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2017 OCT 30 PM 12: 35

POINT REYES NS

Comments on GMP Amendment Process

I feel that the proposals are adequately fleshed out to include all relevant points and I have no criticism of the process suggested.

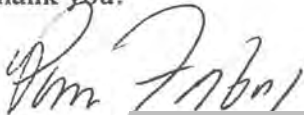
I do, however, wish to express a strong preference for two proposals (**Continued Ranching and Management of the Drakes Beach Tule Elk Herd (NPS Initial Proposal)**, **Continued Ranching and Removal of the Drakes Beach Tule Elk Herd**).

Ranching is an integral and historic part of Point Reyes National Seashore and a model for proper ranch management and for creative diversification.

RE: Elk: I think it's unfortunate that the park released the Tule Elk into the park proper creating a problem for itself down the road. I would hope that those wishing to return the park to "wilderness" would understand that these elk are not native to the area any more than the axis and fallow deer were and that the dream of "wilderness" is just that.

It's important to keep historical ranching as an active part of the Park and I feel the two alternatives listed above could do that very well.

Thank you.



Pam Fabry, 

October 26, 2017

To: Cynthia MacLeod—Point Reyes National Seashore

It has come to my attention that the National Park Service wants to change the reason why Point Reyes National Seashore was established. The end result being the elimination of ranching and dairy farming with the establishment of more wilderness.

Point Reyes National Seashore was established to provide open space and outdoor recreational opportunities for residents of the Bay Area. Congress established Point Reyes National Seashore as a recreational Area not a National Park. The reason was clear; Congress did not want the Seashore to be managed under the strict rules that govern a National Park. Wilderness is very restrictive and eliminates a number of uses that may be needed to maintain the Seashore in an open, usable and safe condition. Mechanical equipment use will be necessary for fire suppression, heavy brush removal, trail up keep, search and rescue operations, etc.

Cattle ranching and dairy operations were allowed to continue, with a lease back arrangement, which helped keep the county economy and labor force employed, and provided meat and milk for the central portion of California. The spin off from the ranching operations involves many other business activities. These business provide employment for a number of people in the local area. By eliminating the agricultural operations the NPS is not considering the loss of employment by a number of people in surrounding area who the haul, feed, equipment, livestock, whole milk, Clover milk pasteurizing and bottling operations, feed production, equipment repair and veterinary services and many other services.

Flexibility in NPS management is required. To be effective NPS managers need farm/ranch education in order to carry out ranch management plans and to communicate effectively with the different ranchers in order to carry out various ranch projects. In depth educational needs include degrees in soils, wildlife, range management, ranch management, fisheries and forestry not general biology. The NPS never did step up to the plate and appoint top seashore managers with this type of educational and experience background. The end result is a constant tug of war between Seashore Managers and seashore farmers, ranchers and fisheries business.

When the National Seashore was originally purchased by Land and Conservation Act funds there were two species of non-native deer roaming the Seashore farm lands. These deer were obtained from a local zoo and were put on the seashore by ranchers for hunting purposes. The deer species were Fallow deer originally from Europe, and Axis deer originally from Asia.

The deer had multiplied into fairly substantial herds by the 1960's and competed for grazing on several ranches. The Park Service instituted a study where both species of

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POINT REYES NPS

deer were shot and autopsied to determine food usage, general health, parasite problems and diseases that may affect grazing cattle. Along with the non-native deer, Black-tail deer were also, collected for comparison purposes. The Axis and Fallow deer were found to be very healthy with very few parasites. The native Black tail deer who are browsers were full of parasites; tape worms, liver flukes, etc.

Those deer shot were given to a food kitchen in San Francisco in dressed carcass form. After the study, the NPS went out and shot all of the remaining exotic deer.

In the Mid 70's, Tule Elk were being discussed. It was determined by the NPS that Point Reyes would be a good place to locate the Tule Elk since they were supposedly native to Point Reyes in the early 1800's. The elk were to be placed on the Pierce Point Ranch. Fencing was placed across the point but elk soon forced their way through or swam around the fence in Tomales Bay.

Elk are many times more difficult to manage than deer. They are difficult to herd and keep in designated areas. To be confined in a certain area, elk will have to be constantly monitored and removed to keep the herd size in check. Disease and parasites will have to be continually looked for; in breeding will become a problem and have to be attended to. If the NPS thinks that removing the ranchers will solve their elk problem they are sadly mistaken. Wilderness is not an option.

In conclusion, I am against eliminating ranching and farming from Point Reyes National Seashore. I am also against changing the nature or designation of the Seashore so that it is no longer an open space for the San Francisco Bay area to recreate is wrong. Cutting out profitable business does not make sense in a day and age when we are trying to put the economy of the U.S. back in order. By not renewing the leases makes it harder for the ranches to operate and borrow money need for improvements in ranch operations.

The NPS lied when it closed down the Drakes Bay Oyster Farm. The NPS used material that had been continually determined to be false. This company did no wrong, they were very profitable. The Oysters actually cleaned the waters of the bay while growing. No entity public or private should be allowed to benefit from false information in a court of law. It appears that the NPS is attempting to get rid of the ranches and lessees under the same guise.

The government goal must be good resource management by well educated public servants. Communication between all parties will be better facilitated. If after approximately 60 years the National Park Service cannot seem to rise above the fray; then perhaps another Natural Resource Agency, with qualified ranch/resource management personnel should take over management.

Andrew R Gifford

Former National Park Ranger, Point Reyes National Seashore



Andy & Jan Gifford

© Jan Gifford

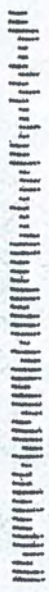
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GMP AMENDMENT 40 SUPERINTENDENT
POINT REYES NATIONAL SEASHORE
1 BEAR VALLEY RD.
POINT REYES STATION, CA. 94956

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10/31/17

To and for ~~Point Reyes~~ National Park:

Lin for Wilderness and all things wild. Let the Tule elk roam freely throughout the park and beyond (across Highway 1) and onward to Bolinas Ridge and Mt Tam. Have plenty of warning signs to let people and drivers know about large animals on the roads.

The Ranches have had their day. Its time to move the cattle out of the Park and make it truly wild for native animals and plants. To see what I would term over grazing year after year is not consistent with good land management. We need to clean up the mess left by the ranches, make a concerted effort to get rid of the invasives and plant natives like at Giacomini wetlands and the GB-NRA lands around Bolinas lagoon and beyond without the use of pesticides or herbicides.

Thank you for making this a new day for our beautiful Point Reyes National Seashore.

~~William H. Hall~~
Bolinas

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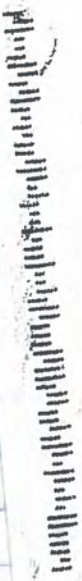
2017 NOV -2 PM 12:49

POINT REYES NS

Point Reyes G-MP Amendment
Bear Valley Rd.
Point Reyes Station, Ca
94956



Walter Hoffman



[Faint handwritten notes on the left side of the envelope, including 'Point Reyes', 'Bear Valley Rd.', and 'Point Reyes Station, Ca']

[Faint handwritten notes on the right side of the envelope, including 'The use of...', 'and the...', 'James Lagon and...']

[Handwritten signature 'Walter Hoffman' at the bottom left of the envelope.]

October 23, 2017

Dear Cynthia MacLeod,

I received your letter of October 16th regarding a General Management plan, and with the note that you are going digital. I'm an old native San Franciscan born 90 years ago this month and I am not on the Internet.

In any case I would like to take this opportunity to thank you for all the service you and the Park Service have done for the people of the Bay Area and the world in the fifty odd years since you began the wonderful project of keeping this beautiful coast pure and free of invasive species like developers and white deer. At the same time you have preserved the fine elements like the Vedanta Society religious retreat and the responsible ranchers, and made the land welcoming to visitors.

Good luck to you in the future.

Sincerely,

Riothy Mardock

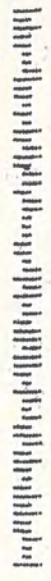
SAN FRANCISCO CA 940

OCT 2017 PM 5 L



*attn:
Cynthia
mae Reed*

*Point Reyes CMP Amendment
1 Bear Valley Road
Point Reyes Station, CA
94956*



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Oct 21, 2017

2017 OCT 25 PM 1:06

Park Superintendent

Point Reyes National Seashore

POINT REYES NS

Dear Park Superintendent,

The demise of the Drake's Bay Oyster Company was an indicator that the Park Service has little to no interest in co-operating or co-existing with any commercial enterprise. All research aside, it is clear there is a pre-existing bias of the Park Service to pull away from any alliance with farmers, ranchers and in general any commercial or private citizens ^{with space} leveraging and renting from the Park Service.

The people who are leasing land are also stewards of those areas. They maintain acres of land that create a bucolic environment in Marin and Sonoma counties.

The farmers and ranchers are making decisions in conjunction of environmental protections. The bias, which have been and probably are pre-determined by

(2)

The Point Reyes Seashore Park Service Personnel have a history that is remembered specifically from the Arch's Bay Oyster Co. decision.

The hearings on Oct 25 and 26, 2017 are an opportunity to listen to the people. I am unable to attend those Public Meetings and so I am sending this letter to you.

I support co-existing and cooperating with farmers and ranchers. I urge the Park Service to listen to comments.

I support the alternative to allow existing ranch families to continue beef and dairy operations w/ 20yr lease/permits. Managing tule elk is important as well. There is only so much vegetation so native deer should be given priority.

Cooperate & co-exist.

Sincerely,

SINKKONEN

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Sinkkonen

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2017 NOV -1 PM 12:16

POINT REYES NS

Sparks/Torquemada
558 Creekside Road
Pleasant Hill, CA 94523

October 26, 2017

Dear Ms. MacLeod,

We have spent a lot of time reviewing the Point Reyes National Seashore General Management Plan and have some grave concerns regarding amending this plan.

1. We are vehemently opposed to any plan that would significantly impact or eliminate the Tule elk herd. The elk have been successfully reintroduced after being exterminated in the 19th century. This is their natural habitat and we would prefer the cattle and dairy ranches be removed in a respectful and timely manner from the Point Reyes National Seashore (PRNS) so the elk/cattle conflict issues are no longer a problem.
2. We are totally opposed to any additional farming or ranching leases being granted in the Point Reyes National Seashore. We are in PRNS on a regular basis and our main concern is any additional encroachment from humans and domestic animals (cows, chickens, sheep, farm dogs, etc.) will significantly impact the native wildlife such as bobcats, coyotes and badgers. This is one of the few pristine places where these predators can safely exist and not contend with human influenced intrusion, which would significantly impact their survival.
3. PRNS took a strong stand to remove the oyster farm on this land, based on the need to protect the diminishing seashore and re-establish the natural habitat of the shoreline. **Why not take a strong stand against further development of the land in PRNS?** Allowing additional land to be leased for farming, cattle or dairy seems contrary to the vision of why PRNS was formed. It clearly states that PRNS was created to "save and preserve for purposes of public recreation, benefit, inspiration, a portion of the diminishing seashore of the United States that remains undeveloped."
4. The PRNS is a very special place that provides a rich ecosystem for the public to enjoy while observing an abundance of wildlife. We do not want to see more of the land scarred by human encroachment.

Sincerely,

Wendy Sparks
Jeff Torquemada

A large rectangular area of the document is redacted with a solid grey box, obscuring the signature and name of the sender.

CreekTrail Ranch

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2017 OCT 30 PM 12:39

POINT REYES NS

October 25, 2017

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Dear Superintendent,

I am writing to support the alphabet ranches as they are today at Pt Reyes National Seashore. I believe this historic use of land is appropriate for several reasons, including continuity, which should not conflict with national policies.

I am an equestrian, and have been pleased to enjoy the configuration of ranches as they are. We have easy access to ride horses on those properties, which offer unique recreation and views of the magnificent seashore, with lots of fingers and bays. The comingling with wildlife is awesome. I recall riding on one of these shoreline ranches with a group of equestrians and witnessing a mountain lion in pursuit of deer, unaware of our presence, on a finger of land across a small bay. I proffer that this experience reflects a proper use of these lands, which have only prospered in the hands of local ranchers as stewards.

These ranches represent generations of agricultural use, dating back to early settlements of America. From the time of Spanish land grants, hardworking immigrant families established their dairies and pastures, feeding the SF Bay Area and caring for the land. There is no conflict with nature here; rather, the sensitive care provided by local farmers and ranchers allows a wonderful symbiosis which is an entrenched part of Bay Area history.

While some purists lacking local experience may opine that this land should suddenly be pristine with limited access by their mandate, I would ask them to show me the damage caused by human presence and agriculture, which have existed here long before any current opinion makers arrived on the scene. The San Francisco Bay Area is on everyone's Top Ten list of amazing places in the world, as it is and has been for centuries. These lands are prospering as they are, so there is no legitimate cause for change.

The American people are the true owners of these lands. Those of us who frequent them and know and love them well, speak first hand from regular visits and informed use. We wish for them to remain in their historic use, which, thanks to the farmers care, is pristine, accessible and appropriate.

Sincerely,


Edward P. Weber

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2017 NOV 15 AM 10:33

Comment Form

Park: Point Reyes National Seashore

Project: Point Reyes National Seashore and North District Golden Gate National Recreation Area General Management Plan Amendment and Environmental Impact Statement

(ID: 24313) POINT REYES NS

Document: 2017-10 General Management Plan Amendment Newsletter

(ID: 83408)

Point Reyes GMP Amendment
Superintendent
1 Bear Valley Road
Point Reyes Station, CA 94956

* indicates required fields

City: [REDACTED] [REDACTED]
[REDACTED] [REDACTED]

First Name: Middle Initial:

Last Name:

Organization:

Member Official Representative

Address 1:

Address 2:

Country:

E-mail:

Comments or Requests:

I urge the NPS to prioritize the park, its wildlife, and recreational access over ranching consistent with the mission and spirit of our national parks.

While I recognize and applaud the vital contribution made by ranchers when the park was created, there were no agreements to maintain ranching beyond the lifetimes of the ranchers who willingly sold their lands (or in some cases leases) to the Federal government for the purpose of establishing the National

Seashore. National Parks have typically offered Reservation of Use leases to property owners enabling them to remain on park lands for a set period (up to 40 years) and/or the remainder of the lifetime from the original land owner. I don't believe any circumstances exist which, over fifty years since the park's creation, would justify extending leases beyond the lifetimes of those who originally sold their land.

Therefore I would argue for the General Plan to establish a timeline for a phase out of ranching. I fear that political pressure from politicians who are responding to local interests will have undue influence on a decision which should focus on the broader implications on national park policy.

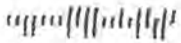
The current options which include killing, or severely limiting, native wildlife in favor of for-profit activities runs counter to the spirit and founding legislation of our national parks and would set a terrible precedent for other national parks that are facing similar pressures from local interests. The ranchers aggressive lobbying (which includes numerous signs along our roads urging local residents to choose their for profit interests {cows}over native wildlife {elk}), the construction of expensive fences to protect their stock is an outrage and a warning for how they will manage future disputes.

The public has a right to know how much ranching subsidies cost each year and why, after over fifty years, taxpayers should continue to fund them (as well as proving below-market leases) as they clearly impair the flora and fauna of the park due to numerous factors including erosion, introduction of non-native species, pollution, and fencing. And ranching not only impairs lands within the park, but water bodies both inside and outside the park's jurisdiction such as Tomales Bay where the RWQCB has identified numerous pollutants related to ranching—including those lining the shore of Tomales Bay and within the park including designated Wilderness areas in Drake's and Limantour Estero.

I also urge the rejection of the option under consideration that would enable ranches to diversify their for-profit activities in order for them to remain viable. This proposal further amplifies the degree to which supporters of continued ranching are willing to trample on long-established principles eschewing for-profit enterprises in our national parks and should be rejected.

Finally, if an extension of ranching leases is to be extended I urge that a set time frame be established up to but not to exceed twenty years after which time it is mandated that no further ranching in the park will be permitted.

At a time when thousands of our neighbors have been burned out of their homes and funding for their needs is limited, I think it is unconscionable for our local politicians and Congressional representatives to argue for continued funding for a subsidy that has run its course. Taxpayer dollars do not grow on trees, and our National Parks will not thrive on for-profit schemes.



11/7/17

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POINT REYES NS

To Whom It May Concern:

I support taking any and all actions to support and problem solve issues in order to maintain Dairy + Beef operations in P.R.N.S.

If we can't solve problems in this community of creative minds and resources then we are in trouble. We must find ways to maintain our ranching operations, to provide food, jobs, & services to the locals and the country. We value our historic heritage and the Park has a duty to uphold their mission.

P.R.N.S. is under increased pressure on our resources by a constant increase in tourism. This has a bigger impact on the environment here. There is no need to refer to open space out here as 'Wilderness' - There is no wilderness - it's a park. It's open space to be shared & maintained in the best possible way rather reason. Human activity should also be considered as the impact to the environment, and managed.

The Ranches are already micro-managed and doing their part in the agreement they have with the Park. They need to be valued and supported.

Sincerely, Laura Amst - P.R.S.

John Smith



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2017 NOV 15 AM 10:33

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POINT REYES NS

November 9, 2017

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Cynthia MacLeod
Acting Superintendent
Point Reyes GMP Amendment
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Subject: County of Marin First Phase Comments on the Point Reyes National Seashore General Management Plan Amendment

Superintendent MacLeod,

Introduction

The County of Marin embraces the first phase of the General Management Plan Amendment (GMP Amendment) process for the Point Reyes National Seashore (PRNS) and north district of Golden Gate National Recreation Area (GGNRA) as a seminal opportunity, and our responsibility, to again fully partner with the National Park Service (NPS). Through our combined leadership we can secure West Marin's open and connected landscape for the fundamental, integrated, and necessary role of human communities in the environment.

Marin County agriculture is recognized as a leader in California's agricultural sustainability movement and local food security. Farming and ranching in PRNS and GGNRA contributes to the stability of our entire County of Marin farm system. Point Reyes National Seashore ranches and dairies account for nearly 20% (\$20 million) of all gross agricultural production in Marin County. These ranches and dairies play a critical role in maintaining the viability of Marin County agricultural infrastructure and economic viability. Application of an Economic Input-Output Model to NPS farms and ranches would have an economic multiplier impact of nearly four (4) times the gross production values, or \$80 million.

The Marin County Board of Supervisors considers it a privilege to continue the legacy of our predecessor, Peter Behr. Through his leadership and collaboration with many instrumental partners, PRNS and GGNRA came into existence. Paralleling the steps and actions taken to make this possible are Marin County's precedent setting land use policy actions to preserve Marin's complementing private agricultural lands and strategically support their viability through diversification in agricultural production in our Countywide Plan. We have put these policies in place for the same purpose and goal that there is ranching on PRNS and GGNRA – that is, to support and embrace sustainable, viable, and environmentally friendly farming that protects the land, water, and history of our agricultural community.

Accordingly, we express our full and unequivocal support for the continuation of viable livestock grazing, dairy production, and diversified agriculture on the fullest expanse of

PRNS and GGNRA pastoral area. Marin is only now fully understanding and benefiting from the critical role ranchers and farmers have as partners in achieving our shared goals. In developing GMP Amendment alternatives, the farmers' and ranchers' role as managers should be elevated because they represent the most direct connection to and provide the management needed to maintain and enhance the pastoral cultural landscape of PRNS and GGNRA.

Specific Comments

These same local farm families have upheld for nearly 40 years (1978 Public Law 95-625) their promises to manage natural and cultural resources in a manner consistent with agricultural lease/special use permits issued and audited by PRNS. They have met detailed and specific range management program activities, terms and conditions. This includes compliance with San Francisco Regional Water Quality Control Board's water quality regulations for grazing livestock and dairy operation. Similarly, Marin County completed its Climate Action Plan Update in 2015, and Marin agricultural has demonstrated that it can be an important part of the solution to climate change through carbon farming and carbon offsets. An entire chapter was dedicated to agriculture in the Action Plan.

We value the many benefits to our community that working ranches and farms provide, such as creating jobs that help sustain our rural West Marin Communities, including our schools, churches and other important organizations. We ask that any considered alternatives consider all of the benefits that ranchers contribute.

The absence of clear guidance for agricultural operations hinders the decision-making ability of the rancher and NPS staff field-level relationships. The needs to repair fences, reroof barns, and manage invasive plants are a few examples of operational decisions that often are delayed. These delays have had financial and ecological impacts. Alternatives in the GMP Amendment will be stronger and have increased success in realizing the mutual benefits of working farms and ranches if they include guidelines to facilitate ranchers and NPS making real-time operational decisions. This is the operational flexibility that the field level partnership between the ranches and staff require to be successful.

Marin has enjoyed and benefited from a broad partnership of agricultural support organizations. This has included Marin County departments such as the Agricultural Department, Community Development Agency, and Cooperative Extension. Federal agencies such as the United States Department of Agriculture Natural Resources Conservation Service and the National Organic Program are integral to this partnership. So too are community based organizations like the Agricultural Institute of Marin, Marin Agricultural Land Trust, and Marin Resource Conservation District. This partnership has provided the combined complementing missions and expertise in land use policy, agricultural and natural resource management, marketing and outreach, and education to accomplish precedent setting land conservation, environmental stewardship projects, and value-added farm production. PRNS and GGNRA Staff have been collaborators and partners on these innovations and accomplishments. To replicate these successes, we recommend that considered alternatives provide for the inclusion and enhancement of this partnership and its ability to implement integrated farm production and environmental stewardship solutions. Succession is critical for the

perpetuity of agriculture's management and stewardship contributions. Marin has benefited from successful transition from one generation to the next through as many as five family generations. Additionally, hand-offs of agricultural property and operations to non-family members have gone successfully with agricultural production and environmental stewardship persisting. We hold successful succession from current to future agriculturalists fundamental for the continuation of Marin's valued pastoral landscapes. Because of this, we recommend that any alternatives have a plan for succession to new members of existing farm families and alternative agricultural candidates if that option is not presented.

Diversification is a proven tool for the economic viability of both individual ranches and the broader community and it is a recognized and supported tenant in the Marin Countywide Plan. Diversification has enabled Marin's small and medium sized farms to be economically viable, build additional resiliency, and to avert the risks of business failure. This is especially important because these ranches do not benefit from economies of scale that larger operations enjoy. In effect, diversification has strengthened Marin's local family farms, local economy, and local food system. As a result, and for these reasons, diversification on the PRNS and GGNRA ranches and dairies should be fully considered in any analyzed alternative so that it can be facilitated going forward. This includes selected crop production, forage production, farm sales, farm processing, farm stays, and farm tours.

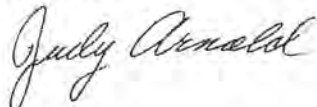
Grazing livestock and free-range elk are not compatible, evidenced by the ongoing experiences of PRNS ranches. Tule Elk are impacting ranchers. The main herd, consisting of females, juveniles, and a few males, and male bachelor groups, spend time on A Ranch, B Ranch, C Ranch, E Ranch, and the former D Ranch. Because they have migrated beyond the fenced wilderness boundary area onto ranch land, they compete for feed and water resources intended for livestock, disrupting operations, and increasing operating cost, while potentially exposing the livestock to disease pathogens (Johnes). Wilderness designated lands and Pastoral/Ranch leased lands should be given equal protection corresponding to their intended use and purpose. Wilderness Areas are intended for displaying nature and the "Resources Specialist" to manage, whereas the Pastoral Areas are intended to be managed for agricultural use by the "rancher". There should be little allowance for commingling resource use and management styles between them. When livestock are found in Wilderness, they are removed. Likewise, when Elk are found in Pastoral Zones, management methods should be used to control their population and remove their impacts.

The connections between the GMP Amendment planning area with other portions of PRNS and GGNRA and the broader region are strong. The six dairies in the planning area are 20% of Marin's remaining dairy farms, shipping to local dairy processors such as Straus Family Creamery and Clover Sonoma. The free-range elk in the planning area originated from the herd in the adjacent Wilderness and are influenced by resource conditions there. Visitor experiences and opportunities are among the menu of options across the entire Seashore with the quality and extent of road, parking, and trail networks influencing access to these options. We ask that, beyond the minimum required of the GMP Amendment Settlement, alternative analyses make consideration of these connections and incorporate the options for solving management conflicts and improving overall experiences that exist outside the planning area.

Closure

The GMP Amendment presents an important opportunity to celebrate the outcomes and endowment resulting from decisions made more than 50 years ago. We can do this best by reaffirming our commitment to an evolved understanding of humans' fundamental role in the environment, exemplified by all of Marin's working ranches and farms. We stand ready with the National Park Service, PRNS and GGNRA ranchers and farmers, and Marin's broader community to achieve this shared goal.

Respectfully,



Judy Arnold, President
Marin County Board of Supervisors

Cc: Senator Dianne Feinstein
Senator Kamala Harris
Congressman Jared Huffman

Comments regarding the GMP Amendment:

I feel strongly that cattle & ranching families should NOT be removed completely from the park planning areas.

I have seen the negative effect of on native plant communities where cattle have been removed.

Elk do not graze on many of the introduced species that cattle control by grazing. Examples are forage radish, agricultural mustard, + velvet grass.

We cannot return to pre-european times and the land should be managed with grazing to maintain native plant communities.

The old Hall Ranch has been over run by weeds since the removal of cattle there. Also the area between the main rd + Kehoe Beach is all weeds now.

Tomales pt. has a small fraction of the native plant communities that flourished there with cattle.

I would support the option of allowing ranchers to convert to Beef ranching instead of dairy farming.

Also improving farming practices should be ongoing.

Cultural burning may be very beneficial to Native ecosystems.

Your Name: _____

Molly Boyce

Mailing or email address: _____

Organization (if applicable): _____

Member

Official Representative

(circle one)



Providing Comments

Please submit your comments online using the NPS's Planning, Environment, and Public Comment (PEPC) web site at: <http://parkplanning.nps.gov/poregmpa> or use the reverse of this page to record your comments and ideas.

Below are some questions for your consideration as you prepare your comments:

- How can Point Reyes protect and manage the diverse and important natural and cultural resources in the planning area? Are there opportunities that could enhance future stewardship in the planning area?
- What types of visitor experiences, activities, and facilities should be available in the planning area?
- What types of specific strategies can/should be considered for managing agricultural lease/permits?
- What types of specific strategies can/should be considered for managing tule elk?

Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment—including your personal information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

The public comment period is open through November 15, 2017.

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Pt. Reyes Station, CA 94956



DEPARTMENT OF
AGRICULTURE, WEIGHTS AND MEASURES

Promoting and protecting agriculture, environmental quality, and ensuring equity in the marketplace.

Stacy K. Carlsen
AGRICULTURAL COMMISSIONER
DIRECTOR OF WEIGHTS AND
MEASURES

November 13, 2017

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CRS Dial 711
www.marincounty.org/ag

GMP Amendment
c/o Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Re: Point Reyes National Seashore General Management Plan
Amendment

RECEIVED
2017 NOV 15 AM 10:32
POINT REYES NS

Dear Superintendent Cynthia MacLeod,

I greatly appreciate the opportunity to comment on the Point Reyes National Seashore (NPS) General Management Plan Amendment (GMPA). I recommend ***GMPA Alternative #5 "Continued Ranching and Removal of the Drakes Beach Tule Elk Herd"***.

Food, People Place

"The social basis for a democratic food policy lies in movements for employment and incomes, for safe and nutritious food, for environmentally sensitive agriculture (including treatment of animals) and for democratic participation ... Democratic principles ... emphasize proximity and seasonality – sensitivity to place and time. This means the use and development of technologies and markets to facilitate local enterprises in every link of agrofood chains. What is increasingly clear is that healthy food and environmentally sound agriculture must be rooted in local economies". (Friedmann 1993)

Point Reyes National Seashore Agriculture – An Economic Model of Necessity

Marin County agriculture is recognized as a leader in California's agricultural sustainability movement and local food security. Farming in the Point Reyes National Seashore (NPS) contributes to the stability of our entire County of Marin farm system. NPS ranches and dairies account for nearly 20% (\$20 million) of all gross agricultural production in Marin County. These ranches and dairies play a critical role in maintaining the viability of Marin County agricultural infrastructure and economic viability. The farming fabric infiltrates into every phase of community activities and virtually all economic transactions. Application of an Economic Input-Output Model (EIO) to NPS farms and ranches would have an economic multiplier

impact of nearly four (4) times the gross production values or \$80 million. The total gross Marin County agricultural production in 2016 was valued at greater than \$100 million (\$400 million total under the Input-Output Model). Marin is principally a grass based agricultural system where livestock and livestock products accounts for greater than 72% of the gross values equaling \$72 million (\$288 million EIO). The GMPA must evaluate the economic impact of losing 20% (\$80 million) of the total agricultural output for the county, including the impact on the remaining agricultural and infrastructure serving all other agriculture including services operations in the region. County-wide milk production accounts for 40%, cattle for 13%, poultry for 12%, pasture for 11%, aquaculture (oysters) for 6.5% and vegetables, lamb, silage, grapes, and nursery products make up the balance of the gross production value. It is essential the GMPA establish economic measures identifying agricultural resources including local community benefits and economic contribution of PRNS dairies, livestock, and other agricultural outputs.

The PRS Ranching Background and Needs

There are 16 livestock ranches and 6 dairy operations in the NPS. Ranching and farm culture in "West Marin Point" has gone on for over 150 years. Their history stems from the "Gold Rush-49er Era" and framed by the "Shafter Era" giving way to today's multi-generations family operations.

Historically, farms in the "Seashore" have practiced all forms of agriculture. County of Marin Agricultural Crop reports show during the 1930-1950 a diverse production of fruits and vegetables in addition to today's livestock, poultry, and dairy operation. Diversification is a key aspect that NPS ranchers need to remain economically viable. The Park Administration should evaluate the benefits and support diversification, value added practices, and limited amount of processing consistent with regional allowed activities generally accepted outside the National Seashore boundary.

Interestingly, all dairies in the Seashore area are Certified Organic under the United States Department of Agriculture, National Organic Program (USDA, NOP) certified by the Marin County Agricultural Commissioner and other accredited organic certifiers demonstrating the progressive nature and willingness to support animal health, land stewardship, and environmental protection as mandated by the NOP. These practices and programs enhance existing PRNS environmental standards and with further review and adoption of these standards would generate an improved outcome of the GMPA. The general public trust the integrity of "organic" so should the NPS. Collectively the entire Pastoral area of the NPS Agricultural region represents one of the largest contiguous organically certified areas in Marin County, California, possibly the nation. This is a pinnacle in terms of production model and land sustainability and stewardship. This productivity coupled with the high biodiversity, ecological quilt, edge effect of multiple habitats, and topography gives exceptional resiliency for both agriculture and natural systems to flourish.

This General Management Plan Amendment should recognize farm sustainability, production, marketing of the agricultural products raised in the NPS and to educate the public about the compatibility of farming and nature.

The Point Reyes National Seashore should acknowledge ranchers for their land management and stewardship.

This recognition would be in the form of adopting the ***GMPA Alternative #5 "Continued Ranching and Removal of the Drakes Beach Tule Elk Herd"***.

Models for allowing these activities are identified by many highly successful local and regional farming businesses including value added cheese and other dairy processing activities. In addition, many local codes and policies and non-profit organizations established in Marin County support agriculture. The Marin County General Plan and the subtending "Agricultural Element", "Grass-fed Beef Ordinance", "Organic Farm Certification Ordinance", "Prohibition of Growing GMO's Ordinance", "Right To Farm Ordinance" and guidelines identified in Marin County Local Coastal Plan reflect the overall support of farming and natural resources protection. There are no higher standards for land use protection policies. Evaluation and adoption of these particular programs would improve overall performance and support of Seashore Ranchers and should be included in the GMPA. Inclusion would be consistent with farming activities outside the NPS and offer a consistency in regional farming policies.

Seashore ranchers are commercial operations competing with regional farming operations. They are not Hobby or Boutique Farms! They need the flexibility to create an identity for their regional products, a collaborative Seashore-Rancher Brand, i.e., "Seashore Rancher Cheese", etc. and the National Seashore should endorse and support such efforts. The NPS resides in Marin County where the local food movement has shaped our views of what organic agriculture really stands for, seriously investing in local grown and consumed product, knowing your "farmer" and recognizing the importance of **our** farms sequestering carbon closing the gap on carbon emissions and global warming. Allowing farms in the National Seashore to produce value added products, and sell local will demonstrate the willingness to "walk the walk" while lightening our carbon footprint. Losing any family farm operation, or limiting their ability to remain competitive, jeopardizes the economic viability of our entire agricultural system in Marin County.

Administration and Ranchers Share Compliance and Best Management Practices

The ranchers in the Seashore have basically the same challenges. They are trying to maximize the Coastal Prairie Grassland (Pastoral Zone) to produce livestock and dairy products for sale. Ranchers are "Land Managers" responding to changes in their social, political and economic conditions while finding means of bringing them under control. Ranchers in this state or condition have complied with NPS policies and mandates and improved the value of land through stewardship and BMP's for

land management in partnership with NPS scientist/managers. Working in concert many restoration and improvement projects have been completed resulting in net benefits concerning local and downstream events. This land management team has together applied known or discovered skills to land in such a way to minimize or repair degradation, and ensure the capability of land is continued into the future. Ranchers are sensitive to land protection and have built resilience into agricultural system. Ranchers are asking the PRNS to recognize their operations as Historical Ranching Operation, Food Production Zones, or Permanent Agricultural Zones. These terms better reflect the nature of the activities and importance of their economic contribution and environment protection to the County of Marin. I believe the National Seashore Superintendent should harmonize with USDA Mission, Vision, and Goals and acknowledge that ranching is ever changing, market driven, and must be sustainable.

Correlation between “Organic Act Mission” and NPS Farm History

On August 25, 1916, President Woodrow Wilson signed, interestingly enough the “Organic Act” creating the National Park Service, a new federal bureau in the Department of the Interior, with a “Mission” that “the Service thus established shall promote and regulate the use of Federal areas known as national parks, monuments and reservations... ***by such means and measures as conform to the fundamental purpose of the said parks....***” ***strives to meet those original goals***, while filling many other roles as well: guardian of our diverse cultural and recreational resources; environmental advocate; world leader in the parks and preservation community; and pioneer in the drive to protect America’s open space.

In our case, GMPA area of concern -- a fundamental purpose was to maintain Agricultural/Pastoral Region of the National Seashore, which historically was farmed long before National Park was establishment in 1962. The 1962 enabling legislation referred to “ranching and dairying purposes” of the PRNS. The 1978 Amendments broadened the terminology to “agriculture, ranching and dairying purposes”. Every effort to promote and protect this agricultural resource is directly connected and consistent with the Organic Act Mission.... ***by such means and measures as conform to the fundamental purpose of the said parks.... strives to meet those original goals*** of the PRNS.

Enacted in 1978, Public Law 95-625 provided standardized legislative language for the leasing of land for agricultural purposes within these NPS units (16 U.S.C. §§ 459c-5 and 16 §§ 460bb-2(j)). Following these mandates NPS managers have authorized ranching and dairying operations through agricultural lease/special use permits (lease/permits) issued to ranchers. The lease/permits include terms and conditions that ***ensure*** the protection of natural and cultural resources.

For nearly 40 years farmers have complied with Public Law 95-625 to ensuring the protection of natural and cultural resources have adhered to various mandates, regulations, policies including the following mandated range management activities and programs:

- ✓ Monitors various attributes, including vegetation, water quality, and ranch infrastructure.
- ✓ Works with ranchers to implement best management practices to protect sensitive resources, including water quality and rare and endangered species.
- ✓ Conducts residual dry matter monitoring each fall to assess the amount of plant material left at the end of the grazing season.
- ✓ Works with ranchers to monitor and manage invasive nonnative vegetation.
- ✓ Conducts permitting for individual management actions and improvements by ranch operators not covered under lease/permits, such as fence construction and water developments.

These stated program activities are higher standards than practiced throughout the farming region outside of the NPS boundaries. These exceptional standards cannot be compared to large dairy/livestock confinement operation found in other regions in the USA that do not have on site range management officials to determine compliance with NPS laws, regulations, policies and formal auditing of ranching procedures to determine compliance with lease agreements statutes. Plaintiffs in the lawsuit leading to this EIS/NOI process are misdirected -- clearly lacking knowledge between outstanding land stewardship by ranchers and the co-relation with the NPS in complying with the highest farming standards in the USA.

In addition, the NPS should recognize that all the NPS organic dairy/livestock/poultry operations meet the highest livestock and poultry standards adopted under the National Organic Program (NOP) enforced by The U.S. Department of Agriculture's (USDA) Agricultural Marketing Service (AMS). These standards when applicable should be considered in development of the GMPA. The NOP standards are transparent and enforceable as recently mandated.

On January 18, 2017, USDA announced a final rule that strengthens the integrity of the organic label by clarifying production requirements for organic livestock and poultry. The final rule establishes a level playing field for organic producers, bolsters consumer confidence in the organic label, and ensures that all organic animals live in pasture-based systems utilizing production practices that support their well-being and natural behavior. Given **all** our dairies in Marin County, including the six (6) in NPS, are certified organic under USDA our consumers and PRNS managers can be confident that the highest measures to protect animal health and welfare and natural resources protection are implemented.

In addition, the final rule supports the core goal of the Organic Foods Production Act (OFPA), which instructs USDA to develop regulations – including detailed standards for organic livestock and poultry production – to ensure that organic products meet a consistent standard. The NPS managers should evaluate these standards and adopt them as Best Management Practices (BMP's) as strategies to preserve park resources and effective animal health standards. These standards fully vetted by the National Organic Standards Board (NOSB) are ready for adoption by the NPS to further enhance the Leases/Special Use Permits standards identified in the 1978 Public Law 95-625.

PRNS could explain in their NOI/EIS findings that all Dairies in the PRNS are compliant with USDA NOP organic farming standards highlighting the following major provision of the rule which:

- ✓ Clarifies how producers and handlers must treat livestock and poultry to ensure their health and well-being throughout life, including transport and slaughter.
- ✓ Specifies which physical alterations are allowed and prohibited in organic livestock and poultry production.
- ✓ Establishes minimum indoor and outdoor space requirements for poultry.

These rules can be viewed at www.regulations.gov or on the AMS website.

Issuance of Lease/Permits for 20 years

Some actions to further the support for agriculture should include developing long term lease documents (20 years) as directed in the November 29, 2012, memorandum for then Secretary Salazar. ***The Secretary of the Interior directed the NPS to pursue the issuance of lease/permits for terms up to 20 years.***

This GMPA should fully evaluate the concept of a 20 year “rolling renewal” agreement. In this type of agreement, at the end of each year the lease is automatically renewed for the length of the initial 20 year term, unless either the landowner or the farmer decides that the current term will be last term. In this way, the parties can continuously capture the benefits of a long term lease. The benefits include:

- ✓ More commitment by the rancher to invest in infrastructure and repairs
- ✓ Improved public enjoyment of the seashore
- ✓ More likely that banks will offer loans to the rancher
- ✓ More likely that ranchers will invest in long term rangeland improvements
- ✓ More likely that ranchers will invest in resource conservation projects
- ✓ More rancher eligibility for resource conservation project grants
- ✓ Reduced NPS staff time and paperwork
- ✓ Creation of more public trust
- ✓ Ranch intergenerational/ succession planning

This appears to be a perfect place and opportunity to utilize a rolling renewal agreement because the park has respected the relationship of the families with the land as part of the cultural landscape, and the leases/permits have been successfully adopted for nearly 40 years. Given the successful history of compliance with park mandates ranchers have demonstrated they are capable and willing to protect park resources while fulfilling the local and regional demand for food, livestock and dairy products.

Ranching is a commitment that requires day-in and day-out activity, year after year. Marin family farmers are trying to stay competitive, but shifts in farm production costs and the loss of farming neighbors can have a cascading affect. Family farms rely on neighbors so they may together generate a collective economy of scale to yield economic benefits, as well as provide a buffer against hard times. Allowing long term rolling 20 year leases are necessary to maintain long term farming operations, commitments from farm supply business, lenders, and other community support organizations.

Additionally, a need exists for consistent policies and procedures covering:

- ✓ capital improvements
- ✓ roads, fencing
- ✓ farm labor housing
- ✓ vegetative management
- ✓ water improvement projects

Ranchers and dairies should be given equal protection and treatment, allowed to adopt similar activities, (including those activities practiced outside the NPS) and use the best available science and management practices. An example is the ability to produce silage for livestock feed, brush and weed control, fencing repairs, and selective least toxic herbicide use to control invasive species, etc. The finished General Management Plan Amendment and resulting policies should be vetted with the Point Reyes Seashore Ranchers Association who should be allowed to be a partner in the discussion on implementation. The Ranchers Association should be the venue Park Superintendent uses to announce, discuss, and direct how the GMPA will be utilized once certified by the Department of Interior - NPS. Collectively ranchers need to understand what the Park can do that may be beneficial so they can individually and/or collectively make sound decisions. These activities should be shared with "all" ranches and freely discussed. Applying "Best Ranching Practices" should be celebrated and recognized; learning from each other should be a primary goal.

Federal, State, and Local Agency Resources

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

Ranchers identify the need for USDA assistance through an Environmental Quality Incentive Program (EQIP) project or conservation support programs. These activities have been evaluated within the agency of origin and comply with existing National Environmental Standards. The NPS should embrace and implement valuable projects without requiring a separate National Environmental Policy Act (NEPA) or other lengthy review before a project can be undertaken. The National Seashore General Management Plan Amendment should harmonize with other Federal and State agencies that have complied with legal procedures and allow for their utilization without further scrutiny. Many USDA projects are granted on an annual basis and delays in administrative approval eliminate the Seashore rancher to access while other ranchers in the region enjoy support and financial assistance. Between the PRNS, RCD, USDA, and other noted agencies a very successful and collaborative approach could be reached benefitting everyone. Ranchers in the Park want to be recognized as "Class A" and have access to all available resources.

Tule Elk Impacts on Ranching and Agency Compliance

There are now two independent free-ranging herds, one near Drakes Beach and one near Limantour that extends onto ranch lands in the Estero Road area.

Tule Elk are impacting ranchers (Drakes Beach Herd – 110 estimated total animals – 70+ in 2014), an increase of 40 Elk. The main herd (consisting of females, juveniles, and a few males), and male bachelor groups, spend time on A Ranch, B Ranch, C Ranch, E Ranch, the former D Ranch, because they have migrated beyond the fenced wilderness boundary area onto ranch land, they compete for feed and water resources intended for livestock, disrupting operations, and increasing operating cost while potentially exposing the livestock to disease pathogens (John's).

The migration of Tule elk onto pastoral lands is equivalent to supplemental feeding artificially increases the size and density of the elk herd, and this practice may contribute to the spread of disease among the elk and livestock including erosion of their habitat. The NPS must consider various goals for managing elk: (1) conserving their habitat in designated "Wilderness" areas, (2) making the population sustainable, and (3) managing the risk of disease. The NPS "wilderness" areas are prescribed as a boundary to allow elk to freely roam and to flourish. It is not truly a "wilderness" in a natural geographical resources context. As such these areas must have a well-designed integrated management plan to properly sustain the herd size and health within the designated "wilderness" areas. The most notable practices include brush management, enhancing grassland production, and water supplies. Creating a healthy habitat in NPS "wilderness" is superior to regularly hazing elk seeking supplemental feed on pastoral land.

The Historic "C" Ranch (Spaletta Dairy) is the most impacted ranch sustaining the constant "Elk" feeding pressure on their dairy pasture (2 Elk = 1 Cow) and causing fence damage and consuming water intended for their cows. Pasture loss must be replaced with feed purchased and trucked into the dairy significantly increase production cost. Elk interfere with normal cow management such as herding and they disrupt milking times/schedules. The Elk pasture consumption also places ranchers into the risk of not meeting NPS residual dry matter standards. Not meeting the requirements may subject the rancher to reduce animal stocking rates to meet NPS animal to available feed ratios. In addition, reduced pasture access to cows affects the ability to retain organic certification -- if cows do not have access to open pasture as mandated under NOP standards dairies may lose certification.

Efforts to disperse Elk by NPS specialists come with a great level of labor and equipment use and have proven to be ineffective. Ranchers are left with the grinding pressures and must deal with "Elk" disrupting routine dairy activities increasing expenses otherwise spent on normal ranch activities.

Wilderness designated lands and Pastoral/Ranch leased lands should be given equal protection corresponding to their intended use and purpose. Wilderness Areas are intended for displaying nature and "Resources Specialist" to manage whereas the Pastoral Areas are intended to be managed for agricultural use by the "rancher". There should be little allowance for commingling resources use and management styles between them. When livestock are found in Wilderness, they are removed. Likewise, when Elk are found in Pastoral Zones they too should be removed: not really that complicated to manage. A well designed plan to correct the imbalance of Elk in the Pastoral areas should be clearly defined in the GMPA to move Elk back to "Wilderness Zone" is a priority of ranchers.

There are many opportunities and success stories waiting to be told by this and future generations of ranchers if Park Officials embrace, partner, assist, and recognized the value that ranchers bring to the Point Reyes National Seashore Working Landscape and to the Mission of the National Park Service.

Respectively,

A handwritten signature in black ink that reads "Stacy Carlsen". The signature is written in a cursive, flowing style.

Stacy K. Carlsen
Marin County Agricultural Commissioner
Director of Weights and Measures

November 7, 2017

Point Reyes National Seashore
Cynthia MacLeod Acting Superintendent
1 Bear Valley Road
Point Reyes Station, California 94956

RECEIVED
2017 NOV 13 AM 10:06
POINT REYES NS

Dear Cynthia MacLeod,

I would like to make a few comments on the National Park Service's (NPS) General Management Plan Amendment (GMP Amendment) for Point Reyes National Seashore.

In your letter to interested parties, you point out that: "These lands host diverse natural and cultural resources, million of visitors, layers of human history, and ongoing active agricultural." All of your points are very true and, in combination, are the very reason the park has so many satisfied visitors every year.

Although you make the point that the Park lands include "layers of human history and ongoing active agriculture," you are, in certain alternatives, considering the elimination of active dairy and beef cattle ranches which, in essence, terminates the continuance of the "layers of human history." These dairy ranches were established and developed by "diverse" individuals of many cultures (Irish, Italian, Portuguese, etc.) who undertook nothing less than the entrepreneurial spirit of years of hard work in clearing the land and establishing their ranches. These working ranches not only provided economic profits to Marin and the local communities but continue to this day to provide such resources. In addition, these working ranchers not only provide substantial employment for the local communities and economic value to the businesses but also provide the farm workers with essential housing which helps to reduce the housing crisis in the communities surrounding the Park.

I believe it would be unconscionable and irresponsible to terminate and eliminate the dairy and cattle ranches which would, in essences, bring substantial economic suffering to, not only the local communities, but to the farm workers and their families, not to mention the loss of their housing. I believe NPS should provide all ranch families with 20 year leases with a provision that provides that these leases may be extended until a ranch family declines to extend such lease.



The other area of concern is with the Tule Elk situation. After the Tule Elk herd was reestablished in Point Reyes in 1978, nearly half the herd had died between December 2012 and December 2014 from drought and related starvation and thirst. The two free roaming Elk herds (Drakes Beach and the one near Limantour) trample the ranchers fences, feed on drought-limited forage and drink precious water meant for the milk cows. When NPS traps and contain animals and not have them get feed and water, it's unconscionable if not criminal. I believe that the NPS has mismanaged the Tule Elks over these many years and that the NPS may be incapable of providing proper management of the Tule Elks if another natural disaster should occur.

I recommend that the NPS should, at least, eliminate the free ranging Tule El herds from Drakes Beach and the one near Limantour that extends onto the ranch lands in the Estero Road area. This would reduce costs and expenses of the ranches and would also reduce cost and expense of NPS which would certainly please the current Administration.

If NPS continues their stewardship of the Tule Elk herd located on the fenced wilderness reserve on Tomales Point, I would certainly hope NPS would provide such caregiving to ensure the safety and well being of the herd.

I further believe that the personal experience that visitors now enjoy will continue without any additional activities provided by NPS. The visitors now enjoy the inspiration of the natural beauty and character of the area along with the inspiration of the continuance of human history by visual observation of the working ranches.

Sincerely,


Eugene C. Zlatunich


RUTH KASLE GRAHAM

November 5, 2017

Point Reyes GMP Amendment Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Ladies/Gentlemen:

I am writing to express my support for the family ranches that currently operate within the Point Reyes National Seashore. I support the alternative of Continued Ranching and Management of the Drakes Beach Tule Elk Herd, the NPS' Initial Proposal. The family ranches that operate at Point Reyes manage their land well. They are also an important supplier to the Northern California market for natural and organic products. What they do is compatible with the preservation of Point Reyes as a natural area.

I hope you will do the right thing and allow these ranches to continue their leases. Please don't be sucked in by the loud voices of a minority who don't see the value these ranchers provide.

Thank you.

Sincerely,



RECEIVED
2017 NOV - 8 PM 6: 18
POINT REYES NS

Dear Cynthia MacLeod,

11/03/2017

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In your letter to interested parties, you point out that: "These lands host diverse natural and cultural resources, million of visitors, layers of human history, and ongoing active agricultural." All of your points are true and, in combination, are the very reason the park has so many satisfied visitors every year.

Although you make the point that the Park lands include "layers of human history and ongoing active agriculture," you are, in certain alternatives, considering the elimination of active dairy and beef cattle ranches which, in essence, terminates the continuance of the "layers of human history." These dairy ranches were established and developed by "diverse" individuals of many cultures (Irish, Italian, Portuguese, etc.) who undertook nothing less than the entrepreneurial spirit of years of hard work in clearing the land and establishing their ranches. These working ranches not only provided economic profits to Marin and the local communities but continue to this day to provide such resources. In addition, these working ranchers not only provide substantial employment for the local communities and economic value to the businesses but also provide the farm workers with essential housing which helps to reduce the housing crisis in the communities surrounding the Park.

I believe it would be unconscionable and irresponsible to terminate and eliminate the dairy and cattle ranches which would, in essences, bring substantial economic suffering to, not only the local communities, but to the farm workers and their families, not to mention the loss of their housing. We believe NPS should provide all ranches with 20 year leases with a provision that provides that these leases may be extended until the lessor declines to extend such lease.

The other area of concern is with the Tule Elk situation. After the Tule Elk herd was reestablished in Point Reyes in 1978, nearly half the herd had died between December 2012 and December 2014 from drought and related starvation and thirst. The two free roaming Elk herds (Drakes Beach and the one near Limantour) trample the ranchers fences, feed on drought-limited forage and drink precious water meant for the milk cows. When NPS traps and contain animals and not have them get feed and water is unconscionable if not criminal. I believe that the NPS has mismanaged the Tule Elks over these many years and that the NPS may be incapable of providing proper management of the Tule Elks if another natural disaster should occur.

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I further believe that the personal experience that visitors now enjoy will continue without any additional activities provided NPS. The visitors now enjoy the inspiration of the natural beauty and character of the area along with the inspiration of the continuance of human history by visually observation of the working ranches.

Sincerely,


JoAnn Zlatunich


RECEIVED
2017 NOV - 8 PM 6:45
POINT REYES NS

**Nicasio Land Owners Association
Nicasio Land Preserve
Box 532, Nicasio, CA 94946**

RECEIVED

2017 NOV 15 AM 10:31

POINT REYES NS

November 13, 2017

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956
<https://parkplanning.nps.gov/POREGMPA>

Re: **Point Reyes National Seashore Comments re: General Plan
Amendment**

To whom it may concern:

We understand that the National Park Service is in the planning process for a General Management Plan Amendment (GMP Amendment) for Point Reyes National Seashore ("PRNS"). The GMP Amendment is intended to guide how the more than 27,000 acres currently leased for ranching at PRNS will be managed once the current five-year leases, recently adopted as an interim measure, expire in 2022. The Nicasio Land Owners Association (NLOA) and the Nicasio Land Preserve (NLP) welcome this opportunity to comment on the GMP Amendment process.

Summary of the NLOA/NLP Position

The NLOA and NLP have analyzed the six alternative approaches set forth in the Park Service publication summarizing the GMP Amendment process. We support the Park Service's Alternative 5, which retains the existing 27,000 acres of ranches on the Point Reyes peninsula, while managing the tule elk in a manner consistent with the existing ranching. We acknowledge that issues related to balancing the interests of ranchers and tule elk, and whether the PRNS lands should be allowed to return to the native condition they were in before the 1800's, are complex and controversial, and they stir strong emotions and opinions.

For the reasons detailed below, the NLOA and NLP believe that a decision to severely restrict PRNS ranching ultimately would negatively and significantly impact agriculture in West Marin, including Nicasio. The PRNS ranches are an integral part of a Marin/Sonoma agricultural

community that is nationally renowned for quality, sustainability, and product innovation. Reducing PRNS ranching will threaten the viability of other farms and ranches, as well as those marketing, distribution and supply enterprises that provide critical support to existing farming and ranching activities. Furthermore, PRNS was created with the direct support of the ranching families that occupied the land, based in part on their understanding that they would be permitted to continue their ranching activities consistent with their stewardship obligations. The NLOA and NLP respect that contribution and support an approach that will preserve both that partnership and at least one of the tule elk herds that presently grazes on the peninsula.

The NLOA/NLP Analysis and Position

The NLOA and NLP support continued cattle and dairy ranching, along with existing small-scale farming, on the Point Reyes peninsula, consistent with both reasonable environmental regulation and management of the tule elk herds in a manner that does not interfere with responsible and economically viable ranching operations. As explained in more detail below, we believe the success and sustainability of agriculture-based enterprises in Nicasio and elsewhere in Marin are dependent in significant part on the success of beef and dairy cattle ranching at PRNS. Such ranching has been ongoing in the PRNS area since the mid-1800's, and it is a key part of Marin's agricultural history and economy. However, we are not advocating for the expansion of existing farming/ranching activities (to permit, e.g., large vineyards, feedlots, etc.) at PRNS.

At the present time, the PRNS ranches contribute significantly to the overall strength, vibrancy, and economic success of Marin agriculture. If the Park Service were to decide to phase out ranching within PRNS boundaries, or to only grant a few of the existing families five-year leases (which would not permit any long-term planning on the ranchers' part), we believe that in time the overall scale of ranching and agriculture in West Marin and Sonoma Counties would diminish. This is because the benefits and economies derived from the existing scale of Marin/Sonoma ranching and agriculture (e.g., marketing, distribution, diversity and quality of products, food processing, excellent national reputation, etc.) would likely be materially reduced were the 27,000 acres of PRNS ranch lands withdrawn from agricultural use. This diminution would not be seen overnight, but within the next several years we would expect ranching and agriculture operations, and the infrastructure that currently supports them, to recede.

Nicasio is not isolated from existing development pressures in eastern Marin County. To the extent the overall scale of agriculture decreases in Marin/Sonoma, existing agricultural enterprises in Nicasio and adjoining West Marin communities are likely to also become economically challenged, in turn leading to increasing pressure to develop property presently devoted to agriculture. In short, supporting existing agricultural uses of PRNS land, in an

environmentally sensitive manner that also makes economic sense for ranchers, is in the best interests not only of PRNS but also of Nicasio, Marin County, and many other constituencies.

Another very important factor in our consideration of the GMP Amendment process is the historic role played in the formation of PRNS by the ranching families that occupied (and continue to occupy) agricultural lands in what is now PRNS. PRNS could not have been created without the cooperation of the ranchers, whose historic operations helped preserve the rural, unspoiled character of this unique peninsula. Obviously other groups advocated for the formation of PRNS (dedicated activists, environmentalists, astute politicians, and agricultural visionaries) and helped prevent Point Reyes from becoming another Malibu. That said, we believe that the present-day manager, the Park Service, has a moral obligation to the ranchers and to ranching to ensure that agriculture continues as an integral component of PRNS and that ranches should be included in the Park's future in perpetuity.

Even today, it is the cattle grazing on the Peninsula that has kept the coyote brush in check and the vistas open, and reduced fire hazard. Ending ranching in PRNS - returning it to its so-called "natural state" -- would in a matter of a few years lead to fields, previously devoted to cattle grazing, becoming overgrown. Over time, this process will reduce and ultimately eliminate the dramatic open feeling that currently helps make PRNS such a memorable area.

We understand and agree that preserving tule elk at PRNS is an important concern. Although we believe that ensuring the future of beef and dairy ranches and attendant small-scale farming at PRNS is a key priority, responsible and humane management of the tule elk herds by the Park Service would permit elk to graze while economically viable ranching continues.

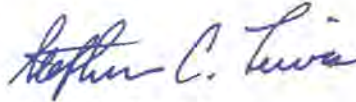
The NLOA/NLP Recommendation

After considering the various alternatives, including the proliferation of tule elk and their effect on Point Reyes ranching, the NLOA and NLP recommend as follows:

1. On balance, we favor Alternative 5 (Continued Ranching and Removal of the Drakes Beach Tule Elk Herd) taking effect in 2022. This would allow the existing ranch families to continue beef cattle and dairy ranching operations on about 27,000 acres under agricultural leases/permits with 20-year terms. The Drakes Beach tule elk herd would be humanely removed using methods developed as part of the GMP Amendment planning process, but the Limantour-Estero Road herd would remain where it is and be managed to mitigate any negative effect they might have on ranching activities.

2. However, if the Park Service demonstrates during the upcoming five-year interim lease period that it can effectively manage the existing tule elk herds (much more effectively than it has done so to date), then we would be willing to support Alternative 4 (Continued Ranching and Management of the Drakes Beach Tule Elk Herd (NPS Initial Proposal)). Under Alternative 4, existing ranch families would be permitted to continue beef cattle and dairy ranching (and presumably existing small-scale sustainable farming) on about 27,000 acres currently under agricultural leases/permits with 20-year terms, but the Drakes Beach and Limantour-Estero Road tule elk herds would be humanely managed so as to not negatively affect the environment or the economics of successful cattle ranching in the planning area to which the GMP Amendment applies.

Thank you for favorably considering our comments on this matter.



Stephen C. Lewis
President
Nicasio Land Owners Association
Nicasio Land Preserve
NicasioLandOwnersAssociation@gmail.com

cc: Supervisor Dennis Rodoni (via email)

11/12/17

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

RECEIVED
2017 NOV 15 AM 10:32
POINT REYES NS

Superintendent MacLeod,

There needs to be an additional alternative in this process.

The range of alternatives favors the elk over ranching. Three alternatives call to end or reduce ranching and five alternatives suggest elk remain on the ranches. Not one alternative removes the elk from the ranching areas and not one alternative make cultural resources conservation and historic ranching a priority.

When Point Reyes National Seashore was signed into legislation in 1962 the intent was to preserve this working landscape.

If elk were to remain on the ranches the elk would destroy this working landscape. They will multiple and therefore consume more grass each year and soon there will be no room left for cattle thus eliminating the ranches.

We ask for an additional alternative to include:

- Continued dairy and beef ranching with 20 year renewable leases
- Elk permanently moved back into the wilderness and managed there
- Improved signage educating public about the working landscape
- Implement best land management practices

For those who would like to see continued ranching at Point Reyes National Seashore, we thank you for giving this alternative consideration.

Sincerely,


Gino and Kathy Lucchesi
Home and N Ranch in Point Reyes National Seashore

Superintendent
Pt. Reyes GMP Amendment

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2017 NOV 14 PM 12: 40

POINT REYES NS

Dear Superintendent,

I am writing to urge the Park to support the ranchers in the historic pastoral zone with 20 year leases to ensure their continued stewardship of the land. I do so for a number of reasons, the first being that the families of these ranches gave up their private ownership with the agreement they would be able to continue ranching. We owe it to them to not back out of this agreement. I also feel that they are the best caretakers of land they and their families have known for over 100 years.

Equally important is the agricultural landscape those ranches protect. As a farmer for a mere 22 years, I know that ranches and ranchers in full view of the public serve another function, that of educators to a public that may even think milk in cartons comes from machines in the back of the supermarket. In a time when children only see cows as cartoon figures on screens, and when obesity because of poor diets is increasing at a monumental rate, ag education is more and more critical nationally. These farms, most of which are certified organic, are the picture perfect opportunity for an education campaign, across the nation, to talk about the importance of healthy, fresh food. Here on my farm, we have almost 50 field trips from local Bay Area schools. For many children, it is the first time they have ever seen a real cow, goat, or sheep, and they learn about the contribution these animals make to our diets.

I think that the Park has an opportunity to promote healthy agriculture to a public becoming more and more ignorant of farming, its complexity, and farmers' careful attention to the health of their land, besides its feeding our nation. I would love to see a living history museum of agriculture with a **curriculum that included ranch visits and ranch stays**. Besides generating **additional income** for the ranchers and the Park, such an education program could become a model for the nation.

I am in wholehearted support of the Pt. Reyes ranches, think the tule elk should be culled and removed from the pastoral zone, and urge the 20 year leases to aid in maintaining an economically viable ranching community.

Thank you 


Mimi Luebbermann


Point Reyes National Seashore
General Management Plan Amendment

November 14, 2017

Thank for this opportunity to comment on the Point Reyes National Seashore General *PLAN* Amendment.

The following comments are in support of Alternative 5, Continued Ranching and Removal of the Drake's Beach Tule Elk Herd.

The adoption of the presentation on page 8 of The General Management Plan Overview", titled "Ranching Background" includes the November 29, 2012 Memorandum of Understanding of the Secretary of Interior that directed the NPS pursue the issuance of Lease/permits for up to 20 years.

The implementation of this directive resolves the issue of allowing continuing ranching with leases long enough to enable our valuable agriculturalists to continue to make their contributions to a continuation of these terribly important issues of resource conservation, biodiversity and history.

In support of the removal of the Drake's Beach Elk Herd, their numbers when combined with the estimated totals for both herds, 110 for the DBEH and 130 for the Limantour-Estero Herd, come very close to the 1999 Interim Management Plan limit of 250 to 350 Elk. The expansion of the LEEH into neighboring ranch land was not anticipated by the Seashore at that stage of planning. New totals for both herds are due very soon.

The removal fo the DBEH would simply relocate those elk to larger, more suitable habitat at one or more of the existing 25 reserves.

In conclusion, the introduction to Laura Alice Watt's excellent book, "The Paradox of Preservation" includes a quote from Aldo Leopold, " conservation means harmony between men and the land"

Respectfully submitted,
Beverly Childs McIntosh, retired public agency environmental planner/biologist


Beverly Childs McIntosh

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2017 NOV 15 AM 6:50
POINT REYES NS



RECEIVED

2017 NOV 14 AM 11:20

POINT REYES NS

November 13, 2017

Cynthia MacLeod
Acting Superintendent
Point Reyes GMP Amendment
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Subject: Point Reyes National Seashore General Management Plan Amendment First Phase Comments

Superintendent MacLeod,

Thank you for this opportunity to provide comment during the first phase of the Point Reyes National Seashore and Golden Gate National Recreation Area north district (PRNS/GGNRA) General Management Plan Amendment (GMP Amendment) planning process. The Agricultural Institute of Marin (AIM) is in its 34th year as a leader in the San Francisco Bay Area Food System. We manage seven farmer's markets around the bay, including the long running Marin Civic Center Market in San Rafael on Thursdays and Sundays. Our organizational goals are:

- To support Regional Sustainable Producers by Providing them with Direct Access to Consumers; and
- To Educate the Public about the Nutritional and Economic Benefits of Buying Locally Grown Food Directly from Farmers.

Because of the connection of our goals with the farming and ranching on PRNS/GGNRA and contributions it makes to the Marin and Regional community, AIM expresses its fullest support for the continuation of these local farm family operations on the National Park service. Our vision of the regional community and food system does not see the border around PRNS/GGNRA as a boundary, demarking different land use and ownership. We see it as a connection with a national agency partner, in this case the National Park Service, making it possible to achieve a strong local community and food system that serves as an example for others to replicate around the country and beyond.

We are proud to host many of the PRNS/GGNRA farmers and ranchers as participating vendors at our farmer's markets. Their local farm products represent everything AIM is striving for – quality local food made available through strong personal farmer and customer relationships.

At this step of the GMP Amendment process, we ask that our specific goals be used as criteria for alternative analysis. The National Park Service's (NPS) goals and objectives in this process to facilitate the viability of PRNS/GGNRA producers through 20-year leases and to enhance the visitor's experience are in direct alignment with our goals. Developing and analyzing alternatives to achieve these will position NPS as a leader and partner in the complex provisioning of multiple benefits through working ranches and farms.

Respectfully,

Brigitte Moran
Chief Executive Officer

Point Reyes GMP Amendment
Superintendent
1 Bear Valley Road
Point Reyes Station, CA 94956

RECEIVED

2017 NOV 14 PM 12:00

POINT REYES NS

Before including your address, telephone number, electronic mail address, or other personally identifying information in your comments, you should be aware that your entire comment (including your personally identifying information) may be made publicly available at any time. While you can ask us to withhold your personally identifying information from public review we cannot guarantee that we will be able to do so.

Comment Form

Park: Point Reyes National Seashore
Project: Point Reyes National Seashore and North District Golden Gate National (ID: 74313)
Recreation Area General Management Plan Amendment and Environmental
Impact Statement
Document: 2017-10 General Management Plan Amendment Newsletter (ID: 83408)

* indicates required fields

City: San Rafael

State/Province: California

Postal Code: 94903

First Name: Kate

Middle Initial:

Last Name: Powers

Organization: Marin Conservation League

Member Official Representative

Address 1: 175 N. Redwood Drive, Suite 135

Address 2:

Country: United States

E-mail: president@marinconservationleague.org

Comments or Requests: Refer to accompanying letter and attachment for Marin Conservation League's comments during the First Phase of the General Management Plan Amendment for the Point Reyes National Seashore and Golden Gate National Recreation Area and Marin Conservation League's Agriculture Policy Statement.



November 13, 2017

Cynthia MacLeod
Acting Superintendent
Point Reyes GMP Amendment
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Subject: First Phase Comments for the Point Reyes National Seashore General Management Plan Amendment

Dear Acting Superintendent MacLeod,

Introduction

Thank you for this opportunity to provide comments during the first phase of the Point Reyes National Seashore and Golden Gate National Recreation Area north district (PRNS/GGNRA) General Management Plan Amendment (GMP Amendment) planning process. The Marin Conservation League's mission since 1934 is to preserve, protect, and enhance Marin's natural assets. In 2015, MCL approved its Agricultural Policy Statement (attached) which includes the following stated goal:

“To continue to support the role Marin's agricultural community plays in maintaining open space, protecting wildlife corridors, managing carbon, preserving a valuable local heritage, and contributing to food security and the local economy.”

In accordance with our goal, and consistent with MCL's previous positions and actions regarding agriculture and our mission to conserve Marin's national park assets, we are in full support of the continuation of ranching and dairy production on the PRNS and GGNRA. We hold that there is a direct and mutually supportive connection between the GMP amendment and our agricultural policy and seek to partner with the National Park Service and the farm families on the Seashore to realize this connection. We further hold the GMP Amendment as a timely opportunity for NPS, working with the ranchers who have managed the land for generations and Marin partners, to lead the nation again by providing a solution that achieves the multiple objectives society holds for safeguarding the unique natural resources as well as the working landscape within the Seashore.

Specific Comments

We offer the following specific comments as initial considerations and recommendations for issue identification and the refinement and analysis of alternatives during the GMP Amendment planning

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San Rafael, CA 94903-1977

process and environmental review under the National Environmental Policy Act (NEPA). MCL will continue to participate in the GMP Amendment planning and review processes during coming years.

Land Allocation

Ranching and dairy farming should continue in the pastoral area on the greatest acreage possible as originally authorized. This will provide the best opportunity for each ranch to remain viable, assure the continued contribution of agricultural production on the Seashore to the local community and economy, and meet the larger goal of preserving this cultural and historic resource in the park. Additionally, any conversion of land from agricultural management by a farm family to alternative land uses would increase the management demands upon NPS staff which, in the face of a proposed 13% budget cut, would be difficult to provide.

Each of the three settlement-required alternatives represents real risks and compromises to these objectives. The six PRNS dairies represent 20% of the total number of dairies in Marin County and they ship to local processors such as Clover Sonoma and Straus Family Creamery. Removing them as proposed in the “No Dairy Ranching” alternative would eliminate an irreplaceable source of milk for the Marin-Sonoma milk shed, and would compromise this cultural use and landscape in both counties. The “No Ranching” alternative, in itself, acknowledges the ecosystem management role played by grazing livestock, with the point “...NPS may coordinate prescriptive grazing in high priority areas to maintain native and rare plant communities.” The proposed removal of 7,500 acres in the “Reduced Ranching” alternative would result in at least ten existing ranches being eliminated. The Environmental Impact Statement (EIS) should thoroughly analyze how the maximum allocation of land to grazing livestock and dairy farming provides needed on-the-ground resource management that might otherwise be beyond the capacity of NPS; how it maintains the contributions made to the strength of regional and local economy; and how it successfully achieves the cultural and natural resource preservation and management objectives of the NPS for PRNS and GGNRA.

The concept of buffers is, on its face, one that MCL supports. Buffers should be situated strategically to protect sensitive resources, but in ways that do not overly impact any single ranch. Additionally, significant consideration should be given to buffers that have already been put in place and not formally named. Management requirements of these buffers should be addressed, including the avoidance of undesirable invasive plant species and the unintended consequence of disrupting plant community structures and harming sensitive species that depend on a grazing regime for survival.

Leases

Lease length is directly related to the strength and viability of farming and ranching operations. Long leases promote long-term viability of ranching operations by providing the ability to reliably forecast economic costs and returns. This includes investments in infrastructure upkeep, natural resource management, maintenance of healthy water and air quality, and assurances of farm employees’ welfare. The proposed 20-year leases are a good first step to create this environment for success. Longer leases would contribute even greater confidence and stability. When structur-

ing leases, NPS should give consideration to these points, and also describe methods for how the proposed 20-year leases could serve a longer time period (e.g., perhaps through 5-year incremental extensions). For example, when a lease runs for five years, the lease should be extended for another 20 years so that the ranchers will have the “long term equity” to support their infrastructure up-keep, resource management, farm work force and necessary viable financing opportunities.

Elk

Significant conflicts exist between some of the free-ranging tule elk and some of the ranches at PRNS. We recognize that long-term management solutions to these conflicts, as well as other issues associated with the elk herds (e.g., Johne’s disease), must be found. The elk and agricultural operations are both valuable resources at PRNS, and a management solution that would provide a level of co-existence acceptable to the affected ranches would be ideal. MCL recognizes that this ideal may be difficult and/or costly to achieve. The six alternatives presented to the public to date have options for addressing the issue that essentially range from “management” in one form or another to “removal” of one or more of the free-range elk herds.

NPS has indicated that it intends to analyze this issue carefully with qualified resource management professionals. MCL supports NPS in this approach. We look forward to seeing the results of this analysis and will comment on a preferred management approach once those results are available, hopefully in the Draft EIS.

Park Resources and Visitor Carrying Capacity

Much can be done to improve the PRNS/GGNRA visitor experience. Fundamental to this is an analysis of the annual, seasonal, peak-day, and even daily visitor volume that can be effectively supported by PRNS staffing and infrastructure resources. MCL views this GMP Amendment and EIS as an opportunity to explore and implement a variety of tools for visitor access and participation. Specifically, the EIS should examine visitor shuttle models that relieve congestion and parking constraints. This would contribute to a stronger visitor experience with PRNS/GGNRA by getting visitors out of their automobiles. This could also serve to mitigate environmental impacts by reducing vehicle traffic, idling time (emissions) resulting from congestion, etc. Examples and models are in operation throughout the NPS that achieve these objectives, so this is an important topic to evaluate in the EIS.

Similarly, a visitor’s experience and participation at PRNS inevitably crosses the boundary between portions of PRNS inside and outside the GMP Amendment planning area. This is also the case for the conflict posed by the free-ranging elk. MCL recommends that the alternatives identify and consider integrated resource management solutions that also apply to regions outside the proposed planning area. These solutions would be more holistic and comprehensive, and would recognize the inherent visitor and resource connections and relationships that exist across the proposed planning area boundary.

Visitor Access and Experience

Coupled with our suggestions for Park Resources and Visitor Carrying Capacity, MCL supports

enhancing visitor experience through the GMP Amendment. One specific option MCL recommends that the NPS explore is the growth of the trail network in the planning area. This could be implemented along the boundaries between ranch operations, and could include relevant cultural, historical, and natural interpretive information (e.g., brochures, audio tours, signage). Visitor experience would be expanded by providing access to selected portions of the pastoral area, and be made richer by the opportunity to learn about PRNS agriculture, its history, and the names and faces of the ranching community that continues the traditional historic “family farms” of the past — a tradition across the nation that is increasingly threatened by much larger “industrial agriculture” operations.

Another potential way to enhance visitor experience with respect to the ranching operations would be to consider some form of “ranching and farming tours” that would be available to the public. This could foster a better understanding of how ranching compatibly contributes to PRNS, NPS’s mission for managing PRNS, the regional economy, and how the operations are managed to protect the natural environment of PRNS. MCL recommends that this be explored and analyzed in the GMP Amendment and EIS.

Cultural and Historic Resources

The PRNS/GGNRA are unique among national park units in that they have successfully implemented the integration of a pastoral landscape and its active ranching traditions with large areas of natural landscape and wilderness. The cultural and historic resource that has been preserved in PRNS/GGNRA is the combination of the historic pastoral landscape and the multi-generational farm families that are managing them. These local community members are the most direct link and now, four and five generations later, are the legacy of the historic period of ranching and farming on the Point Reyes Peninsula which dates back to the mid 1800s. The working landscapes they manage exemplify and manifest the national movement to strengthen local food systems and community agriculture. They are leaders in grass-fed and organic production. At the same time, they have contributed to maintaining the ecological richness that is the hallmark of PRNS/GGNRA and must comply with stringent state and federal environmental regulations. MCL recommends that the NPS, through the GMP Amendment and EIS process, recognizes this connection to historic agricultural operations, and describes the innovations in agricultural and resource management practices that are unique to the PRNS/GGNRA. These historic agricultural operations represent a tremendous resource and exceptional educational opportunity to the public. The environmental, cultural, educational, and economic benefits they bring to PRNS/GGNRA support NPS’s mission for this area, and should be fully addressed and documented in the EIS.

Community and Agricultural Economy

Agriculture on the PRNS/GGNRA represents about 19% of the areal extent and 19% of total production in Marin County. Per the 2016 Marin County Crop Report, total gross production value was \$96.5 M. Accordingly, the contribution of PRNS/GGNRA agricultural production to total county production is \$18.3M. This does not include multiplier effects through processing and value-added production, which can be 3 to 4 times that amount, resulting in a value of about \$73.2M.

In terms of employment, every on-farm job is matched by 3 to 4 jobs in other off-farm related agricultural businesses. In 2012, Marin County employed 1,072 farm employees (USDA 2012 Ag. Census) resulting in as much as 4,288 off-farm jobs. PRNS/GGNRA's contribution to on-farm employment is 204 employees and a corresponding 815 off-farm employees. The loss of \$73.2 M in annual production, and as many as 1,019 jobs, would be devastating to the agricultural community and the region as a whole. MCL asks that, in analyzing alternatives for the GMP Amendment, full consideration be given to the impacts each proposed alternative would have to this significant contribution to the local and regional economy. Proactively, we recommend that these benefits be referenced, as appropriate, in NPS's "purpose and need" statement for the GMP Amendment.

Sustainable Agriculture and Regulatory Compliance

The ranchers on PRNS/GGNRA rangelands and dairies are dedicated to achieving the synergy of working landscapes and environmental resource stewardship. To that end, they must comply with some of the most stringent and all-encompassing water quality management regulations for agricultural nonpoint source pollution in the United States. Two specific examples of federal and state environmental regulations are the respective Grazing Lands and Dairy Conditional Waivers for Waste Discharge Requirements approved and implemented by the San Francisco Regional Water Quality Control Board. In both cases, the agricultural manager must evaluate potential impacts to surface and groundwater from grazing livestock and manure management, and implement practices that mitigate those impacts. The EIS should describe the management measures that NPS staff and the ranchers are using to safeguard water quality. These include programs such as the US Environmental Protection Agency's 319(H) water quality grants, partnering with the Marin Resource Conservation District on other funding opportunities, and cost-share contributions from the individual ranchers and farmers. These implemented practices are providing the intended benefit and protections and represent the multi-objective solutions critical to achieving NPS goals and mandates for the PRNS/ GGNRA.

MCL, consistent with the State of California and beyond, is deeply concerned and committed to finding solutions for climate change, including greenhouse gas (GHG) emission reductions. Through its Climate Action Work Group, MCL has worked closely with the County of Marin and other stakeholders to develop a relevant Climate Action Plan (CAP) for Marin in response to California Assembly Bill 32. The Marin CAP provides an accurate inventory of GHG emissions for Marin County, including 5% from agriculture that is consistent with California and United States inventories. Furthermore, the Marin CAP recognizes the potential that agriculture represents, through conservation practices, to be a net sink of carbon and provide offsets that make significant contributions to obtaining Marin CAP GHG emission reduction objectives. To this end, the Marin County Board of Supervisors recently passed the "Drawdown: Marin" goal. MCL recommends that the GMP Amendment and EIS analyze GHG reduction strategies that can be implemented at agricultural operations on PRNS/GGNRA (e.g., carbon sequestration management practices).

Glossary and Index

We believe the GMP Amendment process would facilitate better community participation through the inclusion of a glossary of terms in the Draft EIS. Examples include but are not limited to terms

like operational flexibility, carrying capacity, and visitor experience.

As described in the NPS NEPA Handbook (2015, page 95), we assume that an index will be included in the Draft EIS. MCL supports this and believes it would make it easier for the public to quickly find where specific topics are discussed.

Conclusion

MCL played a significant role in the initial establishment of both PRNS and GGNRA and has supported them for decades as incomparable public assets. MCL has also enjoyed a long, successful, and rewarding relationship with Marin's agricultural community that united with the NPS to realize the shared goal of protecting an open and connected landscape from significant residential development that could have decimated that landscape. The success of this relationship, a working landscape with strong community ties, economy, and connected landscapes and ecosystems, is a model that has been studied in an attempt to replicate it nationally. Those original benefits and achieved goals are being multiplied forward through new, unforeseen benefits such as the opportunity for a vibrant local food system and provision of climate change solutions, among other ecosystem services. These are ideals held and pursued throughout California and nationally. They are already being realized in Marin County, including on the PRNS/GGNRA ranches and farms.

The GMP Amendment process is a timely opportunity to again embrace the purpose and intent of preserving ecosystems and protecting working landscapes and the families that manage them because of the dividends this will pay going forward for the environment and community. MCL recommends that an alternative be considered and thoroughly analyzed in the EIS that embraces these mutual and integrated benefits, and reflects our comments above to continue PRNS/GGNRA ranching and dairy farming.

Thank you for considering these comments.

Respectfully,



Kate Powers
President

Attachments: Marin Conservation League Agricultural Policy Statement

Marin Conservation League Agriculture Policy Statement

OVERVIEW

Two hundred and fifty-five families operate Marin County's farms and ranches. Most of these are multi-generational ranches with annual gross incomes of less than \$100,000.00 and an average size of 600 acres. These ranches are located on 167,000 acres of hilly grassland and mixed oak woodland in rural Marin County. Included in this number are at least 28,000 acres of ranchland in the Golden Gate National Recreation Area and Point Reyes National Seashore, which are subject to federal jurisdiction.

The most productive use of the great majority of Marin's agricultural land is livestock grazing. Relatively dry and cool marine climatic conditions along with steep rolling hills and relatively little water are defining factors. An exception is the less than 1% of prime land, which is suitable for row cropping.

Agriculture is one of the ten major business ventures in Marin, and therefore valued as a critical element in supporting Marin's economy. Flexibility and diversification over the last 30 years have enabled agriculture to remain economically viable. Where conventional milk and beef production were the foundation of the Marin agricultural economy for many decades, now value-added and specialty products and services augment the base. For example, grass-fed beef, pastured poultry and eggs, on-farm cheese-making and small-scale organic row and tree cropping, as well as bed and breakfast accommodations, are some of the newer agricultural ventures contributing to the agricultural economy. Organic milk production accounts for more than 40,000 acres being in organic certification, far above state and national rates. The purchase of conservation easements by the Marin Agricultural Land Trust (MALT) has helped about half of the ranch operations to stay in business.

On-going threats to Marin's agricultural community remain much as they have been in the past: skyrocketing property values, which encourages urbanization, family succession challenges, invasive plants, and, more recently, uncertain climate and rainfall conditions. Along with A-60 zoning, supportive Countywide Plan policies, and

strong Coastal Zone protections, the purchase of conservation easements by the Marin Agricultural Land Trust and enrollment in the Williamson and Super Williamson Acts has helped stay the hand of developers and estate ranchers. Ninety percent of Marin's ranches are protected in this way.

The vast majority of ranches and farms are generational family enterprises, which has effectively raised sustainable standards and made owners better guardians of the land. As stated in the Land Use Plan (p. 12, 3rd para.) of the Local Coastal Plan, and adopted by the Marin Board of Supervisors, "More than 85% of Marin farms had between one and four family members involved in their operation, and 71% had a family member interested in continuing ranching or farming."

Marin's ranchers have demonstrated a high level of voluntary participation in beneficial conservation practices over the past 30 years. Implementation of conservation practices has improved water quality, created wildlife habitat, prevented soil loss and sequestered carbon. More than 25 miles of creeks have been restored and more than 650,000 cubic yards of sediment have been kept out of creeks and the bay. Marin's ranches, with their extensive grasslands and forests, are expected to help Marin County reach its Climate Action Plan goals. Ranchers are supported in their conservation practices by a suite of strong federal and state laws, standards, and regulations and effective county policies and code, all designed to protect environmental resources on agricultural lands.

STATED GOAL

To continue to support the role Marin's agricultural community plays in maintaining open space, protecting wildlife corridors, managing carbon, preserving a valuable local heritage, and contributing to food security and the local economy. This statement is consistent with MCL's previous positions and actions regarding agriculture.

POLICY

As approved by the Board of Directors on November 17, 2015

Following are policy statements that specify and clarify Marin Conservation League's goals and concerns.

Natural Resources Management:

1. Support sustainable management of grassland and rangeland, which provides critical forage for livestock, while fostering wildlife habitat and preserving native plants.
2. Support soil management practices that lead to increased water-holding capacity and an increase in organic matter in the soil.
3. Support soil management practices such as the use of the "no-till drill", which minimize soil disturbance, prevent soil loss and reduce the flow of sediment into streams, bays and the ocean.
4. Encourage the alignment of local conservation programs and practices with the goals of the Healthy Soils Initiative as described on the California Department of Food and Agriculture website.
5. Support development restrictions within 100 feet or more of wetlands and stream conservation areas, as defined in the Countywide Plan (BIO-3.1 and 4.1) to protect wetland and stream habitats.
6. Support the management of invasive plants through Integrated Pest Management, including chemical measures, where other control measures are infeasible or ineffective.
7. Support the federal Clean Water Act 1974 and Endangered Species Act 1973, and California's Porter-Cologne Act of 1969 because of their broad powers in protecting natural resources.
8. Encourage those conservation practices that reduce the delivery of pathogens, sediment, mercury and nutrients to our waterways and all bodies of water.
9. Promote the efficient use and reuse of water on farms and ranches to meet their

agricultural needs. Maintain water infrastructure, and if old sources become insufficient, consider developing new sources of water only if adverse environmental impacts can be avoided.

