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**CD 0006-20 (National Park Service)**

**December 18, 2021**

**CORRESPONDENCE**

**(received as of December 18, 2021)**

**PART 3**

**PAGES 434 - 656**

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December 7, 2020

VIA EMAIL

California Coastal Commission  
455 Market Street, Suite 300,  
San Francisco, CA 94105

Re: Agenda Item CD-0006-20 (NPS, Point Reyes GMPA); Coastal Consistency  
Determination for the Point Reyes National Seashore and North District Golden  
Gate National Recreation Area General Management Plan Amendment and  
Environmental Impact Statement

Dear Commission Members:

**I. INTRODUCTION.**

I am very concerned about the water quality problems that exist in Point Reyes National Seashore (PORE) and Gate National Recreation Area (GOGA) with respect to Agenda Item CD-0006-20. These problems existed when the National Park Service (NPS) acquired the lands for these two national park units and there has never been any significant improvement. Conditions today are completely unacceptable for coastal watersheds, especially for coastal watersheds in units of the national park system. The Commission should object to what the Park Service plans to do to these parks.<sup>1</sup>

I am a retired attorney and starting in 2010 I have spent about two days each month photographing wildlife in the ranching area of PORE. Before my retirement I was an Assistant U.S. Attorney in the Northern District of California (San Francisco) where I handled environmental and natural resources cases for the United States. The most common case I would handle would involve NEPA. I started my career as an attorney in the Department of the Interior in Washington, D.C. and later transferred to its legal office in San Francisco. In San Francisco I handled mostly Park Service matters. One of the first matters I recall handling was a suit filed by a PORE rancher in 1978 to stop the reintroduction of the tule elk into PORE. The suit was dismissed.

**II. DISCUSSION.**

CD-0006-20 will violate the following sections of the Coastal Management Program:

<sup>1</sup> Seashores and recreation areas are to be managed to the same standards as national parks. NPS Organic Act, 54 U.S.C. § 100101. Bicycle Trails Council of Marin v. Babbitt, 82 F.3d 1445, 1451-1454, (9th Cir. 1996).

### **Section 30230 Marine resources; maintenance**

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

(Emphasis added.)

### **Section 30231 Biological productivity; water quality**

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

(Emphasis added.)

The Legislature also made certain findings regarding the coastal management program.

In section 30001 it found that the coastal zone is a valuable natural resource, that permanent protection of the state's natural resources is of paramount concern and that "it is necessary to protect the ecological balance of the coastal zone and prevent its deterioration and destruction." Further, in section 30001.5 it found that one of the goals of the state for the coastal zone is to "[p]rotect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources."

In its CD, the Park Service basically says "trust us." Things are going to get better for water quality because (1) the Park Service is going to institute a zoning system for ranching that will better protect water resources in the two parks and (2) it is going to establish "a suite of resource protection and restoration management measures that would . . . further reduce pollutant discharges from the ranched lands." Page 27.

As described in its EIS/GMPA, new, more intensive, practices, such as diversification, which involves raising additional species of domestic animals (sheep, goats, pigs, horses and 500 chickens per ranch), row crops on up to 2.5 acres, processing and sale of farm products, including meat (slaughtering farm animals on site), farm tours and farm stays. These more intensive activities will be limited to 35% of each ranch (34% of pastureland and 1% on ranch core land) and the remaining 65% of the land will only be grazed, as in the past. This is not an improvement over the status quo, but the reverse. Now, all the land is

limited to grazing. The preferred alternative will provide for further commercialization and impacts to resources on 35% or each ranch that doesn't exist now. Calling this zoning approach good is only good if you are a rancher who wants to use federal parkland more intensively.

Furthermore, the CD talks about a "suite of resource protection and restoration management measures . . . to further reduce pollutant discharge from the ranch lands" and refers the reader to Appendices A and F of the Appendix. Appendix A is a map showing over 100 construction projects to be built on the ranch lands. They take the form of new buildings, fences, infrastructure improvements, dozens more new livestock water supplies, manure management, road decommissioning and upgrading, pond restorations, stream crossings and waterway stabilizations. Appendix F is a list of construction projects to be done and a reference to the Department of Agriculture's Natural Resource Conservation Service standards for that type of construction project. The Park Service is talking about a tremendous amount of construction activity to use the two parks more intensively to benefit private ranching businesses. The Park Service is basically stating that it will use best management practices (BMPs) for new construction projects. BMPs are not new between the Park Service and the ranchers and they won't work any better now than before.

Another problem with this approach is that by adopting standards from the USDA's NRCS, the Park Service is basically delegating away its statutory responsibilities for administering the lands and other resources of the two parks. These standards were developed for private farms and ranches. National park units are, by law, to be managed to higher standards.

National Park Service laws have protective language similar to the California Coastal Act. Ranching may only be allowed in these two parks "[w]here appropriate in the discretion of the Secretary." 16 U.S.C. § 459c-5 and 16 U.S.C. § 460bb-2.

The Secretary's discretion is curtailed by language in the 1916 NPS Organic Act which requires the Secretary to manage all units of the national park system, including seashores and recreation areas, to "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. (Emphasis added.)

This law requires the Secretary to conserve the resources and not do anything that would impair them. Ranching is impairing them with respect to all resources, not just water.

PORE and GOGA have similar laws. For example, the PORE law provides that the Secretary shall manage the Seashore "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 area . . ." 16 U.S.C. § 459c-6. (Emphasis added.)

Similar to the Organic Act, the Point Reyes law requires the Secretary to manage the Seashore “without impairment of its natural values” and for “the maximum protection, restoration, and preservation of the natural environment.”

In all three of these laws, protection of resources trumps any human use. The objective of these laws is to protect and preserve these lands and waters in their natural condition; that is, the condition they were in before the arrival of European man, and to restore them to their natural condition if they have been altered by man.

Another problem with the CD is that it is supposed to include “a detailed description of the activity, its associated facilities, and their coastal effects, and comprehensive data and information sufficient to support the Federal agency’s consistency statement.” 15 C.F.R. § 930.39(a). The CD provides no data to support the Park Service’s consistency statement with respect water. The only data that exists shows just the opposite, that the waters (and other resources) in these ranching areas have been severely damaged and restoring them to their original condition will be a Herculean task.

## A. THE 2019 GMPA DRAFT ENVIRONMENTAL IMPACT STATEMENT

NPS’s DEIS was commented on by over 7,600 people. More than 91% were against continued ranching.<sup>2</sup> Among those that commented was the San Francisco Regional Water Quality Control Board (SFRWQCB) whose comments follow this excerpt from the DEIS. The DEIS provides in pertinent part as follows:

### Surface Water

Surface water resources in the planning area include perennial and intermittent streams, natural lakes and ponds, human-made impoundments including stock ponds, and various wetlands including tidal estuaries and sag ponds. Overall, there are 54.7 miles of streams, 84.1 acres of ponds, and 1,970 acres of wetlands in the planning area (NPS 2016a) . . . The watersheds in the planning area include Tomales Bay (including sub-watersheds Lagunitas Creek and Olema Creek), Kehoe Drainage, Abbotts Lagoon, Drakes Estero, Drakes Bay, and Coastal (Pacific Ocean) Drainages (figure 43 in appendix A)

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### Surface Water Quality

The main sources of water quality degradation in the planning area are **potentially pathogenic bacteria** and **nutrient loading** from nonpoint sources associated with ranches, dairies, septic systems, and stormwater

<sup>2</sup> Only 179 responders were in favor of ranching. Most of the rest expressed “unrelated concerns” (mostly bicyclists who favored more bicycle trails, which was not an alternative).  
<https://www.sfchronicle.com/environment/article/At-Point-Reyes-the-contest-is-elk-vs-15203706.php>

runoff (NPS 2013a; Pawley and Lay 2013).<sup>3</sup> **Sediment loading** from erosion and degradation associated with natural processes, ranch and dairy activities, land development and disturbance, stream channel alteration, and stormwater runoff also affect many of the surface waters. **Nutrients, pathogens, and contaminants** are often bound to suspended or settled sediment particles in rivers, streams, or lakes and could constitute additional pollutant sources (Pachepsky and Shelton 2011; Thompson and Goynes 2012; Walling, Wells, and Russell 1997). Additionally, current and past land uses, including historical logging, agriculture and livestock activities, road construction, and stream channel modification, have led to the loss of pollutant and stormwater attenuation capacity, altered drainage patterns, and increased sediment inputs to water resources (NPS 2001a).

Section 303(d) of the Clean Water Act authorizes USEPA to assist states, territories, and authorized tribes in listing impaired water and developing total maximum daily loads (TMDLs) for these waterbodies. A TMDL establishes the maximum amount of a pollutant allowed in a waterbody and serves as the starting point or planning tool for restoring water quality. The San Francisco RWQCB administers waste discharge requirements for point and nonpoint sources of pollutants to achieve narrative and numerical water quality objectives (San Francisco RWQCB 2013). Only half of the freshwater quality parameters (e.g., **bacteria, pH, and dissolved oxygen**) have established objectives put in place by San Francisco RWQCB or USEPA; other parameters (**temperature, specific conductance, turbidity, and nitrate**) do not have established water quality objectives but can be compared to ecological objectives drawn from scientific literature (Wallitner and Pincetich 2017).

Grazing and dairy operations in the planning area can receive a waiver of waste discharge requirements instead of meeting numeric constituent targets established either by TMDLs in the planning area or by the RWQCB's Basin Plans. A Conditional Waiver of Waste Discharge Requirements for Existing Dairies can be granted for eligible dairy operations if operators are in compliance with the Statewide Minimum Standards for Discharges of Animal Wastes (Title 27, California Code of Regulations). All dairies operating in the planning area fall under the conditional waiver,<sup>4</sup> which was renewed in 2015 and expires in 2020. A General Waste Discharge Requirements Waiver was

<sup>3</sup> Pawley and Lay are the authors of NPS's 2013 "Coastal Watershed Assessment for Golden Gate National Recreation Area and Point Reyes National Seashore" which is the most thorough study of the waters of PORE and GOGA ever done. It will be covered below.

<sup>4</sup> Based on the harm to water quality evidenced in the following pages, I find it hard to believe the PRNS ranches meet the Statewide Minimum Standards for Discharges of Animal Wastes, assuming those standards are designed to significantly reduce, if not eliminate, adverse water quality impacts.

adopted in 2016, and dairies will be required to enroll under this general waiver after the current conditional waiver expires.

### The Principal Watersheds

**Tomales Bay Watershed.** In total, the Tomales Bay watershed encompasses almost 140,800 acres. Tomales Bay itself is an approximately 12-mile-long flooded valley, covering 6,912 acres, straddling the San Andreas Fault. Most of the freshwater delivered to Tomales Bay originates in two major subwatersheds: Lagunitas Creek and Walker Creek . . .

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The San Francisco RWQCB listed Tomales Bay, and major Tomales Bay tributaries, including Lagunitas Creek and Olema Creek,<sup>5</sup> as impaired for **nutrients, pathogens, and sedimentation/siltation** under section 303(d) of the Clean Water Act (SWRCB 2010). Sources of **nutrients** and **potentially pathogenic bacteria** include animal waste, human waste from failing septic or treatment systems, boat discharges, fertilizers, and decomposing organic material (SWRCB 2013). Sources for elevated concentrations of total suspended solids include soil disturbance associated with the San Andreas Fault zone, historical logging activities, and historical and current agricultural practices.

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Recent monitoring studies in Tomales Bay, Lagunitas Creek, and Olema Creek have observed exceedances of San Francisco RWQCB **potentially pathogenic bacteria** criteria and **elevated nutrient, suspended solids, and turbidity levels** in the watershed especially associated with stormwater runoff following high-intensity storm events (Crunkilton 2000, as cited in NPS 2013a; NPS 2004a; NPS 2017a; SWRCB 2013; Wallitner 2016). Monitoring data from the 2005 Tomales Bay TMDL staff report showed that watersheds in the planning area, Lagunitas and Olema Creek, contributed some of the lowest **fecal coliform bacteria** loads to the bay . . .

<sup>5</sup> Lagunitas Creek, Olema Creek and Pine Gulch Creek exist in whole or in part in the ranching areas of the two parks and contain endangered coho salmon. <https://irma.nps.gov/DataStore/DownloadFile/153623> Those streams and many, many others in the ranching areas of the two parks also contain threatened steelhead. See <http://npshistory.com/publications/pore/nrr-2019-1895.pdf>, Appendix D, for a discussion of 18 streams in PORE and 21 streams in GOGA with steelhead.

From 2013 to 2014, approximately 7% of the **fecal coliform bacteria** samples recorded in the Lagunitas Creek watershed exceeded the single sample contact recreation objective. Many of these exceedances occurred during the dry season at the Lagunitas Creek/Tomales Bay interface (Wallitner 2016). **Turbidity** and **nitrate** as **nitrogen** levels decreased from upstream/upper sites to downstream/lower sites for both Lagunitas Creek and Tomales Bay (SWRCB 2013; NPS 2013a; NPS 2016a; NPS 2017a). In Lagunitas Creek, the overall turbidity objective of the Lagunitas Creek Sediment TMDL is being met, but the narrative objectives for **sediment** and **settleable and suspended materials** are not (San Francisco RWQCB 2014).

Long-term trend analysis in the Olema Creek watershed indicates **fecal coliform bacteria** concentrations have decreased over time (1999 to 2017; Voeller et al. 2018). Although the general, long-term **fecal coliform bacteria** trend was downward, increases in precipitation during that period resulted in increases in **potentially pathogenic bacteria** concentrations with increases in cumulative 24-hour and five-day precipitation. Short-term watershed assessment monitoring (January 2016 to May 2018) showed spatial and temporal changes by season (i.e., storm, winter baseflow, or summer baseflow). For all sample periods, an increase in **fecal coliform bacteria** and **E. coli** concentrations was observed moving from upstream to downstream. The highest concentrations were recorded during storm periods, whereas the lowest concentrations were observed during the winter baseflow period. This spatial trend was harder to observe in **turbidity** samples from Olema Creek, which had high individual levels during storms but relatively few samples exceeding the NPS screening criteria of 50 nephelometric turbidity units (NPS 2013a; NPS 2016a; NPS 2017a). Overall, the long-term decrease in **fecal coliform bacteria** concentrations from 1999 to 2017 parallels the greater effort toward implementation of conservation practices such as livestock water supply and installation of fencing intended to reduce pathogen, sediment, and nutrient loading to local streams throughout the watershed (Voeller et al. 2018).<sup>6</sup>

Monitoring on Lagunitas and Olema Creeks generally produced low **nitrate** values, with the most upstream site having the lowest values and the highest values at a downstream site (SWRCB 2013). Other than several high values recorded in inner Tomales Bay and Olema Creek, most **nitrate** samples were below the 0.30 milligram/liter ecological threshold established by L. M. Roche (Roche et al. 2013) for limiting eutrophication of streams (NPS 2013a; NPS 2016a; NPS 2017a; SWRCB 2013). Most of the samples with the highest

<sup>6</sup> Dylan Voeller is in charge of the ranching/grazing program for PORE (including the northernmost 10,000 acre ranching area of GOGA).



individual **nitrate** values for Olema Creek were collected during storm events (NPS 2017a).

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**Drakes Bay and Drakes Estero<sup>7</sup> Watersheds.** NPS programs and other sampling efforts have observed high concentrations of **total suspended solids** and **nutrients** in Drakes Bay and Drakes Estero watersheds (NPS 2004a; Pawley and Lay 2013). Surrounding land uses such as ranches and pastures for dairies and other livestock operations contribute nutrients and **sediment** to Drakes Bay and Drakes Estero (NPS 2004a). Occasionally high **potentially pathogenic bacteria** counts have been observed in some drainages (Pawley and Lay 2013). **Potentially pathogenic bacteria** pollutant sources in these watersheds include stormwater runoff from pasture and grazing land, sewage systems, wildlife, and boat discharges in the tidal and marine environment (outside the planning area) (CDPH 2011). Drakes Estero was previously proposed for listing because of high levels of **potentially pathogenic bacteria**, but the listing was based on the previous use for shellfish production, which ceased in early 2014 (San Francisco RWQCB 2017).

**Kehoe Drainage, Abbotts Lagoon,<sup>8</sup> Coastal Drainages.** In 1999–2000, USGS conducted a water quality assessment of the Abbotts Lagoon watershed. The study determined that tributaries draining dairy operations or dairy grazing land had **the highest nutrient levels or loading rates** especially following storm events (USGS 2005). Data collection in Kehoe Creek has shown elevated levels of contaminants including **nutrients** and **sediment** (NPS 2004a; Pawley and Lay 2013). Stormwater runoff from nearby dairy operations and pasture land into Kehoe Creek is contributing to these high levels. High **potentially pathogenic bacteria** counts have also been observed in Kehoe Creek and Abbotts Lagoon, and many samples exceeded the **potentially pathogenic bacteria** standard (Coopridge 2004; Pawley and Lay 2013). Many of these exceedances occurred near dairy operations. To address these water quality concerns, several conservation practices and infrastructure improvements have been implemented, including installation of a new loafing barn at I Ranch dairy in 2004.

<sup>7</sup> Steelhead, a threatened species, use Drakes Estero. They have been observed in a least two creeks draining into the estero, namely Home Ranch Creek and East Schooner Creek. <http://npshistory.com/publications/pore/nrr-2019-1895.pdf> at 294. Steelhead once used Schooner Creek, but, unfortunately, they apparently no longer do. *Ibid.* Continued ranching may eliminate them from Home Ranch Creek and East Schooner Creek as well.

<sup>8</sup> Abbotts Lagoon is fed, in whole or in part, by Abbotts Creek. Abbotts Creek is an anadromous creek used by steelhead. <http://npshistory.com/publications/pore/nrr-2019-1895.pdf> at 295. Located in the Central California Coast, this distinct population segment in PORE and GOGA is listed as threatened under the Endangered Species Act.

additions and improvements to the loafing barn facilities at J Ranch dairy, and installation of exclusion fencing to create buffers along drainages.

The installation of the loafing barn at I Ranch allowed for the closure of a 40+ acre high-use impact area that was subject to runoff during the winter months.

DEIS at 66-71. [https://www.nps.gov/pore/getinvolved/planning\\_gmp\\_amendment\\_deis.htm](https://www.nps.gov/pore/getinvolved/planning_gmp_amendment_deis.htm) (Emphasis and bolding added.)

With respect to the last two sentences in the DEIS, the I Ranch loafing barn was built in 2004, but the Pawley and Lay report (i.e., The Coastal Watershed Assessment), cited above as evidence of most of the pollution in Kehoe Creek, was written in 2013. There has been no improvement. There is no mention of the fact that two other ranches, the K and L Ranches, drain into Kehoe Creek and are polluting it today. Finally, no date is given for the improvements to the old J Ranch loafing barn, but Kehoe Pond and Lagoon are totally covered in vegetation today as are the creek itself and most of the stock ponds that drain into it. Later in this letter I will show photos evidencing the condition of the creek today. It is obvious, as the photos show, that manure, with all its nutrients, is still getting into Kehoe Creek.

The DEIS admits that Lagunitas Creek and Olema Creek, each cold-water, anadromous creeks, are being polluted by ranching operations. It further admits that Drakes Bay/Estero and Kehoe Drainage, Abbott's Lagoon and the coastal drainages are even more polluted by ranching operations. With the exception of Lagunitas Creek, all of these watersheds begin and end on NPS land and thus NPS has complete control over their water quality.

In short, while section 30231 of the Coastal Management Program states that the "biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored," that is not happening.

Given what the DEIS discloses, it is hard to believe the Park Service's claim that "the Preferred Alternative is maximally consistent with Sections 30230-30231 of the California Coastal Act." Believing that gets even harder below.

## **B. THE WATER BOARD'S COMMENTS ON THE PREFERRED ALTERNATIVE.**

The San Francisco Regional Water Quality Control Board (SFRWQCB) commented as follows on the Draft EIS:

The Water Board listed Tomales Bay, and major Tomales Bay tributaries, including Lagunitas Creek and Olema Creek, as impaired for **nutrients, pathogens, and sedimentation/siltation** under section 303(d) of the Clean

Water Act (SWRCB 2010). The proposed diversification and increased public use facilities (trails, picnic areas, and housing with associated restrooms and septic systems) could potentially increase discharges of **sediment, pathogens, nutrients, and pesticides**. Further, these activities may alter watershed hydrology (surface water and groundwater flows) and degrade wetland, riparian and stream integrity and function. Increases in the discharge of **pollutants** above existing baseline levels and loss of habitat critical to beneficial use function would violate State Antidegradation Policy (State Water Resources Control Board Resolution No. 68-16).

(Emphasis and bolding added.)

The Board's DEIS comment letter goes on as follows:

The Draft EIS, however, does not adequately identify all potential adverse water quality impacts for the proposed land-use changes, including diversification in the Range (goats, sheep, chickens) and Ranch Core Subzones (pigs, sheep, goats, chicken), row crops in the Ranch Core Subzone, and increased public use facilities. Further, the draft EIS "does not adequately incorporate mitigations for these impacts. The most significant of these impacts may occur in the Ranch Core Subzone.

Through our confined animal facility (CAF), grazing, and grants programs, we have worked closely with NPS to improve rangeland and dairy operations and management. All the actions identified as "high priority" in the NPS rangeland assessment have been implemented. As demonstrated through ongoing water quality monitoring (draft EIS pages 68-69), these efforts have resulted in significant water quality improvements. However, additional improvements are needed because water quality standards exceedances still occur. With NPS, we will evaluate recent data to determine what additional actions are needed to resolve existing water quality standard exceedances. We are concerned that many of the proposed Ranch Core Subzone diversification activities will lead to new exceedances which cannot easily be remediated due to technical or financial feasibility.

[https://www.nps.gov/pore/getinvolved/upload/planning\\_gmp\\_amendment\\_deis\\_public\\_comments\\_5027-7624\\_200302.pdf](https://www.nps.gov/pore/getinvolved/upload/planning_gmp_amendment_deis_public_comments_5027-7624_200302.pdf) Comment number 7018. (Emphasis added.)

The Board's letter states that water quality standards are being exceeded now and the Board is concerned that "many of the proposed Ranch Core Subzone diversification activities will lead to new exceedances which cannot easily be remediated due to technical or financial feasibility." Again, it does not seem possible to reconcile the ongoing pollution plus the likelihood of even greater pollution with the statement that "the Preferred Alternative is maximally consistent with Sections 30230-30231 of the California Coastal Act." Believing that gets even harder below.

### C. NPS'S OWN SCIENTIFIC ASSESSMENT OF WATER QUALITY IN THE PARKS.

By far the most thorough assessment of the waters of PORE and GOGA is the 259-page “Coastal Watershed Assessment for Golden Gate National Recreation Area and Point Reyes National Seashore” published in 2013. It was produced by the Park Service’s Natural Resource Stewardship and Science Office in Fort Collins, Colorado. Here is a link to it: <http://npshistory.com/publications/goga/nrr-2013-641.pdf> It is covered at length below.

Currently there are six operating dairies in PORE-managed lands. Extremely high fecal coliform concentrations have been documented in streams adjacent to existing dairy operations (Ketcham 2001 and see Water Quality chapter). Manure spreading areas are correlated with the increased presence of invasive and noxious weed species. Dairies and ranching are associated with other impacts to wetland and riparian process.

*Ibid*, at 41. (Emphasis added.)

The assessment goes on to state:

Internal sources of pollutants from recreational practices and land uses that were grandfathered in,<sup>9</sup> with the creation of PORE and GOGA, continue to be problems. PORE and northern GOGA contain numerous ranches, dairies and pasture lands, which contribute to water quality degradation, due to **excessive nutrient enrichment from feces and runoff**. Horse stables are also the source of **elevated nutrients** and **copper** (Coopridge 2004). Septic leach fields have been identified as nutrient sources in some areas (i.e., Lagunitas Creek in PORE and Redwood Creek in GOGA). Research by Stanford University at Stinson Beach adjacent to GOGA found that nearshore waters had nutrient signals from adjacent community septic systems that led to increased primary productivity (de Sieyes et al. 2008). Elevated concentrations of **nitrogen** and **phosphorus** can cause dramatic shifts in vegetation and macroinvertebrate communities, paving the way for non-native species invasions and reduced biodiversity. **Nitrogen-loading** in shallow estuarine embayments can lead to shifts in the dominant primary producers (e.g., macroalgae may replace eelgrass), which can lead to declines in **dissolved oxygen**, altered benthic community structure, altered fish and decapods communities and higher trophic responses (Bricker et al. 1999).

*Ibid*, at 62. (Emphasis added.)

<sup>9</sup> No sources of pollutants were “grandfathered in” by the legislation for the two parks. As clear from the quote at the beginning of this letter, ranching is discretionary. NPS could stop ranching today. It is one of the alternatives in the GMPA/EIS process. That ranching is supposed to go on forever is a falsehood perpetuated by the ranchers and NPS. Pawley and Lay accepted the false statement without questioning it.

Loss of native perennial vegetation, soil compaction and loss, gully and incision of swales and meadows have changed the runoff patterns and reduced the capacity of the watershed to attenuate pollutant loading and surface runoff to streams. Although land use activities have been greatly reduced and upgraded to more environmentally sustainable practices, current land use continues to influence water quality within many watersheds. Despite a general understanding of the stressors and evidence of impacts across the parks, a comprehensive assessment of stream health has not been performed. Some areas are being extensively surveyed and monitored due to proposed restoration, while for other areas, information is severely limited.

*Id.* at 103. (Emphasis added.)

The Coastal Watershed Assessment for PORE and GOGA went on to assess the various water quality parameters in both parks. As the assessment states:

The main management issues facing PORE and northern GOGA are related to balancing the historical and cultural traditions of ranching and dairy establishments with the very high water quality needed for endangered species such as coho salmon, steelhead trout, California freshwater shrimp and California red-legged frogs.

*Id.*, at 115. (Emphasis added.)

There is no need to balance ranching “with the very high water quality needed for endangered species such as coho salmon, steelhead trout, California freshwater shrimp and California red-legged frogs.” As shown previously, ranching is discretionary.<sup>10</sup> On the other hand, providing high water quality for these species is mandated by the NPS Organic Act, the two park statutes discussed above and, presumably, the Endangered Species Act.

The Coastal Watershed Assessment addresses the various parameters that assess water quality, namely conductivity, turbidity, dissolved oxygen, nitrogen (and related constituents), phosphorus (and related constituents) and pathogens (and related constituents).

### **Water Quality Parameters**

Conductivity/Specific Conductance. (pp. 136-139).

<sup>10</sup> Furthermore, the Park Service is legally required to protect natural resources above all other uses. 54 U.S.C. § 100101, 16 U.S.C. § 459c-6 and 16 U.S.C. § 460bb. The Ninth Circuit has held that “resource protection [is] the overarching concern” in the management of national park system units. Bicycle Trails Council of Marin v. Babbitt, 82 F.3d 1445, 1453 (9th Cir. 1996).

Conductivity/Specific Conductance Conductivity, the ability of a solution to pass an electric current, is an indicator of dissolved solids and can be influenced by the geology of an area as well as urban runoff. Ideally, streams should have conductivity between 150–500  $\mu\text{S}/\text{cm}$  to support diverse aquatic life (Behar 1997).

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**PORE:**<sup>11</sup> In PORE and northern GOGA, median specific conductance measured for 1,014 samples from 1999 to 2005 is 278  $\mu\text{S}/\text{cm}$  with an IQR from 181–370  $\mu\text{S}/\text{cm}$ . Figure 61 shows the specific conductance maxima at PORE monitoring locations and compares values to 850  $\mu\text{S}/\text{cm}$  and 1,700  $\mu\text{S}/\text{cm}$ . Values higher than 1,700, indicating **severe pollution**, occurred at dairy locations, including North Kehoe Creek (PAC2A), at the J Ranch [Kehoe] and K Ranch property line (PAC2B) [Evans], the L Ranch Impact Yard (PAC1B) [Mendoza], the A [Nunes] and B Ranches (DBY3, DBY2) [Mendoza] and the McClure’s [I Ranch] dairy swale (ABB3).

*Id.*, at 136-137. (Emphasis and bolding added.)

The significance of this statement is that the waters on five (A, B, I, J and L) of the six dairy farms (plus the K Ranch beef operation) at Point Reyes have been suffering from “**severe pollution**.” Three of these listed dairies plus the K Ranch (beef) drain into Kehoe Creek. (The J Ranch, K Ranch and, possibly, the L Ranch may drain into Tomales Bay as well). The assessment and other sources also discuss other areas of PORE and GOGA that are suffering serious pollution from ranching, including Abbott’s Lagoon, Drakes Bay, Tomales Bay and Olema Creek.

#### Turbidity/Total Suspended Solids (TSS) (pp. 139-141)

**Peak turbidity** and **TSS** are common during floods and during high winter flows. **TSS** can also come from algal and bacterial growth. Increased levels of **TSS** often indicate increased levels of particle-associated contaminants in depositional areas and can inhibit fish production. TSS was not consistently measured so this analysis is confined to **turbidity**. Turbidity, an indirect measure of **suspended solids** [TSS] is measured with a portable turbidity meter in Nephelometric Turbidity Units (NTU). SFRWQCB criteria levels for TSS objective are not to impair beneficial uses (CRWQCB 2007a). After 1999, the EPA came out with new guidance documents for nutrient criteria development (US EPA 2000a, 2000b), including **total nitrogen, total phosphorous, chlorophyll a and turbidity**. The **turbidity** criterion is 1.2 NTU, which is significantly more stringent than the criteria of 50 NTU used

<sup>11</sup> When the assessment refers to “PORE” it intends to include the 10,000 acres of ranching in GOGA that PORE manages for GOGA under a cooperative agreement.

to screen Legacy STORET data (NPS WRD 2003, 2005); however, because these are draft criteria, we used the WRD screening level in the analysis.

**PORE: High turbidity** was detected in Olema Creek (but there was only one measurement) prior to 1999 (NPS WRD 2003). A **turbidity** of 180 NTU was measured, which exceeded the WRD screening criteria of 50 NTU (NPS WRD 2003).

In PORE and northern GOGA, 64 **turbidity** measurements were made from 1999 2005 (Figure 63). The median is 3.82 NTU with an IQR from 0.77–24.03 NTU. The mean value was 68.82. Almost one-fourth of the measurements exceeded the WRD screening criteria of 50 NTU and over half the samples exceeded EPA guidance of 1.2 NTU for pristine conditions, indicating that high turbidity may be a problem in some locations. It should be emphasized that much of the sampling occurred during or immediately following storm events to capture the worst conditions. There are a paucity of measurements compared to other parameters, but some sites had extremely high turbidity measurements, including sites along the mainstem and tributaries of Olema. OLM 11 at Bear Valley Bridge exhibited the highest measurements (887 NTU), followed by South Kehoe (PAC1), Five Brooks (OLM14) and Lower Olema Creek (OLM10B). B Ranch (DBY2) and Creamery Creek (DES1) were also fairly high.

*Id.*, at 139-140. (Emphasis and bolding added.)

As the third paragraph points out: There is a paucity of measurements, but “some sites had **extremely high turbidity measurements**, including sites along the mainstem and tributaries of Olema. OLM 11 at Bear Valley Bridge exhibited the highest measurements (887 NTU), followed by South Kehoe (PAC1), Five Brooks (OLM14) and Lower Olema Creek (OLM10B). B Ranch (DBY2) and Creamery Creek (DES1) were also fairly high.”

This passage states that the beef ranches that drain into Olema Creek; all the dairies (I, J, L) and the one beef ranch, K Ranch, that drain into Kehoe Creek; and the B Ranch and any other dairies adjacent to it that drain into Creamery Bay; are causing “**extremely high turbidity**.”

Dissolved Oxygen (pp. 141-142).

The RWQCB objectives for **DO** in inland (fresh) waters are 7.0 mg/L (ppm) or above for cold water habitat and 5.0 mg/L (ppm) or above for warm water habitat (CRWQCB 2007a) . . .

PORE: An analysis of Legacy STORET data (397 observations from 62 stations) prior to 1999 indicated that less than 1% of the observations had **DO** levels below 4.0 mg/L (ppm) from 1959 through 1991 . . .

From 1999 to 2005, 968 measurements had a median value of 9.3 mg/L (ppm) and an IQR from 7.4–10.6 mg/L (ppm). Over 75% of the samples are in a comfortable range for aquatic life (>7.0 mg/L) (ppm) and 90% were >5 mg/L (ppm), the less stringent warm-water criterion. Figure 64 illustrates that a fairly significant number of samples fall below the optimum range. Extremely low DO conditions occur in the Kehoe/Abbotts watershed at PAC1 sites, Drake's Estero/Bay at A, B and C ranches (DBY1, 2 and 3), and in the tributaries draining to Drakes Estero. In the upper portion of the Olema watershed, primarily at ranch and horse stable sites, there were a significant number of exceedances. The map in Figure 65 illustrates the percent of samples that exceed standards for the cold and warm water DO objective for specific sites. Generally the percent of samples exceeding [not meeting] standards is lower than 50%, except for PAC1 and OLM18 [not meeting standards 51-83% of the time]; however, five cold water sites and two warm water sites had low DO levels for over a quarter [26-50%] of the measured samples.

*Id.*, at 141-142. (Emphasis and bolding added.)

Again, the dairies seem to be the main violators along with three beef ranches along Olema Creek. The A, B and C dairy ranches are specifically named in this paragraph with reference to Drakes Bay and Drakes Estero. The reference to “Kehoe/Abbott’s watershed” includes the I, J and L dairy ranches and the K beef ranch again, plus, possibly, the H Ranch (Abbott’s Lagoon). In summary, we have all six dairies and the K Ranch, and possibly the H Ranch (beef), plus ranches on the upper reaches of Olema Creek, a cold water, anadromous stream with coho salmon and steelhead in it creating “**extremely low DO** conditions.”

Nitrogen: Total Nitrogen, Ammonia, Nitrate, Nitrite (pp. 142-150)

Nitrogen is essential to biotic production and, in aquatic systems, exists in various forms – **nitrogen gas, nitrate (NO3-), nitrite (NO2-), reactive ammonia (NH4+), urea and dissolved organic compounds.** The primary anthropogenic sources of **nitrogen** are sewage, fertilizers and barnyard wastes.<sup>12</sup> Too much **nitrogen** leads to excessive algal blooms, low **dissolved oxygen** and ultimately fish kills. Sewage and barnyard wastes have **nitrogen** primarily as **ammonia**; fertilizer runoff has **nitrogen** primarily as **nitrate**. Even moderate environmental disturbances such as farming and logging release **nitrate** into solution (Goldman and Horne 1983).

<sup>12</sup> “Barnyard wastes” is a euphemism for animal waste/manure.  
<https://extension.wsu.edu/animalag/content/got-barnyard-runoff/>



**Nitrate** is very soluble and is flushed out of soils relatively quickly; **organic nitrogen** and **ammonia** are associated with particles and surface runoff. Storm events can result in high levels of **nitrogen compounds** in surface waters (Goldman and Horne 1983). **Nitrogen compounds** accumulate in depositional (sink) areas, such as ponds or lagoons. In high nitrate estuaries, a large part of the **nitrogen** load is removed by benthic denitrification, which reduces eutrophication. **Nitrous oxide (N<sub>2</sub>O),** a product of **denitrification,** is a major **greenhouse gas;** high nitrate estuaries may be an important source of **N<sub>2</sub>O** to the atmosphere (Robinson et al. 1998).

The drinking water standard is 10 mg of **nitrogen/L** (mg-N/L) for **nitrate** and 1 mg-N/L for **nitrite**, which is too high to be protective of many ecosystems (Stafford and Horne 2004). The US EPA developed guidance documents for **nutrient** criteria development (US EPA 2000a,b) including **total nitrogen, total phosphorous, chlorophyll a** and **turbidity**. US EPA's ecoregional **nutrient criteria** address cultural eutrophication – the adverse effects of excess **nutrient** inputs; however, there are insufficient data to apply the criteria for **total nitrogen**.

Efforts are underway to revise **nutrient criteria** in California based on specific habitat measures (Tetra Tech, Inc. 2006). The effort expands on the more traditional method that relies on measures of exposure alone (e.g., **nutrient concentration targets**); because the amount of **nutrients** that a water body can assimilate without impairment of uses varies widely, depending on a large number of cofactors. The theory is that the “intermediate measures” might be more easily generalized. For example, it may be possible to agree that a given **density of periphyton biomass** is injurious to coldwater fisheries, or a given frequency of blue-green algal blooms impacts a municipal supply use, even if the **nutrient** concentration that will cause that result varies widely from stream to stream (Tetra Tech, Inc. 2006). Impediments to the use of “intermediate measures” are that they are not routinely measured in park systems and they require models to predict **nutrient loads** appropriate without site-specific analysis.

After consultation with the sources above and several experts, we settled on an objective of 1 mg/L N as **nitrate** as an initial screening criterion and provide information on **nitrites** as background information. We also used the 10 mg-N/L level as an indication of **high nitrate contamination**. In many of the **nutrient samples**, over 75% of **nitrite** and **reactive ammonia**, fell below the limits of detection that led us to exclude these analyses.

In aquatic systems, **ammonia** is generally present in its **ionized or reactive form (NH<sub>4</sub><sup>+</sup>)**. A small fraction occurs in the **un-ionized form (NH<sub>3</sub>)**, which is toxic to aquatic species. Algal blooms lead to low **DO** levels and increases in **pH**, which increases **ammonia toxicity**. The US EPA's

criteria for **free ammonia toxicity** are presented in terms of **pH** and temperature for **total ammonia** and **un-ionized ammonia (NH<sub>3</sub>)** as 1-hr values and 4-day averages (i.e., not one number). The US EPA recommends that these levels should not be exceeded more than once in three years, which would enable a system to recover from the stress caused by **ammonia pollution**. The Basin Plan states that receiving waters should not exceed an annual median of **0.025 mg-N/L** or a **maximum of 0.16 mg-N/L** of **un-ionized ammonia** to protect the migratory corridor in the Central Bay and **0.4 mg-N/L** for the Lower San Francisco Bay (CRWQCB 2007a). This objective was used as a guide for evaluating possible lethal conditions.

PORE: **Nitrite concentrations** (including **total N**, dissolved and total as **NO<sub>2</sub>**) were measured 198 times at 40 monitoring stations from 1978 through 1998. Of the few exceedances noted, nearly all were located in GOGA near Easkoot Creek.

In PORE, **nitrite** was measured 148 times from 1999 to 2005; however, over 75% of the samples were below the detection limits of 0.01 mg/L. The samples above the detection limit were between 0.01–1.10 mg/L. The highest values were in the Pacific Coast watersheds in Kehoe Creek sites, PAC 1, PAC2, PAC2B and in the Drakes Estero watershed at sites near A and B Ranches, DBY2 and DBY3 below dairies. OLM 11 was somewhat elevated. Due to the paucity of results with values above the detection limit, we did not graph or map **nitrite exceedance**; the exceedance noted tends to mirror the exceedance noted for **nitrate**.

In PORE, **nitrate (as NO<sub>3</sub>-)** was measured 463 times from 1999 to 2005 with a median value of 0.52 mg/L, with an IQR from 0.2–1.4 mg/L. A majority of the samples fell well below 10 mg/L (Figure 68); however, several samples exceed this level (Table 26). Over 50% of the samples exceeded 1 mg/L (Figure 68), which is evidence of **nutrient enrichment** [fn. omitted]. The highest percentage of exceedances occurred in the Kehoe/Abbotts watershed, consistent with a previous analysis (Ketcham 2001). Samples at the L Ranch impact yard (PAC 1B) had two extremely high concentrations (400 and 600 mg/L N), indicating high levels of waste loading (Figures 68 and 69). These results are uncommonly high for PORE and are a result of the timing of the sampling event during high storm runoff conditions and the location of the monitoring station, which receives runoff from a densely populated field of grazing cattle. Between 1999 and 2005, over 34% of the samples were below the detection limits of 0.2 mg/L for **nitrate (as NO<sub>3</sub>-)**.

Table 26. Point Reyes National Seashore and northern Golden Gate National Recreation Area **sites with high levels of nitrate (>10 mg/L)**. These are not drinking water sites but areas with **high nitrate** levels.

Site*	Location Name	Watershed
PAC1A	McClure pond draining to S. Kehoe	Abbotts-Kehoe
PAC2	North Kehoe	Abbotts-Kehoe
PAC2A	North Kehoe Ranch (farm)	Abbotts-Kehoe
DBY3	A Ranch Perennial	Drakes Bay/Drakes Estero
ABB2	McClures Ranch	Abbotts-Kehoe
PAC1	South Kehoe	Abbotts-Kehoe
OLM5	Vedanta Creek	Olema
ABB3	McClures Dairy Swale	Abbotts-Kehoe

In PORE, **Ammonia** has been monitored as **reactive ammonia (NH<sub>4</sub><sup>+</sup>)** fairly consistently (N=390) and as **un-ionized ammonia (NH<sub>3</sub>)** sporadically (N=29) from 1999 to 2005. The scatter plots depict **reactive ammonia concentrations** (Figure 70) from 1999 to 2005. Over 80% of the samples tested for **reactive ammonia** were below the detection limits. For **reactive ammonia**, the median value was 0.2 mg-N/L with an IQR from 0.2–0.3 mg-N/L. Nearly 10% of the samples were above 0.6 mg-N/L. High measurements were found in Kehoe/Abbotts Lagoon, A and B Ranches. There are no agreed upon standards for reactive ammonium.

Almost 70% of the samples tested for **reactive ammonia (NH<sub>4</sub>)** from 1999 to 2005 were below the detection limits. Extremely high measurements were found in McClure (I Ranch) pond draining to S. Kehoe (PAC1A) and the McClure Dairy Swale (ABB3). Measurements above the toxic threshold and the Basin Plan objective of 0.16mg/L (un-ionized ammonia) were found in North and South Kehoe, the L Ranch impact yard and A and B Ranches in Drakes Bay. There were too few measurements to show exceedances. The Basin Plan states that receiving waters should not exceed an annual median of 0.025 mg-N/L or a maximum of 0.16 mg-N/L of **un-ionized ammonia** to protect the migratory corridor in the Central Bay, and 0.4 mg-N/L for the Lower San Francisco Bay (CRWQCB 2007a). The objective was used to evaluate possible lethal conditions.

*Id.*, at 142-148. (Emphasis and bolding added.)

