily: 1) clarifications to the definition of Alternative 1 as a baseline, “no action” alternative, 2) clarification on the voluntary nature of programs and tools included in Alternative 2, 3) clarification of the NPS role in the alternatives, and 4) additional information on tools and programs based on concerns raised in the public comments.

Underlined text is added to the draft report, while text struck out is deleted. Other text is provided as context for these changes.

EXECUTIVE SUMMARY ERRATA

Page 6, second column, first paragraph, following the second sentence, revised to add new sentence:

A “no action” alternative under the National Environmental Policy Act (NEPA) is a baseline against which to measure other alternatives, and includes no change from current management direction or level of management intensity (Federal Register, v. 46, no. 55, p. 18027, 3/23/1981).

Page 10, first column, following the first paragraph, revised to add new sentence:

Under Alternative 2, current agricultural land would remain in agricultural use as long as landowners are willing and able to continue this use of the land. The programs and tools presented in Alternative 2 are focused substantially on assistance to private landowners, and mechanisms to conserve resources when agriculture is discontinued for economic or personal reasons.

Page 10, second column, following the first paragraph, revised to add new sentence:

These actions would be entirely voluntary on the part of the landowners.

Page 11, first column 1, first paragraph, revised to include new first sentence:

The Gaviota Coast’s active ranching and farm lands are an essential part of the area’s scenic and cultural identity, and provide open space and wildlife habitat benefits, in addition to local food production.

Page 11, first column, first paragraph under section titled, *Regulatory and Incentive Programs*, revised to add text after first sentence: These programs would be developed at the discretion of and under the direction of local government and local voters. Further consideration of the costs and benefits of these programs would be a part of the public decision process.

Page 11, second column, first paragraph, first sentence, revised as follows:

A regional open space district could be established to provide an additional funding source for acquiring land and conservation or agricultural easements in the Gaviota Coast area.

Page 12, first column, first paragraph under section titled, *Public Land Management and Access*, following the second sentence, revised to add sentence:

These decisions should be made locally, with community involvement.

Page 12, first column, first paragraph under section titled, *Public Land Management and Access*, 4th sentence, revised as follows:

“Working with willing sellers or willing landowners, such a conservancy could...”

Page 12, first column, last paragraph, following the third sentence revised to add text:
Any designation of significant sites would be entirely voluntary.

Page 12, first column, last paragraph, last sentence that ends in the second column, revised as follows:

These organizations and others could continue to work with landowners and managers to protect sacred sites and archeological resources, and to ~~obtain~~ seek access or ownership of important sites for ceremonial, interpretive and educational purposes.

Page 12, second column, first complete paragraph, first sentence, revised as follows:

The county could work to create connector trails from the coastal trail up the canyons to significant viewpoints or to the Los Padres National Forest in several locations where landownership patterns allow.

Page 12, second column, first paragraph complete paragraph, beginning with the second sentence, revised as follows:

Trail planning and development should be done in cooperation and consultation with landowners in accordance with current county policies, and should avoid areas where privacy and agricultural operations would be negatively impacted. Trails should be sited in areas that would not cause significant impacts to natural, cultural or agricultural resources. This can be accomplished through careful design of trail systems and public education efforts. Monitoring programs and adaptive management strategies should be pursued to ensure that trail use does not impact resources once trails are established.

Page 12, second column, third paragraph, first sentence, revised as follows:

Enhanced federal agency involvement with surrounding communities could include the Los Padres National Forest working more closely with local landowners and organizations in voluntary cooperative land management and resource protection, educational and interpretive programs, and public access.

Page 13, second column, second paragraph, revised to acknowledge that the NPS is not identifying a preferred alternative.

The “preferred alternative” is the agency-preferred course of action. The NPS has chosen not to identify a preferred alternative because there is no NPS action under either alternative. ~~The NPS is not required to identify a “preferred alternative” in an EA. The NPS does not have a “preferred alternative” at this time because the actions identified in each alternative are local, state and private actions, not NPS actions. The NPS will identify a “preferred alternative” after analyzing public and agency responses to the draft Feasibility Study.~~

Page 16, Summary Table, third sentence under Recreational Use and Experience, Alternative 1, revised to add text:

Impacts would particularly affect disadvantaged populations that currently do not have adequate access to coastal recreational facilities.

BACK COVER

Change zip code from ~~94702~~ to 94607

DRAFT STUDY REPORT ERRATA

FRONT INSIDE COVER

Change zip code ~~94702~~ to 94607.

RESOURCE DESCRIPTION

Page 8, first column, last paragraph, second sentence, revised as follows:

These include Ocean Beach County Park, Jalama Beach County Park, Santa Barbara Shores ~~County~~ City Park.

Page 9, first column, first paragraph, second sentence, revised as follows:

Although Hollister Ranch is subdivided into approximately 100-acre parcels for residential use, it functions as a cattle ranching cooperative where ~~many~~ most (95%) of the landowners participate in the program by allowing use of their parcels for seasonal grazing.

Page 9, first column, third paragraph, second sentence, revised as follows:

The ~~300~~ 360-room resort provides recreational and conference facilities in a highly scenic coastal location.

Page 22, first column, second paragraph, last sentence, revised as follows:

Within the study area, a critical habitat unit has been designated in the Santa Ynez Mountains between Canada del Cojo and Arroyo ~~Bulito~~ Bulito.

Page 27, second column, new sentence added to the end of paragraph 1:

As a result of the increased requirements for survey and evaluation of archeological sites on federal land, more information is available for sites on Vandenberg AFB. Information about archeological sites on private land can be difficult to obtain because such resources may not be well documented, or information may be withheld from the public to respect the privacy of the landowner.

Page 27, second column, new sentence added to the end of paragraph 3:

As a result of the increased requirements for survey and evaluation of historic sites on federal land, more information is available for sites on Vandenberg AFB. Information about historic sites on private land can be difficult to obtain because such resources may not be well documented, or information may be withheld from the public to respect the privacy of the landowner.

Page 27, second column, first paragraph under section titled, "Prehistoric Inhabitants," delete last two sentences:

~~The Barbareño Chumash were based along the Channel Coast east of Gaviota. The Purisímeno Chumash were based west of Gaviota and north of Point Conception.~~

Page 28, first column, first paragraph last sentence: While the Barbareño and Purisímeno Chumash differed culturally, ~~both groups~~ these ocean-based communities participated in an extensive, long-distance regional-trade system with other ~~Chumash and~~ Native American groups.

Page 39, first column, last paragraph, first sentence, revised as follows:

In the Ellwood area, Santa Barbara Shores ~~County~~ City Park offers ~~no direct~~ limited access to the beach from the bluff top.

Page 41, note 39, revised as follows:

Remove last parenthesis.

FEASIBILITY

Page 68, first column, first paragraph under section titled, *Land Use, Ownership Patterns, Planning and Zoning*, first sentence, revised as follows:

The primary purpose of the base is to support space and missile launch activities, however 67% of the base is ~~unimproved~~ and contains significant natural and cultural resources as well as limited public recreation opportunities.

Page 69, first column, last paragraph, first sentence, revised as follows:

The study area ~~is just outside the~~ lies west of the City of Santa Barbara and includes a portion of the newly incorporated City of Goleta.

Page 69, second column, second paragraph, second sentence, revised as follows:

Public access to the coast in the northern half of the study area is limited to Ocean Beach and Surf Beach, within a public right-of-way which cuts through the base from Lompoc.

Page 70, second column, first paragraph, revised to add the following sentence:

The right to higher density development than current zoning would allow has been established by a court decision at Naples. After a series of lawsuits between the county and the owners of the Naples property, the county and the property owner entered into memorandum of understanding which allows the owner to submit applications for up to 55 homes on 485-acres of land at Naples.

MANAGEMENT OPTIONS

Page 77, first column, third paragraph, revised as follows:

The National Reserve would have had a two part boundary: 1) a limited area along the coastal edge in which NPS would be authorized to acquire land in fee to provide visitor services and public access where ownership by other public entities was not feasible or practical (fair market value from willing sellers only), and 2) a larger area including watersheds from Eagle Canyon to Gaviota State Park and on Bixby Ranch, in which the Trust or NPS could acquire easements and collaborate on resource protection, agricultural conservation, public access and education.

Page 80, first paragraph, first sentence, revised as follows:

Under this management option, Congress would have established a National Seashore ~~focused on that~~ included only the coastal edge, south of U.S. Highway 101 and the Union Pacific Railroad.

ALTERNATIVES

Page 85, first paragraph, following the first sentence, revised to add new sentence:

A “no action” alternative under the National Environmental Policy Act (NEPA) is a baseline against which to measure other alternatives, and includes no change from current management direction or level of management intensity (Federal Register, v. 46, no. 55, p. 18027, 3/23/1981).

Page 85, second column, third paragraph, revised as follows:

The ~~14,400~~ 14,500 acre Hollister Ranch was subdivided in 1970 into ~~135~~ 136 (3 in common ownership) rural residential lots of approximately 100 acres in size. Development on these lands is restricted through covenants, conditions, and restrictions established at the time of subdivision; however there are houses and support buildings, built or authorized, on each lot, and there is an extensive road network. ~~Much~~ Most of the land is grazed through a cooperative grazing program, and is under Williamson Act contracts. The owners have also established a Hollister Ranch Conservancy to manage scientific research studies and education opportunities, and a 2.2 mile marine preserve at Alegria Beach to protect the rocky intertidal ecosystem.

Page 87, first column, first paragraph, last two sentences, revised as follows:

The California Coastal Conservancy, Santa Barbara County Coastal Resource Enhancement Fund, and state bond acts have been major funding sources. There are also several state programs that provide funding and incentives to landowners for conservation easements. Governmental programs that have provided funding for easement acquisition on the Gaviota Coast include the California Coastal Conservancy (\$7,600,000), Coastal Resource Enhancement Fund (\$2,400,000 over 5 years), Coastal Impact Assistance Program (\$212,000), and the Coastal Resource Grant Program (\$1,500,000 over five years). These programs have also provided funding for other conservation actions and are discussed further, under Section 4, “Regulatory and Incentive Programs” and Section 5, “Public Land Management and Access.” The following state programs were developed specifically to provide funding and incentives for landowners.

Pages 88-89, beginning at page 88, second column, last paragraph, revised as follows:

Grassland Reserve Program: (Natural Resource Conservation Service) This program was recently funded under the 2002 Farm Bill. The Grassland Reserve Program, authorized in 2002 by an amendment to the Food Security Act of 1985, is a voluntary program that helps landowners and operators restore and protect grassland or land that is located in an area historically dominated by grassland, forbs, and shrubs, and that has the potential to provide habitat for species of ecological value. Priority is given to those lands under the greatest threat of conversion to other land uses. The program supports conservation of grazing operations while maintaining plant and animal biodiversity. The United States Department of Agriculture and the Natural

Resource Conservation Service administer the program, while funding comes from the Commodity Credit Corporation.

Ranchers and other private grassland owners who enroll in the program agree to place 10, 15, 20 or 30-year rental contracts or 30-year or permanent easements on their land, prohibiting development and other activities incompatible with conserving grassland ecosystems. In return, landowners receive annual payments for short-term contracts or either a one-time payment or up to 10 annual payments for permanent easements. The Farm Bill authorized up to 2 million acres to be enrolled in the program, at a cost of up to \$254 million. The program imposes no regulation on grazing and allows private entities, such as ranching land trusts, to hold easements under the program. The program also makes additional resources available to assist landowners in restoring enrolled grasslands. Approximately \$50 million in funding was made available nationwide in 2003.

Page 89, first column, revised by adding the following text after paragraph 1:

Rangeland, Grazing Land, and Grassland Protection Act of 2002. This goal of this newly adopted agricultural preservation program is to prevent the conversion of grassland, rangeland and grazing land to non-agricultural uses through the use of conservation easements. State Assembly Bill 1403 allocated \$20,000,000 of funding from the Proposition 40 bond measure to fund this program. The State Wildlife Conservation Board will administer the program.

Page 89, second column, following first paragraph, revised by adding new paragraph:

Uniform Rules for the Agricultural Preserve: To regulate land use on agricultural lands with Williamson Act contracts, the County of Santa Barbara adopted the "Santa Barbara County Uniform Rules for Agricultural Preserves and Farmland Security Zones." These rules establish requirements and qualitative considerations for agricultural preserves and compatible uses of the land in the agricultural preserve.

Page 90, first column, following the first paragraph, revised by adding new paragraph:

Santa Barbara Coastal Resources Enhancement Fund (CREF): The County of Santa Barbara established the Coastal Resources Enhancement Fund in 1987 to help mitigate significant impacts of offshore oil and gas development to coastal aesthetics, coastal recreation, coastal tourism, and environmentally sensitive coastal resources. The program has awarded 208 grants, for a total of \$14.1 million, for acquiring coastal properties or conservation easements, improving parks and recreational facilities, and planning and research for coastal properties. Over \$4 million of this fund has been expended on projects within the study area over the past five years. The County of Santa Barbara Energy Division anticipates that the program will continue to fund about \$700,000 in grants per year for the entire county.

Page 90, first column, following the section titled, "State Programs," revised by adding the following paragraph as the first subsection:

State Bond Measures: California recently passed two bond measures that set aside funding for conservation. The Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Act of 2000 (also known as Proposition 12) and the California Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Act of 2002 (also known as proposition 40). The combined funding available from both bond measures is \$4.7 billion. The majority of funds allocated from these bond acts go towards existing recreation and conservation programs including the California Coastal Conservancy, the Wildlife Conservation Board, California Department of Fish and Game, California State Parks or per capita contributions to California cities. A significant amount of funding was also set aside for specific regions of California through state regional land conservancies.

The Gaviota Coast benefits from such bond measures by obtaining funding through existing programs such as the California Coastal Conservancy. The California Coastal Conservancy received approximately \$400 million in combined funds from these bond measures. Of this amount, the California Coastal Conservancy provided \$7.6 million (2%) in funding toward easements and land acquisition on the Gaviota Coast.

Page 90, second column, following the section titled, *California Coastal Commission*, revised by adding new paragraph:

The California Coastal Commission works in partnership with the California Coastal Conservancy, the State Lands Commission and the California Department of Parks and Recreation to implement the mandate of the Coastal Act to protect and provide public access to the Coast. The Coastal Commission is also required by the Coastal Zone Management Act to implement the federally approved California Coastal Management Program. Priority initiatives for implementing public access include: 1) requiring public access as mitigation for private coastal development, 2) completing the California Coastal Trail, and 3) identifying and protecting historical public rights of access. At the local level, public access is implemented through Local Coastal Programs. In 1995, Santa Barbara County produced a draft Coastal Access Implementation Plan; however this plan was never finalized or adopted.

Page 90, second paragraph, second column, following the section titled, *California Coastal Conservancy*, revised by adding new paragraphs:

Other Coastal Funding Programs: Oil and gas development mitigation has in previous years provided funding for conservation on the Gaviota Coast. The Coastal Impact Assistance Program (CIAP) and the Coastal Resource Grant Program are two programs that administered grants with funds from oil and gas mitigation. Funding for these programs were one-time allocations for the mitigation of development activities. The funds associated with these programs were not meant to be ongoing and have already been allocated to Santa Barbara County.

Congress authorized the CIAP in fiscal year 2001 to mitigate the impacts of Outer Continental Shelf oil and gas development and production. Of this \$150 million, one-time, appropriation, \$15 million was allocated to California and \$1.2 million of California's allocation was given to Santa Barbara County. Within the study area, funding from this allocation went towards the update of the Santa Barbara County Local Coastal Plan (\$400,000), Gaviota Coast land acquisition (\$212,203), Gaviota Creek Watershed Management (\$100,000), and Santa Barbara Shores Specific Plan amendments (\$200,000).

The Coastal Resource Grant Program was administered by the State Resources Agency between 1997 and 2002. During this time, approximately \$4 million in funding was granted to projects in the study area. Projects funded include grants for land acquisition (\$2,400,000) improvements to parks and coastal facilities (\$1,400,000) and planning/research (\$300,000).

Page 92, second column, first paragraph, revised by adding new sentence at the end of the paragraph:

The county will continue to manage or restrict public access to beaches as necessary during the western snowy plover nesting season.

Page 92, second column, second paragraph, revised by adding new text to begin the paragraph:

The California Coastal Trail Program is a joint partnership between the Coastal Commission and the Coastal Conservancy. The Gaviota Coast represents one of the largest gaps of continuous shoreline passage in the state. Proposition 12 allocated \$5 million towards the completion of the California Coastal Trail. The Coastal Conservancy estimates the capital outlay needed to complete the 88 miles of coastal trail in Santa Barbara County to be \$28 million.

Page 95, first column, first paragraph, following the second sentence revised to add new text:

Programs and tools under Alternative 2 are options to be pursued at the discretion of the local community, if desired. They do not reflect any directive from the NPS. The NPS would have no role in implementation of these programs and tools, except in pre-existing NPS programs, as noted. The NPS role is the same in Alternative 2 as in Alternative 1.

Page 95, first column, following the first paragraph, revised to add new paragraph:

Under Alternative 2, current agricultural land would remain in agricultural use as long as landowners are willing and able to continue this use of the land. The programs and tools presented in Alternative 2 are focused substantially on assistance to private landowners, and mechanisms to conserve resources when agriculture is discontinued for economic or personal reasons.

Page 95, second column, first paragraph, revised to add new sentence:

These actions would be entirely voluntary on the part of the landowners.

Page 96, first column, bullet 1, first sentence, revised as follows:

Landowners could sell their land or development rights to non-profit or governmental organizations, in order to ensure that their land will not be inappropriately developed in the future.

Page 97, first column, first paragraph under section titled, *Agricultural Land Conservation*, revised to add text after first sentence: The Gaviota Coast's active ranching and farm lands are an essential part of the area's scenic and cultural identity, and provide open space and wildlife habitat benefits, in addition to local food production.

Page 97, second column, first paragraph under section titled, *Regulatory and Incentive Programs*, revised to add text after first sentence: These programs would be developed at the discretion of and under the direction of local government and local voters. Further consideration of the costs and benefits of these programs would be a part of the public decision process.

Page 97, second column, photo caption, revised to add text:

Isla Vista/City of Goleta

Page 98, second column, first paragraph, first sentence under section titled, *Establish an open space district*, revised to add text:

Regional open space districts generally are independent districts whose main function is to acquire, preserve or maintain open space for uses such as recreation, agriculture, watershed protection or to protect important views.

Page 98, second column, second paragraph under section titled, *Establish an open space district*, first sentence, revised as follows:

A regional open space district could be established to provide an additional funding source for acquiring land and conservation or agricultural easements in the Gaviota Coast area.

Page 99, first column, first paragraph, revised to add sentence to the end of paragraph:

Open space district funding could be used to acquire agricultural easements or to protect viewsheds, without providing public access, or it could focus on public land acquisition with public access, or some combination.

Page 99, first column, first paragraph under section titled, *Develop a Transfer of Development Rights Program*, revised to add sentence at the end of paragraph:

Santa Barbara County has considered TDR programs in the past, but has been unable to identify appropriate areas for inclusion. Nevertheless, this type of program may offer a means to allow for development in appropriate areas, while limiting it in less desirable areas.

Page 100, first column, first paragraph under section titled, *Public Land Management and Access*, revised to add sentence at the end of paragraph:

These decisions should be made locally, with community involvement.

Page 100, first column, first paragraph under section titled, *Establish a state land conservancy for the Gaviota Coast*, second sentence, revised as follows:

"Working with willing sellers or willing landowners, such a conservancy would..."

Page 101, first column, first paragraph, following the last sentence revised to add text:

Any designation of significant sites would be entirely voluntary.

Page 101, first column, last paragraph, third sentence, revised as follows:

These organizations and others could continue to work with landowners and managers to protect sacred sites and archeological resources, and to ~~obtain~~ seek access or ownership of important sites for ceremonial, interpretive and educational purposes.

Page 101, second column, first partial paragraph, revised to add text to last sentence:

They could work with the US Coast Guard or subsequent owners to develop interpretive opportunities at Point Conception if appropriate access were possible.

Page 101, second column, first paragraph under section titled, *Focus additional resources on coastal trail planning and development*, revised to add sentence to the end of paragraph:

Development of the Coastal Trail would be in accordance with locally established policies for trail siting and at the discretion of private landowners or public agencies.

Page 101, second column, last paragraph, first sentence, revised as follows:

The county could work to create connector trails from the coastal trail up the canyons to significant viewpoints or to the Los Padres National Forest in several locations where landownership patterns allow.

Page 102, first column, first paragraph, first sentence, revised as follows:

...could be accomplished working cooperatively with willing private property owners, State Parks and the Los Padres National Forest to acquire trail rights of way and easements to provide non-motorized recreational trails.

Page 102, second column, first paragraph under section titled, *Develop additional coastal access opportunities*, revised as follows:

The coastal land below the mean high tide line, and the first three miles of ocean, are considered public trust resources, and thus belong to all the people of California. Additional access points to these public resources could be developed to provide recreational opportunities for people of all races, cultures and incomes. This should be done in cooperation: with area landowners in accordance with current county policies and consultation with landowners and should respect private property, and privacy concerns, and avoid areas where agricultural operations would be negatively impacted. Trails should be sited in areas that would not cause significant impacts on natural, cultural or agricultural resources. This could be accomplished through careful design of trail systems and public education efforts. Monitoring programs and adaptive management strategies should be pursued to ensure that trail use does not impact resources once trails are established. Additional access has been proposed at a number of sites, and could become available in conjunction with sale or development of some of these properties.

Page 103, second column, first paragraph under section titled, *Enhance federal agencies' involvement with surrounding communities*, revised as follows:

The Los Padres National Forest leadership has expressed interest in working more closely with interested local landowners and organizations in voluntary collaborative land management and resource protection, educational and interpretive programs, and public access.

Page 103, second column, second paragraph under section titled, *Enhance federal agencies involvement with surrounding communities*, revised as follows:

The Juan Bautista de Anza National Historic Trail could take advantage of additional opportunities for public education and interpretation on publicly accessible land, if additional coastal open space were protected...

Page 104, first column, third paragraph, revised as follows:

While Vandenberg AFB offers periodic tours, the base does not currently have the staff capacity to offer regular tours focused on the base's natural and cultural resources. Vandenberg AFB could work with non-profit conservation and education organizations to allow additional guided tours of the base in order to increase public appreciation and understanding of the base's natural resources, historic sites, and current missions. Such tours could be subject to approval . . .