10. Support carbon farm planning and implementation of the United States Department of Agriculture's Natural Resource Conservation Service's carbon-beneficial practices.

11. Support assisted ranch management planning and cost-share implementation of best management practices, rather than depend principally on enforcement to attain compliance with environmental regulations.

12. Encourage efficient energy management and the production of renewable energy resources on and for individual ranches, such as wind, solar and methane digestion, where adverse environmental impacts can be avoided.

13. Discourage the development of large wind and solar "farms" on agricultural lands for commercial purposes, due to energy production inefficiencies, installation and transmission impacts, visual impacts such as disharmony of scale and inconsistency with rural character, and environmental impacts such as wildlife and habitat degradation.

14. Encourage greenhouse gas reduction and climate adaptation practices, as described in the U. S. Department of Agriculture's "GHG and Carbon Sequestration Ranking Tool."

Partnering Agencies:

15. Support the Grazing and Dairy Permit Waiver Programs of the Regional Water Quality Control Board.

16. Support funding and technical support to farmers and ranchers seeking to improve water quality and fisheries habitat.

17. Support national, state, local, and private funding for conservation implementation programs through Marin Resource Conservation District, Marin Agricultural Land Trust, and Natural Resources Conservation Service.

18. Support landowner education and permitting facilitation through county-

funded positions, such as the Marin Resource Conservation District's Stream Coordinator position and the University of California Cooperative Extension's Agricultural Ombudsman position.

19. Encourage the County to control invasive plants on County rights of way and on open space preserves, to prevent invasives from spreading onto ranchland.

20. Support coordination programs between permitting agencies, such as the Marin Resource Conservation District's Coastal Permit Coordination Program, which bundles permit requirements over several agencies to promote efficiencies and to reduce the financial burden on agencies and landowners.

21. Support the inclusion of the Local Coastal Program permitting requirements in the recertification of the Marin Resource Conservation District's Coastal Permit Coordination Program.

22. Endorse the role of Marin Agricultural Land Trust, Marin Resource Conservation District, the Natural Resources Conservation Service, the Ag Institute of Marin, the Marin Dept. of Agriculture, the Marin Community Development Agency and the University of California Cooperative Extension Service, the Regional Water Quality Control Board, and the California Department of Fish and Wildlife in preserving and protecting Marin County's agricultural heritage and natural resources, and supporting the best management practices which foster long range productivity and environmental protection.

Zoning and Land use:

23. Support a "critical mass" of agricultural production (e.g., sufficient number of dairies, acres of beef production, small-scale crops, etc.) needed to maintain the demand for goods and services that are necessary to support a viable agricultural economy in Marin County.

24. Balance ranchers' desire for flexibility in cropping decisions with the need to not exceed impact thresholds or standards for grading quantities (e.g., terracing), irrigation, and setbacks from streams, wetlands, and other sensitive resources.

25. Support Marin Countywide Plan and Coastal Zone policies that limit residential

development on agriculturally zoned land, and limit the size of farm residences.

26. Limit development of farm dwellings and ancillary structures to clusters within 5% or less of total ranch acreage. (See Marin Countywide Plan AG-1.6).

27. To facilitate intergenerational succession on family farms in the Coastal Zone, support up to two dwellings in addition to the farmhouse per “farm tract” (defined as all contiguous lots under common ownership), as conditioned in the Land Use Plan of the Local Coastal Program, adopted August 25, 2015 by the Board of Supervisors.^[i]

28. Support affordable, safe and healthy housing for Marin’s largely permanent farm workforce both on-farm and in nearby villages.

29. Support policies, programs and zoning that restrict subdivision of agricultural lands by requiring demonstration that longterm productivity of agricultural on each parcel created would be enhanced. (See Marin Countywide Plan AG-1.5).

30. Maintain a minimum A-60 zoning, as it has been instrumental in protecting agriculture, maintaining open space values, and preserving the rural character of West Marin.

31. Support the County of Marin’s Affirmative Agricultural Easement Program and MALT’s Mandatory Agricultural Easement Program, which are listed in the LUP of the LCP as a program to evaluate: Program C-AG-2b Option to Secure Affirmative Agricultural Easements Through Restricted Residences...etc.

32. Support small-scale diversification and value-added production (such as cheese production), and services (such as bed-and-breakfast or non-profit farm tours) consistent with County policy and code, where adverse environmental impacts can be avoided.

33. Balance development of new retail farmstands with the need to protect viewsheds and safety on Highway One.

34. Encourage internet capacity expansion in the rural areas of Marin, avoiding negative visual impacts to ridgelines and viewsheds.

35. Discourage expansion of vineyards due to their negative impacts on soils, water quantity and quality, and wildlife habitat.

36. Support prohibition of incompatible and environmentally damaging recreational uses, such as motorcycle riding and off-road biking, on agriculturally zoned land.

37. Encourage the restoration of traditional and iconic ranch structures, such as wooden barns and outbuildings, to maintain the cultural landscape of agriculture in West Marin.

Footnote to Item #27 _____

[1] Excerpted from Land Use Plan policies C-AG-5 A. and AG-7, agricultural dwelling units, including intergenerational housing, may be permitted in C-APZ zoning districts, subject to the following conditions: dwelling units must be owned by a farmer or operator actively engaged in agricultural use of the property; no more than a combined total of 7,000 square feet (plus 540 square feet of garage space and 500 square feet of agricultural-related office space) may be permitted per farm tract; intergenerational farm homes may only be occupied by persons authorized by the farm owner or operator; a density of at least 60 acres per unit shall be required for each farmhouse and intergenerational house (i.e., at least 180 acres required for a farmhouse and two intergenerational homes); no more than 27 intergenerational homes may be allowed in the County's coastal zone; permitted development shall have no significant adverse impacts on environmental quality or natural habitats; all dwellings shall be placed within a clustered development area; and development shall be sited to minimize impacts on coastal resources and adjacent agricultural operations.

References:

Three Essential Documents:

1. 2007 Marin Countywide Plan

<http://www.marincounty.org/depts/cd/divisions/planning/2007-marin-countywide-plan>

2. Development Code (aka Zoning Ordinance)

https://www.municode.com/library/ca/marin_county/codes/code_of_ordinances?nodeId=TIT22DECO

3. Zoning Maps*

(<http://www.marinmap.org/Html5Viewer/Index.html?viewer=mmdataviewer>)

* MarinMap serves up County geographic data including Zoning. There doesn't seem to be a free-standing Zoning Map accessible on the web. The *MarinMap* screen shot *County Zoning* document provides a generalized picture of the Zoning, and a *MarinMap Viewer* set to Zoning can be used on the above website with the "Layers" toggled on or off as shown to get more refined information.

Hart, J. 1991. *Farming on the Edge: Saving Family Farms in Marin County, California*. University of California Press. Berkeley, CA. 174 pgs.

ICF International. 2015. *Marin County Climate Action Plan (2015 Update)*. July. (ICF 00464.13.) San Francisco. Prepared For Marin County, California.

Marin County Department of Agriculture. 2015. *2014 Marin County Livestock & Crop Report*. Marin County Department of Agriculture. Novato, California. 8 pgs.

Marin Economic Forum. 2004. *Marin County Targeted Industries Study*. Prepared for the Marin Economic Forum and The Community Development Agency by Economic Competiveness Group, Inc. San Rafael, CA. 22 pgs.

NRCS. 2015a. *Comet-Planner: Carbon and Greenhouse Gas Evaluation for NRCS Conservation Practice Planning*. USDA Natural Resources Conservation Service and Colorado State University. <http://www.comet-planner.com/>.

NRCS. 2015b. *Practice Standards for Greenhouse Gas Emission Reduction and Carbon Sequestration*. USDA Natural Resources Conservation Service. <http://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/air/?cid=stelprdb1044982>.

SFRWQCB. 2013. *Renewal of Conditional Waiver of Waste Discharge Requirements for Grazing Operations in the Tomales Bay Watershed*. Resolution Order No. R2-2013-0039. Oakland, CA. 20 pgs.

SFRWQCB. 2015. *Renewal of Conditional Waiver of Waste Discharge Requirements for Existing Dairies within the San Francisco Bay Region*. Resolution Order No. R2-2015-0031. Oakland, CA. 19 pgs.



Marin Audubon Society

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2017 NOV 15 AM 10:32

POINT REYES NS

November 13, 2017

Pt. Reyes GMP Amendment
Cynthia MacLeod, Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

RE: GENERAL MANAGEMENT PLAN AMENDMENT

Dear Superintendent MacLeod:

Thank you for the opportunity to comment on the range of conceptual management alternatives for the Point Reyes national Seashore. We offer several overall comments and recommendations as well as comments and questions related to specific alternatives identified in the public notice and at the meetings.

We strongly recommend that the plan address the following:

1. Natural Resource Protection - While natural resources are mentioned in a few of the alternatives, none of the alternatives mention what resources will be included. Understandably, the alternatives focus on Tule elk and ranching, but there is no indication that the many native and migratory bird species that depend on the Pt. Reyes Peninsula would be given adequate consideration nor is it clear how native plants would be addressed.

The Range Management Program description states that the range program works with ranchers to implement BMPs to protect sensitive resources including water quality, and rare and endangered species. While this is required, the many other nesting and migratory birds also need to be protected. Habitat needs of native and migratory species should be identified along with areas of the park that are especially important for wildlife.

2. Natural Resource Alternative - Provide an alternative that maximizes benefits to natural resources of the Seashore. One feature that is lacking in the current conditions and alternatives is one which would allow the elk and other wildlife to move between the peninsula and the wilderness area. Connection corridors between habitats is a recognized essential component of habitat systems for many species. We strongly recommend that an alternative be developed that ensures the elk and other wildlife have a corridor through which to move between larger habitat areas of the seashore. This alternative should also focus on restoration and enhancement of Seashore habitats.
3. Impacts of Alternatives - Some components of the various alternatives could have unintended consequences. With the heavy focus on visitor uses and identifying additional visitor experience, significantly increased use could be anticipated. It is essential that impacts on wildlife and

habitats resulting from anticipated increase in use, be identified and analyzed. Impacts on traffic could also occur. Habitat needs for native and migratory species and the areas of the park that are especially important for wildlife, should be identified.

Our comments on specific alternatives and issues they should cover, are below. Some of our comments and questions apply to multiple alternative as they have the same components.

No Ranching and Limited Management of Tule Elk

How large are the two ranches with life estates?

Bullet two states that many of the areas would be converted to visitor serving recreation. This is not in keeping with the natural resource focus of the Seashore. We recommend that most of the lands that are vacated, be restored to wildlife habitat. One of the primary reasons visitors come to this Seashore is to view wildlife.

What would eliminating acres of dairy and beef ranching mean to the viability of dairy ranching in Marin, if anything? It is often heard that with each dairy ranch that goes out of business, the viability of ranching as a whole is threatened. Is this still the case with the focus on organic dairy, and the already occurring change of many ranches to beef operations?

No Dairy Ranching and Management of Drake Herd

With no population management of the elk, what is the risk that they eventually go out of the park? What is the relevance and importance of that and how would it be construed?

Describe how the grassland habitats change or differ with dairy and beef cattle ranching?

Describe how the elk would be managed. What are the methods that would be considered?

The Seashore resources that would be preserved, must be clearly defined.

The buffers that would be established to protect sensitive resources should be described, i.e. width, characteristics and sensitive resources they are designed to protect. With all of the increased visitor use, how would the buffer restrictions be enforced?

One of the "broad management strategies to protect park resources" should be habitat enhancement and expansion.

Reduced Ranching and Management of the Drake's Beach Herd

Discuss why elk may be moving: for water, forage, other, or all?

How would the decision be made as to what ranches would be closed? What criteria would be used and who would be making the decision?

Describe the approaches for streamlining, and the best management practices that would be streamlined. How would the BMP's be enforced?

Continued Ranching and Management of the Drakes Beach Herd (NPS Initial Proposal)

In considering opportunities for diversification, the impacts of the new agricultural practices/crops must also be identified and evaluated? Growing crops or grazing other animals might have adverse effects on soil, water quality, vegetation, and other habitat components.

How would the "level compatible with authorized ranching operations" be determined? Ranchers are complaining about impacts of the elk. How many ranchers are affected and where are they located?

Continued Ranching and Removal of Drakes Beach Elk Herd

What methods would be used to remove the elk? What is the risk to the elk?

What actions would be used to manage the elk from the Limintour-Estero Road herd?

Continue Current Management

The Residual Dry Matter is currently monitored by the Range Management Program to assess the amount of plant life left after the grazing season. How is this used to control the number of cattle allowed per acre? How does the range management program value the presence of non-native plants in assessing the plant material left at the end of the grazing season? For example, is non-native thistle which thrive in overgrazed soil, considered as a benefit even though they are invasives? Are the numbers of grazing animals reduced or allowed to be maintained or expanded if populations of thistle and other problematic non-natives are found? How are invasive plants considered when evaluating RDM?

What methods are used to control or prevent the expansion of invasive plants? Are these measures required? If so how is that requirement enforced?

Thank you for considering our comments.

Sincerely,


Barbara Salzman, Co-chair
Conservation Committee


Phil Peterson, Co-chair
Conservation Committee

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2017 NOV 14 PM 2:10

POINT REYES NS

*Point Reyes National Seashore General
Management Plan Amendment
NPS Initial Proposal*

Thank you for the opportunity to comment on the General Management Plan Amendment. I would like to see a few additions to the proposal.

The first would be a humane management of the elk herd which has exceeded its carrying capacity by culling and testing those that are carriers of Johne's disease. The elk should be contained and the herd not located within the ranching operations.

The ranchers should not be tasked with all the damages done to their range lands and feed costs that these herds incur. The NPS should take into consideration the destruction and the costly economic factor that the elk incur to these vulnerable ranching operations.

Secondly ranching has been part of this landscape since the 1800's and is a significant cultural and historic part of the Park. The NPS and the ranchers need a set of guidelines and

standards that could streamline and implement current Best Management Practices ie Carbon sequestering, diversification and sustainable farming practices such that PRNS could be a working model for visitors of what and can be done to protect the environment and its resources. These ranches represent one fifth of Marin County's agricultural acreage and production and represent a significant portion of the county's managed coastal grasslands. Presently I am told that the ranchers are NOT allowed to put these practices in use. As we are facing climate change these guidelines and reasonable standards worked out between the Park and the ranchers could be implemented to keep the ranching operations more viable and the natural resources protected.

There is also an educational and cultural factor that has been overlooked as urban people no longer have a connection to how and where their food is produced. At the turn of the century 97% of the population lived rurally whereas today only 3% live rurally. As the population increases the knowledge of these 4th and 5th

generational farms will disappear and the only knowledge will be the “factory farm” model. Farm tours are ways to connect your food and the environment in which it was raised. The emphasis of “grown in Marin” will further the concept of eating locally produced food. My own experience of people meeting my livestock has shown me how magical and timeless that can be. The ranchers need the longer leases as it takes time to meet the standards and guidelines to transition to better practices. The economics needed to do these crucial things require a long view to plan and implement. Ranching is an intensive practice and each season brings with it it’s own challenges.

Pt Reyes National Seashore is an unique treasure of the National Parks. To not acknowledge the historic precedent of the ranching families who have made the landscape what it is today is to rewrite California Coastal history. Thank you.

Susie Schlesinger



David Schnapf, Esq.



November 13, 2017

RECEIVED
2017 NOV 15 AM 10:33
POINT REYES NS

Point Reyes GMP Amendment
Cynthia MacLeod, Acting Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Dear Ms. MacLeod:

These comments are submitted in response to the notice you published soliciting input on “a conceptual range of management alternatives” that you will examine in conjunction with the General Management Plan Amendment (“GMP Amendment”) for the Point Reyes National Seashore and north district of Golden Gate National Recreation Area (collectively “PRNS”). I note that, contrary to legal requirements, the GMP for PRNS has not been updated since 1980, and that the present review is being undertaken only because of a lawsuit over this legal failure.

My wife and I have lived in the Bay Area since 1980, and in Marin county since 1992. I am an avid outdoor enthusiast, and am a frequent visitor to PRNS. PRNS is a unique place providing a wealth of nature experiences that are not available elsewhere. Highlights of my visits always include viewing the wonderful array of wildlife that can be seen in and around the park – elk, whales, elephant seals, harbor seals, sea lions, all sorts of birds, and even, on one occasion, a badger, to name just a few. The tule elk herds are a particularly rare and majestic sight.

Since my first visit to PRNS in 1980, I have been appalled to see the extensive and destructive intrusion of ranching in the park, and the extensive ranch fencing that keeps much if not most of the public park off limits to visitors. This is wholly contradictory to the core purpose of any National Park which are set aside as nature and wildlife preserves.


In my opinion, there is no valid justification to maintain *any* ranching in PRNS. Yet, over the years, the NPS has shown a clear bias in favor of continued ranching. This bias is quite evident at the very outset of the process for the GMP Amendment – five of the six alternatives that the NPS proposes to examine would allow continued ranching. None of the continued ranching alternatives suggests any public interest or benefit in allowing continued ranching. None of the continued ranching alternatives makes any mention of public access to ranch lands or to the ranches themselves. Moreover, no justification is provided for evaluating continued ranching alternatives other than those required by the settlement agreement (the “new alternatives”). These new alternatives reflect continued bias in favor of ranching.

Accordingly, I believe that the range of alternatives that would allow ranching should be restricted to only those required by the Settlement Agreement. There is enough flexibility in the settlement agreement that additional ranching alternatives are not required and will only make the review process more difficult, expensive and time consuming. Moreover, any and all alternatives allowing ranching should be based on the requirement that ranch leases be set at full market rates. There is no justification for subsidizing private businesses in a national park. Further, any and all alternatives allowing ranching should require the ranches to maintain roads and other park facilities in and around their land. Presently, the road to the lighthouse is in constant need of repair due to the heavy truck and commercial traffic generated by the ranches. There is no reason the public should pick up the tab for road maintenance for damage caused by ranching. In addition, all of the ranching alternatives should require full public access to ranch lands, and require all ranchers to establish demonstration projects for visitors.

PRNS is one of the most popular park destinations in the Bay Area, attracting visitors from around the world. These visitors do not come to PRNS to see cows, they come to see nature. I believe that the process for the GMP Amendment should examine additional alternatives that would enhance visitor accessibility and highlight the unique experiences that PRNS has to offer. For example, the establishment of additional campgrounds, hostels and the like would enable more visitors to enjoy the park. Perhaps some of the old farmhouses can be converted to inns or B&Bs. Businesses related to, for example, kayaking, fishing, boating, cycling, would be encouraged under this alternative. Thus, I ask that the GMP Amendment process include consideration of at least one alternative that promotes more intensive recreational and overnight access to PRNS.

Thank you for your consideration.

Very truly yours,



David Schnapt



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2017 NOV 14 AM 11:41
POINT REYES NS

November 13, 2017

Cynthia MacLeod
Acting Superintendent
Point Reyes GMP Amendment
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Subject: Point Reyes National Seashore General Management Plan Amendment First Phase Comments

Dear Superintendent MacLeod,

Thank you for the opportunity to provide comments on the National Park Service General Management Plan Amendment planning process. The Marin Resource Conservation District (Marin RCD) is supportive of agricultural activities and conservation actions that take place within the Point Reyes National Seashore and the north district of the Golden Gate National Recreation Area (NPS) and is pleased to provide suggestions for your consideration in the development of alternatives.

The Marin RCD was created in 1959, following a vote of the district, with a specific mission in mind:

"to conserve and enhance our natural resources. It is our belief that the health of the county's natural landscape is dependent upon a robust agricultural economy and the active preservation of our agricultural heritage. In addition, it is our firm conviction that the agricultural productivity of the county is dependent upon the diligent application of practices which conserve and enhance our natural resources."

Over the last 50 years, we have supported NPS and the ranches in fostering a conservation-based land stewardship ethic. The Marin RCD has partnered with NPS and our sister agency, the USDA Natural Resources Conservation Service (NRCS), in supporting this ethic. NRCS is authorized to distribute USDA Farm Bill funding within our district based on these formal partnerships and collectively we have successfully partnered with many agencies and organizations over the years to match these funds by turning our local plans into meaningful conservation actions. It is our responsibility to establish a solid set of community values that will direct our future endeavors. It is for these reasons the Marin RCD believes the General Management Plan Amendment to be critical in developing a sustainable future for agriculture.

The Marin RCD is responding to three specific questions suggested in the NPS letter to Interested Parties: "How can Point Reyes protect and manage the diverse and important natural and cultural resources in the planning area", "Are there opportunities that could enhance future stewardship in the planning area", and "What types of specific strategies can/should be considered for managing agricultural leases/permits" ***The Marin RCD recommends NPS protect the important natural and cultural resources within the pastoral***

zone by incentivizing and streamlining the delivery of stewardship projects and by establishing a programmatic structure that supports environmental stewardship. We offer the following suggestions:

1. **Hire technical support staff for the ranching community.** NPS currently employs 1 full time permanent (career seasonal) and 1 full time temporary (term) position dedicated to ranching in the pastoral zone across 28,000 acres. The implementation of stewardship practices requires careful design, permitting and construction planned by NPS personnel. Increasing agricultural technical staff from 1 to 3 fulltime permanent positions will provide a support system that will broaden NPS' agricultural knowledge, provide technical assistance to the ranchers, enable ranchers to complete conservation projects expeditiously and result in the increased implementation of stewardship practices.
2. **Facilitate practice implementation by establishing pre-authorized federal approvals for common stewardship practices.** Each proposed stewardship practice is required to be authorized through the NPS Planning, Environment and Public Comment (PEPC) process on a case by case basis which can cause anywhere from 3-24 week delays in implementation. A list of NPS pre-authorized stewardship practices will enable NPS staff to streamline the approval process in a way that supports the ranchers forward in project implementation. The Marin RCD has developed such a program for compliance with the California Environmental Quality Act (http://www.marinrcd.org/wp/wp-content/uploads/2014/01/Final-PCP_IS_MND_20101110.pdf). Furthermore, a pre-authorized list of practices will provide clear natural resource protection guidance and enable ranchers to work with NRCS and Marin RCD in developing ranch water quality and carbon farm plans that strategically guide long-term management thereby resulting in meaningful and measureable improvements.
3. **Provide cost-share funding for environmental projects in the pastoral zone.** The ranches are motivated to improve natural resources. In the last several years, NPS has secured federal Clean Water Act funding to assist the ranches with water quality improvements. This type of assistance to the ranchers should continue to be supported and expanded to include practices that support soil health, climate resiliency and greenhouse gas (GHG) reduction. Soil health plays a direct role in agriculture's ability to adapt to variable climatic shifts in addition to soil's ability to fight climate change. This is a concept supported by the State of California's Healthy Soils Initiative and the NRCS Environmental Quality Incentives Program. A 1% increase in organic matter results in as much as 25,000 gallons of available soil water per acre (Kansas State Extension Agronomy e-Updates, Number 357, July 6, 2012); an important benefit during periods of drought. Additionally, NRCS has identified several practices (http://comet-planner.nrel.colostate.edu/COMET-Planner_Report_Final.pdf) such as no-till farming, rangeland seeding, nutrient management, mulching and rotational grazing that offer this benefit to our pastoral soils. They are designed to increase infiltration, reduce evaporation, moderate soil temperature changes, increase rooting depth, increase nutrient uptake, and improve the water-holding capacity for most soils. Finally, these practices, when managed well, offer exceptional GHG reduction benefits. The application of organic amendments to soils has the ability to increase soil carbon by 50 metric tons C per ha in the top meter of soil (Ryals et al, 2015. Ecological Applications, 25(2): 531-545). Many of these conservation practices support our farmers and ranchers in enhancing sensitive ecosystems

(windrows, buffer strips, grassed waterways, hedgerows, riparian forest buffers, silvopastures). They are designed to increase infiltration rates and decrease runoff, thereby reducing sediment and nutrient loading to streams.

(<https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/soils/health/mgnt/?cid=stelprdb1257753>).

4. **Provide 20 year leases automatically renewed in 5 year increments.** PRNS ranchers have demonstrated a strong interest in the implementation of stewardship practices that have been slowed by short-term leases conflicting with long-term maintenance requirements. The Marin RCD and NRCS require 10-20 year maintenance and monitoring agreements to qualify for our programs. Additionally, when a rancher nears the end of a long-term lease, they are left in the same noncommittal predicament. A 20 year renewable rolling lease in 5 year increments would enable lessees to qualify for stewardship programs on a consistent basis, regardless of lease year and fosters a stewardship ethic that spans multiple generations. It is this type of cultural knowledge of the land that is passed through the generations and melded together with NPS ideals to inform adaptive management. Furthermore, the assurance of tenancy supports continuous land management requirements (i.e. erosion control and weed management) transcending NPS budget cuts associated with changes in administration.
5. **Establish a Rancher Advisory Council** to support stewardship-based agricultural land management activities. An advisory council can work with NPS to help inform and guide a sustainable future for agriculture including the diversification of agricultural activities adjacent to sensitive environments. The ability for the ranches to diversify and adapt to market trends is critical to the strength overall agricultural community. NPS ranches constitute 19% (\$18.3M) of total agricultural production in Marin County. Their survival is essential in sustaining a local food source for Marin County residents. Consequently, the health of our natural environment is essential to agriculture's sustainable future. An advisory council can guide a robustly supported land stewardship program and provide the perfect opportunity to model ranching and ecosystem health and the mutual benefits offered by both.

The Marin RCD strongly supports these ranchers and NPS in being national models of sustainable land stewardship and we offer our assistance in any way that is beneficial to both parties. Please do not hesitate to contact us for additional information or clarification (415) 663-1170.

Sincerely,



Nancy Scolari
Executive Director

November 8, 2017

Cicely A. Muldoon, Superintendent
Point Reyes National Seashore
One Bear Valley Road
Point Reyes Station, CA 94956

RECEIVED

2017 NOV 14 AM 7:19

POINT REYES NS

Re: Point Reyes National Seashore and North District of Golden Gate National Recreation Area

Dear Cicely A. Muldoon and To Whom It May Concern,

Thank you for giving us the opportunity to comment on the PRNS and GGNRA General Management Plan Amendment environmental review and EIS for the November public scoping period.

In 1859, C Ranch lands were settled by noted inventor; engineer Capt. Oliver Allen for a future site for a dairy farm. This dairy site is now an organic small scale dairy farm consisting of natural grass pastures to feed dairy cattle. Our family, fourth and fifth generations take great pride in the area that we have lived and worked on since 1946. We implement sustainable, organic Best Management Practices. We take care of the lands, waters, wildlife and historic structures. We are environmentally certified and also are adding more carbon farming to our family dairy practices. Our goal has been and continues to be a producing farm that supplies quality organic milk for consumer local and far while taking care of the natural and cultural resources in our area.

Our family has looked over all the alternatives listed in your General Management Plan Amendment. In your Additional Preliminary Conceptual Alternatives under Consideration : "Continued Ranching and Removal of the Drakes Beach Tule Elk Herd" would be the best fit and equally fair for all ranching at Point Reyes National Seashore and Golden Gate Recreational Area, if you "add" in Removal of Tule Elk off the Limantour-Estero Road ranchlands as well to this alternative. We would like to see if it is possible to add an extension on the 20 - year leases/permits for ranchers wishing to pass the legacy on to their family members. This will help rancher maintain a long standing commitment to preservation of the historical ranch and its natural resources on the lands.

If we chose "No Ranching" or even "Reduced Ranching", agriculture would be an economic loss for West Marin along with its history. Many jobs, companies as well as the consumers that have been affiliated with these historical ranchers would be affected. The public will have to seek agricultural products that will not be local and the community will be forever changed. In addition, "Reduced Ranching" is a selection of some ranchers to stay while others must shut down is not a choice for us. We believe in

equality and fairness for all ranchers involved in this General Management Process. We are a small community and we support one another and have so for years and years.

“Removal of Drakes Beach Tule Elk along with Removal of All Tule Elk Permanently off All Ranches” is the only management practice that will keep ranching alive on the Pastoral Zone. Ranchers for many years were promised that elk were not to conflict with ranchers infrastructure. The Tule elk were not a part of any lease or agreements. ‘The 1998 Point Reyes National Seashore Tule Elk Management Plan and Environmental Assessment’ provided protection for ranchers when the public chose Alternative ‘A’. Past Superintendents placed elk back in their 18,000 acres of Limantour/Phillip Burton Wilderness that was set aside for them in this plan if they were bothering ranchers.

Today, there are over 150 Tule elk that are out of their designated wilderness area. Our family has wrote numerous letters, made phone calls, attended meetings, sent emails to the Point Reyes National Seashore for well over 10 years to ask for elk to be placed back into the Wilderness area with no luck. (Enclosed is our first letter sent to Cicely A. Muldoon when she started at Point Reyes as the new Superintendent.) The elk damage in our area is costing us more money to buy more and more feed for our dairy cattle, because there is little grass left for the cattle due to the 110 elk grazing on our rotated pastures. Over the years, we have cut our dairy cattle herd numbers in half to remain in compliance to meet grazing standards for forage amounts left on ground each year. We have tried every angle to keep viable, but we are getting close to the end if these elk are not relocated. These elk should be managed as a Natural Free-Range herd in a wilderness area where they are not hazed through fences and do not have to forage on ranches’ hay and drink out of livestock watering areas. The hazing of elk in the morning hours through cattle pastures is a waste of time, elk health and tax payer dollars. These elk are full from feeding all night and come right back into the areas that park staff haze the elk from to eat again through the next night. These elk need to be managed in a wilderness area, the area that was meant for them to thrive and be wild. The elk need to have sufficient natural forage and running water to keep them healthy, meanwhile helping with fire prevention. Many years have passed since elk encroached on ranches and the elk population is escalating so much that elk damage on ranches is accruing more and more. It is to the point of placing both the elk and the rancher at risk with disease transmission and certification loss for pasture grazing requirements for Organic Pasture Rule and PRNS Grazing Standards. Ranchers would like to continue pasture improvement with weed control and planting of native grasses as in years past. There are fences down, cattle missing, dairy cattle not milked, cattle bred by a neighbor’s bull to young, farm equipment damaged, cattle gored, pasture grass forage competition, hay loss, disease contamination, dry stock ponds due to breaking pipes, all by elk. These are just a few of the many conflicts as why elk and cattle need separation. There is a place for both cattle and elk at Point Reyes National Seashore. The cattle are to be on the Pastoral Zone that was set aside for them when ranchers sold their land to make the Point Reyes National Seashore in 1962. The elk are to remain in the Wilderness at Limantour according to the

1998 Elk Management Plan that the National Park Service states that they are still following.

Ranches in the Seashore have all used some form of "Diversification." It may be new or a historic method of remaining viable in hard times. That is why in all leases/permits we are able to have 10 other livestock to add or delete in a business or climate change. These diversification actions are a way that ranchers can keep up with the local food system and add to the scenic beauty of agriculture production that visitors can see and learn by.

Secretary of Interior, Ryan Zinke, issued an order (S03355) directing agencies within the Dept. Of The Interior to complete EIS processes within one year and to limit the final EIS document to 150 pages. We ask that the Point Reyes National Seashore file the NOI this fall as they had planned to do. The Point Reyes National Seashore would like to wait three years before they file the NOI so that the NPS will comply with the new secretarial order. Ranchers can not wait that long for the elk to be managed properly. The elk need solitude, forage, and running water from the wilderness, not hay and grass from the rancher's cattle pasture.

Our family continues to communicate with the Point Reyes National Seashore regarding ranching in the Seashore and we hope that we can work together on what is best for all historical cultural and natural resources into the future.

Sincerely,
Ernie, Nichola & Ernest Jr. Spaletta
C Ranch/Spaletta Dairy
Point Reyes



2.

Hand given to
Mrs Cicely Muldoon
10/28/11

Spaletta Dairy
22000 Sir Francis Drake Blvd.
Point Reyes, Ca 94956
(415)669-1202

October 28, 2010

Dear Cicely A. Muldoon-Superintendent Point Reyes National Seashore,

Ernie, Nichola and Ernest Spaletta Jr. ask that you please remove the elk heard off of "C" and "D" ranches that we are leasing from the Dept. of Interior N.P.S. in the Point Reyes National Seashore.

We feel that the herd is growing in numbers and our dairy farm can not continue to operate in a profitable manner. Spaletta Dairy has had numerous concerns about the elk grazing and running freely across our operations for over the last three years. Building a fence near our leased ranches would place the elk on our neighbor's leased lands. This would not be fair to our neighbors. A fence would also have to be placed on sandy beaches. Erosion would take place do to sand movement. Elk may escape.

We feel that the elk need to be removed off the dairy and beef ranches along Sir Francis Drake Blvd in the Point Reyes National Seashore.

Spaletta Dairy "C" ranch has 590 graze able acres. This is a pasture ranch, no crops are grown to support feed for cattle. We rely on good pasture management to support our feed program and to be profitable. The "D" ranch has 131 acres and is also strictly pastureland. These two rented ranches can not support elk grazing along with our dairy cattle. We rotate fields and let them rest for a period of time. We use liquid and dry manure spreaders to enhance proper nutrient growth in grasses. We brush cut and seed with natural grasses to improve pasture quality. These elk have found our grasses to be the tastiest and will not leave our ranches. They eat all our forage and damage our fences. The elk also have broken our irrigation system and destroyed our electric fencing and boxes. The elk run with our cattle herds and make it hard for us to contain our dairy cattle in their proper pastures, because they create holes in fencing on a daily basis. We also have had problems with the bull elk at breeding season goring our cattle. We have lost two heifers and one is still ill in the field from being hit by an elk.

Other great concerns are the many diseases that elk may produce and transfer, Johne's, Chronic Wasting Disease, Scabies, Brucellosis, and Bovine Tuberculosis. We vaccinate our dairy cattle and or do not have these diseases present in our herd. We have a licensed veterinarian on a regular basis oversee and vaccinate our dairy cattle. These elk graze off our pastureland and drink from our water sources on a daily basis. They could easily wipe out the Spaletta Dairy milk operation with the diseases that they might introduce into our livestock. They are not vaccinated or all checked for being a Johne's carrier.

We hope that we all can come to an agreement on how to manage the growing elk population on Sir Francis Drake Blvd. in the Point Reyes National Seashore.

Sincerely,

The Spaletta Family
Ernie, Nichola, Ernest Jr.

Spaletta Dairy

October 28, 2010



Dear Cicely A. Muldoon-Superintendent Point Reyes National Seashore,

Re: ELK DAMAGE TO "C" and "D" RANCHES LEASED BY SPALETTA'S

2- Electrical Panel Boxes @ \$ 219.00 each	\$ 438.00
8- Rolls of Barbed Wire 10,632ft @ \$ 67.99 each	\$ 543.92
1- Box Fencing Staples 50lb @ \$ 89.00 each	\$ 89.00
4- Bags of Fencing Clips 100ct @ \$ 5.99 each	\$23.96
2- Rolls of Barbed Less Wire 2658ft @ \$ 70.00 each	\$ 140.00
8- Rolls of Electrical Fence Wire 10496ft @ \$ 39.95 each	\$ 319.60
25- Aluminum Irrigation Pipes 4"x 30ft @ \$ 110.00 each	\$ 2750.00
75- Fiberglass Electrical Sticks @ \$ 2.50 each	\$ 187.50
3- Electrical Fencing Clips 25ct @ \$ 6.50 each	\$ 19.50
1- Sprinkler PTO System Repaired	\$ 232.29
350- Wood Fence Post 8' Long @ \$ 14.95 each	\$ 5232.50

TOTAL \$9976.27
 Tax @9.000% \$ 897.86
 TOTAL \$10874.13

Above Items purchased at M. Maselli & Sons Inc, SC Barns Buildings & Fence, Rain for Rent and General Dairy-Dairy Animal Equipment

Labor for Fence Building for last three years. 1hour a week @ \$ 30.00 a Hr. \$4680.00

Forage Lost by Elk each year off of "C" & "D" Ranches leased by us.

4-Loads of Medium Grade Alfalfa Hay- Test 54 TDN @ 150.00 a Ton Delv.
 (Average 56,000 LB. a truck load) @ \$ 4,200.00 each \$ 16800.00

This bill does not include water consumed by elk from ranch "C" & "D" water resources. Spaletta Dairy buys Park Water @ 3.37 a CF. We have to purchase water from the park while the elk drink the water that we save for our cattle. This is costly to us.

We are fixing fence now on an almost day to day basis. These costs are rising each day as the elk stay and eat on our leased ranches. We can not contain our cattle in their proper fields due to elk damaging our fences. Total Cost Of Elk Damage \$ 32,354.13

Please work with us on a solution to this costly damage that the elk are doing to our dairy operation.

Sincerely,

The Spaletta Family
 Ernie, Nicholas & Ernest Jr.

TO NPS PARK PLANNING

(no address)

My comment is regarding the Point Reyes National Seashore Planning, for ranchers in residence on the Park Land.

I am a resident of West Marin County, bordering PRNS. My sister and her husband (the Spallettas) own an, organic dairy ranch, in the Park Seashore Area.

I am concerned about them losing their lease for continued ranching, as well as all the other ranchers in the Park, that are in danger of losing their leases.

These ranches provide, high quality, mostly organic products, for local residents and beyond.

Providing 20 year, renewable leases, by the Park, would keep ranching families together for continued work, (most of these family ranches go back, generations!) in providing organic milk, beef, and other quality products.

My other concern for my sister's family ranch and all the Point Reyes National Seashore ranches, is the problem of the Tule Elk, that were introduced into the Limantour Wilderness Area, by the Park Service, and was to be maintained by the Park Service, there.

What's happened is, the elk have multiplied and large herds (100 or more) have spread onto the grazing land of the ranches, eating a lot of the dairy and beef cattle's food.

In turn, the ranchers are forced to buy expensive (organic) hay, to make up for the huge loss, of grazing lands.

A solution that the Ranchers agree on is to move the elk herds back to the Limantour Wilderness Area, where there is plenty of forage for them; fence off their area from the ranches grazing land, thus maintaining both, elk and the food providers.

I hope that the Park Service, would consider this, win-win ~~and~~ solution, as soon as possible.

Thank you Michele Stone, Inverness, Ca

RECEIVED
2017 NOV 15 AM 10:36
POINT REYES NS

November 13, 2017

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Dear Superintendent,

I am writing in support of continuing sustainable agriculture in the Seashore and GGNRA. The ranches located there are vital to maintaining the future of agriculture in Marin County. Without these multi-generational ranches that have served the Bay Area for more than a century, there would not be sufficient production to support continued critical services.

As a Marin resident since 1970 I have strongly supported efforts to enhance our incredible coast and enable the West Marin community to protect the coastal environment and ensure economic security for our county's agricultural region. I've watched with great joy the development of environmental sustainability techniques on our area farms that are being copied around the world, as well as efforts within our national seashore to provide enhanced educational opportunities for park visitors to learn about the natural environment.

I have a great sense of pride in knowing that accomplishments made in both Marin agriculture and parks are copied elsewhere in the U.S. and the world at large. Most of all, I'm proud of Marin citizens and government officials for supporting decisions that have made Marin an outstanding example about what diverse communities can accomplish over many years despite disparate points of view at every step.

All of Marin's successes are attributable to people — often with different backgrounds, points of view and strong opinions — who have come together through the decades to reach consensus on what's needed for the common good.

I have been privileged to be a volunteer in many organizations associated with Marin County's environment and agriculture. I served as a Marin County planning commissioner and was the Marin Community

Foundation's program officer for the environment for many years.

I strongly support the continuation of ranching in the Seashore which is critical to our county maintaining a strong agricultural economy and a healthy community with locally produced foods.

Sincerely,



Sallyanne Wilson


Superintendent,

11/20/17

Regarding the amendment.

I vote for the 20 year lease
for the ranches, with diversity
Tule elk need to be
managed at a level
compatible with ongoing
ranch and tle elk.

Sincerely, I am Andrew



RECEIVED
2017 NOV 17 AM 11:27
POINT REYES NS

November 11, 2017

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

To Whom It May Concern:

We appreciate the opportunity to comment on the Point Reyes GMP Amendment (PGMPA) pre-scoping alternatives. The National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGNRA) are truly two of America's treasures and we appreciate the National Park Service (NPS) management of these nationally significant areas.

The Public Lands Conservancy is dedicated to preserving, protecting, and appropriately managing public lands. This is accomplished by raising awareness in the American public about the value of public owned lands and facilitating actions to protect them.

Our comments follow.

1. The timeline for this pre-scoping is unreasonably short. In the future, please provide adequate time for scoping. This will allow a more thorough review by the public.
2. It is not clear what document is being amended by this process. The Frequently Asked Question and Answers (Q&As) state the PRNS GMP 1980 is being amended. However, that document does not contain any information regarding the North District of GGNRA and no environmental analysis is attached. Please clarify which document(s) are being amended to ensure what baseline is being used.
3. This document seems to be only looking at those lands already under agricultural lease/permits without regard for other land uses within the park boundary. Overlaps in the formerly recognized pastoral zoning, current agricultural leasing and the conditional inclusion of some natural and wilderness areas in this document are both awkward and confusing. Please clarify exactly what lands are in the planning area.

4. The presentation of preliminary draft alternatives in this scoping document do not provide enough detail to fully comment on their merits or distinctions. For future scoping activities, the level of detail must be sufficient to ascertain their potential positive, negative and cumulative impacts. For example, terms used such as “diversification,” “ranch core,” and “succession” for ranching operations must be defined to understand their implications and impacts. In addition, the preliminary alternatives do not provide any specifics on additional visitor opportunities or other natural and cultural resource activities. Because the park’s legislation is specific in its guidance about the protection natural and cultural resources, and visitor use, specific strategic policies and actions regarding mandated protection of park resources should be included in future alternatives, (e.g., management of historic structures, invasive species control, rare species protection, and riparian fencing, additional visitor use activities.)
5. The maps are unclear and have several discrepancies. For example, the map on page 11 shows the “free-range elk core use area” as not being included in the planning area. It’s unclear how elk core use areas could not be included and yet evaluated as part of the amendment. Please provide more accurate and readable maps in the next scoping document.
6. The current ranching operations do not follow the current 1980 PRNS GMP. For example, some areas are zoned natural and environmental protection reserves, but are in ranching today. We recommend that implementation of the 1980 GMP Proposed Action be considered as a future alternative.
7. We are concerned about how cumulative impacts will be addressed in the EIS. Areas of impacts that need more evaluation include, but are not limited to ground water and riparian impacts, water supply, water quality impacts and waste disposal considerations.
8. The PRNS does not have a wilderness plan as required by policy and law. However, much of the PGMPA planning area is adjacent to wilderness and will have direct, indirect, and cumulative impacts of wilderness values. We believe additional data and baselines studies need to be completed to ensure the Philip Burton Wilderness is managed to maintain its wilderness character, as required by law. At present, lack of a wilderness plan and baseline information makes characterization of impacts impossible.
9. The viability of agriculture in Marin and Sonoma County is often cited as an important issue. Please ensure updated baseline information on the economic aspects of visitor use and ranching is collected and used in the EIS impact analysis. In addition, economic impacts of overall park use by visitors and secondary effect should be discussed and quantified in the EIS.
10. Tule elk management is a critical issue. We strongly believe the continuation of a managed tule elk herd is important ecologically (restores natural process).and provides for enjoyment for park visitors. The PGMPA should fully address this issues by providing specific guidance to park staff, additional baseline information in affected environment, and analysis of impacts of agricultural operations.

11. This document cites monitoring activities related to agricultural operations and tule elk management currently undertaken by the park staff. Please post the data and results from these monitoring activities with the other park planning documentation.
12. The park's "Initial Proposal" seems to imply an increase in agricultural use from current levels - if not in actual acreage, at least in intensity. While this proposal suggests a minimal decrease in acres under agricultural use, it does not have any correspondent reduction in herd sizes nor does it acknowledge that "diversification" could lead to a net increase of impacts on resources. This alternative needs to be more clearly identified as "Expanded Agricultural Use."
13. We suggest that you change the titling of the "Reduced Ranching and Management of Drakes Beach Tule Elk Herd" alternative to "Preserving Historic Beef and Dairy Ranching" alternative. This more accurately reflects the proposed action and focuses on the historic Point Reyes and Olema Valley ranches. We further suggest that "diversification" and "operational flexibility" be excluded from this new alternative.

We appreciate the opportunity to comment. Thank you for your public service in maintaining and preserving our precious parks.

Sincerely,



Tom Baty
President, Public Lands Conservancy
Box 696
Point Reyes Station, CA 94956



From: Louise Beesley [REDACTED]
Subject: Point Reyes National Seashore General Management Plan
Date: November 17, 2017 at 10:22 PM
To: <https://parkplanning.nps.gov/POREGMPA>

To Whom It May Concern:

Point Reyes NS and environs is a favorite vacation destination for me and for my family. The presence of the ranches is such an integral part of the ambiance, and keeps the area from being just another pretty but sterile park. It is also important to keep the local economy diversified, and allow the area to continue contributing to the regional food supply.

In conclusion, I cast my vote for continuing the current plan, and allowing the management of the ranches and the elk herd to remain as they are today.

Respectfully,

[REDACTED SIGNATURE]

Louise Beesley,
Nevada City, Ca 95959

RECEIVED
2017 NOV 20 AM 10:41
POINT REYES NS

RECEIVED

2017 NOV 17 AM 11: 22

POINT REYES NS

11/14/17

Point Reyes GMP Amendment Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, Ca 94956

Superintendent MacLeod,

As a recent visitor to the Point Reyes National Seashore, I wanted to tell you my views on the park. It seems the NPS favors Elk over ranching. Is there a way to manage the Elk? Perhaps Culled hunting or Birth control? As with any wild animal there is not an easy way to keep them in place.




The ranches have maintained the grazing and kept things looking the way they should. I saw where the elk are "supposed" to be and it is all, total brush. The general public would be much more comfortable walking in an open field than one with brush.


A working farm is a good thing for the terrain, from fencing to weed control and the list could go on and on.

The Elk would be OK if they are in their place, but I am not sure that is doable. I think the ranching is a win win.

I hope you will consider all of this. It is a beautiful park and the farmers/ranchers have helped keep it that way.

Thank you



Mary Ann Cooley




Monday 21 2017

Superintendent,
Point Reyes National Seashore,
1 Bear Valley Road, 94956

Re: General Management Plan Amendment.

I am disappointed to learn that the National Park service is planning on extending leases for ranches on public land.

Point Reyes National Seashore is a major tourist attraction.

In 2016 Marin county's national parks generated tourist income of \$565 million, according to the Sweeney article in North Bay business article.

Stacy Carlson, Marin Agricultural commissioner reports 2016 figures for animal agriculture in Marin of \$79,459,000 . Down \$14,555,000 from 2015. He cites the reason was a fall in the price of cattle, even though Marin cattle production had increased.

This may indicate that the that demand for beef and meat products is declining.

So why are we forfeiting our parklands for ranching?

I suggest we focus on using the parks to encourage tourism and return the area to its natural state and allow the native animals to thrive.

Marin Board of Supervisors voted in March 2017 to allow animal slaughter in Marin county. This is means that animals are slaughtered on park land with little or no oversight. Is this activity likely to attract tourists? Now there is talk of killing the Tule elk, native to the area and at one time facing extinction.

Herds of elk in the parkland would be a tourist attraction. The small number allowed (and controlled by the park service presently) are rarely visible.

Animal agriculture is a major factor in climate change that people are hesitant to address. The National Park service has the opportunity to protect the land by not renewing leases for ranching.

Please take a stand and make Marin a leader in promoting the terrain for native animals and encouraging its lucrative tourist industry.

Thank you,



Sidney Dent

RECEIVED

2017 NOV 20 AM 10:47

What's A Park For?

POINT REYES NS

By: Mark Dowie

"Keep your nature out of my nature"

Aaron Lucich

First of all, what is a park? Zion is one, so is Yellowstone, Central, Yosemite, Gramercy, the Maasai Mara and Golden Gate Park. Then there's Fenway, Candlestick and Cominsky Parks. They're ball parks. Parks exist everywhere -- in cities, towns, suburbs and wide open spaces. Most are public but some private (Gramercy and Zuccotti). They're on every continent and serve many purposes from entertainment to human refuge, sport, wildlife and native plant protection, eco-system integrity, as well as cultural, historical and natural preservation. There are even temporary parks created for county fairs, revivals and weekend events. And there are tiny urban parklets formed in San Francisco by people who fill a parking meter with coins, lay down some sod in the parking space, set up chairs and relax until the meter runs out. Their variety is limitless, but all parks have one thing in common. They are human creations and are without exception designed and managed primarily for human use.

In their very creation parks create controversy. Some usurp private property, others displace native people. Still others turn pasture grazed by livestock into pasture for wild ungulates. Lands eyed by developers become public playgrounds, and treasured hunting grounds are turned into reserves for the hunted. So while they are ostensibly created for people, parks also piss people off. That seems to be almost unavoidable. In fact the fate of most every park is controversy.

As I traveled the planet researching my last book I was surprised to find that one of the most heated controversies surrounding rural parks around the world is agriculture and whether or not it should be allowed in any form inside a park boundary. The very sight of grazing cattle, plowed fields, silos, barns, vineyards and fishing boats inside a national park is horrifying to some nature enthusiasts, particularly those who believe that cultivated land can be stripped of agriculture, crisscrossed with asphalt roads leading to parking lots and tailored trailheads, and declared "wilderness." Ironically, many of the people who oppose agriculture in parks near their communities also treasure fresh, locally produced foods.

Most rural American national parks that are not historical monuments were created on open, uncultivated land. Some displaced true wilderness. And most of them have remained free of agriculture, although roads, trails, lodges and over 600 commercial concessions have stripped

most of them of any semblance of the wild places they once were. A few began their existence on land that had been grazed and cultivated for centuries, most notably Grand Teton, Great Smokey Mountains, Shenandoah, Apostle Islands and Cuyahoga Valley National Parks, as well as National Lakeshores in Michigan and Illinois and the Point Reyes National Seashore, which are not legally parks, but are managed as such by the U.S. National Park Service. In some of those places agriculture has been continued in some form since the park's founding. In others the cultural dynamic that created the landscape was replaced with idealized natural settings in keeping with the ideological and pastoral themes of the Park Service and its supporters. "Rewilding" is the word most frequently used to describe this process. In Cuyahoga farming was stopped altogether, the Park rewilded for a while, then farms were reestablished. But Cuyahoga is an exception which I will return to in a moment.

The creation of Shenandoah National Park provides a better example of a fairly prevalent American attitude toward the notion of farming in parks. While there were still hundreds of productive farms and plantations in Shenandoah Valley, many of which had been cultivating the land for centuries, advocates for a national park were describing the entire area as "primeval wilderness." In 1930 the State of Virginia issued a blanket condemnation of the entire area. Eminent domain was challenged by the farmers but failed, and 465 families were evicted from their land. Homes and barns were razed or burned to prevent anyone from moving back in. The National Park Service called for "a quick return to nature while cleaning up the landscape and preparing to receive visitors in large numbers." In the time it takes to seed, grow and harvest a crop, 300 square miles of diverse and prosperous farmland was taken out of production.

But not all American Parks are created equal. They are in fact remarkably different from one another, run as they are, autonomously by Park Superintendents, who display a wide diversity of attitude toward agriculture and mariculture. Some won't even consider it, while others are more open to the idea, like John Debo, former manager of Ohio's 33,000 acre Cuyahoga Valley National Park, who willingly bowed to local pressure from the pro-ag Cuyahoga Valley Countryside Conservancy and reopened deteriorating but picturesque old farms that once existed in the Park.

The Conservancy was established in 1999 as a cooperating partner with the Park, and for four years after Debo gave a green light to agriculture, focused on rehabilitating and revitalizing the old farms. To preserve the area's rural landscape, the "Countryside Initiative" invited farmers to live and farm inside the park, but only using sustainable methods appropriate for a nature reserve. Eleven rehabilitated farms were operational by 2009, and two more leases are being offered this year. Citizens of Cleveland and Akron can and do travel the short distance to the

Park to buy fresh produce, eggs, cheese, meat and wines made from restored vineyards. There are also two smaller National Lakeshores on the Great Lakes, Sleeping Bear and Indiana Dunes, that have allowed farms to remain in operation, partly for educational purposes and partly cultural. Delaware Gap National Recreation Area has 3,000 acres in strictly controlled agricultural production. And subsistence farming of bananas, breadfruit, taro and coconut is allowed on a federally managed preserve inside the National Park of American Samoa.

The Adirondack National Park is experimenting with a fascinating compromise they call “wild farming” which involves planting native pollinator corridors, building ponds, bird and bat houses, restoring riparian and wetland habitats while adopting non-lethal predator controls on local ranches, and developing cropping systems uniquely adapted to each ecosystem in the bioregion. Those practices are combined with sustainable farming. The protection of biodiversity is the ultimate goal of wild farming, as it is in most national parks. The Adirondack project covers many acres of natural land and farmland, including a once private farm now owned and operated by the Eddy Foundation.

The farm is inside a wildlife corridor called the Split Rock Wildway which connects the Park to the Lake. Most of the area is covered by forest maintained in or returning to a natural state. The rest is composed of cultivated fields of organic fruits, vegetables, grains and mushrooms. The fields are criss-crossed with hedgerows of native fruit-bearing trees and shrubs. By all indications the experiment is a huge success and could encourage other superintendents to consider similar projects elsewhere in the system, were it not for considerable public opposition to the whole idea of farming in parks.

In 1949, when Britain decided to follow America’s example and create a chain of national parks there was virtually no uncultivated land left anywhere in the kingdom. Following the Shenandoah model by kicking thousands of farmers off land that had been grazed and cultivated for centuries to create parks for weary urbanites and tourists would have caused such a national uproar that the idea was dismissed without debate. The result: Parliament passes the National Parks and Access to the Countryside Act creating fifteen rural parks in England and Wales,

In fact, in my travels I haven't found a single country with national parks that doesn't allow agriculture and mariculture in some of them. And cities throughout the world are converting ornamental plots in their public parks to fruit and vegetable production.

So what is a park really for? That remains a hard question to answer because so many of them are created around the world for so many purposes. While few if any were created to advance agriculture, many were formed to protect it. And the idea of combining food cultivation with human recreation, practiced on every continent but Antarctica, seems quite reasonable. Whatever becomes of the relationship between farming and recreation, trying them both at once, in the same place, seems like a worthwhile experiment in sustainable agriculture from which much can be learned about both farms and parks.

Evans Family Ranch

RECEIVED

2017 NOV 20 AM 11:50

POINT REYES NS

November 13, 2017

Superintendent MacLeod
Acting Superintendent
Point Reyes GMP Amendment
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Subject: First Phase Comments for the Point Reyes National Seashore General Management Plan Amendment

Dear Superintendent MacLeod,

Thank you for the opportunity to comment on the Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGRNA) General Management Plan (GMP) Amendment process and the subsequent National Environmental Policy Act (NEPA) review. The first of our Ranches, H Ranch, sits on a sharp turn in Pierce Point Road overlooking Abbott's Lagoon and the Pacific Ocean within the Point Reyes National Seashore. We are a multi-generational family who produce high quality grass-fed, pasture raised beef on the coastal pastures of the Historic H & K Ranches.

Dolores' grandparents, Domenico and Teresa Grossi first arrived in West Marin in the late 1800's, purchasing H Ranch in 1939. Alfred and Florence Grossi, Dolores' parents, operated a 400 cow dairy on the ranch until 1976, when we transitioned the ranch from milk to beef. Our rotational grazing and other conservation practices contribute to the scenic working landscape of the Point Reyes National Seashore.

As generational Point Reyes Ranchers, we are grateful for having the opportunity to continue and enhance our family's business. We have the same connection to maintaining the health and productivity of the landscape, as our parents, grandparents and great-grandparents—who cared for it before. In 2008 we developed and introduced the Rossotti Ranch brand, producing some of the finest local meat available in the San Francisco Bay Area.

We are committed to continuing our family's tradition of producing healthy food for our local community, while implementing sustainable, viable and environmentally friendly ranching practices that protects the land, water, and history of the Seashore.

Specific Comments

We offer the following specific comments for consideration and recommendations for issue identification, refinement and analysis of the alternatives during the GMP Amendment planning process and environmental review under NEPA. We will participate fully in subsequent stages and opportunities to discuss the future of the GMP for the Pt. Reyes National Seashore and Golden Gate National Recreation Area.

Alternatives:

While the Settlement Agreement identified three alternatives that were to be evaluated in the Environmental Impact Statement (EIS), it is also clear that the National Park Service (NPS) is authorized to consider a full range of alternatives that we believe must include additional options for Point Reyes. The NPS GMP notice includes three additional alternatives which we agree should be part of its review. Added to this list we urge consideration of several modifications or expansions of the existing list of alternatives referenced by NPS:

We request an expanded alternative building off the second "Continued Ranching alternative" proposed by NPS whereby NPS would allow for limited additional opportunities in farming and diversified agricultural production to complement existing ranching. Ranching and dairy farming should continue in the pastoral area on the greatest acreage possible as originally authorized. This will provide the best opportunity for each ranch to remain viable, assure the continued contribution of agricultural production in the Seashore to the local community and economy, and meet the larger goal of preserving this cultural, historic and scenic resource in the Seashore. We believe that such limited additional activities would provide multiple economic and educational benefits to the community and would strengthen the overall agricultural economy of our region. We are not proposing in this alternative expanding beyond the current 28,000 acres.

In addition, we would ask that NPS consider a lease term beyond 20 years (25-30 years) for ranches and dairy operations. Lease length is directly related to the strength and viability of farming and ranching operations. Long leases promote long-term viability of ranching operations by providing the ability to reliably forecast economic costs and returns. This includes investments in infrastructure upkeep, natural resource management, maintenance of healthy soils, water and air quality, and assurances of farm employees' welfare. Longer leases would contribute even greater confidence and stability to the entire community of ranchers, employees and park visitors.

Issues:

Diversification on the Seashore ranches and dairies should be fully considered in all analyzed alternatives so that it can be facilitated going forward. Diversification is a proven tool for the economic viability of both individual ranches and the broader community. Diversification has enabled Marin's small and medium sized farms to be economically viable, build additional resiliency, and to avert the risks of business failure. This is especially important because these ranches do not benefit from economies of scale that larger operations enjoy. In effect, diversification has strengthened Marin's local family farms, local economy, and local food system. Diversification can include selected planted or naturally occurring crops, additional livestock production, farm stands and retail sales, processing and value-added production, farm stays, farm educational tours, and expanded work with the school systems and 4-H organizations.

We ask that consideration and analysis of on farm grown and stored livestock feed of silage and hay be included in this examination. This long standing farm practice combines the benefits of critical seasonal forage production combined with effective weed management. It also reduces the need for imported supplemental feed and incentivizes effective on site resource use and ranch resiliency.

We request that the GMP and EIS review and include a plan for succession to new members of existing ranch families and alternative agricultural candidates if that option is not presented. Succession is critical for the perpetuity of agriculture's management and stewardship contributions. The Seashore has benefited from successful transition from one generation to the next through as many as five family generations. Additionally, families who choose not to

continue ranching operations, we ask for NPS to think through the issue of succession with the families of current leases, and then, if necessary, look to other parties interested in continuing ranching and agriculture at the Seashore.

Alternatives in the GMP Amendment will be stronger and have increased success in realizing the mutual benefits of working farms and ranches if they include guidelines to facilitate ranchers and NPS making real-time operational decisions. The need for regular infrastructure maintenance, repair, and replacement along with management of invasive plants are a few examples of operational decisions that often are delayed. This is the operational flexibility that the field level partnership between the ranches and staff require to be successful.

We also urge NPS to include an alternative or modify existing alternatives that would remove the free-range elk herds (Drakes Beach and Limantour-Estero) from the pastoral areas. That said, we support relocation of the herd in other areas either within or outside PRNS but outside the pastoral areas.

We support enhancing visitor experience through educational opportunities. We recommend that NPS explore the opportunity for visitors to learn about PRNS agriculture, its history, and the names and faces of the ranching families who are dedicated to achieving the synergy of a working landscape and environmental resource stewardship. The cultural, historic and scenic resources that have been preserved in the Seashore is the combination of the historic pastoral landscape and the multi-generational families that are managing them. The ranching families are the most direct link to the legacy of the historic period of ranching and farming on the Point Reyes Peninsula which dates back to the mid 1800s. The working landscapes we manage exemplify and manifest the national movement to strengthen local food systems and community supported agriculture. Visitor experience would be enhanced by providing relevant cultural, historical, and natural interpretive information, (i.e. brochures, audio tours, signage) along the boundaries of the ranch operations.

Seashore staff have previously been collaborators and partners amongst a broad group of agricultural support organizations in Marin County. We recommend that considered alternatives provide for the inclusion and enhancement of these partnerships and its ability to implement integrated farm production and environmental stewardship solutions. These partnerships have included Marin County departments such as the Agricultural Department, Community Development Agency, and Cooperative Extension. Federal agencies such as the United States Department of Agriculture Natural Resources Conservation Service and the National Organic Program are integral to this partnership. So too are community based organizations like the Agricultural Institute of Marin, Marin Agricultural Land Trust, and Marin Resource Conservation District. This partnership has provided the combined complementing missions and expertise in land use policy, agricultural and natural resource management, marketing and outreach, and education to accomplish precedent setting land conservation, environmental stewardship projects, and value-added farm production.

The GMP Amendment is an opportunity to celebrate a more than 50 year partnership, that has resulted in a working landscape with strong community ties, economy, and ecosystems. We thank you for the opportunity to provide these initial comments and we look forward to working with NPS on all subsequent stages of the GMP and EIS.

Sincerely,

Dolores Evans

Dan Evans

Julie Rossotti

Tony Rossotti

November 16, 2017

RECEIVED

2017 NOV 17 AM 11:48

POINT REYES NS

Cynthia MacLeod
Acting Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

REGARDING;

Point Reyes National Seashore General Management Plan Amendment for the 18,000 acre pastoral zone on the Point Reyes Peninsula and the 10,000 acre pastoral zone in the GGNRA. This land is currently being used for dairy and beef ranching, as well as the protection of natural resources.

INTRODUCTION

For five generations, our family has ranched the agricultural land outside the Park in Marin County. As such, we are personally involved in the preservation of the ranching community. Along with this commitment to local agriculture, we love the natural world and as such have worked for decades to enhance and preserve the environment on ranchland.

ACKNOWLEDGEMENT

The National Park Service is landlord to 20% of Marin County ranches. Along with a responsibility to protect natural resources within the pastoral zone, the Park Service has a crucial effect upon the 24 families whose stewardship predates the establishment of the Park, and who wish to continue this stewardship. This relationship is acknowledged in the enabling legislation for the Seashore. These writers appreciate the opportunity to comment on the PRNS GMP Amendment, which will guide this relationship into the future.

COMMENTS;

RECOMMENDATION TO EXTEND LEASES TO 20 YEARS, WITH ROLLING RENEWALS EVERY 5 YEARS

For ranchers to remain in the SEASHORE and the GGNRA, they must be able to run viable businesses within guidelines that protect the environment. In order to borrow money, invest in infrastructure, receive cost share conservation project monies, comply with Natural Resource Conservation Service (NRCS) requirements and Marin Resource Conservation District (MRCD) requirements, they must show a commitment to their land beyond what is now allowed in 5 year leases. Extending their leases with a reasonable renewal every 5 years or so would help them remain viable and enable them to improve the environment on their leases.

RECOMMENDATION TO CONTINUE A COLLABORATIVE PARTNERSHIP WITH LOCAL, STATE AND FEDERAL AGENCIES

The County of Marin and local agencies, such as the MRCD, U.C. Davis Agricultural Extension Office and the NRCS have long partnered with the National Park Service to improve and enhance natural resources in the pastoral zone. Given the strong interest on the part of Seashore and GGNRA ranchers, we urge you to consider expanding this relationship. With the federal budget cuts of around 13%, this assistance is practical as well as wise.

RECOMMENDATION TO ESTABLISH AN EFFECTIVE WORKING RELATIONSHIP WITH RANCHING FAMILIES

The relationship between NPS and the ranchers has improved greatly over the past several years. That said, we would recommend the adoption of a formal structure by which communication between parties would improve. This might take the form of a Council of ranchers through which issues can be discussed and solutions to current problems can be found. Involving the ranchers more in decisions which effect them, being able to benefit from their expertise and experience, having one message go out to all of them, and having a transparent process, would improve this delicate relationship, in our view.

RECOMMENDATION TO MANAGE ELK

Maintaining a biologically sound number of elk in the Seashore while minimizing forage use and property damage in the pastoral zone requires an active management plan. Such plans do exist (See the Strategic Management Plan for Elk, January 2016, Minnesota Department of Natural Resources, among others).

As ranchers of cattle in a limited area, we believe we have some understanding of the management of grazing animals. Careful attention must be paid to forage, animal damage to infrastructure and natural resources, reproduction rates, animal health, nutrition and the like. Introducing elk into the Seashore includes a responsibility to care for them. The elk are not able to leave the Seashore in order to compensate for increased numbers and decreased forage, as they would under truly wild conditions. Changes in climate necessitate a commensurate management response.

That said, culling, castrating, removing to better locations, medicating, and insuring adequate nutrition and water would all be part of a good management plan, in our view. This might include the improvement of their habitat through more active management of the land outside the pastoral zone.

Without a plan, these animals will increase beyond the ability of the Seashore to provide for them, as well as impact the ranching part of the pastoral zone negatively.

VISITOR EXPERIENCE RECOMMENDATIONS

There are many ways to improve visitor experience in the pastoral zone. Besides limiting the number of visitors at any one time in any one location to minimize environmental damage caused by these visitors, we would propose two activities; the opening up of farmhouses to farm stays and the giving of ranch tours by ranchers.

A positive way to support the cultural attributes of the Park would be to increase the opportunity for contact between the living embodiments of this cultural heritage, the ranchers, and Park visitors. Allowing the ranchers to provide lodging and visitor experiences in a controlled and protective manner (See Agricultural Farm Stay; ucanr.edu/sites/CESonomaAgOmbuds/Agricultural_Farm_Stay) would enhance visitor experience and provide education regarding environmentally beneficial food production.

Farm Tours are another way for ranchers to share their cultural heritage with visitors. Along with overnight farm stays, tours have the benefit of providing work for the next generation of ranchers.

RECOMMEND STATE OF THE ARTS FARMS AND RANCHES AS AN EDUCATIONAL OPPORTUNITY

As there are millions of visitors to the Seashore and the GGNRA each year, an opportunity exists for the demonstration of complimentary food production and environmental stewardship, as well as beneficial greenhouse gas reduction strategies. Resources put into these ranches in the way of state of the art food production, carbon sequestration, riparian restoration, methane digesters, solar energy and electric ranch vehicle and machinery use...the list goes on and on, offers a wonderful opportunity to educate the public on a green way forward.

THANK YOU!

We appreciate this opportunity to be part of the planning process for the GMP Amendment. We look forward to a positive outcome.

Respectfully,



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Mike and Sally Gale



**GMP Amendment c/o Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956**

RECEIVED
2017 NOV 20 AM 10:46
POINT REYES NS

Bob Hagen



I enjoy the peaceful tranquility of Pt. Reyes National Seashore. It is beautiful with the terrain and wildlife. However I am troubled with the cattle and all that is involved with raising them in a National Park. The fences, gates, excrement, and trampled ground are impediments that make hiking unpleasant in such a beautiful environment. I do appreciate the Tule Elk being brought back to this area. They are a natural species that belong in Pt. Reyes. I would hope that the long term management of the Park would support the Tule Elk population and eventually eliminate the cattle.

Sincerely,

Bob Hagen



November 13, 2017

Cicely A. Muldoon, Superintendent
Point Reyes National Seashore
One Bear Valley Road
Point Reyes Station, CA 94956

Re: Point Reyes National Seashore and North District of Golden Gate National Recreation Area General Management Plan Amendment

RECEIVED
2017 NOV 20 AM 10:15
POINT REYES NS

Dear Superintendent Muldoon,

My name is Dr. Stephanie Larson, and I work for the University of California Cooperative Extension. I am currently the Director of the University of California Cooperative Extension for Sonoma County and have worked with dairy producers, livestock producers, and rangeland managers in Marin and Sonoma Counties over my career. I have Bachelor's and Master's degrees in Animal Science, University of Idaho and Wyoming, respectively, and a PhD. in Rangelands Ecology and Management, Oregon State University. I provide education and research-based information to livestock producers and rangeland managers. I have lead research projects that address payments for ecosystem services that are produced from rangeland management. I am familiar with native and invasive plant and animal species which are found on rangelands in Marin and Sonoma counties and the Point Reyes National Seashore (PRNS).

Agriculture has always been an integral part of the PRNS landscapes; Native American managed these lands for the production of food, fiber and other vital resources (Anderson 2005). Ranching began at Point Reyes when Mexican land grantees introduced the first cattle to the area in the mid-1800s. Dairying soon became a dominant agricultural land use in Point Reyes and Marin County, (Livingston 1994). I have worked with beef and dairy producers at PRNS for over 30 years to provide advice, and to conduct livestock and natural resource projects designed to support, good grazing practices, environmental stewardship, and economically sound ranch management. Some projects with the PRNS beef and dairy producers include short courses on practices to maintain water quality and how to prepare Ecological Site Descriptions (ESD).

Scoping Plan Alternatives:

I have reviewed all the alternative plans that have been present by Point Reyes National Seashore and support the development an alternative that provides for more flexible use of the existing ranches and dairies based on environmental improvements. The additional alternative should provide for operational flexibility, diversification opportunities and a modest expansion of herds over the life of the permits predicated upon the adoption and implementation of forage improvement practices that expand the carrying capacity of the rangeland and successful implementation of water quality improvement and carbon sequestration practices.

Sensitive Species:

Through the 1980s and 1990s and into the early 2000s, efforts to conserve threatened and endangered (special status) species on western rangelands often meant removing livestock ranching. Research findings,



demonstration results, and failed conservation efforts in recent years involving endangered species has supported the continuation of livestock ranching and the reintroduction of grazing to some rangelands that were “protected” through grazing removal. At the landscape level, research has demonstrated that livestock ranching maintains extensive, open spaces by reducing land use conversion, fragmentation of habitat, and vegetation type conversion from invasion of brush.

Threats to native biodiversity, including special-status species, are likely to increase with removal or decrease of grazing. Research and experience have shown that grazing is strongly linked to maintaining habitat for some special-status species on PRNS lands, while they have been inconclusive for others. In all cases though, grazing has proven compatible with preservation of the special-status species found at PRNS (Table 1).

Table 1. Special status plants that occur in grazed areas at PRNS (Federally listed plant species per USNPS 2001, and California Native Plant Society plant species per Bob Soost, 2004).

<i>Federally listed as threatened or endangered</i>	
Common Name	Scientific Name
Sonoma alopecurus	<i>Alopecurus aequalis var. sonomensis</i>
Sonoma spineflower	<i>Chorizanthe valida</i>
Tiburon paintbrush	<i>Castilleja affinis ssp. neglecta</i>
Marin dwarf flax	<i>Hesperolinon congestum</i>
beach layia	<i>Layia carnosa</i>
	Tidestrom’s lupine <i>Lupinus</i>
Tidestrom’s lupine	<i>Lupinus tidestromii</i>
<i>California Native Plant Society rare</i>	
Point Reyes horkelia	<i>Horkelia marinensis</i>
Point Reyes meadowfoam	<i>Limnanthes douglasii ssp. Sulphurea</i>

Sonoma alopecurus (*Alopecurus aequalis var. sonomensis*) is found in eight naturally occurring populations in Sonoma and Marin Counties; the four sites in Marin County all occur at PRNS and are all grazed by cattle. One historic colony that was located near Bolinas disappeared following exclusion of cattle from the site (US Fish & Wildlife Service, (USFWS) 2002). The largest occurrence of Sonoma alopecurus at PRNS is on the former AT&T Ranch, which has been grazed for many decades.

Sonoma spineflower is found solely in a grazed pasture at PRNS. A master's thesis completed in 1992 on the ecology of Sonoma spineflower concluded that grazing of competitive, non-native plants had a positive influence on Sonoma spineflower survival (Davis 1992a and 1992b; USFWS 1998).

Tiburon paintbrush and Marin dwarf flax occur on serpentine grasslands, with six occurrences of Marin dwarf flax on GGNRA grazing lands. PRNS staff concluded that "Marin dwarf flax may benefit from a moderate level of cattle grazing through the reduction of taller competing vegetation as the flax is subject to shading by competing grasses or may be suppressed by buildup of thatch from previous year's herbage if left ungrazed." (USNPS 2001). Beach layia and Tidestrom's lupine are found in dune habitats and do not appear to be dependent on grazing, though many of their occurrences are within grazed pastures (USNPS 2001). Point Reyes horkelia and Point Reyes meadowfoam are also found primarily within grazed areas (Bob Soost 2004).

The relationship of grazing to some threatened and endangered species was reviewed in our U.C. Extension Report co-authored with Marin County, *The Changing Role of Agriculture at the Point Reyes National Seashore*. The report addresses Myrtle's silverspot butterfly which inhabits coastal dunes, prairie, and scrub. Habitat suitability depends on numerous factors, but two critical components are the presence of its larval host plant, the native dog violet (*Viola adunca*), and adult nectar plants including numerous native wildflowers, as well as common weeds such as bull thistle (*Cirsium vulgare*) and Italian thistle (*Carduus pycnocephalus*). Most of the Myrtle's silverspot butterflies documented at PRNS have been found in areas that are grazed either by cattle or by tule elk. Butterfly surveys done by PRNS staff in 2003 showed occurrences of Myrtle's silverspot on 13 ranches, all of which support livestock operations (Adams 2004). Recent research on Myrtle's silverspot (Adams 2004; USNPS 2007) documents that Myrtle's silverspot and cattle have co-existed for over a hundred years and that the density of the nectar sources was higher in grazed areas. Biologists studying the Myrtle's silverspot at PRNS recorded more butterflies in grazed dunes and grasslands than in ungrazed plant communities.

At time of listing the USFWS believed that cattle grazing significantly decreased the habitat quality of the Myrtle's silverspot butterfly. However, a five-year status review by USFWS found that the moderate cattle grazing regime currently used at the Pt. Reyes National Seashore did not significantly affect the distribution of Myrtle's silverspot butterfly at that site. https://ecos.fws.gov/docs/five_year_review/doc2394.pdf. Current threats to the Myrtle's silverspot butterfly include urban or industrial development of any property with suitable habitat for the butterfly, poaching, small population size, the effects of reduced host and nectar plant density due to invasive plants and forbs, road mortalities during the adult flight season, and the probable constriction of the range and distribution of this butterfly due to global climate change.

Grazing exclusions in Point Reyes National Seashore (PRNS) have resulted in extirpation of some populations of special status species from "protected sites." Rancher stewardship, "managed grazing" included development and maintenance of livestock water sources, pest management, debris clean-up, and forage improvement. Ponds developed for livestock water provide half of the available habitat for the endangered tiger salamander (*Ambystoma californiense*) in the San Francisco Bay Area. These results focus on California's annual rangeland, which is the habitat type where most of the special status species associated western rangelands are found.

In the 1996 final listing rule for the California red-legged frog the USFWS cited livestock grazing as a contributing factor in the decline of the subspecies. However, in its 2006 revised proposed rule, the USFWS acknowledged that:

"our understanding of the threats of livestock grazing and stock pond development described in the previous final listing of the subspecies has changed. Stock pond and small reservoir impoundments can

provide suitable breeding habitat for the California red-legged frog. In many areas, the presence of California red legged frogs is due solely to these small ponded habitats. For example, at the Point Reyes National Seashore in Marin County, an area where there are more than 120 breeding sites with an estimated total adult population of several thousand California red-legged frogs, the majority of the breeding sites are within stock ponds constructed on lands that have been grazed by cattle for over 150 years (Fellers and Guscio 2004). In the East Bay Regional Park District (EBRPD) lands in Contra Costa and Alameda counties, 43 of the 179 ponds surveyed (25 percent), which were exposed to grazing and were characterized as with and without emergent vegetation, supported successful breeding frog populations and often exhibited high rates of annual breeding (Bobzien et al. 2000). Ponds can silt in after being fenced off from moderate levels of grazing. EBRPD is currently removing fences and restoring ponds as California red-legged frog habitat (Bobzien pers com. 2005). We now recognize that managed livestock grazing at low to moderate levels has a neutral or beneficial effect on California red-legged frog habitat (Bobzien pers com. 2005) by keeping a mix of open water habitat and emergent vegetation). Therefore, we believe grazing helps contribute to the conservation of the California red-legged frog and its habitat.”

I am familiar with rangeland watershed issues, the protection of riparian areas, and the development of ponds and springs to distribute cattle and provide alternative water sources for wildlife. In Marin and Sonoma counties and on PRNS, ranchers have developed numerous springs and ponds to capture runoff to water their cattle. The springs and ponds help to more evenly distribute the forage consumption by cattle across a pasture. The springs and ponds also provide drinking water for many wildlife species some of which, as discussed above, are rare species that coexist or are enhanced by grazing and the development and maintenance of ponds and springs. In riparian areas such as creeks, good range management may call for fencing to prevent heavy grazing of riparian vegetation but fencing may not always be the best solution. Conversely at Yellowstone National Park, the lack of management of elk caused damaged to riparian areas. In order to managed the elk grazing, the Park introduced wolves into the ecosystem, resulting in the recovery of vegetation in riparian areas; photographs taken at a variety of locations showed considerable recovery of aspen in areas where it had become overgrazed in the years when elk were abundant (Ripple and Beschta, 2012, Ripple and Beschta, 2007). Although these riparian areas cover only a small area of the ecosystem (<2%), the park witnessed the first significant growth of aspen for over half a century. More recent data suggest that similar recoveries are being seen in cottonwoods and willows (Ripple and Beschta, 2012); this in turn has led to an increase in the abundance and diversity of riparian bird species (Hollenbeck and Ripple 2008).

Residual Dry Matter:

Residual dry matter (RDM) (Bartolome et al. 2006) is the herbaceous plant material -living or dead- left standing or on the ground at the end of the grazing season (typically considered the beginning of October, or the start of the new water year). RDM measurement is commonly used to assess the year's grazing use on annual rangeland, whether moderate, excessive or light. The recommended standards are based on the observation that the amount of RDM remaining in the fall interacts with site conditions and weather to influence rangeland vegetation species composition and forage production in the coming year.

RDM is based upon a percentage of total annual above ground production. Thus, while total recommended RDM may decline from wetter to drier rangeland types, RDM, as a percentage of total production, should actually increase on drier annual rangelands. The long-term implications of reduced RDM should be considered when adjusting RDM targets downward, as reducing RDM as a percentage of total annual production will tend to drive a downward spiral of soil degradation, reduced water-holding capacity and reduced rangeland productivity over time.

RDM standards are guidelines and it is recommended that local guides be developed for the very reason that production varies on the same mapping unit and ecological site due to differences in weather and growing

season length at a given location. Because production is so closely linked to prevailing weather other locations in the same ecological site can vary greatly in production. Thus production estimates from individual ranchers at PRNS should be used whenever possible. Monitoring of RDM can help determine these values are correct over time. Too much RDM left is also a concern; too much RDM could improve the site for annuals, such as medusahead, that flourishes under high RDM levels.

While leaving appropriate amounts of RDM can appear to represent lost grazing opportunity in any given year, consistently low levels of RDM over time can be expected to result in gradual loss of soil organic matter and soil carbon, soil water holding capacity and rangeland productivity. Insufficient soil cover, whether live or dead material, can result in a downward spiral of declining rangeland condition. In this sense, RDM can be understood as an investment in the long-term productive capacity of the land, albeit at the “cost” of current season’s total grazing capacity. Because of the limited amount of site-specific research information, however, RDM standards normally must be developed using local experience and general guidelines, particularly on perennial pastures.

Unmanaged grazing, as in a “free-ranging elk herd”, has shown to result in over grazed and under grazed areas. Ungrazed areas over time can result in a buildup of dead grass on the other side of the fence where grazing is excluded, and a thick mass of dead grass forms that prevents native plants from germinating and growing. The mass of dead grass can be overcome by invasive species such as coyote brush and Himalayan blackberry. The buildup of dead grass results in a less than healthy system, which could lead to increased erosion, reduced nutrient and water cycling and increased fire hazards.

In the General Management Planning (GMP) Amendment process, PRNS staff are being asked to:

- Work collaboratively with each respective rancher to identify RDM monitoring locations that accurately represent the landscape and managed grazing lands. Existing RDM monitoring locations have proven to be useful for other management objectives and are not located where they reflect ongoing rangeland and grazing livestock management.
- Develop RDM monitoring clear methodologies with documentation that clearly communicates how to conduct measurements, compile and analyze the data, and report the results. This will avoid confusion, and even potentially misleading use of RDM monitoring and result reporting, that does not clearly explain if specific plant species or function groups are excluded from the RDM monitoring program and the implications of that exclusion.

In my experience and in working with the ranchers at the PRNS, they are well informed about practices that can be beneficial and detrimental to wildlife, water quality, and rangeland health and they have strived to implement those practices that maintain and improve rangeland and watershed conditions. They are well aware of RDM and manage their animal to meet the required levels. Conversely, with a “free roaming” elk herd, these levels will not be met and will be detrimental to special status species in PRNS. They fully cooperate with myself at U.C. Cooperative Extension, Kristan Norman, at U.S.D.A. Natural Resource Conservation Service, along with National Park Service personnel.

The PRNS should have an alternative with elk removed from the grazing areas; especially areas in the pastoral zone that contain special status species. At the Rocky Mountain National Park, elk and vegetation management is guided by a 20-year plan that addresses the impacts of overabundant elk on vegetation. This plan’s goal is restore the natural range of variability in the elk population and affected plant communities. The plan relies on a variety of conservation tools including temporary fencing, vegetation restoration, redistribution and culling; and may use additional management tools in the future using adaptive management principles. In

1998, Point Reyes National Seashore adopted their Elk Management Plan; in that plan the Park states there will be careful monitoring of both elk and threatened and endangered species is important to ensure that the Seashore's management of elk is not harming T&E species. There has been no monitoring of the elk's impact to these species as they expand past their 1998 borders. In the Rocky Mountain National Park elk management plan, recognizing the importance of monitoring elk grazing as it can adversely affect special status species. Therefore, the elk should be removed from the pastoral zone where these special status exists currently because:

- The elk can damage the ecosystem because they're not managed
- They have plenty of grazing at Limantour and Tomales Point
- Ranchers should be the grazing stewards in the pastoral zone
- It is better for the natural resources in the pastoral zone.

Livestock producer's implement best management practices including brush control, weed, control, invasive species removal and sequestering of atmosphere carbon in rangelands soils. The results of livestock grazing should be measured by resource goals; goals that include residual dry matter, plant diversity, plant density and species competition. Livestock producer know best the stock density and rate to meet resource goals; and grazing animal numbers should not be limited by arbitrarily pre-set maximum animal numbers.