In summary, with respect to **nitrites**, the highest values were in the Pacific Coast watersheds in Kehoe Creek sites, PAC 1, PAC2, PAC2B and in the Drakes Estero watershed at sites near A and B Ranches, DBY2 and DBY3 below dairies. OLM 11 was somewhat elevated. That implicates the I, J, L, A and B dairies and the K beef ranch. With respect to **nitrates**, over 50% of the samples exceeded 1 mg/L (Figure 68), which is evidence

of **nutrient enrichment** [fn. omitted]. The highest percentage of exceedances occurred in the Kehoe/Abbotts watershed (I, J, K, L and possibly H Ranch) and, consistent with a previous analysis (Ketcham 2001). Samples at the L Ranch impact yard (PAC 1B) had two extremely high concentrations (400 and 600 mg/L N), indicating high levels of waste loading (Figures 68 and 69). Kehoe/Abbotts measurements implicates the I, J, and L dairy ranches, the K beef ranch and, possibly, the H beef ranch. With respect to **reactive ammonia**, extremely high measurements were found in the McClure (I Ranch) pond draining to S. Kehoe (PAC1A) and the McClure Dairy Swale (ABB3). Measurements above the **toxic threshold** and the Basin Plan objective of 0.16mg/L (**un-ionized ammonia**) were found in North and South Kehoe (I, J, K and L Ranches), the L Ranch impact yard and A and B Ranches in Drakes Bay.

Phosphorus: Phosphate, Total Phosphorus, Orthophosphate (pp. 150-153)

Like **nitrogen**, **phosphorus (P)** is critical to biotic production; however, excessive levels lead to **algal blooms** and **low dissolved oxygen**. Sources of **phosphorus** include **soil sediments**, **fertilizer runoff**, animal wastes and detergents. In general most **phosphorus** is bound to sediment particles and ultimately delivered downstream and to the water bodies such as lagoons and estuaries.

Small oligotrophic stream biota may respond to **phosphorus** concentrations of 0.01 mg/L or less. In general concentrations greater than 0.05 mg-P/L (milligrams of **phosphorus** per liter) will have a detrimental impact, unless **nitrogen** is the limiting **nutrient** (Behar 1997). The US EPA **total P** reference value for Aggregate Ecoregion III rivers and streams is 0.02 mg-P/L, with a range of reference conditions from 0.01–0.05 mg-P/L (US EPA 2000c). For Aggregate Ecoregion III lakes and reservoirs, the reference value for **phosphorus** is 0.017 mg-P/L with a range of reference conditions from 0.003–0.172 mg-P/L (US EPA 2000e). In the parks, **phosphorus** is rarely a limiting **nutrient** so Stafford and Horne (2004) suggested eliminating it from a standard list of indicators. **Phosphorus** has not been consistently monitored; nor was it included as an indicator in the SFAN I&M vital signs assessment.

**PORE:** For pre-1999 conditions, **phosphorus** was not analyzed in the Horizon Report (NPS WRD 2003). From 1999 to 2005, **orthophosphorus** was measured 164 times with six results below the detection limit, a median value of 0.22 mg/L and an IQR of 0.13–0.47 mg/L. Our review of the data indicated a few extremely high values, particularly in the Kehoe/Abbotts watershed at PAC1 and PAC2 and the A and B Ranch areas in the Drakes Bay watershed (DBY2 and DBY3).

*Id.*, at 150-151. (Emphasis and bolding added.)

In summary, as for **orthophosphorus** the Kehoe Creek and Abbott's Lagoon watersheds and the Drakes Bay/Estero watersheds have had a few "extremely high values." The I, J, and L dairies and the K beef ranch and, possibly, the H beef Ranch are all in the first watershed. The A, B (and possibly C) dairies are in the second watershed and Home Ranch and N beef ranches may be as well.

Pathogens: Fecal Coliform Total Coliform and E. coli bacteria (pp. 153-156).

**Fecal contamination** can result from ineffective management of human wastes, such as leaking septic systems or untreated wastewater. **Fecal contamination** also comes from poor management of animal wastes, as well as manure from dairies and ranches. Low levels of **fecal contamination** also come from wildlife. US EPA numeric objectives for **indicator bacteria** are listed in Table 27. These objectives are set to be protective of public health and not intended to reflect ecosystem health, although high levels of waste can introduce **nitrogen** into the water causing **eutrophication**, which affects overall ecosystem health. In PORE, **fecal coliform** has been monitored and found useful in pollutant source tracking, since **nutrients** are so rapidly diluted in streams (Ketcham 2001). Because the samples are not evenly spaced during a 30-day period, we used the single sample objective to evaluate **total coliform** (10,000 MPN/100 mL) and **fecal coliform** (400 MPN/100 mL).

**PORE:** According to the WRD Baseline Inventory and Analysis Report for PORE (NPS WRD 2003) for pre-1999 conditions, the only stations with data exceeding the WRD **fecal indicator bacteria (i.e., fecal or total coliform or E. coli screening limits** for freshwater and marine water contact recreation) were Home Ranch Creek and East Schooner Creek; however, pre-1999 measurements were fairly limited. One station in the Kehoe watershed had the highest concentration (>24, 000 MPN/100 mL) and exceeded the contact recreation criteria for **total coliforms** (10,000 MPN/100 mL).

**Total coliform** was measured 962 times from 1999 to 2005 and depicted a median value of 1,700, with an IQR from 500–9,000 MPN/100 mL, indicating that more than 75% of the samples fell below the maximum water contact recreation criteria for **total coliforms** (10,000 MPN/100 mL). The scatter plot and map (Figure 75 and 76) indicates that there are a large number of exceedances in the Kehoe/Abbotts and Drakes Estero watersheds. Many sites in these watersheds exceeded the standard more that 50% of the time.

**Fecal coliform** was measured 923 times from 1999 to 2005 and had a median value of 800 MPN/100 mL and an IQR of 200–3,000 MPN/100 mL, indicating that over 50% of the samples exceeded the contact recreation criteria for **fecal coliform** (400 MPN/100 mL). The scatter plot and map (Figures 77 and 78) show the large number of exceedances in the

Kehoe/Abbotts and Drakes Estero watersheds; exceedances occurred in all watersheds, particularly near dairies.

*Id.*, at 153-155. (Emphasis and bolding added.)

With respect to pathogens, for **fecal coliform**, “over 50% of the samples exceeded the contact recreation criteria for **fecal coliform** (400 MPN/100 mL). The scatter plot and map (Figures 77 and 78) show the large number of exceedances in the Kehoe/Abbotts and Drakes Estero watersheds; exceedances occurred in all watersheds, particularly near dairies.” For **total coliform** “there are a large number of exceedances in the Kehoe/Abbotts and Drakes Estero watersheds. Many sites in these watersheds exceeded the standard more than 50% of the time.”

In summary, the Coastal Watershed Assessment makes an even stronger case than the DEIS and the SFRWQCB that ranching is having tremendous adverse impacts to water quality in the two parks. No lands and their waters should be in this bad of a condition, let alone those in units of the national park system.

In short, while section 30231 of the Coastal Management Program states that the “biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored,” that is clearly not happening.

Given what Pawley and Lay’s Coastal Watershed Assessment discloses, it is hard to believe the Park Service’s claim that “the Preferred Alternative is maximally consistent with Sections 30230-30231 of the California Coastal Act.” Is there another unit of the national park system that is as polluted as PORE and GOGA?

#### **D. APPENDIX L. NPS SAYS BMPS WILL GET IT CLOSER TO COMPLIANCE RE E. COLI.**

In the FEIS’s Appendix is document L, entitled “Improved water quality in coastal watersheds at Point Reyes National Seashore associated with rangeland best management practices, 2000 – 2013.”

[https://www.nps.gov/pore/getinvolved/planning\\_gmp\\_amendment\\_feis.htm](https://www.nps.gov/pore/getinvolved/planning_gmp_amendment_feis.htm)

It is dated July 7, 2020. It was not released until the FEIS was released on September 18, 2020, thereby precluding the public from commenting on it at the DEIS stage. (Public comments on the DEIS ended one year earlier on September 23, 2019.)

The authors are three employees of the Park Service at Point Reyes which raises a question of bias, especially since the lead author, Dylan Voeller, is in charge of the ranching program at PORE and GOGA.

The authors admit that livestock grazing and dairy operations can introduce pollutants to surface waters through runoff or direct access by animals to stream corridors. They further admit that agriculture is the main cause of stream impairments in the United States.

However, they state that best management practices (BMPs) can control pollution of streams and that between 2000 and 2013, the Park Service monitored water quality in the form of (1) fecal indicator bacteria (using its constituent, *E. coli*) and (2) turbidity in three coastal watersheds at Point Reyes National Seashore (Drakes Bay/Estero, Kehoe Creek and Abbotts Lagoon) and that during that time BMPs such as fencing, ranch infrastructure management, infrastructure for manure management, off-stream drinking water systems for cattle, and pond restoration were constructed or implemented on dairy and beef ranch operations to improve water quality.

They state that during that 2000 to 2013 period they investigated *E. coli* and turbidity and found that at 14 water quality stations representing three dairy and three beef cattle operations in three coastal watersheds that 30 targeted BMP practices were implemented to manage livestock, manure, and ranch infrastructure, with the goal of reducing impacts to surface water quality and that *e coli* went down where BMPs had been installed during those years.

They go on to state that:

FC [fecal coliform] data collected from 1999–2005 exceeded criteria in >50% of samples over all 3 watersheds, particularly near dairies (Pawley and Lay 2013), but subsequent data collected from 2006-2013 has not been analyzed until now.

Appendix L at 6.<sup>13</sup>

This raises some questions. Why wasn't the 2006-2013 data given to Pawley and Lay for their 2013 Coastal Watershed Assessment? The logical and honorable step for this GMP planning process would have been to give Pawley and Lay the 2006-2013 data to do a supplement to their 2013 study or at the very least ask them to peer review this paper. That would also have reduced any appearance of bias. Furthermore, why has no data been collected since 2013, especially given that the Park Service was beginning an important public planning process to decide whether ranching, which clearly has impacts on water and other natural resources, was appropriate for PORE and GGNRA?

The consistency regulations provide as follows regarding CDs and to what extent comprehensive data is required:

<sup>13</sup> Yet the authors later state, in a somewhat contradictory way, that: "Early BMPs targeting substantial sources of FIB [fecal indicator bacteria] appear to have had a large effect on improving water quality, with subsequent implementation contributing less (Lewis et al. 2005; Lewis et al. 2019)." *Ibid.* at 21. The early BMPs were in the 1999-2005 timeframe. See pages 8-9, *supra*, for a discussion of these BMPs.

The consistency determination shall also include a detailed description of the activity, its associated facilities, and their coastal effects, and comprehensive data and information sufficient to support the Federal agency's consistency statement. The amount of detail in the evaluation of the enforceable policies, activity description and supporting information shall be commensurate with the expected coastal effects of the activity.

15 C.F.R. § 930.39(a). (Emphasis added.)

Not collecting any data on water quality impacts since 2013 fails to comply with the above regulation. Furthermore, we don't know what the data was for other water quality parameters, such as nutrients and dissolved oxygen, from 2005 to 2013. We don't know what the water quality is today for any water quality parameter, so how can decisions be made for future ranching?

It's important to understand what Mr. Voeller and his two colleagues did and didn't cover in their report. There are 24 ranching families in PORE AND GOGA holding one or more leases each, and Appendix L only addresses six of the 24 ranches. Also, they only address two water quality parameters: (1) E. coli and (2) turbidity. They don't address the other water quality parameters Pawley and Lay addressed in their 2013 Coastal Watershed Assessment, namely (1) conductivity, (2) dissolved oxygen, (3) nitrogen and its constituent parts and (4) phosphorus and its constituent parts. So, no coverage of nutrients that cause algal blooms and eutrophication. Furthermore, they admit there was no change after their BMPs were installed with regard to turbidity. "Turbidity was only monitored consistently from 2010-2013, was generally below selected ecological thresholds at most stations, and did not show a trend over time." In other words, the BMPs did not show any improvements regarding turbidity. Yet, Pawley and Lay write in their Coastal Watershed Assessment that:

There are a paucity of measurements compared to other parameters, but some sites had **extremely high turbidity measurements**, including sites along the mainstem and tributaries of Olema, OLM 11 at Bear Valley Bridge exhibited the highest measurements (887 NTU), followed by South Kehoe (PAC1), Five Brooks (OLM14) and Lower Olema Creek (OLM10B), B Ranch (DBY2) and Creamery Creek (DES1) were also fairly high.

<http://npshistory.com/publications/goga/nrr-2013-641.pdf> at 140. (Emphasis and bolding added.)

That leaves what the authors have to say about E. coli at just six ranches. The authors state that the accepted number for E. coli is 320 CFU/100ml. Appendix L at 10. However, the number used by the SFRWQCB in the San Francisco Basin Plan is 235 CFU/100ml



which is based on EPA's number for water contact recreation.<sup>14</sup> But for our purposes here it doesn't matter. All but one of their stations had a median E. coli score above 320 CFU/100ml.

Let's look at each of the 14 water quality monitoring stations and see what that 1999-2013 data on page 9 of Appendix L shows. Again, the median number that is the limit is 320 CFU/100ml.

#### Abbotts Watershed.

ABB1. "Perennial stream mainstem just below tributaries on H Ranch. Flows through ungrazed area from L Ranch at top of watershed." (Emphasis added.) Median reading for E. coli is 710 CFU/100ml. That's more than double the 320 that's allowable. Highest reading is 40,000! That's 1,250 times more than what is allowable.

ABB2. "Tributary on I Ranch downstream of dairy corrals and ungrazed upstream wetlands and pond." (Emphasis added.) Median reading for E. coli is 1,900 CFU/100ml. That's about 6 times the 320 that is allowable. Highest reading is 192,000! That's 600 times what is allowable.

ABB3. "Tributary on I Ranch west just below former feeding corral prior to the installation of the loafing barn in the mid-2000s." Median reading for E. coli is 48,000 CFU/100ml. That's 150 times what is allowable. Highest reading is 1,666,000! That's over 5,000 times what is allowable.

ABB4. "Abbotts Lagoon at trail crossing bridge between lagoon chambers." Median reading for E. coli is only 13 CFU/100ml. That's much below what is allowable. Highest reading is 12,800. That's 40 times what is allowable. A reading of only 13 CFU/100ml is very good. Is there anything to explain that? Lets take a look at that station on Google Earth.

<sup>14</sup>[https://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/planningtmdls/basinplan/web/tab/tab\\_3-02.pdf](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/tab/tab_3-02.pdf)



Abbots Photo 1. The map depicts a portion of I Ranch lands (dairy) (roughly the top half of photo) and a portion of the H Ranch (beef) (roughly the bottom half of photo). ABB4, “Trail Crossing Bridge,” is marked where the lower chamber and middle chamber of Abbots Lagoon meet. The ABB4 station would give a far better reading of the amount of *E. coli* coming from the two ranches if it were placed in the small upper chamber where it says “More Relevant Station.” By the time any pollutants reach the current ABB4 station, the pollutants are almost completely diluted. Locating the ABB4 station in the upper chamber, which is largely covered by algae or some similar surface covering coming from the two ranches, would have given a much higher and more realistic reading of the pollution from the two ranches. Rather than a reading of 13 CFU/100ml, it would be in the thousands. Abbots Creek flows into the upper chamber and is a steelhead stream, at least so far.

#### Drakes Estero Watershed.

DES2. “East Schooner Creek mainstem at Estero Road crossing. Flows parallel to Sir Francis Drake Blvd. for its entire length. Limited grazed lands drained by small tributaries upstream to the north.” (Emphasis added.) East Schooner is a steelhead stream. Median reading for *E. coli* is 415 CFU/100ml. That’s more than the 320 that is allowable. Highest reading is 24,190. That’s more than 75 times what is allowable. Sir Francis Drake Blvd. was built alongside the creek. At times the creek overflows the road. In fact, for one stretch the road and the creek seem to occupy the same space. It is always flooded there. Road pollutants like oil and tire tread particulate matter enter the creek at

several spots.<sup>15</sup> The road is currently undergoing a large construction project. Hopefully, the new road will be better for the steelhead.

DES3. “Home Creek mainstem below Home Ranch buildings. Small grazed pastures and corrals.” (Emphasis added.) Median reading for E. coli is 480 CFU/100ml. That’s more than allowable. Highest reading is 12,800. That’s 40 times what is allowable. This is also a steelhead stream.

Drakes Estero is a large and very important estero (and so is Drakes Bay and its stations which the authors have left out). It is surprising and concerning that the Park Service shows only two stations for it, a water supply for cattle and a nearby fence both on Home Ranch which drains into Drakes Estero. Home Ranch Creek is a steelhead stream. The D, E, F, G, AT&T and N Ranches also drain into Drakes Estero. Why no BMPs on those ranches? Why no E. coli readings?

According to the FEIS for the Drakes Bay Oyster Company Special Use Permit, “[t]he primary source of bacterial pollution [in Drakes Estero] is from cattle waste originating from the six cattle ranches within the watershed.”

<https://parkplanning.nps.gov/document.cfm?parkID=333&projectID=33043&documentID=50651> at 249. “Fecal coliform levels in most of Drakes Estero have been shown to intermittently rise after rain events associated with runoff from pastures . . . Leased cattle ranches surrounding Drakes Estero allow cattle to graze within close proximity to the shoreline.” *Ibid.* Why does the Park Service allow that?

The FEIS continues: “Within the Drakes Estero watershed, which also is recognized by NMFS as potential steelhead habitat, creeks known to support California steelhead include East and North Schooner, Glenbrook, Muddy Hollow, Home Ranch, and Laguna.” *Id.* at 242. “[S]everal tributary creeks feeding Drakes Estero have segments of critical habitat . . . “These creeks include Creamery Bay, East Schooner, Home Ranch, Laguna, and Muddy Hollow (NMFS 2005a).” *Id.* While CDFG does not believe coho salmon are present in this area of the Seashore, it has designated Drakes Estero as critical habitat for coho. *Id.*, at 241. (Emphasis added.)

Drakes Estero deserves far more monitoring (and/or disclosure) and analysis than this.

#### Kehoe Watershed.

PAC1A. “Tributary to S. Kehoe Creek on I Ranch West. Flows north through mostly ungrazed area.” (Emphasis added.) Median reading for E. coli is 350 CFU/100ml. That’s slightly more than allowable. Highest reading is 240,000. That’s 750 times what is allowable.

PAC1B. “Small tributary at headwaters of S. Kehoe Creek just below main L Ranch feeding corral.” Median reading for E. coli is 13,600 CFU/100ml. That’s more than 40

<sup>15</sup> For a very recent article about a chemical in tire tread that is killing coho salmon, see: <https://www.seattletimes.com/seattle-news/environment/tire-dust-is-killing-salmon/>

times what is allowable. Highest reading is 1,280,000. That's 4,000 times what is allowable.

PAC1S. "S. Kehoe Creek mainstem downstream of L and I Ranches. Flows north through ungrazed area." Median reading for E. coli is 630 CFU/100ml. That's about twice what is allowable. Highest reading is, again, 1,280,000, which is 4,000 times what is allowable. For a photo of the area of this station with cows feeding in the creek, see Kehoe Photo 3 below.

PAC2. "N. Kehoe Creek mainstem downstream of J and K Ranches at culvert under Pierce Point Road." Median reading for E. coli is 1,840 CFU/100ml. That's almost six times what is allowable. Highest reading is, again, 1,280,000, which is 4,000 times what is allowable.

PAC2A. "Branch of N. Kehoe Creek at culvert under Pierce Point Road adjacent to J Ranch concrete cattle runway above dairy buildings." Median reading for E. coli is 1,240 CFU/100ml. That's almost four times what is allowable. Highest reading is, again, 1,280,000, which is 4,000 times what is allowable.

PAC2B. "Branch of N. Kehoe Creek at culvert under ranch road downstream of J Ranch dairy." Median reading for E. coli is 2700 CFU/100ml. That's more than eight times what is allowable. Highest reading is 400,000. That's 1,250 times what is allowable.

PAC2D. "Tributary of N. Kehoe Creek just downstream of J Ranch waste storage ponds." Median reading for E. coli is 4,450 CFU/100ml. That's fourteen times what is allowable. Highest reading is 128,000. That's more than 400 times what is allowable.

PAC3. "Kehoe Creek lagoon adjacent to Pacific Ocean." Median reading for E. coli is 520 CFU/100ml. That's above the 320 that is allowable but one of the lowest readings of the 14 stations. Highest reading is 128,000. That's more than 400 times what is allowable. What does the lagoon look like? See Kehoe Photo 5 below.

If one reads the descriptions for the 14 stations one will see that four are "ungrazed areas" and one is referred to as "limited grazed lands." The same can be said for ABB4, the footbridge that crosses Abbotts Lagoon at the beach and far from any grazing. All of these stations should be located in places that would enable monitoring of the effects of grazing on the watersheds in the two parks.

Turbidity. The authors state that "[t]urbidity was only monitored consistently from 2010-2013, was generally below selected ecological thresholds at most stations, and did not show a trend over time." In other words, the BMPs did not show any improvements regarding turbidity. Pawley and Lay write in their Coastal Watershed Assessment that:

There are a paucity of measurements compared to other parameters, but some sites had **extremely high turbidity measurements**, including sites along the mainstem and tributaries of Olema, OLM 11 at Bear Valley Bridge exhibited the highest measurements (887 NTU), followed by South Kehoe

(PAC1),<sup>16</sup> Five Brooks (OLM14) and Lower Olema Creek (OLM10B), B Ranch (DBY2) and Creamery Creek (DES1)<sup>17</sup> were also fairly high.

(Emphasis and bolding added.)

In summary, there is no data in the report that establishes that the Park Service is in compliance with E. coli standards and there is still no basis for the Park Service saying that “the Preferred Alternative is maximally consistent with Sections 30230-30231 of the California Coastal Act.”

## **E. MY PERSONAL OBSERVATIONS REGARDING KEHOE CREEK**

While the authors of Appendix L try to convince the reader that things are getting better at Drakes Bay/Estero, Abbotts Lagoon and Kehoe Creek, I have been observing Kehoe Creek since 2010 when I began photographing wildlife in the ranching area of the seashore and it is not getting any better. Kehoe Creek runs along Pierce Point Road for much of its way and it’s hard not to see it. What is said in the 2013 Coastal Watershed Assessment about the pollution of Kehoe Creek is consistent with my own observations as shown below.

Kehoe Creek is comprised of two north forks and a south fork. The north forks begin on the J (Kehoe/dairy) Ranch and K (Evans/beef) Ranch and flows south. The south fork begins on the L (Mendoza/dairy) Ranch and flows west until it reaches Pierce Point Road where it turns north. There it is joined by a short tributary from the I Ranch that starts on the west side of the road and crosses it.

<sup>16</sup> PAC1 is a Kehoe Creek station. Why the authors didn’t list it on page 9 as a Kehoe Creek station is unknown.

<sup>17</sup> DES1 is a station for Creamery Bay, which is part of Drakes Estero. Why the authors didn’t list it on page 9 as a Drakes Estero station is unknown.





Kehoe Photo 1. The pond in this photo is located on the L Ranch at the headwaters of the South Fork of Kehoe Creek. L Ranch cows, like the one in the photo, walk into this pond every day and urinate and defecate in it and then drink the water from it. Needless to say, this pollutes the pond. Furthermore, if any of the cows in this dairy herd has Johne's disease,<sup>18</sup> the disease can survive for a year outside the infected animal and travels with the water downgrade to possibly infect any wild or domestic ungulates that drink the water or eat any contaminated vegetation growing in the creek.

All the farm ponds at PRNS and GGNRA should be fenced to exclude cattle. That is standard practice.

A farm pond is a pool of water formed by a dam or pit. You can use it to supply drinking water for your cattle . . .

On hot summer days, cattle like to stand around in ponds trying to cool off. Doing so is unhealthy for your cattle and for your pond. The cattle will urinate and defecate in the same pond water that often serves as their drinking water . . .

For the foregoing reasons, most farm ponds should be completely fenced so cattle can't go around or in them. You can take advantage of gravity by using

<sup>18</sup> Johne's is a "crowding" disease that affects dairy cattle more than beef cattle and it affects more than half the dairy herds in the United States. It is a fatal, but slow-progressing disease and dairy cows are normally slaughtered in their fourth year before the disease becomes manifest. It afflicts an unknown number of PRNS cattle and elk (who got it from the PRNS cattle).

a drain pipe to bring water from the pond to a water tank at a lower elevation outside the fenced area.

“Raising Beef Cattle for Dummies,” Nikki and Scott Royer, at 125-26. (Emphasis added.) In addition to gravity, pond water can be moved to tanks using electric and solar power.

Fencing cattle out of ponds isn’t only good for the cattle, as the Royers state, but also for any watercourse it’s a part of. As with most ponds, the pond shown above was created by excavating a hole below a seep or spring and pushing the soil down elevation to form an earthen dam which temporarily retains the water coming from the seep or spring. The dam and pond bottom aren’t impervious though. The water in this pond eventually drains down elevation into and through a pond below it.



Kehoe Photo 2. Above is a photo of that lower pond. This pond is completely covered by algae or some plant material due to excessive nutrients from manure. Virtually all of the ponds that I see in PRNS are unfenced and covered with vegetation which I believe (supported by the DEIS and Coastal Watershed Assessment) is due to high amounts of nutrients in the manure getting into the ponds. The pond water ultimately flows via the surface and/or below surface to the main stem of the South Fork of Kehoe Creek along Pierce Point Road. Then, joined by flows from the I Ranch tributary and pond, the waters become the mainstem of the South Fork.





Kehoe Photo 3. Here is a photo of two beef cows from the K Ranch in the mainstem of the creek eating sedges. The creek is completely choked by the sedges because of excessive nutrients from manure. It should be open water, or mostly open water, and narrower and deeper, but cows have destroyed its banks thereby widening the creek and making it shallower. These cows are in the area of Station PAC1S which, on page 9 of the Voeller et al report, shows an *E. coli* median reading of 630 CMU/100ml, twice the allowable limit, and a high reading of 1,280,000, which is 4,000 times the limit.

The reeds are choking the creek because of excessive nutrients (from manure) which is in the entire Kehoe Creek watershed, as stated in the DEIS and the Coastal Watershed Assessment. The authors of Appendix L did not cover nutrients, but if they had, Kehoe Creek would be off the charts. I should point out that there is a barbed wire fence on the east side of the creek in its riparian corridor and then another fence part way up a large slope. The authors of Appendix L state that PACS1 is an “ungrazed area.” Not when the cows are in the creek. I have seen beef cows inside both fences numerous times. I haven’t been to the park as much as usual due to the pandemic and fire, but when I was there on June 2, 2020, there were about 35 cows inside and outside of the riparian fence. Some were in the creek. There should be one fence and it should be at the top of the slope to keep manure out of the creek, regardless of weather. The riparian fence should be removed because cows should never be allowed to graze in the riparian area of a creek in a unit of the national park system. This creek begins and ends in PRNS and I have never seen such an obviously polluted creek anywhere, let alone in a national park.





Kehoe Photo 4. Above is a photo of Kehoe Pond at the Kehoe Beach parking lot. The pond is totally covered with pennywort which has grown out of control. It wouldn't cover the pond if excessive nutrients in the form of manure weren't getting into the watercourse.

The water then flows under Pierce Point Road via culvert (and, during heavy rains, over the surface of the road) and, ultimately, to Kehoe Creek Lagoon at the beach.



Kehoe Photo 5. Here is a photo of Kehoe Creek Lagoon. In heavy rain events this lagoon flows into the ocean. From Pierce Point Road to where the beach begins, it is completely overgrown with very tall aquatic vegetation. At this point at the beach it is covered by algae or some other growth. This is also PAC3 discussed on page 9 of Appendix L. It has a median *E. coli* reading of 520 CFU/100ml which is a little less than twice the allowable reading and a high reading of 128,000. Appendix L limits itself to *E. coli*, but if it covered nutrients, the reading here would likely be very high.

As the Park Service said in its DEIS:

Data collection in Kehoe Creek has shown elevated levels of contaminants including nutrients and sediment (NPS 2004a; Pawley and Lay 2013). Stormwater runoff from nearby dairy operations and pasture land into Kehoe Creek is contributing to these high levels. High potentially pathogenic bacteria counts have also been observed in Kehoe Creek and Abbotts Lagoon, and many samples exceeded the potentially pathogenic bacteria standard (Coopridge 2004; Pawley and Lay 2013).

DEIS at 69.

To give the reader a clearer understanding of what is going on with respect to the South Fork of Kehoe Creek I have downloaded a photo from Google Earth and marked certain locations.





Kehoe Photo 6. At the bottom left and right I have marked the two dairies that drain into the South Fork of Kehoe Creek. At the bottom left is the I Ranch dairy (which also drains into Abbotts Lagoon). It is authorized for 856 dairy cows. At the bottom right is the L Ranch dairy which drains into Kehoe Creek. It is authorized for 400 dairy cows. The K Ranch (beef) grazing lands drain into the main stem of the South Fork on its east side. Other K Ranch lands outside the photo to the north lie east of the North Fork and drain into it. It is authorized for 72 beef cows (plus calves). (The J Ranch dairy drains into the North Fork of Kehoe Creek and is authorized for 756 dairy cows.)

Ponds 1 and 2 on the L Ranch drain into Kehoe Creek. The ponds are not fenced and cows go into them for water and urinate and defecate in them when they do so. To the left of these ponds is a pond on the I Ranch which is at, or in the vicinity of, monitoring station PAC1A. It is also unfenced and cows go in it every day to drink water and when they do they also urinate and defecate. Those ponds were dug in the water courses for Kehoe Creek and the water in the ponds percolates through the dams and pond bottoms and drains down elevation to the mainstem of the South Fork of Kehoe Creek as the water did before the ponds were dug, although more slowly now. The ponds are concentrating sources for manure. These ponds are one significant way a lot of manure or its constituent parts is getting into the South Fork of Kehoe Creek. The other ways are by K Ranch beef cows going into the creek and its tributaries and urinating and defecating in them and by K Ranch beef cows

grazing on the hills on the east side of the South Fork and urinating and defecating. Rainfall will wash that manure into the creek. If the ponds and water course were fenced and the hillsides were fenced to exclude cattle there would be little livestock pollution in the South Fork. But that will never happen because NPS will never require it. Consequently, water quality will never significantly improve in the South Fork Kehoe Creek Watershed or anywhere else in the parks because, again, the Park Service will never require it.

In summary, this is not what a creek is supposed to look like, especially in a national park. But if you put enough manure in it, this is what you get.

### III. Conclusion.

The preferred alternative is not consistent to the maximum extent practicable with sections 30230 and 30231 of the CCMP.

With respect to section 30230, it provides that marine resources must be protected, maintained and, where feasible, restored. Marine resources include endangered coho salmon, threatened steelhead,<sup>19</sup> elephant seals, harbor seals, river otters, various avian species and the very waters themselves. Ranching, because of its impacts on water quality conditions, is having a very negative effect on all of these species. They are not being maintained, let alone enhanced or restored. Section 30230 also provides that “[s]pecial protection shall be given to areas and species of special biological significance.” That language applies to the two parks and the wildlife just listed. The Park Service is not providing that special protection as shown in the discussions above about water quality. The only thing the Park Service protects in these 28,000 acres of public park land is the private business of ranching.

With respect to section 30231, it provides that “[t]he biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored . . . .” This language protects all the waters in the two parks. But the biological productivity of the waters is not being maintained and certainly not restored, as shown throughout this letter. Section 30231 further states that the adverse effects of wastewater discharges are to be minimized and runoff is to be controlled. There are 3,330 dairy cows authorized in the two parks plus 2,400 beef cows (each with a calf. A dairy cow produces 120 pounds of manure each day. Plus, more water is used to flush that manure from the concrete floors of milk parlors and free-stall barns into manure ponds where it is stored until it is later sprayed onto pastures. Some of that sprayed manure gets into watercourses as does the manure of beef cows that range all over each ranch and spread their manure over larger watershed areas. Manure that is not

<sup>19</sup> The latter exists, according to one source, in 18 PORE streams and 21 GOGA streams. <http://npshistory.com/publications/pore/nrr-2019-1895.pdf>, Appendix D. Some have dams on the ranch lands which can interfere with spawning. *Ibid.* For example: “There are small dams on several of the tributaries that drain into Olema Creek, many of which likely restrict steelhead movement.” Page 292. Olema Creek begins and ends on park land. Presumably, most if not all of these tributaries, and their dams, are on park land as well.

completely absorbed by the soil is washed into the nearest creek when it rains. Section 30231 states that interference with surface water flow is to be avoided and we should minimize the “alteration of natural streams.”. All of the dams in the watercourses in the ranching area violate these provisions. See, for example, footnote 19 and the dams in the two parks on NPS land, especially in Olema Creek tributaries. Furthermore, there are 120 stock ponds in the ranching area.

[https://www.nps.gov/pore/getinvolved/planning\\_gmp\\_amendment\\_feis.htm](https://www.nps.gov/pore/getinvolved/planning_gmp_amendment_feis.htm), at 168.

“[N]umerous livestock watering ponds were constructed by building earthen dams across drainages.” <http://npshistory.com/publications/pore/nrr-2019-1895.pdf> at 62. All 120 of these dams/ponds interfere with “surface waterflow,” contrary to Section 30231.

In short, there is absolutely no basis for the Park Service to claim it is consistent to the maximum extent practicable with the CCMP regarding water.

Sincerely yours,

s/ James Coda





The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act promises to protect natural resource areas from overuse (Section 30210).

By definition, agriculture takes natural resources - alters the natural landscape - and transforms it into products. Allowing agriculture interests to continue and expand directly violates this section, as natural resources are consumed not protected.

Cattle and dairy ranching have contributed to overuse of the soil within the park and within the coastal zone. The FEIS states "Generally, soil issues in the major land resource areas of the Central California Coast Range are erosion, maintenance of soil organic matter content, and low infiltration rates resulting from hydrophobic soils (USDA-NRCS 2006b). Land uses in the planning area may affect soil processes through erosion, compaction, alteration of soil structure and microbial communities, and reduced soil productivity or fertility. Activities associated with beef and dairy cattle ranching operations such as livestock grazing and trailing; tilling/cultivation; seeding; mowing for forage production; and nutrient, brush, and weed management may affect soil processes. Activities like manure spreading alter the natural soil fertility by increasing soil nutrients, such as nitrogen, phosphorus, and potassium (McKenzie et al. 2003). During the winter, erosion hazards could stem from sheet or gully erosive processes on unprotected upland soils and sloped terrace soils (USDA-NRCS 2006b)."

Below are two aerial views of ranch land within the park where a fence separates land that has and has not been grazed. The grazed land is the barren areas noticeably lighter in color.





#### California Coastal Act - Section 30211

*Development should not interfere with the public's right to access the sea*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act declares that access to the park should “not interfere with the public’s right to access the sea” (Section 30211).

The land leased by private individuals in the park is located adjacent to the ocean and the beach, obstructing public access. When I visit the park, I am unable to access the ocean from all directions, as I am blocked by ranches/farms. The private operations block me from swimming/engaging with the ocean. Allowing extra development/diversification of ranching land further discourages members of the public from accessing the ocean through the ranching land.

#### California Coastal Act - Section 30213

*Lower cost facilities for visitors shall be provided*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that it must provide “lower cost facilities” (Section 30213).



As the ranchers are allowed to manage their own facilities, the prices cannot be regulated by a public agency, allowing reasonable, lower cost facilities to exist. The GMPA states that "Fees for any new overnight accommodations established within the planning area through the Preferred Alternative would be subject to review criteria" - but if you're leaving the price-setting to private parties, they have more incentive to maximize profits than publicly-owned facilities would. This arrangement seems to set an operation in place in contradiction to this section of the Act.

## **Recreation**

### California Coastal Act- Section 30220

*Protect areas where water-oriented recreation activities can occur*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that it will protect areas where water-oriented recreation activities can occur (Section 30220).

Waste from cattle and dairy ranches flows into the sea and pollutes the coastal waters. Pollution of this sort is detrimental to the quality of that eco-system - for humans - it is not safe to swim in and prevents other recreational activities, as well. This situation violates the promise of this section.

### California Coastal Act- Section 30221

*Oceanfront land suitable for recreational use shall be protected*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that it will protect oceanfront land suitable for recreational use (Section 30221).

I have been trail running, hiking and biking in Marin for over 20 years, while my husband has been doing the same for over 45 years. Not once do we venture out specifically to see cows, dilapidated barns, flies, piles of manure or to smell cattle droppings.

The following photos are of cattle ranches within Point Reyes National Seashore. While I don't know how close these particular ranches are to the coastal zone, I do know that similar ranches are near, if not within the coastal zone. None of it is enticing to an outdoor enthusiast. And none of it belongs in a national park or near our coast which should be reserved for the enjoyment of nature.

I Ranch McClure calves silage 16 Nov 2020



L Ranch Feed Area 16 Nov 2020



I Ranch McClure loafing Barn 16 Nov 2020





L Ranch living quarters for ranch workers 16 Nov 2020



California Coastal Act- Section 30222

*Commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry (Section 30222).

The diversification of the ranching industry is technically a general commercial development rather than agriculture industry development. For example, farm stays/ ranch tours are NOT agriculture-related industries, they are tourism activities. Including these industries for areas of expansion indicates that the ranching individuals are more interested in general commercial development and maximizing profits than they are interested in protecting the seashore and following the CCA.

Animal agriculture is excessive and not mandatory to keep in the park, as it is separate from the general agriculture industry.

#### California Coastal Act - Section 30223

*Upland areas shall be reserved for recreational activities and infrastructure*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that upland areas should be reserved for recreational activities and infrastructure (Section 30223).

The GMPA concedes that "there are some restrictions within the ranch core area to protect property." These restrictions violate section 30223.

#### California Coastal Act- Section 30224

*Recreational boating use should be encouraged*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that recreational boating should be encouraged (Section 30224). Nothing in the new plan encourages boating; in fact, the amendment discourages boating. Water areas are not protected by the NPS, ranching activities pollute them.

### **Marine Environment**

#### California Coastal Act - Section 30230

*Marine resources shall be maintained, enhanced, and where feasible, restored*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that marine resources shall be maintained, enhanced, and where feasible, restored (Section 30230). The amendment expands the dairy and cattle ranchers rights to include the following which will continue to contribute to the decline of marine resources:

The GMP amendments allow the intensification of land uses on 17,000 acres in the Seashore and on 10,000 acres in the Northern section of the Golden Gate National Recreation Area (in the Olema Valley), managed by the PRNS. These 26 ranches are currently under agricultural leases for beef cattle grazing and for dairy farm grazing.

The NPS preferred alternative (B) will:

1. Increase the acres devoted to ranching in the parks by 12,800 acres.
2. Allow a new commercial land use, Small Retail, for stores and stands for agricultural products.
3. Allow a new industrial land use, Ag Processing, for small cheese factories.
4. Hostels, tent cabins, farm stay rooms, and various camping accommodations.
5. Housing and offices for volunteer organizations.
6. Other adaptive reuses of ranch buildings.
7. Horse boarding.
8. Row crops (2.5 acres per ranch).
9. Small livestock (40-70 sheep, goats, or pigs per ranch) and up to 500 chickens.

The existing number of cattle will be allowed (5,500 head).

10. Elk will be shot, so as to be "compatible with authorized ranching operations."

The FEIS states "...activities associated with beef and dairy cattle ranching would continue to affect watersheds in the planning area, primarily as a result of livestock grazing, and dairy operations (where livestock congregate in high-intensity-use areas and Manure and Nutrient Management)... The removal of dairy operations under alternative E would eliminate adverse impacts on surface water quality associated with Manure and Nutrient Management, Forage Production and diversification in the Pasture and Ranch Core subzones. Alternatives D, E, and F would also have beneficial impacts on water quantity from the reduction or elimination of authorized livestock numbers. Under alternative F, impacts on water quality would be noticeable, long term, and beneficial because ranching activities would be phased out across the entire planning area. Under all alternatives, public use and enjoyment and elk management actions could have short-term, adverse impacts on water quality in localized areas in the planning area." Watershed areas within Point Reyes National Seashore drain into the coastal waters and are therefore required to meet the Coastal Act regulations.

*Special protection shall be given to areas and species of special biological significance*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that protection shall be given to areas and species of special biological significance (Section 30230).

1. The Final EIS states impacts on wildlife related to beef and dairy ranching include "disturbance, trampling, erosion, and nutrient inputs." If beef and dairy ranching were removed from the park "ecological succession would occur as grassland habitats transition into shrubland or forested habitats, which would increase habitat for some species."



## **2. Snowy Plover - protected by the Endangered Species Act**

The PRNS website states that ravens are a common nest predator of the snowy plover. Two studies were done that examined the impact of ranches on the snowy plover population:

Roth, J.E., J.P. Kelly, W.J. Sideman, M.W. Parker, and S.G. Allen. 1999. Ecosystem-Level Management of Common Ravens on the Point Reyes National Seashore.

DiGaudio, R.T., D.L. Humple, and T. Gandali. 2015. Estimating Impact of Mowing in the Silage Fields of Point Reyes National Seashore on Breeding Birds.

Here are key points from those reports:

Roth, et. al, report-

- "Preliminary results suggested that a few ravens specialized on Common Murre (*Uria aalge*) colonies, while many individuals visited Snowy Plover (*Charadrius alexandrinus*) nesting areas.
- Raven predation (clutches lost to ravens/total failed clutches) on Snowy Plover eggs increased from 38% in 1986 to 65% in 1989.
- The PRNS raven population is being subsidized by abundant food resources available at ranches.
- Common Ravens (*Corvus corax*) were concentrated at ranches at Point Reyes National Seashore (PRNS) and focused much of their foraging effort in those areas. Range size of non breeding birds was larger than that of breeding birds.
- The most prevalent habitats associated with foraging were grazed grass, dunes, and cattle feeding areas. The most prevalent food items identified were small animals, including birds, rodents, and reptiles; calf carcasses and afterbirth; and grain.
- Controlling ravens' access to these resources may lead to a lower population level, thereby reducing their impact on vulnerable avian species."

Each of those bullet points taken from the report essentially condemn the ranches in terms of their influence on raven behavior and population levels.

The DiGaudio, [et.al](#) study focused on the effect of silage field mowing on multiple bird species, particularly species likely to nest in the fields. However, it also mentioned the large numbers of ravens seen in the area scavenging the aftermath of the silage.