ENVIRONMENTAL ASSESSMENT

Page 113, second column, third paragraph, revised to acknowledge that the NPS is not identifying a preferred alternative.

The "preferred alternative" is the agency-preferred course of action. The NPS has chosen not to identify a preferred alternative because there is no NPS action under either alternative.

Page 114, table 8, revised to add the following programs to "Policies and Regulations" column:

- California Land Conservation Act (relates to impact topics: Land Use, Biological)
- Marine Minerals Management Act (relates to impact topics: Water)

Page 120, first column, photo caption, revised as follows:

Highway 101, Malibu, California

Page 122, first column, first paragraph under section titled, *Population and Housing*, revised to add sentence to the end of paragraph:

The county should take steps to minimize the indirect impacts on affordable housing. One option could be to explore pursuing higher density infill development in existing urban areas.

Page 123, second column, revised to add the following text to the last paragraph as the third sentence:

Similar to Alternative 1, traffic volumes could increase on the roads within and near the study area due to growth in the surrounding communities. Specific recreation development could have localized adverse circulation impacts that could be mitigated through site design and access improvements.

Page 125, first column, first paragraph, second sentence, revised as follows:

One third of the land for sale was recently protected from future development through conservation easements or land acquisition.

Page 127, second column, first paragraph, first sentence, revised as follows:

Agricultural use of the land has become secondary to residential uses on ~~many~~ some of the lots.

Page 127, second column, second paragraph, last sentence, revised as follows:

Fifty-five homes are currently proposed for this 485-acre site, although higher densities are allowed ~~site~~ based on approved subdivision plans developed for the Town of Naples by speculators in 1888.

Page 145, Table 17, revised as follows:

Santa Barbara Shores ~~County~~ City Park

Page 147, second column, second paragraph under section titled, *Conclusion*, revised to add sentence to the end of paragraph:

Impacts would particularly affect disadvantaged populations that currently do not have adequate access to coastal recreational facilities.

Page 163, Table 21, fourth bullet under Recreational Use and Experience, Alternative 1, revised to add text:

Impacts would particularly affect disadvantaged populations that currently do not have adequate access to coastal recreational facilities.

Page 165, second column, first paragraph under section titled, *Environmentally Preferred Alternative*, revise text:

The "environmentally preferred" alternative is the one that best protects, preserves and enhances historic, cultural and natural resources, and that causes the least damage to the biological and physical environment. ~~The environmentally preferred alternative is not the same as the agency or NPS "preferred" alternative. The NPS has not identified a preferred alternative because the actions identified in each alternative are local, state, and private actions, not NPS actions. The NPS will identify a preferred alternative in the final EA after analyzing public and agency responses to the draft alternatives.~~

PREPARERS

Page 243, under Acknowledgements, 14th bullet, revised as follows:

University of California, Santa Barbara. Michael Glassow, Professor and Chair, Department of Anthropology; Michael McGinnis, Associate Researcher, Ocean and Coastal Policy Center, Marine Sciences Institute.

Page 244, under *Statement of Significance: Contributors and Technical Review, Technical Review and Contributions by other Agencies, Experts or Scholars*, 10th line, revised as follows:
David Lackiey and David Ward. County of Santa Barbara, Department of Planning and Development.

Page 244, under *Funding for the Gaviota Coast Feasibility Study*, revised to include a third bullet:

- The project was partially financed by Santa Barbara County's Coastal Resource Enhancement Fund, a partial mitigation of impacts from the following offshore oil and gas projects: Point Arguello, Point Pedernales, Santa Ynez Unit, and Gaviota Terminal.

III. Summary of Public Comments and Responses

INTRODUCTION

The study team reviewed all e-mails, letters, faxes, and other documents submitted during the 90-day comment period. Comments were organized and analyzed according to the sections of the draft study report and other topic areas that proved to be a particular area of concern in the public comments. The comments were coded by topic and entered into a database. The National Park Service (NPS) study team grouped similar comments before providing the NPS response.

All comments were treated equally. The analytical process made no attempt to treat comments as votes, nor did it attempt to sway decision-makers towards the will of any majority. Emphasis was on the content of the comment rather than the number of people who agreed with it. This type of content analysis ensures that every comment is considered in the decision process.

The comment analysis and response section of this report is divided into topics that primarily relate to sections in the draft study. This includes study process, resource description, significance, suitability, feasibility, alternatives and environmental assessment, and illustrations and references. To fully represent concerns raised by public comments, additional topical areas have been added to group similar comments.

Each section has an introduction followed by topics and subtopics on more specific concerns. These public concerns represent common themes identified from the comments.

STUDY PROCESS

This section responds to comments regarding how the NPS conducted the study process. Comments related to the study process included concerns regarding public involvement, study initiation, and recommendations to improve the study process.

Public Concern: The study was initiated improperly, with inadequate involvement of area landowners prior to study authorization.

Comments included:

- Perception that the study was initiated by “secret maneuvering” of small group of private interests.
- Landowners were excluded from sessions that set the groundwork and boundaries for the study.
- Local environmental groups worked with elected officials in attempting to convert private land to federal rule without consulting landowners.
- Clarify that “local requests” for the study were not from landowners or residents within the study area.
- The Gaviota Coast Feasibility Study was not the federal government’s idea. Local citizens with valid concerns petitioned the NPS for this study.

Response: NPS followed standard practice for authorization of studies. Prior to study authorization, the typical process is one of community groups or other interest groups advocating for authorization of a study. According to NPS and Department of Interior policy and directives, internal scoping early in the planning process is not intended to be a public planning process. Requests for the study were received from organizations that included local residents, landowners and others in their membership, and from elected officials representing the Gaviota Coast.

Public Concern: The NPS was inappropriately involved in advocacy for a national seashore before the study was authorized.

Comments included:

- The NPS, through its Rivers, Trails and Conservation Assistance Program, coordinated efforts of environmental organizations and county staff to initiate a 22,000-acre national seashore in April 1994 at UCSB.
- The Santa Barbara Audubon Society organized and presented a conference on Gaviota Coast resources and protection options in 1994. Experts from the state, federal and local levels kick-started the effort to plan a protection and preservation plan for the whole Gaviota Coast, which became the Gaviota Coast Feasibility Study.
- The NPS study team enabled an introduction between an environmental organization and a foundation, encouraged environmental organizations to lobby membership and elected officials to support Gaviota as unit of the national park system (political lobbying is forbidden to 501(c)(3) charters).
- A local state assemblyman, the office of Santa Barbara County Third District Supervisor and county staff were principle players. A congresswoman, two California senators, and the NPS regional director also got involved.

Response: NPS involvement in this area prior to study authorization was completely within the bounds of existing authorized programs.

In 1994 NPS staff were requested to speak at an Audubon Society conference on the Gaviota Coast. NPS staff attended the conference and gave a presentation on a range of conservation strategies, including NPS designation and local conservation options. As a public agency, the NPS is responsible for providing such information about its programs, and is authorized to provide technical assistance on conservation issues.

NPS provided technical assistance to local conservation groups concerned with the Gaviota Coast from 1995-2000, through the separately authorized Rivers, Trails and Conservation Assistance Program (RTCA). This project was one of several dozen assisted by the RTCA Program in the Pacific West Region during that time. Technical assistance can relate to a wide range of topics, such as resource assessments, strategic or conceptual planning processes, assistance in fundraising and information about building support for conservation [non-profit organizations may legally communicate with their members about legislative issues, and engage in limited lobbying on legislative issues].

As interest in a NPS feasibility study grew, NPS responded to local inquiries and provided information regarding feasibility studies for new areas, as appropriate, including meeting with local elected officials when requested.

Public Concern: The NPS provided inadequate opportunities for landowner involvement in study process.

Comments included:

- Residents were never contacted by NPS for specific input "(other than via generic "Worksheets" that had no controls to ensure accuracy and validity)."

Response: There was no intent to exclude landowners from the study process, and landowners actively participated in it. The study was authorized in November, 1999; public involvement started soon after that. Many area landowners attended the first set of public meetings held by the NPS in March, 2000, attended subsequent meetings with the NPS, and submitted comments during the 11-month public scoping process, an additional 8-month comment period on alternative concepts and protection strategies, and the 3-month review period of the draft study report. The NPS used many sources of information (see References section, pages 235–242) to verify accuracy of information received through public comments and worksheets.

Public Concern: The NPS did not adequately notify landowners and residents about study.

Comments included:

- Study team relied on Santa Barbara County Planning and Development Department to provide official notification to several hundred potentially affected landowners, rather than purchasing assessor parcel number (APN) records with the names and addresses of all study area residents.
- Release of study, public meetings and public comment period were not announced in the Federal Register.

Response: The NPS used all property owner address information (approximately 900 landowner names and addresses) that was available within the necessary timeframe for notification of initial public meetings in March, 2000. In addition, there was extensive print and broadcast media coverage before public meetings and throughout the study process.

Federal Register notices are not required for any aspect of an environmental assessment, including public meeting notices, availability of the study, and public comment periods. A Federal Register notice was published on September 12, 2000 to re-initiate scoping when preparation of an environmental impact statement was anticipated.

Public Concern: The NPS asked for input from local citizens, but ignored all of the input from agricultural organizations.

Response: The NPS paid considerable attention to comments from agricultural organizations and landowners, including finding that the area is not a feasible addition to the national park system (in part

based on opposition from agricultural landowners) (draft study report, page 74), and developing alternatives focused on local control.

Public Concern: The study process affected local conservation efforts:

a) It disrupted current efforts of state and local conservation organizations to buy property and development rights on a voluntary basis.

Comments included:

- The study and proposals surrounding it have contributed to a great deal of controversy in Santa Barbara County.
- Since the study was first announced, several landowners who initially expressed an interest in selling their development rights to preserve their ranches, are no longer considering the option, pending final resolution of the study.

b) It brought people together to try to build consensus about how to protect the Gaviota Coast.

Comments included:

- People who would not talk to each other are now trying to build consensus about how to protect and manage the Gaviota Coast.
- The study generated an enormous amount of energy in the community. It has yielded some very tangible results. The study has produced critical information which will aid the community in its efforts to provide permanent protection for this beautiful and valuable stretch of coastline.

Response: The study received considerable attention, positions became polarized, and differently slanted information about the future of the area was disseminated by a variety of interests. The NPS has no way of knowing what conservation activities would have taken place in the absence of the study process. However, during the study process, numerous conservation land transactions, such as El Capitan Ranch, did take place, and several new groups, such as the Study Group and Common Ground, formed to discuss how best to conserve the resources of the Gaviota Coast.

Public Concern: The study process was flawed.

Comments included:

- The public meeting and input process, theoretically designed to give the public an opportunity to express their input, is skewed towards those who oppose it.
- There is a conflict of interest in having NPS conduct a feasibility study since it would be the agency in charge of the proposed schemes. The study should be prepared by independent entity.
- NPS exceeded its mandate by evaluating environmentally preferred alternatives for the study area and proposing enhanced local and state management of the area.
- Process by which Congress selects possible additions to the national park system is flawed, instigated by a small group of local individuals representing special interests. Process should be managed from a national perspective, taking into account national priorities, goals, and all alternatives.
- A critical element has been missing in the study process since the beginning: a good faith effort to bring all sides together to determine how to best preserve agriculture in Santa Barbara County.
- Goals were established improperly, in an undemocratic fashion.
- NPS criteria of "land sufficient and appropriate" needs to be revisited, because other nationally significant areas across America suitable for inclusion, such as Gaviota Coast, could be lost forever.

Response: The study was authorized by Congress, and carried out according to the process and criteria established by Congress and further defined by NPS management policies. Through this process, the NPS is charged with evaluating the potential of an area for inclusion in the national park system. NPS professionals evaluate the criteria for inclusion in the National Park System and consider public comment and support. In this type of study, if it is determined that NPS management is not appropriate, the NPS recommends other

management strategies (NPS *Management Policies*, Sec. 1.3.4). NPS policy requires identification of an environmentally preferred alternative in an Environmental Assessment. The NPS is also required by law to conduct these studies in compliance with the National Environmental Policy Act, including public involvement and review processes.

Public Concern: A study process more focused on building consensus and finding shared solutions to the area's problems would have been more effective.

Comments included:

- Coming up with an understanding of what the problems and workable solutions are is a complex job. The effort would have been enhanced if NPS was proactive, instead of walking away.
- Goals can be achieved through cooperation and consensus with local residents to achieve mutually shared goals. This approach requires more time, initiating and developing working relationships, and listening to many stakeholders, but it's more successful and offers creative solutions in reaching shared goals.
- A process of relationship building that values listening, developing trust, respect, and involvement can be implemented. A mutually shared goal held apparently by the majority of people is the protection of Gaviota Coast, and threatened by potential development, there are many with a passion to preserve it.
- Commenter believes the demands of serving the public interest requires reaching beyond feared outcomes to find practical outcomes and mutually beneficial solutions for the long term.

Response: Comments noted.

Public Concern: Study cost was excessive; stop the study process now.

Comments included:

- Study conclusion that the area is unique and desirable comes at a considerable cost to taxpayers especially considering the maintenance backlog.
- Stop the study process immediately and cease spending taxpayer dollars on unauthorized and unnecessary work.
- Since NPS feasibility criteria are not met, expedite the conclusion of the study as unsuitable and infeasible.

Response: The costs of this study are reasonable when compared with costs of similarly complex studies and the high level of public interest and involvement. The study was authorized by Congress. The NPS is required to complete the process by finalizing the study report, complying with the National Environmental Policy Act process, and transmitting a recommendation to Congress.

Public Concern: It is important that locally-based efforts to protect the Gaviota Coast continue.

Comments included:

- The people involved in the Gaviota Study Group, Common Ground and other local preservation efforts have demonstrated their willingness to see this difficult task through. It is critically important for these individuals and interested groups to remain focused and finish the hard work.

Response: Comment noted.

Public Concern: The study did not disclose, discuss or evaluate the rights of owners who have maintained properties deeded under a Spanish Land Grant and who are descendents of the original grantees.

Response: NPS research indicates that the method by which title transferred into private ownership (i.e. Spanish grant, Mexican grant, or U.S. patent) may be culturally significant, but does not affect the quality of title to the land. Land deeded under a Spanish Land Grant does not come with rights that are different from any other property rights.

Neither alternative in this study includes NPS land acquisition or proposes public acquisition of any specific land parcels. Property rights are recognized throughout both alternatives.

Additional Public Concerns: Opinions about the study and NPS involvement:

Comments included:

- At the public meetings I heard landowners say that they did not want NPS involvement now or in the future. Conservationists were concerned about money for conservation. No one wanted a National Park.
- At the scoping meetings, representatives from farming and ranching communities, other interest groups, public agencies, participated and expressed concerns and opposition to the study.
- Although there has been some organized opposition to the NPS involvement from a limited number of landowners, commenters have seen and generated overwhelming support for NPS involvement from the greater community and have submitted hundreds of postcards calling for completion of the study.
- The list of values on page 214 of the draft study report omits values held by most of the residents.

Response: The NPS received a wide range of comments that were expressed at the public meetings and during the study process. These comments represent a wide range of views on the consideration of a national park in Santa Barbara County. Views both for, and against, the establishment of a national park have been expressed. The list on page 214 is a summary of comments received by the NPS during the initial public scoping period, March-June 2000, as published in a newsletter in July, 2000. All of the summaries of public comments that the NPS published in newsletters throughout the study process were reproduced for the readers' convenience in the appendices of the draft study report on pages 214-230.

Additional Public Concerns: How public opinions are expressed and evaluated.

Comments included:

- NPS should consider all comments, not just those of local residents. Protecting the area is a matter of national interest.
- Opponents have raised large amounts of money to lobby and intimidate residents of Santa Barbara County against a national seashore.

Response: NPS study process recognizes national interest as well as local interests. All comments are considered. The NPS is aware of many campaigns and activities to influence public and political opinion related to this study.

RESOURCE DESCRIPTION

This section examines comments regarding the factual research describing the study area and its resources. Comments are separated into three topics: natural resources, cultural resources, and general comments. Comments on the Resource Description section of the draft study report ranged from public concerns regarding the status of rare, threatened and endangered species and concerns over how cultural resources were depicted in the Resource Description.

NATURAL RESOURCES

Public Concern: There is no mention of how species in the study area are being degraded or lost and there is no scientific evidence that would support the need for NPS to have increased involvement in their protection.

Response: Pages 17-26 of the draft study report include descriptions of the status of rare habitat, threatened and endangered species. These descriptions describe how and why federally-listed species are being degraded and lost. In addition, Table 15 in the Environmental Assessment includes a summary of threats to both state and federally-listed threatened and endangered species. Because the NPS determined Park Service management options to be infeasible, detailed analysis of the impacts and benefits of NPS management of such species and habitat was not included in the draft study report.

Public Concern: Tables A1 and A2 lists species that live outside, as well as within, the study area. Locations are primarily on Vandenberg Air Force Base, Hollister Ranch and Arroyo Hondo. Many species change from season to season while others are transient species; many may be scarce elsewhere but can hardly be considered rare here.

Response: Many transient species rely heavily on habitat within study area. This is because the study area is a refuge to species whose habitat has been degraded in other areas along the southern California Coast. For example, giant kelp beds are especially abundant on Santa Barbara's Channel Coast. Kelp beds in southern California have been reduced by two-thirds since 1957.

The fact that the study area contains larger populations of threatened or endangered species than other parts of the west coast demonstrates the importance of protecting the habitat. The draft study report states that significant habitats are important to preserving our collective national heritage.

One of the reasons that Vandenberg Air Force Base, Hollister Ranch and Arroyo Hondo have more listings for species is because more studies and surveys have been conducted in these areas in recent years.

Public Concern: Gaviota tarplant is prolific and opportunistic; it springs up in disturbed soil. This species is not in need of federal protection and "junk science" has listed this species as endangered and protected by the Endangered Species Act. Someone could gather some seed and package it and it could grow all over the Great American Southwest.

Response: Both the California Department of Fish and Game and the U.S. Fish and Wildlife Service have designated the Gaviota tarplant an endangered species based on numerous scientific studies and surveys conducted over time. The Endangered Species Act requires the U.S. Fish and Wildlife Service to make its listing determinations solely on the basis of the best available scientific and commercial data after reviewing the status of the species.

The U.S. Fish and Wildlife Service states that the Gaviota tarplant and its associated habitat "have been much reduced due to residential, commercial, agricultural, and oil and gas development. These species continue to

face threats from development of military activities, alteration of natural fire cycles and invasion of non-native species (65 Federal Register 54, March 20, 2000).” The U.S. Fish and Wildlife Service also states that the number of annual plant species present from year to year can vary dramatically, depending on climatic conditions and other factors. The small population remains vulnerable from year to year.

The Gaviota tarplant could not be propagated in other areas of “the Great American Southwest” since it relies on soil characteristics and climactic conditions specific to the Santa Barbara Coast. The plant is restricted to Concepcion and Milpitas-Positas soils. For more information see 65 Federal Register 54, March 20, 2000.

Public Concern: The snowy plover populates shorelines from Washington State to Ensenada, Mexico. Every beach in the study area is home to the snowy plover. East and west coast beaches then ought to be closed to the public every summer to protect snowy plovers everywhere.

Response: The western snowy plover’s range does not include the east coast. As stated in the comment letter, it is restricted to the west coast, between southern Washington and southern Baja Mexico.

The US Fish and Wildlife Service (USFWS) is responsible for beach closure policies. The study report describes existing policies and conditions. The USFWS has established beach closures in California to protect the nesting or breeding habitat of the western snowy plover, as opposed to all shorelines that the western snowy plover populates. “Larger populations of breeding birds occur in the south than in the north, suggesting that the center of the plovers’ coastal distribution lies closer to the southern boundary of California (60 Federal Register 41, March 2, 1995).” Surveys indicated that there are 28 known breeding sites on the Pacific Coast of the United States. Of these, 20 are located in California. Of these 20, eight (including sites at Vandenberg AFB, Ocean Beach, Jalama Beach, and Coal Oil Point) areas support 78% of the California breeding population. For more information, see 60 Federal Register 41, March 2, 1995.

In designating critical habitat areas, the US Fish and Wildlife Service selected those nesting sites that have all components essential for the “primary biological needs of foraging, nesting, rearing of young, roosting, and dispersal, or the capacity to develop those habitat components (64 Federal Register 234, December 7, 1999).”

Public Concern: Long time resident has never seen a western snowy plover on the Gaviota Coast and its beaches.

Response: Comment noted.

Public Concern: Seagoing steelhead are genetically identical to the landlocked rainbow trout. Rainbow trout are healthy and breeding in coastal watersheds, despite the obstacles to upstream migration.

Response: The public concern misstates information regarding steelhead. The National Marine Fisheries Service (NMFS) distinguishes “rainbow” trout from “steelhead” based on anadromy. Steelheads are anadromous, meaning they migrate as juveniles from fresh water to the ocean, and then return to spawn in freshwater. In-stream barriers are listed as a threat to steelhead (63 Federal Register 53, March 19, 1998). Critical habitat has been designated for Southern steelhead (*Oncorhynchus mykiss irideus*) for streams, rivers and tributaries in the study area (65 Federal Register 32, February 6, 2000).

Public Concern: Southern Steelhead has an opportunity to return to spawning grounds in the area only during ideal conditions, occurring only once or twice in a decade and only where obstacles allow.

Response: Southern steelhead have an opportunity to return to spawning grounds on a yearly basis. However, severe drought and low stream flow can serve as a barrier in some years. In addition, lagoons need to be breached in order for steelhead to enter streams. A fisheries biologist at the Cachuma Operations and Maintenance Board confirmed that steelhead typically return to spawn on a yearly basis on the Gaviota Coast. While this is not true of all creeks and streams, there are a few reaches where conditions allow regular spawning.

Public Concern: California condors don't often frequent the study area. Commenter is unaware of any having been reported within the study area boundary in the last 50 years.

Response: The Los Padres National Forest, a portion of which is located in the study area, is one of the California Condor Recovery Program release sites. The study area contains habitat suitable for the breeding of condors upon release.

Public Concern: The Gaviota Coast is the last Southern California Beach / riparian ecosystem that remains relatively untouched. Proximity to the coastal area of Point Conception makes the Gaviota Coast an important buffer zone for a fragile and endangered coastal ecosystem which supports large colonies of sea otters, abalone, etc.