PRNS pastoral zone lands provide a direct link between urban consumers and local food producers, a powerful conduit for educating the public about the importance of local food production and security. Sonoma and Marin Counties are perfect models for demonstrating how preserving family farms, contribute to social, economic and ecological sustainability at local, regional and even national levels. Ranching and farming have positive health impacts including increased food access and food security, food to local business and schools, improved health literacy and general well-being. Ranching in Sonoma and Marin Counties, including PRNS, albeit smaller scale, remains a local industry which provides job creation, training and business succession, and market expansion for many other ranchers and farmers.

Ranchers should be allowed and encouraged by the Point Reyes National Seashore to allow continued and diversified ranching activities to include small scale historic plant and animal production because it more properly represents the important historic period (1860-1960) that the Park is entrusted to protect. There will be an increase in sustainability because:

- It will add interest for the next generation of livestock producers
- Connects the producers to the local food system
- Expands the cow monoculture; making it more interesting, educational and historically accurate.

Sincerely,



Stephanie Larson, PhD
UC Cooperative Extension
Livestock & Range Management Farm Advisor
Certified Rangeland Manager #73

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RECEIVED
2017 NOV 20 AM 11:49
POINT REYES NS

November 20, 2017

Superintendent Cynthia MacLeod
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, California 94956

Dear Superintendent:

The Point Reyes Seashore Ranchers Association (PRSRA), on behalf of all of its members, and the undersigned individuals appreciate the opportunity to comment on the Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGRNA), (collectively the "Seashore"), General Management Plan (GMP) Amendment process and the subsequent National Environmental Policy Act (NEPA) review. We understand this to be the first of several scoping and issue identification steps as part of the GMP and NEPA processes.

The GMP Amendment is the foundation for providing the cultural resource, natural resource, and economic benefits envisioned by Congress when it established and preserved these magnificent areas and provided for continued ranching and dairying in the Pastoral Zone. The Association and the undersigned individuals are honored and grateful to be part of this longstanding history and we take great pride in continuing to ensure that ranching and dairying contribute to the agricultural heritage of Marin County and promote the environmental and scenic quality of the working landscapes of the Seashore. Accordingly, we offer the following high-level comments for consideration during this public comment period and we will participate fully in subsequent stages and opportunities to discuss the future of the GMP for the Point Reyes National Seashore and Golden Gate National Recreation Area. *

I. Purpose and Need

We believe it is prudent for NPS to include early on a section on Purpose and Need as a framework establishing the long-term management of the 28,000 acre Pastoral Zone. This comprehensive direction should include the overall goals for sustainable dairy and beef ranching in the Seashore with terms of at least 20 years.

* We note the expedited way this GMP/EIS process is proceeding with an unusually short notice given to interested parties to provide initial comments on the GMP alternatives and key issues. NPS initially set a very tight deadline of 20 days from its open houses (and only 30 days from the initial request for comments) for the public to digest a voluminous administrative history and complicated Settlement Agreement. Then a one-week extension was provided. While we support NPS moving forward with due deliberation, we reserve the right to provide further comments on the scoping alternatives, major issues, and provide key information as the GMP and EIS are developed.

Ranching has a long and important history on the Point Reyes peninsula and adjacent National Park Service lands. These working ranches are a vibrant part of the culture of the Point Reyes National Seashore and represent an important contribution to the superlative natural and scenic resources of these NPS lands. Protection of these diverse and unique resources is an important responsibility shared by the NPS and Seashore ranchers within the Pastoral Zone.

A comprehensive management plan is needed:

- To articulate a clear vision for ranching on existing ranch lands in the Pastoral Zone administered by Point Reyes National Seashore.
- To allow for issuance of leases with terms of at least 20 years to provide for maintenance and improvement of ranching infrastructure, the working landscape, and the associated environment.
- To address concerns related to tule elk impacts on the environment and working ranches.
- To provide clear guidance and streamline processes for Seashore and regulatory review of proposed ranching activities, including best management practices that promote protection of Seashore resources.

II. Alternatives

While the Settlement Agreement identified three alternatives that were to be evaluated in the Environmental Impact Statement (EIS), it is also clear that the National Park Service (NPS) is authorized to consider a full range of alternatives that we believe must include additional options for Point Reyes. The NPS GMP notice includes three additional alternatives which we agree should be part of its review. Added to this list we urge consideration of several modifications or expansions of the existing list of alternatives referenced by NPS:

We envision a somewhat expanded alternative building off the second “Continued Ranching Alternative” proposed by NPS whereby NPS would allow for limited additional opportunities in farming and diversified agricultural production to complement existing ranching and dairy activities. We believe that such limited additional uses would provide multiple economic and educational benefits to the community and would strengthen the overall agricultural economy of our region. We are not proposing in this alternative expanding beyond the current 28,000 acre Pastoral Zone. In addition, in this alternative, we would ask that NPS consider a somewhat longer lease term (25-30 years) for ranches and dairies to facilitate investments in our agricultural infrastructure that will make us more productive, efficient, and protective of the environment. The added term can help us amortize such measures in a sustainable, long term fashion.

An additional modification to this Continued Ranching Alternative would be consideration of forage improvement practices which could result in modest additions to existing herds and dairy farms consistent with water quality improvements and carbon sequestration practices.

We also ask NPS to include an alternative or modify existing alternatives that would remove the free-range elk herds (Drakes Beach and Limantour) from the Pastoral Zone. This would provide the best solution for eliminating ongoing, documented conflicts that occur to historic, ranching, and cultural resources. The 1998 Elk Management Plan provides for this and the nearly 20 years of mixed and frustrating results in implementing alternative practices to reduce conflicts in forage use and infrastructure upkeep demonstrate why this alternative has merit. The scoping notice description of alternatives is misleading in that it presumes today’s extent of the elk herds is currently approved in the existing GMP. That said, we support continuation of the herd in other areas within PRNS but outside the pastoral areas.

Finally, we suggest that the "Reduced Ranching" alternative contains no justifiable rationale for its proposed reductions and should be amended to reduce ranching only where there is an arguably justifiable reason. No such reason is apparent in this initial description of the alternative.

III. Issues

A. Economic analysis

Reducing or eliminating ranching and dairies from Point Reyes would have profound adverse economic consequences for the local and regional economy. These family ranches are essential to many local and regional businesses and represent an important cultural and economic way of life that extends beyond the Seashore. The ranches are a critical part of that cultural mosaic of estuaries, lagoons, ridges, hillsides, forests, and beautiful grasslands that make up the overall environment which in turn attract thousands of visitors every year. Without the stewardship of the ranching community, much of this landscape would not be there today. The GMP and EIS must assess these positive and important economic benefits not only to the ranching and dairy families but to the broader region as a whole.

Local employment, changes to demographics, and local community well-being must be considered. Even our local school system is heavily dependent upon the enrollment of students from ranching families.

B. Diversification

The GMP/EIS process should evaluate a variety of additional agricultural and related activities that could help to strengthen the area's economy, build on its tourism base, and bring high quality educational programs to the area. These complementary uses add to the sustainability of the ranches and ranching families while enhancing visitor experiences.

Diversification can include selected planted or naturally occurring crops, additional livestock production, farm stands and retail sales, processing and value-added production, farm stays, farm educational tours, expanded work with the school systems and 4-H organizations. Think of the community benefits that would come from a comprehensive NPS educational/tourism program celebrating the cultural history of the area and its contribution to ranching and agriculture.

Consideration of on farm grown and stored livestock feed of silage and hay should be included in this examination. This long-standing farming practice combines the benefits of critical seasonal forage production with effective weed management, balanced herd nutrition and distribution management. It also reduces the need for imported supplemental feed and incentivizes effective on-site resource use and ranch resiliency.

C. Succession

We encourage the GMP and EIS to review the all-important issue of succession to current and future leases. One overall goal of NPS should be to ensure that current families continue their stewardship of existing ranch and dairy lands, and provide a continuity of ownership going forward. But in the event that families choose not to continue ranching and dairies, how best can NPS continue agricultural operations on the affected land? The key operative is to continue this rich heritage and the environmental stewardship that accompanies it. Thinking through the issue of succession with the families of current lessees, and then, if necessary (because those families can no longer continue

ranching), looking to other parties interested in continuing ranching and agriculture at the Seashore should be a component of the GMP.

Within this framework, we know the past experience and judgment of existing ranching families will provide important guidance to NPS.

D. Environmental Stewardship and Best Management Practices

The Association and the individual ranching families support implementation of best management practices (BMP) for ranching, dairy, and other agriculture activities. The GMP and accompanying EIS should evaluate these BMPs to insure their applicability, practicality, and success in protecting the environment and insuring economic viability...all of which is consistent with federal, state, and local requirements. As we have done frequently in the past, the ranching community is prepared to step forward to assist with important environmental projects ranging from preserving threatened species to improving water quality. We continue to be willing participants in considering, where feasible and necessary, other environmental measures that may add to the success of BMPs in protecting the natural values of the Seashore.

With respect to methane and climate change, we believe the GMP/EIS should address how local ranches and dairies may play an important role in mitigating such impacts, potentially through carbon offsets and other payments for environmental services. Marin County and the State of California are leaders in this area and we welcome the opportunity to work with them as part of this effort. We also believe that a variety of public and private partners may provide important technical and financial resources to assist in this effort. NPS and the ranching community at the Seashore can develop state-of-art approaches and serve as a model for programs elsewhere.

E. Operational Flexibility

Regular infrastructure maintenance and repair at the Seashore has often been delayed for extended periods of time in part because guidelines are unclear or nonexistent. The GMP should contain more specific guidelines so critical work can be efficiently authorized by NPS in the future. In the coming months while the GMP progresses, we would welcome a working group to develop appropriate guidelines to assist the agency in more efficient and timely decision-making and allow effective management of weeds, fire fuels, protect water quality, livestock watering and distribution, and other field and ranch level concerns.

F. Tule Elk

While we support manageable populations of tule elk at Tomales Point and the Limantour Wilderness, we strongly urge NPS to adopt a GMP amendment that provides all the necessary tools to prevent elk from occupying the pastoral areas within the Seashore and insure that overpopulation of tule elk will not occur. Conflicts caused by the elk with existing ranches and dairies are well documented as is the spread of disease and associated environmental impacts. NPS has correctly expressed its concern about the difficulty and expense of managing tule elk outside the Tomales Point and Limantour Wilderness areas and explained that "The 1998 Tule Elk Management Plan/EA did not contemplate the expansion of tule elk into the pastoral lands." The GMP amendment should provide for removal of tule elk outside of Tomales Point and Limantour areas by using all effective means including full cooperation with the California Department of Fish and Wildlife.

G. Leases

To ensure consistency and facilitate clear understanding of forthcoming requirements and operational issues, it would be helpful for the GMP and EIS to contain a draft lease template. We urge NPS to meet with PRSRA and individual ranchers to discuss past leasehold provisions and where new approaches can be adopted to reflect important on-the-ground considerations.

We thank you for the opportunity to provide these initial comments and we look forward to working with NPS on all subsequent stages of the GMP and EIS.

Sincerely,

Kevin Lunny G Ranch
On behalf of PRSRA
Kevin Lunny, President

James J. Keh J Ranch

Michael Kehwe "

Tom Kehwe "

Julie Evans Rossotti H&K

Paul J. Melton I Ranch

Robert Evans H Ranch

Dan Evans H Ranch

Eric [unclear] C Ranch

Fred Rogers 10184

Jimmy Rogers 10184

Howard [unclear] Nim

Jim Jones

A

W. W.

Mc

Richard & Maloney

F

Ed Littleberry

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Patricia

Ann L

Ro



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Linda Mendoza L R

Joseph A. Lunny G

Joan M. Lunny G R

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Rene Leucher

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Betty Nunes

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Jackie Nunes Demelt

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Robert McClure

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Joacqueline Grossi

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Phil Grossi

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Angie Hummer

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Margaret Lamm

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Peter J. Martinelli
Paradise Valley Ranch
Bollinas, Ca.

RECEIVED
2017 NOV 16 AM 5: 27
POINT REYES NS

November 10, 2017

Cynthia MacLeod
Acting Superintendent
Point Reyes GMP Amendment
Point Reyes National Seashore
1 Bear Valley Rd.
Point Reyes Station, Ca. 94956

Dear Superintendent MacLeod;

As a direct neighbor of the Seashore and ardent advocate for the future of agriculture in Marin County, I very much appreciate the opportunity to offer comments in the General Management Plan update process. I have operated a 25 acre organic crop farm on my family's ranch along Pine Gulch Creek for over 20 years. I am a former board member of the Marin Agricultural Land Trust, current board member of the Marin Resource Conservation District and the Marin County Farm Bureau. I am also a board member of the Wild Farm Alliance, a national organization that seeks to balance the needs of agriculture and wildlife on working lands.

For over 15 years two neighboring farmers and I worked collaboratively with PRNS staff to design and implement the Pine Gulch Watershed Enhancement Project, a model of water management in California. This project has insured the future viability of our farms, while improving instream habitat for endangered coho salmon and steelhead trout. In this spirit of the Park Service and farmers working together for the benefit of wildlife and agriculture, I offer the following comments in support of continuing the tradition of ranching in the Pt. Reyes National Seashore.

I would like to first respond to the question the NPS posed in its letter to Interested Parties that asks, "What types of specific strategies can/should be considered for managing agricultural leases/permits":

Leases and Management:

The leasing policy for PRNS ranches should be applied equally among all lease holders and not continue as a piecemeal process, leaving some landowners dangling on a year to year basis, while others hold leases that run through a rancher's lifetime. Short term leases put Seashore ranchers at a tremendous disadvantage when applying for farm loans and farm credit. To remain viable, Seashore ranches must have the access to credit that their competitors enjoy.

Twenty - year leases with an automatic five year roll-over would greatly incentivize leaseholders to properly maintain ranch infrastructure and historic structures. Long term leases would also incline ranchers to invest in long term practices such as regularly applying compost and cover crops to improve soil quality and sequester carbon in the soil. Such practices prevent erosion and improve water quality over time, ultimately benefiting natural resources and wildlife.

In a broader sense I encourage the PRNS to adopt the pro-active approach to agriculture as demonstrated by the Cuyahoga National Park in Ohio where agricultural leaseholders have been fully embraced as part of the ethos and experience of that NPS unit. The leases are up to 60 years (From Darwin Kelsey – founder and E.D. of the Countryside Initiative). Rather than NPS staff having to navigate the intricacies of agricultural management, Cuyahoga Park established the Countryside Initiative Program to manage the farms. This successful program is interactive, allowing the public to experience the farms, purchase farm products and learn about the agrarian history within the park.

Currently it seems that the ranches in Pt. Reyes are more or less tolerated as a holdover from a bygone era, rather than embraced and celebrated as the farms in Cuyahoga are. Transitioning to such a management model would benefit both ranchers and PRNS. Strong support of ranching in PRNS will also further the vital role (20 percent of active farmland) that the Seashore ranches play in the agricultural economy of Marin County.

I strongly encourage PRNS to better understand and further embrace the management benefit of having ranchers operate in the Pastoral Zone. My family's ranch, Paradise Valley Ranch, is surrounded by defunct ranches, acquired by the Park Service in the 1970s and designated wilderness. These tracts – the former RCA (above Mesa Rd.), Palomarin, Texeira, and Rancho Las Baulines (ranching ended 1999), have evolved into *out of control sources of invasive weeds*. Star thistle, Scotch broom, eucalyptus and others, are freely propagating on these properties and polluting the Bolinas Lagoon watershed with seed. New patches are popping up annually on PRNS land, County of Marin lands, and private lands.

On our property we must constantly manage the annual influx of invasive seed stock from these abandoned/unmanaged PRNS ranches. This problem impacts the entire watershed from Dogtown to Bolinas Lagoon, the Southern reach of Inverness Ridge and the steppes of Bolinas Ridge. If ranching were retained on these tracts, we would not have this exploding weed problem. Based upon this past experience, I am confident that any reduction of ranching on the Pt. Reyes Peninsula and Bolinas Peninsula would have the same damaging effect of an invasive weed explosion. In a nutshell, I encourage PRNS to embrace ranchers as partners in managing the land and its resources.

A deepening embrace and broadening support of ranching in the PRNS would foster more collaboration with the agencies that implement improvements on rangeland that benefit wildlife and protect natural resources. I am speaking of the RCD - Marin Resource Conservation District (See their letter), and the USDA Equip program. As an RCD board member, I can attest to our work which involves controlling invasive weeds, correcting erosion issues, fencing livestock out of creeks/wetlands, and improving water access to evenly spread livestock around pasture land. In a time of NPS budget shortfalls, these agencies can provide services and funding for projects that benefit the PRNS ranchers and natural resources.

Beyond The Six Alternatives:

The ranches in the PRNS should not be viewed one dimensionally as historic artifacts stuck in 20th century agriculture. They need to be able to operate and thrive in the 21st century agricultural economy. While there is great fear around diversification on the part of environment advocates, in reality diversification is the leading edge of the sustainable agriculture movement. Properly managed, rotated animal and crop agriculture that mimic natural processes

are much more symbiotic with surrounding eco systems than mono cultures. Creating a closed circuit of nutrient cycling on a ranch or farm, such as permitting chickens on cattle pastures or rotating row crops plots with pastures, is proven to be beneficial to soil health. While grazing is the historic and naturally suited activity for PRNS ranches, diversification options should always be available for ranch operators to implement in the right circumstances that account for access to water, slope, and sensitive habitat areas. While there is a fear of rampant row cropping, in reality appropriate row crop areas in PRNS are limited.

The PRNS should go beyond the suggested alternatives and consider re-establishing ranches around the village of Bolinas. The old idea that former ranch lands will naturally revert to wilderness is nonsense. Most of these former lands become enormous weed patches. A revival of restorative, organic ranching is far superior to letting old ranch land go unmanaged. Besides the invasive weed issue from 40 years of non-management, the proliferation of brush and fuels on these former grazing lands present an enormous fire threat to the Bolinas Peninsula and Dogtown. If the former RCA ranch (above Mesa Rd.), Texiera, and Rancho las Baulines were returned to grazing the weed and fire issues could be properly addressed, saving the Park Service management costs and providing the residents of Bolinas a measure of protection from wildfires.

The issue of tule elk roaming on to ranch land is a much larger, unaddressed issue that has been allowed to spill into this GMP - ranching process. Re introducing a high impact, large herbivore into a dis functional eco system, void of bears and wolves, etc. is asking for trouble. The over population of elk and unfortunate die-off two years ago are evidence enough of this overarching problem. It is unfair for the PRNS to allow the mismanagement of the elk herd become a driving influence in this GMP process. Tule elk in other areas of California are managed properly by California Fish and Wildlife. Besides removing the elk from the designated pastoral zone, PRNS should consider allowing Ca. Fish and Wildlife to assume management, or implement some of their successful management tools, such as special hunts that generate revenue. Grizzly bears and wolves are not a viable option in our region.

Superintendent McLeod, I very much appreciate the consideration of my comments. I look forward to continuing to participate in the GMP process.

Sincerely,



Peter J. Martinelli

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McDonald Lucchesi Cattle

2017 NOV 20 AM 10:45

POINT REYES NS

November 17, 2017

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Superintendent MacLeod,

Concerning the alternative: "Reduced Ranching and Management of the Drakes Beach Tule Elk Herd"

It is our strong opinion that both the Drakes Beach elk herd and the Limantour elk herd must be put back into the wilderness where the 1998 Tule Elk Management plan intended for them to be.

The problems caused by elk with existing ranches is well documented – disease, damaged fences, consumption of grasses, etc.

Also this alternative should not cease ranching just for the sake of eliminating ranches because there are no building on them. We recommend fencing out the actual sensitive areas. The fenced out sensitive areas would be removed from the leases and considered reduced ranching.

We are 5 generation ranchers in Marin County. We are currently 3 generations ranching in PRNS. Our matriarch is 94 years old and is still active in all ranching decisions.

We have leased the N Ranch for 50 years and have leased the Home Ranch for 14 years.

Our family has already been displaced by NPS. In 1980 we were kicked off Pierce Point Ranch for the elk preserve. That move split up our family business because there were no ranches big enough for our business available. Now, in 2017 the N Ranch is slated as one of the ranches to cease operations. So here we go again – a possibility of splitting up the family business again!

The Home Ranch and the N Ranch border each other and are managed as one business. Eliminating the N Ranch would severely disrupt our working ranch plan.

The N Ranch is one of the most productive ranches on the point. It is one of the only ranches in PRNS that does not require supplement hay to be fed. Taking this ranch out of production would cause the vegetation to flourish and become under grazed, not to mention the economic impacts it would be for Marin County.

Thank you for considering these comments.

Sincerely,

A large rectangular area of the document is redacted with a solid grey fill, obscuring the signature and any text that might have been present below the word "Sincerely,".

2/10

11/12/17

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Superintendent MacLeod,

It looks like the park service has forgotten about the problems it had with the exotic deer in the park in the past.

Dr. Ottinger turned about 12 Axis and Fallow deer loose in his ranch years before he sold it to the park. Those deer multiplied to several hundred and scattered over most of the ranches that are now parkland. The park tried to shoot some and give the meat away. That did not last long, so they quit shooting them.

The deer now were at the park headquarter and became a nuisance so they hired expert shooters and a helicopter and shot all the exotic deer they could find.

Now it looks like history is repeating itself. The elk are using the same area the deer had except the elk are more destructive. Some of the elk have tested positive for Johnne's disease (a deadly intestine disease with no cure). No one seems to want to take the surplus elk from Tomales Point on account of this disease, so the park turned some Tomales point elk in to the wilderness. The elk are going in to the pastoral zone in the park and competing with cattle. Next they will be at Park Headquarters. They are much more destructive than the deer so the park will have to do the same with the elk as they did with the deer.

I was a tenant rancher on the Pierce Point Ranch in 1980 when the first elk were brought to the park. Ray Arnett (Fish and Game) would not give them to the park until a fence was build to keep the elk from the pastoral zone as he was sure cattle and elk don't work together.

Cattle have to be controlled by fences and managed. Elk will jump the fence or beak through it.

Our cattle are moved from pasture to pasture as the grass grows. As soon as new pasture growth comes, the elk break in and eat all the new growth. Come time to rotate cattle back to the new grass, it is all gone because the elk ate it all.

The only way to manage elk is to build an elk fence. Put the elk back in the wilderness and out of the pastoral zone like was done in the past and let the ranchers grow food for the public.

Sincerely,



Merv McDonald
50 years raising cattle in Point Reyes National Seashore

Comment Form

Park: Point Reyes National Seashore

Project: Point Reyes National Seashore and North District Golden Gate National Recreation Area General Management Plan Amendment and Environmental Impact Statement (ID: 74313)

Document: 2017-10 General Management Plan Amendment Newsletter (ID: 83408)

City: Oakland

State/Province: CA

Postal Code: 94612

First Name: Jeff

Middle Initial:

Last Name: Miller

Organization: Center for Biological Diversity

Member Official Representative

Address 1: 1212 Broadway, Suite 800, Oakland, CA 94612

Address 2:

Country: U.S.

E-mail: jmiller@biologicaldiversity.org

Comments or Requests: attached

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2017 NOV 20 AM 10:16
POINT REYES NS



November 13, 2017

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Re: Scoping Comments on GMP Amendment for Point Reyes National Seashore and GGNRA Lease Areas

The Center for Biological Diversity submits these scoping comments on the General Management Plan (GMP) amendment for lease lands at Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). The Center is a nonprofit conservation organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has more than 1.5 million members and supporters, including 216,000 in California and 3,800 in Marin County. The Center has worked to protect native wildlife and their habitats and other environmental resources of the Bay Area for more than two decades.

The Center has identified the following issues and questions which should be addressed by the National Park Service in the upcoming Environmental Impact Statement (EIS) for the GMP amendment. The Park Service should analyze existing data and information as well as conduct studies needed to inform the public of the full environmental impacts of agricultural leases and elk management strategies. The Park Service must determine which management alternatives and actions provide maximum protection, restoration, and preservation of the natural environment, and which are the environmentally superior alternative(s).

Purpose, Need and Structure of GMP Amendment

The scoping notice does not explicitly state a purpose and need for the GMP amendment and EIS, which makes it difficult for the public to adequately provide scoping comments. The notice states that the GMP amendment “will update guidance for the preservation of natural and cultural resources, the management of infrastructure and visitor use in the planning area, and as appropriate, direct specific strategies for managing agricultural lease/permits and tule elk for lands in the planning area.” This assertion, if representative of the purpose and need, fails to explain that a GMP is defined under Park Service policies as:

“a broad umbrella document that sets the long-term goals for the park based on the foundation statement. The general management plan: (1) clearly defines the desired natural and cultural resource conditions to be achieved and maintained over time; (2) clearly defines the necessary conditions for visitors to understand, enjoy, and appreciate the park’s significant resources; (3) identifies the kinds and levels of management activities, visitor use, and development that are appropriate for maintaining the desired conditions; and (4) identifies indicators

and standards for maintaining the desired conditions.” (2006 NPS Management Policies at 2.2)

Further, the defined purpose of a general management plan is to “ensure that the park has a clearly defined direction for resource preservation and visitor use.” (2006 NPS Management Policies at 2.3.1)

The Park Service must follow its policies that describe how the planning process should occur and what must be involved, which include:

“This basic foundation for decision-making will be developed by an interdisciplinary team, in consultation with relevant NPS offices, other federal and state agencies, local and tribal governments, other interested parties, and the general public. The management plans will be based on full and proper use of scientific and scholarly information related to existing and potential resource conditions, visitor experiences, environmental impacts, and relative costs of alternative courses of action.”

“The approved plan will create a realistic vision for the future, setting a direction for the park that takes into consideration the environmental and financial impact of proposed facilities and programs and ensures that the final plan is achievable and sustainable. The plan will take the long view, which may project many years into the future, when dealing with the time frames of natural and cultural processes. The first phase of general management planning will be the development of the foundation statement. The plan will consider the park in its full ecological, scenic, and cultural contexts as a unit of the national park system and as part of a surrounding region. The general management plan will also establish a common management direction for all park divisions and districts. This integration will help avoid inadvertently creating new problems in one area while attempting to solve problems in another.” (2006 NPS Management Policies at 2.3.1)

“Each park’s approved general management plan will include a map that delineates management zones or districts that correspond to a description of the desired resource and visitor experience conditions for each area of the park. Management zoning will outline the criteria for (or describe the kind of) appropriate uses and facilities necessary to support these desired conditions. For example, highly sensitive natural areas might tolerate little, if any, visitor use, while other areas might accommodate much higher levels of use. Even in historic structures, one floor might be most appropriate for exhibits, while another could accommodate offices or administrative uses. Some desired conditions may apply parkwide, but the delineation of management zones will illustrate where there are differences in intended resource conditions, visitor experiences, and management activities.” (2006 NPS Management Policies at 2.3.1.2)

Park Service policies explain that a GMP “is the most appropriate context for developing or reviewing a foundation statement because of the comprehensive public involvement and NEPA analysis.” (NPS 2006 Management Policies at 2.2) The Park Service must formulate a foundational statement for the ranching lease areas as part of the GMP amendment.

Park Purposes

Discuss the ways and degree to which ranching leases and ranching activities and operations are in conflict with or support maximum protection, restoration, and preservation of the natural environment at PRNS and GGNRA.

Discuss the ways and degree to which ranching leases conflict with public recreation and public benefit at PRNS and GGNRA.

Discuss the ways and degree to which ranching leases and activities fail to conserve and provide for public enjoyment of the scenery, natural and historic objects, and wildlife of the PRNS and GGNRA lease areas.

Discuss the ways and degree to which ranching leases fail to leave natural resources at PRNS and GGNRA unimpaired for the enjoyment of future generations.

Discuss the ways and degree to which ranching leases and activities promote or conflict with recreational, educational, historical preservation, interpretation and scientific research opportunities at PRNS and GGNRA.

“Impairment” is defined as “harm to the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.” How has the Park Service determined which uses and activities within the ranching lease areas will not impair park values or resources? What information was used to determine that ranching activities will not cause impairment or unacceptable impacts?

For activities and uses within the ranch lease areas which have been determined not to impair natural values, how do such uses and activities fulfill the fundamental purpose of the National Park System, which is “to conserve park resources and values” and provide “for the enjoyment of park resources and values by the people of the United States”?

Discuss the legislative history of the Point Reyes Act, and whether the Act supports continuing or ending ranching, and under what circumstances.

Proposed Alternatives

No Ranching Alternative

The scoping notice states that a “No Ranching” alternative would consider continuing to allow prescriptive grazing in “high priority areas” to maintain native and rare plant communities. Describe the science that supports such grazing as beneficial for native and rare plant communities. Describe the science that determines what levels and practices of cattle grazing are compatible with or conflict with maintaining these native and rare plant communities.

Reduced Ranching Alternative

In a reduced ranching alternative, the Park Service should not choose ranching operations to eliminate based on the economic impact to private leaseholders and commercial facilities. Rather, the Park Service must be guided by its management policies to prevent impairment of natural resources and wildlife, by eliminating the most environmentally harmful ranches and ranching activities.

In a reduced ranching alternative, the Park Service should also analyze ranch leases for closure based on the lease-holder's history of non-compliance with lease conditions, problems with overgrazing, the presence of threatened/sensitive species, the presence of tule elk, conflicts with recreational access, water pollution, impact on wilderness areas, and other environmental factors.

Discuss the 2008 draft GMP for PRNS which considering closing the ranches that drain to Drakes Estero, and the rationale for proposing to close these ranches.

No Dairy Alternative

The scoping notice suggests that the No Dairy alternative could consist of switching current dairy operations to beef cattle grazing. Discuss what the impacts would be in terms of reduction or increase in AUMs, RDMs and forage from switching from dairy to beef cattle. Discuss why if dairy ranches are eliminated, those lands should not be retired from all grazing, to give lease lands that suffer from cattle overuse and concentration and need time to heal. Discuss the environmental and public benefits from retiring dairy operations and giving lease lands over to public use and wildlife habitat, rather than beef cattle grazing.

Continued Ranching and Management of the Drakes Beach Tule Elk Herd w/ 20-Year Permits Alternative

There is serious concern that the Park Service has this alternative listed as an "initial proposal," which suggests the agency may have already improperly identified it as a preferred alternative, which would foreclose a robust and fair consideration of alternatives.

Alternative with Removal of Drakes Beach Elk Herd

Discuss the futility of attempting to remove tule elk from the Drakes Beach and ranch lease areas through translocation to other areas of the park. Discuss Park Service research showing that translocated elk returned to the Drakes herd and the fact that elk can easily swim across Drakes Estero. Discuss the origin of the Drakes Beach herd from the Limantour herd and the likelihood that elk will or will not stay out of ranch lease areas. Discuss the annual expenditure of taxpayer dollars from Park Service employees moving and hazing elk from the ranch lease areas.

Continue Current Management Alternative

Continuing current management is not the "no action" alternative. A true no action alternative would let existing grazing leases expire and take no further action.

Issues Common to All Ranching Alternatives

How did the Park Service create the arbitrary number of acres to remove from ranching or include as "resource protection buffers"? It is impossible for the public to comment on these alternatives without some understanding of how these numbers were reached.

Why are "maximum population thresholds" needed for the Drakes Beach elk herd? Are these thresholds to benefit private lease holders, or is there some ecological justification for limiting the size of the elk herd?

The Park Service is proposing to establish "broad management strategies" for ranches, but the agency should also identify site-specific practices to fully consider unique resources and ranching impacts in each lease area.

Types of Authorizations (10 v. 20 year)

Most federal lands grazing permits, such as on U.S. BLM and U.S. Forest Service lands, are limited to 10 year leases. The 20-year lease directive issued by former Interior Secretary was arbitrary, illegal due to lack of NEPA compliance, and is inconsistent with NPS policies on ranching.

Annual grazing lease authorizations are needed for the Park Service to be able to control and manage cattle herd numbers and AUMs, and to include and modify Best Management Practices to respond to resource concerns such as drought, overgrazing, conflicts with wildlife, and public recreation needs.

Elk Management

Discuss the carrying capacity of the entire PRNS and GGNRA for tule elk and whether the current elk population is anywhere near that capacity.

Evaluate the potential for rebuilding large elk herds at PRNS and the benefits such herds would provide for the genetic diversity and long term persistence of the species.

Explain the scientific and ecological basis (not the economic basis to benefit ranchers) for managing tule elk in a national park using lethal methods, hazing, or sterilization.

Explain the scientific basis for fencing free-ranging elk populations on public land.

Explain the rationale for managing the pastoral zone for the exclusive use of private commercial cattle operations and excluding or removing native wildlife.

Discuss why the fenced elk herd in the Tomales Point Elk Preserve declined 47% during the drought years from 2012-2014, while the free-roaming elk herds at Limantour and Drakes Beach increased by 28% and 39%, respectively, during the same period.

Explain the consequences of continuing to keep the Tomales Point herd fenced or fencing out the Drakes Beach herd rather than allowing elk to move freely to find water and food.

Assess leaseholder claims about elk impacts, including: to what extent elk actually eat livestock forage; the potential damage from elk rubbing their antlers on agricultural equipment; and the possibility that elk have "stabbed cattle to death with their antlers."

Endangered Species

Identify and map all habitats for wildlife and plants listed under the federal and state Endangered Species Acts as endangered, threatened or a species of special concern, as well as protective buffers needed to maintain ecological function for their suitable habitat.

Identify all designated critical habitat for federally listed species at PRNS and GGNRA and where ranching leases overlap or runoff drains into critical habitat.

Identify where ranching and dairying activities overlap with habitat for state listed species.

Discuss which ranching and dairying activities and uses within the ranch leases areas conflict with or support providing maximum protection for sensitive species or their critical habitat.

Discuss which ranching and dairying activities and uses within the ranch leases areas are compatible with or conflict with protection and recovery of federally listed species.

Discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on designated critical habitat for any federally listed species.

Discuss what limitations or mitigation measures are needed for ranching activities that conflict with protection of listed species.

Identify where removal of important habitat areas from the designated pastoral zone is needed to protect listed species.

Identify where exclusionary fencing is needed to protect sensitive habitats for listed species from livestock.

Identify where reduced stocking levels of livestock in overgrazed areas is needed to protect listed species.

Identify where a prohibition on silage and mowing is needed to protect sensitive species.

Identify where removal and control of invasive species is needed to protect sensitive species.

Salmon and Steelhead

Identify any potentially significant impacts (under NEPA) from ranching activities on Central California Coast coho salmon, California Coastal Chinook salmon, or salmon habitat.

Identify any potentially significant impacts (under NEPA) from ranching activities on Central California Coast steelhead trout or trout habitat.

Identify any continuing or unresolved ranching impacts on salmonid habitat in Olema Creek and tributaries, Lagunitas Creek and tributaries, and tributaries of Drakes Estero.

Identify what salmonid protection measures from the 2004 NMFS Biological Opinion for salmonids have not been implemented.

Identify which stream reaches with livestock grazing do not have 15 to 30 meter riparian buffers.

Discuss the results of salmonid habitat and riparian monitoring, as required by the 2004 NMFS Biological Opinion for salmonids.

Identify any continuing problems and impacts to salmonid streams and habitat from cattle grazing in PRNS and GGNRA.

Discuss where and how often suspended sediment, nutrient or fecal coliform thresholds have been exceeded in salmonid streams, whether ongoing problems have been identified, and what remedies have been implemented.

Discuss where and how often water temperature thresholds have been exceeded in salmonid streams, whether ongoing grazing problems have been identified, and what remedies have been implemented.

Discuss whether excessive sedimentation issues and impacts to channel form and morphology have been identified in salmonid streams from grazing and what remedies have been implemented.

Discuss whether damage, loss or inhibition of growth of riparian vegetation has been identified in salmonid streams. Discuss whether the NPS has met the 2004 NMFS Biological Opinion success criteria for riparian vegetation.

Discuss whether erosion of streambanks or loss of habitat complexity has been identified in salmonid streams from grazing and what remedies have been implemented.

Discuss the results of monitoring for suspended sediment, fecal coliform, channel bed conditions, water temperatures, and riparian vegetation conditions in salmonid streams, as required by the 2004 NMFS Biological Opinion.

Discuss whether and how NPS has ensured that aquatic and riparian habitat conditions in salmonid streams continue to improve and remain in good condition.

California Red-legged Frog

Discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on the California red-legged frog, or frog habitat.

Discuss livestock grazing impacts on red-legged frog habitat in terms of riparian and wetland habitat alteration, water pollution, damage to breeding sites, and trampling of estivation habitat.

Identify the measures the NPS has taken since 2002 to protect seasonal upland habitats and travel corridors for CRLF from impacts by cattle.

Western Snowy Plover

Discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on western snowy plovers or plover habitat.

Discuss whether any cattle have had access to snowy plover nesting areas at PRNS since 2002, including trespass cattle.

Discuss changes in populations of common ravens at PRNS since the 2002 USFWS Biological Opinion, and the role dairies and ranches have in elevating raven populations.

Discuss raven predation on snowy plovers at PRNS since the 2002 Biological Opinion.

Identify what measures have been taken to reduce feeding opportunities for common ravens at ranches and dairies.

Discuss whether the NPS has allowed any increase in silage production or whether the NPS has returned any silage fields to permanent pasture, since the 2002 Biological Opinion.

Myrtle's Silverspot Butterfly

Discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on the Myrtle's silverspot butterfly or butterfly habitat.

Discuss any evidence of livestock trampling host plants or butterfly larvae.

Identify NPS mapping and monitoring of Myrtle's silverspot butterfly larval host and nectar plants, and responses of these plants to different grazing regimes.

Discuss any change in status of Myrtle's silverspot butterfly populations and host plants at PRNS since the 2002 Biological Opinion.

Discuss the measures NPS has taken to remediate adverse impacts to Myrtle's silverspot butterfly and host plants from cattle grazing.

Listed Plants

Discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on Sonoma alopecurus, Sonoma spineflower, Marin dwarf flax, Tiburon paintbrush, Beach layia, or Tidestrom's lupine.

Discuss the scientific evidence that excessive livestock grazing adversely affects Sonoma alopecurus. Discuss the trends of Sonoma alopecurus populations subject to livestock grazing.

Discuss the scientific evidence that livestock grazing negatively affects the Tiburon paintbrush. Discuss the trends of Tiburon paintbrush populations subject to livestock grazing.

Discuss the scientific evidence that livestock grazing may negatively affect the Sonoma spineflower. Discuss the trends of Sonoma spineflower populations subject to livestock grazing.

Discuss the scientific evidence that livestock grazing is a major threat to Tidestrom's lupine, due to loss of dune habitat. Discuss the trends of Tidestrom's lupine populations subject to livestock grazing.

Identify NPS mapping and monitoring of these listed plants, and discuss responses of these plants to different grazing regimes.

Discuss any change in the status of populations of these listed plants at PRNS since the 2002 Biological Opinion.

Discuss any measures taken to remediate adverse impacts from grazing to any of these listed plants, including: seasonal restrictions on grazing; exclusion fencing; and establishment and plantings.

Water Quality Impacts

Discuss the condition of fresh water resources within the ranching areas, and any impairment due to grazing and ranching activities.

Discuss impairment to water quality in creeks within PRNS and GGNRA from livestock grazing and dairies.

Discuss impairment to water quality in wetlands and other freshwater habitats within PRNS and GGNRA, including Drakes Estero and Abbotts Lagoon, from livestock grazing and dairies.

Discuss impairment to water quality in Tomales Bay due to livestock grazing and dairies at PRNS and GGNRA.

Discuss fecal coliform, ammonia and bacteria inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems.

Discuss nutrient inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems.

Discuss sediment inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems.

Discuss how dairies and livestock grazing leases control or fail to control livestock waste discharge and runoff.

Discuss what needs to be done to remediate the impairment of water quality by livestock grazing and provide aquatic resources with "maximum protection, restoration and preservation" as required by the park's enabling legislation and the Organic Act.

Discuss NPS plans to restore creek banks and riparian zones negatively impacted by former or current ranch operations.

What scientifically based buffer zones and setbacks are in place for grazing and ranching operations near streams, riparian areas and wetlands to ensure their ecological function?

Identify any uses of pesticides or other toxic chemicals at ranches and dairies.

Analyze and disclose the ecological impacts from dams and stock ponds on ranchlands.

Discuss how the NPS will ensure that ranching leases comply with water quality standards as required by the Federal Facilities provision of the Clean Water Act.

Discuss how the NPS will consider whether GMP alternatives comply with the Coastal Zone Management Act.

The San Francisco Bay Regional Water Quality Control Board commented on the previously proposed Ranch Comprehensive Management Plan and expressed concerns whether PRNS ranching operations operate in compliance with current federal and state regulations, including Waste Discharge Requirements and/or waivers of WDRs issued by the Water Board. The Board stated "[w]e would like to see specific details developed in the Final NEPA document that

address rangeland assessment and facility inspections, compliance monitoring, record-keeping, implementation of management practices, reporting, and, if necessary, enforcement. The Final NEPA document should also discuss NPS enforcement of State and federal regulations." Discuss how the GMP amendment will address these issues raised by the Water Board.

Discuss how the NPS will address specific issues raised by the Water Board, including: water supply development; impacts to riparian zones; performance standards for fencing; maintenance of dairy and ranch land infrastructure; farmstead storm water BMPs; and water quality monitoring program.

The Water Board requested evaluation of "bacteriological water quality impacts associated with cattle being grazed near, or allowed direct access to creeks where they sometimes linger." How will the GMP amendment address this issue?

The Water Board noted that the NPS has prioritized and completed water pollution remediation actions in some tributaries, but cattle still gain access to several creeks not identified as "top-priority" tributaries. The Water Board stated that it isn't clear how the NPS determined what constitutes a "top priority" and if it has evaluated the water quality impacts of having cattle in "lower priority" tributaries. How will the GMP amendment address this issue?

Other Wildlife and Habitat Impacts

Discuss the science on livestock grazing impacts to native vegetation at PRNS and GGNRA.

Discuss the science on livestock grazing impacts to riparian areas at PRNS and GGNRA.

Identify the amount of water use needed for beef and dairy cattle production at PRNS and GGNRA; quantify how that impacts water available for native wildlife and plants.

Discuss whether pasture dogs are allowed on PRNS and GGNRA lease areas and the impacts on wildlife.

Discuss any rancher depredation of wildlife or requests for wildlife control at PRNS and GGNRA.

Identify whether the NPS pays or allows any other agency or entity to manage or depredate wildlife on PRNS and GGNRA lands.

Forage

Discuss how the NPS determines how much forage is available for livestock on each ranch lease, and identify the forage levels on each ranch lease.

Discuss and quantify the forage needs of tule elk, deer, and other native grazing and browsing animals in PRNS and GGNRA.

Discuss how the NPS determines what percentage of available forage should go to livestock rather than to native wildlife.

Discuss how the NPS determines whether cattle grazing leases and silage operations will leave adequate forage for native grazing and browsing animals during dry and drought years.

Discuss how RDM levels are established for lease areas and whether they are adequately protective of native ecosystems and wildlife.

Discuss the NPS analysis of PRNS grazing (RDM or Residual Dry Matter monitoring), which found overgrazing at several ranches.

Discuss why the NPS has chronically failed to enforce existing RDM standards for grazing leases, and how it will enforce them in the future to prevent overgrazing and erosion.

Discuss documentation of overstocking of cattle and other violations of lease conditions, and NPS failure to enforce lease stocking allowances.

Discuss whether current and proposed livestock stocking levels are maximally protective of creeks, wetlands, wildlife habitat and water quality.

Adjust and update the park's definition of AUMs to accurately reflect the current weights of dairy and beef cattle and their actual forage consumption.

Discuss the impact of mowing for silage on breeding birds, per the 2015 Point Blue report documenting declines in grassland bird abundance and nesting at PRNS.

Best Management Practices

What sort of Best Management Practices does the NPS require through grazing leases?

How does the NPS determine BMPs for grazing leases?

Are the BMPs adequate to protect natural resources?

How much are BMPs monitored? How are BMPs enforced? Disclose examples.

Assess the effectiveness of BMPs in protecting natural resources.

Invasive Species

Discuss the extent to which exotic and invasive plants exist in the ranch areas.

Discuss which invasive plants were brought to PRNS and GGNRA by cattle.

Identify where invasive plants are spread or maintained by cattle grazing and silage production.

Discuss how cattle grazing, importation of hay, and other ranching activities promote the spread of invasive plants.

Discuss how NPS intends to control invasive plants in the lease areas.

Discuss the science regarding whether and under what conditions cattle grazing can help control or spread invasive plants.

Identify where and under what circumstances cattle grazing would be used for invasive plant control, and whether the proposed grazing regimes are reflective of actual grazing practices in lease areas and are enforceable by NPS.

Discuss elevated populations of invasive starlings and native cowbirds due to ranching and dairy operations, and the impacts on nesting of native birds.

Discuss elevated populations of ravens due to ranching and dairy operations and impacts on native wildlife, particularly snowy plovers.

Disease Transmission

Discuss the presence and extent of Brucellosis in wildlife and livestock at PRNS and GGNRA, and the potential and most likely routes of transmission.

Discuss the relative potential for Brucellosis to be transmitted from livestock to wildlife; and from wildlife to livestock.

Discuss the presence and extent of Johne's Disease in wildlife and livestock at PRNS and GGNRA, and the potential and most likely routes of transmission.

Discuss the relative potential for Johne's Disease to be transmitted from livestock to elk and other wildlife; and from wildlife to livestock.

Discuss whether these diseases existed in the park before the reintroduction of elk.

Discuss the historical presence of these diseases in PRNS and GGNRA livestock and the conditions of dairying and ranching activities which can act as a vector for these diseases.

Discuss what role the ranching practice of spreading cattle manure on grasslands likely has in transmitting these diseases to native wildlife.

Discuss the NPS monitoring plan for PRNS and GGNRA livestock for presence of Brucellosis, Johne's Disease, and other livestock diseases which can harm native wildlife.

Discuss the NPS remediation plan for eliminating these diseases from PRNS and GGNRA livestock.

Fencing

Identify where exclusion fencing has been installed to keep livestock out of creeks, riparian areas, wetlands, and freshwater aquatic habitats. Discuss the condition, effectiveness, and monitoring of this exclusion fencing.

Identify where such exclusion fencing does not exist and where livestock have access to creeks, riparian areas, wetlands, and freshwater aquatic habitats.

Discuss issues with lack of maintenance and repair of cattle exclusion fencing, which allows trespass cattle into sensitive areas.

Identify which fences in PRNS and GGNRA are not wildlife friendly, and the potential impacts on elk and other native wildlife. Discuss injuries to and deaths of native wildlife from fencing.

Identify fencing that is unneeded or no longer in use for cattle and provide a timeline for derelict fence removal to improve movement of wildlife.

Roads

Discuss the science showing that ranch roads contribute to erosion, sedimentation of streams, and pollution.

Discuss the extent to which PRNS and GGNRA ranch roads fragment habitat or affect wildlife movement.

Identify ranch roads no longer needed or in use for ranching, for removal to reduce erosion, pollution and sediment.

Discuss the impact that ranching and dairying trucks have on roads, and the extent to which additional repairs are needed on main roads due to impacts from heavy ranching vehicles and equipment.

Fire

Discuss the science which supports the concept of using grazing to control fire fuels.

Discuss the California Department of Parks and Recreation's comprehensive analysis of cattle grazing impacts and its minimal effect on standing biomass and fire hazard reduction on Mount Diablo State Park, and CDPR's experience in managing wildlands without livestock grazing.

Greenhouse Gasses

Discuss how ranching and dairying activities subvert PRNS goals in the Climate Friendly Parks campaign. Discuss 2005 PRNS analysis that 78% of the park's carbon emissions are from dairy wastes (or manure) in the form of methane gas. Identify what portion of the remaining park emissions from transportation sources are from ranching lease activities.

Update the park's outdated GHG emissions inventory conducted in 2005. Discuss current estimate of livestock and dairy ranching contribution to PRNS greenhouse gas emissions and what percentage that represents (include all CO² contributions, including methane emissions from dairies, contributions from milk, hay and manure trucks, farm equipment, etc.).

Will the NPS require methane digesters at any continuing dairies?

Discuss the science showing that concentrated animal feeding operations such as dairies can have serious impacts on air pollution and human health from ammonia and other gases. Analyze and disclose those impacts at PRNS.

Discuss whether any peer-reviewed science supports the concept of carbon sequestration through livestock grazing, and what can realistically be sequestered versus the CO² footprint of ranching operations.

The GMP amendment should ban compost use on rangelands before any CO² offset impacts are proven. The GMP should promote native grassland restoration to sequester carbon.

Public Access/Recreation

Identify where dairying operations and facilities and fencing are not compatible with public access.

Discuss how ranching impedes recreational enjoyment due to cattle waste, unpleasant odors and sights, an industrialized landscape, mowing, reduced wildlife sightings, trail erosion, and a lack of hiking and biking opportunities.

Analyze in detail various alternative public uses for ranching lease lands, including wildlife habitat, wildlife viewing and photography, research, recreation, campgrounds, educational facilities, etc.

Discuss reports and complaints of ranchers closing public lands to recreationists, and fences impeding hiking and enjoyment of PRNS and GGNRA by the public.

Diversification

Fully analyze the damaging environmental impacts of permitting proposed "diversification" schemes, such as new kinds of exotic livestock, small animals, row crops, dairy processing, on-site slaughtering, hotel operations, and other proposed commercial activities within PRNS.

Fully analyze the impacts of allowing row crops, including reduced habitat for wildlife, creating conflicts with native birds and predators that may feed on them, requiring additional fencing, and use of water.

Fully analyze the impacts of allowing chickens, turkeys, ducks, geese, sheep, goats, rabbits and similar small animals, including creating conflicts with native predators.

Fully analyze what new structures and infrastructure would be required for different diversification schemes.

Discuss how various diversification schemes would negatively impact park wildlife.

Discuss whether allowing any additional private economic enterprises or activities would conflict with the purposes of PRNS.

Identify what diversification operations have already been approved, or are being illegally conducted in lease areas, including farm stay operations, chickens, and any agricultural activities other than cattle grazing.

Discuss how various diversification uses would limit or prevent public access.

Residential Facilities and Impacts

Disclose all commercial and residential structures in the grazing lease areas, including primary residences, employee housing, barns, etc. Discuss who pays for them and how much.

Quantify the PRNS ranching contribution to the local, county and state economies.

Assess rancher claims that ending or reducing PRNS ranching would destroy the Marin agricultural economy.

Analyze and disclose how much staff time NPS spends on monitoring, compliance, working with ranchers on BMPs, and permitting in the lease areas, and the estimated annual costs.

Aesthetics

Analyze and disclose the aesthetic impacts to park visitors from ranching and dairying operations, including creating an industrialized environment, ranch vehicles, trash, fencing, damaged roads, lighting, cattle manure, etc.

Historic Resources

Analyze and disclose how ranching affects pre-ranching archaeological resources.

Discuss whether Point Reyes ranching operations and facilities have any unique value as historic resources, given that they are younger than almost every other ranch operation in the country. Discuss whether any of the ranches have historic attributes that cannot be found on nearby private ranches in Marin and Sonoma counties.

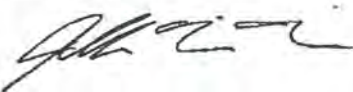
Transparency

Disclose how many meetings the NPS has had with ranchers, agricultural interests, and pro-ranching advocates in developing this plan. How many meetings since the July 2017 settlement was announced? How many meetings since 2014 when the Ranch Comprehensive Management Plan was launched?

Disclose how many meetings the NPS has had with ranching reform advocates, other users of the park, or wildlife interests in the same time periods, in developing this plan.

Discuss how the NPS will ensure that the GMP amendment and EIS will be a fair, open process that is not biased by political pressure or a backroom sweetheart deal for ranchers from the illegal Salazar decision.

Sincerely,



Jeff Miller
Conservation Advocate
Center for Biological Diversity
1212 Broadway, Suite 800
Oakland, CA 94612
jmiller@biologicaldiversity.org



Providing Comments

Please submit your comments online using the NPS's Planning, Environment, and Public Comment (PEPC) web site at: <http://parkplanning.nps.gov/poregmpa> or use the reverse of this page to record your comments and ideas.

Below are some questions for your consideration as you prepare your comments:

- How can Point Reyes protect and manage the diverse and important natural and cultural resources in the planning area? Are there opportunities that could enhance future stewardship in the planning area?
- What types of visitor experiences, activities, and facilities should be available in the planning area?
- What types of specific strategies can/should be considered for managing agricultural lease/permits?
- What types of specific strategies can/should be considered for managing tule elk?

Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment—including your personal information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

The public comment period is open through November 15, 2017.

RECEIVED

2017 NOV 15 PM 1:47

POINT REYES NS

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Pt. Reyes Station, CA 94956

Comments regarding the GMP Amendment:

THANK YOU FOR THE OPPORTUNITY TO PROVIDE COMMENTS DURING THE INITIAL PHASE OF THE PRNS: GANRA GENERAL MANAGEMENT PLAN.

I PREFER THE "CONTINUED RANCHING AND REMOVAL OF THE DRALES BEACH TULE ELIC HERD BASED ON PREVIOUS PRNS GMP AND THE 1998 PRNS TULE ELIC MANAGEMENT PLAN AND ENVIRONMENTAL ASSESSMENT THAT PROVIDES GUIDANCE FOR PRNS DURING THIS NEPA PROCESS. I RECOMMEND THAT PRNS INCLUDE IN THEIR ASSESSMENT OF ALTERNATIVES A COMPREHENSIVE STATEMENT MEASURING COMMUNITY, AGRICULTURAL & ECONOMIC BENEFITS & IMPACTS INCLUDING MULTIPLIER EFFECTS THROUGHOUT THE REGION ~ INCLUDING TOURISM, CULTURAL AND HISTORICAL RESOURCES SHOULD ALSO BE INCLUDED) HIGHLIGHTING THE PARTNERSHIPS OF THE PRNS, GANRA, GENERATIONS OF RANCHERS AS WELL AS NUMEROUS ORGANIZATIONS SUCH AS MCL, SIERRA CLUB, EAC (TO NAME A FEW) AND THE POINT ROYES COMMUNITY WHO HAVE COLLABORATED SINCE THE INCEPTION OF PRNS. ADDITIONALLY THESE PARTNERSHIPS SHOULD BE EVALUATED TO DETERMINE BEST PRACTICES TO ENHANCE VISITOR EXPERIENCE & EDUCATION & CERTAINLY ASSESSMENTS OF VISITOR CAPACITY TO PRESERVE THE INTEGRITY OF THE ECOSYSTEM WITHIN BOTH PRNS & SURROUNDING COMMUNITIES.

I ALSO RECOMMEND PRNS THOROUGHLY ADDRESS THE SUSTAINABLE AGRICULTURE AND REGULATORY COMPLIANCE (IE ORGANIC ETC) CURRENTLY IN PLACE ON RANCHES WITHIN THE SCOPE OF THIS NEPA PROCESS. IT WOULD BENEFIT THE PUBLIC & CLARIFY ANY MISCONCEPTIONS OF PASTORAL ZONE MANAGEMENT, FOR EXAMPLE, BAY AREA WATER QUALITY BOARD, ORGANIC CERTIFICATIONS & REQUIREMENTS FOR THESE OPERATIONS. AND CERTAINLY, PLEASE DIFFERENTIATE BETWEEN SMALL SUSTAINABLE FAMILY FARMS AND LARGE INDUSTRIAL STYLE AGRICULTURAL OPERATIONS.

Your Name: Rhonda Moore

Mailing or email address



Organization (if applicable):

Member

Official Representative

(circle one)

Nunes Family

Historic A, E & D Ranches

November 20, 2017

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes, CA 94956

RECEIVED
2017 NOV 21 AM 10:00
POINT REYES NP

Dear Superintendent:

Thank you for this opportunity to provide comments for the Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGNRA), (collectively the "Seashore"), General Management Plan (GMP) Amendment process and the subsequent National Environmental Policy Act (NEPA) review. We understand this to be the first of several scoping and issue identification steps as part of the GMP and NEPA process.

We support the letter submitted by the Point Reyes Seashore Ranchers Association (PRSRA) dated November 22, 2017 and we will participate fully in subsequent stages and opportunities to discuss the future of GMP and NEPA processes.

Our current leases cover the Historic A, D & E Ranches. It appears that a significant portion of the D could be subject to removal and portions of the E subject to resource protection buffers under the GMP Amendment "Reduced Ranching and Management of the Drakes Beach Tule Elk Herd" alternative. Based on the initial description of the alternative and the map provided, there appears to be no arguably justifiable basis for removing these acres on the land that we lease. We cannot identify the full impact that this acreage removal would have to our business operation and thereby ask that this alternative be amended. Ceasing agricultural use of these acres at the Historic D & E Ranches has the potential to put our present and future business operations at risk of failure.

We look forward to continued communication with NPS. We appreciate the opportunity to provide these initial comments and we look forward to working with PRNS and NPS on all subsequent stages of the GMP and EIS.

Sincerely,

Carleen Betty Nunes *T Nunes* Tim Nunes

Jacqueline Hemelt Jacqueline Hemelt

et

November 13, 2017

GMP Amendment c/o Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Re: Point Reyes National Seashore General Management Plan Amendment

Dear Superintendent Cynthia MacLeod,

Thank you for the opportunity to comment on the Point Reyes National Seashore General Management Plan Amendment (GMPA). I support the following GMPA alternative for the Point Reyes National Seashore General Management Plan Amendment:

- **Continued Ranching and Removal of the Drakes Beach Tule Elk Herd**

Ranching on the Point Reyes National Seashore (PRNS) has been a way of life for families for at least two millennia, whether for the Coast Miwoks, their successors, or our current ranching families. It wasn't until 1962 that PRNS was established by John F. Kennedy, a mere 55 years ago. Ranching in the Pastoral Zone of the PRNS is vital part of what makes the park so beautiful, inviting, and a national treasure. A testament to this is the fact that the number of visitors to the PRNS has steadily increased over time to around 2.5 million a year.

Protecting ranching on the PRNS is in the best interest of our community because of the following considerations, which support ranching as is on the PRNS, including the removal of the Drakes Beach Tule Elk Herd:

1. Grazing benefits are well documented, such as this excerpt from the University of California ANR Publication 8517 – Understanding Working Rangelands – The Benefits of Livestock Grazing California's Annual Grasslands:
 - Livestock grazing is the most effective, efficient way to manage California's grasslands on a landscape scale, particularly when the land is being managed with conservation objectives in mind (Huntsinger et al. 2007). It is proving both a useful buffer against development (and, therefore, against loss or fragmentation of habitat) and a practical way to enhance native biodiversity) Bartolome et al. 2014). Grazing controls the mass, height, and cover of non-native herbaceous vegetation, which is essential for the maintenance of habitat for many of California's native plants and animals, including many that are listed as threatened and endangered. In addition, grazing can reduce the encroachment of shrubs into grassland, which when present increases fire and fuel loads (Russell and McBride 2003) and diminish open grassland habitat (Ford and Hayes 2007).

2. As if ranching is not already very demanding and challenging, ranchers must also comply with California Coastal Act, PRNS restrictions, and other federal requirements. This puts these ranchers at a significant disadvantage to other ranchers located outside of the PRNS. We must strive for greater equity between these ranching zones to help ensure ranchers on the PRNS remain viable and competitive.
3. Another significant issue for several PRNS ranchers is having to contend with the migration of Tule Elk onto their land. The Drakes Beach Tule Elk Herd needs to be removed, including all other free-range elk. There are already designated wilderness areas for elk populations within the park, which is thousands of acres. Tule elk are migrating onto several ranches taking away precious resources for livestock, which includes grass and water. They also cause a substantial amount of damage to fencing that is costly to fix and takes away from their other responsibilities. This means the ranchers must provide additional feed and water to their livestock and pay for fence repairs. There is also the potential to spread Johne's disease from the Drakes Beach Tule Elk Herd to livestock, which has been confirmed in this herd.

I support removing all free-range elk herds because of the significant amount of grass and water they consume on working dairy and livestock ranches. There should be another option for removing the other free-range elk herds besides just the Drakes Beach Tule Elk Herd because this will greatly improve the long-term viability of the affected ranching operations, and could substantially reduce the costs to the public of managing these elk.

4. All dairies on the PRNS are certified organic operations. This means they've met the highest standards of USDA's National Organic Program (NOP) to protect air quality, water quality, soil health, and use of best sustainable practices. One of the key requirements of being a certified livestock operation is that your animals meet the NOP requirement of 120 days on pasture each year. This requirement can be extremely challenging to meet because of the competition from elk feeding on the grass where livestock graze. The PRNS requires ranchers to leave a specified amount of residual dry matter (RDM) as a grazing condition to work the land and keep it protected from soil erosion and nutrient losses.
5. The economic value from ranchers on the PRNS is approximately 20 million in gross dollar amount (or ~20% of the total agricultural production in Marin County). If value-added products are included, that value jumps to about 64 million. These are impressive agricultural production numbers. The importance of our seashore ranchers cannot be understated.

What would the PRNS look like without continuing ranching as is? It would be very different. I believe the public would be disappointed with the transformation of their national park because of the following changes:

- Reduced biodiversity
- Less grasslands due to the encroachment of native coyote brush and poison oak
- Greater risk of catastrophic wildfires due to increased fuel-loads
- Fewer threatened and endangered species
- Significant economic losses to ranchers
- Reduced overall soil health since nutrients are not replenished to the soil through livestock manure

We have a duty and responsibility to protect our natural resources, parks, and wilderness areas. This means protecting and supporting our ranchers on the PRNS, and continuing what has been done by ranching families on this land for hundreds of generations.

Sincerely,



Stefan Parnay



RECEIVED

2017 NOV 20 AM 10: 46

POINT REYES NS

Kathleen Respini

15 November 2017

Dear Responders,

This is to all of you who are not only first responders, but responders of every area and of every expertise, on the front lines, or behind the scenes, who responded in one way or another, during the wild fire crisis in Northern California during the month of October, 2017.

I am an ordinary citizen of the city of Napa. I was very fortunate in that my home happens to be in a neighborhood that was untouched by the fire. We also had cell phone service and electricity during the entire crisis. That's not to say we weren't very nervous as the situation remained fluid for so many days.

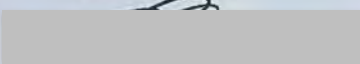
As I had errands to take care of during these days, I couldn't help but notice the multitude of police, sheriff, fire, news, and many other vehicles that originated from so many places...with city or county names I didn't even recognize. It was this that touched me to my core. I know you all will say you were just doing your jobs, but to me, you all are the heroes who came to our aide in our most desperate hours. I thought of the families you left behind, some under evacuation. And I thought of those of you whose homes were burned to the ground as you fought to save our communities. I thought of your selflessness as you worked long hours in unforgiving conditions. I saw the many white tents and the trucks all lined up at the Town and Country Fair Grounds in Napa. As I drove past, I willed my truck to be quiet so as not to disturb your sleep. It felt as though even the ground you slept on was sacred, bringing much needed rest.

I have never witnessed such sacrifice by so many for communities where they are not even known. This is humanity at its best, while in the worst of circumstances. This was nothing short of amazing.

I wish to convey my deepest appreciation to all of you, each and every one, although I doubt there are words adequate to this task.

Thank you from the bottom of my heart.

Sincerely,


Kathleen Respini

November 15, 2017

Cynthia MacLeod, Acting Superintendent
Point Reyes National Seashore
1 Bear Valley Rd.
Point Reyes Station, CA 94956

Subject: Comments on L7617 - General Management Plan (GMP) Amendment

RECEIVED
2017 NOV 20 AM 10:15
POINT REYES NS

Superintendent MacCleod,

I am providing public comments on L7617 – General Management Plan (GMP) Amendment, for the Point Reyes National Seashore. I have expertise in environmental law because I earned an LLM in Environmental Law from Golden Gate University School of Law in December 2016. However, my comments are about applying basic legal skills for the interpretation of federal laws.

I. Alternatives 1 and 2 Must be Eliminated Because In 1962 and in 1978, Congress Expressly Stated its Intent to Preserve Both Cattle Ranching and Dairy Farming Within the Point Reyes National Seashore

In 1962, in Public Law No. 87-657, section 4, Congress stated:

No parcel of more than five hundred acres... shall be acquired without the consent of the owner so long as it remains in its natural state, *or is used exclusively for ranching and dairying purposes* including housing directly incident thereto. The term “ranching and dairying purposes,” as used herein, means such ranching and dairying, primarily for the production of food, as is presently practiced in the area.

In acquiring access roads within the pastoral zone, the Secretary shall give due consideration to existing ranching and dairying uses and shall not unnecessarily interfere with or damage such use.¹ (emphasis added)

In this section, Congress stated its intent to preserve cattle ranching and dairy farming, within the proposed boundaries of the Point Reyes National Seashore. And then Congress clarified its intent by defining the term “ranching and dairying purposes,” specific to the Point Reyes and by

¹ The Point Reyes National Seashore Establishment Act, Pub. L. No. 87-657, § 4, 76 Stat. 538 (Sept. 13, 1962) codified at 16 U.S.C.A § 459c-459c-2.

directing the Secretary to protect the access roads - so that cattle ranching and dairy farming would continue. Thus, in section 4, Congress provided explicit instructions to the Secretary for cattle ranching and dairy farming to continue, within the boundaries of the then-proposed Point Reyes National Seashore.²

In 1978, in Public Law No. 95-625, known as the "National Parks and Recreation Act of 1978," Congress defined the term "agricultural property," that was specific to the Point Reyes National Seashore. In section 318(c), Congress stated:

The term "agricultural property" as used in this Act means lands which were in regular use for, or were being converted to agricultural, *ranching, or dairying purposes* as of May 1, 1978, together with residential and other structures related to the above uses of the property.³ (emphasis added)

Within section 318(c), Congress restated its intent for cattle ranching and dairy farming to continue at the Point Reyes National Seashore.⁴

One counterargument is that the Secretary "has discretion" to remove cattle ranching and dairy farming from the Point Reyes National Seashore.⁵ With the Organic Act of 1916, Congress granted the Director of the National Park Service, within the Department of Interior, with the authority to manage the "several national parks," and to "make and publish such rules and regulations as he may deem necessary."⁶ However, the Department of Interior must act according to the applicable Public Laws and according to the intent of Congress within such laws – because federal laws are superior to federal agency policies. And on the subject of the Secretary's discretion, in 2012, Secretary of the Interior Ken Salazar published a letter to announce his decision to remove the Drakes Bay Oyster Company from Drakes Estero. In the letter, Secretary Salazar explained that cattle ranching and dairy farming should continue at the Point Reyes National Seashore – because Congress wanted for those activities to continue.⁷

² The Point Reyes National Seashore Establishment Act, Pub. L. No. 87-657, § 4, 76 Stat. 538 (Sept. 13, 1962). *But See* Resource Renewal Institute, et al. v. National Park Service, 3, Case 3:16-cv-00688 (N.D. Calif., filed 02/10/2016) (claiming: "Although ranching within the National Seashore is not mandated by any law...").

³ The National Parks & Recreation Act of 1978, Pub. L. No. 95-625, § 318(c), 92 Stat. 3467 (Nov. 10, 1978); codified at 16 U.S.C.A § 459c-5(b).

⁴ *Id.*

⁵ Resource Renewal Institute, et al. v. National Park Service, 2, Case 3:16-cv-00688 (N.D. Calif., filed 02/10/2016).

⁶ National Park Service Organic Act, Pub. L. No. 64-235, 39 Stat. 535 (Aug. 25, 1916), codified at 16 U.S.C.A § 1-4 ("The property acquired by the Secretary under such sections shall be administered by the Secretary..."); The Point Reyes National Seashore Establishment Act, Pub. L. No. 87-657, § 7, 76 Stat. 538, codified at 16 U.S.C.A § 459c-6 (Sept. 13, 1962) ("The property [within the boundaries of the proposed Point Reyes National Seashore] acquired by the Secretary under this Act shall be administered by the Secretary, subject to the provisions of the Act entitled "An Act to establish a National Park Service," and for other purposes, approved August 25, 1916...").

⁷ Letter from Secretary Ken Salazar, Department of Interior, to Director, National Park Service, 6 (Nov. 29, 2012) (claiming: "Long-term preservation of ranching was a central concern of local interests and members of Congress as they considered legislation to establish the Point Reyes National Seashore in the late 1950s and early 1960s.").

Because Congress has expressly stated its intent for cattle ranching and for dairy farming to continue at Point Reyes, through Public Law 87-657 (1962) and Public Law 95-625 (1978), then Congress is the governmental entity that must decide whether to discontinue cattle ranching or dairy ranching, or both, at the Point Reyes National Seashore.⁸ As a result, the Secretary of the Department of Interior does not have the authority to decide to remove cattle ranching or dairy farming, or both, from the Point Reyes National Seashore, within a purely administrative General Management Plan (GMP) Amendment.

As a result, Alternative 1, for "No Ranching and Limited Management of Tule Elk," and Alternative 2, for "No Dairy Ranching and Management of Drakes Beach Tule Elk Herd," must be eliminated from the General Management Plan (GMP) Amendment process for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area.⁹

II. Alternatives 1 and 2 Must be Eliminated Because The "Potential Wilderness" Process is Applied in Order to Convert Developed Areas Within a National Park to Undeveloped "Wilderness Areas" – and it Involves Congress.

If the Secretary of the Department of Interior decided to eliminate all cattle ranching and dairy farming, or just all dairy farming, at the Point Reyes National Seashore through a General Management Plan (GMP) Amendment, then presumably, the goal would be for all of the affected areas to be converted into undeveloped areas. And the proper method to carry out this task would be to apply the "Potential Wilderness" process, which involves Congress.¹⁰ The "Potential Wilderness" process was established with Public Law 94-544 (Oct. 18, 1976) and Public Law 94-567 (Oct. 20, 1976).¹¹ To clarify, a "Potential Wilderness Area" is an area that would qualify to be designated as a "Wilderness Area," except for a preexisting "prohibited use."¹²

The Potential Wilderness process begins when the Secretary of the Department of Interior identifies an area within a National Park that would qualify as a "Wilderness" area, except for a pre-existing "prohibited use."¹³ According to the Wilderness Act of 1964, "prohibited uses"

⁸ The Point Reyes National Seashore Establishment Act, Pub. L. No. 87-657, § 4 (Sept. 13, 1962); National Parks & Recreation Act of 1978, Pub. L. No. 95-625 § 318(c) (Nov. 10, 1978).

⁹ Letter to "Interested Parties" about the L7617 - GMP Amendment process and the six concept alternatives, from U.S. Department of Interior (Oct. 16, 2017).

¹⁰ The Wilderness Act of 1964, Pub. L. No. 88-577, §3(c), 76 Stat. 890 (Aug. 20, 1964) codified at 16 U.S.C.A. § 1132(c).

¹¹ An Act to Designate Certain Lands in the Point Reyes National Seashore, California, as Wilderness, Pub. L. No. 94-544, 90 Stat. 2515 (Oct. 18, 1976); An Act to Designate Certain Lands Within Units of the National Park System as Wilderness, Pub. L. No. 94-567, 90 Stat. 2692 (Oct. 20, 1976).

¹² *Id.*; The Wilderness Act of 1964, §4(c) codified at 16 U.S.C.A. § 1133(c).

¹³ An Act to Designate Certain Lands in the Point Reyes National Seashore, California, as Wilderness, Pub. L. No. 94-544, 90 Stat. 2515 (Oct. 18, 1976); An Act to Designate Certain Lands Within Units of the National Park System as Wilderness, Pub. L. No. 94-567, 90 Stat. 2692 (Oct. 20, 1976).

include: commercial enterprise, permanent roads, temporary roads, use of motor vehicles, and structures.¹⁴ For example, cattle ranches or a dairy farms, with structures, would be “prohibited uses.”¹⁵ The next step is for the Secretary to prepare a “Wilderness Proposal” and to hold a hearing and to gather comments from state and local government entities and from the public about whether the area should be designated as a “Potential Wilderness Area.”¹⁶ Through the President, the Secretary submits a report to Congress, and then Congress holds a hearing, in order to decide whether the area should be designated as a “Potential Wilderness Area” or not.¹⁷

If Congress designates an area as a “Potential Wilderness Area,” and once the Secretary has removed the “prohibited use” from the area, then the “Potential Wilderness Area” automatically converts to a “Wilderness Area.”¹⁸ And the final step is for the Secretary to publish a notice in the Federal Register.¹⁹ This “Potential Wilderness” designation process is also summarized in the Final Environmental Impact Statement for the Drakes Bay Oyster Company Special Use Permit, dated November 2012, on page 263.²⁰

Within the Point Reyes National Seashore, several areas have been designated as “Potential Wilderness Areas,” which have then been subsequently converted into “Wilderness Areas.” For example, in the early 1970’s, the Secretary identified the “Muddy Hollow,” “Abbotts Lagoon,” “Limantour Area,” and “Drakes Estero” as “Potential Wilderness” areas.²¹ The Secretary created “Potential Wilderness” proposals for the areas, held a hearing, and gathered governmental and public comments, as required.²² Congress held Committee hearings, and then Congress decided to designate all four of the areas as “Potential Wilderness Areas.”²³

¹⁴ The Wilderness Act of 1964, §4(c), codified at 16 U.S.C.A. §1133(c).

¹⁵ *Id.*

¹⁶ The Wilderness Act of 1964, §3(d), codified at 16 U.S.C.A. §1132(d). *See e.g.* Wilderness Recommendation, Point Reyes National Seashore, Aug. 1972; Final Environmental Statement, Proposed Wilderness, Point Reyes National Seashore (Apr. 23, 1974).

¹⁷ The Wilderness Act of 1964, §3(d), codified at 16 U.S.C.A. §1132(d).

¹⁸ The Wilderness Act of 1964, §3(c) (“A recommendation of the President for designation as wilderness shall become effective only if so provided by an Act of Congress.”) codified at 16 U.S.C.A. §1132(c); An Act to Designate Certain Lands Within Units of the National Park System as Wilderness, Pub. L. No. 94-567, 90 Stat. 2692, § 3 (Oct. 20, 1976) (“All lands which represent potential wilderness additions, upon publication in the Federal Register of a notice by the Secretary of the Interior that all uses thereon prohibited by the Wilderness act have ceased, shall thereby be designated wilderness.”).

¹⁹ An Act to Designate Certain Lands Within Units of the National Park System as Wilderness, Pub. L. No. 94-567, 90 Stat. 2692, § 3 (Oct. 20, 1976).

²⁰ Final Environmental Impact Statement, Drakes Bay Oyster Company Special Use Permit, 263 (Nov. 2012).

²¹ Final Environmental Statement, Proposed Wilderness, Point Reyes National Seashore (Apr. 23, 1974).

²² Fed. Reg., Vol. 36, No. 134, 13044 (July 13, 1971), “Notice of Public Hearing Regarding Wilderness Proposal.”

²³ Final Environmental Statement, Proposed Wilderness, Point Reyes National Seashore, (Apr. 23, 1974); House Report No. 94-1680 (Sept. 24, 1976); Senate Report No. 94-1357 (Sept. 29, 1976); An Act to Designate Certain Lands in the Point Reyes National Seashore, California, as Wilderness, Pub. L. No. 94-544, 90 Stat. 2515 (Oct. 18, 1976).

In 1999, because “prohibited uses” had been removed from the “Muddy Hollow,” “Abbotts Lagoon,” and “Limantour Area,” those areas converted from “Potential Wilderness Areas” into “Wilderness Areas.”²⁴ Similarly, in November 2012, Secretary Salazar, of the Department of Interior, decided to remove the Drakes Bay Oyster Company from the “Drakes Estero Potential Wilderness Area” by not renewing the lease.²⁵ And then Secretary Salazar published a notice in the Federal Register that the “Drakes Estero Potential Wilderness Area” had converted into a “Wilderness Area.”²⁶ (Although the oyster company filed a lawsuit in order to have its lease renewed, the Secretary ultimately prevailed.²⁷)

As a result, the proper way to remove *all* of the cattle ranches and *all* of the dairy ranches, or to *only* remove the dairy ranches, from the Point Reyes National Seashore, would be for the Secretary of the Department of Interior to follow the Congressional Potential Wilderness Process.²⁸ That is, the Secretary of the Department of Interior does not have the authority to remove the cattle ranches and dairy farms, or just the dairy farms, through a purely administrative process, such as creating a General Management Plan (GMP) Amendment. As a result, Alternative 1, for “No Ranching and Limited Management of Tule Elk,” and Alternative 2, for “No Dairy Ranching and Management of Drakes Beach Tule Elk Herd,” must be eliminated from the General Management Plan (GMP) Amendment process for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area.²⁹

III. Alternative 3, for “Reduced Ranching and Management of the Drakes Beach Tule Elk Herd,” Must be Evaluated Further Before it can be Included in the GMP Amendment Process

The issue is: Was cattle ranching or dairy farming established in the areas identified for “closure of ranch operations” prior to May 1, 1978?³⁰ If so, then Congress must decide whether to eliminate cattle ranching or dairy farming in the areas designated in the General Management Plan (GMP) Amendment proposal, alternative 3, and the Secretary of the Department of Interior lacks the authority to make the decision to remove cattle ranching and dairy farming from those areas.³¹ As a result, Alternative 3 may require further analysis before it can continue to be considered in the GMP Amendment process.

²⁴ Fed. Reg., Vol. 64, No. 222, 63057 (Nov. 18, 1999).

²⁵ Letter from Secretary Ken Salazar, Department of Interior, to Director, National Park Service (Nov. 29, 2012).

²⁶ Fed. Reg., Vol. 77, No. 233, 71826-27 (Dec. 4, 2012).

²⁷ *Drakes Bay Oyster Co. v. Salazar*, 921 F.Supp.2d 972 (N.D. California, Feb. 4, 2013); *Drakes Bay Oyster Co. v. Jewell*, 729 F.3d 967 (Ninth Cir., 2013).

²⁸ An Act to Designate Certain Lands in the Point Reyes National Seashore, California, as Wilderness, Pub. L. No. 94-544, 90 Stat. 2515 (Oct. 18, 1976); An Act to Designate Certain Lands Within Units of the National Park System as Wilderness, Pub. L. No. 94-567, 90 Stat. 2692 (Oct. 20, 1976).

²⁹ Letter to “Interested Parties” about the L7617 - GMP Amendment process and the six concept alternatives, from U.S. Department of Interior (Oct. 16, 2017).

³⁰ The National Parks & Recreation Act of 1978, Pub. L. No. 95-625, § 318(c), 92 Stat. 3467 (Nov. 10, 1978); codified at 16 U.S.C.A § 459c-5(b).


³¹ Letter to “Interested Parties” about the L7617 - GMP Amendment process and the six concept alternatives, from U.S. Department of Interior (Oct. 16, 2017).

Conclusion

Because the Secretary of the Department of Interior does not have the authority to remove (nearly) all of the cattle ranches and (nearly) all of the dairy farm operations from the Point Reyes National Seashore, then alternative 1, for “No Ranching and Limited Management of Tule Elk,” must be eliminated.³² In addition, because the Secretary does not have the authority to remove all of the dairy farm operations from Point Reyes, then alternative 2, for “No Dairy Ranching and Management of Drakes Beach Tule Elk Herd,” must be eliminated.³³ Further, if prior to May 1, 1978, cattle ranching and/or dairy farming was established in the areas under consideration for the removal of such activities in alternative 3, then the Secretary does not have the authority to remove cattle ranching and/or dairy farming from those proposed areas.³⁴

The main reason why substantial residential and commercial development did not occur at Point Reyes – is because so many cattle ranches and dairy farms were already established there, and because Congress has consistently encouraged the cattle ranchers and dairy farmers to remain there. In order to establish the Seashore, the Secretary of the Department of Interior was required to purchase enough land from the cattle ranchers and the dairy farmers so that the new Point Reyes National Seashore could be “efficiently” administered.³⁵ As a result, many of the ranchers and farmers agreed to sell their land to the Secretary – because the ranchers and farmers trusted that the federal government would continue to lease-back the same land they were on. And now, if certain organizations want for the entire Point Reyes National Seashore to be converted into an undeveloped “Wilderness Area,” or for more sections within the Point Reyes National Seashore to become “Wilderness Areas,” then they, and the Secretary of the Department of Interior, and the President of the United States will have to convince Congress to make those decisions.³⁶

Regards,


Catherine Rucker, Esq.
CA Bar#: 309559

³² The Point Reyes National Seashore Establishment Act, Pub. L. No. 87-657, § 4, 76 Stat. 538 (Sept. 13, 1962); The National Parks & Recreation Act of 1978, Pub. L. No. 95-625, § 318(c), 92 Stat. 3467 (Nov. 10, 1978); codified at 16 U.S.C.A § 459c-5(b); L7617 - GMP Amendment Handout (2017) (exceptions for two areas with “reserved life estates”)

³³ *Id.*

³⁴ The National Parks & Recreation Act of 1978, Pub. L. No. 95-625, § 318(c), 92 Stat. 3467 (Nov. 10, 1978); codified at 16 U.S.C.A § 459c-5(b).

³⁵ The Point Reyes National Seashore Establishment Act, Pub. L. No. 87-657, § 4, 76 Stat. 538 (Sept. 13, 1962).

³⁶ An Act to Designate Certain Lands in the Point Reyes National Seashore, California, as Wilderness, Pub. L. No. 94-544, 90 Stat. 2515 (Oct. 18, 1976); An Act to Designate Certain Lands Within Units of the National Park System as Wilderness, Pub. L. No. 94-567, 90 Stat. 2692 (Oct. 20, 1976); *See e.g.*, Resource Renewal Institute, et al. v. National Park Service, Case 3:16-cv-00688 (N.D. Calif., filed 02/10/2016).

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November 15, 2017

2017 NOV 20 AM 10:16

POINT REYES NS

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Re: Point Reyes General Management Plan Amendment

PROTECT POINT REYES ELK AND WILDLIFE

Our 115 organizations from 30 states strongly support the management of Point Reyes National Seashore to protect its outstanding natural values and to provide for public recreation, benefit, and inspiration.

We support allowing free-roaming tule elk herds to remain at Point Reyes National Seashore, and object to any fencing, removal, hazing, sterilization, or killing of elk in the park. The General Management Plan amendment for Point Reyes National Seashore should prioritize restoration of the park's elk herds to historic numbers. There is immense public value to the native tule elk at Point Reyes, the only tule elk herds within the National Park system. Elk are an ecologically important part of the landscape of Point Reyes and their recovery is a success story for restoring native ecosystems, consistent with the mission of the National Park Service.

Commercial leases or activities in the park should not conflict or interfere with protection of natural resources or public uses. Commercial lease holders on our public lands in the park should not dictate wildlife removal or exclusion policies that harm park wildlife. Any cattle ranching operations in the park must be managed to accommodate elk and other native wildlife, and should not harm habitat for endangered species. Any ongoing cattle grazing leases must be managed in a way that does not damage ecosystems or negatively impact wildlife habitat, water quality, native vegetation, public recreation or the aesthetic beauty of the park.

We object to any conversion of Point Reyes National Seashore lands to row crops, which would degrade wildlife habitat and water quality in the park and prevent public access. We also oppose expansion of commercial livestock farming to introduce sheep, goats, pigs, turkeys or chickens, which would create conflicts with predators and pressure to kill bobcats, coyotes and foxes.