- "These silage fields, which attract and feed the ravens, are located in close proximity to beaches with snowy plover nests, ironically the same locations the signs about protecting the plovers are placed. The two ranches associated with that area, Kehow and McClure, have large numbers of ravens easily seen with the naked eye year round.
- The dominant species observed in the mowed silage was Common Raven, which does not breed in these fields (as it nests on cliffs, in trees, and on structures; Boarman and Heinrich 1999). On two occasions, flocks of about 35 individuals were observed foraging on the ground in a recently mowed field, apparently scavenging for food items that were likely made accessible by the mowing, including one observation of what appeared to be a dead pocket gopher (*Thomomys bottae*)
- Prior to mowing, there were eight bird species confirmed or suspected of breeding in the silage fields. Four of these were ground-nesting species: Mallard, Northern Harrier, Savannah Sparrow, and Grasshopper Sparrow. Three other species – Song Sparrow, White-crowned Sparrow, and Red-winged Blackbird – typically nest within 1 m of the ground in sturdy vegetation. The eighth

species – Brown-headed Cowbird – is a brood parasite, laying its eggs in the nests of other bird species for them to raise.

Both studies suggested altering ranching methods for the sake of assisting the declining bird populations and controlling the raven populations.

3. Over fifty plants at the Seashore are currently listed by the federal government, state government, or the California Native Plant Society. And more than fifty species of animals at Point Reyes are listed by the state or federal government as threatened, rare, or endangered, including many dependent on the coastal zone.
4. Point Reyes protects some of the “last remaining high quality coastal dune habitat in the United States,” which provides habitat for 11 federally listed plant and wildlife species (NPS 2015b). Approximately eight ranches operate around coastal dunes.
5. Ground-nesting species, such as the California horned lark (*Eremophila alpestris actia*), savannah sparrow (*Passerculus sandwichensis*), grasshopper sparrow (*Ammodramus savannarum*), song sparrow (*Melospiza melodia*), western meadowlark (*Sturnella neglecta*), California quail (*Callipepla californica*), and northern harrier (*Circus cyaneus*), could be susceptible to impacts from cattle grazing and Vegetation Management (e.g., plowing and harvesting).
6. Agricultural activities that affect songbird populations could also affect the foraging of American peregrine falcons (*Falco peregrinus anatum*), which nests at Point Reyes, and merlins (*Circus cyaneus*). Several other special-status raptors rely on grassland habitats, including the burrowing owl (*Athene cunicularia*), white-tailed kite (*Elanus leucurus*), and ferruginous hawk (*Buteo regalis*), and could be affected by habitat alteration from livestock grazing and Vegetation Management.

*Special protection shall be given to areas and species of special economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that protection of the marine environment that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes (Section 30230).

According to water-quality data downloaded from The Water Quality Portal, a cooperative service sponsored by the U.S. Geological Survey, Environmental Protection Agency and National Water Quality Monitoring Council, Kehoe Creek consistently exceeds water quality criteria and standards and is one of the most polluted waterways in the state.

The main sources of water quality degradation in the planning area are bacteria and nutrient loading from nonpoint sources associated with ranches, dairies, septic systems, and stormwater runoff (Wallitner 2013; Pawley and Lay 2013).



Associated runoff contributes most of the water quality constituents of concern to surface waters such as Tomales Bay (Carson 2013).

The Final EIS states that accumulation or high levels of nutrients in surface water can cause algae to grow faster than ecosystems can handle, while pathogenic bacteria can pollute surface water, contaminate groundwater, and spread disease.

The Final EIS states sediment loading from erosion and degradation associated with ranch and dairy activities, land development and disturbance, stream channel alteration, and stormwater runoff also affect many of the surface waters. Sediment loading can cause a variety of impacts, including turbid water, which can prevent aquatic species from seeing food, vegetation growth, and disrupt the natural food chain, damaging coastal resources (Wood and Armitage 1997)

As a result of these studies, the San Francisco Bay RWQCB listed Tomales Bay and its major tributaries, including Lagunitas Creek and Olema Creek, as impaired for nutrients, pathogens, and sedimentation/siltation under section 303(d) of the Clean Water Act (SWRCB 2010).

The Final EIS states that most San Francisco Bay RWQCB groundwater water quality objectives are in narrative form. Shouldn't there be critical numeric goals to ensure there is appropriate water balance to support any of the proposed water uses while conserving/preserving natural resources and preventing any overdrafting of groundwater resources?

#### California Coastal Act- Section 30231

##### *Maintaining water supply to maintain optimum populations of marine organisms*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that maintaining water supply to maintain optimum populations of marine organisms (Section 30231).

Multiple springs, seeps, and wells in the planning area are used for cattle watering and private potable water supply (NPS 2012a; Pawley and Lay 2013). These groundwater resources likely have limited storage capacities or yields and are adequate only for uses requiring small quantities of water (McClelland 1963).

While the Final EIS states that livestock operations generally withdraw more surface water than groundwater, it also notes during the drier summer months when surface water levels are lower, groundwater can contribute a relatively larger amount of freshwater and associated nutrients or potentially pathogenic bacteria to receiving water sources. Shallow groundwater and surface water can mix in the area of sediment and porous space beneath stream beds, which can allow pollutants to enter groundwater (Stocker et al. 2016).

##### *Maintaining water supply for the protection of human health* *Maintaining water quality*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that maintaining water supply for the protection of human health and maintaining water quality (Section 30231).

The Final EIS states “activities associated with beef and dairy cattle ranching would continue to affect watersheds in the planning area, primarily as a result of livestock grazing, and dairy operations (where livestock congregate in high-intensity-use areas and Manure and Nutrient Management).”

Particularly “minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of groundwater”

And finally “that accumulation or high levels of nutrients in surface water can cause algae to grow faster than ecosystems can handle, while pathogenic bacteria can pollute surface water, contaminate groundwater, and spread disease.”

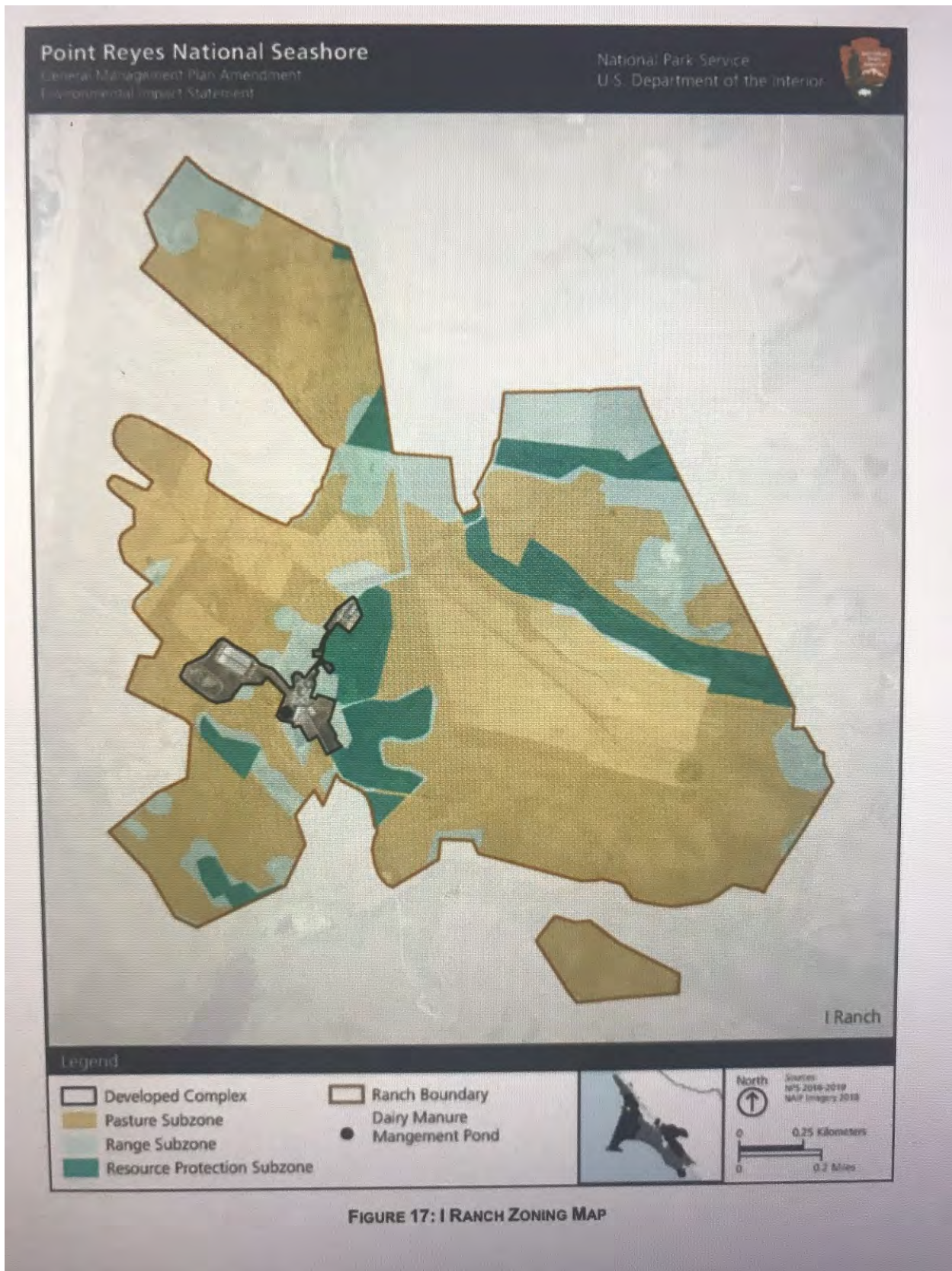
#### **Article 4 Land Resources**

##### California Coastal Act- Section 30240

*Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values(Section 30231).

The NPS GMP proposes to implement a “subzoning framework” to designate areas where cattle can be pastured and other areas where “resources” will be protected. Resource protection zones are so scattered and of such irregular shape that limiting cattle access where to them is infeasible, as shown here in Figure 17 from the GMP EIS Appendix A.



## Scenic and Visual Qualities

### California Coastal Act- Section 30251



*The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.*

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that any development should restore and enhance visual quality in visually degraded areas (Section 30231).

One impact not discussed adequately in the CD is the damage to visitors' quality of experience caused by the ranches. Ranches are visible from most coastal areas in the park and from most roads within the park that lead to coastal recreation areas. The GMPA Alternative F., which terminates the ranch leases, would expand the Scenic Landscape zone to cover the 28,500 acres of ranches (EIS, App. A., Figure 39). The removal of the ranch buildings and cattle would greatly enhance the scenic values for the 2.5 million annual visitors as they drive through the upland areas on their way to the coastal zone. The NPS also states in the EIS that if ranching were discontinued, some of the retired ranch buildings "could support a higher level of visitation" with campgrounds, larger trailhead parking areas, and other uses (pg. vi and pg. 196).

As shown in the photos above of L Ranch and I Ranch there is nothing visually appealing about piles of manure, old trailers, barbed wire fences, feeding lots, piles of old tires, and loafing barns. Nothing in the Park's GMPA preferred alternative B addresses these issues.

The California Coastal Commission should use the California Coastal Act to conserve and protect the full dimensions of Point Reyes National Seashore and Golden Gate National Recreation Area as provided in the letter and spirit of the 1916 Organic Act and the two enabling park laws. This GMP preferred Alternative B is clearly not "consistent to the maximum extent practicable" with the California Coastal Act, Ch. 3. Actually, it will result in large adverse impacts on several Coastal Act objectives. In the Draft EIS the NPS made it clear that the Alternative B., caused the largest adverse impacts, compared to the No Action and all other alternatives.

Thank-you for your time and consideration in this matter.

Gayle Cerri  
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Novato, CA. 94945  
[Gcerri847@gmail.com](mailto:Gcerri847@gmail.com)  
415-246-2873

December 1, 2020

To: California Coastal Commission

RE: Point Reyes National Seashore General Management Plan Amendment Consistency Determination

The National Park Service (NPS) at the Pt. Reyes National Seashore (PRNS) has submitted for your review a Federal Consistency Determination for the adoption of amendments to the Seashore's General Management Plan (GMP) and the accompanying Final EIS, which I understand will be discussed during your meetings in January.

I urge the Commissioners to reject the NPS submittal because it misrepresents the consistency of the GMP with the California Coastal Act with respect to Chapter 3 Article 2 - Public Access, Article 3 - Recreation, Article 4 - Marine Environment, and Article 5 - Land Resources.

The majority of Point Reyes National Seashore is west of Tomales Bay and drains to the Pacific Ocean either directly or via Drakes Estero and Drakes Bay. Yet the NPS hasn't conducted surface water quality sampling in drainages to these areas since 2013 and the data provided show that water quality standards are exceeded in most locations.

The NPS consistency statement claims *"The NPS has also conducted analysis of long-term water quality data in the coastal drainages ... (see appendix L of the GMPA/EIS). In these areas, the data indicate decreasing trends in fecal indicator bacteria concentrations over time, coinciding with adjustments in ranch operations (e.g. transition to organic dairy operations, reduced herd size, etc.) and implementation of Management Activities to protect water resources."* The paper contained in Appendix L (Voeller et al. July 14, 2020) documents that median bacteria levels as high as 48,000 MPN/100 ml have posed a risk to the marine environment and human health at PRNS from 2001 to 2013 and probably continue to do so, as no surface water quality data for the past seven years are offered. That this paper was produced only four months ago reflects the NPS indifference to the impacts from private dairy and beef industry on public parks in coastal California. At 13 of 14 monitoring stations, the median fecal bacteria levels exceeded the San Francisco Regional Water Quality Control Board E. coliform single sample water contact recreation not to exceed value of 104 MPN/100ml and at 12 of fourteen stations exceeded the California Ocean Plan not-to-exceed standard for fecal coliform density of 400 MPN/100 ml. At seven sites bacteria levels are in the thousands. The Voller et al. (2020) correlations of fecal indicator bacteria between 2001 and 2013 show decreases, but the bacteria levels still far exceed water quality standards. This indicates that the "adjustments in ranching operations" cited by the NPS are inadequate. The NPS statement about reductions in herd sizes or organic dairy changes are not documented in the GMPA.

Surface water monitoring is limited spatially as well as temporally. As shown in the attached figure, which summarizes data from the GMP EIS Appendix L, surface water quality data were reported for monitoring stations on only seven (H, I, J, K, L, N and Home) of the 17 ranches in the coastal drainages. This leaves large areas in southwestern PRNS where surface water impacts of beef and dairy operations are unmonitored and, based on data from other areas,



potentially polluting a large portion of the coast. A 2001 paper produced by the NPS (*Point Reyes National Seashore Water Quality Monitoring Report May 1999 – May 2001* by Brannon Ketcham (November 2001) reported mean fecal coliform levels in the three ranches on the southernmost portion of the PRNS peninsula (A, B, and C) ranging from 2,400 to 495,000 MPN/100 ml. The NPS failed to conduct longer term sampling even though data from 2001 show extremely high fecal coliform levels. No sampling appears to have been conducted in drainages from D, E, F, and G ranches which also flow toward Drakes Bay and/or Drakes Estero.

In its consistency determination the NPS fails to mention that when fecal indicator bacteria have exceeded standards in the past their response has been to close surface waters to the public, which impairs access and recreation and is inconsistent with the *California Coastal Act Article 3 Recreation: Section 30220 - Protection of certain water-oriented activities* “Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses”.

The NPS also fails to mention their proposed “diversification” of land use and the resulting new sources of animal feces: “Diversification of ranching activities under alternative B could include new types of livestock, crops, horse boarding....” (GMP EIS pages 42 – 43). This could contribute waste from up to 500 chickens, as well as manure from boarded horses at each of the 17 ranches.

*Article 5, Land Resources Sec. 30240(a).* “Environmentally sensitive habitat areas shall be protected...” The NPS GMP proposes to implement a “subzoning framework” to designate areas where cattle can be pastured and other areas where “resources” will be protected. Resource protection zones are so scattered and of such irregular shape that limiting cattle access to them is infeasible, as shown here in Figure 20 from the GMP EIS Appendix A. The NPS GMP EIS states that more fencing will be erected; although it doesn’t say where, it will certainly limit access by the public to coastal areas of the park. Also, pasture and range subzones extend to edge of the ocean (an example is shown on this figure) and Drakes Estero and Drakes Bay (shown on other figures in the EIS).



FIGURE 20: J/K RANCH ZONING MAP

The beef and dairy operations in PRNS cause very poor range quality and bare soils leading to widespread soil erosion, sedimentation, and manure pollution of nearby creeks. A simple drive through the ranch areas on paved roads clearly shows hardened soil surfaces, gully erosion, creek eutrophication, and surface water pollution.

*Sec. 30243. "The long-term productivity of soils... shall be protected..."* Many of the dairies are so overgrazed near the barns and feeding areas that the soils are bare from trampling and contribute to sedimentation from soil erosion, and turbidity and eutrophication of coastal waters. These photos, taken from Pierce Point Road on November 21, 2020, looking across the J/K, and I ranches show the degraded soils, erosion from cattle trampling, and limited public access due to barbed wire fencing.

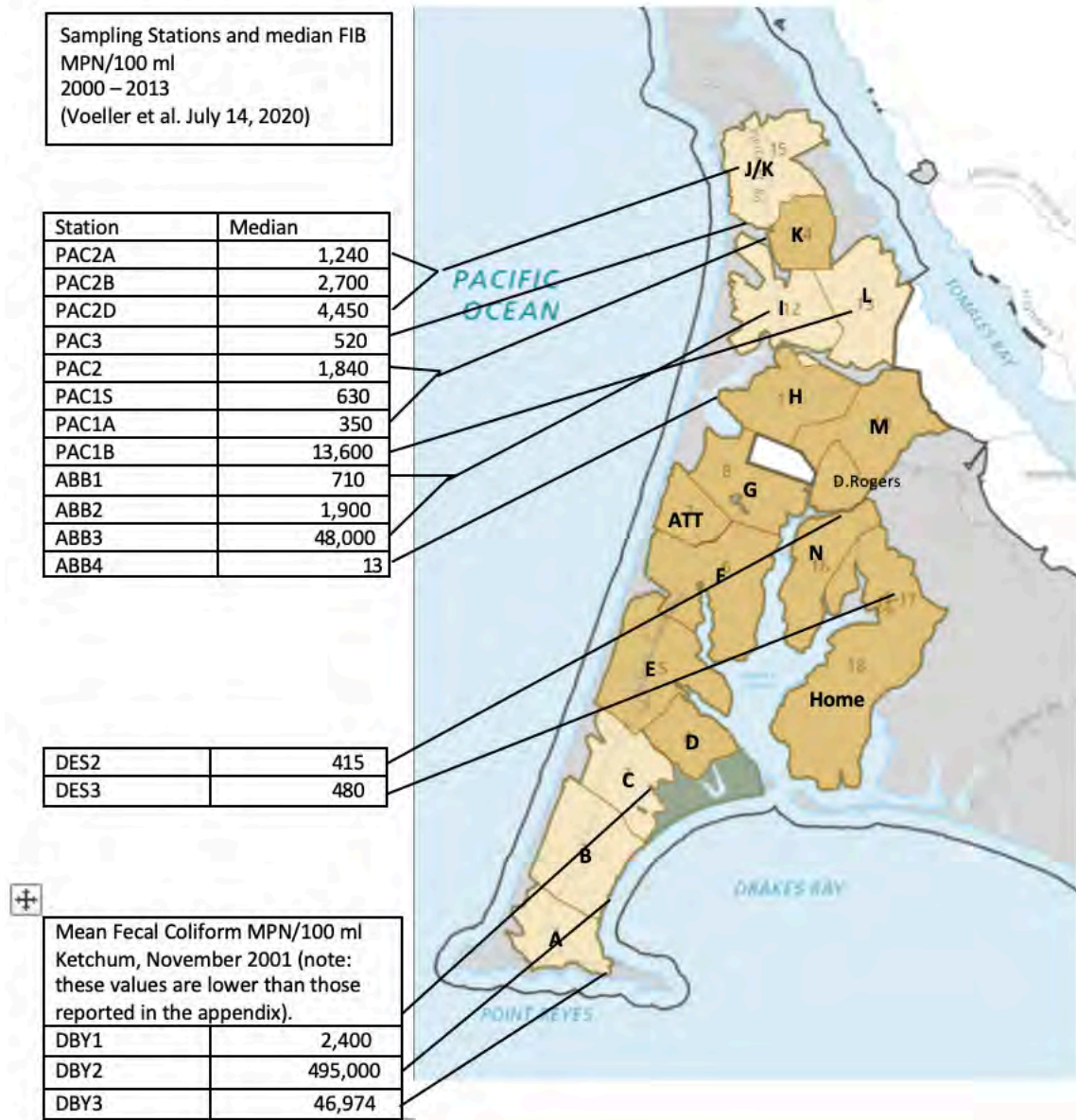


The National Park Service has had ample time to address these issues. Coastal Act consistency should not be considered until the NPS implements a multi-year water monitoring plan and takes the comprehensive corrective actions needed to ensure that coastal waters meet water quality standards for the 2.5 million citizens who visit the Point Reyes National Seashore each year.

Thank you for your consideration of this request.

Liz Dodge  
Berkeley, CA 94708

Figure 1 FECAL BACTERIA IN POINT REYES NATIONAL SEASHORE SURFACE WATER



**Fwd:** my letter to CCC for your critique

Lonna Richmond <lonnajeane@gmail.com>

Tue 12/1/2020 7:59 AM

**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

2 attachments (864 KB)

Screen Shot 2020-11-30 at 1.27.08 PM.png; Screen Shot 2020-11-30 at 1.28.13 PM.png;

01 December 2020

Dear California Coastal Commission Members,

I am a long-time resident in Marin County and a frequent visitor to PRNS.

I am trained as a botanist and worked for many years with Uplands Research Lab in Great Smoky Mountains National Park. Therefore I wanted to comment about how the The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act promises to protect natural resource areas from overuse (Section 30210) and according to the park's own assessment of the threatened and endangered plants (see list below) , the community association in Calfora.org shows nearly the whole list of plants would be impacted by cattle grazing in one way or another.

Coastal Prairie and Valley Grassland are the original native grassland communities in central California, but hugely impacted by cattle. North coastal scrub (commonly known as coyote bush) is mowed down and eliminated as nonpalatable to livestock on Point Reyes ranches, but it is a much richer plant community and contains many rare plants. Wetlands, riparian areas, vernal pools, and coastal salt marshes are grazed in parts, and most vernal pools have been completely eliminated in the ranching zone.

This is taken directly from the NPS.gov information and it completely conflicts with what the park is actually doing!

#### WHAT IS THE PARK DOING TO PROTECT THREATENED, RARE AND ENDANGERED PLANTS?

"While we humans have the ability to dramatically impact and even wipe out other species and their habitat, we also have the ability to preserve and protect these same species and their habitat. As habitat is lost to human development, protected areas like Point Reyes National Seashore are increasingly important to the protection and recovery of species that are on the verge of disappearing from our world.

Rare plant populations and their protection depend on us as conservationists and land stewards to take action. Their survival becomes entrusted to our care as land use values shift and these populations suffer from grazing pressure and the competition

non-native plant species. The fragile nature and fate of these organisms rests within our willingness and capacity to locate, map, monitor and protect these plants."

So in their own words, they are stating that grazing pressure and non-native plants (which are planted and grown as silage for the huge numbers of cows) are decimating the rare, endangered and threatened plant communities in this Park.

The writing is on the wall and there is no time like the present to start the restoration of PRNS by removing the cows, the ranches and the miles of fencing (that is a whole separate topic ) and begin to let nature repair itself. In this time of climate crisis, we need native plants that sequester carbon and we need to remove the methane and fecal matter producers that are fouling up our National Seashore.

Sincerely,

Lonna Richmond



<i>Abronia umbellata</i> ssp. <i>breviflora</i>	<i>Abronia umbellata</i> ssp. <i>breviflora</i>	Pink sand-verbena	NYCTAGINACEAE		18.1	
<i>Agrostis blasdalei</i>	<i>Agrostis blasdalei</i>	Blasdale's bent grass	POACEAE		18.2	
<i>Alopecurus aequalis</i> var. <i>sonomensis</i>	<i>Alopecurus aequalis</i> var. <i>sonomensis</i>	Sonoma alopecurus	POACEAE	FE (1997)	18.1	
<i>Arabis blepharophylla</i>	<i>Arabis blepharophylla</i>	Coast rock cress	BRASSICACEAE		4.3	
<i>Arctostaphylos virgata</i>	<i>Arctostaphylos virgata</i>	Marin manzanita	ERICACEAE		18.2	
<i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>	<i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>	Coastal marsh milkvetch	FABACEAE		18.2	
<i>Blennosperma nanum</i>	<i>Blennosperma nanum</i> var. <i>robustum</i>	Point Reyes blennosperma	ASTERACEAE		18.2	CR (1978)
<i>Calamagrostis stricta</i> ssp. <i>inexpansa</i>	<i>Calamagrostis crassiglumis</i>	Thurber's reed grass	POACEAE		2.1	
<i>Calystegia purpurata</i> ssp. <i>saxicola</i>	<i>Calystegia purpurata</i> ssp. <i>saxicola</i>	Coastal bluff morning-glory	CONVOLVULACEAE		18.2	
<i>Campanula californica</i>	<i>Campanula californica</i>	Swamp harebell	CAMPANULACEAE		18.2	
<i>Carex buxbaumii</i>	<i>Carex buxbaumii</i>	Buxbaum's sedge	CYPERACEAE		4.2	
<i>Castilleja affinis</i> ssp. <i>neglecta</i>	<i>Castilleja affinis</i> ssp. <i>neglecta</i>	Tibouon paintbrush	OROBANCHACEAE	FE (1995)	18.2	CT (1990) GOGA
<i>Castilleja ambigua</i> ssp. <i>humboldtensis</i>	<i>Castilleja ambigua</i> ssp. <i>humboldtensis</i>	Humboldt bay owl's clover	OROBANCHACEAE		18.2	
<i>Ceanothus gloriosus</i> var. <i>exalatus</i>	<i>Ceanothus gloriosus</i> var. <i>exalatus</i>	Glory bush	RHAMNACEAE		4.3	
<i>Ceanothus gloriosus</i> var. <i>gloriosus</i>	<i>Ceanothus gloriosus</i> var. <i>gloriosus</i>	Point Reyes ceanothus	RHAMNACEAE		4.3	
<i>Ceanothus gloriosus</i> var. <i>porrectus</i>	<i>Ceanothus gloriosus</i> var. <i>porrectus</i>	Mount Vision ceanothus	RHAMNACEAE		18.3	
<i>Ceanothus masonii</i>	<i>Ceanothus masonii</i>	Mason's ceanotos	RHAMNACEAE		18.2	
<i>Chloropyron maritimum</i> ssp. <i>palustre</i>	<i>Cordylanthus maritimum</i> ssp. <i>palustris</i>	Point Reyes birds' beak	OROBANCHACEAE		18.2	
<i>Chorizanthe cuspidata</i> var. <i>cuspidata</i>	<i>Chorizanthe cuspidata</i> var. <i>cuspidata</i>	San Francisco bay spineflower	POLYGONACEAE		18.2	
<i>Chorizanthe cuspidata</i> var. <i>villosa</i>	<i>Chorizanthe cuspidata</i> var. <i>villosa</i>	Wooly-headed Spineflower	POLYGONACEAE		18.2	
<i>Chorizanthe valida</i>	<i>Chorizanthe valida</i>	Sonoma spineflower	POLYGONACEAE	FE (1992)	18.1	CE(1990)
<i>Cicuta maculata</i> var. <i>bolanderi</i>	<i>Cicuta maculata</i> var. <i>bolanderi</i>	Bolander's water hemlock	APIACEAE		2.1	
<i>Cirsium andrewsii</i>	<i>Cirsium andrewsii</i>	Franciscan Thistle	ASTERACEAE		18.2	
<i>Elymus californicus</i>	<i>Elymus californicus</i>	California bottle-brush Grass	POACEAE		4.3	
<i>Erysimum franciscanum</i>	<i>Erysimum franciscanum</i>	San Francisco wallflower	BRASSICACEAE		4.2	
<i>Fritillaria lanceolata</i> var. <i>tristulii</i> <sup>2</sup>	<i>Fritillaria lanceolata</i> var. <i>tristulii</i>	Marin Checker Lily	LILIACEAE		18.1	
<i>Fritillaria liliacea</i>	<i>Fritillaria liliacea</i>	Fragrant fritillary	POLEMONIACEAE		18.2	
<i>Gilia capitata</i> ssp. <i>chamissonia</i>	<i>Gilia capitata</i> ssp. <i>chamissonia</i>	Blue coast gilia	POLEMONIACEAE		18.1	
<i>Gilia millefoliata</i>	<i>Gilia millefoliata</i>	Dark-eyed gilia	POLEMONIACEAE		18.2	
<i>Grindelia hirsutula</i> var. <i>maritima</i> <sup>2</sup>	<i>Grindelia hirsutula</i> var. <i>maritima</i>	San Francisco hairy gumplant	ASTERACEAE		3.2	
<i>Hesperexax sparsiflora</i> var. <i>brevifolia</i>	<i>Hesperexax sparsiflora</i> var. <i>brevifolia</i>	Short-leaved Evax	ASTERACEAE		18.2	
<i>Hesperolinon congestum</i>	<i>Hesperolinon congestum</i>	Marin western flax	LINACEAE	FT (1995)	18.1	CT (1992) GOGA
<i>Horkelia marinensis</i>	<i>Horkelia marinensis</i>	Point Reyes horkelia	ROSACEAE		18.2	
<i>Lasthenia californica</i> ssp. <i>macrantha</i>	<i>Lasthenia macrantha</i> ssp. <i>macrantha</i>	Perennial goldfields	ASTERACEAE		18.2	
<i>Layia carnosa</i>	<i>Layia carnosa</i>	Beach layia	ASTERACEAE	FE (1992)	18.1	CE (1990)
<i>Leptosiphon grandiflorus</i>	<i>Linanthus grandiflorus</i>	Large-flower leptosiphon	POLEMONIACEAE		4.2	
<i>Leptosiphon rosaceus</i>	<i>Linanthus rosaceus</i>	Rose leptosiphon	POLEMONIACEAE		18.1	
<i>Lilium maritimum</i>	<i>Lilium maritimum</i>	Coast lily	LILIACEAE		18.1	
<i>Limnanthes douglasii</i> ssp. <i>sulphurea</i>	<i>Limnanthes douglasii</i> ssp. <i>sulphurea</i>	Point Reyes meadowfoam	LIMNANTHACEAE		18.2	CE (1982)
<i>Hosackia gracilis</i>	<i>Lotus formosissimus</i>	Harlequin's lotus	FABACEAE		4.2	
<i>Lupinus tidestromii</i>	<i>Lupinus tidestromii</i>	Tidestrom's lupine	FABACEAE	FE (1992)	18.1	CE(1987)
<i>Microseris paludosa</i>	<i>Microseris paludosa</i>	Marsh microseris	ASTERACEAE		18.2	
<i>Monardella undulata</i>	<i>Monardella undulata</i>	Curly-leaved Monardella	LAMIACEAE		4.2	
<i>Perideridia gairdneri</i> var. <i>gairdneri</i>	<i>Perideridia gairdneri</i> var. <i>gairdneri</i>	Gairdner's yampah	APIACEAE		4.2	
<i>Phacelia insularis</i> var. <i>continentis</i>	<i>Phacelia insularis</i> var. <i>continentis</i>	North coast phacelia	BORAGINACEAE		18.2	
<i>Piperia elegans</i> ssp. <i>decurtata</i>	<i>Piperia elegans</i> ssp. <i>decurtata</i>	Point Reyes rein orchid	ORCHIDACEAE		18.1	
<i>Piperia michaelii</i>	<i>Piperia michaelii</i>	Michael's piperia	ORCHIDACEAE		4.2	

<i>Plagiobothrys diffusus</i>	<i>Plagiobothrys diffusus</i>	San Francisco popcornflower	BORAGINACEAE		18	CE (1979)
<i>Pleuropogon refractus</i>	<i>Pleuropogon refractus</i>	Nodding Semaphore Grass	POACEAE		4.2	
<i>Polygonum marinense</i>	<i>Polygonum marinense</i>	Marin knotweed	POLYGONACEAE		3.1	
<i>Ranunculus lobbii</i>	<i>Ranunculus lobbii</i>	Lobb's aquatic buttercup	RANUNCULACEAE		4.2	
<i>Sidalcea calycosa</i> ssp. <i>rhizomata</i>	<i>Sidalcea calycosa</i> ssp. <i>rhizomata</i>	Point Reyes checkerbloom	MALVACEAE		18.2	
<i>Stellaria littoralis</i>	<i>Stellaria littoralis</i>	Beach starwort	CARYOPHYLLACEAE		4.2	
<i>Streptanthus glandulosus</i> ssp. <i>pulchellus</i>	<i>Streptanthus glandulosus</i> ssp. <i>pulchellus</i>	Mt. Tamalpais jewel-flower	BRASSICACEAE		18.2	GOGA
<i>Triphysaria floribunda</i>	<i>Triphysaria floribunda</i>	San Francisco owl's clover	OROBANCHACEAE		18.2	

<sup>1</sup> Names follow The Jepson Manual (Baldwin et al. 2012) unless otherwise noted<sup>2</sup> Variety recognized by CNPS, but not The Jepson Manual (2012)**Federal and State Status Key:**

FE= Listed as Endangered  
 FT= Listed as Threatened  
 CE = Listed as Endangered  
 CT = Listed as Threatened  
 CR = Listed as Rare

**California Native Plant Society (CNPS) Ranking System:**

List 1A = Plants presumed extinct in California  
 List 1B = Plants rare, threatened, or endangered in California and elsewhere  
 List 2 = Plants rare, threatened, or endangered in California, but more common elsewhere  
 List 3 = Plants about which we need more information - a "review" list  
 List 4 = Plants of limited distribution - a "watch" list

For more information visit

<http://www.cnps.org/cnps/rareplants/ranking.php>**Threat Ranks**

0.1 - Seriously threatened in California (over 80% of occurrences threatened/ high degree and immediacy of threat)  
 0.2 - Fairly threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)  
 0.3 -Not very threatened in California (<20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

This list is for educational purposes only.

Last updated 3/26/2012. Changes will be made as we discover new information about threatened, rare, and endangered plants. Check our web site periodically for updated lists.



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Schluter, M. et al. 2012. New horizons for managing the environment: a review of coupled social–ecological systems modeling. *Natural Resource Modeling* 25:219–272.

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Van Schmidt, N. D., T. Kovach, A. M. Kilpatrick, J. L. Oviedo, L. Huntsinger, T. Hruska, N. L. Miller, and S. R. Beissinger. 2019. Integrating social and ecological data to model metapopulation dynamics in coupled human and natural systems. *Ecology* 100(6): e02711. 10.1002/ecy.2711

## Point Reyes General Plan Amendment Proposal

Janet Ewing <jaewing@comcast.net>

Tue 12/1/2020 8:42 AM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Staff of the California Coastal Commission,

Recently I learned that in January you are slated to decide on the amendment that would allow cattle and dairy ranching to continue on the lands that were acquired so many decades ago to establish Point Reyes National Seashore Park. I'm old enough to remember the struggle that led to our parks foundation, as I visited there in the 60's, staying in a cabin that was slated to be removed. This removal was to allow that area to be able to return to its natural state, and thus benefit all of us future visitors. I understood at that time that some of the areas of ranching were being allowed to persist with the understanding that at the death of the owners, that area would also get to return to its wildness. Apparently now there has been enough pressure from them and their allies for this amendment to be proposed. What a shame.

A shame because Point Reyes is a national treasure because of its unique beauty and ecology. It is heavily visited, and even more so in Covid times. And I think most of us who visit are there because it gives us the opportunity to hike and camp in an extraordinary and unique place. We go there to see the birds, the elk, the ocean, the cliffs, the forests etc not cattle and their overgrazed pastures. Us urban dwellers are enjoying the solace that the natural landscape provides, its native state.

I think you should stick to the original use plan. Resist these efforts to commercialize our national park by allowing the continuation of cattle grazing and additional truck farming. Marin and Sonoma have plenty of other places where these are practiced and the public can visit. Tomales Bay, Inverness and the Point Reyes Station area are all lovely and enjoyed by many. But they offer a different experience for the visitor. They obviously aren't "wild". Point Reyes should be allowed to get to expand its wildness, as was originally planned, for the benefit of us all. Allowing this plan to continue would truly be to carry out your duty to we, the people.

Thank you, from a long time and frequent visitor,

Janet Ewing  
1182 Euclid Ave  
Berkeley, CA 94708

## Proposed changes to the Point Reyes National Seashore

PATRICIA BRUENS <pbruens@comcast.net>

Mon 11/30/2020 8:36 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

TO: the California Coastal Commission:

In my opinion the Point Reyes National Seashore General Plan amendment does not conform to the California Coast Act because it fails to protect or enhance this area of the coast. It does not protect its scenic qualities because overgrazed, eroded and fenced off pasture is not scenic. It would allow further degradation of its waterways damaging the marine environment due to manure contamination and erosion. And most importantly it fences off wide areas of the park by blocking access to miles of ocean bluffs.

I have been hiking and camping in the park for years and am acutely aware of changes to the natural habitat as they occur. Every year the trails and parking lots are more crowded. Most people come to Point Reyes hoping to find wilderness and nature. We do not need to see more calves in veal pens, hundreds of miles of fencing, supposedly historic farm buildings as well as eroded and overgrazed fields. We want and need more hiking trails. Parking lots are often overflowing. Backcountry campgrounds are booked up every weekend. We want and need more campgrounds, not farm stand parking lots. We want to see wild animals in their natural habitat, not cows and the proposed pigs and sheep in pens, fed with trucked in hay, row crops being irrigated and fertilized with compost brought in from elsewhere.

There are plenty of places in the adjacent Marin and Sonoma countryside to see what actually appear to be historic farms and to buy locally sourced products. But how rare is the opportunity to restore degraded pastureland and make it accessible to us, the public? There were much better alternatives to the one being shoved down our throats by the NPS, ones which would be consistent with the mission of the California Coastal Commission.

When asked for input last summer over 90 percent of respondents supported eliminating the historic ranches. I was unaware of what was going on at the time, and therefore did not participate during the public comment period. I am sure there are many more like me, who once educated, became upset about what the National Park is planning to do. As more people become aware there will be a lot of anger if this is allowed to transpire. The fact that our tax dollars are being used to subsidize these ranches and dairies thus degrading the park will explode into fury as many will find out after the fact if you allow this to come to pass. However, the elected officials responsible for this travesty will pay for it as we support their political opponents.

The National Seashore needs to have public access enhanced, its scenic views preserved, and its environmentally sensitive habitat protected. The proposed General Plan amendment is not consistent with these goals.

Thank you,

Patricia K. Bruens

79 Hillside drive

Fairfax, California

## **Pt.Reyes General Plan amendment**

buck crowley <buckcrowley@hotmail.com>

Mon 11/30/2020 7:17 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Staff of the California Coastal Commission,

The Pt Reyes National Seashore General Plan preferred amendment is inconsistent with the California Coast Act. In fact, it seems like it is promoting the opposite of the intension of the law. The scenic qualities are being damaged by the sight of eroded, overgrazed, manure covered pastures. Miles of fencing destroy the vistas of the ocean bluffs. Water quality is being damaged by e coli contaminants secondary to manure and cattle intrusion into waterways, affecting the marine environment. The hundreds of miles of fencing block access to ocean bluffs.

I brought my children to Pt Reyes almost every weekend of their early lives, and now that I have more free time I visit there almost as often. I have witnessed first hand how many more visitors come to the National Seashore every year. People I talk to when I am there are excited about seeing elk, birds, bobcats, the Chimney Rock wildflowers. No one has ever oohed and ahed over the cattle, dairy cows, unsightly farms.

Back packing is very popular at the Park, but it is rare that I have found an open spot on a weekend. More campgrounds would be an excellent addition to the Park. Trails are becoming more crowded, parking lots are often full. I and many others would love to have new trails to explore. With population continuing to grow so will the demands on our public lands. What is needed are more recreation areas, and supporting this would be consistent with the California Coastal Act.

The farms and ranches of Pt. Reyes are already being subsidized by getting discounted leases, assistance with fencing, roads and building maintenance. If they are still having financial difficulties, then the answer is not to reward them by allowing them to commercialize what by all rights belongs to the general public.

Please advise commissioners to reject this amendment to the general plan.

Thank you,

Buck Crowley  
Petaluma CA  
707-765-9410



## decision on Point Reyes

rp.hoffman <rp.hoffman@comcast.net>

Mon 11/30/2020 4:24 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc:

- Ewing Eberle <eberle16@comcast.net>

I have been a frequent visitor to Point Reyes National Seashore for over 40 years. It has always been my understanding that the private ranches that were present on the seashore land were scheduled to be removed after the current owners died. It was also noted that the properties would not be inherited ad infinitum by the heirs to the property. The recent plans by the NPS to extend the leases and to allow additional development is completely contrary to the original California Coast Act. There is little open space comparable to Point Reyes in the Bay Area and it is a resource used extensively by thousands each year. To view fences and cattle as opposed to pristine native flora and fauna would be a huge loss.

I was not aware of the initial comment period but understand the coastal commission will be making a final decision by December 10. With few resources in the Bay Area such as Point Reyes National Seashore it would be truly a shame to blight the landscape such a change would bring. I encourage the Coastal Commission to deny the changes proposed in the General Plan amendment.

Thank you for your attention,

Robert P. Hoffman MD  
1182 Euclid Ave.  
Berkeley, Ca. 94708

**Pt. Reyes General Plan Amendment proposal**

EBERLE EWING &lt;eberle16@comcast.net&gt;

Mon 11/30/2020 3:19 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Staff of the California Coastal Commission:

The Pt Reyes National Seashore General Plan amendment is inconsistent with the California Coast Act because it fails to protect let alone enhance this area of the coast in any way, shape or form. Specifically, it does not protect its scenic qualities; overgrazed, eroded and fenced off pasture is not pretty. It would allow further degradation of its waterways damaging the marine environment due to manure contamination and erosion. It further fences off wide swaths of the park, blocking access to miles of ocean bluffs.

I have been visiting the National Seashore on average once a week for over 30 years, so roughly 1500 trips, so I consider myself something of an expert on conditions there. Every year the trails and parking lots are more crowded. Most people come to Pt Reyes hoping to find wildness and nature. They want to visit more areas like Chimney Rock, one of the few places to see untrammelled prairie, covered with native plants and flowers. We do not need to see more calves in veal pens, hundreds of miles of fencing, decidedly non historic farm buildings, eroded and overgrazed fields. We want and need more hiking trails. Parking lots are often overflowing. Back country campgrounds are booked up every weekend. We want and need more campgrounds, not farm stand parking lots. We want to see wild animals in their natural habitat, not cows and the proposed pigs and sheep in pens, fed with trucked in hay, row crops being irrigated and fertilized with compost brought in from elsewhere.