Response: The draft study describes the importance of the Gaviota Coast watersheds to the offshore marine environment on page 13. This factor is also included in the statement of national significance.

Public Concern: Wildlife and agricultural protections must take a priority over public access, as evidenced by the resource protection section in the study.

Response: No specific locations for or amounts of public access are mandated under either alternative; these decisions are to be made locally. Trails and recreational facilities can be established without significantly impacting natural resources and agricultural activities. "Use of siting, design, monitoring, and educational programs as well as adaptive management strategies could mitigate impacts from recreational activities (Environmental Assessment, p. 139)." The draft study report assumes that any additional recreational development would be sited in a way that would avoid impacts to resources.

Public Concern: Are there beavers in the Santa Ynez watershed?

Response: Beaver activity is listed as a threat to the endangered unarmored threespine stickleback (page 23 of the draft study report) which can be found on Vandenberg AFB in San Antonio and Canada Honda Creeks.

Public Concern: The Gap Analysis Program and multi-source land cover data demonstrate that California is well-aware of its natural and cultural resources. University of California, Santa Barbara has done their own data analysis funded by federal grants. Representative Capps was well aware of such programs and should have never requested the "study."

Response: The purpose of the Gaviota Coast Feasibility Study is to assess the area's resources, using the best available information, and to determine if the study area is suitable and feasible for inclusion in the National Park System. In conducting Special Resource Studies, the National Park Service relies as much as possible on existing information sources to conduct resource analysis. The California GAP Analysis was one of many existing sources of information used by the National Park Service in assessing study area resources.

CULTURAL RESOURCES

Public Concern: Commenter is dismayed that no oral histories have been included in the study since many families have been ranching on the Gaviota Coast since the Spanish Land Grant era.

Response: The draft study report acknowledges on p. 51 that more research is needed on the significance of ranching on the Gaviota Coast. Oral histories from families that have lived on the land since the Spanish Land Grant era would be an important component of this research. Funding was not available to conduct such specific primary research for this study.

The *Draft Gaviota Coast Feasibility Study and Environmental Assessment* is a Special Resource Study. In conducting Special Resource Studies, the National Park Service relies as much as possible on existing information sources to conduct resource analysis. More detailed resource studies are typically conducted if Congress designates an area as a unit of the National Park System.

Public Concern: The Draft Gaviota Coast Feasibility Study ignores and distorts the history and cultural importance of the Chumash people.

Comments included:

- The location of the Barbareño Chumash extended to Point Conception.
- The extent of trade systems between the Chumash and other Native American Groups were significant and extended “within and without North America.”
- In addition to the Mission systems, there were many factors that contributed to “genocidal conflict.”

Response: Studies relating to the Chumash often differ in opinion regarding various aspects of Chumash history. The NPS has revised the draft study report to reflect the concerns of the Barbareño Chumash regarding the historical location of the Barbareno Chumash and the extent of the trade systems. The NPS acknowledges that there were many contributing factors to the decline of the once abundant Chumash population.

Public Concern: The Barbareno Chumash Council (BCC) is against more archeological studies as stated on page 27.

Response: Comment noted.

Public Concern: The Rancho del Cielo was sold to the Young America’s Foundation because the Clinton administration was not interested. It is managed without cost to taxpayers.

Response: The NPS was not authorized to conduct a feasibility study to evaluate the potential for this site to become a unit of the national park system. California State Parks did evaluate its potential as a state park unit, but did not establish a state park. Rancho del Cielo is now owned and managed as a Presidential historic site by the Young America’s Foundation.

Public Concern: Study concludes that over 2/3 of the study area's historic resources, including most of 14 Chumash sites identified, paleontology and much of the unique biota are already under federal protection and management in Los Padres National Forest or by U.S. Air Force under the highest level of security in the nation. Reagan Ranch and Vandenberg Air Force Base considered NPS involvement in their operations obtrusive.

Response: The draft study does not propose or recommend National Park Service management on Vandenberg Air Force Base, Reagan Ranch, or the Los Padres National Forest.

Public Concern: Most of the archeological sites listed in the Cultural Resources Inventory are located on Vandenberg Air Force Base. These resources could thus be protected through discussions between the Department of Defense and the Department of the Interior.

Response: There are two reasons why most of sites listed in the Cultural Resources Inventory are located on Vandenberg Air Force Base:

- 1) Existing sites on private land were not listed in the study for reasons of privacy; and
- 2) The comprehensive surveys of historic and archeological sites that have been completed by the U.S. Air Force have not been undertaken in other portions of the study area.

Vandenberg AFB actively and effectively protects archeological sites on the base.

Public Concern: Request further research and analysis on areas of national significance for:

- Ranching and multi-generational families on the Gaviota Coast
- Chumash ethnic homelands

Response: The *Draft Gaviota Coast Feasibility Study and Environmental Assessment* is a Special Resource Study. In conducting Special Resource Studies, the National Park Service relies as much as possible on existing information sources to conduct resource analysis. If an area studied by the National Park Service is recommended for inclusion in the National Park System, and Congress designates such an area a unit of the National Park System, then more detailed resource studies and plans are typically conducted.

The study report identified ranching history as an area in which more research was needed (see page 51). Funding was not available to conduct such specific primary research for this study.

While the significance of Chumash ethnic homelands in the study area is well-documented in areas such as Vandenberg AFB, the draft study report acknowledges that significant portions of the study area have not been extensively surveyed or inventoried (draft study report, page 29). More research is needed to assess the significance of sites in less documented areas.

Other public comments:

- The land is home to many rare plants and animals and California's most important archeological sites.
- Impressed by the inventory work in the study.

Response: Comments noted.

SIGNIFICANCE

This section examines comments regarding the finding of national significance for the study area. Comments are separated into three topics: natural resources, cultural resources, and general comments. The majority of these comments were opinions expressing agreement with the National Park Service's recognition of nationally significant resources on the Gaviota Coast. Comments discussed in this section range from requests to include more information in the statement of national significance to challenges regarding the criteria used to establish national significance.

NATURAL RESOURCES

Public Concern: The report is missing the significance of the Gaviota Coast as it pertains to the entire West Coast. Migratory species rely on this area. At a recent meeting of the Council for Environmental Cooperation (NAFTA), the Council recommended priority conservation areas to environmental Cabinet members of United States, Mexico, and Canada. The Gaviota Coast was included in the list.

Response: While this recommendation certainly contributes to the significance of the study area, the NPS has already established the national significance of sensitive areas that migratory species would rely on for essential habitat.

Public Concern: There is a rare seal rookery located between the mouth of Eagle Canyon Creek and Naples. The offshore reef at Naples is a valuable marine resource.

Response: The draft study report includes the area between Dos Pueblos and Eagle Canyons in the list of marine mammal hauling out and pupping sites within the study area (see draft study report, p. 25). Naples reef is also acknowledged for its unique biological character (see draft study report, p. 18).

GENERAL COMMENTS

Public Concern: The determination of infeasibility should be based on the inability to make a finding that the area possesses nationally significant resources in the area. Residents of neighboring counties consider their counties to rival the resources of Santa Barbara County. If every county in California can be said to possess unique resources that could be considered nationally significant, it means the analysis could be applied to every non-urbanized area. The area is beautiful but not pristine; it has urbanization and farming. It cannot be designated as possessing national significance.

Response: The NPS stands by its finding that the study area contains nationally significant resources. Having unique resources alone, does not justify national significance. The criteria for determining national significance of a resource are as follows:

1. It is an outstanding example of a particular type of resource.
2. It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage.
3. It offers superlative opportunities for public enjoyment, or for scientific study.
4. It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource (NPS, 1990).

Pristine condition is not a criterion for national significance; however, as criteria 4 states, a resource must possess a high degree of integrity and should be a relatively unspoiled example of a resource.

Public Concern: Agree with the significance findings and analysis. The finding of national significance of the coast should require further protection through creative solutions.

Comments included:

- Disappointed, after finding numerous resources of national significance, NPS wants to drop the ball.
- Study area is the only Mediterranean climate in the United States and this alone is enough reason to save the area.
- The finding of significance is important because it shows the area is suitable for inclusion in the NPS.
- The land between the Goleta Urban Rural Boundary Line and El Capitan State Park, on the ocean side of the freeway, includes the last six miles of contiguous, relatively unprotected coastal parcels of open space on Southern California's coastal edge and contains significant resources.
- A larger percentage of the populace is aware of the significance and importance of Gaviota. There is no sentiment to allow sprawl.

Response: Comments noted.

Public Concern: The land between the Goleta Urban Rural Boundary Line and El Capitan State Park, ocean side of the freeway is rich in biological, cultural, historical, scenic, and recreational resources that have national significance. California Wilderness Coalition recently published "A Guide to Wildlands Planning in the Central Coast of California," which highlighted the biological importance of the area.

Response: Comment noted.

Public Concern: Disagree with the significance findings and analysis.

Comments included:

- Finding is duplicative.
- Gaviota Coast is significant in its current form, not as a National Park.
- Gaviota Coast is significant as free, private property.

Response: Comment noted.

SUITABILITY

The majority of comments received were opinions conveying agreement or disagreement with study findings for this criterion. Comments discussed in this section include public concerns over current protection of resources, access and different perspectives on NPS interpretation of the criteria for determining suitability.

Public Concern: Resource protection should have priority over recreation use.

Comments included:

- Resources on the Gaviota Coast are protected by Santa Barbara County land use restrictions, particularly in the coastal zone. In addition, the primary goal is to protect resources as opposed to providing public recreation.
- Public lands have not been well-managed. Los Padres National Forest has trash / human excrement along trails; trails are no longer maintained, new ones have been created by hiking enthusiasts. Ten miles of state and county coastal beaches have fared a bit better, yet are still affected by the same careless consequence of public access.
- Placing the public in the midst of a historical agricultural community would be detrimental.

Response: Trails and recreational facilities can be established without significantly impacting natural resources and agricultural activities. The draft study report states that, "use of siting, design, monitoring, and educational programs as well as adaptive management strategies could mitigate impacts from recreational activities."

Public Concern: The statement that the Gaviota Coast represents natural and cultural resource types that are not already adequately represented in the NPS or protected by another land management entity is inaccurate.

Comments included:

- The NPS includes an abundance of resources throughout California and the other western states including a substantial amount on the coast.
- These resources have been protected for 30 years, hence their existence – by private landowners.
- The study concludes that the Gaviota Coast natural resources and archeological sites are not represented in the NPS inventory. Examples can be found elsewhere, including Channel Islands National Park. But on Channel Islands National Park every vestige of the "vaqueros" cattle ranching period beginning with Spanish and Mexican rule and which represents the origin of cowboy tradition in the "wild west" is being eradicated by the NPS. All post Columbian influence on Channel Islands National Park is being expunged under NPS management, even rats.
- The historical agricultural operations have been proven to be good stewards and make inclusion in the NPS inappropriate.

Response: According to the 2001 NPS *Management Policies*, Section 1.3.2, an area is considered suitable for addition to the national park system if it represents a natural or cultural resource type that is not already adequately represented in the national park system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector. While many private landowners provide protection of resources on the Gaviota Coast, these resources are not protected for "public enjoyment."

Adequacy of representation is determined on a case- by- case basis by comparing the potential addition to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values.

Based on these criteria, the NPS has stated in the study report that the Gaviota Coast contains resources not yet adequately represented in the system. The study report, on page 62, documents how resources in other parts of California differ from those of the Gaviota Coast.

Public Concern: Commenter does not agree with statement on page 61 that ranching operations at Point Reyes National Seashore and Gaviota Coast "closely correlate."

Response: The two areas are similar in that they both represent coastal ranching landscapes. The study report indicates that before the study area's significance as a cultural landscape can be determined, studies are needed to evaluate the historical integrity of the study area as a coastal ranching district and to assess its contribution to the California and United States agricultural industry.

Public Concern: Finding of suitability is erroneous. Camp Pendleton would be more suitable; therefore, Gaviota Coast is unsuitable.

Response: This is a study of the Gaviota Coast area. Camp Pendleton is an active military base. While Camp Pendleton contains many significant resources, it is not "protected for public enjoyment by another land managing entity" (NPS *Management Policies*, 2001, section 1.3.2).

Public Concern: Other comments expressed general agreement or disagreement with the suitability findings and analysis (no substantive rationale was provided).

Response: Comments noted.

Public Concern: The only national seashore in the nation's largest state is 350 miles away from the 15 million residents in southern California.

Response: Comment noted.

FEASIBILITY

Many comments were received regarding the finding that the area is not a feasible addition to the National Park System. Comments include concerns regarding the accurateness of the feasibility analysis and different perspectives on the NPS interpretation of the NPS management policy criteria for determining feasibility.

BOUNDARY SIZE AND CONFIGURATION

Public Concern: Study area is too large and diverse to be feasible.

Comments included:

- The study area is beyond the scope of resources of any one agency. Resources would be better protected under private ownership and local agency regulatory control.
- Can't draw any accurate conclusions that would apply uniformly throughout the study area.
- It is inappropriate to reach a blanket conclusion for the entire study area.
- Area north of El Capitan State Beach has many issues that do not exist to the same extent for the land to the south.

Response: The "boundary size and configuration" criterion addresses whether the study area is of adequate size and configuration to protect the primary resources and to provide for appropriate use and development. The NPS stands by its conclusion that the study area is of adequate size and appropriate configuration. Cost and management capability issues are discussed below, under "Costs."

The study report recognizes the size and diversity of the study area, and addresses the different factors that affect feasibility in different parts of the study area.

LAND USE, OWNERSHIP PATTERNS

Public Concern: Sufficient land is currently available to the NPS for the establishment of a national park unit.

Comments included:

- There are 7,000 acres currently for sale in the study area: the 3,300-acre Brinkman property, the 1,406-acre Dos Vistas Ranch, the 2,422-acre ocean front property between El Capitan and Coal Oil Point. These areas adjoin 9,390 contiguous acres of publicly owned land and the 785-acre Arroyo Hondo Preserve. They could collectively provide a substantial core of a park.
- Study report states that "acquisition of a relatively small number of properties could provide a core of land and resources that could be managed as a national park unit." NPS designation does not depend on the NPS' ability to acquire the majority of the private lands in the study area.
- There is potential for the NPS to get involved with current willing sellers to prevent leapfrog development today. The purchase of land between Goleta and El Capitan State Beach from current willing sellers would control sprawl.
- Did NPS contact all landowners regarding willingness to sell, or make a conclusion based on the most vocal and organized landowners?
- The amount of public land in study area minimizes amount of land NPS would need to acquire for park.

Response: NPS practice is generally to acquire land from willing sellers. Considerable cooperation and collaboration with landowners is generally necessary in order for NPS to obtain authorization and funding to acquire any specific land area. NPS stands by their conclusion that adequate willingness to sell to NPS does not exist, and therefore, sufficient land is not available in the study area. In addition, the NPS has determined

that it is not able to undertake new land acquisition and management responsibilities of this potential cost and magnitude at this time.

NPS mapped and analyzed the landholdings of those who contacted the NPS to indicate unwillingness to sell or opposition to the study process. NPS did not directly contact landowners about their willingness to sell, as the NPS is not in a position to offer to acquire land.

Public Concern: The desire to keep United States Forest Service and state lands under current management is irrelevant and insufficient for the infeasibility finding.

Comments included:

- None of the NPS management options consider the transfer of management responsibility from other agencies to the NPS.

Response: Considerable public land exists in the study area. The presence of this public land does not directly contribute to infeasibility; however, it is land that is not available to the NPS. As stated in the study report, inclusion of other public lands within a national park unit boundary is a viable option. However, this approach generally is used in the context of direct NPS management of other nearby land, and coordinated management among the agencies. NPS believes that this approach is not feasible at this time.

Public Concern: Sufficient land may be available to the NPS in the future. The area shouldn't be found infeasible based on current lack of willing sellers. Focus on the long-term prospects for federal involvement.

Comments included:

- Implementation of a NPS unit takes place over many years. Land may become available in the future. If the study area were a national park unit, the NPS would be able to act when land does become available. Land acquisition would occur over several years as with other national parks.
- Landowners and their willingness to sell to the NPS may change over time. There is a history of landowners being initially opposed to such protection efforts, but gradually becoming more interested in interacting with the NPS.
- A long-term preservation effort should not be found infeasible based on initial landowner reactions, especially as some NPS designations do not depend heavily on landowner participation.
- Although NPS involvement may not be feasible due to monetary restrictions from the current administration, have to look into the future decades to protect this stretch of coastline.

Response: The feasibility finding is based on the present time. NPS management is not feasible in the foreseeable future. Feasibility may change over time.

Public Concern: Security concerns at Vandenberg Air Force Base do not provide adequate justification for the finding of infeasibility.

Comments included:

- A national park unit could be designed to minimize security concerns at Vandenberg AFB.
- Park designation could include Vandenberg AFB but defer access and park management until the base is decommissioned to ensure future preservation instead of development.

Response: Vandenberg AFB is not a feasible component of a national park unit at this time because of security concerns. These security concerns would not preclude NPS designation in other parts of the study area. If Vandenberg AFB land is ever determined to be excess to their needs, national park designation could be considered at that time.

ACCESS AND PUBLIC ENJOYMENT POTENTIAL

Public Concern: NPS erroneously states that Bixby Ranch is closed to public access.

- Public access is available on the Bixby Ranch at Jalama Beach County Park. The county road that leads to this park crosses through the middle of Bixby Ranch. The land for the park was a donation. The park is situated so that direct public access along the sandy beach coastline across the Bixby Ranch is accommodated.

Response: Bixby Ranch has generously contributed to the public's access to the coast by donating land for Jalama Beach County Park. NPS is also aware that members of the public trespass onto Bixby Ranch land, particularly along the coast. Nevertheless, as most of the land that remains in Bixby Ranch is closed to the public, NPS believes their statement is correct (p. 69 of the draft study report): "Coastal access west of Gaviota State Park is very limited, due to large private land holdings closed to the public at Hollister, Western Gate and Bixby Ranches."

RESOURCE CONDITIONS AND THREATS

Public Concern: The study area should be found infeasible for national park designation because of fragility of the resources and safety issues.

Comments included:

- National park is infeasible because of degradation of fragile habitat - NPS will introduce the public to areas that are remote and private resulting in compromised agricultural viability, degradation of pristine open space, and loss of rare habitat.
- National park is infeasible because of safety issues - topography and geology, cliff drops, train travel on coastal edge, interference with agriculture and military security issues with Pt. Conception Lighthouse.

Response: NPS believes that there is additional potential for public enjoyment and public access along the Gaviota Coast without compromising resources, agricultural viability or security. The study report recognizes that additional access would be inappropriate in some areas due to resource sensitivity. Safety and security issues exist, but would not preclude public access and enjoyment in other appropriate areas.

Public Concern: The area is not a feasible national park addition because the types of resources found in the study area are available in existing state and national parks.

Response: This issue is addressed as part of "suitability" in the NPS study process (draft study report, p. 55-65). It is not part of "feasibility" as defined in NPS management policies.

Public Concern: Resource degradation and threats exist in the study area

Comments included:

- The status quo is not a successful model for conservation. Large projects such as Winchester Commons and Bacara Resort have been built. Development proposals at Tajiguas Ranch, Naples, and ARCO/Dos Pueblos properties could change the image of the Gaviota Coast.
- The portion of Gaviota Coast between the Goleta urban rural boundary line and El Capitan State Park is most threatened by urbanization and most of the land is for sale.
- Some of the lands for sale are owned by land speculators, not family farmers. These owners at one time or another have proposed development inconsistent with long-standing zoning restrictions.

- Development of Goleta combined with difficulties in maintaining farming present a severe threat for years to come. Thirty years from now the ranchers' land will be in the hands of the developers.
- The coast is not pristine. It includes: Tajiguas landfill; two large oil and gas refinery plants; three state parks and three county parks, including camping sites; the Hollister Ranch gated community of 100 acre ranchettes; VAFB missile launch sites, silos and satellite tracking stations, airport; Naples area development.

Response: These areas of degradation and threat are noted in the study report. However, they do not affect feasibility of a national park unit in this area as they would not preclude designation of a national park unit. Impacts and threats are also discussed in the Environmental Assessment section of the draft study report.

Public Concern: The study report conclusion that current land uses are degrading or threatening natural and cultural resources is erroneous and does not have a factual basis.

Comments included:

- Current land uses have remained unchanged for 30 years. This feasibility factor should be marked "no."
- The box for resource degradation and threats to resources should be changed to "No" for the Bixby Ranch.
- The threat to the resources is not private development of land; it is the demand for recreational expansion of the coast.

Response: This criterion for feasibility addresses whether impacts and threats to the resources are at a level that would preclude designation as a national park unit. NPS stands by their conclusion that the impacts and threats to the resources would not preclude designation as a national park unit. Impacts of current land uses are also addressed in Environmental Assessment section of the draft study report.

Public Concern: The NPS has concluded that the Gaviota Coast does not require any new NPS action because of the good stewardship of the landowners in the study area.

Response: The study report recognizes that the pastoral landscape of the Gaviota Coast has remained largely intact due to the stewardship of the private and public landowners in the study area. However, the feasibility determination was not based on an assessment of land stewardship; it was based on feasibility criteria outlined in the NPS management policies.

Public Concern: It is inappropriate to state that NPS could contribute to conservation of area's resources.

Comments included:

- Delete the text (half a sentence), "While NPS management, if feasible, could contribute to the conservation of the area's resources"
- The area's resources have been conserved for hundreds of years by private landowners and other agencies.

Response: NPS stands by their findings. As described in the Management Options section of the draft study report, if feasible, NPS management could contribute: funding for acquisition of land or easements from willing sellers, management of natural and cultural resources, education and interpretation, land and resource management, or technical assistance and cooperative projects with other landowners.

PUBLIC INTEREST AND SUPPORT

Public Concern: Study report does not recognize the strength of the support for NPS involvement, the common pattern of initial opposition to NPS when parks are proposed, or the undue influence of a vocal minority and their misinformation campaign.