The National Park Service is charged with managing Point Reyes National Seashore in a manner which provides maximum protection, restoration, and preservation of the natural environment. The Park Service's amendment to the General Management Plan should prioritize protecting the native wildlife and natural values of Point Reyes National Seashore.

Sincerely,

Center for Biological Diversity
Randi Spivak, Public Lands Program Director
Washington, DC

Resource Renewal Institute
Deborah Moskowitz, President
Mill Valley, CA

Western Watersheds Project
Erik Molvar, Executive Director
Laramie, WY

Marin/Sonoma Organizations:

Animal Legal Defense Fund
Stephen Wells, Executive Director
Cotati, CA

Defense of Place
Nancy Graalman, Director
Mill Valley, CA

Fund for Wild Nature
Marnie Gaede, President
Sebastopol, CA

Golden West Women Flyfishers
Cindy Charles, Conservation Chairperson
San Rafael, CA

In Defense of Animals
Elliot M. Katz, Founder and President Emeritus
San Rafael, CA

Madrone Audubon Society
Susan Kirks, President
Santa Rosa, CA

Oceanic Preservation Society
Louie Psihoyos, Executive Director
Greenbrae, CA

Paula Lane Action Network
Susan Kirks, Board Member
Petaluma, CA

Sonoma County Wildlife Rescue
Desiree McGunagle, Volunteer & Community Support Coordinator
Petaluma, CA

Turtle Island Restoration Network
Todd Steiner, Executive Director
Olema, CA

WildCare

Vaughn Maurice, Executive Director
San Rafael, CA

Yellowbilled Tours

Richard Cimino
Larkspur, CA

Other Organizations:**350 New Orleans**

Renate Heurich, Vice President
New Orleans, LA

Advocates for Snake Preservation

Melissa Amarello, Co-founder
Tucson, AZ

Alameda Creek Alliance

Jeff Miller, Director
Fremont, CA

All-Creatures.org

Veda Stram, Administrator
Athens, NY

Animals Are Sentient Beings

Sarah Stewart, President
Cambridge, MA

Basin and Range Watch

Laura Cunningham, Executive Director
Cima, CA

Blue Sphere Foundation

Candace Crespi, Campaigns Manager
New York, NY

California Water Impact Network

Carolee Krieger, President and Executive Director
Santa Barbara, CA

Cascadia Wildlands

Josh Laughlin, Executive Director
Eugene, OR

Citizens Coalition for a Safe Community

Paul Ferrazzi, Executive Director
Culver City, CA

Citizens Committee to Complete the Refuge

Carin High, Co-chair
Palo Alto, CA

Ciudadanos Del Karso

Abel Vale, President
San Juan, PR

Coastal Conservation League

Dana Beach, Executive Director
Charleston, SC

Committee for the Preservation of the Tule Elk

Bruce Keegan, Secretary
San Francisco, CA

Conservation Congress

Denise Boggs, Director
Chico, CA

Cool Planet

Paul Thompson, Co-founder and Co-Director
Edina, MN

Cumberland Chapter of Sierra Club

Tom Morris, Chapter Chair
Lexington, KY

Eastern Coyote/Coywolf Research

Jonathan Way, Founder
Osterville, MA

Ecologistics

Stacey Hunt, Chief Executive Officer
San Luis Obispo, CA

Endangered Habitats League

Dan Silver, Executive Director
Los Angeles, CA

Endangered Species Coalition

Leda Huta, Executive Director
Washington, DC

Environmental Protection Information Center (EPIC)

Tom Wheeler, Executive Director
Arcata, CA

Fairmont Minnesota Peace Group

Judi Poulson, Chair
Fairmont, MN

Farmworker Association of Florida

Jeannie Economos
Apopka, FL

Federation of Western Outdoor Clubs *(42 Member Clubs and Organizations)*

George Milne, President
Oak Grove, OR

Food & Water Watch

Wenonah Hauter, Executive Director
Washington, DC

Friends of Animals Wildlife Law Program

Michael Harris, Director
Denver, CO

Friends of Bell Smith Springs

Sam Stearns, Public Education Coordinator
Stonefort, IL

Friends of the Black-tail Prairie Dog

David Orr, President
Austin, TX

Friends of Del Norte

Joe Gillespie, President
Crescent City, CA

Friends of the Earth – US

Gary Graham Hughes, Senior California Advocacy Campaigner
Berkeley, CA

Friends of the Santa Clara River

Ron Bottorff, Chairman
Newbury Park, CA

GARDEN (Growing Alternative Resource Development and Enterprise Network)

Susan Silverman, Executive Director
Tucson, AZ

Global Justice Ecology Project

Ruddy Turnstone
Buffalo, NY

Golden Gate Audubon Society

Cindy Margulis, Executive Director
Berkeley, CA

Great Salt Lake Audubon

Heather Dove, President
Salt Lake City, UT

Green Peace Corps

Tom Thirion
Albuquerque, NM

Hilton Pond Center for Piedmont Natural History

Bill Hilton Jr., Executive Director
York, SC

Howling For Wolves

Maureen Hackett, President
Hopkins, MN

Idle No More SF Bay

Pennie Opal Plant, Co-founder
San Francisco, CA

Independent Environmental Conservation & Activism Network

Leslie Perrigo, Executive Director
Muncie, IN

inNative

David Jaber, Principal
Berkeley, CA

Interfaith Council for the Protection of Animals and Nature

Lewis Regenstein, President
Atlanta, GA

International Society for the Preservation of the Tropical Rainforest

Arnold Newman, Executive Director
Los Angeles, CA

Kettle Range Conservation Group

Timothy Coleman
Republic, WA

Kickapoo Peace Circle

Marcia Halligan
Viroqua, WI

Klamath Forest Alliance

Kimberly Baker, Executive Director
Orleans, CA

The Lands Council

Mike Petersen, Executive Director
Spokane, WA

Long Branch Environmental Education Center

Paul Gallimore, Director
Leicester, NC

Louisiana Bucket Brigade

Anne Rolfes, Founding Director
New Orleans, LA

Massachusetts Forest Watch

Chris Matera
Springfield, MA

Minnesota River Valley Audubon Chapter

Matthew Schaut, President
Bloomington, MN

Mission Peak Fly Anglers

Steve Schramm, Conservation Chair
Fremont, CA

Moloka'i Community Service Council

Karen Holt
Kaunakakai, HI

Monterey Coastkeeper

Steve Shimek, Executive Director and Founder
Monterey, CA

Mount Diablo Audubon Society

Nancy Wenninger, Conservation Chair
Walnut Creek, CA

National Whistleblower Center

Stephen M. Kohn, Executive Director
Washington, DC

National Wolfwatcher Coalition

Nancy Warren, Executive Director
Duluth, MN

Nature Abounds

Melinda Hughes, President
DuBois, PA

North County Watch

Susan Harvey, President
Templeton, CA

Northcoast Environmental Center
Larry Glass, Executive Director
Arcata, CA

Northeast Oregon Ecosystems
Wally Sykes, Co-founder
Joseph, OR

Northlake Unitarian Universalist Church
Rev. Jim VanderWeele
Kirkland, WA

Northwest Animal Rights Network
Rachel Bjork, Board Member
Seattle, WA

Northwest Arkansas Audubon Society
Carol Joan Patterson, Vice-President and Conservation Chair
Fayetteville, AR

Ocean Outfall Group
Joey Racano, Director
Los Osos, CA

Ohlone Audubon Society
William Hoppes, President
Hayward, CA

The Otter Project
Steve Shimek, Executive Director
Monterey, CA

Pacific Environment
Domenique Zuber, Advancement Director
San Francisco, CA

Pasadena Audubon Society
Laura Garrett, President
Pasadena, CA

Pelican Media
Judy Irving, Executive Director
San Francisco, CA

Prairie Rivers Network
Carol Hays, Executive Director
Champaign, IL

Predator Defense
Brooks Fahy, Executive Director
Eugene, OR

Public Lands Project

Mike Hudak, Director
Binghamton, NY

Rainier Audubon Society

Dan Streiffert, Conservation Chair
Auburn, WA

Raptors Are The Solution

Lisa Owens Viani, Director
Berkeley, CA

Regional Parks Association

Amelia Wilson, President
Berkeley, CA

RESTORE: The North Woods

Michael Kellett, Executive Director
Hallowell, ME

San Luis Obispo Coastkeeper

Gordon Hensley
San Luis Obispo, CA

Santa Cruz Climate Action Network

Pauline Seales, Organizer
Santa Cruz, CA

Save Our Shores

Katherine O'Dea, Executive Director
Santa Cruz, CA

Save Our Sky Blue Waters

Lori Andresen, President
Duluth MN

Save Richardson Grove Coalition

Barbara Kennedy, Campaign Coordinator
Weott, CA

Save The Frogs!

Kerry Kriger, Executive Director
Laguna Beach, CA

Seven Generations Ahead

Gary Cuneen, Executive Director
Oak Park, IL

Wildlife Rehabilitation Center of Northern Utah

Buz Marthaler, Chairman and Co-Founder

Ogden, UT

The Wildlife Trust

Edward Loosli, President

Walnut Creek, CA

RECEIVED

2017 NOV 22 AM 10: 01

POINT REYES NS

70 Crane Drive

San Anselmo, CA 94960

19 November 2017

General Management Plan

c/o Superintendent, PRNS

1 Bear Valley Road

Point Reyes Station, CA 94956

Re: PRNS Management Plan

Dear Sir:

I have lived in Marin County since 1958, and I have enjoyed PRNS and visited it times beyond number. I wish to support the original intent of the GMP for Point Reyes National Seashore, to wit:

1. Continue the present-day ranching/farming/dairy operations and support them by awarding 20-year leases and/or permits.
2. Manage the tule elk herd! Don't let them reproduce uncontrollably and ruin pasture (grazing) management!
3. Keep the Stewart Horse Camp and allow the present concession holder to continue operating this valuable amenity.

Thank you for extending the comment period.

Yours very truly,

A rectangular grey box redacting the signature of Constance B. Berto.

Constance B. Berto

(Mrs. Frank J. Berto)

Cc: files

RECEIVED

Nov 21 2017

2017 NOV 28 AM 3: 57

POINT REYES NS

To Whom it may concern.

I very strongly urge the National Park Service to adopt the option that would allow ranching to continue on Point Reyes with the ability of the ranchers to diversify as they deem necessary to keep their operations viable, and that the Park Service should control the Tule Elk herd that is currently encroaching on the Pastoral Zone. The Point Reyes Ranching Community have been careful stewards of their land for many generations and with the support of the Park Service, will hopefully be allowed to continue into the foreseeable future.

The Point Reyes ranches are an essential part of a larger Marin County agricultural network, and if ranching on the Point is not allowed to continue. The supporting, County wide, food producing infrastructure will be in imminent threat of collapse. It is unconscionable to consider the inability to locally produce our own food supply from an environmental, economic, and practical standpoint, especially when our local ranchers raise their animals humanely, sustainably, and for the most part, organically.

I hope this letter will be accepted despite lacking the numerical identification of the option above. Despite a protracted search of the Website, I could not find the six options listed.

Sincerely //


Milly Bfller

Am Butler



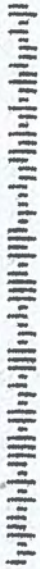
SAN FRANCISCO CA 941

22 NOV 2017 PM 4 1



NP Amendment C/D
Superintendent
Point Reyes National Seashore
1 Bear Valley Rd.
Point Reyes Station

94056-9755 94956



CALIFORNIA CATTLEMEN'S ASSOCIATION

1221 H STREET - SACRAMENTO, CALIFORNIA - 95814-1910

SERVING THE CATTLE
COMMUNITY SINCE 1917

PHONE: (916) 444-0845
FAX: (916) 444-2194
www.calcattlemen.org

November 16, 2017

Cynthia MacLeod
Acting Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

RECEIVED
2017 NOV 21 PM 12:36
POINT REYES NS

Re: Point Reyes National Seashore General Management Plan Amendment Initial Public Comment Period

Dear Superintendent MacLeod:

The California Cattlemen's Association (CCA), Public Lands Council (PLC), and National Cattlemen's Beef Association (NCBA) appreciate the opportunity to provide initial feedback on the General Management Plan (GMP) amendment for the Point Reyes National Seashore (PRNS) and the north district of the Golden Gate National Recreation Area (GGNRA). CCA represents more than 1,700 cattle ranchers throughout the state of California, including many of the ranchers at PRNS and GGNRA. PLC is the only organization devoted solely to representing the 22,000 cattle and sheep producers who hold public lands grazing permits throughout the western United States. NCBA is the national trade association representing United States cattle producers, with more than 25,000 individual members throughout the nation.

The GMP amendment is of importance to our organizations not just because of its immediate impact upon the ranchers at the PRNS and GGNRA, but also because any impact of the GMP upon ranchers at Point Reyes is likely to reverberate throughout Marin County, and may have direct, indirect, or precedential impacts upon ranchers elsewhere in California or on other federal lands throughout the United States.

Of primary importance to our organizations and their members is that the National Park Service (NPS) provide long-term leases for the ranching operations within the PRNS, and that NPS remove tule elk from the pastoral zone, ensuring via fencing or other means that the elk do not repeat their encroachment onto the historic ranching area. Additionally, our organizations ask that in developing a GMP amendment, NPS remain mindful of the beneficial and historic nature of the ranches at PRNS, which Congress sought to preserve when it established the PRNS. Given the importance of these ranches for land stewardship and the local economy, as well as the thin profit margins ranchers operate within, we ask that NPS seek to ensure operational flexibility for the ranchers within the GMP amendment.

Our organizations have carefully reviewed the initial alternatives advanced by the NPS in its GMP Amendment Newsletter. In the comments that follow, we outline the policy considerations that ultimately favor adoption under the GMP amendment of a modified version of the "Continued Ranching and Removal of the Drakes Beach Tule Elk Herd" alternative, an analysis of why the required Settlement Alternatives should ultimately be disfavored in the GMP amendment, and various considerations that NPS should fully explore in future scoping/EIS documents.

DAVE DALEY
PRESIDENT
OROVILLE

ROB VON DER LIETH
TREASURER
COPPEROPOLIS

BILLY GATLIN
EXECUTIVE VICE PRESIDENT
HERALD

MIKE WILLIAMS
SECOND VICE PRESIDENT
ACTON

MIKE MILLER
SECOND VICE PRESIDENT
MT. HAMILTON

MARK LACEY
FIRST VICE PRESIDENT
INDEPENDENCE

MIKE SMITH
FEEDER COUNCIL CHAIR
SELMA

PAT KIRBY
SECOND VICE PRESIDENT
WILTON

TREVOR FREITAS
FEEDER COUNCIL VICECHAIR
TIPTON

SPECIFIC COMMENTS REGARDING THE “CONTINUED RANCHING AND REMOVAL OF THE DRAKE’S BEACH TULE ELK HERD” ALTERNATIVE

Our organizations’ preferred alternative is a modified version of the “Continued Ranching and Removal of the Drake’s Beach Tule Elk Herd” alternative. This alternative appropriately ensures the viability of ranches by providing 20-year leases, and ensures management of the tule elk herd at PRNS better than any of the other alternatives currently under consideration.

The GMP amendment should ensure 20-year (or longer) leases for ranchers

Our organizations are pleased that, under this alternative (as well as the NPS Initial Proposal), “existing ranch families would be authorized to continue beef cattle and dairy ranching operations under agricultural lease/permits with 20-year terms” and that those permits “would identify authorized measures for operational flexibility and diversification.” Any PRNS GMP amendment ultimately finalized by NPS should absolutely prioritize long-term leases for ranchers at PRNS.

Cattle ranchers, including those at PRNS, strive to be good stewards of the land, water, and wildlife resources. However, short-term leases stymie efforts at good stewardship. With short-term leases, ranchers are unable to obtain external financing for ranch improvements that could benefit the land. Additionally, without any intermediate- or long-term certainty regarding the continuation of ranching permits, ranchers are hesitant to invest their own capital in ranch improvements, as there is no assurance that they will see returns on those investments. Long-term leases will enable ranchers to obtain financing and see returns on their own investments, incentivizing good stewardship practices and benefitting both the rancher and the unique environment of the PRNS.

The solution to environmental concerns at PRNS is not to eliminate or reduce ranching, but to provide the Seashore’s ranchers with operational security that will allow them to invest in improvements benefitting the ranch, the land, the water, and the Seashore’s unique wildlife.

The GMP amendment should prioritize removal of tule elk from the pastoral zone

In 2014 comments addressing the now-abandoned PRNS Ranch Comprehensive Management Plan process, CCA addressed the need for removal of tule elk from the pastoral zone:

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

As elk eat grass intended for cattle forage, ranchers have no option but to purchase supplemental feed to sustain their cattle. This can be extremely costly for the rancher. . . .

California's cattle ranchers already operate on exceedingly thin margins—most do it not because it turns any substantial profit, but because it is a way of life they cherish and which is rooted in long-standing family tradition. Elk foraging in the pastoral zone places an additional financial burden upon these producers, threatening their very livelihood and way of life. Additionally, by presenting them with an economic burden not faced by other ranchers throughout the state and nation, this foraging by tule elk puts the ranchers in the PRNS at a competitive disadvantage over other ranchers throughout California and the United States.

For those ranches certified organic, these incursions can also threaten their organic status. This is particularly troubling given the increased time, effort, and expense incurred by those ranchers who choose to serve their customers by certifying organic.

Finally, tule elk impact the grazing standards for permittees at PRNS. Through no fault of their own, and regardless of livestock management practices, ranchers may exceed the PRNS grazing standard of 1200lbs[/acre] of residual dry matter left on pastures prior to the rainy season when elk routinely graze the areas.

To ensure that historical ranching remains viable within the pastoral zone, as Congress intended, we urge NPS to take immediate action to remove elk from the pastoral zone and to ensure that elk do not return to the pastoral zone. This may involve bolstering fence lines separating the Phillip Burton Wilderness Area from existing ranches within PRNS.¹

While the “Continued Ranching and Removal of the Drakes Beach Tule Elk Herd” alternative envisions removal of the Drake’s Beach herd, such management is insufficient. It is not enough that NPS *could* additionally “implement actions to manage tule elk from the Limantour-Estero Road herd on the ranchlands” under this alternative; the NPS *must* manage the Limantour elk to keep them from straying into the pastoral zone, whether by bolstering fence lines separating the Phillip Burton Wilderness Area from the ranches within the pastoral zone or via other means.

It is also essential that the NPS carefully analyze the Phillip Burton Wilderness Area’s carrying capacity for tule elk (factoring in available forage and water) as a basis for establishing a reasonable population limit for the elk, and that NPS develop a detailed plan for managing the elk population to ensure that it does not exceed that population limit. Any population limit should be conservative in nature, accounting for a wide variety of environmental factors that could impact the elk population, including the likelihood of future drought conditions in the region. Such management would avoid future losses of tule elk such as that experienced from 2014-2015 due to California’s historic drought.

ANALYSIS OF ALTERNATIVES REQUIRED BY THE SETTLEMENT AGREEMENT

While our organizations appreciate that the NPS is required by the Settlement Agreement resulting from the lawsuit *Resource Renewal Institute v. National Park Service* to consider the “No Ranching,” “No Dairy Ranching,” and “Reduced Ranching” alternatives within the GMP amendment process, there are numerous reasons that these three alternatives should ultimately be rejected. All three alternatives are inconsistent with both the Point Reyes National Seashore

¹ *Emphasis in original.*

Enabling Act and the Coastal Zone Management Act of 1972, and should thus be rejected as a matter of law. Additionally, all three alternatives would have devastating economic impacts throughout the region, and should be rejected as a matter of good policy.

The Settlement Agreement alternatives are contrary to laws governing the PRNS

Alternatives required by the Settlement Agreement are inconsistent with the Point Reyes National Seashore Enabling Act

The Point Reyes National Seashore Enabling Act states that the PRNS

shall be administered by the Secretary [of the Interior] without impairment of its natural values, in a manner which provides for such recreational, educational, *historic preservation*, interpretation, and scientific research opportunities as are consistent with, based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area²

Continuance of dairy and beef cattle ranching at the PRNS is essential to historic preservation of the PRNS because ranching is part of the very fiber of the Point Reyes peninsula. Cattle were grazed at Point Reyes as early as 1820, when the longhorn cattle of a Spanish Franciscan Mission at San Rafael roamed the peninsula.³ When the missions were dismantled, ownership of land was established by Mexican land grants, and the grantees of these *ranchos* continued to graze cattle on the peninsula (for instance, former Mexican Army corporal Rafael Garcia grazed 3,000 head of cattle at the peninsula).⁴ After California's acquisition by the United States, many *rancheros* sold their lands to American entrepreneurs. By the 1930s, ownership had largely stabilized; many of those ranching families continue to ranch at Point Reyes today.

Beef cattle and dairy ranching are fundamental to the history of the Point Reyes peninsula, and it is precisely these historic uses that the Point Reyes National Seashore Enabling Act sought to preserve. Any alternative which eliminates or reduces historic ranching at the PRNS, then, would violate the spirit, if not the letter, of the law which paved the way for the creation of the PRNS.

Alternatives required by the Settlement Agreement are inconsistent with the Coastal Zone Management Act of 1972

Though federal lands such as the PRNS and GGNRA are excluded from the "coastal zone" under the Coastal Zone Management Act of 1972,⁵ the "federal consistency" provision of the Act nevertheless states that "Each Federal agency activity within or outside the coastal zone that affects any land or water use or natural resource of the coastal zone shall be carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved State management programs."⁶

² Point Reyes National Seashore Enabling Act, 16 U.S.C. § 459c-6(a).

³ D.S. LIVINGSTON, RANCHING ON THE POINT REYES PENINSULA: A HISTORY OF THE DAIRY AND BEEF RANCHES WITHIN POINT REYES NATIONAL SEASHORE, 1834-1992 at 1 (National Park Service 1993).

⁴ *Id.* at 6.

⁵ Coastal Zone Management Act of 1972 § 304(1), 16 U.S.C. § 1453(1).

⁶ *Id.* at 16 U.S.C. § 1456(c)(1)(A).

As detailed in Unit II of the Marin Local Coastal Program approved by the California Coastal Commission in 1981,⁷

The [California] Coastal Act strongly supports the preservation of agricultural lands in productive agricultural use and strictly controls the conversion of agricultural lands to other uses. Agricultural land uses are given priority over many other []use[s] in the coastal zone, including visitor-serving development. . . .

. . . .
Because of the Coastal Act's strong support for preserving agricultural lands and the important role which agriculture in the parks plays in Marin's agricultural economy, ***the LCP recommends that agriculture in the GGNRA and PRNS be encouraged*** and carefully monitored to avoid adverse impacts on natural resources and public recreation. Where conflicts arise between agriculture and public park uses, they should be resolved so as to protect resources and public safety ***while still allowing the continuation of the agricultural operation***. Regarding existing leases, the LCP recommends that they be reviewed five years prior to expiration for compatibility with park goals, and revised as necessary. ***To provide greater security to agricultural operations, long-term lease arrangements and automatic lease renewal provisions are recommended*** if all terms and conditions of a lease are met. Uniform procedures and standards should be established by the National Park Service to deal with all agricultural tenants.⁸

The GMP amendment conducted by NPS is a federal agency activity which effects land use and natural resources within California's coastal zone, and thus must be "consistent to the maximum extent practicable with the enforceable policies of approved State management programs." As demonstrated above, the "No Ranching" alternative, "No Dairy Ranching" alternative, and "Reduced Ranching" alternative would *not* be "consistent to the maximum extent practicable" with the policies outlined in the Marin Local Coastal Plan approved by the California Coastal Commission because it would not encourage agriculture at GGNRA and PRNS nor continue existing agricultural operations.

All three settlement alternatives fail to uphold federal consistency with state-approved coastal management plans in accordance with the Coastal Zone Management Act of 1972. The Draft EIS should fully examine the interrelationship between the Settlement Agreement alternatives and all local, state, and federal laws and regulations governing the portions of PRNS and GGNRA within the coastal zone.

The Settlement Agreement alternatives would be devastating to Marin County's economy, with impacts reverberating throughout the State of California

According to the Marin County Board of Supervisors, the ranches at PRNS account for nearly 20% of agricultural production in Marin County, a direct production value of \$20 million. A 2009 analysis by U.C. Cooperative Extension found that ranches at PRNS and GGNRA

⁷ Though Marin County and the California Coastal Commission have been in the process of developing a Local Coastal Plan Amendment since 2008, this process has yet to be finalized, and thus the Local Coastal Plan approved in 1981 appears to still be operative (*see, generally* Local Coastal Program Background, Frequently Asked Questions, *available at* <https://www.marincounty.org/depts/cd/divisions/planning/local-coastal-program/lcp-background>).

⁸ MARIN COUNTY LOCAL COASTAL PLAN UNIT II – AMENDED 56-57 (1981) (*emphasis added*).

directly provide 65 jobs, and provide livelihoods for another 25 ranch family members. The presence of these ranches supports local schools, churches, and businesses.

Should these ranches be “phased out” under the “No Ranching” alternative or be reduced in number under either the “No Dairy Ranching” or “Reduced Ranching” alternatives, Marin County would be deprived of the economic benefits of these ranches, resulting in a loss of 20% of the County’s agricultural production and devastating the local businesses that rely on the presence of the ranches and ranchers.

Any consideration of the Settlement Agreement alternatives in the Draft EIS should fully consider the direct and indirect economic impacts that such alternatives would have upon the Seashore, Marin County, and California.

Specific comments regarding the “Reduced Ranching and Management of the Drakes Beach Tule Elk Herd” alternative

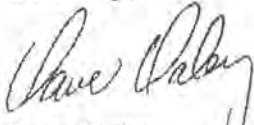
The “Reduced Ranching and Management of the Drakes Beach Tule Elk Herd” alternative detailed in the GMP Amendment Newsletter states that “The areas identified for closure of ranch operations [under this alternative] would minimize the overall impact on the Point Reyes Peninsula Dairy Ranches and Olema Valley Dairy Ranches Historic Districts, both of which are eligible for listing on the National Register of Historic Places.” The “Ranching Background” section of the GMP Amendment Newsletter, however, suggests that these districts have been determined eligible for nomination to the National Register of Historic Places in part *because* of the “active beef cattle and dairy operations that occur” in those districts.

To reduce the dairy and beef cattle ranching activities that occur in these districts would be to deprive the districts of the very history that has rendered them historic in the first place. Consequently, this alternative should be rejected.

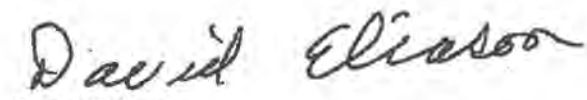
Conclusion

CCA, PLC, and NCBA appreciate the opportunity to provide initial comments on the GMP amendment for the Point Reyes National Seashore, and thank NPS for their efforts. We look forward to continued communication with NPS as it develops its Draft EIS—and ultimately a final GMP amendment—for the Point Reyes National Seashore.

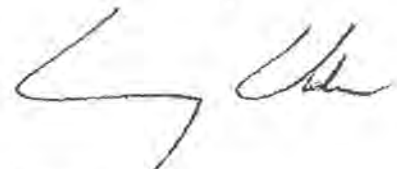
Sincerely,



Dave Daley
President, California Cattlemen’s Association



David Eliason
President, Public Lands Council



Craig Uden
President, National Cattlemen’s Beef Association

November 15, 2017

HAND-DELIVERED

Acting Superintendent Cynthia MacLeod
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

RECEIVED
2017 NOV 22 AM 9:58
POINT REYES NS

Re: Request for Comments on Alternatives for a GMP Amendment

Dear Acting Supt. MacLeod:

Statutory Background

Your request for comments on a conceptual range of alternatives for a General Management Plan Amendment is extremely disappointing. It reads like a re-shuffled version of your unlawful ranch management plan proposal and, like the ranch plan proposal, it ignores your statutory duty for management of the two parks. Furthermore, the fact that you have identified your ranch plan proposal at this early stage as your "initial proposal" for how these 28,000 acres of land should be managed shows a bias, or pre-judgment, in favor of ranching before the GMP planning process has even begun.

Under the court settlement (and applicable law), you are supposed to be conducting a public process under your GMP statute to objectively determine the best use of these 28,000 acres. In doing so, you must adhere to the laws applicable to the two parks which require that the lands be managed first and foremost to protect their natural resources. You ignore this.

According to your planning procedures, a GMP begins with a Foundation Statement.

The Foundation Statement - The planning process begins with the development of a foundation statement that is based on the park's enabling legislation . . . and that documents the park's purpose, significance, fundamental resources and values, and primary interpretive themes. It also includes any relevant laws . . . that apply to the national park system or the individual park unit. The foundation statement is generally developed early, as part of the public and agency scoping and data collection for the [GMP].¹

Director's Orders 2.2. (Emphasis added.)

¹ I assume you are doing the required foundation statement and you will make it part of the public scoping process, as required. I look forward to reviewing it and commenting.

The “relevant laws” in this case are the PRNS statute, the GGNRA statute and the Organic Act. The parts of those laws that actually control what you can do (and not do) going forward are relatively short.²

The Point Reyes National Seashore legislation provides, in pertinent part, as follows:

§ 459c-6. Administration of property

(a) Protection, restoration, and preservation of natural environment

Except as otherwise provided in sections 459c to 459c-7, . . . the property . . . shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with . . . the maximum protection, restoration, and preservation of the natural environment within the area, subject to the provisions of sections 1, 2, 3, and 4 of this title . . . and in accordance with other laws of general application relating to the national park system as defined by sections 1b and 1d of this title....³

16 U.S.C. § 459c-6. (Emphasis added.)

The GGNRA legislation provides, in pertinent part, as follows:

§460bb – Establishment

In the management of the recreation area, the Secretary . . . shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.

16 U.S.C. § 460bb. (Emphasis added.)

² Needless to say, you would have to comply with these laws regardless of what a Foundation Statement might say.

³ From the quoted language it is clear that the Park Service is required by law to manage the park in such a way as to not cause “impairment of its natural values.” The law goes on to make clear that even traditional uses of national parks, namely “recreational, educational, historic preservation, interpretation, and scientific research opportunities” are allowable [only] to the extent “consistent with . . . the maximum protection, restoration, and preservation of the natural environment within the area” The highest priority is to not impair natural values. Recreation, education, historic preservation, etc. are all subject to that highest priority.

The Organic Act provides, in pertinent part, as follows:

§ 100101 (a) In General-

The Secretary . . . shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

54 U.S.C. § 100101(a). (Emphasis added.)

These three laws make clear that your overarching management obligation is to protect the natural resources of these park units. While I think it is implied in all three laws, Congress even specifically ordered the "maximum . . . restoration . . . of the natural environment" in the seashore statute. Ranching, on the other hand, is discretionary. It can only be allowed to the extent it doesn't violate these statutes. Generally, ranching involves the subjugation of nature. As it is being practiced in the two parks, it can't be squared with your duty to protect and restore nature.

You should read these three laws again because their importance cannot be overstated. Their words control everything you might do that would have any effect on the lands and resources of each park.

While a Foundation Statement may contain more words, these three statutory provisions are the only words you are required to follow. Everything else you might do is discretionary (or unauthorized). Ranching is discretionary. That means it can only be allowed to the extent it doesn't run afoul of the three statutes quoted above. And let's be honest, ranching is extremely harmful to natural resources and that is prohibited by the three statutes. The Park Service has been violating these three statutes for as long as it has allowed ranching in the two parks.

Finally, instead of focusing on the question of whether these lands should continue in ranching or not, you are getting into details in the alternatives that are distracting and that should be decided later if ranching is the decision you make. Your planning procedures define a GMP as follows:

[A GMP] is a broad umbrella document that sets the long-term goals for the park based on the foundation statement. The [GMP] (1) clearly defines the desired natural and cultural resource conditions to be achieved and maintained over time; (2) clearly defines the necessary conditions for visitors to understand, enjoy, and appreciate the park's significant resources, (3) identifies the kinds and levels of management activities, visitor use, and development that are appropriate for maintaining the desired conditions and (4) identifies indicators and standards for maintaining the desired conditions.

Director's Orders 2.2. (Emphasis added.)

The question for this GMP is whether ranching should continue or whether the land should be allowed to return to a natural condition.

YOUR LISTED ALTERNATIVES

The alternatives (except no ranching) read like they were written by the ranchers. Furthermore, all of them (except no ranching) ignore the fact that ranching is prohibited if it harms natural resources. Some small amount of ranching at one location to demonstrate how ranching was conducted historically might be allowable, but turning over 28,000 acres to private ranching serves no park purpose and does tremendous harm to the parks' natural resources which you are obligated by law to protect and restore. In short, ranching doesn't trump protection and restoration of natural resources (including elk) as required by the laws you have a duty to carry out. To date, you and your predecessors have ignored this.

My comments on the alternatives are set forth below. With the exception of the first alternative, they should all be rejected as unlawful. You could try to develop one or more acceptable alternatives that begin with the requirement that management of the area will be done in strict accordance with the above statutes and with no harm to natural resources. However, it is virtually impossible to conduct profit-driven ranching without harming natural resources.

Alternative 1. No Ranching and Limited Management of Elk.

Under this alternative, you state that ranching would be phased out over a period of five years. However, ranching has already been extended five years for the planning period to decide if ranching should continue. I don't see why ranching should continue for five more years for a phase-out.

A. You state that the ranch lands would be converted from ranching to not-for-profit education, research, outdoor recreation and other opportunities. Even your alternative of "no ranching" is problematic. It is premature and unrealistic to envision that if ranching is removed the area should be converted to not-for-profit education, research, outdoor recreation activities and other opportunities. The most logical thing to consider is to let the 28,000 acres return to a natural condition, as in the elk reserve, with possible human assistance in removing non-native vegetation and planting native vegetation. This would be in keeping with your statutory management obligations, such as the duty to "preserve the recreation area . . . in its natural setting" and to provide "the maximum protection, restoration, and preservation of the natural environment within the [seashore] area."

B. You state that you would coordinate prescriptive grazing in priority areas to maintain native and rare plant communities. I assume this implies cattle grazing. Why are you so fixated on cattle? You work for the National Park Service, not the Bureau of Land Management. Rather than bringing in cattle to "maintain native and rare plant communities," you should let nature take its course and use other means, such as human labor (removing non-native plants and planting native plants), to restore the area to the natural environment it was before cattle were introduced, the vegetation types were thereby altered, the elk were shot, and the natural environment was, for the most part, wiped out. You have statutory obligations to, among other

things, “preserve the recreation area . . . in its natural setting” and to provide “the maximum protection, restoration, and preservation of the natural environment within the [seashore] area.”

C. The free-range elk herd would continue to expand with limited to no population management. If ranching is discontinued you should state here that the 8-foot fence separating the elk reserve and the ranches would be removed. There would no longer be any reason to keep the captive elk locked up.

D. You state you would “identify broad management strategies to preserve park resources” The first broad management strategy to preserve park resources would be the end of ranching. But you need to do more. Ranching has destroyed these 28,000 acres. You have a duty to restore these lands and their natural resources. This includes, among other things, removing non-native vegetation and planting native vegetation.

Alternative 2. No Dairy Ranching and Management of the Drakes Beach Elk Herd.

Under this alternative, dairy ranching would be stopped and the dairies would be allowed to convert to beef cattle operations. You don’t state any benefit, but damage from cattle would be reduced because milk cows damage the environment more than beef cattle. Also, Johne’s disease would be greatly reduced because it is most prevalent in dairy herds.

A. You state that the beef cattle (and former dairy) ranches would be given 20-year leases. You can’t state that beef ranching would continue (including on former dairy lands) and that 20-year leases would then be issued to all ranchers because you don’t know now that that would comply with your obligations under the three laws above that you are required to follow. Ranching is harming the natural resources of the parks just as grazing is harming the natural resources of BLM and Forest Service lands. There is evidence of that harm all over the parks. You are required to administer the lands in such a way that protection of natural resources is your overarching goal.

B. You state that the leases “would identify authorized measures for operational flexibility and diversification and to establish [sic] programmatic approaches for streamlined implementation of best management practices.” It is premature to propose that at this stage because you don’t know if doing so would violate your statutory duty to protect natural resources, just as you don’t know if ranching in the first place would violate your statutory duty. You don’t explain what these words and phrases mean so the public can’t comment on them. While I don’t know what most of the words mean, because you haven’t explained them, I assume diversification means what it meant in the ranch management plan. Allowing any livestock on these ranches smaller than cattle, such as pigs, sheep, goats, as well as free-roaming turkeys, chickens, geese, ducks etc. will create extreme predator conflicts that will result in killing of predators or harming them directly or indirectly, in violation of your statutory duty to protect natural resources, including wildlife. It will also require much more restrictive fencing that will reduce wildlife habitat and restrict wildlife movement. Allowing the planting of row crops will also cause problems to natural resources, including, but not limited to, reduced habitat for wildlife; the use of fencing that is

more impermeable to wildlife travel than the current barbed wire fencing which will further impede wildlife travel across thousands of acres of land; and the use of herbicides and pesticides, including dangerous chemicals injected into the ground where artichokes⁴ and certain other crops are grown and which may then enter the groundwater of the park.⁵ Any other diversification ideas are also contrary to the three statutes above.

C. You state that the “Drakes Beach tule elk population would be managed at a level compatible with authorized beef cattle ranching operations.” You make a similar statement regarding the Limantour - Estero Road herd. You are basically saying that ranching trumps the “protection, restoration and preservation” of elk (and other natural resources). It doesn’t. All Park Service employees should know that based on the Organic Act. Furthermore, you should know that even more so because of the language quoted above from your seashore statute. Apparently, you are not alone in not knowing that your primary duty is to protect nature. In his book “Preserving Nature in the National Parks,” retired NPS employee Richard Sellars writes that the Park Service has never protected nature, in spite of its Organic Act. According to Sellars, at its core the Park Service has never been more than a tourist agency, in spite of its mandate to protect natural resources. It should also be kept in mind that tule elk are not abundant. Their numbers today are not much above the level that was protected under the Endangered Species Act a few decades ago. They are not that much better off, numbers-wise, than the California sea otter, which is still protected under the Endangered Species Act.

D. You state you would “identify broad management strategies to preserve park resources” The first broad management strategy to preserve park resources is to end ranching. But you need to do more. Ranching has destroyed the ranching lands. You have a duty to restore these lands and their natural resources. This includes, among other things, removing non-native vegetation and planting native vegetation.

Alternative 3. Reduced Ranching and Management of the Drakes Beach Tule Elk Herd.

Under this alternative, ranching would be reduced by 7,500 acres. Another alternative would be to combine your alternatives 2 and 3.

A. You state that the areas you would close have been selected to minimize the overall impact on the Point Reyes Peninsula dairy ranches and the Olema Valley dairy ranches historic districts. This means no consideration was given to what reductions would be best for carrying out your statutory duty to protect the natural resources of the 28,000 acres which is your first obligation. Your focus is on what is best for ranching, as was the case in the ranch management plan.

⁴ While the ranchers have mentioned artichokes as a possible row crop, it is likely that some will want to grow wine grapes and, to the extent it is now legal in California, marijuana. Each is far more profitable than artichokes. This comment applies to all your alternatives, except the no ranching one.

⁵ Speaking of groundwater, you should investigate and discuss how much groundwater would be needed to irrigate each type of row crop.

B. You state that most of the areas to be closed don't have developed ranch complexes or residential use and will thus have the least impact on ranching. Again, this shows a bias toward continuing ranching and disregard for your statutory duty of protecting natural resources above all else.

C. You state that the remaining 20,000 plus acres would be leased for 20-year terms. You can't state that ranching would continue and 20-year leases would be issued to all ranchers because you don't know now that that would comply with your obligations under the three laws above that you are required to follow. Ranching is harming the natural resources of the parks just as grazing is harming the natural resources of BLM and Forest Service lands. There is evidence of that harm all over the parks. You are required to administer the lands in such a way that protection of natural resources is your one overarching goal.

D. You state that the leases "would identify authorized measures for operational flexibility and diversification and to establish [sic] programmatic approaches for streamlined implementation of best management practices." It is premature to propose that at this stage because you don't know if doing so would violate your statutory duty to protect natural resources, just as you don't know if ranching in the first place would violate your statutory duty. You don't explain what these words and phrases mean so the public can't comment on them. While I don't know what most of the words mean, because you haven't explained them, I assume diversification means what it meant in the ranch management plan. Allowing any livestock on these ranches smaller than cattle, such as pigs, sheep, goats, as well as free-roaming turkeys, geese, chickens, ducks etc. will create extreme predator conflicts that will result in killing of predators or harming them directly or indirectly, in violation of your statutory duty to protect natural resources, including wildlife. It will also require much more restrictive fencing that will reduce wildlife habitat and restrict wildlife movement. Allowing the planting of row crops will also cause problems to natural resources, including, but not limited to, reduced habitat for wildlife; the use of fencing that is more impermeable to wildlife travel than the current barbed wire fencing which will further impede wildlife travel across thousands of acres of land; and the use of herbicides and pesticides, including dangerous chemicals injected into the ground where artichokes and certain other crops are grown, which may then enter the groundwater of the park. Any other diversification ideas are also contrary to the three statutes above.

E. You state that the "Drakes Beach tule elk population would be managed at a level compatible with authorized ranching operations." You make a similar statement as to the other wild herd, the Limantour/Estero Road herd. You're not paying attention to your statutory obligations. The obligation to protect and restore natural resources, including wildlife such as elk, trumps commercial ranching which can only be allowed by you if it doesn't harm natural resources. Ranching is harming natural resources. Elk are the statutorily protected animal, not cattle. How can you justify ranching, which is not required in the Seashore, with reducing elk numbers which you have a statutory duty to protect, restore and preserve? You can't.

F. You state you would "identify broad management strategies to preserve park resources"

The first broad management strategy to preserve park resources is to end ranching. But you need to do more. Ranching has destroyed the ranching lands. You have a duty to restore these lands and their natural resources. This includes, among other things, removing non-native vegetation and planting native vegetation.

Alternative 4. Continued Ranching and Management of Drakes Beach Elk Herd (NPS Initial Proposal).

Under this alternative, ranching would continue and the ranchers would be given all that they asked for with the Ranch Management Plan, except elk would be managed, not totally eliminated. This was your preferred alternative under the Ranch Management Plan.

A. You state that ranching would continue and the ranchers would be given 20-year leases. You can't state that ranching would continue and that 20-year leases would be issued to all ranchers because you don't know now that that would comply with your obligations under the three laws above that you are required to follow. Ranching is harming the natural resources of the parks just as grazing is harming the natural resources of BLM and Forest Service lands. There is evidence of that harm all over the parks. You are required to administer the lands in such a way that protection of natural resources is your overarching goal.

B. You state that the leases "would identify authorized measures for operational flexibility and diversification and to establish [sic] programmatic approaches for streamlined implementation of best management practices." It is premature to propose that at this stage because you don't know if doing so would violate your statutory duty to protect natural resources, just as you don't know if ranching in the first place would violate your statutory duty. You don't explain what these words and phrases mean so the public can't comment on them. While I don't know what most of the words mean, because you haven't explained them, I assume diversification means what it meant in the ranch management plan. Allowing any livestock on these ranches smaller than cattle, such as pigs, sheep, goats, as well as free-roaming turkeys, geese, chickens, ducks etc. will create extreme predator conflicts that will result in killing of predators or harming them directly or indirectly, in violation of your statutory duty to protect natural resources, including wildlife. It will also require much more restrictive fencing that will reduce wildlife habitat and restrict wildlife movement. Allowing the planting of row crops will also cause problems to natural resources, including, but not limited to, reduced habitat for wildlife; the use of fencing that is more impermeable to wildlife travel than the current barbed wire fencing which will further impede wildlife travel across thousands of acres of land; and the use of herbicides and pesticides, including dangerous chemicals injected into the ground where artichokes and certain other crops are grown, which may then enter the groundwater of the park. Any other diversification ideas are also contrary to the three statutes above.

C. Next you state that the "Drakes Beach tule elk population would be managed at a level compatible with authorized ranching operations." You go on to state that "[m]inimum and maximum population thresholds would be established" You add that you could also "implement actions to manage . . . the Limantour-Estero herd." You're not paying attention to

your statutory obligations. The obligation to protect and restore natural resources, including wildlife such as elk, trumps commercial ranching which can only be allowed if it doesn't harm natural resources. Elk are the statutorily protected animal, not cattle. How do you justify ranching, which is not required in the Seashore, with reducing elk numbers which you have a duty to protect, restore and preserve? You can't.

D. You state you would identify broad management strategies to preserve park resources" The first broad management strategy to preserve park resources is to end ranching. But you need to do more. Ranching has destroyed the ranching lands. You have a duty to restore these lands and their natural resources. This includes, among other things, removing non-native vegetation and planting native vegetation.

Alternative 5. Continued Ranching and Removal of the Drakes Beach Elk Herd (Ranchers Preferred Alternative).

Under this alternative, ranching would continue, but all the elk would be "removed" (likely by shooting because they have acquired Johnne's disease from the cattle and therefore can't be moved outside the seashore).

A. You state that ranching would continue and the ranchers would be given 20-year leases. You can't state that ranching would continue and that 20-year leases would be issued to all ranchers because you don't know now that that would comply with your obligations under the three laws above that you are required to follow. Ranching is harming the natural resources of the parks just as grazing is harming the natural resources of BLM and Forest Service lands. There is evidence of that harm all over the parks. You are required to administer the lands in such a way that protection of natural resources is your overarching goal.

B. You state that the leases "would identify authorized measures for operational flexibility and diversification and to establish [sic] programmatic approaches for streamlined implementation of best management practices." You can't propose that at this stage because you don't know if doing so would violate your statutory duty to protect natural resources, just as you don't know if ranching in the first place would violate your statutory duty. You don't explain what these words and phrases mean so the public can't comment on them. While I don't know what most of the words mean, because you haven't explained them, I assume diversification means what it meant in the ranch management plan. Allowing any livestock on these ranches smaller than cattle, such as pigs, sheep, goats, as well as free-roaming turkeys, geese, chickens, ducks etc. will create extreme predator conflicts that will result in killing of predators or harming them directly or indirectly, in violation of your statutory duty to protect natural resources, including wildlife. It will also require much more restrictive fencing that will reduce wildlife habitat and restrict wildlife movement. Allowing the planting of row crops will also cause problems to natural resources, including, but not limited to, reduced habitat for wildlife; the use of fencing that is more impermeable to wildlife travel than the current barbed wire fencing which will further impede wildlife travel across thousands of acres of land; and the use of herbicides and pesticides, including dangerous chemicals injected into the ground where artichokes and certain other crops

are grown, which may then enter the groundwater of the park. Any other diversification ideas are also contrary to the three statutes above.

C. You state that the “Drakes Beach tule elk population would be “removed” (presumably shot) using methods established through this planning process.” You’re not paying attention to your statutory obligations. The obligation to protect and restore natural resources, including wildlife such as elk, trumps commercial ranching which can only be allowed if it doesn’t harm natural resources. Elk are the statutorily protected animal, not the cattle. You can’t justify killing or otherwise removing all the Drakes Beach elk for the benefit of ranching when you have a statutory duty toward the former and no duty toward the latter.

D. You state you “would identify broad management strategies to preserve park resources” Let me get this straight. You’re saying that after you shoot all the elk you would then identify broad management strategies to preserve park resources? I’m at a loss for words.

The first broad management strategy to preserve park resources is to end ranching. But you need to do more. Ranching has destroyed the ranching lands. You have a duty to restore these lands and their natural resources. That includes, among other things, removing non-native vegetation and planting native vegetation.

Alternative 6. Continue Current Management (No action alternative).

Under this alternative, you state that ranching would go on as it has in recent years under short term leases or permits of 5 to 10 years.

While continuing current ranching could be an alternative, it isn’t the same as no action. If you take no action, ranching would end with the expiration of the current 5-year leases. No action is essentially the same as your first alternative. If you mean to say that ranching would continue as it has been conducted for many years, you can’t really state that because you don’t know now that that would comply with your obligations under the three laws above that you are required to follow. Ranching is harming the natural resources of the parks just as grazing is harming the natural resources of BLM and Forest Service lands. There is evidence of that harm all over the two parks. You are required to administer the lands in such a way that protection of natural resources is your overarching goal.

Alternative 7. [Additional Alternative.] Manage the lands with protection, restoration and preservation of natural resources as the overarching priority. Ranching only allowed to the extent it causes no harm to natural resources.

All of your conceptual alternatives violate your statutory responsibilities, except the no ranching one. While I favor elimination of ranching because it doesn’t belong in a national park and can’t be conducted without harming natural resources, you could try to develop an alternative that would be closer to meeting your statutory obligations. It would have to start with the assumption

that the three statutes above apply and that therefore protection of all natural resources limits what can be done ranching-wise.

NPS Questions on page 12 for consideration by the public as it prepares its comments:

1. “How can Point Reyes protect and manage the diverse and important natural and cultural resources in the planning area? Are there opportunities that could enhance future stewardship in the planning area”?

Your statutory duty is to protect, restore and preserve the natural resources of the area.

2. “What types of visitor experiences, activities, and facilities should be available in the planning area”?

Your statutory duty is to protect, restore and preserve the natural resources of the area. After ranching is ended, consideration can be given to more specific uses in implementation plans.

3. “What types of specific strategies can/should be considered for managing agricultural lease/permits”?

Your statutory duty is to protect, restore and preserve the natural resources of the area. You should end ranching. You can't manage these lands and their natural resources in the way you are required to do and still allow ranching.

4. “What types of specific strategies can/should be considered for managing tule elk”?

Your statutory duty is to protect, restore and preserve the natural resources of the area. You have very little discretion here. You have to manage the elk in a way that is best for the elk. You can't do anything that would favor ranching that would harm elk in any way.

Additional Comments

Impacts of Ranching and Cattle Grazing

Cattle grazing causes significant impacts to the environment including, but not limited to, compression of soil due to the heavy weight of cattle; erosion of soil and faster runoff of rainwater due to that compression (and overgrazing), especially in hilly areas where cattle make deep trails; damage to plant life by overgrazing and trampling; conversion of native plants to non-native plants; damage to water quality; damage to air quality and concomitant increase in global warming; and harm to all forms of wildlife, including endangered and threatened species. As for wildlife, some of the ways ranching and cattle harm or kill wildlife are as follows: overgrazing; using fencing that is not “wildlife friendly;” disposing of manure by spraying it on pastures which can infect elk and deer with Johne's disease;⁶ pollution of streams and bays;⁷ and the mowing of silage in the spring which kills any ground-nesting or near-ground-nesting birds.

⁶ Johne's disease exists in some of the cattle herds in the seashore and, probably, the recreation area. It has been infecting the elk in the seashore since they were introduced. The Park Service should establish a rigorous five year program to eliminate Johne's disease,

Furthermore, most of the cattle in the seashore are dairy cows. Dairy farming has much greater impacts on the environment than beef cattle ranching, including, but not limited to, greater forage consumption, greater water consumption, greater manure production (and related greater collection and disposal problems), greater methane gas production, greater water pollution, greater trampling of vegetation and soils due to the fact that milk cows tend to not go any farther than necessary to graze given the need to return to the milk barn two to four times (round trips) per day, and greater erosion due to cattle making those two to four round trips per day to and from the milk barn, especially when they travel through hilly areas and create deeply rutted trails on slopes.

On most federal public lands grazing occurs for only a portion of the year and is limited to beef cattle. The rest of the year the cattle are on private ranch lands. In the seashore and the recreation area the grazing is year-round. Plus, the ranches themselves are on park lands and they can occupy many, many acres.

Attached hereto as Exhibit A, and incorporated herein by reference, is a declaration signed by me and filed in the Resource Renewal Resource v. National Park Service litigation which resulted in the settlement providing for the subject GMP Amendment. It sets forth some of the impacts I have seen from ranching in the seashore.

Need for Impact Studies

Given the many kinds of impacts ranching is having on the lands in these two parks, you will need to do scientific studies to assess those impacts in detail in order to make any decisions on whether and to what degree any ranching can be allowed.

Succession

While not mentioned in your 12-page request for comments, it is common knowledge that the ranchers want some kind of right of succession so that when a lessee dies his heirs have a right to succeed him as lessees and when those heirs die their heirs succeed them as lessees and so on in perpetuity. There is no right to succession currently and the Park Service should not attempt to create one. When a lessee dies, the land should be returned to a natural condition for national park purposes. Moreover, while the Park Service has the authority to lease land for ranching, where “appropriate” (no harm to natural resources), it doesn’t have the authority to create any rights in land other than leases.

including testing and culling. See <https://johnes.org/general/control.html>

⁷ While the pollution of Tomales Bay and Drakes Bay due to seashore and recreation area ranching is well known, there are other areas in the two parks that are heavily polluted from ranching that aren’t well known. One example is Kehoe Creek.

Charging Fair Rental Amounts

The park has been leasing the ranches at well below fair market rental value. That is unlawful. Federal officials have an obligation to collect fair market value for all federal assets. The difference between fair rental value and actual lease amount constitutes an unauthorized gift by the federal official who signs each lease. You should be obtaining the same rent amount as comparable ranch lands rent for outside the parks. The rationales the seashore has been using for subsidizing ranching are unsupported.

Failure to Monitor Unlawful Grazing Numbers

It is widely believed that some ranchers have more cattle than allowed under their leases. The Park Service readily admits it doesn't do livestock counts. However, it could do livestock counts and, as trustee of these public lands, it should do such counts. As a private individual, I don't have the wherewithal to do such counts, but I have seen one instance where there were clearly more livestock than allowed. Attached hereto as Exhibit B, and incorporated herein by reference, is an April 18, 2017, email I sent to Superintendent Cicely Muldoon enclosing a photo of 42 sheep on the M (Grossi) Ranch that I took on April 15, 2017. In the email I stated that the photo showed 42 sheep and that the M Ranch lease only authorized 5 sheep for personal use (in addition to the number of cattle it was authorized). In the email I asked Supt. Muldoon if the seashore would "require the immediate removal of the excess sheep and provide some penalty commensurate with the violation of the lease term and the overgrazing." I also stated that the overstocking "underscores the concern of many people that some ranchers are grazing more cattle than their leases/permits allow." Ms. Muldoon never responded. Also attached to Exhibit B is a photo taken on August 16, 2017, showing 25 sheep at the same location on the M Ranch. If the Park Service isn't enforcing sheep numbers, it's reasonable to assume it isn't enforcing cattle numbers either.

Livestock Fencing

Livestock fencing (most commonly barbed wire) can kill and injure wildlife. However, it can be constructed to be much less harmful to wildlife. Such fencing is commonly referred to as "wildlife friendly." On BLM grazing lands where deer or elk exist the specifications are: three wires, top wire 38 inches above ground, bottom wire to be smooth wire (non-barbed) and 16 inches above ground (for fawns and elk calves to get under) and at least 12 inches clearance between the top wire and the middle wire (to prevent "scissoring" or trapping hind legs between the top two wires). Unfortunately, to the best of my knowledge, none of the fencing in the parks is wildlife friendly. Attached hereto as Exhibit C, and incorporated herein by reference, is an article I wrote about fencing in the seashore and how none of the fencing that I examined is "wildlife friendly." As long as there is any ranching in the parks, all fencing should be "wildlife friendly."

Miscellaneous Issues

In addition to the matters above, there are a number of other problems that stem from the ranches. Some are listed below. Each needs to be studied and information disclosed during the GMP process.

1. Frequent road trips by heavy milk trucks, tanker trucks filled with manure, and 18-wheel hay trucks do tremendous damage to roads and cattle guards in the ranching areas. It is believed the ranchers pay nothing toward such damage. They should. Please investigate and provide information for public comment.
2. Most, if not all ranches, especially the dairy ranches, have several housing units over and above the main ranch house. Some appear to be very substandard and may not meet basic housing requirements, including sanitation requirements. Please investigate and provide information for public comment.
3. As stated above, most, if not all ranches, especially the dairy ranches, have several housing units over and above the main ranch house. There are reports that some ranchers sublease those housing units to people who have nothing to do with the ranch's business. Such subleases are unauthorized. There are also reports that some ranches make substantial profits from charging employees and non-employees for these housing units. This is especially true because the ranchers in the parks pay roughly half what ranchers outside the parks pay for comparable ranch leases. Please investigate and provide information for public comment.

Conclusion

You are supposed to be starting a public and objective process to decide the best use of these 28,000 acres of land. It's basically a question of whether ranching, with all of its negative impacts on natural resources, should be allowed to continue or whether the land should be allowed to heal and return to a natural state. In that process you are required to follow the three statutes quoted at the beginning of my comments that require you to manage these lands with protection of natural resources as your primary duty. Based on your invitation for comment, I can't help but conclude that you have already decided in favor of ranching and its negative impacts to natural resources.

Sincerely,



James Coda

Enclosures

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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION

16 RESOURCE RENEWAL INSTITUTE, CENTER
17 FOR BIOLOGICAL DIVERSITY, and
18 WESTERN WATERSHEDS PROJECT,
19 Plaintiffs,
20 v.
21 NATIONAL PARK SERVICE, and CICELY
MULDOON, etc., et al.,
22 Defendants.

Case No. 4:16-cv-00688-SBA (KAW)
**DECLARATION OF JAMES CODA IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTIVE
RELIEF**

EXHIBIT A

1 I, James Coda, declare:

2 1. My name is James Coda and I live in Petaluma, California. The following facts are
3 personally known to me and if called as a witness I could and would testify truthfully thereto.

4 2. I am a member of the Center for Biological Diversity (CBD) and the Western
5 Watersheds Project (WWP) because I support the missions of both organizations and their work to
6 protect wildlife and public lands. I was a member of both organizations at the time the complaint in
7 this lawsuit was filed.

8 3. Before I retired, I was an Assistant U. S. Attorney in the Northern District of California
9 from 1990 to 2007. I handled cases primarily involving challenges to the way federal agencies
10 managed lands and resources and carried out their duties under laws such as the National
11 Environmental Policy Act, the Endangered Species Act and the Wilderness Act. I began my federal
12 career in 1970 as an attorney for the Department of the Interior in its headquarters in Washington, D.C.
13 I handled various matters for the Bureau of Land Management ("BLM"), including matters involving
14 the BLM grazing program. From early 1977 until late 1981, I was a member of the Interior legal office
15 in San Francisco where I worked primarily on matters involving the national parks in the western
16 region, including Point Reyes National Seashore. From 1983 to 1990, I was a civilian attorney for the
17 U.S. Navy, handling land and natural resource matters involving Navy and Marine Corps lands in the
18 Navy's western region.

19 4. When I retired in 2007, I began a new career in nature photography, with an emphasis
20 on photographing wildlife. After the first few years of traveling far to places rich in wildlife, I found
21 Point Reyes National Seashore ("Seashore" or "PRNS") to be a great place near home to photograph
22 wildlife such as tule elk, black-tailed deer, coyotes, bobcats, badgers, weasels, hawks, owls and other
23 birds.¹ Since 2010, I have visited the Seashore almost 90 times for the sole purpose of photographing
24 wildlife and derive great personal enjoyment and satisfaction from my visits. I have found that the two
25 best areas in the Seashore to find and photograph wildlife are the fenced elk reserve at the north end of
26 the Tomales Peninsula and the 18,000-acre commercial ranching area that the National Park Service

27
28 ¹ Images of some of the Seashore's wildlife are on my website in a portfolio entitled "Favorites - Point
Reyes." <http://www.jimcoda.com/>

1 (“Park Service” or “NPS”) leases to ranchers and calls the “pastoral zone.” This area is mostly open
2 country, and with its many roads I can scan wide areas looking for animals to photograph. During my
3 trips to the Seashore, I have come to know the pastoral zone well and have developed a great interest in
4 the well-being of the wildlife and other natural resources of the area.

5 5. It was not long after I began going to the Seashore that I began to notice that ranching
6 was causing harmful impacts to wildlife and other natural resources. I realized one serious issue is the
7 barbed wire fencing that runs along the roads in the pastoral zone and on ranches for pastures and
8 holding pens. While I have a right as a visitor to hike and visit pastures in the pastoral zone, fencing
9 along all the roads in the pastoral zone and the inside pasture fencing hinders my ability to hike and
10 photograph wildlife. This fencing harms my use and enjoyment of the Seashore because if I spot an elk
11 or some other animal that I want to photograph, I have to stay on the road-side of the fence or climb
12 over the fence. If the animal is too far away for a good photo, I give up and move on because climbing
13 fences is too risky to me and my clothing. Despite this harm to me, my primary concern is the impact
14 of barbed wire fencing on wildlife. Fencing forces wildlife to go over, under or through it. If fencing is
15 too high to clear or has too little clearance at the bottom for small animals, like deer fawns or elk calves
16 to go under, it can be harmful or even fatal. Barbed wire fencing is also not very visible and it can
17 injure or kill birds and mammals when they are flying or running and do not see the wires. Below is a
18 photo taken by my friend Daniel Dietrich on the Seashore’s D Ranch that exemplifies fencing that is
19 too high for a Tule elk to clear.



1 6. Another major problem with fencing at the Seashore is that there are significant amounts
2 of broken fences throughout the pastoral zone because wild or domestic animals damage them, wires
3 rust, and wooden posts rot below ground level. Poor maintenance of these fences is common, as some
4 broken fences have remained in place for years. Broken fences can kill or injure wildlife. I took the
5 photos below that exemplify the problem.



27 Below are two photos of a bull elk skull that was found on Mt. Vision above Home Ranch at the
28

1 Seashore. Note how the wire cut into the bridge of his nose and worked its way well into his lower
2 jaw. He could not eat or drink. He must have died a slow, agonizing death.



23 Seeing this skull and thinking about how the elk died troubles me, reinforces my concerns about vast
24 stretches of barbed wire fencing around cattle areas in the Seashore, and lessens my enjoyment of the
25 Seashore. Overall, I am very disturbed by the fact that the Seashore allows the ranchers to build fences
26 that act as serious barriers and dangers to wildlife.

1 7. As the preceding pictures highlight, one of my overarching concerns about Point Reyes
2 National Seashore is the Park Service's management of Tule elk and the impacts of ranching on the elk.
3 The return of Tule elk to the National Seashore is a shining story of success in wildlife restoration but it
4 is now being threatened by the Park Service's intention to issue a Ranch Management Plan ("RMP")
5 and long term commercial ranching leases. Tule elk are endemic to California and existed throughout
6 the Point Reyes Peninsula until uncontrolled hunting and ranching extirpated them from the area. *See*
7 Ex. A at 1²; Ex. B at 1.³ By 1870, Tule elk were almost extinct in the United States, with only a few
8 animals remaining under protection. *See* Ex. C at 4.⁴ In 1976, Congress passed a Joint Resolution
9 providing the United States would help in providing places on federal land for the elk to live and be
10 protected; the 71,000 acre Seashore was one of those places. In 1978, the Tule elk were reintroduced to
11 a 2,600 acre reserve in Tomales Point, at the North end of the Point Reyes National Seashore. Ex. C at
12 8. To prevent the elk from traveling southward and into the other ranches in the Seashore, NPS built a
13 tall woven wire fence across the Tomales Peninsula thereby creating a 2,600 acre holding area for the
14 elk and other wildlife. Ex. A at 2. Though they were few in number with ample forage for the tiny
15 herd, the elk failed to thrive in the reserve until the cattle were removed and the range conditions
16 improved. Ex. C at 8. After that the herd grew exponentially, and by 2007 leveled off at a census
17 averaging around over 450 animals. Ex. A at 1; Ex. B at 2. The Seashore is the only National Park
18 system unit in the United States where Tule elk can be seen, and they have become a major draw for
19 visitors from around the world. Ex. B at 2-3. As the Park Service itself proudly notes:

20 The majestic animals you see as you travel through the park embody the
21 restoration of the dominant native herbivore to the California coastal
22 ecosystem. They shape the landscape around them as they did for
23 centuries before they were extirpated by humans. They symbolize the
24 conservation of native species and ecosystem processes, one of the
25 primary missions of the National Park Service. The tule elk's presence is
26 treasured by visitors, photographers, naturalists, and locals alike.

25 ² Tule Elk, *The Return of a Species* at 1, available at
26 https://www.nps.gov/pore/planyourvisit/upload/resourcepaper_tuleelk.pdf.

27 ³ Tule Elk: Point Reyes National Seashore at 1, available at
28 www.nps.gov/pore/learn/nature/tule_elk.htm

⁴ Point Reyes National Seashore: 1998 Tule Elk Management Plan and Environmental Assessment at 4,
available at https://www.nps.gov/pore/learn/management/upload/planning_tule_elk_mp_ea_1998.pdf

1 Ex. B at 3.

2 8. I am concerned that the Park Service continues to keep the elk locked up behind a fence
3 at the reserve, even though the agency essentially said in its 1998 Tule Elk Management Plan that doing
4 so was wrong. In rejecting Alternative C (reducing the number of elk in the reserve and maintaining
5 them at a small remnant population size) one reason NPS gave was: "Overall, this alternative runs
6 counter to the NPS policy of not maintaining captive herds for the enjoyment of visitors but instead to
7 maintain wild populations within natural habitats." Ex. C at 54. In the Management Goals section of
8 the plan the third goal listed is to "[p]rovide for a free-ranging tule elk herd . . . by 2005." *Id.* at 40.
9 While NPS decided to adopt Alternative A at the time (keeping most of the elk inside the elk reserve's
10 8-foot high, woven-wire elk fence, but moving some elk to the wilderness area of the Seashore), the
11 Scientific Advisory Panel on Control of Tule Elk at Point Reyes wrote as follows:

12 6. The long-range goal of elk management at PRNS should be the reestablishment of
13 free-ranging elk throughout the Seashore and associated public lands. This would
14 involve . . . removal of the fence across Tomales Point. NPS and CDFG should develop
a long-range management plan with the goal of achieving a large, healthy, free-ranging
elk population subjected to a minimum of management intervention.

15 *Id.*, at 87-89. Alternative B of the 1998 Elk Plan would have implemented that. It would have
16 eliminated or reduced ranch leases and removed the elk fence or at least relocated it far south of its
17 current location. *Id.* at 51-52.

18 9. My concerns about the Park Service's management of the elk were underscored when
19 254 elk died of thirst in the elk reserve between 2013 and 2014. The Park Service staff knew, or should
20 have known, that the elk in the fenced reserve are mostly dependent on old cattle ponds and that the
21 ponds dry up to a large extent during droughts. Ex. C. at 12 (discussing this problem in the Seashore's
22 1998 Tule Elk Management Plan).

23 10. I am also concerned about NPS's recent shooting of numerous Tule elk to test for
24 Johne's disease, a deadly disease that cattle and elk can transmit to each other. The ten elk who were
25 introduced to the reserve did not carry Johne's disease, though five of the ten dairy herds at Point
26 Reyes, who were last tested in 1979, did. Ex. C at 14; *see also*, Ex D. at 2.⁵ NPS, which is under

27
28 ⁵ NPS Johne's Disease FAQs at 2, available at
https://home.nps.gov/pore/getinvolved/planning_tule_elk_johnes_disease_faq.htm

1 constant pressure from the ranchers to get rid of all the elk in the pastoral zone, has shifted from a
2 practice of collecting fecal samples to test whether any elk have Johne's disease, to a practice of
3 shooting elk to collect tissue samples. Between October 2015 and March 2016, NPS shot 26 elk. NPS
4 lets elk, which live from 10 to 20 years, suffer and die from the disease and shoots others randomly to
5 see if they have it, yet it does nothing to deal with the existence of the disease in the 5,000 to 6,000
6 cattle in the Seashore. To the extent the dairies have Johne's disease in the herds, they may infect any
7 ruminants, including wildlife like elk and deer, which spend time in fields where they spray liquefied
8 manure. While NPS has a statutory duty to protect the natural resources of the Seashore to the
9 maximum extent possible, which includes wildlife like Tule elk, and has no obligation to protect cattle,
10 NPS allows elk to be harmed or killed to protect cattle. The die-off of elk during the drought and these
11 shootings are very upsetting to me, and seriously interfere with my use and enjoyment of the Seashore.

12 11. One of my fears about the RMP process being completed before a new GMP is
13 completed is that it will result in the removal of some or all of the elk in the pastoral zone. Options
14 being considered include contraception, moving the elk out of the Seashore, which is unlikely due to
15 the fact that the pastoral zone elk have Johne's disease, and shooting the elk. Ex. E at 6-8. The Park
16 Service also is considering constructing another, even longer elk fence, where the wilderness area
17 meets the pastoral zone. *Id.* I am flabbergasted that the Park Service is considering these inhumane
18 and costly options to protect fourteen commercial cattle ranchers when the statutory mandate for
19 management of the National Seashore is to leave its natural resources unimpaired for the benefit of
20 future generations.

21 12. I am also concerned about a ranching practice NPS allows which kills birds. Silage
22 production is currently authorized by NPS in the Seashore on some ranches. Ranchers grow silage to
23 feed to their cattle when the green grasses are gone because growing it on site is cheaper than buying
24 feed offsite and having it trucked in. However, silage is cut during the spring when birds are nesting on
25 or close to the ground in the silage fields, so mowing silage can kill nesting birds. The Park Service
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1 commissioned a silage mowing study about the Seashore in 2015. Ex. F.⁶ The report noted: “Several
2 studies have found that the agricultural practice of mowing (whether for silage or hay) has detrimental
3 impact to breeding birds because nests, flightless young, and sometimes adults are destroyed . . .” *Id.*
4 at 14. The report also stated that prior to mowing, eight bird species were confirmed or suspected of
5 breeding in the silage fields. This report concerns me because it indicates silage mowing is another
6 example of NPS allowing ranching activities to threaten and kill wildlife.

7 13. Below is a photo taken by a member of plaintiff, Western Watersheds Project, of
8 portions of some of the Seashore’s silage fields (light areas in foreground and midground) which were
9 mowed in May 2016. Based on the silage study, it is reasonable to assume that all the nestlings and
10 some adults in those fields were killed when the fields were mowed. Public lands subject to the Park
11 Service’s “non-impairment” mandate should not be used to harm or kill birds for private gain.



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21 14. I am also concerned about the erosion that ranching causes, especially the trails cows
22 create on slopes. Continuing cattle use and rainfall cause soils to be washed away. Aside from the loss
23 of the soil, the erosion can cause problems for watercourses, including the living things that depend on
24 them. Soil loss cannot be restored quickly, so these impacts are long-lasting or irreversible. Below is a
25 photo I took on the J Ranch that shows how soil and water moves down slope to Tomales Bay.

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27 ⁶ Available at
28 https://www.nps.gov/pore/getinvolved/upload/planning_ranch_cmp_background_report_pointblue_impact_of_mowing_on_breeding_birds_150831.pdf.



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10 15. Given these widespread impacts of ranching on the environment and my use and
11 enjoyment of the Seashore, I am very concerned about the November 29, 2012, memorandum from
12 then-Secretary Salazar to the Director of NPS that declares there will be ranching for the next 20 years
13 because it has resulted in a pre-determined outcome for the Ranch Management Plan (“RMP”), which
14 will likely allow the harm ranching causes to my interests in wildlife and photography at the Seashore
15 to continue for the rest of my lifetime. In furtherance of the Secretary’s decision, on April 21, 2014,
16 the Superintendent of the Seashore, Cicely Muldoon, sent a letter to “Interested Parties” that the
17 Seashore was beginning a scoping process under the National Environmental Policy Act for a “Ranch
18 Comprehensive Management Plan/Environmental Assessment.” (“Ranch Management Plan” or
19 “RMP.”) The letter contained scoping questions for the public to address, but there was no scoping
20 question as to whether there should be continued ranching, as opposed to other alternatives, such as
21 allowing the land to heal and return to a natural condition and be like the rest of the seashore. Thus, any
22 land use except ranching is outside the scope of this planning process. I attended an NPS scoping
23 meeting in Sausalito during which NPS provided information including a handout regarding scoping, a
24 copy of which is attached as Exhibit G. I provided scoping comments by the deadline.⁷

25 16. In November 2014, NPS held two evening workshops regarding the proposed Ranch
26 Management Plan. I attended both. The first night addressed ranching practices and diversification.

27 ⁷https://www.nps.gov/pore/learn/management/upload/planning_ranch_cmp_scoping_comments_hardcopy.pdf, at 34, Correspondence. ID 1010.
28

1 The second night discussed various ways to get rid of some or all of the elk in the pastoral zone. NPS
2 provided a detailed handout, which is attached as Exhibit E.⁸ It includes virtually everything the Point
3 Reyes Seashore Ranchers Association listed in a 32-page comment letter in which they demanded 20-
4 year leases, diversification and removal of the tule elk from the pastoral zone.⁹ The ranchers want
5 “diversification” to (1) raise not only cattle, but also any livestock they choose, including, but not
6 limited to, pigs, sheep, goats, turkeys and chickens; (2) grow row crops on up to 15% of leased land;
7 (3) be free of limits on numbers of livestock that can be grazed; (4) do things that were allegedly
8 occurring in the 1800s such as vegetable packing facilities, butter churning facilities, cheese making
9 facilities, slaughterhouses, butchering and packing facilities; (5) process farm products brought in from
10 outside the Seashore; (6) have on-farm retail sales of farm products grown/raised on site and (7) sell
11 farm products brought in from outside the Seashore. Another thing they demanded was that the Park
12 Service remove all of the Tule elk from the pastoral zone. I am concerned that NPS will capitulate to
13 the ranchers’ demands in writing the Ranch Management Plan due to pressure from the ranchers and
14 their allies. I provided comments by the NPS deadline.¹⁰ Among the comments that I had then, many
15 of which I had raised in my scoping comments, was that NPS should do a General Management Plan
16 (“GMP”) first because it needs to make an informed decision on whether there should be ranching at all
17 and whether there should be wild, free-roaming elk in the ranching area/pastoral zone before preparing
18 a detailed plan on how ranching will be conducted and how elk will be removed from the pastoral zone.

19 17. Based on the Salazar Memorandum and the NPS statements during and about the RMP
20 process, I realized that NPS was ignoring the fundamental question of whether these lands should be
21 used for ranching or some other purpose and had already decided ranching would continue for another
22 twenty years. Moreover in a December, 6, 2013, article in the local paper, “Point Reyes Light,” about
23 the ranch planning process, NPS’s outreach coordinator for the Seashore was quoted as saying: “it’s not
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25 ⁸ https://www.nps.gov/pore/learn/management/upload/planning_ranch_cmp_update_111417.pdf
26 <https://parkplanning.nps.gov/document.cfm?parkID=333&projectID=51867&documentID=62540>

27 ⁹ [https://www.nps.gov/pore/learn/management/upload/planning_ranch_cmp_scoping_comments_hardco](https://www.nps.gov/pore/learn/management/upload/planning_ranch_cmp_scoping_comments_hardcopy.pdf)
27 [py.pdf](https://www.nps.gov/pore/learn/management/upload/planning_ranch_cmp_scoping_comments_hardcopy.pdf), at 213, Correspondence ID 3076.

28 ¹⁰ [https://www.nps.gov/pore/learn/management/upload/planning_ranch_cmp_workshops_public_comm](https://www.nps.gov/pore/learn/management/upload/planning_ranch_cmp_workshops_public_comment_analysis_150227.pdf)
28 [ent_analysis_150227.pdf](https://www.nps.gov/pore/learn/management/upload/planning_ranch_cmp_workshops_public_comment_analysis_150227.pdf). Page 30/A1-19.

1 an option for ranching not to continue.” Ex. H at 2.¹¹ Additionally, in a March 11, 2015, article in the
2 North Bay Bohemian about the proposed ranch management planning process, Ms. Gunn stated: “We
3 made it clear from day one....It’s not a question of if there’s going to be ranching, but how we do it.”
4 See Ex. I at 4.¹² Given these statements and what I learned through the workshops, I remain very
5 concerned that the RMP will result in continued management that favors ranching over wildlife and
6 natural resources.

7 18. The very important question of whether ranching should continue at the Seashore was
8 actually being addressed several years earlier in a new General Management Plan for the Seashore.
9 NPS knew then that the 1980 GMP was outdated. In the GMP process, concepts were discussed that
10 included reduction and even elimination of ranching in the pastoral zone. But that plan was shelved
11 and the then-Superintendent was sent to another park without any public explanation. This decision
12 frustrates me because the ranching areas are public land that the federal government purchased for
13 millions of dollars from ranchers decades ago, so the Park Service does not have any legal obligation to
14 ensure that ranching continues. Ex. J at 3.¹³ Thus, the agency must consider, through a public GMP
15 process like the one that began at the turn of the century, whether ranching can and should continue.

16 19. NPS is required to prepare a new GMP that looks at how the Seashore should be
17 managed, including the pastoral zone. A new GMP would, for the first time, provide a public process
18 for deciding whether ranching or some other use is the most appropriate use for all or part of the
19 ranching area. The proposed RMP is an inadequate vehicle because it unlawfully assumes the area will
20 be managed for ranching when the question of whether there should be ranching has never been
21 addressed in a GMP and it has never been the subject of a NEPA process. The ranching-specific RMP
22 will only be supported by an Environmental Assessment (“EA”), which will provide no analysis of the
23 impacts of potential, alternative uses of the existing ranch lands, as compared to continued ranching.

24
25 ¹¹ Kimney, S Seashore will write new dairy and ranch plan (Point Reyes Light, Dec. 6, 2013)
<http://www.ptreyeslight.com/article/seashore-will-write-new-dairy-and-ranch-plan>

26 ¹² Knight, J., Wild Meets Mild; Do Elk have a place in Point Reyes? (Bohemeian.com, March 11,
2015) <http://www.bohemian.com/northbay/wild-meets-ild/Content?oid=2702207&showFullText=true>

27 ¹³ This document describes when and for how much the federal government purchased the private
28 ranches at Point Reyes National Seashore and was obtained through a Freedom of Information Act
request to the Park Service.

1 20. If the agency issues the RMP without or before the GMP, I will be irreparably harmed
2 because ranching, with all of its negative impacts on natural resources, including wildlife, will continue
3 for another 20 years without any consideration of whether it should continue. If NPS adopts the
4 ranchers' demands, such as diversification of ranching in its various forms and removal of the elk, the
5 negative environmental impacts will increase exponentially.

6 21. Fencing conflicts with wildlife will not be solved through the RMP. During a February
7 2015 meeting I attended with the Park Service, NPS stated that it had already decided (before having
8 completed the RMP NEPA process) that it would not require ranchers to build and maintain wildlife-
9 friendly fencing along the roads and that any wildlife-friendly fencing standards for pasture (internal)
10 fences would only be considered as those fences needed replacing. This preference for ranching above
11 the well-being of wildlife is shocking to me, but it is understandable given that NPS has already
12 committed to continue ranching through the RMP, regardless of impacts to wildlife and other natural
13 resources. The Park Service will only give wildlife-friendly fencing any consideration as part of a
14 General Management Plan process, through which the agency has to consider whether ranching is an
15 appropriate land use for some or all of the pastoral zone in light of its statutory obligations to protect
16 wildlife and other natural resources and in light of other alternatives for use of the land and its
17 resources.

18 22. In summary, I am very concerned by the way the natural resources of the ranching
19 portion of the Seashore are treated and those concerns interfere with my use and enjoyment of the
20 Seashore. The only way natural resource, wildlife, and recreation conditions are going to improve is if
21 NPS is required to prepare, with full public participation, a new GMP in accordance with all applicable
22 laws, because the RMP and long-term lease process will not consider the overarching question of
23 whether ranching should continue at all. A GMP process would give me the opportunity to advocate
24 for broader management changes, such as the reduction or phasing out of ranching that NPS proposed
25 in 2003 as part of its alternative management visions for the new GMP, which are likely to alleviate or
26 eliminate the harm I suffer from ranching. If that were to happen, some of my concerns would be
27 alleviated and I would fully participate in the process. In the absence of the requested preliminary
28 relief from this Court, the Park Service will complete its RMP/long term lease plan and deny me the

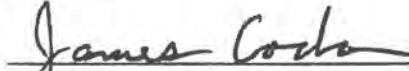
1 opportunity to view and photograph wildlife without the negative impacts of ranching and fences,
2 possibly for the remainder of my lifetime.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2016, at Petaluma, California.



JAMES CODA

James Coda

From: James Coda [REDACTED]
Sent: Tuesday, April 18, 2017 4:51 PM
To: 'Cicely_Muldoon@nps.gov'
Cc: 'Gordon_White@nps.gov'; 'kevin_McKay@nps.gov'; 'David_Brouillette@nps.gov'
Subject: 42 Sheep on M Ranch
Attachments: _G9A6622-Domestic-Sheep-M-Ranch-Point-Reyes.jpg

Dear Superintendent Muldoon:

I noticed that there is a flock of 42 sheep on the M (Grossi) Ranch. They are visible from Pierce Point Road. Attached is a photo of the sheep (and a black guard dog) that I took on Saturday, April 15.

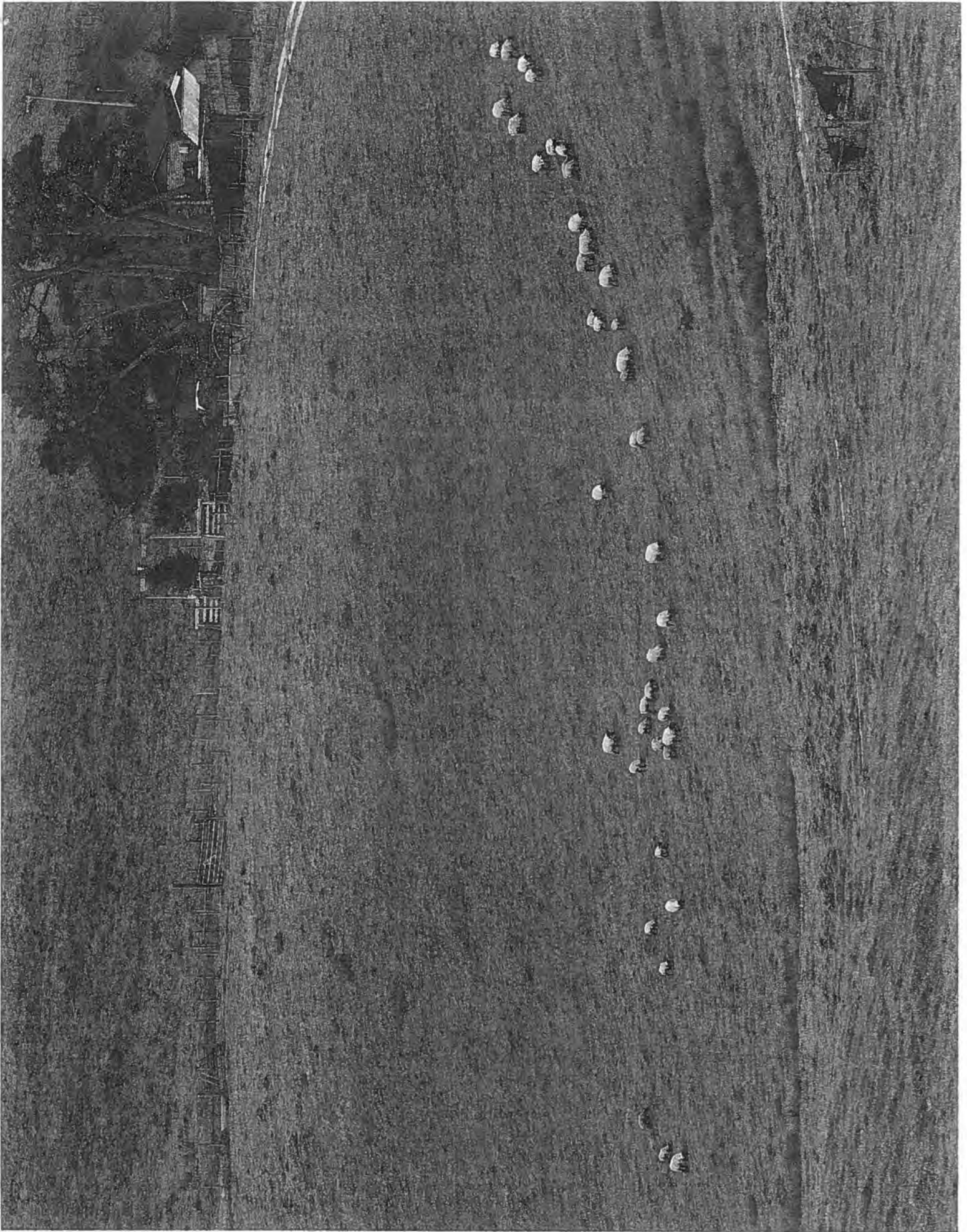
The M Ranch lease contains the common sentence at the end of the paragraph specifying cattle numbers allowed which says "[t]he raising of up to 5 animal units of livestock other than cattle for personal, non-commercial use is also authorized."