There are plenty of places in the adjacent Sonoma and Marin countryside to see what actually appear to be historic farms and buy locally sourced products. But how rare is the opportunity to restore degraded pasture land and make it accessible to its true owners, the public? There were much better alternatives to the one "preferred" by the NPS, ones which would be consistent with the mission of the California Coastal Commission.

When asked for input last summer over 90 percent of respondents supported eliminating the "historic" ranches. I was woefully ignorant about what was going on at the time, so did not participate during the public comment period. I am sure there are many more like me, who once educated, became horrified about what the National Park is planning to do. Once more people become aware there will be great dismay if this is allowed to transpire. They will be angry, as I am, that my tax dollars are being used to subsidize these ranches and dairies.

The National Seashore needs to have public access enhanced, its scenic views preserved, and its environmentally sensitive habitat protected. The proposed General Plan amendment is not consistent with these goals.

Please advise the Commissioners to reject these proposed changes to the General Plan. As David Attenborough notes, it is not too late to begin rewilding the planet.

Thank you,

Eberle Ewing  
330 English St.  
Petaluma CA 94952

**Theresa Harlan, [tharlantiger@comcast.net](mailto:tharlantiger@comcast.net)**

137 Stonewalk Ct  
Vallejo, CA 94589

November 25, 2020

I urge the California Coastal Commission (CCC) to be aware of the absence of Coast Miwok history, culture and contributions in Point Reyes National Seashore/National Park Service (NPS) planning, dedicated lands, and resources. There is minimal effort to share the historic and cultural significance of Coast Miwok people with the public and to protect archeological and sacred sites for future generations. Coast Miwok homelands are part of the NPS and the north district of the Golden Gate National Recreation Area (GGNRA). As you review and consider signing the Consistency Determination, consider if the NPS General Management Plan (GMP) Amendment for the Point Reyes National Seashore/GGNRA north district meets the CCC's Environmental Justice Policy.

I retired from the California Department of Public Health and am well familiar with the significant meaning of duty and service to the public. My mother was Elizabeth Campigli Harlan, who was the daughter of Bertha Felix Campigli born at Laird's Landing in 1882. Bertha was the granddaughter of Euphrasia (Coast Miwok) and Domingo Felix (Filipino). Bertha and her sister Perfecta Felix each lived in homes built by their grandfather on neighboring coves at Tomales Bay. Upon the death of Bertha in 1949, my mother's family was forced out of their home at Laird's Landing by a neighboring rancher, S.A. Turney, who falsely claimed that the home and 15 acres was his and not that of my family. Bertha's son Victor Sousa contested this claim in court, but lost because my family had no tax records or written documents supporting ownership. Oral testimonies that my family lived at the cove before California was a state carried no weight in court. My family received no compensation when the Park purchased land from the ranchers (for more information see *Point Reyes Light*, Vol II, No 1, Spring 1990).

Visitors to the Park can walk through the historic Pierce Point Ranch. There is no marker for my family's home place and homeland or other Coast Miwok families. No visitor at the Park, will know of my family's or other families' rich life of living with the land, fishing on the Bay, gathering berries, digging for clams, gathering oysters and abalone or preparing wild game. They will not know that Coast Miwok people kept homes with gardens and worked at the ranches. They will not know of the friendships between Coast Miwok, Mexican, and Anglo-American families living at the Bay.

They will not know of the well organized and structured fishing villages and clam processing areas that existed over 10 thousand years ago or remaining archeological sites. They will not know of the tenacious survival of Coast Miwok people who persisted despite catastrophic change from the Spanish,

Mexican and American occupations of their homelands. Instead visitors will walk away with an awareness of Anglo American dairy ranches with a recent history reported to begin with a land purchase in 1858.

The NPS does not give equitable attention and resources to the Coast Miwok people, the original people, or their history and contributions. The small 1.5

**Harlan**, November 25, 2020, page 2

acre area of Kule Loko and roundhouse at the Park is important, but cannot tell the full story of Coast Miwok people who lived at Tomales Bay. NPS/GGNRA north district lands are still Coast Miwok ancestral homelands and home to my family. When I visit my mom's ancestral home with my cousins it can feel as if we are on private dairy ranches as we drive past cows on dirt roads. We are not on private land, we are ancestral homelands and now public lands.

In 2017 the NPS convened a meeting with my family and representatives of the Federated Indians of Graton Rancheria to discuss historic preservation plans for my family's home and land. The NPS stated they would restore the home and buildings to the 1940s era when my mother and grandparents lived at the cove. I shared family photographs with the NPS to assist them with their restoration work. NPS started and stopped work in that same year. Since then my repeated attempts via email and telephone to request updates are left unanswered.

I am fearful that the NPS no longer intends to dedicate the house and land or document my family's history at Laird's Landing. The stories and memories of my family at Tomales Bay may end with my generation.

The opportunity and promise to the public of access to public lands at Point Reyes National Seashore and GGNRA by the NPS is just that, a promise. It is an empty promise that is no different from disregarded treaty agreements by the federal government with indigenous people throughout the United States.

I ask:

- Why is a 100-year-plus dairy ranching history more valuable than a Coast Miwok history of over 10 thousand years?
- When will there be an equitable representation and stewardship of Coast Miwok history, culture, and sacred sites by the NPS?
- What will it take for the NPS to stop fencing off nearly 30,000 acres of public land for private use for a few well-connected dairy ranchers?
- When will the NPS diversify their staff and seek visitors reflective of the diversity of the local San Francisco Bay Area and American population?

Theresa Harlan



**From:** james.coda@comcast.net <james.coda@comcast.net>  
**Sent:** Tuesday, November 24, 2020 12:59 PM  
**To:** Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>  
**Subject:** RE: Point Reyes GMPA/EIS Consistency Determination Submittal

Hi Larry,

It looks like I never sent you the response I finally got from the SFRWQCB on September 29, 2020. It is attached. The board didn't respond to any of the points I made in my June 10, 2020, letter, or in my June 29 addendum to that letter, regarding water pollution at Point Reyes National Seashore and Golden Gate National Recreation Area.

On July 14, 2020, NPS completed a paper entitled "Improved water quality in coastal watersheds at Point Reyes National Seashore associated with rangeland best management practices, 2000-2013." It is Exhibit L to the FEIS. It was written by three NPS employees at Point Reyes Seashore. The first listed author is Dylan Voeller who is in charge of the ranching program at Point Reyes and Golden Gate.

As indicated by the title, the authors claim conditions are better nowadays thanks to BMPs. Not from what I have read and seen. Furthermore, the authors only address fecal indicator bacteria and, very briefly, turbidity. They don't address other water quality parameters such as dissolved oxygen, nitrogen and phosphorus.

Jim

**From:** Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>  
**Sent:** Wednesday, November 4, 2020 1:06 PM  
**To:** james.coda@comcast.net  
**Subject:** Re: Point Reyes GMPA/EIS Consistency Determination Submittal

Hi Jim,

You are correct. Special hearing just for CD-0006-20 (NPS, Point Reyes GMPA) on Thursday January 14. As to the time allocated, the meeting will start at 9am and last as long as it takes. I'm figuring we'll go all day.

Larry

Larry Simon  
Manager, Federal Consistency Unit  
Energy, Ocean Resources and  
Federal Consistency Division

**From:** <barbmottl59@everyactioncustom.com>  
**Sent on:** Thursday, November 19, 2020 4:30:05 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** It's the public's park — Choose Alternative F

Dear John Weber,

I'm stunned at the National Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore. Why is the designation of commercial agriculture the park's main use? Shouldn't it's main use be to preserve the park and it's native wildlife for the public? Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit. I'm asking you to do everything in your power to stop this plan.

The native tule elk are an iconic part of the natural landscape at Point Reyes and are the only tule elk herds within the national park system. There's no ecological justification or valid management reason for harassing, fencing or shooting elk in the park. Commercial lease holders on our public lands shouldn't be dictating policies that persecute the park's wildlife.

Alternative B doesn't manage commercial ranching leases to accommodate elk or other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil and native vegetation. Instead it sets a horrible precedent by expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
Barbara Mottl  
Dousman, WI 53118  
barbmottl59@gmail.com

**From:** <pbirkeland@everyactioncustom.com>  
**Sent on:** Thursday, November 19, 2020 4:25:42 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Don't Manage Pt. Reyes for Agricultural Profit

Dear John Weber,

I am totally outraged that you are proceeding with a plan to introduce MORE agriculture and domestic farm animals to our Point Reyes National Seashore. There is so much there to preserve, and with climate breakdown happening as we speak, it will take very bit of support we have to maintain the existing ecosystems, ecosystems that ultimately support us.

The Point Reyes Tule Elk are a national treasure. I am disgusted with your plan to shoot them to reduce their impact on agricultural profits. We should be working toward phasing out agriculture and cattle at Point Reyes. How dare you destroy what we as a nation have worked so hard to preserve!

Let me be clear: Reject Alternative B and instead approve Alternative F. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
Paul Birkeland  
Seattle, WA 98115  
pbirkeland@seanet.com

**From:** Marilyn Fuss <marilynfuss6@gmail.com>  
**Sent:** Thursday, November 19, 2020 1:02 PM  
**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>  
**Subject:** PLEASE READ AT MEETING

Pt. Reyes is an ecosystem unique in California. It needs to be coddled and tended to. Please take the cows and their companies elsewhere, over next couple of years. Thanks very much.

Marilyn Fuss  
environmentally concerned citizen  
Los Angeles  
323-573-2587

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**Memorandum**

**Date:** 16 November 2020

**To:** John Weber, ED, California Coastal Commission <John.weber@coastal.ca.gov>

**From:** Jules Evens, Principal, Avocet Research Associates, LLC

**CC:** [PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov); [Ryan\\_olah@few.gov](mailto:Ryan_olah@few.gov); [Carey\\_feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)

**Re:** The Point Reyes National Seashore General Management Plan Amendment and a plea for ecologically sound management of federal lands.

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As a 40-year resident of West Marin, a former board member of the Point Reyes National Seashore Association, the author of *"The Natural History of the Point Reyes Peninsula"* (PRNSA 1988, 1993 and University of California Press 2008), and a certified wildlife biologist (see permits cited in the signature, below) who has conducted wildlife studies within the Seashore for several decades, I am writing to voice my disappointment with the focus and intent of the Draft General Management Plan Amendment and Environmental Impact Statement (GMPA) on the impacts of commercial ranching at Point Reyes National Seashore (PRNS) and Golden Gate National Recreation Area (GGNRA). Although the Biological Assessment covers potential impacts to many of the sensitive park resources, none of the alternatives in GMPA offer protection of natural resources or effective opportunities to manage the Park lands to promote ecological health. In its present iteration, this GMPA presents Hobson's choice to the public, favoring ranching interests over preservation of natural resources and ecological diversity.

Examples of ecological degradation that will result from the Preferred Alternative (or frankly any of the alternatives) are too numerous to address in these comments. I will focus on just two native species—Tule Elk and Western Snowy Plover—that exemplify my concerns

#### I. TULE ELK vs BOVINE SUBSIDIES

I oppose the proposal to remove or diminish the Tule Elk that is contemplated by the Plan. Of primary concern is "Alternative B," which fails to provide any measures for the protection or restoration of natural resources and native wildlife habitat within the Seashore. (GGNRA managed lands, that is those south of the Bolinas-Fairfax Road, are free of livestock-NPS, pers. comm.)

Native coastal prairie at Point Reyes developed and evolved under light-grazing pressure by native Tule Elk that tended to roam seasonally from area to area, minimizing the intensity of their impact to the native plant communities. The shift from elk to cattle that accompanied European colonization of the peninsula changed the pattern of grazing from seasonal to year-round, increasing the grazing pressure and favoring a shift from coastal prairie, dominated by perennial graminoids and forbs, to rangeland dominated by annual grasses.<sup>1</sup>

<sup>1</sup> A study of three grassland plots near North Beach found that removal of cattle caused a successional change in favor of native perennial grasses and a decrease in introduced annuals (Elliot and Wehausen 1974).



Currently there are 2,400 beef cattle and 3,315 dairy cattle (total = 5,715) on 28,000 acres covered in the GMPA. This compares with 730 Tule Elk (Pers. comm. NPS, latest census 2019), therefore elk comprise approx. 11 percent of ungulates in the Park (excluding mule deer). The Tule Elk is an iconic species on the Point Reyes Peninsula. I've led many natural history trips to the Seashore over the years, attended by people from all over North America and the world. Among the favorite sites to visit are Drake's Beach and Limantour Estero. Inevitably, encounters with the free-ranging elk in those locations are considered high points of the day by Park visitors. The reintroduction and protection of those herds provides an object lesson, a testament, to the Park's commitment to fostering and repatriating native species within public lands. Often our group will proceed from those sites to the Outer Point. Along the way we pass the overgrazed and degraded landscapes surrounding some of the dairy ranches, particularly ranches A and B. Here, when asked, I am often at a loss to explain the rationale behind the Park's management of those landscapes—the scarred ground, the decrepit buildings, the fetid barnyards and barren feed lots. Clearly, these lands are not managed for natural resources or ecological integrity, rather as businesses subsidized by the taxpayer/landowner. Frankly, I have to admit to our guests that although ranchers accepted payment for their ranches and receive public subsidies under the Park's auspices, they vigorously resist landuse management constraints, and get away with it, always with the consent of politicians and government officials. This despite the fact that the Park Service is mandated to manage Point Reyes National Seashore “without impairing its natural values and for the maximum protection, restoration and preservation of the local natural environment.”

## II. SNOWY PLOVER SURVIVAL vs RAVEN SUBSIDIES.

There has been a tremendous investment in protecting the federally threatened Western Snowy Plover at Point Reyes. The Park has devoted hundreds of thousands of dollars public funds (approx. \$65,000/year over the last 3-4 years) and approx. 470 volunteer hours/year toward plover protection since the project began in 1986. Among several recommendations in the Snowy Plover Management Plan (Hornaday et al. 2007) is: “Manage breeding and wintering habitat of the Pacific coast population of the western snowy plover to ameliorate or eliminate threats and maximize survival and productivity.” The Plover Management Plan estimates that recovery (projected date 2047) will cost \$149,946,000 “plus additional costs that cannot be estimated.” It is the responsibility of the Park and other public agencies to implement this Plan and foster plover recovery.

Common Ravens (*Corvus corax*) are a primary predator of plover nests (Hornaday et al. 2007, [PORE website](#)). The open feed lots and barnyards on the Point Reyes Peninsula in effect subsidize and propagate the local population of ravens. (Also attracts and subsidizes other mesopredators-raccoons, foxes, skunks, etc.).

*Ravens have consistently been the most significant nest predator at Point Reyes, accounting for 69 percent of all predation events over 5 years and destroying approximately 50 percent of nests* (Hickey et al. 1995). ([Snowy Plover Management Plan](#) p. 49).

Hatching success has improved with the seasonal construction of exclosures around nest sites, an admirable effort by Park resource managers that requires a significant investment of public funds, staff hours, and volunteer dedication. The GMPA mentions the raven issue under “Environmental Consequences” and asserts that “NPS has coordinated with ranchers to limit raven access to supplemental feed and shelter . . . and worked with ranchers to install covered feed bins” (p. 102), however the implementation and/or efficacy of this effort is not apparent or credible (see attached photograph). The GMPA discusses mitigating subsidy of the raven population by “agricultural diversification” with NPS working “in coordination with ranchers, would continue to take actions to reduce feeding opportunities for ravens at ranches and dairies, such as covering feed troughs, cleaning up waste grain around troughs, removing and placing troughs in enclosed structures, and storing harvested crops in enclosed structures” (p. 143).

It is not clear to this frequent park visitor that any such action has actually been taken or will be taken in the future.



Figure 1. Twenty-four Common Ravens attracted to a feedlot at B-Ranch, August 24, 2019. (Another dozen or more birds were roosted on fencing in the periphery.) Even larger concentrations of 75-100 ravens were noted in Aug 2019 at I-Ranch pastures (M.A. Flett, pers. comm.), although no photographs are available.

The Biological Assessment (BA) is replete with comments on adverse impacts of ranching practices at Point Reyes on the Western Snowy Plover:

*Of particular concern is the indirect effect of raven predation on nesting snowy plovers because increased numbers of common ravens in the action area have been attributed to food subsidies from beef cattle and dairy ranching practices (Kelly et al. 2002; Roth et al. 2004). Kelly (2001) reported that the highest numbers of ravens occurred near dairy ranches in the action area. (BA p. 50).*

*USFWS (2002b) finds “an increase in the number of ravens as result of ranching activities likely could lead to higher levels of predation on western snowy plovers by these corvids. Ongoing research has documented the interrelationship between ranching activities and ravens. Specifically, ravens opportunistically feed upon left over grains, afterbirths, carcasses, and organisms killed or injured during silage harvest.” (BA p. 50)*

*Ranch management activities in the action area could pose a risk to western snowy plovers by supporting higher numbers of predatory species, especially common ravens that prey upon snowy plover eggs and chicks. (BA p. 78)*

*Over the long term, nesting western snowy plovers could be indirectly affected due to predation from ravens. In spite of avoidance, minimization, and mitigation measures that could reduce this adverse indirect impact, continued ranching in the action area “may affect, is likely to adversely affect” the western snowy plover. (BA p. 79)*

The 2019 plover nesting effort at Point Reyes provides a dire and instructive example of the situation: *Common ravens have also caused an unusual number of snowy plover nest failures so far this season. Of the 14 nests, eight have failed; of these eight failed nests, six were preyed upon by common ravens (75%).* ([NPS website](#), accessed 13 Sept. 2019)

Although adverse consequences of current ranching practices on plover reproductive success are explicitly stated in the BA, the alternatives provide no solution other than vague statements about the Park “working with ranchers.” The plover-raven issue is just one example of the failure to protect, preserve and foster natural resources within the Park by the alternatives outlined in the GMPA. Indeed, if any of the alternatives contemplated in the GMPA are pursued, the Park management will continue to work at cross-purposes with plover protection (and that of other natural resources). (One exception in Alternative F, that relies on protection by default.)

The National Park Service asserts that the GMPA is consistent with the Coastal Act; this is not accurate. The forementioned impacts offer several examples (among many) in which the Alternatives contemplated are not reconcilable with protection of natural resources within the Coastal Zone. The Coastal Act policies (Division 20 of the Public Resources Code) require “terrestrial and marine habitat protection.” Clearly, current ranching practices within the Point Reyes National Seashore have detrimental impacts on the Coastal Zone over which the Coastal Commission has jurisdiction and the responsibility of protection “for present and future generations.”<sup>2</sup>

Admittedly, we live in Orwellian times, but the flagrant disregard for the integrity of the landscape and the conspicuous debasement of our natural resources under the current Park management (Alternative A) is unconscionable. The proposed alternatives will serve to perpetuate that trend. At a time when public lands are being sacrificed to private commercial extractive interests nationally, it is disheartening to see the NPS succumb to political pressure and sacrifice ecological diversity to private agricultural interests on public lands.

The GMPA should strive to strengthen the intent of the Park’s mandate (“restoration and preservation”) rather than further degrade the natural environment as Alternates A, B, and C would demonstrably do; these are inimical to the restoration and preservation of the Park’s natural resources.

*Where cessation of grazing occurs on lands under alternatives D and F, Impacts on wildlife related to dairy and beef ranching would cease, including disturbance, trampling, erosion, and nutrient inputs . . . Alternatives E and F would eliminate impacts of forage production, manure spreading, and diversification would reduce high-intensity-use areas compared to existing conditions. (GMPA, vii).*

Alternative D would be a small step toward preservation by reducing the acreage degraded by cattle grazing. (Also, greenhouse emissions.) Alternative E represents a minor improvement over current practices, but because it continues cattle grazing at essentially current levels, it will continue to have adverse impacts on the landscape. None of the alternatives provide ecologically sound or sustainable stewardship options, nor do they focus on avoidance of impairment of the Park’s natural values or on “maximum protection, restoration and preservation of the local natural environment.” Given the choices available to the public, to the actual owners of the land, Alternative F, though not ideal, is the Hobson’s choice preferred by this citizen.

<sup>2</sup> <https://www.coastal.ca.gov/whoweare.html>

Should any of the proposed alternatives be implemented that perpetuate, expand, or change agricultural practices within the Park, NPS resource managers should consider modeling of “coupled human and natural systems” (CHANS). Achieving sustainable CHANS requires an integrated systems approach to avoid unforeseen negative consequences. There is a robust literature on such “coupled” systems (Alberti et al. 2011, Kramer et al. 2017, Liu et al. 2015, Schluter et al. 2015, Schouten et al. 2013, Schreinemachers and Berger 2011, Van Schmidt et al. 2019).

A timely new book, “This Land” by Christopher Ketchum (2019) documents “the destructive behavior of welfare ranchers who graze their cattle on public lands at the public expense with the complicity of government agencies whose mandate it is [was?] to protect those lands for future generations.” The book describes “a broken system leading to a broken ecosystem.” If the alternatives contemplated by the GMPA are put into action, it will follow a familiar and tragic pattern of abuse of the Public Trust and provide another chapter for the sequel to this important book.

One caveat: Although I complain harshly about current conditions of the “pastoral zone” of the Park, I know and respect the resource management team that has been assembled at Point Reyes over the past twenty years, largely to the credit of Superintendents Don Neubacher and Cicely Muldoon. This team of land managers has worked assiduously (when and where allowed), to manage the natural resources with professionalism and ecological good sense, only to be undermined by some governing agencies.

Respectfully submitted—with concern, disappointment, and outrage—in honor of those fought to protect this “Island in Time.”



Jules Evens

P.O. Box 839, Point Reyes Station, CA 94956 Telephone: 415/706-3318  
<avocetra@gmail.com>

U.S. Fish and Wildlife Endangered Species Permit: TE 786728-5  
California Department of Fish and Game Collecting Permit # 801092-04  
Federal Bird Marking and Salvage Permit: # 09316-AN

## References

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[http://ecos.fws.gov/docs/recovery\\_plan/070924\\_2.pdf](http://ecos.fws.gov/docs/recovery_plan/070924_2.pdf) (accessed on 17 September 2017). (2,677 KB PDF)
- Kramer, D., J. Hartter, A. Boag, M. Jain, K. Stevens, K. Nicholas, W. McConnell, and J. Liu. 2017. Top 40 questions in coupled human and natural systems (CHANS) research. *Ecology and Society* 22:44.

## Point Reyes National Park

hkfauss@gmail.com <hkfauss@gmail.com>

Sat 11/14/2020 6:45 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

I am writing re the management plan recommended by the National Park Service for Point Reyes. I believe that it is inconsistent with Coastal Zone Management Programs. At present the entire Park is dominated by cattle, which pollute not only streams and springs on the land, but polluting runoff extends into the ocean causing harm to plants and animals dependent on clean ocean water. The visitor to Pt Reyes is struck by contrasts between land untouched by cattle ranches and native habitat, dense with native plants and animals. Yosemite banned sheep grazing, which had historically been part of its heritage. No other national park has an ecosystem so adversely impacted by commercial interests as ours. For a third of Pt Reyes to be dedicated to cattle resulting in destruction of the land and ocean environments is shameful. Hopefully, your agency, entrusted with protecting the coastal lands of California, will take action against these destructive commercial interests.

Respectfully,

Helen Fauss  
Fairfax, CA



**From:** <grace3garcia@everyactioncustom.com>  
**Sent on:** Saturday, November 14, 2020 3:45:31 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Save the Tule Elk

Dear John Weber,

I strongly object to the National Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore. I oppose the killing of native wildlife and the designation of commercial agriculture as the park's main use. Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit. I'm asking you to do everything in your power to stop this plan.

The native tule elk are an iconic part of the natural landscape at Point Reyes and are the only tule elk herds within the national park system. There's no ecological justification or valid management reason for harassing, fencing or shooting elk in the park. Commercial lease holders on our public lands shouldn't be dictating policies that persecute the park's wildlife.

Alternative B doesn't manage commercial ranching leases to accommodate elk or other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil and native vegetation. Instead it sets a horrible precedent by expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
Grace Garcia  
Corte Madera, CA 94925  
grace3garcia@gmail.com

## **Tule Elk**

Nelson Max <max@cs.ucdavis.edu>

Fri 11/13/2020 6:22 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

I just heard that there is a plan to allow killing wild tule elk on Point Reyes National Seashore, that might interfere with ranching. I am not opposed to dual use of such land for wildlife habitat and ranching, but I am opposed to policies that favor ranching over wildlife. There are too few places on earth where wildlife has free roam, and this National Seashore should remain one of them. Visitors also enjoy seeing these elk.

**From:** <cathy.smotherman@everyactioncustom.com>  
**Sent on:** Friday, November 13, 2020 5:18:35 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Please Keep Point Reyes for Wildlife

Dear John Weber,

I cannot overstate how much I oppose the idea of turning this park into an area for the use of individual farmers and ranchers. Commercial agriculture has no place in our national park system, even if it could be accomplished without stressing the wildlife in the park, but when you consider putting the requirements of the farmers and ranchers ahead of the needs and health of the wildlife --- that is very much the tail wagging the dog.

Our national parks are for all the people of this country, not just a few individuals who want to use them for monetary gain. The most important function of the parks is to preserve the ground, the air, any bodies of water, the plants and animals and all the other forms of life that naturally occur in that area, to preserve the environment, to keep it from the harms of development and resource extraction. The second most important function of the parks is to provide a place for the American people to have contact with Nature on a scale that can't be found in most of the world these days, to let us have a glimpse of what this world would be if we weren't here and to let us relax and revel in the immensity of the difference between what the world is in its natural state and what it is like where most of us live.

I object to the National Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore.

I oppose the killing of native wildlife and the designation of commercial agriculture as the park's main use.  
 \*\*Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit.\*\*

I'm asking you to do everything in your power to stop this plan. Please. This is really important.

The native tule elk are an iconic part of the natural landscape at Point Reyes and are the only tule elk herds within the national park system. There's no ecological justification or valid management reason for harassing, fencing or shooting elk in the park. Commercial lease holders on our public lands shouldn't be dictating policies that persecute the park's wildlife.

Alternative B doesn't manage commercial ranching leases to accommodate elk or other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil and native vegetation. Instead it sets a horrible precedent by expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
 Cathy Smotherman  
 College Grove, TN 37046  
 cathy.smotherman@yahoo.com

## Opposition to Plan B

Barry Spitz <bzspitz@aol.com>

Tue 11/3/2020 1:40 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Dear California Coastal Commissioners.

I urge you to reject the National Park Service's Plan B for managing the ranches at Point Reyes National Seashore. It seems to me that few things can be more antithetical to the core mission and purpose of the Coastal Commission than Plan B.

I am so disheartened whenever I pass the nearly 20 miles between the Point Reyes Light House and the Pierce Point Ranch and see, save for a handful of public entry points, nothing but barbed wire fences on both sides of the road. And behind all that fencing is massive environmental degradation of our coast line. You must not allow this to continue, much less to even worsen.

This is a NATIONAL seashore, all of which should be open to all. The ranchers were paid for their property and agreed to leases, all of which have long expired. It is time to tear down the fences, restore the native habitat and open the land. More than 90% of respondents to the Draft Plan survey wished this to happen. Please make it so.

I am the author of ten Marin County history and outdoor guidebooks and was formerly First Vice President of the Golden Gate Audubon Society chapter. Thank you.

-- Barry Spitz, 155 Los Angeles Boulevard, San Anselmo CA 94960; (415) 521-8793

**From:** mary shabbott <mshabbott@sbcglobal.net>  
**Sent:** Monday, October 19, 2020 6:17 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Another species

Please oppose Alternative B on the Environmental Impact Statement for the Point Reyes National Seashore. Do not allow the endangered Tule Elk to be murdered for the ranching industry at Point Reyes National Park.

Thank you,  
Mary Shabbott



**From:** susan glover <soo\_g@btinternet.com>  
**Sent:** Monday, October 19, 2020 12:31 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Save the Tule Elk

Dear John,

Please support the Tule Elk by opposing Alternative B on the Environmental Impact Statement for the Point Reyes National Seashore if Huffman reintroduces it.

Huffman serves on Congressional committees sworn to protect the climate, wildlife and parks. His support for ranching in the national seashore runs counter to those goals.

Please help the planet sustain it's rapidly falling wildlife.

Susan Leahy  
England

**From:** Helen Israel <helenisrael2@gmail.com>

**Sent:** Sunday, October 18, 2020 8:15 AM

**To:** Gavin@gavinnewsom.com; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

**Subject:** Save the Tule Elk!!

Gavin & John -

I am asking you to step up and use your power to intervene on behalf of our beautiful coastal ecosystem in California. The National Park Service (NPS) has proposed the expansion of ranching activities at Point Reyes National Seashore. The native Tule elk, already suffering dehydration due to no water source and lack of habitat due to the prevalence of ranching, will be squeezed to the brink of extinction under this new plan. Despite 91% of Californians opposing ranching in our vital seashore, NPS wants to expand the number and scope of activities. We can't allow this to happen in our own state against our will.

This is a national park. It ought to be the most protected land on the planet, but we're allowing ranchers to spread liquified manure on the ground. When it rains, that runs off into the water and turns into algae blooms that chokes off life in the sea — in the Greater Farallones National Marine Sanctuary. Doing that anywhere is inexcusable, but to dump it in a marine protected area that whales migrate through is a real disgrace on California. Resources need to be deployed to understand the scale of this problem. I ask you to oppose Plan B and direct the California Department of Fish and Wildlife to conduct an impact assessment and water quality tests on the damage to Drakes Bay due to runoff in the area. Please help stop National Park Service Director Woody Smeck from signing this plan.

Ranches have a place: inland. Responsibly managed and on private land. Away from vulnerable populations and vital ecosystems. These folks have been given decades to move. Please, they need to go to where their impact can be minimized.

Thank you,  
Helen

**From:** kris nill-snow <kens\_catwoman@yahoo.com>  
**Sent:** Saturday, October 17, 2020 8:14 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Oppose the Killing of Tule Elk at Point Reyes Nat'l Seashore

Dear Mr. Ainsworth,

As a frequent visitor to the Point Reyes National Seashore, I am adamantly opposed to expanded ranching on the property & to the shooting of Tule Elk that is recommended in

Plan B of the Environmental Impact Statement. This is a publicly owned seashore & sanctuary. Cattle ranchers should not be given this space for free. The majority of the public

opposes this plan. Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service

Regional Director Woody Smeck signs this disastrous plan.

Sincerely,

Kristine E. Nill-Snow

**From:** Cecylia Szewczyk <szewczykcecylia@gmail.com>  
**Sent on:** Friday, October 16, 2020 7:46:02 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Tule Elk

Dear John,

In the moment we die we think of the good & brave things we did in our life, things that were not motivated by money.

Right now we have a chance of helping another species survive - Tule Elk. Species that is dying inside of the national park, the very institution we have formed to protect wildlife and that has now broken its promise and we do it to help poor dairy farmers that have been paid 50 mln dollars for their lands by the government and given 25 years to relocate. These are the same farmers that profit from endless abuse of cows and their offspring as well as land & climate deterioration.

The math is simple here in the eyes of so many. Please side with us, help the Tule, be an example to your colleagues and children and think of this good thing that you did when the moment comes to die.

Best regards,  
Cecylia Szewczyk  
+1 608 509 2652

## Elk

Jean Enos <jeanenos@hotmail.com>

Fri 10/16/2020 8:56 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Dear Point Reyes Management,

I am writing in response to the lives of the Elk in Point Reyes. I was very surprised to hear through friends and media that to help the farmers , ect, you plan to kill the elk. That sounds extreme. Is there an area you could corral them or see if any of the Zoos could house them till you manage your concern.

It is just that when I take my children to Hearts Desire we always visit the elk. I will miss that beautiful sight. I really could not believe that you were actually going to kill them.

Jean Enos

A person of concern

Sent from my iPhone



**From:** <cypoten@everyactioncustom.com>  
**Sent on:** Thursday, October 15, 2020 9:11:20 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Manage Point Reyes for Wildlife — Choose Alternative F

Dear John Weber,

Increasing commercial agriculture and killing Tule Elk and other native wildlife is counter to the letter and intent of the Point Reyes National Seashore founding agreements. I respectfully request that you abide by those agreements and reject Alternative B., which conflicts with your responsibility to preserve the natural environment of public lands. Alternative B defies current science that indicates methane gas released by livestock must be reduced. It ignores the findings of the public comment process, which found 97% of a sizable number of participants solidly in favor of alternative F.

A plan that calls for culling Tule Elk is a travesty of the public trust. The PRNS founding agreements stipulated that leases would not be extended beyond the life of the leaseholders. who were generously compensated for the land the sold to NPS. That deadline is way past due.

Alternative B fails to protect coastal ecosystems and will establish a dark precedent for expanding private agricultural uses on public parklands. Permitting row crops and introducing sheep, goats, pigs and chickens will inevitably create more conflicts with other wildlife in the park.

I urge the Park Service to approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit. It is the only option that abides by the founding agreements.

Sincerely,  
Cynthia Poten  
Sebastopol, CA 95472  
cypoten@gmail.com

**don't kill the elk**

Greg & Susie Farrar <gregandsusiefarrar@gmail.com>

Thu 10/15/2020 12:04 PM

To:

- gavin@gavinnewsom.com <gavin@gavinnewsom.com>;
- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>;
- Schiff.constituent@mail.house.gov <Schiff.constituent@mail.house.gov>

Cows are a big reason we have climate issues. The effluence of pigs is killing our creeks and pollution from this kind of farming harms our environment. People need to eat, but they need to eat smarter and we have to stop the pollution. Keep the elk. Don't kill them.

Thanks for listening.

Susan Farrar

US Citizen concerned about our precious environment

## **Pt Reyes Park**

Dennis Fleming <denriverman@aol.com>

Thu 10/15/2020 10:33 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

I was out walking the park yesterday and was amazed how much pollution and over grazing is done by the cows and cattle out in our park. There is an abundant amount of land which is barren. Nothing but dirt and lots of polluting manure. Please limit the ranching activities out there and don't allow the killing of our native elk. Thanks. Dennis Fleming, Woodacre, California  
Sent from my iPad

**From:** <byerbird@everyactioncustom.com>  
**Sent on:** Wednesday, October 14, 2020 8:19:16 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Manage Point Reyes for Wildlife — Choose Alternative F

Dear John Weber,

Dear directors, superintendents, comissioners,

I am outraged and disturbed by the proposed changes in the NPS management plan to favor ag business over conservatiion efforts.

For the health of the parklands' ecosystems and indeed our planet, we MUST stop favoring business interests over the needs of our wildlands and wildlife.

As a California taxpayer and former resident of the GGNRA (I ran the Golden Gate Youth Hostel in the Marin Headlands 1980-1983 and the Miwok Stable in Tennessee Valley 1986-1988) I assert my right to object to the park service plans which call for conversion of park grasslands in order to allow ranchers use of these lands for ag business which will surely do ecological damage. I am doubtful there would be any oversight to control or check bad practices that would negatively impact water quality or harm/endanger native wildlife in the park.

I strongly object to the National Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore. I oppose the killing of native wildlife and the designation of commercial agriculture as the park's main use. Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit. I'm asking you to do everything in your power to stop this plan.

The native tule elk are an iconic part of the natural landscape at Point Reyes and are the only tule elk herds within the national park system. There's no ecological justification or valid management reason for harassing, fencing or shooting elk in the park. Commercial lease holders on our public lands shouldn't be dictating policies that persecute the park's wildlife.

Alternative B doesn't manage commercial ranching leases to accommodate elk or other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil and native vegetation. Instead it sets a horrible precedent by expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
Cynthia Boyer  
Sonoma, CA 95476  
[byerbird@sonic.net](mailto:byerbird@sonic.net)

## **Do not cull the Point Reyes tule elk!**

Lucy Kelly <lucyk6992@yahoo.co.uk>

Tue 10/13/2020 1:14 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

California Coastal Commission!

Do not cull the Point Reyes tule elk! They are rare, and they have a right to the land! It was bought for them! The ranchers and farmers have no right to the land! They sold it, decades ago! The money they got wasnt a pointless free gift! It was payment by taxpayers to get them off the land! Please get the ranchers and the farmers off the land now!

The public wants the elk on the land! Only the farmers and ranchers want themselves to stay on the land! This undemocratic violation of public will and property can not be allowed! Please remove the farmers and ranchers from the land, now!

The elk are rare! By nature, they should be in the tens of thousands! The tourists come to see them as magnificent and free, not as pitiful and confined! Give them their land and freedom, now! Take down the fence that confines them at Point Reyes, and set them free!

Give the tule elk their land!

Yours sincerely,

Ms L Kelly.

[Sent from Yahoo Mail on Android](#)



**From:** <kashmiri.sky@everyactioncustom.com>  
**Sent on:** Tuesday, October 13, 2020 10:02:51 AM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Point Reyes for Wildlife not profit — Choose Alternative F

Dear John Weber,

People visit Point Reyes to experience the outdoors and hopefully see the wildlife. The National Park exists for the American People, not the profit of a few.

The National Park Service is wrong to select Alternative B for the General Management Plan amendment for Point Reyes National Seashore.

It is wrong to kill native wildlife and designate commercial agriculture as the park's main use. Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit. Please stop this plan.

The native tule elk are an iconic part of the natural landscape at Point Reyes and are the only tule elk herds within the national park system. There's no ecological justification or valid management reason for harassing, fencing or shooting elk in the park. Commercial lease holders on our public lands shouldn't be dictating policies that persecute the park's wildlife.

Alternative B doesn't manage commercial ranching leases to accommodate elk or other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil and native vegetation. Instead it sets a bad precedent by expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park.

Please reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
F Hammer  
San Francisco, CA 94123

kashmiri.sky@gmail.com

Dear California Coastal Commission, October 12, 2020

I write to you urgently about the emergency of Point Reyes National Seashore and the imminent October 18, 2020 deadline for Record of Decision (ROD) signing by the just-appointed National Park Service (Acting) Western Regional Director. This signing will activate Alternative B, which will exponentially expand private ranching and diversified agricultural and other industrial-level business development – while crushing environmental protections – in Point Reyes National Seashore (PRNS), our vanishing Yellowstone of the Pacific.

As a decades-long resident of California, and person appalled at pervasive now-industrial-level ranching in our National Seashore, I FIRMLY OPPOSE the National Park Service's General Management Plan Amendment - Final Environmental Impact Statement (GMPA-FEIS) for PRNS – specifically I FIRMLY OPPOSE its selection of Alternative B instead of the demonstrably more scientifically-sound and publicly-supported Alternative F.

Before October 18, it is urgent to Point Reyes National Seashore, Californians, and the American and global public that you as primary protector of our California Coast and its integrity for posterity immediately PURSUE, CONDUCT OR ENDORSE: 1) delay of the October 18 ROD signing by the NPS (Acting) Western Regional Director; 2) all available scientific and legal inquiry, including long-overdue water (fresh, estuarine, and ocean), soil, and air quality tests; 2) a Supplemental Environmental Impact Statement (SEIS) addressing droughts and wildfires; 3) a Federal Consistency Review to address the well-known lack of PRNS water-quality testing, and clearly-evident and widespread environmental degradation across 27,000 acres of lands and waters leased to tenant-lessee ranchers; 4) rigorous investigations into conflicts of interest between PRNS officials and the 24 tenant-ranchers who have leased and destroyed these taxpayer-owned public parklands since 1962; and 5) immediate emergency enforcement of applicable clauses of the Organic Act of 1916; the Point Reyes National Seashore Act of 1962; the Endangered Species Act; the Migratory Bird Treaty Act; and other applicable federal and state laws and policies.

The woeful Alternative B chosen by NPS/PRNS officials WILL: 1) expand the geographic/numeric range of domestic cattle in OUR National Seashore – leased ranchland already occupies and limits access to one-third (27,000 of 71,000 acres) of the national park, with 5,000-6,000 cattle compared to 400-500 Tule elk overall, more than a 10:1 ratio of domestic cattle to wild elk; 2) allow business diversifications by market-failing, taxpayer-subsidized, private dairy and beef industry ranches to include chickens, goats, sheep, pigs, row crops, and roadside and overnight businesses; 3) allow mobile/onsite animal slaughtering and processing facilities within the Seashore; 4) increase exclusionary miles of barbed wire fencing across landscapes; and 5) keep

a rare and diminished herd of Tule elk fenced-and-penned in a man-made compound on Tomales Point, literally held captive from sufficient fresh water and feeding sources by PRNS officials (charged with wildlife protection) as a de facto means of management-by-thirst-and-starvation (the same enclosure was implicated in a 2014-2015 die-off of half that herd, and now again threatens hundreds more rare Tule elk with fatal consequences).

Not lastly, Alternative B, with NPS/PRNS willful and purposeful intention, establishes official Seashore policy to kill-off by prescribed lethal methods many wild Tule elk in trade for priority of domestic cattle – to appease these tenant-ranch businesses leasing publicly-owned land from all Americans for private, taxpayer-subsidized, factory-ranch, dairy and beef cattle businesses.

October 18 is the date the NPS (Acting) Western Regional Director is set to sign this Alternative B public-lands-and-waters giveaway to private industry. This giveaway delivers even further cattle, agricultural, and business diversifications across our national Seashore to just 24 ranchers. National parks and global climate protections are what's at stake here.....not only for the rare and proud Tule elk species and a beloved and iconic National Seashore full of beauty and scientific value – but the macabre precedents it sets for federal and state publicly-owned environments in California and the nation, and upon our life-giving climate for present and future generations.

This is a National Seashore belonging to all the American people, not 24 entitled, duplicitous, and rapacious industrial ranchers. These 24 ranch operations were paid millions of dollars in the 1960-70s to move off our public national park in a phased manner. Why are they not only still there, but laying land, water, and air to waste after nearly 60 years?

The time is URGENT to prevent the obliteration and loss of Point Reyes National Seashore to further agricultural and industrial-level business development.

An independent data analysis found that 94% of 7,627 respondents during the GMPA-EIS public comment period support Alternative F – which after nearly 60 years since park inception, WOULD: 1) finally remove cattle ranching from Point Reyes as was intended in the founding legislation and by its original authors and proponents; 2) protect rare and iconic Tule elk; and 3) at last restore and protect endangered native California coastal prairie habitat, wildlife, wildlands, and wild waters. This 94% of public comments vigorously supporting Alternative F included reports, papers, data, surveys, articles, and remarks from established and proven wildlife and habitat scientists, environmental-law attorneys, field researchers, other experts from relevant

disciplines, and perhaps most importantly – National Seashore-concerned Americans and worldwide visitors.

