

December 15, 2011

Superintendent Frank Dean
Golden Gate National Recreation Area
Fort Mason, Bldg 201
San Francisco, CA 94123

Submitted via NPS online comment form



Subject: GGNRA Marin Equestrian Stables Plan and Environmental Assessment

Dear Superintendent Dean,

Marin Conservation League appreciates the opportunity to submit comments on the Marin Equestrian Stables Plan (Plan). We have reviewed the environmental and public benefits of the "Preferred Alternative" and the "Environmentally Preferred Alternative" and find that we can support Alternative B Option 2 as the Preferred Alternative, which maintains three existing viable facilities that can be managed in a manner that is sustainable (in accordance with the Plan's definition of that term), protects natural resources, and affords public access benefits.

MCL also appreciates the accomplishments of this comprehensive planning process. At a minimum, it brings together an impressive amount of data on the existing stables and their conditions as well as the conditions of other potential sites that could be considered in the future. It also establishes Best Management Practices and other natural and cultural resources standards that can be applied to all stables as appropriate; and it is consistent with the Draft General Management Plan's chosen mission to Connect People to Parks.

In keeping three stables in their present locations (Presidio Riding Club in the Headlands, Miwok Stables in Tennessee Valley, and the Golden Gate Dairy Stables at Muir Beach), the "Enhanced Existing" Alternative B Option 2 will preserve long-standing and traditional equestrian presence in the park and respect the work of those who have already committed their efforts to maintain and improve these facilities. It would appear to be a minor change to relocate the Park Horse Patrol out of Lower Tennessee Valley to the Tennessee Valley Stables under this alternative.

We recognize that Alternative C is identified as environmentally preferred in that it would remove both the Golden Gate Dairy Stables and Lower Tennessee Valley Horse Patrol facility, leaving only two stables with the potential for environmental impact. This alternative would eliminate most future concerns about protecting the Redwood Creek watershed from a possible source of pollution. At the same time, it would also remove a traditional public use that has been a recreational and cultural asset for almost 50 years, before the Park was

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established. Alternative D would allow for expansion of facilities and number of horses. We feel that the natural resources and sensitive habitats of the Park currently tolerate the present number of horses with minimal impacts, and that with improved BMPs, the existing carrying capacity is a good balance between animal use and resource protection. Therefore, we see no justification for expansion of facilities as proposed under Alternative D.

Recommendations

1. Although we support Alternative B Option 2 in most respects, we also suggest a possible variant. The National Park Service (NPS) has an effective Volunteer Mounted Patrol that offers many public benefits. These include increased visitor safety and resource protection and an opportunity for economically positive public relations. Park service horses and their riders can enhance the official presence of the Park officials and enhance the connection between people and the park (the theme of the Draft GMP's preferred alternative) by using horses as a magnet for visitors, especially kids. In order to expand the patrol and the number of horses, it would need an appropriate facility. The current location in Lower Tennessee Valley is nearly ideal. A new facility at the Marincello site would be even better.
2. The best management practices for manure storage and disposal outlined in Appendix B make no attempt to address the final destination of this valuable resource. Rather than hauling it away ("to some non-NPS composting facility"), the plan should encourage a more enlightened use within the vicinity of the GGNRA. One has only to visit the food growing fields of Green Gulch Ranch and their composting activities to fully appreciate the arrangement through which Golden Gate Dairy Stables' manure goes to Green Gulch for use in their gardens. Horse manure is not waste, nor is it toxic – it is a valuable soil amendment.
3. Table 2-11 (Description of Alternatives Considered but Eliminated from Further Study) lists among others the option of "Grazing pastures at all sites – to revisit or allow horse grazing around stables," and the Reason Eliminated column responds as follows: "Prior NPS decision eliminates grazing pastures at these Marin sites due to erosion and sediment impacts." It is our belief that this blanket decision of many years ago was based on incomplete and now out-dated information. As a consequence, much of the parkland is covered in dense flammable brush.

This decision should be revisited with appropriate expertise. On the basis of observation, we believe that it is possible to have environmentally acceptable equine grazing programs (managed, rotated, seasonal, etc.) that enhance habitat for native species, particularly native grasses. Horses do not have the same habits as cattle. The downside is that monitoring grazing requires extra management. The benefit is that grasslands that have been invaded by brush may begin to resemble conditions before the wholesale removal of all grazing. The possibility of limited carefully-managed pasturing should be left open by the Plan for further study, rather than precluded forever. And from a public perspective, people DO like to see horses grazing on hillsides.

4. MCL has not studied the operational aspects of specific stable facilities that are considered in the Plan. However, we have discussed in some detail the Golden Gate Dairy Stables, in that its location is in the particularly sensitive Redwood Creek watershed. The programs and best management practices implemented by Ocean Riders over the years are commendable and could serve as a model for other stables in the Park. Therefore, we recommend that you give close attention to their letter of comment. In particular, we support their request to upgrade the front stalls to blend architecturally with the historic buildings rather than relocate them. Using the existing footprint would reduce the need for further potential ground disturbing activities associated with rebuilding and is therefore the more economical choice. Further, the stall appearance could be improved from an historical perspective to complement the weathered hay barn or any chosen historical building. Above all, it would be a mistake to dismantle any waste or water management facilities that are now in place and compromise standards necessary to greatly reduce or eliminate impact on the Redwood Creek watershed. There are operational advantages of maintaining the stalls in their present location that serve the health and well-being of the horses themselves and also appeal to the public.

We want to thank you again for your work on this Plan, and we look forward to continuing to working with the Park on a range of resource management issues.

Sincerely,



Nona Dennis, Chair, Parks and Open Space Committee