Having 42 sheep seems to be a gross violation of the above-quoted lease term. Will the Seashore require the immediate removal of the excess sheep and provide some penalty commensurate with the violation of the lease term and the overgrazing?

This situation underscores the concern of many people that some ranchers are grazing more cattle than their leases/permits allow.

Sincerely,

Jim Coda





Jim Coda Nature Photography

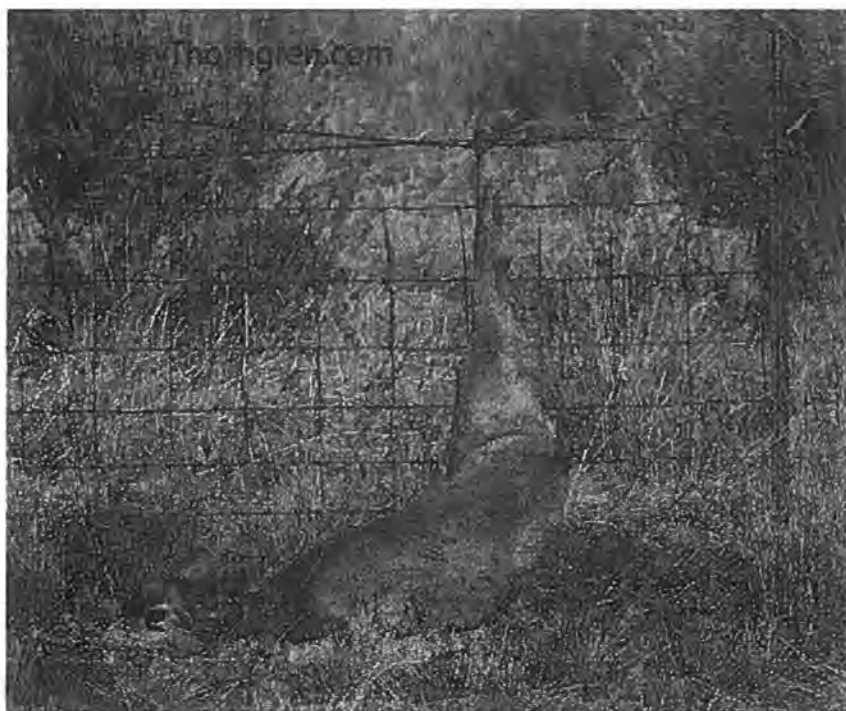
This is a blog about wildlife and landscape photography.

Point Reyes National Seashore; Fencing Harmful to Wildlife

Posted on [July 26, 2014](#)

I hope the bobcat that I wrote about in my last blog is OK. It may not have looked like it was very injured, but we couldn't see its underside and a single barb or point of barbed wire that cuts through the animal's skin as the animal goes through the fence can cause a serious laceration and possibly expose and tear muscle and other tissue below the skin. A laceration can lead to infection and death. It can also attract flies which will lay eggs in the wound. Once that happens it's just a matter of time. The animal seeks cover at some point and is never seen again.

I've been concerned for some time about the harm barbed wire fencing can do to wildlife. What got me started was seeing the photo below of a deer caught in a barbed wire fence in late 2011.



This mule deer is alive, but its legs are lacerated to the bone.

The photo was taken by my friend, Larry Thorngren. If you click [here](#) you can read about the incident. The deer was alive, but the legs were lacerated to the bone. The deer was beyond saving and therefore shot. A sad event and an unnecessary death. As you will come to understand below, this deer got caught in the fence because its hind feet did not clear the top wire and there was not enough clearance between the top wire and the wire below it. The result is sometimes referred to as "scissoring."

The photo prompted me to search the internet to see what I could find about barbed wire fencing and wildlife. The first thing I found was a paper published in 2009 by the Colorado Division of Wildlife entitled "Fencing with

Wildlife in Mind.” A little later I found a 2008 document published by the Montana Department of Fish and Wildlife entitled “A Landowner’s Guide to Wildlife Friendly Fences.” It was the basis for much of the Colorado paper. That Montana document has been followed by a later edition: “A Landowner’s Guide to Wildlife Friendly Fences,” Second Edition, 2012, Montana Fish Wildlife and Parks (hereafter “Montana Fencing Guide” or “Guide”). The document (both editions) was written by Christine Paige, Ravenswood Ecology, Jackson, Wyoming. To download and/or read the document click [here](#) and then click on the second-listed link. The Guide has been used by several other state wildlife agencies in developing their own guides to fencing.

The Guide starts off acknowledging that fences are needed to control livestock, but that they can also be hazards to wildlife, including birds. It describes fences that are harmful and how to build fences that are not harmful. There are several pictures showing animals killed by fencing, primarily barbed wire fencing. Note also that the title says it is a landowner’s guide. It was prepared for ranchers who want to use fencing methods on their lands that are considerate of wildlife. Most ranchers in Montana and the other western states have a relatively small private land holding, obtained originally under the Homestead Act or some other federal land disposal law, and a larger area of Bureau of Land Management (“BLM”) land that they use for livestock grazing under federal grazing permits. The Guide’s purpose is to show ranchers how to construct or modify fences on their land that restrain livestock, but not wildlife. Wild animals, unlike domesticated cattle, need to travel daily in search of food, water and cover; and, at appropriate times, to mate and give birth. Fences impede that necessary travel.

One of the things the Guide reports on is a two-year study of wildlife deaths caused by 600 miles of fencing in an area of northeast Utah and northwest Colorado. The study found that, on average, one ungulate (deer, elk or pronghorn) per year was found tangled (and dead) for every 2.5 miles of fence (at 600 miles that’s 240 animals per year). Most ungulates (69% juveniles and 77% adults) died by getting caught in the two top wires while trying to jump the fence. See photo of the deer above. 70% of all deaths were on fences higher than 40 inches.

We don’t know how many animals die each year at Point Reyes due to barbed wire because no one is inspecting all the miles of fencing every day. Some animals do die and still others are injured.

An example of what barbed wire can do to animals at Point Reyes is the skull of this large bull elk below. It died a horrible death. This should not happen anywhere, but especially not in a national park. This animal’s skeleton was found on Mt. Vision above Home Ranch. Note how the left antler split into two antlers.



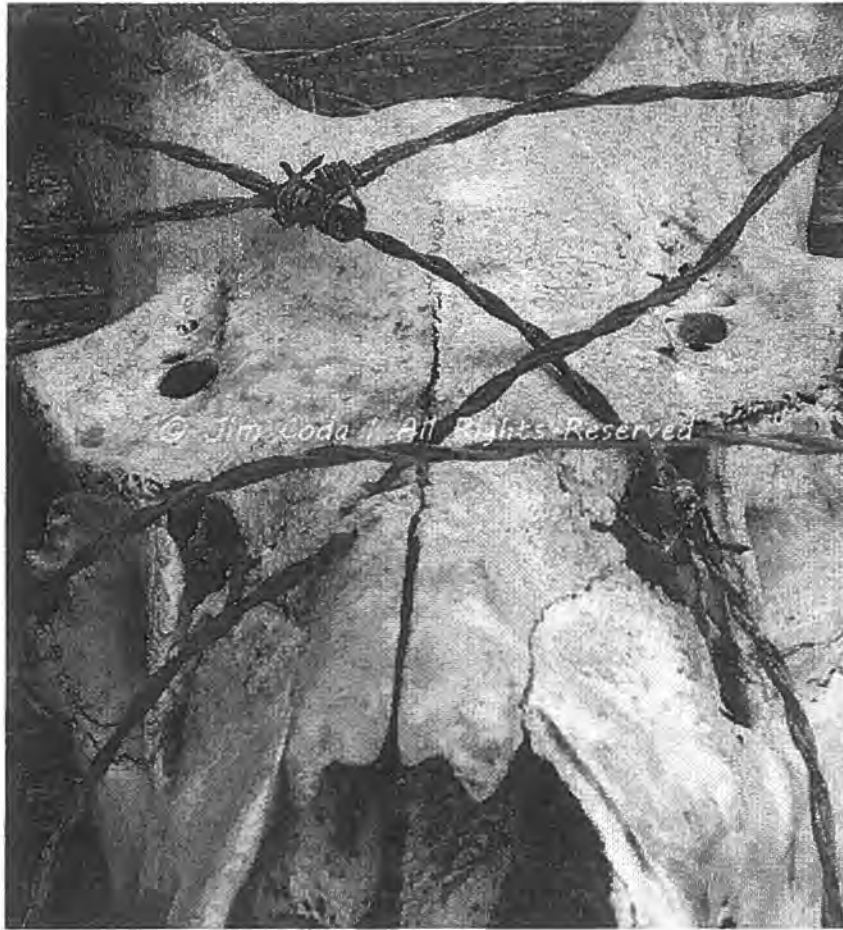
I don't know how the barbed wire became so tangled on this poor creature, but I've seen several pictures on the internet of elk with barbed wire in their antlers. In this case the wire wrapped around the bull's lower jaw and cut half way through the jawbone over time as it tried to eat and drink. See next photo.



The barbed wire cut its way through the elk's jawbone.

The wire was either (1) attached to a fence in the normal manner, (2) detached in part, or (3) completely separated from a fence and laying on the ground, possibly in coils. During the rut, bulls (and buck deer) will spar with bushes or anything on the ground and that may be what happened here. The wire could have been on the ground and/or tangled in some brush. Anyway, before long the wire wrapped around his antlers.

If you look closely you can see the barbed wire crossed the bridge of its nose which prevented the lower jaw from opening much. Note how the elk's attempts to open its lower jaw to eat and drink caused the barbed wire to cut into the bridge of its nose. We don't know how long this poor elk suffered.



Wire Cut Into Bridge of Nose

Note the sharpened barbs in the photo and the photo below. What is barbed wire? It's twisted steel wire (two strands of wire that are twisted (see photos)) with sharp points at intervals of three, four or five inches. Barbs come in two versions, two-point or four-point. It's been used in wars (e.g., the beaches at Normandy), around prisons (and concentration camps in WWII) and any other time someone wants to restrict movement of people or animals. It's the cheapest way to restrain cattle. It's sold in reels of 1/4 mile in length and it only costs about \$60-\$70 per reel. It's also very light at 40 to 80 pounds per reel depending on the gauge of the wire. It lasts from about three to ten years. It's galvanized, but still rusts and eventually fails. The sharpened barbs are quite capable of puncturing and tearing flesh. The barbs are over 1/2 inch long.

Here's a photo showing more closely what the barbs look like.



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Barbed Wire Barbs

Given the harmful nature of barbed wire, it should be used at Point Reyes only under the most stringent and safe conditions, if at all. The wildlife there deserve no less.

Getting back to the Montana Fencing Guide, it describes a wildlife-friendly fence as follows: It should allow animals to jump over or crawl under it without injury. Page 10. It should be highly visible (white pvc pipe around the top wire or flagging at regular intervals) so animals don't run or fly into it. *Id.* The top wire should be low enough for adult animals to jump over, preferably 40 inches, but no more than 42 inches; the distance between the top two wires should be 12 inches, preferably 14 inches, so elk and deer won't tangle their back legs with the top wires (like the deer in the first photo above). *Id.* The bottom wire should be at least 16 inches, preferably 18 inches, from the ground. *Id.* The top and bottom strands should be "smooth wire" (like regular two strand twisted barbed wire, but without the added barbs) so animals don't get snagged and injured. *Id.* Posts should be at 16.5 foot intervals. *Id.* In areas where fences must be built on slopes, the degree of slope must be taken into account. A 42 inch fence on a 30 degree slope is equal to a 62 inch fence if the animal is standing on the lower side of the fence. *Id.* at 9. Fences should be three wire, preferably, or four at most. *Id.*, at 32.

I've been wondering for a while whether BLM had any standards for fencing regarding wildlife. I thought that if any federal agency would have such standards it would be BLM because it manages millions of acres of public lands used for grazing by ranchers in the western states. As I was writing this post I finally did a search and found that BLM does in fact cover fencing in its manual. The fencing portion of the manual can be found [here](#).

It's 57 pages in length and a considerable amount of it is focused on wildlife. It generally follows what the Montana Fencing Guide says with slight variations. It's important to understand that it wasn't written as a suggested guideline for ranchers for their private property, but to be the standard for fencing on the federal land

managed by BLM. It should also be kept in mind that BLM is a “multiple use” agency (i.e., with many responsibilities, including grazing, mining, timber, recreation, wildlife, etc. which are often in conflict and of equal weight, generally), in contrast to the Park Service whose job it is, above all, to “conserve the scenery and the natural and historic objects, and the wild life [sic] therein.” 16 U.S.C. § 1.

Before addressing the specifics of fencing in the BLM Manual, here is some prefatory language to more fully understand the standards:

2. Deer, Elk, or Moose Habitat.

a. Limitations.

(1) Woven wire, 5- or 6-strand barbed wire fences and fences exceeding 42 inches in height all pose serious problems for deer ... When the lower strands of wire are both close to the ground and to each other, they impede movement of fawns and yearlings which tend to go under or through a fence.

(2) Normally, deer jump with their hind legs forward. If the top two wires are too close together or loose, deer often tangle their hind legs, resulting in broken legs, entangled animals dying of starvation or shock, and broken fences. Elk jump the same way, but usually move on after breaking the fence or injuring themselves. Within elk herd movement areas, fence damage can be extensive.

b. Standards. Illustrations 1 and 2 depict fencing standards to be used in deer, elk, or moose habitat.

BLM Manual, IV-5 and IV-6. (Emphasis added.)

Illustration 1 is a table which shows combinations of livestock and wildlife species using the same land. It shows that when you have deer and elk in an area where cattle and sheep graze you should use three-wire fencing. It should be 38 inches high and there should be 16 inches clearance on the bottom and 12 inches clearance between the top wire and the middle wire. It also states that the bottom wire must be smooth. Illustration II uses drawings instead of words to show how each fencing situation looks in terms of height and spacing of wires for the various combinations of wildlife and livestock.

So, how do the fences at Point Reyes stack up to the BLM Manual and the Montana Fencing Guide? I developed a sense over the past 2.5 years that the fencing was not good. I did some measuring at various times and knew heights and clearances between wires were bad, but I didn't keep records of those measurements. Based on three recent trips to measure a number of fences I can say that all the pastoral fences I measured failed the BLM standards and the Montana Fencing Guide on almost all counts.

The discussion below is based on 20 fence measurements on what I believe was 12 ranches (not always clear where one ranch ends and the next one begins). For simplicity's sake, I decided to use one of the two sets of standards/guidelines. I decided to use the BLM standards because BLM is a federal agency (a sister agency, no less) and because, like the Park Service, it owns the lands being fenced. As you'll recall, the BLM standards are no more than three strands; 38 inches in height; 16 inches clearance at bottom; 12 inches clearance between the top wire and the next wire and the bottom wire must be smooth. (The fences wouldn't have fared any better under the Montana Fencing Guide as you'll see if you keep those guidelines in mind when reading below.)

Of the 20 fences, none met the 38 inch height limit; only four met the 16 inch clearance requirement at the bottom; and none had smooth wire at the bottom. Eight of the 20 were five-strand fences that are not allowed under BLM's manual (or the Montana Guide), one was a six-strand fence and the rest were four strand fences. Thus, none met BLM's three strand requirement. Finally, all failed the 12 inch clearance requirement between the top two wires. The deer in the photo at the top got tangled in the fence because the top two wires were too close together. The Utah-Colorado study found almost 75% of the animals died because the top two wires were too close together.

The six-strand fence I found was especially egregious. It's 48 inches high with only 9 inches between the two top wires and, instead of 16 inches of clearance at the bottom, there was one wire at 6 inches and another at 11.5 inches. How does a deer fawn get through that? There is a little more space between the second and third wires. The third wire is 21 inches from the ground. That leaves a space of 9.5 inches between the second-lowest wire and the third-lowest wire. How big is that? I got out the metal ruler I used in the park and laid my little finger on the zero and stretched my thumb and got to 9.5 inches. Same as the space in the fence. Looking at my outstretched palm, a deer fawn couldn't get through that with those long gangly legs. Furthermore, it is much easier for a fawn to crawl under one wire than to pick its way between wires. If a fawn can't get past a fence it just lays down and waits for its mother to come back (and sometimes they don't as reported in the Montana Fencing Guide). A coyote couldn't get through there either. It would even be iffy for a bobcat. Maybe this is where the bobcat that I wrote about in my last blog ran into trouble. As for the 48 inch height, as BLM says, five-strand or six-strand fences and fences over 42 inches "pose serious problems for deer."



Point Reyes National Seashore; Fencing Harmful to Wildlife

Because there has been so much coverage in the news about elk breaking fences on the C Ranch's side of Drakes Beach Road I took several measurements there. I found three spots along the road that had broken wires. The first broken fence section was just after turning onto Drakes Beach Road. The top two strands were broken. The ground was covered in what I think was poison oak so I didn't measure there.

The next break was of a top strand. It was 44.5 inches high (on the portion still attached to the post) and the clearance between the top wire and the next wire was only 9.75. The last broken wire was a second wire just a short distance toward the beach from the previous break. It measured 42.25 inches at the top and the clearance

between the top two wires measured 10.75 inches, but it would have been slightly less if the second wire hadn't sagged some because of the break that began on the other side of the post.

Fortunately, the wires on these two areas of the fence line broke. If they hadn't, the animal's feet would have been caught in a "scissors" hold by the wires and the animal would have been helpless as was the case of the deer at the beginning of this blog.

I want to point out first that we don't know how those strands broke. In the case of the fence panels in the poison oak and the second break of the two breaks I did measure, the wires that broke were rusted (and are now laying on the ground, which is not good). They could have failed on their own and, in any case, probably weren't as strong as when they weren't rusted. Finally, a cow could have broken one or more of them.

But let's assume for the sake of discussion that elk broke the wires. As for the two I measured, no wonder the top two strands broke. We know from the BLM Manual and the Montana Guide that the fence is too high along the road and there isn't enough clearance between the top two wires. This is a recipe for broken fences and injured or dead elk (and deer).

If an elk or deer doesn't clear the top wire, and if the wire below the top wire is high enough to catch the animals lower rear legs/hooves as they rotate back under the top wire, then the animal becomes trapped or "scissored" by the two wires. In that case the animal hangs from the fence with the weight of its upper body making it a prisoner of the wires until it dies or is rescued by a human. See first photo above. Even if a human comes along (with the necessary heavy wire cutter or bolt cutter), there is no guarantee the animal will live. The deer in the first photo had to be shot. The best case is that the elk or deer breaks one or both top strands and therefore doesn't get "scissored." However, even in that case, the animal can suffer lacerations or other injuries, such as broken legs, that can lead to death. If elk (or deer) broke these fences, they may have been injured and their injuries may have resulted in their deaths.

This is absurd. More important, it's inhumane. Given the fact that elk inhabit this area and they are breaking these too-tall fences, with top wires too close together, this should be treated as an emergency and the fences on the west side of Drakes Beach Road (and perhaps the east side) should be modified per the provisions of BLM's Manual and/or the Montana Fencing Guide. This should be done before any more fence wires are broken and elk (or deer) are injured or killed.

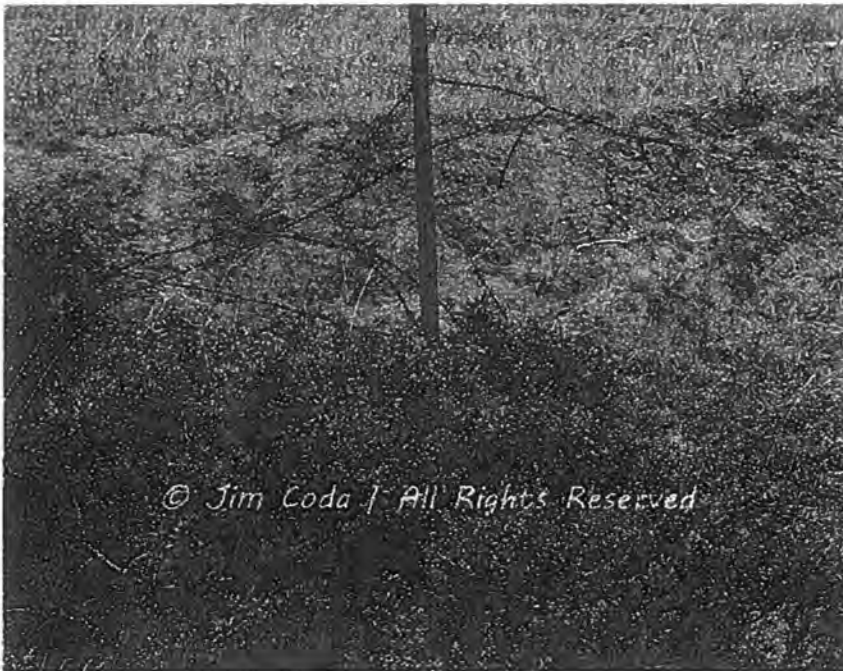
I should mention that the Park Service has installed wildlife crossing fence panels at one spot on each side of the road. The top wire(s) were removed and replaced with 4x4 posts installed parallel to the ground. The tops of these 4x4s are 34 inches from the ground. The elk seem to prefer crossing at these spots and I don't think any cattle have crossed them. A couple more of them along each side of the road would seem likely to prevent more broken fences and injuries or deaths to elk (or deer) there.



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Elk Crossing Fence

I need to say some more about broken fences at Point Reyes. There are broken fences everywhere in the pastoral zone. The three fences along Drakes Beach Road are not unusual at all. Here's one of the photos I took of broken fences. This one is on the Tomales Peninsula. Note the condition of the old, rusty wire. If a deer crosses here it could get its legs tangled in the wire.



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Broken Fence

Here is another broken fence on the Tomales Peninsula. Let's take a closer look. There are two wires coming off the top of the post. They appear to be relatively new in that they show no rust. The top wire is intact, so why is either of them attached to the top of the post? Below them there is a third wire that is broken (for unknown reasons) and hanging down from the post. I assume it ran from this post to the post to the left of it. It doesn't appear rusty either. All three wires seem to be quite long and all are laying on the ground. Some have loops in

them. They are all hazards for wildlife, especially any buck deer that would be looking for things to joust with during the rut.



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Loose Wires Hanging Off Fence Post

Leaving fencing like this along fence lines is just asking for some animal to get caught in it. The Park Service needs to patrol for this kind of thing and require the rancher to fix it immediately.

In summary, the Park Service needs to establish a fencing policy for all fencing at Point Reyes. It should adopt the most stringent standards in the BLM Manual and/or the Montana Fencing Guide. After all, unlike ranchers in Montana, and BLM with its multiple use mission, the Park Service has a legal mandate for every park to “conserve the scenery and the natural and historic objects and the wild life [sic] therein” 16 U.S.C. Section 1. (Emphasis added.) The Point Reyes statute goes on to say the Secretary shall administer the property “without impairment of its natural values.” 16 U.S.C. § 459c-6. Wildlife is clearly one of its natural values.

On the other hand, ranching is only allowable to the extent it doesn’t interfere with the Park Service’s statutory mission to conserve wildlife and doesn’t impair the park’s natural values (including wildlife). It is discretionary under the statute and, if allowed, “shall be subject to such restrictive covenants as may be necessary to carry out the purposes of” the Point Reyes statute. 16 U.S.C. § 459-6. Again, “purposes” includes wildlife. Ranching is not a purpose of the park. If it were, the statute wouldn’t be worded the way it is.

If the fencing standards above are followed at Point Reyes, wildlife is much less likely to get injured or killed and much less likely to damage fencing.

Addendum: I thought this post was going to end with the previous sentence. However, as I was reviewing the draft, I decided to call the park to see if there was any fencing policy or guideline used by the park. I hadn’t found any national fencing policy for the Park Service so I wasn’t expecting anything. However, I learned the park has

developed a set of specifications that it uses whenever the park hires a contractor to build a fence for its own reasons, like excluding cattle from creeks or other sensitive areas. I was told it is also the spec that is referenced in some or all leases/permits for any fencing done by ranchers. It is as follows: Five strand; 48 inch high; bottom clearance 12 inches; clearance between all other wires, including the top two wires, 9 inches. The top and bottom wires are to be smooth.

Every part of these specs is contrary to both the BLM Manual and the Montana Fencing Guide, with the exception of smooth wires. The park should modify its fencing specs and its fences immediately to meet the specs of the BLM Manual and/or the Montana Fence Guide. Furthermore, why isn't excluding cattle from creeks and other sensitive areas a rancher obligation and cost? Why should the Park Service use park funds to subsidize the ranchers? Finally, because this fencing also excludes deer and elk from creeks, where are they supposed to get their water?

The pastoral zone is essential habitat for all sorts of wildlife, yet it seems no one is taking wildlife into account there.

Second Addendum: I erred in including the special fence the park installed along Drakes Beach Road as one of the 21 fences measured. It isn't a regular barbed wire fence with its 4x4 wood post at the top and angled wires beneath. I've gone back and changed the number "21" to "20" where "21" appeared. No other changes are necessary because I didn't use that fence for any of the measurements discussed.

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About Jim Coda

I am a nature photographer living in the San Francisco Bay Area. I specialize in photos of birds, mammals, and landscapes.

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Please note: The preferred method for commenting is to use the electronic form located at: <http://parkplanning.nps.gov>. Click on the link 'Plans/Documents Open for Comment', then select the document on which you wish to comment.

If you cannot use the electronic form, you may send this hard copy form and/or your letter to:
Point Reyes GMP Amendment
Superintendent
1 Bear Valley Road
Point Reyes Station, CA 94956

Before including your address, telephone number, electronic mail address, or other personally identifying information in your comments, you should be aware that your entire comment (including your personally identifying information) may be made publicly available at any time. While you can ask us to withhold your personally identifying information from public review we cannot guarantee that we will be able to do so.

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Park: Point Reyes National Seashore

Project: Point Reyes National Seashore and North District Golden Gate National Recreation Area General Management Plan Amendment and Environmental Impact Statement (ID: 74313)

Document: 2017-10 General Management Plan Amendment Newsletter (ID: 83408)

* indicates required fields

City: * Point Reyes Station State/Province: * CA

Postal Code:* 94956

First Name: Morgan Middle Initial: _____

Last Name: Patton

Organization: Environmental Action Committee of West Marin (EAC)

Member Official Representative

Address 1: PO Box 609 | 65 Third Street #14

Address 2: _____

Country: United States

E-mail: morgan@eacmarin.org

Comments or Requests:

See attached letter



November 22, 2017

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Point Reyes National Seashore
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Point Reyes, CA 94956

Re: Comments on General Management Plan Amendment Newsletter

Dear Acting Superintendent MacLeod,

The Environmental Action Committee of West Marin (EAC) greatly appreciates the opportunity to provide comments on the Point Reyes National Seashore (Seashore) General Management Plan Amendment (GMPA). Since 1971, EAC has worked to protect and sustain the unique land, waters, and biodiversity of West Marin.

EAC is appreciative of the planning process for the GMPA and the opportunity to provide public comments on six proposed conceptual alternatives (Concepts) recommended by the Seashore. The GMPA addresses all lands currently under agricultural lease/permits in the Seashore and the north district of Golden Gate National Recreation Area. The Seashore is a unique landscape and EAC remains committed to our guiding principles to ensure the protection and preservation of natural resources, restoration of degraded habitats and park resources, and maximum public access to parklands.

Based on EAC's review of the 2006 National Park Service (NPS) Management Policies, when there is a conflict between the protection of resources and the use of those resources, conservation will be predominant, and concerns will be resolved with scientific study and public involvement, in order to pass on all park resources, not merely unimpaired, but in better condition, for the enjoyment of future generations.

The GMPA must protect, restore, and preserve park resources using ranch leases that ensure multi-generational, environmentally sustainable ranching is complementary to the natural resources and visitor experiences within the park.

EAC understands the six Concepts presented in the GMPA Newsletter are a commencement of a process intended to engage public feedback and ideas, a process that, at this time, is deficient in definitions, baselines, and scope. Therefore, the public is not limited or constrained by the Concepts and should use this comment period to seek clarification, question the conceptual choices, and present information that is missing.

Based on this understanding, EAC offers the below comments and questions regarding the GMPA Newsletter. These comments are organized under the following eight areas of concern: 1) establishing a baseline, 2) management strategies and regulations, 3) diversification of operations, 4) protection of natural resources, 5) climate change, 6) habitat protections, 7) habitat restoration, and 8) public access.

1. Establishing a Baseline

The GMPA Newsletter does not provide any information on the baseline for new leases. What is the baseline against which new leases will be measured? The baseline for environmental impacts should be the conditions and practices authorized by the existing leases. However, if a leaseholder has violated their permits, the unauthorized practices should not represent a baseline.

EAC supports an additional baseline measurement to evaluate ranching operations based on the 1962 enabling legislation that allows for ranching and dairying purposes within the pastoral zone.¹

2. Management Strategies and Regulations

The GMPA should provide for clearly defined regulations concerning ranching operational practices in order to ensure the protection, restoration, and preservation of park resources (natural and cultural). The GMPA Newsletter does not include information on how ranching will be conducted, a critical subject that must be clearly defined and made available for public comment before any new leases are issued. EAC has included several topics under this heading of management strategies and regulations for the Seashore's review and response.

2. a. Issuing Long-Term Permits

Concepts 2-5² propose issuing new long-term permits (20-year) to ranching operations. Any long-term leases should ensure lease holders are engaged in dairy and cattle ranching practices that are compatible with the Seashore's mission to protect park resources (natural and cultural), and that the operations are based on conditions and practices that are complementary to the natural resources and visitor experiences within the park. Additionally, if new permits are issued, EAC requests that they be made public and posted for maximum public transparency, while allowing any information that is considered proprietary to be redacted.

¹ Pub. L. 87-657, Sec. 4, Sept. 13, 1962, 76 Stat. 540

² Concepts 2-5 include: No Dairy Ranching and Management of Drakes Beach Tule Elk Herd, Reduced Ranching and Management of the Drakes Beach Tule Elk Herd, Continued Ranching and Management of the Drakes Beach Tule Elk Herd (NPS Initial Proposal), Continued Ranching and Removal of the Drakes Beach Tule Elk Herd.

2. b. Constructing Long-Term Management Goals

Will the Seashore identify and include short and long-term management goals and metrics into the new leases? If so, what science-based criteria will be applied to determine the success of each of these goals? How will the Seashore update the goals and metrics in response to changed conditions?

2. c. Developing Permit Transparency, Compliance, and Incentives

Management guidelines for ranching permits should be transparent, consistent, and uniformly applied. EAC supports public disclosure of management metrics, monitoring of lease compliance, and habitat restoration efforts. We also support clear and timely consequences for non-compliance with permit terms. The leases should contain trigger mechanisms for non-lease compliance and include public transparency when leases are violated.

2. d. Defining Succession Planning

Succession planning is an important part of the GMPA process, yet references to succession planning for the proposed long-term leases are missing from the Concepts. A transparent succession planning process is necessary before long-term leases are issued so that the public and the lease holders can understand the obligations and conditions ranchers must satisfy in order for a lease to pass to another family member. What is the Seashore's current policy for succession planning when a family no longer wishes to operate under their lease? Will the Seashore have a new proposal for the GMPA regarding succession? If so, what will that include? EAC understands that leases/permits for multi-generational dairy and cattle ranching operations may be issued to the existing lease holders.

2. e. Establishing Best Management Practices

Best Management Practices (BMPs) promote protection of park resources and provide the Seashore and lease holders with measureable outcomes and expectations for operating practices. The proposed Concepts reference "establish programmatic approaches for streamlined implementation of best management practices." Please define how programmatic approaches will be developed and what streamlined implementation means. What are the primary objectives of the BMPs?

EAC supports BMPs that promote the protection and improvement of park resources, with clear and measurable goals and outcomes being written into all the operational permits. Sensitive resources like wetlands, riparian corridors, and estuaries are of particular concern. Water quality and the overall health of these important habitat areas must be adequately safeguarded.

2. f. Identify Authorized Measures for Operational Flexibility

Concepts 2-5 propose lease/permits that would identify authorized measures for "operational flexibility and diversification." It is important to differentiate and define these two terms. EAC requests that the Seashore separate these terms in subsequent planning documents and define what operational flexibility means. In addition, we request that the Seashore provide an explanation of the process by which the Seashore will use to determine how operational changes impacting land-use intensity will *not* impair resources, and how those operational changes will be measured and evaluated.

3. Diversification of Operations

Diversification is an inherently ambiguous term that needs to be defined so that the public understands that diversification could bring about a dramatic shift of commercial land use within the Seashore. Diversification is proposed in Concepts 2-5, implying that the Seashore is considering authorizing some level of diversification in the lease/permits. The November 2014 Ranch Comprehensive Management Plan Update public workshop newsletter described diversification as

“an important activity for some ranchers, but typically the first priority is to improve pasture management and then focus on potential diversification opportunities ... Diversification activities identified through the scoping process and ongoing discussions include the addition of new types of livestock, row crops, stabling horses, paid ranch tours and farm stays, small-scale processing of dairy products and sales of local agricultural products...”

EAC understands authorized ranching operations are limited to dairy and cattle ranching, as intended by the enabling legislation. Therefore, in order to preserve the Seashore’s natural and cultural resources, EAC does *not* support the conversion of land to commercial uses other than dairy or cattle ranching.

3. a. Production of Silage

The Seashore has recorded 490 bird species (54% of all North American birds) and is located along the Pacific Flyway, a major north-south flyway for migratory birds extending from Patagonia to Alaska³. The Seashore currently allows some lease/permit holders in the pastoral zone to produce silage to provide forage for cattle. Mowing the silage fields is known to exterminate nesting birds. How does the Seashore ensure that nesting birds are protected during the production of silage to ensure compliance with the Migratory Bird Treaty Act and other federal laws? How does the Seashore ensure that allowances, procedures, and timing for silage production are followed?

EAC does not support the expansion of silage production outside of those locations that have currently permitted allowances for this practice, and encourages the establishment of a long-term program to monitor silage production and mowing, and to levy penalties where limits are exceeded. Additionally, the Seashore should require silage producers to implement best management practices to reduce the impacts on nesting birds and require advance bird surveys before fields are mowed to ensure compliance with federal nesting bird protection legislation. Finally, there are successful no-till practices for silage that can be implemented within the Seashore to protect and conserve habitat and soil quality.

3. b. Proposals for Visitor Experience Diversification

The November 2014 Ranch Comprehensive Management Plan Update public workshop included references to events (large and small) as potential opportunities for lease holders to generate income through commercial activities other than dairy or cattle ranching. In order to ensure visitor experiences are managed and regulated by the Seashore, all events should go through Seashore headquarters for special use permits. Individual lease-holders should not

³ Point Reyes National Seashore website, *Birds*, <https://www.nps.gov/pore/learn/nature/birds.htm>

have the authority to permit special major events as they could cause detrimental impacts to park resources that the Seashore would not be able to manage.

3. c. Authorization of Diversification

What level of diversified agricultural production could be allowed under the enabling legislation of the Seashore? EAC's reading of that legislation is that it provided for ongoing dairies and cattle ranch operations. What criteria and/or authority will the Seashore utilize to sanction diversification activities? If the Seashore plans to base those criteria on the intensity of land use, what baseline and scientific criteria will be utilized? Under what legal authority could the Seashore justify allowing diversified commercial agriculture that honors the preservation of park resources (natural and cultural)?

4. Protection of Natural Resources

The GMPA must protect, restore, and preserve park resources using ranch leases that ensure multi-generational, environmentally sustainable ranching is complementary to the natural resources and visitor experiences within the park.

The 2006 NPS Management Policies direct NPS to manage natural resources "to preserve fundamental physical and biological processes, as well as individual species, features, and plant and animal communities" and recognize all components of a natural system by preserving these processes in their natural conditions and avoiding resource degradation.⁴ Based on the management policies, what criteria will the Seashore utilize to ensure the preservation of natural resources, processes, and prevent degradation of habitats?

4. a. Tule Elk

The Seashore is the only national park⁵ with a native population of tule elk. The elk have been prevalent in the Bay Area and Marin for thousands of years, long before their extirpation in the 19th century. Tule elk are part of the Seashore's natural resources, just like the seals and whales, and are an important part of the Seashore's ecosystems. Considerations to manage the elk populations should be in the context of park policies to manage other natural resources of the Seashore. Based on these criteria, EAC offers comments on the elk management strategies.

The Concepts all reference "management" of the different elk herds. Please define management, and the tactics it includes. EAC is supportive of utilizing a diverse combination of management strategies, however EAC does not support culling or removing the herds.

The Philip Burton Wilderness area should not be manipulated or changed as part of any management strategy to accommodate the elk. Absolutely no structures should be authorized in the wilderness area that would diminish or compromise management of this dedicated wilderness.

⁴ 2006 National Park Service Management Policies, page 36.

⁵ Citizen's Guide to the Tule Elk of California,
www.biologicaldiversity.org/campaigns/protecting_Point_Reyes_elk/pdfs/TuleElkBrochure.pdf

Long-term leases and overall agriculture management strategies may strive to reduce conflicts and find a way to balance and accommodate the presence of both cows and elk, but the elk must not be managed for the purpose of benefitting commercial lease holders.

5. Climate Change

Climate Change will impact the park resources in the near future in many ways: to mention a few, sea-level rise, average temperature changes, changes in average rainfall totals, and distribution of species, both native and invasive. These impacts will alter the Seashore. For example, areas that border beaches and estuaries will experience flooding and migration of boundaries. This includes wilderness areas like Drakes Estero and Abbotts Lagoon that may eventually migrate into the pastoral zone. How will the Seashore manage changes to these bordering coastal areas?

EAC requests that the natural resources and buffers are prioritized, and suggests reduced ranching areas be designed with sea-level rise in mind. This would provide a reasonable basis to plan for pasture use for dairy and cattle ranching, while ensuring the long-term protection of park resources that will be subject to change in the foreseeable future. The Seashore should use the best available science to determine potentially impacted areas and to plan for the protection of the threatened natural and cultural resources. How will the proposed long-term leases incorporate flexibility for the Seashore to adjust for climate change impacts?

5. a. Carbon Farming Planning

Carbon farming is a set of management techniques that help to reduce the greenhouse gas emissions from a ranch through multiple techniques to sequester carbon. Carbon farming planning practices are being demonstrated on private lands in Marin County and through conservation easements managed by Marin Agricultural Land Trust (MALT). According to MALT's Carbon Farming website, the techniques used to reduce the overall greenhouse gas emissions include rotational grazing, woodland and stream restoration, native vegetation planting, no-till agriculture, dry-manure management, planting of hedgerows and windbreaks, methane capture, and compost application on pasturelands⁶.

Carbon farming planning techniques that restore habitat, improve water quality, and promote no-till farming practices are excellent ways to sequester carbon and improve the natural resource conditions on the ranches. These techniques should be prioritized and emphasized by the Seashore as one way the ranches may become more sustainable in their environmental practices.

⁶ Pasture and Rangeland as defined by U.S. Department of Agriculture, Natural Resources Conservation Service, *Pasture*: Lands composed of introduced or domesticated native forage species that is used primarily for the production of livestock. They receive periodic renovation and/or cultural treatments, such as tillage, fertilization, mowing, weed control, and may be irrigated. They are not in rotation with crops. *Rangeland*: Land used primarily for the production of grazing animals. Includes native plant communities and those seeded to native or introduced species, or naturalized by introduced species, that are ecologically managed using range management principles.

https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1142489.pdf

November 17, 2017

Letter re: GMPA Newsletter

Carbon farming planning techniques should not impair park resources and techniques that may inappropriately impact park resources should be considered only after long-term scientific studies have been conducted. For example, compost spreading could obstruct public access and cause harm to native plants on the coastal prairie by stimulating growth of non-native plants. In addition, if methane capture digesters are considered, what is the size of the infrastructure and what is the intensity of land use?

6. Habitat Protections

The proposed Concepts indicate “NPS would identify broad management strategies to preserve park resources...” What management strategies would be applied and what criteria will be utilized to measure natural resources and cultural resources?

6. a. Water Quality

The GMPA should ensure that water quality is not impaired by ranching and dairying activities. Water quality characteristics affect the ability of species to persevere. In order to ensure healthy and balanced habitats, the water quality of streams, creeks, wetlands, and estuaries should be subject to independent research to determine the acid-base status, nutrient conditions, and chemical stressors. As part of the conditions of the 2006 NPS Management Policies, protection and restoration measures should be taken into account to improve the water quality of natural riparian habitats and preserve natural system components.

6. b. Resource Buffers

Resources buffers are essential to protect sensitive habitats and ensure ecosystem health. How does the Seashore determine which park resources are included in a buffer area? Will resource buffers be designed to adjust over time, due to changing environmental conditions? How will the Seashore manage buffer areas that change with the landscape over time and due to climate change?

6. c. Pasture Management

EAC understands that the Seashore has adjusted its measurements of Residual Dry Matter (RDM) as of 2016 based on the 2015 Residual Dry Matter Analysis Report⁷, and has implemented an adaptive management technique to better understand the overall health and grazing patterns of the pasture grazing lands. How will the Seashore ensure that this type of important and comprehensive program continues year after year with limited personnel resources? In order to protect the rangelands and coastal prairies, what RDM techniques will be applied to ensure accurate measurement of the rangelands and prevent overgrazing? What actions will the Seashore take in response to indications of overgrazing?

⁷ Point Reyes National Seashore website, *1987-2014 Residual Dry Matter Analysis Report and Updated Rangeland Monitoring Guidelines for Livestock Grazed Grasslands within Point Reyes National Seashore and Golden Gate National Recreation Area*, Range Ecology Lab Department of Environmental Science, Policy, and Management University of California, Berkeley, August 30, 2015.

November 17, 2017

Letter re: GMPA Newsletter

6. d. Fencing

EAC supports the installation and maintenance of wildlife-friendly fencing to exclude cattle from sensitive resources and prevent degradation of natural habitat. Additionally, how much electric fencing is currently in use in the Seashore? EAC would not support this becoming the dominant form of fencing. The GMPA must analyze the cumulative impacts of electric fencing on public access and movement of wildlife.

6. e. Pesticides and Chemicals

The GMPA should require a permit/lease condition requiring a process for disclosure of the chemical types, storage techniques, and uses for pesticides, antibiotics, insecticides, herbicides, etc. to prevent these toxins from being released into the environment through improper storage, in the event of a natural disaster, or other inadvertent applications.

6. f. Integrated Pest Management (IPMs)

IPMs should be documented and approved by the Seashore before implementation by permit holders. Pesticides that have the potential to impact other species should not be applied under any conditions, for instance, rodenticides that would harm other species.

What is the current usage level of herbicides to control weed management? Is the current level assumed to be the baseline? Will the GMPA include a weed and pasture management plan? How will the Seashore evaluate and control the negative impacts of mowing as a weed management technique, including erosion and wildlife dangers? What priority will the Seashore place on restoration of native grasses?

7. Habitat Restoration

The proposed Concepts are deficient in references to restoration of habitats that have been degraded or impaired by ranching activities. It is important that habitat restoration (and protection) is a top priority of the GMPA. **Specifically, water quality, erosion, native plant and species impacts must be prioritized over other strategies to ensure that ranching operations are meeting the highest possible environmental compatibility standards.** What criteria will the Seashore use to review habitats within lease/permit areas? What opportunities will be available to lease/permit holders to engage in restoration activities?

7. a. Mitigation

The Seashore must determine that activities authorized in the GMPA will not impair park resources. What ranching and dairying activities require mitigation? How will the requirements for mitigation be re-evaluated over time due to changed conditions? What are the consequences of non-compliance with lease terms? Will the Seashore require that outstanding management issues and mitigation be addressed prior to the issuance of a new lease?

7. b. Native Grass Restoration

Restoration of native grasses must be included in the GMPA process to ensure a healthy pastoral zone. One method to support the reintroduction of native grasses would be to require that any lease holders who bring hay, hay cubes, straw, grain, and/or other crop or mulch products into the Seashore be required to use certified "weed free" products based

November 17, 2017
Letter re: GMPA Newsletter

on the standards of the North American Weed Management Association, regardless of how they are used (feed, livestock bedding, erosion control, etc.)⁸.

7. c. Endangered Species

The 2006 NPS Management policies specifies that natural resources will be managed to preserve fundamental physical and biological processes. In the cases of special status and endangered species, NPS is legally compelled to protect habitat. How will the Seashore ensure that endangered species habitats are protected for established or newly discovered species? How will the Seashore anticipate and plan for protecting these habitats over time given changing conditions?

8. Public Access

The Concepts propose review of visitor carrying capacities and enhanced visitor experiences. EAC supports maximum public access to parklands, recognizing the respect needed within the ranch core. How will the Seashore improve visitor experiences working with ranchers to ensure clear signage, access points through gates, and maintaining trails? EAC would like to see improved visitor interpretation in areas of the pastoral zone and the removal of locks that prevent public access to these parklands. How will the Seashore evaluate and respond to visitor use in highly impacted areas that is damaging and impairing park resources, e.g. at Bass Lake in the Seashore? How will the Seashore establish visitor carrying capacities to manage public use while concurrently protecting park resources? What enhanced visitor experiences will be prioritized as part of the GMP amendment process?

Conclusion

Thank you for this opportunity to present comments. EAC looks forward to actively participating in the GMPA process. EAC would like to see the GMPA protect, restore, and preserve park resources using ranch leases that ensure multi-generational, environmentally sustainable ranching that is complementary to the natural resources and visitor experiences within the park. Specifically, impacts to water quality, erosion, native plant and species must have the highest priority to ensure that park management achieves the greatest possible level of natural resource protection.

Sincerely,



Morgan Patton
Executive Director

⁸ USDA Forest Service, Deschutes National Forest, *Livestock in the Forests – Weed Free Feed is Required*. <https://www.fs.usda.gov/detail/deschutes/learning/nature-science/?cid=stelprdb5300707>. Accessed November 18, 2017.

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POINT REYES NS

November 17, 2017

Superintendent Cynthia MacLeod
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Dear Superintendent,

I am in full support of the comments submitted for this EIS process by the Point Reyes Seashore Ranchers Association. My family purchased the Historic F Ranch on the Point Reyes Peninsula in 1919, and has managed it ever since. This ranch represents my main income. Although I don't live on the ranch, I am on the ranch every day to feed and check my cattle. My dream is that my children and grandchildren carry on this tradition long into the future. I strongly object to any alternative in the GMP Update that eliminates or reduces ranching at Point Reyes or the GGNRA. Any reduction in ranching would devastate my family or any of the other family ranches. Please honor the will of Congress when it created the Point Reyes National Seashore. We were promised that we could stay.

Sincerely, *Rich*



Rich Gallagher
Historic F Ranch



Nov 19, 2017

Main Co. Board of Supervisors
Twice Center,
San Rafael, CA

cc To GMP Amendment
C/O Superintendent
Pt Reyes National Seashore
1 Bear Valley Rd., 94956

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2017 NOV 22 AM 10:01
POINT REYES NS

To Whom it may concern:

I think the ranches should remain
in the Pt Reyes National Seashore with
30 year leases.

Some of the ranches were operating
since 1860, long before the park was
established in 1962. In fact, they sold
their land so the park could exist.

20 yr. leases would allow ranchers
to make long term decisions on improvements
and establish new environmental practices to
keep up with the times.

Rule etc need to be controlled so they
don't interfere with the ranches.
It's a joy to drive to the lighthouse & see
cattle grazing on the hillside. It's part of
West Marin's history & needs to remain with help
and support and 20 yr leases. Sincerely

(Main Co. Resolution # 1931)

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2017 NOV 22 AM 11:40

POINT REYES NS

November 22, 2017

Superintendent Cynthia MacLeod
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, California 94956

Dear Superintendent:

We appreciate the opportunity to comment on the Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGRNA) (collectively the "Seashore") General Management Plan (GMP) Amendment process and the subsequent National Environmental Policy Act (NEPA) review. We understand this to be the first of several scoping and issue identification steps as part of the GMP and NEPA processes.

The GMP Amendment is the foundation for providing the cultural resource, natural resource, and economic benefits envisioned by Congress when it established and preserved these magnificent areas and provided for continued ranching and dairying in the Pastoral Zone. We are honored and grateful to be part of this longstanding history and we take great pride in continuing to ensure that ranching and dairying contribute to the agricultural heritage of Marin County and promote the environmental and scenic quality of the working landscapes of the Seashore. Accordingly, we offer the following comments for consideration during this public comment period and we will participate fully in subsequent stages and opportunities to discuss the development of the GMP for the Point Reyes National Seashore and Golden Gate National Recreation Area.

I. Purpose and Need

A fundamental first step in the NEPA process is defining the purpose and need for the underlying federal action. The purpose and need forms the basis for identifying the reasonable range of alternatives to be evaluated and provides the criteria by which to systematically compare the identified alternatives. Through the GMP amendment process, the NPS is establishing a strategic framework which will guide the long-term management of the 28,000 acre Pastoral Zone. We believe that it is critical that this statement must recognize the critical need for fostering and maintaining sustainable dairy and beef ranching in the Seashore to protect the historic resources of the area, maintain the environmental conditions, and continue to contribute to the local economy. Ranching has a long and important history on the Point Reyes peninsula and adjacent National Park Service lands. These working ranches are a vibrant part of the culture of the Point Reyes National Seashore and represent an important contribution to the superlative natural and scenic resources of these NPS lands. Protection of these diverse and unique resources is an important responsibility shared by the NPS and Seashore ranchers within the Pastoral Zone. A comprehensive management plan is needed to:

- Articulate a clear vision for ranching on existing ranch lands in the Pastoral Zone administered by Point Reyes National Seashore.
- Allow for issuance of leases with terms of at least 20 years to provide for maintenance and improvement of ranching infrastructure, the working landscape, and the associated environment.
- Address concerns related to tule elk impacts on the environment and working ranches.
- Provide clear guidance and streamline processes for Seashore and regulatory review of proposed ranching activities, including best management practices that promote protection of Seashore resources.

II. Alternatives

The heart of the analysis required under NEPA is the identification and evaluation of alternatives. NEPA regulations require an agency to "rigorously explore and objectively evaluate all reasonable alternatives" (40

CFR §1502.14(a)), to devote substantial treatment to each alternative (40 C.F.R. §1502.14(b)), to identify the federal agency's preferred alternative (40 C.F.R. §1502.14(e)) and to describe the environmental impacts of the proposed action and potentially feasible alternatives in a comprehensive form to sharply define the issues and provide a clear basis for choice among options by decision-makers and the public. We recognize that pursuant to the terms of the July 2017 Settlement Agreement, NPS must include the three alternatives identified therein. As is recognized in the GMP Amendment newsletter, the NPS is not limited to these alternatives and it is imperative that NPS consider a full range of alternatives. The NPS GMP notice includes three additional alternatives which we agree should be part of its review.

In addition to the three alternatives proposed by the NPS, we urge consideration of the following modifications or expansions of the existing list of alternatives referenced by NPS:

- Evaluate an alternative similar to the second "Continued Ranching Alternative" proposed by NPS, which allows for defined additional opportunities in farming and diversified agricultural production to complement existing ranching and dairy activities. We believe that such limited additional uses would provide multiple economic and educational benefits to the community, would increase the economic viability of Seashore ranches, and would strengthen the overall agricultural economy of our region. We are not proposing in this alternative expanding beyond the current 28,000-acre Pastoral Zone. In addition, in this alternative, we would ask that NPS consider a somewhat longer lease term (25-30 years) for ranches and dairies to facilitate investments in our agricultural infrastructure that will make us more productive, efficient, and protective of the environment. The added term can help us amortize such measures in a sustainable, long term fashion.
- Consider forage improvement practices which could result in modest additions to existing herds and dairy farms consistent with water quality improvements and carbon sequestration practices. Allowance of forage improvement practices could be a consideration for addition to the NPS' best management practices that would allow ranching on the Seashore to evolve to be a national model for renewable and beneficial ranching for resource management.
- We suggest that the "Reduced Ranching" should be amended to reduce ranching only where there is an arguably justifiable reason. No such reason is apparent in the initial description of the alternative. For instance, the AT&T Lease is currently managed in concert with D. Rogers Ranch Lease (as referenced in the D. Rogers Ranch Lease) in such a way as to allow seasonal grazing of each, controlled rest periods and stocking rates, and improvement of habitat for listed endangered species (Red Legged Frogs, Sonoma Alopecurus, Beach Layia, and Myrtle's Silverspot Butterfly). Specifically, we ask that AT&T Lease remain in active ranching, and not removed from active ranching, as proposed in the "Reduced Ranching" alternative.

III. Issues

A. Economic analysis

Reducing or eliminating ranching and dairies from Point Reyes would have profound adverse economic consequences for the local and regional economy. These family ranches are essential to many local and regional businesses and represent an important cultural and economic way of life that extends beyond the Seashore. The ranches are a critical part of that cultural mosaic of estuaries, lagoons, ridges, hillsides, forests, and beautiful grasslands that make up the overall environment which in turn attract thousands of visitors every year. Without the stewardship of the ranching community, much of this landscape would not be there today. We ask that through the GMP and EIS process, the NPS, as a member of our local community, assess the positive and important economic benefits not only to the ranching and dairy families, but to our broader community and region as a whole. Local employment, changes to demographics, and local community well-being should be considered, as the ripple effect of ranching in the Seashore is vast. For example, our local school system is

heavily dependent upon the enrollment of students and tax base from ranching families and the ranch employees' families. These economic considerations should be a critical part of identifying the agency's preferred alternative.

B. Diversification & Increased Seashore Visitor Experience

The GMP/EIS process should evaluate a variety of additional agricultural and agricultural-related activities that could help to strengthen the area's economy, build on its tourism base, and bring high quality educational programs to the area, the latter two points of which increase the public's access to and interaction with the Seashore's ranch lands and cultural heritage. These complementary uses add to the sustainability of the ranches and ranching families while enhancing visitor experiences. Diversification can include selected planted or naturally occurring crops, additional livestock production, farm stands and retail sales, processing and value-added production, farm stays, farm educational tours, and expanded work with the school systems and 4-H organizations. The NPS visitor experience enhancements that would come from a comprehensive NPS educational/tourism program celebrating the cultural history of the area and its contribution to ranching, agriculture, and the resulting ecosystem services and environmental stewardship would be beneficial to NPS.

Consideration of on farm grown and stored livestock feed of silage and hay should be included in this examination. This long-standing farming practice combines the benefits of critical seasonal forage production with effective weed management, balanced herd nutrition and distribution management. It also reduces the need for imported supplemental feed and incentivizes effective on-site resource use and ranch resiliency.

We ask that non-commercial animal units continue to be allowed on a limited but expanded basis of 10 animal units per lease, to allow for production dedicated to feed family, employees, or other non-commercial uses like educational or charitable events. These non-commercial animal units can also serve as tools for prescribed impact use, such as evasive plant suppression, habitat restoration, and other resource management uses.

C. Succession

We encourage the GMP and EIS to review the all-important issue of succession to current and future leases. One overall goal of NPS should be to ensure that current families continue their stewardship of existing ranch and dairy lands, and provide a continuity of ownership going forward. But in the event that families choose not to continue ranching and dairying, and to continue this rich heritage and the environmental stewardship that accompanies it, we ask that existing families of current lessees be first considered and prioritized as successional lease holders. This continuation of ranching and agriculture at the Seashore should be a component of the GMP. Within this framework, we know the past cumulative experience and judgment of existing ranching families will provide important guidance to NPS.

D. Environmental Stewardship and Best Management Practices

We support implementation of best management practices (BMP) for ranching, dairy, and other agriculture activities. The GMP and accompanying EIS should evaluate these BMPs to insure their applicability, practicality, and success in protecting the environment and insuring economic viability, all of which are consistent with federal, state, and local requirements. As we have done frequently in the past, we are prepared to step forward to assist with important environmental projects ranging from preserving threatened species to improving water quality. We continue to be willing participants in considering, where feasible and necessary, other environmental measures that may add to the success of BMPs in protecting the natural values of the Seashore. With respect to methane and climate change, we believe the GMP/EIS should address how local ranches and dairies can play an important role in mitigating such impacts, potentially through carbon offsets and other payments for environmental services. Marin County and the State of California are leaders in this area and we welcome the opportunity to work with them as part of this effort. We also believe that a variety of public and

private partners may provide important technical and financial resources to assist in this effort. NPS and the ranching community at the Seashore can develop state-of-the-art approaches and serve as a model for programs elsewhere.

E. Operational Flexibility

Regular infrastructure maintenance and repair at the Seashore has often been delayed for extended periods of time in part because guidelines are unclear or nonexistent. The GMP should contain more specific guidelines to allow for critical work to be efficiently authorized by NPS in the future. In the coming months while the GMP progresses, we would welcome a working group to develop appropriate guidelines to assist the agency in more efficient and timely decision-making to allow effective management of weeds, fire fuels, protect water quality, livestock watering and distribution, and other field and ranch level concerns. We ask that preliminary processes and procedures be completed that satisfy regulatory requirements far in advance of potential projects, such as but not limited to archeology, sensitive habitat, cultural resources, natural resources, that will allow approved projects to proceed without delay. Each alternative should include a process for future decision making.

F. Tule Elk

We support managed populations of tule elk throughout the Seashore. We urge the NPS to adopt a GMP amendment that defines a broad range of management methods to prevent tule elk from over impacting any of the pastoral areas within the Seashore. We also ask that the NPS implement a tule elk maximum population threshold, much like Animal Units on ranches, that will trigger established efforts in population control, as defined by the GMP. The goal of the maximum population threshold would be to determine the number of tule elk that would create a thriving herd which remains compatible with competing resource uses, such that tule elk, other wild life, and agricultural activities are all provided for. We further ask that the tule elk be managed as a sustainable natural resource, and that partnership be established with the local USDA inspected slaughterhouse (Marin Sun Farms Inc, Petaluma CA) to implement humane culling best management practices that will allow culled tule elk to be processed and distributed for human consumption. Marin Sun Farms, Inc. is already approved by the United States Department of Agriculture (USDA) to process Exotic species and a precedent for humane USDA harvesting of elk has already been established in locations such as Maui, HI.

G. Leases

To ensure consistency and facilitate clear understanding of forthcoming requirements and operational issues, it would be helpful for the GMP to contain a draft lease template. We urge NPS to meet with individual ranchers to discuss past leasehold provisions and how new approaches can be adopted to reflect important on-the-ground considerations. We ask that incentives be added to leases that provide value-based reward in the form of a rent credit for exceptional environmental stewardship, infrastructure maintenance, visitor experience, ranch appearance and upkeep, and other incentives based on Seashore values.

We thank you for the opportunity to provide these initial comments and we look forward to working with NPS on all subsequent stages of the GMP and EIS.

Sincerely,
David Evans & Claire Herminjard

A large grey rectangular redaction box covers the signature area. Below the box, there are two horizontal lines, one of which is partially obscured by the redaction.

11/22/17

TO WHOM IT MAY CONCERN:

HAVE ANY OF US WALKED A BEACH AND WITNESSED CREEKS RUNNING GREEN WITH COW MANURE OR SEEN GREEN FOAM ON THE SHORE BREAK OF THE GREAT BEACH OF POINT REYES NATIONAL SEASHORE? I HAVE!

I HAVE HAD IT! NO MORE COWS OR COW RELATED EQUIPMENT IN OUR BEAUTIFUL PARK. IT'S CRAZY WE'VE GONE THIS FAR (150 YEARS) OF THIS POLLUTION AND STILL CONTINUE TO AVERT OUR EYES TO THIS CRIME TO NATURE IN A NATIONAL PARK, FOR CHRIST SAKE, AND GET AWAY WITH IT.

I LOVE OUR PARK. IT DESERVES MUCH BETTER. LET THE ELK ROAM FAR AND WIDE, BOLINAS TO BODEGA, FAIRFAX TO OCEAN. RE DUSE SPEED LIMIT TO 15 ON HIGHWAY ONE, SLOW DOWN AND SMELL THE CEANOTHUS.

WALTER HOFFMAN
BOLINAS



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POINT REYES NS



Walter Hoffman

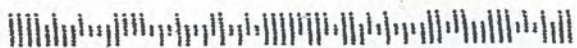
MarineMammalCenter.org

SAN FRANCISCO CA 941

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GMP AMENDMENT % SUPERINTENDENT
POINT REYES NATIONAL SEASHORE
1 BEAR VALLEY ROAD
POINT REYES STATION, CA
94956



JARED HUFFMAN
2ND DISTRICT, CALIFORNIA

COMMITTEE ON
NATURAL RESOURCES
WATER, POWER, AND OCEANS – RANKING MEMBER
FEDERAL LANDS

COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE
HIGHWAYS AND TRANSIT
WATER RESOURCES AND ENVIRONMENT

November 21, 2017

Cynthia MacLeod, Acting Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Dear Superintendent MacLeod:

Thank you for the extension for public comment for the Point Reyes National Seashore and Golden Gate National Recreation Area north district General Management Plan (GMP) Amendment, and for this opportunity to provide my comments. Updating the management guidance for more than 28,000 acres of National Park Service (NPS) lands including all lands currently leased for ranching is an important endeavor, and I am pleased to see you are planning a robust process with plenty of opportunities for public participation.

For over 150 years, agriculture has been a vital part of the fabric of West Marin. That includes the historic ranches and dairies in the Point Reyes National Seashore (Seashore), which contribute to the special history, character, and appeal of this magnificent national park unit. The NPS recognized this in designating the ranches on the Point and in the Olema Valley as Historic Districts. They are vernacular cultural landscapes that evolved through use by the people whose needs and activities shaped them. While ranching practices continue to evolve, the fundamental distinctive characteristics of these landscapes have existed for many generations and have become an integral part of the cultural and scenic resources the NPS is charged to conserve unimpaired as part of its mission.

These ranches and dairies also provide broader benefits: they help preserve agriculture outside the park boundaries by ensuring that our regional agricultural economy, consisting almost entirely of small-scale agricultural operations, remains large enough to support the facilities and services that are necessary for most of these ranches, dairies, and farms to stay viable.

The statutory history of the site reflects that Congress showed great vision by providing for ranching to continue within the Seashore to ensure that future generations would be able to experience the park's unique working landscapes. Most recently, in November of 2012, the Secretary of the Interior reinforced the commitment of the federal government to this vision by directing the NPS to pursue the issuance of agricultural lease / special use permits for renewable terms of up to 20 years. That vision, and the many benefits it represents for the park and our region, is worth protecting. I am writing to once again express my firm commitment to ensuring that these historic working ranches remain a permanent part of the Point Reyes National Seashore.

Reducing conflicts between the reintroduced Tule elk herds and the park's historic ranches and dairies is essential for NPS to maintain the historic, cultural, and scenic resources and values of the Seashore. The successful return of the majestic elk to the Point Reyes National Seashore is good for park visitors and speaks to the health and abundance of the park's natural environment, but the growing number of elk taking up permanent residence on working ranches and dairies -- mingling with cattle and potentially acquiring and spreading cattle-borne diseases, damaging fences and equipment, and competing with cows for carefully managed organic forage on ranch lands -- is a serious problem for ranchers now and will certainly lead to impairment of the historic values of the working ranches. Moreover, as unmanaged elk inevitably replace ranches, the scenic values of the Pastoral Zone will suffer unacceptable impacts leading to impairment.

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SAN RAFAEL, CA 94901
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206 G STREET, #3
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WEBSITE: huffman.house.gov

Congress of the United States
House of Representatives
Washington, DC 20515-0502

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POINT REYES NS

November 21, 2017

Letter to Superintendent MacLeod

Page 2

While I appreciate that the "initial proposal," the *Continued Ranching and Management of the Drakes Beach Tule Elk Herd* alternative, illustrates the NPS' interest in retaining ranching, I do not support the management of elk provided in this alternative. Given the current resource challenges facing NPS, such as the nearly \$12 billion backlog of deferred maintenance and the proposed 13% cut in President Trump's budget, it is unrealistic and naïve to think NPS can manage an elk herd to a particular size. The very presence of a free range herd on the ranches and dairies shows a lack of capacity to manage them well in the first place. I understand that Secretary Salazar argued that the 1998 Elk Management Plan did not contemplate Tule elk in the Pastoral Zone as the reason for the unfettered growth of the herd in the ranching areas, but the NPS should not resign itself to accepting the establishment of a third Tule elk herd on ranch lands.

The NPS should endeavor to protect both free range Tule elk and the historic ranches and dairies through strategies to ensure permanent and effective separation of the elk from the working ranches in the Seashore. Tule elk belong in the fenced wilderness reserve on Tomales Point and in the unfenced Philip Burton Wilderness, not in the ranching lands. With consideration for a phased reduction of elk, NPS still has time to avoid establishment of a herd in the ranching areas. The NPS should give serious consideration to exploring all options to remove animals from the ranches, paying careful attention to the best science and environmental practices. That is why I prefer the *Continued Ranching and Removal of the Drakes Beach Tule Elk Herd* alternative.

We are lucky to have wonderful resources and existing local expertise in this community provided by the Natural Resource Conservation Service as well as our Marin County Department of Agriculture, the Marin Resource Conservation District, and UC Extension, which can contribute knowledge about best practices and environmentally-sound agricultural practices. The ranchers have worked hard to showcase stewardship practices to the community at large and to educate them about the challenges facing small family ranchers, most of whom now operate organic ranches and farms. The positive relationships that formed during the former Ranch Management Planning Process have only grown stronger over time and are a reflection of the local community support for preserving the cultural practices these working ranches provide. I fully expect these community resources will continue to be available for NPS during this planning period and beyond.

I understand the challenges presented by the litigation and July 2017 settlement agreement to the ranchers and Park Service, but I believe long-term leases that protect the park's environmental values and which sustain the historic ranches and dairies as an essential part of the cultural and scenic resources at the Seashore should prevail. The loss of ranching would end a valued cultural practice that is one of the fundamental purposes of the Seashore and destroy the scenic beauty and natural character of the area. The iconic scenic view of pastures in the Seashore are not natural; without being grazed by cattle, or managed with fire as the Coast Miwok residents did prior to the ranches, the rich visual mosaic of pasture, rangeland, scrub, forest, and varied land forms will be greatly diminished. That result can already be seen in areas where cattle grazing ended within the past few decades.

As this process moves forward, I will continue to engage as a partner to ensure this process leads to long-term solutions that conserve park resources and values, preserve our historic ranches as part of that cultural resource, and support the free range Tule elk.

Sincerely,



JARED HUFFMAN
Member of Congress

Congress of the United States
House of Representatives
Washington, DC 20515-0502

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NOV 17

PM 5

Paul Hoffman M.C.

Cynthia MacLeod, Acting Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956



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Rick Lafranchi

2017 NOV 22 AM 11:30

POINT REYES NS

To whom it may concern,

I'm writing this letter in support of Continued Ranching and Managing the Elk Herd at Drakes Beach.

I've spent my entire life closely connected with West Marin agriculture. Over the years I've come to realize the amazing legacy connected with this region.

I've learned the pastures in the Point Reyes National Seashore are arguably the most productive sustainable pastures in the world.

I've learned the cattle ranches and dairies of the Point Reyes National Seashore are among the most successful sustainable operations of their kind in California.

I've learned the ranches of the Point Reyes National Seashore generate well over 100 million dollars of economic activity annually.

I've learned the families on the ranches of the Point Reyes National Seashore are an important part of the fabric of the local communities. From patronizing and supporting local schools, local churches and non-profits the ranchers of the Seashore along with their primarily latino employees are a critical component of the local culture.

37 years ago the Marin Agricultural Land Trust was founded to preserve West Marin agriculture. Since then MALT has protected from development nearly 50,000 acres on 85 ranches, with more to come. This has been a huge commitment to supporting and enabling West Marin ag to become a viable, vibrant, cutting edge ag economy utilizing the unique sustainable strengths of this region.

Anything reducing the activity on the ranches of the Point Reyes National Seashore would seriously threaten the viability of the rest of West Marin Agriculture. This in turn could cast the mission of MALT as irrelevant and potentially open up West Marin to development.

Every region provides a unique opportunity to realize the strengths inherent within. The Presidio offered by improving and leasing the buildings therein the ability to protect historic vistas, trails and waterfronts.

The Point Reyes National Seashore can be a win, win by generating revenues from the existing ranches to offset the costs of managing the Elk Herd and stewarding the lands of the Seashore.

A couple more requests I have for your consideration:

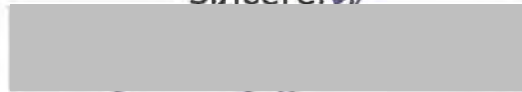
Please consider partnering with MALT to steward the ranches. MALT has a long history of monitoring and managing Marin ranches. MALT is very aggressive in demanding it's easement holders uphold the important elements of responsible stewardship.

I also ask for the Park service to consider making a huge commitment to Marin Agriculture by designating agriculture in the park the equal of MALT properties by being dedicated to agriculture in perpetuity. Along with this I ask for the existing leases to be transferable outside of the current tenants. This would forever establish West Marin as a thriving sustainable agricultural region.

The Point Reyes National Seashore Ranches could and should be the leading examples of cutting edge environmentally sound agriculture for our Nation.

As you can see the ranches in the park are far more important to the local culture, economy and environment than one may realize. They are critical to the future of an entire region.

Sincerely,

A solid grey rectangular box redacting the signature of Rick Lafranchi.

Rick Lafranchi



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Assembly California Legislature

MARC LEVINE
ASSEMBLYMEMBER, TENTH DISTRICT

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2017 NOV 28 AM 3:53
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November 22, 2017

Cicely Muldoon, Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Dear Superintendent Cicely Muldoon:

We are writing to comment on the Point Reyes National Seashore Management Plan Amendment. We support sustainable ranching in the park that strikes a balance: one that preserves the environmental habitat while supporting those whose livelihood and family legacy is built upon sustainable farming practices in the Seashore.

Point Reyes National Seashore's creation was due to an innovative agreement with local ranchers, and without their support over a half century ago, the public would not have this jewel to explore and enjoy. Not only are the ranches a vital part of the park's history, these family farmers and dairies remain an important part of Marin's modern-day agricultural economy. West Marin farming operations generate an estimated \$25 million per year, which is a significant economic driver in the North Bay Area.

Our preferred alternative allows ranching to continue on the land, grant long-term leases which provide desperately needed stability for these family farmers. The short-term permitting process currently places unnecessary stresses on the twenty-four families who operate in West Marin. Twenty year leases will allow ranchers and farmers to focus on the operation of their family-run businesses, rather than the complicated permitting process they currently navigate. Not to mention the significant challenges families face when securing agriculture related loans.

Ranchers should have a reliable, streamlined permitting process with long-term leases which eases the burden on families, allows them to invest in their businesses and contribute to the local economy.

DISTRICT OFFICES: 3501 CIVIC CENTER DRIVE, SUITE 412 • SAN RAFAEL, CA 94903 • (415) 479-4920 • FAX (415) 479-2123
11 ENGLISH STREET • PETALUMA, CA 94952 • (707) 576-2631
50 D STREET, SUITE 301 • SANTA ROSA, CA 95404 • (707) 576-2631



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Please feel free to call our office at (415) 479-4920 (Levine) and (415) 479-6612 (McGuire) if we can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Marc Levine". The letters are cursive and fluid.

MARC LEVINE
California State Assembly

A handwritten signature in black ink that reads "Mike McGuire". The signature is stylized, starting with a large "M" and ending with a flourish.

MIKE McGUIRE
California State Senate

Assembly
California Legislature

MARC LEVINE

ASSEMBLYMEMBER, TENTH DISTRICT
DISTRICT OFFICE
3501 CIVIC CENTER DRIVE, SUITE 412
SAN RAFAEL, CA 94903



POINT REYES NATIONAL SEASHORE
1 Bear Valley Rd
Point Reyes Station, CA 94956



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94956-979999



LUNNY RANCH

November 22, 2017

Cynthia MacLeod
Acting Superintendent
Point Reyes National Seashore
One Bear Valley Road
Point Reyes Station, CA 94956

Re: PRNS GMP Amendment

Dear Superintendent MacLeod,

The Lunny Ranch is a member of the Point Reyes Seashore Ranchers Association (PRSRA) and fully endorses the points made in the PRSRA scoping letter. This letter is meant to focus more specifically on the Lunny Ranch (aka the Historic G Ranch).

During the Shafter era, the same time frame the current historic working landscape designation is meant to protect, the G Ranch, similar to other ranches on the Point Reyes Peninsula, was quite diversified. A dairy, many large barns for cattle and horses, a slaughterhouse to process cattle, sheep and hogs, a cheese processing plant, pastures, hayfields, and worker housing all existed at the G Ranch. As thousands of acres were under cultivation on the peninsula for artichokes, beans, peas and other vegetables, it is quite likely that these crops were grown at the G Ranch because most of the ranch is level with deep soil.

Post World War II, with the availability of inexpensive shipping, the landscape at Point Reyes began to change. Ranchers realized that they did not need to depend on the local food system to make a living. More money could be made by concentrating all effort on the dairy, leaving traditional diversification behind. The local diversified farms turned into a non-diversified dairy monoculture - shipping feed in from distant locations and shipping milk to distant markets. This same transition to large scale, single commodity agriculture was happening all over the country. The Congress and the NPS created PRNS just after the conversion to a cow-only, mostly dairy monoculture.

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2017 NOV 22 AM 10:47
POINT REYES NS

Before the time that the Lunny Ranch (G Ranch) was purchased by the federal government in the 1970s to include in the Pastoral Zone of PRNS, the Lunny family enjoyed hunting, fishing and water skiing (very occasionally) at Abbotts Lagoon and the Lunny's cattle grazed from the edge of Drakes Estero to the edge of Abbotts Lagoon. The Lunny family also had an annual 4th of July party on the edge of the lagoon. The beef cows preferred calving in the clean sand in the sand dunes. We milked about 250 cows at our dairy and we still had a few pigs around from the time when every ranch had pigs. We could add any species of farm animal we wanted – for commercial sale of meat, for our own consumption or for management of invasive brush. We made decisions about stocking rates and stocking densities that would utilize available forage, but never overgraze. We took excellent care of our pastures and rangelands because our future depended on it. When the Seashore was established, the Lunny Ranch had approximately 500 acres in crop production. We plowed, disked and planted oats, vetch, beans and other forage crops and stored and fed the feed as silage. We had a makeshift runway where fixed wing aircraft and helicopters would land, load with fertilizer, and spread on the crop land. Much of the several thousand tons of silage produced on the Lunny Ranch was sold to neighboring dairies. During this time, if a building needed repair, we repaired it. If a waterline failed, we replaced it. If we needed a water trough in a new location, we put it there.

Ranching at PRNS is very different today. We are no longer allowed to use the sand dunes or Abbotts Lagoon, we are not allowed to make our own decisions about stocking density or stocking rates, we are not allowed to cut brush, we are now limited to only 180 acres for crop production, we are not allowed to choose which livestock to raise on our pastures, we are not allowed to choose our crop type, we are not allowed to sell excess forage to our neighbors, we are not allowed to sell our products to the public from our farm location, we are not allowed to repair our barns or other buildings, we are not allowed to replace water lines, we are not allowed to install new fences and we are not allowed to implement other NRCS approved BMPs. A few of these activities are currently possible following a long, tedious and usually overly restrictive and sometimes duplicative environmental review special permitting process. The Lunny family respects that processes need to exist and processes need to be followed to protect the environment of the Seashore. We ask that this EIS process evaluates the benefits of having a plan that allows a programmatic approach to approvals for the ranchers. Once implemented, such a seashore-wide approach could save PRNS time, taxpayer dollars and ranchers' resources.

It is our understanding that NPS policy does not require that activities in a cultural landscape present at the time of purchase be frozen in time, ignoring and/or disallowing the rich historical activities and/or the need to allow modernization and change from that moment in time. We have been very pleased with the fact that the NPS has allowed significant changes, upgrades construction and development to be undertaken over the years by the ranchers, which has allowed seashore ranches to better compete in commodity markets. Since the 1960's when PRNS was created, family farms generally strove to compete in a nationally price driven commodity based agriculture, competing with large scale industrial agricultural operations.

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

The Lunny family appreciates the PRNS attempt to create a range of alternatives to use in this EIS. Unfortunately, partially due to the settlement agreement requirements, the range of alternatives is not balanced. We understand that there should be a no action alternative. The problem is that the action alternatives include a very extreme alternative that would end ranching altogether. To honestly show a full range of alternatives, the NPS should include an alternative that prioritizes cultural resource protection and ranching. None of the action alternatives prioritize ranching. All action alternatives include elk on the pastoral zone and none consider restoring ranching back into areas where grazing was eliminated by PRNS and where grazing would be beneficial to the grasslands and gateway communities if re-established. This includes areas in the Olema Valley where fuel loads are increasing, and fuel ladders are forming up to the forested ridge abutting private land. We appreciate that the PRNS initial proposal includes ranching with 20 year permits, but are concerned that ranching may not remain viable because of the elk conflicts built into this proposal. The Lunny family still interprets the 1998 Elk Management Plan the same way that PRNS did in 2001 (see attached copy of PRNS document "A Year in Review"), only 3 years after the plan was completed.

Upon reading the PRSRA scoping letter, it is evident that all seashore ranchers are encouraged and excited to see the PRNS focus on preserving the Shafter era diversified agriculture as well. This gives new hope that our ranches and farms will survive as viable businesses into the future. Without allowing the seashore ranchers to recreate a small portion of the historic diversity and reasonable operational flexibility, NPS would actually be contributing to the elimination of the ranches and the loss of an important cultural resource.

The Lunny family has specific plans for the Lunny Ranch that, if necessary, this EIS should evaluate so that PRNS can approve these changes in a long-term lease. The Lunnys plan to return the ranch to a diversified farm consistent with the time frame the National Historic Register means to preserve and protect, 1860 to 1960, also described as the Shafter era. While doing so, recognizing that its location is inside the highly visited working landscape of a national seashore, all improvements will be ecologically responsible, compatible with public visitation, public viewing, on-farm tours and educational opportunities. The Lunny Ranch will become a current time, viable reflection of what originally protected Point Reyes and what made Point Reyes worth protecting into the future.