Comments included:

- There is strong support among the general public to consider all types of assistance for the Gaviota Coast, including federal involvement. Support was even stronger prior to the anti-federal campaign.
- There is tremendous support for attracting federal funding to protect the Gaviota Coast. It will be virtually impossible to protect the Gaviota Coast without federal assistance.
- Proponents were able to achieve authorization of the study and prevail in lawsuits to block it.
- Not all property owners are against a National Seashore on the Gaviota Coast. Commenter owns property in the area and supports protecting the character of the area through a national seashore designation.
- Groups that support NPS designation can educate landowners, allaying their concerns about federal management.
- Cape Cod National Seashore initially met with the same opposition as the Gaviota Coast. Congress, NPS, local government, and residents worked to resolve concerns and establish a national seashore.
- Supportive and potentially cooperative landowners didn't, or won't, speak up because of intimidation from others who oppose NPS involvement.
- Wealthy landowners on the Gaviota Coast had the resources and political influence to run a campaign of misleading and inaccurate information to deter the general public from supporting federal involvement. Therefore, the NPS heard from a vocal minority that did not reflect the opinions of the general public.
- Finding of landowner opposition is based on inaccurate assumptions.
- Opposition of landowners has been fed by developers and investors who cause value of undeveloped land to skyrocket.

Response: The study report acknowledged the support for, as well as opposition to, NPS involvement.

Public Concern: Strong opposition from area landowners does not necessarily make it unlikely that effective NPS management could occur.

Response: The NPS stands by its conclusion that the strong landowner opposition to NPS involvement in the area is a contributing factor to the finding that NPS management is infeasible.

Public Concern: Opposition was broader than just landowners.

Comments included:

- Disagree that landowner opposition was a major reason for infeasibility. Other organizations and local governments were against NPS presence here.
- Local opposition came not just from study area property holders but also from the majority of surrounding communities concerned about: negative impacts of a national park at their doorstep; industrial tourism altering the desirable rural attributes of these communities; and the burdens on infrastructure.

Response: The National Park Service acknowledges that opposition to NPS involvement came from a broader group than local landowners. However, a significant basis for the NPS determination of infeasibility was the opposition of study area landowners.

Public Concern: National interests, rather than local, should drive NPS recommendations.

Comments included:

- Opposition from landowners should not affect feasibility. Long term national interests, not the concerns of a few vocal and affluent landowners, should drive NPS recommendations.

Response: NPS considers national as well as local and regional interests in determining feasibility.

Public Concern: Agree with NPS finding that national park unit is not feasible.

Comments included:

- The amount of land acquisition and its cost, cost to maintain and the degradation to the environment are reasons NPS is correct to say Gaviota Coast is not feasible.
- Agree that area is not feasible and NPS should not be involved in trying to establish any kind of national park. Encourage continuing and enhancing local efforts.
- Existing parks located in this area need your focus. Expanding the NPS into other areas appears absurd in light of county, state, and federal government problems at this time.
- The National Park Service should focus on the current maintenance backlog and visitor management issues. There is an estimated \$5 billion backlog in park repairs. Parks are understaffed with inadequate facilities and vandalism.
- It is feasible for the Gaviota Coast to mature without federal intervention.
- Agree with study conclusion that lack of willing sellers and lack of funds available to NPS to purchase land makes a national park designation on the Gaviota Coast inappropriate for foreseeable future.
- There are no landowners on the Gaviota Coast willing to sell to the NPS.

Response: Comments noted.

Public Concern: Disagree with NPS finding that national park unit is not feasible.

Comments included:

- Commenter recommends production of a final report based upon determinations that the area is a feasible addition to the national park system, that direct NPS management is clearly identified as the superior alternative, and explains why alternatives 1 and 2 are no longer being considered and why management options including NPS have been reinstated and were considered.
- Commenter's analysis of boundary size and configuration and public interest and support supports the determination of NPS management as financially and politically feasible. NPS could contribute significantly to the conservation of the Gaviota Coast study area resources, and in conjunction with contributions of other agencies and organizations, and continued private stewardship.
- A small minority of wealthy people benefit from finding of non-feasibility. Vast majority of Americans would benefit from a national seashore at Gaviota Coast.
- Commenter reluctantly accepts the feasibility conclusions.
- Commenter is sorry that the draft GCFS concluded with a recommendation that the management be done by entities and organizations other than the NPS.
- Disappointed by the finding of infeasibility of a national park/ seashore at Gaviota Coast. Findings were based on hostility of certain residents towards national park/ seashore and result of misinformation campaign.

Response: Comments noted.

COSTS

Public Concern: Study report underestimates the costs of land acquisition for a national park.

Comments included:

- Costs for land with development potential are significantly higher. Commenter's information supports costs of \$10,000 and over \$300,000 per acre for property with limited and significant development potential.
- The acquisition scenario failed to recognize the amount of severance damages that would have to be paid as additional costs of any acquisition within the study area.

Response: Land costs vary widely in this area, depending on location, development potential, size of parcel, and the goals of the sellers, among many other factors. The study report acknowledges that the land cost estimates used were very rough, and did not include many overhead costs. They were conservative estimates. However the NPS believes they are adequate to support the NPS conclusion that the costs of NPS involvement in the area are beyond the NPS capability at this time.

"Severance damages" can occur if properties are split ("severed") and the partial acquisition leaves the remainder property with impaired utility (loss of access, view, or some other valuable amenity) above and beyond the value of the part acquired. Such details related to land costs would only be examined if specific lands were proposed for acquisition. The purpose of estimating land costs in this study was to assess feasibility. Since no land is proposed for NPS acquisition, the estimates were very general.

Public Concern: Because of the high cost of land acquisition in this area, federal assistance is necessary.

Comments included:

- Developers are the only ones that can afford this area if put on the market.
- There are not enough local, state, private, or public funds, to save the amount of land on the Gaviota Coast. Therefore the federal government could play an important role.
- It would cost \$200 million to purchase land currently for sale on the Gaviota Coast.
- With the proposed Naples development on the Gaviota Coast and the sheer amount of land for sale at astronomical prices it will be nearly impossible for the environmental community to win every land use battle on the Gaviota Coast.

Response: The NPS has determined that it is not able to undertake new land acquisition and management responsibilities of this potential cost and magnitude at this time.

Public Concern: NPS management is financially feasible in the long term; the study report has drawn conclusions based only on the short term.

Comments included:

- Considering only the short-term priorities of the current presidential administration is inappropriate given the long time frame involved in implementing a unit of the NPS. Funding and management can be phased in over time.
- The United States government has significant financial resources including the Land and Water Conservation Fund. The Gaviota Coast should become a funding priority because of national significance and suitability.
- Despite maintenance backlog, there are still funds available to acquire new areas over the next years and decades.

Response: The NPS has long priority lists of projects waiting for funding for land acquisition, resource management, construction projects, park operations and other needs. NPS land acquisition is funded through the federal Land and Water Conservation Fund. Land acquisition funds available to the NPS are very limited and have declined in recent years. The NPS has determined that it is not able to undertake new land acquisition and management responsibilities of this potential cost and magnitude at this time.

Public Concern: NPS should allow Congress to determine its own financial priorities rather than eliminating consideration of alternatives on a cost basis.

Comments included:

- The national budget is the concern of Congress. Saving this significant space for the public is the concern of the NPS. Allow Congress to decide their priorities and determine feasibility.
- Congress authorized the feasibility study, and Congress should decide whether protecting the Gaviota Coast is a national priority. If the administration does not want to create a park unit, it is incumbent to work on this through Congress and not to subvert the professional work of the NPS.
- For 1/5 the price of a stealth bomber, all the land for sale on the Gaviota Coast could be protected today. Commenter asks that NPS forward all the alternatives possible for protecting the Gaviota Coast and allow Congressional representatives to decide their priorities and determine feasibility

Response: The law establishing the process for feasibility studies directs the NPS to consider costs associated with acquisition, development and operation, and to make a recommendation to Congress (refer to Appendix B: New Area Studies Act in the draft study report). The NPS has a responsibility to consider the impacts of new areas on existing park budgets. In the federal budgeting and appropriation process, the NPS is generally required to develop an overall operating budget within a given ceiling. New park authorizations generally don't increase the budget ceiling, and thus can contribute to budget shortfalls for other parks. The NPS has determined that it is not able to undertake new land acquisition and management responsibilities of this potential cost and magnitude at this time.

OTHER ALTERNATIVES

Public Concern: NPS did not adequately evaluate the potential for management of a national park unit through less costly partnership approaches.

Comments included:

- Approaches other than outright land acquisition were not examined.
- Discussion of cooperative partnership options could have overcome opposition from study area landowners.
- The goal of sustaining the agricultural and ranching heritage of the area can be accomplished by retaining private landownership and securing agricultural/conservation easements, buying development rights, and/or offering technical assistance and funding to support stewardship efforts.
- A park could have a land conservation strategy that includes a mix of land acquisition or conservation easements from willing sellers or special agreements with landowners.
- Cost issues can be addressed by NPS participation models which fully engage the private sector, NGOs and other levels of government (example: Highlands Stewardship Area in the northeast).
- NPS states that costs could be relatively moderate for a National Reserve or other limited designation, if combined with substantial financial commitments from local, state and private partners.

Response: Cooperative partnership options were discussed early in the study process; however, they were found to be infeasible for the NPS, and are presented in the "Management Options" section of the study report. Easements and partnerships are very valuable conservation tools, currently in use in the Gaviota Coast and in many national park units. They provide a way to share the costs of conservation; however, they are

not necessarily low cost. Easements often cost nearly as much as fee acquisition. The NPS has determined that it is not able at this time to undertake new land acquisition and management responsibilities of the cost and magnitude that would be required to ensure sustainable resource protection and visitor enjoyment in this area.

Public Concern: Request that NPS evaluate the potential for a national seashore between the Goleta urban boundary and El Capitan State Park, below Hwy 101.

Comments included:

- This portion of the Gaviota Coast is most threatened by urbanization and most of the land is for sale.
- It includes the last six miles of contiguous, relatively unprotected coastal open space in Southern California. It includes nationally significant biological, cultural, historical, scenic, and recreational resources.
- It would be a manageable and relatively affordable addition to the National Park System.
- Request NPS analyze the feasibility of such a park if the land were conserved with private funds and then donated to NPS.
- Landowners would not object to this smaller, privately financed seashore.

Response: The NPS has discretion in how to approach development of alternatives. The NPS evaluated a range of NPS management alternatives, including relatively limited coastal seashore that is similar to this proposal, before determining that such options were not feasible at this time. If land were donated to the NPS, funding for park management would still need to be found.

Public Concern: Request that the NPS consider an alternative with federal dollars devoted to local management strategies.

Comments included:

- Board of transfer could be established to review and approve proposals for purchase of easements, to alleviate development pressures and implement other protective measures.
- Is it feasible for NPS to aid local acquisition?

Response: Local land conservation interests could pursue federal dollars for local management of the Gaviota Coast. However, obtaining such funding is extremely difficult, other than through established funding programs, many of which are listed in Alternatives 1 or 2. The only NPS funding which could be used for local land acquisition is that state allocated portion of the Land and Water Conservation Fund, which is administered through California State Parks, and which has very limited funding.

Public Concern: The NPS failed to consider “affiliated area” status for the Gaviota Coast.

Comments included:

- The NPS policies state that the NPS may recommend an alternative status, such as “affiliated area” in cases where a study area’s resources meet the criteria for national significance but do not meet other criteria for inclusion in the NPS. (*Management Policies*, section 1.3.4).
- The Gaviota Coast meets all the criteria for an affiliated area; therefore the study should be revised to include this option.

Response: The NPS has the option of recommending an affiliated area or other alternative status when an area 1) is nationally significant, 2) requires special recognition or assistance beyond what is available through existing NPS programs, 3) is managed in accordance with the policies and standards of the national park system, and 4) is assured of sustained resource protection, as through a formal agreement between the NPS and the management entity. (NPS Management Policies, section 1.3.4). Affiliated area status was considered,

however, the NPS believes that criteria 3 and 4 (above) cannot be met due to strong opposition to NPS involvement expressed by study area landowners and other residents of the region.

PROCESS AND CRITERIA

Public Concern: The NPS could make a conditional finding of feasibility.

Comments included:

- Rather than making a finding of infeasibility, the study could make a conditional finding of feasibility, as directed in NPS *Management Policies*.
- This would be consistent with a more long-term approach by keeping the option for NPS management open if certain conditions are met (e.g. a critical mass of landowners express interest in selling to the NPS).

Response: NPS management policies do allow for feasibility evaluations to identify concerns or conditions, rather than simply reach a “yes” or “no” conclusion. However, the NPS has discretion in how it makes its feasibility determinations, and the NPS stands by its determination.

Public Concern: The study team bowed to political pressure in feasibility determination

Comments included:

- While the study found protection was justified on all biological and ecological grounds, it found designation not feasible on economic grounds alone. This sends a message that the NPS and DOI lack the motivation and political will to prioritize the allocation of resources to fulfill the findings of the study.
- Feasibility decision appears to be a politically influenced decision. Embarrassed that the NPS regional office is following the administration's ideological opposition to federal land protection. The study team allowed local opposition, their Washington lobbyists, and transient Executive Office agendas to manipulate their decision concerning the feasibility of National Park Service designation.

Response: The feasibility determination, as established by Congress, is partly a political determination. It includes consideration of such politically-related factors as costs, socioeconomic impacts, the level of local and general public support, and any other information which the Secretary of the Interior deems to be relevant.

Public Concern: Accurate conclusions regarding feasibility cannot be made without a full environmental impact statement (EIS).

Response: The NPS believes that the feasibility study and environmental assessment (EA) provide NPS with adequate information to support the feasibility determination. The draft study report includes a full analysis of the feasibility criteria (pages 68-74). An EIS, similar to the EA, would evaluate the impacts only of those alternatives found feasible in the draft study report. NPS policy does not require an EIS when no NPS management is considered under any of the alternatives.

Public Concern: NPS and DOI have a duty to the public to conserve and protect the Gaviota Coast.

Comments included:

- Feasibility shouldn't be the "wheel that this effort turns on." NPS and DOI have a duty to the public to conserve and protect this unique and significant area.

- Study was not accurately written because the Gaviota Coast needs to be protected. Although it is not feasible currently, it will be in the near future.
- Given the value of the Gaviota Coast and people's general agreement to protect it, isn't this area an exception to the administration's current policy to maintain existing units?

Response: NPS is charged with evaluating the Gaviota Coast for potential national park service designation. An area has to meet all four criteria for inclusion in the National Park System including feasibility in order to receive a favorable recommendation. The NPS does not have the resources to conserve every area that is nationally significant, nor is the NPS the best manager for all nationally significant resources.

Public Concern: Need to find a feasible way to protect the Gaviota Coast.

Comments included:

- Commenter hopes that this recommendation might change in the future regarding federal funding and management.
- It is clear that there is a need to find a way to protect and maintain this area.
- Reconsider national park feasibility in the near future. Newsletters and worksheets encouraged commenter that NPS could play a role.
- If feasibility is not available then community must find some way to make it feasible instead of just giving up on the environment.

Response: Comments noted.

ALTERNATIVES AND ENVIRONMENTAL CONSEQUENCES

The majority of comments received during the public comment period were related to the alternatives and their potential impacts. Many of these were opinions either agreeing or disagreeing with either Alternative 1 or Alternative 2. The range of substantive comments includes the following topics:

- *Adequacy of current protection of the Gaviota Coast.*
 - *Suggestions for additional programs for either alternative 1 or alternative 2.*
 - *Requests for the consideration and development of additional alternatives and alternatives that include NPS involvement.*
 - *Concerns regarding additional regulation or NPS involvement in the study area.*
 - *Concerns regarding options for increasing public access under Alternative 2.*
 - *Concerns regarding various impacts that would result from either alternative and adequacy of the environmental analysis.*
 - *Concerns regarding the environmentally-preferred alternative.*
-

ALTERNATIVE 1

CURRENT PROTECTION OF THE GAVIOTA COAST IS ADEQUATE.

Public Concern: Current state and local policies, conservation programs, and regulations are adequate to protect the Gaviota Coast.

Comments included:

- Santa Barbara County is one of the most heavily regulated counties in the nation.
- The federal government already owns and manages the majority of the land, including Los Padres National Forest and Vandenberg Air Force Base, leaving only 75,000 acres in private ownership. There are state and county parks.
- Overlapping policies, including the Coastal Commission and Santa Barbara County regulations, have created a highly restrictive regulatory framework.
- Nonprofits are working to conserve land here (e.g. Friends of Ellwood and Trust for Public Land).
- No housing units of the 17,000 required by the state are proposed for the study area.
- Most of the properties on the Gaviota Coast that could be developed are already conserved through the Williamson Act agreements with landowners, precluding development.
- Zoning changes are unlikely, the urban rural boundary line has remained unbreached for 20 years and no subdivisions have occurred on Gaviota Coast land for over 30 years.
- Landowners have taken good care of the land and can currently do nothing with the land.
- Vandenberg AFB has already purchased the development rights to the land on the Gaviota Coast immediately south of the Vandenberg AFB.
- Naples is the only development project on the entire Gaviota Coast and is used as the hammer to scare everyone into believing that's what's going to happen to the rest of the land.
- The proposed Dos Pueblos golf course is no longer an issue and perceived threats of ranchettes are also unfounded. If every legal parcel were issued a building permit, the number may total at most 100 homes.
- Under existing regulations and laws in the coastal zone, protection of fragile coastal resources has priority over access.
- Existing policies applicable to new development mitigate against significant aesthetic impacts. Scenic resources are protected fully under existing policies and programs.

Response: The current mix of conservation actions, while largely effective to date, are subject to changes in the economy, political leadership, and the desires of individual landowners. While local agricultural zoning provides a framework for continuation of agricultural uses, it is also vulnerable to changes to residential or other development. In the study area, including western Goleta, there have been approximately 40 zoning changes over the past two decades. Changes include upzoning, downzoning, and the application of special overlay districts (Environmental Assessment, page 127)

Proposals for non-agricultural uses of agricultural land have surfaced from time to time, and have been controversial, well-funded, and hard-fought. Changes in the Board of Supervisors or Coastal Commission could result in governing bodies that would approve such proposals.

Under Alternative 1, with limited funding available for conservation, population and growth pressures may result in long-term impacts to important resources, habitat fragmentation and an eventual degradation of the study area's species diversity. The eastern portion of the study area would be the most affected. (Environmental Assessment, page 165). Alternative 2 supports further local protection through expanded use of existing local, state and federal programs.

Public Concern: The land within the project area north of the Vandenberg AFB cannot be developed because there is no water, no access, and due to the steep terrain, there are no suitable building sites.

Response: It is not clear what area the comment is referring to. The only land within the study area north of the Vandenberg AFB is Point Sal.

Public Concern: Current State law and county policies and regulations already provide adequate protection for cultural and archeological resources. Most historic sites are currently under the protection of several other entities.

Response: While some cultural and archeological resources are protected through public or private stewardship, others have not been studied, evaluated, or listed on the National Register of Historic Places. Without more complete records of the location, characteristics and significance of cultural and archeological resources, they are at risk of inadvertent or intentional destruction by activities such as grading and construction (see Environmental Assessment, p. 140-143).

CURRENT PROTECTION OF THE GAVIOTA COAST IS NOT ADEQUATE.

Public Concern: The study area would not be protected under Alternative 1.

Comments included:

- Alternative 1 would lead to the destruction of the Gaviota Coast as an intact ecosystem and loss of cultural resources. The history of the Santa Barbara Coast is one of continual development proposals. If the Board of Supervisors were to weaken, Gaviota Coast could easily be developed as coastal Orange County.
- Development is gradually creeping north from the City of Goleta. It won't be long before developers take advantage of the situation.
- Those who argue that there is no development threat in the region are referring to the western end of the study area. They neglect to acknowledge pending development in the coastal stretch from El Capitan to Ellwood. Most of this land is for sale with full build-out in mind. This land contains historical, biological, scenic, cultural, and recreational resources.
- Farmers cannot pay millions of dollars to grow avocados on prime beach property.

- While the proposed golf course at the former Arco property was finally defeated by the Coastal Commission, many property owners did not oppose it, despite the fact that its impacts would have been similar to those that the property owners raise against any NPS proposal.
- High land prices are foreshadowing the decay of this habitat and landscape. As the rich get richer, the rest of us have less room to recreate, find solitude and teach our kids about nature.
- Alternative 1 fails to address the likely housing increases and pressures outside the urban area with corresponding burdens on government budgets and pressure for additional tax revenue – for example, state housing mandates.
- The likely fate of the coast is sprawl, which will lead to the inevitable degradation of natural, agricultural, and scenic resources.

Response: The draft study report found that under Alternative 1, population and growth pressures may result in long-term impacts on significant resources.

Public Concern: The study's assumption that protection activities would continue at about the same level of activity under Alternative 1 is disputable:

Comments included:

- While stewardship by private landowners has historically protected much of the Gaviota Coast, over \$200 million in real estate is now for sale on the Gaviota Coast.
- Owners of over 500 acres of land have recently cancelled their Williamson Act contracts, indicating an interest in developing land in the future. While some landowners are interested in long-term preservation, others are pursuing sale and subdivision of their land. As property values rise, pressure to sell or develop will also rise.
- Many property owners on the Gaviota Coast claim that they would like to keep their land in agriculture, however they cannot afford to restrict their land to agriculture permanently.
- Farmers and ranchers often cite estate taxes or lack of interest by their children in pursuing an agriculture way of life. Therefore, the study should be revised to assume that these pressures would cause the level of private land stewardship to decrease under Alternative 1.
- The suspension of funding for the California Natural Heritage Preservation Tax Credit Act for 2002-2003, as well as recent attempts by the State to cut subvention funding for Williamson Act contracts indicates that funding levels could decrease.
- The current campaign to protect the Ellwood Mesa on the eastern edge of the study area demonstrates the high cost of conservation on the Gaviota Coast.
- Local policies and zoning ordinances do not provide permanent protection, since they may be changed by the Board of Supervisors. As development pressures increase, the likelihood that properties will be subdivided or allowed to develop uses that are growth inducing and inconsistent with the rural nature of the Gaviota Coast will also increase.
- The Gaviota Coast is threatened by the development of "fraction" lots which are small lots that are not accounted for in the county's General Plan or community plans. Property owners and development agents have been attempting to find these fraction lots on Gaviota Coast properties in order to create developable lots without going through the subdivision process, and have challenged the county's efforts to limit development of such lots.
- The California Coastal Commission has been the subject of lawsuits and legislation with the purpose of dismantling the Commission or severely limiting the ability of the state and local governments to protect coastal resources.