Instead of Alternative F, NPS and PRNS will use Alternative B to pay, subsidize, and support private industrial-level cattle-ranch operations to further pollute and degrade the largest protected American coastal region south of Alaska – a sadly diminished territory of rare and endangered animal and plant life still enjoyed by millions of human visitors each year despite the ranches' takeover. Point Reyes National Seashore was established from a truly unique vision at its founding – that is, to be a global model of natural restoration and protection, scientific study, and public enjoyment and awe.

The sheer volume of agriculture and business development proposed in the NPS/PRNS-preferred Alternative B set to be activated on October 18 would change the nature of Point Reyes National Seashore into a de facto Point Reyes Industrial Cattle Ranch and Slaughterhouse.

The 27,000 acres of these factory ranches already HAVE BROUGHT: 1) a vast dead zone of overgrazed, muddied, and manured nonnative short-grass fields; 2) scattered remnant coastal prairie patches among razed monoculture mesas and hills mowed insistently while killing nesting birds and wildlife; 3) mechanized liquefied manure-spraying that permeates soil and riparian habitats; 4) defense-installation-sized non-historic 20th/21st-century-constructed ranch compounds blotting the landscapes; 5) cruel and inhumane separation and treatment of cattle and calves forced respectively into inhumane feeding and breeding scenarios and sharply-confined fly-infested plastic hutches; 6) some of the worst air and water quality on the American West Coast; 7) methane and other greenhouse gas emissions (GHGs) at levels regularly competitive with Los Angeles, plus agchem and ranch-animal bacterial toxic runoff from creeks to estuaries to ocean; 8) beach, trail, estuary, and ocean defilements that put both people and wildlife at severe disease risk – and 24 entitled, duplicitous, and taxpayer-subsidized private industrial-ranch businesses paid off handsomely many decades ago for their land, with the fully and mutually agreed-upon condition they would vacate after payment for said land holdings within a well-defined and decades-long-past timeframe.

This was NOT the intent of the founding Point Reyes National Seashore legislation signed into law by President John F. Kennedy on September 13, 1962 – now 58 years ago and ever long-abused.

The Tule elk on Point Reyes are symbolic, recognizable, meaningful totems of the American people's effort to restore and protect this place of rare, threatened, and

endangered species – of this resolute cause for environmental accountability and action in a time of habitat diminishment, mass biodiversity loss, and climate crisis.

The time is URGENT to prevent further and utter dismantling, collapse, and loss of this ‘Island in Time’ – California’s and America’s Point Reyes National Seashore. We must correct course immediately.

The California Coastal Commission must intercede and ACT TO 1) delay the imminent October 18 ROD signing; 2) REJECT the NPS/PRNS Alternative B before it is signed by the NPS (Acting) Western Regional Director; 3) strongly voice support for Alternative F as a sane and sound science-based solution to a decades-long occupation by a rapacious, private, for-profit, subsidized cattle industry in our National Seashore; and 4) and fully and factually investigate blatant ongoing NPS/PRNS misappropriation and mismanagement of Point Reyes National Seashore – our vanishing Yellowstone of the Pacific.

Thank you for your immediate actions to contact the NPS (Acting) Western Regional Director and stop this environmental tragedy before it is signed and activated on October 18, 2020. It is of utmost importance, and A HIGHLY URGENT CALIFORNIA COAST, NATIONAL PARKS and CLIMATE PROTECTION MATTER.

Respectfully,

Mark A. Walsh

415-425-9978 [markwalsh@bluewavestrategic.com](mailto:markwalsh@bluewavestrategic.com)

## Regarding the new wildlife management plan

Elle Aviv Newton <eenovaa@gmail.com>

Mon 10/12/2020 4:04 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

To the California Coastal Commission,

I write to you as a lifelong Californian. I write to you as a native of West Marin. I write to you as a millennial. I write to you as an environmental activist. And I write to you as the heir of extreme climate change - a development none of my forebears has ever had to survive.

I am writing to express, in the fiercest possible terms, the moral and ecological necessity of rejecting the new management plan proposed in relation to the dairy ranches of Point Reyes.

Point Reyes is Miwok land. It is a national park in the United States. It is the most accessible national park to the 6 million people living in the Bay Area. It is the home to one of the most vulnerable and prized ecosystems in the US and certainly in California.

Dairy ranchers were given lease limits and millions of dollars in direct payment in order to leave Point Reyes decades ago. They never left. The National Park Service looked the other way, as huge swaths of land became barren and the creeks clouded by massive excrement pollution.

The dairy operations cause clear, indisputable harm to the land. Any drive north of Inverness shows it clearly. Cattle trod the soil, prevent the growth of native verdure, and their grazing lands limit movement of native animals. The endangered tule elk herd are fenced in, and during the incredibly difficult months of drought, fire and smoke this year, were left to die of thirst.

The tule elk are dying of thirst, and yet did any cattle meet this fate?

No. Not a single cow was lost to the elk fences or to the drought.

Why are the cattle receiving more protection than the elk herds, which are native to California, which are endangered, which without our protection, may not exist in 100 years?

The tule elk need us. They need us to fight for ecological protections, the rights of the land to exist and replenish, and for all of California to be able to behold the mighty, ancient and restorative power of Point Reyes National Seashore.

The dairy ranchers - a handful of WEALTHY families who are illegally settled on a National Park land that belongs to all of us - are harming our environment.

The NPS and the Coastal Commission have an obligation, not to private industry or to legacy wealth, nor to quaint - but in truth destructive - animal processing operations. The NPS and Coastal Commission have an obligation to we, the people, the collective caretakers and inheritors of the beautiful and sacred land of Point Reyes, which is stolen land.



We need more justice. Not less.

Reject this dangerous and insulting and DEADLY plan, which dismisses the near-unanimous feedback from the public - over 90% of respondents rejected the dairy farms in the recent public comment period, and demanded we return the land to the wild, as shown in a study by volunteers for ForElk.org. These responses show an incredible clarity of purpose. The public is choosing to protect the land, rather than this small population of rich dairy farmers whose operations harm a national park. It is so affirming to see a collective wisdom at all. And now we must heed this collective wisdom, born from our ecologically-motivated citizenry. We must not sacrifice lives for profits. We must not kill Tule Elk to assuage the interests of a privileged class of people who have disrespected, neglected and abused the public's trust.

IF WE DO NOT REWILD POINT REYES, and specifically the land which our country paid MILLIONS for decades ago and never saw returned, then at what point do we stop protecting Point Reyes?

I URGE YOU IN THE FIERCEST POSSIBLE TERMS: BREAK THE COLONIAL-SETTLER NARRATIVE OF POINT REYES.

Return this land to the wild. Forge a management plan with local Miwok peoples. Create sustainability in this place. We are LIVING THROUGH the most violent climate change ever witnessed. Who among us could walk outside in August, September or October and deny the grave juncture of time in which we exist? Who could see the sun rise on September 9th?

We can no longer make alliances with destructive industries and pretend things will simply "keep going on" as usual.

This is not just about the specific land, even though it is. This is not just about the wild tule elk, even though it is.

THIS IS A REFERENDUM ON LAND MANAGEMENT, PUBLIC LAND, OUR FUTURE AND THINGS THAT WE CAN NEVER GET BACK ONCE WE LOSE THEM.

Ecodiversity is the most important tool we have to combat climate change. It is more important than any single life, any single legacy business, any single contract. It is all we have. We MUST protect it.

Keep Point Reyes wild. Evict the dairy ranches. Honor the Miwok and the native peoples of Marin County. Return the land to the public trust, with native co-management. Keep it wild, and keep the Tule Elk alive and well for many generations to come.

Regards,  
Elle Aviv Newton

**From:** Melanie Carpenter <mcarpenter@miyokos.com>  
**Sent:** Monday, October 12, 2020 2:23 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** From a Concerned Citizen

Dear Mr. Ainsworth.

I hope you receive many letters from people who are concerned about our environment. In this case I am writing about the Public Lands in Point Reyes that are being destroyed by the grazing of cattle belonging to some very GREEDY Ranchers. I write "greedy" because they won't even "share" the land they ILLEGALLY occupy with the native Tule Elk and your organization is allowing this to happen!

I urge you to reconsider and not permit the killing of a species that was here long before us. Their only mistake was being born on lands that some very selfish people consider "theirs".

Do the right thing, have compassion and please allow the Tule Elk to live peacefully at Point Reyes National Seashore, a park that belongs to all of us, not just a handful of inconsiderate Ranchers!

Thank you.  
Melanie Carpenter,  
A concerned citizen,  
Penngrove, Sonoma County, CA



**Melanie Carpenter**  
**Event Coordinator**  
Mobile: 949.630.7914  
2086 Marina Avenue  
Petaluma, CA 94954  
We're [Hiring!](#) Join the Revolution.

**Please stop killing of Tule Elk**

Melissa Flower <melissajaneflower@gmail.com>

Mon 10/12/2020 9:55 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Dear Coastal Commission,

The National Park Service has aligned itself with the ranchers who are paying to be on our national park land. The ranchers have already blocked the elk from accessing water easily. The land and water there are severely polluted. Now, the Park has decided to kill many of these elk. Ranchers want to kill off elk to make room for more ranching. They spray animal waste on the hillsides, they pollute the water, they kill off native grasses and other plants, and they are bent on killing the beautiful elk, too, who have done nothing but live peacefully on the hillsides. Tens of thousands of visitors come every year to see the area and enjoy the elk.

The elk and entire Point Reyes Seashore need your help. Please let the Park Service know they cannot allow filthy, polluting business like ranching along our national coastland.

Thank you deeply for your efforts to protect the coastline,

Melissa Flower  
1600 3rd St  
San Rafael, CA  
415-456-4776

## NPS Plan for Point Reyes National Seashore

Patricia Huey <pat.huey@sbcglobal.net>

Mon 10/12/2020 8:05 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Hi,

I am appalled that the National Park Service is planning to go ahead with its plan to allow ranchers to expand ranching and to kill Tule elk in the once pristine Point Reyes National Seashore. This is such a bad idea for so many reasons. Please do what you can to stop this disastrous plan.

We are in the midst of some of the worst wildfires in California's history. Scientists the world over have confirmed that animal agriculture is the leading cause of climate change. A full 50 percent of our state's water goes to this industry. In Point Reyes National Seashore, the difference between the cattle grazing lands and the lands where the Tule elk and other wildlife live cannot be more striking. You can easily see that the scorched and barren lands where the cattle graze are yet another wildfire in the making. Why would anyone allow this to happen? Yet the lands where the Tule elk and other wildlife live are far healthier, in spite of the lack of water that has recently caused the deaths of some 15 Tule elk. A few weeks ago, activists brought water to the Tule elk, because the NPS is deliberately depriving them of water. Rather than let the Tule elk have just this one trough of water, they emptied it -- a cruel and sadistic act that benefits no one. And my tax dollars paid for this disgusting action.

In 1962, each ranching family was paid \$57 million (the equivalent of \$340 million today) and given very generous benefits such as not having to pay property taxes, paying very low rent for their homes in the park, and having our Federal tax dollars pay for the maintenance of their ranches. These ranching families now own other ranches outside the park. This is a disgraceful waste of our tax dollars. These ranchers were supposed to have left in the 1980s, yet they remain. The original agreement, which the ranching families signed, clearly stated that they were to leave in 25 years so that the park could fulfill its purpose: to be 100 percent dedicated to wildlife.

Do you know that only 4 percent of animals on this planet are wildlife and that the remaining 96 percent are either humans or farmed animals? We MUST do what we can to preserve wildlife habitats, as Point Reyes National Seashore was intended to be. Animals in the wild are vital for the health of our delicate ecosystems. When wildlife goes, we will go, too. We do not have time to waste. It will be so easy to restore these lands, too. A few years ago, Pacheco State Park removed its cattle and within a year the land's health was restored,

all thanks to the work of the wildlife living in that park. Human intervention was not done nor was it necessary.

Dairy is a dying industry. It survives only because it is propped up by OUR Federal tax dollars. We don't need this industry because there are so many delicious non-dairy alternatives. Miyoko Schinner, founder of Miyoko's Creamery in Petaluma, has been working with ranchers to help them convert their industries to sustainable businesses that do not harm the planet. Her employees are far better paid than the average Point Reyes ranch hand (who only gets about \$13 an hour), get a 401(k) plan, get reimbursed for education, have full health care coverage, and are even fed meals on the company premises. Her company is growing, too. And all without getting government subsidies like the failing ranches get. Furthermore, the park generates far more revenue from tourism than it does from the ranches. Isn't that a much better solution to the employment crisis that we are undergoing now? Common sense will promote better employment opportunities and tourism, not ranching.

I visited Point Reyes yesterday and was struck by the numerous signs begging people to conserve water. How ironic, given that each cow in Point Reyes consumes a full 35 gallons of water every day! Tule elk drink far less water and unlike cows, do not cause the erosion problems that plague the cattle grazing lands of Point Reyes.

Please urge further inquiry into this plan, such as performing water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this truly horrendous plan.

Thank you,  
Patricia Huey  
1443-B Page Street  
San Francisco, CA 94117

## The Tule Elk at Point Reyes National Seashore

Hazel Huey <hp88huey@gmail.com>

Mon 10/12/2020 4:41 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Dear Member of the California Coastal Commission,

I am very concerned about the lack of support National Park Service Regional Director Woody Smeck has shown for the Tule elk and all the wildlife and native plants in Point Reyes National Seashore. To expand ranching and to shoot the Tule Elk, as recommended in Plan B of the Environmental Impact Statement would be disastrous for the wildlife, native plants and for the park itself. I urge you to do what you can to stop this before time runs out.

The public is against this decision and the only ones who benefit are the cattle ranchers, who continue to destroy this magnificent land. Not only the animals and the land will lose but people who visit the park every year, who support the park, will lose. Once the ranchers take over it will be gone forever. They do not belong in Point Reyes National Seashore.

You certainly understand what will be lost. The habitat for The Tule elk cannot be restricted. It will cause inbreeding and they will die out. Also, Point Reyes National Seashore is one of the most biologically diverse areas in the state. Birds use this area as a resting place when they migrate south.

Ranching has no place in a national park that our taxes support. In 1962, the ranchers were paid \$57 million, not to mention being given generous benefits such as not paying property taxes, paying low rent, and having our Federal tax dollars pay for the maintenance of their ranches. Now they now want to expand. This is a waste of our tax money. The agreement was to lease their lands until it was time to move on, and they have long since overstayed. These are not poor people. They have other ranches outside the park and will not be destitute if they leave.

Their ranches contribute so much to the pollution that periodically the beaches have to be closed off. According to a 2001 biological assessment prepared by the National Park Service, they have contributed to water pollution, death of wildlife and the destruction of native plants. And that means less revenue for the park since no one wants to swim with feces.

Thank you for your attention and support of our cause.

Best wishes,  
Hazel Huey



**From:** <oboemjm@everyactioncustom.com>  
**Sent on:** Monday, October 12, 2020 1:41:33 AM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Manage Point Reyes for Wildlife — Choose Alternative F

Dear John Weber,

PUBLIC LANDS GRAZING EQUALS WELFARE RANCHING. Keep the habitat for the tule elk and end the polluting , destructive cattle operations. Why are you extending the leases ? Illegal and immoral..

I urge the Park Service to reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
Martha Martin  
Lafayette, CA 94549  
oboemjm@yahoo.com

## Point Reyes Elk and Wildlife Management

Brian Darst <bhdarst@gmail.com>

Sun 10/11/2020 2:58 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Hello,

My name is Brian and I have been visiting Point Reyes for years. I am always in awe of the beauty and biodiversity of this region and of course the Tule elk that call the area home.

I have become aware of the Plan B proposal for culling elk herds and allowing ranchers to extend their leases on this public land, and I am strongly opposed. These ranches have been severely degrading and polluting the landscape at Point Reyes for decades, and once thriving ecosystems there are now hanging by a thread. It is time these ranchers leave. Public lands should benefit the public, not a handful of individuals with private interests.

I am emailing you to please do what you can to put a stop to this disastrous plan and to urge further environmental assessments of the impact of these ranches and elk cullings. This plan is an insult to the land, the animals, and the people who visit it.

Thank you for your understanding.

Regards,  
Brian Darst

From: Dennis Fleming <denriverman@aol.com>  
Sent: Sunday, October 11, 2020 2:46 PM  
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
Subject: Tule elk

I'm opposed to the fencing in of our native Tule elk in Pt Reyes Park. They shouldn't be killed. I'm also against an increase in ranching activities in our park. The park should be to preserve natural resources Not for profit and NOT to add pollution to our land, creeks and ocean by the 6000 cows.  
Thanks, Dennis Fleming, Woodacre, California

Sent from my iPad

**From:** <bmadaras@everyactioncustom.com>  
**Sent on:** Saturday, October 10, 2020 11:17:30 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Keep Point Reyes for Wildlife — Choose Alternative F

Dear John Weber,

Are you the Park SERVICE -- how can you want to DESTROY this amazing national PARK???

Sincerely,  
Barbara Madaras  
Eureka, CA 95501  
[bmadaras@gmail.com](mailto:bmadaras@gmail.com)

**From:** Myra Drotman <realtormyra@pacbell.net>

**Sent:** Saturday, October 10, 2020 11:03:31 AM

**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

**Subject:** I oppose the expanded ranching and shooting of Tule Elk at Point Reyes National Seashore

I oppose the expanded ranching and shooting of Tule Elk at Point Reyes National Seashore that is recommended in Plan B of the Environmental Impact Statement. Please STOP a THIS TRAVESTY! Please urge further inquiry such as water quality tests and a supplemental impact report on drought and wildfires before National Park Service Regional Director Wody Smack signs this disastrous plan.

Our vote and our tax dollars bought this national park land and gave leases to ranches that are allowed to be ended. They are not leases in perpetuity. There is so little wild land left. And there is plenty of hamburger. There is no reason why ranchers should be allowed to pollute and damage our national seashore. There is no reason why cows should be there instead of elk.

Please help.

Myra Drotman

Myra Drotman

(415) 601-5445 (cell)

(415) 457- 5445 (home)

**From:** <pzsilver@everyactioncustom.com>  
**Sent on:** Saturday, October 10, 2020 5:32:18 AM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Pt. Reyes: Choose Alternative F

Dear John Weber,

I oppose the killing of native wildlife and the designation of commercial agriculture as the park's main use

Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit.

There is no ecological justification or valid management reason for harassing, fencing or shooting native tule elk in the park. They are the ONLY tule elk herds within the national park system.

Alternative B sets a horrible precedent by expanding private agricultural uses on our parklands.

Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
Paula Silver  
Oakland, CA 94602  
[pzsilver@sbcglobal.net](mailto:pzsilver@sbcglobal.net)

**From:** Donna Mansour <donnalynnem@yahoo.co.uk>  
**Sent:** Friday, October 9, 2020 7:49:39 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Help - please stop Woody Smeck from signing Plan B

Dear Mr. Ainsworth,

I am asking you to step up and use your power to intervene on behalf of our beautiful coastal ecosystem in California. The National Park Service (NPS) has proposed the expansion of ranching activities at Point Reyes National Seashore. The native Tule elk, already suffering dehydration due to no water source and lack of habitat due to the prevalence of ranching, will be squeezed to the brink of extinction under this new plan. Despite 91% of Californians opposing ranching in our vital seashore, NPS wants to expand the number and scope of activities. We can't allow this to happen in our own state against our will.

This is a national park. It ought to be the most protected land on the planet, but we're allowing ranchers to spread liquified manure on the ground. When it rains, that runs off into the water and turns into algae blooms that chokes off life in the sea — in the Greater Farallones National Marine Sanctuary. Doing that anywhere is inexcusable, but to dump it in a marine protected area that whales migrate through is a real disgrace on California. Resources need to be deployed to understand the scale of this problem. I ask you to oppose Plan B and direct the California Department of Fish and Wildlife to conduct an impact assessment and water quality tests on the damage to Drakes Bay due to runoff in the area. Please help stop National Park Service Director Woody Smeck from signing this plan.

Ranches have a place: inland. Responsibly managed and on private land. Away from vulnerable populations and vital ecosystems. These folks have been given decades to move. Please, they need to go to where their impact can be minimized.

Sincerely,  
Donna Mansour



**From:** <jjatmore@everyactioncustom.com>  
**Sent on:** Friday, October 9, 2020 5:32:41 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Approve Alternative F, instead, for Point Reyes National Seashore

Dear John Weber,

The National Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore is a nightmare!!

Not only because of the outright MURDER of native wildlife and the TRAVESTY of commercial agriculture as the park's main use, but also because Alternative B is a total SELL-OUT to private profits and entitlements. These all conflict with the Park Service's mandate to preserve the natural environment for public benefit.

I'm demanding you to do everything in your power to stop this plan.

The native tule elk are an iconic part of the natural landscape at Point Reyes and are the only tule elk herds within the national park system. There's no ecological justification or valid management reason for harassing, fencing or shooting elk in the park. Commercial lease holders on our public lands shouldn't be dictating policies that persecute the park's wildlife.

Alternative B doesn't manage commercial ranching leases to accommodate elk or other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil and native vegetation. Instead it sets a horrible precedent by expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park.

Reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
Jon Atmore  
Seattle, WA 98115  
[jjatmore@yahoo.com](mailto:jjatmore@yahoo.com)

**Protect the Tule Elk AT PRNS**

JULIE PHILLIPS &lt;tuleelk@comcast.net&gt;

Fri 10/9/2020 12:24 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Dear Coastal Commission leaders!

Thank you for the excellent job you do for all of us in California! Your leadership and oversight of our environment and native landscape is essential!

I am hoping the Commission can help on a local Bay Area challenge that is occurring at Point Reyes National Seashore (PRNS) (part of the National Park System). The NPS has selected a management plan alternative that will allow the "killing" of our Native Tule Elk in this National Park while allowing the cattle/dairy ranchers to remain on our public lands and expand their operations! These cattle ranchers were paid millions of dollars for their lands years ago (1962) and given limited leases as they phased out their operations. Those leases expired years ago (1987) and yet the ranchers remain on this very degraded landscape. The damage caused by these cattle operations to the coastal areas at PRNS including the impacts on the coastal shoreline and waters is very troubling!

The NPS will finalize their plan in the next few weeks and will allow the "management" or killing of the Tule Elk! Tule Elk are a California native Endemic Species (found only in California) and this is the only National Park that has native Tule Elk!

I am a Tule Elk Biologist and retired Community College Instructor (Environmental Science/Wildlife Management) that has spent over 30 years following the reintroduction of Tule Elk herds in CA and observing the herds throughout their native range. I am concerned about the long-term health of the Tule Elk especially on OUR public lands! There are only about 5,700 Tule Elk in California (originally 500,000 Tule Elk) with only about 730 Tule Elk at PRNS! Yet there are over 5,000 cattle in this National Park!

The Coastal Commission has "legal" jurisdiction and oversight of our fragile coastline and waters which includes wildlife species like the Tule Elk! Please stop this inhumane and irresponsible treatment of our native Tule Elk on public lands in California! And also direct the National Park Service to protect and restore the degraded landscape at PRNS as well as protect our native Tule Elk in this park! Over 91% of the people surveyed on this issue supported protection of the Tule Elk over cattle at PRNS! Also, the extremely degraded landscape at PRNS in the cattle pastoral lands raises serious concerns about contributing to Climate Change, water/ocean pollution, air pollution and destruction of the topsoil and more! Most of the native plants that would sequester carbon on these lands has been destroyed by the cattle as well! Let's make PRNS a Carbon Sink again with the Tule Elk roaming freely and restoring the native landscape including the native vegetation that will be essential in this process and will protect our coastal areas there as well!

Thank you for your continuing leadership for the people!

Julie Phillips

Tule Elk Biologist

[tuleelk@comcast.net](mailto:tuleelk@comcast.net)

<https://naturebasedteaching.com/>

**Please use your authority to be humane, moral, ethical, legal**

Susan Bradford <sbradford@sonic.net>

Fri 10/9/2020 10:17 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>;
- gavin@gavinnewsom.com <gavin@gavinnewsom.com>;
- Denryter, Kristin@Wildlife <Kristin.Denryter@Wildlife.ca.gov>;
- Ho, Krystal@Wildlife <Krystal.Ho@Wildlife.ca.gov>

Dear Humans.

This is URGENT!!! Please step in on behalf of NPS!!!!

*"I oppose expanded ranching and shooting Tule elk at Point Reyes National Seashore, recommended in Plan B of the Environmental Impact Statement. Can you stop this travesty? Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Linda Walker signs this disastrous plan.*

1. California Coastal Commission, has authority to require compliance with the California Coastal Act. Please delay the signing of the plan.
2. Governor Newsom, step in at Point Reyes and ask the NPS to reject their plan and conserve and protect this coastline!
3. Congressman Adam Schiff, please be sympathetic to our cause as you are a vegan advocate, and with your notoriety in congress you could apply pressure to the park and other congresspeople
4. California Department of Fish and Wildlife - Kristin Denryter, Tule Elk & Pronghorn Coordinator and Krystal Ho

The CDFW has authority for state wide management of the Tule elk. Please step in and require alternative management strategies for the elk.

**From:** <anya.cockle@everyactioncustom.com>  
**Sent on:** Friday, October 9, 2020 10:10:09 AM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** A National Park is no agricultural land

Dear John Weber,

I am astounded and aghast after I have heard that the National Park Service wants to adopt Alternative B for the General Management Plan amendment for Point Reyes National Seashore. A National Park's priority should be to preserve the natural landscapes and the wildlife they contain, not bend down to farmers eying what they think is 'empty' space. Commercial agriculture should NEVER be designated as the park's main use. Please do everything in your power to stop this plan. If this plan goes forward, then this is a national park lying flat on its face letting itself be trampled out of existence in the dust.

The native tule elk are an iconic part of the natural landscape at Point Reyes and are the only tule elk herds within the national park system. There's no ecological justification or valid management reason for harassing, fencing or shooting elk in the park. COMMERCIAL LEASE HOLDERS ON PUBLIC LAND SHOULD NEVER BE ABLE TO DICTATE POLICIES THAT PERSECUTE WILDLIFE INSIDE A NATIONAL PARK.

Alternative B doesn't manage commercial ranching leases to accommodate elk or other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil and native vegetation. Instead it sets a horrible precedent by expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,  
 Anya Cockle  
 FR 30160  
[anya.cockle@orange.fr](mailto:anya.cockle@orange.fr)

**From:** <yphrescue@everyactioncustom.com>  
**Sent on:** Thursday, October 8, 2020 10:59:15 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Request.

Dear John Weber,

The decision by the National Park Service regarding Point Reyes National Seashore is highly regrettable. The job of the Park Service is to preserve nature, not to act as its enemy, and the moves to elevate the status of commercial farming whilst cutting protections for native wildlife are abhorrent.

Please act, as forcefully and effectively as possible, to reverse these plans and to ensure that "Alternative F" is pursued instead.

Thank you for your time regarding this highly important matter.

Sincerely,  
M Layram  
YO231HX  
[yphrescue@outlook.com](mailto:yphrescue@outlook.com)

**From:** <mmcnally@everyactioncustom.com>  
**Sent on:** Thursday, October 8, 2020 6:58:28 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Manage Point Reyes for Wildlife — Choose Alternative F

Dear John Weber,

Surely I must be wrong.

It is impossible to believe that a management plan from the National Park Service for the Point Reyes National Seashore actually involves killing native wildlife and designating commercial agriculture as the park's main use.

Assuming that this indeed is a mistake and that there is still some integrity and ethics in public service, please know that I support Alternative F that protects native tule elk.

I am sure that you have the intelligence and backbone to quickly dismiss Alternative B.

Sincerely,  
Michael McNally  
Irvine, CA 92617  
mmcnally@uci.edu



## Trash Plan B

Nancy Hair <doghairnancy@yahoo.com>

Wed 10/7/2020 2:14 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

*I (and millions of Californians) oppose expanded ranching and shooting Tule elk at Point Reyes National Seashore, as recommended in Plan B of the Environmental Impact Statement. Multiple surveys clearly show that Californians and other visitors support wildlife and woodlands... NOT the ranchers and grazing. We are sick of this corporate welfare that enables a few entitled white guys to live an enviable coastal lifestyle at the expense of the taxpayers and the indigenous animals and plants.*

*Go take one look at **what** the grazing lands look like. The degradation of the land is utterly clear to any careful observer.*

*Please demand further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this sneaky (moved along under the radar, **during** the pandemic, with no public comment) disgusting plan **that** is a slap in the face of those who care about the environment.*

*Nancy Hair  
Sebastopol CA*

## Reconsider the Pt. Reyes plan

Susan Stover <sstover@sonic.net>

Wed 10/7/2020 1:49 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

California Coastal Commision,

Thank you for allowing public comment on this important issue.

The Tule Elk in Point Reyes are literally under the gun of the National Park Service, in spite of outrage by the public and during the comment period to the NPS out of 7,627 respondents, only 179 were in favor of continued ranching. In spite of that small percentage, the NPS has decided that the ranchers can expand their polluting operations and the NPS will kill the elk in order to accomplish that. It's an outrage in our National Park. If we can't protect the elk in our backyard, what hope is there for other species?

In every regard, this is wrong. The public has made clear that we overwhelmingly reject the park service's plan to kill the elk and allow the ranches to expand their private enterprises within a National Park.

I vehemently oppose expanding ranching in Point Reyes National Park and killing Tule Elk, as recommended by the Park Service's travesty of plan B. The ranches have not proven to be good land stewards and their 6,000 cattle are destroying the native coastal grasslands and polluting the water through the park. I have witnessed not only the agonizing isolation of veal calves, but also a 2-1/2 story high pile of manure covered with tarps and 100's of tires at McClure Ranch alone. Does this say "Welsome to our National Park to you?"

Sincerely,

Susan Stover

**From:** Emese Wood <emesew@gmail.com>  
**Sent:** Wednesday, October 7, 2020 12:14 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes Tule Elk

For many years I have taken my grandchildren to Pierce Point at Point Reyes National Seashore for hikes and the highlight for them has always been their encounter with the Tule elk. With great excitement they would always count them and many times they could count over 100 in one spot. Sadly this changed a few years ago when a drought and the lack of protection for the elk decimated about half of the herd. Nevertheless we still delight in seeing these magnificent animals and I want my great-grandchildren to have the same experience. The dairy industry is diminishing and this provides a great opportunity to gradually eliminate all ranches and farms from public land--rather than trying to literally "beef it up." Dairying and ranching are some of the most environmentally destructive types of land use. I oppose expanded ranching and shooting Tule elk at Point Reyes National Seashore, recommended in Plan B of the Environmental Impact Statement. Can you stop this travesty? Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.

Thank you,  
Emese Wood  
San Rafael, CA 94901

## Private Industry Does Not Belong On Public Land

Amber Tysor <ac.cox@hotmail.com>

Tue 10/6/2020 5:17 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Hello California Coastal Commission,

The new “management plan” that Point Reyes National Park intends on moving forward with is absolutely atrocious. It is imperative that this plan be stopped, and that the private ranching industry be phased out of our public, protected land.

Before last weekend, I was a Clover Farm customer, buying a gallon from my local grocery store every few days. One visit to McClure Farm in Point Reyes National Park completely changed my mind on the dairy industry, and my household has moved to a plant based diet. I thought my milk would come from a lush green hill in Marin county, not a decimated brown stretch of nothing but feces and flies for miles and miles. This industry is very obviously destroying the land and polluting our water.

Most importantly, we must protect our native wildlife. Our small number tule elk can not be pushed to extinction. Shooting our elk cannot be the best solution to this problem. Please, have a heart, and do what you know is right for the land, our animals, and our citizens.

A very concerned Bay Area native,  
Amber Tysor

**From:** Sage Wolfe <swolfe@gmail.com>  
**Sent:** Tuesday, October 6, 2020 11:25 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Plans for Point Reyes

Director Ainsworth,

I am asking you to step up and use your power to intervene on behalf of our beautiful coastal ecosystem in California. The National Park Service (NPS) has proposed the expansion of ranching activities at Point Reyes National Seashore. The native Tule elk, already suffering dehydration due to no water source and lack of habitat due to the prevalence of ranching, will be squeezed to the brink of extinction under this new plan. Despite 91% of Californians opposing ranching in our vital seashore, NPS wants to expand the number and scope of activities. We can't allow this to happen in our own state against our will.

This is a national park. It ought to be the most protected land on the planet, but we're allowing ranchers to spread liquified manure on the ground. When it rains, that runs off into the water and turns into algae blooms that chokes off life in the sea — in the Greater Farallones National Marine Sanctuary. Doing that anywhere is inexcusable, but to dump it in a marine protected area that whales migrate through is a real disgrace on California. Resources need to be deployed to understand the scale of this problem. I ask you to direct the California Department of Fish and Wildlife to conduct an impact assessment and water quality tests on the damage to Drakes Bay due to runoff in the area. Please help stop National Park Service Director Woody Smeck from signing this plan.

Ranches have a place: inland. Responsibly managed and on private land. Away from vulnerable populations and vital ecosystems. These folks have been given decades to move. Please, they need to go to where their impact can be minimized.

Regards,  
Sage

## Plan B of the Environmental Impact

Barbara Sebastian <barbarasebastianartist@gmail.com>

Tue 10/6/2020 9:16 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

I am writing to please help preserve the Tule Elk at Pt. Reyes National Seashore. There is a recommended Plan B of the Environmental Impact Statement to expand ranching and shooting of the Tule Elk in this National Park. Tule Elk are wildlife and should be saved and allowed to live in their habitat.

In 1962, when this National Seashore was created, ranchers were paid a lot of money to leave the area within 25 years (1987). But, they are still there! This absolutely jeopardizes the future of our parks, wildlife, and health of our ecosystem. If you take a look at this area, the ranch land is very bland with dirt and feces. The area where the Elk exist is green and lush. Elks eat the greens but do not pull up and eat greens and roots as cows do. That helps to destroy the ecosystem locally. There is a plan to expand the ranches, kill the Elk, and create more factory and industry. This is horrible for our ecosystem and for wildlife, and, for a National Park. The Park should prioritize wildlife, our ecosystem, and not commercial industries. Also, one of the Elk herds is captive behind the fence. Wildlife should not be fenced in without much water, and, none should be shot!

Please save the Elk ❤️

Hopefully,  
Barbara Sebastian

**PRNS- businesses**

Lonna Richmond <lonnajean@gmail.com>

Tue 10/6/2020 7:40 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Hello Coastal Commissioners,

Would you please take four minutes and watch this honest video that Skylar Thomas did about sustainability?

<https://www.youtube.com/watch?v=IKdylin4n8g&feature=youtu.be>

Please keep an open mind. Knowledge is an obstacle to understanding.

Thank you,  
Sincerely with gratitude,  
Lonna Richmond  
185 Sunset Way  
Muir Beach, CA 94965



## **Pt. Reyes National Seashore/ tule elk**

Lonna Richmond <lonnajean@gmail.com>  
Mon 10/5/2020 8:31 PM  
To: Coastal Point Reyes Management Plan

Dear Coastal Commission:

According to the Park Service: NPS's mission is to "conserve the scenery and the natural and historic objects and wildlife therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

What started out as a win-win for ranchers and dairies being able to live and work within the confines of a National Park has devolved and what was once iconic coastal prairie has been turned into a veritable dust-bowl. Now that the dairy and beef businesses are floundering, these "squatters" want to diversify and expand, rather than move out like they were paid to do 58 years ago. PRNS management has become as twisted as the miles of barbed wire fencing that zig-zags around our national parklands at Pt. Reyes. I don't know how many miles of fencing there are, but under the new management plan, they want to add an additional 24 miles, all to protect the land and water for the cows; thereby leaving the endemic, fenced in tule elk herd, i.e. wildlife, to die of thirst and/or malnutrition.

These indigenous elk have been brought back from near extinction - a huge success story for PRNS, yet now they are struggling to survive with a cruel taskmaster that keeps them fenced in. People from all over the world come to see these magnificent and majestic tule elk, found only in California, with a total population of around 5700 animals. In Pt. Reyes alone there are around 500 elk and roughly 6500 cows. The Park Service says they must "cull" the elk, which means kill the elk, because they are exceeding the carrying capacity. What about the carrying capacity of cows?

This is not an argument against ranching and dairy businesses, but it is an argument for them to move off our public lands and let the tule elk roam as they once did, before this land was stolen from the Coast Miwok. Who, by the way, stewarded and revered the lands they were blessed to live upon, not like the private businesses who have now degraded, eroded and polluted it.

Sincerely,

Lonna Richmond  
185 Sunset Way  
Muir Beach, CA 94965

From: Phyllis Beals <phyllisbeals@gmail.com>  
Sent: Monday, October 5, 2020 6:45 PM  
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
Subject: Elk Killing at Point Reyes

Dear John,  
I am writing to urge you to oppose Plan B on the Environmental Ompact Statement for Point Reyes.  
Please, I beg you, do not do this!  
Most Sincerely,  
Phyllis Beals  
Santa Rosa

Sent from my iPhone

**From:** Sophia <bookworm@seanet.com>  
**Sent:** Monday, October 5, 2020 6:12 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Do Not Kill Tulle Elk

We have been here before with the native buffalo, and that is a shameful story in our history. Do not repeat this mistake with the Tule Elk.

Do not kill the indigenous Tule Elk. They are under the protection of the National Parks Service, and the National Parks belong to the citizens of the United States.

There are more privately owned cattle in Point Reyes National Seashore than there are Tule Elk worldwide. Do not go against citizens' demands, do not kill the Tule Elk.

Please act urgently to prevent the killing of these elk.

Sophia

**From:** Pacific Door <pacific.door@yahoo.com>  
**Sent:** Monday, October 5, 2020 5:56 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes National Seashore

*John Ainsworth:*

*Please oppose expanded ranching and the killing of Tule elk at Point Reyes National Seashore, as recommended in Plan B of the Environmental Impact Statement.*

*Can you help to stop this travesty? Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.*

*Elk freely roamed the California coast long before ranchers arrived. Preserving biodiversity on planet Earth is more important than humans doing more ranching. We must adapt our culture to allow other species to survive, and maintaining a particular ranching tradition is not a priority above preserving biodiversity. We should take down fencing and allow native wildlife free rein in our national parkland.*

*Thank you for your consideration.*

*Philip Purpuri  
Santa Cruz, CA*

## Point Reyes National Seashore (PRNS)

Susan Fischer <sue\_rd\_badger@yahoo.com>

Mon 10/5/2020 3:36 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Dear California Coastal Commission,

I am concerned about an environmental issue playing out in California's own Point Reyes National Seashore (PRNS). The park service is updating their General Management Plan and recently announced that they will not only allow dairy and ranching operations to continue within the national park, but will even allow them to expand their operations to include additional ventures such as row crops, chickens, pigs, and on-site slaughter, to name a few. Production (meat, milk, etc.) is not compatible with the National Park Service (NPS) mandate to manage all national parks in a manner which provides maximum protection, restoration and preservation of the natural environment for generations to come. Private ranching at the seashore has resulted in overgrazing, water pollution from millions of pounds of manure, invasive weeds, and the reduction of native species, including those protected under the Endangered Species Act. I hope that the CCC will investigate the water pollution caused by ranching and dairy operations within the PRNS.

On my visit to PRNS two weeks ago, I was saddened to drive for miles while witnessing the modern Dust Bowl of decimated barren land along Pierce Point Road--due to the dairy cows. The deep rooted native grasses are absent and replaced with shallow rooted weeds and compacted soil. When visiting this same area in winter, I often view cows wading in a slurry of manure and mud. The absence of native grasses allows for runoff and erosion. Cattle manure is sprayed on parkland and then washes into creeks with the winter rains. Kehoe creek is one of the most polluted creeks in California and is located in PRNS. Kehoe creek then flows into the Pacific, impacting freshwater and marine species. Cattle manure carries a contagious fatal disease, John's disease, that has infected Tule elk in the park. I would think that the problem of manure running into creeks and then into the ocean would be of concern to the Coastal Commission.

I am also concerned that the park's preferred management plan would allow for the culling of the Tule elk. The Tule Elk are a rare subspecies of elk found only in Ca and are currently at only 1% of their original population. The PRNS is the only national park where we find these amazing elk. They are a native umbrella species that were already saved from extinction in the past. The total number of fenced and free-range Tule Elk in the PRNS is 660. The number of cows on land managed by PRNS is over 5000. Tule Elk graze in manner that is beneficial to and allows for the return of native grasses. The native grasses in return allow for rich soil and stop the runoff and erosion caused by cattle grazing.

As documented above, I oppose expanded ranching and culling of Tule elk at PRN as recommended in the park services preferred Plan B of the General Management Plan Amendment. Please step in and save this national park from the destruction caused by ranching and dairy interests. We should be protecting and preserving our national parks for generations to come. Please urge further inquiry into the environmental problems caused by the cattle, such as water quality tests, before NPS Regional Director Woody Smeck signs this disastrous plan.

Thank you for taking the time to consider my concerns.

Sincerely,

Susan Fischer  
2735 Cherry Lane  
Walnut Creek, CA

## Comments on Point Reyes National Seashore

Jeanine Strobel <jestrobel12@gmail.com>

Mon 10/5/2020 3:17 PM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Please, honor the spirit of Point Reyes. It is a natural treasure and must be protected. Say no to Plan B. I am extremely concerned about and opposed to the current Plan B recommended by the Park Service for Point Reyes National Seashore. Point Reyes is a rare and precious place where we can see native wildlife and coastal prairie. I believe preservation of wildlife and the natural coastal environment must be the priority for PRNS, not supporting private ranches that are harming the environment and threaten wildlife.

Having been born and raised in San Francisco, Point Reyes has been a place I have cherished all my life. I have beautiful memories of enjoying the seashore with my family. As I am learning more about the natural world, I am disheartened by the tremendous damage being caused by these private ranches on our public land.

The biodiversity is what makes Point Reyes great, it is what brings in tourists and income from tourism, it is why PRNS is an international destination for birdwatchers. PRNS was bought by the public from the ranchers in 1962. They were generously given 25 years to gradually relocate the ranches. Thanks to powerful lobbying, the ranchers are still there, long past the agreed upon deadline in 1987.