1. Restore the dairy operation. The Lunnys operated a Grade A dairy for most of its tenure on the G Ranch. The dairy was closed and the operation was converted to a beef operation due to a downturn in milk prices in the late 1970s. Now, as the economic realities have changed dramatically, the highest and best use of the G Ranch includes a dairy. With a dairy, it will more closely resemble the Shafter era ranching on Point Reyes. Issues to consider are:
 - a. This use existed on the G Ranch during the Shafter era;
 - b. The dairy would be grass-based, reducing the need for imported feed;
 - c. Pollution control - Almost the entire necessary pollution control infrastructure is still in place. The manure sump near the dairy still exists, the pipeline out to the manure lagoons still exists and the manure lagoons still exist for the minimal amount of manured water from milking barn and concrete corrals in need of containment;
 - d. A composting barn is proposed and could be constructed in the same footprint where a barn once was. This barn will house the small milk herd during the wet season, all manure will be composted and GHG emissions from a manure lagoon will be avoided and storm water runoff water quality will be protected. This EIS should carefully examine the environmental benefits of a composting barn, including

the reduction of GHG production by avoiding manure solids from entering the manure lagoon;

- e. All bedding for the composting barn would be grown on farm within the currently permitted organic forage production fields;
 - f. Concrete cattle handling corrals still exist;
 - g. Milking barn still exists, but the interior will need to be remodeled;
 - h. Feeding areas and feed storage areas still exist; and,
 - i. PRNS has already allowed other previously closed dairies to resume operations.
2. Begin milk processing to make butter. Issues to consider are:
- a. This use existed on the G Ranch during the Shafter era;
 - b. The Point Reyes Peninsula was known for its high quality butter produced on-farm;
 - c. The grass-fed milk produced on the Lunny Ranch will most closely replicate the famous butter once produced on these ranches;
 - d. The Lunny family has extensive experience with on-farm processing within the PRNS;
 - e. On-farm processing is not a new use at PRNS. On-farm processing has been permitted within PRNS since PRNS was established.
 - f. The visiting public loved to see the processing of food produced within the seashore and would certainly enjoy experiencing the historic butter processing;
 - g. This would require new construction within the existing building complex, or ranch core, to house a butter processing facility;
 - h. This would be an exciting historic use revived and could be shared with the visiting public;
 - i. This EIS must treat this on-farm processing as a continued use within PRNS with simply a ½ mile change in location with the same permitted PRNS operators. The change in use that should be contemplated within this EIS is
 - i. Different product being processed
 - ii. Less traffic is expected.
 - iii. There are no other changes to the human environment to be expected for this relocation.
3. Enhance row crop production. Issues to consider are:
- a. This use existed on the G Ranch during the Shafter era;
 - b. This use currently exists on the G Ranch;
 - c. 24 acres of silage crop land will be converted to row crops, reducing the silage crop area and increasing the row crop area from the current

- 6 acres to about 30 acres which represents less than 3% of the G Ranch;
- d. Production will be located on land that is currently authorized for crop (forage) production, no new areas will be converted to cropland;
 - e. Existing silage crop land closest to the ranch core with excellent soils will be selected for conversion;
 - f. Production will focus on crop species that were historically grown during the Shafter era, including artichokes, grains, beans and peas; and,
 - g. Production will include dry-farming techniques.
4. Restore small scale hog production. Issues to consider are:
- a. This use existed on the G Ranch during the Shafter era;
 - b. The number of sows on the ranch would be limited to 8 and would be kept in the ranch core area;
 - c. The hogs will utilize the whey from the butter processing and the waste vegetables from the row crop operations; and,
 - d. This use will avoid disposal of the above ranch resources.
5. Use goats or sheep to improve pasture and rangelands. Companion grazing with multiple species and leader – follower grazing regimes with different ruminant species have proven to be successful tools for rangeland preservation. The Lunny Ranch requests that this rangeland management tool be allowed at the Lunny Ranch. Issues to consider are:
- a. Goats and sheep will eat weed species that cows will not eat;
 - b. Allows certified organic ranches to manage invasive plants without the use of herbicides;
 - c. Provides other certified organic meat products to help augment the ranch income;
 - d. Can be deployed carefully to target problem invasive species;
 - e. More closely replicates the diversity found on these ranches during the historic period PRNS is entrusted to protect;
 - f. The Lunny Ranch proposes to limit goats or sheep to a substitution of up to 10% of beef cattle or dairy cow animal units (AU). (There are various animal-unit formulas, but they typically consider 5 sheep or 6 goats to be one AU, depending on the size of the breed.); and,
 - g. Other than fencing, no predator controls will be used.
6. Restore small scale chicken production. Issues to consider are:
- a. This use existed on the G Ranch during the Shafter era;
 - b. The number of birds would be limited to 500;
 - c. Both eggs and meat will be produced;
 - d. Chickens will be pastured;

- e. Chickens will be used to enhance pasture fertility and health;
 - f. Chickens will be used to help control parasites and weeds within certified organic pastures;
 - g. Both the meat and eggs will help augment ranch income; and,
 - h. Chickens will be closed in at night and other than fencing, no predator controls will be used.
7. Build a new composting barn to house the milking cows during winter. Issues to consider are:
- a. Water quality improvements;
 - b. Rangeland protection;
 - c. Housing for animals during inclement weather;
 - d. Reduction of stress on animals;
 - e. Allows the Lunny Ranch dairy to compete with other dairies;
 - f. Will reduce GHG emissions;
 - g. Would facilitate carbon sequestration in G Ranch soils by appropriate application of on-farm compost;
 - h. Would reduce the need to spread raw manure;
 - i. Would reduce manure solids in manure lagoon thereby reducing GHG emissions;
 - j. Would be construction similar to what has been allowed on other seashore ranches; and,
 - k. Would be located in the Ranch Core in the exact same location that a barn previously existed.
8. Build a roof over the existing feed storage and feeding area. Issues to consider are:
- a. Protection of feed from rain damage;
 - b. Keeping birds, including ravens, away from the livestock feed;
 - c. Allows the Lunny family to purchase feed at the right time if a safe, dry storage area is available; and,
 - d. Would not change the use of the area.
9. Begin direct on-farm sales of Lunny Ranch farm products as well as farm products produced on other seashore ranches. Issues to consider are:
- a. Provides opportunities for the visiting public to connect with the working landscapes. The visiting public loves the opportunity to experience and taste the bounty of the Seashore;
 - b. Provides an opportunity for the visiting public to meet the farmers and ranchers personally;
 - c. Provides educational opportunities;
 - d. The Lunny family has extensive experience with on-farm sales within PRNS;

- e. There is plenty of safe parking at the Lunny Ranch;
 - f. On-farm sales of farm products are not a new use at PRNS. On-farm sales have been permitted within PRNS since the establishment of PRNS;
 - g. Provides additional income to the Lunny family by capturing the retail prices of our farm products instead of only commodity wholesale prices;
 - h. Provides other Seashore ranchers additional income by selling their farm products at the Lunny Ranch on-farm sales location;
 - i. Requires minor new construction within the ranch core; and,
 - j. This EIS must treat this on-farm sales use as a continued use within PRNS with simply a ½ mile change in location with the same permitted PRNS operators. The change in use that should be contemplated within this EIS is
 - i. Different products are being processed
 - ii. Minimal construction required
 - iii. There are no other changes to the human environment to be expected as a result of this relocation.
10. Continue to produce and harvest on-farm forage crops. Issues to consider are:
- a. This use existed on the G Ranch during the Shafter era;
 - b. This practice is vital to the Lunny Ranch;
 - c. The use is currently authorized on the Lunny Ranch;
 - d. The Lunny Ranch will work with PRNS staff to optimize harvest timing;
 - e. The 180 acre maximum per year currently allowed for forage crops would be reduced by the number of acres used for row crops, not to exceed 24 acres; and,
 - f. This use is still occurring.
11. Replace 2 worker residences within the ranch building complex ranch core. Issues to consider are:
- a. This use existed on the G Ranch during the Shafter era;
 - b. 2 housing units were lost at the Lunny Ranch since the establishment of PRNS;
 - c. The housing units could be placed where the original worker housing was;
 - d. Most of the other ranches within PRNS and GGNRA have more farm worker housing than the Lunny Ranch;
 - e. Housing will meet current health and safety codes;
 - f. The septic system will be upgraded;

- g. Provides rare, affordable, necessary farm worker housing in West Marin;
 - h. Due to extremely high home values, it is difficult or impossible for farm workers to find a home to rent or buy within 40 miles of the Lunny Ranch;
 - i. Allows the Lunny Ranch to compete for good employees; and,
 - j. Allows for the necessary staff for round the clock emergency work often encountered on a working ranch.
12. Farm stays have become important to urban visitors as well as to ranchers and farmers for many reasons. The Lunnys are very pleased that PRNS has already allowed seashore ranchers to undertake this activity within PRNS. The Lunnys request the approval for this activity as well. As PRNS has already authorized this use, it is unclear whether it needs to be evaluated in the current EIS. This EIS should evaluate the benefits to the visiting public if they are allowed to stay on and learn about a working historic farm at PRNS.
13. Organized farm tours. The Lunny Ranch would like to work directly with the interpretive staff at PRNS to develop a farm tour program at the Lunny Ranch. This EIS should fully evaluate the lack of interpretive services currently available to educate the public about the historic ranching. It should also evaluate the public benefit that could result from a joint effort with PRNS, the Lunny Ranch and other interested seashore ranchers if a collaborative educational program were created.
14. Operational Flexibility. To operate a successful ranching or dairying business, the rancher needs to be able to implement best management practices and make operational decisions quickly. Weather conditions and other factors may necessitate quick reaction by the ranchers to protect natural resources and to protect their businesses.
- a. Brush Removal – Invasive brush has been controlled by humans in this region for millennia. For the past approximately 70 years, the Lunnys have controlled brush on the G Ranch by grazing, burning, dozing and mowing. The Lunnys request permission to continue this vital activity – specifically, mowing.
 - b. Water and pasture Improvements – The Lunnys request that the PRNS re-authorize the implementation of the NRCS approved water and pasture planting project designed for the Lunny Ranch and

approved by PRNS. (See attached NRCS Water Development description.) Once implemented, all water on the Lunny Ranch will be moved by solar pumping systems and gravity, new red-legged frog habitat will be developed, wetland and riparian areas will be protected, cattle water troughs will be moved away from sensitive habitats and certified organic cattle will be provided cleaner water. This EIS must evaluate the multiple environmental and ecological benefits of this completed plan, including reduced energy use, improved habitat, and reduced livestock impacts on sensitive resource areas.

c. Composting, using feedstocks from both on and off farm sources, and compost spreading. The Lunnys plan to continue to spread compost (from outside sources as well as on farm source) on silage producing areas, on vegetable producing areas, as well as on rangelands and pastures used solely for grazing. This EIS should evaluate the benefits of on-farm compost production and compost spreading, including carbon sequestration, reduced reliance on other fertilizers and the reduction in GHG emissions.

d. Carbon Farming – The Lunny Ranch applied for a grant for Carbon Farm Plan with the Marin County Resource Conservation District (MRCD). The Lunny Ranch was successful in obtaining the grant. The Lunny Ranch looks forward to working with the MRCD and its carbon farm plan partners to create a plan to sequester more carbon in the soils of the Lunny Ranch. The practices included are all practices known to benefit the natural resources and most have already been allowed to be implemented on ranches within the seashore by PRNS. This EIS must evaluate creating a clear path to implementing the stewardship practices included in the carbon farm plan without delay. This EIS should fully evaluate the carbon benefits – the capture of atmospheric CO₂ and the increased soil carbon that results from implementing these practices. The EIS process should work with MRCD to determine the CO₂ equivalent that the Lunny Ranch can sequester by implementing the plan. The EIS should also evaluate how implementing carbon farm plans on Seashore ranches could help the PRNS meet it's carbon emission reduction goals.

15. Greenhouse Construction – Although the Lunnys have temporarily fallowed the 6 acre irrigated row crop garden, for the past decade, the Lunnys have depended on outside sources for organic vegetable starts. Star Route Farms in Bolinas has provided many of the plants grown in the current 6 acre vegetable crop area on the Lunny Ranch. Many plants do not do well when started by seed in the field. An on-farm greenhouse has become an economic necessity. It will become even more important when this EIS process approves the small vegetable production area on the G Ranch to increase from 6 acres to 30 acres. The Lunnys request permission to build a small greenhouse on the G Ranch. The EIS process should consider the fact that this small increase in acreage (24 acres) represents only 2 to 3 percent of the Lunny Ranch. This is properly viewed as small scale, historically appropriate diversification with all its cultural and environmental benefits over monoculture. Historic records demonstrate that thousands of acres were planted with vegetables on the seashore ranches. Even if many ranchers elected to plant 30 acres each (which they will not), it would total only a fraction of what existed during the Shafter era. The EIS team should also acknowledge the fact that the Lunnys intend to simply change crops on 24 acres of silage fields (crop land) to vegetable fields (crop land). This should not be considered a change in use; it should be recognized as simply a change of crop. The Lunnys are not asking to convert native, untouched rangelands to crop land. The Lunnys recognize that there will be 24 acres less to continue silage crop production. This EIS should evaluate the addition of a greenhouse to start certified organic plants for the Lunny Ranch within the core area of the Lunny Ranch.
16. Foundation Repair to Dairy Barn – the south end of the milking barn on the G Ranch is settling and is causing other structural damage. The Lunnys request permission to support the foundation and to make the necessary structural repairs. All work will be performed by licensed contractors upon PRNS approval. This work is necessary to keep the building standing. It is also a necessary step in repairing the dairy barn and readying it to resume milking operations.
17. Wall Replacement and New Roof on shop containing the ranch electrical service. The Lunnys have made several requests to PRNS to get this building repaired. PRNS has not given approval. The Lunnys have

requested permission to make the necessary repairs to this building with the Lunny Ranch paying for the repairs. All work will be performed by licensed contractors. The Lunnys have consulted with 2 contractors who have agreed that in the repairs are not made immediately, the building is likely to fall to the ground making repairs impossible. This EIS should review the record, confirm the repeated requests, confirm the offer by the Lunnys to pay for the repairs, and to confirm that the building will collapse soon if not repaired. The EIS team must also evaluate the financial damage to the Lunny Ranch if this building collapses, including increased cost to replace instead of repair existing, the loss of electrical service to the ranch core, the loss of electricity to the homes, the loss of electricity to water pumps delivering water to livestock, the cost and time to design and permit a new electrical main service at another location on the ranch, the time it will take for the County of Marin to permit and inspect the new service, the time PG&E to approve the new service and to install the power to a new location the cost to have an electrician install the new electrical main service in a new location and the time and cost to have an electrician re-route the entire ranch electrical distribution system to a new location.

18. Cyclic Maintenance vs. Capital Improvements – Currently, the PRNS SUP describes and defines cyclic maintenance and makes clear that cyclic maintenance is the responsibility of the lessee (the rancher) and capital improvements are the responsibility of the Lessor (PRNS). The above described construction projects (barn foundation, shop repairs) would fall into the capital improvement definition. The Lunny family requests permission to perform and pay for the improvements and that the cost of the improvements are reimbursed over time by PRNS via permit fee reduction. This EIS should consider where responsibilities lie for ranch improvements maintenance, include it in the new 20-year renewable permits, and describe how the parties will be required to comply.
19. Lease / Permit – This EIS should consider the benefits of issuing 20 year or longer renewable permits. Given compliance with the terms, the permits could be renewed after each 5-year review, for 20 years. Ranchers would always have at least 15 years left on the lease. This EIS should evaluate the benefits, including:

- a. It would show a commitment by NPS and DOI that the historic ranching is important and will remain at PRNS;
- b. It would allow for long term ranch planning;
- c. The Lunnys would be more likely to invest in infrastructure repairs;
- d. The Lunnys would be more likely to invest in long term resource conservation practices including the carbon farming practices;
- e. The next generation of Lunnys would more likely be interested in continuing the Lunny Ranch tradition because of more security;
- f. Banks are more likely to offer loans for ranch projects; and,
- g. Agencies that require long-term monitoring agreements for resource conservation grants, including the Marin Resource Conservation District and the Natural Resources Conservation District, are more likely to award grants to the Lunny Ranch and other seashore ranchers, benefitting the natural resources found within the ranchlands at PRNS.

20. Lease / Permit valuation needs to be considered by the EIS because the Lunny Ranch, after implementing this plan to improve visitor experience, resource conservation and historic activities, will also increase its gross farm income. Currently, the PRNS has no process for lease valuation other than a farm appraisal and forage usage (AUM consumption). The Lunny Ranch proposes that PRNS implement an agricultural lease valuation similar to the Cayuhoga National Park. Here, we ask that the EIS consider the effects of charging a minimum annual rent / permit fee equal to the current fees charged to the ranchers. As separate calculation could be a 3% of gross farm income charge for rent. For example, if 3% of gross farm income is less than the current rent, the rancher pays the minimum rent. If 3% of gross farm income is higher than the current (minimum), the rancher pays the higher - 3% of the gross farm income. The EIS could consider the public benefit of charging the ranchers with the most intensives land uses more rent. The EIS could analyze how this method of charging rent / permit fees could:

- a. Charge more rent to those of us that would like to add value to our farm products through diversification;
- b. Keep the current rent stable for ranches with small gross farm income;
- c. Be more fair to all ranchers if all ranchers were paying the same percentage rent over a minimum;
- d. Be revisited and adjusted for changes in gross farm income every 5 years;
- e. Allow ranchers and the public to know what the rates are and they are applied evenly;
- f. Allow ranchers to plan, knowing how rent would be affected by diversification and other management changes
- g. Calculate gross farm income, how the information can be obtained and how the information, tax returns or other, can remain confidential;
- h. Eliminate the need for expensive appraisals and inappropriate charges based on useless AUM calculations; and,
- i. Increased rent, or rent over the minimum rent, could be made available to ranchers from PRNS for resource conservation projects.

The Lunnys recognize that most of the above can be approved without a formal NEPA analysis just as PRNS has done in the past. Nevertheless, because new, comprehensive, long-term permits are being developed, the Lunnys want to be sure that each of the items raised by PRSRA and the Lunnys during scoping, are authorized and incorporated in the new Lunny Ranch – Historic G Ranch lease / permit. The Lunnys appreciate this opportunity to further explain our ranch plan and to further describe what is needed to fully execute an environmentally conscious, viable, small scale historically and ecologically appropriate diversified farm for the benefit of the Lunny family, the community, the visiting public and the local food system.

This simple plan, once approved, would allow the Lunny family to restore an exciting, diversified, profitable, visitor-friendly farm that more closely resembles the Shafter era ranching than anywhere else in the seashore, while protecting the natural resources at the same time.



If PRNS allows the Lunny Ranch plan to come to fruition, the average visiting public passing by the Lunny Ranch is not likely to notice any change. They would have to look carefully to notice the composting barn and greenhouse in the core area. Only a local resident or a regular visitor could pick out the minor changes. Even the regular visitor is likely unaware that there were several large barns on the G Ranch that are now gone, and that the new structures simply are replacing a small portion that has been lost over time. They probably wouldn't notice the increased soil carbon offsetting their GHG produced during their visit to the seashore by automobile. The new seashore visitors wouldn't probably notice that more members of the Lunny Family are now working on the farm and staying connected to the community they were raised in. The new visitor may not realize that this ranch is now more fully connected to local food system and its diversification makes it much more likely that it will survive through changing economic times and changes to the pasture productivity due to climate change. This EIS must fully evaluate the enormous benefits that would result from this complete plan.

A new or returning seashore visitor is more likely to notice the availability of on-farm PRSRA rancher farm products, the availability of farm tours in collaboration with PRNS staff, a chance to watch organic cows being milked, a chance to experience the historic butter processing on farm and whey utilization with a few hogs, some vegetables growing with farm-produced compost soil amendment – all a small demonstration of the true historic use the historic G Ranch on the Point Reyes Peninsula. This EIS should consider the fact that PRNS and the NPS have allowed all or most of these uses at PRNS and at other units of the NPS. The EIS should evaluate the restoration of these historic ranch practices with the understanding that PRNS was created because of the ranchers. PRNS is a national seashore and not a national park, where parks were created for quieter, contemplative uses and seashores were created for more public activities, recreation and historic uses. PRNS is responsible for the preservation of the cultural resources and the ranching areas within the seashore that are now being designated as national historic dairy districts - both PRNS and GGNRA. Supporting the Lunny Ranch farm plan appears to meet all NPS objectives at PRNS – natural resource conservation, cultural resource conservation, historic resource preservation and visitor enjoyment.

Clearly, this Lunny Ranch Plan includes only high level descriptions of historic use restoration. More detail may be necessary for PRNS to prepare the Lunny Ranch 20 year, renewable permit. The Lunny family pledges to work with the team

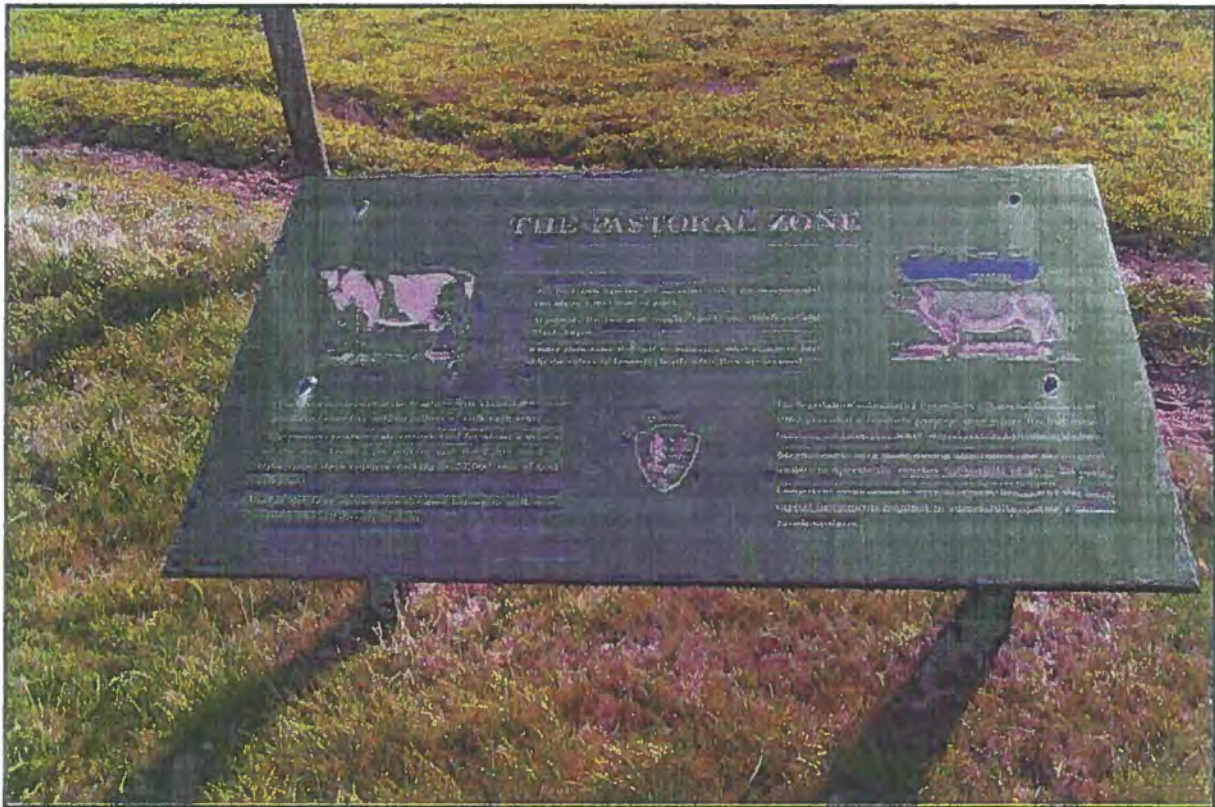
preparing this EIS as well as the team preparing the new leases to answer any questions regarding the Lunny Ranch farm plan.

Sincerely,

The Lunny Family

Ranching at Point Reyes: Two Centuries of History and Challenges



Prepared by: Ethan L. Lane
Prepared for: Point Reyes Seashore Ranchers Association
Submitted: May 2014

Endorsed by: California Cattlemen's Association Marin Farm Bureau



Ranching at Point Reyes: Two Centuries of History and Challenges

INTRODUCTION

In May 2014, the National Park Service initiated a “Ranch Comprehensive Management Plan/Environmental Assessment” (Ranch CMP) to address a variety of issues impacting the future of historic grazing and dairy operations inside Point Reyes National Seashore. Citing in part Secretary of Interior Ken Salazar’s 2012 memorandum directing the Park Service “to pursue extending permits to the ranchers within those pastoral lands up to 20-year terms,” the scoping document for the EA purports to seek management guidance on a variety of issues including articulation of a “clear vision for ranching” at PRNS, streamlining regulatory review processes, and finally, addressing tule elk impacts on existing ranching operations.

It is this last item, the rather clear-cut goal of addressing tule elk impacts, that belies the true gravity of a rapidly deteriorating situation that threatens not just two centuries of historic cattle and dairy operations at Point Reyes, but with it the larger agricultural fiber of Marin County.

The presence of tule elk at Point Reyes is the result of a series of impulsive and politically motivated management decisions beginning in the 1960s and carrying through to today. Time and again best management practices, existing leases and assurances to seashore ranchers, and even the original intent of Congress, have been ignored in the face of outside political pressure and a desire to create what can only be described as a “Disneyland” version of Point Reyes.

The pastoral landscape on display at Point Reyes National Seashore isn’t simply an anomaly on the heavily developed California coastline. It is the physical embodiment of centuries of agricultural history and culture dating all the way back to the earliest native inhabitants, who utilized controlled burns to improve grazing conditions - thus starting a tradition of responsible range management carried on to this day by the seashore ranchers at PRNS. It represents the hard work of generations of cattlemen and women to cultivate and maintain one of the most unique and productive grazing environments in the country. It is with this history of hard work in mind that one must examine the current agricultural and management conditions at Point Reyes National Seashore.

Inevitably, the result is a series of questions:

- What has been successful over the past two centuries?
- Perhaps more importantly, what hasn’t been successful? (Overgrazing, poor management of “native” plants and animals, introduction of new plants and animals without proper study)
- What was the original intent of elk introduction?
- How closely do today’s conditions mirror that intent?
- What can the range conditions at the Pierce Point Ranch and Limantour tell us about additional incursions of elk into the Pastoral Zone?
- Where have previous elk management attempts failed and who is responsible?
- Given the events to date, is the Park Service equipped to manage agricultural landscapes like Point Reyes?

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EARLY HISTORY OF POINT REYES

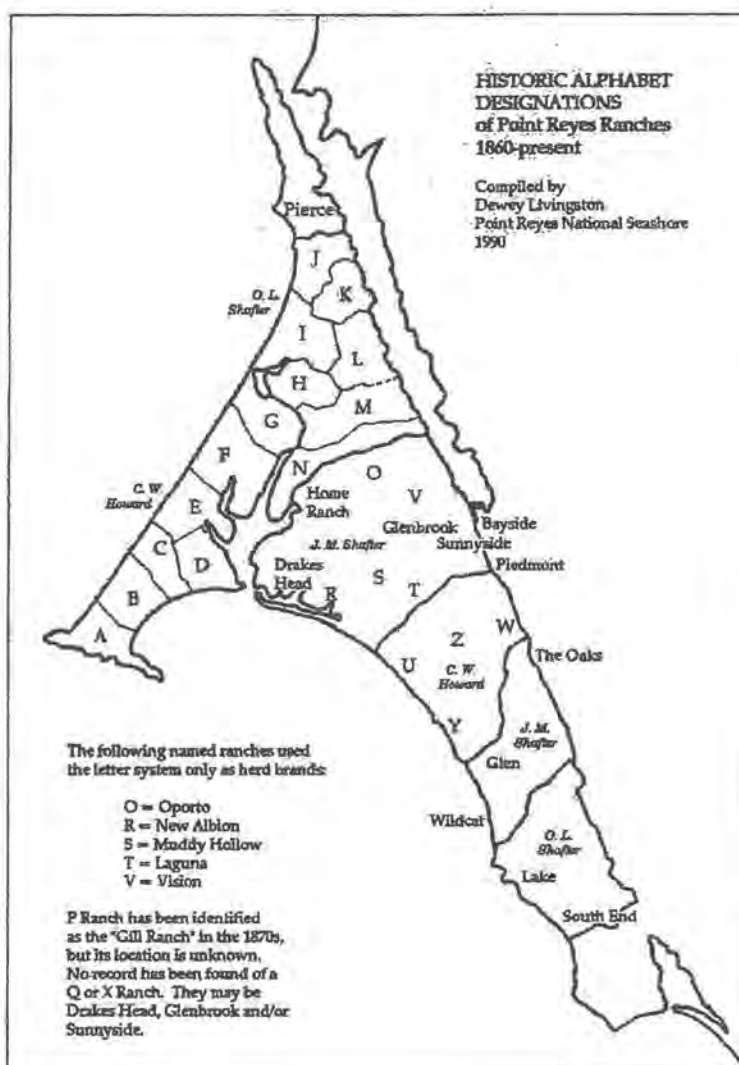
The first agricultural activity at Point Reyes came by way of the Coast Miwok Indians, who inhabited the area as early as 5000 years ago. They existed for millennia on the bountiful harvest afforded them at Point Reyes. Fish, shellfish, deer and elk, and wild growing vegetation like roots, berries, and acorns all contributed to the Miwok diet. Over the centuries, the Miwoks learned to enhance this harvest through brush control and what historians believe to have been a sort of rudimentary form of range management.

The Miwoks first contact with Europeans most likely came with Sir Francis Drake's exploration of the area in 1579. He is believed to have made landfall at modern day Drakes Estero and, according to John Hart's recent book *An Island In Time*, promptly interrupted a rite honoring the dead. By all accounts, these early interactions were peaceful, with the Miwoks existing as they had for two more centuries before all but disappearing with the founding of Spanish missions in the area around 1776 and the Miwoks' subsequent integration into mission, and later ranch life.

Early Owners, Evolution of the Alphabet Ranches, and the Beginning of Ranching at Point Reyes

The first American settlers arrived with US annexation of California via the Mexican Cession in 1848 and the Gold Rush that immediately followed. In order to keep up with demand for dairy in booming San Francisco, a prominent San Franciscan named Randall set about consolidating land on the Point Reyes Peninsula in 1852, quickly introducing hundreds of head of cattle, sheep, and goats, as well as managing thousands of feral cattle left over from the Spanish missionaries of the preceding decades. This rapid expansion proved to be Randall's undoing, as he lost the ranch to foreclosure and was shot by one of his creditors in 1856.

Curiously, the ensuing legal wrangling over the Peninsula resulted not with ownership by Randall's creditors, but rather the partners in one of their law firms - Shafter, Shafter, Park & Heydenfeldt. Over several years, the firm assembled more than 50,000 acres, including most of the Inverness Ridge, Coastal Plain, and the area known



today as the Pastoral Zone. By the late 1850s, Oscar and James Shafter, joined by son-in-law Charles Howard, began organizing the ongoing ranching and dairy operations at Point Reyes into 30 ranches that could be leased to individual operators.

Many of the existing dairy ranches signed leases with the new owners to continue operations on the Peninsula. Beyond these leases, the Shafter's also sold a large parcel at Tomales Point to Solomon Pierce, who proceeded to build a dairy operation that reportedly rivaled the Shafter's own in terms of both quality and output.

Over the next decade the new owners subdivided their holdings several times, eventual settling on 33 individual ranches divided amongst 6 larger tracts, each owned by one of the partners. Twenty-six of these individual ranches were named for letters of the alphabet, starting with "A" closest to the Point and working down the alphabet to "Z".

The ranches flourished in this configuration through the rest of the 19th Century. The advent of refrigeration, new dairy operations with better road access in other parts of the region, damage from the 1906 earthquake, overgrazing, and the spread of several non-native plant species across working grassland all contributed to a precipitous drop in profitability by the onset of the Great Depression in the late 1920s.

Following a period of turnover fueled by real estate investors and speculators beginning in 1919, ownership of the individual ranches eventually landed with the contemporary tenants-turned owners-turned tenants again by the 1930s. Many of these families, the Mendozas, Grossis, McClures, and others, continue to ranch the Point Reyes peninsula today.

This ownership shakeup was just in time for the opening of the Golden Gate Bridge in 1937 and with it the expansion of real estate development from booming San Francisco into Marin County.

As a response to that development, and also spurred by a 1935 National Park Service report assessing potential park sites on the Pacific Coast, serious efforts were underway to protect the unique pastoral landscape on the Point Reyes Peninsula by the late 1930s and following World War II. That report, *Study of a National Seashore Recreation Area, Point Reyes Peninsula, California*, advocated for a comprehensive preservation effort in the form of a 56,000 acre park, roughly along the boundaries set forth in the eventual Congressional authorization in 1962.

According to *An Island In Time*, the first conservationists at Point Reyes were the ranchers themselves, beginning with the donation of Drakes Beach by a group including Joe Mendoza in 1938 and the sale of modern day McClure's Beach to Marin County for \$1 four years later.

Next came the dedication of Tomales Bay State Park in 1952, following seven years of fundraising and arm-twisting by the Marin Conservation League, together with matching funds from the county Board of Supervisors.

Thus began a decade-long struggle to create the Point Reyes National Seashore. The original 1935 report

was updated in the form of a new survey titled *Pacific Coast Seashore Survey Preliminary Report, Point Reyes Peninsula, California, Seashore Area* in 1957. This report, commissioned by NPS Director Conrad Wirth (who, incidentally, was the author of the original 1935 report), called for a much smaller footprint at Point Reyes, focusing on Tomales Point and the southern portions of the park, but largely excluding the existing ranching operations on the peninsula. Even this limited proposal was poorly received by the locals and ranchers who feared the inevitable result, a gradual elimination of agriculture on the Point Reyes Peninsula either by legislation, outsider encroachment, or both.

CREATION OF POINT REYES NATIONAL SEASHORE

Point Reyes National Seashore was created by authorization of Congress in 1962. The legislative wrangling that preceded it at every level is a story unto itself. Following US Representative Clair Engle's 1958 resolution calling for a report on the proposed Point Reyes National Seashore Recreation Area, Clem Miller, the Congressman representing California's 1st District (at that time spanning the coast of California from San Francisco north to the Oregon border) introduced legislation in 1959 to create a national seashore at Point Reyes. Concurrently, then *Senator* Clair Engle introduced an identical companion bill in the Senate (H.R. 8358 and S. 2428, respectively). The original legislation was general in nature, proposing a seashore between 28,000 and 35,000 acres but not specifying any boundaries.

Lacking local public support for the proposal, particularly from seashore ranchers and others opposed to Federal condemnation of active grazing land, Miller and Engle put their bills on the back-burner and set about building local support through a variety of methods, including the creation of "grassroots" groups like the Point Reyes National Seashore Foundation. According to *Managing a Land in Motion: An Administrative History of Point Reyes National Seashore*, a report prepared for the NPS in 2007, Miller was quoted at the time as saying:

"It is necessary that we begin to take some steps in our office to push this matter if the local people are unable to or unwilling to do it. At the same time, I want to retain the concept of local autonomy particularly West Marin local autonomy. We want to give the impression that everything is emanating from there. I am afraid, however, that McCarthy [attorney for the ranchers] sees through this."

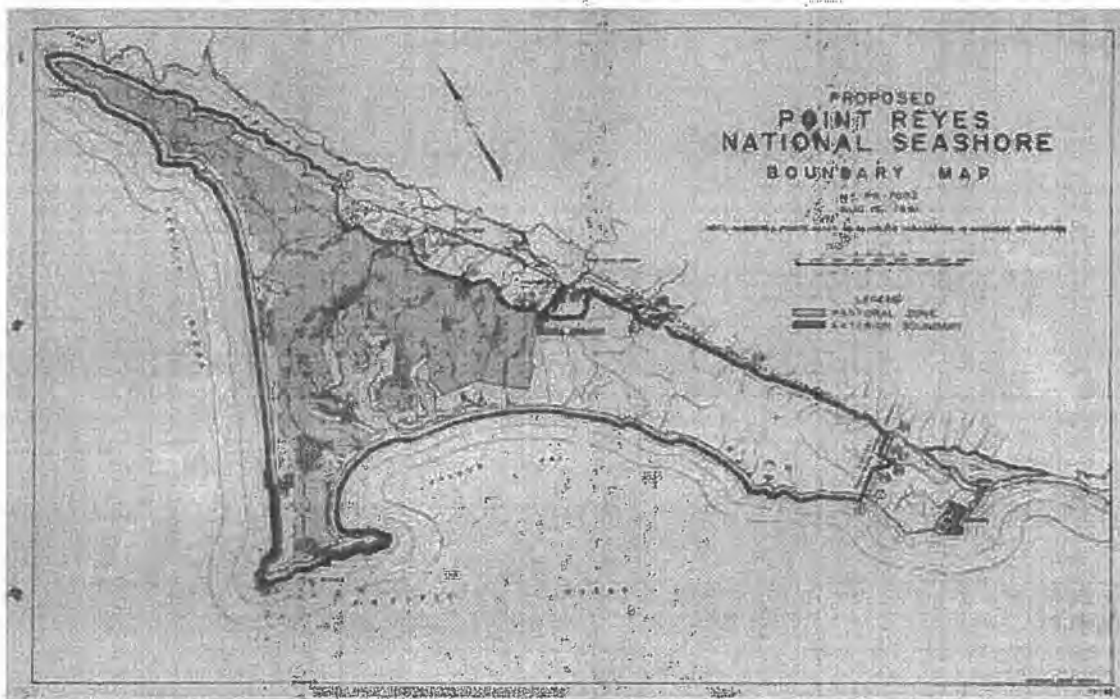
Also standing in opposition to the creation of a National Seashore at Point Reyes was the Marin County Board of Supervisors, who voiced their disapproval repeatedly through both votes and letters to Clem Miller; and the West Marin Property Owners Association. The latter was formed in 1958 by thirty-five West Marin ranchers in response to the perceived threat to their livelihoods from annexation into the proposed park.

The onset of the 87th Congress in 1961 brought revised bills from Miller in the House of Representatives and Engle, now joined by Republican Senator Kuchel, also of California. These updated but still identical bills (H.R. 2775 and S. 476) contained some important additions. The size of the proposed park had been expanded to 53,000 acres (based on the recommendations of the National Park Service), and provisions had been added to address the concerns of local land owners and ranchers.

Among these provisions was the creation of a “pastoral zone” of at least 20,000 acres which would allow continuation of historic ranching and dairy operations within the constructs of the larger park plan. This pastoral zone, along with “right of use and occupancy” language guaranteeing continued possession of seashore ranches by existing ranch families (as long as they continued their current grazing and dairy activities), and a land exchange structure allowing owners a way to exchange their property for something of equal value in elsewhere, all served to persuade local land owners and the Marin County Board of Supervisors to drop their opposition by early 1962.

This paved the way for final passage in the House and Senate in the summer of 1962, with President Kennedy signing the Point Reyes National Seashore Authorization Act on September 13, 1962. The final act authorized the Department of the Interior to spend up to \$14 million to establish Point Reyes National Seashore.

The four page authorization signed by President Kennedy - Public Law 87-657 - outlined the general boundaries of the intended seashore and pastoral areas, contained extensive language dealing with any acquisitions of property from owners wishing to sell to the Department of Interior, and specifically granted the Secretary authority to permit hunting and fishing, in keeping with the recreational intent as well as to allow ranchers to maintain their historic way of life at Point Reyes.



Map NS-PR-7002, showing the pastoral zone of Point Reyes National Seashore. (Image courtesy of NPS.)

It wasn't until 8 years later, in 1970, that the authorization for PRNS was expanded to include the seashore ranches and the original spending cap for land acquisition raised from \$14 million to \$57 million using money from the relatively new Land and Water Conservation Fund.

The intervening years between the original authorization in 1962 and the first amendment in 1970 saw an agency unsure as to just what they had created at Point Reyes. In fact, the National Park Service at this time was struggling nationwide to define their role in managing some of the newly created seashores, lakeshores, and parkways within the NPS system. *An Administrative History of Point Reyes* describes the creation of sundry committees, commissions, bureaus, and boards charged with resolving these issues and charting a path forward. Among them:

- The Outdoor Recreation Resources Review Commission (ORRRC) created by President Eisenhower in 1958. ORRRC produced a report in 1962 entitled *Outdoor Recreation in America*. In it, the ORRRC called for the creation of:
 - The Bureau of Outdoor Recreation (BOR), an offspring of the ORRRC which subsequently competed with the Park Service within the Department of Interior for control of DOI property and budget.
 - The Recreation Advisory Council, another ORRRC suggestion created by President Kennedy in 1963 that produced "Policy Circular No. 1" later that year. That document advocated greater accessibility of national recreation sites like NPS seashores for "all-purpose recreational use".
- A special committee of the NPS Advisory Board on National Parks, Monuments, and Historic Sites that was directed to address calls to "reorganize" the Park Service "to make very clear the distinction between the traditional functions of the Service and the newer and often very different ones that are primarily recreation related."

The unifying characteristic of all these initiatives is that they fell by the wayside within a decade - their conclusions and recommendations mostly forgotten by the greater public lands community. At places like Point Reyes, however, the aftereffects of this unfocused management are still being felt today.

The recommendations of the special committee of the NPS Advisory Board eventually led in 1964 to a directive breaking park unit management into three distinct categories - natural, historic, and recreational. Additionally, each new category now had its own operating guidelines ostensibly tailored to the primary objectives of the category. PRNS fell under the recreational area category in this new arrangement, with policy direction coming from the *Compilation of the Administrative Policies for the National Recreation Areas, National Seashores, National Lakeshores, National Parkways, National Scenic Riverways (Recreation Area Category) of the National Park System* - one of three manuals governing operation of the newly created categories.

Of the new categories, Secretary of Interior Stewart Udall wrote:

"In looking back at the legislative enactments that have shaped the National Park System, it is clear that the Congress has included within the growing System three different categories of areas—natural, historical, and recreational.

“Natural areas are the oldest category, reaching back to the establishment of Yellowstone National Park almost a century ago. A little later historical areas began to be authorized culminating in the broad charter for historical preservation set forth in the Historic Sites Act of 1935. In recent decades, with exploding population and diminishing open space, the urgent need for National Recreation Areas is receiving new emphasis and attention.

“...a single, broad management concept encompassing these three categories of areas within the System is inadequate either for their proper preservation or for realization of their full potential for public use as embodied in the expressions of Congressional policy. Each of these categories requires a separate management concept and a separate set of management principles coordinated to form one organic management plan for the entire System.”

The most obvious flaw in this new management plan was the issue of Congressional intent. The authorizations for many of the newly created units contained language that directly contradicted recreational priorities envisioned by the Advisory Board. In particular, the enabling legislation for Point Reyes outlines preservation, recreation, and deference to ongoing ranching activities as priorities in different parts of the law - a study in contradictions unto itself.

These contradictions were so frustrating to park staff that, according to multiple accounts, the new manuals were largely ignored by the early 1970s, aided by the General Authorities Act of 1970 which reestablished the idea of a common thread running through all units of the National Park Service, regardless of their disparate original intent. In other words, NPS quickly decided that it was easier to tailor units to fit a common theme than it was to operate unique areas like Point Reyes in a site-specific manner.

On a National level, the Park Service would revise its management policies several more times during the 1970s, each time wrestling with the question of how to manage resources that didn't fit into the traditional idea of a “national park”. This identity crisis was particularly detrimental to PRNS since it coincided with the seashore's formative years. Much of the park service's original management and master planning took place in an environment where national park management policy was changing year-to-year.

SHIFTING PRIORITIES

By 1975, Point Reyes National Seashore, benefiting from an increased Congressional authorization (from the original \$14 million in 1962 to \$57 million in 1970) had acquired all 17 of the outstanding seashore ranches and were hard at work on a general management plan for the unit (the first iteration of which was published in 1972 although the current version wasn't published until 1980). Around this same time, the recreational-area approach to management of PRNS and the subsequent heavy public use it spurred led to calls from the environmental community for better protection of the seashore's natural resources.

A multitude of environmental and conservation organizations either formed or increased their involvement during this period. These included the Sierra Club, Audubon, the Marin Conservation

League (which had been involved in the creation of the original state park that preceded PRNS), the Environmental Action Committee of West Marin, and the Save Our Seashore” campaign.

Almost immediately, these environmental groups opposed the hunting and fishing activities promised by Congress in creating PRNS. They argued that hunting in the seashore would be dangerous and detrimental to the visitor experience, despite Clem Miller’s explanation a decade earlier that “The national seashores are not national parks - a wider range of outdoor recreational activities will be permitted...”. Miller and others maintained that irrespective of this intent, the locals in greater Marin County were generally opposed to hunting at the new seashore. This opposition did not extend to the ranchers, who had incorporated hunting as a way of life for generations at Point Reyes.

Even as PRNS instituted a total ban on hunting at the behest of local environmental groups in 1971, Superintendent John Sansing indicated his intent to study the need to retain hunting as an option for control of some wildlife populations, particularly deer.

This ban represented one of the early breaches of trust between the seashore ranchers and park service management. Critical to their inducement to sell (under threat of condemnation) long-held ranches to the Department of the Interior was the promise that the ranchers would maintain the right of “use and occupancy” under their new lease agreements. Sansing acknowledged as much by granting temporary exceptions to the hunting ban in multiple cases following the decision. Regardless, the foreshadowing was unmistakable that historic ranching at Point Reyes would have to be defended at every turn if it were to survive.

A NEW DIRECTION AND NEW SPECIES

“Although the final land purchases and formal National Park Service establishment of Point Reyes National Seashore in 1972 had “completed” the park by defining its geographic boundaries, the process of redefining the function and meaning of the peninsula’s natural, cultural, and human resources continued over the next three decades of PRNS history.”

- Managing a Land in Motion: An Administrative History of Point Reyes National Seashore (Paul Sadin, Historical Research Associates, Inc. 2007)

Spurred on by the successful derailing of an ill-conceived development scheme within the seashore, left with an extensive local network of activists and organizations, and blessed with inconsistent and scattered NPS management, the environmental community in Marin County set about remaking Point Reyes National Seashore in its own image during the mid-1970s.

Contributing to this leadership vacuum, 1974 brought yet another failed management concept to Point Reyes. In an effort to more effectively deal with the competing resources and interests of the agency in the San Francisco Bay area, NPS attempted to reorganized Golden Gate National Recreation Area (GGNRA), Muir Woods, PRNS, and other areas into a single administrative unit. This arrangement proved wholly unsuccessful and was abandoned within a few years of its implementation.

It was during this period that the idea of reintroducing historically native tule elk first surfaced. As impossible as it sounds, on-going general management planning discussions simultaneously entertained both the need to control *over*populated deer and the desire to introduce the long-absent elk species into the already crowded and conflicted recreation area/seashore/historical site.

This lack of a cohesive approach to resource management led to the 1976 publication of a Natural Resources Management Plan and Environmental Assessment to deal with a variety of pressing issues inside the seashore. Among them grassland management, control of exotic plants, fire management, maintenance of exotic deer populations, control of dogs and cats, stocking of fish, dam removal, backcountry use, and reintroduction of tule elk. It is important to keep in mind that at this time, PRNS staff was still mid-way through formulation of a comprehensive general management plan (GMP) for the seashore, which would not be completed and published until 1980.

As with many aspects of the Point Reyes story, the formulation of the 1980 GMP is a story unto itself. With the onset of NEPA (the National Environmental Policy Act) in 1969, Point Reyes became an early test case of the public participation requirements built into the new law. Environmental groups, emboldened by their recent successes, took the opportunity to submit their own complete general management plans, rather than simply contributing or commenting on the park service's efforts.

One of their chief objectives was the establishment of a "wilderness" designation (as defined in the 1964 Wilderness Act) over the majority of land inside PRNS. This push resulted in Public Law 94-544 in 1976 designating some 25,000 acres of PRNS as wilderness and an additional 8,000 as "potential" wilderness - and helping to cast the organization of PRNS as it exists to this day. It should be noted that this wilderness was pushed through *prior* to the completion of the 1980 General Management Plan, effectively circumventing the new public participation requirements of NEPA. Instead, the wilderness was simply part of PRNS by the time the GMP was published four years later.

TULE ELK INTRODUCTION

The establishment of the Phillip Burton Wilderness Area, as it was named in 1984, paved the way for one of the key items on the environmentalists agenda at Point Reyes to come to fruition - the reintroduction of tule elk.

One of the last ranch acquisitions completed at PRNS was the Pierce Point Ranch on Tomales Point in 1973. In the eyes of the Park Service and wilderness advocates, Tomales Point, with its expansive vistas and commanding views of the Pacific featured prominently in the new proposed wilderness area. The fact that it was being actively grazed as part of the Congressionally established Pastoral Zone was of little concern, and following its purchase, PRNS immediately embarked on the eviction of the resident rancher, Merv McDonald, who's family had been ranching at Point Reyes since the 1880s and at Pierce Point since 1966.

Evidence of this intent comes in the form of a 1974 letter addressed to Superintendent Sansing from the California Department of Fish and Game. The letter discusses a previously executed Memorandum of Understanding between NPS and CDFG regarding the elk, and goes on to discuss the specifics of erecting

a fence across Tomales Point to create a proper enclosure to "prevent them from spreading to adjoining areas where they could cause depredation problems." It should be noted that this letter, as well as the MOU that it references, come a full two years before the 1976 congressional directive to use federal lands to protect tule elk in California.

STATE OF CALIFORNIA—RESOURCES AGENCY
 DEPARTMENT OF FISH AND GAME
 1418 NINTH STREET
 SACRAMENTO, CALIFORNIA 95814
 G. Ray Arnett, Director

October 22, 1974

Mr. John Sansing
 Point Reyes National Seashore
 Inverness, California 94937

I have been informed, John---

---that plans are moving ahead for the transplant of Tule elk to Point Reyes National Seashore.

I wish to reaffirm the desirability of the Department to cooperate in such a transplant as evidenced by our Memorandum of Understanding executed on April 27, 1974. I also wish to reaffirm that the Department of Fish and Game feels the fence called for in this Memorandum of Understanding is necessary to keep the elk on the northern part of Tomales Point and to prevent them from spreading to adjoining areas where they could cause depredation problems. When the fence is completed, we plan to provide Tule elk from Tupman and other available sources of the pure Tule elk race.

Sincerely,


 Director

cc: National Park Service

In the five years following the purchase of the Pierce Point Ranch the Park Service made ranching operations at Pierce Point increasingly difficult for McDonald, their efforts made much easier with the inclusion of Pierce Point Ranch and all of Tomales Point in the 1975 wilderness designation. Clearing that legislative hurdle allowed PRNS to restrict the use of motorized vehicles, terminate electrical service to essential water pumps, prevent routine road grading, and hamper essential fence repair. The McDonald family fought the eviction until 1978, operating under a series of two year special use permits while attempting to work with the Park Service to find a suitable and affordable place to relocate outside the seashore. Amazingly, that search took the McDonalds as far away as Australia, to no avail.

The family was permanently evicted in 1979, but not before suffering the final indignity of watching the new tenants of Pierce Point, 10 tule elk from an existing herd on the San Luis National Wildlife Refuge in Southern California, released into a temporary enclosure on the ranch. In fact, Merv McDonald states that he was asked to help care for the new arrivals in his last months there and recalls one particular female that was sick with diarrhea (a telltale symptom of Johne's Disease) that subsequently died in the enclosure, one of several to die from illness in the years immediately following introduction.

HISTORY OF TULE ELK IN CALIFORNIA

In 1998, the NPS completed an Environmental Assessment (EA) of elk management activities at PRNS (which will be discussed later in this report) following the guidelines of the National Environmental Policy Act (NEPA). That EA describes Tule Elk thusly:

Tule elk females, or cows, give birth in the late spring and early summer from April through June usually to a single calf, and rarely twins. Weighing around 30 pounds at birth, the newborn calf was conceived some eight months earlier during the last summer's rutting season. The ratio of male to female calves at birth is 50:50, but this changes over their adult life, usually with females living longer than males.

Tule elk young grow rapidly, reach sexual maturity at 18 months of age, and eventually grow to some 300-500 pounds, with males being 50-100 pounds heavier on average than females.

Males at 1.5 years of age develop short (about one foot), straight antlers and are known as "spike bulls." As they age, the antlers rapidly become larger with four or five points that may weight up to 40 pounds. The antlers begin growing in the late winter shortly after being cast off. Covered with tissue or "velvet" during the growth period, the velvet covering dries out and is shed to reveal the completed antler. This nutritionally demanding annual accomplishment compounds the biological cost of reproduction for the male.

Tule elk breed in a polygamous mating system where males compete during the rut or breeding season for dominance. The result is that the dominant bull mates with many females, accomplished through forming harems. Thus, only 15-25% of males breed compared with 90% of females. At Point Reyes the rutting season is usually in the late summer in July through September. Bulls establish a dominance hierarchy through rutting behavior that includes vocalizations such as "bugling," various body postures and threats, and the dramatic fights that can result from head butting and antler charging. While most of these behaviors result in no harm to competing males, injuries can sometimes occur. Most dominant bulls are in the range of 4-8 years old, but this

varies' a great deal depending upon the age structure of the herd. The dominant bulls herd and defend females, which form a reproductive herd or "harem." The lead bull will go a month with little food to keep out competitors and breed with the females when they enter reproductive readiness or "estrus."

Tule elk are considered mixed grazers and browsers, meaning they feed on both ground-level herbs and grasses and on woody shrubs and trees. At Point Reyes elk eat a wide variety of plants including various grasses, coyote bush, willow, bush lupine, plantain, and miner's lettuce. As ruminants, their multi-chambered stomach is ideal for breaking down plant cellulose through bacterial action. Each animal consumes some 2 to 3 pounds of vegetation per 100 pounds body weight each day depending on nutritional content of the food. Thus, a 450-pound bull might eat 10 to 15 pounds of forage daily. Tule elk require 3-10 acres of habitat per animal, but this figure is very inexact due to the differences in productivity of different soils, climates, vegetation, communities, and numerous other factors.

Tule elk have few remaining predators at Point Reyes at this time. Originally black and grizzly bears, mountain lions, and coyotes would have taken their toll, especially on the newborn and young, along with the older infirm animals. Today, coyotes occur on the Tomales Point elk range and mountain lions have occasionally been spotted a few miles away. Should tule elk be allowed to expand their range in the Seashore, they will likely come into regular contact with these predators.

Life expectancy for tule elk is generally considered to be 8-12 years once they reach adulthood, but individuals can live much older than this. In 1998 one of the original animals, introduced in 1978, mown locally as "old cow," died at an age of at least 21 years.

Once abundant in California, tule elk populations dwindled in the 1800s, dropping from 500,000 head in 1850 to a low-point of around 30 animals by 1874, primarily due to over-hunting and conversion of habitat to agricultural land. Decades of effort to restore the population resulted in a herd numbering several hundred by the 1940s.

In the 1970s, both the State of California (1971) and the Federal government (1976) passed legislation dealing with tule elk recovery. Both set 2000 animals as a sustainable state-wide population goal. The Congressional resolution went so far as to direct Federal agencies to make land available for species preservation. In the wake of these two bills an interagency task force was established to determine the best place to establish new herds in California. The task force was made up of representatives from the National Park Service, BLM, Department of Defense, California Fish and Game as well as Parks and Recreation, and the US Forest Service.

Beyond Point Reyes, the findings of that task force led to the establishment of herds on military reservations, federal, and state lands around California. That action led to a 1986 tule elk population in California numbering more than 2000 individuals in 22 herds throughout the state, thus achieving the goal originally put in place by the task force.

It should be pointed out that, despite the tremendous management instability and shifting priorities at PRNS during the 1970s, an Operations Evaluation in 1972 labeled tule elk reintroduction as a "pressing issue." This is astonishing considering the circumstances, and speaks to the larger historical management

issues at PRNS, particularly with regard to prioritization and best management practices.

GROWTH AND EXPANSION OF THE POINT REYES HERD

Following the eviction of the McDonald family and the introduction of 10 tule elk to Tomales Point in 1979, a permanent enclosure was erected in the form of a 3-mile long fence between Tomales Bay and the Pacific Ocean creating a 2600 acre area for the elk to roam without interfering with ongoing ranching operations.

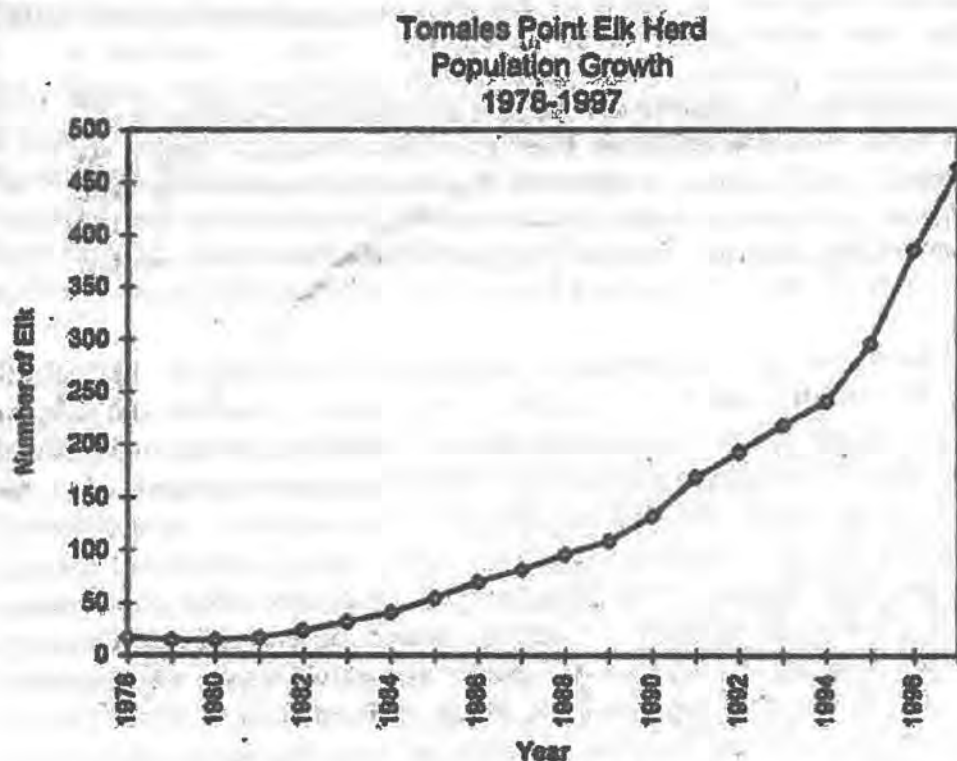


Figure 2. Growth of Tomales Point Elk Herd from 1978 to 1997

The optimal carrying capacity for the Tomales Point enclosure was identified in a 1986 study by Pete Gogan at UC Berkley as 140 animals. This number and Gogan's study are referenced in the historical portion of the 1998 Elk Management Plan as well. In his study, Gogan estimated that "once the elk reached that level, the population would naturally stabilize."

In reality, the opposite occurred. After struggling for the first several years in the enclosure, primarily due to persistent drought conditions and disease issues, elk numbers exploded through the 1980s and 1990s. A 1994 elk census counted 254 individuals at Tomales Point, and another in 1996 pegged the population at 380 individuals - 240 more than the estimated carrying capacity of 140 outlined in 1986 and 30 more than a subsequent study conducted by a panel of scientists in the early 1990s that concluded there was enough feed at Tomales Point to carry 350 individuals. Regardless of the estimate used, it is clear that by the mid-1990s the elk herd at Point Reyes had outgrown its 2600 acre enclosure and was not

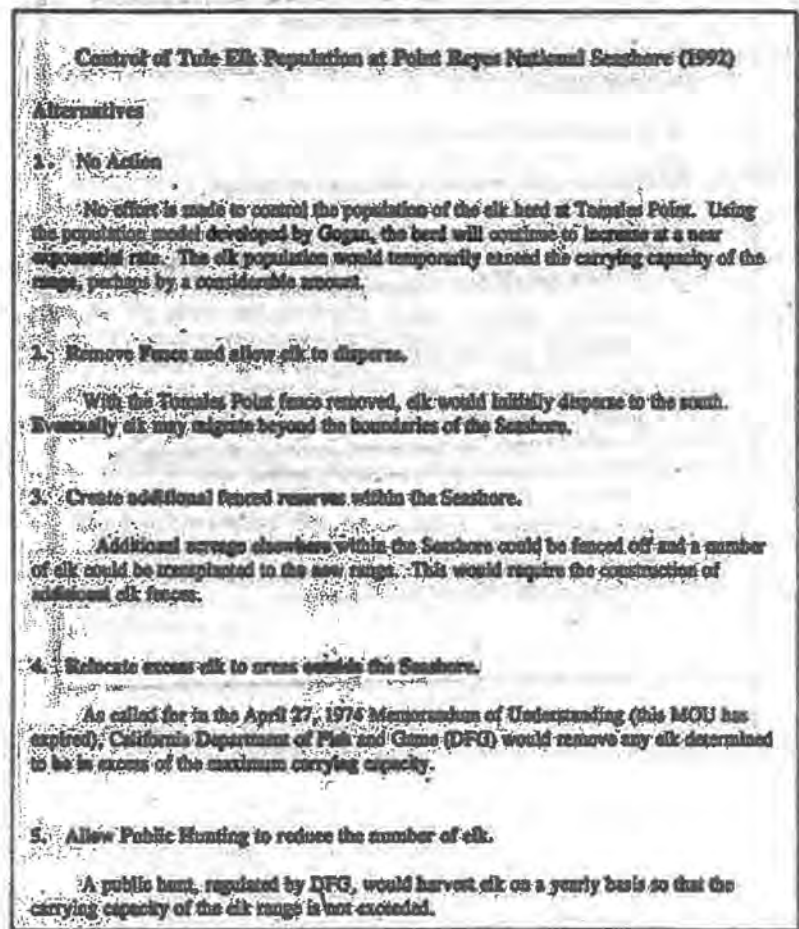
stabilizing as predicted.

The first attempt at a public process to deal with the growing elk issue was a 1992 Environmental Assessment titled *Control of Tule Elk Population at Point Reyes National Seashore*. This EA identified five alternatives including removal of the Tomales Point fence, creation of additional fenced areas, relocation outside the seashore, and managed hunting of excess population.

Despite the pressing need to deal with the issue at that time, the 1992 EA was "withdrawn from the approval process" by NPS. Interestingly, and foreshadowing the Park Service's disregard for NEPA compliance on future issues, Appendix B of the 1998 Elk Management Plan states that despite the abandonment of the process in 1992, PRNS used the draft assessment and public response to help formulate policy and direct strategies for tule elk at Point Reyes.

In May of 1997 PRNS explored numerous options for controlling the surging elk population at the seashore. Among them, immuno-contraception, chemical sterilization, relocating "surplus" elk to other wilderness areas in the seashore, and the culling of excess population through hunting by park rangers. These discussions, along with a "bumper crop" of 100 calves the previous summer, led to PRNS undertaking a new Environmental Assessment to formulate an Elk Management Plan, which was published in 1998.

The 1998 Elk Management Plan weighed a variety of options for dealing with the exploding elk population at Point Reyes. Conceding a current population of 465 individuals at the time of the report, already far in excess of even the most generous estimations of carry capacity at Tomales Point, the EA identified only four alternatives this time. Conspicuously absent was the public hunting alternative present in the 1992 report. No explanation was given as to why this option, which is used in various forms throughout the National Park Service and was included only six years prior, was not deemed worthy of inclusion in the 1998 EA. Given the history of administrative decision-making at PRNS, the logical conclusion is that political pressure once again took precedence over sound science and best management practices. Regardless, the new more politically palatable Environmental Assessment was



published with a Finding of No Significant Impact (FONSI) in July of 1998, meaning that PRNS was now free to pursue Alternative A, "Manage Elk using Relocations and Scientific Techniques".

The specifics of implementing Alternative A are outlined in the report itself, including a summary of proposed actions, broken into Interim/Short-term and Long-term action categories.

Interim or short-term actions:

1. Maintain elk fence on Tomales Point Range.
2. Continue monitoring tule elk and their environment.
3. Continue PZP immunocontraception tests on elk.
4. Continue research efforts into tule elk ecology, including methods to alter elk population size where necessary.
5. Set interim management limit for Point Reyes tule elk population at 600-800 animals, with Tomales Point set at 350-450 and Limantour set at 250-350.
6. Establish thresholds for tule elk, vegetation, and other resource indicators to replace interim management limits.
7. Conduct a Risk Assessment Analysis to address Johne's Disease transmission.
8. Establish a free-ranging herd within 18,000 acres by relocating 35-70 animals to the Limantour area. Work to ensure only Johne's free animals are relocated.
9. Work to ensure public safety; reduce consequences to neighbors of free-ranging elk.
10. Work with other agencies to relocate 35-70 animals elsewhere in the State in the historic tule elk range in cooperation with the State of California.

Long-term actions:

1. Manage free-ranging herds using minimal intrusion to achieve viable management limits as part of dynamic ecosystem processes.
2. Adaptively manage the herd, revising this plan as necessary to best fit new situation and information.

Alternatives and Proposed Action

Alternative A



Alternatives including the Proposed Action

Overview of Alternatives

Four alternatives describe a range of reasonable approaches to the management of tule elk at Point Reyes National Seashore:

Alternative A: (Proposed Action) Manage Elk using Relocations and Scientific Techniques

Alternative B: Eliminate Restricted Range through Management Decisions

Alternative C: Reduce and Maintain Elk at Small Remnant Population Size

Alternative D: No Action / Minimum Requirements

The alternatives address the mission and goals established in this plan for tule elk at Point Reyes, the topics identified under the section Issues and Concerns, and the other Seashore management plans such as the General Management Plan, the Statement for Management, and the Resource Management Plan. The alternatives vary in the number and size of elk herds projected, the amount of effort required in their management, and the number of years required to achieve their goals. Some alternatives meet some of the goals better than other alternatives, and such alignments will be discussed where applicable.

Alternatives B and D propose to manage elk populations sizes with minimal intrusion within certain constraints. Alternative C places the tightest restraints on the upper limit of elk population size with a concurrent need to eliminate antlers and/or reduce fertility. Alternatives A and B emphasize relocating elk to establish free-ranging herds. Alternatives C and D represent the lowest cost approaches over a long-time period. While Alternative B may be low cost initially, future costs appear higher with this approach. Alternative C will be initially costly, but then costs will be lower. Alternatives A and C pose the least threat to other Seashore operations such as visitation or ranching. Alternatives B and D offer the highest level of potential impacts on these other resources. Alternatives A and B contribute the most towards managing tule elk as part of a natural ecosystem dynamic.

Alternatives may use a variety of methods to reduce elk populations when necessary, including contraception, sterilization, relocation, and lethal removal. The justification and decision process for making such reductions vary significantly between the alternatives.

Absent from either this list or the FONSI is any mention of managing threats to ongoing ranching operations - a topic addressed repeatedly in other parts of the report. Specifically in a matrix of environmental consequences for Alternative A that lists Cultural Resources and Ranching as potentially affected resources. The matrix cites concerns that large elk herds would "constitute visual intrusion on cultural landscape as they would not have been present during ranching period" as well as the enhanced risk that "free ranging herds may expand into territory adjacent to agricultural lands and possibly come into conflict with cattle."

No explanation is provided as to why PRNS chose not to provide mitigation options to deal with these specific impacts, although the broader prescription for the management of herd, including capture, relocation, and culling if necessary, should all logically apply to the seashore ranches in the same manner as other impacted resources.

IMPLEMENTATION OF THE ELK MANAGEMENT PLAN

Almost immediately following the publication of the Elk Management Plan and FONSI in July of 1998, PRNS staff moved to relocate some of the overflowing elk population at Tomales Point (estimated to be 550 individuals by that summer) to the Limantour area as prescribed in the EA. Over the course of the next year, 27 elk were relocated by helicopter to a temporary enclosure in the Limantour area and, in June of 1999, released from the enclosure into the Phillip Burton Wilderness.

Also of note during the summer of 1999 was the termination of ranching operations at the "D" Ranch following the untimely death of the matriarch of the Horick family, who's heirs were denied the right to continue leasing the ranch by PRNS. As in many other irregular management

Alternative A: Matrix of Environmental Consequences continued....

	Positive Consequences	Negative Consequences
Recreational Resources	There should be very little effect on recreational resources. Increased distribution of elk herds in Seashore will increase viewing opportunities for visitors. Interpretation will provide educational and enjoyment possibilities. Additional elk distribution will disperse visitors.	Possible closure of areas on temporary basis for a few days to address operations may inconvenience some recreationalists, but is more likely in this alternative than others.
Public Safety	There should be little effect on public safety under the proposed action. Avoidance of need to lethally remove animals should reduce need for addressing the public safety issues involved.	Free-ranging elk may have potential for wandering onto roads and pose traffic hazard. Expanded distribution may increase visitor contact with elk during rutting season, a time of increased safety risk due to aggressive male behavior.
Cultural Resources	Elk will assist with maintaining open grassland landscape similar to that achieved through cattle ranching. No effect expected on historic structures. Will recreate prehistoric landscape element.	Some limited erosion of archeological sites may occur. Large herds of elk will constitute visual intrusion on cultural landscape as they would not have been present during ranching period.
Adjacent Landowners	Action should have little effect on adjacent landowners or land planning in area. Improved restoration should encourage additional visitors with positive effect on local economies.	Permitting free-ranging elk may generate dispersal of individual elk out of the Seashore boundaries onto private lands. Potential if this occurs for damage to private property to occur.
Ranching	Creation of new herds will remove pressure to expand Tomales Point elk range. Alternative compatible with ranching activities encourages continued support of permits and leases.	Free-ranging herds may expand into territory adjacent to agricultural lands and possibly come into conflict with cattle. Some use of cultivated crops may occur and cattle may affect health of elk herd through cattle borne diseases.
Non-native Deer	Native herbivores can replace non-native fawn and doe deer accelerating trend for restoration of ecosystem.	Conflicts between elk and non-native deer may increase need to reduce, remove, or eliminate non-native deer, increasing costs.

situations at Point Reyes, no explanation was given as to why the Park Service refused to allow the heirs to continue the terms of the existing lease or sign a new one. Like Merv McDonald two decades earlier, the Horicks were evicted from the “D” Ranch and the ranch was “decommissioned” despite its location squarely in the middle of the Pastoral Zone.

It is around this same time that contemporaneous accounts describe the appearance of a rogue bull on several occasions at the “L” Ranch. Seashore ranchers say that PRNS removed the bull twice before finally electing to shoot the animal once it became apparent that it would continue to travel outside the designated elk habitat of the Phillip Burton Wilderness. This action is consistent with other accounts of PRNS officials complying with their own management plan during this time, at times relocating herds of up to 40 individuals at a time and utilizing fertility control methods to control herd size.

THE ELK LEARN TO SWIM

In the Summer of 2000, seashore ranchers observed two cow elk near Drakes Beach in the Pastoral Zone. This was a highly unusual development considering the geographic location of Drakes Beach relative to the designated elk range in the Limantour area. Put simply, the two areas are separated geographically by the relatively wide waters of Drakes Estero. By that Fall two more appeared, this time a bull and a cow, and this time each was wearing a GPS tracking collar. The Park Service contends that the elk must have “travelled across Drakes Estero” which in more practical terms means that they swam.

It must be mentioned here that seashore ranchers insist that none of them have ever seen elk swim, and certainly not across the fairly wide expanse of Drakes Estero. Further, one of the ranchers recalls seeing



an unmarked truck and stock trailer operating after sundown near Drakes Beach immediately prior to the appearance of the second, collared pair in the Fall of 2000.

The Park Service has no explanation for this, adhering instead to the idea that on multiple occasions elk from the Phillip Burton Wilderness Area swam across Drakes Estero to graze on the recently “decommissioned” “D” Ranch.

However the elk made the journey from their designated range into the Pastoral Zone, the Park Service chose not to adhere to the recently completed Elk Management Plan or deal with the incursion in any way. Instead, the elk were allowed to remain on the “D” Ranch to graze, multiply, and establish a third herd at Point Reyes, in direct conflict with the two year old management plan that clearly stated on page 46 under the heading “Relocation to Limantour” that “The Seashore will not attempt to establish new

herds that require permanently fenced, restricted ranges.”

According to Paul Sadin’s *An Administrative History of Point Reyes National Seashore*, “By 2001, a herd of thirty elk, including six calves born that spring roamed freely, closely monitored by park staff by means of radio transmitter collars attached to each animal.

TULE ELK AT POINT REYES TODAY

The current tule elk herd at PRNS exists in three areas of the Seashore. The largest herd resides within the boundaries of the original Pierce Point Ranch at Tomales Point. This herd was in excess of 500 animals just a few years ago, but there are reports that 100 or more have died in the past 1-2 years, ostensibly from Wastings Disease, although a simple visual examination of the range conditions at



Tomales Point highlights the inadequate volume of feed available to support the herd at its present size. Despite pronouncements in the 1998 Elk Management Plan and elsewhere that grasslands have actually improved with the decades of elk grazing, the conditions inside the 2600 acre area today stand in stark contrast. The picture at left was taken in March of 2014 and highlights the dramatic difference in available feed and scrub brush along the 3 mile fence separating Tomales Point from the Pastoral Zone.

The second herd, established through transplant of 28 animals from Tomales Point to Limintour, numbers around 70 animals. Experiencing a degradation of conditions and a lack of feed similar to the Tomales Point herd, the Limantour group makes daily incursions onto the Home Ranch, where dozens of elk, including a band of bachelor bulls, can be found routinely grazing on grassland leased for cattle grazing. The pictures below were taken during a tour of the Home Ranch in March of 2014.





Again, it is hard to ignore the striking difference in available feed between the managed grazing land and the designated elk habitat in the Phillip Burton Wilderness Area - beginning just beyond the fence line in the pictures shown here.

These daily incursions are more than a simple nuisance for affected seashore ranchers. Adult tule elk, as described earlier in this report, can consume “10 to 15 pounds of forage daily” and “require 3-10 acres of

habitat per animal.” Dozens of elk consuming feed at that rate can severely impact grazing conditions and pasture rotation schedules.

In addition to the challenges at the Home Ranch it is perhaps the unsanctioned herd residing on the former “D” Ranch that is the source of greatest consternation to the agricultural community at Point Reyes and in Marin County. Now in excess of 80 animals, Park staff has essentially appropriated the “D” Ranch for their care, feeding, and watering, going so far as to drain wetlands adjacent to Drakes Beach to create stock water tanks exclusively for their use.

The lessees of the adjacent “C” Ranch have suffered tremendous loss of grassland and damage to pastures and fencing due to the unsanctioned elk that PRNS allows to remain in the Pastoral Zone.

The below pictures, taken in the Spring of 2014, partially convey the impact on their operations and explain the threat to their continued organic certification. Once again, the condition of the grassland in the grazed areas as compared to those left unmanaged speak volumes about the importance of continued beef and dairy operations at the seashore.





The fence lines shown here divide pastures on the “C” Ranch from the neighboring “D” Ranch. In an effort to placate the ranchers, PRNS staff have begun “hazing” the elk back onto their makeshift range on the “D” Ranch whenever complaints are received. The result of that “hazing,” an absurd management strategy on its own, can be seen in the pictures of trampled fence lines and wide game trails traversing the Spalettas' pastures.

In all, 11 leased, working ranches at the seashore are currently impacted by free ranging tule elk either from the Limantour or the "D" Ranch - including the A, B, C, D, E, H, M, N, and Home ranches. These impacted ranchers have found it virtually impossible to responsibly manage and maintain their pastures in the face of routine incursions from dozens of wayward elk. Further, there is a direct financial impact as well. The more grass eaten by the elk, the more supplemental feed must be purchased and fed to maintain a productive dairy or ensure adequate weight gain in beef cattle. Over the past year, seashore ranchers have paid an average of \$270 per ton of conventional hay and \$390 per ton for organic hay - essential to maintaining organic certification.

Ironically, the elk herd's consumption of leased pasture grass also puts the ranchers at risk of violating (through no fault of their own) the PRNS grazing standard of 1200lbs of residual dry matter left on pastures prior to the rainy season.

CONCLUSION AND RECOMMENDATIONS

Put simply, the situation at Point Reyes has become critical. Inconsistent management policies, indecision as to the purpose of the unit, and an unwillingness to deploy best management practices in the face of outside political pressure have all led to a climate that could mean the end of two centuries of historic ranching activity at PRNS.

Corrective action must be taken immediately to ensure preservation of the very cultural and historical resources that Congress intended when they created the Seashore in 1962. To that end, the following actions should be taken immediately, and further should require no administrative action on behalf of PRNS other than basic adherence to existing policy and precedent.

- 1) Remove all elk from the Pastoral Zone and return them to their designated range in the Phillip Burton Wilderness Area as prescribed in the existing 1998 Elk Management Plan.
- 2) Bolster fence lines separating the Wilderness from existing historic ranches to more effectively contain the elk and prevent future incursions.

Responsibly manage herds in the Tomales Point and Limantour Wilderness Areas to ensure that the elk do not attempt to leave in search of feed. Responsible management should include methods routinely used throughout the National Park System for controlling game populations, including culling. An examination of methods at other parks reveals the following:

- At Sleeping Bear Dunes National Lakeshore, NPS uses deer hunting (no bag limit, total of 3551 deer harvested between 1984-2011)

"In 1926 four male and five female deer were introduced to the island with the hope that they would multiply to a number large enough for hunting. Since then the deer population has grown significantly due to lack of predation and artificial winter feeding supported for many years by the previous island owners. By 1981 there were an estimated 2,000 deer on the island. The island vegetation could not sustain such a large herd, so many deer starved. The surviving deer over browsed the island, eating all of the Yew and young Maple trees. Through reduction of the deer herd by hunting, the vegetation has recovered to some extent. Hunts (by permit only) have occurred annually since 1985." (Source:

<http://www.nps.gov/slbe/planyourvisit/nmihunting.htm>)

- At Rock Creek Park, Washington, D.C. – NPS uses deer hunting, fencing, and vegetation restoration

"On May 1, 2012, the National Park Service approved the Record of Decision for the Rock Creek Park Final White-tailed Deer Management Plan/Final Environmental Impact Statement (FEIS)... The Record of Decision formally adopts Alternative D, the preferred alternative contained in the FEIS. Under this alternative, the NPS will continue current park deer management actions, including monitoring the deer population, protecting certain native plants and ornamental landscaping with fencing, and continuing educational activities to inform the public about deer ecology and park resource issues. The park also will use a combination of certain additional lethal and non-lethal actions to reduce the deer population. Since 1991, data gathered from the park's vegetation monitoring program clearly show that nearly all tree and shrub seedlings are being browsed by deer before they have a chance to grow. Protecting the park's native vegetation is a key objective of the FEIS...A variety of conservation tools are being used in plan implementation including fencing, vegetation restoration, and culling. Culling is the primary conservation tool that is being used for lethal reduction of the herd. In future years, the park, using adaptive management principles, could reevaluate opportunities to use elk redistribution, wolves, or fertility control as additional tools." (Source: <http://www.nps.gov/rocr/naturescience/animals.htm>)

- At Rocky Mountain National Park, Colorado – NPS uses elk hunting, fencing, vegetation restoration, and redistribution

"The EVMP [Elk and Vegetation Management Plan] calls for maintaining an elk population of 600 to 800 animals on the winter range within Rocky Mountain National Park. To achieve this objective, culling is the primary conservation tool that is being used for lethal reduction of the herd in the park. No elk were culled during the winter of 2011-2012 and a total of 130 female elk and 1 antlerless male elk were removed from the population during winters 2008-2009, 2009-2010, and 2010-2011 (33, 48 and 50 elk removed, respectively). A total of 52 of these elk were removed as part of park culling operations and 79 were removed in support of chronic wasting disease (CWD) and fertility control research." (Source: http://www.nps.gov/romo/parkmgmt/elkveg_fact_sheet.htm)

- At Grand Teton National Park, Wyoming – NPS uses elk hunting

"In 1950 when Congress expanded the boundaries of Grand Teton National Park, they included a provision to manage the elk population through an annual elk reduction program. Elk management is complex. The 2007 Bison and Elk Management Plan calls for 5,000 elk to winter on the National Elk and a summer herd segment in Grand Teton National Park of 1,600. The Wyoming Game & Fish Department has set a target objective of 11,000 elk for the Jackson herd that includes the park herd segment. Hunters with a valid Wyoming elk hunting license and a park permit harvest elk during the annual elk reduction program." (Source: <http://www.nps.gov/grte/planyourvisit/elkhunt.htm>)

- Gettysburg National Military Park, Pennsylvania – NPS uses deer hunting

"Pennsylvania is the home of eastern White-tailed Deer, a species that has flourished in the Commonwealth over the past 80 years. Hunted in state game lands and on private property outside of park boundaries, deer instinctively made the battlefield a permanent home, which resulted in extensive damage to the natural environment as well as crops and pastureland. The National Park Service has undertaken an extensive deer control program which has reduced the population of white-tailed deer within the park boundary

over the past ten years. Though the population of deer has been reduced in the park, there are still many of these hearty animals that can still be observed, usually around dusk when they come out to graze in meadows and tall grass." (Source: <http://www.nps.gov/gett/naturescience/mammals.htm>)

Should the National Park Service and the staff at Point Reyes National Seashore fail to comply with these already accepted and administratively permitted practices, it will only serve to strengthen the case that they are incapable of managing the agricultural resources at the Seashore. In that event, the logical conclusion is that a third party must be involved to ensure proper preservation and administration of the Pastoral Zone.

Examples of this type of arrangement exist throughout the National Park System, the closest residing just down the road in the Golden Gate National Recreation Area (GGNRA). In 1996, daily management and preservation of the natural, cultural, scenic, and recreational resources of the Presidio were given to a congressionally authorized entity called the Presidio Trust, an arrangement which ensures that the unique features there are overseen by competent staff well versed in their maintenance and care, while freeing the Park Service to oversee the rest of the park unit, which falls into a more appropriate NPS management structure.

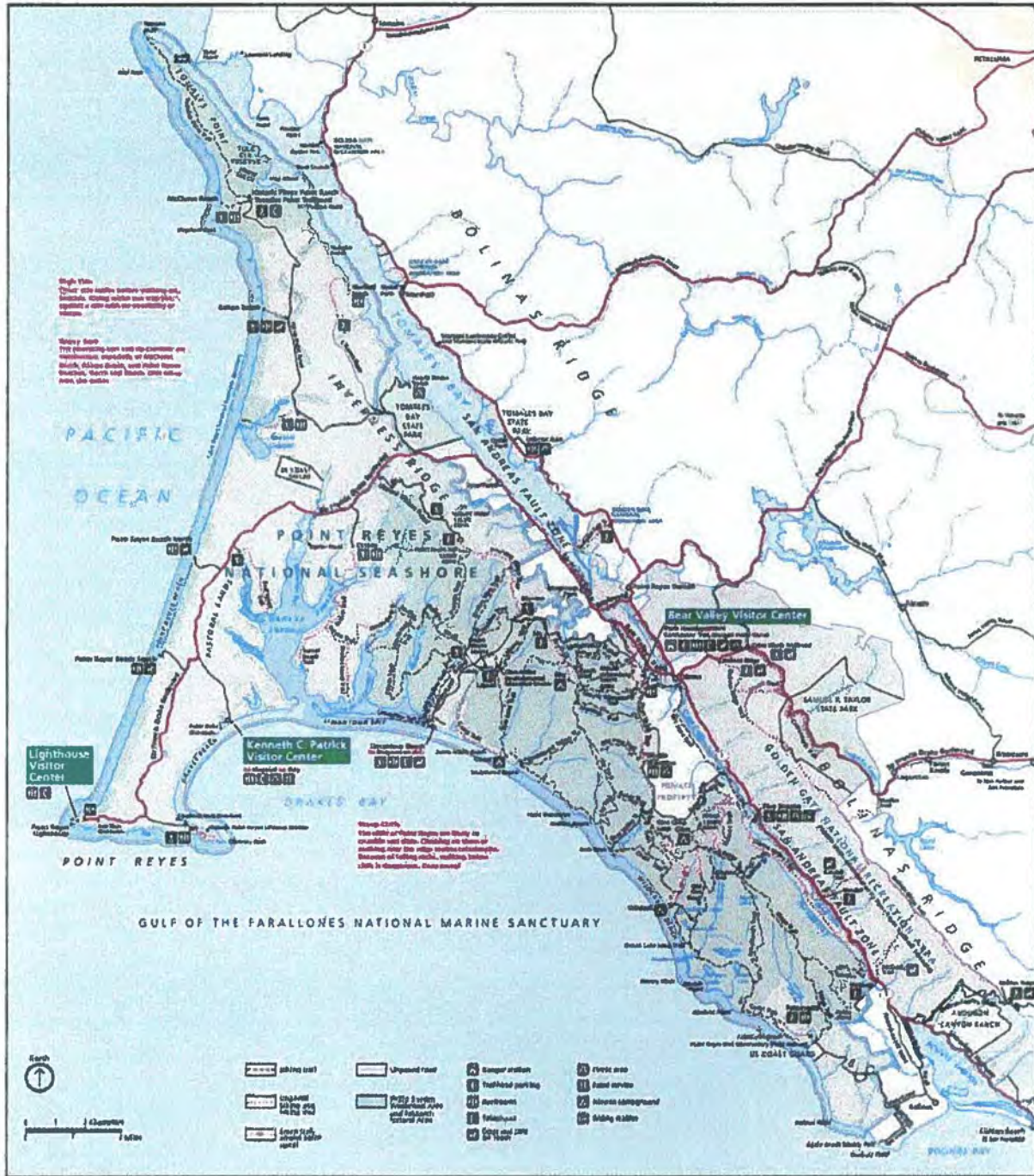
Regardless of the path chosen at Point Reyes, failure to act swiftly could lead to the loss of this precious historic resource, and with it, perhaps the eventual loss of agriculture in Marin County at large.

* * * * *

Acknowledgments

This report would not have been possible without the efforts of countless individuals who have worked on this issue over the years. First and foremost, the ranchers of the Point Reyes Seashore Ranchers Association, who were exceedingly generous with their time, input, and perspective. Additionally, Laura Watt, who's comprehensive research and encyclopedic timeline proved invaluable in squaring differing versions of events throughout the history of PRNS. Thanks also to Stephanie Larson, Ph.D for her tireless work on behalf of the PRSRA, Melissa Cichantek for her constant support, and Phyllis Faber for serving as an ever present source of inspiration and perspective on the importance of agriculture in Marin County.

CURRENT MAP OF POINT REYES NATIONAL SEASHORE



Lunny Ranch NRCS Project, Water Development Section

The Lunny Ranch, as many other Seashore ranches, suffers from deficient water quality, quantity and distribution. NRCS, a federal agency, conducted a NEPA analysis and approved a project for the Lunny Ranch that will provide the necessary water quality, quantity and distribution while improving natural resource conservation. PRNS also approved the project, and later, withdrew its approval for portions of the project citing the need to conduct its own NEPA review process. Because of the delay, the Lunny Ranch lost NRCS EQIP funding and the project has been put on hold. NRCS has assured the Lunnys that they can re-apply for EQIP funding when PRNS re-approves the project. The Lunnys plan to re-initiate the process as soon as possible.