Response: Alternative 1 is the "no action" alternative for this study, and is used as a baseline against which to evaluate other alternatives. Presentation of a "no action" alternative is required under NEPA [40CFR § 1502.14(d)] and per departmental and agency directives. Additional guidance from the Council on Environmental Quality states that "'no action' is 'no change' from current management direction of level of management intensity," and "the "no action" alternative may be thought of in terms of continuing with the present course of action until that action is changed." (Federal Register, v. 46, no. 55, p. 18027, 3/23/1981).

Alternative 1 therefore assumes that current programs and policies would remain in place, and current conditions and trends would continue.

ALTERNATIVE 1 SHOULD BE MORE DYNAMIC.

Public Concern: Alternative 1 has been made artificially static. Existing controls are dynamic and quite capable of adjusting to keep the area undeveloped.

Response: Alternative 1 is the “no action” alternative for this study, and is used as a baseline against which to evaluate other alternatives. Presentation of a “no action” alternative is required under NEPA [40CFR § 1502.14(d)]. Additional guidance from the Council on Environmental Quality states that “‘no action’ is ‘no change’ from current management direction of level of management intensity,” and “the “no action” alternative may be thought of in terms of continuing with the present course of action until that action is changed.” (Federal Register, v. 46, no. 55, p. 18027, 3/23/1981). Alternative 1 therefore assumes that current programs and policies would remain in place, and current conditions and trends would continue. It does not attempt to predict the implementation of future programs and policies. Alternative 1 therefore includes only the existing programs that are most actively being used to protect land or significant resources within the study area.

ALTERNATIVE 1 DOES NOT INCLUDE ALL EXISTING PROGRAMS.

Public Concern: The NPS did not include all existing programs and funding sources under Alternative 1.

Response: The description of Alternative 1 or “no action” does not attempt to describe every program, law or policy existing under current conditions. Rather, Alternative 1 includes only the existing programs that are most actively being used to protect land or significant resources within the study area, thus forming a baseline for current protection efforts. Establishing a baseline is critical to evaluating proposed alternatives.

Some programs that are currently available to the community are not well utilized. Other programs have been proposed or discussed, but are not yet established. Because these programs are not being implemented at this time, several were included under Alternative 2 as a way to analyze their potential effectiveness if fully implemented or utilized within the study area.

The programs included in this category of public concern are numerous. These programs have been grouped by response into the following subcategories and include further explanation under the response column:

Public Concern: The NPS did not include all existing programs and funding sources under Alternative 1.	
Group 1: Programs already included in Alternative 1.	<u>General Response to Group 1 Programs:</u> The following programs suggested for inclusion under Alternative 1 are already included in Alternative 1 or analyzed as an existing program in the Environmental Assessment. The explanations below indicate how the draft study report addressed each program:
California Coastal Trail Program: At least \$5 million shall be expended on the completion of the Coastal Trail.	This program is described under Alternative 1 on page 92 of the draft study report. The NPS has revised the draft text to include the funding levels

Public Concern: The NPS did not include all existing programs and funding sources under Alternative 1.	
	associated with this program at the State level.
Land Resources Protection (California Department of Conservation).	The programs within the Division of Land Resources Protection (Williamson Act, Resource Conservation District Program, and the California Farmland Conservancy Program) are described in the draft study and analyzed in the EA.
Soil Conservation Fund.	The NPS assumes that this comment refers to the Soil and Water Conservation Assistance Programs offered by the Natural Resource Conservation Service. These programs are described on page 88 of the study report.-
Safe Neighborhood, Clean Water, Air, and Coastal Protection Bond Act of 2000 (Proposition 12) Water Quality, Supply and Safe Drinking Water Projects, Coastal Wetlands Purchase and Protection. (Proposition 50).	The draft study report acknowledges bond acts as a funding source for resource conservation on page 87 of the study report. The NPS has revised the draft text to include details on funding levels.
Wetland Restoration and Acquisition.	The draft study report describes projects funded by the Coastal Conservancy's Southern California Wetlands Recovery Project on page 90.
State Coastal Programs.	The California Coastal Conservancy, the California Coastal Commission, and the Santa Barbara County Local Coastal Plan are included on page 90 of the draft study report.
Coastal Zone Management Act.	Acknowledged in the Environmental Assessment as part of the existing regulatory framework.
Williamson Act.	Discussed on page 87 of the draft study report.
Natural Heritage Preservation Tax Credit.	Discussed on page 86 of the draft study report.
Grassland Protection Program.	Unclear if this refers to the USDA Grassland Reserve Program or the newly established state program. The USDA program has been previously discussed in Alternative 1, page 88. NPS has added information on the newly adopted state program (see errata section).
Recreational Grants.	The main source of recreational grants in California is the Land and Water Conservation Fund. Such grants have not been applied to the study area.
California Environmental Quality Act (CEQA).	This is acknowledged in the Environmental Assessment under the current regulatory framework (page 114). CEQA is an assessment tool. While significant impacts must be identified under CEQA, it does not provide coordinated resource management on the Gaviota Coast, regulate land use, or directly contribute funding for long-term land conservation.
Santa Barbara County Comprehensive Plan and Zoning Ordinance.	Discussed on pages 88-89 of the draft study report.
Cachuma Resource Conservation District (RCD).	Discussed on page 89 of the draft study report.
Existing easements	Discussed under Alternative 1 on pages 86-87 of the draft study report.

Public Concern: The NPS did not include all existing programs and funding sources under Alternative 1.	
The Subdivision Map Act.	This Act applies to all counties throughout California to regulate subdivisions. This is a broad power that can be implemented according to local concerns. The Environmental Assessment includes a discussion of the Santa Barbara Count Lot Line Compliance Program as this applies more directly toward the protection of resources in the Gaviota Coast study area.
Project Clean Water.	Discussed in the Environmental Assessment as an existing program. This program is mostly focused on watersheds outside of the study area.
Coal Oil Point Preserve Enhancement Projects.	Described on page 90 of the draft study report.
Hollister Ranch.	The Cooperative grazing program and enrollment in the Agricultural Preserve are recognized on page 85 of the draft study report.
Minerals Management Service.	Discussed on page 91 of the draft study report.
Group 2: Informational / research programs.	<p><u>General Response to Group 2 Programs:</u></p> <p>The following programs or resources suggested for inclusion in Alternative 1 were not included because they are informational or research programs that do not directly protect resources through funding or regulations. It should be noted that many of these resources are important sources of information for policy making decisions regarding resource protection. NPS used several of the following programs to acquire resource information for the draft study report. The explanations below indicate how those programs were used:</p>
Donald Bren School of Environmental Science and Management (University of California, Santa Barbara).	
Gaviota Coast Resources Study (prepared by the County of Santa Barbara).	
California Legacy Project (Research project run by the State of California's Resources Agency)	
California Sea Grant Program (University of California research program)	
California Environmental Resources Evaluation System (CERES). Database for environmental information in California.	NPS used this database in researching study area resources.
Agricultural/Open Space Mapping. Conducted by various universities, local, state and federal resource agencies.	The NPS used such information in compiling agricultural information.

Public Concern: The NPS did not include all existing programs and funding sources under Alternative 1.

Group 3: Programs not implemented at the time the study was drafted.	<p><u>General Response to Group 3 Programs:</u></p> <p>The following programs proposed at the time the study was drafted were not being implemented, and therefore, were not included in Alternative 1 with the exception of the Joint Proposal for the Ellwood Mesa Devereux Area as indicated below:</p>
California Rangeland Trust partnership with the Land Trust for Santa Barbara County.	
Joint Proposal for the Ellwood Mesa Devereux Area.	Discussed under Alternative 2.
Rural Resource Protection Program.	
Oak Tree Protection Program.	
2003 Housing Element Update.	
Group 4: Programs not actively in use for conservation in the study area.	<p><u>General Response to Group 4 Programs:</u></p> <p>The following programs, organizations or departments were not included because they are not actively being applied towards the long-term conservation of significant resources in the study area. Further explanation is indicated below:</p>
California Department of Forestry and Fire Protection.	The California Department of Forestry (CDF) has jurisdiction over fire management within study area; however, it does not directly manage land. The Santa Barbara County Fire Department administers CDF's Vegetation Management Program. The primary goal of this cost-share program is to encourage the use of prescribed burning to control vegetation that fuels wildfires. Permits are required through the County Fire Department.
American Land Conservancy.	Not currently active in the study area.
Group 5: Funding sources.	<p><u>General Response to Group 5 Funding Sources:</u></p> <p>Funding sources that were not included because the funding source 1) has historically not been used for protection of Gaviota Coast resources, 2) is highly competitive and would provide limited value towards the coordinated protection of resources on the Gaviota Coast, 3) cannot be applied directly to conservation goals identified for the study, 4) is too general to assess its impact on study area resources, or 5) provides funding to programs already discussed in the draft study report.</p>
Federal Trust Fund Collins-Dugan California Conservation Corps	

Public Concern: The NPS did not include all existing programs and funding sources under Alternative 1.

<p>Reimbursement Account. Supports the Conservation Corps, a program where youth work on environmental restoration projects</p> <p>California Conservation Corps and funding sources including Public Building Construction</p> <p>Glass Processing Fee Account</p> <p>Penalty Account/Beverage Container Recycling Fund</p> <p>Environmental License Plate Fees: Provides funds to the California Beach and Coastal Enhancement Account</p> <p>Tidelands Oil Program</p> <p>Tobacco/cigarette Tax Program</p> <p>Petroleum Violation Escrow Account</p> <p>Beverage Container Recycling Fund</p> <p>Bi-metal processing fees</p> <p>Forest Resources Improvement Fund</p> <p>California Hazardous Liquid Pipeline Safety Fund</p> <p>Exotic Species Control Fund</p> <p>Land Bank Fund</p> <p>Oil Spill Prevention and Administration</p> <p>Fish and Game fines and penalties</p> <p>Salmon/Steelhead Restoration Account</p> <p>Marine Life, Reserve Management Account</p> <p>Environmental Enhancement Fund</p> <p>Coastal Watershed Salmon Habitat Sub-account</p> <p>Lifetime License Trust Account</p> <p>National Resource Infrastructure Fund</p> <p>Oak Woodlands Conservation Fund</p> <p>Motor Vehicle Fuel Account/ Transportation Tax Fund (Watercraft Fund)</p> <p>California Wildlife Coastal and Park Land Conservation Fund of 1988 (Proposition 70) Disaster Relief Grants</p> <p>Special Deposit Trust Fund</p> <p>Fish and Game Preservation Fund – licenses, tag and stamps</p> <p>Sales and rental of state properties</p> <p>Harbors and water craft Revolving Fund</p> <p>California Waterfowl Habitat Preservation Account/ Fish and Game Preservation Fund</p> <p>Fish and Wildlife Pollution Account</p> <p>Native Species Conservation and</p>	
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Public Concern: The NPS did not include all existing programs and funding sources under Alternative 1.

Enhancement Account Inland Wetlands Conservation Fund Renewable Resource Enhancement Program OHV (Overhead Valve engines) Grants State Historical Preservation Grants State Habitat Conservation Fund	
Group 6: Programs / projects that were added to the report in the errata.	<p><u>General Response to Group 6 Programs / Projects:</u></p> <p>The NPS agrees that the following programs / projects should be added to Alternative 1 or the Environmental Assessment. The draft study will be revised to include these programs. The descriptions below indicate how the draft study report has been revised to include these programs:</p>
Coastal Resource Enhancement Fund. Coastal Access Implementation Plan. Coastal Impact Assistance Program. State Resources Agency's Coastal Resource Grant Program.	<p>Conservation projects funded by these programs are identified in Alternative 1. The NPS has revised the study text to include specifics on these programs given that they have contributed substantially towards conservation of significant resources.</p>
Snowy Plover and beach access.	<p>The NPS has revised the draft study report to include a discussion of western snowy plover and restricted access on Coal Oil Point under Alternative 1, section 5, "Regulatory and Incentive Programs."</p>

PUBLIC LAND MANAGEMENT.

Public Concern: The ability of local and state agencies to adequately protect Gaviota Coast's resources for public use is in doubt due to budget constraints. For instance, State Parks recently had to close public access and decline to undertake management of a new 2,500-acre addition to the State Parks system and El Capitan Canyon due to budget constraints.

Response: The draft study report acknowledges that current economic conditions limit the potential in the near term for increased local, state, and federal funding for conservation and recreation. Some initiatives may not be financially feasible in the near term, while others may require more creative approaches to funding.

Public Concern: Federal and state parks are understaffed, with inadequate facilities and management.

Comments included:

- State Parks has done terrible job at Gaviota State Beach. Why not use money to improve existing parks such as Gaviota, El Capitan and Refugio?

- There are negative examples of over-resting rangeland at Gaviota State Park. This includes noxious weeds, erosion levels, and invasive species. This is in contrast to the stewardship of surrounding land by private management.

Response: Alternative 2 suggests enhancements to state and county park systems and programs (p. 100-103 of the draft study report).

Public Concern: The Los Padres NF recently released a proposal to identify and lease lands for exploration, development and production of oil and gas resources. Oil and gas leasing on forest lands on the Gaviota Coast would be detrimental to protection efforts.

Response: The Los Padres NF has been working on an oil and gas environmental impact statement for the past 9 or 10 years for the entire forest. None of the areas under consideration for oil and gas leasing are within the Gaviota Coast study area.

OTHER COMMENTS ON ALTERNATIVE 1.

Public Concern: NPS found Alternative 1 to be inadequate in the first newsletter. Alternative 1 was later reintroduced under the direction of the Department of the Interior.

Response: Alternative 1, the no action alternative, is required by the National Environmental Policy Act. There was never any consideration of not including this alternative in the study report. The newsletter referred to by the comment was Newsletter #4, *Protection Strategies Worksheet*. In Newsletter #5, the NPS clarified: "This statement was made based on the observation by the study team that the current land use regulations, while largely effective to date, are subject to changes in the economy, political leadership, and the desires of individual landowners. However, the phrasing may have been interpreted as a prejudgment of the study's outcome. As clarification, Alternative 1, 'Current Programs and Policies,' will be presented and fully analyzed as a relevant alternative."

Public Concern: The county's Agricultural Preserve Uniform Rules described under Alternative 1 are the implementation tool for the Williamson Act Program. This would be more correctly classified under the "Regulatory Incentives and Programs" section.

Response: The NPS revised the draft study report to identify the Uniform Rules as a regulatory program.

Public Concern: The NPS did not acknowledge current programs at Vandenberg Air Force Base.

Comments included:

- Vandenberg AFB has a 21-year partnership in the preservation of cultural and natural resources within the base, archeological surveys, and funding for cultural resources.
- Vandenberg AFB has won awards for environmental protection and conservation and continues to maintain balance between base procedures and the environment without the general public wandering about, or additional constraints or regulations that would jeopardize base security and effectiveness.

Response: NPS acknowledges the cultural and natural resource management programs at Vandenberg AFB throughout the draft study. Vandenberg AFB staff provided extensive resource information, collected during various resource inventories and surveys, to the NPS for the draft study report.

Information regarding public access opportunities on Vandenberg AFB was taken from the Vandenberg AFB Integrated Natural Resource Management Plan. Vandenberg AFB staff reviewed NPS's description of such programs during the development of the draft study report. Suggestions for expanding and enhancing public access under Alternative 2 would only be implemented at the discretion of the U.S. Air Force.

Public Concern: Support Alternative 1 to protect the Gaviota Coast.

Comments included:

- Of the two alternatives recommended by the NPS, only the no action alternative will ensure that landowners keep their land and will not lose control to the NPS.
- Alternative 1 is the only option with significant support from all community sectors.

Response: The draft study report does not propose NPS involvement in either of the two alternatives. NPS involvement in the study area is the same under Alternative 2, as it is under Alternative 1, the "no action alternative."

The NPS has received a wide range of divergent comments from many sectors of the local community. The range of comments includes support for Alternative 1, Alternative 2, and National Park Service designation. None of the proposals discussed in the study received support from all community sectors.

ALTERNATIVE 2

Public Concern: Support Alternative 2. Support is primarily related to a desire for more conservation of study area resources.

Comments included:

- Alternative 2 provides additional opportunities for long-term sustainable management, locally-initiated environmental stewardship, and conservation of nationally significant resources.
- Alternative 2 is more consistent with the goals development by the study team based on public input.
- Support Alternative 2 only if no NPS alternatives are considered.
- Support Alternative 2 including viewshed and watershed protection.
- A combination of these strategies is necessary to provide the level of protection needed to adequately preserve the Gaviota Coast.
- Support Alternative 2 with an increased role for California State Parks.
- Endorse Alternative 2 to protect the coastal land between El Capitan State Park and the Urban Rural Boundary Line.
- Alternative 2 would achieve more protection for open space and agricultural land by helping prevent housing sprawl beyond the rural urban limit line.
- Alternative 2 offers better protection of ecological and cultural resources for a longer period than Alternative 1.

Response: Comment noted.

Public Concern: Oppose Alternative 2. Opposition is primarily related to unwanted additional regulation, federal involvement or NPS involvement.

Comments included:

- Alternative 2 would leave open the possibility of future involvement by the National Park Service including viewshed protection, watershed regulation as well as Heritage Area Zoning, with impacts on private property rights.
- Alternative 2 would allow unnecessary federal involvement.
- There is no need for the NPS to be empowered to impose “Enhanced State and Local Management” in Santa Barbara County.
- Farmers in the study area fear that NPS involvement will run them off their land.
- Alternative 2 endorses a top-down management approach that would lead to loss of local control.
- Community needs empowerment, not threats.
- Alternative 2 as the preferred alternative would ensure failure rather than success; this is due to lack of consensus that exists in Santa Barbara County and policies of NPS that focus on preservation of land instead of agricultural operations.
- There is already too much regulation.

Response: The study report does not propose NPS involvement in either of the two alternatives. The NPS involvement in the study area is the same under Alternative 2, as it is under Alternative 1, the “no action alternative.” Alternative 2 does not prescribe any particular action, but provides a menu of ideas that could be acted upon by local landowners, non-profit organizations, and government organizations, if they choose to do so. The decisions regarding which local initiatives to pursue are left to the local community, where conservation goals can be determined, priorities can be set and costs and benefits can be fully analyzed.

Text has been changed in various places in Alternative 2 to clarify the voluntary and local-control nature of this alternative.

Public Concern: Alternative 2 recommends tightening the range of permitted uses under conditional use permits for agriculturally zoned land. Uses not consistent with adjacent land use and agriculture have never been, are unlikely to ever be, approved within the study.

Response: The county regulations for agriculturally zoned land allow the construction of recreational facilities and golf courses under a conditional use permit. Agricultural land has also been subdivided into large, rural residential estates where agriculture is a secondary use (Environmental Assessment, p. 127).

Proposals for non-agricultural uses of agricultural land have surfaced from time to time, and have been controversial, well-funded, and hard-fought. Changes in the Board of Supervisors or Coastal Commission could result in governing bodies that would approve such proposals.

Public Concern: Santa Barbara County has studied Transfer of Development Rights (TDR) programs for many years each time rejecting it for a lack of receiving sites that provide comparable value. TDR programs have been a failure in virtually every community within the State.

Response: The draft study report acknowledges that TDR programs are challenging to establish and administer (p. 99 of the draft study report). They have achieved varying degrees of effects in communities across the nation. In combination with other growth management tools, TDR programs can successfully contribute to the preservation of agricultural land. Successful implementation requires programs to be closely tailored to meet conservation goals, local conditions, and existing market forces. According to the American Farmland Trust, Marin County, California has protected 670 acres through its TDR program to date. Whether or not to implement a TDR program in Santa Barbara County would continue to be a local decision.

Public Concern: The State’s effectiveness to protect the Gaviota Coast is limited until the release of *The California Continuing Resource Investment Project (CCRISP)* in 2006-2007. In addition, the

State's revised Environmental Goals and Policy Report to be released in December 2003 is expected to set some criteria and guidelines for local planning agencies.

Response: The NPS recognizes that additional information and planning processes will continue to impact conservation actions on the Gaviota Coast.

Public Concern: The sites suggested for potential trail development under Alternative 2 could have the support of most landowners if purchased at full market value on a voluntary basis (old Arco site, Las Varas Ranch, Naples, Gaviota oil and gas processing facility, and Pt. Sal.)

Response: Comment noted.

Public Concern: Commenter is opposed to another marine sanctuary along the Central Coast.

Response: Comment noted.

Public Concern: Watershed management implications extend beyond the boundaries of the study area to include the entire Santa Ynez River watershed. Not depicting this is disingenuous.

Response: The draft study report acknowledges that "the watersheds on the Vandenberg AFB extend beyond the boundary of the base" (Environmental Assessment, p. 155). It also describes the impacts associated with Vandenberg AFB activities and those activities outside the base. The draft study report does not include a proposal for management of the Santa Ynez watershed. Programs at Vandenberg AFB and in Santa Ynez already exist.

Public Concern: The use of the word "enhanced" is not defined in the study document.

Response: By "enhanced state and local management," the NPS means to encourage the local community to consider additional tools and funding sources that conserve resources (natural, cultural and agricultural) and provide opportunities for public enjoyment.

Public Concern: More is needed from the NPS on the specifics of mechanisms in Alternative 2. Can successful models to follow be referenced? Give examples that would work on a practical basis.

Response: Many of the recommendations in Alternative 2 are suggestions for better utilization of existing conservation tools and funding sources. Of the new programs suggested (TDR, Land Conservancy or Open Space District), there are many case studies and examples of communities that have achieved successful implementation. While detailed case studies are beyond the scope of this draft study report, a few examples are cited on pp. 97, 98, 100 and 130 of the draft study report, such as:

- Sonoma County Agricultural Preservation and Open Space District. Similar to Santa Barbara County, this is a coastal county where agriculture is a primary land use. Sonoma County established an open space district that makes agricultural land conservation a priority while providing limited public access. Of the 27,000 acres acquired (mostly easements), only 1% is open to public access.
- The Coachella Valley Mountains Conservancy is a state regional land conservancy that protects land through a balance of easements and land acquisition.

- Marin County, California has protected 670 acres of agricultural land using a Transfer of Development Rights program.