Another pride and joy of Point Reyes are the amazing, wild Tule Elk. Plan B will allow shooting of Tule Elk to accommodate cattle. This is absolutely unacceptable and flies in the face of the purpose of our national parks – to preserve wildlife and the natural environment.

Please, protect the Tule Elk. 91% of the public comments to the National Park Service support preserving the Tule Elk and phasing out the cattle ranches from Point Reyes.

**From:** Caroline Bering <towie56@yahoo.com>  
**Sent:** Monday, October 5, 2020 1:28 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Tule elk at Point Reyes National Seashore

I am writing to ask you to step in to help save the Tule elk at Point Reyes National Seashore. The final management plan for them has been released by the Park Service, and it is up for a 30 day waiting period. If this plan passes it will kill wildlife while industry in the park expands. It ignores the parks own Environmental Impact Statement and shows the catastrophic impact ranches have on the ecosystem. This plan ignores public comments favoring a phase out of ranching and the ecosystem being restored. The National Park Service is being negligent in the management of these elk. The largest herd are trapped behind an 8-foot fence. They are being starved of food and water. The Park Service won't provide any water for them. Please encourage the park not to sign this final plan B of their Environmental Impact Statement. Please urge water quality tests and a supplemental environmental impact report on wildfires and drought. Please tell the park to choose wildlife, healthy ecosystems and be a leader in the fight to protect biodiversity. Thank you

Caroline Bering



## **Urgent: please assess the impacts of the NPS Final EIS for Point Reyes National Seashore**

Lisa Stanziano <lisa.stanziano@gmail.com>

Mon 10/5/2020 10:13 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Dear Coastal Commission Staff,

There is a public health hazard produced by the private ranches and dairies in Pt. Reyes National Seashore, one of our nation's most beloved national parks. The Regional Director of the National Park Service (NPS), plans to sign off on a management plan of the national park (Plan B). **I am writing to ask you to do whatever you can to STOP the sign-off on Plan B until further environmental impact studies can be done on the proposed introduction of chickens, goats, and row crops.**

I am part of a growing group of biologists, ecologists, public health professionals, activists, and concerned citizens who believe that this management plan harms the land and wildlife, and is an illegal and immoral act.

Through my research I learned that the fecal coliform levels are astronomically high at Point Reyes from the dairy manure. I am concerned, especially during COVID-19 times, that polluted water and crowded cattle operations may be a petri dish of infectious diseases that could harm human health in our national park and seriously affect the ecosystem of the Pacific coast.

An analysis of 7K+ public comments on the plan EIS showed that 91.4 percent of those who commented favor the removal of cows in the park. Cows produce massive amounts of manure that pollute park creeks and run into the ocean. Comments that favored continuing ranching/dairies comprised 2.5 percent. The choice to PHASE OUT ranching seems clear but the NPS has announced it wants to EXPAND them to allow other types of livestock AND to kill native Tule elk.

The coastal waters near Point Reyes National Seashore are vital to so many marine species: seals, whales, sharks, migrating salmon, and more. Please do whatever you can to stop the NPS Plan B management plan from moving forward until a thorough impact assessment of the expanded livestock and row crops is done.

Sincerely,

Lisa Stanziano  
San Francisco, CA

## Please help regarding the future of Point Reyes National Seashore

Ken Bouley <kbouley@fico.com>

Mon 10/5/2020 10:06 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc:

- Chance Cutrano <ccutrano@rri.org>

Dear Coastal Commission:

I'm writing you to request and urge you to intervene with respect to the Proposed General Management Plan in Point Reyes National Seashore. The proposed plan is bad for the environment, bad for the public, and bad for wildlife, especially the native tule elk, some of which will be killed under the proposed plan.

The NPS, supported by Senator Feinstein, Representative Huffman, and others, is selling out the public to satisfy some influential interests. It's an outrageous betrayal and an abject misuse of public lands.

- The Park's own EIS is damning of the ongoing operations, including an inventory of methane, e coli in the streams, erosion, invasive species, trampled native vegetation, habitat displacement, impaired public access, and more.
- The "diversification" (allowing the ranches to expand to keep chickens, pigs, sheep and goats) will cause inevitable conflict with the predators in the park.
- Ranching is the single biggest source of greenhouse gases in the park.
- There are more cows in Point Reyes than there are tule elk left in the world.
- This sets a dismaying precedent for political sale of allegedly protected public lands to private profit commerce.

We expect so much more from our National Parks.

As a volunteer, I ran a study for the Renewal Resource Institute of the over-7,600 public comments on the proposed plan, and the public is overwhelmingly opposed to the plan of record. The NPS was obliged to collect comments under NEPA, and certainly "checked the box," but now somehow is brazenly disregarding the lopsided public outcry.

- Over 90% of the 7,627 commenters oppose the plan of record.
- Over 94% of all comments who expressed support for any particular plan, endorsed Alternate F, which phases out all commercial operations in the park over 5 years.
- Only 2.3% expressed support for ongoing ranching and dairies in the park. Many of these people stand to directly gain financially from the plan proposed. More people expressed support for bike lanes than ranches.
- Although it is true that the NPS narrowly defined "substantive" public comments to avoid giving the appearance of a vote, it is also true that they characterized simple statements pointing out that native species should not be killed to subsidize harmful private commerce as "non-substantive."

October 4, 2020

Dear Calif. Coastal Commission,

I am writing to you to please help preserve the Tule Elk at Pt. Reyes National Seashore. There is a recommended Plan B of the Environmental Impact Statement to expand ranching and shooting of the Tule Elk in this National Park. Tule Elk are wildlife and should be saved and allowed to live in their habitat.

In 1962, when this National Seashore was created, ranchers were paid a lot of money to leave the area within 25 years (1987). They are still there! This absolutely jeopardizes the future of our parks, wildlife, and health of our ecosystem.

If you take a look at this area, the ranch land is very bland with dirt and feces. The area where the elk exist is green and lush. Elks eat the greens but do not pull up & eat the roots as cows do. That helps to destroy the ecosystem locally. There is a plan to expand the ranches, kill the elk, and create more factory and industry. This is horrible for our ecosystem and for wildlife, and, for a National Park. The Park should prioritize wildlife, not commercial industries.

One Elk herd is captive behind the fence. Wildlife should not be fenced in, and, none should be shot!

Please save the Elk.

Sincerely,

Barbara Sebas

If anyone at your office would like more information on the analysis, what we found, how we read the comments, etc., please reach out and I would be happy to discuss it. Full details are available at the link below.

California State agencies often raise the bar where federal agencies fail. I believe the Coastal Commission is in a position to put the brakes on this injustice. Please help.

Sincerely,  
Ken Bouley  
34 Drakes Summit Road  
Inverness CA 94937

415 446-6038 (o)  
415 259-1332 (m)

PS The study can be found here: <https://restoreptreyesseashore.org/comments-to-draft-plan/>

**From:** Jenna Kim <jennakim5408@gmail.com>  
**Sent:** Saturday, October 3, 2020 4:32 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Protect the tule elk

Hello, my name is Jenna Kim. I live in Sacramento, California. I am calling you to ask you to step in to help save the Tule elk in Point Reyes. Point Reyes has released their final management plan, it is up for a 30-day waiting period. The plan expands industry in the park and kills wildlife. It ignores the park's own Environmental Impact Statement showcased the detrimental impact ranches have to the ecosystem. It ignores the public comments favoring a phase of out ranching and a restoration of the ecosystem. The National Park Service is being negligent in their management of the elk. The largest herd of these rare elk are trapped behind an 8-foot fence. They have inadequate food and water and the Park Service will not provide water. Please tell the park to NOT SIGN their final plan. Please tell the park to choose wildlife, healthy ecosystems and be a leader in the fight to protect biodiversity.

**From:** kcluster4756@roadrunner.com <kcluster4756@roadrunner.com>  
**Sent:** Saturday, October 3, 2020 4:04 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Tule Elk at Point Reyes National Seashore

Dear Mr. Ainsworth-

I strongly oppose the plan for expanded ranching and shooting of Tule Elk at Point Reyes National Seashore, recommended in "Alternative B" of the Environmental Impact Statement.

There must be further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.

Ranching is extremely bad for the environment- for the soil, the water, the air & our health as well. It is also responsible for the loss of much of California's biodiversity. This is not a plan that should go forward. Ranchers should not be getting taxpayer handouts to pollute public wildlands.

Instead, I support Alternative F, which would phase out private ranches over five years, remove fencing to allow Tule Elk to roam free, and improve opportunities for the park's 1.7 million annual visitors.

Thank you for your attention to this important matter,

Kiersten Cluster

Los Angeles

**From:** Kimberley Richardson <kimberleymaerichardson@gmail.com>

**Sent:** Saturday, October 3, 2020 10:13 AM

**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

**Subject:** what will you tell your grandchildren when they ask where the Tule Elk went?

...when they ask why you prioritized the cruel and failing dairy industry over natural wildlife?  
Apart from the ethical question, how crazy is it to have a dairy industry in a state with perpetual drought?

Please do the right thing.

Thank you



Jeanine Strobel  
427 Enfrente Road, #B  
Novato, CA 94949

John Ainsworth, Executive Director  
California Coastal Commission  
455 Market Street, Suite 300  
San Francisco, CA 94105

October 2, 2020

Dear Mr. Ainsworth,

I am extremely concerned about and opposed to the current Plan B recommended by the Park Service for Point Reyes National Seashore. Point Reyes is a rare and precious place where we can see native wildlife and coastal prairie. I believe preservation of wildlife and the natural coastal environment must be the priority for PRNS, not supporting private ranches that are harming the environment and threaten wildlife.

Having been born and raised in San Francisco, Point Reyes has been a place I have cherished all my life. I have beautiful memories of enjoying the seashore with my family. As I am learning more about the natural world, I am disheartened by the tremendous damage being caused by these private ranches on our public land.

The biodiversity is what makes Point Reyes great, it is what brings in tourists and income from tourism, it is why PRNS is an international destination for birdwatchers. PRNS was bought by the public from the ranchers in 1962. They were generously given 25 years to gradually relocate the ranches. Thanks to powerful lobbying, the ranchers are still there, long past the agreed upon deadline in 1987.



**From:** Maxwell Clark <ryan16c@gmail.com>

**Sent:** Friday, October 2, 2020 7:15 PM

**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

**Subject:** URGENT: Please voice your opposition to the proposed land use management plan for the Point Reyes National Park

Hi John,

I'm writing to implore you to oppose the proposed land use management plan resulting from the recent EIS published by the NPS.

Over the planning process they have received roughly nine thousand comments from the public who overwhelmingly (over 90%) opposed continued ranching on the public, protected lands. The proposed alternative plan also allows for the expansion of existing ranches and dairies as well as authorizing ranchers to cull tule elk they subjectively determine are a risk to their livestock.

Please don't allow our democracy stand as a farce. The public has spoken, but has not been heard. Ranching on the park was intended to phase out as agreed to in the original government acquisition of the land, but ranchers have been given extensions year after year in direct defiance of the original terms of the agreement.

The laundry list of ways in which the land is mismanaged under the current lessees (ranchers) is extensive. The damage to our fragile coastal ecosystems will take decades to repair and any further expansion might further degrade biodiversity beyond repair. Let your legacy be that of championing public lands for public use. Be the leader who restored public land which is currently already facing threats from wildfires all over the state and needs all the help it can get. We need you.

Please oppose Alternative B and help the public help reclaim the land that is currently only nominally ours.

Yours,  
Maxwell

**From:** Katherine Dalessi <dale8682@eduhd.k12.ca.us>  
**Sent:** Friday, October 2, 2020 5:10 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Tule Elk

I oppose expanded ranching and shooting Tule elk at Point Reyes National Seashore, recommended in Plan B of the Environmental Impact Statement. Can you stop this travesty? Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.

**From:** Tony Sehgal <tcs1121@gmail.com>

**Sent:** Friday, October 2, 2020 11:54 AM

**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

**Subject:** Remove taxpayer subsidized ranches and dairies from Point Reyes National Seashore

Dear Executive Director John Ainsworth:

The National Park Service is allowing environmentally destructive private cattle ranching and dairies on public land at Point Reyes National Seashore. This must be stopped. The impacts on wildlife and water quality are significant.

This is a violation of democratic principals as over 91% of the public has voiced their opinion to the Park Service that they want all ranching and dairies to leave the National Seashore. This public land is being leased by private ranchers who were paid generously to leave the Seashore in 1962 and given 25-year leases so they had time to close up shop.

These taxpayer-subsidized ranches are costing the public millions of dollars in maintenance and management fees and these activities are destroying the land, water, and wildlife in the Seashore.

Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.

Please do anything you can to stop this assault on democracy and environmental justice.

Future generations will truly appreciate your actions on this issue.

Please visit this website for more information: [usa.org/dontshootelk](https://usa.org/dontshootelk).

Kind Regards,

Tony Sehgal

From: Susanna Praetzel <spraetzl@sonic.net>  
Sent: Thursday, October 1, 2020 6:13 PM  
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
Subject: No Agriculture in Pt Reyes National Park!!!

Dear Commissioner,

I am a third-generation Marin native. I love our beautiful land.

I took part in a powerful protest today out in Pt Reyes. Did you know the National Park Service has agreed to a new plan that will expand beef & dairy ranches on our National seashore, and add pigs, goats, and slaughterhouses?

The plan also includes KILLING native, endangered Tule Elk 😞. Only 1% of these beautiful animals remain. This is disgraceful!

I'm so grateful that at least 300 protesters showed up to save our beautiful, endangered land & wildlife. We have 30 days to stop this criminal plan!! I am writing to You to please stop this criminal plan. Agriculture is already ruining Pt. Reyes— both the overgrazed land and the feces-filled water.

That land is sacred and should not be a home for disgusting beef and dairy ranches!

These ranches are cruel, especially dairy— where newborn calves are stolen from their grieving mothers and caged in a tiny "hutch".

Please do what is right for environmental conservation! Please stand up and stop this sickening plan.

Thank you!

Susanna Praetzel

**From:** aquawoman <aquawoman@protonmail.com>  
**Sent:** Thursday, October 1, 2020 11:28 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Tule Elk & Alternative F

*Dear Mr. Ainsworth-*

*We strongly oppose the plan for expanded ranching and shooting of Tule elk at Point Reyes National Seashore, recommended in "**Alternative B**" of the Environmental Impact Statement. There must be further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.*

*Ranching is extremely bad for the environment- for the soil, the water, the air & our health as well. It is also responsible for the loss of much of Californian's biodiversity which is tragic and wrong. This is not a plan that should go forward. Ranchers should not be getting taxpayer handouts to pollute public wildlands.*

*We are also outraged at the needless deaths from starvation and thirst because of ranchers. There are more cattle in Point Reyes than there are tule elk left in the world.*

*Instead, we support Alternative F, which would phase out private ranches over five years, remove fencing to allow Tule elk to roam free, and improve opportunities for the **park's** 1.7 million annual visitors.  
Thank you for your time and attention.*

**Heather Wilson**  
**Los Angeles 90065**

**From:** Marlene Goodman <gmarlene109@gmail.com>  
**Sent:** Thursday, October 1, 2020 11:28 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Tule Elk

*Dear Mr. Ainsworth-*

*We strongly oppose the plan for expanded ranching and shooting of Tule elk at Point Reyes National Seashore, recommended in **"Alternative B"** of the Environmental Impact Statement.*

*There must be further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.*

Ranching is extremely bad for the environment- for the soil, the water, the air & our health as well. It is also responsible for the loss of much of Californian's biodiversity which is tragic and wrong. This is not a plan that should go forward. Ranchers should not be getting taxpayer handouts to pollute public wildlands.

We are also outraged at the needless deaths from starvation and thirst because of ranchers. There are more cattle in Point Reyes than there are tule elk left in the world.

Instead, we support Alternative F, which would phase out private ranches over five years, remove fencing to allow Tule elk to roam free, and improve opportunities for the **park's** 1.7 million annual visitors.

Thank you.

Marlene Goodman  
13226 Moorpark Street  
Sherman Oaks, CA 91423  
818-389-1924

**From:** Garril Page <obility@comcast.net>  
**Sent:** Thursday, October 1, 2020 11:28 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Pt. Reyes National Seashore

Dear Sir:

Please, urge further inquire into National Park Service General Management Plan for Pt Reyes National Seashore.

Their proposed plan endorses usurpation of public lands for private use (national park lands are fenced off and rezoned to allow private ranch uses), increased and expanded ranching that fouls the waters (water pollution in a public marine and recreation area), recommended manure-spraying and cow over-population increases risk of visitors' exposure to potentially zoonotic diseases which also are passed on to native elk (Johnes Disease, Chronic Wasting Disease, Brucellosis). Penned wild elk have no way to escape exposure to cattle-boure disease, just as they had no way to avoid death by drought under NPS 'management'. If elk are to be culled, it should be done humanely by trained marksmen, not by withholding water.

Pt Reyes is the only nat'l park in which Tule elk and marine life (whales, seals/lions) can be seen on the same visit; this provides a unique visitor experience. NPS wishes to commercialize and infringe on Pt. Reyes natural attributes with a divisive, unpopular plan fomented by ranching interests.

Thank you,

Garril Page  
San Anselmo



**From:** Carol Bordin <wetlands2save@gmail.com>  
**Sent:** Thursday, October 1, 2020 10:49 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes National Park's Tule Elk

Dear Mr. Ainsworth,

I am writing this letter to you today to express my concerns about the policies of the National Park Service with direct regards to the Point Reyes National Park's Tule Elk. These Elk belong to all of us and the mere slaughtering of them on National Park Land is an atrocity and very sick!

These Elk deserve to be protected, as well as their habitat both on and off site. They need to access clean water and food and be allowed to be WILD and FREE, unharmed by humans or their government agencies. I am strongly urging you to let the elk have access to watering areas on adjacent lands, and be protected from harm and harassment in their accustomed way of living.

Consider allowing the elk to roam amongst the cattle on adjacent properties, or eliminating non-native species (cattle, livestock) on lands that are in direct conflict with the mission of the NPS...strongholds for native plants and animals and to live unharmed and wild in the National Parks across the USA, and allowing the public to enjoy these parks in perpetuity!

Too many of our amazing species of wildlife are having conflicts with the meat-making money industry/companies and putting unnecessary and undo stress on our beloved native wildlife, elk, wolves, and orcas, and their habitats/ecosystems. Livestock are not native to California, the Tule Elk are! Please protect and preserve the California Point Reyes NP Tule Elk! They are counting on you, and us together, untied on their behalf!

Respectfully yours,

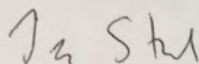
Carol Bordin  
Salish Sea, Washington State

Another pride and joy of Point Reyes are the amazing, wild Tule Elk. Plan B will allow shooting of Tule Elk to accommodate cattle. This is absolutely unacceptable and flies in the face of the purpose of our national parks – to preserve wildlife and the natural environment.

Please, protect the Tule Elk. 91% of the public comments to the National Park Service support preserving the Tule Elk and phasing out the cattle ranches from Point Reyes.

Please, honor the spirit of Point Reyes. It is a natural treasure and must be protected. Say no to Plan B.

Thank you,

A handwritten signature in dark ink, appearing to read "Jean Strobel". The letters are cursive and somewhat stylized.

Jeanine Strobel

**From:** bach301@aol.com <bach301@aol.com>

**Sent:** Wednesday, September 30, 2020 10:34 PM

**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

**Subject:** To the California Coastal Commission's Executive Director, John Ainsworth,

Dear Mr. Ainsworth:

Cattle ranching is one of the leading contributors to climate change and we in California are on fire.

If you are unaware of how public land management is murdering indigenous species so that cattle ranchers can expand their deadly empires with impunity because the government is behind them, then please look at Point Reyes, quite close to where I live.

My business and rental home were destroyed by the Valley Fire in Lake County in 2015, then I was effected by the Tubbs Fire in 2017 in Santa Rosa, and was also effected in the Kinkaid fire in 2019. Now they are getting more ferocious and we are getting sick of this. Action must be taken, and it's not to support people who perpetuate and increase the causes of climate change.

I suggest all factory farming end, and those areas be turned into animal sanctuaries (which would provide jobs and stop the devastating pollution of precious water, soil and air resources - and I'm not talking about sacrificing the cattle - I'm talking about stopping the rape and artificial population we perpetrate on these innocent beings so we can have a burger or a steak or a glass of milk, all of which create acidity in the human body and accelerate the leading causes of death in humans).

I also suggest we incentivize vegan chefs and restaurants in order to offer people healthier (for the planet and for humans) choices each time they eat out.

I also suggest that private cattle farms, like Ms. Audrey Denney has (who is running for office), and the McNear Ranch in Point Reyes, be phased into a different kind of work. Change is always frightening for those who have not learned to embrace and learn from it, however if we as a species are going to survive in California, we can help them transition to some new service to humankind that is kinder to our beleaguered planet, air, soil, and water.

Also, recently Gov Newsom passed a bill to create true motivation to reduce another major contributor to fossil fuels - ending the internal combustion engine. All types of oil extraction is deadly to us and our planet, and it's time to be forward-thinking in this area as well. California is a leader because we are perhaps the most affected because of these atrocious fires we continue to experience.

So, since all of our lives are at stake (literally a fire stake), please do not support expanding any kind of cattle ranching. Cattle ranchers have lobbied for centuries to have the government do their dirty work in killing off innocent animals that they perceive a threat to their "farms" and their "commodities (cattle)" and i can never support that. I do not see animals as commodities, they are living beings with their own rights to their lives, and what we are doing to them is killing us as well in multiple ways.

Please stand up to these people so steeped in "tradition" and their "heritage" that they are willing to kill the state of California: its people, its indigenous animals, and its beauty.

Thank you for your consideration, and may God have mercy on all our souls for the atrocities you may allow to be perpetrated,

Veronica Bach

(310) 980-9669

Mill Valley, CA

94941

**From:** Pam Youngquist <kali1111@bellsouth.net>

**Sent:** Wednesday, September 30, 2020 7:11 PM

**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

**Subject:** Oppose Alternative B on the Environmental Impact Statement for the Point Reyes National Seashore.

Dear Mr. Ainsworth,

I write in request that you oppose expanded ranching and the shooting of Tule elk at Point Reyes National Seashore, recommended in Alternative B of the Environmental Impact Statement. Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.

I grew up on the Point Reyes national seashore landscape. The elk that were brought back to their homelands of Point Reyes in the 70's, and were finally able to come out of extirpation status, would never have been hunted by park service for their "inconvenience" to the dairy/cattle industries. Nor would we have tolerated the fact that these wild animals are often victims of domestic cattle diseases. What happened to the Tule elk preserve, to the commitment to protect, defend and conserve the environments of this iconic indigenous animal? The displacement of wild animals from their habitat for the profit of dairy and cattle ranchers is not what we, the nations tax payers, signed on to support. It is the preservation of natural lands and all of its inhabitants that we support.

Please, if you would, take a moment to read these statements from NPS's own website regarding the vital importance of the wild animals they now wish to exterminate:

"Further conservation efforts resulted in an additional free-ranging herd being established at Point Reyes. In 1998, twenty-eight animals taken from the Tomales Point preserve were released in the wilderness area south of Limantour Beach. ***Reintroduction of tule elk to the National Seashore and the further establishment of the free-ranging herd has been an important component of the restoration of the natural systems historically found in this unique and treasured place.***"

"In 2012, over fifty-five elk inhabited the Drakes Beach area while over sixty-five remained in the Limantour-Muddy Hollow-Glenbrook area. By 2019, the populations had increased to 138 elk in the Drakes Beach area and 164 elk in Limantour-Muddy Hollow-Glenbrook area. ***Opportunities for wildlife viewing have been greatly enhanced by the presence of these herds, and visitors can expect to view and photograph tule elk at Point Reyes even if they never travel to the far end of the park and into the Tomales Point preserve.***"

**AND**

"Point Reyes National Seashore remains the only National Park unit where tule elk can be found. ***The majestic animals you see as you travel through the park embody the restoration of the dominant native herbivore to the California coastal ecosystem.*** They shape the landscape around them as they did for centuries before they were extirpated by humans. ***They symbolize the conservation of native species and ecosystem processes, one of the primary missions of the National Park Service.*** The tule elk's presence is treasured by visitors, photographers, naturalists, and locals alike. Their image has been expressed in the local folk art, numerous local and nationally published photographs, and even on the local trade/barter currency where they are depicted alongside cattle, coho salmon, and local produce as being emblematic of the community."

You, Mr. Ainsworth, are empowered in your position at this moment to stand with the ethical, moral and humane obligation to protect and defend these few precious Tule elk herds that remain in the world. Farmers and airB&B tourism butter your proverbial bread in Point Reyes at what cost to the natural world that has been so imperished, it brings us pandemics?

Please speak up to stop Alternative B from going forward.

Thank You,  
Pam Youngquist

**Pam Youngquist**  
**(413) 229-9013**  
**[pam@traditionalnaturopathiccare.com](mailto:pam@traditionalnaturopathiccare.com)**  
**[www.traditionalnaturopathiccare.com](http://www.traditionalnaturopathiccare.com)**

**From:** Ingrid Kingaard <ikingaard@gmail.com>  
**Sent:** Wednesday, September 30, 2020 3:37 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Tule Elk at Point Reyes National Seashore

Dear Mr. Ainsworth:

I understand your agency is planning to slaughter the Tule elk residing at Point Reyes. The reason given is to provide more space and resources for grazing cattle. I fail to see the logic in this plan, or even a suggestion of due diligence conducted on the part of the Coastal Commission.

Plan B of the Environmental Impact Statement expands commercial cattle ranching and destroys wildlife. The Plan ignores the park's own Environmental Impact Statement, which showcased the detrimental impact ranches have on the ecosystem. It also ignores the public comments favoring a phasing out of ranching and restoration of the ecosystem.

The National Park Service is being negligent and inhumane in terms of its management of the elk herd. The largest herd of these rare elk are trapped behind an 8-foot fence without food or water. The Park Service will not provide water to these animals, but would rather see them starve to death ... a very convenient means of disposal.

Plan B is a draconian approach to managing the ecosystem at Point Reyes. To actually gun down these animals is a hideous solution to management of public lands. Plan B must not be implemented and these animals need to be released to take care of themselves as they have for many years.

Respectfully,  
Ingrid Kingaard  
Folsom, CA

**From:** Olivia Rathbone <olivia@oaec.org>

**Sent:** Wednesday, September 30, 2020 9:41 AM

**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; gavin@gavinnewsom.com; Denryter, Kristin@Wildlife <Kristin.Denryter@Wildlife.ca.gov>; carey\_feierabend@nps.gov; pwr\_public\_affairs@nps.com

**Subject:** Please Protect Tule Elk in Point Reyes

Hello and thank you for your leadership in protecting California's priceless wildlife and open space!

Point Reyes National Seashore is one of the most biologically diverse spots on the California coast. It is home to 15% of all California biodiversity including several species found nowhere else on the planet. The beef and dairy industry have been allowed permits for commercial operations within the park boundaries year-round. Not only is the industry listed as one of the leading threats for several endangered species, but it is also noted as having led to high levels of pollution in the coastal watersheds making California's most precious water systems also some of its most polluted. The Tule Elk are not the problem. In fact, **there are more cows in the National Seashore than there are Tule Elk in the entire world.**

I oppose expanded ranching and shooting Tule elk at Point Reyes National Seashore, recommended in Plan B of the Environmental Impact Statement. Can you stop this travesty? Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan. Also please take down the Tomales Point Elk Reserve fence, provide Tule elk free access to fresh water, and transition away from private ranching in public parkland.

Thank you!

Olivia Rathbone

Director of Communications

Occidental Arts & Ecology Center

(707) 874-1557 x102

[olivia@oaec.org](mailto:olivia@oaec.org)

[www.oaec.org](http://www.oaec.org)

From: kathy gervais <kagvet@earthlink.net>  
Sent: Wednesday, September 30, 2020 12:07 AM  
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
Subject: Please help the Tule Elk of Point Reyes National Seashore

Dear Mr Ainsworth,

I believe it is time for the dairies leasing in the seashore leave and let the overgrazed pastures be restored to native coastal prairies. The pollution from the manure contaminates the watershed and the beaches and the coastal commission needs to step in and stop this. If the pollution is reduce, this will help the salmon runs and the shores. We need to be active in restoring our environment when we can. Please step in and make the National Park Service do their job of protecting the native ecosystem of Point Reyes , instead of helping private industry make money.

Thank you,  
Kathy Gervais  
15 Gann Way  
Novato, CA 94949



**From:** Margo Wagner <margowagnerca@gmail.com>  
**Sent:** Tuesday, September 29, 2020 9:52 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes National Seashore

Hello John,

My name is Margo and I am a surfer, backpacker and animal lover. Point Reyes is special to me and I want to ask for your help protecting and restoring it.

I wholeheartedly OPPOSE the plan to expand ranching and the shooting/killing of Tule Elk at Point Reyes National Seashore as described in Plan B. Can you please use your power and influence to stop this?

I value clean water, I value wild animals, I value a natural and healthy landscape. Please do what you can to protect this beloved and precious land and the Tule Elk.

Respectfully,

Margo

**From:** Robert Hall <bilgepump100@sbcglobal.net>

**Sent:** Tuesday, September 29, 2020 9:17 PM

**To:** careyfeierabend@nps.gov <careyfeierabend@nps.gov>; David\_Vela@nps.gov <David\_Vela@nps.gov>; Woody\_Smeck@nps.gov <Woody\_Smeck@nps.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>

**Subject:** Reject Alternative B. Support Alternative F of the General Management Plan amendment for Point Reyes National Seashore.

I strongly object to the Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore. I oppose the killing of native wildlife and the designation of commercial agriculture as the park's main use. Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit.

The native tule elk are an iconic part of the natural landscape of Point Reyes and are the only tule elk herds within the National Park system. There is no ecological justification or valid management reason for harassing, fencing, or shooting elk in the park. Commercial lease holders on our public lands in the park should not be dictating management policies that persecute the park's wildlife.

Alternative B does not manage commercial ranching leases to accommodate elk and other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil, and native vegetation. It sets a horrible precedent in expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs, and chickens, which will inevitably create additional conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B, and instead approve Alternative F, which would phase out dairy and beef cattle ranching, expand visitor recreation opportunities, and allow the elk to roam unmolested throughout the national park. Alternative F is the only option that prioritizes protecting the outstanding natural values of Point Reyes National Seashore for the public benefit.

**From:** Kathleen <majesticshelties@gmail.com>  
**Sent:** Tuesday, September 29, 2020 5:28 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Tule Elk

*Hello, my name is Kathleen McGuire. I live in Kansas. I am writing you in regards about the Tule Elk. Point Reyes has released their final management plan, it is up for a 30-day waiting period. The plan expands industry in the park and kills wildlife. It ignores the park's own Environmental Impact Statement showcased the detrimental impact ranches have to the ecosystem. It ignores the public comments favoring a phase of out ranching and a restoration of the ecosystem. The National Park Service is being negligent in their management of the elk. The largest herd of these rare elk are trapped behind an 8-foot fence. They have inadequate food and water and the Park Service will not provide water. Please tell the park to NOT SIGN their final plan. Please tell the park to choose wildlife, healthy ecosystems and be a leader in the fight to protect biodiversity.*

*Sincerely,  
Kathleen Munday*

--

\* \* \* \* \*

Warm Blessings  
Kat and Cal

\*~Magic, Cochise, Rodie, Gunner & Chief\*~  
\*~Lilly, Lacey, Annie, MiMi, Maggie & Arabella~\*

Contact Us 316.880.2995

Visit Our Homepage \*Majestic Shelties\*  
[www.majesticshelties.com](http://www.majesticshelties.com)

**From:** Rene <rkathomas@gmail.com>  
**Sent:** Tuesday, September 29, 2020 4:55 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes National Seashore, concerns about management plan

Dear Mr. Ainsworth,

I strongly object to the Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore. I am opposed to the designation of commercial agriculture as the park's main use and to the killing of native wildlife. Alternative B promotes private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit.

The native tule elk are an iconic part of the natural landscape of Point Reyes. These are the only tule elk herds within the National Park system. There is no ecological justification or valid management reason for harassing, fencing, or shooting elk in the park. Commercial lease holders on public lands in the park should not be dictating management policies that endanger the park's wildlife.

Alternative B does not manage commercial ranching leases to accommodate tule elk and other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil, and native vegetation. It sets an unacceptable precedent in the expansion of private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs, and chickens, which will inevitably create additional conflicts with other wildlife in the park.

I strongly urge you to encourage the Park Service to reject Alternative B, and instead to approve Alternative F, which would phase out dairy and beef cattle ranching, expand visitor recreation opportunities, and allow the tule elk to roam unmolested throughout the national park.

Alternative F is the only option that prioritizes protecting the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,

René Thomas  
Emeryville, CA

From: Susan T Diederichsen <my4new6mail@icloud.com>  
Sent: Tuesday, September 29, 2020 3:19 PM  
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
Subject: Elk

Please don't kill the beautiful elk. Just plain cruel. Such beautiful animals ... I drive up from Palo Alto occasionally in order to get to see them. Susan Diederichsen

**From:** Peg Bannan <pegbannan@gmail.com>  
**Sent:** Tuesday, September 29, 2020 1:33 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes National Seashore

Dear John,

This email is regarding Point Reyes National Seashore (PRNS). I'm asking you to intervene in the decision to expand ranching in the park.

Currently a few ranching families consume almost 30,000 acres of our/my park .... eliminating our/my access. This is wrong. It's not in the best interest of the public.

The native tule elk are "historically ", not the cows. The public, the tourists do not come into the park to look at cows.

Additionally, the ranches have not been good stewards of the land and polluted our/my park. The waterways within the park are among the most polluted in the entire state.

A handful of wealthy ranching families should not take priority over public access and native elk. The public have spoken and 97% want ranching phased out, not expanded as the park is planning.

Please support the public and preserving our land, John.

Thank you,  
Peggy Bannan

--

(Please excuse typos from my phone.)

Peggy Bannan

**From:** Angela Glover <ajglover1@comcast.net>

**Sent:** Tuesday, September 29, 2020 10:06 AM

**To:** gavin@gavinnewsom.com

**Cc:** gavin@gavinnewsom.com; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

**Subject:** Tule Elk

Dear Sirs,

I am writing today to save the Tule Elk at Point Reyes. First they were closed in by fencing taking most of their water sources away so many are dying from lack of water, and now they want to expand industry in our National park? The elk have as much right to live as cattle. I am outraged at that the plan to shoot them! This is horrible. Please help us save the Tule Elk by opposing Plan B of the environmental impact study. Please have them do a water quality test and a supplemental environmental impact report in drought and wildfires. Thank you

Angela Glover

27 Rosemary Ct.

Novato Ca 94945

[ajglover1@comcast.net](mailto:ajglover1@comcast.net)

**From:** Gina Ward <ginaward26@yahoo.com>  
**Sent:** Tuesday, September 29, 2020 8:33 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Thule Elk

For financial gain reasons, farmers are allowed to take over Federal Park Land and now wildlife is being decimated. The Thule Elk who are truly beautiful and attract visitors from all over the world are dying of thirst and are now going to be murdered because of financial greed. Even the park service does not want to have to do this but they must follow orders. The ordered murder o of these beautiful creatures can be stopped by YOU!

Please take swift action to end this slaughter of elk for financial gain on Federal Park Land!!!!  
THE GOVERNMENT IS SLAUGHTERING ELK FOR LAND THAT IS FEDERAL PARK LAND. THIS  
SHOULD BE ILLEGAL.!!!

I demand supplemental environmental review, and water quality testing to be done before the plan gets signed.



**From:** Ellen McCann <EllenM@rgrdlaw.com>  
**Sent:** Tuesday, September 29, 2020 7:34 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Tule Elk

You already know where this is going. Lots of justifiable outrage. Stand up for our wildlife and do all you can to stop the nonsense at Point Reyes. The people have spoken and yet they are ignored. We've got plenty of places for cows to exploit. Let's restore Point Reyes to how it is supposed to be. More than ever people need a little wildness.

Ranchers have huge lobbyist. Help the little people.

Stand up for the planet.

In kindness,

Ellen McCann  
1262 Amalfi Pl.  
Escondido, CA 92027

**From:** Mike Axinn <mike@121box.com>  
**Sent on:** Monday, September 28, 2020 10:00:26 PM  
**To:** careyfeierabend@nps.gov  
**CC:** David\_Vela@nps.gov; Woody\_Smeck@nps.gov; Dave\_Press@nps.gov; Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Alternative B for Point Reyes National Seashore

Dear Ms. Feierabend,

I strongly object to the Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore. I oppose the killing of native wildlife and the designation of commercial agriculture as the park's main use. Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit.

The native tule elk are an iconic part of the natural landscape of Point Reyes and are the only tule elk herds within the National Park system. There is no ecological justification or valid management reason for harassing, fencing, or shooting elk in the park. Commercial lease holders on our public lands in the park should not be dictating management policies that persecute the park's wildlife.

Alternative B does not manage commercial ranching leases to accommodate elk and other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil, and native vegetation. It sets a horrible precedent in expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs, and chickens, which will inevitably create additional conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B, and instead approve Alternative F, which would phase out dairy and beef cattle ranching, expand visitor recreation opportunities, and allow the elk to roam unmolested throughout the national park. Alternative F is the only option that prioritizes protecting the outstanding natural values of Point Reyes National Seashore for the public benefit.

You of all people should know that our parklands are for everyone's enjoyment, as well as for the protection of the land and the sentient beings living on that land — and not for commercial cattle grazing that only benefits the few while destroying habitat and contributing to green house gasses. Do the right thing, and reject Alternative B.

Thank you,

Mike Axinn | Founder & Producer | 310-795-8244

**From:** Bear McGuinness <bear.mcguinness@gmail.com>  
**Sent:** Monday, September 28, 2020 9:33 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes National Seashore

Dear Mr. Ainsworth,

When the Point Reyes National Seashore was established in 1962, the local ranchers were paid for their land and given generous leases to ease their move off what had become public land. The leases were extended and then extended again. Park management recently announced that it would implement a plan (Alternative B) that would extend the leases again for a 20-year period and allow the ranchers to expand their activities to include raising pigs, goats, chickens, row crops, set up farm stalls, and perhaps run B&Bs. If the paperwork is signed in a few weeks, the ranchers will be allowed to do all of the aforementioned *and* the park will help them out by killing native Tule elk, a species that almost became extinct thanks to European settlers. This is not good stewardship. It's another scam with the veneer of tradition to give it legitimacy.

The NPS has also not adequately considered the consequences of Alternative B. What will happen when foxes, bobcats, and coyotes inevitably hunt the chickens and goats? Where will row crops get water in a place that is already suffering from drought? How will the addition of fertilizer, even organic fertilizer, affect water quality? What's going on with the stagnant pools of cow excrement that are sprayed onto fields? How will the ranchers, now farmers, keep birds and rabbits from eating the crops? The Tule elk are already kept behind fences in some areas, which restricts their access to water and food and fragments habitat for all kinds of creatures. What kind of fences will keep the goats and pigs and chickens from escaping and how will these new barriers affect the movement of native animals? Some of the fields around the ranches are thick with invasive weeds, and I have spent a number of years volunteering in the park and trying to remove these weeds. What will the ranchers do to prevent the spread of even more invasive plants? So many questions, so few answers.

According to an article by Susan Ives, "more than 90 percent of the 7,627 comments submitted to the NPS oppose ranching in the national seashore (<https://marinpost.org/blog/2020/4/15/90-percent-of-public-comments-to-nps-plan-for-point-reyes-national-seashore-oppose-ranching>).” But park management stated a preference for Alternative B before the public comment period even began.

What's happening here won't just set a precedent for what could happen to public land everywhere. What might happen here could have consequences for land and water all along the California Coast. You could step in and ask park management to answer some of the questions that I posed here. You could demand water quality tests and environmental impact reports. There's so much at stake and no time to lose.

Thank you!  
 CB McGuinness  
 Point Reyes Station, California

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I've taken the liberty of adding some links to various articles and films that might interest you.

Ranching by the numbers  
<https://restoreptreyesseashore.org/by-the-numbers/>

This short (<10 minutes) film summarizes the issue.  
<https://restoreptreyesseashore.org/elkfilm/>

This is an even shorter film that show the damage that ranching has done to PRNS  
 Dairy of the Year  
<https://www.youtube.com/watch?v=Lwn9C3SYNoc>

PRNS general management plan

[https://www.nps.gov/pore/getinvolved/planning\\_gmp\\_amendment.htm](https://www.nps.gov/pore/getinvolved/planning_gmp_amendment.htm)

A short article about the issue in The National Parks Traveler. The comment Humphrey Ploughjogger wrote is just as or even more educational than the article.

<https://www.nationalparkstraveler.org/2020/09/national-park-service-moves-preserve-livestock-industry-point-reyes>

Judd A. Howell is a wildlife biologist and retired member of the US Department of the Interior who studied the Tule elk during the 1990s

<https://www.marinij.com/2020/09/25/marin-ij-readers-forum-for-sept-26-2020/>

Article in The Hill

<https://thehill.com/changing-america/sustainability/environment/517720-national-park-service-allows-for-the-killing-of>

**From:** Shakti Padmini <pinklotusslight@gmail.com>  
**Sent:** Monday, September 28, 2020 9:23 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** STOP this HORROR!

*My name is Shakti Padmini, with great sadness and disbelief I have been following the news on the Tule elk and the management plan. How is this possible? How any human being with a heart and conscience can do something so horrid? How can the park service - meant to protect wildlife - deceive their very purpose?*

*I'm asking you to wake up, stand tall and ABSOLUTELY NOT sign the final plan at Point Reyes National Seashore.*

*the plan ignores the detrimental negative effects the ranches have on the land (do you know there's more cows at PR Seashore - so called Protected Land (!) than Elk in the whole US?)*

*The plan ignores public opinion to PROTECT the ecosystem and phase out ranches (long, long overdue!)*

*The plan kills wildlife to protect industry (better say 'dying industry' = the negative effects of dairy on human health are far reaching and scientifically backed from all directions).*

*The plan supports degradation of the soil by commercial farming and contributes to global warming by increasing already abundant methane gases from manure and e-coli pollution*

*This is an ANTI-WILDLIFE plan, and you are supposed to be stewards of wildlife.*

*do not cave to political pressure from the ranching industry.*

**DO NOT SIGN THIS PLAN!!!**

*In addition, the plan supports inhumane treatment of cows: newborn calves being taken away from the mothers and suffering alone in plastic enclosures, male calves being killed for meat, females to grow up to be perpetually pregnant for milk never enjoying their babies, living short lives overexploited.*

*As for ranchers: There are other win-win options. Better for everyone.*

*Hold your power and proudly stand up to what you've meant to do: to protect wildlife.  
 DO NOT SIGN the plan.*

*Thank you.*

*Shakti Padmini*

**From:** Ellie Comings <elliecomings@gmail.com>  
**Sent:** Monday, September 28, 2020 7:55 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes Nat Seashore

Hi there John,

Speedy action is needed in Point Reyes National Seashore. The ranchers' leases, that were always supposed to be short-term, are being extended and expanded with allowances for adding additional livestock to the existing ranches. The current livestock operations have already deeply impacted the land, as the environmental impact study has shown. Being that the lease is up, and that we find ourselves in the middle of an omnicide as well as with worsening climate change, it's imperative that we restore these public lands to the most biodiverse and wild state as possible. ASAP.