Water system installation and operation:

Both potable and non-potable water tanks will be located on one of the highest points on the Lunny Ranch (this part was approved by PRNS). Tanks will be filled by solar pumping systems. Sufficient gravity water pressure will be available throughout the ranch, for both potable and non-potable systems, so that no additional pressure systems will be necessary. Water will be available at all times, even during extended power failures. This project will move all water on the Lunny Ranch with solar energy and gravity flow – “off the grid”. This project will also provide necessary livestock watering locations to more properly distribute cattle to reduce potential negative impacts from continuous use of the few existing livestock watering locations. It will also reduce cattle accessing sensitive wetland springs do drink. Finally, the existing water sources currently become contaminated by direct livestock access (standing in the water as they drink). Spread of disease and/or internal parasites can be a serious problem under the current circumstances. Only limited treatments can be used with certified organic cattle. This project will provide continuous, safe, clean, cold, fresh water to our certified organic livestock. The Teal Pond and the Girls Camp Spring will be fenced off to exclude cattle access.

The originally approved NRCS design included eight developed water sources (mostly springs). Calculations have been made to reduce the number of water sources that need to be developed. It appears that the number of sources can be limited to three. Additional water source on the Lunny Ranch will only be considered if: 1. the three selected sources do not provide adequate water and 2. the NPS approves of the additional source. At the non-potable water source #1, the Teal Pond, we will basically place a solar pumping system with little additional work. At the non-potable source #2, Girls' Camp Spring, will be a standard NRCS spring development similar to springs developed regularly at other locations within the PRNS, with a solar pumping system. Source #3, the Main Spring, is used for both residential and livestock purposes. This spring has historically provided and currently supplies a significant amount of water for the ranch, including the domestic water. The work at the Main Spring will be to fill the open spring hole with drain rock, cover with filter fabric, seal with topsoil and install a solar pumping system.

Reducing the project from eight to three sources created the need for more pipeline than originally estimated. The areas where most of the trenching is to occur (from the main spring to the tanks and from the tanks to the reservoir across the road) is currently producing haylage, have recently been plowed, disked, planted, mowed, harvested and/or disturbed and no sensitive plant species exist that we are aware of.

The main spring will be covered (drain rock cistern with soil cover, typical) so that surface water, birds and animals may not contaminate spring – per USPH requirements and NRCS design. The main spring solar pump will pump to tanks. The solar pump will be allowed to pump continuously during sunlight hours. It is highly doubtful that the solar pump can exceed the spring production, but a low water float in the spring will turn off solar pump if necessary. A PG&E powered pump will remain as backup to solar pump. Backup pump will only operate if water tank level drops to 1/3 capacity. A low water float in spring will turn off backup pump if necessary.

Solar pumps at the spring-fed Teal Pond and at the Girls Camp spring will pump into a 1 1/4" pipeline connected to the bottom of the tanks. Water troughs will be connected to this line. Check valves will be installed at each solar pump location and not at the tank. This will allow water troughs to fill from tanks during periods of reduced or halted pump output. It is highly doubtful that the solar pumps can exceed the spring productions, but low water floats will be installed in each spring to turn off solar pumps if necessary.

This project will replace the failed 2" galvanized pipe that runs from the dam across the road to the building complex. Recently, the 2" line ruptured under Sir Francis Drake Blvd. We temporarily routed a 2" PVC pipe through a nearby culvert, which must be removed and will be removed when this project is approved.

This project must be entirely completed as described. Partial completion would not produce the required results: Adequate water quantity, water quality, human health protection, distribution of livestock, wetland habitat protection, improved rangeland management, energy savings, cost savings, fire protection and reliability are dependent on completing the entire scope of the reduced project.

Pipeline details

Trenching and backfill sections:

From main spring to tank site:

1600' 1 1/4" HDPE pressure pipeline from pump to tanks

1100' 1 1/4" HDPE gravity flow pipeline from tanks to trough #46

1600' 1" DB120 conduit w/ pull box at night pasture fence line – for pump control wires

700' 2" DB 120 from power pole next to Coast Guard road to pump at spring. 1 pull box.

Conduit will carry power wires from panel at pole to panel at pump

From tanks to dam across road:

3400' 2" HDPE gravity non-potable feed from non-potable tanks to non-potable water system at buildings

3000' 2" HDPE gravity potable water from potable tanks to potable system at buildings

3000' 1" DB 120 from tanks to barn for tank level monitoring from barn w/ pull boxes

600' 1" DB 120 conduit from pump control panel at dam to switch location in barn

For pump control wires so that pump can be turned on and off from barn

2 road crossings:

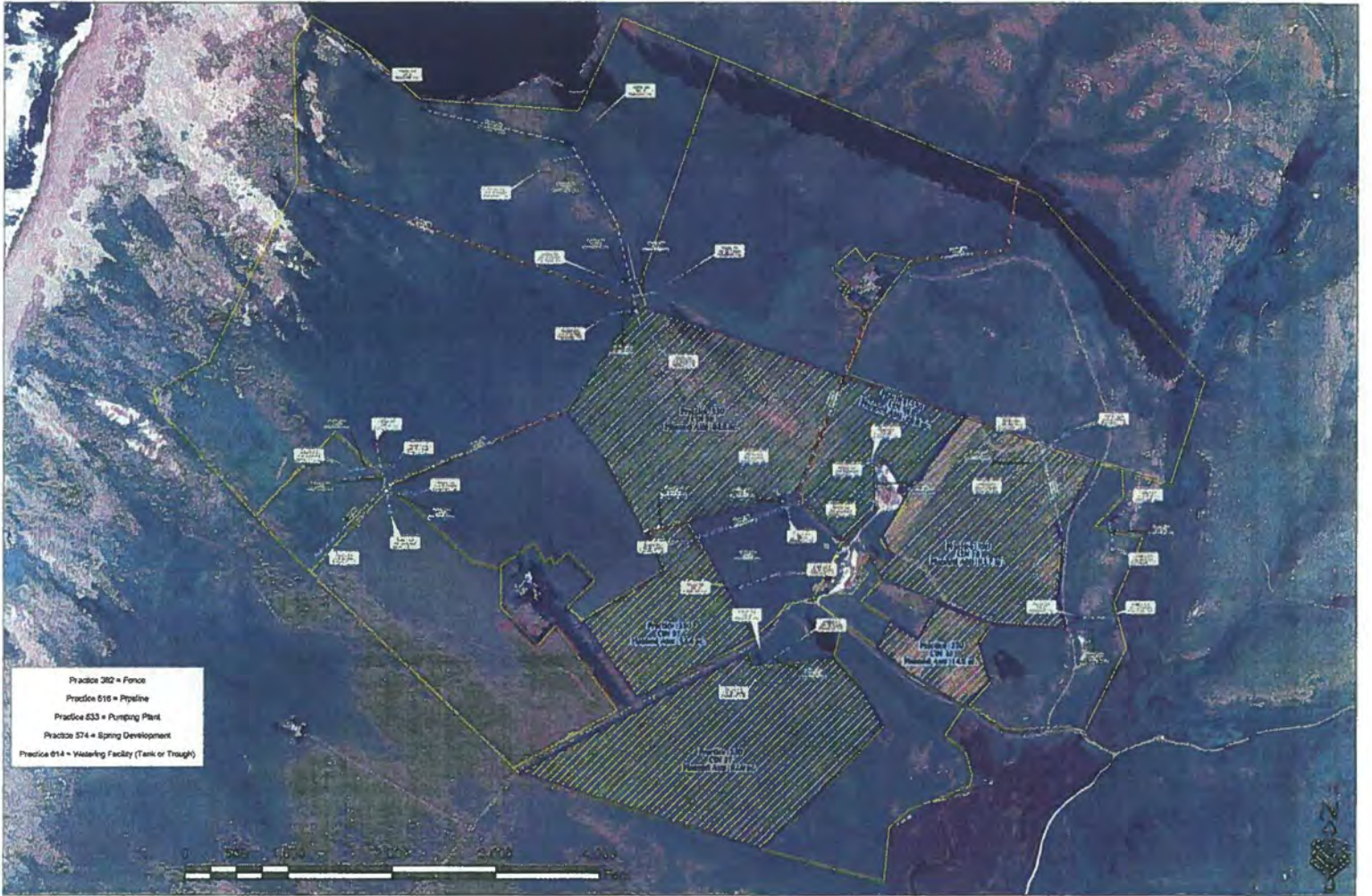
1 crossing of Sir Francis Drake Blvd. near dam - requires county encroachment permit

1 crossing of the Coast Guard road – requires Coast Guard permission

As much as possible, pipelines will be plowed in with minimal trenching required. Some pipeline connections will need to be temporarily exposed to make connections.

Approximately 18,200' 1 ¼" HDPE will be plowed. Plowing in small diameter pipelines as planned for this project will cause minimal impact. Soil is temporarily parted by a narrow (2") chisel plow equipped to simultaneously place the flexible HDPE water pipe and immediately close the opening with a press wheel. Often times, the new installation is undetectable. Plowing does not require trenching and backfilling that has the potential to disturb not only the trench line, but also the area used to store the excavated material near the trench.

The Lunnys are confident that following review, PRNS (and the current Ranch Management EA) will agree with NRCS that this particular project, as a whole, improves natural resource conservation and will allow this vital project to move forward without delay. If the NEPA EA team requires more specificity, we will be happy to provide more details.



Elk Fence Facts

The **Pastoral Zone** inside Point Reyes National Seashore:

- Was created by Congress to protect the Seashore's agricultural heritage with **no elk** present;
- Was preserved by public's refusal to allow elk in the pastoral zone in the Seashore's 1998 Environmental Assessment (EA);
- Must properly be viewed in the current Seashore Environmental Assessment as having a **no elk** baseline; and
- Is presently threatened by elk invasion.

The **Proposed 4-Mile Fence** would:

- Protect the **Pastoral Zone** from elk invasion;
- Keep elk within the Seashore's 1998 EA designated 18,000-acre Limantour elk range;
- Supports the Seashore's-own 2001 published statement that the Limantour elk range "...is monitored to ensure animals [elk] remain within Seashore boundaries, do not interfere with cattle ranches within the park and are not shedding the organism that causes Johne's disease."*
- Enhance the experience of those visitors interested in viewing Tule elk;
- Be easily, quickly and inexpensively (\$250,000 - \$300,000) constructed; and
- Eliminate the Seashore's expenses of hazing elk in the **Pastoral Zone** and rebuilding fences destroyed by elk.

*National Park Service publication "Point Reyes National Seashore 2001 Year in Review". Please see attachments for more detailed information.

Dated: November 20, 2014



Approximate
Pastoral Zone
Boundary

Proposed Elk
Fence

Inverness

Biv

Google earth

1993

Imagery Date: 4/20/2013 38°04'20.58" N 122°55'02.60" W elev 56 ft eye alt 35824 ft



Cattle guard

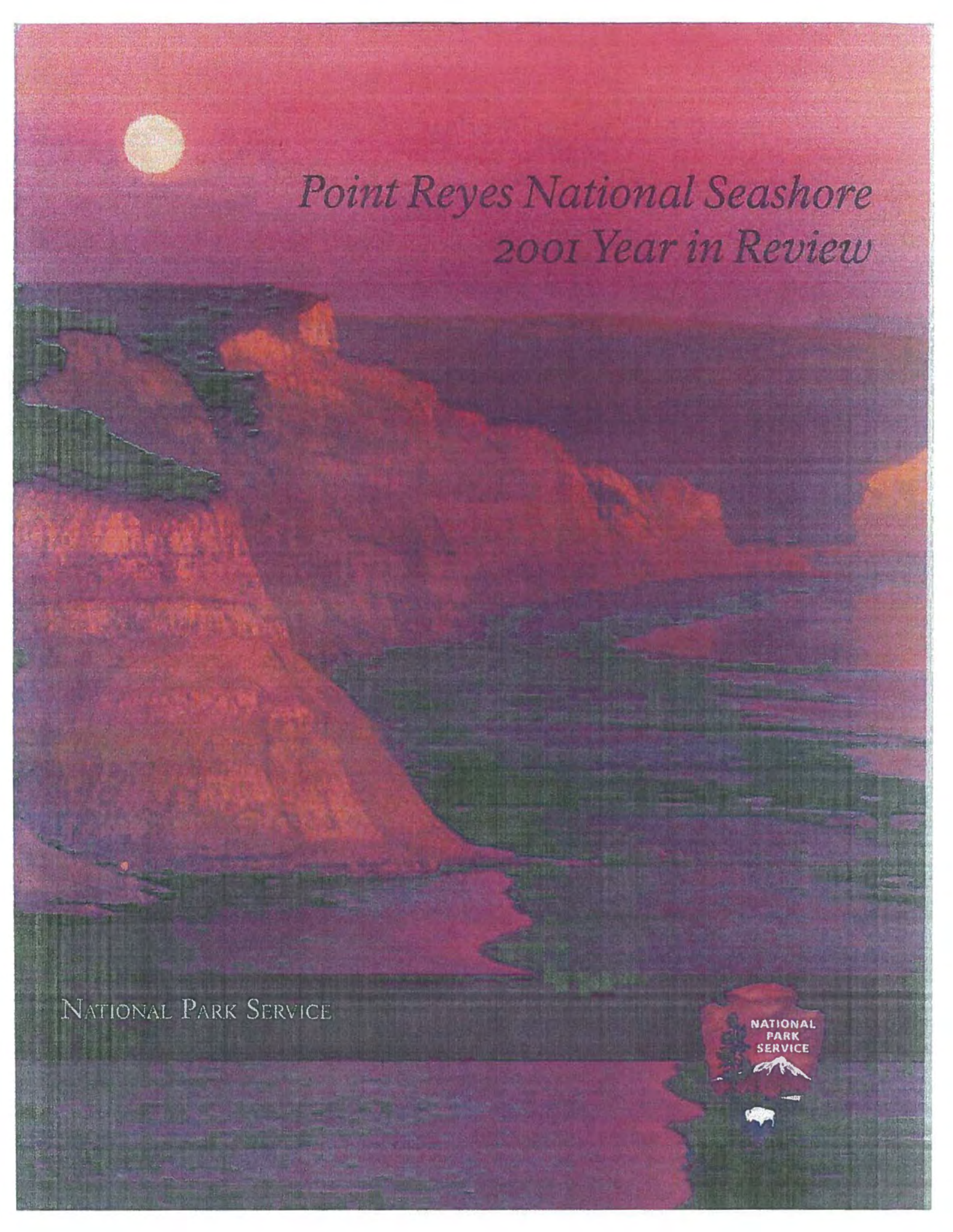
Proposed elk fence to end on steep, heavily vegetated ridge above Inverness

Stock Water Ponds to remain in Elk Range

Mt. Vision Overlook Road

Google earth

Imagery Date: 4/20/2013 38°05'38.49" N 122°52'36.21" W elev 720 ft eye alt 9182 ft



*Point Reyes National Seashore
2001 Year in Review*

NATIONAL PARK SERVICE



Native Tule Elk Range Freely at Point Reyes – An Update

The 1998 issue of *Natural Resource Year in Review* featured an article on the anticipated of the first free-ranging tule elk herd in 130 years. The release of 28 elk on June 1, 1999 marked the foundation of a restoration of the dominant herbivore to the coastal Seashore ecosystem. The released animals were captured in December, 1998 at Tomales Point, a fenced, 2,600-acre reserve at the northern extent of the Seashore, and relocated to the Limantour area of the Philip Burton Wilderness, 20 kilometers away. Before their release, the elk were quarantined for 6 months in a 21-acre enclosure and repeatedly tested for Johne's disease, or paratuberculosis; a chronic and fatal disease of livestock endemic in the Tomales Point elk herd. A stringent Johne's disease testing protocol, unprecedented in any livestock herd in the U.S.; mandated release of only test negative animals.



Since their release, the new herd has been carefully monitored to ensure animals remain within Seashore boundaries, do not interfere with cattle ranches within the park and are not shedding the organism that causes Johne's disease. Each released adult animal wears a uniquely identifiable radio transmitter collar designed to allow tracking

of locations and early detection of mortality. The majority of the animals in the relocated herd have remained within three miles of the release site. Collected data will be used to analyze habitat use, movements, and health status of the relocated elk. The current herd consists of 30 animals with 6 calves born in spring 2001. The release has enjoyed widespread support from the visiting public and local community alike. Finally, after more than a century, visitors can observe these impressive native ungulates, roaming free in their historic range.



Newly born tule elk calf and radio-collared cow in the Limantour wilderness area



Point Reyes National Seashore
Tule Elk Management Plan

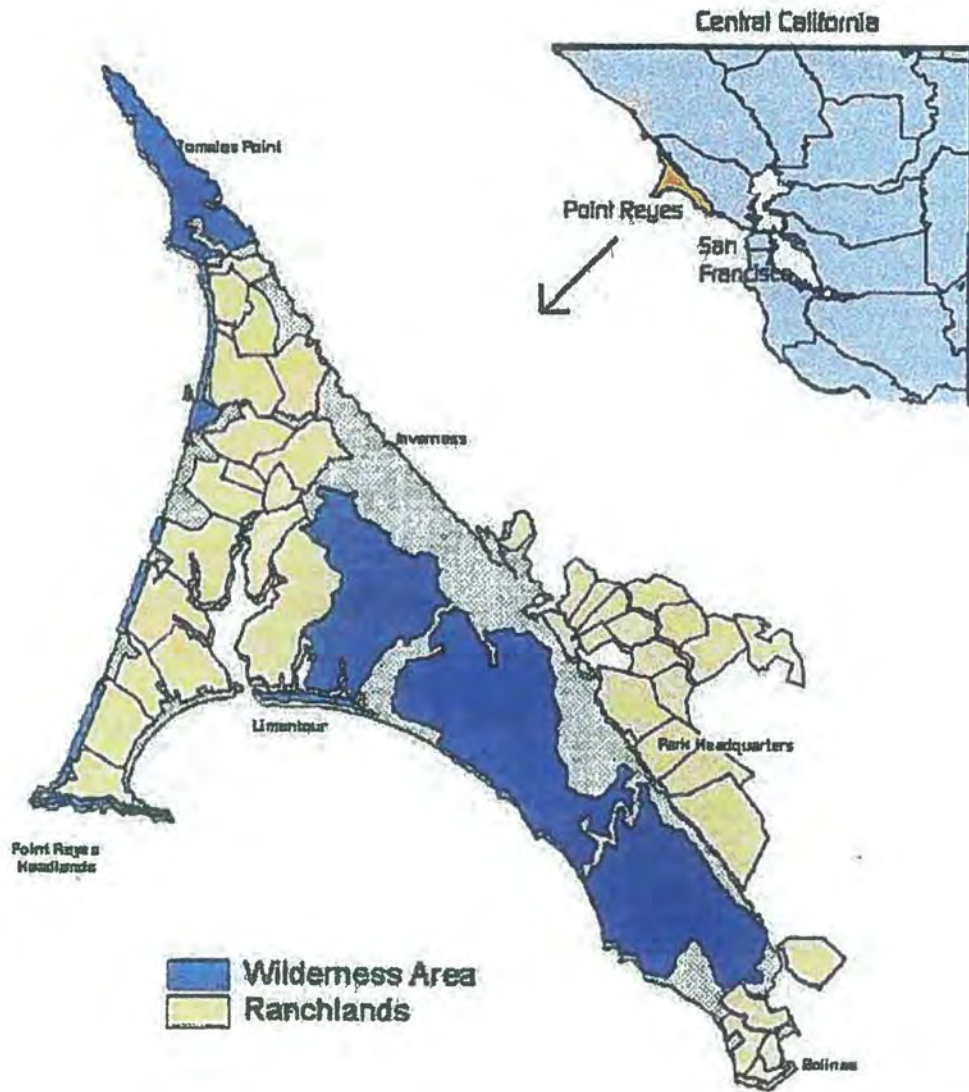


Figure 1. Map of Point Reyes National Seashore

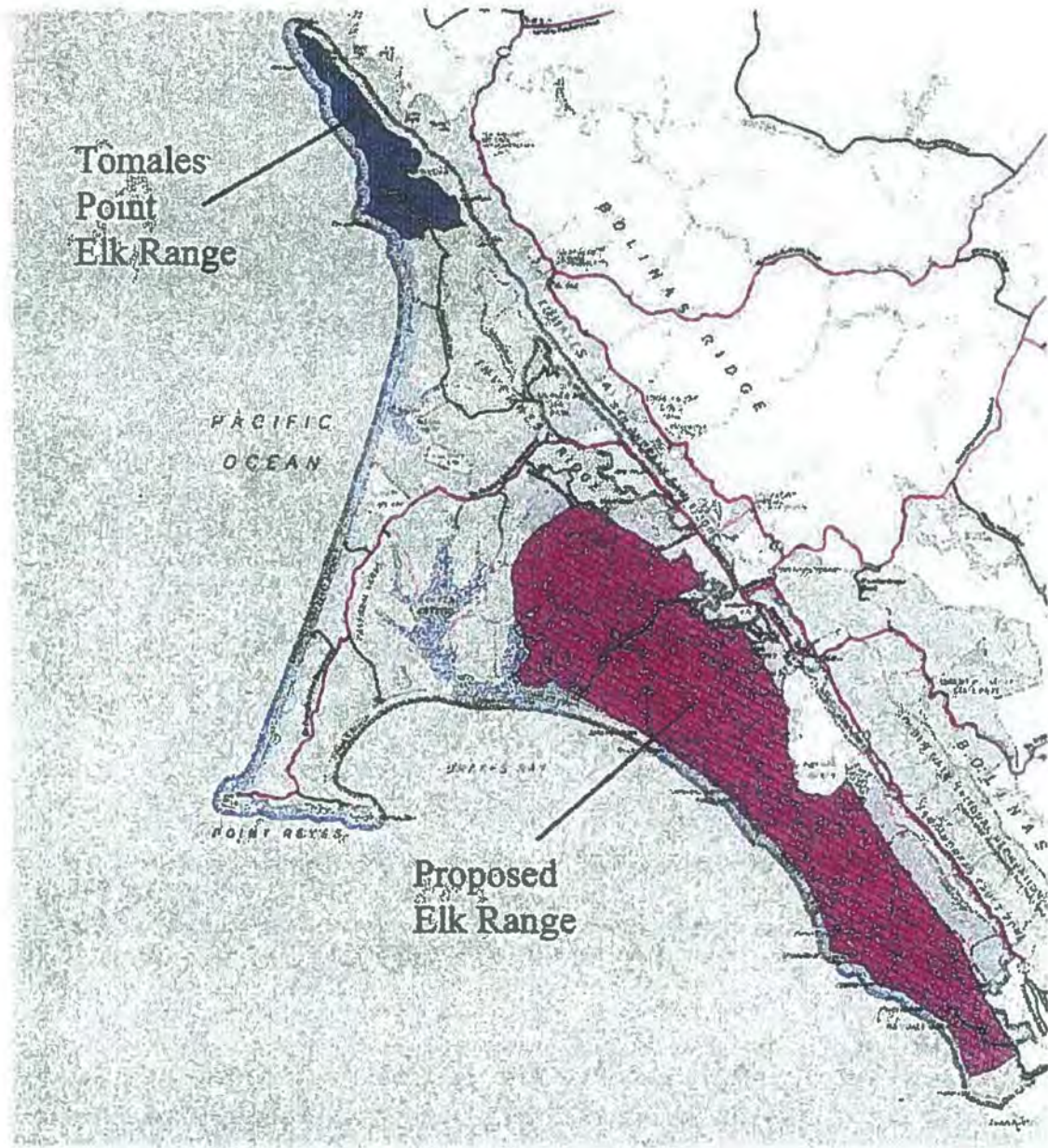


Figure 7. Map of Tomales Point Elk Range and Proposed Elk Range for relocated population.

Elk Fence Facts

Important background to the planning process:

- The pastoral zone was created by Congress to protect the ranching and farming heritage. No elk were located within PRNS when the seashore was created.
- The 1998 elk management environmental assessment included an alternative that would have allowed elk to inhabit the pastoral zone. The public rejected this alternative and the alternative to move elk into the designated elk range within the Limantour wilderness was selected.
- Elk invasion into the pastoral zone is a recent problem and should not be considered a “baseline environmental condition” of this 150+ year ranching region. The current Ranch Comprehensive Management Plan EA should properly use a no-elk baseline and consider the adverse effects of elk within the pastoral zone. Including the elk within the pastoral zone as a baseline condition would cause the process to ignore the new adverse effects on the ranches caused by the elk – the effects the public in 1998 meant to avoid by rejecting the alternative to allow elk onto the pastoral zone.
- Elk within the pastoral zone are harming ranchers’ livelihoods and threatening the future of ranching within the pastoral zone.

Facts about the proposed fence in the Limantour area:

- The proposed fence would keep the elk herd free-ranging within the 18,000 acre elk range designated and approved during the 1998 elk environmental assessment and would be consistent with the current, operative elk management plan that resulted from the 1998 NEPA EA process that approved placement into that specific elk range.
- In 2001, PRNS stated that the new elk herd located within the Limantour elk range is “monitored to ensure animals [elk] remain within Seashore boundaries, do not interfere with cattle ranches within the park and are not shedding the organism that causes Johne’s disease.” The proposed fence will help facilitate the above PRNS stated responsibilities.
- The proposed fence line location has been reviewed by experienced fence builders to insure feasibility and to create a budget.
- The fence line could be located to avoid most difficult areas.

- The 4-mile long fence could be constructed quickly.
- Fencing at Tomales Point has already proven to be an effective tool to keep elk off the pastoral zone within PRNS.
- The proposed fence is unlikely to affect visitor experience because the fence will be essentially out of sight to most Seashore visitors. It could be seen from the top of Mt. Vision Overlook and by some hikers in the vicinity.
- The proposed fence is unlikely to affect visitor experience for Seashore visitors interested in viewing Tule elk. The herd on Tomales Point and the herd in the designated elk range at Limantour will remain for viewing by seashore visitors.
- The proposed fence would have an estimated one-time construction cost of between \$250,000 and \$300,000.
- The fence would eliminate the need for PRNS to continuously spend money hazing elk that are causing damage within the pastoral zone.
- The fence would eliminate the need for PRNS to continuously spend money repairing fences damaged by elk within the pastoral zone.
- The fence would eliminate the need for PRNS to continuously spend money to develop water, pasture and other elk habitat within the pastoral zone.
- The fence would alleviate the responsibility for PRNS to continuously compensate ranchers for the pasture consumed by the invading elk.
- The proposed fence would likely protect the pastoral zone from elk invasion. At one end, the fence would terminate at the top of a steep, vegetated section of the Inverness ridge. No tule elk have been reported to have passed the Inverness Ridge. At the other end, the fence would terminate in Limantour Estero. In a similar situation at PRNS on Tomales Point, elk have died of starvation yet have never been known to cross Tomales Bay. Similarly, elk have never been seen swimming in Drakes or Limantour Esteros nor has PRNS provided any elk GPS collar data demonstrating that elk have crossed any water barrier.
- The fence would allow PRNS to focus on a one-time relocation program to move the elk back to where they were intended.
- The fence would allow PRNS to manage elk herds within wilderness areas without the need to consider, manage, mitigate or pay for ongoing damage to other permitted uses within the seashore.
- The fence would most likely save taxpayer money in the long run.
- The fence would allow the permitted, historic use of ranching to continue without competition from elk.



RECEIVED

2017 NOV 22 PM 1:17

POINT REYES NS

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November 14, 2017

Point Reyes GMP Amendment
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

RE: First Phase Comments on the Point Reyes National Seashore General Management Plan Amendment

Superintendent MacLeod:

Marin Agricultural Land Trust (MALT) was founded in 1980 to protect Marin's agricultural land for agricultural use. Over the past 37 years, MALT has invested over \$70 million to permanently preserve the agricultural utility and natural resources on 81 Marin farms and ranches totaling 49,700 acres. We also work regionally with agricultural landowners and public and private partners to support and enhance agriculture viability and sustainability. One-third of Marin County is in productive agricultural use, including the approximately 28,000 acres in PRNS and GGNRA. These family farms and ranches and the agricultural landscape they occupy are fundamental parts of the extraordinary and unique history, culture, environment, economy and character for which West Marin, Marin County and PRNS are known regionally and nationally.

Because the continuation of sustainable agriculture in PRNS and GGNRA's north district directly affects our mission, MALT unequivocally supports the continuation of sustainable farming and ranching in these areas. Together, they represent nearly a fifth of Marin's agricultural acreage and production. If these agricultural operations disappear, we face losing the critical mass necessary to sustain suppliers, processors and other services crucial to the future of agriculture countywide. These ranches also represent a significant portion of the county's managed coastal grasslands, which through cattle grazing provide habitat for endangered species, sequester carbon, store water, support pollinators, reduce wildfire danger and control invasive plants.

We believe the conceptual alternatives required by the settlement agreement, including No Ranching and Limited Management of Tule Elk, No Dairy Ranching and Management of Drakes Beach Tule Elk Herd, and Reduced Ranching and Management of the Drakes Beach Tule Herd, as well as the No Action alternative would result in major adverse impacts to the region's socioeconomic and cultural resources. We ask that, beyond the minimum required by the GMP Amendment Settlement, alternative analyses make consideration of the following:



Protecting and managing the diverse and important natural and cultural resources in the planning area

- The affected farm families have upheld for nearly 40 years (1978 Public Law 95-625) their promises to manage natural and cultural resources in a manner consistent with agricultural lease/special use permits issued and audited by NPS. They have met detailed and specific range management program activities, terms and conditions. This includes compliance with San Francisco Regional Water Quality Control Board's water quality regulations for grazing livestock and dairy operation.
- Marin County completed its Climate Action Plan Update in 2015, and the agricultural community has demonstrated that it can be an important part of the solution to climate change through carbon farming and carbon offsets. NPS should work directly and proactively with the Marin Resource Conservation District (MRCD) and Natural Resources Conservation Service (NRCS) to develop and implement carbon farm and/or conservation plans as appropriate.
- MALT works to secure the future of farming and ranching in Marin County through the conservation easements we purchase to protect the land from nonagricultural development. Once the easement is acquired, we take on the deep and permanent responsibility of supporting the landowner as they steward the land and its soil, water, plants and wildlife. Stewardship is a set of practices that maintain or improve the agricultural and natural values of the land. Some of the ways MALT supports stewardship include providing technical and financial assistance for restoration and rangeland improvement projects, offering information and resources on rangeland management, invasive weed control, and watershed health, and working with MRCD and NRCS to develop and implement carbon farm plans. In like kind, the NPS should play a more active role in supporting the management outcomes they wish to see in the planning area.

Specific strategies for managing agricultural leases and permits

- Assurance of tenancy through 20-year leases is critical to the ranchers' ability to secure financing, make necessary improvements, and implement beneficial stewardship practices. The MRCD and NRCS require 10-20 year maintenance and monitoring agreements to qualify for their programs. A 20-year rolling lease in 5, 10, or 20-year increments would enable lessees to qualify for these programs on a consistent basis and better qualify them for bank loans.
- The absence of clear guidance for agricultural operations negatively affects the decision-making ability of the rancher and NPS field-level staff. The needs to reroof barns,

manage invasive plants, and repair fences are a few examples of operational decisions that often are delayed. These delays have had financial and ecological impacts. Alternatives in the GMP Amendment will be stronger and have increased success in realizing the mutual benefits of working farms and ranches if they include guidelines to facilitate ranchers and NPS making real-time operational decisions.

- Succession is essential to ongoing land management and stewardship in the planning area. Marin has benefited greatly from the successful transition through as many as five family generations. Additionally, hand-offs of agricultural property and operations to non-family members have gone successfully with agricultural production and environmental stewardship persisting. Successful succession from current to future agriculturalists is critical to the continuation of Marin's valued working landscapes. Therefore, any alternatives should have a plan for succession to new members of existing farm families and alternative agricultural candidates if that option is not presented.
- Diversification is a proven tool for the economic viability of both individual ranches and the broader community and it is a recognized and supported tenet in the Marin Countywide Plan. Diversification has enabled Marin's small and medium sized farms to be economically viable, build additional resiliency, and to avert the risks of business failure. This is especially important because these ranches do not benefit from economies of scale that larger operations enjoy. In effect, diversification has strengthened Marin's local family farms, local economy, and local food system. For these reasons, diversification on the PRNS and GGNRA ranches and dairies should be fully considered in any analyzed alternative so that it can be facilitated going forward. This includes farm processing, farm stays, farm tours, selected crop production, forage production, and farm sales.

Specific strategies for management of Tule elk

- As evidenced by the ongoing experiences of PRNS ranches, grazing livestock and free-range elk are not compatible. Because the main herd has migrated beyond the fenced wilderness boundary area onto ranch land, they compete for feed and water resources intended for livestock, disrupting operations, and increasing operating cost, while potentially exposing the livestock to disease pathogens (Johnes).

Wilderness designated lands and Pastoral/Ranch leased lands should be given equal protection corresponding to their intended use and purpose. Intended for nature preservation, Wilderness Areas are managed by resource specialists. Conversely, Pastoral Areas are intended to be managed for agricultural use by the "rancher". There should be little allowance for commingling resource use and management styles between them. When livestock are found in Wilderness, they are removed. Likewise, when Elk are found in Pastoral Zones, management methods should be used to control their population and remove their impacts.



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As our society works to produce food for a growing world population in a sustainable manner, Point Reyes National Seashore should be viewed as an example – a place where all the ranchers work closely with the National Park Service to cooperatively manage the land in an economically viable and environmentally sustainable way. Furthermore, any alternative that might lead to a reduction in overall food production in the planning area should consider the social, environmental and economic costs of replacing that production elsewhere in the Sonoma-Marín region.

Thank you for the opportunity to comment on this phase of the GMP Amendment.

Sincerely,

A handwritten signature in black ink that reads "Jamison Watts".

Jamison Watts
Executive Director

A handwritten signature in black ink that reads "Ralph Grossi".

Ralph Grossi
Chairman of the Board





MARIN COUNTY FARM BUREAU

P.O. Box 219, Pt. Reyes Station, CA 94956 · 415-663-1231 · Manager@Marincfb.com

November 22, 2017

Superintendent Cynthia MacLeod
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, California 94956

RECEIVED
2017 NOV 22 AM 10:47
POINT REYES NS

RE: Point Reyes National Seashore and Golden Gate National Recreational Area General Management Plan Amendment

Dear Superintendent MacLeod:

The Marin County Farm Bureau (MCFB) was established in 1920 and represents approximately 300 members in Marin County including most, if not all, of the ranchers within Point Reyes National Seashore (PRNS) and Golden Gate National Recreational Area (GGNRA).

MCFB appreciates the opportunity to comment on the planning process that affects nearly 20% of Marin County's agricultural production. According to the Marin County Crop Report, the Seashore ranchers produced more than \$18 million in agricultural products in 2016. Many of these Seashore ranching families run their businesses with very small profit margins. This analysis must recognize that continued restrictions on these family farms could result in the loss of some or many of these historic ranching families. This EIS process must also evaluate the adverse economic impact to the entire county's agriculture if the Seashore ranchers were lost. Losing a significant portion of the existing agriculture in the county could result in the loss of other businesses that support agriculture. Without the critical mass, Marin and Sonoma counties could lose veterinarians, feed suppliers, equipment suppliers and others – to the detriment of all our members.

PRNS was created to protect the area from development, not from ranching. Most of the ranching families within the boundaries of PRNS were there when the seashore was formed. The area was still worth protecting because of the good stewardship of the ranchers and PRNS was created because of the ranchers' agreements. All agreed at the time of the creation of PRNS that ranching would continue. Since then, many of the ranches have been closed down by the NPS, including within the Pastoral Zone, without a public process. MCFB asks that this process evaluates and forms a new plan for PRNS whereby no more ranching is lost. A plan that would guarantee the future of the family farms within PRNS and GGNRA would greatly improve the trust and relationship between the NPS, PRNS and the gateway communities.

PRNS has shared with the public a range of alternatives to consider in this planning process. MCFB recognizes that three of the anti-ranching alternatives were required by the settlement agreement. NEPA

requires a federal agency to evaluate a full range of alternatives. In this case, the range of alternatives is unbalanced and creates a bias against the ranches. Of the six alternatives, one is the required no-action alternative, three require the removal of all or some of the ranches and the two action alternatives that would allow ranching to continue both allow elk to remain to compete with ranching and neither consider longer than 20-year leases. In addition, neither considers any recovery of ranching on previously grazed lands within PRNS or GGNRA.

To balance the range of alternatives, an alternative should be added that would prioritize cultural resource conservation and ranching. This alternative could include longer leases (up to 60 years, similar to what NPS offers ranchers and farmers in Cuyahoga National Park), should require the relocation of elk off of the ranching areas and keeping them off, evaluation of ranches recently removed from grazing (perhaps within the last 20 years) and consider restoring grazing on these ranches to provide all the necessary ecosystem services provided by grazing, as well as fire fuel reduction.

MCFB recognizes and appreciates the fact that PRNS is proposing an alternative that does not directly require the removal of any ranchers. Because of the potential adverse impacts to ranching in each action alternative, MCFB cannot fully endorse any of the proposed alternatives. MCFB looks forward to continuing to work with PRNS regarding the development of an alternative that will benefit the Seashore ranchers, as well as preserve natural resources, that can be used in the future EIS process. To fully consider the benefits of grazing on ranches recently removed from grazing and to fully evaluate the elk management plan for all elk at PRNS, the boundaries of this planning process must be expanded beyond the areas currently being leased for grazing.

This EIS process must fully explore the benefits to the ranching families, the visiting public and the natural resources that would result from providing operational flexibility for the ranchers. The plan that results from this process must include a clear path to implementing Best Management Practices (BMP) as designed by the Natural Resources Conservation Service and the Marin Resource Conservation District. The plan should allow the ranchers to mow brush at the appropriate time when that activity is necessary. The plan must have a process to allow ranchers to repair their barns and buildings. Delaying permission to take care of the ranches in a timely manner is resulting in rancher frustration, increased costs to make repairs because of delays, visitor concerns about failing infrastructure and natural resource degradation from failures to implement BMPs.

Seashore ranchers have managed the rangeland and pastureland at Point Reyes and the Olema Valley for generations. Ranchers know how to manage the resource to keep it healthy. Their futures depend on it. PRNS staff in charge with overseeing ranching activities usually has little experience and usually no experience with grazing at this particular area. Grazing limits were arbitrarily set for each ranch in 1995. Ever since, the PRNS uses these numbers to "control" ranchers' cow numbers. The current permits include these 1995 cow numbers as maximums, regardless of the weather, changes in grazing strategies, and fluctuations in forage production or pasture improvements made by the rancher.

Using strict maximum cow numbers as a management tool is wrong. This takes away the ranchers' incentive to implement better grazing practices and from implementing BMPs that would result in more soil carbon and more forage production. This EIS process must consider setting resource goals, including residual dry matter, for the pastures and rangeland and requiring the ranchers to meet the resource goals. The rancher can then implement management that will optimize forage production and resource conservation by adapting to year to year changes. The benefits could include better range and pasture

management, increased carbon sequestration in the soils due to increased photosynthesis, increased viability of the ranch businesses, increased teamwork between PRNS and the ranchers, reduced spoiled, unused forage standing in the fields due to under grazing, reduced weed proliferation, as well as other benefits. This EIS should also fully evaluate how the maximum numbers were established in 1995. Was there rancher involvement in the calculations? Were the calculations based on actual carrying capacity of each ranch separately?

This process should evaluate the benefits of requiring Seashore ranchers and the PRNS to develop succession plans to be incorporated in each individual lease. The rancher should prepare the plan and it should be approved by the PRNS. This EIS should evaluate the benefits including the rancher's succession plan in the lease, including the assurance every ranch will remain in agricultural production, simplify the re-issuance of a lease by PRNS, increased security for the next generation rancher and reduce the likelihood of conflict that can result if no plan is in place.

Small scale diversification on farms and ranches is allowed and supported in the Marin County Wide Plan as well as across the country. Diversification has saved ranches in Marin and given family members new enthusiasm to carry on the farming and ranching tradition. Diversification, including small scale row crops, various livestock species including sheep, goats, hogs, chickens and turkeys to mix into a cattle operation can have many economic and environmental benefits. PRNS should consider the benefits of allowing small scale diversification on Seashore ranches, including the fact that these are not new uses but restoring historic uses, increased ranch viability, improved visitor experience, and reconnecting Seashore ranchers to the local food system.

Agriculture is always changing due to economic factors, climate factors, market factors and regulatory factors. The Seashore ranchers were once quite diversified and very locally connected. When the PRNS was formed, the ranches had only recently transitioned into a mostly dairy monoculture. Now, as is seen outside the Seashore, the Seashore ranchers need to evolve slightly, to actually resemble more closely the historic operations.

If this process and plan results in simply "allowing" ranches to continue with many of the current restrictions, it would be putting historic families out of business. The next generation would lose interest in a struggling business and move on. MCFB hopes that PRNS will choose a path that truly supports the continuation of secure, exciting, traditional, viable, beautiful and locally connected agriculture while protecting natural resources. This can be done, and it can be done well here, at PRNS and GGNRA. Everyone benefits.

MCFB exists for its members and the communities in which we live. The Point Reyes peninsula and the Olema Valley have always been agricultural areas and have always been able to coexist with the natural wonders of these areas. Cooperative conservation requires cooperation and mutual respect among the parties. This EIS process will inform decisions that may protect this cooperation into the future, or it may support a decision that spells the end for the Seashore ranchers quickly, or over time by a thousand cuts. MCFB pledges to cooperate with PRNS in any way so that the original agreements during the formation of PRNS are respected and upheld.

The Marin County Farm Bureau fully endorses, and includes in its scoping letter by reference, the scoping letters written by the Marin County Board of Supervisors, California Farm Bureau Federation, The California Cattlemen's Association – National Cattlemen's Beef Association – Public Lands Council, Western United

Dairymen, The Marin Conservation League and the Point Reyes Seashore Ranchers Association, who together represent hundreds of thousands of local, regional and national agricultural and environmental interests.

Sincerely,

A handwritten signature in blue ink that reads "Martin Pozzi" with a stylized flourish at the end.

Martin Pozzi
1st Vice President
Marin County Farm Bureau

RECEIVED

2017 NOV 22 PM 12:37
marinwatch.org
POINT REYES NS

355 Bryant, #105
San Francisco, CA 94107
November 21, 2017

Subject: First Phase Comments for the Point Reyes National Seashore General
Management Plan Amendment

Dear Acting Superintendent MacLeod:

Introduction:

Thank you for this opportunity to provide comments during the first phase of the process for amending the 1980 General Management Plan for the lands in Marin managed by the Point Reyes National Seashore. For reasons discussed below, we urge that in at least one alternative (a) the scope of the proposed amendment be expanded to include all of the lands within the Olema Valley and Point Reyes Historic Districts, whether or not currently in ranching, (b) elk be fenced out of the pastoral zone on the Point Reyes peninsula and (c) consideration be given to the climate benefits of encouraging the ranchers to implement "best management" practices that increase carbon sequestration in the soil. *In all other respects we concur in the comments offered by the Marin County Board of Supervisors and the Marin Conservation League.*

Specific Comments:

Expansion of Scope of Proposed Amendment:

Lands have been added to the Golden Gate National Recreation area managed by the PRNS since the 1980 GMP was released. Some of these lands were being ranched when they were acquired by the NPS but are not currently ranched. They will continue to be managed without the guidance of a general management plan unless the scope of the current process is expanded to include all lands in the Olema Valley and Point Reyes Historic Districts and more recently acquired agricultural lands in the GGNRA that are managed by PRNS. A detailed plan for managing lands not currently in ranching could be deferred until the GMP Amendment for the ranches within the scope of the settlement agreement is completed.

Ranching and dairying on the greatest acreage possible as authorized in legislation creating the PRNS and GGNRA will assure the continued and increased contribution of agricultural production in the parks to the local community and economy and meet the

larger goal of preserving these cultural and historic resources. It will also reduce the management demands upon NPS staff, which are already in excess of capacity as evidenced by such examples as the sad and deteriorated condition of the once beautiful and historic Randall House, the Wilkins Ranch, which was to become more accessible to the public as an environmental education center, and the nonnative invasive species visible along Highway One south of Olema.

Perhaps the most compelling reason for expanding the scope of the GMP Amendment is the need to have the lands on the east side of Highway One grazed and managed in an environmentally sound way to reduce the fire fuel load and consequent threat to the urban areas in East Marin and the San Geronimo Valley. The recent wildfires that destroyed so much of the inhabited areas in Sonoma and Napa Counties are a fierce cautionary tale.

For planning purposes, both the 1980 GMP and the unreleased draft 1980 GMP Update include what is called a "Natural Zone." Implicit in this description is an assumption that managing land for agricultural purposes harms the land:

These areas are outside of wilderness, but would be manage to minimize adverse impacts caused by human activity to the greatest extent possible. In most cases, areas in the Natural Zone would not be as undisturbed as areas within the Wilderness Zone. Grazing activities could take place within the Natural Zone when used as a treatment tool for resource management. [Emphasis added.]

Despite the implicit assumption that land is best left unmanaged, the definition acknowledges that grazing can be a "treatment tool for resource management." Realistically, does the PRNS have the staff and other resources necessary to sporadically use grazing as a resource management treatment tool? Would the PRNS competitively bid the opportunity to temporarily bring cattle in to graze on the ranches in the southern part of the Olema Valley? Would this require preparing an Environmental Assessment first? If cattle are brought in too late, and the vegetation has become woody, cattle won't eat it. The fire fuel load that has developed will continue to increase if these lands remain unmanaged. These unmanaged lands are also a haven for invasive plant species. To see how invasive species spread on unmanaged land, take a hike through the formerly ranched Limantour Wilderness area where it is sometimes difficult at a distance to distinguish between a herd of elk and pampas grass.

Speakers at the November 2013 California-Pacific Society of Range Management meeting at the PRNS identified the benefits of managed grazing as including "ecosystem services, food production, preservation of view sheds and heritage values, fire fuel load reduction, wildlife habitat and the potential for carbon sequestration." See the report in the Marin Conservation League Jan/Feb 2014 Newsletter, beginning on page 6: www.marinconservationleague.org/images/stories/Newsletters/nl14a_janfeb2014_forweb.pdf

In addition, Sheila Barry, a Natural Resource and Livestock Advisor for the U.C. Cooperative Extension, who has been conducting applied research on grassland and oak woodland management for over 20 years, observed in a May 2015 Bay Nature article reasons why "Public Lands Need Cattle to Meet Conservation Goals:"

. . . the stewardship provided by ranchers on public lands is a significant benefit that is often overlooked. Ranchers pick up trash, watch for wildfires, talk to and help visitors, repair fences, roads and trails, and report problems at a time when budgets for park rangers and maintenance are reduced.

As Ms. Barry also said in her Bay Nature article:

Concerns with grazing on public lands have focused on overgrazing and impacts to riparian woodlands. These are legitimate concerns, but have been effectively addressed with modern range management practices, such as maintaining proper stocking rates, creating riparian pastures, limiting grazing in sensitive areas and adding off-stream water sources.

The assumption that managing land for agriculture necessarily has adverse impacts is both wrong and out-of-date. It is not supported by the science of good soil and land management. There is a world of literature on the environmental benefits of managing rangeland. For example, see the conservation benefits of invasive plant management in chapter 7 of this NRCS article:

www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045802.pdf.

In a rebuttal article, "Cattle Grazing Is Incompatible with Conservation, by Karen Klitz, of the Western Watersheds Project, and Jeff Miller, an advocate with the Center For Biological Diversity, a plaintiff in the case that led to the current environmental review process, the authors observed:

Public agencies simply do not have the staff or funding to properly monitor grazing operations, let alone reduce cattle damage or intensively rotate and manage cattle for beneficial impacts. The best-intentioned grazing management plans are often not carried out due to lack of monitoring, personnel, or funding, and can be abandoned or altered when committed and experienced project managers leave an agency. Meanwhile, our public lands suffer from soil erosion, impaired water quality, invasive weeds and damaged streams.

These remarks about public agencies not having the staff to properly monitor grazing operations are very relevant when the NPS is facing a 13% cut in a budget that is already insufficient to adequately manage the rangelands that are not in active agriculture. Engaging the stewardship services of ranchers under lease terms that allow for implementation of NRCS best management practices, including grazing, would be a cost effective way to reduce the fuel load that has developed in the Olema Valley and the consequent fire danger and spread of invasive species. Development and implementation of carbon farm plans would increase the sequestration of carbon and water in the soil resulting in both healthier soil and a reduction in GHGs in the atmosphere.

The solution to the limitations on NPS's resources to oversee the operation of agricultural leases may lie with the Cuyahoga Valley National Park model, where the Park contracts with a nonprofit corporation to manage compliance with agricultural leases. It is an

efficient and cost effective way to ensure compliance and would relieve the PRNS staff from the day-to-day responsibility for ensuring use of best management practices. It would also ensure that the ranchlands would be managed consistent with the high standards common to West Marin ranches. There are existing bodies capable of providing this service, e.g., the Marin Resource Conservation District and the Marin Agricultural Land Trust or another non-profit could be formed exclusively for this specific purpose if that were deemed more appropriate.

In addition to all of the other benefits, restoring the Olema Valley rangelands to agriculture would provide more opportunities for existing ranches to expand their capacity to support additional family members and create opportunities for new folks to become agriculturists in what otherwise becomes a closed society.

Restoring agriculture to these lands would also bring the NPS into compliance with the State of California's Coastal Management Plan. The Federal Coastal Zone Management Act requires that Federal "activities" in a coastal zone be "carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved State management programs. See 16 U.S.C. Section 1456(c)(1)(A). The California Coast Act provides that to the extent possible under Federal law, Federal agencies comply with the provision in the Coast Act. California Public Resources Code Section 300003. The same code provides in Section 30242 that:

All . . . lands suitable for agricultural use shall not be converted to nonagricultural uses unless . . . continued or renewed agricultural use is not feasible"

Benefit of Fencing Elk Out of Historic Ranch Districts:

For all of the reasons the Marin County Board of Supervisors identified in their comments, "[g]razing livestock and free-range elk are not compatible." Lands in the historic ranching districts should be given protection corresponding to their intended use and purpose as should lands in the area designated "wilderness."

In addition, one of the benefits of fencing the elk out of the pastoral zone is having more elk in the Limantour Wilderness to help keep the fire fuel load down. Instead of competing with the cattle for forage, the elk, which are both foragers and browsers, will necessarily feed more on the plentiful vegetation in the Wilderness. The PRNS may need to take additional steps to reduce the fire danger posed by the dense vegetation and dead and dying trees in the Limantour Wilderness, but having additional elk at work on the vegetation would be a good starting point for addressing the problem that has only gotten worse since the disastrous 1995 Inverness Fire.

Mitigation of Ongoing Climate Effects:

The research in preparing the draft 1980 GMP Update could be very useful in preparing a GMP Amendment, but one area in the draft that is clearly out-of-date is the proposed response to the threat of climate change. The unreleased draft focuses solely on the

“reduction of the ‘carbon footprint’ of the Seashore.” Thanks to research supported through the Marin Carbon Project since 2007, it is clear that instituting carbon farming based on NRCS-recognized “best management” practices benefits soil health, improves wildlife habitat, and could offset all of the GHGs generated in the course of managing the PRNS plus a portion of the GHGs generated by visitors to the PRNS. For history of the Marin Carbon Project, see www.marincarbonproject.org/about.

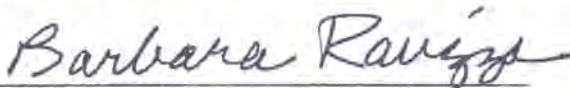
Currently the PRNS authorizes ranchers to implement what the PRNS refers to as “best management practices” for the limited purpose of protecting “sensitive resources including water quality and rare and endangered species.” See the General Management Plan Amendment Frequently Asked Questions. Developing and implementing carbon farm plans using all of the NRSC best management practices suitable to specific sites on specific ranches would yield many more benefits. For example, as identified above the benefits of managed grazing include “ecosystem services, food production, preservation of view sheds and heritage values, fire fuel load reduction, wildlife habitat and the potential for carbon sequestration.” Instituting NRCS best management practices through carbon farm plans can also increase water retention in the soil thereby increasing the growing season and reducing the need to draw water from other sources. These effects are documented in studies by UC Berkeley College of Natural Resources Prof. Whendee Silver, among others. Selected publications by Dr. Silver are listed on: <https://ourenvironment.berkeley.edu/people/whendee-silver>.

The Marin Resource Conservation District develops carbon farm plans specific to a ranch and to specific sites on a ranch. The plans take into account multiple factors, e.g., slope, soil type, water and watercourses. For two examples of carbon farm plans, including one for a ranch in Marin, go to www.carboncycle.org/carbon-farming/. The lands managed by the PRNS could become a model for the nation if the proposed GMP Amendment fully supports the long-term leases necessary for the ranchers to invest both capital and their “sweat equity” in implementing carbon-farming practices.

Thank you for considering these comments.

Respectfully submitted,

MARINWATCH



Barbara Ravizza
President



November 22, 2017

Cicely Muldoon
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes, CA 94956

NPCA attempted
to submit this
comment via the
park planning
website after
10 p.m. on Nov 22, 2017
and the website
would not accept
comments at
that time, although the
comment period was still open.
Melanie Gunn

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2017 NOV 27 AM 8:05

11:50 a.m.

POINT REYES NS

Re: NPCA comments on pre-scoping/pre-NOI, conceptual alternatives for GMPA

The National Parks Conservation Association (NPCA) provides the following comments on the pre-scoping/pre-NOI, conceptual alternatives phase of the Point Reyes National Seashore's (PRNS) General Management Plan Amendment (GMPA). These comments will be further refined through ongoing discussions with stakeholders, and we look forward to submitting more detailed comments soon.

The National Park Service's (NPS) Ranch Comprehensive Management Plan (RCMP) process generated comments across the spectrum. Some environmental groups called for the removal of ranching whereas some Seashore ranchers and ranching-interest groups called for wholesale changes to the Seashore leading to defacto privatization of a national park and damage to resources. NPCA does not support either of these egregious propositions.

SETTLEMENT AGREEMENT

Though NPCA was not a party to the lawsuit brought against the NPS, which we did not support, or the settlement agreement and its terms, we are pleased to see the matter resolved and in a form of Settlement Agreement, which demonstrates to the public that all formal parties (Plaintiff environmental groups, Defendant NPS, Defendant-Intervenors Seashore Ranchers, and Defendant-Intervenors Marin County) formally agree with the terms and conditions, including the process and timeframe established. This will hold accountable these parties that include 3 non-profits, 2 governmental agencies, and numerous Seashore Ranchers.

PURPOSE AND NEED

As this is a GMPA, the purpose and need should reflect park purposes and goals as stated in law and policy. Though this GMPA was a result of the Settlement Agreement regarding the RCMP, a GMP is broader in scope. The existing GMP is 37 years old. Perhaps there is no fundamental purpose and need more important than for NPS to include and update the environmental

industry in general, have negatively impacted the ranching community. If the NPS reimagines the purpose of the Seashore in order to address these regional, market-driven, and political issues and decisions in jurisdictions outside of the Seashore, we believe that public support for ranching and the NPS would severely be eroded.

Related, the NPS must independently verify any economic-related claims from Marin County and other jurisdictions outside the park, given factually incorrect information provided to the park, public, and elected officials over the years. For example, "*The Changing Role of Agriculture in Point Reyes National Seashore, June 2009*" by UC Cooperative Extension – Marin/Marin County was widely recognized as a hit piece intended to build animosity against the NPS as part of efforts to privatize wilderness.

Given the history of various stakeholders to overreach on the "economic analysis" topic, and the potential for this to occur moving forward, we find the aforementioned comments and concerns justified.

DIVERSIFICATION

NPCA looks forward to further discussions with stakeholders, specifically environmental groups and ranchers, to discuss the potential for diversification and associated conditions. This topic, if not approached smartly by the NPS or stakeholders, has the potential to severely erode public support for continued ranching in the Seashore. We look forward to submitting more detailed comments on diversification. That said, it is clear to us that it would be highly inappropriate to consider farming, row crops, or other non-ranching or dairying diversification activities in the pastoral zone, with the exception potentially being the consideration of these types of activities within a portion of the "ranch core" subject to various conditions.

CONCLUSION

We believe there is the potential to demonstrate that exemplary ranching and dairying can exist at PRNS – anything less would fall short of what is needed to build public trust and confidence in the NPS and continued ranching. We look forward to working with NPS and stakeholders in advancing the GMPA and ideally building a large, broad coalition in support of the final plan.

Sincerely,



Neal Desai
Director of Field Operations, Pacific Region
National Parks Conservation Association

11-21-17

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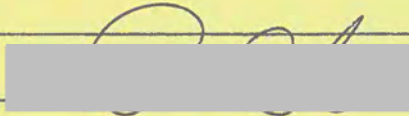
POINT REYES NS

I hope you will consider keeping
the ranches inside the seashore as working
ranches. It was with the help of these
same ranches that made the seashore possible.

I think we can all live and
work together to make this possible.

Thanks

Ron Pharis
Mill Valley, Ca





SAN FRANCISCO CA 940

22 NOV 2017 PM 5 L

GMP Admendment
% Superintendent Point Reyes Seashore
1 Bear Valley Road
94956



Ronald W Pharis



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POINT REYES NS

November 15, 2017

Cynthia MacLeod, Acting Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes, CA 94956

RE: Comments on General Management Plan Amendment Newsletter

Dear Acting Superintendent MacLeod,

I welcome for opportunity to submit comments concerning the General Management Plan Amendment (GMPA) Newsletter. I want to give my feedback about the proposed plans.

1. Protection of Natural Resources

The GMPA should protect, restore, and preserve park resources using ranch leases that ensure the multi-generational, environmentally sustainable ranching is complementary to the natural resources and visitor experiences within the park. It doesn't appear you are guaranteeing this.

2. Diversification

How exactly are you going expand the land use? What does diversification mean? Isn't the land exclusively to be used for cattle ranching? Please provide specific plans, We want to carefully analyze them to be sure diversity will be protected for real. I am unclear on this term, what it means, and what impacts this will have on park resources in the pastoral zone. The PRNS is a jewel in California. Who will benefit from the natural resources of the park, the public or big business? This is my land and your land, not your land alone.

3. Tule Elk

The only national park with a native population of tule elk that existed for thousands of years before they were hunted out of their natural habitats. The tule elk should be managed just like the Seashore's other natural resources, I cringe calling them resources. You have said nothing about the Tule elk, do you plan to "remove" them? I can say this will not happen. Should they die out so businesses can take over the land? What other animals should die out?

4. Climate Change

What about the sea level rising? Do you believe in the science or if not the data, can't argue with the data.

Thank you for the opportunity to submit my comments. I look forward to addressing them in person.

Sincerely,



Renee Kausm


Renee Rausin



SAN FRANCISCO CA 940

21 NOV 2017 PM 5 L



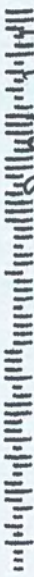
Cynthia MacLeod, Acting Superintendent
Point Reyes National Seashore

1 Bear Valley Road

Point Reyes CA

94958-0974-999

94958



Cynthia MacLeod
Acting Superintendent
Point Reyes National Seashore
[1 Bear Valley Rd.](#)
[Point Reyes Station, CA 94956](#)

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POINT REYES NS

Superintendent MacLeod,

Historic ranches in the park should stay in the Point Reyes National Seashore.

The alternative that best suits the General Management Plan amendment is to allow the continuation of farming and ranching in the Seashore and remove one herd of Tule elk threatening farming and ranching operations on the Point Reyes Peninsula.

One of the great attractions of our unique area in the Point Reyes National Seashore is the wonderful organic cheese, milk, pasture raised butter, (dairy), and grass-fed beef. The sound practices that these farms and ranches implement on a daily basis separate them above and beyond the feedlot cattle seen on I-5 in Southern California. Having working ranches allows this area to have an important purpose in supplying a very important commodity of organic food production to our town of Point Reyes, rather than turning it solely into a tourist destination. The fact that ranching families who have been here going on fourth, fifth, and sixth generations are even being considered as a possibility to be removed from the seashore, in spite of the fact of all they have contributed to our local community, is extremely disheartening.

Over-utilization of our resources in this area by tourism alone as our sole industry will tax our valuable resources of water, sewage and garbage disposal even more. This is a problem that has already been identified by the Point Reyes Village Association. We do love our tourists, but as with all places that have "been discovered" we have to continue to put safe guards in place to insure our area's survival and the ranches are key to our community's health and survival by allowing business diversification.

Our ranching families and their employees are very involved in the community and are continually giving back to the community where they reside. Ranches provide local jobs, housing, and benefits to their employees. Ranchers children and the children of their employees go to our schools, attend our community events, and fund raisers. They are also involved in various community service organizations. The ranchers live here full time and have a vested interest in keeping this area the very special community minded place that it is!

This area has always had human habitation from before recorded history. The Miwok Native Americans harvested food from the local flora and fauna because it was an area of rich natural resources way before the ranches came into being in the late 1800's. It is a part of the human condition that as we live so must we find a way to produce food for ourselves in a sustainable way, which is what the organic dairy and grass-fed cattle ranching industry is all about. These ranches are producing food

that is actually good for the environment and good for us, not poisoning us! The ranching community has been involved in working with environmental groups and the park service in making their ranching operations compliant with all the standards that have been set forth for them. The six organic dairies in the Point Reyes National Seashore have been certified organic by the USDA's National Organic Program. This is a program that adheres its farms and ranches to the strictest environmental and food safety rules and regulations, known to be enforced at this time. This should hold true for any of the organic beef ranches on the seashore, as well.

In order to have a sustainable business model, the ranchers need to be able to have 20-year leases. Few, if any, banks will take a risk in funding capital improvements for 5 years or less at favorable terms. Just as people need a healthy sustainable food source, the ranches need to have a healthy sustainable business plan. 20 years leases give the ranchers a chance to stay competitive in their given market. The Ranchers should be able to diversify as any investor does. Putting one's eggs in the proverbial one basket proves a disastrous consequence for any investor if one market segment fails to perform as well as others. So diversification of market segments allows the ranchers to overcome their business losses if one area does not perform as well as the others. This is just a wise business practice that should not be denied to the ranchers.

Respectfully Submitted,

Cathy Richards,

A Concerned Citizen, of Inverness CA



1801 East Cotati Avenue
Rohnert Park, CA 94928-3609

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POINT REYES NS

To: Cynthia MacLeod, Acting Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

From: Dr. Laura A. Watt
Professor, Department of Geography, Environment, and Planning
Sonoma State University

Re: First phase comments on the proposed General Management Plan Amendment, Point Reyes National Seashore and the northern district of Golden Gate National Recreation Area

Hand-delivered
21 November 2017

Dear Acting Superintendent MacLeod:

Thank you for the opportunity to provide comments to inform the first phase of the Point Reyes National Seashore and Golden Gate National Recreation Area (PRNS/GGNRA) General Management Plan (GMP) Amendment planning process.

My relevant expertise includes nearly twelve years as a professor of environmental history, policy, and planning at Sonoma State University, and twenty years of experience researching the history and management of PRNS, recently published by the University of California Press as a book titled *The Paradox of Preservation: Wilderness and Working Landscapes at Point Reyes National Seashore*. In addition, I have four years' experience working professionally as an environmental consultant for EDAW Inc. (now AECOM), focusing primarily on writing land management plans and EISs for federal agencies; in particular, I was project manager and primary author for the BLM's 2004 King Range National Conservation Area Resource Management Plan and EIS, which won an award for "NEPA Excellence" from the National Association of Environmental Planners. Many of the issues addressed in the King Range NCA plan are quite similar to those found at Point Reyes.

I would like to register my strong support for the continuation of ranching—both beef and dairy production—on lands managed by PRNS. As I wrote in my recent book, "The U.S. national park system contains areas that primarily aim to preserve natural scenery as well as those that primarily preserve history and cultural heritage; Point Reyes offers the suggestive possibility of protecting all types of heritage resources *together*, as a landscape whole and including the resident users' input in management, rather than separately. The continued presence of the ranches at PRNS alludes to the strength of such a broader approach, one

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more based in community collaboration, with implications for how we humans might better understand nature's role in a human-built world.”¹ I believe this current planning process is an excellent opportunity to align the Seashore's management practices with this broader, community-based approach.

My view is echoed in the attached article by Rolf Diamant (Attachment 1), retired Superintendent of Frederick Law Olmsted National Historic Site and Marsh-Billings-Rockefeller National Historic Park, recently published in the *George Wright Forum*.² In his essay, Diamant urges PRNS planners to “take a fresh look at ways to establish a more proactive, cooperative, and mutually beneficial relationship between ranching families and the seashore” (p. 118). He emphasizes the cultural significance of the ranching landscape, and specifically suggests longer-term leases, based on the model of Cuyahoga Valley National Park. I wholeheartedly agree with his essay.

The only one of the alternatives proposed so far that I support is the sixth alternative, “Continued Ranching and Removal of the Drakes Beach Tule Elk Herd,” except that I would amend it to remove elk from all currently-working landscapes in the Pastoral Zone, including Home Ranch and other ranches being affected by the Limantour herd. A separation fence may be necessary to prevent future spread of the elk onto pastoral lands. I provide more background and detail for this in point #8, below, in my specific comments and recommendations. I hope these suggestions will assist in your planning efforts as they move forward:

1. Overall Planning Context and Schedule at Point Reyes National Seashore

As a long-time land management planning instructor and professional, I find it unfortunate that this new planning effort is simply amending the 1980 GMP for Point Reyes, rather than conducting a complete GMP update, articulating an overall vision for *all* of the resource types and land uses managed by PRNS, rather than a piecemeal approach that singles out the ranchlands. Agricultural use and management does not exist in a vacuum at PRNS, and some issues in particular, like management of the tule elk, should be addressed by considering management of the entire Seashore, not just the pastoral zone. Considering the ranches in isolation from the rest of the Seashore risks missing the larger landscape picture. In particular, formerly-ranchered lands in southern end of the Olema Valley should be included in the scope of this planning effort.

In addition, I do not believe this GMP Amendment requires multiple years to complete. In contrast, writing the 20-year Resources Management Plan for the entire King Range National Conservation Area, which is a similar size and has many similar land use issues to Point Reyes, took two years, start to finish. A substantial amount of work has already been completed by the NPS from the never-released Draft GMP Update from 2010, as well as the more recent Ranch Comprehensive Management Planning process that this process now replaces, which could be utilized to help accelerate the GMP Amendment process. Additional delay in the planning process only puts more financial strain on the ranchers who

¹ Laura Alice Watt, 2017, *The Paradox of Preservation: Wilderness and Working Landscapes at Point Reyes National Seashore* (Oakland: University of California Press), at 4.

² Rolf Diamant, 2017, “Point Reyes: A Landscape Indivisible?” *George Wright Forum* 34(2): 113-19.

have been in a state of complete uncertainty about the future for five years already. I urge the NPS to proceed with this planning process as quickly as practically possible.

2. Congressional Commitment to Protecting Active, Continuing Agriculture at Point Reyes

I would like to remind you of the widespread interest in and commitment to protecting agriculture within the Seashore, even among environmentalists, stemming back to the first discussions of creating PRNS. When Point Reyes National Seashore was established in 1962 it was primarily intended to provide beach access and recreation opportunities for the nearby population of the metropolitan Bay Area, even though the landscape had been in use for dairy and beef ranching since the 1850s. Initially, ranches were to be kept in private ownership, within a designated “pastoral zone.” But for a variety of reasons they had all been acquired by the NPS by the early 1970s. The explicit intent of Congress in authorizing the acquisitions was that ranching activity remain part of the seashore, as stated by Senator Alan Bible, “At the time the initial authorizing legislation for Point Reyes National Seashore was enacted the federal government *in effect made a promise to the ranchers* in the pastoral zone that as long as they wanted to stay there, to make that use of it, they could do it. We must [now] keep our word to these people.”³

I believe that these historical intentions must be kept in mind as the Seashore moves forward with its GMP Amendment process, particularly to avoid a form of “mission creep” where commitments made early on in the park unit’s history are downplayed or overlooked as time goes by.

3. Retain all existing ranches, strengthen the ranchers’ ability to manage their lands, and recognize that the ranches, as eligible historic districts, are equally valuable and essential resources to PRNS as any natural resource or endangered species

Despite the long history of Congressional intention detailed above, the number of working ranches (i.e. not just the acreage of land used for grazing) within the boundaries has dwindled significantly since the Seashore was established—hence I do not support any proposed planning alternatives that reduce or remove either dairy or beef ranching from PRNS or GGNRA lands. Both the Point Reyes Ranches and the Olema Valley Ranches have already been found to be eligible for nomination to the National Register of Historic Places as Historic Districts; those nomination forms should be submitted and finalized, to formally recognize the ranches’ importance to the overall history and sense of place at the Seashore.

The agricultural operations on PRNS and GGNRA lands represent a substantial portion of this economy, contributing 17 percent of Marin’s overall agricultural production and 17 percent of its agricultural land base.⁴ The 2007 Marin Countywide Plan lists among its core goals the protection of the area’s working agricultural landscapes, and greater community

³ U.S. Congress, Senate Congressional Record, March 17, 1970, page S3823, written statement by Senator Alan Bible, discussing the amendment to repeal Section 4 in the 1962 legislation that established the pastoral zone; emphasis is mine.

⁴ Ellie Rilla and Lisa Bush, 2009, *The Changing Role of Agriculture in Point Reyes National Seashore*, published by the University of California Cooperative Extension.

food security by increasing the availability and diversity of locally-produced foods.⁵ Grazing on these lands also provides important ecosystem services, such as managing non-native weedy species and reducing fire danger. And most of the ranching families have historic connections to the land that go back through generations, helping to anchor the overall community's sense of identity and place.

This new GMP Amendment effort also must give close attention to assisting the present-day ranches with remaining economically viable, so that there is no further erosion to these important cultural landscapes. One way to increase their long-term viability would be to offer 20-year rolling leases, with automatic renewals each year that ranches remain in compliance (the NPS could retain its 30-day cancellation clause for non-compliance). This would give the ranching families, particularly the younger generations, greater security and encourage their willingness to invest in long-term maintenance of their leased properties and structures.

The GMP Amendment should also encourage re-use of ranches that have gone out of operation, like the Horick (D) Ranch, Rancho Baulines (Wilkins Ranch), and/or the Jewel Ranch, to bring them back into the overall continuing landscape of agriculture at the Seashore. In addition, establish Best Management Practices for ranching, including brush and weed control, fencing, water system improvements, and variable stocking density (based on climatic factors rather than a set stocking limit), and streamline the approval process for maximum flexibility for the ranchers. NPS policies should encourage and support thoughtful and timely stewardship of the land, and particularly support management practices that can assist with carbon sequestration in the soil.

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

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

1. People associated with the cultural landscape are the primary stakeholders for stewardship.
2. Successful management is inclusive and transparent, and governance is shaped through dialog and agreement among key stakeholders.
3. The value of the cultural landscape is based on the interaction between people and their environment; and the focus of management is on this relationship.
4. The focus of management is on guiding change to retain the values of the cultural landscape.
5. Management of cultural landscapes is integrated into a larger landscape context.
6. Successful management contributes to a sustainable society.⁶

⁵ Marin Countywide Plan, adopted November 6, 2007.

⁶ UNESCO, 2009, *World Heritage Cultural Landscapes: A Handbook for Conservation and Management*, at 35-36.

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

5. The NPS must take PRSRA seriously as a collaborative management partner, not just an ordinary “member of the public.”

The international policy approach to managing continuing landscapes outlined above makes clear the importance of working with local communities as primary stakeholders and management partners. In the case of PRNS, this highlights the essential importance of recognizing the Point Reyes Seashore Ranchers Association (PRSRA) as an organization that collectively represents the ranchers and their interests. Seashore staff should work collaboratively with this group to develop and maintain management of these pastoral landscapes, at a level that goes beyond just a regular member of the visiting public.

6. Establish a leasing program and management arrangement similar to that already in place at Cuyahoga Valley National Park.

PRNS could easily follow the model of Cuyahoga Valley National Park (CVNP), with its Countryside Initiative bringing agricultural use back to parts of that park after decades of absence. Starting in 1999, CVNP has worked with a non-profit cooperating partner, the Countryside Conservancy, to reestablish working agriculture via rehabilitating historic farms and farmland and offering long-term leases, up to sixty years in length, via a competitive proposal process as a way of resurrecting and maintaining the rural character of the valley.⁷

Point Reyes could establish a similar relationship with Marin Agricultural Land Trust, which has an established track record of working well with local ranchers to conserve their lands, or some other non-profit focused on cultural landscape protection and management. The non-profit could serve as an intermediary partner, negotiating lease terms (again, ideally with rolling terms), working with ranchers to maintain land management practices, and generally buffering their tenant/landlord relationships with the NPS. It would also be essential to provide a clearer, more permanent avenue for community collaboration, viewing the ranchers and other locals as stakeholders in Seashore management and planning, distinct and separate from the general visiting public (see Point #5 above). The NPS needs to recognize that residents have a different relationship to place than visitors, and particularly that working the land, especially over generations, creates a unique connection and knowledge that should be respected and incorporated into management practices.

7. Additional policies addressing agricultural diversification, restoration of pastoral lands, and ranch succession are needed.

In addition to forming this kind of a management partnership, PRNS should revise a number of its policies to encourage and strengthen long-term agricultural viability. These

⁷ <http://www.cvcountryside.org/farm-farming-home.htm>, accessed 3/8/2014. Also see <https://countrysideconservancy.worldsecuredsystems.com/countryside-initiative-program> for more information on the program.

recommendations are not new; they were clearly articulated in 2009 in a letter from Senator Feinstein to PRNS and the Seashore Ranchers Association, and then expanded in a report written by the UC Cooperative Extension office. Senator Feinstein wrote:

“What came through loud and clear at these meetings were three things: first, that Special Use Permits which allow you to operate at Point Reyes need to be issued for longer periods of time than five years. Second, that many of you would like the opportunity to diversify your operations in an effort to stabilize your income. And third, it was very apparent that the National Park Service needed to do a better job of communicating with ranchers and facilitating communications among interested groups in the West Marin area.”⁸

The UC Cooperative Extension report added detail to these recommendations, suggesting not only longer permit terms, but also formalizing agricultural diversification through the permitting process, giving ranching families more flexibility to raise different products and respond to changing market demands. It also recommends restoring agricultural uses to some lands that had been taken out of production, as part of a wider embrace of the working landscape component of the Seashore. There is absolutely a need for a clearer process for dealing with ranch succession, in case of either retirement or death of permittees, so that continuation of ranching will not come into question, whether through family members or other members of the community taking over the operation. Improved communication and utilizing ranchers in resource management are also needed, to genuinely recognize the value and commitment of these working families to the Seashore as their home and livelihood.⁹ It is also needed to overcome a lack of trust that may exist at this point, caused by permit cancellations like Horick and Tiscornia, by the Drakes Bay Oyster Company controversy, and by NPS unresponsiveness and inaction over the tule elk issue in recent years.

8. Current tule elk impacts on ranches cannot wait for this plan to be completed; they should be removed from the pastoral zone immediately.

Herds of tule elk are currently having significantly negative impacts on many of the working ranches, and should be relocated out of the Seashore’s pastoral zone entirely—including both the Drakes Beach herd, which is considered under one of PRNS’s proposed alternatives for this Amendment, and the Limantour area herd, which are not addressed by any of the alternatives. In the 1998 Tule Elk Management Plan and Environmental Assessment, the Seashore clearly stated, “The Park Service has a responsibility to be a good neighbor to adjacent and nearby landowners. Anticipating the effects of tule elk management strategies on the property or perceptions of neighbors is an important consideration. Any depredations by elk on fences, crops, or other property would require mitigation actions to correct or avoid problems.”¹⁰ The leased ranches managed by PRNS *are* your neighbors, and should receive the same attention and consideration as would be afforded to private landowners.

⁸ Letter from Senator Dianne Feinstein to PRNS and PRSRA, dated January 6, 2009.

⁹ Ellie Rilla and Lisa Bush, 2009, *The Changing Role of Agriculture in Point Reyes National Seashore*, published by the University of California Cooperative Extension, at 15-19.

¹⁰ PRNS, *Tule Elk Management Plan and Environmental Assessment*, July 1998, at 13.

In 2015 I published an article, which I am also attaching to this comment letter (Attachment 2), that details the history of tule elk across California and specifically at PRNS.¹¹ This research clearly shows that both NPS staff and wildlife scientists have been aware since the mid-late 1990s that elk relocated to the Limantour area and allowed to “free range” would inevitably be drawn toward managed pastures and negatively impact ranching operations. This work also suggests that the distinction made between the “enclosed” elk herd on Tomales Point, separated from nearby ranches by a high fence, and the “free range” herds near Limantour and Drakes Beach, is a false one. The Tomales herd roams across 2,600 acres, enough space for them to have established three separate sub-herds, and their population numbers are being at least somewhat controlled naturally by the availability of vegetation. In contrast, the Limantour and Drakes Beach herds are eating managed pasture and drinking managed water, and must traverse *across* fences, sometimes damaging the fences and/or themselves. Returning both of these herds to the designated elk range near Limantour and building a separation fence to prevent them from returning to the pastoral zone will both avoid future conflicts and result in a more independent herd of elk free-ranging southward into the wilderness zone.

Furthermore, the environmental impacts of *returning* the elk to the designated wilderness area had already been studied in the 1998 Tule Elk Management Plan. The elk range identified in the Plan is restricted to the wilderness area around and south of Limantour, not extending into the Pastoral Zone. The question for NEPA is whether or not environmental impacts have been analyzed, not about whether property is public or private. Any possible impacts of relocating elk that have wandered out of the elk range back to where they belong have already been analyzed (in the context of “neighboring” private property), and the resulting document was a Finding of No Significant Impact. Hence there should be no need for additional planning or NEPA review for returning the elk to their originally intended range in the wilderness area near Limantour, as such actions have already been determined to cause no significant impacts. This action should be implemented immediately.

9. Utilize an Appropriate Environmental Baseline for any Impacts Assessment

Lastly, once this planning process shifts into evaluating potential environmental impacts of the planning alternatives, an appropriate environmental baseline *must* be utilized. Potential impacts from ranching operations cannot be compared to a hypothetical environment with no human uses, as such a landscape has not existed at Point Reyes for hundreds or thousands of years. The Coast Miwoks’ legacy in this landscape remains an important precursor to European settlement, and archeological evidence suggests that the Coast Miwok used fire extensively to promote and maintain open grasslands at Point Reyes for several thousand years, creating the very conditions that made the Peninsula so attractive to Mexican settlers raising cattle for the hide-and-tallow industry, and later to Anglo dairiers.¹² The long-

¹¹ Laura A. Watt, 2015, “The Continuously Managed Wild: Tule Elk at Point Reyes National Seashore,” *Journal of International Wildlife Law & Policy* 18: 289-308.

¹² Email from Kent Lightfoot to Michael Newland, dated Jan 21, 2105: “The environment we are seeing at Point Reyes today is probably characterized, in large part, by a highly transformed vegetation that is the product of both the termination of Native burning and more recent fire suppression policies.” For more detail, see R. Scott Anderson, Ana Ejarque, Peter M. Brown, and Douglas J. Hallett, 2013, “Holocene and Historical Vegetation Change and Fire History on the North-Central Coast of California, USA,” *The Holocene* 23(12):

term baseline in all of West Marin has always included human use and management of pastures, and the environmental impact assessment must be completed with this history in mind.

I hope that these comments will assist you and your staff with developing a strong and effective vision for the historic and continuing ranching landscapes within the Seashore and PRNS-managed areas of the GGNRA. I will of course remain engaged with the process, and am happy to offer assistance as a scholar and planning professional at any time.

Best regards,



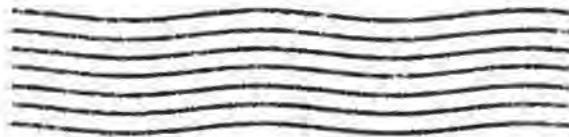
Dr. Laura A. Watt

Attachment 1: Rolf Diamant, 2017, "Point Reyes: A Landscape Indivisible?" *George Wright Forum* 34(2): 113-19.

Attachment 2: Laura A. Watt, 2015, "The Continuously Managed Wild: Tule Elk at Point Reyes National Seashore," *Journal of International Wildlife Law & Policy* 18: 289-308.

Cc: US Senator Diane Feinstein
US Senator Kamala Harris
US Representative Jared Huffman
State Assembly Member Marc Levine
President of the Marin County Board of Supervisors Judy Arnold
Marin County Supervisor Dennis Rodoni

1797-1810; also see report by R. Scott Anderson, 2005, *Contrasting Vegetation and Fire Histories on the Point Reyes Peninsula During the Pre-Settlement and Settlement Periods: 15,000 Years of Change* (Flagstaff, AZ: Center for Environmental Sciences & Education, & Quaternary Sciences Program).



Letter from Woodstock
Rolf Diamant

Point Reyes: A Landscape Indivisible?

I HAVE OFTEN THOUGHT ABOUT WRITING SOMETHING ON POINT REYES NATIONAL SEASHORE but held back. A principal reason was that there never seemed to be a break in a successive chain of legal storms that rolled in over this lovely, beleaguered seashore that might afford an opportunity to step back and do one's sums—assessing what has been gained and lost over decades of conflict and what the future may hold.

Changing circumstances, however, have overcome my reticence. Several years have passed since the National Park Service (NPS) decision not to extend the Drakes Bay Oyster Farm lease was upheld in federal courts, and a settlement was recently announced ending a separate lawsuit that threatened the continuation of more than a century and a half of agriculture at Point Reyes. This settlement has at least temporarily lifted the cloud of litigation that has hung over the 71,000-acre seashore for the past decade or more. These developments coincide with the publication of Laura Watt's comprehensive new book *The Paradox of Preservation: Wilderness and Working Landscapes at Point Reyes National Seashore* (which I shall review in a future *George Wright Forum*) that hopefully will inspire thoughtful dialogue on the seashore's past and future. And lastly, given the theme of this issue of *The George Wright Forum*, it seemed an auspicious time to make a few observations on the indivisible values of Point Reyes National Seashore, and by extension, the larger meaning of national parks today.