Public Concern: The NPS includes programs and policies in Alternative 2 that would be more correctly classified under Alternative 1.

Response: Alternative 1 assumes that current programs and policies would remain in place, and that current conditions and trends would continue. Alternative 2 includes potential new programs, programs that are currently available but not well utilized, and programs that were under discussion at the time of the study analysis, but not yet established. These programs were included under Alternative 2 as a way to analyze their potential effectiveness if fully implemented.

The following is a list of the programs that comments suggested would be more correctly classified under Alternative 1. These programs are grouped by response into the following three subcategories and include further explanation under the response column:

Table 2: Public Concern: The NPS includes programs and policies in Alternative 2 that would be more correctly classified under Alternative 1.	
Group 1: Programs not yet implemented at the time the study was drafted.	<u>General Response to Group 1 Programs:</u> These programs are under discussion and have not yet been implemented; therefore, they are discussed in Alternative 2.
<p>Gaviota Rangeland Stewardship Alliance. Ranches have formed this watershed stewardship group, which they hope will expand to the entire Gaviota area. The Alliance is exploring a range of incentives for watershed protection.</p> <p>The Hollister Ranch Watershed Stewardship Program. Will develop off-creek watering systems for cattle and other protection measures that will protect all 14 watersheds on the Hollister Ranch. Exploratory meetings are underway for a Coordinated Resource Management Plan for the Gaviota area.</p> <p>Replenishing Fund. Santa Barbara Land Trust and California Rangeland Trust have recently formed a partnership to protect lands on the Gaviota Coast. They are exploring the concept of a revolving fund, calling it the replenishing fund.</p>	At the time the study was drafted, these partnership efforts were just forming, so were not included as existing programs in the study area.
<p>Williamson Act Amendments. A coalition of commodity groups is seeking amendments to the Uniform Rules to expand the open space provisions so that all rural, low density properties on the Gaviota Coast and elsewhere can participate in the Williamson Act program. The Act already provides State legislation to provide for 20-year "lease of development rights" should be introduced soon.</p>	Existing programs are discussed under Alternative 1. Amendments have not been implemented so they were discussed under Alternative 2.
<p>Transfer of Development Rights. The county has been working on the development of a Transfer of Development Rights Program for Santa Barbara County. Recent discussions indicate</p>	Program has not been implemented.

Table 2: Public Concern: The NPS includes programs and policies in Alternative 2 that would be more correctly classified under Alternative 1.

a test project may be offered soon.	
Local Coastal Plan Update. The process for the Local Coastal Plan and a Coastal Access Implementation Plan update has already begun. The Santa Barbara County Board of Supervisors has placed an update of the Local Coastal Plan update for Gaviota on its 5-year work plan. The county will hold community workshops and hearings as part of the planning process.	Program has not been implemented for the Gaviota Coast.
Jalama Beach County Park. Efforts are well underway to expand Jalama Park and Bixby Ranch Company has recently offered to donate 70 acres for park expansion.	Park expansion is under discussion, but numerous issues remain to be addressed before implementation.
Bixby Plan. The Bixby Plan proposes to increase private land stewardship and non-profit conservation activities, not just continue at current levels. The entire Cojo Ranch should be shown under Williamson Act as part of the Bixby Plan. These should be shown under Alternative 1, current programs and policies.	The components of the Bixby Plan have changed over the course of the study process, and have not yet been approved or implemented. Part, but not all, of Cojo Ranch is under Williamson Act contracts. The NPS did not consider proposals that were not approved or implemented to be part of the current conditions.
Public access on Vandenberg AFB. Vandenberg AFB officials have already expressed willingness to expand access opportunities to the extent that security requirements permit.	According to Vandenberg AFB, they do not currently have the staff resources to expand access opportunities.
Group 2: Existing efforts that are recommended for expansion under Alternative 2.	General Response to Group 2 Efforts: Existing programs. Alternative 2 suggests further expansion or enhancement of these existing programs to better protect the resources of the Gaviota Coast.
Riparian Protection. Vegetation and riparian buffers to protect resources are important components of conservation easements that have already been purchased or are under negotiation. Examples of properties where this has occurred include Freeman Ranch or La Paloma Ranch.	Most of the riparian areas throughout the study area are not protected through components of easements. Alternative 2 supports further local protection through expanded use of existing local, state and federal programs to encourage local protection of riparian areas.
Trail Development. Plans to expand trails are already underway in the study area. <ul style="list-style-type: none"> Landowners are already working with non-profits, or agencies, to develop non-intrusive trails (e.g. El Capitan Ranch and Rancho dos Vistas). The Coastal Commission already mandates completion of the California Coastal Trail. Both the Study Group and the Common Ground group have been advocating for more trail development in Los Padres National Forest. The NPS is already involved in the Juan Bautista de Anza Trail. The County Parks department is developing plans for more trails connecting public 	There are many proposed trails that have yet to be implemented. Implementation of trails requires significant funding. For example, the California Coastal Conservancy estimates that it would cost \$28 million to complete the California Coastal Trail along the Santa Barbara County coast. Alternative 2 supports further local protection through additional use of existing local, state and federal programs or establishment of a state land conservancy or open space district to expand the local trail system.

Table 2: Public Concern: The NPS includes programs and policies in Alternative 2 that would be more correctly classified under Alternative 1.

beaches with the Santa Ynez Ridge. Two of these already in advanced planning and development are the El Capitan trail and the Gaviota crest trail. Refugio Road is already being used as a trail.	
Conservation Funding. Funding sources do exist for conservation efforts. State bond monies that are exempt from California's annual budget crises, county funding from oil revenues, non-profit conservation organizations and private donations currently provide funding sources. The State Coastal Conservancy has always provided the Gaviota Coast conservation projects with priority status. New bond acts are introduced almost every year.	The draft study report recognizes these funding sources and their beneficial impacts (p. 87). However, these sources are limited, and land values in the area are very high. Bond acts have been the largest sources of acquisition funds. While not directly tied to annual budgets, passage of bond acts is sporadic and affected by the economy.
Marine Protection Areas. Protection areas were already established with the Channel Island Marine Sanctuary.	Marine protection areas have been established in limited areas within the Channel Islands National Marine Sanctuary. Additional marine protection area concepts along the study area coast were also developed by the California Department of Fish and Game in July 2001. These areas have not been established (p. 99).
NPS Rivers, Trails and Conservation Assistance Program. Technical and financial assistance has been available since 1994.	The Gaviota Coast Conservancy received varying but limited levels of assistance from this program from 1995 to early 2000. Local organizations could seek further assistance.
Group 3: Programs already included in Alternative 1.	General Response to Group 3 Programs: Existing Programs that were already included under Alternative 1 or analyzed as part of Alternative 1 in the Environmental Assessment.
Gaviota Creek watershed protection program sponsored by the Coastal Conservancy.	Described on page 89 of the draft study report under "Cachuma Resource Conservation District."
A number of landowners are already working with the Natural Resource Conservation Service and land trusts like Land Trust for Santa Barbara County, Trust for Public Land and the California Rangeland Trust.	Described in Alternative 1 on pages 86-89 of the draft study report.

ADEQUACY OF ENVIRONMENTAL ANALYSIS.

Public Concern: The environmental consequences of Alternative 2 have not been thoroughly evaluated. Additional programs may cause changes in management or physical changes to the landscape that could cause impacts. This Environmental Assessment does not provide adequate analysis to act as the environmental document for the actions proposed under Alternative 2, or to conclude that Alternative 2 is the environmentally-preferred alternative.

Comments included:

- The draft study report did not address the possible adverse consequences of future partnerships and land transfers. For example, El Capitan Ranch was bought by a land trust and transferred to the State; one year later the State no longer has funds to maintain the interest.
- Alternative 2 calls for funding for more easements. Granting an easement for conservation could have impacts on biology, air quality, property values, and landowners.
- The Land and Water Conservation Fund provide funding for projects that must be used for outdoor recreation. Outdoor recreation programs customarily involve increased human use and possibly introduced physical facilities in the natural landscape.
- Rivers, Trails, and Conservation Assistance involvement is not a project under CEQA or NEPA, however, the activity for which RTCA assistance is required would be considered a project and thus would be subject to environmental review.
- Enhancing state and county parks may translate into physical changes in the environment, including but not limited to additional roadways, parking areas, buildings, and supporting infrastructure. These changes would have impacts on traffic demand, cultural resources, drainage, air quality, biology, and visual values. Physical changes to State and county parks are subject to CEQA review depending on the degree of the level of change.

Response: Action items identified in the alternatives may require additional environmental analysis before they can be undertaken by the various implementing agencies and organizations. Because the alternatives in the Feasibility Study are conceptual in nature, the analysis of environmental consequences in this Environmental Assessment is necessarily quite general. The NPS is neither the decision-maker nor the implementing organization for the actions proposed. The study report can only include reasonable projections of potential impacts. Alternative 2 does not prescribe any particular action, but provides a menu of ideas that could be acted upon by local landowners, non-profit organizations, and government organizations, if they choose to do so. The decisions regarding which local initiatives to pursue are left to the local community, where conservation goals can be determined, priorities can be set and costs and benefits can be fully analyzed. The local community would be responsible for any necessary environmental analysis on specific projects.

RECREATION IMPACTS ON RESOURCES / TRAILS AND PUBLIC ACCESS.

Public Concern: Alternative 2 would focus on increasing public access, recreational use, and related facilities. Public access would compromise the efforts of farming and ranching operations and would lead to depletion and degradation of natural and cultural resources.

Comments included:

- There is no basis for the conclusion that increased recreational use would have no significant impacts.
- Access to scenic resources is more limited by conflicts with preservation of fragile coastal resources than lack of funding.

Response: Trails and recreational facilities can be established without significantly impacting natural resources and agricultural activities. "Use of siting, design, monitoring, and educational programs as well as adaptive management strategies could mitigate impacts from recreational activities (Environmental Assessment, p. 139)." The draft study report assumes that any additional recreational development would be sited in a way that would avoid impacts to resources. Any public access on private land would be at the discretion of the landowner. Because of the amount of concern on this issue included in the public comments, the study will be revised to include stronger language on the importance of providing public access only where it will not impair natural, cultural, or agricultural resources.

Since there are no specific projects described, the analysis is general. The draft study report acknowledges that action items identified in the alternatives may require additional environmental analysis before they can be undertaken by the various implementing agencies and organizations (Environmental Assessment, p. 110).

Public Concern: No change in policy regarding trails is necessary or justifiable. Santa Barbara County has a well-considered trail policy for agriculturally designated lands that arose out of collaborative efforts.

Response: Alternative 2 does not suggest new policies for trail development. Rather, the NPS suggests that through greater use of existing funding programs, and/or adoption of new programs by the local community, development of currently proposed trails could be accelerated.

Public Concern: Ferren Road is not a suitable recreational trail because it provides no link to other usable trails and would impair the viability of existing agricultural operations. Eagle Canyon owners strongly oppose any access for trails and Las Varas Ranch is cultivated with avocado.

Response: The Ferren Road trail has been proposed by the County of Santa Barbara. The proposed trail would link to a proposed extension of the West Camino Cielo Trail along the Santa Ynez Ridge. Alternative 2 suggests implementation of this trail where it can be negotiated with private landowners and through the use of existing local policies for trail development.

Public Concern: Adverse impacts from public access under Alternative 2 would be catastrophic to the resources and destroy many threatened and endangered species on Bixby Ranch. It would also be inconsistent with the clearly established priorities under the Coastal Act.

Response: Increased public access to Bixby Ranch would be at the discretion of Bixby Ranch landowners. Alternative 2 does not impose public access.

Trails and recreational facilities can be established in appropriate locations without significantly impacting natural resources and agricultural activities. Section 30210 of the Coastal Act states that "maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse."

Public Concern: There is no need for additional public access to Bixby Ranch for scenic resources since the public has full access already through the Union Pacific Railroad service that passes through the property along the entire coastline.

Response: The railroad lines are not publicly accessible; they only provide rail passengers with visual access to surrounding areas. Nevertheless, there are no proposals in Alternative 2 to increase public access to Bixby Ranch.

Public Concern: Pedestrian access as well as environmental habitat must be considered.

Response: Comment noted.

SOCIOECONOMICS.

Public Concern: Public access to coastal resources should be made available to persons of all races and incomes. Privatization of the coast perpetuates a history and pattern of discrimination denying people of color equal access to beaches, parks and recreation. Santa Barbara beachfront homeowners have recently sought to cut off public access to the beach. To address environmental justice concerns, include explicit language in Alternative 2 calling for the maximization of public access and recreational opportunities at the Gaviota Coast while ensuring the fair treatment of people of all races, cultures, and incomes.

Response: The draft study report acknowledges that under existing conditions, “A growing imbalance between recreation supply and demand would have some effect on the quality of experience.” Alternative 2 supports providing further recreational opportunities in the community through greater use of existing local, state and federal programs, as well as consideration of locally adopted programs for land conservation. NPS has revised Alternative 2 to include language stating the importance of providing recreational opportunities for people of all races, cultures and incomes.

Public Concern: The economic effect of removing large acreages from property tax rolls has not been disclosed or evaluated. Half the land in Santa Barbara County is under government control. More would dilute the tax base and create a burden on residents.

Comments included:

- How would private landowners be compensated for higher taxes as more land is removed from tax rolls?
- Vista del Mar Union School District and Vista de las Cruces School is the only school within the study area and has the majority of its budget (80—90%) dependent on property tax.

Response: The impacts of open space acquisition are discussed on p. 122 of the Environmental Assessment. Studies of the economic impacts of open space conservation show potential benefits from increased property values, job creation, business enhancement, and decreased local government expenditures, offsetting the potential decrease in property tax revenues from public acquisition of a specific property. Without a specific proposal for public land acquisition, a detailed analysis of impacts cannot be undertaken at this time. Additional analysis would need to be carried out by whatever agency proposes to acquire land.

Public Concern: Include explicit recommendations to ensure the provision of adequate low income housing.

Response: While it is beyond the scope of the study to make specific recommendations for affordable housing, the Environmental Assessment acknowledges that restrictions on development can impact the supply of affordable housing.

The NPS has revised the Environmental Assessment to state that “the county should take steps to minimize the indirect impacts on affordable housing. One option could be to explore pursuing higher density infill development in existing urban areas.”

Public Concern: Even with funds to support a state land conservancy or an open space district, property owners, farmers, minorities and low-income populations would suffer the consequences. As NPS points out, open space programs will harm low-income and minority population’s ability to find adequate housing. By limiting housing development, these recreation programs will make home ownership unobtainable for families in California.

Response: The shortage of affordable housing is an issue in Santa Barbara County under both Alternative 1 and Alternative 2. The effects of land conservation actions in Alternative 2 would be minor relative to the ongoing Alternative 1 effects of high land values, existing agricultural zoning, restrictions on development, and decisions made in nearby urban areas.

Public Concern: The analysis of Alternative 2 is flawed because it fails to acknowledge that the needs of the local economy and state require construction of new housing. Careful planning and sensitivity to the unique character of the study area will allow for slow growth and preservation of agriculture and natural resources. Tightening development restrictions is not an option for Santa Barbara County.

Response: The draft study report acknowledges the demand for housing and the shortfall relative to population projections (pages 115-123 of the Environmental Assessment), under both Alternative 1 and Alternative 2. The effects on the housing shortage of land conservation actions in Alternative 2 would be minor relative to effects of generally high land values, agricultural zoning, and impacts of decisions in urban areas.

Public Concern: The draft study report on page 123 states that the creation of new programs under Alternative 2 would attract new visitors, however the increases in traffic volume would be insignificant. How can this conclusion be valid?

Response: The Environmental Assessment states that traffic congestion from additional visitors would be minimal as compared to increases in traffic projected from the jobs / housing imbalance.

Public Concern: How would new visitors arrive to the area?

Response: The draft study report assumes that new visitors would arrive in the area in the same way that current visitors do – primarily by car, by Highways 101 and 1. Visitor traffic volumes would be minor relative to commute and other traffic.

Public Concern: The study fails to entirely address the adverse economic impact on businesses of the designation of an open space district. This could result in reducing or eliminating agriculture.

Response: An open space district's (OSD) emphasis depends on the desire and need of the local community. One example is the Sonoma Agricultural Preservation and OSD where 99% of the land protected remains in agriculture, in private ownership, with no public access. The Sonoma OSD was established in order to support agriculture. Impacts associated with establishment of an OSD would be based on the goals and priorities established for that OSD. Participation in an OSD or sale of land or easements would be entirely voluntary.

Public Concern: Increased tourism and recreation would have negative impacts on infrastructure and environment.

Comments included:

- Public recreation initiatives will create demands for infrastructure, services, low-income housing, and roads. The study does not address these impacts of "industrial tourism" from state and federal recreational initiatives.
- Tourism's impact on adjoining areas is excessive.
- Creation of a Gaviota Coast national park would increase tourism, degrade the environment, and increase development pressure.

- If anybody built a popular park here, there would be people coming onto the land, and that means congestion, litter and eventual destruction of the natural beauty that is here.
- Tourism and recreation would increase development such as hotels, gas stations.
- Concerned with property rights and effects of tourism. Increases in public access will be detrimental to the environment and to private property.

Response: The draft study report does not propose any activities that support “industrial tourism.” The decisions regarding which local initiatives to pursue under Alternative 2 are left to the local community, where conservation goals can be determined, priorities can be set and costs and benefits can be fully analyzed. The study report indicates that regional population growth will create a demand for additional recreational facilities. The tools suggested for use by the local community to conserve significant resources under Alternative 2 are flexible. In implementing any of the suggested programs the community would set its own specific goals as to the size and scope of any additional recreational facilities. As such, impacts associated with actions under Alternative 2 are conditional, based on the goals and priorities that would be established in the local community upon implementation of suggested actions.

Public Concern: What studies have been done to show the true economic impacts to an area whose access to resources have been removed?

Response: There are no proposals to remove access or use of resources under either alternative.

Public Concern: The summary chart comparing alternatives 1 and 2 is flawed. Some of the statements for Alternative 2 are inaccurate. For example, the increase of traffic volumes on the roadway through the Bixby Ranch would be far greater if public use expanded than any increase in housing on the Bixby Ranch itself under existing regulations.

Response: The study report acknowledges under Alternative 1 that “Specific recreation development could have localized adverse circulation impacts that could be mitigated through site design and access improvements” (Environmental Assessment, p. 121) and under Alternative 2 “An increase in the number of visitors could increase traffic congestion and noise along Highway 101 and local roadways. However, the increase in visitation under this alternative is expected to be minimal, relative to the commuter and other traffic from outside the study area” (Environmental Assessment, p. 123). The text under the topic “Socioeconomics” in Environmental Consequences section has been modified to include the same recreation impacts that would occur under both alternatives.

Other comments:

- The Environmental Assessment on pages 123 and 142 omits fact that population grows because of lack of enforcement of federal immigration laws.
- Decision not to bring Gaviota Coast under the NPS umbrella clearly opens the door to the sort of development that favors the rich and takes away from the heritage of coastal beauty that all Americans have inherited.
- Can't ignore environmental consequences of population growth. Where are they going to sleep?

Response: Comments noted.

INSUFFICIENT STATE AND LOCAL MONEY TO IMPLEMENT ALTERNATIVE 2.

Public Concern: Alternative 2 will neither meet the goals established for the study area, nor will it be fiscally feasible in California at this time.

Comments included:

- Despite financial and political obstacles, the environmentally preferred alternative in the draft study report relies on the ability of state, local, and private agencies to increase incentives, funding, and action in order to protect the resources of the Gaviota Coast. Resource constraints clarify the inability of the state, local, and private agencies to accomplish conservation and preservation in a timely manner.
- A State Land Conservancy requires funds from the state legislature and other public and private resources. With California suffering from a \$34.6 billion budget deficit, money to support these programs does not exist.

Response: The study report acknowledges that current economic conditions limit the potential in the near term for increased local, state and federal funding for conservation and recreation. Some initiatives may not be financially feasible in the near term, while others may require more creative approaches to funding. (Environmental Assessment, page 110).

PRIVATE LAND STEWARDSHIP

Public Concern: The landowners of the Gaviota Coast have been doing an excellent job of managing the Gaviota Coast resources. The most effective way of preserving land is through the connected stewardship that the people of this community know. The federal government/National Park Service cannot protect these resources as well as private owners.

Response: The draft study report acknowledges that “Ranchers, farmers, and other private landowners have played an important role in the protection of the Gaviota Coast’s significant resources.” See Alternative 1, p.85 of the draft study report. Neither of the alternatives proposes NPS or federal involvement. NPS involvement in the study area is the same under Alternative 2, as it is under Alternative 1, the “no action alternative.”

Public Concern: There are landowners that are currently willing to sell to a trust or others willing to donate or sell easements. Local people can protect the coast through a locally-based land trust.

Response: Comment noted.

Public Concern: Although public land trusts are an option to preserve the agricultural state of the Gaviota Coast, this option must be the voluntary choice of the landowner.

Response: The draft study report notes that the sale or donation of conservation or agricultural easements is entirely voluntary on the part of the landowner.

Public Concern: State should let private landowners keep control of our property (Hollister Ranch). State is doing a terrible job.

Response: No programs are suggested that would force the sale of private property.

Public Concern: Commenter questions the ability of landowners to preserve the land in its present condition into the future when developers offer huge sums of money.

Comments included:

- Landowner opposition and landowner control of local governments make the passage of more restrictive regulatory and planning measures unlikely.

Response: Comment noted.

AGRICULTURAL LAND CONSERVATION

Public Concern: Only local representatives working with farm and ranch families can reach consensus on how to best preserve agriculture. Commenter believes that United States Department of Agriculture (USDA) programs have the potential to address some of the same issues that led to the initiation of the feasibility study. These USDA programs have a better chance of success since they would be applied only to willing participations while maintaining land in private ownership.

Response: This comment is consistent with suggestions for agricultural land protection under Alternative 2. Alternative 2 supports further local protection through expanded use of existing local, state and federal programs.

Public Concern: The study needs to address permanence. The alternatives should address how to help the farmers stay on their land. More mechanisms are needed to address the financial stability of these landowners. Look at supporting and strengthening the Williamson Act and repealing the inheritance tax.

Response: The draft study supports strengthening the Williamson Act in Alternative 2 and acknowledges the importance of enhancing the viability of the area's agricultural operations through additional initiatives (draft study report, p.97).