Because the Park service is not doing their job of protecting the land, we need you to step up and do what you can to help prevent this from happening. We need your voice to state the obvious: that wildlife trumps private enterprise on Park lands. Especially in this current context of widespread climate collapse and land destruction.

We need you to act swiftly and strongly. Please do your part to act as the environmentalist that we know you are.

Thanks,  
Ellie

Short videos on the issue:

<https://www.youtube.com/watch?v=Qinv6CAs3h4&feature=youtu.be>

<https://www.youtube.com/watch?v=VXypxz6Mg8g&feature=youtu.be>

**From:** Carla Din <Carla@dintuitive.com>

**Sent:** Monday, September 28, 2020 6:30 PM

**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

**Subject:** Mr. Ainsworth, please oppose Pt. Reyes' EIS Plan B

Dear Mr. Ainsworth,

I am writing as a third-generation Californian out of grave concern for the National Park Service's management plans that include the killing of the majestic Tule Elk at Point Reyes National Seashore.

The final management plan is biased towards private ranching interests and ignores the negative effects the ranches have on the land including overgrazing, soil erosion, degradation of water quality by cattle, damage to endangered species habitat and other wildlife, and spread of invasive plants in the park.

The Plan also ignores the Park's *own* EIR where the vast majority of the 7,600 comments favored restoration of the ecosystem and opposed continued ranching.

It is unconscionable that the largest herd of the Tule Elk are trapped behind an 8-foot fence to appease ranchers. The Elk have inadequate food and water and are at risk of dying of thirst. I urge you to restore water to the Elk or you will perpetuate the horrendous situation of 2012-2014 where more than 250 elk (over half the herd) died during the drought.

Please do all you can to stop Plan B of the EIS and ensure that park managers act- as they should- as stewards of the land and maximize the protection of natural resources and our fragile ecosystem.

For a perspective from a Research Wildlife Ecologist who studied Tule Elk at Point Reyes National Seashore, grew up on a small farm in Montana and whose step-father raised cattle, please see this Marin Independent

piece: <https://www.marinij.com/2019/10/07/marin-voice-point-reyes-should-end-ranching-and-take-down-the-elk-fence/>

It concludes:

1. **Dairying and ranching**, except for a small dairy interpretive site, **should be ended within the next five years.**
2. **The 8-foot fence at Pierce Point should be removed.**

Thank you,

Carla Din

Oakland, CA 94611

[carla@dintuitive.com](mailto:carla@dintuitive.com)

**From:** dgberger22@mindspring.com <dgberger22@mindspring.com>  
**Sent:** Monday, September 28, 2020 4:33 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** NPS - Point Reyes opposition to Plan B

Dear Executive Director Ainsworth,

Please use your influence to oppose Plan B (shooting Tule Elk and expanding commercial cattle/dairy operations) on the Environmental Impact Statement for the Point Reyes National Seashore. Wildlife should not be shot in order to expand commercial enterprises on the **"protected"** National Park Land. We need more environmental reports on the drought and wildfires as well as water quality tests. Woody Smeck, National Park Service Regional Director, is set to sign this plan in just a matter of a couple of weeks. We need to act now to protect the coastline and the wildlife out in Point Reyes.

Can you please help? We need real leadership now because the NPS has forgotten their stated purpose and mission to protect and preserve. Just take a drive out there and see with your own eyes what the cattle do to the land not to mention other environmental impacts we have with the cows. Why kill the Elk who actually belong there and who **don't** negatively impact the land but enhance biodiversity?

Thank you so much for taking action to protect this beautiful coastline and the wildlife therein!

Very truly yours,

**Deena Grady Berger, J.D**



**From:** Virginia Doyle <vdoyleandjdoyle@gmail.com>  
**Sent:** Monday, September 28, 2020 4:31 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** The elk at Pt. Reyes

Dear Sir,

Please do all that you can to save the elk at Pt. Reyes. They are so much a part of what visitors to Pt. Reyes come to see and to teach their children about.

Thank you.

Virginia Doyle  
10 Tamalpais Circle  
Belvedere, CA 94920

**From:** Jeremy Roth <acidinjury@yahoo.com>  
**Sent:** Monday, September 28, 2020 3:40 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Stop the Point Reyes Management Plan and save the Tule Elk

Dear Mr. Ainsworth:

*Hello, my name is Jeremy Roth. I live in Dillon Beach, CA. I am writing you to ask you to step in to help save the Tule elk in Point Reyes. Point Reyes has released their final management plan, it is up for a 30-day waiting period. The plan expands industry in the park and kills wildlife. It ignores the park's own Environmental Impact Statement showcased the detrimental impact ranches have to the ecosystem. It ignores the public comments favoring a phase of out ranching and a restoration of the ecosystem. The National Park Service is being negligent in their management of the elk. The largest herd of these rare elk are trapped behind an 8-foot fence. They have inadequate food and water and the Park Service will not provide water. Please tell the park to NOT SIGN their final plan. Please tell the park to choose wildlife, healthy ecosystems and be a leader in the fight to protect biodiversity.*

Thank you,

Jeremy

**From:** Erica Milsom <ericaohERICA@gmail.com>

**Sent:** Monday, September 28, 2020 3:33 PM

**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; gavin@gavinnewsom.com; Denryter, Kristin@Wildlife <Kristin.Denryter@Wildlife.ca.gov>

**Cc:** Ho, Krystal@Wildlife <Krystal.Ho@Wildlife.ca.gov>

**Subject:** Regarding the Tule Elk

Dear Governor Newsom, Mr. John Ainsworth, and Ms. Kristin Denryter,  
I wanted to write to you all regarding an issue that's very close to my heart, the upcoming amendment to the General Management Plan regarding Point Reyes National Seashore and the wildlife there.

In the midst of so many other tragedies that our state and nation and WORLD are experiencing right now, this one may seem small and administrative. But you hold in your hands the lives of some of the most precious and rare animals on the planet, our Tule elk.

**I oppose expanded ranching and shooting Tule elk at Point Reyes National Seashore, recommended in Plan B of the Environmental Impact Statement.** And as a person in power you must enact further inquiry into how we can support and foster a strong Tule elk presence in the face of the man made disasters we so frequently put upon this land. You should be calling for water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.

Overall, I oppose the General Management Plan Amendment and its support for continued ranching on our National Seashore that endorses the killing of wildlife, pollution of watersheds, irreparable damage to rare fragile native habitats and worsens climate change. **The National Park Service must follow its mandate to manage Point Reyes National Seashore in a manner which provides maximum protection, restoration, and preservation of native wildlife and the natural environment.**

Thank you for your service to our communities. I know this is a complex issue and you are balancing many factors, but these animals need our protection.

Best!

Erica Milsom

**From:** Patricia Huey <pat.huey@sbcglobal.net>  
**Sent:** Monday, September 28, 2020 3:09 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** NPS Plan for Point Reyes National Seashore

Dear Director Ainsworth:

I am appalled that the National Park Service is planning to go ahead with its plan to allow ranchers to expand ranching and to kill Tule elk in the once pristine Point Reyes National Seashore. This is such a bad idea for so many reasons. Please do what you can to stop this disastrous plan.

We are in the midst of some of the worst wildfires in California's history. Scientists the world over have confirmed that animal agriculture is the leading cause of climate change. If you visit Point Reyes National Seashore, the difference between the cattle grazing lands and the lands where the Tule elk and other wildlife live cannot be more striking. You can easily see that the scorched and barren lands where the cattle graze are yet another wildfire in the making. Why would anyone allow this to happen? Yet the lands where the Tule elk and other wildlife live are far healthier, in spite of the lack of water that has recently caused the deaths of some 15 Tule elk.

In 1962, each ranching family was paid \$57 million (the equivalent of \$340 million today) and given very generous benefits such as not having to pay property taxes, paying very low rent for their homes in the park, and having our Federal tax dollars pay for the maintenance of their ranches. These ranching families now own other ranches outside the park. This is a disgraceful waste of our tax dollars. These ranchers were supposed to have left in the 1980s, yet they remain. The original agreement, which the ranching families signed, clearly stated that they were to leave in 25 years so that the park could fulfill its purpose: to be 100 percent dedicated to wildlife.

Do you know that only 4 percent of animals on this planet are wildlife and that the remaining 96 percent are either humans or farmed animals? We MUST do what we can to preserve wildlife habitats, as Point Reyes National Seashore was intended to be. Animals in the wild are vital for the health of our delicate ecosystems. When wildlife goes, we will go, too. We do not have time to waste. It will be so easy to restore these lands, too. A few years ago, Pacheco State Park removed its cattle and within a year the land's health was restored, all thanks to the work of the wildlife living in that park. Human intervention was not done nor was it necessary.

Dairy is a dying industry. It survives only because it is propped up by OUR Federal tax dollars. We don't need this industry because there are so many delicious non-dairy alternatives. Miyoko Schinner, founder of Miyoko's Creamery in Petaluma, has been working with ranchers to help them convert their industries to sustainable businesses that do not harm the planet. Her employees are far better paid than the average Point Reyes ranch hand (who only gets about \$13 an hour), get a 401(k) plan, get reimbursed for education, have full health care coverage, and are even fed meals on the company premises. Her company is growing, too. And all without getting government subsidies

like the failing ranches get. Furthermore, the park generates far more revenue from tourism than it does from the ranches. Isn't that a much better solution to the employment crisis that we are undergoing now? Common sense will promote better employment opportunities and tourism, not ranching. Don't you care about the economic health of Marin county?

I visited Point Reyes yesterday and was struck by the numerous signs begging people to conserve water. How ironic, given that each cow in Point Reyes consumes a full 35 gallons of water every day! Tule elk drink far less water and unlike cows, do not cause the erosion problems that plague the cattle grazing lands of Point Reyes.

Please urge further inquiry into this plan, such as performing water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.

Thank you,  
Patricia Huey  
San Francisco, CA

**From:** Hazel Huey <hp88huey@gmail.com>  
**Sent:** Monday, September 28, 2020 3:06 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes National Seashore

Dear Mr. Ainsworth,

I am very concerned about the lack of support National Park Service Regional Director Woody Smeck has shown for the Tule elk and all the wildlife and native plants in Point Reyes National Seashore. To expand ranching and to shoot the Tule Elk, as recommended in Plan B of the Environmental Impact Statement would be disastrous for the wildlife, native plants and for the park itself. I urge you to do what you can to stop this before time runs out.

The public is against this decision and the only ones who benefit are the cattle ranchers, who continue to destroy this magnificent land. Not only the animals and the land will lose but people who visit the park every year, who support the park, will lose. Once the ranchers take over it will be gone forever. They do not belong in Point Reyes National Seashore.

You certainly understand what will be lost. The habitat for The Tule elk cannot be restricted. It will cause inbreeding and they will die out. Point Reyes National Seashore is one of the most biologically diverse areas in the state. Birds use this area as a resting place when they migrate south.

Ranching has no place in a national park that our taxes support. In 1962, the ranchers were paid \$57 million, not to mention being given generous benefits such as not paying property taxes, paying low rent, and having our Federal tax dollars pay for the maintenance of their ranches. Now they now want to expand. This is a waste of our tax money. The agreement was to lease their lands until it was time to move on, and they have long since overstayed. These are not poor people. They have other ranches outside the park and will not be destitute if they leave.

Their ranches contribute so much to the pollution that periodically the beaches have to be closed off. According to a 2001 biological assessment prepared by the National Park Service, they have contributed to water pollution, death of wildlife and the destruction of native plants. And that means less revenue for the park since no one wants to swim with feces.

Thank you for your attention and support of our cause.

Best wishes,  
Hazel Huey

From: Anjee Lang <anjeelang@gmail.com>  
Sent: Monday, September 28, 2020 2:19 PM  
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
Subject: Point Reyes National Park - Save the Tule Elk

Hello,

I respectfully request you override the NPS in regards to saving the Tule Elk in Point Reyes National Park.

The Tule Elk are native to California, and were once on the brink of extinction. Thankfully they have come back but population are still a fraction of what they once were.

Just as importantly, the ranchers using those lands have other properties for their cattle, AND were paid millions of dollars many years ago to vacate so the Park / Seashore could return to it's natural state.

Also, Tule Elk are suffering because of being restricted (fenced) to make room for the cattle. the plan is now to kill some to ensure resources for the cattle, who don't even belong there.

Thank you for your consideration.

Jaclyn A. Lang  
San Rafael, CA  
Marin County  
(415) 302-5040

From: Margie Forman <1021mf@gmail.com>  
Sent: Monday, September 28, 2020 1:09 PM  
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
Subject: Pt. Reyes

Hi - below is the Mission Statement by the National Park Service.

"Our Mission

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world."

---

Extending leases to dairy farmers at Pt. Reyes National park - farms that have the worst quality water runoff because of the cows, and killing the elk to keep the population down, I do not understand how that falls within this mission statement. The farmers have had many, many, many years to plan ahead so when their leases ran out they would have an option and plan in place.

Please stop the unnecessary killing of the Elk, who belong there. Give the ranchers, say a year, to plan ahead and relocate.

Putting money making enterprises (and small ranches) On national park land, putting ahead of saving the elk, who were almost extinct, is beyond logic. One can't help but wonder how the park service is benefiting by choosing to let the ranchers stay and pollute the land. Again, it's beyond logic.

Marjorie Forman



**From:** Dale <geodale1@earthlink.net>  
**Sent:** Monday, September 28, 2020 12:59 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Final ESI report re: Pt Reyes National Seashore

Dear Mr. Ainsworth,

I am a CA resident living close to Pt Reyes National Seashore Park. Yesterday I joined over 500 others to protest the EIS report issued by the National Park Service (NPS). The report went against the over 7000 citizens who responded during the comment period earlier this year. Over 90% of the responses were in opposition to culling of the free roaming Tule elk and wanted a gradual phasing out of the dairy ranches.

The NPS is favoring culling of the elk when they exceed a certain number and allowing for the expansion of commercial venture that might be undertaken by the ranches and dairies. For example sheep, chickens and row crops. There is talk of possible farm stays and B & Bs. And the ranches will be granted 20 years leases! You probably know already that this expansion was not allowed in the original agreement signed in 1962 when the National Park was created. The Tule elk were reintroduced in 1978 as they had previously been hunted to extinction in this area.

I write to ask that you review the EIS and conduct your own investigation of the damage being caused by overgrazing and other practices. The dairies in particular liquefy the cow excrement and then spray it on the land. The affluent from this practice flows into the creeks and streams and eventually makes its way to the ocean. Please look at the website [FORelk.org](http://FORelk.org), and contact Laura Cunningham, CA Director Western Watershed Project, 775/513-1280.

Thank you in advance for considering this matter which has far reaching implication for keeping wilderness land free from development and allowing threatened and endangered species to survive.

Sincerely,

Dale Sorensen  
Inverness CA

**From:** Seema Vaid <seemavaid30@gmail.com>  
**Sent:** Monday, September 28, 2020 12:50 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Pt Reyes Tule Elk

Hello John,

My name is Seema Vaid and I have been a long time bay area resident.

I am shocked to learn that the wild tule elk in Pt Reyes National park will be shot as part of park management!

These elk have been brought back from the brink of extinction! Also they were dying of thirst since water in the area is being diverted to cattle ranches in the area.

This is morally wrong ... we need to preserve the elk and their habitat.

Please do not allow the elk to be killed. The ranches should be moved to another place and tule elk should be allowed to graze and remain wild in their habitat.

Thanks  
Seema Vaid

**From:** Lonna Richmond <lonnajeane@gmail.com>  
**Sent:** Monday, September 28, 2020 12:41 PM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** PRNS - tule elk

Dear Mr. Ainsworth,

By now you may have heard about the NPS's general management plan which has recently come out.

As a person who loves the great outdoors, a local marinite, and an animal lover, I oppose expanded ranching and shooting Tule elk at Point Reyes National Seashore, recommended in Plan B of the Environmental Impact Statement.

Can you stop this travesty?

The truth is that the NPS, in its 2013 Coastal Watershed Assessment for the national seashore, noted that among the principal threats to water quality on Point Reyes was bacterial and nutrient pollution from ranches and dairies. The Drakes Bay, Limantour, Kehoe, and Abbotts Lagoon areas were particularly polluted. "Extremely high fecal coliform concentrations have been documented in streams adjacent to existing dairy operations," according to the assessment. Areas where dairies spread manure "are correlated with the increased presence of invasive and noxious weed species."

Please do a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan. This is necessary to do in the next 30 days, all the while the native Tule elk are dying from lack of water. One of our local photographers has been hiking the area and has found 15 dead elk. We cannot have another episode like the last one (in 2015), where half the herd died from drought and drought-related incidents. The park service wants to kill the elk with guns, so I fear that rather than having to shoot them they are just leaving them fenced in with their water sources all dried up. This is heartless and cruel and I might add, inhumane.

Please, Mr. Ainsworth, this is time sensitive and my hope is that the Coastal Commission can step in and help protect our unique gem of a National Park from being turned into a dust bowl.

Sincerely,

Lonna Richmond

From: Dennis Fleming <denriverman@aol.com>  
Sent: Monday, September 28, 2020 12:02 PM  
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
Subject: Pt Reyes Elk

I am opposed to expanding ranching at Pt Reyes NP and the killing of our elk. The cows in the park are over grazing the land and putting tons of manure into our streams and ocean. Please put a stop to this expansion and a environmental impact report would be helpful before this Plan in put into effect. Dennis Fleming, Woodacre, CALIFORNIA

**From:** Derick Carss <derickcarss@gmail.com>  
**Sent:** Monday, September 28, 2020 11:01 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes National Seashore

Hi,

My name is Frederick Carss and I live in Marin County, CA. I am calling you to ask you to step in to help protect our coastline and save the Tule elk in Point Reyes National Seashore.

As I'm sure you're aware, Point Reyes has released their final management plan and it's up for a 30-day waiting period so there is urgency to this request. The plan expands industry in the park and kills wildlife. It ignores the park's own Environmental Impact Statement which showcased the detrimental impact ranches have on the ecosystem. It ignores the overwhelming number of public comments favoring a phase-out of ranching and a restoration of the ecosystem.

The National Park Service is being negligent in their management of the elk and the land. The largest herd of these rare elk are trapped behind an 8-foot fence. They have inadequate food and water and the Park Service will not provide water.

Please tell the park to NOT SIGN their final plan. Please tell the park to choose wildlife, healthy ecosystems and to be a leader in the fight to protect biodiversity.

Thank you,  
Frederick Carss

**From:** Gayle Cerri <gcerri847@gmail.com>  
**Sent:** Monday, September 28, 2020 10:52 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Pt. Reyes National Seashore General Plan - Request Further Inquiry

Dear Mr. Ainsworth:

I oppose expanding ranching and shooting Tule elk at Point Reyes National Seashore, as recommended by the National Park Service in Plan B of their General Management Plan. I urge you to take action by requesting further inquiry into the impact of the plan on water and soil quality, air pollution, drought and wildfires before the National Park Service Regional Director, Woody Smeck signs the plan next month.

One-third of the Point Reyes National Seashore- some 18,000 acres- are dedicated to the exclusive use of two dozen ranchers. Cattle manure is sprayed on parkland and runs off into creeks. And because of this Kehoe Creek is one of the most polluted creeks in California. It is in the National Park and it flows into the Pacific Ocean, impacting both freshwater and marine species.

For this reason, and many more, I urge you to contact Woody Smeck and put a hold on this disastrous plan.

Sincerely,  
Gayle Cerri  
39 Partridge Dr.  
Novato, CA 94945  
[Gcerri847@gmail.com](mailto:gcerri847@gmail.com)  
415-246-2873

**From:** laura haworth <haworthlaura@yahoo.com>  
**Sent:** Monday, September 28, 2020 10:15 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Point Reyes elk

*Hello, I'm a californian and an avid hiker. I oppose expanded ranching and shooting Tule elk at Point Reyes National Seashore, recommended in Plan B of the Environmental Impact Statement. Can you stop this travesty? Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.*

*I can't believe the news I'm hearing about elk with no water, and dying elk. it's a national seashore.*

*laura Haworth*

**From:** Toni Hanna <toni.hanna@compass.com>  
**Sent on:** Monday, September 28, 2020 2:31:16 AM  
**To:** careyfeirabend@nps.gov  
**CC:** David\_Vela@nps.gov; Woody\_Smeck@nps.gov; Dave\_Press@nps.gov; Larry; Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>; Norman La Force <laforcelaw@comcast.net>; David Helvarg <helvarg@bluefront.org>; Elizabeth Dougherty <eliz@whollyh2o.org>; Kenji Yamamoto <kenji@kelly-yamamoto.com>  
**Subject:** Pt. Reyes National Seashore - Objections to Alternative B for the General Management Plan Amendment

Dear Carey Feirabend,

I live an hour from the Pt. Reyes National Seashore and it is a national treasure. The tule elk population is a conservation success story. Activists fought for many decades of the 20th Century in order that Pt. Reyes could be preserved as one of our few remaining natural habitats in perpetuity. These activists of the last Century made common cause with local politicians, both Republican and Democrat, because they all recognized the importance of this land and the fact that it should be preserved as a national park.

I strongly object to the Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore. I oppose the killing of native wildlife and the designation of commercial agriculture as the park's main use. Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit.

The native tule elk are an iconic part of the natural landscape of Point Reyes and are the only tule elk herds within the National Park system. There is no ecological justification or valid management reason for harassing, fencing, or shooting elk in the park. Commercial lease holders on our public lands in the park should not be dictating management policies that persecute the park's wildlife.

Alternative B does not manage commercial ranching leases to accommodate elk and other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil, and native vegetation. It sets a horrible precedent in expanding private agricultural uses on our parklands, allowing



row crops and introducing sheep, goats, pigs, and chickens, which will inevitably create additional conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B, and instead approve Alternative F, which would phase out dairy and beef cattle ranching, expand visitor recreation opportunities, and allow the elk to roam unmolested throughout the national park. Alternative F is the only option that prioritizes protecting the outstanding natural values of Point Reyes National Seashore for the public benefit.

I am a taxpayer and I vote. The NPS should not be in the business of making a profit from cattle ranching on federal land using our tax dollars. Aside from an inappropriate use of this treasured land, cattle ranching contributes to global warming. If the NPS continues to turn a deaf ear to overwhelming support of keeping this federal parkland as it was intended, as a natural habitat, then my hope and determination is that through a combination of litigation and a new administration in 2021, this disastrous plan will be overturned.

Sincerely,

Toni Hanna  
Richmond, CA 94804  
(510) 366-4415

**From:** Dave Osborn <daveoz50@yahoo.com>  
**Sent:** Sunday, September 27, 2020 3:19 PM  
**To:** Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>  
**Subject:** Alternative Chose by Park Service for Point Reyes National Seashore

Dear Ms. Huckelbridge,

I am writing to you requesting that the Coastal Commision become involved with the recent declaration of the National Park Service to approve the ranching alternative in the Point Reyes National Seashore. A travesty of our democratic system has occurred in that of the 7000 comments submitted to the Park Service regarding choice of alternative, 91% were in favor of having the ranches closed and returning the Point Reyes Peninsula to wilderness, thus allowing the Elk to roam freely and for wildlife and fauna to return.

Please look into this issue. The ranche's leases were up years ago but the Park Service has continually allowed them to be renewed against overwhelming public disapproval. The ranches cause massive environmental degradation. The chosen alternative only states that there will be funding made available for methane digesters with now other environmental safeguards. Which we, the people who do not want the ranches on public land, will end up paying for!

With the clock ticking for our earth to recover from the massive destruction animal agriculture is causing, not to mention the effects on our health when eating these products, it is imperative that a stand is made in a Park that represents what is good about out country - preserving natural land and not allowing it to be exploited by private interests.

The public has spoken on what should be done, can you represent us? We need your help.

Respectfully,

Dave Osborn

Resident - Point Reyes, CA



Wendy Dreskin  
10 East Court  
San Anselmo, CA 94960

Mr. John Weber, Analyst  
North Central Coast District  
California Coastal Commission

September 22, 2020

Dear Mr. Weber,

RECEIVED

SEP 29 2020

CALIFORNIA  
COASTAL COMMISSION

I am writing to you as a naturalist who has lived and worked in Marin County for 4 decades, spending much time at Point Reyes National Seashore and teaching for the Point Reyes Field Institute and College of Marin. I am concerned that Point Reyes National Seashore has not thoroughly studied the ranching industry's impact on the endangered Snowy Plovers and all ground nesting species of the coastal zone.

Over the time I have lived and taught in Marin County there has been a marked increase in the number of ravens at the coast, and I regularly see them feeding where cows are fed outdoors and hanging out around barns. With the increased numbers, they have even nested right on the small cliff near the bridge at Abbott's Lagoon, a major breeding spot for Snowy Plover. This is my personal experience, but the problem of ravens has also been extensively studied by Point Blue so it is not merely anecdotal. While I have not personally witnessed a raven eating a snowy plover, this too has been well documented by the NPS and Point Blue. The Snowy Plovers have had a particularly poor nesting season this year, making it especially bad timing to add another impediment to their come-back.

The Seashore plan is allowing planting of 2.5 acres of row crops in addition to silage. A 2015 report done by Point Blue for the Park Service documents how many breeding songbirds are killed, and nests destroyed, by mowing at Point Reyes for cattle ranching. There is not even a mitigation plan for these horrendous losses.

I urge you to take action to protect the wildlife in the coastal areas at Point Reyes National Seashore.

Yours truly,

Wendy Dreskin

**From:** William Mott <wmott@aglandinvest.com>  
**Sent on:** Thursday, August 20, 2020 8:30:18 PM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Re. Pt Reyes National Seashore  
**Attachments:** Letter to CCC Aug 20.doc (59 KB)

Dear John, I posted the attached letter today and I would appreciate your thoughts on the subject. All the best, Bill Mott



## AgInvest International

2079 Paradise Drive, Suite A  
Tiburon, CA 94920  
Telephone: 415-686 0828

E-Mail: [wmott@aglandinvest.com](mailto:wmott@aglandinvest.com) • Web page: <http://www.aglandinvest.com>

Mr. John Weber, Analyst

August 20, 2020

North Central Coast District

California Coastal Commission

Dear Mr. Weber,

I am writing to you as an advocate for State and National Parks, as well as the sensible use of our coastal zone and, specifically, the usage of Point Reyes National Seashore (PORE) for commercial dairy and beef cattle enterprises. During my professional career as an agriculture management consultant I have been an advocate for sustainable food and agriculture production...but not in National Parks. Incidentally, over 40 years ago I provided agricultural consulting services to the CCC for planning and projects in Half Moon Bay.

As you are aware, a decision is pending on a General Management Plan Amendment (GMPA/EIS) at PORE that will determine whether 20-year lease extension will be granted for livestock enterprises within the Seashore. I know the CCC has been provided information on the environmental degradation taking place because of ranching in the Seashore, as well as the threats to native elk and other wildlife posed by livestock grazing.

My concern is that commercial agricultural enterprises have no place in a National Park. Our state has millions of acres of pasture and ranchlands utilized for livestock, but very limited parkland devoted to conservation of the natural environment and offering recreation to all Americans. A national park near a large urban population is even rarer.

## Dairy Economics

The California dairy industry is facing significant economic and environmental problems. While the state of California is the largest dairy producer in the USA, production is leveling off and is likely to decline. Many large dairies, previously profitable, are going out of business in the San Joaquin Valley, in part because there are more profitable uses of land and water. Land and water previously used for dairy operations and forage production are being utilized for more profitable permanent crops such as almonds, pistachio, and wine grapes. Some dairies have moved to Idaho.

Setting aside environmental issues to focus solely on economics, I do not believe the dairy operations in the Seashore can survive economically over the next 20 years. Continuation of the leases is a prescription for failure for farms there that manage to survive only by significant national, state, and local subsidies. For example, livestock operations managed by the Seashore do not have to pay property taxes, and the meager lease payments paid to PORE go to maintaining the fences and ranch facilities. It is basically a free ride for very small group of commercial farm operators and for what purpose? Certainly, it serves no public benefit nor restores or preserves the California coast.

According to United States Department of Agriculture (USDA) in 2016 the average size of a USA dairy is 1,581 cows. In the San Joaquin Valley of California, where most of the state's dairies are located, the minimum economic size is 1,000 cows. Small dairies are not viable for the long term. There will always be a market for very specialized dairies, but they do not need to be in a National Park. In the face of increasing operating costs and lower or static milk prices, dairies are becoming larger to survive. In 2005 USDA indicated the average income per 100 lbs. of milk was \$1.48 in 2016 the same figure was \$0.86.

What has saved many small California dairies over the past 15 years was the increase in demand for organic milk selling at significant premium prices. According to the 2019 Marin Agricultural Crop Report the farm price for organic milk was \$29.00 per CWT vs. \$14.50 per CWT for conventional milk. Unfortunately, the organic milk price is leveling off and is not projected to increase significantly over the next 10 years. In 2016, 80% of the North Bay's 90 dairies had been certified to sell organic milk. By 2018, that number was closer to 90%, resulting in a market awash with organic milk and substantially reducing the margins between revenues and expenses. ([Source: Digitale, 2018, Sonoma County Press Democrat](#))

## Agriculture is Dynamic

It is important to note that farming and crop production is not static, demand for crops and food products is continually changing. The PORE when considering providing 20-year leases, needs to know how the enterprise will operate, examine financial projections and business plans, and establish the criteria for environmentally beneficial operations before committing public land to commercial livestock operations for decades to come (and the lessees believe it will be in perpetuity). Without the data, **the ranching operations are akin to a "hobby farm" for the enjoyment of a very small number of private citizens subsidized by the U.S. Government to the detriment of the public.**

It is commonly known in farming that as profitability decreases, management short cuts such as ignoring environmental protocols, over-grazing, and reduced fence and building maintenance, increase. The net result at PORE is the loss of scenic beauty, environmental degradation, and headaches for Park Service management.

The real economic driver in West Marin is recreation and tourism at PORE. Per PORE's Draft GMPA/EIS, ranch leases generate \$16 million out of \$96 million of Marin County's agricultural revenue while tourism to the Seashore generated an estimated \$107 million in 2018.

I know the CCC is familiar with the many controversial issues surrounding coastal dairy operations, particularly in Northern California. I would be interested in your analysis of the environmental impacts and economics of the coastal dairies. I urge the CCC to consider these impacts in reviewing the plan proposed by the National Park Service as the Preferred Alternative for the privately-run commercial livestock operations ranches at PORE.

The optimum solution is to gradually eliminate livestock operations over the next 10 years...the public and even the ranch operators will be happier in the long run if they move to private lands. Many years ago, there was a reason why John Muir lobbied hard to keep sheep from grazing in Yosemite National Park!

Sincerely yours,

William P. Mott, Partner

CC Acting Superintendent Carey Feierabend, Point Reyes National Seashore



**From:** Robert Johnston <rajohnston@ucdavis.edu>  
**Sent on:** Wednesday, August 19, 2020 1:13:40 AM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** FW: Please Object to the Submittal of the Federal Consistency Determination by NPS for the Adoption of the Pt. Reyes National Seashore Plan and EIS

John,

Pls acknowledge that you got this. I think I had a wrong email address with california, instead of ca. If you prefer this in Word, I can send it in that format, too.

Since I have analyzed the Draft plan amendments and the Draft EIS, I'll have to redo this, when the finals come out, right?

Thanks,  
 Bob

---

**From:** Robert Johnston  
**Sent:** Tuesday, August 18, 2020 6:08 PM  
**To:** john.weber@coastal.california.gov  
**Subject:** Please Object to the Submittal of the Federal Consistency Determination by NPS for the Adoption of the Pt. Reyes National Seashore Plan and EIS

Dear Mr. Weber:

**I urge the Commissioners to object to this submittal, for the reasons given below.**

### Motivation for This Letter

The National Park Service (NPS) at the Pt. Reyes National Seashore (PRNS) will soon submit for your review a Federal Consistency Determination, for an Activity that falls under the CZMA sec. 307(c)(1), and related provisions, and 15 CFR 930.30, and related provisions, requiring an assessment of consistency with the California Coastal Management Program (CCMP). The Activity in this case is the adoption of amendments to the Seashore's General Management Plan (GMP) and adoption of the accompanying FEIS (in a Record of Decision). Taking the California Coastal Act to be the main policy component of the State Coastal

Management Program, the Seashore Plan amendments clearly are not consistent with several policies found in Chapter 3 of the California Coastal Act. I urge the staff to recommend to the Commissioners that it object to this submittal, as I believe is normally done in cases where there are “significant concerns.” (CCC, Fed. Consistency in a Nutshell, rev. 1/2001).

I take consistency here to mean that the “federal activities must be fully consistent with the CCMP unless existing law prohibits compliance.” (CCC, Nutshell, 1/2000). By analyzing the Draft Plan Amendments and DEIS, I will demonstrate that several policies intended for adoption clearly conflict with mandatory provisions in the Coastal Act. I will also show that the data presented in these draft Plan amendments and DEIS are insufficient regarding some impacts to meet the standard that a consistency determination “must include a detailed description of the activity, its associated facilities, and their coastal effects, and comprehensive data and information sufficient to support the Federal Agency’s consistency statement.” 915 CFR 930.39) (CCC, Nutshell, 1/2000). As with NEPA, the CZMA here places the burden on the agencies to make it clear to the public how their findings are based on data and logic.

### My Qualifications

Since this is a significant issue with major effects on the coastal environment at Pt. Reyes, I will outline my background. I taught environmental planning at UC Davis from 1971 to 2005. In the 70s, I published several articles on impact assessment methods and was the director of an undergrad major in parks management. In the 80s, my research involved methods issues specific to growth-inducing impacts, long-range impacts, and large-scale effects and I helped to develop GIS-based tools for use in regional planning. In the 90s, I was an expert in three Federal lawsuits on NEPA issues, commenting on new freeway segments and interchanges as they would affect travel and urban growth. I was a member of a National Academy of Sciences panel on transport modeling 2005-07. I have advised the Governor several times on both standing and ad hoc panels, several State agencies, and many local planning departments on growth issues. I have been a planning commissioner in two California cities and am now on the board of a California conservancy. I am familiar with the California coastal planning process and actually had Peter Douglas lecture in my land use law class in the 70s. I have reviewed the LCP for Marin County in detail, read the PRNS



GMP, and the current subject documents (the GMP amendments and related DEIS, with many supporting documents).

### The Proposed Federal Activity

The draft GMP amendments propose to allow the intensification of land uses on 17,000 acres in the Seashore and on 10,000 acres in the Northern section of the Golden Gate National Recreation Area (in the Olema Valley), managed by the PRNS. These 26 ranches are currently under agricultural leases for beef cattle grazing and for dairy farm grazing.

The NPS preferred alternative (B) will:

1. Increase the acres devoted to ranching in the parks by 12,800 acres.
2. Allow a new commercial land use, Small Retail, for stores and stands for agricultural products.
3. Allow a new industrial land use, Ag Processing, for small cheese factories.
4. Hostels, tent cabins, farm stay rooms, and various camping accommodations.
5. Housing and offices for volunteer organizations.
6. Other adaptive reuses of ranch buildings.
7. Horse boarding.
8. Row crops (2.5 acres per ranch).
9. Small livestock (40-70 sheep, goats, or pigs per ranch) and up to 500 chickens. The existing number of cattle will be allowed (5,500 head).

10. Elk will be shot, so as to be “compatible with authorized ranching operations.”

### Impacts of the Proposed Alternative

I have commented to the NPS about the fatal flaws in the DEIS: Lack of adequate description of the laws that affect the NPS, which require “no impairment” of natural resources; inadequate data on water quality, one of the worst impacts of cattle grazing; inadequate discussion of the impacts on surface waters needed by listed fish species; inadequate identification of mitigation measures overall and of specific ones to place in ranch operating agreements to improve soil quality and reduce erosion potential; and interference with tourist access to all parklands.

Besides these normal topic issues of inadequate impact assessment, the DEIS suffers from biased methods. For example, the NPS used improper baselines in many cases, against which to assess impacts. In general, they compared future

impacts against a baseline of the current state of the ranchlands. They should have used the natural environment, with cattle removed, as the baseline. In addition, they put off to the future the identification of mitigation measures, even for acknowledged major adverse impacts, such as range condition/soil erosion/water quality, where they state that they will do a “programmatic review of best management practices” in the future in carrying out the plan. This is not legal in a very clear line of cases and most agencies do not try to do this anymore.

### Examples of Specific Conflicts with the Coastal Act

I only have the time and expertise to give a few examples here, enough to show that this Activity is not consistent with the Coastal Act.

#### Article 5, Land Resources

Sec. 30240(a). “Environmentally sensitive habitat areas shall be protected...”

The past Biological Opinions from the F&WS and Calif. F&G (now F&W) on the PRNS “livestock grazing program” both stated that the lease program was not likely to jeopardize the salmon and steelhead species nor damage the coho’s critical habitat, if the NPS complied with the reasonable and prudent measures described. These include monitoring fecal coliform and sediment and if they go above specified standards and it is determined that the pollutants are coming from grazing lands, the NPS must ameliorate the problems. Sedimentation of creek pools and rising, water temperatures are subjected to the same rules. This opinion applies the Lagunitas Creek watershed, the tributaries of Drakes Estero, and a few other small coastal streams. It appears that the NPS has not followed all of these recommendations. Water quality in some creeks in the planning area continue at past levels. The F&WS and Cal F&W will issue biological opinions again on the GMP amendments and FEIS and their recommended policies must be adopted into the ROD by the NPS to be effective.

Sec. 30240. “Environmentally sensitive habitat areas shall be protected...”

The existing ranches in the PRNS cause very poor range quality/bare soils leading to widespread soil erosion, sedimentation, and manure pollution of nearby creeks. The PRNS’ own ranch lands report shows continuing lack of enforcement of their grazing rules, with too many cattle in many areas, year after year. A simple drive through the ranch areas on paved roads clearly shows hardened soil surfaces, gully erosion, creek eutrophication, and surface water pollution. Kehoe

Creek, which runs through the Kehoe Ranch to the sea, is one of the most-polluted waterways in California. Children can be seen playing in its outlet, a small pond in the sand at Kehoe Beach.

Sec. 30243. “The long-term productivity of soils... shall be protected...”  
Many of the dairies are so overgrazed near to the barns and feeding areas that the soils are dead and barren from trampling. The overloading with N. from sprayed manure water kills most organisms. Compared to the original coastal grasslands, these lands are clearly severely degraded.

#### Article 6, Development

Sec. 30250(a). “New residential, commercial, or industrial development... shall be located within, contiguous with, or in close proximity to, existing developed areas...”

The proposed project will intensify land uses considerably on many of the ranches, by allowing the development of row crops and livestock pastures and pens, ag retail sales, cheese processing plants, and various tourist accommodations. These tourist attractions will bring people out to these two parks who are not coming to see coastal areas. Because these new activities will be far from the sparse existing tourist facilities in this area, trip lengths will be longer than if they were located, say, next to Pt. Reyes Station or Tomales, existing activity areas. California has been a leader in reducing automobile travel to reduce greenhouse gases. More specifically, we passed a law in 2013, SB 743, that mandates that all local and regional agencies reduce automobile travel by evaluating the impact of development projects on vehicle-miles of travel (VMT) in order to reduce greenhouse gases. These laws show the importance of compact development to California’s world-leading efforts to reduce climate change. The NPS plan amendments should not increase sprawl in the parks and the EIS should have evaluated this impact.

#### Examples of Inadequate Data

In the cases of impacts on listed fish species and of impacts on surface water quality, there are not enough data in the DEIS for the reader to understand the issues and to independently determine what the impacts are likely to be. Many of the 7,600 comments on the DEIS concern themselves with the lack of data in the document regarding many types of impacts.

### Conclusions

The proposed GMP amendments and the DEIS done on them both clearly show that this federal activity is not consistent with the California Coastal Act. I urge the staff to recommend to the Commissioners that they object to this submittal.

Thank you for your consideration of this request.

Robert A. Johnston  
415 663-8305 landline  
530 559-0032 cell/text  
P.O. Box 579, Point Reyes  
Station, CA 94956

**From:** james.coda@comcast.net <james.coda@comcast.net>  
**Sent:** Thursday, August 13, 2020 1:46 PM  
**To:** Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>  
**Subject:** A Disturbing Day at Point Reyes National Seashore

Hi Larry,

I sent a letter to Point Reyes Seashore today about some things I found disturbing on a recent visit. It's relevant to any CD the Seashore will be submitting to you, so I'm attaching it to this email.

The SFRWQCB never responded to my June 10, 2020, letter. I believe I sent a copy of that letter to you shortly thereafter.

Best regards,

Jim Coda  
415 602--6967  
<https://jimcoda.com>

**MEMORANDUM**

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Date: August 11, 2020  
From: Mary Anne Flett, Wildlife Biologist, Point Reyes Station, CA  
To: Mr. John Weber, Analyst  
California Coastal Commission  
North Central Coast District  
455 Market Street Suite 300  
San Francisco, CA 94105  
Subject: Comments about deficiencies in the General  
Management Plan Amendment Draft EIR for Point Reyes National  
Seashore and Golden Gate National Recreation Area

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Dear Mr. Weber,

I have worked as a professional wildlife biologist for more than four decades. I live in Point Reyes Station and have been working on bird aspects of the Giacomini Wetlands and Abbott's Dunes Restoration projects, leading bird trips, and enjoying recreational activities in Point Reyes National Seashore and Golden Gate National Recreation Area since the 1970s. For many years, I conducted research on Willow Flycatchers, a state-endangered migratory bird species that breeds in meadows in the Sierra Nevada. Major factors that have contributed to their decline include livestock grazing and human impacts on the meadows where the birds breed. Because I have witnessed the effects of livestock grazing and overuse by humans first-hand, I am concerned that the alternatives presented in the General Management Plan Amendment Draft Environmental Impact Report (GMPA), will result in continued degradation of the parks by livestock and humans. I'm very concerned that the park's preferred management choice, Alternative B, will be adopted as the final General Management Plan Amendment.