Almost 40 years ago I worked on a general management plan for the seashore as a young landscape architect. This was almost a decade before some in NPS began seriously thinking about rural historic districts and cultural landscapes. The plan, however, did sparingly acknowledge Point Reyes' 100-year-old dairy farms and suggested, given public support, that "this use will continue indefinitely."¹ Over time, cultural landscapes began being recognized by NPS as bona fide cultural resources and certainly my own views on their value evolved

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Figure 1. Shoreline at Point Reyes National Seashore. (Rolf Diamant)

during my tenure as superintendent of Frederick Law Olmsted National Historic Site and Marsh–Billings–Rockefeller National Historical Park. At Marsh–Billings–Rockefeller we adopted third-party certification systems for the park’s historic managed woodland that promoted and interpreted responsible environmental and social practices on this forested cultural landscape. In 2006, I was asked to help prepare an NPS publication looking at ways small family farms and producers of traditional hand-made crafts can be good stewards of the land, maintaining the character and integrity of national park cultural landscapes.² In a chapter about Point Reyes I mentioned several ranchers currently raising grass-fed beef, among them Kevin Lunny, who was also in the process of acquiring and upgrading the Johnson oyster farm in Drakes Estero. Renamed Drakes Bay Oyster Farm, the property would soon become the focus of an escalating controversy that reached all the way back to Washington when NPS decided not to extend the 40-year lease on the property, set to expire in 2012. Instead, NPS moved to fold the 2,500-acre estero (identified as “potential wilderness” by Congress in 1976) into the 30,000-acre Phillip Burton Wilderness Area.

The NPS action triggered a firestorm that was amplified in the media, particularly social media, bitterly dividing the environmental community as wilderness advocates squared off against supporters of sustainable agriculture. The conflict created much heartache for many people who sympathized with both objectives and sought to avoid a “take no prisoners” approach, hoping in vain for compromise. In adjacent rural communities emotions ran high, often estranging neighbors with opposing views from one another.

As the struggle over the lease renewal became increasingly bitter and personal on both sides, several NPS colleagues complained to me that our publication had included a photo of Lunny alongside rancher Dave Evans. I believed then as I believe today that demonizing people on an opposing side of a high-profile debate carries long-term costs, inevitably generating

the kind of intense polarization and animosity that we see far too much of in this country today. The credibility of the National Park Service is only strengthened when national parks appear unbiased, do not defensively recoil from complexity and ambiguity, and always treat everyone, even people who challenge NPS decisions, with respect.

When Secretary of Interior Ken Salazar denied the lease renewal for the oyster farm in 2012, he extended an olive branch to the park's long-established ranching community, which was increasingly worried about its future. Salazar recognized the deep historical roots of the dairy and cattle ranches at Point Reyes and sought to re-assure this community that NPS would work with them. In particular, the secretary pledged a new NPS ranch management plan aimed at extending the term of farm leases for up to 20 years (some ranches had been operating on year-to-year permit extensions). Such a step would greatly enhance economic security and viability for the 24 ranching families remaining in the park's pastoral zone. This 18,000-acre pastoral zone (20% of the seashore)—the heart of a dairy farming landscape at Point Reyes dating back to the 1860s—was identified in the park's enabling legislation. It was anticipated that the ranch management plan would further cooperation between ranchers and NPS and encourage farming practices that improve the land and better protect park resources. The plan would also promote greater sustainability, including organic certification and energy efficiency.

However, just as the last remnants of the oyster farm were being hauled away from Drakes Estero and that controversy appeared to be winding down, the promised NPS ranching management plan and new leasing arrangements were stopped in their tracks by a lawsuit, filed in February 2017, by a trio of environmental nonprofits—the Center for Biological Diversity, the Resource Renewal Institute, and the Western Watershed Project. These organizations sued to block the ranch plan and implementation of longer-term leases, arguing for a more thorough park-wide assessment of the impact of grazing on water quality, wildlife habitat, and public recreational access. Though the plaintiffs stated that they were only seeking greater environmental review of ranching activities, some people have questioned whether the ultimate goal is really to end agriculture at Point Reyes.

In July, an agreement was reached between the three environmental groups, NPS, and local ranchers that halted the litigation, and appeared to offer something for everyone. The parties agreed that the park would continue to renew ranch leases for five-year terms. The seashore would also, in lieu of the ranching plan, complete an amendment to its 1980 general management plan (GMP). According to NPS, the GMP amendment would still consider management actions brought up in the suspended ranch plan such as “agricultural diversification, increased operational flexibility, the promotion of sustainable operational practices, and succession planning.” However, it was agreed that the GMP amendment would, in addition, consider planning alternatives that might scale back or even end agriculture at Point Reyes. NPS was given four years to complete this new plan.

As the clock is once again reset at Point Reyes, I will use this 17th Letter from Woodstock to offer a few observations of my own.

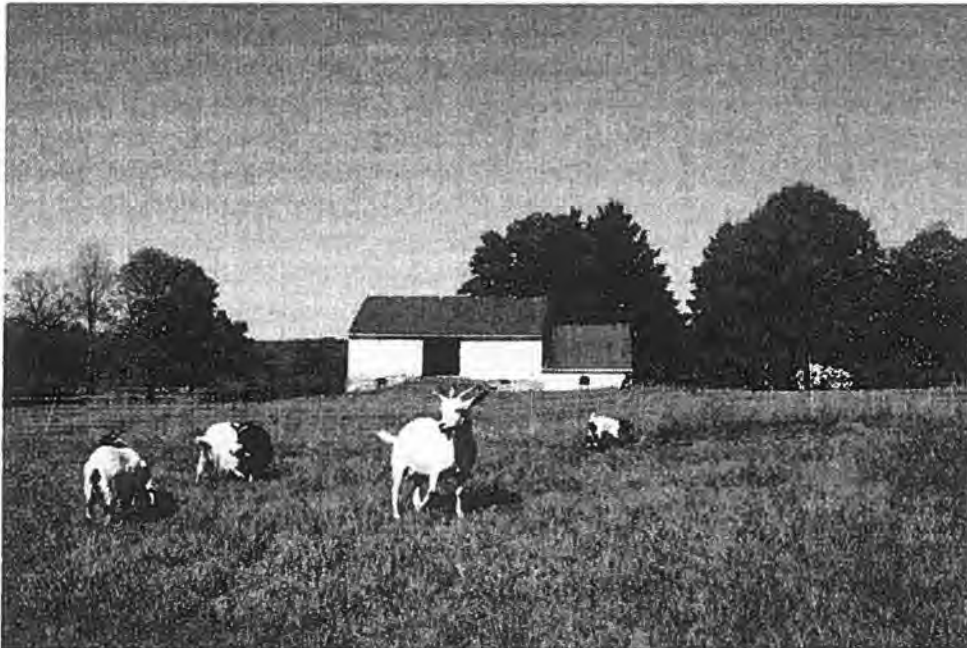
The early groundwork done for the ranch management planning appeared promising. As the new GMP amendment planning process is launched at Point Reyes, I sincerely hope

NPS will follow through on the pledge made by Point Reyes Superintendent Cicely Muldoon when that earlier ranch plan was launched—to have the park and ranchers work together to “strengthen our shared stewardship of these lands.”³

There is now an opportunity to create what has always been missing at Point Reyes (and which was notably absent in our 1980 GMP)—a more intentional and mutually beneficial working partnership between NPS and the ranch community. To see how such reciprocity can work, it is instructive to take a closer look at the successful Countryside Initiative leasing program at Cuyahoga Valley National Park. Of course, Point Reyes, in coastal California, and the Cuyahoga Valley, in the heartland of Ohio, are different in many respects, but there is still much to be learned from the latter’s initiative, started in 1999, that has revitalized their historic farming community. In particular, attention should be given to Cuyahoga’s experience with 60-year farm leases, encouraging organic “environmentally friendly” farming practices, farmers’ markets, and cooperative educational and visitor programing.

I believe NPS can use the GMP amendment planning process to encourage a much-needed dialogue on the indivisible web of natural and cultural attributes and values found at Point Reyes. Without a stake in pending litigation, NPS is free to host a long-overdue dialogue that can broaden the frame of reference and vocabulary of various interested parties. Such a conversation would focus attention on the complete assemblage of seashore resources—including the value of a peopled cultural landscape with a ranch community that represents a living, tangible connection to Point Reyes history. Referring to the work of this community as generic “commercial cattle ranching”⁴ misses this cultural/historic connection by a mile and overlooks the fact that the seashore’s iconic pastoral scenery is still maintained by grazing.

Figure 2. Goat herd, Cuyahoga Valley National Park. (National Park Service)



The challenge facing Point Reyes, as with so many other national parks, is when nature and culture, in effect, overlap each other and constantly interact in both useful and sometimes problematic ways. As Watt points out in her new book:

The continuing presence of cattle ranches on Point Reyes' rolling grasslands offers a vision of how working landscapes—places characterized by 'an intricate combination of cultivation and natural habitat,' maintaining a balance of human uses and natural forces—should be recognized as part of both natural and cultural heritages worth protecting.... Point Reyes offers the suggestive possibility of protecting all types of heritage resources together, as a landscape whole, rather than separately.⁵

What makes Point Reyes so unusual is its fascinating variety and complexity. There are beaches, grasslands, lighthouse facilities, tide pools, working ranches, early maritime radio structures, archaeological sites, streams and wetlands, scenic roads and trails, and an extraordinary variety of animals and plants. The elusive prize is to connect experiences that have too often been separated and compartmentalized in people's minds and, as Watt says, recognize "that the wild and the pastoral can not only coexist but also strengthen each other."⁶ The seashore can continue to provide a wide range of recreational, educational, and wilderness experiences for the body and mind, as well as an opportunity to see how our food can be grown in an environmentally and socially responsible manner that conserves natural and cultural heritage. Point Reyes can become a powerful example of what a more sustainable future might look like someday beyond the boundaries of a national park.

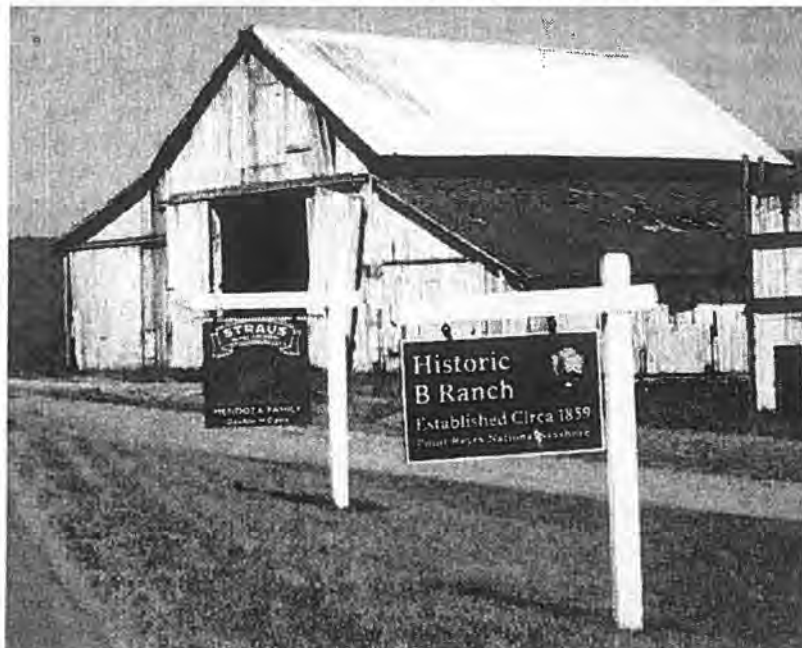
Figure 3. A mosaic of habitat at Point Reyes: in the foreground, quail use a boardwalk through a wetland; in the background, pasture. (Rolf Diamant)



There are legitimate concerns about the state of farming at Point Reyes. On a recent spring visit to the seashore I was troubled by the appearance of some of the ranches where I saw evidence of long-deferred maintenance. Longer-term leases from NPS would certainly help with securing loans and other funding needed to upgrade ranch facilities and overall management practices. The irony is not likely lost on many people, particularly the ranchers themselves, that postponing a decision on issuing more economically viable 20-year leases—for a minimum of another four years while the plan is completed—will probably only exacerbate existing challenges they face. In any case, there is an opportunity with the GMP amendment—as before with the interrupted ranch management plan—to take a fresh look at ways to establish a more proactive, cooperative, and mutually beneficial relationship between ranching families and the seashore.

I have a few suggestions for staffing the GMP amendment planning team. I would strongly recommend against a “business as usual” approach for pulling together a team. This recent agreement, for better or for worse, has given NPS yet another opportunity to finally get it right at Point Reyes when there still may be just enough residual public trust and good will to transcend a growing polarization that can all too easily propel a bitterly contested plan into the hands of Congress or the courts to resolve. I would suggest to NPS to treat this planning process like a major fire or hurricane—all hands on deck—like John Cook’s mobilization of the NPS Alaska Task Force in the 1970s. NPS should be drafting its best and brightest from across the service for this effort. It is vital that seashore personal who know the park and community the best give this process their all, even if NPS may have to backfill some of their regular duties. In particular, spend time looking at the example of Cuyahoga Valley and,

Figure 4. Historic ranch, Point Reyes National Seashore. (Rolf Diamant)



if possible, recruit someone from the Marin Agricultural Land Trust, or a similar organization knowledgeable about sustainable agriculture and partnerships, to help. And last but not least, there needs to be someone on the team experienced in the stewardship of park cultural landscapes.

Historian Dwight Pitcaithley reminds us that “the National Park System today is vastly different from the one envisioned and managed by Stephen T. Mather and Horace M. Albright.... The complexity of issues confronted by park and program managers today could not have been envisioned by the first generation of Park Service administrators.” Point Reyes National Seashore has always presented NPS with an unusual opportunity to expand the concept of what a national park can be. Deborah Moskowitz, president of the Resource Renewal Institute, commenting on the July agreement, recalled the contributions of President Franklin D. Roosevelt, who, in her words, “vastly expanded the national parks system as a way to create jobs and convey hope during the hardships of the Great Depression.”⁷ Roosevelt envisioned national parks providing spectacular scenery but also meaningful work, ecological diversity, history, craftsmanship, and recreational opportunities. Later on, wilderness was added to this growing mosaic of park values. Today, in our continuously changing, climate-challenged world, parks also provide opportunities for real-world learning, cultural continuity, and lessons about social justice, resilience, and more sustainable ways to live and work. Much of Point Reyes is a landscape that can be meaningful to people on so many different levels—indivisible now—hopefully indivisible for a long time to come.



Endnotes

1. National Park Service, *Point Reyes General Management Plan* (Denver: NPS Denver Service Center, 1980), p. 12. Online at https://www.nps.gov/pore/learn/management/upload/planning_gmp_1980.pdf.
2. National Park Service Stewardship Institute, *Stewardship Begins with People: An Atlas of Places, People, and Handmade Products* (Woodstock, VT: National Park Service Stewardship Institute, 2007).
3. “Point Reyes National Seashore Initiates Ranch Planning,” NPS press release, April 21, 2014, online at https://www.nps.gov/pore/learn/news/newsreleases_20140421_ranch_cmp_scoping.htm.
4. Jeff Miller, Center for Biological Diversity, quoted in Tara Duggin, “Ranchers Allowed 5-Year Extension to Graze Cattle in Point Reyes National Seashore,” *San Francisco Chronicle*, July 13, 2017.
5. Laura A. Watt, *The Paradox of Preservation: Wilderness and Working Landscapes at Point Reyes National Seashore* (Berkeley: University of California Press, 2017), p. 4.
6. *Ibid.*, p. 232.
7. Deborah Moskowitz, Resource Renewal Institute, “Marin Voice: Point Reyes Legal Settlement a Victory for National Parks Everywhere,” *Marin Independent Journal*, July 15, 2017.

The Continuously Managed Wild: Tule Elk at Point Reyes National Seashore

LAURA A. WATT*

1. INTRODUCTION: CONCEPTIONS AND IDEALIZATIONS OF THE WILD

In *Wilderness and the American Mind*, Roderick Nash explores the etymology of the word “wild,” which originally meant self-willed or uncontrollable. Wild, he writes, conveys the “idea of being lost, unruly, disordered, or confused. . . ungoverned or out of control.”¹ Things, creatures, or places that are truly wild can be chaotic and unpredictable. As a society, however, we are often deeply uncomfortable with actual wildness—despite the many threads of environmentalism that sing its praises. Peter Alagona points out that, even though the grizzly bear became extinct in California by 1930, *images* of grizzly bears are nearly ubiquitous across the state. The species is idealized as a magnificent representation of wildness and made into an allegory of ecological decline, although most agree daily life is much easier without having to look over your shoulder for an actual chaparral bear.² The same discomfort surfaces when calls to reintroduce predator species are dismissed as unrealistic, even when they are badly needed to stabilize overpopulations of other species, such as deer. And when existing predators turn up unexpectedly in backyards, they are often relocated or shot to limit any possibility of harm to us or our property, including livestock and household pets. We love the wild but prefer to avoid the unpredictability of wildness.

On the flip side, Alagona gives numerous examples of the idea that human engagement with wildlife somehow automatically makes it less wild, as when attempts to establish a captive breeding program for California condors in the 1970s and 1980s was resisted, on the basis that they were better off meeting “death with dignity” than ending up in a zoo. Biologists and activists

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¹ RODERICK FRAZIER NASH, *WILDERNESS & THE AMERICAN MIND* I (5th ed. 2014).

² PETER ALAGONA, *AFTER THE GRIZZLY: ENDANGERED SPECIES & THE POLITICS OF PLACE IN CALIFORNIA* 40 (2013).

alike advocated for wilderness preservation in the rugged areas where the birds nested, ignoring the fact that many condors were successfully scavenging in valley pasturelands grazed by domesticated livestock. “This meant that *real* condors lived *only* in the wilderness,” Alagona writes, “and intensive scientific management by definition robbed them of their true, wild essence.”³

It is particularly striking how flummoxed we become when “the wild” does not behave according to plan. The ultimate irony of efforts to increase habitat protection for the adorable San Joaquin Valley kit fox, for example, is that a stable and growing population is living in urban Bakersfield, even while they are decreasing in the other, more “wild” parts of their range. Yet these city dwellers are more or less invisible to most conservation efforts, except as a source of additional genetic diversity for their cousins living in nature reserves.⁴ Similarly, many popular articles on condors proudly list the number “living in the wild” but not those that remain in captivity, even though they represent the majority.⁵ We cannot seem to get our heads around a rare or endangered species that adapts itself to modern life or that is being helped along by humans. Perhaps it falls too far outside of our idealization of these creatures as wild and is often interpreted as making them less wild.

And it is not just wild animals that are idealized. The protected landscapes of the national park system are commonly imagined as wild sanctuaries for thriving ecosystems, although, as Emma Marris observes, “a historically faithful ecosystem is necessarily a heavily managed ecosystem.”⁶ In other words, the places that look the most pristine are likely the least wild in the original sense of the word, and the most controlled.

Wildlife populations in particular have been extensively manipulated and regulated. Parks have long been managed to support large populations of game animals, both to delight visiting tourists and to serve as a source of game for hunters on surrounding lands. And the National Park Service (NPS) supported this goal for decades with a vigorous predator control program.⁷ Public hunting is generally not allowed in parks, and without any external controls on populations, herds of animals, such as elk or bison, frequently grew larger than local ecosystems could support and, in some cases, were fed rather than allowed to starve to death during harsh winters or other lean times. As Richard Sellars points out, “For many, spectacular scenery may create an impression of biological health. . . the public may take for granted [for example] that unimpaired natural conditions exist, especially in the larger

³ *Id.* at 131.

⁴ *Id.* at 195–196.

⁵ A NATIONAL GEOGRAPHIC website says that “[t]oday about 127 [condors] live in the wild.” It does not mention, however, that the total population is well over 400, including those in captivity. See *California Condor*, NATIONAL GEOGRAPHIC, <http://animals.nationalgeographic.com/animals/birds/california-condor/> (last visited July 9, 2015).

⁶ EMMA MARRIS, *RAMBUNCTIOUS GARDEN: SAVING NATURE IN A POST-WILD WORLD* 12 (2011).

⁷ RICHARD SELLARS, *PRESERVING NATURE IN THE NATIONAL PARKS: A HISTORY* (1997).

parks. [But while] to the untrained eye, *unoccupied* lands can mean *unimpaired* lands. . . scientists [will] quickly recognize that human activity has caused substantial biological change.”⁸

At Point Reyes National Seashore (PRNS), established on the coast just north of San Francisco in 1962, a small group of tule elk was reintroduced in 1978, after having been locally extinct since the 1850s. The herd, just ten individuals at first, struggled in its first few years in the park, but then in the 1990s, the population grew exponentially and threatened to exceed carrying capacity. For twenty years, the tule elk were limited to a single reserve, a 2,600-acre range on Tomales Point, at the northern end of the park and separated from neighboring dairy and beef ranches by a ten-foot-high fence. In 1998, a small group from this herd was relocated to an 18,000-acre designated wilderness in the southern half of the seashore, referred to by the NPS as the Limantour area. Soon after, a few individual elk turned up at a third location, near Drakes Beach on the western shore of the large bay and estuary at the center of Point Reyes (see Figure 1). These two new herds are free to wander at will and have been causing increasing problems for the seashore’s leased ranches in recent years.

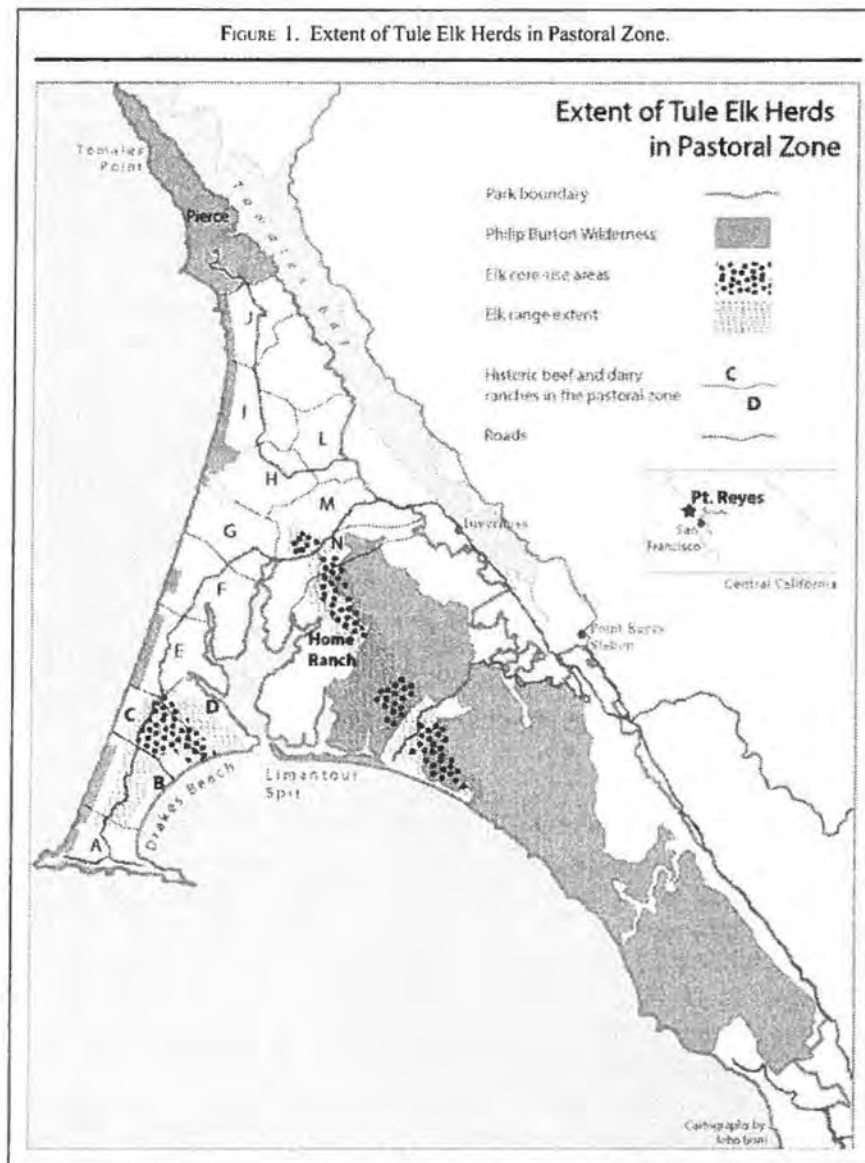
At stakeholder meetings for a ranch management planning process in November 2014, several environmental advocates called for an “unmanaged tule elk herd” at PRNS, a demand that is oxymoronic inasmuch as there has been no such thing as an unmanaged population of tule elk anywhere in California at any time since the 1870s. This article explores the history of the tule elk in California, especially its history at Point Reyes. It looks at shifting meanings of the term “wild” as it has been applied to the tule elk, vacillating between a “hands off” approach to management and an acknowledgment that management is essential to create or maintain an appearance of wildness, both for the animals and the landscapes in which they live. At Point Reyes, the question of which herds are more wild—those on Tomales Point behind a fence, or those raiding the cattle pastures in the pastoral zone—is symptomatic of a muddled approach to wildlife management that is putting the seashore’s historic ranching operations in danger.

2. EARLY HISTORY OF TULE ELK MANAGEMENT IN CALIFORNIA

Tule elk (*Cervus canadensis nannodes*) is a subspecies⁹ endemic to California, particularly the Central Valley, with an estimated population size that once

⁸ *Id.* at 287.

⁹ Tule elk, Roosevelt elk, and Rocky Mountain elk are distinct subspecies of elk. Tule elk have low genetic variability compared to other subspecies, most likely due to experiencing an extreme genetic bottleneck in the late 1800s. See E. P. Meredith et al., *Microsite Analysis of Three Subspecies of Elk (Cervus elaphus) in California*, 83 J. MAMMALOGY 801–808 (2007).



exceeded 500,000.¹⁰ This number had been reduced nearly to the point of extinction by market hunting, by the early Mexican-era hide and tallow industry and by conversion of much of the Central Valley wetlands to agriculture in the late 1800s, despite a seasonal ban on hunting imposed in 1852.¹¹ In the

¹⁰ DALE McCULLOUGH, *THE TULE ELK: ITS HISTORY, BEHAVIOR, AND ECOLOGY* 1-209 (1969).

¹¹ W. E. PHILLIPS, *THE CONSERVATION OF THE CALIFORNIA TULE ELK: A SOCIO-ECONOMIC STUDY OF A SURVIVAL PROBLEM* 14-17 (1976).

late 1870s, a lone and isolated population of two to ten individuals was found on a private cattle ranch near Bakersfield, in Kern County,¹² and protected by the ranch owner, Henry Miller. Their numbers ballooned to roughly 400 elk by 1914, when they were reported to be causing damage to crops and fences: eating alfalfa and other grasses on pastured lands and tearing apart barbed-wire fences as they moved from field to field on adjacent agricultural lands.¹³

As part of an effort to reduce the crop damage elk were causing locally, the U.S. Biological Survey and the California Academy of Sciences tried to transplant some of the Kern County elk to parks and private refuges around the state, eventually sending them to over twenty locations throughout California, including Sequoia National Park in 1905, Del Monte Park, Monterey, and Balboa Park, San Diego, in 1914–1915, and Yosemite National Park in 1920.¹⁴ This did little to solve problems in Kern County, however. After approximately 150 elk were removed from its free-roaming herd in 1914, the local population quickly rebounded to an estimated 350–400 head.¹⁵ Continued complaints from local operators about crop damage eventually led the Division of State Parks to purchase a 953-acre refuge near Tupman, Kern County. This “shifted the incidence of costs in maintaining elk from private landowners to the state government” and also enclosed the herd.¹⁶

While some relocation efforts were unsuccessful, those at Monterey and Yosemite did well but were soon causing damage to adjacent landowners’ gardens. The elk at Yosemite “were initially maintained in a 28-acre enclosure, [then] released for a while, but hazard to visitors led to their reconfinement.”¹⁷ The Tupman Reserve turned out not to be large enough to support its population of elk, and the herd there had to be maintained with alfalfa supplements.¹⁸ In 1933, biologist Joseph Grinnell lamented that none of the transplantings had resulted in “establishment under conditions of really wild freedom.”¹⁹ The

¹² Dale McCullough, Jon Fischer, & Jonathan Ballou, *From Bottleneck to Metapopulation: Recovery of the Tule Elk in California*, *METAPOPULATIONS AND WILDLIFE CONSERVATION* 375–376 (Dale McCullough, ed. 1996). Early records indicate that tule elk were extirpated from the San Francisco Bay Area by 1872. See McCrea Cobb, *Spatial Ecology and Population Ecology of Tule Elk (*Cervus canadensis nannodes*) at Point Reyes National Seashore, California 1* (2010) (unpublished Ph.D. dissertation, University of California Berkeley).

¹³ PHILLIPS, *supra* note 11, at 17–18.

¹⁴ McCullough, Fischer, & Ballou, *supra* note 12, at 377–378.

¹⁵ PHILLIPS, *supra* note 11, at 19.

¹⁶ *Id.* at 19 and in Appendix 1 at 86–88. Following subdivision of the Miller and Lux Ranch in the 1920s, Henry Miller provided land for a temporary reserve in the 1930s when the state legislature balked at creating a reserve, “until the political maneuvering subsided and the Tupman Reserve was established.” McCullough, Fischer, & Ballou, *supra* note 12, at 376.

¹⁷ McCullough, Fischer, & Ballou, *supra* note 12, at 378.

¹⁸ *Id.* at 379.

¹⁹ Joseph Grinnell, *REVIEW OF THE RECENT MAMMAL FAUNA OF CALIFORNIA* 206 (1933).

last four free-ranging tule elk were collected in 1938 and became specimens at UC Berkeley's Museum of Vertebrate Zoology.²⁰

In the early 1930s, the Yosemite herd was moved again, across the Sierras to the Owens Valley, despite opposition by local cattle operators.²¹ The Owens Valley is not part of the subspecies' original range, but the elk adapted readily. The valley is also primarily under public ownership, allowing a fair amount of relatively unrestricted space for the free-ranging herd to roam. Yet, as in Kern County earlier, the population soon increased and began causing damage to nearby alfalfa fields and to fences on private ranchlands and leased pastures, and by displacing domestic livestock. In response, the California Department of Fish and Game (CDFG) allowed culling by licensed hunters in 1943, resulting in a harvest of 43 animals. A total of seven hunts were permitted between 1943 and 1969, usually with about a hundred times more applicants for permits than the number granted.²² By this time, the animals had separated into five distinct herds, totaling 270–290 individual animals and ranging across nearly 200,000 acres of land, owned mostly by the City of Los Angeles.²³ The herds were at or close to carrying capacity for the landscape, with “further substantial increases [likely leading] to depletion owing to lack of food.”²⁴

Since they almost disappeared in the 1870s and subsequently recovered, tule elk in California have always been a managed species. Even so-called free-range populations have been managed one way or another for over a century. Biologically, the animals have done well: “Unlike many other species, and despite inbreeding and loss of genetic diversity, the tule elk shows a remarkable capacity for population growth if protected from human killing... . The behavioral plasticity of the tule elk contributes to this success, but also leads to problems of agricultural damage.”²⁵ At almost every location where they have resided, there have been reported conflicts with local ranching or agricultural interests, chiefly damage to crops, rangeland, and fences. This makes intuitive sense. This is a species that prefers open-range habitat, avoids forested areas, and so is drawn to cultivated pastures with plentiful food and water supplies. There is no surprise, then, that the number of tule elk statewide is now over 4,000, in 22 separate locations and with herd sizes that are generally stable to increasing.²⁶

²⁰ McCullough, Fischer, & Ballou, *supra* note 12, at 378.

²¹ PHILLIPS, *supra* note 11, at 20–21.

²² *Id.* at 33.

²³ *Id.* at 34.

²⁴ *Id.* at 39. In 1952, CDFG's policy was to hold the herd to 125–275 head. This was revised in 1961 to allow a herd size of 250–300, with hunts allowed only when the population was larger than 300. Hunts occurred in 1961, 1962, and 1969, the last of which “caused a great uproar.” McCullough, Fischer, & Ballou, *supra* note 12, at 379–383.

²⁵ McCullough, Fischer, & Ballou, *supra* note 12, at 376–377.

²⁶ Cobb, *supra* note 12.

3. TULE ELK ARRIVE AT POINT REYES

In 1971, responding primarily to demands from Los Angeles-based wildlife activist Beula Edmiston for unrestricted range for the tule elk, and despite the long history of conflict in the Owens Valley,²⁷ the California Legislature adopted Senate Bill 722, sponsored by newly elected Marin County representative Peter Behr. At the time, the statewide population of tule elk was about 600, chiefly the free-ranging herds in the Owens Valley and at Cache Creek in Lake and Colusa Counties, plus the small captive population at the Tupman Refuge in Kern County. The Behr bill encouraged expansion of the statewide population to 2,000 and prohibited further hunting until they hit that number.²⁸

Later that same year, an interagency task force named PRNS, established nine years earlier in 1962, as one of four suitable reintroduction sites, was chosen from a list of 23 possible locations around the state.²⁹ Park historian Paul Sadin writes:

When discussions regarding the possibility of elk reintroduction to Point Reyes began, the biggest concern among locals and park staff was the *potential for disrupting peninsula dairy and grazing operations*. State Fish and Game officials wanted the reintroduced elk to remain inside an enclosure, because of problems that free-ranging elk had created in the agricultural sector of the Central Valley. (emphasis added)³⁰

NPS proposed releasing the elk onto Tomales Point, included in a designated wilderness in 1976, as a place where elk could be separated from neighboring ranchlands by an unusually high and sturdy fence.³¹ The fence was considered “necessary to keep the elk from competing with cattle for feed and knocking down ranchers’ fences in the pastoral zone of the national seashore.”³²

²⁷ Ms. Edmiston’s organization was called the Committee for the Preservation of Tule Elk. See Summer Brennan, *Elk Growth Threatens Seashore Zoning*, POINT REYES LIGHT, July 19, 2012.

²⁸ Cal. Leg., S.B. 722 (Behr), 1971 Reg. Sess., Cal. Stat. ch. 1250.

²⁹ McCullough pushed for Point Reyes as a location for tule elk when the seashore was first being proposed. Interview with Dale McCullough, Emeritus Professor of Wildlife Biology, University of California Berkeley, Kensington, Cal. (July 13, 2015) (on file with author).

³⁰ PAUL SADIN, *MANAGING A LAND IN MOTION: AN ADMINISTRATIVE HISTORY OF POINT REYES NATIONAL SEASHORE 244* (2007), available at http://www.nps.gov/parkhistory/online_books/pore/admin.pdf.

³¹ Three places at Point Reyes were initially identified as potential elk sites, “none of which included Tomales Point. Later reexamination of conditions at Point Reyes, focused by the suggestions of [Superintendent] John Sansing, led to identification of Tomales Point as the most suitable site for reestablishment of the elk.” Memo from Richard Myshak, Acting Assistant Secretary for Fish and Wildlife and Parks, U.S. Department of the Interior, to Albert Bianchi, Attorney for Mervyn McDonald’s lawyer (April 7, 1978) (on file with author). McDonald recalls that the elk were originally supposed to be on the other point, near the lighthouse, with a fence, but the ranchers in that area protested, so the site was changed to Pierce Ranch/Tomales Point. Interview with Mervyn McDonald, Marshall, Cal. (June 23, 2015) (on file with author).

³² Philip L. Fradkin, *No Room for Cows on Point Reyes*, AUDUBON, July 1978, at 102.

When Point Reyes National Seashore was established in 1962, it was intended primarily to provide beach access and recreation opportunities for the nearby population of the metropolitan Bay Area, even though the landscape had been in use for dairy and beef ranching since the 1850s. Initially, ranches were to be kept in private ownership, within a designated "pastoral zone." But for a variety of reasons they had all been acquired by the NPS by the early 1970s.³³ The explicit intent of Congress in authorizing the acquisitions was that ranching activity remain part of the seashore: "At the time the initial authorizing legislation for Point Reyes National Seashore was enacted the federal government *in effect made a promise to the ranchers* in the pastoral zone that as long as they wanted to stay there, to make that use of it, they could do it. We must [now] keep our word to these people."³⁴

An important new overlay was added to the Point Reyes story in 1976, first in August by a federal resolution identifying Point Reyes as a possible location for reintroduction of tule elk,³⁵ and then in October by the designation of a wilderness area across roughly one-third of the peninsula.³⁶ A new "untrammled" version of the park's history thus began to coexist with its human history, with visitors and park managers increasingly envisioned as the only appropriate people within the park.³⁷ Even so, the 1976 initiatives emphasizing the wild character of Point Reyes were followed in 1978 by congressional approval of a leasing mechanism whereby the working ranches could continue operating past the original terms of their acquisition.³⁸ Clearly, PRNS is a conflicted landscape, with Congress sanctioning both its wilder aspects and the continuity of agriculture.

The first herd of ten elk (two males and eight females) arrived at PRNS in 1978, relocated from the San Luis National Wildlife Refuge in the Central Valley, where they had been moved just four years earlier from their long-time home at the San Diego Zoo.³⁹ Notwithstanding the presence of a ten-foot-high fence separating the elk's range from neighboring ranches, NPS Western

³³ This will be discussed further in LAURA A. WATT, *THE PARADOX OF PRESERVATION: WILDERNESS & WORKING LANDSCAPES AT POINT REYES NATIONAL SEASHORE* (forthcoming 2016).

³⁴ 116 CONG. REC. S3823 (daily ed. March 17, 1970) (statement of Sen. Bible) (emphasis added). He went on to say that "it is the firm intent of the Committee [on Interior and Insular Affairs] that the [statute] shall in no way operate to impair the integrity of the dairyman who wants to continue dairy farming. This explanation should make it very clear on this point." *Id.*

³⁵ Pub. L. 94-389, 90 Stat. 1189 (1976).

³⁶ Pub. L. 94-567, 90 Stat. 2692 (1976).

³⁷ Laura A. Watt, *The Trouble with Preservation, or, Getting Back to the Wrong Term for Wilderness Protection: A Case Study at Point Reyes National Seashore*, 64 Y.B. ASSOC. PAC. COAST GEOGRAPHERS 55-72 (2002).

³⁸ Pub. L. 95-625, §318, 92 Stat. 3467 (1978).

³⁹ Tule elk had been living at the San Diego Zoo since 1915. McCullough, Fischer, & Ballou, *supra* note 12, at 384.

Regional Director Howard Chapman declared that the relocation realized the goal of “reestablishing a relatively wild, free roaming tule elk herd on Tomales Point.”⁴⁰ The animals were kept and fed in a temporary enclosure at Pierce Ranch, where the long-time ranch tenant was in the process of being evicted to make way for the elk. Several elk died in the second year, and several bulls developed malformed antlers, blamed on copper deficiencies. A number of sub adults also died due to likely infection by Johne’s disease, or paratuberculosis, which is thought to have been contracted from cattle.⁴¹ A population study estimated carrying capacity for Tomales Point at 140 individuals, the NPS believing that “once the elk reached that level, the population would naturally stabilize.”⁴²

After the drought of the late 1970s ended, however, the elk population began to soar at an exponential rate, from 93 individuals recorded by the NPS in 1988 to 254 individuals recorded by an elk census in 1994.⁴³ An independent scientific advisory panel was asked in 1993 to evaluate whether control of the population size was warranted and, if so, by what method. Their report concluded that earlier estimates of carrying capacity were artificially low because of the impacts of cattle grazing and that the sustainable number for the herd should be 346, in line with a range analysis conducted the same year.⁴⁴

The panel also indicated that while a passive, natural-regulation approach to management was possible, allowing the herd to reach a dynamic equilibrium with its surrounding plant community, the consequences of such a policy would be periodic swings of population size, up and down. In the downswings, reproduction would decrease, and mortality would increase. So the visiting public might see malnourished elk or dead and dying animals, and the elk could have an increased impact on vegetation and soils.⁴⁵ On the other hand, if a series of good years pushed the population to a higher level, more active interventions might have to include removal of individual animals, perhaps through culling by agency staff, allowing public hunting, translocating elk

⁴⁰ POINT REYES NATIONAL SEASHORE, TULE ELK MANAGEMENT PLAN AND ENVIRONMENTAL ASSESSMENT 8 (July 1998), available at http://www.nps.gov/pore/learn/management/upload/planning_tule_elk_mp_ea_1998.pdf [hereinafter PRNS 1998 Plan].

⁴¹ Peter Gogan & Reginald Barrett, *Comparative Dynamics of Introduced Tule Elk Populations*, 51 J. WILDLIFE MGMT. 20–27 (1987).

⁴² Sadin, *supra* note 30, at 245. The original study was Peter Gogan, *Ecology of the Tule Elk Range*, Point Reyes National Seashore (1986) (unpublished Ph.D. dissertation, University of California, Berkeley).

⁴³ The 1988 numbers are from *Viewing Tule Elk*, NAT’L PARK SERVICE, http://www.nps.gov/pore/planyourvisit/wildlife_viewing_tuleelk.htm (last visited September 28, 2013). The 1994 and 1996 numbers are quoted in items appearing in the POINT REYES LIGHT on August 24, 2013 and November 7, 1996.

⁴⁴ Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore 7 (October 18, 1993), available at http://www.nps.gov/pore/getinvolved/upload/planning_tule_elk_report_scientific_advisory_panel_1993.pdf [hereinafter Panel Report (1993)].

⁴⁵ *Id.* at 5–6.

away from Tomales Point, or the use of an injectable contraception to prevent females from producing calves.

After the El Niño years of 1995–1997 yielded higher than average rainfall, herd size again expanded: to 380 in 1996, 465 in 1997, and 549 in 1998.⁴⁶ Researchers from state and federal agencies as well as UC Berkeley now documented higher survival rates for both adults and calves than observed in the Owens Valley herd and found no instances of predation on calves, despite numerous coyote sightings in the area. They concluded that the population showed little evidence of natural regulation and was likely to overshoot the area's carrying capacity during prolonged periods of drought, causing population die-backs. They also recommended a target population size for Tomales Point of 350 animals.⁴⁷

In May 1997, PRNS staff gave a presentation at a Citizens Advisory Commission meeting regarding the overlarge size of the elk herd on Tomales Point. According to the local paper, when commissioners learned that about a hundred calves had been born the previous year, “that was a wake up call” because they suddenly had “a 33 percent increase in population.”⁴⁸ The presentation listed four options for addressing herd size: immuno-contraception, chemical sterilization, relocating “surplus” elk to the Limantour Spit, and the shooting of “excess elk” by rangers. The PRNS superintendent told the group, “I see no easy solutions to the management of the elk... But it's important to create a long-term plan.”

4. THE 1998 TULE ELK MANAGEMENT PLAN

A year later, in July 1998, PRNS duly produced a Tule Elk Management Plan and Environmental Assessment. The Tomales Point herd at this point was approximately 550 individuals, and the statewide population of tule elk was 3,200 and growing. One of five objectives listed in the plan was to establish a free-ranging elk herd at PNRS by 2005. This was not a new goal; Phillips had advocated for a free-ranging herd throughout the seashore in a 1976 socioeconomic study,⁴⁹ and the 1993 Scientific Advisory Panel made a similar recommendation.⁵⁰ McCullough thinks there was a sense at the time that local agriculture was fading economically, and so elk, which are prone to

⁴⁶ Judd Howell et al., *Population Dynamics of Tule Elk at Point Reyes National Seashore, California*, 66 J. WILDLIFE MGMT. 482 (2002).

⁴⁷ They found immune-contraception to be effective but were concerned about the impact of removing individuals from the gene pool, given the low genetic diversity in the herd. *Id.* at 489.

⁴⁸ Marian Schinske, *Park Advisors Given Options for Limiting Tule Elk Herd*, POINT REYES LIGHT, May 22, 1997.

⁴⁹ Although PHILLIPS, *supra* note 11, oddly ignored any potential impacts on the local agricultural economy in his analysis.

⁵⁰ Panel Report (1993), *supra* note 44, at 34.

wandering long distances, would spread across the landscape as ranches were phased out.⁵¹ In public, however, the PRNS superintendent insisted that “our plan [for the free-ranging herd at Limantour] clearly does not promote elk in agricultural lands.”⁵²

Implementation did not take long. In December 1998, 45 healthy elk were relocated via helicopter from Tomales Point to a 25-acre fenced range just north of Coast Camp on the west side of Inverness Ridge, to be quarantined and monitored for six months.⁵³ Several were given immuno-contraceptives, but not all. At the time, some residents expressed concern that the relocated elk would spread to private property on the east side of Inverness Ridge, and “several ranchers in the National Seashore said that they would like park staff to fence in areas so that cattle would not mix with the elk.”⁵⁴ In June 1, 1999, Seashore staff released 23 elk from their quarantine holding pen into the Philip Burton Wilderness near Limantour Estero.⁵⁵ Each released adult animal wore a uniquely identifiable radio transmitter collar designed to allow tracking of locations and early detection of mortality.⁵⁶ PRNS’s principal wildlife scientist had been quoted four days earlier as saying elk that wandered outside of their designated range would be “retrieved or possibly killed.”⁵⁷

The management plan also seemed clear on what the policy would be:

The Park Service has a responsibility to be a good neighbor to adjacent and nearby landowners. Anticipating the effects of tule elk management strategies on the property or perceptions of neighbors is an important consideration. Any depredations by elk on fences, crops, or other property would require mitigation actions to correct or avoid problems.⁵⁸

The Plan made “no effort” to hasten the closure of ranches within the seashore and did *not* list management of elk within the pastoral zone as a “management issue not covered by this Plan.”⁵⁹ The Plan’s Alternative B would

⁵¹ McCullough Interview, *supra* note 29.

⁵² Marian Schinske, *Tule Elk to Roam Huge Range in Park*, POINT REYES LIGHT, October 30, 1997. Citizens Advisory Commissioner Merritt Robinson is quoted as saying, “We made a promise to the ranchers that we wouldn’t damage their economic position. I want the park’s tule elk management plan to speak to this issue.”

⁵³ After extensive testing for the organism that causes Johne’s disease, 22 of the translocated animals were euthanized and complete necropsies performed. Elizabeth Manning et al., *Testing for Mycobacterium avium subsp. paratuberculosis Infection in Asymptomatic Free-Ranging Tule Elk from an Infected Herd*, 39 J. WILDLIFE DISEASES 323–328 (2003).

⁵⁴ Marian Schinske, *Helicopter Gives Elk Rides from Pierce Point*, POINT REYES LIGHT, December 3, 1998.

⁵⁵ Sadin, *supra* note 30, at 246.

⁵⁶ NAT’L PARK SERV., POINT REYES NATIONAL SEASHORE 2001 YEAR IN REVIEW 11, available at <http://www.nps.gov/pore/learn/management/upload/yearinreview2001.pdf> (2001).

⁵⁷ Stephen Barrett, 18 tule elk culled from Limantour, POINT REYES LIGHT, May 27, 1999, quoting Dr. Sarah Allen.

⁵⁸ PRNS 1998 Plan, *supra* note 40, at 13.

⁵⁹ *Id.* at 3–4, 15.

have allowed elk to free-range throughout the seashore, but that alternative was explicitly rejected, based on the high impact on land uses and agriculture, as well as the short-term nature of the solution. "If population control becomes a problem," the Plan said, "it will occur on a much larger scale than at present."⁶⁰

Under the preferred Alternative A, the Limantour area was chosen for relocation because it had "large acreage in natural zones with buffers from major highways, ranches, and lands outside the Seashore." "Tule elk will be allowed to roam outside the area," the Plan said, "as long as new home ranges are not established where conflicts with traffic corridors or neighbors are likely."⁶¹ Moreover, since

"[d]amage to property could occur if elk move outside the Seashore onto private lands and consume crops or damage fences or other property. . . [the] Seashore will be ready to recapture or destroy problem animals should these situations arise, or establish partnerships with state and county agencies with the necessary skills and personnel to assist with the recapture. The Seashore should be prepared to provide funding for compensating property damage if necessary. It may be possible for the Seashore to modify parts of the habitat to help prevent such occurrences, or construct barriers to dispersal."⁶²

The plan also directed the NPS to manage the elk herd adaptively, "revising this plan as necessary to best fit new situations and information."⁶³

Within a year, however, several tule elk appeared at the former Horick Ranch, or D Ranch, which had just been forced out of operation by the NPS.⁶⁴ First, ranchers noticed two elk cows on the ranch near Drakes Beach in the summer of 2000. In the fall of the same year, one bull and one cow, both fitted with radio collars, turned up.⁶⁵ How they got there was, and remains, something of a mystery. A Park Service website says that "after relocation from Tomales Point to the Limantour area, several elk were observed to have traveled across Drakes Estero where they established a sub-herd near Drakes Beach."⁶⁶ Ranchers were informed by PRNS staff that the elk swam across

⁶⁰ *Id.* at 51.

⁶¹ *Id.* at 46.

⁶² *Id.* at 49.

⁶³ *Id.* at 50.

⁶⁴ See also Watt, *supra* note 33.

⁶⁵ Point Reyes Seashore Ranchers Association (PRSRA), History of Elk at Drakes Beach (July 5, 2011) (unpublished paper) (on file with author). Their presence was confirmed by PRNS wildlife biologist Natalie Gates, who noted during an October 21, 2000 Citizens Advisory Commission meeting that tule elk were "present at Tomales Point and in [the] Limantour area. In addition, three individuals are currently residing in the pastoral area." Transcript, PRNS Citizens Advisory Commission Meeting 109 (October 21, 2000) (on file with the author).

⁶⁶ Point Reyes, *National Seashore, California, Tule Elk*, NAT'L PARK SERVICE, http://www.nps.gov/pore/naturescience/tule_elk.htm, (last visited March 2, 2014).

Drakes Estero.⁶⁷ It is unusual, however, for female tule elk to wander such distances on their own. All elk breed in harems, where a single dominant bull controls most of the females for much of the year.⁶⁸ And it is remarkable that the elk just happened to turn up at the former Horick Ranch, the *only* section of land along the entire shore of Drakes Estero that was no longer being leased. But regardless of how they arrived, they established a new, third herd of tule elk in the seashore.

The PRNS Annual Report for 2001 notes that “[s]ince their release, the new herd [at Limantour] has been carefully monitored to ensure animals remain within seashore boundaries, *do not interfere with cattle ranches within the park* and are not shedding the organism that causes Johne’s disease.”⁶⁹ But since tule elk and cattle are both grazing animals, they are bound to compete for forage. Furthermore, like the original population at Tomales Point, the free-ranging herds at both Limantour and the Horick Ranch began to increase. By early 2014, the herd sizes were 71 and 76,⁷⁰ respectively, and a 2010 study of their population dynamics estimated that, without intervention, both herds would likely increase to approximately 400 individuals by 2018. The same study predicted that “increased elk abundance is expected to lead to future conflicts between ranch owners and Pt. Reyes management. A proactive elk management plan is recommended.”⁷¹

5. CONFLICTS WITH THE RANCHES AND NPS INACTION

Just like past experience with tule elk and ranchlands in almost all other areas of California, problems soon arose. In 2005, at least one ranch asked PRNS staff about improved fencing to keep elk out of its pastures. A meeting was held in 2008 to discuss a fencing proposal, but nothing came of it. By 2010, the Spaletta family, who lease historic C Ranch plus a small portion of the former Horick or D Ranch, wrote to new Superintendent Cicely Muldoon, asking that free-ranging elk be moved off their leased pastures. The elk were not only eating their cattle’s forage, which had to be replaced with expensive

⁶⁷ PRSRA, *supra* note 65. Several ranchers reported seeing a trailer being unloaded in the early morning hours (e.g., in a letter from Roger Horick to the WEST MARIN CITIZEN, December 5, 2013), contributing to a belief that the elk were planted on the Horick Ranch, but there is no concrete evidence of this or of who might have done such a thing.

⁶⁸ Email to the author from Dale McCullough (July 15, 2015) (on file with author) (noting that perhaps because the elk were from Tomales Point originally and had “lived several generations without significant predator presence, . . . they may have lost some of their fear of being alone due to lack of experiential reinforcement of the ingrained behavior”).

⁶⁹ PRNS Year in Review 2001, *supra* note 56, at 11 (emphasis added). Had NPS not intended to maintain separation between the elk herd and the ranches, the report would have omitted its efforts to ensure conflict avoidance.

⁷⁰ Numbers appear in a News Brief item, POINT REYES LIGHT, March 6, 2014.

⁷¹ Cobb, *supra* note 12, at 150–151.

hay, but also were damaging fences and irrigation systems.⁷² Holes in the fencing left by the elk allowed the dairy cows to stray from their proper pastures and potentially to be bred at the wrong time or by the wrong bull. At least three heifers were gored by bull elk during the breeding season, two of which had died. The letter included documentation of over \$30,000 spent by the Spalettas in response to elk damage.⁷³ Elk have caused problems on seven of the eleven seashore ranches (six dairy, five beef) so far. Perhaps most importantly, most of the ranches are formally registered as organic operations, entailing limitations on how much supplemental feed their cattle can rely on in a given year. Ranchers worry that, if elk consume too much of their pasture, they could lose their organic certification and be forced out of business.⁷⁴

PRNS staff began recording observations of the Drakes Beach elk herd in September 2010, noting a herd of roughly 40 adult animals moving back and forth across C, D, and E Ranches on a daily basis.⁷⁵ The following January, the Spalettas' Special Use Permit renewal contained a reference to a Ranch Unit Plan, a document they had received a copy of six months earlier, but with no opportunity for input or suggestions.⁷⁶ This Ranch Unit Plan presumed the presence of free-ranging elk on the leased pastures. It also contained new language regarding "wildlife friendly fencing" and newly stipulated that livestock were no longer protected from wildlife. The Point Reyes Seashore Ranchers Association (PRSRA) then sent Muldoon a letter in June, asking the superintendent to attend their next meeting to address the issue of elk migration into the pastoral zone, and specifically asking that "this issue be addressed with the Association, as a group, not with us as individual ranchers." Twenty-three Association members, each a leasee at PRNS, signed the letter, arguing that "[t]his is a regional issue that is impacting some of the ranchers on a daily basis and will certainly impact all of the ranchers if left unresolved."⁷⁷

Muldoon's response was that "The particulars of the elk issue. . . will be discussed one on one with each ranching family as part of ongoing ranch plans and permit negotiations." The refusal to work with the ranchers as a group

⁷² While the ranchers lease the land and do not own the buildings or fences, they are responsible for what is called cyclical maintenance, or day-to-day maintenance and repair. These are double costs because repairing broken fences or irrigation pipes costs money and takes time away from other tasks.

⁷³ Letter from Spaletta Family to PRNS Superintendent Cicely Muldoon (October 28, 2010) (on file with author).

⁷⁴ *Id.*

⁷⁵ Tim Bernot, *Free Range Elk Observations 9/24/10–3/1/11* (unpublished paper) (on file with author). These notes made by PNRS staff run through May 21, 2011, and document elk from the Limantour herd in several different pastures at the Home Ranch. John Dell'Osso, chief of interpretation at PRNS, later maintained that the elk typically moved onto ranch lands for only three months a year, in the fall. Mark Prado, *Rebounding Elk*, *MARIN INDEPENDENT J.*, September 5, 2011.

⁷⁶ The family's existing ranch plan dated to 1998, but they were not contacted about the new Ranch Unit Plan. They received a copy on August 12, 2011, but it was withdrawn by PRNS on August 3, 2012.

⁷⁷ Letter from PRSRA to Superintendent Cicely Muldoon (June 17, 2011) (on file with author).

was justified on the basis of the Federal Advisory Committee Act (FACA), requiring that a meeting with the PRSRA be

advertised in the *Federal Register* if the purpose of the meeting was for the agency to obtain advice, opinions or recommendations from the group acting in a collective mode. Consequently, our role at the July meeting will be to provide information about park activities, and listen to the attendees' individual views.⁷⁸

At the meeting, which took place on July 11, Muldoon talked about experimental fencing (lowering fences so that elk would not damage them) but insisted that she could not discuss overall policy with the group. Specific concerns could be discussed only in the context of individual permit negotiations. Moreover, any new plan or policy to remove elk from the pastoral zone would require environmental assessment under NEPA, above and beyond that undertaken for the 1998 management plan.⁷⁹

The assertion that FACA prohibits NPS staff from meeting or communicating with the Ranchers' Association as a group is incorrect because the statute does not apply to "meetings initiated with or by non-governmental organizations." And contrary to the claims about NEPA review, the environmental impacts of moving the elk to the designated wilderness area, regardless of what part of the seashore they came from, *had* already been studied in the 1998 Tule Elk Management Plan and Environmental Assessment, the result being a Finding of No Significant Impact.⁸⁰

The only concrete outcome of the meeting between PRSRA and NPS staff was some elk "hazing," chasing animals away from ranches, often with an off-road vehicle. This is predictably ineffective, because the startled elk simply return after a day or two. In September, the PRSRA wrote again, this time arguing that, unless the NPS enforced its own elk management policies, multigenerational ranching at Point Reyes would end. "We cannot believe that this is your intent," the letter said, "but your failure to enforce the PRNS elk management policy virtually ensures this outcome."⁸¹ The Association then also wrote to Senator Dianne Feinstein, asking for help in removing elk from

⁷⁸ Letter from Superintendent Cicely Muldoon to PRSRA (July 7, 2011) (on file with author). The PRNS 1998 Plan, *supra* note 40, FONSI at 2, said the NPS would "work to establish partnerships with organizations interested in the protection and interpretation of tule elk."

⁷⁹ Transcript of July 11, 2011 PRSRA meeting (on file with author). The experimental fencing was installed without notice a week earlier along the Drakes Beach road. Although elk damage was less likely, ranchers were concerned that cattle might also be able to jump over the lowered fences, allowing herds to mix or for cattle to get out onto the main road, where they might cause collisions with tourist vehicles and create rancher liability. The lowered section is just a small segment of miles of fencing, and it is not clear that the elk preferentially use it.

⁸⁰ The July 11 meeting also contained discussion of a firm PRNS policy under a previous superintendent, Don Neubacher, to monitor elk movements and remove animals from the pastoral zone.

⁸¹ Letter from PRSRA to Superintendent Cicely Muldoon (September 27, 2011) (on file with author).

the pastoral zone and getting the NPS to enforce existing elk management guidelines.⁸² Marin County Supervisor Steve Kinsey also wrote to Feinstein, asking that she alert Secretary of the Interior Ken Salazar to the serious nature of this ongoing problem and to the need for more effective measures to manage the elk.⁸³ Feinstein then requested a review of NPS actions, “to ensure that they are both compliant with the Elk Management Plan and [protect] the rights and property of ranching lessees.”⁸⁴

In response, the secretary reaffirmed that the National Park Service actively supports dairy and beef operations at Point Reyes, but repeated the agency’s previous assertion that the 1998 management plan did not address the issue of elk in the pastoral zone and did not address the issue of the lessees’ property rights, promising only that the NPS would “work with” ranchers to “address their concerns, preserve the unique ecological and cultural landscape of the Point Reyes peninsula, and continue to demonstrate that working ranches can be successful within the context of a national park.”⁸⁵ NPS staff cite this letter from Salazar as evidence that they cannot legally relocate elk from the pastoral zone.⁸⁶

In recent interviews, PRNS staff have stressed that the 1998 management plan did not specifically anticipate elk wandering into the pastoral zone. David Press, a wildlife specialist, said in 2013, for example, that the plan offers no guidance “if [elk] end up in areas of the park where they were not expected to roam.”⁸⁷ Yet tule elk’s tendency to be drawn toward pastoral lands has been documented in California for more than a hundred years and was unquestionably well understood by the scientists and NPS staff working on the 1998 plan. Both Judd Howell, formerly with the Biological Resources Division of the USGS but now retired and working as a private consultant, and Dale McCullough from UC Berkeley and also now retired, confirm both the general understanding that the elk were likely to migrate from Limantour onto the pastoral zone and that NPS staff specifically were aware of this, as well.⁸⁸ So the claim that the elk were not expected to roam is farfetched, and it remains unclear why a more straightforward discussion

⁸² Letter from PRSRA to Senator Dianne Feinstein (November 9, 2011) (on file with author).

⁸³ Letter from Marin County Supervisor Steve Kinsey to Senator Dianne Feinstein (March 9, 2012) (on file with author).

⁸⁴ Letter from Senator Dianne Feinstein to Secretary of the Interior Ken Salazar (March 20, 2012) (on file with author).

⁸⁵ Letter from Secretary of the Interior Ken Salazar to Senator Dianne Feinstein (May 18, 2012) (on file with author).

⁸⁶ Email to the author from PRNS Superintendent Cicely Muldoon (July 14, 2015) (on file with author).

⁸⁷ Ann Miller, *Elk Putting National Seashore Ranches at Risk, Part 2*, WEST MARIN CITIZEN, November 28, 2013.

⁸⁸ McCullough recalled “some pretty intense conversations” with former Superintendent Don Neubacher about his vision for free-ranging elk throughout the seashore and that Neubacher “certainly got on board.” He also clarified that most of the Point Reyes peninsula south of the Limantour Road, in the designated wilderness area, is actually quite poor tule elk habitat, composed mostly of forest and

of this probability was not included in the 1998 plan. Howell speculates that it was intended to avoid any political uproar by “kicking the can down the road.”⁸⁹

After a further year of inaction, the Ranchers’ Association sent another letter to Superintendent Muldoon, demanding in September 2013 that the seashore stop neglecting the problem:

Our organization has a long history of attempting to work with the Seashore on this issue, but none of the strategies employed thus far have reduced the impacts from the elk in the Pastoral Zone. It is time for the Seashore to comply with its own Elk Management Plan and permanently relocate this herd back to the Limantour wilderness area where it belongs.⁹⁰

This triggered a series of meetings with local elected officials, including Marin County Supervisor Steve Kinsey, California Assemblyman Marc Levine, and Congressman Jared Huffman, all of whom also pushed the NPS to act and, in some cases, asked for short-term relief for the ranchers negatively affected by the elk.

PRNS subsequently announced that a new Ranch Comprehensive Management Plan process would begin in spring 2014, ostensibly in response to Secretary Salazar’s November 2012 memo, forcing the Drakes Bay Oyster Company to cease operations and directing NPS to “pursue extending permits for the ranchers within those pastoral lands to 20-year terms.”⁹¹ Among other issues, the new planning process was to examine different options for managing the tule elk. The NPS conducted scoping meetings in June 2014 and two additional public workshops in November. A draft of the new plan is not expected until early 2016, and in the meantime, there is no change to the park’s management of the elk. Most ranchers are operating on only one-year lease extensions, as the NPS has insisted that it cannot renew any special-use permits until the new planning process is complete.

6. CONCLUSION: HOW WILD IS WILD?

According to Dale McCullough, recently reported “die-offs” of elk do not involve huge numbers of adult animals suddenly dropping dead from starvation

brushlands, whereas tule elk are an open-land species. “I knew eventually they would spread out onto the ranches and cause conflict.” McCullough Interview, *supra* note 29.

⁸⁹ Interview with Judd Howell, consulting wildlife biologist, H. T. Harvey & Associates, Point Reyes Station, Cal. (July 2, 2015) (on file with author).

⁹⁰ Letter from PRSRA to Superintendent Cicely Muldoon (September 19, 2013) (on file with author).

⁹¹ Memo from Secretary of the Interior Kenneth Salazar to the director of the National Park Service, regarding Point Reyes National Seashore – Drakes Bay Oyster Company 2 (November 29, 2012) (on file with author).

or thirst.⁹² He estimates that at least half the losses, maybe more, are due to lack of replacement, where calves are either not being born or are not surviving their first month.⁹³ The absence of replacement calves is harder to “see” than corpses dotting the landscape, which is perhaps why news of the die-off was treated so sensationally. Die-offs that have “wild” causes are somewhat more difficult to foresee than those stemming from human control of herd size via culling or contraception, but the likelihood of population decline in the face of California’s current intense drought was clearly anticipated years ago by scientists.⁹⁴ News about the drop in numbers at Tomales and Limantour (the Drakes Beach herd, which spends the most time on cultivated lands, has continued to increase) has nonetheless been exploited by environmental activists, who have attempted to spin the story politically, using public sympathy for dying “wild animals” to create pressure, ironically, for a policy that would create even more “wildlife.” But removing the elk fence from Tomales Point, allowing those animals to roam more freely for food or water, and possibly driving the ranches out of business would not resolve the management conundrum.

The Tomales Point herds, because their movement onto ranches is limited by the elk fence, are ecologically fairly “natural,” in that their population will fluctuate up and down in response to vegetation availability and particularly its seasonality (i.e., lots of grass in the winter but almost nothing near the end of the dry season), as long as the public is willing to accept the down-cycles in numbers, which perhaps the recent outbursts in the press show the public is increasingly unwilling to accept.⁹⁵ On the flip side, the herds at Limantour and Drakes Beach are much less natural, inasmuch as they are being artificially supported by the ranchers’ fertilized fields and managed water supplies.⁹⁶ Their numbers are not constrained in any meaningful way by natural resources and will, therefore be governed one way or another only by what managers do. As McCullough put it, “There is nothing to stop the expansion of these southern herds except human interference. . . . If ranchers are improving the range, that will be even more attractive to the elk than the natural vegetation, especially during the dry season.”⁹⁷

The herd living on the former D Ranch of about a thousand acres and spilling over from there on a regular basis onto working leased ranches are

⁹² Peter Fimrite, *Conservationists Upset as Much of Point Reyes Elk Herd Dies*, SAN FRANCISCO CHRONICLE, April 19, 2015 (reporting a drop in the Tomales Point herd from 540 in 2012 to 286 in 2014).

⁹³ McCullough Interview, *supra* note 29.

⁹⁴ See PHILLIPS, *supra* note 11; Howell et al., *supra* note 46.

⁹⁵ Without artificial water sources, the carrying capacity at Tomales Point would be substantially reduced. They are either old stock ponds or springs developed by former ranchers into year-round water sources.

⁹⁶ In fact, during the same two years the Tomales Point herd declined by 47 percent, the free-ranging herds located at least part-time in the pastoral zone increased by 32 percent. Fimrite, *supra* note 92.

⁹⁷ Email from McCullough (July 15, 2015), *supra* note 68.

nevertheless romantically referred to by the NPS and environmentalists as “free ranging,” while the animals in the Tomales Point Wilderness Reserve of about 2,600 acres are described as “fenced in” or “enclosed.” As a practical matter, then, how freely elk at Point Reyes can move within a more or less limited space seems to be the key factor determining whether they are considered wild or not, even though they are all living in a landscape that has been substantially tamed and controlled since the middle of the nineteenth century.

Thus the politics of tule elk management at Point Reyes, where the elk, it is important to note, are not endangered or threatened at present, are bound to seem fairly bizarre to most students of wildlife law and policy. They revolve around wild animals that actually seem to prefer and thrive better on cultivated ranch lands, with carefully husbanded pastures and water sources, than in protected areas designated as wilderness, which are increasingly brushy and have little water, especially in drought years.⁹⁸

Thus, the distinction between wild and non-wild is and has been for some time very much a moving target at Point Reyes. The literature on wild animals tells us that much the same is true elsewhere. Historically, state officials have accepted the need for human management of the tule elk. Again, there is nothing exceptional about this. Lots of other large mammals in California, and in other states, are similarly managed through hunting or culling, including the iconic wild bison in Yellowstone National Park. And demand for tule elk hunting tags across California is enormous. Of the 22 locations around the state where there are tule elk, hunting is allowed at 18 of them (eight in the Owens Valley alone), and in 2014, there were over 33,000 applications for only 316 tags.⁹⁹ Over the past 15 years, however, as the preceding account establishes, the NPS has willfully ignored the necessity for active elk management at Point Reyes, instead operating under an intentionally hands-off policy, presuming that because the elk can plausibly but incorrectly be portrayed as wild animals, any human intervention somehow makes them less so and less fitting residents of a national park.

It is not at all clear to me, nor I think to others, that effective management of tule elk at Point Reyes ought to be swayed by romanticized notions of animals as wildlife, ideas that ignore the reality of the species’ history in California, where tule elk have been continuously managed at least since the Miwok and other tribes burned the landscape to create better forage for elk and

⁹⁸ PHILLIPS, *supra* note 11, at 90 notes that while tule elk generally tend to avoid human activity, “when dependent on a cultivated area (for example, alfalfa during a drought), they will not let the presence of man interfere with their feeding for long. He will only drive them away temporarily.”

⁹⁹ See California Department of Fish and Wildlife, Wildlife Branch—Game Management, 2014 Elk Hunt Statistics, online at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=95655&inline> (last visited May 18, 2015).

to draw them to their hunting grounds.¹⁰⁰ Calls for removal of the ranches at Point Reyes also fly in the face of their well-established status as a recognized heritage resource, not to mention their role in the local economy, as well as the declared intention of Congress that the creation and operation of PRNS will protect the working landscape. The prioritization of tule elk at Point Reyes that are “wild” ignores their long history of being managed and controlled, as well as the necessity of continuing that control. Free-ranging or not, these animals live in a cultivated landscape, and pretending that they will ever be free from human intervention only makes clear-headed management more difficult to implement.

¹⁰⁰ “The environment we are seeing at Point Reyes today is probably characterized, in large part, by a highly transformed vegetation that is the product of both the termination of Native burning and more recent fire suppression policies.” Email from Kent Lightfoot, professor of anthropology, University of California Berkeley, to Michael Newland, Anthropological Studies Center, Sonoma State University (January 21, 2015) (on file with author).

RECEIVED

2017 NOV 27 AM 7:53

POINT REYES NS

11:45

Vivien Straus

November 22, 2017

GMP Amendment c/o Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

(comment
period was
still open)

Please note:

Vivien Straus attempts to submit this comment at the end of the comment period on 11/22/2017 around ~10 p.m. and the website was not accepting comments. She submitted this comment to me via email on 11/27/20
Melanie Gunn

Thank you for the ability to comment during this process.

I grew up on a dairy in Marshall in West Marin and now own and manage that same farm.

I am in support of keeping the ranches in the park and giving them extended rolling leases of 20 years.

I love the park. And I truly believe the ranches can co-exist.

Here are a few of my thoughts:

1. The mandate of the park is to maintain the culture and history of the region/park. Commercial dairying and cheesemaking in California began on the Point Reyes peninsula. For this reason, the farms should stay.
2. Longer leases allow farms to obtain loans and thereby better maintain good stewardship practices (which cost money) and make needed repairs.
3. The elk should be kept out of the pastoral zone and away from the ranches. The intent, as I understand, was that they were to live in the Limantour and Tomales Point areas and not in the pastoral zone.
4. I suggest the park work with an organization that has experience in managing Tule Elk herds to help figure this out.
5. Considering that agriculture is a different set of skills, the management of overseeing the ranchers and maintaining good stewardship practices, could be overseen by an agricultural organization (like MALT, or something along those lines) or by hiring staff with an agricultural background. Sustainable practices should be outlined and monitored and supported.
6. I believe the ranchers should be allowed to diversify as well as be able to have housing for their families and workers.
7. The park's inclusion of the ranches make this park unique. That's exciting, and a good thing.

8. I worry that since these ranches comprise approximately 20% of the farms in Marin County, if they were to be closed, it would be the death knell for the rest of agriculture in the region. It's crazy to live in a region where there is so much talk about supporting local food. Yet, losing these farms will kill that option. We, in the San Francisco Bay Area, are lucky in that we're unlike the rest of the country where food travels an average of 1,500 miles to get to the plate.

Many thanks.

Vivien Straus
Co-owner and manager



RECEIVED

2017 NOV 22 AM 10: 03

POINT REYES NS

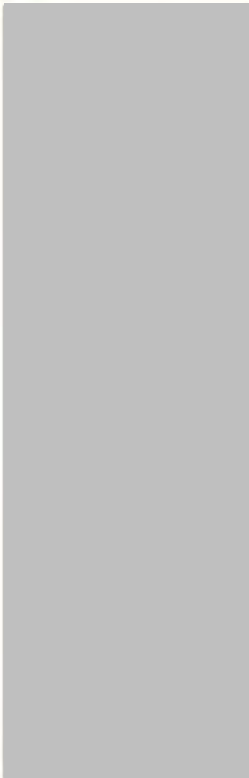
11/19/17

DEAR NIPS,

PLEASE CONTINUE TO
ALLOW RANGING. JUST
GIVE THE RANGERS MORE
GUIDELINES FOR STEWARDSHIP.

REMEMBER THAT IF IT
WEREN'T FOR THEM, PT,
REYES WOULDN'T EXIST, IT
WOULD HAVE BECOME ANOTHER
LA.

THANK YOU, ...



Mr. Dimitri Treiakoff

2017 NOV 22 AM 10: 03

POINT REYES NS

SAN FRANCISCO CA 940

20 NOV 2017 PM 6 L



GMP AMENDMENT
C/O SUPERINTENDENT
PT. REYES NAT'L SEASTORE
1 BEAR VALLEY ROAD
PT. REYES STATION, CA
94956

94956-973333



GMP Amendment
c/o Superintendent
Point Reyes National Seashore
1 Bear Valley Road, 94956

RECEIVED
2017 NOV 21 PM 1:15
POINT REYES NS

Superintendent:

I was a general practitioner of medicine in Pt. Reyes Station for 44 1/2 years, retiring in 2015, and have been a strong supporter of agriculture in PRNS — and in Marin County — from the beginning, as well as a strong supporter of the park's environmental mission, early on as president of the board of the Inverness Association, a life member of Point Blue — formerly Point Reyes Bird Observatory, whose first home was on the old Heims Ranch in the seashore — and a long-term member of the Environmental Action Committee.

I am writing to recommend that the tradition of dairy and beef-cattle ranching be continued by PRNS with 20-year leases to the ranchers — as directed by President Obama's Secretary of the Interior Ken Salazar in a Decision Memorandum to the park — to insure the viability of their operations and the stability of ranching countywide.

At a time when attacks on our government are at an all-time high and trust is at an all-time low, it is especially important for the government to honor its stated commitment to agriculture. An EIR to help the park meet its obligation to endangered species and the introduction of better practices to mitigate the impact of cattle on the parklands is appropriate and will further cooperation between ranchers and the park. It should be remembered that after the park was founded with its dual mission of preserving ranchlands and wildlands, it served as a template for cooperation between environmentalists and agriculturists nationwide.

This is a tradition that should also be preserved.

Sincerely,


Michael Whitt




Marks, James <james_marks@nps.gov>

General Management Plan Amendment Initial Public Comment Period RE: future and balance of historic agriculture and reinvigorated natural resources & recreation

1 message

Kett Kettunen Zegart <ketz@aol.com>
To: "Marks, James" <james_marks@nps.gov>

Tue, Nov 21, 2017 at 3:19 PM

James Marks> I was not able to use this address:
<https://parkplanning.nps.gov/poregmpa>.

Please, could forward it to (or use an address the Park Planning dept. shall give you.) Thank you so much, I believe this is the original address where I e-mailed this letter:

National Park Service
/ Pacific West Information Center / Golden Gate National Recreation Area

Margaret Kettunen Zegart

November 20 2017

Superintendent , Golden Gate National Recreation Area & Point Reyes National Seashore

RE: General Management Plan Amendment Initial Public Comment Period

Dear Superintendent :

PLEASE RESUME WORKING WITH THE WORKING BEEF CATTLE AND DAIRY RANCHES AND INCLUDE IN THE AMENDED/UPDATED MANAGEMENT PLAN

Consideration of these ranches as a cultural historic resource area of highest value to retain within the

Include (a) Map original ranching area by parcel ownership (b) map of current ownership, (3) produce and financial assets for Marin County (4) Add mapping of land characteristics. (5) Use one farm - preferably the ranching area now a grading a paving business to recreate a demonstration ranch. Create one former ranch site as the original working model -of a demonstration historic ranch. and preservation of open space, working methods for visitor experience (as in other National Parks) Include early cattle, livestock shelters, early equipment and earliest home shelters.; (6) combine archaeology, Miwok seasonal gathering areas; hunting styles and transition to current ranching and ideal sustainable ranching in education film at Visitor Center. cultural transition to s current ranch activity demonstration in the Visitor Center as an adjunct to the Morgan Horse focus.

Use this cultural designation to continue in perpetuity a natural flow of ranch produced dairy products and services to meet and augment community needs.

Include in the visitor center visual documentation and orientation to surrounding Marin Agricultural Land Trust (MALT) farming and sustainable such as methane conversion energy;; fertilizer from manure, native plant uses Point Reyes National Sea Shore mapping ° Consider these as a whole to be historic by Native American and early settlers,

Provide sequential twenty year leases..

Upgrade as property owners, Golden Gate Recreational Area (GGNRA) shall provide funds for maintenance and upgrading facilities while restoring and keeping ranch landscape.

Resolve elk containment by natural barriers- (e.g.) *ha ha* of English Capability Brown's landscape, electric fencing within traditional drift wood early fencing mode and herd size monitoring using acceptable fertility mitigation methods or transfer of elk to other formerly native habitats in National forests, monuments or parks.

Maintain the road to the light house; try to continue special road surfacing where exists by importing oyster shells from Tomales Bay commercial oyster harvesting and include traffic reduction to adverse impact by van shuttles from the Visitor Center

DOCUMENT THAT RANCHING AND NATURAL ENVIRONMENTAL FISH, FIN FUR ARE ACCEPTABLE COMPONENTS: IN FUND CONSTRAINED INTERNATIONAL PARKS:

Cultural resources are nonrenewable that adversely may not be restored by narrative and visually, sustainable recovery methods are already begun by park staff.

The International Union of Conservation and Natural Resources (IUCN), in order to world-wide best protect and manage significant historical, cultural or especial ecosystems identifies and defines them under six categories. Categories IB and VI are relevant to the discussion today and the decision of an EPR for the Point Reyes National Seashore's cattle ranches that have been operated by the same families since the 1860s.

IB Wilderness Area: Large protected area of land or sea managed mainly for wilderness protection and without permanent or significant habitation.

VI Managed Resource protected Area: a protected area managed mainly for the sustainable use of natural resource systems. An area containing predominate unmodified natural systems, managed to ensure long-time protection and maintenance of biological diversity, while at the same time providing a sustainable flow of natural products and services to meet community needs.

IB would not include as wilderness area the significant historic family ranches or small scale dairy farms The NPS recognizes and cooperates through studies and support for this long time maintenance of land use and visual scapes of the ranches and adjacent wild life. When subdivisions on the Point Reyes Peninsula in the 1950s threatened these historic ranches and views, families formed an alliance with the Sierra Club and other environmental groups to establish the park in 1962 that would include their ranches, vistas and habitat.

VI includes the currently National Park Service (NPS) recently avowed plan to renew for another 20 years the culturally historic, small scale ranch leases on Point Reyes National Seashore. The ranchers rightly view their family operations as an integral part of early California's west coastal history and their viable preservation of land use and adjacent habitats. Is a vial component of integrated parks. The ascertained historic Drakes Landing and the culturally historic ranch component of the Golden Gate National Recreation Area Drakes Landing sold be verified and A grading and paving business, any semi-industrial, construction, future mining or consolidated large conglomerate agricultural or dairy businesses or housing developments are not viable under VI. Any impact for a change from ranch comprehensive management within the larger visitor recreational area mandate, whether pre-existing or considered in the future, shall not be permitted. within these public recreational / park lands

Sincerely

Margaret Kettunen Zegart

POINT REYES NS
2017 NOV 28 AM 4:00
RECEIVED



RECEIVED

WESTERN UNITED DAIRYMEN

2017 NOV 29 AM 6:39

POINT REYES NS

Rec'd 11/22/17 at Bear Vly
November 20, 2017
Visitor
Center.
CK

Cynthia MacLeod
Acting Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Dear Superintendent MacLeod,

Western United Dairymen (WUD), the largest Dairy Trade Association in California, appreciates the opportunity to provide input on the General Management Plan (GMP) amendment process for the Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGNRA). WUD represents 650 member-dairies throughout California, including all six dairies located within the PRNS. Western United Dairymen is an organization which works to promote sound legislative and administrative policies and programs for the profitability of the dairy industry and the welfare of consumers by striving always to develop concepts for the general welfare and longevity of dairy producers, while maintaining the strong, positive public image of our dairy families.

WUD has followed the initiation of the GMP process and reviewed the alternatives proposed by the NPS. Our comments reflect careful consideration of those alternatives and their potential impact on the PRNS, the local community and the dairymen operating within the Park. Our comments will specifically address: Alternatives set forth by the Settlement Agreement and the NPS, issuance of long-term leases for ranchers and dairymen, and active management of the Drake's Beach and Limantour-Estero Road Tule Elk Herds.

1. Alternatives

Following the Settlement Agreement resulting from the lawsuit *Resource Renewal Institute v. National Park Service* the three alternatives that were identified proved disappointing. We appreciate the hard work the NPS has done to include three additional alternatives in their GMP notice, and offer the following comments for consideration of those alternatives.

First, the "No Ranching," "No Dairy Ranching," and "Reduced Ranching" alternatives proposed by the Settlement Agreement are not only contrary to the Point Reyes National

Seashore Enabling Act, but detrimental to the local community. With nearly 20% of Marin County's agricultural production happening within the PRNS eliminating or reducing the farming activity has the potential to eliminate 65 jobs and the livelihoods of 25 ranching families. The resulting impact of this "phase out" would affect local schools, businesses, and tax revenues, not to mention the loss of one of the area's most historic and important cultural resources. Ranching and dairy farming are a fundamental aspect of life on the Point Reyes Peninsula; alternatives that eliminate or reduce these historic ranches promise to significantly alter the culture and sustainability of the Park and the community at large.

After careful consideration and discussion with our member-dairies Western United Dairymen supports the "Continued Ranching" alternative. We praise the effort of NPS to include the provision of 20-year leases and management of Elk in this alternative, and offer further comment on those provisions below.

2. Leases

WUD firmly believes that the adopted GMP amendment should ensure long-term leases for farmers and ranchers located within the PRNS. WUD appreciates that under our preferred alternative, the "*Continued ranching*" proposal, "existing ranch families would be authorized to continue beef cattle and dairy ranching operations under agricultural lease/permits with 20-year terms." Additionally, we support the idea that those permits will "identify authorized measures for operational flexibility and diversification."

Providing operational security *and* flexibility to the dairymen operating within the PRNS will ensure their continued stewardship of these important lands. With the promise of longer-term leases these pasture-based, organic dairies will be better positioned to secure outside funding and more likely to invest personal capital in opportunities that would aid in addressing existing environmental concerns and improve already present on-farm best management practices; benefitting water, soil, air and wildlife in the Park and the Point Reyes community.

In conjunction with the issuance of long-term leases WUD encourages NPS to explore the options surrounding succession of these valued ranch lands. Developing two paths for succession:

- 1) a plan for current ranching and dairy families to continue operations, and
- 2) the opportunity for interested parties to inherit management of those lands should existing families be unable to continue

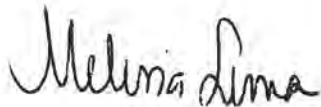
These options would foster the overarching goal that this important tradition continue on the Seashore.

3. Elk Management

WUD asks, in accordance with the wishes of our dairy producers, for an expansion of the "Continued Ranching" alternative to include the removal of the Drake's Beach and Limantour-Estero Road Elk herds from the pastoral zone per the 1998 NPS Elk Management Plan. The ranching community is supportive of the continuation of the Elk Herd both within the Park's wilderness zone and outside of the PRNS, a management move which would allow the Elk population to thrive while reducing the ongoing damage to livestock, infrastructure and forage land.

Western United Dairymen thanks you for the opportunity to provide comments on this initial step in the GMP amendment process. We're very proud to represent the six dairies of the PRNS. On behalf of our dairies we look forward to working in partnership with the National Park Service in subsequent steps to completing the GMP amendment. Please don't hesitate to reach out if we can provide further support in the matter.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Lema".

Melissa Lema, North Coast Field Rep
Western United Dairymen