Public Concern: The Williamson Act is better suited for protecting the Gaviota Coast than a "park."

Reasons cited include:

- The average size of each Williamson Act contract in the study area is approximately 400 acres.
- Roughly 80% of the private land in the study area is under Agricultural Preserve status.
- The program is actively preserving 63,000 acres within the study area, it does not displace farmers or ranchers, and "parks" draw millions of people to trample land.

Response: The study report acknowledges that the Williamson Act has been an effective tool to protect agricultural land in the study area. The Williamson Act is most effective in preventing farmland conversion when combined with zoning constraints and other agricultural land preservation tools. However, the Williamson Act does not offer permanent protection. Research on the Williamson Act's effectiveness throughout California has found it to be less successful in areas where growth pressures have caused rapid urban development. The draft study report states that under Alternative 1, growth pressures and high land values could cause additional land to be removed from active Williamson Act contracts in the long-term. (See page 126).

According to Santa Barbara County data, 72% is the more accurate number for the amount of acres of private land with Williamson Act contracts (as opposed to 80% suggested by commenter) and the average size of parcels with Williamson Act contracts in the study area is approximately 200 acres.

Public Concern: Agricultural land contributes substantially to the state, national and world food supply and is a vital part of the state's economy. These lands contribute to the economic betterment of local areas as well as the entire state and are an important source of food, fiber, and other agricultural products. None of these are being recognized as the NPS choice of enhanced federal assistance.

Response: The NPS recognizes the importance of agricultural land protection on the Gaviota Coast. NPS discusses federally-funded agricultural assistance programs under both Alternatives 1 and 2 (See pages 88 and 95 in the draft study report). No programs suggested in Alternative 2 advocate removing land from agricultural production; rather they acknowledge the regional, national and global economic factors that are likely to reduce agricultural viability. Language has been added to the study report to emphasize this.

COMMENTS RELATED TO ADDITIONAL ALTERNATIVES OR PROTECTION MEASURES

Public Concern: A local plan, absent of additional federal involvement, would better protect the unique resources of the Gaviota Coast while also acknowledging the environmental stewardship of the local community and Vandenberg AFB.

Response: Alternative 2 provides options for a locally-based plan to protect the Gaviota Coast. Alternative 2 does not prescribe any particular action, but provides a menu of ideas that could be acted upon by local landowners, non-profit organizations, and government organizations, if they choose to do so. The decisions regarding which local initiatives to pursue are left to the local community, where conservation goals can be determined, priorities can be set and costs and benefits can be fully analyzed.

Public Concern: The Barbareno Chumash Council has asserted the need for a "homeland" base to create a proper relationship with the two respective peoples.

Response: Opportunities for a Chumash "homeland" were considered in the National Seashore management option described in the draft study report. Page 79 of the draft study report states that "Congress would have authorized the Secretary of Interior, in consultation with the Santa Ynez Band of Chumash and other Chumash organizations, to study the potential for establishing a reservation or other lands set aside for Chumash people within the National Seashore." The National Seashore management option was determined to be infeasible by the NPS, and further consideration of a Chumash homeland was considered to be beyond the scope of this study.

Public Concern: Exclusion of NPS management alternatives is arbitrary and capricious. NPS has not made a compelling case as to why the other management options should not be seriously considered. The NPS should expand the current range of alternatives to reflect the original scope of the study, as described in the "Management Options" section. The NPS should prepare an environmental impact statement (EIS) because: (1) the remaining two alternatives are inadequate for ensuring any level of future protection for the Gaviota Coast; and, (2) the Gaviota Coast contains nationally significant treasures and resources that are gravely threatened. An EIS provides the only mechanism to provide "a clear basis for choice among options by the decision-maker and the public and to explore and objectively evaluate all reasonable alternatives." (40 CFR 1502.14, NEPA, 42 USC section 4321, 42 USC section 4331(a), 42 USC 4331).

Response: The study report did not include alternatives with NPS management because they were determined not to be feasible. NPS management was determined to be infeasible because sufficient land is not currently available to the NPS; strong opposition from study area landowners makes it unlikely that effective NPS management could occur; and the NPS is not able to undertake new management responsibilities of this cost and magnitude, given current national financial priorities. NPS management

policies direct staff not to develop alternatives for NPS management for areas that don't meet the criteria for inclusion in the national park system (section 1.3.4).

Public Concern: The study is flawed because it does not recommend an alternative that protects agricultural land and limited recreation and access consistent with natural resource constraints and private property rights.

Response: The study followed the special resource study process as mandated by legislation and NPS policies. Alternative 2 suggests options for keeping agricultural land in production. The draft study report also finds that conflicts between public access and private lands can be reduced through education and by providing increased recreational opportunities for the public that are sensitively sited and designed.

Alternative 2 could provide more resources towards increasing recreational opportunities when land becomes available, as well as monitoring access near private lands and educating trail users in an effort to reduce conflicts.

Public Concern: Suggest that the NPS explore alternatives at a lesser scale than the full study area.

Response: Most of the National Park Service management options explored by NPS included options for protecting only portions of the study area. NPS determined these options to be infeasible additions to the National Park System.

Public Concern: Why not buy land in the inner cities and create parks, farms, camping places for people to use more often. People need National Parks partnerships where they live. Then they will like to live in the inner cities, and businesses will want to be located nearby.

Response: Comment noted.

FEDERAL OR NPS INVOLVEMENT.

Public Concern: There is no need for federal or National Park Service involvement on the Gaviota Coast. Consensus groups are educating the community and cooperating to advise our elected officials on how they can better achieve locally based solutions.

Comments included:

- Support local control using a regional park system along the coast, easements, downzoning and protection through the Williamson Act.
- Local government agencies have done a great job in protecting the environment.
- Development is a local land use issue.
- Recognize that a local protection plan is the best option for the protection of the Gaviota Coast based on the local community's strong record of environmental achievement.

Response: The study does not propose NPS involvement in either of the two alternatives. NPS involvement in the study area is the same under Alternative 2, as it is under Alternative 1, the "no action alternative." Alternative 2 provides a menu of ideas that could be acted upon by local landowners, non-profit organizations, and government organizations, if they choose to do so. Local consensus groups provide a forum to discuss options identified under Alternative 2 as well as other conservation options.

Public Concern: Can the community get NPS help in coordinating local strategies?

Response: The local community could request technical assistance from the National Park Service's Rivers, Trails and Conservation Assistance Program (RTCA). Technical assistance is awarded on a competitive basis. The RTCA program works with community groups and local and state governments to conserve rivers, preserve open space, and develop trails and greenways. RTCA staff can contribute expertise in facilitation, public outreach, resource assessment, and coordination to local resource planning efforts. Applications are due July 1 of each year.

Public Concern: While strategies outlined in Alternative 2 are appropriate and should be pursued, these strategies will not adequately protect the Gaviota Coast considering its national significance. Federal assistance or NPS designation is needed to adequately protect the nationally significant resources of the Gaviota Coast in the long-term.

Comments included:

- Many comments supporting this public concern included statements described in previous public concerns such as development threats, rising land values, and the inability of local programs to curb development in the face of population pressures.
- Expected population growth will adversely affect recreational quality and further limit access to the area's already scarce public beaches, several of which are over capacity. NPS can help fulfill the responsibility of providing equal access by everyone to the coast. Particularly if efforts to do away with the Coastal Commission succeed.
- Local politicians show little interest in more protective measures; County Board of Supervisors is fickle.
- Local control will only allow local interests to push for development.
- Land trusts cannot keep pace with land offered for sale of development.
- No single entity can coordinate protection efforts in the study area; collaboration is necessary.
- The public cannot afford to purchase the land for sale without NPS help. Local and state programs cited in Alternative 2 are not strong enough or funded adequately to provide long-term protection for the Gaviota Coast and its resources. State and county studies underscore this issue.
- Current budget crisis in California and highly competitive, limited national funding programs make the possibility of achieving greater funding for easements, grants and purchases unlikely.

Response: NPS management on the Gaviota Coast has been determined infeasible by the NPS. The NPS has suggested options for the local community to protect resources, conserve land, and provide opportunities for public enjoyment in Alternative 2. The draft study report acknowledges that current economic conditions limit the near-term potential for increased local, state and federal funding for conservation and recreation. Some initiatives may not be financially feasible in the near term, while others may require more creative approaches to funding.

Public Concern: Portions of the study area should be added to a National Park or included in the National Park System.

Comments included:

- The land known as the "Ranch."
- All of the coastal watersheds from Pt. Sal to Vandenberg Air Force Base.
- The coastal land from El Capitan State Park to Ellwood.
- Portions of the Gaviota Coast should be a National Seashore similar to Cape Cod or Point Reyes National Seashores.
- Areas near the National Forest or that provide key linkages from the mountains to the ocean.

Response: NPS management on the Gaviota Coast has been determined infeasible by the NPS, therefore no land is recommended for addition to the National Park System. The NPS has suggested options for the local

community to protect resources, conserve land, and provide opportunities for public enjoyment. Key areas could be acquisition priorities for local organizations using existing or newly developed funding sources.

Public Concern: Inclusion of the study area in the National Park System would cause impacts.

Comments included impacts such as:

- More overhead and management costs
- Impacts on landowners due to excessive regulations
- A National Seashore, or any other type of federal control of the Gaviota Coast, would put existing property tax revenue sources in jeopardy.
- Opening the area to tourism by NPS is not in the best interest of wildlife protection.
- As the NPS struggles with traffic and congestion from visitors in the parks, the Gaviota Coast will likely face an infiltration of visitors pursuing recreational activities.

Response: Impacts of inclusion in the national park system were not assessed because the NPS determined NPS management to be infeasible. The study does not propose NPS involvement in either of the two alternatives. NPS involvement in the study area is the same under Alternative 2, as it is under Alternative 1, the “no action alternative.”

Public Concern: NPS failed to analyze the cumulative social, cultural, and economic effects of NPS management.

Comments included:

- The NPS did not consider or fully disclose related actions, or, past, present and future effects, especially potential distributional effects on potentially affected property owners and rights. There is no evidence in the current Environmental Assessment of full disclosure. In light of the NPS past, present and future actions, alone, there exist significant cumulative effects.
- The document is lacking any discussion of the reasonably foreseeable or cumulative effects from other federal actions. (*Fritiofson v. Alexander*; *NWF v. Federal Energy Reg Commission*; *City of Davis v. Coleman*.) Cumulative adverse effects on the human environment are significant, in context and intensity, potentially exposing the locally affected communities and individuals to economic, social, and cultural significant adverse impacts on the people, government, and schools.
- Page 114 doesn't include the impacts of federalizing private property, which is false and misleading because federalizing private property causes human displacement.
- No discussion of undermining existing conservation programs.

Response: Impacts of NPS involvement in the area were not analyzed because there is no new NPS involvement proposed in either alternative. NPS involvement in the study area is the same under Alternative 2, as it is under Alternative 1, the “no action alternative.” Cumulative impacts are included on page 164 of the draft study report. Action items identified in the alternatives may require additional environmental analysis before they can be undertaken by the various implementing agencies and organizations.

Public Concern: National Park Service policies are not conducive to agricultural production and continued agricultural viability.

Comments included:

- NPS lacks credibility in dealing with property owners.
- Declining farms and ranches at Point Reyes National Seashore. Leases with farmers and ranchers were not renewed by the Park.
- Landowner conflicts at Channel Islands National Park that resulted in the landowner being removed from Santa Rosa Island.

- Farming requires flexible decision-making.
- The report fails to acknowledge that including productive agricultural land in the NPS inevitably compromises the long-term viability of agriculture.
- A park is an unsuitable overlay on agricultural lands.

Response: There is no new NPS involvement proposed in either alternative. Both alternatives encourage local efforts to maintain agricultural viability.

Public Concern: The Gaviota Coast is not suitable for protection by the NPS because the NPS has no tools for preservation that do not include rendering the land public. NPS always protects lands by increasing public access, a strategy that is inappropriate for the Gaviota Coast.

Response: NPS works cooperatively with private and public landowners in many National Parks through easements, land trusts, cooperative management arrangements, educational and interpretive opportunities, etc.

NPS manages areas with a wide range of public access opportunities, from high intensity visitor use to wilderness areas where emphasis is on opportunities for solitude. For example, at Yosemite National Park 94% of its 760,000 acres is a designated wilderness area. The NPS establishes local carrying capacities at levels that will not impair resources. In addition, national parks control access through techniques such as careful placement of facilities, alternative transportation systems, and permit systems.

Public Concern: Commenters would like to see federal designation or NPS involvement on the Gaviota Coast. A National Park would be more compatible with agricultural operations than luxury mansions, golf courses, resorts and suburban developments on the Gaviota Coast.

Comments included:

- Disappointed that the Gaviota Coast was not recommended for inclusion in the National Park System, the NPS could have been helpful in protecting the area.
- Landowner opposition has sacrificed the public interest.
- Landowners and the public agree that the Gaviota Coast should remain as it is. Recommend a designation to Congress.
- NPS management would fulfill the goals of NEPA, section 101 (b).
- Hope that NPS could reconsider designation in the future.
- Please help us protect the Gaviota Coast.

Response: Comments noted.

Public Concern: NPS states that 2.5 million people could be expected to visit a Gaviota National Park annually.

Comments included:

- Visitors would destroy the very environment NPS intends to protect and cause traffic demand problems.
- It has been suggested that Highway 101 might need to be expanded to six lanes to accommodate increase visitors for a National Park.

Response: Commenter erroneously attributes this visitation estimate to the NPS. The NPS has not made any such estimates of visitation numbers, visitor services, traffic, or highway construction. The estimates referred to in the comment have been used by the Coastal Stewardship Council, but have no relationship to NPS research.

Public Concern: According to NPS, many federally-owned lands established for tourism and recreation are no longer able to meet the transportation demands placed upon them by the public.

Response: While this statement is accurate, the NPS is working to address transportation demands across the National Park System.

Public Concern: National Park Service has made poor management decisions at existing National Parks such as Yellowstone and Channel Islands.

Comments included:

- NPS employees have ignored guidelines on protecting architecture resources at Channel Islands National Park.
- NPS handled the poisoning of the rat population at Anacapa Island (Channel Islands) poorly causing impacts to other species including birds and mammals.
- The recreational industry has a chokehold on Yellowstone National Park. NPS allowed use of snowmobiles that have proven environmental impacts.

Response: Comments are outside the scope of this study.

Public Concern: Management of the Channel Islands National Park should have been included in the study report as a basis for comparing alternatives.

Response: This analysis is unnecessary since there is no new NPS involvement proposed in either alternative.

Public Concern: Additional federal influence on Vandenberg AFB will result in commercial launches moving overseas to the detriment of our economy.

Response: The study report does not propose NPS involvement with Vandenberg AFB in either of the two alternatives. NPS involvement is the same under Alternative 2, as it is under Alternative 1, the “no action alternative.”

Public Concern: Commenter is opposed to any National Park designation on the Gaviota Coast.

Comments included:

- Oppose National Heritage Area designation.

Response: There is no new NPS involvement proposed in either alternative. There is no National Park or Heritage Area designation proposed.

Public Concern: NPS is subject to political pressures and changes to NPS policies.

Response: Comment noted.

GENERAL COMMENTS RELATED TO THE ALTERNATIVES OR PROTECTION OF THE GAVIOTA COAST

Public Concern: Conservation non-profits re-sell the land and are not automatically superior stewards of the environment.

Response: Conservation non-profits that re-sell typically transfer such lands to another land management or conservation agency or organization.

Public Concern: How would areas of historical value be protected?

Response: Under both alternatives, areas of historical value would be protected under existing programs and policies. Under Alternative 2 it is suggested that further analysis and study could identify threatened resources and use of existing or new grant programs could help to protect such resources.

Other comments:

- The draft Gaviota Coast Feasibility Study supports the current focus by the county on conservation at the local level.
- The proposed alternatives offer no creative solution and fail to realize the hopes that had been held out at the beginning of the study — non-standard, non-traditional options.
- The Gaviota Coast should be managed so that all of the rare plants and animals can roam free without industry and development.
- If NPS backs Alternative 2 there will be costly litigation.
- NPS support for Alternative 1 will undermine all the good initiatives underway.
- Economies change; protecting our coast may be a higher national priority at some point. Give local and statewide conservation measures a chance, but if they fail, return to the national seashore concept.
- Gaviota Coast needs the continued support of local law enforcement agencies and California Department of Fish and Game to protect the land from trespassers abusing private property rights.
- The Gaviota Coast needs more protection and conservation tools.
- The study highlights the critical need for more protection.
- Further protection is needed so that agriculture stays viable. This is key to ensuring the protection of the open space.
- This area is a national treasure that must be preserved for current and future generations.
- With money in short supply and other pressing issues on the burner, need a plan which can generate larger community involvement, and focus efforts toward the far future when the area is protected forever and for our nation.

Response: Comments noted.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

Public Concern: Alternative 1 should be considered the environmentally preferred alternative; Alternative 2 has been incorrectly identified as the environmentally preferred alternative.

Comments included:

- Additional programs and policies should be added to Alternative 1 so that an accurate evaluation and conclusion of the consequences can be drawn.
- When the descriptions of alternatives 1 and 2 are corrected, many of the environmental and socioeconomic advantages shown for Alternative 2 will be advantages under Alternative 1.
- There are numerous omissions that have not been adequately addressed, listed, discussed, or subjected to environmental evaluation for Alternative 2 and there is no scientific basis for recommending Alternative 2.

Response: Alternative 1 is the “no action” alternative, as required by NEPA [40CFR §1502.14(d)]. Additional guidance from the Council on Environmental Quality states that “‘no action’ is ‘no change’ from current management direction of level of management intensity,” and “the ‘no action’ alternative may be thought of in terms of continuing with the present course of action until that action is changed.” (Federal Register, v. 46, no. 55, p. 18027, 3/23/1981). Programs and policies suggested as additions to Alternative 1 have been analyzed, and several have been added to Alternative 1 (refer to the tables under Alternative 1 earlier in this document for a full discussion of this issue).

Alternative 2 provides a menu of ideas that could be acted upon by local landowners, non-profit organizations, and government organizations, if they choose to do so. Alternative 2 is identified as the “environmentally preferred” alternative because it increases the local capacity for permanent land conservation, the potential for effective sustainable management of significant natural and cultural resources in the long term, and public appreciation of the study area.

Public Concern: Current programs and policies are environmentally preferred because they provide for permanent land conservation, effective management of resources and public understanding of the area's significance.

Response: NPS believes that Alternative 2 better meets the criteria for the “environmentally preferred” alternative. The study report states that under Alternative 1, with limited funding available for conservation, population and growth pressures may result in long-term impacts to resources that represent important historic, cultural and natural aspects of our national heritage. The eastern portion of the study area would be the most affected. Further, without an ecosystem approach, development in the long term could result in habitat fragmentation and an eventual degradation of the study area’s species diversity (Environmental Assessment, p. 165).

Public Concern: Alternative 1 is the environmentally preferred alternative because federal government association would do more harm than good.

Response: The study does not propose any increased federal authority or new NPS involvement in either of the two alternatives. NPS involvement in the study area is the same under Alternative 2, as it is under Alternative 1, the “no action alternative.”

Public Concern: Several programs and policies in Alternative 2 have the potential to cause significant environmental impacts that have not been considered or evaluated.

Response: While Alternative 2 would be implemented through state and local decisions, NPS believes that Alternative 2 could be implemented without any significant adverse impacts. Because the alternatives and analysis of environmental consequences in this report are general, there is considerable flexibility to plan for specific projects that mitigate, reduce or eliminate adverse impacts. The local community would be responsible for any necessary environmental analysis on specific projects.

Public Concern: There is no cumulative advantage under Alternative 2 because the development threat contemplated will never occur due to existing regulations in the coastal zone.

Response: The Coastal Plan is subject to future changes and interpretation through public planning processes. Although it is difficult to anticipate with any certainty, with future development pressure and rising land prices for ranch lands, the coastal plan may not be effective in the long term.

Public Concern: Alternative 1 would have adverse environmental impacts on the study area.

Comments included:

- It would be inadequate to address existing and growing threats to the Gaviota Coast such as residential build-out on the South Coast. It would be contrary to its mission of protecting nationally significant resources for the NPS to recommend Alternative 1 as the preferred alternative.
- Selecting Alternative 1 would leave NPS in the very inappropriate position of recommending an alternative with known adverse impacts to nationally significant resources. NPS support for Alternative 1 would hurt local efforts to protect this nationally significant coastline.
- Recommending Alternative 1 would be inconsistent with the findings of the study and the Environmental Assessment that, under Alternative 1, with limited funding available for conservation, population and growth pressures may result in long-term impacts to resources that represent important historic, cultural, and natural aspects of our national heritage.
- Alternative 1 offers no additional tools to address these issues.

Response: Comments noted.

Public Concern: Make Alternative 2 the preferred alternative when submitting the report to Congress.

Comments included:

- May help prompt state and local government to take action. Alternative 2 is the environmentally preferred management option.
- After enumerating the natural and cultural resources that exist in the study area and identifying Gaviota Coast as suitable for inclusion in the National Park System, it makes no sense for NPS to recommend Alternative 1 to Congress as the preferred management option.

Response: Comment noted.

Public Concern: Why is Alternative 2 "environmentally preferred" given that NPS will not get involved? Why is NPS in charge of identifying the preferred alternative since they've given up on a possible national park?

Response: NPS policies require NPS to identify an "environmentally preferred" alternative in a draft Environmental Impact Statement or Environmental Assessment so that the public can have the opportunity to comment on it.

ENVIRONMENTAL IMPACT STATEMENT

Public Concern: The National Park Service (NPS) should prepare an environmental impact statement (EIS) because the current Environmental Assessment does not address federal action impacts:

Comments included:

- It does not address the potential consistencies or inconsistencies with state or local laws, policies, plans, and budgets, nor did it consider effects on statutory protection of property rights, or, citizen preferences. (40 CFR 1508.27(b)). Where is the NPS authority to change land use and regulate these uses in these targeted protection corridors?
- It could have significant adverse effects on the human environment.
- It has been particularly controversial since the NPS has not fully disclosed proper effects analysis.
- It has national implications, as well as local and regional. (40 CFR §1509.27)
- It has no mitigation plans for the impacts on affected parties - to show ways to reduce or eliminate harm to the human environment.