The National Park's mission statement is "to conserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations" (Organic Act of 1916).

The impacts of ranching in Point Reyes and the Golden Gate Recreation Area are numerous and have been addressed elsewhere by others. Keeping the National Park's mission in mind, I will focus here on wildlife and ranching practices in Point Reyes National Seashore and comment on the impacts of visitor use, particularly if ranching is removed and more areas are opened up to tourism in the parks.

**WILDLIFE AND RANCHING**

The park, funded by taxpayer dollars, has expended huge amounts of effort and money towards re-establishing the native Tule Elk herds in Point Reyes National Seashore. According to the park's own records, there are 730 Tule Elk and a total of 5530 cattle (2,400 AU of beef cattle and 3,130 dairy animals) in the park. The carrying capacity based on available forage is currently supporting more cattle than Tule Elk. Tule Elk numbers may eventually have to be managed due to lack of natural predators in the park's ecosystem if grazing is removed. But Tule Elk, as grazers, could likely serve the same or better function as beef cattle if cattle were removed from the park. Tule Elk would reduce cover to benefit native plant communities and rare plant species, limit vegetation that could fuel a wildfire, and maintain grassland habitats for native wildlife. Tourists appreciate the park's wildlife and often stop to watch elk, coyotes, and occasionally, bobcats, gray foxes, or badgers - I doubt that most people who come to Point Reyes visit because of a desire to experience the everyday function of a modern-day cattle ranch. There is nothing unique about beef cattle ranching as a historic or cultural resource in the park; it (and the degradation it causes) can be observed all over the American West. Preserving Tule Elk populations is consistent with the park's stated mission.

Cattle impact the land by compacting soil, changing hydrology and the ability of soil to hold water, degrading riparian and wetlands habitats, eroding drainages and stream banks, grazing grasses and shrubs that provide nest sites and cover for wildlife. They trample the nests and eggs of ground-nesting birds such as Plovers, Quail, and Snipe. Their manure runs into water bodies and degrades water quality. There are many secondary impacts from ranching as well, such as ATVs disturbing wildlife and wearing trails across the landscape, fuel and oil leakages (B Ranch diesel fuel storage tank), fences that restrict wildlife movement, introduction of invasive plant seeds in imported hay, and livestock uncontrollably spreading invasive plant seeds in their manure. Some of these issues are complicated and in specific circumstances, livestock grazing can actually benefit certain species. For example, grazed landscapes may allow frogs, snakes, and other small animals to move more easily between ponds and upland refugia; grazing reduces non-native, invasive annual grasses, thereby reducing competition and allowing native wildflowers and rare plants to grow. Even so, the overall effects of livestock grazing as it is currently managed are detrimental to the ecological health of the park.

None of the alternatives presented in the GMPA address remediation or restoration for damage by livestock and associated ranching practices. A specific plan should be made and implemented to restore trampled and compacted wetlands. It should include how these habitats will be re-planted and monitored and success should be guaranteed over time. High water quality should be reinstated and maintained throughout the park with performance standards and long-term monitoring included in the plans. The GMPA should address how such efforts could be funded, when they can begin, to what standards they need to perform, and who will be responsible for implementing the restoration.

Current ranching practices in the park already violate permitted uses, for example, some ranches stock more animals than are permitted (G Ranch), there's little or no effort to exclude

cattle from riparian areas, and cattle routinely escape and remain in areas where they aren't allowed (G Ranch cattle at Abbott's Lagoon). Under no circumstances should ranching be allowed to expand at the expense of natural resources, particularly when some of the ranches do not comply with standards that are already required in their leases.



***Beef cattle at D Ranch on September 22, 2019.***

***(Note overgrazed and denuded landscape in this location)***

The park's preferred Alternative B, if adopted as the final General Management Plan Amendment, would allow expanded livestock production (pigs, sheep, goats). Small livestock attracts predators such as coyotes, bobcats, and mountain lions. Would ranchers demand that the park control these predators in order to protect their livestock (at the taxpayers' expense) or would they "control" predators themselves?

A recent study (Pennisi 2019) found that bird numbers have declined precipitously; 2.9 billion birds, or 25% of the population of birds on our continent, have been lost since 1970. Grassland bird species have declined by 720 million, a 50% population loss. Point Reyes National Seashore has historically sustained extraordinarily high bird diversity and richness; this area is a national and international destination for birders and naturalists. Surely this, even without any other considerations, should motivate the park to prioritize protection of this avian "hotspot". Given the sobering declines in bird populations, every measure to protect birds should be implemented in the park by careful improvement of wildlife habitat and preservation of



wildlife. Protecting bird life on its own merit and for enjoyment by the public should be an imperative priority, requiring mitigation of impacts from ranching as well as protection from unchecked visitor usage. It is central to the park's mission to protect wildlife for the enjoyment of this and future generations.

More livestock in the park will require more feed and Alternative B would allow ranchers to grow and produce more silage. Silage production involves planting hay that is harvested, fermented, and stored to feed to livestock during the dry season (and drought years). When the silage crop is growing, animals move in and birds nest in the planted fields. Then, when the crop is harvested during nesting season, animals are impacted and bird nests, eggs, and young are destroyed. Habitat that attracts wildlife and then gets decimated is called an "ecological trap" (Schlaepfer et al 2002); the practice of growing and harvesting silage in Point Reyes National Seashore is a perfect example of an ecological trap.

In May 2014 I directly observed the destruction of a nesting population of Grasshopper Sparrows (*Ammodramus savannarum*) along the trail to Abbott's Lagoon during hay mowing. Grasshopper Sparrows are a declining species, listed as a California Species of Special Concern (Shuford and Gardali 2008). Other ground-nesting bird species, such as California Quail (*Callipepla californica*) and Savannah Sparrows (*Passerculus sandwichensis*) were certainly also impacted at the time. The mown field is adjacent to a pond that supports California Red-legged Frogs (*Rana draytonii*) (listed as Threatened in California) that move between the pond and their upland refugia (in gopher burrows) in the field. American Badgers (*Taxidea taxus*) (listed as a Species of Special Concern in California) inhabit burrows in and adjacent to the field that was mown. Burrows inhabited by these and other ground-dwelling species are collapsed by the weight of heavy equipment driving over them. The day that I watched mowing by the Abbott's Lagoon trail, a large flock of Corvids arrived and followed the mowing equipment. American Crows (*Corvus brachyrhynchos*) and Common Ravens (*C. corax*) were attracted by the disturbance to scavenge on frogs, snakes, rodents, insects, and other wildlife species that were exposed or killed during mowing. Corvids are known to depredate bird nests; attracting them to the area secondarily increased the risk to other species including Western Snowy Plovers (*Charadrius alexandrinus nivosus*) (Federally-listed as Threatened, California listed as a Species of Special Concern) which nest nearby in the Abbott's dunes and at Kehoe Beach. The day that I watched the mowing, I wrote to the park about what I'd observed and yet the practice of growing silage has not only been allowed to continue, it would be allowed to expand if Alternative B is implemented. Mowing and other ranching activities that adversely affect birds during nesting season is a violation of California State and Federal laws that protect migratory birds. The park must uphold these laws and require ranchers to abide by them.



***Mowing at Abbott's Lagoon, May 2014. Note Corvids circling overhead.***

Common Ravens are thriving in the park. While they are a natural part of a balanced native ecosystem, their inflated numbers and range within the park are directly attributable to human and ranching activity. Ravens are opportunists that consume birds, bird eggs, small mammals, reptiles and amphibians, plant seeds including seeds in manure, and they are directly subsidized by ranching via hay and grain fed to livestock. Concentrations of 75-100 Ravens were noted in Aug 2019 at I-Ranch pastures (M.A. Flett, pers. obs.). To protect rare species, California State Parks (including Big Basin, Butano, Patrick's Point, Prairie Creek), provide strict guidance measures to visitors in order to prevent expansion of Corvids into their parks. According to the GMPA, the park requires ranchers to limit Raven access to supplemental feed and shelter by installing covered feed bins, cleaning up waste grain around troughs, removing and placing troughs in enclosed structures, and storing harvested crops in enclosed structures - but these measures either haven't been implemented or they aren't working.

Common Ravens encroaching from ranches into Snowy Plover habitat is at odds with efforts to protect and increase numbers of this legally protected species. Among several recommendations in the Snowy Plover Management Plan (Hornaday et al. 2007) is: "Manage breeding and wintering habitat of the Pacific coast population of the western snowy plover to ameliorate or eliminate threats and maximize survival and productivity." Since 1986, The park has invested thousands of dollars of public funds (approximately \$65,000/year over the last 3-4 years) towards this effort, and yet the Raven population is still uncontrolled.

Tricolored Blackbirds (*Agelaius tricolor*), a nearly endemic species in California, are state-listed as Threatened and are rapidly declining. Small numbers of these birds formerly bred in western Marin County annually during the late nesting season (July–September)(Stallcup 2004). There has been no documented breeding in Marin County since then (CDFW 2018). Wintering flocks formerly numbering more than 10,000 birds assembled near dairies on the Point Reyes Peninsula, Marin County, by mid-October in the 1980s, but these numbers have been reduced to 3,000 or less in recent years (eBird Dataset 2016). Flocks of Tricolored Blackbirds still gather during the fall and winter on the dairy ranches at the outer peninsula of Point Reyes, where they feed on insects, undigested seed, and grain associated with cow manure in the loafing areas. This is an upside of dairy ranching, even though it is and riparian vegetation for cover and nesting, enhancing habitat for diverse insect and plant populations where the birds can forage, and providing reasonable protection from the impacts of humans and cattle on the land might allow the nesting population to be naturally re-established. If long-term ranching leases are part of the final General Management Plan Amendment, the way ranches are currently managed must be radically improved to benefit wildlife and the natural environment and the park must enforce management practices that benefit the ecosystem.



***Dairy Cows and Tricolored Blackbird Flock at B Ranch, September 22, 2019***

Feral and outdoor domestic cats frequent the ranches and hunt birds and other wildlife in the park. “A” Ranch provides an outdoor feeding station, which should not be allowed in the park. An American Bird Conservancy report (2006) on the impacts of outdoor cats says that cats are the second most serious threat to bird populations worldwide. They also state that scientists estimate that our nation’s free-roaming cats kill hundreds of millions of birds, small mammals, reptiles, and amphibians each year, including endangered species. The report also says that



free-roaming cats are capable of spreading zoonotic diseases and parasites to other cats, wildlife and people.



*Outdoor cat feeding station at A Ranch, August 2014. The same feeder is still present today.*

### VISITORS AND RECREATION

The GMPA presents options to expand tourist access including bike trails, more horse facilities, kayak-in sites at Drake's Estero, and large-scale trail-based events. Intensive human use disturbs wildlife; bikers on trails displace wildlife, cause gullying and erosion, and startle hikers. Five Brooks Stables provides regular horse rental rides that are eroding the trails nearby, particularly along the south side of the pond and along the Bolema Trail. Manure loads on the trail surrounding the pond are a source of high-nitrogen runoff into the pond and the pond surface is covered with thriving invasive aquatic plants. There are visitors camping where it isn't allowed (at Kehoe and Limantour Beaches), overnight campers and partiers at Tomales Bay boat-in camps with bright lights and loud music, commercial recreational enterprises who reserve and dominate camp spaces on the bay, unauthorized trails through wildlife habitat, and trash and human waste along trails and roadsides. These high-use impacts are evident throughout Point Reyes and GGNRA. Given the parks' proximity to urban areas and greater-than-usual numbers of people visiting the park due to the COVID pandemic, tourism is increasing and causing heavy impacts in the park. Law enforcement and maintenance crews cannot keep up. Opening even more areas to visitor use than exist already creates issues that

the park may not be able to manage effectively due to lack of adequate funding and staffing constraints.

Poor ranching practices and unregulated overuse by humans highly impact the ecological health of the parks. I am advocating here for protecting the park's ecological health and wildlife and aiming for a much higher standard than exists now.

In conclusion, none of the alternatives in the GMPA provides options that focus on preserving the natural environment or wildlife - either now or for future generations. I sincerely hope, for the reasons described here, that none of the alternatives presented in the DEIR is chosen to be the final General Management Plan Amendment for Point Reyes and that new alternatives that provide restoration and protection for the ecosystem will be developed and implemented instead.

Thank you for considering my opinion as a long-time resident of the area and from my perspective as an experienced biologist.

Mary Anne Flett  
USFWS T&E permit #TE233373  
CDFG SCP & MOU #SC7407

## REFERENCES

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**CC:**

Carey Feierabend, Acting Supervisor, Point Reyes National Seashore

[Ryan Olah, Coast Bay Division Chief, U.S. Fish and Wildlife Service](#)

**From:** [rscimino@gmail.com](mailto:rscimino@gmail.com) <[rscimino@gmail.com](mailto:rscimino@gmail.com)>  
**Sent:** Friday, August 7, 2020 3:17 PM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>  
**Cc:** [rscimino@gmail.com](mailto:rscimino@gmail.com) <[rscimino@gmail.com](mailto:rscimino@gmail.com)>  
**Subject:** Citizens letter w/regard to Point Reyes NP Coastal zone use.

Dear John Weber,

Please accept my attached letter with regard the upcoming Point Reyes management plan for California Coastal Commission review.

May I ask that you confirm receipt, by providing your U.S. mailing address so I can also provide you a hard copy via U.S. MAIL.

With Appreciation,

Rich Cimino

[RSCIMINO@GMAIL.COM](mailto:RSCIMINO@GMAIL.COM)

Mr. John Weber, Analyst  
North Central Coast District  
California Coastal Commission

Dear Mr. Weber,

I am writing to you as a conservation advocate for the wise, sensible use of our coastal zone – which is the beach and upland zone, specific to Point Reyes National Park (PRNP). My concern is that the PRNP has not thoroughly studied the ranching industry's impact on the Snowy Plover (an endangered species), Northern Harrier, and three species of sparrows, all nesting species of the coastal zone of Pt. Reyes. The ranching practices damage the habitat of the endangered Snowy Plover and other ground-nesting birds within the coastal zone.

The ranches are creating mega-habitat roosting sites for Ravens by growing and harvesting silage in the upland coastal zone. The abundance of Ravens – possibly the highest coastal populations of anywhere on the west coast—is linked to beef and dairy feed, cattle birthing, and silage mowing which results in killed birds and small mammals during the harvest within the coastal zone planning area.

As an active birder of PRNP, it is obvious to me that the number of Ravens has increased significantly in the last ten years to the detriment of the Snowy Plovers, Northern Harriers and other small animals. Traveling through PRNP on Sir Francis Darke Blvd., it is common to see dozens of Ravens perched on corrals, building roofs and fences of the ranches. Large congregations of Ravens have successfully

established roosting sites on the ranches where there is easy access to garbage, livestock feed and the afterbirth of calving. The Ravens can also be seen in great numbers foraging on the coastal zone sand dunes above the Snowy Plover nesting habitat, waiting for movement to identify a nest site. This artificial Raven population has increased predation upon the nesting snowy plovers and other ground-nesting birds. Reports from Point Blue and the National Park Service (NPS) for 2019, indicate that 46% of PRNP nests were lost to Ravens. Studies have yet to be done on how many ground-nesting birds are lost to the cutting of silage, but common sense would indicate that there is a significant impact on bird populations.

Soon the NPS will release their final management plan for the park. The Environmental Impact Statement does not address the issue of ranch-Raven-Snowy Plover population dynamics. It is my understanding that the California Coastal Commission (CCC) will be reviewing topics in the NPS plan that may be out of synch with CCC best management practices or incomplete, short of a comprehensive determination that the ranches should not be practicing methods that interfere with efforts to recover the Snowy Plover population. Is this the case?

I hope my letter will be regarded as a resource to the CCC staff as you and others plan your approach to the NPS plan regarding Snowy Plover survival. As a regular visitor to the park, I want the CCC to know that the public is concerned about the damage caused by the ranching.

With Appreciation,  
Rich Cimino  
60 Elizabeth Circle  
Larkspur, Ca. 94904



**From:** Chance Cutrano <ccutrano@rri.org>  
**Sent on:** Saturday, July 4, 2020 12:20:38 AM  
**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Resource Renewal Institute letter to CCC re Point Reyes Nat'l Seashore\_July 3, 2020

Good afternoon, Mr. Weber,

Please find a letter from Resource Renewal Institute/Restore Point Reyes Seashore attached to this email along with various supplemental supporting attachments. In addition, I include the letter in its entirety in the body of the email below.

If there is another analyst that may be the appropriate point of contact for this subject please advise.

Please let me know if you have any questions or concerns.

Have a lovely 4th of July weekend,

Chance Cutrano [he/him/his]  
Director of Programs  
Resource Renewal Institute  
187 E Blithedale Ave, Mill Valley, CA 94941  
Office:415.928.3774  
Direct: 415.888.8248  
Cell:312.403.3702  
[ccutrano@rri.org](mailto:ccutrano@rri.org)

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July 3, 2020

Mr. John Weber, Analyst  
North Central Coast District  
California Coastal Commission  
Via email

Dear Mr. Weber,

I am writing on behalf of [Restore Point Reyes Seashore](#), a citizen initiative of education, advocacy and conservation for the Point Reyes National Seashore (PRNS), under the fiscal sponsorship of the Resource Renewal Institute, a 501c3 organization in Mill Valley, California.

The National Park Service's (NPS) General Management Plan Amendment/Environmental Impact Statement (GMPA/EIS) for 18,000 acres of the Point Reyes National Seashore (PRNS) and 10,000 acres of the adjacent Golden Gate National Recreation Area (GGNRA) is expected to be finalized this summer. It is our understanding that the release of the final plan and Environmental Impact Statement will be reviewed by the California Coastal Commission (CCC) for consistency with the California Coastal Act.

Based on the draft GMPA/EIS (GMPA/DEIS) issued last summer, we believe that the NPS's "preferred alternative" under consideration is inconsistent with the Coastal Act. Alternative B portends unavoidable impacts to the coastal zone and marine environment for decades to come, including to water quality, endangered plants and wildlife, public access to and enjoyment of the coastal resources, public health, climate and the local agricultural economy.

For the record, we and others have sent letters about these concerns to the NPS management at the Seashore and the San Francisco Regional Water Quality Control Board (SFRWQCB). It is our understanding that the NPS will copy the CCC on this correspondence prior your Consistency review. If that's not the case, please let me know so that we may provide these documents, as needed.

Point Reyes National Seashore is the only national seashore on the Pacific Coast and is designated part of the Golden Gate Biosphere Reserve by the United Nations. The CCC was a staunch defender of the Seashore's Drakes Estero, a designated federal wilderness that, until 2014, suffered the impacts of a now-closed commercial oyster operation. We also note that the CCC was instrumental in eliminating the devastating environmental impacts of cattle on Santa Rosa Island, part of the Channel Islands National Parks. Many of the threats to these coastal areas continue unabated at the Point Reyes National Seashore.

We welcome the opportunity to discuss these concerns with you, and would encourage staff and commissioners to visit the national seashore to experience firsthand the impacts of ranching on coastal resources. We are available to answer any questions, and to meet with you in person or via phone or video conference call.

Please notify us of any significant steps in your upcoming consistency review process. Additional information on Point Reyes ranching can be found at <https://restoreptreyesseashore.org>

### **General Management Plan Background and Status**

In 2016, the Resource Renewal Institute, Western Watershed Project, and Center for Biological Diversity brought an Administrative Procedures Act complaint against the NPS for the failure to update its 1980 General Management Plan, while it engaged privately with ranchers to develop a special-use, "Ranch Comprehensive Management Plan" for continued ranching on 18,000 acres of the Point Reyes National Seashore and 10,000 acres of the adjacent Golden Gate National Recreation Area.

A settlement agreement reached in 2017 committed the NPS to amend its General Management Plan (GMPA) and, for the first time in the history of the Seashore, required NPS to produce an EIS on the impacts of the ranching. Under the National Environmental Policy Act (NEPA), the public would be

allowed to comment on ranching alternatives, including “Reduced Ranching,” “No Dairying,” and “No Ranching” alternatives.

The NPS received more than 7,600 public comments, which it made public in February 2020. The NPS, elected officials, and agricultural agencies, have long claimed—without evidence—that the public unequivocally supports ranching in these national parks. An [independent analysis](#) of the 7,600 comments found that more than 90 percent of the comments submitted during the GMPA/EIS NEPA planning process opposed the NPS’s preferred alternative (Alternative B) on various grounds.

Alternative B provides for unprecedented 20-year ranch leases; permits diversification of livestock to include sheep, goats, turkeys and chickens in addition to the estimated 5,500 beef and dairy cattle in the Seashore; supports a new pastoral zone framework with hundreds of acres in newly designated “ranch core” areas converted to row crops, which may constitute “development” as defined by Section 20106 of the Coastal Act (e.g., grading, removing, or extraction of any materials; changes in the density or intensity of the use land, ...change in the intensity of use of water, or access thereto); opening B&B’s and retail stores; and lethally removal of some or all of the free-roaming elk that populate the environs of Drakes Beach—a measure meant to guarantee sufficient forage for the cattle, which outnumber elk at the Seashore 10 to 1.

These expanded commercial activities, which ranchers have long pressed for, are clearly intended to shore them up financially at a time when overproduction has pushed dairy prices to all-time lows and demand for beef and dairy products is in decline.

The PRNS preferred alternative described herein raises a number of concerns with respect to resource protection policies enumerated under the Coastal Act, including Section 30230 (maintenance of marine resources), Section 30231 (protection of biological productivity of coastal waters and water quality), Section 30244 (preservation of archaeological resources), Section 30233 (restrictions on filling of wetlands), Section 30230 (protection of marine resources), Section 30235 (limitations on shoreline altering development), Section 30240 (protection of ESHA), and Section 3353 (minimization of adverse impacts of development).

The NPS recently postponed the planned release of final GMPA/EIS until later this summer.

### **Relevant Legislative History**

Congress established Point Reyes National Seashore (PRNS) in 1962 *“to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped.”*

Nothing in the enabling legislation provides for ranching in perpetuity, including in the pastoral zone—18,000 acres that constitute one-third of the national seashore leased to commercial beef and dairy operators. The continuation of ranching at the Seashore is at the sole discretion of the Secretary of the Interior.

Ranches at the Seashore predate establishment of the park. During the 1960s and 70s, the federal government paid ranch owners the equivalent of \$380 million in today’s dollars to purchase the land for the national park. The owners retained a right of use and occupancy of not more than 25 years, or for a term ending at the death of the owner or his or her spouse, whichever came later. But when the end

dates arrived around the mid-1980s, ranchers did not want to leave, and the National Park Service continued commercial ranching and dairying activities under special use permits. The ranchers continue to assert their entitlements at the Seashore and GGNRA, two NPS units that are managed by staff at Point Reyes National Seashore. Through powerful political allies and legislative maneuvering, 24 ranches and more than 5,500 cattle remain in the park.

### **Local Agriculture**

By NPS estimates, ranching in PRNS and the GGNRA combined accounts for \$16 million of Marin County's \$96.5 million in agricultural revenues. The economic value attributed to tourism at Point Reyes Seashore in 2018 alone was more than \$107 million.

Ranchers in the park pay no property taxes and are afforded unique subsidies, including below-market rent, deeply discounted grazing fees compared to those paid by ranchers outside the park, and NPS maintenance for their residences, fences, and ranching infrastructure. Local agriculture isn't bolstered by these subsidized operations. These unique benefits to ranchers in the park—at taxpayer expense—put local ranchers outside the park at a competitive disadvantage.

The ranches were added to the National Register in 2018, preserving them as historic resources. None of the working ranches in the park are open to the public. The NPS provides no interpretation of these ranches, which are regarded as family farms.

Various historic aspects of ranching have been replaced by massive modern infrastructure (i.e., the ranch loafing barn development) necessitated by these commercial operations.

Ranches do not need to be in operation in order to be preserved as "historic" resources. Under Alternative F, the seven qualities of historic integrity (location, design, setting, materials, workmanship, feeling and associations) relating to the ranching operation can remain intact as they have in other significant historic ranching districts such as the Santa Rosa Island Ranching District, Channel Islands National Park, as well as the Hunter Hereford Ranch Historic District, Grand Teton National Park. In its GMPA/DEIS, the NPS at Point Reyes does not adequately explore how cessation of ranching and dairying could provide for adaptive reuse and public use, interpretation, and enjoyment of these historic resources by increasing overall public access to these coastal resources.

Case and point: Pierce Point Ranch, which opened in 1858, ceased operations in 1973. Three years later, Congress authorized the creation of the wilderness area and incorporated the Pierce Point Ranch as habitat for the reintroduction of native Tule elk, a species that had been extirpated when the land was taken over for ranching. Pierce Point remains the only interpreted and publicly accessible ranch within the legislative boundary of PRNS.

### **Public Access and Interpretation in the Seashore and GGNRA**

Point Reyes National Seashore is the only national seashore on the Pacific Coast. In addition to preserving an undeveloped swath of the California coast, the Seashore was envisioned to provide a national park experience to a growing urban population, including those who might not have the means to get to a Yosemite or Yellowstone. The Seashore is barely an hour from San Francisco and other parts of the Bay Area. It is accessible by public transportation and there's no entrance fee.

Surveys show that visitors come to the Seashore is to see wildlife and to be in nature. COVID-19 has focused attention on the growing need for outdoor recreation close to home, and the importance of parks and nature to health and well-being. Yet, contrary to the purposes of national parks, the public is excluded from one-third of the national seashore and encounters unofficial “No Trespassing” signs; locked gates; barbed wire fences; and trails, beaches, and waterways fouled by cow manure. Ranchers recently posted signs and closed the road to all visitors when the park was open to bicyclists and pedestrians. When informed, the acting superintendent claimed to be unaware that the ranchers had closed the road.

Cattle roam on trails and encroach on beaches, wetlands, and creeks, which are, at times, closed to the public due to high concentrations of fecal bacteria from cattle manure.

### **Water Quality**

Numerous local, state and federal agencies charged with protecting water quality and marine environments have been enacted since PRNS was created in the 1960s. It is difficult for a layperson to navigate the maze of agencies and regulations regarding California’s water laws and the processes by which determinations are made.

It is unclear whether water-quality testing at the Seashore is conducted regularly, or at all, or by whom.

Testing data for coastal watersheds—particularly the Drake’s Estero Marine Wilderness Area—remains scarce. Despite a lack of current data on water quality, and known water quality problems within the planning area, we anticipate the NPS at PRNS and the SFRWQCB will continue to sign off on new conditional waivers that allow nonpoint source polluters (i.e., dairies) to continue to exceed the total maximum daily load of pollutants into the coastal watersheds and the marine protected area.

What is known is that tons of cow manure spread on parklands ultimately washes into creeks that flow into Drakes Estero—a federal wilderness area vital to migrating birds and marine mammals; Abbotts Lagoon; Tomales Bay, and surrounding coastal and marine environments. Kehoe Creek is distinguished as one of the most polluted waterways in the state. High fecal bacteria have closed public beaches and aquaculture in the Tomales Bay watershed.

Compliance by ranchers at PRNS traditionally has been lax, as have oversight and enforcement. The current conditional Clean Water Act waivers, issued to ranchers by the SFRWQCB in 2015, expired in June 2020. New 5-year waivers are imminent, despite known long term and ongoing discharges into the coastal watershed.

A 2020 letter from the SFRWQCB (attached) suggests that no areas of the Seashore other than those in a 2019 study of Olema Creek, are regularly monitored for water quality. No water data was provided in the letter, which states:

*"We also received several comments that the Water Board is well aware that dairy manure is causing high fecal coliform levels in Point Reyes waters. We are not aware of the basis for this comment. While we cannot monitor every creek, the Water Board and our partners monitor water quality in some surface waters located near dairies and grazing operations. For example, we assessed Olema Creek bacteria levels to evaluate the effectiveness of the regional water quality improvement plan for the Tomales Bay watershed, which includes some Park lands."*

The 2019 study referred to above, [\*Management Scale Assessment of Practices to Mitigate Cattle Microbial Water Quality Impairments of Coastal Waters\*](#), was conducted by agricultural agencies to assess mitigation measures (BMP) that could improve water quality at the Seashore. It recommends strategies to protect public health from waterborne microbial pollutants in grazed coastal systems, including fencing to keep cattle out of creeks and providing alternative drinking water sources for cattle.

These BMPs are neither new nor radical. A 2000 report by the CCC, [\*Nonpoint Source Program Strategy and Implementation Plan, 1998-2013\*](#) (PROSIP) states: *"MM 1E is intended to protect sensitive areas (including stream banks, lakes, wetlands, estuaries, and riparian zones) by reducing direct loadings of animal wastes and sediment. This may include restricting or rotationally grazing livestock in sensitive areas by providing fencing, livestock stream crossings, and locating salt, shade, and alternative drinking sources away from sensitive areas."* (p.90.)

Whether any of these BMPs have implemented at the Seashore in the 20 years since the CCC issued these recommendations is not apparent. Neither is it clear whether the NPS's "sign off" on CWA waiver applications is based on current data (or any data), or if the SFRWQCB requires or uses data in determining to renew the waivers. It is unrealistic and financially prohibitive that concerned citizens conduct water-quality testing or monitor the ranches for compliance with state and federal laws.

If recent or current data does exist for the creeks, ponds, estuaries, bays, lagoons, and ocean beaches at Point Reyes Seashore, it is beyond the public's reach. California Water Law is applicable to all federal lands. Water quality in the national seashore must be addressed.

### **Water Availability**

In addition to ongoing concerns about water quality, the NPS at PRNS propose various developments in the planning area that raises concerns about changes in the intensity of water use and access thereto. The proposals delineated in the GMPA/DEIS preferred alternative (Alternative B) include maintenance of current stocking rates, diversification of livestock, and land-use change for row crops, but the GMPA/DEIS fails to analyze relevant climate futures (e.g., "Warm-Wet"; "Hot-Dry") scenarios to examine the natural resource impacts of sustained and increasingly altered land-use for commercial agriculture. At a minimum, the NPS at PRNS should have provided climate futures that include projected changes in annual and seasonal temperature and precipitation, as well as extremes of these variables.

Furthermore, as outlined in Runyon et al. 2020, because it can be difficult to infer resource impacts from temperature and precipitation changes alone, the NPS at PRNS should model water balance for the various alternatives provided in the GMPA/DEIS. Changes in water availability are almost always important to park resources.

The NPS at PRNS fails to integrate temperature and precipitation using a simple water balance model that can estimate changes in soil moisture, evapotranspiration, and ecological water deficit, where water deficit is the difference between the amount of water available to plants and the amount of water that plants could use if it were available (Lutz et al. 2010).

Without various credible, easily understood stories about future climates at PRNS, or projections for best- and worst-case futures, it is increasingly difficult for the public, government agencies, or other interested stakeholders to understand the changes in water balance under each of the proposed alternatives. As a

result, there is no way to surmise the implications for surface and/or groundwater flows, fire hazards, plant distribution and growth, forage availability, and other processes important for park management—especially under the preferred alternative in the GMPA/DEIS for PRNS (Bonan 2008).

## Wildlife

Agriculture—animal agriculture, in particular—is known to have an outsized influence on conservation, preservation, and restoration outcomes for biodiversity across landscapes. In addition to the state and federal laws protecting Endangered, Threatened and Rare species, Point Reyes was designated a State Marine Conservation Area in 2010. Under California Code of Regulations (CCR) Title 14, Section 632, *it is unlawful to injure, damage, take or possess any living, geological or cultural marine resource for recreational and/or commercial purposes.*

Yet, commercial ranching and dairying activities PRNS and the GGNRA are within and adjacent to riparian, coastal sage scrub, dune, grassland, and/or oak woodland and maritime chaparral ecosystems, and the Draft EIS for PRNS has indicated that under both the “No Action” alternative and the “Preferred Alternative (B)” cattle ranching and dairying have altered and adversely impacted the resources associated with these sensitive habitat-types, including: soil erosion, erosion of sensitive coastal bluffs, soil compaction, and alteration of soil fertility; impacts to the watershed; emissions of criteria pollutants and greenhouse gases including ammonia (NH<sub>3</sub>), volatile organic compounds (VOC), carbon dioxide-equivalent (CO<sub>2</sub>e) emissions, fugitive dust, and particulate matter (PM<sub>2.5</sub>). Some such impacts meet the definition of “damage” provided in Section 13190(b) of Title 14 of the California Code of Regulations (“14 CCR”). A host of federal and state-listed native species within and around the Coastal Zone are at risk from the water pollution, habitat destruction, and predators related to ranching at the national seashore.

Over [fifty plants](#) at the Seashore are currently listed by the federal government, state government, or the California Native Plant Society. And more than [fifty species of animals at Point Reyes are listed by the state or federal government as threatened, rare, or endangered](#), including many dependent on the coastal zone.

A few examples:

- Endangered Western Snowy Plovers nest in areas along Drake, Kehoe, and Limantour Beaches and the dunes at Abbotts Lagoon. Statewide, the nesting habitat for plovers was halved between 1970 and 2001 and the population has dwindled to a few thousand. Since then, the species has been subject of a multi-decade, multi-million-dollar recovery effort at the Seashore, frequently resulting in extensive beach closures during nesting session. The Plover chicks are predated by artificially large populations of common ravens that congregate at the ranches on the outer peninsula. In 2012, PRNS staff suggested immediate changes could be made by ranches to reduce Common Raven attraction, such as covering food troughs and calf housing; erecting exclusion fencing; and prompt removal of raven food sources (e.g., uneaten or scattered feed, placentas, and carcasses). In the 2019-20 Western snowy plover nesting season, common ravens have continued to cause impacts to this endangered species. As of May 15, 2020, 57 percent of nests had failed and 75 percent of failed nests were preyed upon by Common Ravens.
- According to water-quality data downloaded from [The Water Quality Portal](#), a cooperative service sponsored by the U.S. Geological Survey, Environmental Protection Agency and National

Water Quality Monitoring Council, Kehoe Creek consistently exceeds water quality criteria and standards and is [one of the most polluted waterways](#) in the state.

- Drakes Estero, the ecological heart of Point Reyes National Seashore and the only Marine Wilderness Area on the West Coast, is contaminated with cattle manure. Cattle are frequently seen on the wetlands and beaches of the estuary (see photos). Offsite discharges also flow into Drakes Estero. Eel grass, crucial to marine mammals and migrating birds, is under restoration at the Estero, but compromised by cattle impacts to the estuary and watershed.
- Abbotts Lagoon suffers from cattle manure effluent that dairy ranchers routinely spread on park pastures.
- Tomales Bay is listed as “impaired” under the Water Quality Control Policy for Developing California’s Clean Water Act, Section 303d

### Climate Impacts

California’s sand dunes are relatively limited due to its young, tectonically active coastline. Dunes provide a number of ecological and human benefits, including wildlife habitat, recreation, water purification, and beach access.

The NPS recognizes that PRNS is vulnerable to sea level rise. Its own website [includes projections](#) of significant inundation and loss of coastal habitats as a result of climate change.

The scientific modeling shows us that the consequences for our park’s coastal landscapes are serious, including flooding, beach erosion, and saltwater intrusion. A 2005 report by the U.S. Geological Survey entitled “[Coastal Vulnerability Assessment of Point Reyes National Seashore to Sea-Level Rise](#)” indicates that areas such as Limantour Beach and Drakes Beach, which are ecologically important as well as favored visitor attractions, will go through the most drastic alterations due to sea level rise. Such “coastal squeeze” will continue to create hurdles to dune restoration and limit habitat for the myriad species that rely on these ecosystems at PRNS.

The NPS’s draft GMPA/EIS reveals that cattle are the largest source of GHG emissions at the Seashore, surpassing the GHG of the cars that deliver 2.5 annual visitors to the Seashore. However, the EIS does not discuss mitigation for the GHG (methane) produced by thousands of cattle. Nor does it account for the additional GHG emitted by trucking in cattle feed from the Central Valley and Nevada when the grasses at the Seashore are depleted.

In 2008, PRNS joined the Climate Friendly Parks Network, a collaboration between the Environmental Protection Agency and the National Park Service. Its [2010 Climate Action Plan](#) claims to have achieved a 14 percent reduction in GHG through implementing solar panels and electric shuttles. Its Climate Action Plan also calls for exchanging incandescent light bulbs with LEDs and biking to work. The plan mentions methane digesters that, if installed, could convert cow manure to electricity. However, there is no mention in the EIS of installing them, nor of reducing the number of cattle that are the source of the GHG problem.

The answer, according to ranching advocates, is “carbon farming,” a method by which the cattle are constantly rotated among pastures to lessen the soil compaction, erosion, overgrazing, and manure



concentrations that result from current grazing practices at the Seashore. In theory, rotating the cattle promotes carbon sequestration. Unfortunately, native grasses, which have deep roots and have been shown to be even more effective than forests in sequestering carbon, have been almost entirely replaced by exotic plants with limited capacity to retain carbon or stabilize the soil.

Replacing cattle with native grazers and restoring native plants are not discussed in the EIS. Of the six alternatives the NPS analyzed, only Alternative F, which would phase out ranching, eliminates many of the environmental and climate impacts to the park and coastal zone.

### Johne's Disease

A potentially fatal bacterial disease [has been found](#) among free-roaming elk herd at Point Reyes National Seashore, raising concerns about the proximity of wildlife to cattle on national parkland.

Johne's Disease (pronounced Yo-nees) is a contagious and chronic intestinal disease that afflicts cattle—particularly dairy cows. Other ruminants, deer, sheep, goats, antelopes, elk—also are susceptible when they come into contact with water or forage where the fecal bacteria that carry the disease are present. (See Letter to the NPS on Johne's Disease attached.) Johne's is a "zoonotic disease," meaning it can spread between species and "spill over" from animals to humans. Zoonotic diseases [cause billions of cases](#) of human illness each year.

The NPS is aware that Johne's disease has infected elk and deer at the Seashore, but has not tested cattle at the Seashore in 40 years.

*"A 1979 study documented the presence of Johne's disease in 5 of 10 dairy herds tested at Point Reyes National Seashore (PRNS) (Riemann et al.). The disease has been documented in Tule elk at Tomales Point Elk Reserve during the course of several studies since 1980 (Jessup et al. 1981, Manning et al. 2003, Cobb 2010). Johne's disease has been detected in (now-extirpated) axis and fallow deer at Point Reyes (Riemann et al. 1979), and several studies have documented Johne's in North American deer species, suggesting that black-tail deer at Point Reyes are potential carriers of the disease."*

More is now known about Johne's Disease. Recent studies of the bacteria responsible for Johne's Disease, *M. a. paratuberculosis* (MAP), found the bacteria in humans with Crohn's Disease. (A direct causal link is not yet confirmed.) MAP also is associated with a number of other human illnesses including irritable bowel syndrome, rheumatoid arthritis, Type 1 diabetes, and colorectal cancer.

According the U.S. National Advisory Committee on Microbiological Criteria for Foods, *the bacteria associated with the disease, called MAP, survives in cattle feces, water and soil... and can come into contact with food crops that result in human exposure."*

The draft EIS for the Seashore omits the impacts of Johne's to wildlife, as well as potential human health risks of the disease. Neither is the likely role of cattle manure in spreading the disease discussed. Cattle manure is routinely spread over park pastures as slurry, (see photo), which runs off into the park's waterways and Coastal Zone.

Alternative B—the NPS's "preferred alternative" expands livestock agriculture to include goats and sheep—animals highly susceptible to Johne's Disease that are known to transmit the disease. More than 2.5 million people visit Point Reyes Seashore annually. The confined cattle operations and manure

concentrations are at dairy ranches in the coastal areas that are popular with visitors, who are likely to come into contact with water sources and land subjected to manure spreading. At very least, the NPS needs to consider mitigation and inform the public of the risks of exposure.

## Conclusion

Per Section 30007.5 of the California Coastal Act, the Legislature finds and recognizes that conflicts may occur between one or more policies of the division. It is clear the numerous alternatives proposed in the PRNS GMPA/DEIS present policies and recommendations that conflict with various CCC policies (e.g., natural resource protection and desires to preserve coastal agriculture and public access). The Legislature also declares that in carrying out the provisions of the CCC, “such conflicts be resolved in a manner which on balance is the *most protective of significant coastal resources*” (emphasis added).

Given the myriad concerns and conflicts expressed above, we implore you to take great care in resolving conflicting policies within the planning area in a manner that is most protective of these coastal resources.

Thank you for your consideration of these impacts when considering the consistency of the NPS’s forthcoming GMPA with California laws.

We welcome continued engagement with you.

Sincerely,

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**From:** james.coda@comcast.net <james.coda@comcast.net>  
**Sent:** Tuesday, June 16, 2020 6:55 PM  
**To:** Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>  
**Subject:** Water Pollution at Point Reyes Nat. Seashore and Golden Gate Nat. Rec. Area

Hi Larry,

Thank you for explaining how the California Coastal Act works with respect to federal agencies.

I said I would forward to you a letter I wrote recently to the San Francisco Regional Water Quality Control Board about the water pollution at Point Reyes National Seashore and the Golden Gate National Recreation Area. Attached is my letter.

I'm also attaching the Board's letter that I was responding to and one of seven pieces of correspondence that triggered the Regional Board's letter.

Sincerely,

Jim Coda  
415 602-6967  
<https://jimcoda.com>

## **Please stop NPS from killing tule elk**

Executive Director John Ainsworth,

I am writing to express my disapproval of plans to kill the native, free-roaming tule elk of Point Reyes National Seashore as outlined in Plan B of the environmental impact statement for the General Management Plan Amendment.

Up until a few decades ago, tule elk were thought to be extinct as a result of unfettered commercial hunting and displacement by cattle. Many California residents and groups—including the National Park Service and U.S. Fish & Wildlife Service—spent decades working to re-establish a free-ranging herd on the National Seashore.

Tule elk symbolize the conservation of native species and ecosystem processes, one of the primary missions of the National Park Service. The National Park Service should support actions to improve the ecological health and integrity of the landscape—which includes free-roaming tule elk herds—without killing elk.

Can you help stop this strategy by urging further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before the National Park Service signs this disastrous plan?

Thank you for your time.

We strongly urge the Commissioners to reject the NPS submittal because it misrepresents consistency of the GMP with the California Coastal Act with respect to Section 30251 Scenic and visual qualities.

Thank you for your consideration.

Susan & Dennis Fischer  
2735 Cherry Lane  
Walnut Creek, CA 94597