Response: NPS policy does not require an EIS for a special resource study unless the resource being studied meets the criteria for inclusion in the national park system (nationally significant, suitable, feasible, and requiring NPS management), one or more of the alternatives being considered is designation as a national park system unit, or the proposal has the potential for significant impacts to the human environment. An Environmental Assessment is a means of determining whether or not there are potential significant impacts. If so, an EIS may be required. (NPS Director's Order #12, Handbook, Sections 4.4 and 2.10)

The study finds that NPS management is not feasible, does not propose NPS involvement in either of the two alternatives, and therefore does not require preparation of an EIS.

Public Concern: An Environmental Impact Statement (EIS) should be prepared to substantiate the environmentally preferred alternative.

Response: See response above. An EIS is not required for identification of the environmentally preferred alternative; in fact NPS policies require that an Environmental Assessment identify the environmentally preferred alternative so that the public can have the opportunity to comment on it (NPS Director's Order #12, Handbook, Section 4.5, E.9).

BIOLOGICAL RESOURCES

Public Concern: Cattle grazing in the study area supports at least 5,900 head of cattle on 39,000 acres of grazing land. No irreversible impacts are associated with existing conditions. Associated plants and fauna appear to coexist with present grazing activities and there are 1,400 plants and species found to exist within the study area.

Habitat areas on Hollister Ranch are fully discussed in the Santa Barbara County Coastal Plan and the Pacific Research Station General Technical Report, 12/1999 showing that no adverse influence to existing ecosystem integrity is observable. (Cites Stephenson and Calcarone, General Technical Report, USA Pacific SW Research Station, Dec. 1999, p. 72.)

Response: The Stephenson and Calcarone report applies only to the Los Padres National Forest, which is approximately 10% of the study area, and does not include Hollister Ranch.

WATER RESOURCES

Public Concerns regarding water resources include:

- What impacts would the programs and policies have on water consumption? What burden will programs set forth in Alternative 2 place on existing water supplies?
- Will proposed programs impact existing domestic and agricultural water distribution systems? Will they impact existing water rights?
- Will expansion of water distribution systems require federal permits? There is no discussion, listing, or evaluation of this.

Response: Long-term beneficial impacts on water consumption are expected through protection of open space and restricting development. No impacts to water distribution systems are expected. The study does not propose any new federal authorities or NPS involvement so there would be no change to permit requirements. The alternatives in the *Feasibility Study* are conceptual in nature, therefore the analysis of environmental consequences general. The draft study report can only include reasonable projections of likely impacts.

Public Concern: Definition of riparian includes rights to water. Lack of discussion of this implies there will be no impact on residents.

Response: As defined in the report's glossary (p. 233) "riparian" refers to "the land and vegetation bordering a natural watercourse such as a river or stream. Riparian habitat provides food, nesting habitat, cover, migration corridors, riverbank protection, erosion control and improved water quality, and numerous recreational and esthetic values."

Public Concern: Available ground and surface water supplies exceed projected demands to authorized buildouts within Hollister Ranch. No irreversible impacts or observable habitat degradation are associated with the present levels of water consumption. No key ecological issues are influenced by water storage, control, or withdrawal within the Gaviota Coast study area.

Response: Comment noted.

Public Concern: The county provided false data for Arroyo Quemado on page 153. Data on page 154 is false and misleading, with artificially elevated counts. County could have required access for unprejudiced sampling, but did not, in violation of the Endangered Species Act and the Clean Water Act.

Response: NPS believes the data sources cited in the draft study report are reliable. Nevertheless, if this portion of the data were found to be inaccurate, it would not change the conclusions of the study.

Public Concern: Present ground water pumping is well below the projected safe yield of 2000 acre feet for existing ground water basins.

Response: Comment noted.

SCENIC RESOURCES

Public Concern: The study suggests that overgrazing is aesthetically displeasing but does not give any examples. The scenic resources are high and will remain so because of current policies. The study does not give one example of how overgrazing can be aesthetically displeasing.

Response: Overgrazing can cause negative impacts on scenic resources through soil erosion, dust, and removal of vegetation.

PRIVATE PROPERTY RIGHTS

Public Concern: The Environmental Assessment is lacking in analyses and documentation of the potential adverse effects on property owners' civil rights. Federal regulations require:

- Civil Rights Protection (18 USC 241 and 245) require analysis of the potential burden of one group at the disadvantage of other groups rights and protectable interests.
- Takings Implication Assessment. Private property owners requested NPS to conduct this type of assessment.
- Regulatory Enforcement Act of 2002 – prevents the promulgation of rules to prevent perceived unfair or excessive enforcement. Property owners, small businesses and the agricultural community have had concerns regarding regulatory enforcement actions; there for NPS has a responsibility to disclose how the alternatives will impact the Regulatory Enforcement Act.
- Regulatory Impact Analysis (Presidential Order 12291) - NPS must display how the alternatives will impact local businesses and investments.
- Environmental Justice (Executive Order 12898) - The NPS must discuss the potential for environmental justice effects. NPS is required to present demographics and discuss its requirements with minority and low-income communities and assess impacts under the National Environmental Policy Act.

Response: There is no new NPS involvement or federal regulatory action proposed under either of the alternatives analyzed in the Environmental Assessment; therefore NPS is not required to assess Regulatory Enforcement or Regulatory Impact Analysis.

- There is no federal action proposed that would impact a particular group's civil rights.
 - A Takings Impact Assessment is not required for a NPS feasibility study.
 - Environmental Justice has been addressed in the Environmental Assessment in compliance with NEPA regulations. Some additional language has been added to the report.
-

Other comments:

- Private property rights are being destroyed by misguided environmental extremists.
- Private property rights are important and should be protected.
- Taking [land] without paying is stealing.
- Concerned about people illegally cutting trails causing impacts to private property.
- This isn't about protection of the coastline. It's about special interest groups who want to get their hands on someone else's land because they can't afford to buy their own.

Response: Some additional language has been added to the report to clarify our intent that all aspects of Alternative 2 respect private property rights.

COMMENTS RELATED TO SPECIFIC AREAS OR LOCATIONS

Specific concerns were received regarding several large land areas within the study area. These areas include Vandenberg Air Force Base, Hollister Ranch, and Bixby Ranch. Comments range from concerns regarding environmental impacts to additional background information provided by landowners.

VANDENBERG AIR FORCE BASE

Public Concern: Vandenberg Air Force Base (Vandenberg AFB) is already government property. Suggest making some Vandenberg Air Force Base beaches or existing developed areas, such as the lighthouse, available for public viewing or access.

Response: Under Alternative 2, the NPS suggests that Vandenberg AFB could work through partnerships with neighboring jurisdictions and non-profits to expand and enhance their public access and education programs. Taking such action would be at the discretion of Vandenberg AFB.

Public Concern: Increased visitor facilities on Vandenberg AFB would impact launch sites and defense programs and threaten security.

Response: The NPS is not proposing any new visitor facilities at Vandenberg AFB. However, the draft study report suggests, "Vandenberg Air Force Base could seek opportunities to increase public access to specific areas of the base in ways that don't threaten natural and cultural resources or the safety and security of the base." Taking such action would be at the discretion of Vandenberg AFB.

Public Concern: Representative Gallegly is sponsoring legislation that would exempt the Department of Defense from most environmental controls. Should legislation pass, the environment at Vandenberg AFB could be significantly degraded.

Response: Comment noted.

Public Concern: Comments with concerns regarding National Park Service involvement at Vandenberg AFB.

Comments included:

- I enjoyed hunting on Vandenberg AFB in the past; I do not want to see that restricted any more than it already has been.
- Do not want to see motor homes or overcrowded campgrounds at Vandenberg AFB.
- Vandenberg AFB must be protected from public access due to military operations.
- If a national seashore is created, the NPS will dictate who and how Vandenberg AFB conducts business. Vandenberg AFB must remain a military operation and not a park.
- Vandenberg AFB has ticks and pigs which would present management problems for the NPS.
- What impact will a National Park have on operations Vandenberg AFB?

Response: There is no new NPS involvement or designation proposed in either alternative, therefore there will be no associated impacts to Vandenberg Air Force Base.

Public Concern: The NPS and the U.S. Air Force recently announced a new tool to improve their cooperation in the Western Pacific Regional Sourcebook. This tool will be very useful in coordinating with Vandenberg AFB.

Response: Comment noted.

HOLLISTER RANCH

Public Concern: Please revise page 85; Hollister Ranch has 136 parcels (3 of which are held in common). Actual acreage is closer to 14,500. Change the word "much" to "most."

Response: Comment noted. NPS revised draft study text.

Public Concern: Please revise page 9, paragraph 1 and page 127, paragraph 3: reference to Hollister Ranch as a "subdivision" gives the impression of 136 individually fenced off parcels, each with its own operation. It is also stated that it functions as a cattle ranching cooperative where many of the landowners participate by allowing use of their parcels for seasonal grazing. Ninety-five percent of landowners participate in the cattle operation via grazing leases or Hollister Ranch Coop Membership. It would be more accurate to say "most" landowners.

Response: Hollister Ranch is subdivided into lots with separate ownership, therefore it can be considered to be a subdivision. NPS revised draft study text to state that most (95%) of the Hollister Ranch landowners participate in the cattle operation.

Public Concern: Hollister Ranch is not mentioned as a large private landholding in "Resource Description," it is specifically mentioned as such in "Feasibility" on page 69, under the section "Access and Public Enjoyment Potential." This appears when it is useful to NPS purpose that Hollister Ranch is a large private landholding and when it is not Hollister Ranch is not mentioned.

Response: The table in the Resource Description refers to large contiguous landownership. Hollister Ranch was not included because it includes many parcels owned by different individuals. The reference in the section on feasibility refers to large blocks of land in private ownership as it relates to public opportunities to access the coast.

Public Concern: On page 38, under existing coastal access for recreation, Hollister Ranch is used as an example of "strictly private beaches" but Bixby and Western Gate Ranches are not used as similar examples. Why is Hollister Ranch singled out? Public can access beaches if they access laterally via Gaviota State Park or Jalama Beach County Park. There is no vertical access. Public access allowed for selected educational and scientific purposes and those who enter are provided hosts as guides and professional docents when appropriate.

Response: Hollister Ranch is briefly mentioned as an example of private beaches. This reference is made in an introductory paragraph describing public access in the study area. A complete description of all areas both accessible and inaccessible to the public follows this paragraph. Hollister Ranch was mentioned as an example because it represents the longest stretch of publicly inaccessible, privately-owned coastal land in the study area.

Public Concern: Commenters support the way Hollister Ranch manages its land.

Comments included:

- There are extensive rules and covenants to protect land.
- There are educational programs for the public to come and see, study, and visit the area.
- Hollister Ranch protects the land and beach areas through a conservancy.
- Hollister Ranch protects coastal resources through a conservancy, at no cost to the public.

Response: Comments noted.

Public Concern: The Hollister Ranch Owner's Association provided additional background information on Hollister Ranch including location, history, parcel information, organizations, and programs.

Response: Comment noted.

BIXBY RANCH

Public concern: While Alternative 2 might be a valid recommendation for some of the study area, it is clearly a "no" for the Bixby Ranch. The study should have concluded for the Bixby Ranch that Alternative 1 was the environmentally preferred alternative.

Comments included:

- The Bixby Plan already includes easements on land that are extremely valuable so additional funding sources will not help.
- The Bixby Plan also addresses the preservation of resources in a responsible manner with very limited access to protect the natural and cultural resources that are there.

Response: The NPS is aware of the current easements and agricultural protections on the Bixby Ranch. The study area is large and diverse, and no one set of actions would be appropriate throughout the entire area. Alternative 2 does not establish any additional regulatory action on the Bixby Ranch. Alternative 2 presents options that the NPS found could assist in conserving the Gaviota Coast. Options listed under Alternative 2 would be implemented solely at the discretion of the local community.

Public Concern: More public access and preservation in a semi-wilderness state are inconsistent goals. Bixby Ranch favors the preservation goal, which can best be achieved through private ownership with appropriate incentives.

Response: Trails and recreational facilities can be established without significantly impacting natural resources and agricultural activities. The draft study report states that, "Use of siting, design, monitoring, and educational programs as well as adaptive management strategies could mitigate impacts from recreational activities."

The draft study report assumes that any additional recreational development would be sited in a way that would avoid impacts to resources. Because of the amount of concern on this issue included in the public comments, the study will be revised to include stronger language on the importance of providing public access only where it will not impair natural, cultural, or agricultural resources.

Public Concern: The goals analysis [executive summary] is faulty. Under the section on protection of significant resources, the Bixby Ranch is miles away from the Urban Rural Boundary Line. Many of the significant archeological sites and historical resources have already been surveyed on the Bixby Ranch. Under existing regulations, development cannot adversely impact these resources and definitely will not destroy them. Conversion of ranch lands under existing policies and programs to other uses is extremely difficult if not infeasible. If they occur, they would not degrade any historical landscape due to the existing restrictive zoning and environmental regulations in the coastal zone.

Response: The study report states that in the long term, increased pressure from population growth and rising land values near the Urban Rural Boundary Line could result in additional development which could have a cumulative, long-term impact on significant natural resources. This statement does not apply to Bixby Ranch which lies many miles west of the Urban Rural Boundary Line.

Public Concern: The Bixby Plan does not require additional local capacity [proposed in Alternative 2]. It has and will remain protected. Second, both the study and the Environmental Assessment support the conclusion that there has been, and under the Bixby Plan, there will continue to be, effective management of these significant and cultural resources. Third, the Study and the Environmental Assessment, and all of its references, clearly demonstrate that the public already understands the significance of the area. With voluntary scientific and educational programs in place at the Hollister Ranch Conservancy and the proposed Bixby Plan, the public will be involved as they have been in the past.

Response: The draft study report acknowledges the Bixby Ranch Company's stated intention to pursue further conservation measures, and to maintain a substantial portion of Bixby Ranch in agriculture (page 86 of the draft study report). The "Bixby Plan" may successfully conserve the significant resources of the Bixby Ranch. However, the plan has changed over time, and until it is implemented, there is no certainty regarding resource protection. Current easements allow development of up to 45 residential units.

Alternative 2 presents options that may be useful in the conservation of Bixby Ranch resources, as well as elsewhere in the study area. The draft study report recognizes that the study area is diverse, and that different approaches will work in different locations. Alternative 2 allows local public and private decisions to determine what conservation approaches are appropriate in different locations.

Public Concern: After investigating the feasibility of the first component of the Bixby Plan, the parcel reconfiguration, with the Trust for Public Land and others, the owners have decided to drop that component from it. Nevertheless, the owners do intend to proceed with two other components, including placing long term agricultural and scientific conservation easements on the Cojo Ranch to preserve its resources into the future. They also intend to put the balance of the Cojo Ranch not currently in the agricultural preserve program under contract for that program to further protect it [Bixby Ranch] from development.

Response: Comments noted.

Public Concern: Photograph on inside back cover of the study, of the artist in a clump of Gaviota tarplant and painting a seascape, is located on Bixby Ranch without permission from Bixby Ranch foreman. The artist and the photographer taking the picture are trespassers demonstrating a cavalier disregard for private property.

Response: The photographer took the photo from the roadside. This portion of Bixby Ranch was not signed as private property. It is also the subject of discussions between Bixby Ranch and Santa Barbara County Parks

for potential addition to Jalama Beach County Park. The plant in the photo is coreopsis, not the endangered Gaviota tarplant.

Public Concern: Why is this property [Bixby Ranch] being considered for inclusion in a national park, when it cannot be developed? Isn't a national park a form of development in and of itself?

Response: The study was congressionally authorized. The draft study report does not recommend any NPS involvement or designation on the Bixby Ranch. The focus of the National Park System is preservation and conservation of resources as opposed to development.

Public Concern: One of the biggest problems on the Ranch is with people (e.g. trespassing, vandalism, human waste, unofficial trails, fires, poaching, dangerous situations regarding cattle, damage to fences).

Response: Comments noted.

Public Concern: The Bixby Ranch takes pride in being recognized as "pristine." Thank you for recognizing our labor.

Response: Comments noted.

REFERENCES AND ILLUSTRATIONS

Comments in this section include concerns regarding information on maps, photos, and reference documents.

REFERENCES

Public Concern: Commenter previously requested that NPS not rely on the *Gaviota Coast Resources Study*, a report prepared by Santa Barbara County, because of the numerous errors and omissions in it. Recently, the County Board of Supervisors ordered the county staff to mark it “draft only” because of the fundamental defects in it pointed out by the public and in a letter to the NPS. The commenter urges NPS to delete all material in the Study and Environmental Assessment from it because of its numerous inaccuracies.

Response: The Gaviota Coast Resources Study is not a significant source document for this study. It is one of 232 source documents. Of the 442 references, this particular document has been referenced only 6 times. Two instances use its description of the historic ranching landscape, two describe current county policies, and two cross-reference plant and animal species listed in the Appendix. Each instance has been cross-referenced by the NPS through other source documents.

Public Concern: University of California professors cited in the reference section of the study are itinerant lecturers, lacking the status of official university tenured professors.

Response: The two professors listed are Michael McGinnis and Michael Glassow. Michael McGinnis is an Associate Researcher at the Marine Sciences Institute (Ocean and Coastal Policy Center), University of California, Santa Barbara and Michael Glassow is Professor and Chair of the Department of Anthropology at University of California Santa Barbara.

Public Concern: Commenter states that many in the community fear the deficiencies found in the study are due to sloppy work. Some [community members] even contend the cited erroneous “facts” in the draft study report were fashioned to comply with a predetermined outcome. Commenter hopes that the reason for numerous stipulated inaccuracies and shortcomings of the draft study report were a result of inadequate funding.

Response: The public comments on the draft study report surfaced very few factual errors in the draft study report. Such errors have been corrected in the draft study report errata.

MAPS

Public Concern: Commenter would like to see a study map and report that shows the location of areas of public access.

Response: Comment noted. The NPS resource maps include all state and local parks for the study area where public access to the beach is available. See map “Ownership And Zoning” in the draft study report. A map of public access sites can also be found in a recent study produced by the County of Santa Barbara, “A Perspective on Gaviota Resources.”

Public Concern: Commenter questions the validity of Conception Coast Project (CCP) production of maps for both studies.

Comments included:

- Including showing a watershed transitioning over ridgelines in violation of the laws of physics.
- Chumash cities and the Anza Trail are indicated as existing along coastal bluffs (200 years of wave action erosion and at least one recorded tidal wave put the likeliest location of those sites hundreds of yards offshore.)
- CCP also used GIS to map biologically sensitive areas without actually visiting designated locations today, so the data is presumptive.

Response: Conception Coast Project used existing data sources and information to compile maps requested by the National Park Service. They were contracted by the NPS because they are a local organization that had knowledge of GIS data available for the study area based on previous mapping projects that they had completed.

Watershed boundaries were derived from the United States Geological Survey. These boundaries are based on existing topography. NPS has reviewed the maps and did not uncover inaccurate boundaries; however, inconsistencies sometimes arise when combining data from different source maps.

The Chumash Villages are shown on the “Cultural Resources” Map as “Chumash Villages at Historic Contact.” This means that these are the locations documented at the time of historic contact over two hundred years ago. The Juan Bautista de Anza National Historic Trail has already been designated by Congress. The map shows the historic route.

Conception Coast Project used existing mapped data to convey the locations of biologically sensitive areas. The location of species and sensitive habitat shown on the “Natural Resources” map were primarily mapped by the California Department of Fish and Game through the California Natural Diversity Database (CNDDB). The CNDDB is a compendium of highly accurate quality checked data on the location of rare and endangered plants, animals and natural communities in California. See http://www.dfg.ca.gov/whdab/pdfs/Fremontia_Vol_29_article.pdf for more information on this data source.

Additional species and sensitive areas were mapped by resource managers at Vandenberg Air Force Base, and the National Park Service. The NPS used environmental impact reports and recent studies to determine species location. Those studies are cited on page 174 of the draft study report.

PHOTOGRAPHS

Public Concern: Photograph on page 120 said to depict Highway 101 in fact depicts the Pacific Coast Highway in Los Angeles County.

Response: Commenter is correct. There was miscommunication between NPS staff in selecting photos. The NPS revised the photograph caption of the draft study report.

EDITORIAL CORRECTIONS AND OTHER NON-SPECIFIC COMMENTS

This section includes specific editorial comments submitted and other general comments that did not fall into topic areas related to the draft study and its findings.

Public Concern: Page 22, second pp. last line: "Bullito" should be "Bulito"; p. 124, first pp.: "waas" should be "was."

Response: Comments noted. NPS has made the revision.

Public Concern: The NPS Post Office Zip Code numbers differ from one reference to another.

Response: NPS proofreading error. Zip code should be 94607, and has been corrected. Please note that comments sent to the 94702 zip code were delivered properly to the NPS office.

Public Concern: The Gaviota Coast is a special place.

Comments included:

- It is a national treasure.
- One of the most desirable communities in the world.
- Beautiful.
- Loves the Gaviota Coast.

Response: Comments noted.

Public Concern: This area like many others in America has been targeted for 'The Wildlands Project.' This must not happen. What part of Wildlands Project does Gaviota Coast fall into?

Response: The Wildlands Project is a nonprofit organization whose mission is to protect and restore the natural heritage of North America through the establishment of a connected system of wildlands reserves. The Gaviota Coast is within the area of interest of the South Coast Wildlands Project. The Gaviota Coast Feasibility Study has no relationship to the Wildlands Project.

Public Concern: How much of the area would be closed to protect endangered species?

Response: There are no proposals in either alternative to close any areas.

Public Concern: Agencies receiving federal money must comply with the Endangered Species Act. Santa Barbara County employees provided data for the Environmental Assessment, but did not do everything to protect threatened and endangered species.

Response: The commenter misrepresents the Endangered Species Act. Santa Barbara County provided data to the NPS (at no cost to the NPS); however, this action does not trigger any provisions of the Endangered Species Act.

Public Concern: If the NPS manages resources on the Gaviota Coast, continued funding for Santa Barbara County would violate the Endangered Species Act.

Response: There is no new NPS involvement proposed in either alternative.

Public Concern: Thank you for completing the feasibility study. The information within is invaluable.

Response: Comment noted.



The National Park Service cares for the special places saved by the American people so that all may experience our heritage.

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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration